

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)

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

Dated: 16 November 2023

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SUMMARY STATEMENT OF DAVE COMPTON-MOEN ON BEHALF OF CARTER GROUP LIMITED

INTRODUCTION

- 1 My full name is David John Compton-Moen.
- 2 I provided a statement of evidence in relation to the relief sought by Carter Group Limited (*Carter Group*) on proposed Plan Change 14 to the Christchurch District Plan (*PC14*) dated 20 September 2023 (*Evidence in Chief*). My qualifications, experience and confirmation I will comply with the Code of Conduct for Expert Witnesses (Part 9, Environment Court Practice Note 2023) are set out in my Evidence in Chief and I do not repeat those here.
- 3 This statement is intended to provide a brief summary of my evidence in relation to the Residential Zones hearing topic. This includes updates where relevant in light of the rebuttal evidence filed for Christchurch City Council (*Council*).
- 4 I was involved in the conferencing between Urban design experts held at Christchurch City Council on 5th October 2023.

32 ARMAGH STREET

- 5 This site has a proposed 11m height limit which has been reduced from 14m under the current District Plan. This site was not discussed during conferencing as it was considered a heritage Qualifying Matter by CCC. However, it was generally agreed by experts that urban design issues would not restrict a higher height control limit in this location, given its proximity to amenities and the city centre. Providing a 32m height limit to the site would make it consistent with all other sites fronting Cramner Square and would not be considered site specific.
- 6 The site previously 'housed' the old Christchurch Girl's School Building, and along with other buildings provided a heritage feel to the area. However, many of these buildings have been demolished with the character of the receiving environment being very much eclectic. Building height, building setback, age, use and design all vary greatly with no visual coherence or underlying characteristics discernible.
- 7 I consider the following statement in Ms Dixon's Rebuttal evidence highlights the inconsistency of how this site has '[Para 47] *No provision has been made for RHA built form standards within HRZ zoning because HRZ zoning has not been considered appropriate for heritage areas, since it would likely promote redevelopment of a scale which is likely to hasten loss of heritage values.*' The land immediately to the east of the site is zoned HRZ as are the majority of sites around Cranmer Square which are part of the same receiving environment. I do not consider that the MRZ is an

appropriate zoning for this area or block, with a HRZ zoning more appropriate to promote inner city living in an area which is well-served by nearby amenities. I 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.

RESIDENTIAL PROVISIONS

- 8 I agree with the majority of the rules and provisions proposed for the HDR zone in the central city, except for the following provision which will result in a reduction in housing supply without any tangible benefits to residential amenity.
- 9 In the High-Density Residential zone, Rule 14.6.2.18 Maximum Building Length restricts buildings to 30m in an elevation but does not take into account buildings stepping back or having a degree of modulation in a façade. There are numerous examples where a continuous building length of over 30m is implemented without creating an adverse effect on the streetscape, for example the recently constructed Cramner Terraces with a continuous building length of just over 70m along 2 frontages.
- 10 Multi-unit developments for four or more units require Resource Consent where building length is viewed holistically as opposed to creating an arbitrary length.

Dave Compton-Moen

16 November 2023