

Commercial Chapter

Submission by;

**Helen Broughton, Chairperson,
Waipuna, Halswell, Hornby, Riccarton Community Board.**

Our initial submission was detailed, covering concerns regarding the residential, commercial, industrial and qualifying matters. Our Board subsequently made cross submissions to the commercial chapter that are attached as Appendix 1.

The Chairperson has consequently read the 42a reports and technical evidence of:

Ike Kleynbos ; CCC planner

Kirk Lightbody; CCC Planner

Timothy Heath; Property Economy

Sarah Oliver ; CCC Planner

Our Board notes that only Ms Oliver has a longstanding connection to Christchurch. Ms Oliver has been through Christchurch earthquakes and aftershocks.

The process is exceedingly difficult and virtually impossible for the lay submitter. There have been changes during the evidential period after submissions closed. Section 42a by Ike Kleynbos came as a complete surprise to residential submitters, when presented by Council staff on 11 September.

The Chairperson does not recall such major change in any Section 42a report during the previous 2015 Plan Change.

Major changes arising from the Section 42a reports appear to be against “natural justice” as submitters who failed to originally submit have no chance to participate.

Even experienced submitters are experiencing difficulty understanding developments. There appear major changes in the expert witness statements. This may be because the direction is being determined by central government through the National Policy Standards on Urban Development and the Medium Density Residential Standards of the Housing Enabling Act.

There has been a long time since Councilors were directly involved with a Christchurch District Plan Change. The previous Plan Change of 2015 had an appointed Hearings Panel, as does the current Plan Change.

The last plan change that ran a more conventional course commenced in 1995. There has been in a generational shift at Council and since 2013 Councilors have not undertaken RMA training to sit on Hearings Panels.

The Waipuna Halswell, Hornby, Riccarton Board has three large commercial centres in its area, with a fourth one planned for Halswell.

Our Board Supports;

1 Retention of Town Centres : our Board strongly opposes Town Centres being made into Metropolitan Centres as suggested by some submitters. We request the panel accept the recommendations of Council on this issue. Please note that Riccarton Town Centre is unusually close to the Central City. Our Board suggests less than the 2 km if taken from Picton Avenue to Christchurch Hospital, the edge of the central city. (Less if starting with the retail shops close to Riccarton Avenue). As commented on in earlier submission the closeness of central city and Riccarton was not due to any formal planning consideration. It could be considered a major “mistake”.

2 Simplification of Centres ; Our Board supports removing the Medium Local Centre. This leads to greater simplification. We are pleased our suggestion was accepted.

3 Revitalising the Central City 3.3.8 remaining one of the Primary Objectives in the District Plan. We understand from Ms Oliver’s report this objective remains largely unaltered.

Our Board opposes;

1 The Increase of height to 32 Metres for Riccarton as recommended by Mr Kleynbos.

It is not clear what the reason is for this increase. The Chairperson has read the report by Mr Kleynbos and Mr Lightbody and could find no reason given.

It appears to have originated in a recommendation from Scentre to increase the height of it’s Riccarton complex to 50 metres or from Mr Timothy Heath’s report where he recommends 32 metres for the large centres. This is completely out of scale with Christchurch and possibly reflects the Auckland and Australian environments. Please note both Scentre and Mr Heath are Auckland- based.

{The Chairperson had a discussion with Mr Lightbody at the hearing and understands the height increase was due to the central city’s height which means in his view Town Centres should be proportionate. }

If the height of 32 metres is based on Mr Heath’s analysis, he is recommending a height that is unlikely to be justifiable in terms of the earthquake proneness of the central city and the Christchurch public’s acceptance of high buildings. Our Board does support a reduction in height for the Central City, but did not comment in our submission as this was outside our Board’s area.

We suggest 22 metres which was suggested by Scentre in the first round of submissions. In the current District Plan the height was 20 metres. Scentre have made two submissions 260 and 2090. Appendix 2 establishes the indicated heights.

2 It is critical that Town Centres do not undermine the Central City Revitalisation as stated as an existing objective by Ms Oliver.

Even prior to the earthquake Riccarton took 33 % of the retail market share, while the central city was at 8%.

The higher the Riccarton commercial centre is developed, the more the central city will be drained. It is noted that residential heights should be commensurate with commercial heights. Our Board does not accept this position, but the planners seem to see it as a given.

It is argued a vibrant central city needs more residential living. If heights are increased in Riccarton, the central city revitalisation will remain elusive and the city as a whole will lose. The Board Chair references a USA city without a City Centre.

(My daughter lives in Lansing the capital of Michigan which is about the same population size as Christchurch, surrounded by orchards and farmlands, but without a central city even though Michigan State University of 50,000 students is based there. Something is missing without a central city and Christchurch must do everything to protect the central city. Lansing has a spinal highway and various suburban malls off this major route.)

3 Height Consistency for All Large Town Centres

In the documents tabled by Kainga Ora, Ike Kleynbos and Kirk Lightbody, all three Large Town Centres have a height of 22 metres. Riccarton is now tabled at 32 metres.

Where is the consistency with this? It is not clear why Riccarton is separated out.

In documents and submissions the three large centres are tabled together.

4 A Height of 22 Metres for the Large Local Centres

Our Board suggests that heights for large local centres return to 20 metres as in the original proposal. This would include Church Corner, Merivale, Sydenham North.

We would recommend lower, but the 20 metres would align with the initial proposal.

5 Should the Bush Inn area be a Large Local Centre?

It is a large building but there is no supermarket and many shops within the complex are shut. Across Waimairi Road is a collection of small Asian restaurants and some retail stores. The two areas are disjointed and the area outside the Asian restaurants has poor parking facilities and there is severe congestion on the roads surrounding this area. Our Board does not see how this area could be developed to 22 metres in height without severe traffic congestion. This complex is bordered by intensified low rise housing.

If this area could be redefined as small local Centre the height would be 14 metres.

Our Board requests the panel look carefully at the main Bush Inn Centre.

6 Suburban Retail and Business Premises included within Large Centre Areas

There needs to be recognition that even the large centres have suburban style shops around them. In Riccarton there is a large shopping mall - Scentre/Westfield - but on the other side of Riccarton Road there are two to three storeyed suburban shops, with largely small business owners. There is also a road behind these shops so it is difficult to see them reaching the height of 32 metres.

Our suggestion is they retain the original zoning of 20 metres or 14 metres if that can be achieved. There will be other Centres with the same situation and their height should also be reviewed.

We also ask for no changes to setbacks or recession planes.

Agreement on setbacks and recession planes was negotiated with Council planner Mark Stevenson during the 2015 District Planning process.

7 The Central City Moving Further Out

Our Board opposes the 15 Minute walking distance proposed by Kainga Ora.

Council seems to be creating “a fuzziness” around the central city boundary.

It has always been clear that the four avenues defined the central city both in planning and practical terms.

There now appears to be a walkable catchment defined quite broadly, which includes Deans Avenue and the area represented by the Deans Avenue Precinct Society, within the Central City.

Our Board strongly opposes this and requests the four avenues define the Central City.

Housing and Commercial Development is needed in the Central City not Riccarton. The more apartments/town houses are built in Riccarton the fewer apartments/town houses will be built in the city. To accept this suggestion will cause additional issues for central city revitalisation.

Kainga Ora Have questioned many details in the Plan and our Board does not consider it appropriate that urban planners in Auckland should be determining our city’s centre nor other centres..

8 General

a: Our Board supports the Airport Noise Qualifying Matter and its proposed boundaries. We are concerned at Council suggesting it be temporary, but will argue this in another section.

b: Oppose 118.1 and 118.7 by Spreydon Lodge. Our Board supports retention of the civic square and green corridor.

Thank you for the opportunity to lodge this submission.

Helen Broughton

Chairperson

Waipuna Halswell, Hornby, Riccarton Community Board

October 25 ,2023