

Friday 6 October 2023 Draft Naming Policy/Outdoor Dining Policy Timetable		
Time	Name	Submitter Number
9.00am	Apologies and Election of Chair	
9.05am	Staff presentation on Draft Naming Policy	
9.15am	Marie Pollisco, Deputy Chairperson Waipuna Halswell-Hornby-Riccarton Community Board (also presenting submission on the Outdoor Dining Policy)	7067 (7178)
9.30am	Emma Norrish, Chairperson Waipapa Papanui-Innes-Central Community Board	7039
9.40am	Callum Ward, Chairperson and Keir Leslie, Deputy Chairperson Waihoru Spreydon-Cashmere-Heathcote Community Board (also presenting submission on the Outdoor Dining Policy)	7082 (7080)
9.50am	Paul McMahon, Chairperson Waitai-Coastal-Burwood-Linwood Community Board Submissions Committee	7056
10.00am	David Hawke, Secretary, and John Bennett, Chairperson Halswell Residents' Association	6389
10.10am	Chris Ford, Regional Policy Advisor (Local Government) Disabled Persons Assembly	250823
10.20am	Jenny Healey, Chairperson Cass Bay Residents' Association	7036
10.30am	BREAK	
10.40am	Staff presentation on Outdoor Dining Policy	
10.55am	Amanda Dodd Cancer Society New Zealand	7180

11.05am	Carina Duke Living Streets Aotearoa	7183
11.15am	Kirsty Jacomb On behalf of VHL Hospitality Limited and the Terrace Hospitality Group	7170
11.35am	BREAK	
11.40am	Marjorie Manthei Victoria Neighbourhood Association	6875
11.50am	Amanda Storey Chiwahwah/Zodiac	7052
12.00pm	LUNCH BREAK	
12.45pm	Panel questions for staff and deliberations on Draft Naming Policy and Outdoor Dining Policy	

Submissions received on the Draft Naming Policy, August 2023

.Would like to be heard by the hearings panel

Waipuna Halswell-Hornby-Riccarton Community Board - Submission on Draft Naming Policy		
ID	Name - Organisation	Submitter feedback
7067	Marie Pollisco, Deputy Chairperson Waipuna Halswell-Hornby-Riccarton Community Board	<p><i>Do you think updating the Naming Policy is necessary? Yes</i></p> <p>2.1 The Board supports in general updating the Naming Policy as it is aware that a number of residents have expressed frustration regarding road naming. Halswell in particular, has a large number of new developments with requirements for new names for r</p> <p>2.2 The Board notes Part 1 of the policy at 1.1.b indicates that generally, a name should be: Unique and does not have a similar sound or spelling to an existing name in the area, and 6.1 that lists the types of names not suitable for approval and includes eg. Names for roads which may cause confusion because they are associated with another geographical location or feature eg. Parklands Drive which is not located in the Parklands suburb. "The Board submits that there needs to be clarity on what is "the area" to be considered i.e. is this within the same suburb/city/region? The Board comments also that the naming of subdivisions/suburbs can create confusion, for example, there is a new subdivision in Belfast called Oaklands, when there is also a suburb in Halswell called Oaklands.</p> <p>2.3 The Board supports Part 1, Section 7 providing for changes and alterations to names noting, in particular 7.1.a that provides for alteration of the names to correct spelling. There is an example of a need for this in Halswell where Hurutini Way is an existing road, but the correct spelling is Huritini.</p> <p>2.4 With reference to Part 3: Policies on naming and sponsorship of facilities Section 5.1 regarding use of dual names (Māori and English) for parks and facilities in some cases the Board considers that dual names should as a rule be used for facilities or an English descriptor added following a Maori name to identify the type/purpose of the facility e.g. Matatiki Hornby Centre.</p> <p>*See attachment</p>

SUBMISSION TO: Christchurch City Council
ON: Draft Naming Policy
BY: Waipuna Halswell-Hornby-Riccarton Community Board
CONTACT: Faye Collins
Community Board Adviser
[REDACTED]

1 . INTRODUCTION

- 1.1. The Waipuna Halswell-Hornby-Riccarton Community Board (“the Board”) appreciates the opportunity to make a submission on the Council’s Draft Naming Policy.
- 1.2. The Board wishes to be heard in support of its submission.

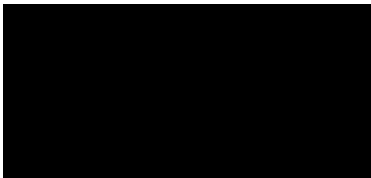
2. SUBMISSION

- 2.1. The Board supports in general updating the Naming Policy as it is aware that a number of residents have expressed frustration regarding road naming. Halswell, in particular, has a large number of new developments with requirements for new names for roads and parks. The Naming Policy is an opportunity to provide guidance consistency.
- 2.2. The Board has an interest in the naming of Roads, Parks and Facilities within its Board area.
- 2.3. The Board considers that it is important when naming an entity to consider whether a name will:
 - acknowledgemanana whenua
 - acknowledgeCultural heritage
 - acknowledge Local identity and be reflective of the history, culture, environment and/or current identity of the location
 - Have a meaningful connection to the locality.
- 2.4. The Board notes Part 1 of the policy at 1.1.b indicates that generally, a name should be: Unique and not have a similar sound or spelling to an existing name in the area, and 6.1 that lists the types of names not suitable for approval and includes - g. - "Names for roads which may cause confusion because they are associated with another geographical location or feature, e.g., Parklands Drive which is not located in the Parklands suburb." The Board submits that there needs to be clarity on what is “*the area* “ to be considered i.e. is this within the same suburb/city/region? The Board comments also that the naming of subdivisions/suburbs can create confusion for example there is a new subdivision in Belfast called Oaklands when there is also a suburb in Halswell called Oaklands.

- 2.5. The Board supports Part 1, Section 7 providing for Changes and alterations to names noting, in particular 7.1.a that provides for alteration of the names to correct spelling. There is an example of a need for this in Halswell where *Hurutini Way* is an existing road but the correct spelling is *Huritini*.
- 2.6. With reference to Part 3: Policies on naming and sponsorship of facilities section 5.1. regarding use of dual names (Māori and English) for parks and facilities in some cases the Board considers that dual names should as a rule be used for facilities or an English descriptor added following a Maori name to identify the type/purpose of the facility e.g. Matatiki Hornby Centre.

3. CONCLUSION

- 3.1. The Board requests that the Council takes into consideration the above submission on the Draft Naming Policy.



Helen Broughton
Chairperson Waipuna Halswell-Hornby-Riccarton Community Board

Dated 25 August 2023

Submissions received on the Draft Naming Policy, August 2023

Waipuna Halswell-Hornby-Riccarton Community Board - Submission on Outdoor Dining Policy							
ID	Do you support the draft policy?	Parts of the policy you support	Parts of the policy you oppose	Feedback on the draft Outdoor Dining Guidelines and Standard Conditions	Should the policy do more to accommodate small businesses?	Provide your feedback here	
7178	Yes. See attachment.	<p>3.1 The Board supports the draft single policy as it is more user-friendly to better meet the needs of the hospitality industry and the wider community.</p> <p>3.2 The Board wishes to support the draft policy, in particular:</p> <p>3.3 That outdoor dining areas are accessible for all pedestrians including users of wheelchairs and mobility devices and for the visually impaired.</p> <p>3.4 As a place-making strategy ie. turn little centres into villages, enhancing local social connection and cohesion.</p>					

SUBMISSION TO: Christchurch City Council
ON: Outdoor Dining Policy review
BY: Waipuna Halswell-Hornby-Riccarton Community Board
CONTACT: Faye Collins
Community Board Adviser
[REDACTED]

1 . INTRODUCTION

- 1.1. The Waipuna Halswell-Hornby-Riccarton Community Board (“the Board”) appreciates the opportunity to make a submission on the Council’s Draft Outdoor Dining Policy review.
- 1.2. The Board wishes to be heard in support of its submission.

2. SUBMISSION

- 2.1. The Board supports the draft policy in general.

Draft Outdoor Dining Guidelines and Standard Conditions

- 2.2. The Board fully supports that pedestrians will be given priority by ensuring safety, particularly for those with disabilities.
- 2.3. The Board notes that the “draft Outdoor Dining Guidelines and Standard Conditions” referred to in consultation document is “headed Outdoor Dining Guidance” and submits that there needs to be consistency in terminology.
- 2.4. The Board notes that Outdoor Dining Guidance standard condition 25 – refers to “[within 5 metres of the boundary of the area/as shown on the attached plan]”. As there is no plan attached to the Guidance the Board considers that the meaning of this is unclear.
- 2.5. The Board refers to the second point under Dining Area Layout in the Outdoor Dining Guidance (also mentioned in the Outdoor Dining policy Section 6.3.1 third point] *“the design of dining areas requires careful consideration. It will change the nature and of the public space and how the public use it, visibility of the business and facades, and the experience of customers.”* and suggests that the Council has the design and appearance proposed in applications assessed by a qualified urban design planner.

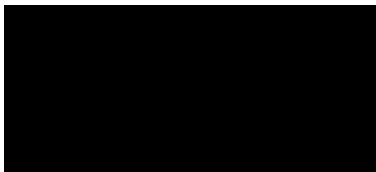
Draft Outdoor Dining Policy

- 2.6. The Board suggests that the heading of Section 6 *“Applications for outdoor dining”* be amended to add “licence” at the end as an application is for a licence not for outdoor dining per se.

- 2.7. The Board considers that Section 7 Explanatory note - "The fee is set at a level that reflects the value of the location." does not make it clear how this value is assessed. Is it based on the value of the property or does it relate to location so that the fee may be different if the location is in Riccarton, as compared to Halswell?
- 2.8. The Board refers to Section 6.4 – "The Council will notify the applicant in writing of its decision on the application. Should the Council decline an application, the reasons for refusal will be provided in writing." and suggests that if an application is declined an opportunity should be provided for the applicant to amend the application and re-apply.

3. CONCLUSION

- 3.1. The Board requests that the Council takes the above submission into consideration.



Helen Broughton
Chairperson Waipuna Halswell-Hornby-Riccarton Community Board

Dated 28 August 2023

Submissions received on the Draft Naming Policy, August 2023

Waipapa Papanui-Innes-Central Community Board - Submission on Draft Naming Policy		
ID	Name - Organisation	Submitter feedback
7039	Emma Norrish, Chairperson Waipapa Papanui-Innes-Central Community Board	<p><i>Do you think updating the Naming Policy is necessary? Yes</i></p> <p>The Board supports the reasoning for updating the policies; the policies it proposes to replace are now 30 years old and are being appropriately reviewed for update with the significant changes that have taken place over this time, and to provide better guidance on naming and thoughtfully facilitating the greater diversity in names presented to the Board for consideration. It is also important to have this opportunity to give effect to recent Council strategies, including “Christchurch Multicultural Strategy, Te Rautaki Matawaka Rau” and “Our Heritage, Our Taonga”, and receive appropriate guidance on the use of Māori names consistent with our responsibilities to Mana Whenua. The Board supports the purposes of the Draft Naming Policy, recognising the importance of practical considerations, such as provide names that are not easily confused with other similar names and assist with wayfinding, and equally that names recognise our local identity, unique environment, and social and cultural heritage, as well as contributing to cultural vibrancy, promote a sense of connection with our diverse communities.</p> <p>The Board is supportive of the criteria for assessing names, and the list of types of names not suitable for approval. The purpose of the Draft Naming Policy in ensuring names are enduring and have a meaningful connection to the locality is of real importance for a sense of place and identity; the Board also appreciates the adverse practical impacts and confusion arising where names need to change, reinforcing that they need to be appropriate and fit for purpose from the start.</p> <p>The Board appreciates that the list of types of names that are unsuitable and supports the principal of ensuring that names are enduring. These anticipate without undue complication what type of names could become inappropriate.</p> <p>More generally it is encouraging that the Draft Naming Policy reflects that community and place are front and centre, ahead of self-promotion and temporary interests, particularly those with commercial ties. The Board recognises there may at times be justification for the exception around sponsorship names for facilities and leased parks. We refrain from objecting to that, though we note that those arrangements may at times compromise the purposes of the Draft Naming Policy, and so should be required to demonstrate real value to the community that outweighs the compromise. The Board is particularly conscious that facilities used for Civil Defence Centres or attracting visitors to the city should be easy to locate.</p> <p>The Board supports the reference under ‘Part 2: Policies Specific to the Naming of Roads’ that emphasises the importance of clear identification of properties for emergency purposes. It is of fundamental importance that we look after our people. Not only is this relevant for day-to-day emergency services, but also Civil Defence responses which may be national or international. There should not be a sole reliance on any systems local emergency services have in place, given the possibility that Search and Rescue Teams may not have access to those systems and may need to navigate our area.</p> <p>The development of Google Maps and other such technologies make many addresses easier to find, which supports the situation where laneways are not named. However, the Board suggests that new developments with laneway access, such as a business park, are considered on a case-by-case basis as per Board delegation to decide whether they are appropriate to name or not.</p> <p>The Board appreciates the Draft Naming Policy covering issues that the Board has raised over recent years. *See attachment</p>

24 August 2023

Papanui Service Centre
5 Restell Street
Christchurch 8013

Christchurch City Council

PO Box 73024
Christchurch 8154

By Online Submission
(consultation questions copied in bold below)

ccc.govt.nz

Tēnā koe,

Waipapa Papanui-Innes-Central Community Board Submission on the Draft Naming Policy

Do you think updating the Naming Policy is necessary?

Yes

Why did you say that?

The Board supports the reasoning for updating the policies; the policies it proposes to replace are now 30 years old and are being appropriately reviewed for update with the significant changes that have taken place over this time, and to provide better guidance on naming and thoughtfully facilitating the greater diversity in names presented to the Board for consideration.

It is also important to have this opportunity to give effect to recent Council strategies, including "Christchurch Multicultural Strategy, Te Rautaki Matawaka Rau" and "Our Heritage, Our Taonga", and receive appropriate guidance on the use of Māori names consistent with our responsibilities to Mana Whenua.

The Board supports the purposes of the Draft Naming Policy, recognising the importance of practical considerations, such as provide names that are not easily confused with other similar names and assist with wayfinding, and equally that names recognise our local identity, unique environment, and social and cultural heritage, as well as contributing to cultural vibrancy, promote a sense of connection with our diverse communities.

What is your area of interest?

Roads - Yes

Parks - Yes

Facilities - Yes

What part of the Draft Naming Policy would you like to comment on?

Part 1: General - Yes

Part 2: Policies specific to the naming of roads - Yes

Part 3: Policies on naming and sponsorship of facilities - Yes

Other (please specify) - No

Please comment here

The Board is supportive of the criteria for assessing names, and the list of types of names not suitable for approval. The purpose of the Draft Naming Policy in ensuring

names are enduring and have a meaningful connection to the locality is of real importance for a sense of place and identity; the Board also appreciate the adverse practical impacts and confusion arising where names need to change, reinforcing that they need to be appropriate and fit for purpose from the start.

The Board appreciates that the list of types of names that are unsuitable supports the principal of ensuring that names are enduring. These anticipate without undue complication what type of names could become inappropriate.

More generally it is encouraging that the Draft Naming Policy reflects that community and place are front and centre, ahead of self-promotion and temporary interests, particularly those with commercial ties. The Board recognises there may at times be justification for the exception around sponsorship names for facilities and leased parks. We refrain from objecting to that, though we note that those arrangements may at times compromise the purposes of the Draft Naming Policy, and so should be required to demonstrate real value to the community that outweighs the compromise. The Board is particularly conscious that facilities used for Civil Defence Centres or attracting visitors to the city should be easy to locate.

The Board supports the reference under 'Part 2: Policies Specific to the Naming of Roads' that emphasises the importance of clear identification of properties for emergency purposes. It is of fundamental importance that we look after our people. Not only is this relevant for day-to-day emergency services, but also civil defence responses which may be national or international. There should not be a sole reliance on any systems local emergency services have in place, given the possibility that search and rescue teams may not have access to those systems and may need to navigate our area.

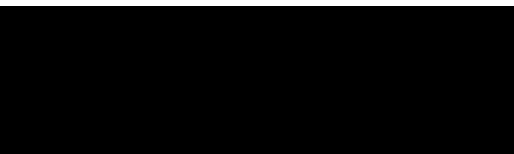
The development of Google Maps and other such technologies make many addresses easier to find, which supports the situation where laneways are not named. However, the Board suggests that new developments with laneway access, such as a business park, are considered on a case-by-case basis as per Board delegation to decide whether they are appropriate to name or not.

The Board appreciates the Draft Naming Policy covering issues that the Board has raised over recent years.

Would you like to speak to decision makers about your submission?

Yes

Nāku noa, nā



Emma Norrish
Chairperson
Waipapa Papanui-Innes-Central Community Board

Submissions received on the Draft Naming Policy, August 2023

Waihoru Spreydon-Cashmere-Heathcote Community Board - Submission on Draft Naming Policy		
ID	Name - Organisation	Submitter feedback
7082	Callum Ward, Chairperson and Keir Leslie, Deputy Chairperson Waihoru Spreydon-Cashmere-Heathcote Community Board	<p><i>Do you think updating the Naming Policy is necessary? Yes</i></p> <p>The Community Board believes that feeling connected is facilitated by seeing yourself reflected in your local environment, which includes street names that reflect the diversity of the population, including gender and minority ethnic groups.</p> <p>The Waihoru Spreydon-Cashmere-Heathcote Community Board appreciates the opportunity to provide a submission to the Christchurch City Council on the Draft Naming Policy and thanks staff for the work done on this matter.</p> <p>The Board's statutory role is "to represent, and act as an advocate for, the interests of its community" (Local Government Act 2002, section 52). The Board provides this submission in its capacity as a representative of the communities in the Spreydon-Cashmere-Heathcote area.</p> <p>Our Community Board Plan's vision is that "Spreydon-Cashmere-Heathcote is a place where people are actively engaged and contribute to thriving communities and environments, where they feel they belong and are safe and connected with each other". The Community Board believes that feeling connected is facilitated by seeing yourself reflected in your local environment, which includes street names that reflect the diversity of the population, including gender and minority ethnic groups.</p> <p>The Board wishes to support the purpose of the draft policy, and would like to add:</p> <ul style="list-style-type: none"> • When the name is gifted from Mana Whenua, that Council accepts the gifted name • The Board is in support of the principle that mana whenua is only asked to gift names for significant places. This is appropriate and respectful of the mana of names and of the demands on mana whenua in this process <p>We are concerned there is a risk that this may have an unintended consequence that less kupu Māori are used in naming.</p> <p>Mana whenua may have the view that te reo should only be used for significant places. We would understand and accept that perspective.</p> <p>In general terms, the Board's view is that the use of te reo Māori in everyday settings is an important part of revitalising the language and making it accessible to all New Zealanders.</p> <p>The Board recognises that developers often wish to use te reo Māori, but have concerns around cultural appropriateness in the use of te reo, and wish to consult with mana whenua. Developers often lack expertise in this area. However, this imposes a demand on mana whenua to respond. The Board's view is that Council needs to provide support to developers to use te reo Māori appropriately, as there is a desire from developers.</p> <p>Therefore, the board asks that the policy is clarified to either:</p> <ul style="list-style-type: none"> • Provide a pathway for the use of non-gifted te reo Māori including appropriate council support, or • Explicitly state that non-gifted names are not anticipated to be used • The name needs to be practical in terms of length, so that the name will fit on a map • If a family name is used, that the living relatives have been contacted and asked in advance • The Board believes that feeling connected is facilitated by seeing yourself reflected in your local environment, which includes street names that reflect the diversity of the population, including gender and minority ethnic groups • In some instances, the names provided by developers for approval do not reflect this aspiration. Further inquiry has revealed that while developers may share this aspiration, they do not have access to: <ul style="list-style-type: none"> • All resources that may be available to understand the natural, and pre-colonial histories of a given place, or time to undertake thorough research • Do not have the confidence that using kupu Māori is appropriate or desired by mana whenua, or a strong relationship with mana whenua. The board recognises as well that relationships between all those seeking approval for names and mana whenua, would likely impose an unmanageable burden on mana whenua, although we defer to the view of mana whenua themselves on this issue • The council has a vibrant and deeply knowledgeable heritage team, with extensive knowledge of our city already. The Board's view is that the Council's Naming Policy should serve the Council's Heritage Strategy 2019-2029 • The Board would like to see Council leverage its existing knowledge and resource to assist developers seeking to name streets, for example by holding a register of road name suggestions available for use, along with the option to engage a historian or Community Stories Liaison to assist with history of an area • Have naming consistency across all sectors of Council • Request a review of current road names, with a view to correcting any misspellings, missing macrons etc <p>*See attachment</p>

25 August 2023

Engagement Team
engagement@ccc.govt.nz
Christchurch City Council
53 Hereford Street
Christchurch 8154

Beckenham Service Centre
03 941 6633
66 Colombo Street, Beckenham
PO Box 73027
Christchurch 8154
ccc.govt.nz

Hello,

Submission - Draft Naming Policy

The Waihoru Spreydon-Cashmere-Heathcote Community Board appreciates the opportunity to provide a submission to the Christchurch City Council on the Draft Naming Policy and thanks staff for the work done on this matter.

The Board's statutory role is, "to represent, and act as an advocate for, the interests of its community" (Local Government Act 2002, section 52). The Board provides this submission in its capacity as a representative of the communities in the Spreydon-Cashmere-Heathcote area.

Our Community Board Plan's vision is that "Spreydon-Cashmere-Heathcote is a place where people are actively engaged and contribute to thriving communities and environments, where they feel they belong and are safe and connected with each other". The Community Board believes that feeling connected is facilitated by seeing yourself reflected in your local environment, which includes street names that reflect the diversity of the population, including gender and minority ethnic groups.

The Board wishes to support the purpose of the draft policy, and would like to add:

- When the name is gifted from Mana Whenua, that Council accepts the gifted name.
- The Board is in support of the principle that mana whenua are only asked to gift names for significant places. This is appropriate and respectful of the mana of names and of the demands on mana whenua in this process.

We are concerned there is a risk that this may have an unintended consequence that less kupu Maori are used in naming.

Mana whenua may have the view that te reo should only be used for significant places. We would understand and accept that perspective.

In general terms the Board's view is that the use of te reo Maori in everyday settings is an important part of revitalising the language and making it accessible to all New Zealanders.

The Board recognises that developers often wish to use te reo Maori but have concerns around cultural appropriateness in the use of te reo, and wish to consult with mana whenua. Developers often lack expertise in this area. However, this imposes a demand on mana whenua to respond. The Board's view is that Council needs to provide support to developers to use te reo Maori appropriately, as there is a desire from developers.

Therefore, the board asks that the policy is clarified to either:

- provide a pathway for the use of non-gifted te reo Maori including appropriate council support, or
- explicitly state that non-gifted names are not anticipated to be used.

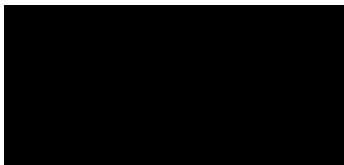
- The name needs to be practical in terms of length, so that the name will fit on a map.
- If a family name is used, that the living relatives have been contacted and asked in advance.
- The Board believes that feeling connected is facilitated by seeing yourself reflected in your local environment, which includes street names that reflect the diversity of the population, including gender and minority ethnic groups.

In some instances, the names provided by developers for approval do not reflect this aspiration. Further inquiry has revealed that while developers may share this aspiration, they do not have access to:

- All resources that may be available to understand the natural, and pre-colonial histories of a given place, or time to undertake thorough research.
 - Do not have the confidence that using kupu Māori is appropriate or desired by mana whenua, or a strong relationship with mana whenua. The board recognises as well that relationships between all those seeking approval for names and mana whenua, would likely impose an unmanageable burden on mana whenua, although we defer to the view of mana whenua themselves on this issue.
 - The council has a vibrant and deeply knowledgeable heritage team, with extensive knowledge of our city already. The Board's view is that the Council's Naming Policy should serve the Council's Heritage Strategy 2019-2029.
 - The Board would like to see Council leverage its existing knowledge and resource to assist developers seeking to name streets, for example by holding a register of road name suggestions available for use, along with the option to engage a historian or Community Stories Liaison to assist with history of an area.
- Have naming consistency across all sectors of Council.
 - Request a review of current road names, with a view to correcting any mis-spellings, missing macrons, etc.

The Board would like to speak to this submission.

Ngā mihi,



Callum Ward

Chairperson, Waihoru Spreydon-Cashmere-Heathcote Community Board

Submissions received on the Draft Naming Policy, August 2023

Submission on Outdoor Dining Policy - Waihoru Spreydon-Cashmere-Heathcote Community Board							
ID	Do you support the draft policy?	Parts of the policy you support	Parts of the policy you oppose	Feedback on the draft Outdoor Dining Guidelines and Standard Conditions	Should the policy do more to accommodate small businesses?	Provide your feedback here	
7080	Yes. See attachment.	<p>The Board supports the draft single policy as it is more user-friendly to better meet the needs of the hospitality industry and the wider community.</p> <p>The Board wishes to support the draft policy, in particular:</p> <p>That outdoor dining areas are accessible for all pedestrians including users of wheelchairs and mobility devices and for the visually impaired.</p> <p>As a place-making strategy, ie. turn little centres into villages, enhancing local social connection and cohesion.</p>					

25 August 2023

Danielle Endacott
Engagement Advisor
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Hello Danielle,

Submission Outdoor Dining Policy Review

The Waihoru Spreydon-Cashmere-Heathcote Community Board appreciates the opportunity to provide a submission to the Christchurch City Council on the Outdoor Dining Policy Review and thanks staff for the work done on this matter.

The Board's statutory role is, "to represent, and act as an advocate for, the interests of its community" (Local Government Act 2002, section 52). The Board provides this submission in its capacity as a representative of the communities in the Spreydon-Cashmere-Heathcote area.

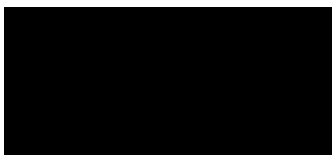
Our Community Board Plan's vision is that "Spreydon-Cashmere-Heathcote is a place where people are actively engaged and contribute to thriving communities and environments, where they feel they belong and are safe and connected with each other". There are a number of businesses in Waihoru Spreydon-Cashmere-Heathcote which hold licenses under the current outdoor dining policies under review. The Board supports the draft single-policy as it is more user-friendly to better meet the needs of the hospitality industry and the wider community.

The Board wishes to support the draft policy, in particular:

- That outdoor dining areas are accessible for all pedestrians including users of wheelchairs and mobility devices and for the visually impaired.
- As a place-making strategy, i.e., turn little centres into villages, enhancing local social connection and cohesion.

The Board would like to speak to this submission.

Ngā mihi,



Callum Ward

Chairperson, Waihoru Spreydon-Cashmere-Heathcote Community Board

Submissions received on the Draft Naming Policy, August 2023

Waitai Coastal-Burwood-Linwood Community Board - Submission on Draft Naming Policy		
ID	Do you support the draft policy?	Submitter Feedback
7056	Paul McMahon, Chairperson Waitai Coastal-Burwood-Linwood Community Board Submissions Committee	<p><i>Do you think updating the Naming Policy is necessary? Yes</i></p> <p>We accept the reasons stated in 3.3.</p> <p>Does 3.1a mean that the Council will, under this policy, request a Maori name for all suburban roads? If so, the Community Board supports this but suggests the onus be placed on developers rather than the Council to consult mana whenua.</p> <p>The criteria for giving a road a Māori name is unclear. The Board would like the default to be that there is always at least one Māori name provided as an option by developers for the Board to consider, with the onus on the developer to consult mana whenua rather than on the Council.</p> <p>*See attachment</p>

SUBMISSION TO: Christchurch City Council

ON: Draft Naming Policy

BY: Waitai Coastal-Burwood-Linwood Community Board

CONTACT: Paul McMahon
Chairperson, Submissions Committee
C/- PO Box 73023
CHRISTCHURCH 8154
021 184 1072
paul.mcmahon@ccc.govt.nz

1. INTRODUCTION

The Waitai Coastal-Burwood-Linwood Community Board appreciates the opportunity to make a submission to the Christchurch City Council on the Draft Naming Policy.

The Board wishes wish to be heard in support of this submission.

2. SUBMISSION

Do you think updating the Naming Policy is necessary?
Yes

Why did you say that?
We accept the reasons stated in 3.3.

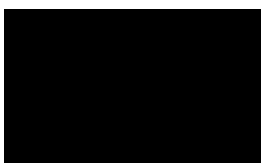
What is your area of interest?
• Roads

What part of the Draft Naming Policy would you like to comment on?
Part 2: Policies specific to the naming of roads

Please comment here:

Does 3.1a mean that the Council will, under this policy, request a Maori name for all suburban roads? If so, the Community Board supports this but suggests the onus be placed on developers rather than the Council to consult mana whenua.

The criteria for giving a road a Māori name is unclear. The Board would like the default to be that there is always at least one Māori name provided as an option by developers for the Board to consider, with the onus on the developer to consult mana whenua rather than on the Council.



Paul McMahon
Chairperson, Submissions Committee
WAITAI COASTAL-BURWOOD-LINWOOD COMMUNITY BOARD
21 August 2023

Submissions received on the Draft Naming Policy, August 2023

Halswell Residents Association - Submission on Draft Naming Policy		
ID	Name - Organisation	Submitter feedback
6389	Halswell Residents Association C/- David Hawke Secretary	<p><i>Do you think updating the Naming Policy is necessary? Yes</i></p> <p>Halswell Residents Association (Inc) is an incorporated society and a registered charity, and advocates for the interests of people in Halswell. Activities are largely carried out by a committee of 9 members, and we hold monthly meetings, open to the public. For submissions such as this, a draft is circulated to our committee and consensus obtained before the final version is submitted and minuted at the next monthly meeting. The Association Chairperson is John Bennett, David Hawke is Secretary and Adele Geradts is Treasurer.</p> <p>Our experience with the current naming process: Halswell has had a seemingly endless run of new subdivisions, with road names put forward by individual developers in adjoining subdivisions. This has meant that connector roads will change names going from one subdivision to the next; this is confusing to people trying to find their way around. A "good" example is the connector road south of Halswell Junction Road. It begins at the western end as Richmond Avenue, becomes Caulfield Avenue, then Skibereen Drive. Some of the names selected by a developer, and approved under current procedures, have been bizarre. A "good" example is Paradise Way, whose justification was that Paradise Shelducks live in the area. A consequence of having developers as the initiators of road naming is the perpetuation of colonial narratives for our area. Developers have been keen to reference their own colonial ancestors, which at one level is fine, but there hasn't been a countervailing narrative reflecting either Ngāi Tahu values or local ecology. (We have tried as below, but with mixed success.)</p> <p>Our experience with the different developers has been mixed, to say the least. In our first foray, we were approached by a developer for names relating to returned service people from our district. We supplied these, although implementation was complicated by the need for non-repetition of names across the city. Next, we were approached by a developer for ideas on road names. We agreed, and forwarded some ideas that included a suggestion that the developer engage the local rūnanga. We were then told that road naming was going to be looked after by the developer's Auckland office. As the deadline for road name approval approached, we supplied names on our own initiative, but were told by the developer that this is what they had wanted all along. The names finally approved were not ours but included gems such as "Cress Street" and "Fauna Street". In two other subdivisions, we approached the developers with an offer to be involved, but neither replied. Our most positive engagement has been with Your Section. The developer approached us for ideas. We supplied a comprehensive document (attached here as an Appendix), and the developer picked names that suited from their perspective. One of the names accepted by the developer was for a recently deceased person, and we did the legwork getting family approval. Overall, it was a good process though we were disappointed that our premise that road names should reflect the road's shape, the names of its neighbours and ecological connectivity's was lost. Naming of new parks and reserves seems opaque at best. Our experience is with a reserve at the southern end of the River Stone development, south of Glovers Road in Halswell. We were approached by the developer for road naming ideas. One of our proposed names for a major connector street within the subdivision was Otūmatua Drive, but this was not taken up by the developer. They used it instead for the reserve, i.e. Otūmatua Reserve, but we recall no commentary on this name from City Council staff and no discussion at Community Board. The current process has been hard work for our Community Board. There are limited options to deal with unsatisfactory names. Some elected members struggle to make decisions that match clear policy positions taken by City Council. An example here is with certain members refusing to support te reo Māori names "because they are hard to pronounce". Our Community Board has approved at least one extremely dubious name – Monsanto Street, in Knights Stream subdivision. Updating the Christchurch street and place names register on the Christchurch City Libraries website is slow; there have been no updates since February 2016.</p> <p>Our detailed response to the Draft Policy:</p> <ol style="list-style-type: none"> 1. Regarding Part 1, Paragraph 2 - Specific criteria for assessing names, there needs to be some provision added whereby an area-wide perspective is taken to ensure that particular narratives do not dominate. <ol style="list-style-type: none"> a. For example, recent road names in Halswell are dominated by subdivision developer perspectives. b. In our view, the former Riccarton Borough Council did a good job of naming streets around Riccarton back in the 1930s. Close to Pūtaringamotu Riccarton Bush, there is a good mix of Māori plant and animal names, then further out there is the usual mix of English names. 2. Regarding Part 1, Paragraph 3 - Criteria for requesting a Māori name, the word "will" needs to be replaced by "shall". Otherwise, there is a sense of the requirement being optional. 3. Regarding Part 1, Paragraph 6 - Names which do not meet the criteria for approval, we strongly support: <ol style="list-style-type: none"> a. 6.1b - Currently trading commercial organisations b. In Knights Stream subdivision in Halswell, we have "Monsanto Street". You will know Monsanto as the manufacturer of glyphosate ("Roundup"), the use of which has been controversial both locally and internationally. c. 6.1e- Names related to the developer of a subdivision d. In Halswell, developers have been able to successfully propose names linked to their families. This has led to a rather unbalanced range of names across the suburb.

Submissions received on the Draft Naming Policy, August 2023

	<p>Some thoughts on how the final Naming Policy might be implemented:</p> <ol style="list-style-type: none">1. The current roads and rights-of-way Naming Policy assumes that subdivision developers will apply for road names<ol style="list-style-type: none">a. In our view, subdivision developers shouldn't be responsible for proposing names, as they do at presentb. Although developers must market the properties they develop, their involvement with a subdivision ceases once it passes to City Council. A developer's involvement with a subdivision (typically less than 5 years) is therefore a tiny fraction of the overall lifespan of 150+ years 2. In our view, the following process should apply:<ol style="list-style-type: none">a. City Council staff propose names that meet the criteria in the draft policyb. The proposed names are listed in a register, and people wanting to object and with a genuine long-term stake in the process have (say) 14 days to say soc. A final decision is made by City Council staff and reported to Community Boardd. The final names are listed in a timely fashion in an easy to find, publicly available register. In contrast to the present process, subdivision developers do not propose names, Community Boards do not approve names, and the register of street names is regularly updated <p>*See attachment for appendix and image</p>
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Halswell
RESIDENTS ASSOCIATION (inc)

The Chairman:



Submission: Draft Naming Policy

Date: 23 August 2023

Wish to be heard: Yes

Standing: Halswell Residents Association (Inc.) is an incorporated society and a registered charity, and advocates for the interests of people in Halswell. Activities are largely carried out by a Committee of 9 members, and we hold monthly meetings open to the public. For submissions such as this, a draft is circulated to our committee and consensus obtained before the final version is submitted and minuted at the next monthly meeting.

The Association Chairperson is John Bennett; David Hawke is Secretary; Adele Geradts is Treasurer. The Association can be contacted by email at



Our experience with the current naming process

- Halswell has had a seemingly endless run of new subdivisions, with road names put forward by individual developers in adjoining subdivisions.
 - This has meant that connector roads will change names going from one subdivision to the next; this is confusing to people trying to find their way around.
 - A “good” example is the connector road south of Halswell Junction Road. It begins at the western end as Richmond Avenue, becomes Caulfield Avenue, then Skibereen Drive.
 - Some of the names selected by a developer, and approved under current procedures, have been bizarre.
 - A “good” example is Paradise Way, whose justification was that Paradise Shelducks live in the area.
 - A consequence of having developers as the initiators of road naming is the perpetuation of colonial narratives for our area.
 - Developers have been keen to reference their own colonial ancestors, which at one level is fine but there hasn’t been a countervailing narrative reflecting either Ngāi Tahu values or local ecology. (We have tried as below, but with mixed success.)
- Our experience with the different developers has been mixed, to say the least.
 - In our first foray, we were approached by a developer for names relating to returned service people from our district. We supplied these, although implementation was complicated by the need for non-repetition of names across the city.

- Next, we were approached by a developer for ideas on road names. We agreed, and forwarded some ideas that included a suggestion that the developer engage the local rūnanga. We were then told that road naming was going to be looked after by the developer's Auckland office. As the deadline for road name approval approached, we supplied names on our own initiative but were told by the developer that this is what they had wanted all along. The names finally approved were not ours but included gems such as "Cress Street" and "Fauna Street".
- In two other subdivisions, we approached the developers with an offer to be involved but neither replied.
- Our most positive engagement has been with Your Section. The developer approached us for ideas. We supplied a comprehensive document (attached here as an Appendix), and the developer picked names that suited from their perspective. One of the names accepted by the developer was for a recently deceased person, and we did the leg-work getting family approval. Overall, it was a good process though we were disappointed that our premise that road names should reflect the road's shape, the names of its neighbours, and ecological connectivities, was lost.
- Naming of new parks and reserves seems opaque at best.
 - Our experience is with a reserve at the southern end of the River Stone development south of Glovers Road in Halswell. We were approached by the developer for road naming ideas. One of our proposed names for a major connector street within the subdivision was Ōtūmatua Drive, but this was not taken up by the developer. They used it instead for the reserve, i.e. Ōtūmatua Reserve, but we recall no commentary on this name from City Council staff and no discussion at Community Board.
- The current process has been hard work for our Community Board.
 - There are limited options to deal with unsatisfactory names.
 - Some elected members struggle to make decisions that match clear policy positions taken by City Council. An example here is with certain members refusing to support te reo Māori names "because they are hard to pronounce".
 - Our Community Board has approved at least one extremely dubious name – Monsanto Street, in Knights Stream subdivision.
- Updating the Christchurch Street and Place Names register on the Christchurch City Libraries website is slow; there have been no updates since February 2016.

Our detailed response to the Draft Policy

1. Regarding Part 1, Paragraph 2 *Specific criteria for assessing names*, there needs to be some provision added whereby an area-wide perspective is taken to ensure that particular narratives do not dominate.
 - a. For example, recent road names in Halswell are dominated by subdivision developer perspectives.
 - b. In our view, the former Riccarton Borough Council did a good job of naming streets around Riccarton back in the 1930s. Close to Pūtaringamotu Riccarton Bush, there is a good mix of Māori plant and animal names then further out there is the usual mix of English names.
2. Regarding Part 1, Paragraph 3 *Criteria for requesting a Māori name*, the word "will" needs to be replaced by "shall". Otherwise, there is a sense of the requirement being optional.
3. Regarding Part 1, Paragraph 6 *Names which do not meet the criteria for approval*, we strongly support:
 - a. 6.1b *Currently trading commercial organisations*.

- i. In Knights Stream subdivision in Halswell, we have “Monsanto Street”. You will know Monsanto as the manufacturer of glyphosate (“Roundup”), the use of which has been controversial both locally and internationally.
- b. 6.1e *Names related to the developer of a subdivision.*
 - i. In Halswell, developers have been able to successfully propose names linked to their families. This has led to a rather unbalanced range of names across the suburb.

Some thoughts on how the final Naming Policy might be implemented

1. The current Roads and Rights-of-way Naming Policy assumes that subdivision developers will apply for road names.
 - a. In our view, subdivision developers shouldn't be responsible for proposing names, as they do at present.
 - b. Although developers must market the properties they develop, their involvement with a subdivision ceases once it passes to City Council. A developer’s involvement with a subdivision (typically less than 5 years) is therefore a tiny fraction of the overall lifespan of 150+ years.
2. In our view, the following process should apply:
 1. City Council staff propose names that meet the criteria in the draft policy;
 2. The proposed names are listed in a register, and people wanting to object and with a genuine long-term stake in the process have (say) 14 days to say so;
 3. A final decision is made by City Council staff and reported to Community Board.
 4. The final names are listed in a timely fashion in an easy to find, publicly available register.

In contrast to the present process, subdivision developers do not propose names, Community Boards do not approve names, and the register of street names is regularly updated.



We do not understand how the name of a well known chemical company involved in dubious health and safety practices came to be approved as a street name in Halswell. Maybe it could be a candidate for the re-naming provisions in the Draft Policy.

APPENDIX: Road names supplied by Halswell Residents Association to the developer of the River Stone subdivision

Applying natural and cultural values to proposed road names at Kennedys Bush / Glovers / SH 75

6 January 2022

Aim: to develop a coherent theme for road naming in the Kennedys Bush Road / Glovers Road / SH 75 block (“River Stone”) using natural and cultural values while meeting developer needs for marketing appeal and City Council requirements for policy compliance.

Relevant Strategies and Policies:

- Heritage Strategy (“identify... and celebrate heritage.... acknowledging and integrating Ngāi Tahu heritage and taonga”)
- Strengthening Communities Strategy (“giv[ing] people a sense of belonging and encourag[ing] them to take part in social, cultural, economic and political life”)
- Multicultural Strategy (“A diverse, inclusive and welcoming city”)
- Roads and Rights-of-way Naming Policy

Premise: road names should reflect the road’s shape, the names of its neighbours, and connectivities.

Top level theme: The names reflect former flora and fauna in a way that integrates the mana whenua status of Ngāi Tūāhuriri and Te Taumutu rūnanga.

Option 1 (preferred): Ōtūmatua Drive as the connector road from Candys Road into adjacent subdivision (ideally with the agreement of the developer). Ōtūmatua Drive is a substantial road whose twists and turns reflect the intertwining of Ōtūmatua with the lifeways of the two rūnanga and a connection with the Port Hills. Ōtūmatua has also been identified in the cultural narrative of Halswell School, is one of the blocks at Knights Stream School, and is the name of a significant sculpture in Knights Stream.

Number	Alternative 1	Explanation	Alternative 2	Explanation	Comments
	North of Ōtūmatua Drive (the extension of Candys Road)				Theme of forest animals that lived in the area.
1	Tuahiwi Street	A substantial road pointing roughly toward Tuahiwi, respecting the status of Ngāi Tūāhuriri Rūnanga and joined to road 10 (Taumutu Road) via Ōtūmatua Drive			

2	Tieke Street	A short street, whose placement with Tuka Street indicates that both lived together. Tieke is the saddleback, which lived in the forest that formerly covered the area.			
3	Pīpīpi Street	A short street, whose placement with Tuka Street indicates that both lived together in the forest that formerly covered the area. Pīpīpi is the brown creeper, a common forest bird in former times and still common on Banks Peninsula.			
4	Riroriro Street	A longer street, whose placement with Tuka Street indicates that both lived together in the forest that formerly covered the area. Riroriro is the grey warbler, commonly heard in Halswell Quarry.			
5	Piopio Place	A now-extinct bird formerly common along forest margins and riverbanks, hence its separation from the forest animals of roads 1-4.	Tuka Place	Tuka is the Canterbury name for “huhu”, whose galleries are often straight (along the axis of the tree).	
South of Ōtūmatua Drive (the extension of Candys Road)					Aquatic animals that lived in the area.
6	Arokehe Street	Large long-finned tuna, formerly widely distributed and an important source of mahinga kai. The shape of the road reflects the sinuous shape of tuna.			
7	Kākapowai Street	Dragonfly; abundant along the edges of running water and swampy			

		environments that formerly abounded in the area. Road is oriented roughly toward Huritini / Halswell River.			
8	Kākahi Street	Freshwater mussel; still found in Cashmere Stream, midden at Early Valley Road. Road is oriented roughly toward Huritini / Halswell River.			
9	Īnaka Street	“Whitebait”, formerly widespread and abundant. As a fish, it lived in streams next to the forest hence its separation from the forest animals of roads 1-5.			
10	Taumutu Street	A substantial road pointing roughly toward Taumutu, respecting the status of Te Taumutu Rūnanga and joined to road 1 (Tuahiwi Road) via Ōtūmatua Drive			
11	Upokororo Street	Extinct grayling, an herbivorous fish formerly widely distributed and very abundant.	Hao Street	A form of tuna (or eel) important as mahinga kai.	

Option 2: Riverstone Drive as the connector road referencing the name of the subdivision from Candys Road to the boundary of the adjacent subdivision; alternative could be Utopia Drive, having commonality with Paradise Way in Sabys Estate and being a common road name from the colonial era. Another alternative could be Jack Rogers Drive; Mr Rogers was one of the key drivers in the establishment of Halswell Quarry Park and a long-standing local resident. He was also a notable conscientious objector in WW2.

Number	Alternative 1	Explanation	Alternative 2	Explanation	Comments
North of Candys Road extension					
1	Tuka Street	A rather long and curvy street. Tuka is the Canterbury name for “huhu”, whose galleries have a long and sometimes convoluted shape.	Huhu Street	Huhu galleries have a long and sometimes convoluted shape, and provide homes	Notwithstanding Herries Beattie identifying tuka, huhu is now widely

				for many other invertebrates eg tree wētā	used in Canterbury (C. Pauling)
2	Tieke Street	A short street, whose placement with Tuka Street indicates that both lived together. Tieke is the saddleback, which lived in the forest that formerly covered the area.			
3	Pīpipi Street	A short street, whose placement with Tuka Street indicates that both lived together. Pīpipi is the brown creeper, a common forest bird in former times and still common on Banks Peninsula.			
4	Riroriro Street	A longer street, whose placement with Tuka Street indicates that both lived together in the forest that formerly covered the area. Riroriro is the grey warbler, commonly heard in Halswell Quarry.			
5	Piopio Place	A now-extinct bird formerly common along forest margins and riverbanks, hence its separation from the forest animals of roads 1-4.	Īnaka Street	“Whitebait”, formerly widespread and abundant. As a fish, it lived in streams next to the forest hence its separation from the forest animals of roads 1-4.	
South of Candys Road extension					
6	Tieke Street	A short street, whose placement with Ōtūmatua Drive reflects common links to Banks Peninsula. Tieke retreated to these hills with European colonisation,			

		and Ōtūmatua is topographically part of Banks Peninsula.			
7	Hao Street	A form of tuna (or eel). As a fish, it lived in streams next to the forest hence its separation from the forest animals of roads 1-4.			
8	Kākahi Street	Freshwater mussel; still found in Cashmere Stream, midden at Early Valley Road.			
9	Ōtūmatua Drive	A substantial road whose twists and turns reflect the intertwining of this local feature with the lifeways of the two rūnanga. This feature has also been identified in the cultural narrative of Halswell School, and is one of the blocks at Knights Stream School.	Tuka Street	Tuka is the Canterbury name for “huhu”, whose galleries have a long and sometimes convoluted shape.	
10	Tuahiwi Street	A substantial road pointing roughly toward Tuahiwi, respecting the status of Ngāi Tūāhuriri Rūnanga and joined to road 11 (Taumutu Road) via road 9 (Otumatua Drive)			
11	Taumutu Street	A substantial road pointing roughly toward Taumutu, respecting the status of Te Taumutu Rūnanga and joined to road 10 (Tuahiwi Road) via road 9 (Otumatua Drive)			

Submissions received on the Draft Naming Policy, August 2023

Disabled Persons Assembly - Submission on Draft Naming Policy		
ID	Name - Organisation	Submitter feedback
250823	Disabled Persons Assembly Chris Ford Regional Policy Advisor (Local Government)	<p>DPA welcomes the opportunity to feedback on the Christchurch City Council's Draft Naming Policy.</p> <p>We agree with all the key recommended changes outlined in the policy.</p> <p>In this brief submission, we recommend that the contributions of prominent deceased disabled people in Christchurch be recognised through being included in street, building and park/reserve names.</p> <p>We already appreciate and applaud the example of the CCC naming one of its new recreational and sporting facilities the Graham Condon Recreation and Sport Centre after the late disabled Paralympian and city councillor.</p> <p>Other deceased disabled people who should now be honoured as well, (if they have not already been), include the late former Mayoress of the city, disability advocate and one of the founders of DPA, Alexia Pickering.</p> <p>The naming of parks, facilities, and streets after them and other prominent disabled people would continue to send a signal to disabled people themselves that our leadership, both within the disabled and wider communities is important, and to non-disabled people that disabled people have made contributions to the life of the city in the past and will continue to do so.</p> <p>DPA has two brief recommendations.</p> <p>The first is that the CCC approaches community organisations representing key demographics including Māori, Pasifika, disabled, ethnic community, rainbow community, and women on a regular basis to nominate prominent past Christchurch people for inclusion on the naming lists for new streets, reserves, buildings and parks that council has control over.</p> <p>Recommendation 1: that the CCC approach community organisations representing key population groups including disabled people for them to nominate prominent people from within their communities for inclusion on Council naming lists.</p> <p>DPA believes that this should continue to be done on the proviso that the family/whānau of the person being nominated for a naming honour give their consent to this occurring in each case.</p> <p>The second is that the Council consider the placement of signage on any newly named street, road, reserve or other facility briefly explaining the background to the naming of that facility, place or road and that information about the origins of named places and facilities also be placed on the CCC website for future historical reference.</p> <p>This will enable people to better understand the origins of any place or feature named by Council so that this is explained to both current and future generations, including where this pertains to prominent disabled people.</p> <p>If a place name remembers an important historical individual, family or whānau, then the significance of why that place was named after that person, family or whānau can be better explained to both their descendants and residents as well.</p> <p>Recommendation 2: that the CCC consider installing small brief informative signage on any facility, reserve, park, road, or street that is named by it and that this information is also made available online.</p> <p>*See attachment</p>



Disabled Persons Assembly NZ

August 2023

To Christchurch City Council

Please find attached DPA's submission on Draft Naming Policy

For any further inquiries, please contact:

Chris Ford

Kaituhotuho Kaupapa Here ā Rohe - Regional Policy Advisor (Local Government)



Introducing Disabled Persons Assembly NZ

We work on systemic change for the equity of disabled people

Disabled Persons Assembly NZ (DPA) is a not-for-profit pan-impairment Disabled People's Organisation run by and for disabled people.

We recognise:

- Māori as Tangata Whenua and [Te Tiriti o Waitangi](#) as the founding document of Aotearoa New Zealand;
- disabled people as experts on their own lives;
- the [Social Model of Disability](#) as the guiding principle for interpreting disability and impairment;
- the [United Nations Convention on the Rights of Persons with Disabilities](#) as the basis for disabled people's relationship with the State;
- the [New Zealand Disability Strategy](#) as Government agencies' guide on disability issues; and
- the [Enabling Good Lives Principles](#), [Whāia Te Ao Mārama: Māori Disability Action Plan](#), and [Faiva Ora: National Pasifika Disability Disability Plan](#) as avenues to disabled people gaining greater choice and control over their lives and supports.

UN Convention on the Rights of Persons with Disabilities

DPA was influential in creating the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD),¹ a foundational document for disabled people which New Zealand has signed and ratified, confirming that disabled people must have the same human rights as everyone else. All state bodies in New Zealand, including local and regional government, have a responsibility to uphold the principles and articles of this convention. There are a number of UNCRPD articles particularly relevant to this submission, including:

- **Article 3 – General principles**
- **Article 9 – Accessibility**

- **Article 19 – Living independently and being included in the community**

New Zealand Disability Strategy 2016-2026

Since ratifying the UNCRPD, the New Zealand Government has established a Disability Strategy² to guide the work of government agencies on disability issues. The vision is that New Zealand be a non-disabling society, where disabled people have equal opportunity to achieve their goals and aspirations, and that all of New Zealand works together to make this happen. It identifies eight outcome areas contributing to achieving this vision. There are a number of Strategy outcomes particularly relevant to this submission, including:

- **Outcome 5 – Accessibility**
- **Outcome 8 - Leadership**

The Submission

DPA welcomes the opportunity to feedback on the Christchurch City Council's Draft Naming Policy.

We agree with all the key recommended changes outlined in the policy.

In this brief submission, we recommend that the contributions of prominent deceased disabled people in Christchurch be recognised through being included in street, building and park/reserve names.

We already appreciate and applaud the example of the CCC naming one of its new recreational and sporting facilities the Graham Condon Recreation and Sport Centre after the late disabled Paralympian and city councillor.

Other deceased disabled people who should now be honoured as well (if they have not already been) include the late former mayoress of the city, disability advocate and one of the founders of DPA, Alexia Pickering.

The naming of parks, facilities and streets after them and other prominent disabled people would continue to send a signal to disabled people themselves that our

leadership, both within the disabled and wider communities is important, and to non-disabled people that disabled people have made contributions to the life of the city in the past and will continue to do so.

DPA has two brief recommendations.

The first is that the CCC approaches community organisations representing key demographics including Māori, Pasifika, disabled, ethnic community, rainbow community, and women on a regular basis to nominate prominent past Christchurch people for inclusion on the naming lists for new streets, reserves, buildings and parks that council has control over.

Recommendation 1: that the CCC approach community organisations representing key population groups including disabled people for them to nominate prominent people from within their communities for inclusion on Council naming lists.

DPA believes that this should continue to be done on the proviso that the family/whānau of the person being nominated for a naming honour give their consent to this occurring in each case.

The second is that the Council consider the placement of signage on any newly named street, road, reserve or other facility briefly explaining the background to the naming of that facility, place or road and that information about the origins of named places and facilities also be placed on the CCC website for future historical reference.

This will enable people to better understand the origins of any place or feature named by Council so that this is explained to both current and future generations, including where this pertains to prominent disabled people.

If a place name remembers an important historical individual, family or whānau, then the significance of why that place was named after that person, family or whānau can be better explained to both their descendants and residents as well.

Recommendation 2: that the CCC consider installing small brief informative signage on any facility, reserve, park, road or street that is named by it and that this information is also made available online.

Submissions received on the Draft Naming Policy, August 2023

Cass Bay Residents Association - Submission on Draft Naming Policy		
ID	Name - Organisation	Submitter feedback
7036	Cass Bay Residents Association C/- Jenny Healey Chairperson	<i>Do you think updating the Naming Policy is necessary?</i> Yes I think consistency is important and with the increased use of the original Maori names it is important to know what is culturally appropriate and not confusing.

Submissions received on the Outdoor Dining Policy, August 2023

Cancer Society, Canterbury/West Coast Division - Submission on Outdoor Dining Policy							
ID	Name- Organisation	Do you support the draft policy?	Parts of the policy you support	Parts of the policy you oppose	Feedback on the draft Outdoor Dining Guidelines and Standard Conditions	Should the policy do more to accommodate small businesses?	Provide your feedback here
7180	Amanda Dodd Deputy Manager Health Promotion Cancer Society Canterbury/West Coast Division Cancer Society	*See attachment					



Submission in response to Christchurch City Council Draft Outdoor Dining in Public Places Policy.

This submission was completed by:

Amanda Dodd Deputy Manager, Health Promotion Cancer Society Canterbury West Coast Division.

Email: [REDACTED]

Tel: [REDACTED]

Cancer Society is hugely supportive of the intent of this Draft Outdoor Dining in Public Places Policy, particularly section 6.6.3 which stipulates that 'Every outdoor dining area is required to display smoke-free and vape-free signage. No ashtrays or other receptacles for smoking or vaping litter are permitted in an outdoor dining area'.

We would encourage Council to endorse this draft policy and move to implementing point 6.6.3.

Cancer Society believe that implementing point 6.6.3 will strengthen commitment to the Smokefree 2025 goal for Aotearoa and support the de-normalisation of smoking and vaping behaviours in public spaces, this in turn with strengthen implementation of the 'Smokefree Aotearoa Action Plan 2025'.

Cancer Society acknowledges the ongoing leadership of Christchurch City Council in extending and implementing strong Smokefree and Vapefree Policy across public spaces over the years.

Background: Smokefree outdoor dining areas are becoming more commonplace in New Zealand. ^{i ii iii} and Australia. ^{iv v} Smokefree outdoor areas also have significant support among the public, both in New Zealand and overseas. ^{vi vii viii ix}

Inspired by this momentum, the Fresh Air Project (smokefree outdoor dining) developed in partnership by Cancer Society Canterbury -West Coast Division and Canterbury District Health Board (now Te Mana Ora) with support from Christchurch City Council ran a 6 month pilot between 1 November 2016 and 30 April 2017.

The Fresh Air Project (FAP) was the first evaluated smokefree outdoor dining initiative for New Zealand. Cancer Society and Community and Public Health (CPH – now Te Mana Ora) staff worked alongside hospitality venues to implement one hundred percent smokefree and vapefree outdoor dining, providing support, resources, and promotion. 19 owner/managers of the 20 participating hospitality venues across Christchurch and Selwyn completed a questionnaire prior to the start of the pilot. The most common reasons for introducing smokefree outdoor dining areas were to create a healthier and more pleasant environment for customers and staff and reduce second hand smoke

(SHS) drift. The majority of respondents received positive feedback from customers about introducing smokefree outdoor dining areas, and only three respondents received negative feedback.

Almost all respondents felt that it was either easy (61.1%, n=11) or relatively easy (33.3%, n=6) to introduce smokefree outdoor dining. The remaining one respondent (5.6%) felt that introducing smokefree outdoor dining areas was neither easy nor challenging. No respondents felt that the introduction of smokefree outdoor dining areas to their venue was challenging. Support from customers visiting the Christchurch pilot venues was high with 95% of the 1,861 customers who gave feedback, in support of Smokefree outdoor dining. ^x

Post FAP pilot, other regions have implemented Fresh Air initiatives and FAP venues can now be found in Akaroa, Selwyn, Mid Canterbury, North Canterbury, South Canterbury (Mackenzie and Geraldine) Nelson and Tasman, Otago-Southland, Wairarapa and Whangarei.

Not all FAP initiatives have followed a pilot model but for those that have, their evaluations have found similar results to the Christchurch pilot. Otago-Southland had 94% support from 1542 customers who gave feedback, Whangarei also had 94% support from 442 customers who gave feedback. ^{xi}

Whilst the Fresh Air Project has taken root in other regions many other hospitality venues have gone smokefree independently and other councils have implemented or supported smokefree outdoor dining in other ways. Palmerston North for example, was the first city in New Zealand to introduce smokefree outdoor dining measures through a bylaw. In 2016 Council introduced new smokefree rules for outdoor dining on Council footpaths. In an evaluation of the bylaw implementation 68% of the 41 businesses that have complied with the new permit condition had found the impact had been neutral (68%), 12% (n=5) of premises rated the impact as positive and 20% (n=8) rated impact as negative. ^{xii}

Auckland Council added a smokefree requirement to outdoor dining licences in 2018 to make outdoor dining areas smokefree in the restaurants, bars and cafés that have a licence with council to use the footpath and/or public space. ^{xiii}

Ashburton District Council endorsed the Smokefree 2025 goal in 2017 but was an early adopter of smokefree outdoor areas with its first smokefree playground back in 2006. Since 2017, smokefree outdoor dining has been promoted via its 'Use of Pavement Alfresco Dining Policy' which prohibits "smoking on all footpath areas used for dining with or without alcohol" ^{xiv}

Extending coverage of smokefree vapefree spaces via the outdoor dining in public places policy is consistent with Christchurch City Council's progressive smokefree leadership and with the councils' community outcomes for resilient communities – **Safe and healthy** communities and for a **healthy environment** which supports biodiversity and **waste minimisation**. Approx 7 million dollars are spent dealing with marine pollution and waste management across N.Z. It is estimated that cigarette butt litter makes up between 19% and 38% of total debris in ocean clean ups. ^{xv}

Including vaping in the Draft outdoor dining policy is particularly timely and would demonstrate acknowledgement of the widespread community concern about the growth in uptake of vaping amongst rangatahi, particularly by young people who have never smoked. For example, Vape Free Kids NZ recently presented a petition to parliament asking for more protections to reduce vaping uptake in rangatahi. They amassed more than 12,000 signatures in support. ^{xvi}

Supporting more environments that are smokefree / vapefree offer positive role modelling to young people and support those trying to quit smoking and then transition from vaping to being smokefree.

In the words of Fresh Air Project Venues:

“In May 2018 all (then 18) Coffee Culture stores joined the Fresh Air Project to implement smokefree and vapefree outdoor dining spaces. Since then, we’ve had fantastic feedback from our guests who can now enjoy a coffee out in the fresh air with no concerns about second hand smoke. It’s great that staff are no longer cleaning out ashtrays, picking up butts or walking through smoke as they go about their jobs. It’s been a great move for us.”

Sacha Coburn, Director & C.O.O Coffee Culture – May 2021

“We are a family friendly café, so providing a smokefree and vapefree dining experience fitted well with us. We have great food and coffee for all to enjoy in a clean and fresh environment”.

Nigel Heney Owner Columbus Coffee Ashburton – May 2021

What customers said:

‘It’s nice to sit outside with actual fresh air, not smoke air’. Female aged 20-29

‘I live in Perth, Australia where you cannot smoke outside in the food venue. I was shocked NZ has not brought this in’. Female aged 30-39

‘As an occasional smoker, I like to separate myself so others don’t have to breath my second hand smoke as that’s just not nice’. Female aged 30-39

‘Well overdue. Smoke / smell always gets inside’. Male aged 60-69

‘Any way that is effective to discourage smoking!!’ Male aged 40-49

‘We need more of these (smokefree) places’. Male aged 60-69

As a continuation of our collaboration with Christchurch City Council and the hospitality sector Cancer Society is well placed to support venues to implement smokefree and vapefree outdoor dining with free signage and one to one support if needed. We urge council to adopt the ‘Draft Outdoor Dining in Public Places Policy’ and move to implementation as it is well received by the public, easy to implement and supports health of wellbeing of customers and staff, residents and visitors alike.

Cancer Society would welcome the opportunity to talk to council directly at the associated hearings.

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xiii Smokefree Policy update: Auckland Council <https://bid.aucklandcouncil.govt.nz/Documents/smokefree-update.pdf>

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xvi <https://www.newshub.co.nz/home/new-zealand/2023/08/vape-free-kids-nz-hands-over-petitions-to-parliament-calling-for-tougher-measures-to-protect-kids-from-vaping.html>

Submissions received on the Outdoor Dining Policy, August 2023

Living Streets Aotearoa - Submission on Outdoor Dining Policy							
ID	Name- Organisation	Do you support the draft policy?	Parts of the policy you support	Parts of the policy you oppose	Feedback on the draft Outdoor Dining Guidelines and Standard Conditions	Should the policy do more to accommodate small businesses?	Provide your feedback here
7183	Carina Duke, Executive member, Living Streets Aotearoa	Somewhat	<p>Outdoor dining provides great CPTED and brings life to the streets and it is important that the footpaths remain accessible for all pedestrians including those visiting businesses.</p> <p>Support the objectives and particularly: Maintain pedestrian priority, by ensuring safe, adequate and predictable pathways along footpaths suitable for all pedestrians, including wheelchair and mobility scooter users; Ensure that outdoor dining activities are carried out in a manner which is consistent with the Council's bylaws, strategies, policies and plans;</p> <p>Explanatory note: Particular regard will be given to the Smokefree and Vapefree Public Places Policy and the Equity and Access for People with Disabilities Policy.</p> <p>And</p> <p>6.3.1 Particular regard will be given to ensuring that: An accessible pathway is provided for pedestrians of all ages and abilities on any footpath adjoining an outdoor dining area. The dining area itself is accessible for pedestrians of all ages and abilities.</p> <p>To ensure that an accessible, safe and predictable pathway is provided means having the continuous accessible path of travel adjacent to the building line and not to require a change of direction/s along a footpath to continue your journey.</p>	<p>One of the issues with dining areas placed against a building line is the creation of a barrier in the continuous accessible path of travel. To manage how people with a vision impairment are able to detect and navigate around the barrier a detectable feature is required (tactile and visual) to prevent continual obstruction by the barrier. NZ Standard 4121 Section 13.2.3 requires permanent and temporary obstructions to have a feature within 150 mm of the ground that will be detectable by a person using a white cane and be colour contrasted to the surroundings. It is not reasonable to expect a person with a white cane to continually get their cane caught in the dining chairs and tables while they try to navigate their way along the footpath. A feature such as garden boxes or fence also ensures the dining area is not spread by customers or commercial businesses. The use of physical features reliant only on visual detection is not accessible for everyone and can lead to avoidance of an area and loss of choice.</p> <p>The height of barriers should have a 1 000 mm minimum to increase detection and prevent becoming a trip hazard.</p> <p>Umbrella clearance should have a 2000 mm clearance requirement as per NZ Standard 4121 Section 13.2.2 not 1 800 mm minimum as currently shown in the draft.</p>	Monitoring is essential to the guidelines and conditions being adhered to. How is this to be managed?	Somewhat	Business accommodation should not be put above the rights of pedestrians and the accessibility for all pedestrians.

Submissions received on the Outdoor Dining Policy, August 2023

		<p>For those who have a vision impairment the building line provides navigational and orientation cues. The kerb line normally contains posts, parking meters and other street furniture, including bike racks. Locating entrances is easier when travelling close to the building line. The objectives in point 5.1 if followed, would ensure priority for pedestrians. An accessible pathway is not just minimum widths - consider effort, legibility, consistency, barrier free and logical.</p> <p>Great to see verandas being prioritised to provide protection for pedestrians and the requirement for dining areas themselves to be accessible.</p> <p>Great to see that separate advertising will not be permitted. Currently this is an issue in many parts of the city where additional boards are placed narrowing the footpath to advertise daily specials etc.</p> <p>Great to see the requirement to keep menu boards within the boundaries as this is an issue with no detectable features to within 150mm of the ground and the boards placed to extend over the fencing or completely external to the dining area.</p>				
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Submissions received on the Outdoor Dining Policy, August 2023

Vieceli Hospitality - Submission on Outdoor Dining Policy							
ID	Name- Organisation	Do you support the draft policy?	Parts of the policy you support	Parts of the policy you oppose	Feedback on the draft Outdoor Dining Guidelines and Standard Conditions	Should the policy do more to accommodate small businesses?	Provide your feedback here
7170	Louis Vieceli Director / Owner Vieceli Hospitality	No. See attachment.		<p>Vieceli Hospitality own and operate the venues Amazonita, The Bangalore Polo Club, and Delilah on Oxford Terrace. We are long term investors in the Christchurch Central City, going back to the 1990s. We consider The Terrace to serve a pivotal role in the future of Christchurch's hospitality scene and are committed to being part of that future.</p> <p>The Draft Outdoor Dining in Public Places Policy, and its accompanying Outdoor Dining Guidance document are very troubling to us. We recommend large changes so as to achieve the stated aim of bringing vibrancy and buzz to our central city.</p> <p>Draft Outdoor Dining in Public Places Policy 4.1, a licence does not grant exclusive use of an area or create a property right and the general public have the right to pass through an outdoor dining area at any time.</p> <p>Outdoor Dining Guidance Code of Conduct for licensees.</p> <p>A licence does not allow exclusive use of an area so pedestrians have the right to pass through the outdoor dining areas at all times.</p> <p>Outdoor Dining Guidance > Standard Conditions > Other</p> <p>22. All alcohol licensing and health requirements are to be observed. The above regulations are both confusing and impractical. We are required to allow the general public access to the outdoor dining area even though this is in direct contradiction to our obligations under the Sale of Alcohol Act 2012 which specifically requires us to deny access to licensed areas to certain people. In addition to this our right to deny access to certain undesirable people is in fact necessary to maintain business integrity and provide a safe and enjoyable space for our patrons. It seems we are expected to control the space without the ability to regulate access to the space, which is untenable.</p>		Yes	We have also email this to letstalk@ccc.govt.nz (See attachment).

Submissions received on the Outdoor Dining Policy, August 2023

				<p>Draft Outdoor Dining in Public Places Policy > 6.6.3</p> <p>Every outdoor dining area is required to display smoke-free and vape-free signage.</p> <p>Outdoor Dining Guidance > Standard Conditions > Furniture and equipment</p> <p>3. Outdoor dining areas are to display smoke and vape-free signage.</p> <p>Whilst promoting a smoke and vape-free environment might feel commendable, the imposition of a mandatory smoke and vape-free policy in outdoor dining areas is overly restrictive and doesn't consider the rights of the 380,000 New Zealanders who choose to smoke daily, or the 250,000 who choose to vape daily. Forcing a blanket policy on all businesses without considering the preferences and choices of customers is an overreach of regulation.</p> <p>Outdoor Dining Guidance > Umbrellas</p> <p>Use of a single colour for canopies to minimise visual clutter and compliment building façade.</p> <p>This regulation unnecessarily limits creative freedom and branding choices for private business. Whilst the intention to ensure a visually cohesive and harmonious streetscape is understandable, this will undermine the diversity and uniqueness that outdoor dining areas can bring to the city's atmosphere. There is also no provision for dealing with the many businesses that have spent considerable money, time and effort in creating a space that brings vibrancy and buzz to our central city, and made choices that do not comply with the new regulations. Are they to be made to purchase replacement canopies? Will any be grand-fathered in?</p> <p>Outdoor Dining Guidance > Standard Conditions > Furniture and equipment</p> <p>10. All furniture and equipment is to be stored inside the premises at the end of each trading day.</p> <p>Outdoor Dining Guidance > Standard Conditions > Other</p>			
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Submissions received on the Outdoor Dining Policy, August 2023

				<p>19. Outside of the approved hours of use, all outdoor dining furniture and equipment must be removed from the licensed area and stored in private premises.</p> <p>Requiring all businesses to remove outdoor dining furniture and equipment is overly restrictive and impractical, not taking into account the intricacies of the specific business. It forces businesses to spend unnecessary time and effort on moving furniture, placing them under undue financial burden. This goes against what has been the status quo for more than twenty years; the existing system works quite well, actually.</p> <p>Outdoor Dining Guidance > Standard Conditions > Other</p> <p>24. The area covered by this licence may not be used for live entertainment and speakers or amplifiers may not be placed or used in or on the area.</p> <p>Blanket rules restricting the use of outdoor dining areas for live entertainment is arbitrary and limits the potential of these spaces. It directly contradicts the supposed desire to bring vibrancy and buzz to our central city. Once again, this goes against the status quo. Live entertainment, and indeed music played through outside speakers, contributes positively to the atmosphere of the space, enhancing the experience for customers. This regulation will stifle creativity and innovation in the hospitality sector.</p> <p>In summary, whilst the aim of regulating outdoor dining areas is to ensure safety, accessibility, and a positive experience for the public, the abovementioned sections are overly restrictive and lack consideration for the rights and autonomy of businesses. These restrictions will hinder businesses ability to create inviting spaces, contribute to their own distinct brand, and ultimately provide a more enjoyable experience for customers.</p> <p>Post earthquake we have had the opportunity to make Christchurch the most exciting and vibrant city in Australasia. This proposed very restrictive policy does not take advantage of this unique opportunity, it must not proceed.</p>			
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Vieceli Hospitality own and operate the venues Amazonita, The Bangalore Polo Club, and Delilah on Oxford Terrace. We are long term investors in the Christchurch Central City, going back to the 1990s. We consider 'The Terrace' to serve a pivotal role in the future of Christchurch's hospitality scene and are committed to being part of that future.

The Draft Outdoor Dining in Public Places Policy, and its accompanying Outdoor Dining Guidance document are very troubling to us. We recommend large changes so as to achieve the stated aim of 'bringing vibrancy and buzz to our central city'.

Draft Outdoor Dining in Public Places Policy > 4.1

"...a licence does not grant exclusive use of an area or create a property right and the general public have the right to pass through an outdoor dining area at any time."

Outdoor Dining Guidance > Code of Conduct for licensees

"A licence does not allow exclusive use of an area so pedestrians have the right to pass through the outdoor dining areas at all times."

Outdoor Dining Guidance > Standard Conditions > Other

22. *"All alcohol licensing and health requirements are to be observed."*

The above regulations are both confusing and impractical. We are required to allow the general public access to the outdoor dining area even though this is in direct contradiction to our obligations under the Sale of Alcohol Act 2012 which specifically requires us to deny access to licensed areas to certain people. In addition to this our right to deny access to certain undesirable people is in fact necessary to maintain business integrity and provide a safe and enjoyable space for our patrons. It seems we are expected to 'control' the space without the ability to regulate access to the space, which is untenable.

Draft Outdoor Dining in Public Places Policy > 6.6.3

"Every outdoor dining area is required to display smoke-free and vape-free signage."

Outdoor Dining Guidance > Standard Conditions > Furniture and equipment

3. *"Outdoor dining areas are to display 'smoke and vape-free' signage."*

Whilst promoting a smoke and vape-free environment might feel commendable, the imposition of a mandatory smoke and vape-free policy in outdoor dining areas is overly restrictive and doesn't consider the rights of the 380,000 New Zealanders who choose to smoke daily, or the 250,000 who choose to vape daily. Forcing a blanket policy on all businesses without considering the preferences and choices of customers is an overreach of regulation.

Outdoor Dining Guidance > Umbrellas

"Use of a single colour for canopies to minimise visual clutter and compliment building façade."

This regulation unnecessarily limits creative freedom and branding choices for private business. Whilst the intention to ensure a visually cohesive and harmonious streetscape is understandable, this will undermine the diversity and uniqueness that outdoor dining areas can bring to the city's atmosphere. There is also no provision for dealing with the many businesses that have spent considerable money, time and effort in creating a space that 'brings vibrancy and buzz to our central city', and made choices that do not comply with the new regulations. Are they to be made to purchase replacement canopies? Will any be 'grandfathered' in?

Outdoor Dining Guidance > Standard Conditions > Furniture and equipment

10. *"All furniture and equipment is to be stored inside the premises at the end of each trading day..."*

Outdoor Dining Guidance > Standard Conditions > Other

19. *"Outside of the approved hours of use, all outdoor dining furniture and equipment must be removed from the licensed area and stored in private premises..."*

Requiring all businesses to remove outdoor dining furniture and equipment is overly restrictive and impractical, not taking into account the intricacies of the specific business. It forces businesses to spend unnecessary time and effort on moving furniture, placing them under undue financial burden. This goes against what has been the status quo for more than twenty years; the existing system works quite well, actually.

Outdoor Dining Guidance > Standard Conditions > Other

24. *"The area covered by this licence may not be used for live entertainment and speakers or amplifiers may not be placed or used in or on the area."*

Blanket rules restricting the use of outdoor dining areas for live entertainment is arbitrary and limits the potential of these spaces. It directly contradicts the supposed desire to 'bring vibrancy and buzz to our central city'. Once again, this goes against the status quo. Live entertainment, and indeed music played through outside speakers, contributes positively to the atmosphere of the space, enhancing the experience for customers. This regulation will stifle creativity and innovation in the hospitality sector.

In summary, whilst the aim of regulating outdoor dining areas is to ensure safety, accessibility, and a positive experience for the public, the above mentioned sections are overly restrictive and lack consideration for the rights and autonomy of businesses. These restrictions will hinder businesses' ability to create inviting spaces, contribute to their own distinct brand, and ultimately provide a more enjoyable experience for customers.

Post earthquake we have had the opportunity to make Christchurch the most exciting and vibrant city in Australasia. This proposed very restrictive policy does not take advantage of this unique opportunity, it must not proceed.

Submissions received on the Outdoor Dining Policy, August 2023

Terrace Hospitality Group - Submission on Outdoor Dining Policy							
ID	Name- Organisation	Do you support the draft policy?	Parts of the policy you support	Parts of the policy you oppose	Feedback on the draft Outdoor Dining Guidelines and Standard Conditions	Should the policy do more to accommodate small businesses?	Provide your feedback here
7199	Jo Appleyard, THG Terrace Hospitality Group	See attachment.					

SUBMISSION ON CHRISCHURCH CITY COUNCIL'S OUTDOOR DINING POLICY REVIEW BY THE TERRACE HOSPITALITY GROUP

To: Christchurch City Council

Name of submitter: Max Bremner on behalf of The Terrace Hospitality Group

EXECUTIVE SUMMARY

- 1 This is a submission on Christchurch City Council's (*Council*) Outdoor Dining Policy review, including the Draft Policy and draft Outdoor Dining Guidelines and standard conditions (*Policy Review*).
- 2 This submission is made by Max Bremner, who is reflecting feedback from a number of hospitality businesses operating along the Terrace, Christchurch (the *Terrace Hospitality Group (THG)*). This submission is made on behalf of the THG and a number of members will wish to speak to it.
- 3 The THG welcome this opportunity to provide feedback on the Policy Review. The THG have a significant interest in how the Policy Review will impact on the provision of outdoor dining in Christchurch City. The THG acknowledges the importance of appropriately managing outdoor dining activities to ensure a well-functioning City.
- 4 The THG are deeply committed to supporting the growth of the visitor and resident economy in Christchurch into the future and it wants to work collaboratively with Christchurch City Council on policy solutions that deliver positive outcomes for local jobs, the broader economy and a diverse group of stakeholders. Simple, clear and reasonable policy guidance and conditions for outdoor dining licences will enable the THG to responsibly and respectfully continue to contribute to the district and the wider regional economy.
- 5 Christchurch is still in the process of recovery and regeneration after the 2010 and 2011 Canterbury Earthquakes. A key part of long-term recovery is promotion of a vibrant, prosperous city centre and economy recovery in the district. Outdoor dining, such as that offered along the Terrace by the THG, has a key role to play in this recovery.
- 6 In addition, the hospitality industry continues to suffer the impacts of the COVID-19 pandemic. Policy that unjustifiably restricts the outdoor dining experience will materially affect the vibrancy and prosperity of the Christchurch City.
- 7 Not only does outdoor dining offer a wider range of dining options to complement indoor dining, it attracts and facilitates a broader range of visitors to the THG businesses. This is a vital contribution to the local economy and a key driver of growth and prosperity. A thriving dining experience will strengthen Christchurch's role in the national hospitality network and maximise dining opportunities.
- 8 That said, the current Policy Review has come as a huge shock and is very concerning to the TGH. It is far more wide reaching and impacts more significantly on the rights of the general public than central government legislation and duplicates and is far more draconian than the rules in the District Plan which have been decided after a proper hearing process.

9 Despite questions being asked at the Q and A session the Council officers have been unable to provide examples of current problems eg with litter or people who have had access impeded or noise from dining areas that justifies the Council having to act now and in such far reaching manner. We urge the Councillors to ask what the problems are that necessitate the policy and why the measures are not being imposed in other Council controlled outdoor spaces?

10 This submission covers:

10.1 An introduction to the THG and its importance to the Central City;

10.2 The THG's concerns about the Policy Review; and

10.3 Conclusions.

11 The THG wishes to be heard in support of the submission and notes that a number of individual hospitality operators wish to speak at the hearing. The THG will be supported by legal counsel and a noise expert. The THG expects proper time to be set aside for the hearing on the introduction of rules that are unjustified in modern society.

THE THG AND ITS IMPORTANCE TO THE CENTRAL CITY

12 The Terrace is a hub for hospitality and commercial businesses within the Terrace Precinct in the heart of Christchurch. The THG is a group of hospitality businesses operating along the Terrace. The THG provide a vibrant dining and entertainment experience within the Central City.

13 Prior to the 2010 and 2011 Canterbury Earthquakes people flocked to venues on 'The Strip', a row of cafes, restaurants and bars located next to the Avon River between Hereford Street and Cashel Street. After the Strip was demolished following the earthquakes the Strip, the lack of any hospitality hub left a void in Christchurch's inner city.

14 In 2017 the first hospitality establishment opened on the Terrace, a collection of venues situated where the Strip previously stood. The opening of the Terrace represented a significant investment in the future of Christchurch by THG. In investing in the Terrace, members of THG recognised the essentiality of an inner-city entertainment and hospitality sector to the City's earthquake recovery. THG endeavoured to bring tourists back to Christchurch (particularly cruise visitors and visitors to Te Pae and the future multi sports arena), and to create a vibrant city that appealed to the youth of New Zealand for future living.

15 Comprised of over 30 establishments, the Terrace is the beating heart of Christchurch's inner city hospitality scene. Throughout the year the Terrace is a bustling and dynamic place that tourists and locals alike visit. In the spring and summer months people are drawn to the Terrace during the day to sit outside in the sun whilst enjoying local Ōtautahi dining, drinks and live music. The live music is often emerging young artists or duos showing the Christchurch community their skills in flute, violin, singing or guitar or keyboards. This would be prohibited under the Policy.

16 The Terrace contributes significantly to helping the Council achieve its goal of Christchurch's central city being the thriving economic heart of an international city,

and a vibrant, people focused place day and night.¹ Outdoor dining and appropriate levels of background music in Christchurch's largest hospitality precinct is integral to achieving Outcome 4, being to grow the range of evening and night-time activities in the central city. The Council recognises this to be an important factor in helping to attract residents in, particularly the young people who are the "lifeblood of our city's economy."² Outdoor dining and music on the Terrace support the Council's ambition under Outcome 4, to ensure "Consistent increases in ... evening activity and active street fronts."³ Restricting the Terrace's ability to provide enticing outdoor dining ambience would have a significant detrimental effect upon the Council's ability to achieve these goals.

- 17 Hospitality in Christchurch plays an essential role in the city's economy, both directly and due to its connection to New Zealand's largest export industry, tourism. The recent return of cruise ship passengers and the opening of the Te Pae convention centre has provided a much-needed boost to tourism in the city. Being located in close vicinity to both the cruise ship drop-off points and Te Pae, the lively atmosphere of the Terrace is integral to establishing Christchurch as a travel destination instead of a gateway to other South Island locations.
- 18 Visitors to Christchurch who are not familiar with the venues will often make snap decisions to dine on a perception of busyness being an indicator of good food and service. Every hospitality operator knows that the way to attract patrons is by having a busy outdoor area regardless of the number of patrons indoors (which often can't be seen easily).
- 19 Directly, the hospitality sector contributes \$6.8b in GDP annually to the New Zealand economy.⁴ As such, fostering the success of hospitality venues in the inner city should be an important priority for the Council. The Policy discourages patrons from outdoor dining.
- 20 Outdoor dining is an important part of the experience offered by the THG. It provides a sheltered and inviting space for outside dining or after work drinks, with outdoor heaters for cooler days and nights. Background music similar to what is played inside is an important part of a dining experience and ambience. Live music particularly during summer weekend days is a key attractor for visitors to the City and to particular establishments.

CONCERNS ABOUT THE POLICY REVIEW

- 21 The THG seeks that the drafting proposed in the Policy Review encourages and enables outdoor dining and recognises the significant role which this type of dining plays in the local economy. There is a clear need to achieve the right policy settings and remove inappropriate policy and conditions to enable the local economy to grow and protect consumer choice.

¹ Christchurch City Council "Central City progress" < <https://ccc.govt.nz/culture-and-community/central-city-christchurch/our-progress/> >.

² Christchurch City Council "Central City progress" < <https://ccc.govt.nz/culture-and-community/central-city-christchurch/our-progress/> >.

³ Christchurch City Council "Central City progress" < <https://ccc.govt.nz/culture-and-community/central-city-christchurch/our-progress/> >.

⁴ Brad Olsen, Andrew Beattie and Dirk Van Seventer *Economic impact of the New Zealand hospitality sector: for Hospitality New Zealand* (Infometrics, November 2021) at 41.

- 22 Outdoor dining enhances the economic, social and cultural wellbeing of the district. It helps build vibrant and exciting dining experiences and in turn robust economies by increased visitation and spending by tourists, visitors and locals. Outdoor dining experiences provided by THG continues to support the growth of the local economy, providing more choice of dining experience.
- 23 The THG supports the concept of a single user-friendly outdoor dining policy as well as a simplified application process. However, the Policy Review as drafted proposes an unjustifiably burdensome regime. It will not achieve the purpose of the Resource Management Act 1991 nor the National Built and Environments Act 2023, nor is it necessary to give effect to the Canterbury Regional Policy Statement, nor any objectives and policies in the Christchurch District Plan, nor Council Policies.
- 24 The THG's primary concerns with the Policy Review relate to:
- 24.1 the imposition of smokefree and vapefree requirements;
 - 24.2 the prohibition of live entertainment and speakers or amplifiers;
 - 24.3 the interference in the layout and design of furniture, canopies, screens and signage within the licence area which conflicts with Council policy for active street fronts and to encourage visitors;
 - 24.4 the proposed approach to review existing licences; and
 - 24.5 the requirement for public liability insurance of not less than \$2 million.
- 25 These concerns are expanded on below.

Imposition of smokefree and vapefree requirements

- 26 Policy 6.6.3 of the Draft Policy requires licensees to display smokefree and vapefree signage and to remove ashtrays or other receptacles for smoking or vaping litter. This is reinforced through draft Standard Condition 21 which states:

All outdoor dining areas are required to be smoke and vape-free and to display smoke-free and vape-free signage. No ashtrays or other receptacles for smoking or vaping related litter are permitted within an outdoor dining area.

- 27 Policy 6.6.3 and Standard Condition 21 seek to impose a standard that is not imposed on hospitality operators on private land operating outdoor dining areas. The imposition of smokefree and vapefree requirements for outdoor dining is also inconsistent with the Smokefree Environments and Regulated Products Act 1990 (the *Act*) which only requires *internal* areas of workplaces, licenced premises and certain public enclosed areas to be smokefree and vapefree. Under the *Act*, smoking and vaping is legally permitted in open areas.
- 28 The imposition of smokefree and vapefree requirements for outdoor dining will have an immediate and chilling effect on the THG's businesses. This is being introduced through a rushed consultation process and is not supported by any scientific research. The proposed policy and condition for licences is contrary to, or is inconsistent with (in particular) the purposes of the empowering legislation, the *Act*, nor the Smokefree Aotearoa 2025 Action Plan. The *Act* and Action Plan do not seek to remove the rights the public have smoke and vape in open areas.
- 29 The THG also consider the imposition of smokefree and vapefree requirements and conditions to be inconsistent with the Council's own Smokefree and Vapefree Public

Places Policy (*Smokefree and Vapefree Policy*). The Smokefree and Vapefree Policy states that (relevantly):

Purpose

[...]

The Council seeks to achieve its objectives in a way that would not unduly infringe the ability of others to smoke or vape in outdoor public places should they want to. The policy is promoted as voluntary and non-regulatory where people can choose to comply in the spirit of promoting healthy lifestyle choices. This educative policy discourages smoking or vaping in public outdoor places where people particularly children and young people gather.

Policy detail

[...]

The policy is not a ban on smoking or vaping in a public place, but is more about encouraging compliance in the spirit of promoting healthy lifestyle choices.

Enforcement

This policy is educative, self-policing and no fines will be used against those who breach the policy. Compliance with the policy is entirely voluntary and it would not be enforced by Council staff.

- 30 Proposed Policy 6.6.3 and Standard Condition 21 go well beyond the Smokefree and Vapefree Policy. They unduly infringe on the choice of people to smoke or vape in outdoor public places should they want to. The policy and condition are not voluntary and, if patrons do not comply with the condition, and/or licensees do not enforce the rules and remove patrons who are smoking or vaping they could lose their licence. It essentially introduces a ban on smoking and vaping in a public place that is unjustified in a modern society.
- 31 The policy is impractical as people are simply going to take a few steps outside the licensed area to smoke or vape in another Council owned public space eg the pavement and will then step back in. THG asks the Council to explain why it's Policy falls unevenly on outdoor dining operators and patrons of if it is moving to ban smoking and vaping in all outdoor public places. Why is the Council not banning vaping and smoking in all public spaces that it controls eg the pavements, parks and beaches?
- 32 The THG is also concerned that consumers may choose to go to pubs and restaurants that allow outdoor smoking and vaping rather than their premises on the Terrace. This does not encourage or enable outdoor dining and the vibrancy it brings to the public places of Christchurch particularly the CBD and provides businesses that solely operate on private land a competitive advantage.
- 33 Further, the THG consider it unwise to remove ashtrays and other receptacles for smoking or vaping related litter. The THG consider this will simply create increased waste management issues by leading to increased littering.
- 34 The THG seeks that Policy 6.6.3 and Condition 21 be removed.

Layout, Design of Furniture, Canopies, Screens and Signage

- 35 The proposed rules on furniture design, layout, canopies and signage are unjustified and demonstrate a complete lack of understanding as to how hospitality operators operate to attract customers and keep areas safely accessible for patrons (including those in wheelchairs) and staff safe when serving and moving amongst tables and indoor areas.

- 36 As an example the condition requiring outdoor furniture to be moved inside at night (which in the case of venues that close at 3am is only for a few hours before breakfast dining starts) poses a health and safety risk to staff as most of the furniture is simply too heavy to be moved safely without properly trained removal contractors and/or is chained to other immovable objects to prevent it being stolen.
- 37 It is unclear why Council is getting itself involved in design issues eg design of furniture and canopies when it has no such control over private outdoor spaces. The Terrace operators have all had architects and exterior designers and landscape architects involved in the designs of their buildings and outdoor areas are not aware of the Council having any expertise in matters such as furniture design, or exterior design of buildings.
- 38 Particularly problematic are all requirements for all furniture items to be "complementary in design and appearance" and using "a simple range of materials and a consistent colour palette" and for furniture to be "approved" by Council. Some outlets have as a feature mismatching chairs, and tables and umbrellas as part of their hospitality theme or design furniture to be too heavy to move so it can't be stolen.
- 39 Similarly the requirement for canopies to have a "single colour" is difficult to understand. A number of outlets have bespoke canopies designed and installed at some expense of more than one colour to distinguish their outlet from others and these would have to be removed under the policy. Under the proposed conditions a restaurant with an Italian theme could not have a red, green and white canopy or a restaurant with a New Zealand theme could not have a black and white canopy or one with a silver fern against a black background. A variety of colours to signal different dining options is a hallmark of the Terrace to attract visitors to the variety on offer and to activate the street frontage.
- 40 The conditions on signage are particularly restrictive and considerably exceed the requirements of the District Plan. The rules would prevent signage in the dining area other than "integrated within screens and planters". A freestanding sandwich board displaying the menu but including the logo would be prohibited within the licence area.
- 41 The requirement that every table be accessible by a wheelchair is impractical and beyond the requirements of other legislation. For example sometimes tables have a row of bench seats and high leaners.

Prohibition of live entertainment and speakers or amplifiers

- 42 Standard Condition 24 introduces a prohibition of live entertainment and speakers or amplifiers in or on the licensed area. It states that:

The area covered by this licence may not be used for live entertainment and speakers or amplifiers may not be placed or used in or on the area. The licensee shall comply with noise levels in the District Plan and with the obligation under section 16 of the Resource Management Act 1991 to ensure that the emission of noise does not exceed reasonable levels.

- 43 The Outdoor Dining Policy and associated licences do not need to attempt to replicate nor override the noise standards and rules that already apply through the District Plan. The rules and standards set in the District Plan are evidence-based, followed extensive community consultation and a hearing process are already operating effectively to manage amenity and character. If there are issues then the

proper democratic process is for the Council to vary its District Plan rather than introducing back door policy.

- 44 The THG has no issue with compliance with the noise levels in the District Plan and with section 16 of the RMA.
- 45 The prohibition on speakers is particularly draconian as most outdoor areas will have speakers playing the same music as is played inside the venue. This is a key part of any hospitality offering to create an ambience where patrons feel part of the venue they are in (the music can often be themed to suit the type of food offering) and is set at a level where diners can comfortably hold a conversation with others at their table, but privacy is afforded to the group at the table next door as their conversation is buffered by the background music.
- 46 This is particularly so for out-door areas where the operator wants to still make sure the diner feels part of the venue that are in but are also buffered from the additional noise from the outside such as street and vehicle noise.
- 47 The prohibition on live entertainment is unreasonable and unjustified and very concerning. Live entertainment is a key part of Christchurch's social fabric and provides a welcoming, enjoying and authentic experiences for customers and draws them into venues. The operators on the Terraces particularly in summer support and sponsor a huge variety of artists often young and emerging playing their flute, violin, guitar small singing duos (up to barber shop quartets) sing from our balconies. To remove this vibrant flavour would be a significant barrier to attracting people into the City venues especially during summer when the reason people come to town is to dine and to listen to our emerging talent.
- 48 The THG seeks that Standard Condition 24 be amended as follows:

~~The area covered by this licence may not be used for live entertainment and speakers or amplifiers may not be placed or used in or on the area.~~ The licensee shall comply with noise levels in the District Plan and with the obligation under section 16 of the Resource Management Act 1991 to ensure that the emission of noise does not exceed reasonable levels.

Introduction of a three-year term for an outdoor dining licence

- 49 Policy 6.6.4 introduces a defined term for licences (of up to three years) rather than the current open-ended term.
- 50 This policy imposes increased costs to hospitality businesses and leads to investment uncertainty. In THG's view, the policy introduces unduly regulatory and administrative burden. THG considers the policy unnecessary and seeks that licences to be open-ended and to simply work in conjunction with Policy 8.4 which enables the Council to take steps to address compliance issues.
- 51 Therefore, the THG seeks that Policy 6.6.4 be removed.

Review of existing outdoor dining licences

- 52 Policy 6.7 provides that the policy supersedes any approval previously given by the Council and that holders of an existing outdoor dining licence must apply for a new approval in accordance with this policy.
- 53 An explanatory note advises that the Council proposes to review each of the existing outdoor dining licences and to work with licensees to replace current licences with new licences which comply with this policy. This is likely to be a progressive process,

for example to replace current licences without an expiry date with fixed term licences (generally a three year term). This has a material and retrospective impact on existing licence holders considerably undermining investment certainty.

Requirement for public liability insurance of not less than \$2 million

- 54 Standard Condition 26 proposes to introduce a requirement for licence holders to hold public liability insurance of not less than NZ \$2million that is “in all respects satisfactory to the Council”. Many hospitality operators will not hold this level of insurance.
- 55 The policy seeks to address Key Objectives which are generally environmental effects. Insurance is not an environment matter and is not imposed on resource consents. It is not clear what the purpose of the requirement for public liability insurance is and nor is it clear what the insurance cover is intended to achieve or how the amount has been set. This Condition does not appear to be well-reasoned nor proportionate to the provision of outdoor dining licences. The policy is unreasonable and therefore ultra vires the Council’s powers.
- 56 The THG seeks that Standard Condition 26 be removed and/or the Council provide well-reasoned justification for this condition linked to the Key Objectives.

Costs

As a final comment the THG ask what the Council’s costs of this additional regulation and compliance are and whether it will be covered by increasing rates.

The THG seek assurance that the retrospective removal of rights that they currently enjoy to operate within their licences without unreasonable interference by Council on how they conduct their businesses within the licence area will be compensated for by reductions in the amount of license fees charged.

Submissions received on the Outdoor Dining Policy, August 2023

Victoria Neighbourhood Association - Submission on Outdoor Dining Policy							
ID	Name- Organisation	Do you support the draft policy?	Parts of the policy you support	Parts of the policy you oppose	Feedback on the draft Outdoor Dining Guidelines and Standard Conditions	Should the policy do more to accommodate small businesses?	Provide your feedback here
6875	Marjorie Manthei, Membership Coordinator, Victoria Neighbourhood Association	Yes	The Victoria Neighbourhood Association Committee discussed the policy at its meeting on 14 August 2023. It was agreed that the policy is sensible and addresses problems our members previously experienced (eg. obstruction of footpaths, smoking, litter). We support the provisions re accessibility for pedestrians and users of mobility devices, smoke- and vape-free, licensee responsible for managing waste/litter and specified term (with 3-year maximum). We did not identify anything that we oppose.		Everything seems to be covered and is written very clearly.	No	We have not identified anything that would disadvantage small businesses, unless the fee associated with the license is higher than reasonable. Perhaps there could be a differential fee, based on size of the business?

Zodiac / Chiwahwah - Submission on Outdoor Dining Policy							
ID	Name- Organisation	Do you support the draft policy?	Parts of the policy you support	Parts of the policy you oppose	Feedback on the draft Outdoor Dining Guidelines and Standard Conditions	Should the policy do more to accommodate small businesses?	Provide your feedback here
7052	Angela Cameron Zodiac / Chiwahwah	No		Licensees to display smokefree and vape free signage and to remove ashtrays or other receptacles for smoking or vaping litter. ** This will push patrons out into an unmonitored area congregating in a mass where there will be fights and disruption to the outside area of venues. Who will monitor these groups? Who is responsible for that. A licensed venue should be able to choose where they can have a smoking and or vaping area. Guests will have to leave the venues and drinks to go out and vape /smoke - and then try to come back into a venue. Where do they leave their drinks? Will they be spiked if they are left unattended?		Yes	

Submissions received on the Outdoor Dining Policy, August 2023

ID	Name-Organisation	Do you support the draft policy?	Parts of the policy you support	Parts of the policy you oppose	Feedback on the draft Outdoor Dining Guidelines and Standard Conditions	Should the policy do more to accommodate small businesses?	Provide your feedback here
7050 (to be read with submission 7052)	Amanda Storey, General Manager, Chiwahwah/Zodiac	No		<p>Smoking and vape free, this will cause an issue with people taking drinks into unlicensed premise and onto the terrace and will create more congestion for pedestrians in this area.</p> <p>The review following a 3 year term, I would assume the cost to CCC's time to review will be on charged to the business.</p> <p>Use of a single colour for canopies to minimise visual clutter and compliment building facade. This seems like an unnecessary control from CCC when the canopy can really shape the theme and look of the restaurant/bar.</p>		Yes	