

**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

**STATEMENT OF PRIMARY EVIDENCE OF WENDY ROSALIE HODDINOTT
ON BEHALF OF CHRISTCHURCH CITY COUNCIL**

HERITAGE LANDSCAPE

QUALIFYING MATTER: RICCARTON BUSH

Dated: 11 August 2023

TABLE OF CONTENTS

EXECUTIVE SUMMARY	1
INTRODUCTION	3
QUALIFICATIONS AND EXPERIENCE	4
CODE OF CONDUCT	4
SCOPE OF EVIDENCE	4
SUMMARY OF FINDINGS FROM PŪTARINGAMOTU RICCARTON BUSH HERITAGE LANDSCAPE REVIEW - DECEMBER 2022	5
SUMMARY OF FINDINGS FROM PŪTARINGAMOTU RICCARTON BUSH HERITAGE LANDSCAPE REVIEW ADDENDUM - APRIL 2023.....	6
RESPONSE TO MATTERS RAISED IN THE RELEVANT SUBMISSIONS OPPOSING THE MORE ENABLING APPROACH PROPOSED BY THE MDRS ...	7
RESPONSE TO MATTERS RAISED IN THE RELEVANT SUBMISSIONS SUPPORTING THE MORE ENABLING APPROACH PROPOSED BY THE MDRS	11
CONCLUSION.....	15
APPENDIX A: ORIGINAL RECOMMENDED MODIFICATIONS AND ADDITIONS TO INTERFACE AREA - PROPOSED PROTECTION AND SETBACKS FOR PŪTARINGAMOTU RICCARTON BUSH, DECEMBER 2022	
APPENDIX B – HERITAGE LANDSCAPE REVIEW – ADDENDUM FOR PŪTARINGAMOTU RICCARTON BUSH, APRIL 2023	
APPENDIX C – STATEMENT OF MANAWHENUA VALUES: PŪTARIKAMOTU, MAHAANUI KURATAIAO LTD, DECEMBER 2022	
APPENDIX D – RECOMMENDED MODIFICATIONS AND ADDITIONS TO INTERFACE AREA - PROPOSED PROTECTION AND SETBACKS FOR PŪTARINGAMOTU RICCARTON BUSH, JUNE 2023	

EXECUTIVE SUMMARY

1. My full name is **Wendy Rosalie Hoddinott**. I am employed as a Technical Principal, Heritage Landscape Architect at WSP New Zealand and have been practicing as a Landscape Architect for 17 years.
2. I have prepared this statement of evidence on behalf of the Christchurch City Council (the **Council**) in respect of my findings from a Heritage Landscape Review I carried out for Pūtaringamotu Riccarton Bush and the matters arising from the relevant submissions on Plan Change 14 (**PC14**) to the Christchurch District Plan (the **District Plan**).
3. The purpose of this evidence is to present my findings from the Heritage Landscape Review (Appendix 43 to Part 2 of the Section 32 Report for PC14). This document was used by the Council to assist with preparing the extent of the Riccarton Bush Interface Area as a Qualifying Matter and the planning controls needed to ensure that Pākeha European heritage and landscape values of Pūtaringamotu are retained through PC14. The views expressed by mana whenua with respect to Riccarton Bush clearly align with my conclusions. The Review was endorsed by Mahaanui Kurataiao Ltd, representing mana whenua Ngāi Tūāhuriri, as appropriately protecting the mauri of Pūtaringamotu.
4. I also prepared a subsequent Addendum for Pūtaringamotu Riccarton Bush, the findings of which are also presented in this evidence. I also address the submissions relevant to the findings from both these reports.
5. My Heritage Landscape Review identified Pūtaringamotu as a sensitive heritage site and setting with high landscape, heritage and ecological values. The report noted that the contextual, landmark and historic values of Riccarton Bush would be adversely affected by the increased building heights initially proposed. Views to Riccarton Bush can be observed along the driveways and outdoor areas of adjacent residential properties, which foregrounded by residential tree canopies are part of the setting and contribute to the experience of Riccarton Bush while walking adjacent streets.
6. In my Heritage Landscape Review, I concluded that properties shown in the Council's original interface plan, along with additional sites that would obscure views of Pūtaringamotu, should be exempt from rules enabling

intensification. I suggested that these properties should remain at their current Residential Suburban (up to 2 storeys), Residential Medium Density and Special Purpose (School) Zoning as identified in the CDP. I recommended that the outcomes captured in Beca's 2015 Character Area 7 Report be applied to those properties closest to Riccarton Bush, noting that the defining elements of the character report achieve the same visual outcomes necessary to protect the heritage setting that interfaces Riccarton Bush. For properties adjacent to the proposed interface sites, I recommended transitional heights, that is, restrictions to 3 storeys on properties that lie adjacent to the outer edge. A Special Purpose (School) Zone and selected Medium Residential Zones are retained within the Interface Area, with additional sites added to the Council's proposed interface as per **Appendix A**.

7. In the Addendum to the Heritage Landscape Review, I recommended that additional controls be added to further protect Riccarton Bush, due to the impacts of the MDRS. These included controls addressing site density, setbacks of buildings, subdivision controls and height controls over St Teresa's School.
8. Since preparing the Heritage Landscape Review and Addendum, I have considered the relevant submissions received in relation to PC14 and have responded to them in my evidence.
9. Overall, having regard to the matters raised in submissions, I support the additional controls identified within the Council's submission that address site density, the setbacks of buildings, subdivision controls and height control over St Theresa's School. I also support adding properties 34, 36 and 36A Kahu Road, adjacent to the Ōtākaro Avon River to the Riccarton Bush Interface Area.
10. Thirteen submissions were received requesting a more enabling approach to the Riccarton Bush Interface Area. These covered a range of requests that included extending the High Density Residential Zone in Riccarton closer to Riccarton Bush with additional height overlays to 50m; removing the Interface Area and all associated provisions completely, restricting the Interface Area to sites north of Riccarton Bush, no further restrictions placed on properties in the Interface Area than those currently proposed by PC14 and reducing the area of Riccarton Bush Interface back to the Council's original 40 sites. My

concluding recommendations are that the Qualifying Matter is retained, with some minor changes made to the extent.

INTRODUCTION

11. My name is **Wendy Rosalie Hoddinott**. I am employed as a Technical Principal, Heritage Landscape Architect at WSP New Zealand and have been practicing as a Landscape Architect for 17 years.
12. In December 2022, I provided a report to the Council reviewing its planning approach to the properties surrounding Pūtaringamotu Riccarton Bush, relative to central government's National Policy Statement on Urban Development 2020 (**NPS-UD**) and the Resource Management (Enabling Housing Supply) Amendment Act 2021 (**RMA Amendment Act**). This report was in response to the Council identifying properties surrounding Pūtaringamotu that may be subject to Qualifying Matters relating to the heritage and open space values of Pūtaringamotu.
13. I provided an Addendum to this report to the Council dated 26th April 2023. The Addendum provided additional recommendations to address errors and omissions in the Heritage Landscape Review and to better articulate the conclusions in the original report. A copy of this Addendum is set out in **Appendix B** to this statement of evidence.
14. In preparing this evidence I have reviewed:
 - (a) existing heritage reports;
 - (b) the Christchurch District Plan;
 - (c) Heritage New Zealand Pouhere Taonga's online List Entry;
 - (d) the Christchurch Suburban Character Area Assessment prepared for the Council, Character Area 7: Totara/Hinau/Puriri Assessment by Beca in 2015;
 - (e) relevant community submissions and feedback; and
 - (f) submissions made with respect to Proposed Plan Change 14.
15. I have also visited Riccarton Bush and Setting multiple times and taken photographs.
16. I am authorised to provide this evidence on behalf of the Council.

QUALIFICATIONS AND EXPERIENCE

17. I hold the qualifications of a Bachelor of Social Science (from Lincoln University, Canterbury) completed in 2001, a Master of Landscape Architecture (from Lincoln University, Canterbury) completed in 2006, and a PhD in Landscape Architecture (from Lincoln University, Canterbury) completed in 2018.
18. I am a qualified Landscape Architect, a registered member of the New Zealand Institute of Landscape Architects, and a registered member of the International Council on Monuments and Sites.
19. I have prepared heritage landscape assessments across Canterbury and Banks Peninsula and have provided advice to local and central government on the preservation of landscape and heritage values, predominantly through the preparation of landscape conservation plans.

CODE OF CONDUCT

20. 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.

SCOPE OF EVIDENCE

21. My statement of evidence addresses the following matters:
 - (a) Summary of the findings in Pūtaringamotu Riccarton Bush Heritage Landscape Review from December 2022;
 - (b) Summary of the findings in Pūtaringamotu Riccarton Bush Heritage Landscape Review Addendum from April 2023;
 - (c) Response to matters raised in the relevant submissions opposing the more enabling approach proposed by the MDRS; and
 - (d) Response to matters raised in the relevant submissions supporting the more enabling approach proposed by the MDRS.
22. I address each of these points in my evidence below.

SUMMARY OF FINDINGS FROM PŪTARINGAMOTU RICCARTON BUSH HERITAGE LANDSCAPE REVIEW - DECEMBER 2022

23. In September 2022, I was engaged by the Council to undertake a review of its planning approach to the properties surrounding Pūtaringamotu, relative to the NPS-UD and RMA Amendment Act. The review responded to the Council identifying the surrounding properties as being potentially subject to Qualifying Matters relating to the heritage and open space values of Pūtaringamotu. As a result, the plan change proposes to make development to High and Medium Density Residential Standards (**HDRS** and **MDRS**) less enabling in the area surrounding Riccarton Bush.
24. After reviewing existing heritage reports, relevant statements of significance, community submissions/feedback, the District Plan, Heritage New Zealand Pouhere Taonga's online List Entry, and undertaking multiple site visits, this report found that Pūtaringamotu is an Outstanding Natural Feature and site of national importance with significant heritage, ecological and cultural values. The views of the kahikatea forest canopy above the adjacent houses are considered a distinctive and defining element across the skyline, and what we see today relates to depictions in early paintings of the area.
25. Pūtaringamotu is a very early example in Aotearoa of a natural area that was offered formal protection through the Riccarton Bush Act in 1914 and is significant for its association with many of Canterbury's pioneer settlers and early pastoralists, particularly the Deans families. The bush displays a wide diversity of native flora and fauna and is a defining element and tangible link to the early layout of the Deans property, Deans cottage, Riccarton House and Grounds and the Deans former farm buildings.
26. The Council initially proposed to reduce the NPS-UD intensification heights of buildings from 20m to 12m for the majority of properties directly adjacent to Pūtaringamotu (September 2022 proposal). However, modelling and site visits indicated that the expanse of Riccarton Bush above the rooftops of adjacent houses would still be significantly obstructed with building heights restricted to 12m, creating adverse visual effects not only adjacent to Pūtaringamotu, but also Riccarton Grounds, Riccarton House and the former Deans' farm buildings, weakening their connection with the setting.
27. The Heritage Landscape Review therefore concluded that the adverse effects on Pūtaringamotu and Setting were not mitigated by the Council's then-proposed planning approach (PC14). The proposed height limits had

the potential to reduce the experience of residents, passers-by and some views further afield by obscuring existing sightlines of the Bush. The review recommended that the existing Residential Suburban Zone (up to 2 storeys), Medium Density Residential Zone (up to three storeys) and Specific Purpose (School) Zones (up to two storeys) are retained in this area and additional sites added to the Council's proposed interface (**Appendix A**). The Addendum has since recommended that the same outcome for protecting viewsheds of Riccarton Bush is expected in the Special Purpose School Zone as in the surrounding residential area, i.e., operative height controls of 8m are applied to this area also.

28. The views expressed by mana whenua clearly align with my conclusions. A statement issued by Mahaanui Kurataiao Ltd (**MKT**) in December 2022 identifies the values of local mana whenua Ngāi Tūāhuriri Runanga, noting that, "*Pūtarikamotu is prized as a taonga because of the representative nature of the remnant forest ecosystem*" [...] "*The historical associations and contemporary importance of the bush imbue within it a particular mauri or life force.*" MKT explain that "*the stature of the kahikatea canopy represents a significant cultural landscape within a highly modified urban environment. The visual presence is a significant component of the enduring mauri of Pūtarikamotu.*" MKT conclude by endorsing the Heritage Landscape Review noting that the recommendations of the Heritage Landscape Assessment are supported by Ngāi Tūāhuriri as appropriately protecting the mauri of Pūtarikamotu. A copy of MKT's report is attached as **Appendix C**.

SUMMARY OF FINDINGS FROM PŪTARINGAMOTU RICcarton BUSH HERITAGE LANDSCAPE REVIEW ADDENDUM - APRIL 2023

29. In April 2023, I was engaged by the Council to prepare an Addendum addressing omissions in the 2022 Heritage Landscape Review. This Addendum specified the need for additional controls beyond reduced building height that address the site density, and setbacks of buildings to better ensure the prominence of Riccarton Bush is retained.
30. In terms of bulk and location provisions, the Addendum recommended reducing the MDRS rule of enabling three residential units per site to two units per site. This recommendation aligns with Rule 14.4 of the operative Christchurch District Plan. Alongside this, the Addendum recommended reducing the MDRS controls for properties within the Riccarton Bush Interface Area from 50% of each property's net site area covered by

buildings, to 35% coverage. This recommendation aligns with the operative District Plan zoning site coverage. The Addendum also recommended that the proposed MDRS setbacks from the street remain the same as the operative District Plan, being a 4.5m setback for the area that is currently zoned as Residential Suburban. The Council has a bespoke Qualifying Matter for Riccarton Road, identifying a 4.5m building setback, so that a setback control was not proposed in this area. The Addendum recommended an increased setback for side boundaries in the Riccarton Bush Interface Area proposed by the MDRS changing from 1m and no setback required for common walls, to 3m for all internal side boundaries. The 3m setback aligns with the existing minimum legal width for rear accessways from all internal side boundaries.

31. The purpose of these recommendations is to reduce the opportunity for fast, incremental change to the Riccarton Bush setting that could significantly erode Pūtaringamotu as a distinctive element across the skyline. These controls also help protect the viewsheds around properties where Riccarton Bush's native vegetation can be viewed from surrounding streets.
32. In terms of subdivision controls, the Addendum recommended that the minimum site density for properties within the Riccarton Bush Interface Area be 450m², rather than having no minimum allotment size as proposed by the MDRS. This proposed figure still allows for some development, albeit limited, but attempts to retain the current grain of density allowed by the operative District Plan zoning in order to protect views of Riccarton Bush.
33. In terms of Specific Purpose (School) Zones, St Teresa's School lies within the Riccarton Bush Interface Area and the MDRS sets the building height limit at 12m. However, due to the school's location, the Addendum recommends the height limit remain at 8m – in line with the operative height controls within the District Plan for this school zone. The purpose of this recommendation is to achieve the same outcome as for the surrounding residential area – to protect the viewsheds of Riccarton Bush.

RESPONSE TO MATTERS RAISED IN THE RELEVANT SUBMISSIONS OPPOSING THE MORE ENABLING APPROACH PROPOSED BY THE MDRS

34. Thirteen submissions were received with respect to protecting the heritage landscape values around Riccarton Bush.

35. The submissions received that either supported the proposed controls contained in my heritage review or requested further controls were the Council's Submission, the Riccarton Bush Kilmarnock Residents Association Submission #188, the Waipuna Halswell Hornby Riccarton Community Board Submission #902, The Riccarton Bush Trust Submission #44, Te Mana Ora / Community and Public Health Submission #145, Michael Dore Submission #225, Alan Ogle Submission #876, Oliver Comyn Submission #50, Historic Places Canterbury Submission #835, Robert Leonard Broughton Submission #851, Helen Broughton Submission #886, Robyn Thomson Submission #686 and Tony Dale Submission #679.
36. These submissions focussed on the following issues:
- (a) Support for protections and the 8m height limit within the Riccarton Bush Interface Area.
 - (b) Additional controls within the Riccarton Bush Interface Area, that address site density (number of units, setbacks and subdivision) and height control over St Theresa's School.
 - (c) Extending the Riccarton Bush Interface Area to include all properties north of Riccarton Bush to Kahu Road, including both sides of Ngahere Street and adjacent to the Ōtākaro Avon River on Kahu Road.
 - (d) Maintain residential suburban density (2 storeys) in this area and for properties numbered 6 – 35 along Kahu Road.
 - (e) Include the Kauri Cluster within the Qualifying Matter.
 - (f) That the entire area represented by the Riccarton Bush Kilmarnock Residents' Association be designated a Qualifying Matter relative to Pūtaringamotu Riccarton Bush.
37. The Council support additional controls within the Riccarton Bush Interface Area, as identified in the Addendum, that address site density (number of units, setbacks and subdivision), including the setbacks of buildings to better ensure the prominence of Riccarton Bush is retained. The Council have also asked that height control over St Theresa's School which was noted in planning maps but not detailed in provisions is also reduced. The Council's submission seeks to correct errors and omissions and to increase the clarity and consistency of the notified Plan.

38. As author of the Addendum, I agree with the additional controls proposed in the Council's submission for the reasons outlined in the above section of my evidence.
39. Submitter #188 supports the Riccarton Bush Interface Area but believes its terms of reference are too narrow. The Association has requested that the Interface Area be extended to include properties north of Riccarton Bush bounded by Kahu Road, that in their opinion under the MDRS will block views to the Bush from both Kotare Street and Kahu Road. RBKRA have also requested that both sides of Ngahere Street are identified as part of the Riccarton Bush Interface Area rather than just the south side, which is currently the case.
40. I do not agree that the Interface Area should be extended to include the north side of Ngahere Street, nor the properties bounded by Kotare Street and Kahu Road north of Riccarton Bush. From Ngahere Street, no views of Riccarton Bush will be obscured that are not already within the overlay and while some trees within Riccarton Bush may be visible from Kotare Street and Kahu Road, they are not easily recognised as Riccarton Bush from this vantage point. Furthermore, much of the area north of Riccarton Bush is limited to two storeys as part of the Airport Noise Contour. This zone supports the protection of Riccarton Bush and Setting by retaining all operative Residential Suburban zoning.
41. If, in the future, the Airport Noise Contour is reduced and the block north of Riccarton Bush bounded by Kahu Road, Totara Street and Ngahere Street is removed from this Contour, the Riccarton Bush Interface Area should be extended to include the aforementioned properties as part of the Riccarton Bush Qualifying Matter. This would provide protection from disproportionate intensification adjacent to the Interface Area, should the Residential Suburban Zone change to High Density for example.
42. Submission #188 has requested better site density controls. I am satisfied that these site density controls have been addressed through the Council's submission.
43. Submission #188 has also requested that 34, 36 and 36A Kahu Road, adjacent to the Ōtākaro Avon River be included within the Riccarton Bush Interface Area, noting that the assessment does not adequately consider the impact of views towards these properties from the Riccarton Bush grounds. Kamo Marsh Landscape Architects have carried out an initial landscape

visual assessment (attached to the submission) that supports this opinion, identifying the visual impact to both outward views from the Riccarton House Grounds and inward views from Kahu Road.

44. From a heritage landscape perspective, I consider this recommendation appropriate and concur that development would have a greater visual impact as a contrast to the natural landscape feature of the Ōtākaro Avon River, which is part of the setting. In addition, should landowners choose to remove trees from these properties, the visual impact would significantly increase.
45. I therefore suggest that properties 34, 36 and 36A Kahu Road are added to the Riccarton Bush Interface. This amendment to the Interface is shown in **Appendix D**.
46. For properties numbered 6 – 35 Kahu Road, Submission #188 wishes to maintain residential suburban density as part of the Qualifying Matter.
47. As part of the Riccarton Bush Interface Overlay, these properties are in fact limited to two storeys. Furthermore, additional controls outlined in the Addendum and the Council's submission provide the site density, setback and subdivision controls required to protect the setting of Riccarton Bush and Riccarton House Grounds.
48. Submission #188 has also requested that the entire Kauri Cluster is retained as residential suburban zoning with a maximum of two storeys. The submission goes further to ask that the wider area represented by the Riccarton Bush Kilmarnock Residents' Association be designated a Qualifying Matter relative to Pūtaringamotu Riccarton Bush. This request was also made by Submission #686.
49. From a heritage landscape perspective, views to Riccarton Bush from streets outside of those noted in the proposed Riccarton Bush Interface Area (including parts of the Kauri Cluster) are not distinctive or prominent and have therefore not been included in the overlay. I therefore do not agree that the entire Kauri Cluster as requested by Submission #188 should be included in the Riccarton Bush Interface Area. My opinion on this matter also applies to the wider Riccarton Bush Kilmarnock Residents' Association area for the same reason.
50. Submissions #902 and #886 requests align with Submission #188, asking for further controls than recommended in both my Heritage Landscape Review and Addendum. Their submission asks that the Qualifying Matter area be

broadened to include the southern side of Rata Street to Rimu Street and Kauri Street and Kahu Road opposite the entrance to Riccarton House. Both submissions support the entire Kauri Cluster added as part of the Riccarton Bush Interface Area. Submission #902 has also asked that the Qualifying Matter be extended to include all of Ngahere Street and the houses adjoining the Ōtākaro Avon River.

51. Submission #876 also supports the Kauri Cluster as part of the Qualifying Matter and asks that the QM be extended to include all of Ngahere Street and the area between the Ōtākaro Avon River and Kahu Road.
52. Submission #50 requests that the Riccarton Bush Interface Area be amended to include the whole of Ngahere Street.
53. The matters outlined in the above 3 paragraphs have been addressed in my response to Submission #188 above.
54. Submissions #851 and #876 request that a new qualifying matter be added to the commercial area north of Riccarton Road within the Riccarton Centre. The submissions ask that this area be height-restricted to a height that is appropriate given the proximity of low-rise residential dwellings immediately to the north.
55. While the transition between the low-rise, two storey residential area and the commercial area will be abrupt, it is not within my area of expertise to comment on the contrast between these two zones. I consider protection of the heritage values are managed by two storeys and the MRZ in the areas adjacent to the commercial area. There are other concerns regarding the abrupt height difference in terms of good urban form, but these are not heritage concerns. I acknowledge that the transition between the zones will be harsh but that it is sufficiently important that the heritage values be protected.

RESPONSE TO MATTERS RAISED IN THE RELEVANT SUBMISSIONS SUPPORTING THE MORE ENABLING APPROACH PROPOSED BY THE MDRS

56. Thirteen submissions were received that supported the MDRS as more enabling in the Riccarton Bush Interface Area. These included the Ministry of Housing and Urban Development Submission #859, Scentre (New Zealand) Limited Submission #260, Kainga Ora – Homes and Communities Submission #834, Cameron Matthews Submission #121, Marie Mullins Submission #110, Matt Edwards Submission #189, Joshua Wight

Submission #199, Jono de Wit Submission #351, Tom Logan Submission #187, Logan Brunner Submission #191, John Campbell Submission #69, Tobias Meyer Submission #55 and Declan Bransfield Submission #905.

57. The submissions focussed on the following issues:
- (a) Careful consideration of Qualifying Matters that contain further reductions beyond height limits to ensure legislation is implemented properly, especially in light of Policy 6 of the NPS-UD.
 - (b) The introduction of Riccarton as a Metropolitan Centre rather than Town Centre Zone¹, allowing further intensification both within and adjacent to the centre, with an increased height limit to 53m within the commercial area and 36m (eleven storeys) surrounding this.
 - (c) Extend the High Density Residential Zone in Riccarton closer to Riccarton Bush and add a height variation overlay of 36m extending 1.2km from Riccarton Centre.
 - (d) Remove the Riccarton Bush Interface Qualifying Matter and all associated provisions (including the 8m height limit).
 - (e) Remove the Riccarton Bush Interface Qualifying Matter and all associated provisions (including the 8m height limit) BUT keep the 10m setback from Riccarton Bush boundaries.
 - (f) Significantly reduce the size of the Riccarton Bush Interface Area so that it covers the north side of Riccarton Bush only, away from the public transport corridor and town centre of Riccarton Road.
 - (g) No further restrictions placed on properties in the Interface Area than currently proposed by PC14.
 - (h) Reduce the area of Riccarton Bush Interface to the Council's original number of 40 sites.
58. Submission #859 broadly supports protecting Riccarton Bush through height limits on cultural grounds, however if additional controls are proposed (which they have been through the Addendum), the Ministry has requested they be considered carefully (in light of Policy 6 of the NPS-UD). I make reference to evidence by Mr Kleynbos on the applicability of Policy 6, only noting that this

¹ Please refer to s42A report by Mr Lightbody.

is a qualifying matter approach supported by Policy 4 of the NPS-UD and clause 3.32.

59. Additional controls identified in the Addendum have addressed site density and the setbacks of buildings and have been carefully considered to better ensure the prominence and protection of Riccarton Bush. The qualifying matter reduces Policy 3 intensification and MDRS only to the extent necessary.
60. Submissions #260 and #834 have requested a more enabling approach to intensification, asking that Riccarton be identified as a Metropolitan Centre, with intensification around the Riccarton centre which would include properties adjacent to Riccarton Bush. Submission #260 has requested that Rule 15.4.2.2 be altered to increase the maximum height limit in Riccarton from 22m to 50m.
61. I disagree with increasing the height limit to 50m across the Riccarton Bush Interface Area. Enabling this height limit, regardless of increased site density and subdivision controls, would overwhelm and dramatically reduce views of Riccarton Bush from residents and passers-by on suburban streets, except from properties that share a boundary with Riccarton Bush.
62. Submission #834 proposes extending the High Density Residential Zone in Riccarton closer to Riccarton Bush, adding a height variation overlay of 36m, 1.2km from Riccarton Centre. This would allow some buildings surrounding Riccarton Bush to be up to 36m high.
63. As I noted with Submission #260, I am not in agreement with a 36m overlay across the Riccarton Bush Interface Area, for the same reason that this height limit would adversely affect the contextual, landmark and historic values for which Riccarton Bush is considered significant.
64. Submission #834 has asked that the Riccarton Bush Interface Qualifying Matter and all associated provisions (including the 8m height limit) be removed, but that the 10m setback from Riccarton Bush boundaries remains intact. Submission #69 also requests that the Riccarton Bush Interface Area be removed.
65. I do not agree with removing the Riccarton Bush Interface Qualifying Matter and believe that greater intensification of this area will detract from and obscure the values for which Pūtarīngamotu is considered outstanding.

66. Submission #121 has also requested the Riccarton Bush Interface Area be removed from PC14, suggesting that the true amenity of Riccarton Bush and Grounds is unaffected by increased residential density.
67. I disagree with this opinion, as noted in my original report, that views of trees currently available to passers-by down driveways provide views to significant parts of Riccarton Bush as an outstanding feature, particularly since many are 3m wide and alongside another driveway, providing a 6m wide view of Riccarton Bush from the street. Furthermore, it is important to note that photographs are static and tend to flatten perspective so that the entire experience people have of Pūtarīngamotu as they move around adjacent streets is not always picked up from an image.
68. Submission #121 notes that the Interface Area is overly generous, extending broader than necessary.
69. I am not in agreement with this statement, noting that my assessment was made based on vantage points where Riccarton Bush is recognisable as a distinctive landmark, despite the number of roads and properties in between.
70. Submission #121 also contends that properties along Kahu Road provide no obstruction to Riccarton Bush and should therefore be omitted from the Interface Area.
71. This opinion fails to recognise that views FROM Riccarton House Grounds impact on the experience of the Riccarton Bush Setting. These views include those from within Riccarton House Grounds towards properties on Kahu Road, which at six storeys, have potential to dominate and distract from the existing relationships between heritage elements within the Riccarton Bush Setting.
72. Submissions #187, #189 and #191 request that the area of Riccarton Bush Interface is either reduced or reduced to the original number of 40 sites and #199 asks that the Interface height limit is amended beyond 8m. All four submissions suggest that “views from streets in the area amount to views of distant treetops, [and are] largely indistinguishable from the various street-trees and private plantings.”
73. I am not in agreement with this opinion. Properties included in the Riccarton Bush Interface Area are those that have the potential (with intensification) to obscure Riccarton Bush as a recognisable and distinctive landmark. With intensification (i.e., reduced interface area, increased height limits, no site

density or subdivision controls) views of Riccarton Bush will be severely compromised.

74. Submission #351 believes the Riccarton Bush Interface Area should be removed completely or reduced in size, so it is only on the north side of Riccarton Bush thereby increasing density along the Riccarton Road transport corridor and close to Riccarton Central. Submission #55 also supports a reduced Riccarton Bush Interface Area with increased density, suggesting that the south side of the Bush is very close to amenities and the local centre and within easy access to town.
75. I do not support a reduction in the size of the Riccarton Bush Interface Area. Some of the most dominant views of Riccarton Bush and Setting lie south of the site and are important to protect for their prominence in the urban environment.

CONCLUSION

76. In conclusion, with respect to the heritage landscape of Riccarton Bush and its setting, I remain of the same opinion I formed in my Heritage Landscape Review and Addendum except for the following changes I recommend be included in the notified PC14 proposal. These include the additional controls identified within the Council's submission that address site density, the setbacks of buildings, subdivision controls and height control over St Theresa's School. I also recommend that properties 34, 36 and 36A Kahu Road, adjacent to the Ōtākaro Avon River be included within the Riccarton Bush Interface Area.

Dated: 11 August 2023

Wendy Rosalie Hoddinott

APPENDIX A: ORIGINAL RECOMMENDED MODIFICATIONS AND ADDITIONS TO INTERFACE AREA - PROPOSED PROTECTION AND SETBACKS FOR PŪTARINGAMOTU RICcarton BUSH, DECEMBER 2022.

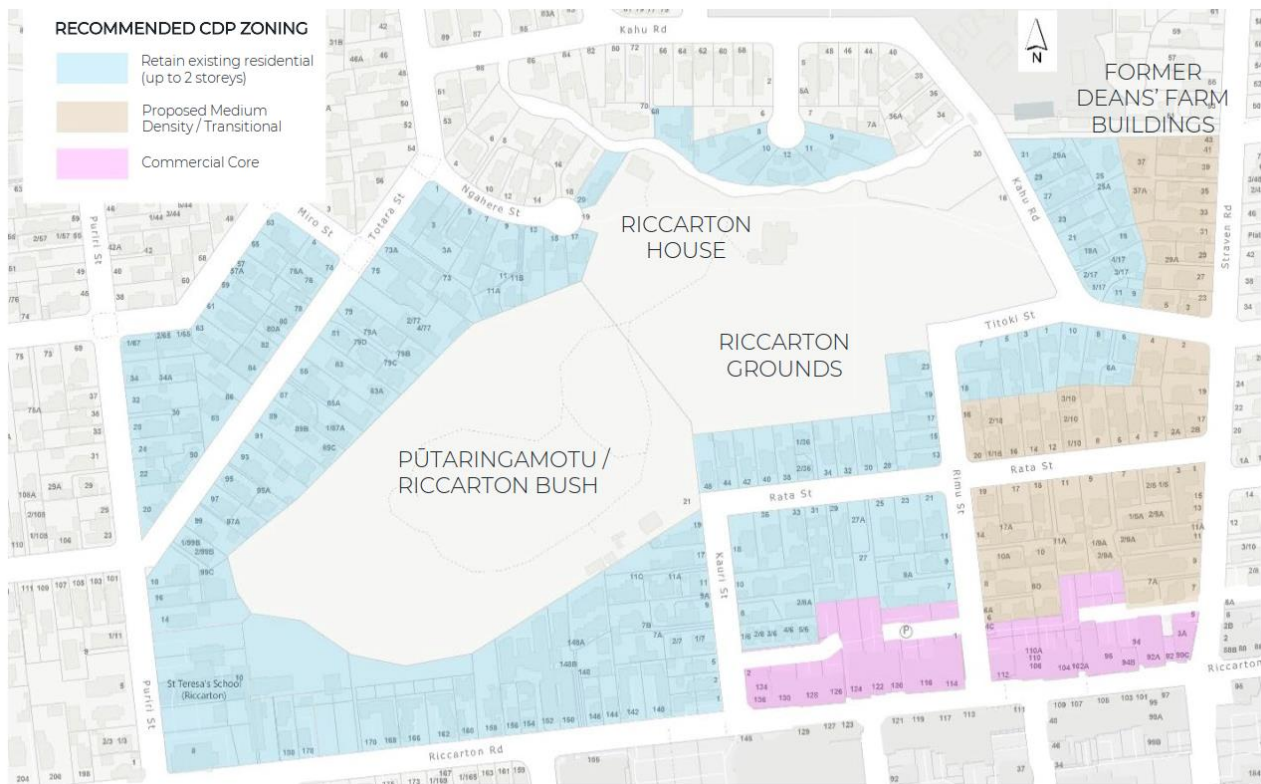


Figure 1: Original Heritage Landscape Review - recommended modifications and additions to Christchurch City Council proposed protection and setbacks for Pūtaringamotu Riccarton Bush.

Source: Pūtaringamotu Riccarton Bush Heritage Landscape Heritage Review, December 2022.

**APPENDIX B – HERITAGE LANDSCAPE REVIEW – ADDENDUM FOR
PŪTARINGAMOTU RICCARTON BUSH, APRIL 2023.**

(Overleaf)

4C-0010.00

Pūtaringamotu Riccarton Bush

Heritage Landscape Review - Addendum

26 April 2023

CONFIDENTIAL





Project:	Pūtaringamotu Riccarton Bush Heritage Landscape Review – Addendum
Client:	Christchurch City Council
Compiled by:	Wendy Hoddinott, Heritage Landscape Architect – Principal, WSP
Reviewed by:	John Lonink, Principal Urban Designer, WSP
Date:	26 April 2023
Status:	Final

Background / Purpose

Christchurch City Council is preparing a submission on their recently notified Housing and Business Choice Plan Change (PC14). The aim is to address omissions contained in Council's planning approach for properties that sit within the Riccarton Bush Interface Area, identified as part of Council's PC14 notification.

This Addendum provides additional heritage advice to Council, following the Pūtaringamotu Riccarton Bush Heritage Landscape Review¹ prepared by WSP in December 2022. This document was used by Council to assist with preparing the extent of the Riccarton Bush Interface Area and the planning controls needed to ensure that Pākehā/European heritage and landscape values of Pūtaringamotu are retained through PC14.

The Heritage Landscape Review identified Pūtaringamotu as a sensitive heritage site and setting, with high landscape, heritage and ecological values. The report noted that the contextual, landmark and historic values of Pūtaringamotu Riccarton Bush would be adversely affected by the increased building heights initially proposed. Views to Riccarton Bush can also be observed along the driveways and outdoor areas of adjacent residential properties, which foregrounded by residential tree canopies are part of the setting and contribute to the experience of Riccarton Bush while walking adjacent streets. The report found that the increased building height proposed in the Medium Density Residential Standards (MDRS) would obscure and significantly weaken this relationship between Riccarton Bush and its setting. In order to safeguard Pūtaringamotu's heritage values, the report recommended extending Council's initial Concept Interface Area, retaining the existing Residential Suburban Zone (up to 2 storeys), Medium Residential and Special Purpose (School) Zones.

While the report advised to retain the operative zoning of the above areas, the key focus of recommendations was to limit building height in the Interface Area.

Recommendations within the report were limited to those expressed in 2015 BECA reporting on residential character, and as such, did not further specify recommended bulk and location controls. The notified proposal for PC14 only sought to replace all High Density Residential Zone (HDZ) with Medium Residential Zone (MRZ) within the interface area, applying a specific overlay area to future limit building height to two storeys. Without further bulk and location controls, a noticeable change to the views of Riccarton Bush can occur, with potential to obscure visibility of Pūtaringamotu from residents and

¹ WSP (2022), *Pūtaringamotu Riccarton Bush Heritage Landscape Review*, prepared for Christchurch City Council.



passers-by within the Riccarton Bush setting. This Addendum provides additional recommendations to better articulate the conclusions on reporting. The goal is to ensure that the proposed changes in PC14 for the Riccarton Bush Interface Area will not detract from and obscure the values for which Pūtaringamotu is considered outstanding.

Recommended Additional Controls

The supporting information contained in this Addendum addresses omissions in the WSP Heritage Landscape Review and any shortcomings of the proposed built form standards.

Bulk and Location

Residential Activity

Under the MDRS, three residential units per site would be enabled (14.5.1.1.P1). A baseline of three units plus a liberalised subdivision lens with no site density would create opportunities for fast, incremental change to the Riccarton Bush setting. In order to ensure viewsheds of Riccarton Bush can be maintained, a two unit maximum per site is recommended. This recommendation aligns with Rule 14.4 in the operative district plan.

Site Coverage

The proposed MDRS controls for properties within the Riccarton Bush Interface Area allow 50% of the net site area to be covered by buildings which will have a tangible impact on building density and viewshafts. This creates potential for the bulk of buildings to significantly erode Pūtaringamotu as a distinctive element across the skyline. Building site coverage should therefore be restricted to 35% of each site (operative zoning site coverage) for properties that are part of the Interface Area, to ensure retention of viewshafts and visual connectivity between Pūtaringamotu and other planted elements in the landscape.

Height in Relation to Boundary (Recession Planes)

Of primary concern is the impact that buildings two storeys or higher have on the viewshafts and visibility of Riccarton Bush within the identified Riccarton Bush Interface Area. Applying MDRS daylight recession angles have the potential to reduce viewshafts to Riccarton Bush given the angles are significantly more permissive than operative zoning controls. These MDRS angles (or the alternative proposed through Council's Sunlight Access Qualifying Matter) would allow for two storey buildings to be constructed more closely together potentially reducing view shafts and affecting the visibility and presence of Pūtaringamotu. Instead of recommending further restrictions on recession planes, the Heritage Landscape Review (2022) and Addendum have focused on a combination of height controls, setbacks and limits to site density in order to protect the heritage setting.

Minimum Building Setbacks

Beca's 2015 Character Area 7 Report² provided context in the Heritage Landscape Review (2022), noting that the recommendations captured in Beca's report achieve the same visual outcomes necessary to protect the heritage setting of Riccarton Bush. The measures outlined included retaining the defining character elements of this area such as 1-2 storey single family dwellings, minimum 8m setbacks and large side setbacks to retain streetscape quality.

² Beca (2015), Christchurch Suburban Character Area Assessment prepared for Christchurch City Council, Character Area 7: Totara/Hinai/Puriri Assessment.



While front yard setbacks have less impact than side boundaries on views of Riccarton Bush, reduced setbacks as proposed in the MDRS enable buildings to be located much closer to the street thereby changing the frequency of views of Riccarton Bush for passers-by. We therefore recommend a road boundary setback of 4.5 metres for the area that is currently zoned Residential Suburban and 2 metres along any site on Riccarton Road. This is in line with the current operative zoning.

The proposed MDRS minimum building setback of 1m for side boundaries and no setback required for common walls will have a significant impact on viewshafts of Pūtaringamotu currently available between residential properties. It is therefore recommended that the 1m rule be replaced with a minimum 3m setback for internal side boundaries. 3m aligns with the existing minimum legal width for rear accessways from all internal side boundaries. Suburban viewsheds to Riccarton Bush have historically been set by residential accessways and a 3m internal side boundary setback provides protection for viewshafts between properties. These are viewshafts where pockets of Riccarton Bush's native vegetation can be viewed from surrounding streets and from where the broad expanses of trees above roofs across the skyline are also available.

Subdivision Controls

Controlled Activity

The MDRS outlines that no minimum allotment size is required where no vacant allotment created contains a residential unit, has resource consent for a residential unit or is concurrently proposed to have a residential unit via resource consent (Rule 8.5.1.2.C9). This rule has the potential to quickly increase bulk and occupation through incremental change and should not be applied within the interface area.

It is recommended instead that the minimum site density for properties within the Riccarton Bush Interface Area is 450m². This figure allows for some development, albeit limited in an attempt to retain the current grain of density provided with operative zoning and to protect views of Riccarton Bush. This recommendation applies to the Interface Area only (2 storey overlay). Areas that are MRZ only would retain a vacant allotment size of 400m² and no minimum density for existing or proposed dwellings.

Special Purpose (School) Zones.

While much of Riccarton Bush is currently screened by vegetation along the Riccarton Road boundary fence, views of Riccarton Bush are available from both within the school and as glimpses or viewshafts from streets surrounding the residential area. The MDRS sets the building height limit at St Teresa's School at 12m. Given the school lies within the Control Interface Area of Riccarton Bush, it is recommended that operative height controls of 8m are applied to this Special Purpose School Zone. The same outcome for protecting viewsheds of Riccarton Bush is expected within this area, as for the surrounding residential area.

**APPENDIX C – STATEMENT OF MANAWHENUA VALUES: PŪTARIKAMOTU,
MAHAANUI KURATAIAO LTD, DECEMBER 2022.**

(Overleaf)

Statement of manawhenua values: Pūtarikamotu

Background

The Christchurch City Council voted to not notify its proposed Housing and Business Choice Plan Change (PC14). This has enabled further analysis of the draft provisions. The Council have engaged Mahaanui Kurataiao to advise on the cultural effects of enabling intensified housing development at the perimeter of Pūtarikamotu/Riccarton Bush. PC14 is the Council's response to the The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021. This legislation requires councils in large urban areas to increase housing supply and allow a wider variety of homes to be built. The Act gives direction to councils in order to implement the requirements of the National policy statement on Urban Development (NPS-UD, 2020).

Mahaanui Kurataiao has been mandated by Te Ngāi Tūāhuriri Rūnanga who hold manawhenua in Christchurch City to prepare a statement of manawhenua values associated with Pūtarikamotu. This provides a description of the cultural values associated with Pūtarikamotu, the effect of housing intensification on these values, and is intended to act as evidence to support reducing the extent of intensification adjacent to the bush as a qualifying matter.

Proposal

It is understood that under the draft plan change, intensification around a portion of the site would be enabled up to 20m (six stories) in height. This level of intensification is due to the proximity of the site to the Riccarton commercial centre, and in accordance with Policy 3(d) of the NPS-UD. This would however be limited around the Northern perimeter of the bush by the restrictions associated with the airport noise contour. The initial approach by the Council to minimising the adverse effects of intensification on the bush was to reduce the maximum permitted building height to 12m (three stories) in the sites surrounding the perimeter. Pūtarikamotu is recognised as having a range of cultural and ecological heritage values, prompting the Council to further examine the implications of this approach. A Heritage Landscape Assessment has been prepared by Wendy Hoddinott of WSP to assist the Council in assessing the effectiveness of the draft provisions. This report demonstrates that the presence of three storey buildings would obscure the visual presence of the forest canopy, thereby having an adverse effect on the landscape values of the bush. It recommends that the existing plan provisions restricting building height to 8m (two stories) should be retained in an area containing approximately 250 lots in the periphery of Pūtarikamotu as a qualifying matter. The recommended area of influence is shown in Figure One.

Manawhenua Values associated with Pūtarikamotu

Pūtarikamotu is the sole remnant of the ancient podocarp forest that once characterised much of Kā Pākihi-whakatekateka-a-Waitaha/Canterbury Plains and is a significant cultural landscape.

Manawhenua have a particular interest in indigenous biodiversity, for its inherent value in the landscape, the ecosystem services it provides, and with regard to mahinga kai. Indigenous flora and fauna has sustained manawhenua for hundreds of years, providing food, fibre, building materials, fuel, medicine and other necessities. The relationship between manawhenua and indigenous biodiversity has evolved over centuries of close interaction and is an important part of Ngāi Tahu culture and identity.

The Ngāi Tahu Claims Settlement Act 1998 describes mahinga kai as “the customary gathering of food and natural materials and the places where those resources are gathered.”¹ Mahinga kai are central to Ngāi Tahu culture, identity and relationship with landscapes and waterways of Te Waipounamu.

Traditional place names or “ingoa wāhi” offer tangible connections between the past and the present, the people, the landscape, and associated practices and traditions. In “Grand Narratives”, the origin and meaning of the name Pūtarikamotu is described as follows:

“The name Pūtarikamotu has been subject to a good deal of speculation by historians and elders, all centring on the word ‘tarika’, which means ‘ear’. Most historians of Māori have a basic knowledge of Māori and ‘tarika’ is an obvious word to focus the attention because ‘pū’ and ‘motu’ do mean a clump of trees. As a result the most common translation is that that the area was ‘the place of the severed ear’. However, the text below gives a better indication of the true meaning of the name. Pūtarikamotu was a site where our elders snared forest fowl such as pigeon, the South Island kākā and the tūī, which we call kōkō. ‘Pū’ describes a bush or clump of trees. ‘Tari’ is a noose used to snare birds, as in ‘Ka tae ki runga ki te maunga, ka taria e ia te kiwi, ka mau’ (upon reaching the mountains, snares were set to catch the kiwi). ‘Motu’ can mean the island of trees, but it also refers to how fowlers would cut the snares for their birds. Therefore, Pū-tari-kamotu is likely to mean ‘the forest where the snares were cut’, – that is the forest where the birds were taken after they had been snared. There is no certainty about this name, but this interpretation aligns with the fact this site was a place to take forest fowl.”²

Pūtarikamotu was a site of historical occupation and use by manawhenua associated with the Ōtākaro (Avon River). This settlement was sited for strategic access to the resources of the river and the forest itself. In 1879, the Smith-Nairn Royal Commission of Enquiry was launched to examine grievances following the Canterbury Land Purchases. Pūtarikamotu was the subject of an unsuccessful claim for a mahinga kai reserve and Ngāi Tūāhuriri kaumātua gave evidence describing it as a kāinga nohoanga (settlement), kāinga mahinga kai (food-gathering place), and he pā tūturu where tuna (eels), kanakana (lamprey), and aruhe (bracken fernroot) were gathered. Pūtarikamotu was also described as a forest where whīnau (*Eleocarpus dentatus*), pōkākā (*Elaeocarpus hookerianus*), mātai (black pine), and kāhika (white pine) grew. The birds gathered here included kererū, kākā, kōkō (tūī), kōparapara (bellbird) and mahotatai.

Contemporary utility of Pūtarikamotu as a mahinga kai is limited by conservation legislation that prohibits customary harvest of protected species, and by the general fragmentation and degradation of surrounding ecosystems. However the historical role of Pūtarikamotu as a mahinga kai for Ngāi Tūāhuriri tūpuna (ancestors) connects manawhenua in the present to the landscape and their whakapapa associations with it.

Pūtarikamotu is prized as a taonga because of the representative nature of the remnant forest ecosystem. The forest supports taonga species including kererū, pīwakawaka, and kiwi which are either limited or absent in the deforested landscapes of Canterbury. The quality of this taonga ecosystem is why it is one of the few sites that have scored highly in State of Takiwā cultural assessments undertaken by manawhenua in the Ihutai catchment³. The historical associations and contemporary importance of the bush imbue within it a particular mauri or life force.

¹ Ngāi Tahu Claims Settlement Act, 1998

² Tau, TM. 2016. The values and history of the Ōtākaro and North and east frames in “Grand Narratives”. Page 51.

³ Mahaanui Iwi Management Plan, 2013. Page 239.

The Mahaanui Iwi Management Plan (IMP) policy direction is clear on the need to ensure council planning instruments protect Pūtarkiamotu. A key objective in the IMP is that *“Regional policy, planning and decision making in the takiwā reflects the particular interest of Ngāi Tahu in indigenous biodiversity protection, and the importance of mahinga kai to Ngāi Tahu culture and traditions.”*⁴

Policies directing for the need to protect sites such as Pūtari kamotu include:

TM1.2 To advocate that the protection and restoration of traditional and contemporary mahinga kai sites and species is recognised and provided for as a matter of national importance under the RMA 1991.

TM2.5 To require that city, district and regional plans include specific policy and rules to protect, enhance and extend existing remnant and restored areas of indigenous biodiversity in the takiwā.

IH7.4 To require that city and regional plans include specific policy and rules to protect, enhance and extend existing remnant and restored natural habitat areas in the catchment, including but not limited to:
(b) Pūtari kamotu (Deans Bush)

The effects of development on Pūtari kamotu were discussed in a 2001 report prepared for the Riccarton Bush Trust Board⁵. The report evaluated a range of effects including root damage, fire, shading, hydrological changes, vegetation cutting, and reduced amenity value. The operative district plan provisions in conjunction with the management of the bush by the Trust Board appear to manage these effects to a degree that is sufficient to maintain the mauri of the bush. However it is reasonable to anticipate these effects would be amplified if the sites adjacent to the bush were subject to the level of intensification that would be enabled under the draft provisions.

The stature of the kahikatea canopy represents a significant cultural landscape within a highly modified urban environment. The visual presence is a significant component of the enduring mauri of Pūtari kamotu. The Heritage Landscape Assessment provides clear evidence that this presence would be undermined under the draft provisions.

Conclusion and recommendation

The mauri of Pūtari kamotu would be adversely affected by the imposing presence of three-story buildings enabled within its periphery under the draft provisions. The establishment of a qualifying matter which lessens this effect is supported by manawhenua as providing better protection of the bush as a taonga with significant cultural landscape values. While manawhenua support the general intent of enabling housing intensification, such a culturally and ecologically sensitive site must be afforded appropriate protection from the effects of urban development.

Section 6 of the Resource Management Act (1991) requires decision makers to recognise and provide for the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga as a matter of national importance. The recommendations of the Heritage Landscape Assessment as outlined in Figure One are supported by Ngāi Tūāhuriri as more appropriately protecting the mauri of Pūtari kamotu.

⁴ Mahaanui Iwi Management Plan, 2013. Page 127.

⁵ Chrystal & Norton. 2001. Potential impacts of peripheral development on Riccarton Bush.



Figure one: Recommended zoning to buffer Pūtaringamotu from the effects of housing intensification.

APPENDIX D – RECOMMENDED MODIFICATIONS AND ADDITIONS TO INTERFACE AREA - PROPOSED PROTECTION AND SETBACKS FOR PŪTARINGAMOTU RICCARTON BUSH, JUNE 2023.

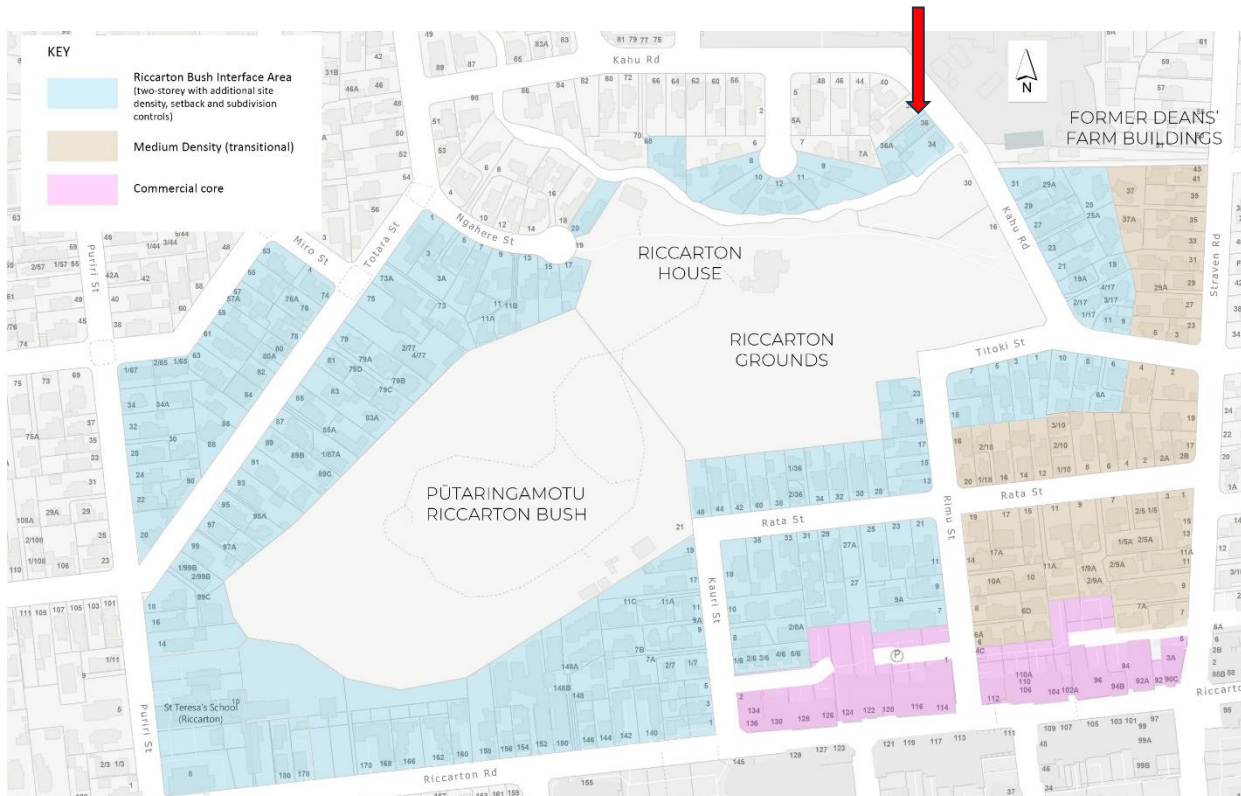


Figure 2: Amended plan from original Heritage Landscape Review. Properties 34, 36 and 36A Kahu Road (additional area indicated), are now included in the Riccarton Bush Interface Area. Additional site density, setback and subdivision controls are also recommended for the Riccarton Bush Interface Area.

Source: Canterbury Maps, 2022 with graphic overlay.