Contents

A. Introduction **2**

B. Summary of Submission **3-5**

1. Volume 1 – Draft Central City Plan
2. Volume 2 – Draft Central City Plan
   Regulatory Changes to City Plan 2005
3. Land Classification
4. Recovery Plan
5. Earthquake Resilient Buildings

C. Draft Central City Plan Top 10 Projects **6-8**

1. Avon River Park/Papawai Otakaro
2. Compact CBD
3. Light Rail
4. Metro-sports Hub
5. Christchurch Hospital
6. Cathedral Square
7. Central Library
8. Transport choice
9. Convention Centre
10. Neighbourhood Parks

D. The urgent need for a Recovery Plan **9-12**

1. Prioritisation of Projects
2. Set aside Volume 2
3. Consult with key stakeholders
4. Test Council's list of projects
5. Work with the requirements of the City Plan 2005
6. Urban Design Panel

E. The Branch's 12 priority projects **13-14**

Part A – Business Recovery
Part B – Community Recovery

F. Appendix 1 Notes **15**

G. Appendix 2 Notes **16**

A. Introduction

This submission to the Draft Central City Plan has been prepared by the members of the Canterbury Branch of the New Zealand Institute of Architects. The Branch has 66 member firms and approximately 100 Architect members.

The Branch has consulted with a number of allied professional institutes in the preparation of this submission. The institutes consulted support our submission and in turn we support their submissions.

The allied institutes support our submissions are as follows.

- New Zealand Planning Institute NZPI
- New Zealand Institute of Landscape Architects NZILA
- Architectural Designers New Zealand ADNZ

The NZIA requests that we be heard at the City Plan hearings in conjunction with the institutes listed above.

B. Summary of Submission

1. Volume 1 - Draft Central City Plan

This volume contains many ideas the Branch members can support.

There are some concerns with its proposals, in particular how the ideas will be achieved and the order of priority given by Council of it's key projects. Discussion on the Council's ten priority projects is set out on pages 6-8 of this submission.

The Branch considers that the projects identified in the plan need considerable study, modelling and design development. This requires input from key stakeholders during the development of each project. Finally, adequate public consultation is required prior to adoption and implementation of the selected projects.

2. Volume 2 Draft City Plan – Regulatory Changes to the City Plan 2005

The Branch submits that the contents of Volume 2 are too prescriptive at this stage in the recovery process. In the meantime, Volume 2 should be set aside in favour of retaining the principles of the City Plan 2005 in the short term (up to 5 years).

The time available to prepare the contents of Volume 2 has been too short (we believe four planners took five weeks to draft Volume 2) and the regulations often contradict the aims of Volume 1 (we believe Volume 1 was written by a different team and little cross referencing has occurred).
There are other reasons for deferring the proposed regulatory changes and these include the following matters as set out by Council in the introduction to Volume 2.

1.3.1 Comments on the CBD Recovery Plan (known as the Central City Plan)

Comments on the draft CBD Recovery Plan received from the public may result in the hearings panel recommending a change to the Recovery Plan (and therefore the rules in the City Plan). Any changes would be included in the final version of the Council's draft CBD Recovery Plan provided to the Minister for consideration. The Minister may then approve, modify or withdraw all or part of the draft recovery Plan. Once the Recovery Plan is approved, the Minister will give notice in the Gazette and appropriate public notification.

1.3.2 Findings from the Royal Commission on Earthquake Building Failures

The Commission is not expected to release its findings as to the cause(s) of building failures from the earthquake until later this year. The findings of the Commission may necessitate changes to the Recovery Plan, and consequentially to the City Plan under direction in the Recovery Plan. Such changes are made under section 22(1) by the Minister, using the processes and consultation the Minister considers appropriate.

1.3.3 District Plan Review

Before the earthquakes of September 2010 and February/June 2011 the Council had a programme in place to review the District Plan to begin in July 2011. It is now anticipated that the review will begin within the next calendar year once the majority of work in establishing recovery policy is completed. The review will cover all of the zones within the City and Banks Peninsula but will not include those parts of the plan which are amended under direction in this Recovery Plan. However it will deal with issues that are contentious and which require updating and matters that were identified as part of the City Plan review programme. An example of such an issue is the matter of Special amenity areas or SAMS. The review is also an opportunity to further refine rules in this Central City plan, Volume 2. However under the CERA Act the City Plan may not be changed to be inconsistent with the Recovery Plan (section 23(1)(f)).

3. Land Classification

In addition to the three items above identified by Council as having an influence on the final City Plan, are the geotechnical investigations being carried out by Tonkin & Taylor which are coordinated by CERA. There are areas of land within the central city (Avon Loop) which are classified as orange zone and these may either become red or green. Zone boundaries cannot be finalised until such time as the land classification is publically notified.

4. Recovery Plan

The Branch is concerned that the Draft Central City Plan is not a Recovery Plan as required by the Canterbury Earthquake Recovery Act 2011.

The Draft Plan includes projects which are predominantly aspirational in terms of the medium to long term development of Christchurch over the 10-20 year term. **The immediate need is for a short term Recovery Plan.**

The Transitional City projects described in the plan are very preliminary and lack the detail necessary to proceed immediately with the recovery of the Central City.

The Branch has prepared a 12 point Recovery Plan which addresses the immediate needs of both business and the community.

5. Earthquake Resilient Buildings

The Branch commends the emphasis on Green Buildings but notes the lack of emphasis on earthquake resilient buildings. Christchurch has faced a natural disaster in the form of the 2010 and 2011 earthquakes, not an ecological disaster. Therefore there should be at least equal emphasis on earthquake resilient buildings.

There should be incentives for developments which include, over design, base isolation and PRESS/PRESSLAM (post tensioned concrete and timber structures). These technologies were pioneered in New Zealand and are regarded overseas as key solutions in dealing with major seismic events.

See Also the Branch's comments on the contents of Volume 2 in appendix 1 to this submission.

C. Draft Central City Plan Top 10 Projects

Our general summary of the Council's top ten projects is as follows.

1 only is business orientated.

- Convention Centre

5 predominantly relate to community recovery.

- Avon River Park
- Metro-sports Hub
- Cathedral Square
- Central Library
- Neighbourhood Parks

2 are transport related.

- Light rail
- Transport choice

1 is a central government project.

- Christchurch hospital

The Branch's concerns with regard to the Council's top 10 projects are set out below.

1. Avon River Park/Papawai Otakaro

The concept is laudable of extending a river park the entire length of the Avon River within the four avenues. However, many of the activities and features shown in the concept plan (Volume 1, page 33-34) are already in existence. The concept and the limited number of new elements introduced into this park will be of little economic benefit to the recovery. The river is already an attractive open space and is usable in its current form.

2. Compact CBD

This concept is realistic and is already recognised in principle by most parties. However, there should be introduced at the same time, a plan for the recovery of what becomes the central city fringe which extends over a large geographic area.

3. Light Rail

The concept of light rail is worth investigating as an important contribution to the City's transport system. However, it will be an extremely expensive project even if the majority of trains use the existing heavy rail system. Linking the satellite towns with the city must be a higher priority than investment in a new light rail connection between the University and the Central City. There are a number of experts expressing this very point in the media.
Any decision on light rail and other transport options must be made after an in depth study of where the population is and where they want and need to go, in particular post-earthquake where a portion of the population has relocated.

4. Metro-sports hub

This is one of the few truly new ideas introduced into the Plan and is to be commended as an idea. However, land investigation, location and viability requires careful modelling. The contribution to economic recovery of the central city is debatable due to its high capital cost, the second most expensive project after light rail.

5. Christchurch Hospital

This project will be funded by central government and is an essential project currently in planning.

6. Cathedral Square

The Branch considers further improvement of the Square to be of low priority at this stage. The main priority for its success is the establishment of active building frontages at ground floor all around the edge of the square.
The plan identifies the Square as being the main venue for civic events, festivals and performances and as such must continue to be a predominantly hard paved surface rather than be given over to large grassed areas. Apart from Hagley park the central city has three large public open spaces which are green (Victoria Square, Cramner Square and Latimer Square).

7. Central Library

Plans for expanding the existing library have been mooted for some years. The present site is well located relative to the river and central city area. It is a valuable community amenity but may not contribute in any significant way to the central city economy and recovery. Its future however, should be debated as soon as possible and access guaranteed to this and other key cultural amenities including the Christchurch Art Gallery and Town Hall when safe and repaired.

8. Transport choice

The Branch supports the transport targets stated in Volume 1 (see page 8). Any transport recommendations, however, need to be modelled carefully and this will take time.
There has been no supporting documentation made available during this consultation period therefore a detailed submission is not possible.
The priority in the short term should be improving accessibility around the city and into the red zone by whatever means can be introduced.

9. Convention Centre

This facility is a real economic driver and therefore should become one of the priority projects for the city in terms of its economic spinoffs.
It should be built in close conjunction with a high quality hotel and other attractions such as the Town Hall and Casino to attract in particular the high end high value conference market.
Its present location is considered to offer many benefits. The sooner its location is confirmed the sooner hotel companies will commit to re-building.

10. Neighbourhood Parks

The Branch supports this project to extend the number of local parks in the central city residential areas. However, it does not regard these as critical to the city's recovery. For these to be of benefit, priority should be given to the repair and rebuild of damaged dwellings within the central city residential area to retain the existing residential population.
Local shopping opportunities in the central city residential areas deserve greater priority at this stage in the recovery.

D. The urgent need for a Recovery Plan

The Branch asserts that timing of the City recovery is of the essence. Therefore, it offers the following alternative recommendations.

1. Prioritisation of Projects

Identification of projects which give priority to economic and community recovery should be made. Emphasis must be directed towards recovery in the short term. The Transitional City Projects within the City Plan need to be carefully selected to achieve recovery and need to be developed urgently before the city dies.

Several projects on the Council's list contribute a "feel good" but are unlikely to aid the recovery of the City at least in the short term (1-5 years). Investment in projects where there is a demonstrated economic return must take priority. Our proposed list of key projects is set out in the next section; refer to pages 13-16.

2. Set aside Volume 2

We recommend that the current regulatory framework of the city plan be retained to allow sufficient time to test, model and consult about the regulatory changes in Volume 2.

Before the regulations set out in Volume 2 are put in place, we believe the ideas and projects set out in Volume 1 must be reviewed in depth by key stakeholders in conjunction with the Council. Of equal importance, they should then be put out for public feedback when developed further. The process will require careful modelling and data collection and will take longer than the time allocated for public submissions (16 August – 16 September).

3. Consult with key stakeholders

The key stakeholders include the business community, landowners, local precinct and community groups in the area including Peterborough Village, ICON, Victoria Precinct, professional bodies involved in the built environment, including the NZIA, NZILA, NZPI, IPENZ, ADNZ and NZIQS, the legal and accountancy professions, human interest groups including religious, welfare and NGOs.

The main reasons for our proposal to extend the time are to tap into the real wealth of knowledge and experience of these groups and to acknowledge that without their buy-in these projects are unlikely to be realised and successful. Volume 1 also states that the above groups, particularly the

business and land owners are expected to contribute something like ten times the investment anticipated to be made by local and central government. These groups will not make this level of commitment and investment in the city unless they are consulted, have confidence in the process and the economic modelling demonstrates that adequate returns can be expected.

4. Test Council's list of projects

The Council's full list of projects set out in Volume 1 (see pages 121 to 123) are those that need to be subjected to detailed economic and social assessment. This requires more time than has been made available during the limited consultation period up to 16 September 2011.

Following the period of detailed assessment which we recommend, the list of key projects can be better prioritised and a realistic implementation plan formulated. This is essential as funding sources for the recovery and development of the city will be extremely limited.

In summary, the ideas set out in Volume 1 need to be "road-tested" and have buy-in from the numerous interest groups and stake holders in order for the ideas to ever become reality.

5. Work with the requirements of the City Plan 2005

The Branch recommends that the City Plan 2005 and its regulations remain in force in the immediate future and in particular, until such time as the influences that may cause changes to the rules have been resolved (Volume 2, Sections 1.3.1, 1.3.2, 1.3.3 and Land Classification).

6. Urban Design Panel

The Branch recommends more involvement of the Christchurch Urban Design Panel in all central city proposals. The Panel would be guided, but not constrained by the intent of the draft Central City Plan Volume 1. The Panel could assess proposals against some broadly agreed principles as proposed by the Branch's submission to Share an Idea. All planning applications would be treated as 'discretionary'. We believe many property owners and developers would be willing to have their proposals reviewed by the Urban Design Panel. Evidence of this is provided by feedback from applicants who have been involved in urban design reviews with the Christchurch Urban Design Panel and have stated the process is worthwhile and resulted in a better scheme than that which was originally presented.

The current NZIA Canterbury Branch Chairman Jasper van der Lingen has given a number of presentations to a wide range of groups as part of the Branch's initiative "Before After". During these presentations Jasper has discussed the merits of the Urban Design Panel for improving building design and this process has been enthusiastically supported by the various audiences'.

There are precedents now for an Urban Design Panel with Nelson City, Tasman District Council, Queenstown Lakes District Council and Auckland City Council all having Urban Design Panels.

However, should an applicant not want to take part in the Panel process there could be a second planning assessment path involving the existing City Plan 2005? This would give owners greater flexibility by providing an option to sidestep the Urban Design Panel route should they wish and select the City Plan rules based route.

The advantages of a two path process over a single path process are as follows.

i) Those who want certainty are still free to follow the old planning rules, but know there is more choice, should better outcomes be desired. Investors and markets love choice and certainty.

ii) A new approach is available that can expedite creative and/or difficult planning applications.

iii) Additional professional expertise frees up existing Council staff for other applications, reducing the potential planning bottleneck ahead of the City as it recovers.

iv) Design Panels can facilitate more of the planning objectives within Volume 1 than might arise from adherence to the existing plan alone and indeed the new City Plan Volume 2.

v) Design led Panels can enable more sensitive and financially viable development than is possible via existing 'as of right' development via bulk & location controls.

vi) Panels provide a useful proving ground and local precedent for use of design led assessment in whatever new planning environment is to follow.

vii) Shared panel work will foster the overlap of skills, understanding and cooperation between private practitioners and City Council planning professionals towards common goals – reducing any adversarial tensions.

viii) The resistance to the cost of running the Urban Design Panel by Council could be overcome by introducing a scale of fees to be paid by the applicant depending upon the scale of the project being considered. The Draft City Plan proposes a $10,000 fee for Christchurch Green Build assessment yet this is only one aspect of a buildings quality and contribution to the City. Competent design professionals could provide a Producer Statement confirming compliance with green Build saving a building owner this considerable cost which could be used instead for payment of the Urban Design Panel fees.

E. The Branch's 12 priority projects

The Branch's list of twelve priority projects in place of the Council's list is set out in two parts. **Part A** relates to projects which benefit the business recovery and **Part B** relates to projects which benefit community recovery. Some projects will of course be of benefit to the recovery of both groups. These priority projects would be integral to the Recovery Plan needed urgently

Part A – Business Recovery - Getting business back to the Central City

1. CBD Red Zone Access
   Provide access to business premises and land to allow business to resume and development to start. Precincts in addition to City Mall Re-Start are required – CERA demolition programme

2. Tidy up Central City
   Clear demolition sites of rubble, repair roads and foot paths, remove traffic cones and safety fencing, landscape empty site (eg. Greening the Rubble, Asko Site) and temporary shop fronts (eg. Quinns Containers). This is occurring on an ad hoc basis and needs to be coordinated as part of a comprehensive plan to improve the general quality of the central city environment so that it does not look like a "War Zone". This will make a clear statement "We are open for business".

3. Temporary buildings
   Council should support temporary structures to allow businesses and retail to return quickly to the central city. The life span of these temporary structures is more likely to be 5-10 years until such time as existing buildings are repaired and demolished buildings are re-built.

4. Convention Centre
   The convention centre brings considerable tourist dollars to the city and supports accommodation; retail and food & beverage sectors (see also section 5 below). This is one of the few projects we can agree with Council is a high priority.

5. Hotel Accommodation and tourism facilities
   Council should support the re-opening of hotels and tourist facilities to give tourist somewhere to stay and things to do in the city rather than simply transiting to other south island destinations. Establish an information centre (eg. iSITE) in the central city in association with a temporary earthquake recovery interpretation centre.

6. Roads and Parking
   Open as many roads as possible in the CBD and establish parking areas adjacent to retail precincts such as City Mall re-start.

Part B - Community Recovery - Getting back to home and city

1. Repair and re-build of damaged dwellings
   Council should support EQC and Insurers where possible in the repair and re-build of damaged dwelling within the central city.

2. Neighbourhood Centres
   Council should support the establishment and re-establish of important amenity to residential communities such as corner shops and health centres.

3. City amenities
   Council should re-open the Art Gallery, repair the Central Library, establish a temporary library in the city north area and re-build local sports amenities such as the Centennial Pool (perhaps on different site).

4. Open spaces
   Council should reinstate access to Avon River, Victoria Square and Cathedral Square and run events in these spaces. The "Greening The Rubble" project should be extended into the central city residential area.

5. CBD Red Zone Access
   Council should assist residents with access to business and retail precincts where ever possible in addition to City Mall re-start.

6. Public Transport
   Establish a temporary bus exchange on Lichfield Street.

The Branch has identified the above as obvious gaps between CCC and CERA responsibility for the recovery. The Branch sees these as critical initial projects to ensure the recovery of the centre in terms of both the business and residential communities which are at risk of capital flight and/or residential flight.

The more aspirational projects included in Volume 1 can be pursued in the medium to long term after the 12 projects we have suggest are implemented as part of a short term Recovery Plan.

Implementation of the right short term recovery initiatives will lead to the redevelopment of the Central City desired by the Council, business and general public.

The Branch stresses again here that there seems to be no Recovery Plan as required by the Canterbury Earthquake Recovery Act 2011, contained within the Draft Central City Plan. A Recovery Plan must be prepared urgently.

F. Appendix 1 Notes

The Branch has reviewed the contents of Volume 2 and its summary of each of the sections of the document are contained in this appendix as follows.

i) Central City Living Zone
ii) Central City Core Zone and Central City Fringe Zone
iii) Central City Business 1 Zone
iv) Central City Mixed Use Zone
v) Transport and Parking
vi) Changes to Heritage Provisions
vii) Build Green Christchurch
viii) Changes to Temporary Activities and Buildings

In the limited period of time available to review Volume 2 the Branch has concluded that the majority of the proposed regulations have not been investigated sufficiently or modelled to test the outcome(s) anticipated and stated in the Volume 1 & 2 and to check for unintended outcomes. Therefore Volume 2 should not be approved or instigated.

G. Appendix 2 Notes

This Appendix is the Branch's submission to Share an Idea - NZIA Canterbury Branch, Recommendations for a Design Led Reconstruction of the Christchurch City Centre. The Branch continues to support the ideas contained therein.

The twelve recommendations the Branch made is this document are summarised as follows.

1. Make it easier to return than not
2. Deliver certainty of change – quickly
3. Recognise the inherent weakness of a planning rule based approach in delivering urban quality
4. Recognise that urban amenity does not arise from merely regulating building bulk and location within each site
5. Utilize vacant council land to facilitate greater urban amenity more cheaply
6. Do not lose the past
7. Acknowledge that one size does not fit all
8. Address the need for redevelopment coordination across multiple sites and ownerships
9. Facilitate Sustainability
10. Create a strong urban edge and encircling green belt to the CBD
11. Facilitate and reinforce the development of urban precincts of unique character
12. Immediately establish an independent 'City Architect' role with significant executive power as the core of an independent design-led urban planning and recovery strategy