

Submission ID	Do you have any comments on the proposed lighting upgrade?	Do you support the lighting upgrade?	Please provide comments either in support or opposition of the lease application by Halswell RLFC for a pavilion rebuild at Halswell Domain	Do you support the lease application?	First name	Last name
33132	<p>I have read and totally agree with the submission made by Tony Nikkel</p> <p>My main concern is that you want to put 18m light poles on to the main "number one" field. The effect of the glare and extra light that will be directed toward our property is not acceptable in our view. They will be visually intrusive by being above the existing tree line.</p> <p>I do not disagree with the upgrade with the buildings nor with upgrading the "number two" field as these lights appear to be within the existing tree lines.</p>	No	<p>I have read and totally agree with the submission made by Tony Nikkel</p> <p>We support the upgrade to the pavilion as long as the matter of the lighting upgrade is addressed as discussed by Tony Nikkel.</p>	Yes	Paul and Joy	Macaulay
33126	<p>I am opposed to the lighting proposal.</p> <p>While the application consultation is not structured for hearing panel on this part of the proposal, I respectfully submit that it would be appropriate to be heard for the following reasons; due to Covid-19 restrictions, the difficulty in accessing application information and the fact that the consultation public meeting on 2 April 2020 was cancelled.</p>	No	<p>I am in support of the Lease Application, however my support is conditional.</p> <p>Please see the attached documents for my submission.</p>	Yes	Tony	Nikkel
33131	<p>Yes - please see our reservations explained in the attached file</p> <p>Halswell Residents Association</p>	Yes	Please see attached file	Yes	David	Hawke
33116		Yes		Yes	Graeme	Cook
33113	No negative comment - if the club needs the lights for practice, I fully support this proposal	Yes	The RLFC Halswell Club do an excellent job motivating young (and not so young) people in the district to keep fit and engage in a supportive group sport we/I fully support these changes to make the club more sustainable. We are in our 70's & our Parklea Ave property backs onto one of their fields - allowing us to watch the matches without leaving home. I/we fully support the lease application.	Yes	J	Rowden
33075	The lights will be a great improvement for the fields.	Yes	The pavilion will be a tremendous asset for all club members and visitors.	Yes	Rob	Turner
32806	Always a bit wary of these upgrades but tentatively ok with it	Yes	Makes a lot of sense	Yes	Keri	Hodgman
32804	It would be an awesome addition to the Halswell rugby league club and the Halswell and surrounding communities	Yes	We need something like this for the club as league is a winter sport and it would make things so much easier to see for supporters and photographers during the games!	Yes	Maygan	Neale
32800	This is definitely needed for training and night use of the club rooms	Yes	I think the new lease is a great idea	Yes	Kylie	Bettridge
32753	Bloody awesome idea! you can hardly see at trainings it's pretty dangerous sometimes	Yes	Club rooms at the moment are old and small be good to have them closer to the main field so there is better space for people to socialise and watch games	Yes	Brody	Greig
32751	I'm in support of local sports clubs	Yes	I support this	Yes	Janine	Robinson
32750	This would be great for trainings and even for games during the winter as it gets dark very and we need sufficient lighting to see what we are doing	Yes	We need a new clubrooms as ours is a little bit outdated and it would be nice to have something modern for the club members to enjoy	Yes	Caleb	Scott
32749	Happy for it to go ahead	Yes	Happy for it to go ahead they do positive stuff for the community	Yes	Daren	Diggs
32748	Huge improvement for the large volume of players, especially children, who in the past have trained at times in the dark.	Yes	Halswell League is a longer term resident of the Halswell domain. A new clubrooms to replaced the earthquake damaged one is well overdue.	Yes	Andy	Clark

32747	this would be awesome for the club and players involved	Yes	i support the lease application	Yes	Tirikatene	Taiuru
32746	Definitely need it for the league trainings	Yes	I support this to help continue to grow the league club and the community, with a good building for many different occasions.	Yes	Aaron	Fiveash
32745	Full support	Yes	Full support	Yes	Hamish	Spivey
32734	Fantastic, will enhance use of ground for the public	Yes	This looks like a great building to add to our facilities in Halswell	Yes	Andrew	Ellis
32732	I am happy for the lighting upgrade to occur	Yes	I am very happy for the rebuilding of the Halswell RLFC pavilion to occur	Yes	Ian	Southern
32723	Security cameras to reduce anti social behavior i.e. graffiti & more rubbish bins	Yes	Security cameras to reduce anti social behavior i.e. graffiti & more rubbish bins	Yes	Matthew	Shallcrass
32704	In our area, membership in the winter codes continues to increase causing major issues with overcrowding on fields that are already floodlit. Some fields are being used constantly so degrade quicker. The more floodlit areas there are the less overcrowding and we can introduce a rest period for fields. League have the same issues and we fully support them in their need for new floodlights Halswell United AFC	Yes	We are in support of the new lease and new building for HURFL	Yes	KEVIN	CLARKE
32691	Canterbury Rugby League (CRL) support the upgrade of lighting for the purpose of training and potentially night matches. Enhanced lighting on the playing fields provides a safer environment for players to train and play. CRL commends Halswell Rugby League for investing in upgrading lighting. Canterbury Rugby League Incorporated	Yes	Halswell Rugby League Football Club (HRLFC) is a respected Sports Club in the Canterbury Rugby League fraternity and its growing Halswell community. The HRLFC Club has been, and still is, consistently served by community minded leaders since its establishment in 1960. It offers sporting programmes for their junior football and multiple senior footballs teams both of which compete in the CRL weekly competitions with players and team staff often achieving representative honours. Off the field HRLFC provides a community Clubrooms, that includes other Halswell sports clubs, for committee meetings, socializing and community care. Since the Christchurch earthquakes this Halswell community sports hub was damaged and a replacement Clubrooms is needed to assist in the day to day functioning of a modern sports club and as an asset to the Halswell sporting community. CRL fully support a pavilion rebuild at Halswell Domain and commend the HRLFC on its efforts in the process.	Yes	Duane	Fyfe
33312	We support the lighting upgrade	Yes	The Halswell Tennis Club tabled and discussed the information at their Committee meeting held on 29 th April 2020 (due to no meeting held in March due to Covid 19). As the closest neighbours the Halswell Tennis Club Committee are very supportive of the Halswell Rugby League Club developments, including the lease renewal, building development and the lighting upgrade. The new building design looks a very good design and is in a suitable location. It will be a great asset to the continual improvement of the Halswell Community. We wish the Club all the best for their developments	Yes	Mike	Stopforth

Submission on Halswell Rugby League Football Club application

for:

Proposed new lease and pavilion rebuild, and sports field lighting upgrade.

Tony Nikkel
23 Hyde Place,
Halswell
24/04/2020

Proposed new lease and pavilion rebuild:

Overall support

In general, I am in support of the proposed new lease and pavilion building rebuild, however this support is subject to there being an assurance that the increased impacts of the sports field lighting upgrade are adequately addressed.

New Lease

The proposal to merge the leases is practical and will make ongoing administration of the combined new lease easier to manage. I am in full support of this part of the proposal.

Pavilion Building Upgrade

As depicted in the consultation document the proposed new building is aesthetically designed and sited in a practical location. The proposed new pavilion building will be an asset to both the club and local community.

In the consultation document it is noted that the design of the new pavilion building has taken environmental and visual impacts into account. The building has been specifically designed to be *"less visually intrusive"*, have a lower profile and to be *"more in keeping with the park like environment"*.

I am in full support of these design elements and the proposed new pavilion building being constructed as proposed.

** However, I cannot support the new pavilion building proposal if it is considered in isolation from the sports field lighting upgrade for the reasons discuss below.

Critical Matters to be Considered

The proposed location of the new pavilion building will require at least one existing light pole structure to be removed and this could be a trigger requiring the remaining light poles around the oval to be upgraded.

It is submitted that due to the increased visual impacts of the proposed lighting upgrade the lighting part of the application should be linked with and be assessed on the same basis as the new pavilion rebuild application.

It is my understanding that the proposed height of the new light pole structures is not in compliance with the Christchurch District Plan clause 18.4.2.4, where the maximum permitted height for these structures in the Open Space Community Parks Zone is restricted to 8 meters without a resource consent and associated assessment of environmental effects (AEE).

As such the environmental impact of the light pole structures has the potential to be significant and needs to be correctly addressed and assessed by the hearing panel in making any recommendations to the Community Board. Likewise, the Community Board in making its decisions needs to take into account any adverse effects of the proposals.

In Summary

I submit that the increased visual impacts of the lighting upgrade should be considered in conjunction with the application for the new lease and pavilion building upgrade, and not in isolation of each other.

Therefore, my submission on this part of the application is conditional as follows:

- a) I am in full support of the new lease and pavilion building upgrade, provided that:
 - i. the application is considered and approved in conjunction with the proposed sports field lighting upgrade, and
 - ii. the additional visual impacts of the lighting upgrade are properly addressed by an AEE prepared by a suitably qualified person in landscape design and are mitigated or minimised to be no more visually intrusive than the current situation,

however,

- b) I am opposed to the new lease and pavilion building upgrade:
 - i. if the application is considered in isolation and approved separately from the proposed sports field lighting upgrade, and
 - ii. if there is no proper assessment of the visual environmental effects of the lighting upgrade by way of an AEE prepared by a suitably qualified person in landscape design, and
 - iii. if the new light pole structures are higher than the existing light pole structures, resulting in more visually intrusive impacts than the current situation.

Sports field lighting upgrade:

Overall Non-Support

Overall, I am opposed to the proposed lighting upgrade proposal in its current form. I submit there has been a lack of clarity and potential for some ambiguity in the public consultation phase.

I am concerned that this lack of clarity and ambiguity may have resulted in some members of the public not being aware of the full impact of the proposal. Likewise, it is important that the Community Board has relevant and accurate information available before making any decisions.

I have not been able to sight a copy of the application documents due to Covid-19 restrictions. However, it would appear from the public consultation document that there may have been little consideration given to potential negative visual effects that could result from the proposed new light pole structures at 18 meters and 14 meters high as proposed.

Due to the lost opportunity to have the public discussion meeting planned for 2 April 2020, where I had hoped to clarify these matters. It is suggested the Community Board should pay extra attention to the possibility that negative visual landscape effects could result from the current proposal and to take these effects into account when making decisions on the proposal.

Background Information:

To help in my assessment of the proposal I requested information on the height of the existing light pole structures. To date the answers have been rough estimates and approximate. To be fair this has been hard for the applicant or council staff to verify due to the Covid-19 lockdown restrictions.

I am a qualified land surveyor. During my daily exercise walks, I have made my own measurements using a digital inclinometer and tape measure and determine the height of the poles to be as follows (see Figure 1 example):

- i. The existing three poles on the 'number two' playing field near Halswell Rd are 14 meters high.
- ii. Six of the existing eight poles around the 'number one' main playing field adjacent to the new pavilion are 12 meters high, with two of these poles being a little higher at approximately 13 meters high.
- iii. Please Note: The estimated accuracy in the above measurements is +/- 0.5meters, due to the equipment and process used.



Figure 1 – Typical digital inclinometer reading of a 12m pole on sports field number one.

Submission in two Sub-parts:

Because there are two different sets of light poles being proposed, I have split the consultation response into two parts being:

Part A - Submission on the proposed new 14-meter-high light poles on the 'number two' playing field, near Halswell Rd.

Part B – Submission on the proposed new 18-meter-high light poles on the 'number one' main playing field, adjacent to the proposed new pavilion building.

Part A - Submission on Proposed new 14-meter-high light poles on the 'number two' playing field.

Part A – Overall support:

In general, I am in support of this part of the proposal. My reasons for this are:

- a) The new poles will be no higher than the existing poles,
- b) The existing trees along Halswell road are higher on average than the proposed new poles and will screen most of the visual impacts of the poles from the public and other users of the domain.

Part A – Matters for Consideration:

Notwithstanding my above support, the Community Board may be obligated to take into account the requirements of the Christchurch District Plan with regard to the height restriction of new pole structures in excess of 8 meters in the Open Space Community Parks Zone.

The Community Board should note that the other sports field lighting in the Halswell Domain does not exceed 12 meters in height, including the sports field lighting for the football (soccer) fields behind the Te Hāpua Community Centre. This could suggest that it may be more appropriate, and consistent, to specify a maximum height limit of 12 meters for all proposed new light pole structures both under this submission Part A, and Part B discussed below.

It would appear from the documents available the applicant has not explained the reasons why 14-meter-high poles are proposed for this location, or whether other lower alternatives were considered to mitigate any potential adverse effects.

Part A – Submission Summary:

In summary I have no objection to this part of the proposal, provided the poles on the 'number two' playing field do not exceed 14 meters in height. However I would more strongly support a maximum height for the poles to be 12 meters in height for the consistency reasons discussed above.

Part B - Submission on Proposed new 18-meter-high light poles on the 'number one' main playing field.

Part B – Overall non-support:

I am opposed to this part of the sports field lighting upgrade proposal for the following reasons:

- 1) The proposed new poles at 18 meters high will be significantly higher than the current poles at 12 meters high. The scale of the increase is one-and-a-half times higher (x 1.5) than the current light poles.

Expressed in other words, the proposed poles will be 6 meters higher than the current ones.

- 2) The proposed new pole structures will be two-and-a-quarter times (x 2.25) the permitted maximum height of 8 meters under the District Plan.

Expressed in other words, the proposed poles will be 10 meters higher than the permitted maximum height.

- 3) The new poles will visually intrude into the skyline above the existing tree line and be significantly more visually intrusive into the existing landscape and create a greater sense of visual dominance than the current poles.

Please Note:

It is submitted that items 1 to 3 above, all represent a significant change to the current situation and need to be addressed by an appropriate and qualified assessment of the environmental effects (AEE) as required by the Resource Management Act.

- 4) While the consultation document does state the new poles are proposed to be 18 meters high, I submit it can be difficult for members of the public in general to visualise the reality of this.

The 3D visualisations shown in the consultation documents have not accurately represented the height of the proposed new light pole structures. The new light poles are depicted at less than half the proposed 18 meters height applied for. While this is not a deliberate action, it is an oversight in the preparation and presentation of the public consultation documents.

Figures 2 and 3 illustrate the significant scale error in the depiction of the light pole structures in the 3D visualisations. They are depicted at 6 metres and 8 meters in height instead of the proposed 18 meters. Figure 4 shows the estimated perspective viewpoints of the presented images to assist with interpretation of the overlaid information.

It is submitted that the consultation documents could be providing an inaccurate impression of what the completed project will look like. This graphical information appears to be ambiguous and contradictory to the written statements.

- 5) The consultation document states the proposed new lights comply with the rules for glare and light spill of the Christchurch District Plan. However, there is no mention that the heights of the proposed light pole structures do not comply with the permitted maximum height of 8 meters under the Christchurch District Plan.

It is submitted that the information in the consultation documents is incomplete and may be providing an inaccurate impression that the proposal is fully compliant with Christchurch District Plan. This is not the case and should be rectified. The district plan rules are discussed separately below.

Please Note:

It is submitted that items 4 and 5 above, demonstrate a lack of accuracy in the public consultation documents that have the potential to be ambiguous and open to different interpretations by members of the public and local community.

It is therefore submitted that the advisory hearing panel and Community Board need to be fully aware of the possibility of ambiguity in the consultation documents and to take this into consideration when providing advice or making any decisions in relation to both the pavilion building rebuild and associated sports field Lighting upgrade.

Part B - Inaccuracies in Consultation Visualisations:



Figure 2 – Consultation 3D visualisation which inaccurately depicts two of the proposed new poles from this perspective at 6 metres and 8 meters in height instead of 18 meters. *(Estimated heights have been overlaid)*



Figure 3 – Consultation 3D visualisation which does not show one of the new 18-meter-high poles that would be visible from this perspective. *(Estimated heights have been overlaid)*

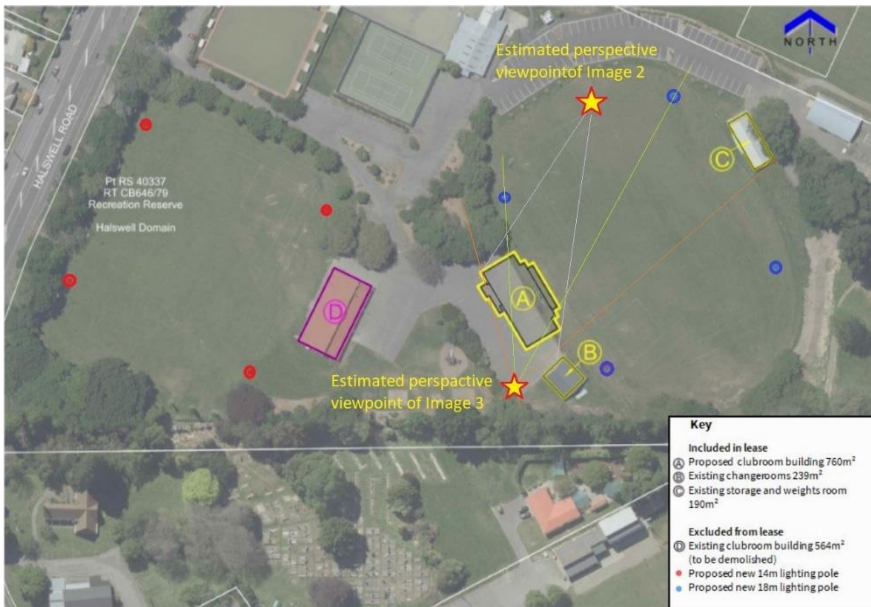


Figure 4 – Showing the estimated perspective viewpoints of Images 2 and 3. (Viewpoints have been overlaid)

Part A & B - District Plan Matters:

Part A & B - Compliance with Light Spill and Glare Rules

The public consultation document states that the proposed lighting upgrade meets the relevant 'Outdoor Lighting' glare and light spill standards of the Christchurch District Plan (CDP).

These 'Outdoor Lighting' standards are specified in chapter 6 and relate to the control of glare (clause 6.3.4) and light spill (clause 6.3.5).

From the light spill and luminance diagrams it would appear that the proposal complies with the light spillage requirements.

Under clause 6.3.4.1 P1(a) - the rule for glare control specifies that, "All fixed exterior lighting shall, as far as practicable, be aimed, adjusted and/or screened to direct lighting, away from the windows of habitable spaces of sensitive activities, other than residential units located in industrial zones, so that the obtrusive effects of glare on occupants are minimised.

Appendix 6.11.13 sub-clause 3 gives guidance on how light glare can be minimised by good design.

3. Where there is a risk of glare to a potential observer, the main beam angle should be directed at or below 70°.

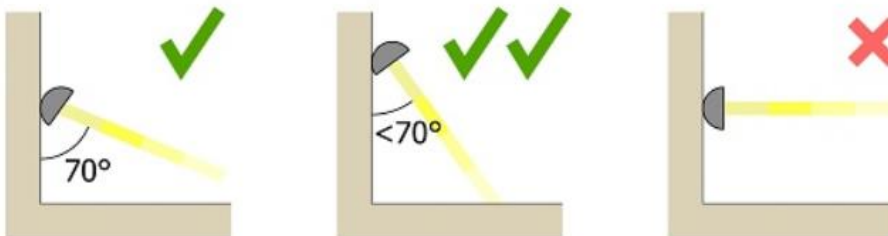


Figure 5 – Appendix 6.11.13 clause 3

I am aware that there are a small number of properties in Hyde Street that back on to the North boundary of Halswell Domain that could experience some visible glare from the proposed new lighting on sports field number one. (No.15 to No.21 of Hyde Place would be the most affected by any potential glare.)

While it is unrealistic to expect that there will be no glare from the proposed new lights, it is submitted that the amount of glare from the new lights can be minimised if the height of the lights above the ground is kept to a minimum.

Please Note:

It is submitted that if there are other valid reasons to keep the height of the light pole structures to a minimum, then these reasons will be further supported by the additional benefit that less glare will be generated as a result.

Part A & B - Non-compliance with 'Built Form' Rules

Chapter 18 of the Christchurch District Plan outlines the relevant provisions of the Open Space Community Parks Zone.

Clause 18.4.1.1 (Permitted activities) states that: *The activities listed below are permitted activities in the Open Space Community Parks Zone if they meet the activity specific standards set out in the following table and the built form standards in Rule 18.4.2.* (Emphasis Added)

The proposed pavilion building and sports field lighting would be considered a permitted activity under activity standard 18.4.1.1 P1 (Recreation activity and/or recreation facility), **subject to** complying with the built form standards.

Chapter 2 of the Christchurch District Plan defines a building as:

Building: means as the context requires:

a.) any structure or part of a structure, whether permanent, moveable or immovable; ..., but excludes...

i.) masts, poles, radio and telephone aerials less than 6 metres above mean ground level; ... (Emphasis Added)

Hence any pole over 6 meters in height is considered a building structure under Chapter 18.

The 'Built Form' Standard, clause 18.4.2.4(a)(i) states that the maximum height of any building other than excluded in sub-parts (ii) to (vii) shall be 8 meters.

Part A & B - Resource Consent Required:

It is submitted that the proposed light pole structures at 14 metres high (under Part A above) and 18 meters high (under this part B) are far in excess of the permitted maximum height of 8 meters and as such will require a resource consent to ensure all the relevant environmental impacts, including visual impacts, are properly assessed and mitigated where possible.

The requirement for a resource consent is backed up by a recent professional planning opinion related to other lighting non-compliances in the Halswell Domain Open Space Community Parks Zone.

Part A & B - Matters of Discretion:

Clause 18.10.17 specifies critical environmental impact criteria that must be considered in assessing an application for discretionary resource consent approval.

Clause 18.10.17 Matters of Discretion – Building Height

Matter of discretion to be assessed	Submitted relevance to Sports field lighting upgrade
<p><i>a. The extent to which the increased building height will result in:</i></p> <ul style="list-style-type: none"> <i>i. visual dominance;</i> <i>ii. loss of privacy and outlook for adjoining residents;</i> <i>iii. incompatibility with the character and scale of buildings within and surrounding the site;</i> <i>iv. adverse visual effects that are mitigated by landscaping. Reference should be made to General Rules and Procedures, Appendix 6.11.6, Part B for guidance and information on tree species.</i> 	<ul style="list-style-type: none"> • The increase in height from both the current pole height and the permitted pole height is significant. • 18m high poles will be visually dominant. • 18m high poles are not consistent with the scale of other 12m poles elsewhere in the Halswell Domain and out of character with the surrounding tree line. • The proposal has not addressed any mitigation strategies to address the negative impacts.

Matter of discretion to be assessed	Submitted relevance to Sports field lighting upgrade
<p>b. Whether the increased building height will result in any benefits in terms of retention of open space, significant trees or the satisfaction of specialised recreational needs.</p>	<ul style="list-style-type: none"> • There appears to be no benefit in terms of retention of open space or significant trees. • The specialised recreational needs would need to be specified and be compatible with the objectives and policies of the Open Space Community Parks Zone to be considered relevant. • If there are any benefits they will need to be weighed up against any adverse negative effects.
<p>c. Whether the development is designed and laid out to promote a safe environment and reflects the principles of Crime Prevention through Environmental Design (CPTED).</p>	<ul style="list-style-type: none"> • It is unlikely this provision is relevant. • The sports field lighting will only be switched on for limited periods of time. • There is already sufficient cycleway and carpark lighting in the area of the proposal to meet the objective of crime prevention.

Please Note:

In the consultation document it is noted that the design of the new pavilion building has taken environmental and visual impacts into account. It states that the building has been specifically designed to be “less visually intrusive”, have a “lower profile” and to be “more in keeping with the park like environment”.

It is submitted this same level of environmental assessment needs to be applied to the 18m high light pole structures.

Part B – Submission 3D-Visualisations:

To illustrate some of the negative visual adverse effects this submission addresses I have marked up the following 3D visualisations. They are shown as Figures 6 to 9.

The visualisations are approximate, but have been prepared to the best of my ability with the tools I have at hand. The scale of the proposed 18m poles is based on a multiplier of 1.5 times the height of the existing 12-meter-high poles.

Part B – Submission Summary:

In summary I oppose the proposal for 18-meter-high light poles around the ‘number one’ playing field for the reasons expressed above.

I submit that:

- a) it would appear the consultation documents have not accurately depicted the full extent of the impact of the sports field lighting upgrade. This has the potential for ambiguity that the hearing panel and the community board need to pay close attention to in making any recommendations or decisions,
- b) there appears to be a lack of environmental assessment into the visual impacts of the 18-meter-tall structures in the Open Space Community Parks Zone and it also appears that no mitigating strategies or alternate options have been considered or proposed,
- c) the proposal for 18m and 14m high light poles is non-compliant with the ‘Built Form’ standards of the Christchurch District Plan, and in particular clause 18.4.2.4(a)(i), which in the context of the application restricts the maximum height of any building structure to 8 meters in height.

I would be happy to discuss and clarify any of the content of this submission with the hearing panel.

Tony Nikkel



Figure 6 – Looking across the field in a SE direction - Current 12m poles (green).

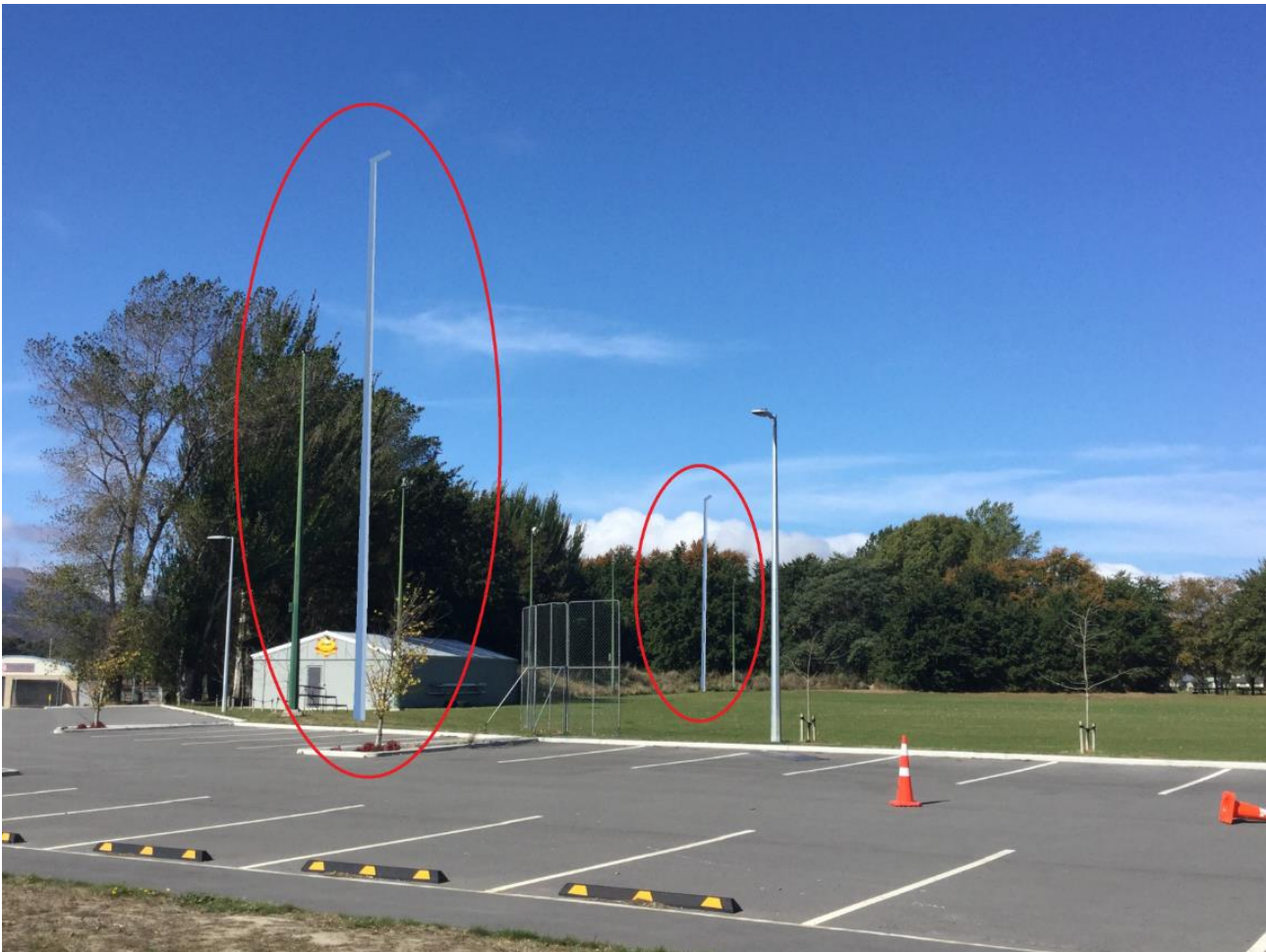


Figure 7 – Looking across the field in a SE direction – Proposed 18m poles highlighted.



Figure 8 – Looking across the field in a S direction - Current 13m poles (green).

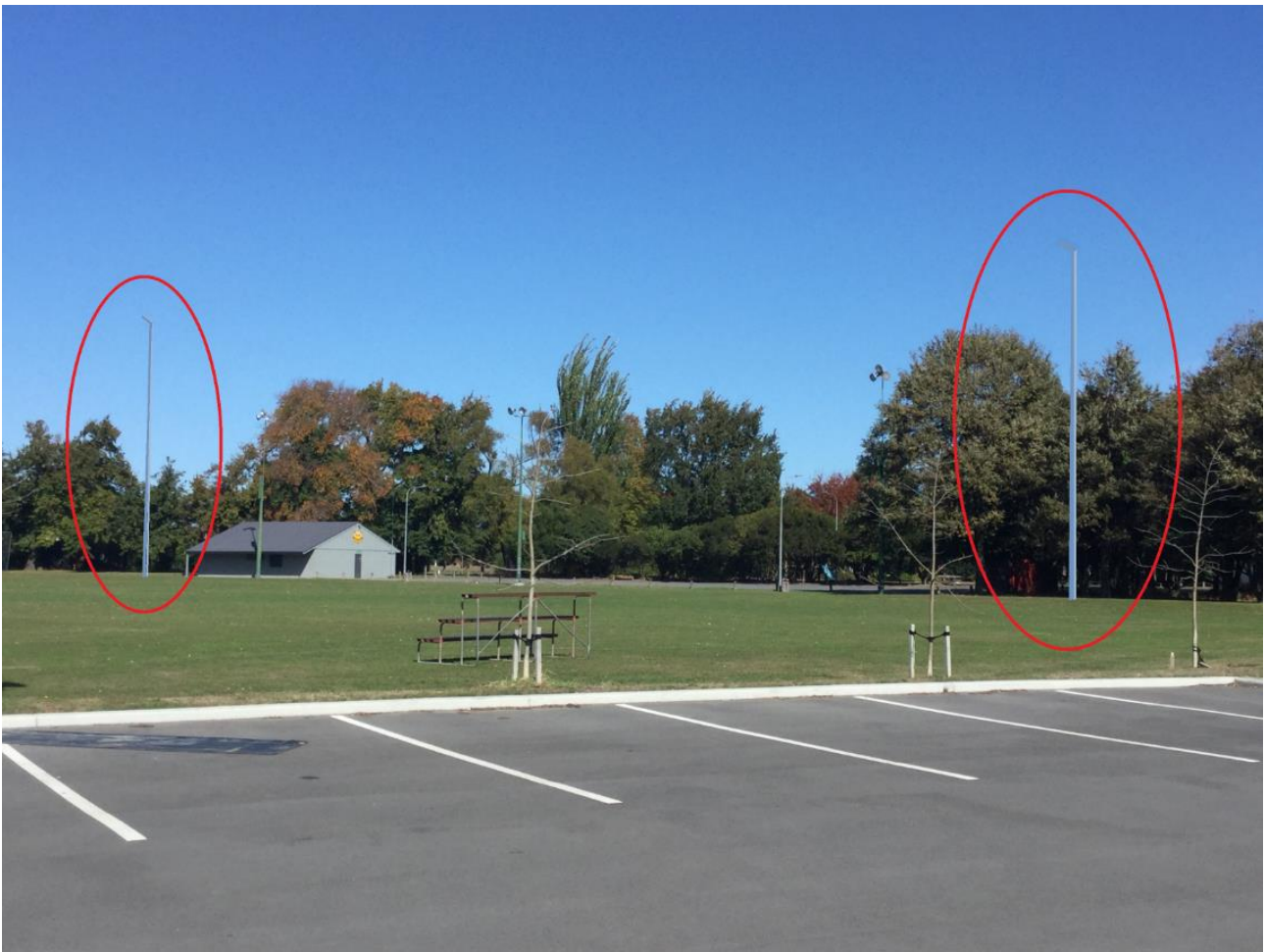


Figure 9 – Looking across the field in a S direction - Proposed 18m poles highlighted.



Halswell
RESIDENTS ASSOCIATION (inc)

The Chairman:
448 Wigram Road,
CHRISTCHURCH, 8025

Submission: Halswell Rugby League Football Club application

Date: 26 April 2020

Wish to be heard: Yes

Standing: Halswell Residents Association (Inc.) is an incorporated society and a registered charity, and advocates for the interests of people in Halswell. Activities are largely carried out by a Committee of 6-8 members, which holds monthly meetings open to the public. For submissions such as this, a draft is circulated to our committee before the final version is submitted and minuted at the next monthly meeting. The Association Chairperson is John Bennett; the Secretary is David Hawke and the Treasurer is Matthew Shallcrass. The Association can be contacted by email at secretary.HRA@gmail.com

Support for the concept of the rebuilding project at Halswell Domain

- Rugby league is an important sports code for young people in Christchurch, and it has an admirable emphasis on the value of participation in team sport.
- From our observations, the club has been a good tenant at Halswell Domain, with no complaints coming to us about amenity issues.
- We therefore support the proposed rebuilding project and the associated lease arrangements.

The question of the lighting towers

- Some concern has been expressed to us about the height of the lighting towers and the potential for effects on neighbours, although we note the tight limits proposed for their operation and their compliance with the District Plan. These time limits must not be changed at some future time without full consultation; it cannot be an administrative decision.
- We note that playing field lighting towers at Nga Puna Wai are similar in height but that there are more of them for each playing field. Similarly to the question of hours of operation, any change to the number of towers at Halswell rugby league's site must be preceded by full consultation.

Looking to the future

- We understand that Halswell Playcentre is looking for new premises, having outgrown its present site. One possibility might be for them to use the piece of ground presently occupied by the league clubrooms (Building D in the consultation plan), and we would tentatively support this possibility.