

Subject: Fwd: Response to CCC on the Matter of the status of the Greater Christchurch Spatial Plan with Respect to PC 14
Sent: 23/04/2024, 2:20:18 pm
From: Broughton, Helen<Helen.Broughton@ccc.govt.nz>
To: IHP Info

Our Board appreciates the opportunity to provide a response on this matter.
We note the Christchurch City Council's response to Minute 13.

We have read the legal status of the Spatial Plan in the Council Memorandum of 15 April.

Please note our Board submitted to the Spatial Plan and have attached our original submission. We also presented before the Hearings Panel in person on the Spatial Plan.
The Spatial Plan had little public promotion or attention.

While Our Board supports many aspects of the Spatial Plan our concern rests with densities in Riccarton. The densities in Riccarton vary from those in Papanui. Up to this point the two areas have had the same level of density as in Plan Change 14. Riccarton in the Spatial Plan has a much higher density level than Papanui.

As the Board stated in its original submission 2.6.

'The Projection of 70 to 150 households per hectare for Riccarton is far beyond the current medium density requirements of 30 households per hectare. At present the number of households for the current medium density areas is 75 households per hectare. The Board believes the aim should be for Riccarton as per Papanui 50 to 100 households per hectare.'

There originally seemed no reason for the higher Riccarton density. However it does appear now in 5.5 that the University Of Canterbury is the reason for the higher density. In Direction 5.5 it states "Urban Growth occurs in locations and patterns that protects strategic regionally and nationally important tertiary institutes."

The Board Chair had received advice that this was an aspirational document for the future.

However it now appears that the Spatial Plan prepared under other Acts' In this case the LGA Section 83. that Panel must have regard to The Spatial plan when evaluating PC 14 pursuant to Section 74,2,b,1 of the RMA and seemingly 3.17 1 a of the NPS' 'UD.

The Board wants to bring to the attention of the Panel the lack of transparency or public engagement re the process.

- Not many public aware of the Spatial Plan.
- It was not presented to the Community Board in a briefing.
- While Our Board made a submission- it seemed the Panel's deliberations were not public. I did try to attend and recall being told they were not open to the public.
- There was only one Christchurch City councillor on the Panel.
- Panel Members may not have been aware of Plan Change 14.
- Only in reading the Spatial Plan carefully would any resident be aware of the sudden shift between Riccarton and Papanui densities, this was not highlighted.
- The process appeared very fast appearing in June 2023 and in hindsight was driven to influence Plan Change 14.
- Adoption by Council of Spatial Plan, March 2023.

Our Board requests that the Plan not be given formal status at this point.

At the very least there should be further consultation with Riccarton residents before inserting into Plan Change 14. Many residents, who are at some distance from commercial centres, will not be aware they could be affected by medium or high rise densities through the Spatial Plan.

This is exceedingly concerning and appears against the spirit of Section 83 of the Local Government Act. To my knowledge there was no active media campaign, I became aware of the Spatial Plan from a Councillor attending a briefing, and certainly I was informed the Spatial Plan was not a legally binding document. Plan Change 14 in contrast received a lot of promotion.

Thank you for the opportunity to submit. I am available for further comment.

Warm Regards
Helen Broughton
Board Chair of
Halswell Hornby Riccarton Community Board
RMA Commissioner

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Subject: Fwd: Spatial Plan
Sent: 23/04/2024, 2:26:08 pm
From: Broughton, Helen<Helen.Broughton@ccc.govt.nz>
To: IHP Info
Attachments: [Submission. Greater Christchurch Spatial plan docx.docx](#)

Kia Ora. Please find our submission to the Spatial Plan Hearings Panel. You will note my understanding in March this year that I considered it not to be a "binding document"

Regards
Helen

Helen Broughton
Board Chair of
Halswell Hornby Riccarton Community Board
RMA Commissioner
Cell [027 6404935](tel:0276404935)

From: Broughton, Helen <Helen.Broughton@ccc.govt.nz>
Sent: Monday, March 11, 2024 3:31 PM
To: Tina Law > _____
Subject: Fwd: Spatial Plan

Re Spatial Plan

Largely supportive but concerned that density for Riccarton is going beyond density for Papanui. In the District Plan [Plan Change14} the two areas have same levels of density.

In the Spatial Plan Papanui is 50 to 100 households per hectare and Riccarton 70 to 150 household per hectare.

Fortunately this is not a binding document .

Most Riccarton people will be completely unaware of this dramatic change. It appears on one page only and has not been advertised. To pick this up you need to be treading the fine print of the document.

Please phone me if any further questions.

Regards
Helen

Helen Broughton
Board Chair of
Halswell Hornby Riccarton Community Board
RMA Commissioner

SUBMISSION TO: Whakawhanake Kāinga Komiti
ON: The Greater Christchurch Spatial Plan
BY: Waipuna Halswell-Hornby-Riccarton Community Board
CONTACT: Faye Collins
Community Board Adviser

1. INTRODUCTION

- 1.1. The Waipuna Halswell-Hornby-Riccarton Community Board (“the Board”) appreciates the opportunity to make a submission on The Greater Christchurch Spatial Plan (“the Plan”).
- 1.2. The Board wishes to be heard in support of its submission.

2. SUBMISSION

- 2.1. The Board understands from the maps in the Plan that the strategy was to connect Christchurch City with Rolleston and Rangiora. This appears a sensible objective, but the Board is concerned that the end destination is not Rolleston or Rangiora.
- 2.2. The Board is concerned that there appears no mass transit system to the East, Woolston, Linwood. The Board considers this remiss and this lack of development features as well in the Christchurch City Council’s Proposed Plan Change 14. This is likely to leave these suburbs to either become positively tranquil or decline.
- 2.3. The Board considers that it needs to be recognised that Christchurch City is not growing at present, however Selwyn and Waimakariri are growing. The Board questions the Plan’s growth projections for Christchurch City. Please refer to report by Mike Blackburn attached. (This was also referred to The Hearings Panel for Plan Change 14). The Board understand from mathematicians that it is difficult to model 60 years out with any accuracy and considers that the lack of accuracy needs to be stated.
- 2.4. The Board supports Mana Whenua priorities and expectations.
- 2.5. The Board supports the Christchurch Central City being the primary centre for Greater Christchurch, however, the Board does not agree that Papanui/Riccarton should be incentivised through planning. The Board considers that, through past poor planning decisions, Riccarton is situated very close to the central city and, in fact, competes with the

central city for retail and housing and that the more intensified housing is encouraged in Riccarton, the more the central city will decline.

- 2.6. The projection of 70 to 150 households per hectare for Riccarton is far beyond the current medium density requirements of 30 Households per hectare. At present the number of households for the current medium density areas is 75 households per hectare. The Board believes that the aim should be for Riccarton as per Papanui 50 to 100 households per hectare.
- 2.7. The Board supports a Mass Rapid Transit System provided it runs on separate tracks. The Board Chairperson was a Councillor on the Christchurch City Council between 2001- 2013 under Mayor Bob Parker, when a study was undertaken to look at a light rail system between the Central City and the University of Canterbury. Once the costings were done, they were so high any further discussion was abandoned. The Board considers that a Mass Rapid Transit system is very worthwhile provided it has its own track and does not involve the use of current large buses which have very low patronage.
- 2.8. It is important to look at the reality of six or three storied housing development. The Board suggests that generally the images portrayed look better than it is likely to be in reality (e.g. images on Page 41). Attached as an example are two schematic drawings of what three and six storeys will look like done by WSP in a report to Council for District Plan Change 14. The Board is concerned that overseas where intensification has occurred there are very few trees and large concrete blocks developments.
- 2.9. The Board supports the concept of a Green Belt. The Board has indicated concerns regarding the level of intensification proposed in Plan Change 14, but supports the green belt to protect soils. The Board's view is that Christchurch has sufficient land supply until 2050 even with current levels of intensification. One does not have to choose between intensification and a green belt, even with current levels of intensification.
- 2.10. The Board supports Opportunity 1 to protect, restore and enhance historic heritage and sites and areas of significance to Māori, and provide for people's physical and spiritual connection to these places. It needs to be noted, in context the importance of including existing heritage buildings and those to be included through Christchurch City Council's District Plan Change 14 for the City and other territorial authorities.

- 2.11. The Board supports Opportunity 2 to reduce and manage risks so that people and communities are resilient to the impact of natural hazards and climate change.
- 2.12. The Board supports Opportunity 3 to Protect, restore and enhance the natural environment, with particular focus on te ao Māori, the enhancement of biodiversity, the connectivity between natural areas and accessibility for people.
- 2.13. While the Board generally supports Opportunity 4 to Enable diverse and affordable housing in locations that support thriving neighbourhoods that provide for people's day-to-day needs, it cautions that existing communities should not be destroyed. To put this in context. The National Policy Statement on Urban Development should not be portrayed as positive. Councils should be neutral on this or leave it out. The Board is aware that many residents are angered by Central government interfering in Christchurch. Councillors were generally against Plan Change 14 when adopted- only four of seventeen speaking positively in favour.
- 2.14. The Board supports enabling the prosperous development of kāinga nohoanga on Māori Reserve Land, supported by infrastructure and improved accessibility to transport networks and services; along with the development of kāinga nohoanga within urban areas.
- 2.15. The Board supports ensure sufficient development capacity is provided or planned for to meet demand.
- 2.16. The Board supports the concept that the projected demand for housing over the next 30 years is not a major issue for Greater Christchurch but does not accept one can project to 60 years. The Board accepts, however, that a reasonably conservative view has been taken- i.e. the understanding that a 60 year plan is based on housing remaining reasonably constant over time.
- 2.17. With reference to 4.3, the Board considers that growth needs to be factored in to Rolleston and Rangiora. With reference to Figure 11 the Board is unclear clear why Riccarton and Hornby have higher density than Papanui as both are on a major transport corridors. There may be a technical error in the numbers over the "walkup apartment". The apartment block shown has not been viewed positively by residents.

- 2.18. The Board considers the 4.5 goal to deliver thriving neighbourhoods with quality developments and supporting community infrastructure including Vibrant Communities with Access to Services is a worthwhile goal but the reality likely to be different. The area represented by Central Riccarton Residents' Association has been zoned medium density for approximately 30 years. It has not worked in terms of social connectedness. The area largely has a more transient population and has lost greenspace. It is congested, with cars parking on footpaths and Council berms. The Board suggests the Panel walks around this area to see the effects of the current medium density provisions.
- 2.19. In terms of Community facilities and open, green and public spaces the Board considers it is difficult to see how an existing area can be intensified and open space created. This is much more easily achieved in new developments. The risk is that intensification will occur with no further outdoor space being provided, which will increase social deprivation, isolation and at-risk young people.
- 2.20. Regarding 5.3 the Provision of strategic infrastructure that is resilient, efficient and meets the needs of a modern society and economy, the Board comments that there must be provision of appropriate infrastructure before any development occurs. It should indicated that infrastructure, planning, and funding must precede actual intensification.
- 2.21. The Board recognises that Opportunity 6: to Prioritise sustainable transport choices to move people and goods in a way that significantly reduces greenhouse gas emissions and enables access to social, cultural, and economic opportunities incorporates a goal to shift how people travel. The Board sees this an aspirational goal which will be difficult to realise given that even in current medium density areas many people (including young workers and students) use cars for work/sport/entertainment etc.

3. CONCLUSION

- 3.1. The Board requests that the Whakawhanake Kāinga Komiti takes into consideration the above submission on The Greater Christchurch Spatial Plan and in particular request that:
- That infrastructure and future greenspaces are in place before any intensification.
 - There is further consideration of the current rail network.
 - That Riccarton and Papanui should be similar in terms of intensification.

- That clarification is required as to why Rolleston and Rangiora cannot be included.

3.2. While the Board acknowledges that the Plan is an aspirational document it is concerned that it was not consulted/briefed at an earlier stage. Residents in the Board area are generally against the intensification proposed in Plan Change 14 and the Plan takes intensification to another stage.

3.3. The Board wishes to be heard in support of its submission.



Helen Broughton
Chairperson Waipuna Halswell-Hornby-Riccarton Community Board

Dated 2023.