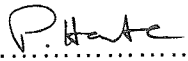


Draft 2007 Amendment to Long Term Council Community Plan Christchurch City Council

We wish to talk to our written submission at the hearings on Monday 28 May and Tuesday 5 June 2007.

Our submission refers to the draft 2007 Development Contributions Policy

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on behalf of submitter

1 - Small Residential Unit Adjustment to HUE Calculation

We consider that the Small Residential Unit needs to include Elderly Person Housing Units and other forms of Retirement Housing.

The draft DCP provides for an adjustment to be made to the HUE calculation for a development that involves two or more residential units less than 100m² (inclusive of 13m² parking allowance per unit). It is understood that this adjustment has been introduced to take into account the lower demand generated for network and community infrastructure and reserves by smaller residential units, due to their lower occupancy levels.

It understood this adjustment would apply primarily to apartment buildings. However, as it is currently worded the adjustment is also applicable to Elderly Person Housing (EPH) Units, which are required to be no larger than 80m² including a garage. This is considered entirely appropriate, as the occupancy of EPH units is less than 2.6 persons per household and as such the demand for services is lower than for a standard household. We also consider that all residential units that are part of a retirement village, as defined in the Retirement Villages Act 2003, should be entitled to a small residential unit adjustment as the average occupancies of these is 1.6 to 1.7 persons.

The City Plan Team are in the process of preparing a plan change to alter the rules relating to the sizes of EPH units. It is proposed that those EPH that are part of a complex including a care facility will not have maximum floor size or site density, whilst those that are standalone units will be limited to a minimum site size of 300m² with a maximum coverage of

40%, and height of 5.5m. These changes are based on residential amenity concerns. Whilst some units within a complex may meet the size limitations, some may be larger as a result of the new approach proposed by the draft Plan Change. This will also apply to those EPH that are not part of complex with a care facility. Whilst these units may be able to be built to a smaller size, it is likely that they will be established to their permitted maximum (approximately 120m² including a garage of 18m²) on a minimum site of 300m². If the draft plan change proceeds in its currently form, some new EPH may not be able to use this small residential unit adjustment, and this is not consistent with the intent of the adjustment. There is also a possibility that the plan change will be altered to simply allow larger EPH. This possibility needs to be recognised by the DCP at this stage otherwise it will be out of step with the district plan until its next review in 3 years time.

We consider that both EPH and retirement village units should be specifically mentioned as being entitled to an adjustment for small residential units because a retirement village development may not ultimately be classified as an EPH complex under the City Plan, but the demand for services is the same. We consider that regardless of the particular floor area associated with an EPH or retirement village unit, that the demand for services will be similar. Because of the potential variation in size of units, which does not necessarily reflect occupancy, we consider a flat adjustment (rather than a sliding scale) should apply. As the average occupancy of these units is 1.6-1.7 people, which is 65% of the overall average household occupancy of 2.6, we consider an adjustment of 75% is appropriate which recognises that not all of the cost associated with servicing is density related.

The area of a small residential unit as currently stated within the draft DP is inclusive of 13m² for 1 parking space allocation. This size is smaller than a 'garagable space', which is the requirement in the City Plan for a residential unit. However it is of a size of a parking space located within a multibay garage or parking building. There is no explanation given as why an area for parking is taken into account, and it does not seem necessary. We consider that the parking allowance should be excluded from the unit size.

Requested Amendments

1. Include an adjustment to the HUE assessment for Elderly Persons Housing units (as defined by the City Plan) and Retirement Villages at 3.2.1 Pg 36. Suggested wording:

Where the development involves Elderly Person Housing Units or a Retirement Village, then an adjustment will apply that reduces the HUE assessment to 0.8HUE per unit.

2. Include the following in the glossary if considered necessary:

Elderly Person Housing Unit – see definition within the Christchurch City Plan

Retirement Village – See meaning contained within the Retirement Villages Act 2003.

3. That the parking space allocation is excluded from the area of the small residential unit adjustment.- 3.2.1. Pg36