

1. My name is TERRY SISSONS. I live at 121 Merivale Lane with my partner Hilary Scandrett.
2. Our home is situated on a north facing rear section with an established garden adjoining the grounds of All Souls Church. The entrance to our driveway from Merivale Lane is directly opposite the entrance to Selwyn House School, which is about 100m or so from Papanui Road. We also have pedestrian access to Church Lane via the All Souls car park.
3. In March this year we received a pamphlet from the Council describing the principal features of Proposed Plan Change 14. I went to the Council's website and maps which showed that the zoning of our and neighbouring properties is to be changed from medium density to high density and that we could have high rise apartment buildings springing up in our neighbourhood.
4. I noted that a qualifying matter under sunlight access applied to all residential zones but that the sunlight access QM did not apply to buildings over 12m if sited not less than 8m from a residential boundary.
5. In May 2023 I lodged a consultation document in which I sought the following decisions from the Council:
 - (i) limit the high-density zones to the central city area and provide for medium density zones around the suburban shopping centres;
 - (ii) provide for three level dwellings as of right in medium density residential zones instead of the proposed four levels;
 - (iii) require independent Geotech advice as a precondition to any development over 10 metres; and
 - (iv) delete the waiver of the QM re sunlight access for buildings over 12 metres.

High density zoning

6. In relation to the first decision sought, I share the concerns of several submitters you have already heard from that high density residential zones are not needed in suburban areas to meet the city's medium to long term (10 to 30 years) housing needs. The projected population growth of about 50,000

between now and 2048 (389,200 to 448,000)¹ should not require 40,000 additional homes, as advised in the Council's consultation document. According to the Council's Long-Term Plan, on average, there are 2.5 people per household, which suggests that only 20,000 additional dwellings will be required. Whatever is the correct number of new houses there is no need for high rise apartments throughout the suburbs to meet that need.

7. As counsel for the CCC said in his opening submissions, as a result of the forward-looking overhaul of the operative plan in 2013-17, the operative plan now includes sufficient capacity for future growth and in fact "*we have more than sufficient development capacity*". In his view, which I share, intensity done well would provide for high rise in the central city with lower building heights in the suburbs. The priority should be focused on completing the revitalisation of the central city.
8. According to the Council's latest annual plan, by 2051, 24% of the population are expected to be over the age of 65 years and 10% of the population are expected to be over 80. This cohort is unlikely to be attracted to living in high-rise apartment blocks.
9. Quite apart from these general propositions, I am very concerned about the prospect of high-rise development in the section of Merivale Lane which runs between Papanui Road and Winchester Street. Although the area is close to main bus routes to and from the city centre and within walking distance (for most people) of the Merivale shopping centre, this section of the neighbourhood is quite unsuitable for high rise development.
10. This part of Merivale Lane is narrow – 5m from the north side curb to the edge of the south side car parks. There are three schools in this comparatively short section of roadway: Selwyn House Pre-School; Selwyn House Primary School; and Ferndale Special Education School. There is no footpath along the north side of the street and, apart from a short section near Winchester St, where there is room for up to six cars to park, there is no parking available on the north side with yellow no stopping lines painted on the road surface. There is a footpath and carparking along the south side of the street, which is the side the schools are on.

¹ Refer CCC long term plan.

11. At school drop-off and pick-up times, the street becomes very congested with traffic. Drivers routinely ignore the no stopping lines and block residents' driveways – refer photos taken last Friday. We have complained to the schools and Council about the inconvenience and the inability of emergency vehicles to get through if needed, but nothing has happened.
12. This congestion would be exacerbated by the additional traffic that one or more high-rise apartment building would generate. One can also imagine the problems that would be caused by concrete trucks, delivery trucks, cranes and tradesmen's vehicles jamming the road during the multi-year construction phase. We experienced this during the construction of the 18-unit development close to Papanui Road (previously two dwellings). As an aside, note how close the units are to the road precluding any prospect of road widening.
13. As an alternative to reverting to medium density zoning for this area, I would ask the IHP to consider recommending that the council make the relevant building height and density requirements less enabling of development in this area pursuant to s771 (j) on the basis that the matters I have described make higher density inappropriate.
14. I appreciate that this would involve the council carrying out an evaluation to comply with s77L, including identifying the specific characteristics that make the level of development provided for inappropriate. I suggest as a starting point that such specific characteristics include the combination of a narrow street with limited parking, serving residents and several schools, with resulting traffic congestion, and no scope for absorbing the additional traffic or parking burden that would inevitably result from high rise apartment buildings, during construction and following completion.

Medium density zoning

15. In relation to point (ii), the NPS-UD contemplates three-level dwellings in MDRZs which is what I say the Council should adopt instead of four levels. Given the city's existing planned capacity for growth there can be no justification for exceeding the government's directive.

Need for Geotech advice

16. I do not pursue point (iii) as it probably falls under building code compliance rather than urban planning. Nevertheless, while I cannot claim any expertise, I understand that much of the land within the proposed HDRZs is not suitable for intensive high-rise development and the issues relating to TC2 and TC3 land are well known. Following the 2010/11 earthquakes the city limited most redevelopment to low rise buildings, which became the norm for residential and commercial/office development in the city.
17. Julia van Essen (an RBK Residents Association witness) summarised the issue well in my opinion. You also heard Mr Taylor's evidence about one of his neighbour's having to spend \$750,000.00 on special 20-metre-deep foundations for a two-level development and another neighbour being unable to reach solid ground at a depth of 20 metres.
18. The risk of earthquake has not gone away and must surely be kept in mind when considering the implementation of the proposed changes.

Waiver of QM re sunlight

19. In relation to (iv), I agree in principle with the Council's sunlight access proposals but cannot understand why the proposed QM re sunlight protection should not apply to buildings over 12m if set back 8m from the boundary. I stand to be corrected but it seems to me that a building that is 24 -30 m high will have an impact on the neighbour's access to sunlight and should not be allowed in existing/established residential areas.

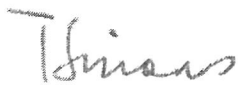
Additional related matter

20. If I may be permitted to address a matter related to my first point but not specifically included in my original submission, I would like to question whether NPS-UD Policy 3 has been correctly applied and whether policy (c) applies to the area near Merivale Lane between Papanui Road and Winchester Street (our immediate neighbourhood). That area is not within (a) a city centre zone, nor (b) a metropolitan centre zone and (c) is not within a walkable catchment of (i) an existing or planned rapid transit stop (there are none existing or planned), or (ii) the edge of a city centre zone, if you consider the edge of the Christchurch city centre zone to be at about Victoria Square. The distance from the Kilmore St/Victoria intersection to the eastern end of Merivale Lane is 1.4 km).

21. It appears that the Council has applied the concept of “walkable catchment” to any commercial centre rather than the edge of the city centre zone. In the case of Merivale (classified as a large local centre) the Council recommends 400m as a walkable catchment. That is a reasonable distance, but I question whether policy (c) applies to a walkable catchment of a local centre zone.
22. It seems to me that policy (d) applies to our area as it is reasonably adjacent to Merivale shopping centre, which is classified as a local centre zone (or equivalent). Therefore, according to (d) building heights and density of urban form need to be commensurate with the level of commercial activity and community services.
23. The commercial activity in and around Merivale centre includes a medium sized shopping mall, containing a supermarket, retail shops, and a few offices. Adjacent to the mall and across the road are some small shopping arcades, retail stores, bars, restaurants and cafes, with some offices. Community services include two churches (and an attached community centre), three secondary schools (in the vicinity of rather than adjacent to the shopping centre), two primary schools, a pre-school and a special education school. In my opinion this level of commercial activity and community services is commensurate with medium building heights and medium density of urban form.

Conclusion

24. Thank you for giving me this opportunity to speak and for listening to my concerns.



Terry Sissons

