

**OFFICER'S REPORT FOR:**

**Hearings Panel:**

**SUBJECT:**

**Proposed Waimakariri District Plan: Special Purpose Zone – Rangiora Airfield ('SPZ(RA)')**

**PREPARED BY:**

**Bryce Powell, Consultant Planner**

**REPORT DATED:**

**20 June 2024**

**DATE OF HEARING:**

**Stream 12F – 19-27 August 2024**



**WAIMAKARIRI**  
DISTRICT COUNCIL

## Executive Summary

1. This report considers a submission received by the Council on the notified Proposed District Plan (Proposed Plan) to zone land Special Purpose Zone – Rangiora Airfield (SPZ(RA)) from Rural Lifestyle zone (RLZ). There were no further submissions that related to this topic.
2. The submitter has requested that the land be rezoned to SPZ(RA) to provide for the ongoing operation and development of the Rangiora Airfield and to provide for land uses that are related or ancillary to the operation of the airfield. This includes commercial, industrial, and residential activities. No changes are proposed to the existing airfield designation (WDC-1) or the related 65 dBA LN noise contours that impose restrictions on noise sensitive activities (WDC-2).
3. The submitter has provided a proposed planning framework for the SPZ(RA) and has also outlined various amendments to district-wide provisions of the Proposed Plan that are necessary to ensure that the district-wide provisions are aligned with the SPZ(RA). This information was provided in evidence following the further submission process and generally builds upon the limited information that was provided in the submission. The proposed SPZ(RA) provisions are supported by technical evidence and a section 32 analysis has been prepared by the submitter's planning expert.
4. It is considered that the extent and density of the residential activities enabled by the proposed SPZ(RA) provisions fall outside the scope of what had been sought by the original submission and, in my view, these activities need to be scaled back to something that is more akin to, or a natural consequence of, what had been proposed in the submission for the Hearings Panel to consider the matter further. The following activities were found to fall outside the scope of the submission:
  - a) The extent and intensity of residential activities within Area A.
  - b) The intensity of residential activities within Area B (including the minimum 5,000m<sup>2</sup> lot size).
5. It is my view that, as a concept, the SPZ(RA) provisions that are within the scope of the submission **could** support the operation and development of the airfield and align with National Policy Standard – Urban Development and the Canterbury Regional Policy Statement prepared under the RMA. However, in my evaluation, the SPZ(RA) provisions are not the most appropriate way of achieving the objectives of the Proposed Plan and the purpose of the RMA and they require further considered review to avoid unintended or poor development outcomes.
6. As drafted, the proposed SPZ(RA) provisions cannot adequately manage the scale and intensity of land use activities in an appropriate manner, and the framework would provide little opportunity for the Council to assess cumulative effects on the landscape and the transportation environment. In the absence of such controls, there would also be an over-reliance on the proposed definition of “airfield activities”, and its interpretation, to ensure that the nature and scale of business activities relate to, or are ancillary to, the operation of the airfield and do not undermine the purpose of the SPZ(RA).

7. I recommend that further information is provided by the submitter on the future vision for the airfield and its role within the Canterbury Region, supported by economic and market analysis that can inform the future growth of airfield activities and the amount of land needed to support that growth. A better understanding of the growth scenarios for the airfield will then enable the scale of 'related' or 'ancillary' activities to be more robustly considered and for the potential adverse effects of these activities to be fully evaluated.
8. I cannot recommend support for the SPZ(RA) in its current form. The relief sought by the submitter:
  1. Would not achieve the purpose of the RMA where it is necessary to revert to Part 2 and otherwise give effect to higher order planning documents, in respect to the proposed objectives; and
  2. Would not achieve the relevant objectives of the Proposed Plan, in respect to the proposed provisions.

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## Interpretation

9. Parts A and B of the Officer's reports utilise a number of abbreviations for brevity as set out in **Error! Reference source not found.** and Table 2 below:

**Table 1: Abbreviations**

Abbreviation	Means
RMA	Resource Management Act 1991
District Council	Waimakariri District Council / territorial authority
Operative Plan	Operative Waimakariri District Plan
Proposed Plan	Proposed Waimakariri District Plan
ECan	Environment Canterbury/Canterbury Regional Council
CRPS	Canterbury Regional Policy Statement
GRZ	General Rural Zone
IPI	Intensification Planning Instrument
ITA	Integrated Traffic Assessment
JWS	Joint Witness Statement
NES	National Environmental Standard
CDWPZ	Community Drinking Water Protection Zone
NESCS	National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health 2011
NPSIB	National Policy Statement – Indigenous Biodiversity 2023
NESF	National Environmental Standards for Freshwater 2020
NESPF	National Environmental Standards for Plantation Forestry 2017
NESDW	National Environmental Standards for Sources of Drinking Water 2007
cLWRP	Canterbury Land and Water Regional Plan
NPS	National Policy Statement
NPSHPL	National Policy Statement on Highly Productive Land 2022
NPSFM	National Policy Statement for Freshwater Management 2020
NPSUD	National Policy Statement on Urban Development 2020
GCSP	Greater Christchurch Spatial Plan
ODP	Outline Development Plan
OPW	Outline Plan of Works
RPS	Operative Canterbury Regional Policy Statement
RLZ	Rural Lifestyle Zone
SPZ(RA)	Special Purpose Zone (Rangiora Airfield)

# 1 Introduction

## 1.1 Purpose

10. The purpose of this report is to provide the Hearings Panel with a summary and an analysis of the submission by Daniel Smith (Submission #10) to rezone 106.08ha of land in the vicinity of the Rangiora Airfield from Rural Lifestyle zone (RLZ), as proposed in the notified Proposed District Plan (Proposed Plan), to Special Purpose Zone – Rangiora Airport (SPZ(RA)). The SPZ(RA) would be a new, bespoke zone in the Proposed Plan, the purpose of which is to enable the continued operation and development of the Rangiora Airfield. The submitter also proposes minor amendments to some of the district-wide chapters of the Proposed Plan so that they align with the outcomes for the SPZ(RA). These have also been summarised and analysed within this report.
11. Council did not receive further submissions on this topic but did receive one submission that sought to retain the RLZ zoning of the Rangiora Airfield in the Proposed Plan (Z Energy [286.12]). This Z Energy submission is addressed in paragraphs 46-48 of this report.
12. This report is prepared under section 42A of the Resource Management Act 1991 (RMA) and responds to the key issues that have emerged from the submission. The report responds to the key issues that have emerged from the submitter's zoning proposal and considers the proposal in relation planning documents that have been prepared at national, regional and district levels. This includes the Proposed Waimakariri District Plan (Proposed Plan).
13. Insufficient information has been provided to support the requested rezoning provisions, and therefore I cannot recommend whether the Hearings Panel should grant relief to the submitter, and I have not recommended any consequential amendments to the SPZ(RA) provisions proposed by the submitter. However, throughout the body of the report I have made suggestions that the submitter and Hearings Panel may wish to consider. These suggestions have been made without prejudice and have been informed by the evaluation undertaken by the author and the technical information provided by those listed in Section 1.3 of this report, which is appended to this report. In preparing this report the author has had regard to recommendations made in other related s42A reports.
14. This report is provided to assist the Hearings Panel in their role as Independent Commissioners. The Hearings Panel may choose to accept or reject the conclusions and recommendations of this report and may come to different conclusions and make different recommendations, based on the information and evidence provided to them by submitters.
15. This report is intended to be read in conjunction with Officers' Report: Part A – Overview which contains factual background information, statutory context and administrative matters pertaining to the district plan review and Proposed Plan.

## 1.2 Author

16. My name is Bryce Powell. My qualifications and experience are set out in **Appendix B** of this report.



17. My role in preparing this report is that of an expert planner.
18. I have not been involved in the preparation of the Proposed Plan and I have not authored Section 32 Evaluation Reports for any of the Proposed Plan topics.
19. Although this is a District Council Hearing, I have read the Code of Conduct for Expert Witnesses contained in the 2023 Practice Note issued by the Environment Court. I have complied with that Code when preparing my written statement of evidence and I agree to comply with it when I give any oral evidence.
20. The scope of my evidence relates to the request to rezone RLZ land in the vicinity of the Rangiora Airfield to SPZ(RA), as sought by Submitter [10] (Daniel Smith). I confirm that the issues addressed in this statement of evidence are within my area of expertise as an expert policy planner.
21. Any data, information, facts, and assumptions I have considered in forming my opinions are set out in the part of the evidence in which I express my opinions. Where I have set out opinions in my evidence, I have given reasons for those opinions.
22. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

### 1.3 Supporting Evidence

23. The expert evidence, literature, legal cases or other material which I have used or relied upon in support of the opinions expressed in this report includes the following:
  - John Aramowicz (Council's Senior Civil and Geotechnical Engineer) on behalf of the Council's Development Planning Unit on servicing and natural hazards (Evidence provided in **Appendix I**);
  - Technical evidence prepared on behalf of WDC by Mark Gregory (Principal Transportation Planner at WSP), Mark Lewthwaite (Acoustic Engineer at Powell Henwick Ltd), and Hugh Nicholson (Landscape Consultant at UrbanShift NZ). These are provided as **Appendix E**, **Appendix F** and **Appendix G** respectively;
  - Technical evidence provided by the submitter<sup>1</sup>;
  - Legal opinion prepared by Cavell Leitch Limited on 22 November 2023<sup>2</sup> on behalf of the Council (as landowner) and Buddle Findley Limited on 16 April 2024 on behalf of Council's Development Planning Unit (provided as **Appendix D**); and
  - The planning decision on Private Plan Change 45 and the Notice of Requirement for Rangiora Airfield dated September 2020.<sup>3</sup>

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<sup>1</sup> All evidence provided by the submitter is available on the Council website under [Hearing Stream 12F Airfield](#)

<sup>2</sup> The legal opinion from Cavell Leitch is provided as appendix 2 on page 53 of [Mr Chrystal's Evidence](#)

<sup>3</sup> A copy of the [decision for Plan Change 45 and Notice of Requirement](#)

## 1.4 Key Issues in Contention

24. There was only one submission that sought to rezone land in the vicinity of the Rangiora Airfield from RLZ in the Proposed Plan to SPZ(RA) ([10] from Daniel Smith). Council received no further submissions on this topic, but did receive a submission from Z Energy Limited [286.12] who sought to retain the RLZ zoning of the Rangiora Airfield.
25. I consider the following to be the key issues in contention with respect to the relief sought by Mr. Smith in [10] to be as follows:
  - a. Whether the full extent of the changes that have been requested to the Proposed Plan can be considered within the scope of the original submission, and the degree to which the changes sought introduce issues of procedural fairness;
  - b. Whether it is reasonable to grant the relief sought by the submitter without also altering designations WDC-1 (Airfield Purposes) and WDC-2 (Noise Contours) at the same time;
  - c. Whether the scale of development and the range of activities enabled by the changes are sufficiently aligned with airfield activities, and whether it has been adequately demonstrated that the activities would be ancillary to the primary airfield activity and support the operation and development of the Rangiora Airfield as a strategic asset of local and regional significance;
  - d. Whether the proposed zoning gives effect to the directive provisions of Chapter 6 of the CRPS as the land is outside of existing urban areas, greenfield priority areas or FUDAs as identified in the CRPS Map A;
  - e. Whether the SPZ(RA) land is within the “urban environment” and contributes significantly to development capacity and achieving a well-functioning environment (as required by the NPSUD);
  - f. Reverse-sensitivity issues related to establishing activities that are sensitive to noise close to an airfield and the industrial and commercial activities that will be enabled by the SPZ(RA) zone;
  - g. The adequacy of the Proposed Plan district-wide provisions to manage transportation related effects;
  - h. Whether effects on the landscape and rural amenity resulting from the enabled intensity of activities and built form can be adequately avoided and mitigated by the proposed SPZ(RA) provisions and district-wide Proposed Plan provisions;
  - i. Whether there is a sufficient level of confidence that the SPZ(RA) can be adequately serviced, based on the available information and the SPZ(RA) provisions; and
  - j. Whether the potential effects from natural hazards (flooding) can be appropriately mitigated through the SPZ(RA) planning framework and the district-wide Proposed Plan provisions.
26. I address each of these key issues in this report.

## 1.5 Consideration of submission

### 1.5.1 *Matters addressed in this report*

27. This report considers the request by Daniel Smith to rezone land from RLZ (as proposed in the Proposed Plan), to (SPZ(RA)), as set out in submission [10] and the supporting technical evidence provided to the Council in March 2024. There were no other submitters who sought a similar outcome and there were no further submissions that related to the SPZ(RA). Submission [286.12] by Z Energy Limited did seek to retain the RLZ and designation WDC-1 that applies to the Rangiora Airfield, and this is addressed in paragraphs 46-48 of this report.
28. This report does not analyse whether the RLZ provisions are appropriate for the land subject to the submission. This topic is covered in separate s42A reports that were considered in earlier hearings. It is my understanding that there were no other submitters who sought a different rural zoning to the RLZ for the Rangiora Airfield and adjacent landholdings.
29. This report does not consider the appropriateness of rezoning land to the east of Merton Road to SPZ(RA), as was shown in the plan referenced "SPARZ 001" that accompanied submission [10]. Paragraph 24 of Mr. Chrystal's planning evidence prepared on behalf of Mr. Smith confirms that this land is now excluded from their zoning request.
30. This report does not consider any changes to the extent of the designations referenced WDC-1 (airfield purposes) and WDC-2 (noise contours) in the Proposed Plan. Paragraph 29 of Mr. Chrystal's planning evidence states that the requiring authority (Waimakariri District Council) will need to alter these designations independently of the consideration of the submitter's zoning proposal. Although I consider that a concurrent NoR and plan change process would provide a better opportunity to consider the requirements of the SPZ(RA) to support the strategic airfield and the role that it serves within a regional context, I have assessed the proposal in the context of the relief sought<sup>4</sup>.

### 1.5.2 *Report Structure*

31. In accordance with Clause 10(3) of Schedule 1 of the RMA, I have undertaken the following evaluation on both an issues and provisions-based approach.
32. As there were no further submissions received with respect to Mr. Smith's proposal, there has been no need to group submissions points based on topic. In accordance with Clause 10(2)(a) of Schedule 1 of the RMA.
33. I have recommended no consequential amendments to the submitter's SPZ(RA) proposal as there is insufficient information to make a recommendation.
34. This report only addresses definitions that are specific to this topic. Definitions that relate to more than one topic have been addressed in Hearing Stream 1.

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<sup>4</sup> See paragraphs 115-155 of my evidence.

## 1.6 Procedural Matters

### 1.6.1 Clause 8AA meetings

35. At the time of writing this report there have not been any pre-hearing conferences, clause 8AA meetings or expert witness conferencing in relation to submissions on this topic.

### 1.6.2 Intensification planning instruments (IPIs)

36. I understand that there are no submissions on Variation 1 to the Proposed Plan that relate specifically to the zoning of Rangiora Airfield and surrounding landholdings that could lead to issues of natural justice and fairness. Changes proposed by Variation 1 to the general or district-wide provisions to implement the NPSUD will be assessed in a separate s42A report.
37. With respect to the IPIs, it is noted that the land that is subject to this rezoning request is also subject to the existing 55dB noise contour overlay, which is a qualifying matter within Variation 1 as it applies 'relevant residential zones'.
38. I understand that neither the RLZ nor the proposed SPZ(RA) are a 'relevant residential zone'. Policy 3 of the NPSUD is not relevant to the SPZ(RA). Accordingly, I have not considered this matter further.

### 1.6.3 Joint Witness Statement – Urban Environment (Planning)

39. I note that the application of NPSUD term "urban environment" in the context of the Canterbury region was the subject of pre-hearing conferencing, with the outcomes of the conferencing documented within two Joint Witness Statements (Day 1 and Day 2).<sup>5</sup>
40. I have read the JWS documents and understand that the experts could not agree on whether Map A of the Canterbury Regional Policy Statement (CRPS) that defines the "urban areas" of Greater Christchurch also defines the "urban environment" of Greater Christchurch for the purposes of the NPSUD and as referred to in the explanation of Policy 6.2.1a of the CRPS.
41. In my view, the matters that were discussed in the pre-hearing conferencing are not relevant to the Hearing Panel's consideration of the SPZ(RA) and the relief sought by the submitter. This is because the submitter seeks a bespoke land use zoning to support the strategic function of the airfield. The submitter is not arguing that the land is within an urban environment or requesting an urban zoning to increase the district's residential or business capacity more generally. This matter is considered further under the NPSUD in paragraphs 203-212 of this report and under Chapter 6 of the CRPS in paragraphs 212-220 of this report.

### 1.6.4 Priors Road realignment and road-stopping process

42. The relief sought by the submitter is contingent upon Priors Road being straightened from its current 'kinked' alignment and widened to a sealed 11m width<sup>6</sup>. The realignment of

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<sup>5</sup> The joint witness statement on what is urban development is publicly available on the Council website - [Day 1](#) and [Day 2](#)

<sup>6</sup> This is illustrated in Figure 10 of this report.

Priors Road is authorised by subdivision consent RC215364<sup>7</sup>. The applicant specified their intention was that the existing section of Priors Road along the frontage of Lots 18 – 21 of the proposed subdivision would be subject to a future road stopping application and conversion to a Right of Way. This is discussed further in section 3.1.3 of this report.

43. Insufficient information has been provided by the submitter to understand whether subdivision R215364 has been given effect to, or whether the Council has initiated the road stopping process under Schedule 10 of the Local Government Act 1974<sup>8</sup>. This process would occur independent of the district plan review and may not occur ahead of the consideration of [10].
44. The northern edge of realigned Priors Road legal road corridor would form part of the southern boundary of the SPZ(RA). Land south of the realigned Priors Road would continue to be zoned RLZ under the Proposed Plan. Presumably, if the subdivision is not completed, the land would be split zoned SPZ(RA) and RLZ.
45. The realignment and widening of Priors Road authorised by RC215364 was considered in the submitter's Integrated Traffic Assessment (ITA) as part of the existing / consented environment. Further information is required to understand whether the widening and realignment of Priors Road are critical to consideration of the zoning proposal. The submitter has not proposed any changes to the Proposed Plan that would make the realignment and widening of Priors Road a prerequisite work to using or developing land within SPZ(RA).

#### **1.6.5 Z Energy Submission (Submission 286.12)**

46. Z Energy [286.12] outlined that they hold a neutral position on whether the site is zoned RLZ, though indicated that they sought to retain the RLZ zoning. They also support the rollover of the existing airfield designation (WDC-1), without modification.
47. The proposed zoning would also provide for fuel pump facilities as an "aircraft activity" related to or ancillary to the operation and development of the airfield. No changes are proposed to designation WDC-1.
48. There were no other submissions received that related specifically to the airfield site or the land adjacent land that is subject to the submitter's zoning proposal.

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<sup>7</sup> A copy of resource consent decision R215364 is in Appendix C.

<sup>8</sup> Beyond the landscaping and fencing at the edge of the proposed road, as stated in Section 5 of the Integrated Traffic Assessment (ITA), prepared by Andrew Metherell of Stantec Ltd.

## 2 Statutory Considerations

### 2.1 Resource Management Act 1991

49. The Proposed Plan has been prepared in accordance with the RMA and in particular, the requirements of:
- section 74 Matters to be considered by territorial authority, and
  - section 75 Contents of district plans,
50. There are a number of higher order planning documents and strategic plans that provide direction and guidance for the preparation and content of the Proposed Plan. These documents are discussed in detail within the Section 32 Evaluation Report: Whaitua Taiwhenua /Rural.

### 2.2 Section 32AA

51. Section 32AA requires that a further evaluation of the recommended amendments to provisions be undertaken that corresponds to the scale and significance of the changes.
52. The introduction of a SPZ(RA) zone represents a significant departure from the Rural Lifestyle Zone and its provisions. I have determined there is insufficient evidence provided to support the submission and therefore have not undertaken a further evaluation of the proposed provisions in accordance with s32AA of the RMA.

### 2.3 Trade Competition

53. Trade competition is not considered relevant to the submitter's zoning proposal.
54. There are no known trade competition issues raised within the submissions.

### 3 Background

#### 3.1 Site and Surrounds

##### 3.1.1 Land affected by Submission [10]

55. Submission 10 relates to the following properties in the vicinity of the Rangiora Airfield:
- 207 Merton Road consisting of Lot 1 DP 410643
  - 219 Merton Road consisting of Lots 2-4 DP 320694, Lot 1 & 2 DP 320694, Lot 1 DP 24674 and Rural Section 38634.
  - 172 Priors Road consisting of Lot 5 DP 410643
  - 181 Priors Road consisting of Rural Section 5655 and Rural Section 5928 Part 10471.
56. Land affected by the submitter's zoning proposal is located in between Merton Road and Priors Road, approximately 1.5km to the west of Rangiora<sup>9</sup>. Figure 1 shows the land that is affected by the submission.



**Figure 1 – Land affected by the submitter's zoning proposal outlined in red dash.** (Source: Page 5 of the Planning Evidence prepared by Dean Chrystal, dated 13 March 2024)

57. The site includes 49.13 ha of Rangiora Airfield land owned by Waimakariri District Council and approximately 56.95 ha rural land that is owned by the submitter, Daniel Smith<sup>10</sup>.

<sup>9</sup> The urban edge of Rangiora is approximately 1.5km from the area that is the subject of this zoning request when measured on the Waimakariri District Council Isoplan GIS system.

<sup>10</sup> This is our best-guess once Priors Road has been realigned. The submitter may wish to more accurate information in the hearing.

**3.1.2 Physical characteristics of the airfield and its surrounds**

58. I have been unable to visit the site physically at the time of writing this report and have reviewed photos and videos of the site to familiarise myself with the area. I intend to visit the site prior to the hearing commencing.
59. I am advised by my colleague, Ms Hannah Shields (Intermediate Planner, Harrison Grierson Christchurch), and the technical experts who have visited the site, that the physical description of the site and surrounds has been accurately described in paragraphs 33 through to 40 of Mr. Chrystal's planning evidence and the landscape Graphic Attachment to Statement of Landscape Evidence from Rory Langbridge. Mr. Chrystal's observations that are particularly important to the zoning request, are:
- a) The Rangiora Airfield is a small-scale facility, capable of serving light aircraft (including helicopters), with a grassed runway that is approximately 1km in length. There are no commercial passenger flights operating from the airfield and the airfield does not operate outside of daylight hours because there is no runway lighting or other navigational aids<sup>11</sup>.
  - b) There are aircraft related buildings along the northern edge of the airfield that are accessed from Airport Road, off Merton Road. Page 13 of the transportation evidence of Mr. Metherell confirms that this the only public access to the airfield.
  - c) Land adjacent to the airfield and subject to the submitter's zoning proposal have been used for rural purposes. There is one dwelling located on each of these properties.
  - d) The surrounding environment comprises of flat rural pastureland, with shelterbelts and fenced paddocks, etc.
  - e) Immediately to the north of the airfield is the Ashley/Rakahuri River. I understand from reading Mr. Metherell's evidence that there is an off-road cycle / walking path along the southern banks of the Ashley/Rakahuri River. This track is currently closed to unauthorised motor vehicles.

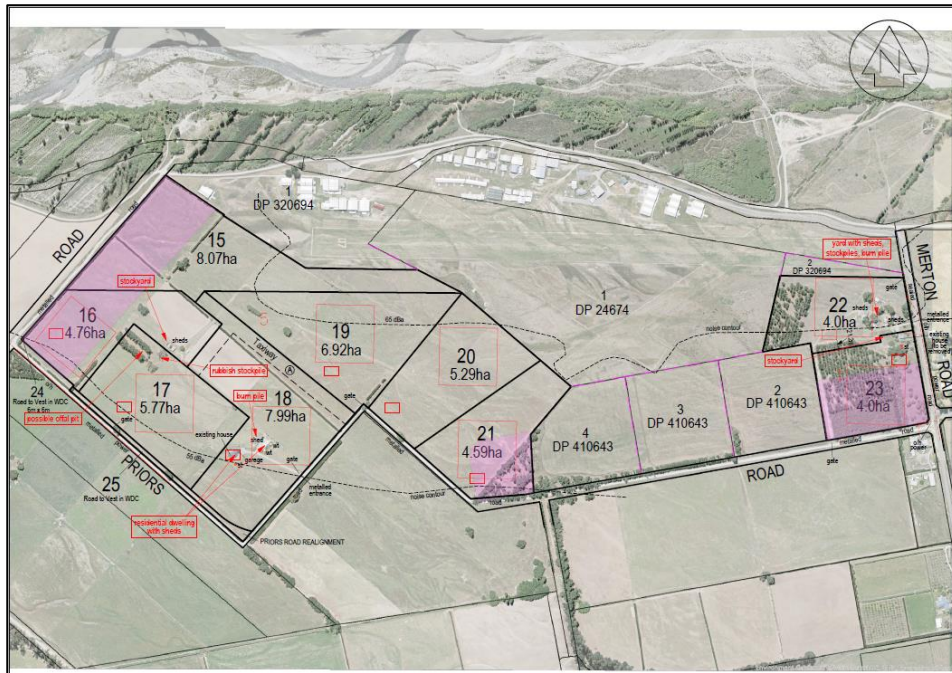
**3.1.3 Subdivision consent decisions affecting land subject to Submission [10]**

60. The submitter has previously applied for, and the Council has granted several subdivision consents to develop the existing sites surrounding the airfield. Existing, active resource consents for the site are detailed below.
61. The submission site at 172 Priors Road, Fernside and 207 Merton Road is subject to a subdivision consent to create nine lots and a road to vest from two underlying titles. The consent is referenced in Council records as RC215363. The consent authorised the creation of lots between 4ha – 6ha and included a taxiway to several lots.
62. The approved scheme plan is shown in Figure 2 below.

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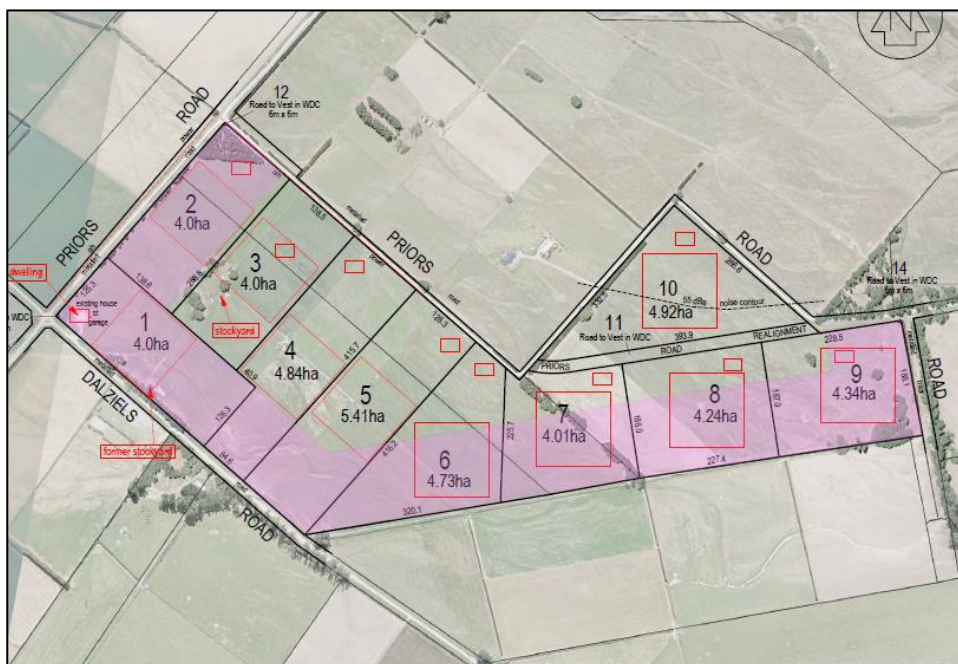
<sup>11</sup> Helicopters can take off at night if they have a serviceable light. Paragraph 13 of Mr. Noad's evidence states that such nighttime flights are infrequent and usually for training purposes. They are generally completed by 10:30pm.





**Figure 2 - Approved Subdivision Scheme Plan for RC215363 (Source: Approved Scheme Plan from Waimakariri District Council)**

63. Consent was granted in October 2021 and is subject to a number of conditions. At the proposed lot density, in my opinion, this subdivision does not present any implications for the SPZ(RA) proposed in the submission.
64. Consent was also sought to subdivide the adjacent land south of Priors Road at 181 Priors Road. Resource consent was granted in October 2021 to subdivide the site into 10 lots. The subdivision is referenced as RC215364 in Council records and shown in the approved scheme plan in Figure 3 below.



**Figure 3 - Approved Subdivision Scheme Plan for RC215364 (Source: Approved Scheme Plan from Waimakariri District Council)**

65. This approved realignment of Priors Road would result in Lot 10 being located to the north of Priors Road. In terms of the implications for the proposed rezoning, if this subdivision consent was progressed lot 10 would be contained wholly within the SPZ(RA) zone as proposed in Daniel Smith's submission.
66. The applicant specified that the portion of road that would be bypassed by the realignment of Priors Road would be subject to a future road stopping application and the land converted into a Right of Way<sup>12</sup>. This is proposed to occur outside of the subdivision consent and there are no conditions that require road stopping or amalgamation to occur for this parcel of land.
67. The introduction of the SPA(RA) zone may influence how the consent is given effect, when road realignment may occur and the timing of a future road stopping application. The Submitters has not provided information on when road realignment is proposed to occur as part of the submission.
68. The remainder of the lots are located outside of the proposed rezoning area and would be unaffected by the inclusion of a SPZ(RA) zone. I note if this subdivision was not enacted the existing lot at 181 Priors Road would take on a split zoning until such time the road realignment occurs, creating a road boundary between the SPZ(RA) and RLZ. While a split zoning is not generally desirable, I consider this will likely be a temporary scenario until such time road realignment occurs, and that split zoning is an implication of the submission regardless of whether this subdivision consent is given effect to.

### 3.1.4 Servicing arrangements

#### *Water and wastewater*

69. Rangiora Airfield has its own water supply bore and currently septic tank systems are utilised for wastewater disposal<sup>13</sup>.
70. It is noted that Council has considered extending reticulated water and wastewater services to the airfield and the surrounding land holdings from a planned development south of the Rangiora Racecourse, approximately 1.5km to the east of the airfield. It is understood that the extension of the Rangiora water and wastewater networks to the development area (south of the racecourse) will be funded by development contributions.
71. The cost of extending the water and wastewater network from the development (south of the racecourse) to the airfield was estimated in 2021 and 2023, a copy of these memorandums from Council is provided as **Appendix H**. I understand that there currently is no formal funding agreement in place. It is not known where the network would be extended to serve the development area south of the racecourse.
72. The 2021 estimates were based on three options and on the number of connections. The study included the consideration of the following:

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<sup>12</sup> This information was provided in response to a further information request from Council.

<sup>13</sup> Paragraph 16 of Mr. McCleod's evidence.

- a) 25 commercial lots (within the proposed SPZ(RA) area).
  - b) 20 airside residential lots (within the proposed SPZ(RA) area).
  - c) 9 rural residential lots (established by subdivision consent RC215364).
73. The 2021 estimates were updated in 2023 to consider increased construction costs, and were refined based on the services connecting to more properties within the SPZ(RA) area:
- a) 38 airside residential titles.
  - b) 22 commercial lots (within the proposed SPZ(RA) area).
  - c) 18 rural residential lots.
  - d) 1 central 'super lot' (central hanger space with refuelling zone).
74. In summary, while the airfield and SPZ(RA) land are not connected to reticulated services, no impediments or fatal flaws have been identified in the Council engineering memos that would prevent reticulated water and wastewater services from being extended from the development area 1.5km east of the airfield. The airfield connection will be subject to funding / cost share arrangements between the Council, the submitter (as developer of the SPZ(RA)), and any landowners who wish to connect to reticulated services along the length of the pipe. As noted by Mr. Chrystal, it will become more financially viable to extend the networks to the airfield if there are more properties for the networks to service<sup>14</sup>.
75. It appears that the rural airside residential lots would be large enough to provide onsite servicing and not be reliant upon a connection to reticulated services, however it would be beneficial if the submitter could clarify this matter at the hearing and identify constraints to the activities enabled by the submitter's proposed rezoning from being serviced onsite.

#### Stormwater

76. The SPZ(RA) land is not connected to reticulated stormwater services, and I assume that stormwater runoff is currently disposed via ground soakage.
77. Council Senior Civil and Geotechnical Engineer (John Aramowicz) is of the opinion that ground soakage will continue to be a viable solution if the land is zoned SPZ(RA):

*"Given the nature of the alluvial geology, I expect stormwater runoff from a future development will be relatively easy to manage using onsite disposing of treated stormwater into the ground – the same method of stormwater management that is generally used in the northwest and west parts of Rangiora."*

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<sup>14</sup> Paragraph 132 of Mr. Chrystal's evidence.

*Utilities*

78. The submitter has not provided any supporting information to confirm the availability of electricity and telecommunications infrastructure to service the development that would be enabled by the submitter's zoning proposal.

**3.1.5 Flood protection**

79. The airfield and surrounding land is located near the primary stopbank system of the Ashley River/Rakahuri River. I understand from Council that Environment Canterbury has for some time been investigating the possibility of implementing a secondary stopbank system around Priors Road adjacent to the Ashley River/Rakahuri to control breakout flows in high flood scenarios. The Waimakariri District Council have been advised by Environment Canterbury that their Long-Term Plan (LTP) has allocated funding to progress detailed investigation and implementation of flood protection works adjacent to the Ashley River/Rakahuri River. The Long-Term Plan (LTP) was adopted by ECan on 26 June 2024 and has allocated this funding<sup>15</sup>.
80. I understand that this work is in its infancy and any completed work is not publicly available. Given the early stages of the project, there is little weight that can be placed on the works or the resulting potential changes in flood flows when considering the appropriateness of provisions sought by the submitter.

**3.2 Operative Plan****3.2.1 Zoning**

81. All land that is subject to the submitter's zoning proposal has an existing / operative zoning of 'Rural.' This rural zoning applies to most of the district's rural land.
82. The zone seeks to maintain and enhance rural production and rural character, which amongst other things, is characterised by agricultural activities and a sense of openness (Objective 14.1.1). The rural character and sense of openness was supported by a minimum lot area of 4ha and a density of one dwellinghouse per 4ha.
83. The operative plan includes built form standards for dwellinghouses and structures within the Rural Zone. These include:
- Setbacks for built structures from boundaries and other dwellinghouses on adjoining sites.
  - Setback distances for the separation of farming activities and dwellinghouses in both Rural and Residential Zones.
  - Delineation areas where there are multiple dwellinghouses located on a site
84. Notably there are no maximum height or coverage provisions for built structures within the rural zone.

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<sup>15</sup> Environment Canterbury Long Term Plan Te Mahere Pae Tawhiti 2024-34, page 123

85. There are a number of other activities that are permitted within the zone subject to specific standards. Some of these activities include farming, signage, noise and light emission, storage of hazardous substances and application of farm effluent to land. The general rules of the plan state that any land use or activity is permitted if it complies with all of the conditions and provisions for permitted activities in all chapters.

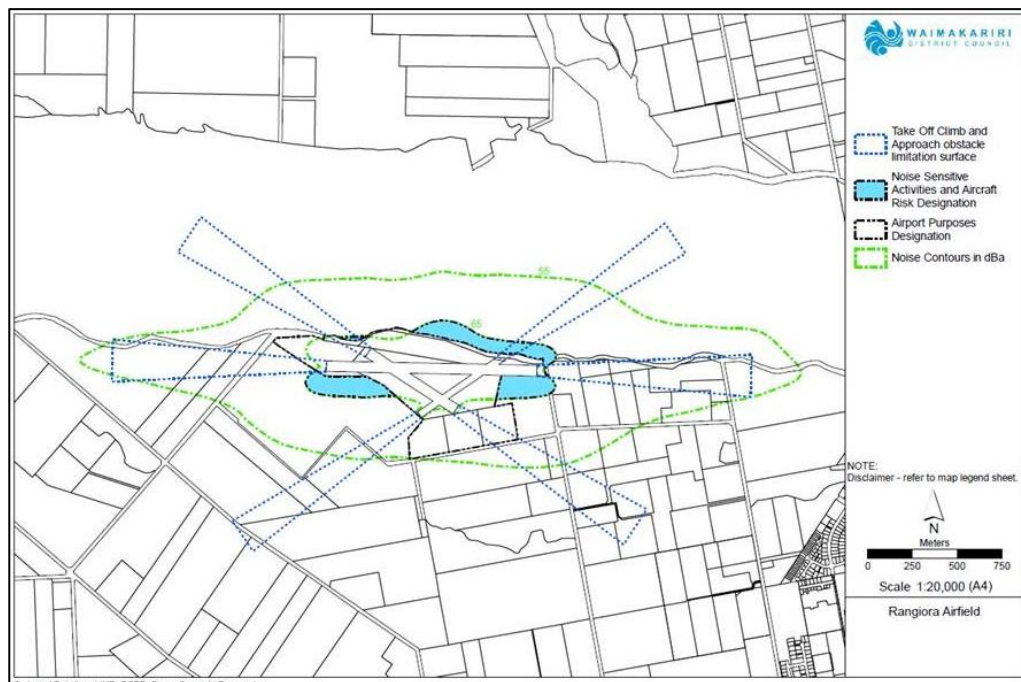
### 3.2.2 Designations

86. Designations D097 (Rangiora Airfield) and D098 (Noise contours) are existing under the Operative Plan and under have been rolled over in the Proposed Plan. The Average Noise Exposure contours that relate to D098 are depicted within the Operative Plan mapping. These designations are discussed in paragraphs 107-119 of this report.

### 3.2.3 Overlays and constraints

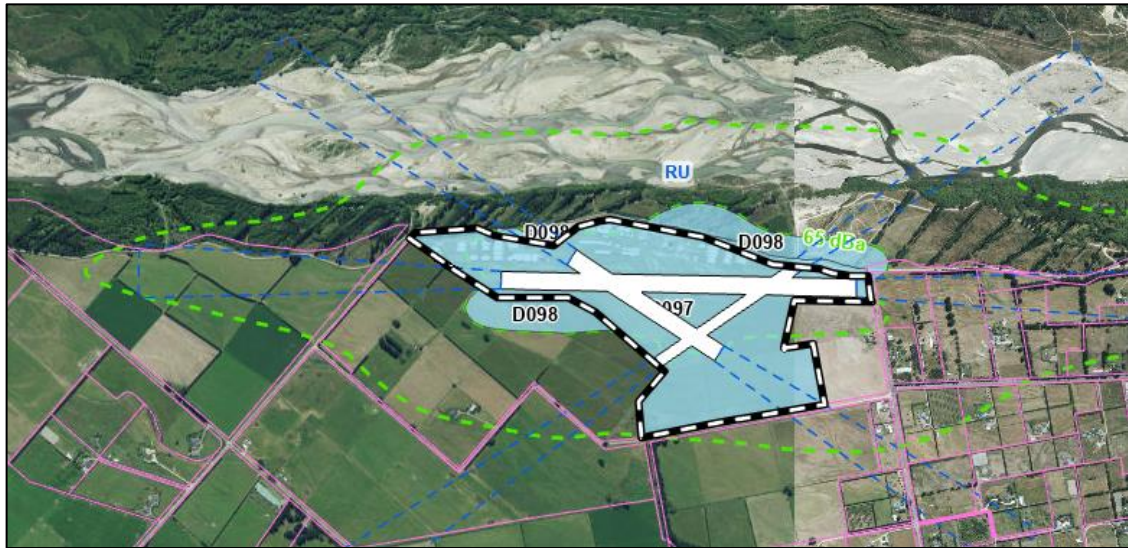
#### Rangiora Airfield Obstacle Limitation Surface

87. Resource consent for a non-complying activity would be required for any land use where a structure or vegetation penetrates the Rangiora Airfield Obstacle Limitation Surface (**Figure 4**). The limitation would therefore potentially affect the development potential of some of the land that would be affected by the relief sought by the submitter.



**Figure 4 - Extent of the Rangiora Airfield Obstacle Limitation Surface (Source: Waimakariri District Plan EMaps)**

88. The submitter has not provided information to understand how the development capacity of the land that is subject to the submitter's rezoning proposal would be affected by the limitation. It is noted that any alteration to the designation that would provide for the extension of the runways would come with consequential amendments to the Rangiora Airfield Obstacle Limitation Surfaces.
89. There are no other District Plan overlays or constraints applicable to the site. An overview of the Operative Plan mapping for the site is shown in Figure 5 below.



**Figure 5 - Waimakariri Operative Plan Map** (Source: Waimakariri District Plan EMaps)

### 3.3 Proposed District Plan

#### 3.3.1 Proposed zoning

90. All land that relates to the Submission #10 rezoning proposal (including the airfield), is zoned RLZ under the Proposed District Plan. The purpose of the zone is stated in the Introduction to the Rural Lifestyle zone (RLZ) as:

*“...to provide for primary productive activities, those activities that support rural activities and those that rely on the natural resources that exist in the zone, while recognising that the predominant character is derived from smaller sites.<sup>16</sup>”*

91. The RLZ is a method that has been applied to ensure that rural lifestyle opportunities are provided in appropriate locations so that larger landholdings will be retained in the General Rural Zone (GRZ) for productive rural activities<sup>17</sup>. In my opinion, this represents a significant shift in land use policy from the operative plan, and land in the vicinity of the Rangiora Airfield is one of the locations where small rural lots have been identified as being appropriate. However, as will be discussed in Paragraph 93 of this report, the RLZ also provides a consenting pathway for a broad range of industrial activities, many of which are included in the Submitter's proposed definition of “aircraft activities.”
92. To achieve the zone purpose, a minimum lot size of 4ha applies in the RLZ for in-situ subdivision. Subdivision that results in sites with a land area of less than 4ha is to be avoided under the Proposed Plan<sup>18</sup>. Having read the Rural s32 Report and the RLZ provisions, I am of the view that the main purpose of the minimum lot size is to maintain the rural character that exists within the RLZ and to establish amenity expectations for

<sup>16</sup> Part 3 – Area Specific Matters, Introduction to RLZ – Rural Lifestyle Zone.

<sup>17</sup> Rural s32 Report.

<sup>18</sup> Policy RLZ-P2 of the Proposed Plan.

the zone. The predominant character of the zone is also maintained through built form standards, many of which have been adopted into the SPZ(RA). These standards include:

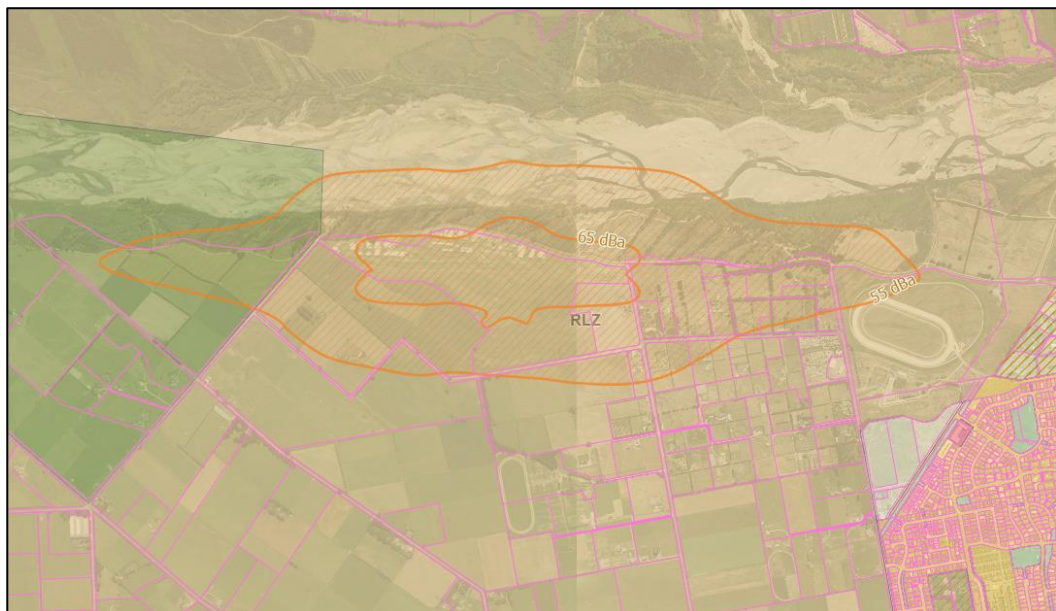
- a) Maximum building coverage – 20% of the site (RLZ-BFS1).
  - b) Maximum impermeable surface coverage – 20% of the site (RLZ-BFS2).
  - c) Maximum height – 10m for residential buildings and 12m for other buildings (RLZ-BFS3).
  - d) Minimum setback distances of 20m for residential units (all boundaries) and for all other buildings, 10m from the road boundary and 3m from internal boundaries (RLZ-BFS4).
  - e) Maximum gross floor area for any building – 550m<sup>2</sup> (RLZ-BFS5).
93. Significant structures and buildings are therefore anticipated within the RLZ, but many of the activities that would require a large building require resource consent. For instance, intensive indoor primary production activities, equestrian activities, and industrial activities all would require resource consent, regardless of their scale. It is also noted that some permitted activities are subject to more restrictive built form standards that govern their scale and the size of buildings that can be erected to accommodate them without resource consent.
94. Examples of permitted activities (subject to relevant standards) in the RLZ include:
- a) Primary production activities.
  - b) Residential units (one per site) and minor residential units (one per site).
  - c) Buildings that are accessory to residential activities.
  - d) Home occupations.
  - e) Rural industry.
  - f) Rural tourism.
  - g) Visitor accommodation.
95. In my opinion, subject to complying with standards, some of the listed permitted airfield activities could already be established within the RLZ as a permitted activity. These include:
- a) Subject to complying with standards, it is possible to construct hangers that are accessory to residential use.
  - b) Subject to complying with standards, it is possible to establish aircraft related industry to support or service the rural environment as a 'rural industry' (e.g. top dressing).
  - c) Subject to complying with standards, it is possible to establish a visitor accommodation activity for up to eight persons.
96. With respect to the Z Energy Limited submission, it is unclear whether a refuelling station activity that is linked to the airfield would be assessed as a "rural industry" activity under

the Proposed Plan, which could be established as a permitted activity under RLZ-R11. (That is, a business undertaken in a rural environment that directly supports, services, or is dependent on primary production). While I accept that a refuelling station is not quite the same as a “service station,” this is listed as a retail activity under “commercial activities” in the nesting table of the Proposed Plan. Retail activities require resource consent for a non-complying activity under RLZ-R39.

97. The RLZ also provides a consenting pathway for many of the activities that would be enabled by the SPZ(RA), such as industrial activities and education activities (both discretionary activities). Retail activities that are not associated with an activity are provided for as permitted, restricted discretionary or discretionary activity requires resource consent for a non-complying activity.
98. The RLZ provides for primary production uses such as agricultural, pastoral, and horticultural land uses as a permitted activity under RLZ-R2 (subject to compliance with standards). There is currently no similar provision in the SPZ(RA) that would provide for ongoing primary production uses, or for the construction of buildings accessory to primary production uses as a permitted activity. There are also no supporting policies in the SPZ(RA) that relate to ongoing operation of primary production uses because it is not a rural zone.

### 3.3.2 Noise provisions and the Noise Contours Overlay

99. In addition to Designation WDC-1, there is the 55dBA  $L_{dn}$  noise contour overlay that applies to RLZ and GRUZ land in the vicinity of the Rangiora Airfield (Figure 6). The 55dBA  $L_{dn}$  noise contour overlay applies to all land outside of the airfield site that is the subject of the submitter's zoning proposal.



**Figure 6 - Extent of the Noise Contour Overlay in the Proposed plan (Source: Waimakariri District Plan EMaps)**

100. I agree with Mr. Chrystal that Objective NOISE-O3 and Policy NOISE-P5 of the Proposed Plan seek to avoid noise sensitive activities within the 55dBA  $L_{dn}$  noise contour overlay. I



also agree that NOISE-P5 and NOISE-R22 prohibit noise sensitive activities within the 65 dBA  $L_{dn}$  noise contour.

101. NOISE-R15 states that any noise sensitive activity within the 55dBA  $L_{dn}$  noise contour is permitted without resource consent (subject to compliance with other Proposed Plan rules) if they are insulated to achieve the indoor sound levels specified in Table NOISE-1. If they are not insulated to achieve those standards, resource consent is required for a non-complying activity. Therefore, I also agree with Mr. Chrystal that it would be challenging to obtain resource consent for a non-complying activity given the duty to 'avoid' establishing noise sensitive activities under NOISE-O3 and NOISE-P5.
102. I also consider that proposals to establish residential units or lots at a greater density than what is anticipated within the RLZ would also be contrary to NOISE-O3 and NOISE-P5 if those activities are also within the 55dBA  $L_{dn}$  noise contour overlay.

### **3.3.3 NOISE-R13 – Noise limits relating to the operation of Rangiora Airfield**

103. Rule NOISE-R13 of the Proposed Plan outlines the noise that could be generated by "aircraft operations" at Rangiora Airfield as a permitted activity (including helicopters). The submitter proposes to change NOISE-R13 so that it applies to sensitive receivers within the SPZ(RA) and not the RLZ.
104. Rule NOISE-R13(1) exempts the following activities from needing to operate below 65 dBA LZ outside of the 65 dBA LN noise contour (i.e., NOISE-R13(2)), until aircraft movements exceed 70,000 movements per year<sup>19</sup>:
  - a) Emergency medical or for national / civil defence reasons, air shows, military operations;
  - b) Aircraft using the airfield as a necessary alternative to an airfield elsewhere;
  - c) Aircraft taxiing; and
  - d) Engine run-ups for each 50-hour check.
105. All the activities listed in paragraph 92 would be enabled by the SPZ(RA) outside of designation WDC-1 and some of these activities would occur near the noise sensitive activities enabled by the SPZ(RA). It does not include engine testing associated with engine maintenance / repair activities. This is discussed further in paragraphs 339-346 of this report.
106. In my opinion, it is not clear how NOISE-R13 could be legally applied to the activities occurring within designations WDC-1 and WDC-2 because the NOISE-R13 measures have not been replicated in the designation conditions. This is discussed further in the following section 3.3.4 of this report.

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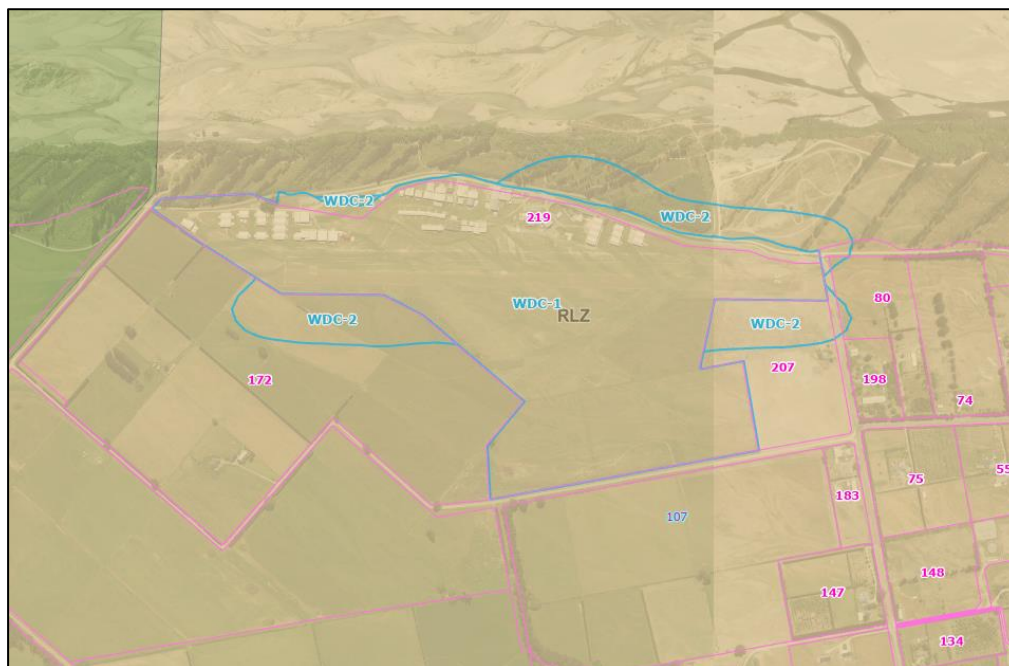
<sup>19</sup> As confirmed in Section 3.11.7 of the "Council reply on Te Ooro – Noise" on behalf of Waimakariri District Council on 30 November 2023.

### 3.3.4 Designations WDC-1 and WDC-2

107. The following designations are relevant to Submission 10 and the relief sought by the submission:
- a) WDC-1 – Airfield purposes.
  - b) WDC-2 – Restriction to avoid noise sensitive activities, and to manage activities which pose a risk to aircraft movements.
108. Both WDC-1 and WDC-2 have been rolled over into the Proposed Plan without alteration.
109. Designations WDC-1 and WDC-2 were considered along with a private plan change request (Plan Change 45 (PC 45)) to the Operative Plan in September 2020. The purpose of the designations and PC 45 was to:
- a) Protect and provide for the ongoing operation of the airfield; and
  - b) Provide certainty to the acoustic amenity of the surrounding area<sup>20</sup>.
110. To achieve this purpose, the following changes (amongst other things) were made to the Operative Plan that have been retained in the Proposed Plan:
- a) Prohibit noise sensitive development (which includes residential units) within the Rangiora 65dBA L<sub>dn</sub> noise contour;
  - b) Require the Rangiora Airfield to operate so that noise from aircraft operations does not exceed L<sub>dn</sub> 65dBA outside the 65dBA L<sub>dn</sub> noise contour;
  - c) Require any noise sensitive activity within the 55dBA L<sub>dn</sub> noise contour lines to be insulated from aircraft noise (a non-complying activity is triggered if no insulation is provided); and
  - d) Various amendments to the objectives and policies framework for the Utilities and Traffic and Rural Chapters to avoid the potential for reverse sensitivity effects and providing for the ongoing operation of the airfield.
111. These controls impose both restrictions on how adjacent land can be used and restrictions on how the airfield must be managed to ensure that noise from aircraft operations does not exceed L<sub>dn</sub> 65dBA outside the 65dBA L<sub>dn</sub> noise contour. It is noted that the spatial extent of the 65dBA L<sub>dn</sub> noise contour is relatively small, being three adjacent rural properties, the southern bank / public reserve of the Ashley / Rakahuri River, and the airfield itself (Figure 7).

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<sup>20</sup> Paragraph 10 of the decision on Plan Change 45 and Designations (September 2020).



**Figure 7 - Extent of designations WDC-1 Airfield Purposes and WDC-2 65dBA Noise Contour in the Proposed Plan (Source: Waimakariri District Plan EMaps)**

112. Figure 7 also shows that the extent of the airfield designation (WDC-1) is limited to the site of the airfield.
113. Mr. Chrystal incorrectly states in his evidence that the airfield is designated for “**airport** purposes.” The Operative Plan and Proposed Plan both state that the land at 219 Merton Road is designated for “**airfield** purposes”. As the Operative Plan and the Proposed Plan do not define “airfield,” I have referred to the common definition provided by the Cambridge Dictionary, which highlights the limited scale and servicing offering of an airfield when compared to an airport:

*“A level area where aircraft can take off and land, with fewer buildings and services than an airport and used by fewer passengers.”*

114. The use of the term “*airfield*” instead of “*airport*” appears to have been the subject of some conjecture at the PC45 hearing<sup>21</sup>. In paragraphs 53 and 54 of the decision, “airfield” was not defined as it was considered unlikely that non-aircraft uses would establish within the airfield due to its location and operating hours (being limited to operating in hours of daylight). The commissioner noted that if the term were ever in dispute, the purpose of the designation that was stated in the NoR documents could be referenced:

*“...to enable the efficient on-going operation of the existing Rangiora Airfield.”*

115. It is therefore my view that the scale and operation of the airfield was an important consideration for the hearing commissioner, who also noted that an airfield of this scale and function is not unusual in a rural environment<sup>22</sup>. I also note that PC45 did not change

<sup>21</sup> Paragraphs 52-54 of the Plan Change 45 and Notice of Requirement Decisions.

<sup>22</sup> For instance, Paragraph 42 of the Plan Change 45 and Notice of Requirement Decisions.

the underlying rural zoning of the airfield, and rural zone yard setback standards of the Operative Plan were incorporated into the designation conditions.

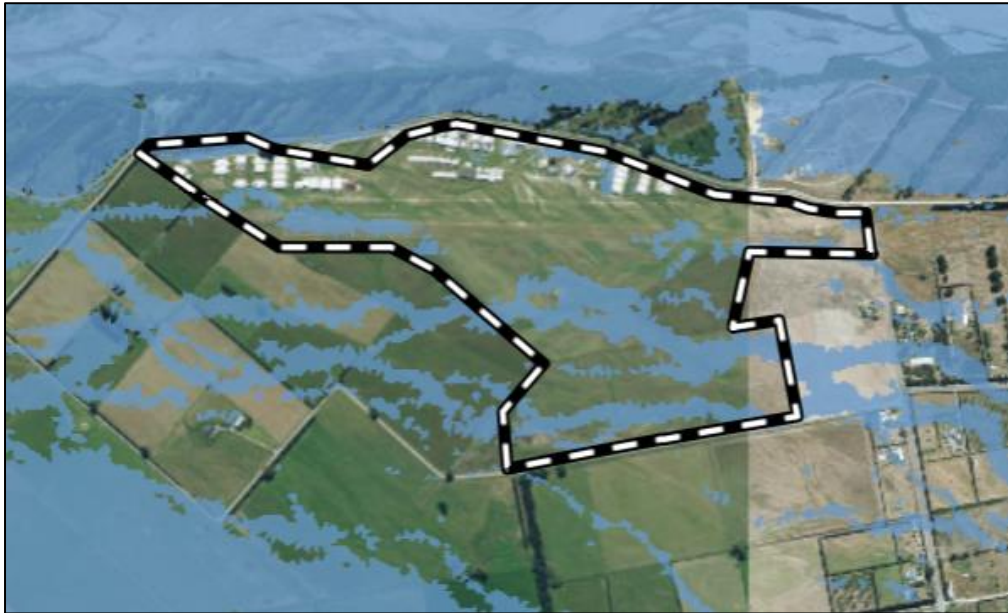
116. The Waimakariri District Council (the Council) is the requiring authority for WDC-1 and WDC-2 and is responsible for capital improvements and general maintenance of the airfield, and for managing the operational budget of the airfield<sup>23</sup>. I understand that the Council leases defined areas within the airfield for hangers, etc, and is not financially responsible for the construction and maintenance of non-public hangars and facilities (e.g. fuel pumps).
117. As will be discussed in Paragraphs 181-190 of this report, insufficient information has been provided to understand the future role of the airfield and whether the capacity freed-up or enabled by the SPZ(RA) is needed to support the future role of the airfield. It would also be beneficial to understand the existing capacity within the airfield to meet demand for hangars.
118. The purpose of the designation is therefore critical to understanding what activities are related to the operation and development of the airfield, and what activities can be considered as ancillary to an airfield. (For instance, passenger services may fall outside the designated purpose of the airfield). While it is possible that the runway could be sealed under the designation, an alteration to the designation would be needed to lengthen the runway.
119. At present, works within the designation would require the Council (as requiring authority) to submit an Outline Plan of Works (OPW) under Section 176A of the RMA to ensure that the works are in accordance with the purpose of the designation (unless the Council agrees to waive the requirement). An OPW provides an opportunity for the regulatory arm of Council to consider mitigation measures and to request changes for the requiring authority to consider. Under the SPZ(RA), many foreseeable airfield related works (e.g. navigation equipment) would be permitted by the underlying zone and would not require an OPW. Other airfield buildings that may not be in accordance with the designation (e.g. a terminal building) would also be permitted within Council consideration, despite arguably not being in accordance with the purpose of designation.

### **3.3.5 Non-Urban Flood**

120. I have reviewed the Proposed Plan mapping overlays for the subject site and identified the site is located within the Non- Urban Flood Assessment Overlay. The extent of the overlay is visible as blue shading in Figure 8 below.

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<sup>23</sup> Paragraphs 7 and 8 of Mr. McLeod's evidence.



**Figure 8 - Non- Urban Flood Assessment Overlay within the Proposed Plan**  
(Source: Waimakariri District Plan EMaps)

121. The overlay includes corresponding rules within the Natural Hazards Chapter of the Proposed Plan. The proposed plan seeks to manage risk of flooding on natural hazard sensitive activities such as habitable buildings and extensions. Rules NH-R2 & NH-R3 states that natural hazard sensitive activities are permitted within Rural Zones (including the RLZ) where buildings are not located within high flood hazard areas or located within overland flow paths. Flood Assessment Certificates are required to determine the extent of flooding risk and appropriate finished floor levels for hazard sensitive activities. Where compliance is not achieved with the provisions for natural hazard sensitive buildings and additions the activity is a Restricted Discretionary Activity.
122. The overlay also seeks to manage the installation of infrastructure and critical infrastructure by including provisions that control the finished ground contours, and overall footprint of structures within the Non-Urban Flood Assessment Overlay.
123. Mr Chrystal has proposed the relevant provisions be amended to also apply to the Special Purpose Zone Rangiora Airfield. This would see the provisions continue to apply to the zone as intended by the Proposed Plan. Accordingly, the change of zoning would not have implications for the application of the Non-Urban Flood Assessment Overlay.

### **3.3.6 Natural Feature and Landscape Overlay**

124. The Ashley/Rakahuri Significant Amenity Landscape (SAL) is also a relevant overlay identified within the Proposed Plan. The overlay is located predominantly along the northern boundary of the Airfield and follows the margin of the Ashley/Rakahuri River. The overlay intersects the airfield land in the northeast corner of the subject site. The overlay is shown in Figure 9 below as a green dotted area.



**Figure 9 - Ashley / Rakahuri SAL Overlay within the Proposed Plan** (Source: Waimakariri District Plan EMaps)

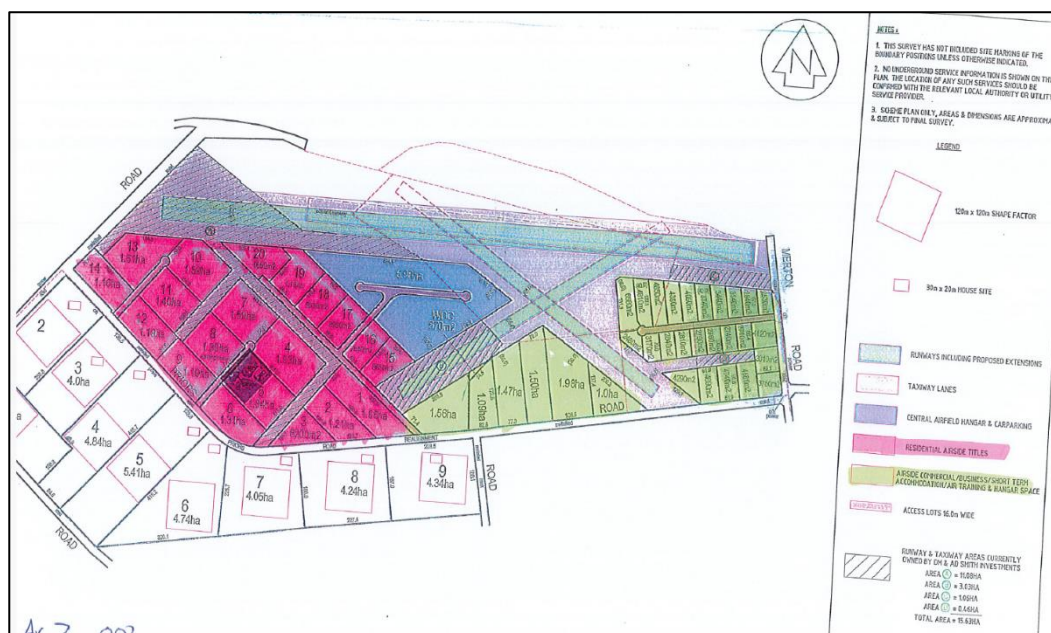
125. The purpose of this overlay is to recognise the value of significant amenity landscapes, including their significance to the district, and maintain the amenity and openness of the areas.
126. The overlay includes corresponding rules within the Natural Features and Landscape Chapter of the Proposed Plan. Rules seek to control additions to existing buildings, new buildings for park management or conservation purposes, farm and primary production buildings as well as residential units and public amenities. All of these activities can occur as permitted activities subject to the provisions of the Proposed Plan.
127. There are also rules that restrict the use of commercialised motorised activities, irrigation machinery, new roads and plantation forestry within this area. These activities are subject to resource consent within the Proposed Plan.
128. This overlay will be retained and would be unaffected by the introduction of a SPZ(RA) zone. I note this has limited applicability to the land uses proposed by the submitter, as the overlay only applies to a small area of the site and is located within the existing airfield.

### 3.4 Proposed Changes to the Proposed Plan

129. I have reviewed the proposed provisions for the SPZ(RA) and provide a summary in this section of the report. In doing so, I have noted a number of inconsistencies between the proposed SPZ(RA) planning provisions, the stated purpose of the SPZ(RA), and the anticipated outcomes that have been assessed by the submitter's technical specialists. I also discuss these inconsistencies in this section of the report.

#### Relief sought in the submission

130. The submission seeks to rezone land at Rangiora Airfield from RLZ to SPZ(RA) to accommodate activity as identified on drawing attachment SPArZ-002, dated 8 October 2021 (Figure 10).



**Figure 10 - Drawing SPArZ-002 that was attached to the submission (Source: Submission 10 - Daniel Smith, page 6)**

131. The title block for drawing SPArZ-002 indicates the type of activities that may occur within the SPZ(RA):
- The pink area would be used for “residential airside titles.”
  - The green area would be used for “airside commercial / business / short-term accommodation / air training and hanger space.”
  - The darker blue area (between the runways) would be used for “central airfield hangar and carparking.”
  - The light-blue area would be used for “runways including proposed extensions.”
132. Drawing SPArZ-002 also indicates a potential subdivision layout with roads, taxiways, and internal lot boundaries that suggest the potential intensity of land uses that are envisaged.
133. No additional information was provided in the submission regarding the scale and nature of the land uses shown on drawing SPArZ-002. Furthermore, the submission did not include the proposed wording of any new objectives, policies or rules, or outline any proposed changes to the provisions within the notified Proposed Plan.
134. The changes that the submitter now seeks to the Proposed Plan are outlined in Appendix 1 of Mr. Chrystal’s expert planning evidence. These changes include objectives, policies, rules, outline development plan and assessment criteria relating to the proposed SPZ(RA) and consequential changes to the notified district-wide provisions of the Proposed Plan to ensure that the provisions align with the proposed zoning. Paragraph 25 of Mr. Chrystal’s evidence describes the purpose of the SPZ(RA):

*“The purpose of the SPZ(RA) is to provide an airpark for aviation operations (including maintenance and repair of aircraft); appropriate airfield related activities (including commercial and industrial activities); and a limited number of residential properties*

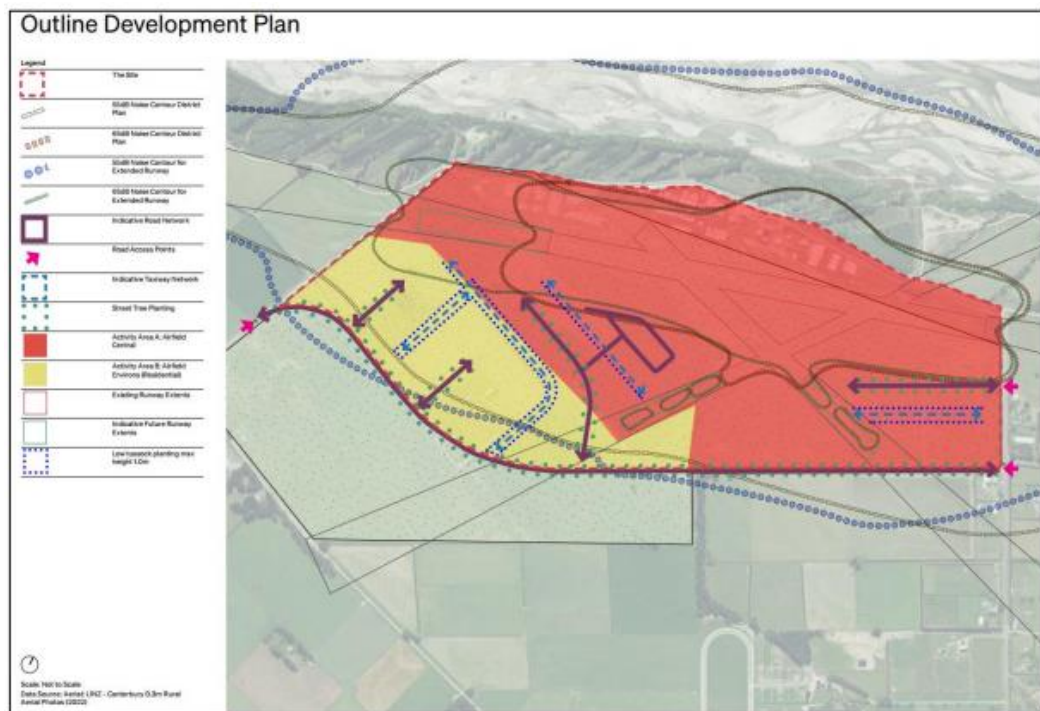
*for aircraft enthusiasts to live in close proximity to the Rangiora Airfield. The proposal would also facilitate the expansion of runways 07/25 and 04/22 and the realignment of Priors Road."*

135. The above purpose of the SPZ(RA) is more-or-less replicated in the proposed introduction section to the zone.
136. Objective SPZ(RA)-01 takes that purpose and emphasises the need to enable the continued operation and development of the airfield:

*"To enable the continued operation and future development of the Rangiora Airfield as a strategically significant, safe and economically sustainable airfield that meets the current and future needs of the aviation community within the District and Region."*

#### Outline Development Plan (ODP)

137. The supplied Outline Development Plan (ODP), referred SPZ(RA)-APP1-ODP, and supplied in Appendix 1 of Mr. Chrystal's evidence, is a high-level representation of drawing SPArZ-002 that was attached to the submission, and it is at the heart of the proposed SPZ(RA) provisions. (Figure 11).



**Figure 11 - Proposed Outline Development Plan (Source: SPZ(RA) - APP1 – ODP)**

138. The ODP identifies the following key elements that will drive the development of the SPZ(RA):
- The spatial extent of 'Area A – Airfield Central' (orange shaded area) where aircraft activities are proposed.
  - The spatial extent of 'Area B – Airfield Environs (Residential)' (yellow shaded area) where residential activity with connection to the airfield is proposed.
  - Indicative road networks and road access points.



- d) Indicative locations of taxiways.
- e) Indicative future runway extensions and indicative locations of 55 dB and 65 dB noise contours should the runways be extended.
- f) The outline of the obstacle limitation surfaces (though these are not labelled in the key).

#### Definition of Airfield Activities

139. The submitter's zoning proposal seeks to introduce a definition of "airfield activity" into the Proposed Plan. The definition includes a list of activities that are **related to or ancillary to the function and operation of the Rangiora Airfield** (emphasis added). The list includes a wide range of activities that are associated with existing airfield activities (e.g. runways, taxiways, hangars), but there are other activities that are associated with services that are not currently provided at the airfield (e.g. airport terminals, catering and preparation of food, commercial and industrial activities associated with the needs of airfield employees and visitors, etc).
140. As will be discussed in Paragraphs 146-148 of this report, there are few planning controls proposed that would limit the scale of the airfield activities that could establish within Area A as a permitted activity (subject to compliance with other standards). Therefore, in my view, the words "related to or ancillary to" in the definition of "airfield activity" is critical to understanding the type of activities that could be enabled under the SPZ(RA) and would be relied upon to give effect to the purpose of the proposed zone.
141. In this regard, the Proposed Plan adopts the National Planning Standard definition of "ancillary activity," which means:
- "An activity that supports **and is subsidiary** to a primary activity."* (Emphasis added).
142. The definition of "airfield activities" excludes activities associated with aircraft operation and residential aircraft hangars. It is unclear what is meant by "residential aircraft hangars" (because this is not defined by the Proposed Plan or the submitter), but I assume that this is intended to differentiate hangars provided ancillary to residential units in Area B for private use, from those provided for general airfield or business / commercial use in Area A. While I have not recommended consequential amendments for the Hearing Panel to consider; the submitter will need to clarify what is meant by "residential hangar" in the hearing.

#### Definition of site

143. The submitter does not seek changes to the Proposed Plan's definition of "site."
144. I understand from Mr. McCleod's evidence that currently the land within the airfield is leased for non-public facilities, but it is unclear from the information provided whether the intention is for the land (or some of the land), within Area A to be leased, unit titled, or subdivided into freehold titles. This will affect the implementation of the proposed standards of the SPZ(RA) as they relate to Area A.

Provisions relating to Area A

145. Area A (Airfield Central) is where the “airfield activities” and buildings associated with airfield activities would be enabled as a permitted activity (subject to standards). Area A includes the designated airfield site and land required to extend the runways. Area A would add an additional 18ha of land for airfield and commercial / industrial purposes that are related, or ancillary to, the airfield.
146. There are no standards that would limit the scale or intensity of airfield activities within Area A other than the standards that apply to the construction of, or alterations or additions to, a building or other structure.
147. The use and development of land within Area A would largely be “land use led”. By this, I mean that the rule framework does not require the land to be subdivided prior to establishing an aircraft activity. Proposed SUB-R12 would require a consent notice to be imposed on created titles that would require a residential unit to be associated with an airfield related activity on the same site, but there is no requirement to subdivide the land before it is developed for aircraft activities.
148. There is no minimum lot size that would apply to the subdivision of land within Area A and there is no requirement to ensure that the subdivision aligns with an authorised land use development should land use development proceed ahead of subdivision, and there are few controls to manage the scale and intensity of the land use activity.
149. All land use development needs to be undertaken in accordance with the ODP (drawing SPZ(RA)-BFS1) or a resource consent for a non-complying activity would need to be obtained to undertake a development that is not in accordance with the ODP. This would encourage Area A development to integrate with, and have access to, an aircraft taxiway.
150. The submitter’s zoning proposal would enable up to 30 residential units to be established within Area A (outside of the 65 dBA LdN noise contour area) and development is limited to one residential unit per site<sup>24</sup>. This is the only activity within Area A that is “subdivision led”. This provides the means to establish a “no complaints” covenant on created titles and to link residential units to aircraft activities. There would be no consenting pathway for a subdivision proposal without a consent notice imposing the no complaints covenant and a requirement for residential activities to be linked to an airfield activity (as it would be a prohibited activity).
151. It is understood that the intention is to enable residential units where they are linked to ‘core airside activities’<sup>25</sup>, but this is not that well reflected in the proposed objectives and policies of the SPZ(RA). While there is no land use activity requirement in SPZ(RA)-R4 (Residential Unit) for the residential unit to be related or ancillary to a permitted airfield activity on the same site, and there is no requirement to limit the occupancy of the units to persons whose duties require them to reside on site, it would be impossible to

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<sup>24</sup> This control could be ultra vires, and at the very least, may introduce issues of fairness once the land is subdivided, and be problematic to monitor and implement for the Council. See paragraph 152 of this report.

<sup>25</sup> Introduction to the SPZ(RA).

- establish more than one residential activity on a site within Area A under SPZ(RA)-R3, as this would be a prohibited activity.
152. Proposed SUB-R12 does require a consent notice to be imposed that would link residential units to airfield activities. It is my view that this may be problematic to enforce should the nature of an aircraft related business change and the residential unit no longer be required to support the business. Under such circumstances, the activity would either need to cease to comply with the consent notice, or the consent notice would need to be varied to authorise the activity retrospectively, and this would be contrary to the SPZ(RA).
153. There could also be instances where 30 residential units are established and the 31<sup>st</sup> unit would be a prohibited activity under rule SPZ(RA)-R4, despite there being a genuine link to an airfield activity and the residential unit being established in compliance with the consent notice.
154. In my view, the restrictions imposed by SPZ(RA), and the consent notice would be challenging to implement, noting that a permitted activity status would provide limited opportunities for Council to assess whether the residential unit is linked to an airfield activity and that the airfield activity itself is ancillary to the airfield. I suggest that this would be open to legal interpretation and there may be more effective ways to manage this through the SPZ(RA) provisions. The only opportunity that the Council would have to investigate these links would be through the building consent process or by requiring a Certificate of Compliance under s139 of the RMA.
155. There is no requirement for residential units to be located within the same building that accommodates the airfield activity as is the case with visitor accommodation (the residential building could be separate from the aircraft activity building). There are no design standards that could control the appearance or arrangement /layout of compliant buildings (including residential units).
156. The land use control that would link a residential unit to an aircraft activity is the requirement that the residential unit occupies 75% of the GFA of all buildings on site. It is my view this is inadequate, and I recommend that changes are needed to make residential activities ancillary to aircraft activities within the land use rules of the SPZ(RA), and to mirror the requirement impose a consent notice that would establish this at subdivision stage.
157. Minor residential units are prohibited in Area A (SPZ(RA) – R5). I consider that this appropriate, as it achieves the purpose of the SPZ(RA) to establish activities that are ancillary or related to the airfield.
158. Residential units and other noise sensitive activities within the 55 dBA LN noise contour would need to meet the specified acoustic standards of the Proposed Plan (NOISE-R17).
159. There are no standards relating to outdoor amenity spaces for residential units.
160. All buildings are permitted within Area A if they are sited in a manner that is consistent with the ODP and comply with the applicable development standards, being:
- a) Maximum height limit – 12m.
  - b) Maximum building coverage (per site) – No maximum.

- c) Minimum setbacks of 100m from the centreline of the stopbank of the Ashley River / Rakahuri; 10m from a road boundary; 3m from an internal boundary, and 3m from the edge of a taxiway.
- d) Requirement that the outdoor storage of goods, materials, and equipment is to be associated with an airfield activity operating from the site.

Provisions relating to Area B – Airfield Environs (Residential)

- 161. Activity Area B: Airfield Environs (Residential) provides for low density residential development connected with airfield use. All aircraft activities (apart from taxiways) require resource consent for either a discretionary activity SPZ(RA)-R2(1), or a non-complying activity under SPZ(RA)-R2(3).
- 162. The development of Area B is 'subdivision led' because a subdivision would be required to establish the taxiways and low-density residential lots. Residential units are permitted outside of the 65 dBA LN at a rate of one residential unit per lot. This approach requires:
  - a) A 'no complaints' covenant to be registered on each residential site;
  - b) The subdivision to be undertaken in accordance with the ODP (via matters over which restriction has been restricted); and
  - c) All lots must be connected to a taxiway.
- 163. The minimum lot size in Area B is 5,000m<sup>2</sup>.
- 164. While the number of residential units within Area A is capped at 30, there is no similar control that would limit the number of residential units within Area B. Mr. Chrystal says that the SPZ(RA) will enable 20 lots, but this appears to be based on the concept plan that was attached to Mr. Smith's submission, within which all lots shown exceed a net area of 5,000m<sup>2</sup>. (The concept plan attached to the original submission shows 20 lots with most being over 1ha in area, although Lots 15-20 are not reflected in the ODP). Adding the net area of all Area B lots in the concept plan, there is 21.5ha of net land, so up to 43 lots could in theory be enabled based on a minimum lot size of 5,000m<sup>2</sup>. I do not believe that this was intended by the submitter, and it could be rectified by refining the subdivision standards. (E.g. including a larger minimum lot size, an average lot size, or a maximum number of lots standard).
- 165. There are specific standards relating to the scale of visitor accommodation that may be established within Area B. Minor residential units are prohibited in Area B and activities that are typically associated with rural and residential zoned areas are not listed and would require resource consent for a discretionary activity under Section 87B of the RMA by default (e.g. primary production activities, including those associated with the continued operation of pastoral farming activities on the SPZ(RA) land).
- 166. All buildings are permitted within Area B if they comply with the applicable development standards, being:
  - a) Maximum height limit – 10m for residential units and accessory buildings (excluding hangars – but there is no alternative permitted height limit for hangars stated);

- b) Maximum building coverage (per site) – 20% of the net site area;
- c) Minimum setback of 10m from any zone boundary, road boundary, and / or internal boundary.
- d) Requirement that the outdoor storage areas are screened by a 1.8m high solid fence, landscaping, or other screening.

#### Other proposed changes to the Proposed Plan

- 167. Minor changes to the NOISE, EARTHWORKS, TRANSPORT, and NATURAL HAZARDS provisions of the Proposed Plan have been proposed to align with the proposed SPZ(RA) provisions.
- 168. Changes to SIGN-R6 and SIGN-R7 have been proposed to provide for signage in Area A. Signage in Area B requires resource consent for a non-complying activity under SIGN-R7.
- 169. Changes to the SUBDIVISION provisions to align with the SPZ(RA) including the requirement for created lots to have guaranteed legal access via the proposed taxiways to Rangiora Airfield, as long as the airfield remains in use. Resource consent for a non-complying activity is required where no legal agreement is in place and would be contrary to Policy SPZ(RA)-P2.

#### Refuelling Station / Service Station provisions

- 170. With respect to the Z Energy Limited submission, it is noted that refuelling stations associated with the operation of the airfield would fall within the definition of “airfield activity” and subject to compliance with standards, would be assessed as a permitted activity within Area A. A service station, for the refuelling of vehicles other than aircraft, would also be assessed as a permitted activity if it could be demonstrated that it would service the needs of airfield passengers, pilots, visitors and employees of aircraft movements and airfield businesses.

### 3.5 Scope

- 171. The submission contained limited detail on the submitter's zoning proposal, and did not contain a detailed planning framework, or list changes sought to the district-wide Proposed Plan provisions. This detail has been provided in the evidence that has been prepared by technical experts on the submitter's behalf following the further submission process.
- 172. Cavell Leitch Limited (CLL) and Buddle Findlay Limited (BFL) have prepared legal advice on whether the submitter's full zoning proposal, as outlined in Appendix 1 of Mr. Chrystal's planning evidence, is within the scope of the original submission. This legal advice is included in **Appendix D** to this report.
- 173. CLL and BFL both agree that the absence of detailed objectives, policies and rules in the submission does not automatically mean that the submitter's zoning proposal is out of scope, and the zoning proposal does not need to be identical to what had been outlined in the submission to be considered within scope. The key test identified by both CLL and BFL is whether what has been sought “*is reasonably and fairly raised in the submissions on the plan change.*”

174. Furthermore, both CLL and BFL agree that the issue of whether a submission is within scope is a question of degree. I understand from the legal advice that the question that needs to be asked is, are all the proposed changes to the PWDP outlined in Appendix 1 of Mr. Chrystal's planning evidence a foreseeable consequence of the changes that were proposed in the submission?

*Legal advice from Cavell Leitch Limited (CLL) on scope*

175. CLL concludes that the submission is sufficiently clear in stating that the submitter seeks to rezone the land in the vicinity of the airfield for Special Purposes (Rangiora Airfield) and that this would involve establishing sensitive land uses within the 55 dBA LN noise contour overlay.

*Legal advice from Buddle Findlay Limited (BFL) on scope*

176. While acknowledging that the question of 'scope' is complex and requires a judgement exercise, BFL considers that the full extent of the submitter's zoning proposal is not within the scope of Mr. Smith's submission. BFL have identified the following elements as being not within the scope of the submission:
- a) The extent of residential development proposed for Area A. "Residential" was not mentioned on the concept plan that was attached to Mr. Smith's submission, only "short-term accommodation."
  - b) The removal of the minimum lot size for Area A. The concept plan shows lots that are between 2,530m<sup>2</sup> and 1.98ha in area.
  - c) The minimum lot size of 5,000m<sup>2</sup> that applies to Area B. The concept plan shows lots that are between 7,440m<sup>2</sup> and 1.93ha in area.
177. BFL also notes that the requirement for a no-complaints covenant to be registered on new lots and for lots to have legal access to the airfield (via a taxiway) was not clear in the submission. However, BFL has concluded that these are foreseeable controls for land uses adjacent to an airfield and with links to the airfield.

*Analysis*

178. I rely upon the legal expertise provided from CLL and BFL in preparing this report, and I consider that the intensity of residential land use provided for within Area A and Area B is outside the scope of the original submission.
179. While the minimum lot size of 5,000m<sup>2</sup> for Area B is smaller than any of the lots shown in the concept plan that was attached to the submission, all the lots on the concept plan are significantly less than 4ha (the minimum lot size in the RLZ). Therefore, I consider that the submitter's intention for the SPZ(RA) to have a density that is greater than provided for in the RLZ was clearly signalled in the submission. It is possible that a minimum lot size of 5,000m<sup>2</sup> could be within the scope of the submission should the SPZ(RA) have an average lot size requirement that reflects the range of lot sizes that are shown on the concept plan, or if the number of airside residential lots are capped in a similar manner (i.e. a similar number of lots) to what has been proposed in Area A.
180. I also agree with BFL that it is not clear from the original submission that there would be no minimum lot size requirement for Area A.

181. I also consider that it is not clear from the original submission whether residential activities are contemplated in Area A to the extent that the proposed planning framework for the SPZ(RA) would allow. The concept plan does not state “residential” for Area A, only ‘short-term’ accommodation (which I take as being transient accommodation similar to visitor accommodation or overnight accommodation for employees at or visitors to the airfield). Furthermore, the SPZ(RA) does not limit the length of stay within a residential unit.
182. In my view, it is possible that residential units that are clearly ancillary to an airside business or commercial activity (and needed to accommodate persons whose duties require them to live onsite), could reasonably be a foreseeable outcome from the concept plan attached to the original submission<sup>26</sup>. However, as expressed in paragraphs 151-154, I am not satisfied that the proposed land use provisions of the SPZ(RA) framework (including standards relating to buildings) would be sufficient to secure that outcome.
183. While not identified by BFL, the Hearing Panel may also wish to consider whether the following elements of the submitter’s zoning proposal are within the scope of the submission:
- a) The amended 55 dBA LN contour overlay shown on the ODP. The submission does not seek to increase the extent of the overlay, or the area of land affected by the overlay. I consider that showing the contours on the ODP is outside the scope of the submission. The submitter has not provided acoustic information to support changes to the 55 dBA LN contour.
  - b) The definition of “airfield activities” includes some activities that are not listed on the concept plan that was attached to the submission or may not be reasonably anticipated to meet the ‘airfield’ purpose of the designation. (e.g. airport terminals and passenger facilities). I am of the view that such activities fall within the scope of the submission, given the broader purpose of the proposed zoning to support the operation of the airfield.
  - c) Whether the “proposed extensions” to runways that are shown on concept plan SPAr2 002 is within the scope of the submission, given the purpose of the submission was to rezone land at Rangiora Airfield from RLZ to SPZ(RA) and given that the Council (as requiring authority), did not seek to alter designation WDC-1 to extend the runways. I consider the enabling provisions that would allow for the extension of the runways to be a consequence of the details put forward in the submission and could be considered within the scope of the submission by applying the same legal argument that was applied by BFL and CLL.

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<sup>26</sup> In my professional experience, it is relatively common to link residential units to activities that occur in an industrial or rural zone. (e.g. workers accommodation is used in rural zones to support productive use but be consistent with strategic / urban form objectives.

### 3.6 Future airfield function / scenario

184. The nature and scale of the existing airfield has been documented within Mr. Groome's and Mr. Macleod's evidence of behalf of the submitter. I consider that the scale and range of activities that exist align with the 'airfield' purpose of WDC-1 (see paragraphs 114-115 of this report). The relatively limited range of activities include recreational aircraft activities, flight training, agricultural operations, and aircraft maintenance.
185. These activities are confined to the designated airfield area. Activities must align with the purpose of the designation or obtain resource consent under the RLZ provisions. The proposed SPZ(RA) provisions would enable significant enlargement of the airfield and would enable a significant increase in the range and scale of activities that could establish at the airfield without altering the purpose of the designation.
186. As proposed, the SPZ(RA) could enable a scale of development that could if fully realised, become the dominant land use to the airfield instead of being ancillary to the airfield.
187. In my view, the submitter needs to provide information on the long-term vision for the Rangiora Airfield, and its role within the context of airfields / airports in the Canterbury region. This background information could marry the SPZ(RA) framework with what activities could be reasonably expected from the various opportunities referred to in Mr. Groome's evidence.
188. It is not known whether the lengthening of the runways and expansion of the airfield is a planned upgrade of the infrastructure asset and whether there has been funding allocated by WDC for capital investments beyond providing reticulated services.
189. Further information is required on the potential certification of the airfield and the potential increase in operating capacity, with enhanced services from what exists presently.
190. Insufficient information has been provided on the demand for commercial / industrial land for airfield related purposes, and insufficient information has been provided on the demand for airside residential units.
191. No information has been provided on the capacity of the existing airfield to provide for aircraft related activities. Could the demand for hangars be met by improving access to the southern portion of the airfield site? Would the residential offering and the ability to freehold titles under the SPZ(RA) increase demand for hangar space?
192. It is unclear whether the development of the airfield has been masterplanned with input from users of the airfield and other stakeholder groups. The outcomes of mana whenua engagement have not been supplied.
193. While I appreciate the reasons why the submitter has not requested that the land be rezoned by way of a private plan change with a notice of requirement, I am of the opinion that such an approach would have better aligned the purpose of the designation with the SPZ(RA) provisions and provided for a more holistic assessment, which could have included consideration of expanding the noise contours and the surface obstruction limitations.



### 3.7 Business and residential land capacity assessment

194. I acknowledge that the submitter is not justifying the zoning proposal on grounds that there is insufficient zoned capacity for commercial, industrial, and residential land uses in the Proposed Plan. The submitter suggests that the SPZ(RA) is needed to support activities that are related to the airfield and such land does not presently exist in the district.
195. In this regard, the submitter has not provided sufficient information to demonstrate that scale and intensity of the activities enabled are ancillary to the primacy of the airfield now and under a likely growth scenario.
196. Putting the link to the airfield to one side, the Proposed Plan zones sufficient land for general industrial, commercial, and residential purposes<sup>27</sup>. No additional capacity is necessary. However, I recognise the specific purpose of this zone and that the proposed activities would not be able to be provided within a 'conventional' zone framework in other locations.

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<sup>27</sup> As part of the Proposed Plan development Council has undertaken several capacity assessments including the Waimakariri District Business Land Assessment 2019, Business Land Assessment Update 2021 and Business Development Capacity Assessment 2023 (Greater Christchurch Partnership). These have been referred to within the Officers report for the Proposed Waimakariri District Plan: Commercial and Industrial Rezonings, dated 3 May 2024.

## 4 Consideration of Submission

197. This section of the report assesses the relief that has been sought by the submitter against the higher order policy documents. This section of the report is ordered as follows:
- a) Section 4.1 - Consideration of relief sought against the higher order policy documents that guide the growth of towns and cities within Canterbury, being the National Policy Statement - Urban Development (NPSUD) and Chapter 6 of the Canterbury Regional Policy Statement (CRPS).
  - b) Section 4.2 - Consideration of relief sought against the other relevant national policy statements, being the National Policy Statement – Highly Productive Land (NPSHPL), the National Policy Statement – Freshwater Management (NPSFM), and the National Policy Statement – Indigenous Biodiversity (NPSIB).
  - c) Section 4.3 - Consideration of relief sought against the relevant National Environmental Standards.
  - d) Section 4.4 - Consideration of relief sought against the other relevant chapters of the CRPS and the Canterbury Regional Plan.
  - e) Section 4.5 - Consideration of relief sought against the notified provisions of the Proposed Plan.
  - f) Section 4.6 - Consideration of relief sought against the other planning documents, including relevant iwi management plans and development / growth plans.
  - g) Section 4.7 - Other management plans and strategies

### 4.1 High-level documents that guide the growth of Greater Christchurch

198. This section of the report assesses the submitter's zoning proposal against both the National Policy Statement Urban Development (NPSUD) and Part 6 of the CRPS, given that these documents are closely connected. The other chapters of the CRPS are considered in section 4.4 of this report.

#### 4.1.1 National Policy Statement – Urban Development

199. I agree with Mr. Chrystal that the submitter's zoning proposal generally meets the intent of the 'responsive planning framework' that applies to unanticipated or out of sequence proposals, as articulated in Objective 6, Policy 6(c), Policy 8, and Part 3 of the NPSUD.
200. I concur with Mr. Chrystal's sentiments that the submitter's zoning proposal is unusual and something that is not normally considered under the NPSUD. The proposal is being 'pitched' as being required to facilitate the ongoing operation and development of a strategic asset, and it will provide niche opportunities for residential, commercial, and industrial development. The submitter's zoning proposal is not intended to significantly add business and residential capacity or increase housing affordability.
201. In the following assessment of the NPSUD, I have also been mindful that the proposed zoning has been sought to provide for the growth of an existing strategic asset that is

located away from populated urban areas. Because of the relatively isolated location of the airfield, the submitter's zoning proposal will inherently not give effect to some of the NPSUD policy relating to accessibility and reducing vehicle emissions (climate change). I therefore consider that these issues are peripheral to the consideration of the submitter's zoning proposal.

202. For completeness, I also note that extending the 55 dBA LN noise contour as indicatively shown in the Outline Development Plan would not affect existing urban areas or areas for future urban development that are being considered under the NPSUD via the Proposed Plan process.

#### *Well-Functioning Urban Environment*

203. I consider that the primary objective of the NPSUD is for New Zealand to have well-functioning urban environments that *"enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future."* The airfield is identified as key strategic infrastructure in the CRPS, which based on current operations, supports a mix of urban and rural activities.
204. Below is an assessment of the zoning proposal against Policy 1 of the NPSUD, which provides guidance to assess whether a planning decision would "at a minimum" contribute towards a 'well-functioning urban environment.' Taking each matter in turn, I am of the opinion that:
- a) The proposed zoning could provide for the needs or lifestyle choice of persons who work in the aircraft industry or have an interest in aircraft and, in concept, this is consistent with Policy 1(a). However, I consider that the submitter has provided insufficient information to demonstrate that there is demand for the style of living accommodation that would be enabled by the SPZ(RA), and it would not become a peri-urban subdivision of residents not linked in any way to the airfield activities. The submitter has also not provided evidence on how the proposal would enable Māori to express their cultural traditions and norms.
  - b) The submitter' proposed zoning could enable a range of niche business activities related (at the very least in terms of location) to the Rangiora Airfield. If these niche activities were provided at a scale that is related or ancillary to the airfield activities, they could in principle support a well-functioning urban (airfield) environment, however further information is required from the submitter to arrive at a conclusion.
  - c) The submitter has not provided adequate information to demonstrate that the enabled SPZ(RA) would in itself result in a well-functioning community, with access to jobs, housing, community services, natural spaces, open spaces, etc. I note that the SPZ(RA) would enable 50 residential (potentially more as the provisions are currently drafted), which could be considered to be a small village<sup>28</sup>. This 'village' would not have community facilities (other than the airfield) and would be located a considerable distance from community facilities and services needed to meet

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<sup>28</sup> Paragraph 6.1 of Mr. Nicholson's evidence.

day-to-day living. I am also concerned that the permissive nature of the SPZ(RA) provisions could lead to a poor-quality living environment for inhabitants, which may include long-term accommodation for families within Area A that may be incompatible with airfield activities.

- d) The SPZ(RA) would have poor access to public and active transport. I am concerned that as drafted within the submission, the Proposed Plan would not ensure that Areas A and B would be connected by active transport facilities. The proposed planning framework and the Proposed Plan does not capitalise upon the opportunity to connect to the cycle trail alongside the Ashley River, which was identified by Mr. Metherell in Section 10.3 of the Integrated Transport Assessment Report.
- e) In principle, the niche activities provided by the SPZ(RA) would not have an adverse effect upon the competitive operation of land and development markets, as the zoning would provide an opportunity that does not exist within Waimakariri District and is rare in a regional and national context. However, further information is needed from the submitter that the enabled capacity would be ancillary to the airfield activities. I am also concerned that as currently drafted, it is foreseeable that commercial and light industrial activities with only a loose connection to the airfield could establish within Area A and not within zoned commercial and industrial areas.
- f) As above, greenhouse gas emissions are a peripheral issue and much depends on ensuring that the scale and nature of the land uses enabled by the SPZ(RA). While I accept that the basic premise that the clustering of some activities may reduce greenhouse gas emissions from some vehicle trips, however the submitter has not provided a supporting analysis to demonstrate whether in an overall sense, the clustering of activities would offset emissions arising from other trips (including from employees residing in existing urban areas).
- g) Based on available evidence, the site is subject to minor flood hazards and the land is considered by Council's Senior Civil Engineer to be suitable for the type of land uses that would be enabled by the SPZ(RA).

205. Overall, I conclude that in the round, the proposal could contribute to a well-functioning environment, subject to further information being provided.

#### Policy 8

206. Policy 8 of the NPSUD states:

*"Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is:*

- a) Unanticipated by RMA planning documents; or*
- b) Out-of-sequence planned land release."*

207. I agree with Mr. Chrystal that the submitter's zoning proposal is unanticipated and is out of sequence.

208. I understand that that the “significant development capacity” is applied to Policy 8 to filter out small, speculative proposals<sup>29</sup>. There are no criteria within the CRPS or WDC to determine which plan changes would add significantly to development capacity. However, I understand that proposals could be ‘significant’ in a local context and proposals that add capacity to meet identified demand for a particular land use may also be ‘significant’<sup>30</sup>.
209. If it can be demonstrated that there is demand for the type of activities enabled by the SPZ(RA) in an airside location, at the intensity and scale enabled by the SPZ(RA) provisions, the submitter’s zoning proposal could (in-principle) be supported by Policy 8 of the NPSUD. However, insufficient information has been provided by the submitter to demonstrate that there is demand for airside business and residential land, at the scale and intensity enabled by the SPZ(RA).

#### *Te Tiriti o Waitangi*

210. Insufficient information has been provided by the submitter to ascertain how the principles of the Treaty of Waitangi have been taken into account in the drafting of the SPZ(RA) provisions, as required by Policy 9 of the NPSUD. It is understood that the submitter was aiming to engage with mana whenua following the preparation of their evidence.

#### *Conclusion*

211. Further information is required on whether the enabled residential, commercial, and industrial capacity is needed to support the airfield and its strategic function. If the enabled capacity is greater than what is required, the permissive nature of the proposed SPZ(RA) planning framework could lead to outcomes that are inconsistent with a well-functioning urban environment.
212. This information is also needed to confirm that the submitter’s proposal is needed to support the operation and development of a strategic asset, which would allow for the submitter’s proposal to be considered outside of the normal run of things under Policy 8 of the NPSUD. If a link cannot be demonstrated, then the submitter’s proposal would be inconsistent with the NPSUD.

#### **4.1.2 Part 6 of the CRPS**

213. As will be discussed in Section 4.8 of this report, the effects of the submitter’s proposed zoning on the natural and physical resources of the Region can be minimised. This section explores whether the submitter’s zoning proposal would give effect to Part 6 of the CRPS from a growth management perspective.
214. I concur with Mr. Chrystal that Part 6 is somewhat of out-of-date with its focus on the recovery and rebuilding work following the Canterbury earthquakes and the development of new national guidance such as the NPSUD, NPS-FM and NPS-HPL. I note

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<sup>29</sup> Page 5 of “Understanding and implementing the responsive planning policies,” prepared by the Ministry for the Environment, dated September 2020.

<sup>30</sup> Page 6 of “Understanding and implementing the responsive planning policies,” prepared by the Ministry for the Environment, dated September 2020.

that the smart growth framework articulated within Part 6 of the CRPS is relevant and that this generally aligns with the policy direction of the NPSUD.

215. I agree with Mr. Chrystal that Objective 6.2.1(3) is a key assessment matter when considering whether a planning decision is consistent with Part 6 of the CRPS. Objective 6.2.1(3) states:

*“...avoid urban development outside of existing urban areas or greenfield areas for development, **unless expressly provided for in the CRPS.**”* (Emphasis added).

216. I agree with Mr. Chrystal that the submitter's zoning proposal can be contemplated as an *“urban development.....expressly provided for in the CRPS.”* In this case, I conclude that the submitter's proposal could be considered under Objectives 6.2.1(9) and 6.2.1(11), which seek to integrate land use with strategic infrastructure and to optimise the use of strategic infrastructure.

217. Accordingly, I share Mr. Chrystal's view that in principle, the zoning proposal could be considered under Policy 6.3.5, which implements Objective 6.2.1. However, following information is needed to confirm that as drafted, the proposed SPZ(RA) provisions could be considered under Part 6 of the CRPS:

- a) In relation to Area A, I am of the opinion that the submitter has not demonstrated how all the aircraft activities, at the scale and intensity enabled by the SPZ(RA) would *“...maintain or enhance the operational effectiveness, viability and safety”* of the airfield (Policy 6.3.5(2)(b)).
- b) From the information supplied, I am not convinced that the airside residential activities in Area B would *“...maintain or enhance the operational effectiveness, viability and safety”* of the airfield (Policy 6.3.5(2)(b)). Further information is also required to demonstrate how the subdivision of freehold titles in Area B would assist with maintaining the financial viability of the airfield.
- c) Further information is required on whether the enabled residential, commercial, and industrial capacity is needed to support the airfield and its strategic function. This would allow for submitter's proposal to be considered under Policy 3.5.1 of the CRPS. If a link cannot be demonstrated, then the submitter's proposal would be inconsistent with policy direction of Part 6 of the CRPS.

218. For completeness, I also provide the following comments with respect to Chapter 6 of the CRPS:

- a) The submitter's zoning proposal would integrate with existing and planned infrastructure (Policies 6.3.5(1) and 6.3.5(5)).
- b) Further information is required to understand whether all activities enabled by the submitter's zoning proposal, at the scale enabled, are appropriate from a transportation perspective, and would optimise the capacity of the existing network without requiring the network to be upgraded (Policy 6.3.4).
- c) The submitter has prepared an ODP, as sought by Policy 6.3.3 of the CRPS.
- d) Noise sensitive activities are appropriate within the 55 dBA LN, provided the inhabitants have a link to the airfield and related aircraft activities and provided

- that the airfield continues to operate with a similar aircraft mix during daylight hours in accordance with the conditions of WDC-1 (Policy 6.3.5(5)).
- e) As currently proposed, the SPZ(RA) may adversely affect the character and amenity of a rural area.
  - f) If not linked to or ancillary to the airfield, Area A would potentially be consistent to parts of Policy 6.3.6 that applies to the provision of Business Land within the Region. For instance:
    - (i) Area A would be close to both labour supply and strategic transport infrastructure (Policy 6.3.6(9)).
    - (ii) In principle, it is possible that Area A could be developed in a manner that does not detract from the function of other commercial centres. However, the planning framework needs to be refined to ensure that Area A is developed in a manner that is consistent with Policy 6.3.6 and in a manner that would not result in activities that would detract from other commercial centres.
    - (iii) Further information is required to understand whether the proposed SPZ(RA) provisions would be adequate to ensure that reverse sensitivity effects and conflicts between incompatible activities with Area A (e.g. industrial and a residential activity) are identified and avoided or mitigated against (Policy 6.3.6(8)).
    - (iv) Further information is required to understand whether the ODP has been master planned to incorporate good urban design principles in the context of the Rangiora Airfield, and whether the ODP and the proposed SPZ(RA) planning framework would achieve good urban design outcomes.
  - g) If not linked to or required to support the operation and development of the airfield, the airside development within Area B could result in rural residential development that would in some ways be contrary to Policy 6.3.9, acknowledging that the land is zoned RLZ in the Proposed Plan and therefore a denser rural living environment is considered appropriate to some degree outside the 55 dB LN noise contour. However, for completeness, I have evaluated Area B against all of Policy 6.3.9, should the Hearing Panel consider that there is not a strong enough link between the enabled residential lots and the airfield. In the below assessment, I have found that the Area B airside titles would not be entirely inconsistent with Policy 6.3.9:
    - (i) The SPZ(RA) would enable noise sensitive activities being located close to the airfield, and this is contrary to Policy 6.3.9(5)(a).
    - (ii) The submitter has demonstrated that it is possible to connect the airside residential lots to the reticulated water and wastewater systems, and that stormwater can be managed on site via the existing district-wide planning framework (Policy 6.3.9(3)). Likewise, the airside titles are

appropriate in terms of hazards and geotechnical stability matters (Policies 6.3.9(5)(h)).

- (iii) The airside titles will be located relatively close to an urban area, and it may be possible to integrate into the approved rural residential subdivision to the south of Priors Road (Policy 6.3.9(5)(k)).
- (iv) Further information is required to understand whether the ODP will be effective in mitigating adverse effects on rural character, as sought by Policy 6.3.9(6).
- (v) Further information is required to understand whether the proposed SPZ(RA) provisions would satisfactorily avoid and mitigate reverse sensitivity effects with adjacent rural activities (Policy 6.3.9(5)(g)).

#### **4.1.3 Conclusion**

219. I conclude that the submitter's zoning proposal can be considered by the Hearing Panel under both Part 6 of the CRPS and the NPSUD because in principle, the SPZ(RA) is unusual and not typical of what is contemplated under the NPSUS and CRPS. This is because the proposed zone is specific, and it is sought to support the operation and development of a strategic asset rather than to provide business and residential land capacity in a more general sense. However, further information is needed from the submitter to confirm that the scale and nature of development enabled by the draft SPZ(RA) provisions would be ancillary to the airfield.
220. There are also opportunities for the submitter to demonstrate with further information or to consider refinements to the proposed SPZ(RA) framework that would achieve outcomes with greater alignment with the NPSUD and Chapter 6 of the CRPS.

## **4.2 National Policy Statements**

### ***4.2.1 National Policy Statement on Highly Productive Land (NPSHPL)***

221. Mr Chrystal has considered the relevance of the NPSHPL within his planning evidence and concluded that the land subject to the submission is not deemed to be "highly productive land" despite some land having Class 3 soils. I agree with Mr Chrystal's assessment and note that this view is consistent with the statements expressed by other Council officers within the s42a report for Whaitua Taiwhenua – Rural Zones of the Proposed Plan.

### ***4.2.2 National Policy Statement for Fresh Water Management (NPSFM)***

222. The NPSFM contains the fundamental concept of Te Mana o te Wai. Te Mana o te Wai encompasses 6 principles relating to the role of tangata whenua and communities in the management of freshwater. There is a hierarchy of obligations in Te Mana o te Wai that prioritises:
- (a) *first, the health and well-being of water bodies and freshwater ecosystems*
  - (b) *second, the health needs of people (such as drinking water)*



(c) *third, the ability of people and communities to provide for their social, economic and cultural well-being now and in the future.*

223. This has been considered by Mr Chrystal within his planning evidence. I agree with the policies identified within paragraph 68 of his evidence and concur that the 100m buffer provides an adequate buffer between the Rakahuri/Ashley River and the built form within the airfield, and the proposed provisions of the zone will reinforce the setback condition within the designation.
224. In consideration of Māori values I note that there are no sites or areas of significance to Māori (SASM's) identified within the proposed plan for the subject site. The Proposed Plan includes an overlay for SASM 025 Ngā Wai, directly to the north. This schedule covers the Rakahuri river and its tributaries directly to the north of the site. The SASM's within the plan were identified by Ngāi Tahu through the plan review process and Rūnanga have been clear that the sites and areas identified within the Proposed Plan are a conclusive list. As the site is not subject to a SASM overlay within the Proposed Plan I do not consider further consideration of Mana Whenua values under the NPSFM is necessary.

#### **4.2.3 National Policy Statement – Indigenous Biodiversity (NPSIB)**

225. The NPSIB is not considered relevant to this proposal as the subject site is not known to contain any areas of indigenous biodiversity. I recognise that there may be areas of indigenous biodiversity present within the margins of the Rakuhuri/Ashley River, however these are outside of the proposed SPZ(RA) and would remain unaffected by activities occurring within the zone. Further to this the Rakahuri is not identified as a Significant Natural Area within the Ecosystems and indigenous biodiversity chapter of the Proposed Plan. Ultimately it is considered the NPSIB is not relevant to the submission and does not require further consideration.

#### **4.2.4 Conclusion**

226. For the reasons stated above, the NPSHPL and NPSIB are not considered relevant to the proposal. In considering the NPSFM, the site is located adjacent to the Rukuhuri/Ashley River which is a significant water body to the district. The proposed SPZ(RA) zoning will maintain a 100m buffer between the river margins and the built form, therefore it is considered the proposal maintain the principles of Te Mana o te Wai.

### **4.3 National Environmental Standards**

#### **4.3.1 National Environmental Standard for Sources of Human Drinking Water (NESDW)**

227. The site is partially within the Community Drinking Water Protection Zone (CDWPZ) for the drinking water supply well M35/6031 located at 337 Lehmans Road, Rangiora. It is understood from paragraph 77 of Mr Chrystal's evidence that this is an active water supply for the Rangiora Eco Holiday Park. The extent of the CDWPZ is shown in Figure 12 below.



**Figure 12 - Extent of the Community Drinking Water Protection Zone shown in purple (Source: Canterbury Maps)**

228. The purpose of the NESDW is to manage activities with the potential to affect drinking water supplies. In this instance a small portion of the site is within the CDWPZ therefore its appropriate to consider how activities proposed within this area of the SPZ(RA) may affect the drinking water supply.
229. The Canterbury Land and Water Regional Plan (cLWRP) includes specific provisions that control discharge activities within CDWPZs to ensure the NESDW is met. Activities within this zone will be required to meet these provisions as part of the future land use. It is therefore considered upholding the NESDW can be achieved through the implementation of these provisions.
230. Further to this I note that Mr Chrystal refers to intended upgrades to the reticulated drinking water network that would allow the Eco Holiday Park to connect into the Councils potable water network. These upgrades may circumvent the need for a separate community drinking water supply.
231. Based on the controls within the cLWRP that regulate activities within the CDWPZ I consider these provisions will ensure the NESDW continue to be met. I also note the establishment of a reticulated potable water supply for the area may make these standards not relevant in the future, although the implementation of this cannot be assumed.

#### **4.3.2 National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health (NES-CS)**

232. The land containing the Rangiora Airfield is included on Environment Canterbury's listed land use register as un-investigated HAIL activity in relation to the following land uses:
- ACT192 – Airports
  - ACT19513 – Storage tanks or drums for fuel, chemicals or liquid waste

233. It is unclear whether any of the area contained within the HAIL overlaps with proposed areas A or B of the subject land. Nevertheless, I consider that the NES-CS provides a consent pathway for the change of use of this land should it contain contaminants that are not permitted by the standards. Given this standard is in place I consider that the potential for contaminated soil can be appropriately addressed through the NES-CS during the subdivision and land use consenting process. Therefore, rezoning of the site would not be contrary to the NESCS.

#### **4.3.3 Conclusion**

234. I have considered the applicability of the relevant National Environmental Standards to the proposed special purpose zone and consider that future land use activities occurring within the proposed zone could be appropriately managed through the enforcement of the standards and the cLWRP. Therefore, the National Environment Standards do not present a barrier to allowing the SPZ(RA) rezoning to occur.

## **4.4 Regional Planning Documents**

### **4.4.1 Regional Policy Statement (CRPS)**

#### Chapter 5 – Land use and Infrastructure

235. I concur with Mr. Chrystal's assessment of Objective 5.2.1 *Location, design and function of development (Entire Region)* within paragraphs 83 and 84 of his evidence. Noting in particular:

- a) Rangiora Airfield is "strategic infrastructure." With significant amendment to the SPZ(RA) planning framework, the intensity and scale of business activities in Area A may be appropriate and could integrate with the operation of the airfield.
- b) The SPZ(RA) will enable development in an area that can be serviced, but significant amendment to the planning framework is needed to ensure that the SPZ(RA) development integrates with the transportation network.
- c) Residential development within Area A and Area B would promote lifestyle choice.
- d) Development has the capacity to be safe with the operation of regionally significant infrastructure.
- e) Development and subdivision of SPZ(RA) could be undertaken without affecting significant natural or landscape values.
- f) Noise sensitive activities are appropriate within the 55 dBA LN, provided the inhabitants have a link to the airfield and related aircraft activities and provided that the airfield continues to operate with a similar aircraft mix during daylight hours in accordance with the conditions of WDC-1.

#### Other chapters of the CRPS

236. It is considered that the matters covered in the objectives and policies of the other chapters of the CRPS have been addressed in other sections of this report. For instance:

- a) With respect to Chapters 2-4 of the CRPS, the submitter needs to provide further information regarding the outcomes of any consultation with mana whenua.

- b) With respect to Chapters 7 and 10 of the CRPS, it is considered that the potential adverse effects on freshwater resources can be managed through the existing statutory framework of the cLWRP and the NES-F. There are no freshwater resources on the land subject to the SPZ(RA).
- c) With respect to Chapter 11 of the CRPS, it is considered that from a natural hazards perspective, the land is appropriate for the development and activities enabled by the SPZ(RA). The potential risks associated with natural hazards can be adequately addressed via the district-wide provisions of the Proposed Plan.
- d) With respect to Chapter 12 of the CRPS, it is considered that the submitter needs to provide additional information to assess the potential landscape effects that may arise from the SPZ(RA) provisions. It is also suggested that the proposed standards may need to be refined to manage potential landscape/ visual effects arising from the SPZ(RA) provisions.
- e) With respect to Chapter 15 of the CRPS, it is considered that the proposed RLZ zoning has to some degree reduced the potential range of productive rural land uses envisaged that would rely upon the versatility of the soils by enabled commercial activities that do not rely upon the quality of the soil and by enabling smaller lot sizes than the RLZ. However, this is consistent with the NPS-HPL, which excludes the RLZ. The existing planning framework can be relied upon to manage the adverse effects from soil loss during the earthworks period.
- f) With respect to Chapters 17 and 18 of the CRPS, it is considered that the district wide provisions of the Proposed Plan and the NES-SC would adequately manage the adverse effects that may arise from contamination and the storage of hazardous substances.

#### **4.4.2 Conclusion**

237. It is concluded that the submitter needs to provide further information to assess whether it would meet all the relevant objectives and policies of the CRPS.

#### **4.4.3 Canterbury Land and Water Regional Plan (cLWRP)**

238. The cLWRP sets out provisions for the management of land and water resources within the region. It contains specific provisions around discharges of water and contaminants to land which may be relevant to the future land uses that will be permitted by the proposed zoning.
239. It is understood that the submitter has proposed lots in both area A and area B will connect to the Council's reticulated network and that discharges to land for Area B is unlikely to be required for residential based activities. As such it is considered the cLWRP will have limited applicability to Area B.
240. It's noted that the types of industrial activities proposed in Area A may trigger regional consenting requirements should on site waste disposal, discharge of industrial waste to land or storage of hazardous substances be proposed. Provisions are more stringent where the CDWPZ overlays the site in the southeast corner.

241. The zone has the ability to be serviced by a reticulated system without relying on discharge to land and the CLWRP contains provisions to appropriately manage any additional discharges proposed by activities that will be enabled within the proposed zoning for Area A.

#### 4.4.4 Conclusion

242. The cLWRP provides a framework for managing the discharges of water and contaminants. Based on the evidence of John Aramowicz (Council's Senior Civil and Geotechnical Engineer), it is understood that new future lots within the zone would have the ability to connect into Council services and therefore discharge to land is unlikely to be required under the cLWRP. Where discharge may be required in future, particularly in Area B, I consider the cLWRP provides an adequate framework to manage these activities.

### 4.5 National Planning Standards

243. I agree with Mr. Chrystal's conclusion that the 'special purpose zone' is appropriate and the criteria in Direction 3 of the National Planning Standards has been met.
244. I also note that the special purpose zone has been applied nationally as an underlying zone to designated infrastructure where there are unique requirements that do not comfortably align with the other zone descriptions in Table 13 of the National Planning Standards. These include:

a) Ardmore Aerodrome – Auckland Unitary Plan (Operative in Part).

The Ardmore Aerodrome is designated by Ardmore Airport Ltd, with an underlying zone of "*Special Purpose – Airports and Airfields.*" Overlaying the zone are two sub-precincts, one containing the airport and relating aircraft activities (sub-precinct Airport) and other exclusively containing residential units (sub-precinct Residential). I consider that the general approach applied at Ardmore to reflect that proposed by the submitter with Area A containing the airfield and related aircraft activities, and Area B containing residential titles. (Albeit the residential titles at Ardmore Aerodrome reflect a historic arrangement and that are not linked to the airfield but a taxiway).

b) Te Kowhai Airpark – Proposed Waikato District Plan – Appeals Version

The Te Kowhai Airpark is zoned "*Special Purpose – Te Kowhai Airpark zone*" under the Proposed Waikato District Plan – Appeals Version. It effectively separates the airfield and the surrounding landholdings that comprise the "airpark" into four sub-precincts, with one sub-precinct providing for aircraft operations, one sub-precinct providing for commercial activity that supports the airfield and aviation sector, and the other two precincts providing for residential activities (medium and low density).

c) Pauanui Beach Airfield – Thames Coromandel District Plan – Operative in Part

The Pauanui Beach Airfield is within the "Airfield Zone," along with the other airfields within the district, including the Whitianga Airfield and the Sir Keith Park Airfield in Thames. While not listed as a "special purpose zone" per se, the Airfield zone is effectively a special purpose zone that exists to meet the unique requirements of an airfield facility and is the underlying zone for a designated airfield.

Unlike the Te Kowhai Airpark and the Ardmore Aerodrome, the Airfield zone does not contain any precinct-like provisions that I am aware of.

245. In summary, I consider the use of a special purpose zone to implement the development and operation of aircraft activities would be consistent with the National Planning Standards and to be appropriate for measure to achieve the objective of the zone.
246. As there is no definition of "airfield" in the National Planning Standards, it is recommended that the submitter considers proposing a definition of "airfield" to assist with the interpretation of "airfield activities." "Airfield" is defined in the District Plans for the examples listed in paragraph 243 of this report.

## 4.6 Proposed Waimakariri District Plan (Proposed Plan)

### *Strategic Directions*

247. The Rautaki ahunga – Strategic Directions (SD) and Āhukatanga auaha ā tāone – Urban Development and Form (UFD) chapters provides the high-level / overarching objectives of the Proposed Plan. They provide policy direction for the more detailed chapters of the Proposed Plan, and they give effect to the National Policy Statements and the CRPS. It is therefore important that any amendments to the Proposed Plan (including any zoning requests), align with the objectives within the SD and UFD chapters.
248. In principle, the special purpose zoning provides a regulatory framework that is different from the other land use zones, which provides an avenue for the SPZ(RA) to be excluded from SD objectives that relate to a compact city form and multi-modal accessibility. The submitter has not requested any changes to SD chapter, however, in my opinion some changes would be necessary should the Hearing Panel grant the relief sought. I have suggested the amendments that would be necessary throughout the report.
249. I consider that the proposed SPZ(RA) and related amendments to the Proposed Plan to be partially consistent with the objectives of the SD chapter. I consider that:
- a) The relief sought by the submitter is entirely consistent with Objective SD-01 (Natural Environment). I consider that the potential adverse effects on the natural environment from SPZ(RA) development and activities can be adequately managed by the existing planning framework (such as the NESFM and the district-wide chapters of the Proposed Plan).
  - b) The submitter's proposal will increase the range of housing and business-related opportunities within the district, and this supports aspects of Objective SD-02. However, the purpose of the zone does not wholly align with Objective SD-02 because the zone would not consolidate development within an existing urban area. However, I do not see this as being problematic given the location of the airfield and the 'special purpose' of the SPZ(RA) that distinguishes the zone from urban zones. Should the IHP grant the relief sought by the submitter, I recommend that the IHP considers amending Objective SD-02 to reference the SPZ(RA) and its purpose in much the same way at the Special Purpose zone (Kāinga Nohonga). I consider that such a change would align the SPZ(RA) to Objective SD-02.
  - c) For similar reasons, I recommend that a minor amendment to Objective SD-04 (Rural Land) is needed to exclude the SPZ(RA). Objective SD-04 excludes the Special

Purpose Zone (Kāinga Nohanga) from the requirement to ensure that rural land remains available for rural production activities.

- d) In principle, the SPZ(RA) will not affect the operation of the Rangiora Airfield (i.e., strategic infrastructure), as sought by SD-03.
- e) Further information is needed about the scale and nature of the activities that would be enabled by the SPZ(RA) would not adversely affect the safe and efficient operation of the public road network, as sought by SD-03. The SPZ(RA) is contrary to the parts of SD-03 that improved access and multi-modal connectivity.
- f) The submitter has also demonstrated that there is no impediment to servicing the SPZ(RA) by extending the reticulated infrastructure from Rangiora. I understand that this would require the landowners to contribute towards the cost of extending the line and I understand that there is currently no funding agreement in place. (Further information on this would be useful). Accordingly, should the IHP grant relief to the submitter, I recommend that there is strong policy direction within the SPZ(RA) to make the proposed extension a precursor to the development of Areas A and B. It is very typical for a greenfield development have a standard that requires reticulated services to be operational prior to development consent.
- g) The submitter needs to outline the outcomes of mana whenua engagement. Without this information, I cannot conclude whether the relief that has been sought by the submitter would be consistent with SD-05.
- h) The submitter's zoning proposal is consistent with SD-06 because the existing district-wide measures are adequate to manage the effects and risks associated with natural hazards.

#### *Urban Form and Development (UFD)*

- 250. The UFD chapter contains two objectives to ensure that there is sufficient residential and business zoned land to meet demand. These objectives are supported by policies that relate to the consideration of new business or residential zoned land, or the increase in the capacity of business and residential zoned land.
- 251. Conceptually, the SPZ(RA) aligns with the high-level objectives and policies of the UFD chapter, because it is a zone with a specific purpose and this purpose distinguishes it from the broader residential / commercial / industrial zones that apply.
- 252. The unique purpose and character of the Special Purpose Zone (Kāinga Nohoanga) is recognised in policy UFD-P9. This policy is specific to the purpose of the zone and provides a pathway for the enabled activities to be considered in a different statutory context to the activities within residential, industrial and business zones. Should the IHP grant relief to the submitter, it is considered that the UFD chapter should be amended to include a policy that relates specifically to the unique purpose and character of the SPZ(RA). Such an amendment is necessary to provide a link between Objectives UFD-01 and UFD-02, and the objectives of the SPZ(RA).
- 253. Notwithstanding the above assessment, I have examined the submitter's zoning proposal against the objectives and policies of the UFD chapter and have found:

- a) Insufficient information has been provided to demonstrate that there is demand for airside residential activities outside of existing and identified urban areas. (There is sufficient land to meet forecasted residential requirements for 30-year horizon).
- b) Insufficient information has been provided to demonstrate that there is demand for airside commercial and light industrial activities at the scale and intensity proposed outside of existing and identified urban areas.
- c) There are no restrictions on the scale of commercial activities within the SPZ(RA) to serve passengers, visitors, and employees, which could result such activities undermining existing commercial centres.
- d) In principle, reverse sensitivity issues can be addressed by the proposed SPZ(RA) measures and by limiting the potential occupants to persons who are familiar with aircraft noise and operations.

#### *Energy and infrastructure (EI)*

254. Chapter EI mainly relates to the provision of network utilities, including reticulated water and wastewater infrastructure and electricity and telecommunications, and applies across all land use zones. The submitter has requested no changes to this chapter.
255. In my view, small changes to rule EI-R45 would be required to exclude development within the SPZ(RA) from connecting to reticulated stormwater infrastructure and to allow for stormwater to be managed onsite without resource consent.
256. The submitter may also wish to clarify whether it is their intention to connect all new buildings within the SPZ(RA) to reticulated water and wastewater infrastructure under rule EI-R45(1). It may be beneficial to provide onsite servicing arrangements until reticulated infrastructure becomes operational. (Also, it is not clear whether development within Area B would need to connect to reticulated services). Resource consent would be required for a discretionary activity to develop land with onsite servicing arrangements, including residential accessory buildings that are currently zoned RLZ.

#### *Transportation (TRAN)*

257. The TRAN chapter of the Proposed Plan contains provisions that generally apply to all activities that occur within the district. This includes formation requirements for roads and parking areas, and provisions that provide for the use and development of the Rangiora Airfield.
258. For the reasons outlined in Mr. Gregory's evidence, I consider that the regulatory framework within the TRAN chapter of the Proposed Plan is sufficient to manage most of the effects relating to the development and use of land within the SPZ(RA). However, as stated in paragraphs 307-308 of this report, with respect to airfield activities within Area A, the submitter does not propose any SPZ(RA) standards or any changes to TRAN-R20 (High Traffic Generators) that would allow the Council to assess the cumulative effects of activities on the safe and efficient operation of the surrounding road network. Without such controls, I consider that the SPZ(RA) may not be consistent with Objectives TRAN-01 and TRAN-04.



259. The submitter may wish to confirm that the Proposed Plan formation standards relating to private lanes (as opposed to the formation of public roads), are appropriate for the SPZ(RA) and the potential user groups, should be land not be subdivided and land vested with the Council for road).
260. I agree with Mr. Chrystal that the proposal is somewhat consistent with the objectives and policies of the TRAN chapter that seek to encourage alternative transportation modes and reduce vehicle emissions.
261. I agree that the proposed changes to TRAN-P16 are needed to give effect to the SPZ(RA). I agree that no changes are required to TRAN-O4 to give effect to the amended TRAN-P16. In my view it is appropriate to retain TRAN-O4 and TRAN-P16, and rule TRAN-R23 within the TRAN chapter as the Rangiora Obstacle Limitation Surfaces within TRAN-APP8 also apply to land beyond the SPZ(RA).

#### *Hazardous substances (HS)*

262. Mr. Chrystal has not assessed the SPZ(RA) against the HS chapter of the Proposed Plan that seeks to manage the environmental and human health risks that are associated with the use and storage of hazardous substances. As no changes are proposed to HS chapter provisions.
263. There are several aircraft activities that could use and store hazardous substances within the SPZ(RA) and these could be located close to sensitive activities (e.g. residential units). Further information is needed to understand the adequacy of the HS provisions to achieve HS01 and HS-02.

#### *Natural Hazards (NH)*

264. I agree with Mr. Chrystal that the changes to the NH chapter of the Proposed Plan would adequately manage the potential natural hazard effects.

#### *Subdivision (SUB)*

265. Notwithstanding the concerns that I have about the minimum lot size in Area B, I agree with Mr. Chrystal that the changes to the SUB chapter of the Proposed Plan would adequately manage the potential adverse effects of subdividing land within the SPZ(RA).
266. However, if no minimum lot size is appropriate for Area A, I have recommended the following consequential changes in Appendix 1:
- a) A minimum lot size applies for vacant lot subdivision to ensure that the created lots are of sufficient size to accommodate activities envisaged by the SPZ(RA); and
  - b) There is a control that requires that the land is subdivided in accordance with both the ODP and an existing or proposed land use development.
267. The submitter has proposed minor changes to SUB-MCD2 (Subdivision Design) that do not directly relate to the SPZ(RA), such as referencing notable trees and historic heritage, which are not present within the SPZ(RA). As the changes sought by the submitter would have wider implications for the subdivision of land within the district, I recommend that these changes be considered as part of the Subdivision topic.

*Earthworks (EW)*

268. I agree with Mr. Chrystal that the changes to the EW chapter of the Proposed Plan would adequately manage the potential adverse effects relating to earthworks within the SPZ(RA).

*Light (LIGHT)*

269. Information is required from the submitter to confirm whether the SPZ(RA) should be included in the Table 1 to manage the adverse effects of outdoor lighting. (For instance, from commercial and industrial activities within Area A and outside of the designated area).

*Noise (NOISE)*

270. The NOISE chapter of the Proposed Plan contains a planning framework that seeks to both manage noise to achieve anticipated levels of amenity values and to protect strategic infrastructure from complaint / reverse sensitivity issues relating to operational noise. As discussed in paragraph 167 of this report, the submitter proposes no substantive changes to the NOISE chapter. Only minor amendments are proposed to ensure that the NOISE chapter provisions will apply to subdivision and development within the SPZ(RA).
271. I concur with Mr. Chrystal that noise sensitive activities could be appropriate within the 55 dBA LN, provided the inhabitants have a link to the airfield and related aircraft activities and provided that the airfield continues to operate with a similar aircraft mix during daylight hours in accordance with the conditions of WDC-1. The requirement to register consent notices on the title of any new lots created within the SPZ(RA) has the capacity to effectively manage potential reverse sensitivity issues that may eventuate, but only when applied in combination with standards that link inhabitants to the airfield.
272. The internal acoustic amenity standards in Table 1 – NOISE-1 chapter of the Proposed Plan will achieve a reasonable standard of amenity. As stated in paragraph 338 of this report, the Hearing Panel may wish to amend those standards that apply to “other habitable rooms” so that a higher standard of internal amenity is provided within the contour area, and it aligns for what applies to noise sensitive activities in proximity to arterial routes.

## **4.7 Other Management Plans and Strategies**

### **4.7.1 Greater Christchurch Spatial Plan**

273. The Greater Christchurch Spatial Plan (GCSP) is a document that sets out how urban form within the greater Christchurch area should develop over time. It encompasses the Waimakariri District and was created in partnership with representatives from the Waimakariri Council.
274. The GCSP is a document that territorial authorities must have regard to when preparing or changing a district plan, as directed by S74(2)(b) of the RMA. Mr Chrystal has not included an assessment of the GCSP within his planning evidence, but I note at the time Mr Chrystal prepared his evidence the GCSP may have still be going through a special

consultative process under the Local Government Act and not yet been adopted by the Partnership.

275. The plan sets out how well-functioning urban environments will be achieved, and how sufficient housing and business development capacity will be provided to meet demand over the next 30 years. The spatial plan is considered the Greater Christchurch future development strategy for the purpose of the NPSUD.
276. The GCSP directs intensification to occur along existing centres and public transport corridors but also providing allowance for greenfield development opportunities where the below certain criteria is met:
1. *Be well connected with employment, services and leisure through public and active transport networks*
  2. *Be integrated with existing urban areas*
  3. *Meet a need identified by the latest Housing and Business Development Capacity Assessment*
  4. *Be at the right scale, density and location to minimise impact on highly productive land and existing permitted or consented primary production activities.*
277. The proposed zoning would be creating a new residential and business centre away from existing urban areas, but as outlined in my assessment of the NPSUD, I see these as peripheral issues if it can be demonstrated that the zone is required to support the development and operation of the airfield. The area is not connected to the rest of the district by public transport and vehicle access is anticipated to be the dominant transport mode. I note the adjacent Rakahuri/Ashley River includes a walking and cycling river trail that connects into the north of the Rangiora township. This provides an active transport connection to a nearby urban area as well as providing for recreation and leisure within proximity to the zone.
278. The Waimakariri Residential Capacity and Demand assessment<sup>31</sup> has identified that there is sufficient residential capacity within the Rangiora urban environment to provide for demand within the district in the long term<sup>32</sup>. Commercial and industrial capacity has also been considered as part of the development of the GCSP and development of the Proposed Plan. The capacity assessment has identified that the Waimakariri District has a surplus of commercial and industrial land supply available for development for the next 30 years<sup>33</sup>.
279. In considering the potential impact on highly productive land I note the NPSHPL is considered to have limited applicability to the proposed SPZ(RA) rezoning. The potential for the existing and permitted primary production activities to impact sensitive activities occurring within the SPZ(RA) is regulated by the inclusion of separation distance provisions within the Rural Zone. However, the proposed provisions of the SPZ(RA) have

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<sup>31</sup> Waimakariri Residential Capacity and Demand Model – IPI 2023

<sup>32</sup> 'Long term' is considered to be '2023-2053' within the Capability Assessment.

<sup>33</sup> Greater Christchurch Partnership Business Development Capacity Assessment, April 2023

not introduced equivalent provisions to manage potential reverse sensitivity effects created by sensitive activities occurring within proximity to new primary production activities. The implications of this are discussed in paragraph 345 below.

280. The zone would have limited connection to adjacent urban areas and would be occurring in isolation from existing urban centres. The potential for reverse sensitivity effects created by residential activities and rural primary production activities occurring in close proximity has not been addressed by the submitter or within the proposed provisions of the SPZ(RA).
281. Overall, I consider the proposal to rezone the site to SPZ(RA) is contrary to the Greenfield Development Opportunity Criteria and therefore the proposal is not consistent with the future development strategy of the Greater Christchurch Spatial Plan, and could only be considered favourably if the scale and intensity of the activities that would be enabled by the proposed zoning are needed to support the operation and development of the airfield, therefore setting it apart from a more general urban zoning. The submitter needs to provide further information to demonstrate the link.

#### **4.7.2 Mahaanui Iwi Management Plan**

282. The Mahaanui Iwi Management Plan represents the values of six Papatipu Rūnanga who hold manawhenua rights over the area as Te Rūnanga o Ngāi Tahu. The plan is based in Ngāi Tahu values and provides for the relationship between Ngāi Tahu and the natural resources of the whenua.
283. Mahaanui Kurataiao Limited were engaged as part of the Proposed Plan development. In accordance with Schedule 1, Clause 4A of the RMA, Mahaanui Kurataiao Limited provided advice on the Proposed Plan as an iwi authority and that advice was had regard to by the Council. Specific matters that were raised through the consultation process were addressed within the drafting of the Proposed Plan. No specific matters were raised about the airfield or the surrounding land subject to this submission.
284. I agree with the provisions of relevance to the proposal that Mr Chrystal has identified in paragraph 95 of his planning evidence. I also accept the previous engagement with Ngāi Tūāhuriri Rūnanga through the NoR process did not identify any sites of cultural significance.
285. Mr Chrystal's planning evidence notes that mana whenua has not yet been engaged through this submission process and that Mahaanui Kurataiao Limited have advised their preferred method of engagement is directly with Council to assess submissions. To this end I have taken advice from staff the Council who have advised that the Council has not engaged with Mahaanui Kurataiao Limited at the time of writing this report.
286. To the best of my knowledge at the time of writing this report, Mahaanui have not been engaged to consider this submission points. While I note the submission does not relate to any sites and areas of significance to Māori under Proposed Plan, I do not wish to preempt the views of mana whenua and therefore cannot draw any conclusion as to whether the SPZ(RA) and its proposed provisions would be considered by Ngāi Tūāhuriri Rūnanga to uphold the Mahaanui Iwi Management Plan.

### **4.7.3 2048 Waimakariri District Development Strategy (DDS)**

287. The DDS sets out the future growth strategy for the district over the next 30 years and emphasises the infrastructure (including the Rangiora Airfield) is critical for the sustainable development of the district. The strategy specifically references Christchurch International Airport as an example of how noise sensitive development can have a reverse sensitivity effect on existing infrastructure. This highlights the importance of integration between infrastructure and anticipated growth.
288. I agree with Mr Chrystal's statements within paragraphs 101-102 that co-location of airfield related business activities and ancillary support services would consolidate airfield related business activities within the area without undermining existing business areas or the growth of new business areas, provided that these businesses are of a scale that is ancillary to the airfield. I am not satisfied that this has been demonstrated.
289. Insufficient information has been provided to demonstrate that there is sufficient demand for residential lots / units in an airside location with links to the airfield and supporting aircraft activities enabled by the SPZ(RA). This is discussed in further detail under paragraphs 182-191.
290. Accordingly, I do not consider the activities that would be permitted by the SPZ(RA) are anticipated by the DDS.

### **4.7.4 Waimakariri Rural Residential Development Strategy**

291. The Rural Residential Development Strategy recognises that the Waimakariri District is under sustained pressure to provide for population growth and housing choice while balancing the protection of rural land for primary production. The purpose of the strategy is to provide a framework for how rural residential land use might be regulated under the District Plan provisions and to identify growth areas for this type of land use within the district.
292. In developing areas that may be appropriate for rural residential growth the strategy identified '*areas that would compromise the operational capacity of the Rangiora Airfield*' as a location that should be excluded from consideration. Likewise, '*avoid noise sensitive activities occurring within the 50 dBA Ldn air noise contour surrounding Christchurch International Airport*' was also considered a key factor in determining the location and design of any further residential development.
293. Accordingly, the strategy didn't consider the subject site as an area where rural residential growth should be located. However, the Proposed Plan has allowed for smaller scale rural land use and residential activities within the 'Rural Lifestyle Zone'. Therefore, I consider the strategy has limited applicability to the proposed SPZ(RA) and that consideration should focus on whether the intensity of the proposed residential land use is appropriate rather than the land use itself.

## **4.8 Assessment of Environmental Effects**

### **4.8.1 Positive Effects**

294. I agree with the submitter's experts that the submitter's zoning proposal would result in many positive effects, such as:

- a) With further consideration, the SPZ(RA) could provide for the continued operation and development of the Rangiora Airfield.
- b) The SPZ(RA) promotes lifestyle choice by providing for live-work opportunities within Area A. The airside residential units in Area B will be a unique offering that will have access to the runways via taxiways.
- c) As discussed by Mr. Groome, Mr McCleod, and Mr. Noad, the SPZ(RA) may support the local aviation industry and will therefore support local employment opportunities. (However, the submitter has not provided a detailed economic assessment that would assist with quantifying the purported benefits).
- d) As advised by Mr. Groome, the SPZ(RA) may support the financial position of the Rangiora Airfield that is currently subsidised by WDC. (However, further information is needed to explain how development within the SPZ(RA) would maintain the viability of the airfield).
- e) As advised by Mr. Metherell, the SPZ(RA) will facilitate the upgrade of Priors Road.

#### **4.8.2 Transportation effects**

##### *Submission*

295. The submitter has supplied an Integrated Transport Assessment (ITA) prepared by Andrew Metherell of Stantec Ltd. (The ITA is attached to the transportation evidence that was prepared by Andrew Metherell). Both the ITA and the evidence is dated 12 March 2024.
296. The ITA concludes<sup>34</sup>:
  - a) The surrounding road network is surrounded by road volume rural roads. No existing capacity or road safety issues were identified.
  - b) Based on the concept development plan attached with the submission, the scale of activity enabled by the rezoning could generate approximately 600 additional vehicle movements per day than the existing and consented activities, with most new development likely to obtain access from Merton Road and Priors Road.
  - c) The Merton Road / Priors Road and Merton Road / Oxford Road intersections can accommodate the increased levels of traffic. Surrounding local roads will not need to be reclassified from "local road."
  - d) The TRAN (Transport) provisions of the Proposed Plan will adequately manage the development and integration of the development into the surrounding road network (including new intersection design, pedestrian and cycling provision, and consideration of effects from larger developments).
  - e) An unsealed section of Priors Road may need to be sealed to accommodate small increases in traffic growth (both organic growth from current Proposed Plan zoning and from development enabled by the submitter's zoning proposal). The ITA

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<sup>34</sup> As summarised in Paragraphs 9-19 of Mr. Metherell's evidence.

recommends that this be considered as part of the development of the site, in response to the form and staging of development.

f) Enabled development is unlikely to warrant public transport provision.

297. Section 7.1 of the ITA estimates that the existing airfield activities generate 340 vehicle movements per day (vpd).

298. Paragraph 127 of Mr. Chrystal's evidence states that the submitter's zoning proposal will facilitate the realignment of Priors Road and sees this as a positive benefit.

#### Peer review

299. Mr. Mark Gregory of WSP has undertaken a peer review of the submitter's zoning proposal. Mr. Gregory has prepared transportation evidence which is attached to this report (**Appendix E**)

300. Mr. Gregory considers:

*"...there is insufficient information currently available in order to confidently understand the potential range of transportation effects, and how such effects could be mitigated, and the instruments (trigger points) through which effects can be managed or implemented.<sup>35</sup>"*

301. Mr. Gregory has also sought clarity around the future function of the airfield and how this may shape the scale and nature of services that may locate within SPZ(RA), with the resulting effects on traffic generation.

302. Mr. Gregory queries whether the vehicle generation rates applied in the submitter's ITA are over-simplified, given the full range of potential land uses and scale of activities that could occur within Area A under the proposed SPZ(RA) provisions.

303. Mr. Gregory has also queried which standard would apply to the construction of internal access lanes within Area A should the land not be subdivided.

#### Analysis

304. I rely on the expertise of Mr. Gregory regarding the adequacy of the submitter's ITA and consider it would be useful if the submitter provides further information on the future role of the airfield and the likely mix of airfield activities that may establish within Area A.

305. I share Mr. Gregory's opinion that there has been insufficient information provided on future role of the airfield and this makes it challenging to assess the effects that could result from the activities and services that could realistically establish to serve the airfield in its future state.

306. In this regard, I also note that the ITA traffic generation estimates for non-residential activities have been calculated from the concept plan that was attached to the submission and by applying a vpd rate that is comparable to that generated by the

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<sup>35</sup> Paragraph 9.5 of Mr. Gregory's evidence.

existing airfield buildings<sup>36</sup>. It is unclear from the ITA whether the concept plan is the one that was attached to the submission. If that is the case, there is no requirement in the SPZ(RA) that would require that the development proceeds in accordance with the concept plan or at the density shown in the concept plan.

307. I also note Mr. Gregory's concern that the SPZ(RA) framework for Area A is very permissive. There are standards that would control the scale and location of buildings, but there are no standards that would manage the scale of permitted aircraft activities or allow Council to consider the traffic effects of a larger scale activity. In my professional experience, light industrial and commercial activities can be very labour intensive and can occur within smaller buildings.
308. TRAN-R20 (High Traffic Generators) requires an ITA to be provided when an **activity** within the SPZ(RA) generates more than 250 vmpd and more than 50 hvmp (emphasis added). I am not aware of there being another mechanism within the PWDP that would enable consideration of the traffic related effects of smaller scale activities. As the resource requirement kicks in with each activity, not the site or the airfield, there is a potential for the incremental development of SPZ(RA) to lead to cumulative effects on the transportation network.
309. Based on the advice of Mr. Gregory, and current information available, I am not satisfied that the transport related effects of the submitter's zoning proposal can be adequately mitigated. I recommend that the submitter considers making changes to the SPZ(RA) provisions that would enable Council to assess transportation related effects through the resource consent process.
310. I agree with Mr. Gregory that insufficient information has been provided on whether Proposed Plan standards relating to formation of private accessways in Special Purpose zones (TRAN-S4) would apply to Area A, and whether this would be appropriate for the type of users and scale of land uses envisaged with the SPZ(RA).
311. I note that Mr. Gregory has commented on the relatively isolated nature of the SPZ(RA), the reliance on private vehicle travel, and the lack of information provided around the potential for live on site opportunities to reduce vehicle kilometres travelled. While I note this is a concern of Mr. Gregory, it is my view that the submitter's zoning proposal should not be declined on account of its location and the related vehicle emissions. (See Paragraph 201 of this report for discussion on the various plans and strategies to reduce vehicle emissions).

### **4.8.3 Landscape effects**

#### *Submission*

312. The submitter has supplied a Landscape Visual Assessment (LVA) prepared by Rory Langbridge of Rough Milne Mitchell Landscape Architects Ltd (dated 11 March 2024).
313. Mr. Langbridge has assessed the receiving environment as having moderate values with respect to rural character and amenity values, and low values regarding naturalness.

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<sup>36</sup> Section 7.2.1 of the ITA prepared by Stantec Ltd.



Amongst other things, Mr. Langbridge identifies the flat / treeless character and the presence of the airfield (including aircraft movements) as important attributes of the local landscape. Mr. Langbridge also notes the predominantly rural lifestyle land uses in the vicinity of the airfield, which have a modified character of buildings, fencing, hedge planting, etc.

314. The LVA concludes that the rezoning to SPZ(RA) is appropriate because the potential landscape and visual effects will be mitigated to some degree by:
- a) The proximity the site has to the Rangiora Airfield;
  - b) The isolated nature of the site;
  - c) The themed development, with all aspects of the development being related directly to the aviation industry; and
  - d) By the uniform and considered treatment of the perimeter boundary that will reinforce the area as a considered expansion of the aviation precinct.
315. In my view, the crux of Mr. Langbridge's position is that the SPZ(RA) is within a modified rural environment, of which the airfield is a dominant element. The ODP and related policies require new activities to be linked to the airfield, and this will ensure that development builds upon the character of the airfield.
316. Mr. Langbridge has also assessed how the character of the surrounding environment may change under the RLZ.

#### Peer review

317. Mr. Hugh Nicholson of Urbanshift Limited has undertaken a peer review of the submitter's zoning proposal on behalf of WDC.
318. Mr. Nicholson also agrees with Mr. Langbridge that the Area A development will mostly be in the vicinity of the Merton Road / Prior Road intersection and could replace the current rural character with *"...a range of activities that will have a more urban character with a strong residential / commercial and/ or industrial flavour."*
319. Mr. Nicholson goes on to state:
- "While I agree with Mr. Langbridge that not all landscape changes are adverse, given the changes in land use, the scale of the proposed built form and the visibility from public roads, I consider that this proposal could cause a significant change in landscape character and have a high degree of visual impact, adverse or otherwise."*
320. Mr. Nicholson also observes that there are limited SPZ(RA) provisions that would restrict the form or number of buildings that could establish within Area A and suggests that the proposed planning framework needs to be refined to avoid unintended consequences.
321. Mr. Nicholson agrees with Mr. Langbridge that the minimum 5,000m<sup>2</sup> lot size in Area B will retain some openness but could have significantly more of an 'urban' character than the RLZ. Mr. Nicholson notes that the subsequent subdivision would have road and taxiway hard surface movement networks, and that the 20% coverage figure would provide for residential units and large ancillary buildings (e.g. hangars). (There is no limit on the size of individual buildings as in the RLZ).

322. Mr. Nicholson is concerned that there is potential for the SPZ(RA) development to take on a village-like character:

*“Fifty households and a small cluster of shops, together with the surrounding rural residential housing and the commercial / industrial activities of the airport, might be considered to be more akin to a small urban settlement rather than an ‘airpark.’”*

323. Mr. Nicholson also notes that there is no structure planning or illustrative masterplan included and no design controls are proposed to control the appearance of buildings.

#### Analysis

324. I prefer Mr. Nicholson's assessment of landscape and visual effects.
325. I agree with Mr. Nicholson that there is merit zoning the airfield and land in the vicinity of the airfield for its continued operation and development. Therefore, in my mind, the question is not whether the land should be developed for purposes relating to the airfield, it is rather whether the scale and intensity of activities and development is appropriate to ensure that the adverse effects on the environment (including the landscape and people) are avoided, remedied, or mitigated. On this score, I agree with Mr. Nicholson that the SPZ(RA) provisions require further consideration.
326. I have also noted that there are few planning controls that relate to the scale and intensity of buildings and the diverse range of land use activities permitted within Area A, and I agree that there is potential for unintended consequences that could affect rural character and amenity if not appropriately managed.
327. I do not have sufficient information to understand whether Area B could offer a reasonable transition between the airfield and RLZ land, as proffered by Mr. Langbridge. I have relied upon the evidence of Mr. Nicholson who concludes that Area B could be more urban in character than the RLZ. In this regard, I agree that the visual effects relating to 20% of many 5,000m<sup>2</sup> sites being covered in buildings is likely to result in a loss in open space character when compared to the visual effects resulting from permitted buildings on a 4ha RLZ site (i.e., a building coverage of 8,000m<sup>2</sup> with a maximum building GFA of 550m<sup>2</sup>).
328. It likely that the residential sites in Area B would be developed as large sheds to store aircraft given their relationship to the airfield. I am of the view that it would be beneficial if the submitter provides information relating to the size of the hangars that would be typically needed to store light aircraft so that the adequacy of the proposed building standards can be assessed. In this regard, I note that most of the RLZ building standards have been rolled into Area B, except for RLZ-BFS6 (maximum GFA of a single building or structure shall be 550m<sup>2</sup>).
329. Based on the advice of Mr. Nicholson, and current information available, I am not satisfied that the landscape and visual related effects relating to the scale and intensity of buildings and activities enabled by the submitter's zoning proposal can be adequately mitigated. I recommend that the submitter considers includes controls that would allow the Council to consider adverse effects resulting from the number, size, and design of buildings, through a resource consent process. For example, considering whether there

is value to introduce a maximum building size control as applies under the current RLZ zoning.

#### **4.8.4 Noise and effects on airfield operations**

##### *Submission*

330. The submitter has supplied an Acoustic Assessment prepared by Rob Hay of Marshall Day Acoustics Ltd (dated 12 March 2024).
331. Mr. Hay considers that the submitter's zoning proposal will appropriately safeguard the amenity of the future occupants of the SPZ(RA), while also ensuring that the Rangiora Airfield is protected against reverse sensitivity effects<sup>37</sup>.
332. Mr. Hay acknowledges that he is generally opposed to establishing noise sensitive activities within the 55 dB LN contour but considers that residential amenity and reverse sensitivity matters can be satisfactorily managed through the proposed planning framework and by linking future inhabitants with the airfield and supporting aircraft activities<sup>38</sup>. As discussed in paragraphs 150-158 of this report, the proposed SPZ(RA) contains provisions that would:
- a) Require a no-complaints covenant placed on the title of newly created lots in Area A and Area B;
  - b) Require the 'airside residential' lots in Area A to have direct access to a taxiway with legal rights to the airfield; and
  - c) The purpose of the SPZ(RA) states that residential units in Area A would need to link to an aircraft activity (though this doesn't come through in the proposed objectives and policies or the standards that would apply to residential units).
333. These would be in addition to the district-wide acoustic insulation standards within Table NOISE-1 of the Proposed Plan that would apply to new residential units and additions to existing residential units. The submitter proposes no changes to Table NOISE-1.
334. Mr. Hay indicates that he would support any provisions that would more tightly align the occupancy of residential units within the 55 dBA LN contour to an aircraft activity or the airfield<sup>39</sup>.
335. Mr. Hay acknowledges that the noise contours would need to be amended when the runways are extended and notes that these can be achieved through a subsequent plan change / Notice of Requirement process.

##### *Peer Review*

336. Mark Lewthwaite of Powell Fenwick Ltd has undertaken a peer review of the submitter's zoning proposal on behalf of the Council (**Appendix F**).

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<sup>37</sup> Paragraph 3.2 of Mr. Hay's evidence.

<sup>38</sup> Paragraph 6.9 of Mr. Hay's evidence.

<sup>39</sup> Paragraph 3.4 of Mr. Hay's evidence.

337. Mr. Lewthwaite would normally not support establishing noise sensitive activities within the 55 dB LN noise contour, but generally agrees with Mr. Hay that the amenity and reverse sensitivity matters can be managed by the existing district-wide measures of the Proposed Plan and the proposed SPZ(RA) measures. Mr. Lewthwaite also agrees with Mr. Hay that the occupants of residential units may be familiar with and / or more accepting of the level of amenity if they are associated with an aircraft activity.
338. Mr. Lewthwaite comments on the adequacy of the internal acoustic levels in paragraphs 28-32 of his evidence. To better safeguard the amenity of future inhabitants of the residential units within the SPZ(RA), Mr. Lewthwaite recommends that the internal noise level that applies to "other habitable rooms" in Table NOISE-1 be lowered to 40 dB  $L_{Aeq}$  from 50 dB  $L_{Aeq}$ . This would align with the requirements for habitable rooms under NOISE-R16, which applies to residential units within 80m of an arterial road or rail designation.
339. Mr. Lewthwaite observes that the submitter has provided insufficient information on the noise that could be generated from aircraft taxiing in Area B and industrial activities that would occur at ground level within Area A (e.g. engine testing). Mr. Lewthwaite also notes that there has been no assessment of noise resulting from the permitted aircraft activities within Area A (which includes some industrial activities), or their effect on residential activities within the SPZ(RA) and the adjacent rural activities.

#### *Analysis*

340. I acknowledge that both Mr. Hay and Mr. Lewthwaite would not normally support establishing noise sensitive activities within the 55 dB LN noise contour but may be able to support noise sensitive activities within the 55 dB LN noise contour where a clear link to the airfield or aircraft activities can be demonstrated.
341. I concur that a link between airfield related activities and noise sensitive activities is important to mitigate reverse sensitivity effects and because internal acoustic standards can only go so far to achieve a reasonable standard of amenity. However, as stated in section 3.4 of this report, the submitter has provided insufficient information to demonstrate that there is demand from persons interested in aircraft to justify the number of airside units in Area B that are enabled by the SPZ(RA). The SPZ(RA) planning framework does not link occupants of residential units in Area B to the airfield or the aircraft activities enabled within Area A.
342. While I note that the proposed SPZ(RA) framework would ensure that all created lots will have a 'no complaints' consent notice registered on the title in favour of the Council, there is no requirement for the no complaints consent notice to also apply to the aircraft activities established within Area A outside of the designated area (including commercial and industrial activities). I therefore concur with Mr. Lewthwaite that insufficient information has been provided in relation to the management of noise between different land uses / internal property boundaries within the SPZ(RA), and between the SPZ(RA) and adjacent RLZ land.
343. Mr. Lewthwaite raised two concerns in paragraphs 21 and 27 of his evidence, which outside of my area of expertise, but could affect the administration and enforcement of a no complaints mechanism in the long-term. The submitter may wish to respond to in the hearing:

- a) The legal responsibility of landowners to inform tenants of a 'no complaints' mechanism; and
  - b) Whether the mechanism would apply to the changing operation of the airfield and any observable increases in noise related to the increase in air movements from when it was imposed on the title.
344. I have not formulated a view on whether the internal acoustic level for "other habitable rooms" in Table – NOISE-1 should be lowered in response to the SPZ(RA) proposal. In my opinion, this is a matter to consider as part of Stream 5 (Noise section).
345. I recommend that the noise contours are removed from the ODP because the submitter has not sought to change the extent of the 55 dB LN and 65 dB LN contours in the Proposed Plan maps.
346. In conclusion:
- a) I support the proposed consenting pathway for noise sensitive activities within the 55 dB LN and the reliance on no complaint mechanisms at subdivision stage and internal acoustic standards in Table-NOISE-1 that would apply for land use developments. However, it is suggested that the submitter provides further information on how the obligations transfer to tenants or would reasonably apply if there is a noticeable increase in aircraft noise.
  - b) The technical experts agree that it is critical that the occupants of residential units have a link to airfield activities. While I am satisfied that with minor amendments, the proposed planning framework could be adequate to ensure that such a link exists in Area A, there are no similar controls for Area B, and it is possible that the occupants of residential units in Area B may not be linked to an airfield related activity. Insufficient information has been provided by the submitter to demonstrate that there is demand for the number of airside titles that would be enabled within Area B.
  - c) The submitter has not provided sufficient information to understand how noise would be managed:
    - ii. Between sites and different land uses within Area A, including aircraft activities that occur outside of designation WDC-1, such as engine testing and taxiing aircraft. (It is noted by My. Lewthwaite that these could also occur at night outside of WDC-1).
    - iii. Between airside residential units in Area B and aircraft activities in Area A.
    - iv. Between activities in the SPZ(RA) and the amenity related effects on adjacent land uses within the RLZ zone.

#### **4.8.5 Reverse Sensitivity – Rural and industrial land uses**

347. The western, eastern and southern edge of the proposed SPZ(RA) will abut rural zoned land. Further information is required to understand whether the proposed setback controls in Area B would adequately avoid and mitigate the potential reverse sensitivity issues that could adversely affect the ongoing operation of existing productive rural land uses.

#### 4.8.6 *Vibrancy of Commercial / Industrial areas*

348. I agree with Mr. Chrystal that the SPZ(RA) provides a unique opportunity for commercial and industrial activities adjacent to an airfield and this would potentially provide an opportunity that would be replicated within land already zoned for industrial and commercial purposes. Commercial and industrial activities that are not related to or ancillary to the airfield requires resource consent for a discretionary activity under Section 87B of the RMA as it is not listed in the SPZ(RA) activity table.
349. The definition of “airfield activity” includes:
- “commercial and industrial activities associated with the needs of airfield passengers, pilots, visitors and employees and / or aircraft movements and airfield business.”*
350. It is considered that the definition of the “aircraft activity” could become problematic to administer and would inadequately limit the range of potential commercial and industrial activities to those with a link to the airfield, particularly as the airfield grows in the range of services and facilities offered. For instance, would an outlet store or a fast-food restaurant be acceptable in the SPZ(RA) should these activities identify that their target market is “visitors to the airfield?”
351. In my experience, this is the kind of unforeseen or unanticipated outcome that could eventuate, particularly as I suspect that the land within the SPZ(RA) may be more affordable than in existing urban areas or on land that is zoned for urban purposes.
352. Accordingly, I am unable to support the submitter’s zoning proposal without significant amendments. The submitter could consider the following:
- a) Limiting the type of commercial and industrial activities in the definition of the airfield activity.
  - b) Introducing standards that would limit the scale and / or number of certain industrial and or commercial activities that could establish without resource consent.
  - c) Introducing a separate line in the activity table that would require resource consent for commercial activities or certain commercial activities.
353. To further safeguard the function and viability of existing commercial and industrial areas, and better align with the purpose of the SPZ(RA), the submitter may wish to consider making commercial and industrial activities that are not related to or ancillary to the operation of the airfield a non-complying activity.

#### 4.8.7 *Public Safety / Airfield operations*

354. The submitter has provided technical evidence from Mr. Noad, Mr. Groome, and Mr. McLoed relating to the management and operation of the airfield, including an overview of civil aviation requirements and responsibilities under the New Zealand Civil Aviation

Authority (NZCAA) <sup>40</sup>. This evidence has not been peer reviewed by a civil aviation specialist.

355. It is understood that aircraft operations (including helicopters) are governed by the New Zealand Civil Aviation Authority (NZCAA). As the Council has responsibility for the airfield's safety management plan, I assume that as landowner and requiring authority the Council could ensure that buildings and activities are sited in a manner that complies with the NZCAA, but the submitter needs to provide clarity on this.
356. It is unclear whether the NZCAA would apply to the taxiing of aircraft within the SPZ(RA) and whether there are any specific requirements under the NZCAA that would affect where buildings and activities (e.g. residential units) could be located within the airfield (e.g. residential units)
357. Insufficient information has been provided to understand whether there are any contingency planning requirements under the NZCAA should there be an emergency at the airfield, and whether there would be any implications for the mix of activities that are proposed within the SPZ(RA).

#### **4.8.8 Servicing / Infrastructure Capacity**

358. I am satisfied that development enabled by the SPZ(RA) can be serviced by a future connection to the Rangiora reticulated water and wastewater services. Onsite stormwater management measures are appropriate.
359. The EI chapter can be relied upon to ensure that SPZ(RA) land is connected to reticulated water and wastewater services. If development proceeds ahead of reticulated services being available, resource consent would be required to service buildings / activities with onsite servicing (see paragraphs 254-256).
360. The submitter needs to provide further information on whether the SPZ(RA) can be serviced by electricity and telecommunication networks.

#### **4.8.9 Flood Effects**

361. Council's Senior Civil Engineer is satisfied that the flood hazard can be adequately managed by relying upon the existing district-wide provisions with the minor amendments that have been proposed by the submitter.

#### **4.8.10 Conclusion**

362. Overall, insufficient information has been provided to complete the assessment of environmental effects.
363. It has also been found that the proposed SPZ(RA) provisions need to be reconsidered and refined to provide the means for the Council to avoid, remedy and mitigate adverse effects and to ensure that a reasonable standard of onsite amenity is provided for persons residing within Area A.

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<sup>40</sup> Paragraphs 7-13 of Mr. Noads evidence.

## 5 Conclusions

364. The Council is in receipt of a submission by Mr. Daniel Smith [10] on the Proposed Plan. Mr. Smith seeks to rezone the Rangiora Airfield and adjacent land from Rural Lifestyle zone (RLZ) in the Proposed Plan to Special Purpose – Rangiora Airfield (SPZ(RA)). The SPZ(RA) would not apply anywhere else in the district, and it is intended to enable the operation and development of the airfield.
365. It was found that there are elements of the proposed SPZ(RA) provisions that fall outside the scope of Daniel Smith's original submission, and this may introduce issues of procedural fairness. This would need to be addressed by making amendments to the proposed planning framework. The general concept of the SPZ(RA) and most of the activities that the proposed zoning would enable are within the scope of the original submission.
366. Having considered all the information provided by the submitter, carried out an assessment of effects, reviewed all relevant statutory and non-statutory documents, I recommend that the submitter provides more information to demonstrate that the scale and intensity of the enabled activities would support the operation and development of the airfield. Without this information to demonstrate that there is a robust link between the enabled activities and the airfield, there is nothing to distinguish the SPZ(RA) from a more run-of-the-mill request to rezone land for urban purposes outside of existing urban areas and areas identified for growth, and the relief sought by the submitter would be contrary to the objectives and policies of statutory documents such as the NPSUD and Part 6 of the CPRS.
367. As proposed, the SPZ(RA) could also enable a scale of development that could, if fully realised, become the dominant land use to the airfield instead of being ancillary to the airfield now and under a likely growth scenario.
368. If the submitter can provide further information relating to this matter, then it is possible that with some refinement to the SPZ(RA) planning framework, the relief sought could be granted. Suggestions have been made through the body of the report for the submitter to consider that may tighten the link between the enabled activities and the airfield, mitigate adverse effects, and reduce the potential for outcomes that would be unintended or contrary to the objectives of the SPZ(RA) and the Proposed Plan.
369. If the above issues cannot be resolved, the requested SPZ(RA) zoning and other amendments to the Proposed Plan will not:
- Achieve the purpose of the Resource Management Act 1991 (RMA).
  - Achieve all the relevant objectives of the Proposed Plan, with respect to the proposed provisions.
  - Give effect to the NPSUD or Part 6 of the CRPS.



**Recommendations:**

I recommend that:

1. The Hearing Commissioners reject submission [10] unless the submitter provides information that includes:

*Scale, intensity, and nature of enabled land uses*

- Analysis of the demand for commercial / industrial land for airfield related purposes and for related residential activities.
- Information on the supply of land available within the current airfield to meet the identified demand for airfield activities.
- Analysis of the purported economic benefits of the enabled airfield activities, including those relating to employment.
- Information on the future role of the airfield / a formal long-term vision of the airfield.
- Information on whether there has been any master planning undertaken to date and whether that involved consultation with key user groups to determine the land use capacity sought by the SPZ(RA).

*Mana whenua*

- Outcomes of any mana whenua engagement.

*Infrastructure and servicing*


- An update on whether an approved funding agreement is in place to connect the airfield and Areas A and B to reticulated water and wastewater.
- Information on whether the enable SPZ(RA) development can be serviced by telecommunications and electricity infrastructure.
- An update on whether the subdivision R215364 has been given effect to and whether the Council has initiated the road stopping process under Schedule 10 of the Local Government Act 1974 with respect to Priors Road. Clarification on whether Priors Road needs to be straightened ahead of the SPZ(RA) being developed.

*Adverse Effects*

- Clarity on how the Proposed Plan (as amended by submission [10]) would achieve a reasonable standard of onsite amenity would be secured for occupants of residential units within Area A.
- Clarity on how the Proposed Plan (as amended by submission [10]) would achieve a reasonable standard of acoustic amenity would be secured between activities within the SPZ(RA) and adjacent land zoned RLZ.
- Clarity on how the Proposed Plan (as amended by submission [10]) would achieve a reasonable transition between the SPZ(RA) and adjacent RLZ land.

- Clarity on how the Proposed Plan (as amended by submission [10]) would manage the scale of industrial and commercial activities within Area A and the effects of traffic movements on the surrounding road network that would be generated by these activities.
2. I have not included an Appendix with recommended amendments to PDP provisions given my recommendations. The statement of Evidence of Mr Chrystal contains his recommended provisions within Appendix 1.
  3. I note that my recommendation may be confirmed or may be modified in the future s42A report / Council’s right of reply once I have reviewed any additional information provided by the submitter in response to the matters that I have identified within this report.

Signed:

Name and Title		Signature
Report Author	Bryce Powell	

## **Appendix A. Recommended Responses to Submissions and Further Submissions**

The recommended responses to the submissions made on this topic are presented in Table B 1 below.

Table B 1: Recommended responses to submissions and further submissions

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested (Summary)	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to Proposed Plan?
<b>Proposed SPZ(RA) provisions and consequential amendments to the district-wide provisions of the Proposed Plan</b>							
10.1	Daniel Smith	General	Establish a Special Purpose Airport zone at Rangiora Airfield and surrounding land bounded by Priors Road and Merton Road to accommodate residential and commercial activities shown in attachments SPARZ-001 and 002.	All	Reject	See body of the report.  Insufficient information has been provided from Submitter 10 to support changing the zone from RLZ to a Special Purpose Airport zone.	No
286.12	4Sight Consulting Ltd on behalf of Z Energy Limited	Planning Maps	Support Rural Lifestyle Zone and designation WDC-1 for Rangiora Airfield as this will provide for the continuation of airfield related activities at the site.	1.6	Accept	Agree with submitter. Retain Proposed Plan zoning as notified.	No

**Appendix B.****Report Author's Qualifications and Experience**

I hold the following qualifications: Bachelor of Resource and Environmental Planning (BRP) from Massey University. I am an intermediate member of the New Zealand Planning Institute, and I am also a member of the Resource Management Law Association. I have more than 20 years' experience in working as a planner for local government and consultancies.

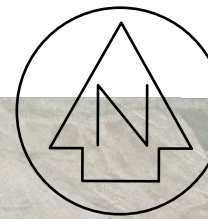
My work experience includes, amongst other matters, preparing applications for resource consent, plan change requests for private clients, and Notices of Requirement and Outline Plan of Works for requiring authorities.

I also worked as a Senior Planner and later a Team Leader for Auckland Council between 2011 and 2018 in the resource consents team, during which I worked in the legacy Papakura District Council area where the Ardmore Aerodrome operates within a rural area that is a short distance from urban Auckland. The Ardmore Aerodrome is a busier facility than the Rangiora Airfield, with an asphalt runway and various supporting business and education activities authorised by special purpose zoning under the Auckland Unitary Plan – Operative in Part.

I have been employed by Harrison Grierson since February 2018 as a Senior Planner and I have held Team Leader responsibilities since 2022.

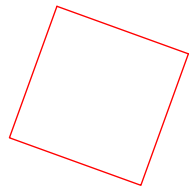



**Appendix C.**

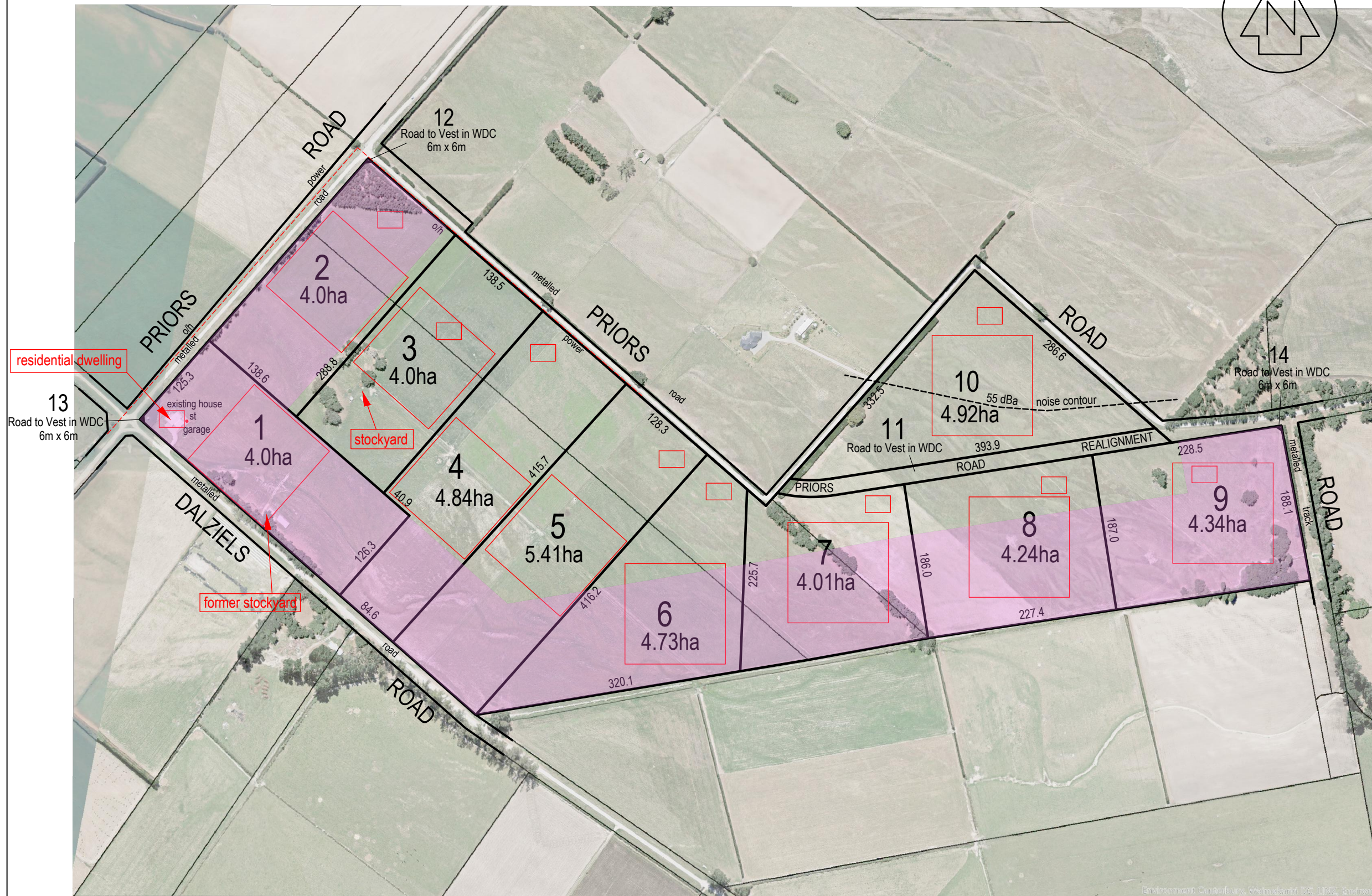
**Resource Consent Decision  
RC215363 & RC215364**



- NOTES :**
1. THIS SURVEY HAS NOT INCLUDED SITE MARKING OF THE BOUNDARY POSITIONS UNLESS OTHERWISE INDICATED.
  2. NO UNDERGROUND SERVICE INFORMATION IS SHOWN ON THIS PLAN. THE LOCATION OF ANY SUCH SERVICES SHOULD BE CONFIRMED WITH THE RELEVANT LOCAL AUTHORITY OR UTILITY SERVICE PROVIDER.
  3. SCHEME PLAN ONLY, AREAS & DIMENSIONS ARE APPROXIMATE & SUBJECT TO FINAL SURVEY.

**LEGEND**

-  120m x 120m SHAPE FACTOR
-  30m x 20m HOUSE SITE
-  EFFLUENT BUFFER ZONE
-  stockyard HAIL SITES



**WAIMAKARIRI DISTRICT COUNCIL**  
 - APPROVED APPLICATION -  
 RC215364  
 APPROVED by Authorised Officer  
 Wendy Harris 15/10/2021



4 Meadow Street, PO Box 5558, Papanui, Christchurch  
 P 03 352 5599 AMBERLEY 03 314 9200  
 F 03 352 5527 ASHBURTON 03 307 7021  
 TOLL FREE 0508 787 887 DARFIELD 03 318 8151

REV	DATE	REVISION DETAILS	SRS
B	23/06/21	FOR SUBDIVISION CONSENT	SRS
A	16/06/21	FOR SUBDIVISION CONSENT	SRS

DRAFTED SRS	VERIFIED
APPROVED	
DATE	

PROJECT	DM & AD SMITH INVESTMENTS - FERNSIDE
TITLE	PROPOSED SUBDIVISION OF PT RS 10471, PT RS 5928 & RS 5655 RT's CB712/75 LTD, CB28F/687 & CB380/133 LTD

INFORMATION ONLY	
PROJECT NO 15022	
SCALE 1:5000 (A3)	SIZE A3
DRAWING NO SC-01	REV B

Our Reference: RC215364 / 211015167192  
Valuation Reference: 2159102400

15 October 2021

Scope Resource Management Limited  
57 Camwell Park  
RD 1  
**KAIAPOI 7691**

Dear Garry,

**DECISION ON RESOURCE CONSENT APPLICATION  
DM & AD SMITH INVESTMENTS LIMITED - 181 PRIORS ROAD, FERNSIDE**

Please find enclosed a copy of the decision reached by the Officer under delegated authority from the Council on the above application.

Yours faithfully,



Samantha Kealey  
**SENIOR PLANNER**

Encl

CC: DM & AD Smith Investments Limited  
315 Flaxton Road  
Rangiora 7400



**WAIMAKARIRI DISTRICT COUNCIL**

**IN THE MATTER** of the Resource Management Act 1991

**AND**

**IN THE MATTER** of an application lodged by **DM & AD Smith Investments Limited** for a resource consent under Section 88 of the aforementioned Act.

**APPLICATION**

The applicants sought a resource consent to create 10 lots, plus lots to vest as road, from three underlying titles comprising a total of 45.53 hectares.

Access will be via Priors and Dalziels Roads, with a new road to vest linking Priors Road. Servicing will be via on-site wells and septic tanks.

The application site is located immediately south of the Rangiora Airfield, in the Rural Zone, approximately 2.2 kilometres to the north-west of Rangiora township. Rangiora airfield has been subject to a recent Notice of Requirement process which has resulted in a designation area and 65dBA and 55dBA noise contours. Lot 10 is partially within the 55dBA noise contour. To the east is an area of several 4 hectare lifestyle blocks, while to the south and west are generally larger farming use lots, although there are scattered 4 hectare lots.

**DECISION**

The Delegated Officer, on the 15<sup>th</sup> October 2021, approved:

**Subdivision – RC215364**

**THAT** pursuant to Section 104C of the Resource Management Act 1991, consent be granted to subdivide RS 5655, Pt RS 5928 and Pt RS 10472 into ten rural lots (Lots 1-10) and four lots to vest as road (Lots 11-14) at 181 Priors Road, Fernside, as a restricted discretionary activity subject to the following conditions which are imposed under Section 108 of the Act:

1. **Application Plans**
  - 1.1 The activity shall be carried out in accordance with the attached approved application plan stamped RC215364.
  
2. **Standards**
  - 2.1 All stages of design and construction shall be in accordance with the following standards (and their latest amendments) where applicable:

- Waimakariri District Council Engineering Code of Practice
- Waimakariri District Council Stormwater Drainage and Watercourse Protection Bylaw (2018)
- Erosion & Sediment Control Toolbox For Canterbury
- NZS 4404:2010 Land Development and Subdivision Infrastructure
- NZS 4431:1989 Earthfill for Residential Development
- National Code of Practice for Utility Operator's Access to Transport Corridors (10 September 2015 with amendment 16 September 2016)
- MOTSAM - Manual of Traffic Signs and Markings
- New Zealand Transport Agency standards
- Relevant Austroads Guides & Standards
- New Zealand Drinking Water Standards 2005 (Revised 2018)

### 3. **Easements**

- 3.1 All services, including open drains and access ways, serving more than one lot or traversing lots other than those being served and not situated within a public road or proposed public road, shall be protected by easements. All such easements shall be granted and reserved.

### 4. **Vesting of Assets**

- 4.1 Lots 11 to 14 inclusive, shall be vested as Road Reserve in Waimakariri District Council at the time of the 224(c) Conditions Certificate issue.

### 5. **Power and Telephone**

- 5.1 The Consent Holder shall provide evidence in writing from the relevant service utility provider(s) that existing electrical and telephone reticulation has the capacity to provide service connection to Lots 2 to 10 inclusive. If wired telecommunication reticulation is unavailable or extension of wired reticulation is shown to be cost prohibitive, the Consent Holder shall provide evidence in writing from a service provider of their choice, that 4G Broadband has capacity to provide a service connection to Lots 2 to 10 inclusive.

### 6. **Water Supply**

- 6.1 The Consent Holder shall provide an adequate and secure domestic water supply, providing a minimum of 2.0 m<sup>3</sup>/day for Lots 2 to 10 inclusive.
- 6.2 The Consent Holder shall either confirm the water supply from any future wells on Lots 2 to 10 inclusive as potable or shall prove that the water can be readily made potable by recognised and practical treatment methods to the satisfaction of the Council. Water quality tests carried out by an IANZ accredited Laboratory, demonstrating chemical and bacteriological compliance with the Guideline Values (GV) and the Maximum Allowable Values (MAV) published in the "Drinking Water Standards for New Zealand 2005 (Revised 2018)" shall be submitted to the Council. Testing shall be undertaken to the Waimakariri District Council test suite. Samples from the water source shall be taken by an Independent Qualified Person (IQP) with accreditation of Unit Standard 17890: to undertake sampling and testing procedures for water treatment.

- 6.3 The Consent Holder shall supply flow tests demonstrating that a minimum of 2.0m<sup>3</sup> per day can be supplied to each of Lots 2 to 10 inclusive.
- 6.4 Prior to the erection of a dwelling on Lots 2 to 10 inclusive the property owner shall construct a new well in accordance with the following minimum requirements:
- The top of the well bore casing shall be a minimum of 400mm above the surrounding ground level or 100mm above the 200 year Local Flood Hazard depth, whichever is greater.
  - The bore casing shall be sealed to in situ soil below the surface with bentonite, so as to ensure no surface water or contaminants can enter underlying groundwater.
  - The bore head shall be encased by a concrete pad of 100mm minimum thickness which shall project a minimum of 300mm from the perimeter of the bore casing. The concrete pad shall be formed so as to shed water away from the bore casing and terminate flush with the surrounding ground level. Concrete placed shall be a minimum 20 MPa strength at 28 days.
  - The bore head shall be capped and all penetrations sealed so as to prevent contaminants entering the bore and underlying ground water.
  - A sample point and back-flow preventer shall be installed on the bore riser so as to prevent contaminants siphoning back into the bore and underlying ground water.
- 6.5 Conditions 6.1 to 6.4 (inclusive) shall be subject to a consent notice, pursuant to Section 221 of the Resource Management Act 1991 and shall register on the record of title for Lots 2 to 10.
- 6.6 The Consent Holder shall either confirm the water supply from the existing well on Lot 1 as potable or shall prove that the water can be readily made potable by recognised and practical treatment methods to the satisfaction of the Council. Water quality tests carried out by an IANZ accredited Laboratory, demonstrating chemical and bacteriological compliance with the Guideline Values (GV) and the Maximum Allowable Values (MAV) published in the “Drinking Water Standards for New Zealand 2005 (Revised 2018)” shall be submitted to the Council. Testing shall be undertaken to the Waimakariri District Council test suite. Samples from the water source shall be taken by an Independent Qualified Person (IQP) with accreditation of Unit Standard 17890: to undertake sampling and testing procedures for water treatment.
- 6.7 The Consent Holder shall confirm the capacity of the water well on Lot 1 by undertaking a well pump test, which demonstrates to the satisfaction of Council, that the quantity of water available from this existing well can adequately supply the water requirements of the lot. The test shall be submitted to Council for approval.
- 6.8 The existing well in proposed Lot 1 shall be upgraded in accordance with the following minimum requirements:

- The bore head shall be encased by a concrete pad of 100mm minimum thickness which shall project a minimum of 300mm from the perimeter of the bore casing. The concrete pad shall be formed so as to shed water away from the bore casing and terminate flush with the surrounding ground level. Concrete placed shall be a minimum 20 MPa strength at 28 days.
- The bore head shall be capped and all penetrations sealed so as to prevent contaminants entering the bore and underlying ground water.

A sample point and back-flow preventer shall be installed on the bore riser so as to prevent contaminants siphoning back into the bore and underlying ground water.

## 7. **Traffic Management Plan**

- 7.1 The Consent Holder shall submit for approval a Traffic Management Plan detailing traffic control works (including sketch layout and control signs). This plan shall be submitted prior to work commencing in road reserves. Management shall be to Level 1, as described in the NZTA Code of Practice for Temporary Traffic Management.

## 8. **Roading**

- 8.1 The Consent Holder shall upgrade Priors Road from the Dalziels Road intersection to the western intersection with proposed Lot 11 (future road to be constructed by the applicant) and then from the eastern end of proposed Lot 11 to the eastern end of proposed Lot 9.

The upgrade shall comprise widening of Priors Road to a width of 6m as per Rural Local Road standard. The Consent Holder shall also construct on either side of the widened road a 1.25m metal course shoulder along both sides of the road to give a total road width of 8.5m, swales along both sides of the road and soak pits located at approximately 100m intervals apart along both sides of the road. The proposed design shall be in general accordance with WDC standard drawing 600-270 Issue D and intersections designed in accordance with WDC standard drawing 600-261A Issue F. The final proposed road design shall be provided to council for approval prior to works commencing within the road reserve.

- 8.2 The Consent Holder shall pay a financial contribution of \$199,739.19 (including GST at 15%) for the required formation of the realigned section of Priors Road (i.e. along proposed Lot 11).

- 8.3 That, prior to signing of the 224(c) certificate, the consent holder shall provide evidence to demonstrate that the realigned section of Priors Road (i.e. within Lot 11) has been constructed to a sufficient standard that all-weather access is available to Lot 8.

## 9. **Environmental Management**

- 9.1 Prior to any works commencing on site the Consent Holder shall provide an Environmental Management Plan (EMP) to the Council for approval. The EMP shall detail the methodology of works and the environmental controls in place

to limit effects from issues involving flooding, dust, noise and other pollutants.

- 9.2 Any required amendments to the EMP as a result of adverse site conditions shall be submitted in writing to Council.
- 9.3 The Consent Holder shall take measures to control silt contaminated stormwater at all times during earthworks and roading development work. Details of the proposed controls shall be included in an Erosion and Sediment Control Plan (ESCP) which will form part of the Environmental Management Plan to be submitted to Council for approval in writing.
- 9.4 The Consent Holder shall be responsible for installing and maintaining any sediment control devices, protection of the existing land drainage and waterways, and making regular inspections, repairs and changes to the proposed measures as required.

## 10. **Maintenance**

- 10.1 The Consent Holder shall be responsible for the maintenance of all subdivision and associated works (excluding reserves, street trees, and landscaping) which are to be vested in Council for a period of twelve months from the date of issue of the 224(c) Conditions Certificate. A bond equal to 5% + GST of the cost of construction works shall be lodged with Council for the same period.

## 11. **Earthworks**

- 11.1 During all earthworks and roading construction work the Consent Holder shall employ dust containment measures, such as watering, to avoid off site nuisance effects created by dust.
- 11.2 The Consent Holder shall ensure all construction operations shall be limited to 7 am to 6 pm Monday to Saturday. No construction work shall take place on Sundays or Public Holidays.
- 11.3 The Consent Holder shall ensure all rubbish, organic or other unsuitable material shall be removed off site to an approved disposal facility where this material can be legally disposed of.

## 12. **“As-Built”**

- 12.1 The Consent Holder shall provide daily site earthworks records for the road upgrade and beam test results as part of the “As-Built” record, to enable accurate RAMM records to be established for the new road construction.
- 12.2 The Consent Holder shall provide an asset register for all assets to be vested in Council, swales and soakpits and the like. The asset register shall include construction costs.
- 12.3 Where “As-Built” plans have been prepared using computer aided draughting techniques a copy of the file shall be made available to the Council in either of the following formats - Microstation (.DGN), Autocad (.DWG), or (.DXF). The two sets of plans shall be provided at a scale of 1:1000 and 1:500.

12.4 The Consent Holder shall ensure the supervising Engineer/Surveyor supplies to Council a certificate signed by a Chartered Professional Engineer, stating that all works and services associated with the subdivision and roading works have been installed in accordance with the approved engineering plans and specifications and that the "As-Built" plans are a true and accurate record of all works and services as constructed. This certificate shall be supplied prior to requesting the Section 224(c) Conditions Certificate.

13. **Supervision and Setting Out**

13.1 The Consent Holder shall, prior to the commencement of any works, engage a Chartered Professional Engineer or Registered Professional Surveyor, to manage the construction works including ensuring a suitably qualified person oversees all engineering works and setting out.

13.2 The Consent Holder shall ensure the supervising Engineer/Surveyor submits a programme of inspection intended to meet the requirements of Condition 13.1 at the time of submitting the engineering plans and specifications.

13.3 The Consent Holder shall ensure the supervising Engineer/Surveyor forwards to Council copies of site inspection notes for all site supervision visits. These shall be forwarded within five working days of the date of the site visit.

13.4 Certificates shall be given to the Waimakariri District Council for all testing undertaken. Copies of the certificates shall be forwarded to Waimakariri District Council every ten working days.

14. **Plans and Specifications**

14.1 The Consent Holder shall forward with the design, engineering plans and specifications copies of any other consents granted in respect of this subdivision.

14.2 Any subsequent amendments to the design, plans, and specifications shall be submitted to Council for approval, in writing, prior to undertaking the amended works.

14.3 The Consent Holder shall ensure the supervising Engineer / Surveyor supplies a certificate signed by a Chartered Professional Engineer to the Council stating that all works have been designed in accordance with the appropriate standards.

14.4 The Consent Holder shall ensure the supervising Engineer / Surveyor supplies a certificate signed by a Chartered Professional Engineer to the Council stating that all works have been designed in accordance with the appropriate standards.

15. **Finished Floor Levels**

15.1 The Consent Holder shall ensure that the minimum floor level of any dwellinghouses erected on proposed Lots 1 to 10 inclusive is;

- set no lower than 400mm above undisturbed ground at any point intersecting the building footprint and located outside Councils mapped 1 in 200 year (0.5% AEP) Flood Hazard Areas.
- set no lower than 400 mm above the modelled 1 in 200 year (0.5% AEP)

Flood Depth where the building footprint is located within a Low (Green) Flood Hazard Area.

- set no lower than 500 mm above the modelled 1 in 200 year (0.5% AEP) Flood Depth where the building footprint is located within a Medium (Blue) Flood Hazard Area.
- Building is prohibited in a High (Red) 1 in 200 year (0.5% AEP) Flood Hazard Area.

15.2 Condition 15.1 shall be subject to a consent notice, pursuant to Section 221 of the Resource Management Act 1991 and shall register on the record of title for Lots 1 to 10.

16. **Conditions Auditing**

16.1 The Council, on an actual cost basis, shall audit compliance with the conditions of consent by both site inspections and checking of associated documentation to ensure the work is completed in accordance with the approved plans and specifications and to the Council's standards. The Council will undertake inspections and checking.

16.2 For audit inspections required by the consent, the Consent Holder shall notify the Council Development Team at least 24 hours prior to commencing various stages of the works, preferably by email to [subdivaudit@wmk.govt.nz](mailto:subdivaudit@wmk.govt.nz) including subdivision and contractor/agent contact details or by phone on 0800 965 468.

16.3 The minimum level of inspection shall be as follows:

Water

- On completion.

Roading

- On completion of excavation to sub-grade.
- Following compaction of base course prior to final surfacing.

Access

- On completion of excavation to sub-grade.
- Following compaction of base course prior to final surfacing.

Whole Works

- Prior to issue of a Conditions Certificate under Section 224(c) of the Resource Management Act 1991.

16.4 Where repeat inspections are required because of faulty workmanship or work not being ready contrary to the receipt of a notification, such inspections will be carried out on the same charging basis as the normal inspections.

17. **Works Condition**

- 17.1 A completion of conditions certificate under Section 224(c) of the Resource Management Act 1991 will not be issued until conditions 1 to 16 above have been met to the satisfaction of the Waimakariri District Council, at the expense of the Consent Holder.

**ADVICE NOTES**

- (a) This activity has been granted resource consent under the Resource Management Act 1991. It is not a consent under any other Act, Regulation or Bylaw. The activity must comply with all relevant council bylaws, the Building Act 2004 and any other relevant laws and regulations. If you require other approvals, such as a building consent or vehicle crossing permit, please visit Council's website for application forms.
- (b) Prior to any future dwellings being established the property owner may be required to install an onsite sewage disposal system. A discharge consent may be required from Environment Canterbury.
- (c) Requirements and conditions listed are a statement of the Council's minimum standards. Where the Consent Holder proposes higher standards or more acceptable alternatives these shall be submitted to the Council in writing for approval.
- (d) Development contributions apply to this subdivision. These will be levied in accordance with the Council's Development Contributions Policy. Development Contributions will be advised in a letter separate to the resource consent decision. Payment of development contributions is required prior to the completion of the 224(c) process, under section 208 of the Local Government Act 2002.
- (e) The Erosion & Sediment control Toolbox for Canterbury can be found on the ECan website link <http://esc Canterbury.co.nz/>
- (f) The requirement for power and telephone to be confirmed as having capacity to service the subdivision does not guarantee that power or telephone connections are provided to potential allotments. On rural lots, the service authorities will not install submains to individual lots until the location of the house site is determined. Prospective purchasers of these lots should be advised to contact the relevant service authorities to ascertain the likely costs of servicing any specific lots to the purchaser's requirements.
- (g) The Consent Holder is advised that Traffic Management Plan forms can be sourced from Council Service Centres or on-line at: <https://www.waimakariri.govt.nz/home>
- (h) The Consent Holder is advised that vehicle access to any lot must comply with the requirements of the Waimakariri District Vehicle Crossings Bylaw 1997. Wherein no vehicle may be taken onto any property in the Waimakariri District other than by way of a properly formed vehicle crossing. The owner or occupier of any lot who may require vehicular access across any footpath,



berm and water channel adjoining that lot is required to apply in writing to the Council to construct a vehicle crossing at the owner's or occupier's cost. No owner or occupier of any lot can build, or allow to be built, any dwelling, other significant building or any part of such a building on any property unless the building site on that property is provided with adequate site access in terms of the above mentioned by law.

- (i) The Consent Holder is required to submit a 'Stockwater Application' Form for works associated with Council or Waimakariri Irrigation Limited water races. <https://www.waimakariri.govt.nz/home>
- The Consent Holder is advised this consent does not include the stock water race culvert installation as stock water races are managed by Waimakariri Irrigation Limited (WIL). Properties that contain or border a water race are required to submit a Stockwater Application Form to Council prior to the following activities taking place:
- Application to take stockwater for domestic irrigation.
  - Application to plant within 10 metres either side of a water race.
  - Application to erect a building or structures of any kind within 10 metres of a race.
  - Application to put in a pond.
  - Application to put in a culvert on a water race.
  - Application to divert a water race.

## **REASONS FOR DECISION**

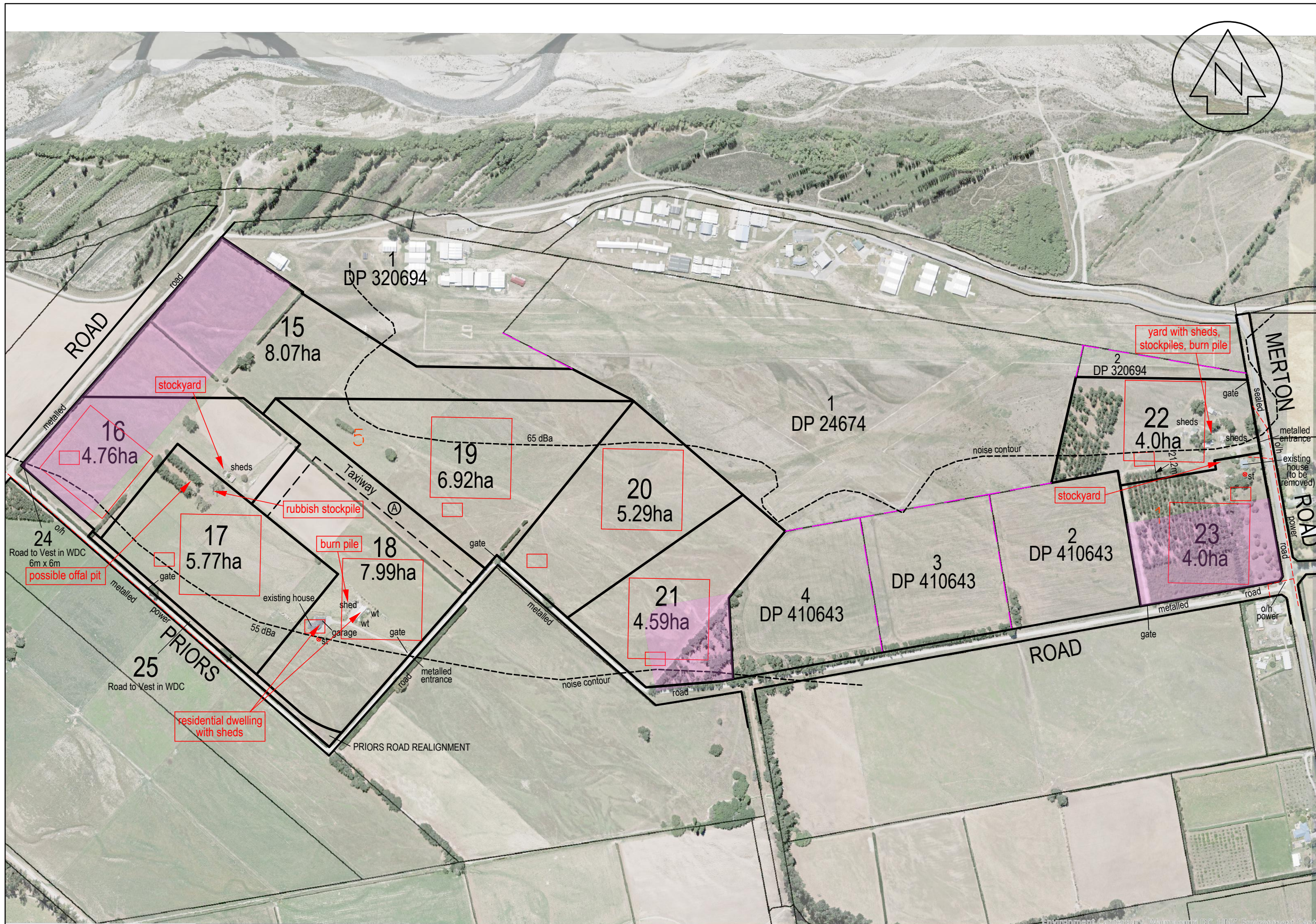
Pursuant to Section 113 of the Act the Council was satisfied that:

- No person is deemed to be adversely affected by the proposal.
- The environmental effects will be less than minor, for the following reasons:
  - Rural character and amenity will be maintained.
  - Safe access can be provided.
  - Flood hazard can be avoided or mitigated.
  - There are no on-site geotechnical constraints.
  - Water supply and sewer can be appropriately provided for.
- Environment Canterbury's records show no discharge consents relating to the effluent spreading buffer shown over the subject site. Therefore the effluent spreading area and associated setback are not based on required consent approvals, the setback impacting on the site is not valid, and no land use consent is required under the Waimakariri District Plan.
- The proposal is in accordance with the operative and proposed District Plan Objectives and Policies.

DATED at Rangiora this 15<sup>th</sup> Day of October 2021



SIGNED by Samantha Kealey  
**SENIOR PLANNER**



**NOTES :**

1. THIS SURVEY HAS NOT INCLUDED SITE MARKING OF THE BOUNDARY POSITIONS UNLESS OTHERWISE INDICATED.
2. NO UNDERGROUND SERVICE INFORMATION IS SHOWN ON THIS PLAN. THE LOCATION OF ANY SUCH SERVICES SHOULD BE CONFIRMED WITH THE RELEVANT LOCAL AUTHORITY OR UTILITY SERVICE PROVIDER.
3. SCHEME PLAN ONLY, AREAS ARE APPROXIMATE & SUBJECT TO FINAL SURVEY.

**LEGEND**

- 120m x 120m SHAPE FACTOR
- 30m x 20m HOUSE SITE
- EFFLUENT BUFFER ZONE
- stockyard HAIL SITES

**WAIMAKARIRI DISTRICT COUNCIL  
- APPROVED APPLICATION -  
RC215363  
APPROVED by Authorised Officer  
Wendy Harris 15/10/2021**

**MEMORANDUM OF EASEMENTS**

Nature	Servient Tenement		Dominant Tenement
	Lot No.	Shown	
Right to operate aircraft (taxiway)	18	A	16,17,19



4 Meadow Street, PO Box 5558, Papanui, Christchurch  
 P 03 352 5599      AMBERLEY 03 314 9200  
 F 03 352 5527      ASHBURTON 03 307 7021  
 TOLL FREE 0508 787 887      DARFIELD 03 318 8151

REV	DATE	REVISION DETAILS	SRS
C	29/06/21	FOR SUBDIVISION CONSENT	SRS
B	23/06/21	FOR SUBDIVISION CONSENT	SRS
A	16/06/21	FOR SUBDIVISION CONSENT	SRS

DRAFTED SRS	VERIFIED
APPROVED	
DATE	

PROJECT	
DM & AD SMITH INVESTMENTS - FERNSIDE	
TITLE	
PROPOSED SUBDIVISION OF LOTS 1 & 5 DP 410643 RT's 439708 & 439709	

INFORMATION ONLY	
PROJECT NO 15018	
SCALE 1 : 6000 (A3)	SIZE A3
DRAWING NO SC-01	REV C

Our Reference: RC215363 / 211015167402  
Valuation Reference: 2159102200

15 October 2021

Scope Resource Management Limited  
57 Camwell Park  
RD 1  
**KAIAPOI 7691**

Dear Garry,

**DECISION ON RESOURCE CONSENT APPLICATION  
DM & AD SMITH INVESTMENTS LIMITED - 172 PRIORS ROAD, FERNSIDE**

Please find enclosed a copy of the decision reached by the Officer under delegated authority from the Council on the above application.

Yours faithfully,



Samantha Kealey  
**SENIOR PLANNER**

Encl

CC: DM & AD Smith Investments Limited  
315 Flaxton Road  
Rangiora 7400

**WAIMAKARIRI DISTRICT COUNCIL**

**IN THE MATTER** of the Resource Management Act 1991

**AND**

**IN THE MATTER** of an application lodged by **DM & AD Smith Investments Limited** for a resource consent under Section 88 of the aforementioned Act.

**APPLICATION**

The applicants sought a resource consent to create 9 lots, plus lots to vest as road, from two underlying titles comprising a total of 51.95 hectares.

A dwelling is located on Lot 18 of 172 Priors Road and Lot 23 of 207 Merton Road, with associated curtilage and services located in close proximity to each dwelling. The dwelling at 207 Merton Road is to be removed. Several sheds are located within the sites. Formal access to each dwelling is from Merton Road and Priors Road. Current land use is grazing. Servicing will be via on-site wells and septic tanks.

The application site is located immediately south of the Rangiora Airfield, in the Rural Zone, approximately 2.2 kilometres to the north-west of Rangiora township. Rangiora airfield has been subject to a recent Notice of Requirement process which has resulted in a designation area and 65dBA and 55dBA noise contours impacting on all lots of the proposed subdivision. To the east is an area of several 4 hectare lifestyle blocks, while to the south and west are generally larger farming use lots, although there are scattered 4 hectare lots.

**DECISION**

The Delegated Officer, on the 15<sup>th</sup> October 2021, approved:

**Subdivision – RC215363**

**THAT** pursuant to Section 104C of the Resource Management Act 1991, consent be granted to subdivide Lot 1 DP 410643 and Lot 5 DP 410643 into nine rural lots (Lots 15 to 23) and two lots to vest as road (Lots 24 and 25) at 172 Priors Road, Fernside, as a restricted discretionary activity subject to the following conditions which are imposed under Section 108 of the Act:

**THAT** pursuant to Regulation 10(2) of the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011, consent be granted to subdivide Lot 1 DP 410643 and Lot 5 DP 410643 into nine rural lots at 172 Priors Road, Fernside, as a restricted discretionary activity subject to the following conditions which are imposed under Section 108 of the Act:

1. **Application Plans**

- 1.1 The activity shall be carried out in accordance with the attached approved application plan stamped RC215363.

2. **Standards**

- 2.1 All stages of design and construction shall be in accordance with the following standards (and their latest amendments) where applicable:

- Waimakariri District Council Engineering Code of Practice
- Waimakariri District Council Stormwater Drainage and Watercourse Protection Bylaw (2018)
- Erosion & Sediment Control Toolbox For Canterbury
- NZS 4404:2010 Land Development and Subdivision Infrastructure
- NZS 4431:1989 Earthfill for Residential Development
- National Code of Practice for Utility Operator's Access to Transport Corridors (10 September 2015 with amendment 16 September 2016)
- hMOTSAM - Manual of Traffic Signs and Markings
- New Zealand Transport Agency standards
- Relevant Austroads Guides & Standards
- New Zealand Drinking Water Standards 2005 (Revised 2018)

3. **Easements**

- 3.1 All services, including open drains and access ways, serving more than one lot or traversing lots other than those being served and not situated within a public road or proposed public road, shall be protected by easements. All such easements shall be granted and reserved.

4. **Vesting of Assets**

- 4.1 Lots 24 and 25 shall be vested as Road Reserve in Waimakariri District Council at the time of the 224(c) Conditions Certificate issue.

5. **Power and Telephone**

- 5.1 The Consent Holder shall provide evidence in writing from the relevant service utility provider(s) that existing electrical and telephone reticulation has the capacity to provide service connection to Lots 15 to 17 and 19 to 22 inclusive. If wired telecommunication reticulation is unavailable or extension of wired reticulation is shown to be cost prohibitive, the Consent Holder shall provide evidence in writing from a service provider of their choice, that 4G Broadband has capacity to provide a service connection to Lots 15 to 17 and 19 to 22 inclusive.

6. **Water Supply**

- 6.1 The Consent Holder shall provide an adequate and secure domestic water supply, providing a minimum of 2.0 m<sup>3</sup>/day for Lots 15, 16, 17, 19, 20, 21 and 22.

- 6.2 The Consent Holder shall either confirm the water supply from any future wells on Lots 15, 16, 17, 19, 20, 21 and 22 as potable or shall prove that the water can be readily made potable by recognised and practical treatment methods to the satisfaction of the Council. Water quality tests carried out by an IANZ accredited Laboratory, demonstrating chemical and bacteriological compliance with the Guideline Values (GV) and the Maximum Allowable Values (MAV) published in the “Drinking Water Standards for New Zealand 2005 (Revised 2018)” shall be submitted to the Council. Testing shall be undertaken to the Waimakariri District Council test suite. Samples from the water source shall be taken by an Independent Qualified Person (IQP) with accreditation of Unit Standard 17890: to undertake sampling and testing procedures for water treatment.
- 6.3 The Consent Holder shall supply flow tests demonstrating that a minimum of 2.0m<sup>3</sup> per day can be supplied to each of Lots 15, 16, 17, 19, 20, 21 and 22.
- 6.4 Prior to the erection of a dwelling on Lots 15, 16, 17, 19, 20, 21 and 22 the property owner shall construct a new well in accordance with the following minimum requirements:
- The top of the well bore casing shall be a minimum of 400mm above the surrounding ground level or 100mm above the 200 year Local Flood Hazard depth, whichever is greater.
  - The bore casing shall be sealed to in situ soil below the surface with bentonite, so as to ensure no surface water or contaminants can enter underlying groundwater.
  - The bore head shall be encased by a concrete pad of 100mm minimum thickness which shall project a minimum of 300mm from the perimeter of the bore casing. The concrete pad shall be formed so as to shed water away from the bore casing and terminate flush with the surrounding ground level. Concrete placed shall be a minimum 20 MPa strength at 28 days.
  - The bore head shall be capped and all penetrations sealed so as to prevent contaminants entering the bore and underlying ground water.
  - A sample point and back-flow preventer shall be installed on the bore riser so as to prevent contaminants siphoning back into the bore and underlying ground water.
- 6.5 Conditions 6.1 to 6.4 (inclusive) shall be subject to a consent notice, pursuant to Section 221 of the Resource Management Act 1991 and shall register on the record of title for Lots 15, 16, 17, 19, 20, 21 and 22.
- 6.6 The Consent Holder shall either confirm the water supply from the existing wells on Lots 18 and 23 as potable or shall prove that the water can be readily made potable by recognised and practical treatment methods to the satisfaction of the Council. Water quality tests carried out by an IANZ accredited Laboratory, demonstrating chemical and bacteriological compliance with the Guideline Values (GV) and the Maximum Allowable Values (MAV) published in the “Drinking Water Standards for New Zealand 2005 (Revised 2018)” shall be submitted to the Council. Testing shall be undertaken to the Waimakariri District Council test suite. Samples from the water source shall

be taken by an Independent Qualified Person (IQP) with accreditation of Unit Standard 17890: to undertake sampling and testing procedures for water treatment.

6.7 The Consent Holder shall confirm the capacity of the water wells on Lots 18 and 23 by undertaking a well pump tests, which demonstrates to the satisfaction of Council, that the quantity of water available from this existing well can adequately supply the water requirements of 2.0m<sup>3</sup> per day per lot. The test shall be submitted to Council for approval.

6.8 The existing well in proposed Lots 18 and 23 shall be upgraded in accordance with the following minimum requirements:

- The bore head shall be encased by a concrete pad of 100mm minimum thickness which shall project a minimum of 300mm from the perimeter of the bore casing. The concrete pad shall be formed so as to shed water away from the bore casing and terminate flush with the surrounding ground level. Concrete placed shall be a minimum 20 MPa strength at 28 days.
- The bore head shall be capped and all penetrations sealed so as to prevent contaminants entering the bore and underlying ground water.

A sample point and back-flow preventer shall be installed on the bore riser so as to prevent contaminants siphoning back into the bore and underlying ground water.

## 7. **Traffic Management Plan**

7.1 The Consent Holder shall submit for approval a Traffic Management Plan detailing traffic control works (including sketch layout and control signs). This plan shall be submitted prior to work commencing in road reserves. Management shall be to Level 1, as described in the NZTA Code of Practice for Temporary Traffic Management.

## 8. **Vehicle Crossings**

8.1 The existing vehicle crossing serving Lot 22 shall be upgraded and sealed to accord with the requirements of the Waimakariri District Council Engineering Code of Practice Standard Drawing 600-217 Issue D.

8.2 The existing vehicle crossing to Lot 23 shall be upgraded and sealed to accord with the requirements of the Waimakariri District Council Engineering Code of Practice Standard Drawing 600-217 Issue D.

8.3 The existing vehicle crossing serving Lot 19 located at the bend of Priors Road shall be upgraded to an all-weather standard and formed in accordance with the requirements of the Waimakariri District Council Engineering Code of Practice Standard Drawing 600-217 Issue D, excepting the 'culvert / channel or bridge' shall have the pipe size 'directed by the Council 'as '300mm minimum diameter with headwalls to proposed Lot 19 to meet manufacturer's specifications.

The existing table drains/swales shall be re-graded as required to provide a free outfall.

8.4 The Consent Holder shall Clegg Hammer test the access/all accesses prior to final surfacing. A measured Clegg Impact Value of at least 25 for footpaths and residential crossings shall be obtained to assure adequate compaction and pavement strength prior to sealing. Documentation shall be supplied to Council confirming the test results obtained.

9. **Roading**

9.1 The Consent Holder shall upgrade Priors Road from the eastern boundary of proposed Lot 21 to the intersection of Priors Road and Merton Road. The upgrade shall comprise widening of Priors Road to a width of 6m as per Rural Local Road standard. The Consent Holder shall also construct on either side of the widened road a 1.25m metal course shoulder along both sides of the road to give a total road width of 8.5m, swales along both sides of the road and soak pits located at approximately 100m intervals apart along both sides of the road.

9.2 The proposed design shall be in general accordance with Waimakariri District Council standard drawing 600-270 Issue D and intersections designed in accordance with Waimakariri District Council standard drawing 600-261A Issue F. The final proposed road design shall be provided to council for approval prior to works commencing within the road reserve.

10. **Environmental Management**

10.1 Prior to any works commencing on site the Consent Holder shall provide an Environmental Management Plan (EMP) to the Council for approval. The EMP shall detail the methodology of works and the environmental controls in place to limit effects from issues involving flooding, dust, noise and other pollutants.

10.2 Any required amendments to the EMP as a result of adverse site conditions shall be submitted in writing to Council.

10.3 The Consent Holder shall take measures to control silt contaminated stormwater at all times during earthworks and roading development work. Details of the proposed controls shall be included in an Erosion and Sediment Control Plan (ESCP) which will form part of the Environmental Management Plan to be submitted to Council for approval in writing.

10.4 The Consent Holder shall be responsible for installing and maintaining any sediment control devices, protection of the existing land drainage and waterways, and making regular inspections, repairs and changes to the proposed measures as required.

11. **Maintenance**

11.1 The Consent Holder shall be responsible for the maintenance of all subdivision and associated works (excluding reserves, street trees, and landscaping) which are to be vested in Council for a period of twelve months from the date of issue of the 224(c) Conditions Certificate. A bond equal to 5% + GST of the cost of construction works shall be lodged with Council for the same period.



12. **Earthworks**

- 12.1 During all earthworks and roading construction work the Consent Holder shall employ dust containment measures, such as watering, to avoid off site nuisance effects created by dust.
- 12.2 The Consent Holder shall ensure all construction operations shall be limited to 7 am to 6 pm Monday to Saturday. No construction work shall take place on Sundays or Public Holidays.
- 12.3 The Consent Holder shall ensure all rubbish, organic or other unsuitable material shall be removed off site to an approved disposal facility where this material can be legally disposed of.

13. **“As-Built”**

- 13.1 The Consent Holder shall provide daily site earthworks records for the road upgrade and beam test results as part of the “As-Built” record, to enable accurate RAMM records to be established for the new road construction.
- 13.2 The Consent Holder shall provide an asset register for all assets to be vested in Council, swales and soakpits and the like. The asset register shall include construction costs.
- 13.3 Where “As-Built” plans have been prepared using computer aided draughting techniques a copy of the file shall be made available to the Council in either of the following formats - Microstation (.DGN), Autocad (.DWG), or (.DXF). The two sets of plans shall be provided at a scale of 1:1000 and 1:500.
- 13.4 The Consent Holder shall ensure the supervising Engineer/Surveyor supplies to Council a certificate signed by a Chartered Professional Engineer, stating that all works and services associated with the subdivision and roading works have been installed in accordance with the approved engineering plans and specifications and that the “As-Built” plans are a true and accurate record of all works and services as constructed. This certificate shall be supplied prior to requesting the Section 224(c) Conditions Certificate.

14. **Supervision and Setting Out**

- 14.1 The Consent Holder shall, prior to the commencement of any works, engage a Chartered Professional Engineer or Registered Professional Surveyor, to manage the construction works including ensuring a suitably qualified person oversees all engineering works and setting out.
- 14.2 The Consent Holder shall ensure the supervising Engineer/Surveyor submits a programme of inspection intended to meet the requirements of clause 14.1 at the time of submitting the engineering plans and specifications.
- 14.3 The Consent Holder shall ensure the supervising Engineer/Surveyor forwards to Council copies of site inspection notes for all site supervision visits. These shall be forwarded within five working days of the date of the site visit.
- 14.4 Certificates shall be given to the Waimakariri District Council for all testing undertaken. Copies of the certificates shall be forwarded to Waimakariri District Council every ten working days.

15. **Plans and Specifications**

- 15.1 The Consent Holder shall forward with the design, engineering plans and specifications copies of any other consents granted in respect of this subdivision.
- 15.2 Any subsequent amendments to the design, plans, and specifications shall be submitted to Council for approval, in writing, prior to undertaking the amended works.
- 15.3 The Consent Holder shall ensure the supervising Engineer / Surveyor supplies a certificate signed by a Chartered Professional Engineer to the Council stating that all works have been designed in accordance with the appropriate standards.
- 15.4 The Consent Holder shall ensure the supervising Engineer / Surveyor supplies a certificate signed by a Chartered Professional Engineer to the Council stating that all works have been designed in accordance with the appropriate standards.

16. **Finished Floor Levels**

- 16.1 The Consent Holder shall ensure that the minimum floor level of any dwellinghouses erected on proposed Lots 15 to 23 inclusive is;
- set no lower than 400mm above undisturbed ground at any point intersecting the building footprint and located outside Councils mapped 1 in 200 year (0.5% AEP) Flood Hazard Areas.
  - set no lower than 400 mm above the modelled 1 in 200 year (0.5% AEP) Flood Depth where the building footprint is located within a Low (Green) Flood Hazard Area.
  - set no lower than 500 mm above the modelled 1 in 200 year (0.5% AEP) Flood Depth where the building footprint is located within a Medium (Blue) Flood Hazard Area.
  - Building is prohibited in a High (Red) 1 in 200 year (0.5% AEP) Flood Hazard Area.
- 16.2 Condition 16.1 shall be subject to a consent notice, pursuant to Section 221 of the Resource Management Act 1991 and shall register on the record of title for Lots 15 to 23.

17. **Contaminated Materials**

- 17.1 A report prepared by Kirk Roberts titled "172 & 181 Priors Road, Fernside, Rangiora, Detailed Site Investigation, JOB No. 2110390", dated 11 June 2021 (Council reference: Trim No. 210709112029) identifies areas of contaminated land on Lot 22 and Lot 23, being stockyard areas and burn pits. The locations of the contaminated land are identified in the report and shown on the plan titled 'Figure 2: Site Layout'. Prior to any earthworks, further subdivision, or change of use of the land within the identified areas that does not comply with the requirements of the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011, the consent holder shall ensure that:
- (a) A Remedial Action Plan (RAP) and Site Validation Report (SVR) are

prepared by a suitably qualified and experienced practitioner detailing the remediation and validation requirements of the contaminated soils.

(b) Copies of the RAP and SVR are provided to Waimakariri District Council and Environment Canterbury.

17.2 Condition 17.1 shall be subject to a consent notice pursuant to Section 221 of the Resource Management Act 1991 to be registered on the Records of Title for Lot 22 and Lot 23.

## 18. **Conditions Auditing**

18.1 The Council, on an actual cost basis, shall audit compliance with the conditions of consent by both site inspections and checking of associated documentation to ensure the work is completed in accordance with the approved plans and specifications and to the Council's standards. The Council will undertake inspections and checking.

18.2 For audit inspections required by the consent, the Consent Holder shall notify the Council Development Team at least 24 hours prior to commencing various stages of the works, preferably by email to [subdivaudit@wmk.govt.nz](mailto:subdivaudit@wmk.govt.nz) including subdivision and contractor/agent contact details or by phone on 0800 965 468.

18.3 The minimum level of inspection shall be as follows:

### Water

- On completion.

### Roading

- On completion of excavation to sub-grade.
- Following compaction of base course prior to final surfacing.

### Access

- On completion of excavation to sub-grade.
- Following compaction of base course prior to final surfacing.

### Whole Works

- Prior to issue of a Conditions Certificate under Section 224(c) of the Resource Management Act 1991.

18.4 Where repeat inspections are required because of faulty workmanship or work not being ready contrary to the receipt of a notification, such inspections will be carried out on the same charging basis as the normal inspections.

## 19. **Works Condition**

19.1 A completion of conditions certificate under Section 224(c) of the Resource Management Act 1991 will not be issued until conditions 1 to 18 above have been met to the satisfaction of the Waimakariri District Council, at the expense of the Consent Holder.

## **ADVICE NOTES**

- (a) This activity has been granted resource consent under the Resource Management Act 1991. It is not a consent under any other Act, Regulation or Bylaw. The activity must comply with all relevant council bylaws, the Building Act 2004 and any other relevant laws and regulations. If you require other approvals, such as a building consent or vehicle crossing permit, please visit Council's website for application forms.
- (b) Prior to any future dwellings being established the property owner may be required to install an onsite sewage disposal system. A discharge consent may be required from Environment Canterbury.
- (c) Requirements and conditions listed are a statement of the Council's minimum standards. Where the Consent Holder proposes higher standards or more acceptable alternatives these shall be submitted to the Council in writing for approval.
- (d) Development contributions apply to this subdivision. These will be levied in accordance with the Council's Development Contributions Policy. Development Contributions will be advised in a letter separate to the resource consent decision. Payment of development contributions is required prior to the completion of the 224(c) process, under section 208 of the Local Government Act 2002.
- (e) The Erosion & Sediment control Toolbox for Canterbury can be found on the Environment Canterbury website link <http://esc Canterbury.co.nz/>
- (f) The requirement for power and telephone to be confirmed as having capacity to service the subdivision does not guarantee that power or telephone connections are provided to potential allotments. On rural lots, the service authorities will not install submains to individual lots until the location of the house site is determined. Prospective purchasers of these lots should be advised to contact the relevant service authorities to ascertain the likely costs of servicing any specific lots to the purchaser's requirements.
- (g) The Consent Holder is advised that Traffic Management Plan forms can be sourced from Council Service Centres or on-line at: <https://www.waimakariri.govt.nz/home>
- (h) The Consent Holder is advised that vehicle access to any lot must comply with the requirements of the Waimakariri District Vehicle Crossings Bylaw 1997. Wherein no vehicle may be taken onto any property in the Waimakariri District other than by way of a properly formed vehicle crossing. The owner or occupier of any lot who may require vehicular access across any footpath, berm and water channel adjoining that lot is required to apply in writing to the Council to construct a vehicle crossing at the owner's or occupier's cost. No owner or occupier of any lot can build, or allow to be built, any dwelling, other significant building or any part of such a building on any property unless the

building site on that property is provided with adequate site access in terms of the above mentioned by law.

- (i) Standard NZS 3604 foundations are deemed suitable for the underlying geotechnical conditions provided that excavations are inspected and approved by a geotechnical engineer. This is in accordance with the completed Natural Hazards Report completed by Kirk Roberts for the subdivision and found on Council Records (reference Trim 210709112025).
- (j) If any of the following materials are encountered during any earthworks, such as:
- Stained or odorous soil (e.g. black, green, grey; or smells of rotting organic material, petroleum hydrocarbons or solvents)
  - Slag, ash, charcoal
  - Rubbish comprising putrescible waste, or hardfill
  - Potential asbestos containing-material (for example fragments from cement fibre sheets, or loose fibres from insulation, etc.)

Then the consent holder shall ensure that excavation and earthworks cease in the area of interest, the area secured to stop people entering where potential contamination was encountered, and then shall contact a contaminated land specialist for further advice.

### **REASONS FOR DECISION**

Pursuant to Section 113 of the Act the Council was satisfied that:

- No person is deemed to be adversely affected by the proposal.
- The environmental effects will be less than minor, for the following reasons:
  - Rural character and amenity will be maintained.
  - Safe access can be provided.
  - Flood hazard can be avoided or mitigated.
  - There are no on-site geotechnical constraints.
  - Water supply and sewer can be appropriately provided for.
- The proposal is in accordance with the operative and proposed District Plan's Objectives and Policies.

DATED at Rangiora this 15<sup>th</sup> Day of October 2021



SIGNED by Samantha Kealey  
**SENIOR PLANNER**

**Appendix D.**

**Legal Advice on Submission 10  
(Daniel Smith)**

16 April 2024

**To**

Matthew Bacon  
Development Planning Manager  
Waimakariri District Council

**From**

Jenna Silcock  
Francesca Dykes

**By Email**

matthew.bacon@wmk.govt.nz

Dear Matt

**Proposed Waimakariri District Plan Review – Submission #10 by Daniel Smith**

1. You have asked for advice in relation to the submission by Daniel Smith dated 8 October 2021 (**Submission**) on the Proposed Waimakariri District Plan (**Proposed Plan**).
2. In particular, you have sought advice about the following issues:
  - (a) whether the relief being sought by Mr Smith in the Stream 12 hearing is within scope of the Submission; and
  - (b) whether there is a question of fairness in terms of whether the outcome now sought in the Stream 12 hearing could have been identified from the original Submission and concept plan.
3. We address these questions together in our advice below.

**Executive summary**

4. As you appreciate the question of scope is a judgement exercise which requires regard to be had to all the relevant context, facts and circumstances. Scope, and associated procedural fairness considerations, are matters on which reasonable people can reach different conclusions. The question of whether relief is within scope is also not necessarily a yes / no answer. There may be aspects of the relief sought that are within scope and aspects that are outside scope.
5. In this context, we consider that the full extent of the proposal now being pursued by Mr Smith is not within the scope of the Submission. In particular, we consider that the areas where residential development is proposed and the level of residential development proposed for Area A is greater than what a reasonable person would have anticipated from reading the Submission.
6. While we consider a reasonable person would have anticipated that the Submission was seeking some increase in residential density as compared to the underlying zoning in the Proposed Plan, providing for residential activities in Area A (which was identified as being for "airside commercial / business / short term accommodation / air training and hangar space") and the removal of any minimum allotment size for Area A is likely beyond the scope of the Submission.

7. However, in our view, there is a development proposal for the relevant land that could be within the scope of the Submission, provided in particular that the development proposed for Area A is consistent with that shown on the plan annexed to Mr Smith's submission as discussed.
8. We note for completeness that we have assessed the question of scope on the basis of the information provided to us. Please let us know if we have not identified any material facts, or misunderstood any aspects of the Proposal, as that may alter our opinion.

### **Summary of relevant background**

9. By way of background, Mr Smith is the owner of the land adjacent to the Rangiora Airfield which is the subject of the Submission. The Waimakariri District Council (**Council**) is the owner of the Rangiora Airfield land.
10. Mr Smith made a submission on the Proposed Plan, seeking "to rezone the land at Rangiora Airfield from RLZ [Rural Lifestyle Zone] to SPArZ".<sup>1</sup>
11. We understand that SPArZ is referring to a 'Special Purpose Zone - Rangiora Airfield'.
12. There are a number of special purpose zones in the Proposed Plan, but none that are similar to that proposed in the Submission. The National Planning Standards provide that special purpose zones should only be used for specified purposes, or otherwise where certain criteria are met.<sup>2</sup>
13. The Submission included some further detail, by way of a concept plan with residential titles to the west of the Airfield and commercial / business / short-term accommodation / air training and hangar space titles to the east of the Airfield. However, the Submission did not propose any changes to objectives, policies or rules in the Plan. The Submission is discussed in more detail below.
14. There is now a question as to whether the relief now being pursued is within scope of this Submission.

### **Scope and natural justice / fair process considerations**

15. The Council (through the appointed Hearing Panel) is required to give a decision on the Proposed Plan and 'matters raised in submissions'.<sup>3</sup> This may include 'consequential alterations' or 'any other matter' arising from the submission.<sup>4</sup>
16. The relief pursued by a submitter, or supported by a decision-maker, does not need to be identical to that sought in submissions. Where there are differences between the relief sought in submissions and that pursued / supported, the key test is whether what is sought "is reasonably and fairly raised in submissions on the plan change".<sup>5</sup>
17. Scope is a matter of fact and degree, to be judged on the terms of the proposed change and the content of the submission(s).<sup>6</sup> It is a matter on which reasonable people may differ. Scope is not

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<sup>1</sup> Submission of Mr Smith dated 8 October 2021 at p 2.

<sup>2</sup> Ministry for the Environment. November 2019. National Planning Standards. Wellington: Ministry for the Environment, section 8.

<sup>3</sup> Resource Management Act, clause 10(1) of Schedule 1.

<sup>4</sup> Resource Management Act, clause 10(2)(b) of Schedule 1.

<sup>5</sup> *Countdown Properties (Northlands) Ltd v Dunedin City Council* (1994) 1B ELRNZ 150, [1994] NZRMA 145 at 166.

<sup>6</sup> *Countdown Properties (Northlands) Ltd v Dunedin City Council* (1994) 1B ELRNZ 150, [1994] NZRMA 145 at 166.



necessarily a yes / no answer. In other words, there may be aspects of relief that are being pursued by submitter that are outside scope and aspects that are within scope.

18. We have set out the law relating to scope in earlier advice for the Council and do not propose to repeat that here. Instead we summarise the key aspects of the law on scope as relevant to consideration of the Submission.
19. The question of scope "*raises two related issues: legality and fairness*".<sup>7</sup>
20. For an amendment to the Proposed Plan to be within the scope of a submission, it must be fairly and reasonably within the general scope of:<sup>8</sup>
  - (i) *the proposed plan as notified;*
  - (ii) *a submission, and the relief sought as summarised by the council provided this was fair and accurate and not misleading; or*
  - (iii) *something in between – including possibly new objectives, policies and rules.*
21. When considering what is reasonably and fairly raised in a submission, consideration should be given to "*the whole relief package detailed in the submission*".<sup>9</sup> It is a question of degree. It is sufficient if the changes can fairly be said to be "*foreseeable consequences*" of any changes directly proposed.<sup>10</sup> The assessment "*should be approached in a realistic workable fashion rather than from the perspective of legal nicety*".<sup>11</sup> Changes outside the proposed plan as notified and what is sought in a submission will be outside scope.
22. The courts have indicated that relevant factors to consider include:
  - (a) The matter of procedural fairness, and the importance of public participation in plan change processes – including with reference to the various stages in the Schedule 1 process that would put the public on notice of what was sought in the submission (and any subsequent amendment arising out of that submission).<sup>12</sup> In *General Distributors Limited v Waipa District Council*, Justice Wylie commented that the underlying purpose of the notification and submission process is to ensure that all are sufficiently informed about what is proposed otherwise "*the plan could end up in a form which could not reasonably have been anticipated resulting in potential unfairness*".<sup>13</sup> A precautionary approach to amendments is appropriate in this context.
  - (b) Whether interested persons would reasonably have appreciated that such an amendment could have resulted from the relief and decision sought by the submitter, and summarised by

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<sup>7</sup> *Albany North Landowners v Auckland Council* [2017] NZHC 138 at [101].

<sup>8</sup> *Countdown Properties (Northlands) Ltd v Dunedin City Council* (1994) 1B ELRNZ 150, [1994] NZRMA 145 at 166, *Christchurch International Airport Ltd v Christchurch City Council* ENC C77/99, 12 May 1999, at [15]; and upheld on appeal in *Healthlink South Ltd v Christchurch International Airport Ltd & Canterbury Regional Council* HC Christchurch AP14/99, 14 December 1999 at [15].

<sup>9</sup> *Albany North Landowners v Auckland Council* [2017] NZHC 138 at [115].

<sup>10</sup> *Albany North Landowners v Auckland Council* [2017] NZHC 138 at [115].

<sup>11</sup> *Albany North Landowners v Auckland Council* [2017] NZHC 138 at [115].

<sup>12</sup> See for example, *Christchurch International Airport Ltd v Christchurch City Council* ENC C77/99 12 May 1999, at [21] and *Gertrude's Saddlery Ltd v Arthurs Point Outstanding Natural Landscape Society Inc* [2021] NZHC 147 at [83], [112] - [115], [123].

<sup>13</sup> *General Distributors Ltd v Waipa District Council* (2008) 15 ELRNZ 59 at [58]-[60].

the council in the summary of submissions. This consideration is assessed on the basis of what a 'reasonable non-expert reader' would have been alerted to.<sup>14</sup>

23. Overall, the approach to the question of scope is a judgement call, to be addressed in a realistic and workable fashion and which is "*intended to enable public participation in the RMA process.*"<sup>15</sup> In particular, in the context of lay submitters, the High Court in *Countdown Properties (Northlands) Ltd v Dunedin City Council* acknowledged that submissions are "*often prepared by persons without professional help. We agree with the Tribunal that councils need scope to deal with the realities of the situation. To take a legalistic view that a council can only accept or reject the relief sought in any given submission is unreal.*"<sup>16</sup>

### **The Submission**

24. The Submission was brief (amounting to 6 pages) and was set out on the Council's standard form, with two attachments providing a map of the area and the proposed concept plan for the activities. It appears that the Submission was prepared by the Submitter himself, without professional assistance.
25. The Submission proposed that the "*District Plan allows for the airfield surrounding land boundaried by Priors Rd be rezoned to accommodate activity as identified on Daniel Smith drawing attachment SPARZ-002 dated 8 October 2021*".<sup>17</sup>
26. Attachment SPARZ-002 then showed the area between Priors Rd and Merton Road, surrounding the Airfield as including:
- (a) a number of residential titles to the west of the Airfield; and
  - (b) a number of commercial / business / short-term accommodation / air training and hangar space titles to the east of the Airfield.
27. The Submission did not include any objectives, policies or rules for the zone.

### Summary of Submissions for the Proposed Plan

28. The Summary of Submissions for the Proposed Plan summarises the Submission as follows:<sup>18</sup>
- "Establish a Special Purpose Airport Zone at Rangiora Airfield and surrounding land bounded by Priors Road and Merton Road to accommodate residential and commercial activities shown in attachments SPARZ - 001 and - 002."*
- And
- "Rezone land at Rangiora Airfield from Rural Lifestyle Zone to Special Purpose Airport Zone."*

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<sup>14</sup> *Christchurch International Airport Ltd v Christchurch City Council*, ENC C77/99 12 May 1999 at [21] – [22]. See also *Albany North Landowners v Auckland Council* [2017] NZHC 138 at [176] and *Gertrude's Saddlery Ltd v Arthurs Point Outstanding Natural Landscape Society Inc* [2021] NZHC 147 at [78].

<sup>15</sup> *Gertrude's Saddlery Limited v Queenstown Lakes District Council* [2020] NZHC 3387 at [63].

<sup>16</sup> *Countdown Properties (Northlands) Ltd v Dunedin City Council* (1994) 1B ELRNZ 150, [1994] NZRMA 145 at 165, confirmed in *Albany North Landowners v Auckland Council* [2017] NZHC 138 at [107].

<sup>17</sup> Submission of Mr Smith dated 8 October 2021 at p 2.

<sup>18</sup> Summary of Submissions on the Proposed Plan at p 3.

29. We understand there were no further submissions made in relation to the Submission.

**Relief now proposed in Stream 12 hearing**

30. Mr Smith has now provided, via the evidence of Dean Chrystal, full details of the proposal, including proposed plan provisions provided as Appendix 1 to the evidence of Dean Chrystal (the **Proposal**).

31. The Proposal includes:

- (a) permitted activity standards for "Airfield Activities" in Area A (see SPZ(RA)-R2);<sup>19</sup>
- (b) permitted activity standards for residential activities in Area A (up to 30 residential units, provided they are associated with Airfield Activities) and Area B, in both cases outside the 65 dBA LdN noise contour (see SPZ(RA)-R4);
- (c) permitted activity standards for visitor accommodation in Area A, where associated with an airfield activity, and in Area B, within a residential unit for a maximum of 8 visitors per site, in both cases outside the 65 dBA LdN noise contour (see SPZ(RA)-R3);
- (d) restricted discretionary status for subdivision, subject to the subdivision standards, which includes no minimum allotment area for Area A and a minimum allotment area of 5000m<sup>2</sup> in Area B (see SUB-R12 and Table SUB-1);
- (e) amendments to the subdivision provisions to require no complaint covenants in favour of the Council for all noise sensitive activities within the Special Purpose Zone (Rangiora Airfield);
- (f) amendments to the subdivision provisions to require that each subdivision to be subject to an enforceable legal agreement guaranteeing access to the Rangiora Airfield via planned taxiways (see SUB-S5); and
- (g) amendments to the noise provisions, including R-15, which enables noise sensitive activities and residential activities within the 55 dBA LdN contour, provided they are insulated to achieve the noise control levels in Table Noise-1.

32. The Outline Development Plan included in Appendix A generally aligns with Attachment SPArZ-002 to the Submission. The evidence of Dean Chrystal clarifies that the final proposal excludes the area to the east of Merton Road, slightly reducing the overall area of the proposal.<sup>20</sup>

33. We note there is the potential for some argument about the extent of the area covered by the Submission noting there appears to be some discrepancy between the area highlighted in SPArZ-001 and that identified in SPArZ-002. In our view SPArZ-001 would provide scope for the full area, even if that is not necessarily clear on SPArZ-002. We are left with some uncertainty as to whether Areas A and B as identified in the Submission are reflected in Areas A and B in the proposed Outline Development Plan. This is important because it determines what activities are proposed to occur.

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<sup>19</sup> A definition for "Airfield activities" is proposed to be inserted. Note the construction of and alterations to all buildings are proposed to be subject to built form standards under SPZ(RA)-R1. This includes height limits, set back requirements and, for buildings in Area B, a maximum site coverage of 20%.

<sup>20</sup> Evidence of Dean Chrystal dated 13 March 2024 at [24].

34. The provisions proposed by Mr Smith also address enabling and protecting the airfield. While we understand why these provisions are being proposed, the Submission addresses "*the airfield surrounding land being rezoned to accommodate activity identified*" rather than the enabling and/or protecting the airfield.
35. We note that the issue of scope was covered in legal advice from Mr Andrew Schulte. Mr Schulte appropriately recognises that scope involves the exercise of judgement and reasonable people can reach different conclusions. The advice also addresses arguments for and against aspects of the development proposal being within or outside scope. Mr Schulte concludes that:
1. *Therefore, and acknowledging the need to exercise a judgement in such matters where the outcome is unclear, it is my opinion that the submission on the SPArZ is sufficiently clear to have put the public generally on notice that a rezoning adjacent to the Airfield was being promoted. In some ways the absence of detail might have given anyone concerned by such an outcome an additional reason to indicate their opposition to the submission.*
  2. *However, because this conclusion does require a judgement call, it needs to be recognised that another person (in particular a decision maker) could reach a different conclusion. The impact of that is discussed in the next section.*

#### **Relevant Proposed Plan Rules**

36. It is also important to consider the context in which the Submission was made. In terms of what would otherwise be permitted under the Proposed Plan, the Rangiora Airfield and adjacent land is proposed to be zoned Rural Lifestyle. The Proposed Plan as notified provided that:
- (a) residential units are permitted in the Rural Lifestyle Zone subject to permitted activity standards, including that there is a minimum site area of 4ha (see RLZ-R3);
  - (b) visitor accommodation is a permitted activity within a residential unit for a maximum of 8 visitors per site;
  - (c) residential units and other noise sensitive activities are prohibited in the 65 dBA Ldn noise contour (see Noise-R23);
  - (d) residential units and other noise sensitive activities are permitted in the 55 dBA Ldn noise contour, provided they are insulated to achieve the noise control levels in Table Noise-1 (see Noise-R15); and
  - (e) subdivision is a controlled activity, subject to subdivision standards (see SUB-R2), which includes a minimum allotment size of 4ha (see SUB-S1 and Table SUB-1).
37. The Proposed Plan does provide for the Rangiora Airfield in various chapters.

**Analysis**

38. Although the Submission was brief, it identified:
- (a) the location of the proposed change;<sup>21</sup>
  - (b) the activities it sought to be permitted; and
  - (c) the mechanism by which it sought this to be achieved ie rezoning of the area as a Special Purpose zone.
39. However, it was not clear on the face of the Submission that it would result in:
- (a) the requirement for no complaint covenants for all noise sensitive activities;
  - (b) the requirement for all subdivisions to be subject to an enforceable legal agreement guaranteeing access to the Rangiora Airfield via planned taxiways;
  - (c) residential development in Area A or the removal of minimum lot sizes in Area A, and reducing the minimum lot size for Area B, which is proposed to be subject to a 5000m<sup>2</sup> minimum allotment size requirement. In terms of Area B, SPArZ-0002 identifies lots and lot sizes which are different from that now proposed; and
  - (d) enabling provisions for the airfield and/or associated reverse sensitivity provisions.
40. Putting those matters to one side for now, generally, a non-expert reader is unlikely to have contemplated the specific provisions required to give effect to the Submission. Therefore, there is a risk that potential submitters did not understand the consequences, including the potential for higher density, and accordingly did not further submit in response. The provisions now proposed to support the Submission are quite extensive and present a stark contrast to the Submission. The relief now being pursued also extends to other chapters in the plan including the noise chapter. There is an argument that such changes are consequential to the rezoning request. However, the reach of the provisions is a relevant consideration.
41. The introduction of specific planning rules, policies and objectives could be seen as a foreseeable consequence of a proposal to rezone a certain area and provide for residential and commercial / business activities. Although proposed rules, policies and objectives could have been included and there is an argument that "*specific provisions of the proposal*" are required by Form 5<sup>22</sup>, it is not necessarily realistic for a non-expert submitter to include a complete or even partial set of proposed plan rules, policies and objectives. As noted above, it is common for submitters to make submission without professional assistance, and this is an important part of encouraging public participation in RMA processes.
42. We have therefore, reached the conclusion that in this context the failure of the submission to specify proposed rules, policies and objectives is unlikely to, in and of itself, mean that the relief now being pursued is out of scope. As signalled above, we do however consider there are aspects

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<sup>21</sup> We note that there may be some argument about this given the discrepancies between the maps / plans attached to the Submission.

<sup>22</sup> Of the Resource Management (Forms, Fees and Procedure) Regulations 2003.

of the specific relief now being pursued that goes beyond that which is fairly and reasonably raised in the Submission. In particular:

- (a) the proposal for residential development and no minimum lot sizes in Area A and an apparent reduction in the lot sizes for Area B. While it could be reasonably inferred from the Submission that the submitter was seeking residential development and that development might differ from the underlying zoning, there was no indication that Area A would include residential development or that the minimum allotment requirements would be removed for Area A entirely or reduced in Area B below the lot sizes shown on SPArZ. *Attachments SPArZ – 001 and – 002*. In our view, the Submissions' attachments illustrate what the Submission was seeking in terms of the level of anticipated development. Removing the minimum lot size for Area A or reducing it for Area B enables higher development potential than that shown on *Attachments SPArZ - 001 and – 002*. The level of density now proposed could be regarded as coming out of "left field"<sup>23</sup> having regard to the Plan that was included with the Submission and what the Proposed Plan provided for; and
  - (b) the provisions relating to enabling and/or protecting the airfield.
43. In our view, the requirements proposed for no complaints covenants and legal agreements regarding taxiway access may not be as problematic because they are matters that primarily concern any future land owner(s) and the Airfield. These details are less likely to attract concerns from adjoining landowners or members of the public.
44. In terms of the question of procedural fairness, the relief being pursued has the potential to impact on adjoining landowners and beyond. It is important to note that the Submission was made as part of a full-scale plan review rather than a more limited plan change. There is a distinction drawn in the case law on scope between variations or discrete plan changes and full District Plan reviews, with scope for changes to what is proposed generally being more limited in the latter circumstances.
45. The Submission was, in our assessment, accurately summarised in the Summary of Submission. A non-expert reader would have been put on notice to the intention to rezone the Rangiora Airfield Area to provide for residential and commercial activities. It is arguable that anyone interested in that rezoning was effectively "put on notice" and had the opportunity to make a further submission. The Submissions did not propose any controls on the development sought to be enabled in the special purpose zone. People who had an interest or concerns about the development could have joined the proceeding to ensure they could have a say in how that development could proceed. So while the provisions now being proposed by the Submitter could be seen as extensive, in some respects they control development that the submission sought to be provided for.
46. We acknowledge that it perhaps surprising that there are no further submissions on this rezoning request. In particular from the Council, as the owner of the Airfield land. We also understand that there is a Rangiora Airfield Advisory Group which could reasonably be expected to have an interest in development which might impact on the Airfield.

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<sup>23</sup> *Clearwater Resort Ltd v Christchurch City Council* HC Christchurch AP34/02, 14 March 2003 at [69].

47. In the event the Panel considers there is scope to grant the relief being sought (either in full or part), the absence of involvement and/or evidence from or addressing the impacts of the proposal on the owner, operator and/or users of the Airfield and adjoining landowners may be relevant to its consideration and assessment of the Submission and relief sought.
48. In summary, we consider that there are aspects of the relief now being pursued, as articulated in Mr Chyrstal's evidence, that could be considered to be reasonably and fairly within the scope of the Submission. However, there are other aspects of the relief that go beyond what was fairly and reasonably raised in the submission, including allowing residential development in Area A, removing the minimum allotment size for Area A and changing the minimum allotment size for Area B and the provisions enabling and/or protecting the airfield.
49. The question of whether there is scope for the relief being pursued is particularly complex. Given the broad nature of the Submission and the extent of what is now proposed, it is nuanced, with no yes / no answer. We have formed a view that there are some aspects of what is being proposed which are fairly and reasonably within scope - acknowledging, that there are counter-arguments available and a decision-maker might reach a different conclusion. There are also matters which we consider go beyond what could be seen to be fairly and reasonable raised by the Submission. There are a number of matters which require a reasonable level of thought into what the Submission was seeking and whether that is consistent with what is now being pursued by the submitter. However, overall, we consider the Submission provides scope for some form of development proposal; the issue is around the extent of that and what that looks like in the Proposed Plan. That will require careful consideration. For current purposes, our opinion does not consider the scope of each provisions the submitter is now pursuing but we are happy to assist with that exercise at the appropriate time. The merits of a proposal within scope will then need to be considered.

**Concluding comments**

50. We trust the above is of assistance. However, please do not hesitate to contact us if you have any further questions or would like us to elaborate on any matters addressed in our advice.

Kind regards



**Francesca Dykes / Jenna Silcock**  
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**Appendix E.**

**Expert Evidence of Mark  
Gregory**



**Before the Hearings Panel  
At Waimakariri District Council**

**Under** Schedule 1 of the Resource Management Act 1991

**In the matter of** the Proposed Waimakariri District Plan

**Between** **Stream 12B submitter requesting Special Purpose Zone  
(SPZ) Rangiora Airfield**

**And** **Waimakariri District Council**

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**Statement of evidence of Mark Gregory on behalf of Waimakariri District  
Council, Transportation Planning**

**Date: 14<sup>th</sup> May 2024**

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## **INTRODUCTION:**

1 My full name is Mark Andrew Gregory. I am employed as a Principal Transport Planner at WSP New Zealand.

2 I have prepared this statement of evidence on behalf of the Waimakariri District Council (**District Council**) in respect of technical related matters arising from the submissions on the Proposed Waimakariri District Plan (**PDP**).

3 I am authorised to provide this evidence on behalf of the District Council.

## **QUALIFICATIONS AND EXPERIENCE**

4 My qualifications and experience are as set out in previous evidence for streams 12c and 12e.

5 I have had assistance from the following people in forming my view while preparing this evidence:

5.1 Shane Binder, WDC Senior Traffic Engineer, who has provided advice relating to WDC transportation projects, and the Long-Term Plan (LTP).

5.2 Bryce Powell, WDC Senior Planner, who has provided planning advice which may have implications on transportation outcomes.

## **CODE OF CONDUCT**

6 I have read the Code of Conduct for Expert Witnesses set out in the Environment Court's Practice Note 2023. I have complied with the Code of Conduct in preparing my evidence and will continue to comply with it while giving oral evidence before the Environment Court. My qualifications as an expert are set out above. Except where I state I rely

on the evidence of another person, I confirm that the issues addressed in this statement of evidence are within my area of expertise, and I have not omitted to consider material facts known to me that might alter or detract from my expressed opinions.

## **SUMMARY**

7 My statement of evidence addresses the submission to rezone land east of the existing designation, to accommodate runway expansion, and make provision for an 'airfield business park style of development'. An Outline Development Plan (ODP) is included.

8 I also note the Resource Consent which has established twenty lots of four hectares, including specific conditions relating to road upgrades.

9 In summary, my assessment considers that:

9.1 There are many different activities and outcomes which could be anticipated through the rezoning. These outcomes could result in varying transportation environmental effects. I do not consider enough information has been supplied by the submitter which covers these potential activities.

9.2 Given that there are varying possible transportation effects, the avoidance or mitigation of these would likely be controlled via transportation upgrades at specified thresholds. There is little information in the submission or supporting evidence to direct this management, including identifying the infrastructure standards required, the definition of thresholds, (criteria, horizon period), or the instruments within which to apply them.

9.3 There are potential activities which could establish which would not be anticipated through the rezoning, including activities not associated with the airfield. These could also

result in transportation effects extra to those anticipated. It is not clear at this stage as to how these could be controlled through the district plan.

9.4 I consider the ODP does offer some positive aspects, such as realignment of Priors Road, but I am unclear as to the standard to which the internal roads will be developed, or though what processes this would be controlled.

9.5 In my opinion there is insufficient information currently available in order to confidently understand the potential range of transportation effects, and how such effects could be mitigated, and the instruments (and trigger points) through which effects can be managed and mitigation implemented.

#### **INVOLVEMENT WITH THE PROPOSED PLAN**

10 I have been involved in the PDP since December 2023.

#### **SCOPE OF EVIDENCE**

11 My statement of evidence addresses potential transportation effects.

12 My assessment considers:

12.1 Potential transportation effects which could arise from changing the zoning from a rural lifestyle zone to Special Purpose Zone – Rangiora Airfield.

12.2 The ability of the Plan to manage potential effects if the rezoning request was granted.

13 The scope of my evidence does not extend to policy alignment matters.

## ASSESSMENT

14 My assessment refers to information provided by:

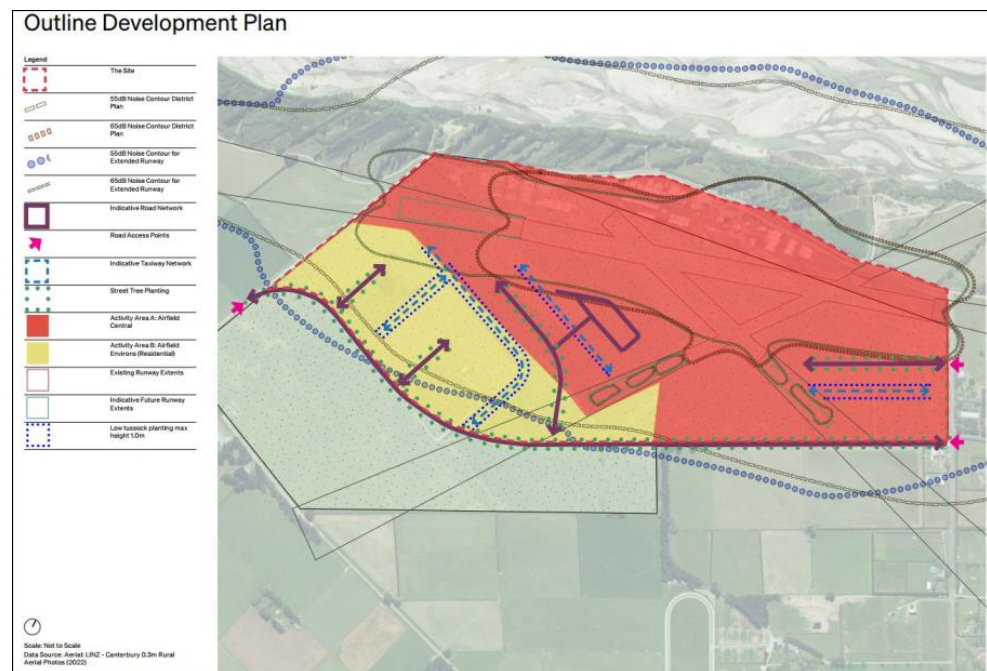
14.1 Evidence of Dean Michael Chrystal, Planning

14.2 Evidence of Andrew Metherell, Transportation

14.3 Evidence of Steve Noad, Airfield Operations.

15 The proposal includes an Outline Development Plan (ODP), which broadly defines the site into 'Area A' and 'Area B' as shown in Figure 1.

Figure 1: Proposed ODP, Evidence of Mr Chrystal, Appendices, (p38)



16 The ODP shows positive transportation outcomes such as realignment of Priors Road on the southern boundary. However, there is no clarity on the standard of the internal roads, or the process via which this would be managed. This could take the form of subdivision consent, for example.

- 17 There are a number of possible outcomes which could result from the requested rezoning, with different activities each having different effects on the transportation network and therefore requiring differing approaches to the avoidance or mitigation of these effects. These outcomes are related to:
- 17.1 The ongoing operational arrangements of the airfield, including the possibility that alternative locations such as Christchurch International Airport (CIA) discontinues ultra-light aircraft operations<sup>1</sup>, deferring traffic and business to Rangiora. The airfield is currently non-certified, and is restricted to daylight operations.
  - 17.2 The range of possible activities which could establish, noting that “Airfield purposes” are not identified in the operative District Plan. Business Park is mentioned<sup>2</sup>. These could be activities of low transport intensity, such as warehousing / storage, or of higher intensity such as construction depots or manufacturing.
  - 17.3 There is also possibility of a mix of activities which are ancillary to the airfield, or capable of generating primary trips in their own right. This could include commercial activities to support airfield visitors, which may also attract trips from further afield.
- 18 There is also a risk to transportation effects, relating to the existing condition and circumstances of the receiving transport network.

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<sup>1</sup> Evidence of Mr Noad, paragraph 22

<sup>2</sup> Evidence of Mr Chrystal, paragraph 2

- 18.1 Priors Road, serving access to Block B (see Figure 1) is currently an unsealed, narrow road.<sup>3</sup> Reported existing traffic volumes<sup>4</sup> are 58 vehicles per day, of which approximately 30% is estimated to be associated with the airfield.
- 18.2 Merton Road includes inconsistent edge line delineation,<sup>5</sup> and a length of 350 m (between Priors Road and Airfield Road) which does not meet the road width standards<sup>6</sup> identified in the operative District Plan. It also lacks a centre line. Reported existing traffic volumes<sup>7</sup> are 340 vehicles per day (vpd), of which approximately 100% is estimated to be associated with the airfield.
- 18.3 A safety analysis and crash history outlined by Mr Metherell, found:
- 18.3.1 A trend of individual run off road crashes, likely exacerbated by speed.
- 18.3.2 Run off road hazards, which likely contributed to injurious outcomes, and some of which have subsequently been removed.<sup>8</sup>
- 18.3.3 Five crashes in a ten-year period at the Oxford / Merton intersection, including one fatal outcome. These were the result of 'failure to give way' at a high-speed Stop controlled intersection.

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<sup>3</sup> Evidence of Mr Metherell, Appendix A, p13

<sup>4</sup> Evidence of Mr Metherell, Appendix A, p41

<sup>5</sup> Evidence of Mr Metherell, Appendix A, p14

<sup>6</sup> WDC Proposed District Plan, Part 8 Roading (Table 8.3)

<sup>7</sup> Evidence of Mr Metherell, Appendix A, p41

<sup>8</sup> Evidence of Mr Metherell, Appendix A, p14 (crash ID 2021190845)

18.3.4 The unsealed section of Merton Road is identified as having a medium-high infrastructure risk rating, the 'worst' rating on the receiving network<sup>9</sup>

- 19 In my opinion, the low scale of traffic volumes indicated in Mr Metherell's volume data (above in 18.1 and 18.2) would not usually indicate safety or efficiency issues. The condition of the network, particularly Priors Road (being unsealed) would likely be a driver for improvements in the existing environment.
- 20 Potential improvements identified via the ODP and included in the Resource Consent<sup>10</sup> both identify measures which could improve Priors Road through sealing, widening and realignment.
- 21 Mr Metherell suggests that improvements to Merton Road (identified in paragraph 18.2) would be required at threshold of 750 vpd,<sup>11</sup> based on the NZTA 'RTS 5: Guidelines for rural marking and delineation'. Mr Metherell further states (Appendix A, p23) that the 'volume would be reached even without rezoning in the future'. However, Figure 8-3 and Table 8-1 in his evidence speak to a future value of 532 vpd.
- 22 In my opinion, there is limited evidence to suggest existing transportation effects caused by existing activities. This is due to the reported scale of vehicle demands being suitably low to not trigger thresholds for improvement.
- 23 Mr Metherell's evidence sets out a potential assessment of environmental effects on the receiving environment. At this stage, it is based on 1.7 vpd per 100 m<sup>2</sup> of airfield building and 5.7 vpd per building (of typically 325 m<sup>2</sup>), resulting in an estimated 688 vehicles per

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<sup>9</sup> Evidence of Mr Metherell, Appendix A, p13, sourced from NZTA Waka Kotahi Megamaps

<sup>10</sup> Evidence of Mr Metherell, Appendix A, p15

<sup>11</sup> Evidence of Mr Metherell, Appendix A, p23



day (vpd). The vehicle generation assumptions are applied to the network, and potential effects on capacity are estimated. Outcomes are subsequently sensitivity tested by increasing demands by a factor of 25%.

24 In my opinion the trip generation estimates are over simplified, based on the range and scale of activities which could occur. My opinion also considers the use of sensitivity testing: it is possible that alternative activities could generate network demands in excess of 25% of the assumed vehicle generation.

25 Therefore, in my opinion the conclusions into potential transportation effects hold limited value at this stage.

26 I have also considered:

26.1 The distance of the site is 5 km from Rangiora town centre, which would increase distances travelled by future residents and reduce travel mode choice (walking and cycling).

26.2 The proposal includes the concept of 'live – work' - whereby those employed by airfield related activities (e.g. mechanics) would have opportunities to live on site.

27 Therefore, although Mr Metherell analyses potential transportation efficiency of some activities associated with the proposed rezoning on to the receiving environment, in my opinion the range of activities explored are too narrow for me to confidently agree.

28 Mr Metherell does suggest triggers which could be applied during consenting to address specific infrastructure needs. However, I cannot support these until I see the specific assessment matters available, and how they relate to specific improvement (e.g. sealing of the unsealed road).

## CONCLUSION

29 There is a range of activities and staging possibilities which could materialise if the rezoning request was granted.

30 I recommend clarification is sought from the submitter (and its experts) on:

30.1 The range of possible activities which can establish.

30.2 The consideration of a wider possibility of environmental outcomes than the ones currently offered.

30.3 The consideration of a range of mitigation options, either associated with different activities or staging. This may include additional measures to those currently mentioned.

30.4 The identification of 'triggers' and implementation methods, for securing future network upgrades as demand (and therefore potential effects) for access to activities increases.

30.5 Specific methods of control, such as activity classes, of possible activities or drivers of development (such as runway extension).

31 In my opinion, the question of certification of the airfield seems to hold potential significance. Presumably, certification could result in enhanced services and infrastructure which could increase operating capacity and therefore generate more movement demands. The potential for discontinuation of similar services at Christchurch International Airport (CIA)<sup>12</sup> could be consequential.

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<sup>12</sup> Evidence of Mr Noad, paragraph 22

32 Furthermore, the consequence of extending the runway needs to be considered further, in terms of the additional identity and scale of activities it could support.

**Date:** 14/05/2024

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

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## **Appendix F.**

## **Expert Evidence of Mark Lewthwaite**

**Before the Hearings Panel  
At Waimakariri District Council**

**Under** Schedule 1 of the Resource Management Act 1991

**In the matter of** the Proposed Waimakariri District Plan – Stream 12:  
Rezoning of land

**Between** **Various submitters**

**And** **Waimakariri District Council**

**Respondent**

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**Statement of evidence of Mark Lewthwaite on behalf of Waimakariri District  
Council (Acoustics)**

**Date: 28 May 2024**

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## **INTRODUCTION**

- 1 My full name is Mark Douglas Lewthwaite. I am a Technical Director and Associate at Powell Fenwick where I have been employed for eighteen years practicing in the fields of mechanical services and acoustics. I lead our acoustic team.
- 2 I have prepared this statement of evidence on behalf of the Waimakariri District Council (District Council) in respect of technical related matters arising from the submissions and further submissions on the Proposed Waimakariri District Plan (PDP).
- 3 Specifically, this statement of evidence is an acoustic peer review of a statement of evidence by Mr Rob Hay. My Hay's evidence accompanied an application by Daniel Smith to rezone Rangiora Airfield and surrounding land.
- 4 I am authorised to provide this evidence on behalf of the District Council.
- 5 The scope of this statement of evidence does not extend to review of the revised airfield noise contours.

## **QUALIFICATIONS AND EXPERIENCE**

- 6 I hold the qualifications of Honours Degree in Mechanical Engineering obtained from the University of Canterbury.
- 7 My acoustic work has breadth across building and environmental fields. This includes numerous assessments of the effects of aircraft noise, and I am familiar with NZS 6805:1992 Airport noise management and land use planning, and the implementation of District Plan rules for mitigation of airport noise.

- 8 Relevantly, I provided acoustic peer review of the Rangiora Airfield Proposed Plan Change in 2020 – with accompanying noise assessment by Mr Rob Hay, which introduced aircraft noise contours.
- 9 I am a Chartered Professional Member of Engineering New Zealand (CMEngNZ), and an Affiliate Member of the Acoustical Society of New Zealand.

#### **CODE OF CONDUCT**

- 10 Although this is not an Environment Court hearing, I have read the Code of Conduct for Expert Witnesses set out in the Environment Court's Practice Note 2023. I have complied with the Code of Conduct in preparing my evidence and will continue to comply with it while giving oral evidence before the Environment Court. My qualifications as an expert are set out above. Except where I state I rely on the evidence of another person, I confirm that the issues addressed in this statement of evidence are within my area of expertise, and I have not omitted to consider material facts known to me that might alter or detract from my expressed opinions.
- 11 Mr Aaron Healy in the Powell Fenwick acoustic team was also involved in the preparation of this evidence. Mr Healy has a Masters of Engineering in acoustics study and a Bachelors of Mechanical Engineering with Honours from the University of Canterbury. He is a member of the Acoustical Society of New Zealand. Aaron's experience is primarily in environmental acoustics, including involvement in aircraft land use planning and nationwide research on the community response to transport noise.

#### **INVOLVEMENT WITH THE PROPOSED PLAN**

- 12 I have not had any involvement with the Proposed District Plan process.

## SUMMARY

- 13 This statement of evidence is an acoustic peer review of a statement of evidence by Mr Rob Hay which accompanied an application by Daniel Smith to rezone Rangiora Airfield and surrounding land.
- 14 I am in general agreement with Mr Hay's comments on the typical undesirability of activities sensitive to aircraft noise (ASANs) within the 55 dB  $L_{dn}$  air noise contour and the requirement to ensure any ASANs within the designation are sufficiently tied to airport activities.
- 15 I agree that requiring noise insulation described in Table NOISE-1 of the Proposed District Plan is a suitable way to manage internal noise levels. However, in my opinion the internal noise level requirement for "other habitable rooms" could be decreased from 50  $L_{dn}$  to 40  $L_{dn}$  – this is a general District wide comment.
- 16 The proposed designation will allow for activities linked with the airfield to occur as a permitted activity across proposed Activity Area A. This could be a wide range of activities and including residential or accommodation. The potential effects from louder or closer activities on existing rural dwellings within neighbouring land and dwellings/accommodation within the proposed Areas A and B have not been assessed in the application. Further, taxiing will take place amidst proposed residential Area B.
- 17 Additional information and noise assessment is requested from the applicant to demonstrate the acceptability of noise effects from the following activities:
- 17.1 Taxiing within Activity Area B
  - 17.2 Engine testing
  - 17.3 Industrial or louder commercial activities



## **SCOPE OF EVIDENCE**

- 18 My statement of evidence addresses the following matters:
- 18.1 Peer review on behalf of Waimakariri District Council of the statement of evidence by Mr Rob Hay regarding acoustic matters relating to the submission.
  - 18.2 Identification of any acoustic matters not included within the supporting acoustic evidence
- 19 I have read and reviewed the following documents:
- 19.1 Proposed Waimakariri District Plan Submission – Mr Daniel Smith, dated 08 Oct 2021.
  - 19.2 Statement of Evidence of Mr Rob Hay related to noise.
  - 19.3 Parts of the planning Statement of Evidence of Mr Dean Chrystal, dated 13 Mar 2024.
- 20 I consider the matters relevant to acoustics to be:
- 20.1 Appropriateness of Activities Sensitive to Aircraft Noise (ASANs) within the Designation.
  - 20.2 Suitability of sound insulation measures.
  - 20.3 Effects from on ground activities within the designation.

## **REVIEW**

### **NOISE SENSITIVE LAND USES NEAR AIRPORTS**

- 21 Mr Hay proposes that airport land use zoning and setbacks is used to separate ASANs from exposure to aircraft noise. This is consistent with

NZS 6805:1992 Airport Noise Management and Land Use Planning, which is the accepted best practice for management of aircraft noise, evidenced by it being included as a compulsory standard within the National Planning Standards.

- 22 NZS 6805:1992 recommends that ASANs should be prohibited within the 65 dB  $L_{dn}$  air noise contour, and that ASANs should be prohibited within the dB 55  $L_{dn}$  air noise contour, unless permitted by a district plan and subject to appropriate acoustic insulation to ensure a satisfactory internal noise environment. The application is consistent with NZS 6805 on this matter.
- 23 I agree with Mr Hay that noise results in a mixed community response and that a moderate percentage will be annoyed at levels above 55  $L_{dn}$ . While large uncertainties are involved, across large communities exposed to commercial aviation noise approximately 25% would report being highly annoyed at 55 dB  $L_{dn}$ , and approximately 50% would report being highly annoyed at 65 dB  $L_{dn}$ . (WHO Environmental Noise Guidelines for the European Region 2018.)
- 24 Environmental noise levels in outdoor areas during the day time are most commonly compared to a limit of 55 dB  $L_{Aeq}$  for onset of serious annoyance (WHO Guidelines for Community Noise 1999). In outdoor areas noise cannot be mitigated at receiving sites, this reinforces that noise levels of 55-65 dB  $L_{dn}$  (which might equate to 57-67 dB  $L_{Aeq}$  during the day time in this case) would cause serious annoyance to a notable proportion of a generic community.
- 25 Opinion of the noise generating activity, such as in this case the airfield, is influential in the reported annoyance. Prior research showed that annoyance is increased when the respondents also report; a fear of the noise source, a belief the noise could be prevented, annoyance with non-noise related aspects of the activity, general noise sensitivity, and/or a belief the noise is not important. (Effect of Personal and Situational Variables on Noise Annoyance in Residential Areas, 1993.)

Therefore, people who are linked with the airfield are more likely to both be informed in their decision to live near the airfield, and be less annoyed by noise from aircraft flight operations than the average person. This may partially extend to tolerance of on ground operations related to the airfield.

26 I also share Mr Hay's concern regarding the risk of change in ownership over time resulting in ASANs less closely-tied to the airfield which would exhibit annoyance more typical of the average population and present an increased risk of reverse sensitivity effects. Mr Hay presents ideas on planning/legal mechanisms to mitigate this risk, I will leave comment on the effectiveness of these measures to others. However I would add that the measures do not clearly address a dwelling (or potential accommodation) being let to uninformed occupants with no relationship with the Airfield, who would, for example, have no likelihood of seeing a no-complaints clause in a Land Information Memorandum.

27 There is also risk that the noise levels may increase observably as flights increase over time, or increased runway length allows different noisier aircraft, or where actual flight paths include more overhead movements related to training flights. Mechanisms should address these possibilities.

#### SOUND INSULATION

28 Effects of aircraft noise on ASANs are proposed to be mitigated through the requirement for building insulation to achieve indoor sound levels in PDP Table NOISE-1. This approach is consistent with recommendations in NZS 6805:1992.

29 Night-time flight noise is penalised by 10 dB when determining noise exposure using dB  $L_{dn}$  (day-night). The airport does not operate enough night-time flights annually to meaningfully contribute to the noise contours. Therefore,  $L_{dn}$  levels presented in the contours are closely

aligned with 24 hour  $L_{Aeq}$  (average) levels. Due to the airport operations being limited to daylight hours the average level during daytime operations would be approximately 2 dB higher than the day-night level.

- 30 The internal noise level allowed by these rules in “other habitable rooms” of residential buildings (the most commonly used of which would be the living room) is 50 dB  $L_{dn}$  which would in this situation equate to 52 dB  $L_{Aeq}$  over a summer daylight period of say 14 hours. This is a level akin to a background noise in an active office and in my opinion higher than ideal in a typical environment.
- 31 Road and rail noise are required to meet 40 dB  $L_{Aeq}$  inside habitable rooms during the day in the PDP rule NOISE-R16. Adopting a 40 dB  $L_{dn}$  internal design requirement for other habitable spaces for airfield noise would therefore be more consistent with the treatment of other transport noise. (The 10 dB overnight penalty included in the  $L_{dn}$  metric will not have an additional effect under the operation of the current noise contours due to the insignificant number of annual flights in the night-time period.)
- 32 Equivalent airport noise rules in other District Plans vary with regards to limits for living spaces. There is consistency with the Christchurch District Plan which is 50 dB  $L_{dn}$  for Christchurch International Airport (the noise contours for which extend into Waimakariri District), however Queenstown and Auckland Airports instead use 40 dB  $L_{dn}$ .
- 33 The operational link between these ASANs and the Rangiora Airfield could make occupants of these ASANs more tolerant to aircraft noise. These comments should therefore be read as most applicable to other ASANs in the District, and a matter better addressed under the Noise Chapter.
- 34 A 15 dB reduction in noise level as required where there is a 55 dB  $L_{dn}$  exposure to meet 40 dB  $L_{dn}$  internal noise level, will be achieved by a

standard construction with windows ajar. 25 dB reduction which would be required by properties on the edge of the 65 dB  $L_{dn}$  contour can be achieved by many modern constructions with practicable enhancements.

- 35 PDP Table NOISE-1 includes a LAE internal design level requirement, which is a measure of total noise energy associated with a single aircraft movement described by the sound level experienced over one second. Following the method in PDP Rule NOISE-R14 1.b for Christchurch International Airport this would be calculated from the airport noise contours. Given an LAE contour is not presented for Rangiora Airfield, nor a reference aircraft stated it is not practical to assess an internal noise level based off the LAE. PDP rule NOISE-R15 could be modified to specify only the dB  $L_{dn}$  internal sound levels in PDP Table NOISE-1.

#### PROPOSED NOISE CONTOURS

- 36 Modified noise contours are included overlaid on the ODP. These extend the 55 dB and 65 dB  $L_{dn}$  contours further to the west. Mr Hay reported that his colleague modelled the proposed contours, and they reflect an increase in runway length and subsequent movement on the runway threshold.
- 37 With no access to further information the contours visually appear to reflect the same operations as the existing contours, with a modified threshold at the west.
- 38 To my knowledge the existing noise contours are based on a future case with a number of aircraft movements above the threshold which would trigger the requirement of noise measurements. So long as the nature of the aircraft remain the same, this will appropriately manage the risk of an increase in activity resulting in increased noise generation by aircraft flight operations.

## TAXIING

- 39 Dwellings within Activity Area B are anticipated to have aircraft hangars and access to taxiways. No evidence has been presented with the submission regarding the noise effects of taxiing aircraft. An assessment of noise from taxiing should accompany the application to provide confidence that taxiing operations will not result in unreasonable noise for residential living.

## ENGINE TESTING

- 40 No controls are noted regarding engine testing. As an airfield activity this could presumably take place anywhere within established areas or as a result of the Proposal, within Activity Area A. No information is provided to show the expected noise levels at dwellings within Activity Area A or Activity Area B, or at neighbouring rural dwellings which may be subject to increased engine testing noise exposure due to a potential broadening of the footprint of the designation.
- 41 Given that engine testing is ground-based it will also not be limited by daylight hours.
- 42 I recommend the applicant provide assessment of noise effects of engine testing for scenarios permitted by the Proposal, on potential new ASANs within the designation and existing ASANs on neighbouring land.

## INDUSTRIAL AND COMMERCIAL NOISE

- 43 The proposal includes industrial or commercial activities related to airfield operations as a permitted activity within Activity Area A: Airfield Central. Both activity areas in the designation also permit residential dwellings and/or visitor accommodation.

44 Industrial activities can cause high levels of noise. Often in industrial areas this noise can occur at extended/all hours. No assessment or evidence is provided which could give confidence that potential noise effects of industrial or commercial activities within the designation would be acceptable, either at other properties within the designation, or at rural dwellings in the surrounding area.

**Date:** 28/05/2024



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**Appendix G.**

**Expert Evidence of Hugh  
Nicholson**



**Before an INDEPENDENT HEARING PANEL  
Appointed by WAIMAKARIRI DISTRICT COUNCIL**

**UNDER** the Resource Management Act 1991

**IN THE MATTER OF** the Proposed Waimakariri District  
Plan

**AND**

**IN THE MATTER** Hearing Stream 12: Rezoning  
Requests (larger scale) and  
submission number 10  
Daniel Smith

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**STATEMENT OF EVIDENCE OF HUGH ANTHONY NICHOLSON  
ON BEHALF OF WAIMAKARIRI DISTRICT COUNCIL**

**LANDSCAPE ARCHITECTURE**

**17<sup>TH</sup> MAY 2024**

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6.	URBAN FORM .....	7
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## 1. INTRODUCTION

- 1.1 My full name is Hugh Anthony Nicholson. I am a Director at UrbanShift which is an independent consultancy that provides urban design and landscape architecture advice to local authorities and private clients.
- 1.2 I hold a Post-Graduate Diploma of Landscape Architecture from Lincoln University and a Post-Graduate Certificate in Urban Design from the University of Sydney. I have more than thirty years' experience in both the public and private sectors. I am a registered member of the New Zealand Institute of Landscape Architects (NZILA).
- 1.3 Prior to my current role, I worked as the Design Lead for the *Ōtākaro Avon River Regeneration Plan* with Regenerate Christchurch for two years, and as a Principal Urban Designer with Christchurch City Council for ten years. Before this I worked as an Urban Designer for the Wellington City Council for seven years.
- 1.4 I am a chair / member of the Nelson City / Tasman District Urban Design Panel and the Akaroa Design Review Panel. I was a member of the advisory panel for the development of the National Guidelines for Crime Prevention through Environmental Design (CPTED) for the Ministry of Justice, and a member of the Technical Advisory Group for the Wellington Waterfront.
- 1.5 My experience includes:
  - a. Project leader for the establishment of the Christchurch Urban Design Panel which reviews significant resource consent applications and significant Council public space projects (2008);
  - b. Project leader for *Public Space Public Life Studies* in Wellington (2004) and Christchurch (2009) in association with Gehl Architects which surveyed how people used different public spaces around the city centre, and how the quality of these public spaces could be improved;

- c. Steering group and design lead for *Share an Idea* and the Draft *Christchurch Central Recovery Plan* including associated draft district plan amendments to the central city zones which were subsequently reviewed and incorporated into the *Christchurch Central Recovery Plan*;
- d. Expert urban design witness for Christchurch City Council to the Independent Hearings Panel for the Christchurch Replacement District Plan on the Strategic Directions and Central City chapters;
- e. Design reviewer for more than fifty resource consent applications for major central city rebuilds for the Christchurch City Council including the Justice & Emergency Precinct, Tūranga (the central library), the Bus Interchange and the Christchurch Hospital Outpatients and Acute Services Buildings.
- f. Urban design and landscape peer reviewer and expert witness at hearings for private plan changes<sup>1</sup>, submissions on the Proposed Selwyn District Plan (SDP) and submissions on Variation 1 to the Proposed SDP, for the Selwyn District Council. I have been an expert witness in Environment Court mediations for two of the plan changes.

## **2. CODE OF CONDUCT**

- 2.1 I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and that I agree to comply with it. I confirm that I have considered all the material facts that I am aware of that might alter or detract from the opinions that I express, and that this evidence is within my area of expertise, except where I state that I am relying on the evidence of another person.

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<sup>1</sup> Private Plan Changes 67, 69, 71, 72, 73, 74, 79, 81 and 82

### **3. SCOPE**

3.1 I have been asked by the Waimakariri District Council to carry out a peer review of landscape matters relating to submission 10 for Hearing Stream 12: Rezoning Requests (larger scale) in the Proposed Waimakariri District Plan (Proposed WDP), in response to the rezoning submission of Daniel Smith.

3.2 In carrying out this assessment I have reviewed:

- a. The evidence of Mr Rory Langbridge and Mr Dean Chrystal;
- b. The relevant provisions of the Proposed WDP;
- c. *Our District Our Future - Waimakariri 2048 District Development Strategy*, Waimakariri District Council, 2018;
- d. *Residential Character and Intensification Guidance for Waimakariri District Council*, Jasmax, August 2018
- e. *Waimakariri District – Rural Character Assessment*, Boffa Miskell, 2018.

### **4. RECEIVING ENVIRONMENT**

4.1 I generally agree with Mr Langbridge's description of the broader scale context, the receiving environment and the landscape values, however, I would emphasise the extensive open spaces in the foreground associated with the airfield runways without any shelterbelts or fencing, the relatively dense cluster of airport buildings, the strong linear nature of the vegetation and stopbanks along the Ashley River in the midground, and the backdrop of the foothills behind.

### **5. LANDSCAPE ASSESSMENT**

5.1 I agree with Mr Langbridge that the land is proposed to be part of the Rural Lifestyle Zone (RLZ) and that it is appropriate to use this as a baseline to assess the landscape effects.

- 5.2 Mr Langbridge has selected five viewpoints to assess the visual impact. I would have preferred additional viewpoints from the airfield buildings, a publicly accessible area on the Ashley River stopbank, and the west from the extension to Priors Road in order to give a more rounded perspective.
- 5.3 I agree with Mr Langbridge that in Activity Area A “*all rural qualities will be replaced by a range of activities that have a more urban character with a strong residential/commercial and/or industrial flavour*”<sup>2</sup> and further that “*there is limited potential for the scale of these buildings located close to the airfield to be mitigated*”<sup>3</sup> due to restrictions on taller planting.
- 5.4 I also agree with Mr Langbridge that the anticipated activities in Activity Area A will be “*located prominently on the corner of Mertons and Prior Road with access ... potentially gained directly from adjacent roads*”<sup>4</sup>.
- 5.5 I note in particular that in Activity Area A there are limited restrictions on the form and number of buildings apart from a requirement to be in accordance with the ODP and a maximum height limit. There is provision for up to 30 residential units where they are linked to ‘core airside activities’.
- 5.6 While I agree with Mr Langbridge that not all landscape changes are adverse, given the changes in land use, the scale of the proposed built form and the visibility from public roads, I consider that this proposal could cause a significant change in landscape character and have a high degree of visual impact, adverse or otherwise.
- 5.7 I agree with Mr Langbridge that the residential activities in Activity Area B with a minimum site size of 5,000m<sup>2</sup> will retain some openness, however, I note that the subdivision includes two separate hard surfaced movement networks, roads and taxiways, and a maximum site coverage of 20% which would allow a large house and an aircraft hangar to be constructed. I understand that taller vegetation will also be restricted on the airfield side on the subdivision. I consider that Activity Area B could have a significantly

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<sup>2</sup> Statement of Evidence of Rory Langbridge, March 2024, paragraph 55

<sup>3</sup> Statement of Evidence of Rory Langbridge, March 2024, paragraph 60

<sup>4</sup> Statement of Evidence of Rory Langbridge, March 2024, paragraph 58

more urban character (with higher percentages of built form and hard surfaces) than the semi-rural character of the RLZ.

- 5.8 Mr Langbridge considers that the residential subdivision proposed in Activity Area B will “*serve as a useful transition between the largely commercial/industrial qualities of Activity Area A and the rural residential qualities of the RLZ*”<sup>5</sup>. I accept that Activity Area B will be less commercial/industrial in character than Activity Area A, however, in my opinion it could still have a significantly more urban character than the RLZ.
- 5.9 I agree with Mr Langbridge that an airfield and associated activities are not easily hidden and that a preferred strategy would be “*to ensure that the development outcome is cohesive and appealing to those who use it or those who will view it from local areas*”<sup>6</sup>.
- 5.10 In my opinion the proposed planning framework does not achieve this outcome. In particular no structure planning or investigation of options has been included. An illustrative masterplan demonstrating what is possible and / or intended would be helpful. I note that no design controls are proposed control the appearance of buildings and to promote a ‘cohesive and appealing development, and there are no standards relating to outdoor amenity for residential units.

## **6. URBAN FORM**

- 6.1 Fifty households could be considered to be a small village. For example Tuahiwi has approximately fifty houses in the village itself, and there are approximately fifty houses along Ōhoka’s main street, Mill Road. Of course both of these examples also have community facilities including schools, a marae, churches and stores.
- 6.2 Given the permissive nature of the zoning in Activity Area A it is possible that commercial and hospitality uses could be developed to serve the airport.

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<sup>5</sup> Statement of Evidence of Rory Langbridge, March 2024, paragraph 63

<sup>6</sup> Statement of Evidence of Rory Langbridge, March 2024, paragraph 57

Fifty households and a small cluster of shops, together with the surrounding rural residential housing and the commercial / industrial activities of the airport, might be considered to be more akin to a small urban settlement rather than an 'airpark'.

- 6.3 It is possible that a preferable outcome may be to design a more consciously urban mainstreet, largely outside the 55dB line, with public space on one side and airport activities on the other.
- 6.4 My understanding is that an new independent settlement is not what is intended, however, I consider it would be prudent to carefully consider a revised proposal in order to reduce the potential for unintended consequences.
- 6.5 I consider that a thoughtful masterplanned approach could deliver a cohesive and appealing development that provided higher amenity and better development outcomes while minimising adverse effects. The current proposal does not demonstrate this approach.
- 6.6 In my opinion the proposed planning framework does not clearly identify what urban form is anticipated, particularly in Activity Area A. It seems likely that an urban form similar to the existing cluster of buildings on the northern side of the airfield would be developed in Activity Area A, albeit with a residential component.

## **7. CONCLUSION**

- 7.1 I have reviewed the statements of evidence from the applicant with regard to the requested rezoning at Rangiora Airfield. In my opinion:
- a. The provision of rezoned land to support the provision of infrastructure and the ongoing operation of the Rangiora Airfield appears to be both sensible and achievable, however, there is the potential for unintended consequences if the planning framework is not carefully considered;



- b. Given the changes in land use, the scale of the proposed built forms, and the proximity to public roads and houses, the proposed rezoning could cause a significant change in landscape character and have a high degree of visual impact, adverse or otherwise;
- c. The proposed planning framework does not ensure a cohesive and appealing development. In particular no structure planning or illustrative masterplan has been included, and no design controls are proposed to control the appearance of buildings or to promote an attractive development with appropriate levels of amenity for various activities;
- d. The proposed planning framework requires additional refinement in order to minimise adverse effects on surrounding areas, and to avoid unintended or poor development outcomes.



**Hugh Nicholson**

16<sup>th</sup> May 2024

**Appendix H.**

**Waimakariri District Council  
Memo – Subject: North West  
Rangiora Water and  
Wastewater Servicing & Memo  
Addendum**

# WAIMAKARIRI DISTRICT COUNCIL

## MEMO

**FILE NO AND TRIM NO:** WAT-05-03-03 / 211006161247  
**DATE:** 28 September 2021  
**MEMO TO:** Kalley Simpson, 3 Waters Manager  
**FROM:** Alicia Klos, Senior Project Engineer  
**SUBJECT:** North West Rangiora Water and Wastewater Servicing

Kalley,

As requested, I have assessed the effects of connecting the development proposed by DM & AD Smith Investments in North West Rangiora, near the Rangiora Airfield.

### 1. Background

A developer is proposing to construct a development of rural residential lots and rural commercial lots around the Rangiora Airfield, along Merton and Priors Roads. This development intends to connect onto the Rangiora water and wastewater schemes.

Figure 1 presents a proposed developments layout plan given to the Waimakariri District Council (WDC).

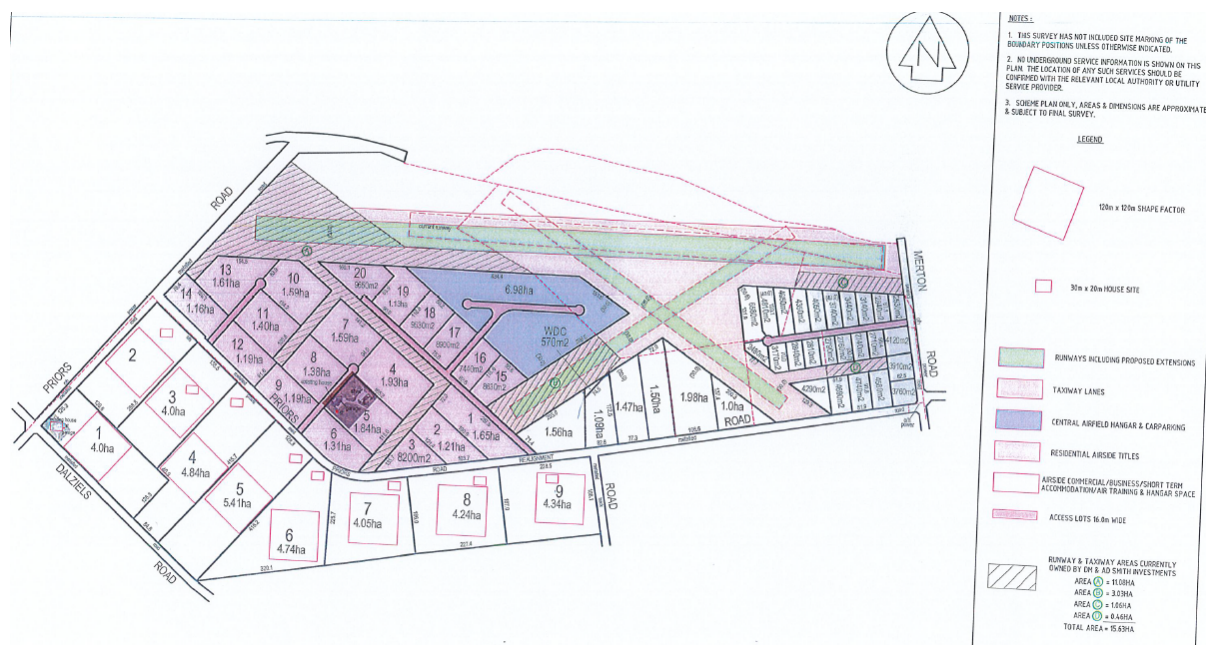


Figure 1: North West Rangiora Development Area – Proposed Section Layout

This proposed development has a total 60 lots, comprised of the following;

1. 20 Airside Titles
2. 25 Commercial Lots (10 Ha)
3. 9 Rural Residential Lots
4. 6 Rural Residential WDC Lots

All of these connections would be effectively rural connections and therefore be supplied with restricted water and pressure wastewater.

The following existing developments have also been identified as having potential to connect to this scheme extension due to their proximity to the proposed services:

- Rangiora Holiday Park on Lehmans Road
- 32 Rural Residential Lots along Lehmans and Priors Roads
- The Rangiora Airfield (10.2Ha)

The following options were investigated for water supply and wastewater for this exercise.

1. Option 1  
Full proposed development plus the developer proposed WDC land development (6 lots), Airfield (10.2Ha), Holiday Park (20 m<sup>3</sup>/day) and 32 additional existing restricted connections along route (64 units).
2. Option 2  
This is the same as option 1, only without the Holiday Park and 32 additional existing restricted connections (i.e. North West Rangiora around the airfield only).
3. Option 3  
This option modelled only the developer connections (i.e. only the proposed Airside Titles, Commercial Area and Rural Residential Lots). This model run was to calculate what the developer would require without servicing any other connections.

## 2. Water Servicing

Water modelling was undertaken using Mike Urban DHI EPANET software. The 50 year growth model was used as a base for this exercise to get the best prediction on what this developments impacts would be. Figure 2 presents the 2020 Rangiora Growth Map, all of these areas are either on demand residential or commercial growth areas, and have been included in this investigation.

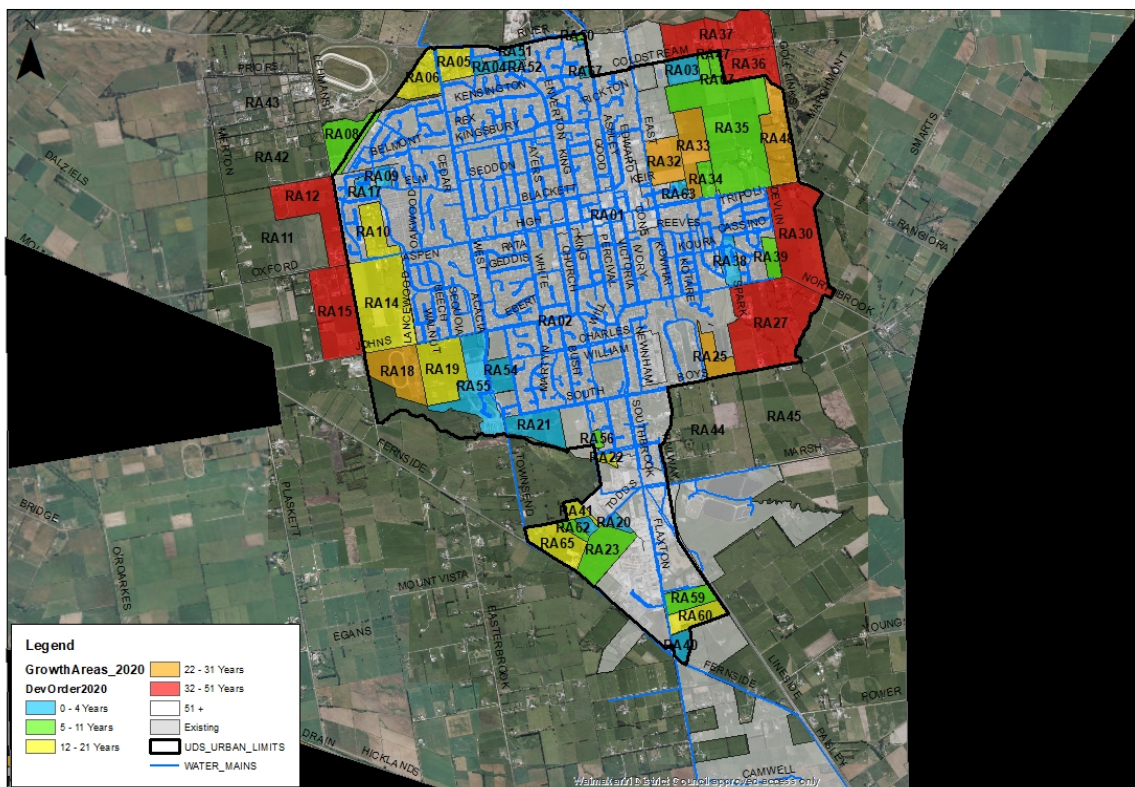


Figure 2: Rangiora 50 Year Growth Areas (2020 projection) - TRIM number 200224024348

## 2.1. Modelling Assumptions

All rural residential lots have been modelled to have a constant supply of 0.023L/s per connection plus 15% oversupply, so 0.026L/s per connection (two rating units). This flow was applied to the Airside, proposed rural residential and proposed WDC rural residential connections.

The commercial demand was modelled to be a restricted commercial supply. As there is no design guidance on this, the on-demand commercial modelling profile was averaged and applied to the commercial area (10Ha). The on demand commercial modelling profile was originally based on a combination of the code of practice peak hourly flow and actual flow data usage across the day. The profile was averaged to be 0.407L/s/Ha, including a 15% oversupply safety factor. Therefore it has been estimated that the proposed commercial area would demand 4.07L/s restricted supply.

This development potentially gives the WDC an opportunity to connect the Airfield into the Rangiora water supply and potentially some of the rural lots and Holiday Park along the pipe route.

The Airfield has had discussions with WDC staff and say they need more water than their well currently yields. The Rangiora Airfield currently has a well with a resource consent (CRC000066) for 54m<sup>3</sup>/day (0.6L/s). The area of airfield buildings was estimated to be 10.2Ha, and has been assumed to be the serviced area in this exercise. As their consented volume is not sufficient, in this exercise the Airfield has been modelled as a restricted commercial area. Therefore it has been estimated that the Airfield would demand 4.15L/s (10.2Ha x 0.407L/s/Ha) restricted supply.

The existing rural lots along the proposed supply pipeline route were modelled to require two restricted units, so 0.026L/s per connection. A conservative total of 32 existing restricted connections were allowed for in this exercise. WDC has found in the past that many of these properties may choose to keep their existing private well water supply and not connect, or maintain the well supply for irrigation.

The Rangiora Eco Holiday Park, would also be along the pipeline route. The Rangiora Eco Holiday Park has a well with a resource consent (CRC173899) for 173m<sup>3</sup>/day (2.0L/s). This flow was compared to others in the area; Woodend Beach Campground and the Rangiora Leigh Holiday Park. A Woodend Beach Campground profile was developed in 2013, and was based on Christmas period flow figures. The peak daily flow was found to be 22.5 m<sup>3</sup>/day. When the Rangiora Leigh Holiday Park applied to connect the WDC Loburn Lea wastewater scheme, it presented flow records of less than 20 m<sup>3</sup>/day, and now receives 20 m<sup>3</sup>/day restricted supply from the HDC rural scheme. The Rangiora Eco Holiday Park is smaller than these other holiday parks, so to be conservative in this exercise it has been assumed that they would require 20 m<sup>3</sup>/day (0.23L/s restricted supply). The holiday park may also choose to use their well for irrigation and the Rangiora water supply for drinking water to reduce their supply requirements.

The growth model has a development indicated south of the Rangiora Racecourse, north of Arlington. This development requires a 200mm diameter connection from Chatsworth Avenue to the paper road (Parrott Road), under the pylons. Then a ring fed 150mm diameter pipeline from the 200mm diameter to approximately 285 Lehman's Road. This has been included in the model and would require the WDC to fund an extra over cost through development contributions to get this pipeline section upsized.

Usually with water modelling for restricted schemes the pipeline capacities are recommended solely on achieving more than 150kPa pressure throughout the scheme. However due to the length and ground levels of this development, a booster pumpstation will be required. Therefore for this development the pipe sizes have been modelled to have a reasonable level of headloss (less than 10m/1000m), which is WDC's standard water modelling practice for urban areas.

The West Rangiora Structure Plan includes Council led water main upgrades to service several growth areas. The developments investigated in this report have not been included in the structure plan area. As part of the structure plan a development contribution fund has been set up to fund new water mains along Lehmans Road and the projects added to the long term plan. This work includes a 200mm diameter main from Oxford Road, then a 150mm diameter main from Parrott Road to roughly 285 Lehmans Road. As this has already been budgeted for this proportion of the work has been considered to be fully WDC funded (through West Rangiora Structure Plan development contributions).

## 2.2. Modelling Results

Figure 3, Figure 4 and Figure 5 present results from the water modelling. Refer to Appendix A for further details of the water modelling results.

Table 1 presents the demand assumed for servicing the development and existing connections.

*Table 1: Modelled water demand assumed for Options 1, 2 and 3.*

Description	Rating Units / Ha	Flow per Unit	Option 1	Option 2	Option 3
			Flow	Flow	Flow
Airside Rural Res	40	0.013 L/s	0.52 L/s	0.52 L/s	0.52 L/s
Commercial	10 Ha	0.407 L/s	4.07 L/s	4.07 L/s	4.07 L/s
Dev Rural Res	18	0.013 L/s	0.23 L/s	0.23 L/s	0.23 L/s
WDC Rural Res	12	0.013 L/s	0.16 L/s	0.16 L/s	0 L/s
Airfield	10.2 Ha	0.407 L/s	4.15 L/s	4.15 L/s	0 L/s
Holiday Park	1	0.230 L/s	0.23 L/s	0 L/s	0 L/s
Existing Rural 3	20	0.013 L/s	0.26 L/s	0 L/s	0 L/s
Existing Rural 2	30	0.013 L/s	0.39 L/s	0 L/s	0 L/s
Existing Rural 1	14	0.013 L/s	0.18 L/s	0 L/s	0 L/s
<b>Total</b>			<b>10.19 L/s</b>	<b>9.13 L/s</b>	<b>4.82 L/s</b>

It was found that the demand modelled in option 1 had no significant impact on supplying the WDC level of service to the existing Rangiora scheme and 50 year growth areas (shown in Figure 2), and would therefore have no impact on the current capital works schedule.

Option 1, the full development and existing lots, requires a 150mm diameter supply main from the connection to the commercial area, to keep headloss under 10m/1000m. A 100mm diameter main would be required into the airfield and commercial areas, and a 50mm diameter main for the rural residential lots. See Figure 3 for a map showing the recommended pipe sizes and serviced areas for this option.

Additionally, a booster pump station would be required to boost the pressure by 130kPa (and include chlorination equipment). The booster pumpstation location has not been specified as land would need to be purchased. However it is worth noting that 15m of pressure (restricted level of service requirement) is met up to the intersection of Priors and Merton Roads (for option 1), therefore the pumpstation location could be constructed at this intersection or anywhere upstream of this point.

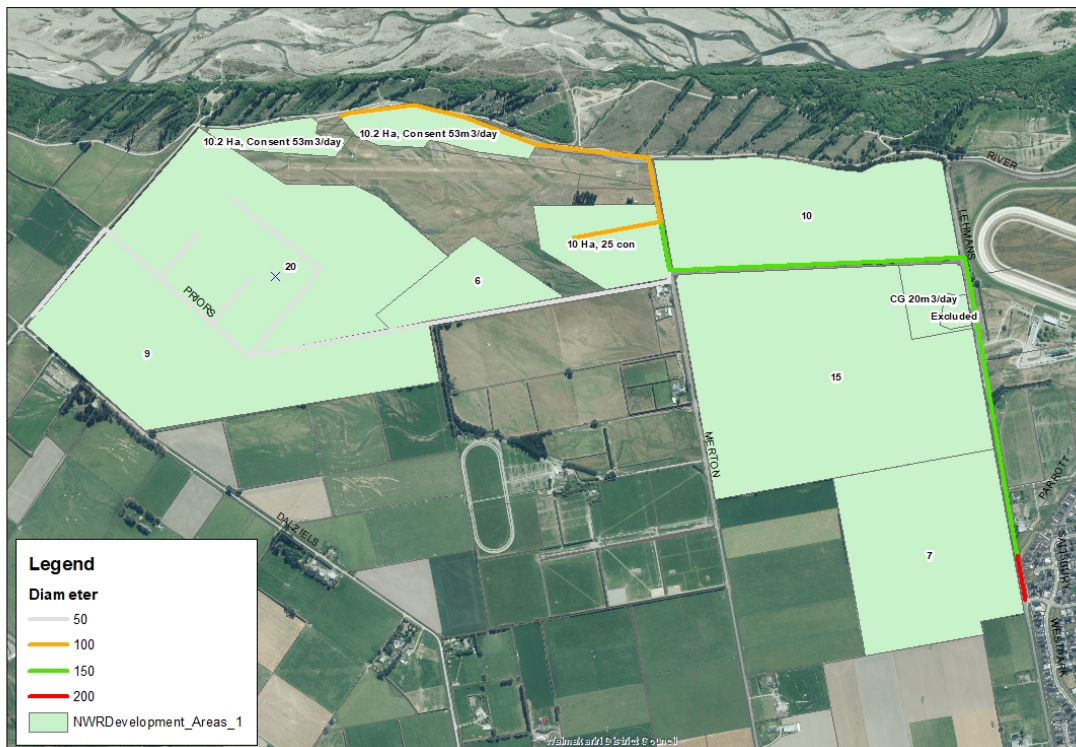


Figure 3: Option 1 water modelling results - recommended pipe sizes

Option 2, the full development without the Holiday Park and existing rural lots, would also require the same reticulation capacity as option 1. This shows that the existing rural lots and the Holiday Park do not have a significant bearing on the pipe sizing. See Figure 4 for a map showing the recommended pipe sizes and serviced areas for this option.

A booster pump would also be required, but only need to boost the pressure by 120kPa (and include chlorination equipment). The pumpstation location recommendations are similar to option 1.

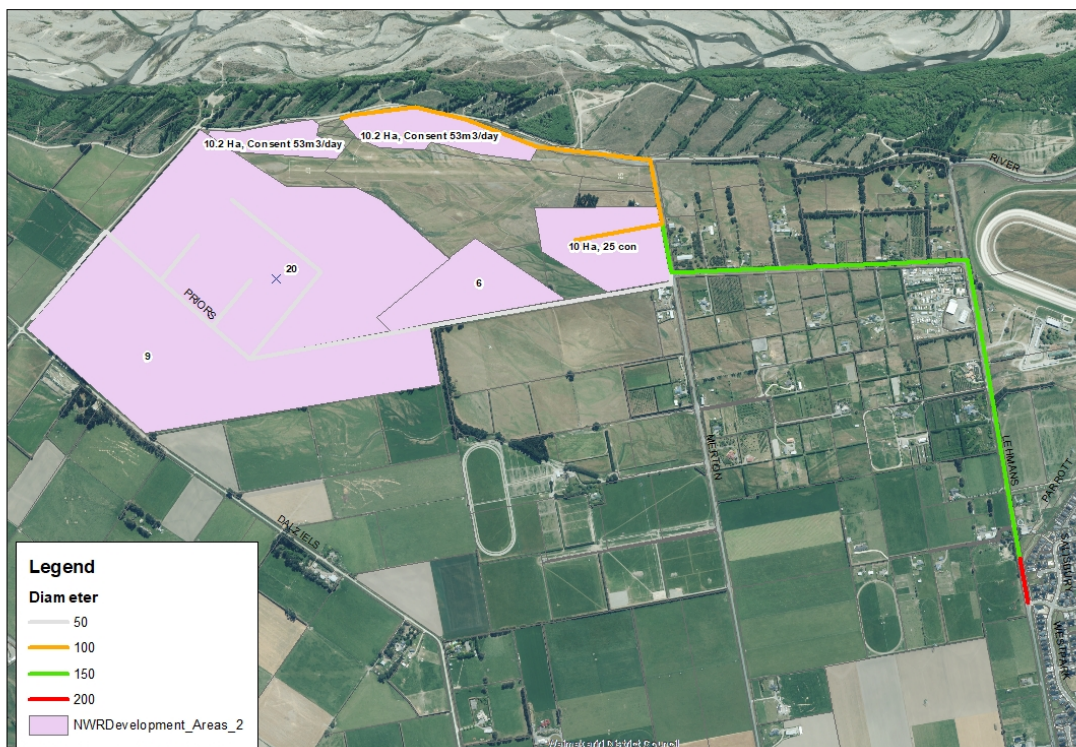


Figure 4: Option 2 water modelling results - recommended pipe sizes

Option 3, the developers demand only, would only require a 100mm diameter supply main to the development. But as this is a smaller pipeline the booster pumpstation would need to boost the pressure by 140kPa to overcome the long pipelines headloss, and the location of the pumpstation would also need to be at the intersection of Priors and Merton Roads or upstream (i.e. the same as the other two options). See Figure 5 for a map showing the recommended pipe sizes and serviced areas for this option.

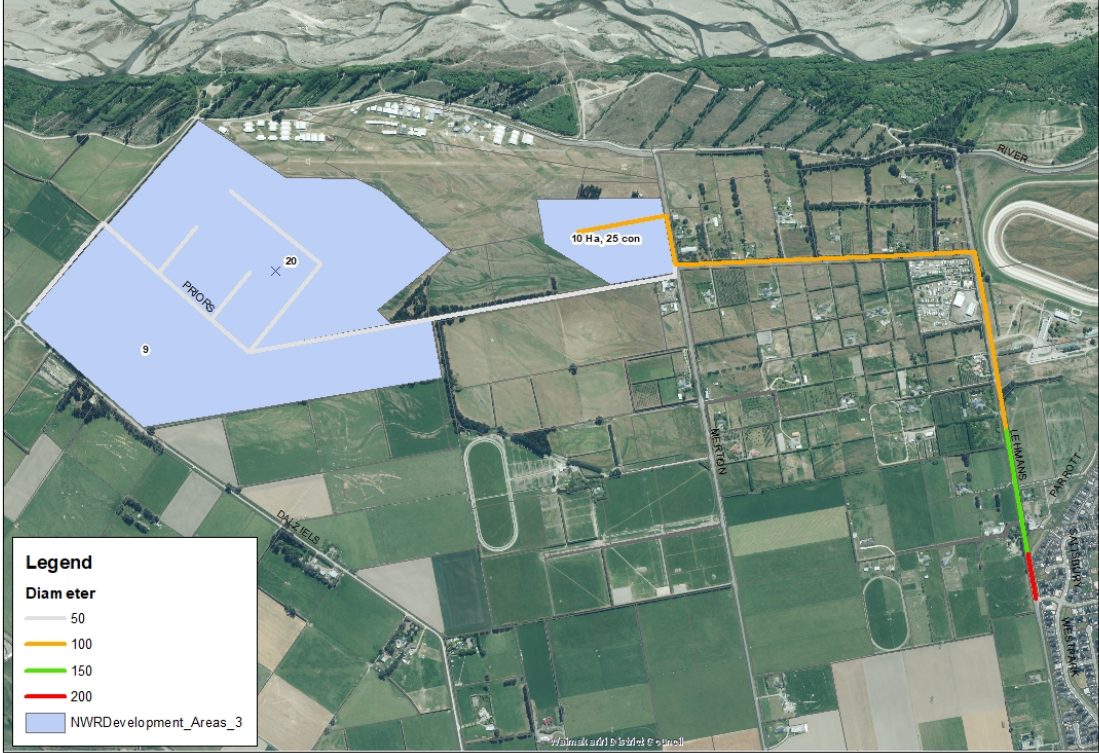


Figure 5: Option 3 water modelling results - recommended pipe sizes

For each of the options, a sub-option was run, where a 100mm main was modelled as the supply main from the connection point at Chatsworth Road to the corner of Priors and Merton Roads (refer to the Appendix A for these modelling results). For option 1 and 2 the supply main would have headloss higher than standard WDC modelling practices for urban mains (10m/1000m), however WDC has many restricted supply mains with higher headloss around the district, so this was considered acceptable. Additionally the proposed commercial, WDC existing restricted connections and the airfield were modelled conservatively, so the headloss is unlikely to be as high as that modelled. Therefore using a 100mm diameter supply main could be used for Option 1 and Option 2. An 100mm diameter main does increase the booster pumping requirements to 340kPa for option 1, and would need to be positioned further upstream, along the Lehmans Road section of the supply main.

Based on the modelling undertaken above, the recommended solution from this exercise is presented in Figure 6, which includes all of the proposed demand. This solution has a 200mm diameter main, a 150mm diameter main to the intersection of Lehmans and Priors Roads, then a 100mm diameter supply main to the intersection of Priors and Merton Roads.



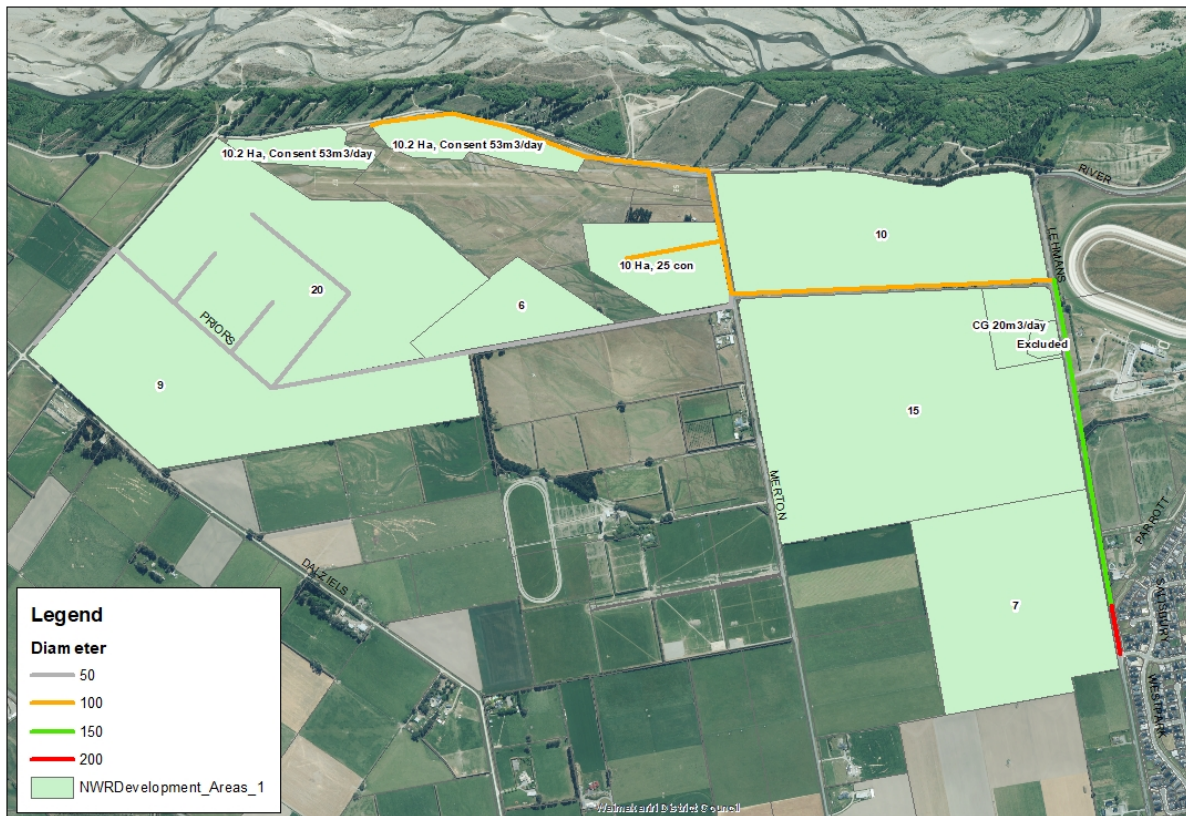


Figure 6: Recommended solution for water servicing in North West Rangiora

The results for this solution have headloss along Priors Road exceeding 15m/1000m, which is slightly higher than standard modelling practice in urban areas but in keeping with typical headloss figures in rural areas. Restricted pressure requirements of 150kPa are achieved until approximately half way along the Priors Road section, meaning that the booster pumpstation could be installed anywhere upstream of this. The booster pumpstation would need to be capable to 260kPa (and include chlorination equipment).

This solution is recommended for the following reasons;

- The 150mm diameter supply main to the intersection of Lehmans and Priors Roads has two main benefits.
  - o Firstly it lowers headloss and decreases the proposed pumpstation boosting pressure requirements.
  - o Secondly, although WDC doesn't have growth areas signalled in this area, this solution futureproofs this area and allows more options for growth in this area.
- The modelling is relatively conservative.
  - o In particular, the commercial demand (proposed commercial and airfield) allowed for in the modelling is considered conservative, and therefore the flows would be unlikely to reach the modelled levels. Once more clarity is given to the WDC around the commercial requirements (including the airfields demand) modelling could be rerun, but the difference in the results would likely be minor.
- A precedent has been set to accept higher headloss in the rural areas.
  - o Higher headlosses are accepted in many other rural schemes in the district. The key design requirement is usually the pressure requirements, headloss is usually a secondary modelling capacity tool.

### 2.3. Water Financial Estimates

The water financial estimates were based on the 2020 valuation rates for rising mains. Additionally a 6.2% increase was allowed for the Capital Goods Price Index increase since the valuation was undertaken. Also 12% professional fees and 40% contingency was also added to the estimates.

Costs were distributed based on the assumed flow proportion for water, presented in Table 1. Additionally, extra over costs were accounted for separately, for the 200mm diameter main upgrade which will be funded through development contributions.

The developer has proposed that the WDC develops a proportion of the Airfield Land along Priors Road (Figure 1), into 6 rural residential lots. As this is Airfield land, the cost has been apportioned to the Airfield for the cost estimates.

Refer to Appendix B for the full water cost estimate sheets.

Table 2 presents the cost estimate for Option 1, servicing the development, airfield, Holiday Park and existing rural residential lots along the proposed pipeline route (as shown in Figure 3).

*Table 2: Water cost estimate for option 1*

Description	Quantity	Proposed Main dia	Total Capital Cost	Rangiora West SP Development Contributions	Existing Connections	Rangiora Airfield	Developers Proportion
Existing Network to Parrott Rd (Paper Road)	150 m	200	\$47,000	\$47,000	\$0	\$0	\$0
Proposed 200mm to 285 Lehmans Road	420 m	150	\$101,000	\$101,000	\$0	\$0	\$0
285 Lehmans Road to Intersection Lehmans and Priors	600 m	150	\$144,000	\$0	\$15,003	\$60,850	\$68,148
Intersection Lehmans and Priors to Intersection Merton and Priors	1000 m	150	\$239,000	\$0	\$24,900	\$100,994	\$113,106
Intersection to Commercial Area	170 m	150	\$41,000	\$0	\$0	\$20,703	\$20,297
Commercial Area	300 m	100	\$55,000	\$0	\$0	\$0	\$55,000
Commercial Area to Airfield	1290 m	50	\$147,000	\$0	\$0	\$147,000	\$0
Intersection to proposed WDC Land Connection	700 m	50	\$80,000	\$0	\$0	\$13,714	\$66,286
WDC Land Connection to Remaining Rural Res Lots	2990 m	50	\$341,000	\$0	\$0	\$0	\$341,000
Booster Pumpstation	1		\$743,000	\$0	\$77,410	\$313,968	\$351,623
<b>Total</b>	<b>7621 m</b>		<b>\$1,938,000</b>	<b>\$148,000</b>	<b>\$117,300</b>	<b>\$657,200</b>	<b>\$1,015,500</b>

Table 3 presents the cost estimate for Option 2, servicing only the proposed development and the airfield (as shown in Figure 4).

*Table 3: Water cost estimate for option 2*

Description	Quantity	Proposed Main dia	Total Capital Cost	Rangiora West SP Development Contributions	Existing Connections	Rangiora Airfield	Developers Proportion
Existing Network to Parrott Rd (Paper Road)	150 m	200	\$47,000	\$47,000	\$0	\$0	\$0
Proposed 200mm to 285 Lehmans Road	420 m	150	\$101,000	\$101,000	\$0	\$0	\$0

285 Lehmans Road to Intersection Lehmans and Priors	600 m	150	\$144,000	\$0	\$0	\$67,927	\$76,073
Intersection Lehmans and Priors to Intersection Merton and Priors	1000 m	150	\$239,000	\$0	\$0	\$112,739	\$126,261
Intersection to Commercial Area	170 m	150	\$41,000	\$0	\$0	\$20,703	\$20,297
Commercial Area	300 m	100	\$55,000	\$0	\$0	\$0	\$55,000
Commercial Area to Airfield	1290 m	50	\$147,000	\$0	\$0	\$147,000	\$0
Intersection to proposed WDC Land Connection	700 m	50	\$80,000	\$0	\$0	\$13,714	\$66,286
WDC Land Connection to Remaining Rural Res Lots	2990 m	50	\$341,000	\$0	\$0	\$0	\$341,000
Booster Pumpstation	1		\$743,000	\$0	\$0	\$350,483	\$392,517
<b>Total</b>	<b>7621 m</b>		<b>\$1,938,000</b>	<b>\$148,000</b>	<b>\$0</b>	<b>\$713,000</b>	<b>\$1,077,000</b>

Table 4 presents the cost estimate for Option 3, the developer's requirements to service the proposed development (i.e. no WDC development near the airfield too, refer to Figure 5).

Table 4: Water cost estimate for option 3

Description	Quantity	Proposed Main dia	Total Capital Cost	Rangiora West SP Development Contributions	Existing Connections	Rangiora Airfield	Developers Proportion
Existing Network to Parrott Rd (Paper Road)	150 m	200	\$47,000	\$47,000	\$0	\$0	\$0
Proposed 200mm to 285 Lehmans Road	420 m	150	\$101,000	\$101,000	\$0	\$0	\$0
285 Lehmans Road to Intersection Lehmans and Priors	600 m	100	\$109,000	\$0	\$0	\$0	\$109,000
Intersection Lehmans and Priors to Intersection Merton and Priors	1000 m	100	\$182,000	\$0	\$0	\$0	\$182,000
Intersection to Commercial Area	170 m	100	\$31,000	\$0	\$0	\$0	\$31,000
Commercial Area	300 m	100	\$55,000	\$0	\$0	\$0	\$55,000
Commercial Area to Airfield	0 m	50	\$0	\$0	\$0	\$0	\$0
Intersection to proposed WDC Land Connection	700 m	50	\$80,000	\$0	\$0	\$0	\$80,000
WDC Land Connection to Remaining Rural Res Lots	2990 m	50	\$341,000	\$0	\$0	\$0	\$341,000
Booster Pumpstation	1		\$743,000	\$0	\$0	\$0	\$743,000
<b>Total</b>	<b>6331 m</b>		<b>\$1,689,000</b>	<b>\$148,000</b>	<b>\$0</b>	<b>\$0</b>	<b>\$1,541,000</b>

Table 5 presents the cost estimate for the recommended option, to have a 150mm supply pipe to the intersection of Lehmans and Priors Roads, then a 100mm diameter supply pipe beyond that point. This cost distribution is based on supplying everything (development, airfield and existing connections).

Table 5: Water cost estimate for the recommended option

Description	Quantity	Proposed Main dia	Total Capital Cost	Rangiora West SP Development Contributions	Existing Connections	Rangiora Airfield	Developers Proportion
Existing Network to Parrott Rd (Paper Road)	150 m	200	\$47,000	\$47,000	\$0	\$0	\$0
Proposed 200mm to 285 Lehmans Road	420 m	150	\$101,000	\$101,000	\$0	\$0	\$0

285 Lehmans Road to Intersection Lehmans and Priors	600 m	150	\$144,000	\$0	\$15,003	\$60,850	\$68,148
Intersection Lehmans and Priors to Intersection Merton and Priors	1000 m	100	\$182,000	\$0	\$18,962	\$76,907	\$86,131
Intersection to Commercial Area	170 m	100	\$31,000	\$0	\$0	\$15,653	\$15,347
Commercial Area	300 m	100	\$55,000	\$0	\$0	\$0	\$55,000
Commercial Area to Airfield	1290 m	50	\$147,000	\$0	\$0	\$147,000	\$0
Intersection to proposed WDC Land Connection	700 m	50	\$80,000	\$0	\$0	\$13,714	\$66,286
WDC Land Connection to Remaining Rural Res Lots	2990 m	50	\$341,000	\$0	\$0	\$0	\$341,000
Booster Pumpstation	1		\$743,000	\$0	\$77,410	\$313,968	\$351,623
<b>Total</b>	<b>7621 m</b>		<b>\$1,871,000</b>	<b>\$148,000</b>	<b>\$111,000</b>	<b>\$628,000</b>	<b>\$984,000</b>

Table 6 presents a summary of the cost estimates shown in Table 2 to Table 4, and in Appendix B.

*Table 6: Water Supply Summary of the Cost Estimates*

Summary	Total Capital Cost	Rangiora West SP Development Contributions	Existing Connections	Rangiora Airfield	Developers Proportion
Option 1 (150mm supply)	\$1,938,000	\$148,000	\$117,300	\$657,200	\$1,015,500
Option 2 (150mm supply)	\$1,938,000	\$148,000	\$0	\$713,000	\$1,077,000
Option 3 (100mm supply)	\$1,689,000	\$148,000	\$0	\$0	\$1,541,000
Recommended (Combo 150mm/100mm supply)	\$1,871,000	\$148,000	\$111,000	\$628,000	\$984,000

If the cost to supply all properties was split by their estimated flow requirements the WDC portion (existing, development contributions and Airfield) was estimated to be \$887,000 for the recommended option.

If the developer was to construct the pipelines to only service their development (i.e. option 3) for water, it is estimated to cost \$1.54 million.

If WDC was to take the approach that WDC would pay the extra-over to construct the recommended pipeline (i.e. the developer would require a 100mm diameter supply pipeline and WDC pay the extra-over to construct a 150mm diameter supply pipeline), then it was estimated to cost the WDC \$182,000 (cost share as existing, development contributions and airfield).

Further discussions should be had with the Holiday Park, existing properties and the Airfield so they are aware of the costs, including their share in supply mains and their on-site infrastructure requirements. The main priority should be to have a discussion with the airfield, as the Holiday Park and existing rural residential lots do not have a significant bearing on the pipe size requirements.

### 3. Wastewater Servicing

#### 3.1. Assumptions

It has been assumed that the proposed development would be serviced with a pressure wastewater network, with pumps on the rural residential and commercial properties designed to discharge into the Rangiora gravity network at Chatsworth Road.

Unlike water, there is no growth modelling for wastewater, however as mentioned in the water part of this investigation, there is a development to the south of the Rangiora racecourse that may also develop in the short term. The timing, density and discharge location for this development is unclear. Therefore, it is acknowledged that the North West Rangiora development could discharge further north into new infrastructure built by the Rangiora Racecourse development, but in this exercise a conservative view has been taken, having the connection at Chatsworth Road.

As there is no specific WDC Engineering Code of Practice guidance for pressure wastewater systems. For this exercise the sewer estimates were undertaken using the following table, which was based on Table 6.3 from the book *Small & Decentralized Wastewater Systems*, McGraw Hill, 1998 by Crites and Tchobanoglous. It is noted that this table was also used to size the Tuahiwi pressure sewer system.

*Table 7: Pressure sewer capacity guidelines. Small & Decentralized Wastewater Systems, McGraw Hill, 1998 by Crites and Tchobanoglous*

Number of Pumps connected upstream	Number of Pumpstations operating simultaneously	Estimated Max Flowrate (L/s)	Required pipe (assuming 1.0 m/s) (mm dia)	Recommended Nominal Pipe Size
1	1	0.7	29.9	50mm
2-3	2	1.4	42.2	
4-9	3	2.1	51.7	
10-18	4	2.8	59.7	65mm
19-30	5	3.5	66.8	
31-50	6	4.2	73.1	80mm
51-80	7	4.9	79.0	
81-113	8	5.6	84.4	100mm
114-146	9	6.3	89.6	
147-179	10	7	94.4	
180-212	11	7.7	99.0	
213-245	12	8.4	103.4	
246-278	13	9.1	107.6	

Table 7 was applied to the connections in this exercise by counting the number of connections (residential and commercial alike), to determine the pipe diameter required.

It was assumed that the Airfield would have the same wastewater loading as the proposed commercial area, as they were considered to have similar serviced area and water usage.

#### 3.2. Wastewater Results

Table 8 presents the assumed number of equivalent residential wastewater connections for the development and the existing connections.

*Table 8: Assumed number of equivalent wastewater connections*

Description	Option 1	Option 2	Option 3
	Lots/equivalent lots	Lots/equivalent lots	Lots/equivalent lots
Airside Rural Res	20	20	20
Commercial	25	25	25
Dev Rural Res	9	9	9
WDC Rural Res	6	6	0
Airfield	25	25	0
Holiday Park	30	0	0
Existing Rural 3	10	0	0

Existing Rural 2	15	0	0
Existing Rural 1	7	0	0
<b>Total</b>	<b>147</b>	<b>85</b>	<b>54</b>

Table 7 was used with Table 8 to determine the required wastewater pressure main capacity requirements for options 1, 2 and 3.

Option 1, the full development and existing lots, requires a 100mm diameter main to discharge the wastewater to the Rangiora gravity network, from the intersection of Merton and Priors Roads. The proposed commercial area and airfield would require a 65mm diameter wastewater main, then when combined an 80mm diameter main. Similarly, the rural residential areas would need 50mm diameter mains, which feed into a 65mm diameter main along Priors, then increase to an 80mm diameter main opposite the paper road along Priors Road. See Figure 7 for a map showing the recommended pipe sizes and serviced areas for this option.

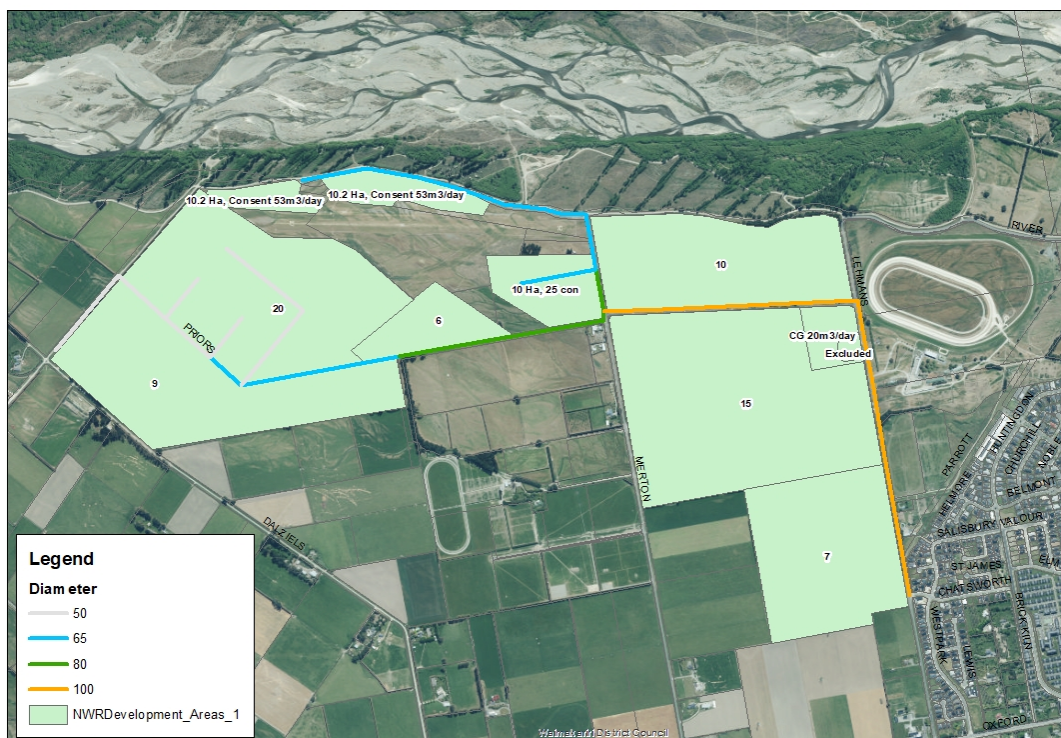


Figure 7: Option 1 - Pressure Wastewater Pipeline Map - recommended pipe sizes

Option 2, which is option 1 without the existing connections along Lehmanns and Priors Roads, has the same pipe size recommendations as option 1. See Figure 8 for a map showing the recommended pipe sizes and service areas for this option.

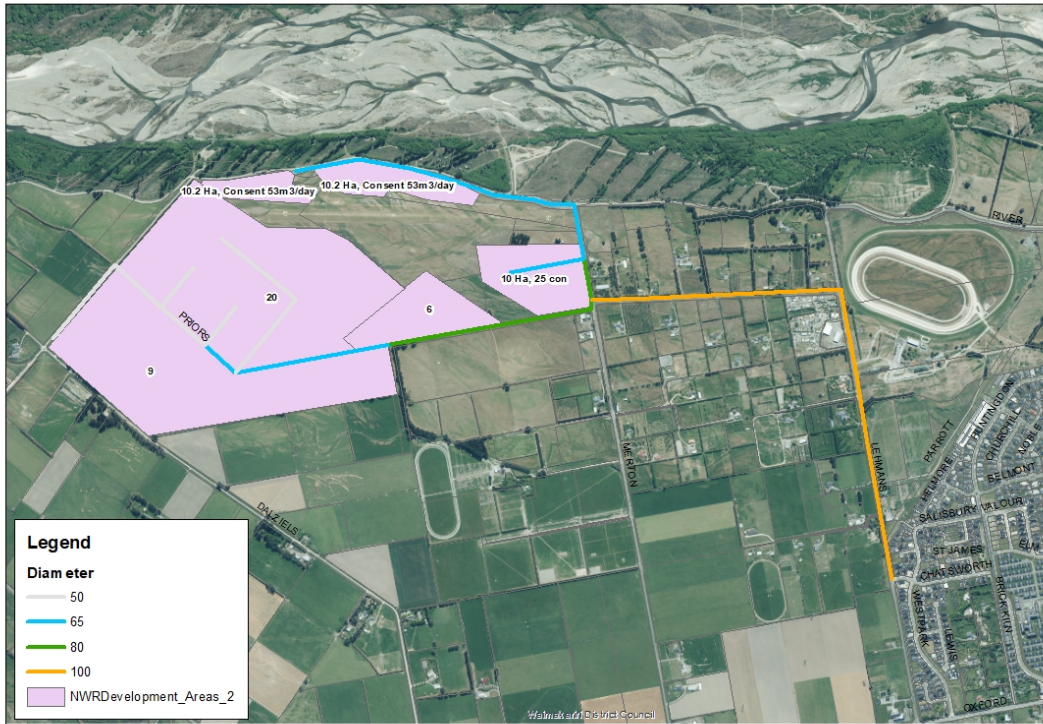


Figure 8: Option 2 - Pressure Wastewater Pipeline Map - recommended pipe sizes

Option 3, which is the scenario with only discharges from the proposed development, has smaller pipe sizes recommended. Rather than a 100mm diameter discharge main, it only requires an 80mm diameter main to discharge the wastewater into the Rangiora gravity wastewater network. Other changes include, the 80mm diameter main can be shorter from the residential area and only a 65mm diameter would be needed along Merton Road. See Figure 9 for a map showing the recommended pipe sizes and serviced areas for this option.

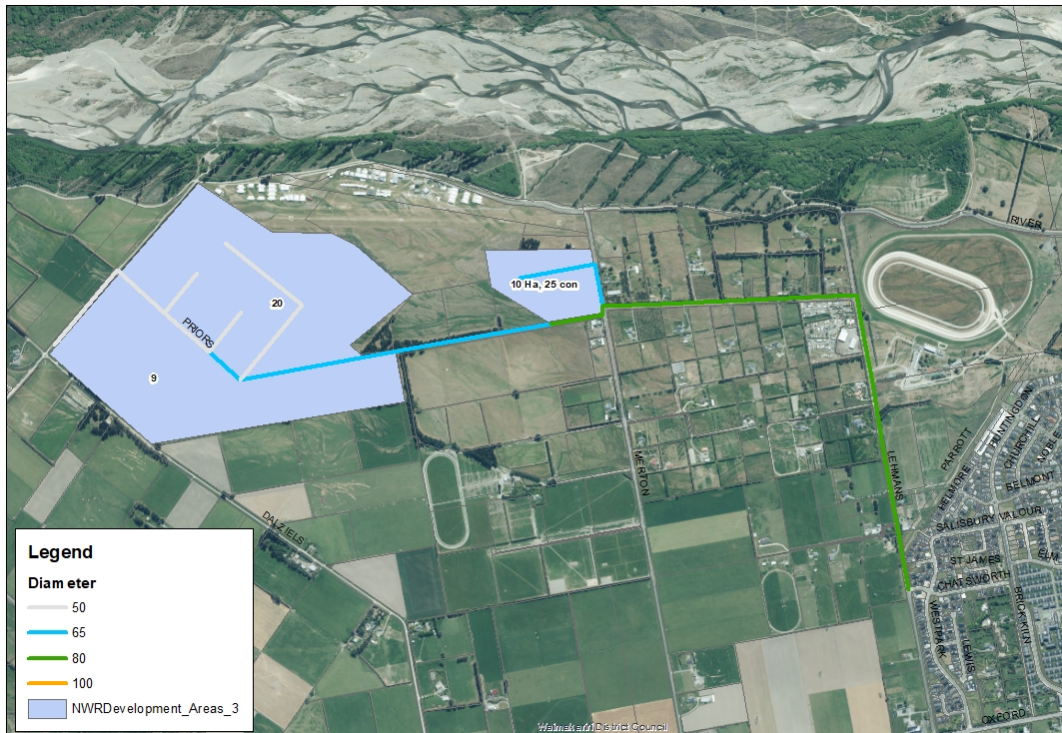


Figure 9: Option 3 - Pressure Wastewater Pipeline Map - recommended pipe sizes

The recommended solution could be any of the options above depending on the decision made regarding the number of discharges.

However is recommended that this development is treated independently for wastewater as the growth projections have not flagged any further rural (pressure wastewater) growth in this area. It is noted however that the discharge location may vary, depending on the order of development between North West Rangiora and the development south of the Rangiora racecourse.

### 3.3. Wastewater Financial Estimates

The wastewater financial estimates were based on the 2020 valuation rates for wastewater rising mains. Additionally a 6.2% increase was allowed for the Capital Goods Price Index increase since the valuation was undertaken. Also 12% professional fees and 40% contingency was also added to the estimates.

Costs were distributed based on the assumed equivalent lots, presented in Table 8.

Refer to Appendix C for the full wastewater cost estimate figures.

Table 9 presents the cost estimate for Option 1, servicing the development, airfield, Holiday Park and existing rural residential lots along the proposed alignment (Figure 7).

Table 9: Wastewater cost estimate for option 1

Rising Main Section	Costs					
	Required PE Pipe (OD)	Length	Total Cost	Existing Connections	Rangiora Airfield	Developers Proportion
Connection to Intersection Merton and Priors	100	2170	\$911,674	\$384,515	\$192,258	\$334,900
Intersection to Commercial Area	80	170	\$31,766	\$0	\$17,648	\$14,118
Commercial Area	65	300	\$50,452	\$0	\$0	\$50,452
Commercial Area to Airfield	65	1290	\$216,945	\$0	\$216,945	\$0
Intersection to east of Priors Road Commercial	80	240	\$44,846	\$0	\$6,727	\$38,119
Priors Road Commercial to Paper Road on Priors Road	80	610	\$113,985	\$0	\$19,540	\$94,444
Paper road along Priors Road to proposed lot 9 of Proposed General Rural Res	65	795	\$133,698	\$0	\$4,457	\$129,242
Proposed lot 9 of airside properties to the remainder of the western airside and rural res lots	50	1271	\$213,749	\$0	\$0	\$213,749
Airside lots 1-3 and 15-20	50	770	\$129,494	\$0	\$0	\$129,494
<b>Total</b>		<b>7616</b>	<b>\$1,847,000</b>	<b>\$384,500</b>	<b>\$457,600</b>	<b>\$1,004,500</b>

Table 10 presents the cost estimate for Option 2, servicing only the development and the airfield (Figure 8).

Table 10: Wastewater cost estimate for option 2

Rising Main Section	Costs					
	Required PE Pipe (OD)	Length	Total Cost	Existing Connections	Rangiora Airfield	Developers Proportion
Connection to Intersection Merton and Priors	100	2170	\$911,674	\$0	\$332,493	\$579,181
Intersection to Commercial Area	80	170	\$31,766	\$0	\$17,648	\$14,118
Commercial Area	65	300	\$50,452	\$0	\$0	\$50,452
Commercial Area to Airfield	65	1290	\$216,945	\$0	\$216,945	\$0
Intersection to east of Priors Road Commercial	80	240	\$44,846	\$0	\$6,727	\$38,119
Priors Road Commercial to Paper Road on Priors Road	80	610	\$113,985	\$0	\$19,540	\$94,444



Paper road along Priors Road to proposed lot 9 of Proposed General Rural Res	65	795	\$133,698	\$0	\$4,457	\$129,242
Proposed lot 9 of airside properties to the remainder of the western airside and rural res lots	50	1271	\$213,749	\$0	\$0	\$213,749
Airside lots 1-3 and 15-20	50	770	\$129,494	\$0	\$0	\$129,494
<b>Sub Total</b>		<b>7616</b>	<b>\$1,847,000</b>	<b>\$0</b>	<b>\$598,000</b>	<b>\$1,249,000</b>

Table 11 presents the cost estimate for Option 3, the developers requirements to service the proposed development (i.e. no WDC development near the airfield too, Figure 9).

Table 11: Wastewater cost estimate for option 3

Rising Main Section	Costs					
	Required PE Pipe (OD)	Length	Total Cost	Existing Connections	Rangiora Airfield	Developers Proportion
Connection to Intersection Merton and Priors	80	2170	\$405,486	\$0	\$0	\$405,486
Intersection to Commercial Area	65	170	\$28,590	\$0	\$0	\$28,590
Commercial Area	65	300	\$50,452	\$0	\$0	\$50,452
Commercial Area to Airfield		0	\$0	\$0	\$0	\$0
Intersection to east of Priors Road Commercial	80	240	\$44,846	\$0	\$0	\$44,846
Priors Road Commercial to Paper Road on Priors Road	65	610	\$102,586	\$0	\$0	\$102,586
Paper road along Priors Road to proposed lot 9 of Proposed General Rural Res	65	795	\$133,698	\$0	\$0	\$133,698
Proposed lot 9 of airside properties to the remainder of the western airside and rural res lots	50	1271	\$213,749	\$0	\$0	\$213,749
Airside lots 1-3 and 15-20	50	770	\$129,494	\$0	\$0	\$129,494
<b>Sub Total</b>		<b>6326</b>	<b>\$1,109,000</b>	<b>\$0</b>	<b>\$0</b>	<b>\$1,109,000</b>

Table 12 presents a summary of the cost estimates shown in Table 9 to Table 11, and in Appendix C.

Table 12: Wastewater Supply Summary of the Cost Estimates

Summary	Total Capital Cost	Existing Connections	Rangiora Airfield	Developers Proportion
Option 1 (100mm supply)	\$1,847,000	\$384,500	\$457,600	\$1,004,500
Option 2 (100mm supply)	\$1,847,000	\$0	\$598,000	\$1,249,000
Option 3 (80mm supply)	\$1,109,000	\$0	\$0	\$1,109,000

To service the development and Airfield for wastewater it is estimated to cost \$1.85 million. Connecting on the existing rural residential and Holiday Park consumers would not have an impact on the required reticulation, and therefore not impact on the overall cost. However the cost split would differ if the WDC intended to connect the existing rural residential properties and Holiday Park, where the developer would contribute \$1 million or \$1.25 million.

If the developer was to construct the pipelines to only service their development for wastewater, it was estimated to cost \$1.1 million.

If WDC was to take the approach that WDC would pay the extra-over to construct the recommended pipeline (i.e. the developer would require an 80mm diameter trunk main and WDC pay the extra-over to make it a 100mm diameter trunk main), then it was estimated to cost WDC \$738,000 (shared between existing connections and the Airfield).

#### **4. Recommendation**

There is a lot of uncertainty around the number of existing properties interested in connecting to a new water and wastewater network, including the airfield and holiday park. Although a WDC network would be more efficient in the long term, there may be hesitation due to the significant capital costs associated with a connection to Rangiora.

For example, this exercise has conservatively accounted for all the existing rural residential lots connecting to the networks. This level of interest is not expected initially, but ideally the pipelines should be designed to account for this option in the future. Additionally, discussions have not been had with the holiday park regarding requirements either. The Airfield has signalled that they want more water, however they seem to be unsure about how much water, and may need to undertake further investigations into the onsite requirements and costs for servicing for water and wastewater before they make a usage request.

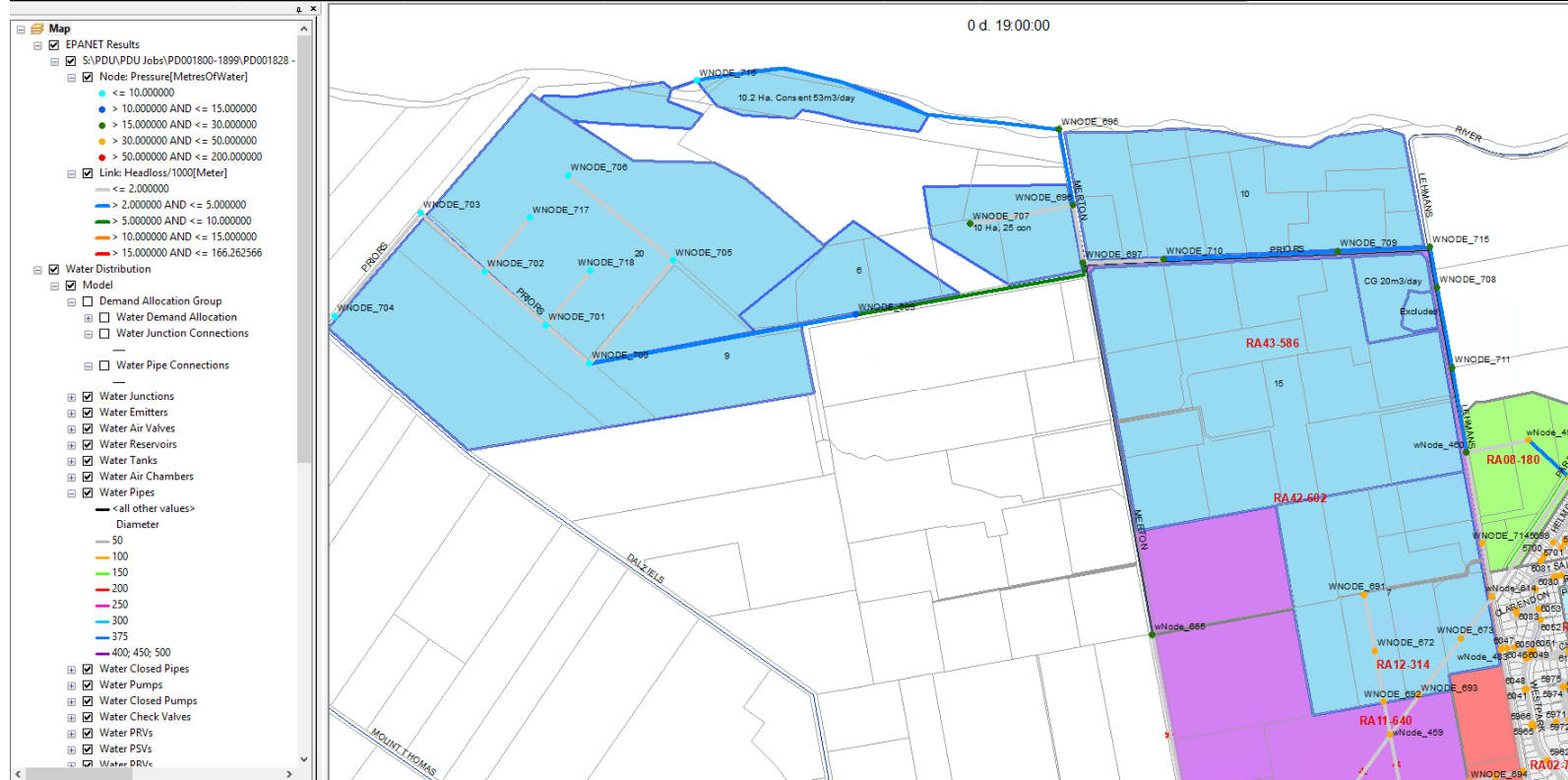
As there are many unknowns outside of servicing the development, it is recommended that the WDC consider requesting that the developer pays for the construction of the assets they require (option 3), and WDC does further investigation into servicing the other interested parties and potential future connections too. Or if the WDC does not want to handle the construction of this work, the WDC contacts the affected parties and discusses their interest in this new pipeline before construction.

## 5. Appendix

### 5.1. Appendix A – Water Modelling Results

Option 1 – All proposed connections - 150mm supply main

Pressure	WNODE_704	2.657	m		Required increase in Pressure	12.343	m	
HGL	Node WNODE_460	19:00	75.49	m				Options
Elevation	WNODE_704	19:00	61.57	m				Increase Rangiora Pressure by more than 130kPa
			13.92	Less than 15m - not possible				Booster Pumpstation to increase pressure by more than 130kPa
Strategy - size pipes for appropriate head losses <10m/1000m								



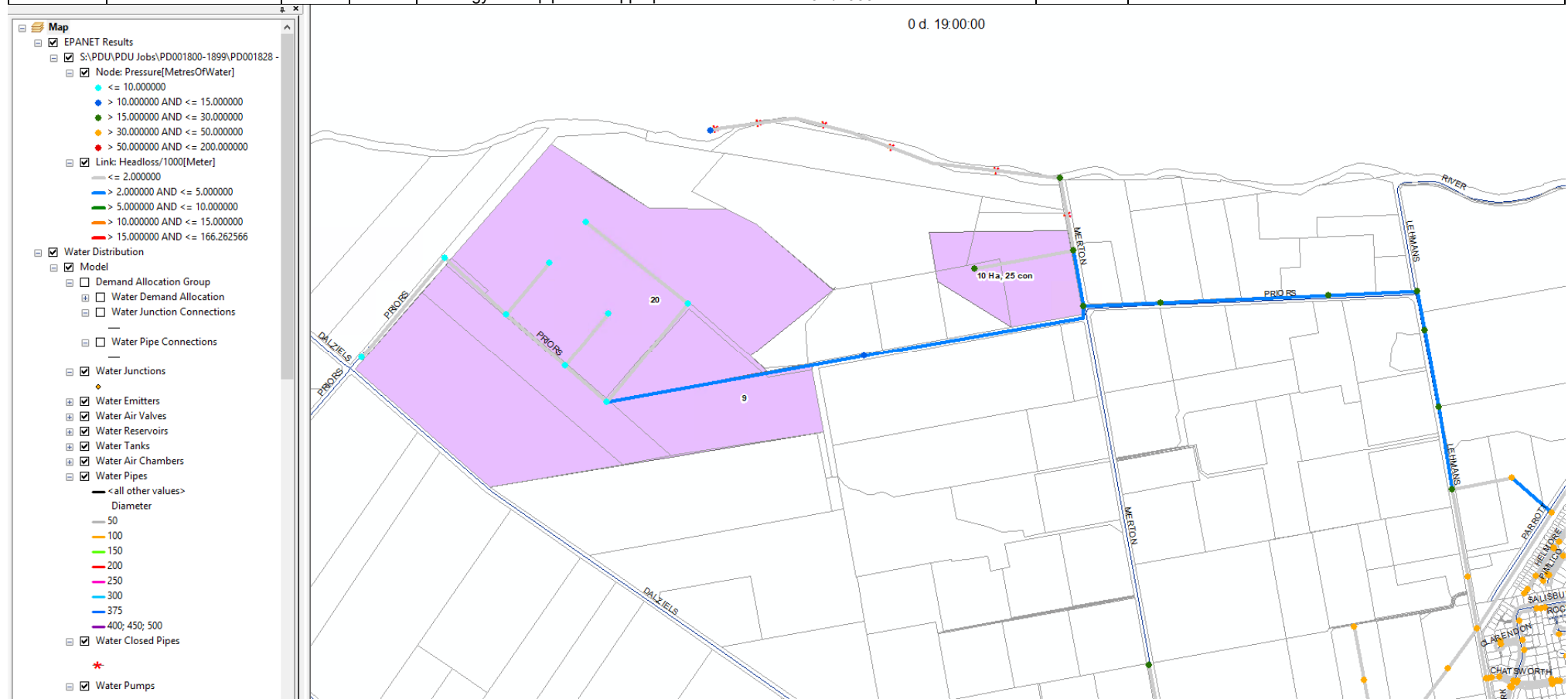
### Option 2 – Development and Airfield – 150mm supply main

Pressure	WNODE_704	3.092	m		Required increase in Pressure	11.908	m				
HGL	Node WNODE_460	19:00	75.6	m					Options		
Elevation	WNODE_704	19:00	61.57	m					Increase Rangiora Pressure by 120kPa		
			14.03	Less than 15m - not possible					Booster Pumpstation to increase pressure by 120kPa		
				Strategy - size pipes for appropriate head losses <10m/1000m							



### Option 3 – Only the Development

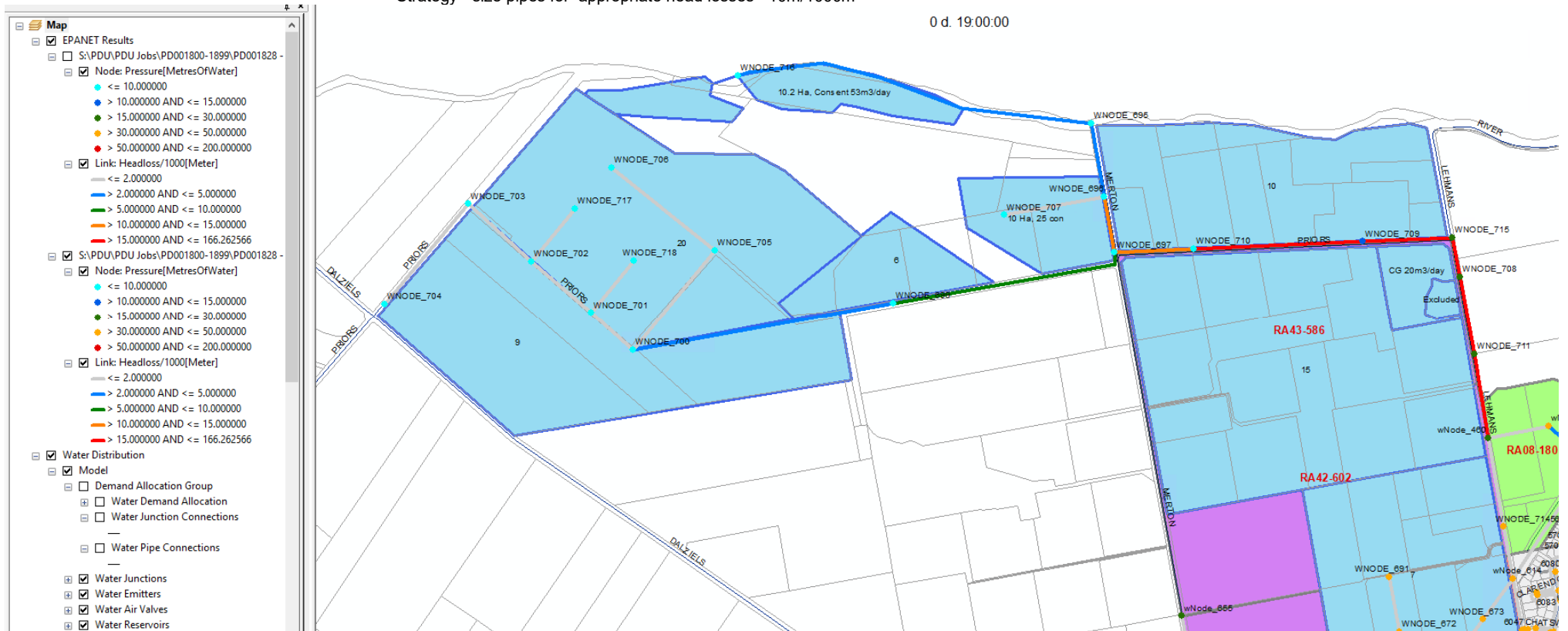
Pressure	WNODE_704	1.038	m		Required increase in Pressure	13.962	m	
HGL	Node WNODE_460	19:00	76.1	m				Options
Elevation	WNODE_704	19:00	61.57	m				Increase Rangiora Pressure by 140kPa
			14.53	Less than 15m - not possible				Boozer Pumpstation to increase pressure by 140kPa
				Strategy - size pipes for appropriate head losses <10m/1000m				



## Recommended Option

Pressure	WNODE_704	18.59	m	Required increase in Pressure	33.59	m	Headloss in Trunk Main	16.7	m/100m
HGL Elevation	Node	75.4							
	WNODE_460	19:00	9	m			Options		
	WNODE_704	19:00	7	m			Increase Rangiora Pressure by more than 340kPa		
			13.9	Less than 15m - not possible			Boozer Pumpstation to increase pressure by more than 340kPa		

Strategy - size pipes for appropriate head losses <10m/1000m



## 5.2. Appendix B – Full Water Financial Calculations

Option 1															
Description	Quantity	Proposed Main dia	Proposed Main Material	2020 Rate pipe, Valve and Hydrant	Additional for CGPI	Upgrade cost	Fees and Contingency	Total Capital Cost	WDC Airfield Development	Existing Connections (based on flow)	Airfield (based on flow)	Rangiora West SP Development Contribution	Existing Connections	Rangiora Airfield	Developer's Proportion
Existing Network to Parrott Rd (Paper Road)	150 m	200	PE	\$193	6.2%	\$30,777	\$16,004	\$47,000	0%	0%	0%	\$47,000	\$0	\$0	\$0
Proposed 200mm to 285 Lehmans Road	420 m	150	PE	\$148	6.2%	\$66,148	\$34,397	\$101,000	0%	0%	0%	\$101,000	\$0	\$0	\$0
285 Lehmans Road to Intersection Lehmans and Priors	600 m	150	PE	\$148	6.2%	\$94,497	\$49,138	\$144,000	2%	10%	41%	\$0	\$15,003	\$60,850	\$68,148
Intersection Lehmans and Priors to Intersection Merton and Priors	1000 m	150	PE	\$148	6.2%	\$157,495	\$81,897	\$239,000	2%	10%	41%	\$0	\$24,900	\$100,994	\$113,106
Intersection to Commercial Area	170 m	150	PE	\$148	6.2%	\$26,774	\$13,923	\$41,000	0%	0%	50%	\$0	\$0	\$20,703	\$20,297
Commercial Area	300 m	100	PE	\$113	6.2%	\$35,874	\$18,655	\$55,000	0%	0%	0%	\$0	\$0	\$0	\$55,000
Commercial Area to Airfield	1290 m	50	PE	\$71	6.2%	\$96,721	\$50,295	\$147,000	0%	0%	100%	\$0	\$0	\$147,000	\$0
Intersection to proposed WDC Land Connection	700 m	50	PE	\$71	6.2%	\$52,484	\$27,292	\$80,000	17%	0%	0%	\$0	\$0	\$13,714	\$66,286
WDC Land Connection to Remaining Rural Res Lots	2990 m	50	PE	\$71	6.2%	\$224,182	\$116,575	\$341,000	0%	0%	0%	\$0	\$0	\$0	\$341,000
Booster Pumpstation	1			\$460,000	6.2%	\$488,520	\$254,030	\$743,000	2%	10%	41%	\$0	\$77,410	\$313,968	\$351,623
<b>Total</b>	<b>7621 m</b>					<b>\$1,273,471</b>	<b>\$662,205</b>	<b>\$1,938,000</b>				<b>\$148,000</b>	<b>\$117,300</b>	<b>\$657,200</b>	<b>\$1,015,500</b>

Recommended Option															
Description	Quantity	Proposed Main dia	Proposed Main Material	2020 Rate pipe, Valve and Hydrant	Additional for CGPI	Upgrade cost	Fees and Contingency	Total Capital Cost	Rangiora West SP Development Contribution	Existing Connections (based on flow)	Airfield (based on flow)	Rangiora West SP Development Contribution	Existing Connections	Rangiora Airfield	Developer's Proportion
Existing Network to Parrott Rd (Paper Road)	150 m	200	PE	\$193	6.2%	\$30,777	\$16,004	\$47,000	0%	0%	0%	\$47,000	\$0	\$0	\$0
Proposed 200mm to 285 Lehmans Road	420 m	150	PE	\$148	6.2%	\$66,148	\$34,397	\$101,000	0%	0%	0%	\$101,000	\$0	\$0	\$0
285 Lehmans Road to Intersection Lehmans and Priors	600 m	150	PE	\$148	6.2%	\$94,497	\$49,138	\$144,000	2%	10%	41%	\$0	\$15,003	\$60,850	\$68,148
Intersection Lehmans and Priors to	1000 m	100	PE	\$113	6.2%	\$119,581	\$62,182	\$182,000	2%	10%	41%	\$0	\$18,962	\$76,907	\$86,131

Intersection Merton and Priors															
Intersection to Commercial Area	170 m	100	PE	\$113	6.2%	\$20,329	\$10,571	\$31,000	0%	0%	50%	\$0	\$0	\$15,653	\$15,347
Commercial Area	300 m	100	PE	\$113	6.2%	\$35,874	\$18,655	\$55,000	0%	0%	0%	\$0	\$0	\$0	\$55,000
Commercial Area to Airfield	1290 m	50	PE	\$71	6.2%	\$96,721	\$50,295	\$147,000	0%	0%	100%	\$0	\$0	\$147,000	\$0
Intersection to proposed WDC Land Connection	700 m	50	PE	\$71	6.2%	\$52,484	\$27,292	\$80,000	17%	0%	0%	\$0	\$0	\$13,714	\$66,286
WDC Land Connection to Remaining Rural Res Lots	2990 m	50	PE	\$71	6.2%	\$224,182	\$116,575	\$341,000	0%	0%	0%	\$0	\$0	\$0	\$341,000
Booster Pumpstation	1			\$460,000	6.2%	\$488,520	\$254,030	\$743,000	2%	10%	41%	\$0	\$77,410	\$313,968	\$351,623
<b>Total</b>	<b>7621 m</b>					<b>\$1,229,112</b>	<b>\$639,138</b>	<b>\$1,871,000</b>				<b>\$148,000</b>	<b>\$111,000</b>	<b>\$628,000</b>	<b>\$984,000</b>

### Option 2

Description	Quantity	Proposed Main dia	Proposed Main Material	2020 Rate pipe, Valve and Hydrant	Additional for CGPI	Upgrade cost	Fees and Contingency	Total Capital Cost	Rangiora West SP Development Contribution	Existing Connections (based on flow)	Airfield (based on flow)	Rangiora West SP Development Contribution	Existing Connections	Rangiora Airfield	Developer's Proportion
Existing Network to Parrott Rd (Paper Road)	150 m	200	PE	\$193	6.2%	\$30,777	\$16,004	\$47,000	0%	0%	0%	\$47,000	\$0	\$0	\$0
Proposed 200mm to 285 Lehmans Road	420 m	150	PE	\$148	6.2%	\$66,148	\$34,397	\$101,000	0%	0%	0%	\$101,000	\$0	\$0	\$0
285 Lehmans Road to Intersection Lehmans and Priors	600 m	150	PE	\$148	6.2%	\$94,497	\$49,138	\$144,000	2%	0%	45%	\$0	\$0	\$67,927	\$76,073
Intersection Lehmans and Priors to Intersection Merton and Priors	1000 m	150	PE	\$148	6.2%	\$157,495	\$81,897	\$239,000	2%	0%	45%	\$0	\$0	\$112,739	\$126,261
Intersection to Commercial Area	170 m	150	PE	\$148	6.2%	\$26,774	\$13,923	\$41,000	0%	0%	50%	\$0	\$0	\$20,703	\$20,297
Commercial Area	300 m	100	PE	\$113	6.2%	\$35,874	\$18,655	\$55,000	0%	0%	0%	\$0	\$0	\$0	\$55,000
Commercial Area to Airfield	1290 m	50	PE	\$71	6.2%	\$96,721	\$50,295	\$147,000	0%	0%	100%	\$0	\$0	\$147,000	\$0
Intersection to proposed WDC Land Connection	700 m	50	PE	\$71	6.2%	\$52,484	\$27,292	\$80,000	17%	0%	0%	\$0	\$0	\$13,714	\$66,286
WDC Land Connection to Remaining Rural Res Lots	2990 m	50	PE	\$71	6.2%	\$224,182	\$116,575	\$341,000	0%	0%	0%	\$0	\$0	\$0	\$341,000
Booster Pumpstation	1			\$460,000	6.2%	\$488,520	\$254,030	\$743,000	2%	0%	45%	\$0	\$0	\$350,483	\$392,517
<b>Total</b>	<b>7621 m</b>					<b>\$1,273,471</b>	<b>\$662,205</b>	<b>\$1,938,000</b>				<b>\$148,000</b>	<b>\$0</b>	<b>\$713,000</b>	<b>\$1,077,000</b>



**Option 3 - Development Alone**

Description	Quantity	Proposed Main dia	Proposed Main Material	2020 Rate pipe, Valve and Hydrant	Additional for CGPI	Upgrade cost	Fees and Contingency	Total Capital Cost	Rangiora West SP Development Contribution	Existing Connections (based on flow)	Airfield (based on flow)	Rangiora West SP Development Contribution	Existing Connections	Rangiora Airfield	Developer's Proportion
Existing Network to Parrott Rd (Paper Road)	150 m	200	PE	\$193	6.2%	\$30,777	\$16,004	\$47,000	0%	0%	0%	\$47,000	\$0	\$0	\$0
Proposed 200mm to 285 Lehmans Road	420 m	150	PE	\$148	6.2%	\$66,148	\$34,397	\$101,000	0%	0%	0%	\$101,000	\$0	\$0	\$0
285 Lehmans Road to Intersection Lehmans and Priors	600 m	100	PE	\$113	6.2%	\$71,749	\$37,309	\$109,000	0%	0%	0%	\$0	\$0	\$0	\$109,000
Intersection Lehmans and Priors to Intersection Merton and Priors	1000 m	100	PE	\$113	6.2%	\$119,581	\$62,182	\$182,000	0%	0%	0%	\$0	\$0	\$0	\$182,000
Intersection to Commercial Area	170 m	100	PE	\$113	6.2%	\$20,329	\$10,571	\$31,000	0%	0%	0%	\$0	\$0	\$0	\$31,000
Commercial Area	300 m	100	PE	\$113	6.2%	\$35,874	\$18,655	\$55,000	0%	0%	0%	\$0	\$0	\$0	\$55,000
Commercial Area to Airfield	0 m	50	PE	\$71	6.2%	\$0	\$0	\$0	0%	0%	0%	\$0	\$0	\$0	\$0
Intersection to proposed WDC Land Connection	700 m	50	PE	\$71	6.2%	\$52,484	\$27,292	\$80,000	0%	0%	0%	\$0	\$0	\$0	\$80,000
WDC Land Connection to Remaining Rural Res Lots	2990 m	50	PE	\$71	6.2%	\$224,182	\$116,575	\$341,000	0%	0%	0%	\$0	\$0	\$0	\$341,000
Booster Pumpstation	1			\$460,000	6.2%	\$488,520	\$254,030	\$743,000	0%	0%	0%	\$0	\$0	\$0	\$743,000
<b>Total</b>	<b>6331 m</b>					<b>\$1,109,643</b>	<b>\$577,015</b>	<b>\$1,689,000</b>				<b>\$148,000</b>	<b>\$0</b>	<b>\$0</b>	<b>\$1,541,000</b>

### 5.3. Appendix C – Full Wastewater Financial Calculations

Option 1																			
Rising Main Section	Sub Area	Number of lots Contributing WW Asset	Developer Lots	Existing Connections	Airfield	Ground Condition	Costs												
							Required PE Pipe (OD)	Length	Valuation Rates 2019-20 Urban / Rural split	Adjustment for poor ground conditions	Addition for CGPI	Base Rate incl. Extra Over and CGPI(\$)	Professional Fees 12%	Funding Contingency 40%	Total Cost	Cost per Connection	Existing Connections	Rangiora Airfield	Developer's Proportion
Connection to Intersection Merton and Priors	All	147	54	62	31	High - 4/5	100	2170	\$252.30	\$252.30	6.20%	\$267.94	\$69,771	\$260,478	\$911,674	\$6,202	\$384,515	\$192,258	\$334,900
Intersection to Commercial Area	Commercial and Airfield	45	20	0	25	High - 4/5	80	170	\$112.21	\$112.21	6.20%	\$119.17	\$2,431	\$9,076	\$31,766	\$706	\$0	\$17,648	\$14,118
Commercial Area	Commercial	20	20	0	0	High - 4/5	65	300	\$100.99	\$100.99	6.20%	\$107.25	\$3,861	\$14,415	\$50,452	\$2,523	\$0	\$0	\$50,452
Commercial Area to Airfield	Airfield	25	0	0	25	High - 4/5	65	1290	\$100.99	\$100.99	6.20%	\$107.25	\$16,603	\$61,984	\$216,945	\$8,678	\$0	\$216,945	\$0
Intersection to east of Priors Road Commercial	Proposed Rural Res, Airside, WDC Rural Res, 5 commercial	40	34	0	6	High - 4/5	80	240	\$112.21	\$112.21	6.20%	\$119.17	\$3,432	\$12,813	\$44,846	\$1,121	\$0	\$6,727	\$38,119
Priors Road Commercial to Paper Road on Priors Road	Proposed Rural Res, Airside, WDC Rural Res	35	29	0	6	High - 4/6	80	610	\$112.21	\$112.21	6.20%	\$119.17	\$8,723	\$32,567	\$113,985	\$3,257	\$0	\$19,540	\$94,444
Paper road along Priors Road to proposed lot 9 of Proposed General Rural Res	1 WDC Rural Res, Airside and Rural Res	30	29	0	1	High - 4/5	65	795	\$100.99	\$100.99	6.20%	\$107.25	\$10,232	\$38,200	\$133,698	\$4,457	\$0	\$4,457	\$129,242
Proposed lot 9 of airside properties to the remainder of the western airside and rural res lots	Airside 10-14 and 1-4 Proposed Rural Res	9	9	0	0	High - 4/5	50	1271	\$100.99	\$100.99	6.20%	\$107.25	\$16,358	\$61,071	\$213,749	\$23,750	\$0	\$0	\$213,749
Airside lots 1-3 and 15-20	Airside lots 1-3 and 15-20	9	9	0	0	High - 4/5	50	770	\$100.99	\$100.99	6.20%	\$107.25	\$9,910	\$36,998	\$129,494	\$14,388	\$0	\$0	\$129,494
<b>Sub Total</b>								<b>7616</b>							<b>\$1,847,000</b>	<b>\$7,200</b>	<b>\$384,500</b>	<b>\$457,600</b>	<b>\$1,004,500</b>

Option 2																			
Rising Main Section	Sub Area	Number of lots Contributing WW Asset	Developer Lots	Existing Connections	Airfield	Ground Condition	Costs												
							Required PE Pipe (OD)	Length	Valuation Rates 2019-20 Urban / Rural split	Adjustment for poor ground conditions	Addition for CGPI	Base Rate incl. Extra Over and CGPI(\$)	Professional Fees 12%	Funding Contingency 40%	Total Cost	Cost per Connection	Existing Connections	Rangiora Airfield	Developer's Proportion
Connection to Intersection Merton and Priors	All	85	54	0	31	High - 4/5	100	2170	\$252.30	\$252.30	6.20%	\$267.94	\$69,771	\$260,478	\$911,674	\$10,726	\$0	\$332,493	\$579,181

Intersection to Commercial Area	Commercial and Airfield	45	20	0	25	High - 4/5	80	170	\$112.21	\$112.21	6.20%	\$119.17	\$2,431	\$9,076	\$31,766	\$706	\$0	\$17,648	\$14,118
Commercial Area	Commercial	20	20	0	0	High - 4/5	65	300	\$100.99	\$100.99	6.20%	\$107.25	\$3,861	\$14,415	\$50,452	\$2,523	\$0	\$0	\$50,452
Commercial Area to Airfield	Airfield	25	0	0	25	High - 4/5	65	1290	\$100.99	\$100.99	6.20%	\$107.25	\$16,603	\$61,984	\$216,945	\$8,678	\$0	\$216,945	\$0
Intersection to east of Priors Road Commercial	Proposed Rural Res, Airside, WDC Rural Res, 5 commercial	40	34	0	6	High - 4/5	80	240	\$112.21	\$112.21	6.20%	\$119.17	\$3,432	\$12,813	\$44,846	\$1,121	\$0	\$6,727	\$38,119
Priors Road Commercial to Paper Road on Priors Road	Proposed Rural Res, Airside, WDC Rural Res	35	29	0	6	High - 4/6	80	610	\$112.21	\$112.21	6.20%	\$119.17	\$8,723	\$32,567	\$113,985	\$3,257	\$0	\$19,540	\$94,444
Paper road along Priors Road to proposed lot 9 of Proposed General Rural Res	1 WDC Rural Res, Airside and Rural Res	30	29	0	1	High - 4/5	65	795	\$100.99	\$100.99	6.20%	\$107.25	\$10,232	\$38,200	\$133,698	\$4,457	\$0	\$4,457	\$129,242
Proposed lot 9 of airside properties to the remainder of the western airside and rural res lots	Airside 10-14 and 1-4 Proposed Rural Res	9	9	0	0	High - 4/5	50	1271	\$100.99	\$100.99	6.20%	\$107.25	\$16,358	\$61,071	\$213,749	\$23,750	\$0	\$0	\$213,749
Airside lots 1-3 and 15-20	Airside lots 1-3 and 15-20	9	9	0	0	High - 4/5	50	770	\$100.99	\$100.99	6.20%	\$107.25	\$9,910	\$36,998	\$129,494	\$14,388	\$0	\$0	\$129,494
<b>Sub Total</b>								<b>7616</b>							<b>\$1,847,000</b>	<b>\$7,700</b>	<b>\$0</b>	<b>\$598,000</b>	<b>\$1,249,000</b>

Option 3

Rising Main Section	Sub Area	Number of lots Contributing WW Asset	Developer Lots	Existing Connections	Airfield	Ground Condition	Costs												
							Required PE Pipe (OD)	Length	Valuation Rates 2019-20 Urban / Rural split	Adjustment for poor ground conditions	Additional for CGPI	Base Rate incl. Extra Over and CGPI(\$)	Professional Fees 12%	Funding Contingency 40%	Total Cost	Cost per Connection	Existing Connections	Rangiora Airfield	Developer's Proportion
Connection to Intersection Merton and Priors	All	54	54	0	0	High - 4/5	80	2170	\$112.21	\$112.21	6.20%	\$119.17	\$31,032	\$115,853	\$405,486	\$7,509	\$0	\$0	\$405,486
Intersection to Commercial Area	Commercial and Airfield	20	20	0	0	High - 4/5	65	170	\$100.99	\$100.99	6.20%	\$107.25	\$2,188	\$8,168	\$28,590	\$1,429	\$0	\$0	\$28,590
Commercial Area	Commercial	20	20	0	0	High - 4/5	65	300	\$100.99	\$100.99	6.20%	\$107.25	\$3,861	\$14,415	\$50,452	\$2,523	\$0	\$0	\$50,452
Commercial Area to Airfield	Airfield	0	0	0	0	High - 4/5		0		\$0.00	6.20%	\$0.00	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Intersection to east of Priors Road Commercial	Proposed Rural Res, Airside, WDC Rural Res, 5 commercial	34	34	0	0	High - 4/5	80	240	\$112.21	\$112.21	6.20%	\$119.17	\$3,432	\$12,813	\$44,846	\$1,319	\$0	\$0	\$44,846
Priors Road Commercial to Paper Road on Priors Road	Proposed Rural Res, Airside, WDC Rural Res	29	29	0	0	High - 4/6	65	610	\$100.99	\$100.99	6.20%	\$107.25	\$7,851	\$29,310	\$102,586	\$3,537	\$0	\$0	\$102,586
Paper road along Priors Road to proposed lot 9 of Proposed General Rural Res	1 WDC Rural Res, Airside and Rural Res	29	29	0	0	High - 4/5	65	795	\$100.99	\$100.99	6.20%	\$107.25	\$10,232	\$38,200	\$133,698	\$4,610	\$0	\$0	\$133,698

<b>Proposed lot 9 of airside properties to the remainder of the western airside and rural res lots</b>	Airside 10-14 and 1-4 Proposed Rural Res	9	9	0	0	High - 4/5	50	1271	\$100.99	\$100.99	6.20%	\$107.25	\$16,358	\$61,071	\$213,749	\$23,750	\$0	\$0	\$213,749
<b>Airside lots 1-3 and 15- 20</b>	Airside lots 1-3 and 15-20	9	9	0	0	High - 4/5	50	770	\$100.99	\$100.99	6.20%	\$107.25	\$9,910	\$36,998	\$129,494	\$14,388	\$0	\$0	\$129,494
<b>Sub Total</b>								<b>6326</b>							<b>\$1,109,000</b>	<b>\$6,600</b>	<b>\$0</b>	<b>\$0</b>	<b>\$1,109,000</b>

**WAIMAKARIRI DISTRICT COUNCIL**

**MEMO**

**FILE NO AND TRIM NO:** WAT-05-03-03 / 211006161247  
**DATE:** 16 May 2023  
**MEMO TO:** Kalley Simpson, 3 Waters Manager  
**FROM:** Sam Murphy, Senior Civil Engineer  
**SUBJECT:** North West Rangiora Water and Wastewater Servicing

**1. Summary**

The purpose of this memo is to provide updated cost estimates and allocations for the North West Rangiora Water and Wastewater Servicing, based on the latest proposal for the Airfield redevelopment and proposed subdivision development by DA & AD Smith Investments Ltd.

This is an addendum to the memo produced by Alicia Klos, Senior Project Engineer (TRIM 211006161247). Since the original memo was produced in September 2021, there have been minor changes to proposed pipe diameters due to lot numbers and resulting water demand, as well as significant price movements due to the volatility of inflation and associated increases to the Capital Good Price Index (CGPI) which has resulted in higher pipe and civil works costs.

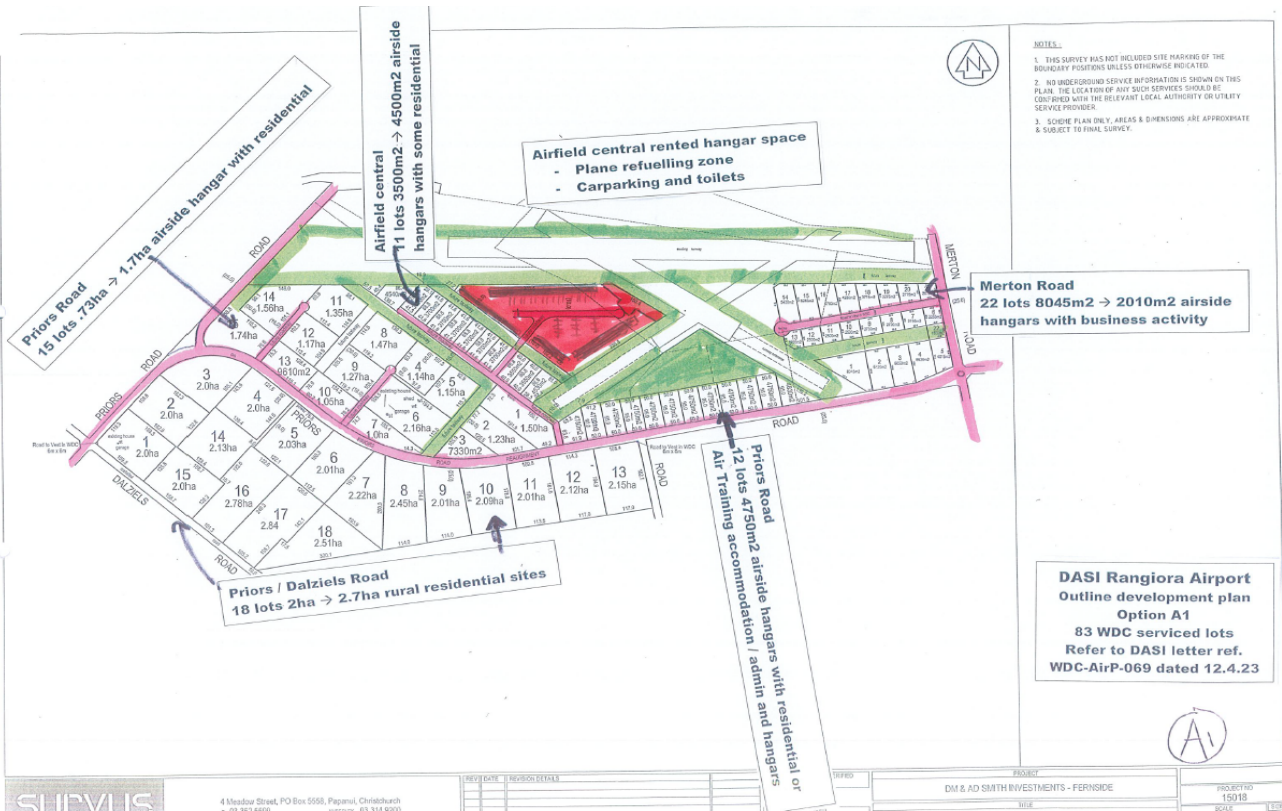


Figure 1: North West Rangiora Development Area – Latest Section Layout

## **2. Background**

DA & AD Smith Investments Ltd (the developer) is proposing to construct a development of rural residential lots and rural commercial lots around the Rangiora Airfield, along Merton and Priors Roads. This development intends to connect onto the Rangiora water and wastewater schemes.

The latest proposed development plan has a total 79 lots, comprised of the following;

1. 38 Airside Titles
2. 22 Commercial Lots
3. 18 Rural Residential Lots
4. 1 Central "Super-Lot" (Central Hangar space with refuelling zone)

All of these connections would be effectively rural connections and therefore be supplied with restricted water and pressure wastewater.

The following existing developments have also been identified as having potential to connect to this scheme extension due to their proximity to the proposed services:

- Rangiora Holiday Park on Lehmans Road
- WDC Rural residential lots adjacent the airfield.
- The Rangiora Airfield (10.2Ha)
- DA & AD Smith Investments Ltd

Based on the previous memo (211006161247), multiple options were identified with Option 1 (the preferred option) being the one on which this current memo is based:

### ***Option 1 Proposal***

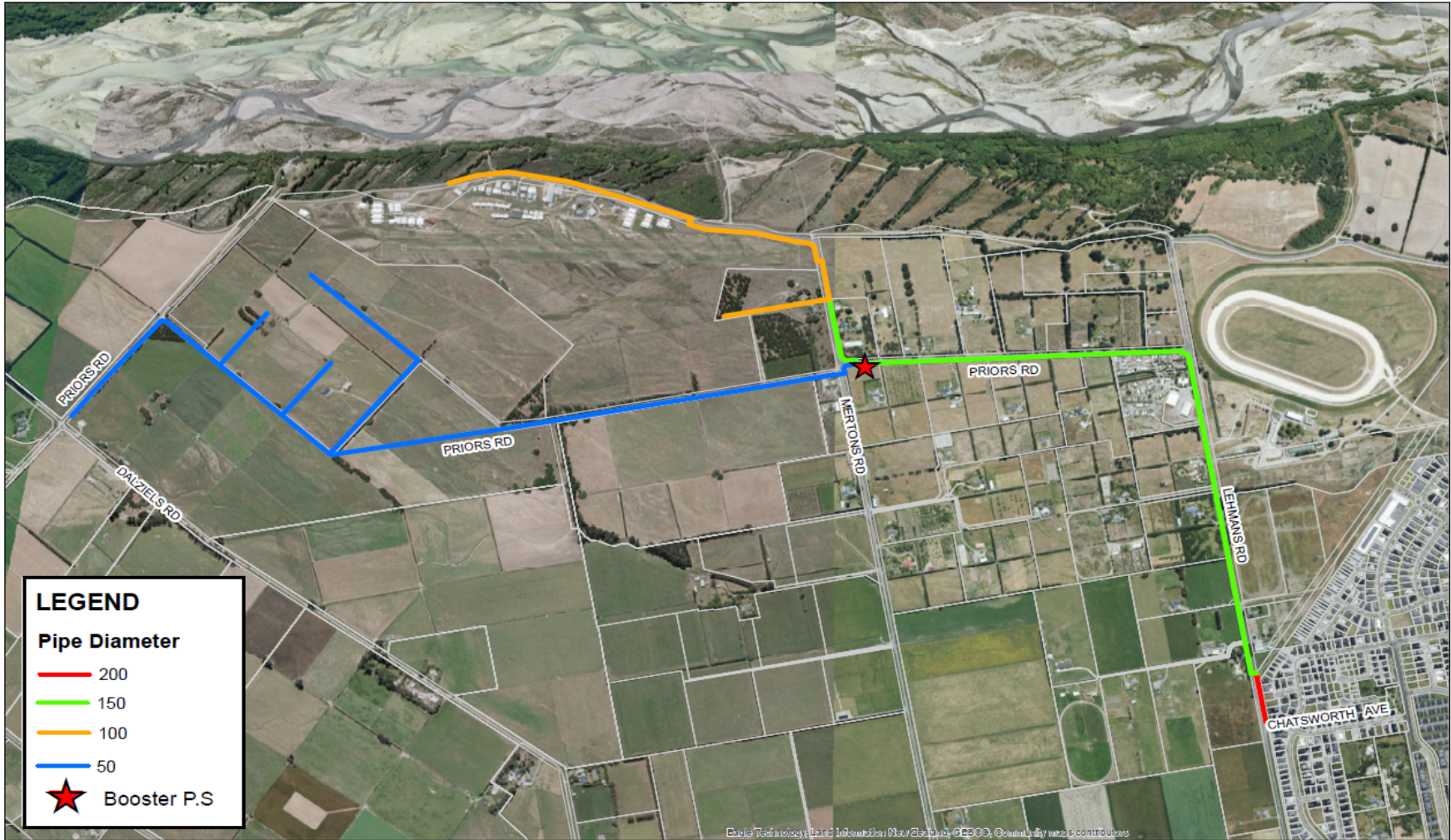
Full proposed development by DA & AD Smith Investments Ltd plus the developer proposed WDC land development, Airfield (10.2Ha) and the Eco Holiday Park.

Based on the latest development plan from the developer, updated pipe sizing has now been modelled and updated costings have been calculated. These updated costings reflect minor increases to pipe sizes due to additional Lots proposed by the developer and also take into account price adjustments from September 2021 (when costs were first estimated) to June 2022 (the latest Valuation figures which have been adjusted for Consumer Good Price Index (CGPI)). Further CGPI increases were then applied to match the expected installation date as per the staged implementation below.

It is proposed that these works are constructed in three Stages.

- Stage 1 will connect water and wastewater services to the existing reticulation at Chatsworth Avenue and lay new pipes to the intersection of Lehmans Road and Priors Road. This will enable the Eco Holiday Park to connect to these mains. The CPGI increases mentioned above assume installation of Stage 1 in 2023/24.
- Stage 2 works will involve the laying of mains from Lehmans Road and Priors Road intersection, into the existing airfield and to the proposed developers commercial subdivision. The CPGI increases mentioned above assume installation of Stage 2 in 2024/25.
- Stage 3 works will then complete the remainder to the reticulated network to the WDC rural residential lots and to DA & AD Smith Investments Ltd properties along Priors Rd to Dalziels Road. The CPGI increases mentioned above assume installation of Stage 3 in 2025/26.

The maps below show the updated pipe sizing for both the proposed water and wastewater reticulated network required to service the properties in this area.



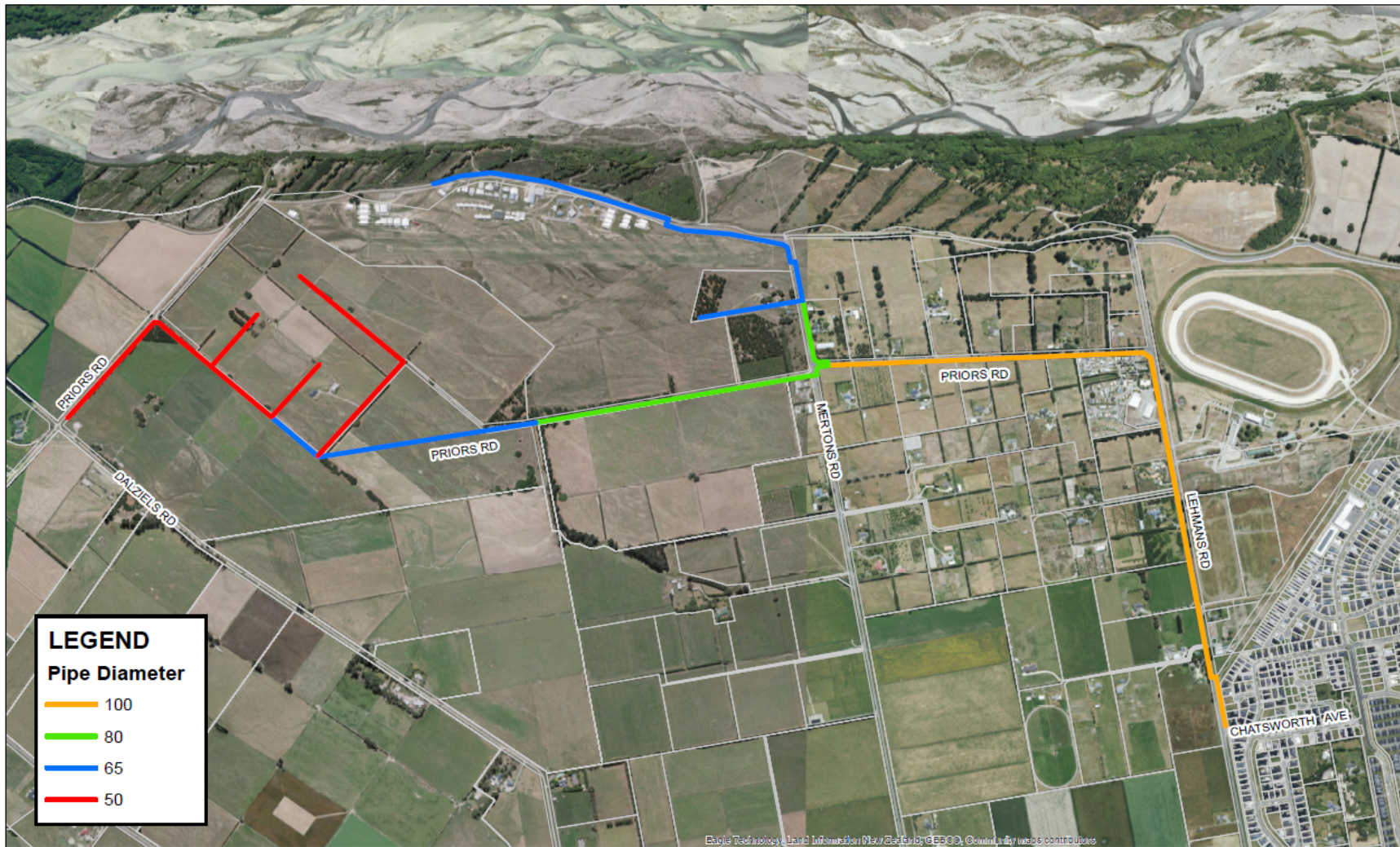
**LEGEND**

**Pipe Diameter**

- 200
- 150
- 100
- 50
- ★ Booster P.S

 <b>WAIMAKARIRI</b> DISTRICT COUNCIL	<b>NORTH WEST RANGIORA - AIRFIELD DEVELOPMENT</b> <b>WATER SERVICING</b>	SCALE (A3) <b>1:10,000</b>	
		DATE <b>12/05/2023</b>	

Figure 1: Reticulated Water Network



	<b>NORTH WEST RANGIORA - AIRFIELD DEVELOPMENT WASTEWATER SERVICING</b>	SCALE (A3)	
		1:10,000	
		DATE	12/05/2023

Figure 2 - Reticulated Wastewater Network



## 2.1. Water Demand and Cost Allocations

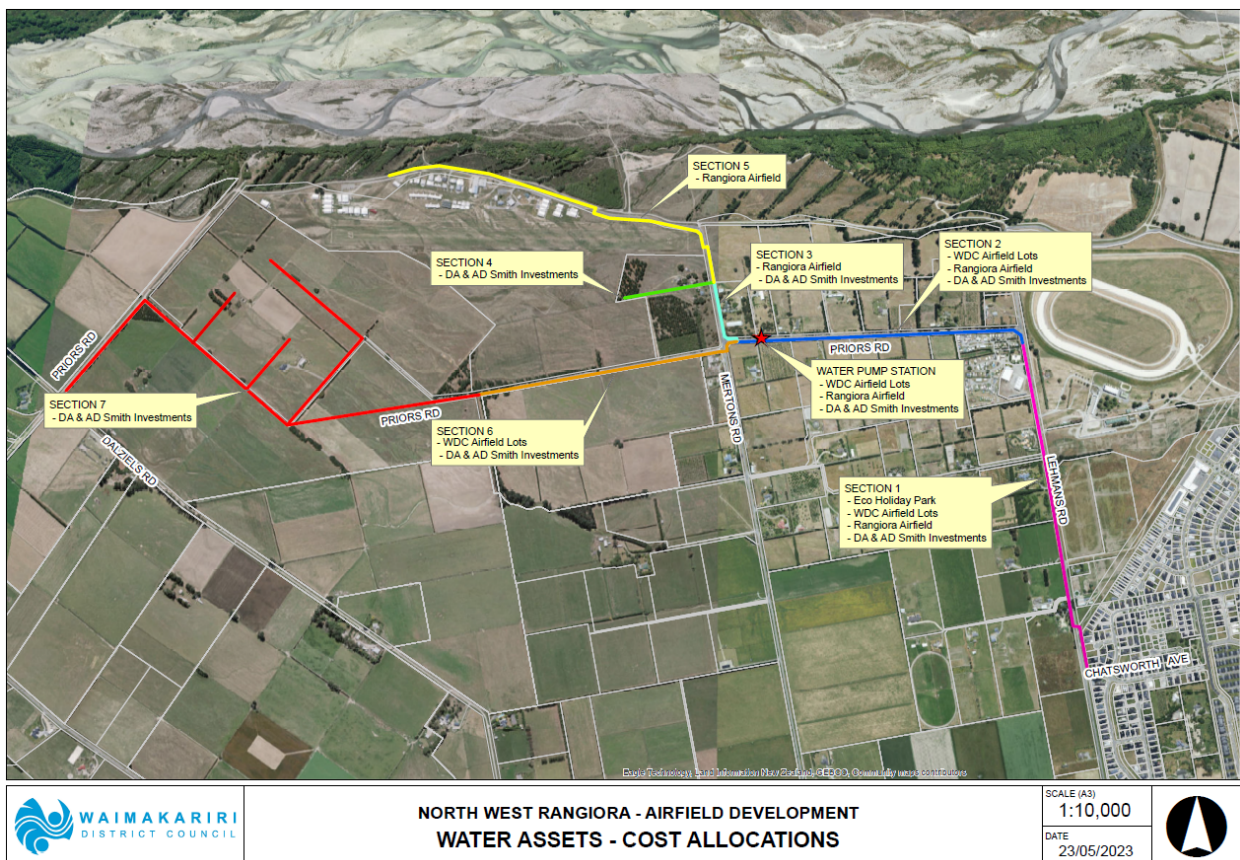
There are four separate entities who will benefit from the installation of the new water reticulation network. These are:

- Eco Holiday Park
- WDC Airfield Development
- Rangiora Airfield
- DA & AD Smith Investment Ltd

It is also proposed that a development to the south of the Rangiora Racecourse, north of Arlington would also be connected. This has been included in the modelling to determine pipe sizing and would ultimately contribute to the scheme through development contributions. However due to the uncertainty of this contribution it is not accounted for in the cost allocation.

Based on the required water demand for each entity, each of these have been modelled to calculate the water flow needed at each site. These water flows are then used to calculate the proportionate split of capital costs to ensure each entity is charged fairly.

The map shown below identifies which of the entities are paying for each section of pipe due to their calculated flow.



Based on each entity paying their fair portion of the capital costs based on flow, the costs are allocated proportionately.

These proportional allocations are detailed in Tables 1 - 8 on the following pages.

Description	Lot Numbers or Ha	Flow per Unit (L/s)	Required Flow (L/s)
Airside Rural Residential - DA & AD Smith Investments	52	0.013	0.676
Commercial - DA & AD Smith Investments	10 Ha	0.407*	4.07
Rural Residential - DA & AD Smith Investments	36	0.013	0.468
WDC Rural Residential	24	0.013	0.312
Rangiora Airfield	10.2 Ha	0.407*	4.15
Eco Holiday Park	1	0.46	0.46
<b>Total</b>			<b>10.136</b>

Table 1 – Baseline - Total flow required for each Entity.

\*Smith Investments commercial area and the Rangiora Airfield have both been modelled as restricted commercial areas with estimated water demand of 0.407L/s/Ha

As the pipe alignment progresses along the route, different entities are charged the capital cost of installing the new pipe (and water booster pump station) based on their usage of the pipe and booster pump station according to proportional flow.

Description	Lot Number or Ha	Flow per Unit (L/s)	Required Flow (L/s)	Percentage of Flow
Airside Rural Residential - DA & AD Smith Investments	52	0.013	0.676	7%
Commercial - DA & AD Smith Investments	10 Ha	0.407	4.07	40%
Rural Residential - DA & AD Smith Investments	36	0.013	0.468	5%
WDC Rural Residential	24	0.013	0.312	3%
Rangiora Airfield	10.2 Ha	0.407	4.15	41%
Eco Holiday Park	1	0.46	0.46	5%
<b>Total</b>			<b>10.136</b>	

Table 2 – Section 1 - Chatsworth Road to Lehmans Rd / Priors Rd Intersection

Description	Rating Units / Ha	Flow per Unit (L/s)	Required Flow (L/s)	Percentage of Flow
Airside Rural Residential - DA & AD Smith Investments	52	0.013	0.676	7%
Commercial - DA & AD Smith Investments	10 Ha	0.407	4.07	42%
Rural Residential - DA & AD Smith Investments	36	0.013	0.468	5%
WDC Rural Residential	24	0.013	0.312	3%
Rangiora Airfield	10.2 Ha	0.407	4.15	43%
Eco Holiday Park	1	0.23		0%
<b>Total</b>			<b>9.676</b>	

Table 3 – Section 2 - Lehmans Rd / Priors Rd Intersection to Priors Rd / Merton's Rd Intersection

Description	Rating Units / Ha	Flow per Unit (L/s)	Required Flow (L/s)	Percentage of Flow
Airside Rural Residential - DA & AD Smith Investments	52	0.013	0	0%
Commercial - DA & AD Smith Investments	10 Ha	0.407	4.07	50%
Rural Residential - DA & AD Smith Investments	36	0.013	0	0%
WDC Rural Residential	24	0.013	0	0%
Rangiora Airfield	10.2 Ha	0.407	4.15	50%
Eco Holiday Park	1	0.23	0	0%
<b>Total</b>			<b>8.22</b>	

Table 4 – Section 3 – Mertons Rd / Priors Rd intersection to Commercial - DA & AD Smith Investments

Description	Rating Units / Ha	Flow per Unit (L/s)	Required Flow (L/s)	Percentage of Flow
Airside Rural Residential - DA & AD Smith Investments	52	0.013	0	0%
Commercial - DA & AD Smith Investments	10 Ha	0.407	4.07	100%
Rural Residential - DA & AD Smith Investments	36	0.013	0	0%
WDC Rural Residential	24	0.013	0	0%
Rangiora Airfield	10.2 Ha	0.407	0	0%
Eco Holiday Park	1	0.23	0	0%
<b>Total</b>			<b>8.22</b>	

Table 5 – Section 4 - Commercial Area DA & AD Investments

Description	Rating Units / Ha	Flow per Unit (L/s)	Required Flow (L/s)	Percentage of Flow
Airside Rural Residential - DA & AD Smith Investments	52	0.013	0	0%
Commercial - DA & AD Smith Investments	10 Ha	0.407	0	0%
Rural Residential - DA & AD Smith Investments	36	0.013	0	0%
WDC Rural Residential	24	0.013	0	0%
Rangiora Airfield	10.2 Ha	0.407	4.15	100%
Eco Holiday Park	1	0.23	0	0%
<b>Total</b>			<b>4.15</b>	

Table 6 - Section 5 – Commercial DA & AD Smith Investments to Airfield

Description	Rating Units / Ha	Flow per Unit (L/s)	Required Flow (L/s)	Percentage of Flow
Airside Rural Residential - DA & AD Smith Investments	52	0.013	0.676	46%
Commercial - DA & AD Smith Investments	10 Ha	0.407		0%
Rural Residential - DA & AD Smith Investments	36	0.013	0.468	32%
WDC Rural Residential	24	0.013	0.312	21%
Rangiora Airfield	10.2 Ha	0.407		0%
Eco Holiday Park	1	0.23		0%
<b>Total</b>			<b>1.456</b>	

Table 7 – Section 6 – Mertons Rd / Priors Rd to WDC Rural residential Lots

Description	Rating Units / Ha	Flow per Unit (L/s)	Required Flow (L/s)	Percentage of Flow
Airside Rural Residential - DA & AD Smith Investments	52	0.013	0.676	59%
Commercial - DA & AD Smith Investments	10 Ha	0.407		0%
Rural Residential - DA & AD Smith Investments	36	0.013	0.468	41%
WDC Rural Residential	24	0.013		0%
Rangiora Airfield	10.2 Ha	0.407		0%
Eco Holiday Park	1	0.23		0%
<b>Total</b>			<b>1.144</b>	

Table 8 – Section 7 – WDC Rural residential Lots to remaining Rural Residential - DA & AD Smith Investments

## 2.2. Water Financial Estimates

Based on Section 1.1 of this memo, proportional allocations are then used to calculate how much of the capital cost of each section of pipe and the water booster pump stations each Entity is to pay.

The updated water financial estimates detailed in Table 9 below are based on the expected installation rates at the assumed time of installation, being June 2022 valuation rates with CPGI increases allowed based on the staged aspect of the overall project. Additionally, 12% professional fees and 40% contingency was also added to the estimates.

Table 9 presents the cost estimate for the preferred Option servicing the DA & AD Smith Investments Development, WDC rural residential development, Rangiora Airfield, and the Eco Holiday Park

Description	Total Capital Cost	Eco Holiday Park	WDC Rural Residential	Rangiora Airfield	DA & AD Smith Investments
<b>Updated Estimate – May 2023</b>	\$2,590,594	\$17,955	\$106,338	\$978,804	\$1,487,498

Table 9: Water cost estimate for preferred option

It is intended that the construction of both the water and wastewater reticulation will be staged over a three year period. The estimated costs of each stage are shown below in Table 10

Description	Stage 1 2023/24	Stage 2 2024/25	Stage 3 2025/26	TOTAL WATER
Holiday Park	\$17,955	\$0	\$0	<b>\$17,955</b>
WDC Airfield Lots	\$10,773	\$33,866	\$61,699	<b>\$106,338</b>
Rangiora Airfield	\$143,637	\$835,167	\$0	<b>\$978,804</b>
DA & AD Smith Investments	\$186,728	\$711,983	\$588,787	<b>\$1,487,498</b>
<b>TOTAL</b>	<b>\$359,092</b>	<b>\$1,581,015</b>	<b>\$650,486</b>	<b>\$2,590,594</b>

Table 10 – Breakdown of costs based on three stage construction.

The full financial break-down is detailed on the following page, refer Table 11. This details the total breakdown of costings, CGPI and cost allocation percentage as detailed in Section 1.1.

## Full Financial breakdown of Preferred Water Option – May 2023

Description	Quantity (m)	Proposed Main Diameter (mm)	Proposed Main Material	June 2022 Rate pipe, Valve and Hydrant	CGPI Increase (%)	Upgrade cost	Professional Fees (12%)	Contingency (40%)	Total Capital Cost	Holiday Park	WDC Airfield Development	Airfield	DA & AD Smith Investments	Holiday Park	WDC Airfield Development	Airfield	DA & AD Smith Proportion
Existing Network to Parrott Rd (Paper Road)	150	200	PE	\$230.00	14.76	\$39,592	\$4,751	\$15,837	\$60,180	5%	3%	40%	52%	\$3,009	\$1,805	\$24,072	\$31,294
Proposed 200mm to 285 Lehmans Road	420	150	PE	\$168.00	14.76	\$80,975	\$9,717	\$32,390	\$123,081	5%	3%	40%	52%	\$6,154	\$3,692	\$49,233	\$64,002
285 Lehmans Road to Intersection Lehmans and Priors	600	150	PE	\$168.00	14.76	\$115,678	\$13,881	\$46,271	\$175,831	5%	3%	40%	52%	\$8,792	\$5,275	\$70,332	\$91,432
Intersection Lehmans and Priors to Intersection Merton and Priors	1000	150	PE	\$168.00	18.42	\$198,946	\$23,873	\$79,578	\$302,397	0%	3%	43%	54%	\$0	\$9,072	\$130,031	\$163,295
Intersection to Commercial Area	170	150	PE	\$179.39	18.42	\$36,114	\$4,334	\$14,445	\$54,893	0%	0%	50%	50%	\$0	\$0	\$27,446	\$27,446
Commercial Area	300	100	PE	\$138.81	18.42	\$49,314	\$5,918	\$19,725	\$74,957	0%	0%	0%	100%	\$0	\$0	\$0	\$74,957
Commercial Area to Airfield	1290	100	PE	\$138.81	18.42	\$212,049	\$25,446	\$84,819	\$322,314	0%	0%	100%	0%	\$0	\$0	\$322,314	\$0
Booster Pumpstation	1			\$460,000.00	18.42	\$543,720	\$65,246	\$217,488	\$826,454	0%	3%	43%	54%	\$0	\$24,794	\$355,375	\$446,285
Intersection to proposed WDC Land Connection	700	50	PE	\$95.00	22.08	\$81,183	\$9,742	\$32,473	\$123,398	0%	50%	0%	50%	\$0	\$61,699	\$0	\$61,699
WDC Land Connection to Remaining Rural Res Lots	2990	50	PE	\$95.00	22.08	\$346,768	\$41,612	\$138,707	\$527,088	0%	0%	0%	100%	\$0	\$0	\$0	\$527,088
<b>TOTAL</b>	<b>7621</b>					<b>\$1,704,338</b>	<b>\$204,521</b>	<b>\$681,735</b>	<b>\$2,590,594</b>					<b>\$17,955</b>	<b>\$106,338</b>	<b>\$978,804</b>	<b>\$1,487,498</b>

Table 11 – Full financial breakdown of preferred water option -May 2023

**STAGE ONE**

**STAGE TWO**

**STAGE THREE**

### 3. Wastewater Servicing

#### 3.1. Wastewater Unit and Cost Allocations

The proposed development is to be serviced with a pressure wastewater network, with pumps on the rural residential and commercial properties designed to discharge into the pressure mains and then discharge into the Rangiora gravity network at Chatsworth Road.

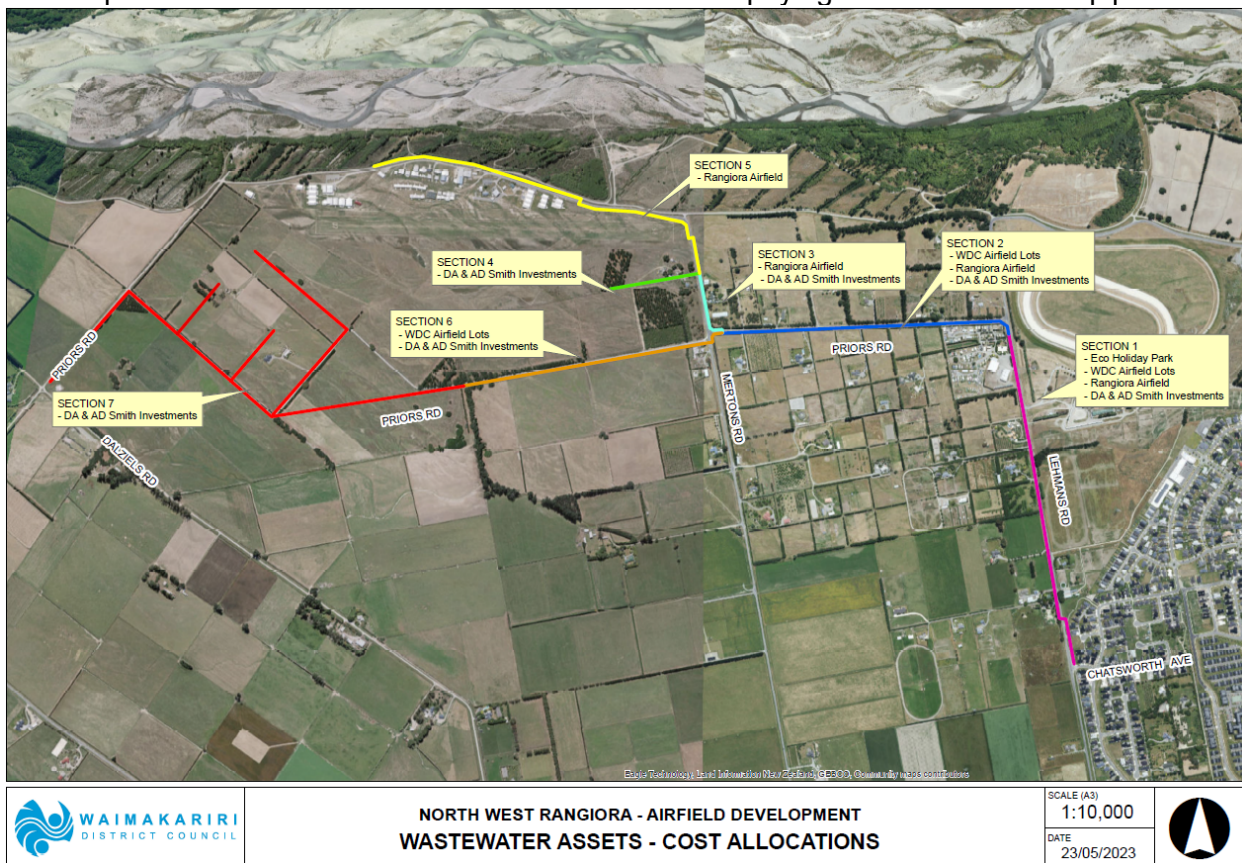
The same four entities detailed in Section 1.1 will also benefit from the installation of the new wastewater reticulation network. These are:

- Eco Holiday Park
- WDC Airfield Development
- Rangiora Airfield
- DA & AD Smith Investment Ltd

Similar to the water allocation, it is also proposed that a development to the south of the Rangiora Racecourse, north of Arlington would also be connected but in this exercise it is assumed the connection will be directly into Chatsworth Road gravity sewer and therefore not allowed for in the capacity calculations of the cost allocations.

The proportional allocation for wastewater is based on the amount of wastewater loading discharged into the reticulated network. These differ from the calculation used in the water percentage allocation due to predicted wastewater loading based on the use of the Lots. These are therefore based on Lots or equivalent Lots discharging wastewater into the reticulated network. Based on the required wastewater discharge loading for each entity, each of these have been modelled to calculate the required pipe sizes along each section with costs allocated due to their calculated wastewater loading into the network

The map shown below identifies which of the entities are paying for each section of pipe.



Based on each entity paying their fair portion of the capital costs based on loading, the costs are allocated proportionately.

These proportional allocations are detailed in the following tables:

Description	Lots / Equivalent Lots
Airside Rural Residential - DA & AD Smith Investments	26
Commercial - DA & AD Smith Investments	25
Rural Residential - DA & AD Smith Investments	18
WDC Rural Residential	12
Rangiora Airfield	25
Eco Holiday Park	30
<b>TOTAL</b>	<b>136</b>

*Table 12 – Baseline - Total wastewater based on Lots / Equivalent Lots for each Entity.*

Description	Lots/equivalent lots	Percentage of Loading
Airside Rural Residential - DA & AD Smith Investments	26	20%
Commercial - DA & AD Smith Investments	25	18%
Rural Residential - DA & AD Smith Investments	18	13%
WDC Rural Residential	12	9%
Rangiora Airfield	25	18%
Eco Holiday Park	30	22%
<b>Total</b>	<b>136</b>	

*Table 13 – Section 1 – Chatsworth Avenue to intersection Lehmans Rd / Priors Rd*

Description	Lots/equivalent lots	Percentage of Loading
Airside Rural Residential - DA & AD Smith Investments	26	25%
Commercial - DA & AD Smith Investments	25	24%
Rural Residential - DA & AD Smith Investments	18	17%
WDC Rural Residential	12	11%
Rangiora Airfield	25	24%
Eco Holiday Park	0	0%
<b>Total</b>	<b>106</b>	

*Table 14 – Section 2 – Intersection Lehmans Rd / Priors Rd to intersection Priors Rd / Mertons Rd*

Description	Lots/equivalent lots	Percentage of Loading
Airside Rural Residential - DA & AD Smith Investments	0	0%
Commercial - DA & AD Smith Investments	25	50%
Rural Residential - DA & AD Smith Investments	0	0%
WDC Rural Residential	0	0%
Rangiora Airfield	25	50%
Eco Holiday Park	0	0%
<b>Total</b>	<b>50</b>	

*Table 15 – Section 3 – Intersection Priors Rd / Mertons Rd to Commercial area DA & AD Smith*

Description	Lots/equivalent lots	Percentage of Loading
Airside Rural Residential - DA & AD Smith Investments	0	0%
Commercial - DA & AD Smith Investments	25	100%
Rural Residential - DA & AD Smith Investments	0	0%
WDC Rural Residential	0	0%
Rangiora Airfield	0	0%
Eco Holiday Park	0	0%
<b>Total</b>	<b>25</b>	

Table 15 – Section 4 – Commercial area DA & AD Smith Investments

Description	Lots/equivalent lots	Percentage of Loading
Airside Rural Residential - DA & AD Smith Investments	0	0%
Commercial - DA & AD Smith Investments	0	0%
Rural Residential - DA & AD Smith Investments	0	0%
WDC Rural Residential	0	0%
Rangiora Airfield	25	100%
Eco Holiday Park	0	0%
<b>Total</b>	<b>25</b>	

Table 16 – Section 5 – Rangiora Airfield

Description	Lots/equivalent lots	Percentage of Loading
Airside Rural Residential - DA & AD Smith Investments	26	47%
Commercial - DA & AD Smith Investments	0	0%
Rural Residential - DA & AD Smith Investments	18	32%
WDC Rural Residential	12	21%
Rangiora Airfield	0	0%
Eco Holiday Park	0	0%
<b>Total</b>	<b>56</b>	

Table 17 – Section 6 – Intersection Priors Rd / Mertons Rd to WDC Airfield Lots

Description	Lots/equivalent lots	Percentage of Loading
Airside Rural Residential - DA & AD Smith Investments	26	59%
Commercial - DA & AD Smith Investments	0	0%
Rural Residential - DA & AD Smith Investments	18	41%
WDC Rural Residential	0	0%
Rangiora Airfield	0	0%
Eco Holiday Park	0	0%
<b>Total</b>	<b>44</b>	

Table 18 – Section 7 – WDC Airfield Lots to remaining rural residential DA & AD Smith Investments



### 3.2. Wastewater Financial Estimates

Based on Section 2.1 of this memo, proportional allocations are then used to calculate how much of the capital cost of each section of wastewater pipe each Entity is to pay.

The updated wastewater financial estimates detailed in Table 19 below are based on the expected installation rates at the assumed time of installation, being June 2022 valuation rates with CGPI increase allowed based on the staged aspect of the overall project. Additionally, 12% professional fees and 40% contingency was also added to the estimates.

Table 19 presents the cost estimate for the preferred Option servicing the DA & AD Smith Investments Development, WDC rural residential development, Rangiora Airfield and the Eco Holiday Park

Description	Total Capital Cost	Eco Holiday Park	WDC Airfield Lots	Rangiora Airfield	DA & AD Smith Investments
<b>Updated Estimate – May 2023</b>	\$1,626,383	\$80,160	\$134,966	\$386,954	\$1,024,303

*Table 19 – Wastewater costs based on the preferred option*

Similar to the water pipelines it is intended that the construction of both the water and wastewater reticulation will be staged over a three year period. The estimated costs of each stage are shown below in Table 20

Description	Stage 1 2023/24	Stage 2 2024/25	Stage 3 2025/26	TOTAL WASTEWATER
Holiday Park	\$80,160	\$0	\$0	<b>\$80,160</b>
WDC Airfield Lots	\$32,793	\$27,484	\$74,689	<b>\$134,966</b>
Rangiora Airfield	\$65,586	\$321,368	\$0	<b>\$386,954</b>
DA & AD Smith Investments	\$185,826	\$236,701	\$601,776	<b>\$1,024,303</b>
<b>TOTAL</b>	<b>\$364,365</b>	<b>\$585,553</b>	<b>\$676,465</b>	<b>\$1,626,383</b>

*Table 20 – Breakdown of costs based on three stage construction.*

The full financial break-down is detailed on the following page, refer Table 21. This details the total breakdown of costings, CGPI and cost allocation percentage as detailed in Section 2.1.

Description	Quantity (m)	Proposed Main Diameter (mm)	Proposed Main Material	June 2022 Rate pipe, Valve and Hydrant	CGPI Increase (%)	Upgrade cost	Professional Fees (12%)	Contingency (40%)	Total Capital Cost	Holiday Park	WDC Airfield Development	Airfield	DA&AD Smith	Holiday Park	WDC Airfield Development	Airfield	DA & AD Smith Proportion
Existing Network to Parrott Rd (Paper Road)	150	100	PE	\$138.81	1.476	\$30,733	\$3,688	\$12,293	\$46,713	22%	9%	18%	51%	\$10,277	\$4,204	\$8,408	\$23,824
Parrot Rd to 285 Lehmans Road	420	100	PE	\$138.81	1.476	\$86,051	\$10,326	\$34,420	\$130,798	22%	9%	18%	51%	\$28,775	\$11,772	\$23,544	\$66,707
285 Lehmans Road to Intersection Lehmans and Priors	600	100	PE	\$138.81	1.476	\$122,930	\$14,752	\$49,172	\$186,854	22%	9%	18%	51%	\$41,108	\$16,817	\$33,634	\$95,295
Intersection Lehmans and Priors to Intersection Merton and Priors	1000	100	PE	\$138.81	1.1842	\$164,379	\$19,725	\$65,752	\$249,856	0%	11%	24%	65%	\$0	\$27,484	\$59,965	\$162,406
Intersection to Commercial Area	170	80	PE	\$115.00	1.1842	\$23,151	\$2,778	\$9,260	\$35,190	0%	0%	50%	50%	\$0	\$0	\$17,595	\$17,595
Commercial Area	300	65	PE	\$105.00	1.1842	\$37,302	\$4,476	\$14,921	\$56,699	0%	0%	0%	100%	\$0	\$0	\$0	\$56,699
Commercial Area to Airfield	1290	65	PE	\$105.00	1.1842	\$160,400	\$19,248	\$64,160	\$243,808	0%	0%	100%	0%	\$0	\$0	\$243,808	\$0
Intersection to proposed WDC Land Connection	700	80	PE	\$115.00	1.2208	\$98,274	\$11,793	\$39,310	\$149,377	0%	50%	0%	50%	\$0	\$74,689	\$0	\$74,689
WDC Land Connection to Remaining Rural Res Lots	2990	50	PE	\$95.00	1.2208	\$346,768	\$41,612	\$138,707	\$527,088	0%	0%	0%	100%	\$0	\$0	\$0	\$527,088
<b>Total</b>	<b>7620</b>					<b>\$1,069,989</b>	<b>\$128,399</b>	<b>\$427,995</b>	<b>\$1,626,383</b>					<b>\$80,160</b>	<b>\$134,966</b>	<b>\$386,954</b>	<b>\$1,024,303</b>

Table 21 – Full financial breakdown of preferred wastewater option – May 2023

**STAGE ONE**

**STAGE TWO**

**STAGE THREE**

#### **4. Accuracy Of Estimates**

There is a lot of uncertainty around inflation and future movement of the CGPI, therefore the figures used for producing these costs estimates are based on known valuation rates at June 2022 with the CGPI cost increase as shown in the calculation tables. These rates are calculated from past and existing contracts that the Waimakariri District Council tenders for water and wastewater projects. Stage 1 works to lay water and wastewater services to the intersection of Lehmans Road and Priors Road will enable more accurate assumptions for Stage 2. Stage 2 and 3 cost estimates which will likely require further adjustments once the true costs of Stage 1 is known.

**Appendix I.**

**Expert Evidence of John  
Aramowicz**

**Before the Hearings Panel  
At Waimakariri District Council**

**Under** Schedule 1 of the Resource Management Act 1991

**In the matter of** the Proposed Waimakariri District Plan

**Between** **Various**

**Submitters**

**And** **Waimakariri District Council**

**Respondent**

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**Statement of evidence of John Aramowicz (Stream 12F Servicing and Hazards)  
on behalf of Waimakariri District Council.**

**Date: 28 May 2024**

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## **INTRODUCTION:**

### **Mr John Thomas Aramowicz (Servicing, Hazards)**

- 1 My full name is John Thomas Aramowicz. I am acting as a consultant engaged to provide technical advice on behalf of the Waimakariri District Council.
- 2 I have prepared this statement of evidence on behalf of the Waimakariri District Council (**District Council**) in respect of technical related matters arising from the submissions and further submissions on the Proposed Waimakariri District Plan (**PDP**).
- 3 Specifically, this statement of evidence relates to civil and geotechnical engineering advice, identifying any significant constraints in relation to the various submissions that seek an alternative zoning to that originally put forward by WDC's Proposed District Plan.
- 4 I am authorised to provide this evidence on behalf of the District Council.

## **QUALIFICATIONS AND EXPERIENCE**

- 5 I am a Chartered Professional Engineer in the practice areas of civil and geotechnical engineering. I gained a Bachelor of Engineering in Mining Engineering from Curtin University in 1994.
- 6 I have over 20 years of experience as a civil and geotechnical engineer in Canterbury where I have consulted on numerous land development projects, insurance claims, and build projects. My main area of technical expertise is the assessment and management of risk from natural hazards, such as flooding, liquefaction, rock fall, land slippage, and subsidence. I also have experience with the design and construction of stormwater, water and wastewater systems in both rural and urban environments.

- 7 I am contracted by the Waimakariri District Council to provide civil and geotechnical engineering advice in relation to the various submissions that seek an alternative zoning to that originally put forward by WDC's Proposed District Plan.
- 8 My brief summary statements are based on information presented in the Applicants Evidence, from mapping information shown on the Waimakariri District Council's 'Waimaps' geographical information system (GIS), and from my discussion with WDC engineers.
- 9 Except where I state I rely on the evidence of another person, I confirm that the issues I have reviewed and any statements that I have made in my summary are within my area of expertise, and I have not omitted to consider material facts known to me that might alter or detract from my expressed opinions.

#### **Code of conduct**

- 10 I have read the Code of Conduct for Expert Witnesses set out in the Environment Court's Practice Note 2023. I have complied with the Code of Conduct in preparing my evidence and will continue to comply with it while giving oral evidence before the Environment Court. My qualifications as an expert are set out above. Except where I state I rely on the evidence of another person, I confirm that the issues addressed in this statement of evidence are within my area of expertise, and I have not omitted to consider material facts known to me that might alter or detract from my expressed opinions.

#### **SUMMARY**

- 11 My name is John Thomas Aramowicz.
- 12 I have been asked by the Council to provide civil and geotechnical engineering evidence in relation to rezoning requests.

## **INVOLVEMENT WITH THE PROPOSED PLAN**

13 I have been involved in the PDP since March 2024.

## **SCOPE OF EVIDENCE**

14 This statement of evidence addresses matters raised by submitters in relation to civil and geotechnical engineering.

## **ASSESSMENT**

15 This statement of evidence addresses matters raised by submitters in relation to civil and geotechnical engineering.

16 I've had a look at the submission (s10) site, which is bounded by Priors Rd in the west, and Merton Rd to the east. I note the submission seeks to have the site rezoned to Special Purpose Zone (SPZ). The proposed scheme plan for the area that was provided to WDC earlier indicates an intention to subdivide a larger area which was to extend to Dalziels Rd in the southwest, and proposed a variety of lot sizes that, in general, would range from around ~0.35Ha to over 2 Ha per lot. The proposed lots will be located to the south of the main west-east airstrip.

17 I have limited my comments to the area of submission 10, being the area between Priors and Merton Roads, shown in grey on the diagram below. I do not comment on the area between Priors and Dalziel Rds.





Figure 1: Waimakariri District Council GIS Mapping

- 18 The aerial photograph of the s10 site that is shown on the WDC GIS indicates there are numerous shallow alluvial channels that drain from the west down to the east across the site. The Ashley River stop bank is located along the northern boundary of the airfield area, shown as a yellow line on the diagram above. There is a community drinking water supply protection zone (CDWSPZ) in the east part of the site.
- 19 In relation to potential natural hazards, the site is located along the true right bank of the Ashley River, but the site is protected by a stop bank. Flood hazard mapping shown in a March 2023 email indicated the southwest parts of the site near Priors Rd were subject to a low flood hazard. However, it appears the current version of flood modelling that is now shown on the WDC GIS for a 200yr ARI event indicates the site generally has a very low flood hazard, except for a narrow area of low flood hazard that is associated with a narrow alluvial channel that meanders from west to east across the mid-part of the site. The 200yr ARI Ashley River break out scenario results in the same low flood hazard as the 200yr local flood scenario. There are no areas of high flood hazard across the site.
- 20 I have briefly reviewed records held on the New Zealand Geotechnical Database that confirm shallow testing was carried out across the site by Kirk Roberts which encountered shallow silts over gravels.

Penetrometer testing indicates the gravels are likely to be medium dense to dense. Given this, the risk of subsidence (which can occur if soft silts, clays, peat or liquefiable soils are present) is unlikely. Given the presence of the stop bank along the true right bank of the Ashley River, erosion and sedimentation in the area of the proposed development are not likely hazards. Given the topography of the site is flat (it is an airfield), land slippage is not a credible hazard. The GNS active faults database indicates there are no known active faults that cross the site.

- 21 I understand from earlier correspondence that the site can be provided with water and wastewater services, albeit that future capital works needed to service existing growth areas may need to be amended to allow for supply/servicing of the submission area. Given the nature of the alluvial geology, I expect stormwater runoff from a future development will be relatively easy to manage using onsite disposing of treated stormwater into ground – the same method of stormwater management that generally used in the northwest and west parts of Rangiora. I note, however, consideration will need to be given to the CDWSPZ and any proposal to dispose of treated surface stormwater runoff into ground within the CDWSPZ will require resource consent from the Regional Council.
- 22 In summary, there are no significant natural or geotechnical hazards that affect the site. Providing a future development is carried out in accordance with the requirements of WDC's Engineering Code of Practice, I consider a future subdivision development of the site is unlikely to cause any significant natural hazards to surrounding properties. Lastly, a future development of the site is capable of being provided with water, wastewater and stormwater services.

**Date:** 28 May 2024