

**BEFORE A COMMISSIONER APPOINTED BY THE CHRISTCHURCH
CITY COUNCIL**

IN THE MATTER OF

the Resource Management Act 1991

AND

IN THE MATTER OF

Proposed Housing and Business Choice
Plan Change (PC14)

**STATEMENT OF EVIDENCE OF CAROLINE HUTCHISON TO BE
TABLED ON BEHALF OF THE UNIVERSITY OF CANTERBURY
(SUBMITTER 184)**

(PRINCIPAL PLANNER, STANTEC)

Dated: 20 September 2023

1 INTRODUCTION

- 1.1 My name is Caroline Hutchison. I hold the position of Principal Planner at Stantec NZ. I have been in this position since March 2023.
- 1.2 I hold a bachelor's degree from Massey University in Resource and Environmental Planning (Hons). I have over 20 years of experience in resource management and development planning.
- 1.3 My experience covers work in the private sector as a consultant, local and central government, and the education sector. I have worked broadly in the infrastructure, land development (consents and feasibility), policy (Plan change and RMA policy development), and space management areas, with particular expertise in resource and strategic planning and business case development.
- 1.4 Previous employment included 3.5 years as Campus Development and Space Manager with the University of Canterbury (the University). In that role I was responsible for oversight of all resource management matters of interest for the University. I also had a key role in formulating strategy and policy on how the University campuses will be developed and how physical space within the University is managed to meet the strategic goals of the University.
- 1.5 I have been engaged by the University to provide planning evidence to support their submission on Plan Change 14 (PC14) to the Operative Christchurch District Plan (OCDP).
- 1.6 Whilst this is not an Environment Court hearing, I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2014. I have complied with it in preparing this evidence. The evidence I give is within my area of expertise. I have considered all material facts that are known to me that might alter or detract from the opinions that I express in this evidence. I am authorised to provide this evidence on behalf of the University (submitter 184).

2 **SCOPE OF EVIDENCE**

2.1 My evidence is structured as follows:

- (a) Summary of Evidence;
- (b) Overview of the University of Canterbury and its role within the physical context of the Ilam Neighbourhood.
- (c) Alternative Zone for Specific Purpose Tertiary Zone (SPTZ) – Appendix 13.7.6.1;
- (d) Urban amenity and quality of the urban environment – Objective 3.3.7 a. iv;
- (e) Managing Reverse Sensitivity (Policy 14.2.3.7 a. iv. D, Policy 14.2.5.3 a. vii, Matters of Control and Discretion 14.15.3 a. vi and 14.15.4 a.v.);
- (f) Reflecting the spatial distribution of both Medium (MRZ) and High Residential Zone (HRZ) in Policy - Policy 14.2.1.1 a. iii;
- (g) Conclusion.

2.2 I have read and considered the Christchurch City Council S42A planning reports and relevant evidence prepared by the following Council Officers (including all supporting documents) pursuant to the Resource Management Act 1991 (RMA):

- Sarah Oliver, Strategic Overview, Strategic Directions Chapter 3, Qualifying Matters relating to Strategic and City Infrastructure and Coastal Hazards
- Ike Kleynbos, Residential Chapter
- Clare Piper, Specific Purpose – School, Tertiary and Hospital Zones

3 **SUMMARY OF EVIDENCE**

3.1 The need to restrict population density within the updated Air Noise Contours to protect the Airport and its operations is understood and accepted. However, some parts of the University campus do not fall within the spatial extent of the updated air noise contours, and as such it is my opinion that those parts of the campus retain the

proposed Alternative Zone, as notified in Appendix 13.7.6.1, MRZ, for the SPTZ.

- 3.2 The proposal by Council Officers to recognize and strengthen Objective 3.3.7 a. iv to maintain and enhance of amenity values and the quality of the environment as an expressed outcome is supported. This is important, as the objectives set a foundation for assessing non-compliance, and for implementing regulation.
- 3.3 The inclusion in Chapter 14, in policy and matters of control and discretion, to consider reverse sensitivity effects on lawfully established non-residential activities in the Residential Chapter is supported (Policy 14.2.3.7 a. iv. D, Policy 14.2.5.3 a. vii, Matters of Control and Discretion 14.15.3 a. vi and 14.15.4 a.v.). It will allow Council to consider the impacts on lawfully established non-residential activities for any residential development beyond the established baseline rules which trigger consent.
- 3.4 The recognition of not just high density, but medium density as well, specifically in Policy 14.2.1.1 a. iii, is sought, to reflect Council Officers recommendation, and to adequately reflect the spatial outcomes for both MRZ and HRZ in residential spatial distribution outcomes for the City.

4 **OVERVIEW OF THE UNIVERSITY OF CANTERBURY AND ITS ROLE WITHIN THE PHYSICAL CONTEXT OF THE ILAM NEIGHBOURHOOD**

- 4.1 The University is a destination location for many City residents daily and has a strong presence in the local community in terms of the immediate physical and built environment. In their submission the University generally support enabling concentrated and more dense development to provide for much needed housing supply while recognising the need to ensure that the natural and built environment adjoining the campus retains its amenity within the community.
- 4.2 In their submission the University seek that the surrounding scale, layout and design of the residential environment retains an appropriate high-level of amenity and design as it transitions to more densely populated living environments. The amenity of the

neighborhood, sense of place and community maybe adversely impacted without appropriate provisions in the District Plan.

5 ALTERNATIVE ZONE FOR SPECIFIC PURPOSE (TERTIARY EDUCATION) ZONE – APPENDIX 13.7.6.1

- 5.1 The University submission supported notified proposed PC14 to apply a MRZ as Alternative Zoning in the SPTZ to the relevant University campus sites in Appendix 13.7.6.1 [#184.4].
- 5.2 Christchurch International Airport Limited (CIAL) [#852.1, 852.2, 852.25] in their submission sought to amend the spatial extent of the Air Noise Qualifying Matter on the planning maps. The amendment would show the outer extent of the updated 2023 50dBA Idn Air Noise Annual Average and Outer Envelope contours (Airport Noise Influence Area – ANIA), and the operative contour. As a result, CIAL sought that all land located within the updated ANIA retain the OCDP zoning which maintains lower population density. A large proportion of the University campus falls within the requested a ANIA spatial extension.
- 5.3 Council Officer, Ms. Oliver¹, is of the opinion that managing residential (population) density is the most effective method to address reverse sensitivity effects on the airport through limiting the number of people exposed to airport noise. As such, Ms. Oliver considers an appropriate response is retaining the operative zoning, as compared to higher density zoning options, within the ANIA. Council Officer, Ms. Piper², also accepts the submission from CIAL [#852.25] in so far as Appendix 13.7.6.1 be amended to retain the operative zoning to represent the relevant Qualifying Matter, in this case, the ANIA. Ms Piper also notes and accepts other s42A reports, specifically in relation to the area/extent of the ANIA Qualifying Matter, and the consequential amendments required to the SPTZ appendices.
- 5.4 I note that while the ANIA impacts the alternative residential zone in the SPTZ, all other activities within the SPTZ zone are exempt under

¹ S42A Report, Ms. Oliver, paragraph 12.63-12.64

² S42A Report, Ms. Piper, paragraph 8.2.1-8.2.7

existing Rule 3.3.12b(iii)(D) (renumbered through PC14 as rule 3.3.13) , as confirmed by Ms Piper³.

5.5 While the ANIA is accepted as a Qualifying Matter, including the amendments to its spatial extent, not all of the University campus is covered by the updated ANIA. Figure 4-1 below identifies land within the University campus which is zoned SPTZ but not affected by the ANIA.

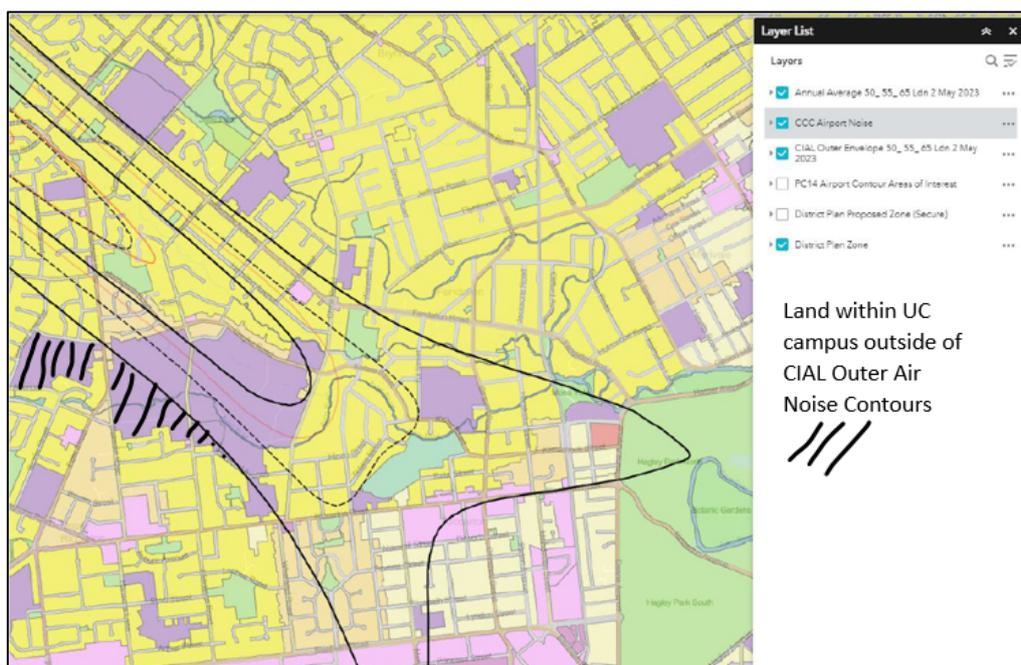


Figure 5-1: Map of UC Campus show land outside of Air Noise Contour

5.6 In my opinion those parts of the University campus zoned SPTZ and located outside the proposed ANIA should retain the notified PC14 MRZ zoning for the following reasons:

- a) The Alternative MRZ zoning will assist with 'compensatory intensification' loss from ANIA, an approach that Mr Kleynbos⁴ has adopted in identifying other areas for inclusion for MRZ and HRZ.
- b) HRZ has been proposed to be extended to the southern boundary of the University Ilam campuses , and closer to the Dovedale Campus to the west of Waimariri Road ⁵ as

³ s42A Report, Ms. Piper, paragraph 5.4.4.

⁴ S42A Report, Mr. Kleynbos, paragraph 6.1.91 -6.1.99.

⁵ S42A, Mr. Kleynbos, paragraph 6.1.95

'compensatory intensification'. An Alternative MRZ Zoning on University land (zoned SPTZ) adjoining the high-density extension will be an appropriate transition in scale, and in some cases commensurate with the bulk and scale allowed for within the SPTZ, and in keeping with other MRZ land adjoining the location outside ANIA.

- 5.7 In my opinion the following amendments should be made to Appendix 13.7.6.1 to the OCDP (or in a form Council deem appropriate that achieve the same outcome):

	Tertiary Facilities Name	Location	Map Ref	Alternative Zone
1	UC east of Ilam Road site	East of Ilam Road, Ilam	31A	RS DT MRZ <u>except those parts of the site which fall outside the 50, 55 and 65 dBA Ldn Noise Contours shall be MRZ</u>
2	UC west of Ilam Road site	West of Ilam Road, Ilam	30/31A	RS MRZ <u>except those parts of the site which fall outside the 50, 55 and 65 dBA Ldn Noise Contours shall be MRZ</u>
3	UC Dovedale site	Dovedale Avenue, Ilam	30A	RS MRZ <u>MRZ</u>

- 5.8 In regard to paragraph 5.6 (b) of my evidence, it is my opinion that the proposed HRZ extension by Mr Klenbos⁶, subject to good urban design and amenity provisions, is appropriate, not just with regard to its closeness to commercial centres and transport corridors, but in regard to scale and density allowed for in the SPTZ.

⁶ S42A, Mr. Kleybos, paragraph 6.1.95

6 **URBAN AMENITY AND QUALITY OF THE URBAN ENVIRONMENT, OBJECTIVE 3.3.7**

- 6.1 Council Officer, Ms Oliver⁷, recommends an addition to Objective 3.3.7 to guide the urban growth, form and design of the city as follows.

3.3.7a.iv. Recognises that whilst amenity values will change through the planned redevelopment of the existing urban area, the amenity values and the quality of the urban environment will be maintained and enhanced

- 6.2 In my opinion the addition of 3.3.7a.iv. specifically recognises that the maintenance and enhancement of amenity values and the quality of the environment as an express outcome. This is important, as the objectives set a foundation for assessing non-compliance, and for implementing regulation.
- 6.3 I concur with the reasoning of Ms Oliver⁸, that good amenity outcomes and intensification can co-exist, and that density can be done well.

7 **MANAGING REVERSE SENSITIVITY**

- 7.1 BP Oil, Z Energy and Mobil Oil Submission [#212] request additional considerations for reverse sensitivity effects on lawfully established non-residential activities in the Residential Chapter as part of Policy 14.2.3.7 a. iv. c. [#212.7], Policy 14.2.5.3 a. vii. [#212.9]; and Matters of Control or Discretion 14.15.3 a. vii and 14.15.1 a. v. [#212.14 & 212.15].
- 7.2 Council Officer, Mr Kleynbos, supports greater consideration of reverse sensitivity⁹ in the Residential Chapter to protect lawfully established activities within or adjoining residential areas.
- 7.3 In my opinion the additions sought in submission 212, and those accepted by Mr Kleynbos (14.2.3.7, Policy 14.2.5.3; and Matters of Control or Discretion 14.15.3 and 14.15.2) will allow Council to consider the impacts on lawfully established non-residential activities

⁷ S42A report, MS Oliver, paragraph 9.21 – 9.22

⁸ S42A report, Ms. Oliver, paragraph 9.45-9.50

⁹ S42A report, Mr. Kleynbos, Page 184, 187, Page 200 – paragraph 10.1.263, page 202 – paragraph 10.1.272

for any development beyond the established baseline rules which trigger consent. Avoiding or mitigating effects on lawfully established non-residential activity is important to enable people and communities to provide for their social, economic and cultural well-being.

8 **REFLECTING THE SPATIAL DISTRIBUTION OF BOTH MRZ AND HRZ IN POLICY 14.2.1.1 a. iii**

- 8.1 Policy 14.2.1.1 in the OCDP details the outcomes sought for residential housing distribution and density across the City. PC 14 enables both medium and high density near commercial centres and where there is access to social and transport services, however PC 14 only referred to 'high' density in Policy 14.2.1.1 a.iii as follows:

"high density residential development in.....and open spaces"

- 8.2 In their submission the University (#184.1) sought that Policy 14.2.1.1 a. iii reflect the spatial distribution of both MRZ and HRZ and be reworded as follows:

*iii. **medium and** high density.....and open spaces"*

- 8.3 In my opinion that specific reference to both HRZ and MRZ needs to be reflected in Policy 14.2.1.1. The University submission [#184.1] on this point has been accepted by Mr. Kleybos¹⁰, however the PC14 updates as a result of the S42A reports do not show any change to the provision to include 'medium' density. It is requested that the inclusion of the 'medium' density reference is added as per the University submission.

9 **Conclusion**

- 9.1 It is my opinion that generally PC14 and the post-notification amendments find the right balance between providing for the opportunity for more dense development while maintaining amenity to an appropriate standard, in the most value add locations i.e. close to commercial, community and social nodes, and transport corridors.

¹⁰ S42A report, Mr. Kleybos, Page 181

- 9.2 The proposed amendments, supported through this evidence, will ensure that the amenity of the community, and ability of non-residential development to operate lawfully and to its full opportunity (i.e., managing reverse sensitivity of lawfully established non-residential activity) is provided for and managed.
- 9.3 It is sought, that those parts of the University campus unaffected by the expanded ANIA, retain the Alternative MRZ as per notified PC14, both due to its location close to important commercial, community and social nodes, and because of the appropriate transition in scale, and in some cases commensurate with the bulk and scale allowed for within the SPTZ.



Caroline Hutchison

September 2023