

PC14 Presentation to Independent Hearings Panel: Tuesday 14 November 2003 Marjorie Manthei (#237)

Good afternoon. My name is Marjorie Manthei. I've lived on Gracefield Avenue, six blocks north of the Square, for over 30 years. I previously lived in three different suburbs.

VNA Addendum

- 1) I am the Membership and Consultation Coordinator for the Victoria Neighbourhood Association, but this is my own submission. However, I was asked to provide responses to questions put to Geoff Banks last week about the Association. I've done that on the 2-page Addendum and want to emphasise one point. Also adding that VNA has the largest membership of the seven Central City residents' groups.
- 2) The area looks small on the stylised map, but is very densely populated. We're packed in, mainly because of small sections and infilling, especially since the EQ Recovery Plan required new builds of at least one dwelling for every 200m². The smallest sections with one dwelling are 100m² to 232m²; the largest, 421m² to 594m². Sections with multiple dwellings are relatively small too, e.g., 1056m², with 7 townhouses (150m² each) and 1357m² with 6 dwellings (225m²). Most of the sections in the neighbourhood are between 300 – 500m². I've shown examples on the photo page of the Addendum.
- 3) I've included the above as examples of the impact of the 200m² rule and intensification in general, e.g., proliferation of unhosted Airbnb-type rentals; other small apartments with high tenant turnover; increased vandalism, mail theft and other petty crime; fewer families; less commitment to and involvement with the neighbourhood. This is particularly evident on my street because re-development was later than on other streets. The effects should not be surprising, however, given how well documented the impact of high-density developments is. Negative effects are even more pronounced in taller residential builds.

Introduction to my presentation

I was travelling overseas from May to October, so did not make or respond to Further Submissions and did not read all of the s42 reports. However, I re-read my submission in light of CCC's witness statements and some presentations and think it holds up well. There are some points I want to clarify or amend, though.

Topic 1: “Central City”

- 1) Some experts and lay submitters describe the Central City in interchangeable or undefined terms:

The blanket “central city”, without any definition

CBD—sometimes as if this is the entire Central City

City Centre or City Core

Inner City

Four Avenues

- 2) Many submitters suggested intensification should be limited to the “central city”. I know from talking with some of them that they were thinking of the CBD, vaguely picturing it “going north as far as the Town Hall”. This sloppy or uninformed terminology is a shortcoming that could lead to poor decisions.
- 3) I live in the Central City—but definitely not in the CBD and, not even within a walkable catchment from the City Centre. Some of my neighbours now say they live in a “central city suburb” to emphasise this is Residential and should be treated as such.

Topic 2: Walkable Catchment: the most crucial issue, so will spend time on this

- 1) I hold a doctorate degree in Community Development and remember the “20 minute” concept. It related to research about the time (not distance) people across many countries commuted from home to work. Twenty minutes by foot, bike, donkey, plane, car, bus.....
- 2) I then heard about the “20 Minute City”, used by community developers and planners to describe the optimum time (not distance) from home to regularly used services:
 - (i) 20 minutes round trip from home to regularly used services, with a variation of 15 minutes one way. PC14 chose to use the less common 20 minutes one way. I’ve never seen references to more than 20 minutes (see attached summary and excerpts from s32 report), except in some PC14 documents. *See written submission, paras 4.1 – 4.10;*
 - (ii) “Services” include shops, supermarkets, banks, recreation facilities, restaurants etc (see para 4.5 of written submission for quote from Understanding and Implementing NPS-UD);
 - (iii) Larger supermarkets often used as a proxy for services in general, with the expectation that one is within 400m;
 - (iv) The standard practice is to focus on time, not distance, so factoring in Christchurch’s flat terrain makes little sense;

The “*Implementing NPS-UD*” document uses 20-minutes round trip (para 5.5.2), but PC14 stretched both the time and distance in their recommendations: 30 minutes and 1200 to 1800m. My submission provided examples from several neighbours who walked from their home to what they consider “services”, showing we are not within a walkable catchment.

- 3) Last week, I walked from Gracefield Ave to the closest major supermarket, Durham St New World. I’m a fast walker, so I forced myself to slow down a tad and obey red lights. I still overtook several others.
 - It took 25 minutes to get there.
 - After shopping, I saw the bus disappearing, so walked to the Bus Exchange (7 minutes), with groceries in backpack and a carry bag.
 - Waited 28 minutes for next bus, had an 8-minute ride and 4-minute walk back to the starting point.

Total = 72 minutes round trip, by foot and public transport

- 4) The distance by foot is 1.8km, longer by vehicle because of one-way streets (confirmed by the google.com calculator). This is well over the 400m anticipated distance for supermarkets, the 400 – 800m convention for walkable catchments and even PC14’s 1200m.
- 5) **North of Salisbury Street should not be included in the walkable catchment because:**
- (i) The point from which the walkable catchment is measured is the “City Centre edge”, but that’s not where the variety of services are. The Density Enabler Scores are highest to the south of the city centre and relatively low to the north (*paras 4.4 – 4.6 in written submission*); **Summary from Jac Chester’s s32 report, 19/7/22, attached**
 - (i) Services, including a supermarket, are much further than 400 - 800m (min 1.4 - 1.8km);
 - (ii) The Town Hall, this hotel, some cafes/restaurants, Cathedral Square and even Victoria Square do not constitute the variety of services in a 20 Minute City;
 - (iii) It takes longer than 20 minutes to walk to services; public transport can extend this.
- 6) **Why this is so important:**
- (i) The “20 Minute City” and “walkable catchment” are referred to in PC14 documents as *“the primary focus for deciding where greater residential intensification should be enabled”* (e.g., para 3.1.3, s32 report re Accessibility and QMs).
 - (ii) The residential area north of Salisbury Street is within the High Density Residential Zone mainly because of the above, the point at which the walkable catchment is measured and extending the distance beyond accepted conventions.
 - (iii) Therefore, heights incompatible with an already densely built residential neighbourhood are being recommended—without even the protection afforded by residential recession planes and set-backs.
 - (iv) Because this area is so clearly out of range, my only conclusion is that it’s been included simply because it’s “tidy” to cover the Four Avenues. Planners and/or expert witnesses seem to have decided to so that as much as possible, but with no clear rationale provided.

References included in my written statement.

Topic 3: Sunlight and recession planes

- 1) Panellist Ian Munro asked CCC witness David Hattam (2/11/23) if requiring X hrs sunlight/day on all properties, even in HDRZ, made more sense than recession plane and height limits. I lack expertise to comment, other than to say the outcome of any rule/s needs to be (i) adequate sunlight (ii) privacy and (iii) sound urban design principles. These three aspects often are incompatible with increased height.
- 2) I agree with Mr Munro's comment that "if sunlight is important, then it's important everywhere". However, an email to me from CCC Planner Brittany Ratka (17/4/23), stated that "*the more lenient height in relation to boundary controls in HDRZ are unaffected by the sunlight access Qualifying Matter*". Although some controls are recommended (e.g., building separation and recesses at upper levels), I doubt that these would provide the protection that appropriate recession planes and set-backs would.
- 3) Recession planes take into account the impact on neighbours, which boundary is most affected, north-south / east-west sunlight considerations and so on. In my neighbourhood, protection is even more important because of small sections and close proximity of dwellings (*see VNA Addendum*).
- 4) By using current recession planes, even a three-storey dwelling on a very small section is possible, as shown below.



Use of exaggerated recession plane to allow 3-storey townhouse on an infill section of 148m² (49A Gracefield Avenue)

- 5) For me, recession planes, set-backs and height are even more crucial because the vacant section where the Women's Hospital was is on my northern boundary (no buffer between). We know the impact of even the previous 5-storey building on our sunlight (*see paras 7.1 – 7.9 in submission, including the mediated agreement made with the CDHB in 2015*).

Topic 4: Height

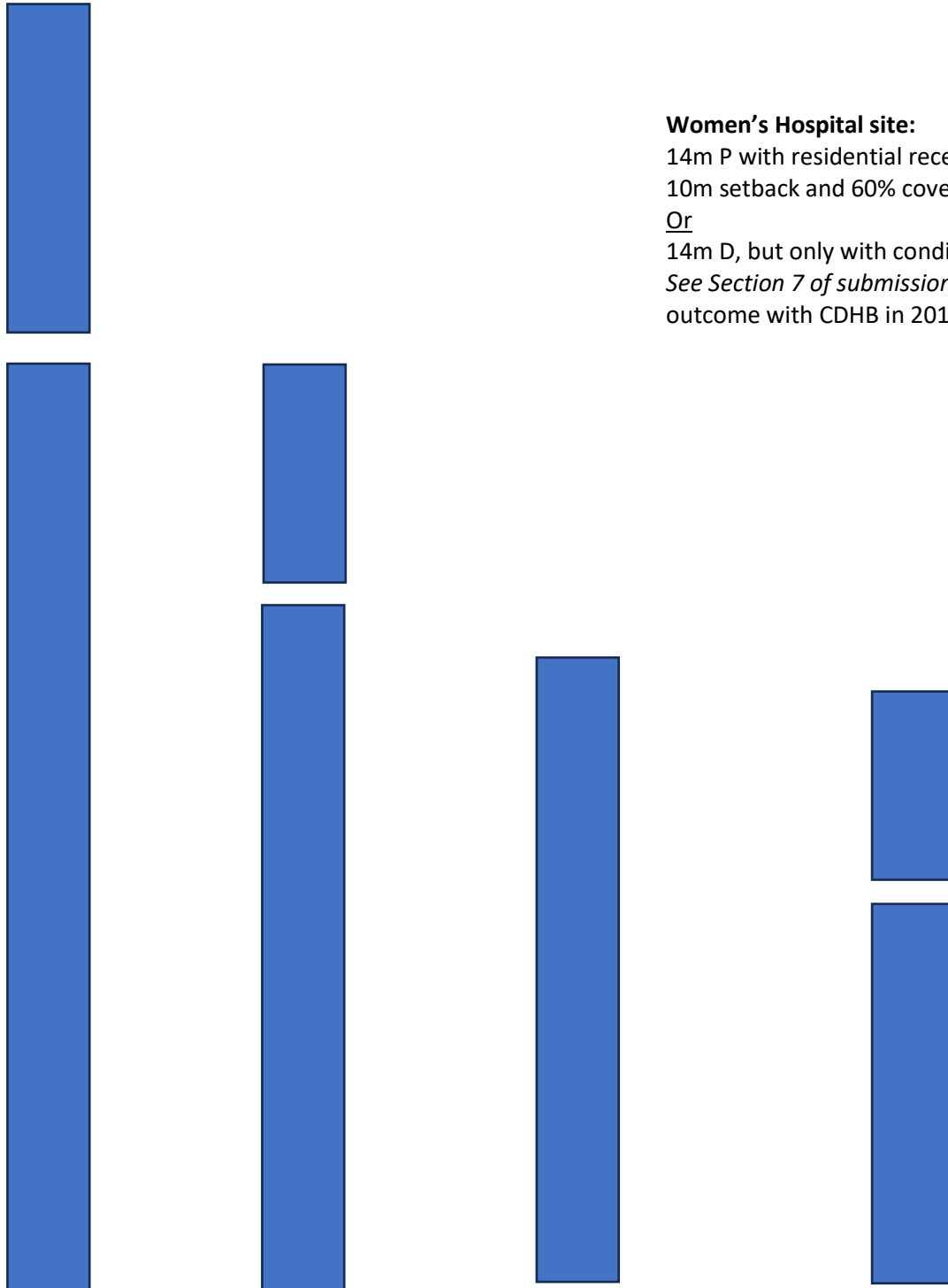
My height recommendations, which maintain the Cascading principle, are a bit hard to follow in my submission. I've produced a diagram below, roughly to scale. I've made some changes in light of reading/listening to other presentations.

**City Centre north
to Kilmore:
45m P, 60m D
(Commercial)**

**Kilmore to
Salisbury:
32m P, 45m D**

**Victoria St
(Salisbury to Bealey)
28m maximum**

**Salisbury to Bealey
(Residential)
14m P, 20m RD
with current recession planes
and set backs**



Women's Hospital site:
14m P with residential recession plane,
10m setback and 60% coverage Permitted
Or
14m D, but only with conditions above
*See Section 7 of submission re mediated
outcome with CDHB in 2015*

Topic 5: Former Women's Hospital site

For this section, I referred to the s32 report by William Field (dated 10/3/23), the s42 report by Clair Piper (dated 11/8/23) and the relevant rules in chapter 13.5 Special Purpose (Hospital) Zone document (published 1/3/23).

- 1) If I'm interpreting CCC's March 2023 recommendations correctly, this site would now be classified as "smaller inner urban site". I think that means rules such as continuous building length would be more lenient than for other sites, and only at height of 14 – 20m.
- 2) Policy 13.5.2.1.2 includes recognition *"that the former Christchurch Women's Hospital....adjoin the High Density Residential Zone"* and *"the form and scale of buildings....recognises the anticipated residential scale and form at hospital site boundaries of the site"*. However, the clause related to this specific site about *"amenity values, safety, character and coherence of the surrounding area at the site boundary and street interfaces"* has been removed. This is unacceptable, given that the site is located through the middle of the street, with residential properties on both the northern and southern boundaries.
- 3) The allowed (i) RD height of 32m at 10m from boundaries (ii) recession plane above 14m if the setback of 10m and (iii) 4m setback at 14m and (iv) greater protection for properties on the site's northern boundary than the southern boundary are all inadequate to ensure an acceptable level of sunlight on the nearby residential properties.
- 4) Problems created along the entire northern boundary of Gracefield Avenue if protections against loss of sunlight are not in place, are covered in my submission. I'm mentioning it here so it's not overlooked.
- 5) I support 13.5.2.1.3, that if the site is no longer needed for hospital/medical purposes, it should be residential. But only if an acceptable residential recession plane, setback and height (as requested in my submission and the VNA's) are accepted. I definitely do not support Mixed Use or Commercial use.

See section 7 of my submission, including photos of the site and outcome of the mediated agreement with the CDHB in 2015.

Topic 6: Doing more than required

The first part of my submission covered five ways that I think PC14 goes further than required by legislation (Part 1, pages 1 – 6). These are the basis of the specific policies, rules and conclusions that I either supported, opposed or requested amendments to in my submission.

The five issues I identified are:

- 1 **The U-turn** between 2019 and now, including the “no vote” in 2022. We now have a version that goes well beyond what is required in terms of height and walkable catchments in particular, despite data and analyses that contradict the assumptions on which PC14 is based (*see 1.1 – 1.5 in submission*).
- 2 **“Long term”** being defined as 50-years or longer, when only 10 – 30 years is required by the NPS-UD.
- 3 **The duration** of PC14 being set at 10 years in the legislation, but no consideration of this in how significant the recommendations are in the current version.
- 4 **“Walkable catchments”** extended well beyond the accepted conventions and the definition and requirements set out in the *Understanding and Implementing NPS-UD* document (*see 4.1 – 4.10 in submission*).
- 5 **The misinformation and/or misinterpretation** of housing and business capacity, Policy 3 and *Understanding and Implementing NPS-UD* which led to significantly greater recommended heights, within a larger area, than what is required, e.g., “as much as possible” is defined as “taking into account local circumstances and factors—specifically, the level of demand and accessibility” and that it “will ensure a well-functioning urban environment is achieved”. The NPS-UD does not say how high, how dense or exactly where (*see 5.1 – 5.16 in submission*).

Summary

The rationale underpinning the current version of PC14 overstates the level of intensification required by legislation. It also ignores or downplays what “long term” means in this context (30-years max) and the implication of the plan’s 10-year life span. The outcome of these deficiencies includes:

- (i) a greater than required enabled height in the City Centre (90m and more);
- (ii) an expanded walkable catchment (at least 1200 – 1800m) and starting from a point that does not take into account where services are;
- (iii) the associated flow-on effects of unwarranted heights on Victoria Street (45m), the former women’s hospital site (32m) and between 20 – 32m in the HDRZ north of the City Centre.

Google search re the “20 Minute City” concept (April 2023)

Three general definitions, without specific citations:

- **What is the 20-minute city concept?**

These are places where everyone can meet most of their daily needs within a short walk or wheel their home. Our aim is to create places where most of people's daily needs can be met within a **20-minute round trip**.

- **What is the concept of a 20-minute neighbourhood?**

20-minute neighborhoods are places where residents have easy, convenient access to many of the places and services they use daily including grocery stores, restaurants, schools and parks, without relying heavily on a car.

- **What is the 15-minute city rule?**

The concept of the **15-minute city**, popularized by the Franco-Colombian academic Carlos Moreno, aims to make cities more liveable by ensuring that **all essential services** — think schools, medical care and shops — are within the distance of a short walk or bicycle ride. 1/03/2023

Excerpt from article published in *Cities*, Vol 131, Dec 2022, T.M. Logan et al: The x-minute city: Measuring the 10, 15, 20-minute city and an evaluation of its use for sustainable urban design. Note no reference to over 20-minutes, for round trip or one way.

One approach to promoting active transport is the concept of the 10, 15, or 20-minute city/neighbourhood (Capasso Da Silva et al., 2019; McNeil, 2011; Moreno et al., 2021). The concept, where “residents are able to meet most of their needs within a short walk from their homes” is being promoted by the C40 Cities—a global network of cities taking action to confront the climate crisis—as part of their Agenda for a post-pandemic Green and Just Recovery (C40 Cities, 2020) and variations have already been adopted by cities worldwide (Table 1).

The idea is based on chrono-urbanism: that the quality of urban life is inversely proportional to the amount of time invested in transportation, more so through the use of motor vehicles (Moreno et al., 2021). **The first adopter was Portland, Oregon in 2008 with its vision to foster 20-minute neighbourhoods as part of their plan to mitigate climate change (Steuteville, 2008). A related concept, the superblock or car-free spaces was introduced in Barcelona in 2016 and Shanghai introduced the 15-minute community-life circle in the same year (Li et al., 2019; Weng et al., 2019). Two years later, Melbourne, Australia launched its program for 20-minute neighbourhoods - however, in contrast to Portland's 20-minute neighbourhood, Melbourne considers the 20-minutes to be a “return” journey, representing a 10-minute walk from home to a destination (TCPA, 2021).** The concept has been adopted further since 2020 when the Mayor of Paris pledged to turn Paris into a 15-minute city.

Excerpt from *International Journal of Behavioural Nutrition and Physical Activity*, 12 February 2022, Lukar Thornton et al: Operationalising the 20-minute neighbourhood.

Background

Recent rapid growth in urban areas and the desire to create liveable neighbourhoods has brought about a renewed interest in planning for compact cities, with concepts like the 20-minute neighbourhood (20MN) becoming more popular. A 20MN broadly reflects a neighbourhood that allows residents to meet their daily (non-work) needs within a short, non-motorised, trip from home. The 20MN concept underpins the key planning strategy of Australia's second largest city, Melbourne, however the 20MN definition has not been operationalised. This study aimed to develop and operationalise a practical definition of the 20MN and apply this to two Australian state capital cities: Melbourne (Victoria) and Adelaide (South Australia).

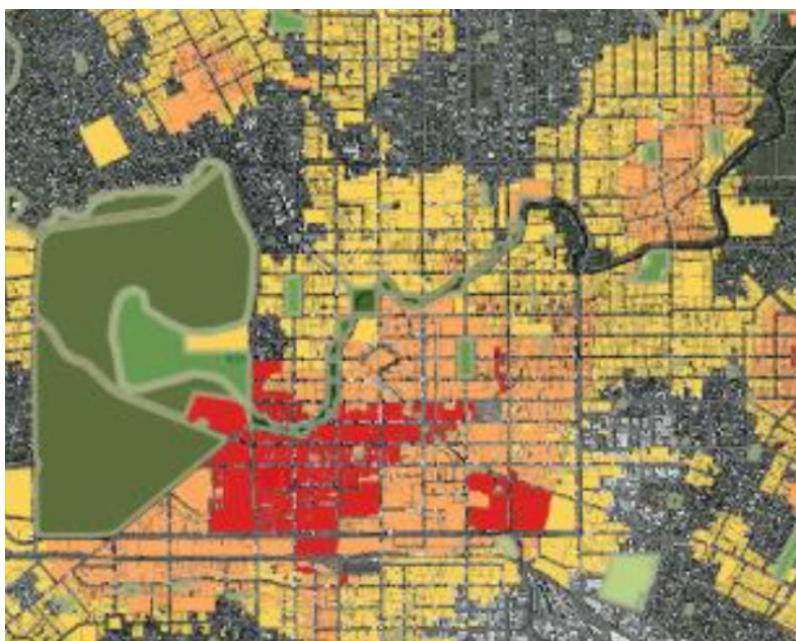
2. Background

2.1.2 Early work in relation to the NPS UD2 resulted in the **development of a Density Enablers Model**. This is a GIS tool that enabled identification of areas that have good access to a range of services and amenities; thereon these areas were to be considered most suitable for intensification given their good accessibility. The model applied a range of enablers and each was given a catchment and a weighting. Once all the catchments and scores were mapped (at individual parcel level), it was evident which land parcels score most highly and are therefore most accessible to a range of services and amenities. The enablers identified comprised commercial centres, core public transport routes (high frequency), major cycleways (MCR's), **supermarket (over 1,000sqm), within 1km of the city centre**, community hub and facilities, significant open space (over 3,000sqm), employment centre, schools and the standard bus network.

2.1.3 **This work emphasised much of the thinking about locations around centres generally offering good accessibility to a range of goods and services.** Overall areas around larger centres score more highly as they had better accessibility to a wider range of goods and services e.g. larger shopping centres, more frequent public transport services and more employment opportunities.

2.1.4 A determination of what is 'good accessibility' in terms of the scores outputted by the model obviously requires some subjectivity i.e how high a score should be considered 'good'? Recognising how nuances in this approach can change the number of areas which are considered as having good accessibility, it is possible to band the accessibility scores and identify which locations have the strongest level of accessibility. The map below identifies those areas with the strongest levels of accessibility (shown in red). Accessibility scoring on this map reduces from red through to orange, then yellow and areas with relatively low accessibility have no shading.

The table below highlights those locations that have the highest scores in the density enabler model. Central City: Areas with the highest accessibility are "around the south of the central city area". from table on p 2



4. Walkable Catchments

4.1.3 The extent of walkable catchments has been much discussed within NZ and overseas. 400m and 800m catchments (equating to approximately 5 or 10 minutes) are commonly used within planning work, and internationally the concept of a 15-minute (Paris) or 20-minute (Melbourne) neighbourhood has been applied. Using a neighbourhood approach **represents the time taken to walk from home to a destination and back again. As such, the 20-minute neighbourhood equates to an 800m catchment.**

This document also refers to the destination within a walkable catchment being where **"the greatest offer of good and services (commercial, community and cultural")** are located (para 5.1.1).



**Additional responses to questions asked after presentation to IHP
Marjorie Manthei (#237) on 14 November 2023**

I answered questions too quickly without seeking clarification because I was aware of the queue of presenters behind me and the late finish time the panel faced. In case the panel is asking others the same questions—for an overview of opinion—I’m now supplying more considered responses.

Question 1: Which is preferable: tall buildings with recesses at the top (to let some sunlight through) or squatter ones that could block some sun on some streets?

My response:

- (i) The question suggests buy-in to the argument that we must enable greater heights than the min 6-storeys required by legislation. But, capacity in Christchurch is not an issue, and there is no rapid transit system in place or even likely within the legislated 10-30 year time period. So, why are these two scenarios even being considered?
- (ii) I do not want tall buildings, i.e., more than 32m (8 storeys) in the CBD—similar to the 28m max now. But, I fell into the same trap and recommended max 45m Permitted / 60m Discretionary, north to Kilmore Street. Even that is too tall, especially with the benefits of “low-rise” builds described by Andrew Willis and Alistair Ray in their evidence. Buildings the height of the Crowne Plaza (71m) cause significant wind tunnels, especially with the relatively narrow streets and footpaths compared with high-rise cities such as Chicago. They also loom over us and go against the overwhelming support for low-rise since the EQs.
- (iii) I should have asked “how squat is squat” and “how would the panel and/or CCC planners ensure loss of sunlight would only be on some streets”? And if they could, which streets and how many? However, if “squat” is less than 45m, then I prefer that over the taller building scenario., although the above questions are still relevant.

Question 2: When walking up Durham St to the supermarket, what did I notice about ‘accessibility’?

My response:

- (i) I misinterpreted this, assuming it related to “accessible” footpaths etc for people with mobility or other issues. I now think it related to “accessible services”.
- (ii) There is no “collection of services” (required under “20-Minute City” and walkable catchment) between my departure point—Gracefield Avenue/Durham Street—and Cashel Mall, the nearest services mecca (banks/ATMs, pharmacy, dry cleaners, full post office services, variety of retail shops).
- (iii) There is more info re this in my full submission of 2 May 2023.
- (iv) Also note that my departure point for trip to supermarket was Gracefield Ave/Durham St, the approximate mid-point of the HDRZ north of Salisbury St. From further south (Peacock/Montreal St), it is much further to “services” (1.6km or 22 minutes minimum) and the supermarket (2.1km or 30 minutes minimum).
- (v) The Density Enabler Scores support the above and the conclusion that Salisbury St to Bealey Ave should not be considered within the walkable catchment.