

**IN THE MATTER OF** Resource Management Act 1991

**AND**

**IN THE MATTER OF** Proposed Plan Change 14 Housing and  
Business Choice pursuant to Part 5, subpart  
5A and Part 6 of Schedule 1 of the Resource  
Management Act 1991

---

**MINUTE 41:**

**IHP RESPONSE TO A REQUEST BY THE RICcarton Bush Kilmarnock  
RESIDENTS' ASSOCIATION INC FOR ADDITIONAL TIME TO PRESENT COMMENT ON  
THE APPLICATION OF POLICY 3 NPS-UD IN LIGHT OF SIGNALLED CHANGES TO  
GOVERNMENT POLICY**

---

- [1] This is the forty first (41) procedural Minute to be issued by the Independent Hearings Panel (IHP) established by the Christchurch City Council (the Council) to conduct the hearing of submissions on proposed Plan Change 14 Housing and Business Choice (PC 14) notified by the Council and to make recommendations to the Council, after the hearing of submissions is concluded, pursuant to Part 5, subpart 5A and Part 6 of Schedule 1, of the Resource Management Act 1991 (RMA).
- [2] The purpose of this Minute is to:
- (a) Respond to a request by the Riccarton Bush Kilmarnock Residents' Association Inc<sup>1</sup> (RBKRA) to add additional time to their scheduled appearance on 24 April 2024 to address matters of interpretation (and application) of Policy 3 NPS-UD considering government policy announcements.

## **Background**

- [3] The RBKRA lodged a comprehensive submission in response to PC 14, which focused on the following matters:
1. Centre designations and boundaries appropriate for the level of activity and services in those centres.
  2. Appropriate density and height limits for the level of activity and services.
  3. The extent of walkable catchments – which should also define the extent of high-density residential zones.
  4. Qualifying matters that might justify reducing the level of intensification enabled.
- [4] The RBKRA also lodged further submissions in support and opposition to other submitters on related issues.
- [5] On Wednesday 8 November 2023 Mr Simons, the chair of the RBKRA appeared before the IHP to speak on a range of matters. He also called four other members of the RBKRA, Ms Julia van Essen, Mr Ray Simpson, Ms Pip Sutton and Mr Tim Preston. That presentation also included points which elaborated on the concerns of the RBKRA. One of RBKRA witnesses, Ms Catherine Shipton was unavailable to attend on 8 November 2023 and is scheduled to appear on 24 April 2024. We confirm that we have scheduled up to 15 minutes for that witnesses to appear.

---

<sup>1</sup> Riccarton Bush Kilmarnock Residents Association #188 #2062

[6] Mr Simons has now requested additional time on behalf of RBKRA, specifically the request seeks to address the following:<sup>2</sup>

The coalition government has clarified its position with regard to urban intensification in Christchurch, and that position strongly supports a view that it is not needed.

The government's position is different to the original directions made with respect to MDRS and in the NPS-UD, and on which the public was consulted.

These changes are relevant as all the measures previously demanded had flow-on impacts.

The material changes are:

1. MDRS will no longer be mandatory
2. The government expects sufficient housing capacity enabled to meet 30 year demand.
3. Councils will have the ability to determine how they meet that 30 year intensification enablement target.

We do accept Policy 3 of the NPS-UD requires (and the government supports) a high level of intensification along rapid transit routes. However, while rapid transit is a topic ripe for discussion, there are no such routes (as defined in the NPS-UD) in Christchurch's long-term plan and, until there are, that intensification is not required.

Additionally, and notwithstanding the fact that Policy 3 of the NPS-UD requires intensification within walking catchments around city centres, we submit the level of such intensification (if any) should be commensurate and consistent with the government's stated position.

Policy 3 of the NPS-UD requires the benefits of intensification to be maximised, but does not define that level. That is for the IHP to determine and, we submit, it need not exceed the 30 year government target where it is shown superfluous intensification enablement may have a negative impact on existing communities.

With all this in mind, we urge the IHP to support Qualifying Matters but limit zoning changes to intensify in line with government policy direction.

This is a very significant issue for our lower Riccarton residential area, and other city and neighbourhood centres across Christchurch. We would appreciate the opportunity to reinforce our views based on the new evidence now at hand.

[7] Submitters are limited to calling evidence and making submissions on the matters raised in their submission.

---

<sup>2</sup> Email from RBKRA to IHP Secretariat on 5 April 2024 at 5.20pm

[8] We are satisfied that issues of the application of Policy 3 as it applies to Riccarton are within the scope of matters raised by the RBKRA in its submission. Their submission addresses both the proposed characterisation of Riccarton as a Large Town Centre and the size of walkable catchments, as well as a range of qualifying matters. However, we do not need to hear further from the RBKRA in relation to Policy 3 of the NPS-UD. The points raised have been well covered by their written submission and in the presentations made on 8 November 2024 and there are submissions both in support or are consistent with the RBKRA, and submitters who take a different view. The IHP itself has asked many submitters and their witnesses about the meaning and interpretation of Policy 3.

[9] Pursuant to section 40(2) of the Act we decline the request based on undue repetition.

[10] As noted in Minute 36 and 40, we will make our recommendations interpreting and applying the law as it stands.

**Decision on request for more presentation time.**

[11] The IHP declines the request by the RBKRA to have additional time to speak to the matters raised in their email of 5 April 2024.

Dated 9 April 2024



Cindy Robinson  
Chair  
for Independent Hearings Panel