

Before an Independent Hearings Panel  
Appointed by Christchurch City Council

---

*under:* the Resource Management Act 1991

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

*and:* **Carter Group Limited**  
(Submitter 824)

Statement of evidence of Dave Compton-Moen (landscape and  
urban design) on behalf of Carter Group Limited

---

Dated: 20 September 2023

---

Reference: Jo Appleyard (jo.appleyard@chapmantripp.com)  
Annabel Hawkins (Annabel.hawkinsr@chapmantripp.com)

chapmantripp.com  
T +64 3 353 4130  
F +64 4 472 7111

PO Box 2510  
Christchurch 8140  
New Zealand

Auckland  
Wellington  
Christchurch



## **STATEMENT OF EVIDENCE OF DAVE COMPTON-MOEN ON BEHALF OF CARTER GROUP LIMITED**

### **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 worked on the master planning, urban design and landscape design for the following Medium Density Residential and Mixed-Use Developments;
    - (a) Madras Square – a mixed use development on the previously known 'Breathe' site (90+ homes);
    - (b) 476 Madras Street – a 98-unit residential development on the old Orion Site;
    - (c) 258 Armagh Street – a 33-unit residential development in the inner city; and
    - (d) 33 Harewood Road – a 31-unit development adjacent to St James Park in Papanui.

- 4.3 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;
- 4.4 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).
- 4.5 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;
- 4.6 Graphic material for the Selwyn Area Maps (2016);
- 4.7 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
- 4.8 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 My evidence will address:
  - 6.1 Site specific heritage matters;
  - 6.2 Cathedral Square height limit; and
  - 6.3 Residential and Commercial Zone chapter provisions.
- 7 In preparing my evidence, I have reviewed:
  - 7.1 The submissions filed by Carter Group Limited;
  - 7.2 The relevant Section 42A Reports prepared by:
    - (a) 02 - Andrew Willis;
    - (b) 03 – Holly Gardiner;
    - (c) 25 – David Hattam;
    - (d) 48. Alistair Ray; and
    - (e) 58. Nicola Williams.
  - 7.3 Section 32A Report - Part 2 - Qualifying Matters (District Plan Chapters 6, 8, 9, 13, 14, 18) (Part 3):
    - (a) Appendix 29 - Lower Height Limits – Victoria Street, and Cathedral Square - Christchurch City Council; and
    - (b) Appendix 32 - Arts Centre and New Regent Street Modelling and Sun Studies - Christchurch City Council.

### **SITE SPECIFIC HERITAGE MATTERS**

- 8 The following sites are affected by Site Specific Heritage Matters which I consider adversely affect the ability for the sites to achieve Objectives 3.3.7 (Well-functioning Urban Environments) and 3.3.8 (Urban Growth, Form and Design). All of the sites play a significant role in the continued development of the central city as the pre-eminent centre for commercial, civic and residential development.  
  
**32 Armagh Street**
- 9 I have reviewed the proposed provisions which have an effect on the development of this site for High-density residential development, including:

- 9.1 Reduced height control;
  - 9.2 Heritage items and settings; and
  - 9.3 Protected trees.
- 10 The height control limit for this site is 11m. This has reduced from 14m under the current District Plan. At the same time, PC14 has recommended that the height control limit for the majority of Cranmer Square be 32m. I consider that this site is part of the Cranmer Square 'catchment' and should have an increased height consistent with the rest of the Cranmer Square block. The built form of the block bounded by Gloucester, Montreal, Armagh and Rolleston Ave is similar to the block bounded by Armagh, Cranmer Square, Kilmore, and Park Ave with one, two and three storey residential dwellings. Both blocks contain educational buildings (Christ's College and Cathedral Grammar respectively) and there are considerable similarities between the blocks except that a 32m height limit is proposed for one block and an 11m height limit proposed for the other. I support the application of a 32m height limit for both blocks to create a strong built edge to Cranmer Square and allow a greater number of residents to enjoy the amenity provided by the urban open space.
- 11 A 32m height control limit has also been applied to the block at the northern end of Cranmer Square where Cranmer Terraces is currently being completed. It is unlikely this height increase will be realised.
- 12 The block bounded by Worcester, Montreal, Gloucester, and Park Ave also has a 11m height control overlay but also houses Gloucester Tower, a 35m high 10 storey residential building. The building is larger than the rest of the houses on the block but does not look out of character. Apartment buildings are relatively common through this part of the central city, albeit at a lower level of 4 or 5 storeys, but still taller than the proposed height control limits. I consider this part of the city is ideal for residential intensification as it is close to amenities (parks, museums, shops, hospital) and do not consider that the lowered height control limits reflect either the existing built environment or what should be anticipated in this location. I also consider that taller buildings and intensive developments can successfully coexist with heritage buildings on the same site or within the same block/area. There is no need to adversely hinder the intensification of a site when the heritage values of a building will be unaffected.
- 13 The photo in **Figure 1** below shows the current view of the cottage and Otari House on the southern side of Gloucester Street. While the Otari villa has a high level of amenity, its boundary fence and boundary planting prevent the villa having a positive relationship with the street environment. Gloucester St is a 20m street corridor which provides a significant break between the heritage houses

fronting the western side of Montreal and 32 Armagh Street. When analysing on the built form of the Gloucester-Montreal intersection there is no consistent form, setback or character. Building height, setback, age, use and design all vary greatly in this block with no coherence or underlying characteristics which would tie the block together. As outlined above, and highlighted by Gloucester Tower it is possible for taller buildings to be built in this area without creating adverse effects.



*Figure 1 - Montreal-Gloucester St Intersection*

- 14 On the site itself, the blue cottage building is in severe disrepair and does not add any value to either the built form or amenity of the immediate area. It does however prevent a sizeable part of the lot being developed to its full potential. In 2021, our office prepared a master plan for the site (**Figure 2** below) which would deliver a mix of 2 and 3-bedroom townhouses with a total yield of 54 townhouses. The heritage overlay area reduced this yield by 8 dwellings and when combined with the area removed for the two protected trees, the yield reduced by a further 6 houses.



Figure 2 - Bulk and location plan prepared for 32 Armagh Street

### New Regent Heritage Area Interface (129-143 Armagh Street)

- 15 I understand the city block north of New Regent Street (bounded by Armagh, Manchester and Colombo Streets and Oxford Terrace) has a 90m overlay across entire block with the exception of a 'band' of the block directly opposite New Regent Street which has a 28m height control limit. I understand this is due to concerns of potential shading effects and visual dominance effects on New Regent Street. I have reviewed the Council's shade diagrams<sup>1</sup> prepared for this site and the effect a 90m tower would have on New Regent Street. The diagrams do not take into account the following aspects:
- 15.1 90m high built structures on either side of the proposed 28m section on the block defined by Colombo, Armagh, Oxford Terrace and Manchester Street;
  - 15.2 Shading caused by the 28m height control on the remainder of the block defined by Gloucester, Colombo, Armagh and Manchester Streets; and
  - 15.3 Shading effects currently experienced from the existing buildings and verandas on New Regent Street.
- 16 I do not consider that a proposed 90m height control limit on the sites at 129-143 Armagh Street will result in an inappropriate contrast of scale or impact on the architectural and contextual heritage values, nor do I consider that visual dominance is an issue in a central city environment.

<sup>1</sup> [PC-13-s32-Appendix-16-Qualifying-Matter-Central-City-Heritage-Interface-Arts-Centre-and-New-Regent-Street.pdf \(ccc.govt.nz\)](#)

- 17 Contrast of scale is common in urban areas where cities protect heritage buildings and/or gardens while also allowing cities to develop and grow. Inner cities are typically characterised by a mix of architectural styles and scales. Whether a building is 28m or 90m, there will be a contrast of scales between it and the two-storey, 8m high buildings in New Regent Street. This is not considered a negative aspect though. Pacific Tower is an existing example where there is contrast between the taller building and New Regent Street. If anything, having taller buildings around the street will help define it as a space rather than the current situation where there is little sense of enclosure.
- 18 For 129-143 Armagh Street, the road corridor provides a suitable buffer between the heritage buildings on New Regent Street and any future development on the site, also noting that the two end units on New Regent Street are new builds and relatively modern. The two modern units at the northern end of New Regent Street do have a role to play in relating to the heritage buildings and not impacting on their architectural integrity as they physically touch. 129-143 Armagh Street, however, is physically separate from New Regent Street, negating potential visual dominance effects.

#### **CATHEDRAL SQUARE HEIGHT LIMIT**

- 19 With reference to paragraphs 124-128 of Mr Willis' evidence, I largely agree that a 45m height limit should surround Cathedral Square with the exception of 170-184 Oxford Terrace. This site is located on Oxford Terrace and is 54m from Cathedral Square – I do not consider it part of the Cathedral Square precinct.
- 20 I have reviewed the proposed 45m height control for the site at 170-184 Oxford Terrace and prepared a series of images and shade diagrams to show how the building would relate to the adjoining buildings and the extent of shading created by a 90m tower (**Appendix 1**).
- 21 A series of different viewpoints were visited and a 90m building modelled. Of key interest was to determine whether a 45m or 90m building would relate better to the adjoining Te Pae and Midland building, both of which have a 90m height control overlay. I consider there is no benefit in limiting any future on this site to 45m. The site, immediately adjacent to the Ōtākaro-Avon River corridor, and any development would enjoy expansive views of the open space and Victoria Square. Whether the building is 45m or 90m, neither building will achieve a consistent form to that of Te Pae or the Midland building.
- 22 The 90m building provides legibility benefits for the city centre as well as provide more development potential without creating adverse effects.



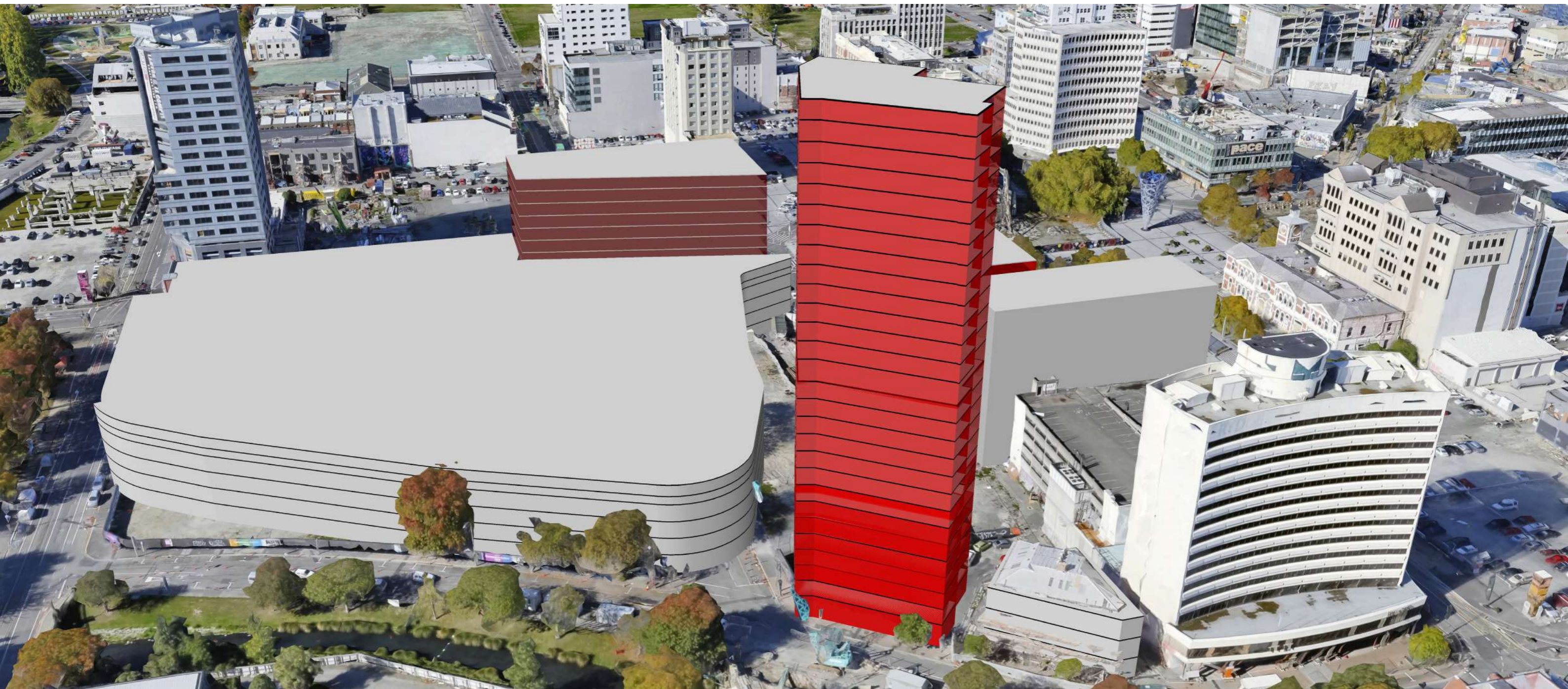
- 23 The Rydges Hotel building is 60m in height. Any proposed buildings around the north-western corner of Cathedral Square could be 45m in height. These buildings, along with the Rydges Hotel, have been modelled and incorporated into the shade diagrams.
- 24 The diagrams show that a 90m tower creates a Very Low magnitude of change of additional shading issues over Cathedral square when the buildings on the north-western corner are built to 45m.
- 24.1 In winter, a 45m building on the site and on the north-western corners of the square create shade across Cathedral Square from 2-4pm in the afternoon. There is no additional shading on the Square caused by a 90m building on the 170-184 Oxford Terrace site.
- 24.2 In spring/autumn equinoxes, shade from the 90m tower falls onto the parking building on the northern side of Worcester Boulevard from 12pm and moves round to fall on a new 45m building on the old Grant Thornton site. A small section of the square, highlighted green on page 14 of Appendix one, is shaded from 3pm through to 5pm.
- 24.3 In summer, Cathedral Square is not affected by a 90m high building.
- 25 I consider that 170-184 Oxford Terrace should have a 90m height control overlay as per the Midland Building and Te Pae sites. This is also confirmed by the diagrams and discussion in PC14 – Section 32: Lower Heights Limits: Victoria St and Cathedral Square Qualifying Matter - Appendix 3: Cathedral Square Sunlight Study which recommends Scenario 3 45m Adjacent, 90m key sites. This scenario is recommended by the author, noting that 170 Oxford Terrace shades Cathedral Square less than 732 Colombo Street which is proposed to have a 90m height control.

### **RESIDENTIAL AND COMMERCIAL ZONE**

- 26 With respect to specific rules in the Residential and Commercial Zone chapters, I have read and agree with the evidence of Mr Phillips who details the changes sought. Many of the rules are considered overly prescriptive, have a high potential to lead to poor design outcomes, do not provide for the diversity of lot shapes within the central city, and are not necessary when there are urban design controls/certification already in place which promote a more holistic design approach.

**Dave Compton-Moen**

**20 September 2023**



APPENDIX ONE - URBAN DESIGN ASSESSMENT FIGURES

PC14 SUBMISSION - 170-184 OXFORD TERRACE  
FOR CARTER GROUP  
20 SEPTEMBER 2023

REVISION B



## PROJECT NAME

Project no: 2023\_161  
Document title: Urban Design Assessment  
Revision: B  
Date: 20 September 2023  
Client name: Carter Group

Author: David Compton-Moen

File name: \\goose\Storage\4\_DCM - Projects\2019\_064 Carter Cathedral Square Hotel\3\_Working Files\4\_InDesign\2023\_161 Carter Cathedral Square Hotel\_LVIA.indd

## DOCUMENT HISTORY AND STATUS

REVISION	DATE	DESCRIPTION	BY	REVIEW	APPROVED
A	12/09/2023	Daft issue for comment	JR	DCM	DCM
B	20/09/2023	Additional pages/shade analysis	JR	DCM	DCM



## DCM URBAN DESIGN LIMITED

Level 3, 329 Durham Street North  
Christchurch 8013

COPYRIGHT: The concepts and information contained in this document are the property of DCM Urban Design Limited. Use or copying of this document in whole or in part without the written permission of DCM Urban Design Limited constitutes an infringement of copyright.

## CONTENTS

PROPOSAL - ARCHITECTS DRAWING	3
PROPOSAL - CONTEXT	4
CONTEXT - DISTRICT PLAN	5
CONTEXT - LOCATION MAP 1:2000	6
VIEWPOINT 1 INTERSECTION BETWEEN GLOUCESTER STREET AND DURHAM STREET NORTH	7
VIEWPOINT 2 VIEW WEST, TŪRANGA LIBRARY	8
VIEWPOINT 3 VIEW NORTH WEST, CHALICE SCULPTURE	9
ALL HOTELS   SHADOW ANALYSIS SUMMER SOLSTICE 21ST DECEMBER	10 - 11
ALL HOTELS   SHADOW ANALYSIS SPRING / AUTUMN EQUINOX 21ST MARCH/SEPTEMBER	12 - 13
ALL HOTELS   SHADOW ANALYSIS WINTER SOLSTICE 21 JUNE	14 - 15

**LANDSCAPING LEGEND**

- SOFT LANDSCAPING
- PAVING



**NOTE 1:** ALL BUILDING FOOTPRINTS SHOWN ARE TO THE MAXIMUM BUILDING FOOTPRINTS. THE BUILDING FOOTPRINTS AND / OR PARTS OF BUILDING FOOTPRINTS MAY BE REDUCED AND THEREFORE THE BUILDING FOOTPRINTS MAY BE LESS THAN THOSE SHOWN.

**NOTE 2:** BALCONIES & ARCHITECTURAL FEATURES OF HOTELS 1, 2 & 3 AND SERVICED APARTMENTS TO PROJECT 1m BEYOND PROPERTY BOUNDARIES.

**1** GROUND LEVEL SITE PLAN  
1 : 500

**PROPOSED DEVELOPMENT ADJACENT CONVENTION CENTRE**

**DATE /** 31/07/2019

**SCALE /** 1 : 500 @ A3

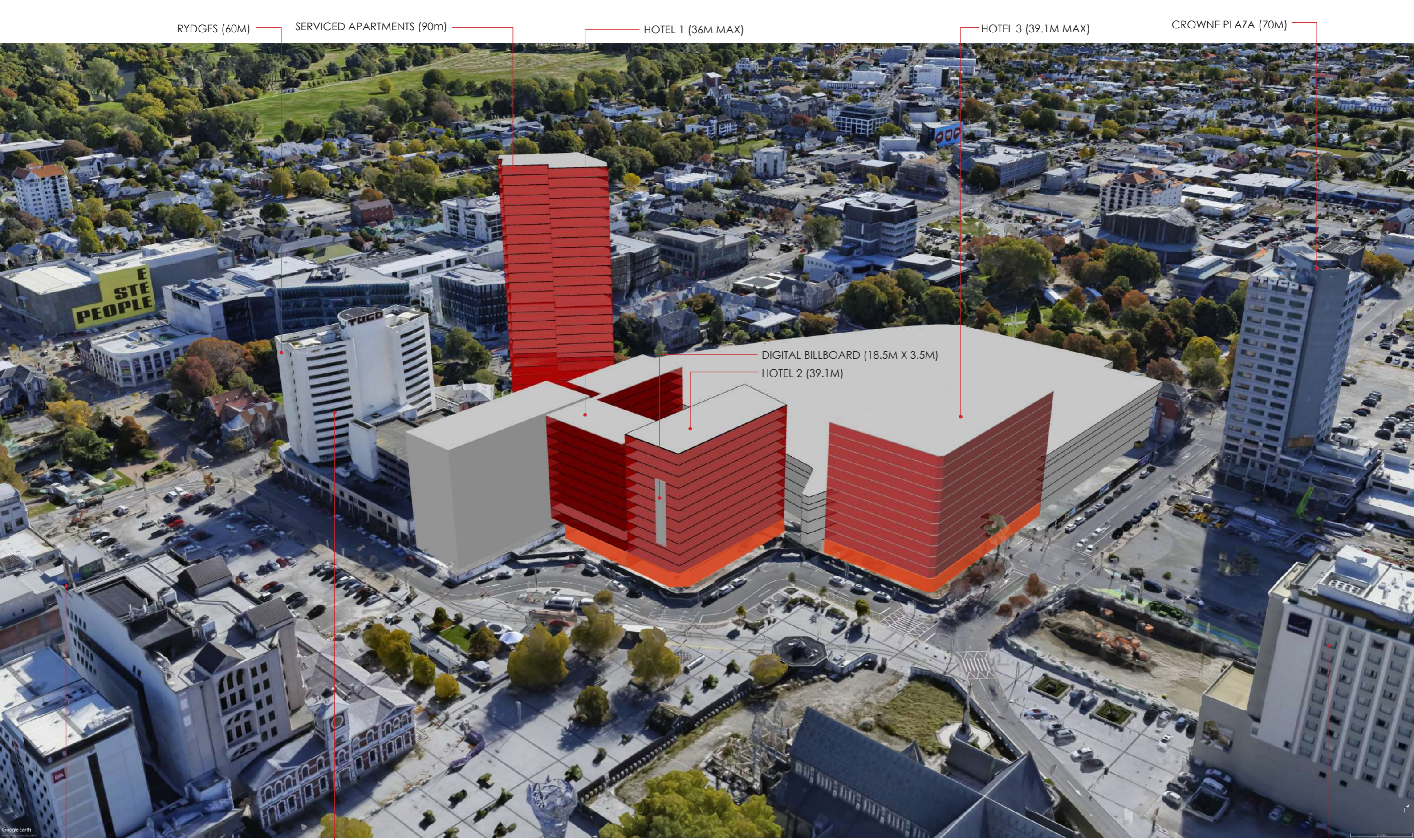


**Wilson+HillArchitects**

URBAN DESIGN ASSESSMENT FIGURES

**PROPOSAL - ARCHITECTS DRAWING**

PC14 SUBMISSION - 170-184 OXFORD TERRACE



RYDGES (60M)

SERVICED APARTMENTS (90m)

HOTEL 1 (36M MAX)

HOTEL 3 (39.1M MAX)

CROWNE PLAZA (70M)

DIGITAL BILLBOARD (18.5M X 3.5M)

HOTEL 2 (39.1M)

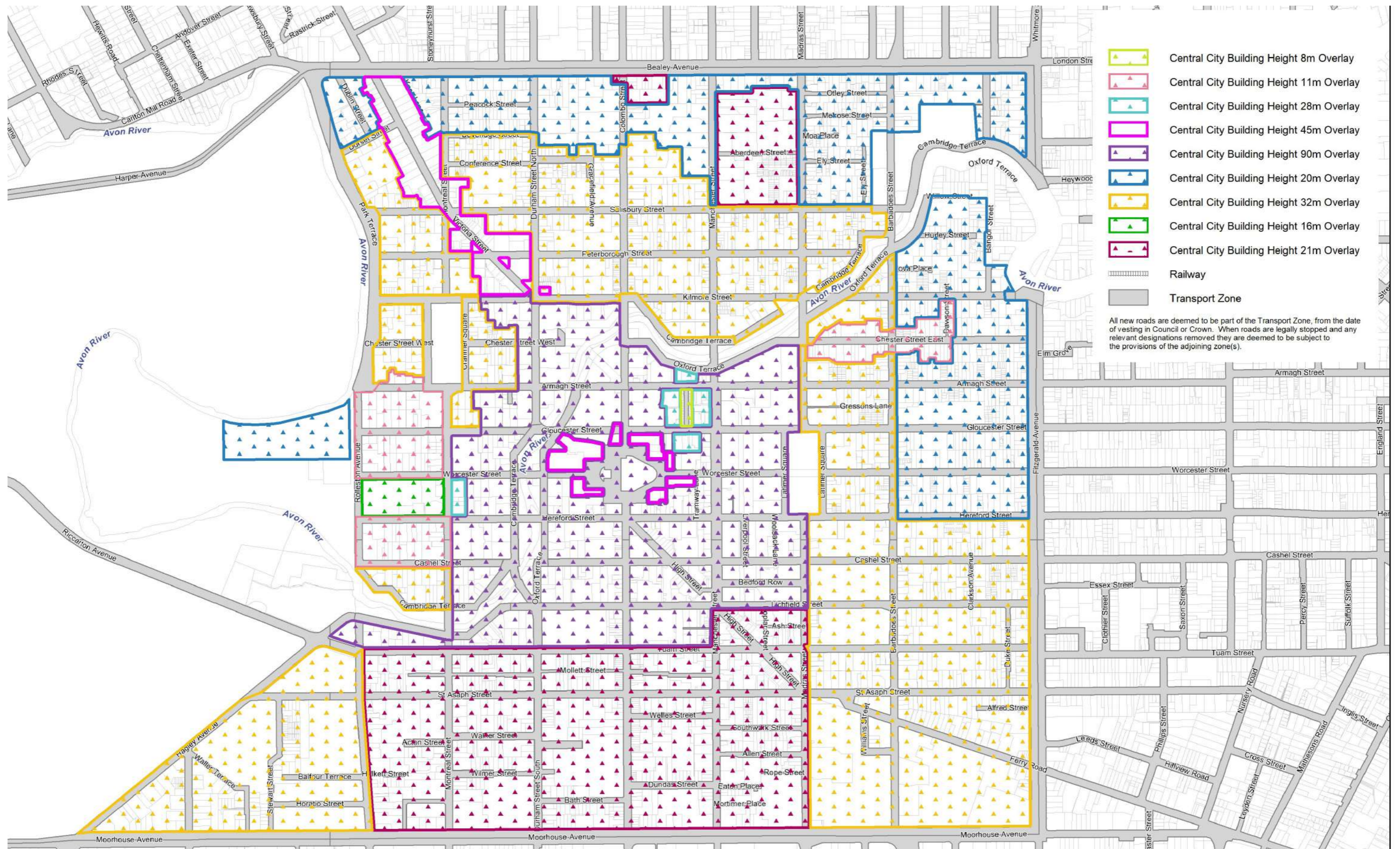
TELECOM BUILDING (40M)

REPLACEMENT OF FORMER GOVERNMENT LIFE BUILDING (35M)

NOVOTEL HOTEL (45M)  
MILLENNIUM HOTEL (OUT OF SHOT 45M)

URBAN DESIGN ASSESSMENT FIGURES  
**PROPOSAL - CONTEXT**  
PC14 SUBMISSION - 170-184 OXFORD TERRACE

KEY  
ACTIVE EDGE

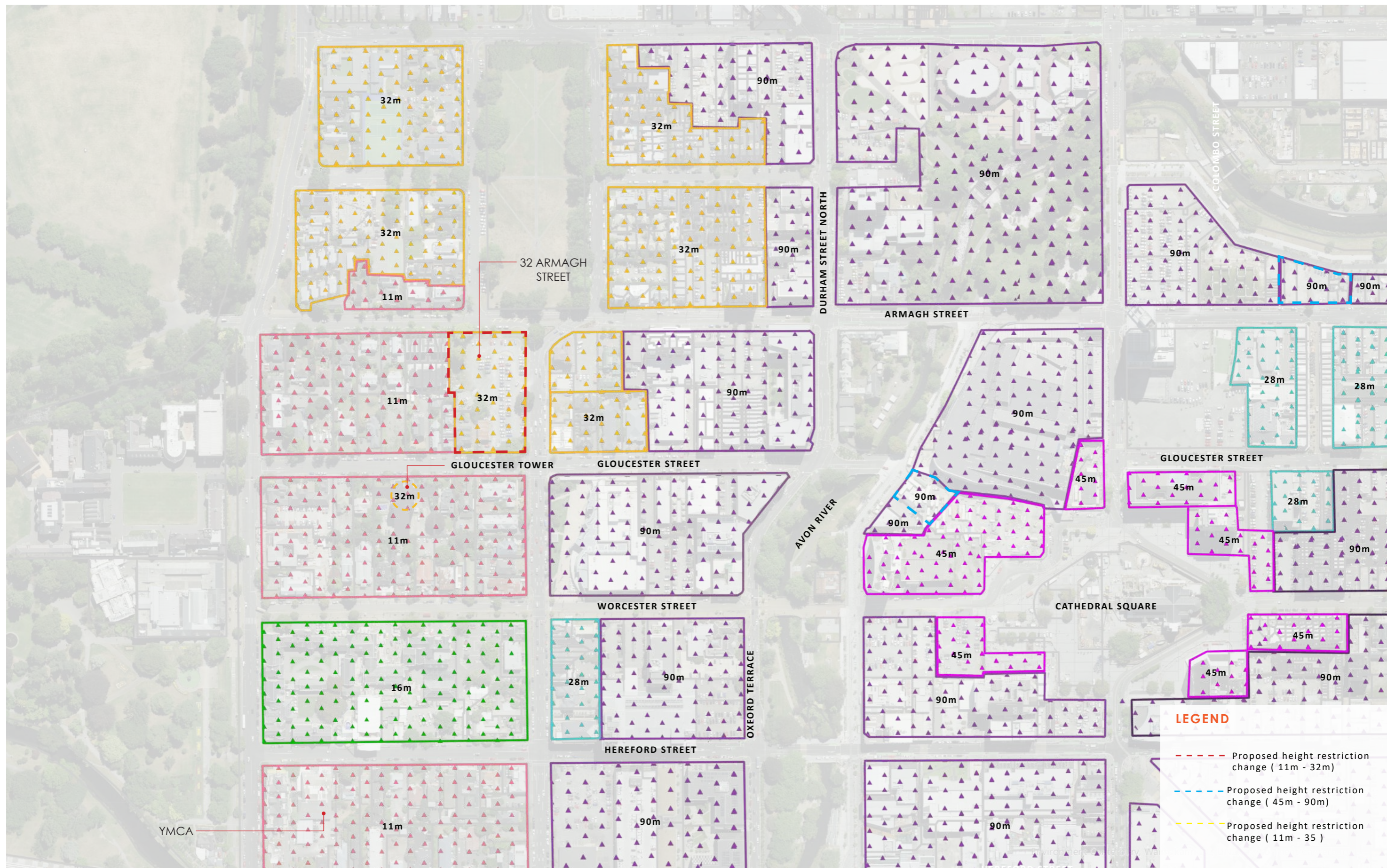


Map / image source: Christchurch District Plan

URBAN DESIGN ASSESSMENT FIGURES

# CONTEXT - DISTRICT PLAN

PC14 SUBMISSION - 170-184 OXFORD TERRACE





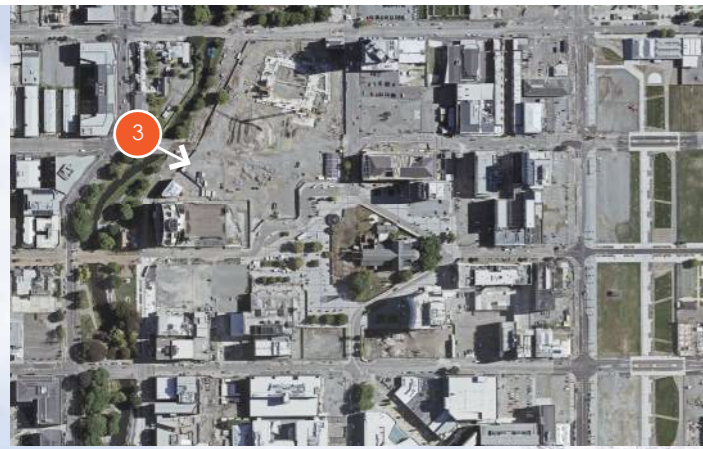
Map / image source: CanterburyMaps

URBAN DESIGN ASSESSMENT FIGURES

# CONTEXT - LOCATION MAP 1:2000

PC14 SUBMISSION - 170-184 OXFORD TERRACE





A. IMAGE LOCATION

PROPOSED 90M HIGH BUILDING

CONVENTION CENTRE

PROPOSED 45M HIGH BUILDING

MIDLAND BUILDING

RYDGES HOTEL (60M)



B. PROPOSED VIEW

URBAN DESIGN ASSESSMENT FIGURES

1

VP1 - VIEW EAST, INTERSECTION GLOUCESTER STREET DURHAM STREET NORTH

PC14 SUBMISSION - 170-184 OXFORD TERRACE

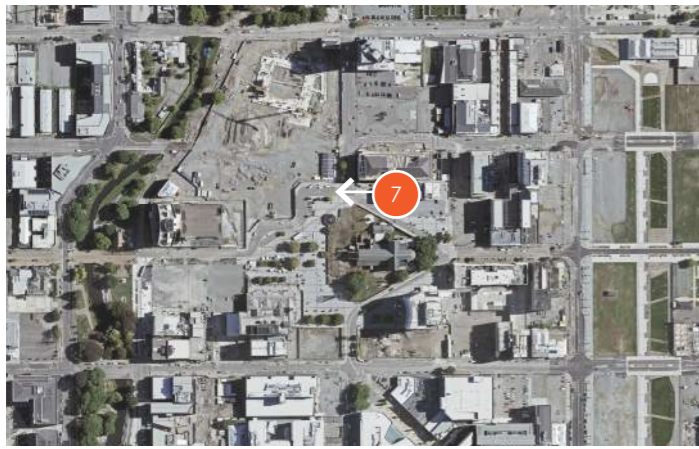
Image captured on Sony ILCE-6000

Focal length of 50mm

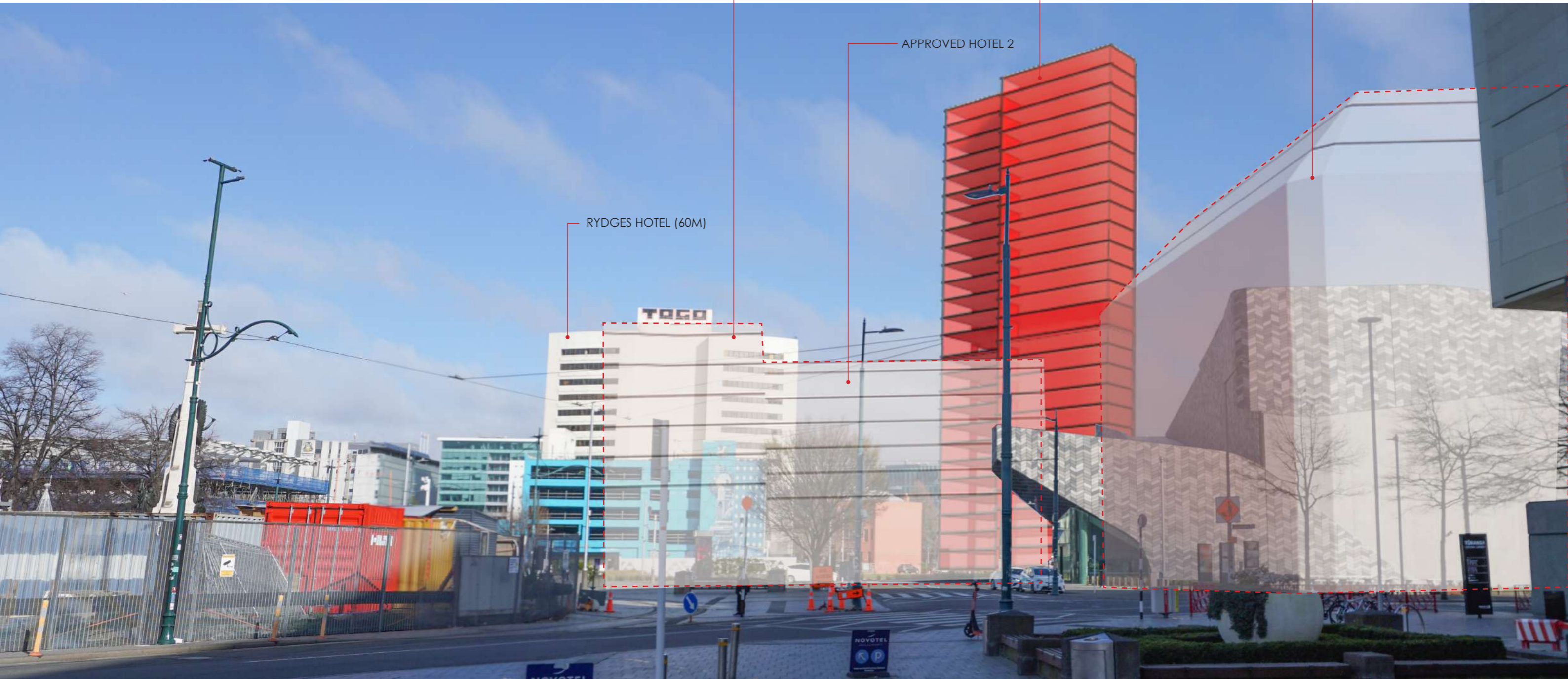
Date: 8 September 2023 at 9:20am

Height of 1.7 metres

(4) single portrait photos merged in Photoshop CS to create panorama



A. IMAGE LOCATION

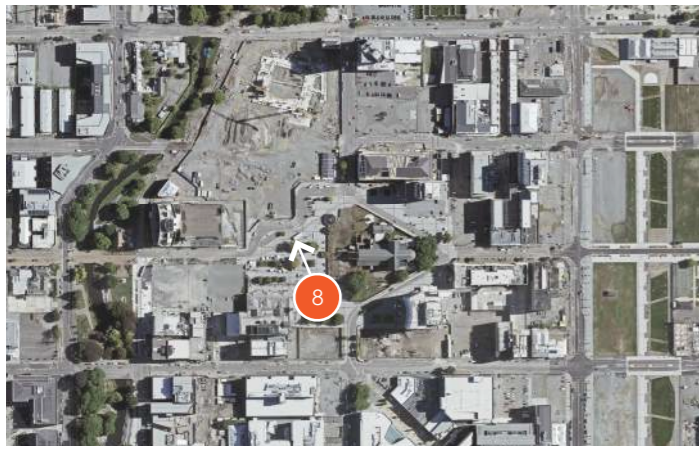


B. PROPOSED VIEW

URBAN DESIGN ASSESSMENT FIGURES

2 VP2 - VIEW WEST, TŪRANGA LIBRARY  
PC14 SUBMISSION - 170-184 OXFORD TERRACE

Image captured on Sony ILCE-6000  
Focal length of 50mm  
Date: 8 September 2023 at 9:25am  
Height of 1.7 metres  
(4) single portrait photos merged in Photoshop CS to create panorama



A. IMAGE LOCATION

RYDGES HOTEL (60M)

PROPOSED 90M HIGH BUILDING

APPROVED HOTEL 1

APPROVED HOTEL 2

APPROVED HOTEL 3



B. PROPOSED VIEW

URBAN DESIGN ASSESSMENT FIGURES

3 VP3 - VIEW NORTH WEST, CHALICE SCULPTURE

PC14 SUBMISSION - 170-184 OXFORD TERRACE

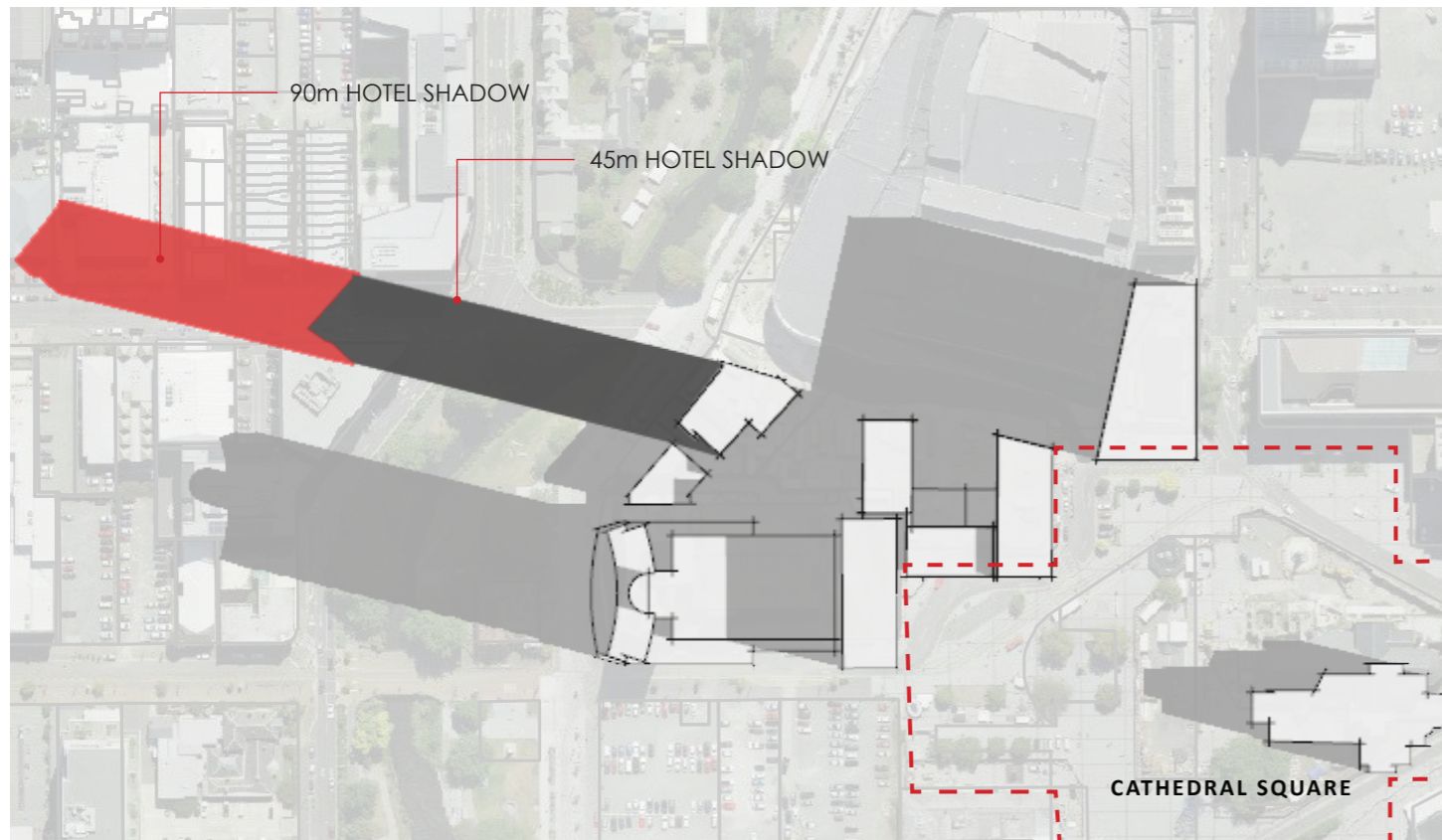
Image captured on Sony ILCE-6000

Focal length of 50mm

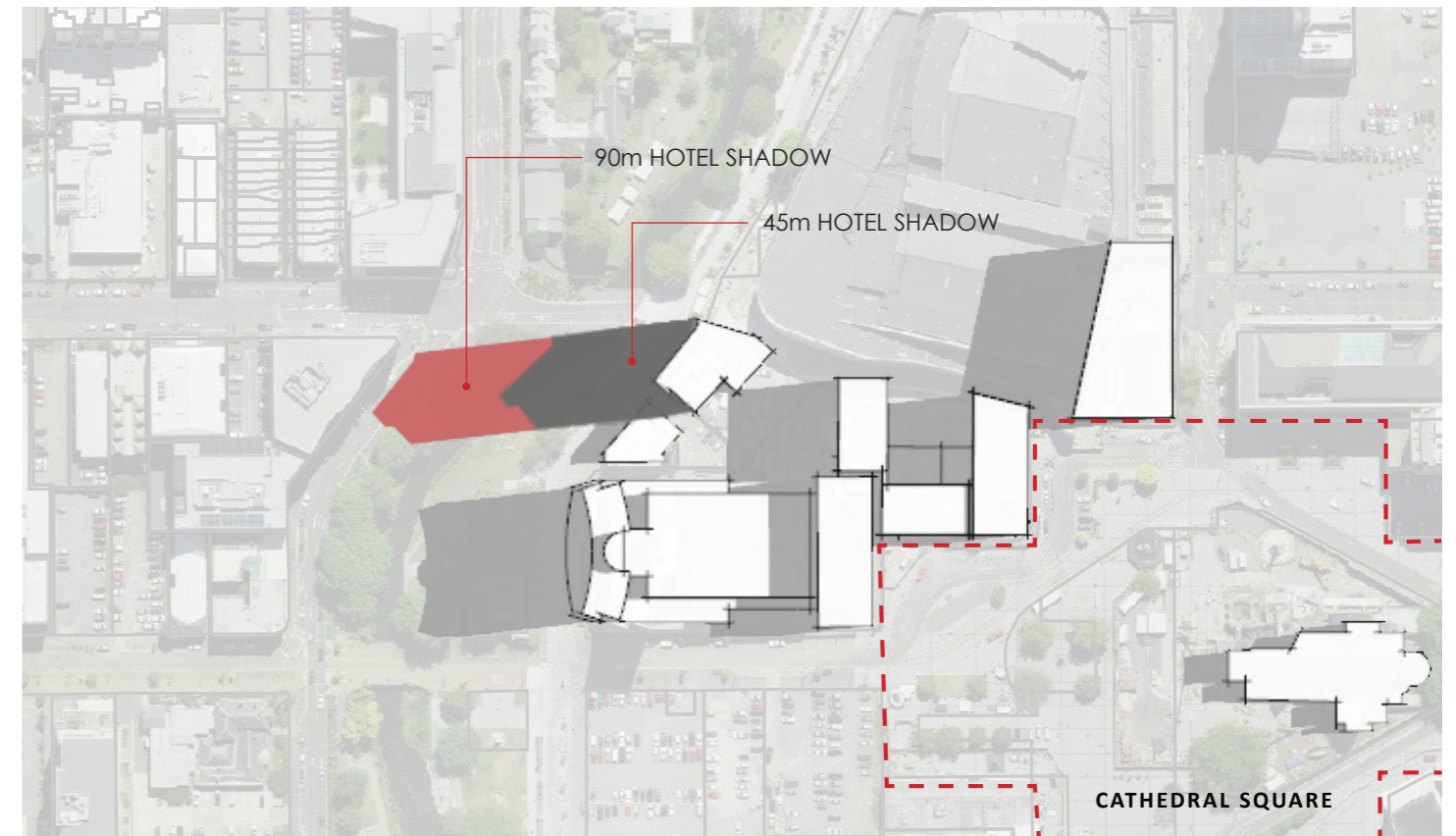
Date: 8 September 2023 at 9:32am

Height of 1.7 metres

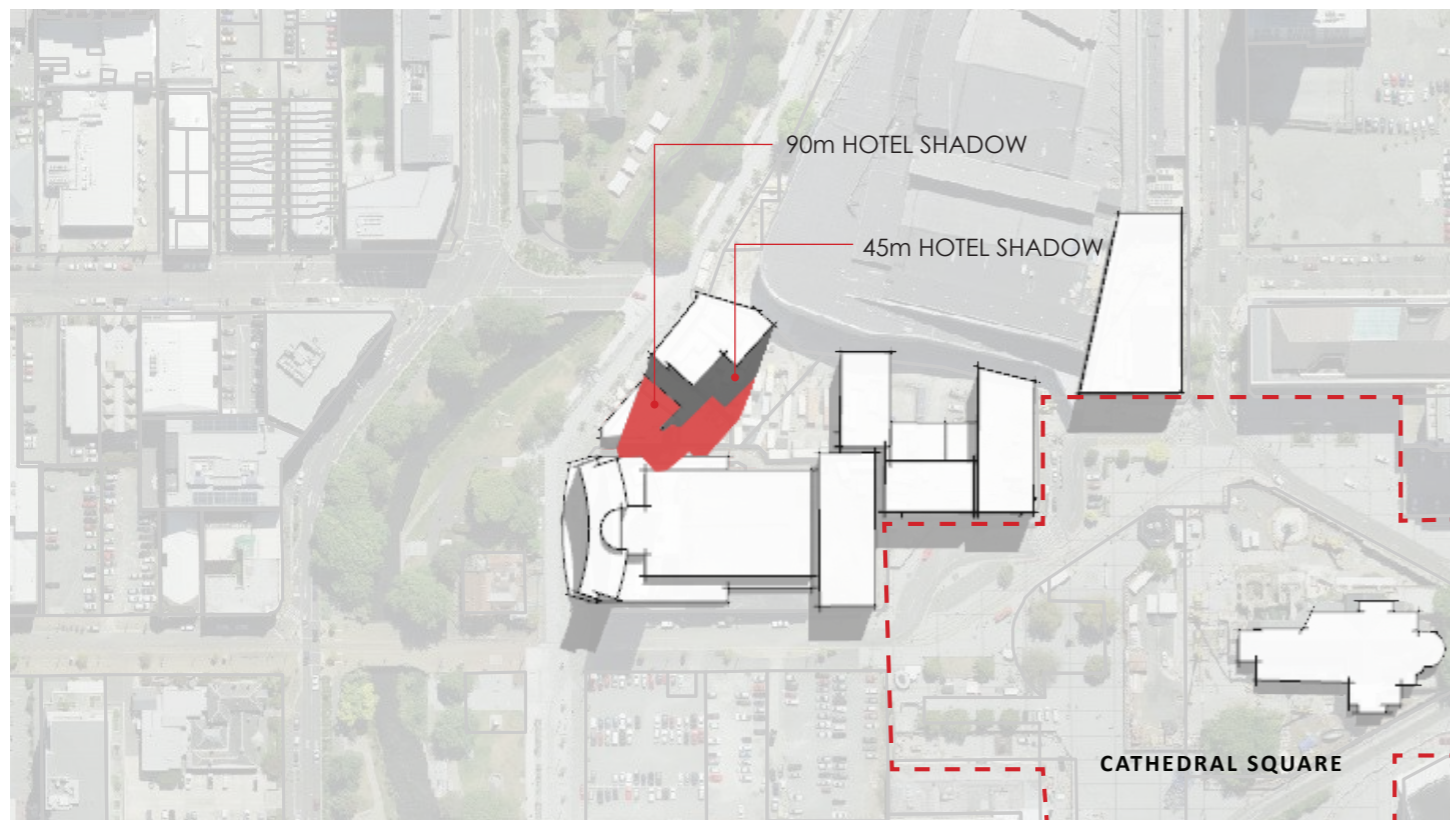
(4) single portrait photos merged in Photoshop CS to create panorama



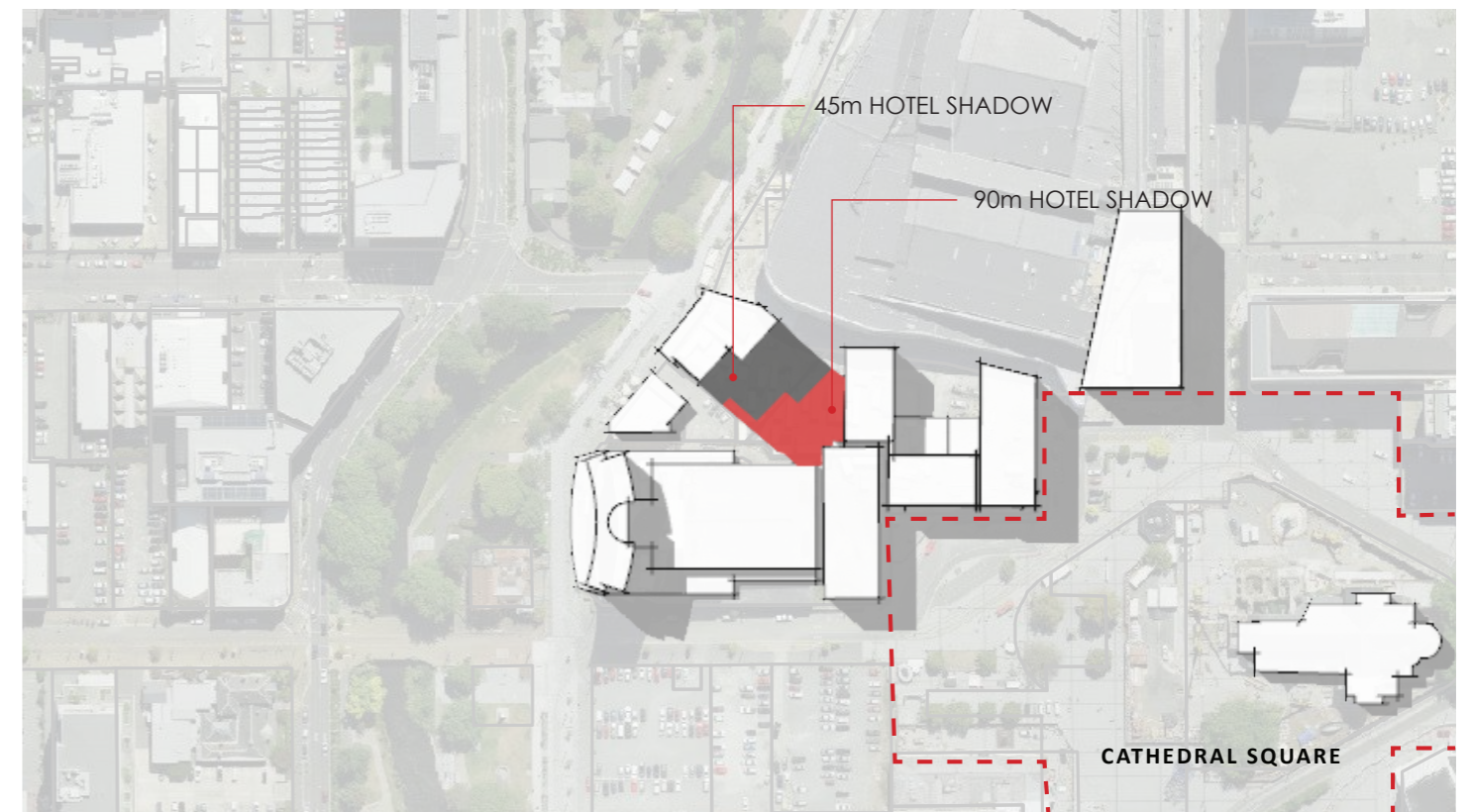
A. 7AM 21ST DECEMBER



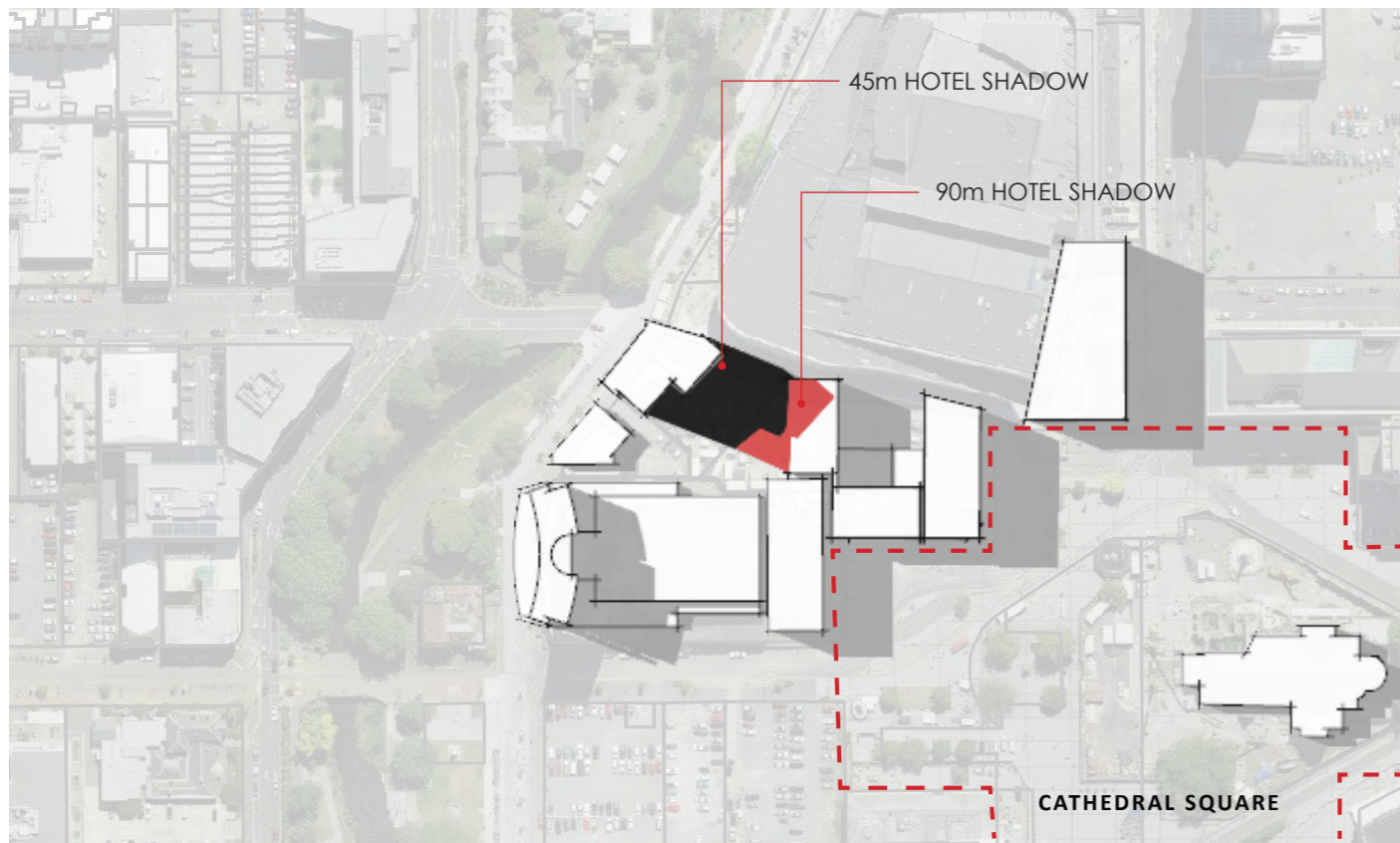
B. 9AM 21ST DECEMBER



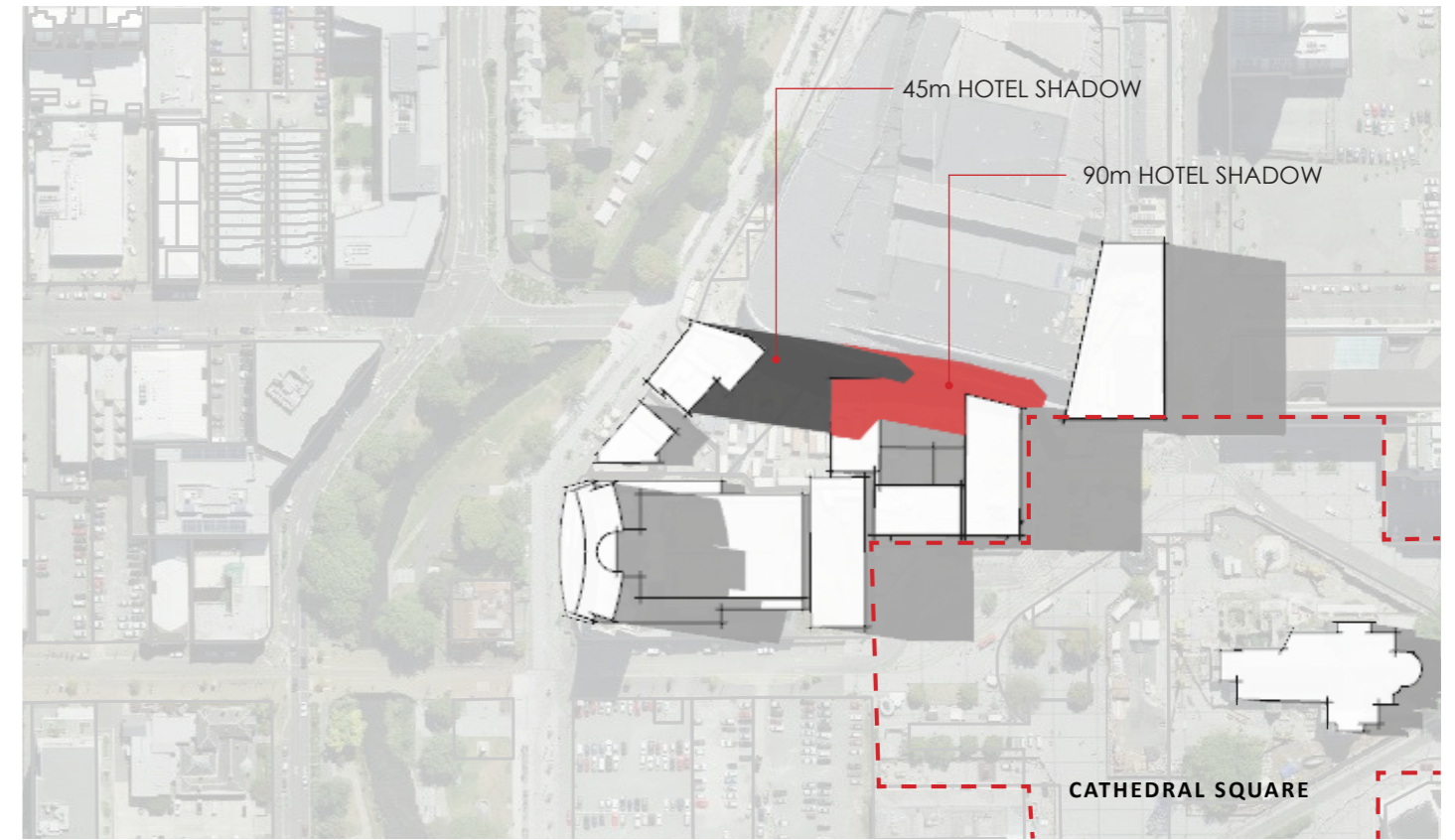
C. 12PM 21ST DECEMBER



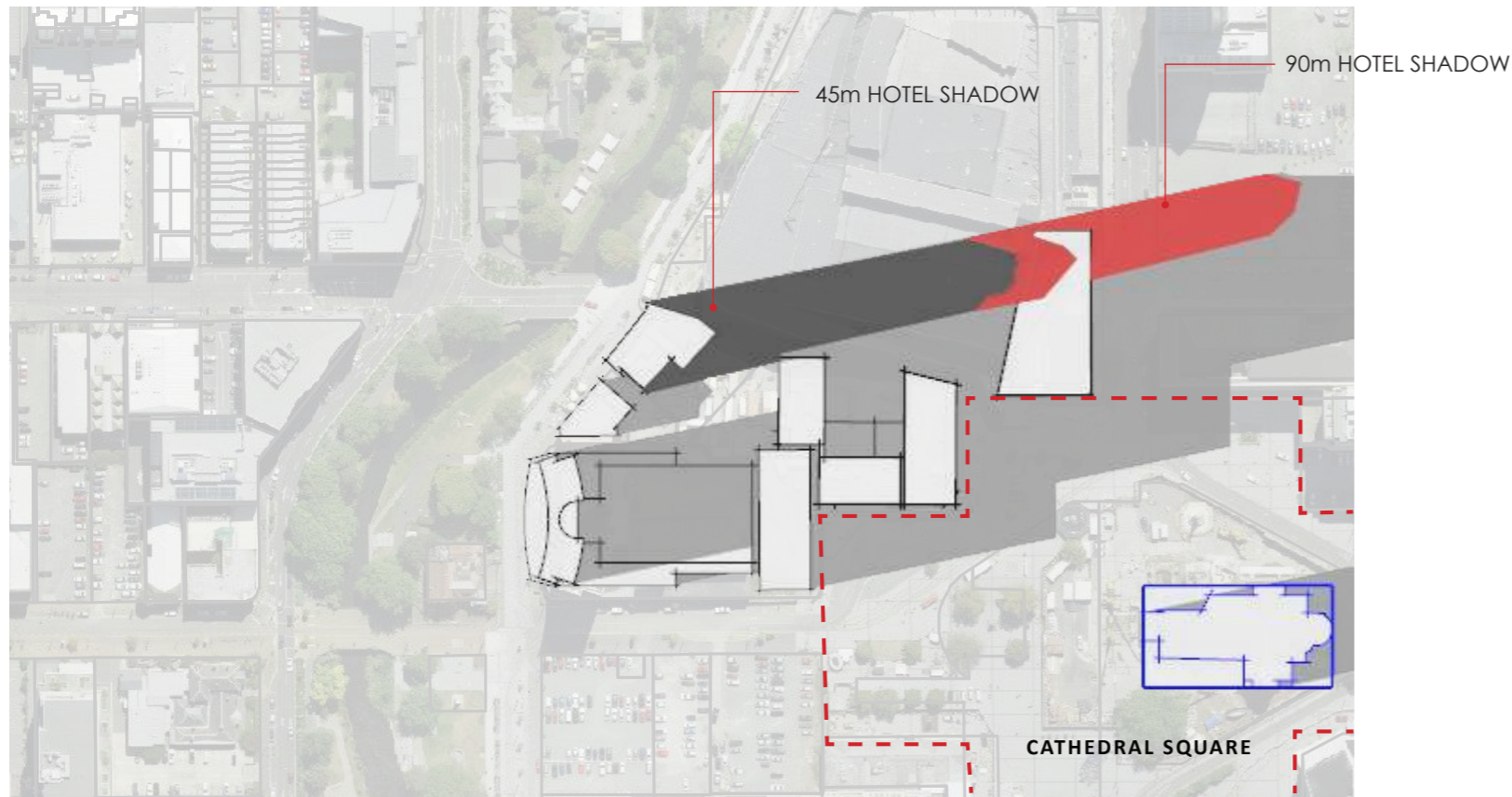
D. 2PM 21ST DECEMBER



E. 3PM 21ST DECEMBER



F. 4PM 21ST DECEMBER

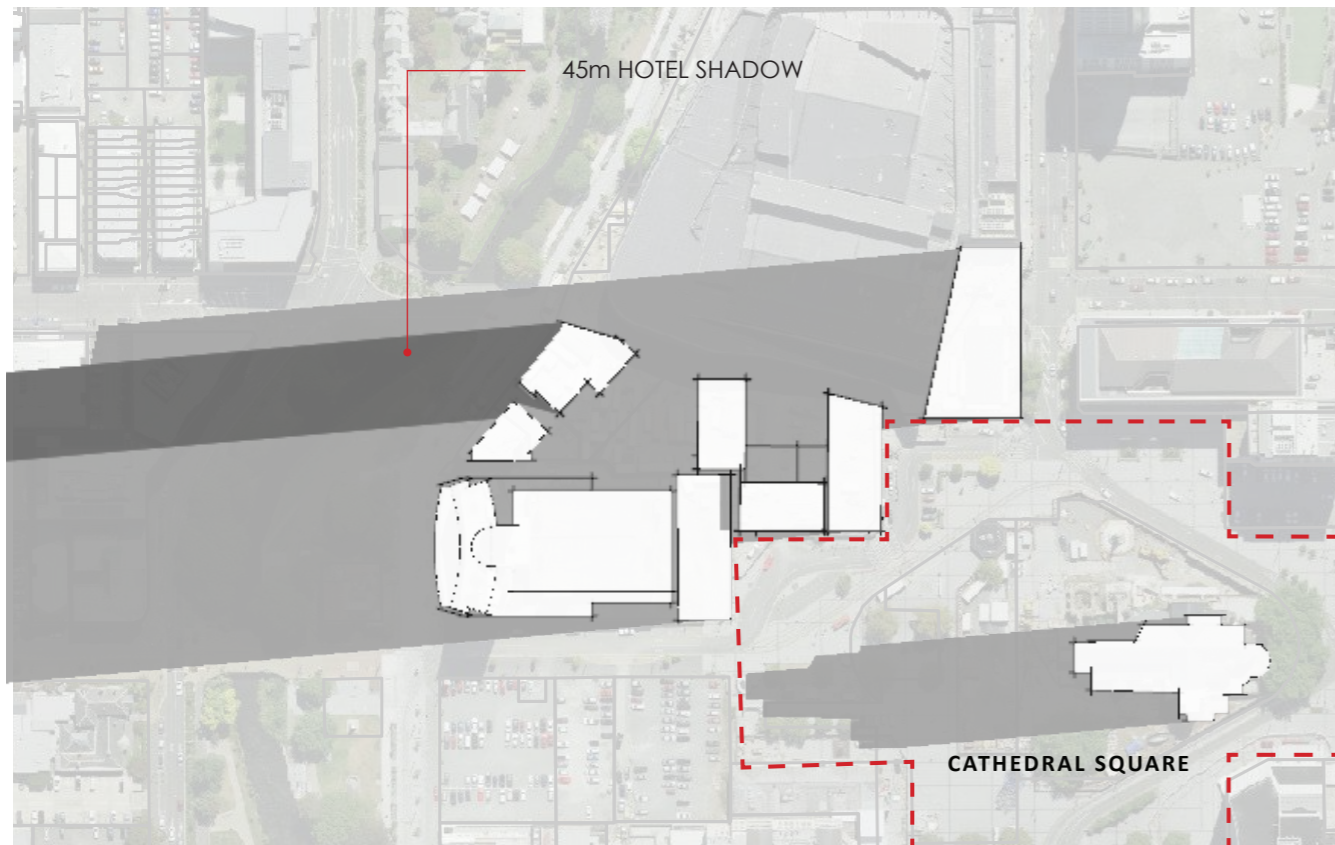


G. 6PM 21ST DECEMBER

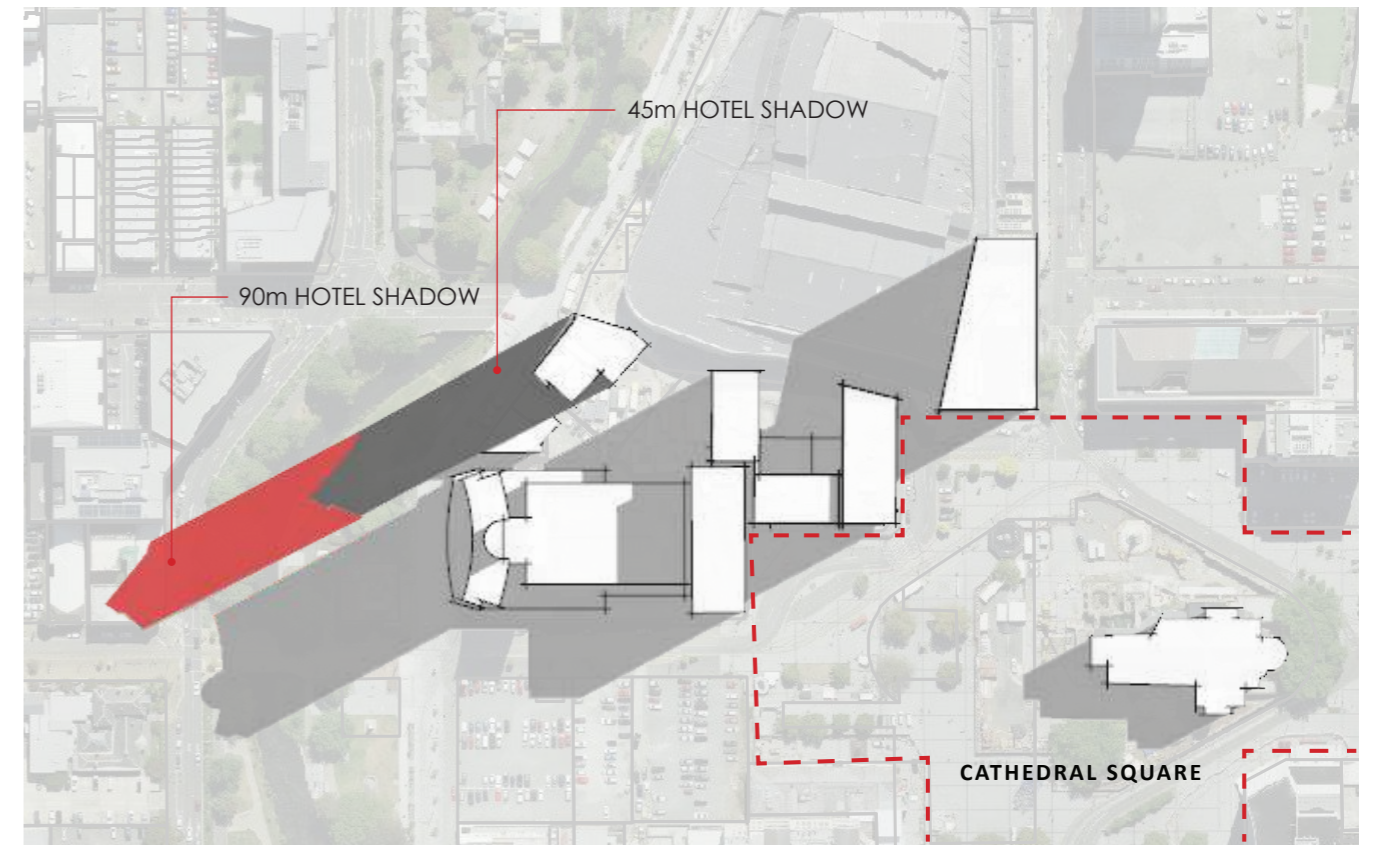
LANDSCAPE AND VISUAL IMPACT ASSESSMENT FIGURES

# ALL HOTELS | SHADOW ANALYSIS SUMMER SOLSTICE

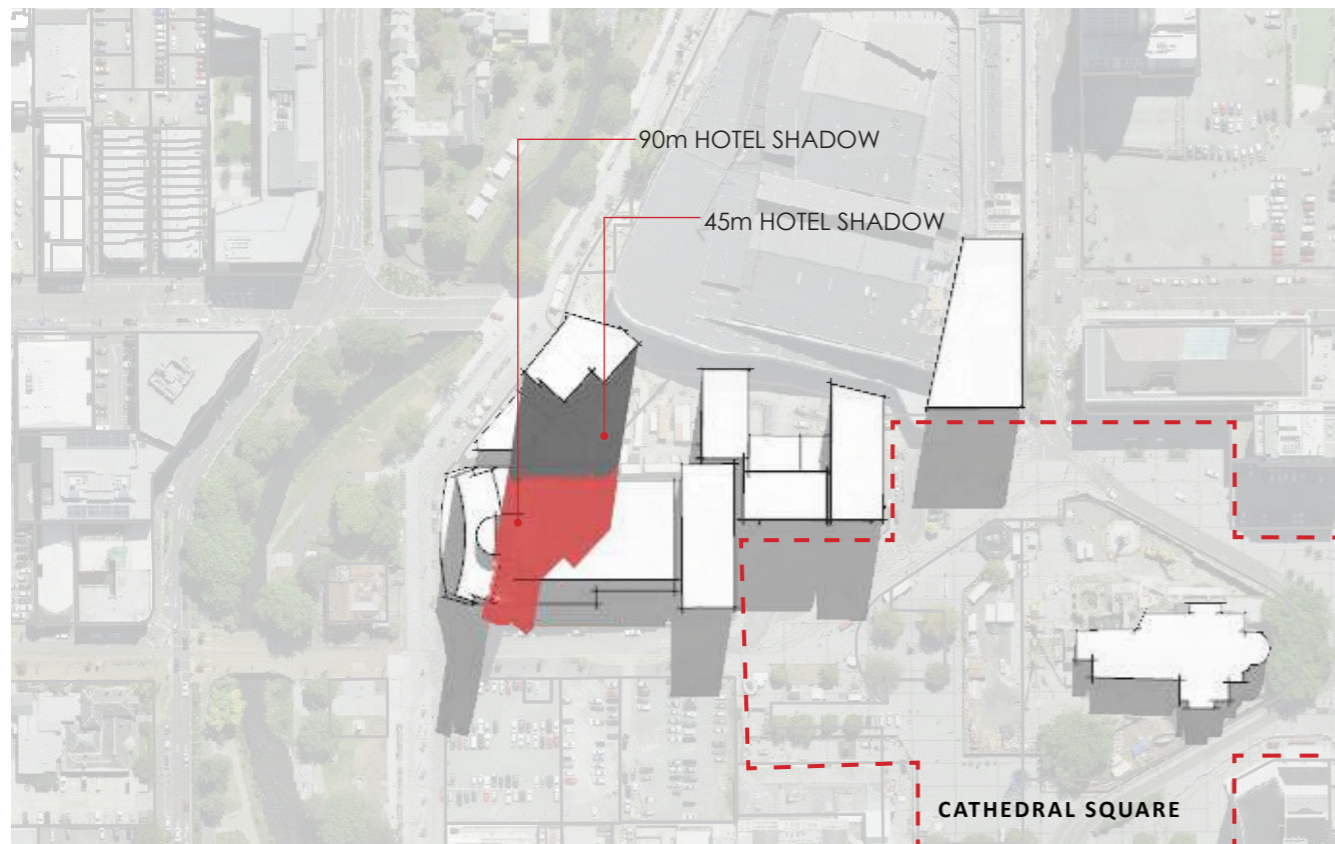
PC14 SUBMISSION - 170-184 OXFORD TERRACE



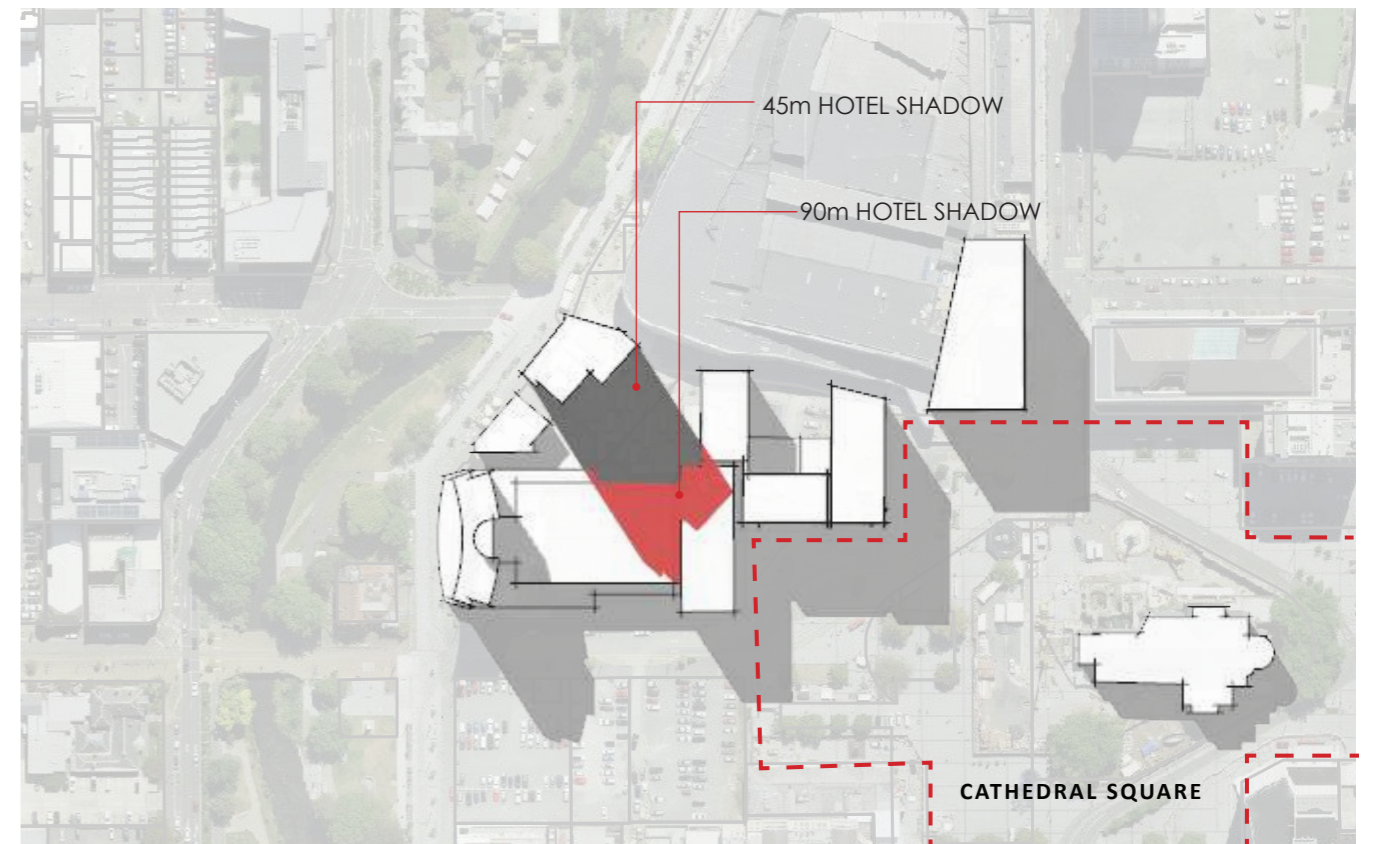
A. 7AM 21ST MARCH / SEPTEMBER



B. 9AM 21ST MARCH / SEPTEMBER



C. 12PM 21ST MARCH / SEPTEMBER

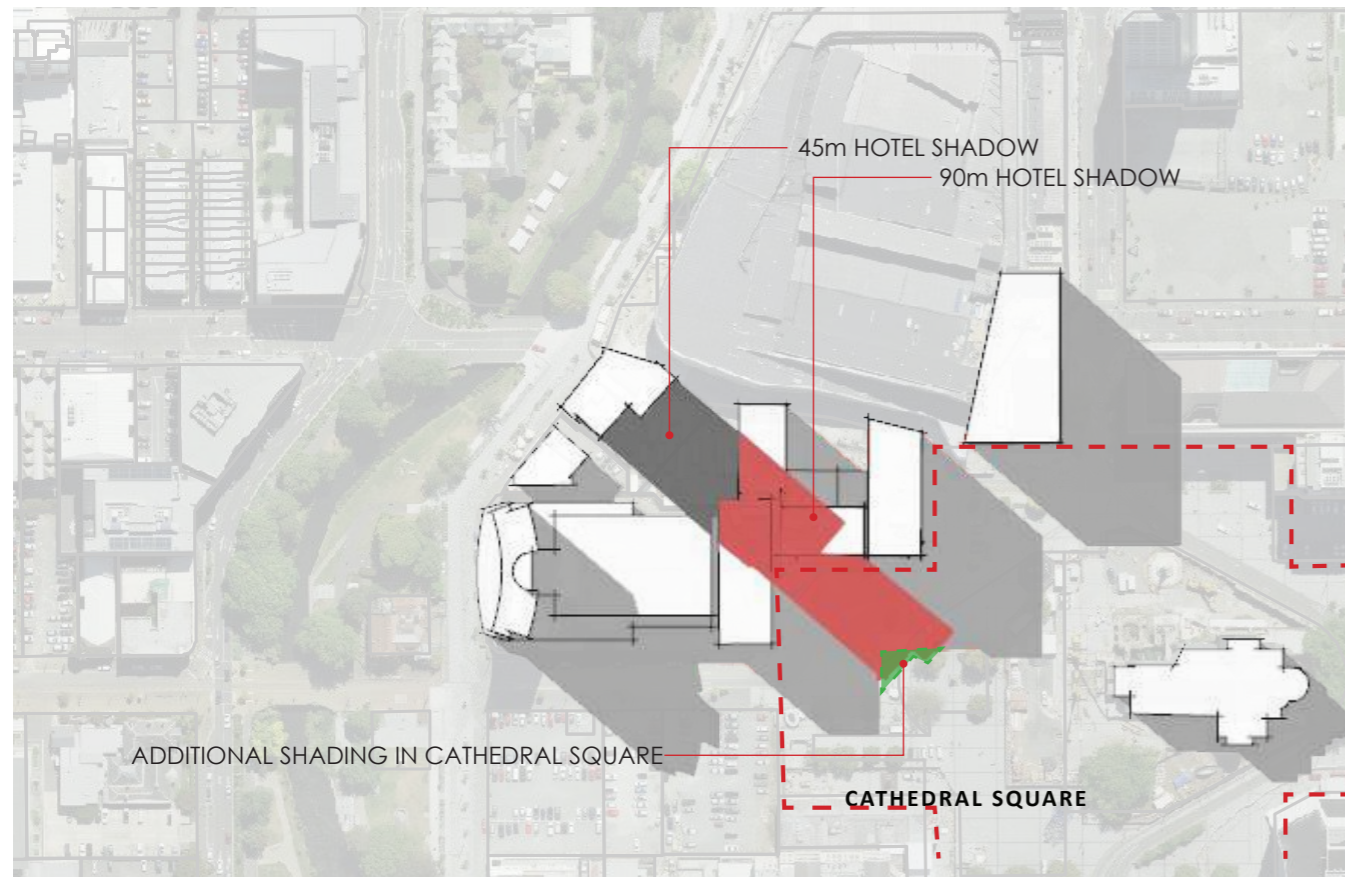


D. 2PM 21ST MARCH / SEPTEMBER

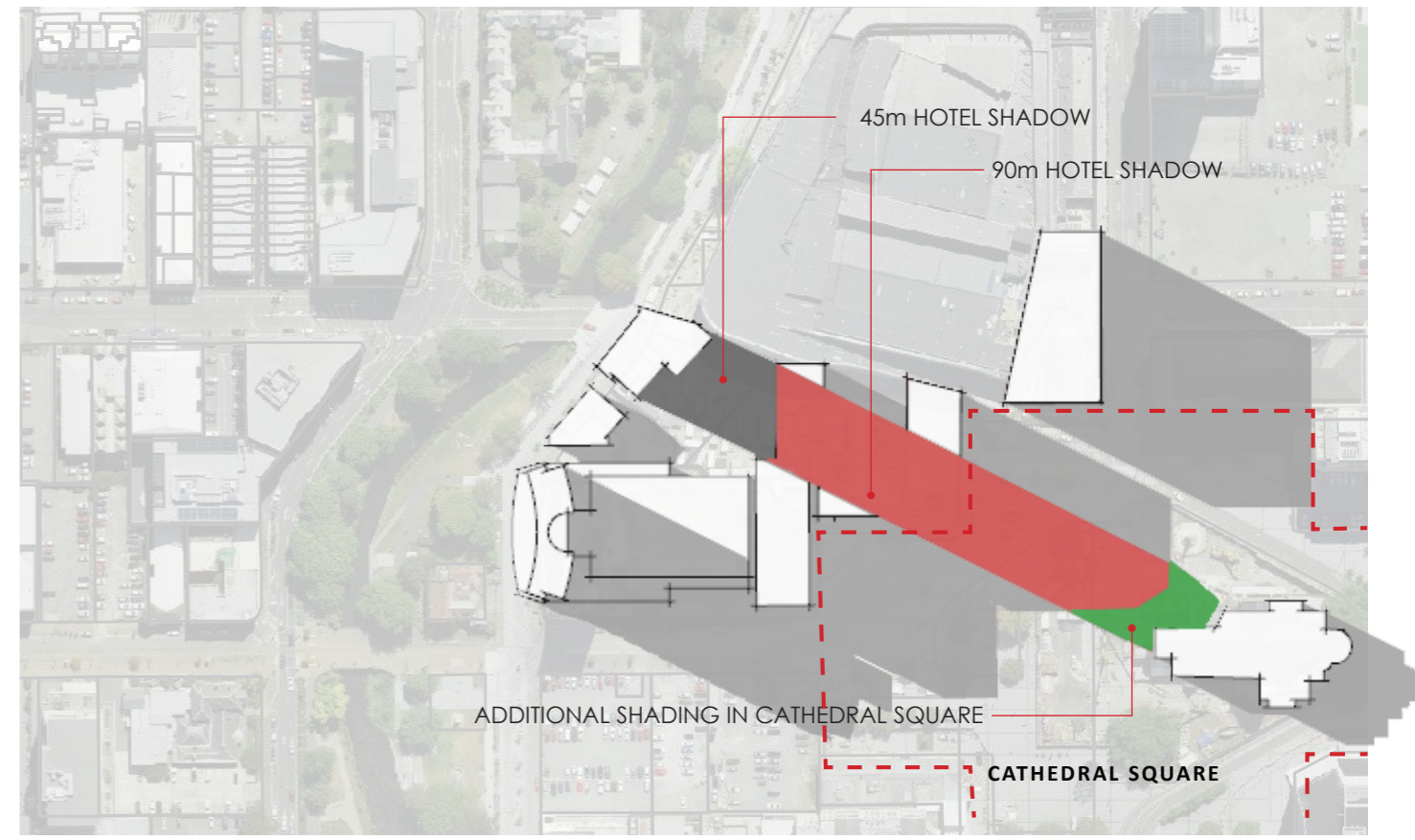
LANDSCAPE AND VISUAL IMPACT ASSESSMENT FIGURES

# ALL HOTELS | SHADOW ANALYSIS SPRING / AUTUMN EQUINOX

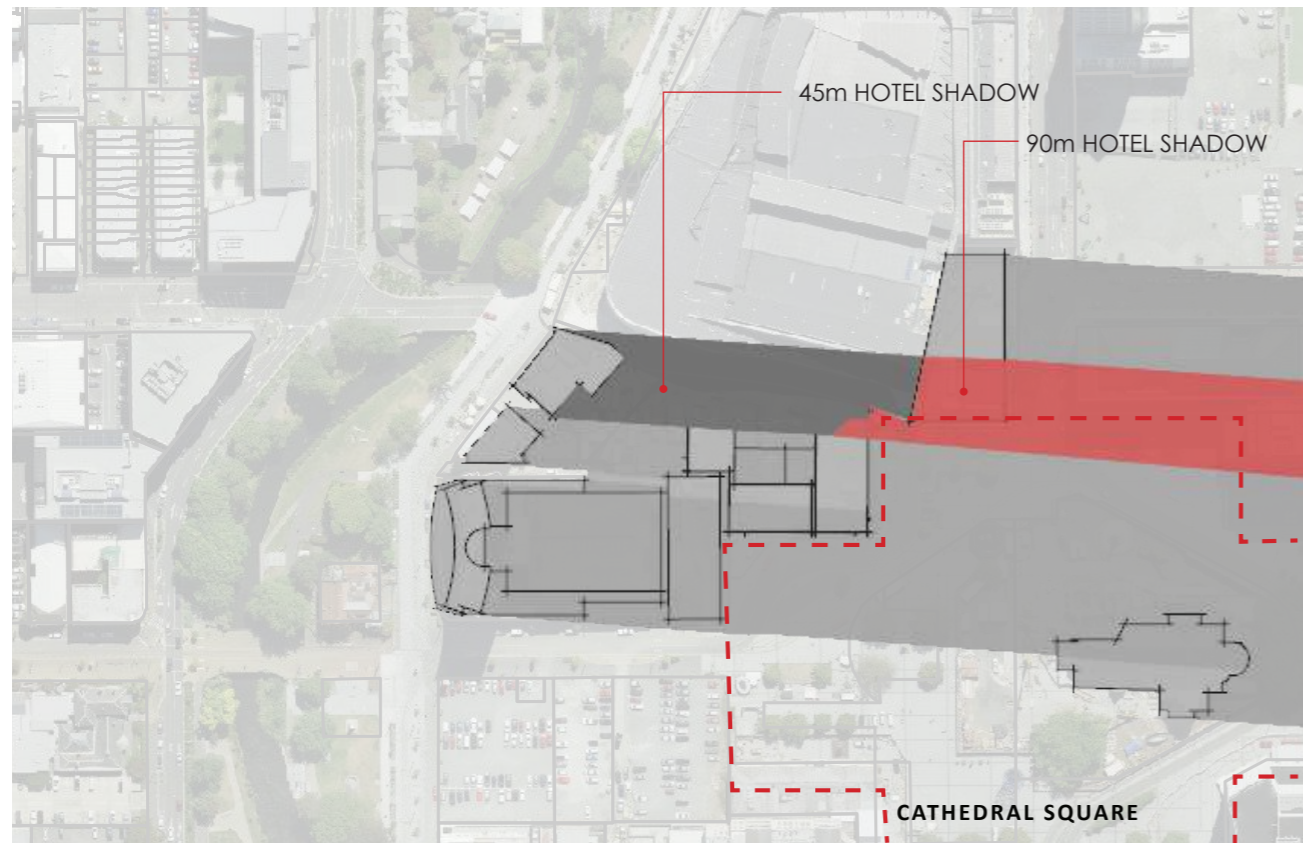
PC14 SUBMISSION - 170-184 OXFORD TERRACE



E. 3PM 21ST MARCH / SEPTEMBER



F. 4PM 21ST MARCH / SEPTEMBER

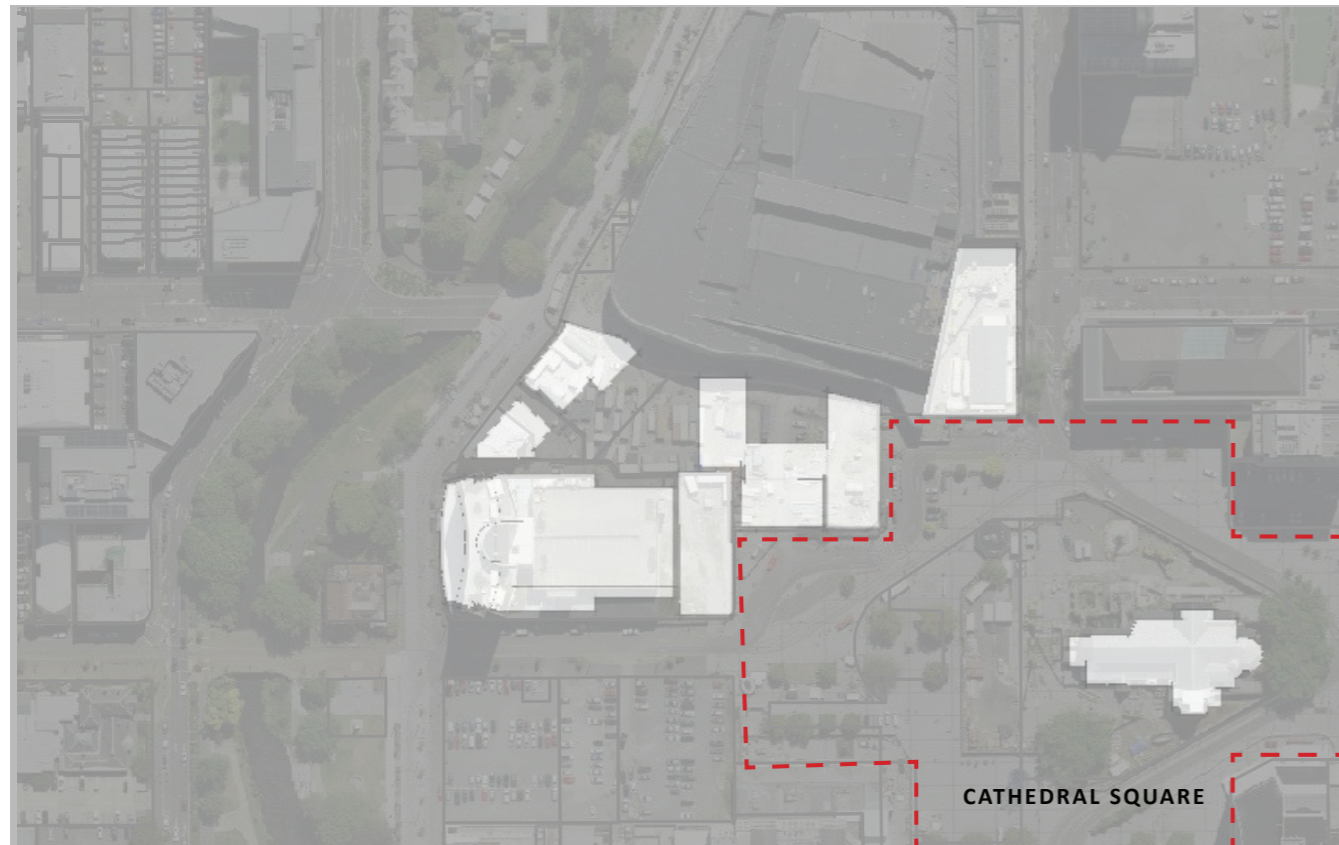


G. 6PM 21ST MARCH / SEPTEMBER

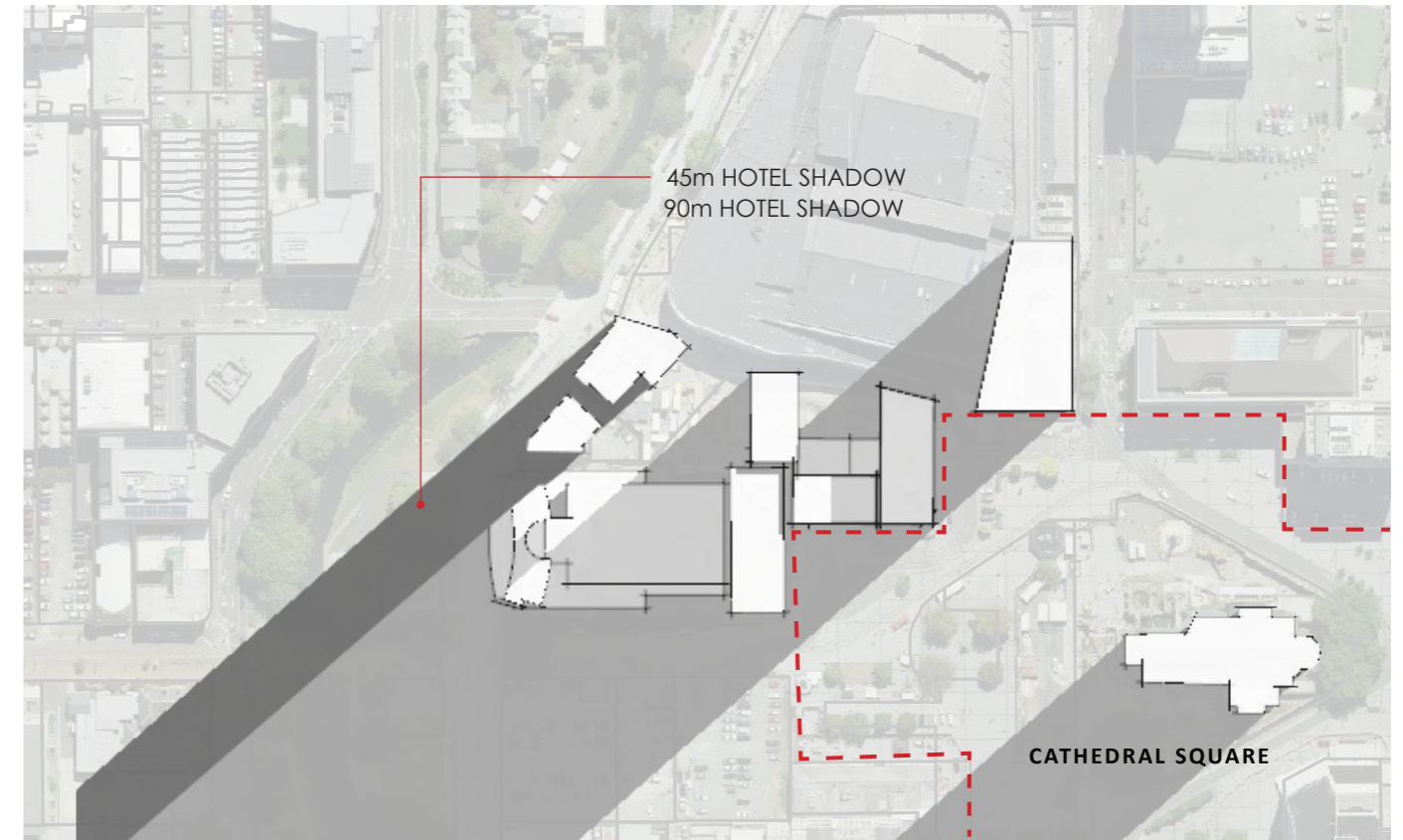
LANDSCAPE AND VISUAL IMPACT ASSESSMENT FIGURES

# ALL HOTELS | SHADOW ANALYSIS SPRING / AUTUMN EQUINOX

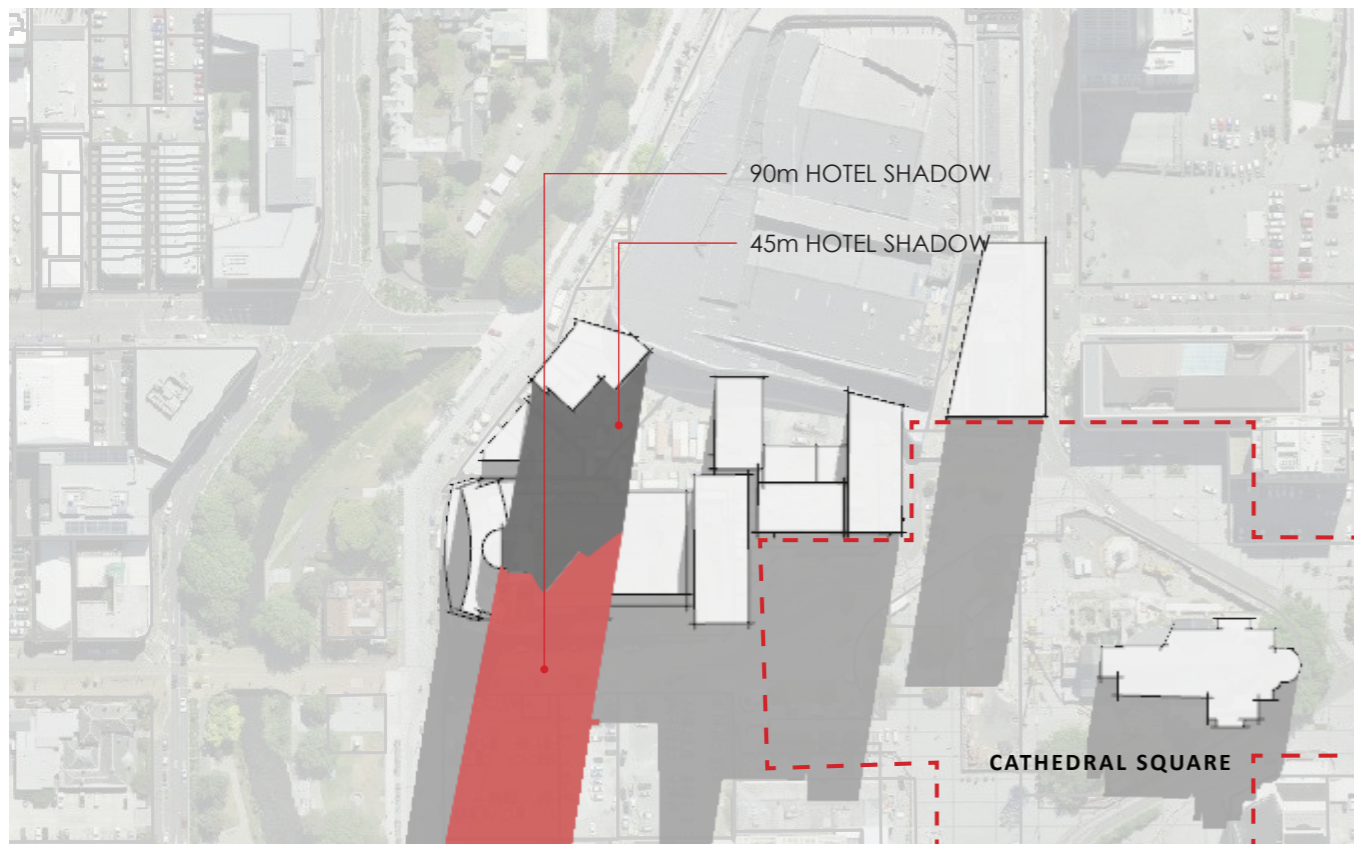
PC14 SUBMISSION - 170-184 OXFORD TERRACE



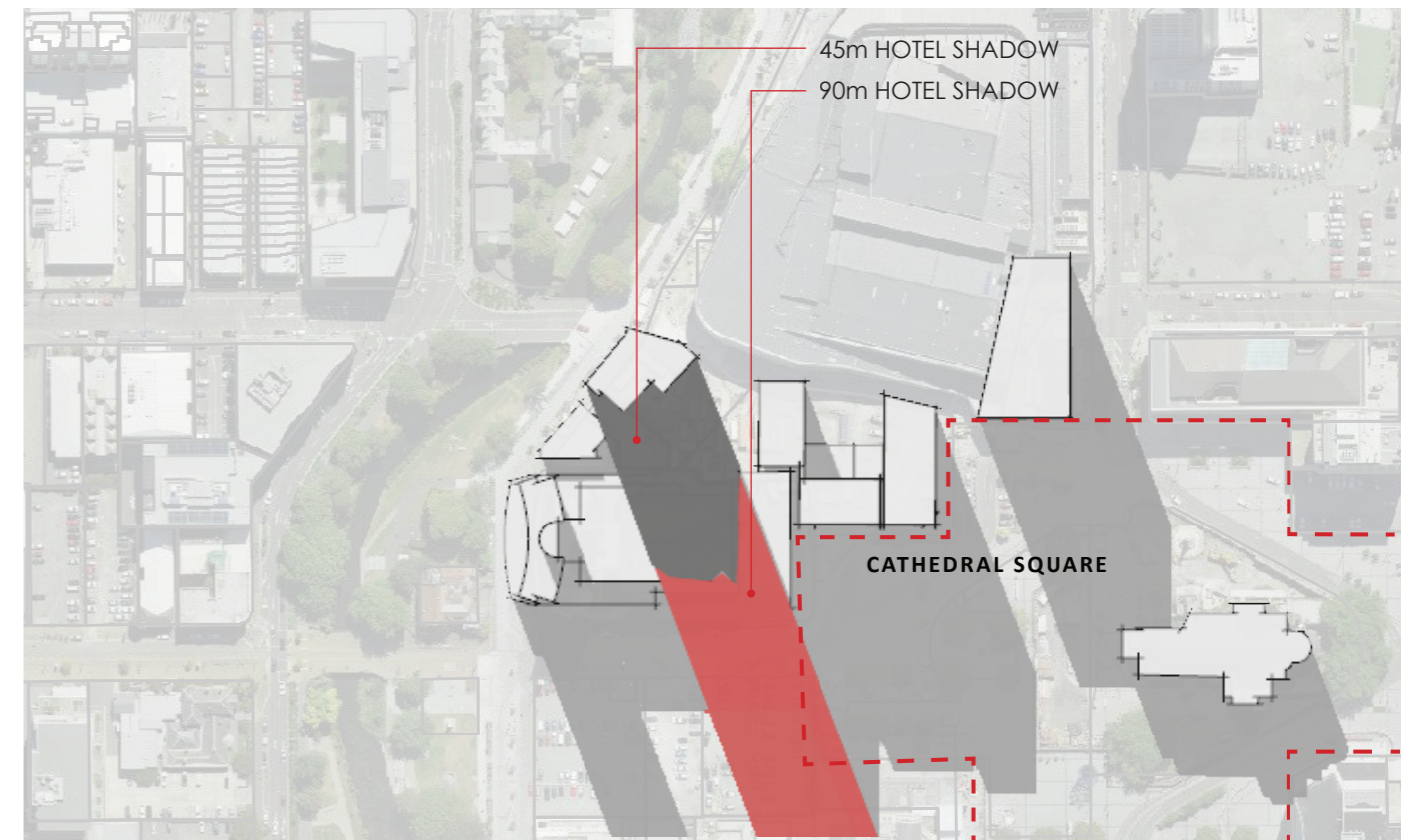
A. 7 AM 21 JUNE



B. 9 AM 21 JUNE

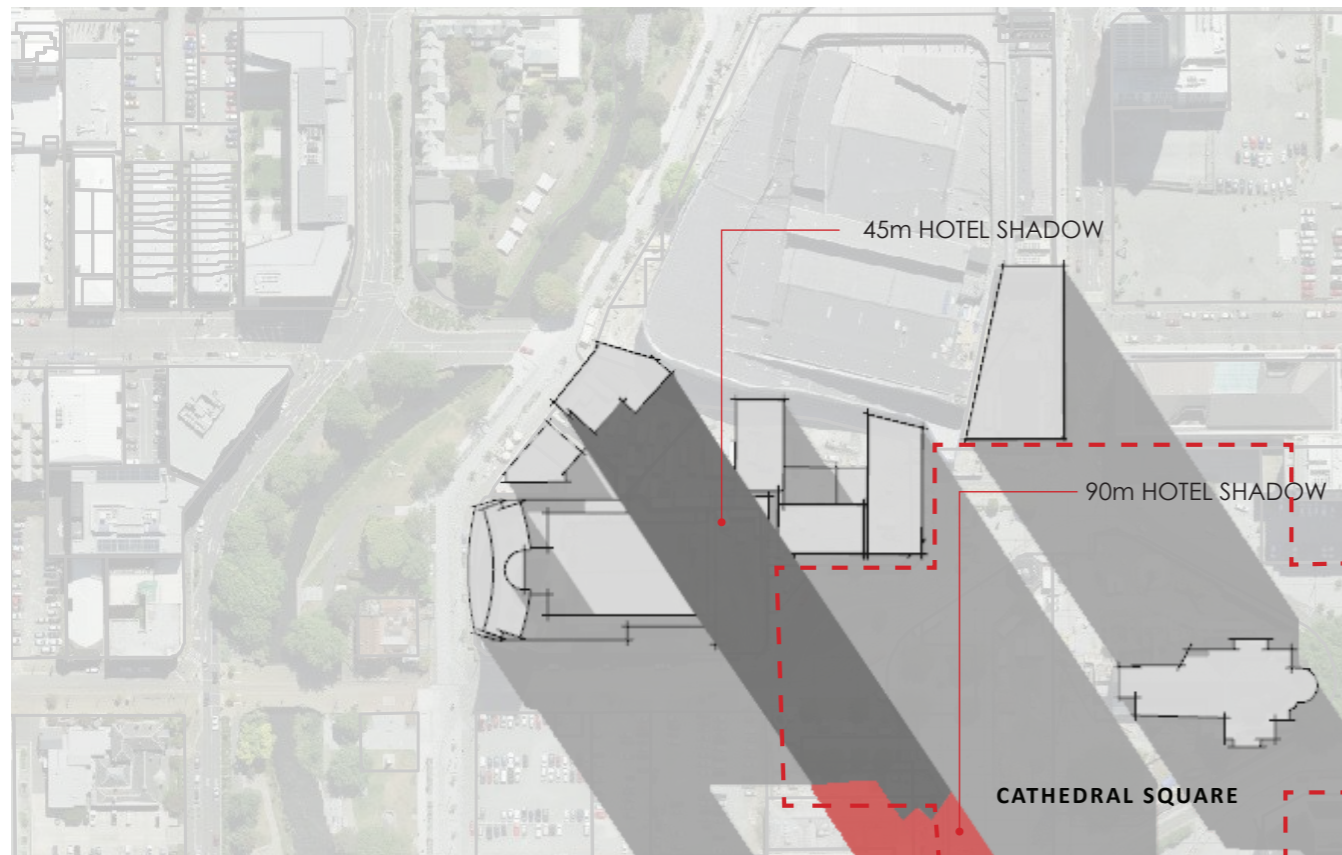


C. 12 PM 21 JUNE

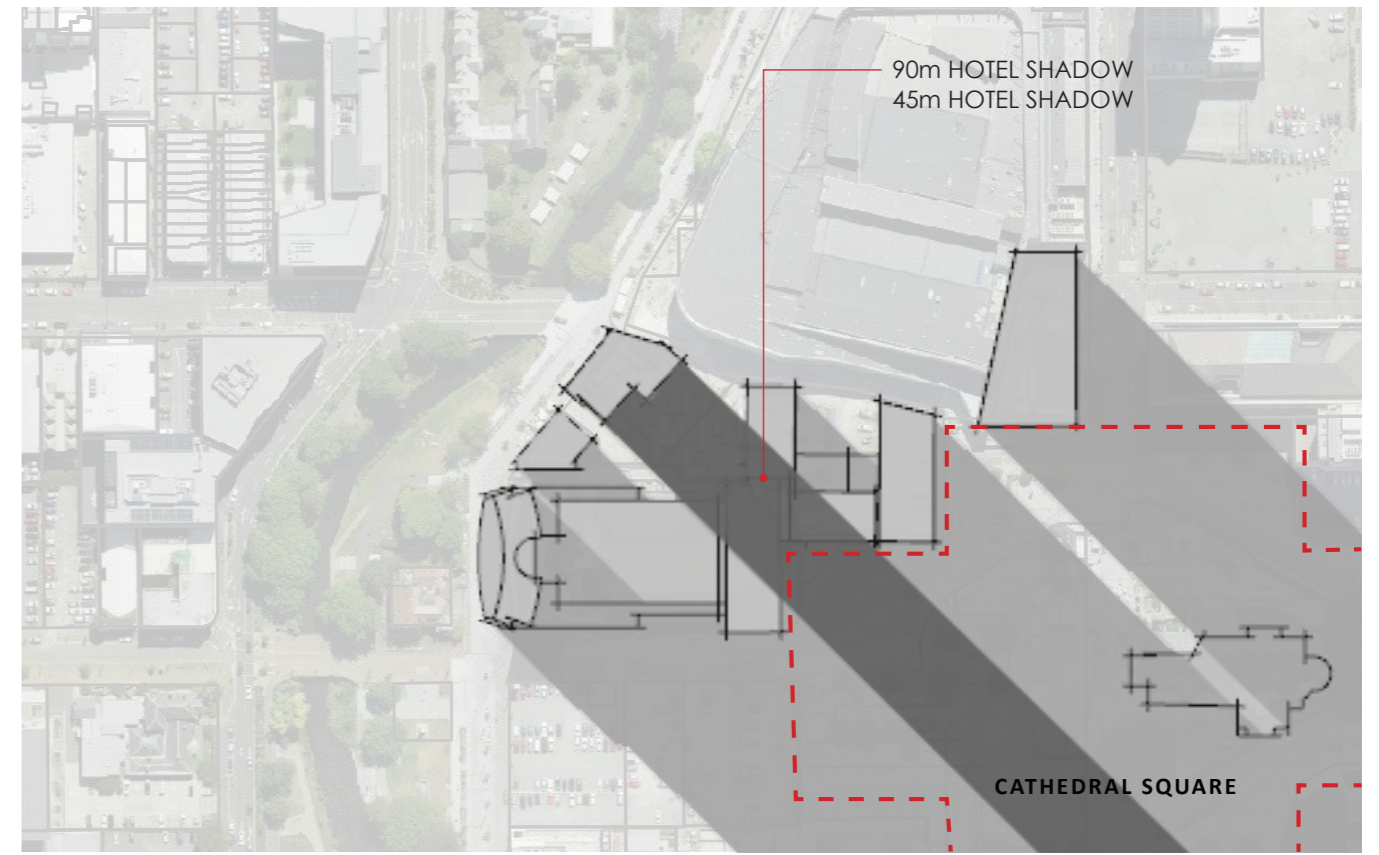


D. 2 PM 21 JUNE

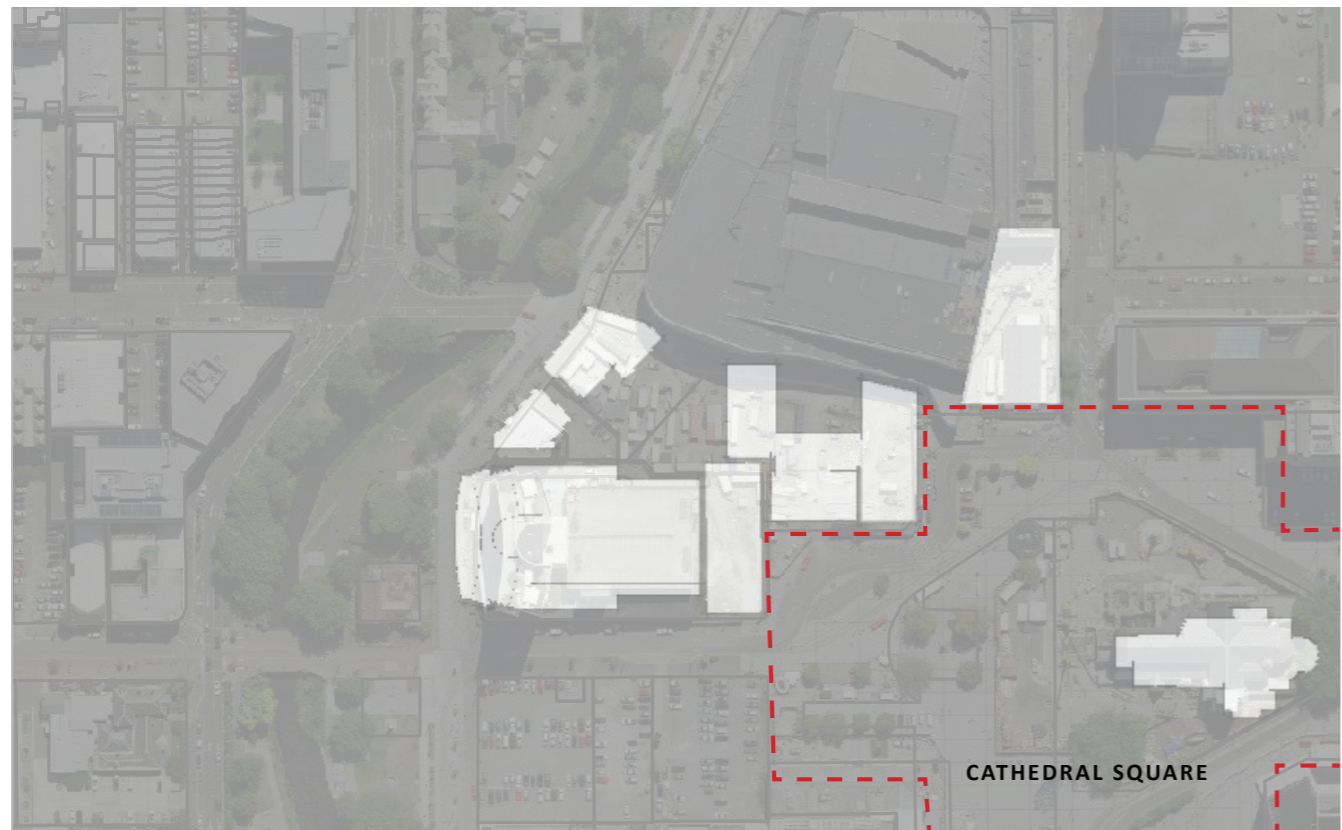




E. 4PM 21ST JUNE



F. 4PM 21ST JUNE



F. 6PM 21ST JUNE

LANDSCAPE AND VISUAL IMPACT ASSESSMENT FIGURES

# ALL HOTELS | SHADOW ANALYSIS WINTER SOLSTICE 21 JUNE

PC14 SUBMISSION - 170-184 OXFORD TERRACE