NZIA CANTERBURY BRANCH SUBMISSION FOR DRAFT CENTRAL CITY PLAN

CENTRAL CITY CORE ZONE AND CENTRAL CITY FRINGE ZONE

Overall Recommendation

i) That the rules become 'design guidelines' with the outcome controlled by the Urban Design Panel.

ii) That the Urban Design Panel be given some legislative power so their recommendations are followed.

1. STREET INTERFACE - CONTINUOUS BUILT EDGE

A. STATED AIM

A combination of minimum and maximum building heights and consistent setbacks create a strong built edge that provides visual definition and enclosure of streets. (Volume 1 pg. 57)

B. METHOD OF ACHIEVING STATED AIM

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Rule 2.2.1 Development standard - Street Interface (pg. 42)

1.1 Building setback from street boundaries
All buildings built to public road and public open space boundaries (public open space includes a public lane).

1.2 Continuity of Facade
100% of frontage where it abuts public road boundaries, public open space and public lanes (80% to Fringe). Exception allowed for 10 x 10m (max) outdoor plaza on a public lane.

C. OUTCOME OF PROPOSED METHOD

Positive outcomes

i) Creates a strong defined built edge to the street.

ii) Reduces amount of poorly utilised open space & car parks along street frontage.

Negative outcomes

i) Natural light into buildings now from only 2 sides therefore can not have a deep plan and will struggle to comply with 'natural light' criteria of Greenstar.

ii) Views from buildings will be limited to 2 sides only and will struggle to comply with 'external views' criteria of Greenstar.

iii) Buildings on sites that run through city blocks with 2 street frontages will not comply if the size of building proposed can only address one frontage.

iv) Colonnades to buildings at street level which the Institute believes allows for more generous footpaths and articulation & modulation of the building façade will not comply.

D. RECOMMENDATION

i) The Branch does not support these rules.
ii) Continuous built edge should be controlled by the Urban Design Panel rather than by rules.

2. STREET INTERFACE - GROUND FLOOR INTERACTION (ENTRANCES)

A. STATED AIM OF THE PLAN

Orientating buildings towards the street, through a high level of façade transparency and positioning all main building entrances along the street, sustains street life and improves public access and safety.
(Volume 1 pg. 57)

B. METHOD OF ACHIEVING THIS AIM

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Rule 2.2.1 Development standard - Street Interface (pg. 43)

2.1 Numbers of primary entrances
One entrance minimum per 10m of building frontage (does not apply to Fringe).

2.2 Location of primary entrance
To be located in a clear, legible location on the primary street for all new buildings (does not apply to Fringe).

C. OUTCOME OF PROPOSED METHOD

Positive outcomes
i) Provides an active and 'permeable' street edge if all entries are used as intended.

Negative outcomes
i) Often the developer does not know what use the tenancy will have until after the building is built so difficult to comply with at planning stage.
ii) Additional cost for developers to provide doors that are not required by a tenant.
iii) Rule is too prescriptive and there are to many exceptions to it for it to be applied e.g. Central Public Library. For security reasons a retail shop generally operates with one entry – if it has a 20m frontage it will require two primary entries etc.

D. RECOMMENDATION

i) The Branch does not support these rules.
ii) Ground floor interaction (entrances) should be controlled by the Urban Design Panel rather than rules.

3. STREET INTERFACE – WINDOWS, DOORS, BALCONIES & VERANDAS

A. STATED AIM OF THE PLAN

Orientating buildings towards the street, through a high level of façade transparency and positioning all main building entrances along the street, sustains street life and improves public access and safety.
(Volume 1 pg. 57)

B. METHOD OF ACHIEVING THIS AIM

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Rule 2.2.1 Development standard - Street Interface (pg. 43 / 44)

3. Windows, doors, balconies above ground floor and verandas

3.1 Glazing to solid percentage on Ground Floor
Minimum 60% glazing; maximum 40% solid
(Minimum 30% glazing, maximum 60% solid to Fringe)

3.2 Glazing to solid percentage on Upper Floors
Minimum 30% glazing; maximum 70% solid

C. OUTCOME OF PROPOSED METHOD

Positive outcomes
i) Improves public safety with overlooking into the street.

Negative outcomes
i) Over prescriptive and will not necessarily create better design outcomes.
ii) Glazing / solid requirements do not suit every building type eg Picture Theatre.

D. RECOMMENDATIONS

i) The Branch does not support these rules.
ii) Windows, doors balconies & verandas should be controlled by the Urban Design Panel rather than rules.

4. STREET INTERFACE – WEATHER PROTECTION

A. STATED AIM OF THE PLAN

Features such as verandas and canopies support year-round pedestrian access and clearly denote important retail edges of key entry points. (Volume 1 pg. 57)

B. METHOD OF ACHIEVING STATED AIM

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Rule 2.2.1 Development standard - Street Interface (pg. 44)

3.3 Verandas
Required in majority of locations through the central city core, but not required to most of Fringe except Colombo Street & High Street.

C. OUTCOME OF PROPOSED METHOD

Positive outcomes

i) Supports year-round pedestrian access through the CBD.

Negative outcomes

i) There are other alternatives that can achieve the aim of this rule such as colonnades that provide wider footpaths for pedestrians and activities as well as weather protection.

D. RECOMMENDATIONS

i) The Branch does not support these rules.
ii) Weather protection should be controlled be Urban Design Panel rather than rules.

5. STREET INTERFACE - ACTIVE FRONTAGES TO STREETS & LANES

A. STATED AIM OF THE PLAN

To create a vibrant and lively environment by ensuring frontages within the core commercial area are activated.
(Volume 2, 12.2.6 Policy: Active Frontages, pg. 32)

B. METHOD OF ACHIEVING THIS AIM

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Rule 2.2.6 Active Frontages Streets and Lanes (pg 60)

i) The use in the front 10m of the ground floor of every building fronting a street is limited to retail, commercial, places of entertainment, receptions for hotels, or entrance ways for other activities.
ii) The use in the front 5m of the ground floor of every building fronting a lane is limited to retail, commercial, places of entertainment, receptions for hotels, or entrance ways for other activities.

Also: **Rule 2.2.1 Development standard – Building Appearance** (pg 46)

3. Location of on-site carparking and loading areas
To be located to the rear, top, within or under buildings
If within the building, not within 10m of the road boundary.

C. OUTCOME OF PROPOSED METHOD

Positive outcomes
i) Creates active street frontages.
ii) No parked cars will be visible along street frontage.

Negative outcomes
i) Often the developer does not know what use the tenancy will have until well after the building is built so it could be impossible to comply with at a planning stage.
ii) Theoretically a building owner will have to apply for a Resource Consent every time a tenant activity changes. Tenants do not always need a Building Consent for a new fitout, so there is no obvious methodology to achieve this.
iii) This is too prescriptive. There are exceptions to this rule (activities not listed) that will activate a building frontage e.g. the existing Central Public Library.

D. RECOMMENDATIONS

i) The Branch does not support these rules.
ii) Active street frontages to streets and lanes should be controlled by the Urban Design Panel rather than by rules.

6. BUILDING APPEARANCE - SUNLIGHT

A. STATED AIM OF THE PLAN

To ensure a high level of sunlight access to public space and important pedestrian streets in the central city as it recovers from the Canterbury earthquakes of 2011 and 2011.
(Volume 2 Policy 12.4.4 Sunlight, pg. 37 / 38)

B. METHOD OF ACHIEVING THIS AIM

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Rule 2.2.1 Development standard – Building Appearance (pg 45)

1.1 Recession planes

For Cashel and High Sts	- 45° from top of 17m max street and lane wall
For remainder of Core zone	- 45° from top of 21m max street and lane wall
For most of Fringe zone	- 45° from top of 17m max street and lane wall

4.1 Building over lanes
No building shall protrude over a lane space, except for retractable awnings less than $2m^2$ over a pedestrian entrance.

C. OUTCOME OF PROPOSED METHOD

Positive outcomes

i) Provides sunlight at street level.

Negative outcomes

i) It dictates a building 'type' - a pitched roof on top of a 6 storey that will not necessarily translate into good urban design.
ii) The level of sunlight penetration to street level is determined by the building's orientation -. a building on the south side of a street could be taller as its height has no impact on sunlight (i.e. it can not overshadow a street or public space).
iii) Building over part of a lane may be acceptable (Eg. Air Bridge).

D. RECOMMENDATIONS

i) The Branch does not support these rules
ii) Sunlight should be controlled be Urban Design Panel rather than rules

7. BUILDING APPEARANCE – HEIGHT & FORM

A. STATED AIM OF THE PLAN

To ensure that the shape, scale and physical form of the built environment in the central city is improved and appropriately reflects the environmental qualities of the area as it recovers from the Canterbury Earthquakes of 2010 and 2011. (Volume 2, 12.4.6 Policy: Urban Form and Design, pg 38)

B. METHOD OF ACHIEVING STATED AIM

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Rule 2.3 Community Standard - Building Appearance (pg 61)

1. Height and Form
Minimum floor to floor height on ground floor: 4.5m
Maximum Height:
In most parts of the Core 6 floors maximum (5 + 1 setback) up to 25m
Can go to 7 floors if building qualifies for a bonus floor
3 floors / 13m minimum height

In most parts of the Fringe 4 floors maximum up to 17m
Can go to 5 floors if building qualifies for a bonus floor
2 floors / 9m minimum height

Buildings qualify for a the bonus floor by achieving one of the following
(Note: the bonus only appears to apply to Central City Core zone)

- Obtain a NZ Green Building Council green star rating
- Providing pitched roofs between 30° & 60° and the roof space shall not contain more than one storey
- Heritage and character façade retention
- Contribution of land towards a comprehensive lane / courtyard network within the block the building is located

Exceptions:
Cashel & High Streets: 17m Maximum Street and lane wall height
New Regent Street: 2 floors maximum up to 8m
Pitched roofs between 15° and 60° are permitted over and above the height limits provided roof space shall not contain more than one storey.

C. OUTCOME OF PROPOSED METHOD

Positive outcomes

i) Provides sunlight at street level

Negative outcomes

i) Concern that this will limit / discourage development in the CBD making it difficult for developers & owners to achieve sufficient returns on the land value.
ii) Premature to provide an appropriate height limit for the CBD without knowing the context of the existing CBD after demolition is completed.
iii) Other than Cashel St mall and High St there is no differentiation in built form throughout the CBD and therefore no recognition of the different character of its parts e.g. river front sites.
iv) No height bonus available to Central City Fringe zone sites (this appears to be a formatting mistake in the table).

D. RECOMMENDATIONS

i) The Branch does not support these rules.
ii) Height & form should be controlled be Urban Design Panel rather than rules.

8. URBAN FORM & DESIGN

A. STATED AIM OF THE PLAN

To ensure that the shape, scale and physical form of the built environment in the central city is improved and appropriately reflects the environmental qualities of the area as it recovers from the Canterbury Earthquakes of 2010 and 2011. (Volume 2, 12.4.6 Policy: Urban Form & Design, pg 38)

B. METHOD OF ACHIEVING STATED AIM

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Rule 2.2.2 Development standard – Sites where discretionary activity status applies (pg. 49)

The whole of the Central City Core is within the area subject to Urban Design Assessment (Planning Map 4) and has restrictive discretionary activity status.

Rule 2.2.4 Development standard - Urban Design appearance and amenity residential activities (pg. 54)

As everything in the Central City Core is subject to Urban Design Assessment, this is already included by default so is more applicable to the Central City Fringe Zone.

Erection of new or alterations and additions to existing buildings (including accessory buildings) that result in

- 3 or more residential units or
- 1 or 2 residential units on a site smaller than 300m2 gross site area or
- 1 or 2 residential units resulting in residential floor area greater than 550m2

Are restrictive discretionary activities and will be subject to urban design assessment.

Design panel would be made up of representatives from bodies such as Institute of Architects, Institute of Landscape Architects and Historic Places Trust.

Assessment matters (see pages 50 – 53)

a. General matters
b. Site and context layout
c. Relationships with street and open space
d. Corner sites
e. Building form and appearance
f. Site access and car parking / servicing
g. Landscaping and site amenity
h. Service areas and utility

C. OUTCOME OF PROPOSED METHOD

Positive outcomes

i) The shape, scale and physical form of the built environment in the central city is improved.

Negative outcomes

i) The Urban Design Panel can only make 'recommendations'.

C. RECOMMENDATIONS

i) The Branch does not support these rules.
ii) Urban form & design should be controlled be Urban Design Panel rather than rules and that the rules become 'design guidelines'.
iii) That the Urban Design Panel be given some legislative power so their recommendations are followed.

9. BUILDING SUSTAINABILITY

A. STATED AIM OF THE PLAN

The environmental design and performance of commercial buildings will be advanced through the creation of a new building assessment tool specifically designed for the Christchurch rebuild. To encourage best practice in building design and performance, the Council will encourage Green Star buildings using a range of financial and non – financial incentives. (Volume 1, pg. 44)

B. METHOD OF ACHIEVING THIS AIM

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Rule 2.2.3 Development Standard - Building Sustainability (pg. 53)

All new buildings of all types to receive a pass mark rating under the 'Build Green Christchurch' tool (developed by the NZ Green Building Council).

No pass mark – building becomes a restricted discretionary activity (limited to building sustainability).

(Volume 2, pg. 206 contains 'Build Green Christchurch' explanation and the rating tool).

C. OUTCOME OF PROPOSED METHOD

Positive outcomes

i) That new buildings meet a minimum level of sustainability.

Negative outcomes

i) Financially this might become quite onerous for land owners building small inexpensive buildings as it will cost much the same for any size buildings.
ii) Concern that 'Build Green Christchurch' is as onerous or prescriptive as the current NZGBC Green Star process.
iii) Difficult to comment on or assess as no' pass mark' is noted in the Draft Central City Plan.
iv) The NZGBC is a private organisation and as such the requirement to have them provide assessment might be in breach of Councils delegation under 34A of the RMA.

D. RECOMMENDATIONS

i) The Branch does not support this rules without further information.
ii) That new buildings meet a minimum level of sustainability but 'Build Green Christchurch' must be simple and inexpensive to use.
iii) Architects/Designers should be allowed to show compliance with a Producer Statement.

10. RETAIL DISTRIBUTION

A. STATED AIM OF THE PLAN

To encourage the establishment of a core retail environment within the central city and limit retail activity in fringe locations. Core retail areas focused on comparison shopping in a pedestrian friendly environment. (Volume 2 12.2.10 Policy : Retail Distribution pg 34)

B. METHOD OF ACHIEVING THIS AIM

Rule 2.2.5 Development standard – Retail Gross Leasable Floor Areas (pg. 57)

1. City South Retail Area
   City South Area shown on planning map 2 the minimum gross leasable floor area for any new retail activity shall be 450m^2

2. Central City Core and Central City Fringe Retail Areas
   Retail activities permitted but limited to a maximum net floor area of 450 m^2
   Does not apply to food and beverage outlets or Department Stores (e.g. Ballantynes).

C. OUTCOME OF PROPOSED METHOD

Positive outcomes

i) None.

Negative outcomes

i) Overly restrictive and provides another disincentive for retailers to come back to the CBD.
ii) Takes away some 'variety' in retail types from the CBD.
iii) Excludes some existing central city retailers.

D. RECOMMENDATIONS

i) The Branch does not support this rule.