My name is Peter Dyhrberg. I have been a resident within the Four Avenues of Christchurch from 1976 to the present.

Following a time working alongside Rod Donald – who was instrumental in setting up a Peterborough Street Housing Cooperative (currently being rebuilt following the Christchurch earthquakes) – I was an early co-ordinator of the North East Inner City Neighbourhood Group.

Latterly I have been pro-active within one of those smaller groups, namely the Chester Street Residents Association group.

Throughout the whole of the period described – including the period from 2001 – 2006 when I was Chair of the Christchurch Civic Trust Inc. – I have participated extensively in local initiatives and consultations with the Christchurch City Council over many (Resource Management) planning issues.

**Initial Responses**

1. *The desire to promote; well functioning cities, with effective design and, a strong sense of place, which should improve physical and mental health, wellbeing and social functioning* is laudable.

   Further, however, it is submitted such cities would not only recognise but protect and provide for historical and cultural heritage.

   The work of NZ Treasury – referred to in Historic Places, Wellington, Submission – which notes the importance of historic protection and cultural connectedness for the healthy wellbeing of the nation and its population, makes an important contribution in this context.
2. A first point to be made, from a specifically Christchurch perspective is that any directives resulting from an NPS should be couched so as to ensure that people still working through repairs or reinstatements of their homes, following earthquake damage, should be exempted from any rules requiring new levels of residential density within the zones where such repairs or reinstatements are being undertaken. (Currently in the District Plan “development or redevelopment” is defined so as not to affect such post quake repairs / reinstatements, as would otherwise be stymied by new density requirements.

3. In terms of a N.Z. cultural inheritance it is considered important to recognise that many of current New Zealanders forbears came here – inter alia – to get away from grossly overcrowded housing and living conditions. That no doubt underpinned the “quarter acre pavlova paradise” mindset which has seen a proliferation of one eighth to one quarter acre residential building patterns for so much of our recent history.

In that context New Zealanders are – not surprisingly – showing a reluctance to make the shift towards more apartment style living.

It is submitted, therefore, that changes toward higher density of residential areas, in already built up areas of our main cities, will best be managed in a way that provides for a considerate transition as between current and unfolding new degrees of density which frequently occur cheek by jowl, one beside the other.

That highlights why there is a significant emphasis on the sort of regulatory mechanisms which are the subject of criticism in the proposed NPS (pages 42 and 43).

However, on a broader note, those same mechanisms represent to many a minimal form of assurance of a reasonable standard of residential amenity. Accordingly, it is submitted they will be equally important in even greenfields residential developments, particularly where such developments contain mixed degrees of density as would be appropriate.

It is submitted that the potential impact on cost and availability of housing from the sorts of rules considered to impose unnecessary constraints on development are overstated. Other factors no doubt have significant impact.

Attached marked A. is an article noting the cost of delays getting Building consents.
There are greater costs when building residential units above three stories.

Many independent builders are ill-equipped and generally lack resources to aggregate existing land titles to facilitate larger or higher rise developments.

There are many such factors – including the way financing of new home purchases is – or is not – able to be arranged by first home buyers.

Suffice it to say that it is seen as trite to be setting out aspirations for quality urban development – on the one hand – and looking to abrogate application of the very planning mechanisms which most see as the bare minimum called for to provide security of expectation of a reasonable standard of residential amenity.

4. A descriptive approach which gives adequate scope for local authorities to decide on location is clearly preferable to the prescriptive option. The latter would almost inevitably be very damaging to the early fabric and social cohesion of the cities concerned.

It is submitted that in the Christchurch context an interconnection with planning for potential increases in residential capacity in outlying centres such as Rangiora and Kaiapoi (Waimakariri and Selwyn District Councils) and Rolleston, for example, be considered.

It is submitted that greenfields development should be a starting point for increased densities where linked by appropriate transport. In these contexts a full mix of housing types could be established within good framework environments. (An example of that approach can be seen in the Ngai Tahu development on the site of the former Sunnyside Hospital), in Christchurch.

5. Where not inconsistent with the terms of this submission, I respectfully endorse the Submission of the Christchurch City Council – especially in relation to the opints made about greenfields capacity and potential out of sequence application of same.

6. As well as allowance in any NPS for protection of especially valuable soils, it is submitted that Historic heritage likewise be protected. But in addition protective allowance should also be made for areas of special amenity value where Historic heritage values make a significant contribution to such special amenity value.
Attached marked B. to E. inclusive are the considered views of noted architect, Jeremy Salmond which indicate the thrust of the rationale underpinning this submission.

7. Submit investigation of “co-housing” schemes and other options run in Scandinavia and relationships between greenfields developments and pastoral / open spaces be pursued.
Builders query lengthy time for council consents

It's easier and quicker to build a house than it is to get building consent, some builders say. And since the leaky homes scandal and the Christchurch earthquake, building consents have become onerous to the point of being "encyclopedic" in the amount of information and level of detail required.

Latitude Homes managing director Marc Hunter said while the statutory time frame for consents to be completed was 20 days, his company waited on average eight-to-12 weeks for approval because councils frequently asked for more information at the last minute, known as a Request for Information (RFIs).

"The issue is that on the 19th day, 98 per cent of the time we will receive an RFI letter from the council," Hunter said.

RFIs stop the clock on the 20-day consent process and resume once the information is received.

Councils were sitting on consents over "silly stuff" that should be sorted out when lodged, while many RFI queries were insignificant or already contained in the documentation provided, he said.

A director for the Lower North Island, Bruce Martin said when he first started out a consent application contained about eight pages with maybe 50 pages of documentation. Now, he said, it was thousands of pieces of paper.

"Fifteen years ago it was a piece of cake but now it's easier to build a house than it is to get building consent," he said.

Auckland Council manager project assessment south, Peter Laurenson said it took an average of 15 working days to process building consents, but when the clock stopped for an RFI, on average it took the customer 19 days to respond, taking the average number of days for consent to 34.

Laurenson said 77 per cent of all applications required the council to request further information.

Christchurch City Council said the average time for residential building consents to be approved was 10 working days, and 13.5 for commercial, while 72 per cent of building consents issued required further information.

Institute of Architects Auckland branch chairman Ken Crosson said that councils had become the "last man standing" after the leaky house crisis.

"What we've got now are very gun-shy councils and a building sector beset with problems largely because of poor legislation," he said.
Jeremy Salmond
New Zealand Institute of Architects
Gold Medal 2018
What's the lesson of Aniwaniwa?
The lesson, I suppose, is: what will happen, will happen. There are things you cannot control. The lesson is that the Government's guidelines for the management of historic buildings are of little value if even statutory obligation can be set aside so readily.

What is the point of heritage classification, and all the work that goes into it, if it can be ignored?
There are a few points to make. One is that when the Historic Places Trust became Heritage New Zealand it was absorbed into the Ministry of Culture and Heritage and is now under direct government control. As the Historic Places Trust, advocacy was one of its primary functions. That's been taken away.

Secondly, why have a national listing process if this has no statutory outcome? Heritage New Zealand can't prevent any action on a listed building. You have to go through an Resource Management Act (RMA) process for that, so it goes to the local authority. In the Aniwaniwa case, it seems to me that the local authority was managed very carefully to avoid fulfilling its statutory obligation. It apparently had sought advice about this, that and the other thing, when that advice was wrong. What you see is institutions selectively taking the advice that suits them.

It seems that this country has to decide whether there are certain buildings that are worth saving, and then find a way to save them. Perhaps there should be a reason for a restricted number of such buildings.

There's no reason for a restricted number. They're either important or they're not. If I go back to my book, part of my interest was writing about ordinary things – ordinary houses that ordinary folk lived in. These buildings might never be considered important of themselves, but in the collective they are hugely important because they're the authentic texture of our towns.

My view is that if there's a clear local character in an area of the city, if you have enough houses of a certain character, then you can justify protections of that character. You can allow new things to happen, but you have to identify where there are things worth preserving and look after the urban character that they create.

In Auckland I got the job of assessing a whole lot of areas that had a preliminary categorisation put over them. I looked at about two and a half thousand houses and assessed them against the agreed criteria. Generally speaking, it was fine, but in Auckland's eastern suburbs particularly, out came the lawyers and the planners and it all went to the Environment Court. I had to substantiate something like 250 buildings that I thought should be preserved. I had two days in the court with every lawyer in town having a crack at me, questioning my judgement.

The system needs to be simpler than that. You can't deal with heritage or character en masse on the basis of individual buildings, because this allows them to be treated as if, individually, they are 'historic' – that is, scheduled – when in fact the value lies in their aggregate value and townscape qualities. It also allows individual buildings to be picked off because individual significance can't be demonstrated, and this leads to death by a thousand cuts in those character areas.

And then there's the issue of listing. In New Zealand we have two lists – one national, one local. Do we need two lists? Why are the two lists different? The Heritage New Zealand list is about buildings and places that are significant in their own right and could be seen to be so on a national level, whereas district plan lists should include those buildings but equally include a lot of other places or buildings that might have local significance. This doesn't mean they're not important. The trouble is that the national list does not have statutory protection while the local list does, through the RMA – at least to the extent that it gets some chance of protection. There's moral force in the national list, but it doesn't necessarily cut the mustard when other non-heritage factors are brought to bear.
The other side of this is that local authorities are invariably not well equipped to deal with these things; they often don't have expertise. They don't apply the rigour that, say, Auckland, Wellington or Christchurch councils do when they establish their schedules. There's great inconsistency in the process.

My view is that Heritage New Zealand could have a consulting role for local authorities. It could help them establish lists and blend the two systems together, so that the Heritage New Zealand list does enjoy some statutory protection - because all their buildings should be on district plans.

Another lesson of Aniwaniwa is that even though a building might be on a heritage list, you can't make its owner look after it. There's the issue of demolition by neglect. Absolutely, and the state is an expert at that. Look at the Magistrates' Court in Auckland before it became Metropolis. That was demolition by neglect. The other thing about Aniwaniwa is that because it didn't get on the local authority list, there was no mechanism for appealing its demolition. You couldn't take the government to court over the issue or go to the Environment Court about it. The Court, I suspect, with the weight of professional evidence, would've found in favour of preservation if it had been a scheduled building.

To return to your own office - what is the working environment you've sought to cultivate?
I've always tried to run a very open practice. Of course, there are things you can't talk to employees about, especially as the office gets larger, but we've always been pretty open about what goes on. There is a slightly alarming levity in the office.

Really? You're pretty serious.
Me? Hell, no. I am serious about what I do but I've always wanted the work to be enjoyable and interesting. We try really hard to look after