

Before an Independent Hearings Panel  
Appointed by Christchurch City Council

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*under:* the Resource Management Act 1991

*in the matter of:* proposed Plan Change 14 to the Christchurch District  
Plan

*and:* **NHL Properties Limited**  
(Submitter 706)

*and:* **Wigram Lodge (2001) Limited, Elizabeth Harris  
and John Harris**  
(Submitter 817)

Statement of evidence of Dave Compton-Moen (landscape and  
urban design) on behalf of NHL Properties Limited, Wigram Lodge  
(2001) Limited, Elizabeth Harris and John Harris

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Dated: 20 September 2023

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**STATEMENT OF EVIDENCE OF DAVE COMPTON-MOEN ON BEHALF  
OF ON BEHALF OF NHL PROPERTIES LIMITED, WIGRAM LODGE  
(2001) LIMITED, ELIZABETH HARRIS AND JOHN HARRIS**

**INTRODUCTION**

- 1 My full name is David John Compton-Moen.
- 2 I am a Director at DCM Urban Design Limited, which is a private independent consultancy that provides Landscape and Urban Design services related advice to local authorities and private clients, established in 2016.
- 3 I hold the qualifications of a Master of Urban Design (Hons) from the University of Auckland, a Bachelor of Landscape Architecture (Hons) and a Bachelor of Resource Studies (Planning and Economics), both obtained from Lincoln University. I am a Registered Landscape Architect of the New Zealand Institute of Landscape Architects (NZILA), since 2001, a Full member of the New Zealand Planning Institute, since 2007, and a member of the Urban Design Forum since 2012.
- 4 I have worked in the landscape assessment and design, urban design, and planning fields for approximately 25 years, here in New Zealand and in Hong Kong. During this time, I have worked for both local authorities and private consultancies, providing expert evidence for urban design, landscape and visual impact assessments on a wide range of major infrastructure and development proposals, including the following relevant projects:
  - 4.1 2021 – Working for Waimakariri District Council, I prepared Urban Design evidence to assist with Private Plan Change 30 – Ravenswood Key Activity Centre which sought to rezone parts of an existing Outline Development Plan to increase the amount of Business 1 land and remove a portion of Residential 6A land;
  - 4.2 2020-21 – Working for Mike Greer Homes, I have worked on the master planning, urban design and landscape design for the following Medium Density Residential and Mixed-Use Developments;
  - 4.3 Madras Square – a mixed use development on the previously known 'Breathe' site (90+ homes);
  - 4.4 476 Madras Street – a 98-unit residential development on the old Orion Site;
  - 4.5 258 Armagh Street – a 33-unit residential development in the inner city;

- 4.6 33 Harewood Road – a 31-unit development adjacent to St James Park in Papanui;
- 4.7 2020-21 – Working with Waimakariri District Council, I have assisted with the development of four structure plans for future urban growth in Rangiora and Kaiapoi;
- 4.8 2020-21 – Working for several different consortiums, I have provided urban design and landscape advice for the following recent private plan changes in the Selwyn District:
- (a) Wilfield, West Melton (PC59 and PC67);
  - (b) Lincoln South, Lincoln (PC69);
  - (c) Trents Road, Prebbleton (PC68);
  - (d) Birchs Village, Prebbleton (PC79);
  - (e) Extension to Falcons Landing, Rolleston (PC75); and
  - (f) Rolleston Southeast (PC78).
- 4.9 Acland Park Subdivision, Rolleston – master planning and landscape design for a 1,000-lot development in Rolleston (2017-current). I am currently working with the owner to establish a new neighbourhood centre in the development. The HAASHA development was originally 888 households before we redesigned the development to increase its density to ~14.5hh/ha;
- 4.10 Graphic material for the Selwyn Area Maps (2016);
- 4.11 Stage 3 Proposed District Plan Design Guides – Residential (High, Medium and Lower Density and Business Mixed Use Zones) for Queenstown Lakes District Council (2018-2020); and
- 4.12 Hutt City Council – providing urban design evidence for Plan Change 43. The Plan Change proposed two new zones including a Suburban Mixed-use and Medium Density Residential as well as providing the ability for Comprehensive Residential Developments on lots larger than 2,000m<sup>2</sup> (2017-2019). The Medium Density Design Guide was a New Zealand Planning Institute Award winner in 2020.

#### **CODE OF CONDUCT**

- 5 Although this is not an Environment Court hearing, in preparing my evidence I have reviewed the Code of Conduct for Expert Witnesses contained in Part 9 of the Environment Court Practice Note 2023. I have complied with it in preparing my evidence. I confirm that the

issues addressed in this statement of evidence are within my area of expertise, except where I state that I am relying on the opinion or evidence of other witnesses. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

### **SCOPE OF EVIDENCE**

6 I have been engaged to provide planning evidence by NHL Properties Limited (**NHL**) and Wigram Lodge (2001) Limited, Elizabeth Harris and John Harris (**Wigram Lodge**) (collectively, the **Submitters**). This evidence relates to their submission which seeks to rezone:

6.1 132-136 Peterborough Street and 137-151 Kilmore Street, Christchurch Central, Christchurch (**NHL Site**) from notified **HRZ** to Central City Mixed Use Zone (**CCMU**), and

6.2 152-158 Peterborough Street and 237-333 Manchester Street Christchurch (**Wigram Lodge Site**) from notified **HRZ** to Central City Mixed Use Zone (**CCMU**).

7 These submission points are addressed in the same statement of evidence as the land is contiguous. Collectively I refer to the NHL Site and the Wigram Lodge Site as the **Site**.

8 In preparing my evidence, I have reviewed:

8.1 The updated Provisions for the Central City Mixed-Use zone and the High Density Residential zone.

### **SUMMARY OF EVIDENCE**

9 The receiving environment is a mix of commercial and residential development with the site being vacant. Objectives 3.3.7 (Well-functioning Urban Environment) and 3.3.8 (Urban Growth, Form and Design) are both achieved with the proposed rezoning, supporting the pre-eminence of the central city by allowing greater development potential without creating adverse effects on amenity.

10 In urban form terms, the 32m height limit on the Central City mixed use zone is lower than the 39m height control limit in the High Density Residential zone with any change between the two built forms being largely Indiscernible or Very Low. The block bounded by Peterborough, Manchester, Kilmore and Colombo is on the southern and western side of existing residential development which is considered positive although the existing road corridors provide a suitable buffer between zone types.

- 11 A Central City mixed-use zone allows for greater flexibility of use, recognising the site's location on the edge of the central city where there is often a large amount of 'mixing' occurring, without creating a reduction in amenity.
- 12 Both zone types, being High density residential and Mixed use, typically result in a positive relationship to the street and a moderate to high level of street activation whether it is numerous front doors in the case of high density residential or retail/office frontage with a minimum 20% glazing requirement (also required for Residential activities).
- 13 Noting the similarities of the two zones from a built form perspective, removing a mid-block zone change removes any potential interface issues and removes the need for mid-block setbacks or internal boundary recession planes. The recession plane starts at 3m from above the boundary and reduces development potential, noting that both sites are owned by the same.
- 14 Peterborough Street provides a suitable buffer/distance between the CCMUZ and HDZ zones with no adverse effects on amenity anticipated.

#### **RECEIVING ENVIRONMENT**

- 15 The built form of the Commercial Central City Mixed Use zone to the south and west is a mix of 1-4 storey buildings fronting Kilmore and Colombo Streets. Carparking are positioned to the rear of these buildings and covers the majority of the proposal site.
- 16 Across both Peterborough and Manchester Streets, in the High Density Residential zone, are a mix of 2-3 storey residential townhouse developments of varying ages and styles with associated surface carparking behind dwellings. All of the residential activities in the receiving environment are separated from the 'site' by major roads and do not share any boundaries. The commercial buildings to the south of the site on Kilmore have a mix of surface carparking behind the building or fronting the street. The buildings are typically 3 storey modern commercial buildings with large floorplates. The buildings end to provide a strong built edge to Kilmore Street which is positive although there are some gaps.
- 17 The urban character of the area is a mix of commercial and higher density residential supported by a moderate level of transport infrastructure. I do not consider the site could be considered to have a purely residential character given the lack of development on the site.
- 18 Overall, the receiving environment lacks a high level of visual coherence or continuity but this is starting to change as the 'gaps' are built on. The receiving environment's urban character is

considered to be mixed with commercial, mixed-use and residential activities all present.

### **BUILT FORM COMPARISON**

- 19 Having reviewed the built form standards for the Central City Mixed Use Zone (with the 32m height limit control) and for the High-density Residential zone, both zones allow for similar levels of built form.
- 20 The HDR zone allows for buildings up to 32m in height while the CCZ also allows for buildings up to this height. There are controls in both zones for residential development which could result in a similar form of development being created on the site. There are controls regarding glazing facing the street. Building setbacks, placement of carparking and landscape controls are similar. However the CCMUZ zone allows for greater flexibility of activity or use, and is more consistent with the character of the receiving environment.

### **LOSS OF DEVELOPMENT POTENTIAL**

- 21 The rezoning of the site so the entire block is CCMUZ also removes the need for a 3m setback from the internal residential boundary and the need for a recession plane requirement on the boundary between the commercial and residential zones. Appendix 14.16.2 diagram D requires a recession plane of 60degrees starting at 3.0m above the zone boundary. This results in the recession plane angle hitting a building on the CCMUZ at only 8.2m or just over 2 storeys. A third storey would be affected by the recession plane and as a result, the mid-block zone change would limit the development potential of the site.

### **TRANSITION FROM COMMERCIAL TO RESIDENTIAL**

- 22 As mentioned above, I consider that the receiving environment has a mix of commercial, mixed-use and residential developments. This is similar to most neighbourhoods on the edge of a central city which change and adapt as a city grows. It is these parts of the city which become the most diverse, both in terms of activities but also in terms of built form. Similar areas include Eden Terrace in Auckland and Mt Victoria in Wellington.
- 23 I consider that there is a noticeable difference in landuse north of Peterborough Street with the blocks becoming purely residential. To the east of the site, running in the block between Kilmore Street and Peterborough, the character also becomes more residential although there are two small pockets of CCMU. In this location Peterborough Street appears to be the ideal location for the change in zoning to occur as it removes any interface-internal boundary issues.

## **CONCLUSION**

- 24 I consider that the rezoning of the properties at 132-136, 152-158 Peterborough Street, 237-333 Manchester Street and 137-151 Kilmore Street to CCMU a more appropriate zoning which will allow greater development flexibility and remove internal boundary interfaces / sunlight outlook concerns without creating any adverse effects on residential dwellings across either Peterborough or Manchester Streets.

**Dave Compton-Moen**

**20 September 2023**