

Before the Independent Hearing Panel
Appointed by the Christchurch City Council

Under The Resource Management Act 1991

In the matter of Plan Change 14 (Housing and Business Choice) to the
Christchurch District Plan

Cashmere Park Limited, Hartward Investment Trust and
Robert Brown

Submitter ID: 593

Summary Statement of Bryan John McGillan

14 November 2023

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**anderson
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Introduction

- 1 Tēnā koutou my full name is Bryan John McGillan. I would like to acknowledge Te Ngai Tuahuriri as kaitiaki and that we are within their rohe and that this area is also shared with Taumutu.
- 2 I provided a statement of evidence¹ in support of the relief sought by Cashmere Park Limited, Hartward Investment Trust and Robert Brown (**the Submitters**), seeking rezoning of land located within the Henderson East Outline Development Plan area in Hoon Hay² (**the Site**) from Residential New Neighbourhood (**RNN**) and Rural Urban Fringe (**RUUF**) zones to Medium Density Residential Zone (**MDR**).
- 3 My qualifications and experience are set out in in my evidence in chief.
- 4 I confirm that I have read the Code of Conduct for expert witnesses contained in the Environment Court of New Zealand Practice Note 2023 and that I have complied with it when preparing my evidence.
- 5 The purpose of this Summary Statement is to provide a brief summary of my evidence and to respond to the rebuttal evidence of Ian Bayliss, dated 9 October 2023.

Summary

- 6 The Submitters propose rezoning the entire Site to MDR. This is an appropriate zoning for the current RNN which is infrastructure ready and the rezoning of the current adjacent RUUF areas to MDR, will achieve a high quality well functioning outcome to meet the objectives of the NPS-UD, Medium Density Residential Standards (**MDRS**) and PC14.
- 7 The proposed urban intensification of the Site is not unanticipated due to the extensive history that has looked to achieve that result. It is consistent with proposed PC14 objective 3.3.7 which seeks a well functioning urban environment.

¹ Evidence of Bryan McGillan dated 20 September 2023.

² 126 Sparks Road (Lot 1 DP 412488); 17 Northaw Street (Lot 2 DP 412488); 36 Leistrella Road (Lot 3 DP 412488); 240 Cashmere Road (Lot 23 DP 3217); 236 Cashmere Road (RS 41613); 200 Cashmere Road (Lot 1 DP 547021).

- 8 The planning assessment demonstrates that the rezoning gives effect to all relevant provisions, except where limited to Map A of the Canterbury Regional Policy Statement (**RPS**). In all other respects, the proposal provides for the consolidated, logical, integrated provision of growth for the Greater Christchurch area, and provides housing choice and certainty.
- 9 The existing environment and unique factors of the Site distinguish it from other areas.
- 10 Any potential flood matters can be resolved and I understand that there is agreement amongst Christchurch City Council and Eliot Sinclair engineers on this matter.
- 11 In the case of this Site, the rezoning of the land to residential would provide for a residential development in close proximity to the Hoon Hay suburb as well as having excellent transport links to Central Christchurch. The efficient location of the Site has good transport links to existing employment hubs of surrounding suburbs which includes Hoon Hay, Hillmorton, Cashmere, Halswell as well as bigger hubs of Prebbleton and Christchurch.
- 12 The proposed residential growth will be managed through the proposed Outline Development Plan (**ODP**) which ensures that there is adequate vehicle and pedestrian access throughout the site and development. The ODP area adjoins existing residential areas to the east which will allow the expansion of the Hoon Hay suburb.

The Rebuttal evidence of Mr Bayliss

- 13 Mr Bayliss confirms he largely agrees with my assessment against the planning framework and key matters to consider. My Bayliss states:³

I agree with the suitability of the location for urban development in relation to relevant strategic objectives policies and that urban intensification of this area has been anticipated for a long time, with the key impediments to intensification having been extensively addressed with a draft Outline Development Plan addressed by the evidence of Jade McFarlane, flood modelling evidence from Greg Whyte, Transport modelling evidence from

³ Rebuttal evidence of Ian Bayliss at [23].

Andrew Leckie, Geotech evidence from Nicholas Traylen, Economics evidence from Natalie Hampson together covering key informational requirements.

14 However, Mr Bayliss goes on to say:⁴

I am still concerned that the PC14 process does not provide a suitable framework for confirming the proposed rezoning and draft ODP. At the time of writing this rebuttal, more time is needed than the short window available for a range of specialist experts to test the information provided and confirm if it is comprehensive and robust and whether changes or further information is needed.

15 In response to Mr Bayliss's concerns, I consider that the proposal has been refined through the Joint Witness Statement: Urban Design, with the ability for experts to conference further as the Panel directs.

16 I consider that the entire Site is ready for rezoning now and that a deferred zoning of FUZ is not appropriate. The RNN portion of the Site is infrastructure ready and no further assessment is required to confirm the suitability of residential use. Staged development is progressing through the RNN zone. For these reasons, the RNN area should be identified as a relevant residential zone and the MDRS applied. FUZ is not appropriate given the extensive expert assessments that confirm the Site can provide for a well functioning urban environment, in accordance with the overall objective of the NPS-UD. Contingent upon achieving that outcome is the rezoning of the current RUUF land to the north and south.

17 The RUUF areas of the site are effectively islands surrounded by residential development on three sides and bisected currently by residential zoned land. From a development and connectivity perspective, rezoning these islands is considered a necessary and appropriate outcome, meeting the purpose of PC14 (and the MDRS) to enable housing capacity and choice.

18 In response to Mr Bayliss's comment at paragraph 25 of his rebuttal, my assessment of RPS was included as part of the submission on PC14. In short, while the entire Site is not located within a Greenfield Priority Area or Future Development Area, the RPS is out of date. The RPS pre-dates the NPS-UD, and the Map A approach does not achieve the NPS-UD direction for responsive planning to provide sufficient capacity for residential development.

⁴ Rebuttal evidence of Ian Bayliss at [24].

- 19 Mr Bayliss acknowledges that this proposal is "...somewhat distinct from other greenfield rezoning proposals in that the location actually sits within the existing urban environment." I consider this a significant comment and that the Site is unique which sufficiently separates this proposal from others and that support of the rezoning would not set a general precedent.
- 20 I remain confident that the rezoning, particularly with the inclusion of an ODP, gives effect to the objectives and policies of the NPS-UD.⁵ This rezoning provides an opportunity to consolidate residential development, providing high quality comprehensive design, responding to a need for affordable housing in Christchurch. This goes to the heart of the MDRS.

Dated this 14th day of November 2023

BJ McGillan

Bryan John McGillan

⁵ In particular Objective 1 NPS-UD 2020; Objective 6 and Policy 8 NPS-UD 2020.