

## **Before the Independent Hearings Panel**

**In the Matter of**                    the Resource Management Act 1991

**And**

**In the Matter of**                    the Canterbury Earthquake (Christchurch Replacement District Plan) Order 2014

**And**

**In the Matter of**                    of the Proposed Christchurch Replacement Plan: **Chapter 7 Transport (Part)**

Brief of evidence of Philippa Alison Lynch for Te Ngāi Tūāhuriri Rūnanga, Te Hapū o Ngāti Wheke, Te Rūnanga o Koukourārata, Ōnuku Rūnanga, Wairewa Rūnanga, Te Taumutu Rūnanga and Te Rūnanga o Ngāi Tahu [1145 and FS 1448]  
Dated: 9 June 2015

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**Lane Neave**  
LAWYERS

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## Introduction

1. My name is Philippa Alison Lynch.
2. I hold the qualifications of Master of Applied Science in Environmental Management from Lincoln University, and Bachelor of Science from the University of Canterbury. I am an associate member of the New Zealand Planning Institute and an accredited RMA hearings commissioner.
3. I have worked in resource management for over 12 years. I am a Senior Environmental Advisor at Te Rūnanga o Ngāi Tahu. Previously I worked for Environment Canterbury as a resource consent planner.
4. In preparing my evidence I have reviewed:
  - (a.) The evidence in chief on behalf of the Christchurch City Council (**the Council**);
  - (b.) The Land Use Recovery Plan (**LURP**);
  - (c.) The Canterbury Earthquake Recovery Strategy (**CERS**);
  - (d.) The Natural Environment Recovery Programme for Greater Christchurch (**NERP**) which forms part of the Recovery Strategy for Greater Christchurch/Te Mahere Haumanutanga o Waitaha;
  - (e.) The Canterbury Regional Policy Statement (**CRPS**), particularly Chapter 5: Land Use and Infrastructure and Chapter 6: Recovery and Rebuilding of Greater Christchurch.
  - (f.) The Canterbury Earthquake (Christchurch Replacement District Plan) Order 2014, including the Statement of Expectations in Schedule 4;
  - (g.) The New Zealand Standard 4121:2001 Design for Access and Mobility Buildings and Associated Facilities, particularly where it relates to car parking for those with limited mobility; and
  - (h.) Mahaanui – Iwi Management Plan 2013, which in terms of section 74(2A) of the Resource Management Act 1991 is a relevant planning document recognised by the iwi authority.

5. I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note (updated 1 December 2014) and I agree to comply with it. My qualifications as an expert are set out above. I confirm that the issues addressed in this statement are within my area of expertise except where I state that I am relying on information provided by another party. I have not knowingly omitted to consider material facts known to me that might alter or detract from the opinions expressed.
6. I note that whilst I am employed by Te Rūnanga o Ngāi Tahu, I am bound by the Code of Conduct and the professional ethics of the New Zealand Planning Institute, and I am required to be impartial and unbiased in my professional opinions expressed.

### **Submission**

7. Te Ngāi Tūāhuriri Rūnanga, Te Hapū o Ngāti Wheke, Te Rūnanga o Koukourārata, Ōnuku Rūnanga, Wairewa Rūnanga, Te Taumutu Rūnanga and Te Rūnanga o Ngāi Tahu (**Ngāi Tahu**) sought amendments to Chapter 7 Transport (Part) of the Replacement District Plan (**the Plan**) that sought to:
  - (a) Ensure the inclusion of all members of the community in public places, including kaumātua and those with mobility impairment.
  - (b) Ensure more emphasis is placed on accessibility to commercial and community facilities with an aging population.
  - (c) Ensure that the development and operation of the transport network does not degrade but instead protects and enhances Ngāi Tahu cultural values including but not limited to: impacts on wāhi tapu, wāhi taonga, cultural landscapes and mahinga kai.

### **Assessment**

8. I consider that many of the amendments sought in the Ngāi Tahu submission to Chapter 7 (Transport – Part) in relation to mobility issues are addressed by the Building Act 2004 and New Zealand Standard 4121:2001 Design for Access and Mobility Buildings and Associated Facilities, and consequently I consider that these matters do not need to be progressed in relation to provisions in the Plan.

9. I support the amendments sought by Ngāi Tahu that seek to ensure that the road network connects people and places (7.1.1.1 Policy 1 – Establishment of a road classification system) and that seek to ensure Ngāi Tahu cultural values are not degraded by instead protected and enhanced by the development and operation of the transport network (7.1.1.8 Policy 8 – Effects from transport infrastructure).
10. I have reviewed the revised Transport Chapter dated 14 May 2015 and I support the wording proposed by the Council to 7.1.1.1 Policy 1 and 7.1.1.8 Policy 8 to address the relief sought by Ngāi Tahu. I consider this wording does address the relief sought in the Ngāi Tahu submission. In my view, these amendments achieve the purpose of the RMA, give effect to the CRPS and are consistent with the LURP, CERS and the NERP.
11. I attended the ‘Objectives and Policies’ Transport Chapter mediation session. I am not aware of any discussions at mediation on the revised Transport Chapter dated 14 May 2015 regarding amending other parts of the wording of 7.1.1.1 Policy 1 and 7.1.1.8 Policy 8 that will impact on the relief sought in the Ngāi Tahu submission.
12. I am aware of the proposal by several submitters (as contained in the “submitter version” of the High Traffic Generator provisions attached to the mediation minute date 9 June) to remove the reference to Ngāi Tahu Manawhenua values in 7.1.1.2 Policy 2, and the assessment matters in 7.3.19. The removal of these references does not impact on the overall relief sought in the Ngāi Tahu submission due to this relief being provided for within the wording of 7.1.1.8 Policy 8(b) of the revised Transport Chapter dated 14 May 2015 and as such I do not consider the relief sort by these submitters will impact on the overall relief sort in the Ngāi Tahu submission.

A handwritten signature in blue ink that reads "P.A. Lynch". The signature is written in a cursive style with a large initial "P" and "L".

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**Philippa Alison Lynch**

**9 June 2015**