

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

**STATEMENT OF REBUTTAL EVIDENCE OF WENDY HODDINOTT ON
BEHALF OF CHRISTCHURCH CITY COUNCIL**

PŪTARINGAMOTU RIC CARTON BUSH INTERFACE AREA

Dated: 9 October 2023

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INTRODUCTION

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 prepared a statement of primary evidence on behalf of Christchurch City Council (**Council**) dated 11 August 2023. My primary evidence addressed the extent of Riccarton Bush Interface Area (**RBIA**) as a Qualifying Matter and matters arising from the submissions and further submissions on Plan Change 14 to the Christchurch District Plan (the **District Plan; PC14**).
3. In this rebuttal evidence I respond to submitters' evidence regarding height and site density controls relative to the RBIA, outlining areas of agreement, points of contention and Residential Medium Density Zone (**RMD**) sites on Riccarton Road.
4. I have the qualifications and experience set out at paragraphs 17 – 19 of my primary evidence.
5. I repeat the confirmation given in my primary evidence 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

6. In this evidence I respond to issues regarding the RBIA. My evidence primarily responds to the evidence of Ms Sophie Strachan (landscape) on behalf of Kāinga Ora. My evidence refers to the Joint Witness Statement that Ms Strachan and I signed following conferencing on 27 September 2023 (**JWS**).
7. I also respond to the evidence of Ms Kim Seaton (planning) for Kauri Lodge Rest Home 2008 Limited in respect of the RMD height limit and sites on Riccarton Road.
8. My rebuttal covers the following topics:
 - (a) Areas of agreement between me and Ms Strachan:
 - (i) Additional RBIA sites.

- (ii) Allotment size.
 - (iii) St Theresa's School and Special Purpose Zone.
 - (iv) MDZ for properties adjacent to RBIA.
- (b) Points of contention between me and Ms Strachan:
- (i) Site coverage.
 - (ii) Building setbacks.
- (c) RMD height limit and sites on Riccarton Road.

AREAS OF AGREEMENT BETWEEN ME AND MS STRACHAN

9. Ms Strachan and I agreed on a number of points during expert witness conferencing, as set out in the JWS. I have highlighted a number of those matters below.

Additional RBIA Sites

10. Ms Strachan and I agree that the properties identified in Appendix A of my Statement of Evidence, (that is 34, 36 and 36A Kahu Road) should be added to the RBIA.

Allotment size

11. Ms Strachan and I agree that a 450m² minimum allotment size is appropriate for all sites within the RBIA.

St Theresa's School and Special Purpose (School) Zone

12. I have changed my position with respect to the introduction of the Riccarton Bush Interface Area within St Theresa's School. I agree with Ms Strachan that it is appropriate to retain ODP height controls of 10m (rather than 8m outlined in my evidence) within 20 metres of an internal boundary and 14 metres beyond that (as per operative standard 13.6.4.2.5). My reasoning is that, while views of Riccarton Bush are available from both within the school and as glimpses or viewshafts from surrounding streets, the depth of the school site is relatively large compared to the adjacent residential area. After considering this matter further, additional controls as originally outlined in my evidence would have limited influence.

MDZ for Properties Adjacent to the RBIA

13. Ms Strachan and I agree that a transitional approach is appropriate for properties immediately adjacent to the proposed interface sites on the eastern side of the RBIA, as shown in my evidence (Appendix D). This approach would include 12m height limits for properties adjacent to the RBIA with no additional controls.

POINTS OF CONTENTION BETWEEN ME AND MRS STRACHAN

14. The JWS records points remaining in contention between me and Ms Strachan. Below I address points where my thinking has evolved since the JWS was signed.

Site Coverage and Riccarton Road Residential Medium Density

15. Ms Strachan believes that restricting building coverage to 35% of each site rather than 50% of each site's area is excessive for Riccarton Road sites that are currently zoned RMD under the Operative District Plan.
16. I agree with Ms Strachan on this point, although I note that the site coverage I proposed matches the operative controls for Residential Suburban sites, which are by far the majority of sites in the RBIA.
17. However, in order to address the Riccarton Road sites currently zoned RMD, I recommend retaining the 35% building coverage across the RBIA with a specific exemption of 50% building coverage for RMD sites on Riccarton Road. Full details of these properties are: Lots 1 & 2 DP 16509 (1-8/148 Riccarton Road), Flat 1 & 2 DP 56964 on Lot 2 DP 10241 (1-2/146 Riccarton Road), Lots 1,2,4 DP 12416; Lots 3,4 DP 16509 (154 & 154A Riccarton Road).

Building Setbacks

18. Ms Strachan and I agree that the 4.5m front boundary setback should apply to all properties in the RBIA.
19. However, Ms Strachan disagrees with my recommendation of side boundary setbacks at 3m. The intention of my recommendation is to retain the existing viewshafts of Riccarton Bush down driveways given that viewsheds have historically been set by residential accessway widths.

20. I agree with Ms Strachan that the 3m side boundary setbacks are more restrictive than the 1m side boundary setback in the Operative District Plan. However, having read Ms Strachan's evidence and considered this matter further, I recommend an alternate position of a side boundary setback of 1m and 3m either side of a dwelling. This would provide for a driveway on at least one side of a dwelling, maintaining a viewshaft. Non-complying development could be considered through the resource consent process on a case-by-case basis.

RMD HEIGHT LIMIT AND SITES ON RICCARTON ROAD

Kim Seaton's Evidence

21. With regard to Ms Seaton's evidence on behalf of Kauri Lodge Rest Home 2008 Ltd, I agree that my evidence did not recognise the existing RMD zoning and the Accommodation and Community Facilities Overlay provisions (non-residential activities) where I proposed an 8m height limit for sites in these zones. After considering this matter further I agree that it is appropriate to retain building height limits of 11m in these areas, so that they are aligned with the Operative District Plan.
22. With regard to setbacks in the RMD, I accept as Ms Seaton states, that *"there are no rules in the District Plan that specify where driveways must be located relative to views of Riccarton Bush, nor that existing driveways must be retained"*. However, I consider it important to retain existing viewshafts of Riccarton Bush available down driveways that have been historically set by accessway widths. As set out above, I now recommend a side boundary setback of 1m and 3m either side of the building.
23. With regard to Ms Seaton's comments about building coverage and site density (number of units), I agree (as I have noted above) that:
- (a) a specific exemption should apply to those sites within the existing RMD zone (as per sites quoted above); and
 - (b) operative rules for these sites should apply, including the application of the Accommodation and Community Facilities Overlay.

Sophie Strachan's Evidence

24. Ms Strachan also notes that under the Operative District Plan no minimum number of units are required for RMD on Riccarton Road. I agree with Ms Strachan and as per my response to Ms Seaton's evidence, consider an exemption for the Riccarton Road sites is appropriate.

Dr Wendy Hoddinott

9 October 2023