

**BEFORE INDEPENDENT HEARING COMMISSIONERS
IN CHRISTCHURCH**

TE MAHERE Ā-ROHE I TŪTOHUA MŌ TE TĀONE O ŌTAUTAHI

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the hearing of submissions on Plan Change 14 (Housing and Business Choice) to the Christchurch District Plan

**STATEMENT OF PRIMARY EVIDENCE OF JANE MAREE RENNIE ON BEHALF
OF CHRISTCHURCH CITY COUNCIL**

RESIDENTIAL CHARACTER AREAS

Dated: 11 August 2023

TABLE OF CONTENTS

EXECUTIVE SUMMARY	1
INTRODUCTION	5
QUALIFICATIONS AND EXPERIENCE	6
CODE OF CONDUCT	6
SCOPE OF EVIDENCE	7
BACKGROUND TO CHARACTER AREAS	8
SUBMISSIONS RELATING TO MAPPING OF CHARACTER AREAS	15
SUBMISSIONS RELATING TO DISTRICT PLAN PROVISIONS	24
CONCLUSIONS	48
APPENDIX A – EVALUATION REPORT – ASSESSMENT OF ADDITIONAL CHARACTER AREAS ARISING FROM SUBMISSIONS ON PC14	
APPENDIX B – SUMMARY TABLE OF SUBMISSIONS ADDRESSED IN EVIDENCE	

EXECUTIVE SUMMARY

1. My name is **Jane Maree Rennie**. I am employed as an Urban Designer at Boffa Miskell.
2. I have prepared this statement of evidence on behalf of the Christchurch City Council (the **Council**) in respect of matters arising from the submissions on Plan Change 14 to the Christchurch District Plan (the **District Plan; PC14**).
3. This evidence relates to the Residential Character Areas (**Character Areas**) Qualifying Matter. Specifically, it relates to the identification of existing Character Areas as a Qualifying Matter, the proposed alteration of existing Character Area boundaries, identification of new Character Areas, and the District Plan provisions applying to these areas which are intended to maintain and enhance the special character values. In addition, this evidence considers the impact of changes to the different activity statuses outlined in PC14 and the associated built form standards that would apply.
4. More generally, this evidence provides background to the Character Areas, including how they have been assessed as part of consideration as a Qualifying Matter.
5. Various submitters have requested the addition or removal of properties from proposed Character Areas identified in PC14, and a review of each of these submissions has been undertaken. These have been considered against the same methodology employed for the original Boffa Miskell technical assessments. I do not recommend any changes to the boundaries of the Character Areas as included in PC14. That said, I do recommend changes to one Character Area, Dudley, for reasons I explain below.
6. My evidence also addresses submissions requesting the introduction of new Character Areas as a Qualifying Matter. A technical assessment applying the same methodology for the notified Character Areas has been undertaken and is set out in full in **Appendix A** and summarised in my evidence. I consider that Cashmere View Street should be identified as a Character Area (as sought by various submissions, including Submission 581) given it meets the threshold criteria for identification of a Character Area.

7. Finally, in response to key questions raised in submissions and identified by Ms White, this evidence considers the appropriateness of the activity statuses and built form standards in maintaining and enhancing the special character values of the Character Areas¹, and if there are alternative options that would retain the values and provide a more enabling framework.
8. Based on my assessment of the issues raised, I conclude the following:

Alignment of underlying zoning of District Plan with Character Area values

- (a) The existing zones within the District Plan provide for a scale and form of development that is broadly consistent with the majority of the Character Area values, albeit the appearance of buildings may be different. Development enabled under the Medium Density Residential Standards (**MDRS**) will be visibly different in scale and form (and also, potentially, appearance) and will result in an obvious change in the environment.

Impacts of MDRS on Character Area values

- (b) The application of the MDRS standards across the Character Areas would undermine the special character values that contribute to the overall cohesiveness and consistency of the areas. In my view the increase in the density of development along with the redevelopment of 'Primary' and 'Contributory' dwellings will erode the particular values identified in the Character Areas.

Controlled activity status with area-specific built form standards

- (c) The introduction of 'specific' area-based built form standards aligning with the key attributes of each Character Area would assist to overcome a number of the issues associated with the current controlled activity approach and would reduce the risks of eroding character values. However, there still remains the risk of poor design outcomes, challenges with trying to resolve design issues and the inability to decline the application and

¹ Restricted Discretionary Activity status for most building works, along with a Controlled Activity status for rear units which meet modified built form standards.

as such it would not protect the special character values of Character Areas as a restricted discretionary activity (**RDA**) framework would.

- (d) The built form standards relevant to controlled activities do not strictly apply to an RDA. This is potentially a drafting error in the District Plan, given many of the standards are not relevant to what is covered under a Controlled Activity, i.e., residential units to the rear of the principal dwelling. My preference would be for PC14 to be modified so the built form standards apply. I have identified those 'priority' standards which I consider, as a minimum, should be applied to assist in managing the form/scale and location of an addition or new building.
- (e) There is a greater ability to secure a good design outcome for development visible from the street with an RDA status. It enables poor design outcomes that do not align with the policy intent to be declined or publicly notified in relation to effects on the values of character area/environment. As a result, I consider that the existing activity status should be retained with refinements to the built form standards applicable to RDA, as noted above.

Impacts of High Density Residential Zones on Character Areas

- (f) The potential scale of buildings anticipated within the high density residential zones (**HRZ**) will result in a greater contrast with the key attributes within Character Areas. The visual prominence of high density development (i.e. apartment typologies) could impact (negatively) on the community's appreciation of an area's values and this may be exacerbated depending on the built form and appearance of the buildings as a backdrop to the Character Areas. The Englefield Character Area is considered to be more vulnerable given the small scale workers cottages on small lots.
- (g) In respect to the Dudley Character Area, Mr Kleynbos is recommending an extension to the walkable catchment associated with the HRZ adjoining the Shirley Commercial Centre and Ms White is generally recommending these areas are not included in Character Areas. I have re-assessed the

remainder of the Dudley Character Area to see if it would continue to meet the threshold test and can support the change to the boundary recommended by Ms White, given the threshold would continue to be met with the exclusion of this area.

Built form standards

- (h) I consider that the built form standards set out in PC14 are justified in managing change in alignment with key character values.
- (i) I consider that these standards should also be applied to the RDA status. It is possible to reduce the number of specific area standards, with a number of priority standards outlined. Overall, however, my preference is that the suite of standards is maintained in full.
- (j) In response to Submitter 769 (Megan Power) I recommend the threshold under Rule 14.5.3.1.3 RD14 (a) relating to the size of a building that can be demolished is increased to 36m².
- (k) In response to Submitter 127 (Michael Fisher), I recommend that the height limit for the Englefield, Ranfurly, Francis, Malvern, Massey, Severn, Tainui, Ryan, Dudley, Beckenham, Piko and Eversham/Bewdley Character Areas is increased from 5.5m to 6.5m.
- (l) In response to Submitter 519 (James Carr), I recommend that an increase to the height limit to 8 metres (plus 2 metres for the roof pitch) for the Heaton and Cashmere Character Areas.
- (m) In response to Submitter 127 (Michael Fisher) and 733 (Beckenham Neighbourhood Association Inc), I recommend that the front yard setback within the Beckenham Character Area is reduced from 8m to 7m.
- (n) In response to Submitter 127 (Michael Fisher), I recommend that the side yard setbacks are amended to be 1m and 3m within the Beckenham Character Area.

- (o) I recommend that the building coverage in all Character Areas (except Englefield and Bewdley) is increased to 40% to reflect that previously recommended in the PC14 technical assessments.

INTRODUCTION

- 9. I have been engaged by the Council as an Urban Designer in relation to Character Areas as a Qualifying Matter as part of PC14. I have prepared a number of Character Areas Assessment reports² as relevant background to PC14.
- 10. In preparing this evidence I have reviewed the following documents:
 - (a) National Policy Statement on Urban Development 2020 (**NPS-UD**);
 - (b) The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (**Enabling Housing Act**);
 - (c) The **MDRS** set out in Schedule 3A to the Resource Management Act 1991 (**RMA**);
 - (d) PC14³, including the s32 report⁴, and relevant appendices, including Appendix 36 'Planning Assessment of District Plan Character Areas' and Appendix 37 'Technical Analysis of Proposed Character Area Provisions'.
 - (e) Relevant submissions received on proposed PC14⁵; and
 - (f) The operative District Plan.
- 11. I am authorised to provide this evidence on behalf of the Council.

² Boffa Miskell, 'Investigating of Qualifying Matters Otautahi Christchurch Suburban Character Areas', 17 October 2022 (updated from 1 June 2022 version) / Investigating of Qualifying Matters Otautahi Christchurch Suburban Character Areas – Stage 2A Addendum Report', 17 October 2022 / Investigating of Qualifying Matters Lyttelton Character Area', 26 July 2022.

³ Notified on 17 March 2023 <https://www.ccc.govt.nz/the-council/plans-strategies-policies-and-bylaws/plans/christchurch-district-plan/changes-to-the-district-plan/proposed-changes-to-the-district-plan/pc14/>.

⁴ Specifically pages 237-353.

⁵ Summary of submissions addressed in this evidence is set out in a summary table in Appendix B.

12. Appended to this evidence are the following:
- (a) **Appendix A** – Evaluation of additional Character Areas arising from submissions on PC14, prepared by Boffa Miskell; and
 - (b) **Appendix B** – Summary table of submissions addressed in this evidence.

QUALIFICATIONS AND EXPERIENCE

13. I am an Associate Partner and Urban Designer with Boffa Miskell Limited, based in the firm's Christchurch office. I have been employed by Boffa Miskell since 2009.
14. I hold the qualifications of Bachelor of Planning from Auckland University (1994) and a Post Graduate Diploma (Merit) in Urban Design from the University of Westminster (London) (2005).
15. I am a Full Member of the New Zealand Planning Institute. I am a member of the Urban Design Forum, a Crime Prevention Through Environmental Design (**CPTED**) Practitioner⁶ and a member of the Lyttelton Design Review Panel. The role of the Panel is to provide design advice to promote good design and a quality urban environment that expresses the local character and identity of Lyttelton.

CODE OF CONDUCT

16. While this is a Council hearing, I have read the Code of Conduct for Expert Witnesses (contained in the 2023 Practice Note) and agree to comply with it. Except where I state I rely on the evidence of another person, I confirm that the issues addressed in this statement of evidence are within my area of expertise, and I have not omitted to consider material facts known to me that might alter or detract from my expressed opinions.
17. At the time Boffa Miskell undertook the Character Areas as a Qualifying Matter assessments, I notified the Council that I am a trustee of a Family Trust that owns a property in an existing Character Area, and other Boffa Miskell employees own property

⁶ International Security Management and Crime Prevention Institute Advanced Workshop Training, 2017 / Advanced CPTED Training Course, Frank Stoks, 2010.

within existing Character Areas. A number of Boffa Miskell staff have been involved in the Character Area assessment reports, and not me alone. In addition, the Council have had a review role of both the methodology and the final reports prepared. The Council agreed, that on this basis, the potential conflict has been appropriately managed between Boffa Miskell and the Council.

SCOPE OF EVIDENCE

18. I have prepared this evidence in anticipation of expert conferencing on urban design matters associated with the Character Area Qualifying Matter.
19. My statement of evidence addresses the following matters:
 - (a) Background to the Character Areas included in the District Plan..
 - (b) Background to the NPS-UD, MDRS and PC14, as relevant to Character Areas.
 - (c) The methodology applied to the identification of Character Areas as a Qualifying Matter.
 - (d) The Character Areas recommended as a Qualifying Matter.
 - (e) Development parameters identified to maintain and enhance the special Character Area values and allow a level of intensification, along with proposed District Plan provisions.
 - (f) Comments, from an urban design perspective, on various issues raised in submissions relating to the Character Area Qualifying Matter, including:
 - (i) Requests for properties to be excluded or added to the notified Character Areas.
 - (ii) Requests for new Character Areas.
 - (iii) The appropriateness of the provisions in retaining the special values associated with the Character Areas and if an alternative framework could achieve the same outcome while allowing intensification.

20. I draw heavily upon the 'PC14 s32 Appendix 37 ' *Technical Analysis of Proposed Character Area Provisions*' report prepared by the Council⁷ as a continuation of the Character Area assessment reporting undertaken by Boffa Miskell⁸ and have sought to make it clear where I concur or otherwise with the recommendations set out in Appendix 37.

BACKGROUND TO CHARACTER AREAS

Character Areas in the Christchurch District Plan

21. Fifteen suburban Character Areas were identified and made operative as a Character Area Overlay through the Christchurch District Plan review in 2016. In addition, Character Areas were outlined for the townships of Akaroa and Lyttelton. These are areas in residential neighbourhoods that are distinctive from their wider surroundings and are considered to have a character, in the whole, worthy of retention.
22. Prior to the current District Plan in the mid-1990s, a number of Special Amenity Areas (**SAMs**) were established. The distinctive character of these areas has eroded over time and the Canterbury Earthquakes of 2010 and 2011 further exacerbated this, with whole areas Red Zoned or significantly damaged and rebuilt. Those that had remained intact formed the basis for suburban Character Areas considered for inclusion in the 2016 District Plan.
23. There is currently a policy framework and provisions in the operative District Plan (Character Area Overlay) that apply to Character Areas in order to maintain and enhance their identified special character values. The provisions are structured as follows:

- 14.2.4.7 *Policy Residential Character Areas in Christchurch City, Akaroa and Lyttelton*
- 14.4.3.1.2 *Area-specific controlled activities*
- 14.4.3.1.3 *Area-specific restricted discretionary activities*
- 14.4.3.1.5 *Area-specific non-complying activities*
- 14.4.3.2 *Area-specific built form standards relating to:*
 - 14.4.3.2.1 *Site density*

⁷ CCC PC14 s32 Report, Appendix 3.

⁸ Boffa Miskell, 'Investigating of Qualifying Matters Otautahi Christchurch Suburban Character Areas', 17 October 2022 (updated from 1 June 2022 version) / Investigating of Qualifying Matters Otautahi Christchurch Suburban Character Areas – Stage 2A Addendum Report', 17 October 2022 / Investigating of Qualifying Matters Lyttelton Character Area', 26 July 2022.

14.4.3.2.17 Landscaped Areas

14.15.23 Matters of control and discretion relating to:

- a. Area context
- b. Site character and street interface
- c. Built character
- d. Akaroa and Lyttelton

24. Design Guides exist for each of the Character Areas⁹ and specifically identify the special qualities of the areas and set out design principles to guide changes to properties including development.
25. Generally speaking, Character Areas are residential neighbourhoods that are distinctive from their wider surroundings and have a number of special attributes that are considered to be worthy of retaining. The original Beca character area assessment prepared for the Council in relation to identification of Character Areas for the operative District Plan¹⁰ included the following definition: *“Character Areas are generally located in more established areas of the city – containing all or a combination of landscape and built qualities including: dwellings of a certain style or era; dwellings with strong relationships to the surrounding environment; dwellings with high quality landscape features; and landscapes, streetscapes and topography of a unique character or high amenity.”*¹¹

NPS-UD, MDRS and PC14

26. The NPS-UD and the Enabling Housing Act allows for ‘qualifying matters’ to be identified and act as a constraint to housing and other intensification. In line with the NPS-UD, the Council has investigated Character Areas as potential Qualifying Matters, and included a number of them in PC14.
27. As part of the process Boffa Miskell assisted the Council by:
 - (a) Preparing a number of technical assessments to review the integrity and coherence of key attributes within the existing

⁹ <https://ccc.govt.nz/consents-and-licences/resource-consents/resource-consent-activities/residential-and-housing/character-areas>.

¹⁰ Beca, Christchurch Suburban Character Areas Assessment, 9 January 2025.

¹¹ Beca, Christchurch Suburban Character Areas Assessment, 9 January 2025, page ii.

Character Areas as a Qualifying Matter (along with additional suggested areas);

- (b) Considering potential impacts from intensification; and
 - (c) As a result, recommending a series of 'development parameters' that would seek to maintain and enhance the character attributes.
28. The potential for future development of properties located in Character Areas to proceed, while retaining the character values was considered further by the Council, in the context of the MDRS provisions. As a result, a recommended set of built form standards for Character Areas was outlined¹².
29. In summary, PC14 included 13 of the 15 Character Areas included in the District Plan, two of which area expanded (namely the Beckenham and Lyttelton Character Areas)¹³. In addition, as a result of pre-notification engagement on PC14, three new Character Areas have been introduced, namely Roker; Ryan; and Bewdley. PC14 also removes two existing Character Areas, The Esplanade and Clifton – and reduces the extent of some other areas¹⁴. With these changes, I consider that the Character Areas included in PC14 have a level of integrity and distinctive character worthy of retention.
30. The Character Area provisions that are proposed in PC14 (set out in summary later in my evidence) need to be considered in the context of the MDRS, which will define a future urban character for a neighbourhood through a set of mandated rules. These in effect provide a new baseline for development.

Methodology to assess Character Areas as a Qualifying Matter

31. The methodology to assess Character Areas as Qualifying Matters is set out in detail in the Council's s32 analysis and the Boffa Miskell

¹² CCC PC14 s32 Report, Appendix 37, dated January 2023.

¹³ In light of the inclusion of Lyttelton within the Otautahi Christchurch urban area the Lyttelton Character Area and associated District Plan provisions as they relate to the Lyttelton Character Area Overlay was reviewed and included. It is noted that a Residential Heritage Area is proposed for Lyttelton through Plan Change 13 which covers a broader area of the Lyttelton settlement than the area within the Character Area Overlay.

¹⁴ Boffa Miskell, 'Investigating of Qualifying Matters Otautahi Christchurch Suburban Character Areas', 17 October 2022 (updated from 1 June 2022 version) / Investigating of Qualifying Matters Otautahi Christchurch Suburban Character Areas – Stage 2A Addendum Report', 17 October 2022 / Investigating of Qualifying Matters Lyttelton Character Area', 26 July 2022.

reports¹⁵. The methodology largely utilised Beca's 2015 Character Area Study,¹⁶ which was considered still to be appropriate in the current context.

32. In summary, the methodology comprised a two-phase approach: firstly a preliminary assessment (largely desktop-based) to establish whether or not the potential Character Area had sufficient common attributes; and secondly, undertaking a site-by-site assessment.
33. For each study area, the following classification system was applied to sites within the area:
 - (a) **Primary** – Sites with buildings, structures, landscape, garden and other features that **define** the character of an area.
 - (b) **Contributory** – Sites with buildings, structures, landscape, garden and other features that **support** the character of an area.
 - (c) **Neutral** – Sites with buildings, structures, landscape, garden and other features that **neither defines, supports or detracts** from the character of an area.
 - (d) **Intrusive** – Sites with buildings, structures, landscape, garden and other features that **conflict/ detract** from the character of an area.
34. In order for an area to be recommended as a Character Area, 50% of sites within a Character Area must be classified as Primary and generally a further 30% Contributory (totalling 80% primary and contributory). However, in some cases when the Primary sites exceeded 50% by some margin, but the Area did not meet 80% overall (but still exceeded 70%), a judgement was made to retain the Character Area, based on consideration of the greater 'value' of the Primary sites and the key elements they retain in terms of defining the Area's character.
35. This was the case in relation to Englefield (62% Primary, 17% Contributory), Francis (70% Primary, 9% Contributory), Dudley (64%

¹⁵ Boffa Miskell, 'Investigating of Qualifying Matters Otautahi Christchurch Suburban Character Areas', 17 October 2022 (updated from 1 June 2022 version) / Investigating of Qualifying Matters Otautahi Christchurch Suburban Character Areas – Stage 2A Addendum Report', 17 October 2022 / Investigating of Qualifying Matters Lyttelton Character Area', 26 July 2022.

¹⁶ Beca, Christchurch Suburban Character Areas Assessment, 9 January 2025.

Primary, 8% Contributory), Beckenham (61% Primary, 11% Contributory) and Cashmere (59% Primary, 13% Contributory). These Areas did not meet the 80% requirement; however they were all well above the 50% 'Primary' score and exceeded 70% overall. I support the retention of these Areas because of the significant contribution of the 'Primary' sites to the value of these Areas.

36. Following identification of the Character Areas, development parameters to maintain the values of each Area were identified.

The Character Areas recommended as a Qualifying Matter

37. **Table 1** provides a summary of Character Areas included in the District Plan and the outcome of evaluations carried out to identify Character Areas as Qualifying Matters under PC14¹⁷, (including of new areas) requested following early notification of draft PC14¹⁸.

Table 1: Summary of Character Areas included in District Plan and PC14

Operative District Plan #	Character Area	PC14 Stage 1 Desktop Assessment	PC14 Stage 2 Site by Site Assessment	PC14 Stage 2A Assessment ¹⁹
CA1	Esplanade	Do not include	Do not include*	
CA2	Clifton	Do not include	Do not include*	
CA3	Cashmere	Reduce	Reduce	
CA4	Beckenham Loop (including Tennyson Street frontage only)	Reduce	Reduce	
CA5	Tainui	Retain	Retain	
CA6	Piko	Reduce	Reduce	
CA7	Heaton	Reduce	Reduce	
CA8	Beverley	Retain	Retain	
CA9	Ranfury	Retain	Retain	
CA10	Massey	Retain	Retain	
CA11	Malvern	Retain	Reduce	
CA12	Severn	Retain	Retain	
CA13	Francis	Reduce	Reduce	
CA14	Dudley	Reduce	Reduce	
CA15	Englefield	Reduce	Reduce	
Included	Lyttelton ²⁰	Include	Include	Include

¹⁷ Boffa Miskell, 'Investigating of Qualifying Matters Otautahi Christchurch Suburban Character Areas', 17 October 2022 (updated from 1 June 2022 version) / Investigating of Qualifying Matters Lyttelton Character Area', 26 July 2022.

¹⁸ Investigating of Qualifying Matters Otautahi Christchurch Suburban Character Areas – Stage 2A Addendum Report', 17 October 2022.

¹⁹ Areas requested through PC14 pre-notification.

²⁰ The boundary of the Character Area increased as a result of the review.

	Roker/Penrith			Include
	Ryan			Include
	Bewdley/ Evesham			Include
	Ashgrove			Do not include
	Mountford			Do not include
	Woodville			Do not include
	Mersey Street (South)			Do not include

38. The boundary of the areas in some instances was altered further to exclude properties not visible from the street, to enhance the percentage scores overall and more accurately represent the Character Area. Where there were large clusters of rear sections that could not be seen (and classified as Neutral), many of these were removed from the Character Area, unless they could be considered part of a consistent, coherent streetscape or sensible grouping overall.

Development parameters and PC14 provisions

39. Generally, the level of development directed by the MDRS and Policy 3 of the NPS-UD would be inappropriate in the Character Areas. However, some level of development may be appropriate that could maintain and enhance the special character values attributed to the Character Areas. In considering future development potential, a set of 'design parameters' were therefore identified in the context of each Character Area (later referred to as development parameters)²¹.

40. It is important to note that an increase in density and redevelopment in accordance with the MDRS may take place in a number of ways, and result in a range of potential issues impacting on the character attributes of an area. The Boffa Miskell reports²² set out a number of potential development scenarios, and Appendix 37 of the Council's s32 at section 4.1²³ identifies a range of issues arising from development. These include:

²¹ Boffa Miskell, 'Investigating of Qualifying Matters Otautahi Christchurch Suburban Character Areas', 17 October 2022 (updated from 1 June 2022 version) / Investigating of Qualifying Matters Otautahi Christchurch Suburban Character Areas – Stage 2A Addendum Report', 17 October 2022 / Investigating of Qualifying Matters Lyttelton Character Area', 26 July 2022.

²² Boffa Miskell, 'Investigating of Qualifying Matters Otautahi Christchurch Suburban Character Areas', 17 October 2022 (updated from 1 June 2022 version) / Investigating of Qualifying Matters Otautahi Christchurch Suburban Character Areas – Stage 2A Addendum Report', 17 October 2022 / Investigating of Qualifying Matters Lyttelton Character Area', 26 July 2022.

²³ CCC PC14 s32 Report, Appendix 37, dated January 2023.

- (a) Loss of coherence and consistency of built character elements;
 - (b) Poor consideration of site layout impacting on landscape quality, including streetscape and relationship between the site elements and the street; and
 - (c) Loss of the original dwelling, particularly where they make a primary contribution to the character of the area.
41. These issues, amongst others, can contribute to, or detract from the coherence and integrity of a Character Area. As noted in Section 4.2 of Appendix 37 of the Council's s32, the level of impact on the character attributes is dependent on the variables that contribute to the Character Area values and are relevant considerations in how these values might be managed, particularly the primary contributors to an area given they contain the majority, or all the values that underpin an Area²⁴.
42. In response to the design parameters, the Council Urban Designer undertook technical analysis of a range of provisions²⁵, including built form standards, assessment matters and design guidance. As part of this, the Council's Urban Designer outlined a series of recommended provisions intended to manage four key aspects that contribute to the special character values – area context, street interface, site character and built character. A summary of the provisions recommended for Character Areas²⁶ and largely implemented through PC14 are set out by the Council's s32 report.
43. The proposed rules for the Character Areas contained in PC14 differ depending on the character values of each area (Type of Character Area). A density rule is proposed enabling sites to include two units (Rule 14.5.3.2.7). In relation to subdivision, a range of minimum net site areas are outlined for different Character Areas (Table 1 under Rule 8.6.1).

²⁴ CCC PC14 s32 Report, Appendix 37, dated January 2023, section 4.2, page 8.

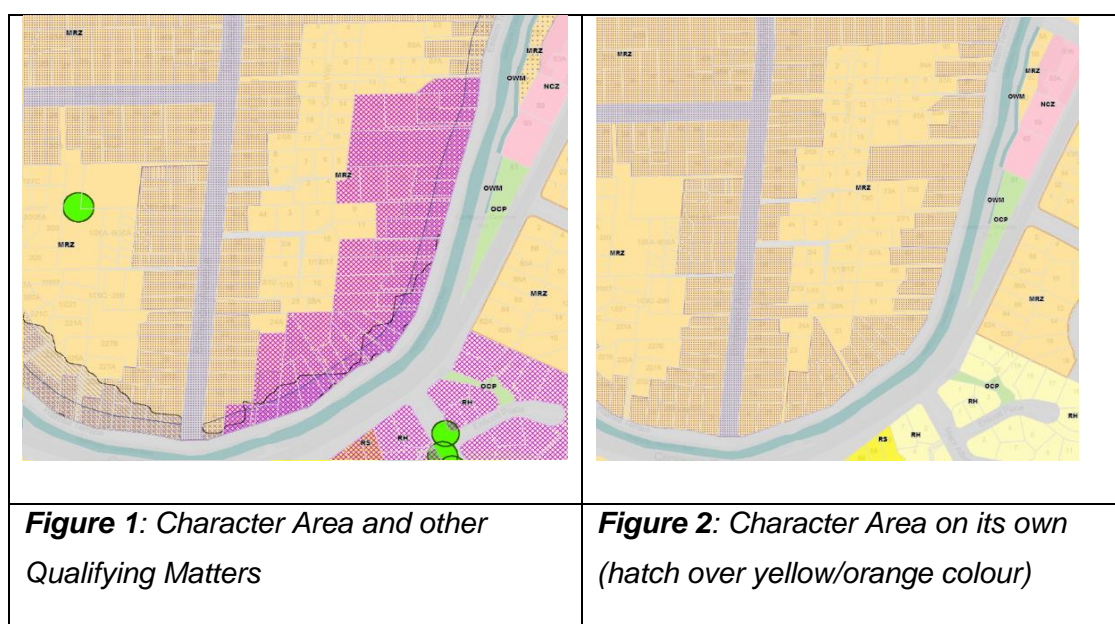
²⁵ CCC PC14 s32 Report, Appendix 37, dated January 2023.

²⁶ CCC PC14 s32 Report, Appendix 37, dated January 2023, page 12 and Appendix 2-4.

SUBMISSIONS RELATING TO MAPPING OF CHARACTER AREAS

Opposition in full or part to identification of Character Areas as a QM

44. A number of submissions seek changes to the proposed Character Area boundaries (Planning Maps). Each of these submissions is discussed below.
45. **Submission 703 – Graeme Boddy - Point S703.1** - The submitter seeks the addition of Eastern Terrace between the iron bridge adjacent to Bowenvale Avenue and the footbridge at Malcolm Avenue into the Beckenham Loop Character Area, due to it being a popular recreational area, with unique riverside trees and shrub planting and a park-like setting.
46. Eastern Terrace was reviewed as part of the Beckenham Loop Character Area in the Beca assessment²⁷ and remains part of that Character Area (see **Figure 1** below). It is unclear on the PC14 map viewer prepared by CCC due the overlaid QMs (i.e. Low Public Transport Accessibility Area, Water body Setback, High Floodplain Hazard Management) and the Residential Character Area, that this portion of the Character Area is indeed proposed as a QM.



47. **Submission 769 – Megan Power - Point S769.9** - The submitter seeks an amendment of the proposed Beckenham Character Area

²⁷ Beca, Christchurch Suburban Character Areas Assessment, 9 January 2025.

to match the operative District Plan extent, including inclusion of all sites within the operative extent within the Character Area (i.e. rear sites also). The submitter notes that the exclusion of some rear sites and mid-block areas appears to conflict with the outcomes sought in the Subdivision Chapter, such as in 8.7.8 Additional Matters – character areas, particularly: *ii. the form, pattern and grain of subdivision, including the size of sites; iv. the retention of large scale, mid-block vegetation and tree planting; and v. the continuity and coherence of the area.*

48. The submitter notes that, under the operative District Plan, development in the Beckenham Character Area of rear sites has been excluded from controlled activity assessment, with the controls applying to street fronting sites only. They outline that there has, however, been limited risk to the degrading of the Character Area due to the lower density provided for through the operative **RSdT** provisions which extend across the entire operative extent of the Character Area. The submitter suggests that rear sites could be included within the Character Area, but without the full set of RDA provisions, to recognise that the sites do not have a direct interface with the street, but nonetheless do contribute the Character Area values.
49. In response, in my view it is appropriate that rear sites are excluded from the protections provided by the Beckenham Character Area. As outlined earlier, the methodology to define Character Area boundaries involved classifying the sites into Primary, Contributory, Neutral and Intrusive. Most rear sites were classified as Neutral which was defined as a site with buildings, structures, landscape, garden and other features that neither defines, supports or detracts from the character of the area. At the south end of the Beckenham Character Area, there were large clusters of rear sites that could not be seen from the street and were therefore largely classified as Neutral. The methodology generally requires at least 50% of sites to be primary, and 30% contributory (noting that in some cases a combination of primary sites well above 50% and exceeding 70% have been recommended). Under the 2015 Character Assessment and District Plan boundary, the Beckenham Loop Area just met the 50% primary threshold, but only reached 59% primary and

contributory overall. Therefore, while the form of the Beckenham Character Area is coherent and contained by the river, it was recommended to exclude large neutral groupings from the Character Area given they were not visible from the street and did not contribute to the values of the Character Area. Under the proposed reduced boundary, the primary sites represent 61% of the Area and the Area reaches 72% overall.

50. **Submission 228 – Martin Winder - Point S228.1** - The Submitter requests that the property at 75a Hackthorne Road is excluded from the Cashmere Character Area as the site is vacant, has no character value and the overlay will reduce the ability for the property to provide for 3 units under the MDRS. The Submitter notes that the next door property No.75 sits outside the Character Area given it is a rear lot.
51. In response, I firstly note that the address of the vacant site being referred to is 75 Hackthorne, while the rear dwelling is 75a. Despite the property in question being vacant and therefore a 'neutral' classification, in terms of its contribution to the character of the Cashmere Character Area, it has been incorporated because it fronts the Character Area street, includes an original stone wall and is part of a grouping of properties along this extent of Hackthorne Road.
52. **Submission 499 – Daniel Rutherford – Point S499.3** –The submitter requests the removal of 20/20b Macmillan Avenue from the Cashmere Character Area. This is due to the home having no historically significant owners, having not been designed by a significant architect and having limited visibility from the road due to established gardens and a garage.
53. In response, I consider that the established gardens, sloped topography, building form, setbacks and materials are all characteristics or attributes than contribute to the wider Cashmere Character Area. Despite having a 'neutral' property score in terms of its contribution, it has been incorporated because it fronts a Character Area street and is part of a consistent, coherent grouping overall.

54. **Submitter 1 - Polly Grainger - Point S1.1** – The submitter requests inclusion of Bewdley Street and Eversham Crescent within a Character Area. The reasons noted were that *‘all but one of our remaining homes are in their original style. There are three gaps where the houses have been ripped down but not yet built on.’*
55. In response, I can confirm that this area was investigated as part of our original assessments and is included within the Bewdley Character Area in PC14 as notified.
56. In conclusion, I recommend that no changes be made to the Planning Maps as set out in PC14 in response to these submissions.

Requests for new Character Areas

57. A number of submitters have requested the addition of new Character Areas as Qualifying Matters. These include the following areas:
- (a) Helmores Lane, Desmond Street and Rhodes Street (to Rossall Street),²⁸ with another submission²⁹ proposing a broader area bounded by Holmwood Road, Rossall Street, Hagley Park and Fendalton Road;
 - (b) Ashgrove Terrace, Fairview Street, Cashmere View Street (and Rose Street);³⁰
 - (c) Jane Deans Close;³¹
 - (d) Scott Street;³²
 - (e) Forfar Street;³³
 - (f) Merivale (including Rugby Street, Merivale Lane and surrounds);³⁴
 - (g) Gwynfa Street;³⁵

²⁸ Submissions 62, 86, 119, 164, 165, 255, 376, 381, 502, 530, 664, 665, 698.

²⁹ Submission 584.

³⁰ Submissions 15, 18, 19, 20, 25, 27, 92, 101, 124, 125, 126, 162, 197, 227, 581.

³¹ Submissions 182, 188.

³² Submission 241.

³³ Submission 247.

³⁴ Submission 316.

³⁵ Submission 726.

- (h) Ballantyne Avenue³⁶
 - (i) Papanui Road to Watford Street;³⁷
 - (j) Matai Street,³⁸
 - (k) Knowles Street, Rutland Street, Papanui Road, Dormer Street,³⁹ Normans Road, Blighs Road, (and alignment with the Railway line)³⁹ and
 - (l) Gloucester Street, Woodham Road, Trent Street, England Street.³⁹
58. An assessment has been undertaken of each of these areas, applying the 'Character Area as a Qualifying Matter Phase 1 and 2 methodology' (summarised above). **Appendix A** to my evidence sets out in detail this assessment.
59. A high-level summary of the findings of the **Phase 1 Preliminary Assessment** is set out below:
- (a) *Helmores Lane, Desmond Street and Rhodes Street (to Rossall Street)⁴⁰ and broader area bounded by Holmwood Road, Rossall Street, Hagley Park and Fendalton Road* – The landscape character and setting of an area is an important attribute and can contribute to a distinctive residential environment and be part of the Character Areas methodology.⁴¹ However, it is also important that the built character is consistent and cohesive being a key attribute of the character area methodology. As such, I consider that overall there is not sufficient consistency in the built character of this area for it to be assessed under the Phase 2 methodology.
 - (b) *Ashgrove Terrace, Fairview Street, Cashmere View Street (and Rose Street)* – Street trees are part of the character of Rose Street and Ashgrove Terrace, but less so on Fairview and Cashmere View Streets. The park⁴² is a key component of

³⁶ Submission PC13 683.

³⁷ Submission 868.

³⁸ Submission 188.

³⁹ Submission 737.

⁴⁰ Submissions 62, 86, 119, 164, 165, 255, 376, 381, 665, 698.

⁴¹ As discussed above, the methodology used is a continuation of the Beca methodology.

⁴² Cashmere View Playground.

the street layout and character of the neighbourhood. The built characteristics of this area are similar to 'Type 3' of the categorised Character Areas⁴³. Overall, there appears to be a high level of character values and the area was recommended to be assessed under the Phase 2 methodology (which has since been carried out, as discussed below). With regards to 1/19 Fairview Street, I note that single dwellings cannot form a Character Area.

- (c) *Jane Deans Close* – I do not consider the street to be sufficiently consistent in built and landscape character to be assessed under the Phase 2 methodology.
- (d) *Scott Street* – Consistency in the scale, form and architectural style of dwellings in Scott Street are evident from the desktop analysis. The characteristics of this area are similar to 'Type 2' of the categorised Character Areas⁴⁴. Overall, there appears to be a strong cluster of workers' cottage examples south of Deyell Crescent and a moderate level of character, such that this area merited assessment under the Phase 2 methodology (discussed below).
- (e) *Forfar Street* – Although there are original examples of 1920/30s bungalows and villas, there is also a mixture of more modern single-storey dwellings, older multi-unit developments and new 2-storey units. The characteristics of the original dwellings in this area are similar to 'Type 4' of the categorised Character Areas⁴⁵. However, overall, I consider there to be insufficient consistency in the character values for the area to be considered under the Phase 2 methodology.
- (f) *Merivale (Rugby Street, Merivale Lane and surrounds)* – Overall there is insufficient consistency in the character values of the area for it to be assessed under the Phase 2 methodology.

⁴³ Investigation of Qualifying Matters - Ōtautahi Christchurch Suburban Character Areas, Boffa Miskell, 17 October 2022.

⁴⁴ Investigation of Qualifying Matters - Ōtautahi Christchurch Suburban Character Areas, Boffa Miskell, 17 October 2022.

⁴⁵ Investigation of Qualifying Matters - Ōtautahi Christchurch Suburban Character Areas, Boffa Miskell, 17 October 2022.

- (g) *Gwynfa Street* – Overall there is insufficient consistency in the character values of the area, particularly in building age and architectural style and materials, for it to be assessed under the Phase 2 methodology.
 - (h) *Ballantyne Avenue* - Consistency in the scale, form and typology of Ballantyne Avenue are evident from the desktop analysis. The characteristics of this area are similar to ‘Type 5: Piko’ character area type⁴⁶. Overall, there appears to be a strong consistent character with examples of 1950’s state housing and it is recommended this area should be reviewed under the Phase 2 methodology.
 - (i) *Papanui Road to Watford Street* – There appears to be some strong representations of the ‘Type 4’ character attributes within the area and as a result it is recommended that the area be assessed under the Phase 2 methodology (as has occurred). The key difference with the Type 4 character is that there are more examples of two-storey dwellings.
 - (j) *Matai Street* – Overall, there is insufficient consistency in character, particularly in building age and architectural style and material and therefore this area is not recommended for review under the Phase 2 methodology.
60. The subsequent **Phase 2 assessment** was completed with the following conclusions made, with details of these assessments included in **Appendix A**:
- (a) **Ashgrove Terrace, Fairview Street and Cashmere View Street** – I consider that the character of Cashmere View Street is such that it merits protection as a Character Area under PC14. It shares common attributes with the ‘Type 3’ Character Areas as identified in Stages 1 and 2. Therefore, it best aligns with the Type 3 ‘design parameters’.
 - (b) **Scott Street** – Based on the more detailed Phase 2 assessment, I do not consider Scott Street to meet the level of

⁴⁶ Investigation of Qualifying Matters - Ōtautahi Christchurch Suburban Character Areas, Boffa Miskell, 17 October 2022.

consistent built or landscape qualities anticipated for a Character Area.

- (c) **Papanui Road to Watford Street** – Likewise, I do not consider Watford Street to meet the level of consistent built or landscape qualities anticipated for a Character Area.
- (d) **Ballantyne Avenue** - Based on the more detailed Phase 2 assessment, I do not consider that Ballantyne Avenue meets the level of consistent built or landscape qualities anticipated for a Character Area.

Neighbourhood wide and SAM character area requests

- 61. A number of neighbourhood wide Character Areas were requested through submissions, including:
 - (a) Greater Cashmere area, and all other areas with established trees and gardens,⁴⁷
 - (b) Somerfield and Lower Cashmere;⁴⁸ and
 - (c) Hornby and South Hornby, Sockburn, Hei, Islington and Broomfield.⁴⁹
- 62. The submissions covered extensive areas, larger than any proposed Character Areas. Each area is described in more detail in **Appendix A**.
- 63. As outlined in my evidence, Character Areas have been determined through a detailed assessment as a result of previously being a SAM over time or having been identified through the consultation undertaken on PC14 and then fully assessed. The methodology for identifying Character Areas relies on a site-by-site assessment against consistent area attributes. In relation to wider neighbourhood areas, the range of building ages, development patterns, materials, building style, typology, form, height, and the level of change at the neighbourhood wide scale makes it difficult to determine consistent character attributes.

⁴⁷ Submission 303.

⁴⁸ Submission 710, 1006.

⁴⁹ Submission 1090.

64. There may be pockets of intact character where an assessment utilising the established methodology could be undertaken, however, these nuanced areas have not been specifically identified by the submitters. As such, I consider that these areas do not meet the level of consistent built or landscape qualities to be recommended as a Character Area.
65. A few submissions related to previously requested areas, including Mersey Street South⁵⁰ and Woodville Street⁵¹. Woodville Street was investigated in July 2022⁵², and it was removed from consideration because, while it achieved the 50% Primary threshold, it did not meet the 80% threshold overall (with only 12% Contributory). As such, no further assessment has been undertaken.
66. Mersey Street South was also investigated in July 2022⁵³, and it was removed from consideration as it did not meet the 50% Primary or 80% overall threshold, achieving 43% Primary and 17% Contributory. Adding it to the Severn Character Area as requested by the submitter would undermine and dilute the overall scoring of the Severn Character Area (see graphs and assessment material in **Appendix A**). As such, no further assessment has been undertaken.
67. **Submitter 737**⁵⁴ requested that all the previous SAMs from the 1995 City Plan be reinstated with particular focus on:
- (a) Totara/Hinau/Puriri – SAM 7 and 7A;
 - (b) Opawa - SAM 5;
 - (c) St James – SAM 16 (plus Windermere Road); and
 - (d) Fendalton – SAM 8.
68. At the time of the Christchurch Replacement District Plan (**RDP**) 2015 process, many SAM's lost their Character Area status following a desktop review of 'resource consents and visual

⁵⁰ Submission 278.

⁵¹ Submission 755.

⁵² Appendix 22, S32 report. *Investigation of Qualifying Matters Ōtautahi Christchurch Suburban Character Areas – Stage 2A Addendum Report* - Boffa Miskell, 17 October 2022.

⁵³ Appendix 22, *Investigation of Qualifying Matters Ōtautahi Christchurch Suburban Character Areas – Stage 2A Addendum Report* - Boffa Miskell, 17 October 2022.

⁵⁴ Submitter 737 Christian Jordan.

assessment⁵⁵ due to a higher threshold of primary and contributory buildings required to become a Character Area. This RDP methodology was endorsed by the Independent Hearings Panel at the time. As such, any further assessment during the PC14 process, and in response to submissions, has not been undertaken as it considered that the review undertaken, and decision made in 2015 remains relevant.

SUBMISSIONS RELATING TO DISTRICT PLAN PROVISIONS

Overview

69. As noted earlier, the planning framework proposed in PC14 for Character Areas is set out in the PC14 provisions and Council's s32 Report. Overall there is a change from the controlled activity status adopted in the operative District Plan (with zone standards) to a range of activity statuses. This includes permitted (internal conversion of existing dwelling), controlled (new units behind the principal dwelling subject to standards) and RDA (excluding accessory buildings less than 30sqm, less than 5m in height and to the rear of the main dwelling), with area-specific built form standards relating to controlled activities, and site density and landscaping requirements relevant to RDAs.
70. A number of submissions seek changes to activity status along with removing the built form standards or seeking amendments to make them less restrictive. These submissions are dealt with in full in Ms White's evidence. Ms White has however asked me to address a number of questions relating to these particular submissions from an urban design perspective, and in particular what impact potential changes could have on the Character Areas. The questions include:
- (a) Is the extent to which the scale of development anticipated under the current underlying zonings of the Character Areas (i.e. Residential Suburban (**RS**) zone and Residential Suburban Development Transition (**RSDT**) zone) consistent with the attributes that contribute to the values of character

⁵⁵ Appendix 19 of the s32 Report for Residential Chapter 14, notified 2 May 2015. Background Report on Character Areas, Christchurch City Council. DRAFT SECTION 32 (ccc.govt.nz).

areas? How will this change with an underlying Residential Medium Density zoning?

- (b) What are the potential impacts of the application of MDRS on the values that contribute to the character of the different Areas?
- (c) Would the introduction of proposed built form standards specific to the attributes of the Character Areas overcome the issues currently associated with the Controlled Activity status?
- (d) What impact will development of HRZ adjoining Character Areas have on their values?
- (e) In relation to the specific built form standards proposed in PC14:
 - (i) Are the 'thresholds' appropriate for maintaining the existing character values?
 - (ii) What are the likely effects if development breaches these thresholds?
 - (iii) Are there any standards that could be more enabling while still maintaining existing character values?
 - (iv) Any there any standards that might be better assessed through the consent framework (i.e. controlled or RDA) rather than having a specific limit applied?

71. I concur that these are relevant urban design questions arising from the submissions, and I address them in turn below.

Underlying zoning and alignment with Character Area values

72. The current underlying zones for the Character Areas in the operative District Plan include the RS, RSDT and the RMD zones. Table 14.2.1.1a of the Plan sets out the intent of each of these zones, with the RS Zone, for example, providing for "*traditional type of housing in Christchurch in the form of predominantly single or two*

*storeyed detached or semi-detached houses, with garage, ancillary buildings and provision for gardens and landscaping*⁵⁶.

73. The 'traditional type of housing' referred to includes, amongst others, the housing typologies included in a number of the Character Areas. As a result of this context, the location, scale and form of development anticipated in the RS zone (by way of the built form standards providing for matters such as detached houses, site coverage, building setbacks and height) broadly seek to continue this overall character, and as a result provide for a built form outcome that is broadly consistent with the dwellings found within a number of the Character Areas. There may be some inconsistencies between the current built form standards and the attributes of the Character Areas, but broadly speaking the provisions align with a number of the character attributes.
74. Both the RS and RSDT zones do, however, anticipate some transition in built form outcomes, providing for a range of housing opportunities and low and medium density residential development. While this will result in some increase in residential density, it is likely, in my view that this change in scale and form of development will result in loss of character values.
75. The MDRS sets out a transition to a new urban character as generally required by the NPS-UD. Given this (subject to qualifying matters), the scale and form of development as a result of MDRS as the underlying zone would result in a clear departure from the key character attributes of the various Character Areas along with the anticipated built form outcomes through the current zoning, unless Character Areas are provided as a qualifying matter.
76. In summary, the existing zones provide for a scale and form of development that is broadly consistent with the majority of the character area values, albeit the appearance of buildings may be different. Development enabled under the MDRS will be visibly different in scale and form and also potentially appearance and will result in an obvious change in the environment.

⁵⁶ Christchurch District Plan, Table 14.2.1.1a, Residential Suburban Zone

Impacts of MDRS on Character Area values

77. In the absence of any other built form standards (such as those proposed in PC14 for Character Areas, due to them being a qualifying matter) the built form standards of the MDRS would apply to each of the Character Areas.
78. As such and noting my comments above regarding the anticipated built form in areas zoned for MDRS development, it is my opinion that the application of the MDRS standards across all the Character Areas would undermine the special character values that contribute to the overall cohesiveness and consistency of the areas. Noting the different Character Area 'Types', applying the MDRS will result in the loss of the different values and the reasoning for the Character Area status, with nothing in the MDRS provisions seeking to retain the characteristics or enhance them. I consider that this will result in areas that are less distinctive and unique in character, with a reduced integrity, coherence and consistency of the built and landscape attributes, that together are of value to the community and create a unique sense of place.
79. As such, in my view the increase in the density of development along with the redevelopment of primary and contributory dwellings will erode the particular values identified in the Character Areas.

Controlled activity status with specific built form standards

80. The current consenting pathway in the District Plan includes permitted and controlled activity status for all Character Areas alongside zone-based, rather than area-specific built form standards.
81. In looking more closely at this approach and its potential benefits and risks, the framework assumes that accessory buildings to the rear of the principal dwelling⁵⁷ will not have an impact on the Character Area values given their permitted activity status. All other activities are controlled. This includes extensions to the principal dwelling, new buildings, and additional units, which are subject to compliance with zone-based built form standards. Assessment

⁵⁷ Less than 5m in height

matters apply for both bulk and location and design and appearance, as set out in Rule 14.15.23.

82. The Council's Technical Analysis⁵⁸ provides context to the challenges faced in managing Character Area values under the existing framework. It is noted that the framework is potentially "(...) *ineffective in ensuring that the character area values are retained and this has undermined the Character Area values and created an adverse precedent, compromising the integrity of the Character Areas*"⁵⁹. Key challenges have included development that is not in keeping with the subdivision pattern or architectural style of the area and garaging dominating the streetscene and impacting the visual connectivity with the primary dwelling, including as a result of the height of front fencing.
83. The Council's Technical Analysis also sets out that it is difficult particularly in relation to redevelopment of sites to apply specific conditions of consent to design matters without a full redesign of a proposal, due to an inability for the Council to refuse resource consent. I concur that this is a key difficulty with a controlled activity consent.⁶⁰ Developments that have not been successfully resolved were evident from site visits undertaken during the preparation of the Character Area assessment report. This was particularly the case with the location, scale and design of garaging and the architectural detailing and quality of the houses (see **Figures 3-6**). As a result, these sites may now be 'neutral' or 'intrusive' in status in terms of their contribution to the overall Character Area.

⁵⁸ CCC Technical Analysis of Proposed Character Area Provisions January 2023, Section 5, page 10-11 and Appendix 6

⁵⁹ CCC Technical Analysis of Proposed Character Area Provisions January 2023, Appendix 6 Evaluation of Design Outcomes in Character Areas

⁶⁰ CCC Technical Analysis of Proposed Character Area Provisions January 2023, Section 5, page 10-11



Figure 3: Garage located in front yard impacts visual connectivity with dwelling.



Figure 4: Architectural form and detailing with limited reference to character attributes.



Figure 5: Reclad of exterior contrasts with character.



Figure 6: Does not reflect key attributes, oversimplification of colours and materials.

84. Relying on zone-based standards also implies that compliance with these standards will achieve an acceptable outcome (and can achieve the built/landscape appearance anticipated) which is not entirely the case and may raise false expectations of a consent applicant.
85. There are also potential risks to Character Area values associated with development behind a principal dwelling. The activity status assumes that the development will not be visible from the public realm, but that may not always be the case and could have an impact on the character values of the area.
86. The introduction of 'specific' area-based built form standards aligning with the key attributes of each Character Area would assist to overcome a number of the issues associated with the current controlled activity approach as highlighted by the Council in its case study research (i.e., location of a garage behind primary dwelling, or a lower height limit). Targeted standards would provide the

opportunity to better align a proposal with the values of a Character Area, managing expectations. Standards, for example in relation to front yard setbacks and garaging and fence heights that align with key values of a Character Area provide the opportunity to maintain the consistency and coherence of the built form within that Area. If standards are exceeded by a proposal, a resource consent process can consider its merits in light of the values of the Character Area. I discuss specific built form standards in more detail below.

87. In relation to achieving the policy intent, I consider that a controlled activity scenario with area-based built form standards would reduce the risks of eroding the character values. However, there would still remain the risk of poor design outcomes, challenges with trying to resolve design issues and the inability for the Council to decline the application. Moreover, standards are often unable to focus on the nuances of design, i.e., proportions of a building, type and use of materials, roof profile, window location and proportions and how garaging is integrated into the overall form. Although conditions can be applied, it is very difficult to adjust the design concept itself in relation to these design matters. Overall, a successful design outcome within a Character Area is one that responds positively to the values as outlined in the Design Guide and Assessment Matters.
88. PC14 proposes a revised framework that includes permitted, controlled and RDA in seeking to better manage outcomes within Character Areas. This includes consideration of a full range of built form standards for controlled activities. An RDA pathway is proposed for most new buildings, and changes to existing buildings. Applications are assessed against the Character Area assessment matters and relevant design guidelines.
89. PC14 proposes to retain a controlled activity status in relation to new residential units located to the rear of the existing dwelling which is less than 5m in height. There is a risk that development behind the principal dwelling is visible from the street and potentially out of character with the Area, but impacts are reduced given their location on the site. Conditions could be imposed to refine the design and appearance in reducing the impacts.

90. Rule 14.5.3.1.3 RD14 proposes that most new buildings, as well as alterations and additions to existing buildings, fences and walls, and building demolition/removal over 30m² are RDA. All proposals are assessed against the full suite of assessment matters set out in 14.15.27 relating to character areas. These cover the range of considerations in relation to development within a Character Area, including area context, site character and street interface and built character. In addition, there are two rules relating to the number of residential units and landscaping in Character Areas, which if not met, are expressly specified as a RDA as well⁶¹.
91. Therefore, the built form standards relevant to controlled activities do not strictly apply to building works managed under RD14, i.e., the standards around building height, front entrances and facades, setbacks coverage, windows to the street etc. This is unfortunate, in my view, and potentially a drafting error, given many of the standards included under Rule 14.5.3.2 are not relevant to what is covered under a controlled activity, i.e., residential units to the rear of the principal dwelling. While they would still likely be considered in determining a consent application required under Rule 14.5.3.1.3 RD14, my preference would be for PC14 to be amended so that all the built form standards are clearly applied to activities managed under this rule. I consider that this would make the RDA framework more robust as it would signal to an applicant the layout, built form and relationship of the building with the street that is expected within a Character Area that would maintain the Character Area values.
92. If all the built form standards are not strictly applied to activities managed under the RDA rule, then at a minimum, the suite of standards should include those that I consider to be a priority in establishing the form/scale and location of an addition or new building. The standards that apply explicitly for developments to the rear of the dwelling would remain applicable for controlled activities. I discuss this matter further later in my evidence.
93. Generally, in my view the RDA process will enable consent applications for proposals that would have poor design outcomes, not aligning with the policy intent, to be declined or publicly notified

⁶¹ Rule 14.5.3.2.7 and 14.5.3.2.12.

in relation to effects on the values of the Character (and wider environment) with more room for the Council to ensure that the proposal achieves a design solution that aligns with the Character Area values. The RDA process will also encourage pre-application design discussions and application of the design guidelines in improving both the design and the process, reducing the risk of poor outcomes. As such, the RDA framework enables the ability to respond to specific design proposals where they might deviate from the built form standards, and to take into consideration relevant assessment matters and design guidelines. In this way, larger scale proposals including intensification can be tested for appropriateness against the Character Area values.

94. I note that a potential dis-benefit is the possibility that an RDA process will discourage infill and intensification as the activity status is potentially signaling to a prospective developer that there is less room for change.
95. Overall, however, my view is that there is a greater ability to secure a good design outcome with an RDA status with the process providing the opportunity to overcome a number of the issues highlighted through the case studies and the Character Area assessments. As a result, I support the existing framework being retained with some refinements to the built form standards applicable to the RDA rule, as this better aligns with the outcomes sort through the policy framework. The framework has incorporated a level of 'enablement', albeit this does include some level of risk that the character area values may not be fully maintained. I also consider that the RDA status reflects the value of Character Areas within the community and bearing in mind the change that has occurred post-earthquake and as housing density across the city increases.
96. Further, I consider the assessment matters to be broadly appropriate, subject to some refinement to avoid double dipping with relevant standards.

Impact of High Density Residential Zones adjoining Character Areas

97. A number of the smaller Character Areas are located within or adjoining high density residential areas (e.g. Beverley, Ranfurly,

Heaton and Englefield). In this part of my evidence, I comment on the effect that development surrounding these Character Areas may have on their values.

98. As an initial comment, I expect that the development of the adjoining neighbourhood will occur at much greater height limits and density as enabled by the provisions applying in the HRZ. Although such development will not directly impact the values within the Character Area themselves, how a person appreciates the different Character Areas, and their setting, will be adversely effected.
99. This scale of anticipated development adjoining the Character Area will include apartment building typologies. The potential scale of buildings will result in a greater contrast with the key attributes within these particular Character Areas, some of which are characterised by detached, single-storey dwellings located within sites where there is a level of openness in line with a low density and/or intimate, finer-grained pattern of development. This contrast will be heightened (and the neighbouring development potentially more dominant) where the Character Areas are smaller in extent. In addition, the more consistent and cohesive the Character Area is (in contrast to an area that includes a variety of house styles and sizes) will also likely result in a greater contrast between the Character Area and the neighbouring zone.
100. The visual prominence of high density development (i.e. apartment typologies) could impact (negatively) on the community's appreciation of an area's values and this may be exacerbated depending on the built form and appearance of the buildings as a backdrop to the Character Areas. In the case of Englefield in particular, where the dwellings comprise mainly small workers cottages on small lots, the scale of impact is potentially greater given the Character Area's individual qualities. As such, this Area is considered to be more vulnerable than those that include larger-scale housing within bigger lots and with significant trees.
101. Also in relation to the Englefield Character Area, the Character Area boundary in some instances extends beyond the boundary of the Residential Heritage Area (**RHA**). I have considered whether the boundary of the Character Area should change to align with that of

the RHA. This would result in the sites identified by the blue boundary in **Figure 7** being removed from the Character Area.

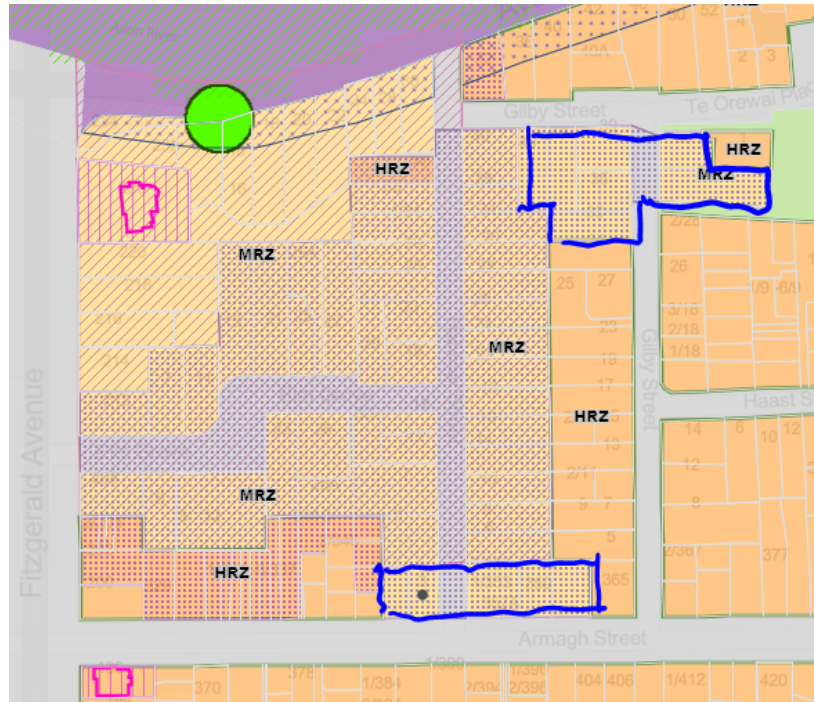


Figure 7: Englefield Character Area where it extends beyond the RHA (blue outline)

102. To consider this, I reassessed the Character Area utilising the methodology outlined earlier in my evidence. Most of the properties highlighted in blue in **Figure 7** were categorised as 'primary', with one 'contributory' and three 'neutral'. The sites at each end of Hanmer Street are also important in terms of how the Character Area 'reads' providing a sense of arrival into the Character Area and a visual transition from the neighbouring area. It is noted that the two properties on either corner of Armagh Street and Hanmer Street are 'neutral' and are not original dwellings. However, if they are removed from the Character Area, the properties to the east which are 'primary' would be isolated from the Hanmer Street properties. At the northern end the Character Area extends into Gilby Street and Te Orewai Place. Therefore, on balance, I consider that retaining these properties within the Character Area is important to maintain the integrity of the Area. I further note that heritage considerations have not been a determining factor in the identification of the boundaries of the Character Area.

103. In relation to the Dudley Character Area, Mr Kleynbos is recommending an extension to the walkable catchment associated with the HRZ adjoining the Shirley Commercial Centre. This extended catchment will partially overlap with the Dudley Character Area to the south of Shirley Road (see **Figure 8**).

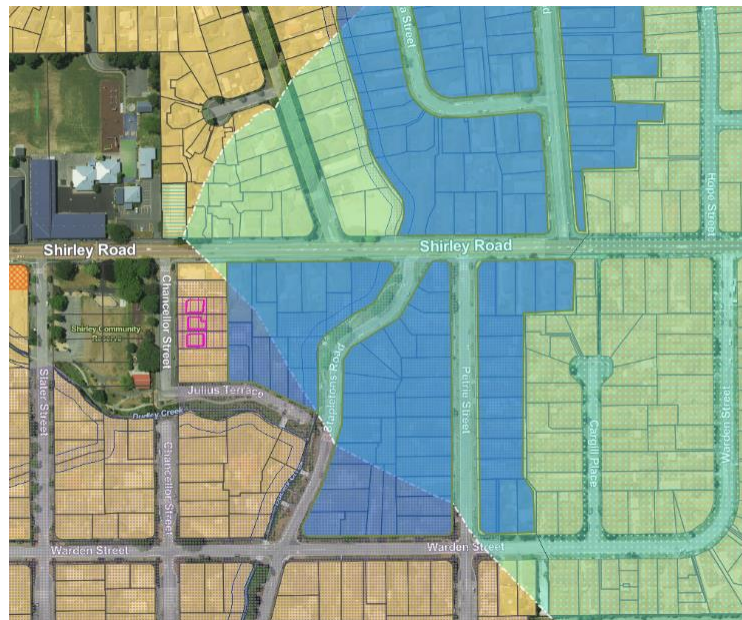


Figure 8: *Overlap of walkable catchment (green shape) over the Dudley Character Area (all lots highlighted blue and purple below Shirley Road)*

104. As a consequence of the above, Ms White has asked me to consider whether the potential removal of the properties located to the south of Shirley Road and coloured blue/purple in **Figure 7** from the Dudley Character Area, thus enabling intensification in this location, would adversely affect the character values of the area.
105. As such, I have re-assessed whether the remainder of the Dudley Character Area would meet the threshold tests set out earlier. **Figure 8** sets out the results of this assessment, with the revised boundary of the Character Area exceeding the 50% primary threshold at 65%, with 7% contributory. Although not meeting the overall 80% threshold for both primary and contributory sites, the area includes 65% primary properties, which is a similar outcome to the original assessment, and the combined primary and contributory sites remains at 73%. The removal of these properties will not impact on the overall integrity of the Character Area or its cohesiveness.

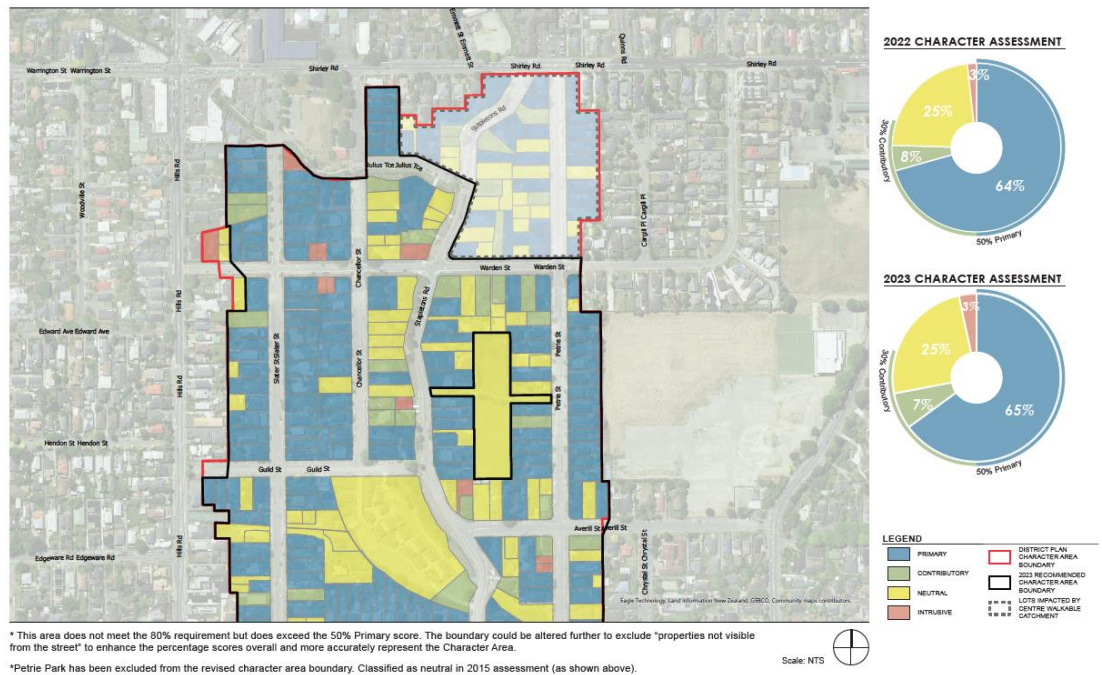


Figure 8: 2023 Character Assessment for Dudley Character Area

Changes to built form standards

106. As set out in my evidence, a number of specific submissions have been received in relation to the built form standards and Ms White has requested that I address a number of questions associated with these. In addition, as part of considering the activity status earlier in my evidence, I also discuss standards relevant to the different scenarios.
107. Appendix 3 of the Council's *Technical Analysis of Proposed Character Area Provisions*⁶² is helpful in providing a summary of the various standards by Character Area 'Type' in comparison to the MDRS standards (noting that in PC14, a separate recession plane provision has not been applied to Character Areas, with the zone-based recession planes applying). As explained by the Council in its Technical Report, the standards have been established in response to the 'design parameters' outlined in the Boffa Miskell reports and are largely informed by existing patterns of development, with some variations to align where appropriate with the MDRS. The standards have been tested by the Council through a 3D modelling exercise⁶³.

⁶² CCC PC14 s32 Report, Appendix 37

⁶³ CCC PC14 s32 Report, Appendix 37

108. The standards seek to maintain the character area values, particularly the form and scale of development. However, it is more difficult to manage appearance effects through standards. There may be some flexibility to tweak the standards (both the metric specified, and/or the number of the standards proposed). However, in my view, the appropriateness of any changes are dependent on the activity status, i.e. an RDA could potentially have fewer standards given there is greater reliance on a qualitative assessment and application of assessment matters. Any changes also need to be considered in the context of the issues raised by Council and observed during site visits to each Character Area.
109. Generally, the proposed suite of built form standards provide a framework for managing change in each Character Area. The likely effects if development breaches the specified built form standards will vary depending on the nature of the proposal. It is possible that a breach of the standards, i.e. additional height or a reduced front yard setback could contribute to diminishing the character of the area (depending on the extent of the breach), including the overall integrity and cohesiveness of the area beyond the site resulting in a different development pattern outcome. This may undermine the defined character values of the area, with potential cumulative effects resulting from multiple breaches of the standards that will further erode the character of the area as a whole.
110. Generally, in relation to controlled activities, given it is not possible to decline an application, I consider a comprehensive suite of standards is necessary to achieve a consistent design outcome with the character area values (in conjunction with conditions of consent to address appearance issues).
111. If the Panel is minded to adopt a controlled activity framework overall, I do not consider that there are any built form standards proposed in PC14 that are unjustified in seeking to manage change in alignment with key character values. The package of standards are expected to minimise adverse effects arising from unsympathetic development within the different Areas. Therefore, I consider that all the built form standards are a 'must have' and the thresholds identified (noting I have recommended some small

amendments to these) allow for a measure of increased residential density without the loss of character values.

112. Regarding an RDA, and although there is an assumption of a more 'qualitative' approach, my preference is to apply the suite of area-specific area standards (as outlined for a controlled activity under PC14) to provide clarity around the scale and location of future development within Character Areas. Although this approach may be viewed as a more restrictive or precautionary approach, in order to maintain and enhance the special qualities that make these areas distinctive and appealing, I consider this approach has the greatest chance of aligning with the policy intent.
113. It may be possible to reduce the number of the specific area standards given the ability to assess individual proposals and decline proposals, with some standards given greater priority. However, it is important to note that there are multiple options that could be applied, and any package does require careful testing to understand the interrelationship between the different standards and their impact on developability of a site and maintaining character area values. In addition, if a consent applicant wishes to do something different, to that envisaged by the standards, then an application for resource consent can be assessed against the relevant assessment matters.
114. In relation to priority standards, I consider that these include those that focus on the size of a lot and the location and built form of a proposal, as follows:
 - (a) Building height – This has a potentially significant impact on Character Area values, with the height of buildings being a key value that contributes to the consistency of development when viewed from the street and within its immediate surroundings within the Character Area. Policy 14.2.5.7 specifically refers to maintaining the scale and form of buildings and building height is related to this.
 - (b) Road boundary setback with a landscape strip requirement – Maintaining a consistent setback or alignment of houses along a street creates a coherent built edge and in some cases is linked to the extent of spaciousness of a property when viewed

from the public realm. Planting within the front setback contributes to the amenity of the property as viewed from the street. Policy 14.2.5.7 refers to the pattern of development relating to buildings, open space and streetscape as a key element in maintaining and enhancing identified special character values.

- (c) Side yard setbacks – Side yards provide space around the dwelling and contribute to the street appeal providing vegetation alongside dwellings and a balance between the house and garden size. As with the road boundary setback, Policy 14.2.5.7 refers to the pattern of development relating to buildings, open space and streetscape as a key element in maintaining and enhancing the identified special character values.
- (d) Building coverage (net site area) – The building footprint relates to the spaciousness of the site and helps to manage the bulk or size of the dwelling and is a key attribute in the character of an area. As with the side yard setbacks, Policy 14.2.5.7 refers to the pattern of development relating to buildings and open space as a key element with site coverage a method to achieve this balance between building and landscape.
- (e) Rear yard setback and associated landscape strip and tree planting – Given the priority is to manage the public realm interface, the proximity of buildings from the rear yard is less critical. However, a rear landscape strip could enable planting that contributes to a balance between built and landscape elements and helps soften the overall appearance of the site as viewed from the street. Policy 14.2.5.7 refers to features that contribute to the qualities of the landscape, the landscape setting of building and the qualities of the streetscape as elements that contribute to special character values.
- (f) Fencing – Front fences define the interface between the public and private realm and it is important that they do not block the view from the street to allow good visual connection between the house and street. Policy 14.2.5.7 refers to the qualities of

the streetscape as a key element to consider in a Character Areas special value.

- (g) Garage and carport location to rear or side of dwelling – Garages and parking in the Character Areas is generally located to the side or rear of houses. A standard relating to garaging avoids them being located in front gardens and reducing the visibility of the primary dwelling when viewed from the street. This seeks to maintain and enhance the existing patterns of buildings in relation to the street and the overall qualities of the streetscene as outlined in Policy 14.2.5.7.
- (h) Paved access width (driveway) – Driveways (and associated carparking) can undermine the character of the area. Discrete access arrangements ensure the dwelling and landscape maintain their primacy. This standard will contribute to maintaining streetscape character values identified under Policy 14.2.5.7.
- (i) Minimum width of building frontage to street – Achieving a similar scale and proportion of houses ensures a level of consistency and contributes to the coherence of an area. Policy 14.2.5.7 refers to the pattern of development relating to buildings and open space as a key element identified in maintaining and enhancing identified special character values.
- (j) Landscaped areas – These provide for a minimum area of tree and garden planting and in some instances include front setback planting, including trees in achieving integration with the street scene of the specific area and the overall quality and character of a site. The landscape setting and streetscape quality are key elements identified in Policy 14.2.5.7 in maintaining and enhancing identified special character values.

115. Each standard includes a specific threshold or metric that aligns with the Character Area Type. These standards will provide a clear framework and level of certainty as to the layout and form of development that is expected to generally maintain the values of these areas. As discussed earlier, these will enable a consistent

development pattern as viewed from the street and a sense of openness around the dwelling.

116. There are some of the built form standards that could be considered 'nice to have' and are discussed below:

(a) Net site size – The minimum MDRS standard is 450m² for a flat site and 650m² for a hill site. The character area standards range from 450m² to 800m². Given the 'priority standards' relating to setbacks, building coverage and minimum width of building fronting the street, it is possible that these standards would achieve a site size that is broadly consistent with those outlined in PC14 (although this would require further testing and a net site size is a helpful standard in relation to the subdivision process).

(b) Setback of a building from a shared driveway – This standard is considered less critical in achieving a site layout that is consistent with existing development patterns within the different area and could be considered through assessment matters.

(c) Open space per unit (balance of building to open space on site) – This standard is potentially a double-up with the building coverage rule. Given the site coverage provision there is likely to be sufficient space for outdoor living.

(d) Windows facing street – The glazing requirement and the location of a front door could be better suited as an assessment matter (the built character matters refer to architectural detailing including windows).

117. I consider the assessment matters to be comprehensive and effective in managing the location of future development within the context of each specific Character Area, enabling consideration of design nuances. They will support an understanding of what matters need to be considered contextually and how to assess any variations from the standards outlined.

Response to detailed submission points

118. Below I provide feedback on specific submission points.

119. **Submitter 1003 – Melissa MacFarlane** – The submitter seeks the reinstatement of Rule 14.5.3.1.2 (C1) of the operative District Plan. Alternatively, the submitter seeks that the rule is amended so that alterations or additions to existing dwellings and other buildings, and the erection of new buildings less than 30m² and fences and walls are all identified as controlled activities, with new dwellings and accessory buildings over 30m² being RDA. The proposed exclusions would still need to apply, except where required to meet the above.
120. The key consideration here, in my view, is if development of buildings generally under 30m², whether or not it is located to the rear of the main dwelling, is appropriate as a controlled activity, with application of relevant built form standards. A key consideration with this request is the impact of either a small alteration to the front or side of principal dwelling or the erection of an entirely new building in front of the principal dwelling. An alteration or addition that complies with the built form standards could result in a positive outcome, however, the design could include an inconsistent roof pitch (i.e. a flat roof), and/or window proportions and materials that detract from the character of the primary dwelling. These types of issues will be difficult to manage through conditions of consent under a controlled activity pathway, in my view.
121. Further, a new building would undermine the ability to view the principal dwelling from the street, resulting in the site no longer being a 'primary' classification under the Character Area methodology. Both development scenarios will have varying impacts on the character values. Given this, I consider that any development visible from the street including fences and walls is better assessed as an RDA.
122. **Submitter 127 - Michael Fisher** – The submitter seeks the removal of the requirement for smaller accessory buildings to be located to the rear of the main residential unit in order for them to be permitted, as this is considered to be particularly onerous (Rule 14.5.3.1.3 RD14 (b) iii).
123. Accessory buildings that are less than 30sqm in area are a controlled activity if they are less than 5m in height and located to

the rear of the main residential unit. If they are larger in scale or located in front of the main residential dwelling, consent is required.

124. A key characteristic of many of the Character Areas is spacious front yards, with generally low fencing, lawn areas and planting. This results in a sense of spaciousness and openness in most cases and the ability to view the primary dwelling from the public realm. Development of accessory buildings in front of the dwelling has the potential to undermine these values, as is evident across a number of the Character Areas, and therefore I consider that a consent process is an appropriate response in managing the potential effects accessory building can have on the values of the different character areas.
125. **Submitter 769 - Megan Power** – The submitter seeks an increase in the permitted limit for the demolition / removal of a building from 30m² to 36m² (Rule 14.5.3.1.3 RD14 (a)), to allow removal of a standard kitset double garage without the need for consent (noting only a smaller replacement of 30m² or less would be permitted). In addition, the submitter seeks a reduction in the width of the rear boundary landscaping strip (Rule 14.5.3.2.6 a.ii.B) from 2m to 1m and the removal of the requirement for this to include trees of a minimum height of 6-8 metres, as the height requirement may cause shading.
126. The rule seeks to manage through an RDA process the demolition of larger buildings, particularly the main residential unit with the 30m² identified as a threshold. Most accessory buildings are below this size, although it is acknowledged that the size of a standard double garage (i.e., a Versatile double garage) is 36m² in area. I also note that the smallest dwellings located across the character areas are around 60m² in area. On this basis, I consider that the threshold could be increased to 36m², noting that it would be an increase in the size of the building that could be removed without consent, but would not change the limit on the size of an accessory building that is permitted (i.e. an accessory building would remain permitted only where it is less than 30m², to the rear of the main residential unit, and where less than 5 metres in height).

127. In relation to the landscape strip rule, the landscape and vegetation on individual properties generally contributes to the overall character of the areas. Dwellings in most Character Areas are set within a landscape context with planting assisting to achieve an openness across sites and a visual separation between dwellings. The rear boundary landscape requirement and associated planting of trees of a medium scale will assist to maintain this sense of separation between dwellings and enable a landscape setting to be maintained, including in views from the public realm. A reduction in the rear setback to 1m will limit the nature of mature planting possible.
128. **Submitter 127 - Michael Fisher** – The submitter seeks to retain the current 8m height limit applying in Character Areas, as the proposed lower limit (Rule 14.5.3.2.3 b. iii. and iv) makes development and alteration in the Beckenham Character Area more onerous than the current accepted height limit.
129. The height limit outlined for the Beckenham Character Area is 5.5m (along with a number of other Character Areas). The residential dwellings in the Beckenham Character Area are primarily single storey and consist of early to mid-20th century villas, bungalows, and with a limited number of Art Deco houses. The roof profiles of these dwellings are generally consistent. The height of a dwelling within the area is a key consideration in determining the impact the building will have on the surrounding character area, with height being a key attribute in achieving a cohesive character. This includes how the dwelling is viewed from the street and how successful it is in fitting into the area.
130. Additional analysis of the existing height limits within the Beckenham Character Area along with the other areas included under Rule 14.5.3.2.3 b.iv. has been undertaken. The proposed height limit for the Character Areas could be adjusted to 6.5 metres from the 5.5 metres outlined. Although there is some variation in height limits across the Areas, there is a broad consistency in the limits. In my view, a height limit of 6.5 metres would still retain a broadly consistent height across these Areas and maintain the existing character. Reverting to the existing 8m height limit because you could theoretically build to it at present is unlikely to retain the

existing character, with very few of the existing dwellings across the areas being of this height.

131. **Submitter 519 - James Carr** – The submitter requests adoption of the MDRS in relation to height and recession planes but applying stricter limits on site coverage and front setbacks. The reasons given is that there are two-to-three storey houses in some Character Areas (with the examples given being Chester Street East, Heaton Street and Macmillan Avenue) which define the character of these areas, which would almost breach the existing height limits and recession planes for these areas (but likely meet the MDRS standards), making sympathetic alterations or replacement of non-heritage buildings with housing which better fits the character very difficult. I note that one of the areas identified by the submitter, Chester Street East, is a heritage area and so is beyond my area of expertise.
132. The height limit specified for the Heaton and Cashmere Character Areas is 7m plus 2m for the roof form (in comparison to a 11m plus 1m roof under MDRS). There is no specific recession plane rule for Character Areas, with that of the underlying zone applying. The height limit generally reflects the existing heights of the dwellings within these two Character Areas, which are generally greater in scale given the Georgian and English Domestic Revival style, many of which are two storey and have steeply pitched hip and gable roof forms. The MDRS height limit would enable three storey development within these areas which would not generally be consistent with the character values of the area (noting a small number of dwellings include attic windows). It would result on average in an additional 2 metres in height in comparison with the majority of the dwellings within the two areas.
133. Additional analysis of the existing height limits for both Heaton and Cashmere has been undertaken. The proposed height limit for Heaton and Cashmere could be adjusted to 8m plus 2m for the roof pitch and still maintain a level of consistency across the two Character Area's. Beyond that limit any sympathetic alterations or replacement of non-heritage buildings which breach the height limit can be assessed on a case-by-case basis, which in my view is appropriate.

134. **Submitter 733 - Beckenham Neighbourhood Association Inc** – The submitter seeks an amendment to the minimum building width facing the street (Rule 14.5.3.2.5 b. and c.) to allow for variation where the proposed development matches its setting, as these may be larger than equivalent measurements on original character bungalows. The submitter considers that allowing some flexibility to match the site could be effective at protecting street scene with less restriction on the design of new housing.
135. Rule 14.5.3.2.5.b states that any residential unit shall be built across a minimum of 60% of the width of the lot where it abuts a road boundary. The focus of this standard is to maintain a consistent proportion of dwellings within its context. This width in conjunction with setbacks will maintain a balance of house and garden size and the overall pattern of development. A minimum width will discourage narrow dwellings which are out of keeping with the proportion of the existing dwellings. In order to maintain a similar scale and proportion of houses and ensure a level of consistency and overall coherence within an area I consider that this minimum requirement is maintained.
136. **Submitter 127 - Michael Fisher** – The submitter seeks an amendment to the front setback requirements (Rule 14.5.3.2.8 a. i) to exempt compliance where adjacent residential units are closer to the front boundary, on the basis that the 8m setback is a blunt tool and does not align with the current design guidance for the Beckenham RCA, which specifies that dwellings can line up with adjacent dwellings to keep a consistent street scene. **Submitter 733 - Beckenham Neighbourhood Association Inc** also seek to amend the building setback from street (in Rule 14.5.3.2.8 a. i.) to allow for variation where the proposed development matches its setting, for example where neighbouring original houses are setback less than 8m. The submitter notes that allowing some flexibility to match the site could be effective at protecting street scene with less restriction on the design of new housing.
137. The front setback rule is an important character attribute and is key to defining the building edge. I acknowledge that there is some variations to the existing street setbacks in Beckenham given the current combination of villas on larger lots and bungalows. Key to

achieving a consistent street scene is seeking to align development with the predominant adjacent group of houses, noting that some more recent developments may be closer to the street but this is not the predominant character and should not guide future location of dwellings. As such, I consider a setback standard to be considered the most appropriate tool to manage proximity of development from the street. I have reassessed the setbacks within the area and consider that a 7m setback would be an acceptable threshold and more enabling than the proposed 8m. Any reduction beyond this would require assessment, in my view.

138. **Submitter 127 - Michael Fisher** – The submitter seeks a reduction in the side and rear yards to 1m (Rule 14.5.3.2.8 a. ii. and iii.), as the proposed 2m and 3m side and rear setbacks for the Beckenham RCA are considered overly onerous, particularly given the RCA has been reduced, meaning that some side and rear properties are now not subject to the same setbacks and can build 1m from boundaries.
139. The proposed side yard setback rule outlines a requirement of 2m on boundary and 3m on the other. There is some variation across the Character Area, with the villas having more generous setbacks than the bungalows which sit on slightly narrower sites and in some instances include a 1m wide setback along one side boundary. After further consideration, in my view, a 3m and 1m side yard standard would be acceptable in maintaining the character values. I consider that the rear yard setback of 3m is reflective of the character area and should be retained.
140. **Submitter 127 - Michael Fisher** – The submitter seeks an increase in the building coverage (Rule 14.5.3.2.9) to 50%, as the 35% standard is considered onerous, when coupled with other built form standards in the Beckenham RCA.
141. There has been an error in the specification of the 35% limit. Appendix 3 of the Council's Technical Assessment sets out a 40% building coverage. This broadly reflects the pattern of development within the Character Area through a balance between buildings and open space, noting that there are a large a number of properties that have considerably lower built coverage of around 20%. I recommend that the coverage is set at 40% as this is sufficient to

ensure that sites continue to have a spacious feeling. Along with the height limits, building coverage manages the bulk or size of future buildings, key to maintaining the character values.

142. **Submitters 685 and 720⁶⁴ – Lyttelton Character Area** – These submitters seek amendments to the Lyttelton standards, including site density (Rule 14.8.3.2.2(a)) and site coverage (14.8.3.2.4(a)).
143. Within the Lyttelton Character Area PC14 site density requirements are one unit per 450m² (net site area). Under the operative District Plan the density is one unit per 250m². PC14 includes site coverage of 50%, with the submitters requesting this be changed to 60%, which is the current requirement under the operative District Plan.
144. The township includes variation in the size of the lots partly in response to the topography and the street and block layout, but also in relation to the range of existing dwellings present, from small workers cottages to larger villas. Many of the sites that include the characteristic workers cottages are narrow in width (around 10m) but have a deep lot with a net site area of 400-500m². Respecting this varied pattern of development is important in maintaining character values. Given a predominance of larger lots the net site area has been set at one unit per 450m² in order to conserve the character values and enable sufficient space to address sloping sites. I consider that this site density should be maintained.
145. In relation to site coverage, there is also some variability in site coverage across the township. Through the Character Area assessment work, and subsequent analysis undertaken by Council a site coverage of 60% was identified. As such, it is recommended that PC14 is amended to adopt a 60% coverage for Lyttelton.

CONCLUSIONS

146. This evidence addresses issues raised in submissions and further submissions on PC14 specific to Character Areas as a Qualifying Matter.

⁶⁴ Submitter S685.77 and .78 Canterbury / Westland Branch of Architectural Designers NZ. Submitter 720.43 and .44 Mitchell Coll.

147. In response to specific submissions and questions raised by Ms White (the planner providing planning evidence for the Council in relation to Character Areas) this evidence considers changes to the boundaries of the Character Areas as notified in PC14, evaluates new Areas and considers the impact of changes to the District Plan provisions outlined in PC14.
148. In conclusion:
- (a) Cashmere View Street meets the threshold criteria for identification as a Character Area.
 - (b) RDA status with applicable built form standards will align with maintaining and enhancing the character values of the different Areas.
 - (c) If RDA status is not retained, Controlled Activity status with a full suite of built form standards is the preference in minimising the risks associated with the potential loss of character area values.
 - (d) Changes are made to the rules set out in PC14 in relation to:
 - (i) The size of buildings that can be demolished;
 - (ii) The front yard setback in the Beckenham Character Area;
 - (iii) The building coverage in the Beckenham Character Area; and
 - (iv) The height limit in the Heaton/Cashmere Character Areas and the Englefield, Ranfurly, Francis, Malvern, Massey, Severn, Tainui, Ryan, Dudley, Beckenham, Piko and Eversham/Bewdley Character Areas.

Date: 11 August 2023

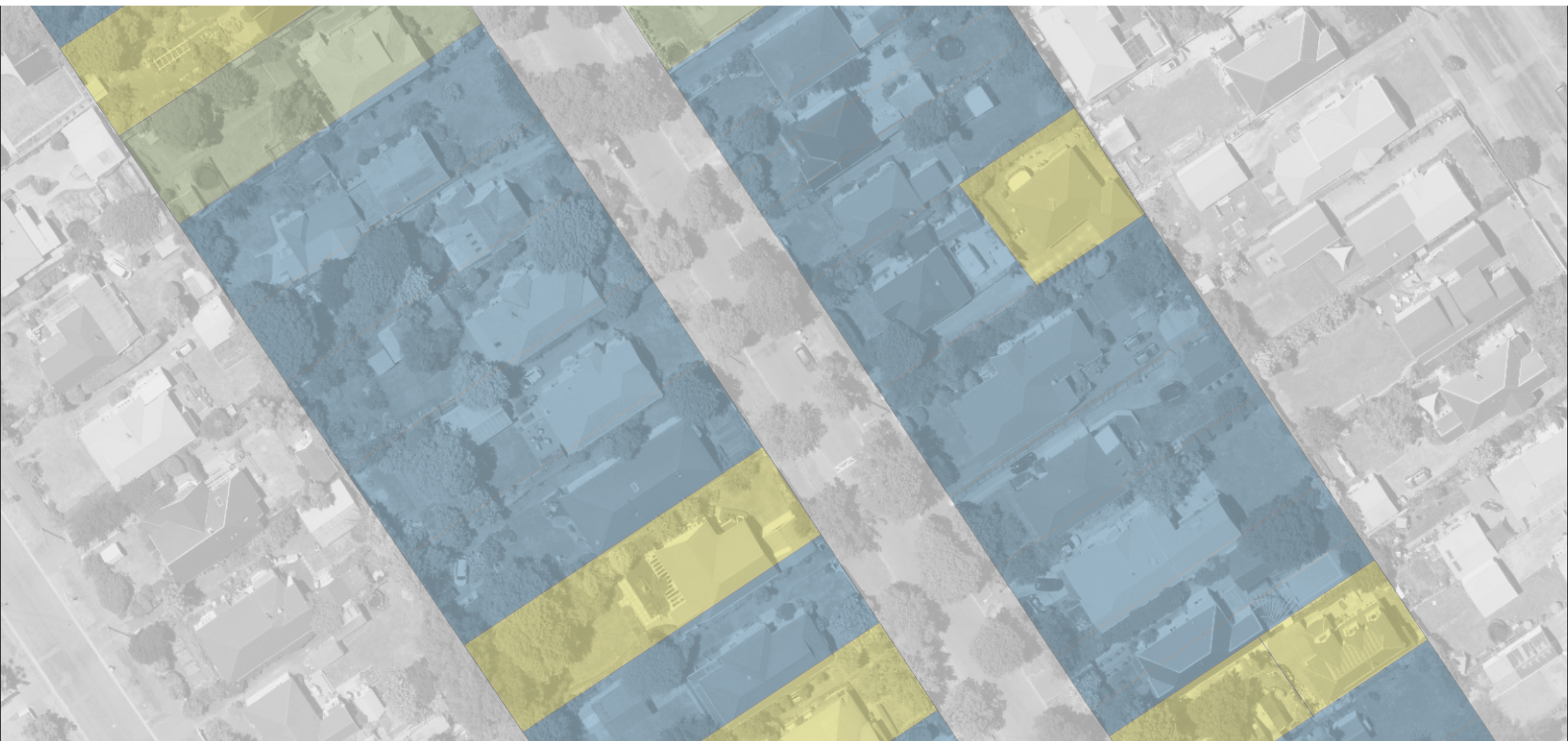
Jane Rennie

**APPENDIX A – EVALUATION REPORT – ASSESSMENT OF
ADDITIONAL CHARACTER AREAS ARISING FROM SUBMISSIONS ON
PC14**

INVESTIGATION OF CHARACTER AREA QUALIFYING MATTERS – ŌTAUTAHI CHRISTCHURCH SUBURBAN CHARACTER AREAS

APPENDIX A: EVALUATION OF ADDITIONAL CHARACTER AREAS ARISING FROM SUBMISSIONS ON PC14

11 AUGUST 2023





Boffa Miskell is proudly a
Toitū carbonzero® consultancy

DOCUMENT QUALITY ASSURANCE

BIBLIOGRAPHIC REFERENCE FOR CITATION:

Boffa Miskell, 2023. *INVESTIGATION OF CHARACTER AREA QUALIFYING MATTERS – ŌTAUTAHI CHRISTCHURCH SUBURBAN CHARACTER AREAS - APPENDIX A: EVALUATION OF ADDITIONAL CHARACTER AREAS ARISING FROM SUBMISSIONS ON PC14*

Report by Boffa Miskell Limited for Christchurch City Council.

PREPARED BY:

Olivia Opie
Urban Designer/ Landscape Architect
Boffa Miskell Ltd

REVIEWED BY:

Jane Rennie
Urban Designer / Associate Partner
Boffa Miskell Ltd

Sue McManaway
Landscape Planner
Boffa Miskell Ltd

STATUS: FINAL

Revision / version: 2

Issue date: 11 August 2023

CONTENTS

SUMMARY 4

CASHMERE VIEW, FAIRVIEW AND ROSE STREETS 5

SCOTT STREET 6

WATFORD STREET 7

BALLANTYNE AVENUE 8

SUMMARY

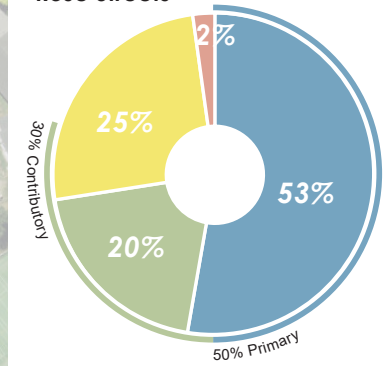
SUMMARY TABLE OF REQUESTED CHARACTER AREAS

	Preliminary Assessment	2023 Requested Character Area Assessment Ranking (%)				Recommendation
		P	C	N	I	
Helmores Lane, Desmond and Rhodes Street (to Rossall, Holmwood and Fendalton*)	Did not pass	-	-	-	-	-
Rugby Street, Merivale Lane and surrounds	Did not pass	-	-	-	-	-
Cashmere View, Fairview and Rose Streets	Passed	53%	20%	25%	2%	Cashmere View Street only to become Character Area (P 75%, C 17%, N 6% and I 3%)
Jane Dean Close	Did not pass	-	-	-	-	-
Matai Street	Did not pass	-	-	-	-	-
Scott Street	Passed	40%	26%	26%	9%	Does not meet Character Area threshold
Forfar Street	Did not pass	-	-	-	-	-
Gwynfa Avenue	Did not pass	-	-	-	-	-
Ballantyne Avenue	Passed	46%	30%	24%	0%	Does not meet Character Area threshold
Papanui to Watford Street	Passed	37%	25%	33%	4%	Does not meet Character Area threshold
Knowles, Rutland, Papanui, Dormer	Did not pass	-	-	-	-	-
Normans, Papanui, Blighs, railway line	Did not pass	-	-	-	-	-
Gloucester, Woodham, Trent, England	Did not pass	-	-	-	-	-

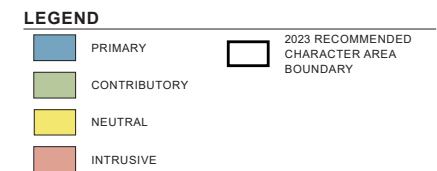
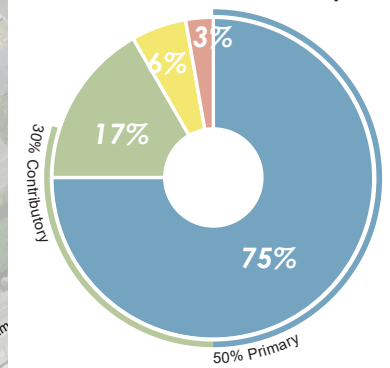
CASHMERE VIEW, FAIRVIEW AND ROSE STREETS



2023 CHARACTER ASSESSMENT
Cashmere View, Fairview and Rose Streets



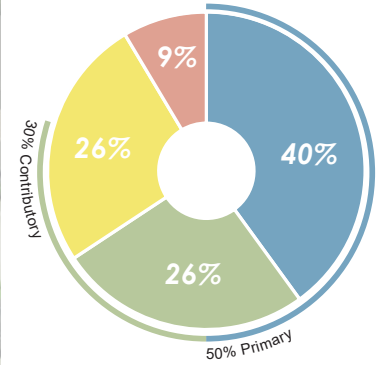
2023 CHARACTER ASSESSMENT
Cashmere View Street Only



SCOTT STREET



2023 CHARACTER ASSESSMENT



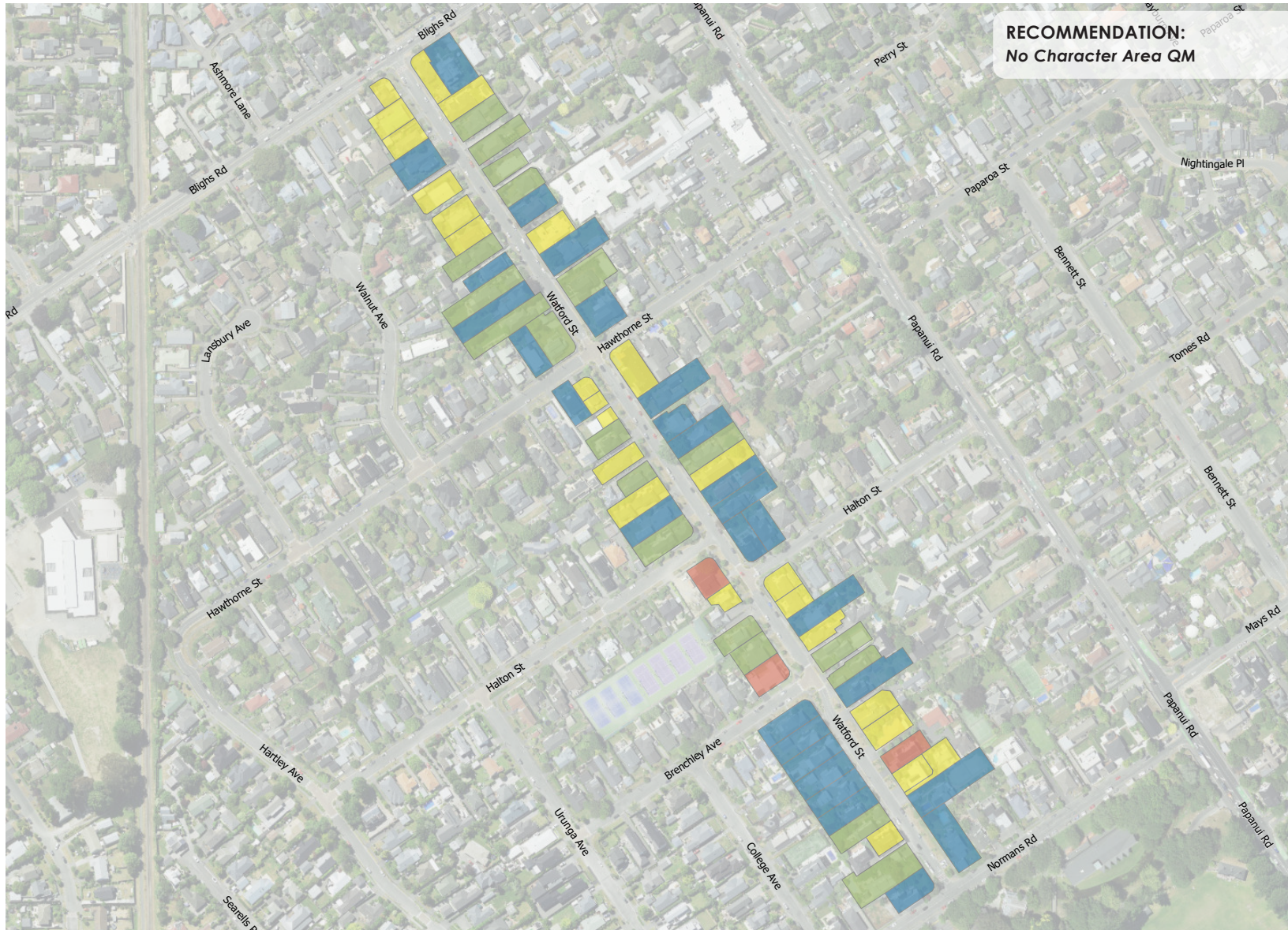
LEGEND

- PRIMARY
- CONTRIBUTORY
- NEUTRAL
- INTRUSIVE
- 2023 RECOMMENDED CHARACTER AREA BOUNDARY

Scale: NTS

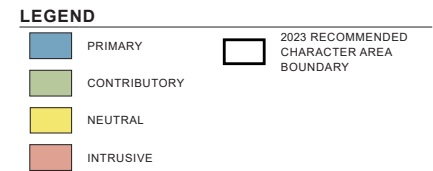
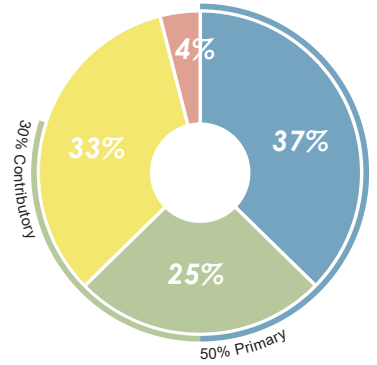


WATFORD STREET



RECOMMENDATION:
No Character Area QM

2023 CHARACTER ASSESSMENT



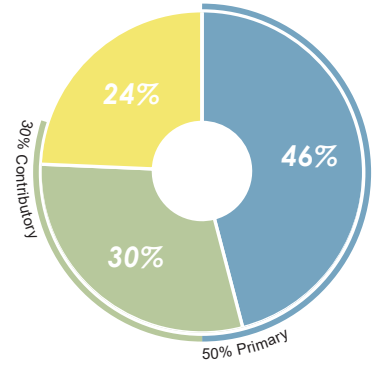
Scale: NTS

BALLANTYNE AVENUE



RECOMMENDATION:
No Character Area QM

2023 CHARACTER ASSESSMENT



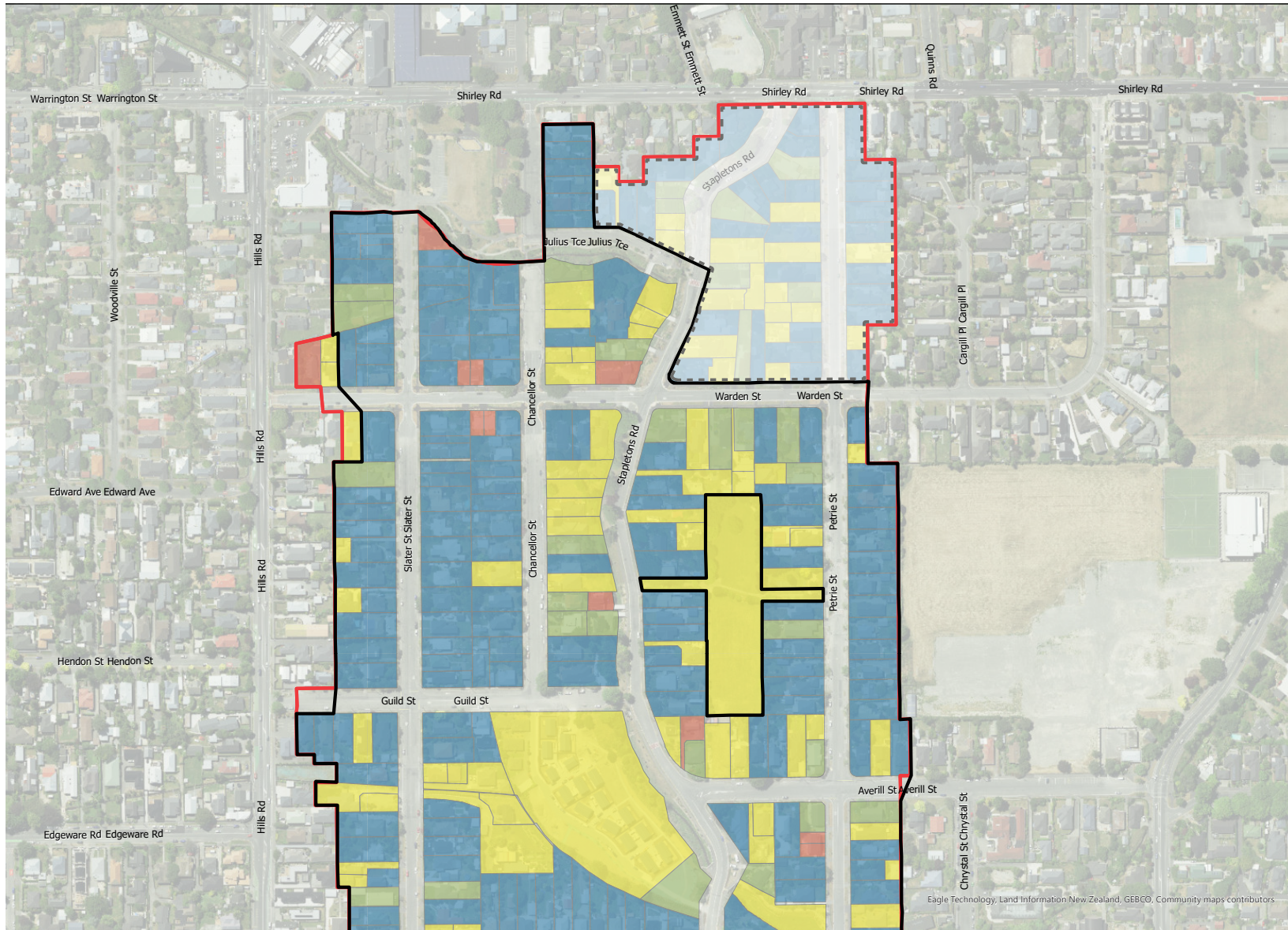
LEGEND

- PRIMARY
- CONTRIBUTORY
- NEUTRAL
- INTRUSIVE
- 2023 RECOMMENDED CHARACTER AREA BOUNDARY

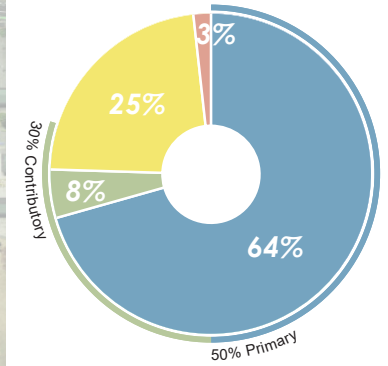
Scale: NTS



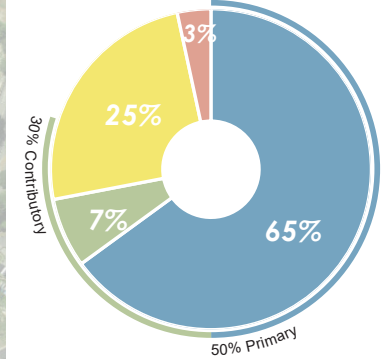
CHARACTER AREA 14 - DUDLEY*



2022 CHARACTER ASSESSMENT



2023 CHARACTER ASSESSMENT



LEGEND

- PRIMARY
- CONTRIBUTORY
- NEUTRAL
- INTRUSIVE
- DISTRICT PLAN CHARACTER AREA BOUNDARY
- 2023 RECOMMENDED CHARACTER AREA BOUNDARY
- LOTS IMPACTED BY CENTRE WALKABLE CATCHMENT

* This area does not meet the 80% requirement but does exceed the 50% Primary score. The boundary could be altered further to exclude "properties not visible from the street" to enhance the percentage scores overall and more accurately represent the Character Area.

*Petrie Park has been excluded from the revised character area boundary. Classified as neutral in 2015 assessment (as shown above).



Scale: NTS

APPENDIX B – SUMMARY TABLE OF SUBMISSIONS ADDRESSED IN EVIDENCE

NO.	SUBMITTER NAME	SUMMARY OF RELIEF SOUGHT
Neighbourhood Wide Requests		
Cashmere		
S303.3	Bron Durdin	Expand Character Areas to include other areas with established trees and gardens. (e.g. lower Cashmere, Beckenham, Hillsborough, Cracroft, Somerfield, Opawa)
Somerfield and Lower Cashmere		
S1006.1	Jane Sutherland-Norton on behalf of Andrew Norton	Somerfield and Lower Cashmere suburbs should be in a character area. Resource consent should be required before any development can proceed.
S710.3	Michelle Trusttum	Include Somerfield in Special Character Overlay.
Hornby, South Hornby, Sockburn, Hei, Islington, and Broomfield		
S1090.2	Waipuna Halswell-Hornby-Riccarton Community Board	Supports the Residential Character Areas but considers there are other examples of areas with similar character to the areas proposed that should be identified in the Plan including areas of Hornby, South Hornby, Sockburn, Hei, Islington, and Broomfield.
Previously Requested Character Areas		
S278.1 S278.2	Francine Bills	Mersey Street, which runs south of Westminster Street to Berwick Street, be incorporated in the Severn Residential Character Area including 1-54 Mersey Street, 11-19 Berwick Street, and 116-136 Westminster Street.
S755.3	Margaret Stewart	Add Woodville Street, St Albans
All SAMs from the 1995 City Plan		
S703.1	Graeme Boddy	Requests status of Eastern Terrace between the iron bridge adjacent Bowenvale Avenue and the footbridge at Malcolm Street to be changed from being 'Protected by being too far from public transport' to the fuller protection of being 'Part of the Character Area of the Beckenham Loop'.
S737.12	Christian Jordan	Add these areas to Special Character QM. Additional character areas of importance that should be included are: All of the Special Amenity Areas from the 1995 City Plan not already character areas including in particular: Fendalton SAM 8 and 8A Deans Bush SAM 7 and 7A Opawa SAM 5 St James SAM 16 (plus Windermere Road) Also the following larger areas which were not SAMs: - Knowles, Rutland, Papanui, Dormer - Normans, Papanui, Blighs, railway line - Gloucester, Woodham, Trent, England
Changes to Proposed Character Area Boundaries		
S703.1	Graeme Boddy	Requests status of Eastern Terrace between the iron bridge adjacent Bowenvale Avenue and the footbridge at Malcolm Street to be changed from being 'Protected by being too far from public transport' to the fuller protection of being 'Part of the Character Area of the Beckenham Loop'.

S769.9	Megan Power	Amend Planning Map 46: Amend the extent of the proposed Beckenham Character Area to match the operative District Plan extent and include all sites within the operative extent within the Character Area, as shown in Map 1 and Map 2 of the submission.
S228.1	Martin Winder	Retain the Character Area on Hackthorne Road but exclude the vacant property at 75a Hackthorne Road.
S499.3	Daniel Rutherford	Please remove both titles of our property at 20 Macmillan Avenue/20b Macmillan Avenue from the residential character area.
Changes to Proposed Character Area Rules - Lyttleton		
S685.77	Canterbury / Westland Branch of Architectural Designers NZ	Retain existing minimum net site area of 250m2.
S685.78	Canterbury / Westland Branch of Architectural Designers NZ	Retain existing maximum site coverage of 60%.
S720.43	Mitchell Coll	Amend subclause 14.8.3.2.2(a) back to 250m2.
S720.44	Mitchell Coll	Amend subclause 14.8.3.2.4(a) back to 60%.
S726.27	New Zealand Institute of Architects Canterbury Branch	Retain current site coverage limits.
S1003.15	Melissa Macfarlane	Reinstate Rule 14.5.3.1.2(C1) as per the Operative Plan. Alternatively, amend this rule so that alterations or additions to existing dwellings and other buildings, and the erection of new buildings less than 30m2 and fences and walls are all classified as controlled activities. New dwellings and accessory buildings over 30m2 would be RDIS.
Requested Character Areas		
Merivale		
Helmores Lane, Desmond Street and Rhodes Street (to Rossall Street)		
S62.1	Thomas Calder	Include Helmores Lane, Desmond Street and Rhodes Street (to Rossall Street) as a Residential Character Overlay Area.
S86.1	Melissa and Scott Alman	Identify Helmores Lane, Desmond Street and Rhodes Street (to Rossall Street) as a Residential Character Area.
S119.3	Tracey Stack	That Helmores Lane, Desmond Street and Rhodes Street (to Rossall Street) be identified in the Christchurch District Pan as a Medium Density Residential zone and a Residential Character Overlay Area and be made subject to the rules that apply to Residential Character areas.
S164.3	James and Adriana Baddeley	That Helmores Lane, Desmond Street and Rhodes Street (to Rossall Street) be identified as a Residential Character Overlay Area.
S165.1	Catherine & Peter Baddeley	That Helmores Lane, Desmond Street and Rhodes Street (to Rossall Street) be identified as a Residential Character Overlay Area.
S255.1 S255.4	William Bennett	That Helmores Lane, Desmond Street and Rhodes Street (to Rossall Street) be identified in the Christchurch District Plan as a Medium Density Residential zone and a Residential Character Overlay Area and be made subject to the rules that apply to Residential Character areas.
S376.1	Colin Gregg	That Helmores Lane, Desmond Street and Rhodes Street (to Rossall Street) be identified as a Residential Character Overlay Area.

S381.2	Kate Gregg	Seeks that Helmores Lane, Desmond Street and Rhodes Street (to Rossall Street) be identified in the Christchurch District Plan as a Medium Density Residential zone and a Residential Character Overlay Area and be made subject to the rules that apply to Residential Character areas.
S502.2	Kyri Kotzikas	Seeks that Helmores Lane, Desmond Street and Rhodes Street (to Rossall Street) be identified as a Medium Density Residential zone and a Residential Character Overlay Area and be made subject to the rules that apply to Residential Character areas.
S530.1	Chris Wilson	Seeks that the area identified as Helmores Lane, Desmond Street and Rhodes Street (to Rossall Street) to be identified as Residential Character area, as it was under the operative plan.
S664.4	Catherine & Peter Morrison	Seeks residential special character overlay in Desmond Street and the close surrounding streets of Helmores Lane and Rhodes Street up to Rossall Street.
S665.1	Lawrence & Denise May	That Helmores Lane, Desmond Street and Rhodes Street (to Rossall Street) be identified in the Christchurch District Pan as a Medium Density Residential zone and a Residential Character Overlay Area and be made subject to the rules that apply to Residential Character areas.
S698.1	Ann-Mary & Andrew Benton	That Helmores Lane, Desmond Street and Rhodes Street (to Rossall Street) be identified in the Christchurch District Pan as a Medium Density Residential zone and a Residential Character Overlay Area and be made subject to the rules that apply to Residential Character areas.
S584.3	Claudia M Staudt	New QM Residential Character Area (as per previous SAM 8) for the area bounded by, Holmwood Road, Rossall Street, Hagley Park and Fendalton Road (Planning Map 31 and CC).
Rugby Street, Merivale Lane, and surrounds		
S316.1	Jo Jeffery	Protect Merivale streets from any [multi-storey] development permanently and apply a heritage ruling on these streets.
Somerfield		
Ashgrove Terrace, Fairview Street and Cashmere View Street (and Rose Street)		
S15.6	Martin Jones	Introduce a new Residential Character Area over Cashmere View Street.
S18.3	Rex Drummond	Fairview Street (Cashmere) should be within a Residential Character Area.
S19.3	Patricia Dench	Fairview Street should be within a Residential Character Area
S20.3	Les Drury	1/19 Fairview Street should be within a Residential Character Area.
S25.2	Christine Parkes	That the area of Cashmere View St, Fairview St and nearby Ashgrove Tce be included in a residential character area.
S27.2	Steve Parkes	That the area of Cashmere View St be identified as a suburban [residential] character area.
S92.1	Andrew Laurie	The area near and including Ashgrove Tce, Fairview Street and Cashmere View Street should be a Heritage Value Residential Character zone , and a resource consent should be required before any development can proceed.
S101.2	Ros Pheloung	Cashmere View Street and surrounding streets should be within a Character Area.
S124.1	Deborah Brown	That 15 Cashmere View Street is included as a suburban character area.
S125.1	Simon Brown	That 15 Cashmere View Street is included as a suburban character area.
S126.1	Chris Wells	That Cashmere View Street is included as a suburban character area.

S162.2	Jill Edwards	That the area surrounding and including Rose Street should require a resource consent for development and that the area be zoned as a suburban character area.
S179.2	Sean Walsh	Request that Cashmere View Street (including #13 Cashmere View Street) Somerfield be a suburban charter area/street. Request that resource consent be required before any development can proceed.
S227.1	Alex Prince	Amend Lower Cashmere (Fairview Street/Cashmere View/Ashgrove Terrace) to be in a residential character area.
S581.1	Joanne Nikolaou	Seeks that council agrees the Cashmere View Somerfield Area [be] designated a Suburban Character Area.
S583.2	Jaimita de Jongh	That Fairview and Cashmere View Streets be included in a character area.
S1054.1	Joanne Nikolaou	Seek that a new Character Area be included for Cashmere Somerfield.
Riccarton		
Jane Dean Close		
S182.2	Roseanne Hawarden	That Jane Deans Close be included as a Residential Heritage Area.
S188.13	Riccarton Bush - Kilmarnock Residents' Association	Jane Deans Close should [have intensification restricted through a Qualifying Matter].
Matai Street		
S188.16	Riccarton Bush - Kilmarnock Residents' Association	Both sides of Matai St West from Straven Rd east to the railway line, including the area north to the Avon River, should be a Qualifying Matter restricting further residential intensification.
Sub. No.	Submitter name	Summary of relief sought [copy from the summary of submissions table]
Sydenham		
Scott Street		
S241.1	Susanne Schade	Seeks council to apply the Qualifying Matter Residential Character Area to Scott Street in Sydenham.
1088.2	Anton Casutt	Seeks that Scott Street, Sydenham is added to a Residential Heritage Area or Character Area.
St Albans		
Forfar Street		
S247.1	Jean-Michel Gelin	Create a character area including Forfar Street to limit the possible height of the new building and the sunlight access for the 1 Storey houses of the street.
Cashmere		
Gwynfa Avenue		
S726.1	Michele McKnight	Seeks the council to make Gwynfa Ave and any other similar streets on this hill ... a special character overlay area.
Upper Riccarton		
Ballantyne Avenue		
PC13* S683	Dot Fahey	Ballantyne Avenue is one of the few areas of significant environmental character and should be protected for the use of future generations.

Papanui/ Strowan		
Papanui Road to Watford Street		
S868.2	Maureen Kerr	Protect and maintain special character and quality of existing homes in area from Papanui Road to Watford Street.
Knowles, Rutland, Papanui, Dormer		
S737.12	Christian Jordan	Add these areas to Special Character QM. Additional character areas of importance that should be included are: All of the Special Amenity Areas from the 1995 City Plan not already character areas including in particular: Fendalton SAM 8 and 8A Deans Bush SAM 7 and & A Opawa SAM 5 St James SAM 16 (plus Windermere Rd) Also the following larger areas which were not SAMs: - Knowles, Rutland, Papanui, Dormer - Normans, Papanui, Blighs, railway line - Gloucester, Woodham, Trent, England
S737.12	Christian Jordan	Add these areas to Special Character QM. Additional character areas of importance that should be included are: All of the Special Amenity Areas from the 1995 City Plan not already character areas including in particular: Fendalton SAM 8 and 8A Deans Bush SAM 7 and & A Opawa SAM 5 St James SAM 16 (plus Windermere Rd) Also the following larger areas which were not SAMs: - Knowles, Rutland, Papanui, Dormer - Normans, Papanui, Blighs, railway line - Gloucester, Woodham, Trent, England
Linwood		
Gloucester, Woodham, Trent and England		
S737.12	Christian Jordan	Add these areas to Special Character QM. Additional character areas of importance that should be included are: All of the Special Amenity Areas from the 1995 City Plan not already character areas including in particular: Fendalton SAM 8 and 8A Deans Bush SAM 7 and & A Opawa SAM 5 St James SAM 16 (plus Windermere Rd) Also the following larger areas which were not SAMs: - Knowles, Rutland, Papanui, Dormer - Normans, Papanui, Blighs, railway line - Gloucester, Woodham, Trent, England