

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 12: RESPONSE TO CORRESPONDENCE RECEIVED FROM COMBINED
RESIDENTS' ASSOCIATION CHRISTCHURCH**

Introduction

- [1] This is the twelfth 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 respond to correspondence received from the Combined Residents' Association Christchurch (CRA). A copy of the letter is attached as Appendix 1.

Request to pause process.

- [3] CRA have requested the IHP to pause the hearings on PC 14 because:
- (a) Council officers who prepared the 's42A Reports' have made recommendations to increase housing intensification around a number of shopping centres and the central city beyond that which was proposed in the notified plan change.
 - (b) The public was not told of these changes and anyone who is not already a submitter is now prevented from submitting because there is no time, and the RMA says they are too late.
 - (c) It is not fair.
 - (d) They have concerns regarding cost of the process to ratepayers and the possibility of a change in government policy post-election.

Panel response

- [4] We note that the CRA is not itself a submitter or further submitter (submitter) on PC 14 and as such does not have standing before the IHP to request an adjournment or delay to the hearing process of which they are not a party to¹.
- [5] The letter is not signed but lists 19 residents' associations from Christchurch, including Banks Peninsula, and two heritage and/or public interest groups.

¹ Council webpage with reports including summary of submissions and further submissions:
<https://makeasubmission.ccc.govt.nz/PublicSubmissionSearch.aspx>

- [6] Some of the listed associations and groups are submitters on PC 14 in their own right and have requested to be heard at the upcoming hearings.
- [7] It appears to us that CRA may have misunderstood our role in the Intensification Streamlined Planning Process. We have been appointed by the Council pursuant Clause 96, Part 6 of Schedule 1, of Resource Management Act 1991 (RMA) to hear submissions and to make recommendations, after the hearing of submissions is concluded, to the Council on PC 14.
- [8] The IHP hearing procedures published on the IHP website: chch2023.ihp.govt.nz explains our expectations about the evidence of submitters and Council staff or consultants in the hearing process. Relevant to the correspondence from CRA is:

Section 42A Report Writers

- [28] Council staff and consultants are involved in the preparation of reports (known as s42A reports). These reports summarise and evaluate the submissions received on each of the hearing topics.
- [29] The report writers will attend the hearings and be available to answer any questions from the Hearings Panel and may be cross examined. The s42A report constitutes part of the body of evidence to be considered by the Hearings Panel, alongside the evidence of submitters.
- [30] The s42A reports may contain recommendations from Council staff or consultants for the consideration of a Hearings Panel. The recommendations are not binding on a Hearings Panel. Furthermore, the s42A reports carry no greater weight than any other material to be brought forward by, or on behalf of, any submitter.
- [9] The s42A Reports were filed and published on the IHP website on 11 August 2023, and submitters had until 20 September 2023 to file their expert evidence. Submitter expert evidence filed is now available on the IHP website. Submitter non expert evidence is not required to be pre circulated and can be presented during that submitter's scheduled hearing time. Submitters may, in their expert or non-expert evidence or presentations, respond to the recommendations contained within the s42A Reports as they relate to their submission points, including, raising issues as to the scope or merits of the authors recommendations in response to submissions on PC 14.
- [10] Hearings will commence on 10 October 2023 and continue to 30 November 2023, and resume in the new year for a further six days on 30 January to 1 February and on 13 to 15 February 2024. Submitters requiring more time during the scheduled hearings to present their submissions and evidence beyond that prescribed in the hearing

procedures may request additional time for their presentation as set out at paragraph [63] of the hearing procedures.

[11] Parties to the hearings (Council and submitters) can raise procedural matters at any time in accordance with paragraph [35] of the hearing procedures and the IHP will determine the appropriate process to address such matters, including seeking the views of Council representatives and affected submitters.

[12] The IHP will make recommendations in a report to the Council following hearing of all evidence (expert and non-expert) and submissions and representations made both in support and in opposition to the plan change. It will be a matter for the Council whether it accepts or rejects any recommendation of the IHP.

Dated 26 September 2023

A handwritten signature in black ink, appearing to read 'Cindy Robinson', with a long, sweeping flourish extending to the right.

Cindy Robinson

Chair

for Independent Hearings Panel

Appendix 1

23 September 2023

**Combined Residents'
Associations
Christchurch**



e. cra.christchurch@gmail.com

Cindy Robinson
Chair
Independent Hearings Panel
Christchurch City Council Plan Change 14

Tēnā koe Ms Robinson,

PAUSE PLAN CHANGE 14

This letter is a formal request asking for a pause to the PC14 hearings process to ensure Christchurch residents and ratepayers are treated fairly in this process.

The city council, the owner of this change, wrote some s42A reports last month proposing intensification be increased in and around almost every shopping centre in Christchurch and in the central city - significantly more than was proposed in the notified version of the plan.

The public was not told of these late and significant changes. What's more anyone who has not already submitted on the notified version is now prevented from submitting because there is no time, and the RMA says they are too late.

That's not fair.

The table below (provided to us by CCC staff) illustrates the magnitude of the late changes now recommended in suburban high-density areas.

Centre / Type	Residential Centre Type	Notified Catchment		Recommended	
		Walking Catchment	Building Height	Walking Catchment	Building Height
Riccarton***	Large Town Centre	600	20	<u>800</u>	<u>22</u>
Papanui	Large Town Centre	600	20	<u>800</u>	<u>22</u>
Hornby	Large Town Centre	600	20	<u>800</u>	<u>22</u>
Shirley	Town Centre	400	20	<u>600</u>	<u>22</u>
Linwood	Town Centre	400	20	<u>600</u>	<u>22</u>
North Halswell	Town Centre	400	20	<u>600</u>	<u>22</u>
Church Corner	Large Local Centre	400	20	400	<u>22</u>
Ferrymead	N/A	N/A	N/A	N/A	N/A
Merivale	Large Local Centre	400	20	400	<u>22</u>
Sydenham North	Large Local Centre	400	20	400	<u>22</u>
New Brighton	N/A	N/A	N/A	N/A	N/A
Bishopdale	*Small Local Centre	200	14	<u>400</u>	<u>14</u>
Barrington	*Small Local Centre	200	14	<u>400</u>	<u>14</u>
Belfast/Northlands	**Town Centre	400	14	400	14
<u>Halswell</u>	*Small Local Centre	N/A	N/A	<u>400</u>	14
Prestons	Small Local Centre	200	14	200	14
<u>North West</u>	Small Local Centre	N/A	N/A	<u>200</u>	<u>14</u>
<u>Belfast</u>	Small Local Centre	N/A	N/A	<u>200</u>	<u>14</u>
<u>Richmond</u>	Small Local Centre	N/A	N/A	<u>200</u>	<u>14</u>
<u>Wigram</u>	Small Local Centre	N/A	N/A	<u>200</u>	<u>14</u>
<u>Sydenham South</u>	Small Local Centre	N/A	N/A	<u>200</u>	<u>14</u>

These changes impact much of the city and clearly show increased building heights over what was notified.

In Riccarton Hornby and Papanui, the extent of High Density (HRZ) areas goes from 600m to 800m and height limits from six storeys (20m) to seven or eight.

Additionally, in a large part of Riccarton it is proposed building heights be increased from the notified six storeys to eight or nine (28m). In central city residential areas heights of 12 storeys (from 10 storeys) are proposed.

In support of a pause, we are also mindful of the large amount of ratepayer money being spent (wasted?) when a general election is imminent, and government policy changes may follow that will have a direct impact on intensification policy.

This new enablement, we are told, will provide enough capacity to cope with population growth we won't see in Christchurch for another 150 years and the city council says it is doing it simply "because the government has required it".

Please pause PC14 to provide time to publicise the latest changes and give all stakeholders fair and reasonable time to consider impacts and make submissions.

Thank you for your consideration.

Addington Neighbourhood Association
Central Riccarton Residents' Association
Charleston Neighbourhood Association
Christchurch Civic Trust
Church Corner Residents' Association
Cracroft Residents' Association
Deans Avenue Precinct Society
Englefield Residents' Association
Greater Hornby Residents' Association
Halswell Residents' Association
Ilam and Upper Riccarton Residents'
Association

Inner City West Neighbourhood Association
Lower Cashmere Residents' Association
Papanui Heritage Group
Riccarton Bush Kilmarnock Residents'
Association
St Albans Residents' Association
Somersfield Residents' Association
Spreydon Neighbourhood Network
Takamatua Ratepayers' Association
Victoria Neighbourhood Association
Westmorland Residents' Association