

**Subject:** FW: MEMORANDUM from Victoria Neighbourhood Association - For IHP Pre-Hearing Consideration  
**Sent:** 31/07/2023, 9:21:49 pm  
**From:** Geoff Banks<geoff.banks@bfe.nz>  
**To:** IHP Info  
**Attachments:** [Consultation Approach.pdf](#)

---

**From:** Geoff Banks  
**Sent:** Sunday, July 30, 2023 7:58 PM  
**To:** [info@ihp.govt.nz](mailto:info@ihp.govt.nz)  
**Cc:** VNA Christchurch <[vnachristchurch@gmail.com](mailto:vnachristchurch@gmail.com)>  
**Subject:** MEMORANDUM from Victoria Neighbourhood Association - For IHP Pre-Hearing Consideration

Dear Panel.

Thank you for your Pre-Hearing Agenda and attachments.

As a result of our reviews of the extensive documentation we have seen to date, and our submission, we wish to provide this memorandum for your consideration under item (e) of the Pre-Hearing Agenda, related to the draft hearing schedule.

We attach our Submission Topic 10: Consultation Approach, which was part of our primary submission of 6 May 2023. However, on review of the records of Submitter 61 – Victoria Neighbourhood Association (VNA), we cannot see any direct reference to this matter within the 67 sub-headings under the name of VNA. It may be that this matter was not considered a matter concerning the merits or substance of the plan change itself. However, it would seem to be a matter falling within section (e) of the Pre-Hearing Agenda as we sought a decision under section 3.1 to reset the period of submissions to at least 9 months.

Given that a very large quantity of submissions and further submissions have been tabled, with submissions in person at the hearing yet to be started, we would ask for your consideration of this reset from 1 August 2023 such that the completion of the submissions to the IHP extends for 9 months from that date. We consider that this would allow more complete and useful submission from the public and voluntary community organisations for the reasons stated in Topic 10 of our submission.

We do wish to avoid unreasonable delay. We did however seek sufficient time for all stakeholders to consider the matters in proportion to the changes proposed to this city by PC14 and several thousand submissions and further submissions. We understand that you may have authority to waive or extend time periods in the interests of the community in achieving adequate assessment of the effects of a proposal such as PC14.

In addition to the overall time period, we would appreciate that components of time frames such as the time available to each submitter to the IHP be at least doubled, given the scale and complexity of the matters, as well as the scale of impact of decisions.

We appreciate your consideration of this matter.

Nga Mihi

Geoff Banks  
58 Gracefield Ave, Christchurch 8013

Chair, Victoria neighbourhood Association's PC14 Subcommittee

E [geoff.banks@bfe.nz](mailto:geoff.banks@bfe.nz)

## Plan Change 14 Submission BY The Victoria Neighbourhood Association (VNA)

### Introduction to the VNA

This feedback is submitted on behalf of the Victoria Neighbourhood Association Inc, one of six residents' groups in Christchurch Central City. Its boundaries are Victoria Street – Bealey Avenue – Colombo Street – Salisbury Street and which includes Airedale Place; Beveridge, Conference, Durham, Montreal and Salisbury Streets; Gracefield Avenue and Knox Lane. See map below.



The VNA was formed in 1985 (incorporated in 2010). Its primary objectives are to

- enhance and protect residential amenity in the neighbourhood;
- ensure members and other residents are kept up to date on matters affecting them;
- respond to consultations and surveys from at least the Christchurch City Council, our Community Board and ECan;
- represent members' views in submissions and presentations; and
- initiate or support social activities in or near the neighbourhood.

We currently have 180 financial members. Another 60 residents and property owners participate in some VNA activities and are consulted on matters affecting the wider neighbourhood. We also communicate with 70 or more residents via notices in letterboxes.

The VNA has participated in all stages of Plan Change 14, including City Council briefings on 17 April, 2 May and 5 May 2022; Council meetings on 12 July, 8 and 13 September 2022 and 1 March 2023; webinars of 14 December 2022 and 16 February 2023. VNA provided written feedback on CCC's initial proposals on 12 May 2022 and presented VNA's perspective to Councillors on 8 September 2022.

The VNA neighbourhood is arguably the most diverse in the city, encompassing dwellings ranging from historic workers' cottages, to original villas, to new townhouses and multi-unit apartments; from social housing to multi-million dollar private homes; and short- and long-term rental accommodation. Residents include families, young people, workers from a variety of occupations and retirees. Many have lived here for over 30 years.

### Preparation of this submission

This submission, together with prior public feedback sought by the Christchurch City Council, was prepared by a team of four VNA members, formed in April 2022 and coordinated by Geoff Banks.

## Topic 10: Consultation Approach

### 1. Background

“A district plan is a document prepared under the Resource Management Act 1991 in conjunction with the community. “

### 2. Commentary

The ability for the community (general public) to be able to provide relevant and meaningful feedback in the consultation process for the proposed plan change 14 is flawed and not democratic for the following reasons:

- The public are not technically able to understand complex, specialised reports and to then meaningfully interpret what the proposed changes mean for them, therefore are not able to be in a position to provide solid feedback in the process of notifying PC14. The interactive map is used by Council as the key information for members of the public but this does not provide sufficient information for people to understand the impact on their economic, social and environmental wellbeing.
- There has not been enough time (6 weeks) for the public to be able to gather support and materials to suitably inform others of the implications of these proposed changes given the complexity and size of the reports provided by Council. There are well over a thousand pages to read and understand, and at times the information is conflicting, which requires technical expertise to fully comprehend. The timeframe of 6 weeks to be able to read, understand, gather input, synthesis and communicate to others is neither fair nor reasonable to be considered democratic.
- The public do not have a fair voice in the process of “consultation” that is in keeping with the social, economic and environmental wide-reaching impact that PC14 has on current residents’ lives, wealth, and the broader community well-being, there are no independent reports that clearly articulates these impacts and advocate for the current residents of Christchurch (CHC).
- Developers are at significant advantage to be able to gather and respond appropriately to this proposed plan change PC14 vs members of the public, again demonstrating that the “consultation” process is unfairly weighted against the public, who also make up the vast majority of stakeholders affected in these proposed plan changes.
- There is no social impact report available and no intention of undertaking one by Council. Not having this available for residents to be able to understand how these proposed plan changes will affect them is in polite terms enabling a lack of transparency. Council have gone to great efforts to provide economic reports on building heights to support their proposed plan but have not commissioned social impact reports claiming a lack of time. It’s noted that an economic report can be commissioned in time but not a social impact report, and this economic report hinted that there are significant costs of enabling height which include increased crime, congestion and vagrancy. It is also indicated in the Council’s commentary in Section 32 Appendix 34 Sunlight Qualifying Matter that access to sunlight is important for mental health, and yet for most residents PC14 will have a direct impact on access to sunlight unless existing recession plains are maintained. The public are unaware of the impact of these planning rule changes.

### **3. Decisions sought:**

1. The consultation period is reset and given at least 9 months for the public to be able to provide submissions that the Council can use to enable well considered feedback, and for the voice of residents to be fairly and equitably represented.
2. The public are given a team of full-time experts and access to specialists paid for by the Government that represent the people of Christchurch. This is to enable and ensure a meaningful, and most importantly balanced conversation is had between both parties. Currently the CCC can use ratepayer money to commission expert reports that favour the brief that Council have given and the outcome that the Government want.
3. We want an independent social impact report where community representatives get to participate in the brief.

Without the above the process of “consultation” the current scope makes a mockery of our democracy as well as disables the CCC from representing the voice of its ratepayers – which is the primary function of the CCC.