

BEFORE THE CHRISTCHURCH CITY COUNCIL APPOINTED PLAN
CHANGE INDEPENDENT HEARINGS PANEL

**Statement by Helen Broughton on behalf of the Waipuna Halswell, Hornby,
Riccarton Community Board. Submitter 902 Plan Change 14 and 1090 Plan
Change 13.**

Thank you for the opportunity to speak.

I currently Chair the Waipuna Halswell, Hornby, Riccarton Community Board and have a strong interest and involvement in planning. I was a City Councillor between 2001 and 2013 and a member of all the planning committees, I am accredited to sit on RMA panels.

As stated in previous submissions all areas of the Board are facing pressures from growth. Riccarton and Hornby are particularly impacted by Plan Change 14 as each has a Large Town Centre with a Large Local Centre, the Bush Inn Centre, in between. Halswell will have a Large Local Centre in the future, but I have received no comments on this.

The Residents' Associations of Hornby and Riccarton are highly concerned at the proposals that have shifted dramatically with and during the Section 42a reports. I was a submitter as an individual and on behalf of the 2013-2016 Community Board for the 2015 District Plan, also determined by an Independent Hearings Panel chaired by Judge Hansen: I do not recall the degree of change with 42a reports. There appears to be continual shifting of position.

All Riccarton, Hornby and Halswell Resident Associations have lodged submissions and all, from my understanding, are proposing to speak.

They are:

The Greater Hornby Residents' Association
Riccarton Bush, Kilmarnock Residents' Association
Deans Avenue Precinct Society
Central Riccarton Residents' Association
Church Corner Residents' Association
Ilam Upper Riccarton Residents' Association.
Halswell Residents' Association.

The process is not easy for the lay submitter. I personally have found it extremely difficult to keep up with the 42a reports. There are many lay submitters who are

deeply concerned ,but have not chosen to speak and some residents who have been included in the redrawn high rise category after the 42a reports and there is no legal opportunity for them to speak.

Residents in Riccarton and Hornby are concerned at the high- rise density required under NPS UD 2020 and many are concerned at the medium density requirements {MDRS }of the Housing Enabling Bill. The 3 units of 3 storeys on any section is particularly destructive of current communities and our Board requests that at the very least this requirement be removed should the incoming government remove MDRS.

Medium density may no longer be a requirement of Government in four months. The incoming Government has indicated a number of policies will be removed in the first 100 days. If reporting is accurate, the NZ Herald on 17 October 2023 indicated the Medium Density Residential Standards would be one of the policies to go.{Refer Attachment 1.}

While our Board understands that the panel can only work with current legislation, we request that you consider the likely removal of medium density as you work through the Christchurch District Plan.

Visual Impact of Medium And High Rise Density - The drawings by Wendy Hoddinott of WSP, done on request of Council, demonstrate how dominant six storeys and even three storeys are likely to be . There is minimal setback from the street and there will be no front gardens or foliage. Is this what the Christchurch community wants Christchurch to become? {Attachment 2}

Christchurch Does Not Have a Housing Issue

Christchurch does not have a housing issue if we are working out to 2050. This is the only time frame required in Plan Change 14.

The lack of housing pressure is supported by Ms Oliver in her final Section 42 a report.

In Section 10.7 she states ” there is adequate supply to meet and well exceed 30 year projected business and housing demand.”

Section 10.15 “PC14 and its level of enablement goes well beyond meeting demand projections, certainly the 30-50 year projections and demand for smaller houses and demands for smaller dwellings.”

Section 10.19 “Prior to legislative change to incorporate MDRS across all relevant residential areas and the application of NPS - UD Policy 3, the District Plan adequately addressed long term housing and business demand.

In terms of demand the Operative District Plan provides a level of enablement to meet long term housing demand projections. Consequently the MDRS and Policy 3 of the NPS UD directs a planning response that will provide a level of enablement well beyond a 30 year planning period. It points to a level of enablement well beyond a thirty year period towards a population of 1 million people or **a century of growth.** “

10.21 Additional enablement is unnecessary to meet long term projected demand. There is no need to enable” development at all costs.”

In October 2019 the previous Mayor Lianne Dalziel wrote a long letter to the Minister of the Environment advising we had no land scarcity. {This is tabled as Appendix One} in our initial submission. The Minister did not reply but did include Christchurch as a Tier One City. I consider that was the response to our previous Mayor’s letter.

The longer timeframe

Our Board and residents first became aware of a longer time frame for housing development on 11 September 2023 in a meeting with Council planning staff and invited residents’ groups. The time frame anticipated by Council planners was 130 years. Everyone was astounded and concerned. It is impossible to see or model so far out; it is not clear why the timeframe has been extended. I doubt the extended timeframe has been ratified by Council and it should not be used to increase the height levels or densities of commercial or residential dwellings.

This process has been imposed unwillingly on Christchurch by central government, It is generally not supported by local residents and our Board urges the panel only keep to the time frame required in Plan Change 14. It appears judicially incorrect to have a dramatically longer time frame emerging after submissions have been lodged.

Social Impact

There was no section 32 assessment of the social impact when the Draft Plan

went to Council on 17 March 2023. This is against the RMA legislation and was questioned at the time by Councillors and the Civic Trust. The response by the Council Planning Manager was that social impact report would be done with submissions taken into account.

Sarah Oliver has done a social impact assessment based on an assessment by Rachel Foy. There is no criticism of these two planners, but the collective concerns of residential submitters have not come through clearly to the Panel. One of the social impacts is the destruction of existing communities, which at a public meeting lead to sadness among older longstanding residents and anger by newly arrived residents {generally younger with families} who had chosen a suburban density environment only to hear it was potentially going to six storeys.

Qualifying Matters

Our Board supports the following qualifying matters and requests they be retained and would support extension.

1 Recession Planes and Sunlight - Our Board supports and suggests it go further to enable provision for all ground floor dwellings to have access to sunlight all year round.

2 Industrial Zone - supports the buffer and height constraint and suggests it goes further as proposed by Ravensdown. Dust and emissions are currently an issue with the quarries in the Hornby ward and have been an issue in the past with Ravensdown.

Our Board cross submitted supporting Christian Jordan. Christchurch needs to protect the residential area as much as possible. Kainga Ora's approach on this and other infrastructure submissions should not be adopted.

2 Noise Contours - Our Board fully supports the Airport Noise Contours.

It is critical that Christchurch has a 24/7 functioning airport. Our Board supports the increased contours and is not clear why there is now the suggestion that Environment Canterbury needs to determine the contours. It was our understanding that Ecan was working closely with Council to develop the model and both were expecting a revised model that has been internationally peer reviewed.

However if the panel decides that Ecan should approve the increased noise control area through the RPS, our Board requests that areas in the enlarged noise control areas be retained at current density levels until the RPS confirms the new noise

levels. There would then potentially need to be a District Plan Change.

Riccarton Bush interface - Fully accept but consider the interface should be extended.

Our Board will address later. Our Board considers this qualifying matter needs to be maintained regardless of whether the Airport Noise Contours are validated. It is important that Riccarton House and Bush and the surrounding environment are protected into the future.

NZ Rail Interface Sites- Our Board supports the position by NZ Rail. We cross submitted on July 17.

Outstanding and Significant Natural Features - Our Board has already reported that Riccarton Bush is an outstanding natural landscape and support the Riccarton Bush Interface being a qualifying matter. Our Board supports it going further.

Trees and Financial Contributions - supported, with some suggested amendment to financial contributions.

Public Open Spaces- Council position supported in a cross submission.

Electricity Transmission Corridors: Our Board supports Orion's position in our first submission and cross submissions.

High Rise For Straven Road to Deans Avenue

Ike Kleynbos suggests in his 42a report that if the Airport Noise Control Qualifying Matter is accepted the area between Straven Road, Deans Avenue and Matai Street, Riccarton Road should be 9 to 10 storeys. He speaks of a compensatory requirement.

I have spoken informally to a resource management lawyer and there is no requirement in the RMA for compensatory practice. As Ms Oliver states there is sufficient capacity until 2050.

Can I urge the panel to disregard this attempt to make one suburban area go higher because another is included in a recently suggested enlarged qualifying matter.

There is no legal requirement for this to occur and our Board requests the Panel to strike this out. There is considerable community concern at this development.

Local Issues

All Residents' Associations will speak to their own area and the Board fully supports their concerns. Our Board is summarising our concerns from our initial position paper.

At this stage the Chair requested that the submission stop as the panel had read the submissions of the Residents' Association.

Conclusion The Riccarton/Hornby area, already under pressure is being overloaded with housing intensification, particularly high density intensification.

Our Board requests that as there is no business or housing demand until 2050, that the panel only allows intensification no other option is possible.

Helen Broughton'

Chairperson, Waipuna Halswell, Hornby, Riccarton Community Board.

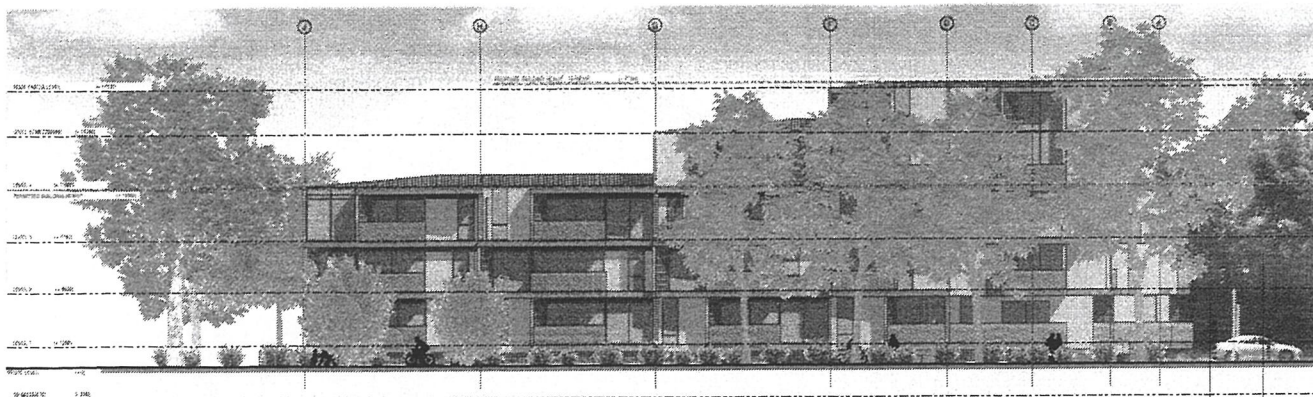
8 November 2023



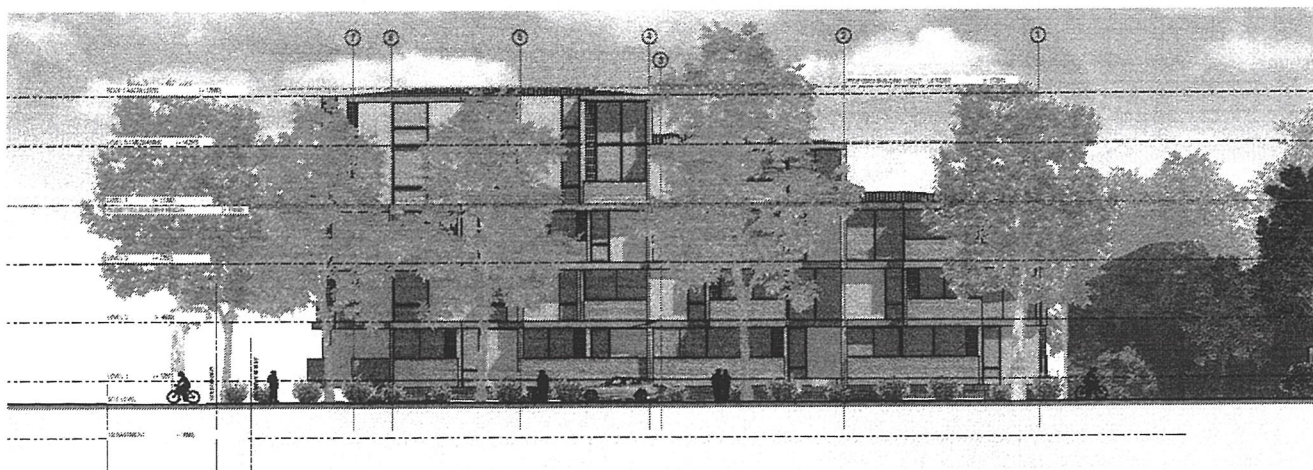
Figure 21: Rata Street looking northwest towards Pūtarīngamotu Riccarton Bush, with graphic overlay showing possible apartment configuration under a proposal of 12m height limit within the Riccarton Bush interface.



Figure 22: Rata Street looking northwest towards Pūtarīngamotu Riccarton Bush, with graphic overlay showing 20m height limit and possible apartment configuration under the NPS-UD Built Form Standards. Outcome may vary through High Density Residential Standard provisions.



Apartment east elevation



Apartment north elevation

Visual dominance

The apartment building would be noticeably high against the lower existing buildings on the site and the open space at Hagley Park. The dominance of the building in this context would be noticeable to those moving along Deans Avenue and Matai Street East, and to users of the north west corner of Hagley Park and Christchurch Girls High School (CGHS). There is also the potential for it to be seen from the residential neighbours on Darvel Street.

The visual dominance would only be perceived for a short duration by those using Matai Street East, Deans Avenue and Hagley Park. The nearby residential sites at Darvel Street would be separated from the apartment building by approximately 150m, and space within which there would be 12 townhouses of a permitted height. CGHS would have longer duration experiences of the visual dominance, but the nearest school building would be the proposed performing arts centre which is of a similar scale.

I also consider that there are a number of mitigating factors for the visual dominance of the apartment building.

The scale and dominance of the apartment building could be balanced by the proposed 15.6m high performing arts centre to be located across Matai Street East which will be located near Matai Street East.

The north and east elevations of the apartment building have been broken up by the design of the units, so well-articulated elevations are presented to the street rather than a monotonous structure.

The retained tall trees and the proposed trees (with a minimum height at planting of 2m) located between the apartment building and the street would soften the structure and echo the type of environment present in the north west corner of Hagley Park where there are dense, tall trees.

The highest part of the apartment building is set back further than the rest of the building from the road boundary on the Matai Street East frontage, so as it gets higher and more dominant it is further distanced from other sites and public spaces, mitigating its own dominance by its layout.

The short duration of use of the nearest surrounding spaces and sites, and the mitigating factors noted above, have led me to consider that the extent of the visual dominance for nearby sites would be less than minor. Any other users of the surrounding public spaces would be experiencing the dominance of the building for short durations but given the busy nature of Deans Avenue, the heavy use of Hagley Park and prominent location of

Health Star Rating for food

Reti said he wants to scrap Health Star Rating for food in September this year.

Reti said he was unsure what the nutrition rating system could be replaced by, but there were better models being developed overseas that New Zealand could adopt.

“It’s not clear to me anymore that it’s fit for purpose,” Reti said.

The Health Star Rating is voluntary and uses a scale of 0.5 to five stars to rank packaged food on its nutrient profile. It was introduced by the National-led Government in 2014 and updated in 2019 to give tougher ratings for foods which were high in salt and sugar.

RMA reforms

National’s RMA reform spokesman Chris Bishop said he would repeal Labour’s Resource Management Act reforms, what National calls the RMA 2.0 legislation and introduce a fast-track consenting regime.

“National will campaign on our own changes to the RMA, some of which we have already announced, including one-year consenting for major infrastructure and renewable energy projects, alongside our Going for Housing Growth plan. If elected, we will legislate for these in our first term.

“We will also begin work on a longer-term programme to repeal and replace the RMA,” Bishop said in August.

Clean Car discount

The Clean Car Scheme, which subsidises the purchase of electric vehicles and hybrid with fees collected on polluting cars, which National calls a “ute tax” will be gone by the end of the year, according to National’s plan.

They have promised to repeal it by December 31, this year. The scheme came into effect in 2021.

Auckland Regional Fuel Tax

The party will introduce legislation to remove the Auckland Regional Fuel Tax (RFT), which adds 11.5 cents per litre of petrol, or \$7.70 for a full standard tank.

Auckland Mayor Wayne Brown said he supported the removal of the RFT but only as part of a plan to replace the revenue with “time-of-use” charging.

Sausage flat law

The Medium-Density Residential Standards (the 3x3 “sausage flat” law) that are designed to prevent urban sprawl, would also be gone in the first 100 days, with work beginning on its replacement.

Luxon has previously said he is “ruthlessly obsessed” with building more houses, but would prefer to see a much greater focus on greenfields developments, which means converting farmland into suburbs.