

BEFORE CHRISTCHURCH CITY COUNCIL

Independent Hearings Commissioners

UNDER THE

the Resource Management Act 1991
(the **Act**)

IN THE MATTER OF

A request by Ara Poutama Aotearoa/Department of Corrections for resource consent to establish a rehabilitative and reintegrative residential accommodation programme with an existing property at 14 Bristol Street, Christchurch (RMA/2020/173)

MEMORANDUM OF COUNSEL

Dated: 3 December 2021

GREENWOOD ROCHE
LAWYERS
CHRISTCHURCH
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MAY IT PLEASE THE COMMISSIONERS

- 1 The Applicant notes the new information contained in Counsel's Memorandum dated 30 November 2021 on behalf of the Bristol Street Network.
- 2 As the Commissioners will appreciate, the Applicant has no visibility over information held by the New Zealand Police and as such, cannot speak to the content of what has been provided.
- 3 The Applicant can, however, advise that the Police might have visited the Anglesea property for a variety of reasons including conducting interviews in relation to historical incidents or charges or assisting with those who choose to leave the programme in a managed way (as described to you by Mr Kilgour). As such, I would urge you not to draw any conclusion in respect of the new information that is not otherwise supported by the balance of the evidence.
- 4 In that regard, the Commissioners' attention is specifically drawn to the Social Impact Assessment Report (**the Report**) dated 28 January 2021 prepared and attested to by Ms Linzey as part of her expert evidence to you. As set out in the Report, part of the analysis included contacting the Hamilton Police to discuss the existing programme at Anglesea Street in Hamilton.
- 5 At page 23 of the Baseline Research – Tai Aroha Case Study (attached as Appendix A to the Report) the authors note:

"Our review of crime statistics do not note any variation to other comparable areas and residents noted other issues as comprising safety unrelated to Tai Aroha. Police presence is minimal and when approached for our research, they stated that they felt unable to comment due to minimal interactions with the residence (Tai Aroha Police Liaison Officer) and did not note any patterns of crime attributed to the residence."

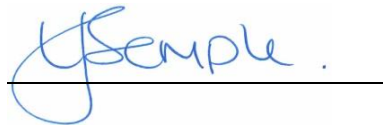
- 6 It is also useful to note that at page 33 of the Social Impact Report, the author's comment that:

"Interviews with Christchurch Police did not identify concern with regards to the programme being established and it was suggested that the residents within this programme would be subject to more support and supervision than those managed in the community under general home detention (in a similar commentary to that provided by

*Dr Cording above). In terms of policing generally, it has been observed that these types of facilities are generally managed by staff and require little input or attention from police. For example, it is noted that in **Hamilton police reported they had very limited interaction with the programme.**" (emphasis added).*

- 7 In my submission, the fulsome Social Impact Assessment undertaken and attested to by Ms Linzey in expert evidence, holds considerable weight in relation to this matter, as does the comprehensive peer review undertaken by Ms Strogon for the Council. If the Commissioners are minded to give any consideration to the new information provided by the Network, such information should be carefully considered in light of this expert assessment.

DATED this 3rd day of December 2021



L J Semple

Counsel for Ara Poutama Aotearoa / the Department of Corrections