

## 1. RESPONSE BY CLARE PIPER FOR IHP DATED 22 NOVEMBER 2023 – SPECIFIC PURPOSE ZONES

1.1 As per requested by the IHP on 21<sup>st</sup> November 2023, the following provides further information on matters raised by the Panel in relation to the Specific Purpose Zones, namely:

(a) Specific Purpose (School) Zone (**SPSZ**):

- (i) Removal of ‘amenity’ within objectives, policies and matters of discretion – impact on plan administration in regard to assessment of effects.
- (ii) School designations and the role of the underlying zone.
- (iii) Continuous building length provision – application in relation to height enablement.
- (iv) Westmount School

(b) Specific Purpose (Hospital) Zone (**SPHZ**):

- (i) For the Former Christchurch Women’s Hospital site, provide a table with information on the operative, notified and s.42A provisions in relation to zone, alternative zone, site coverage and height.

## 2. SPSZ – AMENITY

2.1 Within the notified SPSZ provisions<sup>1</sup> removal of the wording ‘amenity’ and or ‘amenity values’ was proposed within:

- (a) Introduction 13.6.1 d.
- (b) Objective 13.6.2.1 a. iii
- (c) Policy 13.6.2.1.2
- (d) Matters of discretion 13.6.5.1 a.

2.2 This was addressed within the s32 report<sup>2</sup> within sections 5.2 Schools, and 5.5 Hospitals.

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<sup>1</sup> [Plan-Change-14-HBC-NOTIFICATION-Sub-chapter-13.6-School.pdf \(ccc.govt.nz\)](#)

<sup>2</sup> [Plan-Change-14-HBC-NOTIFICATION-Section-32-Revised-provisions-for-SP-Schools-and-Hospitals2.pdf \(ccc.govt.nz\)](#)

- 2.3 The intention behind the notified changes was to de-emphasise the consideration of amenity values, which was considered to be in line with Policy 6 of the NPS-UD.
- 2.4 Following the discussion with the IHP yesterday, I have reflected on those proposed changes. I consider that how those objectives, policies and assessment matters are proposed to be amended would inadvertently allow processing planners to consider a wider range of environmental effects those activities (i.e. educational and health care facilities) may have on the adjoining residential sites, and the surrounding neighbourhood and environment. The changes would also impact all schools and hospitals not within the scope of PC14. Given the structure of the operative district plan provisions for schools and hospitals, the alternative of creating new objectives and policies to cover the scope of the changes of PC14 to support the removal of 'amenity' and only refer to 'effects' I consider is not an efficient nor an effective approach at this stage.
- 2.5 As such, considering this, I would now **recommend to the panel that these proposed changes concerning removal of 'amenity' should not be included in the final provisions, and the status quo remains** – as per the current wording in the operative district plan.

### **3. SPSZ – DESIGNATIONS**

- 3.1 State and state-integrated schools, as per listed in Appendices 13.6.6.1 and 13.6.6.2 are designated sites by the Minister of Education<sup>3</sup>. There are currently 219 sites listed in the operative district plan – 7 have been uplifted.
- 3.2 Designated sites generally have an underlying zone of SPSZ, which then also has an alternative zone as per the SPSZ appendices. As such, these sites are able to use their designation for development via the Outline Plan or Outline Plan Wavier process, or alternatively can use the underlying zone, such as the SPSZ provisions, if the requiring authority so chooses.

### **4. SPSZ – CONTINUOUS BUILDING LENGTH**

- 4.1 Building length provisions in the operative district plan provide for all school sites to have a building that is less than 4.5m in height to be located 3m from the boundary with another zone, as long as the building does not exceed 15 metres in length or a recess is provided for every additional 15

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<sup>3</sup> [DistrictPlan \(ccc.govt.nz\)](http://www.districtplan.govt.nz) – Chapter 10, L Minister of Education

metres of building length or part thereof, with a minimum dimension of 3 metres by 3 metres for the full height of the building including the roof<sup>4</sup>.

- 4.2 The proposed changes to 13.6.4.2.4 retain this provision, with it to be applied to Residential Suburban, Residential Suburban Density Transition, Medium Density Residential, Residential Banks Peninsula, Residential Small Settlement, or Rural Zones.
- 4.3 Different standards are now proposed to apply to High Density Residential, Central City, Central City Mixed Use and Future Use Zones. The standards provide for these schools sites to have buildings less than 5m in height to be located 4m from the boundary with another zone. The proposed continuous building length provision that applies to these sites provides for a similar requirement to the other school sites (as per above), albeit as long as the building length does not exceed 30 metres in length within 15m of an internal boundary, or a recess is provided for every additional 30 m of building length or part thereof, with a minimum dimension of 4 metres in length, and 2 metres deep, for the full height of the building including the roof.

## **5. WESTMOUNT SCHOOL**

- 5.1 Westmount school, as per listed in Appendix 13.6.6.3 Private Schools, has an alternative zone of Rural Urban Fringe (RuUF), which is not within the scope of PC14. Those provisions relating to schools within rural zones are to remain untouched.
- 5.2 If a SPSZ site is not used for educational purposes, the alternative zone can be used for future development purposes. I am aware of two SPSZ sites that have been developed in accordance with their alternative zone and are now being used for residential purposes<sup>5</sup>.
- 5.3 There are many SPSZ sites in Christchurch listed in the appendices that have either been closed and/or amalgamated with new school names, including designated sites. Some of these have been updated, however some have not. This matter was brought to the attention of the Ministry of Education for future consideration.

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<sup>4</sup> 13.6.4.2.4 a. ii.

<sup>5</sup> Freeville Primary and Central New Brighton Primary

## 6. FORMER CHRISTCHURCH WOMENS HOSPITAL SITE

6.1 The former Christchurch Women’s Hospital site is currently zoned Specific Purposes (Hospital), with an alternative zone of Residential Central City (RCC) and is not a designated site by the Minister of Health. For clarity it is proposed that the SPHZ is retained for this site and that the alternative zone is changed to HRZ.

	Operative District Plan	s.32 Notified	s.42A
SPH Zoning	SP(Hospital) – separate provisions (13.5.4.2.5)	SP (Hospital) – incorporated within ‘Smaller inner urban sites’ provisions (13.5.4.2.4)	As per notified, albeit removal of ‘(outside of Residential Precinct)’ within provisions (13.5.4.2.4. b)
Alternative Zone	RCC	HRZ (outside of Residential Precinct)  <i>Change in zone naming – commensurate to surrounding residential changes.</i>	HRZ (outside the central city) – noting change in HRZ is on southern boundary (HRZ 22m >39m)  <i>No change – commensurate to surrounding residential changes.</i>
Site coverage in the SPHZ	N/A*  <i>*Prior to the Central City Recovery Plan, the 2005 City Plan used a 1.3 plot ratio for site density.</i>	60%  <i>Site coverage change from operative.</i>	60%  <i>No change to notified. (submission from VNA in support of site coverage).</i>
Height in the SPHZ	The maximum <u>height</u> of any <u>building</u> (including plant and lift shafts) shall be 14 metres, except for 38 and 40 Gracefield Avenue, where the maximum <u>building height</u> shall be 11 metres.	The maximum height of any building (including allowance for plant and lifts shafts) shall be 14metres at 10metres from either a road boundary or an internal boundary.  <i>No change to operative permitted height, however RD pathway for max 32m at 10m from boundary.</i>	The maximum height of any building (including allowance for plant and lifts shafts) shall be 22metres at 10metres from either a road boundary or an internal boundary.  <i>Increase in permitted height (14m&gt; 22m), with RD pathway proposed in notified now removed. Existing RD2 for heights over 22m to apply</i>

6.2 As noted in the above table, this site had a plot ratio requirement of 1.3, prior to this being removed by the Central City Recovery Plan. As such, I consider the use of site coverage for this site is not a new concept to assist in managing effects of built form on the surrounding community.

- 6.3 Whilst this may appear more restrictive than the current operative plan, I consider it is an appropriate planning response for this significant central city site given the increase in permitted height adjacent to the residential zone, which is not addressed by a QM or other provision. This was also supported by the Victoria Neighbourhood Association.
- 6.4 As per the s.42A report, it is the combination of the proposed provisions – existing and new – that I consider supports the site to be redeveloped for healthcare purposes in a way that is appropriate for that location.

Date: 22<sup>nd</sup> November 2023

Clare Joan Piper