

Christchurch City Council report for referred recommendations on Plan Change 14 (IPI) to the Minister for the Environment – Addendum Report

2 April 2025

Minister of Housing, Hon Chris Bishop

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Tēnā koe Minister,

Addendum Report to 24 February 2025 report on Alternative Recommendations

On 24 February 2025, Christchurch City Council (Council) submitted a report referring to the Minister under cl.101(2) of Schedule 1 of the Resource Management Act 1991 the 20 Independent Hearings Panel recommendations that Council rejected, and its alternative recommendations, on its IPI – Plan Change 14.

Ministry for Environment staff in early March 2025 requested Council to provide more detail on specific parts of evidence that supported the alternative recommendations put forward, to detail the s77I and s77O alignment for qualifying matters, and address any errors or omissions in the original report.

The following is a verbatim list of the alternative recommendations in the original report, providing the additional information requested, as relevant. Council notes that the IHP recommended and the Council accepted the introduction of a new [sub-chapter 6.1A – Qualifying Matters](#) – which Council proposed in response to the evaluative requirements of sections 77J and 77P of the Act.

Council Alternative Recommendation Summary	Any additional details on evidence, s77I/s77O alignment, or other relevant information
Have a Riccarton Bush Interface Area qualifying matter (QM).	<p>This was proposed as a QM under s77I(a) – section 6 matter of national importance.</p> <p>The Alternative Recommendation seeks to apply the Council Reply position, and therefore all associated materials referenced in the 24 February 2025 report are applicable.</p>

Council Alternative Recommendation Summary	Any additional details on evidence, s771/s770 alignment, or other relevant information
Add to matters of discretion to consider Papanui War Memorial Avenues.	<p>This is not a QM as it does not restrict development enabled by MDRS or any building height or density enabled under Policy 3 of the NPS-UD, therefore making s771 unapplicable.</p> <p>There is no specific evidence on this alternative in the IHP records because the Council was seeking to protect these values as a QM. The alternative is to protect the values without being a QM and without changing the consenting threshold. This alternative reflects the IHP's interpretation on the High Court precedent.</p> <p>All relevant material is contained in the 24 February 2025 report.</p>
Reduce the Policy 3(d) High Density Residential Zone (HRZ) catchment around the Town Centre zone of Riccarton.	<p>This is not a QM but is the Council's recommendation on achieving Policy 3(d) surrounding the Town Centre zone of Riccarton in a way that the Council considers preferable to the recommendation of the IHP.</p> <p>Please refer to 24 February 2025 report for all other relevant information.</p>
Increase the height overlay for 25 Deans Avenue from 20m to 36m.	<p>This is not a QM but rather a different interpretation of the required application of Policy 3(d) from the Town Centre zone of Riccarton.</p> <p>The Alternative Recommendation for a 36m building height overlay originates from the Kāinga Ora (#834) submission on PC14 regarding Riccarton¹. This was later supported by the planning evidence of Mr Jonathan Clease², though this site appears to be beyond the 400m catchment boundary where 36m should be limited to, as recommended by Mr Clease (see Appendix 6 of associated evidence). Planning conclusions are further supported by economic evidence of Mr Fraser Colgrave³.</p>
Remove the Policy 3(d) catchment for Peer Street Local Centre Zone.	<p>This is not a QM but is the Council's recommendation on achieving Policy 3(d) surrounding the Local Centre zone of Peer Street in a way that the Council considers preferable to the recommendation of the IHP.</p> <p>The Alternative Recommendation seeks to apply the Council position throughout Plan Change 14 that only select Local Centre zoned areas were at a scale where a proportionate response under Policy 3(d) was justified. This is reflected in the larger Local Centre surrounds that were proposed as High Density Residential Zone and the lesser category where the 'Local Centre</p>

¹ See page 700 of [submission content](#) on PC14, noting the reference to "Height Variation Control – 36m".

² Planning evidence of [Jonathan Clease](#) on Centre Hierarchy and Commercial Provisions, 20 September 2023, specifically pages 59-60.

³ Economic evidence of [Fraser Colgrave](#), 15 September 2023.

Council Alternative Recommendation Summary	Any additional details on evidence, s77I/s77O alignment, or other relevant information
	Intensification Precinct' (LCIP) was proposed to apply. The applicable evidence is contained in the notified Residential section 32 evaluation report and the s42A report of Mr Ike Kleynbos (see referenced evidence for Alternative Recommendation for LCIP).
Have a City Spine QM.	<p>This was proposed as a QM under s77I(j) – other matter.</p> <p>It is noted that the aforementioned Chapter 6.1A incorrectly lists this as a matter under “s77J” while the section 32 evaluation report⁴ correctly describes this as an ‘other matter’.</p> <p>Please refer to 24 February 2025 report for all other relevant information.</p>
Have a Sunlight Access QM.	<p>This was proposed as a QM under s77I(j) – other matter.</p> <p>The Alternative Recommendation seeks to apply the Council Reply position, and therefore all associated materials referenced in the 24 February 2025 report are applicable.</p>
Reduce the Policy 3(d) catchment around the Town Centre Zone of Hornby.	<p>This is not a QM but is the Council’s recommendation on achieving Policy 3(d) surrounding the Town Centre zone of Hornby in a way that the Council considers preferable to the recommendation of the IHP.</p> <p>Please refer to 24 February 2025 report for all other relevant information.</p>
Reduce the permitted building height within Hornby High Density Residential zoned areas.	<p>This is not a QM but is the Council’s recommendation on achieving Policy 3(d) surrounding the Town Centre zone of Hornby in a way that the Council considers preferable to the recommendation of the IHP.</p> <p>Please refer to 24 February 2025 report for all other relevant information.</p>
Reduce the Policy 3(d) Town Centre Zone (TCZ) building height for Hornby.	<p>This is not a QM but is the Council’s recommendation on achieving Policy 3(d) for the Town Centre zone of Hornby in a way that the Council considers preferable to the recommendation of the IHP.</p> <p>Please refer to 24 February 2025 report for all other relevant information.</p>
Reduce the Policy 3(d) Town Centre Zone (TCZ) building height and form for Linwood.	<p>This is not a QM but is the Council’s recommendation on achieving Policy 3(d) for the Town Centre zone of Linwood in a way that the Council considers preferable to the recommendation of the IHP.</p>

⁴ Qualifying Matters section 32 evaluation report ([Part 3](#)), paragraph 6.31.9, page 396 (or 205 of PDF).

Council Alternative Recommendation Summary	Any additional details on evidence, s771/s770 alignment, or other relevant information
	<p>This Alternative Recommendation seeks alignment with Council's Alternative Recommendation for the Sunlight Access qualifying matter, however such a change in approach to recession planes along residential boundaries is not considered a qualifying matter as the Policy 3(d) response is still provided for. Please refer to 24 February 2025 report for all other relevant information.</p>
<p>Reduce the Policy 3(d) catchment around the Town Centre Zone of Linwood.</p>	<p>This is not a QM but is the Council's recommendation on achieving Policy 3(d) surrounding the Town Centre zone of Linwood in a way that the Council considers preferable to the recommendation of the IHP.</p> <p>The Alternative Recommendation applies Council's notified position captured in the Residential section 32 evaluation report⁵.</p>
<p>Reduce the permitted building height within Linwood High Density Residential zoned areas.</p>	<p>This is not a QM but is the Council's recommendation on achieving Policy 3(d) surrounding the Town Centre zone of Linwood in a way that the Council considers preferable to the recommendation of the IHP.</p> <p>The Alternative Recommendation report notes the negative social implications of intensification, which is reflected in various submissions, including material presented⁶ to the IHP during the PC14 hearing. Please refer to 24 February 2025 report for all other relevant information.</p>
<p>Modify the Airport Noise Influence Area QM.</p>	<p>This was proposed as a QM under s771(e) – Safe or efficient operation of nationally significant infrastructure.</p> <p>Council's 24 February 2025 report provides links to all relevant information. The following specific key pieces of evidence are noted as they relate to the Alternative Recommendation:</p> <ul style="list-style-type: none"> • Council's alternative recommendation largely relies on the evidence of CIAL (Christchurch International Airport Limited), as noted in the s32 report on qualifying matters⁷ and the s42A report of Ms Sarah Oliver⁸. Other options were also briefly discussed in paragraph 6.20.6 of the s32 evaluation report.

⁵ Part 3 of Plan Change 14 evaluation report: [Residential](#). See 'Issue 3' pages 65-72 and associated evidence.

⁶ For example, Te Whare Roimata #105 presented to the IHP on 22 November 2023 and were subsequently requested to provide additional material. The results of a [Participatory Research Study](#) were later provided to the IHP outlining the negative social implications experienced in the eastern suburbs of Christchurch.

⁷ Part 2 of the [s32 evaluation report](#) on Qualifying Matters, paragraph 6.20.5.

⁸ S42A Report of [Sarah Oliver](#), 11 August 2023, paragraph 12.41.

Council Alternative Recommendation Summary	Any additional details on evidence, s771/s770 alignment, or other relevant information
	<ul style="list-style-type: none"> • The CIAL s32 report evidence⁹ states that the operative rules should apply. • Council further considered the revised airport noise contours and options available in the s42A report of Ms Oliver¹⁰. Section 12 of this report also discusses the proposal of retaining HRZ (High Density Residential zone) over an area north of Riccarton Road, within the contour.
Modify the High Density Residential zoning (HRZ) for 231 Milton Street and 12 Johnson Street.	<p>This is not a QM, but rather a correction of zone boundaries to reflect the change in boundary configuration between the dates of notification of the plan change and s42A report publication. It is acknowledged that the referenced address of '12 Johnson Street' is also described as 14 Johnson Street and 2 Barnett Ave in other reports or evidence.</p> <p>Please refer to 24 February 2025 report for relevant information and the Planning evidence of Adele Radburnd¹¹.</p>
Have a Local Centre Intensification Precinct (LCIP).	<p>This is not a QM but rather a different interpretation of required application of Policy 3(d) for Local Centre Zones.</p> <p>The Alternative Recommendation seeks to apply the Council Reply position (modified to align with the balance of the IHP Recommendation), and therefore all associated materials referenced in the 24 February 2025 report are applicable. The key evidence is contained in the s32 report on residential matters¹² and the s42A report of Mr Ike Kleynbos¹³.</p>
Remove the Daresbury heritage listing QM.	<p>This was proposed as a QM under s771(a) – section 6 matter of national importance.</p> <p>Specific evidence that relates to the heritage significance of Daresbury has been summarised as follows. Please refer to 24 February 2025 report for all other relevant information, specifically, Attachment 6 to the 24 February report.</p> <p>For the submitter:</p>

⁹ Section 32 Evaluation Report: [Airport Relation Qualifying Matters in the Christchurch District Plan](#), CIAL, 8 July 2022. Specifically, paragraph 2.7.3 and pages 22 to 25.

¹⁰ S42A Report of [Sarah Oliver](#), 11 August 2023. Specifically, paragraphs 12.21 to 12.23 and 12.34.

¹¹ Planning Evidence of [Adele Radburnd](#), ChistchurchNZ Limited, 19 September 2023. See pages 22-22 and Appendix 2.

¹² Part 3 of Plan Change 14 evaluation report: [Residential](#).

¹³ S42A report of [Ike Kleynbos](#), specifically, paragraphs 6.1.70 to 6.1.75, and 6.1.100.

Council Alternative Recommendation Summary	Any additional details on evidence, s771/s770 alignment, or other relevant information
	<ul style="list-style-type: none"> Mr David Pearson¹⁴ provided heritage evidence stating that heritage values and integrity have been compromised as a result of the Canterbury Earthquakes. He is silent on whether he considers the building in its current state to be ‘significant’ rather than ‘highly significant’ as a result of those compromised heritage values and integrity. He considers that after the repair works, the building may be assessed as significant rather than highly significant due to a reduced level of integrity and authenticity caused by the required works. Mr Pearson’s Hearing Statement¹⁵ suggests that a further assessment of Daresbury in its present condition could result in it being assessed as a ‘significant’ rather than a ‘highly significant’ heritage item and that this may continue to be the situation if ever the building were to be restored. He notes that a further assessment of Daresbury may determine that it is now a “Significant” historic heritage place, which, in his opinion, would be an appropriate outcome. Mr Jonathan Clease¹⁶ provided Planning evidence that Daresbury is likely to still retain heritage values, albeit degraded as a result of damage to fabric. Mr Clease notes Mr Pearson’s conclusions, where he considers that after repair, the building would be considered Significant rather than Highly Significant in terms of heritage values. <p>For Council:</p> <ul style="list-style-type: none"> Mr William Fulton¹⁷ provided heritage evidence that the heritage categorisation of Daresbury remains ‘Highly Significant’ and should therefore remain identified as such in the schedule. He states that the proposed works will not compromise the heritage significance of Daresbury. Ms Amanda Ohs¹⁸ provided further heritage evidence and considered that the heritage item and setting meet the policy for scheduling as a ‘Highly Significant’ heritage item.

¹⁴ Heritage evidence of [David Pearson](#), Daresbury Limited, 20 September 2023. Specifically, paragraphs 18, 19, 43, 57, 58, 61, and 64.

¹⁵ Hearing Statement of [David Pearson](#), Daresbury Limited, 17 April 2024. Specifically, paragraphs 20 and 23.

¹⁶ Planning evidence of Jonathan Clease, Daresbury Limited, 20 September 2023. Specifically, paragraphs 27 and 40.2.

¹⁷ Heritage evidence of [William Fulton](#), Christchurch City Council, 11 August 2023. Specifically, paragraphs 60 and 70.

¹⁸ Heritage evidence of [Amanda Ohs](#), Christchurch City Council, 11 August 2023. Specifically, paragraphs 215 to 222.

Council Alternative Recommendation Summary	Any additional details on evidence, s77I/s77O alignment, or other relevant information
	<ul style="list-style-type: none"> Ms Suzanne Richmond¹⁹ provides Planning evidence that adopts the technical evidence of Ms Ohs and considers that the dwelling is nationally significant, and continues to meet the significance threshold for a heritage item in c.i. of the scheduling policy 9.3.2.2.1 in its current condition.
Remove Antonio Hall heritage listing QM.	<p>This was proposed as a QM under s77I(a) – section 6 matter of national importance.</p> <p>Council’s 24 February 2025 report contains all other relevant information for heritage items and settings.</p>
Remove the Piko Residential Character Area.	<p>This was proposed as a QM under s77I(j) – other matter, in accordance with the definition of ‘existing qualifying matter’ under s77K(3) of the Act, as the area was already a character area prior to the IPI.</p> <p>The 24 February 2025 report contains an error on page 12 when describing the anticipated zoning for either decision on the Piko Residential Character Area. This should instead describe that the anticipated zoning under the scenario of the Council’s adoption of the IHP Recommendation (to retain the Character Area in a reduced form) would be Medium Density Residential Zone (MRZ), while the anticipated zoning under adoption of the Council Alternative Recommendation (to remove the Character Area) would be to retain operative zoning of Residential Suburban Density Transition zone (RSDT).</p> <p>It is further noted that this area intersects with the Airport Noise QM and, if the Minister accepts the IHP recommendation to retain the Character Area QM (thereby re-zoning the area MRZ), the Airport Noise QM would also apply here, the details of which are also part of an Alternative Recommendation.</p> <p>Please refer to 24 February 2025 report for all other relevant information.</p>
Modify Residential Pathways.	<p>This is not a qualifying matter but rather a product of the IHP’s interpretation of the High Court precedent on s80E.</p> <p>Please refer to 24 February 2025 report for all other relevant information.</p>

¹⁹ S42A report of [Suzanne Richmond](#), Christchurch City Council, 11 August 2023. Specifically, paragraphs 8.1.44 and 8.1.47.

Lastly, it is noted that the evidence summaries included in the 24 February report made reference to the Consult24 webpage to search submissions. This webpage is no longer available and all submission materials are now instead available on the [PC14 webpage](#) under the 'Submissions' heading at the end of the page.

Please do not hesitate to contact Council should you require any further information.

Ngā mihi nui,

A handwritten signature in blue ink that reads "Mark Stevenson". The signature is written in a cursive style with a horizontal line across the middle of the name.

Mark Stevenson, Acting Head of Planning and Consents
Christchurch City Council
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