

**CHRISTCHURCH CITY COUNCIL
LONG TERM COUNCIL - COMMUNITY PLAN (LTCCP)**

SUBMISSIONS BY CHRISTCHURCH CIVIC TRUST INC.

1 BROAD RANGE COMMENTS/SUBMISSIONS

2 TARGETED COMMENTS/SUBMISSIONS

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Signature

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Christchurch Civic Trust**

The Civic Trust wishes to speak on the main points in this written submission at the hearings to be held between Tuesday 1 June and Friday 11 June 2004.

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TARGETED COMMENTS/SUBMISSIONS

Overlapping to some extent with the BROAD RANGE

COMMENTS/SUBMISSIONS of the Trust, the following more specifically targeted submissions are added:

INTRODUCTORY: In making these submissions the Civic Trust draws on inspiration from the recent Council's Central City Revitalisation Seminar (follow up from which the Trust anticipates being involved in). The Trust also draws on other, earlier, meetings, workshops and assessments which the Trust has either initiated or been involved in with members of the city community and experts in various relevant fields.

1. Liveability of the City

- 1.1 Various studies strongly suggest that if the liveability of a city is maximised the economic strength will be enhanced in tandem with enhancement of the city as an enjoyable living environment.
- 1.2 What happens at the heart of our city is influenced by what happens - and the way that occurs - further out from the heart and or beyond the periphery.
- 1.3 Liveability of Christchurch, in the broad sense, will be affected by the relationships between the urban form and the surrounding landscape within which it is located, held.
- 1.4 The landscape within which Christchurch occurs is different from that surrounding many metropolitan centres. Predominantly this city is on the flat plains. What holds it in are; the sea edge
the Port Hills
the western alps.

The Avon and Heathcote and their estuaries are very significant elements within (the City that Shines)

The trees, parks and the various scales of planting associated with the garden city image, help to shelter and provide the finer grained sense of "location" for the individual and collective built form.

1.5 As major contributors to the liveability of Christchurch, the Civic Trust advocates enhancement of the relationship between the city the surrounding landscape within which it is held via adoption, for future planning, of objectives of;

- a predominantly low rise city (which occurs within the average tall tree heights). Some carefully selected higher rise opportunities could be provided for but not to the extent of undermining the predominance and distinction of Christchurch as a low rise city of the plains.
- consistent with the above an emphasis on the importance of the main public open spaces, large and smaller, including those around the Avon and Heathcote and their estuaries, and on the quality of people's experience within these spaces, rather than an emphasis on the importance of people's experience in high buildings looking down on such open spaces.
- particular importance of low rise approach in heavily pedestrianised areas of Central Business and Retail District.

2. Liveability and Historic Heritage

2.1 Statistics suggest a very high level of citizen support for retention and enhancement of "historic heritage" (definition adopted from R.M. Amendment Act 2003) in all areas of the city. To cater for increased action in the wake of the enlarged definition by the RM Amendment Act, it is submitted the Council will need to allocate more staff and other resources. The City Plan will doubtless need Variations or Changes to meet the high level of both public and statutory expectations.

- 2.2 An important starting place for increased assessment work and follow up action relative to historic heritage, should be where the preponderance of relevant fabric and sites are situated, ie;
- in the area within the 4 Avenues, both CBD and Living Zones and
 - in the older suburbs nearest around the above or in early established suburban nodes.

3. Central City Revitalisation

- 3.1 The Central City Revitalisation programme deserve specific recognition and integration within the LTCCP.
- 3.2 Central City Revitalisation initiatives have, commendably, involved extensive consultation with residents in Living Zones within the 4 Avenues. However the Resource Management Planning Staff who focus and advise on Revitalisation are separate from the Planning Staff who are responsible for City Plan decisions which impact on the Inner City Living zones.

The Civic Trust submits that structural changes to the administration and management arrangements for staff within the Council are needed so that the Planning Staff involved in the above Central City Revitalisation, on the one hand, and in planning for the Living Zones, within the 4 Avenues, on the other hand, become integrated (or at least interconnected) without delay.

4. Liveability and Security

- 4.1 If the city is serious about encouraging increased residential density near and within the CBD then it is submitted that;
- within the CBD residential use may be expected to co-exist on, a check by jowl basis, with a reasonable range and diversity of other land use activities
 - in the Living Zones within the 4 Avenues the Trust submits a reduction in non-residential activities is needed to enhance the sense of security and confidence of residents in the medium and longer term viability of these areas as residential environments.
 - the more successful the implementation of a range of objectives for urban consolidation for Christchurch becomes, the more the pressure will result to

erode the coherence of the Living zones closet to the CBD. If that erosion occurs it will have a detrimental effect on liveability where the city most wants that sense of liveability to strengthen and gain momentum.

4.2 In line with the above but also in more general terms relative to:

- ensuring liveability and
- quality control of expected amenity values,

the Trust submits the Council allow, in its LTCCP, considerably more for monitoring and compliance with City Plan rules and especially of Resource Consent conditions imposed. The Civic Trust experience is that the Council's capacity in this area is currently inadequate and this will become much more noticeable in relation, for example, to historic heritage assuming much more of it is recognised and provided for following the R M Amendment Act 2003.

5. Capital Works Priorities

- 5.1 The Civic Trust submits that Council investigate options for reworking and retrofitting of existing buildings (possibly a thematically linked collection of them) as an alternative to an all new purpose built "iconic" structure for the Councils own needs. Further, the Trust urges the Council to consider leading by example, relative to Central City Revitalisation, with choice of site and integration or generation of new pedestrian friendly spaces around the eventual choice. Whilst the Trust would want the Council and staff to be comfortably and efficiently housed, it recommends investigation of the above, especially as it could well result in reduction of capital outlay.
- 5.2 The Civic Trust submits the budget allocation planned for a "flat water facility" is inappropriate at a time when other more fundamental infrastructural requirements are already straining the city's resources (eg Sewage outfall). Further the Trust advocates a review of any policies in place for deciding on which recreational pursuits will be catered for by Council and which not, at any given time. Greater equity as amongst different outdoor and recreational pursuits may be achievable (media reports indicate the number of people who would regularly use a flat water facility would be small relative to the capital cost).

- 5.3 In this context the Trust advocates more emphasis on what it suggests be regarded as a fundamental infrastructural requirement, namely conservation and enhancement of heritage sites and fabric. This will be critical to the longer term allure of the city on a continuing basis. The opportunity for a "flat water facility" could remain an option for us for a considerable time into the future. Retaining the magnetic interest, which the informed literature tells us our unique built heritage constitutes, will not remain an option unless we plan, coherently, to look after it and budget accordingly before its demise. This is not to knock the major work done in the city to establish a range of remarkable and successful facilities. This is a submission seeking realignment of priorities, at a time of high demand for capital, for a range of basic infrastructural requirements.

6. Waste Management and Disposal

- 6.1 Full support for proposal to recycle putrescibles. The Civic Trust believes people in the community are ready for this and would strongly support the process.

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BROAD RANGE COMMENTS/SUBMISSIONS

INTRODUCTORY COMMENTS

1. The Christchurch Civic Trust Inc (CCT) recognizes and applauds the considerable efforts made by the Christchurch City Council in responding to the requirement under the Local Government Act 2002 (LGA) to prepare a LTCCP to formulate desired community outcomes for the City that are identified as priorities relating to the future social, economic, environmental or cultural wellbeing of the community. It is noted that (a) the LTCCP is required by the LGA to cover a period of not less than 10 consecutive financial years; (b) not less than every 6 years community outcomes for the medium and long-term future must be identified; and (c) not less than once every 3 years a report must be produced on the progress made for achieving the stated outcomes.
2. A period of one month has been allowed for public consultation and comments on the following documents comprising the LTCCP:
 - Volume 1 – providing a summary of the Council's intentions;
 - Volume 2 – providing detailed information on the Council's plans;
 - Volume 3 – containing detailed accounting information and copies of the Council's significant financial policies; and
 - Two supplementary documents comprising the Metropolitan Christchurch Transport Strategy and the Solid and Hazardous Waste Management Plan.
3. These documents are of some considerable substance and complexity that make it difficult for the Civic Trust (and no doubt other bodies) to absorb comprehensively and comment constructively on the material presented within a month. However, for the time being, the Civic Trust has endeavoured to focus principally on the contents of Volume 1 and on the Metropolitan Christchurch Transport Strategy. For Volumes 2 and 3, which both focus on points of detail, it is suggested that the Council considers extending the period for comments by at least another month.

PRINCIPAL AREAS OF INTEREST OF THE CIVIC TRUST

4. In general terms, the Civic Trust is concerned with improving and regenerating the environment in places where people live and work in Christchurch and adjoining areas (greater Christchurch). That broad remit covers a wide range of more specific short, medium and long-term issues relating to the co-ordinated planning, development, enhancement and conservation of urban and rural areas and related infrastructure associated with the future social, economic, environmental or cultural wellbeing of the community.

SOME PRESENTATIONAL SUGGESTIONS

5. To assist in the understanding of the LTCCP, consideration should be given to the following points:
 - On the front covers of Volumes 1, 2 and 3 (and also, perhaps, on the inner title pages of each volume) there should be a brief sub heading indicating respectively the general matters covered i.e., *Summary of Intentions, Detailed Information on the Council's Plans, and Detailed Accounting Information and Financial Policies*;
 - Under *How to Use This Document* in Volume 1, it would be useful to include a section of *Definitions of Key Terms/Abbreviations* e.g. *Outcomes, Indicators, Performance Measures, Triple-bottom line management practice, MCTS, RLTS etc*;
 - It would greatly assist cross referencing for all principal sections of each volume to have a numerical or alphabetical marker (e.g. *A : Our Community Today*) and also, within each section, for every paragraph, table and figure to be appropriately sequentially numbered.

SOME KEY POINTS ON VOLUME 1 – OVERALL SUMMARY

5. The Overall Summary is seen to be a document of considerable importance as a basis for seeking, in broad terms, reasoned public views on desired future community outcomes. It is suggested that the consultation process be directed at Volume 1 in the first instance and, on the basis of comments received, a more detailed review could then be undertaken of the contents of Volumes 2 and 3 and the two supplementary documents relating to the *Metropolitan Christchurch Transport Strategy* and the *Solid and Hazardous Waste Management Plan*.
6. Referring now to the contents of Volume 1, the following comments are offered:

Christchurch Today

pp13 – 14 – *bullet points on ageing population* - the point might well be made that the trend to a higher proportion of elderly people can be expected to have significant implications regarding such matters as increased needs for social services; and reduced discretionary expenditures by senior citizens that could have knock on effects on future needs for retailing and other consumer services (See NZ Census of Population 2001 tables on household incomes.)

p15 – *bullet points on diminishing household sizes* – the implication this will have, inter alia, on increasing needs for new housing units should be mentioned.

p19 – *top bullet point on declining building consents* – the point might be made that a counter escalating trend is the decentralization of population to areas beyond city boundaries, with major implications in respect of extensions/upgrading of transport and other infrastructure services.

p22 – *third bullet point on retailing* – the point might be made that Christchurch City has the highest level of retail space per capita among all urban centres in NZ – about 28% higher than for Auckland.

Relationship of Community Outcomes to other Planning Documents and Processes

The following matters need consideration:

- p23 - under Schedule 10 of the LGA a long-term community plan must – to the extent determined appropriate by the local authority – *describe how the community outcomes relate to other key strategic planning documents or processes*. There is no substantive coverage of this key point, particularly with reference to the fact that initiatives have recently been taken by the CCC to formulate in association with other territorial authorities a long term Urban Development Strategy (UDS) for greater Christchurch. Nor has adequate reference been made to the much vaunted (and essential) Central City Revitalisation Project (CCRP). Both of these key strategic planning initiatives can be expected to have fundamental impacts on the medium-term proposals for outcomes now beginning to take shape under the LTCCP which covers a period of only 10 years.
- p23 – following the commentaries relating to *Identifying Community Outcomes and Relationship of Community Outcomes to Other Planning Documents* - or at some other appropriate location in the LTCCP - it is proposed that there should be a concise statement covering a definition of Key Indicators, the need for them and the principles for their selection and application. Some thoughts on such matters are:
 - Key Indicators comprise discrete areas of activity related to specified outcomes/objectives that a community wishes to achieve (e.g. *Participation in Arts and Cultural Activities*).
 - The extent to which specified outcomes/objectives are achieved in respect of each indicator requires the formulation and application of **Performance Measures** (e.g. standards, targets) that generally comprise:
 - (a) **Quantitatively based performance measures** of the degree to which, on the basis of statistical records, an assumed or approved objective is being achieved (e.g. number of traffic accidents); and
 - (b) **Qualitatively based performance measures** of the degree to which an assumed objective is, on the basis of "best judgment," being achieved (e.g. information collected by attitudinal surveys on levels of satisfaction with a specified public service).
 - There may be a hierarchy of performance measures relating to National, Regional and District indicators – some of which may overlap.
 - Performance measures should be applied in a consistent way on a planned recurrent basis (say 3 year cycles) in order to establish trends.

- The type and number of indicators and performance measures selected at any given time will depend on the availability of information from established data banks (e.g. Census tabulations, Health Board records etc) and also from "feedback" surveys by the Council and other community bodies.
- The extent to which performance measures can be applied and the collected data analysed will depend on the availability of human, fiscal and technical resources and on the timing of required outputs.

In respect of the long lists of various performance measures in Volume 2 - about 280 items - it is noted that there are many listed measures that appear to be statements of the status quo rather than been defined in specific terms as "yard sticks" for assessing the indications of performance.

For example:

| Reference Page of Vol 2 and Service Group | Currently Defined Performance Measures (expressed as general status quo statements) | Civic Trust Indicative Suggestions for Specifically Defined Performance Measures |
|--|--|---|
| p29 A broad range of public exhibitions and programmes is preferred | <i>The gallery is in the top five attractions for Christchurch residents to take visitors. At least 400, 000 people visit the gallery per year. Work by Canterbury artists is always on display.</i> | 1. No. of recorded visitors per annum. 2. No. of "special" art exhibitions per annum. |
| p39 Promote and advocate for heritage conservation, including facilitating conservation covenants and providing guidelines and articles. | <i>Reports and articles are prepared on request. Assistance with conservation covenants and conservation management plans is provided as required.</i> | 1. No. of conservation covenants agreed. 2. Money allocated as grants for heritage conservation. 3. No. of heritage conservation schemes completed by type. |
| p.39 Promoting the Central City as a place to be, including advocating on behalf of businesses and enterprises that are located there. | <i>Projects to be progressed or completed include the Turners and Growers site, Poplar and Ash Streets, and greening of the City/</i> | 1. Pedestrian counts along main shopping streets. 2. Value of new building consents in the Central City. 3. Opinion feedback from the business community, residents and visitors on their perceptions of the Central City as a "place to be." |
| p45 Staff are available to assist community individuals and agencies to participate in the social development of their communities | <i>Staff are engaged in projects, and are acting as social development agents within their communities.</i> | 1. Number of full time and part time Council staff engaged in community development activities. 2. Number of other agencies by type engaged in such activities. |

It would therefore be prudent to carefully review the number and definitions of the performance criteria having particular regard to the availability of reliable data sources; human, financial and technical resource needs; and the programming or work to complete the present LTCCP. Perhaps, an approach might be to trim the Indicators and Performance Measures to dual lists (a) of "key" – high priority - items for application for the first LTCCP in respect of which adequate data is currently available and (b) a "future" list of other desirable items to be used as and when the necessary resources can be made available. In short, for a "first run" LTCCP there must be a manageable process to produce credible results.

Community Outcomes for Christchurch

Some substantive points for consideration are:

- pp 24 – 28 : amend on each page the headings *Council Activity Groups* to *Council/Community Activity Groups* (so as to reflect the full intention of the LTCCP for co-ordination action by the Council and community groups).
- p24 - change *A Sustainable Natural Environment* to *A Sustainable Natural and Built Environment*. This proposed change reflects the obvious fact that Christchurch is a large city comprising a wide range of urban-related land uses and associated infrastructure systems, the quality and efficiency of which must also be sustained and improved. In that context, specific outcomes might include :
 - *Our city is planned to integrate existing and future development and associated infrastructure having regard to wider regional perspectives.*
 - *Our city recognizes the need for the conservation and appropriate use of heritage assets.*
- p25 - under *A Prosperous City - Outcomes*
 - reword first bullet point to read *Our people have access to adequate income, employment and other opportunities to contribute to the City's wellbeing.*
 - second bullet point amended to read *and enhancing our essential natural and built environment.*
 - third bullet point amended to read*based on a range of businesses and activities which.....*
 - under *Challenges and Opportunities* add *Provision of appropriate policies, incentives and support programmes.*
- p26 – under *A Well Governed City* the inclusion of the Art Gallery, Museum and Our City under *Council Activity Groups* is questioned.
- p26 – under *A City of Inclusive and Diverse Communities* amend the first bullet under *Outcomes* to read*identity and have equal opportunities to contribute.....*Also, under *Challenges and Opportunities* change the last bullet point to read*reduce social inequalities among all ethnic groups.*
- p27 – for *A Safe City*
 - under *Outcomes* change the second bullet point to read*and infrastructure, facilities and services maximize*

- under *Challenges and Opportunities* add a further bullet point to read ***Promote pedestrianisation in key activity areas.***
- under *Key Indicators* add ***Incidence of fires and other hazardous events.***
- p28 – for *A Cultural and Fun City*
 - under *Outcomes* change the second bullet to read ***....open space and natural and built environments support***
 - under *Council Activity Groups* add new bullet point ***....Cultural promotion programmes (e.g. the Christchurch Arts Festival).***
- p28 – for *A Liveable City*
 - under *Outcomes* change the first bullet point to read ***....Our people have access to an affordable range of housing of adequate standards and live.....*** Also, add a further bullet point to read ***....Access to conveniently located and well planned centres of employment, education, recreation and other focal points for community interaction.***
 - under *Outcomes* add a new statement to the effect that ***Our City provides a comprehensively planned transport system, related to a long-term development strategy, that – inter alia – provides safe and affordable access to transport for all sectors of the community; maximizes existing infrastructure and optimizes resources; and minimizes adverse effects on the environment.*** Such a statement reflects the vision set out on p12 of the Metropolitan Christchurch Transport Statement.
 - under *Challenges and Opportunities* add a new bullet point to read ***Provide opportunities and incentives for the development of new employment and other activity functions.***
 - under *Key Indicators* change the first bullet point to read ***Availability of new housing stock, housing affordability and housing occupancy conditions.*** Also, include ***Existing and future land availability for a range of urban land uses.***

Summaries of Major Proposals – pp 29 to 40

A number of comments are:

p29 – on *Proposed Major New Initiatives* – the table should give an indication of the target completion date for each of the listed projects and classify by the related main categories of outcomes (e.g. A Liveable City)

p29 – on *Botanic Gardens Investigation, Consultation and Master Planning* - should this not also include “long-term” proposals for Hagley Park (e.g. a review of the management plan)?

p31 – on *The Metropolitan Christchurch Transport Statement (MCTS) and Stage 1 Summary Report (SRI)* – the general goals set out in the Stage 1 Summary Report are supported, particularly with respect to early initiatives proposed for demand management and the creation of a transport system that is *part of an integrated planning framework*, a new initiative for which is the preparation of a long-term Urban Development Strategy. Some key points for consideration are:

For Coverage under the LTCCP

- The MCTS Stage 1 summary report assumes a 20 years planning horizon whereas the brief for the Urban Development Strategy (UDS) proposes a 20 – 30 years time span. A common time span is required.
- Given that the UDS will provide a “mainstream” process for deriving a long-term , spatially defined strategy for “greater Christchurch” in respect of future patterns of growth and key infrastructure services, it is advocated that **prior to the section in the LTCCP on the Metropolitan Christchurch Transport Statement** a succinct statement be included on the UDS itself, based on the UDS brief recently considered and endorsed by the Urban Planning and Growth Special Committee. Indeed, perhaps that brief could be issued as a supplementary statement for the LTCCP.

For the MCTS and UDS

The MCTS assumes that over the next 20 years the number of registered vehicles in metropolitan (greater) Christchurch could increase by 40 - 50%. This implies a “business as usual” trend and provides a justification for the earliest possible application of demand management measures. The Civic Trust draws attention to the need for greater awareness of the perceptions by well respected, high-profile bodies/institutions on the future potential global situation regarding oil reserves and consumption. The general conclusion seems to be that oil production has peaked and will henceforth trend along a downward path at an escalating rate. A Current view is that, accumulating shortages (and hence higher fuel costs) can be expected within the next 30 years. Whilst, hopefully, new sources and means of energy may compensate to some degree, a precautionary stand is advocated for planning the development of greater Christchurch.

p39 - on *the Art gallery, Museum and Our City* - the Civic Trust considers that the coverage in both Volume 1 and Volume 2 in respect of the Museum is very adequate as little meaningful information is given with respect to the future needs for provision of new facilities over the short, medium and long terms, also bearing in mind that the LGA requires the Council to *outline how the local authority will, to further community outcomes, work with other local organizations and regional organizations* - in this case with the Canterbury Museum Trust Board (CMTB) and adjoining district councils. It is understood that the current proposals by the CMTB for the in-situ selective redevelopment of the museum and the adjoining former Robert McDougall Art Gallery are likely to cost about \$30 million, of which about half is expected to come from the Government with the balance drawn from other statutory bodies within the Canterbury Region.

Bearing in mind that LTCCP is intended to be a forward looking statement of desired long-term outcomes and that the existing museum is a very key component of our City's heritage assets, the Civic Trust feels that the present draft LTCCP needs to be substantively modified to make general points of principle that any new proposals for additional museum facilities should

- (a) fully recognize and respect the great heritage value of the current museum and former Robert McDougall art gallery buildings and adjoining open spaces;
- (b) adequately explore the comparative merits of options for the provision of new facilities, including the full or partial relocation of museum activities to other suitable sites; and
- (c) give the community further open and adequate opportunities to consider new proposals.

p41- 42 – on *City Development* – the Civic Trust considers that the current summary statements under this head are somewhat short in substance and forward envisioning. Key points that need to be made are:

- there is a need for a hierarchy of spatial development land use – infrastructure plans covering :

In top down sequence

- greater Christchurch – as now proposed for the UDS and the MCTS;
- those areas within current City boundaries and any confirmed extensions thereto (e.g. Banks Peninsula);
- areas that fall within Community Board areas;
- neighbourhoods and local “action areas” therein; and

As stand-alone elements

- “special” amenity areas – including areas of high ecological, environmental, heritage value;
 - key economic facilities – especially for the long-term provision of port and airport facilities (along with associated infrastructure) and the safeguarding of such facilities against any adverse impacts that could arise from encroachment by incompatible development (e.g. residential development that within airport flight paths subject to high noise levels) – see also **other comments** below.
- within the framework of such plans – and also taking account of potential resource availability - there needs to be sets of programmes for the co-ordinated implementation of works by the appropriate government, regional and district service providers.

p49 – on *Library Services* - it is not clear whether any long-term assessment has been made of need for expansion/relocation of the Central Library.

Other comments - it is noted that Volume 1 does not cover summaries in respect of a number of items listed in Volume 2 pp 144 – 154 (e.g. Christchurch International airport; Lyttelton Port, Jade Stadium).