



14 September 2023

Independent Hearings Panel – Housing and Business Choice Plan Change (PC14) to the Christchurch District Plan

via email: info@chch2023.ihp.govt.nz

Attention Secretariat Director, Jo Daly

Dear Lisa,

**Christchurch District Plan, Housing and Business Choice Plan Change (PC14) – Submission made by Canterbury Jockey Club (submission reference 1059)**

Canterbury Jockey Club made a submission on Proposed Heritage Plan Change 13 (PC13) to the operative Christchurch District Plan (*District Plan*) (submission reference 1059). On 30 May 2023, Canterbury Jockey Club confirmed that its submission should be treated as being on both PC13 and Housing and Business Choice Plan Change 14 (PC14).

Canterbury Jockey Club's submission:

- supports the proposed deletion of the listing of the 'Riccarton Racecourse Public Grandstand and Setting' listing as a Significant Historic Heritage Item in Appendix 9.3.7.2;
- supports the retention of the HNZPT listed 'Riccarton Racecourse Tea House' as a scheduled heritage item in the District Plan;
- supports the revised 'Statement of Significance' on the basis that it deletes reference to the 'Riccarton Racecourse Public Grandstand' and retains reference to the 'Riccarton Racecourse Tea House';
- supports the reduction of the area subject to a Heritage Setting notation (operative notation Heritage Setting 183);
- does not support the extent of proposed Heritage Setting 684 that is shown on the Proposed Heritage Items and Settings Aerial Maps and Natural and Cultural Heritage Planning Map 30C; and
- seeks that the area subject to the Heritage Setting 684 notation is further reduced to more accurately reflect the area that provides the context and setting for the tea house by including the landscaped area and moat in the 'setting', which are intrinsic to the Tea Rooms building and its historical context, but to exclude areas that have no heritage relationship to the tea rooms building and surrounds.

Canterbury Jockey Club's submission therefore seeks:

- the retention of the deletion of Heritage Item 453 from Appendix 9.3.7.2 Schedule of Significant Historic Heritage Items as notified;
- the retention of the updated Statement of Significance 'Christchurch District Plan – Scheduled Heritage Place Heritage Assessment – Statement of Significance Heritage Item Number 452 Riccarton Racecourse Tea House and Setting – 165 Racecourse Road, Christchurch' as notified;
- the retention of the deletion of Heritage Setting 183 from the Heritage Items and Settings Aerial Maps and Natural and Cultural Heritage Planning Map 30C as notified.

- amendment to Heritage Setting 684 as shown on the Heritage Items and Settings Aerial Maps and Natural and Cultural Heritage Planning Map 30C (as illustrated in the submission).

Canterbury Jockey Club's submission is addressed in the '*Planning Officer's Report of Suzanne Amanda Richmond Under Section 42A of the Resource Management Act 1991*' dated 11 August 2023 (Section 42A Report) as follows:

*"8.1.73 The Canterbury Jockey Club S1059.1 and S1059.3 supports the removal of the Riccarton Racecourse Public Grandstand (heritage item 453), 165 Racecourse Road, from Appendix 9.3.7.2 and the deletion of the shared setting with Riccarton Tea House from the planning maps, (resource consent for demolition of the grandstand granted 18 October 2022). The submitter S1059.2 also seeks to reduce the new setting for the teahouse notified by Council. In her technical evidence, Amanda Ohs opposes the submitter's proposed setting, but has proposed a further amendment to the setting (attached to her evidence), which I adopt. She considers this better reflects the historical context of the tea house by protecting important landscape features and the visual connection with the racecourse."*

Canterbury Jockey Club's submission is also addressed the 'Statement of Primary Evidence of Amanda Emma Ohs on behalf of Christchurch City Council Heritage Qualifying Matter: Heritage (Listed Heritage Items)' dated 11 August 2023 (Expert Evidence) as follows:

*"Riccarton Tea House, 165 Racecourse Road*

40. *Council proposed a setting in PC14 as notified which reduced the setting for Riccarton Tea House in the District Plan (Heritage item 452 Heritage Setting 684). The submitter (Canterbury Jockey Club, #1059) seeks to reduce this further, as identified on a map in their submission (Appendix 4). I do not support the squared off setting put forward in the submission as it does not relate to the landscape forms of the setting that are integral to the contextual values of the tea house. I support a reduction of the notified Setting, however not to the extent or design that the submitter seeks – I have proposed a revised setting in Appendix 5.*
41. *I consider this revised setting to be the minimum required in order to ensure views and physical connection to the racecourse are maintained, as well as protecting important landscape features such as the evidence of the former moat and the treed perimeter. In my opinion, retaining the unimpeded physical and visual connection of the tea house with the racecourse is an important aspect of the heritage values of the tearooms, which enabled women to participate in the spectator sport as they were denied access to the stands due to alcohol being served there.*
42. *I accept the exclusion of part of the tree lined accessway leading to the area of the site in which the tea house is located. It is usual practice for Settings to include accessways from the street as this is usually key to their heritage values, historical and ongoing use. However, in this case, given the great distance of the tea house from the main entry point to the racecourse site, I do not consider it is justified to include the accessway in whole or part.*
43. *The proposed revised Setting reduces the operative setting area to the south-west beyond the moat as this is a grassed area, more utilitarian in character, with accessory buildings. The proposed Setting reduces the operative setting to the west and brings the boundary closer to the moat landforms but includes the tree perimeter on the other side of the moat landforms as this was part of the original landscape design.*
44. *In conclusion I do not support the revised Setting requested in the submission, however I do support a reduced setting from that in the proposed plan as shown in Appendix 5."*

The purpose of this letter is to advise the Independent Hearings Panel that Canterbury Jockey Club has reviewed the Section 42A Report, and accompanying Expert Evidence, and agrees with the conclusion in the Expert Evidence and recommendation in the Section 42A Report. Canterbury

Jockey Club therefore supports the reduced heritage setting area shown in Appendix 5 to the Expert Evidence.

On this basis, Canterbury Jockey Club has elected not to file evidence or be heard or in relation to its submission. That said, Canterbury Jockey Club is available to respond to any questions the Independent Hearings Panel may have.

Canterbury Jockey Club requests that this letter be provided to the Independent Hearings Panel and tabled as a statement at the relevant hearing to confirm its position in relation to its submission and the Section 42A Report recommendations.

Should the Independent Hearings Panel have any questions or require clarification of any matter, please contact Ainsley McLeod on +64 27 215 0600 or [ainsley@amconsulting.co.nz](mailto:ainsley@amconsulting.co.nz).

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Ainsley McLeod', with a long horizontal flourish extending to the right.

**Ainsley McLeod**  
Director/Planner  
Ainsley McLeod Consulting Limited