

## COMMENT ON LAND USE RECOVERY PLAN REVIEW

Environment Canterbury

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CHRISTCHURCH 8140

By email only: [LURP@ecan.govt.nz](mailto:LURP@ecan.govt.nz)

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Christchurch 8140

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(Signature of applicant or person authorised to sign on behalf of the applicant)

Date: May 29, 2015

### **Topic Areas: Direction and Coordination, Communities and Housing**

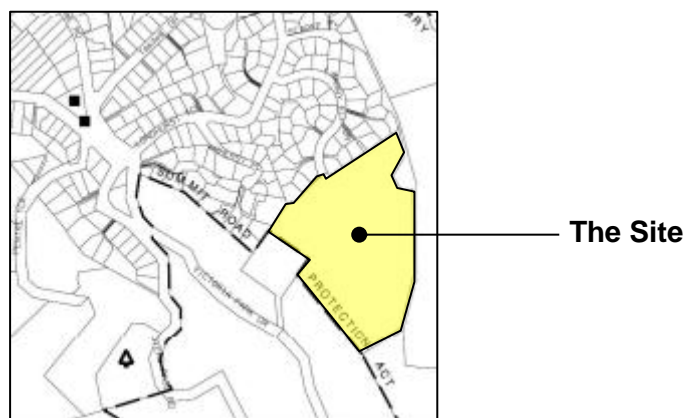
#### Introduction/The Site

This Comment is made on behalf of Cathedral City Holdings Ltd (CCHL) who own a 6.8ha block of land ('the Site') on the Port Hills with access via the Harry Ell Drive existing residential area (see location plan below). The Site is currently planted in radiata pine which is 21 years old but not a viable forestry lot due the small size and generally unfavourable site conditions (exposure to winds, low fertility soils etc.). The trees can be removed at any time, as they are of minimal value and will not generate an economic return. Access for any rural or forestry use is problematic, as the only access is via the Harry Ell Drive and through the existing residential subdivision. Farm and forestry related vehicle usage would not be compatible with the adjoining residential activity.

The Site is located on a broad spur – the eastern boundary is above and beyond a series of rocky outcrops with the land beyond these outcrops falling steeply into Bowenvale Valley below. The Site boundaries are clearly defined by existing topographical and land ownership features. The western eastern boundary of the Site is generally on the crest of this broad spur and adjoins the Council owned Victoria Park. There is a 5m wide access strip along the eastern boundary which CCHL vested in the Council some 30 years ago and this access strip provides between Scarf Place/Longhurst Terrace and Victoria Park.

The land to the west is part of Victoria Park, a major Port Hills outdoor recreational area which is extensively used by the local community and wider Greater Christchurch residents. It contains childrens' play areas and an extensive network of walking and mountain bike tracks, linking to the Summit Road recreational area.

The Site is 230 to 250m amsl. It is outside the area subject to Summit Road Protection Act - the western boundary follows the lower boundary of the Summit Road Protection Act as illustrated below:-



The Summit Road Protection Act specifically controls structures, forestry and subdivision activities on upper slopes of the Port Hills.

#### Development Proposal and Proposed Zoning

CCHL propose to develop the Site for lower density residential purposes in accordance with the proposed Christchurch Replacement Plan (pRDP) Stage 2 Residential Large Lot (RLL) zoning. This is consistent with the zoning that applies to a number of other areas at the upper boundary of the existing Port Hills residential areas (including at Monks Spur; Bridle Path Road and Morgans Valley, Heathcote; Pentre Terrace, Cashmere; Worsleys Road; Redmund Spur, Cashmere Road; and Kennedys Bush). The minimum lot size for the RLL zone is 1500m<sup>2</sup> (a number of the existing areas have density overlays with a minimum lot size of 3000m<sup>2</sup>).

The proposed development concept is attached as **Appendix A**. A generous landscaped 'edge' of native planting is proposed along the Site boundaries with Victoria Park and the eastern slopes of Bowenvale Valley (zoned Open Space Natural and Rural Port Hills respectively in the pRDP Stage 2). The development will yield approximately 10-12 sections, with vehicle access via Harry Ell Drive. The developer is prepared to remove the existing pines from the Site but it is the intention in the short term to retain a significant swathe of trees to provide shelter for a broad planting of native trees and shrubs.

The development concept proposes a number of environmental enhancement measures as follows:-

- Widening and mass planting adjoining the eastern access way which will enhance public enjoyment of the Port Hills environment. The access affords extensive views into Bowenvale Valley, Huntsbury Spur and the open Port Hills landscape, the city and Pegasus Bay beyond.
- It is also intended to vest in the Council land adjacent to the Telecom site in order to provide a further degree of separation between the Telecom facilities and any residential development.

A submission will be filed on Stage 2 of the pRDP seeking RLL zoning for the Site.

#### Suitability for Residential Development

Attached as **Appendix B** is a letter from Fox Surveyors which confirms that there are no servicing constraints to development of the Site at either RLL densities (approximate yield 10-12 sections).

Tonkin and Taylor have undertaken a preliminary 'walk over' of the Site and advise that there are unlikely to any geotech or other natural hazard constraints to development of the Site, under the provisions of s106 of the Resource Management Act 1991 (see **Appendix C**).

#### Landscape and Natural Values

Andrew Craig, landscape architect has assessed the landscape and natural values of the Site (see **Appendix D**) and concluded that favourable conditions exist on Site for prospective rezoning with respect to— contiguousness, remediation, modest size, the lack of significant site features, good access and the enhancement opportunity involving planting most of the site with indigenous re-vegetation. Further enhancement as a result of the proposed rezoning of the Site will accrue from the removal of the pine plantation thereby

improving landscape coherence and consistency – that is, adopting the prevailing land cover character of both the urban and rural environments.

It is noted that the chief cost is lessening of the ONL, where in this case the primary landscape value is loss of vegetated open space. However, it is considered that this is not of a particularly high quality due to the presence of pine plantation which almost entirely occupies the site. Further, the area lost from the ONL will be small relative to its overall extent.

Andrew Craig considers that there will be no adverse amenity effects arising from development following re-zoning. The reason is that modern housing on large lots will be high quality. The large lots will further enable large scale planting which will further provide amenity.

Overall, it considered that the land use and its effects arising from the proposed re-zoning will, on balance, be appropriate in landscape terms given the circumstances discussed above.

#### Relevant Objective and Policy Framework

Objective 6.2.1 of Chapter 6 of the Regional Policy Statement ('C6'), (Appendix 1 of the LURP) is:-

*Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that:....*

*(4) protects outstanding natural features and landscapes including those within the Port Hills from inappropriate subdivision, use and development.*

The Operative City Plan identifies the distinctive natural and landscape features of the Port Hills, as outstanding and of national importance. The proposed Christchurch Replacement District Plan (pRDP) chapter relating to Natural and Cultural Values will be notified as part of Stage 3, in July. It is expected that the 'rural' Port Hills will continue to be identified as outstanding.

The proposed zoning is consistent with C6 and pRDP objective and policy framework with respect to the Port Hills which seek to ensure that development of greenfield land has a backdrop of a natural landform or vegetation; avoids buildings and structures on significant and outstanding skylines; is of a density that provides ample opportunity for tree and garden planting to reduce the visual dominance of buildings within the hillside landscape; integrates well with existing residential areas and where possible provides connections to public open

space; and where adjoining significant and outstanding natural landscape, remains compatible with these areas (Appendix E) The concept of environmental compensation is to be applied, where net benefit would arise from a subdivision proposal occurring within outstanding natural features and landscapes, as is the case here.

#### Canterbury Regional Policy Statement Chapter 6 Policy Amendment: Minor Changes to Greenfield Priority Areas

Chapter 12A of the RPS, which preceded Chapter 6 ('C6') included Policy 12: Resolution of Urban Limits. This provided for minor changes to urban limits at the time of rezoning land and preparing an ODP (see **Appendix F**). Policy 12 was not included in the LURP version of the RPS (Chapter 6) for unknown reasons.

It is essential there is flexibility in the application of the Urban Limit ('UL')/Greenfield ('GF') land policies to allow for minor urban extensions which are practical and appropriate and not of regional significance. The merits of such cases should be determined at the district level, including through the current Christchurch Replacement District Plan process. This may not be possible under the current RPS policy framework due the very specific wording of Policy 6.3.1 (see discussion below under 'Amendments to LURP').

The RPS is generally understood to be a 'higher order' strategic planning document and there are cases of landowners (including clients of Aston Consultants) who were not aware of, and hence, did not participate in the RPS review process (which was in any case 'truncated' by actions under Canterbury Earthquake Recovery Act legislation, including the LURP) in relation to the inclusion of their land as GF/within the UL.

The LURP Review should re-introduce a C6 policy which provides for minor changes to urban limits/GF areas. Suggested wording is set out under 'Relief Sought'.

#### Resource Management Act Section 32 'Test'

The current zoning and associated rules (Rural Port Hills, minimum lot size for subdivision and a dwelling 100ha) leaves small pockets of land such as the Site in limbo ....with no practical use and having negligible value. This 6.8ha is a small area of land that is not suitable for any agricultural use and then no form of housing or residential use is possible under the current planning rules.

If this land is not zoned for some sort of residential development then it will continue to remain a site with no use and of limited value. The site can easily developed to reflect the principles of the Urban Design Protocol with values of character, context, connectivity etc, as is per the proposed development concept (**Appendix A**).

The proposed RLL rezoning and development concept is the most appropriate way to achieve the purpose of the Resource Management Act, including in terms of its efficiency and effectiveness compared to retaining the current Rural Port Hills zoning.

#### Earthquake Recovery and the Christchurch Replacement District Plan

The Christchurch Operative District Plan is currently under review, under the Canterbury Earthquake Recovery Order 2014. The Schedule 4 Statement of Expectations includes that the Replacement Plan:

*(c) provides for the effective functioning of the urban environment of the Christchurch district, reflecting the changes resulting from the Canterbury earthquakes, including changes to population, land suitability, infrastructure, and transport:*

*(d) facilitates an increase in the supply of housing, including by—...*

*(ii) ensuring that the district plan has capacity to accommodate up to 23 700 additional dwellings by 2028 (as compared with the number of households in the 2012 post-earthquake period); and...*

*(iv) having regard to constraints on environmental and infrastructure capacity, particularly with regard to natural hazards; and*

*(v) providing for a wide range of housing types and locations:*

*(e) ensures sufficient and suitable development capacity and land for commercial, industrial, and residential activities:*

All aspects of the District Plan are under review, including provisions relating to the Port Hills residential areas. The Review is being undertaken under special streamlined and accelerated legislation promulgated to address planning needs arising as a result of the recent earthquakes. By definition, all elements of the Review are 'earthquake related'.

With respect to housing, provision is to be made for a wide range of housing types and locations, not just smaller more affordable housing in existing areas (to be facilitated through infill and intensification), which appears to be a focus of the LURP Review<sup>1</sup>.

The accelerated process is to provide a rapid solution to the destruction of housing stock in a way that also provides an appropriately managed choice of living styles for displaced communities. There have been numerous high quality houses in the Port Hills area (particularly towards Sumner), which have been 'red zoned' and where rebuilding is not permitted. Rezoning for replacement housing on the Port Hills in suitable locations (such as

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<sup>1</sup> LURP Review pages 1 and 6

the Site) is appropriate. Whilst there are a number of other not fully developed areas of RLL zoning on the Port Hills, a choice of areas is appropriate, as the timeframes and development aspirations of different landowners will mean that not all land zoned will necessarily be available for development in the immediate term.

It is the intention of CCHL to commence residential development as soon as the RLL zoning is confirmed.

### Amendments to the LURP

The purpose of the LURP is to help achieve the vision of the Recovery Strategy for Greater Christchurch by providing direction for residential and business land use development to support recovery and rebuilding across metropolitan greater Christchurch in the next 10–15 years.<sup>2</sup>

No person must make a decision or recommendation that is inconsistent with the Recovery Plan<sup>3</sup>.

A district plan must give effect to a regional policy statement.<sup>4</sup>

Amendments to the LURP which includes C6 of the RPS (Appendix 1) may be necessary to enable the above development proposal to proceed. This is by virtue of Policy 6.3.1 (4) which is “*ensure new urban activities only occur within existing urban areas or identified greenfield priority areas as shown on Map A*”. The Site is not a greenfield priority area or existing urban area. Further, Policy 6.3.6 (b) requires that development within greenfield areas in Christchurch City achieves a residential net density of 15 households per ha average over the whole of an Outline Development Plan (ODP) area (ODPs for greenfield areas are required under Policy 6.3.3). The RLL zone will not achieve the required density, if the Site is included as a greenfield priority area on Map A.

However, the proposed amendment to the Port Hills urban/rural boundary is of a minor nature which is not of regional significance and is therefore not inconsistent with the LURP and will give effect to C6.

The matter of ‘consistency’ with the LURP is addressed in the pRDP Strategic Directions and Outcomes Decision. The Panel found that:-

*Even where the Replacement Plan is dealing with the same subject matter as provisions of the LURP, the Replacement Plan is not required to treat the subject matter in precisely the*

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<sup>2</sup> LURP Executive Summary page 6

<sup>3</sup> Section 23 Canterbury Earthquake Recovery Act 2011

<sup>4</sup> Section 75 3c) Resource Management Act 1991

same way. 'Not inconsistent with' is a phrase that provides reasonable allowance for interpretation and judgement as to how it should be applied in the context.<sup>5</sup>

Notwithstanding the above, for the avoidance of doubt, amendments to the LURP are requested to give effect to this Comment as follows:-

- 1) Amend Map A of Chapter 6 of the Canterbury Regional Policy Statement (Appendix 1 of the LURP) by inclusion of the Site as a 'Port Hills Greenfield Residential Area'.
- 2) Amend Policy 6.3.7 (3) (b) as follows (amendments in bold and underlined):-

*(3) Intensification developments and development in greenfield priority areas shall achieve at least the following residential net densities averaged over the whole of an ODP area (except where subject to an existing operative ODP with specific density provisions):*

*(a) 10 household units per hectare in greenfield areas in Selwyn and Waimakariri District;*

*(b) 15 household units per hectare in greenfield areas in Christchurch City, **excluding Port Hills greenfield priority areas;***

- 3) Add to Policy 6.3.7 (b) Principal Reasons and Explanations:

**With respect to the Port Hills Greenfield Priority Areas, the appropriate residential density will be determined by the district plan, having regard to the existing pattern of zoning and development and the need to ensure development complements the natural landform and character of the Port Hills.**

- 4) Add new Policy 6.3.11 as below and re-number existing Policy 6.3.11 as Policy 6.3.12.

**Policy 6.3.11 Minor Extensions of Greenfield Areas and Existing Urban Areas**

**(a) During the process of completing district plan changes or reviews (including privately requested changes), territorial authorities may make minor amendments to provide for urban zoning outside the Priority Greenfield Areas and existing urban areas shown on Map A provided all the following conditions are met:**

**(i) Any proposed extension or reduction is of a minor nature, generally around 10 ha or less; and**

**(ii) Any additional land is contiguous with an existing urban areas or identified greenfield priority area as shown on Map A**

**Explanation:**

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<sup>5</sup> Replacement Plan Strategic Directions & Outcomes Decision paragraph 61

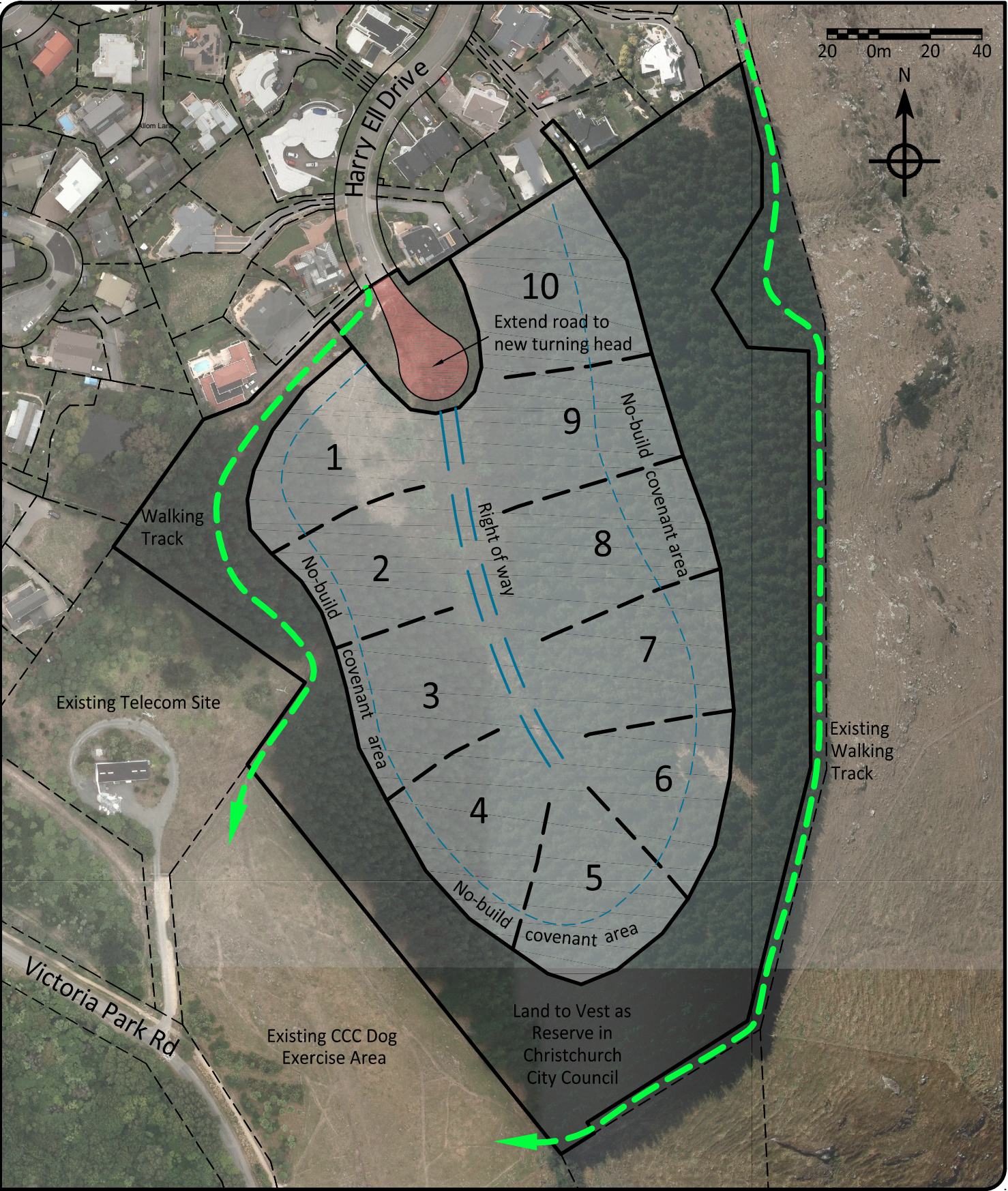
**This policy confirms the requirement for urban development to be contained within the Greenfield Areas shown on Map A, but provides for minor extensions to Greenfield Areas or existing urban areas. In such cases, the territorial authority will determine whether an Outline Development Plan is necessary having regard to the purpose and content of Outline Development Plans as set out in Policy 6.3.3. Policy 6.3.7 will apply on the basis that the urban extension(s) are classed as 'greenfield areas'.**

- 5) Such additional, alternative or consequential relief as will give effect to the intent of this Comment.

## **Appendices**

- Appendix A Development Concept
- Appendix B Letter from Fox & Associates re Servicing
- Appendix C Letter from Tonkin & Taylor re Site Suitability in relation to Natural Hazards
- Appendix D Landscape Assessment (Andrew Craig)
- Appendix E Relevant Replacement Plan Objectives and Policies
- Appendix F Chapter 12A Policy 12 Resolution of Urban Limits

## **Appendix A: Development Concept**



# Concept Plan for Rezoning of 6.8ha Site

68 Harry Ell Drive, Cashmere  
 Pt Lot 1 DP 11796



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 P.O.Box 895  
 CHRISTCHURCH

Scale		1:2,000	Job No 0590C.01  Rev. 0
Designed		DOF	
Drawn		PRD	
Date		28/05/15	

**Appendix B: Letter from Fox & Associates re  
Servicing**



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**To the Hearings Panel**

## **LAND USE RECOVERY PLAN**

## **CONCEPTUAL DESIGN AND SERVICING OF SITES**

**For:** Cathedral City Holdings Ltd (CCHL)

**Date:** 29th May 2015

**Prepared by:** David Fox - Surveyor and Land Development Consultant

### **INTRODUCTION**

I was responsible for the design and development of the 100 or so sections adjoining Harry Ell Drive back in the 1980's.

Harry Ell drive was constructed up to the rural zone boundary that existed at that time and which is still the residential /rural zone boundary at this point in time.

The balance land beyond the end of Harry Ell Drive is just a small block of land 6.8ha that is zoned rural. A cul-de-sac turning head was never constructed when we were undertaking the residential development back in the 1980's because it was envisaged by both CCHL and the Council obviously that Harry Ell Drive would be extended for some sort of residential use.

This 6.8ha site is not suitable for any valid or useful agricultural activity. It would be a sheer waste of resources for this land asset to just sit as waste land and not be used for some productive purposes. I believe that the conceptual proposal that we have produced for this land is the best use to which it could be put.

#### **1. Development Concept**

The intention is to extend Harry Ell Drive some 40 to 50 meters further up the slope and construct a turning head so that traffic on this road can turn in a normal traffic movement fashion.

A wide right of way could be constructed into the centre of the area identified for residential purposes. The right of way would be generous in width and have a very easy gradient.

The house sites would need to be located within a defined central portion of the site. The residential large lot (RLL) zoned sites would leave plenty of space for extensive and major planting.

A significant strip of land around the perimeter of this 6.8ha site would be gifted to the Council and this would enable a high degree of connectivity between the adjoining properties and pedestrian networks in the wider area.

## **2. Services**

Enquiries were made at the City Council as to what the position was with services. I can confirm that both sewer capacity and domestic water supply services are available to serve this minor residential development. Storm-water treatment and storm-water disposal can be addressed on site. In summary the proposed development can be fully serviced.

## **3. Geo-tech and Landscape issues**

A geo-tech consultant was engaged to provide a brief report on a site which clearly has no geo-technical issues .... he agreed this was so.

The landscape architects rather complex report came to the conclusion that there is no reason from a landscape point of view why the development should not proceed.



**David Fox**

Director

Fox & Associates Ltd

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**Appendix C: Letter from Tonkin & Taylor re Site  
Suitability in relation to Natural Hazards**

Fox Associates  
Po Box 895  
Christchurch, 8140

Attention: David Fox

Dear David

**Geotechnical Opinion for Plan Change Submissions. Harry Ell Drive,  
Cashmere**

This letter provides Tonkin & Taylor's preliminary opinion on geotechnical and slope hazards issues related to the possible subdivision of land owned by Cathedral City Developments Ltd at the south end of Harry Ell Drive, Cashmere. T&T's opinion was requested by David Fox of Fox Associates, with respect to proposed plan change submissions.

The parcel of land (Pt Lot 1, DP11796, 6.8003ha) is a triangle approximately 300m wide by 300m long, approximately defined by an area of pine tree plantation south of Harry Ell Drive.

We are familiar with the subject land which is bounded on the west by the Victoria Park dog park and the east by a public walkway along the crest of the western side slope of Bowenvale Valley. The land slopes gently down to the east and northeast from the crest of the main Victoria Park ridge line. Loess soil overlies volcanic rock on the 1(V):4(H) to 1(V):10(H) slopes. An incised erosion gully drains from southwest to northeast across the middle of the site.

There are no existing rock fall, or medium to large landslide hazards evident on, or adjacent to the site. Normal Port Hills slope hazards including loess soil erosion (tunnel gully), areas of seepage, and small scale landslip can all be mitigated by civil engineering design that follows the principals of 'good hillside practice' for cuts, fills, drainage and retaining structures.

In T&Ts' opinion the proposed development is feasible from a geotechnical perspective. We expect, subject to an appropriate assessment, that a properly engineered development will meet the test of Section 106 of the RMA, in being 'not likely to accelerate, worsen or result in material damage to the land'.



This letter has been prepared for the benefit of Fox Associates with respect to the particular brief given to us and it may not be relied upon in other contexts or for any other purpose without our prior review and agreement.

Yours Sincerely



Barry McDowell

Senior Engineering Geologist

Reviewed for Tonkin & Taylor Ltd by:

Grant Lovell

Principal, Business Leader - Land

MIPENZ, CPEng (Civil & Geotech)

28-May-15

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## **Appendix D Landscape Assessment (Andrew Craig)**

## LAND USE RECOVERY PLAN REVIEW – LANDSCAPE ADVICE

**For:** Cathedral City Holdings Ltd  
**Date:** 29 May 2015  
**Prepared by:** Andrew Craig – Landscape Architect

### INTRODUCTION

The landholder seeks to rezone for low density (10 x 1500m<sup>2</sup> lots) residential purposes land currently zoned Rural Port Hills.

The 6.8 hectare site is located above the existing residential area at Cashmere. The land is currently zoned rural with an 'Outstanding Natural Landscape' overlay.

Vehicle access is via Harry Ell Drive. Pedestrian access is from adjoining Elizabeth and Victoria Park. A public walkway runs along the eastern boundary of the site.



**Figure 1** *The site – within yellow dashed line – at the top end of Cashmere as viewed from the Central City.*

### What is the landscape character of the existing environment?

The landscape character of the site is summarised as follows:

- 1 The site is entirely rural as it is devoid of any buildings or any other significant structures.
- 2 Landcover (vegetation) is entirely exotic comprising mostly pines (*Pinus radiata*), Rank grass and woody weed species (broom for example) are also present – see Figure 2 photograph.



**Figure 2**      *Landcover within the site.*

- 3 Native vegetation is present but very scant (mostly Karo - *Pittosporum crassifolium*).
- 4 Physical features include boundary fences, a short formed vehicle track and walking tracks.
- 5 Arising from the above points the landscape of the site is modified to a moderate degree, and therefore exhibits moderately high natural character.
- 6 There are no significant natural features within the site such as salient rock outcrops, water courses or bodies and native vegetation.
- 7 Topographically the site is more or less located at the apex of the Cashmere Spur. Land gradient steepens markedly to the east and flattens to very gentle gradients toward the apex.

- 8 There are no recognised (in the operative City Plan and proposed Replacement Christchurch District Plan) heritage features (buildings, sites or trees) and no significant ecological sites.
- 9 Amenity is moderate on account of rural character, moderate naturalness, open space and vegetation.

### **Are there any landscape constraints?**

As mentioned, there are no significant or salient landscape features within the site. None of the vegetation is significant or important – indeed the prevailing pine forest degrades landscape character and amenity.

Also as mentioned, the site is regarded as part of a wider ONL overlay that applies to most of the Port Hills rural area. Rezoning for residential purposes will result in the irrevocable loss of that part of the ONL comprising the site. In my opinion the landscape character of the site is such that its contribution to the overall ONL is at the low end. That is, other parts of the ONL where rock outcrops, remoteness, native vegetation and distinctiveness are more significant compared to current site conditions.

### **What are the relevant Christchurch Replacement District Plan objectives and policies?**

In the following discussion the objectives and policies relevant to landscape outcomes of the Christchurch Replacement District Plan are identified and briefly considered.

#### Replacement Plan (version dated 14/5/15)

##### *8.1.1 Objective Natural and Built Environments*

*a. Significant natural features, landscapes, indigenous biodiversity and ecosystems, springs, significant trees, and historic heritage are protected or enhanced through the subdivision process.*

It is apparent that regarding the listed features the Objective does not preclude the possibility of subdivision involving the features listed. Of these the only one of relevance is the ‘...landscapes ...’ as all others are absent from the site. The effects on the ONL will be discussed next as this is a concern raised in the following policy.

##### *8.1.1.1 Policy – Natural features and landscapes*

*a. Ensure that subdivision and associated works shall achieve the long term protection and enhancement of:...*

*ii. outstanding natural features and landscapes, significant features and landscapes, important ridgelines;*

The ONL component of the site will be diminished as will its naturalness due to the introduction of residential activity. Or to put it another way, the site will be further modified. It is my opinion that the landscape effects are not just confined to the site; that is the wider context of the site is an important consideration. Within that (the Rural Port Hills) the site is relatively insignificant arising from its modest extent (6.8ha). Further it is contiguous with the existing residential area and so will appear as a relatively minor extension to it. Or to put it another way, the site is not an isolated entity within the rural Port Hills. Nonetheless, I acknowledge that diminishment of the ONL is a landscape cost. I further understand, regarding RMA s6(b), that subdivision within ONLs can be entertained provided it is not inappropriate.

The policy however, is not only concerned with protection, but also enhancement. Enhancement will result via a remediation process entailing the removal of the existing pine plantation. Further enhancement will involve the creation of a native vegetation buffer enclosing the site along its rural boundary.

*iii. significant indigenous vegetation and / or indigenous fauna, including sites of ecological significance.*

None of the features listed exist on site.

#### *8.1.1.3 Policy - Environmental Compensation*

*a. Apply the concept of environmental compensation where net benefit would arise from a subdivision proposal occurring within outstanding natural features and landscapes, significant natural features and landscapes, sites of ecological significance, and in relation to heritage items and settings, and significant trees.*

The ‘...*net benefit*...’ will result from the aforementioned native vegetation buffer and the removal of the pine plantation mono-culture. This will result in enhancement of the existing

walkway along the eastern boundary of the site and proposed pedestrian access linking Elizabeth Park (and ultimately Victoria Park) with Harry Ell Drive.

#### *14.1.5.7 Policy - Residential development on the Port Hills*

*Ensure that the development of greenfield land on that part of the Port Hills facing the Christchurch main urban area complements the natural landform and character of the hillside by ensuring that development:*

*(i) has a backdrop of a natural landform or vegetation when viewed from the flat land and coastline/coastal environment;*

The landscaped buffer will provide a vegetated backdrop. Selected pines will be retained however to ensure such a backdrop exists from the outset of development while the native planting matures.

The landform backdrop will exist from most vantage points, but it is acknowledged there will be some points from where dwellings will intrude the skyline. To help minimise this potential effect, future home owners will be required to locate dwellings away from the spur apex.

*(ii) avoids buildings and structures on significant and outstanding skylines;*

The most important Port Hills skyline is that of the summit ridge as it forms the backdrop to the City. Many spurs radiate from the ridge including that of Cashmere. It too is an important ridge<sup>1</sup> but not to the same degree as that of the summit. As for all spurs their landscape significance lessens more or less in correspondence with decreasing elevation. Or to put it another way, the landscape generally becomes increasingly modified, particularly on the spurs where most Port Hills residential activity occurs.

*(iii) is of a density that provides ample opportunity for tree and garden planting to reduce the visual dominance of buildings within the hillside landscape*

The 10 large lots proposed (1500m<sup>2</sup>) in combination with buffer planting of the balance land (4.8ha) will enable and therefore ensure there is ample opportunity for tree and garden

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<sup>1</sup> The Banks Peninsula section of the operative City Plan specifically identifies on its planning maps important ridges. These however are outside of the area of concern.

planting, thereby reducing building dominance. This effect will improve as vegetation matures over time.

*(iv) integrates well with existing residential areas and where possible provides connections to public open space;*

The site is contiguous with the existing residential area and so will be integrated with it. Site design will include the aforementioned walkways which will connect others beyond the site. Vehicle access will involve cul de sac extension of Harry Ell Drive thereby formally terminating the road.

Further integration will involve the native buffer planting reinforcing that in the adjoining Elizabeth Park and Victoria Park beyond.

*(v) has regard to the location and scale of the principle building to reduce its visual dominance on the landscape;*

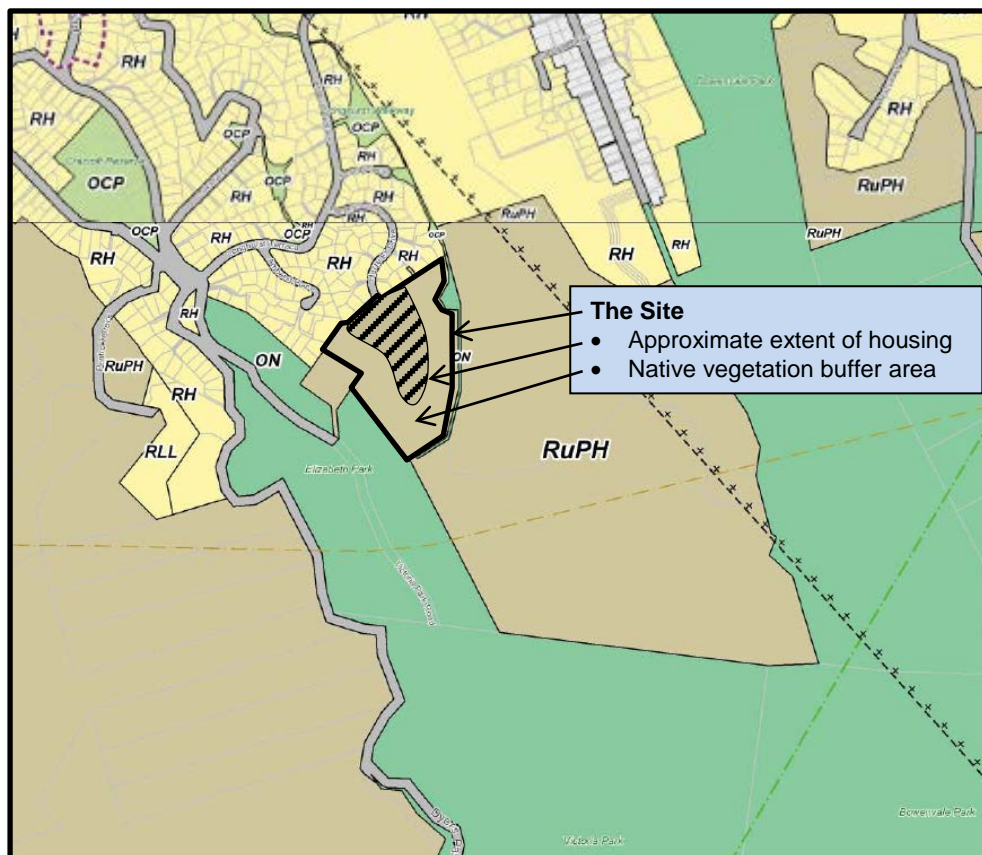
Principal buildings will be the dwellings. The site plan has been designed in such a way that these are optimally located so as to minimise potential adverse effects. At the subdivision stage this will include the identification of building platforms so as to ensure desired outcomes are achieved.

*(vi) if adjoining significant and outstanding natural landscape, conservation and biodiversity areas, remains compatible with these areas; and*

*(vii) where possible provides access to mahinga kai and places of cultural significance.*

The relationship between the proposed residential zone and surrounding rural ONL land will fundamentally remain the same as the current situation – that is; residential activity abuts the rural ONL. The only difference is that the boundary is shifted, while in generic terms the adjoining activity stays the same.

Nearby places of cultural significance – Elizabeth, Victoria and Bowenvale Parks and Cracroft Reserve (incorporating the *Sign of the Takehe*) will access enhanced due the presence of existing and proposed pedestrian access through the site – see Figure 3 map below.



**Figure 3**      *The location of the site is identified on the above combined Stage 2 Planning Maps 46 & 51*

## What are the landscape advantages and disadvantages?

In the following discussion the advantages (benefits to the landscape) and disadvantages (costs to the landscape) of re-zoning are identified and considered.

### Advantages

#### 1      *Remediation*

The current land use is entirely devoted to exotic pine plantation forest. This is a mono-culture that is not conducive to providing for native fauna; particularly birds such as bellbird and wood pigeon which occur in the area. Re-zoning would result in removal of the pine plantation and introduction of native vegetation (in the form of a managed transition) within the buffer area surrounding the site along its rural boundary. This buffer would be vest in Council therefore providing a permanent unassailable urban / rural boundary. Residential activity will also

result in diverse vegetation which better serves wildlife than the current pine plantation.

2 *Enhancement*

Removal of the pine plantation to be replaced by low density housing will better achieve the contrast between rural and urban Port Hills landscape. This will also aid apparent coherence of both the rural and residential environments where the quality of each is defined by the contrast between them.

The native plantings within the buffer area will extend and reflect existing patterns of native vegetation occurring in nearby Victoria Park.

3 *Contiguity*

Future dwellings will be contiguous with the existing residential area and so will appear as a continuation of it. Consequently current development patterns will be maintained, even though their extent is altered. For this reason residential activity within the site would not be unexpected – that is, it would not be out of keeping with existing patterns. Consequently there would be little or no adverse associative effect.

4 *Pedestrian access*

An existing pedestrian accessway exists along the east boundary of the site. Subdivision will include additional pedestrian access alongside the northern boundary linking Harry Ell Drive to Victoria Park. The combination of these walkways with the native planting within the buffer area will enhance people's appreciation of the Port Hills environment and the presence of wildlife while better enabling recreation.

### Disadvantages

1 *Diminished Outstanding Natural Landscape*

The subject site is currently within the Rural Port Hills zone which carries an 'Outstanding Natural Landscape' (ONL) overlay. It is therefore subject to RMA s6(b) which seeks protection of such landscapes from inappropriate subdivision, use or development. Rezoning will result in a relatively minor reduction of the ONL area.

2 *Diminished rural area*

As for the ONL, rezoning will result in some loss of the rural landscape. This will be confined to the new lots, and excludes the proposed buffer area which will remain rural in character.

3 *Skyline intrusion*

From certain vantage points dwellings will intrude the skyline. This effect currently occurs in many areas throughout the Port Hills.

## **Conclusion**

In landscape terms there are clearly costs and benefits arising from the proposed re-zoning. As is the case with all land use proposals, context is the key consideration. As identified and considered in the foregoing discussion it is evident that there exist favourable conditions – contiguousness, remediation, modest size, the lack of significant site features, good access and the enhancement opportunity involving the planting most of the site with indigenous re-vegetation. Further enhancement will accrue from the removal of the pine plantation thereby improving landscape coherence and consistency – that is, adopting the prevailing land cover character of both the urban and rural environments.

The chief cost is lessening of the ONL, where in this case the primary landscape value is loss of vegetated open space. As mentioned, this is not of a particularly high quality due to the presence of pine plantation which almost entirely occupies the site. Further, the area lost from the ONL will be small relative to its overall extent.

There will be no adverse amenity effects arising from development following re-zoning. The reason is that modern housing on large lots will be high quality. The large lots will further enable large scale planting which will further provide amenity.

Overall, it is my opinion that the land use and its effects arising from the proposed re-zoning will, on balance, be appropriate in landscape terms given the circumstances discussed above.

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Landscape Architect  
29 May 2015

## **Appendix E Relevant Christchurch Replacement District Plan Objectives and Policies**

## **Replacement Plan (version dated 14/5/15)**

### **8.1.1 Objective Natural and Built Environments**

a. Significant natural features, landscapes, indigenous biodiversity and ecosystems, springs, significant trees, and historic heritage are protected or enhanced through the subdivision process.

#### **8.1.1.1 Policy – Natural features and landscapes**

a. Ensure that subdivision and associated works shall achieve the long term protection and enhancement of:...

ii. outstanding natural features and landscapes, significant features and landscapes, important ridgelines;

iii. significant indigenous vegetation and / or indigenous fauna, including sites of ecological significance.

#### **8.1.1.3 Policy - Environmental Compensation**

a. Apply the concept of environmental compensation where net benefit would arise from a subdivision proposal occurring within outstanding natural features and landscapes, significant natural features and landscapes, sites of ecological significance, and in relation to heritage items and settings, and significant trees.

#### **14.1.5.7 Policy - Residential development on the Port Hills**

Ensure that the development of greenfield land on that part of the Port Hills facing the Christchurch main urban area complements the natural landform and character of the hillside by ensuring that development:

- (i) has a backdrop of a natural landform or vegetation when viewed from the flat land and coastline/coastal environment;
- (ii) avoids buildings and structures on significant and outstanding skylines;
- (iii) is of a density that provides ample opportunity for tree and garden planting to reduce the visual dominance of buildings within the hillside landscape
- (iv) integrates well with existing residential areas and where possible provides connections to public open space;
- (v) has regard to the location and scale of the principle building to reduce its visual dominance on the landscape;

- (vi) if adjoining significant and outstanding natural landscape, conservation and biodiversity areas, remains compatible with these areas; and
- (vii) where possible provides access to mahinga kai and places of cultural significance.

## **Appendix F: RPS Chapter 12A Policy 12: Resolution of Urban Limits**

(a) During the process of completing district plan changes and Outline Development Plans, territorial authorities may make minor amendments to provide for urban zoning outside the Urban Limits shown on Map 1 provided all the following conditions are met:

- (i) Any proposed extension or reduction will not change the Outline Development Plan area by more than 5 %; and
- (ii) Any additional land is contiguous with the Outline Development Plan area; and
- (iii) Economies of scale or other efficiencies for infrastructure would arise; and
- (iv) All other provisions of Policy 8 are met.

Explanation:

This policy confirms the requirement for urban development to be contained within the Urban Limits, but provides for minor amendments to the Urban Limits at the time of preparing an Outline Development Plan and changing the district plan in accordance with Policy 8.