

SUBMISSION ON PROPOSED CHRISTCHURCH REPLACEMENT DISTRICT PLAN

To: District Plan Submissions
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Submitter: **HORNCastle HOMES LIMITED**

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Name of submitter

Horncastle Homes Limited ('Horncastle') hereby submits in opposition (in part) and support (in part) on the Christchurch Replacement District Plan (CRDP).

The submitter is a well-known Christchurch based residential building company.

Trade competition

The submitter could not gain an advantage in trade competition through this submission

Parts of the Proposed Replacement Christchurch District Plan that this submission relates

The submission relates to the entire CRDP where it concerns residential development and housing but with specific emphasis on:

- Chapter 3 - Strategic Directions;
- Chapter 8 – Subdivision; and
- Chapter 14 – Residential.

Discussion

Horncastle is broadly supportive of the strategic directions proposed including those with regard to housing (clause 3.4.1.1), providing for a range and choice of housing (clause 3.5.2.3), residential amenity (clause 3.4.4.4), and housing affordability (policy 3.6.1.2). Horncastle wishes to ensure that the underlying methods and regulations proposed to achieve these directions are practical, reasonable, affordable, provide certainty and do not result in unnecessary or unjustified cost, time delays and administration in their implementation. This in particular includes (but is not limited to) provisions related to lifemark ratings, energy and water efficient standards, noise insulation, and urban design requirements.

Horncastle is supportive of the increased opportunities for housing proposed through the density provisions in the Residential Chapter and the increase in medium density zoning around some of the larger suburban commercial centres. A number of these increased housing opportunities are however subject to extensive lists of criteria that in practice are likely to mean that take-up of such opportunities is extremely limited. The criteria need to be pragmatic and enabling of increased opportunities in high amenity locations where the market will support good quality higher density development.

Horncastle is opposed to the increase in activity status for general subdivision from being a controlled activity in the operative Plan to a restricted discretionary activity in the proposed plan. Subdivision is a normal and anticipated activity that is inherent with the provision of additional housing. Provided sites can be adequately serviced, and any subdivision application complies with any site-specific rules, then controlled activity status is considered to be adequate for managing effects. Subdivision in Liquefaction areas 1 & 2 identified in the Natural Hazards Chapter should likewise be a controlled activity where such subdivision occurs within an urban zone, with foundation design issues able to be considered through subdivision consent conditions and the Building Consent processes. The rule framework for new residential units in flood hazard areas likewise needs to be pragmatic, especially regarding the need for recession plane and height limits to recognize the need to raise floor levels.

Horncastle also wishes to ensure that the ability for residential development and subdivision to be undertaken does not become unduly onerous and in particular does not reduce or further restrict the regulatory framework applying to existing greenfield subdivisions beyond their existing applicable provisions.

Horncastle also seek one site specific change to the CRDP. This concerns the ex 'Orion site' otherwise known as the block bounded by Packe Street, Purchas Street, Madras Street and Canon Street. Development of this block is currently subject to a restricted discretionary status and required to be developed in accordance with an outline plan contained as an Appendix within the operative Plan. This outline plan is now outdated. In addition, the land

ownership has now changed and become fragmented between multiple parties. It is therefore very unlikely that this block would ever be developed in accordance with this particular outline development plan yet these provisions have been carried over to the proposed CRDP. Its retention within the CRDP is therefore opposed in the interests of reducing unnecessary planning obstacles and promoting long overdue development on this site.

Relief Sought

Horncastle wishes that the Plan be amended to address the matters raised in the above discussion. This includes the specific relief as follows:

- **Amend Rule 8.2.1.1 of Chapter 8 Subdivision to provide for subdivision as a controlled activity rather than restricted discretionary activity.**
- Delete Rule RD4 of Rule 14.3.4.1 Chapter 14 Residential.
- Delete associated Appendix 15.9.7 from Chapter 15 Commercial.

Conclusion

Horncastle **does** wish to be heard in support of this submission.

If others make a similar submission, the submitter will consider presenting a joint case with them at the hearing.

Updated 19 December 2014



Sam Flewellen
Senior Planner
on behalf of **Horncastle Homes Limited**