

NOVEMBER 8TH, 2023

BEFORE THE CHRISTCHURCH CITY COUNCIL APPOINTED  
PLAN CHANGE 14 INDEPENDENT HEARINGS PANEL

Cindy Robinson – Chair

David McMahon - Deputy Chair

Karen Coutts

Alan Matheson

Ian Munro

STATEMENT BY TONY SIMONS IN SUPPORT OF THE SUBMISSION FROM  
RICCARTON BUSH KILMARNOCK RESIDENTS’ ASSOCIATION (Submitter #188)

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# 1 INTRODUCTION

2 Kia ora koutou.

3 Ko Tony Simons taku ingoa, no Ōtautahi Tūrangawaewae.

4 Thank you for the opportunity to speak to you today.

5 And thank you to my wife Christine who has been forced to put up  
6 with me devoting hundreds of hours of work fighting this planning  
7 disaster in the making.

8 Without too much confidence, I'll start with what we would like to  
9 see happen.

10 PC14 is not green. It is not worth recycling. We'd like it placed in  
11 the red bin.

12 Basically, we have struggled to understand why we are doing this;  
13 trying to deal with the requirements of the RMA alongside the  
14 hastily drafted Amendment Act and our operative District Plan, for  
15 no reasonably foreseeable benefits for our city, over what density  
16 is enabled already<sup>1</sup>.

17 Residents, the most affected, have had nowhere near adequate  
18 resources to fight this alongside a few large submitters who seem  
19 to have the ear of city council staff and will have spent millions of  
20 dollars<sup>2</sup>, much of it public money, advancing their own interests by  
21 the time this ends.

22 However, we are realistic and, accepting you may not agree to bin

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<sup>1</sup> NPS-UD Clause 3.2 states every local authority must provide sufficient development capacity to meet expected demand for housing that is reasonably expected to be realised in the long term - defined as 10-30 years

<sup>2</sup> Kāinga Ora has spent \$800,000 hiring lawyers, planners and architects to influence the outcome of the Wellington District Plan - <https://wellington.scoop.co.nz/?p=153778>

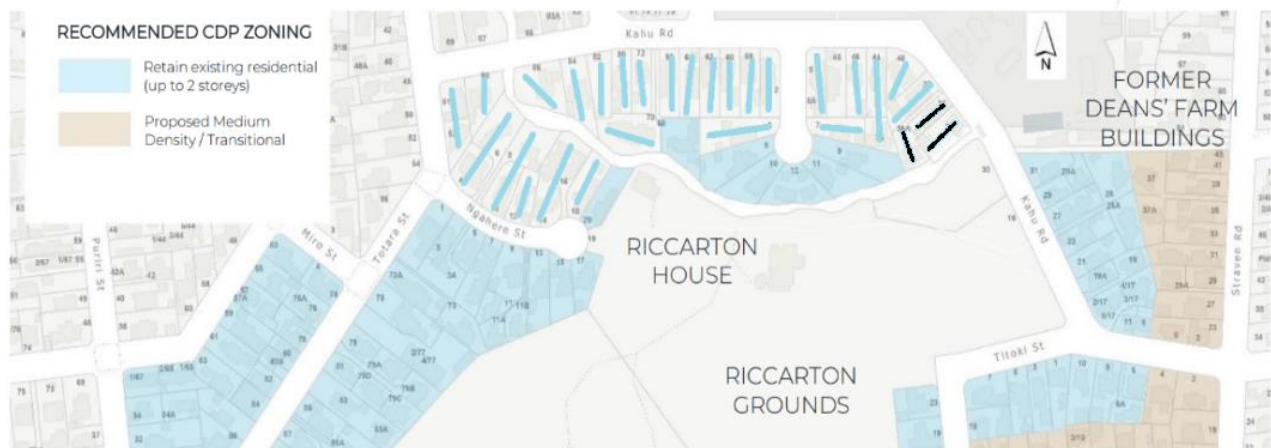
23 this plan, we will speak to some issues raised in our submission,  
24 particularly in areas where the ground has shifted since  
25 notification.

## 26 ON THE RBIA QUALIFYING MATTER

27 To start, we support the Qualifying Matters, particularly the  
28 protections for Pūtarikamotu - Riccarton Bush and the wider area  
29 surrounding this taonga, including additional protections  
30 recommended since notification.

31 However, we do reiterate our call to extend the Riccarton Bush  
32 Interface Area (RBIA) to include sites north of the bush and grounds  
33 encompassed by Kahu Rd, Totara St, Ngahere St and the Avon River  
34 (marked with a stripe below).

35 The criteria for inclusion match the ‘view shafts and aspects of the  
36 bush’ criteria used for including other areas, and we note council  
37 staff have already supported adding three sites at the east end<sup>3</sup>.



38 We are also astonished at a recommendation that the Riccarton  
39 Bush Interface should be scrapped altogether if the Panel accepts

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<sup>3</sup> Clause 7.1.13 of Ike Kleynbos' report under S42A, dated 11 August.

40 the Airport Noise Influence Area (ANIA) being extended<sup>4</sup>. City  
41 planner Ike Kleynbos' argues that the bush area will be protected if  
42 the noise zone is extended, so the RBIA would no longer needed.

43 We strongly submit the RBIA must remain. It would be totally  
44 unacceptable for ongoing protections afforded to Pūtārikamotu to  
45 be dependent on an unrelated Qualifying Matter.

## 46 OUR PLAN FOR CHRISTCHURCH

47 *[Earthquake slide2]*

48 After the worst of the 2011 earthquakes were over, we started to  
49 think about our vision for a new Otautahi-Christchurch.

50 In late 2011 'Share an Idea' was launched and it collected 106,000  
51 ideas from local people. It won an international award for diligent  
52 community engagement<sup>5</sup>.

53 *[Share an idea slide3]*

54 What followed took years of careful thought. Finally, in 2015 we  
55 had a replacement city plan providing for a compact city pedestrian  
56 friendly city with low-rise buildings, green spaces, sunny laneways  
57 and cycleways.

58 You can say what you like about what has changed since, but that  
59 vision is still alive. We have never renounced it.

60 Last week we read that Christchurch is in the top 10 of world cities  
61 people would most like to move to, the only New Zealand city to

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<sup>4</sup> Clause 7.1.36 of Ike Kleynbos' report under S42A, dated 11 August.

<sup>5</sup> 2013 Treinnale for an Architecture of Necessity by Sweden's Virserum Art Museum - <https://www.stuff.co.nz/the-press/news/city-centre/8882340/International-award-for-Share-An-Idea>

62 make the list<sup>6</sup> and equal with Vienna and Portland.

63 In fact, in the last two years, our city has attracted numerous  
64 international accolades for being a great place to visit or to live,  
65 and I assure you that is not due to the promise of PC14.

66 Ride on the trams and you'll hear the drivers boasting about our  
67 post-earthquake cityscape. Talk to visitors and you'll hear them  
68 congratulating us on our vision.

69 As far as meeting housing demand is concerned, we are already  
70 enabling and encouraging intensification.

71 In the last two years Canterbury councils have approved more new  
72 homes than ever and, in proportion to our population, more than  
73 any other region in New Zealand;<sup>7</sup> and two thirds of them have  
74 been attached townhouses or apartments.

75 A check this morning shows 400 studio or one or two bedroomed  
76 apartments and townhouses in Christchurch city for sale on  
77 TradeMe Property,<sup>8</sup> nearly twice as many as Auckland based on  
78 population.

79 There is no housing supply crisis here and certainly no need for  
80 high-rise density in the suburbs, and yet our long-term vision for  
81 this city is simply being ignored.

82 The NPD-UD and PC14 have been forced on us, without our  
83 consent.

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<sup>6</sup> <https://www.stuff.co.nz/travel/destinations/nz/canterbury/301001842/christchurch-named-among-worlds-top-10-cities-people-want-to-move-to>

<sup>7</sup> <https://www.stats.govt.nz/news/home-consents-remain-high-as-canterbury-hits-new-record/>

<https://www.thepress.co.nz/nz-news/350101915/canterbury-home-building-highest-nz>

<sup>8</sup> <https://tinyurl.com/TMPbedroomsmax2>

84    **OUR PETITION**

85        *[RBK map slide4]*

86        Riccarton is heavily impacted by this plan change. Our area, but  
87        also the nearby Deans Avenue precinct and those living south of  
88        Riccarton Rd, face the prospect of having communities eviscerated.

89        It has caused a huge amount of stress.

90        Given Christopher Luxon has admitted that partnering with Labour  
91        over the NPS-UD was probably a mistake<sup>9</sup> and National plans to  
92        introduce legislation that will give the council the freedom to reject  
93        this plan change<sup>10</sup>, we submit no more public money should be  
94        spent on a process certain to be affected by new policy direction  
95        and a likely city council reconsideration.

96        Seven weeks ago, we launched an online petition expressing  
97        concerns about the impact of PC14, on Riccarton specifically, but  
98        on the rest of the city as well.

99        As of this morning, it had attracted more than 1,063 signatures and  
100       it is still going<sup>11</sup>. *[There were too many pages to print but we have sent you*  
101       *the list, including comments, received to date.]*

102       We submit this is solid anecdotal evidence of widespread  
103       opposition to the anticipated effects of this plan change and  
104       support for an adjournment of this process.

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<sup>9</sup> National leader Christopher Luxon says his party was “wrong” when it joined the Government for a bi-partisan commitment to greater housing intensification - <https://www.nzherald.co.nz/nz/politics/housing-density-national-party-leader-christopher-luxon-will-change-rules-greenfields-development-favoured/U62YB2BGAJD5JGLACUQMAEUNGY/>

<sup>10</sup> Hamish Campbell, MP, Ilam – personal communication

<sup>11</sup> <https://www.change.org/StopPlanChange14>

105 **RICCARTON MALL MISTAKE**

106 *[Mall site slide5]*

107 60 years ago, the Riccarton Borough Council, decided to establish  
108 the city's first shopping mall in our historic area of Christchurch,  
109 very close to the CBD.

110 The slide shows the foundations being laid in a residential area one  
111 block from Riccarton Bush across the road from a few existing  
112 shops on the north side of Riccarton Rd.

113 The location was a mistake.

114 By the time local authorities unified in 1989 it was clear the mall  
115 was competing aggressively with the CBD less than three  
116 kilometres away<sup>12</sup>.

117 By the early 2000s it occupied the entire block, and the one next to  
118 it, and still little was done to curtail its growth.

119 Then 2011 came, earthquakes crippled the city centre, and the mall  
120 became the de facto CBD.

121 Now the area is proposed to be designated a Large Town, which  
122 does nothing to lessen that status.

123 Increased primacy for Riccarton means it can grow even more,  
124 cannibalising a CBD still trying to attract residents back.

125 *[Centres slide6]*

126 Earlier in these hearings, city planner Mr Kirk Lightbody was asked

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<sup>12</sup> Riccarton Mall/Westfield competes directly with the central city – Riccarton Centre Factsheet, CCC, 2017 - <https://drive.google.com/file/d/17TXBtNMqZej8fulgLX1N4hQFqPJ59xGk/view?usp=sharing>

127 by Commissioner Munro ... “in deciding how centres should be  
128 classified, to what extent was the council mindful of how they  
129 might compete against each other?”

130 His response was interesting. He simply acknowledged that they  
131 fight amongst themselves. The implication was that city planners  
132 are OK with that.

133 We think Riccarton centre should be designated a Large Local  
134 Centre at most; constrained to support the CBD, not compete with  
135 it; more like Sydenham or Merivale, both of which sit a similar  
136 distance out.

137 *[Picton Ave slide7]*

138 That is why we would like to see the existing height limits in  
139 Riccarton centre retained at 20m and the eastern boundary of the  
140 commercial area set at Picton Avenue.

## 141 EAST OF STRAVEN RD

142 The NPS-UD appears to have imposed a densification ideology  
143 mandating the maximum density possible, giving property  
144 developers licence to pepper-pot high-rise buildings all over our  
145 suburbs.

146 We worry it will only deliver an ugly dysfunctional city and city  
147 council staff seemed to support that when they said, in their S32  
148 evaluation report, that increased enablement is not needed in  
149 Christchurch and is unlikely to improve housing affordability.<sup>13</sup>

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<sup>13</sup> Christchurch District Plan Change 14 Section 32 Evaluation – Clause 3.2.11  
<https://ccc.govt.nz/assets/Documents/Consultation/2022/09-September/S32-Part-1-Overview-and-High-Level-District-Issues-FINAL.PDF>





Image of a six storey apartment building, north of Riccarton Rd, permitted under the notified PC14

150 Between Straven Rd and Mona Vale six storeys was notified but  
151 now eight or nine storeys is being recommended.

152 *[Matai St slide8]*

153 This slide on screen shows the view east down Matai Street West.  
154 The photo to the right gives an idea of what 28 metres might allow,  
155 and the impact it could have.

156 We submitted strongly this area should be left residential and  
157 medium density at the eastern end and yet, in the last six months,  
158 proposed residential heights have gone from two or three storeys  
159 permitted, to 20 metres (notified) then to 28 metres  
160 recommended.

## 161 ZONING RESPONSE TO THE ANIA

162 *[ANIA Zone slide9]*

163 In this slide you can see where 28m is proposed. This is the city  
164 council's recommended zoning response to the proposed Airport  
165 Noise Influence Area (ANIA) Qualifying Matter.

166 The black dashed line is the proposed outer noise contour.

167 The green area is currently residential suburban or medium  
168 density, but earmarked for 8 or 9 storeys despite the area north of  
169 Riccarton Rd being under the contour.

170 In his evidence city council planner, Ike Kleynbos said he wanted  
171 the green area intensified further as compensation<sup>14</sup>; partly  
172 because the other residential parts of Riccarton are not being  
173 densified, because they fall under that same noise contour.

174 We are confused.

175 We've looked at Clause 3.33 of the NPS-UD outlining the  
176 requirements if a qualifying matter applies that would limit  
177 capacity. There is nothing to say intensification needs to be  
178 increased in one area to compensate for less-density somewhere  
179 else<sup>15</sup>.

180 If there was, we might expect to see massive increased enablement  
181 all over the city to compensate for the other Qualifying Matters  
182 proposed - but we don't.

183 The airport's evidence also argues that, under the entire contour,  
184 reduced density of residential development is required to meet the  
185 need for a well-functioning urban environment.

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<sup>14</sup> Ike Kleynbos August 2023 evidence at 6.1.91 - "I... consider that any 'compensatory intensification' around the Riccarton Centre as a result of the updated ANIA should be located in these areas (shown in bright teal, with all other MRZ and HRZ zoning as notified".

<sup>15</sup> National Policy Statement on Urban Development 2020 - Clause 3.33, p27  
<https://environment.govt.nz/assets/publications/National-Policy-Statement-Urban-Development-2020-11May2022-v2.pdf>

186 **INAPPROPRIATE PROPORTIONATE RESPONSE**

187 On a broader front, the staff recommendation to increase heights  
188 around differently-designated centres in Christchurch also seems to  
189 have been influenced by a few large submitters arguing that  
190 proportionality was lacking in the notified version of the plan.

191 But council could **reduce** heights around centres to achieve  
192 proportionality, without in any way compromising future capacity  
193 to meet demand.

194 At a September meeting with council planning managers, we asked  
195 why this was not considered. They suggested we raise it with you  
196 today, so we have.

197 **WALKING CATCHMENTS**

198 PC14 also plays fast and loose with walking catchments, which even  
199 council staff seem to struggle to define. Is it time or is it distance?  
200 Is it both? Are catchments defined to respond to activities in  
201 commercial zones, or what activities there may be in the future, or  
202 are they just lines on a map?

203 The proposed catchment around the Riccarton centre was to be  
204 600 metres, then 800 metres but has, since notification, morphed  
205 into a much larger area, well over a kilometre in some directions;  
206 but that is measured from the edge of the area, not the centre.

207 Given off-street parking is no longer required anywhere, these  
208 walking catchments should at least be tested, not just drawn on a  
209 desktop and adjusted to fit someone's preconceptions.

210 *[Walking slide10]*

211 Our submission shows that an able person living 800 metres from

212 the proposed Riccarton centre boundary faces a 40-minute walk to  
213 the supermarket at Westfield Mall, and back again.

214 Walking times should be calculated to the places people want to  
215 walk to, and should take account of what our less-able citizens can  
216 manage, not the average person.

217 To do otherwise ignores the walking capability of nearly half our  
218 population and will ensure these precincts attract a non-diverse  
219 population - only those who can walk to the shops or afford to have  
220 their groceries delivered.

## 221 THE SOCIAL IMPACTS OF A PARADIGM SHIFT

222 Last week, speaking to this panel, Mr Kleynbos described PC14 as a  
223 paradigm shift for the city.

224 Yet here we are knocking it out in less than a year under a so-called  
225 streamlined process imposed by the government, with no right of  
226 appeal except on points of law related to a law we struggle to  
227 comprehend.

228 This plan change, of all plan changes, should have taken time and  
229 should have been informed by original research, relevant to  
230 Christchurch; and good urban design practice to verify (or  
231 otherwise) the academic theories that preach the benefits of  
232 suburban densification and key activity centres.

233 We do not accept that the city council has had the time to  
234 adequately assess the social, environmental or health impacts,  
235 particularly for disadvantaged or vulnerable communities.

236 In other words, we don't think the S32 report contains a level of  
237 detail corresponding to the significance of the effects on

238 Christchurch, as it is required to do under the Act, particularly if, as  
239 Mr Kleynbos said, this is a paradigm shift. It also played no part in  
240 informing this plan change because it was delivered too late.

241 A proper just-in-time assessment would have revealed the worry,  
242 confusion and fear from affected communities that you have  
243 already witnessed at these hearings.

244 Simply the threat of PC14 has caused real mental health impacts in  
245 communities already beset with health problems.

246 A thorough report might also have concluded that social  
247 engineering - forcing people to walk by rejecting cars, removing  
248 parking and then promoting high-density high-rise - is not positive  
249 policy as recent international research has shown<sup>16</sup>.

250 Residents will leave the city heading to Selwyn or Waimakariri,  
251 placing even more pressure on green-fields.

252 Some have contacted us saying they no longer have the stomach  
253 for this because there's no point fighting city hall; or worse,  
254 because our society is becoming increasingly intolerant of others'  
255 views, they are afraid of being labelled NIMBYs.

256 What is to stop heavily-densified suburban areas becoming mono-  
257 cultural enclaves devoid of seniors or whanau with children –  
258 populated by singles or groups of singles or couples; or worse,

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<sup>16</sup> Risser, Ralf & Sucha, Matus. (2020). Psychological Perspectives on Walking:  
Interventions for Achieving Change.

*We should not have to walk – we should love to walk. People should not look at walking as something that 'you have to do'. The authors of this book believe walking should be perceived as rewarding and as something that is effective, efficient, and clever. Renouncing car use may be a positive motivation for fundamental environmentalists, but the majority of the population needs to be reminded of the – more or less – immediate rewards provided by walking and given the opportunity to experience these [without being forced].*

259 precincts of foreign-owned Airbnb's.

260 There are signs of it already and it does not make for a well-  
261 functioning urban environment.

262 *Dixon Flats slide11.*

263 Dense high-rise residential developments built to 'good enough'  
264 standards will certainly become the slums and criminal breeding  
265 grounds of the future, like the Dixon St Flats in Wellington.

266 Like planners today, the planners of the 1950's thought they were  
267 promoting enlightened housing policies.

268 What really illustrated for us what an irresponsible and blindly  
269 excessive intensification policy is being forced on us was city  
270 council planning boss John Higgins telling us PC14 will enable  
271 enough supply to see us through the next 150 years.<sup>17</sup>

272 That's six generations away.

273 Putting that into perspective, if we look back six generations the  
274 first four ships had arrived just 20 years earlier and the Cathedral  
275 wasn't even built yet.

276 Mr Higgins explained this ridiculous excessiveness simply by saying  
277 – that's the effect of what the government has required us to do.

278 Not a good enough reason... if we must plan now for what will  
279 happen to our city in 150 years, there are much more certain  
280 outcomes we need to be preparing for first, like perhaps moving  
281 our entire city inland?

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<sup>17</sup> PC14 will give the city 158 years of housing supply, The Press, Sept 22<sup>nd</sup> 2023 - <https://tinyurl.com/tc45afph>

282 THE ANIA AND THE CPRS

283 Finally, to finish, we recently discovered that city council planner  
284 Sarah Oliver, has changed her evidence around the proposed  
285 extension of the Airport Noise Influence Area QM and the  
286 recommended zoning to respond to that.

287 It appears she is now persuaded the noise contour needs to be left  
288 to ECAN to deal with, as part of an upcoming Canterbury Regional  
289 Policy Statement (CPRS) review, and any zone change decisions  
290 should be made after that.

291 We support this matter being deferred to the CPRS, but please -  
292 **only if operative zoning is retained indefinitely, or until such time**  
293 **as it may be considered again by the next full review of the**  
294 **Christchurch District Plan.**

295 Given what we've been through, we strongly oppose any  
296 suggestion that the city council might put us through another plan  
297 change before that review is due.

298 We appeal to the panel to please make that point very strongly in  
299 its recommendations.

300 Thank you