

Before an Independent Hearings Panel
Appointed by Waimakariri District Council

under: the Resource Management Act 1991

in the matter of: Submissions and further submissions on the Proposed
Waimakariri District Plan

and: Hearing Stream 12D: Ōhoka rezoning request

and: **Carter Group Property Limited**
(Submitter 237)

and: **Rolleston Industrial Developments Limited**
(Submitter 160)

Summary of evidence of Paul Farrelly

Dated: 1 July 2024

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SUMMARY OF EVIDENCE OF PAUL FARRELLY

- 1 My full name is Paul Michael Farrelly.
- 2 I prepared the following statements in support of the submitters' rezoning request:
 - 2.1 Statement of evidence dated 5 March 2024; and
 - 2.2 Supplementary statement of evidence dated 13 June 2024.
- 3 The National Policy Statement on Urban Development (*NPS-UD*) requires planning decisions to contribute to well-functioning urban environments. In relation to my area of expertise, the NPS-UD says that a well-functioning urban environment will "support reductions in greenhouse gas emissions (*GHGs*)" – see Policy 1I.
- 4 The key wording in NPS-UD from a GHG perspective is contained in Policy 1 and requires that approval of this rezoning (and therefore the development) "contributes" to well-functioning urban environments, which are urban environments that "support" a reduction in GHGs.
- 5 In this sense, the rezoning should contribute to the ability of Greater Christchurch to support reductions in GHGs.
- 6 It is my opinion that Policy 1(e) does not mandate an absolute reduction in GHG emissions for each development. An absolute reduction would make housing development on any greenfield site nearly impossible without prohibiting private vehicle use.
- 7 In my view, the direction in the NPS-UD does not require a particular proposal to show reductions in GHGs per se, but to contribute to supporting reductions within the wider urban environment by enabling and encouraging people to take positive action in reducing their own GHG emissions. This can be done through ensuring new development is of a form and design which practically takes steps to support people (i.e. residents of the proposed rezoning/development) to make reductions in their overall GHG footprint.
- 8 I consider that the submitters have done all that they practically can to contribute to supporting the reduction of GHGs arising from the development, including:
 - 8.1 Abundant tree planting throughout the Site;
 - 8.2 Prohibition of LPG other than for barbeques,
 - 8.3 Requiring solar generation for residential units;

- 8.4 The provision of off-road pathways throughout the development to support active travel;
 - 8.5 The allowance for a school to be built within the Site;
 - 8.6 The provision of a commercial area within the Site to meet some of the residents' day-to-day needs (reducing travel requirements);
 - 8.7 Provision of a public transport solution; and
 - 8.8 The requirement that dwellings within the development are EV charging ready, to support a faster uptake of EVs within the Site.
- 9 I consider the proposed commercial area, potential school, and public transport would benefit the existing residents of Ōhoka as well, and could potentially reduce their travel-related emissions, thus supporting a reduction in GHG emissions.
- 10 My understanding is that the GHG reference in Policy 1(e) of the NPS-UD aligns with the Climate Change Response (Zero Carbon) Amendment Act 2019, to support achievement of New Zealand's GHG emissions targets through the NPS-UD.
- 11 New Zealand has two key GHG emissions targets, as set in legislation by the Climate Change Response (Zero Carbon) Amendment Act 2019:
- 11.1 reduce net emissions of all GHGs (except biogenic methane) to zero by 2050; and
 - 11.2 reduce emissions of biogenic methane to 24–47 per cent below 2017 levels by 2050, including to 10 per cent below 2017 levels by 2030.
- 12 In this context, I consider that the NPS-UD envisages that a variety of housing types and different price points will be provided in a variety of locations within urban environments by way of intensification of existing urban areas, as well as greenfield development. I note Mr Phillips' supplementary evidence describes the importance of defining the extent of the urban environment in order to apply the provisions above at the right scale, and his view that Greater Christchurch is the applicable urban environment.
- 13 Objective 3 of the NPS-UD seeks that district plans enable more people to live in areas of an urban environment where there is high demand for housing, or for business land in the area, relative to other areas within the urban development (among other criteria). The submitters have produced expert evidence, via Messrs Akehurst, Davidson, Sellars, Jones and Ms Hampson, which

demonstrates there is a high demand for housing centred around Ōhoka relative to other areas in the district.

- 14 In my opinion, Policy 1(e) does not require a comparison of GHG emissions between Ōhoka and alternative locations to be made. However, if a comparison were to be made, I do not consider the appropriate comparator would be development within the three main townships of Rangiora, Kaiapoi, or Woodend/Pegasus. The appropriate comparator in this situation must be with where people would otherwise choose to live if they cannot secure an appropriately sized section in Ōhoka.
- 15 With respect to this point, I understand from the evidence of Mr Jones¹ that buyers preferring Ōhoka who are unable to secure property in this location will:
- 15.1 settle for and purchase a lifestyle block (which most will underutilise) in order to live in the area; or
 - 15.2 opt for alternatives such as Mandeville, Swannanoa, Fernside, Clarkville, Tai Tapu, West Melton, Marshlands or Oruhia which provide a similar offering to Ōhoka.
- 16 Therefore, declining this rezoning request could result in higher GHG emissions as buyers may choose to purchase in locations further from activity centres. It would also likely result in a proliferation of rural lifestyle subdivision in the Ōhoka area. I note that none of these scenarios would necessarily provide the same opportunities to residents to reduce GHG emissions as the proposed rezoning does, as set out in paragraph 8 above.
- 17 I consider the proposed rezoning does contribute to supporting a reduction in GHG emissions under Policy 1(e) of the NPS-UD.

Dated: 1 July 2024

Paul Farrelly

¹ Evidence of Chris Jones dated 5 March 2024, at paragraph 11 and 12.