### **Strategic Directions**

The Waipuna, Halswell, Hornby ,Riccarton Community Board made a submission on the Draft Housing and Business Choice Plan Change 14 and made further cross submissions.

Our Board is raising some broad issues that could be considered under Strategic Directions.

#### 1 Our Board has strong growth, with each ward facing slightly different issues

Halswell, the development of new subdivisions, Hornby, a growing residential sector interfacing with the industrial sector and Riccarton ,impacted by low rise intensification and now facing dramatic higher levels of intensification.

Hornby and Riccarton are severely affected by the proposed increasing densities as Riccarton and Hornby Commercial Centres are defined as large Town Centres and the Bush Inn area as a Large Local Centre. All three centres face building heights of 22 metres. This means that Riccarton faces high rise intensification from Deans Avenue to Peer Street {alongside Villa Maria } and Main South Road, merging with high rise around the Hornby Hub.

Our Board does not believe even the most pro - intensification planner saw this unremitting wall of six - possibly ten storeyed housing- from Deans Avenue to Hornby.

#### **Closeness Of Large Centres**

Christchurch is unusual in having large commercial centres close to each other and the central city. A large commercial centre such as Westfield close to the central city is unusual and has not occurred through considered planning. This decision was a result of Riccarton being disestablished as a borough in 1989. The Riccarton Borough Council passed a resolution extending the then suburban shopping centre into a major retail/commercial centre. This has drained retail from the central city.

While residents who are aware of the proposals are highly concerned, many residents are unaware of the increased height and densities for their area in the initial proposal. Many more will be unaware of the increasing heights and walking distances proposed in the Section 42a report - eg north of the Bush Inn being included for 22 metres - and increased heights in the lower Riccarton area.

### Higher Heights than Draft Proposal

Our Board draws to your attention that the heights and walking catchments are higher and wider than the initial proposal. This has occurred through the Section 42a report of Ike Kleynbos, a City Council planner.

This has meant some residents, dramatically affected by the change- are not able to make any submission before the Independent Hearings Panel. The area between Straven Road and Deans Avenue is an example which is currently residential transitional suburban density, now

potentially moving to ten storeys. This seems against "natural justice", but the Board understands that under the RMA legislation there is no possibility of further submissions.

# **Population Projections**

Our Board in our written submission has questioned the current population projections. We have tabled the Blackburn report, which indicates the population of Christchurch has been static. We have asked permission for Mr Blackburn to appear as a witness. Our Board does not understand how the population projections have changed from the draft proposal, nor do we understand how we have a different timeframe.

In the draft proposal the Council projected out 30 years as required by the National Policy Statement On Urban Development. However at a recent meeting with Council planners and Residents' Associations in Hornby and Riccarton, the Council planners said they were looking at a timeframe of 130 years. { We understand it may be 150 years . Is it legal to adjust the timeframe beyond what was initially tabled ? Many submissions may have been received if this time frame and population projection had been notified. .

It is totally unrealistic to project out so far- no one can project that time out with any accuracy. If we project back 130 years to 1893 -the date of the suffrage vote in Parliament-women wore long dresses, were largely homemakers and riding bicycles was seen as outrageous.

# **Central City**

All resident groups consider the central city should be the focus for high rise development and only then turn to the suburban areas .Certainly the Central City should be the focus for increased residential development. Expert opinion to the pre - earthquake Council was that 20,000 residents were essential for the central city to remain functional and vibrant. The Independent Hearings Panel shoud consider the retention and development of the Central City as critical. Allowing high rise development in Riccarton will restrict revitalisation of the central city.

### **Role Of Spatial Plan**

Our Board asks that you consider the role of the Spatial Plan. This is occurring concurrently with Plan Change 14. Our Community Board has not been briefed on the Plan and residents are even less aware of this Plan than the Plan Change 14. Our board has made a submission, but we are not clear if the determination by the Hearings Committee and consequently Councils will impact the Independent Panel's decision making. It is anticipated that in early 2023 the three councils will adopt the Greater Christchurch Spatial Plan.

### The Two Legislative Changes

The public is confused regarding the two legislative changes:

1 The National Policy Statement On Urban Development, August 2020.

2 The imposition of medium density- with three units of three storeys- determined by both Labour and National parliamentarians in October 2021.

National is now saying they will rescind the medium density legislation, but the public do not realise that should medium density be rescinded the National Policy Statement on Urban Development remains.

Also Council's initial proposal was based on the understanding that Council needed to comply with medium density legislation unless "a qualifying matter" was determined. Consequently much more land was zoned for medium density than Council would have recommended.

If there is a change of government there is further complexity to this proposal.

# **Council's position**

Council was against the imposition of medium density through out the city and voted against the **initial proposal in September 2022**. A mediator was appointed and a" bespoke" proposal came back to Council on 17 March 2023. The bespoke proposal was reluctantly accepted ;3 Councillors voting against :10 voting in favour but reluctantly, and four voting positively for the proposal.

Those who reluctantly voted for the proposal considered central government could impose the earlier document or some other less desirable option if they voted against.

I was at the Council meeting and observed this directly.

The Section 42a has created another dimension: heights were increased, walking distances extended and new Centres added - in our area Wigram and Halswell.

# **Qualifying Matters**

There appears to be some criticism to the concept of qualifying matters. Our Board supports the principle of qualifying matters and ask that they are not removed. We accept there may be adjustment to them, but we oppose any legal challenge requesting they be removed.

# Should Christchurch be a Tier One City?

The Board considers it inappropriate for Christchurch to be a Tier One territorial authority under the Act. Christchurch has sufficient land supply for housing in the short, long and medium term. This is largely the result of the recovery plans, regeneration plans and the Independent Hearings Panel process for the Christchurch District Plan following the 2010-11 earthquake sequence. Our Board Chair has presented this option to Council, but the previous Mayor and Councillors decided to pursue a "bespoke" plan.

At the time central government determined Christcurch to be Tier 1 City, Christchurch did not fit the land scarcity criteria. Our Board understands Christchurch was included as it was the largest South Island city and the government considered it could not be left out.

### Conclusion

1 This is a plan created by medium density requirements from central government that was not welcomed by Council nor residents. As the medium density requirements are likely to be rescinded, if there is a change of government, the Board asks that the Panel pause the current plan once the intentions of a possible new government are clear.

2 The Board asks that the Panel take into account the unintended consequences of the unremitting height level from Deans Avenue to beyond Hornby Mall.

Thank you for the opportinity to speak to this submission.

Helen Broughton

Chairperson

Waipuna - Halswell, Hornby, Riccarton Community Board

12 October 2023