

SUMMARY STATEMENT

1. My name is Suzanne Richmond. I am a Heritage Advisor specialising in planning in the Heritage team at Christchurch City Council.
2. I have prepared planning evidence on Plan Change 14 on behalf of the **Christchurch City Council** in relation to the Heritage Items topic. I address Central City matters in Issue 7 of my primary evidence (paragraphs 8.1.141 – 8.1.201), and at paragraphs 60-73 of my rebuttal evidence, in relation to City Centre Zone rules for heritage sites and central city height overlays and interfaces which support the protection of heritage values.
3. In relation to the Arts Centre and New Regent Street height overlay qualifying matter for these two Highly Significant heritage items, I am not recommending any changes to the notified proposal which seeks to retain the operative height limits of 16 metres on the site containing the Arts Centre heritage item and setting, and 8 metres on the sites containing the New Regent Street heritage item and settings.
4. Reduced height limits, which were recognised in the Christchurch Central Recovery Plan as necessary to protect the sensitivity of certain areas,¹ support the operative activity rule for new buildings in heritage settings by managing expectations as to a lesser scale of development which is appropriate on these sites in order to protect the heritage values of these key heritage precincts from visually dominant buildings of much greater enabled height being constructed on these sites, which could also shade the heritage settings and impact on their use.
5. I continue to support the notified qualifying matter heritage height interface of 28 metres which seeks to retain the operative height limit on the closest adjoining sites to the Arts Centre and New Regent Street with the greatest potential for adverse effects associated with the scale of tall buildings enabled up to 90 metres on those interface sites which have a direct visual connection with the heritage items and settings. The intention of the targeted rule is to reduce the City Centre Zone enabled height only to the extent necessary to accommodate the qualifying matter². There is no operative activity rule for new buildings adjoining heritage settings, so this rule provides a signal that 28 metres is a more appropriate height to protect the Arts

¹ Christchurch Central Recovery Plan Te Mahere “Maraka Ōtautahi” (CCRP) - Lower buildings, page 40: “...A lower-rise city...also recognises the character and sensitivity of certain areas, such as New Regent Street, and reduces wind tunnels and building shade”. CCRP – Height of buildings, page 105: “...Some exceptions to these height limits exist for particularly sensitive sites including...New Regent Street where lower heights are required to ensure sunlight provision and/or reflect existing character.” Also quoted in the planning evidence of Andrew Willis, paragraph 52-53.

² NPSUD Policy 4, and RMA Section 771 and section 770.

Centre and New Regent Street heritage precincts from visual dominance effects, and also from shading effects in relation to New Regent Street. The qualifying matter height interface rule aligns with the amended proposal for an urban design consent for buildings over 28 metres, which Alistair Ray describes as a “natural threshold” in his urban design evidence³, but allows a specific heritage values focus with targeted matters of discretion. Amanda Ohs discusses the heritage values of the Arts Centre and New Regent Street, which the rule is seeking to protect, in her primary and rebuttal technical evidence.

6. The height overlay and interface rules for the Arts Centre and New Regent Street support the implementation of the NPSUD and the Proposed Strategic Directions and CCZ policy framework of the District Plan by meeting the cultural wellbeing needs of a well-functioning urban environment⁴, responding to local character and context⁵, reinforcing the City’s distinctive sense of place⁶, and recognising the importance of encouraging pedestrian activity and amenity of significant public open space by maintaining sunlight access and managing visual dominance effects on these spaces⁷. This is relevant for the New Regent Street outdoor dining area. There are specific policies for the Arts Centre and New Regent Street heritage items and settings in Policy 15.2.4.1 Scale and form of development⁸.
7. In response to submissions seeking changes to the operative District Plan that were not proposed in PC14, at paragraph 73 of my rebuttal evidence, I agreed to the extent of the heritage setting of the New Regent Street heritage item being amended to exclude the footpath on the north side of Armagh Street adjoining the New Regent Street height interface sites at 129-143 Armagh Street. I note this here, as a change to the heritage setting was sought under the same submission point as deletion of the heritage height interface⁹, and this will be a relevant consideration in the Heritage items hearing topic.
8. In addition, in response to a submission from the owners of the site containing the heritage item at 25 Peterborough Street¹⁰, at paragraph

³ Paragraph 84 of Alistair Ray’s evidence.

⁴ NPS-UD Objective 1 and Policy 1; Proposed Objective 3.3.1 Enabling recovery and facilitating the future enhancement of the district b. “A well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future...”

⁵ Proposed Objective 15.2.4 a.ii Urban form, scale and design outcomes; Proposed Policy 15.2.4.2 a.ii. Design of new development: <https://chch2023.ihp.govt.nz/assets/Council-Provision-Update-18-August/PC14-for-s42A-Chapter-15-Commercial.DOCX>

⁶ Proposed Objective 3.3.7a.iii.D. Urban growth, form and design; Proposed Policy 15.2.4.1. a. Scale and form of development.

⁷ Proposed Policy 15.2.4.2 a.i. and x.iii. Design of new development; Proposed Policy 15.2.6.3 a.ii. Amenity.

⁸ Proposed Policy 15.2.4.1 a. iv. and v. Scale and form of development.

⁹ S823.234 The Catholic Diocese of Christchurch and FS2045.407 Carter Group Limited.

¹⁰ S150.6 Ceres New Zealand.

8.1.183 of my primary evidence, I accept the deletion of two site specific rules¹¹ which restrict the activities that can be undertaken within the heritage item and setting for the reasons set out at that paragraph.

9. I remain of the view that the heritage provisions proposed in PC14:
- (a) support the protection of heritage within the central city as a matter of national importance under s6f of the RMA;
 - (b) support the relevant Canterbury Regional Policy Statement and District Plan objectives and policies, and
 - (c) modify the Full Intensification scenario under the IPI¹² only to the extent necessary to accommodate the heritage items qualifying matter, in order to achieve better sustainable management than Full Intensification.

Date: 24 October 2023

Suzanne Richmond

¹¹ Operative rules 15.11.1.1 P17 and 15.11.1.1.c. which limits permitted activities at 25 Peterborough Street to P13 (Residential activity), P14 (Visitor Accommodation) and the list of activities contained in P17.

¹² RMA s80E.