

## Response ID ANON-URZ4-5F1E-6

Submitted to Fast-track approval applications  
Submitted on 2024-05-03 09:54:34

### Submitter details

Is this application for section 2a or 2b?

2A

#### 1 Submitter name

Individual or organisation name:  
Daresbury Limited

#### 2 Contact person

Contact person name:  
James Milne

#### 3 What is your job title

Job title:  
Director

#### 4 What is your contact email address?

Email:  
s 9(2)(a)

#### 5 What is your phone number?

Phone number:  
s 9(2)(a)

#### 6 What is your postal address?

Postal address:  
s 9(2)(a)

#### 7 Is your address for service different from your postal address?

No

Organisation:

Contact person:

Phone number:

Email address:

Job title:

Please enter your service address:

### Section 1: Project location

Site address or location

Add the address or describe the location:

The site is located at 9 Harakeke Street, Christchurch. It is within the inner suburb of Fendalton to the northwest of Hagley Park. The site contains a listed heritage building 'Daresbury House' which is included in the Christchurch District Plan as heritage item #185. The heritage 'setting' of Daresbury is identified as Setting #602. These are shown in the attached plans. The site is divided by a tributary of the Avon River. Daresbury Limited has recently subdivided land north of the site to facilitate residential development as the first stage of the proposed project.

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Daresbury Fast track Site location maps.pdf was uploaded

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Do you have a current copy of the relevant Record(s) of Title?

Yes

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Daresbury titles CB29B\_842 and CB29B\_843.pdf was uploaded

Who are the registered legal land owner(s)?

Please write your answer here:

Daresbury Limited

Detail the nature of the applicant's legal interest (if any) in the land on which the project will occur

Please write your answer here:

The applicant is the registered owner of the site.

## Section 2: Project details

What is the project name?

Please write your answer here:

Daresbury residential development

What is the project summary?

Please write your answer here:

To deconstruct Daresbury House and unlock the land's underlying potential to provide residential housing in a strategic inner suburb location within Christchurch City.

What are the project details?

Please write your answer here:

In summary, the project purpose, objectives, and activities are as follows:

- To enable the deconstruction of Daresbury House, a Category 1 Heritage building which requires significant and financially unviable repair (at the cost of approximately \$9.2 million) and which is currently preventing the realisation of the development potential of the site.
- To unlock the underlying potential for the land to provide much-needed residential housing.
- Activities would include deconstruction of Daresbury House, subdivision, land development, and all other associated infrastructure for the same.

Describe the staging of the project, including the nature and timing of the staging

Please write your answer here:

As an experienced home builder, the applicant is ready to proceed immediately. The project involves three stages:

- 1) Careful deconstruction and documentation of Daresbury House in a manner that respects and preserves the heritage values tied to the site;
- 2) Subdivision of the site with new titles issued;
- 3) Development of residential housing on these new titles (with all of the required infrastructure).

What are the details of the regime under which approval is being sought?

Please write your answer here:

Details of the regime under which approval is being sought:

- 1) land use consent under the Christchurch District Plan;
- 2) Subdivision consent under the Christchurch District Plan;
- 3) Suite of water take and water discharge consents from the Canterbury Regional Council for construction phase earthworks and associated stormwater management relating to the subdivision, installation of services, and formation of driveway access for a site adjacent to a waterway.
- 4) Archaeological Authority from Heritage New Zealand Pouhere Taonga.

If you seeking approval under the Resource Management Act, who are the relevant local authorities?

Please write your answer here:

Christchurch District Council and Canterbury Regional Council.

What applications have you already made for approvals on the same or a similar project?

Please write your answer here:

No applications have been made for the project.

Is approval required for the project by someone other than the applicant?

No

Please explain your answer here:

N/A

If the approval(s) are granted, when do you anticipate construction activities will begin, and be completed?

Please write your answer here:

Detailed design, procurement, and funding have already commenced for the project. Site works would commence as soon as reasonably possible after the relevant approvals are obtained, with completion of the project anticipated in March 2025.

### Section 3: Consultation

Who are the persons affected by the project?

Please write your answer here:

- 1) Christchurch City Council and Canterbury Regional Council.
- 2) Heritage New Zealand Pouhere Taonga (given the building is a registered Category 1 heritage building);
- 3) Te Rūnanga o Ngāi Tahu (the relevant iwi authority) and Te Ngāi Tūāhuriri Rūnanga (one of the Papatipu Rūnanga of Ngāi Tahu, in whose takiwā the Site is located). The site does not contain any identified cultural values, however if earthworks are proposed adjacent to the waterway, then mana whenua may be affected in terms of potential impacts on te mana o te wai.
- 4) No other parties are considered to be affected. The proposed subdivision and future buildings are anticipated to be designed to comply with the underlying zoning, boundary setbacks etc and therefore no other parties are considered to be affected.

Detail all consultation undertaken with the persons referred to above. Include a statement explaining how engagement has informed the project.

Please write your answer here:

The applicant has been engaged in ongoing conversations with the Christchurch City Council's heritage team and Heritage New Zealand Pouhere Taonga over a number of years as various retention or deconstruction options have been explored. Both parties were involved in providing feedback on the previous subdivision of the north bank portion of the site. This consultation includes with respect to potential heritage grants to restore, repair and strengthen the building, both organisations have advised a lack of heritage grants being available for what is effectively a private residence.

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Describe any processes already undertaken under the Public Works Act 1981 in relation to the land or any part of the land on which the project will occur:

Please write your answer here:

No works are proposed under the Public Works Act.

### Section 4: Iwi authorities and Treaty settlements

What treaty settlements apply to the geographical location of the project?

Please write your answer here:

There are no specific principles and provisions in the settlement, including statutory acknowledgements, that specifically apply to the geographical location of the project.

The project is located within Te Waipounamu as covered by the Deed of Settlement between the Crown and Te Rūnanga o Ngāi Tahu. The settlement dated 21 November 1997 records the matters required to give effect to the settlement of all of Ngāi Tahu's historical claims. The settlement is implemented in a legislative sense through the Ngāi Tahu Claims Settlement Act 1998.

None of the land on which the project activities will occur is land that has been or is required to be returned under the Ngāi Tahu Claims Settlement Act 1998.

Are there any Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019 principles or provisions that are relevant to the project?

No

If yes, what are they?:

Are there any identified parcels of Māori land within the project area, marae, and identified wāhi tapu?

No

If yes, what are they?:

Is the project proposed on any land returned under a Treaty settlement or any identified Māori land described in the ineligibility criteria?

No

Has the applicant has secured the relevant landowners' consent?

Yes

Is the project proposed in any customary marine title area, protected customary rights area, or aquaculture settlement area declared under s 12 of the Māori Commercial Aquaculture Claims Settlement Act 2004 or identified within an individual iwi settlement?

No

If yes, what are they?:

Has there been an assessment of any effects of the activity on the exercise of a protected customary right?

No

If yes, please explain:

Upload your assessment if necessary:

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## Section 5: Adverse effects

What are the anticipated and known adverse effects of the project on the environment?

Please describe:

The key adverse effect relates to the loss of heritage values. The applicant's heritage assessment has confirmed that even were the building to be repaired, the intrusive nature of these repairs means that the buildings' heritage values must inevitably be degraded as the resultant repaired building would be little more than a replica. Whilst it would still contain heritage values, even in a best-case scenario these heritage values are reduced from those that existed prior to the earthquakes.

The applicant has undertaken extensive work to determine if the building can be repaired in an economically viable way. There is clear evidence that the cost of repairs are double what the repaired building would be worth. The value of the repaired building plus land is likewise 30% more than the most expensive house sale ever made in Christchurch. As such there is an insurmountable gap between the repair cost and what the building will be worth once repaired, even if a buyer could be found, such that the repair of the building is simply not finically feasible. The significant repair costs mean that if demolition consent is not obtained, the building will simply remain in its current vacant state.

The loss of these residual heritage values can be contrasted with the significant benefits that the project will deliver through the provision of much needed housing in a strategic location that is ideally placed to accommodate infill housing development given the site's proximity to the central city and areas of high amenity such as the adjacent river frontage and Hagley Park.

Construction-phase effects relating to stormwater management and earthworks are standard matters that are routinely managed via consent conditions and where there are well-established solutions available to mitigate these temporary effects.

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## Section 6: National policy statements and national environmental standards

What is the general assessment of the project in relation to any relevant national policy statement (including the New Zealand Coastal Policy Statement) and national environmental standard?

Please write your answer here:

National Policy Statement – Urban Development (NPS-UD)

The project is consistent with the objectives and policies of the NPS-UD. The project will contribute to well-functioning urban environments by (among other things):

- Providing a variety of house sizes and lot sizes to provide housing choice in an area where there is a strong need and demand for further residential housing;
- Locating higher density housing options adjacent to high amenity areas;
- Locating higher density housing options in an inner suburb that is readily accessible to the City Centre, with good accessibility to housing, jobs, community services, natural and open spaces;
- Locating higher density housing in a location that is able to be efficiently serviced by existing reticulated infrastructure;
- Prioritising alternative transport modes that include walking, cycling, and public transport given the site's location close to high frequency bus routes, cycleways, and being within easy cycling and walking distance of the city centre, Riccarton Mall, several primary and high schools, and the University of Canterbury. This in turn support reductions in greenhouse gas emissions.

National Policy Statement for Freshwater Management (NPS-FM) and the NES-Freshwater Management (NES-F)

These documents together aim at stopping further degradation of New Zealand's freshwater resources, making immediate improvements and reversing past damage. The Essential Freshwater package also recognises the move towards a holistic, ki uta ki tai approach to management of the natural environment. The NPS-FM recognises that protecting the health of freshwater bodies also protects the health and well-being of the wider environment. On the basis that the proposed activities of earthworks, construction-phase dewatering and discharge might result in potential effects on the adjacent waterway, the NPS-FM is relevant.

- The objective of the NPSFM is to ensure that freshwater is managed to prioritise first the health and well-being of waterbodies and fresh water ecosystems, then the health needs of people, and finally the ability of people and communities to provide for their social, economic, and cultural well-being now and into the future. The NPS-FM contains 15 supporting policies that set out how to implement this objective.
- In regard to this application the relevant waterbodies and freshwater ecosystems is considered to be adjacent tributary to the Avon River. The health and wellbeing of river will not differ from its current form as earthworks will occur outside of the bed and appropriate erosion and sediment control measures will be installed to ensure sediment run off does not enter the bed and will be directed within the site boundaries. The proposed earthworks will not impact on the health needs of people. The project facilitates the ecological restoration of the adjacent riparian margins, in line with the enhancement that has already been undertaken on the north bank of the wider site.

For completeness, the site is not located within the coastal environment and therefore is not subject to the New Zealand Coastal Policy Statement. As an existing residential zone, the site is likewise not subject to the NPS- Highly Productive Land.

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## Section 7: Eligibility

Will access to the fast-track process enable the project to be processed in a more timely and cost-efficient way than under normal processes?

Yes

Please explain your answer here:

Progressing a resource consent through the normal Resource Management Act route would be time consuming (given inevitable public notification and the potential of appeals). Such processes could easily take 1-2 years to complete (potentially longer when accounting for appeals), compared to several months under fast track.

What is the impact referring this project will have on the efficient operation of the fast-track process?

Please write your answer here:

The applicant is confident that referral of the project will not adversely impact the efficient operation of the fast-track process for the following reasons:

- o The applicant is a highly experienced, established, well-funded development company based in Canterbury. The applicant has spent considerable time and money investigating the opportunities for, and constraints on, developing the site for housing in a manner that supports communities and their wellbeing while also looking after the natural environment. As a result, the applicant has a significant body of evidence prepared on its behalf regarding the site. It can therefore be expected that any application for resource consent would be comprehensive, well-considered and supported by robust technical evidence, thereby reducing the likely need for numerous requests for further information which negatively impact the efficient operation of the fast-track process.

- o The applicant has engaged an expert team who have previous experience in utilising and navigating fast-track processes. The expert team were likewise involved in the recent subdivision consent and delivery on the north bank of the wider site and therefore are very familiar with the site and the relevant statutory consenting frameworks.

In short, this project is well-advanced and is supported by a comprehensive understanding of the site and its surrounds. It is being led by an experienced company which is supported by an expert team that has particular experience with fast-track consenting processes. It is therefore considered that referral of the project will contribute to, rather than compromise, the efficient operation of the fast-track process.

Has the project been identified as a priority project in a:

Local government plan or strategy

Please explain your answer here:

The site has an existing residential zone in place. Beyond the immediate riparian edge, the heritage listing is the only matter that would prevent the site from being able to realise medium density residential development. The site is still ideally located for supporting higher density forms of housing anticipated under the NPS-UD.

The Greater Christchurch Councils have recently produced the Greater Christchurch Spatial Plan 2024. This Spatial Plan is a Future Development Strategy prepared under the NPS-UD. It identifies that Greater Christchurch is projected to grow by some 200,000 people over the coming 25 years. This substantial increase in population is to be accommodated primarily through the intensification of existing urban areas (the Spatial Plan does not provide for any additional greenfield housing beyond that identified in the first Greater Christchurch spatial plan prepared back in 2007). The Spatial Plan shows the city centre and adjacent inner suburbs as being the key focal points for where this intensification should occur. The proposal therefore directly aligns and supports the delivery of the Spatial Plan for Greater Christchurch.

Will the project deliver regionally or nationally significant infrastructure?

Not Answered

Please explain your answer here:

N/A

Will the project:

increase the supply of housing, address housing needs, contribute to a well-functioning urban environment

Please explain your answer here:

Yes. As set out in sections 5 and 6 above, the project will deliver much needed housing in a location that is strategically located for delivering such housing whilst contributing towards a well-functioning urban environment.

The site is also half a hectare which is a significant size in the context of a sought-after inner-city suburb in Christchurch. There will be few other sites in the city which could provide this same level of development capacity in already established urban areas.

Will the project deliver significant economic benefits?

Yes

Please explain your answer here:

The project will deliver significant economic benefits to the district. The project will enable the redevelopment of a large strategic site for the delivery of housing worth over \$50 million. The project will also deliver significant economic benefits with respect to employment/job creation, stimulating the construction sector.

Will the project support primary industries, including aquaculture?

No

Please explain your answer here:

Will the project support development of natural resources, including minerals and petroleum?

No

Please explain your answer here:

Will the project support climate change mitigation, including the reduction or removal of greenhouse gas emissions?

Yes

Please explain your answer here:

As set out above, the site is strategically located to enable additional housing in close proximity to significant employment and service areas, thereby minimising carbon emissions associated with vehicle travel. The site is likewise located adjacent to a major cycle way and high frequency bus routes, supporting alternative modal choice.

Will the project support adaptation, resilience, and recovery from natural hazards?

Yes

Please explain your answer here:

The site is not exposed to any natural hazards. Whilst located adjacent to a waterway the site is set at a higher level/ terrace and all building platforms will be clear of any flood hazards identified in the District Plan. The Christchurch City Council has undertaken detailed modelling of flood risk as part of the preparation of the District Plan. This modelling takes into account the potential for flood risk to be exacerbated over time through climate-change induced rainfall events and sea level rise.

Will the project address significant environmental issues?

Yes

Please explain your answer here:

Yes – as set out above the project will deliver much needed housing in a strategic location that is able to be readily serviced by existing network infrastructure. This in turn will assist in supporting the competitive operation of land and development markets, which ultimately would reduce house prices and increase housing options for all across New Zealand.

Is the project consistent with local or regional planning documents, including spatial strategies?

Yes

Please explain your answer here:

As set out in Section 7, the project is consistent with the intensification outcomes sought in the Greater Christchurch Spatial Plan 2024.

The Christchurch District Plan includes policies and rules relating to the management of historic heritage. The policy outcomes were a bespoke response to Christchurch's unique context following the Canterbury Earthquake sequence. They were drafted to recognise that a number of heritage items had sustained high levels of damage and that retention and repair may not be possible in all situations. The criteria for heritage listing in the Christchurch District Plan provides, in summary, that identification of a building having heritage values is not the end of the matter when it comes to listing. The District Plan also requires that an assessment be undertaken of the physical condition of the building, whether the effects of any repairs would be such that the building post-repair no longer contained sufficient remaining value to be listed i.e. it was functionally a replica; and/or whether "there are engineering and financial factors related to the physical condition of the heritage item that would make it unreasonable or inappropriate to schedule the heritage item" .

The District Plan also provides a framework for when it is appropriate to authorise the demolition of heritage building, this requires consideration of "whether the costs to retain the heritage item (particularly as a result of damage) would be unreasonable" .

The proposal is considered to be consistent with the policy framework for heritage management in Christchurch, as the applicant has obtained detailed reports that clearly establish that the costs associated with the ongoing repair and retention of Daresbury House are unreasonable.

Anything else?

Please write your answer here:

The applicant is happy to provide any further information on request.

Does the project includes an activity which would make it ineligible?

No

If yes, please explain:

## Section 8: Climate change and natural hazards

Will the project be affected by climate change and natural hazards?

No

If yes, please explain:

The site is not exposed to any natural hazards. Whilst located adjacent to a waterway the site is set at a higher level/ terrace and all building platforms will be clear of any flood hazards identified in the District Plan. The Christchurch City Council has undertaken detailed modelling of flood risk as part of the preparation of the District Plan. This modelling takes into account the potential for flood risk to be exacerbated over time through climate-change induced rainfall events and sea level rise.

## Section 9: Track record

Please add a summary of all compliance and/or enforcement actions taken against the applicant by any entity with enforcement powers under the Acts referred to in the Bill, and the outcome of those actions.

Please write your answer here:

There have been no compliance and/or enforcement actions taken against the applicant by any entity with enforcement powers under the Acts referred to in the Bill.

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## Declaration

Do you acknowledge your submission will be published on environment.govt.nz if required

Yes

By typing your name in the field below you are electronically signing this application form and certifying the information given in this application is true and correct.

Please write your name here:

James Milne

Important notes