

**BEFORE INDEPENDENT HEARING COMMISSIONERS  
IN CHRISTCHURCH**

**TE MAHERE Ā-ROHE I TŪTOHUA MŌ TE TĀONE O ŌTAUTAHI**

**IN THE MATTER** of the Resource Management Act 1991

**AND**

**IN THE MATTER** of the hearing of submissions on Plan Change 14 (Housing and Business Choice) to the Christchurch District Plan

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**SUPPLEMENTARY STATEMENT OF EVIDENCE OF GLENDA MARGARET  
DIXON ON BEHALF OF CHRISTCHURCH CITY COUNCIL**

Dated: 14 December 2023

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## EXECUTIVE SUMMARY

1. My full name is Glenda Margaret Dixon. I am employed as a Senior Policy Planner in the City Planning Team, in the Infrastructure, Planning and Regulatory Services Group of the Christchurch City Council (the **Council**).
2. I have prepared this supplementary statement of evidence in response to the Panel's questions at the PC14 hearing in relation to the Council's consultation with and notice given, in the context of Plan Change 14 (**PC14**), to landowners whose properties are within the proposed Residential Heritage Areas (**RHAs**) and Residential Character Areas (**RCAs**).
3. Prior to notification of both Plan Change 13 (**PC13**) and PC14, the Council undertook targeted engagement with the owners of properties in both the RHAs and RCAs. In notifying the plan change, more general engagement with the wider public included raising awareness of the proposed changes concerning RCAs and RHAs.
4. Pre-notification engagement and consultation most notably included the Council sending pre-notification letters to all landowners in both the RHAs and RCAs. These letters explained the proposed changes including their impacts, provided guidance on where further information on the proposed changes could be obtained and explained how landowners could provide feedback. Engagement was also undertaken via the Council's 'Have Your Say' webpage, the District Plan webpages for PC14 and PC13, and several online information webinars and community meetings. Various mechanisms were made available for landowners and the public to provide feedback on the draft proposed changes.
5. In notifying the plan change, a public notice of the proposed plan changes<sup>1</sup> was published both online and in the newspaper with the sending of a 'flyer' to all affected landowners. The Council webpages, including 'Have Your Say' webpage, were updated for notification to include new links to a submission form and a full consultation document. Again, various

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<sup>1</sup> <https://www.ccc.govt.nz/assets/Documents/The-Council/Plans-Strategies-Policies-Bylaws/Plans/district-plan/Proposed-changes/2023/PC14/PC14-Public-Notice.pdf>

mechanisms were made available for landowners and the public to make submissions on the proposed changes.

6. In my opinion, engagement and consultation for PC14 including on the RCAs and RHAs was thorough and robust, in keeping with the scale of the potential changes, and affording ample opportunity for those who wanted to participate in the process to do so. As such the engagement and consultation accords with Council's best practice.

## **INTRODUCTION**

7. My full name is Glenda Margaret Dixon. I am employed as a Senior Policy Planner in the City Planning Team, in the Infrastructure, Planning and Regulatory Services Group of the Council.
8. I prepared a section 42A report, dated 11 August 2023, on behalf of the Council in respect of PC14 to the Christchurch District Plan (the **District Plan**). My section 42A report addressed RHAs. I also prepared rebuttal evidence on this topic.
9. Ms Liz White prepared a section 42A report, dated 11 August 2023, on behalf of the Council in respect of PC14 in relation to RCAs. Ms White also prepared rebuttal evidence on this topic.
10. I have prepared this supplementary statement of evidence in response to the Panel's questions at the PC14 hearing in relation to the Council's consultation with and notice given, in the context of PC14, to landowners whose properties are within the proposed RHAs and RCAs.
11. I am authorised to provide this evidence on behalf of the Council.
12. My qualifications and experience are set out at paragraphs 2.1.2 to 2.1.4 of my section 42A report.

## **Code of conduct**

13. While this is a Council hearing, I have read the Code of Conduct for Expert Witnesses (contained in the 2023 Practice Note) and agree to comply with it. Except where I state I rely on the evidence of another person, I confirm that the issues addressed in this statement of evidence are within my area of expertise and I have not omitted to consider material facts known to me that might alter or detract from my expressed opinions.

## ENGAGEMENT ON DRAFT PLAN CHANGE

14. Prior to notification of both PC14 and PC13, the Council undertook both targeted engagement with landowners who would be affected by proposed changes relating to both the RHAs and RCAs, as well as more general engagement with the wider public to raise awareness of the proposed changes concerning RCAs and RHAs.
15. Consultation was open from 11 April 2022 until 13 May 2022.

### Pre-notification

16. Pre-notification letters to all owners of properties in both RHAs and RCAs were sent in April 2022. Redacted mailing lists are attached as **Appendix A:**
  - (a) Letter 1: To owners of properties being removed from RCAs (reduced boundaries, or character area being removed). This letter was sent to Lists 1 and 2 of the mailing lists.
  - (b) Letter 2: To owners of properties staying in RCAs. This letter was sent to List 3 of the mailing lists.
  - (c) Letter 3: To owners of properties in both RCAs and RHAs. This letter was sent to List 4 of the mailing lists.
  - (d) Letter 4: To owners of properties removed from RCAs but now proposed to be in RHAs instead. This letter was sent to List 5 of the mailing lists.
  - (e) Letter 5: To owners of properties proposed to be in RHAs only. This letter was sent to List 7 of the mailing lists. This mailing list was generated by taking List 6, all properties in RHAs and removing those owners also in List 4 (properties in both RCAs and RHAs).
17. I note that Submitter #2015 – Susan Mary Wall was sent Letter 3 and that her property, 24 Carrington Street, appears on List 4 of the mailing list at line 167.
18. Each of the letters:
  - (a) explained the driver for the proposed changes (the National Policy Statement on Urban Development 2020 and the Resource

Management (Enabling Housing Supply and Other Matters) Amendment Act 2021);

- (b) explained the reasons for including or excluding properties in RCAs and for including properties in RHAs;
- (c) provided a summary of the impact of a property being included or excluded from a RCA or included in a RHA;
- (d) provided guidance on where further information on the proposed changes could be obtained (discussed further below);
- (e) explained how landowners could provide feedback (discussed further below); and
- (f) offered Council attendance in the event a community meeting was held and landowners wanted Council to attend.

#### **Further information**

19. The letters explained that further information on the draft plan change could be obtained from:

- (a) Council's 'Have Your Say' webpage, and the District Plan webpages for PC14 and PC13. These webpages included a description of the contents of these plan changes, and draft provisions including mapping;<sup>2</sup>
- (b) hard copies of the webpage summary information on PC14 and PC13 which could be obtained at the Council's service centres;
- (c) the online information webinars which were held to allow the public to hear more about the proposed changes on 27 April 2022<sup>3</sup> (RHAs and RCAs) and 2 May 2022 Residential Intensification), which residents could register to take part in. The webinars were recorded and made available online, as well as the questions asked and answers provided.
- (d) a phone service and email account, [planchange@ccc.govt.nz](mailto:planchange@ccc.govt.nz) which provided the ability for the public to ask questions and find out how

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<sup>2</sup> <https://www.ccc.govt.nz/the-council/community-consultation-archive/show/531> <https://www.ccc.govt.nz/the-council/community-consultation-archive/show/532>

<sup>3</sup> The date of 28 April 2022 included on some of the letters was incorrect, but most residents asking about this said they had taken guidance from the fact that the word Wednesday was also used, so had (correctly) assumed that the webinar was being held on April 27 2022.

the changes affected them. There were a large number of phone and email responses to a number of queries from individuals following receipt of the pre-consultation letters.

- (e) community meetings were held on request for example, in Chester St East and St Albans areas. Public meetings were however limited as a result of Council policy at the time following the Covid 19 pandemic.
20. A consultation leaflet / booklet describing the changes on PC13 and PC 14 in plain English was also provided on the PC14 and PC13 webpages, with the closing date for feedback of 13 May 2022 on the cover.
21. Several further webinars were subsequently held prior to notification, with both lunchtime and evening options, for example, on 14 December 2022 (Housing and Business Choice PC14), and 16 February 2023 (PC14 Housing and Business Choice Update).

### **Opportunities to provide feedback**

22. The letters described in paragraph 16 clearly set out a number of ways in which landowners could provide feedback on the draft plan change during the consultation period. Feedback could be provided by:
- (a) completing an online form on Council's 'Have Your Say' (consultation) webpage between 11 April 2022 and 13 May 2022;
  - (b) writing via email to [planchange@ccc.govt.nz](mailto:planchange@ccc.govt.nz); and
  - (c) writing via post (freepost) or delivery to Council's offices, service centres or libraries.

### **Results**

23. The results of the pre-notification consultation were summarised in reports including the following:
- (a) <https://ccc.govt.nz/assets/Documents/Consultation/2022/07-July/Plan-Change-14-Early-Feedback-Report.pdf>; and
  - (b) the Synthesis Report which specifically analyses the comments on RHAs and heritage sites in particular, and also RCAs to some extent (attached as **Appendix C**). This is titled PC13, since at that time PC13 and PC14 were being considered separately, but the report

touches on RCAs under PC14 as well, because the two topics of RHAs and RCAs were intertwined in some of the feedback.

## **PUBLIC NOTIFICATION**

24. Public notification of PC13 and PC14 was aimed at both specific landowners affected by the proposed changes as well as the general public. Notification involved:

- (a) public notice of the proposed plan change<sup>4</sup> which included a considerable amount of detail on the topics covered by PC14 and PC13. It was published in the Press and the Star (community newspaper), with a short article on Council's webpage Newswire;
- (b) a 'flyer' was sent to every affected landowner at the time of notification, which included the Public Notice. This was posted to absentee owners as well as those resident in Christchurch (attached as **Appendix D**);
- (c) the Council webpages, including 'Have Your Say' webpage (used for all consultations) and for the two plan changes were updated, including new links provided to a submission form, updated provisions and supporting documents, and a link to interactive maps with a searchable function to search for individual properties, with pop-up boxes for more information;
- (d) a full consultation document was provided on the webpages and at Council libraries, with a closing date of 3 May 2023 on the cover. It included a submission form at the back<sup>5</sup>; and
- (e) Further meetings with various groups on request, albeit on general matters rather than being specific to RHAs or RCAs, were held post notification, for example:
  - (i) 11 April 2023 – Architectural Designers NZ
  - (ii) 18 April 2023 – Institute of Architects.
  - (iii) 27 April 2023 – Beckenham Community Board

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<sup>4</sup> <https://www.ccc.govt.nz/assets/Documents/The-Council/Plans-Strategies-Policies-Bylaws/Plans/district-plan/Proposed-changes/2023/PC14/PC14-Public-Notice.pdf>

<sup>5</sup> <https://www.ccc.govt.nz/assets/Documents/Consultation/2023/03-March/WEB-STR5432-Housing-and-Business-Choice-and-Heritage-Consultation-document-1.pdf>



- (iv) 2 May 2023 – Lincoln University
  - (v) 11 September 2023 – Combined residents groups from Riccarton, Hornby and Papanui (post further submission period).
25. Submitters could provide a submission by:
- (a) completing a submission form online via Have Your Say.
  - (b) completing the form at the back of the full consultation document and its return by freepost or email.
  - (c) emailing submissions directly to the plan change team at [planchange@ccc.govt.nz](mailto:planchange@ccc.govt.nz); and
  - (d) posting submissions to the Council (freepost).
26. The submission period opened on 17 March 2023 and closed on 12 May 2023 providing a couple of months for submitters to inform the Council of their view. Further submissions were sought on 30 June 2023 closing on 17 July 2023.<sup>6</sup>

## CONCLUSION

27. In my opinion the engagement and consultation undertaken by the Council in relation to the proposed changes to RCAs and introduction of RHAs accords with Council's best practice.
28. Council's engagement and consultation processes have developed considerably in recent years and cover multiple platforms including addressed mailouts, email and phone query lines, newspapers, Facebook (e.g., via Newslines), Council's own webpages, and residents' group meetings. Questions via webinars are now often possible, and these were undertaken for PC14 and PC13. Consultation at pre-notification stages of plan changes is considerably more in depth than it was in the past.
29. In my opinion, engagement and consultation for PC14 was thorough and robust, in keeping with the scale of the potential changes, and affording

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<sup>6</sup> The Council notified an addendum with additional and amended points on 24 July, with further submissions on those points closing on 7 August 2023. A second addendum with a small number of additional and amended points was notified on 23 August, with further submissions on these points closing on 6 September 2023.

ample opportunity for those who wanted to participate in the process to do so.

**Glenda Dixon**

14 December 2023