

APPENDIX 2

TE RUNANGA O NGĀI TAHU

COMMENTS ON THE DRAFT CENTRAL CITY PLAN (Volumes 1 and 2)

TO: Central City Plan Comments
Christchurch City Council
PO Box 73001
Christchurch

NAME: TE RUNANGA O NGĀI TAHU
PO Box 13-046
Christchurch

TE RUNANGA O NGĀI TAHU **do wish to be heard** at the public hearings in respect to the Central City Plan (CCP).

BACKGROUND AND CONTEXT

TE RUNANGA O NGĀI TAHU'S property company, Ngāi Tahu Property Limited, (Ngāi Tahu) is a major owner, investor and developer within the Christchurch property market.

Ngai Tahu's current central city property profile involves:

- The Civic Building – Christchurch City Council Offices
- 93 Cambridge Terrace office building – King Edward Barracks site (KEB)
- Car parking and temporary New Zealand Post site – King Edward Barracks site
- The Christchurch Central Police Station and site operations
- The Courts – the High, District, Environment and Family courts

The recent earthquake events have resulted in a significant amount of damage to the majority of these buildings, and unfortunately, in some cases demolition will be required. NGĀI TAHU has reviewed the CCP in order to assess the impacts of the Plan on the redevelopment, rebuilding, and infusion of activity associated with these key central city sites.

Earthquake Recovery and the CCP

NGĀI TAHU note that the CCP is intended to be an earthquake recovery plan. Therefore NGĀI TAHU consider that the Plan should include the components necessary to encourage, assist and guide the redevelopment, rebuilding and reintroduction of activity within the Central City in a way that achieves the outcomes and visions anticipated in Volume 1 of the CCP. Broadly this vision is for a healthy, safe, resilient, sustainable and vibrant Central City.

NGĀI TAHU has assessed the implementation methods, which are proposed in the CCP to achieve the vision and objectives outlined in detail in Volume 1. NGĀI TAHU notes that broadly, these are rebuilding infrastructure, public investment and supporting private investment. To understand the balance between, and importance of each of these implementation methods in the recovery process, the CCP outlines that the private investment (the third implementation method) will account for ten times the value of the public investment (the first implementation method). This balance highlights the importance and scale of private investment required in order to recover and ultimately achieve the Vision of the CCP.

Within this context, NGĀI TAHU considers that the CCP should involve an approach to implementation that focuses on provisions necessary to **facilitate** infusing activity, redevelopment, rebuilding of the central city. The approach taken in the CCP with respect to implementation and private investment is to introduce incentives and regulation.

NGĀI TAHU questions whether the balance between incentive and regulation is appropriate to enable the vision of the CCP to be realised. This relationship in a recovery plan is key. Components that should be involved in a recovery plan to assist the required private investment implementation would include elements such as, a strong emphasis and detail on facilitating public/private partnerships and details on timing relating to infrastructure rebuilds. The focus of the CCP in terms of implementation is on the new regulatory requirements and building design. The following comments are made in respect of the regulatory changes proposed.

Relationship to earthquake recovery

NGĀI TAHU considers that a number of the provisions are unrelated to earthquake recovery in their current form, therefore questions whether it is appropriate to introduce such requirements through this streamlined process.

Significance of the impact on the Central City

Further, NGĀI TAHU notes that the provisions will have a significant impact on development and investment decisions within the City. These new impacts should be considered carefully to analyse whether the processes proposed and outcomes anticipated are going to enable recovery and ultimately the vision outlined in Volume 1 of the CCP to be achieved.

Assessment of provisions and their impact

In terms of the type of provisions proposed and the extent of their impact, NGĀI TAHU questions whether this streamlined process provides for this analysis to be adequately achieved. If there is a risk that the proposed provisions and their associated outcomes may not achieve the Vision, it is NGĀI TAHU's view that this could detrimentally impact on the Central City's recovery.

Proposed hurdles and processes and facilitating recovery

In terms of the process proposed, given that the provisions introduce additional hurdles and considerations, which will result in additional uncertainty, time and cost, NGĀI TAHU is concerned that the proposed processes will dis-incentivise investment and development and consequently hinder the recovery of Central Christchurch. This is the opposite effect to what a recovery plan should have.

Proposed solution to recovery strategy

In a climate where people face risk and uncertainty every day due to the impacts of a natural disaster, risks in terms of facilitating recovery and decisions to remain invested in Christchurch need to be removed as far as possible.

As set out above, NGĀI TAHU questions whether the approach taken to recovery for the central city has aimed to remove this risk, or whether it has increased risk.

With respect to the environmental outcomes that the regulatory framework seeks to achieve, NGĀI TAHU suggests that further analysis of the adequacy of these provisions in a recovery context would be required to ensure that they will achieve the vision for Christchurch's central city. This process does not provide for this analysis. It is however acknowledged that a standard RMA process for such provisions would not be appropriate for these times. The reason for this being that there is need to settle on a planning framework quickly in order to facilitate development in the central city. Given this, a process somewhere between the current approach and a traditional First Schedule Resource Management Act process may be appropriate for new planning provisions that cannot be directly linked to the earthquake recovery strategy and/or will be seen as a disincentive to development.

Specific Comments

In light of these introductory comments, NGĀI TAHU opposes or seeks clarification/amendment to the following elements of the CCP and in some cases seeks that they are removed, along with any related amendments to objectives, policies, reasons, explanations of the Plan, as required.

- ***Conservation 5 Zone – Planning Maps 1 and 3 (Replacing Planning Maps 39 A, B and D)***
- ***Mandatory consent requirement for Urban Design – Rule 2.2.2 (Volume 3, Part 3) p. 49***
- ***Mandatory consent requirement for buildings adjacent to listed heritage items – Rule 1.1.3 (Volume 3, Part 10) p. 185***
- ***Bonus Floor Provisions – proposed Rule 2.3.1 (Volume 3, part 3), p.61***
- ***Requirements and restrictions on minimum and maximum floor heights – Proposed Rule 2.3, 1 (Volume 3, Part 3), p. 61***
- ***Limits on retail floor space – Proposed Rule 2.2.5(2) (Volume 3, Part 3), p. 58***
- ***Requirement to build to the public road/open space boundary - Building Setback - Proposed Rule 2.2.1, 1.1 (Volume 3, Part 3), p. 42***
- ***Restrictions on what activities can be located on ground floor frontage of buildings (Active Frontage) - Proposed Rule 2.2.6 (Volume 3, Part 3), p. 60***
- ***Building interface with Living Zones – Proposed rule 2.2.1 – 1.2 (Volume 3, part 3), p.45***
- ***Recession Planes on Road Boundary – Proposed rule 2.2.1 – 1.1 (Volume 3, part 3), p.45***

- **Continuity of Frontage -Proposed Rule 2.2.1, 1.2 (Volume 3, Part 3), p. 42**
- **Public Open Space Definition (Referred to throughout the CCP)**
- **Heritage sites exemptions from other standards - Rule 1.3.3(4), (Volume 3, part 10) p.187**
- **Cycle parking and associated lockers - Rule 2.5.1, (Volume 3 Part 13)p.144**
- **Requirement to achieve pass rating under Build Green Christchurch Tool – Rule 2.2.3 (Volume 3, Part 3) p. 53**
- **Maximum parking numbers Rule 2.4.1 (Volume 3, Part 13) p.131**
- **Vehicle Access to Parking Locations – Rule 2.4.14, (Volume 3, Part 13)p.141**
- **2.4.3 (c)Parking spaces for people with disabilities – Central City Zones (Volume 2, page 134)**
- **Vehicle Access to Parking Locations - Rule 2.4.14 (Volume 3, Part 13) p. 141 and roading classification – “Way “**
- **Policies relating to Distributions of Commercial Activity and Commercial Centres(Volume 2, Section 12) p. 26-29**

If these provisions proceed through this process, NGĀI TAHU provides comments, suggested amendments, and suggested provisions in the table in **Attachment One** to assist in this process.

NGĀI TAHU also makes comments in the table in **Attachment One** in respect of the following aspects identified in the CCP:

- **Designations (Planning Map 2)**
- **Road network changes (Map, Volume 1 page 86)**
- **Road network change process**
- **Existing use rights (Volume 2, p.3)**

Finally NGĀI TAHU includes some additional suggestions for provisions that could be included in the CCP, on the basis that the current regulatory change approach is taken. These additional suggestions relate to:

- **Implementation/Incentives – public/private partnerships**
- **Street numbers and building identification**
- **Supermarket provision to cater for central city living objectives**

ATTACHMENT ONE

SPECIFIC COMMENTS AND AMENDMENTS

| CCP Provision | Comment Type – Oppose, Amend, Clarify, Include | Specific Comment |
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| <p>Conservation 5 Zone – Planning Maps 1 and 3 (Replacing Planning Maps 39 A, B and D)</p> | <p>Drafting Error/Oppose</p> | <p>NGĀI TAHU notes the new Conservation 5 Zoning extends over their site at the Courts site. NGĀI TAHU is of the view that this is a drafting error and requires amendment on the Planning Maps. This view is supported by the discussion on Volume 2 page 172 where it is stated that all Conservation 5 zoned land is under Council Control. The land in question is owned by Ngāi Tahu.</p> |
| <p>Mandatory consent requirement for Urban Design – Rule 2.2.2 (Volume 3, Part 3) p. 49</p> | <p>Amend</p> | <p>For the reasons set out in this submission, if this provision is to be retained within the Plan the following aspects must be considered by the decision makers and further detail specifically included within the CCP to provide certainty to investors in their own decision making, for example the continuation of the current process involving an independent Urban Design Panel.</p> <p>If after considering these factors the Council are of the view that the implications of this provision are such that they do not relate to earthquake recovery and may act as a disincentive to development, the provisions should be removed.</p> <p>The CCP outlines through standards, reasons and explanations for rules how applications will be processed in respect of the following:</p> <ul style="list-style-type: none"> a) The type and extent of expert assessments required to be supplied with applications (standard) b) The Council assessment of any such expert assessment, including whether or not an in-house or independent urban designer would undertake this assessment (standard) |

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| | | <ul style="list-style-type: none"> c) Confirmation on whether or not an urban design panel would assess the application, and if this is in addition to, or instead of the in-house/independent urban designer mentioned above (standard) d) If an urban design panel is involved, clarification of the weight of their assessment in a resource management context and the extent to which they can require alterations to the design (standard) e) The timeframes for processing such consents (standard) f) The relationship of this assessment process to the intention indicated in Volume 1 page 131 of the CCP to streamline consent processing (reason for rules) g) That in respect of application processing costs, this should be cost neutral to the applicant (standard). |
| <p>Mandatory consent requirement for buildings adjacent to listed heritage items – Rule 1.1.3 (Volume 3, Part 10) p. 185.</p> | <p>Amend</p> | <p>NGĀI TAHU notes the assessment matter applicable to this resource consent requirement:</p> <p><i>(q) Within the Central City, for new buildings on a site adjoining a site which contains a listed heritage item, whether the proposed building’s siting, design, scale, proportions, and form is compatible with the heritage values of the listed item and would not detract from the setting of the listed item or reduce the visibility of the item from any road or public place (emphasis added)</i></p> <p>1. Firstly, for the reasons set out above, if this provision is to be retained within the Plan the following aspects must be considered by the decision makers and included specifically included within the CCP to provide certainty to investors in their own decision making.</p> <p>If after considering these factors the Council are of the view that the implications of this provision are such that they do not relate to earthquake recovery and may act as a disincentive to development, the provisions should be removed.</p> <p>The CCP outlines through standards, reasons and explanations for rules how applications will be processed in respect of the following:</p> <ul style="list-style-type: none"> a) The relationship of the consideration in respect of the <u>proposed buildings compatibility</u> |

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| | | <p><u>in siting, design, scale, proportions, form with the heritage item, with the new specific building, bulk, location and design requirements.</u> (standard and explanation in CCP)</p> <p>b) The type and extent of expert assessments required to be supplied with applications (standard)</p> <p>c) The Council assessment of any such expert assessment, including whether or not an in-house or independent heritage expert would undertake this assessment (standard)</p> <p>d) How this assessment will <u>impact on, or relate to the urban design considerations</u> referred to above (explanation in the CCP)</p> <p>e) The timeframes for processing such consents (standard)</p> <p>f) The relationship of this assessment process to the intention indicated in Volume 1 page 131 of the CCP to streamline consent processing (reason for rule).</p> <p>g) That in respect of application processing costs, this should be cost neutral to the applicant (standard).</p> <p>2. In terms of the assessment matter (q) set out above, NGĀI TAHU is of the view that the outcome sought – requiring compatibility of the new building with the heritage item in terms of <u>siting, design, scale, proportions and form</u> is at odds with the new prescriptive building bulk and location requirements and potentially at odds with the urban design outcomes sought in the provision above. This language sets a high threshold for considering heritage values and, even if the consent requirement is retained, NGĀI TAHU opposes the use of this language and suggests that a more appropriate level of consideration of heritage values would be language such as those used in the City Plan at present (Volume 3, Part 10, Assessment Matters 1.4.1:</p> <ul style="list-style-type: none"> • In the case of any additional buildings, <u>whether these would detract from the setting or quality of the listed item, or reduce the visibility of that item from any road or public place (emphasis added)</u> • Whether an alteration, <u>if not in sympathy with the heritage items or form, is clearly distinguishable</u> from the original as new work (emphasis added) |
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| | | <p>3. Thirdly if this standard must be retained, the status of all consent should be controlled not restricted discretionary. The introduction of this standard to consider heritage fabric on <u>adjacent</u> sites is new and higher threshold for considering heritage within the central city as this is now placing the responsibility on landowners who don't own heritage buildings to consider these in the development of their own sites.</p> <p>These owners should not be faced with any uncertainty that their investment decision/development may not be able to proceed (restricted discretionary activity) due to the adjoining sites' heritage item. This uncertainty needs to be removed from the CCP by at the very least changing the activity status of such consent requirements to <u>controlled</u>.</p> <p>4. Ngāi Tahu seeks clarity on whether nearby bridges (as listed heritage items) are intended to be considered as part of this consent requirement, given that some are now zoned Conservation 5 as opposed to Special Purpose Road. It is Ngai Tahu's view that it is not possible to design a commercial building on an adjacent site that is compatible in form, scale, siting and design with a bridge and this should be made clear in the CCP.</p> |
| Bonus Floor Provisions – proposed Rule 2.3.1 (Volume 3, part 3), p.61 | Drafting Error/Clarify | The CCP does not include the standards for which a bonus floor can be achieved in the Fringe (only the core). NGĀI TAHU assume this is a drafting error and that the same standards in this regard will apply to the Fringe as in the Core. |
| Requirements and restrictions on minimum and maximum floor heights – Proposed Rule 2.3, 1 (Volume 3, Part 3), p. 61 | Oppose/Amend/Clarify | <p>1. NGĀI TAHU seeks that the plan defines the measurement points for the 4.5m minimum floor to floor requirement at ground floor level.</p> <p>It is not currently clear in the CCP where the floor to floor measurements should be applied.</p> <p>2. NGĀI TAHU notes that there is a requirement to build a minimum two storeys and have a minimum height of 9m in the Central City fringe. It is considered that this requirement is not practically required or economically possible for certain activities re-establishing or looking to establish back in these areas. In this sense this minimum floor requirement precludes some activities from being able to consider re-establishing back in the central city.</p> |
| Limits on retail floor space – Proposed Rule 2.2.5(2) (Volume 3, Part 3), p. 58 | Oppose | NGĀI TAHU is opposed to this minimum requirement as it discourages a number of retailers from either re-establishing or making a decision to establish within Christchurch's central city. Discouraging this retail activity will not enable recovery, rather, it will hinder recovery and |

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| | | <p>ultimately impact on the CCP’s vision for a vibrant, sustainable and resilient central city.</p> <p>NGĀI TAHU has assessed the reason for this limit and have found that the standard is tied to an aspiration for attracting certain types of retail activities into the central city and keeping certain types out. The CCP doesn’t state this, but it is also interpreted that the CCP is looking for a “boutique” approach to retail activities within the core.</p> <p>The type of retail activity that the rule aims to keep out of the central city is that such as Rebel Sports which is referred to on page 59 (Volume 2) by way of a description of it’s current location. The market alone will dictate whether this type (size) of retail activity is able to establish in the core for a number of reasons including:</p> <ul style="list-style-type: none"> • The availability of a retail tenancy of this size and appearance. • The cost of a tenancy to accommodate this type/size of tenancy given the value of land within the core, compared to the central city south area. <p>It is noted that even if a retail activity such as Rebel Sports , or other pre-existing activities such as Kathmandu, Country Road or Whitcoulls, wished to establish or re-establish within the central city the appearance of the activity from the street would be dictated by the tenancy in which it is occupying. It is possible to have retail activities that are greater than 450m², yet still achieve a small format appearance in terms of the entry as viewed from the street. Such outcomes can be achieved as shown on the attached Plan in Attachment Two.</p> |
| <p>Requirement to build to the public road/open space boundary - Building Setback - Proposed Rule 2.2.1, 1.1 (Volume 3, Part 3), p. 42</p> | <p>Oppose/amend</p> | <p>In some cases compliance with Development Standard 2.2.1 will result in a non-compliance with the 30m setback requirement set by the existing City Plan. The CCP does not account for this contradiction, creating an anomaly and therefore, there is uncertainty for those developing sites as to which standard should prevail.</p> <p>In addition, in some cases the requirements of Development standard 2.2.1 will result in an environmental outcome where a new building is the only building in the block located on the road boundary or adjoining the public open space, with other buildings being setback either uniformly or at varied setbacks. Within this context, NGĀI TAHU considers compliance with the requirement may result in undesirable urban design outcomes. The requirement may also have an impact on the heritage values of any listed items in an existing block. Both aspects are required to be assessed under the CCP as per the discussion above.</p> |

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| | | <p>New standards proposed by the CCP place emphasis on the assessment of urban design and where heritage buildings exist, the assessment of new buildings on the values of the heritage item. By also introducing a requirement to locate buildings on the road boundary of sites or adjoining public space, NGĀI TAHU considers that contradictory environmental outcomes are being proposed by the CCP. This introduces additional uncertainty, time and cost to applicants.</p> <p>NGĀI TAHU considers that such a requirement may not be necessary in the context of other urban design considerations required by the CCP. In any case, the plan should ensure there is sufficient flexibility to accommodate such situations, removing competing objectives.</p> |
| <p>Restrictions on what activities can be located on ground floor frontage of buildings (Active Frontage) - Proposed Rule 2.2.6 (Volume 3, Part 3), p. 60</p> | <p>Oppose</p> | <p>This requirement is limiting. The result of this requirement may be that a significant number of buildings in the Central City are vacant at ground floor level as a result of an inadequate supply of retail operators and other approved uses available to fill the space. Ngāi Tahu is of the view that this would not be a positive outcome for recovery of the Central City.</p> |
| <p>Building interface with Living Zones – Proposed rule 2.2.1 – 1.2 (Volume 3, part 3), p.45</p> | <p>Drafting Error/Oppose</p> | <p>NGĀI TAHU notes that where a site in the central city core or fringe adjoins a living zone boundary, a 3m setback is required. Where the living zone boundary extends over a road to adjoin a central city core or fringed zoned site, this results in a requirement to set the building back from the road boundary by 3m. This is in conflict with the new proposed requirement to build to the street boundary. In any case the road provides adequate separation at the interface of the zones and a specific should not be required for this purpose. NGĀI TAHU considers that this may be a drafting error and that provision should be amended to ensure this requirement only applies at internal boundaries between a living and commercially zoned site.</p> |
| <p>Recession Planes on Road Boundary – Proposed rule 2.2.1 – 1.1 (Volume 3, part 3), p.45</p> | <p>Oppose</p> | <p>NGĀI TAHU is of the view that the new recession plane requirement within the central city will result in design outcomes that may not be reflective of function.</p> <p>NGĀI TAHU questions the intention of the recession plane requirement in the context of shading mitigation, given that the CCP proposes a low rise built form across the city in order to mitigate shading of roads and public spaces. NGĀI TAHU is of the view that the recession plane requirement will create steps in the upper levels of buildings that may be unnecessary. If it is intended that the upper levels include decks, these may not be appropriate along certain road frontages due to</p> |

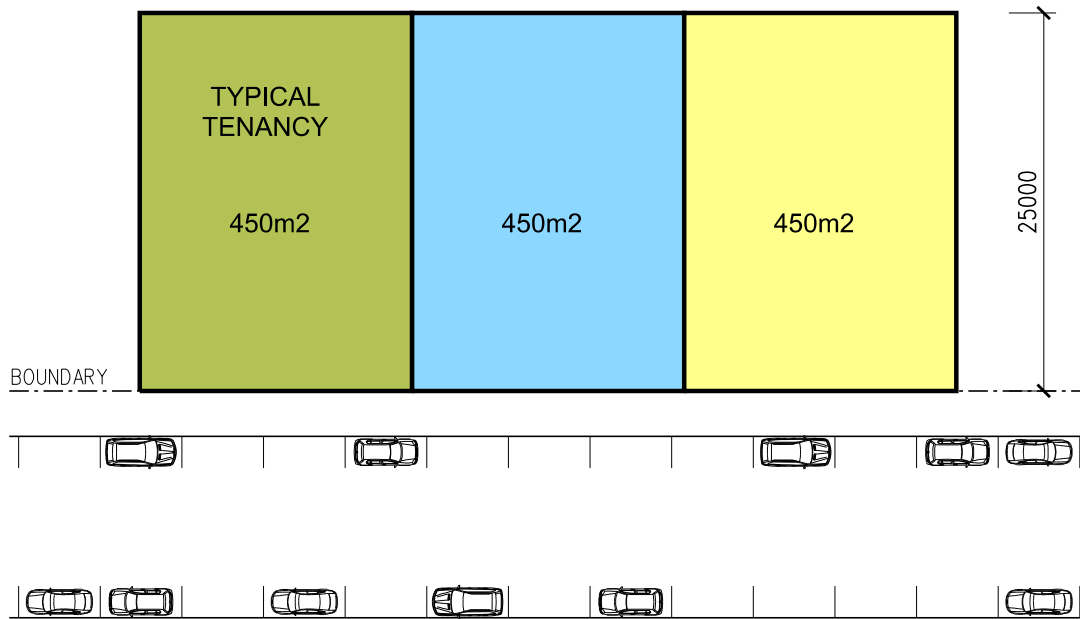
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| | | <p>weather considerations and the usability of these spaces.</p> <p>NGĀI TAHU seeks clarity on the need for this rule in design terms. Within this context it is noted that the current City Plan rule requires a 65 degree recession plane from a point measured 10m into the road from the site boundary.</p> <p>The result of the existing City Plan and proposed CCP recession plane requirements are shown on the plan attached as Attachment Three.</p> |
| <p>Continuity of Frontage - Proposed Rule 2.2.1, 1.2 (Volume 3, Part 3), p. 42</p> | <p>Oppose/Clarify</p> | <p>NGĀI TAHU seeks clarity on whether the rule applies at all levels of the building. NGĀI TAHU seeks this clarity in order to understand whether variation in design is anticipated through steps, where for example ground level may be stepped back into the site with the second level being located on the road boundary.</p> |
| <p>Public Open Space Definition (Referred to throughout the CCP)</p> | <p>Drafting Error/Clarify</p> | <p><i>Public Open Space</i> is a new term referred to in the CCP and is not currently defined. A definition is required as a number of new provisions refer to this term for example a requirement to build to the boundary with public open space (no setback)</p> |
| <p>Heritage sites exemptions from other standards - Rule 1.3.3(4), (Volume 3, part 10) p.187</p> | <p>Amend</p> | <p>NGĀI TAHU notes that the amended heritage provisions no longer exempt activities on sites containing heritage buildings from the requirement to comply with all transportation standards. There is only an exemption from the cycle parking related standards. NGĀI TAHU considers that this exemption should still apply giving owners of heritage buildings the flexibility to focus on the heritage values of the item rather than on accommodating transportation provisions. It is likely in any case that the operations proposed on sites containing the heritage item are likely to require a level of compliance with transportation rules, but it is considered appropriate to be consistent with the City Plan direction to date to leave this to the owners discretion.</p> |
| <p>Cycle parking and associated lockers - Rule 2.5.1, (Volume 3 Part 13)p.144</p> | <p>Oppose/Amend</p> | <p>NGĀI TAHU considers that the requirement to provide lockers in association with showers should be at the discretion of a land lord and tenant. In some cases, depending on the type of tenant, lockers may not be a requirement and therefore is an additional cost for businesses in contemplating leases within the central city. The requirement for the provision of lockers should be removed from the CCP as this is a tenant fit-out requirement.</p> |
| <p>Requirement to achieve pass rating under Build Green</p> | <p>Clarify/Amend</p> | <p>NGĀI TAHU supports sustainable building outcomes and note that there is a mandatory requirement to achieve a pass rating under the Build Green Christchurch Tool. In addition, a bonus</p> |

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| <p>Christchurch Tool – Rule 2.2.3 (Volume 3, Part 3) p. 53</p> | | <p>floor can be achieved is the building achieves a green star rating under the New Zealand green Building Council Green Star rating. NGĀI TAHU supports the provisions which provide for a bonus floor to be achieved is a pass rating under the Christchurch Build Green Tool is also achieved. Ngai Tahu seeks clarity on the difference between these provisions.</p> |
| <p>Maximum parking numbers Rule 2.4.1 (Volume 3, Part 13) p.131 and Temporary Car Parks for Earthquake Recovery - Rule 2.4.16 (Volume 3, Part 13), p. 142</p> | <p>Comment</p> | <p>NGĀI TAHU acknowledge the shift in parking provisions proposed by the CCP and that the Council will provide facilities to deal with parking demand to ensure that activities are not discouraged from central city accommodation options due to lack of parking.</p> |
| <p>Vehicle Access to Parking Locations – Rule 2.4.14, (Volume 3, Part 13)p.141</p> | <p>Amend/Clarify</p> | <p>NGĀI TAHU seeks that the standard is amended to ensure that it is clear that the 10m setback requirement does not apply to basement car parking or car parking provided at levels above ground.</p> |
| <p>Parking spaces for people with disabilities – Central City Zones - Rule 2.4.3 (c) (Volume 2, page 134)</p> | <p>Clarify</p> | <p>NGĀI TAHU supports the provision of parking spaces for people with disabilities in all parking areas , however notes the provision requiring all buildings with a Gross Floor Area of 1500m2 or higher are required to provide parking spaces for people with disabilities, even if no other parking spaces are provided. Appendix Four includes a diagram showing the implications of this standard. NGĀI TAHU seeks clarification on whether the plan intends for this to be the case as the requirement will also require access, manoeuvring, and associated area on site for this space.NGĀI TAHU,</p> |
| <p>Vehicle Access to Parking Locations - Rule 2.4.14 (Volume 3, Part 13) p. 141 and roading classification – “Way “</p> | <p>Oppose</p> | <p>NGĀI TAHU opposes this requirement as some activities require more than one access point. Such activities include emergency services such as the Police. It can be necessary to ensure that access is possible off different frontages so that if one access becomes unusable (such as after an earthquake event) an alternative access can be used.</p> <p>With respect to the Police site, it is noted that network changes such as the Way on Cambridge Terrace should ensure that the changes accommodate the needs of the adjoining land uses. The Police will need to continue to gain efficient vehicle access along this portion of Cambridge Terrace in order to carry out Police duties.</p> |
| <p>Policies relating to Distributions of Commercial Activity and Commercial</p> | <p>Oppose</p> | <p>NGĀI TAHU oppose these provisions on the following grounds:</p> <p>Firstly, the plan is a central city recovery plan, addressing such policies is therefore outside the brief</p> |

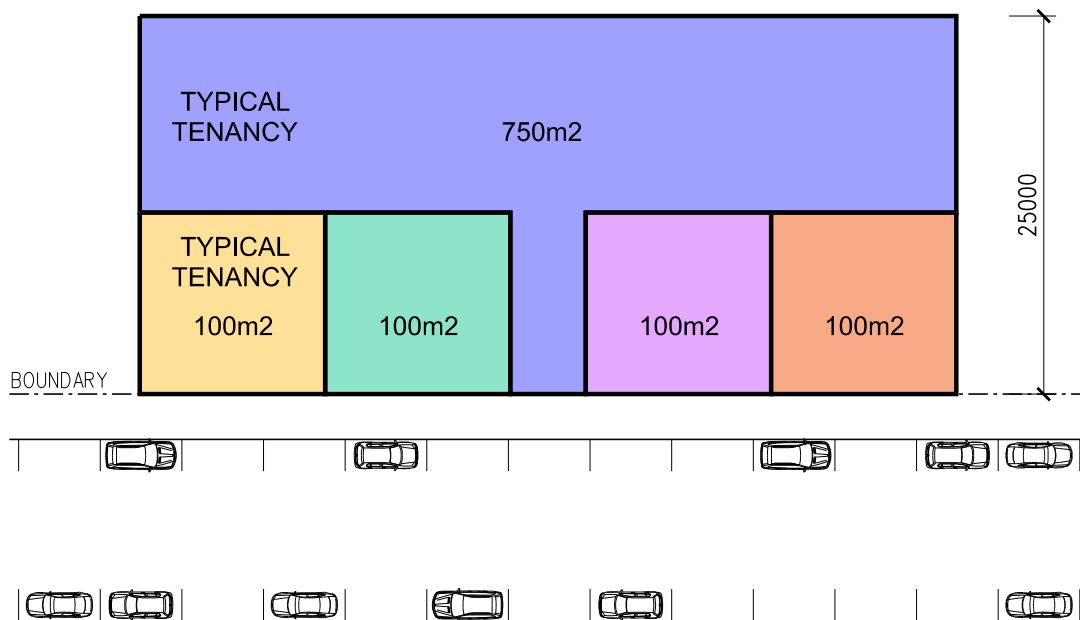
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| <p>Centres(Volume 2, Section 12) p. 26-29</p> | | <p>of the plan.</p> <p>Secondly, the Policies are included without any supporting implementation methods. This creates confusion as to the intention and implementation of such policies. This confusion creates uncertainty for investors , developers and businesses in this current climate where business activity outside the central city is necessary.</p> <p>Thirdly, and significantly, the policy refers to restricting commercial activity within <u>existing</u> business zones. NGĀI TAHU is opposed to this intention. Not only is business activity necessary within existing suburban business zones at present in order to cater for the demands placed on these centres in the post-earthquake climate, but these existing business zones are in place to provide the necessary convenience business activity and services to the community. In the future, when the central city is operational, these communities will continue to require this anticipated business activity and level of service and it would be an inefficient method to restrict the provision of such activity.</p> |
| <p>Designations (Planning Map 2)</p> | <p>Comment</p> | <p>NGĀI TAHU acknowledge the inclusion of the designations over the Police and Court’s site on Planning Map 2 of the CCP and comment that in their review the CCP does not alter or affect these designations in any way.</p> |
| <p>Road network changes (Map, Volume 1 p 86)</p> | <p>Drafting Error/Clarify</p> | <p>NGĀI TAHU have reviewed the Map showing road network changes and note that a bus route appears to be proposed along Cashel Street within the Central City. NGĀI TAHU seeks that the plan is reviewed for drafting errors and clarification is provided as to the road network changes proposed. These network changes are important consideration for investors and developers in designing the layout and use of their sites.</p> |
| <p>Road network change process</p> | <p>Comment/Clarify</p> | <p>NGĀI TAHU seek confirmation in the CCP that any road network changes, including changes to the classification and function of roads, such as Cambridge Terrace being re-classified as a Way, will follow the normal Local Government Act process.</p> |
| <p>Existing use Rights p.3</p> | <p>Comment/Clarify</p> | <p>NGĀI TAHU seeks that the Council clarify whether existing use rights will be able to be extinguished by the Minister as per the discussion on page 3 of the introduction to Volume 2, or whether existing use rights will be able to be exercised.</p> |

| ADDITIONAL SUGGESTIONS/COMMENTS | | |
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| Provision | Comment | Specific Comment |
| Implementation/Incentives | Comment | Ngāi Tahu considers that the recovery plan, in addressing implementation should have more of a focus and include detail on the role of public private partnerships. This method of implementation will assist with recovery and therefore should have a stronger emphasis in the CCP. |
| Street numbers and building identification | Comment | NGĀI TAHU are of the view that posting street numbers on buildings for identification purposes is an appropriate feature that could be introduced through the recovery process. Having easily identifiable buildings is consistent with the principles proposed through the CCP to have improved interaction between the street and buildings. This feature will assist with introducing people back into the City as the environment will be dramatically different compared with when the public left the city in February. |
| Supermarket provision | Comment | NGĀI TAHU support the Council's vision to improve the central city living environments and encourage people to live work and play in the city. NGĀI TAHU is of the view that if this vision is to be achieved, it is necessary to provide for the convenience needs of people who reside in the central city. The CCP in this sense should have a greater focus on the provision of supermarket facilities and NGĀI TAHU questions whether the provision currently indicated by the CCP is consistent with the vision for central city living. |

ATTACHMENT TWO
RETAIL FLOOR AREA PLAN

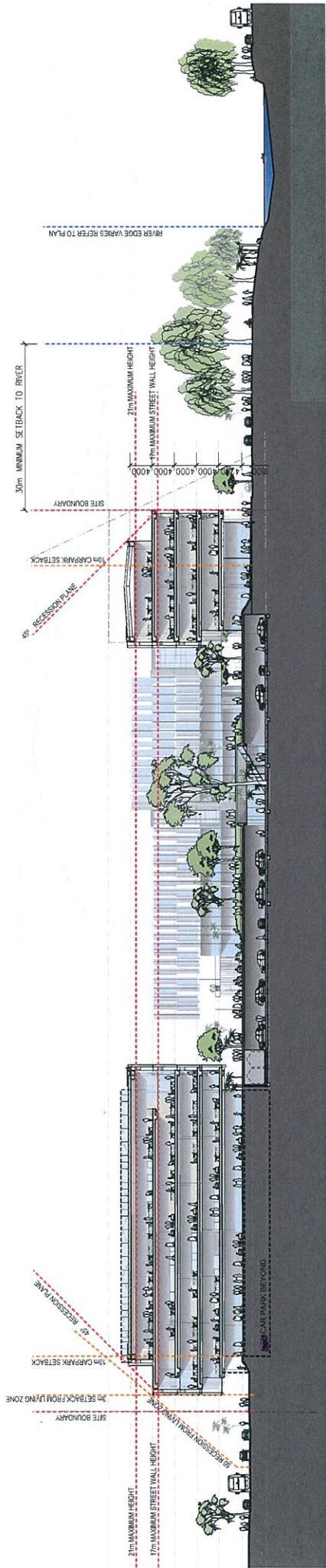


01 PROPOSED - TYPICAL SITE

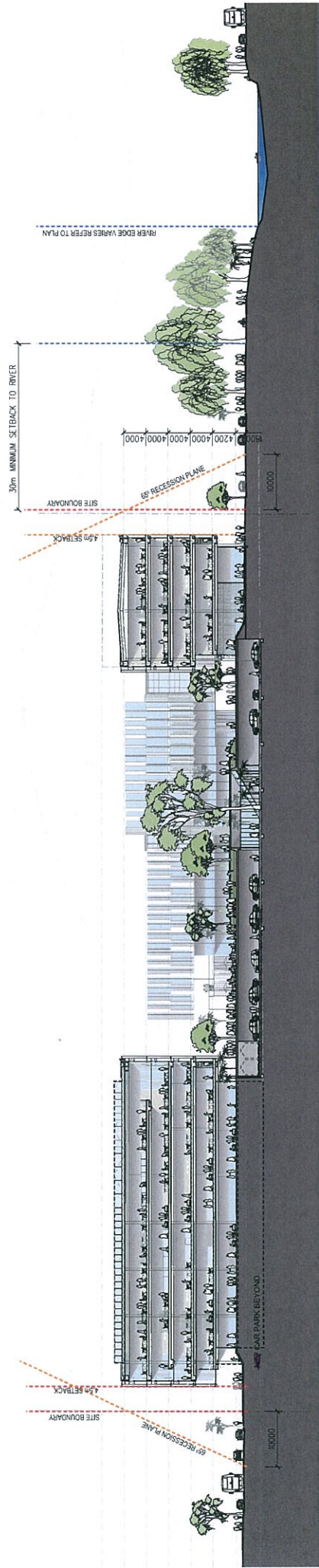


02 POTENTIAL - TYPICAL SITE

ATTACHMENT THREE
PLAN SHOWING IMPACTS OF RECESSION PLANE RULES

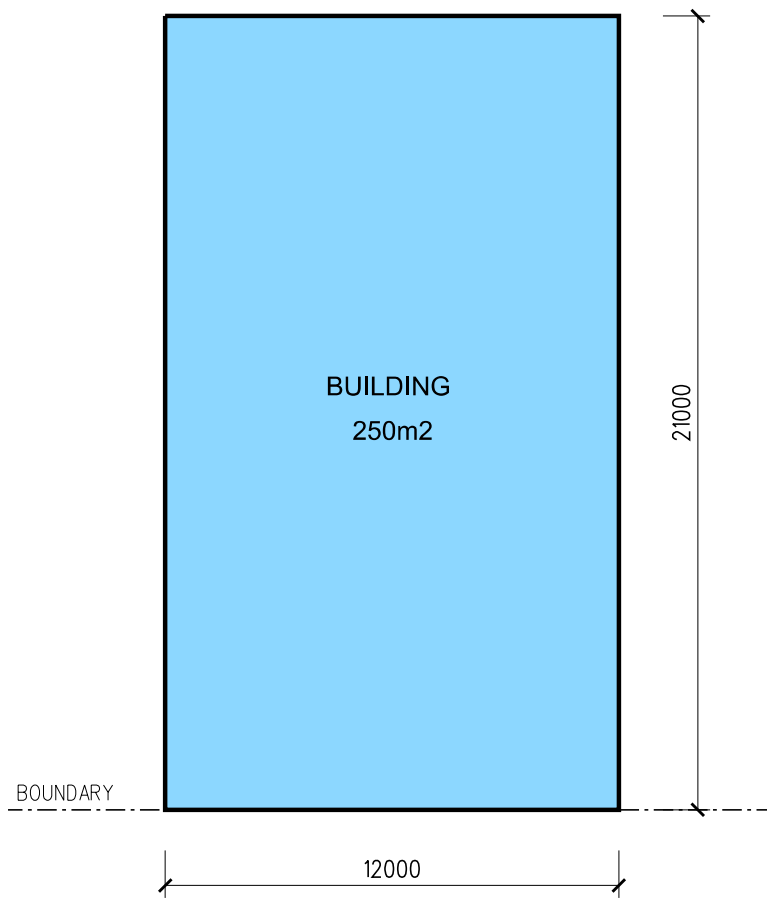


PROPOSED DRAFT CENTRAL CITY PLAN

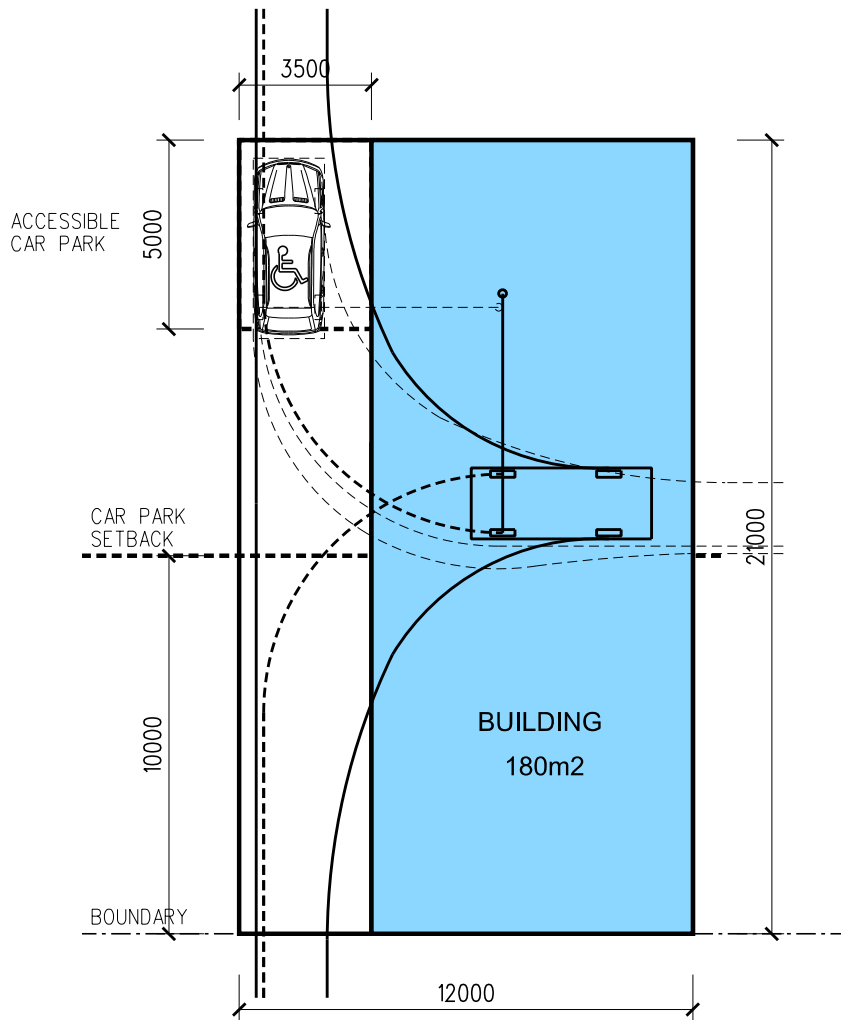


CURRENT CITY PLAN

ATTACHMENT FOUR
PLAN SHOWING IMPACTS OF CCP STANDARD 2.4.3(C)
PARKING FOR PEOPLE WITH DISABILITIES



01 EXISTING - TYPICAL SITE



02 PROPOSED - TYPICAL SITE