

SUMMARY STATEMENT

1. My name is **Alistair Ray**. I am a Principal and Senior Urban Designer at Jasmox. I have over 30 years' experience as an urban planner and urban designer, the last 17 of which have been in New Zealand.
2. I have prepared evidence on behalf of the **Christchurch City Council** to [continue as appropriate].
3. I have prepared this statement of evidence on behalf of the Christchurch City Council (the **Council**) in respect of urban design matters arising from the submissions and further submissions on Plan Change 14 to the Christchurch District Plan (the **District Plan; PC14**).
4. My evidence is focused on urban design in the City Centre Zone (**CCZ**) only, with particular focus on building heights and the control of taller building elements, including the qualifying matters (**QMs**) applying to building heights in Victoria Street and identified heritage areas (The Arts Centre, New Regent Street and Cathedral Square).
5. I recognise the mandate laid out by the National Policy Statement – Urban Development (**NPS-UD**) for Tier 1 regional and territorial councils to enable increased development capacity in commercial zones which has led to Christchurch City Council's response via PC14. For the CCZ, the response of PC14 has largely been to increase building heights. Policy 1 also seeks the delivery of well-functioning environments, and it is
6. My evidence specifically addresses the following two key issues:
 - (a) Whether or not increased building heights is an appropriate response in a Ōtautahi Christchurch context from an urban design perspective; and
 - (b) Whether the proposed planning provisions within PC14 are appropriate to ensure high quality urban design outcomes in the CCZ.
7. With respect to the first issue, my evidence addresses the issue of the definition and how to deliver "well-functioning environments".
8. Whilst the NPS-UD mandates enablement of development, it also seeks the delivery of well-functioning environments. It is implicit that enablement should not be at the expense of a well-functioning environment.

9. Indeed, additional guidance by the Ministry for the Environment states that:

None of the intensification requirements are intended to override or undermine good quality urban design or quality urban environments.

10. Christchurch has some unique characteristics that set it apart from other Tier 1 cities. The location of the city in a relatively unconstrained plain has resulted in a historically lower rise city than the more constrained cities of Auckland and Wellington, and with the latitude the mid-rise building form helps to maintain sunlight in the streets. Post-earthquakes, the people of Christchurch bought in to a strategy of a mid-rise form and over the last few years I consider that the city centre has been developing into one of New Zealand's best urban environments.
11. As a result, care needs to be taken to ensure that enabling development doesn't come at the expense of nurturing and enhancing this well-functioning environment.
12. Consequently, in my opinion I conclude that increased heights are not an appropriate response in a Ōtautahi Christchurch context, unless there are appropriate plan provisions for ensuring high quality urban design outcomes for taller buildings within the CCZ.
13. The second part of my evidence looks at the appropriateness of these measures and discusses each of the proposed standards in detail.
14. The position is generally one of enablement. Whereas currently 28m has probably been regarded as an upper height limit (even though it has not technically been a de-facto height limit), PC14 takes a different position and recognises that buildings can go above 28m.
15. My evidence discusses the relatively consistent upper building height of 28m that has emerged in Christchurch City Centre – partly due to the planning provisions of the City Centre Recovery Plan (**CCRP**) and subsequent operative District Plan, but also historically Christchurch has typically been a relatively mid-rise built form in the city centre, with relatively few buildings over 28m and even fewer buildings above 45m.
16. That is why a number of additional rules / design standards and matters of discretion have been introduced to guide the design of buildings above 28m – that will project beyond the relatively consistent 28m height – to ensure continued good quality design outcomes.

17. Given that these new rules / standards are Restricted Discretionary (**RD**) in activity status, they need to be considered more as a baseline to guide developers and consenting planners, but recognising that a RD consent will be required whether the standards are met or not, to demonstrate good quality outcomes with respect to more qualitative matters.
18. Indeed, all buildings in the CCZ above 14m already require Restricted Discretionary consent under the operative plan.
19. The notion of no development standards has been raised in submission and expert conferencing. Instead, simply relying on matters of discretion. I do not consider this to be the best way forward. In my experience, landowners and developers appreciate some guide to what is considered appropriate – almost as a baseline. This also helps in the Council consenting process, as planners also have a baseline to work from.
20. That is not to say that development standards need to be applied in a pass/fail sense. They should be treated as a baseline but recognising that there may be many valid circumstances why these standards cannot be met but that the proposed development still provides a good quality design outcome in accordance with the higher-level policy expectations for the city's built form.
21. In my evidence I proposed some changes to the general urban design matters of discretion that applied to buildings above 28m. I note that Ms Holly Gardiner has proposed and tabled some further changes to these matters of discretion – generally grammatical improvements to provide more clarity. I support these additional changes.
22. Consequently, I conclude that the standards and matters of discretion as proposed in PC14 are both necessary and appropriate to provide the appropriate levels of design control for buildings in the city that are taller than has been typical for the city centre.

Date: 21st October 2023

Alistair Ray