

**BEFORE AN INDEPENDENT HEARINGS PANEL  
IN CHRISTCHURCH**

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

**UNDER** the Resource Management Act 1991 (the **RMA**)

**AND**

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

---

**STATEMENT OF REBUTTAL EVIDENCE OF CLARE JOAN PIPER ON BEHALF  
OF CHRISTCHURCH CITY COUNCIL**

**SPECIFIC PURPOSE (SCHOOL) ZONE  
SPECIFIC PURPOSE (TERITARY) ZONE**

**Dated: 9 October 2023**

---

TABLE OF CONTENTS	
EXECUTIVE SUMMARY	1
INTRODUCTION	1
SCOPE OF REBUTTAL EVIDENCE	2
REZONING REQUESTS	3
ALTERNATIVE ZONES	4
SPECIFIC PURPOSE (SCHOOL) PROVISIONS	6

## EXECUTIVE SUMMARY

1. This rebuttal evidence addresses matters raised in relation to the Specific Purpose Zones including, more specifically:
  - (a) Rezoning requests – Specific Purpose (School) zone (**SPSZ**).
  - (b) Alternative zones – Specific Purpose (Tertiary Education) (**SPTZ**) and (School) zones.
  - (c) Specific Purpose (School) zone provisions.
2. For reasons discussed below I re-confirm my view that the re-zoning requests are not accepted.
3. However, having reviewed the evidence of submitters I agree that amendments should be made in relation to specific SPTZ and SPSZ land that is outside of the Airport Noise Influence Area (**ANIA**) qualifying matter to have an alternative zoning.
4. With respect to the SPSZ provisions, I consider heritage items and settings on school land are adequately protected by the heritage provisions of PC14 but that changes should be made to the continuous building length rule to provide clarity.

## INTRODUCTION

5. My name is **Clare Joan Piper**. I am a Senior Policy Planner in the City Planning Team with Christchurch City Council (**Council**).
6. I prepared two planning officer's reports pursuant to section 42A of the Resource Management Act 1991 (the **Act / RMA**) dated 11 August 2023. One of my reports (numbered 10B, referred to in this evidence as my **Section 42A Report (10B)**) related to the issues raised by submissions as they applied to:
  - (a) SPSZ,
  - (b) SPTZ,
  - (c) the Specific Purpose (Hospital) Zone (**SPHZ**); and
  - (d) the following qualifying matters (**QMs**) that effect these zones:

- (i) Low Public Transport Accessibility Area (**LPTAA**) QM;
  - (ii) ANIA QM;
  - (iii) Flood Management Area (**FMA**) QM;
  - (iv) Coastal Hazard Management Area (**CHMA**) QM;
  - (v) Tsunami Management Area (**TMA**) QM;
  - (vi) Waste Water Constraint Area (**WWCA**) QM;
  - (vii) Residential Character Area (**RCA**) QM;
  - (viii) Residential Heritage Area (**RHA**) QM; and
  - (ix) Sunlight Access QM.
7. I have the qualifications and experience set out at paragraphs 2.1.2 – 2.1.3 of my Section 42A Report (10B) dated 11 August 2023.
8. I repeat the confirmation given in my Section 42A Report that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023, and that my evidence has been prepared in compliance with that Code.

### **SCOPE OF REBUTTAL EVIDENCE**

9. In preparing this rebuttal statement, I have read and considered the evidence filed on behalf of submitters, as that evidence relates to my Section 42A Report (10B) including that of:
- (a) Ms Catherine Boulton on behalf of submitter #699, Christ's College;
  - (b) Mr Jeremy Phillips on behalf of submitter #832, Catholic Diocese of Christchurch;
  - (c) Ms Caroline Hutchison on behalf of submitter #184, University of Canterbury;
  - (d) Mr Darryl Millar on behalf of submitter #852, Christchurch International Airport Limited; and
  - (e) Mr Jeremy Phillips on behalf of submitter #841, Carter Group Limited.
10. In this evidence I respond to the following issues:

- (a) **Rezoning requests:** Extension of SPSZ for specific sites zoned residential (#699 Christ's College – Ms Boulton, and #832 Catholic Diocese of Christchurch – Mr Phillips).
  - (b) **Alternative zones:** SPTZ for the University of Canterbury (#184 University of Canterbury – Ms Hutchison) and Specific Purpose (School) zone located under the notified ANIA QM (#852 Christchurch International Airport Limited – Mr Millar).
  - (c) **Specific Purpose (School) Provisions:** Heritage provision and continuous building length (#841 Carter Group – Mr Phillips, and #823 Catholic Diocese of Christchurch – Mr Phillips).
11. Where I am relying on the primary evidence or rebuttal evidence of technical witnesses for the Council, I make that clear in this rebuttal evidence.

## REZONING REQUESTS

12. Planning evidence has been provided by Ms Boulton<sup>1</sup> and Mr Phillips<sup>2</sup> seeking to rezone specific sites from residential to SPSZs.
13. These matters were addressed in section 7.5 of my Section 42A Report (10B), in which I recommended rejecting these rezoning requests as being 'out of scope' of PC14.
14. When considering the information now provided by both Ms Boulton and Mr Phillips, no additional rationale has been provided that in my opinion would support an increase of SPSZ (and consequently a decrease in available residential zoned land) that would support policy 3 of the National Policy Statement on Urban Development.
15. It is noted that the proposed changes to the SPSZ as per PC14 seek to increase height for those school sites that have surrounding residential land that has also been further enabled – as a commensurate response to the residential zone enabled by policy 3. I consider this approach to be the most appropriate method that supports policy 3.
16. Nonetheless, if the Independent Hearing Panel (**Panel**) considers the rezoning requests as being 'in-scope', given the amended request of Mr

---

<sup>1</sup> [Christs-College-699-Evidence-Catherine-Boulton-Planning.pdf \(ihp.govt.nz\)](#)

<sup>2</sup> [Catholic-Diocese-of-Christchurch-823-2044-Evidence-of-Jeremy-Phillips-Planning.pdf \(ihp.govt.nz\)](#)

Phillips (i.e. reduction of sites requested to be rezoned) and information on the overall site considerations by Ms Boulton, on the merits I would be comfortable amending my recommendation to accept these requests. I am able to elaborate on this point at the hearing if it assists.

## ALTERNATIVE ZONES

17. Planning evidence has been provided by Ms Hutchison<sup>3</sup> and Mr Millar<sup>4</sup> concerning the alternative zones for SPZs.
18. For the reasons provided below, having reviewed the evidence provided, I agree with their respective evidence and recommend accepting the amendments as proposed.

### Specific Purpose (Tertiary Education) - University of Canterbury

19. Amendments to Appendix 13.7.6.1 are required to correctly identify SPTZ land that is outside of the ANIA QM to have an alternative zone that is commensurate with the surrounding residential zoned land.
20. The area affected is shown in Ms Hutchison's report as **Figure 5-1**:

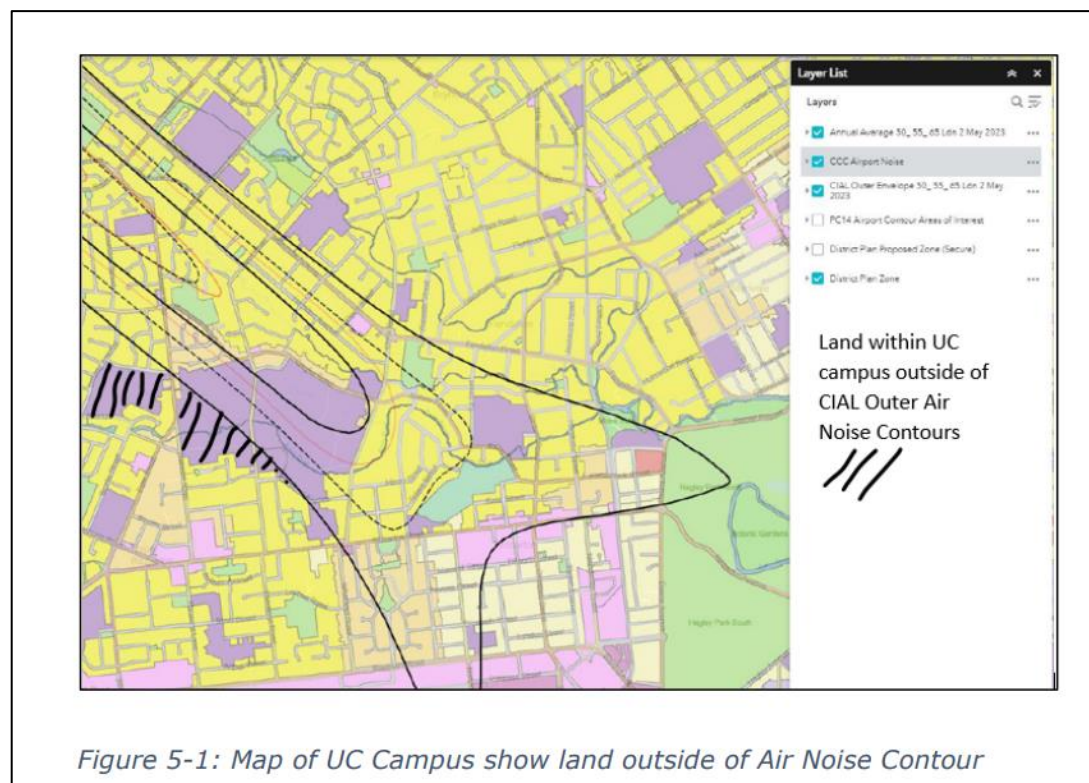


Figure 5-1: Map of UC Campus show land outside of Air Noise Contour

<sup>3</sup> [University-of-Canterbury-184-Tabled-Evidence-Caroline-Hutchison-UPDATED.pdf \(ihp.govt.nz\)](#)

<sup>4</sup> [Microsoft Word - Darryl Millar evidence PC14 3466-9417-3734 v.3 \(ihp.govt.nz\)](#)

21. I agree with the wording amendments to Appendix 13.7.6.1 provided by Ms. Hutchinson, and recommend they are accepted as follows:

	Tertiary Facilities Name	Location	Map Ref	Alternative Zone
1	UC east of Ilam Road <span style="color: green;">site</span>	East of Ilam Road, Ilam	31A	<del>RSDT-MRZ</del> <b>except those parts of the site which fall outside the 50, 55 and 65 dBA Ldn Noise Contours shall be MRZ</b>
2	UC west of Ilam Road <span style="color: green;">site</span>	West of Ilam Road, Ilam	30/31A	<del>RS</del> <del>MRZ</del> <b>except those parts of the site which fall outside the 50, 55 and 65 dBA Ldn Noise Contours shall be MRZ</b>
3	UC Dovedale <span style="color: green;">site</span>	Dovedale Avenue, Ilam	30A	<del>RS</del> <del>MRZ</del> <b>MRZ</b>

### Specific Purpose (School) – ANIA QM

22. As noted in my Section 42A report (10B) concerning the application of the QMs, changes to the 'alternative zone' were required to the tables located in 13.6.6 Appendices to correctly reflect the residential zone those sites where located within.
23. Mr Millar's<sup>5</sup> evidence correctly identifies school sites that were inadvertently missed when considering the extent of the ANIA QM. As such, I agree with Mr Millar and recommend changes to the alternative zones for school sites, namely:
- (a) Christchurch Boys' High School – Residential Suburban (**RS**);
  - (b) Christchurch Girls' High School – RS;
  - (c) Ilam Primary School – RS; and
  - (d) St. Teresa's – RS.

<sup>5</sup> [Microsoft Word - Darryl Millar evidence PC14 3466-9417-3734 v.3 \(ihp.govt.nz\)](#)

## **SPECIFIC PURPOSE (SCHOOL) PROVISIONS**

24. Planning evidence has been provided by Mr Phillips<sup>6</sup> with regards to two provisions in the SPSZ.

### **Heritage items and settings – Rule 13.6.4.2 (a)**

25. Mr Phillips is correct in his review of Rule 13.6.4.1.a, in that it is the intent of that clause for school sites that are occupied by heritage items and settings to have the heritage provisions in Chapter 9.3 apply. These matters should have primacy over the development of school sites which contain heritage items and settings.
26. As such, I disagree with Mr Phillips' evidence that those sites require additional built form standards, and I consider there to be sufficient assessment matters within 9.3.6.1 Matters of Discretion to provide a review of what is appropriate development for that site.
27. Further matters raised by Mr Phillips with regards to the RHA application for a specific site are addressed by Ms Dixon's rebuttal evidence.

### **Continuous Building Length – Rule 13.6.4.2.4**

28. I agree with Mr Phillips that amending the wording of the 'continuous building length' rule would assist in understanding of the purpose of the rule.
29. When considering the trigger for when a building should be reviewed for continuous building length, Ms Mackay in her rebuttal evidence expresses the view that the rule should apply buildings within 15 metres of an internal boundary with HRZ. I agree with her assessment of this.
30. As such, I accept in part the proposed wording, and recommend the following wording:

*a. The wall of any building which is parallel to, and within 15 metres of an internal boundary, building shall either:*

**Clare Piper**

9 October 2023

---

<sup>6</sup> [Carter-Group-Limited-814-824-2045-Evidence-of-Jeremy-Phillips-Planning.pdf \(ihp.govt.nz\)](#)