

OFFICER'S REPORT FOR:

Hearing Commissioners

SUBJECT:

**Proposed Waimakariri District Plan:
Residential Rezonings**

PREPARED BY:

Peter Wilson

REPORT DATED:

22 July 2024

DATE OF HEARING:

19-27 August 2024

Executive Summary

1. This report considers submissions received by the Waimakariri District Council on rezoning requests. The report outlines recommendations in response to the rezoning requests.
2. This report addresses these rezoning requests.
3. I have recommended changes to the Proposed Plan in response to rezoning requests, summarised as follows:
 - The rezoning of a substantial amount of land anticipated for future urban growth within the CRPS and PDP as PDP medium density residential or general residential zone, and consequential changes to the PDP mapping to enable this.
 - The inclusion of additional areas unanticipated for future urban growth as part of these areas above.
 - A recommendation to update the housing bottom lines in the PDP to the latest 2023 housing capacity assessment bottom lines.
4. Having considered all the submissions and reviewed all relevant statutory and non-statutory documents, I recommend that the Proposed Plan should be amended as set out in section Appendix A of this report.
5. For the reasons included throughout this report, I consider that the proposed objectives and provisions, with the recommended amendments, will be the most appropriate means to:
 - 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
 - achieve the relevant objectives of the Proposed Plan, in respect to the proposed provisions.

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Interpretation

6. The report utilises a number of abbreviations for brevity as set out in Table 1 below:

Table 1: Abbreviations

Abbreviation	Means
C/RPS	Operative Canterbury Regional Policy Statement
CDWSPZ	Canterbury Drinking Water Source Protection Zone
District Council	Waimakariri District Council / territorial authority
DLS	Davie Lovell Smith
ECan	Environment Canterbury/Canterbury Regional Council
ENGEO	An engineering consultancy
F(U)DA	Future (urban) development area
FDS	Future development strategy
GCSP	Greater Christchurch Spatial Plan
GHG	Greenhouse Gases
GRZ	General residential zone
IPI	Intensification Planning Instrument
LLRZ	Large Lot Residential Zone
LTP	Long Term Plan (Local Government Act 2002)
MDRS	Medium Density Residential Standards
MDRS	Medium Density Residential Standards (sch 3A, RMA)
MDRZ	Medium Density Residential Zone
NER	North East Rangiora
NES	National Environmental Standard
NESAQ	National Environmental Standards for Air Quality 2004
NESCS	National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health 2011
NESETA	National Environmental Standards for Electricity Transmission Activities 2009
NESF	National Environmental Standards for Freshwater 2020
NESPF	National Environmental Standards for Plantation Forestry 2017
NESSDW	National Environmental Standards for Sources of Drinking Water 2007
NESTF	National Environmental Standards for Telecommunication Facilities 2016
NPS	National Policy Statement
NPSET	National Policy Statement on Electricity Transmission 2008
NPSFM	National Policy Statement for Freshwater Management 2020
NPSHPL	National Policy Statement on Highly Productive Land
NPSREG	National Policy Statement for Renewable Electricity Generation 2011
NPSUD	National Policy Statement on Urban Development 2020
NZCPS	New Zealand Coastal Policy Statement 2010
ODP	Outline Development Plan
Operative Plan	Operative Waimakariri District Plan
PDP	Proposed Plan

Abbreviation	Means
Proposed Plan	Proposed Waimakariri District Plan
PT	Public Transport
REL	Rangiora Eastern Link road/bypass
RLZ	Rural Lifestyle Zone
RMA	Resource Management Act 1991
RMAEHA	RMA Enabling Housing Supply and Other Matters Amendment Act 2021
SARZ	Sport and Recreation Zone
SER	South East Rangiora development area
SMA	Stormwater Management Area
SW	Stormwater
SWMA	Stormwater Management Area
WDDS	Waimakariri District Development Strategy
WW	Wastewater

Table 2: Abbreviations of Submitters' Names

Abbreviation	Means
CCC	Christchurch City Council
CDHB	Christchurch District Health Board
Chorus	Chorus New Zealand Ltd
CIAL	Christchurch International Airport Ltd
Corrections	Ara Poutama Aotearoa the Department of Corrections
DoC	Department of Conservation Te Papa Atawhai
ECan	Environment Canterbury / Canterbury Regional Council
Federated Farmers	Federated Farmers of New Zealand Inc.
FENZ	Fire and Emergency New Zealand
Fish and Game	North Canterbury Fish and Game Council
Forest and Bird	Royal Forest and Bird Protection Society
Heritage NZ	Heritage New Zealand Pouhere Taonga
Hort NZ	Horticulture NZ
Kainga Ora	Kainga Ora - Homes and Communities
KiwiRail	KiwiRail Holdings Limited
Mainpower	Mainpower New Zealand Ltd
MoE	Minister / Ministry of Education
Ngāi Tūāhuriri	Te Ngāi Tūāhuriri Rūnanga
NZDF	New Zealand Defence Force
Police	Minister of Police / NZ Police
QEII Trust	Queen Elizabeth the Second National Trust
Ravenswood	Ravenswood Developments Ltd
Spark	Spark New Zealand Trading Ltd
Tuhaitara Trust	Te Kohaka o Tuhaitara Trust
Transpower	Transpower New Zealand Ltd
Vodafone	Vodafone New Zealand Ltd / One.NZ
WDC	Waimakariri District Council (including as requiring authority)

Abbreviation	Means
Waka Kotahi	Waka Kotahi NZ Transport Agency

In addition, references to submissions includes further submissions, unless otherwise stated.

1 Introduction

1.1 Purpose

7. The purpose of this report is to provide the Hearing Panel with a summary and analysis of rezoning submissions received on the Proposed Plan and to recommend possible amendments to the Proposed Plan.
8. This report is prepared under section 42A of the RMA. It considers rezoning submissions received by the District Council on the Proposed Plan in relation to the relevant strategic directions objectives, objectives, policies, rules, definitions, appendices and maps in the Proposed Plan. The report outlines recommendations in response to the rezoning submissions.
9. The recommendations are informed by both the technical evidence provided by the submitters in support of the rezoning applications, and where undertaken, reviews of this technical evidence. In preparing this report the author has had regard to recommendations made in other related s42A reports.
10. This report is provided to assist the Hearings Panel in their role as 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.
11. The following submissions have been received:
 - 177 original submissions seeking residential rezoning were received. These can be categorised as follows:
 - There were 102 original submissions received from one submitter seeking medium density zonings. Whilst these were analysed as individual submissions, I have treated them as a single submission for the purposes of analysing them.
 - For the rest of the original submissions (75), they fall as follows:
 - Rezoning within and around Rangiora (39)
 - Rezoning within and around Kaiapoi (17)
 - Rezoning within and around Woodend/Rangiora/Pegasus (14)
12. There are 46 further submissions on the above original submissions.

1.2 Author

13. My name is Peter Gordon Wilson. My qualifications and experience are set out in Appendix C of this report.
14. My role in preparing this report is that of an expert planner.
15. I was not involved with the preparation of the Proposed Plan.
16. Although this is a District Council Hearing, I have read the Code of Conduct for Expert Witnesses contained in the Practice Note issued by the Environment Court 2023. 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.

17. The scope of my evidence relates to the Proposed Plan.
18. I confirm that the issues addressed in this statement of evidence are within my area of expertise as an expert policy planner.
19. 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.
20. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

1.3 Supporting Evidence

21. 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:
 - Evidence of submitters, as listed in each specific section
 - Reviews undertaken by Council and other advice commissioned by Council, as listed in each specific section

1.4 Key Issues in Contention

22. I do not consider there to be any key issues in contention, as each rezoning submission is considered on its merits.

1.5 Procedural Matters

Pre-hearing contact, meetings, conferences etc

23. Where I have had pre-hearing discussions and communications with submitters, I have outlined this in the section for that particular rezonings.
24. There has been contact with some submitters, especially those who have asked questions of myself as a reporting officer.
25. I have not made contact with non-submitters who may be affected by this report, however, for each particular rezoning I have made every attempt to identify landowners that may be affected. It is my intention to make these landowners aware of the recommendations in this report and potentially discuss that with them. If matters arise from those discussions with non-submitters, I may raise that at the hearing.

Variation 1 / Intensified Streamlined Planning Process

26. Submissions requesting rezoning under Variation 1 are contained within the separate s42A report on Variation 1 rezonings.

2 Statutory Considerations

2.1 Resource Management Act 1991

27. The Proposed Plan has been prepared in accordance with the RMA, and in particular the requirements of:

- s74 RMA, matters to be considered by territorial authority.
- s75, RMA, contents of district plans.

2.2 Section 32AA

28. I have undertaken a s32AA evaluation of the rezoning recommendations in respect of overall capacity arising from my rezoning recommendations. This is in section 15 in the context of understanding all rezoning requests in the context of others.

2.3 Trade Competition

29. I do not consider trade competition to be a matter raised within submissions and evidence. Consideration of Submissions and Further Submissions

2.4 Background to rezoning requests

30. There are 177 submissions from 55 distinct individual submitters seeking residential rezoning under the Proposed Plan and the Schedule 1, RMA process. Most of these are in the urban or development areas of Rangiora, Kaiapoi, and Woodend/Ravenswood/Pegasus. There are 46 further submissions on these original submissions from 17 distinct individual further submitters.

31. The rezoning requests mainly fall within existing urban areas or future development areas as identified on the PDP planning maps and on Map A of the CRPS, but there are some rezoning requests outside of the Map A areas.

2.5 Overview

2.5.1 Report Structure

32. In accordance with Clause 10(3) of the First Schedule of the RMA, I have undertaken the evaluation firstly on a topic and issues basis. Most submissions focused on topics and issues, rather than specific provisions, however there are some submissions that have sought specific change to notified provision. Where submissions have sought specific changes, I have addressed these in the specific changes section.

33. I consider that this report structure allows the reader to understand the complexities of the medium density housing intensification topic before the specifics of how it is implemented in policy provisions is evaluated.

34. The following evaluation should be read in conjunction with the summaries of submissions and the submissions themselves. Where I agree with the relief sought and the rationale for that relief, I have noted my agreement, and my recommendation is provided in the summary of submission table in Appendix B. Where I have undertaken further evaluation of the relief sought in a submission(s), the evaluation and recommendations are set out in the body of this report. I have provided a marked-up version of the Chapter with recommended amendments in response to submissions as Appendix A.

35. Every submission has received an individual response.
36. This report does not discuss or make recommendations on definitions.

2.5.2 Format for Consideration of Submissions

37. For each identified topic, I have considered the submissions that are seeking changes to the Proposed Plan in the following format:
 - Topics and issues raised by submitters
 - Assessment of provisions and specific matters raised by submitters
 - Recommendations
38. The recommended amendments to the relevant chapter/s are set out in in Appendix A of this report where all text changes are shown in a consolidated manner.
39. I have undertaken a s32AA evaluation in respect to the recommended rezonings in the context of capacity. This takes the form of an analysis of capacity arising from rezoning recommendations.

2.5.3 Potential updates between publication of s42A report and hearing

40. I expect that following the publication of my report, that pre-hearing meetings may occur. Where these occur and where it requires updates to my report, I will present this in my summary at the beginning of the hearing, along with any responses in my Rights of Reply.

2.6 Policy and planning context for rezoning

41. The policy and planning context for rezonings is complex, and I outline my considerations of the higher order documents below, with a recommendation on how to apply them in the context of rezoning applications.

2.6.1 Other policy statements and standards

42. I have reviewed the following environmental standards and policy statements, which I consider relevant or potentially relevant to the specifics of rezoning submissions:
 - National Policy Statement for Freshwater Management (NPSFM)
 - National Policy Statement for greenhouse gas emissions from industrial process heat
 - National Policy Statement for Indigenous Biodiversity
 - National Policy Statement on Electricity Transmission
 - New Zealand Coastal Policy Statement
 - National Environmental Standard for Freshwater

2.6.2 Application of the National Policy Statement for Highly Productive Land (NPSHPL 2020)

43. Under s3.5(7) the NPS-HPL is a relevant matter for consideration if the site subject to the rezoning submission is currently zoned as rural or rural production and is classified as LUC 1, 2 or 3 land, and is not identified for future urban development or subject to a Council initiated or

adopted notified plan change to rezone it from general rural or rural production to urban or rural lifestyle.

44. If the NPSHPL is a relevant matter for consideration, Tier 1 territorial authorities such as the Waimakariri District Council may allow urban rezoning of highly productive land only if the matters specified in section 3.6 are met. In essence, evidence is required that shows the rezoning is needed to provide sufficient development capacity to meet demand for housing or business land to give effect to the NPSUD there are no other reasonably practicable and feasible options for providing that capacity within the same locality and market while achieving a well-functioning urban environment, and the benefits of rezoning outweigh long term costs associated with the loss of highly productive land for land-based primary production.
45. Virtually all of the land subject to these rezoning requests is currently zoned as rural¹ in the Operative District Plan and proposed to be rural lifestyle (RLZ) in the PDP, and as such I consider that the land is exempt under s.3.5(7)(b)(ii) NPSHPL, as the interim HPL status does not apply to rural lifestyle zones.

2.6.3 Application of the National Policy Statement for Urban Development (NPSUD 2020)

46. In addition to the NPSUD objectives and policies I consider that the NPSUD provides direction on the following matters that are of relevance to residential rezoning:
 - Cl 3.2 Providing at least sufficient development capacity in the district to meet expected demand for housing.
 - Cl 3.3 Providing at least sufficient development capacity for business land
 - Cl 3.6 Developing and insertion of housing bottom lines
 - Cl 3.9 monitoring requirements
47. I note, and will discuss below in more detail, that I consider that the NPSUD applies to urban developments in urban environments, and does not necessarily apply to all types of developments. There may be developments in the District where the NPSUD is not a policy consideration, such as:
 - Rural-residential, rural lifestyle, and large-lot residential² developments may be outside of the NPSUD framework if the creation of residential dwellings in these areas maintains or retains rural character.
 - Tourism developments which are not urban or rural in character, but which are bespoke or have their own character.
 - The development of Māori reserves and papakainga within them where this is outside the urban environment.
48. I also note that there is a distinction between the scope of a housing and business capacity assessment or modelling and analysis that contributes to that, and the overall scope of the

¹ The Rural zoning of the operative plan has not been assessed as to its nearest equivalent zone under the National Planning Standards

² Noting that the National Planning Standards do not make a link between residential zones and urban zones, and nor does the CRPS.

NPSUD. Including a matter, or a zone, in a housing and business capacity assessment or monitoring and modelling in the context of that assessment does not automatically mean that matter or zone is necessarily categorised for the other purposes of the NPSUD. An example is large lot residential, where a local authority may choose to assess demand and supply in that area, but by undertaking that assessment, it does not automatically make all or part of that large lot residential zone an urban environment for other purposes of the NPSUD.

What is the urban environment?

49. The question of what is the urban environment in the context of the Waimakariri District has emerged. The NPSUD provides the following definition of urban environment:

urban environment means any area of land (regardless of size, and irrespective of local authority or statistical boundaries) that:

(a) is, or is intended to be, predominantly urban in character; and

(b) is, or is intended to be, part of a housing and labour market of at least 10,000 people

50. Expert planners conferenced on this topic on 26 March 2024. Council also received legal advice from Buddle Findlay on this topic, which is attached in full in Appendix F, but discussed in-line below where particular sections of this advice are relevant:

The first limb of the urban environment definition – urban character

51. Planners tested various approaches to what the first limb of the urban environment may be, with the following positions being recorded:

Tested statement or proposition	Level of agreement
“Land contained within the existing urban areas, greenfield priority areas, future development areas and other areas contained within the projected infrastructure boundary are (or are intended to be) predominantly urban in character”	All experts in agreement
“Additional areas within Greater Christchurch beyond the areas described in (a) above may also be, or intended to be, predominantly urban in character but would be subject to a case-by-case assessment of urban character”	All experts in agreement
“All of Greater Christchurch is, or is intended to be, predominantly urban in character.”	The experts were split on this questions, with roughly 50% considering that Greater Christchurch was intended to be predominantly urban in character, and 50% who considered it was not intended to be predominantly urban in character

52. The planners agree on the first two questions, but disagree on the final question. Council planners Ms Manhire, Ms Milosavljevic, Mr Buckley, Mr Willis, and I stated that Greater Christchurch is not intended to be predominantly urban in character. I remain of the opinion

that Greater Christchurch – whatever it is – is not predominantly urban in character and was not intended to be urban in character.

53. In identifying and narrowing the difference of opinion, all planners agreed the following:

“All experts agree that the term ‘predominantly’ is important to this assessment in the overall context of Greater Christchurch. The difference in expert opinion is primarily related to the degree to which ‘predominantly’ includes rural areas. There are also differing interpretations of what constitutes ‘character’. It can be viewed through different lenses such as landscape, function, use (including existing use), traffic volumes, and economic and social fabric”³.

54. I consider that the “lenses” used for assessment of an urban environment are determinative, and this approach in part may explain the differences and lack of clarity, particularly in the case of Greater Christchurch. I will address this interpretation under “Greater Christchurch” below as I consider it helps to resolve some of the issue.

The second limb

55. Planners tested various approaches to what the second limb of the urban environment definition may be, with the following positions being recorded:

Tested statement or proposition	Level of agreement
(a) The existing urban areas, greenfield priority areas, future development areas and other areas contained within the projected infrastructure boundary.	All experts in agreement
Additional areas within Greater Christchurch beyond the areas described in (a) above (and inclusive of the areas in (a) above).	All experts in agreement
All of Greater Christchurch.	All experts agree that this area is part of the Christchurch labour and housing market.
Areas beyond Greater Christchurch within the district boundaries.	<p>The experts agree that areas beyond Greater Christchurch may be part of the Christchurch labour and housing market, but the connection becomes more tenuous with distance from the city, for example, Oxford, but not Lees Valley.</p> <p>Mr Thomson considers that a different boundary other than the dashed line in Map A would create cross-boundary issues with implications for Christchurch and Selwyn Districts.⁴</p> <p>Ms Manhire, Mr Wilson, Mr Buckley consider that it is the prerogative of the relevant local authority to determine what an urban environment is for the purposes</p>

³ Para 21, https://www.waimakariri.govt.nz/__data/assets/pdf_file/0029/161669/STREAM-12-URBAN-ENVIRONMENT-DAY-1-JWS.pdf

⁴ I address this below in the context of the legal opinion received.

	<p>of applying the NPSUD in planning decisions. Ms Manhire, Mr Wilson, Mr Buckley consider that the outer dashed line on Map A of the CRPS corresponds to the Greater Christchurch 'study area' rather than the 'urban environment'.</p> <p>Mr Clease, Mr Chrystal expressed an initial view but were not party to discussions.</p>
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56. I consider, alongside the other experts, that a large proportion of the housing and labour market catchment for the Christchurch Tier 1 urban environment is within the dashed-line on Map A, CRPS commonly referred to as "Greater Christchurch", but that the outer bounds of the housing and labour market catchment as defined by the NPSUD is beyond this line, perhaps encompassing the entire Waimakariri District, Selwyn District, and Christchurch City.

Other urban environments?

57. I consider that there can be urban environments within the Waimakariri District that are outside of the Tier 1 urban environment for Christchurch, such as Oxford contributing to the Rangiora urban environment (at a Tier 2 or Tier 3 level), and urban environments do not have to be contiguous – they can overlap or have gaps between them⁵.

Interpretation of Policy 8

58. Policy 8 NPSUD has been interpreted by some planners to assume that the urban environment automatically becomes that which is intended by any future development proposal under the policy, regardless of what a local authority may intend the urban environment to be. Council sought legal advice on this aspect, as follows⁶:

- *"If the phrase "urban environments" in policy 8 was read down so that it could only ever apply to areas of land intended by a local authority (but not any other person) to be predominantly urban in character and part of a housing and labour market of at least 10,000 people, then that would significantly reduce the effect of policy 8, because it could only ever apply local authority decisions affecting those areas where local authorities have intended to be predominantly urban in character and part of a housing and labour market of at least 10,000 people as reflecting in RMA planning documents (which is defined to include regional policy statements, regional plans and district plans).*
- *In our view, policy 8 intends that a person other than a local authority (e.g. a developer) can be a plan change proponent or a submitter, and that proponent/submitter can have the opportunity to demonstrate via evidence presented in support of that plan change proposal or submission, their intent that the plan change land area will be predominantly urban in character and part of a housing and labour market of at least 10,000 people, even where urbanisation of that relevant land is not intended (or anticipated) by any local authority in their RMA planning documents (including the CRPS and any district plans). "*

⁵ Para 31-35, Appendix E

⁶ Para 21-22, Appendix E

59. However, I do not consider where an urban environment is, or isn't, to be determinative on application of policy 8, it merely ensures that all unanticipated proposals to create a future urban environment can be considered.
60. The primary test under policy 8 is to ensure that the development proposal provides significant development capacity and contributes to well-functioning urban environments. Objective 1 NPSUD provides a broad definition of what a well-functioning urban environment can include, which may already be given effect to, in whole or part, by the existing lower order policy framework.
61. This leads to a potential solution to the interpretation issue which I will raise now and then discuss again later. If one considers the concept of an *anticipated urban environment* which is that set out in Council planning documents and then an *unanticipated urban environment*, which enables all proposals to be considered under the responsive planning provisions of the NPSUD, including Policy 8, the tension is resolved for the purposes of applying Policy 8. An *unanticipated urban environment* can always be considered under Policy 8. However, the tests in policy 8 are then to consider that how that unanticipated urban environment contributes to well-functioning urban environments, thus requiring a comparison back on the anticipated urban environment, as set out in planning documents.
62. I consider it is important to note that NPSUD Policy 8 is not a rule (such as a rule in a National Environmental Standard). Whilst it may function in this way when an underlying planning framework fails to provide at least sufficient capacity, if lower order plans give effect to this part of the NPSUD by both providing at least sufficient capacity, and have provisions that are responsive to new developments, then the policy pathway leads back to those underlying documents, albeit with some additional flexibility overriding any prohibitive or avoid directives within them.
63. I also consider that the NPSUD and Policy 8 in particular were intended to provide a circuit-breaker on plan frameworks that had failed to anticipate future growth and provide for it. Policy 8 also does not compel Councils to grant such a plan change or an application, it just requires Councils to be responsive towards it. I find the following common English definition of responsive to be helpful:
- Responsive - reacting or replying quickly or favourably, as to a suggestion, initiative, etc⁷*
64. Responsiveness is more than dismissing or failing to consider a proposal on the grounds it is unanticipated. However, it is also not the same as automatically approving something.
65. I am conscious that Policy 8 may have been intended primarily to handle singular development applications, outside of a district plan (or other review), in areas that did not have a policy framework that provided for growth and development. Greater Christchurch has had a framework providing for growth and development since the Canterbury earthquakes, and as such, I consider the application of Policy 8 may be more limited in the Greater Christchurch context, insofar as the CRPS has anticipated and provided for growth.
66. In this regard I do not consider that overzoning land achieves a well-functioning urban environment, particularly in that over zoned land that sits vacant prevents its use – and particularly long term investment – in rural production or other uses. Overzoning land can lead

⁷[https://www.collinsdictionary.com/dictionary/english/responsive#:~:text=\(r%C9%AAsp%C9%92ns%C9%AAv%20\),such%20as%20pleasure%20and%20affection.](https://www.collinsdictionary.com/dictionary/english/responsive#:~:text=(r%C9%AAsp%C9%92ns%C9%AAv%20),such%20as%20pleasure%20and%20affection.)

to fragmented urban form, inefficient design and delivery of infrastructure, uncertainty over where to site and locate community facilities and schools, and the risk of land-banking.

67. It cannot have been intended for the responsive planning provisions to be a never-ending gateway potentially resulting in the substantial over zoning of land. This in turn requires a consideration of the degree to which lower order planning documents give effect to the NPSUD.

NPSUD Objective 6

68. I am conscious of NPSUD Objective 6, which I consider is the overriding directive on responsiveness in the context of the NPSUD:

Objective 6: Local authority decisions on urban development that affect urban environments are:

(a) integrated with infrastructure planning and funding decisions; and

(b) strategic over the medium term and long term; and

(c) responsive, particularly in relation to proposals that would supply significant development capacity.

69. Policy 8 implements this objective in the context of plan changes. However, I consider that the objective has a wider scope in relation to urban environments, as it applies the responsiveness directive to all urban development proposals, not just those that would supply significant development capacity. It also requires integration with infrastructure planning and funding, and strategic decision making over the medium and long-term.

70. I consider that objective 6 is helpful in understanding that:

- Policy 8 still requires integration of urban development proposals with infrastructure planning and funding, and strategic considerations, as well as the well-functioning urban environment test.
- The test of “significant development capacity” is contextual, and the objectives of the NPSUD assist in defining the context.
- There are limits on the application of the NPSUD, as it applies to urban developments only. Non-urban developments are not within scope of the NPSUD, however I understand that making this distinction is highly contextual and merits-based, and whatever pathway is applied, it may not be determinative on any final recommendation on a proposal.

2.6.4 Application of the Canterbury Regional Policy Statement

Implementation of the NPSUD

71. In assessing the CRPS, I consider the degree to which it gives effect to the NPSUD. I am also conscious of the interpretation requirements of King Salmon⁸, particularly⁹:

⁸ Royal Forest and Bird Protection Society of New Zealand Inc v Bay of Plenty Regional Council [2017] NZHC 3080

⁹ The follow interpretation approach provided by BF at para 48-

- The phrase "give effect to", means "implement" which is a "strong directive, creating a firm obligation of the part of those subject to it".¹⁰
- However, what is required to implement a directive, in an NPS or the CRPS, will be "affected by what it relates to, that is, what must be given effect to."¹¹
- A requirement to give effect to a policy which is framed in a specific and unqualified way may, in a practical sense, be more prescriptive than a requirement to give effect to a policy that is worded at a high level of abstraction.¹² The language of policies is "significant, particularly in determining how directive they are intended to be and thus how much or how little flexibility a sub-ordinate decision-maker might have."¹³
- Where an apparent conflict between particular policies exists, decision-makers should first "make a thoroughgoing attempt to find a way to reconcile them".¹⁴ Paying "close attention" to the wording of policies may mean an apparent conflict dissolves.¹⁵

72. I am also conscious of the statement of the expert planners, which I consider encapsulates and is consistent with the legal advice above as follows:

*The experts consider that both the NPSUD and CRPS apply. Where the CRPS covers a matter that the NPSUD also covers there may be no need to have recourse to the NPSUD, but where the CRPS does not give full effect to the NPSUD, then the NPSUD provisions should be given more weight*¹⁶.

73. Council's legal advice further outlines the following¹⁷:

- The CRPS *does not* contain a definition of urban environment, therefore there is no inconsistency with the NPSUD on this matter.
- The phrases "Greater Christchurch urban environment", "Greater Christchurch Tier 1 urban environment" are used in Chapter 6 of the RPS and are *relevant for the purposes of Objective 6.2.1(a)*.
- Objective 6.2.1(a) was inserted by s55 RMA changes under cl 3.6(4) of the NPSUD as part of the insertion of housing bottom lines.
- There is uncertainty and ambiguity about what line (if any) on Map A refers to an urban environment for Greater Christchurch, leaving room for differences of opinion. There is no indication in those phrases, that they represent, relate to, account for, or otherwise have regard to, the elements of what constitutes an "urban environment" under the NPS-

¹⁰ Environmental Defence Society Inc v New Zealand King Salmon Company Ltd [2014] NZSC 38; 1 NZLR 593 at [77].

¹¹ Ibid, and affirmed in Royal Forest and Bird Protection Society of New Zealand Inc v Bay of Plenty Regional Council [2017] NZHC 3080 at [49].

¹² Environmental Defence Society Inc v New Zealand King Salmon Company Ltd [2014] NZSC 38; 1 NZLR 593 at [75]-[80].

¹³ Port Otago Limited v Environmental Defence Society [2023] NZSC 112 at [61].

¹⁴ Ibid at [131].

¹⁵ Royal Forest and Bird Protection Society of New Zealand Inc v New Zealand Transport Agency [2024] NZSC 26 at [203]. ³⁰ As the s42A officers position paper for planning conferencing identifies the CRPS does define "urban activities" and urban (see page 19-20 of JWS – Day 1).

¹⁶ Para 16, https://www.waimakariri.govt.nz/__data/assets/pdf_file/0021/161670/STREAM-12-URBAN-GROWTH-and-DEVELOPMENT-JWS-DAY-2-.pdf

¹⁷ Paras 51-58, Appendix F

UD as discussed above. Amongst other things, there is no indication that Map A shows an area that is, or is intended to be "*part of a housing and labour market of at least 10,000 people*", nor a complete identification of an area that is, or is intended to be, "*predominantly urban in character*".

- Because the CRPS does not contain a definition of urban environment, there is no conflict with it in the context of the NPSUD definition.

74. As with the legal advice, I also consider that the status of the area within the dashed-line on Map A, CRPS is unclear. Some planners refer to the area within the dashed-line as 'Greater Christchurch', but as I have stated above, there are two competing definitions in the CRPS on what Greater Christchurch is¹⁸:

- One definition refers to it as the "area within Map A";
- Another definition refers to it as all of the Districts.

75. Map A itself has no legend item stating what the dashed-line is, however, it could be inferred from the Greater Christchurch Spatial Plan (see below) that this is 'Greater Christchurch'.

76. But I consider that this area definition is problematic, as for the reasons outlined above, I do not consider that the area within the dashed-line can refer to all of the Tier 1 Christchurch urban environment anyway, if the housing and labour market catchments now extend beyond the dashed-line, as discussed within the 2021 HCA. I understand that the origins of the dashed-line in Map A may be for transport planning purposes¹⁹, and may have once captured a majority of commuters to Christchurch.

77. Regardless of the status of the area within the dashed-line, which should be clarified, I consider that the land within this area is clearly not all 'intended to be' predominantly urban in character as the CRPS. I make the following specific points in this regard:

- The CRPS requires urban activities to be located within the existing urban areas, greenfield priority areas and FDAs shown on Map A. The CRPS is highly directive in this regard, with framework objective 6.2.1(7) requiring the maintenance of character and amenity of rural areas and settlements, and Policy 6.3.1 explicitly allowing development only in accordance with the shaded areas in Map A. Some of these areas were added by Change 1 (2021) to the RPS in response to the housing capacity assessment and the need to identify areas intended for long term growth.
- The CRPS has restrictions on rural residential development in the rural areas of Greater Christchurch in Policy 6.3.9.
- The Greater Christchurch Spatial Plan identifies areas intended for growth, and does not show all of the Map A area as urban. It remains as rural.

¹⁸ The CRPS has two inconsistent definitions for Greater Christchurch, see pg 243 & pg 250, <https://api.ecan.govt.nz/TrimPublicAPI/documents/download/4218008>. The 2011 Act definition of Greater Christchurch was all of the Districts, with the 2016 Act redefining it as a series of towns defined by meshblocks, and roughly defined by the dashed-line now in Map A, but not in absence of the meshblock definition. Both Acts are now repealed.

- The Greater Christchurch Spatial Plan also states that highly productive land between towns is to be protected for food and fibre production²⁰.
- The CRPS has other policies, such as its review policy 6.3.11(5)(g) which identifies how, in the event of changes to the intended settlement pattern in Map A, “sufficient rural land is retained to maintain the open space landscape character either between or surrounding the areas of urban activity within Greater Christchurch”.

Urban character

78. My assessment of the current character of this area is informed by the 2018 Boffa Miskell Rural Character Assessment (which informed the Proposed Plan) which assessed rural character within the entire Waimakariri District, including the District’s area within the dashed-line of Map A. It did not conclude that the whole of the area within the dashed-line of Map A is predominantly urban in character. Rather it identified areas of urban character and areas of rural character and indicated that the rural areas were not uniform, with different areas identified such as Coastal Plains, Lower Plains and Waimakariri River Plains (see Figure 1 below).

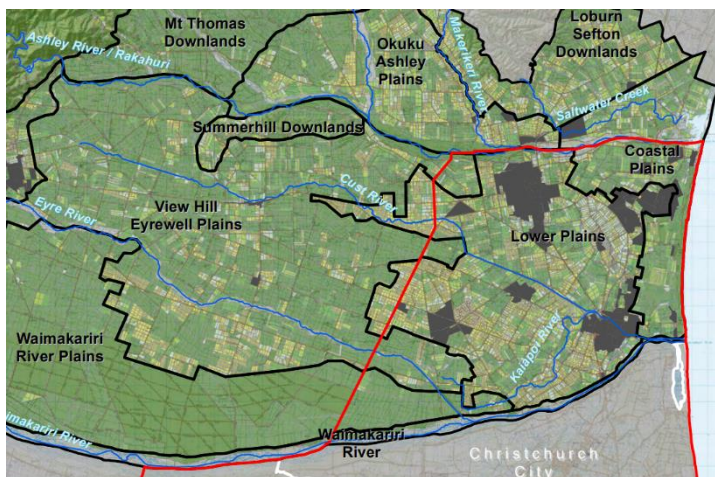


Figure 1: Rural Character Areas (2018 Boffa Miskell Rural Character Assessment)

79. Change 1 to the CRPS was the last significant update to Map A, but I am not aware of any urban character assessment that occurred at that time. Change 1 primarily introduced additional future development areas into Map A, as an extension of existing urban areas.

The consideration of capacity

80. The CRPS was an early adopter of identifying and providing for areas for long term growth, primarily in the context of earthquake recovery. This approach has continued, particularly with Change 1 which identified further areas for growth in response to updated capacity assessments. These are the shaded areas in Map A.

81. The CRPS also contains provisions that can be applied in the event that there are capacity shortfalls, particularly policy 6.3.11. The clauses in this policy are primarily directed at regional council initiated reviews.

82. I consider this important, as if a provision that implements a higher-order policy, such as the NPSUD requirements in Objective 6 and Policy 8 to be responsive to unplanned or out of

²⁰ NPSHPL cl 3.4 pg 24 and 58; and cl 5.4 pg 25

sequence development proposals, is already implemented by a lower order document, there may be no recourse to the higher order document. In the event of a capacity shortfall, or a consideration of an out-of-sequence development proposal in the context of a district plan review, the CRPS provisions may be sufficient to consider and be responsive to it, but only in the context of the Canterbury Regional Council doing the review itself.

83. I am also conscious of the NPSUD requirements to provide “at least sufficient’ development capacity. Whilst the NPSUD does not fully define what ‘at least sufficient’ is, the plain English meaning of it is as follows:

- *Sufficient* – “enough to meet a need or purpose”²¹
- *Least* – “smallest in size, amount, degree, etc.; slightest”²²

84. I consider that this means to provide additional development capacity, over and above the bare minimum, but only the amount required to meet a need or a purpose. It is not to provide endless development capacity, as I am conscious that Objective 1 NPSUD in particular, which defines a well-functioning urban environment would not be met by rezoning every parcel of land that applied the responsive planning test. Urban development, enabled by residential rezoning, must still occur as part of strategic medium and long-term planning by local authorities, in order for that urban development to be a well-functioning urban environment. Examples include integration with transport, and mitigation of natural hazards. I do not consider that the overzoning of land, ahead of transport or servicing systems, meets the definition of well-functioning urban environment in Objective 1.

85. Clauses 3.2 and 3.3 of the NPSUD provide some guidance regarding what ‘sufficient’ means:

- In order to be sufficient, development capacity must be plan-enabled, infrastructure-ready, feasible, and reasonably expected to be realised, and for Councils to include the appropriate competitiveness margin.

86. I note that the principal reasons for adopting CRPS Objective 6.2.1(a) defines “at least sufficient development capacity” as including the competitiveness margin of 20% for the short-medium term, and 15% for the long term.

87. I consider that the CRPS has defined “at least sufficient development capacity” for the purposes of the PDP, however, I still consider that this needs to be tested against the specifics of the urban housing market for the Waimakariri District.

88. Another approach to assessing what “at least sufficient” means is to look at the responsiveness direction in the NPSUD, and interpret it in that light. In this sense, “at least sufficient” may mean not to disregard something solely on the basis that the sub-region or district already has capacity. The development proposal must still be considered.

Specific policy requirements of the CRPS

89. I consider that Chapter 6, CRPS sets out the growth and settlement pattern and provisions for Greater Christchurch. It is directive on where growth is to occur, identifying the specific shaded areas in Map A of greenfield priority areas and future urban development areas, where capacity exists and where growth is to be located. In particular:

²¹ <https://www.dictionary.com/browse/sufficient>

²² <https://www.dictionary.com/browse/least>

- Objective 6.2.1, and Map A – the overall framework objective for Chapter 6, including the identification of priority areas for urban development, avoidance of urban development outside of existing urban areas or greenfield priority areas, unless expressly provided for by the CRPS, maintenance of character and amenity of rural areas and settlements, providing for development opportunities on Māori reserves.
- Objective 6.2.1(a) defining what “at least sufficient” development capacity for housing bottom lines for Waimakariri District Council. I note that “at least sufficient development capacity” is defined as inclusive of the competitiveness margin of 20% for the short-medium term, and 15% for the long term.
- Objective 6.2.2 – urban form and settlement pattern, providing for intensification targets, a range of housing types, identifying greenfield priority areas, future development areas, and sustainable and self-sufficient growth of the towns of Rangiora, Kaiapoi, Woodend, managing rural residential development outside of existing urban and priority areas, providing for development on Māori reserves.
- Objective 6.2.3 – sustainability, requiring quality living environments that incorporate good urban design, the retention of identified areas of special amenity and historic heritage value, retention of values important to tangata whenua, providing a range or densities and uses, and is healthy, environmentally sustainable, functionally efficient, and prosperous.
- Objective 6.2.4 – integration of transport infrastructure and land use, requiring the prioritisation of transport infrastructure to integrate with priority areas and new settlement patterns to, manage network congestion, reduce dependency on private motor vehicles, reduce the emissions of contaminants to air and energy use, promote the use of active and public transport modes, optimise the use of existing capacity within the network, and enhance transport safety
- Objective 6.2.5 – key activity and other centres, support and maintain the network of centres as the focal points for commercial, community, and service activities during the recovery period. The centres are, the central city, key activity centres (as set out in Map A), neighbourhood centres.
- Policy 6.3.1 – give effect to the urban form identified in Map A, identifying the location and future extent of urban development, give effect to urban form in Map A for location and extent of key activity centres, new urban activities only occur within existing urban areas, identified greenfield priority areas, unless otherwise explicitly provided for, avoid development that adversely affects the function and viability of, or public investment in the Central City and Key Activity Centres.
- Under Policy 6.3.1 I note a method for Canterbury Regional Council that consents that are outside of existing urban areas or greenfield priority areas are to be considered for deferral under s91 RMA where other consents are required from another local authority so that they can be considered together, and enabling Map A to be changed where monitoring indicates a need for new greenfield priority areas.
- Policy 6.3.2 development form and urban design, including turangawaewae, the sense of place and belonging, historic heritage, character and quality of the existing built and natural environment, connectivity, including the provision of multimodal connections

within a development, safety, choice and diversity (including , environmentally sustainable design, creativity and innovation.

- I note the Policy 6.3.2 principal reasons and explanation, mention that addressing the matters listed will assist with reducing crime, reduce travel times, fuel usage and therefore greenhouse gas emissions, and dependence on private motor vehicles, provide for a high standard of physical amenities, minimise adverse effects on other areas such as flooding, traffic congestion and degraded water, protect important features of the natural environment, provide protection of historic heritage from inappropriate development, and enhance its values, improve the mental and physical wellbeing of its residents, create efficient development patterns.
- Policy 6.3.3 development in accordance with outline development plans, and specific requirements of outline development plans.
- Policy 6.3.4 transport effectiveness, avoiding development that will overload strategic freight routes, providing patterns of development that optimise use of existing network capacity, ensuring uptake of active and public transport and opportunities for modal choice in new developments, opportunities for travel demand management, integrated transport assessments for substantial developments, improving road user safety.
- Policy 6.3.5 integration of land use and infrastructure, identifying priority areas for development and future development areas to enable reliable forward planning for infrastructure development and delivery, airport noise contours.
- Policy 6.3.6 business land of less relevance in this consideration, except insofar as residential developments include neighbourhood centre zones and any potential for business land where residential zoning is not appropriate.
- Policy 6.3.7 residential location, yield, and intensification, requiring subject to 6.3.5 and 6.3.12, residential greenfield development to occur in accordance with Map A, intensification to focus on the central city and key activity centres, neighbourhood activity centres commensurate with their scale and function, core public transport routes, mixed-use areas, and on suitable brownfield land, targets for residential yield in various areas, addressing housing affordability.
- Policy 6.3.9 rural residential development, outlining that it must occur in accordance with a rural residential development strategy, specific location and design requirements, and a condition that rural residential development shall not be regarded as in transition to full urban development.
- Policy 6.3.10 Māori reserves, providing for Māori reserves to be used for their intended purpose.
- Policy 6.3.11 Monitoring and review, enabling the Canterbury Regional Council in conjunction with local authorities to monitor and review the available supply of residential and business land to meet the objectives and policies of the NPSUD. This includes responding to shortfalls, altered circumstances, new housing and business capacity assessments. This policy identifies how a review of the extent and location of land for development, alteration to greenfield priority areas, future development areas, or provision of new greenfield priority areas should occur, which includes the requirement

for infrastructure to be in place or able to be economically and efficiently provided to support that activity, provision in place for safe, convenient and sustainable access to community, social, and commercial facilities, urban consolidation to continue to be achieved, sufficient rural land to be retained to maintain the open space landscape character either between or surrounding the areas of urban activity within Greater Christchurch.

- The methods that implement Policy 6.3.11 is an RPS change following a review under 6.3.11.
- Policy 6.3.12, specific requirements for enabling development within identified future development areas.

90. Other sections of the CRPS that may be relevant to the particular rezoning requests I have assessed include:

- Chapter 5, CRPS is similarly directive, but in the overall Canterbury region, outside of the dashed-line in Map A.
- Chapter 9, ecosystems and indigenous biodiversity. Where these issues arise in the context of a rezoning request, I consider the PDP provisions as the most up to date set of provisions that give effect to the NPSIB for instance.
- Chapter 11, natural hazards, which has been considered in hearing stream 3. In the context of natural hazards, I consider Mr Willis’s s42A recommendations on district-wide provisions that give effect to the CPRS, rather than directly to the CRPS itself, to avoid potential inconsistencies.
- Chapter 17, contaminated land. I consider that this is often more of a matter for subdivision consents, but it may appear in evidence presented by submitters, often informed by the Canterbury Regional Council’s public database of potentially contaminated sites²³.

2.6.5 How does the CRPS give effect to the NPSUD

91. In the event that the responsive planning provisions of the NPSUD apply, particularly Objective 6 and Policy 8, I consider that the CRPS may already implement aspects of the NPSUD, particularly the NPSUD Policy 1 statements that define “at a minimum”, what a well-functioning urban environment is.

92. I have considered the degree to which the CRPS gives effect to the NPSUD objectives and policies for the purposes of understanding the weighting in which to give them in any assessment.

93. I have assessed the CRPS objectives and policies against the NPSUD and make the following comments in regard to how they implement the NPSUD:

Table 3 Consistency between the NPSUD and CRPS

NPSUD Provision	CRPS consideration
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²³ <https://llur.ecan.govt.nz/home>

<p>Objective 1: <i>New Zealand has 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.</i></p>	<p>I consider that a well-functioning urban environment must be assessed broadly on these aspects, and this would thus enable a broad assessment against how the CRPS provisions set out what a well-functioning urban environment is.</p>
<p>Objective 2: <i>Planning decisions improve housing affordability by supporting competitive land and development markets.</i></p>	<p>I consider this provides guidance on how to interpret housing affordability in the context of how it may appear in various CRPS provisions, by defining it as ensuring the sufficient release of land to enable a competitive land and development market, rather than defining it as a responsibility to specifically provide a certain number of home at a certain price to match a certain income level, as this would be beyond the capacity of local government to reasonably achieve.</p>
<p>Objective 3: <i>Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:</i> <i>(a) the area is in or near a centre zone or other area with many employment opportunities</i> <i>(b) the area is well-served by existing or planned public transport</i> <i>(c) there is high demand for housing or for business land in the area, relative to other areas within the urban environment.</i></p>	<p>I consider that the CRPS provisions implement this in the context of the Waimakariri District, by applying key activity centres, ensuring linkages with existing or planned public transport. In respect of demand, I consider that Map A assumed that demand for housing was likely to be higher in existing urban areas (than relative to other areas), and thus provided future growth adjacent to towns in Greater Christchurch.</p>
<p>Objective 4: <i>New Zealand’s urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations</i></p>	<p>I consider that this means that there can be an expectation of change within an urban environment, and that CRPS objectives and policies must be interpreted in a responsive fashion in respect of amenity.</p>
<p>Objective 5: <i>Planning decisions relating to urban environments, and FDSs, take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).</i></p>	<p>I consider that this implements the RMA s8 requirements, which are also a requirement anyway of the CRPS provisions in absence of any national policy.</p>
<p>Objective 6: <i>Local authority decisions on urban development that affect urban environments are:</i> <i>(a) integrated with infrastructure planning and funding decisions; and</i> <i>(b) strategic over the medium term and long term; and</i></p>	<p>I consider that this requires a responsive assessment of any proposal against how the CRPS requires infrastructure to be provided for and planned in respect of Greater Christchurch. It also requires the assessment of strategic provisions within the CRPS, such as Map A, and Objective 6.2.1, which set out the</p>

<i>(c) responsive, particularly in relation to proposals that would supply significant development capacity.</i>	purposes of establishing a settlement pattern for Greater Christchurch.
<i>Objective 7: Local authorities have robust and frequently updated information about their urban environments and use it to inform planning decisions.</i>	The CRPS provides housing bottom lines in Objective 6.2.1(a) which are updated under s55 RMA changes every three years, in response to demand and supply modelling.
<i>Objective 8: New Zealand’s urban environments: support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change</i>	The CRPS has sustainability provisions which contain similar requirements for assessment
Policy 1 – well-functioning urban environments	<p>I consider that the CRPS provisions implement this in full, by describing the requirements of a well-functioning urban environment in Greater Christchurch.</p> <p>I note that the Policy 1 criteria is of the form of guidance, rather than specific or directive. This can enable the interpretation approach of similar or more specific provisions that are found in a lower order document, such as the CRPS, to be considered to implement them where they cover the same concepts and ground without needing reference to the higher order documents.</p>
Policy 2 – at-least sufficient development capacity	<p>I consider that the CRPS Objective 6.2.1(a) defines “at least sufficient capacity” in the context of Greater Christchurch, also by breaking this down to the granular level of the three districts. “At least sufficient development capacity” is defined as targets for the medium term supply of residential housing that are to be achieved by 2031, and the long term, by 2051.</p> <p>There is a 30-year total covering the period from 2021 to 2051</p>
Policy 3 – intensification	This primarily relates to zones for centres, rather than general residential zones, but I consider that CRPS Policy 6.3.7 provides guidance in respect of where and how to achieve higher densities.
Policy 4 – incorporation of qualifying matters	The CRPS does not provide provisions on how to implement qualifying matters in respect of Greater Christchurch. The RMAEHA and MDRS have largely overridden the CRPS in this regard and I do not consider the lack of provisions for qualifying matters in the CRPS are not of consequence.

<p>Policy 5 – heights and densities</p>	<p>This applies to tier 2 and 3 urban environments. The CPRS guidance on heights and densities applies to all urban environments within Greater Christchurch, and does not specifically distinguish based on tiers.</p>
<p>Policy 6 – <i>making decisions on urban environments, to have particular regard to:</i></p> <ul style="list-style-type: none"> • <i>Planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement.</i> • <i>The planned urban built form in those RMA planning documents may involve significant changes to an area</i> • <i>The benefits of urban development that are consistent with well-functioning urban environments (as described in policy 1)</i> • <i>Relevant contribution to meeting the requirements of this National Policy Statement to provide or realise development capacity</i> • <i>Likely current and future effects of climate change.</i> 	<p>I consider this gives substantial weight to the concept of a planned urban environment, or as I describe it, an <i>anticipated</i> urban environment, including where that planned or anticipated urban environment may create conflict with the existing urban environment.</p> <p>I consider that the CRPS provisions set out what the planned urban environment is for Greater Christchurch, noting that I do not consider that the CRPS explicitly defines what an urban environment is.</p>
<p>Policy 7 – housing bottom lines</p>	<p>I consider that the CRPS implements this in full as based on the 2021 housing capacity assessment, noting that s55 RMA changes may update this to the 2023 assessment at some point.</p>
<p>Policy 8 – responsiveness</p>	<p>I consider that the CRPS mostly implements this in the context of where it sets out the planned or anticipated urban areas to be. It does not implement it in the context of proposals to go beyond the planned urban areas in Map A, however, it does provide a framework for assessing such proposals. However, the CRPS in the absence of NPSUD Policy 8 prevents such proposals from being approved, except by RPS change.</p>
<p>Policy 9 – <i>Te Tiriti O Waitangi / Treaty of Waitangi in relation to local environments</i></p>	<p>I do not consider this of significant relevance for this assessment as I am assessing the CRPS against the NPSUD here, not the particular arrangements that are in place or might be in place in the future between iwi and manawhenua and the Waimakariri District Council, including those that might be found in the PDP. These arrangements would apply</p>

	regardless of any assessment of a policy hierarchy.
Policy 10 – shared jurisdiction	Through the framework of Chapter 6, which applies to Greater Christchurch, I consider that the CRPS gives effect and implements the shared jurisdiction requirements of the NPSUD.
Policy 11 – car parking	The CRPS does not provide guidance or direction on this aspect of the NPSUD, and thus does not implement it (and it may also not be a s30 RMA requirement of the regional council to implement this), however I consider that the PDP does fully implement this aspect of the NPSUD (as a s31 RMA district council function).

2.6.6 Summary policies in the CRPS

94. I consider that the CPRS contains two particular policies that summarise the overall Chapter 6 framework. They are:
- Policy 6.3.11 which sets out the circumstances for commencing any plan changes resulting from reviews of the extent and location of land for development outside of the shaded areas in Map A; and
 - Policy 6.3.12, which sets out the requirements for enabling rezoning of land within FDAs.
95. I consider that Policy 6.3.11, particularly 6.3.11(5) provides a useful summary of requirements within Chapter 6 for approving additional land not within the shaded areas of Map A. However, there may be other objective and policy requirements as well as this policy. Any assessment of additional land should be against Chapter 6 in its entirety, as I do not consider these to anticipated urban environments, but I do consider that 6.3.11 is a useful starting point for any assessment, as it is what the Canterbury Regional Council have stated as their requirements. Additional matters could include:
- The requirements of CRPS policy 6.3.3 in respect of Outline Development Plans.
 - The requirements of sustainability in CRPS objective 6.2.2, particularly greenhouse gas emissions in the context of this inclusion in Policy 1, NPSUD.
 - The urban form and settlement requirements in Objective 6.2.2, and the housing choice requirements in objective 6.2.3(4), and policy 6.3.2(5).
96. CRPS policy 6.3.12 sets out the requirements for rezoning FDAs. As FDAs have been incorporated in the RPS by Change 1, following that process, I consider these to be anticipated urban environments that do not require testing against the rest of Chapter 6, except insofar as the particular parts of CRPS 6.3.12 also require reference to other parts of the CRPS, for example, on natural hazards or airport noise.
97. I note that CRPS policy 6.3.12(1) requires there to be a medium term capacity shortfall to enable release of land from FDAs. It does not specify what to do in the event of a long-term

capacity shortfall. In this regard it more than gives effect to the NPSUD requirements, which only assess sufficiency on the basis of a 3-year horizon, however, in the event that the housing market situation required the release of land to satisfy long-term demand, CRPS policy 6.3.12(1) would not be responsive on its own. However, if the NPSUD responsive planning provisions are used as well as the CRPS in this regard, then long term land could be released, stepping outside of 6.3.12(1).

98. Importantly, I cannot identify any provisions within the CRPS which directly conflict with the NPSUD.

2.6.7 Application of the Greater Christchurch Spatial Plan 2024

99. The Greater Christchurch Spatial Plan (GCSP) was adopted by the Waimakariri District Council, Selwyn District Council, Christchurch City Council, and Canterbury Regional Council in March 2024 under the Local Government Act 2002. It is a Future Development Strategy (FDS) in the meaning of the NPSUD, and under s74 RMA, can be had regard to.
100. Map 1 of the GCSP uses the dashed-line of Map A of the CRPS to define 'Greater Christchurch'.
101. It does not define 'urban environment' either, instead using the terms 'urban areas' and 'priority areas' when mapping. None of the figures and maps within the GCSP show the rural areas of the Waimakariri District to be intended as urban, except where new priority areas have been added, which for the Waimakariri District is only the special purpose zone at Tuahiwi. This is a unique and bespoke approach to facilitating growth based on the historical context of MR873, and to give effect to Kemps Deed, and I do not consider this to be an interpretation that can be applied more broadly.
102. I consider that the GCSP defines what a future 'well-functioning urban environment' is intended, or anticipated to be, to be in the context of Greater Christchurch in the context of local authority decision-making.

2.6.8 What is the 'urban environment' for the purposes of the Waimakariri District

103. In conclusion I consider that the *anticipated urban environment* for the purposes of the Waimakariri District is the following:
- The urban areas as shaded grey, green, and orange on Map A, CRPS which are intended to be urban in character form the urban environment *for the purposes of the first limb of the NPSUD definition* and their associated housing and labour market catchments. This includes urban areas within the 'Greater Christchurch' dashed line, such as Rangiora, Kaiapoi, and Woodend/Ravenswood/Pegasus, and urban areas outside of the dashed-line, such as Oxford, and the various settlement zones. The catchments for each of these towns may be outside of the dashed-line/Greater Christchurch.
 - The dashed-line of Map A can be considered to contain the bulk of the Greater Christchurch housing and labour market, but not all of it. I note that the draft RPS takes this approach, defining the housing and labour market catchment as including the Greater Christchurch dashed line, but not limiting it to this line.
 - The Tier 1 Christchurch urban environment is not the only urban environment within the District, as the principal towns of Rangiora and Kaiapoi may have their own urban environments, separate to the Tier 1 Christchurch environment, due to supporting a

combined housing and labour market of more than 10,000 people. The boundaries of these non-Tier 1 additional housing and labour markets may extend beyond the Waimakariri District, for instance, into Hurunui District.

104. Housing and labour markets are different from existing and intended urban areas, and largely contingent on the urban areas themselves. I consider that the process of trying to combine them, such as the interpretations of the dashed line on Map A/‘Greater Christchurch’ as the urban environment containing both all of the existing and intended urban areas and their housing and labour market catchments has led to the current confusion.
105. It may be that most of the housing and labour market for Greater Christchurch exists within the shaded area of Map A, but this is not the same as all of the housing and labour market catchment existing within the dashed-line. This part of Map A may also contain housing and labour market catchments for other urban environments, such as if Rangiora or Kaiapoi formed their own non-tier 1 urban environment, which I consider they may do.
106. Separate maps for each limb of the definition might remove the confusion, but I also note that if the outer extent of housing and labour markets is the district boundary, as defined by the Appendix to the NPSUD, or across multiple district boundaries, then mapping the housing and labour markets may not serve a useful purpose, and as these markets are always changing, defining them in a fixed way may not be helpful.
107. I consider that an urban area, especially a large urban area such as Christchurch City, will always have a housing and labour market around it, largely based on proximity. I consider that it is Christchurch, and proximity to it, which drives most of the demand.
108. The degree to which a housing and labour market is driven by Christchurch City will reduce with distance from the City. There may also be overlap with the housing and labour market for non-Tier 1 urban environments. This may be why Map A, in its various iterations, and the GCSP does not undertake the task of defining housing and labour markets. Regardless, neither the CRPS or GCSP has undertaken the task of mapping the housing and labour market of at least 10,000 people.
109. I consider that the most important planning recommendation is determining where an area is, or intended to be, urban in character- as in, it will have the built form of an urban area. Because a housing and labour market catchment is attached to an urban area, it follows the urban area, making the first recommendation – of where to locate, or not to locate, an urban area as the most important.
110. In this context, I consider that Map A, CRPS in its various iterations, already undertakes the task of mapping the first limb of the definition - areas that are, or are intended to be urban in character by the relevant local authority. The GCSP continues this approach of defining the current and future urban areas as shaded areas on its various maps. The GCSP does not outline any intended future urban areas beyond the existing urban areas within the district, keeping these areas as white on the maps.
111. I further note that the urban environment definition is not particularly determinative on planning assessments by itself, as *unanticipated urban environments* can be considered under the Policy 8 pathway. It is the significant development capacity and well-functioning urban environment tests within Policy 8 that are determinative. Such a test then requires a

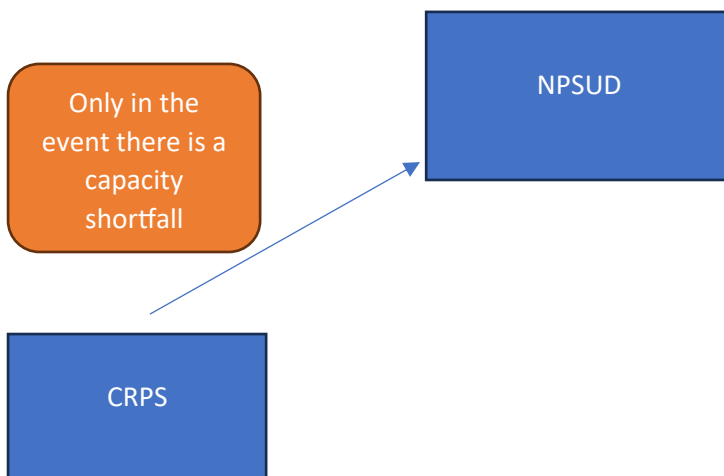
consideration of the unanticipated urban environment against the anticipated urban environment.

112. An area needs to meet both limbs of the definition, to be intended to be urban in character, *anticipated* by the local authority in planning documents, as well as part of a housing and labour market catchment of more than 10,000.
113. Unanticipated urban environments may become part of the anticipated urban environment, but only after passing the well-functioning urban environment test within the responsive planning provisions.

2.6.9 How I apply the NPSUD and CRPS together

114. There are several approaches to interpreting the NPSUD and CRPS to arrive at a policy pathway for assessing rezoning applications. I have taken the approach as outlined in *King Salmon*²⁴ to:
 - *make a thoroughgoing attempt to find a way to reconcile them*
 - *understand the wording of higher order provisions, particularly in determining how directive they are intended to be and thus how much or how little flexibility a sub-ordinate decision-maker might have*
115. I consider that there are four potential approaches to interpretation, which I outline below. Critical to all scenarios is if or how to apply Policy 8 of the NPSUD, which I discuss under each scenario. I show the four approaches visually to assist. I will then comment on which of the four approaches represents my preferred interpretation approach / policy pathway for assessing the submissions.

Interpretation approach 1 – begin with the CRPS, then the NPSUD, in the event that there is a capacity shortfall



116. As I outlined above, I consider that CRPS largely gives effect to the NPSUD, as did all other planners in the JWS, and as such, one possible interpretation approach is to consider that there may be no need to step outside of the CRPS and use the NPSUD.

²⁴ Environmental Defence Society Inc v The New Zealand King Salmon Co Ltd [2014] NZSC 38

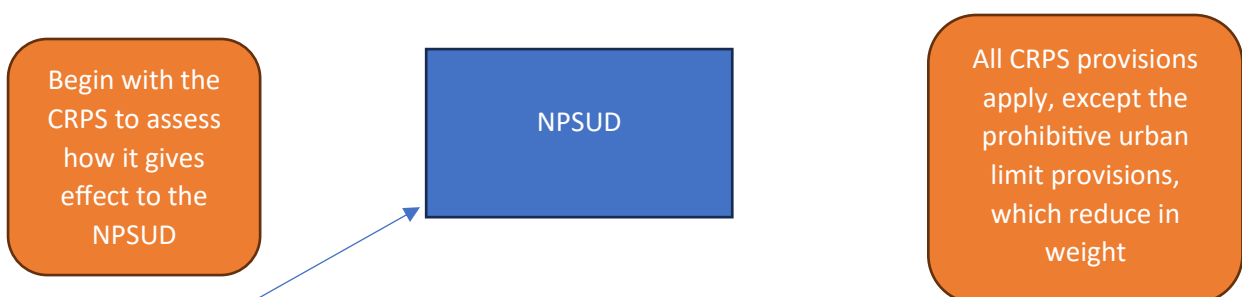
117. In support of this scenario, I note the following:

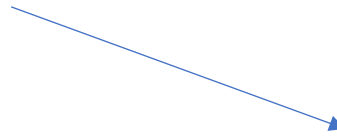
- If sufficient land is available based on the CRPS provisions, including shaded areas identified in Map A, and assessed against all of the rezoning submissions received, and there is no medium term capacity shortfall on the basis of the approved submissions, then there is no need to step outside of the CRPS.
- The Policy 6.3.1 method suggest that applications for development and rezoning to be treated collectively to achieve an integrated assessment. Whilst this does not specifically refer to a district plan review occurring under the CRPS framework, this collective approach is also the requirement of s32 RMA.
- Objective 6.2.1(a) outlines what ‘at least sufficient development capacity is”, and whilst NPSUD Policy 8 provides the test of “significant development capacity”, I consider this is in the context of the overall NPSUD Policy 2 requirements for at least sufficient development capacity. NPSUD Policy 8 is a filter that ensures that it is the significant proposals that are enabled by this gateway in the context of overall capacity, not a gateway that is open to all proposals.
- I do not consider this interpretation approach to be a first-past-the-post numbers game, in so far that the CRPS pathway simply closes off once the housing bottom lines in Objective 6.2.1(a) are reached, because of the phrasing of “at least”, and the other requirements of the CRPS, particularly policy 6.3.2 to achieve good development form and urban design. Such an interpretation approach will still result in the need to make planning assessments in relation to transport routes and probable urban boundaries, which will likely result in additional land over and above that identified to achieve the housing bottom lines needing to be rezoned.
- There is also the consideration of different supply and demand scenarios which may result in additional land being required, as ‘at least sufficient’ is interpreted in the context of supply and demand scenarios. The District has adopted a “high” scenario at present.

118. The question arises of how to handle unique and bespoke proposals, or proposals that respond to other developments, such as changes in transport routes. On this I consider that the CRPS provides guidance in the form of the monitoring and review criteria under 6.3.11, particularly 6.3.11(5), but only in the context of the Canterbury Regional Council decision-making. Whilst a District Council can undertake reviews of land capacity and sufficiency in relation to housing bottom lines, Map A itself will not change, and any rezoning recommendations that are outside the shaded areas in Map A in a district plan would not be possible.

119. Thus, in this context I consider that whilst CRPS is responsive in the sense of the Policy 8 requirements in the context of the shaded areas within Map A, it is not responsive for proposals outside of those areas, as the CRPS provisions prohibit these developments. It is also not responsive in the context of release of land to meet long term demand, noting that 6.3.12(1) for release of land within the FDAs only applies to a medium term shortfall, not long term shortfalls.

Interpretation approach 2 – use the CRPS, then the NPSUD, then the CRPS



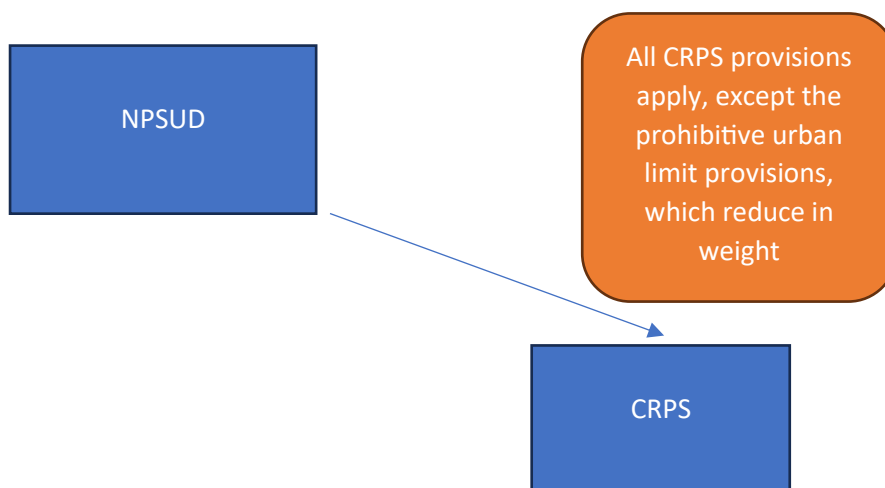


120.

121. This approach still requires beginning with the CRPS in order to assess the degree to which the CRPS has given effect to the NPSUD, much as I have done above, but only in the context of assessing the degree that it has given effect to the NPSUD.
122. Once an assessment of consistency between the NPSUD and CRPS has been undertaken, rezoning submissions would need to be assessed against the NPSUD, and in most cases require the Policy 8 conjunctive test of “providing significant development capacity”, and “contributing to well-functioning urban environments” to be met.
123. I note that NPSUD Objective 6, provides an overarching requirements to make decisions that are integrated with infrastructure and funding, are strategic over the medium and long term, and are responsive, including in relation to proposals that would supply significant development capacity. As such, there may be a relaxing of the requirement for significant development capacity to be provided in the context of Policy 8. All proposals must receive responsive treatment.
124. As I have stated above, it does not matter if the urban environment is anticipated or unanticipated for the purposes of applying the Policy 8 gateway. The anticipated urban environment component matters when applying the specific test of well-functioning urban environment.
125. For the first test in NPSUD Policy 8, I consider that the CRPS may assist in defining what “at least sufficient development capacity is”, namely, the housing bottom lines in Objective 6.2.1(a) which outline the minimum requirements. I consider that this provides guidance on how to interpret the “significant development capacity” test in NPSUD Policy 8 in the context of any specific development proposal, or a set of proposals, considered in the round, such as a district plan review that assesses many rezoning proposals.
126. For the second test, I consider that the CRPS implements the NPSUD provisions, particularly Policy 1, that define what a “well-functioning urban environment” is, by way of the strong alignment between the NPSUD policies and the CRPS policies²⁵, and the spatial identification of the shaded areas intended for growth in Map A. The CRPS provisions provide substantial detail on what a well-functioning urban environment is in the context of Greater Christchurch, which would have strong weight in any consideration.

²⁵ As I assessed above

127. NPSUD Objective 6 and Policy 8 are a gateway allowing the consideration of all development proposals, overriding existing frameworks, it overrides CRPS Map A and CRPS Objective 6.2.1 to the extent that Map A and this Objective 6.2.1 (and the CRPS policies that implement it) is currently restrictive on where urban development is to occur.
128. Thus I consider that rezoning proposals for locations outside of the shaded areas in Map A can be considered under Policy 8, however, they would need to provide significant development capacity²⁶ and contribute to well-functioning urban environments. The CRPS provides detailed requirements that set out what a well-functioning urban environment is.
129. Particularly, I note the Policy 6.3.11(5) requirements for rezoning land outside of the shaded areas in Map A to continue to achieve a consolidated urban form and maintain rural character between existing towns. I consider that this provides guidance on appropriateness for the location of new urban areas, as in, adjacent to existing towns and key activity centres, so I consider that the shaded areas in Map A and the overarching policy provisions that support them have still have significant weight in decision-making.
130. I do not consider that there a single provision in the CRPS that covers the full field of provisions, however, as stated above, I do consider that CRPS 6.3.11 provides a useful starting point, although other objectives and policies may apply.
131. There may be some types of development that are not urban housing or business, that do not fall within the ambit of the NPSUD, as I am conscious it is not a policy statement on all forms of development. These would need to be considered under the CRPS as well as any higher level guidance that may exist.

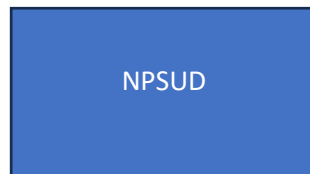


Interpretation approach 3 – begin with the NPSUD

²⁶ Noting the slightly different interpretation that NPSUD Objective 6 provides on interpreting significant development capacity in requirement to be responsive, potentially not just to those proposals that add significant development capacity.

132. This approach is essentially the same as interpretation approach 2, except it begins the assessment at the NPSUD, and would assess the degree to which the CRPS gives effect to the NPSUD for each specific application, rather than overall as with interpretation approach 2.
133. There is potentially some nuance in how Policy 1, NPSUD is interpreted in this regard. It can be interpreted as Policy 1 first, then the “at a minimum” statement in Policy 1 requires one to then look at the CRPS. I consider that it is not just Policy 1 that needs to be assessed on how the CRPS may give effect to it, it is all NPSUD objectives and policies, and that the CRPS may not just apply by way of the “at a minimum” additionality. It could apply overall based on consistency and content.

Interpretation approach 4 – remain at the NPSUD



134. This approach uses the NPSUD alone, and does not give weight to the CRPS provisions.

Preferred interpretation approach / pathway

135. For the purposes of my assessment, I prefer and adopt interpretation approach 2, noting that I consider that NPSUD Objective 6 Policy 8 is an overarching requirement to be responsive to all development proposals regardless of the underlying planning framework. The spatial constraints of Map A and Objective 6.2.1(3) are not prohibitive or determinative in this approach, however they would still have considerable weight.
136. The only practical difference between interpretation approach 2 and interpretation pathway 3 is where the pre-assessment of the degree to which the CRPS gives effect to the NPSUD occurs. If this occurs prior to applying the tests, as I have done above, then its interpretation pathway 2, but otherwise, interpretation pathway 2 and interpretation pathway 3 are the same. They end at the CRPS.
137. I do not think capacity is determinative on the policy pathway, capacity is a factor to consider, but it does not alone trigger the various gateways in the relevant documents. Instead I think that capacity is a matter to have regard to and account for in decision-making, particularly in the context of s32AA RMA. For this reason I do not support policy pathway 1 as it uses a capacity trigger to invoke the NPSUD.
138. I cannot support interpretation approach 4, or any interpretation approach that begins and ends with the NPSUD alone, and I also note that any consideration that only uses the NPSUD may be inconsistent with the planners’ statements in the joint witness statement that considered that the CRPS did largely give effect to the NPSUD.
139. I use interpretation pathway 2 in my assessments, but I note that interpretation pathway 3, or any other policy pathway that ultimately ends up in considering and placing substantial weight on the CRPS would also be consistent with my approach.

2.7 Rating deferrals

140. The Waimakariri District Council has a policy on rating postponements for land that has been rezoned but where landowners have no intent to develop immediately. There is an ability to seek a deferral of rates. This policy and how it operates is explained in Appendix I.

2.8 How rezoning submissions have been assessed

2.8.1 Technical advice

141. Whilst there is no overall test on which to assess rezoning submissions, with each submission assessed on its own merits. I sought technical advice from Council engineers, and where internal advice was not available, from external experts. This advice includes the following technical assessments of submissions, submitter evidence, and PDP plan provisions (such as the requirements in the notified ODPs for the FDAs). I have generally included the following matters for assessment:

- Natural hazards
- Geotechnical
- Three water servicing – stormwater, wastewater, potable water
- Transport
- Greenspace
- Urban design
- Cultural
- Bigger proposals have received a greenhouse gas assessment, either where these are outside of the anticipated urban environment, or in response to evidence from that submitter.

142. I have assessed each submission is then assessed in the overall policy and planning context as outlined below, but I note a difference in that I consider there to be differing frameworks for *anticipated* and *unanticipated*²⁷ urban environments. I respond to this in considering the merits of each individual submissions.

143. A variety of evidence has been provided, including from Council in response to individual submissions. I note that some applicants have supplied evidence that I would consider to be similar in nature to what might be provided with a subdivision consent.

2.8.2 Cultural advice

144. Cultural advice was provided from Te Ngai Tūāhuriri Runanga for all of the rezoning areas within existing urban areas or FDAs. I have provided the components of this specific advice in the context of the areas for rezoning, however, general advice specific to their assessments is below:

²⁷ In the context of what a local authority considers to be anticipated by planning documents

- *Waimakariri District Council proposes to rezone areas within the district for medium density residential development.*
- *The following areas have been identified:*
 - *Area 1 – Southeast Rangiora Development Area (SER)*
 - *Area 2 – Northeast Rangiora Development Area (NER)*
 - *Area 3 – West Rangiora Development Area*
 - *Area 4 – Kaiapoi Development Area*
 - *Area 5 – Woodend areas*
- *Bellgrove North within Area 2 – Northeast Rangiora Development Area and Townsend Fields within the Southeast Rangiora Development Area have been rezoned and are being developed.*
- *The Waimakariri District Council provided mapped areas that are proposed for rezoning to medium density residential. Two of them (Bellgrove North within the NER area, and Townsend Fields in the SER area) have already been rezoned under Variation 1, have received subdivision and land use consent, and are being developed.*
- *All of the areas are within the projected infrastructure boundary in Map A, CRPS. All of the areas apart from the Woodend area and the bottom part of Rangiora are future development areas, and have been proposed for residential development for many years.*
- *Some of the areas are within 1 or more SASMs (sites of significance to Māori). The NER and SER areas are within the headwaters of the Cam/Ruataniwha river.*
- *This report is provided as preliminary advice for Waimakariri District Council as part of plan change stage of development. It provides preliminary, general/non-specific, non-exhaustive guidance.*
- *This report does not constitute a full assessment for all development but is provided to give assistance at the early stages of development. It is recommended that the Council request a more robust and site-specific assessment of development with each subdivision application.*
- *Any consultation with Rūnanga at plan change stage does not eliminate the requirement for the consenting authority to consult with mana whenua at the application stage. More details and expert advice become available as part of this process.*

145. Specific advice on the areas identified in the report is outlined as follows:

- *The above policies from the Mahaanui IMP provide a framework for providing guidance at the plan change phase of development.*
- *Area 1 – South East Rangiora Development Area Area 2 – North East Rangiora Development Area Area 3 – West Rangiora Development Area*
- *Area 4 – Kaiapoi Development Area Area 5 – Woodend areas*

- *There are particular cultural sensitivities with regards to residential development in the eastern areas of the district. The concerns are associated with the cultural landscape, groundwater levels, waterways, mahinga kai values and taonga species.*
- *Te Ngāi Tūāhuriri Rūnanga are opposed to the rezoning of Area 4 — Kaiapoi Development Area. The scale of the proposed rezoning area is considerable, and the site is within a culturally sensitive area. This is identified by the SASM002 and SASM013 overlays within the District Plan. The site is also within the Ashley Estuary (Te Aka Aka) and Coastal Protection Zone. The area is identified as a historical wetland area within Black Maps and many wetland type features and waipuna (springs) have been lost due to the development that has occurred adjacent to this area. These features provide habitat for indigenous/taonga species and are remnants of the pre-European landscape.*
- *There are concerns regarding Area 1 — Southeast Rangiora Development Area, however, it is acknowledged that this area has been rezoned and is currently being developed.*
- *Area 5 — Woodend areas are of smaller scale and are viewed as within areas currently being developed for residential development.*
- *For areas 1, 2, 3 and 5 the following paragraphs are provided for cultural context associated with recommendations.*
- *As per policy WM13.1 and WM13.2 all wetlands, waipuna and riparian areas are wāhi taonga. It is critical that existing wetlands, waipuna and riparian areas are protected, maintained or enhanced, degraded areas are restored, and opportunities taken to re-establish wāhi taonga across the landscape. As such, they should be identified, protected and enhanced. A survey for springs should be undertaken by a suitably qualified expert to determine whether any springs whether permanent or seasonal are within the site. Subdivision design should include appropriate setbacks and riparian buffer zones planted with indigenous species. Waterways should be retained in their natural or existing form.*
- *Drains are a common feature across Ngā Pākihi Whakatekateka o Waitaha, given that much of the land in lower catchment areas was originally swamp. An extensive network of drains provides flood protection for settlement and land use. Some of these drains are modified natural waterways, and many connect or empty into existing waterways and waterbodies. For this reason, drain management is an important kaupapa for tāngata whenua. While drains may not be highly valued in the wider community, drains that function as mahinga kai habitat and where mahinga kai resources are gathered may be identified as wāhi taonga by Ngāi Tahu. Waterways considered drains (or other description, such as, ephemeral water courses) should be provided the same mana as any other waterway.*
- *As per policy WM12.5 there should be a minimum riparian buffer of 10 metres and up to 50 metres for waterways.*
- *The developer should undertake a preliminary assessment to determine whether there is publicly available information to identify culturally sensitive areas within the site. Where a culturally sensitive area is identified, the developer should provide suitable protection and enhancement measures.*

- *Low impact design methods are encouraged, such as, onsite stormwater management, good management practices for earthworks, encouraging efficient water usage and waste minimisation, and incorporating indigenous planting in landscape plans. Refer to Ngāi Tahu Subdivision and Development Guidelines (Appendix 1) for low impact design methods endorsed by mana whenua. Stormwater should be treated prior to discharge whether to ground or to the Council's reticulated network.*
- *Earthworks should be minimised and managed to avoid damaging sites of significance or causing erosion and sediment issues. Any activity that involves ground disturbance has the potential to uncover cultural material or wāhi tapu. As a minimum, an accidental discovery protocol should be place during all earthworks.*
- *Contaminated land can have adverse effects on the environment, including the potential for contaminants to leach into groundwater. Contaminated land can also have effects on Ngāi Tahu cultural associations. Contaminated land should be remediated, and no contaminated material should remain on the site. All contaminated material should be removed and disposed of at a licensed facility.*
- *Shallow depth to groundwater and earthworks over an aquifer is of concern. This often generates sediment laden water which should be treated prior to discharge. There are concerns about residual chemicals associated with the use of flocculants and coagulants. There are also concerns regarding earthworks over an aquifer as this can cause contamination of groundwater and surface water.*
- *Constructability issues should be considered at the design phase as earthworks over shallow aquifers is becoming more common. This can have cultural impacts particularly where there are contaminated soils on the site.*
- *Restoring indigenous biodiversity values is one of the most important challenges for the future management in the takiwā. A healthy economy relies on a healthy environment. Indigenous biodiversity, along with air, water and soil, are taonga; they are the region's natural capital, providing a suite of essential ecosystem services. Although these services are often taken for granted, they have immense value to cultural, social and economic wellbeing. It is recommended that the site is surveyed by a suitably qualified person to determine whether there are taonga species within the site should be protected.*
- *The whole of the Canterbury region has cultural landscape value: Ngāi Tahu travelled through, engaged with and named the land, and tāngata whenua history is part of the landscape. However, within this landscape of Ngāi Tahu land use and occupancy particular areas are identified as cultural landscapes. A cultural landscape is a geographical area with particular (and often related) traditional, historical, spiritual and ecological value to Ngāi Tahu. An area may be identified as a cultural landscape due to the concentration of values in a particular location, the particular importance of the area to Ngāi Tahu cultural, history or identity, or the need to manage an area as a particular landscape unit. Cultural landscapes are integral to Ngāi Tahu culture, identity and history, and are testament to relationship of tāngata whenua with the land over time. They are intergenerational: providing future generations (our tamariki and mokopuna) the opportunity to experience and engage with the landscape as their tūpuna once did.*

146. The overall advice from Runanga is as follows:

- *This report is a preliminary assessment against the Mahaanui Iwi Management Plan²⁸ to provide Council with guidance to the cultural impact of proposed rezoning of Areas 1, 2, 3, 4 and 5 identified.*
- *This report does not constitute a full assessment of cultural impacts for each development, and it is recommended that the Council ensures that a full assessment is undertaken on a site-by-site basis.*
- *Te Ngāi Tūāhuriri Rūnanga are opposed to the rezoning of Area 4 — Kaiapoi Development Area and consider themselves an affected party in relation to the proposed rezoning of this area. The scale of the proposed rezoning area is considerable, and the site is within a culturally sensitive area. This is identified by the SASM002 and SASM013 overlays within the District Plan. The site is also within the Ashley Estuary (Te Aka Aka) and Coastal Protection Zone. The area is identified as a historical wetland area within Black Maps and many wetland type features and waipuna (springs) have been lost due to the development that has occurred adjacent to this area. These features provide habitat for indigenous/taonga species and are remnants of the pre-European landscape.*
- *The Kaitiaki representatives of Te Ngāi Tūāhuriri Rūnanga have reviewed the proposed rezoning for areas 1, 2, 3 and 5, and provided the recommendations outlined in Section 6.0 to align these proposals more closely with the provisions in the Mahaanui IMP. **If the recommendations are provided for, the Rūnanga will not consider themselves to be an adversely affected party.***
- *Subdivision and development can provide an opportunity to enhance the urban environment. It is recommended that the design provides consideration of cultural landscape, and as an ecosystem within a larger ecosystem. The inclusion of greenspaces, indigenous habitat and biodiversity corridors is encouraged.*
- *For areas 1, 2, 3 and 5 further engagement with mana whenua is required on a site by site basis. Mahaanui Kurataiao Ltd reserves the right to update the recommendations when Te Ngāi Tūāhuriri Rūnanga provide feedback for each development within the proposed areas 1, 2, 3 and 5, as consultation with Rūnanga at pre-application stage does not eliminate the requirement for the consenting authority to consult with mana whenua at the application stage. More details and expert advice become available as part of this process.*

2.8.3 Cultural advice conclusions

147. The following are direct quotations (in bold) from the cultural advice received:
148. *For area 5, no recommendations are provided as there are no measures deemed suitable to mitigate the effects of the proposed activity on mana whenua values. **[I note that I consider that the report is actually referring to area 4 here].***
149. *The following recommendations are provided to moderate impacts of development on mana whenua values for areas 1, 2, 3 and 5:*
- *Waterways should be protected and enhanced with suitable setbacks and riparian buffers planted with indigenous species (see policy WM12.5).*

²⁸ The overall cultural advice is provided in Appendix G

- *There should be a survey undertaken to identify springs and/or wetlands on the site. This should be undertaken by a suitably qualified expert. Springs and wetlands should be protected and enhanced with suitable setbacks and indigenous riparian planting.*
- *Areas identified as culturally sensitive should be protected and enhanced. Consultation with the Papatipu Rūnanga may be required to determine culturally appropriate methods of enhancement.*
- *Low impact design methods, such as, the use of rain and greywater collection and re-use systems, and minimising impervious surface area is encouraged. Refer to Ngāi Tahu Subdivision and Development Guidelines (Appendix 1) for low impact design methods endorsed by mana whenua.*
- *Contaminated sites should be remediated. All contaminated material should be removed from the site and disposed of at a licensed facility.*
- *Measures to minimise earthworks should be considered at the design phase of development.*
- *Earthworks in areas with shallow depth to groundwater and/or over an aquifer can have significant cultural impacts and are of concern.*
- *The site should be surveyed by a suitably qualified person(s) to determine whether there are taonga species within the site that need to be protected.*
- *Refer to Ngāi Tahu Subdivision and Development Guidelines (Appendix 1) for guidance on stormwater, water supply and wastewater servicing.*
- *Note: The list of recommendations is preliminary, general/non-specific and non-exhaustive and is provided as preliminary guidance only.*

150. Overall, in response to this advice, I recommend that that ODP narrative text for each FDA refers to these above matters.

151. I also note the following matters of control and discretion apply for any subdivision consent activity status:

SUB-MCD13	<p>Historic heritage, culture and notable trees</p> <ol style="list-style-type: none"> 1. Any effect on historic heritage, its heritage values and on any associated heritage setting. 2. The extent that HNZPT has been consulted and the outcome of that consultation. 3. The extent that the site has cultural or spiritual significance to mana whenua and the outcome of any consultation undertaken with Te Ngāi Tūāhuriri Rūnanga. 4. Opportunities to incorporate representation of the association of Te Ngāi Tūāhuriri Rūnanga into the design of residential and commercial subdivision. 5. Opportunities to enhance the physical condition of historic heritage and its heritage values.
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	<ol style="list-style-type: none"> 6. Any mitigation measures proposed to be implemented to protect historic heritage and its heritage values. 7. The extent to which the subdivision layout and design provides for the protection of any notable tree. 8. Any effect on a notable tree as a result of the subdivision or identified building platform or platforms, and whether alternative methods or subdivision design are available to retain or protect the tree.
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SUB-MCD7	<p>Mana whenua</p> <ol style="list-style-type: none"> 1. The extent to which protection of sites and areas of significance to Māori as set out in SASM-SCHED1 is provided for through the subdivision. 2. Provision of public access along and in the vicinity of the Taranaki Stream. 3. The effectiveness and environmental effects of any measures proposed for mitigating the effects of subdivision on wāhi taonga identified by Te Ngāi Tuahuriri Rūnanga.
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2.8.4 Framework for report

152. My framework for rezoning recommendations undertakes the following:

- Structures the report on the basis of geography, focusing on the rezoning proposals in and around the towns of Rangiora, Woodend, Pegasus, and Kaiapoi, which is where the bulk of the submissions are located. This structure largely follows a clock-wise compass direction around the towns, beginning in the west and finishing in the south.
- Following the recommendation on the submission itself, recommends a categorisation of the rezoning submission for the purpose of an overall s32AA evaluation of all rezoning submissions. I have accounted for rezoning submissions on the following basis:
 - Anticipated areas, for rezoning submissions that fall within existing urban areas, greenfield priority areas, future development areas, or the projected infrastructure boundary as shaded grey, orange, green, within Map A, CRPS, where the policy framework anticipates that these areas will be rezoned.
 - Unanticipated areas, for rezoning submissions that I consider fall outside the shaded areas in Map A. This bundle of recommendations includes areas within the projected infrastructure boundary (black line, Map A), but which have not been, for various reasons, currently identified for future growth. It also includes areas that might become available due to other changes, such as new

infrastructure proposals, areas outside of the shaded or bounded areas in Map A, but adjacent or close to those areas, and areas distant to existing urban areas or with other constraints.

- I assess future capacity with lower, upper, and midpoint/average scenarios, based on the types of development and densities being achieved in the District to date. The section on capacity within this report and Appendices on housing uptake provide insight into this. For instance, for developments, I assess
 - An upper bound scenario, based on 200m² allotments, noting that this is at the higher end of the densities being achieved in the District to date.
 - Some upper bound scenarios, such as for general residential rezonings, are assessed on an upper bound of 500m² allotment sizes.
 - A lower bound scenario, based on the nature of developments in that specific area, usually between 500m²-800m².
 - An average or midpoint scenario between these numbers.
- I have assessed reserves on a preliminary basis from what is contained within ODPs, recommendations in this report, and for aspects such as roading, what has been achieved elsewhere in the District.
- I add up capacity on the basis of my recommendations, including the other rezoning recommendations as recommended by other authors as a wrap-around. I have not included the recommendations of other authors where they have recommended to reject.
- I can adjust the parameters of the capacity assessment arising from rezoning recommendations in my Right of Reply in response to hearing evidence and discussions, if required.
- **I note I do not assess feasibility, I assess plan-enabled capacity arising from rezoning recommendations. Mr Yeoman has assessed feasibility in his evidence.**

153. I consider that this approach enables various housing bottom line and capacity scenarios to be tested against the rezoning recommendations, providing upwards or downwards flexibility on recommendations if needed in the context of capacity.

154. I acknowledge that if the Panel reaches a different conclusion on the rezoning requests, that capacity outcomes may need to be further tested.

155. I am not assessing the feasibility of these developments, or otherwise, I am putting forward a range of scenarios based on my assessment of plan-enabled capacity. Mr Yeoman has provided evidence on feasibility.

2.8.5 Rezonings within FDA

156. CRPS Objective 6.2.2(4) specifically requires to the circumstances set out in CRPS Policy 6.3.12 to be met for the rezoning of land within Future Development Areas, as follows:

Enable urban development in the Future Development Areas identified on Map A, in the following circumstances:

1. It is demonstrated, through monitoring of housing and business development capacity and sufficiency carried out collaboratively by the Greater Christchurch Partnership or relevant local authorities, that there is a need to provide further feasible development capacity through the zoning of additional land in a district plan to address a shortfall in the sufficiency of feasible residential development capacity to meet the medium term housing bottom lines set out in Table 6.1, Objective 6.2.1a; and

2. The development would promote the efficient use of urban land and support the pattern of settlement and principles for future urban growth set out in Objectives 6.2.1 and 6.2.2 and related policies including by:

a. Providing opportunities for higher density living environments, including appropriate mixed use development, and housing choices that meet the needs of people and communities for a range of dwelling types; and

b. Enabling the efficient provision and use of network infrastructure; and

3. The timing and sequencing of development is appropriately aligned with the provision and protection of infrastructure, in accordance with Objective 6.2.4 and Policies 6.3.4 and 6.3.5; and

4. The development would occur in accordance with an outline development plan and the requirements of Policy 6.3.3; and

5. The circumstances set out in Policy 6.3.11(5) are met; and

6. The effects of natural hazards are avoided or appropriately mitigated in accordance with the objectives and policies set out in Chapter 11.

157. I consider FDAs to be anticipated urban environments, with urban development to be enabled if the tests above are met, so where rezonings are proposed within an FDA, I will test the specifics of the rezoning proposal against CRPS Policy 6.3.12, except where the particular provisions above require discussion of the other CRPS provisions that they reference. I note that (1) above is not necessarily consistent with being responsive to proposals to release land for development beyond a medium term capacity scenario.

158. I note that CRPS 6.3.12(1) requires there to be a medium term capacity shortfall only. However, as I use policy interpretation approach 2, I consider CRPS 6.3.12 in the context of the responsive planning provisions, which I consider enable long-term capacity needs to be assessed, stepping outside of the medium term provision.

159. As land within the FDAs has already been through a planning process by way of Change 1 to the CRPS, I do not consider that land within them requires assessment against the full suite of CRPS objectives and policies.

160. Where submitters have requested extensions to, or additional FDAs, then the full requirements of the CRPS apply, but I begin that assessment with 6.3.11, as I consider this a good, but non exhaustive summary policy of the CRPS policy provisions, and what the Canterbury Regional Council is required to assess if changes are requested to Map A.

2.8.6 Which zone to apply?

161. The notified PDP contained a proposed medium density residential zone (PDP MDRZ) in the centres of Rangiora and Kaiapoi, within 800m of the town centres This zone allowed for medium

density residential housing with a height of up to 12m, a maximum building coverage of 55%, and a range of other building standards that were similar to the central government imposed MDRS, albeit with a 200m² minimum allotment size.

162. In 2021, the RMA Enabling Housing Amendment Act (RMEHA) required all tier 1 councils to amend their District Plans through an Intensification Planning Instrument (IPI) – Variation 1 – to give effect to the MDRS in all relevant residential zones, by way of an intensification planning instrument (IPI), Variation 1, and to also give effect to the MDRS in consent decisions under s77M.
163. The MDRS itself is a set of specific provisions in schedule 3A RMA which must be incorporated into plans. This includes objectives, policies, and specified activity standards and notification enabling land use and subdivision for up to 3 residential units, provided that the MDRS standards are met.
164. I consider that the differences between the potentially available zones are important in understanding the effects of these zones, if they were to be applied to land as a result of upzoning.

Differences

165. I consider that the primary differences between the PDP notified MDRZ and the MDRS are as follows:
 - No minimum lot size, whereas the PDP MDRZ had a minimum lot size of 200m²
 - A permitted activity for up to 3 units per site, whereas the PDP MDRZ enabled only 1 primary unit with 1 smaller unit.
 - A maximum site coverage of 50%, whereas the PDP MDRZ had a site coverage of 55%.
 - The MDRS height in relation to boundary and recession plane provisions are more enabling, particularly in respect of yard setbacks and height in relation to boundaries.
166. Overall, I do not consider these differences between the medium density zone built form standards to be significant. Both zones set a maximum height of 11 (+1m for roof space).
167. The significant change with the MDRS is enabling up to 3 units per site as a permitted activity, whereas the PDP MDRZ have a limitation of 1 primary and 1 attached smaller dwellings per site, with a 200m² minimum lot size applying to the primary unit. In practice, this is not a large change, as few developments are using a minimum site size of below 200m², and as of the time of writing, I understand the smallest lot size in the district is 186m².
168. The MDRS applies to all relevant residential zones in the district, which replaces the existing general residential zones in urban areas with the MDRS. Practically, this means going from 2 storeys to 3 storeys in height in the general residential zones, and enabling up to three units per site as a permitted activity, with no minimum lot size.
169. I note that the general MDRS matters are to be heard in Stream 7. I outline them here to provide context.
170. I refer to the notified PDP medium density zone as the PDP medium density zone, and the MDRS medium density zone as the V1 medium density zone. However, I try not to discuss V1 matters

in this report except where absolutely necessary to provide context. Recommendations on submissions requesting rezonings under V1 are within the s42A report on Variation 1.

What zoning to apply if residential rezoning requests are approved

171. The question arises of what medium density residential zone to apply. I note that the RMAEHA has the practical effect of superseding the PDP medium density zone with the MDRS, by way of s77M RMA in relevant residential zones. s77M RMA applies to all consent decisions, so whilst the PDP MDRZ zone still technically exists, the MDRS supersedes it for all practical purposes, particularly in a consenting context. However, the PDP MDRZ is still technically relevant in the context of a proposed zone in a proposed plan.
172. I thus consider that the highest density medium density zone which can be applied under the scope of the PDP process is the PDP medium density zone, and the ability to apply this zone is in turn limited by the scope of the submissions seeking rezoning. Not all submissions have sought PDP medium density residential zoning.
173. From a planning perspective I have considered the risk that may result in potentially having two medium density zones in the plan, and I make the following comments:
- In the context of greenfields areas, which are currently zoned rural in the Operative Plan, and proposed to be rural lifestyle in the PDP, and which contain the majority of rezoning requests, considered in this chapter, I do not consider the additional enabling rules and standards added by the MDRS are a significant consideration at the time of considering a rezoning. There are processes for considering those additional rules and standards, such as, the s42A report on rezonings under Variation 1, the overall s42A report on Variation 1, and future subdivision and land use resource consents.
 - There are limited rezoning submissions seeking rezoning or upzonings in brownfield areas
 - Where there are upzonings requested in existing residential zones, such as LLRZ to GRZ/MDRZ requests, I consider that the application of the full MDRS as a zone to these areas can only be located in the Variation 1 s42A report in the context of submissions. Any consideration of an upzoning in these areas is limited to the PDP medium density zone and the scope of the submission itself.
174. Upzoning to general residential is also an option to be tested. The primary difference between PDP general residential and PDP medium density residential is a 500m² allotment, versus a 200m² allotment for PDP medium density residential²⁹, and a two storey height limit (8m) versus three-storeys (12m) for PDP medium density residential. There are also policy differences, which I outline below:

Table 4 Comparison between PDP MDRZ and GRZ

PDP medium density residential (PDP MDRZ)	General residential (GRZ)
MRZ-P1 Residential character	GRZ-P1 Residential character and amenity values

²⁹ SUB-S1 standards, <https://waimakariri.isoplan.co.nz/draft/rules/0/301/0/107641/0/224>

<p>Provide for activities and structures that support and maintain the character and amenity values anticipated for the zone, which provides for:</p> <ol style="list-style-type: none"> 1. higher density living in areas with better access for walking to parks, main centres or local commercial centres; 2. multi-unit redevelopment opportunities through flexible development controls and encouragement for multi-site redevelopment; 3. high quality building and landscape design for multi-unit residential development with appropriate streetscape landscaping and positive contribution to streetscape character; 4. provides for a peaceful residential environment, in particular minimising the adverse effects of night time noise and outdoor lighting, and limited signs; appropriate internal amenity within sites; a mix of detached, semi-detached and multi-unit living; 5. small-scale commercial, or community-based activities, that service the local community, and home businesses; and 6. a wider range of home business-based commercial activity in the Residential Commercial Precinct adjacent to Rangiora Town Centre. 	<p>Provide for activities and structures that support and maintain the character and amenity values anticipated for the zone which:</p> <ol style="list-style-type: none"> 1. provides for suburban character on larger sites primarily with detached residential units; 2. provides for a pleasant residential environment, in particular minimising the adverse effects of night time noise, glare and light spill, and limited signs; provides opportunities for multi-unit residential development on larger sites; 3. has sites generally dominated by landscaped areas, with open spacious streetscapes; 4. through careful design provides a range of higher density living choices to be developed within the zone; and 5. provides for small scale commercial activity that services the local community, and home businesses at a scale consistent with surrounding residential character and amenity values.
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175. I note that the substantive content of the general residential standards and PDP medium density standards, alongside the application of the MDRS and Variation 1, is to be heard in Stream 7. The s42A report authors for these streams will consider integration matters to the degree they can consider them.

176. I am conscious that the Hearing Panel and Independent Hearing Panels have differing scope, and that the Schedule 1 RMA process needs to be separated from the Intensification Streamlined Planning Process used for the IPI/Variation 1. Both Panels have scope to start their assessment of a rezoning application from the existing environment on the basis of submissions and evidence, without reliance on each other, as the tests can be different, as are the appeal rights.

177. The s42A reports I have presented take this approach, with the assessments reflecting the scope of the respective processes.

2.8.7 Overall rezoning requests

178. There is one overall rezoning request, from Survus Consultants Limited [250.2], seeking the rezoning of all development areas in the District. Survus has similar submissions seeking the

rezoning of each specific development area, so I have responded to those submissions in order, and then wrapped around on this overall submission in my recommendation in Appendix B.

3 Rezoning requests in and around Rangiora

179. Rezoning submissions within Rangiora primarily fall within the future development areas, but there are exceptions.

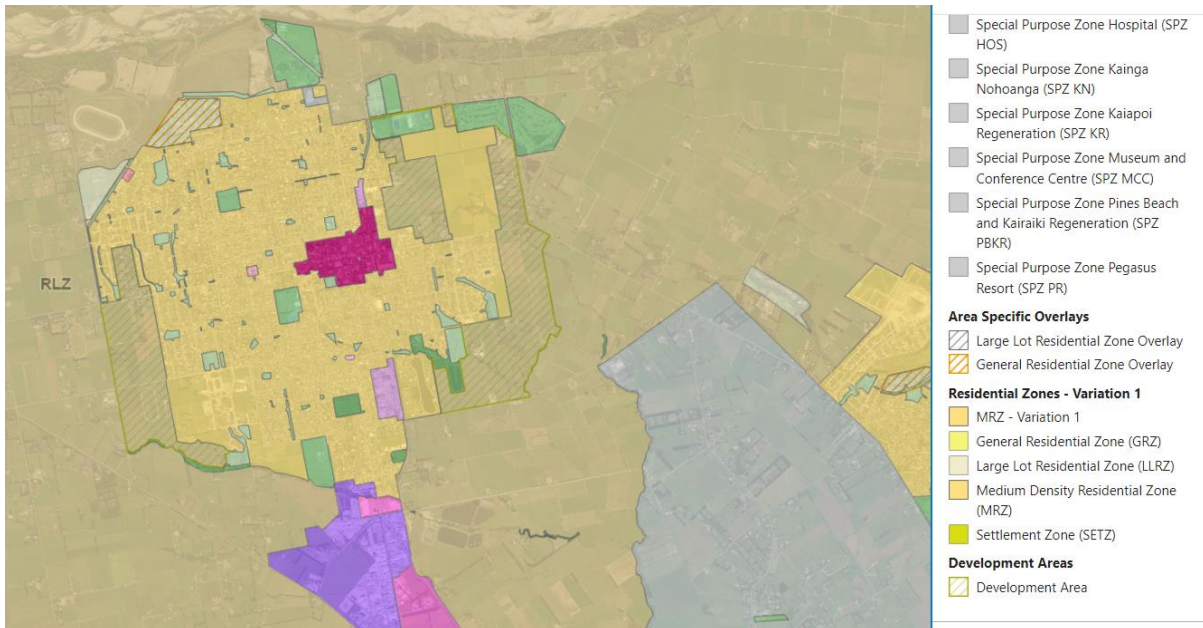


Figure 1 Location of Rangiora rezonings

180. I have categorised the submissions in blocks based the relevant development area, beginning with the West Rangiora development area and moving clockwise around Rangiora from west to the south-east.

4 West Rangiora

4.1.1 Description

181. West Rangiora is outlined below. All of the residential rezoning requests in this area are within the West Rangiora new development area, which is the green hatched area in the south-west of Rangiora as outlined below.

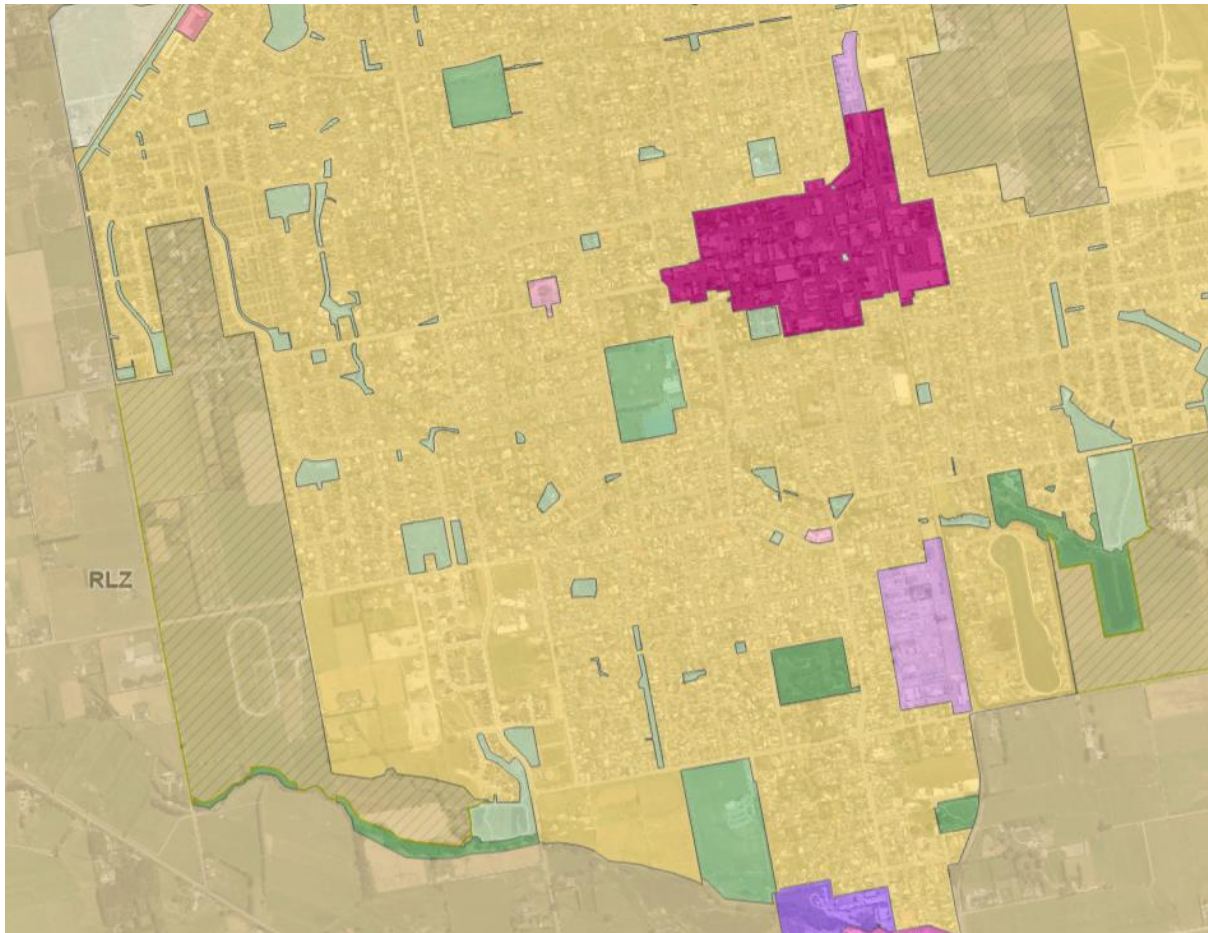


Figure 2 West Rangiora new development area

182. The West Rangiora new development area is a block of land on the west of Rangiora bounded between the existing edge of the town in the east, Lehmans Road in the west, and Southbrook Stream in the south. It is:
- Currently zoned as 'rural' in the operative district plan;
 - Proposed in the PDP as RLZ;
 - Covered by a new development area overlay that corresponds to the FDA overlay in Map A of the CRPS.
 - Within the projected infrastructure boundary, as set out in Map A of the CRPS.
 - Contains an ODP in the notified PDP, correlating to the structure planning work undertaken prior to the insertion of this area in Map A, CRPS, as part of Change 1 to the CRPS.
183. The West Rangiora development area can be broadly categorised into four blocks, as follows:

- The north block – usually referred to as the ‘Brick Kiln Lane’ area, to the north of Oxford Road.
- The middle block – between Oxford Road and Johns Road.
- The south block – between Johns Road and the Southbrook Stream. Part of this area is under development and has been referred to as the South West Rangiora development area.
- SWR dev area - the part of the south block that was rezoned under Variation 1 and is currently under development as Townsend Fields (and which appears as yellow MDRS on the map above).

184. The cultural advice is as set out above, requiring the achievement of the following in respect of this block (area 3 in the MKT report):

- *Waterways should be protected and enhanced with suitable setbacks and riparian buffers planted with indigenous species (see policy WM12.5).*
- *There should be a survey undertaken to identify springs and/or wetlands on the site. This should be undertaken by a suitably qualified expert. Springs and wetlands should be protected and enhanced with suitable setbacks and indigenous riparian planting.*
- *Areas identified as culturally sensitive should be protected and enhanced. Consultation with the Papatipu Rūnanga may be required to determine culturally appropriate methods of enhancement.*
- *Low impact design methods, such as, the use of rain and greywater collection and re-use systems, and minimising impervious surface area is encouraged. Refer to Ngāi Tahu Subdivision and Development Guidelines (Appendix 1) for low impact design methods endorsed by mana whenua.*
- *Contaminated sites should be remediated. All contaminated material should be removed from the site and disposed of at a licensed facility.*
- *Measures to minimise earthworks should be considered at the design phase of development.*
- *Earthworks in areas with shallow depth to groundwater and/or over an aquifer can have significant cultural impacts and are of concern.*
- *The site should be surveyed by a suitably qualified person(s) to determine whether there are taonga species within the site that need to be protected.*
- *Refer to Ngāi Tahu Subdivision and Development Guidelines (Appendix 1) for guidance on stormwater, water supply and wastewater servicing.*
- *Note: The list of recommendations is preliminary, general/non-specific and non-exhaustive and is provided as preliminary guidance only.*

185. I note the following sites of significance to Māori (SASM) and other heritage listed items in the area:

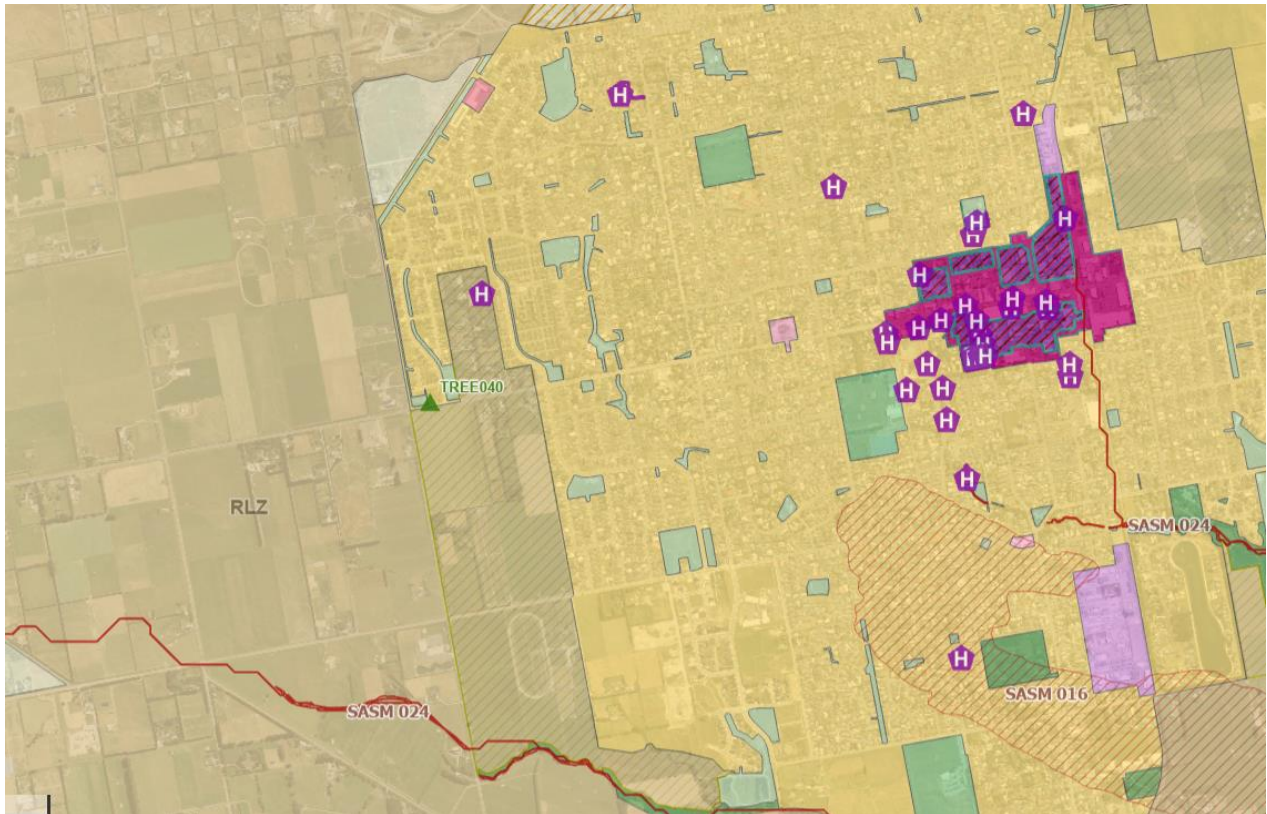


Figure 3 Cultural and heritage aspects in West Rangiora

186. There is one Ngā Wai SASM, SASM 024, associated with the Southbrook Stream. Ngā Wai SASMs identify “River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species”³⁰.
187. There is one significant tree – TREE 040 – but which is outside of an area proposed for rezoning, and HH listed item 114, which is the Former Rangiora Brick and Tile Works’ Hoffmann kiln (remains)³¹.
188. I note that provided that the Ngai Tahu Freshwater Policy and Mahaanui Iwi Management Plan considerations and requirements are implement through subdivision consenting design, Runanga do not consider themselves to be adversely affected by rezonings in this areas.
189. I note that the one SASM in the area would likely be better protected and enhanced in the extent covered by the development area in the event of a rezoning.

4.1.2 Matters raised by submitters (overall)

190. Survus Consultants Limited [250.4] seek the West Rangiora development area to be rezoned for urban development in order to achieve sustainable growth and development of the District, meet the requirements of the National Policy Statement on Urban Development 2020, and achieve the purpose of the Resource Management Act 1991. They seek to rezone the West

³⁰ <https://waimakariri.isoplan.co.nz/draft/rules/0/240/0/0/0/224>

³¹ <https://waimakariri.isoplan.co.nz/draft/rules/0/239/0/0/0/224>

Rangiora Development Area for urban development (General Residential Zone, or other appropriate zoning).

191. I respond to the overall submissions in line with the specific submissions.

4.2 South Block

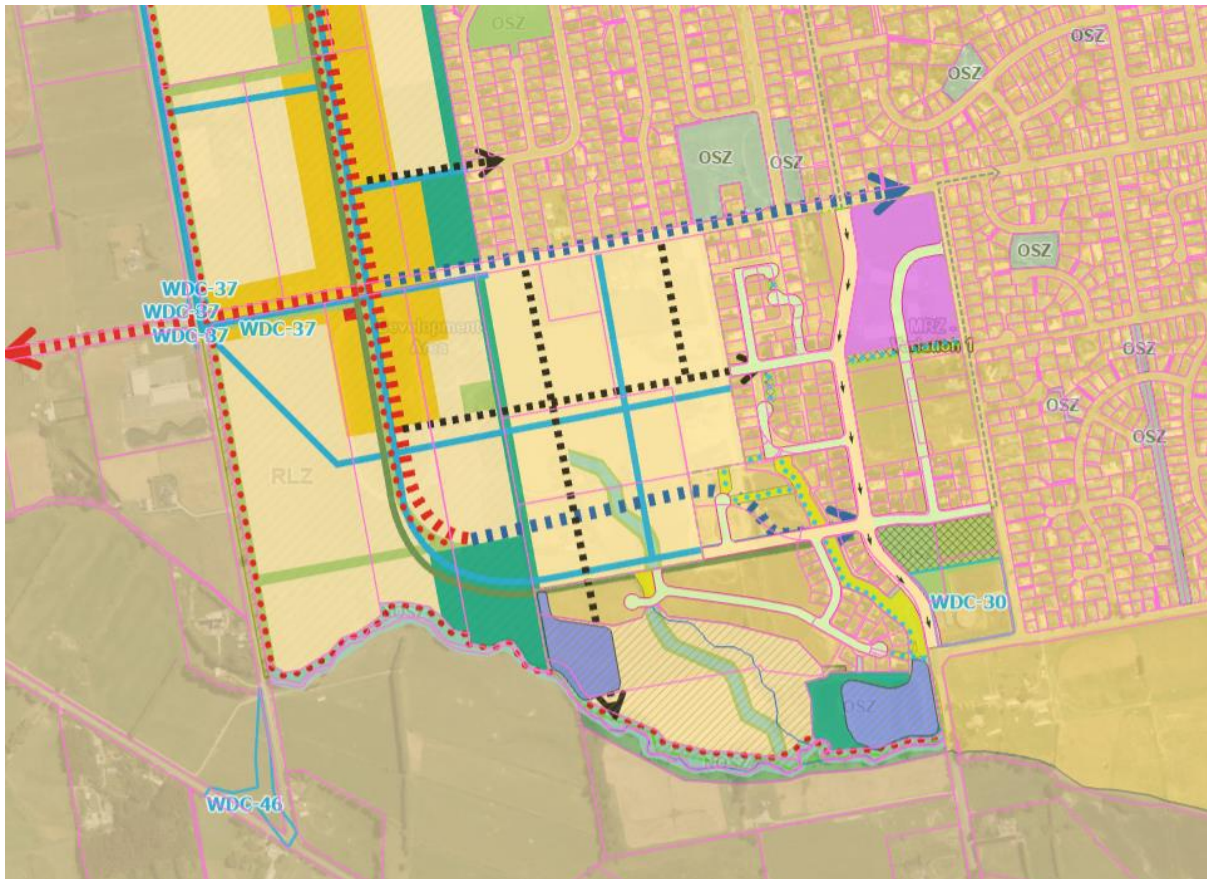


Figure 4 West Rangiora development area "South Block" (the shaded area above)

4.2.1 Description and Matters raised by submitters

192. The 36.1ha south block between Townsend Fields in the east, the Southbrook Stream in the south, Lehman's Road in the west, and Johns Road in the north is made up of the following parcels:

- Carolina Homes Limited – 1 block 6.58ha, 5.98 ha, 4.45ha, 4.52ha,
- 199 Johns Road Limited – 4.53 ha
- Townsend Fields Limited (check to see if this has already been rezoned?) – 1.51ha
- Skelley – 0.91 ha
- Allan Downs Ltd – 4.18 ha
- Robert Jack Paterson – 8.09 ha

- Bowden, Walsh, Campbell, Paterson section (Paterson Family Trust) – 7.89 ha
 - M & J Schluter – 12.36 ha
 - John and Coral Broughton – 4.03 ha
193. The primary active developer in this area, Townsend Fields Ltd, has dealt with the principal ODP requirements of infrastructure and roading layout at the plan level, but is progressing the development by way of consents for each individual block of land. The area of Townsend Fields Ltd activity is that shown by the Variation 1 overlay.
194. For the Townsend Fields area, the consents have largely superseded the operative and proposed zoning, but the land technically remains zoned as rural within the Operative District Plan, and proposed as rural lifestyle in the PDP, with a development area overlay, and a Variation 1 overlay.
195. The development area continues west of Townsend Fields, to Lehmans Road, and south to the Southbrook Stream.
196. All of the private landholders have submissions supporting the rezoning of their land.
197. 199 Johns Road et al [266.1] seek to rezone 163,191, 199, and 203 Johns Road, Rangiora to general residential zone and medium density residential zone, 200 lots or more.
198. John and Coral Broughton [223.1,223.14] seek to rezone 113 and 117 Townsend Road (8.4 ha) from rural lifestyle to general residential and medium density residential. The submitter seeks amendments to GRZ-P2 to enable the request.
199. This is opposed in part by McAlpines Ltd [FS 102] and supported by the R J Paterson Family Trust [FS 91] in further submissions.
200. Robert Jack Paterson [340.1] requests that the land in the West Rangiora development area is rezoned immediately. This is opposed in a further submission by FS Bellgrove Limited [FS 85].
201. Michael Culmer Skelley [297.1] supports development of the south side of Johns Road as a residential zone, as a landowner in this area. The R J Paterson Family Trust [FS 91] supports this in a further submission.
202. M & J Schluter [407.4], and part of their submissions already discussed in hearing stream 10A [407.1,407.2,407.3]³² request to rezone 237 Johns Road to general residential and medium density residential to release land to efficiently and effectively provide necessary housing development capacity. They also state that it is not necessary to hold back the release of FDAs to manage the release of residential development capacity.
203. This is opposed in a further submission by CIAL [FS 80], presumably in relation to the FDA component of their submission, and supported by R J Paterson Family Trust [FS 91] and FS Miranda Hales [FS 46].
204. I note that 20ha of the south block is proposed for rezoning under Variation 1, and also in some of the submissions above.

³² Noting that I responded to these in my Stream 10A Right of Reply, as my initial report had errors on these.

4.2.2 Assessment

Natural hazards, geotechnical, three waters

205. In respect of the overall area³³, Mr Aramowicz states:

- *The southern part of the ODP site is susceptible to flooding*
- *Given an earth bund and site filling would be needed to protect the south half of 237 Johns Road (s407) and all of 20/24 Angus Place (s233) and the south parts of 205 and 217 Johns Road, and the construction of a bund and filling within the main South Brook channel is likely to result in an increased flood hazard to other property, it is unlikely that these areas (i.e the southern parts of the West Rangiora Outline Development Plan Area) can be used for residential land use, however the land could be used for stormwater management purpose.*

206. In respect of the Ashley River breakout scenario, which occurs on part of the south block, from Mr Bacon³⁴.

- *As discussed, I have reviewed the proposal to rezone the land at 117 and 113 Townsend Road (now 20 and 24 Angus Place) in respect to the underlying flood hazard from an Ashley River Breakout.*
- *These properties are both under the flowpath from an Ashley River breakout and are shown as having significant areas of Medium Flood Hazard in both the 200 year and 500 year flood events. Under an Ashley River breakout scenario both parcels of land would be subject to significant flood velocities exceeding 1.0 m/s. Refer to Figure for the model results.*

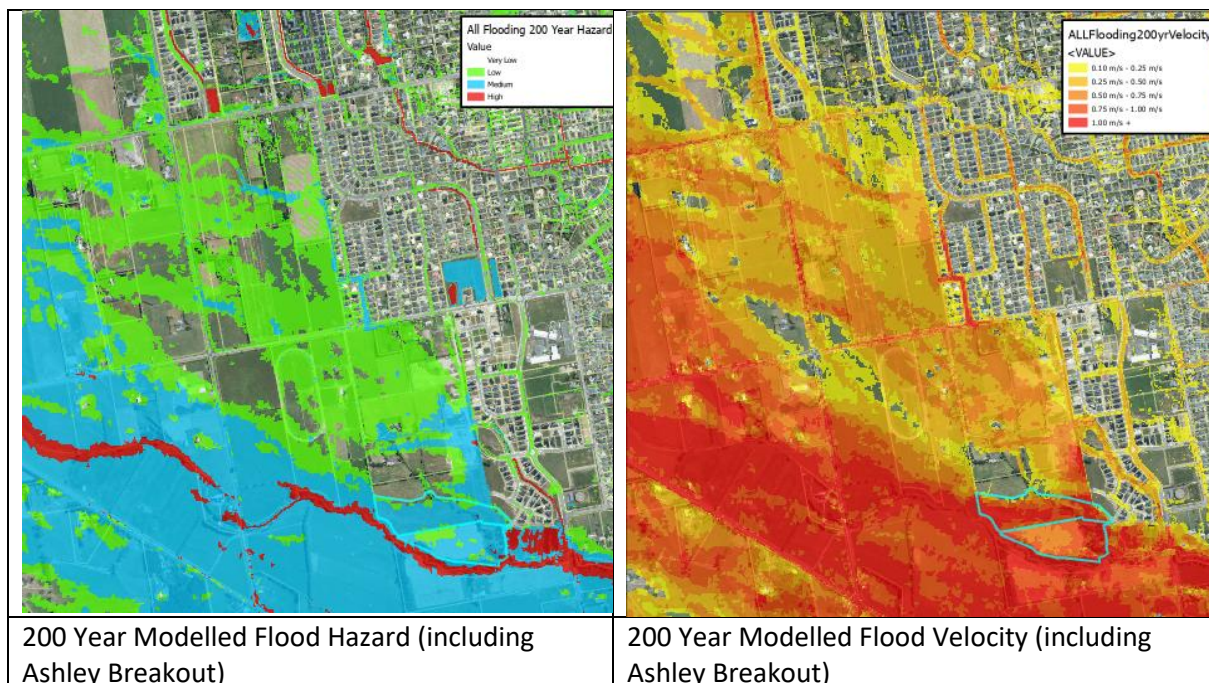


Figure - 200 year Model Results

³³ Mr Aramowicz, para 59 and para 76

³⁴ Memorandum of 12 July 2024

- *In my opinion it would be impractical to mitigate this flood hazard. Any attempts to raise the land or provide for a bund to the west would impact severely on neighbouring properties to the south and would represent an obstruction to the Ashley River Breakout pushing the primary breakout channel further south. Without better understanding the impacts of such works on these neighbouring properties and the larger flood channel it would be inappropriate in my opinion for the Council to support a residential rezoning request in this area.*
- *It is noted that Townsend Fields have previously undertaken works to mitigate a much smaller flood hazard to the north of these sites by constructing a temporary bund and diverting floodwater through this area. It is also noted that future plans to develop land east of Lehmans Road may also feature a bund to divert secondary flowpaths from the Ashley Breakout.*
- *The key difference with the Townsend Fields works and the future planned works along Lehmans Road is that it is mitigating secondary flowpaths from the breakout flow and diverting them back into the primary channel. Any works on the properties at 20 and 24 Angus Place would be interfering and diverting the primary flood channel.*
- *I also note that the dynamics of the flood hazard in West Rangiora is very different to the flood hazard in Northeast Kaiapoi. In the Northeast Kaiapoi area the flood hazard on the undeveloped land has been assessed as 'High' and is predicted to have much higher flood depths than those predicted in the West Rangiora area from the Ashley Breakout. The flood hazard in West Rangiora is largely due to fast moving water with moderate flood depths. However the flood hazard in Northeast Kaiapoi is largely due to deep ponding water with very low velocities from a combination of Localised Rainfall and Coastal Inundation.*
- *The proposed mitigation measures for Northeast Kaiapoi rely largely on simply raising the land and the effects from this have been assessed and demonstrated to be less than minor on the neighbouring properties. Recent construction of a new flood pumpstation by the Council under the Government's Shovel Ready programme has further helped in providing mitigation for these effects in Northeast Kaiapoi.*
- *The flood effects from partially obstructing and diverting the primary Ashley Breakout flood channel in West Rangiora have not been assessed.*

Transport

207. Council's transport engineering advice, from Mr Binder, is as follows:

- *I note that while the existing roading network would provide service for private motor vehicles generated by ad hoc development, I consider there is no appropriate walking or cycling infrastructure to connect ad hoc development to the existing walking/cycling network. By definition, this also applies to PT access, as new PT service is unlikely to occur for limited ad hoc development.*
- *I also consider that the medium density areas explicitly noted in the operative ODP are important to maintain as this density needs to be concentrated along a "primary road" in order to best create the demand for future PT service and walking and cycling facilities.*

Dispersed medium density development is not as efficient to service with new walking, cycling, or PT networks.

- I have reviewed the existing and future transport provision around 20 and 24 Angus Place (sections subdivided as part of the Townsend Fields development) as well as the South West Rangiora ODP. The ODP is excerpted below:

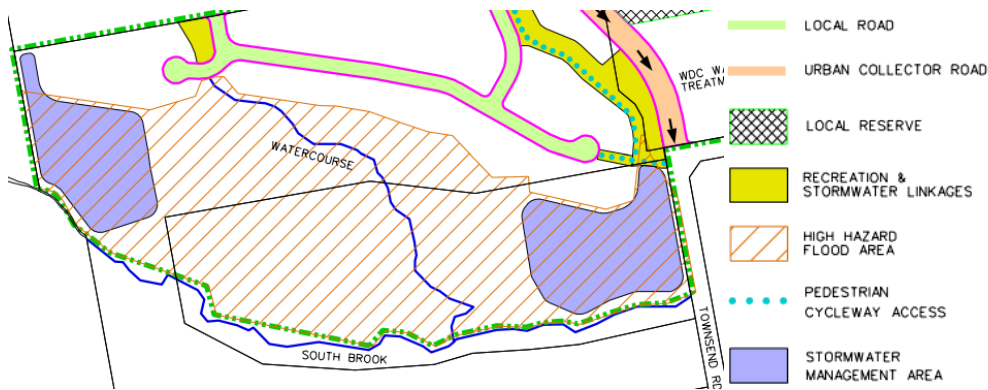


Figure 1: South West Rangiora ODP (excerpt)

- I note the land in 20 and 24 Angus Place was designated a “high hazard area” and the associated local road network was laid out without access across the tributary of the South Brook. I understand the master plan for Townsend Fields (last updated in 2021) generally adheres to the ODP roading network in this area, i.e., access across the tributary is chiefly cut off by residential sections, as shown below.



Figure 2: Townsend Fields master plan, 2021 (excerpt)

- I also note that the land to the south of the South Brook is zoned Rural and lays outside Rangiora’s Infrastructure Boundary. I consider that the land south of the South Brook tributary is not well-connected with the Townsend Fields development and will not likely be connected to any development to the south. As such, I consider intensified residential development in this area to be a poor outcome from a transportation perspective.

Greenspace

208. Mr Read’s advice on greenspace is as follows:

- The South-West Rangiora ODP area south of Johns Road is estimated to require a 0.6-hectare neighbourhood park reserve to service any future change to residential zoning and its anticipated residential population. The current rectangular park space shown on the ODP is shown as approximately 0.3ha in size. To be reliably indicative of requirements it

should be doubled in area. In terms of location, the park is appropriately located to serve future development.

- *Waimakariri District Council’s level of service guidelines for neighbourhood park access in urban and suburban areas require most residents to be within 500m, or a 10-minute walk, of a neighbourhood park; and 1.0ha of park space is to be provided per 1,000 residents (approx. 420 dwellings). In addition, the minimum viable size for a neighbourhood park is 0.3ha.*
- *Note that the recently developed Townsend Road Reserve (neighbourhood park) is not clearly identified on the ODP. The underlying resurveyed lot boundaries are shown, but the park space (the NW parcel) is not clearly distinguished (see attachment for an accurate depiction). This park is 0.9ha in size and has been accounted for in overall ODP park space provision.*
- *The remaining green spaces indicatively shown on the ODP are representative of the spaces and linkage connections expected.*

Urban design

209. I asked Mr Edward Jolly to update the overall ODP for the West Rangiora area to reflect the flooding issue, the additional park requirements (with catchment distances), and to show future land use on the Council block. Mr Jolly is a qualified and experience urban designer.

Applicant supplied expert evidence (in submission for 199 Johns Rd et al [266.1]

<u>Person/Organisation</u>	<u>Evidence type</u>
Mr Cameron Mars	Infrastructure
Firas Salman	Geotechnical
Jess Zollhofer	Contaminated Land
Kieran Stuart	Planning

Assessment of evidence.

Natural hazards

210. I consider that most of the area is at low risk of flooding, receiving between 0.10m to 0.25m of additional water, but there are areas of medium risk, with between 0.25m to 0.75m of additional water. Some of this is localised ponding, or secondary flow paths arising from the primary Ashley River breakout. As Mr Bacon states, there are mitigation options to ensure that water from secondary breakout paths is diverted around the development area to ensure that the water then enters back into the primary flow path.
211. There is a small area of high risk, within the Southbrook Stream channel and its immediate surrounds.
212. However, as explained by Mr Bacon and Mr Aramowicz above, the nature of the flooding in this area requires consideration. The southern part of the area is modelled to receive fast moving floodwaters in the event of a breakout and/or breach of the Ashley River flood protection scheme to the north west. Thus whilst the depths of the water are moderate, the speed of the water creates a different type of hazard from static ponding or slower moving waters.



Figure 5 Flood risk in West Rangiora

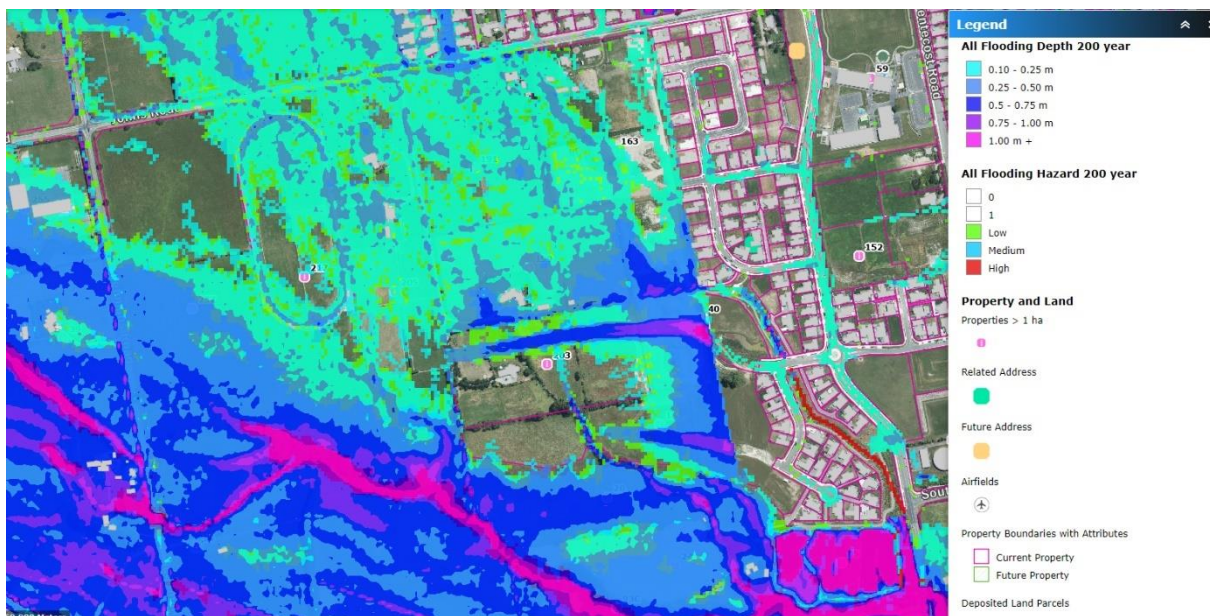


Figure 6 Modelled flood depth in West Rangiora

213. For the primary flow path itself, which is along and adjacent to Southbrook Stream, Mr Bacon considers that there are no practical mitigation measures. Mr Aramowicz also states this, noting that mitigation measures would likely result in displacement and thus further flood effects on land further south.
214. I consider that the notified ODP does not show this risk clearly for the areas adjacent to the Southbrook Stream, with some properties adjacent to the Southbrook Stream show on the PDP ODP with a future land use of general residential. The proposed rezonings in Variation 1 left this area out, for the reasons stated by Council engineers.
215. I note that for most of the lower lying areas, these are either proposed for stormwater management areas under the relevant ODP or blue-green linkages, or would become esplanade

reserves due to their adjacency to the Southbrook Stream. However, not all of the areas are classified as such, and as technical evidence on the flooding hazard considers that there are no practical mitigations for this risk, that I do not consider it can be rezoned as medium density residential.

216. However, as it may provide greenspace or stormwater capacity for the wider development, it may still be able to be rezoned. Even if I were to not recommend any rezonings, the land would remain as rural lifestyle, within the development area. I do not have scope to remove a development area overlay.

Greenspace

217. I agree with Mr Read that the size of the proposed neighbourhood park needs to be doubled from 0.3ha to 0.6 ha.

Transport

218. I agree with Mr Binder about the lack of specificity on cycleways and pedestrian access, particularly in the western part of the area. The eastern part of the area has two east-west shared roads and cycleways, but these do not continue to Lehmans Road in the west.

219. Mr Jolly has made the following design recommendations on these:

- A larger neighbourhood park in the existing location.
- Another neighbourhood park is located in the south west of the area.
- Extended east-west corridors that are multi-modal.
- A proposed drain alongside Lehmans Road.

220. Mr Jolly's changes are below that incorporate the above matters:

Figure 7 Recommended changes to the WR ODP

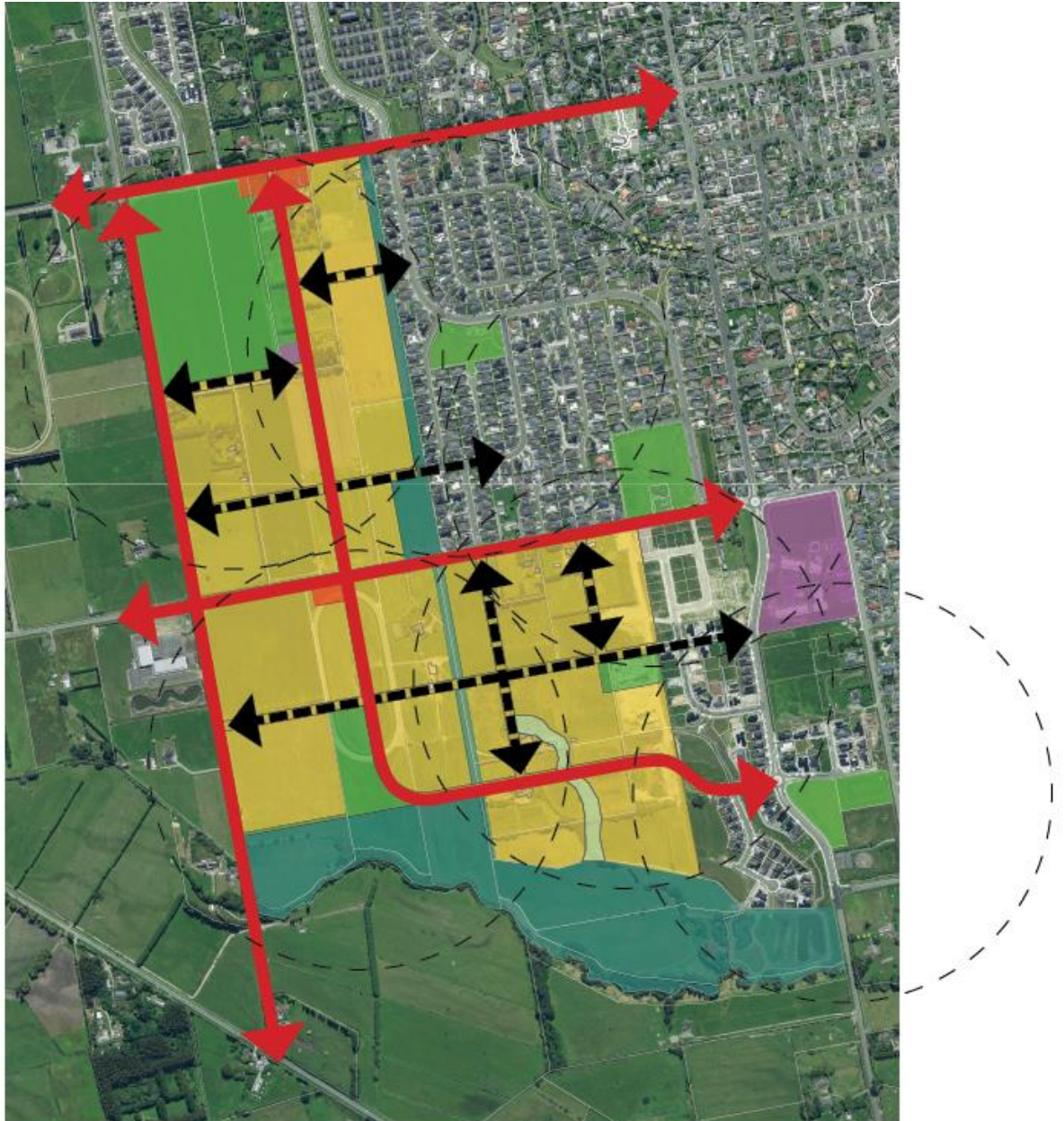


Figure 8 Proposed ODP changes

Opposition

221. This section is included to respond to the further submissions that are in opposition:

- McAlpines Ltd [FS 102]
- CIAL [FS 80]
- FS Bellgrove Limited [FS 85].

222. Bellgrove’s opposition appears related to the certification process, which I have provided recommendations on in section 14, following the recommendations for rezoning. I also note the late submission from Bellgrove to rezone Bellgrove South, rather than to rely on the certification process. As such, I consider that their opposition to this rezoning has now been superseded and is no longer relevant.

223. The McAlpine's opposition appears to be related to their reverse sensitivity concerns on developments adjacent to their sawmill at Southbrook. I have reviewed the JWS prepared by experts in relation to the McAlpine's noise matter, in particular Appendix A of the JWS that outlines where the 55dB noise contour would apply to, if recommended, and I note that the Broughton's land is not within this area. The Broughton's land is approximately 1km to the west, and well outside any 55dB noise contour. I do not consider that there is a noise issue on this land resulting from the sawmill's operation.
224. The CIAL opposition assumes that the Schluter land is within the remodelled airport noise contours as proposed in the CIAL submission [254], however, I consider this to be an error, as the site is not within, or near any identified airport noise corridors for Christchurch International Airport, nor the maps within Appendix C of their PDP submission.
225. This opposition has not been followed up in evidence by any of these further submitters. I recommend that these further submissions are rejected.

Overall considerations

226. I consider the rezoning submissions under interpretation pathway 2, which I consider requires me to assess how the CRPS gives effect to the NPSUD, on which I consider it provides broad and strong direction on what constitutes a well-functioning urban environment. As I also consider that this area, if rezoned, would provide significant development capacity in the context of Policy 8 NPSUD, I am then required to assess it against the CRPS provisions, albeit without the 'avoid' components of Objective 6.2.1 and Map A.
227. As the land is within an FDA, the primary test for rezoning on this land is CRPS Policy 6.3.12, with its specific tests that apply to the use of land within future development areas. Based on the evidence I have read:
- Almost all of the area is at low to moderate risk of flood hazard. As per the WDC published flood maps, there is a small component of high risk land but this relates to Southbrook Stream, and its immediate surrounds, which would become esplanade reserve following subdivision. However, as Mr Bacon explains, this moderate risk land is actually subject to a substantial and swift water flow, and is the primary channel of a breakout path for the Ashley River. There are no practical mitigation options for this part of the development area, certainly no options that would not result in displacement and creating another flooding hazard further south.
 - The other areas of low and moderate risk receive slower moving or static floodwaters, and mitigation options exist for these areas, provided the relevant finished floor levels are achieved.
- Provided that development occurs according to the recommended ODPs, it would achieve a consolidated and integrated urban form.
- Infrastructure can be efficiently and economically provided to it.
 - The blocks of land can be developed independently or as a collective, with good access from existing roads.
 - I note that the capacity tests in 6.3.12(1) are to provide for medium term demand only. However, in the context of an NPSUD, at least sufficient test, I do not consider that I am

limited to providing for medium term demand only, and can consider long-term demand. I note that I do not consider there to be a short to medium term shortfall in supply in the district.

228. I assess the scope for rezoning from the submissions below:

Submitter	Number	Land Included in submission	Zoning sought (or description of relief sought)
199 Johns Road et al	266.1	163,191, 199, and 203 Johns Road, Rangiora	General residential and medium density residential zone
John and Coral Broughton	223.1,223.14	113 and 117 Townsend Road	General residential and medium density residential
Robert Jack Paterson	340.1	212 Johns Road and 63 Oxford Road	Rezone the 'land in West Rangiora development area'
Michael Culmer Skelley	297.1	South side of Johns Road	As a residential zone
M & J Schluter	407.4	237 Johns Road	General residential and medium density residential
Survus	250.4	All of West Rangiora development area	General Residential Zone, or other appropriate zoning

229. I consider that there is scope to recommend upzoning of the entire south block, as all land within it is captured by a specific or general submission. All landowners in the block have requested rezoning as general residential, medium density residential, or just residential, and also noting the separate consideration of the land in the eastern part proposed for rezoning under Variation 1.

230. I note that the ODP for the area signals a mixture of general and medium density residential future land use, but mostly general residential.

231. Whilst this area is not surrounded by existing residential areas, except on the eastern boundary, I am conscious of the height difference permitted by the zones, and particularly in the context of the built form to the east which permits up to two-storeys, I recommend this integration matter to be considered in hearing stream 7.

232. For me, the more substantive matter is the allotment size, with the PDP medium density zone permitting 200m² allotments, versus 500m² for general residential. Noting the requirements in SUB-S3 to achieve a minimum density of 15 households per ha, except where demonstrated constraints occur, in which case, no less than 12 households per ha. I consider that the 500m² allotment limitation for the general residential zone would not enable this SUB-S3 requirement to be met, as a permitted activity.

233. I thus recommend the following:

- That the areas in the south block outside of the high hazard Ashley River primary breakout path are rezoned to PDP medium density residential, as shown on Mr Jolly's recommended ODP changes. For most of the blocks, this results in a partial rezoning to PDP medium density residential, with the remaining high hazard area recommended to be rezoned to open space reserve.
234. Consideration required John and Coral Broughton at 20 Angus Place, and Carolina Homes Ltd, at 24 Angus Place, all of the land is within the high hazard area, and as such, there needs to be a consideration of the most appropriate zone. Mr Jolly's ODP changes, on my advice, recommends that these two parcels could be rezoned to open space, but this is for the purposes of deriving an ODP only.
235. If this additional open space was not needed as part of the overall ODP land that is rezoned, this land could remain as rural (proposed for rural lifestyle). I note that:
- a substantial area of land has been set aside for open space and stormwater in the bottom of the blocks that are recommended to be rezoned
 - that open space is a restrictive zone, and not commonly held in private ownership, with Council usually taking these blocks of land.
236. Because of the current private ownership of 20 and 24 Angus Place, I am minded to recommend the following for these two properties:
- That these properties are not rezoned as PDP medium density residential (as per their submissions)
 - That these properties are not rezoned as open space
 - That these properties remain as rural (proposed for rural lifestyle under the notified PDP).
237. I thus recommend that the south block is rezoned to medium density residential.

4.2.3 Recommendations

238. That the following outcome for submissions occurs:
- John and Coral Broughton (20 Angus Place) [223.1,223.14] are **rejected**,
 - 199 Johns Road et al [266.1] is **rejected in part [in relation to Carolina Homes Ltd only]** (24 Angus Place)
 - Further submissions McAlpines Ltd [FS 102], FS Bellgrove Limited [FS 85], FS CIAL [FS 80], FS R J Paterson [FS 91] (in relation to John and Coral Broughton only) are **rejected**
 - 199 Johns Road et al [266.1], except Carolina Homes Ltd, Robert Jack Paterson [340.1], Michael Culmer Skelley [297.1], M & J Schluter [407.4], Survus Consultants Limited [250.4] are **accepted in part in relation to their medium density rezoning requests**
 - Further submissions R J Paterson Family Trust [FS 91], FS Miranda Hales [FS 46] are **accepted**

4.2.4 Plan-enabled capacity arising from this recommendation

239. This is an additional 48ha of gross area plan-enabled by the rezoning, however my conservative assessment of the ODP suggests that about 20 hectares are likely required for reserves, about 40% of the overall south block. This leaves about 28 hectares available for residential housing overall.
240. However, 20.6 ha of this area recommended for rezoning is already plan-enabled under Variation 1, and included as part of existing capacity calculations, so I have excluded this area from the additional future capacity calculation.
241. The additional area enabled by the rezoning and not included in existing capacity calculations is about 28 ha, of which about 40% (as above), or 11 ha would be required for reserves. This leaves about 17 ha for residential housing.
242. The median section sizes in Townsend Fields achieved to date has been 700m², which is larger than the average across the district however, I expect that the densities in this area would increase over time.
243. For a broad understanding of plan-enabled capacity based on this rezoning, I have calculated the following:
- A lower bound of 700m² lot sizes (what is being achieved now in Townsend Fields), resulting in about 243 additional lots.
 - I note that Townsend Fields is achieving larger lot sizes than most developments within the district at present.
 - An upper bound of 200m² lot sizes, reflecting an MDRS style section representing the most dense development monitored in the District to date, resulting in about 850 additional lots
 - An average, between the two scenarios, resulting in 546 lots.

4.2.5 Amendments

244. I recommend that the PDP is amended as follows, and as set out in Appendix A:
- That the planning maps for this area are changed to PDP medium density residential, excluding 20 and 24 Angus Place
 - That the ODP for the West Rangiora development area is otherwise amended according to Mr Jolly's design changes.
 - That the mapping errors for the Townsend Road reserve park are addressed, as stated by Mr Read

4.3 SWR dev area

4.3.1 Matters raised by submitters

245. The submissions are as listed above, primarily 199 Johns Rd et al.

4.3.2 Description

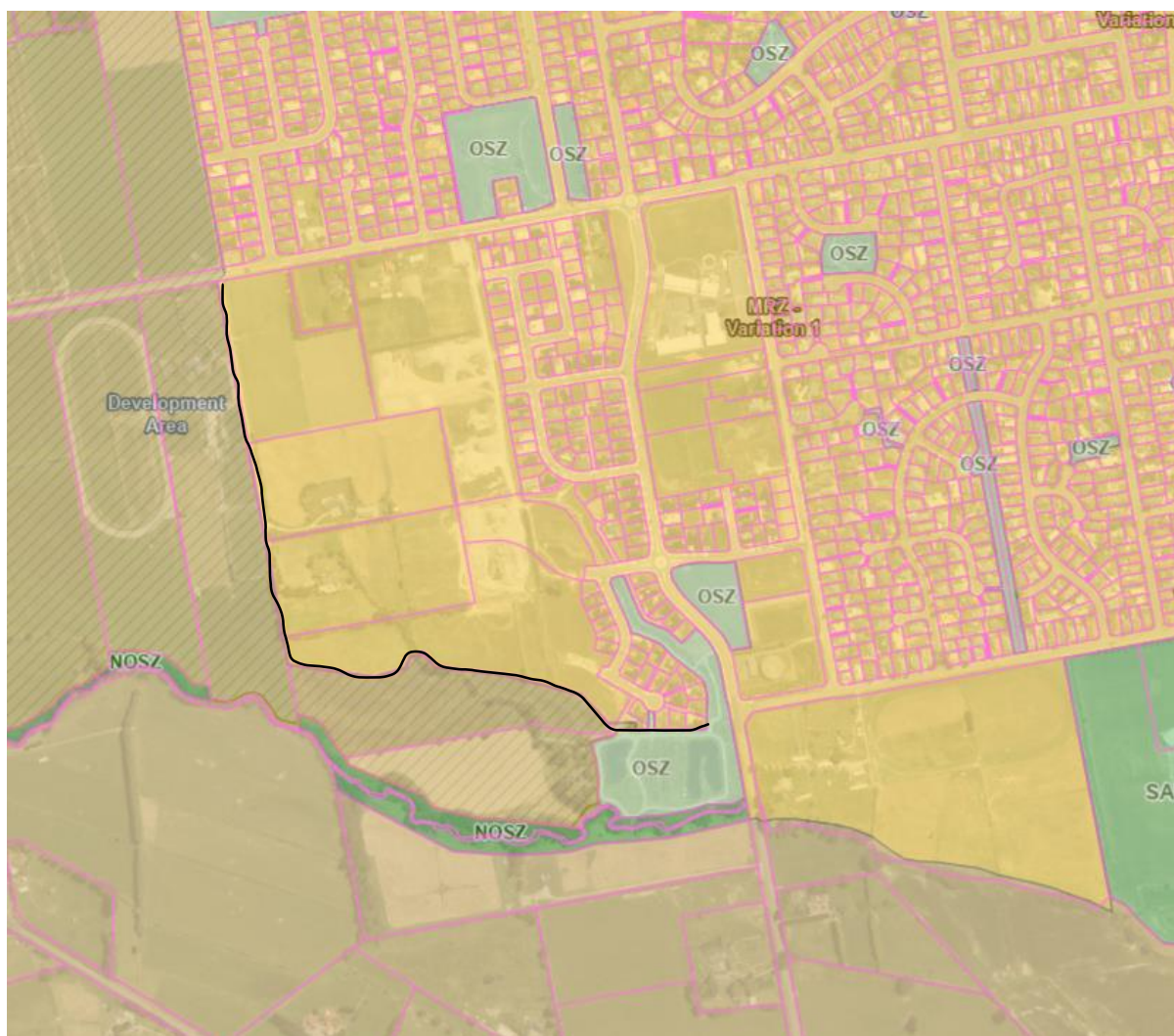


Figure 9 South West Rangiora development area (black line outlines the extent of the SWR development area delineation)

246. This is under active development, with it proposed for rezoning under Variation 1, and part of it is under active development (Townsend Fields), enabled by subdivision consent. Ms McKeever, for 199 Johns Road et al, has requested alignment of this area with the wider ODP.

4.3.3 Assessment

247. The submissions above on the wider south block also seek rezoning of this area in the context of the PDP. The land is the same as identified above.

248. Ms McKeever, for 199 Johns Road et al, and Townsend Fields (not a submitter, but the active developer in the area) has proposed an amended ODP³⁵ which reflects the current development. It is as follows:

³⁵ Email received Thursday 30 May 2024

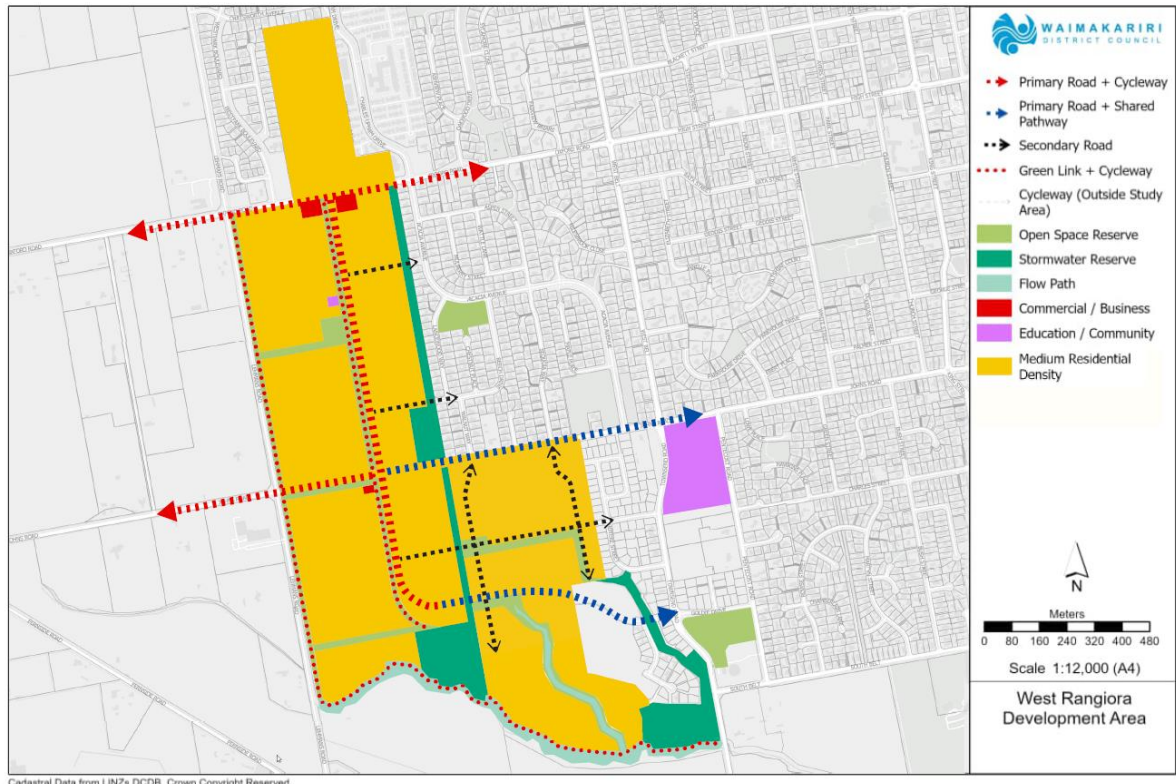


Figure 10 199 Johns Rd et al and Townsend Fields proposed updated ODP

249. 199 Johns Road et al supplied evidence in their PDP submission. Ms McKeever, for submitter has supplied this updated ODP to show the updated roading layout for Townsend Fields, and their extensions further west. I consider that the differences between it and the notified ODP are minor, and reflect the current roading layout approved in subdivision consents.

250. I thus agree with Ms McKeever, and have proposed the following:

251. I recommend that the land is rezoned to PDP medium density residential, with the following changes to the ODP:

- Minor adjustments to the roading layout in the ODP reflecting the current development pattern as approved in subdivision consents for Townsend Fields.
- A separate boundary showing demarcation from the wider WR dev area. This would be a black boundary around the part of Figure 12 that is shaded yellow, and a separate entry into the legend.

4.3.4 Recommendations

252. I recommend no changes from the recommendations for the South block, which provide scope for the consideration of this delineation for the South West Rangiora development area.

4.3.5 Plan enabled capacity arising from this recommendation

253. I note that this does not result in any additional future capacity over and above what is captured in the Land Uptake Monitoring Survey, as I consider that this area (within the Variation 1 overlay) is already plan-enabled and infrastructure ready, and thus “zoned” for the purposes of the NPSUD.

4.3.6 Amendments

254. I recommend the following changes to the West Rangiora ODP:

- Minor adjustments to the roading layout in the ODP reflecting the current development pattern as approved in subdivision consents for Townsend Fields.
- A separate boundary showing demarcation from the wider WR dev area, as the South West Rangiora (SWR) development area. This would be a black boundary around the part of Figure 9 that is shaded yellow, and a separate entry into the legend.

4.4 Middle Block



Figure 11 - West Rangiora development area "Middle Block" (the shaded areas to the west of Rangiora above)

4.4.1 Description and Matters raised by submitters

255. The 38.1ha middle block between Acacia Avenue in the east, Johns Road in the south, Lehmans Road in the west, and Oxford Road in the west. The land can be generally described as flat but has a slight fall from the northwest down to the southeast. It is made up of the following parcels:
- Dalkeith Holdings Ltd (212 Johns Road) – two blocks making up 18ha in total
 - Nick and Cilla Taylor (63 Oxford Road) – one block of 2.4ha
 - Alphonse and Elisabeth Sanders (83 Oxford Road) – one block of 2.4ha
 - Miranda Louise Hales (126 Lehmans Road) – one block of 5.5 ha.
 - Waimakariri District Council (89 Johns Road) – one block of 9.8ha
256. Alphonse and Elisabeth Sanders [118.1] seek to rezone the area to General Residential Zone to meet the demand for new houses. They oppose the movement network and maps in the WR³⁶ development area because the proposed new primary road from Oxford Road to Johns Road is unnecessary as there are already good roads serving the area, and consider that a straight new primary road will just become a race track. They request to amend the proposed movement network in the maps with no straight through road.
257. Nick and Cilla Taylor [298.1,298.2,298.3,298.4, 298.5,298.6] support future residential development to provide a range of housing opportunities as an urgent need and consider new residential activity in West Rangiora development area is appropriate. West Rangiora Development Area should be zoned General Residential Zone as there is demand now to develop this area for housing consistent with SD-O2. They request to rezone the West Rangiora Development Area to General Residential Zone.
258. Dalkeith Holdings [242.1] seek to rezone 212 Johns Road and 63 Oxford Road to general and medium density residential.
259. Miranda Hales [246.1] seeks to rezone 126 Lehmans Road to general and medium density residential.
260. All of the private landholders have submissions supporting the rezoning of their land. I understand that the Council land is held for the purposes of recreation.

4.4.2 Assessment

Natural hazards, geotechnical, three waters

261. Council engineering advice on these³⁷ is as follows:

- *There are no significant constraints that relate to natural hazards, geotechnical conditions, or the ability to provide stormwater, wastewater and potable water services to the site that would prevent the proposed GRZ and MDRZ land use.*

Transport

³⁶ WR presumably refers to “West Rangiora”

³⁷ Mr Aramowicz, para 59 and para 76

262. Council advice on transport is as follows, as stated by Mr Binder³⁸:

- *Whilst the existing roading network would provide service for private motor vehicles generated by ad hoc development, I consider there is no appropriate walking or cycling infrastructure to connect ad hoc development to the existing walking/cycling network. By definition, this also applies to PT access, as new PT service is unlikely to occur for limited ad hoc development.*
- *Considers that the medium density areas explicitly noted in the operative ODP are important to maintain as this density needs to be concentrated along a “primary road” in order to best create the demand for future PT service and walking and cycling facilities. Dispersed medium density development is not as efficient to service with new walking, cycling, or PT networks.*

Parks and greenspace

263. Council advice on parks and greenspace is as follows, as stated by Mr Read:

- *Approximately 0.7ha will be required for a neighbourhood park, in the south east corner of the Council owned land at 89 Oxford Road.*
- *Green linkages and stormwater management areas are in addition to this [not counted within the 0.7 ha].*

Urban design

264. Council obtained expert advice from Mr Edward Jolly:

- *Green space provision in the ODP is relatively limited and sparsely distributed through the area. The provision of open spaces is considered minimal both in terms of quantity and size. It is recommended that more substantial open space provision is provided within the ODP. Figure 2 below illustrates potential improvements to the ODP in terms of allocation of open space, size and distribution. Note the dashed circles in the diagram represent walking catchments of 400m or a 5 minute walk suitable for medium to large openspace. The key recommendations for additional openspace provision include:*
- *A large recreational space in the northern extent of the ODP between Oxford Road and the first east-west secondary road to replace the proposed pocket park adjacent to the spine road. It is also recommended that the community facility (purple square) is better integrated with the open space rather than separated by residential development.*
- *A larger openspace in the southwest quadrant to replace the pocket park in this location, allowing greater coverage and access for future residential development.*
- *An additional openspace on the important east west secondary street connection between Te Matauru Primary School and Lehmans Road.*

Applicant supplied expert evidence

<u>Person/Organisation</u>	<u>Evidence type</u>
Mr Ivan Thomson	Planning
Mr Steven Roberts	Geotech

³⁸ Mr Binder, pg 1 and pg 2

Discussion

265. Nick and Cilla Taylor raised questions about the ODP layout, with its rectilinear roading layout potentially causing traffic safety issues, a “racetrack” as described in their submission. In considering this, I note that the final layout of roads is determined at subdivision consent stage, and that the rectilinear layout on the PDP ODP is primarily to show axis and broad locations for connections. I note that the pattern of roading in surrounding subdivisions is curvilinear, which if this pattern was replicated in the middle block, would probably resolve the submitters’ concerns. I also note Mr Binder’s general concerns about straight four-way intersections and his general design recommendations to avoid these if at all possible.
266. As stated above in the south block section by Council engineers, whilst the south block receives the highest water depth, the most cost-effective engineering options for reducing some of the potential effects on the south block are with engineering works on the middle block. Thus, there is an interest from the south block landowners and developers (Townsend Fields, 199 Johns Rd et al) in how the land in the middle block can offer solutions.
267. Three options have emerged from discussions with Ms McKeever for 199 Johns Road et al:
- Option 1 – on site or near site flood protection measures that significantly reduce localised water depth in flood events on the site, and provide some but not complete mitigation of an Ashley River breakout scenario.
 - Option 2 – a proposed secondary bund on the Ashley River, in the vicinity of the Rangiora airport and Rangiora racecourse, costing about \$15M that provides additional protection. This bund is proposed for inclusion in the ECan long term plan 2024-2034, and would avoid this risk entirely.
 - Option 3 – both options, noting that Option 1 is largely outside of the scope of the district plan review process.
268. The localised flooding risk on land to the north of Oxford Road was mitigated by the construction of a moderate depth swale drain along Lehmans Road (shown below), and I consider that if this was extended down Lehmans Road to Southbrook Stream, it would intercept much of the water entering the site. I consider that there is sufficient space in the Lehmans Road corridor for this drain to be constructed. I discussed the sizing and nature of the drain with the submitter and landowner, Ms Hales, who has expressed a preference for something that did not constrain access or views to her property, which is proposed for rezoning. This would indicate a preference for depth and width, rather than height. The ODP also proposes another drain on the eastern edge of the block, on the Dalkeith land, and I would suspect that the same limitations on height may apply here as well. It may be that both drains are required, or one drain, however, the outcome should be to be able to add flood capacity and is independent of what might happen with Option 2 – the proposed ECan secondary bund to the north.
269. Noting the request for a height limitation on any Lehmans Road drain expressed by the current landowner and submitter, the exact sizing and design of the drains would be subject to engineering advice, and would happen at the time of subdivision consent, including potentially subdivision consent for land that is removed from the submitter, such as Townsend Fields.



Figure 12 Current Lehmans Road swale drain (adjacent to Westpark)

270. My understanding of the technical evidence and reports is that the ECan Ashley River secondary stop bank, if built, provides area-wide protection, extending well north and south of the West Rangiora new development area. However, this project is still subject to consultation, approval, and design before being built, and I do not consider that decisions on rezoning should be contingent upon it, and the Council engineering advice on flooding hazards on the specific site is also not contingent upon it being built, as the risk is low to moderate even without any further mitigation works
271. Council engineering advice indicates no engineering issues which would prevent the land from being rezoned as medium density residential. There are also no servicing issues.

Council block (9.8 ha)

272. The Waimakariri District Council is not a submitter, and has not sought rezoning of the land that it owns. The ODP indicates general residential and medium density residential land uses for this land. Mr Read has stated that additional land may be needed for parks and reserves, including further community or greenspace, with some of this block becoming residential. As such, I am recommending that the Council block appears in the ODP with shading to outline these potential twin future land uses, but the final extent of future land use for community and greenspaces uses has yet to be determined by Council in its landowner function.
273. Mr Jolly has noted the requirement for additional parks, and I also note that the exact nature of the final land use of the Council block has not yet been determined. I do not consider that all of it is required for parks or greenspace, but that all of it is suitable for medium density housing if required.
274. Mr Jolly has thus supplied amendments to the ODP that show these future options in respect of this land:

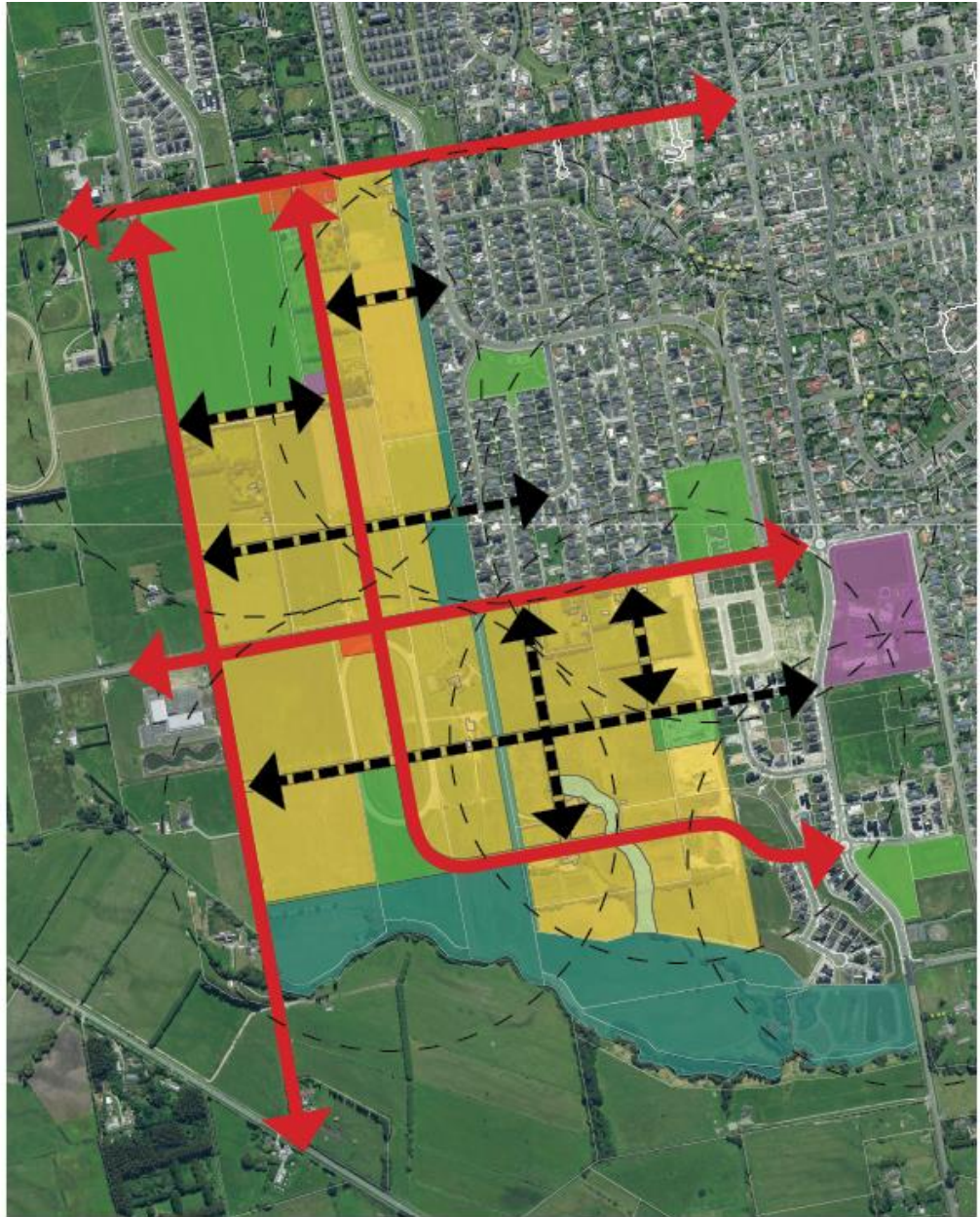


Figure 13 Proposed amendments to WR and SWR ODP

Overall assessment

275. I consider the rezoning submissions under interpretation approach 2, which I consider requires me to assess how the CRPS gives effect to the NPSUD, on which I consider it provides broad and strong direction on what constitutes a well-functioning urban environment. As I also consider that this area, if rezoned, would provide significant development capacity in the context of Policy 8 NPSUD, I am then required to assess it against the CRPS provisions, albeit without the avoid components of Objective 6.2.1 and Map A.

276. As the land is within an FDA, the primary test for rezoning on this land is CRPS Policy 6.3.12, with its specific tests that apply to the use of land within future development areas:

- The area is at low to moderate risk of flood hazard.
- Provided that development occurs according to the recommended ODPs, it would achieve a consolidated and integrated urban form.
- Infrastructure can be efficiently and economically provided to it.
- The blocks of land can be developed independently or as a collective, with good access from existing roads.
- I note that the capacity tests in 6.3.12(1) are to provide for medium term demand only. However, in the context of an NPSUD, at least sufficient test, I do not consider that I am limited to providing for medium term demand only, and can consider long-term demand. I note that I do not consider there to be a short to medium term shortfall in supply in the district.

277. I assess the scope for rezoning from the submissions below:

Submitter	Number	Land Included in submission	Zoning sought
Alphons and Elisabeth Sanders	118.1	Whole of development area	General residential
Nick and Cilla Taylor	298.1,298.2,298.3,298.4, 298.5,298.6	Whole of development area	General residential
Dalkeith Holdings	242.1	212 Johns Road and 63 Oxford Road	General residential and medium density residential
Miranda Hales	246.1	126 Lehmans Road	General residential and medium density residential
Survus	250.4	All of West Rangiora development area	General Residential Zone, or other appropriate zoning

278. I consider there is submission scope for upzoning the area.

279. I note that the ODP for the area signals a mixture of general and medium density residential future land use, and two submitters specifically seek medium density residential zoning on the properties that the ODP anticipates medium density residential zoning on. However the other properties that the ODP proposes medium density for have not specifically sought it in their submission.

280. The primary difference between general residential and PDP medium density residential is height³⁹ and allotment size. General residential is 8m, or two storeys, and PDP medium density residential is three storeys. Whilst this area is not surrounded by existing residential areas, except on the eastern boundary, I am conscious of the height difference permitted by the zones, and particularly in the context of the built form to the east which permits up to two-storeys, I recommend this integration matter to be considered in hearing stream 7.
281. For me, the more substantive matter is the allotment size, with the PDP medium density zone permitting 200m² allotments, versus 500m² for general residential. Noting the requirements in SUB-S3 to achieve a minimum density of 15 households per ha, except where demonstrated constraints occur, in which case, no less than 12 households per ha. I consider that the 500m² allotment limitation for the general residential zone would not enable this SUB-S3 requirement to be met, as a permitted activity.
282. I thus recommend that the middle block is rezoned to PDP medium density residential.
283. That the ODP for West Rangiora is amended according to Mr Jolly's design changes.
- A stormwater drain along Lehmans Road stormwater drain is added (as per Mr Jolly's changes).
 - Narrative text explaining this stormwater provision is added

4.4.3 Recommendations

284. That the following outcome for submissions occurs:
- Alphons and Elisabeth Sanders [118.1], Dalkeith Holdings [242.1], Miranda Hales [246.1], Survus Consultants Limited [250.4] are **accepted**
 - Nick and Cilla Taylor [298.1,298.2,298.3,298.4, 298.5,298.6] is **accepted in part**

4.4.4 Plan-enabled capacity arising from this recommendation

285. This is an additional 38.1ha of gross area plan-enabled by the rezoning, however I note:
- I have excluded the Council block of 9.8ha from the calculation as the exact nature of its future land use cannot be determined at this time. I have included this additional land in a ca
 - My conservative assessment of the ODP suggests that about 4 hectares are likely required for greenspace, including blue-green links, drains and SMAs.
 - New developments in the district that require new roads has resulted in roading areas within the developments ranging between 18%-25% of total land for roading⁴⁰. Using an average of these, I have assessed that 21% of the land would be required for roading, which is 6ha.

³⁹ Built form standard GRZ-BFS4 sets 8m, or two storey, height limits, except for on large sites above 6000m² where 12m, or three-storey, with at least a 10m setback.

⁴⁰ As per my assessment of overall capacity and uptake in this report

- Thus the reserve requirements on the middle block are about 10ha, of a total of 28.3 ha, making for 18.3 ha of land I can currently assess for potential plan-enabled capacity following the rezoning recommendation.
- As with the south block, I have assessed a lower bound of 700m² lot sizes and an upper bound of 200m² lot sizes.
- A lower bound of 700m² lot sizes (what is being achieved now in Townsend Fields), resulting in about 366 additional lots
- An upper bound of 200m² lot sizes, resulting in about 915 additional lots
- An average, resulting in 641 additional lots

4.4.5 Amendments

286. I recommend that the PDP is amended as follows, and as set out in Appendix A:
- That the planning maps are changed to rezone the middle block to PDP medium density residential
 - A stormwater drain along Lehmans Road stormwater drain is added (as per Mr Jolly's changes).
 - Narrative text explaining this stormwater provision is added

4.5 North Block/Brick Kiln Lane block

4.5.1 Matters raised by submitters

287. Kenneth Murray Blakemore [319.1,319.2], the landowner at 3 Brick Kiln Lane seeks to rezone Brick Kiln Road as residential rather than rural with a future development area overlay. He is the owner of, and has previously run livestock at 3 Brick Kiln Lane however considers that this is not compatible [given the proximity] to the town centre and surrounding housing. He would like to subdivide and develop 5,000m² of the property. He requests to rezone Brick Kiln Road from Rural Lifestyle Zone to residential now, rather than in the future.
288. This is supported in a further submission from himself, Ken Blakemore [FS 129].
289. Ruth and Bruno Zahner [213.1] seek to rezone 70 Oxford Road to general residential zone. The Zahner's are the former owners of this property, but the property has since been sold to the current owner/develop, Mr Ben Dormer/Fusion Homes Limited.
290. Ben Dormer, the owner/developer of the site is a submitter on Variation 1, seeking that this site is rezoned. He does not have a corresponding PDP submission, however that corresponding submission is that of the previous owner, Ruth and Bruno Zahner [213.1]. Mr Dormer's submission on Variation 1 cannot be considered in the context of the PDP.
291. However, Mr Dormer does have a lodged resource consent application seeking to develop 70 Oxford Road, within the Brick Kiln Lane area. This consent application, under the operative

district plan, cannot be assessed in the context of the PDP or V1 on its own, however, if granted, it would form part of the existing environment.

292. There are no other submissions, or further submissions from landowners or others seeking rezoning of the Brick Kiln Lane area.

4.5.2 Description

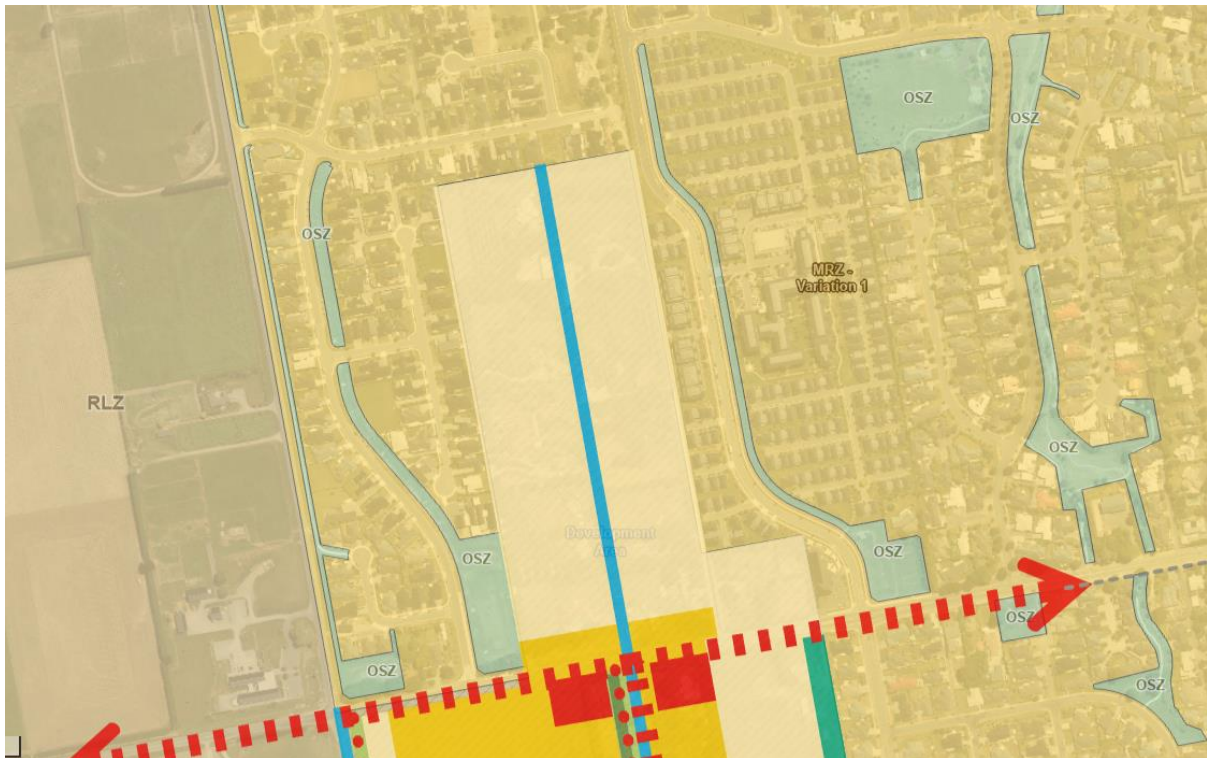


Figure 14 Brick Kiln Lane (the block of solid colour land in the centre)

293. The north block is commonly referred to as Brick Kiln Lane, due to the prominent feature of the area being an old pottery brick kiln and the lane itself. The land is “generally described as flat but has a slight fall from the northwest down to the southeast”⁴¹. It consists of a private access off Oxford Road, servicing about 10 parcels of about 1ha in size. It is an enclave of rural land surrounded on three sides by residential zoning, and the reason for it remaining thus far as rural land has been lack of intention of existing landowners to develop to date, and the issue of the deeds land. Also, the two private accesses are narrow and are not capable of servicing a greater traffic volume, and any greater traffic volume entering Oxford Road may present a hazard. Transport engineering advice is that any intersection work at this location, such as a roundabout, is too close to the adjacent intersection at Acacia Avenue/Charles Upham Drive. Any new transport access for the blocks would need to come from Charles Upham Drive through the property at 29 Brick Kiln Lane.

⁴¹ Mr Aramovicz, para 26

294. 70 Oxford Road, which forms the south-eastern corner of this block is also subject to a land use and subdivision resource consent application from Ben Dormer/Fusion Homes Ltd⁴², enabling up to 15 residential lots, including the existing dwelling, as follows⁴³:

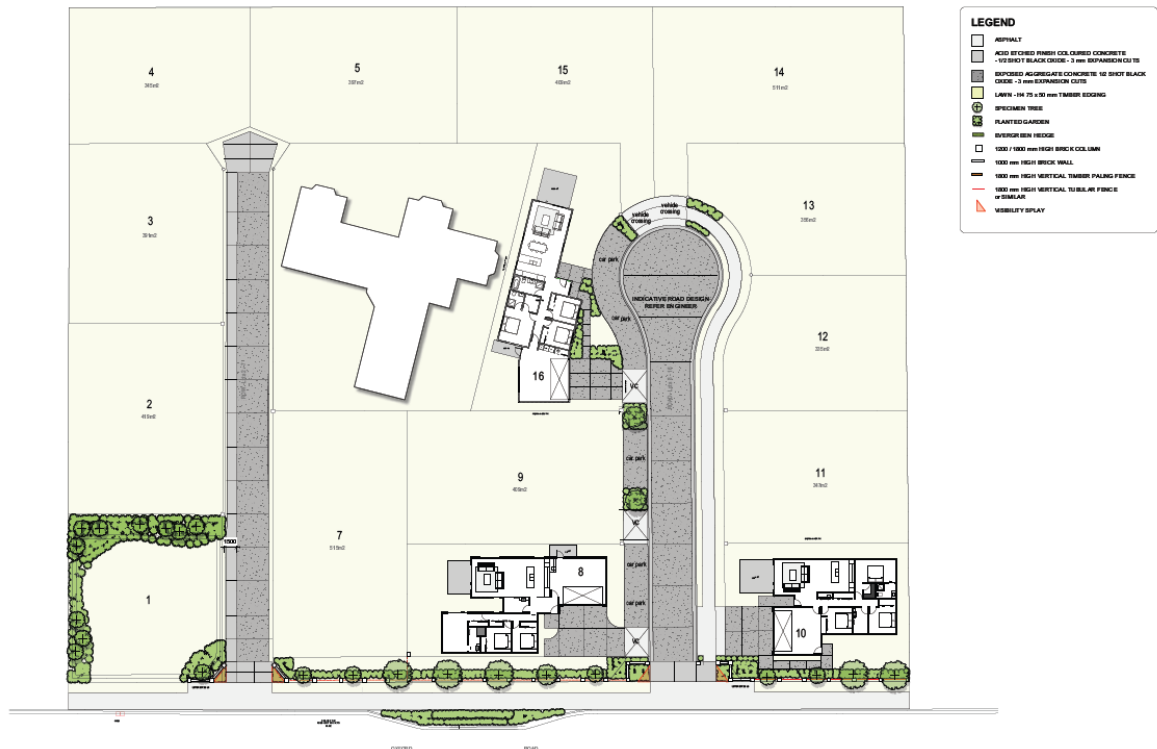


Figure 15 70 Oxford Road proposed layout

295. The block is currently serviced with reticulated wastewater from a pipe along Brick Kiln Lane, and with reticulated water from Oxford Road. If residential development was to occur on this site, there are no capacity restrictions within the network, although individual connections would need to be upgraded or replaced. Stormwater is currently disposed of on site.

4.5.3 Assessment

Natural hazards, geotechnical, three waters

296. Council engineering advice on these matters⁴⁴ is as follows:

- *There are no significant constraints that relate to natural hazards, geotechnical conditions, or the ability to provide stormwater, wastewater and potable water services to the site that would prevent the proposed GRZ and MDRZ land use.*

Transport

297. Mr Binder's recommendations on transport matters⁴⁵ are as follows:

⁴² As of the time of writing, this subdivision consent is still being processed

⁴³ Lot 1 on this subdivision plan may be needed for a stormwater management area

⁴⁴ Mr Aramowicz, paras 27-30

⁴⁵ Mr Binder, pg 1

- *Considers it critical to implement an ODP for this area to manage infrastructure development over the individual lots that make up the entire site, noting that they may be intensified at different times, and do not all have direct road access to Oxford Road.*
- *In order to preserve the priority of Oxford Road as a strategic road, do not create any additional accesses onto Oxford Road. Instead, connect Brick Kiln Lane to existing local roads.*
- *Coordinate development of 70 Oxford Road, which has an active resource consent application, with the wider Brick Kiln Lane block*
- *Notes that there is no provision for an arterial transport route north of Oxford Road.*

Parks and greenspace

298. Council advice on parks and greenspace is as follows:

- *Waimakariri District Council already has more than adequate Neighbourhood Park category green space to meet its level of service requirements for residents of the NW Rangiora area between West Belt and Lehman's Road north of Oxford Road. Waimakariri District Council's level of service guidelines for neighbourhood park access in urban and suburban areas require most residents to be within 500m, or a 10-minute walk, of a neighbourhood park; and 1.0ha of park space is to be provided per 1,000 residents (approx. 420 dwellings). In addition, the minimum viable size for a neighbourhood park is 0.3ha. Other than stormwater and drainage related green space reserves, the only community green space required within the Brick Kiln Lane ODP area is provision of recreation and/or ecological linkages to facilitate non-motorised off-road connectivity (internal and external), landscape amenity and opportunities for resident social interaction.*

Discussion of 70 Oxford Road resource consent application

299. For 70 Oxford Road The land use and subdivision consent is non-complying under the Operative District Plan, as it is seeking a higher density than the 4ha minimum lot size in the rural lifestyle zone.

300. I consider that the primary challenges with the block are as follows:

- The risk of a proliferation of accessways onto the arterial Oxford Road. The 70 Oxford Road consent ODP has two accessways, each within 90m² of the existing intersection at Charles Upham Drive. This is on top of the existing (private) accessway into Brick Kiln Lane itself. A development of the wider block could result in more accessways onto Oxford Road, within 125m of the intersection with Charles Upham Drive, and whilst a greater density of intersections is possible under the PDP provisions through a consent⁴⁶, it may not represent good urban form, and could create a safety and congestion issue. I am also conscious that if the land to the south is rezoned, that will be further accessways onto Oxford Road in this block.
- The need to integrate the block with the surrounding land. The best connections are to Westpark Boulevard to the west, most likely through the small park (zoned as open space

⁴⁶ The minimum permitted activity separation distance between accessways that create intersections on for Oxford Road is 125m⁴⁶, under rule TRAN-R4 and TRAN-S2.

reserve), and to Charles Upham drive to the north east. Council has retained a parcel of land in anticipation of a connection here, however, any connection needs to cross private land.

- The primary access through the block is an informal right of way known as “Brick Kiln Lane” that, whilst surveyed, is still under the deeds registration system, not in Torrens title and the Land Transfer Act system. As I understand it, no descendants of the last known owner have been located. As the road entitled ‘Brick Kiln Lane’ will need to be legalised and widened to enable access through the block, this issue will need legal resolution before any development can begin. The right of way is maintained and used by the surrounding land owners on an informal basis, and also by Council to provide services to this block, and surrounding blocks. If this accessway is used as the main accessway into the wider block of land, the land issue will need to be resolved.
- A future stormwater system for the site may be reliant on developments on the south side of Oxford Road, to pass the water down to Southbrook Stream, if stormwater is not disposed of onsite.

301. I requested potential transport options from Mr Edward Jolly, which identifies two options for transport layout, to avoid or mitigate the above issues:

Approach 1



Figure 16 Brick Kiln Lane - Option A

Approach 2



Figure 17 Brick Kiln Lane - Option B

302. These designs address transportation issues on the site, preventing a potential proliferation of accessways onto Oxford Road. Under both ODP options, there would be up to an additional three accessways onto Oxford Road, assuming that the 70 Oxford Road development occurs. Option A avoids the land issue on the accessway by placing a road through the centre of the block, as well as being equal on the adjacent properties. Option B uses a widened version of the existing access through 'Brick Kiln Lane', curving east to join Charles Upham Drive. Option A currently exits through undeveloped private land onto Chatsworth Avenue, however, if this is not possible, a connection east to Charles Upham Drive would be possible, as per Option B. Both options have a western connector to Westpark Avenue. Both options place an access restriction along Oxford Road.
303. I prefer Option A, as it spaces out the connections onto Oxford Road, aligns future roading with current parcel boundaries as much as possible⁴⁷, as well as avoiding the legal issue with the current accessway land.
304. I note that under CRPS policy 6.3.3 – outline development plans, it is only the principal through roads that would be required on any plan-level ODP. Thus, the individual property connections shown above would not be needed on any final ODP. They exist above to show that connections to each individual block on the basis of the principal street layout are available.

Overall assessment

⁴⁷ The slight eastward deviation in the Option A proposed north-south road is to avoid an existing dwelling and to connect with an undeveloped parcel of land, owned by Three Cats Investments Ltd.

305. I assess the scope for rezoning from the submissions below:

Submitter	Number	Land Included in submission	Zoning sought (or description of relief sought)
Blakemore	319.1,319.2	3 Brick Kiln Lane, all of Brick Kiln Lane	“Residential”
Zahner	213.1	70 Oxford Road	Submission seeks GRZ or MDRZ
Survus	250.4	All of West Rangiora development area	General Residential Zone, or other appropriate zoning

306. I consider that on the basis of the submissions above, there is scope to assess PDP medium density residential zoning as the limits of any upzoning in the area. General residential zoning is also an option.

307. I consider that given that the Brick Kiln Lane area is within the development area overlay, that it is surrounded on three sides by residential developments, with new developments soon to occur (at 70 Oxford Road), easily serviceable, and with two submissions seeking rezoning of all or part of the block, that the area should be rezoned from general rural to medium density residential. As developments increase in the area, any remaining rural and/or rural lifestyle activities in the area are likely to face reverse sensitivity and boundary issues. Whilst development may not occur immediately, I consider that landowners in the area would benefit from the certainty of knowing the future land use for their properties, and make decisions accordingly.

308. I am conscious that whilst Ken Blakemore has requested rezoning of the whole area, he is the only landowner in the wider block to submit on the proposal, and it would be challenging for his land to be rezoned alone because of the access issues. Development at Brick Kiln Lane requires a collective approach, in accordance with any ODP, which becomes more likely once the future zone and ODP is confirmed. However, I do not expect it to be the first of the rezoned blocks in West Rangiora to develop.

309. I consider that the block provides significant development capacity, particularly in the context of NPSUD Policy 8, and also contributes to a well-functioning urban environment. As it is within an FDA, and the projected infrastructure boundary, I consider it to be part of the anticipated urban environment.

310. The primary test for rezoning on this land is CRPS Policy 6.3.12, with its specific tests that apply to the use of land within future development areas:

- The area is at low to moderate risk of flood hazard.
- Provided that development occurs according to the recommended ODPs, it would achieve a consolidated and integrated urban form.
- Infrastructure can be efficiently and economically provided to it.

- The land is most efficiently developed as a single block.
 - Whilst there are multiple potential developers and developments within the area, arising from the multiple landownership, inefficiencies arising from staging are unlikely to arise as the area is long and relatively narrow, and can be well-serviced by a principal road, which provide access across it independently of private land.
 - I note that the capacity tests in 6.3.12(1) are to provide for medium term demand only. However, in the context of an NPSUD, at least sufficient test, I do not consider that I am limited to providing for medium term demand only, and can consider long-term demand. I note that I do not consider there to be a short to medium term shortfall in supply in the district.
311. I consider that the two upzoning options to test are general residential or PDP medium density residential. I note that the ODP for the area signals a general residential future land use.
312. The primary difference between general residential and PDP medium density residential is height⁴⁸ and allotment size. General residential is 8m, or two storeys, and PDP medium density residential is three storeys. The surrounding residential areas to Brick Kiln Lane are mostly single storey, but the PDP permits up to two storeys. However, the height standards for the various zones and any need to integrate across them is still to be considered in hearing stream 7, so I do not consider a height difference to be determinative at this stage.
313. For me, the more substantive matter is the allotment size, with the PDP medium density zone permitting 200m² allotments, versus 500m² for general residential. Noting the requirements in SUB-S3 to achieve a minimum density of 15 households per ha, except where demonstrated constraints occur, in which case, no less than 12 households per ha. I consider that the 500m² allotment limitation for the general residential zone would not enable this SUB-S3 requirement to be met, as a permitted activity.
314. I recommend the submission of Ruth and Bruno Zahner, and Kenneth Murray Blakemore be approved, with the following outcomes:
- That Brick Kiln Lane, including 70 Oxford Road, is rezoned to PDP medium density residential.
 - That the ODP Option A is applied to the land to show principal road layout. The final principal road layout could be determined in Rights of Reply.

4.5.4 Recommendations

315. That the following outcome for submissions occurs:
- Kenneth Murray Blakemore [319.1,319.2], Ruth and Bruno Zahner [213.1], Survus Consultants Limited [250.4] is **accepted**
 - FS Ken Blakemore [FS 129] is **accepted**

⁴⁸ Built form standard GRZ-BFS4 sets 8m, or two storey, height limits, except for on large sites above 6000m² where 12m, or three-storey, with at least a 10m setback.

4.5.5 Plan-enabled capacity arising from this recommendation

316. This is an additional 10.3ha of gross area plan-enabled by the rezoning:

- My conservative assessment of the ODP recommendations suggests that no additional land is required for greenspace.
- I note the stormwater management area suggested for 70 Oxford Road as part of the consent application recommendations, however, at the time of writing, a consent has not yet been granted for this site. I have included this stormwater reserve of 400m² in the reserves calculation.
- New developments in the district that require new roads has resulted in roading areas within the developments ranging between 18%-25% of total land for roading⁴⁹. However, as this site can be served by a linear access, I consider that the roading requirements are at the lower end of this scale, at 18%, or 1.8ha.
- Thus the reserve requirements on the north block are about 1.8ha, out of a total area of 10.3 ha, making for 8.46 ha of land I can currently assess for potential plan-enabled capacity following the rezoning recommendation.
- As with other land in the West Rangiora development area, I have assessed a lower bound of 500m² lot sizes based off the general residential lot minimum and an upper bound of 200m² lot sizes as an MDRS scenario.

317. For a broad understanding of plan-enabled capacity based on this rezoning, I have calculated the following:

- A lower bound of 500m² lot sizes, resulting in about 169 additional lots
- An upper bound of 200m² lot sizes, resulting in about 423 additional lots
- An average scenario of 296 additional lots.

4.5.6 Amendments

318. I recommend that the PDP is amended as follows, and as set out in Appendix A:

- That the planning maps are changed to rezone Brick Kiln Lane to PDP medium density residential
- That the existing West Rangiora ODP is amended with the principal roads added only

⁴⁹ As per my section on capacity and uptake

5 North West Rangiora



Figure 18 North West Rangiora (from Proposed Plan).

The rezoning is the LLRZ area immediately to the west of Rangiora.

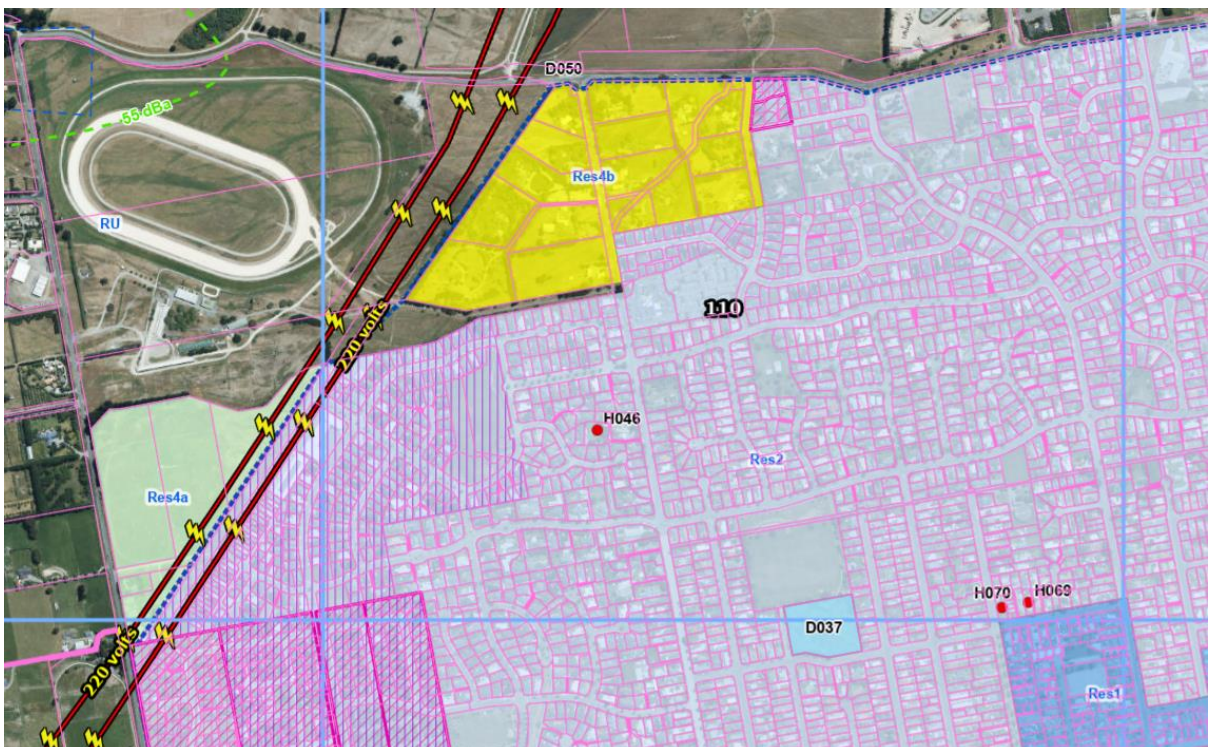


Figure 19 North West Rangiora - Operative District Plan

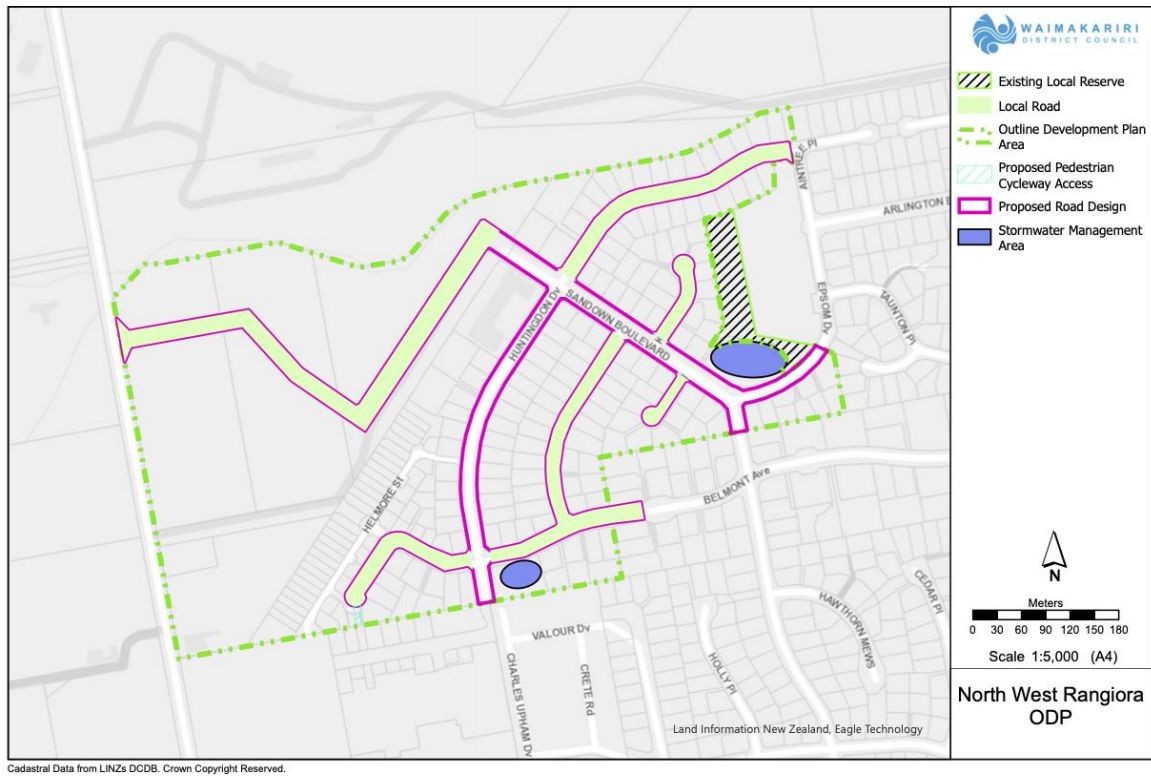


Figure 20 NWR Outline Development Plan (from operative and Proposed Plan)

5.1 North West Rangiora Development Area

5.1.1 Description, and Matters raised by submitters

319. The remainder of the existing North West Rangiora Development area consists of the Arlington and Farmlands Trust developments in the western part, which are now largely complete, and an area of rural residential land (residential 4a) to the west, separated by Transpower’s Islington-Kikiwa A and B 220kV transmission lines. The area west of the transmission lines is proposed as large lot residential in the PDP, as the continuation of the operative residential 4a zone. It is not a future development area in the context of Map A, CRPS, being outside of the projected infrastructure boundary.

320. The area is:

- Currently zoned as residential 4a (rural-residential) in the operative district plan;
- Proposed in the PDP as LLRZ;
- Outside of the projected infrastructure boundary, as set out in Map A of the CRPS.
- Is described as an existing development area in the operative plan and PDP, with proposed rules and other provisions.⁵⁰

⁵⁰ DEV-NWR-APP1

- Contains an ODP in the operative plan and notified PDP⁵¹
321. Doncaster Developments Ltd [290.1] seek to rezone this western rural-residential/large-lot area of 11.6ha at the north east end of Lehmans Road, Rangiora from LLRZ to GRZ. Transpower [FS 92] are neutral on this in a further submission. Doncaster [290.5] oppose the current ODP within the Proposed Plan, seeking changes to reflect their ODP.
322. There is a property at 266 Lehmans Road which is not owned by Doncaster Developments Limited, but which may be in submission scope as Doncaster have sought rezoning of the full LLRZ area.
323. Waka Kotahi [275.83] consider that greenfield development within the Northwest Rangiora Development Area outside of the Projected Infrastructure Boundary is likely to encourage the use of private vehicle use, proposed pedestrian and cycle connections are limited and no public transport. They request to amend the Outline Development Plan to include better cycle and pedestrian connections.
324. The Waimakariri District Council [367.60,367.61] seeks to have more accurate layer name for North West Rangiora Outline Development Plan. They seek to amend 'Proposed Road Design' layer name on North West Rangiora Outline Development Plan (ODP) to 'Proposed Road' on Planning Map, and on map in DEV-NWR-APP1 Northwest Rangiora ODP.

5.1.2 Assessment

Natural hazards, geotechnical

325. Mr Aramowicz's summary advice is:
- *There are no active faults, nor significant risk from liquefaction, nor likely deposits of peat.*
 - *In summary, there are no significant risks from natural hazards that would prevent the proposed land use.*
 - *The site is located in an area where, based on existing nearby land, gravels are expected to be present at shallow depth. Given this, there are no known geotechnical matters that would prevent the proposed land use.*

3 waters

326. Mr Aramowicz's summary advice is:
- *In summary, the Aurecon report [for the submitter] indicates stormwater runoff from the proposed land use can be treated and managed onsite in a way that will avoid adverse effects to surrounding property. Given this, there are no significant issues with stormwater runoff that would prevent the proposed land use.*
 - *There will be capacity within the existing WDC network. Wastewater can discharge to the Arlington network. In summary, there are no wastewater constraints that would prevent the proposed land use.*

⁵¹ <https://waimakariri.isoplan.co.nz/draft/rules/0/297/0/0/0/224>

- WDC's network has allowed for capacity to service this site.
- In summary, there are no water supply constraints that would prevent the proposed land use.

Transport

327. Mr Gregory's summary advice⁵² is:

- Mr Gregory cannot support the development at the current point in time.
- The development of the Northeast arterial would not serve access towards the town, and would not therefore fully mitigate the lack of accessibility stated above. The cycle way identified in the Waimakariri walking and cycling plan (following the alignment of the Northeast arterial) has not been identified.
- If the proposal were approved, I would recommend access management, to avoid direct access to Lehmans Road and the northwest arterial. I would also recommend more provision for access, including development of active travel networks.

Greenspace

328. Mr Read makes the following comments:

- In isolation, this submission proposal does not trigger a requirement for any additional neighbourhood park green space if rezoned General Residential. The site's transmission line margin is also not required for Council community green space. This has already been provided for within the existing Council-owned transmission corridor land immediately to the south-east. Being adjacent to the 'future road', this land will ultimately form part of a strategic community recreation linkage reserve (walkway-cycleway) running between Lehmans Road and West Belt.

Urban design

329. Mr Jolly made the initial comment expressing the concern that people may not wish to recreate under the transmission lines, and the need for a more central park

Cultural

330. No specific cultural advice was requested in the context of this rezoning request, as I considered it to be small, and does not immediately intersect or involve freshwater. It is also not within or near a SASM. The same cultural advice, considerations and processes as for other rezoning requests would apply at the time of seeking subdivision consent.

Heritage

331. There are no listed heritage items or trees in the area.

From the applicant

332. The submitter has supplied the following expert evidence:

<u>Person/Organisation</u>	<u>Evidence type</u>
Mr Ray Edwards	Transport

⁵² Paras 167-175, Mr Mark Gregory expert transport engineering evidence

Mr Tim Heath	Economics
Mr Giles Learman	Contaminated Land
Mr Regan Smith	Infrastructure
Mr Vikramjit Singh	Urban Design
Ms Patricia Harte	Planning

Discussion

333. The area is known as the North West Rangiora development area, with the primary developer being Doncaster Developments Ltd. Ms Harte, for Doncaster, considers that an upzoning of the area from rural-residential/large-lot to medium density residential will create 110 allotments⁵³.
334. I note differences in density amongst their experts. Development would have to achieve 15 households per ha unless constraints are identified, otherwise 12 households per ha, in order to achieve the required yields of SUB-S3.
335. I consider that this area is something of a zoning anomaly in the context of the district, as despite it being accessible to the rest of Rangiora, the regional planning framework has not enabled it to be fully upzoned, because it is not a greenfield priority area or future development area, and outside of the projected infrastructure boundary as defined in Map A. It is already a residential 4a zone in the operative district plan, and proposed to continue as a large lot residential zone. However, I note that under the CRPS, and National Planning Standards rural residential zones are not urban zones, and as such, this area would require rezoning.
336. It may have been that the 220kV transmission lines at the time formed a logical boundary on the urban limits of Rangiora, however, the town, and the requirement for additional capacity, has changed since then. Since the formulation of Map A and Chapter 6, there has been no available pathway under the CRPS for upzoning it, except in the context of a CRPS review under policy 6.3.11.
337. However, the proposal can be considered under the NPSUD, particularly Policy 8, if it provides significant development capacity and contributes to well-functioning urban environments. As I have outlined above, I consider that all NPSUD assessment pathways ultimately result in a reconsideration of the CRPS provisions in the context of defining aspects of a well-functioning urban environment, albeit, without the binding spatial constraints of Map A.
338. I understand that the relevant setbacks, buffers, and protections for the 220kV transmission lines have been agreed between the Council, developer, and Transpower, as part of earlier development proposals in the area.
339. Apart from transport, which I discuss below I note that there are no technical constraints to development on the site.

Transport issues

⁵³ Para 31, Ms Patricia Harte expert planning evidence

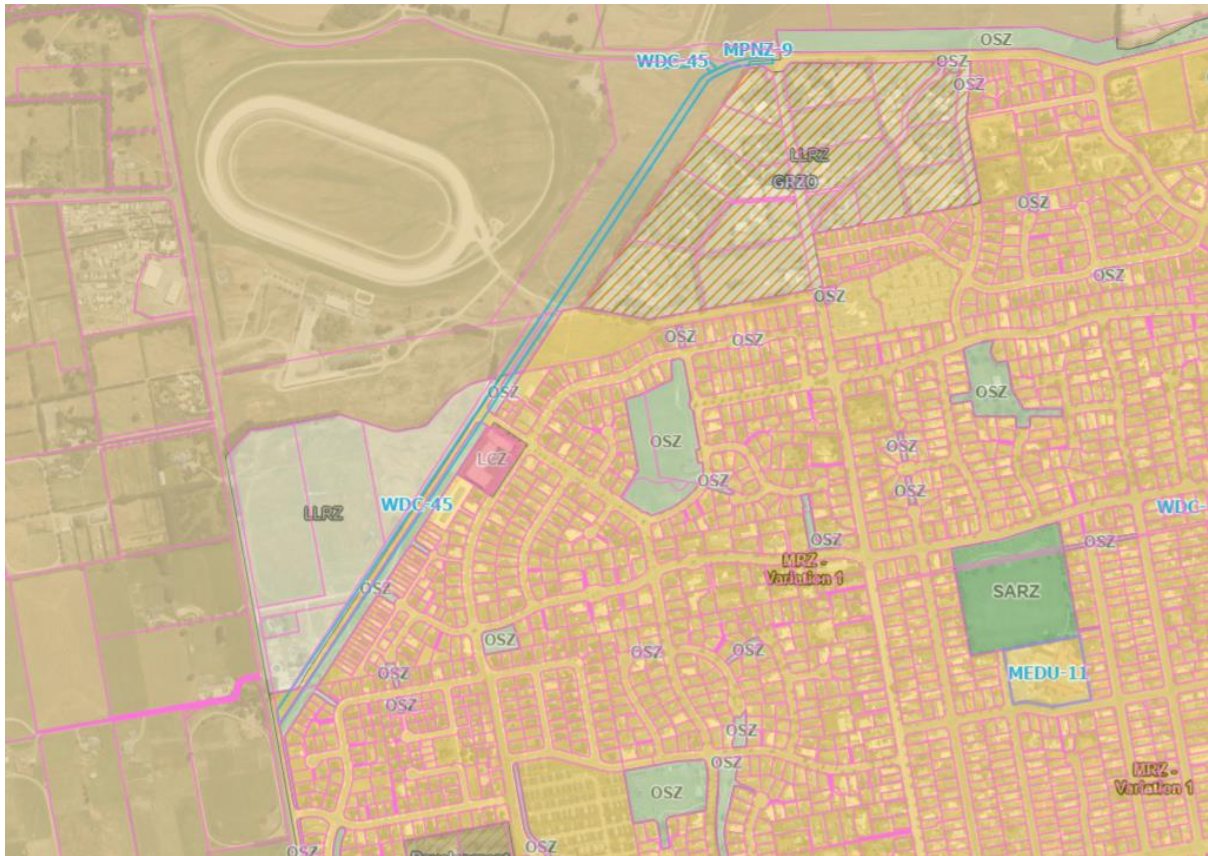


Figure 21 NWR transport (designation for proposed Parrott Road in blue)

340. Mr Edwards states that the 110 allotments are based on general residential density⁵⁴, and the traffic generated from them is assessed accordingly. However, there is a slight difference between general residential, which has traditionally assumed one two storey dwelling per allotment, and PDP medium-density residential, which provides for a single dwelling of three stories. There are consenting pathways for greater density. Thus I consider that 110 lots modelled for transport purposes is likely on the low side..
341. Council has a long-standing proposal to construct and form Parrott Road, which runs parallel to the transmission lines. The designation sits over land parcels owned by WDC and a parcel of reserve vested in the Canterbury Regional Council⁵⁵. This road is set out as a project in the WDC LTP.
342. Council’s transport expert for this site, Mr Gregory, has raised concerns about the connectivity of the site to the rest of Rangiora from a transport perspective, and the potential to overload Belmont Avenue (a local road), which is the most direct route from the development to the Rangiora town centre⁵⁶. Whilst he notes the proposed arterial route – Parrott Road - along the transmission line corridor, he still has concerns about connectivity, as Parrott Road exits onto roads that are still well removed from direct routes to the Rangiora town centre.
343. Mr Edwards, transport expert for the applicant, considers that the site is well-connected, considering a southern connection of Parrott Road but no northern connection.

⁵⁴ Para 13, Mr Ray Edwards expert transport engineering evidence

⁵⁵ I think under the Soil Conservation and Rivers Control Act 1941

344. In considering Mr Gregory's concerns, I note that if Parrott Road is constructed in full, I consider the proposed development will have the following connections:
- West to Lehmans Road (an arterial road).
 - The southern end of Parrott Road onto Lehmans Road.
 - East to Belmont Avenue (a local road).
 - East to Sanddown Boulevard (a local road).
 - The northern end of Parrott Road onto River Road (an arterial road).
 - The possibility exists of an addition sixth connection between Parrott Road and West Belt direct, along the existing back access to the Rangiora Racecourse.
 - Some of these will be suitable for cycling and/or have constructed cycle paths on them.
345. I note that in the context of other developments in the district, this is a relatively high number of connections for a relatively small number of lots.
346. I also note that trip destinations will be different, as those heading to and from Christchurch (or otherwise away from Rangiora) will take the arterial routes avoiding Rangiora (Lehmans Road, also potentially River Road), whilst trips into Rangiora are more likely to take a more direct route, either through the streets of Arlington (Sanddown Boulevard and Belmont Avenue), or on the Parrott Road to West Belt connection if it is constructed.
347. Mr Gregory has recommended access management to avoid direct connections onto the arterials, as well as to avoid overloading the Arlington streets. I agree with the need for this access management, and consider that an additional access direct between Parrott Road and West Belt would assist. This may also assist with other developments in the area, for instance, North Rangiora. A direct route off Parrott Road onto West Belt via the Rangiora racecourse back entrance and thus into Rangiora would assist with the direct connections. This route is currently privately owned by the racecourse.
348. Provided the proposed roads also contains space for a shared cycle and walking path, may address Waka Kotahi's concerns about the development being too reliant on private motor vehicles.
349. I have asked Mr Jolly to address these features in his ODP changes, in Figure 22 below.
350. I also recommend that the need for access management will be required during consenting, which will require an area specific rule and/or a matter of discretion. Such a provision should be provided by the submitter
351. If rezoning were to occur Mr Jolly has suggested changes to the DEV-NWR ODP as follows:

Outline Development Plan

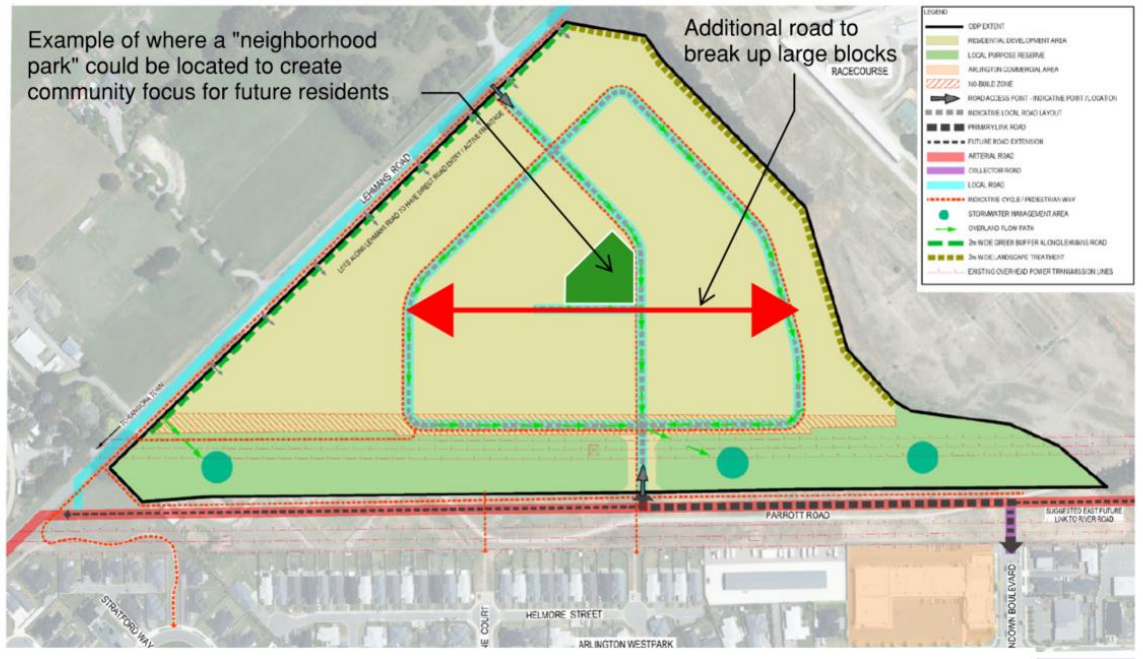


Figure 22 Central park within the rezoning area (avoiding the transmission lines)

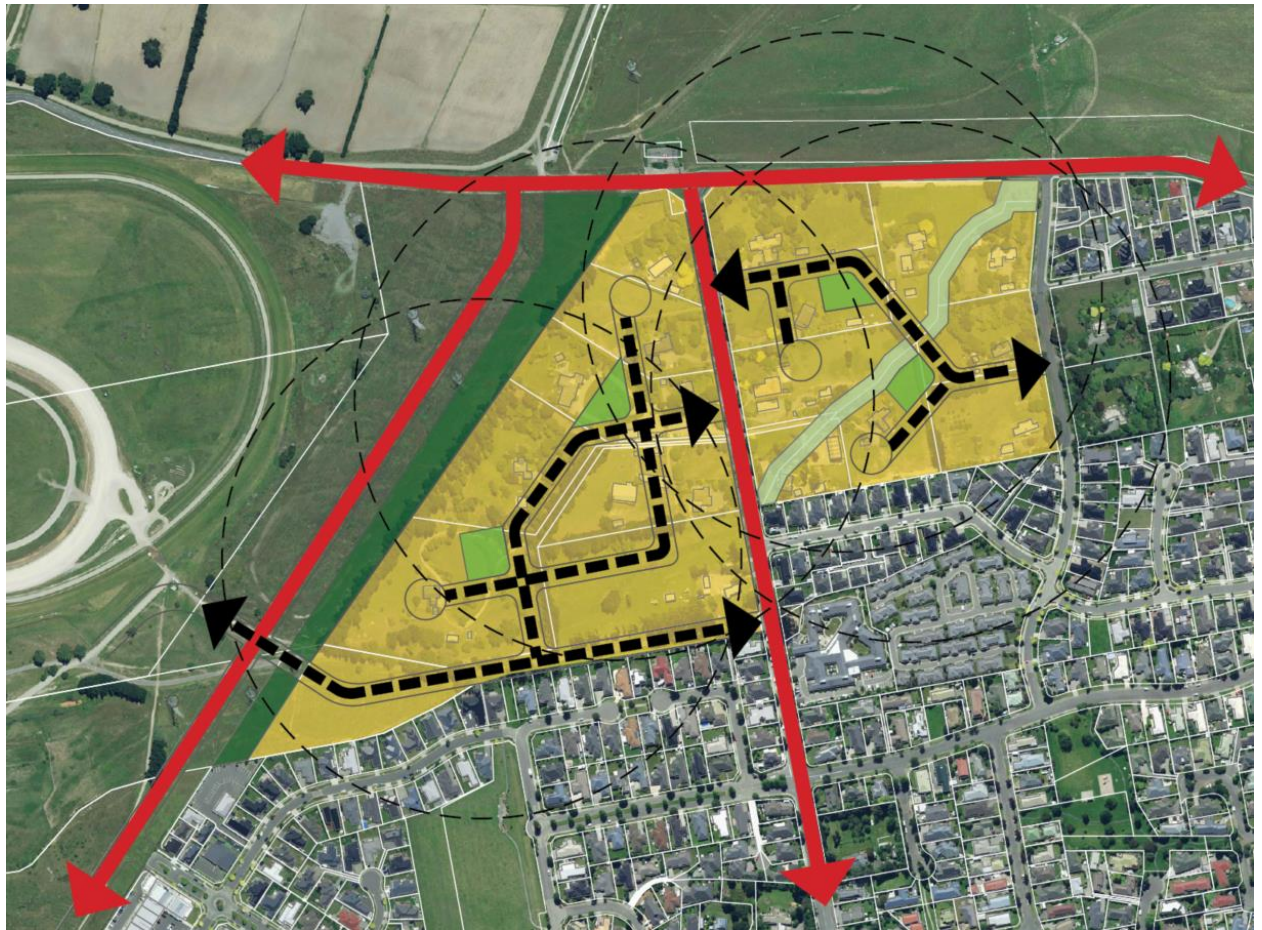


Figure 23 Changes to NWR ODP (2) showing movement network

Overall recommendations

352. I assess the scope for rezoning from the submissions below:

Submitter	Number	Land Included in submission	Zoning sought
Doncaster Developments Ltd	290.1	Rezone this western rural-residential/large-lot area of 11.6ha at the north east end of Lehmans Road, Rangiora from LLRZ to GRZ	General residential and medium density residential zone

353. I consider that there is scope to recommend upzoning of the residential 4A/LLRZ zone to either general resident or medium density residential, as all land within it is captured by a specific or general submission. Doncaster Development Ltd own the bulk of the site, with some remaining parcels owned or vested in Council.

354. The primary difference between general residential and PDP medium density residential is height⁵⁷ and allotment size. General residential is 8m, or two storeys, and PDP medium density residential is three storeys. Whilst this area is not surrounded by existing residential areas, except on the eastern boundary, I am conscious of the height difference permitted by the zones, and particularly in the context of the built form to the east which permits up to two-storeys, I recommend this integration matter to be considered in hearing stream 7.
355. For me, the more substantive matter is the allotment size, with the PDP medium density zone permitting 200m² allotments, versus 500m² for general residential. Noting the requirements in SUB-S3 to achieve a minimum density of 15 households per ha, except where demonstrated constraints occur, in which case, no less than 12 households per ha. I consider that the 500m² allotment limitation for the general residential zone would not enable this SUB-S3 requirement to be met, as a permitted activity.
356. In considering the submission to upzone to PDP medium density residential, I note the following:
- There is no pathway to consider the submission under the CRPS, other than to recommend rejecting it as it is outside the shaded areas in Map A and projected infrastructure boundary. Objective 6.2.1 requires new development in these areas to be avoided.
 - My recommended interpretation pathway 2 considers that Policy 8 NPSUD provides a pathway for considering the submission, with the dual tests of significant development capacity and contributing to well-functioning urban environments.
 - In considering whether the proposal provides significant development capacity, I note that the developer has calculated this as 110 lots, but I note the potential for multiple dwellings on those lots and/or smaller lot sizes. In the context of north-west Rangiora, I consider that this is significant, especially as this is the only quadrant of Rangiora to not have a new development area.
 - I also consider it contributes to a well-functioning urban environment by creating a natural western boundary for Rangiora at Lehmans Road. This is consistent with Lehmans Road forming the western boundary of the town on the developments further south in the West Rangiora development area. This well-functioning requirement is only met however with the recommendations on roading that I have made above.
 - CRPS 6.3.11(5) sets out a useful summary of the CRPS requirements for amendments to the location of land for development. These are:
 - Infrastructure is either in place or able to be economically and efficiently provided to support the urban activity
 - Provision is in place or can be made for safe, convenient, and sustainable access to community, social, and commercial facilities.
 - The objective of urban consolidation continues to be achieved

⁵⁷ Built form standard GRZ-BFS4 sets 8m, or two storey, height limits, except for on large sites above 6000m² where 12m, or three-storey, with at least a 10m setback.

- Urban land use, including industrial and commercial activities, does not increase the risk of contamination of drinking water sources, including the groundwater recharge zone for Christchurch’s drinking water
- Urban development does not lie between the primary and secondary stop banks south of the Waimakariri River which are designed to retain floodwaters in the event of flood breakout
- The landscape character of the Port Hills is protected
- Sufficient rural land is retained to maintain the open space landscape character either between or surrounding the areas of urban activity within Greater Christchurch
- The operational capacity of strategic infrastructure is not compromised.

357. I consider that the land is:

- immediately adjacent to an urban area identified in Map A,
- already provided for within the operative and Proposed Plans as an existing development area with its own rule framework and development area,
- infrastructure is either in place or available to be provided to it,
- It is a consolidation of urban form, immediately adjacent to an existing urban area, and retains sufficient land to maintain the open space landscape character either between or surrounding the areas of urban activity within Greater Christchurch,
- It is not within a drinking water groundwater recharge zone; and,
- It can be developed in a way that does not compromise strategic roads.

358. I also note CRPS Policy 6.3.4 that requires the protection of strategic freight routes, and providing patterns of development that optimise the use of existing network capacity, and requiring travel demand management.

266 Lehmans Road

359. I noted above the property at 266 Lehmans Road, owned by Robyn Fantham (of 0.25 ha), which I consider may be within scope of the Doncaster submission to rezone all of the area. Ms Fantham is not a submitter on the PDP. However, when adding up the areas sought, the Doncaster submission area only includes the Doncaster owned properties. However, given the differences in how areas can be measured, I do not think this is grounds to consider that the Doncaster submission does not include all of the LLRZ land.

360. If 266 Lehmans Road was not upzoned along with the rest of the area, I do consider the reverse sensitivity effect, as well as the anomaly of retaining a small, isolated parcel of LLRZ. I do not consider this would be consistent with the objective direction for the LLRZ zone to maintain a character distinct to other residential zones, as follows:

LLRZ – O1 Purpose, character and amenity values of Large Lot Residential Zone⁵⁸

⁵⁸ <https://waimakariri.isoplan.co.nz/draft/rules/0/258/0/0/0/224>

A high quality, low density residential zone with a character distinct to other Residential Zones such that the predominant character:

- 1. is of low density detached residential units set on generous sites;*
- 2. has a predominance of open space over built form;*
- 3. is an environment with generally low levels of noise, traffic, outdoor lighting, odour and dust; and*
- 4. provides opportunities for agriculture activities where these do not detract from maintaining a quality residential environment, but provides limited opportunities for other activities.*

361. The character of the area as LLRZ changes if the wider upzoning occurs, and as such, I would recommend that the upzoning applies to 266 Lehmans Road as well

362. I am minded to recommend rezoning the area to PDP medium density residential, provided the following actions occur:

- An additional central park is created
- Parrott Road is to be formed
- An additional Parrott Road to West Belt connection via the Rangiora racecourse back entrance
- These roads should include cycleways where possible
- Access management methods should ensure that strategic road use is discouraged in favour of the Parrott Road to West Belt connection.

363. I note the specific requirements from Council experts for Parrott Road and the additional access between Parrott Road and West Belt to be formed prior to development occurring, but I note that no evidence has been provided from the submitters, to ensure that this will occur. There are frameworks within the PDP for recommending area specific rules, development contributions, and/or financial contributions that such a condition could fit under, but I note that it does need to be provided by the submitters.

364. I consider that the other recommendations above can occur via changes to the ODP.

5.1.3 Recommendations

365. If provisions in the PDP requiring:

- the creation of Parrott Road and the additional Parrott Road to West Belt connection; and
- a rule or provision outlining the access management methods to protect strategic roads; *are not provided,*

I recommend the following outcome for submissions:

- Waka Kotahi [275.83], Doncaster Developments Ltd [290.1, 290.5] are **rejected**
- Further submission Transpower [FS 92] is **rejected**
- Waimakariri District Council [367.60, 367.61] is **accepted**

366. If provisions in the PDP requiring:

- the creation of Parrott Road and the additional Parrott Road to West Belt connection; and
- a rule or provision outlining the access management methods to protect strategic roads; *are provided*

I recommend the following outcome for submissions:

- Waka Kotahi [275.83], Waimakariri District Council [367.60, 367.61] are **accepted**
- Further submission Transpower [FS 92] is **accepted**
- Doncaster Developments Ltd [290.1, 290.5] are **accepted in part**

5.1.4 Plan-enabled capacity arising from this recommendation

367. This is an additional 11.85 ha of gross area available if the rezoning recommendation is accepted. This includes the Doncaster 11.6ha and 266 Lehmans Road of 0.25ha:

- Mr Jolly's recommendations suggest the need for an additional central park within the development, of about 700m².
- New developments in the district that require new roads has resulted in roading areas within the developments ranging between 18%-25% of total land for roading⁵⁹. I consider that the roading requirements are at the middle end of this scale, at 21%, or 2.37ha, noting that the land for Parrott Road is already vested in Council or as river reserve.
- The operative ODP for the area⁶⁰ and urban design evidence presented do not suggest any additional reserves, however, if they are required or being planned, this can be recalculated in any Right of Reply.
- Thus the reserve requirements are about 3ha, out of a total area of 11.85 ha, making for 8.46 ha of land I can currently assess for potential plan-enabled capacity following the rezoning recommendations.
- I have assessed a lower bound of 700m² lot sizes and an upper bound of 350m² lot sizes.

368. For a broad understanding of plan-enabled capacity based on this rezoning, I have calculated the following:

- A lower bound of 700m² lot sizes, resulting in about 135 additional lots
- An upper bound of 200m² lot sizes, resulting in about 474 additional lots. This represents an MDRS scenario.
- An average scenario of 305 additional lots.
- I noted above that I considered that the submitters' statement of 110 additional lots based on general residential density is likely on the low side, as the general residential site density of 500m² would still achieve 190 additional lots, and a more generous lot size of 700m² would still achieve 135 lots on this site.

⁵⁹ As per my section on capacity and uptake

⁶⁰ https://www.waimakariri.govt.nz/__data/assets/pdf_file/0012/141420/sht155-dp2005.pdf

- I would like to understand the discrepancy between my calculations and the submitters, but I do not think it is material or determinative in respect of this rezoning recommendation.

5.1.5 Amendments

369. If provisions in the PDP requiring the creation of Parrott Road, the additional Parrott Road to West Belt connection, and access management measures to protect the strategic roads *are not* provided, I recommend no changes to the PDP arising from recommendations in this section.
370. If provisions in the PDP requiring the creation of Parrott Road, the additional Parrott Road to West Belt connection, and access management measures to protect the strategic roads *are* provided,, I recommend the following changes to the PDP arising from recommendations in this section.
371. I recommend no amendments at this time.

5.2 Rangiora Racecourse Rezoning (Mr Phillip Davidson)

5.2.1 *Matters raised by submitters*

372. Phillip Davidson [364.2] seeks to rezone the Rangiora Racecourse as a recreational area to preserve it from the potential for exploitation.

5.2.2 *Assessment*

373. I understand that Mr Davidson's submission is in the context of a consent application for proposed quarry that was intended for the racecourse site. As I understand it, this proposal was declined. I also note my recommendations in hearing 5 on earthworks to place restrictions on quarrying activities within a certain distance of urban zones, which would protect this site from quarrying.

374. Mr Davidson is also not the landowner of the racecourse, or as I understand it, associated with the organisation that operates the racecourse.

375. I do not consider that the racecourse needs to be rezoned as a recreational area.

5.2.3 *Recommendations*

376. That the following outcome for submissions occurs

- Phillip Davidson [364.2] is **rejected**

5.2.4 *Amendments*

377. I recommend no amendments to the PDP arising from this section

5.3 Extension to North Rangiora Development Area

5.3.1 Description and Matters raised by submitters



Figure 24 North Rangiora Development Area

This is the area in hatching in the centre of the map, entitled LLRZ and GRZO (General Residential Overlay)

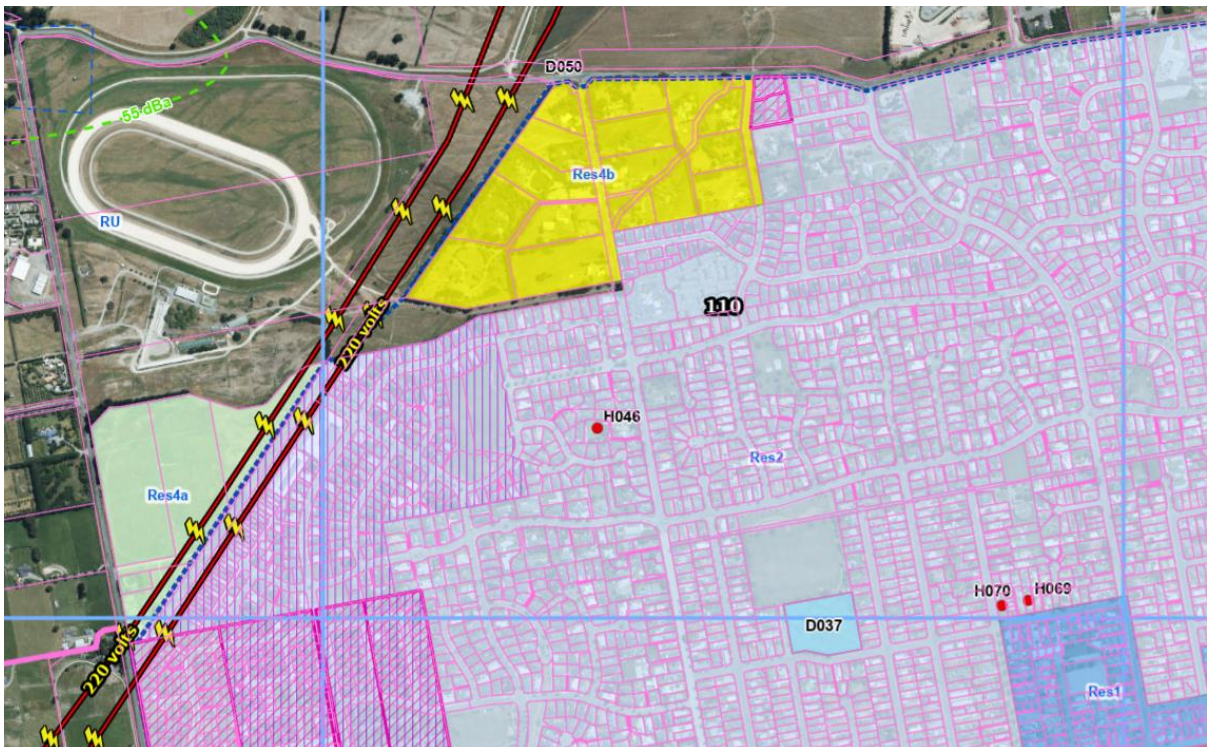


Figure 25 North Rangiora Development Area (yellow) from Operative District Plan



Figure 26 Existing North Rangiora Development Area, rezoning proposal is to the west of this

378. This area is:

- Currently zoned as residential 4b (rural-residential) in the operative district plan,
- Proposed in the PDP as LLRZ, with a general residential overlay,
- Within the projected infrastructure boundary, as set out in Map A of the CRPS,
- Outside of any existing development area in the operative plan and PDP, and;
- Adjacent to an existing development area with an existing ODP in the operative plan and notified PDP⁶¹

379. It consists of one 10ha western block and a 8.5 ha eastern block, bisected by a drainage reserve, of about 0.5 ha, making for 19 ha. The land consists of about 17 privately owned parcels of approximately 1-2ha in size. It has road access by way of West Belt, a collector road, and Ballarat Road, a local road.

380. North Rangiora Owners Group [181.1] seeks to rezone 300, 302, 310, 311, 312, 315, 319, 321, 324, 327, 331, 335, and 336 West Belt 105 and 109 River Road and 1, 3 and 5 Ballarat Road, Rangiora from Large Lot Residential Zone to General Residential Zone (GRZ), within the northern part of Rangiora, currently referred to as the existing North Rangiora Development Area.

⁶¹ <https://waimakariri.isoplan.co.nz/draft/rules/0/275/0/0/0/224>

381. Chaoting Ni and Luyan Qian [59.1] request to rezone their property from rural residential 4B to residential 2 and will participate in, and contribute to plans for rezoning the area. Whilst not stated in their submission, their property is 310 West Belt Rangiora.

5.3.2 Assessment

382. The area is adjacent to an existing development area, in the context of the operative district plan and Proposed Plan, as shown in Figure 27 above, which is proposed for general residential under the PDP, and medium density residential under Variation 1.

383. There is a private accessway⁶² in the south leading to the Rangiora Racecourse from West Belt, which contains no residential dwellings, currently zoned as rural under the operative plan, proposed to be rezoned as general residential (with no overlay), and medium density residential under Variation 1.

Natural hazards, geotechnical

384. Mr Aramowicz's summary advice is:

- *Current flood hazard mapping on WDC's GIS for a 0.5% AEP event (i.e. 200 yr ARI) and for the Ashley River breakout scenario indicates the site is almost entirely within a zone of very low flood hazard, except for a narrow area of medium flood hazard along the alluvial channel. The site is not located in a high flood hazard area.*
- *There are no active faults, nor significant risk from liquefaction, nor likely deposits of peat.*
- *In summary, there are no significant risks from natural hazards that would prevent the proposed land use.*
- *The site is in an area where, based on existing nearby land, gravels are expected to be present at shallow depth. Given this subsidence and liquefaction are not likely hazards. In summary, there are no known significant natural hazard or geotechnical matters that would prevent the proposed land use.*

3 waters

385. Mr Aramowicz's summary advice is:

- *In summary, there are no known significant stormwater constraints that would prevent the proposed land use.*
- *Whilst there may be some minor constraints, there will be engineering solutions that will allow this area to be serviced, most likely by discharging into the existing Arlington wastewater network. In summary, there are no known significant wastewater constraints that would prevent the proposed land use.*
- *There is piped reticulated water supply nearby, and a water main crosses the site. This will most likely need to be relocated as part of development.*
- *In summary, there are no known significant water supply constraints that would prevent the proposed land use.*

⁶² 309 Lehmans Road (although the parcel is accessed from West Belt)

Transport

386. Mr Binder's advice is:

- *This site is located adjacent to existing bus service on River Road/West Belt so is thus well served by PT. I do note it is some distance (3.0km) to the town centre, but is still generally considered to be appropriate for non-car travel. I also consider that West Belt, River Road, and downstream links have sufficient existing capacity to accommodate new private vehicle traffic generated by development under this submission*
- *River Road and West Belt are intended to have higher-quality cycling facilities as part of the Walking & Cycling Network Plan, but as yet, this area is not well served by appropriate cycling facilities.*
- *I would strongly urge an ODP be developed for this area, with several key elements considered:*
 - *Broader network connectivity, including to the new North-west Collector Road*
 - *Local road connections (given the existing block sizes are inappropriately large)*
 - *Pedestrian connectivity independent of vehicle links (e.g., through the top of any no-exit roads, along drains and other street-to-street connections)*

Greenspace

387. Advice from Mr Read was not sought on this application

Cultural

388. No specific cultural advice was requested in the context of this rezoning request, as I considered it to be small, with existing low density urban form, and does not immediately intersect or involve freshwater. It is also not within or near a SASM. The same cultural advice, considerations and processes as for other rezoning requests would apply at the time of seeking subdivision consent.

Heritage

389. There are no listed heritage items or trees in the area.

Urban design

390. Mr Jolly makes the following comments, some of which are also relevant for the North Rangiora development area which I will consider in the next section:

- Extend Parrott Road northward to meet up with River Road which runs the length of the northern boundary of Rangiora.
- Formalise the vehicle access route to the Rangiora Racecourse between West Belt Road and the extended Parrott Road to provide additional access for future residential development within the ODP from the south, maintain access to the racecourse and to provide additional east-west movement opportunities for the wider area.
- Retain and enhance existing shelter and provide an additional green buffer strip between future residential development and the pylons along the alignment of Parrott Road.

- Provide secondary movement structure within the two areas, streets that will provide access to new development while maintaining access to existing and providing east-west connections to West Belt Road and Ballarat Road.
- Off-set connections onto West Belt Road to minimise rat-running through the residential streets.
- Locations for open spaces, to provide amenities such as play, parks, social gathering spaces and informal recreation spaces for future residents. Two 'pocket park' sized green spaces (approx 0.2ha) have been proposed in each area separated to provide walkable access to at least one open space for all future residents (within 250m or a 2-3min walk).
- Maintain the stormwater management corridor within the eastern area.

Discussion

391. The North Rangiora Owners Group represents landowners in the area who wish to be upzoned.

392. Experts have not identified technical constraints to rezoning this land.

393. However, I consider that despite the landowners not seeking rezoning, the PDP has proposed a general residential overlay on this land, indicating that it is intended to become general residential, with the limiting factor being the lack of an ODP. As with development area overlays, I consider that there is scope to consider that this land is anticipated to be upzoned. It also requires myself, on behalf of Council to consider the appropriateness of the overlay.

394. Given the larger size of the blocks, and the relatively good access to all of them (apart from the southern blocks, which I discuss below), I consider there is a risk of ad-hoc and unstaged developments, potentially resulting in a proliferation of access points onto West Belt in particular. For this reason, the proposed ODP aims to provide local road access to all properties, rather than to rely on a multitude of potential accessways onto West Belt.

395. This in turn requires additional access to the south, along the racecourse back entrance. I note that a formed road in this location may also be beneficial for the Doncaster development in reducing travel time to the centre of Rangiora, whilst still providing access to River Road (along the proposed transmission line corridor road) for journeys that do not need to go to the centre of Rangiora.

396. I asked Mr Jolly to incorporate this into an extension of the North Rangiora ODP, as represented below:

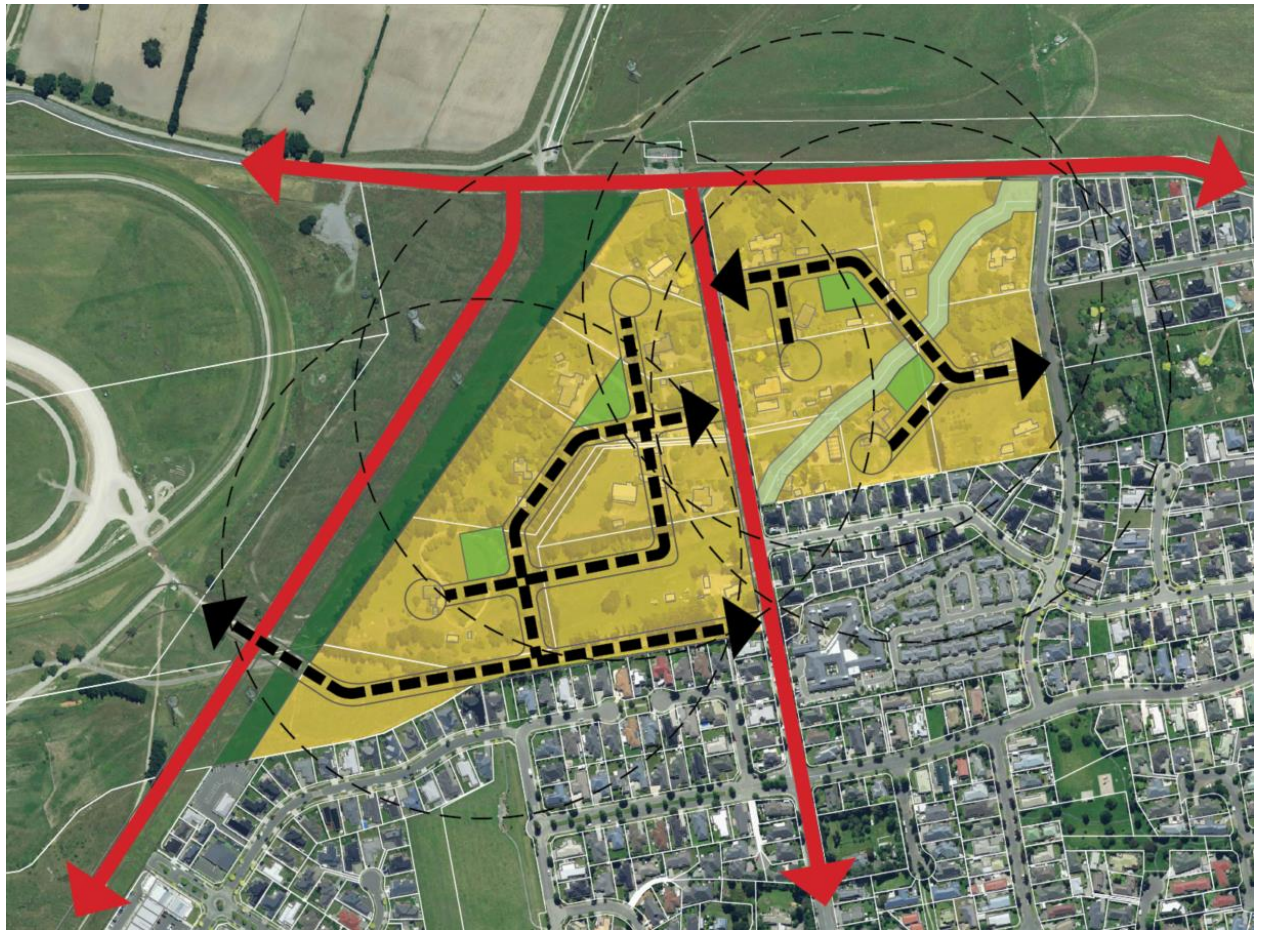


Figure 27 Updates to North and North West Rangiora ODPS

What can it be rezoned as?

397. The area is within the shaded area of Map A, within the projected infrastructure boundary, and proposed to be large lot residential with a general residential overlay. It is immediately adjacent to an existing residential zone. Thus I consider it to be part of the anticipated urban environment, under both the NPSUD and CRPS.
398. The PDP proposes it to be rezoned as Large Lot Residential, with a general residential overlay, signalling general residential as the anticipated potential future land use. Submitters have sought it to be rezoned as general residential.
399. I consider it provides significant development capacity in the context of NW Rangiora, which does not have an FDA, unlike the other three quadrants of the town. I note that as it was intended to become GRZ at some future point, by way of the overlay, it can already be considered to be part of the well-functioning urban environment. The primary issue preventing development to date appears to be the lack of an ODP, which CRPS 6.3.3 requires. If such an ODP is provided, I consider that the policy requirements of the CRPS in respect of this land would be met.
400. I do not consider there is scope from submissions, or the PDP, for PDP medium density zoning to be available as the scope of the submitters' requests for rezoning are limited to general residential. There is no opposition to these rezoning requests.

401. General residential is consistent with the built form of the surrounding zones, and also consistent with the dwellings on the current larger parcels.
402. I thus recommend that the area is upzoned to general residential.

5.3.3 Recommendations

403. I recommend the following outcome for submissions:

- North Rangiora Owners Group [181.1], Chaoting Ni and Luyan Qian [59.1] are **accepted**

5.3.4 Plan-enabled capacity arising from this recommendation

404. This is an additional 19 ha of gross area available if the rezoning recommendation is accepted.
- Mr Jolly's recommendations suggest the need for 4 additional parks, of about 0.3 ha overall.
 - Mr Jolly also suggests widening the drainage reserve to form a blue-green linkage, which would likely double the size of this area to 1ha.
 - New developments in the district that require new roads has resulted in roading areas within the developments ranging between 18%-25% of total land for roading⁶³. I consider that the roading requirements are at the lower end of this scale, at 18%, or 3.42 ha, noting that it already contains two primary roads.
 - Thus the reserve requirements are about 4.72 ha, out of a total area of 11.85 ha, making for 7.1 ha of land I can currently assess for potential plan-enabled capacity following the rezoning recommendations.
 - As it is currently a rural-residential zone, proposed for a general residential zone (with a minimum lot size of 500m²), with existing larger house sizes and gardens have assessed a lower bound of 800m² lot sizes and an upper bound of 500m² lot sizes.
405. For a broad understanding of plan-enabled capacity based on this rezoning, I have calculated the following:
- A lower bound of 800m² lot sizes, resulting in about 148 additional lots
 - An upper bound of 500m² lot sizes, resulting in about 237 additional lots
 - An average scenario resulting in 296 additional lots.
 - Higher densities are unable to be achieved here at this point in time, as the area would require further upzoning through a plan change.

5.3.5 Amendments

406. I recommend that the PDP is amended as follows, and as set out in Appendix A:
- That the planning maps for the area are changed to rezone it as general residential
 - That the existing North Rangiora ODP is amended as per Mr Jolly's recommendations

⁶³ As set out in my capacity and uptake section

6 North East Rangiora

6.1.1 Description and Matters raised by submitters (overall)

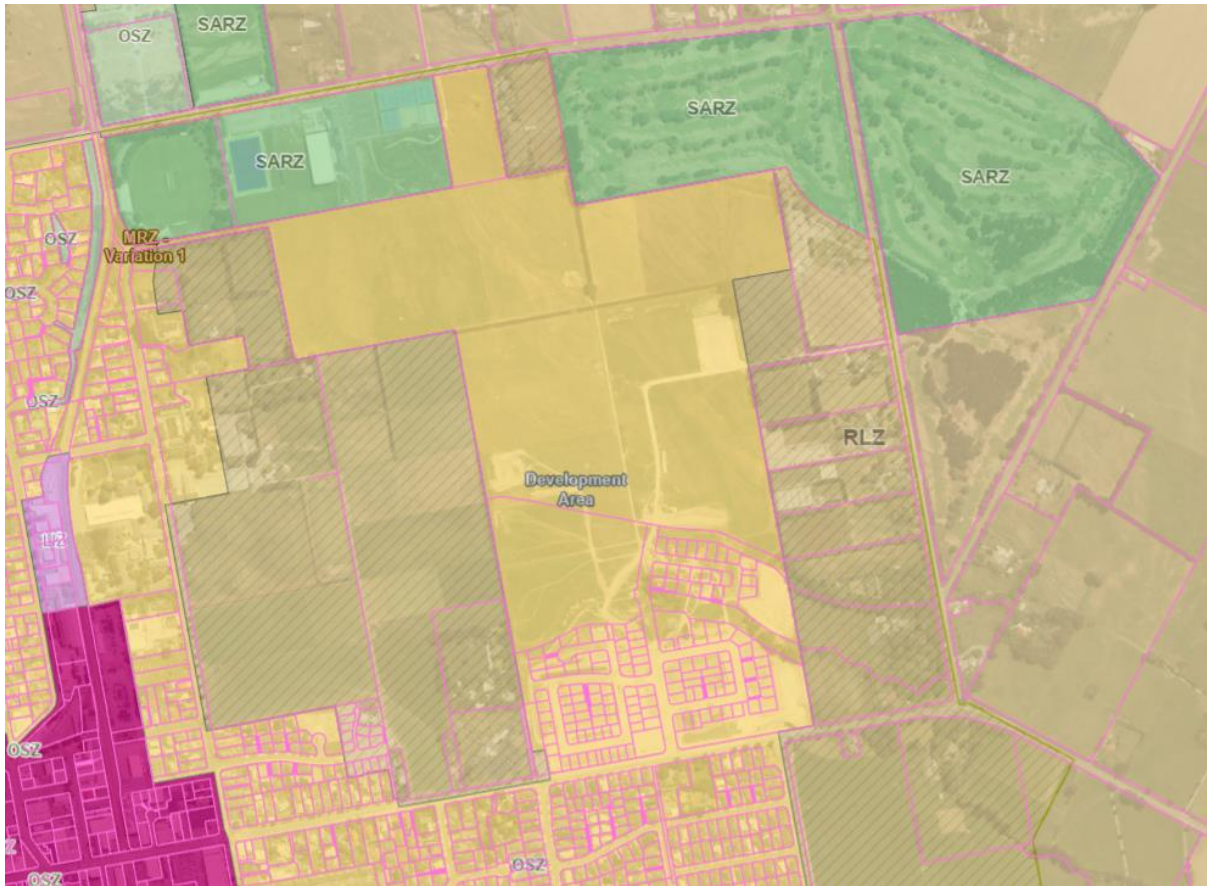


Figure 28 North East Rangiora Development Area

407. The North East of Rangiora is shown on the map above. It is primarily made up of the North East Rangiora development area, but there are other submissions seeking rezoning outside of this development area.
408. The North East Rangiora Development Area is 128 hectares of land in the north eastern part of Rangiora. It is currently zoned as rural, and proposed to be rezoned as rural lifestyle under the PDP. Part of the development area, corresponding mostly to the Bellgrove North development, is proposed to be rezoned as medium density residential under Variation 1, which can be seen on Figures 27 and 28 below.
409. The primary area, coloured yellow above, is the Bellgrove North development.
410. This area is:
- Currently zoned as rural in the operative district plan;
 - Proposed in the PDP as RLZ;
 - Bellgrove North is proposed in Variation 1 as V1 medium density residential. The other areas are not included within the proposed rezoning in the Variation;
 - Within the projected infrastructure boundary, as set out in Map A of the CRPS;

- Within the North East Rangiora new development area in the PDP, and the North East Rangiora FDA as set out in Map A, CRPS; and,
- Stage 1 of the Bellgrove North development received Covid-19 fast track consent. Stages 2-6 are in pre-application discussions with Council at present.

411. The cultural advice is as set out above, requiring the achievement of the following in respect of this block (area 2 in the MKT report):

- *Waterways should be protected and enhanced with suitable setbacks and riparian buffers planted with indigenous species (see policy WM12.5).*
- *There should be a survey undertaken to identify springs and/or wetlands on the site. This should be undertaken by a suitably qualified expert. Springs and wetlands should be protected and enhanced with suitable setbacks and indigenous riparian planting.*
- *Areas identified as culturally sensitive should be protected and enhanced. Consultation with the Papatipu Rūnanga may be required to determine culturally appropriate methods of enhancement.*
- *Low impact design methods, such as, the use of rain and greywater collection and re-use systems, and minimising impervious surface area is encouraged. Refer to Ngāi Tahu Subdivision and Development Guidelines (Appendix 1) for low impact design methods endorsed by mana whenua.*
- *Contaminated sites should be remediated. All contaminated material should be removed from the site and disposed of at a licensed facility.*
- *Measures to minimise earthworks should be considered at the design phase of development.*
- *Earthworks in areas with shallow depth to groundwater and/or over an aquifer can have significant cultural impacts and are of concern.*
- *The site should be surveyed by a suitably qualified person(s) to determine whether there are taonga species within the site that need to be protected.*
- *Refer to Ngāi Tahu Subdivision and Development Guidelines (Appendix 1) for guidance on stormwater, water supply and wastewater servicing.*
- *Note: The list of recommendations is preliminary, general/non-specific and non-exhaustive and is provided as preliminary guidance only.*

412. I note the following sites of significance to Māori (SASM) and other heritage listed items in the area:

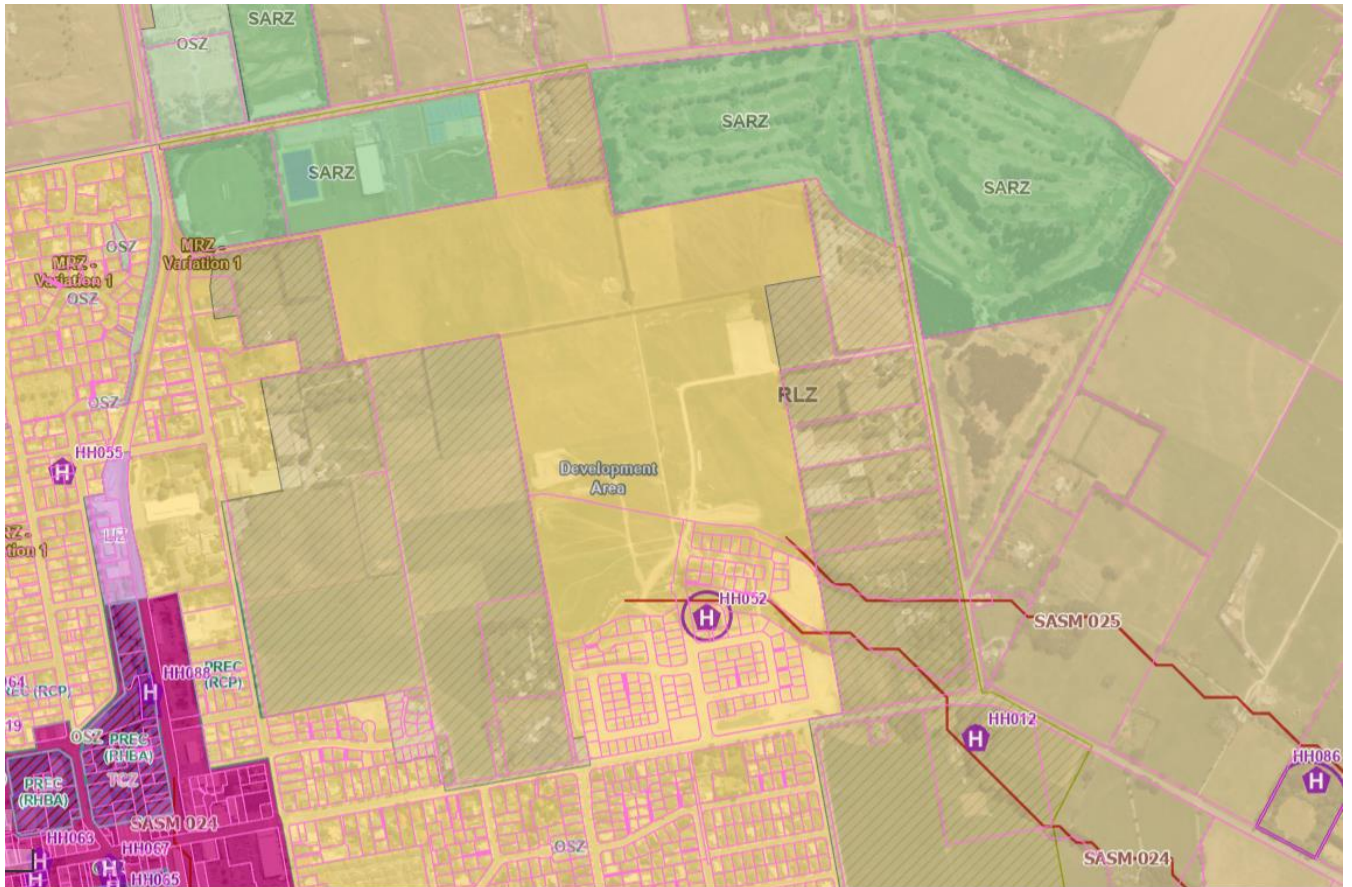


Figure 29 Cultural and heritage aspects in NER

413. There are two Ngā Wai SASMs, SASM 024 and SASM 025, associated with the Rakahuri (025) and the Cam/Ruataniwha River (024) and their tributaries. Ngā Wai SASMs identify “River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species”⁶⁴.
414. There is one significant heritage site – HH052 – which is the old Inch homestead. It is protected and incorporated into the Stage 1 Bellgrove development.
415. Survus Consultants Limited [250.5] seek that the North East Rangiora Development Area to be rezoned for urban development in order to achieve sustainable growth and development of the District, meet the requirements of the NPSUD, and achieve the purpose of the RMA. They request to rezone the entirety of the North East Rangiora Development Area for urban development as General Residential Zone, or other appropriate zoning.

6.2 Bellgrove proposal

6.2.1 Matters raised by submitters

416. Bellgrove Rangiora Ltd [413.2] seek to rezone Bellgrove North from rural lifestyle to:

⁶⁴ <https://waimakariri.isoplan.co.nz/draft/rules/0/240/0/0/0/224>

(a) a mix of Residential General Density Zone and Residential Medium Density Zone generally as shown on the North East Rangiora Outline Development Plan (ODP) and the South East Rangiora ODP or

(b) to Residential Zone, as detailed in the first submission [408] on attachment 3a and 3b, and attachment 4a and 4b and

(c) Commercial / Business Zone as detailed in the first submission [408] on attachment 3a and 3b, and attachment 4a and 4b.

417. Bellgrove's submissions state that these zones are appropriate as:

- *the reasons described in the first submission [408 - especially paragraphs 11-17].*
- *the land is identified as suitable for future greenfield residential development in the CRPS, which will help provide for housing demand in Rangiora.*
- *the land is already identified for residential development in the North East Rangiora ODP and the South East Rangiora ODP.*
- *the land is adjacent to the Stage 1 land that has been accepted under the Covid Fast-track Consenting Act for referral to the Environmental Protection Authority, with physical connections available for transportation and infrastructure routes.*
- *the proposed rezoning will enable a logical extension of the urban form that will be established by development of the Stage 1 land.*

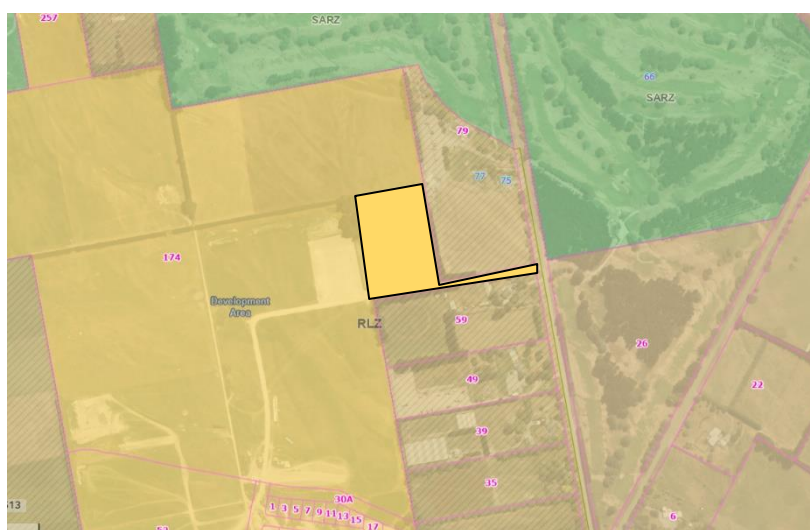


Figure 30 Additional Bellgrove land

418. The Board of Trustees of Rangiora High School [149.1] are generally supportive of the proposed change of land use in the North East Rangiora (NER) development area as they are positive for the wider community that the school serves, and the Board owns land in the NER that is used for equine, agriculture, and horticultural education purposes.

419. This is supported in a further submission by Bellgrove Rangiora Ltd [FS 85] and opposed by Kainga Ora [FS 88].

420. Lamb and Hayward [163.1, 163.2] sought amendments to continue to enable their funeral home to operate given residential expansion around their site. I addressed this relief in hearing stream

10A, and whilst this submitter has not been specifically allocated to this hearing, I consider I can consider the relief again in the context of a rezoning.

6.2.2 Description

421. The Bellgrove North land is currently zoned as rural in the Operative Plan, and proposed to be zoned rural lifestyle under the PDP. It is also proposed to be rezoned to medium density residential under Variation 1.
422. Part of the land, known as Bellgrove North Stage 1, received subdivision and land use consents under the Covid-19 fast track legislation, and is currently being developed. Overall, the developer states that Bellgrove North will achieve about 1200 dwellings overall, about 200 of which have already been consented (on the first 14.8ha).
423. The remaining stages of Bellgrove North are on land owned by Bellgrove North, along with a parcel of land to the west owned by Waimakariri District Council and intended for a park associated with Bellgrove North (3.9ha)⁶⁵, and a potential access way from Coldstream Road (owned by Lindale Holdings, of 2ha). This is largely the land as set out in the maps for Variation 1⁶⁶, and about 53 ha additional. Thus, the total area associated with Bellgrove North is about 70ha overall.
424. As with other relevant residential zones proposed for rezoning to medium density residential under Variation 1. I consider that the land, despite being rurally zoned in the Operative Plan meets the NPSUD definition of plan-enabled⁶⁷ now, by way of s77M(2) RMA which ceases to apply the existing plan or proposed plan provisions, and applies the IPI (Variation 1) provisions instead. Thus I consider the Bellgrove North land that is under the Variation 1 mapping to be plan-enabled.
425. I also consider it to be infrastructure-ready, as services have been provided to the Bellgrove Stage 1 subdivision and which have capacity for the future expansion of this development.
426. This rezoning application is effectively retrospective in relation to the PDP submissions to rezone it that occurred prior to the fast-track consent and the RMAEHA/MDRS.
427. There are residual pockets of land in the development area which are not subject to a proposed rezoning to medium density residential under Variation 1, namely:
 - The area to the east of Bellgrove North, consisting of land owned or managed by the Rangiora High School for the school farm, and Waimakariri District Council as a playing field at the back of the Mainpower sports stadium (34 ha overall).

⁶⁵ This reserve is not proposed for rezoning under Variation 1, and is not mapped as such, but as it forms part of the reserve requirements for Bellgrove North, I have included in the total area calculation.

⁶⁷ CI 3.4 NPSUD, Development capacity is plan-enabled for housing or for business land if: in relation to the short term, it is on land that is zoned for housing or for business use (as applicable) in an operative district plan in relation to the medium term, either paragraph (a) applies, or it is on land that is zoned for housing or for business use (as applicable) in a Proposed Plan in relation to the long term, either paragraph (b) applies, or it is on land identified by the local authority for future urban use or urban intensification in an FDS or, if the local authority is not required to have an FDS, any other relevant plan or strategy. For the purpose of subclause (1), land is zoned for housing or for business use (as applicable) only if the housing or business use is a permitted, controlled, or restricted discretionary activity on that land.

- 249 Coldstream Road, owned by Andrew McCormick, Jane Allen, Stuart Allan (2.1 ha).
- 78 Kippenburger Avenue, owned by Mark Darryn Hawker, Neil Ivan Hawker, Patricia Mary Hawker (2.5ha)
- 92 Kippenburger Avenue, a funeral home, owned by Lamb and Hayward Ltd (1.6ha)
- 96 Kippenburger Avenue, owned by James Alan Wenborn, John Charles Tunnicliffe Wenborn, Melissa Anita Wenborn, Sarah Rose Wenborn (2.03 ha)
- Lot 1 DP 9239, part of the address at 106 Kippenburger Avenue, owned by Kevin Hannah, Rachel Fay Hannah (2 ha)
- These areas add up to about 46.23 ha.
- Without the school farm land, the council reserves, and the funeral home, and the western side of golf links road properties, the additional area is about 10.5 ha
- The school farm land and funeral home, are about 30ha.
- A small area of land at the immediate entrance to Bellgrove North, which is now a road.
- A small existing subdivision in the east, I believe is known as Grey View, as shown below (1 ha, but as it is largely developed already, I have not included it in any future capacity assessments):



Figure 31 Additional subdivision

- Land in this subdivision is owned by the following people or organisations:
 - 29 Grey View Grove, owned by NDM Construction Ltd
 - 31 Grey View Grove, owned by East West Developments Ltd

- 1 Livingstone Place, owned by William Archibald McMullan
 - 2 Livingstone Place, owned by NDM Construction Limited
 - 3 Livingstone Place, owned by R J Eder Builders Ltd
 - 5 Livingstone Place, owned by Cheryl Judson, David Schumacher
 - 7 Livingstone Place, owned by Murray Sinclair, Stephanie Sinclair
 - 4 Livingstone Place, owned by Theckla Barnhill
 - An unaddressed parcel, described as Fee Simple, 1/1, Lot 12 Deposited Plan 589218, owned by Donna Johnstone, Grant Johnstone
 - The right of way in the west is partially owned by all of the above
 - 35 Livingstone Place, owned by Ghislaine Smith, Martin Smith
 - 33 Grey View Grove, owned by Shelagh Taylor
- These properties above have largely been subdivided and developed already.

Golf Links Road properties – treated separately in the next section

- Two parcels of land at 73 Golf Links Road and 79 Golf Links Road, comprising 3.6ha in total, owned by the Rangiora Golf Club Incorporated
- The other properties on the west side of Golf Links Road

6.2.3 Assessment

Natural hazards, geotechnical, three waters

428. Council engineering advice on these⁶⁸ is as follows:

- *Based on existing flood hazard modelling, with careful engineering, the effect of any additional stormwater runoff from a future subdivision to the downstream catchment area can be largely mitigated using onsite and/or offsite attenuation. The ODP should allow flexibility for sizing of stormwater management areas to be confirmed through detailed design at subdivision stage.*
- *There is provision in the WDC 50yr growth strategy for extension of wastewater services to the application site. In summary, there are no known significant wastewater constraints that would prevent the proposed land use.*
- *There is provision in the WDC 50yr growth strategy for extension of water services to the application site. In summary, there are no known significant water supply constraints that would prevent the proposed land use.*

Transport

429. Council's transport engineering advice, from Mr Binder⁶⁹, is as follows:

⁶⁸ Mr Aramowicz, EiC, para 100-114

⁶⁹ Mr Binder, EiC, pg 2

- *I strongly encourage a secondary road network that maximises number of sections with direct road frontage and minimises long driveways and ROW-based development.*
- *I strongly encourage that placement of higher-density MRZ take into consideration the need and benefit of close proximity to public transport and regional cycling links. In this instance, Kippenberger Ave will likely have the only PT service and Grade 1 (highest level) cycleway in the ODP area. Higher density development in close proximity to PT and cycle facilities both increases the number of households that can realistically take advantage of these modes as well as creating higher demand for them.*
- *The ODP needs to include cycle facilities along both Northbrook Rd & Kippenberger Ave frontages to give effect to the Walking & Cycling Network Plan.*

Greenspace and urban design

430. No advice was provided on Bellgrove North as I understand experts considered that the ODP matters for the site have been largely resolved, or are being resolved through consent decision-making in reference to the notified ODP.

Discussion

431. I consider that there are no specific engineering or technical constraints that preclude residential rezoning in the NER development area, noting that development is already underway with stage 1 of Bellgrove⁷⁰, and that the Bellgrove North land is already plan-enabled and infrastructure-ready. The rezoning in this respect can be seen as a retrospective catch-up in response to submissions that were received prior to the land use and subdivision consents.

432. Outside of Bellgrove North, the land is not proposed for medium density residential under Variation 1.

433. On cultural matters, the area contains the headwaters of the Cam/Ruataniwha, and the ODP recognises the stream channels as requiring setbacks and/or esplanade reserve provisions. I note the subdivision matters of control and discretion which should enable the consideration of the requirements that Runanga have requested of subdivisions in this area generally.

434. I note that provided that the Ngai Tahu Freshwater Policy and Mahaanui Iwi Management Plan considerations and requirements are implement through subdivision consenting design, Runanga do not consider themselves to be adversely affected by rezonings in this areas.

435. I note that the two SASMs in the area would likely be better protected and enhanced in the extent covered by the development area in the event of a rezoning.

436. As notified, Variation 1 missed a parcel of Bellgrove Rangiora Ltd land, within the development area, that was intended for residential development. I consider that Bellgrove's requested changes to the NER ODP as contained in Appendix 3C of Ms Ruske-Anderson's EiC⁷¹, within their area of development are minor, reflect the approved subdivision consent ODPs for the various stages of Bellgrove North, and as such, the Variation should be updated.

School farm land

⁷⁰ Land use and subdivision consents under the Covid-19 fast track legislation.

⁷¹ Pg 79-81, Ms Ruske-Anderson, EiC.

437. Apart from Bellgrove North, the other primary landowner in the area is the Rangiora High School, which is a mixture of land owned by the Crown, but managed by the school, and land owned directly by the school board. The land is used for the school farm. I understand that discussions have occurred between the Council, the school, and Bellgrove around the future use of this land in the context of the wider development area. The land appears on the ODP as community and educational future land use, but I note that this is not the same as a future zoning, nor is there any zoning that correlates to this category of future land use. The school itself, on the other side of East Belt from the farm land, is currently residentially zoned, and proposed to be medium density residential. The district has not operated a school or educational zone as such, and I also note that the National Planning Standards 2019⁷² do not have a specific zone for secondary education. Theoretically, the school could be placed within a special purpose zone, but I note that the school has not requested this, and nor has any other school or educational facility in the district.
438. However, the school farm land may at some point be required for development, and is increasingly being surrounded by residential development. I understand that the Ministry of Education and school will want to maintain their future options with respect to this land, particularly if the school is to relocate all or in part. Rezoning the land to medium density, as anticipated by the ODP and development area overlay provides these options. I understand that the Crown is not rated for the land, so rezoning should not create a financial or administrative burden upon the school, nor an application under the rates postponement policy.
439. I have assessed the continuation of the school farm activity against the provisions of the general residential zone, however, the PDP medium density residential also has the same provisions:
- Rule GRZ-R32 sets a non-complying status for primary production⁷³.
 - Rule GRZ-R12 sets a permitted activity for educational facilities, subject to some provisions. The definition of educational facility is as per the National Planning Standards, meaning “land or buildings used for teaching or training by childcare services, schools, or tertiary education services, including any ancillary activities”
440. I consider that as the farm is small, not in full primary production as a commercial entity, it could be considered under the permitted activity rule GRZ-R32, as it forms part of an educational facility. If this interpretation is not preferred, a non-complying resource consent for the site could be tested against the objectives and policies, noting that for many of the development areas, they will not be developed for years, perhaps decades, to come, and will sustain rural or semi-rural land uses in the meantime.

⁷² Pg 17, National Planning Standards 2019, <https://environment.govt.nz/assets/publications/national-planning-standards-november-2019-updated-2022.pdf>

⁷³ Using the National Planning Standard definition of primary production, meaning:

- a. any aquaculture, agricultural, pastoral, horticultural, mining, quarrying or forestry activities; and
- b. includes initial processing, as an ancillary activity, of commodities that result from the listed activities in a);
- c. includes any land and buildings used for the production of the commodities from a) and used for the initial processing of the commodities in b); but
- d. excludes further processing of those commodities into a different product.

- 441. It is also an existing activity in the meaning of s10A RMA.
- 442. I consider that if there is scope within submissions, and the relevant policy tests are met, then either general or medium density residential zoning is available for this land.
- 443. As such, the ODP needs to be adjusted to remove the part of the community/educational overlay that is intended for residential development as part of Bellgrove. This also reflects my recommendation in Stream 10A for Option B⁷⁴. At some future point if the school farm land is to be developed, the ODP would be inconsistent with this, but narrative text in the ODP could explain this.

Other parcels

- 444. Of the other parcels of land, all but two appear to have anticipated rezoning, or already have residential dwellings on them. I discuss the other parcels below:

92 Kippenburger Avenue



Figure 32 Lamb and Hayward

- 445. This is a funeral home owned and operated by Lamb and Hayward Limited. They undertake ceremonial funeral services, but as I understand it, no cremation takes place on site. They are concerned about reverse sensitivity, and have expressed this in their district plan submission, which was considered in stream 10A.
- 446. I note that much of their remaining open-space outlook comes from the rural lifestyle land use at 78 Kippenburger (on their northern boundary), and the school farm land on their western

⁷⁴ Para 293, Peter Wilson, s42A hearing stream 10A

boundary. All of this land is within the development area overlay. The smaller parcels of land at 96 and 102 Kippenburger will have anticipated being rezoned. If 78 Kippenburger is rezoned and develops, this leaves a relatively narrow view shaft to the northwest, which is a smaller open space outlook than what the site traditionally had, prior to the Bellgrove development. If the school land ceases its use for the school farm, and is also developed, then there is no open space outlook at all.

447. I have considered measures such as precinct zoning to address the concerns raised by Lamb and Hayward in respect of their site, or changes to the ODP to place some restriction on development to the NW, such as a future park, but I consider that on balance, the cost of protecting something of an open space outlook on a relatively narrow viewshaft to the remaining open space land, versus the reverse sensitivity issues⁷⁵ that may arise on all the other boundaries does not outweigh the benefits. I also note the potential for the school farm land to develop in the future.
448. Further restrictions on the ODP or otherwise may actually hamper the land use changes that may need to occur in the future for the funeral home. I consider that if becomes too difficult to remain on the current site, and movement to another location is required, then the landowner should have the full benefit of selling the land as residential without constraints based on the current land use. This is the benefit that other landowners in development areas are receiving if rezoned.
449. I have considered the proposed general residential zoning against the objectives and policies for the general residential zone, noting that the same provisions exist for the PDP medium density residential zone as well. Rule GRZ-R33 sets a non-complying activity status for funeral related services and activities. This definition includes the memorial service component of funeral activities.
450. However, I consider that under s10(1) RMA, it has existing use rights, as it was lawfully established prior to the rule becoming operative, provided that the effects of the use are the same or similar in character, intensity, and scale to those which existed before the rule became operative or the proposed plan was notified, and that the activity continues without a break of longer than a year. The funeral home would meet all of these existing use requirements.
451. I thus consider that the Lamb and Hayward site at 92 Kippenburger Avenue is available for rezoning to residential.

Overall consideration

452. I can consider the proposal under interpretation approach 2, which requires assessment against Policy 8, NPSUD. I consider that:
- The area provides significant development capacity, both in the context of the additional stages of Bellgrove North, and also with the other areas within the development areas.
 - The area contributes to a well-functioning urban environment, as it has been anticipated and planned for.
453. The primary test for rezoning on this land is CRPS Policy 6.3.12, with its specific tests that apply to the use of land within future development areas.

⁷⁵ With a funeral home, reverse sensitivity issues can arise in all directions

- The area is of low flood hazard.
- Provided that development occurs according to the recommended ODPs, it would achieve a consolidated and integrated urban form.
- Infrastructure can be efficiently and economically provided to it.
- The block of land has a primary developer, who is already actively undertaking stage 1 of their development, and as I understand it, in preliminary work for stages 2-5 which occur across the rest of the shaded land in the maps above.
- The remaining land is available for inclusion within Bellgrove or separate development, according to the overall ODP.

454. I note that the capacity tests in 6.3.12(1) are to provide for medium term demand only. However, in the context of an NPSUD, at least sufficient test, I do not consider that I am limited to providing for medium term demand only, and can consider long-term demand. I note that I do not consider there to be a short to medium term shortfall in supply in the district.

455. I assess the scope for rezoning from the submissions below:

Submitter	Number	Land Included in submission	Zoning sought
Bellgrove Rangiora Ltd	413.2	“Bellgrove North”, which is land owned by Bellgrove Rangiora Ltd.	a mix of Residential General Density Zone and Residential Medium Density Zone generally as shown on the North East Rangiora Outline Development Plan (ODP) and the South East Rangiora ODP or (b) to Residential Zone, as detailed in the first submission [408] on attachment 3a and 3b, and attachment 4a and 4b and (c) Commercial / Business Zone as detailed in the first submission [408] on attachment 3a and 3b, and attachment 4a and 4b.
The Board of Trustees of Rangiora High School	149.1	The school land, owned by the Board itself and also the Ministry of Education land managed by the school board	Supportive of change of land use

Survus Consultants Limited	250.5	All of the north-east Rangiora development area	General Residential Zone, or other appropriate zoning
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456. I have not included the Lamb and Hayward submission in the table above, as I do not consider it specific to rezoning. I have assessed this more as a matter of an effect to consider.
457. I consider that there is scope to consider upzoning of the entire block of land, as all land within it is captured by a specific or general submission.
458. I note that the ODP for the area signals a mixture of general and medium density residential future land use, but mostly general residential.
459. The primary difference between general residential and PDP medium density residential is height⁷⁶ and allotment size. General residential is 8m, or two storeys, and PDP medium density residential is three storeys. Whilst this area is not surrounded by existing residential areas, except on the western boundary, I am conscious of the height difference permitted by the zones, and particularly in the context of the built form to the west which permits up to two-storeys, I recommend this integration matter to be considered in hearing stream 7.
460. For me, the more substantive matter is the allotment size, with the PDP medium density zone permitting 200m² allotments, versus 500m² for general residential. Noting the requirements in SUB-S3 to achieve a minimum density of 15 households per ha, except where demonstrated constraints occur, in which case, no less than 12 households per ha. I consider that the 500m² allotment limitation for the general residential zone would not enable this SUB-S3 requirement to be met, as a permitted activity.
461. I thus recommend that the North East Rangiora development area (apart from Golf Links Road, which is considered below) is rezoned to PDP medium density residential.
462. I recommend that the Lamb and Hayward funeral home and the school farm land is similarly rezoned to general residential.
463. For the other small parcels of land in the development area, I am also supportive of rezoning them as they are within the development area overlay, and will have anticipated it.
464. Overall, I recommend that the entirety of the development area (except for the Golf Links Road parcels, which are discussed below) is rezoned as PDP medium density residential, with the following changes occurring:
- That Option A is deleted from the ODP text
 - That the ODP maps for the NER development area are updated to reflect the approved Bellgrove subdivision consent ODPs.

6.2.4 Recommendations

465. That the following outcomes for submissions occur:
- Further submission Kainga Ora [FS 88] is **rejected**

⁷⁶ Built form standard GRZ-BFS4 sets 8m, or two storey, height limits, except for on large sites above 6000m² where 12m, or three-storey, with at least a 10m setback.

- Survus Consultants Limited [250.5], Bellgrove [413.2], Board of Trustees of Rangiora High School [149.1] are **accepted**
- Further submission Bellgrove Rangiora Ltd [FS 85] is **accepted**

6.2.5 Plan-enabled capacity arising from this recommendation

466. I am not including the Bellgrove North development within this assessment of additional capacity, as it is already captured within the Council's LUMS survey, as it is currently plan-enabled.
467. I am also not including the school farm and funeral home land in any assessment of capacity, however it may become available in the future.
468. I assess the smaller parcels only.
- The smaller parcels would not require any reserves, other than roading, and roading requirements for these are likely to be at the lower end of the District's performance in this regard, at about 10-15%, which is about 1.5ha overall, making for 9 ha of land available for residential development.
 - Thus the reserve requirements are about 4.72 ha, out of a total area of 11.85 ha, making for 7.1 ha of land I can currently assess for potential plan-enabled capacity following the rezoning recommendations.
 - As these smaller parcels are surrounded by more dense developments, and proposed to be rezoned as a medium density residential under Variation 1 (with no minimum lot size), I have assessed them in a range of between 800m² to 200m².
 - They would likely achieve higher densities than this.
 - A lower bound of 800m² lot sizes, results in about 94 additional lots
 - An upper bound of 350m² lot sizes, resulting in about 375 additional lots, representing a full MDRS scenario.
 - An average, resulting in 234 additional lots.
 - Higher densities are unable to be achieved here at this point in time, as the area would require further upzoning through a plan change.

6.2.6 Amendments

469. I proposed the following amendments arising from recommendations in this section
- That the planning maps for the area are changed to rezone it as PDP medium density residential
 - That Option A is deleted from the ODP text
 - That the ODP maps for the NER development area are updated to reflect the approved Bellgrove subdivision consent ODPs.

6.3 West side of Golf Links Road properties

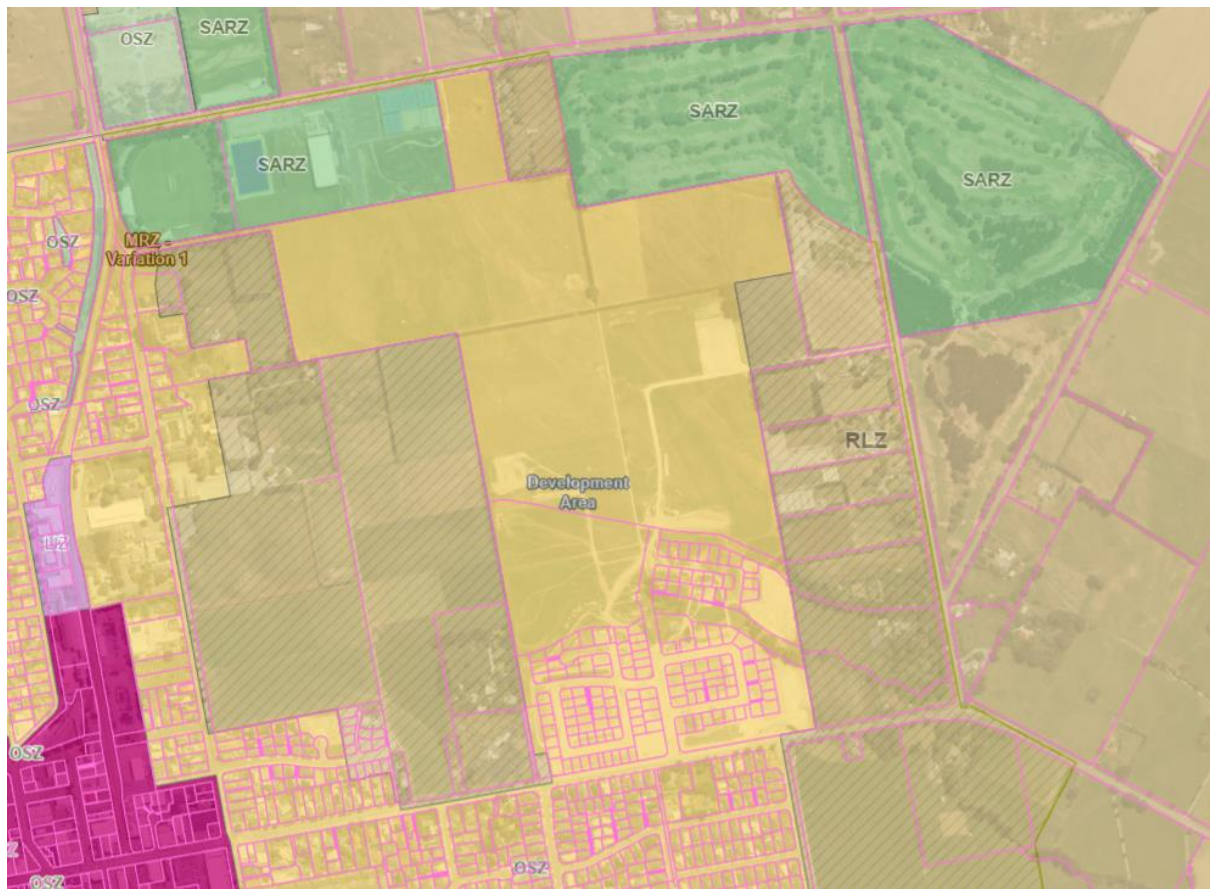


Figure 33 West side of Golf Links Road (east of the yellow shaded area)

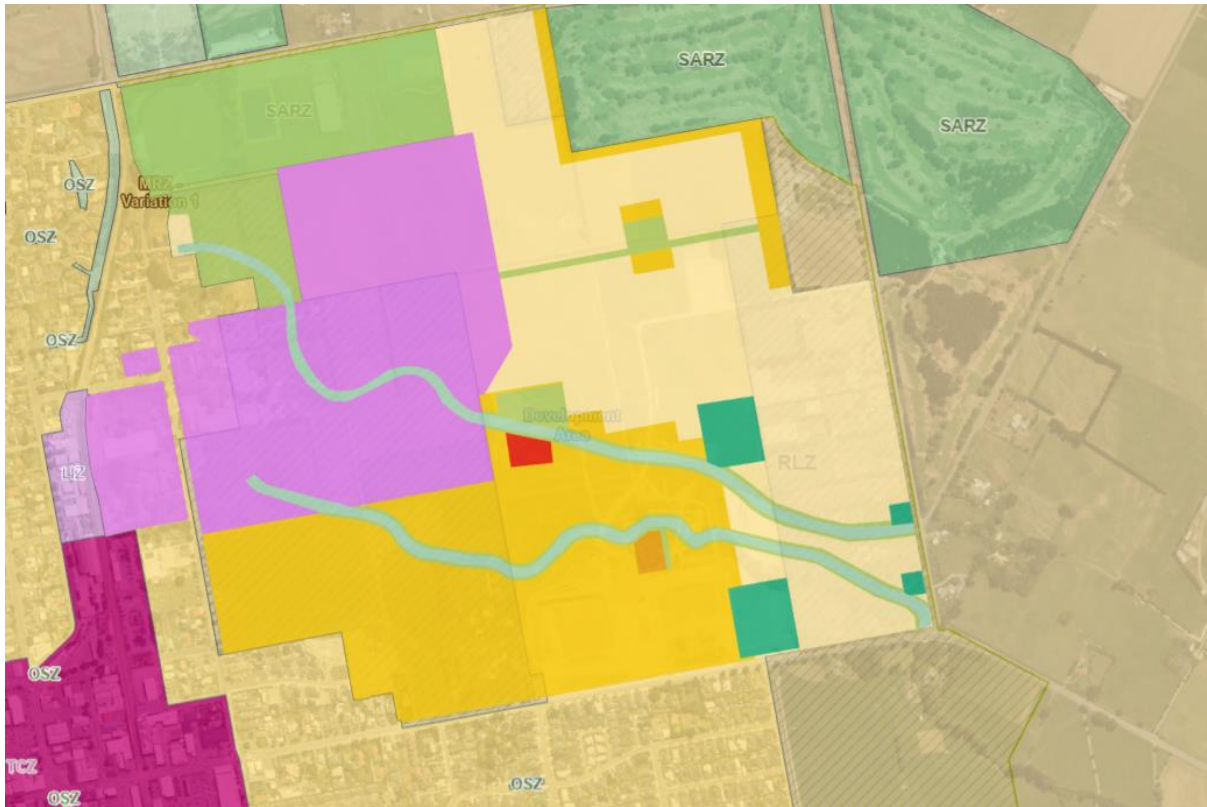


Figure 34 North East Rangiora ODP

6.3.1 Description and Matters raised by submitters

470. The western side of Golf Links Road consists of 6 lifestyle properties, currently zoned as rural in the Operative Plan, proposed to be rural lifestyle, but within the development area overlay. There is an additional property owned by the Rangiora Golf Club. The total area is about 16ha

471. This area is:

- Currently zoned as rural in the operative district plan;
- Proposed in the PDP as RLZ;
- Within the projected infrastructure boundary, as set out in Map A of the CRPS;
- Within the North East Rangiora new development area in the PDP, and the North East Rangiora FDA as set out in Map A, CRPS; and,

472. Submissions on rezoning have been received from James Lennox (59 Golf Links Road), David Whitfield (39 Golf Links Road), Carolin Hamlin (35 Golf Links Road), Nick Thorp (7-8 Golf Links Road). Of these submitters, all are in support of rezoning apart from Nick Thorp, who is either opposed or has serious reservations.

- Submissions have not been received from the remaining two private landowners, Carl Goodwin at 49 Golf Links Road, and Momokai Investments Ltd (Randall Inch) at 19 Golf Links Road, but they attached documents to submissions presented by Carolin Hamlin at the stream 10A hearing indicating that they were in support of rezoning.
- No submissions have been received from the Rangiora Golf Club Incorporated.

473. Carolin Hamlin [314.1] request to rezone their property at 35 Golf Links Road as a development area, and for stormwater, sewage, and water to be provided to the boundary via their western boundary (with the Bellgrove development), rather than via Golf Links Road.
474. David Whitfield [96.1] opposes the proposal of water, sewage, and stormwater provision via or by Golf Links Road, and requests to provide water, sewage, and stormwater to Golf Links Road from the proposed subdivision. He has clarified that his submission be treated as a rezoning submission for his property at 39 Golf Links Road.
475. This is opposed by Bellgrove Rangiora Ltd [FS 85] and supported by Rachel Hobson and Bernard Whimp [FS 90].
476. James Lennox [313.1], at 59 Golf Links Road, is not opposed to the rezoning of land in the North East Rangiora Development Area, provided Council takes responsibility for sewerage and water infrastructure required for future development. He submits that he is not happy to lose the rural aspect, but understands the need for development and appreciate rezoning will likely increase land value, however would like assurance that rezoning will not mean an increase in rates to pay for installation of services for properties on Golf Links Road and/or the eastern properties of the Inch farm development. He would also like to know if the Council plans to install this infrastructure down Golf Links Road, or between the submitter's property and the Inch property. He seeks confirmation that if the properties are rezoned, the cost of future sewer and water mains is covered by the Council, and/or the major developer of the Inch farm.
477. This is opposed in a further submission by Bellgrove Rangiora Ltd [FS 85], and supported by Rachel Hobson and Bernard Whimp [FS 90].
478. Nick Thorp [109.1] submits the following:
- Submitters own 7 Golf Links Rd and 8 Kippenberger Ave and are disproportionately disadvantaged by DEV-NER-APP1's requirement for a green link to sleeve both sides of the flow paths to enable planting and walking/cycling paths.
 - Concerned that stormwater will discharge into Taranaki Stream and Cam River. Concerned about statement that a third large catchment requires a new pump station at the south-eastern point of the Development Area. This is on private property which includes a stormwater reserve. The area required for the items, esplanade, and path uses all the property's land making it worthless. Assume this an error as it is not located near the catchment it references.
 - Concerned about lack of detail around setback between the development and neighbouring properties.
 - Maintain boundary and lack of access between the Cam River source/spring and development.
 - The two smaller stormwater basins to service the smaller catchments of development of properties at the eastern edge of the site are both on submitter's property and are disproportionately affected by removal of land without compensation or contribution from landowners benefiting from subdivision.

- Runoff between Cam River and Taranaki Stream will not reach the smaller catchment area. This would require giving up at least 20% of 7 Golf Links Rd and 30% of 8 Kippenberger Ave.
- Subdivision would lose direct access to the stream. Taranaki Stream does not flow. Submitter had assurances that this would be removed from the plans. Concerned about stormwater discharge into it.
- Seek clarity on positioning and drain proposals into Cam River heads.
- Cam River is dry on the property to be developed, this would modify it from a spring to artificially receiving stormwater discharge.
- Artificial flows affect current land use and contradicts statement about maintaining flow quantities into waterways for ecological reasons.
- Lack of details on functioning of stormwater catchments. Concerns about overflow. Dirty stormwater and wastewater will discharge into Cam River source which contradicts the statement that waterbodies must be protected intact, or improved, as part of development.
- Oppose any water collecting and discharge onto 8 Kippenberger Ave.
- North East Rangiora Development Area are assumed could be dry basins, allowed by well-draining land. Alternative solutions for stormwater management could be proposed, provided meaning there is no alteration to the flow of water into the Taranaki Stream and Cam River or neighbouring properties are maintained and all future lots in the stormwater catchments can discharge into the appropriate basins."
- Haven't made comments on this section as it appears to have some fundamental issues. The pump station at the south-east point of the development area is positioned a long way from the large catchment.
- A third large catchment to the east of the Development Area requires a new pump station at the south-eastern point of the Development Area and pumped into a new rising main to Northbrook Road, where it would join onto a rising main to the treatment plant.
- The boundaries of the Cam River on the maps are off and create confusion regarding the size of the reserve, especially the large one bordering Kippenberger. Given concerns about stormwater mixing with the waters at the head of the Cam, the positioning the catchment is important.
- Submitters are disproportionately affected in options for their land. The esplanade requirements entail surrendering over 20% of one property and 30% of another. Seek mitigating or sharing impact over a wider group of property owners, including residents of the proposed development.

6.3.2 Assessment

479. Council obtained engineering advice from WSP on these sites, as attached in the technical evidence. Council engineering advice is:

Natural hazards, 3 waters

- *In summary, there are no known significant risks from natural hazards that would prevent the proposed land use.*
- *In summary, there are no known significant geotechnical matters that would prevent the proposed land use.*
- *In summary, the WSP report indicates onsite SW treatment and disposal into ground is preferred by Council, but further site investigation and detailed engineering design will be required. This can be provided at time of application for subdivision consent.*
- *In summary, there are no known significant wastewater constraints that would prevent the proposed land use.*
- *In summary, there are no known significant wastewater constraints that would prevent the proposed land use.*

Transport

480. Mr Binder makes the following comments:

- *I note the Golf Links Rd frontage will require substantial urbanisation, likely to include a shared use path to give effect to the Walking & Cycling Network Plan.*
- *The intersection with Rangiora-Woodend Rd and Kippenberger may continue to operate within acceptable vehicular levels of service (although I have not undertaken a quantitative assessment to validate this). However, I consider it will likely require improvements to improve safety (given the presently high inbound speeds on Rangiora-Woodend Rd, the angled approach geometry, and sight-line constraints) and walking/cycling connections to the Rangiora-Woodend Path. These improvements could range from a series of raised islands to a roundabout.*
- *Should these properties develop, it would be best to minimise the number of access points onto Golf Links Rd, given its relatively higher speed environment, and channelise most new traffic west through future Bellgrove development and east through limited road intersections to Golf Links Rd. This east-west connectivity should be included in future planning at Bellgrove.*

Greenspace

481. Mr Read makes the following comments:

- *In any residential development of this area, 20-metre-wide esplanade reserve provision is a District Plan requirement along both sides of the Cam River waterway.*
- *The Taranaki Stream corridor further to the north will also require adequate stream bank margins to facilitate drainage maintenance access, public access and ecological restoration.*
- *The likely population of this area, if zoned residential, will also trigger a requirement for a small neighbourhood park (minimum 0.3ha). If the site is developed by Bellgrove, this park could be considered in a wider provision context i.e. location could potentially be within or outside of the site as long as it meets community accessibility requirements for the intended catchment area.*

Discussion:

482. I note that there are no technical constraints to rezoning the land. Wastewater servicing can be provided via the existing sewer on Kippenburger Avenue, with a pump station at the low point at the Cam River bridge, and reticulated water can also be provided from that point. It can also be provided through the Bellgrove servicing to the west, which I note is the option requested by submitters.
483. Mr Thorp has outlined his opposition to rezoning on the grounds that about 20-30% of his property is required for the stormwater management area, esplanade reserves, and overlays. However, as the bulk of the stormwater is now being treated west of his land, this requirement would reduce to either just the stormwater from any development in Golf Links Road, if this occurred independently of Bellgrove, or just stormwater from a development on that parcel alone, if the other Golf Links Road properties were to handle stormwater separately.
484. The additional Council owned parcel of land immediately west of 19 Golf Links Road, which is in place to receive stormwater from the additional stages of the Bellgrove development has capacity to also receive stormwater from those Golf Links Road properties that are upslope from it, which is probably all of them apart from 7-8 Golf Links Road. However Council engineering advice does also not specify the need for a collective stormwater system for these properties, although one is available if required.
485. The ODP outlines that Mr Thorp's property is required for stormwater management purposes as this is the lowest point in the development area. Bellgrove North now have their stormwater management area on their own land slightly west of where it is outlined in the ODP, and as such, Council advice is that this collective stormwater management area is no longer required.
486. I understand Mr Thorp's concern about having less land available for residential development in the event he was rezoned and chose to develop, due to the siting of his property adjacent to the Cam River, however, the usual course of actions in these situations is for this to be taken into account in any negotiations with a developer in adjusting the sale price of the land and making up any difference over the collective of properties, but such a collective approach to development, whilst desirable, cannot be forced.
487. I also note a historical site, the Cam Mill, which should be recorded on the ODP, in the event the site changes ownership or is developed. The Cam Mill predates 1900, and as such is an archaeological site in the meaning of the Heritage New Zealand Pouhere Taonga Act 2014.

Rangiora Golf Club

488. The golf club land consists of their clubhouse and parking, rather than the golf course itself (which is zoned as SARZ, and is a recreation reserve). As with other landowners, the ability to subdivide land to medium density will have been anticipated, and I can see no resource management reason to otherwise exclude this land from the medium density residential zone.
489. Individual land and purchase decisions are not normally a resource management matter, but I am conscious that in the context of a not-for-profit incorporated society, that a zoning recommendation should not impose an administrative burden on them, nor on Council, in terms of being in the incorrect zone, and requiring ongoing future work, such as rates postponement or future plan alignment, to address. If a recommendation on zoning is made now, I would prefer it. I propose the following options:

- Option A – rezone all of the Rangiora Golf Club property to residential.
- Option B – rezone half of the Rangiora Golf Club property to residential, and put another zone, probably SARZ, on the remainder of the property.
- Option C – do not rezone any of the Rangiora Golf Club property, which would leave it remaining as a development area in a residual parcel of rural lifestyle.

490. The golf club land does not have a future residential land use signalled in the ODP for the area. However I consider that as it is within the development area, and covered by the Survus general submission, there is scope to recommend rezoning it.

Overall recommendation

491. I assess the scope for rezoning from the submissions below:

Submitter	Number	Land Included in submission	Zoning sought
Carolyn Hamlin	314.1	35 Golf Links Road	Requests to rezone to a development area
David Whitfield	96.1	39 Golf Links Road	Supports rezoning
James Lennox	313.1	59 Golf Links Road	Supports rezoning
Nick Thorp	109.1	7-8 Golf Links Road	Opposes rezoning
Survus Consultants Limited	250.5	All of the north-east Rangiora development area	General Residential Zone, or other appropriate zoning

492. I consider that there is scope to consider upzoning of all of the properties on the West side of Golf Links Road, as all land within it is captured by a specific or general submission. I consider that these submitters have used the term “rezoning”, or “development area” to mean “residential”. This was made clear to me from Ms Hamlin’s comments on the matter at the Stream 10A hearing.

493. I note that the ODP for the area signals general residential future land use for these properties, apart from the golf club land.

494. The area is currently primarily zoned as rural. It is proposed as rural lifestyle, with a development area overlay. A component of it has been proposed to be rezoned as medium density residential under Variation 1 (Bellgrove North). It is identified as a future development area under Map A of the CRPS. Development is already occurring on the western boundary of these Golf Links Road landowners.

495. I can consider the proposal under interpretation approach 2, which requires assessment against Policy 8, NPSUD. I consider that:

- The area provides significant development capacity, both in the context of the additional stages of Bellgrove North, and also with the other areas within the development areas.
- The area contributes to a well-functioning urban environment, as it has been anticipated and planned for.

496. I then need to satisfy the requirements of CRPS Policy 6.3.12 in the context of the responsive planning provisions. I have considered the requirements of this policy in the context of rezoning submissions in this development area as follows:
- The area is at low risk of flood hazard.
 - Provided that development occurs according to the ODP, it would achieve a consolidated and integrated urban form.
 - Infrastructure can be efficiently and economically provided to it.
 - There is an identified shortfall in long term greenfields capacity within the District, justifying the release of land from the future development areas, which were intended for this purpose.
 - I note that the capacity tests in 6.3.12(1) are to provide for medium term demand only. However, in the context of an NPSUD, at least sufficient test, I do not consider that I am limited to providing for medium term demand only, and can consider long-term demand. I note that I do not consider there to be a short to medium term shortfall in supply in the district.
497. The primary difference between general residential and PDP medium density residential is height⁷⁷ and allotment size. General residential is 8m, or two storeys, and PDP medium density residential is three storeys. Whilst this area is not surrounded by existing residential areas, except on the eastern boundary, I am conscious of the height difference permitted by the zones, and particularly in the context of the built form to the west which permits up to two-storeys, I recommend this integration matter to be considered in hearing stream 7.
498. For me, the more substantive matter is the allotment size, with the PDP medium density zone permitting 200m² allotments, versus 500m² for general residential. Noting the requirements in SUB-S3 to achieve a minimum density of 15 households per ha, except where demonstrated constraints occur, in which case, no less than 12 households per ha. I consider that the 500m² allotment limitation for the general residential zone would not enable this SUB-S3 requirement to be met, as a permitted activity.
499. The Golf Links Road landowners are currently subject to reverse sensitivity issues with the Bellgrove development on their western boundary, which has significantly altered the rural amenity they once enjoyed on their properties. This boundary issue has occurred from Stage 1 of the Bellgrove North development, so as further residential dwellings are developed in subsequent stages, the boundary issues will likely continue, or worsen from the perspective of the Golf Links Road landowners. I note Mr Thorp's oppositions or reservations to rezoning, but I consider that the future use for the land as a residential zone has been well-signalled, and that some of the concerns, such as use of the land as a stormwater management area, may no longer be an issue, as the stormwater management area for Bellgrove North stage 1 has now been provided to the west of his property.
500. I note that this would take the Rangiora eastern boundary to Golf Links Road.

⁷⁷ Built form standard GRZ-BFS4 sets 8m, or two storey, height limits, except for on large sites above 6000m² where 12m, or three-storey, with at least a 10m setback.

501. I consider that the boundary along Golf Links Road would integrate well with the proposed boundaries for the development area further south, as the bottom of Golf Links Road aligns with the Cam River/Ruataniwha at the Rangiora-Woodend road bridge, and my recommended boundary for the south-east development area is to follow the Cam/Ruataniwha, for the most part.
502. I thus recommend that the fee-simple properties⁷⁸ on the west side Golf Links Road are rezoned to PDP medium density residential.
503. I note the requested requirements from Mr Binder and Mr Read to:
- Provide a shared use pathway alongside Golf Links Road after it urbanises
 - If connected from Golf Links Road, minimise the number of access points.
 - Provide a neighbourhood park, of 0.3 hectares, noting that if connections are provided across either of the streams, this may be provided in Bellgrove North.
 - Provide esplanade provisions along Taranaki Stream.
504. I recommend that the area is rezoned to PDP medium density residential, with the following additions to the ODP:
- That narrative text is added to the NER ODP for the western side of Golf Links Road area as follows:
 - Minimising access points to 3 or less.
 - Provision for a shared pedestrian and cyclepath.
 - Ensuring esplanade strips on Taranaki Stream.
 - Recognising that existing trees and vegetation could form part of any new developments.
 - The notified ODP has to be extended north to cover all of Rangiora Golf Club Incorporated property.

6.3.3 Recommendations

505. That the following outcome for submissions occurs:
- Nick Thorp [109.1] is **rejected**
 - Further submitter FS Bellgrove Rangiora Ltd [FS 85] is **rejected**
 - Carolin Hamlin [314.1], David Whitfield [96.1], James Lennox [313.1], Survus Consultants Ltd [250.5] are **accepted**
 - Further submitter Rachel Hobson and Bernard Whimp [FS 90] is **accepted**

6.3.4 Plan-enabled capacity arising from this recommendation

506. Of the 16 ha gross area available for development, I note the following:

⁷⁸ The golf course land itself is recreation reserve, vested in the Waimakariri District Council, and is proposed for sport and recreation zone (SARZ). It is not under consideration for rezoning to residential.

- Mr Jolly’s recommendation for a neighbourhood park of 0.3ha
- Esplanade reserves required on the Taranaki Stream and Cam/Ruataniwha Rivers, of about 1ha overall.
- The smaller parcels would not require any reserves, other than roading, and roading requirements for these are likely to be at the lower end of the District’s performance due to ready access to Golf Links Road, at about 15% (2.4ha), making for about 3.7ha overall, making for 12.3 ha of land available for residential development.
- As these smaller parcels are surrounded on their western edge by medium density residential zoning at Bellgrove North, but still contain existing dwellings on larger footprints, I have assessed them in a range of between 800m2 to 200m2.
- They may likely achieve higher densities than this.
- A lower bound of 800m2 lot sizes, results in about 104 additional lots
- An upper bound of 200m2 lot sizes, resulting in about 385 additional lots
- An average scenario, resulting in 248 additional lots.
- I note that WSP⁷⁹, in addressing servicing for the site, assessed an MDRS scenario of 442 dwellings for the area.

6.3.5 Amendments

507. I propose the following amendments:

- That the planning maps for the fee simple properties⁸⁰ on the west side of Golf Links Road are rezoned as PDP medium density residential.
- That narrative text is added to the NER ODP as follows:
 - Minimising access points to 3 or less.
 - Provision for a shared pedestrian and cyclepath.
 - Ensuring esplanade strips on Taranaki Stream.
 - Recognising that existing trees and vegetation could form part of any new developments.
 - The notified ODP has to be extended north to cover all of Rangiora Golf Club Incorporated property.

⁷⁹ Pg 7, WSP servicing report for west side of Golf Links Road

⁸⁰ The golf course itself is recreation reserve, vested in the Waimakariri District Council under the Reserves Act, and currently zoned as open space. It cannot be rezoned as part of this process.

6.4 Hobson and Whimp (4 Golf Links Road)

6.4.1 Matters raised by submitters



Figure 35 Hobson and Whimp proposal

508. Rachel Hobson and Bernard Whimp [179.1,179.2] seek to include 518 Rangiora-Woodend Road and 4 Golf Links Road within a development area. This is opposed in further submissions from Marcus Obele [FS 39] and supported by Rachel Hobson and Bernard Whimp [FS 80].

509. This area is:

- Currently zoned as rural in the operative district plan;
- Proposed in the PDP as RLZ;
- Outside of the projected infrastructure boundary, as set out in Map A of the CRPS;
- Outside of any existing development area or FDA; and,
- Does not have an ODP for the site within the operative or Proposed Plan.

6.4.2 Assessment

510. I am interpreting this submission as seeking rezoning for 4 Golf Links Road and 518 Rangiora-Woodend Road on the basis of their submitted expert evidence. 518 Rangiora-Woodend Road is owned in trust by a family trust consisting of the submitters as two of the three trustees, and these submitters are also the beneficiaries of the trust. There is a third beneficiary who is not a trustee, who resides in the dwelling at 518 Rangiora-Woodend Road.
511. The property at 4 Golf Links Road is owned by Henry McKay, whom as I understand from communication with the submitter's consultants, is a friend of the trustees.

Natural hazards and Geotechnicals

512. Council summary advice from Mr Aramowicz is:

- *No peat was encountered by the geotechnical investigation.*
- *The Eliot Sinclair (ES) geotechnical report concludes the soils at the site are liquefiable, and in several places the ES testing indicates there is a moderate to high risk of liquefaction. ES conclude equivalent TC2 land performance is generally predicted for the site. ES do not propose any specific rules for the geotechnical conditions. I agree that the site can be suitable for the proposed land use, albeit that geotechnical conditions will need to be imposed as a condition of subdivision consent to ensure the risk from liquefaction is mitigated - as is normal practice.*
- *Current flood hazard mapping on WDC's GIS for a 0.5% AEP event (i.e. 200 yr ARI) and for the Ashley River breakout scenario indicates the site is entirely within an area of very low flood hazard. There is no significant existing risk from surface inundation.*
- *In relation to the risk of inundation that could arise from a future residential development of the site, flood modelling by Eliot Sinclair assumed a subdivision of the site would require filling of the land to create adequate falls for drainage. Modelling of their conceptual site layout indicates, that even with diversion swales at the west and northeast boundaries, and with onsite attenuation of stormwater, the proposed development could result in stormwater levels at the downstream boundary increasing by between 60~100mm, while stormwater levels to the land immediately north and west of the site could be subjected to short term increases of between 225mm (west) and 410mm(north). I consider this a significant increase.*
- *The location of existing dwellings on adjacent properties can be identified on the Eliot Sinclair modelling, which confirms the temporary increase in flood depths are largely contained in existing alluvial depressions and are unlikely to cause inundation to the existing building platforms.*
- *There is a risk of liquefaction that will need to be addressed at time of subdivision.*
- *Based on the Flood Impact Assessment by Eliot Sinclair, I expect that with careful engineering, the effect of any additional stormwater runoff from a future subdivision to Taranaki Stream and/or the Cam River (and therefore the Silverstream/Kaiapoi area) can be largely mitigated using adequately sized diversion swales and onsite attenuation of stormwater runoff.*

Wastewater, Water

513. Mr Aramowicz makes the following comments:

- *The area will be provided with services as part of the works to service the Bellgrove development, and WDC can provide additional capacity to service Golf Links Rd. In summary, there are no known significant wastewater constraints that would prevent the proposed land use.*
- *The area will be serviced [with potable water] as part of works for Bellgrove. WDC can provide additional capacity to service Golf Links Rd.*

Transport:

514. Mr Binder comments:

- *This site is located adjacent to existing bus, walking/cycling, and vehicular routes on Rangiora-Woodend Rd so is thus well served by all modes. I do note it is some distance (2.5km) to the town centre and (3.0km) to nearby schools, but is still generally considered to be appropriate for non-car travel.*
- *At present Rangiora-Woodend Road is a high speed rural road with sight distance limitations around the corner at Golf Links Road, so I would recommend that the existing property access (#518) be closed and no more than one new access be permitted to Rangiora-Woodend Road. I consider any access to side roads (e.g., through 4 Golf Links Rd or 6 Marchmont Rd) to have fewer traffic safety risks.*
- *I consider it important that should any development occur in this area, that future connectivity to the north and east be allowed for.*

Greenspace:

515. Mr Read comments:

- *Assessed in isolation a rezoning of this site to General Residential does not trigger the provision of a public neighbourhood park. As a proposed satellite development within a currently rural zone, the population catchment will likely be less than the 250-300 residents required to trigger public park provision for the community. It is difficult for Council to efficiently and effectively plan for – or commit to – public community green space provision in outlying or isolated sites where future surrounding growth is uncertain or disconnected. Investment without the discipline and guidance of wider Structure and Outline Development planning is prone to risk and unsatisfactory outcomes for both Council and the subject community. For this reason, outlying stand-alone residential zones with limited access to key community resources such as parks are not advocated.*

Urban design and greenspace

516. I did not seek specific urban design and greenspace advice for this rezoning request, as I considered it a relatively small rezoning request, where such matters would be addressed in any subdivision consent following rezoning.

Cultural

517. Specific cultural advice for this site was not sought, however, I will consider the advice received for the general north-east Rangiora area.

518. On cultural matters, the area contains the headwaters of the Rakahuri River, and the ODP recognises the stream channels as requiring setbacks and/or esplanade reserve provisions. I note the subdivision matters of control and discretion which should enable the consideration of the requirements that Runanga have requested of subdivisions in this area generally.
519. I note that provided that the Ngai Tahu Freshwater Policy and Mahaanui Iwi Management Plan considerations and requirements are implement through subdivision consenting design, Runanga do not consider themselves to be adversely affected by rezonings in this areas.
520. I note that the one SASM (025 - Rakahuri) in the area, which intersects the 4 Golf Links Road property, would likely be better protected and enhanced in the extent covered by the development area in the event of a rezoning.

Applicants

<u>Person/Organisation</u>	<u>Evidence type</u>
Mr Nicholas Harwood	Geotechnical
Mr Phillippe Dumont	Contaminated Land
Mr Bryan McGillan	Planning
Ms Stephany Pandrea	Flooding
Mr Andrew Leckie	Transport
Ms Natalie Hampson	Economics
Mr Jade Macfarlane	Urban Design

Discussion

521. On flooding and stormwater, Ms Pandrea⁸¹ for the applicant, has assessed the likely pre development and post development flooding scenarios, noting the following:
- *The Taranaki Stream crosses the site, and has a low to medium flood hazard, based on the WDC maps.*
 - *Post development, there is some displacement occurring onto the Rangiora-Woodend Road, but considered to be within design standards.*
522. For the applicant, Mr McGillan⁸² describes the flooding scenarios as:
- *Within the Rangiora-Woodend Road, there is a flood depth increase of approximately 60mm at the road centreline and up to 100mm at the road edge*
 - *Within properties to the north-west, there is a flood depth increase varying between 5mm and 230mm*
 - *Within properties to the North and North-east, there is a flood depth increase varying between 5mm and 410mm.*
523. Council's advice, from Mr Aramowicz, is in agreement with these flood depth increases, however, he notes that this increase in water depth occurs in swales and depressions on adjacent land, rather than dwellings. From a planning perspective, I consider that this increase

⁸¹ Paras 21-26, Ms Pandrea EIC.

⁸² Section 9.5, Mr McGillan, EIC

in flooding depth is not of substantial concern, and can be managed if the land were to be rezoned and subsequently developed.

524. Servicing can be provided either through Bellgrove North once it is provided to the western side of Golf Links Road, or to the same location via Kippenburger Avenue.
525. There are options available to limit access points to Rangiora-Woodend Road.
526. Overall, I consider that the technical and engineering issues with the site can be addressed.

Overall consideration

527. I consider that both general and medium density residential are available as future zones on this site for consideration.
528. The primary challenge with this proposal is the policy requirements. It is an unanticipated development, not in a development area, outside of the shaded areas in Map A, and not occurring as part of a wider ODP. I note the following concerns:
 - These landowners have not had an expectation of being rezoned in part or full by way of the development area overlay.
 - It could thus have negative effects on immediately adjacent neighbours who have not submitted on the PDP and are expecting a rural lifestyle level of amenity.
 - It is not in response to a change, or potential change in infrastructure which requires a decision to be made about future land use under either the CRPS or Objective 6 NPSUD. It is a development proposal.
 - It may not offer significant development capacity, being a comparatively small area of land in contrast to the bigger developments to the west.
 - It has transport connectivity issues, with no currently available alternatives to the Rangiora-Woodend arterial. Council transport advice is to limit access onto Rangiora-Woodend Road to one point only, and to provide alternative access onto Marchmont Road.
 - I do not consider it provides significant development capacity, certainly not when compared to other developments further west.
 - It would push the town boundary east of what I consider to be a logical boundary on Golf Links Road, and the Cam/Ruataniwha River to the south, forming a pocket of non-contiguous development bounded by roads and rural land to the north and east. It is isolated from the rest of Rangiora.
 - There are no natural boundaries to the north or east of this site, potentially all the way to Woodend to the east, or the Ashley River to the north. I consider boundaries to be a component of a well-functioning urban environment.
529. I do note that the pocket of the Kelley property to the south (479 Golf Links Road, and considered below in relation to Bellgrove South) may also appear to be in this situation, but I consider this to be a separate and unique situation that this is an artifact of the development area boundary, and the cadastral boundaries in relation to the Cam/Ruataniwha. Unlike 479 Golf Links Road, there is no development area overlay on the Hobson and Whimp property, and

thus no anticipation of residential development. There is also no contiguity and connection to a wider development, unlike the properties on the south side of the Rangiora-Woodend Road.

530. I note the effects on surrounding landowners, particularly:
- 16 Rangiora Woodend Road, which would become surrounded by residential development on two sides, with a road to the east, and the only remaining rural-lifestyle amenity occurring in the viewshaft to the north.
 - 6 Marchmont Road, which loses its southern aspect to residential.
 - 22 Marchmont Road, losing some of its eastern aspect.
 - 44 Marchmont Road, losing some of its southern aspect
 - 476 Rangiora-Woodend Road, losing its western aspect.
531. The submitters have not provided evidence of the effects of this development on the surrounding landowners.
532. I also note the potential difficulty in access to the site, particularly off Rangiora-Woodend Road, which is an arterial route with a speed limit of 70 km/hr in this location.
533. Land outside of the new development areas must be considered under the NPSUD, particularly Policy 8 as there is no policy pathway without applying the responsive planning provisions. However, as I do not consider that Policy 8 NPSUD applies as I do not consider proposal does not provide significant development capacity in the context of the surrounding larger and anticipated developments that do provide this capacity. I do consider that Policy 8 should be interpreted in light of Objective 6 NPSUD, which does not limit itself to significant development proposals only. I must be responsive to all development proposals under Objective 6, not just those that provide significant development capacity.
534. Policy interpretation approach 2 then leads back to the CRPS, particularly 6.3.11(5), as testing a well-functioning urban environment in turn requires a consideration of what the CRPS considers a well-functioning urban environment to be
535. I consider CRPS 6.3.11(5) to be a useful summary of what the requirements are for amendments to the location of land for development. These are:
- Infrastructure is either in place or able to be economically and efficiently provided to support the urban activity
 - Provision is in place or can be made for safe, convenient, and sustainable access to community, social, and commercial facilities.
 - The objective of urban consolidation continues to be achieved
 - Urban land use, including industrial and commercial activities, does not increase the risk of contamination of drinking water sources, including the groundwater recharge zone for Christchurch's drinking water
 - Urban development does not lie between the primary and secondary stop banks south of the Waimakariri River which are designed to retain floodwaters in the event of flood breakout

- The landscape character of the Port Hills is protected
- Sufficient rural land is retained to maintain the open space landscape character either between or surrounding the areas of urban activity within Greater Christchurch
- The operational capacity of strategic infrastructure is not compromised.

536. Against the tests above, I consider the following:

- infrastructure is in place or able to be economically provided to the development, as part of proposals further west.
- Access to community, social and commercial facilities is a challenge, as the development is isolated from other developments, except by way of existing busy roads.
- It does not achieve urban consolidation as there are existing large areas awaiting development further west, and which have ODP designed connections through them to other areas, without relying solely on an existing arterial route. It is not being developed as part of a wider ODP, nor is it immediately adjacent to an existing ODP.
- It does not meet the requirement to maintain the open space landscape character either between or surrounding the areas of urban activity within Greater Christchurch, by extending Rangiora east into the open space between it and Ravenswood/Woodend.
- It may affect the operational capacity of the strategic Rangiora-Woodend road.

537. Further to this, I note the requirements in Policy 6.3.1 to give effect to the urban form as identified in Map A, CRPS, and “give effect” can be considered in light of a “well-functioning urban environment”, without the overall directive and prohibitive provisions of Objective 6.2.1. The site is not connected to the rest of the Rangiora urban environment, except by one strategic road, and as such, I consider that Map A, CRPS is correct in identifying the eastern boundary of Rangiora as the western side of Golf Links Road, and not extending beyond.

538. I have not identified any other CRPS objectives and policies that are of particular relevance to this rezoning application.

539. I thus recommend declining this submission to rezone. The land would remain as rural, with the overall PDP recommendations to rezone it as rural lifestyle (RLZ).

540. I note that the planner for the submitter, Mr Bryan McGillan contacted myself on 18 March 2024 regarding meeting with WDC and the 4 Golf Links Road application, and engineering staff on 4 June 2024. I advised him that Council’s technical staff were always available to meet, but that meeting with myself as reporting officer ahead of the s42A report being issued was unlikely to be of benefit as I could not provide my final recommendations ahead of the s42A report publication. I did state that I considered that the policy environment was unfavourable to the rezoning request.

6.4.3 Recommendations

541. That the following outcome for submissions occurs

- Rachel Hobson and Bernard Whimp [179.1,179.2] is **rejected**
- Further submission FS Rachel Hobson and Bernard Whimp [FS 80] is **rejected**

- Further submissions FS Marcus Obele [FS 39] are **accepted**

6.4.4 Plan-enabled capacity arising from this recommendation

542. I consider there is no plan-enabled capacity arising from this recommendation.

543. However, if it were to be approved, I consider that it would result in about 11 ha of additional capacity. Setting aside perhaps 30% for reserves, as per the submitter's ODP, this would result in 110 additional dwellings at 700m² lot sizes, 385 at 200m² MDRS lot sizes, and 248 as an average.

6.4.5 Amendments

544. I recommend no amendments to the PDP arising from this section

7 South East Rangiora rezonings

7.1.1 Description

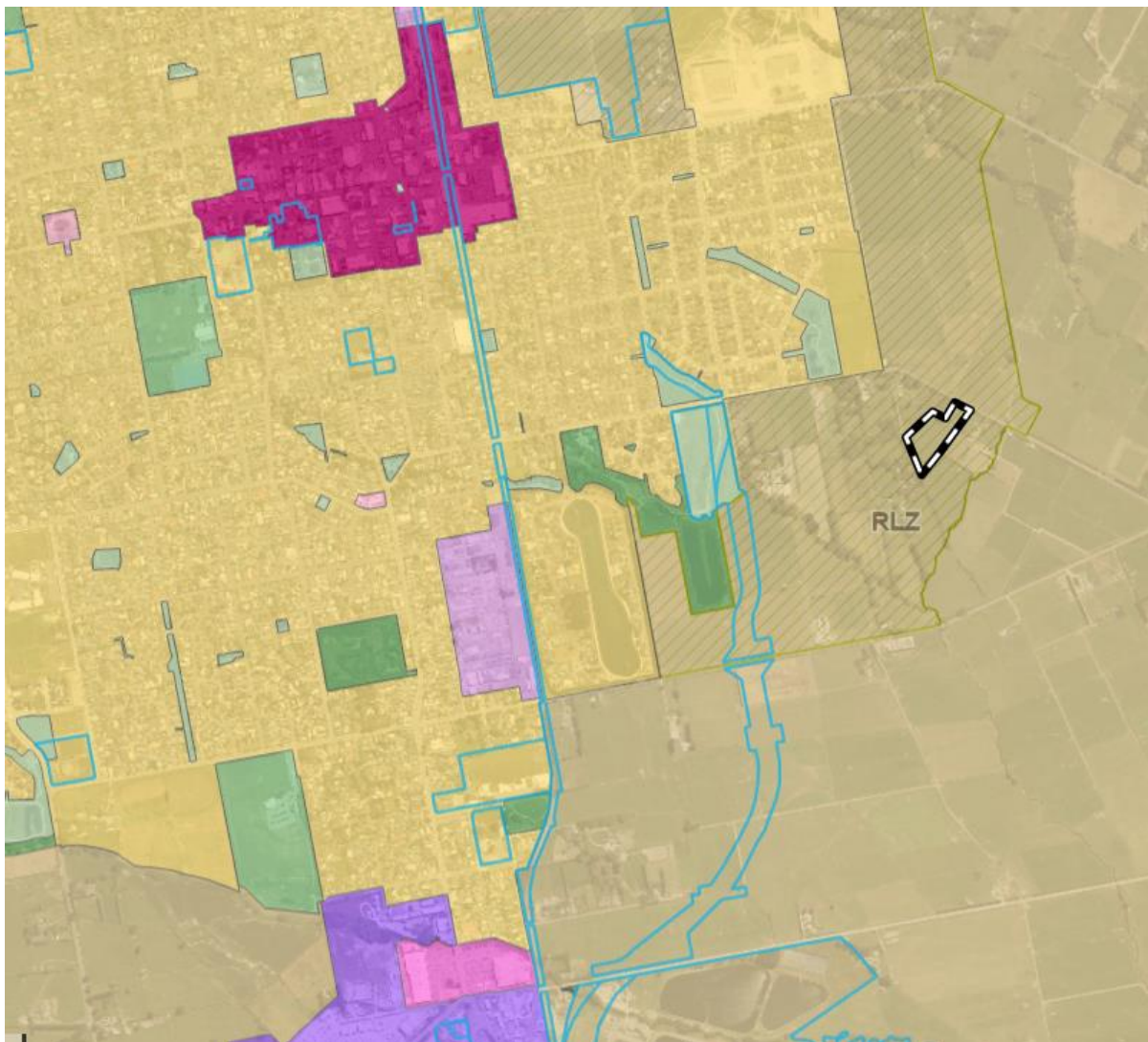


Figure 36 South East Rangiora area

This is the green shaded area to the east of Rangiora



Figure 37 South East Rangiora ODP

545. The rezonings in the area are primarily contained within the South-East Rangiora Development Area. I address the specifics of the land status in the context of each rezoning request, as there are some complexities at the boundaries.

Cultural advice

546. The cultural advice is as set out above, requiring the achievement of the following in respect of this block (area 1 in the MKT report):

- *Waterways should be protected and enhanced with suitable setbacks and riparian buffers planted with indigenous species (see policy WM12.5).*
- *There should be a survey undertaken to identify springs and/or wetlands on the site. This should be undertaken by a suitably qualified expert. Springs and wetlands should be protected and enhanced with suitable setbacks and indigenous riparian planting.*
- *Areas identified as culturally sensitive should be protected and enhanced. Consultation with the Papatipu Rūnanga may be required to determine culturally appropriate methods of enhancement.*
- *Low impact design methods, such as, the use of rain and greywater collection and re-use systems, and minimising impervious surface area is encouraged. Refer to Ngāi Tahu*

Subdivision and Development Guidelines (Appendix 1) for low impact design methods endorsed by mana whenua.

- *Contaminated sites should be remediated. All contaminated material should be removed from the site and disposed of at a licensed facility.*
- *Measures to minimise earthworks should be considered at the design phase of development.*
- *Earthworks in areas with shallow depth to groundwater and/or over an aquifer can have significant cultural impacts and are of concern.*
- *The site should be surveyed by a suitably qualified person(s) to determine whether there are taonga species within the site that need to be protected.*
- *Refer to Ngāi Tahu Subdivision and Development Guidelines (Appendix 1) for guidance on stormwater, water supply and wastewater servicing.*
- *Note: The list of recommendations is preliminary, general/non-specific and non-exhaustive and is provided as preliminary guidance only.*

547. I note the following sites of significance to Māori (SASM) and other heritage listed items in the area:

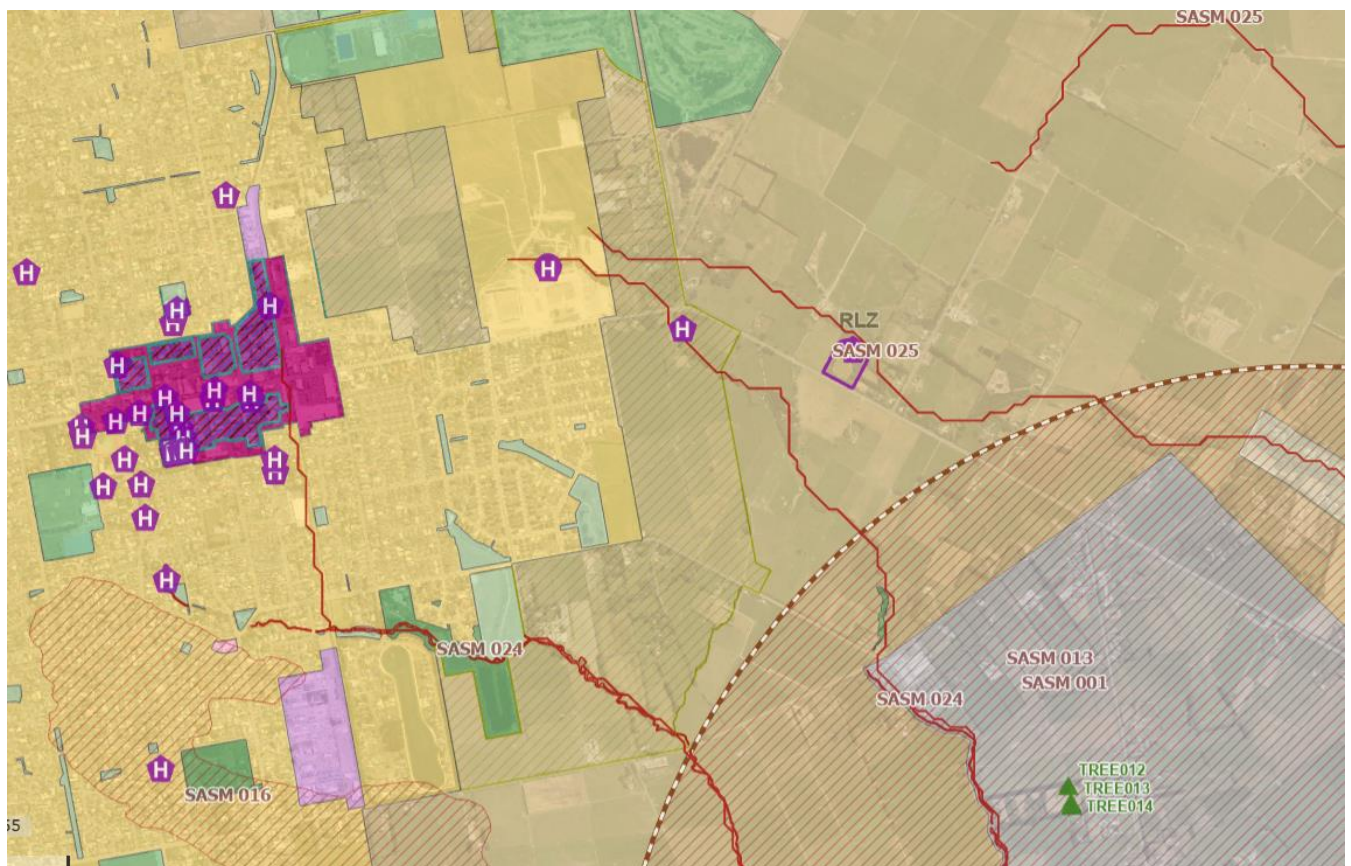


Figure 38 Cultural and heritage aspects of the SER

548. There are two SASMs 024 and 016 associated with the Cam/Ruataniwha River (024) and its tributaries, and SASM 016, the former extent of a native forest. Ngā Wai SASMs identify “River

and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species”, and Ngā Tūranga Tūpuna⁸³ which represents Ngahere a Rangiora, or the former podocarp forest extent which centred on present day Rangiora.

549. There is one significant heritage site – HH012 – which is a homestead.
550. The South East Rangiora development area in total is about 108 ha, and is currently is split primarily across two developers – Bellgrove South in the northern part (31.2ha, inclusive of the additional parcel they seek), plus three other parcels that are outside of the development area, making for 34.2 ha, and Richard and Geoff Sparks in the south (48.8 ha in total).
551. There is a submission to add further land in the north eastern part of the area, an additional parcel for Bellgrove North (3.3 ha) and also to rezone all of the Kelley property. The Bellgrove South development does not cover all of the land in the northern part of this area, with the development area overlay covering part of the remaining property at 52 Northbrook Road⁸⁴.
552. Survus Consultants Limited [250.6] seek the South East Rangiora Development Area to be rezoned for urban development in order to achieve sustainable growth and development of the District, meet the requirements of the NPSUD 2020, and achieve the purpose of the RMA by rezoning South East Rangiora Development Area for urban development (General Residential Zone, or other appropriate zoning). This is supported in a further submission by Bellgrove Rangiora Ltd [FS 85].
553. There is an additional area in the south east of about 25.8 ha, which currently has no primary developer, but which is still within the development area and ODP, and subject to a general submission by Survus [250.6] seeking rezoning of the entire area, as well as part of the CSI Property Limited submission above (for 52/65 Northbrook Road).
554. CSI Property Limited [212.1] oppose rural lifestyle zoning for the following properties in the area and seek residential zoning for them:

Boys Road

- 149, 243, and 287 Boys Road
- 149 Boys Road, 243 Boys Road, and 287 Boys Road are not within SER DEV area. 287 Boys Road, owned by Keith Dale Hewinson.

Marsh Road

- 4, 137, 150 and 228 Marsh Road.
- 4 Marsh Road (owned by Peter Robin Amer), 137 Marsh Road (owned by Michael David Pearson), 150 Marsh Road (owned by Karen Linda Gurney) and 228 Marsh Road (owned by David Paul Ford, Rachel Ann Ford) are not within the DEV area.

Dunlops Road

- 2 24, 28, 32 and 34 Dunlops Road,

⁸³ <https://waimakariri.isoplan.co.nz/draft/rules/0/240/0/0/0/224>

⁸⁴ 65 Northbrook Road includes 52 Northbrook Road, as the Council address links properties by the ratings address

- 2 Dunlops Road (owned by Neale Leon Winter, Sharon Margaret Winter), 10 Dunlops Road (owned by Carlanna Trustees Limited), 24 Dunlops Road (owned by Pauline Maree Riddell, Robin William Riddell), 28 Dunlops Road (owned by Jenny-Lee Parata), 32 Dunlops Road (owned by Tracy Celina Ford) and 34 Dunlops Road (owned by Tracy Celina Ford) are not within the DEV area.

Gefkins Road

- 17 and 21 Gefkins Road,
- 17 Gefkins Road (owned by CKLaw Trustees Limited, Linda Mary James) and 21 Gefkins Road (owned by Carlanna Trustees Limited) are not within the DEV area.

Camside Road

- 109 Camside Road
- 109 Camside Road (owned by Jill Valerie Amer, Raymond George Amer) is not within the DEV area

Northbrook Road

- Part of 65 Northbrook Road
- 65 Northbrook Road is in the DEV area in part, address also applies to 52 Northbrook Road, on the other side of the road, also owned by Beaufort Trustee Limited, also in the DEV area in part).

555. This is supported in part by Richard and Geoff Spark [FS 37] and Transpower [FS 92] are neutral.

556. I will assess the parts of the CSI Investment submission that fall within the development area below, and the other parts in section 8.6 below.

7.2 Bellgrove South proposal

7.2.1 Matters raised by submitters

557. The Bellgrove South area is:

- Currently zoned as rural in the operative district plan;
- Proposed in the PDP as RLZ;
- Inside of the projected infrastructure boundary, as set out in Map A of the CRPS, apart from an additional 3.3ha parcel that is outside of it, and any boundary adjustments in respect of the Cam/Ruataniwha that may be inside or outside of it;
- Inside the south-east Rangiora new development area, which is an FDA as set out within Map A of the CRPS, apart from an additional 3.3ha parcel that is outside of it, and any boundary adjustments in respect of the Cam/Ruataniwha; and
- Has an ODP for the site within the operative or Proposed Plan.

558. Bellgrove Rangiora Limited [413.2] seek to rezone Bellgrove South. This is supported in a further submission by themselves [FS 85].

559. Gregory E Kelley [391.1] raises the following concerns regarding the future potential development of the South East Rangiora Development area, in the context of his own land, which is outside of this area:

- The scale and infrastructure will endanger the Cam River. His family remember the Cam River only drying up once in the past however since purchase of property at 479 Rangiora Woodend Road nine years ago it has dried up four times. Attributes this to drainage, stormwater channels and dry wells in the Northbrook/Goodwin Street area. This endangers native and endemic fauna. The area to the south of the property are partial wetlands and springs with additional native species (crayfish) that do not want to see threatened.
- The development area runs close to [his] property's western boundary and well. Health and safety concerns about water supply becoming contaminated by storm, waste water or pollution from roading and walkways or flood events. The Proposed Plan notes there are artesian springs in the area which property is connected to at a minimum through the well and aquifer.
- Concerned that plans for infrastructure, particularly setbacks from water sources, are not well defined and insufficient. Seek consideration and assurance of the protection of the Cam River and local fauna, and protection of water supply.
- He requests to rezone his property at 479 Rangiora Woodend Road to Residential/General Residential Zone. 8500m² of the property is available for subdivision outside of the South East Rangiora Development Area (SER) and is currently zoned Rural Lifestyle Zone.
- He states that the SER abuts the property's western boundaries and will degrade future potential property value.
- He considers that the Proposed Plan has little or no mention of compensation or remediation and on-going responsibility for negative impacts on surrounding properties caused by the development. Enabling subdivision of the property by rezoning to residential could provide means of recourse should remediation be required to keep property viable, and would be disadvantaged without this option. This could also give options to protect the Cam River and water security.

560. Mr Kelley is supported with a further submission from Rachel Hobson and Bernard Whimp [FS 90].

7.2.2 Description

561. The Bellgrove South development takes up the northern half of the south-east Rangiora Development area, comprising 27 ha of land. Bellgrove Rangiora Ltd also request an additional 3.3 ha of land to the east of the development area, as they consider that this would otherwise result in a non-complying balance parcel and a poor urban form.

562. There are additional blocks of land that are not within the Bellgrove South proposal, which I discuss below.

7.2.3 Assessment

Natural hazards, geotechnical

563. Mr Aramowicz's summary advice is:

- *The site contains soft ground and peat. Subdivision design and construction will need to be undertaken in a way that minimises the risk of subsidence to future roads, underground services and building foundations.*
- *Fraser Thomas (FT) has carried out flood modelling for a possible development of the site. The submitter's ODP identifies SWMA's and wetlands which appear to be in logical locations although no evidence has been provided to demonstrate the sizing of the SWMA's is appropriate. The FT report indicates effects in a 200yr event will result in increased flood depth of less than 60mm to paddocks, not more than 20mm to existing houses.*

3 waters

564. Mr Aramowicz's summary advice is:

- *There are no significant wastewater constraints that would prevent the proposed land use.*
- *In summary, there are no water supply constraints that would prevent the proposed land use.*
- *Based on existing flood hazard modelling, I expect that with careful engineering, the effect of any additional stormwater runoff from a future subdivision to the Silverstream/Kaiapoi area can be largely mitigated using onsite and/or offsite attenuation.*

Transport

565. Mr Binder's advice is:

- *The ODP is missing an extension of the existing connection off Goodwin St (between #24 & 26)*
- *I would recommend against the proposed 4-way intersection at Devlin & Cassino or as shown with the internal secondary roads. 4-way crossroads are not recommended due to the higher number of conflicts between turning vehicles.*
- *I strongly encourage that placement of higher-density MRZ take into consideration the need and benefit of close proximity to public transport and regional cycling links. In this instance, Kippenberger Ave will likely have the only PT service and Grade 1 (highest level) cycleway in the ODP area. Higher density development in close proximity to PT and cycle facilities both increases the number of households that can realistically take advantage of these modes as well as creating higher demand for them.*
- *I acknowledge that the existing structure plan shows a primary road corridor extending south from Devlin Ave to Boys Rd, crossing Northbrook Rd at its present 30-degree bend. The likely resulting intersection geometry and compromised sight-lines are such that I strongly recommend that a roundabout be constructed at this location.*
- *I note that the proposed ODP does not provide any connectivity to the east (e.g., #479 & 521 Rangiora-Woodend Rd) as is indicated in the existing structure plan. Portions of these two sections in particular are within the infrastructure boundary so while I cannot speak to the future development intent east of the applicant's land, if development could occur to the east, future roading connections from the ODP would be critical.*

Greenspace

566. Mr Read's advice is:

- *The proposed green linkages, cycleway and esplanade reserve provision in this proposed residential development area are advocated and supported by Council Greenspace. The indicative Open Space Reserve is appropriately located for wider community access. Ultimately, the size of this open space reserve (neighbourhood park) will need to comply with Council's Park Levels of Service guidelines. These state that most residents are to be within 500m, or a 10-minute walk, of a neighbourhood park; and 1.0ha of neighbourhood park space is to be provided per 1,000 residents (approx. 420 dwellings) The accessibility distance is fully achieved across the ODP area, but the size of the park space is to be determined.*

567. There appear to be no specific technical issues with rezoning the land, noting that whilst the constraint on peat soils applies to the whole development area, it is more likely to apply to the southern part of the area, south of Northbrook Road. This will be discussed in relation to the Sparks and other proposals below. Soft ground and peat soils is usually managed through the subdivision consent process that applies the relevant engineering standards.

Cultural advice

568. MKL have provided advice on the cultural aspects of the proposal. The Cam/Ruataniwha is significant to Runanga, as well as being a significant feature of the district overall I consider the following:

- The RMA esplanade provisions provide for 20m esplanade reserves, however esplanade reserves only occur upon subdivision. The NATC setback provisions apply to structures regardless of underlying land use, but these only require a 10m setback on structures in residential areas (20m in rural).
- In the context of the cultural advice I do not consider that the plan provisions alone provide sufficient protection for the Cam/Ruataniwha, and at least a 20m buffer should be provided, by a variety of mechanisms preferably enabling up to 40m of protection on both sides of the Cam/Ruataniwha.
- There are a variety of mechanisms to achieve this, given the complexity of the boundaries in the area, and also to be fair and consistent with the individual landholders.
- Further springs may be found in the area, and if these are found, they are to be treated according to the 5m setbacks in NATC-SCHED4⁸⁵. Any spring that was also a wetland would need to be consistent with the NESF regulations, which require bigger setbacks for urban development, and a restricted discretionary consenting category. Ecological advice from the applicant has not identified any wetlands to date.

Applicant expert evidence

<u>Person/Organisation</u>	<u>Evidence type</u>
Mr Jason Trist	Infrastructure
Mr Jan Kupec	Geotechnical
Ms Wendy Whitley	Contaminated Land

⁸⁵ As per my recommendations in Stream 4 to call this NATC-SCHED4

Ms Michelle Ruske-Anderson	Planning
Mr Tony Milne	Landscape
Mr David Delagarza	Flooding
Mr Mathew Collins	Transport
Mr Geoffrey Dunham	Soils
Mr Fraser Colegrave	Economics
Ms Morgan Tracy-Mines	Ecology

569. I consider there is scope for considering either general residential or medium density residential across the whole development area, including the properties that have not submitted on the PDP. There is no opposition to rezonings from submissions. I also note that within the development area that development has been anticipated, due to the overlay.

570. The eastern boundary has a number of considerations, which discuss below:

Boundaries

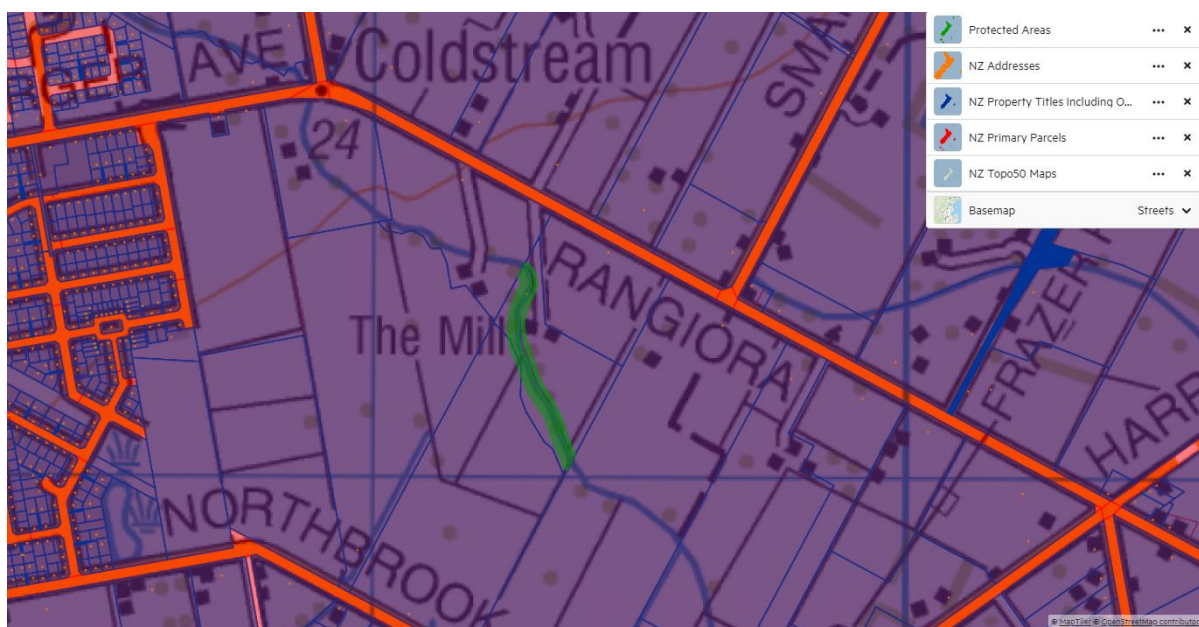


Figure 39 Boundaries in respect of Cam/Ruataniwha River

571. The Cam/Ruataniwha River sits on the Leech block, Kelley block, and other land to the south. The Map A, development area, and ODP boundaries do not follow the Cam/Ruataniwha and nor do the existing property boundaries.

572. The boundary of the development area from north to south, as defined by Map A, CRPS are:

- From Golf Links Road as described in the section above, the boundary follows the Rangiora-Woodend Road to the Kelley land, partitioning off about 9.1 ha of this land (1ha of Kelley land, about 8 ha of Leech land), before following a fence line that bisects the Bellgrove South land.
- It then bisects a parcel of land at 52 Northbrook Road (owned by Beaufort Trustee Limited), roughly 1/3s, 2/3s, arriving at Northbrook Road.

573. As partially stated above, not all of the area is covered by the Bellgrove South proposal, with the following blocks outside of Bellgrove:
- The Thompson block, at 23 Kippenburger Avenue, owned by Carol and Steven Thompson. They did not submit on the PDP, but are within the ODP. This is 0.1 ha.
 - The Leech block, at 521 Rangiora-Woodend Road, owned by Richard and Sharon Leech. They did not submit on the PDP, but are within the ODP. The Leech homestead is a historic feature, listed within the PDP. This block is about 4.7 ha.
 - The Kelley block, at 479 Rangiora-Woodend Road, owned by Gregory and Emma Kelley. They are largely outside of the development area, but the parts of their property that are within the development area are within the ODP. They did submit on the PDP, requesting rezoning of all of their land to residential. 1 ha of this block is within the development area as set out in Map A.
 - The Beaufort Trustee Block, at 52 Northbrook Road, who did not submit, however, this land is subject to submissions from CSI Property and Survus requesting that it is rezoned. The ODP recommends a stormwater management area on this land. This is about 4.3 ha.
574. The ODP submitted by Bellgrove South, whilst at a high level, shows a blue-green corridor and reserves that extend along the Cam/Ruataniwha as a boundary, however, this is outside of the Bellgrove Rangiora land and would not be possible without rezoning additional land.
575. As such, the positive effects of enhancing the Cam River/Ruataniwha (in para 148 of Ms Ruske-Anderson's EIC) would not be possible, as the Cam River is not within scope of their land. However I understand Bellgrove's intent, and they have since clarified that the buffer strip they are recommending is from their property boundaries, and not the Cam/Ruataniwha.
576. The following map shows the Bellgrove changes⁸⁶ in respect of this boundary, which I consider to be minor:

⁸⁶ Received via email from Ms Ruske-Anderson on Thursday 20 June 2024

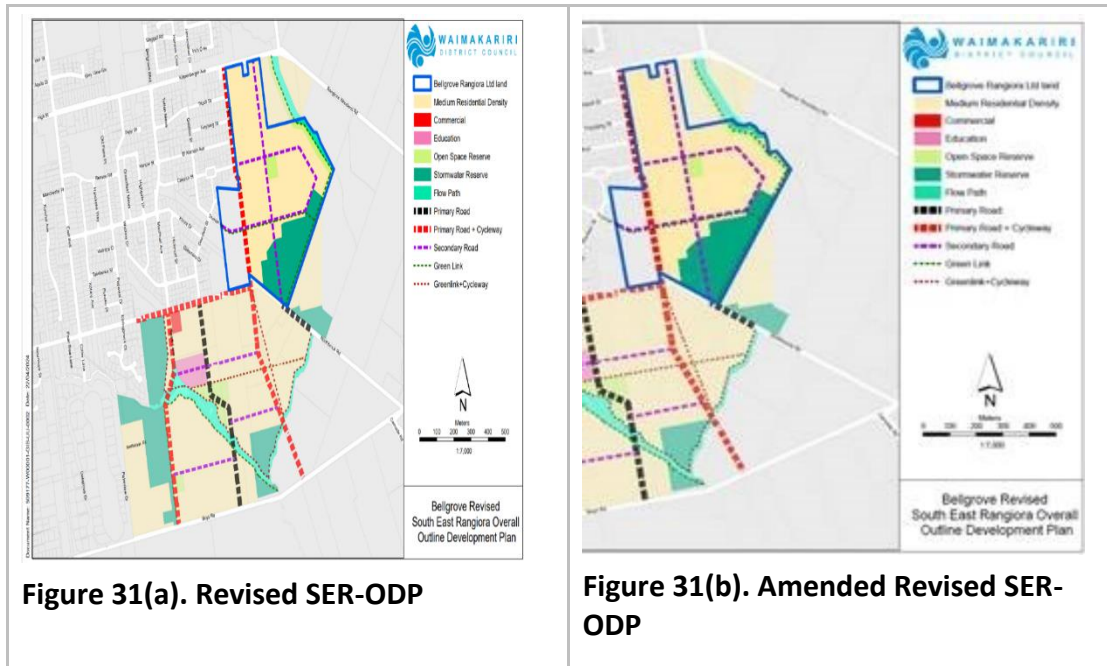


Figure 40 Bellgrove boundary changes

577. I consider that the current boundary from Map A is not logical, and in the case of Bellgrove South, as Ms Ruske-Anderson states would result in an orphaned and non-complying balance parcel of 3.3 ha between the Cam/Ruataniwha and the current Map A FDA area boundary which I consider would not produce a good urban form.
578. Even rezoning the additional parcel would still not achieve a boundary with the Cam/Ruataniwha, as this parcel does not include the river. Obtaining the Cam as a boundary requires the rezoning of additional, non-Bellgrove land, and land outside of the shaded areas in Map A, CRPS, or other considerations.
579. I consider that the logical boundary of any future urban area in the east would be to follow the western bank of the Cam/Ruataniwha River between Kippenburger Avenue-Rangiora Woodend Road, to Northbrook Road. However, this is a much wider area of land than anticipated in the notified PDP and submissions on it, as the development area overlay does not extend that far to the south east.
580. I also note the pocket of development area on the Kelley and Leech land that extends eastwards of the Cam, meaning that the Cam/Ruataniwha could not be an absolute boundary, except by removing this development area, and I do not have scope to remove the development area from these landowners, as this would remain in Map A of the CRPS regardless of any recommendations I might make.
581. If the Cam/Ruataniwha was to form a boundary for the bulk of the eastern part of the Bellgrove South development, then it would require the Leech and Kelley properties to be rezoned in part or full. The Leech property is entirely within the development area overlay, bisected by the Cam, and bounded on the north by Rangiora-Woodend Road. It is logical to consider rezoning this.
582. The Kelley property is primarily not within the development area overlay, however, there is a small eastern part of it (about 1 ha) and a very small pocket on the western side of the Cam which is within the overlay. It is bisected by the Cam. The primary dwelling is on the western side of the area, *but outside of the development area* overlay, and would be immediately

adjacent to the Bellgrove South development if the additional Bellgrove 3.3ha parcel was approved for rezoning in the absence of a buffer. However as I understand from Bellgrove's changes as shown above in Figure 31, a buffer is now proposed.

583. I am also conscious of the submission from Gregory Kelley, who has requested rezoning of his whole property from rural to residential, including the parts that are outside of the development area, but at the same time has expressed concerns about boundary issues, and the effect of any residential development on the Cam/Ruataniwha River:

- If the additional Bellgrove South land is rezoned, the Kelley property boundary would form the boundary, and reverse sensitivity and boundary issues would arise with the immediate proximity of the current dwelling to the development in the absence of a buffer.
- If the Kelley property is also rezoned, the opportunity is created for a logical and cohesive boundary along the Cam River, at least as far as the extent of the Kelley property. The same reverse sensitivity and boundary issues would arise with the current dwelling. Mr Kelley raises concerns about the effect of residential development on his water supply bore, which is to the west of the Cam, and which could be affected by residential development, although I note the potential to receive town water in the future if development comes close to his dwelling.
- If all of the part of the Kelley property east of the Cam is rezoned as requested, I consider this may fail to provide a cohesive and logical eastern boundary to Rangiora, with the following urban form issues:
 - Substantially out-of-sequence development, prior to the south-eastern development area occurring.
 - A lack of a consolidated urban form, and loss of open space character between Rangiora and Woodend.
 - A potential proliferation of accessways onto the strategic and arterial Rangiora-Woodend Road, creating safety and traffic flow issues.

584. There may be mitigations to these issues which I discuss below.

The Kelley land and Bellgrove boundary

585. I have discussed the boundary issue with both Mr Kelley⁸⁷ and representatives of Bellgrove. From my discussions to date, Mr Kelley is supportive of at least a 20m buffer between his property and Bellgrove, but the exact width and design of that buffer may need further discussions. His current dwelling and the part of his property west of the Cam would form part of the buffer.

586. I consider that Mr Kelley has unique challenges with the rest of his property that result from the interplay between the parcel boundaries, the location of the Cam, and the development area from Map A. At present, this interplay substantially constrains the options Mr Kelley, or any future landowner, has, in respect of this block, in my view both preventing an effective urban boundary and environmental protection of the Cam being achieved, and limiting the options for effective future development of the property in the event that reverse sensitivity makes the

⁸⁷ Monday 24 June for representatives of Bellgrove, and Tuesday 02 July for Mr Kelley

current dwelling unsuitable for living. These challenges are unrelated to his desires and intentions for the property, and would exist for any landowner without change.

587. I also note the cultural advice in respect of the Cam/Ruataniwha that I have addressed in part above.

588. Mr Kelley's submission provides an opportunity and scope to address this issue. After discussions with Mr Kelley, I have considered the following:

- That the western portion of the Kelley property is probably unsuitable for residential development. However, I consider that the current land use as a large single dwelling would be unlikely to change in the short to medium term. It is suited to form part of a wider future buffer on the Ruataniwha, as requested by MKL, and which is already being provided for in part by the ODP recommendations of Bellgrove North in respect of their boundary.
- Residential development is possible on the 1ha of development area overlay, but probably not viable by itself in the absence of it occurring in the context of a wider development, due to it being both small, and having challenging transport access. A wider development in this location is theoretically possible if Bellgrove South extends to the east, however this would require bridging the Cam/Ruataniwha, and also potentially the Leech block to be developed first. Thus, I do not consider linking or otherwise making development on the Kelley land contingent on staging decisions further east to be fair or reasonable as the only option. It is one of a number of options.
- Another option is to extend of the development area to a point which addresses the transport issue. This would result in the potential access point for the development being situated at the site of Mr Kelley's current driveway, which may be far enough away⁸⁸ from the corner to provide the relevant sightlines for access. This would be a 1ha addition to the development area, making for 2ha of potential residential land on Mr Kelley's property.
- Any such proposal, along with any development on the Leech block, may require screening from the road in order to address the artifact of the development area coming east of the Cam, whilst still obtaining an urban boundary.

589. I have confirmed this option with Mr Binder who supports it, and Mr Jolly has helpfully produced updated and amended boundaries on an ODP.

Overall consideration

590. I have not been able to consider Mr Kelley's concerns about the Cam/Ruataniwha drying up as a result of urban development in the area. I may be able to present supplementary information on it at the hearing, but at this point, I have no substantive information before me on this issue that I consider is determinative on rezoning recommendations.

591. Under policy interpretation pathway 2 I can consider the land under the NPSUD. I consider that it provides significant development capacity, and could contribute to a well-functioning urban environment, if amendments to the boundaries ODP level design are made. Without those

⁸⁸ I have measured it as 300 metres away from the corner to the west.

amendments, if just the land in the development area was approved for rezoning, I consider it would have a poor urban form, and fail the well-functioning environment test.

592. The CRPS applies in the responsive planning provisions context. The primary test for rezoning within the new development area or future development area is CRPS Policy 6.3.12, with its specific tests that apply to the use of land within future development areas.

- The area is of low flood hazard.
- Provided that development occurs according to the recommended ODPs, it would achieve a consolidated and integrated urban form.
- Infrastructure can be efficiently and economically provided to it.
- The block of land has a primary developer, who is proposing to undertake the development after they have completed Bellgrove North⁸⁹.
- The remaining land is available for inclusion within Bellgrove or separate development, according to the overall ODP.
- I note that the capacity tests in 6.3.12(1) are to provide for medium term demand only. However, in the context of an NPSUD, at least sufficient test, I do not consider that I am limited to providing for medium term demand only, and can consider long-term demand. I note that I do not consider there to be a short to medium term shortfall in supply in the district.

593. I consider that the land within the development area can be rezoned, if there is scope from submissions.

594. Land outside of the development areas must be considered under the NPSUD, particularly Policy 8 as there is no pathway without applying the responsive planning provisions. Policy interpretation approach 2 then leads back to the CRPS, particularly 6.3.11(5), as testing a well-functioning urban environment in turn requires a consideration of how the CRPS already anticipates a well-functioning urban environment. I consider 6.3.11(5) to be a useful summary but non-exhaustive summary of the requirements in going beyond the shaded areas in Map A, as follows:

- Infrastructure is either in place or able to be economically and efficiently provided to support the urban activity
- Provision is in place or can be made for safe, convenient, and sustainable access to community, social, and commercial facilities.
- The objective of urban consolidation continues to be achieved
- Urban land use, including industrial and commercial activities, does not increase the risk of contamination of drinking water sources, including the groundwater recharge zone for Christchurch's drinking water

⁸⁹ My understanding as of July 2024.

- Urban development does not lie between the primary and secondary stop banks south of the Waimakariri River which are designed to retain floodwaters in the event of flood breakout
 - The landscape character of the Port Hills is protected
 - Sufficient rural land is retained to maintain the open space landscape character either between or surrounding the areas of urban activity within Greater Christchurch
 - The operational capacity of strategic infrastructure is not compromised.
595. Further to this, I note the requirements in Policy 6.3.1 to give effect to the urban form as identified in Map A, CRPS, and “give effect” can be considered in light of a “well-functioning urban environment”, without the overall directive and prohibitive provisions of Objective 6.2.1. The proposed boundary adjustments do not significantly alter the urban form as set out in Map A, except to move the development area boundary slightly to the east to enable safer access to the site.
596. I also note the requirements in Policy 6.3.3 to show principal roads in ODPs. The notified ODP does not show principal roads extending onto the Kelley or Leech blocks, however, Mr Jolly’s design changes add this.
597. I have not identified any other CRPS objectives and policies that are of particular relevance to this rezoning application.
598. Against the tests above, I consider the following for the additional Bellgrove land:
- infrastructure is in place or able to be economically provided to the development, as part of proposals further west.
 - Access to community, social and commercial facilities is the same as for the wider development, as it is integrated within it.
 - It achieves and enhances urban consolidation by being part of the overall ODP, and otherwise avoiding an orphaned parcel of land that the evidence of Mr Dunham states would be uneconomic.
 - It does not affect the requirement to maintain the open space landscape character either between or surrounding the areas of urban activity within Greater Christchurch, primarily as the parcel of land is sandwiched between an existing relatively arbitrary boundary, and the more natural boundary of the Cam/Ruataniwha.
 - It does not affect the operational capacity of the strategic Rangiora-Woodend road.
599. Against the tests above, I consider the following for the Kelley land:
- It is a relatively small area of land, approximately 1ha within Map A, with an additional recommended 1ha, making for a total 2ha on the basis of my recommended adjustments above. I consider this primarily as a boundary adjustment that reflects what I consider are unique challenges on the site and achieves a well-functioning urban environment for the Bellgrove South development as a whole.

- infrastructure is in place or able to be economically provided to the development, as part of the Bellgrove South proposal, or independently as part of any development on the west side of Golf Links Road.
- Access to community, social and commercial facilities is the same as for the wider development, as it is either integrated within it, or accessed via the existing arterial road,
- It achieves and enhances urban consolidation by avoiding undevelopable land,
- It does not materially affect the requirement to maintain the open space landscape character either between or surrounding the areas of urban activity within Greater Christchurch, as in this location, the development area boundary already extends east of the Cam/Ruataniwha. My recommendations above move the boundary slightly further east to ensure safe transport access.
- It does not affect the operational capacity of the strategic Rangiora-Woodend road if connections are eventually provided from the west via Bellgrove South, and if access limitations are placed on it,

600. I note that the above recommendations do not provide extra or additional development capacity that is significant on its own, in the meaning of Policy 8 NPSUD. It is only significant in the sense of being an ancillary proposal to achieving an appropriate urban boundary for the significant developments to the west. In the context of Policy 8 NPSUD, I do not consider that a well-functioning urban environment can be created in this location unless the boundary issue is addressed. I consider that these situations are best considered with the guidance from Objective 6 NPSUD that place a wider ambit on being “responsive” in general, and not just in relation to significant development proposals.

601. I assess the scope for rezoning from the submissions below:

Submitter	Number	Land Included in submission	Zoning sought (or relief description sought)
Survus Consultants Limited	250.6	All South East Rangiora Development Area	Seek the South East Rangiora Development Area to be rezoned for urban development
Bellgrove Rangiora Limited	413.2	Bellgrove South land	Seeks for Bellgrove South land to be rezoned as general or medium density residential
Gregory E Kelley	391.1	479 Rangiora-Woodend Road	Seeks rezoning to general or medium density residential

602. Both medium density residential and general residential are available as rezoning options. However I note the difference in height between the PDP general residential zone of two storeys, and the PDP medium density residential zone, of three storeys, which could be an issue on the western boundary of Bellgrove South, however, I note that this will be discussed in hearing stream 7.

603. I consider that there is a substantive difference between the 500m² allotment size of the general residential zone and the 200m² size for the PDP medium density residential zone, and that the required 15 households per ha yield in SUB-S3 would be unable to be achieved with 500m² minimum lot sizes. I thus recommend PDP medium density as the most preferable option.

604. I recommend the following:

- The entirety of the South-East Rangiora development area north of Northbrook Road is rezoned to PDP medium density residential.
- This includes the Thompson block, Leech block, the part of the Kelley block inside the development area with the additional land (about 2 ha), and part of the Beaufort Trustee block (4.2 ha).
- The remainder of the Kelley block retains the proposal to rezone it to RLZ, as with other currently zoned rural land.

605. That the following amendments to the ODP occur:

- Providing for at least a 20m buffer, consistent with cultural advice alongside the Cam / Ruataniwha, made up of the following:
 - At least a 20m open space strip between any urban development on Bellgrove South and their property boundary, irrespective of a relationship with the Cam.
 - An indication in the narrative text of the ODP and the maps for a future reserve, park, or esplanade reserve on the western portion of the Kelley land.
 - 40m setbacks on each side of the Cam/Ruataniwha through the Leech property.
- Transport connections through the Leech land to the Kelley block, including an additional Cam/Ruataniwha stream crossing.
- Access point to the Kelley land at the point of the existing driveway.
- Prohibitions on accessways between the existing Kelley driveway and the bend in Rangiora-Woodend Road, protecting the strategic and arterial road.
- Narrative text on drains and drain setbacks, as most will be waterways

606. I would recommend the following ODP amendments occur, as per Mr Jolly's recommendations:



Figure 41 Recommended updates to SER ODP

7.2.4 Recommendations

607. That the following outcome for submissions occurs:

- Further submission Richard and Geoff Spark [FS 37] is **rejected**
- Bellgrove Rangiora Limited [413.2], Survus Consultants Limited [250.6] are **accepted**.
- Further submissions FS Bellgrove Rangiora Ltd [FS 85], Rachel Hobson and Bernard Whimp [FS 90], Transpower [FS 92] are **accepted**
- Gregory E Kelley [391.1], CSI Property Limited [212.1] is **accepted in part**

7.2.5 Plan-enabled capacity arising from this recommendation

608. I consider the following plan enabled capacity arising from these recommendations:

- For the Bellgrove South proposal, as an anticipated urban environment, there is 27ha of land available for residential development.
- The Beaufort Trustee block of 4.7ha is included in the overall Bellgrove South ODP, however, it may service land outside of Bellgrove South, so I have not included it for the purposes of a capacity assessment.
- The rest of Bellgrove South, from what I can see, will have reserves of about 30%, as will the additional SER properties, making for about 19ha of land for housing.

- This results in a plan-enabled capacity of 315 at 600m², of 945 at a full MDRS scenario of 200m², and 630 as an average scenario.
- The additional land results in a plan-enabled capacity of 68 at 600m², 203 at a full MDRS scenario of 200m², and 135 as an average scenario.
- The unanticipated land, which is the 3.3ha additional Bellgrove South block, plus my recommendation for the additional 1ha on the Kelley property to address the access sightlines issue, is 4.3ha all up. Some of the additional Kelley land would be required for esplanade reserves in the event of a subdivision, and the Leech property is bisected by the Cam/Ruataniwha, and the proposed wider esplanade strips. Otherwise, the reserve requirements on this land are not high, as the reserves have primarily been set out elsewhere. I have assumed a 15% reserve for the additional Bellgrove land, made up of roads, and the 20m buffer as set out in Ms Ruske-Anderson's supplementary evidence, and a 20% reserve on the Kelley, Leech, and Thompson land.
- This results in a plan-enabled capacity overall of an additional 60 houses at 600m², 180 at a full MDRS scenario of 200m², and an average of 120.

7.2.6 Amendments

609. That the PDP is amended as set out above, and in Appendix A

7.3 Sparks Block A proposal

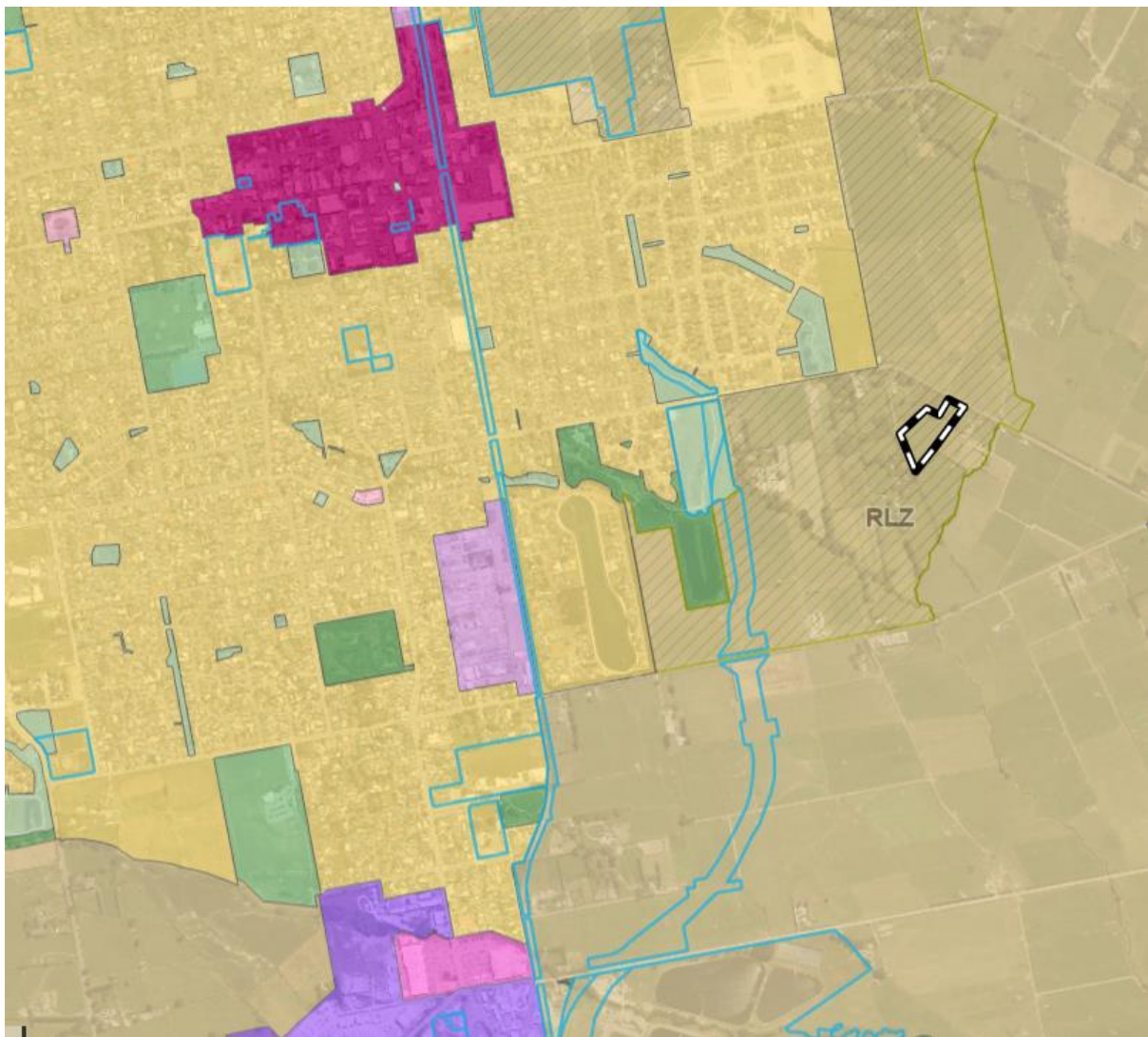


Figure 42 South East Rangiora development area

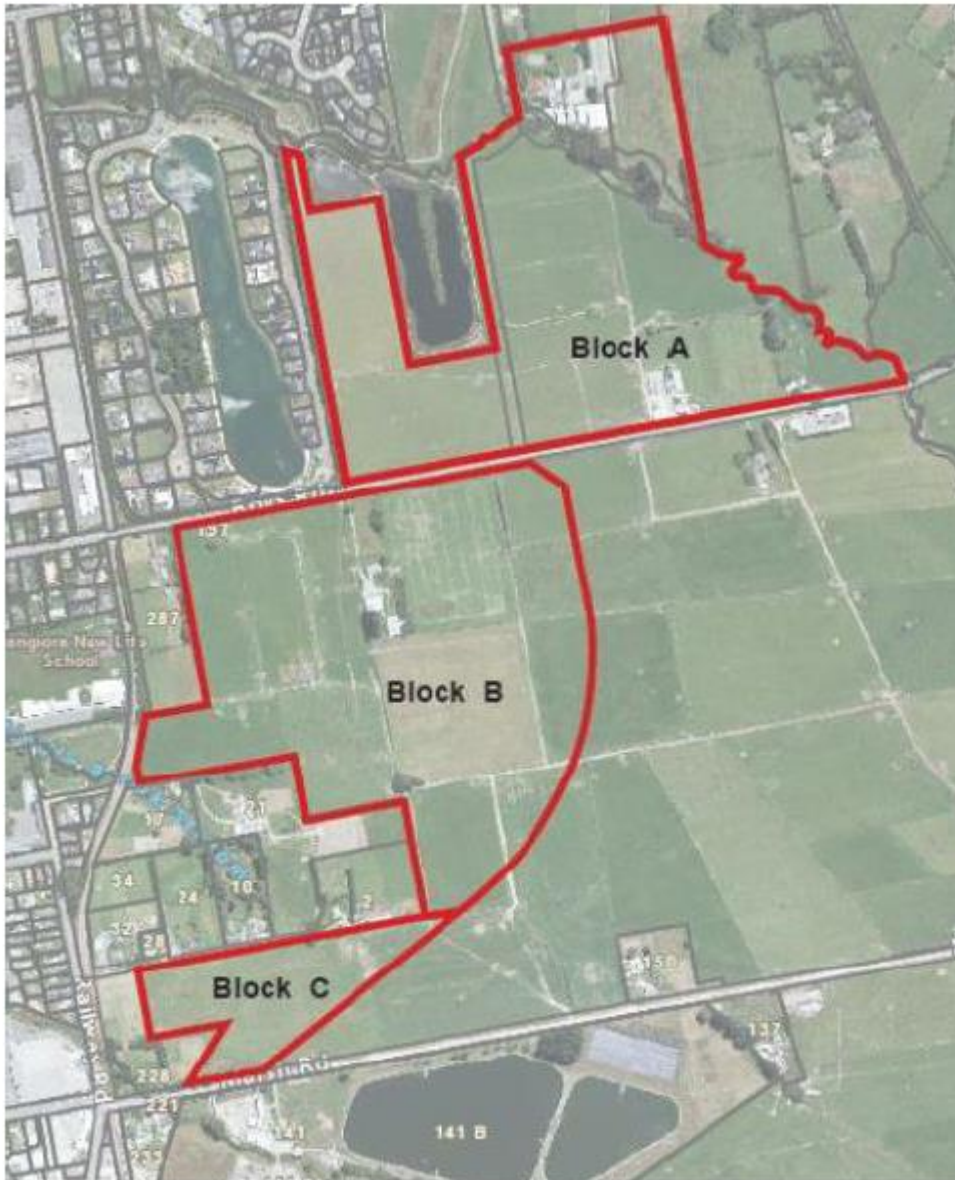


Figure 1: Location of Blocks A – C, Submission #183 (evidence of Ms Lisa Williams, Figure 1, reprinted).

Figure 43 All Spark proposal blocks

7.3.1 Matters raised by submitters

610. The Sparks Block A area is:

- Currently zoned as rural in the operative district plan;
- Proposed in the PDP as RLZ;
- Inside of the projected infrastructure boundary, as set out in Map A of the CRPS;
- Inside the south-east Rangiora new development area, which is an FDA as set out within Map A of the CRPS; and,

- Has an ODP for the site within the operative or Proposed Plan.

611. Richard and Geoff Spark [183.16] seek to rezone all land (approximately 30ha) in the vicinity of Boys Road and Marshes Road, in south eastern Rangiora, west of the proposed eastern link to general residential and medium density residential. This is opposed in a further submission by Bellgrove Rangiora Ltd [FS 85], and supported by Kiwirail [FS 99].

7.3.2 Assessment

Natural hazards, geotechnical

612. Mr Aramowicz's summary advice is:

- *Current flood hazard mapping on WDC's GIS for a 0.5% AEP event (i.e. 200 yr ARI) and for the Ashley River breakout scenario indicates two large overland flow paths will occur across the site, each with a low-medium flood hazard. These are associated with North Brook at the north part of the site, and Middle Brook which is close to Gefkins Rd.*
- *In summary, the site contains soft ground and peat. Subdivision design and construction will need to be undertaken in a way that minimises the risk of subsidence to future roads, underground services and building foundations.*

3 waters

613. Mr Aramowicz's summary advice is:

- *Based on existing flood hazard modelling, I expect that with careful engineering, the effect of any additional stormwater runoff from a future subdivision to the Silverstream/Kaiapoi area can be largely mitigated using onsite and/or offsite attenuation. The FT report did not investigate this.*
- *Site [is] within RGA32 & 43 growth areas, and there are existing services at the boundary. Note, however, WDC ultimately proposes a pumped sewer to provide capacity to Bellgrove, which would also service this site. Trim 23120619569 WDC Water and Wastewater 50yr scheme upgrade report identifies need for WDC to provide East Rangiora Stage 2 and Stage 3 in due course to service eastern Rangiora developments.*
- *WDC 50yr water & wastewater scheme upgrade report, trim 231206196569, identifies the future need for the Marsh Rd Supply main and Boys Rd Booster Main to service the area. In summary, there are no water supply constraints that would prevent the proposed land use.*

Transport

614. Mr Gregory's summary advice is:

- *Supportive of the Block A rezoning overall, including the updates to the ODP, and the realignment of the REL (Rangiora Eastern Link bypass road).*
- *Notes that the commercial node may result in activities that are more transport intensive than a café, and that this is more likely to be an issue if this area has direct access to the REL road. The transport evidence of Ms Williams of 33 trips for a café at this location may be too low, with the trip count likely being higher, at between 53-80 trips.*

- *Opposes the site having direct access to the new arterial REL road, with local road access being provided by collector roads.*
- *Ensuring the ultimate location of the local centre zone being walkable from across the development, preferring a location closer to the centre of Block and Block B, if Block B is approved.*
- *Based upon previous planning work which I have undertaken for the REL Road, the proposed trip generation potential is the equivalent of approximately 13% of the Rangiora East growth area.*
- *Boys Road requires upgrading to support Block A. The requirement must also meet the needs of Block B, and be developer-led and funded. Block B would also require inclusion within the REL Road Development Contribution area.*
- *On Block C, I do not consider there is enough information in order to support future rezoning at this stage. The trip generation assumed in the evidence of Ms Williams is very low, and in my opinion further assessment is required based on higher figures.*
- *Although detailed traffic assessment would be 'required at a later date'⁹⁰, an estimate of 100 – 200 vehicles per hour is suggested, based on a range of 0.5 – 1 trips⁹¹ per 100 m². In my own assessment, referring to an alternative source widely used in the industry⁹², there are a range of three activities which could feasibility establish in the proposed site, generating between 1 and 6.2 vehicle movements per 100 m². The potential difference of 1,000 vehicles per hour could result in effects of a more than minor degree of severity.*

Greenspace

615. Mr Read makes the following comments⁹³:

- *“RE the Sparks Land, we originally had 3 parks...with the primary community destination park being adjacent to – and integrated with – the Northbrook Stream 20m esplanade reserve requirement. The 3rd and smallest park (0.3ha) was supposed to be assimilated into one or both of the others to increase their overall size, but this increase is not discernible on the plans. Assuming it's warranted by the total lots and associated resident population within the Sparks land, then I agree that one or both of the parks north of Boys Rd should be increased in size.*
- *Note also that any significant residential development approved on Sparks land to the South of Boys Rd will also require a small neighbourhood park. This could potentially be flat/dry land connected to the significant SMA (Stormwater Management Area) provision likely to be required. The Boys Road corridor is a significant barrier to safe community access to the parks north of Boys Rd...so an additional park space is needed”*

Urban design

616. Mr Jolly makes the following comments⁹⁴:

⁹⁰ Evidence of Ms Williams, paragraph 24

⁹¹ RTA Guide to Traffic Generating Developments

⁹² NZTA Research Report 453 (2011): Trips and Parking related to land use

⁹³ Email of Monday 1 July in response to Peter Wilson questions on original evidence.

⁹⁴ Email of 10 May 2024 to Peter Wilson

- *The curving of the roads is indicative and shows that there is need to avoid these being direct routes between Boys Road and the REL, this is because we don't want people short cutting through the local residential streets. I.e., we want to avoid creating a rat-run through residential roads over the collector / arterial roads. There are other ways this can be reinforced through design but the ODP is indicative and this is a good way to show that intent. There is also some co-ordination of roads with flood management and other servicing requirements that needs to be taken into account.*
- *The very clear direction from Councils transport team was to avoid the secondary roads being cross-roads intersections over Boys Road. To maintain connectivity as best we could the design provided staggered T intersections to separate vehicular traffic but allowed for direct pedestrian and cycle connections via alignment of the green link south of Boys Road to be located near the secondary road for more direct active transport connections.*
- *There is also specific discussion of the various options for access to the Industrial area in the ITA.*

Applicant evidence

617. Applicant expert evidence

<u>Person/Organisation</u>	<u>Evidence type</u>
Mr Alastair McNabb	Infrastructure and Servicing
Mr Mason Reed	Geotechnical
Mr Sean Finnigan	Soil Contamination
Mr Ivan Thomson	Planning
Mr Matt Lester	Landscape
Mr Amir Montakhab	Flooding
Ms Lisa Williams	Transport
Mr Stuart Ford	Productivity and NPSHPL
Mr Fraser Colegrave	Economics
Ms Cathy Niewenhuijsen	Odour
Ms Nicole Lauenstein	Urban Design
Mr Mark Taylor	Ecology

Discussion

618. Whilst I have outlined the Block B and Block C proposals here as they form part of the overall submission, I will assess Block B and C below as they are outside of the development area. I would expect that in the event that staging was required, that Block A would go first, however, I do not consider that a staging rule is required, just that this would appear to be the most efficient and thus likely development pathway based on distance to services. Block B is not significantly further from services than Block A.

619. The engineering assessments are as above for Bellgrove South, although I note my personal observations that the water table does become higher in the south of the block, as the distance between the surface and groundwater reduces. I consider that this means that careful engineering is required for developments in the southern part of the block.

620. I agree with Mr Gregory that:

- The location of the commercial node should be central across both blocks, within walking/cycling distance
- That the REL should be protected by limiting access points to it, with the development served by local roads only.

621. I agree with Mr Jolly that connections need to be retained to the east, as per the notified ODP. This connection appears to have been removed from the applicant’s ODPs, however, it remains in the notified ODP.

622. I note the opposition from Bellgrove Rangiora in their further submission, but after discussions with submitters, I consider that this was in relation to the integration matter, and that the matter is now resolved, or if not, there is a pathway to resolving it with continued discussions over the more technical elements of the ODP. If this has not yet been resolved, or is not resolved during this hearing process, I consider that it is of a nature that it can be handled during consenting, and would recommend wording in the ODP to this effect.

Overall consideration

623. Under policy interpretation approach 2, I consider that the land provides significant development capacity in the context of NPSUD Policy 8, as well as contributing to a well-functioning urban environment, as it is an anticipated and planned urban environment, contained within existing policy documents.

624. The primary test for rezoning on this land is CRPS Policy 6.3.12, with its specific tests that apply to the use of land within future development areas.

- The area is of low flood hazard.
- Provided that development occurs according to the recommended ODPs, it would achieve a consolidated and integrated urban form.
- Infrastructure can be efficiently and economically provided to it.
- The block of land has a primary developer, who is the existing primary landowner in the area (Sparks)⁹⁵.
- I note that the capacity tests in 6.3.12(1) are to provide for medium term demand only. However, in the context of an NPSUD, at least sufficient test, I do not consider that I am limited to providing for medium term demand only, and can consider long-term demand. I note that I do not consider there to be a short to medium term shortfall in supply in the district.

625. I consider that the land within the development area can be rezoned, if there is scope from submissions.

626. I assess the scope for rezoning from the submissions below:

Submitter	Number	Land Included in submission	Zoning sought

⁹⁵ My understanding as of July 2024.

Richard and Geoff Spark	183.16	All land (approximately 30ha) in the vicinity of Boys Road and Marshes Road, in south eastern Rangiora, west of the proposed eastern link	General residential and medium density residential.
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627. Both medium density residential and general residential are available as rezoning options. However I note the difference in height between the PDP general residential zone of two storeys, and the PDP medium density residential zone, of three storeys, which could be an issue on the western boundary, however, I note that this will be discussed in hearing stream 7.

628. I consider that there is a substantive difference between the 500m² allotment size of the general residential zone and the 200m² size for the PDP medium density residential zone, and that the required 15 households per ha yield in SUB-S3 would be unable to be achieved with 500m² minimum lot sizes. I thus recommend PDP medium density as the most preferable option.

629. I recommend that the Sparks Block A area is rezoned to PDP medium density residential, with the following additions to the ODP:

- A prohibition on access points to the REL, with these access points to come from local roads instead;
- The final determination of the location of the commercial node to occur after recommendations on Blocks B and C, with narrative text being placed in the ODP to this effect.
- That the access to the eastern part of the development area over the Northbrook Stream as appears on the notified ODP remains.
- I note my recommendations in respect of waterways, including drains, springheads, and any wetlands that may be identified, as above.

7.3.3 Recommendations

630. That the following outcome for submissions occurs:

- Further submissions FS Bellgrove Rangiora Ltd [FS 85] is **rejected**
- Richard and Geoff Spark [183.16], Survus Consultants Limited [250.6] are **accepted**.
- Further submissions Kiwirail [FS 99] is **accepted**
- CSI Property Limited [212.1] is **accepted in part**

7.3.4 Plan-enabled capacity arising from this recommendation

631. I consider the following plan enabled capacity arising from these recommendations:

- For the Sparks Block A proposal, as an anticipated urban environment, there is 30ha of land available for residential development.

- This land has a relatively high reserve requirement, as well as a proposed commercial zone, although I note my recommendation to potentially move the commercial zone to be sited between Block A and Block B. On the basis of the ODP, and the currently achieved roading reserves of between 18% and 25% across the District, I consider that the reserve requirements for this land are about 45%.
- This results in a plan-enabled capacity of 275 at 600m², of 825 at a full MDRS scenario of 200m², and 550 as an average scenario.

7.3.5 Amendments

632. I recommend that the planning maps for the Sparks Block A area are changed to rezone it to PDP medium density residential, with the following additions to the ODP:

- A prohibition on access points to the REL, with these access points to come from local roads instead;
- The final determination of the location of the commercial node to occur after recommendations on Blocks B and C.
- That the access to the eastern part of the development area over the Northbrook Stream as appears on the notified ODP remains.
- I note my recommendations in respect of waterways, including drains, springheads, and any wetlands that may be identified, as above.

7.4 Sparks Block B and C

7.4.1 Matters raised by submitters

633. The Sparks Block B (24 ha) and C areas (3 ha) are:

- Currently zoned as rural in the operative district plan;
- Proposed in the PDP as RLZ;
- Outside of the projected infrastructure boundary, as set out in Map A of the CRPS;
- Outside of the south-east Rangiora new development area;
- Does not have an ODP for the site within the operative or Proposed Plan; and,
- Contained and bounded by a planned and designated infrastructure development, the proposed Rangiora Eastern Link (REL)

634. Richard and Geoff Spark [183.16] seek to rezone Block B and Block C of their proposal.

7.4.2 Assessment

Sparks Block B and Block C

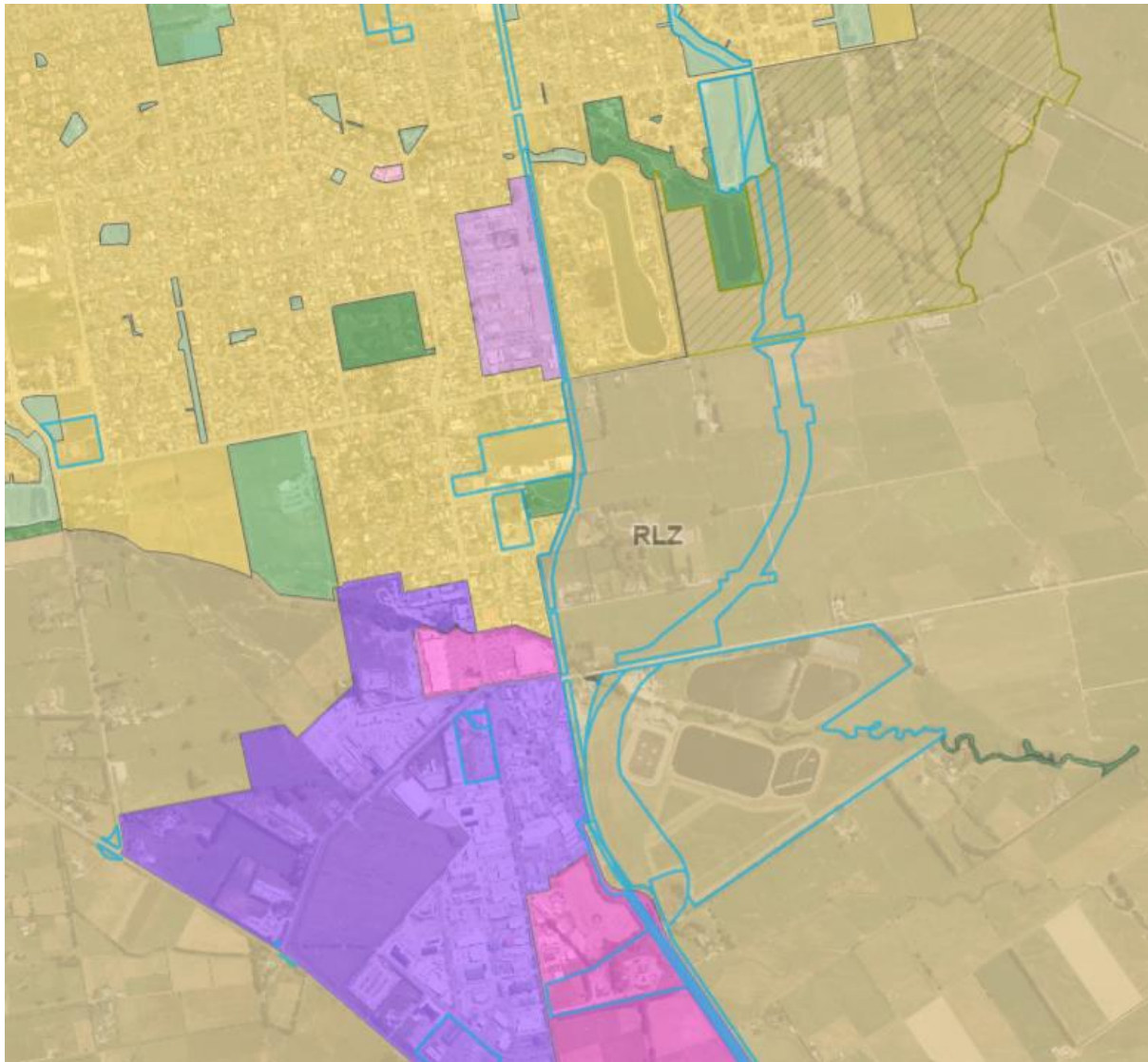


Figure 44 Sparks Block B and C

635. The engineering advice is the same as for Bellgrove South and Sparks Block A above, and does not outline any specific constraints, other than my consideration that the land becomes more low lying and potentially more water logged the further south one progresses in this area.

636. In considering Block B and Block C, I consider the following:

- The designation of the Rangiora Eastern Link (REL) road, which bisects the current Sparks property, and would result in an orphaned parcel of land, that according to Mr Stuart Ford, would become uneconomic for rural productive use.
- The land is outside of the shaded areas in Map A, CRPS, however, if and when built, the REL would form a logical and natural boundary for the town.
- The REL may create noise issues on the Block B properties, which are shown as extending to the REL, with only a limited buffer.
- An appropriate buffer with the existing rural lifestyle properties between Gefkins Road and Dunlops Road.

- The Rangiora sewage treatment ponds, which places a constraint on the southern end of the site due to odour.
 - The need to ensure that Block B and Block C are appropriately integrated by way of local roads, without reliance on the REL, as proposed by the submitters, both to ensure integration with the town, and to reduce constraints on the REL, which is intended as a strategic/arterial road.
 - The need to ensure appropriate future transport connections for Block C, if it is rezoned as commercial or industrial.
 - The differences between commercial/mixed use and industrial zoning for Block C, especially in the context of the surrounding rural lifestyle land use and potential sensitivity issues on that land, which would become somewhat sandwiched between the Block B residential to the north, and the Block C commercial/mixed use/industrial to the south, and the railway to the west.
637. For cultural matters, I note that Block B is covered by SASM 016 – a ngā tūranga tūpuna cultural landscape overlay, that represents the extent of the former podocarp forest that centred on present day Rangiora. I note that the exact nature of this cultural overlay has not been outlined by the submitters' evidence, although Ms Lauenstein and Mr Thomson do refer generally to these matters in their evidence.
638. I would expect some consideration and incorporation of this feature into the subdivision design.
639. For transport, I consider that access to the site should be provided off Boys Road, rather than the proposed REL. However, this also risks the site having only one access point, which creates substantial connectivity, integration, and safety issues. It would be possible to provide two accessways off Boys Road which might eliminate some of this concern, however, I still would not consider this development well-integrated in the context of the connections that other Rangiora developments have.
640. Access to the west is largely constrained by the Main North railway line, however, there are existing uncontrolled railway crossings on the unsealed Gefkins Road and the sealed Dunlops Road, which services the large lot residential area. Both of these would provide options to connect the area to the west, without needing new level crossings, however the level of traffic generated may require upgrading to controlled level crossings, with either lights and/or barrier arms. There is also the potential to rationalise access to the southern part of the area, but this would also require the rezoning and development of all of the existing LLRZ, which I consider is outside of the scope of submissions.
641. I spoke to Mr Thomson about these issues on 20 June 2024, and my understanding of the conversation was that on behalf of his client, they were amenable to amending the access points, and would likely remove these from the REL in favour of local roads.
642. For Block C, I note what may be an access off the REL into the proposed commercial or mixed use site.
643. I am minded to still recommend rezoning of the Block B area to PDP medium density residential, conditional on these changes being incorporated into the ODP.

644. For Block C, I agree with Ms Nieuwenhuijsen⁹⁶ that Block C is too close to the Rangiora sewage treatment plant oxidation ponds to be appropriate for residential development, but I consider that that commercial or industrial land use would be appropriate, which Mr Thomson also considers. I note Mr Willis' statements about the potential for a shortfall of general industrial land in the medium term⁹⁷, and consider that this additional Block C would assist in the tight supply situation for this type of land, provided any associated noise issues can be addressed on both existing dwellings and any new dwellings in Block B, if rezoned.
645. However, I consider the substantial differences between commercial/mixed use and industrial land uses, and their respective sensitivity issues on the existing rural lifestyle neighbours at 228 Marsh Road, and between 2-32 Dunlop Road (consisting of a number of sub 4ha sections, comprising 11.3 hectares in total). I also note the lack of clarity on connection with the REL, Marsh Road, or both.
646. There is submission scope to consider rezoning these areas from the CSI Property Limited submission (see below), however, given the substantial number of affected landowners, and no submissions from them, their lack of inclusion in a development area, and the absence of evidence from this submitter on the particular zones required, I do not recommend rezoning Block C at this time.
647. However, if the surrounding land is developed there will be a need to incorporate and integrate these into the wider ODP, and the rural lifestyle owners may also want to consider their options. I consider this a matter for a future plan change.
648. Because of the potential for development and the submission from Sparks requesting it on what would otherwise be an orphaned parcel, I recommend that an overlay of potential CMUZ/GIZ is added over Block C. The land would remain as rural lifestyle as notified, however, the future intent is signalled. I note that overlays have no provisions associated with them.

Overall considerations

649. Sparks Block B and C are on land that is outside the shaded areas in Map A, CRPS. As such, I must consider them under the responsive planning provisions in Objective 6 and Policy 8 NPSUD. I consider the following:
- I consider that the Block B rezoning in the context of NPSUD objective 6 integrates with the Rangiora Eastern Bypass for the purposes of infrastructure planning, and is strategic over the medium term, by aligning the Rangiora urban boundary with the REL in this location.
 - That Sparks Block B provides significant development capacity in the form of an additional 230 to 280 dwellings, as stated by the submitter, and contributes to a well-functioning urban environment primarily by infilling a parcel of rural land that is cut off from the surrounding farm by way of a new transport link and which would lack any other productive use.

⁹⁶ Para 51 of her evidence in chief

⁹⁷ Para 82, https://www.waimakariri.govt.nz/__data/assets/pdf_file/0025/162538/STREAM-12A-REZONING-CMUZ-INZ-SECTION-42A-REPORT.pdf

- For Block C, I do not have enough information to make a recommendation on its future zone, however I do agree that it needs to be rezoned, so I am recommending that the development area is extended to cover this area, to signal its future potential.

650. Policy interpretation approach 2 in turn requires an assessment against the CRPS. I begin with CRPS 6.3.11(5) as it is an extension an alteration of a future development area and I consider this provides a useful summary of the CRPS provisions:

- Infrastructure is in place, or able to be provided economically and efficiently
- Provision has been made for safe and convenient access to community, social, and commercial facilities.
- Urban consolidation is achieved, and the proposal assists with this, by avoiding an otherwise orphaned parcel of rural land cut off by the REL.
- The future urban land use does not contaminate any drinking water sources, including groundwater recharge zones.
- Sufficient rural land is retained to maintain the open space character either between or surrounding the areas of urban activity within Greater Christchurch.
- The operational capacity of strategic infrastructure is not compromised, particularly if any ODP changes remove the connections to the REL.

651. Additional CRPS provisions apply. In particular, I note:

- CRPS policy 6.3.1(1) – give effect to the urban form outlined in Map A, CRPS, when planning for future growth and infrastructure delivery.
- 6.3.5 – integration of land use and infrastructure, particularly 6.3.5(2), coordination of new development areas with future investment in transport infrastructure.
- 6.3.6 – business land, location of new areas for commercial activity close to existing activity centres.

652. For Block B, the future land use of residential can be assessed now.

653. For Block C, the future land use, which is likely to be either industrial or commercial, or a mixture of both, cannot be assessed now, but it can still be recommended as a future development area.

654. I have considered whether or not to extend the future development overlay to the rural residential properties in Gefkins Road and Dunlops Road, and decided not to recommend this for these properties at this time. I note that when a plan change or proposal is received for Block C, the surrounding land use can be considered at that time.

655. I assess scope for the rezoning below:

Submitter	Number	Land Included in submission	Zoning sought
Richard and Geoff Spark	183.16	All land (approximately 30ha) in the vicinity of Boys Road and Marshes	General residential and medium density residential.

		Road, in south eastern Rangiora, west of the proposed eastern link	
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656. Both medium density residential and general residential are available as rezoning options. However I note the difference in height between the PDP general residential zone of two storeys, and the PDP medium density residential zone, of three storeys, which could be an issue on the western boundary, and around the boundary with the rural residential however, I note that this will be discussed in hearing stream 7.

657. I consider that there is a substantive difference between the 500m² allotment size of the general residential zone and the 200m² size for the PDP medium density residential zone, and that the required 15 households per ha yield in SUB-S3 would be unable to be achieved with 500m² minimum lot sizes. I thus recommend PDP medium density as the most preferable option.

658. I thus recommend rezoning Block B as PDP medium density residential, subject to the following ODP changes:

- Access points removed from the REL
- New access points to Block B from local roads.
- The ngā tūranga tupuna cultural landscape, representing former extent of a podocarp forest that centred on Rangiora, is incorporated into the design.

659. I recommend not rezoning Block C as general residential, retaining it as rural lifestyle.

660. I recommend that the future development area overlay is extended to Block C receive an overlay outlining its future use, and an appropriate paragraph of narrative text in the overlay explaining this⁹⁸.

7.4.3 Recommendations

661. That the following outcome for submissions occurs:

- Richard and Geoff Spark [183.16] is **accepted in part** in relation to the Block B rezoning proposal.
- Richard and Geoff Spark [183.16] is **rejected** in relation to the Block C rezoning proposal.
- Richard and Geoff Spark [183.16] is **accepted in part** in relation to the extension of the South East Rangiora Development Area to include the Block C land.

7.4.4 Plan-enabled capacity arising from this recommendation

662. I consider the following plan enabled capacity arising from these recommendations:

- For the Sparks Block B and C proposals, these are unanticipated urban environments.
- There is about 24 ha of land in Block B. I would expect that reserve requirements on this land are between 30%-40%, based off the submitter's ODP. I have assessed a conservative

⁹⁸ I discussed this with Mr Thomson, consultant planner for the Sparks, and my recollection of the conversation was that there was agreement on this approach

requirement of 40% reserves, noting also that the commercial centre may be on part of Block B, resulting in less land available for housing.

- This results in a plan-enabled capacity of 240 at 600m², of 720 at a full MDRS scenario of 200m², and 480 as an average scenario. This is substantially higher than what the submitter has proposed the yield will be.
- As with other broad capacity assessments, I consider that my recommendations in respect of capacity can be refined following the hearing in my Right of Reply.
- I have not assessed the capacity of the business or industrial use on the 3ha Block C, other than to note it is additional potential capacity represented in my recommendation to extend the development area overlay, but it is not plan-enabled.

7.4.5 Amendments

663. I recommend that the planning maps for the Sparks Block B area are changed to rezone it as PDP medium density residential, with the following additions to the South East Rangiora ODP:

- ODP added to the ODP within DEV-SER-APP1
- Access points removed from the REL
- New access points to Block B from local roads.
- The ngā tūrangā tupuna cultural landscape, representing former extent of a podocarp forest that centred on Rangiora, is incorporated into the design.

664. I recommend that the Sparks Block C area is included within the South-East Rangiora development area, with an explanation outlining its potential suitability for commercial or industrial uses.

7.5 Remainder of area

7.5.1 Description and matters raised by submitters

665. This area is:

- Currently zoned as rural in the operative district plan;
- Proposed in the PDP as RLZ;
- Inside the projected infrastructure boundary, as set out in Map A of the CRPS;
- Inside the south-east Rangiora new development area; and,
- Has an ODP for the site within the operative or Proposed Plan.

666. The remaining area of the south-east Rangiora development area is 25.8 ha, consisting of 6 titles. Of the titles, part of the property at 65 Northbrook Road is requested to be rezoned by CSI Property [212.1], and all of it is requested to be rezoned by Survus Consultants Ltd [250.6].

7.5.2 Assessment

667. The following remaining properties do not have their own rezoning submissions:

- 69 Northbrook Road (owned by Checketts Trustee Ltd),

- 75 Northbrook Road (owned by Anthony Jon Downes),
- 91 Northbrook Road (owned by Alan James Rawlings, Tui Rose Ching),
- 99 Northbrook Road (owned by Northbrook Estate Ltd),
- 105 Northbrook Road (owned by David Alexander Hunt, Sharon Frances Hunt),
- 117 Northbrook Road (owned by Northbrook Global Group Limited)

668. However, there is an overarching submission seeking rezoning all of the area from Survus Consultants Ltd, which I consider creates scope for considering rezoning of all of the area.

669. I consider that both general residential and PDP medium density residential are rezoning options.

670. The advice from Council and other experts is as above for the Sparks proposal. I do not consider there are any substantial technical constraints to rezoning the land, however, detailed evidence has not been received as there is currently no primary developer in the area. I do not have evidence before me to consider feasibility at this time.

671. Given the lack of a primary developer, and submissions from landowners, I am minded to recommend that this area remains as rural, proposed for rural lifestyle, within the development area overlay.

672. It remains available for future development

7.5.3 Recommendations

673. I recommend the following outcome for submissions:

- Survus Consultants Ltd [250.6] is **rejected** [in relation to this part of the development area only]
- CSI Property [212.1] is **rejected** [in relation to this part of the development area only]

7.5.4 Plan-enabled capacity arising from this recommendation

674. This land, whilst not recommended for rezoning, would provide the following capacity:

- As the land is intersected by a number of streams, and has a high water table, I expect that the reserve requirements on it would be higher than for other blocks, potentially in the order of 50% or more.
- If accepted, it would result in a plan-enabled capacity of 208 at 600m², of 625 at a full MDRS scenario of 200m², and 417 as an average scenario.

7.5.5 Amendments

675. I recommend no changes to the Proposed Plan arising from these submissions

7.6 CSI submissions

7.6.1 Matters raised by submitters

676. This area is:

- Currently zoned as rural in the operative district plan;

- Proposed in the PDP as RLZ
- Mostly outside projected infrastructure boundary, as set out in Map A of the CRPS.
- Mostly outside the south-east Rangiora new development area.
- For the sites outside the projected infrastructure boundary, does not have an ODP for the sites within the operative or Proposed Plan.

677. CSI Property Limited [212.1] oppose rural lifestyle zoning for the following properties in the southern part of Rangiora and seek residential zoning for them:

Boys Road

- 149, 243, and 287 Boys Road
- 149 Boys Road, 243 Boys Road, and 287 Boys Road are not within SER DEV area. 287 Boys Road, owned by Keith Dale Hewinson, may be in the Sparks Block B proposal.

Marsh Road

- 4, 137, 150 and 228 Marsh Road.
- 4 Marsh Road (owned by Peter Robin Amer), 137 Marsh Road (owned by Michael David Pearson), 150 Marsh Road (owned by Karen Linda Gurney) and 228 Marsh Road (owned by David Paul Ford, Rachel Ann Ford) are not within the DEV area.

Dunlops Road

- 2 24, 28, 32 and 34 Dunlops Road,
- 2 Dunlops Road (owned by Neale Leon Winter, Sharon Margaret Winter), 10 Dunlops Road (owned by Carlanna Trustees Limited), 24 Dunlops Road (owned by Pauline Maree Riddell, Robin William Riddell), 28 Dunlops Road (owned by Jenny-Lee Parata), 32 Dunlops Road (owned by Tracy Celina Ford) and 34 Dunlops Road (owned by Tracy Celina Ford) are not within the DEV area.

Gefkins Road

- 17 and 21 Gefkins Road,
- 17 Gefkins Road (owned by CKLaw Trustees Limited, Linda Mary James) and 21 Gefkins Road (owned by Carlanna Trustees Limited) are not within the DEV area.

Camside Road

- 109 Camside Road
- 109 Camside Road (owned by Jill Valerie Amer, Raymond George Amer) is not within the DEV area

7.6.2 Assessment

678. I consider that there is scope from submissions to consider rezoning of the listed properties within the CSI submission, to either general residential or medium density residential, but only those listed properties. There is no general overarching submission that covers the land between the properties.

679. I am not clear on the relationship between the submitter and the landowners. The submitter does not appear to be a landowner for any of the properties listed. I note that where this submitter has sought rezoning of some properties, they have not sought rezoning of all of the properties in that area – the properties proposed for rezoning by this submitter are not contiguous. Most of the properties are outside of the South-East Rangiora development area.
680. This submitter has not provided any evidence to support these submissions, and noting my test for rezonings outside of development areas in the absence of landowner submissions, I cannot support this submitter's requests. I am also not minded to recommend spot-zoning.
681. I thus cannot recommend rezoning these properties, and recommend that they remain as rural (proposed for rural lifestyle). Where some may be within the remaining portion of the south-east Rangiora development area, recommendations for this area have been made above.

7.6.3 Recommendations

682. That the following outcome for submissions occurs:

- That CSI Property Limited [212.1] is **rejected**

7.6.4 Plan-enabled capacity arising from this recommendation

683. As I consider I lack evidence on the exact nature of this rezoning, I have not assessed it for capacity purposes at this time.

7.6.5 Amendments

684. There are no amendments to the Proposed Plan arising from these recommendations.

8 Other

8.1 Summerset (South Rangiora)

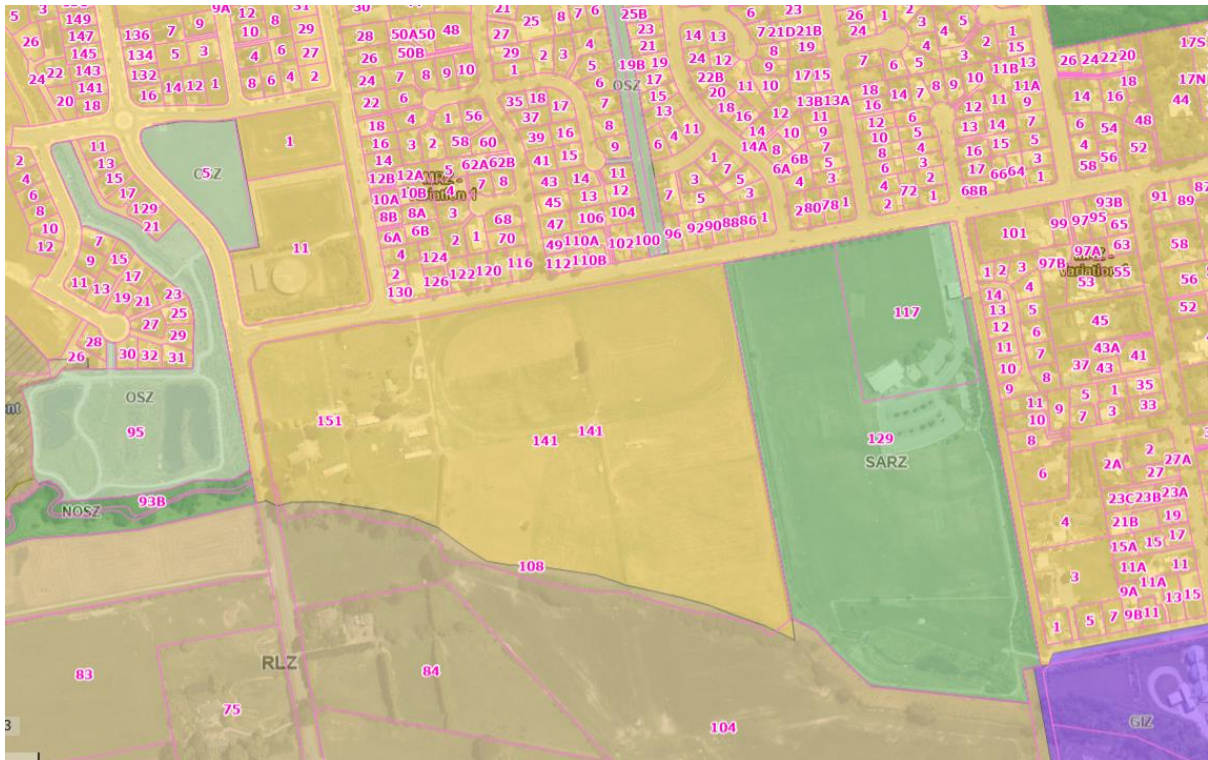


Figure 45 Summerset boundaries

8.1.1 Matters raised by submitters

685. This area is:

- Currently zoned as rural in the operative district plan;
- Proposed in the PDP as RLZ
- Proposed as medium density residential under Variation 1
- Inside the projected infrastructure boundary, as set out in Map A of the CRPS.
- Inside the south-west Rangiora new development area.
- Has an ODP for the site within the operative or Proposed Plan.

686. Summerset Retirement Villages [207.1] request for the general residential zoning of their retirement village land to be amended to align with their property boundary, in order to reflect plan change 29. This is opposed in a further submission by Kainga Ora [FS 88], and supported in part by KiwiRail [FS 99]

8.1.2 Assessment

687. In considering this submission, I note the proximity of the site to the Southbrook Stream, and the parcel boundary that for the most part appears to follow the centre line of it. I consider that this is the reason that the both the general residential zone boundaries and the Variation 1 medium density zone boundaries were not extended to the edge of the Summerset parcel,

as the section 230 RMA requirements for esplanade reserves, set a minimum of 20m for esplanade reserves.

688. Then there is the additional NATC setbacks for NATC-UNSCHEDULED⁹⁹ waterways will require a further 5 metre setback from any adjacent open space zone or residential zone.

689. I have read the decision on private plan change 29, and I note that the decision altered the operative district plan rule 33.1.7 to require the esplanade reserves in this location to conform with the dimensions on the South Belt ODP (Operative District Plan Map 184):

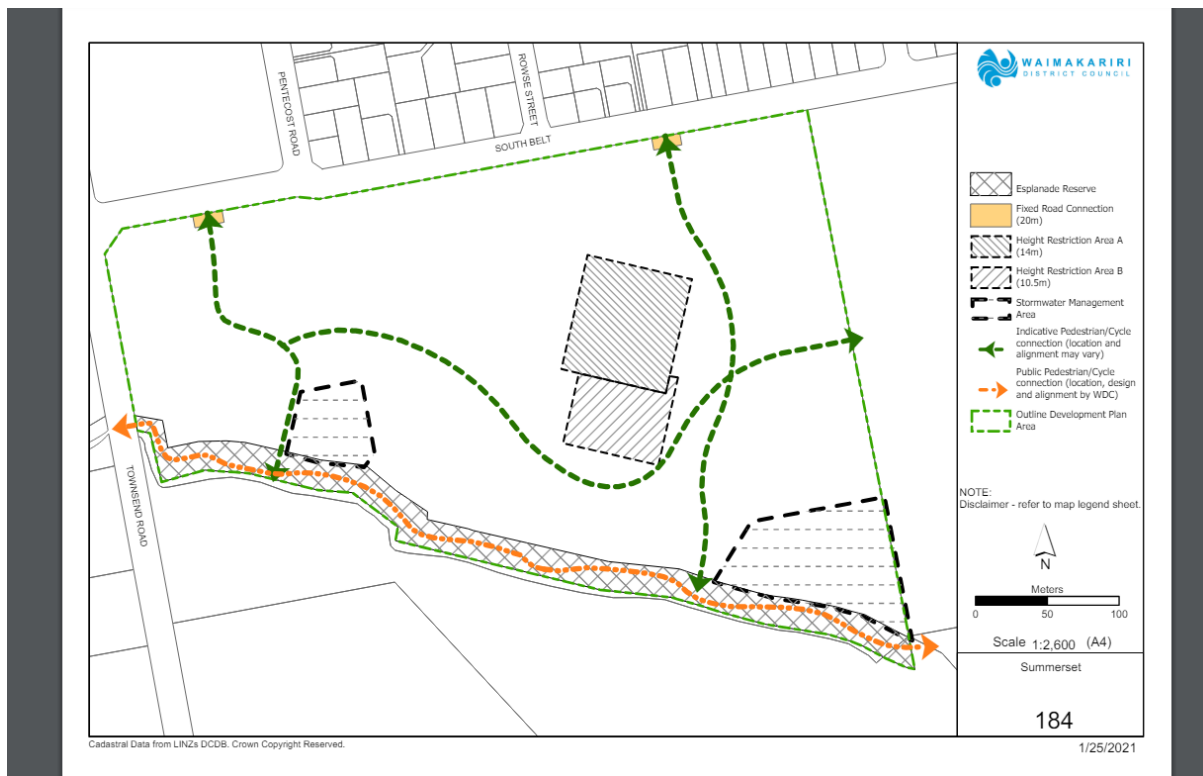


Figure 46 Map 184, Operative District Plan

690. The ODP requires between 10m and 20m esplanade reserves, however the current district plan mapping only shows about a 5m distance between the stream and the zone boundary. More land will be required for the open space reserves that form the esplanade reserve, and as these will be a separate parcel of land following subdivision of the Summerset site, then the Summerset parcel will reduce in size because of the setting out of the reserves. As such, I cannot support the Summerset relief.

691. I also note that other Summerset relief which supports the development occurring in accordance with DEV-SBT-APP1, which sets out this ODP as above.

Potential integration issue

692. In reviewing the NATC provision,

8.1.3 Recommendations

693. I recommend the following outcome for submissions:

⁹⁹ I have proposed that this becomes NATC-SCHED4 in my hearing 4 evidence.

- Summerset [207.1] is **rejected**
- Further submission Kainga Ora [FS 88] is **accepted**
- Further submission Kiwirail [FS 99] is **rejected**

8.1.4 Plan-enabled capacity arising from this recommendation

694. This land has been rezoned under the operative district plan, and is included in Council's land uptake monitoring survey, so no future capacity arises from it.

8.1.5 Amendments

695. I recommend no changes to the PDP arising from these submissions.

9 Rezoning requests in and around Woodend

696. I deal with the specifics of each area in respect of the individual rezoning proposals, or groups of proposals, below.

697. The cultural advice is as set out above, requiring the achievement of the following in respect of this block (area 5) in the MKT report:

- *Waterways should be protected and enhanced with suitable setbacks and riparian buffers planted with indigenous species (see policy WM12.5).*
- *There should be a survey undertaken to identify springs and/or wetlands on the site. This should be undertaken by a suitably qualified expert. Springs and wetlands should be protected and enhanced with suitable setbacks and indigenous riparian planting.*
- *Areas identified as culturally sensitive should be protected and enhanced. Consultation with the Papatipu Rūnanga may be required to determine culturally appropriate methods of enhancement.*
- *Low impact design methods, such as, the use of rain and greywater collection and re-use systems, and minimising impervious surface area is encouraged. Refer to Ngāi Tahu Subdivision and Development Guidelines (Appendix 1) for low impact design methods endorsed by mana whenua.*
- *Contaminated sites should be remediated. All contaminated material should be removed from the site and disposed of at a licensed facility.*
- *Measures to minimise earthworks should be considered at the design phase of development.*
- *Earthworks in areas with shallow depth to groundwater and/or over an aquifer can have significant cultural impacts and are of concern.*
- *The site should be surveyed by a suitably qualified person(s) to determine whether there are taonga species within the site that need to be protected.*
- *Refer to Ngāi Tahu Subdivision and Development Guidelines (Appendix 1) for guidance on stormwater, water supply and wastewater servicing.*
- *Note: The list of recommendations is preliminary, general/non-specific and non-exhaustive and is provided as preliminary guidance only.*

698. I note the following sites of significance to Māori (SASM) and other heritage listed items in the area:

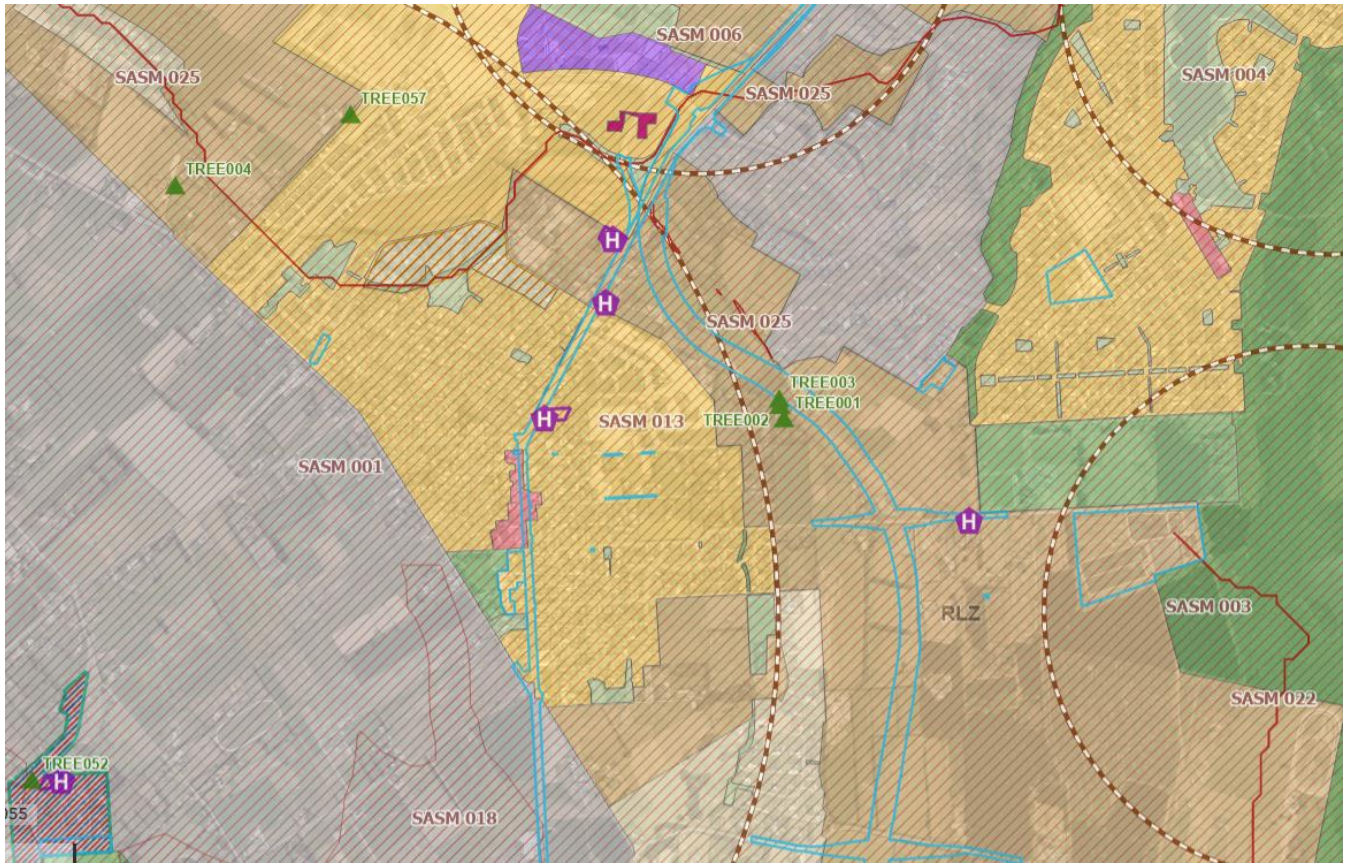


Figure 47 Cultural and heritage aspects of Woodend

699. There are three SASMs 001, 013 and 023 within Woodend:

- SASM 001 is wahi tapu 'silent' file.
- SASM 013 is nga turanga tupuna, encompassing the cultural landscape of Waimakariri ki Rakahuri, the contemporary and ancestral coastal settlement comprising significant clusters of recorded archaeology of Māori origin and silent files.
- SASM 025 is nga wai, relating to the tributaries of the Rakahuri River.

700. There are a number of listed trees and historic sites.

9.1 East West Developments

9.1.1 Matters raised by submitters

701. This area is:

- Currently zoned as rural in the operative district plan;
- Proposed in the PDP as RLZ
- Outside the projected infrastructure boundary, as set out in Map A of the CRPS.
- Does not have an ODP for the site within the operative or Proposed Plan.

702. East West Developments [77.1] oppose the rural zoning adjacent to Parsonage and Eders Roads, and the proposed LLRZ at Woodend, and request that this land is rezoned as MDRZ. Their rezoning request is for the land marked in red below:

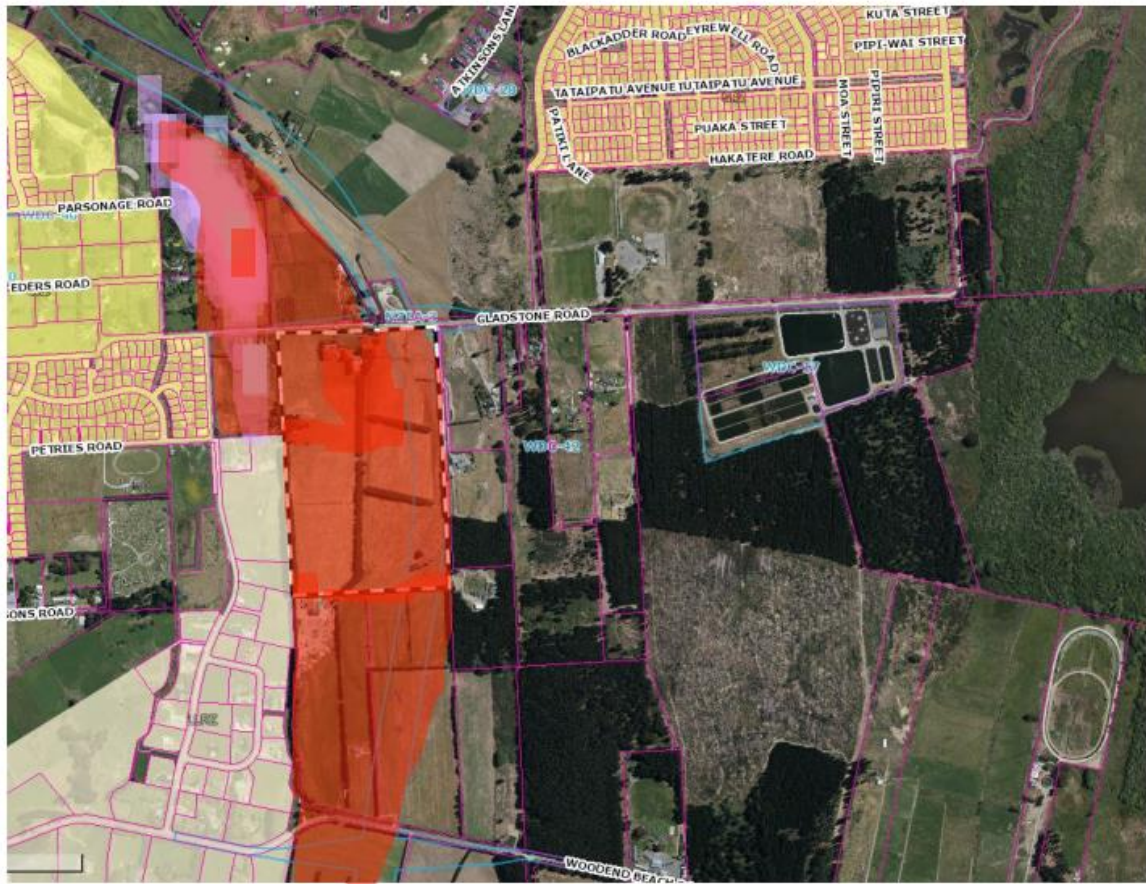


Figure 48 East West Developments Ltd rezoning request (from their submission)

703. This is supported by Ravenswood Developments Ltd [FS 79].

9.1.2 Assessment

704. I did not request specific engineering advice from Council on this application.
705. The submitter has not supplied evidence in support of this application, so I must assess it on the basis of the submission itself. The submitter is not the landowner for most of the shaded area in the submission.
706. The application is outside of existing residential and large lot residential zones, on land currently zoned as rural. I note that some of the area proposed for rezoning is subject to a designation for the proposed Woodend SH1 bypass.
707. I map this area below:

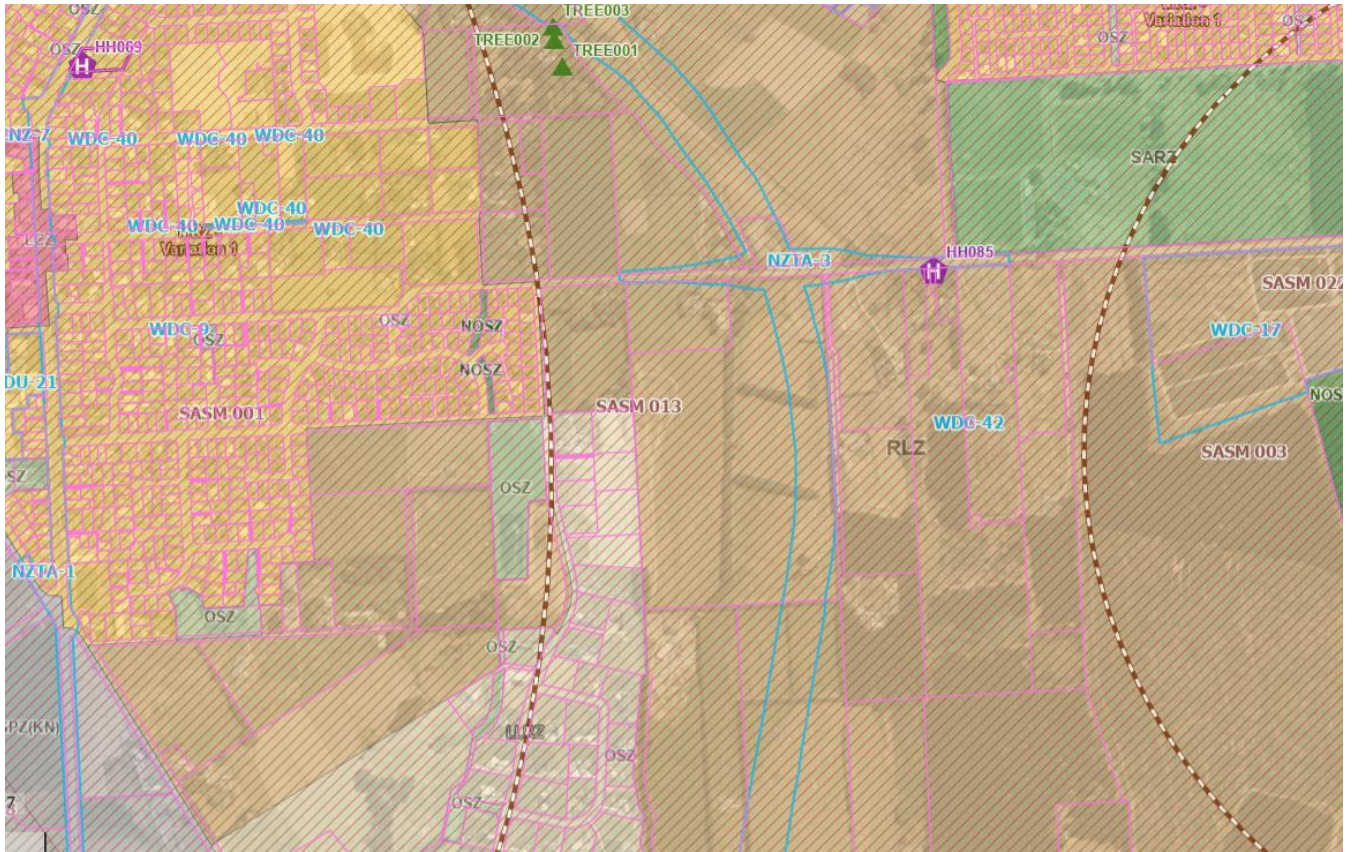


Figure 49 East Woodend

708. My reasons for recommending rejection of the rezoning request are:

- The Woodend bypass is not yet constructed, and until the noise (including potential vibration) effects of this are known, I consider it unwise to extend a medium density residential zone to the edge of the proposed new road, especially in the absence of an ODP.
- The area is outside of Map A, CRPS and the projected infrastructure boundary. Whilst it could be considered under the NPSUD, in the absence of an ODP and firmer evidence on capacity, I cannot undertake an NPSUD assessment without this information. It is not part of what I consider to be the anticipated urban environment, and so this information would be required for me to make the assessment on the responsive planning provisions.
- I would then need to engage with the relevant provisions of the CPRS, under policy interpretation approach 2.

709. I note that Mr Buckley has recommended declining similar rezoning requests adjacent to the proposed Woodend bypass, in section 5.12 of his s42A report on hearing stream 12C (LLRZ).

710. When firm plans and funding exists for the construction of the bypass, I consider that there could be an opportunity and need to investigate and plan for future land use between the bypass route and existing residential zones. Council would also be required to be responsive to any similar resource consent application.

9.1.3 Recommendations

711. I recommend the following outcome for submissions:

- That East West Developments [77.1] is **rejected**
- That further submission Ravenswood Developments Ltd [FS 79] is **rejected**

9.1.4 Plan-enabled capacity arising from this recommendation

712. As I consider I lack evidence on the exact nature of this rezoning, I have not assessed it for capacity purposes at this time.

9.1.5 Amendments

713. There are no changes to the Proposed Plan arising from recommendations in this section.

9.2 Chinnerys Road

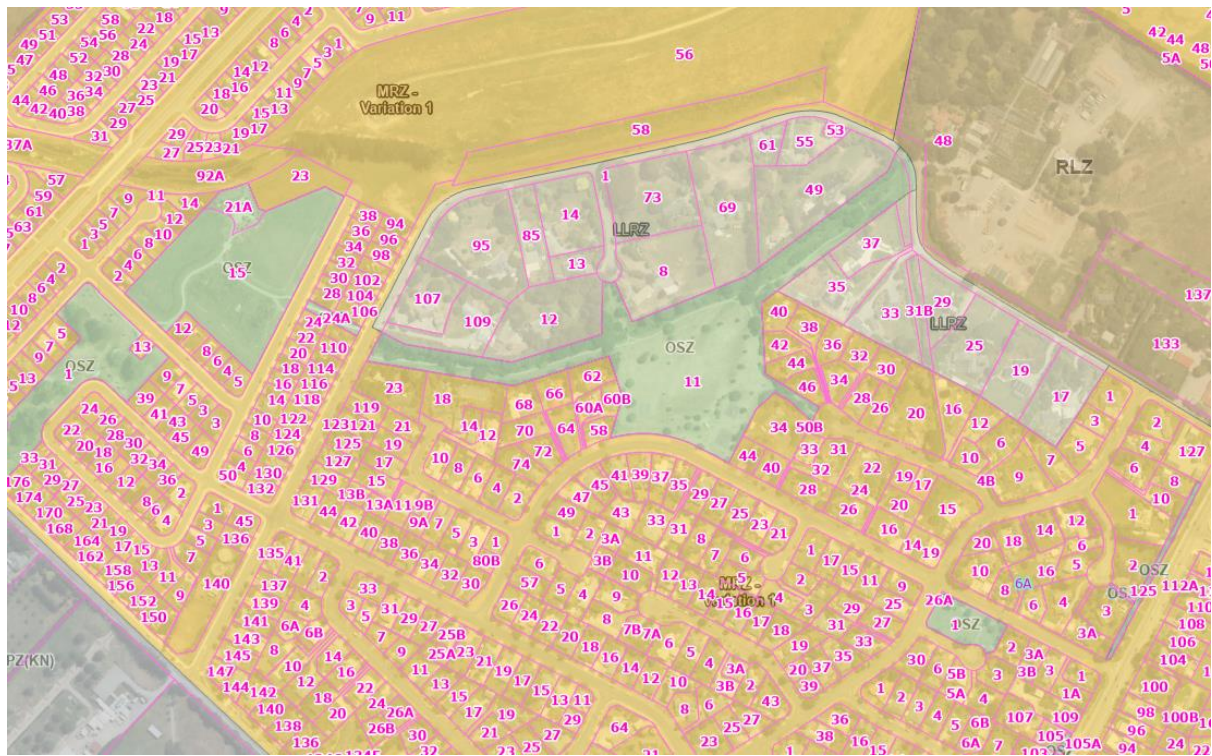


Figure 50 Chinnerys Road area (LLRZ in grey)

9.2.1 Matters raised by submitters

714. This area (about 9ha) is:

- Currently zoned as residential 4b (rural-residential) in the operative district plan;
- Proposed in the PDP as LLRZ
- Inside the projected infrastructure boundary, as set out in Map A of the CRPS.
- Does not have an ODP for the site within the operative or Proposed Plan.

715. Mark and Debbie Ogle [143.1] oppose the LLRZ for Chinnerys Road and Grange View and would prefer it is rezoned to GRZ.

716. She supports herself in a further submission [FS 94].

717. Anne Fechney et al [125.1] (7 other landowners) request to rezone Chinnerys Road and Grange View area from Residential 4B in the Operative District Plan, and Large Lot Residential Zone (LLRZ) (with a General Residential Zone (GRZ) Overlay in the Proposed Plan) to GRZ. They consider that LLRZ is not appropriate as LLRZ is 'rural-residential development in a rural environment.', 'located near but outside the established townships.', and provides 'residential living in a rural environment'. However the area is now sandwiched between Ravenswood and Woodend and is no longer rural setting. LLRZ is 'an environment with generally low levels of noise, traffic, outdoor lighting, odour and dust'. However, newly built properties and streetlights in Ravenswood have impacted rural environment. The average lot size in LLRZ is 5000m², however the average size of submitter's properties (17-107 Chinnerys Road + Grange View) is 4490.8m², and other large lots in Woodend are GRZ. Rezoning would enable new homes to be built, supporting increase in population and providing greater mix of housing choices under the Waimakariri 2048 District Development Strategy.

718. The other people on this submission and their addresses are as follows:

- Mr & Mrs C Sharp - 109 Chinnerys Road,
- Mr & Mrs M Ogle - 95 Chinnerys Road,
- Mr & Mrs H Tocker - 85 Chinnerys Road,
- Mr & Mrs G Fechney – 14 Grange View,
- Mr K & Ms Lucy Magill - 13 Grange View,
- Mr & Mrs K Robinson - 8 Grange View,
- Mr & Mrs G Barclay - 73 Chinnerys Road

719. This is supported in a further submission by FS Ravenswood Developments Ltd [FS 79].

9.2.2 Assessment

720. Council summary advice is as follows:

Geotechnical, Natural hazards, 3 waters

721. Mr Aramowicz comments:

- *No geotechnical information was provided by the applicant, but I expect the area to have a moderate risk of liquefaction. For instance, the geotechnical report for the Ravenswood development to the north (TRIM240426066047) indicates the land has a mod risk of liquefaction (ie TC2-like) and the land in close proximity to the large stream (further north of the application site) has a risk of major lateral stretch. The risk of lateral spreading/stretch occurring to the small channel that cross the application site is unknown. The T&T data for the nearby Ravenswood area indicates there was no shallow peat present but the shallow soils are soft and plastic. There will be geotechnical mitigation measures that can be provided at time of construction to eliminate/reduce the risk of spreading (if this risk exists). The geotechnical requirements for future subdivision of the site can be addressed as a condition of subdivision consent.*
- *Providing areas subject to a medium flood hazard are not developed, and any areas at high risk of subsidence/liquefaction are remediated as a condition of subdivision*

engineering approval, the remainder of the site is unlikely to be subject to significant hazards and can be suitable for the proposed LLRZ. In summary, there are no known significant natural hazards of other geotechnical matters that would prevent the proposed land use.

- *The Applicant will need to provide an ODP with an SMA located at the lower east part of the site, discharging to the old Taranaki stream channel.*
- *In summary, providing a future ODP addresses the need for onsite treatment and effective attenuation to avoid adverse effects on the downstream environment, then I consider there are no known significant stormwater constraints that would prevent the proposed land use.*
- *There is sufficient capacity within existing network, but existing services are likely to need to be realigned to suit a future development - at the Developer's cost.*
- *In summary, there are no known significant wastewater constraints that would prevent the proposed land use.*
- *The WDC 50yr growth model (TRIM231206196571) identifies upgrades needed to service Chinnerys Rd in the year 2047, and notes the existing services that cross private property are likely to need to be realigned to suit a future development - at the Developer's cost.*
- *In summary, there are no known significant water supply constraints that would prevent the proposed land use.*

Transport:

722. Mr Binder comments:

- *Given the intensification on all sides, I would generally support this location being included as GRZ.*
- *I note that Chinnerys Road will likely require road reserve widening and substantial urbanisation – footpaths, widening, kerb/channel, lighting, street trees – and this may be better organised on an area-wide basis rather than per section as each develops.*
- *I note that based on existing background traffic volumes on Chinnerys Road that the intersections with Rangiora-Woodend Rd and Main North Rd may require improvements in the future, and additional traffic from this area is likely to accelerate these improvements. However, this is not in and of itself a reason to decline this submission.*

Greenspace:

723. Mr Read comments:

- *In isolation, this submission proposal does not trigger a requirement for any additional public park space if rezoned as General Residential. A large area of neighbourhood park open space is available within the neighbouring Grange View Reserve. This park is easily accessed by any of the three entry/exit points that bisect and surround the current subject sites. In addition, the stream esplanade walkways located directly across Chinnerys Rd will be readily accessible once this stage of the Ravenswood development is completed.*

- *If the rezoning goes ahead, the retention of any notable or high value landscape trees is advocated to help retain valuable landscape amenity where practicable. This would also benefit the adjacent park setting.*

Urban design:

724. Mr Jolly has made design recommendations in response to submissions and advice from Council experts. These designs are provided below in his updated ODP recommendations.

Cultural advice

725. I note that area 5 – Woodend sites are not considered to create adverse effects on Runanga, however Runanga advice at subdivision consent stage would still be required.

Discussion

726. This area is currently zoned as residential 4b (rural residential), but is now sandwiched by the Ravenswood medium density residential development to the north, and general residential (proposed to be medium density residential under variation 1) on the other sides. It is within the projected infrastructure boundary and existing shaded urban areas of Map A, CRPS.

727. There are about 21 lots of between 0.4ha and 0.8ha in the area. 10 of these landowners seek rezoning.

728. The applicants have not provided expert evidence seeking rezoning, however I note that as with other areas under an anticipated zoning overlay that I consider that the evidential test to be less, as a certain upzoning can be anticipated.

729. The site has the following flood hazards:



Figure 51 Chinnerys Road flood hazard



Figure 52 Chinnery Road flood depths (localised flooding) m

730. I note that Mr Aramowicz considers that areas with a medium flood hazard should not be developed. I note only small areas of medium flood hazard in the area, mostly associated with existing drains or waterways, and in these areas, the modelled water depth in a 1 in 200 localised flood is between 0.25m and 0.75m. The all flooding scenario mapping for the same return period (which includes breakout scenarios and any coastal flooding) is a similar depth.
731. In the context of the small areas of medium flood hazard on this site, and the larger areas of medium flood hazard, particularly in the Rangiora development areas, that I have recommended rezoning on, I do not consider that this risk is sufficient to justify any site specific rules over and above the plan's requirements for a finished floor level of 400mm in medium flood risk areas.
732. I note the requirement for a stormwater management area in the "lower east" part of the site, discharging into the stream channel. This part of the site is the area at the most risk of flooding, because it is low-lying, and therefore, suited for a stormwater management area.
733. I will outline the potential for areas of soft ground that could create liquefaction risk in the ODP narrative, to ensure that this is addressed at subdivision stage.
734. Mr Read has requested that existing trees are retained and integrated into the development wherever possible.
735. I have asked Mr Jolly to provide an ODP with these matters addressed, with ODP recommendations as below:



Figure 53 Recommended ODP for Chinnerys Road

736. I assess scope for the rezoning below:

Submitter	Number	Land Included in submission	Zoning sought
Mark and Debbie Ogle	143.1	Chinnerys Road and Grange View	Prefer rezoned to GRZ
Anne Fechny et al request to rezone Mr & Mrs C Sharp - 109 Chinnerys Road, Mr & Mrs M Ogle - 95 Chinnerys Road, Mr & Mrs H Tocker - 85 Chinnerys Road, Mr & Mrs G Fechny - 14 Grange View,	125.1 (7 other landowners)	Chinnerys Road and Grange View area	From Residential 4B in the Operative District Plan, and Large Lot Residential Zone (LLRZ) (with a General Residential Zone (GRZ) Overlay in the Proposed Plan) to GRZ.

Mr K & Ms Lucy Magill - 13 Grange View, Mr & Mrs K Robinson - 8 Grange View, Mr & Mrs G Barclay - 73 Chinnerys Road			
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737. I consider that submissions and the GRZ overlay provide scope to consider general residential zoning for this land as a rezoning option.
738. General residential provides for a 500m² allotment size, which is substantially smaller than the current lot size, however, it is still larger than the surrounding allotment sizes, which are approaching medium density noting that most of these have not developed to their full potential. Variation 1 also further increases the intensity of development surrounding this site.
739. Whilst I do not consider I have scope to recommend it rezoned to PDP medium density residential, I note that this may later occur under plan changes, or densities to that effect occur through consenting decisions.
740. I recommend that the planning maps for the area are changed to rezone it as general residential, with the following additions or changes:
- An ODP inserted into the plan as per Mr Jolly's recommendations, as a new existing development area entitled Chinnerys and Grange Road development area. The final nature of the ODP in respect of principal roads could be determined through the Right of Reply.
 - A provision to ensure protection and retention of existing mature trees in any new development.

9.2.3 Recommendations

741. That the following outcome for submissions occurs:
- Mark and Debbie Ogle [143.1], Anne Fechny et al [125.1] are **accepted**
 - Further submissions FS Ravenswood Developments Ltd [FS 79], FS Mark and Debbie Ogle [FS 94] is **accepted**

9.2.4 Plan-enabled capacity arising from this recommendation

742. I consider the following plan enabled capacity arising from these recommendations:
- I consider this to be an anticipated urban environment, as it is under a general residential overlay as notified in the PDP.
 - There is about 9 ha of land in the Chinnerys and Grange View Road area. I would expect that reserve requirements on this land are between 20%-30%, based off Mr Jolly's proposed ODP, and the 18%-25% range for roading reserves. I have assessed a requirement of 20% reserves for this site, noting that most of the roading is already in place.

- As the site is recommended for general residential, I assess a scenario of 800m² as a lower bound, and 500m² as an upper bound.
- This results in a plan-enabled capacity of 90 at 800m², of 117 at a full MDRS scenario of 500m², and 117 as an average scenario.

9.2.5 Amendments

743. There are no changes to the Proposed Plan arising from recommendations in this section.

9.3 CSI submission

9.3.1 Matters raised by submitter

744. These sites are:

- Currently zoned as rural in the operative district plan;
- Proposed in the PDP as RLZ;
- Outside the projected infrastructure boundary, as set out in Map A of the CRPS; and,
- Do not have an ODP for the site within the operative or Proposed Plan.

745. CSI Property Ltd [212.2] oppose Rural Lifestyle and Large Lot Residential zoning of 1271, 1273, 1275, 1277, 1279, 1319, 1355, 1369 Main North Road and Part 1323 Main North Road 5, 99 and 169 Wards Road, 109, 117, 121, 145 and 319 Gressons Road, Parts of 150 Gressons Road (South of Gressons Road) and 209 Gressons Road (the part to the South East of Gressons Road). They request to rezone to general Residential Zone with some commercial zoning as required to service that area.

9.3.2 Assessment

746. I understand these properties are in the following areas:



Figure 54 1271-1279 Main North Road



Figure 55 1319-1369 Main North Road

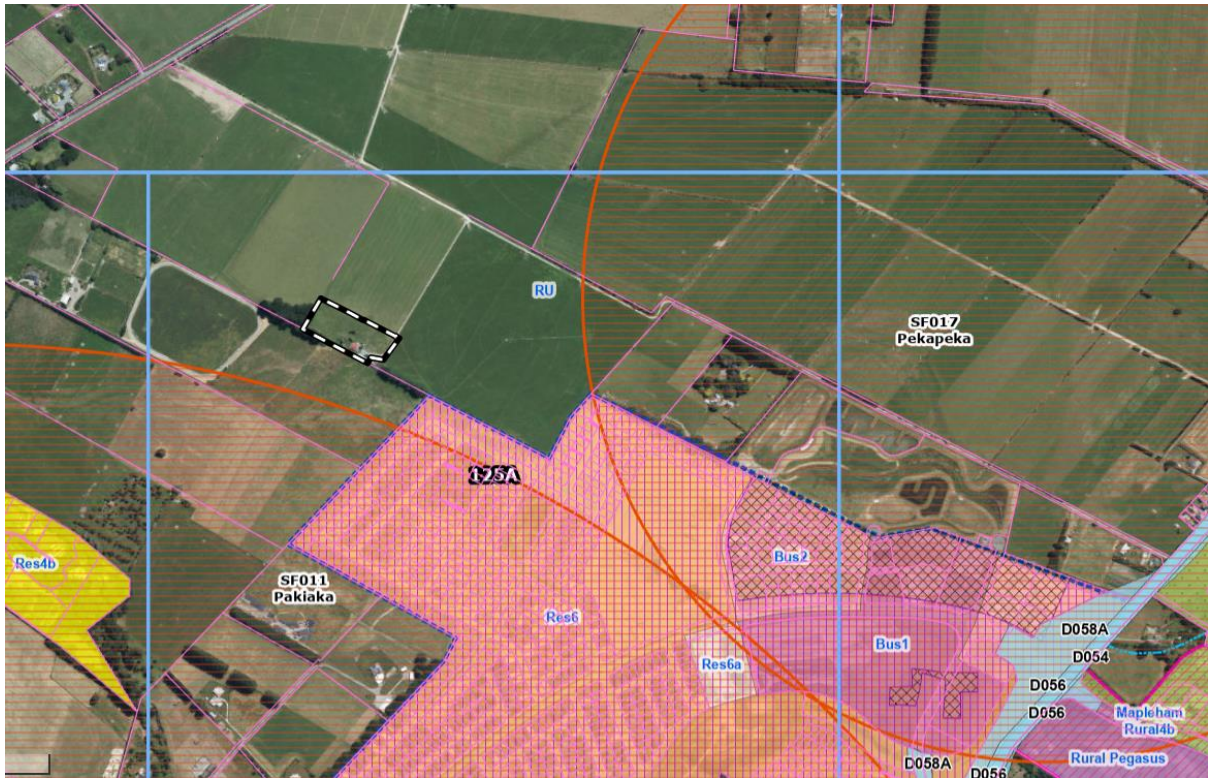


Figure 56 5-169 Wards Road

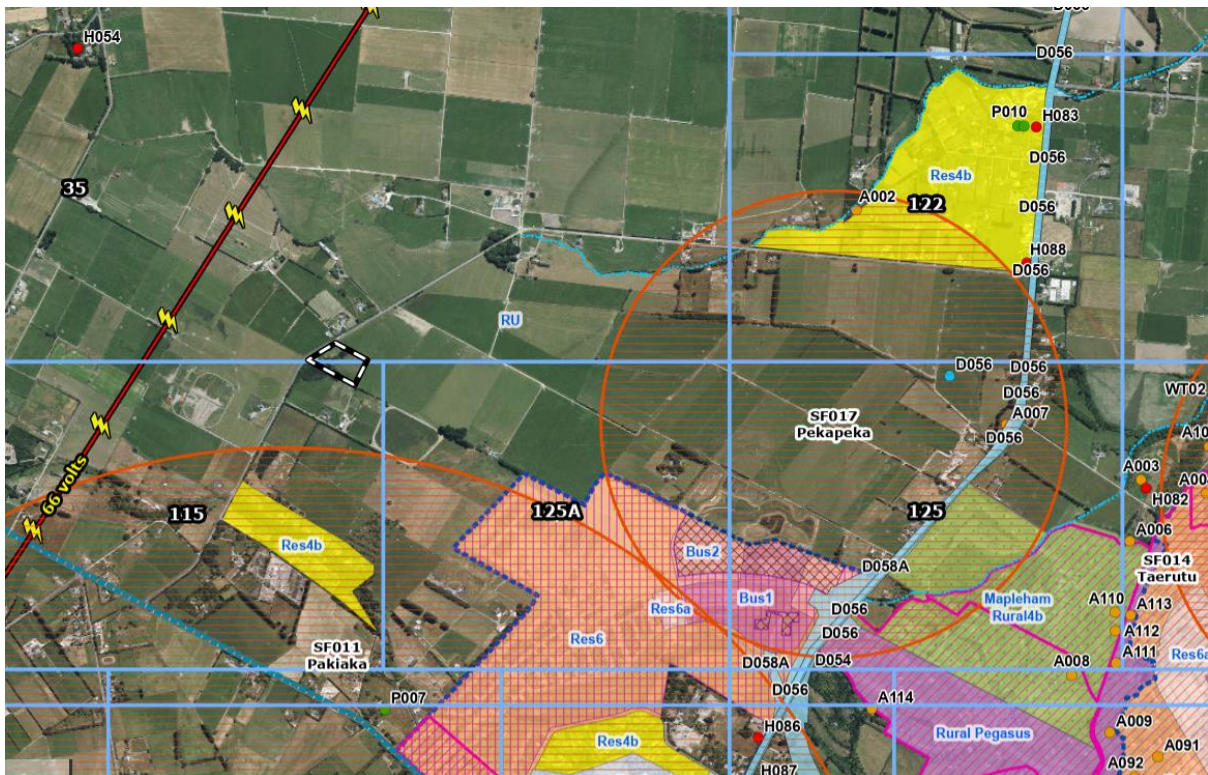


Figure 57 Gressons Road properties

747. The properties appear to be a mixture of smaller parcels within the operative rural zone, and larger rural parcels. Some of the parcels that the submitter proposes for rezoning are also

subject to other rezoning requests, particularly in Gressons Road, Waikuku, and north of Ravenswood.

748. The submitter has not provided any information outlining why they seek these properties to be rezoned, and I also note that the submitter is not the owner of any of these properties.
749. I also note my recommendation on the other part of the CSI submission above against spot zoning, which would be required to give effect to the more limited scope from this submission
750. Mr Buckley has made recommendations in respect of rezoning requests at Waikuku on the same areas as these submissions, and also in response to another CSI submission. I will make recommendations in relation to the Stokes proposal north of Ravenswood below.
751. I recommend that this submission is rejected.

9.3.3 Recommendations

752. That the following outcome for submissions occurs:
- That CSI Property Ltd [212.2] is **rejected**

9.3.4 Plan-enabled capacity arising from this recommendation

753. I consider that I lack sufficient information on the nature of this rezoning proposal to be able to provide a capacity assessment at this time.

9.3.5 Amendments

754. No amendments arise from these recommendations.

9.4 Woodwater proposal

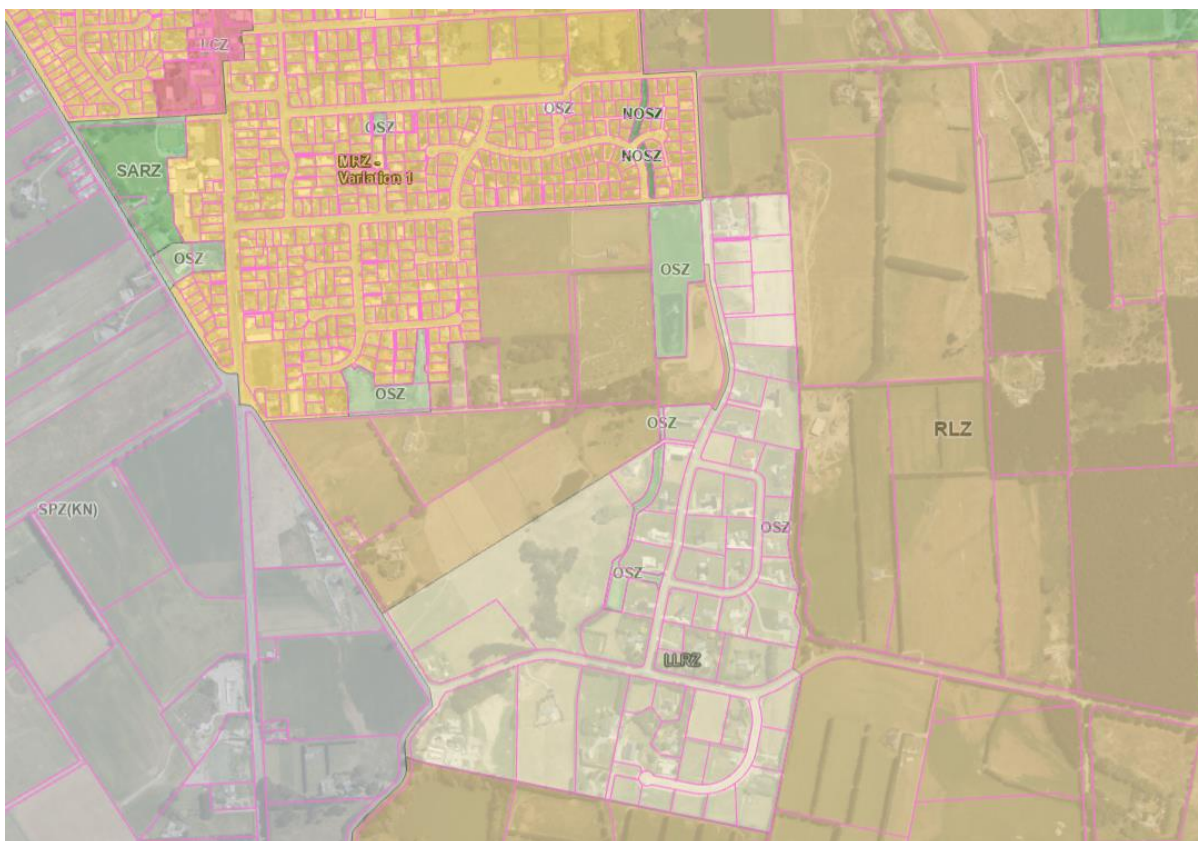


Figure 58 Woodwater area

755. These sites are:
- Currently zoned as rural in the operative district plan;
 - Proposed in the PDP as RLZ
 - Inside the projected infrastructure boundary, as set out in Map A of the CRPS.
 - The land is not designated as either a greenfields priority area or future development area in Map A, CRPS
 - Do not have an ODP in the operative or Proposed Plan
756. Woodwater Limited [215.1] request to rezone land on Judsons Road, Woodend Beach Road, Copper Beech Road and Petries Road, Woodend (refer to full submission for list of properties) from Rural Lifestyle Zone (RLZ) to residential uses. This land will [otherwise] be an island of rural land surrounded by urban land. The following parcels are requested to be rezoned:
- 21 Judsons Road, Woodend, Waimakariri District (Lot 2 Deposited Plan 2567 and Part Rural Section 689)
 - 320 Woodend Beach Road, Woodend, Waimakariri District (Lot 2 Deposited Plan 75359)
 - 1 Judsons Road, Woodend, Waimakariri District (Part Lot 1 Deposited Plan 2567)

- 328 Woodend Beach Road, Woodend, Waimakariri District (Part Lot 1 Deposited Plan 2567)
- 36 Judsons Road, Woodend, Waimakariri District (Part Rural Land 689 and Part Rural Land 689)
- 40 Judsons Road, Woodend, Waimakariri District (Part Rural Section 689)
- 46 Judsons Road, Woodend, Waimakariri District (Part Rural Section 689)
- 50 Judsons Road, Woodend, Waimakariri District (Part Rural Section 689)
- 52 Judsons Road, Woodend, Waimakariri District (Part Rural Section 689, Part Rural Section 689, Part Rural Section 367A and Part Rural Section 689)
- 60 Judsons Road, Woodend, Waimakariri District (Parcel ID: 3401266)
- 62 Judsons Road, Woodend, Waimakariri District (Part Rural Section 689)
- Copper Beech Road, Woodend, Waimakariri District (Lot 1, 101 Deposited Plan 503969)
- 43 Petries Road, Woodend, Waimakariri District (Part Rural Section 367A and Part Rural Section 689)

757. This is supported in a further submission by FS Perforated Sheet Specialists Limited [FS 1].

758. Cheryl Anne Judson [217.1] requests to rezone 1 Judson Road (4ha) and 328 Woodend Beach Road (2,428m²) from RLZ to GRZ. In the alternative, she requests a moratorium on the proposed plan zoning of RLZ for up to 5 years to provide some certainty on the future.

9.4.1 Assessment

Geotechnical, Natural hazards, 3 waters

759. Mr Aramowicz comments:

- *There are areas of low-med flood hazard predominantly along eastern and south eastern boundaries of the application area.*
- *The ENGEO(consultant) report indicates there is a moderate risk of liquefaction ie TC2.*
- *The report briefly indicates there could be peat present, but provides no further comment on this potential hazard. I was unable to find the appendices of the geotechnical report in TRIM.*
- *From my experience, I am not aware of peat being prevalent in the south part of Woodend. Given that ENGEO have not commented further on peat, it is assumed that their site investigations did not encounter any extensive or thick deposits that could make it impossible for the proposed GRZ landuse.*
- *In summary, there are no known significant natural hazard or geotechnical matters that would prevent the proposed land use.*
- *Upgrades to network will be needed to achieve adequate supply to the site. The provisions of the LTP may need to be brought forward to allow for early development of this site.*

- *In summary, there are no known significant water supply constraints that would prevent the proposed land use.*

Transport:

760. Mr Binder comments:

- *I consider this area to be appropriate for GRZ given the potential for connections to the existing transport connections. I am not sure that it would be sufficiently well connected for MDRZ intensification based on the following constraints (unless they are remedied)-*
- *Judsons Rd, the only existing road servicing the bulk of the site, has a legal width far below District Plan requirements (10m) and is not sufficiently wide to provide appropriate access for substantial development.*
- *Judsons Rd also accesses only to Woodend Beach Rd, which has capacity constraints at the existing intersection with Main North Rd*
- *There are very limited non-motorised connections (none on Judsons Rd and only far side footpath on Petries Rd) with the broader network (and existing PT stops and cycle facilities)*
- *If further development is to be allowed in this area, I strongly recommend creation of an ODP including further connections from Judsons Rd to Petries Rd and Copper Beech Rd as well as consideration of widening of the Judsons Rd legal road width.*

Greenspace:

761. Mr Read comments:

- *The provision of one or two neighbourhood park spaces will be required if this large area is rezoned and developed for General Residential living; with a portion potentially being rezoned as Large Lot Residential land. The number and location of these parks will need to meet required park levels of service standards. i.e. most residents to be within 500m, or a 10-minute walk, of a neighbourhood park; and 1.0ha of neighbourhood park space to be provided per 1,000 residents. In addition, the minimum size for a neighbourhood park is 0.3ha. Depending on the intensity of development and associated population, meeting this provision could require either one centrally located large park, or two smaller parks distributed for easy community access across the development. The priority location for parks is within medium density and general residential areas, with any large lot residential living being closer to the margins of accessibility if necessary.*
- *The nearby Council owned Panckhurst Reserve caters for existing residents in the area north of Judsons Road. It has no capacity to absorb new residential development.*
- *A green linkage network is required to provide adequate off-road connectivity within the proposed rezoning areas. Restoration of the McIntosh Stream corridor is a key element. It will help facilitate community development, recreational opportunities and environmental enhancement. The denuded wetland sites should be retained in the interim until further ecological assessments are made regarding their values.*

Cultural advice

762. I note that area 5 – Woodend sites are not considered to create adverse effects on Runanga, however Runanga advice at subdivision consent stage would still be required.

Urban design:

763. Mr Jolly comments:

- *One of the key features that runs through the site is a water course / McIntosh Stream and associated wetlands which requires restoration. From the proposed ODP drawings and aerial photography it is difficult to ascertain the exact location of the wetlands. The ODP proposes residential zoning in this area. It is recommended that this water course is enhanced and reinforced with further stormwater management area. See diagram below (figure 2) on how land can be attributed to enhancement of Stormwater and the stream environment such that the stream environment both ecologically and for recreation purposes can be enhanced within this ODP site. Stream margins will require protective setbacks as well.*
- *The proposals provide very little in the way of public open space reserve. Medium density residential development will require higher demand on public open space and reserves therefore it is recommended to provide a centrally located large reserve with the site which will become a community focus and opportunity for passive recreation and play within the new neighbourhood. The alternative layout (figure 2) identifies a potential location for the reserve that will service new residential development within the ODP site. Its central location and size (approximately 1.5ha) allows it to provide access for the whole ODP site as it is within a 500m / 10minute walking distance from the majority of future homes. An alternative would be two smaller 0.75ha reserves, one located centrally in the northern area and one in the southern.*
- *The proposed ODP identifies 'primary roads' however in reality these should be secondary roads with Woodend Beach Road and Petries Road being the two primary roads in the area. The ODP identifies minimal secondary and local road connectivity within the ODP. It is recommended that further roads and means of connectivity are established. The diagram opposite (figure 2) provides a solution for road layout and connectivity within the site and connectivity back to the primary network. Consideration should also be given to how land is accessed and connectivity established into the site directly south of the ODP and north of Woodend Beach Road in the future.*

Applicants

<u>Person/Organisation</u>	<u>Evidence type</u>
Davie Lovell Smith	Infrastructure and Servicing
ENGEO	Geotechnical and preliminary site investigation
Abley	South East Woodend Rezoning Integrated Transport Assessment
Insight Economics	Economics
DCM Urban Design Limited	Urban Design
Aquatic Ecology	Ecology

Discussion

764. This is a pocket of land largely surrounded by Woodend township to the north, the Copper Beach large lot development to the east and south, and Main North Road to the west. The area is currently zoned as rural, and proposed to be zoned as rural lifestyle. Whilst it is within the

proposed infrastructure boundary of Map A, CRPS, it is something of an anomaly, not an existing residential zone, a greenfield priority area, or a future urban development area.

765. I consider that it was likely left out of the various Map A revisions due to transport issues, with the primary current access being Judsons Road, which is both too narrow for increased traffic volumes, and exits onto Woodend Beach Road south of Woodend, which is increasingly congested at its intersection with Main North Road, especially at peak times.
766. However, the proposal can be considered under Objective 6 and Policy 8 NPSUD, if it provides significant development capacity and contributes to well-functioning urban environments. I am conscious that unlike Rangiora and Kaiapoi, Woodend does not contain a future development area, having a number of existing development areas. However, I consider that if future capacity was to be provided for Woodend, this location would be preferable being within the infrastructure boundary.
767. I note that the Waimakariri District Development Strategy¹⁰⁰ identifies a direction for growth of the town south east into this area, and also noting that it is within the projected infrastructure boundary. The north and north-west directions of growth are not within the projected infrastructure boundary:

¹⁰⁰ Pg 43, Waimakariri District Development Strategy,
https://www.waimakariri.govt.nz/__data/assets/pdf_file/0018/132822/180525057771-District-Development-Strategy-DDS-2018-FINAL-Web.pdf



Figure 59 WDDS, Woodend (pg43)

768. The Council engineering advice does not identify any significant issues with the site, other than the requirement to upgrade services by potentially bringing forward planned LTP upgrades.
769. I note that the stormwater provision is on a parcel of land outside of the rezoning proposal, at 300 Woodend Beach Road. This land is currently zoned as large-lot residential. The submitter, and/or developer would need to have arrangements in place for stormwater provision on this land outside of any rezoning that occurs under this process.
770. The primary restriction on the site are the limitations on the existing roading network, and this is acknowledged by both the applicant's and Council's experts. I note the following statements within the Abley report¹⁰¹ that outlines these limitations:
- There should be no roading connection from the site onto Woodend Beach Road prior to the upgrading of one of the Woodend Beach Road/SH1 intersections or construction of the Woodend Bypass.

¹⁰¹ Pg 30, https://www.waimakariri.govt.nz/__data/assets/pdf_file/0028/160768/Southeast-Woodend-Plan-Change-Integrated-Transport-Assessment-final.pdf

- Any subdivision application that involves a roading connection from the site onto Petries Road requires widening of the Petries Road corridor to 20m, and urbanising Petries Road across the site frontage
- No more than 170 lots can be established connecting to Petries Road, until such time as the Woodend Bypass is constructed or the SH 1/Petries Road intersection is upgraded to the satisfaction of NZTA.
- Any subdivision that involves a roading connection onto the northern-most section Woodend Beach road requires urbanising Woodend Beach Road across the site frontage.
- Any subdivision application that involves a connection to Judsons Road requires that Judsons Road / Woodend Beach Road intersection to be relocated south, in general accordance with the ODP and widening Judsons Road to 20m, and urbanising it.

771. I also note the requests from Mr Read to confirm the location and sizing of the identified park, potentially provide an additional park in the south east of the area, provide for blue green linkages which could align with the restoration of the McIntosh Drain/Stream corridor.

772. Mr Jolly has made design recommendations on these accordingly, and has supplied an updated ODP as follows:

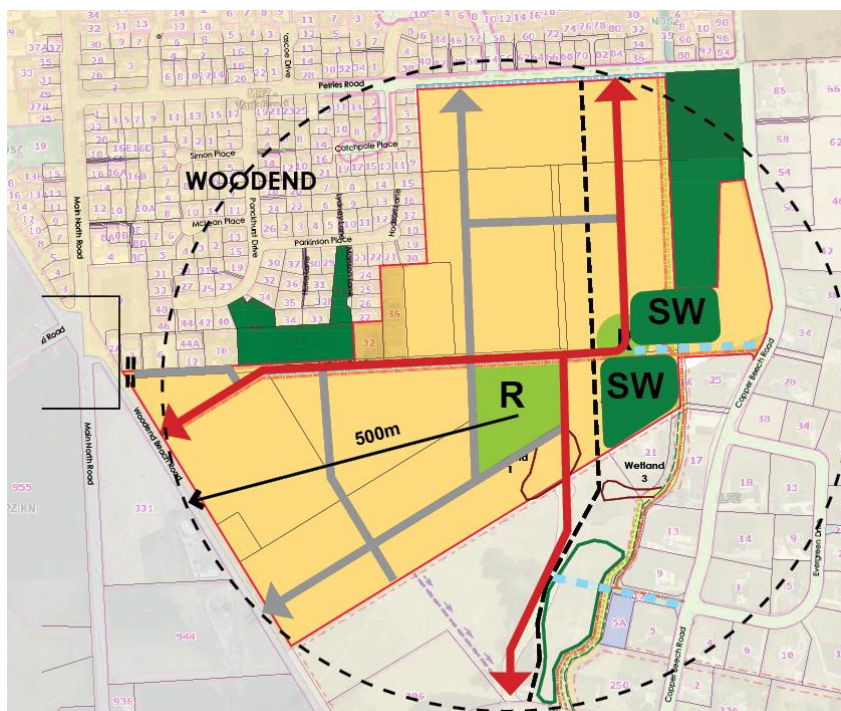


Figure 60 Recommended changes to Woodwater ODP

Yield

773. I note that the Insight Economics report¹⁰² states the following for yield considerations:

¹⁰² Section 4.4, Insight Economics, EIC

- A net developable area of just over 32 hectares. However, my assessments show this area to be the gross area, rather than the net.
 - Stormwater areas located outside the rezoning area on adjacent land.
 - A theoretical yield of 485 to 550 homes based on achieving 15 households/ha, with an average section size of 500m². The Insight Economics report prefers a net developable area of 485 households per hectare.
774. Mr Thomson uses the midpoint of 500 dwellings¹⁰³, indicating that he asked the experts to base their calculations on a nett [sic] density of 15 households per hectare with a resultant yield of 500 units (calculated by Mr Hall on concept plans).
775. Depending on which calculation of yield is used, these would result in between 20% to 30% of the site for roading and reserves, which I consider to be consistent with most other proposed developments in the District.
776. If medium density residential is applied to the site, and section sizes thus reduced, then the density achieved may be considerably more, potentially up to 700 dwellings, based on an average section size of about 300m².
777. For my calculations, I will assess the midpoint of Mr Thomson's evidence above as a lower bound assessment of yield, as it is stated by the developers' planner, and a potential upper bound under a medium density scenario of 700 dwellings.

Overall consideration

778. The land is outside the shaded areas in Map A, CRPS. As such, I must consider it under the responsive planning provisions in Objective 6 and Policy 8 NPSUD. I consider the following:
- That the Woodwater proposal provides significant development capacity in the form of an additional 500 to 700 households, and contributes to a well-functioning urban environment primarily by infilling a parcel of rural land that is surrounded on the north by residential developments, east and south by large lot residential, and on the west by SH1/Main North Road.
 - It is also responsive in the context of Objective 6 NPSUD to the proposed Woodend bypass, which will free up this portion of Main North Road to receive additional traffic from this site.
779. Defining a well-functioning environment in the context of Policy 8 in turn requires an assessment of the proposal against the CRPS provisions, as I consider that the CRPS already gives effect to the NPSUD under policy interpretation approach 2. I have considered the Sparks Block B and C proposals against the CRPS criteria in 6.3.11(5) as an alteration of a future development area, as I consider this policy to be a useful summary of the CRPS requirements in this regard:
- Infrastructure is in place, or able to be provided economically and efficiently
 - Provision has been made for safe and convenient access to community, social, and commercial facilities.

¹⁰³ Section 6.3, Ivan Thomson, EIC

- Urban consolidation is achieved, and the proposal assists with this, by avoiding an otherwise orphaned parcel of rural land.
- The future urban land use does not contaminate any drinking water sources, including groundwater recharge zones.
- Sufficient rural land is retained to maintain the open space character either between or surrounding the areas of urban activity within Greater Christchurch.
- The operational capacity of strategic infrastructure is not compromised

780. Additional CRPS provisions apply. In particular, I note:

- CRPS policy 6.3.1(1) – give effect to the urban form outlined in Map A, CRPS, when planning for future growth and infrastructure delivery.
- 6.3.5 – integration of land use and infrastructure, particularly 6.3.5(2), coordination of new development areas with future investment in transport infrastructure.

781. In the context of this application, I note that the area has been anticipated to be developed at some stage, however the transport constraints have prevented this from occurring. If development was to occur, I consider it would still be consistent with the urban form identified in Map A, CRPS, and also be responsive to a change in transport infrastructure, if and when the bypass is constructed.

782. I assess scope for the rezoning below:

Submitter	Number	Land Included in submission	Zoning sought
Woodwater Limited	215.1	Rezone land on Judsons Road, Woodend Beach Road, Copper Beech Road and Petries Road, Woodend (refer to full submission for list of properties).	To residential uses
Cheryl Anne Judson	217.1	Rezone 1 Judson Road (4ha) and 328 Woodend Beach Road (2,428m ²).	GRZ. In the alternative, she requests a moratorium on the proposed plan zoning of RLZ for up to 5 years to provide some certainty on the future

783. I consider that submissions and the GRZ overlay provide scope to consider both general residential zoning and PDP medium density zoning.

784. General residential provides for a 500m² allotment size, which is slightly smaller than the surrounding lots to the north, and substantially smaller than the large lot residential to the east (Copper Beach). I note however that new subdivisions would be required to meet the yields of SUB-S3, which states densities of 15 households per hectare are to be achieved, except where constraints limit it to at least 12 hh/ha. PDP medium density residential provides for a minimum lot size of 200m², with up to 12 metres in height (three storeys). I note that the overall recommendations on built form standards will come in the s42A reports for stream 7 for general and medium density residential zones.
785. I consider there is scope from the Woodwater submission above which does not explicitly request a particular zone, and which covers all of the land within the area, to recommend it rezoned to PDP medium density residential. I note that in making this recommendation, it would technically require me to reject Ms Judson's submission, as she has not sought medium density residential, but still wishes to be rezoned.
786. I am minded to recommend that the area is rezoned to PDP medium density residential, through the creation of a new existing development area, entitled South Woodend, subject to the following changes:
- That the ODP provided by submitters is updated to include Mr Jolly's recommendations
 - That the area becomes an existing development area in DEV section of the PDP
 - That a rule is proposed for limiting subdivision until such time as the Woodend bypass is constructed.
 - That the offsite stormwater provision is noted.
787. I note that the development is limited by transport design capacity, which is agreed by both Council and applicant experts. I consider that as roading works must occur before development can begin, in relation to the widening of roads, and that development can proceed only up to 170 allotments until such time as the Woodend bypass is constructed, area specific rules or other conditions to this effect will be required in the PDP.
788. The submitters have not proposed such rules or conditions, however I note that there are a number of possible ways in which these can be placed in the PDP, but the submitters would need to propose it.

9.4.2 Recommendations

789. In addition to the ODP changes if a condition in the PDP requiring widening of roads adjacent to the subdivision and limiting the number of allotments to 170 until such time as the Woodend bypass is constructed *is* provided, I recommend the following outcome for submissions:
- That Cheryl Anne Judson [217.1] is **rejected**
 - That Woodwater [215.1] is **accepted**
790. In addition to the ODP changes if a condition in the PDP requiring widening of roads adjacent to the subdivision and limiting the number of allotments to 170 until such time as the Woodend bypass is constructed *is not* provided, I recommend the following outcome for submissions:
- That Cheryl Anne Judson [217.1], Woodwater [215.1] are **rejected**

791. I note that if approved, it would require the creation of a new existing development area in the PDP.

9.4.3 Plan-enabled capacity arising from this recommendation

792. I consider the following plan enabled capacity arising from these recommendations:

- I consider this to be an unanticipated urban environment, as it is not within the shaded areas of Map A, CRPS.
- There is a gross area of 32ha. I consider that the reserve requirements for the site would fall in a range of between 20%-30%, on the basis of the submitter's supplied ODP, and Mr Jolly's design additions. I assess a 30% reserve requirement.
- Applying a 600m² lower bound allotment size, and a 200m² full MDRS upper bound scenario, this results in a plan-enabled capacity of 373 at 600m², of 1120 at a full MDRS scenario of 500m², and 747 as an average scenario.
- Whilst I note the submitters statements of achieving 485-550 homes, I did consider above that this is was on the low side.

9.4.4 Amendments

793. That the PDP is amended as follows:

- That the planning maps for the area are changed to include PDP medium density residential zoning for the Woodwater area.
- That the ODP provided by submitters is updated to include Mr Jolly's recommendations
- That the area becomes an existing development area in DEV section of the PDP
- That a rule is proposed for limiting subdivision until such time as the Woodend bypass is constructed.
- That the offsite stormwater provision is noted.

798. For general landowners, the SPZ(KN) applies the rural lifestyle provisions, for Māori landowners¹⁰⁴, the land is treated as if it were residential, with no minimum allotment size.
799. I do not recommend rezoning this site.

9.5.3 Recommendations

800. That the following outcome for submissions occurs:

- That Marie Bax [216.1] is **rejected**
- That further submissions FS Marie Bax [FS 93] is **rejected**

9.5.4 Plan-enabled capacity arising from this recommendation

801. I have not assessed a plan-enabled capacity for this recommendation.

9.5.5 Amendments

802. No amendments are proposed arising from this submission

¹⁰⁴ The PDP has a particular definition of Māori land in the context of the SPZ(KN)

10 Rezoning requests in and around Pegasus

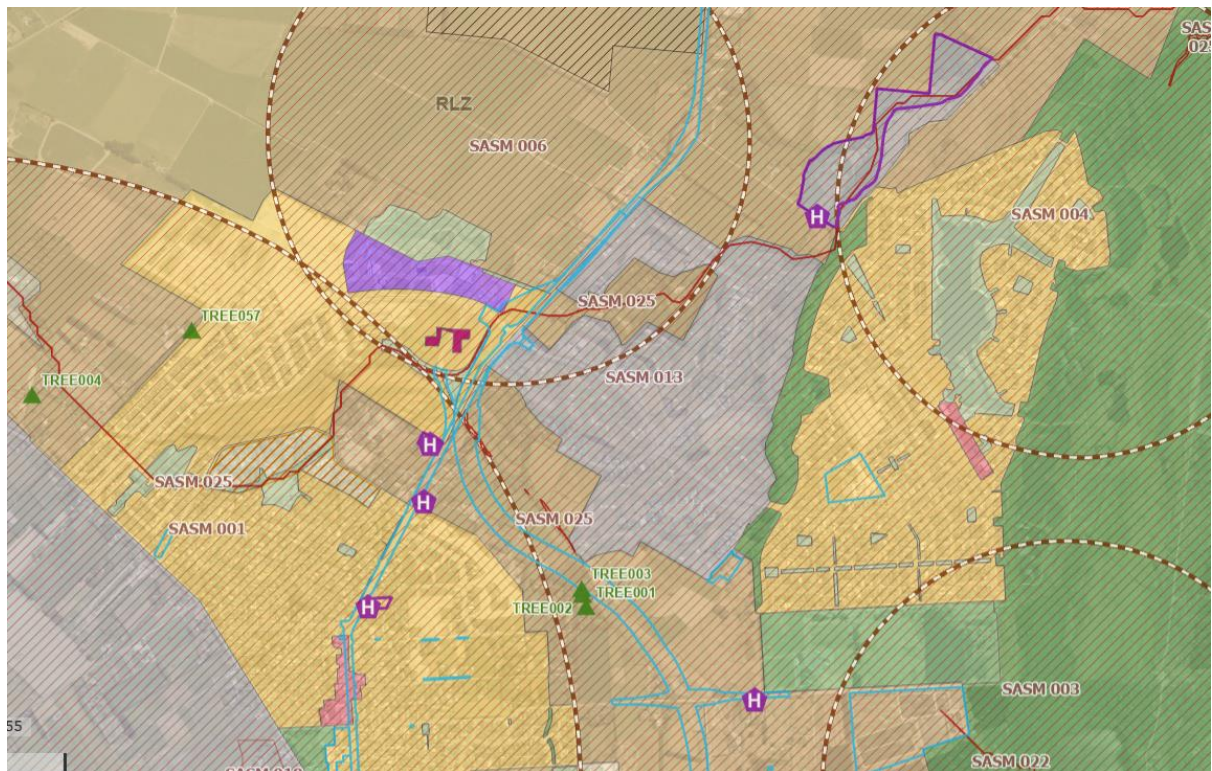


Figure 62 Cultural and heritage aspects North Woodend and Pegasus

803. Pegasus is covered by the following SASM:

- SASM 003 – Wahi tapu – silent file
- SASM 004 – Wahi tapu – silent file
- SASM 013 – Nga turanga tupuna - Cultural Landscape encompassing an area of high coastal settlement (in both contemporary and ancestral senses). It comprises significant clusters of recorded archaeology of Māori origin and silent files
- SASM 025 – Nga wai -
River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species

10.1.1 Matters raised by submitters

804. Jan De Lange [91.1] requests to rezone 70 and 74 Mapleham Drive, Pegasus, from RLZ to GRZ or MDRZ.

805. Rhonda Mather [95.1, 95.2] considers that the proposed zoning (MDRZ) of 64,66, and 70 Pegasus Main Street as MDRZ is not considered appropriate, as the areas host major community events and no other suitably large and located sites remain. She considers that a rezoning of MDRZ would allow high density (3 storey) residential development in an area prized for openness and lake views, and destroy the atmosphere and expectation of a semi-rural township and restrict lake access for the community. Pegasus already has sufficient small sized sections and existing MRZ. She states the following:

- Council needs to enable zoning for Pegasus to have a community hub and heart, where people from throughout the Waimakariri and beyond want to spend time in Pegasus and patronise its businesses.
- Leaving the zoning as MRZ would be inappropriate with an ugly obstructive and uninviting block of multi-story residences. 64 Pegasus Main St is inappropriate for an MRZ zoning given that it adjoins to The Good Home gastropub and on an awkward shaped section immediately adjacent to the Lake, a carpark and playground (and public toilets). Rezone the areas of 64, 66 and 70 Pegasus Main St to enable a mixture of activities such as retail, community facilities and open space (sporting and other community events), plus some type of accommodation facility (such as a motel).

806. This is opposed in further submission from FS Templeton Group [FS 81].

807. The Woodend-Sefton Community Board [155.10] also oppose the medium density zoning of 64,66, and 70 Pegasus Main Street(from Bob's Bridge to existing commercial area) and suggest an esplanade reserve or strip or an open space zone to be put in place around the Pegasus Lake to maintain public access. They state the following:

- The proposed new community centre and youth space needs to be allowed for.
- The Council's decision to decline the rezoning of approximately 12.8ha as Business 1 (Town Centre zone) within Ravenswood and the loss of business zoned land at Pegasus through rezoning to residential has meant that the Woodend/Pegasus/Waikuku area does not have a Town Centre which is capable of servicing the retail needs of the growing area. Seek review of how much land at Ravenswood could be rezoned from MRZ to Town Centre Zone.If an esplanade reserve or strip cannot be put in place along Pegasus lakefront, create open space zone to allow for continued public access. Seek allowance for a new community centre and something for youth nearby.
- Review how much land at Ravenswood could be rezoned from Medium Density Residential Zone to Town Centre Zone.

10.1.2 Assessment

Jan De Lange

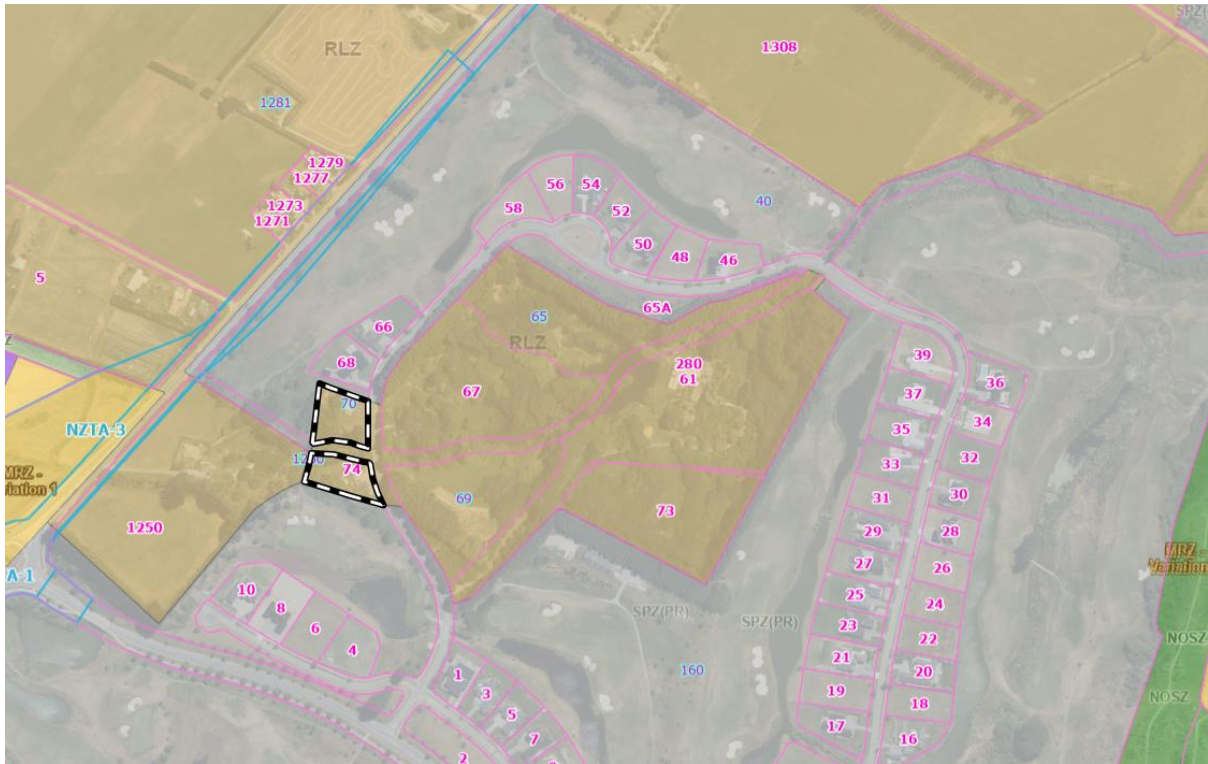


Figure 63 70 and 74 Mapleham Drive

808. This site is:

- Currently zoned as rural in the operative district plan;
- Proposed in the PDP as RLZ
- Outside the projected infrastructure boundary, as set out in Map A of the CRPS.
- Does not have an ODP in the operative or Proposed Plan, but is adjacent to an area which does have an ODP (the Mapleham existing development area).

809. These properties, held under one title, are currently zoned as rural, but proposed for rural lifestyle under the PDP. The submission seeks rezoning to general or medium density residential. I understand that the submitter may have since sold the property.

810. However I must still consider the submission. My understanding is that the properties were left out of the surrounding special purpose Pegasus resort zone SPZ(PR) due to proximity to the Taranaki Stream. However, as the natural hazard provisions are district-wide, and largely apply regardless of zone, these provisions would still apply to this site. I note that the surrounding SPZ(PR) zone and its ODP covers other privately owned properties of a similar allotment size, under activity area 7 – residential lots.



Figure 64 Pegasus SPZ ODP

811. Activity Area 7 is described as the following:

“Activity Area 7 - Residential contains eight enclaves of residential sites with an average lot size of approximately 2000m². These residential sites were created at the same time as the golf course development and have been designed to have aspects overlooking the golf course open space areas. The intention is for these lots to maintain their semi-rural appearance and outlook over the golf course with no further intensification anticipated. Activity Area 7 also include two additional residential sites that were created as balance lots and are now being developed for residential activity.”¹⁰⁵

812. As notified, activity area 7 applies most of the district-wide general and medium density zone provisions, noting the following differences¹⁰⁶:

- Applies a 10m height limit, compared with 8m for general residential and 12m for PDP medium density residential.
- Applies a 20% building coverage limit, substantially lower than the 50-55% for the PDP medium density zone,
- Applies a 10m setback from internal and road boundaries, compared with 6m or less setbacks for general or PDP medium density zones.
- Minor residential units are as per the rural lifestyle zone provisions.

¹⁰⁵ <https://waimakariri.isoplan.co.nz/draft/rules/0/286/0/0/0/224>

¹⁰⁶ Lots 212 DP403716 and Lot 230 DP 417391 have different rules from the other lots in Activity Area 7

813. I consider the SPZ(PR) to be substantially more stringent than the general or medium density residential sought by the submitter.
814. I now compare this to the rural lifestyle zone provisions, noting the following:
- The site is below the 4ha minimum for the rural lifestyle zone provisions, but as it was created between 1 October 1991 and 24 February 2001 one residential unit and one minor residential unit can still be created.
 - The home business, and rural industry provisions are more enabling than both the SPZ(KR) and GRZ/MRZ provisions.
815. The main differences between the rural lifestyle zone and the SPZ(PR) are the wider range of home business and rural activities that can occur on the site. However, I note that if these conflict with the activities in the SPZ(PR), there is likely to be conflict, both sensitivity and reverse sensitivity.
816. I consider there is limited difference between the general residential and medium density residential zones, I consider that neither of these zones are appropriate for this site, preferring that the SPZ(PR) is extended to this site as this ensures that character and rules are consistent throughout the area, preventing reverse sensitivity. This may remove some theoretical abilities around home businesses, which would become a discretionary activity under SPZ(PR)-R17.
817. However, I note that the new landowner has not sought rezoning, and may not be aware of the live submission.
818. I consider it finely balanced, but do prefer SPZ(PR) zoning in activity area 7, on account of the potential sensitivity issues. I thus recommend rejection of Jan De Lange's submission, but in doing so, the scope to recommend another zone is still available.
819. I do not consider that the recommendation will trigger or create any cultural issues, as the recommendation does not change the land use on the site, it merely normalises it in respect of the surrounding area.
820. The provisions of the SPZ(PR) zone are subject to hearing stream 12A, and the recommendations of Ms Jessica Manhire on the SPZ(PR) zone in her s42A report. She is aware of my proposed rezoning recommendations in respect of these properties.

Rhonda Mather and Woodend-Sefton Community Board



Figure 65 64,66,70 Pegasus Main Street (ODP zoning)

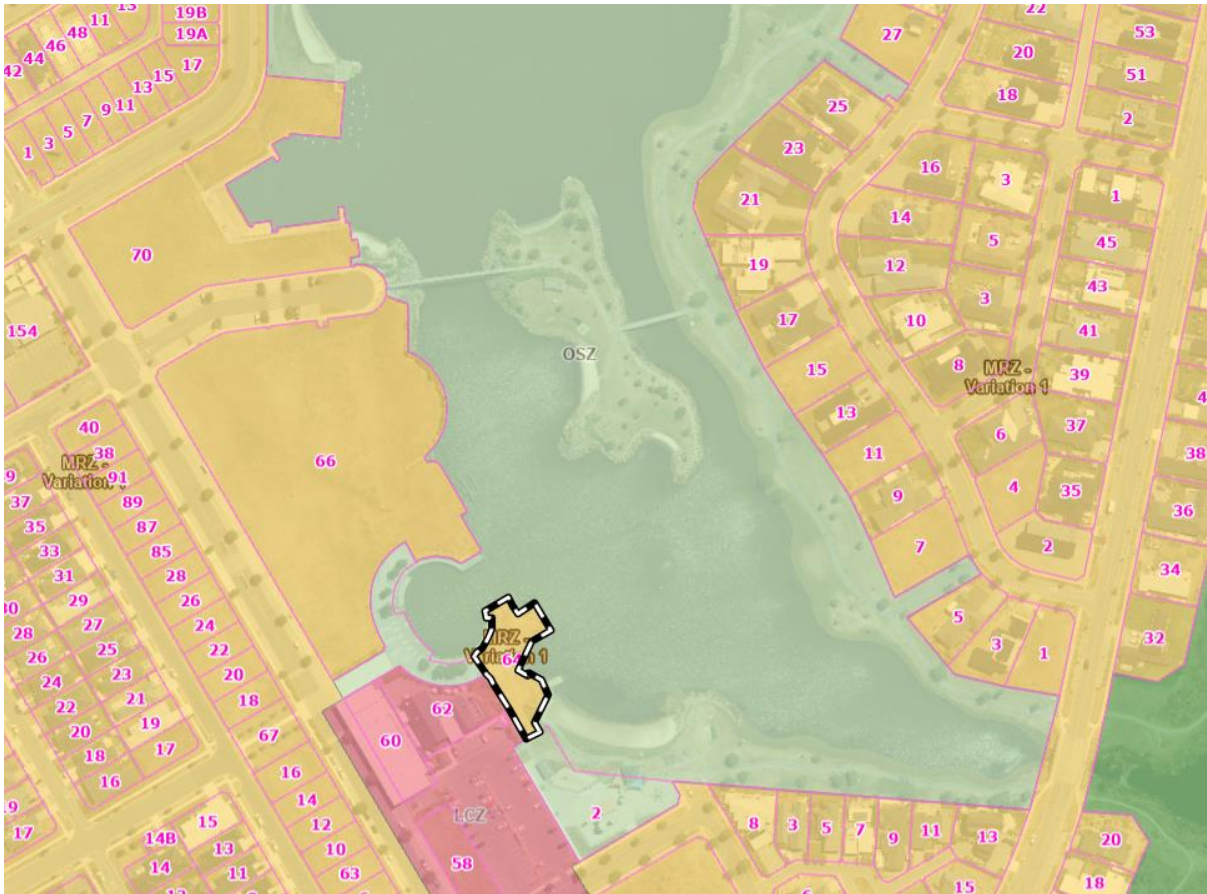


Figure 66 64,66,70 Pegasus Main Street (PDP zoning)

821. These sites are:

- Currently zoned as residential 6 and business in the operative district plan;
- Proposed in the PDP as residential.

- Inside the projected infrastructure boundary, as set out in Map A of the CRPS.
 - Has an ODP in the operative or Proposed Plan.
822. These three sections are owned by the primary Pegasus developer, Templeton Projects Limited. They are primarily zoned as residential 6 under the ODP, with a small section of business 1 on 66 and 70. They are proposed to be zoned as residential under the PDP.
823. The land to the south is local centre zone (pink above).
824. I understand from the submissions that the opposition is concerns that the area will no longer be available for businesses or community activities, if the proposed plan zoning is accepted. I note that the MRZ zone provisions still provide for most commercial and business activities, but restricted discretionary or discretionary consents are required.
825. I also understand that the bigger concern may be the loss of open space sites, as these areas are not currently developed, and form something of an informal reserve, albeit, they are private freehold land.
826. I note the opposition to the proposed rezonings from the developer in their further submission.
827. Given that the land is privately held, that development proposals for the sites may be being considered which would be affected by a rezoning, and the lack of evidence provided by the submitters, I recommend these submissions are rejected, and the proposed plan residential zoning remains.
828. If more open space land is required or desired in the area, I consider that it would require the sale and purchase of land.

10.1.3 Recommendations

829. I recommend the following outcome for submissions:
- Jan De Lange [91.1], Rhonda Mather [95.1, 95.2], Woodend-Sefton Community Board [155.10] are **rejected**.
 - FS Templeton Group [FS 81] is **accepted**

10.1.4 Plan-enabled capacity arising from these recommendations

830. I have not assessed plan-enabled capacity arising from these recommendations

10.1.5 Amendments

831. That the proposed plan maps and ODPs are updated to include 70 and 74 Mapleham Drive within Area 7 of the Pegasus Special Purpose Zone (SPZ(PR)).

11 Rezoning requests in and around Ravenswood

Cultural advice

832. Council sought separate advice from Mahaanui Kurataiao Ltd on behalf of Ngāi Tūāhuriri Rūnanga for sites north of Woodend. I note that this report is a preliminary assessment against the Mahaanui Iwi Management Plan to provide Council with guidance to the cultural impact of proposed rezoning of Stokes Land. The advice received is as follows:

- *The Kaitiaki representatives of Te Ngāi Tūāhuriri Rūnanga have reviewed the proposed rezoning of Stokes Land and have provided the recommendations outlined in Section 6.0 to align these proposals more closely with the provisions in the Mahaanui IMP.*
- *Waterbodies waterways, springs, etc, including ephemeral waterways) must be retained and incorporated into the design of development associated with this land re-zoning request.*
- *The future development must incorporate and protect natural characteristics of the landscape.*
- *Mature native trees onsite must be retained and incorporated into future subdivision design.*
- *Waterways should be protected and enhanced with suitable setbacks and riparian buffers planted with indigenous species (see policy WM12.5).*
- *There should be a survey undertaken to identify springs and/or wetlands on the site. This should be undertaken by a suitably qualified expert. Springs and wetlands should be protected and enhanced with suitable setbacks and indigenous riparian planting.*
- *Areas identified as culturally sensitive should be protected and enhanced. Consultation with the Papatipu Rūnanga may be required to determine culturally appropriate methods of enhancement.*
- *Low impact design methods, such as, the use of rain and greywater collection and re-use systems, and minimising impervious surface area is encouraged. Refer to Ngāi Tahu Subdivision and Development Guidelines (Appendix 1) for low impact design methods endorsed by mana whenua.*
- *Contaminated sites should be remediated. All contaminated material should be removed from the site and disposed of at a licensed facility.*
- *Measures to minimise earthworks should be considered at the design phase of development.*
- *Earthworks in areas with shallow depth to groundwater and/or over an aquifer can have significant cultural impacts and are of concern.*
- *The site should be surveyed by a suitably qualified person(s) to determine whether there are taonga species within the site that need to be protected.*
- *Refer to Ngāi Tahu Subdivision and Development Guidelines (Appendix 1) for guidance on stormwater, water supply and wastewater servicing.*

- *If the recommendations are provided for, the Rūnanga will not consider themselves to be an adversely affected party.*
- *Mahaanui Kurataiao Ltd reserves the right to update the recommendations when Te Ngāi Tūāhuriri Rūnanga provide feedback for individual developments within the proposed area as consultation with Rūnanga at pre-application stage does not eliminate the requirement for the consenting authority to consult with mana whenua at the application stage.*
- *Note: The list of recommendations is preliminary, general/non-specific and non-exhaustive and is provided as preliminary guidance only.*

833. The following cultural and heritage aspects are mapped in respect of the area:

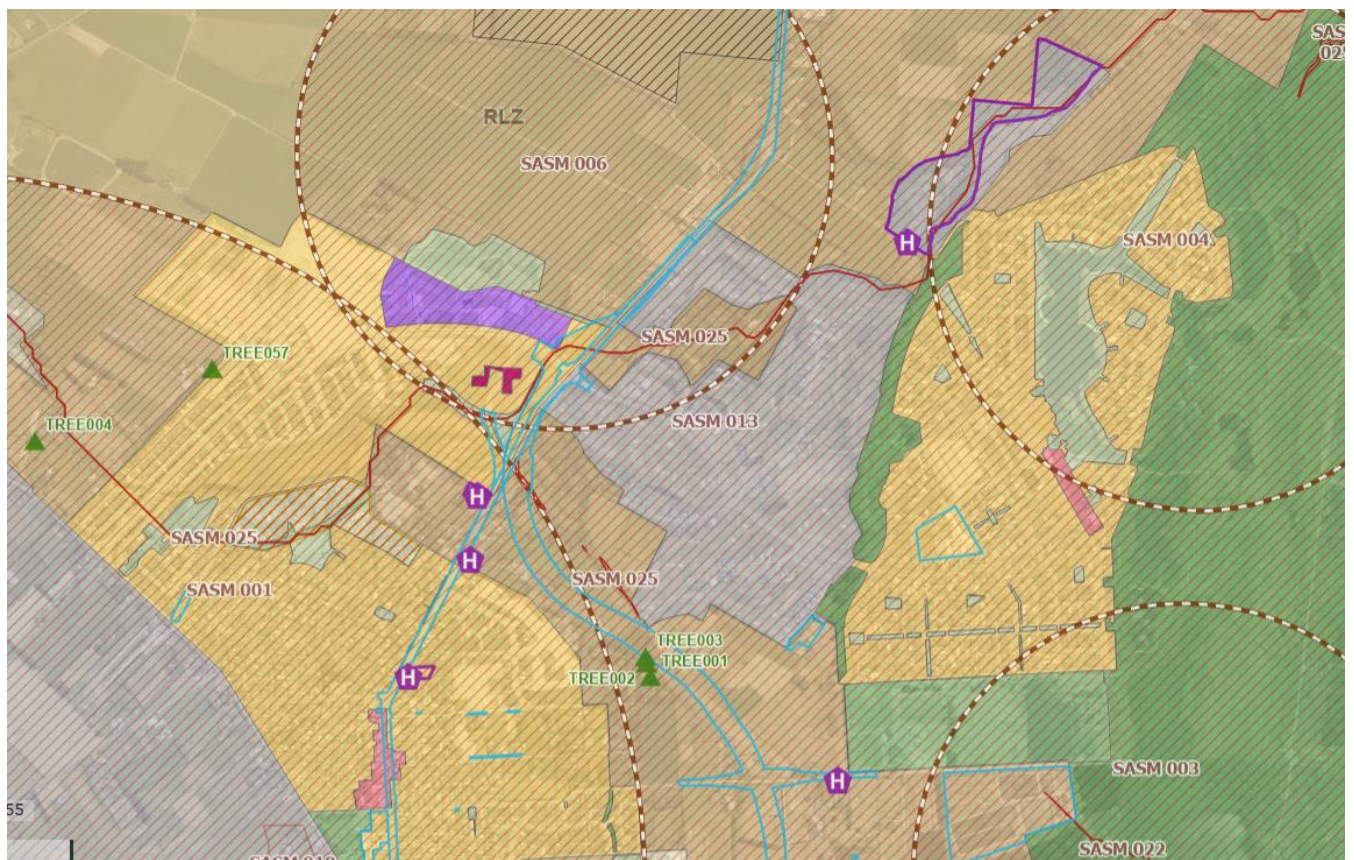


Figure 67 Cultural and heritage aspects North Woodend and Pegasus

834. North Woodend is covered by the following SASM:

- SASM 025 – Nga Wai – Rakahuri including tributaries
- SASM 006 – Wahi tapu – silent file
- SASM 001 – Wahi tapu, silent file
- SASM 013 – Nga turanga tupuna - Cultural Landscape encompassing an area of high coastal settlement (in both contemporary and ancestral senses). It comprises significant clusters of recorded archaeology of Māori origin and silent files

11.1 Ravenswood

11.1.1 Matters raised by submitters

835. This site is:

- Currently zoned as a mixture of residential and business zones in the operative district plan. I am responding to the residential components primarily;
- Proposed in the PDP as residential.
- Proposed as medium density residential under Variation 1.
- Inside the projected infrastructure boundary, as set out in Map A of the CRPS.
- Has an ODP in the operative or Proposed Plan.

836. Ravenswood Developments Ltd [347.1] request changes to the notified zoning of Ravenswood, as follows:

- Rezone the established/consented residential areas (Stages 1-5) to General Residential Zone.
- Rezone the undeveloped/planned residential areas (Stage 6) to Medium Density Residential Zone.
- Rezone the following sites to Town Centre Zone (DP 521536 unless otherwise specified):
 - Lot 203 – large vacant lot south of Bob Robertson Drive
 - Lot 2 – New World
 - Lot 12 – Childcare centre
 - Lots 13 & 14 – Consented mixed retail
 - Lot 15 – Vacant
 - Lots 11 & 202 DP 545570 – vacant lots east of Garlick Street
- Rezone the following sites to General Industrial Zone (DP 521536 unless otherwise specified):
 - Lots 100-135 – Industrial subdivision
 - Lots 9 & 10 – BP/McDonalds
 - Lot 201 – vacant lot north of BP/McDonalds
 - Lots 1 & 2 DP 545570 – Gull
- Apply Open Space Zone to the riparian margins of the realigned Taranaki Stream, and the neighbourhood parks within Stage 1a and Stage 4.
- Amend the zone boundaries to align with the roading and cadastral boundaries.
- Refer to Appendix 1 in the full submission for the proposed rezoning.

- 837. Ravenswood [347.93] request to rename the North Woodend Outline development plan to Ravenwood outline development plan.
- 838. Ravenswood [347.94] request for the notified North Woodend ODP to be replaced with a smaller scale ODP that guides the future development of the Ravenswood town centre and key activity centre, and a larger scale ODP for the wider Ravenswood development.

11.1.2 Assessment

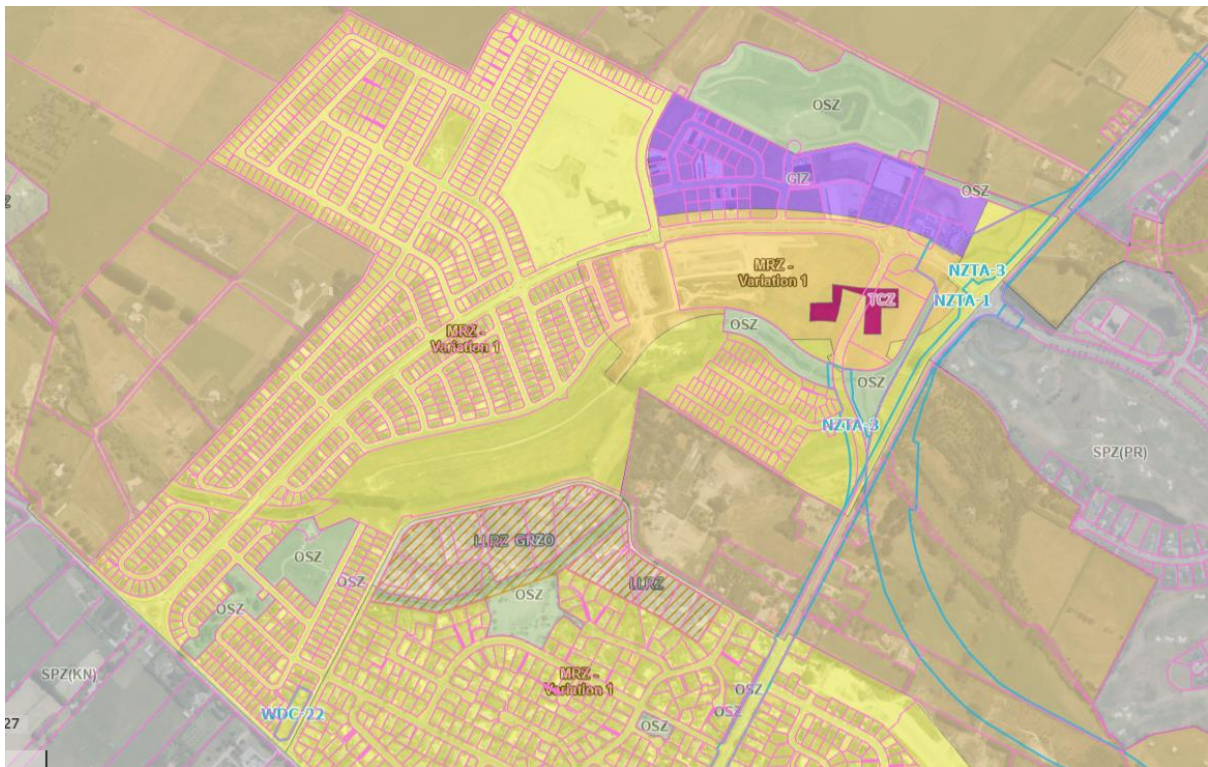


Figure 68 PDP proposed zoning for North Woodend

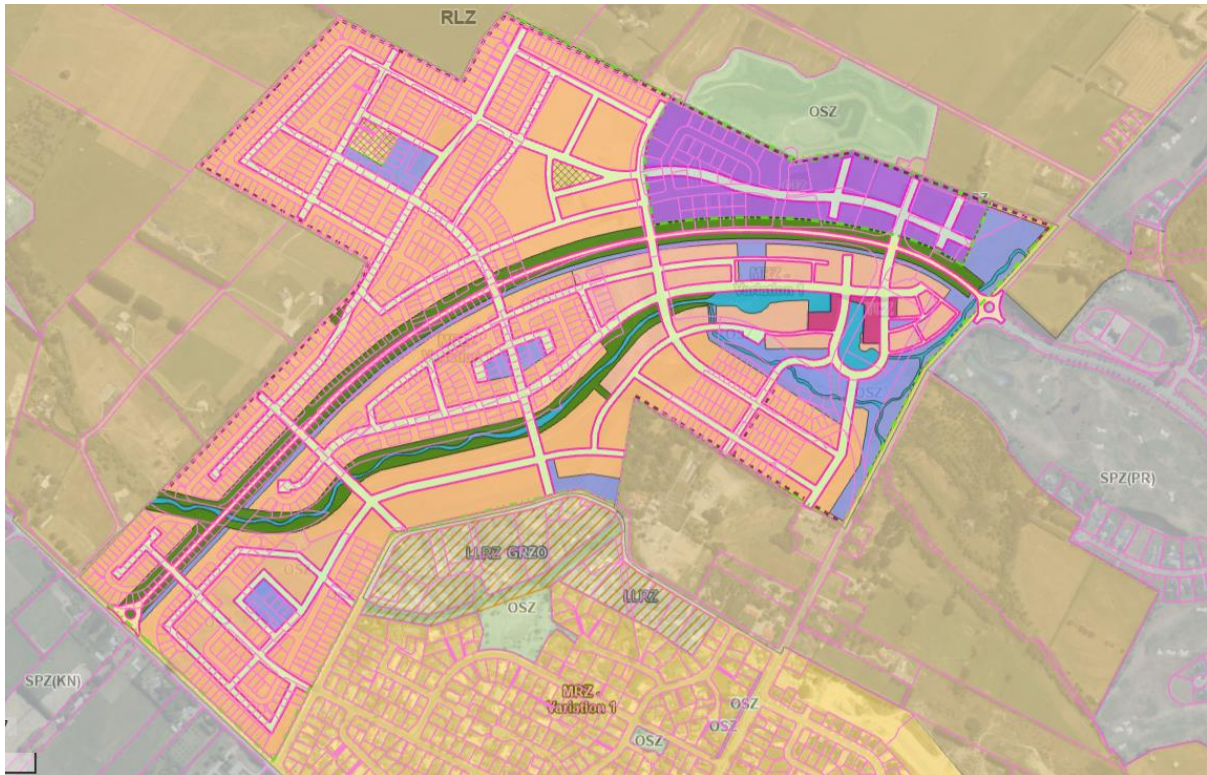


Figure 69 North Woodend notified ODP

839. I respond to the submission points in the order expressed above.

Rezone the established/consented residential areas (Stages 1-5) to General Residential Zone.

840. This has occurred under the Proposed Plan

Rezone the undeveloped/planned residential areas (Stage 6) to Medium Density Residential Zone.

841. The Proposed Plan has rezoned the areas to general residential, however Variation 1 proposes them to be further upzoned to V1 medium density.

Town centre and general industrial rezonings

842. I understand that Mr Willis has recommended these rezonings to TCZ and GIZ in his s42A report on commercial rezonings.

Apply open space zone to the margins of the realigned Taranaki Stream, and the neighbourhood parks within Stage 1a and Stage 4

843. These are parcels of reserve land that are owned by the Waimakariri District Council, following the creation of the first stages of Bellgrove North. However, they have not yet been rezoned with an open space and reserves classification, and from what I can ascertain from the cadastre, they are also not classified as reserve under legislation. This latter is an internal Council property management matter, but for the rezoning request, I agree and consider that they should receive open space and reserve zoning. I raised this with Mr Jon Read, from Council's greenspace team¹⁰⁷. The parcels, with their recommendation for rezoning from Mr Read¹⁰⁸ are:

¹⁰⁷ Email 10 July 2024

¹⁰⁸ Email from Jon Read to Peter Wilson, 10 July 2024

- Fee Simple, 1/1, Lot 2002 Deposited Plan 585926 - OSZ
- Fee Simple, 1/1, Lot 5004 Deposited Plan 533428 - NOSZ
- Fee Simple, 1/1, Lot 5003 Deposited Plan 533428 - NOSZ

844. I note that this is an example of what I raised in my policy discussion at the beginning of the report, where the exact boundaries of future land use cannot be known in advance, and that particularly for reserves and open space owned by Council, any open space and reserve zoning needs to be applied once subdivision stages are finished.

Amend the zone boundaries to align with the roading and cadastral boundaries.

845. In considering this I agree in principle, but note that as the development is not yet complete, the final location of roads is not yet known. It can occur for the existing stages of the subdivision, but not for all.

Request to rename the North Woodend Outline development plan to Ravenwood outline development plan.

846. In considering this, I note that all ODPs use neutral language that describes the location, rather than specific development names that submitters or applicants propose. I understand that Mr Willis made a similar recommendation in response to this request in his s42A on commercial and industrial rezonings in respect of Ravenswood. I recommend that the existing ODP name of North Woodend is retained.

Request for the notified North Woodend ODP to be replaced with a smaller scale ODP that guides the future development of the Ravenswood town centre and key activity centre, and a larger scale ODP for the wider Ravenswood development.

847. I agree with this request, and would be guided by Ravenswood in terms of the detail of the mapping. I consider this is more of a technical discussion about mapping, rather than making substantive changes.

11.1.3 Recommendations

848. That the following outcome for submissions occurs:

- Ravenswood Developments Ltd [347.93] is **rejected**
- Ravenswood Developments Ltd [347.1,347.94] are **accepted in part**

11.1.4 Plan-enabled capacity arising from these recommendations

849. As this area is within the Council's existing land use uptake monitoring survey, I have not included it in any future capacity assessments.

11.1.5 Amendments

850. As follows:

- As above for the parcels rezoned to OSZ
- Remap the zone boundaries to align with the road boundaries for existing completed stages of the development.
- Amend the ODPs to include a larger scale and smaller scale ODP

11.2 Stokes

11.2.1 Matters raised by submitters

851. This site (144 ha) is:

- Currently zoned in the operative district plan as rural;
- Proposed in the PDP as rural lifestyle
- Outside the projected infrastructure boundary, as set out in Map A of the CRPS.
- Outside the shaded areas within Map A, CRPS.
- Does not have an ODP in the operative or Proposed Plan.

852. B and A Stokes [214.1] request to rezone 33 Gressons Rd, 1301 Main North Road, 1281 Main North Road, 1271 Main North Road, 1273 Main North Road, 1275 Main North Road, 1277 Main North Road, 1279 Main North Road, 1319 Main North Road (approximately 144ha) to a combination of General Residential Zone and Medium Residential Zone. Mr Cleese describes the site as 81 Gressons Road and 1375 Main North Road in his EIC¹⁰⁹

853. This is supported in a further submission by Ravenswood Developments Ltd [FS 79].

11.2.2 Assessment

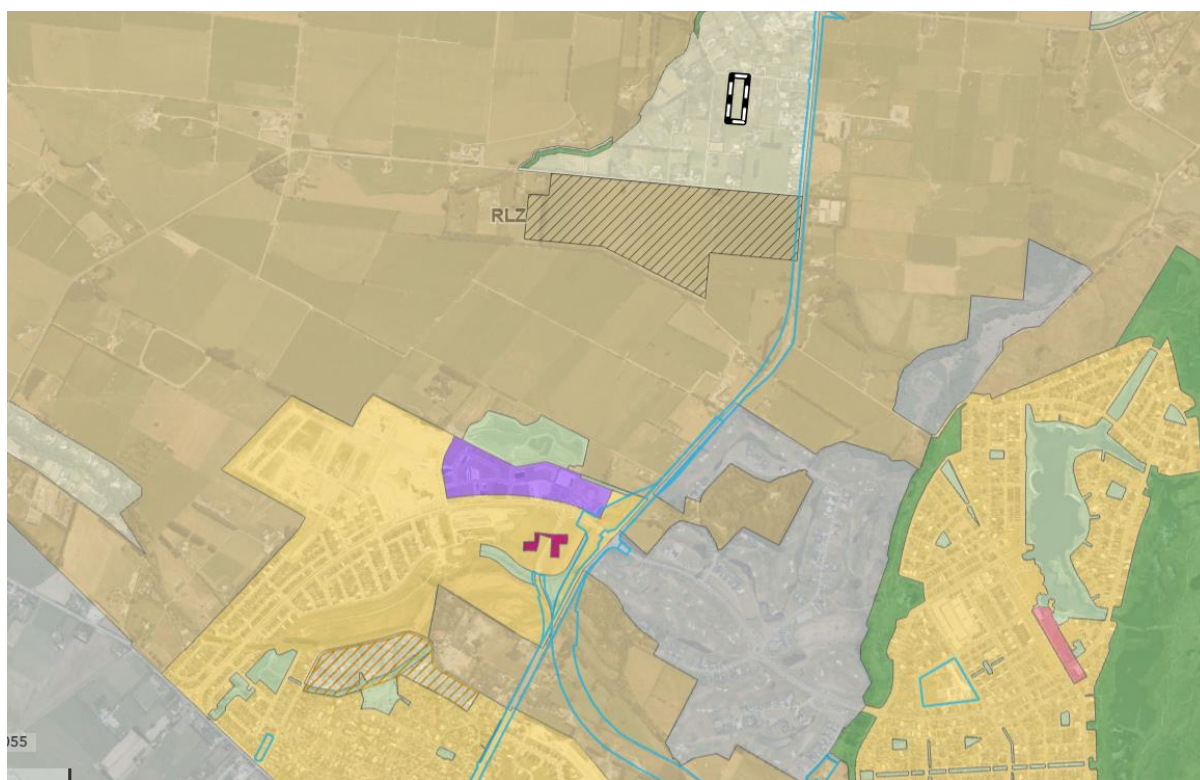


Figure 70 Stokes proposal (between North Woodend/Ravenswood and Waikuku)

Natural hazards

¹⁰⁹ Para 1.2, Jonathan Cleese, EIC

854. Mr Aramowicz comments:

- *There are large areas of low-medium flood hazard that flow from west to east across the mid-part of the application site.*
- *The proposed development intends to build over large parts of the existing overland flow path.*
- *DLS propose to construct a series of stormwater channels that will drain from W-E across the site to convey the flood flows through the site, as well as earthworks to create adequate surface drainage systems and allow floor levels to be established at an appropriate level.*
- *I note the area much further downstream of the site that stormwater will flow into already has a high flood hazard, and appears to be influenced by the effects of coastal inundation.*

Geotechnical

855. Mr Aramowicz comments:

- *Engeo identify various parts of the site have a moderate to high risk of liquefaction i.e. TC2 and TC3, but acknowledge this risk can be reduced by placing a raft of non-liquefiable fill, or other ground improvement, and selection of appropriate foundation systems for residential dwellings.*
- *Further, the alluvial soils across parts of the site of very soft and will subside (consolidate) when subject to additional loads (or changes in groundwater levels).*
- *Engeo identify the possible need for pre-loading and monitoring to mitigate the risk of subsidence occurring. I agree that this is one possible method of limiting the risk of subsidence.*

Stormwater

856. Mr Aramowicz comments:

- *The DLS (Davie Lovell Smith) Infrastructure Design report did not investigate whether the discharge of stormwater could result in an increased flood hazard to downstream properties where there is already an existing high flood hazard.*
- *However, based on existing WDC flood hazard modelling, and given the nature of the site, I expect that with careful engineering, the effect of any additional stormwater runoff from a future subdivision can be largely mitigated using onsite attenuation.*

Wastewater

857. Mr Aramowicz comments:

- *WDC's Chris Bacon has advised there are no existing services to the site, therefore, wastewater would need to connect to the existing services located at either Waikuku Beach or Ravenswood/Pegasus.*
- *WDC should consider whether it requires any developer-laid services to be upsized to allow for additional connections/capacity.*

- *Regardless, in summary, there are no known significant wastewater constraints that would prevent the proposed land use.*

Potable water

858. Mr Aramowicz comments:

- *Chris Bacon has advised that there are no existing water services to the site, and therefore a new development would need to connect to the existing services located at either Waikuku Beach or Ravenswood (or alternatively establish a compliant onsite water supply well).*
- *DLS note issues with nearby onsite wells. There is no certainty provided that a DWSNZ compliant water supply could be provided onsite. Given this, it seems the lowest risk option is to connect to the existing WDC network.*
- *WDC should consider whether it requires any developer-laid services to be upsized to allow for additional connections/capacity. Note there is a CDWSPZ in the area.*

859. *In summary, there is a risk of subsidence due to the presence of soft alluvial soils. There is also a moderate to high risk of liquefaction. Regardless, there are geotechnical solutions that can be used to reduce the risk of these hazards occurring. While there are areas of low-medium flood hazard associated with a large overland flow path that crosses the site, based on existing WDC flood hazard modelling and the submitter's submission, I expect that with careful engineering, the effect to downstream property from any additional stormwater runoff from a future subdivision can be largely mitigated using onsite attenuation.*

Transport:

860. Mr Binder comments:

- *From a transport servicing perspective, the proposed ODP has a good arrangement limiting access to/from SH1 but concentrating on via Gressons Rd and central Ravenswood area. Waka Kotahi is very sensitive to operational and safety impacts to the State Highway from additional accesses which the proposed ODP appears to limit.*
- *I consider that this area at present is not well served for walking, cycling, or PT, and has reasonable constraints on private motor vehicle service. However it is proximate to higher-service networks so will require some investment in connections to enable service in this area. I consider this to be entirely surmountable.*
- *I recommend not having a road access opposite the existing Macdonalds Lane intersection; four-way crossroads perform relatively less safely due to turning conflicts.*
- *I recommend cycleway connections be included in the ODP along the State Highway and Gressons Rd frontages.*

Urban design

861. Mr Jolly makes the following initial comments:

- *The ODP is effectively a greenfield development that bridges between the Ravenswood and the Waikuku settlement. From an urban design perspective this could be a useful transition of residential development from Ravenswood Town Centre. For example*

medium density residential adjacent to Ravenswood Town Centre, suburban density residential to the north of the proposed ODP site and then the low density of the rural residential lifestyle within Waikuku. However it is recognised this may also result in loss of legibility and character of Waikuku as a stand-alone settlement with rural pastoral land separating it from the urbanised fringe of Ravenswood.

- *From a connectivity perspective the proposed layout of the north/south primary streets will provide good legible connection to the emerging Ravenswood Town Centre, a key focus for retail and employment in the area. These connections also align with streets/vehicle access routes within the Waikuku settlement. The connectivity into Ravenswood provides potential alternative vehicle routes to State Highway 1 as well as cycle and pedestrian connectivity opportunities. It is noted that an area of stormwater management has been developed with the Ravenswood ODP between the future town centre and the Sparks site. Therefore the success of stitching the two ODPs together with these north/south connections is reliant on changes to the layout of the stormwater management area within the Ravenswood site.*
- *The overall street hierarchy proposed with primary connectors supported by secondary streets at regular intervals sets up a logical and effective grid for development which will promote good legibility and wayfinding internally within the ODP. It is noted that from the 'sketch' plans provided (figures 1&2) that due to lack of a legend to the plans and clear description the extents of the street network not completely clear. It is assumed that the black dashed lines are primary routes, the red dashed lines are secondary streets and the dotted yellow/brown lines are pedestrian and cycle routes. The diagram also illustrates where local streets and lanes will be located within each block in thick black solid and dashed lines (figure 3).*
- *In addition to the network of north-south and east-west streets proposed there are a number of pedestrian and cycle routes that follow riparian corridors, green links and openspaces. The result is a potential high quality active movement opportunities for future residents.*
- *In terms of the water courses identified in the proposed ODP (light and mid blue colours) it is unclear if these are daylighted streams, drainage 'swales' or culverted stormwater diversions. Hence the quality of the proposed 'blue-green corridors' is uncertain. It is also unclear in terms of proposed setbacks if they are in addition to councils' standards and wide enough to result in ecological enhancement and allow pedestrian and cycle paths.*
- *The proposal provides two public openspace reserves as well as 'green space' setback from the state highway. The larger 3.0 Ha centrally located reserve will provide a focus for future community residents. It is well located and benefits from connecting to the proposed green corridor and link. The smaller reserve is an elongated space which straddles the green corridor. This space could be improved and planned such that it has a more useable footprint, a more regular shape rather than the proposed lineal space. The green space adjacent to the state highway is generous and has the potential to provide passive recreational opportunities for future residents as well as stormwater management. Limited detail is provided in the ODP in terms of how activity is planned for this space. It is noted that the ODP also identifies a future 'Community Hub' although limited detail is provided in terms of what this activity is, its proposed location adjacent*

to the larger open space is well considered reinforcing the openspace as a potential future community focus.

- The proposed ODP does not provide much clarity on future lot orientation or size. As discussed above the site has the potential to provide a transition from the centre of Ravenswood north to Waikuku. Hence there is an opportunity to provide a range of lots sizes. Lots consistent with medium density 200-300m² could be proposed along the southern boundary within walking distance of Ravenswood and then more generous lots in the order of 500-600m² to the north of the site (aligning with the GRZ and OSZ). It is noted that if the approach was undertaken it would be important to provide additional open space to enable medium density within the blocks surrounding these lots within the southern half of the site.

Greenhouse gas emissions

- BECA reviewed the GHG evidence provided by the submitter. This is discussed below.

Cultural

862. The advice received from Runanga to date indicates that Runanga do not consider themselves adversely affected by the proposal, however, they would still be an affected party at subdivision consent stage.

863. I note that the development is occurring in a silent file area.

Applicant evidence

<u>Person/Organisation</u>	<u>Evidence type</u>
Mr Andy Hall	Infrastructure
Mr Neil Charters	Geotech
Mr Chris Rossiter	Traffic
Mr Gary Sellars	Market Valuation
Ms Nicole Lauenstein	Urban Design
Mr David Robotham	Environmental
Mr Jonathan Cleese	Planning
Mr Matt Lester	Landscape
Ms Natalie Hampson	Housing Capacity
Mr Paul Farrelly	Greenhouse Gas Emissions
Mr Ronald Payne	Ecology
Mr Victor Mthamo	Soils

Discussion

864. The site is a large area of rural land between Ravenswood in the south and Waikuku in the north. It is currently a dairy farm, owned by the submitters.

865. The applicants propose that the development will provide up to 1500 households regardless of if it is zoned as GRZ or MDRZ. I note that Mr Sellars' has calculated the yield to be approximately 13 hh/ha, which I consider is under the requirement in SUB-S3 for at least 15 hh/ha to be achieved, as no demonstrated site constraints have been outlined, however, I do not consider this deviation from SUB-S3 to be significant in my overall assessment as additional density can

be obtained from the development and/or required of it in order to achieve the permitted activity standard.

866. On geotechnical matters, Mr Charters, for the submitter, considers that the site is of a low to moderate risk of liquefaction, however Mr Aramowicz, for the Council, considers that the site is of moderate to high risk. Both engineers consider that mitigation and land treatment options are available to deal with the risk.
867. On natural hazards Mr Hall, for the submitter considers that stormwater flows above a 1:50 return period will be managed by the formation of a green space strip running along the site's western boundary to intercept overland flows from this direction, which will then be directed through the central portion of the site, to the storm water management areas, and then leaving the site via the existing SH1 culverts. For Council, Mr Aramowicz has not commented specifically on the adequacy of these onsite measures, although I expect that they would likely be sufficient. He has however raised concerns with the high water tables and potential coastal inundation where the stormwater management areas exit the site. Mr Hall has noted that the SH1 culverts may not have sufficient capacity¹¹⁰, and that the Council waterways downstream may not have sufficient capacity due to maintenance.
868. I consider this to be a substantive matter. If stormwater cannot be effectively disposed of on site, and/or is reliant on the downstream capacity of the waterways in which it enters. I note Mr Aramowicz is concerned about high water levels and coastal inundation downstream, rather than maintenance of waterways. Also, if the stormwater system is dependent on upgrading the SH1 culverts, then development may not be able to proceed until this occurs. I do not consider that submitters have supplied sufficient information on the downstream capacity for stormwater for me to be able to make a recommendation on the stormwater component of this rezoning proposal.
869. On three waters, the engineers appear to be in relative agreement. The potential to connect this proposed site to the wastewater network exists, however, upgrades will be required. It is the same for potable water, with Mr Aramowicz noting that the safer option would be to connect the site to the existing town supply, rather than to use bores. All of these options will require development and/or financial contributions, and would have to be in place prior to the issuing of titles.
870. On transport Mr Rossiter, for the applicant, has considered that there is sufficient capacity to absorb the additional traffic generated by an additional 1500 households, primarily through an additional roundabout on SH1 at the Gressons Road/SH1 intersection, and also through Ravenswood. Mr Binder, for Council, is supportive of limiting accesses onto SH1 to Gressons Road and the existing Ravenswood access, although he notes that this is an NZTA, rather than Council matter. Mr Rossiter notes that the area is well-suited to cycling and pedestrian networks, and an addition to the existing public transport network that serves Ravenswood. Mr Binder also considers this to be a substantial opportunity presented by the proposal, and also requests that a cycleway is provided alongside SH1 as part of this development, if it were to proceed.
871. Mr Binder considers that the proposed access onto Gressons Road should not occur opposite Macdonalds Line, as four way intersections create safety issues.

¹¹⁰ Section 8.19 Mr Hall, EIC.

872. I note that as I consider 1500 households at 13 hh/ha to be too low, that additional traffic over and above what Mr Rossiter may have modelled, will be generated. This is unlikely to be an issue and I do not consider it to be substantive or determinative on my recommendation, however, I consider it should still be modelled.
873. On ecology, Council did not seek specific ecological advice. For the submitter, Mr Payne considers that the site has low ecological values at present, but that there are some moderate ecological values remaining in Stokes Drain, which would be enhanced as a result of this proposal. Mr Payne also notes the extensive wetlands that would be created in the stormwater management areas. I note the request from manawhenua to ensure the retention of existing mature native trees, the protection of existing waterways and their enhancement with suitable buffers.
874. On greenhouse gas emissions, Mr Farrelly, for the submitter has provided an assessment of greenhouse gas emissions as a result of the proposed development. Mr Farrelly, in his conclusion has stated that the proposed redevelopment “supports a reduction in GHG emissions”¹¹¹, by way of removing dairy cows from the land. Council has engaged BECA to review that assessment. In contrast to Mr Farrelly, the BECA review finds that the proposed development would result in substantially higher emissions than the baseline dairy farm scenario. I reproduce Figure 3 from the BECA review below:

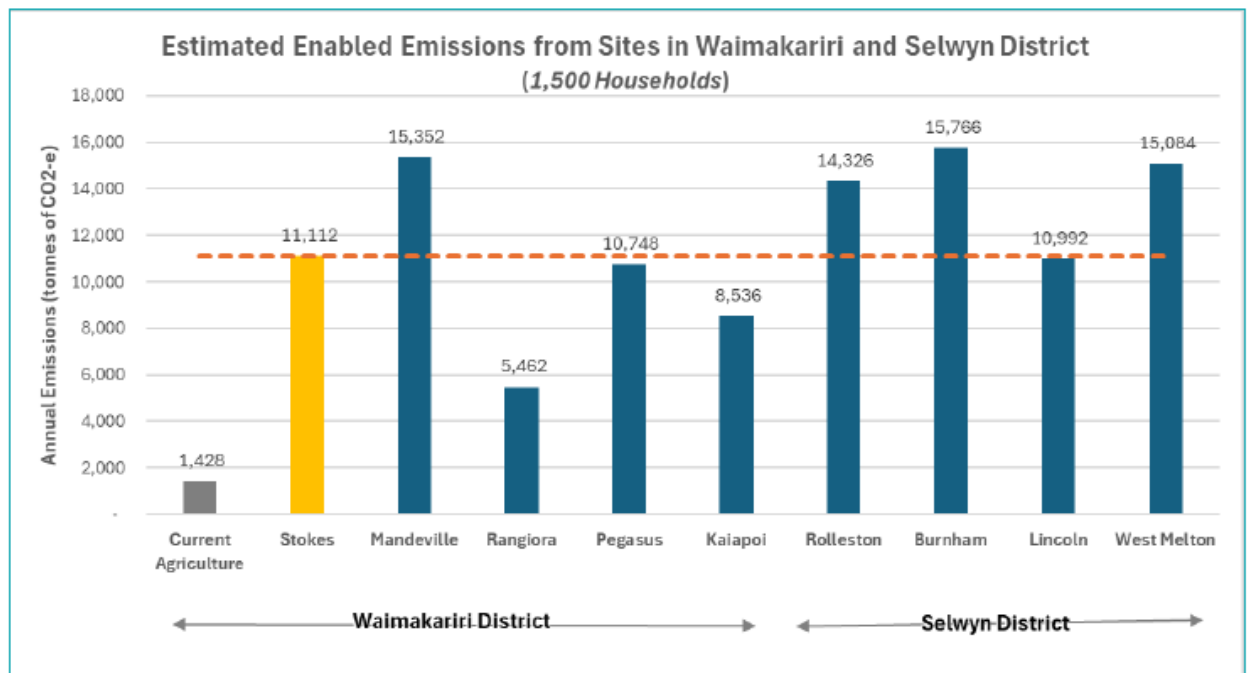


Figure 3 – Estimated emissions from transport based on 2028 modelled daily average trip length – ordered by distance to the Christchurch CBD

Figure 71 BECA Stokes GHG review (Figure 3 within this review)

875. According to the BECA review, GHG emissions rise from 1426 tCO₂e to 11,112 tCO₂e based on expected transport patterns in 2028 with the proposed number of households¹¹². This is a

¹¹¹ Para 9.1, Mr Farrelly, EIC

substantial difference from what the submitter has stated. It appears that new development sites have a higher emissions than the existing towns of Rangiora and Kaiapoi, but that all proposed greenfield developments will have higher emissions than the farms they replace.

876. This may be determinative on the proposal in the overall context of where developments should be located in the district, as I consider that given both the NPSUD and CRPS requirements to reduce carbon emissions, most of which in this context come from private vehicle VKTs, if developments can be located closer to Rangiora or Kaiapoi, their emissions will be substantially less, but still more than rural land.
877. On urban design, Ms Lauenstein, for the submitter notes that the proposed site will achieve the minimum density required of just over 12 households per ha, but does not preclude a higher density of 15 households per hectare. Mr Jolly has commented that the southern area of the development is better suited to higher densities, with larger lots potentially being available further north. From a planning perspective, I note that subdivision standard SUB-S3 does not set a minimum of 12 hh/ha, it sets a minimum of 15 hh/ha, except where constraints are demonstrated. The urban design, amongst the other evidence, does not currently consider this requirement of the PDP.
878. On the other aspects of urban design, I consider that Mr Jolly and Ms Lauenstein are largely in agreement, noting Mr Jolly's concerns on the following aspects of the design:
- The potential loss of landscape legibility and character, noting that manawhenua have also raised this as a concern
 - The need to change the existing stormwater management areas north of Ravenswood to ensure connectivity between the two developments. Ms Lauenstein has briefly commented on this¹¹³.
 - The lack of detail on the quality of the blue-green corridors and networks.
 - The lack of detail of the proposed community hub.
 - The lack of detail on the proposed lot sizes, their layout, and orientation.
879. Apart from yield, which I discuss below, whilst I consider that these aspects of the design should be clarified, or improved, I do not consider them to be determinative on my recommendations.

Overall consideration

880. The site is currently zoned as rural, and proposed to be rural lifestyle in the PDP. It is outside of the shaded areas of Map A, CRPS. There is thus no pathway to consider it under the CRPS. I must assess it under the NPSUD responsive planning provisions. Under policy pathway 2, any assessment under these planning provisions leads back to the CRPS on those matters that the CRPS already gives effect to the NPSUD on, which as I have considered above in my preamble to this report, is that the CRPS defines what a well-functioning urban environment is, and how to test it.
881. Policy 8 NPSUD requires the proposal to provide both significant development capacity and contribute to well-functioning urban environment. I consider that the site provides significant

¹¹³ Pg 31, Ms Lauenstein, EiC

development capacity, as 1500 homes is by far the largest rezoning proposal in the District that I have evidence to assess on.

882. Whether or not the proposal contributes to a well-functioning urban environment is to assess against the CRPS provisions that I consider define what a well-functioning urban environment is, particularly CRPS policy 6.3.11(5) and those objectives and policies that discuss key activity centres:
883. Under policy interpretation pathway 2. I have considered this proposal against the CRPS criteria in 6.3.11(5) for extending development areas, and consider that the following:
- Infrastructure is not in place, but experts agree that it is able to be provided. I lack evidence to determine if it can be provided economically and efficiently at this point in time, particularly around who pays for upgrades and any mechanism that requires the necessary upgrades ahead of development. This is a particular concern for stormwater.
 - Provision has been made for safe and convenient access to community, social, and commercial facilities, but on the evidence supplied, this may not be sufficient.
 - I consider that the proposal achieves urban consolidation is achieved, by focusing development around the already identified Ravenswood KAC.
 - The future urban land use does not intend to contaminate any drinking water sources, including groundwater recharge zones, but I note there is a drinking water protection zone in the area.
 - Sufficient rural land is retained to maintain the open space character either between or surrounding the areas of urban activity within Greater Christchurch. On this, the proposal does convert an existing rural area to residential, however, the area does not lie between any identified urban areas on Map A. There is no urban area to the north of Ravenswood identified on Map A. Waikuku itself is a large lot residential zone, and not urban.
 - The operational capacity of strategic infrastructure is not compromised. The proposal has considered state highway 1 and the need to protect it from a potential proliferation of accesses.
884. Central to my assessment of a well-functioning urban environment is its proximity to the existing Ravenswood Key Activity Centre (KAC).
885. Further to the CRPS policy 6.3.11(5) consideration above, I note that a substantial number of CRPS objectives and policies, namely objectives 6.2.1(2), 6.2.2(2), 6.2.5(2), required the identification of (in Map A) and protection of Key Activity Centres. Policies 6.3.1(8) explicitly required the avoidance of development that adversely affects the function and viability of, or public investment in, the Central City and Key Activity Centres.
886. I note the natural hazard provisions in Chapter 11, CRPS, and the Objective 1 NPSUD consideration that a well-functioning urban environment requires consideration of peoples health and safety. As natural hazards are a component of health and safety, I consider that there is a requirement to consider those as part of the well-functioning urban environment.
887. I consider that I lack sufficient evidence on the following aspects of the proposal to be able to recommend approval of the development at this time:

- Downstream capacity for stormwater, both through the culverts under SH1, and beyond.
- The yields that the subdivision will achieve, particularly in respect of the PDP requirements to achieve 15 households per ha.
- The rule framework, and/or other mechanisms that will ensure that the necessary upgrades occur prior to beginning development, and/or staged throughout the development.

888. I thus recommend that the submissions are rejected, with the land remaining as rural, proposed to be rural lifestyle under the PDP.

11.2.3 Recommendations

889. That the following outcome for submissions occurs:

- That B and A Stokes [214.1] is **rejected**
- That further submission Ravenswood Developments Ltd [FS 79] is **rejected**

11.2.4 Plan-enabled capacity arising from this recommendation

890. I consider the following plan enabled capacity arising from these recommendations:

- I consider this to be an unanticipated urban environment, as it is not within the shaded areas of Map A, CRPS.
- There is a gross area of 144ha as stated by the submitter. I understand that a range of densities are proposed on the site, so I will consider a broader range for capacity purposes. I consider that the reserve requirements for the site would fall in a range of between 40%-60%, on the basis of the submitter's supplied ODP, and Mr Jolly's design additions. I assess a 60% reserve requirement, to be conservative.
- Applying a 800m² lower bound allotment size, and a 200m² full MDRS upper bound scenario, this results in a plan-enabled capacity of 720 at 800m², of 2880 at a full MDRS scenario of 500m², and 1800 as an average scenario.
- I note the submitters statements of achieving 1500 homes, which I consider on the low side, however, on the evidence before me, I also consider that the nature of the proposed development will not approach the 2880 upper bound MDRS scenario. It does however outline the capacity effect of higher densities at volume, and how quickly that adds up to higher capacity, even with additional and generous reserves.

11.2.5 Amendments

891. No amendments are proposed.

12 Rezoning requests in and around Kaiapoi

892. The cultural advice is as set out above, requiring the achievement of the following in respect of this block (area 4) in the MKT report:

- *Waterways should be protected and enhanced with suitable setbacks and riparian buffers planted with indigenous species (see policy WM12.5).*
- *There should be a survey undertaken to identify springs and/or wetlands on the site. This should be undertaken by a suitably qualified expert. Springs and wetlands should be protected and enhanced with suitable setbacks and indigenous riparian planting.*
- *Areas identified as culturally sensitive should be protected and enhanced. Consultation with the Papatipu Rūnanga may be required to determine culturally appropriate methods of enhancement.*
- *Low impact design methods, such as, the use of rain and greywater collection and re-use systems, and minimising impervious surface area is encouraged. Refer to Ngāi Tahu Subdivision and Development Guidelines (Appendix 1) for low impact design methods endorsed by mana whenua.*
- *Contaminated sites should be remediated. All contaminated material should be removed from the site and disposed of at a licensed facility.*
- *Measures to minimise earthworks should be considered at the design phase of development.*
- *Earthworks in areas with shallow depth to groundwater and/or over an aquifer can have significant cultural impacts and are of concern.*
- *The site should be surveyed by a suitably qualified person(s) to determine whether there are taonga species within the site that need to be protected.*
- *Refer to Ngāi Tahu Subdivision and Development Guidelines (Appendix 1) for guidance on stormwater, water supply and wastewater servicing.*
- *Note: The list of recommendations is preliminary, general/non-specific and non-exhaustive and is provided as preliminary guidance only.*

893. I note the following sites of significance to Māori (SASM) and other heritage listed items in the area:

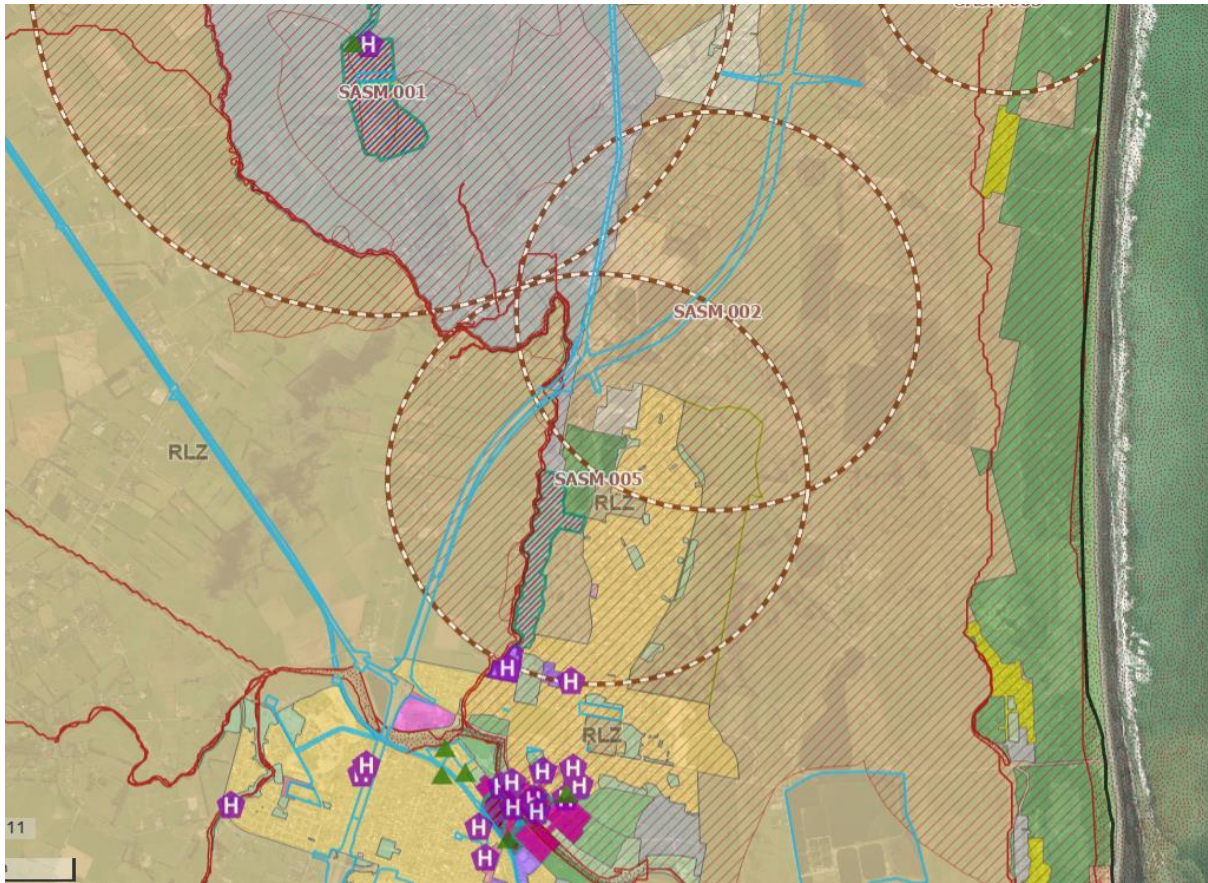


Figure 72 Cultural and heritage aspects of Kaiapoi

894. There are two SASM 001 and 005 over Kaiapoi, which are wahi tapu 'silent' files. The area of these SASMs covers the bulk of northern Kaiapoi.

12.1 General Kaiapoi rezonings

12.1.1 Matters raised by submitters

895. Gregory David Murphy [13.1] requests to rezone 108 and 110 Williams Street for residential use as it is currently developed and used for residential purposes, there are no plans to remove the house or develop the site, and adjacent land at 112 Williams Street is zoned residential.

896. This is opposed in a further submission by CIAL [FS 80].

897. Steve Higgs [119.1,119.2] would prefer the current open space in the Kaiapoi SPZ on the south eastern side of Courtney Drive was maintained. He seeks to:

- Extend Open Space Zone to create continuous buffer for the residences on the south side of Courtney Drive.
- SPZ(KR)-R32 - Motorised vehicles and SPZ(KR)-R33 Motorised sports facility should be non-complying as there is limited ability to achieve sufficient separation distances with surrounding residential areas.
- Visitor accommodation should be of a similar scale to buildings related to other activities (200m² - 250m²).

- It is unclear how Retail activity areas relate to the building areas of other typical activities and why the maximum area of 400m² is so high.
- Support requirement of 75% native species and 10% of area (for activities requiring buildings).
- Seek building setbacks and planning requirements along the NOSZ boundary of 20m.
- 500m² minimum subdivision standard is very intensive for land affected by earthquakes. Seek clarification on Council's intention to retain or sell this land to private interests.
- Extend the Natural Open Space Zone (NOSZ), currently north of the Special Purpose Zone - Kaiapoi Regeneration (SPZ(KR)), to include all of the south eastern section of the land between Courtney Drive/Courtney Lake and Courtney Stream.
- Alternatively, if the SPZ(KR) is retained:
 - Change activity status of motorised sports and events to non complying
 - Maintain visitor accommodation buildings at residential scale (250m²)
 - Limit potential retail activity size to the appropriate activity associated with the other dominant activities.
 - Increased building setback between the SPZ(KR) and the NOSZ with planning requirements in recognition of high natural area amenity. Prefer a 20 metre setback with planting/ landscaping requirements.
- Extend the Open Space Zone around the remaining residence on The Oaks to provide separation between the residential building and SPZ(KR).

898. Philippa Novell [66.1] does not oppose the Sutherland Drive new subdivision but seeks to have a strip of space retained between the new and existing properties to allow space for wildlife that live in the current field. She requests to retain a strip of land between the new and existing properties to allow space for wildlife living in the current field.

899. Albert David Jobson [288.1] objects to future use being changed from its current rural use, due to:

- Increased risk to property from natural hazards including tsunami and flooding
- Sufficient land available for future development west of Main North Road
- Residents enjoy current wildlife, trees, rivers and lakes and overbuilding has an effect on waterways and wildlife. Leave the land zoned rural and seek other options for redevelopment areas in the Waimakariri district.

900. Callum Ross [206.1] considers that 71 Adderley Terrace, Kaiapoi, is ideal for a higher density development such as that afforded by the operative Area A rules or the proposed medium density residential standards.

901. This is opposed in a further submission by CIAL [FS 80].

902. Paul Lupi [268.1] considers that the proposed general residential zone for South Kaiapoi and Silverstream is inconsistent with the proposal for MDRZ for the north side of Kaiapoi. He requests to rezone all of the Kaiapoi urban area to medium density residential zone.

903. This is opposed in a further submission by CIAL [FS 80].

904. Williams Waimak Ltd [239.1] oppose in part the land at Lot 1 DP 345997 and Lot 3 DP 40787 being zoned as general residential, and prefer for it to be medium density residential.

905. This is opposed in a further submission by CIAL [FS 80].

12.1.2 Assessment

Gregory David Murphy



Figure 73 108 Williams Street

906. This site is:

- Currently zoned in the operative district plan as business 2;
- Proposed in the PDP as GIZ
- Inside the projected infrastructure boundary, as set out in Map A of the CRPS.
- Inside the shaded areas within Map A, CRPS.

907. The submitter wishes to rezone 108 and 110 Williams Street as residential. I note that there is no 110 Williams Street identified on the cadastre. I thus assess 108 Williams Street.

908. The property appears to be an established residential dwelling, which is surrounded on three sides by industrial land use. The property in front at 106 Williams Street is a commercial building with carpark. 104 Williams Street is a retail warehouse, and behind at 88 Williams Street is

another industrial warehouse. I consider that the predominant use is industrial, and whilst residential use may still occur on the dwelling at 108 Williams Street, any rezoning to residential may result in reverse sensitivity issues on the predominant land use. I also note the practicality of managing effects at boundaries in the absence of buffers or other design mechanisms. If at some future point, the landowners wished to sell and move on, there is likely more benefit in their property being zoned to the predominant land use, rather than the existing land use.

909. I thus recommend rejecting this submission, and retaining the PDP GIZ zoning for the site.

Steve Higgs

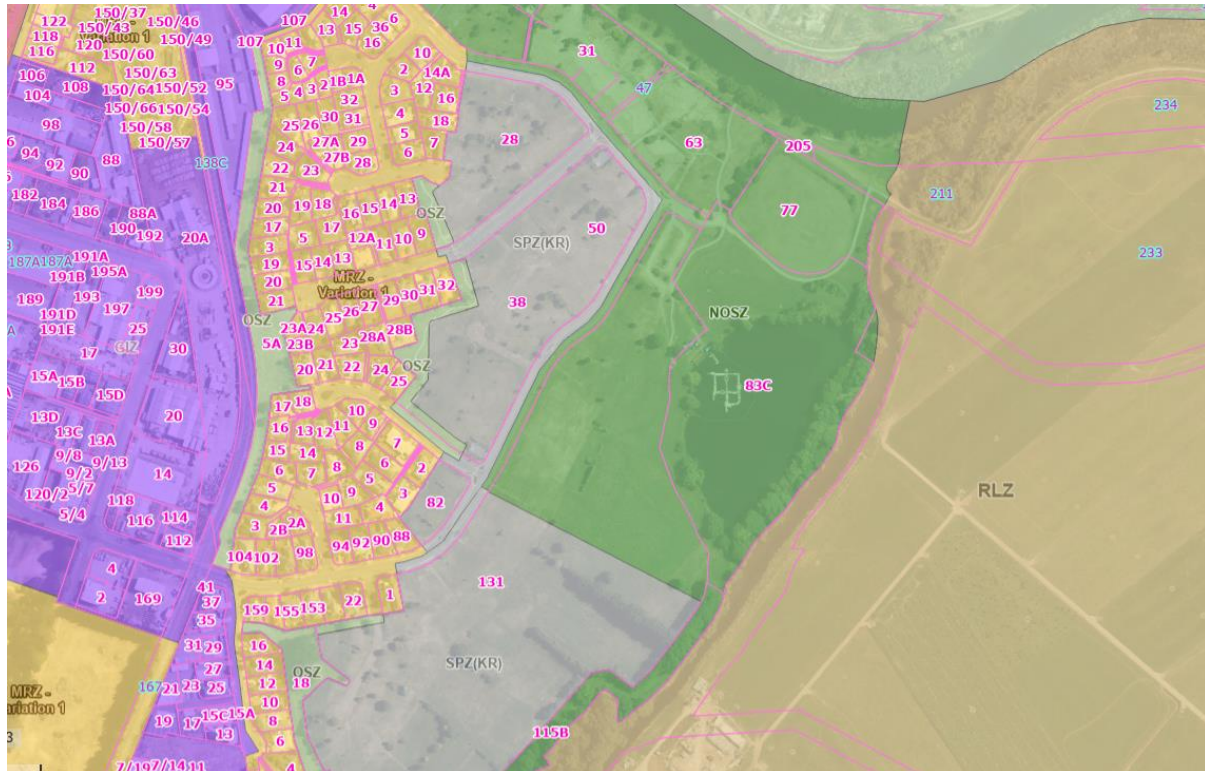


Figure 74 Kaiapoi SPZ

910. This site is:

- Currently zoned in the operative district plan as a mixture of residential 1 and rural;
- Proposed in the PDP as a mixture of SPZ(KR) and NOSZ;
- Inside the projected infrastructure boundary, as set out in Map A of the CRPS; and,
- Inside the shaded areas within Map A, CRPS.

911. My understanding is that given the broad potential for future land use in the SPZ(KR) zone, Mr Higgs wishes to ensure there is an appropriate buffer between that zone and the residential zone.

912. In responding to this, I have discussed the matter with Council planners and consultants familiar with the history of the area. I note:

- The land was formerly residential, and then ‘red zoned’ following the Canterbury earthquakes. It is now owned primarily by the Waimakariri District Council.

- It was originally intended to be down-zoned to rural or rural lifestyle, however, later decisions were made, to retain it for a wide range of possible future land uses, provided that the natural hazard risk could be mitigated.
- The non-contiguous OSZ zone in this area was intended to provide connection through the zone, rather than to provide a buffer between the zones. The OSZ has not been updated to consider the future land use under the special purpose zone, because it was intended for a different purpose.

913. I thus agree in principle with the submitter that there should be a buffer between the zones, especially as the recommendations from other authors are to retain the SPZ(KR) zone. The submitter suggests 20 metres, which is how I would have begun any assessment of a potential buffer, as 20 metres is the default esplanade reserve or marginal strip distance.

914. I have asked Mr Jolly to produce an outline plan showing this potential buffer.

915. I note that some parts of the buffer will be wider than 20 metres, as a result of the existing OSZ in the area. I do not recommend reducing the buffer size to 20 metres where this occurs, rather, I propose ensuring that the buffer is at least 20 metres.

916. I recommend that the OSZ applies as per Mr Jolly's suggestions below:



Figure 75 Proposed additional buffers

Philippa Novell, Albert David Jobson

917. The development site the submitters (who are zoned residential) refer to is the Kaiapoi FDA. It is:

- Currently zoned in the operative district plan as rural;
- Proposed in the PDP as rural lifestyle.
- Inside the projected infrastructure boundary, as set out in Map A of the CRPS.
- Inside the shaded areas within Map A, CRPS.

918. These submitters appear concerned with the potential rezoning of land east of Sovereign Palms, in the Kaiapoi FDA, in north east Kaiapoi and the effect that this will have on their property and outlook.

919. I note that the Kaiapoi FDA has been proposed as an anticipated urban environment for a number of years, beginning with Change 1 to the CRPS, and contains an ODP that provides a buffer strip between Sutherland Drive and the new development.

920. Whilst I note that these submitters have concerns with the potential loss of a rural eastern outlook, I also note that the landowners, and developers, in the FDA, equally have an expectation of being able to develop their land, by way of being in the FDA. This is the area identified for future growth of Kaiapoi.

921. As with the previous submitter, there is always a challenge at boundaries, and especially where land use changes. As the area east of these submitters was proposed as an anticipated urban environment by inclusion in Map A, I consider that a change in land use in this location could have been anticipated by the submitters, and thus, I recommend rejecting their submissions. Even if I were to accept their submissions, I could not alter the extent of the development area as set out in Map A, CRPS.

Williams Waimak Ltd



Figure 76 12 Williams Street, Kaiapoi

922. This site is a former Scouting New Zealand property informally known as “Blue Skies”. It is zoned as residential 2 under the operative district plan, and proposed as general residential. It is also proposed as medium density residential under the Proposed Plan.

923. Part of the site is zoned as business 2 under the operative district plan, and proposed for general industrial.

924. It is owned by Williams Waimak Ltd, one of the submitters.

925. In response to the submitters request for it to be rezoned as medium density residential, I note that it is proposed as medium density residential under Variation 1.

Callum Ross

926. I note that this site is currently zoned as residential 7, and proposed as general residential. It is also proposed as medium density residential under Variation 1.

927. I consider that the submitter's relief is given effect to by the proposed zoning in Variation 1.

Paul Lupi

928. The submitter requests that all of South Kaiapoi is rezoned as medium density residential. This is proposed under Variation 1.

12.1.3 Recommendations

929. That the following outcome for submissions occurs:

- Gregory David Murphy [13.1], Philippa Novell [66.1], Albert David Jobson [288.1], Callum Ross [206.1], Paul Lupi [268.1], Williams Waimak Ltd [239.1] are **rejected**
- Further submissions FS CIAL [FS 80] is **accepted**
- Steve Higgs [119.1,119.2] is **accepted**

12.1.4 Plan-enabled capacity arising from these recommendations

930. There is no additional plan-enabled capacity arising from these recommendations.

931. There may be a slight loss in capacity in the Kaiapoi SPZ(KR) as a result of the additional buffers, as, but as this is not a residential zone, I do not consider that the NPSUD requires Council to monitor capacity within it. Either way, it is only a slight loss through the incorporation of the additional open space reserves.

12.1.5 Amendments

932. That the Proposed Plan zoning maps are amended to include additional open space zoning between the SPZ(KR) and the existing residential zoning, as per Mr Jolly's recommendations on open space buffers above.

12.2 Darren Waine

12.2.1 Matters raised by submitters

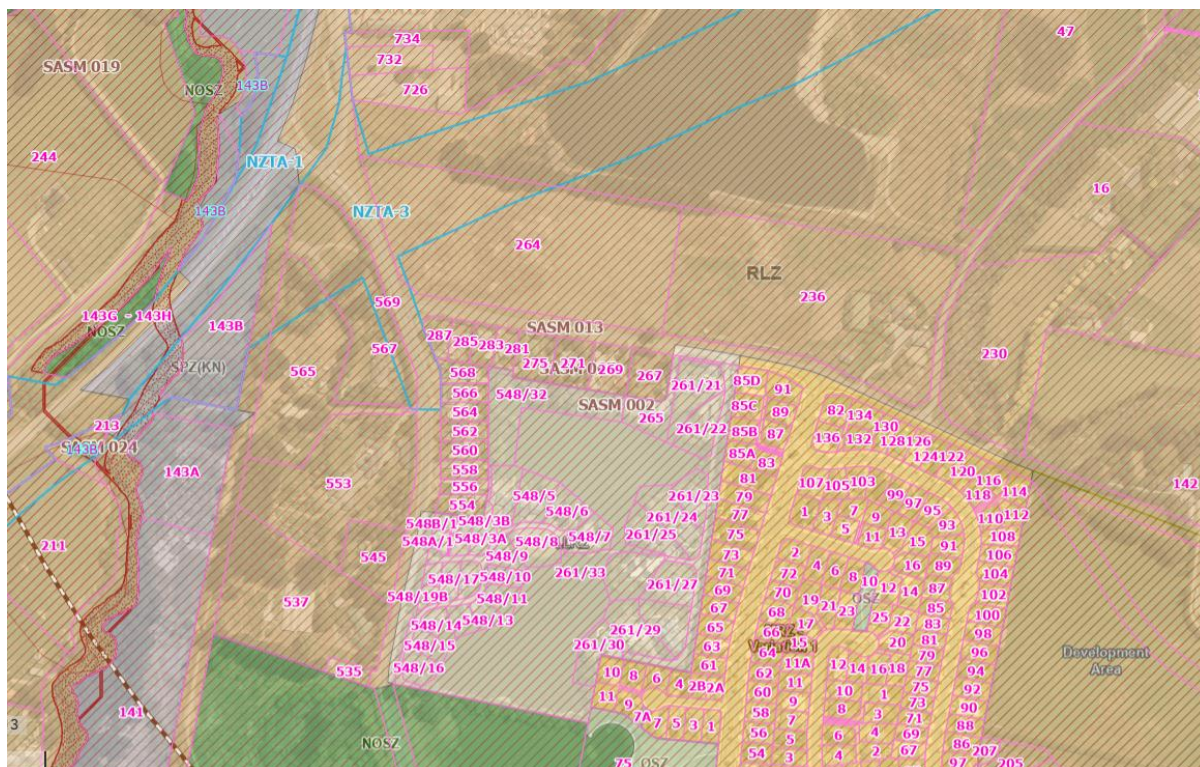


Figure 77 East side of Williams Street, north of Kaiapoi Lakes

933. Darren Waine [31.1] requests to rezone the east side of Williams Street (north of the lakes) to allow subdivision, noting that the west side of Williams Street is zoned as rural but the east side is not quite one or the other.

934. I note that the properties on the eastern side are a mixture of LLRZ, and small residential-type lots, but which are still zoned rural. The submitter is correct in stating that the east side is “not quite one or the other”. The west side is rural.

935. If the site is where I suspect it is, it is:

- Currently zoned in the operative district plan as rural;
- Proposed in the PDP as rural lifestyle;
- Inside the projected infrastructure boundary, as set out in Map A of the CRPS;
- Inside the shaded areas within Map A, CRPS; and,
- Part of the site is designated for an interchange following construction of the SH1 Woodend bypass.

12.2.2 Assessment

Natural hazards and geotechnical

936. Mr Aramowicz comments:

- *The applicant has not provided any technical evidence, nor an ODP, nor an address of the properties at which relief is sought. Regardless, I comment on information that is known or available to me.*
- *I am aware that the area that is immediately east and west of Williams St contains several former gravel pits that are now lakes. This confirms the area is most likely to be underlain by a medium dense to dense sandy gravel.*
- *Given the presence of sandy gravels, the land is unlikely to have a high risk of liquefaction.*
- *The land further east is much lower in elevation and is subject to a high flood hazard. Given the nature of the topography and flood hazard, I suspect the lower-lying land further west is likely to have moderate to high risk of liquefaction and is therefore unsuitable for development.*
- *There are some area of medium flood hazard in the area where relief has been sought, however, these do not appear to be associated with any overland flow paths.*
- *Taking the topography and flood risk into account, I consider the areas immediately west of Williams St (specifically 537, 553, 565, 567 Williams St and 110, 115, 133, 137, 137B, 141, 143A Old North Rd and 77 Crinan St) can be developed in a manner that avoids or mitigates the risk of natural hazards (specifically inundation).*
- *Filling is likely to be required for some properties in order to eliminate or reduce the existing medium flood hazard that is present in some areas. I consider it is unlikely the filling of the medium flood hazard areas will have an adverse effect to surrounding property.*
- *Given this I consider the addresses I have listed above are not likely to be subject to any significant natural hazard or geotechnical conditions that cannot be addressed as a condition of subdivision consent.*

Stormwater

937. Mr Aramowicz comments:

- *Given the nature of the geology, it may be possible to dispose of treated stormwater into ground. In summary, there are unlikely to be significant stormwater constraints that would prevent the proposed land use.*

Wastewater

938. Mr Aramowicz comments:

- *Servicing is achievable. It can be done, but there is cost associated the submitter/developer will need to meet. In summary, there are no known significant wastewater constraints that would prevent the proposed land use.*

Potable water

939. Mr Aramowicz comments:

- *Servicing is achievable. It can be done, but there is cost associated the submitter/developer will need to meet. In summary, there are no known significant wastewater constraints that would prevent the proposed land use.*

Conclusion

940. *There are no significant constraints that relate to natural hazards, geotechnical conditions, or the ability to provide stormwater, wastewater and potable water services to the site that would prevent the proposed GRZ land use.*

Transport:

941. Mr Binder comments:

- *In order to preserve the operational priority of a Strategic Road and minimise safety risks from turning traffic, I generally do not support creation of any additional accesses onto Williams St and would further support access consolidation.*
- *I note that The Lakes chiefly has privately-maintained ROWs and would counsel caution before additional subdividing is encouraged with access via private roads.*
- *I note that Lees Road will require substantial urbanisation - carriageway widening, footpath, kerb and channel, illumination, street trees, etc.*

Greenspace:

942. I did not seek specific greenspace or urban design advice in respect of this proposal, as there was no specific submissions or evidence from the submitter to respond to, or an ODP within the PDP to assess.

Submitter expert evidence

943. The submitter did not provide expert evidence to support his submission

Discussion

944. I note no significant technical constraints in rezoning the sites.

945. I also do not consider that there are any substantial policy constraints, and agree in principle that the zoning in the area requires addressing, as it does appear inconsistent.

946. The difficulty I have in recommending rezoning currently is:

- The lack of an ODP for the area, particularly on the transport issues as Mr Binder raises.
- The lack of landowner submissions outlining their interests and issues.
- The potential lack of scope from the Proposed Plan, which does not propose rezoning in this area
- The potential for noise and traffic issues in respect of SH1 and the proposed interchange, which affects the northern part of the site.

947. I consider that of these issues above, the potential noise and traffic issues from the motorway realignment would be determinative on the appropriateness of a future residential zone in the

area, and that lacking evidence on this from the submitter, I cannot make a recommendation to rezone at this time.

948. I thus recommend rejection of this request for rezoning.

949. I note that the zoning in this area of Kaiapoi does require addressing, perhaps after or as part of the construction of the Woodend bypass.

12.2.3 Recommendations

950. That the following outcome for submissions occurs:

- Darren Waine [31.1] is **rejected**

12.2.4 Plan-enabled capacity arising from these recommendations

951. I have not assessed the potential plan-enabled capacity arising from these recommendations.

12.2.5 Amendments

952. I recommend no changes to the Proposed Plan from recommendations in this section.

12.3 Kaiapoi development area

12.3.1 Matters raised by submitters

953. The area is:

- Currently zoned in the operative district plan as rural;
- Proposed in the PDP as rural lifestyle.
- Inside the projected infrastructure boundary, as set out in Map A of the CRPS.
- Inside the shaded areas within Map A, CRPS.
- Inside the Kaiapoi new development area.

954. David Colin, Fergus Ansel Moore, Momentum Land Limited [173.1, 173.2] seek to rezone the land under the Kaiapoi Outline Development Plan as general residential density with the exception of a small area at 310 Beach Grove which is proposed as Medium Residential Density, however the underlying existing 'Rural Lifestyle' zoning and certification process creates uncertainty and risk for developers as there is no certainty of development capacity until the certification process has been completed and the 'appropriate zoning' is determined by Council. Instead a 'Medium Density Residential' zoning is considered appropriate. The land is adjacent to existing development, with physical connections enabled to both transportation and infrastructure routes. They also seek to rezone the land subject to this submission to Residential Medium Density, to allow for a density of development that is consistent with adjacent residential land, and also:

- Amend the Kaiapoi Outline Development Plan to show the 'Residential Medium Density' Zone location.
- That the above rezoning to Residential Medium Density be undertaken in advance of the certification process.
- Retain the enabling policy for Retirement Villages in Residential Zones.

955. This is opposed in a further submission from CIAL [FS 80].
956. The Moore's are the landowner for the Momentum development.
957. Suburban Estates Ltd [208.1] request to rezone the submitters' land in the northern portion of the Kaiapoi development area from RLZ to GRZ.
958. Survus Consultants Ltd [250.7] seek that the Kaiapoi development area be rezoned for urban development in order to achieve sustainable growth and development of the district.
959. This is supported with a further submission from Momentum Land Ltd [FS 63].

12.3.2 Assessment

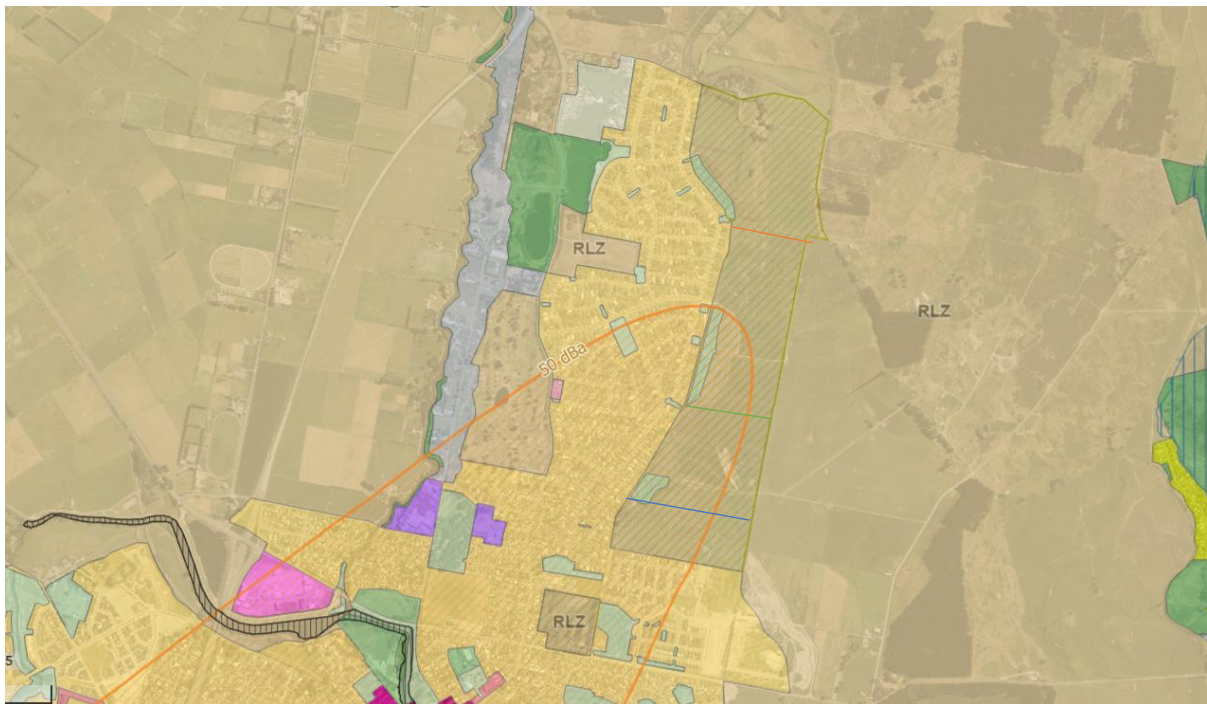


Figure 78 Kaiapoi Development Area

960. The map is of the Kaiapoi Future Development Area. It shows the following:
- The green line is the extent of the Momentum submission and rezoning proposal. They wish to rezone the land between their existing Beachgrove subdivision and the green line.
 - The blue line is my understanding of the extent of the greenfield priority area as set out in Map A, for Beachgrove. It is separate from the FDA, and may be incorrectly mapped as within the FDA.
 - The orange line in the top of the block is the southern extent of the Suburban Estates development.
 - The middle part of the block has no current active developer, but is subject to submissions requesting it to be rezoned.
 - About one third of the northern block and all of the southern block is subject to the 50dBA airport noise contour, in Map A, CRPS.

961. Momentum Projects Limited is the primary developer in the southern half of the northern block and on the southern block (up to the green line). Suburban Estates Limited is the developer for the northern half of the northern block (down to the orange line)
962. Momentum are the current developer of the Beachgrove development to the south, which I understand is approaching its last stage. Beachgrove was/is a LURP action and greenfields priority area in the context of the CRPS.
963. For Momentum, Mr Allan states that the proposal will generate 1000 dwellings, at densities of between 20-30 households/ha¹¹⁴.
964. I note that the Beachgrove development, to the south of this land, has achieved an average density of 350m², so the densities proposed for Momentum appear similar.
965. The FDA area was added to the CRPS through Change 1 to the RPS in 2021, following a substantial structure planning exercise by the Waimakariri District Council to identify greenfield areas for future growth.
966. The engineering advice below covers both the northern and southern blocks. I note that Momentum have provided evidence I consider to be approaching a subdivision consent standard, whereas Suburban Estates have not provided technical evidence.

Natural hazards

967. Mr Aramowicz comments:

- *Both s173 and s208 sites are within an area where the modelled flood depth exceeds 1m in a 200yr Coastal Inundation event, but only a small part of the s208 exceeds 1m depth. Refer the areas of s173 and s208 highlighted on the following excerpt from the Coastal Inundation flooding map;*

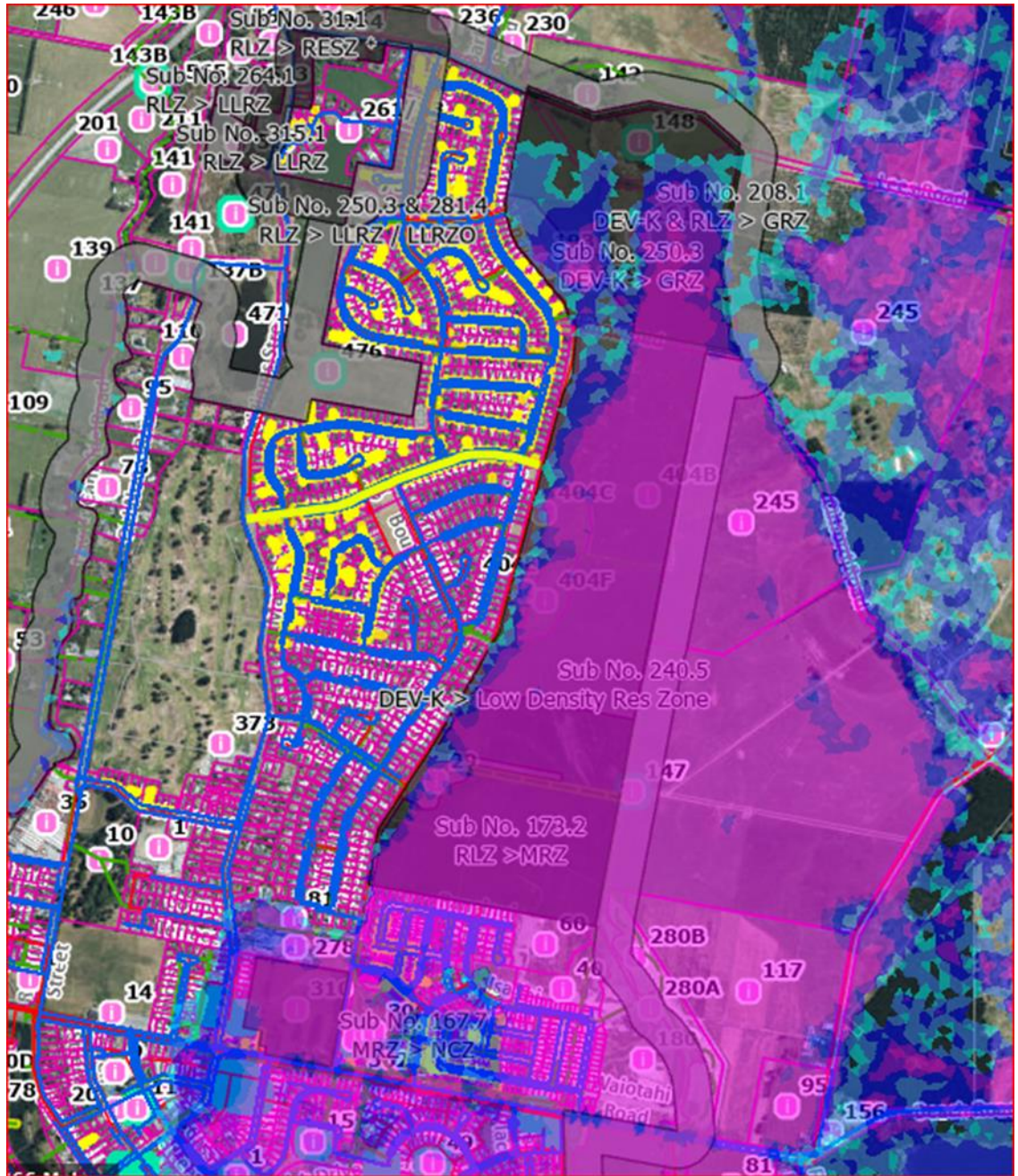


Figure 79 WDC flooding for the Kaiapoi FDA

- Council is aware of the increase in predicted peak flood levels that T&T identify will arise from development of the s173 site. Assuming a similar effect will arise from the s208 site, it is possible that the cumulative increase in flood height could be such that additional existing dwellings in Kaiapoi could be inundated. Council is aware that development of these areas is likely to occur over a number of years, during which it is reasonable to expect further modelling can be done to assess the cumulative risk, and where appropriate, to identify works that can be undertaken to mitigate or reduce the flood hazard.*

Geotechnical

968. Mr Aramowicz comments:

- *In relation to the existing ground conditions, T&T indicate that without ground improvement/earthworks, the s173 site would be TC3 (high risk of liquefaction). T&T proposed perimeter ground improvement to mitigate the risk of lateral spreading towards swales, and for placement of compacted fill with geogrid reinforcement, to reduce the risk of liquefaction-induced damage to shallow foundations. T&T also identify that preloading of the s173 site will be required to mitigate the risk of consolidation settlement. I agree that ground improvement and monitoring are common.*
- *In relation to the s208 area [Suburban Estates], geotechnical conditions are likely to be better than those at s173 [Momentum]. It is expected filling of the s208 site will be required to mitigate the risk of inundation and to achieve satisfactory conditions that can support shallow stiffened TC2 type foundations for future residential dwellings.*

Stormwater

969. Mr Aramowicz comments:

- *T&T have calculated the flood storage volume needed for attenuation of SW runoff, and assumed a wetland SWMA system will be provided for treatment of stormwater runoff. I agree that a wetland system is appropriate for treatment of stormwater runoff from the site.*
- *A similar system is likely to be require for treatment and attenuation of SW runoff from the s208 site.*

Wastewater

970. Mr Aramowicz comments:

- *The submitter for the s173 site has demonstrated how to convey WW to the Council network, and there is provision in the LTP for WW capacity to service the proposed development. In summary, there are no known significant constraints that would prevent the proposed land use.*
- *The ODP provided in the application for s208 identifies a wastewater pump station, and therefore, it is assumed it is intended that provide a gravity wastewater network draining to a pump station that discharges to a suitable location within the WDC network.*

Potable water

971. Mr Aramowicz comments:

- *There is provision in the LTP for capacity to service the proposed development at the south block (KAG08) in yr0-3 and the north block (KAG10) in yrs11-20. In summary, there are no known significant water supply constraints that would prevent the proposed land use.*

Summary

972. *Application sites s173 and s208 have a risk of subsidence from deposits of soft alluvial sediment, a moderate to high risk of liquefaction, and a moderate to high flood hazard from both an Ashley River breakout event and from coastal inundation with a mean sea level of 1.0m. These hazards can be mitigated by ground improvement and filling of the site to a suitably high level.*

Transport

973. Mr Gregory has reviewed the evidence of Mr Carr and makes the following overall comments:

- *Ability of public transport to service the subdivision, including the design of an ODP which maximises catchment and futureproofs opportunities to develop the catchment into future development stages of northeast Kaiapoi.*
- *The intersection of Beach Road / Tuhoë Avenue, and delays in the morning peak (including delays to future public transport services), and the greater vehicle flows using Tuhoë Avenue than Beach Road, possibly suggesting need for change in intersection priority.*
- *Capacity of Williams Street / Beach Road roundabout, and the likelihood of signals being required.*
- *Public transport services would require accommodation in the design of the spine road, as well as an ODP which would provide the connectivity required to deliver public transport walkable catchments. An outcome of 90% of dwellings within the public transport catchment is a requirement of the operative District Plan. The public transport route has capacity to service commuted trips to Christchurch city, noting that half of Kaiapoi residents commute to Christchurch city.*
- *I therefore conclude that the ODP should be developed to accommodate public transport. This would also include measures to resolve delays on Tuhoë Avenue, which would also impact on public transport vehicles.*
- *In my opinion, the Williams Street / Beach Road intersection should be signalised. The evidence of Mr Carr considers a range of possible development outcomes (and subsequent development traffic), and he recommends network mitigation scaled to each outcome. However, I specify reasons why I consider that the minimum mitigation would not be effective, and further that a threshold for signals would likely occur at a point of increased demand which would be far lower than that generated by the maximum development outcome.*
- *In my opinion, a development outcome mid-way between minimum and maximum would likely require generate the need for signals, and this should be tested in modelling.*
- *Further consideration should be given to northeast Kaiapoi, and the possible need for designation to support intersection upgrades. Staging of the development and infrastructure should be planned concurrently.*

974. For the wider development area, Mr Gregory notes:

- *I would support an assessment which commits to safeguarding and developing a north-south public transport corridor, and achieving 90% of development within the public transport catchment which at least meets the operative plan requirements. I would further support inclusion of walkable neighbourhood centres, and delivery of a quality active travel connection to Kaiapoi town centre.*
- *Intersection upgrades, such as the Williams Street / Beach Road intersection should be identified. The outcome for submission #173 – which was for approximately one third of the traffic which could occur under this submission – was a signalised intersection, contained within the road boundary. In my opinion, there is a possibility that a larger*

intersection could be required if the rezoning sought in submission #208 was also granted, and this will require appropriate consideration, including use of a strategic network model.

- *In conclusion, strategic planning to develop quality multi-modal transport outcomes within the ODP (and surrounding improvements) will be the key to achieving an efficient and well-functioning transport outcome.*
- *In summary, there is a risk of subsidence due to the presence of soft alluvial soils. There is also a moderate to high risk of liquefaction. Regardless, there are geotechnical solutions that can be used to reduce the risk of these hazards occurring. While there are areas of low-medium flood hazard associated with a large overland flow path that crosses the site, based on existing WDC flood hazard modelling and the submitter's submission, I expect that with careful engineering, the effect to downstream property from any additional stormwater runoff from a future subdivision can be largely mitigated using onsite attenuation.*

Greenspace:

975. Mr Read comments:

- *In the event of a zone change and residential development of land subject to the Momentum and Suburban Estates submissions, provision of neighbourhood park greenspace is already anticipated by the applicable Structure Plan and proposed Outline Development Plan. Depending on residential density, the two parks proposed may not be adequate to meet Council's level of service requirements for neighbourhood park provision. Any required increase can be achieved by enlarging the proposed park sites, or via the addition of a further park within the proposed ODP area. Requirements can be calculated by referencing Waimakariri District Council's level of service requirements for neighbourhood park access in urban and suburban areas. This requires most residents to be within 500m, or a 10-minute walk, of a neighbourhood park; and 1.0ha of park space to be provided per 1,000 residents (approx. 420 dwellings). In addition, the minimum viable size for a neighbourhood park is 0.3ha.*
- *The priority location for parks is close to medium density areas and within required access distance of general residential sites. Connectivity with a road frontage and green off-road linkage networks is advocated. Community connection to an enhanced McIntosh Stream corridor will be important in activating recreational opportunities and environmental enhancements that promote community development and interaction.*

Cultural advice

976. Council sought advice from Mahaanui Kurataiao Ltd on behalf of Ngāi Tūāhuriri Rūnanga for this specific proposal on two occasions.

- Preliminary advice in 2020, during the structure planning process for the area and as part of Change 1 to the CRPS. The 2020 advice stated that Runanga were "not opposed to the residential designations taking effect, subject to recognition and protection measures being put in place for freshwater".
- Further preliminary advice in 2024, prior to the writing of this s42A report additional cultural advice was received. This states that "Te Ngāi Tūāhuriri Rūnanga are opposed to the rezoning of Area 4 — Kaiapoi Development Area. The scale of the proposed rezoning

area is considerable, and the site is within a culturally sensitive area. This is identified by the SASM002 and SASM013 overlays within the District Plan. The site is also within the Ashley Estuary (Te Aka Aka) and Coastal Protection Zone. The area is identified as a historical wetland area within Black Maps and many wetland type features and waipuna (springs) have been lost due to the development that has occurred adjacent to this area. These features provide habitat for indigenous/taonga species and are remnants of the pre-European landscape”

- Te Ngāi Tūāhuriri Rūnanga have stated that they consider themselves to be an affected party on the rezoning.

Greenhouse gas emissions

977. On behalf of Council BECA is reviewed the GHG evidence provided by the submitter on 2 July 2024. This may require a supplementary s42A, or be addressed at the hearing.

Applicant evidence

<u>Person/Organisation</u>	<u>Evidence type</u>
Mr Brian Putt	Planning (3 May 2024)
Mr Mark Allan	Planning (9 May 2024)
Ms Anna Sleight	Geotech
Mr Mark Morley	Contamination
Mr Geoffrey Dunham	Soils
Mr Manu Miskell	Infrastructure
Mr Andy Carr	Transport
Mr Bruce Weir	Urban Design
Mr Danny Kamo	Landscape
Mr Richard Brunton	Flooding
Mr Fraser Colegrave	Economics
Ms Annabelle Coates	Ecology
Mr Robert Wilson	Greenhouse Gas Emissions

Discussion

978. I met with consultants for the submitter Mr Chris Fowler, Mr Mark Allan, and the developer Mr Shane Fairmaid, on Tuesday 19 March 2024 in regard to the submission following the receipt of their evidence. I advised them of the potential requirement, arising from discussions with Mr Jolly, to add an additional neighbourhood park in the southern part of the development.

979. The Kaiapoi FDA is a future development area as set out in Map A, CRPS. It is currently zoned as rural in the Operative Plan, and proposed for rural lifestyle in the notified Proposed Plan, in absence of any rezoning submissions. There is land in the middle of the northern block owned by Christine Susan Curry, John Joseph Ryan, Joseph Patrick Ryan, Mary Anne Brown, Michael John Ryan, Susan Patricia Giles, and also in the area of the Suburban Estates submission owned by John William Wakeman and Jane Patience Wakeman who have not submitted on the PDP. The Moores, in the southern part of the block and the small southern block are joint submitters with the developer.

980. There appears to be considerable alignment amongst the expert advice received by Council and that received from the applicants, with the differences appearing to be of a technical rather

than strategic nature, and what I would consider would be of the nature of the input that occurs into a subdivision consent process.

981. My understanding is that the concern may be related to the potential presence of springs on the land.
982. I consider that the two primary issues associated with the Kaiapoi FDA are flooding and airport noise. I discuss each of these below:

Flooding

983. The experts agree that the area currently has a high degree of flood risk. However, the experts also agree that the risk can be mitigated through raising of the land, much as occurred with the Beachgrove subdivision. The degree of land raising is substantial, between 1.5m-3m, but the evidence from the submitters outlines that this is feasible, given the close source of gravel from the Waimakariri River. The Beachgrove development itself shows that it is feasible.
984. The displacement modelling by Mr Brunton shows some displacement occurring as a result of the developments, particularly flowing south and east through the Kaiapoi Reserve, but that the additional effects of this over and above the amount of water that the area would already receive in a flood event are minimal. Council experts have agreed with this assessment.
985. I note that the flood risk in the area is that of ponding, or static rising water levels, rather than the velocity breakout flow that other parts of the District are exposed to. Mr Bacon notes the difference as follows:
- *I also note that the dynamics of the flood hazard in West Rangiora is very different to the flood hazard in Northeast Kaiapoi. In the Northeast Kaiapoi area the flood hazard on the undeveloped land has been assessed as 'High' and is predicted to have much higher flood depths than those predicted in the West Rangiora area from the Ashley Breakout. The flood hazard in West Rangiora is largely due to fast moving water with moderate flood depths. However the flood hazard in Northeast Kaiapoi is largely due to deep ponding water with very low velocities from a combination of Localised Rainfall and Coastal Inundation.*¹¹⁵
986. As I understand it, velocity flow presents more of a risk to life, whereas slow moving ponding water presents more of a risk to property. However, regardless of the specific nature of the risk, if the area was to remain as high hazard without expert evidence suggesting it could be addressed, I could not recommend it be approved for rezoning under CRPS policy 6.3.12. However, the expert evidence presented shows that this risk can be reduced to low through land raising, and as such, I consider that this requirement of the CRPS can be met.
987. The area is also coastal, and sea level rise may be an issue that needs further understanding in order to finalise the level of fill required. An important component of this assessment would be understanding the nature of vertical land movement in the area, if it exists. Experts have assessed sea level rise based on current Council modelling of risk, but I consider that any subdivision consent process should take into account any updates to sea level rise assessments, an understanding of vertical land movement, and their likely timeframes, as per the advice of Mr Aramowicz.

¹¹⁵ Memo of 12 July 2024 to Peter Wilson from Chris Bacon

988. I note that in any modelled flooding scenarios, these newer development that involve land raising are likely to be considerably better off than the older parts of Kaiapoi. For instance, Sovereign Palms, to the west, is of low risk due to the land raising that occurred there, as well as being on slightly higher ground.

Airport noise

989. I discussed this issue in detail in my hearing stream 10A report. I summarise the issue here in the context of rezoning. Part of the Kaiapoi FDA is subject to the 50dBA airport noise contour. CRPS Policy 6.3.5(4) controls development under this contour, in order to avoid reverse sensitivity effects on Christchurch International Airport. "Existing residentially zoned urban areas, residential greenfield area identified for Kaiapoi, or residential greenfield priority area identified in Map A" are identified as exclusions from the overall prohibition on new development under the 50dBA contour. There is considerable contention on the nature of the "Kaiapoi exemption" as I framed it in my previous s42A report.

990. I restate my recommendation from that report that I consider that the Kaiapoi exemption applies to all of the Kaiapoi FDA underneath the operative 50dBA contour, as the terms "greenfields" is used throughout the CRPS as a collective category for greenfields priority areas and FDAs. Therefore, I consider that the FDA is exempt from the prohibition in 6.3.5(4).

991. I also note that as part of the site is a greenfields priority area (up to the blue line in the map above) this would meet the greenfields priority area exemption in the policy already.

992. However, I note my application of policy interpretation approach 2 which requires an assessment of the proposal against the NPSUD, before then applying the aspects of the CRPS that give effect to the NPSUD. I consider that the Kaiapoi FDA, and the requests to rezone it provide significant development capacity and contribute to a well-functioning urban environment under Policy 8. I consider that the CRPS gives effect to, and describes what a well-functioning urban environment is, in the Greater Christchurch context.

993. Policy 8, and the other responsive planning provisions in the NPSUD enable the consideration of development proposals on their merits, stepping outside of any prohibitive or avoidance 'urban limit' provisions in lower order documents¹¹⁶. The responsive planning provisions were designed to step outside urban limits, however, in doing so, as I have stated elsewhere, I consider that any such provisions still have strong weighting, they just no longer require avoidance.

994. The provisions in 6.3.5(4) that prohibit development underneath the 50dBA contour can be reconsidered in their weighting with an NPSUD interpretation. Under such an interpretation, I do not consider there is any spatial prohibition on the siting of new development under the 50dBA contour, instead, the requirement shifts to avoiding the noise effects in buildings within the development. I understand that acoustic experts in their hearing 10A JWS have stated they consider that noise levels in buildings, existing and modern, would achieve 40 dBA indoors with windows ajar.

995. I note that this is also the approach taken to airport noise in the draft CRPS, which is now subject to first schedule consultation. I note that I reached my policy conclusions prior to its release.

¹¹⁶ I do not think for instance that the responsive planning provisions allow natural hazard provisions to be down-weighted for instance.

996. Thus I consider that under either interpretation, and potentially both of the interpretations together, the requirements of 6.3.12(3) to achieve 6.3.7 (the noise provisions) would be met, and the area can be rezoned as residential.

Overall consideration

997. Manawhenua have outlined that they are opposed to the development and consider themselves to be an affected party. I do note the change in advice from what was received during the drafting of Change 1 and the PDP, and what was received in 2024 prior to the writing of the s42A.

998. Regardless of what occurs with the current communication between Council and runanga, I note that the concerns are related to freshwater aspects of the design and the two SASMs, or silent file areas.

999. I do not consider the area to be substantially different in size or nature from the other development areas where rezoning is recommended to occur, provided that the Ngai Tahu freshwater policy is carefully adhered to in consenting and design.

1000. I also note that whilst there were likely a number of wetlands on the site, these are not present currently¹¹⁷ and would have likely been lost at the time McIntoshs Drain, which drains about 1500 hectares north to Woodend, was built¹¹⁸. The features would likely return if McIntoshs Drain was to be filled in, however, given the drainage services it provides to a large catchment, I do not consider this to be practical or possible. I note that McIntoshs drain is not currently listed as a SASM.

1001. Instead, I consider the better option is to ensure that a requirement of the rezoning, and any development that follows it, is to enhance the McIntoshs Drain corridor, and potentially provide additional wetlands, perhaps as part of stormwater design. I understand that this is what is occurring at Beachgrove.

1002. I also recommended a detailed ecological survey of all of the land, identifying spring features, or where they may once have been.

1003. In this regard, I note that the subdivision standards matters of control and discretion SUB-MDC13 and SUB-MDC7 provide a mechanism by which iwi are treated as an affected party at subdivision consent stage. Iwi are not a submitter on the specific rezoning submission, but I am conscious of ensuring a statutory process for their involvement.

1004. I note the relatively high standard of the evidence provided by the submitter for Momentum, and the lack of any specific technical issue. The evidence appears to be more of design discussions that I consider are best resolved through a subdivision consent process.

1005. Scope for the potential rezoning is as follows:

Submitter	Number	Land Included in submission	Zoning sought
David Colin, Fergus Ansel Moore,	173.1, 173.2	Rezone the land under the Kaiapoi	“as general residential density with the

¹¹⁷ Para 54, 64, Ms Annabelle Coates, EIC

¹¹⁸ McIntoshs Drain was built prior to 1900

Momentum Land Limited		Outline Development Plan	exception of a small area at 310 Beach Grove which is proposed as Medium Residential Density”
Suburban Estates Ltd	208.1	The submitters’ land in the northern portion of the Kaiapoi development area	“from RLZ to GRZ”
Survus Consultants Ltd	250.7	Kaiapoi development area be rezoned for urban development in order to achieve sustainable growth and development of the district.	“Rezoned for urban development”

1006. I consider there is scope to consider rezoning the area, to either general residential or PDP medium density residential. Suburban Estates have sought rezoning of the top third of the area, Momentum have sought rezoning of the whole of the Kaiapoi FDA ODP. Survus Consultants Ltd have sought rezoning of the whole Kaiapoi FDA as well.

1007. Apart from Survus, and Momentum in respect of 310 Beach Grove, general residential was sought. Survus sought that the area was rezoned for urban development. In respect of the specifics of the Momentum ODP, I do note that the 500m2 allotment size for general residential would result in some of the allotments sought by Momentum becoming a non-complying activity.

1008. Momentum have supplied a detailed ODP and design in their evidence, however as I stated above, I consider this to be of a standard required by a subdivision consent process, rather than the requirement for a higher-level ODP for rezoning (as per CRPS 6.3.3). Suburban Estates and Survus have not supplied ODPs, however, the PDP contains one, and Council’s experts, along with Momentum’s experts (for the bottom third) have not identified substantial issues with it that would necessitate amendment.

1009. I consider that the notified ODP for the area meets the tests required of such ODPs in CRPS 6.3.3, and as such I can recommend rezoning the area to PDP medium density residential.

12.3.3 Recommendations

1010. That the following outcome for submissions occurs:

- The Further submission from CIAL [FS 80] is **rejected**
- David Colin, Fergus Ansel Moore, Momentum Land Limited [173.1, 173.2], Suburban Estates Ltd [208.1], Survus Consultants Ltd [250.7] are **accepted**
- Further submission Momentum Land Ltd [FS 63] is **accepted**

12.3.4 Plan-enabled capacity arising from these recommendations

1011. I consider the following plan enabled capacity arising from these recommendations:

- I consider this to be an anticipated urban environment, as it is within the shaded areas of Map A, CRPS.
- The north block is 101 ha overall. The south block is about 6ha.

Momentum North Block

- The north block Momentum land is about 36ha
- I assume that reserve requirements across the site will be between 20 and 30%, noting that the higher reserve requirement for Beachgrove was primarily for stormwater management areas that also provide capacity for some of the rest of the block. I have assessed it at 30%.
- Applying a 600m² lower bound allotment size, and a 200m² full MDRS upper bound scenario, this results in a plan-enabled capacity of 720 at 600m², of 1260 at a full MDRS scenario of 200m², and 840 as an average scenario.
- I note the submitters statements of achieving 1000 dwellings.

Momentum South Block

- The south block Momentum land is about 6ha
- I assume that reserve requirements across the site will be about 10%, as it is a contained and constrained site that does not require additional reserves, apart from roads and some internal drains.
- Applying a 600m² lower bound allotment size, and a 200m² full MDRS upper bound scenario, this results in a plan-enabled capacity of 90 at 600m², or 180 at a full MDRS scenario of 200m², and 270 as an average scenario.
- I note that if, as has been proposed in the past, this site develops as a retirement village, these densities will be higher.

Rest of North Block

- The remainder of the north block, including the Suburban Estates land, is about 65ha. Applying similar reserve requirements to the Momentum south block, but upping them slightly to 40% to handle additional stormwater management areas and parks as required, a scenario of 600m² results in 2564 additional houses, 200m² of 7692 additional houses, and 5218 as an average.

12.3.5 Amendments

1012. That the planning maps for the Kaiapoi Development area are amended to show all of the north block and south block zoned as PDP medium density residential.
1013. Amend the ODP in DEV-K-APP1 to require an additional neighbourhood “pocket” park in the southern part of the ODP for the Momentum North Block.
1014. An ecological survey of land for springs and other freshwater features to occur as part of subdivision consent.

12.4 New south Kaiapoi development area

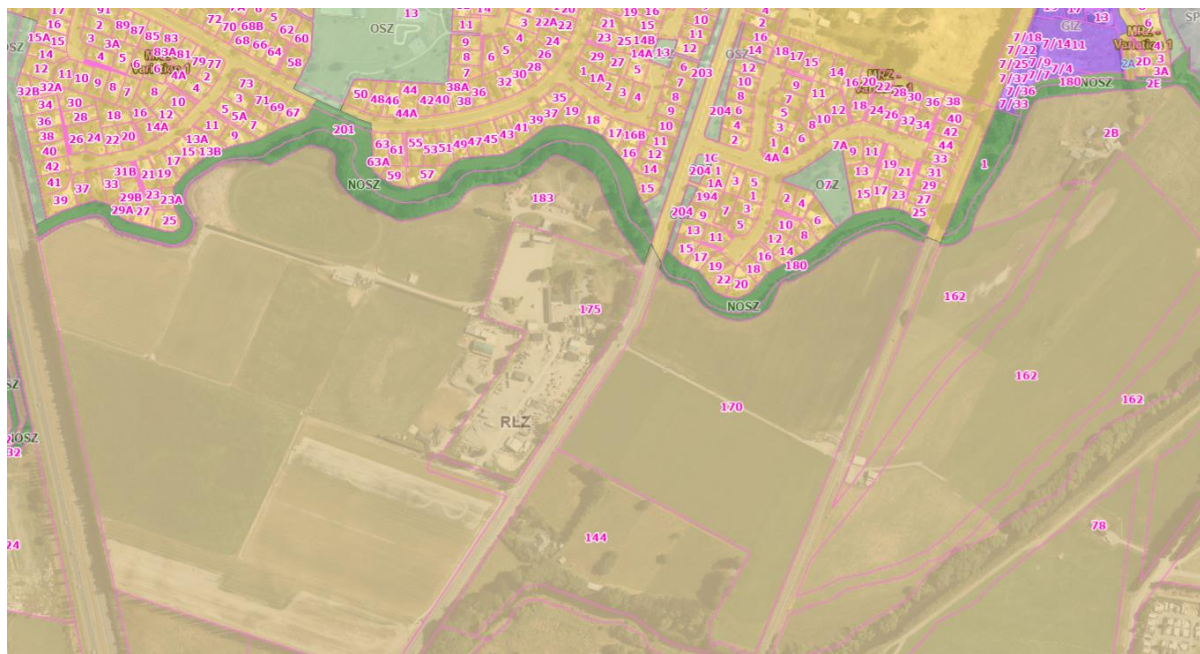


Figure 80 Proposed South Kaiapoi Development Area

12.4.1 Matters raised by submitters

1015. Mike Greer Homes [332.1,332.2] requests to add a new residential development area (about 10.3ha) within the south of Kaiapoi, entitled as the South Kaiapoi development area (SK), to yield 200 lots. The land in question is:

- Pt RS 37428 (CB701/7) limited to the land to the west of the Main Trunk Railway Line
- RS 39673
- Lot 1 DP 19366

1016. This is opposed in a further submission by CIAL [FS 80].

1017. W and J Winter and Sons Ltd [257.1,257.2] request to include 10ha of the submitters' property between Williams Street and Kakinui stream railway line within the future development zone / rezoned medium density residential zone. This is the following land:

- 170 Main North Road part of (10ha Williams Street railway line section)
- 144 Main North Road

1018. This is opposed in a further submission by CIAL [FS 80].

12.4.2 Assessment

Natural hazards & Geotechnical matters

1019. Mr Aramowicz comments:

- *The south and east parts of the site are at med-high risk of inundation in a 200yr ARI event, and also from an Ashley River breakout event.*
- *The south and southeast parts of the site were subject to liquefaction and lateral spreading in the September 2010 earthquake, with land spreading into Courtenay Stream.*
- *The north and west parts of the site appear to be less susceptible to natural hazards.*
- *ENGEO confirm that many parts of the site have a medium – high risk of liquefaction, and a compounding risk of consolidation settlement due to the presence of soft, saturated alluvial soils.*
- *The DLS evidence confirms the site would need to be filled to avoid risk of inundation in a 200yr event. While this seems a reasonable approach, it is likely to contribute to an increased risk of lateral stretch and consolidation settlement at the site that will require mitigation.*
- *Further, the site is in the ‘orange’ part of ECan’s tsunami evacuation area prepared for civil defence purposes. Environment Canterbury note “The orange zone is less likely to be affected by a tsunami and includes low-lying coastal areas that are likely to be flooded in a large tsunami that inundates land”.*
- *The area downstream of the site that stormwater will flow into already has a high flood hazard, and appears to be influenced by the effects of coastal inundation. A rigorous flood risk assessment will need to be carried out to support a future application for subdivision consent to demonstrate how stormwater runoff from the site will need to be treated and attenuated to avoid adverse effects to downstream properties*

Stormwater

1020. Mr Aramowicz comments:

- *WDC agree that it is technically feasible to achieve onsite treatment, but the volume needed to attenuate peak flows and the rate at which treated stormwater that can be discharged to Courtenay and Kaikanui Streams can only be determined by hydraulic modelling of a future development. This could be carried out at time of application for subdivision consent.*

Wastewater

1021. Mr Aramowicz comments:

- *There is provision in the LTP for capacity to service the proposed development (KAG22) in yrs21-30 associated with the South of Kaikanui Supply Main Stage 2 works, forecast for yr 2052. Submitter identifies solution to construct developer-funded rising main to Parkham St pump station to service the site. There is sufficient capacity within the Kaiapoi WWTP for the proposed In summary, there are no known significant wastewater constraints that would prevent the proposed land use.*

Potable water

1022. Mr Aramowicz comments:

- *There is provision in the LTP for capacity to service the proposed development (KAG22) in yrs21-30, associated with the South of Kaikanui Supply Main Stage 2 works.*
- *In summary, there are no known significant water supply constraints that would prevent the proposed land use.*

Summary

1023. Mr Aramowicz comments:

- *There is a risk of subsidence due to the presence of soft alluvial sediments, a high risk of liquefaction and lateral spreading from earthquake shaking, and a high flood hazard from an Ashley River breakout event (albeit that there are technical solutions that can be used to overcome each of these hazards, such as by placing controlled, compacted fill and ground improvement, and careful hydraulic design and onsite attenuation of stormwater runoff).*
- *There is provision in the LTP for capacity to service the proposed development at the south block (KAG08) in yr0-3 and the north block (KAG10) in yrs11-20. In summary, there are no known significant water supply constraints that would prevent the proposed land use.*

1024. Mr Binder makes the following comments:

- *I consider that this site is relatively well-served by public transport (bus service on Main North Road) and cycling/walking (Main North Rd path is across from the site).*
- *I note comments on other sites around future capacity constraints at the Tram Road interchange will apply in this instance, given what I understand as a relatively high likelihood of cumulative effects at the interchange from all new development served by Tram Road on both sides of the SH1 corridor. However at this time, I do not have a quantitative upper limit to the Tram Road motorway interchange.*
- *While the proposed development scheme shows a “recreation reserve” between the site and Main North Road, I consider that some degree of urbanisation of the frontage will still be necessary, potentially including a walking/cycling facility, crossing points, street lighting, street trees, and kerb/channel, and possibly widening of the road reserve.*
- *The southern access should be moved from where shown. Cross-roads intersections are not recommended due to the higher risk of conflicts from turning traffic so I would recommend two staggered t-intersections (from the paper road opposite)*
- *Research has established a pretty strong correlation between New Zealand’s high rate of driveway run-over paediatric fatalities and shared accesses with limited green space. This applies to the north-east and south-west corners of the development – Lots 16-20, 21-23, 25-33, and 180-186. In general I would not support ROW-based urban form, especially where the section sizes are so small.*
- *It is also worth noting that a ROW by definition poorly provides the functions of a road – on-street parking, street trees (with stormwater attenuation, pedestrian shading, heat island dissipation, and speed slowing effects), separated footpaths, street lighting, and sufficient sightlines – so properties that are accessed by ROWs receive a lower level of service.*

Greenspace:

1025. Mr Read comments:

- *The overall level of green linkage reserve provision and associated connectivity is appropriate for a proposed medium density residential zone. In combination, the linkages provide landscape amenity and associated recreation benefits, along with the potential for revegetation and ecological enhancement of the Kaikanui and Courtenay Streams. The appropriate vested status of these sites can be confirmed at subdivision stage. Beyond boundary treatments, a well-designed amenity streetscape will be critical in breaking up the built-form dominance of the development's interior. This is a level of service requirement for Council streetscapes.*
- *The proposed recreation reserve (neighbourhood park) in the north of the development is appropriately located in terms of setting but is under-sized based on Council parks level of service requirements for the proposed resident population. With the indicative residential lot overlay, it also has an unnecessary semi-private context. These issues can be resolved if the extended row of small residential lots is pulled back from the park space or otherwise redistributed to provide a more open and accessible feel to the neighbourhood park as a wider community destination. Council's requirement for neighbourhood park provision is most residents to be within 500m, or a 10-minute walk, of a neighbourhood category park; and 1.0ha of park space to be provided per 1,000 residents. Given lot numbers, this suggests a park space of approximately 0.4 to 0.45 hectares at this site...exclusive of the esplanade and rail buffer margins.*

Applicant experts

1026. The submitters provided the following advice:

<u>Person/Organisation</u>	<u>Evidence type</u>
Mr Brian Putt	Planning
Ms Patricia Harte	Planning
Mr Neil Charters	Geotech
Mr David Robotham	Contamination
Mr Geoffrey Dunham	Soils
Mr Jamie Verstappen	Infrastructure
Mr Matthew Collins	Transport
Mr Vikramjit Singh	Urban Design
Mr Rory Landbridge	Landscape
Mr Gregory White	Flooding
Mr Fraser Colegrave	Economics
Mr Robert Wilson	Greenhouse Gas Emissions
Mr William Reeve	Acoustic

1027. I note that the submission itself requests a new development area be created on this site, whilst the submitters' evidence focuses on a full rezoning. I assess both options.

Flooding

1028. I note the flooding and stormwater concerns raised by Mr Aramowicz, and the potential mitigation options raised by Mr Whyte, albeit with Mr Whyte raising the issue of potential

displacement flooding onto Main North Road as a result of infilling and earthworks on the site. I note that Mr Whyte in his evidence stated that he would be providing supplementary evidence to consider these effects, but at the time of publication of this report, such evidence has not been received.

1029. Both the downstream capacity to receive stormwater and any displacement effects on Main North Road are critical issues for both my consideration of the submission, and as I currently lack evidence on the downstream capacity to receive stormwater, and displacement on the road, I cannot assess this at this time. Thus, I cannot satisfy the requirements in CRPS 6.3.12 on the avoidance or mitigation of natural hazards.

1030. If evidence were to be received, I consider, as with other downstream receiving environment capacity issues that have emerged in assessing rezoning submissions, that I would also require planning or legal evidence on how any matters if they were of significance would be addressed prior to development beginning. This could be by way of a rule or other RMA mechanism.

Airport noise

1031. I discussed this issue in detail in my hearing stream 10A report. I summarise the issue here in the context of this rezoning. “Existing residentially zoned urban areas, residential greenfield area identified for Kaiapoi, or residential greenfield priority area identified in Map A” are identified as exclusions from the overall prohibition on new development under the 50dBA contour. There is considerable contention on the nature of the “Kaiapoi exemption” as I framed it in my previous s42A report.

1032. However, as this proposed area for rezoning or a new development area is outside of the areas listed in CRPS Policy 6.3.5(4), the policy overall requires that development that affects the efficient operation of the Christchurch International Airport is avoided. Whilst the criteria in 6.3.11 may provide for the creation of a new development area or rezoning outside of the shaded areas in Map A, 6.3.11(5)(h) probably links to 6.3.5 anyway, due to the requirement not to compromise the operational capacity of strategic infrastructure. The criteria in 6.3.12 for approving development within a development area explicitly references 6.3.5.

1033. Thus there is no pathway using the CRPS alone to recommend approving either a new development area or rezoning it.

1034. However, I note my application of policy interpretation pathway 2 which requires an assessment of the proposal against the NPSUD, before then applying the aspects of the CRPS that give effect to the NPSUD. I consider that the proposed Kaiapoi FDA, and the requests to rezone it would provide significant development capacity in the context of Policy 8 NPSUD.

1035. In the context of a well-functioning urban environment I consider that the flooding and airport noise aspects would be determinative on recommending it. I consider that the CRPS gives effect to, and describes what a well-functioning urban environment is, in the Greater Christchurch context.

1036. Policy 8, and the other responsive planning provisions in the NPSUD enable the consideration of development proposals on their merits, stepping outside of any prohibitive or avoidance ‘urban limit’ provisions in lower order documents¹¹⁹. The responsive planning provisions were

¹¹⁹ I do not think for instance that the responsive planning provisions allow natural hazard provisions to be down-weighted for instance.

designed to step outside urban limits, however, in doing so, as I have stated elsewhere, I consider that any such provisions still have strong weighting, they just no longer require avoidance.

1037. The provisions in 6.3.5(4) that prohibit development underneath the 50dBA contour can be reconsidered in their weighting with an NPSUD interpretation. Under such an interpretation, I do not consider there is any spatial prohibition on the siting of new development under the 50dBA contour, instead, the requirement shifts to avoiding the noise effects in buildings within the development. I understand that acoustic experts in their hearing 10A JWS have stated they consider that noise levels in buildings, existing and modern, would achieve 40 dBA indoors with windows ajar.

1038. Thus I consider that under either interpretation, and potentially both of the interpretations together, the requirements of 6.3.12(3) to achieve 6.3.7 (the noise provisions) would be met, and the area could either be rezoned as residential, or as a new development area.

1039. However as I stated above, I do not consider I have sufficient evidence to assess the flooding issue, and so at this time, I would recommend rejecting the application.

12.4.3 Recommendations

1040. That the following outcome for submissions occurs:

- Mike Greer Homes [332.1,332.2], W and J Winter and Sons Ltd [257.1,257.2] are **rejected**
- The further submission of CIAL [FS 80] are **accepted**

12.4.4 Plan-enabled capacity arising from these recommendations

1041. Although I have recommended rejecting this submission, I consider the following plan enabled capacity arising if this recommendation was to be accepted:

- I consider this to be an unanticipated urban environment, as it is outside the shaded areas of Map A, CRPS.
- It is about 10.3ha. I assume that reserve requirements across the site will be between 30 and 40%, noting the need for stormwater management areas.
- Applying a 600m² lower bound allotment size, and a 200m² full MDRS upper bound scenario, this results in a plan-enabled capacity of 103 at 600m², of 309 at a full MDRS scenario of 200m², and 206 as an average scenario.
- I note the submitters statements of achieving 200 dwellings.

12.5 West Kaiapoi / Silverstream

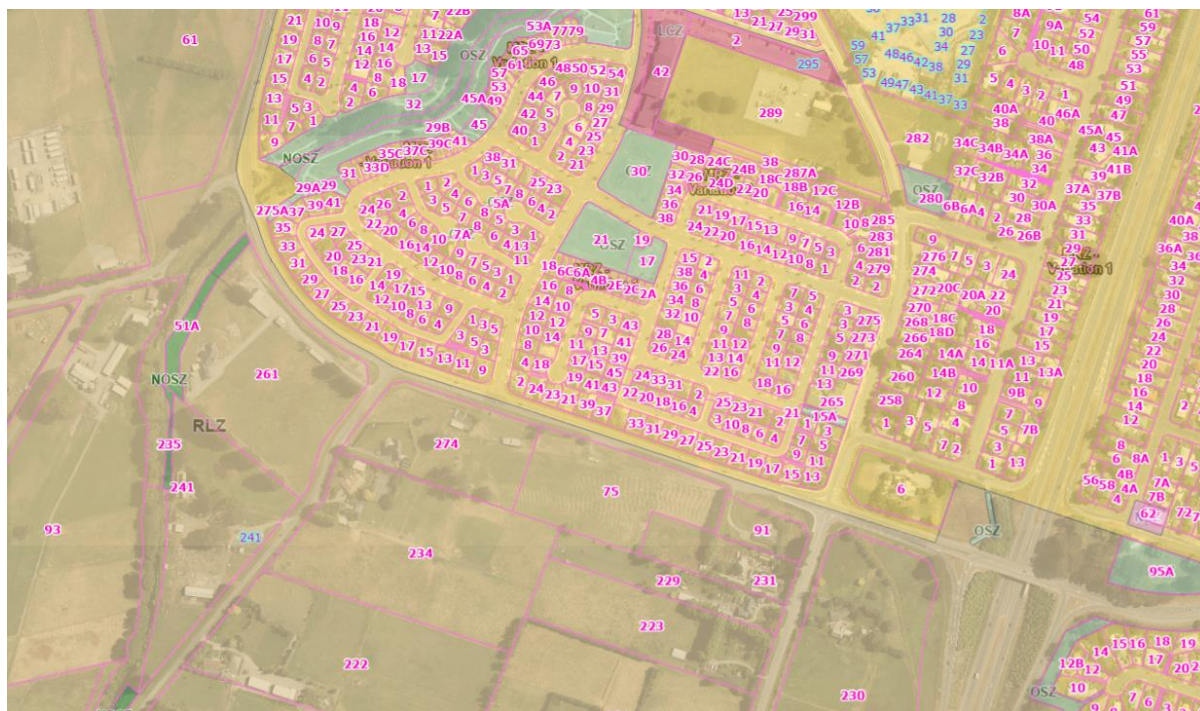


Figure 81 261 Giles Road

12.5.1 Matters raised by submitters

1042. The Waimakariri District Council [367.20] request to rezone 261 Giles Road (Lot 1 DP482329) from Rural Lifestyle Zone to General Residential Zone. This is to better reflect the current Residential 7 zoning of the property in the Operative Plan. They consider that the property was missed off the final map due to a GIS error.

1043. The site is about 3.2ha in area.

1044. Fusion Homes [121.1] request to rezone 261 Giles Road from RLZ to residential zoning, either as general residential or medium density residential.

12.5.2 Assessment

Natural hazards and geotechnical matters

1045. Mr Aramowicz comments:

- *The central part of the site has a medium flood hazard, and the surrounding area is shown to have a low flood hazard (200yr ARI). Appears to be associated with area of lower GL's rather than an overland flow channel*
- *Filling of site could mitigate the medium flood hazard, however, consideration will need to be given to the effect of loss of flood storage volume. This will need to be assessed at time of application for subdivision consent, and where appropriate addressed as part of detailed engineering design*

- *Unknown liquefaction hazard, but given the location of the Silverstream subdivision immediately north of the site, it seems likely that the site could be made geotechnically suitable for the proposed land use.*

Summary

1046. *In summary, it is my opinion that there are no significant constraints that relate to natural hazards or geotechnical conditions.*

Stormwater, wastewater, potable water

1047. I did not request advice on these matters, as the advice on this is contained within the documents for RC215675. This advice considers that the site is serviceable from a three waters perspective.

Transport

1048. Mr Binder makes the following comments:

- *I note this appears to be similar to RC215675*
- *I consider that this property has limited appropriate access for private motor vehicle and no appropriate access by any other modes (e.g., public transport, walking, or cycling) at present.*
- *At present there is no access to Ohoka Road (the existing access is off Giles Road) and I would not support any new access to Ohoka Road, given that it is a high speed Arterial Road*
- *Given the site is disconnected by Ohoka Road from the cycling and walking access in Silverstream, as well as PT service there, I consider it likely that future occupants of any residential use of this site will travel chiefly by private motor vehicle.*

Greenspace:

1049. I did not request advice on greenspace, as it is a relatively small development.

1050. The submitter did not supply evidence in the context of their PDP submission, however I discussed this with the consultant planner for Fusion Homes, Mr Stewart Fletcher. Mr Fletcher is pursuing a consent application¹²⁰ on behalf of his client, and he advised me that I had permission to assess those consent documents in the context of my s42A recommendations¹²¹.

1051. 216 Giles Road is currently shown on the operative District Plan as residential 7, however, the Proposed Plan shows the area as rural lifestyle. I have reproduced the relevant maps below:

¹²⁰ RC215675, Assessment of Environmental Effects, undertaken by Mr Fletcher for Fusion Homes Ltd.

¹²¹ Email to Peter Wilson from Stewart Fletcher 10 May 2024



Figure 82 Operative District Plan maps for 261 Giles Road



28/11/2011



Figure 83 Operative District Plan ODPs A-C for West Kaiapoi (Silverstream¹²²)

1052. In considering the outline development plans above, I note that all three of them show the 261 Giles Road site as intended for stormwater ponds associated with the Silverstream development. I note that the future land use within the development is correlated with a shaded colour, in particular, residential land use receives either blue or red shading. However the Giles Road site does not have a colour, remaining as white.

1053. I also note that the movement network ODP (Sheet B) does not show any proposed road connections to 261 Giles Road.

1054. Thus I do not consider that 261 Giles Road was ever intended for residential land use. I consider that the error occurred because the proposed stormwater ponds were included in the outline of the ODP as a whole, and mistakenly the outline was put in the planning maps as being zoned as residential as a whole.

1055. As the development progressed, it was found that there was no need to have the stormwater ponds on the Giles Road site, with stormwater being managed in Silverstream itself, however, the planning maps were not updated.

1056. I consider that the Proposed Plan has corrected the error in mapping by showing the site as rural lifestyle. Even with the error, I do not consider it would have been possible to develop the site as residential, as it is not consistent with an ODP (CRPS policy 6.3.3).

¹²² See ODPs Map 164A-C for West Kaiapoi, <https://www.waimakariri.govt.nz/council/district-development/district-plan/district-plan-odps-road-hierarchy>

1057. I note that whilst there are no servicing issues with the site identified by Mr Aramowicz, Mr Binder considers that the site would be difficult to integrate, as it is separated from the rest of Silverstream by a strategic and arterial road.

1058. If the proposal was assessed under the responsive planning provisions in the NPSUD, I do not consider that it would provide either significant development capacity¹²³, or contribute to a well-functioning urban environment, because it is separated via the road.

1059. I cannot support this rezoning recommendation.

12.5.3 Recommendations

1060. I recommend the following outcomes for submissions:

- Waimakariri District Council [367.20], Fusion Homes [121.1] are **rejected**

12.5.4 Plan-enabled capacity arising from these recommendations

1061. If the recommendation was to be approved, I consider it would have a lower reserve requirement, of perhaps 15%, as it is a standalone site, not requiring additional reserves apart from roading.

1062. At 600m² allotments, the site would produce 45 dwellings, at 200m² allotments, 136 dwellings, with an average of 91 dwellings.

12.5.5 Amendments

1063. There are no amendments arising from these recommendations

12.6 Other rezoning requests

12.6.1 Matters raised by submitters

1064. Martin Pinkham [184.1-184.51,193.1-193.53] requests to rezone an area (refer to map in full submission) approximately located between Rangiora and Woodend and including Waikuku, as Medium Density Residential Zone (MRZ), noting that:

- The Proposed Plan fails to provide adequate residential housing to meet the expected growth of the District over the next ten years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.
- The Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend MRZ. Rezone an area (refer to map in full submission) approximately located between Rangiora and Woodend and including Waikuku, as Medium Density Residential Zone (MRZ).
- The implement Kaiapoi Fixed Minimum Finished Floor Level Overlay methodology as detailed in NH-R6 to the proposed Rangiora to Woodend MRZ.

¹²³ Para 3 of Mr Fletcher's consent AEE states 29 lots.

1065. Martin Pinkham [193.53] is opposed in part by a further submission from Ravenswood Developments Ltd [FS 79]

1066. Remi LeBlanc [287.1] requests a special purpose zone (lifestyle village) in the following locations:

- Stage one: Total 114.9913ha
- 84 Marchmont Road: 28.4463ha
- 62 Coldstream Road: 17.0249ha
- 84 Smarts Road: 18.243ha
- 88 Smarts Road: 41.2905ha
- 326 Gressons Road: 9.0866ha

- Stage two: Total 36.6858 ha
- 44 Marchmont Rd: 11.4464ha
- 476 Rangiora -Woodend Rd: 25.2394ha
- The intended use of the zoning is a large scale community development for occupants 55 years and over, to provide much needed affordable retirement housing. The homes would be mainly freehold titles, and largely self contained for infrastructure. The submission notes that there would be 2000 homes in Stage One and 600 in Stage Two and allows a large range of amenities to be offered.

1067. This is opposed in further submissions by Ravenswood Development Ltd [FS 79] and supported by Rachel Hobson and Bernard Whimp [FS 90].



Figure 84 257 Tuahiwi Road

1068. Karl Lutterman [128.1] requests to rezone some of his land at 257 Tuahiwi Road, Tuahiwi. He provides the following reasons:

- Karl Lutterman [128.1] at 257 Tuahiwi Road, requests to amend the boundary of the PREC(T) zone, which current aligns with his driveway to his rural property, to align with the Council drain on his property, thus enabling subdivision of some of his existing 1.9ha block.
- The driveway of 257 Tuahiwi Road is in the PREC(T) zone and adjoins an approximate 1904m² Rural/SPZ(KN) zone which is less suitable for rural activity because
- The zone amendment area is detached from the main productive land due to the Council drainage ditch forming a natural boundary.
- The SPZ(KN) area at 243 Tuahiwi Rd is landscaped, planted with specimen trees, and used for residential purposes.
- The zone amendment area is in a pocket of residential property restricting land activity for rural use.
- Amending the PREC(T) zone at 257 Tuahiwi Rd minimises future rural-residential conflicts and is a natural fit with existing residential properties.
- Historic and current Council studies predict growth for the Tuahiwi Precinct area, the pandemic is a further catalyst creating growth demands, the zone amendment supports growth.

- Neighbouring descendants of Ngai Tuahuriri have enquired if the amendment area could be sold, amending the zone increases possible settlement options for Ngai Tuahuriri whakapapa.
- During 2014 the Council Action 21 Land Use Recovery Plan (LURP) proposed rezoning all of the 257 Tuahiwi Rd property to Residential 3.

1069. He requests to amend the Planning Maps to extend the PREC(T) Zone in the 257 Tuahiwi Road driveway west to the Council drain crossing 257 Tuahiwi Road [to enable the rezoning].

1070. Sarah Gale [273.1] requests to retain the medium density rezoning surrounding the town centre of Rangiora.

1071. Hayden O'Donnell [9.1] requests to extend the Medium Density Residential Zone boundary to include 69 Johns Road, Rangiora which is in close proximity, to better enable future subdivision to target first home buyers.

12.6.2 Assessment

Martin Pinkham

1072. Mr Pinkham has submitted extensively on objectives, policies and methods to request that Kaiapoi is rezoned as medium density residential. I note that the PDP has proposed that the centre of Kaiapoi was rezoned as PDP medium density, however Mr Pinkham requests that all of Kaiapoi is rezoned as medium density residential to give effect to the RMA Enabling Housing Act. This occurred under Variation 1, but Mr Pinkham's submission is on the PDP, with no corresponding Variation 1 submission. I consider that what Mr Pinkham has requested under the PDP has been enacted, however, I recommend rejecting his submissions on grounds of scope.

Remi Le Blanc

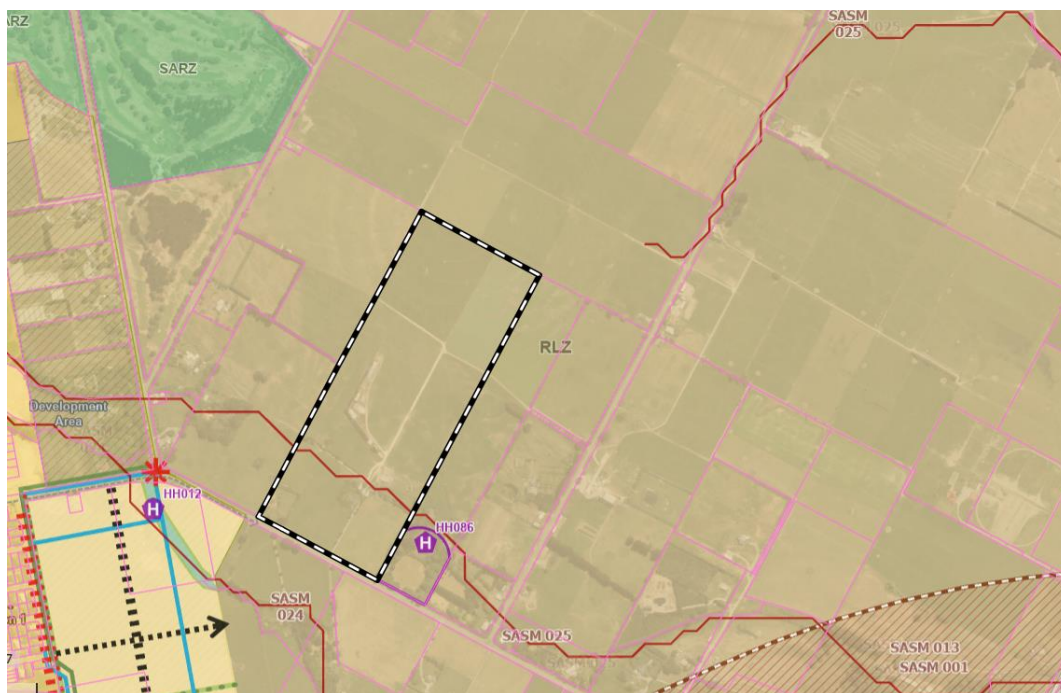


Figure 85 1. Remi Le Blanc rezoning area (476 Rangiora-Woodend Road mapped)

1073. This submitter requests a lifestyle village on land in the area of the map above, and other properties in the vicinity. No evidence was supplied with this request, and as such, I have no information on which to assess the merits of the proposal. As such, I recommend this request is rejected.

Karl Lutterman

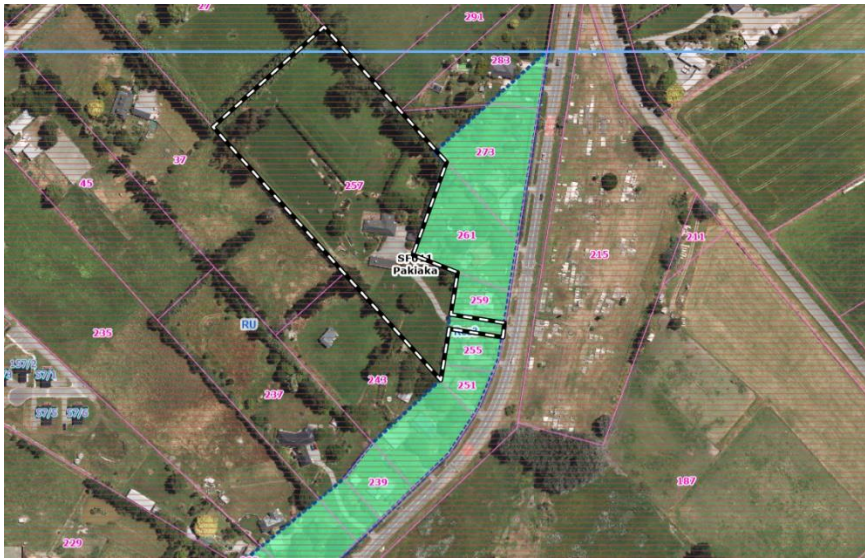


Figure 86 Operative District Plan zoning for 257 Tuahiwi Road



Figure 87 Proposed Plan zoning for 257 Tuahiwi Road

1074. Mr Lutterman is the landowner of 257 Tuahiwi Road, a parcel of land of 1.983ha¹²⁴, within the proposed SPZ(KN) zone. He is currently zoned as rural, with his driveway under the residential 3 zone. The PDP proposes to replace the rural zoning with SPZ(KN), and replace the residential 3 zoning with the Tuahiwi PREC(T) overlay.

1075. Mr Lutterman wishes to be able to subdivide his property back to the line of an existing drain, which bisects the smaller eastern triangle of his block, which would thus make that part of his property available for rezoning.

1076. I have discussed the submission with Mr Lutterman, explaining the following:

- That the PREC(T) “zone” is not a zone, it is an overlay, reflecting the boundaries of the operative residential 3 zone. The overall proposed zone is the Tuahiwi SPZ(KN), with the PREC(T) overlay carrying over some of the components of the residential 3 provisions.
- The PREC(T) overlay does provide for subdivision down to 600m², otherwise any subdivision of general, non-Maori land¹²⁵ below 4ha is a non-complying activity, which is the same as for the rural lifestyle zone generally.
- Currently, the residential 3 zone, and the proposed PREC(T) overlay covers Mr Lutterman’s driveway.
- The policy that govern the application and spatial extent of the PREC(T) overlay is SPZ(KN)-P5, stating: “Apply: the Tuahiwi Precinct to land in and immediately around Tuahiwi marae to recognise the previous zoning (Residential 3) and use of the land for urban purposes, mainly residential; and the Large Lot Residential Precinct to land along Old North Road, Kaiapoi to recognise the previous zoning (Residential 4B) and the use of the land for mainly rural residential purposes”, which I consider provides no scope for amending the PREC(T) in the context of a rezoning request.
- I also note that the SPZ(KN) chapter provisions were heard in stream 2.

1077. I have also advised Mr Lutterman of the following:

- The part of his property under the PREC(T) overlay is available to subdivide. It is about 387m², which is smaller than other parcels under the overlay, but still developable.
- However, the property may have no other viable access, as alternative access would require arrangements over other properties. There are other properties in this situation, where the primary dwellings are sited to the rear of the operative residential zoning, and where the PREC(T) overlay also applies to driveways.
- His ability to subdivide the property is the same as any other rural lifestyle zoned land, and on the smaller sub-threshold properties, he still has the ability to erect a minor residential dwelling.
- If the property is sold to a Ngai Tahu descendant, or if Council could be satisfied that future titles released from a subdivision will be owned by a Ngai Tahu descendant, there is no minimum lot size for subdivision. I consider this an additional benefit for properties in the

¹²⁴ Fee Simple, 1/1, Kaiapoi Maori Reserve 873 86 C, 87 C and 147 C Block

¹²⁵ Maori land has a specific meaning in the context of the SPZ(KN) zone, meaning land owned by Ngai Tahu descendants.

proposed SPZ(KN) zone, reflecting the intent of the PDP to implement Kemps Deed in respect of MR873.

- I consider that I cannot meet the policy requirements for amending the PREC(T) zone.

1078. I thus recommend this rezoning request is rejected.

Sarah Gale

1079. For Sarah Gale, I note that Variation 1 has superseded the PDP medium density zone for the town centre of Rangiora. However, I consider that the provisions of the zones are similar, so this submitter's relief is given effect to in part, however, the submitter may not have scope on Variation 1 itself.

Hayden O'Donnell

1080. For Hayden O'Donnell, 69 Johns Road is outside of the boundary of the PDP medium density zone, which is one block to the east. However, 69 Johns Road is within the V1 medium density zone, which has similar provisions, so I consider that this submitter's relief is given effect to in part, however, the submitter may not have scope on Variation 1 itself.

12.6.3 Recommendations

1081. I recommend the following outcome for submissions:

- Martin Pinkham [184.1-184.51,193.1-193.53], Remi LeBlanc [287.1], Karl Lutterman [128.1] are **rejected**
- Further submitter Rachel Hobson and Bernard Whimp [FS 90] is **rejected**
- Further submitter Ravenswood Developments Ltd [FS 79] is **accepted**
- Sarah Gale [273.1], Hayden O'Donnell [9.1] are **accepted in part**

12.6.4 Plan-enabled capacity arising from these recommendations

1082. I have not considered plan-enabled capacity arising from these recommendations as I do not have sufficient information to assess future developments on these sites, or the submissions are not relevant to a capacity assessment.

12.6.5 Amendments

1083. There are no amendments to the Proposed Plan arising from this section.

13 Certification

1084. I outlined in my responses to this issue during Stream 10A hearings and expert conferencing that I would make final recommendations on the 'certification' provisions for the release of land within the future development areas as part of my stream 12 recommendations, after I had considered rezoning submissions.

1085. As I have now made recommendations on rezonings within the FDAs, I consider that I can address the certification issue.

1086. I note that I have recommended to rezone most of the future development areas. There is a residual part of the SER development area, east of the Sparks land, that I did not recommend to rezone.

1087. I do not consider that there is a need for certification or land release provisions for the remaining small area of development area.

1088. As such, the following provisions would need to be removed from the PDP, as I have set out in Appendix A:

- DEV-WR-O1, DEV-WR-P1, DEV-WR-P2, Activity Rules – if certification has been approved, development area standards
- DEV-NER-O1, DEV-NER-P1, DEV-NER-P2, Activity Rules – if certification has been approved, development area standards
- DEV-SER-O1, DEV-SER-P1, DEV-SER-P2, Activity Rules – if certification has been approved, development area standards
- DEV-K-O1, DEV-K-P1, DEV-K-P2, DEV-K-P3, Activity Rules – if certification has been approved, development area standards
- And any other references to certification in the PDP.

14 Capacity and Growth

1089. I note that I have recommended to rezone most of the future development areas. There is a residual part of the SER development area, east of the Sparks land, that I did not recommend to rezone.

1090. I have undertaken a s32AA evaluation on the capacity arising from rezoning recommendations in respect of the relevant housing capacity assessment bottom lines and targets. This is in the form of a spreadsheet, as submitted as an attachment to this evidence. In the context of s32AA RMA, I considered this was the most beneficial approach to understanding and considering the various rezoning requests in the context of the other requests.

1091. This enables the comparison and consideration of rezoning recommendations across the District 'in the round' with other rezoning recommendations in respect of overall plan-enabled capacity arising from recommendations. I have included the overall rezoning recommendations from other s42A report authors in the overall capacity picture.

1092. I have accounted for potential plan-enabled capacity in anticipated and unanticipated urban environments as follows:

- RECOMMEND ACCEPT – for those rezoning submissions I recommend accepting
- CONTINGENT – for those rezoning submissions that I need further evidence on before I can make a final recommendation
- RECOMMEND REJECT – for those rezoning submissions I recommend accepting
- ACCEPT BUT NOT INCLUDED – for those rezoning submissions that I recommend accepting but which are not likely to become feasible, as existing landowners are not likely to develop in the short-medium, or the first half of the long term periods. However, this land would be live-zoned and available if needed.

1093. I have provided a system, through a spreadsheet, that enables the various parameters of rezoning proposals, such as total area, area and percentage of reserves, and the lower and upper bound allotment sizes to be amended and adjusted as required.

1094. It also enables different recommendations to be assessed against capacity targets, if the Panel were minded to take a different approach to rezoning recommendations.

1095. I consider that there will always be unders and overs with long term assessments of this nature, but that any unders and overs should be assessed relative to the overall capacity enabled by recommendations.

Which targets to use

1096. The NPSUD requires housing capacity assessments (HCA) to be undertaken 3-yearly. These are undertaken for the Waimakariri District by the Greater Christchurch partnership, on behalf of the Waimakariri District Council, the Selwyn District Council, and the Christchurch City Council.

1097. The PDP contains the 2018-2028 HC, in UFD-O1. I consider that this is now out of date. The 2018-2028 short-medium term bottom line was 6300 houses, with a long-term bottom line (2028-2048) of 7100 houses.

1098. The CRPS contains the 2021-2031 HCA, in Objective 6.2.1(a)¹²⁶. This contains a short-medium term bottom line of 5,100 houses, and a long term bottom line of 7400 houses. I consider that this is technically the official HCA that the PDP is required to implement.

1099. There is now a 2023-2031 HCA, with targets as set out below¹²⁷:

Table 5 pg 9, GC 2023 HCA

Area	Short-Medium Term	Long Term	Total
Waimakariri	5600	7650	13250
Christchurch	14150	23350	37500
Selwyn	10000	17350	27350
Greater Christchurch	29750	48350	78100

1100. I consider that the difference between the 2031 targets and the 2023 targets is 500 additional homes, which is reflective of annual demand increases. The long term demand is for 7650 homes. The long term difference is an additional 750 homes, also reflective of annual demand increases.

1101. I note that the Canterbury Regional Council have not yet updated the CRPS with the 2023 HCA, however, I consider that the PDP should be updated with these figures, with UFD-O1 amended accordingly.

What capacity exists currently

1102. I provided a memorandum in hearing stream 12D¹²⁸ on three aspects of capacity and growth:

- Outlining Council’s monitoring of supply and uptake of housing in selected greenfields areas, through the LUMS survey.
- Understanding the remaining plan-enabled capacity within those greenfield areas and comparing those to the 2031 CRPS short to medium term targets.
- Understanding infill and multi-unit development in brownfields areas.

1103. As a planner, I assess plan-enabled capacity arising from:

- My understanding of what capacity is available currently.
- What might be available in the future resulting from rezoning recommendations.

1104. I have stated that I do not consider there to be short-medium term shortfall in plan-enabled capacity in the District, noting that whilst plan-enabled capacity within existing greenfields areas, as well as multi-unit intensification and infill is sufficient through to 2031, and also 2033, it does start to become tight at the end of this period *if no land is rezoned*.

¹²⁶ Inserted on 16 September 2022 via s55 RMA.

¹²⁷ Available from the GC Partnership, <https://www.greaterchristchurch.org.nz/assets/Documents/greaterchristchurch-/HuiHui-Mai/Greater-Christchurch-Housing-Development-Capacity-Assessment-March-2023-v3.pdf>

¹²⁸ Appendix H, Mr Willis’s planning EIC for hearing 12D.

1105. If accepted, my rezoning recommendations for rezoning as set out above live-zone an additional 6901 to 9915 houses¹²⁹ in greenfield areas. When that is added to the existing capacity that exists within the District currently, I arrive at a long term plan-enabled capacity of about 14000 houses. Given the trends towards higher densities and smaller lot sizes, I consider that the figure is likely to be higher than this.

1106. I note that multi-unit intensification and infill occurs on top of this.

Feasibility

1107. I am not qualified to assess feasibility of the plan-enabled capacity, leaving that to Mr Yeoman to undertake using the WDCGM 2023.

1108. Mr Yeoman¹³⁰ has stated that he considers that there is the following existing short-medium term capacity within Rangiora, Kaiapoi, and Woodend:

- Demand + Margin – 4970
- Feasible supply – 5940
- Sufficiency - 970

1109. I note that this includes both existing greenfields developments and brownfields intensification and infill.

1110. He has also stated that that he considers there to be sufficient capacity out to 2053 (the 30-year scenario, which includes the short-medium term capacity):

- Demand + Margin 11700
- Feasible supply 14450
- Sufficiency 2750

1111. Most of this capacity becomes available through live-zoning if the rezoning recommendations I have made are accepted. I note the following differences as I currently understand it between my rezoning recommendations and the WDCGM:

- It includes modelled feasible capacity arising from the Stokes development. I have recommended rejecting this.
- It includes modelled feasible capacity arising if all of the FDAs are live-zoned, I have recommended that about 90% of the FDAs are live-zoned, leaving out a small parcel of the West Rangiora FDA (due to flooding) and the land east of Sparks Block A in the South East Rangiora FDA (which is still available for rezoning in the future).
- It also includes the areas I recommended to accept for live-zoning but which may not be developed in the short-medium term, or even the first half of the long term.
- I also do not include intensification and infill in my plan-enabled capacity assessment, as this capacity already exists.

¹²⁹ Using my average and upper bound(MDRS) scenarios for density

¹³⁰ Figure 2.2, Mr Yeoman, 12E EiC

1112. Thus my I consider there is broad agreement between the plan-enabled capacity arising from my recommendations and the predictions of the WDCGM.

Conclusion

1113. I note that the vast majority of the additional capacity is within the urban areas of the District, namely Rangiora, Kaiapoi, and Woodend.

1114. Other s42A report authors have recommended the following plan-enabled capacity arising from their rezonings in the following areas:

- Oxford – 48
- Settlement zones (including Ashley) – 70
- LLRZ (definite) – 654
- Rural – 26.

1115. I consider this reflective that the vast majority of the demand, and thus the vast majority of the rezoning requests made by submitters, are for rezoning in and around the existing urban towns of the district.

1116. I consider that as a result of these rezoning recommendations, that over 30 years of land with additional sufficiency has been live zoned, based on the adopted “high growth scenario”.

14.1 Minor Errors

1117. I have not identified any minor errors that I consider should be corrected under cl 16(2), Sch 1, RMA as part of this reporting.

15 Conclusions

1118. Having considered all the submissions and reviewed all relevant statutory and non-statutory documents, I recommend that Proposed Plan should be amended as set out in Appendix A of this report.

1119. I consider that my recommendations, in the context of s32AA, RMA:


- achieve the purpose of the Resource Management Act 1991 (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
- achieve the relevant objectives of the Proposed Plan, in respect to the proposed provisions.

Recommendations:

1120. I recommend that:

- a) The Hearing Commissioners accept, accept in part, or reject submissions (and associated further submissions) as outlined in Appendix B of this report; and
- b) The Proposed Plan is amended in accordance with the changes recommended in Appendix A of this report.

Signed:

Name and Title		Signature
Report Author	Peter Wilson	

Appendix A. Recommended Amendments to Proposed District Plan

15.1 West Rangiora New Development Area

15.1.1 South Block

- That the planning maps for this area are changed to PDP medium density residential, excluding 20 and 24 Angus Place
- That the ODP for the West Rangiora development area is otherwise amended according to Mr Jolly's design changes.
- That the mapping errors for the Townsend Road reserve park are addressed, as stated by Mr Read

15.1.2 South West Rangiora Development Area

- [The changes for this area to the ODP and rezoning occur above as for the south block]

Minor adjustments to the roading layout in the ODP reflecting the current development pattern as approved in subdivision consents for Townsend Fields.

- A separate boundary showing demarcation from the wider WR dev area, as the South West Rangiora (SWR) development area. This would be a black boundary around the part of Figure 9 that is shaded yellow, and a separate entry into the legend.

15.1.3 Middle Block

- That the planning maps are changed to rezone the middle block to PDP medium density residential
- A stormwater drain along Lehmans Road stormwater drain is added (as per Mr Jolly's changes).
- Narrative text explaining this stormwater provision is added

15.1.4 North Block/Brick Kiln Lane

- That the planning maps are changed to rezone Brick Kiln Lane to PDP medium density residential
- That the existing West Rangiora ODP is amended with the principal roads added only

15.2 North West Rangiora Existing Development Area

I recommend no amendments at this time.

15.3 North Rangiora Existing Development Area Extension

- That the planning maps for the area are changed to rezone it as general residential
- That the existing North Rangiora ODP is amended as per Mr Jolly's recommendations

15.4 North East Rangiora New Development Area

- That the planning maps for the fee simple properties on the west side of Golf Links Road are changed to rezone it as PDP medium density residential
- That Option A is deleted from the ODP text
- That the ODP maps for the NER development area are updated to reflect the approved Bellgrove subdivision consent ODPs.

That narrative text is added to the NER ODP for the western side of Golf Links Road area as follows:

- Minimising access points to 3 or less.
- Provision for a shared pedestrian and cyclepath.
- Ensuring esplanade strips on Taranaki Stream.
- Recognising that existing trees and vegetation could form part of any new developments.
- The notified ODP has to be extended north to cover all of Rangiora Golf Club Incorporated property.

15.5 South East Rangiora

15.5.1 Bellgrove North Area

The entirety of the South-East Rangiora development area north of Northbrook Road is rezoned to PDP medium density residential.

This includes the Thompson block, Leech block, the part of the Kelley block inside the development area with the additional land (about 2 ha), and part of the Beaufort Trustee block (4.2 ha).

The remainder of the Kelley block retains the proposal to rezone it to RLZ, as with other currently zoned rural land.

That the following amendments to the ODP occur, as per Mr Jolly's recommendations:

Providing for at least a 20m buffer, consistent with cultural advice alongside the Cam / Ruataniwha, made up of the following:

At least a 20m open space strip between any urban development on Bellgrove South and their property boundary, irrespective of a relationship with the Cam.

An indication in the narrative text of the ODP and the maps for a future reserve, park, or esplanade reserve on the western portion of the Kelley land.

- 40m setbacks on each side of the Cam/Ruataniwha through the Leech property.

- Transport connections through the Leech land to the Kelley block, including an additional Cam/Ruataniwha stream crossing.
- Accesspoint to the Kelley land at the point of the existing driveway.
 - Prohibitions on accessways between the existing Kelley driveway and the bend in Rangiora-Woodend Road, protecting the strategic and arterial road.
 - Narrative text on drains and drain setbacks, as most will be waterways

15.5.2 Sparks Block A

I recommend that the planning maps for the Sparks Block A area are changed to rezone it to PDP medium density residential, with the following additions to the ODP:

- A prohibition on accesspoints to the REL, with these access points to come from local roads instead;
- The final determination of the location of the commercial node to occur after recommendations on Blocks B and C.
- That the access to the eastern part of the development area over the Northbrook Stream as appears on the notified ODP remains.

I note my recommendations in respect of waterways, including drains, springheads, and any wetlands that may be identified, as above.

15.5.3 Sparks Block B and C

I recommend that the planning maps for the Sparks Block B area are changed to rezone it as PDP medium density residential, with the following additions to the South East Rangiora ODP:

- ODP added to the ODP within DEV-SER-APP1
- Access points removed from the REL
- New access points to Block B from local roads.
- The ngā tūranga tupuna cultural landscape, representing former extent of a podocarp forest that centred on Rangiora, is incorporated into the design.

I recommend that the Sparks Block C area is included within the South-East Rangiora development area, with an explanation outlining its potential suitability for commercial or industrial uses.

15.6 Woodend

15.6.1 Chinnerys Road

I recommend that the planning maps for the area are changed to rezone it as general residential, with the following additions or changes:

- An ODP inserted into the plan as per Mr Jolly's recommendations, as a new existing development area entitled Chinnerys and Grange Road development area. The final nature of the ODP in respect of principal roads could be determined through the Right of Reply.
- A provision to ensure protection and retention of existing mature trees in any new development.

15.6.2 Woodwater Limited

- That the planning maps for the area are changed to include PDP medium density residential zoning for the Woodwater area.
- That the ODP provided by submitters is updated to include Mr Jolly's recommendations
- That the area becomes an existing development area in DEV section of the PDP
- That a rule is proposed for limiting subdivision until such time as the Woodend bypass is constructed.
- That the offsite stormwater provision is noted.

15.7 Ravenswood

- As set out in the report for remapping the Council reserve parcels to OSZ and NOSZ zones.
- Remap the zone boundaries to align with the road boundaries for existing completed stages of the development.
- Amend the ODPs to include a larger scale and smaller scale ODP

15.8 Pegasus

That the proposed plan maps and ODPs are updated to include 70 and 74 Maplesham Drive within Area 7 of the Pegasus Special Purpose Zone (SPZ(PR)).

15.9 Kaiapoi

That the Proposed Plan zoning maps are amended to include additional open space zoning between the SPZ(KR) and the existing residential zoning, as per Mr Jolly's recommendations on open space buffers above.

That the planning maps for the Kaiapoi Development area are amended to show all of the north block and south block zoned as PDP medium density residential.

Amend the ODP in DEV-K-APP1 to require an additional neighbourhood "pocket" park in the southern part of the ODP for the Momentum North Block

An ecological survey of land for springs and other freshwater features to occur as part of subdivision consent.

15.10 Certification provisions

- DEV-WR-O1, DEV-WR-P1, DEV-WR-P2, Activity Rules – if certification has been approved, development area standards
- DEV-NER-O1, DEV-NER-P1, DEV-NER-P2, Activity Rules – if certification has been approved, development area standards
- DEV-SER-O1, DEV-SER-P1, DEV-SER-P2, Activity Rules – if certification has been approved, development area standards
- DEV-K-O1, DEV-K-P1, DEV-K-P2, DEV-K-P3, Activity Rules – if certification has been approved, development area standards

Appendix B. Recommended Responses to Submissions and Further Submissions

The recommended responses to the submissions made on this topic are presented below:

Submitter Number	FS	Location	Submitter Name	Provision	Sentiment	Decision requested	Section of this Report where Addressed	Officer's Recommendation
9.1		Rangiora	Hayden O'Donnell	MRZ	Amend	Support the Medium Density zoning surrounding the town centre of Rangiora. Retain the Medium Density zoning surrounding the town centre of Rangiora within the planning maps.	Section 13.6	Accept in part
173.1		Kaiapoi	David Colin, Fergus Ansel Moore, Momentum Land Limited	Kaiapoi development area	Amend	Rezone the land subject to this submission to Residential Medium Density, to allow for a density of development that is consistent with adjacent residential land. Amend the Kaiapoi Outline Development Plan to show the 'Residential Medium Density' Zone location. That the above rezoning to Residential Medium Density be undertaken in advance of the certification process. Retain the enabling policy for Retirement Villages in Residential Zones.	Section 13.3	Accept
173.1	FS 80	Kaiapoi	FS Christchurch International Airport Limited	Kaiapoi development area	Oppose			Reject
118.1		Rangiora	Alphons and Elisabeth Sanders	WR - West Rangiora Development Area	Amend	Support provision for residential development in West Rangiora and suggests that West Rangiora Development Area should be zoned General Residential Zone to meet the demand for new houses. Oppose the Movement Network and maps in the West Rangiora Development Area, because the proposed new primary road from Oxford Road to Johns Road is unnecessary as there are already good roads serving the Proposed Development with Oxford Road, Lehmans Road, West Belt and Johns Road. A straight new primary road will just become a race track. Rezone the West Rangiora Development Area to General Residential Zone. Amend the proposed Movement Network in the maps of the Development Area with no straight through road.	Section 5.4	Accept

179.1		Rangiora	Rachel Claire Hobson and Bernard Whimp	DEV-NER-O1	Amend	Include 518 Rangiora-Woodend Rd within a New Development Area given its proximity to the proposed North East Rangiora Development Area and South East Rangiora Development Area, it's adjacency to one of Rangiora's major arterial roads, and Rangiora's expected growth rate.?Include 518 Rangiora-Woodend Rd (and adjoining properties as appropriate) within the North East Rangiora Development Area or South East Rangiora Development Area.	Section 7.4	Reject
179.1	FS 39	Rangiora	FS Marcus Obele		Oppose			Accept
179.1	FS 80	Rangiora	FS Rachel Hobson and Bernard Whimp		Support			Reject

179.2		Rangiora	Rachel Claire Hobson and Bernard Whimp	DEV-SER-01	Amend	Include 518 Rangiora-Woodend Rd within a New Development Area given its proximity to the proposed North East Rangiora Development Area and South East Rangiora Development Area, it's adjacency to one of Rangiora's major arterial roads, and Rangiora's expected growth rate.?Include 518 Rangiora-Woodend Rd (and adjoining properties as appropriate) within the North East Rangiora Development Area or South East Rangiora Development Area.	Section 7.4	Reject
179.2	FS 39	Rangiora	FS Marcus Obele		Oppose			Accept
181.1		Rangiora	North Rangiora Owners Group	General	Oppose	Rezone 300, 302, 310, 311, 312, 315, 319, 321, 324, 327, 331, 335, and 336 West Belt 105 and 109 River Road and 1, 3 and 5 Ballarat Road, Rangiora from Large Lot Residential Zone to General Residential Zone (GRZ). The location of the subject properties is more appropriate to the GRZ zone description. The subject properties have a high level of connectivity with the GRZ zoned areas and wider amenities. The subject properties can be appropriately serviced at the level of density allowed by the GRZ zone and is appropriate for residential development. The GRZ zoning would allow a greater level of residential density within the subject properties.Rezone ?300, 302, 310, 311, 312, 315, 319, 321, 324, 327, 331, 335, and 336 West Belt 105 and 109 River Road and 1, 3 and 5 Ballarat Road, Rangiora from Large Lot Residential Zone to General Residential Zone (GRZ). Delete the GRZ Overlay (on the basis that it is no longer required on the basis of the above rezoning and as an Outline Development Plan will have been agreed and implemented).	Section 6.3	Accept

183.16		Rangiora	Richard and Geoff Spark	General	Amend	<p>Rezone all land (approximately 30ha) in the vicinity of Boys Road and Marshs Road, in southeast Rangiora and to the west of the proposed Eastern Bypass from Rural Lifestyle Zone to General Residential Zone (GRZ) and Medium Density Residential Zone (MRZ) (outlined in red on Figure 1A of original submission) or alternatively rezone to GRZ, MRZ, BIZ, Format Retail/Mixed Use, or a mix of these.</p> <p>Rezone all land north of Boys Road, Rangiora, and within the South East Rangiora Development Area (outlined in red on Figure 1A of the original submission) to GRZ.</p> <p>The proposed Eastern Bypass will isolate 30ha of the farm and there has been no consideration to integration. Farming the land is becoming unfeasible due to urban neighbouring uses, and moving stock across busy roads. The certification process for enabling urban development is uncertain and slower than rezoning the land. This land is a logical and planned location for further growth, and rezoning will achieve a compact, efficient and connected urban form, and help potential shortfall in housing or business land.</p> <p>As a less preferred alternative, retain zoning but amend to address concerns with the certification process including so that it is a lawful, fair, equitable, transparent, appealable, efficient and fast process for delivering land for housing and does not duplicate matters than can be dealt with at subdivision stage.</p> <p>Rezone all land (approximately 30ha) in the vicinity of Boys Road and Marshs Road, Rangiora (located to the west of the proposed Eastern Bypass) from Rural Lifestyle Zone to General Residential Zone (GRZ) and Medium Density Residential Zone (MRZ) (outlined in red on Figure 1A of original submission) or alternatively rezone to GRZ, MRZ, BIZ, Format Retail/Mixed Use, or a mix of these.</p> <p>Rezone all land north of Boys Road, Rangiora, and within the South East Rangiora Development Area (outlined in red on Figure 1A of the original submission) to GRZ.</p> <p>This land is part of the Spark dairy farm, located at 197 Boys Rd Rangiora (Lots 1, 3 DP 418207 Lot 1 DP 80780, Lot 1 DP 80781 RURAL SECS 1883 1884 2452 2512 PT RURAL SECS 316 358A 387 1436 1438 BLK VII XI RANGIORA SD 1) and at 234 Boys Road (Lot 1 DP 22100), and also includes Rosburn and Northbrook Museum (17 Spark Lane, Lot 1 DP 48207) and 19 Spark Lane (Lot 2 DP 418207) (refer to map of these areas in Figure 1B of the original submission).</p> <p>As a less preferred alternative, retain but address the concerns with the certification process including so that it is a lawful, fair, equitable, transparent, appealable, efficient and fast process for delivering land for housing and does not duplicate matters than can be dealt with at subdivision stage.</p>	Section 8.3	Accept
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183.16	FS 85	Rangiora	FS Bellgrove Rangiora Ltd		Oppose			Reject
207.1		Rangiora	Summerset Retirement Villages (Rangiora) Ltd	General	Support	The General Residential zoning of the Summerset land reflects Plan Change 29, however it is not well aligned with the property boundary, esplanade reserve, the stream, or obvious geographic location. Amend to align with the property boundary as this represents the land rezoned under the plan change. Retain General Residential Zone for Summerset land on South Belt, but amend to align with the property boundary.	Section 9.1	Reject
207.1	FS 88	Rangiora	FS Kainga Ora		Oppose			Accept

207.1	FS 99	Rangiora	FS KiwiRail		Support			Reject
212.1		Rangiora	CSI Property	General	Oppose	Oppose Rural Lifestyle zoning for 149, 197, 243 and 287 Boys Road, 4,137, 150 and 228 Marsh Road, 2, 10, 24, 28, 32 and 34 Dunlops Road, 17 and 21 Gefkins Road, 109 Camside Road, and part of 65 Northbrook Road. Seek rezoning to General Residential Zone, with some commercial zoning as required to service that area. Rezone the land General Residential Zone with commercial zoning as required to service that area.	Section 8	Reject, Accept in part for 52 Northbrook Road only
212.1	FS 37	Rangiora	FS Richard and Geoff Spark		Support in part			Reject
212.1	FS 92	Rangiora	FS Transpower New Zealand Ltd		Neutral			Accept
213.1		Rangiora	Ruth and Bruno Zahner	General	Amend	The West Rangiora Development Area (WR) relies on a new, untested and highly discretionary certification process. Certification lapses within 3 years if the development is not completed, and the land is not rezoned until all land has been certified and developed. Rezone 70 Oxford Road and other land within WR to meet requirements of the National Policy Statement on Urban Development 2020, and there is a shortage of land for housing. Under the section "Land Use Plan", support minimum lot size of 500m ² , but oppose minimum density of 15 households per ha applied to submitter's property due to constraint of the location of existing dwelling 10-12 lots per ha would be more appropriate. Under the section "Open Space and Stormwater Reserves" object to "The optimal location for a stormwater reserve to cater for the catchment of development north of Oxford Road, west of Brick Kiln Road in a comprehensive manner is at the south-eastern point within this area of land". This is not the optimal location as it is uncertain if and when that land will be developed. In comparison, submitter's intention is to make the land available immediately. Support the proposal for on-site smaller stormwater reserves, soak pits, swales and/or raingardens for the reasons outlined, i.e. fragmented property ownership and possible site by site development. Rezone 70 Oxford Road, Rangiora and other properties within the West Rangiora Development Area to General Residential Zone.	Section 5.5	Accept

223.1		Rangiora	John and Coral Broughton	General	Amend	<p>Rezone 113 and 117 Townsend Road (8.4ha) ('the site') from Rural Lifestyle Zone to General Residential Zone (GRZ) and Medium Density Residential Zone which would accommodate approximately 100 lots. Alternatively, amend the Residential Zone provisions to provide for medium density residential development in the GRZ.</p> <p>Rangiora has about four years vacant land supply and given it takes 3-5 years to bring zoned land to the market there is urgency in providing additional capacity. Rezoning would help address this shortfall in the face of high demand to deliver affordable medium density housing and achieve sustainable growth. It would contribute to a well-functioning urban environment, meeting objective 6(c) of the National Policy Statement on Urban Development (NPS-UD).</p> <p>The site would provide for compact and continuous town growth, offer ease of access to infrastructure and amenities, and provide a high amenity environment. It is within the West Rangiora Development Area and a growth direction within the Waimakariri District Development Strategy's growth. The site is not significantly restricted by natural hazards. Any adverse effects will be minimal and mitigatable. The rezoning is an efficient use of land and infrastructure and better provides for the community's social, economic, environmental well-being than the current land use or any low density residential use. Relying on the certification process to deliver additional housing is not an efficient use of this land. There is no additional cost to the Council to rezone as there is infrastructure capacity. The rezoning is consistent with relevant objectives and policies of the Proposed District Plan, except those relating to Strategic Directions Urban Form and Development and Urban Growth which do not give effect to the NPS-UD. It is consistent with the Canterbury Regional Policy Statement as the site is within a Greenfield Priority Area and the West Rangiora Future Development Area. Rezone 113 and 117 Townsend Road from Rural Lifestyle Zone to General Residential Zone (GRZ) and Medium Density Residential Zone, or amend the Residential Zone provisions to provide for Medium Density residential development in the GRZ.</p> <p>Any further or alternative amendments to be consistent with and give effect to the intent of this submission and the interests of the Submitter, including any changes necessary to give effect to the Enabling Housing Supply and Other Matters Resource Management Amendment Act, rezoning other parts of the West Rangiora Outline Development Plan area to deliver medium density housing.</p>	Section 5.2	Reject
223.1	FS 102	Rangiora	FS McAlpines Ltd		Oppose in part			Reject
223.1	FS 91	Rangiora	FS R J Paterson Family Trust		Allow in part			Reject

223.14		Rangiora	John and Coral Broughton	GRZ-P2	Amend	Amend GRZ-P2 in order to enable the submitter's request to rezone 113 and 117 Townsend Road, Rangiora from Rural Lifestyle Zone to General Residential Zone (GRZ) and Medium Density Residential Zone (preferred), or amend the Residential Zone provisions to provide for medium density residential development in the GRZ. Amend GRZ-P2: "... 5. through careful design provides a range of higher density living choices to be developed within the zone and ..."	Section 5.2	Accept
242.1		Rangiora	Dalkeith Holdings Ltd	General	Amend	Rezone 63 Oxford Road and 212 Johns Road, Rangiora for residential development, which would accommodate approximately 297 General Residential Zone lots and contribute to Rangiora's sustainable growth. Rezoning this land is consistent with the growth direction for Rangiora set out in the Proposed District Plan and Canterbury Regional Policy Statement (CRPS) (site is within a Future Development Area (FDA) on Map A of CRPS). It would give effect to the National Policy Statement on Urban Development and Change 1 of the CRPS. There are no resource management reasons precluding the site from rezoning. It is the most appropriate outcome, particularly given the removal of statutory planning barriers, and the vacant residential land shortfall causing high demand and increasing house prices. Submissions promoting rezoning within FDAs are an immediate opportunity to bridge this shortfall in the medium term, and early part of the long term. Rangiora has approximately four years vacant land supply there is urgency to provide additional capacity given it takes 3-5 years to convert zoned land into developed lots. Further feasible development capacity through zoning is needed to address a shortfall in the sufficiency of feasible residential development capacity to meet the medium-term targets. Rezone 63 Oxford Road and 212 Johns Road, Rangiora (legally described as Pt RS 48562, Lot 1 DP 61800, and Pt RS 903) to General Residential Zone and Medium Density Residential Zone.	Section 5.4	Accept

246.1	A	Rangiora	Miranda Hales	General	Amend	<p>Rezone 126 Lehmans Rd, Fernside for residential development. The site is included as a Future Development Area (FDA) on Map A of the Canterbury Regional Policy Statement (CRPS), which are intended to accommodate increased demand for new dwellings, and respond to the National Policy Statement on Urban Development 2020 (NPS-UD). Rezoning this land for residential would be consistent with the growth direction for Rangiora set out in the CRPS and Proposed District Plan, and give effect to Change 1 of the CRPS and the NPS-UD.</p> <p>There are no resource management reasons as to why the site cannot be rezoned. It would be the most appropriate planning outcome for the site, particularly given the statutory planning barriers have now been removed, and the shortfall of vacant residential land, which is causing high demand and escalating housing prices.</p> <p>Rezoning Future Development Areas (FDAs) should be seen as an immediate opportunity to bridge this shortfall in medium term, and early part of the long term, and would contribute to Rangiora's sustainable growth by accommodating approximately 70 lots. There is about four years vacant land supply in Rangiora and there is some urgency in providing additional capacity. Oppose proposed certification process for delivering land for housing within the New Development Areas including at West Rangiora. While innovation is important, now is not the time to be testing a new, uncertain, and unproven method for delivering land for housing. Rezoning to residential is a quicker and more certain method. Under the NPS-UD, Council must provide at least sufficient development capacity to meet expected demand for housing, and development capacity for the medium term must be zoned and be infrastructure ready. Rezone 126 Lehmans Rd, Fernside, Pt RS 48562, to General Residential Zone and Medium Density Residential Zone.</p> <p>Or, as a less preferred alternative, retain proposed Rural Lifestyle zoning but address concerns with the certification process so it is a fair, equitable, transparent, appealable, efficient and fast process for delivering land for housing.</p>	Section 5.4	Accept
250.2		Rangiora	Survus Consultants Limited	General	Oppose	<p>Seek amendments to urban development area approach in order to achieve sustainable growth and development of the District, meet the requirements of the National Policy Statement on Urban Development 2020, and achieve the purpose of the Resource Management Act 1991. Rezone West Rangiora Development Area, North East Rangiora Development Area, South East Rangiora Development Area, and Kaiapoi Development Area for urban development (i.e. General Residential Zone or other appropriate zoning).</p>	Section 3.4.7	Accept

250.4		Rangiora	Survus Consultants Limited	General	Oppose	Seek West Rangiora Development Area to be rezoned for urban development in order to achieve sustainable growth and development of the District, meet the requirements of the National Policy Statement on Urban Development 2020, and achieve the purpose of the Resource Management Act 1991. Rezone West Rangiora Development Area for urban development (General Residential Zone, or other appropriate zoning).	Section 5.1	Accept
250.5		Rangiora	Survus Consultants Limited	General	Oppose	Seek North East Rangiora Development Area to be rezoned for urban development in order to achieve sustainable growth and development of the District, meet the requirements of the National Policy Statement on Urban Development 2020, and achieve the purpose of the Resource Management Act 1991. Rezone North East Rangiora Development Area for urban development (General Residential Zone, or other appropriate zoning).	Section 7.2	Accept
250.6		Rangiora	Survus Consultants Limited	General	Oppose	Seek South East Rangiora Development Area to be rezoned for urban development in order to achieve sustainable growth and development of the District, meet the requirements of the National Policy Statement on Urban Development 2020, and achieve the purpose of the Resource Management Act 1991. Rezone South East Rangiora Development Area for urban development (General Residential Zone, or other appropriate zoning).	Section 8.2	Accept
250.6	FS 85	Rangiora	FS Bellgrove Rangiora Ltd		Support			Accept

266.1		Rangiora	199 Johns Road Ltd, Carolina Homes Ltd, Carolina Rental Homes Ltd, Allan Downs Ltd	General	Amend	Rezone 163, 191, 199 and 203 Johns Road, Rangiora to General Residential Zone and Medium Residential Density Zone, to create over 200 residential lots. The Canterbury Regional Policy Statement, Proposed District Plan, and Waimakariri 2048 District Development Strategy identify the site for future residential growth. Rangiora needs additional zoned greenfield land to ensure adequate supply for the projected housing growth in the short, medium and long term. Rezoning this land is the quickest approach to meet short term demand, would contribute to a well-functioning urban environment, and provide for housing choice. Support West Rangiora Development Area and certification process but consider it will delay the provision of residential land. The site should be separated into a new, zoned South West Rangiora Development Area that can be integrated with the West Rangiora Outline Development Plan, which would retain the certification process. Townsend Fields wastewater, water supply, and stormwater infrastructure connections were designed with capacity to include the subject site. Based on preliminary modelling and a bund along the site's western boundary, the 200-year Ashley River Breakout and Annual Reoccurrence Interval flood event is not a constraint to the rezoning. The 'Risk of Natural Hazards & Soil Contamination at 163-203 Johns Road, Rangiora' report concludes the site is geotechnically suitable for development. No additional residential land has been zoned in the Proposed District Plan. The certification process is uncertain in terms of the timing for approval, after which subdivision consent is required. The certification provisions do not have immediate legal effect thus development cannot commence until they do. Whereas rezoning provides for the subdivision process once the Proposed District Plan is operative and therefore avoids delays. Rezone 163, 191, 199 and 203 Johns Road, Rangiora to General Residential Zone and Medium Residential Density Zone.	Section 5.2	Accept in part
273.1		Rangiora	Sarah Gale	MRZ	Support	Support the Medium Density zoning surrounding the town centre of Rangiora. Retain the Medium Density zoning surrounding the town centre of Rangiora within the planning maps.	Section 13.6	Accept in part

290.1		Rangiora	Doncaster Developments Ltd	General	Amend	<p>Rezone 11.6ha at the northeast end of Lehmans Road, Rangiora (refer to Figure 1 of Appendix E - 'the site') from Large Lot Residential Zone to General Residential Zone. Proposal includes a mix of styles and densities under an Outline Development Plan (ODP). Seek necessary amendments to objectives and policies and adoption of ODP to enable residential development and subdivision. Submitter developed adjacent land, which includes medium density and townhouse development and amenities. Support good environmental and community outcomes for Rangiora's development. Previous submissions on other consultations include that the 'Our Space' housing bottom lines and urban limits do not support the National Policy Statement on Urban Development (NPS-UD), the urban limits have unreasonably prejudiced availability of the site for development, insufficient supply of suitable housing land in Rangiora and the District, and use of uncertain population projections in setting housing limits. The position of the urban limit (Map A of Canterbury Regional Policy Statement (CRPS)) is outdated and a historical anomaly since the site is zoned rural-residential. The land is serviceable, close to amenities and shopping centre, can consolidate and integrate with urban form, is within 200m of proposed public transport route, and has no hazard risk. Concerned Council has not addressed National Policy Statement on Urban Development Capacity 2016, and NPS-UD, by limiting land release. In 2018, evidence showed there was insufficient housing capacity in Waimakariri. Rezoning will give effect to CRPS by achieving consolidation and efficient use of resources. Housing demand now exceeds that stated in the CRPS, and is consistent with UFD-P3. Future Development Areas and Urban Limits were accepted by the 'Our Space' hearings panel as being indicative only and would allow consideration of merits of proposals.??Rezone 11.6ha at the northern end of Lehmans Road, Rangiora (refer to Figure 1 of Appendix E) from Large Lot Residential Zone to General Residential Zone.</p>	Section 6.1	Recommendation is contingent on rules or provisions that have not yet been assessed
290.1	FS 92	Rangiora	FS Transpower New Zealand Ltd		Neutral			Accept

290.5		Rangiora	Doncaster Developments Ltd	DEV-NWR-APP1	Oppose	Oppose North West Rangiora Outline Development Plan (DEV-NWR-APP1) as it does not provide for housing development of the submitter's land. The property is 11.6ha at the northeast end of Lehman's Road, Rangiora (see Figure 1 of Appendix E - 'the site'). Proposal to develop the site includes mix of styles and densities, and a proposed Outline Development Plan is included in Appendix I of submission. The submitter developed adjacent residential land, which includes medium density and townhouse development and amenities. Support good environmental and community outcomes for the development of Rangiora. Submissions to other consultations include that the 'Our Space' housing bottom lines and urban limits do not support the National Policy Statement on Urban Development (NPS-UD), the Urban Limits have unreasonably prejudiced availability of the site for development, insufficient supply of suitable land for housing in Rangiora and Waimakariri, need sufficiency of supply to address housing crisis, and use of uncertain population projections in setting housing limits. Found participation in these consultations frustrating, and submissions and evidence were not addressed. The Urban Limit (Map A, Canterbury Regional Policy Statement (CRPS)) is outdated and a historical anomaly since the site is zoned rural-residential. The land is serviceable, close to amenities and shopping centre, can consolidate and integrate with urban form, is within 200m of proposed public transport route, and has no hazard risk. Concerned Council not sufficiently addressed National Policy Statements on Urban Development Capacity 2016, and NPS-UD, by limiting land release. In 2018, evidence showed there was insufficient housing capacity in Waimakariri. Rezoning will give effect to CRPS by achieving consolidation and efficient use of resources. Housing demand now exceeds that stated in the CRPS, and is consistent with UFD-P3. Future Development Areas and Urban Limits were accepted by the 'Our Space' hearings panel as indicative only and would allow consideration of merits of proposals. Adopt the suggested Outline Development Plan attached to this submission (Appendix I).	Section 6.1	Recommendation is contingent on rules or provisions that have not yet been assessed
297.1		Rangiora	Michael Culmer Skelley	General	Support	Support development of south side of Johns Road as a residential zone, as a land owner in the West Rangiora development area. Not specified.	Section 5.2	Accept in part
297.1	FS 91	Rangiora	FS R J Paterson Family Trust		Support			Accept
298.1		Rangiora	Nick and Cilla Taylor	SD-O2	Amend	Support future residential development to provide a range of housing opportunities as an urgent need and consider new residential activity in West Rangiora development area is appropriate. West Rangiora Development Area should be zoned General Residential Zone as there is demand now to develop this area for housing consistent with SD-O2. Rezone West Rangiora Development Area to General Residential Zone.	Section 5.4	Accept
298.1	FS 91	Rangiora	FS R J Paterson Family Trust		Support			Accept

298.2		Rangiora	Nick and Cilla Taylor	SD-O4	Support	Support future residential development to provide a range of housing opportunities as an urgent need and consider new residential activity West Rangiora Development Area is appropriate. West Rangiora Development Area should be zoned General Residential Zone as there is demand now to develop this area for housing consistent with SD-O2.Rezone West Rangiora Development Area to General Residential Zone.	Section 5.4	Accept
298.3		Rangiora	Nick and Cilla Taylor	DEV-WR-O1	Support	Support future residential development to provide a range of housing opportunities as an urgent need and consider new residential activity West Rangiora Development Area (WR) is appropriate. WR should be zoned General Residential Zone as there is demand now to develop this area for housing consistent with SD-O2.Rezone West Rangiora Development Area to General Residential Zone.	Section 5.4	Accept
298.3	FS 91	Rangiora	FS R J Paterson Family Trust		Support			Accept
298.4		Rangiora	Nick and Cilla Taylor	DEV-WR-P1	Support	Support future residential development to provide a range of housing opportunities as an urgent need and consider new residential activity West Rangiora Development Area (WR) is appropriate. WR should be zoned General Residential Zone as there is demand now to develop this area for housing consistent with SD-O2.Rezone West Rangiora Development Area to General Residential Zone.	Section 5.4	Accept
298.4	FS 91	Rangiora	FS R J Paterson Family Trust		Support			Accept
313.1	A	Rangiora	James Lennox	General	Amend	Not opposed to rezoning of land in North East Rangiora Development Area, provided Council takes responsibility for sewerage and water infrastructure required for future development. Not happy to lose the rural aspect, but understand need for development and appreciate rezoning will likely increase land value, however would like assurance that rezoning will not mean an increase in rates to pay for installation of services for properties on Golf Links Road and/or the eastern properties of the Inch farm development. Would also like to know if the Council plans to install this infrastructure down Golf Links Road, or between the submitter's property and the Inch property.Seek confirmation that if the properties are rezoned, the cost of future sewer and water mains is covered by the Council, and/or the major developer of the Inch farm.	Section 7.3	Accept
313.1	FS 85	Rangiora	FS Bellgrove Rangiora Ltd		Oppose			Reject

313.1	FS 90	Rangiora	FS Rachel Hobson and Bernard Whimp		Support			Accept
313.1	FS 90	Rangiora	FS Rachel Hobson and Bernard Whimp		Support			Accept
314.1		Rangiora	Carolyn Hamlin	General	Amend	<p>Rezone 35 Golf Links Road as a Development Area, and seek stormwater, sewage, and water to be provided to the boundary 35 Golf Links Road shares with 52 Kippenberger Avenue, rather than the proposal to provide this via Golf Links Rd.</p> <p>?1. There is no date for provision of infrastructure along Golf Links Rd and it could be years away, depending on what happens to the six other properties that are on the same side of Golf Links Rd</p> <p>?2. The cost of providing infrastructure to only one property makes it uneconomic to subdivide</p> <p>3. On the opposite side of Golf Links Rd is the Golf Course, which is unlikely to be subdivided, so considered better to provide infrastructure to the six properties that border 52 Kippenberger Avenue. This infrastructure could be extended in future down Coldstream Rd, the Rangiora Woodend Rd and Marchmont Rd if required. Provide ability to 'futureproof' 35 Golf Links Road as the current development area proposal will change the existing rural lifestyle.</p>	Section 7.3	Accept
314.1	FS 85	Rangiora	FS Bellgrove Rangiora Ltd		Oppose			Reject
314.1	FS 90	Rangiora	FS Rachel Hobson and Bernard Whimp		Support			Allow
319.1		Rangiora	Kenneth Murray Blakemore	General	Amend	<p>Rezone Brick Kiln Road as residential rather than rural with future Development Area overlay. Have previously run livestock at 3 Brick Kiln Lane however this is not compatible to the location to the town centre and surrounding housing. Would like to subdivide and develop 5,000m² of the property. Rezone Brick Kiln Road from Rural Lifestyle Zone to residential now, rather than in the future.</p>	Section 5.5	Accept
319.1	FS 129	Rangiora	FS Ken Blakemore		Support			Accept
319.1	FS 129	Rangiora	FS Ken Blakemore		Support			Accept
319.2		Rangiora	Kenneth Murray Blakemore	General	Amend	<p>Brick Kiln Road is designated as a future development area and is currently zoned Rural. Rezone 3 Brick Kiln Road to Residential to enable the house to be subdivided off and develop the remaining 5,000 square metres. Rezone 3 Brick Kiln Road from Rural to Residential now, instead of in the future.</p>	Section 5.5	Accept

364.2		Rangiora	Philip Davison	General	Amend	<p>Suggests alterations to the Proposed District Plan must consider the proposed changes in the Resource Management Act 1991 and the effects of climate change.</p> <p>Taggarts proposed quarry in the middle of Rangiora Racecourse exposed shortcomings in the District Plan and resource consent process. The public outcry over the proposed quarry was concerned with the effects on health and wellbeing of the nearby residential communities, as well as the pollution to fresh water supplies and heavy truck movements.</p> <p>Seek the District Plan is amended to prevent quarries from operating close to residential areas recommending a distance of 10km from residential areas, and areas should be designated to allow quarries to operate under strict conditions to meet shingle requirements.</p> <p>Suggests excavating shingle out of the Ashley River which would provide a local shingle supply close to an operational railway line and support with flood mitigation. Rezone the Rangiora Racecourse as a recreational area to preserve chance of exploitation. Suggest planting a native forest on the bare land in conjunction with a building centre designed to educate and involve all citizens in the area on environmental matters, and the Racecourse could still operate with such a development.</p>	Section 6.2	Reject
367.60		Rangiora	Waimakariri District Council		Oppose	Amend 'Proposed Road Design' layer name on North West Rangiora Outline Development Plan (ODP) to 'Proposed Road' on Planning Map, and on map in DEV-NWR-APP1 Northwest Rangiora ODP.	Section 6.1	Accept
367.61		Rangiora	Waimakariri District Council		Oppose	Seeks to have more accurate layer name for North West Rangiora Outline Development Plan. Amend 'Proposed Road Design' layer name on North West Rangiora Outline Development Plan (ODP) to 'Proposed Road' on Planning Map, and on map in DEV-NWR-APP1 Northwest Rangiora ODP.	Section 6.1	Accept

391.1		Rangiora	Gregory E Kelley	Land	Amend	<p>Concerned regarding the future potential development of the South East Rangiora Development area.</p> <p>The scale and infrastructure will endanger the Cam River. Family remember the Cam River only drying up once in the past however since purchase of property at 479 Rangiora Woodend Road nine years ago it has dried up four times. Attributes this to drainage, stormwater channels and dry wells in the Northbrook/Goodwin Street area. This endangers native and endemic fauna. The area to the south of the property are partial wetlands and springs with additional native species (crayfish) that do not want to see threatened.</p> <p>The development area runs close to property's western boundary and well. Health and safety concerns about water supply becoming contaminated by storm, waste water or pollution from roading and walkways or flood events. The Proposed District Plan notes there are artesian springs in the area which property is connected to at a minimum through the well and aquifer.</p> <p>Concerned that plans for infrastructure, particularly setbacks from water sources, are not well defined and insufficient. Seek consideration and assurance of the protection of the Cam River and local fauna, and protection of water supply.</p> <p>Rezone 479 Rangiora Woodend Road to Residential/General Residential Zone. 8500m² of the property is available for subdivision outside of the South East Rangiora Development Area (SER) and is currently zoned Rural Lifestyle Zone. The SER abuts the property's western boundaries and will degrade future potential property value.</p> <p>The Proposed District Plan has little or no mention of compensation or remediation and on-going responsibility for negative impacts on surrounding properties caused by the development. Enabling subdivision of the property by rezoning to residential could provide means of recourse should remediation be required to keep property viable, and would be disadvantaged without this option. This could also give options to protect the Cam River and water security.</p>	Section 8.2	Accept in part
391.1	FS 90	Rangiora	FS Rachel Hobson and Bernard Whimp		Support			Accept

407.4		Rangiora	M & J Schluter	General	Amend	<p>Rezone 237 Johns Road to General Residential and Medium Density Residential Zone to release land to efficiently and effectively provide necessary housing development capacity. Future Development Areas (FDA) are necessary to meet housing development capacity shortfall in the District. The National Policy Statement on Urban Development (NPSUD) directs that Council improve housing affordability by supporting competitive land and development markets, and ensuring sufficient development capacity to meet demand for housing in the short, medium and long term. In order to meet the requirement for capacity, land must be plan-enabled, meaning land is zoned for housing.</p> <p>For these reasons it is not necessary to hold back the release of FDAs to manage release of residential development capacity, and rezoning the land now better gives effect to the NPSUD, and saves the expenses of a plan change. To the extent that there are any infrastructure capacity reasons that the property or the wider West Rangiora Development Area cannot be developed now, that can be addressed through a staging rule in the Proposed District Plan. Rezoning will also assist the Council in carrying out its statutory duties under the Resource Management Act 1991, including section 32, and give effect to the Canterbury Regional Policy Statement. Rezone 237 Johns Road to General Residential and Medium Density Residential Zone.</p>	Section 5.4	Accept
407.4	FS 80	Rangiora	FS Christchurch International Airport Ltd		Oppose			Reject
407.4	FS 91	Rangiora	FS R J Paterson Family Trust		Support			Accept

413.2		Rangiora	Bellgrove Rangiora Ltd	General	Amend	<p>Seeks to rezone Bellgrove South and Bellgrove North from proposed Rural Lifestyle Zone to:</p> <p>(a) a mix of Residential General Density Zone and Residential Medium Density Zone generally as shown on the North East Rangiora Outline Development Plan (ODP) and the South East Rangiora ODP or</p> <p>(b) to Residential Zone, as detailed in the first submission [408] on attachment 3a and 3b, and attachment 4a and 4b and</p> <p>(c) Commercial / Business Zone as detailed in the first submission [408] on attachment 3a and 3b, and attachment 4a and 4b.</p> <p>These zones are appropriate as:</p> <ul style="list-style-type: none"> - the reasons described in the first submission [408 - especially paragraphs 11-17]. - the land is identified as suitable for future greenfield residential development in the Canterbury Regional Policy Statement, which will help provide for housing demand in Rangiora - the land is already identified for residential development in the North East Rangiora ODP and the South East Rangiora ODP - the land is adjacent to the Stage 1 land that has been accepted under the Covid Fast-track Consenting Act for referral to the Environmental Protection Authority, with physical connections available for transportation and infrastructure routes - the proposed rezoning will enable a logical extension of the urban form that will be established by development of the Stage 1 land. <p>Requests:</p> <p>(b) The provisions be amended to reflect the issues raised in this submission and in particular that:</p> <p>(ii) The planning maps are amended so that the land is zoned in advance of the certification process proposed to</p> <p>a. A mix of Residential General Density Zone and Residential Medium Density Zone generally as shown on the North East Rangiora Outline Development Plan (ODP) and the South East Rangiora ODP or</p> <p>b. To Residential Zone, as detailed in the first submission [408] on attachment 3a and 3b, and attachment 4a and 4b and</p> <p>c. Commercial / Business Zone as shown in the first submission [408] on attachment 3a and 3b, and attachment 4a and 4b.</p> <p>(iii) the North East Rangiora ODP and the South East Rangiora ODP are amended as may be required to give effect to this submission and/or</p> <p>(iv) such other relief as may be required to give effect to this submission, including alternative or necessary amendments to the Proposed District Plan that address the matters raised by the submitter.</p>	Section 7.2	Accept
FS 85		Rangiora	FS Bellgrove Rangiora Ltd		Support			Accept

77.1		Woodend	East West Developments Limited	General	Oppose	Oppose rural zoning of the land highlighted in orange (adjacent to Parsonage and Eders Roads, and the proposed Large Lot Residential Zone at Woodend), and rezone this land Medium Density Residential Zone. The land is an extension to the existing township, and suitable to build on, commute to Christchurch and nearby towns, accessible by the motor way, and there are nearby services which can be accessed and extended. Rezone the land (identified in the submission) in the future as Medium Density Residential Zone.	Section 10.1	Reject
77.1	FS 79	Woodend	FS Ravenswood Developments Ltd		Support			Reject
91.1		Woodend	Jan De Lange	General	Oppose	Rezone 70 and 74 Mapleham Drive, Pegasus from Rural Lifestyle Zone to either General Residential Zone or Medium Density Residential Zone. The property is spread over two lots and together have a combined area of only 0.52ha and is similar to neighbouring residential properties and is inconsistent with the purpose of the Rural Lifestyle Zone. Rezone 70 and 74 Mapleham Drive, Pegasus from Rural Lifestyle Zone to either General Residential Zone or Medium Density Residential Zone.	Section 11.1	Reject

95.2		Woodend	Rhonda Mather	General	Oppose	<p>The proposed zoning of 64, 66 and 70 Pegasus Main Street as Medium Density Residential Zone (MRZ) is not considered appropriate.</p> <p>The areas host major community events and no other suitably large and located sites remains. Council owned land in Pegasus is very limited, making it difficult to find land for Council facilities, such as a community centre and youth park.</p> <p>A zoning of MRZ would allow high density (3-story) residential development in an area prized for its openness and Lake views. This would destroy the atmosphere and expectation of a semi-rural township and restrict lake access for the community. Pegasus already has sufficient small sized sections and existing MRZ.</p> <p>Council needs to enable zoning for Pegasus to have a community hub and heart, where people from throughout the Waimakariri and beyond want to spend time in Pegasus and patronise its businesses.</p> <p>Leaving the zoning as MRZ would be inappropriate with an ugly obstructive and uninviting block of multi-story residences. 64 Pegasus Main St is inappropriate for an MRZ zoning given that it adjoins to The Good Home gastropub and on an awkward shaped section immediately adjacent to the Lake, a carpark and playground (and public toilets).?Rezone the areas of 64, 66 and 70 Pegasus Main St to enable a mixture of activities such as retail, community facilities and open space (sporting and other community events), plus some type of accommodation facility (such as a motel).</p>	Section 11.1	Reject
95.2	FS 81	Woodend	FS Templeton Group		Oppose			Accept
96.1		Rangiora	David Whitfield	EI-R45	Amend	Oppose the proposal of water, sewage and storm water provision to Golf Links Road. Provide water, sewage and storm water to Golf Links Road from the proposed subdivision at 52 Kippenberger Avenue.	Section 7.3	Accept
96.1	FS 90	Rangiora	FS Rachel Hobson and Bernard Whimp		Support			Accept
125.1		Woodend	Anne Fechny and 14 others: Mr & Mrs C Sharp - 109 Chinnerys Road, Mr & Mrs M Ogle - 95 Chinnerys Road, Mr & Mrs H Tocker - 85 Chinnerys Road, Mr & Mrs G Fechny - 14 Grange View, Mr K & Ms Lucy Magill - 13 Grange View, Mr & Mrs K Robinson - 8 Grange View, Mr & Mrs G Barclay - 73 Chinnerys	Chinnerys Road	Amend	rezone Chinnerys Road and Grange View area from Residential 4B in the Operative District Plan, and Large Lot Residential Zone (LLRZ) (with a General Residential Zone (GRZ) Overlay in the Proposed District Plan) to GRZ. She considers that LLRZ is not appropriate as LLRZ is 'rural-residential development in a rural environment.', 'located near but outside the established townships.', and provides 'residential living in a rural environment'. However the area is now sandwiched between Ravenswood and Woodend and is no longer rural setting. LLRZ is 'an environment with generally low levels of noise, traffic, outdoor lighting, odour and dust'. However, newly built properties and streetlights in Ravenswood have impacted rural environment. The average lot size in LLRZ is 5000m2, however	Section 10.2	Accept

						the average size of submitter's properties (17-107 Chinnerys Road + Grange View) is 4490.8m ² , and other large lots in Woodend are GRZ. Rezoning would enable new homes to be built, supporting increase in population and providing greater mix of housing choices under the Waimakariri 2048 District Development Strategy.		
125.1	FS 79	Woodend	FS Ravenswood Developments Ltd	Chinnerys Road	Support			Accept
143.1		Woodend	Mark and Debbie Ogle	General	Oppose	Oppose Large Lot Residential Zone (LLRZ) for Chinnerys Road and Grange View, would prefer rezone to General Residential Zone (GRZ). The area is now surrounded by GRZ properties in Woodend and Ravenswood, and is no longer low density. New properties are visible from property at 95 Chinnerys Road and do not equate to low levels of noise, lighting and traffic. Extra restrictions of LLRZ are unfair when surrounding properties do not have same rule. Rezone Large Lot Residential Zone at Chinnerys Road and Grange View to General Residential Zone.	Section 10.2	Accept
155.10		Woodend	Woodend-Sefton Community Board	General	Oppose	Oppose the Medium Density Residential zoning (MRZ) of Pegasus lakefront at 64, 66 and 70 Pegasus Main Street (from Bob's Bridge to existing commercial area). Suggests an esplanade reserve or strip or an open space zone to be put in place around the Pegasus Lake to maintain public access. Proposed new community centre and youth space needs to be allowed for. The Council's decision to decline the rezoning of approximately 12.8ha as Business 1 (Town Centre zone) within Ravenswood and the loss of business zoned land at Pegasus through rezoning to residential has meant that the Woodend/Pegasus/Waikuku area does not have a Town Centre which is capable of servicing the retail needs of the growing area. Seek review of how much land at Ravenswood could be rezoned from MRZ to Town Centre Zone. If an esplanade reserve or strip cannot be put in place along Pegasus lakefront, create open space zone to allow for continued public access. Seek allowance for a new community centre and something for youth nearby. Review how much land at Ravenswood could be rezoned from Medium Density Residential Zone to Town Centre Zone.	Section 11.1	Reject

212.2		Woodend	CSI Property	General	Oppose	<p>Oppose Rural Lifestyle and Large Lot Residential zoning of 1271, 1273, 1275, 1277, 1279, 1319, 1355, 1369 Main North Road and Part 1323 Main North Road 5, 99 and 169 Wards Road, 109, 117, 121, 145 and 319 Gressons Road, Parts of 150 Gressons Road (South of Gressons Road) and 209 Gressons Road (the part to the South East of Gressons Road).</p> <p>Rezone to General Residential Zone with some commercial zoning as required to service that area. Rezone the land General Residential Zone with commercial zoning as required to service that area.</p>	Section 10.3	Reject
214.1		Woodend	B and A Stokes	General	Amend	<p>Rezone 33 Gressons Rd, 1301 Main North Road, 1281 Main North Road, 1271 Main North Road, 1273 Main North Road, 1275 Main North Road, 1277 Main North Road, 1279 Main North Road, 1319 Main North Road (approximately 144ha) to a combination of General Residential Zone and Medium Residential Zone.</p> <p>The site can provide for residential development at an appropriate scale with a range of section and housing opportunities, as a coordinated and integrated part of Woodend-Ravenswood residential community, and will consolidate development around the Key Activity Centre at Ravenswood. The site could be serviced by reticulated services, and accessed by road connections from Ravenswood and Gressons Road (Gressons Rd – State Highway 1 intersection upgrade required). There are no natural hazards that preclude the development. Any reverse sensitivity effects on the more sensitive adjoining properties, road network, or matters of critical cultural value and significance can be mitigated. The site can make a valuable contribution to urban growth in the District. It is already identified for Large Lot Residential development, and is identified for future growth at Ravenswood-Woodend. The rezoning is consistent with SD-O2 and UFD-P2. It would be consolidated and integrated with the urban environment. It achieves Policy 1, 2 and 8 of the National Policy Statement on Urban Development. It gives effect to Chapter 5, Chapter 6, and Chapter 16 of the Canterbury Regional Policy Statement. It is consistent with Greater Christchurch Recovery Strategy outcomes. Extensive consultation and critical assessment with Iwi is proposed. Rezone 33 Gressons Rd, 1301 Main North Road, 1281 Main North Road, 1271 Main North Road, 1273 Main North Road, 1275 Main North Road, 1277 Main North Road, 1279 Main North Road, 1319 Main North Road from Rural Lifestyle Zone to General and Medium Density Residential Zone, or identify as 'New Development Area – Ravenswood-Woodend').</p> <p>Adopt and insert the Outline Development Plan (refer to Appendix 3 of the full submission).</p>	Section 12.2	Reject
214.1	FS 79	Woodend	FS Ravenswood Developments Ltd		Support			Reject

215.1		Woodend	Woodwater Limited	General	Amend	<p>Rezone land on Judsons Road, Woodend Beach Road, Copper Beech Road and Petries Road, Woodend (refer to full submission for list of properties) from Rural Lifestyle Zone (RLZ) to residential uses. This land will be an island of rural land surrounded by urban land being General Residential and Special Purpose Kainga Nohoanga Zone. To the east and south of the relevant land, land has been rezoned as either Open Space Zone or Large Lot Residential zoning. This is not sound resource management practice, as it is likely to result in significant constraints on rural activities under the RLZ provision, and not be capable of reasonable use.</p> <p>The land is within the projected infrastructure boundary (PIB) in Map A to Chapter 6 of the Canterbury Regional Policy Statement which identifies the extent of urban development for Greater Christchurch. This indicates areas to be serviced with urban infrastructure and can be ahead of rezoning.</p> <p>Rezone the land within the PIB to enable residential use at a density appropriate to context as the location would consolidate residential development at Woodend. There are benefits for plan-enabled housing capacity under the National Policy Statement on Urban Development 2020 which assists achieving the purpose of the Resource Management Act 1991. Rezone the identified land on Judsons Road, Woodend Beach Road, Copper Beech Road and Petries Road, Woodend (refer to full submission for list of properties) for residential use such as General Residential zoning and/or Medium Density Residential Zone with incorporating the Medium Density Residential Standards identified in the Resource Management (Enabling Housing Supply and Other Matters) Bill 2021. Large Lot Residential zoning may also be appropriate for part of the identified land.</p>	Section 10.4	Accept
215.1	FS 1	Woodend	FS Perforated Sheet Specialists Limited		Support			Accept

216.1		Woodend	Marie Bax	General	Amend	<p>Rezone 331 Woodend Beach Road (part of M?ori Reserve 873 and proposed Special Purpose Zone - K?inga Nohoanga which confers similar rights and restrictions as the Rural Lifestyle Zone (RLZ)) General Residential Zone (GRZ) or Large Lot Residential Zone (LLRZ).</p> <p>The NZ Traffic Agency have tentative plans for either a roundabout or a traffic light-controlled intersection for the five feeder roads at their convergence with the Main North Road (State Highway 1). This will require land from 331 Woodend Beach Road and 1 Judson Road, which will further reduce the viability of the property for primary production.</p> <p>The reason for rezoning is that no new development has occurred there for 20 years, the land is not suitable for intensive farming or horticulture. The site is suitable for residential housing due to excellent vehicle access to Kaiapoi, Rangiora and Christchurch City, a primary school is very close, the Business area and Community Centre and most amenities are easy walking/cycling distance, the land is free draining and soils are of relatively low fertility, it is more compatible with the GRZ or LLRZ than the RLZ, and the land is much closer to the epicentre of the town, which has straggled northward over the last decade. Amend the zoning for 331 Woodend Beach Road to General Residential Zone or Large Lot Residential Zone</p>	Section 10.5	Reject
216.1	FS 93	Woodend	FS Marie Bax		Support			Reject
217.1		Woodend	Cheryl Anne Judson	General	Amend	<p>Rezone 1 Judson Road (4ha) and 328 Woodend Beach Road (2,428m²) from Rural Lifestyle Zone (RLZ) to General Residential Zone (GRZ). Alternatively, apply a moratorium period of up to 5 years in order to provide some certainty, or prioritise 1 Judsons Road for rezoning due to its size. Both properties are peri-urban 1 Judson Road adjoins Woodend's residential zone. Both properties are flat, free-draining, and of low-medium soil fertility. They are currently used for grazing, with urban proximity precluding intensive use. There is excellent access to main centres which avoids internal State Highway transit. A primary school is close with traffic light crossing, other town services are within walking/cycling distance. The properties are more compatible with GRZ than RLZ. Woodend is growing fast. The southern approach to Woodend is congested and unsafe with action overdue and inconsistent zoning. These properties are closer to Woodend's town centre, which has straggled northwards. Council focused on Rangiora and Kaiapoi when allocating 450ha of land for growth Woodend should have had 10% (50ha) of this, especially with Pegasus being almost fully occupied. Waka Kotahi's tentative plans (refer to submission for roundabout or lights controlled intersection solution plans) to upgrade State Highway 1 if the Bypass does not proceed, could partly encroach on 1 Judson Road and 331</p>	Section 10.4	Accept

						Woodend Beach Road. Submitter would support the roundabout option, which would involve negotiations for land acquisition for part of their property, although submitter would prefer their whole property is purchased. Submitter would prefer such an acquisition to be based on a residential zone property value. Rezone 1 Judson Road, Woodend and 328 Woodend Beach Road, Woodend from ?Rural Lifestyle Zone to General Residential Zone.		
217.1	FS 94	Woodend	FS Cheryl Anne Judson		Support			Accept

347.1		Woodend	Ravenswood Developments Limited (RDL)	General	Oppose	<p>Oppose notified zoning of Ravenswood as it is inconsistent with the established and planned development pattern for Ravenswood and this will complicate and/or misdirect the development of this fast-growing neighbourhood. The location and quantum of the Town Centre Zone will not facilitate town centre growth as a Key Activity Centre. Amend the planning maps:</p> <ul style="list-style-type: none"> - Rezone the established/consented residential areas (Stages 1-5) to General Residential Zone. - Rezone the undeveloped/planned residential areas (Stage 6) to Medium Density Residential Zone. - Rezone the following sites to Town Centre Zone (DP 521536 unless otherwise specified): <ul style="list-style-type: none"> - Lot 203 – large vacant lot south of Bob Robertson Drive - Lot 2 – New World - Lot 12 – Childcare centre - Lots 13 & 14 – Consented mixed retail - Lot 15 – Vacant - Lots 11 & 202 DP 545570 – vacant lots east of Garlick Street - Rezone the following sites to General Industrial Zone (DP 521536 unless otherwise specified): <ul style="list-style-type: none"> - Lots 100-135 – Industrial subdivision - Lots 9 & 10 – BP/McDonalds - Lot 201 – vacant lot north of BP/McDonalds - Lots 1 & 2 DP 545570 – Gull - Apply Open Space Zone to the riparian margins of the realigned Taranaki Stream, and the neighbourhood parks within Stage 1a and Stage 4. - Amend the zone boundaries to align with the roading and cadastral boundaries. <p>Refer to Appendix 1 in the full submission for the proposed rezoning.</p>	Section 12.1	Accept in part
347.93		Woodend	Ravenswood Developments Limited (RDL)	DEV-NWD-R1	Amend	<p>Updated reference to the replacement Outline Development Plans. Amend heading to "DEV-RW-R1 North Woodend Development Area Ravenswood Outline Development Plans".</p> <p>Retain the activity status as notified.</p>	Section 12.1	Reject

347.94		Woodend	Ravenswood Developments Limited (RDL) - Sarah Eveleigh - Anderson Lloyd	DEV-NWD-APP1	Oppose	<p>The large scale Outline Development Plan (ODP) replaces the outdated North Woodend ODP which does not reflect the current cadastral base and roading pattern, or the zoning outcome sought by this submission.</p> <p>The smaller scale ODP will guide the future development of the Ravenswood town centre and Key Activity Centre. Amend title to DEV-RW-APP1</p> <p>Replace with the following Outline Development Plans (ODPs):</p> <ul style="list-style-type: none"> - A large scale ODP for the wider Ravenswood development (residential and commercial areas) (Appendix 1). - A smaller scale ODP inset focusing on the Ravenswood commercial area (Appendix 1a). 	Section 12.1	Accept in part
13.1		Kaiapoi	Gregory David Murphy	General	Amend	Rezone 108 and 110 Williams Street for residential use as it is currently developed and used for residential purposes, there are no plans to remove the house or develop the site, and adjacent land at 112 Williams Street is zoned residential. Rezone 108 and 110 Williams Street for residential use.	Section 13.1	Reject
13.1	FS 80	Kaiapoi	Christchurch International Airport Ltd		Oppose			Accept
31.1		Kaiapoi	Darren Waine	General	Support	Rezone the East side of Williams Street to allow subdivision and dwellings to be built on as there is a shortage of land for residential and subdivision potential due to land size. Submitter has seen steady development in the top end of Kaiapoi, where Sovereign Palms sits today, and loss of rural outlook. The West side of Williams Street is zoned rural, but the East side is not quite one or the other. Request the Council incorporates the East side of Williams St (North of the Lakes) in its rezoning plan to allow subdivision of properties to build on.	Section 13.2	Reject
66.1		Kaiapoi	Philippa Novell	General	Oppose	Does not oppose Sutherland Drive new subdivision but seeks to have a strip of space retained between the new and existing properties to allow space for wildlife that live in the current field. Retain a strip of land between the new and existing properties to allow space for wildlife living in current field.	Section 13.1	

119.1		Kaiapoi	Steve Higgs	General	Oppose	<p>Would prefer the current open space in the Kaiapoi Special Purpose Zone on the south eastern side of Courtney Drive was maintained.</p> <p>Use of this land for community activity is appropriate, and support the land bounded by the southern bank of the Kaiapoi River and extending to Courtney Lake as Natural Open Space Zone (NOSZ) as a significant asset and walking/cycling linkages. Seek transition between residential, special purpose area and natural open space and require future development to respect current amenity with planning requirements and a high degree of openness.</p> <p>Seek further consideration to the range of activities that might occur on the balance of the regeneration area and how to treat the boundary to the NOSZ.</p> <ul style="list-style-type: none"> - Extend Open Space Zone to create continuous buffer for the residences on the south side of Courtney Drive. - SPZ(KR)-R32 - Motorised vehicles and SPZ(KR)-R33 Motorised sports facility should be non-complying as there is limited ability to achieve sufficient separation distances with surrounding residential areas. - Visitor accommodation should be of a similar scale to buildings related to other activities (200m2 - 250m2). - It is unclear how Retail activity areas relate to the building areas of other typical activities and why the maximum area of 400m2 is so high. - Support requirement of 75% native species and 10% of area (for activities requiring buildings). - Seek building setbacks and planning requirements along the NOSZ boundary of 20m. - 500m2 minimum subdivision standard is very intensive for land affected by earthquakes. Seek clarification on Council's intention to retain or sell this land to private interests. ?Extend the Natural Open Space Zone (NOSZ), currently north of the Special Purpose Zone - Kaiapoi Regeneration (SPZ(KR)), to include all of the south eastern section of the land between Courtney Drive/Courtney Lake and Courtney Stream. <p>Alternatively, if the SPZ(KR) is retained:</p> <ul style="list-style-type: none"> - Change activity status of motorised sports and events to non complying - Maintain visitor accommodation buildings at residential scale (250m2) - Limit potential retail activity size to the appropriate activity associated with the other dominant activities. - Increased building setback between the SPZ(KR) and the NOSZ with planning requirements in recognition of high natural area amenity. Prefer a 20 metre setback with planting/ landscaping requirements. - Extend the Open Space Zone around the remaining residence on The Oaks to provide separation between the residential building and SPZ(KR). 	Section 13.1	Accept
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119.2		Kaiapoi	Steve Higgs	General	Oppose	Extend the Open Space Zone (OSZ) to separate remaining residences adjoining the Special Purpose Zone - Kaiapoi Regeneration. The OSZ currently extends to the south residences on the southern side of Courtney Drive between Oaks Reserve and to The Oak. Extend the Natural Open Space Zone, currently north of the Special Purpose Zone - Kaiapoi Regeneration (SPZ(KR)), to include all of the south eastern section of the land between Courtney Drive/Courtney Lake and Courtney Stream. Alternatively if the SPZ(KR) is retained, extend the Open Space Zone around the remaining residence on The Oaks to provide separation between the residential building and SPZ(KR).	Section 13.1	Accept
121.1		Kaiapoi	Fusion Homes	General	Oppose	Rezone 261 Giles Road from Rural Lifestyle Zone to a Residential zoning (Medium Density or General Residential) and make all other necessary amendments to the Proposed District Plan are made to reflect the zoning sought. The property is Residential 7 Zone in the Operative District Plan and the proposed zoning is inconsistent with current zoning, is a significant change and does not reflect consultation with Council. Potential subdivision consultation was undertaken with Council for residential allotments with plans prepared for resource consent. Rezone 261 Giles Road from Rural Lifestyle Zone to Residential zoning.	Section 13.5	Reject
149.1		Rangiora	The Board of Trustees of Rangiora High School	General	Neutral	Generally supportive of proposed change of land use in the North East Rangiora (NER) Development Area as they are positive for the wider community that the school serves, and the Board owns land in the NER that is used for equine, agriculture, and horticulture education purposes. Land use for medium density residential will not be compatible with the educational purposes, and other possible land use provided for in the proposal will be consistent with the Board's objectives. Concerned about increasing reverse sensitivity from surrounding land owners towards the agricultural activities. These risks can be managed through carefully planned development activities and by ensuring that the land able to be used for educational purposes is not reduced. That the Council notes the Board's concerns and desire for continued engagement as development plans for surrounding land are finalised.	Section 7.2	Accept
149.1	FS 85	Rangiora	FS Bellgrove Rangiora Ltd		Support			Accept
149.1	FS 88	Rangiora	FS Kainga Ora		Oppose			Reject

206.1		Kaiapoi	Callum Ross - on behalf of Kainga Maha	General	Oppose	<p>Consider 71 Adderley Terrace, Kaiapoi is ideal for a higher density development such as that afforded by the Operative Area A rules or the Proposed Medium Density Residential Standards or, alternately, the design standards being promoted with the proposed amendment bill to the National Policy Statement on Urban Development 2020 (NPSUD). Support that higher density with lot sizes of 150m² are allowed in certain locations in the Silverstream subdivision, which integrates all wealth levels within a community.</p> <p>The site is zoned General Residential Zone which is essentially no different to operative. Up to 12 dwellings could be erected on this, compared to Medium Density Residential Zone which could provide over 20 dwellings, a significant increase in the housing supply for Kaiapoi.</p> <p>The NPSUD requires consenting authorities to allow for increased urban development and the Resource Management (enabling Housing Supply and Other Matters) Amendment Bill requires medium density residential standards in all residential zones. The Council is aware of the need for increased density as noted in the submission to the Bill which sought to place the required higher density within 1km of the Town Centre Zones where it will be served by public transport or areas where local schools and other social and community infrastructure have the capacity.</p> <p>This site, despite being over 1km from the Town Centre Zone, it is within 2km of the main commercial zone of Kaiapoi and on a road with a bus route. There is sufficient infrastructure to support an increase in density including open spaces, schools and local commercial activities. Rezone 71 Adderley Terrace, Kaiapoi to provide higher density living in Kaiapoi:</p> <p>a) Amend rules to reflect the Medium Density Residential Standards as proposed under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill b) Or alternatively, if the bill is rejected that the site be rezoned as Medium Density Residential Zone.</p>	Section 13.1	Accept in part
206.1	FS 80	Kaiapoi	FS Christchurch International Airport Ltd		Oppose			Reject

208.1		Kaiapoi	Suburban Estates Limited, Chris Wilson, Nick Auld, John Wakeman, Jane and Mary Wakeman, Ann Deans, WK Wakeman Estate, Air Charter Queenstown	General	Amend	<p>Rezone submitter's land in northern portion of Kaiapoi Development Area (refer to map in Appendix 3 of submission), located within northeast Kaiapoi, from Rural Lifestyle Zone to General Residential Zone.</p> <p>The certification process is unnecessary, uncertain, complex, and inflexible. The normal subdivision process is sufficient to achieve efficient development. Kaiapoi lacks sufficient land zoned for residential development with feasible development capacity to meet the short-term and medium-term housing demand. The 'Our Space' process established that Kaiapoi had sufficient greenfield priority area land for only one year and required additional land immediately, and even with all the Future Development Area land would still fall short of feasible housing development land by 2031. The Proposed District Plan addresses these issues to some extent, but a restrictive approach to land supply is not justified. The National Policy Statement on Urban Development (2020), and its predecessor - National Policy Statement on Urban Development Capacity (2016) are both relevant and support this submission. Rezone submitter's land in the northern portion of Kaiapoi Development Area (refer to map in Appendix 3 of original submission), located within north-east Kaiapoi, to General Residential Zone.</p> <p>Insert Outline Development Plan for the northern portion of Kaiapoi Development Area (refer to map in Appendix 3 of original submission).</p>	Section 13.3	Accept
208.1	FS 80	Kaiapoi	FS Christchurch International Airport Ltd		Oppose			Reject

239.1		Kaiapoi	Williams Waimak Ltd	General	Amend	<p>Oppose in part the Proposed District Plan, in particular, the site at Lot 1 DP 345997 and Lot 3 DP 40787 being zoned General Residential Zone (GRZ). The surrounding environment comprises business/industrial land to the north and east, with low residential and medium density developments along all other immediate boundaries.</p> <p>The submitter purchased the site in 2019, with the intention of developing for residential purposes.</p> <p>Amend the proposed zoning of Kaiapoi from GRZ to Medium Density Residential Zone (MRZ) so that it is generally consistent with the surrounding proposed MRZ environment.</p> <p>This would be a more cohesive and efficient use for this largely vacant land rather than retrospectively intensifying, currently the establishment of medium density housing would be a non-complying activity, this would be consistent with the National Policy Statement on Urban Development (2020), and would help alleviate the housing crisis. Amend the zoning of Kaiapoi from General Residential Zone (GRZ) to Medium Density Residential Zone (MRZ).</p> <p>Refer to Figure 4 in submission for proposed zoning map.</p>	Section 13.1	Reject
239.1	FS 80	Kaiapoi	FS Christchurch International Airport Ltd		Oppose			Accept
250.7		Kaiapoi	Survus Consultants Limited	General	Oppose	<p>Seek Kaiapoi Development Area to be rezoned for urban development in order to achieve sustainable growth and development of the District, meet the requirements of the National Policy Statement on Urban Development 2020, and achieve the purpose of the Resource Management Act 1991. Rezone Kaiapoi Development Area for urban development (General Residential Zone, or other appropriate zoning).</p>	Section 13.3	Accept
250.7	FS 63	Kaiapoi	FS Momentum Land Ltd		Support			Accept

257.1		Kaiapoi	W J Winter And Sons Ltd	General	Oppose	<p>Include 10ha of submitters property between Williams Street and Kakinui stream railway line within the future development zone / rezoned Medium Density Residential Zone. This would round off Kaiapoi to the south and fit in with river town vibe, and help with the housing shortage. Submitter's 24ha property at 170 main north road, is currently farmed but it is not of class 1 quality when compared to other land. Close proximity to housing can cause issues for all involved with farms creating dust, noise, smoke, odours. Accessing the property with large farm machinery become more difficult with increasing traffic on the main road. It also has very little in terms of improvements only 1 shed, stock yards, and irrigation main line. Insert a new Residential Development Area for South Kaiapoi over the following land:</p> <p>170 Main North Road part of (10ha Williams Street railway line section) 144 Main North Road</p>	Section 13.4	Reject
257.2		Kaiapoi	W J Winter And Sons Ltd	General	Oppose	<p>Notes long-standing issues with farming and lifestyle properties adjoining side by side/co-existing and the issues it can create with dust, noise, smoke and odours at all hours. Seek, and has since 1990s, that farming activities and associated operations are protected, not restricted and can continue, especially in the Rural Lifestyle Zone. This would enable benefit from investment which contributes to the local economy. Rezone from Rural Lifestyle Zone to Medium Density Residential Zone:</p> <p>170 Main North Road part of (10ha Williams St railway line section) 144 Main North Road</p>	Section 13.4	Reject
257.2	FS 80	Kaiapoi	FS Christchurch International Airport Ltd		Oppose			Accept
268.1		Kaiapoi	Paul Lupi	General	Amend	<p>The proposed General Residential Zone for South Kaiapoi and Silverstream is inconsistent with the proposal for Medium Density Residential Zone for the north side of Kaiapoi. It is also inconsistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement on Urban Development 2020 that require medium density development. Rezone all of the Kaiapoi urban area, including 71 Adderley Terrace to Medium Density Residential Zone.</p>	Section 13.1	Reject
268.1	FS 80	Kaiapoi	FS Christchurch International Airport Ltd		Oppose			Accept

275.83		Rangiora	Waka Kotahi NZ Transport Agency			Greenfield development within the Northwest Rangiora Development Area outside of the Projected Infrastructure Boundary is likely to encourage the use of private vehicle use, proposed pedestrian and cycle connections are limited and no public transport connections are identified. Amend Outline Development Plan to include better cycle and pedestrian connections.	Section 6.1	Contingent upon recommendations
288.1		Kaiapoi	Albert David Jobson	General	Oppose	<p>Object to future use being changed from its current rural use, due to:</p> <ul style="list-style-type: none"> - Increased risk to property from natural hazards including tsunami and flooding - Sufficient land available for future development west of Main North Road - Residents enjoy current wildlife, trees, rivers and lakes and overbuilding has an effect on waterways and wildlife. Leave the land zoned rural and seek other options for redevelopment areas in the Waimakariri district. 	Section 13.1	Reject
332.1		Kaiapoi	Mike Greer Homes Ltd	General	Amend	<p>Add a new Residential Development Area (SK - South Kaiapoi Development Area).</p> <p>Refer to full submission for Attachment A for a map of the proposed area, and Attachment B for a draft chapter for the development area, Outline Development Plan, and planning assessment.</p> <p>The planning assessment includes that the development will be based on Medium Density Residential Zone to yield 200 lots. There are opportunities for open space and it will integrate with Kaiapoi via transport links and reserves. Upgrades to services will be required and localised flooding addressed. It meets criteria for residential growth of Kaiapoi due to it adjoining the south eastern boundary and is a logical and efficient extension to existing residential area. Demand for housing has grown significantly and it is necessary to develop additional blocks of land to enable housing choice and meet requirements under the National Policy Statement 2020. Add a new Residential Development Area (SK – South Kaiapoi Development Area) over the following land:</p> <ul style="list-style-type: none"> - Pt RS 37428 (CB701/7) limited to the land to the west of the Main Trunk Railway Line - RS 39673 - Lot 1 DP 19366 <p>Refer to full submission for Attachment A for a map of the proposed area, and Attachment B for a draft chapter for the development area, Outline Development Plan, and planning assessment.</p>	Section 13.4	Reject

332.1	FS 80	Kaiapoi	FS Christchurch International Airport Ltd		Oppose			Accept
332.2	FS 80	Kaiapoi	Mike Greer Homes Ltd - Patricia Harte	General	Amend	<p>Add a new Residential Development Area (SK - South Kaiapoi Development Area).</p> <p>Refer to full submission for Attachment A for a map of the proposed area, and Attachment B for a draft chapter for the development area, Outline Development Plan, and planning assessment.</p> <p>The planning assessment includes that the development will be based on Medium Density Residential Zone to yield 200 lots. There are opportunities for open space and it will integrate with Kaiapoi via transport links and reserves. Upgrades to services will be required and localised flooding addressed. It meets criteria for residential growth of Kaiapoi due to it adjoining the south eastern boundary and is a logical and efficient extension to existing residential area. Demand for housing has grown significantly and it is necessary to develop additional blocks of land to enable housing choice and meet requirements under the National Policy Statement 2020. Rezone to Medium Density Residential Zone from Rural Lifestyle Zone:</p> <ul style="list-style-type: none"> - Pt RS 37428 (CB701/7) limited to the land to the west of the Main Trunk Railway Line - RS 39673 - Lot 1 DP 19366 <p>Refer to full submission for Attachment A for a map of the proposed area, and Attachment B for a draft chapter for the development area, Outline Development Plan, and planning assessment.</p>	Section 13.4	Reject
367.20		Kaiapoi	Waimakariri District Council	General	Oppose	Rezone 261 Giles Road (Lot 1 DP482329) from Rural Lifestyle Zone to General Residential Zone. This is to better reflect the current Residential 7 zoning of the property in the Operative Plan. The property was missed off the final map due to a GIS error. Rezone the property at 261 Giles Road (Lot 1 DP 482329) from Rural Lifestyle Zone to General Residential Zone.	Section 13.5	Reject
59.1		Uncertain	Chaoting Ni and Luyan Qian	General	Amend	Rezone property from Rural Residential 4B to Residential 2 and will participate in, and contribute to, plans for rezoning the area. Would like to be informed of updates. The big plan for the whole area.	Section 6.3	Reject

128.1		Other	Karl Lutterman	General	Amend	<p>The driveway of 257 Tuahiwi Road is in the PREC(T) zone and adjoins an approximate 1904m² Rural/SPZ(KN) zone which is less suitable for rural activity because</p> <ul style="list-style-type: none"> - The zone amendment area is detached from the main productive land due to the Council drainage ditch forming a natural boundary. - The SPZ(KN) area at 243 Tuahiwi Rd is landscaped, planted with specimen trees, and used for residential purposes. - The zone amendment area is in a pocket of residential property restricting land activity for rural use. - Amending the PREC(T) zone at 257 Tuahiwi Rd minimises future rural-residential conflicts and is a natural fit with existing residential properties. - Historic and current Council studies predict growth for the Tuahiwi Precinct area, the pandemic is a further catalyst creating growth demands, the zone amendment supports growth. - Neighbouring descendants of Ngai Tuahuriri have enquired if the amendment area could be sold, amending the zone increases possible settlement options for Ngai Tuahuriri whakapapa. - During 2014 the Council Action 21 Land Use Recovery Plan (LURP) proposed rezoning all of the 257 Tuahiwi Rd property to Residential 3. Amend the Planning Maps to extend the PREC(T) Zone in the 257 Tuahiwi Road driveway west to the Council drain crossing 257 Tuahiwi Road. 	Section 13.6	Reject
184.1	Martin Pinkham	MRZ - Medium Density Residential Zone	Objectives	MRZ-O1	Oppose	Rezoning all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-O1, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject
184.10	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R8	Oppose	Rezoning all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-R8, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject
184.11	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R9	Oppose	Rezoning all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-R9, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject

184.12	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R10	Oppose	Rezone all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-R10, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject
184.13	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R11	Oppose	Rezone all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-R11, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject
184.14	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R12	Oppose	Rezone all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-R12, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject
184.15	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R13	Oppose	Rezone all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-R13, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject
184.16	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R14	Oppose	Rezone all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-R14, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject
184.17	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R15	Oppose	Rezone all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-R15, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject
184.18	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R16	Oppose	Rezone all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-R16, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject

184.19	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R17	Oppose	Rezone all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-R17, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject
184.2	Martin Pinkham	MRZ - Medium Density Residential Zone	Policies	MRZ-P1	Oppose	Rezone all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-P1, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject
184.20	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R18	Oppose	Rezone all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-R18, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject
184.21	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R19	Oppose	Rezone all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-R19, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject
184.22	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R20	Oppose	Rezone all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-R20, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject
184.23	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R21	Oppose	Rezone all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-R21, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject
184.24	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R22	Oppose	Rezone all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-R22, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject

184.25	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R23	Oppose	Rezone all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-R23, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject
184.26	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R24	Oppose	Rezone all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-R24, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject
184.27	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R25	Oppose	Rezone all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-R25, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject
184.28	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R26	Oppose	Rezone all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-R26, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject
184.29	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R27	Oppose	Rezone all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-R27, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject
184.3	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R1	Oppose	Rezone all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-R1, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject
184.30	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R28	Oppose	Rezone all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-R28, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject

184.31	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R29	Oppose	Rezone all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-R29, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject
184.32	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R30	Oppose	Rezone all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-R30, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject
184.33	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R31	Oppose	Rezone all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-R31, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject
184.34	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R32	Oppose	Rezone all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-R32, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject
184.35	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R33	Oppose	Rezone all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-R33, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject
184.36	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R34	Oppose	Rezone all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-R34, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject
184.37	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R35	Oppose	Rezone all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-R35, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject

184.38	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R36	Oppose	Rezone all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-R36, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject
184.39	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R37	Oppose	Rezone all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-R37, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject
184.4	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R2	Oppose	Rezone all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-R2, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject
184.40	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R38	Oppose	Rezone all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-R38, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject
184.41	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R39	Oppose	Rezone all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-R39, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject
184.42	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R40	Oppose	Rezone all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-R40, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject
184.43	Martin Pinkham	MRZ - Medium Density Residential Zone	Built Form Standards	MRZ-BFS1	Oppose	Rezone all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-BFS1, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject

184.44	Martin Pinkham	MRZ - Medium Density Residential Zone	Built Form Standards	MRZ-BFS2	Oppose	Rezone all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-BFS2, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject
184.45	Martin Pinkham	MRZ - Medium Density Residential Zone	Built Form Standards	MRZ-BFS3 Landscap	Oppose	Rezone all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-BFS3, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject
184.46	Martin Pinkham	MRZ - Medium Density Residential Zone	Built Form Standards	MRZ-BFS4	Oppose	Rezone all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-BFS4, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject
184.47	Martin Pinkham	MRZ - Medium Density Residential Zone	Built Form Standards	MRZ-BFS5	Oppose	Rezone all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-BFS5, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject
184.48	Martin Pinkham	MRZ - Medium Density Residential Zone	Built Form Standards	MRZ-BFS6	Oppose	Rezone all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-BFS6, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject
184.49	Martin Pinkham	MRZ - Medium Density Residential Zone	Built Form Standards	MRZ-BFS7	Oppose	Rezone all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-BFS7, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject
184.5	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R3	Oppose	Rezone all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-R3, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject

184.50	Martin Pinkham	MRZ - Medium Density Residential Zone	Built Form Standards	MRZ-BFS8	Oppose	Rezone all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-BFS8, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject
184.51	Martin Pinkham	MRZ - Medium Density Residential Zone	Built Form Standards	MRZ-BFS9	Oppose	Rezone all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-BFS9, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject
184.6	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R4	Oppose	Rezone all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-R4, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject
184.7	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R5	Oppose	Rezone all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-R5, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject
184.8	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R6	Oppose	Rezone all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-R6, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject
184.9	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R7	Oppose	Rezone all of the Kaiapoi urban area to Medium Residential Zone along with all of the Policies, Rules, and Built Form Standards including MRZ-R7, to be consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill and the National Policy Statement - Urban Development.	Section 13.6	Reject

193.1	Martin Pinkham	MRZ - Medium Density Residential Zone	Objectives	MRZ-O1	Oppose	Suggests Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way in regards to the risk of flooding in the Kaiapoi Urban Area and should be extended to include the proposed Rangiora to Woodend Medium Density Residential Zone. The Proposed District Plan fails to provide adequate Residential housing to meet the expected growth of the district over the next ten years. It is inconsistent with the National Policy Statement on Urban Development to facilitate medium density development, and is inconsistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject
193.10	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R8	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next ten years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject
193.11	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R9	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next ten years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject
193.12	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R10	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next ten years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject

193.13	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R11	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next 10 years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject
193.14	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R12	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next 10 years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject
193.15	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R13	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next 10 years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject
193.16	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R14	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next 10 years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject

193.17	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R15	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next 10 years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject
193.18	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R16	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next 10 years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject
193.19	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R17	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next 10 years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject
193.2	Martin Pinkham	MRZ - Medium Density Residential Zone	Policies	MRZ-P1	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next ten years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject

193.20	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R18	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next 10 years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject
193.21	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R19	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next 10 years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject
193.22	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R20	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next 10 years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject
193.23	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R21	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next 10 years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject

193.24	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R22	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next 10 years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject
193.25	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R23	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next 10 years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject
193.26	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R24	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next 10 years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject
193.27	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R25	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next 10 years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject

193.28	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R26	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next 10 years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject
193.29	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R27	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next 10 years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject
193.3	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R1	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next ten years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject
193.30	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R28	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next 10 years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject

193.31	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R29	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next 10 years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject
193.32	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R30	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next 10 years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject
193.33	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R31	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next 10 years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject
193.34	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R32	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next 10 years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject

193.35	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R33	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next 10 years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject
193.36	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R34	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next 10 years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject
193.37	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R35	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next 10 years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject
193.38	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R36	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next 10 years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject

193.39	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R37	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next ten years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject
193.4	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R2	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next ten years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject
193.40	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R38	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next ten years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject
193.41	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R39	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next ten years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject

193.42	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R40	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next ten years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject
193.43	Martin Pinkham	MRZ - Medium Density Residential Zone	Built Form Standards	MRZ-BFS1	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next ten years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject
193.44	Martin Pinkham	MRZ - Medium Density Residential Zone	Built Form Standards	MRZ-BFS2	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next ten years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject
193.45	Martin Pinkham	MRZ - Medium Density Residential Zone	Built Form Standards	MRZ-BFS3	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next ten years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject

193.46	Martin Pinkham	MRZ - Medium Density Residential Zone	Built Form Standards	MRZ-BFS4	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next ten years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject
193.47	Martin Pinkham	MRZ - Medium Density Residential Zone	Built Form Standards	MRZ-BFS5	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next ten years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject
193.48	Martin Pinkham	MRZ - Medium Density Residential Zone	Built Form Standards	MRZ-BFS6	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next ten years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject
193.49	Martin Pinkham	MRZ - Medium Density Residential Zone	Built Form Standards	MRZ-BFS7	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next ten years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject

193.5	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R3	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next ten years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject
193.50	Martin Pinkham	MRZ - Medium Density Residential Zone	Built Form Standards	MRZ-BFS8	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next ten years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject
193.51	Martin Pinkham	MRZ - Medium Density Residential Zone	Built Form Standards	MRZ-BFS9	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next ten years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject
193.6	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R4	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next ten years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject

193.7	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R5	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next ten years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject
193.8	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R6	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next ten years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject
193.9	Martin Pinkham	MRZ - Medium Density Residential Zone	Activity Rules	MRZ-R7	Oppose	Considers Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend Medium Residential Zone. Notes the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next ten years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.	Section 13.6	Reject

193.53		Other	Martin Pinkham	General	Amend	<p>Rezone an area (refer to map in full submission) approximately located between Rangiora and Woodend and including Waikuku, as Medium Density Residential Zone (MRZ).</p> <p>Note the Proposed District Plan fails to provide adequate residential housing to meet the expected growth of the District over the next ten years. It is inconsistent with the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.</p> <p>Kaiapoi Fixed Minimum Finished Floor Level Overlay is a sensible and pragmatic way of dealing with risk of flooding in the Kaiapoi Urban Area that provides certainty to landowners and developers and should be extended to include the proposed Rangiora to Woodend MRZ. Rezone an area (refer to map in full submission) approximately located between Rangiora and Woodend and including Waikuku, as Medium Density Residential Zone (MRZ).</p> <p>Implement Kaiapoi Fixed Minimum Finished Floor Level Overlay methodology as detailed in NH-R6 to the proposed Rangiora to Woodend MRZ.</p>	Section 13.6	Reject
193.53	FS 79	Other	FS Ravenswood Developments Ltd		Part Allow/Disallow			Accept

287.1		Other	Remi Leblanc	General	Amend	<p>Request a Special Purpose Zone - Lifestyle Village to include:</p> <p>Stage one: Total 114.9913ha 84 Marchmont Road: 28.4463ha 62 Coldstream Road: 17.0249ha 84 Smarts Road: 18.243ha 88 Smarts Road: 41.2905ha 326 Gressons Road: 9.0866ha</p> <p>Stage two: Total 36.6858 ha 44 Marchmont Rd: 11.4464ha 476 Rangiora -Woodend Rd: 25.2394ha See attachments for map of proposal. Request identified areas in submission be zoned Special Purpose Zone - Lifestyle Village instead of proposed Rural Lifestyle Zone (RLZ).</p> <p>Housing which complies to the new Medium Density National Policy Statement would be allowed as a Permitted Activity. Request retail activities be a permitted activity and retirement village activities across the entire RLZ zone (not just this area).</p> <p>The intended use of the zoning is a large scale community development for occupants 55 years and over, to provide much needed affordable retirement housing. The homes would be mainly freehold titles, and largely self contained for infrastructure. 2000 homes in Stage One and 600 in Stage Two allows a large range of amenities to be offered.</p>	Section 13.6	Reject
287.1	FS 79	Other	FS Ravenswood Development Ltd		Oppose			Accept
287.1	FS 90	Other	FS Rachel Hobson and Bernard Whimp		Support			Reject

Appendix C. Report Author's Qualifications and Experience

I hold the following qualifications:

- Master of Planning (MPlan) and Bachelor of Physical Geography (BSc) from the University of Otago.

I am an intermediate member of the New Zealand Planning Institute. I am a certified hearings commissioner. I have 18 years' experience in working as a planner for local, central government, private consultancy, and a range of non-government organisations.

My work experience includes:

- Statutory, RMA, and recreation planning for the Department of Conservation.
- Consent planning for the Waitaki District Council.
- Extensive affected party, policy planning, Environment Court case management and litigation, central government liaison, and freshwater science experience with regional Fish and Game Councils and the New Zealand Fish and Game Council.
- Principal advisor (water) for Federated Farmers of New Zealand.
- Private consultancy, primarily on conservation and recreation planning issues to a range of non-government organisation and trust clients.
- Private aquaculture and geospatial businesses.

I have worked on planning matters across all New Zealand.

I have been employed by the Waimakariri District Council between August 2022 and December 2023 as a senior planner, and since January 2024 as a principal planner.

Conflict of interest statement

In my role at Federated Farmers of New Zealand, I was the primary author of its submission on the PDP. I understand that this is a potential conflict of interest that requires declaration. Whilst I have no direct interest or benefit or gain from the outcome of the submission, not being from a farming background and also being a new resident to the district (and region) since employment by Council, I have undertaken to:

- a) Not be the reporting officer on the rural chapter
- b) Ensuring that any other work that handles the Federated Farmers submission is checked and reviewed.
- c) Not participating in consultation and engagement with Federated Farmers, except with another staff member present.

I notified my employer, the Waimakariri District Council, of this prior to employment

Qualifications in respect of geospatial modelling

I have 15 years of experience in geospatial modelling and programming, particularly open source techniques and spatial SQL, and 25 years of experience in associated computer programming.

Appendix D. Legal Advice on Urban Environment

9 May 2024

To

Peter Wilson and Andrew Willis
Waimakariri District Council
Private Bag 1005
Rangiora 770

Copy to

Matthew Bacon

From

Cedric Carranceja
Jenna Silcock

By Email

andrew.willis@wmk.govt.nz
peter.wilson@wmk.govt.nz
matthew.bacon@wmk.govt.nz

Dear Peter and Andrew

Waimakariri Proposed District Plan – Definition of urban environment

1. The residential rezoning hearings on the Waimakariri Proposed District Plan (**Proposed Plan**) are scheduled to occur in July 2024. To inform Council officers' preparation of section 42A reports for the residential rezoning hearings, you have asked us for advice regarding the definition of "urban environment" in the National Policy Statement on Urban Development 2020 (**NPS-UD**).
2. More specifically, you have asked:
 - (a) Who determines whether an area is "*intended to be*" predominantly urban in character and part of a housing and labour market of 10,000 people for the purposes of defining an "urban environment" under the NPS-UD? Is it the local authority or can it be anybody?
 - (b) Is Table 1 in the Appendix to the NPS-UD relevant to determining what and where an 'urban environment' is, and if so, how?
 - (c) If there is inconsistency between the NPS-UD and the Canterbury Regional Policy Statement (**CRPS**), for example, in terms of where or how an "urban environment" is to be identified, then how is this to be reconciled in a district plan?
3. As will become evident in considering this letter, to answer your specific questions, it was necessary for us to comment on wider related issues arising from the NPS-UD and the Amendment Act, including in relation to explaining the differing purposes and functions of the NPS-UD and the Amendment Act.
4. As a summary response to your specific queries, we consider that:
 - (a) The person who determines what is "*intended to be*" predominantly urban in character and part of a housing and labour market of 10,000 people for the purposes of defining an "urban environment" under the NPS-UD is dependent on the particular purpose and context that the

phrase "urban environment" is used in the NPS-UD. Although in some cases, such intention will be that of Council (e.g. when preparing a future development strategy under the NPS-UD), that intention could be held by any person for the purposes of policy 8 of the NPS-UD, which anticipates such person having the opportunity to demonstrate, through a submission or private plan change, with associated evidence, their intention for an area of land to be predominantly urban in character and part of a housing and labour market of 10,000 people.

- (b) Tables 1 and 2 in the Appendix to the NPS-UD do not demarcate the boundaries of the various Tier 1 and Tier 2 urban environments listed in those tables. However, they provide relevant context that must be considered in ascertaining what and where those urban environments are, on a case-by-case basis, having regard to context, evidence and purpose.
- (c) The Waimakariri District Plan needs to "give effect to" both the NPS-UD and the CRPS. The Supreme Court decisions in *King Salmon*¹ and *Port of Otago*² identified principles as to how higher order documents should be given effect to as part of plan change processes. The starting point is whether there is a conflict between the NPS-UD and the CRPS. In our view, the references to "Greater Christchurch urban environment" and "Greater Christchurch Tier 1 urban environment" in the CRPS do not define the "urban environment" for the NPS-UD. Therefore, an inconsistency with the NPS-UD "urban environment" definition does not arise. If there was a direct conflict which cannot be reconciled, then the NPS-UD would prevail over the CRPS.

5. In preparing our advice we have had regard to:

- (a) The two Joint Witness Statements – Urban Environment (Planning), for Day 1 dated 26 March 2024 and Day 2 dated 26 March 2024 (together referred to as **JWS**);
- (b) Extracts from other Independent Hearing Panel (**IHP**) decisions including the Selwyn District Council IPI Hearing Panel's decision on Rezoning Requests – Rolleston and the Independent Hearing's Panel's report to the councillors of the Kāpiti Coast District Council on Plan Change 2 under RMA Schedule 1, Part 6, clause 100 dated 20 June 2023; and
- (c) Relevant case law.

6. This advice covers a number of complex issues which have also been the subject of considerable thought and discussion by the Council team and other planning experts. The JWS illustrate that there are a range of opinions on relevant matters. While we have considered the JWS, we do not specifically comment on all matters expressed in the JWS but have sought to concentrate on salient points directly relevant to the queries you have raised (as summarised at paragraph 2 above).

7. We outline the reasons for our views below. Given the number of questions addressed, and length of the advice, we have provided a road map of the advice below:

- (a) Approach to interpretation is addressed at paragraphs 8 to 11;

¹ *Environmental Defence Society Inc v New Zealand King Salmon Company Ltd* [2014] NZSC 38; 1 NZLR 593.

² *Port Otago Limited v Environmental Defence Society* [2023] NZSC 112

- (b) Who determines whether an area is "*intended to be*" predominantly urban in character and part of a housing and labour market of 10,000 people for the purposes of defining an "urban environment" under the NPS-UD is addressed at paragraphs 12 to 30;
- (c) The relevance of Table 1 in the Appendix to the NPS-UD to determining what and where an 'urban environment' is addressed at paragraphs 31 to 47;
- (d) If there is inconsistency between the NPS-UD and CRPS how this to be reconciled in a district plan is addressed at paragraphs 48 to 58.

Approach to interpretation

8. Your query raises issues of interpretation of the NPS-UD and the RMA (as amended by the Amendment Act). The Courts ascertain the meaning of statutory instruments and plan provisions from their text and in light of their purpose.³ The Courts strive to give a provision its plain and ordinary meaning. However, regard needs to be had to the immediate context and, where any ambiguity, obscurity or absurdity arises, it may also be necessary to refer to other sections of the instrument or plan to derive a purposive interpretation.⁴
9. When interpreting provisions of a planning instrument, relevant factors to consider include:
 - (a) The text of the relevant provision in its immediate context;
 - (b) The purpose of the provision;
 - (c) The context and scheme of the plan and any other indications in it;
 - (d) The history of the plan;
 - (e) The purpose and scheme of the RMA;
 - (f) Any other permissive guides to meaning.⁵
10. Furthermore, when competing interpretations of a planning instrument are available, the interpretation ought to:
 - (a) Avoid absurdity or anomalous outcomes;
 - (b) Be consistent with the expectations of property owners; and
 - (c) Promote administrative practicality (e.g. rather than requiring lengthy historical research to assess lawfulness or otherwise).⁶
11. We have adopted the above approach to interpretation in this opinion.

³ Section 5 of the Interpretation Act 1999.

⁴ See for example, *Powell v Dunedin City Council* [2005] NZRMA 174 (CA); *Lower Hutt City Council (Re an Application)* (W46/07); *Nanden v Wellington City Council* [2000] NZRMA 562; *North Canterbury Clay Target Association Inc v Waimakariri District Council* [2014] NZHC 3021 at [17] – [18].

⁵ *Queenstown River Surfing Ltd v Central Otago District Council* [2006] NZRMA 1 at [7].

⁶ *Nanden v Wellington City Council* [2000] NZRMA 562; *Mount Field Limited v Queenstown Lakes District Council* 31 October 2008, Heath J, HC Invercargill CIV 2007-428-700.

Who determines whether an area is "*intended to be*" predominantly urban in character and part of a housing and labour market of 10,000 people for the purposes of defining an "urban environment" under the NPS-UD?

12. In order to answer your specific query about who determines whether an area is "*intended to be*" predominantly urban in character and part of a housing and labour market of 10,000 people for the purposes of defining an "urban environment" under the NPS-UD, it is necessary to comment on the wider purpose and context of the NPS-UD.

The meaning of the "urban environment" within the purpose and context of the NPS-UD

13. The NPS-UD definition of "urban environment" is:

urban environment means any area of land (regardless of size, and irrespective of local authority or statistical boundaries) that:

- (a) is, or is intended to be, predominantly urban in character; and
(b) is, or is intended to be, part of a housing and labour market of at least 10,000 people.

[our underlining for emphasis]

14. As noted above, the Courts strive to give provisions their plain and ordinary meaning. The plain ordinary meaning of "urban environment" clearly seeks to capture land that is predominantly urban in character and part of a housing and labour market of at least 10,000 people. The definition also applies to land that is intended to be predominantly urban in character and part of a housing and labour market of at least 10,000 people. While the plain and ordinary meaning of the phrase "intended to be" is generally understood as referring to someone specifically planning or contemplating something (such as an outcome), the definition of urban environment does not specify who must hold the requisite intention. Thus, it is unclear from the definition whether an "urban environment" can include land that, for example, only a local authority intends to be predominantly urban in character and part of a housing and labour market of at least 10,000 people, or whether that intention can be held by any person at all.
15. As noted above, purpose and context are relevant to interpreting the meaning of provisions in a planning instrument. As the phrase "urban environment" in the NPS-UD serves different purposes within different contexts of the NPS-UD, these will need to be separately considered to ascertain how "urban environment" is to be interpreted. We note two specific purposes and contexts as examples below.

What is the "urban environment" for the purposes of a future development strategy and a housing development capacity assessment?

16. In some cases, the relevant context and purpose makes clear that an "urban environment" is confined to what is, or what the relevant local authority intends to be, predominantly urban in character and part of a housing and labour market of at least 10,000 people. For example, when preparing a future development strategy (**FDS**) for an "urban environment":
- (a) Clauses 3.12(1) and 3.12(3) confirm that it is tier 1 and 2 local authorities who are required to prepare an FDS (individually or jointly) for relevant tier 1 and 2 "urban environments".

- (b) Clause 3.13(1)(a)(i) provides that the purpose of an FDS is to promote long-term strategic planning by setting out:

"how a local authority intends to...achieve well-functioning urban environments in its existing and future urban areas".

[our underlining for emphasis]

17. In our view, the above clauses confirm that the requisite intention for an "urban environment" for the purposes of preparing an FDS must be held the relevant local authority (rather than any person), because the FDS sets out how the local authority intends to achieve well-functioning urban environments in the local authority's existing and future urban areas. Thus, within the context and purpose of an FDS, an "urban environment" is limited to what is, or what the relevant local authority intends to be, predominantly urban in character and part of a housing and labour market of at least 10,000 people. We have found nothing in the wider context of the NPS-UD to suggest local authorities must set out in an FDS how any and all persons might intend to achieve well-functioning urban environments within what all such persons might consider to be future urban areas.
18. Similarly, and by way of further example, we consider clause 3.25 (which requires a housing development capacity assessment for a tier 1 "urban environment" that is "plan-enabled") and the definition of "plan-enabled" (in clause 3.4(1)) anticipate that the requisite intention for an "urban environment" for the purposes of preparing a housing development capacity assessment must be held by the relevant local authority. Something that is identified as "plan-enabled" represents what the local authority intends to enable through that relevant plan.

What is the "urban environment" for the purposes of policy 8 of the NPS-UD?

19. In our opinion, the requisite intention for an "urban environment" for the purposes of implementing policy 8 of the NPS-UD is different from an FDS. NPS-UD policy 8 states:

Policy 8: *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 with planned land release.

[our underlining for emphasis]

20. In our view, there is nothing in the context of policy 8 to suggest that the requisite intention for an "urban environment" for policy 8 to apply must only be held by a local authority. Rather, the context and purpose, as reinforced by clause 3.8 of the NPS-UD, better supports an interpretation of "urban environment" that allows for any person to have the requisite intention, as it will then enable policy 8 of the NPS-UD to fulfil its intent of requiring local authority decision-making affecting "urban environments" to be responsive plan changes for unanticipated or out-of-sequence developments.
21. If the phrase "urban environments" in policy 8 was read down so that it could only ever apply to areas of land intended by a *local authority* (but not any other person) to be predominantly urban in character and part of a housing and labour market of at least 10,000 people, then that would significantly reduce the effect of policy 8, because it could only ever apply local authority decisions affecting those areas where local authorities have intended to be predominantly urban in character

and part of a housing and labour market of at least 10,000 people as reflecting in RMA planning documents (which is defined to include regional policy statements, regional plans and district plans).

22. In our view, policy 8 intends that a person other than a local authority (e.g. a developer) can be a plan change proponent or a submitter, and that proponent/submitter can have the opportunity to demonstrate via evidence presented in support of that plan change proposal or submission, their intent that the plan change land area will be *predominantly urban in character and part of a housing and labour market of at least 10,000 people*, even where urbanisation of that relevant land is not intended (or anticipated) by any local authority in their RMA planning documents (including the CRPS and any district plans).

Does the more recent definition of "urban environment" in section 77F the RMA change things?

23. The definition of "urban environment" in the NPS-UD has been in force since 20 August 2020. Just over a year later (on 20 December 2021), the Amendment Act introduced a definition of "urban environment" into the RMA that differs from the definition of that term in the NPS-UD. Notably, the Government has not, either via the Amendment Act or through other means, sought to align the definition of "urban environment" in the NPS-UD with that in the RMA.

24. In contrast to the definition of "urban environment" in the NPS-UD, the definition of "urban environment" in section 77F of the RMA is specifically limited to require the requisite intention to be held by a specified territorial authority:

urban environment means any area of land (regardless of size, and irrespective of local authority or statistical boundaries) that:

- (a) is, or is intended by the specified territorial authority to be, predominantly urban in character; and
- (b) is, or is intended by the specified territorial authority to be, part of a housing and labour market of at least 10,000 people

[our underlining for emphasis]

25. We consider the RMA definition of "urban environment" is deliberately and materially different from the NPS-UD, as it serves a very specific purpose in the context of the RMA as recently amended by the Amendment Act.
26. Section 77F of the RMA confirms that the RMA definition of "urban environment" applies only for the purposes of sections 77G to 77T and Schedule 3A of the RMA. Sections 77G to 77T and Schedule 3A were introduced by the Amendment Act to require "specified local authorities" to bring in new intensification requirements (including applying new medium density residential standards in residential zones). The definition of "specified local authorities" was also introduced into section 2 of the RMA by the Amendment Act.⁷

⁷ Amended section 2 of the RMA now includes the following definition:

"**specified territorial authority** means any of the following:

- (a) every tier 1 territorial authority;
- (b) a tier 2 territorial authority that is required by regulations made under section 80I(1) to prepare and notify an IPI;
- (c) a tier 3 territorial authority that is required by regulations made under section 80K(1) to prepare and notify an IPI"

27. In our view, the purpose of, and the context provided by the Amendment Act supports a conclusion that the phrase "by the specified territorial authority" was deliberately included in clauses (a) and (b) of the RMA definition of "urban environment" to clarify and confine the scope of the new intensification requirements that "specified territorial authorities" must implement when promulgating an intensification planning instrument (**IPI**). In particular, the obligation under Amendment Act on specified territorial authorities is to use an IPI to implement the Amendment Act's intensification directives within land that is, or is intended by a "specified territorial authority" to be, predominantly urban in character and part of a housing and labour market of at least 10,000 people, but not to land that others intend to be predominantly urban in character and part of a housing and labour market of at least 10,000 people.
28. The deliberateness of the RMA having a different definition of "urban environment" from the NPS-UD is supported by the fact that the Amendment Act did not change the NPS-UD definition of "urban environment", despite the Amendment Act requiring changes to other parts of the NPS-UD (policy 3) via new section 77S(1).
29. Furthermore, the Minister for the Environment has not exercised powers under sections 53(2) and 77S(2) to change the NPS-UD to remove inconsistencies or potential inconsistencies between the NPS-UD and the Amendment Act. This also suggests the difference in the two definitions of "urban environment" is intended, and not an inconsistency requiring correction.
30. Accordingly, the definition of "urban environment" in the RMA is specific to promulgating an IPI under the Amendment Act, and does not alter that under the NPS-UD:
 - (a) For the purposes of an FDS and a housing development capacity assessment, an "urban environment" is limited to what is, or what the relevant local authority intends to be, predominantly urban in character and part of a housing and labour market of at least 10,000 people.
 - (b) For the purposes of policy 8 of the NPS-UD, a person other than a local authority (e.g. a developer) has the opportunity to demonstrate via evidence presented in support of a plan change proposal or submission, that they have the requisite intention that the land they seek to develop will be "*predominantly urban in character*" and "*part of a housing and labour market of at least 10,000 people*", even where urbanisation of that relevant land is not intended (or anticipated) by any local authority in their RMA planning documents (including the CRPS and any district plans).

Is Table 1 in the Appendix to the NPS-UD relevant to determining what and where an ‘urban environment’ is, and if so, how?

31. The Appendix in the NPS-UD is entitled "Tier 1 and tier 2 urban environments and local authorities". Within the Appendix is Table 1 which provides:

Table 1

Tier 1 urban environment	Tier 1 local authorities
Auckland	Auckland Council
Hamilton	Waikato Regional Council, Hamilton City Council, Waikato District Council, Waipā District Council
Tauranga	Bay of Plenty Regional Council, Tauranga City Council, Western Bay of Plenty District Council
Wellington	Wellington Regional Council, Wellington City Council, Porirua City Council, Hutt City Council, Upper Hutt City Council, Kāpiti Coast District Council
Christchurch	Canterbury Regional Council, Christchurch City Council, Selwyn District Council, Waimakariri District Council

32. Table 1 should be considered alongside the following definitions in clause 1.4 of the NPS-UD that specifically refer to the NPS-UD Appendix:

***tier 1 local authority:** means each local authority listed in column 2 of table 1 in the Appendix, and **tier 1 regional council** and **tier 1 territorial authority** have corresponding meanings*

***tier 1 urban environment** means an urban environment listed in column 1 of table 1 in the Appendix*

***tier 3 urban environment** means an urban environment that is not listed in the Appendix*

[our underlining for emphasis]

33. The following can be observed from a consideration of Table 1 and the above definitions:

- (a) "Christchurch" is a tier 1 urban environment. However, neither Table 1 nor anything else in the NPS-UD demarcates or otherwise specifies what constitutes the Christchurch tier 1 urban environment in terms of the area(s) it covers by location(s) and spatial extent. The NPS-UD does not, for example, state that the "Christchurch" tier 1 urban environment is the whole of "Greater Christchurch" as defined in the CRPS, or that it is only those parts of "Greater Christchurch" identified in Map A of the CRPS as existing urban areas and/or priority areas and/or future development areas and/or areas within a projected infrastructure boundary. The CRPS, Map A, or any other planning document (e.g. the Waimakariri District Plan) is not mentioned in the NPS-UD as the source for defining what is the "Christchurch" is a tier 1 urban environment.
- (b) Waimakariri District Council is mentioned in column 2 of Table 1 as one of four Tier 1 local authorities for the Christchurch Tier 1 urban environment, which implies that the Christchurch Tier 1 urban environment must include areas that fall within the jurisdiction of all four local authorities. Thus, the Christchurch Tier 1 urban environment cannot be confined to a single district, such as within the district of Christchurch City, but rather, there will be parts of the Christchurch Tier 1 urban environment that must fall within the Waimakariri District.

- (c) As the definition of "tier 1 urban environment" refers to an "urban environment", the "Christchurch" tier 1 urban environment must be also an "urban environment". Accordingly, ascertaining what constitutes the "Christchurch" tier 1 urban environment for the purposes of the NPS-UD invokes a need to consider and apply the NPS-UD definition of "urban environment". Accordingly, in the next section, we proceed to comment on how the definition of "urban environment" needs to be used to define what constitutes the "Christchurch" tier 1 urban environment.
- (d) Bay of Plenty Regional Council is identified as both a Tier 1 and Tier 2 local authority in Tables 1 and 2 respectively. This confirms that an urban environment (whether tier 1 or tier 2) is not simply demarcated by the local authority boundaries listed in the tables (e.g. the whole of the Bay of Plenty Region is not a Tier 1 urban environment, nor a Tier 2 urban environment). Rather, it implies an exercise needs to be undertaken to identify what is the tier 1 "urban environment" and/or the tier 2 "urban environment" within a local authority's boundaries, having regard to the NPS-UD definition of "urban environment".

Defining an urban environment

34. The NPS-UD definition of "urban environment" (see paragraph 13 above) will capture an area of land with the following characteristics:
- (a) It can be any area of land "*regardless of size, and irrespective of local authority or statistical boundaries*". Accordingly, an "urban environment" could include areas of land that straddle local authority or statistical boundaries. This is reinforced by:
 - (i) NPS-UD policy 10 which anticipates that territorial authorities that share jurisdiction over urban environments (e.g. because they straddle local authority boundaries) would work together when implementing the NPS-UD;
 - (ii) Tables 1 and 2 in Appendix 1 of the NPS-UD which lists, with one exception (Auckland), multiple regional and local authorities containing an urban environment.
 - (b) It is, or is intended to be:
 - (i) "*predominantly urban in character*".
 - (ii) "*part of a housing and labour market of at least 10,000 people*".
35. We agree with the Council planners that the "urban environment" definition could be described as a conjunctive, two limb test.⁸ Unfortunately, the NPS-UD provides no specific guidance regarding when an area of land could be considered as being "*predominantly urban in character*" and "*part of a housing and labour market of at least 10,000 people*". Accordingly, we provide some general guidance on what these phrases mean below.

⁸ Section 42A officers position paper for planning expert conferencing, see JWS – Day 1 at pages 21 to 22.

Predominantly urban in character?

36. As the experts at expert conferencing agreed, the term predominantly is "important".⁹ In terms of plain ordinary meaning:
- (a) "*Predominant*" means constituting the main or strongest element; prevailing.¹⁰
 - (b) "*Urban character*" means characteristic of a city or town.¹¹
37. Accordingly, to be "*predominantly urban in character*", the relevant areas of land must have as its main, strongest, or prevailing element the characteristics of a city or town. We consider that a determination of whether an area is "*predominantly urban in character*" is ultimately a matter of application of substantive judgement and expertise, having regard to particular facts and circumstances applying to that area. The exercise of such judgement could potentially be informed by input provided by a landscape architect or expert on urban character.
38. Importantly therefore, the Christchurch tier 1 urban environment, which must be an "urban environment", must necessarily exclude any areas of Waimakariri District where there is no evidence that it is, or is intended to be¹², predominantly urban in character.

Part of a housing and labour market of at least 10,000 people?

39. With regards to the phrase "*part of a housing and labour market of at least 10,000 people*", the following can be observed:
- (a) Firstly, an area of land need not, in and of itself, constitute a housing and labour market of at least 10,000 people. Rather, it is sufficient for the area of land to be "*part of*" such a market.
 - (b) Secondly, the phrase requires that the area of land be part of a "*housing and labour market*" of at least 10,000 people, not part of an *area* of at least 10,000 people.
40. Accordingly, an area of land can be "*part of a housing and labour market of at least 10,000 people*" without forming part of an "*area*" containing at least 10,000 people. As noted at paragraph 34(a) above, the definition of "urban environment" is open to an area being small and separated from a larger area that constitutes the majority of the relevant market. Thus, and by way of example, a town in the Waimakariri District could be "*part of a housing and labour market of at least 10,000 people*" in combination with another area such as Christchurch City, provided there is an evidential basis to support a conclusion that the two areas constitute "*a housing and labour market of at least 10,000 people*".
41. Ultimately, the determination of whether an area is "*part of a housing and labour market of at least 10,000 people*" requires an exercise of substantive judgement and expertise, having regard to particular facts and circumstances that apply. The exercise of such judgement could potentially be informed an economist or market expert.

⁹ JWS – Day 1 at paragraph 21.

¹⁰ *The New Shorter Oxford English Dictionary* (6th ed, Oxford University Press, 2007).

¹¹ *Ibid.*

¹² By the relevant person for the particular purpose/context – see for example paragraph 30 above.

42. The need to make a substantive judgement of what constitutes an "urban environment", including when determining whether an area is "*part of a housing and labour market of at least 10,000 people*" was recently considered by the Independent Hearings Panel (**IHP**) that considered Western Bay of Plenty District Council's (**WBOPDC**) intensification planning instrument. Similar to Waimakariri District Council, the WBOPDC is also listed in Table 1 of the Appendix to the NPS-UD as being a tier 1 local authority despite its district being mostly rural. The relevant tier 1 urban environment for WBOP is listed in column 1 of Table 1 as "Tauranga".
43. While not binding, we consider the IHP's recommendations¹³ nonetheless provides some useful guidance to assist in ascertaining what is an "urban environment".
44. In its recommendations, the IHP considered that only the townships of Ōmokoroa and Te Puke should be considered part of the Tauranga urban environment, having regard to their commuting distance to Tauranga City. More remote townships such as Katikati and Waihi Beach were not considered part of the Tauranga housing and job market, and thus excluded from the urban environment. Relevantly, the IHP stated:
- 2.3 *Both Ōmokoroa and Te Puke could, and in the opinion of the IHP should, be considered part of the Tauranga urban environment. Indeed, it is undoubtedly due to the proximity to the high-growth city of Tauranga that WBOPDC was indicated by the Ministry for the Environment to be a Tier 1 Council. Since both settlements are within commuting distance of Tauranga (Te Puke is around 25 minutes to Tauranga in clear traffic and Ōmokoroa is around 20 minutes), it is considered likely that at least a proportion of current and future residents will travel to Tauranga for work and to access goods and services.*
- ...
- 2.5 *Council anticipates that the future population of each town will be over 10,000 and for that reason they are considered "urban environments" under the RMAA 2021. However, the Act also points out that "urban environments" are areas of land, irrespective of territorial authority or statistical boundaries that are, or are intended to be, part of a housing and labour market of at least 10,000 people.*
- ...
- 3.30 *Council put forward its position that urban areas in the district were treated as being 'subject to their own housing and labour markets', and therefore only Te Puke and Ōmokoroa have or are likely to have markets of at least 10,000 people within the scope of the plan change.*
- 3.31 *The IHP takes a different view to both parties on this question. It is our view that urban areas within a commuting distance of Tauranga are effectively part of the 'urban environment' of Tauranga. Indeed, the reason for which WBOPDC was judged to be a Tier 1 Council was that it lies at the periphery of Tauranga, which is growing rapidly.*
- 3.32 *The direction of the NPS-UD and MDRS is to provide for intensification so that urban growth is provided for less through peripheral greenfield expansion and more through development within the existing urban area, ensuring the infrastructure is used efficiently and realising the benefits of 'well-functioning urban environments'.*
- 3.33 *It is noted that the townships of Katikati and Waihi Beach are a considerable distance beyond Ōmokoroa and are unlikely to attract a large number of commuters to*

¹³ <https://www.westernbay.govt.nz/repository/libraries/id:25p4fe6mo17q9stw0v5w/hierarchy/property-rates-building/district-plan/district-plan-changes/PC92%20%26%20NOR%20IHP%20Recommendation%20Reports/PC92-IHP-Recommendation-Report.pdf>

Tauranga. The IHP do not consider them to be part of the 'housing and job market' of Tauranga and for that reason, agrees that the only areas of the district that should be subject to the MDRS and NPS-UD are Te Puke and Ōmokoroa.

[our underlining for emphasis]

45. On the basis of its findings, the IHP determined that the implementation of the Amendment Act and Policy 3 of the NPS-UD was limited to Ōmokoroa and Te Puke, as they were the only settlements within the district that met the definition of "urban environment" in the NPS-UD.
46. Accordingly, we consider the Christchurch tier 1 urban environment, which must be an "urban environment", must necessarily exclude any areas of Waimakariri District where there is no evidence that it is, or is intended to be¹⁴, part of a housing and labour market of at least 10,000 people. While judgement and evidence is required (as noted at paragraph 41 above), we would observe that the closer a town is to Christchurch City, the more likely it will be part of the housing and job market of Christchurch.

Concluding comments

47. In summary, our advice above results in a conclusion that Map A of the CRPS does not define what an "urban environment" is for the purpose of the NPS-UD definition of "urban environment". While Map A can provide an indication of what local authorities intend to be "predominantly urban in character"¹⁵, there may be areas outside those identified that might also be "predominantly urban in character" on a case-by case assessment, as noted by planning experts in the JWS.¹⁶ There is no obvious indication in Map A regarding what local authorities intend to be part of a housing and labour market of at least 10,000 people.

If there is inconsistency between the NPS-UD and the Canterbury Regional Policy Statement (CRPS), for example, in terms of where or how an "urban environment" is to be identified, then how is this to be reconciled in a district plan?

48. As you know, section 74(1) of the RMA requires a territorial authority to prepare and change its district plan "*in accordance with*" (among other things) a "national policy statement" (section 74(1)(ea)). A district plan must "*give effect to*" (relevantly) both:
 - (a) "*any national policy statement*"; and
 - (b) "*any regional policy statement*".¹⁷
49. The Supreme Court decisions in *King Salmon*¹⁸ and *Port of Otago*¹⁹ identified principles as to how higher order documents should be given effect to as part of plan change processes, with the decisions being focused on the implementation of the New Zealand Coastal Policy Statement.²⁰

¹⁴ By the relevant person for the particular purpose/context – see for example paragraph 30 above.

¹⁵ As the experts agreed in the JWS Day 1 at paragraph 15(a) and 16. We have assumed that paragraph 16, which states "All experts agree with this statement", refers to the note in the bold text contained in paragraph 15(a).

¹⁶ This is consistent with the planning experts view, as recorded in the JWS Day 1 at paragraph 16(a) and 17. We have assumed that paragraph 17, which states "All experts agree with this statement", refers to the note in the bold text contained in paragraph 16(a).

¹⁷ Section 75(3)(a) and (c) of the RMA.

¹⁸ *Environmental Defence Society Inc v New Zealand King Salmon Company Ltd* [2014] NZSC 38; 1 NZLR 593.

¹⁹ *Port Otago Limited v Environmental Defence Society* [2023] NZSC 112.

²⁰ As recognised in the JWS – Day 2 at Q2, page 4.

There is High Court authority to support the application of the principles in *King Salmon* as a method for resolving tensions between provisions in all planning documents.²¹

50. The following principles, derived from case law and the RMA, are relevant for plan change processes:

- (a) The phrase "give effect to", means "implement" which is a "strong directive, creating a firm obligation of the part of those subject to it".²²
- (b) However, what is required to implement a directive, in an NPS or the CRPS, will be "affected by what it relates to, that is, what must be given effect to."²³
- (c) A requirement to give effect to a policy which is framed in a specific and unqualified way may, in a practical sense, be more prescriptive than a requirement to give effect to a policy that is worded at a high level of abstraction.²⁴ The language of policies is "significant, particularly in determining how directive they are intended to be and thus how much or how little flexibility a sub-ordinate decision-maker might have."²⁵

(d) The RMA has a settled hierarchy:

*"The hierarchy of planning documents is as follows – first there are documents which are the responsibility of central government – specifically national environmental standards, national policy statements and New Zealand coastal policy statements. Policy statements of whatever type state objectives and policies which must be given effect to in lower order planning documents. Secondly, there are those documents which are the responsibility of regional councils – namely regional policy statements and regional plans. Thirdly, there are those documents which are the responsibility of territorial authorities – specifically district plans."*²⁶

- (a) Lower order policy documents are required to "give effect to" higher order policy documents. Relevantly, the CRPS is required to "give effect to" the NPS-UD, with the RMA prescribing a process for amending regional policy statements to "give effect to" an NPS. Under section 62(3), a regional policy statement must "give effect to a national policy statement". A local authority is required by section 55 to amend a regional policy statement to give effect to a national policy statement, where such amendments are necessary.
- (b) The hierarchal nature of RMA plans mean it is generally not necessary to resort to Part 2 or higher order documents to determine appropriate plan provisions unless there is invalidity, uncertainty or incompleteness.²⁷

²¹ *Royal Forest and Bird Protection Society of New Zealand Inc v Bay of Plenty Regional Council* [2017] NZHC 3080.

²² *Environmental Defence Society Inc v New Zealand King Salmon Company Ltd* [2014] NZSC 38; 1 NZLR 593 at [77].

²³ *Ibid*, and affirmed in *Royal Forest and Bird Protection Society of New Zealand Inc v Bay of Plenty Regional Council* [2017] NZHC 3080 at [49].

²⁴ *Environmental Defence Society Inc v New Zealand King Salmon Company Ltd* [2014] NZSC 38; 1 NZLR 593 at [75]-[80].

²⁵ *Port Otago Limited v Environmental Defence Society* [2023] NZSC 112 at [61].

²⁶ *Environmental Defence Society Inc v New Zealand King Salmon Company Ltd* [2014] NZSC 38; 1 NZLR 593 at [11].

²⁷ *Ibid* at [90].

- (e) Where an apparent conflict between particular policies exists, decision-makers should first "make a thoroughgoing attempt to find a way to reconcile them".²⁸ Paying "close attention" to the wording of policies may mean an apparent conflict dissolves.²⁹

Urban environment in NPS-UD and CRPS

51. We understand your concern relates to a potential inconsistency between the NPS-UD definition of "urban environment" and the way the CRPS identifies the "urban environment". However, for the reasons given below, we consider the CRPS does not give rise to any inconsistency in terms of how an "urban environment" is to be identified for Christchurch under the NPS-UD.
52. We discussed the definition of "urban environment" in the NPS-UD at paragraphs 13 to 47 above.
53. The CRPS does not have a definition of "urban environment"³⁰ but the phrases "Greater Christchurch urban environment" and "Greater Christchurch Tier 1 urban environment" are used in Chapter 6 of the CRPS. The principal reasons and explanation for Objective 6.2.1a states:
- "The Greater Christchurch Tier 1 urban environment is the area shown on Map A."*
54. The reference to "Greater Christchurch urban environment" was introduced via changes to Chapter 6 of the CRPS in 2022 pursuant to section 55 of the RMA and clause 3.6(4) of the NPS-UD. Clause 3.6(4) of the NPS-UD only anticipates the insertion of housing bottom lines without the use of a Schedule 1 process. Accordingly, there were no changes made to Map A. Map A does not include any reference to Greater Christchurch Tier 1 urban environment, nor any other "urban environment" within the map, whether spatially, or via some annotation, or in the key. We agree with the Council's planners that there is uncertainty and ambiguity as to what line (if any) on Map A refers to an "urban environment" for Greater Christchurch, leaving room for differences of opinion.³¹
55. The starting point is whether there is an inconsistency between the urban environment, as defined by the NPS-UD, and what the CRPS says about the Greater Christchurch urban environment.
56. In our opinion, the references to "Greater Christchurch urban environment" and "Greater Christchurch Tier 1 urban environment" in the CRPS are not definitions and do not define what an "urban environment" is for the purposes of the NPS-UD. Amongst other things, there is no indication in those phrases, that they represent, relate to, account for, or otherwise have regard to, the elements of what constitutes an "urban environment" under the NPS-UD as discussed above. Amongst other things, there is no indication that Map A shows an area that is, or is intended to be "part of a housing and labour market of at least 10,000 people", nor a complete identification of an area that is, or is intended to be, "predominantly urban in character". As noted at paragraph 47 above, while Map A can provide an indication of what local authorities intend to be "predominantly urban in character", there may be areas outside those identified that might also be "predominantly

²⁸ Ibid at [131].

²⁹ *Royal Forest and Bird Protection Society of New Zealand Inc v New Zealand Transport Agency* [2024] NZSC 26 at [203].

³⁰ As the s42A officers position paper for planning conferencing identifies the CRPS does define "urban activities" and urban (see page 19-20 of JWS – Day 1).

³¹ The uncertainty is reflected in the different opinions of the experts summarised at paragraph 13(b) of the JWS – Day 1.

urban in character" on a case-by case assessment, as noted by planning experts in the JWS.³² Therefore, an inconsistency with the NPS-UD "urban environment" definition does not arise in the CRPS.

57. We also note the phrases "Greater Christchurch urban environment" and "Greater Christchurch Tier 1 urban environment" are only used in the context of Objective 6.2.1a. Accordingly, to the extent an "urban environment" is identified for the purposes of the CRPS, it would only apply for the purposes of Objective 6.2.1a. Even if there was some inconsistency between the NPS-UD "urban environment" and the CRPS "urban environment", the latter would only be relevant for the purposes of Objective 6.2.1a of the CRPS, and cannot dictate what an "urban environment" is under the NPS-UD. As discussed above, the NPS-UD uses "*urban environment*" in different contexts and in different ways.
58. If we assume there is a direct conflict between the CRPS "urban environment" and the NPS-UD "urban environment", then there would be an argument that the CRPS does not "give effect to" the NPS-UD. In that case, a decision-maker would need to enquire into and make a finding as to whether that is the case. If so, then generally speaking, the NPS-UD definition would "prevail" over the CRPS definition being the higher order document and the later in time (all other things being equal).³³

³² This is consistent with the planning experts view, as recorded in the JWS Day 1 at paragraph 16(a) and 17. We have assumed that paragraph 17, which states "All experts agree with this statement", refers to the note in the bold text contained in paragraph 16(a).

³³ See for example *King Salmon*.

Concluding comments

59. We trust the above advice is of assistance. We appreciate our advice covers a broad range of complex issues and we would be happy to address any comments, questions or concerns you may have.

Yours faithfully
Buddle Findlay

Two handwritten signatures in blue ink. The signature on the left is Cedric Carranceja, and the signature on the right is Jenna Silcock.

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Appendix E. External expert evidence

**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 12e submitters requesting Residential Medium
Density (RMD)
No. 183
No. 2990
No. 173 and 208**

And **Waimakariri District Council**

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

Date: 5th July 2024

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 and further submissions on the Proposed Waimakariri District Plan (**PDP**).
- 3 Specifically, this statement of evidence relates to the matter of Submissions relating to rezoning sought by the four submissions named in paragraph 9.
- 4 I am authorised to provide this evidence on behalf of the District Council.

QUALIFICATIONS AND EXPERIENCE

- 5 I hold the qualifications of Master of Engineering in Transportation (University of Canterbury, 2016) and BA (Hons) Planning with Transport (University of the West of England, 2007). I am a Chartered Transportation Planning Professional (CTPP).
- 6 I have worked for WSP as a Principal Transport Planner for two years, having previously been employed as a Transport Network Planner for Christchurch City Council for nine years. I have fifteen years' experience in the transport planning and engineering field, including considerable experience in preparing and assessing transport assessments, assisting formal hearing processes on multiple occasions and substantial contributions to the Christchurch District Plan Review (2015 – 18).
- 7 I am a Chartered Member of the Institute of Highways and Transportation, as a Chartered Transportation Planning Professional (CTPP). I am the vice chair of the Engineering New Zealand Transport Group national committee, a member of the national committee for

Transportation Modelling and a Board Member of the Trips Database Bureau, since 2017.

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

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

Code of conduct

9 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

10 My statement of evidence addresses the submissions in Table 1 from a transportation perspective.

Table 1: Submissions reference

Submission No.	Submitter name	Site
183	Richard and Geoff Spark	Southeast Rangiora
290	Doncaster Developments	Corner Lehmans and Parrot Road, Rangiora
173	The Moore's and Momentum Development	147 & 177 Ferry Road, Kaiapoi and 310 Beach Road, Kaiapoi
208	Suburban Estates Ltd	Northeast Kaiapoi

11 In summary:

11.1 I support in part submission #183 subject to conditions

11.2 I support #173 subject to conditions

11.3 I cannot yet support #208

11.4 I cannot yet support #290.

12 My reason for support includes:

12.1 For Southeast Rangiora (submission #183), split into three distinct blocks:

12.1.1 Block A proposed a small commercial centre (a café) with a modest trip generation outcome proposed. The proposal would be fitting of a local centre, with environmental outcomes such as short-trips, including walking and cycling. However, alternative activities could establish which would value prime access to and from the Rangiora Eastern Link Road, such as a fast-food outlet. In my opinion, further investigation is required into the potential effects of more

intensive activities than the café proposed by Ms Williams.

12.1.2 Block B proposes 290 dwellings, which I could be able to support, providing the Outline Development Plan (ODP) road network adopts suitable network management practices. I don't support more intersections on the REL Road, including a roundabout suggested in the evidence of Ms Williams. In my opinion, main access points to the REL Road should be facilitated via a roundabout on Boys Road. In my opinion further investigation is required to establish the design requirements of the proposed REL Road / Boys Road roundabout with the additional demands from Block B, and the adequacy of planning to date to accommodate.

12.1.3 Block C proposes a Light Industrial zone potentially accommodating an activity of 20,000 m². In my opinion, the trip generation potential of this activity may have been underestimated by Ms Williams, noting alternative published trip generation values which are six times greater than those applied in the submission... Therefore, I consider that more information be sought to allow for an appropriate assessment of Block C.

12.2 For 144 and 177 Ferry Road, Kaiapoi (Submission #173), I support the change of zoning to Residential Medium Density, subject to mitigation at the Williams Street / Smith Street / Beach Road intersection being specified as signals. I do not support alternative forms of mitigation suggested in the evidence of Mr Carr. I also strongly recommend requirements that public transport connections be designed

for, through suitable design of the spine road, and ensuring catchments are allowed for in the ODP, in accordance with the Operative District Plan requirements. As part of ensuring public transport connectivity, I would support further work into the Beach Road / Tuhoeh Avenue intersection to avoid public transport vehicles being caught up in delays forecast in the transportation evidence of Mr Carr.

12.3 For 310 Beach Road, Kaiapoi (Submission #173) I support the proposal on the same grounds as above (same submission), noting that Mr Carr's analysis and evidence considers all addresses listed under submission #173 together. I also support the upgrade of the Beach Road frontage, including the kerb and footpath, and request that attention be paid to providing seamless connectivity to the surrounding active travel network.

13 My reasons for not supporting at this stage:

13.1 For Suburban Estates (Submission #208), I have not seen a transport assessment and therefore have no opportunity to draw firm opinions yet.

13.2 For Lehmans Road, Rangiora (Submission #290), I cannot yet support the Medium Density Residential outcome for the location, based on the submitted ODP and lack of consideration of connectivity to Rangiora town. It relies on traffic filtering through local roads to reach key destinations in the town, and does not consider opportunity to encourage active travel into town which could partially mitigate this concern. There is no collector road connection available west of West Belt; practically this cannot be resolved due to the existing road network. There is a proposed route (the Northwest arterial) which would join up with Lehmans Road, however in my opinion this offers only partial mitigation,

given that it doesn't connect the site to the town. The supporting evidence of Mr Edwards is also acknowledged to be 'preliminary'.

INVOLVEMENT WITH THE PROPOSED PLAN

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

SCOPE OF EVIDENCE

15 My statement of evidence addresses potential transportation effects arising from submissions seeking rezoning to more intensive land use than in the Proposed District Plan (PDP). The effects relate to impacts on the receiving environment, as well as the planning outcomes of the proposal itself, such as connectivity, level of service and accessibility.

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

GENERAL ASSESSMENT – ACCESSWAYS

17 A common theme in the submissions suggests accessways are intended to be increasingly relied upon to provide access, presumably as a lower cost option than the provision of a road. In terms of high usage of laneways, I have two concerns:

17.1 Private accessways generally operate as shared areas, and tend not to enjoy amenities comparable to a road environment, such as planting which can improve the quality of the environment by providing shade, visible amenity, and other benefits associated with psychological health and wellbeing.

17.2 There is also a demonstrable hazard associated with children in conflict with vehicles on shared accessways, and specific design outcomes identified to avoid this outcome, including

avoiding the overreliance of private accessways in subdivision design¹. Other design responses would include clear segregation of outdoor living areas (play areas) from locations which accommodate vehicles.

- 18 Furthermore, accessways are not vested in Council, meaning that upkeep and maintenance will be required of the community. The Christchurch City Council Infrastructure Design Standard (IDS Part 8, Rooding), Section 8.12 recommends a balance of the 'long term maintenance costs for the residents against the benefits of providing access through a vested road².'
- 19 The Operative Plan (Chapter 30, Utilities) provides instances where accessway are managed - for example making provision for 3 – 6 dwellings to be accessed via a right of way, including the required width (Table 30.3), and specifies the outcome of common ownership (30.6.1.15).
- 20 The District Plan Review provides an opportunity to place limits around the use of laneways for access.

ASSESSMENT OUTCOMES

Southeast Rangiora (Submission #183)

- 21 The submission relates to multiple sites including:
- 21.1 17 and 19 Spark Lane
- 21.2 197 and 234 Boys Road

¹ Safekids New Zealand (2011) Safekids New Zealand position paper: Child driveway run over injuries. Auckland: Safekids New Zealand.

² For avoidance of doubt, I did not find an equivalent statement in the Waimakariri Engineering Code of Practice

22 The land parcels are referred to in Ms Williams' transport evidence as Blocks A - C, shown in Figure 1.

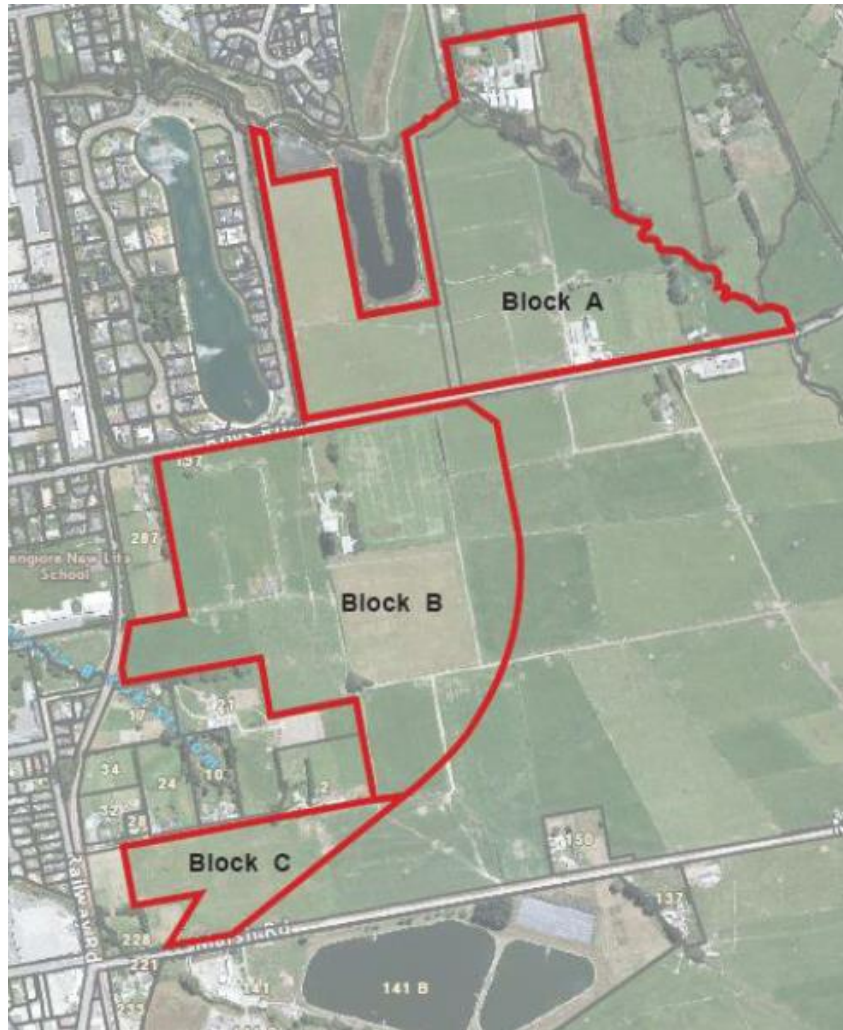


Figure 1: Location of Blocks A – C, Submission #183 (evidence of Ms Lisa Williams, Figure 1, reprinted).

23 The specific changes sought for each block are described as:

23.1 Block A: changes to the Rangiora South East Outline Development Plan (RSEODP) to reflect updated alignment of the proposed Rangiora Eastern Link Road³, however I am advised that this change is no longer proposed. Block A proposes to make provision for a 'local centre to

³ Evidence of Ms Williams, paragraph 9 (a)

accommodate a small café or similar,' with an expected gross floor area (GFA) of 650 m².

- 23.2 The evidence of Ms Williams⁴ anticipates the café would generate 33 trips per peak hour (equivalent of 5.5 trips per 100 m²). This assessment is based on an empirical source⁵. I consider this estimate to be low, for the reasons specified below, but the actual figure would likely to be within a range where potential effects would be manageable.
- 23.3 Block B: rezone from general rural to residential medium density, including approximately 290 residential dwellings and connections supporting potential future development at 287 Boys Road, (shown in Figure 1 as the block of land not included in the Block B area, to the northwest). The evidence of Ms Williams estimates trip generation outcome of 261 peak hour vehicle movements⁶, which are similar to my own calculations.
- 23.4 Block C: future rezoning for purposes of Light Industry. The evidence of Ms Williams suggests a premises of 20,000 m² GFA,⁷ and a potential trip production capacity of 100 – 200 peak hour trips.⁸

Assessment of Block A

- 24 I have considered the local centre identified by Ms Williams, and the example of a café which could establish there. However, there are

⁴ Evidence of Ms Williams, paragraph 20 (e)

⁵ RTA Guide to Traffic Generating Developments

⁶ Evidence of Ms Williams paragraph 21

⁷ Evidence of Ms Williams paragraph 24

⁸ RTA Guide to Traffic Generating Developments

other activities which may establish (depending on zoning), with potential greater effects than a café.

- 25 The node is currently proposed within the Medium Density Residential zone. I recommend that zoning, and accompanying subsequent investigation be undertaken, both in relation to the location and potential effects of more transport intensive activities which could establish.
- 26 The small commercial node could include activities of a more transport intensive nature, for example a fast-food premises. This could occur if the node was zoned as a Neighbourhood Centre, which allows for 'convenience activities.' Direct access to the REL Road could perpetuate this outcome.
- 27 Whilst Ms Williams estimates 33 trips for a cafe⁹, I have undertaken a check using the Trip Rate Information Computer System online database (TRICS), which returns a range of approximately 8-13 trips per 100 m², corresponding to 53 – 80 trips. Whilst TRICS provides a range (albeit with caveats and limitations), it does suggest that the value of 33 trips could be considered low.
- 28 In my opinion, site access to and from the REL Road should not be allowed, favouring a network management strategy instead where site and local road intersections are provided on collector roads. This frees up the purpose of the arterial road, which is to provide efficient connectivity between suburbs and towns. (The need for a well-managed network outcome is also a key theme for Block B (below) and detailed in paragraphs 36 - 44).

⁹ Evidence of Ms Williams, paragraph 20 (e)

- 29 A desirable outcome for a local centre would be one where all trips are walkable, reducing the need for car travel and allowing for the repurposing of space other than for car parking.
- 30 Within the location currently proposed, the commercial node would require:
- 30.1 Access to the REL Road, and subsequent access management which would undermine the primary purpose of the REL Road as an arterial road
 - 30.2 Connectivity with the proposed education/community area, including a crossing of the REL Road and a potential crossing of Northbrook Road.
- 31 Were Block B to be approved, a more accessible location might be closer to the centre of the combined Block A and Block B residential areas.
- 32 I recommend that the zoning of the commercial node be undertaken as part of the development of a finalised ODP. This would include investigation and assessment of potential transportation effects of a broader range of activities which could establish. A further outcome of this process should include identifying appropriate network mitigation.

Assessment of Block B

- 33 The proposal for Block B, and the resulting approximate 261 vehicle movements per hour¹⁰, represents a significant addition in network demands.

¹⁰ Evidence of Ms Williams paragraph 21

- 34 Based upon previous planning work which I have undertaken for the REL Road, the proposed trip generation potential is the equivalent of approximately 13% of the Rangiora East growth area.
- 35 In my opinion it is possible that development could be accommodated within residual transport capacity, based upon:
- 35.1 The outcomes of modelling included in Appendix 4 in the evidence of Ms Williams
 - 35.2 Modelling investigations into the REL Road, previously undertaken by WSP and summarised by Ms Williams¹¹
 - 35.3 Potential for active travel and public transport accessibility.
- 36 However, I disagree with the proposed access plan to Block B, including the design of intersections on the REL Road servicing Block B. Ms Williams notes¹² that for priority intersections onto REL Road, all movements would operate with a good level of service, except for the right turn movement (from the side road), which must give way to all other movements, which would require mitigation for safety reasons.
- 37 In my opinion the forecast delays of 10 minutes per vehicle also indicates an anticipated crash problem, based on research which connects delays at priority intersections with crash outcomes, (i.e. drivers taking risks)¹³. Without specifically relating to safety issues¹⁴, the evidence of Ms Williams refers to the outcome as 'poor performance'.

¹¹ Evidence of ss Williams, paragraphs 19 - 28

¹² Evidence of Ms Williams, paragraph 89

¹³ Tupper et.al (2011); Connecting Gap Acceptance Behaviour with Crash Experience

¹⁴ Evidence of Ms Williams paragraph 89

38 Ms Williams considers design mitigation, in the form of either restricting right turn movements, ('left in – left out' intersection design) and/or a roundabout. Neither of these configurations have been investigated further by Ms Williams. I do not support another roundabout on the REL Road.

39 In my view, the potential effects of mitigation should be considered more fully. For example, based on Ms Williams's analysis, an additional roundabout onto the REL Road would slow and delay the movements of more than 2,000 people per hour (a flow of approximately 1,700 vehicles per hour (vph)), to support turning demands serving less than 100 vph.

40 This is highlighted in Figure 2, which an extract from the Austroads Guide to Traffic Management, which guides design in New Zealand and Australia. It generally indicates against a roundabout control type between a local street and primary or secondary arterial road.

Road type	Primary arterial	Secondary arterial	Collector and local crossing road	Local street
Roundabouts				
Primary arterial	A	A	X	X
Secondary arterial	A	A	A	X
Collector & local crossing road	X	A	A	O
Local street	X	X	O	O
Traffic signals				
Primary arterial	O	O	O	X
Secondary arterial	O	O	O	X
Collector & local crossing road	O	O	X	X
Local street	X	X	X	X
Stop signs or give way signs				
Primary arterial urban/(rural)	X(X)	X(O)	A	A
Secondary arterial urban/(rural)	X(O)	X(O)	A	A
Collector & local crossing road	A	A	A	A
Local street	A	A	A	A

A = Most likely to be an appropriate treatment
 O = May be an appropriate treatment
 X = Usually an inappropriate treatment.

Figure 2: Austroads Guide to Traffic Management Part 6, Intersections, Interchanges and Crossing Management. Table 3.6

41 In my view, a better network management approach is based on hierarchies, to improve efficient operating outcomes. The use of a roundabout control would be useful to accommodate right turn

demands, and therefore provide network capacity. A collector road would be the appropriate location for a roundabout with a local road. Therefore, a roundabout would be best included on the Boys Road corridor. The efficiency of this outcome has not been tested.

42 Access to the site could still be included from the REL Road, where it results in an intersection which does not impact on the REL Road flow.

43 Boys Road requires upgrading to support Block A. The requirement must also meet the needs of Block B, and be developer-led and funded. Block B would also require inclusion within the REL Road Development Contribution area.

44 My recommended approach to network management (alternative to Ms William's) would have consequences on the design efficiency of the REL Road/Boys Road roundabout, which should be tested and understood, and necessary design identified (and potentially made a requirement), before I could support it.

Assessment of Block C

45 On Block C, I do not consider there is enough information in order to support future rezoning at this stage. The trip generation assumed in the evidence of Ms Williams is very low, and in my opinion further assessment is required based on higher figures.

46 Although detailed traffic assessment would be 'required at a later date'¹⁵, an estimate of 100 – 200 vehicles per hour is suggested, based on a range of 0.5 – 1 trips¹⁶ per 100 m². In my own assessment, referring to an alternative source widely used in the industry¹⁷, there

¹⁵ Evidence of Ms Williams, paragraph 24

¹⁶ RTA Guide to Traffic Generating Developments

¹⁷ NZTA Research Report 453 (2011): Trips and Parking related to land use

are a range of three activities which could feasibility establish in the proposed site, generating between 1 and 6.2 vehicle movements per 100 m². The potential difference of 1,000 vehicles per hour could result in effects of a more than minor degree of severity.

47 The difference in potential vehicle generation, including heavy vehicles would likely result in a different scale of environmental effects, including:

47.1 The proposed REL Road / Marsh Road intersection is a priority intersection, which may not have sufficient capacity to support safe and appropriate access.

47.2 The Marsh Road carriageway is narrow and would require upgrading.¹⁸ This would require design changes to the level crossing. I would recommend that conditions or rules should be imposed based on upgrading Marshes Road. However, aspects of the design outcomes would be ultra vires, depending on the support of KiwiRail as a key stakeholder.

48 The proposed District Plan does include a High Trip generator rule (TRAN MD-11) which includes some assessment matters which could address some of the above potential effects.

49 However, the rule would be applied only through individual resource consents. In my opinion, an Integrated Transport Assessment (ITA) of the potential activities on the site should be prepared in order that the full potential transport effects can be understood, and necessary mitigations (e.g. road widening, intersection improvements) identified.

¹⁸ Evidence of Ms Williams, p41 (para 104)

Lehmans Road, Rangiora (Submission #290)

- 50 The site is 11.6 hectares¹⁹. Mr Edwards' transportation assessment²⁰ is based on an understanding of a yield of 110 dwellings on an area of 10.5 ha²¹. I calculate this to be in the order of 9.5 dwellings per hectare²². Whilst the zoning in the proposed plan would result in approximately 23 dwellings, the estimate of 9.5 dwellings per hectare would be lower than 15 dwellings per hectare (or more) proposed through the other Medium Density Residential submissions.
- 51 For context, an outcome of 15 dwellings per hectare would result in 174 dwellings.
- 52 Mr Edwards has estimated a trip generation rate of 10.9 trips per unit per day,²³ which is the estimated number of trips for rural dwellings and slightly higher than the 8.2 vehicles per day expected of suburban households.
- 53 Accounting for the differences in expected yields (households per hectare) and trip rate (trips per dwelling per day), Mr Edwards predicts a daily generation of 1,199 trips, whereas I would suggest 1,427 trips could be a possible outcome, were a yield of 15 households per hectare to materialise, at a slightly lower trip rate of 8.2 vehicles per household.
- 54 The hierarchy of the receiving network is shown²⁴ which appears based on the Northwest Rangiora Outline Development Plan (ODP), map 155.²⁵

¹⁹ Submission #290, page 1

²⁰ Submission #290, Appendix H (p160)

²¹ Submission #290, Appendix H (p154)

²² Assuming a site of 11.6ha divided by 110 dwellings

²³ NZTA Research Report 453 (2011) Trips and Parking related to Land use

²⁴ Submission #290, Appendix H, Figure 3, (page 156)

²⁵ https://www.waimakariri.govt.nz/__data/assets/pdf_file/0012/141420/sht155-dp2005.pdf

These routes have not been included on the operative District Plan Road hierarchy.²⁶

- 55 There appears to be a gap in the collector road network towards the town, of approximately 375 m, where Belmont Avenue is identified as a local road. Belmont Avenue is also designed as a local road, including a 6.6 m wide carriageway plus a parking lane. It would not meet the requirements of a collector road under either the operative or proposed District Plan,²⁷ including a single footpath and parking lane, instead of the required two. It also includes traffic calming devices, including ‘tight’ geometry with the intersection on Oakwood Drive. Oakwood Drive includes a ‘throttle’ on approach to Belmont Avenue.
- 56 These design circumstances are characteristic of a local road, intended to deter “through traffic”. However, the design requirement of a collector road is to carry through traffic, including some heavy traffic for local access, and public transport.
- 57 There are limited opportunities within the existing network to provide for collector road requirements in order to appropriately connect the site to the surrounding town.
- 58 Forecast vehicle trip generation is estimated by Mr Edwards (Submission, Appendix H) for the receiving environment, and an estimate of daily traffic is estimated based on observation (‘existing environment’) and with the effects of the submission scenario. It concludes an outcome whereby these roads would be subjected to a small amount of traffic, and that the resulting traffic flows would be ‘imperceptible within ambient traffic volumes’.

²⁶ https://www.waimakariri.govt.nz/__data/assets/pdf_file/0011/141401/sht136-dp2005.pdf

²⁷ WDC District Plan, Section 30, Utilities and Traffic Management, Table 30.1

- 59 I cannot yet support the traffic assessment because:
- 59.1 The base counts were undertaken at a time when network demands were suppressed by the COVID pandemic.
 - 59.2 The most direct connection to Rangiora (via Belmont Avenue) is assigned just 20% of total demand, whereas I would expect this to be higher.
 - 59.3 I also note the proposed yield at less than 10 dwellings per hectare. If a higher density outcome were a reasonable consideration, then additional traffic generation would result.
- 60 The existing environment was based on traffic surveys undertaken during November 2021. In my opinion, qualified by substantial research into the effects of the COVID pandemic on the transport system, data gathered during this time period is almost certainly unreliable for purposes of establishing an existing environment.
- 61 November 2021 coincided with the rise of the Delta variant resulting in a spike of people both self-isolating and concerned to go out. In a significant survey conducted by NZTA²⁸, the September – December 2021 period saw a spike in the numbers of respondents partially or fully self-isolating (72%), and a statistically significant 50% increase in those concerned to go out for fear of either infection or transmission.
- 62 To resurvey the network during a more ‘representative’ period would likely elevate the level of the traffic environment baseline. The difference in assessment outcome might be consequential in terms of

²⁸ Waka Kotahi Covid 19 transport impact (March 2022), Fieldwork waves 1-27 core report

quantifying the environmental impacts of routing development traffic through the adjoining local road network.

- 63 The 'environmental capacity' is a research-based consideration²⁹ developed in Christchurch, with an estimated threshold of between 1,500 – 2,000 vehicle per day. Beyond this threshold, the research describes that the amount of traffic results in changes in how residents perceive their street, which further results in outcomes such as 'retreating' from the street front (e.g. constructing high boundary fences, locating the living room in the rear of the house), or perceiving safety effects as a pedestrian.
- 64 Environmental capacity is not an exact science. I have successfully applied it in the past, in a situation where the amount of additional traffic proposed was well above the threshold range.
- 65 In this case, if the difference in the baseline flows for Belmont Avenue were increased by 20% (to compensate for the 'COVID effect' on the traffic counts), the resulting situation with development would increase from 1,332 to 1,532 vpd, or into the 1,500 – 2,000 range of environmental capacity noted above.
- 66 I have included the traffic generation estimate from the Submission document, see Figure 3:

²⁹ Chesterman and Koorey, 2010, "Assessing the environmental capacity of local residential streets"

Figure 3: Submission #290, Appendix H (Mr Ray Edwards), Table 3, with Belmont Avenue highlighted

Network Link	Existing Volume	Future Volume
Lehmans Road	1610	2090
Huntington Drive	1500	1680
Charles Upham Drive	1500	1680
Sandown Boulevard	500	1220
Belmont Avenue	1092	1332
West Belt (north of High St)	6449	6749
West Belt (north of Seddon)	3327	3627
Oxford Road (west of Lehmans)	5823	5943
Oxford Road (east of Lehmans)	6519	6579
High Street (east of West Belt)	6892	6952

- 67 The Appendix H traffic assessment includes assumptions of route choice in the surrounding network, which support the overall effects based conclusions. Appendix H does underline its status as ‘preliminary’ advice.
- 68 Usually, route choice and network effects associated with larger housing developments are tested in transport models, which can predict the traffic patterns and delays associated with proposed development. The models work by predicting the quickest path between the development site and key destinations.
- 69 In this case, a logic-based estimate is presented by Mr Edwards, including an assumption that 60% of trips are made to/from the ‘south or southeast’. The definitions of the compass point zones are not clarified, and I assume that south-east includes the town centre and most schools, and the south includes connections to Christchurch City. The remaining 40% cover the north, west and east.
- 70 The method behind assigning weightings is not set out. Weightings should be based on the locations of key destinations, or using census data (or using a mathematical algorithm which takes these into account, plus also accounting for the probable journey length).

71 The route towards the town centre and most schools may be both actually and perceived to be more direct via Belmont Avenue, which would result in more traffic using it than suggested in Figure 3.

72 Based on the above factors, including adjusting the baseline to account for the ‘COVID factor,’ I have developed Figure 4 to demonstrate alternative possible traffic demands on Belmont Avenue. As a reminder, the theoretical environmental capacity of a local road is between 1,500 and 2,000 vehicles per hour (vph) and it can be seen that the predictions are within the range of this threshold. This means that the effects of the rezoning could potentially noticeably change amenity within the surrounding road network.

Figure 4: Alternative possible outcomes on Belmont Avenue

% traffic to Belmont Ave	Dwelling Yield	Development traffic (vpd)	Total traffic (vpd)
			1,310
20%	10 / hectare	240	1,550
20%	15 / hectare	285	1,595
40%	10 / hectare	480	1,790
40%	15 / hectare	571	1,881

73 The design of the ODP concept does limit site access to the local road network, via the Sandown Bvd, showing other eastbound connections as ‘green links’. Parrott Road is shown as providing access to Lehmans Road at the southernmost extent of the site.

74 Lehmans Road is proposed by WDC to be developed as a freight route, with some improvements included in the Long Term Plan (LTP) such as the Lehmans Road / Johns Road roundabout included for 2031³⁰. This route would also include the ‘northwest arterial,’ shown on the ODP as the Parrot Road. As an arterial road, it might provide a freight bypass around Westbelt. The mix of an arterial road with medium density

³⁰ LTP finalised on 25th June 2024

housing would not be ideal, and if approved, I would recommend a suitable access management response be reflected within a revised ODP, which could include restricting access

75 The route is also identified in the Waimakariri walking and cycling plan as providing a route for low confidence / family riders. This facility would take the form of a dedicated path, following the line of the northeast primary road shown on the concept ODP. However, it is not indicated on the ODP.

76 In my opinion, the inclusion of the northeast arterial would not fully mitigate the lack of Collector road access serving the site from the east.

77 I also note that, within the current 80 km/h zone, the distance between the two proposed primary road intersections onto Lehmans Road, at approximately 400 m, would not meet the requirements of the operative District Plan³¹ of 550 m. Under the proposed District Plan, the requirements would increase to 800 m.

78 A mitigation could be to reduce the speed limit, however this would be both an ultra vires requirement (requiring gazetting by NZTA) and would need to be considered in the context of possible friction with other intended functions of Lehmans Road, including the movement of freight.

79 I also note the issues of active travel connectivity between the site and the town. The closest school, Ashgrove School, would be 2 km away, limiting walking and cycling opportunities.

80 For reasons set out in paragraphs 17 to 20, roads provide comparably better service, whereas long shared driveways rely on private maintenance and are associated with toddler deaths.

³¹ WDC District Plan, Section 30, Utilities and Traffic Management, Table 30.7

81 Overall, I consider the submission requires amendments to support the Residential Medium Density zoning it seeks, including:

81.1 Consideration of active travel connectivity between the site and the town centre/schools and opportunities to provide this;

81.2 Review of the internal ODP layout to encourage a connected road network, rather than encouraging shared driveways/accessways;

81.3 Including the walking/cycling path on the ODP along Lehmans Road and the northwest arterial;

81.4 Measures to prohibit driveways onto Lehmans Road / the northwest arterial.

82 There are existing constraints in the Rangiora road network which are difficult to address as the town is already established. I note my high level of assessment of Belmont Avenue suggests it has capacity for increased traffic. However, I consider there are some network improvements and updates to the ODP which could assist the connectivity of the site to the main activity centres in town.

83 I also note that the transport advice of Mr Edwards accompanying the submission is defined as 'preliminary,' suggesting scope for changes and updates, which could include addressing the matters in paragraph 81.

144 & 177 Ferry Road, Kaiapoi (Submission #173)

84 The combined site area of 144 and 147 Ferry Road is 28.5 ha. The evidence of Mr Carr³² considers that between 600 and 900 dwellings

³² Evidence of Mr Carr, paragraph 17

could result. Based on my calculation, this would equate to 21 - 32 dwellings per hectare.

85 I have not found a definitive trip generation value in Mr Carr's evidence. I would normally expect the vehicle generation to be in the order of between 4,725 and 7,200 vehicle movements per day (corresponding to the above possible development yields) based on 8 trips per household.³³ The peak hour demands could range between 450 – 750 vehicle movements. I note Mr Carr's comments that the outcome would 'vary for a variety of reasons³⁴,' which I agree with.

Assessment of ODP concept

86 Mr Carr's assessment includes identifying some roading upgrades, as well as specifying the suitability to accommodate a bus service "if appropriate"³⁵. In my opinion, it is appropriate to provide for a bus service through the site, given the scale of the proposal. Designing to accommodate choice of travel options is an outcome sought by the Proposed District Plan.

87 I understand that Environment Canterbury (ECan) has historically indicated interest in providing a public transport service in east Kaiapoi. There is also an ongoing programme to increase frequencies of public transport (the 'PT Futures' programme), which includes increasing frequencies to Kaiapoi. Mr Carr notes the existing service frequencies of 30 minutes (Rangiora – Cashmere) and 60 minutes (Pegasus – City).³⁶

88 The benefits of rerouting public transport via the subdivision would include increased patronage, relative to the existing Williams Street

³³ Based on NZTA Research Report 453: Trips and Parking related to land use.

³⁴ Evidence of Mr Carr, Appendix A, paragraph 6.1.1

³⁵ Evidence of Mr Carr, Appendix A, paragraph 7.2.7

³⁶ Evidence of Mr Carr, Appendix A, paragraph 4.2.2

route, which is abutted on one entire length by a golf course. If rerouted, the route catchment could potentially increase by up to approximately 1,000 dwellings.³⁷

89 I cannot identify an alternative viable public transport route available in the existing Suburban Estates subdivision.

90 Including public transport in the ODP would also require roading design considerations, as noted by Mr Carr (ibid). It also requires an ODP outcome reflective of ensuring walkable catchments. This is demonstrated in the Operative Plan, requiring 'not less than 90% of dwellings....within 500 m of a proposed bus route.' (Engineering Code of Practice Part 8, Roding, s8.15.1), partially demonstrated in Figure 5:

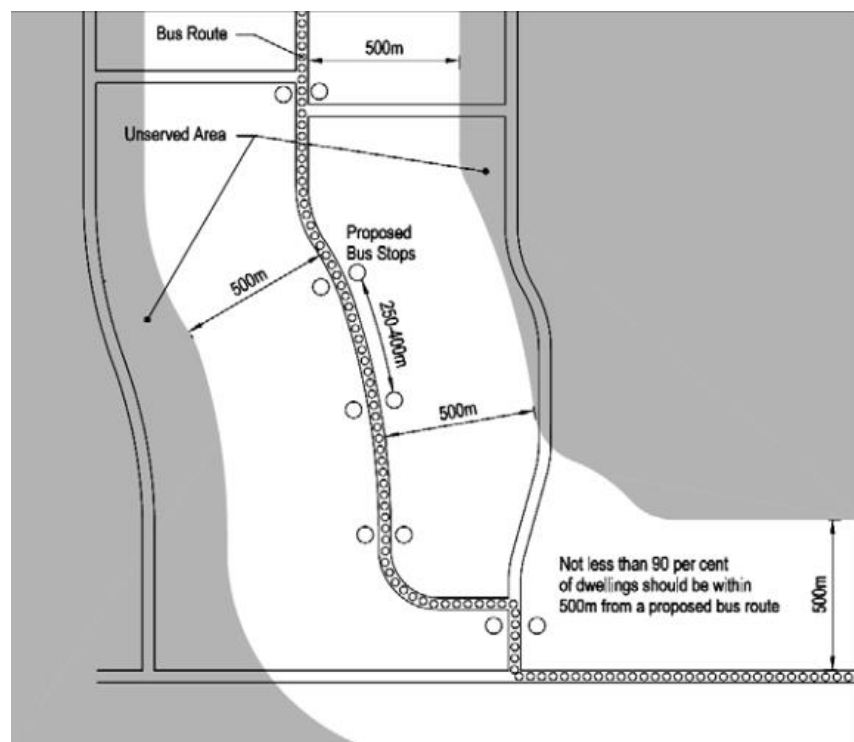


Figure 5: Engineering Code of Practice Part 8, Roding, s8.15.1, Figure 8.3

³⁷ Including the proposed subdivisions and approximate number of dwellings currently not included within the

91 The proposed ODP concept, shown in Figure 6, appears to reflect a connected network layout, which is likely to support a walkable public transport catchment.



Figure 6: "Illustrative Masterplan", extract from Evidence of Mr Carr, Appendix A, Figure 9

92 The layout shown in the proposed ODP does include some undesirable outcomes, which would require investigation, including:

92.1 Some obtuse intersection alignments

92.2 Commonality of four-way priority intersections, which are less safe than 'staggered T' alternatives. Four arm intersections. Four-way intersections include 24 possible vehicle trajectory conflict points, whereas 'staggered T' intersections include 18.

92.3 Possible design geometry constraints of the roundabout.

93 These details could be resolved through a formal ODP development process, subject to conditions requiring the inclusion of public transport.

Assessment of proposed network mitigation measures

- 94 I do not agree with all of the network mitigation options proposed by Mr Carr.
- 95 Mr Carr's evidence shows count data (turning movements observed in 'February 2024' and 'March 2023') in Figure 3 and 4 of Appendix A. The specific dates and circumstances of collection are not specified, but I trust the count data has been sourced appropriately.
- 96 The count data does not take into account some of the uncompleted developments in the area, henceforth not representing the consented environment. Mr Carr states the incomplete development as 308 residences and further the equivalent vehicle generation outcomes by applying additional traffic including a rate of 1 peak hour vehicle trip per dwelling, a rate based on 'previous assessments'³⁸.
- 97 No combined future turn count data (i.e. estimated 'receiving environment' plus estimates of traffic generation associated with this submission) is included.
- 98 Intersection capacity analyses for the receiving environment estimates (morning and evening peak hour operations) are included and predict good to excellent levels of service.³⁹
- 99 Mr Carr estimates the additional trip generation associated with the submission, adding the traffic to his estimated receiving environment, and performs intersection capacity analysis to estimate the effects of development on all intersections servicing the development, and the Smith Street / Williams Street / Beach Road roundabout.

³⁸ Evidence of Mr Carr, Appendix A, paragraph 4.1.3 – 4.1.6

³⁹ Evidence of Mr Carr, Appendix A, Table 1 and Table 2.

100 Mr Carr undertakes intersection capacity analysis, based on the ranges of demands which may result, depending on development outcome (as summarised above in paragraphs 84 - 85).

101 Most of the assessment pertains to the Smith Street / Williams Street / Beach Road roundabout, which is found to have insufficient capacity to support the development.

Assessment of Smith Street / Williams Street / Beach Road roundabout

102 Mr Carr clearly sets out in Appendix A Table 4 that he predicts that during the morning peak hour, the Beach Road approach loaded with development traffic would experience significant delays and queuing. He does not specify the exact values, only that the delays per vehicle would exceed 4 minutes 10 seconds, and the 95th percentile⁴⁰ queue would exceed 100 m long.

103 The morning peak is the worst expected period, given that most traffic would rely on the same intersection to exit the area. During the evening peak, most development traffic is returning, dispersed across more of the approaches, and raising delays, but not to the same extent.

104 I offer a simplified table (Table 2) showing Mr Carr's forecast outcomes for the Smith Street / Williams Street / Beach Road roundabout, by scenario and showing the category levels of service relating to delays ("A" being excellent, "F" being "failed").

⁴⁰ That is, there would be a 5% probability of the maximum queue length exceeding this. The 95th percentile is the industry accepted queue length for design purposes.

Table 2: Summary table of Mr Carr's modelling outcomes of Smith Street / Williams Street / Beach Road roundabout

Scenario	Level of Service, Time Period	
	Morning Peak	Evening Peak
Receiving environment	A	B
Plus development traffic (low estimate)	F	C
Plus development traffic (high estimate)	F	F

- 105 Mr Carr proposes and models mitigation for each trip generation estimate outcome, including:
- 105.1 Low development outcome – a second, short Beach Road approach lane
 - 105.2 High development outcome – transformation from roundabout to traffic signals.
- 106 For the low development outcome, I would question the effectiveness of this proposal. I have not seen the detailed analysis behind it.
- 107 The concept second lane is reprinted below in Figure 7 for convenience:



Figure 7: Evidence of Mr Carr, Appendix A, Figure 16: concept second lane to accommodate 'low' development scenario traffic

- 108 Space for the second lane is created by removing kerb build outs which contribute to the safe roundabout design geometry as well as reducing pedestrian crossing widths. This is a crossing which would conceivably be used by residents of a retirement village at 310 Beach Road, were the submission successful. (Please note that although I separate out the assessment of 310 Beach Road (submission #173), Mr Carr does cover this in conjunction with submission #144 and #177 in his evidence).
- 109 Mr Carr's modelling predicts a transformative outcome, from ">250 seconds" to 37 seconds delay for the east approach, based on providing an additional short approach lane. However, models are tools used by transport engineers and sometimes require interrogation.
- 110 I question the effectiveness of a short lane intended on serving left turn movements only – or approximately 25%⁴¹ of the total flow 'arriving' at the roundabout. An average queue of four vehicles would include a single left turn demand, and if placed towards the end, would be unable to reach the short lane.

⁴¹ Calculated from Mr Carr's turning count estimates

111 This is further evidenced in modelling for the ‘maximum’ traffic scenario, which includes the short second lane scenario. This is shown in Mr Carr’s evidence, Appendix A, Table 8, reprinted below in Table 3. For the Beach Road approach through and right turn movements, the forecast delay is “>250 seconds”. For the left turn movement, it is 15 seconds.

Table 3: Extract from Evidence of Mr Carr, Appendix A, Table 8

Road and Movement		Morning Peak Hour			Evening Peak Hour		
		Avg Delay (secs)	95 %ile Queue (veh)	Level of Service	Avg Delay (secs)	95 %ile Queue (veh)	Level of Service
Williams Street (south)	L	35	11	D	71	47	F
	T	35	11	D	71	47	F
	R	38	11	D	74	47	F
Beach Road	L	15	3	B	9	1	A
	T	>250	>100	F	7	2	A
	R	>250	>100	F	11	2	B
Williams Street (north)	L	15	13	B	47	23	D
	T	15	13	B	46	23	D
	R	18	13	B	50	23	D
Smith Street	L	8	2	A	>150	65	F
	T	8	2	A	>150	65	F
	R	11	2	B	>150	65	F

Table 8: Peak Hour Levels of Service at the Williams Street / Beach Road / Smith Street Roundabout (Maximum Practical Yield, Short Second Lane on Beach Road Approach)

112 The difference between Beach Road turning movements delays per movement seems unlikely, considering that all left turn traffic is required to negotiate a queue predicted to be 100 m long prior to arriving at the intersection.

113 The modelling outcomes for the high development scenario (defined in paragraph 84) shown above indicates capacity issues on two of the approaches, although not at the same time.

114 Mr Carr identifies traffic signals as a means of providing extra capacity, providing an example of the Glandovey Road / Idris Road intersection in Christchurch, which was upgraded from roundabout to traffic signals in 2016.

115 In my view, signal control would be the most appropriate solution, given that it can provide additional capacity in a compact format. The

alternative would be a larger roundabout, which would require the purchase and demolition of four properties to achieve. The signals option, if mimicking the outcome at the Glandovey Road / Idris Road intersection would not require land purchase.

- 116 At this stage, a detailed feasibility assessment of intersection design layout has not been undertaken, which could identify key effects (e.g. on surrounding properties) or site characteristics which could impact upon cost. However, I agree that it is an appropriate means to accommodate development.
- 117 Mr Carr offers two distinct development scenarios of 600 and 900 dwellings, respectively, and a form of mitigation for each. The outcome may lie between these two thresholds. Conditions specifying developer-sponsored upgrades are usually specified by the number of dwellings.
- 118 In my opinion, the threshold for signal controls is lower than 900 dwellings, noting that:
- 118.1 I disagree with the likely effectiveness of the proposed mitigation for the 'low' development scenario (600 dwellings).
- 118.2 The level of service 'F' ('Fail') category is already passed under the 'Minimum' scenario, for one approach.
- 118.3 The medium development scenario Level of Service (LOS) F applies to delays of 80 seconds or more. The average delay per vehicle specified by Mr Carr for both the medium and high development scenarios is ">250 seconds,' equivalent of four minutes.
- 118.4 I have conducted an analysis shown below which suggests the operational 'tipping point' at which signals would be

required would occur more closely to the minimum than the maximum development scenario.

119 I have analysed Mr Carr's evidence and data to develop Figure 8. It shows the relationship between modelled demand (vehicles per hour) and delay, and the pattern between the outcomes of the receiving environment, the minimum and maximum development scenarios. Although this samples the outcome for a single movement at the intersection, the pattern would be the same for any other movement. It is typical in traffic engineering that each additional vehicle added will increase the overall delay at an escalating rate.

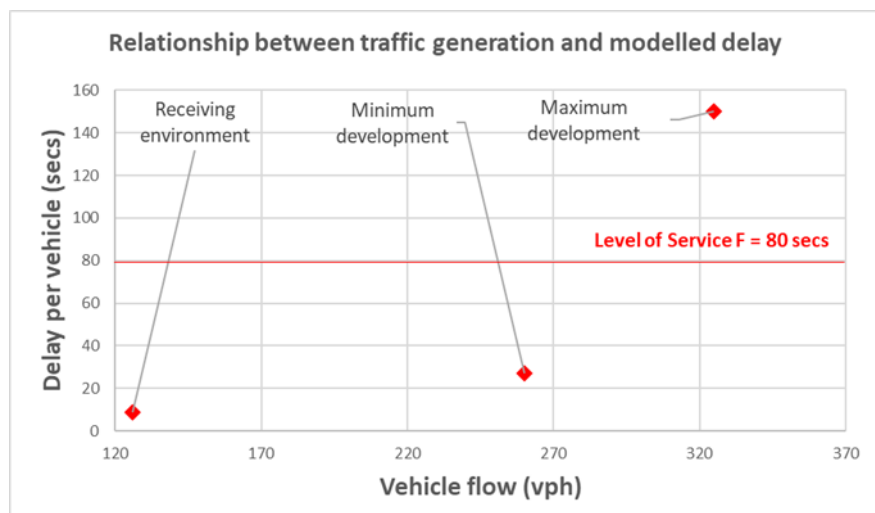


Figure 8: Relationship between traffic generation and delays, derived from Mr Carr's evidence and models

120 Figure 8 is developed as a reference, rather than a tool on which to base a detailed position. I note that the true value of the highest delay is not known, as it is reported by Mr Carr as ">150" seconds. For convenience, I shall treat it as 150 seconds.

121 Figure 9 shows an application of the relationship shown in Figure 8, to intercept the point in flow at which LOS F would be reached. It is an aid to demonstrate that, in addition to the Beach Road approach which is shown to have 'failed' at the minimum development outcome, the

Smith Street and Williams Street approaches would like 'fail' prior to the 'maximum development' outcome.

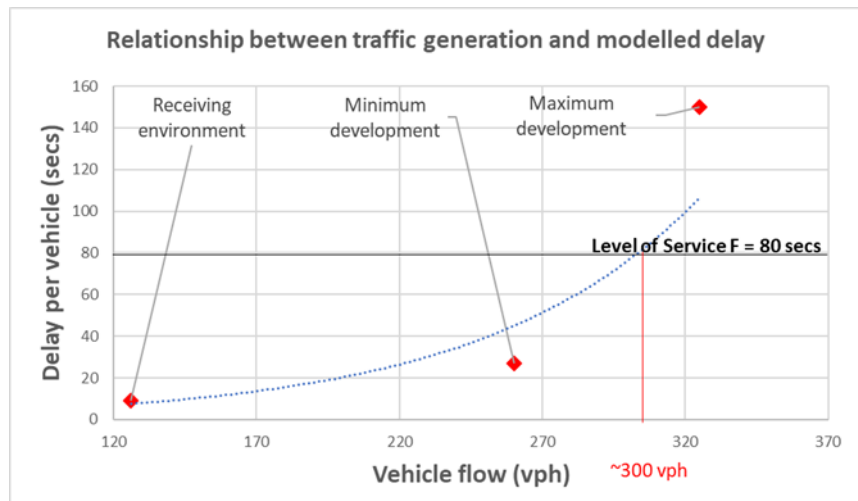


Figure 9: Intercepting the point at which Level of Service F would be triggered.

122 Figure 9 is oversimplified, but does highlight the classic exponential relationship between demand and delay. It shows interception of the exponential trend (which notably isn't a perfect fit) at around 300 vehicles per hour. If the relationship between vehicle generation and development is approximately linear, then 300 vph represents about 60% of the maximum traffic outcome. This could be interpreted to mean that LOS F would be reached under a development scenario of approximately 780 dwellings.

123 I also note that Level of Service F is a 'worst case' target. Delays of 1 minute would be reached at around 715 dwellings, following the same approach shown in Figure 9.

124 I question the use of 'present day' design flows on which to base network design decisions. Detailed design outcomes should be able to accommodate growth. For context, if the demands at the intersection were to grow 2% per year, the 300 vehicles per hour shown in Figure 9 would be reached by year 8.

- 125 In my opinion, an appropriate requirement for the Smith Street / Williams Street / Beach Road roundabout is to require an upgrade to signals, because:
- 125.1 There is indication of level of service failure at the minimum development scenario, and I have included above my reasons for why a mitigation options of a short second lane would not be effective.
 - 125.2 I am of the opinion that the trigger for the intersection reaching Level of Service F (a universally accepted 'fail' point) would like occur well within the maximum development scenario.
 - 125.3 The actual development outcome would likely be within the identified minimum and maximum ranges. Based on this assumption, my own and Mr Carr's analysis, I conclude that signals would probably be an eventual requirement.
 - 125.4 The impact on the existing community, without signals, would represent a more than minor effect.
- 126 I agree with Mr Carr's identification of a signals scheme, and suggest it is a requirement of the rezoning if the rezoning request is granted. I recommend the requirement identify that the scheme be designed in full and implemented at full cost to the developer, to the satisfaction of the road controlling authority.
- 127 Mr Carr specifies a subsequent planning stage where Restricted Discretionary assessment could be used to assess network mitigation.

He acknowledges that 'if no improvement scheme is possible, consents can be declined.'⁴²

128 In my opinion, a rule attached to the re-zoning should be included which requires signals at the Smith Street / Williams Street / Beach Road roundabout, because a signalised intersection represents a significant change to the local environment, and should be indicated as early as possible.

Assessment of Beach Road / Tuhoe Drive

129 Mr Carr's evidence indicates that for the 'full' development scenario, the right turn side movement from Tuhoe Avenue would experience high demands and a poor level of service during the morning peak.

130 A poor level of service outcome can result in poor safety outcomes, as high delays are associated with driver risk taking.⁴³

131 The outcome caused by a combined 594 vehicles attempting to turn right from the subdivision, giving way to 425 vehicles. By applying first principles methods, it is possible to calculate that the rate of arrival for the right turners is one vehicle per 6 seconds, whereas the 'processing' rate would be 19 seconds. This results in snowballing of delays.

132 This outcome is a different context to the Smith Street / Williams Street / Beach Road roundabout, noting that:

132.1 It is a matter which affects one movement, at one time of the day, not multiple movements across different times of the day.

⁴² Evidence of Mr Carr, Appendix A, paragraph 7.1.19

⁴³ Tupper et.al (2011); Connecting Gap Acceptance Behaviour with Crash Experience

- 132.2 The network context is different: it is a side road from the subdivision. A much smaller portion of the community would be affected. However, there is a desire to include public transport. The outcome would undermine public transport journey time reliability in the mornings.
- 132.3 There are other opportunities to address this issue, including the enhancement of active travel and public transport measures.
- 132.4 Mr Carr notes⁴⁴ that a reduction of 53 households could result in an improved Level of Service outcome.
- 133 During the morning peak, the flow rate out of the subdivision would be greater than the flow rate opposing it. This would suggest two options, based on the design flows:
- 133.1 Reversing the intersection priority
- 133.2 A small roundabout.
- 134 Either option would result in increased delays on Beach Road, including traffic from Pines Beach. Furthermore, a good level of service is forecast for all other periods of the day.
- 135 Either option would also support public transport services.
- 136 I recommend that this be considered further in an Integrated Transport Assessment, and that the scope of this work should be focussed in part through the requirement to provide for a public transport service through the subdivision.

⁴⁴ Evidence of Mr Carr, Appendix A, paragraph 7.1.15

310 Beach Road, Kaiapoi (Submission #173)

- 137 This site has been considered by Mr Carr in conjunction with 144 and 177 Ferry Road (Submission #173). My conclusion drawn for the upgrades to the Smith Street / Williams Street / Beach Road roundabout also relate to this submission.
- 138 The traffic generation for the combined two submissions has not been separated out by Mr Carr.
- 139 Mr Carr again considers a range of development outcomes, being 100 and 145 residences for the minimum and maximum ranges, respectively. For peak hour movements, he applies 1 vehicle movement per dwelling.
- 140 The site is self-contained, with no other network connection options other than to and from Beach Road. There is a paper road running on the eastern boundary and provision indicated for future connectivity from the site, should it be formed.⁴⁵
- 141 The main intersection serving the site would appear to form a four-arm intersection with Meadow Street. Four arm intersections are undesirable outcomes owing to the relatively high number of vehicle conflict points and therefore poor safety outcomes (see paragraph 92).
- 142 Beach Road on the site frontage includes an open drain, and no footpath. There is a proposal to include kerb and footpath on the Beach Road frontage. I recommend that this should be a requirement of the final ODP. I further recommend that attention should be paid to the connections into the existing active travel infrastructure, so that it is part of a seamless network.

Suburban Estates (Submission #208)

143 I have not seen a Transport Assessment in relation to this submission.

144 The ODP area is shown within the red polygon in Figure 10. It covers an area of approximately 30 ha, which is a similar area of that covered by Submission #173.

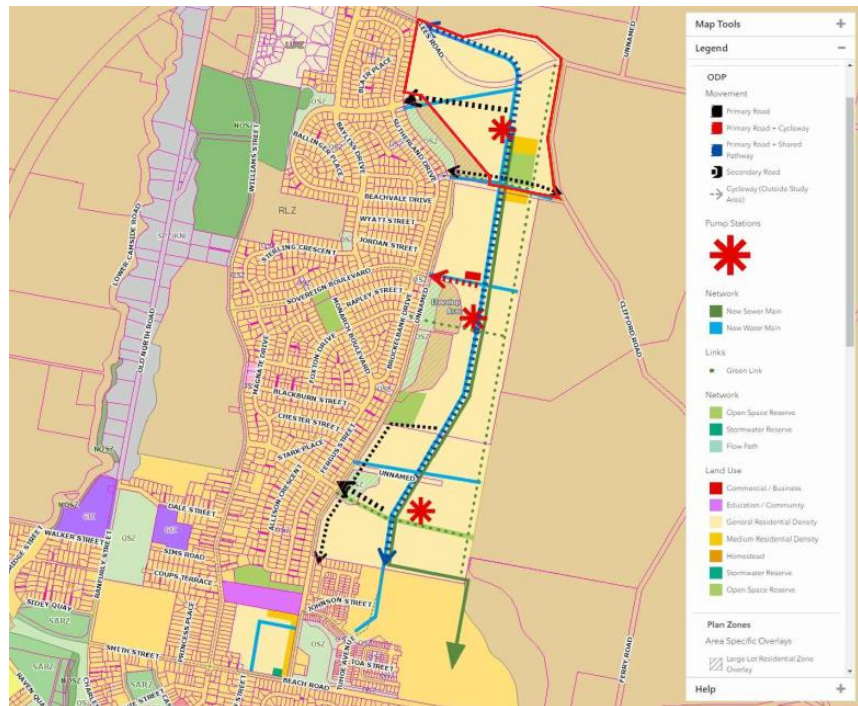


Figure 10: Concept ODP, Submission statement, Appendix 3

145 For context, the mitigations recommended for submission #173 include the transformation of the Smith Street / Williams Street / Beach Road intersection from roundabout to signals.

146 The ranges of development assumed by Mr Carr for submission #173 represented in excess of 20 dwellings per hectare. If developed at the same rate, the area could yield more than 600 dwellings.

- 147 I calculate the trip generation rate of 600 dwellings to be approximately 4,800 vehicle trips per day⁴⁶, or a peak hour generation rate of 450 – 540 vehicle movements per hour.
- 148 The proposed area is located within the wider ODP (shown in Figure 10, above), which includes a total of 100 ha and a potential cumulative vehicle generation of 16,000 vehicle trips per day.
- 149 In my opinion, the potential for public transport services to mitigate cumulative transportation effects cannot be overstated. Approximately half of commuted trips from Kaiapoi are destined for Christchurch city. There is potential to run Bus Route 1 (Kaiapoi – Cashmere) through the spine road of the ODP. Given that approximately 25% of all trips are commuting, public transport connections to Christchurch could serve 2,000 trips per day (resulting from the entire Figure 10 ODP area) which would otherwise have been driven by car.
- 150 The development can also accommodate a local commercial centre, well connected by active travel opportunities.
- 151 The submission does not include an assessment of potential transportation effects. Further information should be provided
- 151.1 Commitment to network design which allows for a quality Public Transport service, with 90% of dwellings located within public transport catchments.
 - 151.2 Active travel network connectivity to Kaiapoi town centre.
 - 151.3 The capacity of intersections on the existing network. For context, the Williams Street / Beach Road signals concept proposed by Mr Carr to mitigate the submission #173 traffic

⁴⁶ NZTA Research Report 453 (2011) Trips and Parking rates for Land use

was developed within the road corridor. This design may not provide sufficient capacity to accommodate the additional development.

151.4 Network upgrades, including Lees Road.

152 Mr Carr suggested that submission #173 would add up to approximately 839 vehicles per hour (vph) to the Williams Street / Beach Road intersection, requiring its upgrade. Cumulative effects resulting from submission 208 have the potential to further increase the design requirements of the upgrade. In my opinion, this could potentially trigger requirement for a larger intersection, including land acquisition.

153 I cannot form an opinion as no transport assessment has been provided. Given the large development area proposed, I recommend that a combined land use / transport infrastructure plan, aimed at minimising vehicle generation is developed, after which the appropriateness of the development could be assessed from a transport perspective.

CONCLUSION

154 For each submission, I have identified specific effects to be avoided or mitigated. I therefore recommended:

Southeast Rangiora (Submission #183)

Block A

155 In my opinion the residual issue is the nature and type of activities which could eventuate in the 'small commercial node,' and that the potential transportation effects should be tested.

156 Ms Williams describes a café generating 33 trips per hour, which might be considered low in term of both estimates from alternative empirical sources, and the large gross floor area of 650 m².

157 In my opinion, an activity of 33 trips per hour could be easily accommodated, as a local centre. However, the zone which could include this centre may also make provision for more transport intensive activities than the café example offered by Ms Williams.

158 The proposed commercial node location is within proximity to the REL Road, presumably implying direct access to the REL Road. I have set out the network management principles (including extracts from Austroads) in the above assessment of Block B, qualifying my opinion as to why direct access to the REL Road should be limited (paragraphs 38 - 42).

159 A local centre would predominantly serve the surrounding residential area, and would attract trips within easy walking and cycling distance. A well planned local centre could support outcomes of a walkable community, which is also associated with public health and quality of place.

160 I therefore conclude that the small commercial centre would likely be accommodated within the network, without effects, provided it is located and designed to serve local needs. This outcome would avoid the necessity for direct access from the REL Road.

Block B

161 I have not identified Block B in growth strategies to date. Henceforth my support for Block B would be based on an ODP which supports the existing objectives, including the functionality of the REL Road as an Arterial Road.

162 In practice, this means avoiding further intersections or points of delay for REL Road traffic. Ms Williams has suggested an additional roundabout could be included to facilitate some turning movements which would otherwise operate with a poor level of service. I do not support another roundabout on the REL Road.

163 A roundabout would slow around 1,700 vehicles per hour, for the benefits of facilitating around 100 turning movements. The Austroads design guidelines does not recommend a roundabout at an arterial / local road intersection, partly to avoid a disproportionate impact on the arterial road network.

164 I would prefer an outcome which facilitates access onto Boys Road, which could include another roundabout. In my opinion, this constitutes an appropriate network management response.

165 Consequently, the REL Road designation and/or concept design should be checked for adequacy of sufficient design geometry to accommodate this additional demand, including at:

165.1 The roundabout at REL Road / Boys Road

165.2 The roundabout at Lineside Drive / REL Road.

166 I could support Block B upon determination of sufficient network design capacity.

Block C

167 In my opinion the assumed trip generation which has supported assessment is unrealistically low, given that published values include generate rates in order of magnitude 6 times greater than those applied.

168 I recommend requiring an assessment of effects which reflects higher trip generation outcomes.

Lehmans Road, Rangiora (Submission #290)

169 In my assessment, I consider that the site is disconnected from the town, served by residential streets which are intentionally designed to deter through traffic, including Belmont Avenue. These roads are clearly intended to service residential access, and are not designed to fulfil the role of collector roads.

170 Local roads have an 'environmental capacity', beyond which the ambient traffic levels are believed to cause deterioration of interactions between the households and the street. This manifests itself in 'retreat' from the street, including the development of high fences and a decline in neighbourly interactions. The approximate range at which this occurs is considered to be 1,500 – 2,000 vehicles per day⁴⁷.

171 In my opinion, the proposal could increase traffic levels on Belmont Avenue from under this threshold to well within it.

172 Although the submission indicates that the development impacts would not meet this threshold, I consider the supporting assessment uncertain because:

172.1 The counts used to establish the baseline were undertaken in November 2021, as the Delta Covid variant was causing people to remain at home out of caution, and henceforth skewing traffic surveys downwards

⁴⁷ Chesterman and Koorey, 2010, "Assessing the environmental capacity of local residential streets"

- 172.2 The assumptions for future traffic patterns associated with the development are not clear, and assign a modest proportion to Belmont Avenue, noting its role as the most direct road connection to the town, town centre and schools,
- 172.3 The Medium Density Residential zone can make provision for higher development yields than the hypothetical 9.6 households per hectare offered in support of the submission (roughly the equivalent of quarter acre sections).
- 173 Accounting for either one of the above three factors has potential to increase Belmont Avenue traffic levels noticeably, and possibly to the longer term detriment of residential amenity.
- 174 In my opinion, the combination of all three parameters could take effect: that is, increasing the baseline to account for the 'Covid effects', the outcome of a higher share of traffic wanting to use Belmont Avenue, and a higher development density.
- 175 Furthermore, the site is remote, being 2 km from the nearest school, and borders a route that is being developed to potentially carry freight.
- 176 The development of the Northeast arterial would not provide direct access towards the town, and would not therefore fully mitigate the lack of accessibility stated above. The cycle way identified in the Waimakariri walking and cycling plan (following the alignment of the Northeast arterial) has not been identified.
- 177 If the proposal were approved, I would recommend access management, to avoid direct access to Lehmans Road and the northwest arterial. I would also recommend more provision for access, including development of active travel networks.

144 & 177 Ferry Road, Kaiapoi (Submission #173) and 310 Beach Road, Kaiapoi (Submission #173)

- 178 I consider there to be three key matters in this submission:
- 178.1 Ability of public transport to service the subdivision, including the design of an ODP which maximises catchment and futureproofs opportunities to develop the catchment into future development stages of northeast Kaiapoi.
 - 178.2 The intersection of Beach Road / Tuhoe Avenue, and delays in the morning peak (including delays to future public transport services), and the greater vehicle flows using Tuhoe Avenue than Beach Road, possibly suggesting need for change in intersection priority.
 - 178.3 Capacity of Williams Street / Beach Road roundabout, and the likelihood of signals being required.
- 179 Public transport services would require accommodation in the design of the spine road, as well as an ODP which would provide the connectivity required to deliver public transport walkable catchments. An outcome of 90% of dwellings within the public transport catchment is a requirement of the operative District Plan. The public transport route has capacity to service commuted trips to Christchurch city, noting that half of Kaiapoi residents commute to Christchurch city.
- 180 I therefore conclude that the ODP should be developed to accommodate public transport. This would also include measures to resolve delays on Tuhoe Avenue, which would also impact on public transport vehicles.
- 181 In my opinion, the Williams Street / Beach Road intersection should be signalised. The evidence of Mr Carr considers a range of possible development outcomes (and subsequent development traffic), and he

recommends network mitigation scaled to each outcome. However, I specify reasons why I consider that the minimum mitigation would not be effective, and further that a threshold for signals would likely occur at a point of increased demand which would be far lower than that generated by the maximum development outcome.

182 In my opinion, a development outcome mid-way between minimum and maximum would likely require generate the need for signals, and this should be tested in modelling.

183 Further consideration should be given to northeast Kaiapoi, and the possible need for designation to support intersection upgrades. Staging of the development and infrastructure should be planned concurrently.

Suburban Estates (Submission #208)

184 I have not seen a transport assessment included in this submission

185 I would support an assessment which commits to safeguarding and developing a north-south public transport corridor, and achieving 90% of development within the public transport catchment which at least meets the operative plan requirements. I would further support inclusion of walkable neighbourhood centres, and delivery of a quality active travel connection to Kaiapoi town centre.

186 Intersection upgrades, such as the Williams Street / Beach Road intersection should be identified. The outcome for submission #173 – which was for approximately one third of the traffic which could occur under this submission – was a signalised intersection, contained within the road boundary. In my opinion, there is a possibility that a larger intersection could be required if the rezoning sought in submission #208 was also granted, and this will require appropriate consideration, including use of a strategic network model.

Waimakariri District Council

GOLF LINKS ROAD INFRASTRUCTURE SERVICING

12 JANUARY 2024

PUBLIC



GOLF LINKS ROAD INFRASTRUCTURE SERVICING

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Approved by:	Bridget O'Brien	12/01/2024

This report ('Report') has been prepared by WSP exclusively for Waimakariri District Council ('Client') in relation to the high-level review of geotechnical, groundwater and cost estimation for servicing seven sections located on Golf Links Road ('Purpose') and in accordance with the Service Proposal for Proposed Waimakariri District Plan Assistance, confirmed 23/11/23 ('Agreement'). The findings in this Report are based on and are subject to the assumptions specified in the Report and Offer of serviced confirmed 23/11/23]. WSP accepts no liability whatsoever for any reliance on or use of this Report, in whole or in part, for any use or purpose other than the Purpose or any use or reliance on the Report by any third party.



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1 PROJECT BACKGROUND

Waimakariri District Council (WDC) has received submissions relating to the infrastructure servicing (stormwater, wastewater and reticulated water) for seven residential properties located on Golf Links Road, Rangiora. The seven properties (Figure 1-1) which cover approximately 16.4 hectares across the following properties:

- 7, 19, 35, 39, 49 and 59 Golf Links Road
- 8 Kippenberger Avenue

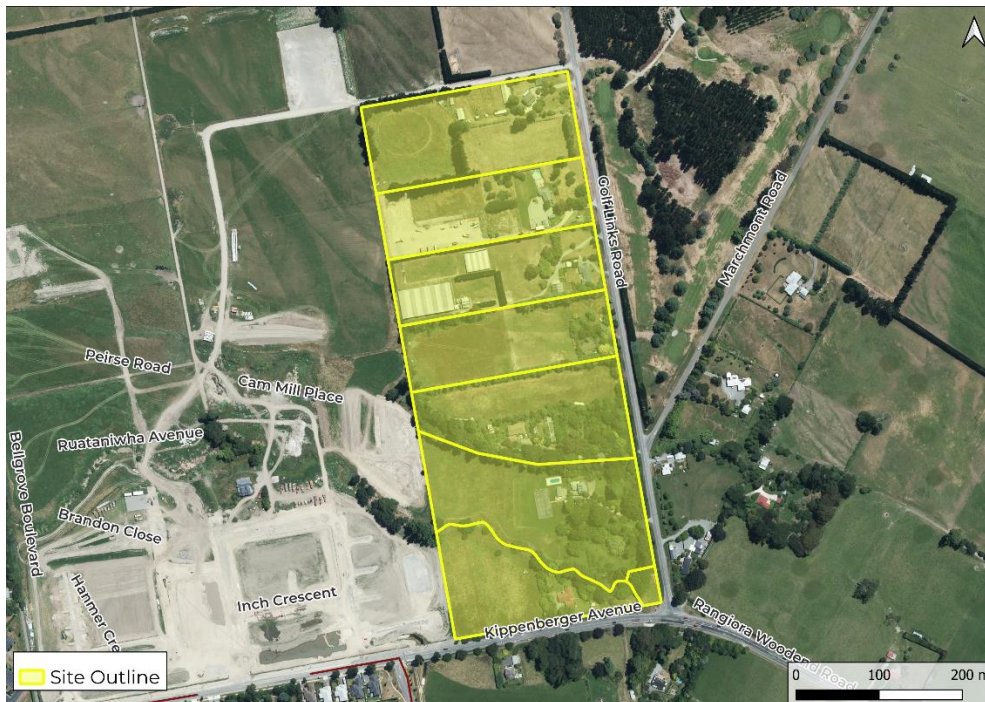


Figure 1-1: Properties for potential servicing

The seven properties are located within Projected Infrastructure Boundary for the Operative Plan but are not currently serviced with reticulated water supply or wastewater.

WSP Limited has been engaged by WDC to complete the following tasks:

- Provide a brief understanding of the geotechnical and groundwater situation on the west side of Golf Links Road (i.e. between Golf Links Road and the Bellgrove development).
- Provide a high-level independent assessment for the cost of providing services (including water, wastewater, stormwater) to the approximately seven blocks of land on the west side of Golf Links Road area. Council has a high-level engineering diagram/asset plan for this area, but no understanding of costs. The caveat here is that any plans to extend services to this area would need to be consistent with Council's high-level plans.

This report summarises the review of the geotechnical and groundwater information available for the area, potential servicing options for wastewater, stormwater and reticulated water and the high-level costs associated with construction of these services within Kippenberger Avenue and Golf Links Road.

The report is based on the preliminary information available and intended to provide high-level cost estimates to WDC to assist with Proposed District Plan submissions.

2 GEOTECHNICAL AND GROUNDWATER

We have undertaken a desktop review of the New Zealand Geotechnical Database (NZGD) and Environment Canterbury online database with respect to geotechnical conditions and groundwater.

2.1 NEW ZEALAND GEOTECHNICAL DATABASE ONLINE GIS DATABASE REVIEW

A review of the NZGD has found several investigation sites next to the sections being considered for servicing. 11 test pits and 2 boreholes have been reviewed for geology and groundwater levels. The site is predominantly overlain by silt to approximately between 0.5 and 1.5 m below ground level (bgl) (thinning towards the east), underlain by silty sandy gravels down to depths of at least 15 m deep (borehole depth). The highest groundwater level recorded is 2.9 m bgl encountered in TP189026 and was the only groundwater level recorded in all test pit logs reviewed. Both boreholes recorded a groundwater level of 4.0 m bgl.

2.2 ENVIRONMENT CANTERBURY GIS REVIEW OF INFORMATION

2.2.1 WELLS

A review of the Environment Canterbury online GIS database and determined that several domestic supply wells are present across the proposed development sections. Most are installed down to depths of approximately between 7.0 and 10.0 m bgl. None of these records have a groundwater level recorded, however, it is presumed that the water level lies some way up the casing, where it can be drawn from for water supply purposes and therefore water levels in these bores are somewhat higher than the well depths recorded.

2.2.2 SPRINGS

There are 10 springs listed on the Environment Canterbury GIS along the property boundary between 7 Golf Links Road and 8 Kippenberger Avenue. These are listed as gravitational springs, which means this is where the ground surface intersects the groundwater table within the incised stream bed. Reviewing Canterbury 1.0 m LiDAR elevation data suggests that the incised stream bed is generally 2.5 to 3.0 m lower than the surrounding topography, and assuming that the stream bed represents the stream stage height, its water level is a similar depth to what is observed in the nearby boreholes. Furthermore, artesian pressures do not appear to be present within the development area and springs are not artesian in nature within the development area.

2.2.3 COMMUNITY DRINKING WATER PROTECTION ZONES

A review of the Environment Canterbury online GIS database has determined that the sites do not lie within a drinking water protection zone.

3 INFRASTRUCTURE SERVICING

The total area for all seven sections is approximately 16.4 hectares. A Medium Residential Density for all the sections has been assumed with approximately 27 dwellings per hectare for the fully developed sites. This equates to approximately 442 dwellings. This density has been assumed as the upper range of density which could theoretically be implemented under the Operative Plan and does not represent any proposed development plans.

3.1 WASTEWATER

We have made the following assumptions for the wastewater servicing assessment:

- The seven sections can be potentially serviced through gravity wastewater from 59 Golf Links Road to the corner of Golf Links Road and Kippenberger Avenue.
- There is an existing culvert at the intersection of Golf Links Road and Marchmont Road which crosses an unnamed channel. The size of the culvert is unknown and therefore further investigation is required to confirm if a gravity main can be directed underneath the culvert. We assume it is possible to install gravity pipeline underneath the culvert without increasing the depth of the pipeline.
- A new pump station (<20 L/s) will be required at 8 Kippenberger Avenue and a 125 mm OD PE rising main will be required to cross over the existing Cam River at the bridge located on Kippenberger Avenue.
- A new pump station has been completed within the Bellgrove subdivision and a future 280 mm OD PE pressure main connection has been installed to intersection of Kippenberger Avenue and Devlin Avenue. It is assumed that the pump station and this 280 mm OD pipeline has sufficient capacity for the estimated flow from the full developed sections and that a direct connection can be made to this pressure pipeline at Kippenberger Avenue.
- The WDC Code of Practice were used to determine the Peak Wet Weather Flow for the wastewater discharge from the fully developed site. A maximum density of 27 dwellings per hectare which includes an 15% allowance for reserves and roading was adopted in the wastewater calculations.
- Trenching costs and pipe depths have been based on a review of the existing LIDAR information available, with a minimum of 1.5 m pipe cover and a grade of 1:200 for gravity pipelines. This upstream depth assumes that additional WDC owned infrastructure with lateral connections within privately owned sections will be required within the developed sites at the minimum grades required in accordance with the WDC Code of Practice.
- It is anticipated that dewatering will not be required for trenched pipe install due to the estimated maximum pipe depth of <2.5 m.

The proposed wastewater configuration is shown in Figure 3-1.

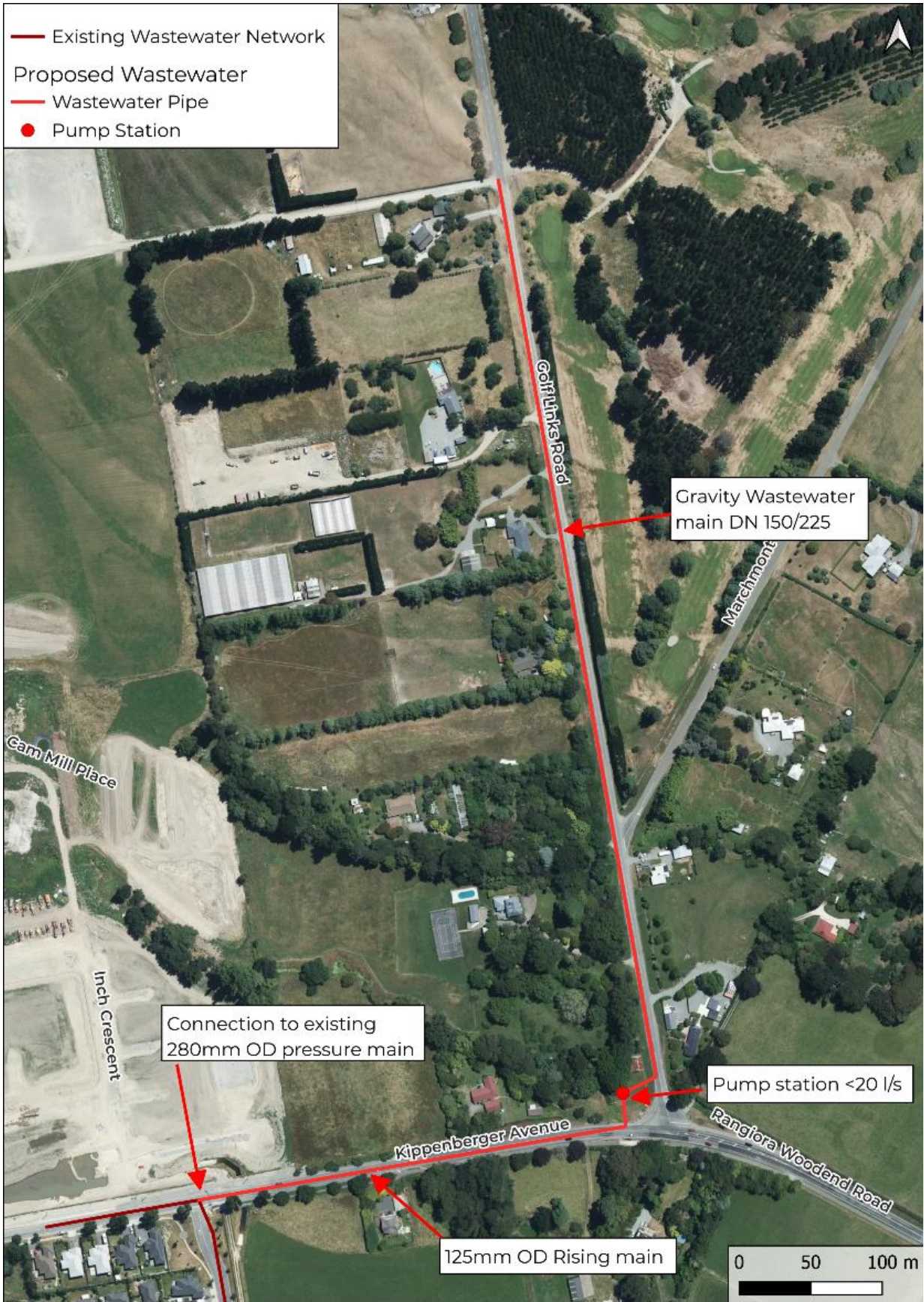


Figure 3-1: Indicative wastewater servicing

3.2 STORMWATER

We made the following assumptions for the stormwater servicing assessment:

- Total development area is 164,300 m² (16.4 ha)
- WDC prefers constructing an infiltration basin to manage stormwater from the development, to be consistent with the nearby Bellgrove development (which is also using infiltration basins).
- Infiltration basin will be constructed within the development boundary.
- Infiltration basin is sized to accommodate flood flows up to the 2% annual exceedance probability (AEP) event with consideration of climate change effects to rainfall (RCP 8.5 2081-2100), in accordance with the Building Code and WDC Engineering Code of Practice.
- One single basin will serve all lots.
- Flows from outside lots do not enter the basin; assumed to be diverted elsewhere (design by others)
- In-situ soils are free-draining, i.e., soakage rates of >100 mm/hr
- Design rainfall based NIWA HIRDS V4.0 taken at Site ID H32351 “RANGIORA”
- Runoff model based on Rational Method using Christchurch City Council recommended rainfall profile
- Pre-development runoff coefficient is 0.20 (0% impervious)
- Post-development runoff coefficient is 0.65 (roughly 50% impervious), in accordance with WDC Engineering Code of Practice.
- Basin is rectangular with a ratio of Length = 10 x Width to allow flexibility for shaping
- Headwater/tailwater conditions do not govern basin design.
- Batter slopes of 1V:4H
- 3.0 m wide sealed access lane around the basin perimeter
- Basin is 1 m deep
- Stormwater disposal within basin up to the 2% AEP event is through soakage only
- Design soakage rates were set to 20 mm/hr and 30 mm/hr assuming topsoil lining and allowing for Factor of Safety (FoS). These infiltration rates were based on design guidelines recommended by Christchurch City Council and allow long term function without extensive maintenance. .

3.2.1 HIGH-LEVEL BASIN SIZING

Table 3-1 summarises the basin footprints required to prevent any overflows up to the 2% AEP event for all storm durations up to 48 hours.

Footprints using different design rainfalls based on current climate conditions and future climate projects are shown for comparison purposes. Potential staging can be considered given the differences in resulting footprints. For example, WDC may choose to initially construct the basin

based on current climate statistics and expand the basin to allow for future climate change at a later stage with the space set aside now.

Table 3-1: Infiltration basin footprint with 3.0 m perimeter access lane

BASIN SOAKAGE RATE	CURRENT CLIMATE (m ²)	RCP 8.5 2080-2100
20 mm/hr	11,900	14,100
30 mm/hr	10,400	12,400

3.2.2 RECOMMENDATIONS

To refine the stormwater design, we recommend the following:

- Perform in-situ soil soakage testing and install piezometers to monitor groundwater levels within the area, prior to design to validate soakage rates and better understand the potential influence of groundwater on the system and to reduce post construction risks.
- Allow appropriate FoS when selecting the design soakage rate. Things to consider include long-term maintenance effects, quality of testing and groundwater mounding. Test the supplied basin media prior to commissioning to confirm if the design FoS is met.
- Size the basin to allow full depth draw-down within two days to help in managing subsequent storm events.
- Incorporating an element of discharge to adjacent waterways for events exceeding the water quality volume may allow for the extent of the basin to be optimised.
- Confirm tailwater conditions for the basin to achieve free discharge conditions, or modify the scheme as required where backwater effects govern.

3.2.3 EXCLUSIONS

We did not undertake the following as part of this assessment:

- Flood modelling or consideration of tailwater conditions during floods
- Detailed hydrology or hydrogeological assessment
- Flood risk assessment
- Assessment of environmental effects (AEE)
- Detailed engineering and design
- 3D earthworks modelling and schedule of quantities.
- Ecological assessment
- Planning checks
- Archaeological assessment
- Assessment of potential contaminated land
- Safety by Design considerations

Values presented in this report should not be used for construction purposes without undertaking further design work and site investigations.

3.3 RETICULATED WATER SUPPLY

We made the following assumptions for the reticulated water supply servicing assessment:

- The seven sections can be serviced through an extension of the existing 200mm OD PE watermain located in Kippenberger Avenue as agreed with WDC.
- The 200mm OD PE watermain will be extended across the Cam River and a new tee installed at the intersection with Golf Links Road with a 160mm OD PE watermain continuing up Golf Links Road to service the section sections. The 200mm OD PE pipeline from the tee will be terminated with a fire hydrant to allow for extension in the future and servicing of any additional growth areas to the east of Golf Links Road.

The proposed reticulated configuration is shown in Figure 3-2.

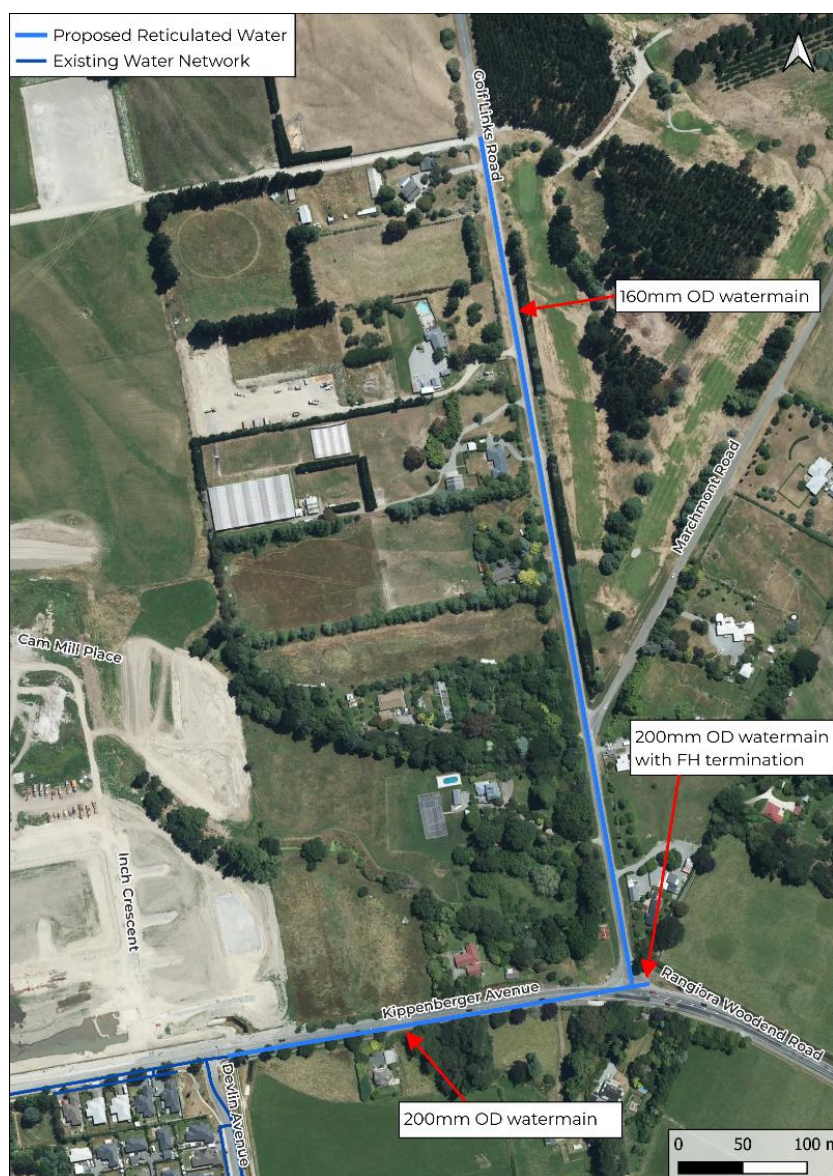


Figure 3-2: Indicative reticulated water supply servicing

4 COST ESTIMATES

In summary, we anticipate that the seven sections which cover approximately 16.4 hectares from 8 Kippenberger Avenue through to 59 Golf Links Road can be potentially serviced through extensions to the existing WDC wastewater and reticulated water network. If these sections were developed with a medium density, this would equate to approximately 442 dwellings.

The stormwater management for the seven sections could be serviced through an infiltration basin located within 8 Kippenberger Avenue.

We have prepared high level cost estimates based on the following assumptions:

- We recommend that a full engineering design and cost estimation is completed during the land development and consenting process.
- Physical works are undertaken within local roads
- Wastewater pump station costs have been calculated with an appropriate contingency due to the complexity and unknown considerations (i.e. specific geotechnical input) associated with this portion of work.
- The water and wastewater pipes at the bridge crossing can be self-supporting with minimal footings and rely on the existing bridge to provide bank stability.
- Water supply and wastewater cost estimates have been referenced from similar WSP projects including in Christchurch and Timaru.

We have included the following in our cost estimates:

- Pipelines and manholes
- The water supply cost estimate includes hydrants, tees, and valves (estimated at 100m intervals).
- Stormwater infiltration basin
- Temporary works
- Preliminary and General (10%)
- The cost estimate for the pump station includes land purchase at approximately \$200,000.
- We have included an allowance of approximately \$30,000 for the bridge crossing for wastewater and \$30,000 for water supply.

We have not included the following items in the cost estimates:

- Design fees
- Consenting
- Project management
- Road upgrades
- Infrastructure servicing within the separate titles
- Conveyance of stormwater to the infiltration basin

- The highest groundwater level recorded from our review of bore logs is 2.9 m bgl and therefore dewatering costs have been excluded from the gravity pipe installation estimates.
- GST
- Escalation.

4.1 WASTEWATER COST ESTIMATE

A high-level cost estimate for the proposed wastewater servicing is summarised in Table 4-1.

Table 4-1: Wastewater cost estimates

Size (mm)	Depth (m)	Description	Length/number	Cost
150 PVC pipe	1.5-2.5	PVC SN16	320	\$163,000
225 PVC pipe	1.5-2.5	PVC SN8	340	\$248,000
1050 PVC pipe	1.5-2.5	Concrete MH	10	\$61,000
125 PE pipe	<1.5	PE100 PN16	500	\$416,000
Bridge crossing				\$30,000
Pump station <20 L/s		Small PS	1	\$800,000
Total				\$1,720,000

4.2 STORMWATER COST ESTIMATE

Figure 4-1 graphs the estimated cost of constructing the proposed infiltration basin, based on the *Evaluation of Stormwater Treatment Construction Costs - A Canterbury Specific Assessment* (Opus, 2016), which was prepared for the Canterbury Regional Stormwater Forum. This report provides different cost ranges across different stormwater treatment devices (including infiltration basins) based on infrastructure footprint and project complexity and constraints.

As there is insufficient information about site-specific constraints, for this high-level assessment we consider the basin to fall within the medium and high-cost range. Based on the graph, the proposed infiltration basin is estimated to cost in the range \$0.50 - \$1.65 million. Factors influencing this include, for example, the distance to a suitable landfill site and potential for contaminated soils. Note that the cost graph shown in Figure 1 was based on prices recorded up to 2016. Allowing for inflation up to December 2023 (average of 3.0% per year), the adjusted cost estimate would fall within **\$0.63 - \$2.09 million**.

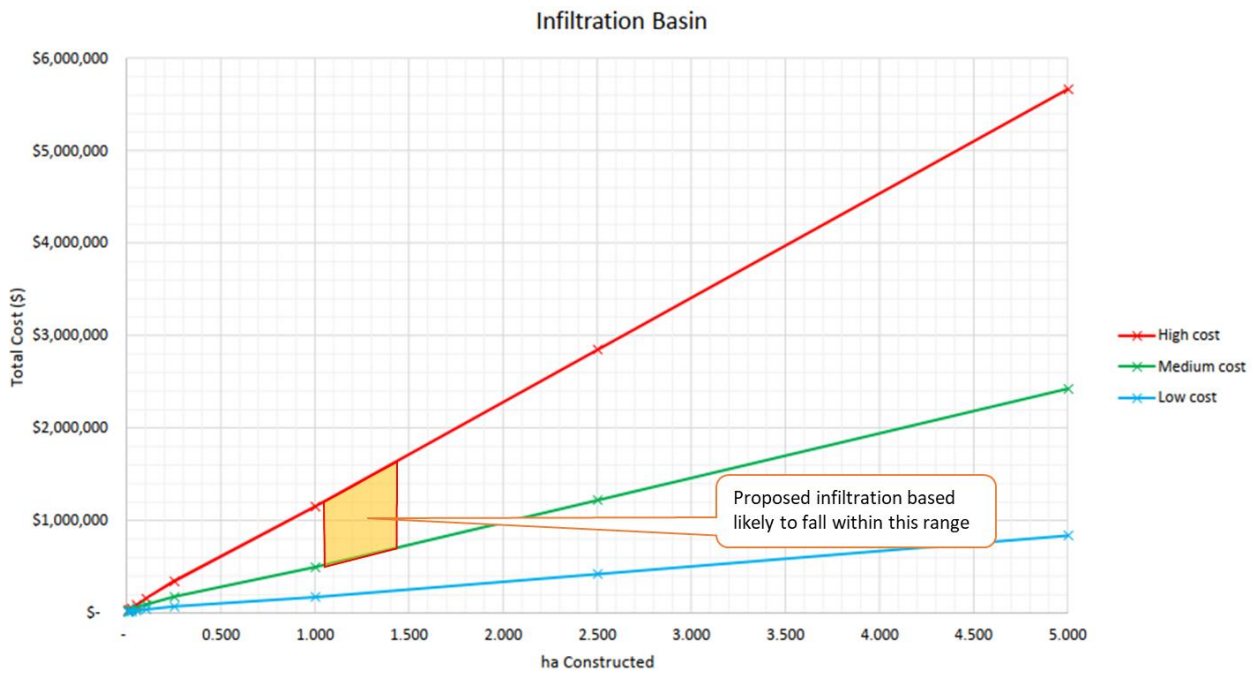


Figure 4-1: Infiltration basin cost estimate (source: Opus, 2016)

4.3 WATER SUPPLY COST ESTIMATE

A high-level cost estimate for the proposed reticulated water supply servicing is summarised in Table 4-2.

Table 4-2: Reticulated water supply cost estimates

Size (mm)	Depth (m)	Description	Length/number	Cost
160mm OD PE	<1.5	PE100 PN16	660	\$355,000
200mm OD PE	<1.5	PE100 PN16	651	\$350,000
Bridge crossing				\$30,000
Total				\$735,000

4.4 OVERALL SERVICING COST ESTIMATE

The estimated costs associated for servicing the seven sections with wastewater, stormwater and reticulated water are summarised in Table 4-3. The accuracy of the cost estimate is in the range of -30% +100% (Class 5 Association for the Advancement of Cost Engineering International). We therefore recommended that an additional project contingency of approximately 50% is added to the total servicing costs to reflect the high-level nature of the cost estimates.

Table 4-3: Estimated infrastructure servicing costs

Item	Cost estimate
Wastewater	\$1,720,000
Stormwater (med-high)	\$630,000 - \$2,090,000
Reticulated water supply	\$735,000
Total	\$2,350,000 - \$3,810,000

5 LIMITATIONS

This report ('Report') has been prepared by WSP New Zealand Limited ('WSP') exclusively for Waimakariri District Council ('Client') in relation to the high-level review of geotechnical, groundwater and cost estimation for servicing seven sections located on Golf Links Road ('Purpose') and in accordance with the Service Proposal for Proposed Waimakariri District Plan Assistance, confirm 23/11/23 ('Agreement'). The findings in this Report are based on and are subject to the assumptions specified in the Report and the Offer of Services 10/11/23. WSP accepts no liability whatsoever for any use or reliance on this Report, in whole or in part, for any purpose other than the Purpose or for any use or reliance on this Report by any third party.

In preparing this Report, WSP has relied upon data, surveys, analysis, designs, plans and other information ('Client Data') provided by or on behalf of the Client. Except as otherwise stated in this Report, WSP has not verified the accuracy or completeness of the Client Data. To the extent that the statements, opinions, information, conclusions and/or recommendations in this Report are based in whole or part on the Client Data, those conclusions are contingent upon the accuracy and completeness of the Client Data. WSP will not be liable for any incorrect conclusions or findings in the Report should any Client Data be incorrect or have been concealed, withheld, misrepresented or otherwise not fully disclosed to WSP.

187 In conclusion, strategic planning to develop quality multi-modal transport outcomes within the ODP (and surrounding improvements) will be the key to achieving an efficient and well-functioning transport outcome.

Date: 05/07/24

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

.....

Appendix F. Council internal expert evidence

**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

Statement of evidence of Shane Binder (Transport), John Aramowicz (Servicing, Hazards), Christopher Bacon (Hazards), Jon Read (Green Space) on behalf of Waimakariri District Council.

Date: 15 July 2024

INTRODUCTION:

Mr Shane Isaac Binder (Transport)

1 My full name is Shane Isaac Binder. I am employed as the Senior Transportation Engineer for 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 transportation technical advice, identifying any significant constraints.

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

Mr John Thomas Aramowicz (Servicing, Hazards)

5 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.

6 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**).

7 Specifically, this statement of evidence relates to civil, hazards 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.

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

Mr Christopher Paul Bacon (Hazards)

9 My full name is Christopher Paul Bacon. I am employed as a Network Planning Team Leader at Waimakariri District Council. In this position I am involved with planning for infrastructure growth and flood modelling.

10 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**).

11 Specifically, this statement of evidence relates to servicing and hazards technical advice, identifying any significant constraints.

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

Mr Jonathan Spencer Read (Green Space)

13 My full name is Jonathan Spencer Read. I am employed as a Green Space and Community Facilities Planner.

14 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**).

15 Specifically, this statement of evidence relates to Proposed District Plan rezoning requests.

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

QUALIFICATIONS AND EXPERIENCE

Mr Shane Isaac Binder (Transport)

- 17 I hold the qualifications of Bachelor of Science in Civil Engineering from Pennsylvania State University (USA), and a Master of Science degree in Civil Engineering from the University of Colorado (USA), both with specialisations in transport.
- 18 I have more than 22 years' experience as a professional traffic engineer and road safety specialist, both in New Zealand and abroad. I have had the position of Waimakariri District Council Senior Transportation Engineer for the last three years. In this role I manage the District's transport planning, strategy, and engineering functions, including road safety, traffic modelling, parking, and public transport elements.
- 19 Although this matter relates to a District Council 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 when making my brief summary statements. My qualifications as an expert are set out above.
- 20 I am a Chartered Professional Engineer (CPEng), a Professional Engineer (Colorado and Washington State, USA), and a Road Safety Professional (Level 1) certified by the Institute of Transportation Engineers. I am a Chartered Member of Engineering New Zealand. I am also a member of the Transportation Group of Engineering New Zealand and am on the steering committee of the Safety Practitioners Sub-group.

Mr John Thomas Aramowicz (Servicing, hazards)

- 21 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.

- 22 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.
- 23 I was employed by Eliot Sinclair from April 2004 until April 2022. I was a Principal of Eliot Sinclair from 2015 to 2022, and was elected as a Director of Eliot Sinclair in mid-2019 before resigning from the role in November 2021.
- 24 Subsequently was employed by the Waimakariri District Council from August 2022 to December 2022 on a part-time basis, and then as a casual employee up to January 2024.
- 25 I was also employed by Miyamoto International New Zealand Limited (MINZ) on a casual basis from September 2022 to January 2024. Each of the projects I assisted MINZ with were located outside the Waimakariri District Council area.
- 26 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.
- 27 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.
- 28 Although this matter relates to a District Council 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 when making my brief summary statements. My qualifications as an expert are set out above.

29 I note that several submissions have included technical reporting that was undertaken by Eliot Sinclair.

30 Two of Eliot Sinclair's submissions, submission #224 and submission #266, contain technical reports from 2021 that I had reviewed and signed in my former role with Eliot Sinclair.

31 The *Natural Hazards Risk Assessment* report for 2 Ashworths Road (submitter #224) was reviewed and signed by me on 19 July 2021. This submission was part of Stream 12C, and my assessment of the submission was included in my memo prepared for that stream.

32 The following documents were reviewed and signed by me during my former role with Eliot Sinclair, and have been included with submission #266 which is part of Stream 12E. My assessment of submission #266 was included in my memo prepared for that stream:

32.1 *"Pre-Purchase Ground Contamination Assessment. 163 Johns Road, Rangiora"* dated 26 February 2018,

32.2 *"Pre-Purchase Geotechnical Desktop Report, 163 Johns Road, Rangiora"* dated 26 February 2018,

32.3 *"Pre-Purchase Ground Contamination Assessment. Preliminary Site Investigation (PSI) for 199 Johns road, Fernside, Rangiora"* dated 7 June 2019, and

32.4 *"Risk of Natural Hazards & Soil Contaminations at 163 ~ 203 Johns Rd, Rangiora"* summary letter, dated 25 November 2021.

33 To ensure I have provided a fair and unbiased review, and to minimise the risk of unintentional bias, I have committed to assessing each submission on its merits, regardless of the author, and have taken steps to mitigate any potential conflict of interest. To achieve this, I have

discussed each submission I reviewed, including the Eliot Sinclair reports that I have previously signed, with other Council engineers to reach agreement on any significant matters.

34 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.

35 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.

Mr Christopher Paul Bacon (Servicing, Hazards)

36 I am a Chartered Professional Engineer and hold a Bachelor Degree in Civil Engineering. I have over 20 years of experience in civil engineering.

37 My summary statement has predominantly been based on modelling data shown on the Waimakariri District Council's 'Waimaps' geographical information system (GIS), much of which I was responsible for coordinating and managing, and from my discussion with other WDC engineers.

38 Although this matter relates to a District Council 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 when making my brief summary statements. My qualifications as an expert are set out above.

39 Except where I state I rely on the evidence of another person, I confirm that the issues I have reviewed and any brief summary statements that I have made 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.

Mr Jonathan Spencer Read (Green Space)

40 I hold the qualifications of Bachelor Degree in Resource Studies.

41 I have worked for 30 years in the local authority field of parks, recreation and open space planning.

Code of conduct

42 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

Mr Shane Isaac Binder (Transport)

43 My name is Shane Isaac Binder.

44 I have been asked by the Council to provide transportation evidence in relation to rezoning requests.

45 My statement of evidence addresses transportation.

Mr John Thomas Aramowicz (Servicing, hazards)

46 My name is John Thomas Aramowicz.

47 I have been asked by the Council to provide civil, hazard and geotechnical engineering evidence in relation to rezoning requests.

Mr Jonathon Spencer Read (Green Space)

48 My name is Jonathan Spencer Read.

49 I have been asked by the Council to provide Green Space evidence in relation to rezoning requests.

50 My statement of evidence addresses various submission and evidence in relation to green space matters, as requested by the Report Writer.

INVOLVEMENT WITH THE PROPOSED PLAN

Mr Shane Isaac Binder (Transport)

51 I have been involved in the PDP since March 2021, providing advice when requested on general transport rules and activity standards.

Mr John Thomas Aramowicz (Servicing, hazards)

52 I have been involved in the PDP since March 2024.

Mr Jonanthan Spencer Read (Green Space)

53 I have been involved in the PDP since 2018.

SCOPE OF EVIDENCE

54 This statement of evidence addresses matters raised by submitters in relation to transport, civil, hazards and geotechnical engineering.

55 Attachment A includes memoranda from John Aramowicz, Chris Bacon and Jon Read.

56 Attachment B includes expert transportation evidence provided by Mark Gregory (WSP).

Date: 15 July 2024

WAIMAKARIRI DISTRICT COUNCIL

MEMO

FILE NO AND TRIM NO: DDS-14-13-02 / 240517079328

DATE: 15 July 2024

MEMO TO: Peter Wilson, Principal Policy Planner

FROM: John Aramowicz, Senior Civil & Geotechnical Engineer

SUBJECT: Proposed District Plan Rezoning Requests
Stream 12E – Servicing, Natural Hazards, Geotechnical Matters

I write to summarise the issues that relate to water, wastewater and stormwater services, and the presence of any significant natural hazards or geotechnical matters that should be taken into account when considering the applications to rezone the following sites to General Residential Zone (GRZ) or Medium Density Residential Zone (MDRZ).

Firstly, however, I would like to highlight the recent publication by the Ministry for the Environment, “*Coastal hazards and climate change guidance*”, that was released on 29 February 2024.

Coastal hazards and climate change guidance

1. Waimakariri District Council’s Engineering Code of Practice requires a developer to “*discuss protection standards in tidal areas with ECan and the Council at an early stage. Storm surge and tsunami hazards, climate change, the District Plan requirements, and sea level rise must be considered, and a precautionary design approach is recommended*”.
2. The Ministry for the Environment’ (MfE) has previously provided guidance on coastal hazards and climate change through publications issued in 2008, 2017, and interim guidance in 2022.
3. Based on previous guidance, it has been common practice in Canterbury to assess the effects arising from 1.0m of sea level rise (SLR) occurring by the end of the century (i.e. 2100).
4. The Waimakariri District Council’s (WDC) Network Planning Manager, Chris Bacon, confirms the flood modelling that is currently shown on WDC’s natural hazard viewer, which I address in this memorandum, is based on 1.0m of SLR occurring by the end of this century. WDC’s flood modelling went through an extremely robust development process, including extensive modelling runs and peer review over many months, to ensure the flood hazard mapping is the best available.
5. The Waimakariri District Council have considerable experience with problems caused by coastal inundation and vertical land movement (i.e. subsidence) along the coast, particularly to the coastal areas around Kaiapoi where many areas are subject to a medium to high food hazard.
6. The MfE’s most-recent update to its guidance, “*Coastal hazards and climate change guidance*”, was recently released on 29 February 2024.
7. Given the timing of this, and the level of effort and time required to assess this new data and whether updates are required in response to it, Council’s existing flood hazard data

is considered the appropriate tool to assess these submissions at this time. Neither the Submitters nor Council have not been able to consider the updated guidance in relation to the Proposed District Plan. I have therefore assessed the following applications against the existing flood hazard assessments recorded on WDC's natural hazards viewer/GIS. This is consistent with my hazard reviews for the other rezoning streams.

Submission 290 (Doncaster Developments) – Cnr Lehmans & Parrott Road, Rangiora

8. The application site is located at the northern end of Lehmans Rd, near the Rangiora racecourse. The land can generally be described as flat but has a slight fall from the west down to the east. There is an overland flow channel just north of the site.

Natural Hazards

9. Current flood hazard mapping on WDC's GIS for a Localised Flooding Hazard 200yr scenario indicates the site is almost entirely within a zone of very low flood hazard. There are some broken up low hazard flow paths crossing the site, with a medium flood hazard overland flow path directly to the north of the site, following the northern boundary.
10. There is a small area of medium flood hazard to the northeast of the site in the Breakout Flooding Hazard 200yr scenario, but the development site itself is not directly affected.
11. There are no active faults, nor significant risk from liquefaction, nor likely deposits of peat.
12. In summary, there are no significant risks from natural hazards that would prevent the proposed land use.

Geotechnical Matters

13. The site is in an area where, based on existing nearby land, gravels are expected to be present at shallow depth. Given this, there are no known geotechnical matters that would prevent the proposed land use.

Stormwater

14. Groundwater resurgence is not a known hazard in this area.
15. The submitter proposes to treat and attenuate stormwater onsite by discharging stormwater into ground. Drawings in the Aurecon report indicate an SWMA is to be provided at the northeast part of the site.
16. The disposal of treated SW into ground is used by the existing adjacent subdivision and is considered appropriate for the groundwater and geological conditions of the area.
17. Note there is an ECan Drinking Water Protection Zone (DWPZ) that is close to the northeast corner of the site. A DWPZ is an area within which risks to a drinking water supply intake from contaminant sources are identified and appropriately managed. Any proposed discharge of stormwater will require Resource Consent from ECan.
18. In summary, the Aurecon report indicates stormwater runoff from the proposed land use can be treated and managed onsite in a way that will avoid adverse effects to surrounding property. Given this, there are no significant issues with stormwater runoff that would prevent the proposed land use.

Wastewater

19. There will be capacity within the existing WDC network. Wastewater can discharge to the Arlington network.
20. In summary, there are no wastewater constraints that would prevent the proposed land use.

Water

21. WDC's network has allowed for capacity to service this site.

22. In summary, there are no water supply constraints that would prevent the proposed land use.

Summary

23. There are no significant constraints that relate to natural hazards, geotechnical conditions, or the ability to provide stormwater, wastewater and potable water services to the site that would prevent the proposed GRZ land use.

Submission 213 (R&B Zahner, 70 Oxford Road) & 319 (Blakemore, 3 Brick Kiln Lane) – 70 Oxford Rd & Brick Kiln Lane, Rangiora

24. The application site is in the western part of Rangiora. The submitters (s213 and 319) have not provided an assessment on the risk from natural hazards, nor the geotechnical conditions, nor an assessment of how the site can be provided with water, wastewater and stormwater services.
25. However, the ODP included in the Proposed District Plan (PDP) identifies provision for a water main that will extend from Oxford Rd to the north boundary, the main part of the site to be zoned GRZ and for a strip of MDRZ along Oxford Rd.
26. The land can generally be described as flat but has a slight fall from the northwest down to the southeast.

Natural Hazards

27. Current flood hazard mapping on WDC's GIS for the Localised Flooding Hazard 200yr scenario indicates there is an area of low flood hazard along the southern boundary, indicative of low ground levels. There is an additional low to medium flow path which crosses 86 Oxford Road and 3 Brick Kiln Lane, and an area of medium to high flood hazard in 29 Brick Kiln Lane which suggests an area of lower lying land (a former clay quarry). This area ponds in the Localised Flooding Hazard 200-year scenario, showing this flood hazard results from rainfall and is not caused by the Breakout Flooding Hazard 200yr. Providing this area is filled with controlled, compacted inert earth fill to a satisfactory level, then the risk of inundation can be eliminated.
28. The area north of Oxford Road subject to these two submissions is not affected by the Breakout Flooding Hazard 200yr scenario.
29. There is no WDC swale/open drain present along Oxford Rd. In practice the flood hazard that occurs along the south part of the site, north of Oxford Road, could be avoided by filling of the site.
30. In summary, there are no significant risks from natural hazards that would prevent the proposed land use of the sites north of Oxford Road.

Geotechnical Matters

31. The submitters (213 & 319) have not provided any geotechnical evidence.
32. In my experience it is unlikely there will be a significant risk of liquefaction in this part of Rangiora.
33. My experience is that the southwest parts of Rangiora may be underlain by slightly reactive clayey silts, i.e. soils that can tend to shrink or swell due to a decrease or increase in soil moisture. However, it is also my experience that these soil conditions can be mitigated by appropriate engineering design and construction of pavements and building foundations.
34. In summary, while the submitter has not provided any geotechnical evidence, in my experience there is unlikely to be any significant geotechnical matters that would prevent the proposed land use

Stormwater

35. Groundwater resurgence is not a known hazard in this area.
36. While the submitter has not commented on future stormwater requirements, I am aware that treated stormwater is discharged into ground at the lower southeast corners of the existing subdivision developments that are immediately east and west of the site.
37. My experience is that low permeability soils may be present to around 2~2.5m depth in the area. If this is correct, then the submitter will need to provide an appropriately sized SW attenuation basin before SW runoff discharges either into ground or into the Council network. This can be addressed at time of application for subdivision and as part of detailed engineering design.
38. Given this, there are no significant issues with stormwater runoff that would prevent the proposed land use.

Wastewater

39. The submitter has not identified how a future subdivision can be serviced.
40. The site is within WDC's RGA25 growth area, and there are existing services at the boundary. Note, however, WDC ultimately proposes a gravity sewer for western Rangiora that is to drain down to the south. A temporary solution may be needed if development was to occur at this site before the gravity sewer is laid in the south. In summary, ultimately there are no significant wastewater constraints that would prevent the proposed land use.

Water

41. The submitter has not identified how a future subdivision can be serviced.
42. WDC's network has allowed for capacity to service this site. In summary, there are no water supply constraints that would prevent the proposed land use.

Summary

43. In summary, while the submitter has not provided any technical evidence with their submission, there is unlikely to be any significant constraints that relate to natural hazards, geotechnical conditions, or the ability to provide stormwater, wastewater and potable water services to the site that would prevent the proposed GRZ and MDRZ land use.

Submission 242 (Dalkeith Holdings Ltd) – 63 Oxford Rd & 212 Johns Rd, Rangiora

44. The application site is a large site in the western part of Rangiora, between Oxford Rd in the north and Johns Rd in the south. The submitter seeks rezoning to GRZ and MDRZ
45. The land can generally be described as flat but has a slight fall from the northwest down to the southeast.
46. The submitter has not provided any technical reporting on the risk from natural hazards, nor the geotechnical conditions, nor an assessment of how the site can be provided with water, WW and SW services. The application indicates it is Council's responsibility to determine servicing requirements.
47. The West Rangiora Development Area ODP is shown in the PDP. It identifies provision for a water main that will extend from Oxford Rd to the south boundary at Johns Road. There is provision for both MDRZ in the centre of the site and GRZ elsewhere, with a stormwater reserve to be located along the eastern boundary and at the southeast corner of 63 Oxford Rd.

Natural Hazards

48. Current flood hazard mapping on WDC's GIS for the Localised Flooding Hazard 200yr scenario indicates there is an area of low-medium flood hazard across the upper north part of the site (at 63 Oxford Rd) and along the eastern boundary (of 63 Oxford Rd), and an area of low flood hazard at the southwest part of the site (at 212 Johns Rd). The area

of low flood hazard increases significantly in the Breakout Flooding Hazard 200yr scenario where large parts of the south of the site are covered by a low flood hazard. There are no areas of high flood hazard on the site in either scenario.

49. The narrow areas of low or medium localised flood hazard across the site appear to be associated with shallow alluvial channels which “fill” during rain events. The existing overland flow paths will need to be managed, with subdivision consent complying with the ODP and using the eastern area as a stormwater management strip to convey flood waters.

Geotechnical Matters

50. The submitter’s planner (Aston Consultants) notes the site is in an area where “Liquefaction damage is unlikely”. No evidence is provided by the submitter to support this, however, in my experience it is unlikely there will be a significant risk of liquefaction in this part of Rangiora.
51. My experience is that the southwest parts of Rangiora may be underlain by slightly reactive clayey silts, i.e. soils that can tend to shrink or swell due to a decrease or increase in soil moisture. However, it is also my experience that these soil conditions can be mitigated by appropriate engineering design and construction of pavements and building foundations.
52. In summary, there are no known significant geotechnical matters that would prevent the proposed land use.

Stormwater

53. Groundwater resurgence is not a known hazard in this area.
54. My experience is that low permeability soils may be present to around 2–2.5m depth in the area. The submitter will need to provide an appropriately sized SW treatment and attenuation basin at the southeast part of the site as indicated on the ODP. Ideally, treated SW should discharge into ground, however, if ground investigations find that adequate ground soakage capacity is not possible, then attenuated flows of treated stormwater could be discharged into the Council’s future network that will drain down to the south towards South Brook. The design of the stormwater treatment and attenuation system can be addressed as part of detailed engineering design for the future subdivision.
55. Given this, there are no significant issues with stormwater runoff that would prevent the proposed land use.

Wastewater

56. Site is within RGA26 growth area, and there are existing services at the boundary. Note, however, WDC ultimately proposes a gravity sewer than drains down to the south. Temporary solution may be needed if development was to occur in the north before the south. Refer to Trim 231206196569.
57. WDC Water and Wastewater 50yr scheme upgrade report identifies need for WDC to provide West Rangiora Gravity Upgrade 2 in due course to service western Rangiora developments. In summary, ultimately there are no significant wastewater constraints that would prevent the proposed land use.

Water

58. WDC’s 50yr water & wastewater scheme upgrade report, trim 231206196569, identifies future provision of the Johns Rd supply main 1 and the Lehmans Rd ring main. WDC’s network has allowed for capacity to service this site. In summary, there are no water supply constraints that would prevent the proposed land use.

Summary

59. There are no significant constraints that relate to natural hazards, geotechnical conditions, or the ability to provide stormwater, wastewater and potable water services to the site that would prevent the proposed GRZ and MDRZ land use.

Submission 246 (M Hales) – 126 Lehmans Rd, Rangiora

60. The application site is located to the west of Rangiora, at the corner of Lehmans and Johns Rd. The submitter seeks GRZ and MDRZ.
61. The submitter has not provided an assessment of how the site can be provided with water, WW and SW service, but has provided a geotechnical report that comments on the risks from various potential natural hazards.
62. The application indicates it is Council's responsibility to determine servicing requirements.
63. An ODP is shown in the PDP that identifies provision for a new water main along Lehmans Rd and across the upper north part of the site, with the main part of the site to be zoned GRZ and for a strip of MDRZ at the south facing onto Johns Rd.
64. The land can generally be described as flat but has a slight fall from the northwest down to the southeast.

Natural Hazards

65. Current flood hazard mapping on WDC's GIS for a Localised Flooding Hazard 200yr event indicates there is a narrow area of low-medium flood hazard across the lower south part of the site and along the south boundary along Johns Rd. The areas at low flood hazard are similar for the Breakout Flooding Hazard 200yr scenario, but they spread over a larger area and an area of medium flood hazard appears in the southern part of the site. There are no areas of high flood hazard on the site area in either scenario.
66. The narrow areas of low-medium flood hazard across the site appear to be associated with shallow alluvial channels. The existing overland flow path should be addressed as a condition of future subdivision consent.

Geotechnical Matters

67. No significant geotechnical or natural hazards have been identified in the submitter's geotechnical report.
68. My experience is that the southwest parts of Rangiora may be underlain by slightly reactive clayey silts, i.e. soils that can tend to shrink or swell due to a decrease or increase in soil moisture. However, it is also my experience that these soil conditions can be mitigated by appropriate engineering design and construction of pavements and building foundations.
69. In summary, there are no known significant geotechnical matters that would prevent the proposed land use.

Stormwater

70. Groundwater resurgence is not a known hazard in this area.
71. My experience is that low permeability soils may be present to around 2~2.5m depth in the area, and that groundwater may be present around 2-3m bgl. Regardless, the submitter will need to provide an appropriately sized SW attenuation basin or alternative before SW runoff discharges either into ground or into the Council network. This can be addressed at time of application for subdivision and as part of detailed engineering design.
72. Given this, I consider there are no significant issues with stormwater runoff that would prevent the proposed land use.

Wastewater

73. Site is within RGA26 growth area, and there are existing services at the boundary. Note, however, WDC ultimately proposes a gravity sewer than drains down to the south. Temporary solution may be needed if development was to occur in the north before the south. Refer to Trim 23120619569.
74. WDC Water and Wastewater 50yr scheme upgrade report identifies need for WDC to provide West Rangiora Gravity Upgrade 2 in due course to service western Rangiora developments. In summary, ultimately there are no significant wastewater constraints that would prevent the proposed land use.

Water

75. WDC's 50yr water & wastewater scheme upgrade report, trim 231206196569, identifies future provision of the Johns Rd supply main 1 and the Lehmans Rd ring main. WDC's network has allowed for capacity to service this site. In summary, there are no water supply constraints that would prevent the proposed land use.

Summary

76. There are no significant constraints that relate to natural hazards, geotechnical conditions, or the ability to provide stormwater, wastewater and potable water services to the site that would prevent the proposed GRZ and MDRZ land use.

Submission 183 (R & G Spark) – north & south of Boys Rd, Rangiora

77. The application site is located on the south-eastern fringe of Rangiora, to the north and south of Boys Rd, extending as far south as Marsh Rd. The submitter seeks, in general, GRZ and MDRZ.
78. The submitter has proposed the South East Rangiora ODP be updated, primarily to realign roading connections for the part of the site that is north of Boys Rd, however this does not identify the ODP requirements for the area of land that is to the west of the future bypass, between Marsh and Boys Rds.
79. The submitter has provided evidence from Mr Alastair McNabb regarding how the site can be provided with water, WW and SW service. There is also a Flood Risk Assessment by Mr Amir Montakhab, and geotechnical evidence from Mason Reed which discusses the geotechnical report by Fraser Thomas that also comments on the risks from various potential natural hazards.
80. The land can generally be described as flat but has a slight fall from the northwest down to the southeast.

Natural Hazards

81. Current flood hazard mapping on WDC's GIS for the Localised Flooding 200yr and the Breakout Flooding Hazard 200yr scenarios indicate a similar hazard occurs for both scenarios. Two large overland flow paths will occur across the site, each with a low-medium flood hazard. These are associated with North Brook at the north part of the site, and Middle Brook which is close to Gefkins Rd.
82. The Fraser Thomas report identifies a risk of subsidence from deposits of peat, which I discuss below.
83. The submitter's geotechnical report concludes liquefaction is not a likely hazard.
84. The Fraser Thomas geotechnical report does not address the area of low-medium flood hazard, but implies that ground levels could be raised by filling.

Geotechnical Matters

85. The Fraser Thomas (FT) report confirms there are extensive deposits of peat across the mid-north parts of the site.

86. The risk of peat consolidating increases significantly when it is subject to new loads, say from fill or building foundations. The consequence of soft ground and peat consolidating is that new roads can subside and fail prematurely, the capacity of stormwater and wastewater systems that rely on gravity drainage can reduce or cease to operate as required, and structures supported by shallow foundations can suffer differential settlement that can lead to loss of amenity and, if significant, damage.
87. To mitigate the risk of subsidence posed by the peat and soft soils, FT proposed, as one option, to allow these materials to remain in place and to place earth fill over. FT suggest that most of the (primary) consolidation (i.e. subsidence) will occur during subdivision construction (they claim up to 75mm of consolidation will occur due to preloading), but accept a small amount (2mm) of additional (secondary) consolidation (i.e. subsidence) will still occur thereafter. FT's calculations are based on assumed geotechnical properties that imply the amount of secondary subsidence that will occur after development is completed will be relatively minor.
88. A similar construction technique (i.e. preloading) was used for the construction of the Christchurch Northern Corridor motorway. Preloading typically requires the importation and movement of large volumes of earth fill that are placed uniformly across the site to increase the effective stress within the peat. This causes the peat to compress. The rate of consolidation is then monitored by accurate survey. Often, considerable time is needed until consolidation is no longer occurring. Once consolidation has ceased, the 'preload' fill can be removed to allow construction of the new roads, piped services and building foundations. For the CNC project, despite actual laboratory testing of soil samples to inform the geotechnical modelling, there was often a significant variation between the predicted and actual amounts of consolidation that occurred, and of the time needed to achieve a stable profile. In some cases, this led to significant delays, and costly re-work.
89. Unfortunately, despite construction measures undertaken as part of subdivision construction, future subsidence can still occur many decades later if shallow peat is present. It is my understanding that this can be triggered by changes in groundwater flow and chemistry that can affect the rate at which shallow (<3m bgl) peat decomposes over time. I have observed this effect at several residential properties and roads in Christchurch that are founded over shallow peat, both before and after the 2010/11 Christchurch earthquakes.
90. The FT report also accepts that in lieu of preloading, the peat could be excavated and removed, and replaced with compacted inert fill, albeit that this method would likely require temporary dewatering and would be costly. This is generally a more reliable method of minimising the risk of subsidence.
91. Given this, I consider it technically preferable that all building foundations, roads and services are not underlain by shallow peat (i.e. if peat is present, it should be at least 3m below original ground level to minimise the amount of differential settlement that can occur over short distances).
92. Alternatively, Council may agree to a subdivision development that requires any shallow peat to only be removed from future roads, providing new buildings are supported on either deep piled or stiffened-slab foundations. Council may also require a low-pressure sewer system be used to mitigate the future risk of differential settlement (subsidence) occurring between the house and the services within the roads.
93. In summary, the site contains soft ground and peat. Subdivision design and construction will need to be undertaken in a way that minimises the risk of subsidence to future roads, underground services and building foundations.

Stormwater

94. Groundwater resurgence is not a known hazard in this area.
95. There is a large area that is modelled to have a low-medium flood hazard from a Localised Flood Hazard 200yr ARI event, and an even larger area in a Breakout Flooding Hazard

200yr event. Modelled together most of the site is subject to low and medium flood hazard, with the southern end of the site worst affected by Breakout Flooding Hazard 200yr.

96. The FT Flood Assessment report, which is addressed in Mr Amir Montakhab's evidence for the submitter, identifies the results of flood modelling for a possible development of the site. The modelling indicates a future development can be undertaken in a manner that will not result in a significant increase in flood hazard to downstream properties in that flood levels downstream are calculated to increase by only 20-40mm in a Localised Flooding 200yr scenario, and a similar amount for the Breakout Flooding Hazard 200yr scenario.
97. The submitter's ODP identifies SWMA's and wetlands which appear to be in logical locations although no evidence has been provided to demonstrate the sizing of the SWMA's is appropriate. The FT report indicates effects in a 200yr event will result in increased flood depth of less than 60mm to paddocks, not more than 20mm to existing houses.
98. The use of wetlands and the need for onsite attenuation appears to be a logical approach for SW management in this area. The ODP should allow flexibility to confirm sizing of both at subdivision stage.
99. From this location of Rangiora, SW runoff from the area will ultimately drain down towards the Silverstream/West Kaiapoi area where there is an existing high flood hazard. However, I expect that with careful engineering, the effect of any additional stormwater runoff from a future subdivision to downstream catchment can be largely mitigated using onsite and/or offsite attenuation. The FT report did not investigate this.

Wastewater

100. Site is within RGA32 & 43 growth areas, and there are existing services at the boundary. Note, however, WDC ultimately proposes a pumped sewer to provide capacity to Bellgrove, which would also service this site. Trim 23120619569 WDC Water and Wastewater 50yr scheme upgrade report identifies need for WDC to provide East Rangiora Stage 2 and Stage 3 in due course to service eastern Rangiora developments.
101. The evidence by Alistair McNabb discussed the FT Infrastructure Assessment Report and concludes the existing wastewater main that crosses the site does not have capacity for the proposed development, but that there are several other engineering solutions that can be used to convey wastewater from a future development to WDC's WWTP. I agree with this.
102. In summary, ultimately there are no significant wastewater constraints that would prevent the proposed land use.

Water

103. WDC 50yr water & wastewater scheme upgrade report, trim 231206196569, identifies the future need for the Marsh Rd Supply main and Boys Rd Booster Main to service the area. In summary, there are no water supply constraints that would prevent the proposed land use.

Summary

104. The site contains soft ground and peat. Subdivision design and construction will need to be undertaken in a way that minimises the risk of subsidence to future roads, underground services and building foundations.
105. Based on existing flood hazard modelling, I expect that with careful engineering, the effect of any additional stormwater runoff from a future subdivision to the downstream catchment area can be largely mitigated using onsite and/or offsite attenuation.

Submission #413 (Bellgrove Rangiora Ltd) – Bellgrove North & South blocks, Kippenberger Ave, Rangiora

106. The application site is located to the north and south of Kippenberger Ave, which is in the northeast part of Rangiora. The land generally falls from the northwest down to the south west.

Natural hazards

107. Aurecon's evidence and 2019 report confirms the southern part of the south block (south of Kippenberger Ave) site has soft organic silts and peat and a moderate risk of liquefaction (TC2).

108. Other than the risk of subsidence due to peat and liquefaction, there are areas of low-medium flood hazard that occur in both Localised Flooding 200yr scenario, and a similar hazard in a Breakout Flooding Hazard 200yr scenario. The low-medium flood hazard areas are associated with alluvial stream channels that flows through the site, which are the headwaters of the Cam River. The need for an overland flow path for the main channel feature is reflected on the ODP.

Geotechnical matters

109. Aurecon's geotechnical report suggests the areas that are underlain by peat/soft soils are to be used for an SWMA, and that the risk of subsidence can be mitigated by preloading. The scheme plan identified on the Aurecon site layout confirms it is intended to have roads and residential lots in the same area where Aurecon identified soft organic silt/peat.

110. Aurecon's report notes the north part of the site does not have a significant liquefaction hazard nor organic silt/peat and is much better suited for residential development.

111. Aurecon identify a risk of subsidence of roads/services and indicate ground improvement may be needed, but not what minimum standard of work will be required to mitigate this risk.

112. I have already discussed how shallow peat can pose a risk of subsidence, and how the risk can be eliminated or reduced. Refer to my comments on submission 183, above, which apply equally to submission 413.

Stormwater

113. It is understood there are springs on the lower southeastern parts of the site.

114. The ODP provides for onsite treatment and attenuation wetlands. In summary, there are no known significant stormwater constraints that would prevent the proposed land use.

115. The Aurecon reporting did not investigate whether the discharge of stormwater could result in an increased flood hazard further downstream.

116. Regardless, based on existing flood hazard modelling, I expect that with careful engineering, the effect of any additional stormwater runoff from a future subdivision to the downstream catchment can be largely mitigated using onsite and/or offsite attenuation.

Wastewater

117. There is provision in the WDC 50yr growth strategy for extension of wastewater services to the application site. In summary, there are no known significant wastewater constraints that would prevent the proposed land use.

Potable water

118. There is provision in the WDC 50yr growth strategy for extension of water services to the application site. In summary, there are no known significant water supply constraints that would prevent the proposed land use.

Summary

119. The site contains soft ground and peat. Subdivision design and construction will need to be undertaken in a way that minimises the risk of subsidence to future roads, underground services and building foundations.
120. Based on existing flood hazard modelling, I expect that with careful engineering, the effect of any additional stormwater runoff from a future subdivision to the downstream catchment area can be largely mitigated using onsite and/or offsite attenuation. The ODP should allow flexibility for sizing of stormwater management areas to be confirmed through detailed design at subdivision stage.

Submission # (250) – West side, 7-59 Golf Links Rd & 8 Kippenberger Ave

121. The application site is to the east of Bellgrove, located in northeast Rangiora.
122. The land falls from the northwest down to the southeast.
123. The submission seeks to rezone the site to GRZ.
124. WSP were engaged by WDC to comment on the geotechnical setting, and servicing requirements for a future development of the area. The WSP report was issued on 12 January 2024.

Natural hazards

125. The site is located in an area where there are typically shallow depth to natural gravels, which is consistent with comments made the WSP report.
126. The submitters have not provided any geotechnical reporting. However, I note the geotechnical reporting for s179 which is located to the southwest, identified a moderate (TC2) risk of liquefaction. Given the shallow depth to gravel and the geotechnical report for s179, I conclude the site is in an area where liquefaction is unlikely to be a significant hazard.
127. There are two obvious alluvial channels located at the south part of the site, Taranaki Stream which flows down to the east under Golf Links Rd, and the headwaters of the Cam River which flows down to the south under Kippenberger Ave.
128. Both stream channels have a narrow area of medium-high flood hazard that occurs in both Localised Flooding Hazard 200yr and Breakout Flooding Hazard 200yr scenario.
129. There is a small area at the southwest corner of 8 Golf Links Rd, and another area along the western edge of Golf Links Rd, that have a low-medium flood hazard in the Localised Flooding Hazard and Breakout Flooding Hazard 200yr scenarios. These areas appear to drain to the Cam River and Taranaki Stream, respectively.
130. Other than those small areas, all other parts of the site have a very low flood hazard in both a Localised Flooding 200yr and Breakout Flooding Hazard 200yr scenarios.
131. In summary, there are no known significant risks from natural hazards that would prevent the proposed land use.

Geotechnical matters

132. In summary, there are no known significant geotechnical matters that would prevent the proposed land use.

Stormwater

133. The site is expected to be capable of discharging stormwater into ground, or alternatively onto ground/surface water (subject to provision of effective attenuation to ensure stormwater effects are neutral post-development).
134. The WSP report assumes SW will be discharged into ground using an infiltration basin that may need to have a storage capacity of around 12,400 to 14,100m³. The capacity of the basin can only be confirmed after onsite infiltration testing is completed.

135. Provision will need to be made to maintain the capacity of Taranaki Stream and the Cam River. The development cannot have effects downstream on these waterbodies.
136. In summary, the WSP report indicates onsite SW treatment and disposal into ground is preferred by Council, but further site investigation and detailed engineering design will be required. This can be provided at time of application for subdivision consent.

Wastewater

137. The WSP report discusses a possible wastewater system comprising a new gravity main to be laid up Golf Links Road, and a new pump station constructed close to 8 Kippenberger Ave that will convey the wastewater to the existing pump station at the intersection of Kippenberger Ave and Devlin Ave.
138. In summary, there are no known significant wastewater constraints that would prevent the proposed land use.

Potable water

The WSP report confirms the area will be able to connect into water supply on Kippenberger Avenue, by laying a new water main up Golf Links Road. There are no known significant wastewater constraints that would prevent the proposed land use. Summary

139. In summary, there are no significant constraints that relate to natural hazards, geotechnical conditions, or the ability to provide stormwater, wastewater and potable water services to the site that would prevent the proposed GRZ land use.

Submission #179 (Hobson) – 4 Golf Links Rd & 518 Rangiora-Woodend Rd

140. The application site is located to the east of the proposed Bellgrove development, in northeast Rangiora. It is located to the east of Golf Links Rd and east of Marchmont Rd, and north of the Rangiora Woodend Rd, outside of the development area.

Natural hazards & Geotechnical conditions

141. No peat was encountered by the geotechnical investigation.
142. The Eliot Sinclair (ES) geotechnical report concludes the soils at the site are liquefiable, and in several places the ES testing indicates there is a moderate to high risk of liquefaction. ES conclude equivalent TC2 land performance is generally predicted for the site. ES do not propose any specific rules for the geotechnical conditions. I agree that the site can be suitable for the proposed land use, albeit that geotechnical conditions will need to be imposed as a condition of subdivision consent to ensure the risk from liquefaction is mitigated - as is normal practice.
143. WDC's Breakout Flooding Hazard 200yr scenario indicates the site is outside breakout flood hazard.
144. However, the Localised Flooding Hazard 200yr scenario identifies an alluvial channel (Taranaki Stream) that has a low-medium flood hazard. This is reflected in the flood hazard modelling assessed by ES.
145. In relation to the risk of inundation that could arise from a future residential development of the site, flood modelling by ES assumed a subdivision of the site would require filling of the land to create adequate falls for drainage. Modelling of their conceptual site layout indicates, that even with diversion swales at the northwest and northeast boundaries, and with onsite attenuation of stormwater, the proposed development could result in stormwater levels at the downstream boundary increasing by between 60-100mm, while stormwater levels to the land immediately (upstream) northwest and northeast of the site could be subjected to short term increases of between 225mm (northwest) and 410mm (northeast). I consider this a significant increase.
146. However, the location of existing dwellings on adjacent properties can be identified on the ES modelling, which confirms the increase in flood depths are largely contained in existing

alluvial depressions and therefore the increase in flood depth is unlikely to cause inundation to the existing building platforms.

147. Lastly, the effects on the downstream catchment have been demonstrated by ES. While the ES 200 year modelling indicates the development will result in a 60mm increase in the depth of inundation that flows over the Rangiora-Woodend Rd, ES demonstrate that the depth and velocity of the secondary flows will be sufficiently low and therefore the increase will not cause a significant safety hazard.

Summary

148. There is a risk of liquefaction that will need to be addressed at time of subdivision.
149. Based on the Flood Impact Assessment by Eliot Sinclair, I expect that with careful engineering, the effect of any additional stormwater runoff from a future subdivision to Taranaki Stream and/or the Cam River (and therefore the Silverstream/Kaiapoi area) can be largely mitigated using adequately sized diversion swales and onsite attenuation of stormwater runoff.

Submission #214 (Stokes) – Gressons Rd

150. The application site is located south of Gressons Rd, Waikuku, and north of the Ravenswood Development that is north of Woodend. The land generally falls from the west down to the east.

Natural hazards

151. There is a large area of low-medium flood hazard that is modelled to occur in the Localised Flooding Hazard 200yr scenario. In this scenario there will be a large area of overland flows from west to east across the mid-part of the site, as well as within an alluvial channel at the south-southeast part of the site
152. However, the Breakout Flooding Hazard 200yr flood model indicates there will be no flows across the site
153. The proposed development intends to build over large parts of the site where the Localised Flooding Hazard 200yr scenario indicates there is an existing low-medium flood hazard and an existing overland flow path.
154. DLS propose to construct a series of stormwater channels that will drain from W-E across the site to convey the flood flows through the site, as well as earthworks to create adequate surface drainage systems and allow floor levels to be established at an appropriate level.
155. I note the area much further downstream of the site that stormwater will flow into already has a high flood hazard, and appears to be influenced by the effects of coastal inundation.

Geotechnical matters

156. Engeo identify various parts of the site have a moderate to high risk of liquefaction i.e. TC2 and TC3, but acknowledge this risk can be reduced by placing a raft of non-liquefiable fill, or other ground improvement, and selection of appropriate foundation systems for residential dwellings.
157. Further, the alluvial soils across parts of the site of very soft and will subside (consolidate) when subject to additional loads (or changes in groundwater levels).
158. Engeo identify the possible need for pre-loading and monitoring to mitigate the risk of subsidence occurring. I agree that this is one possible method of limiting the risk of subsidence.

Stormwater

159. The DLS Infrastructure Design report did not investigate whether the discharge of stormwater could result in an increased flood hazard to downstream properties where there is already an existing high flood hazard.

160. However, based on existing WDC flood hazard modelling, and given the nature of the site, I expect that with careful engineering, the effect of any additional stormwater runoff from a future subdivision can be largely mitigated using onsite attenuation. Sufficiently large areas would need to be allowed for to manage the very large overland flow path which crosses the site (200 year localised flood model map below; green is low hazard, blue is medium):



161. Note there is an ECan Drinking Water Protection Zone (DWPZ) in the area, which is an area within which risks to a drinking water supply intake from contaminant sources are identified and appropriately managed. Any proposed discharge of stormwater will require Resource Consent from ECan.

Wastewater

162. WDC's Chris Bacon has advised there are no existing services to the site, therefore, wastewater would need to connect to the existing services located at either Waikuku Beach or Ravenswood/Pegasus.
163. WDC should consider whether it requires any developer-laid services to be upsized to allow for additional connections/capacity.
164. Regardless, in summary, there are no known significant wastewater constraints that would prevent the proposed land use. The cost may be significant.

Potable water

165. Chris Bacon has advised that there are no existing water services to the site, and therefore a new development would need to connect to the existing services located at either Waikuku Beach or Ravenswood (or alternatively establish a compliant onsite water supply well).
166. DLS note issues with nearby onsite wells. There is no certainty provided that a DWSNZ compliant water supply could be provided onsite. Given this, it seems the lowest risk option is to connect to the existing WDC network.
167. WDC should consider whether it requires any developer-laid services to be upsized to allow for additional connections/capacity.
168. In summary, there are no known significant water supply constraints that would prevent the proposed land use. The cost may be significant.

Summary

169. There is a risk of subsidence due to the presence of soft alluvial soils. There is also a moderate to high risk of liquefaction. Regardless, there are geotechnical solutions that can be used to reduce the risk of these hazards occurring.
170. While there are areas of low-medium flood hazard associated with a large overland flow path that crosses the site, based on existing WDC flood hazard modelling and the submitter's submission, I expect that with careful engineering, the effect to downstream property from any additional stormwater runoff from a future subdivision could be largely mitigated using onsite attenuation. However, due to the land areas likely required to manage stormwater and overland flow the site may not be able to support the MDRZ zoning which is sought by the submitter.

Submission #125 (Feechney) – Chinnerys Rd, Woodend

171. The application site is located at the northwest part of Woodend, immediately south of the Ravenswood development. The ground surface falls from the southwest down to the northeast.

Natural hazards & Geotechnical Matters

172. No geotechnical information was provided by the submitter, but I expect the area to have a moderate risk of liquefaction. For instance, the geotechnical report for the Ravenswood development to the north (TRIM240426066047) indicates the land has a moderate risk of liquefaction (i.e. TC2-like) and, as a result, this land in close proximity to the large stream (further north of the application site) has a risk of major lateral stretch. The risk of lateral spreading/stretch occurring to the small channel that cross the application site is unknown.
173. The T&T data for the nearby Ravenswood area indicates there was no shallow peat present but the shallow soils are soft and plastic. There will be geotechnical mitigation measures that can be provided at time of construction to eliminate/reduce the risk of liquefaction and lateral spreading (if this risk exists). The geotechnical investigation and construction requirements for a future subdivision of the site can be addressed as a condition of resource consent.
174. The Breakout Flooding Hazard 200yr scenario indicates the site has only a very low flood hazard.
175. The Localised Flooding Hazard 200yr scenario indicates there is an area of low-medium flood hazard at the lower northeast part of the site, but most of the site has only a very low flood hazard.
176. Providing areas subject to a medium flood hazard are not developed, and any areas at high risk of subsidence/liquefaction are remediated as a condition of subdivision engineering approval, the remainder of the site is unlikely to be subject to significant hazard.

Stormwater

177. The Submitter will need to provide an ODP with an SMA located at the lower east part of the site, discharging to the old Taranaki stream channel.
178. Note there is an ECan Drinking Water Protection Zone (DWPZ) that extends across the southwest part of the site, which is an area within which risks to a drinking water supply intake from contaminant sources are identified and appropriately managed. Any proposed discharge of stormwater will require Resource Consent from ECan.
179. In summary, provided a future ODP addresses the need for onsite treatment and effective attenuation to avoid adverse effects on the downstream environment, then I consider there are no known significant stormwater constraints that would prevent the proposed land use.

Wastewater

180. There is sufficient capacity within existing network, but existing services are likely to need to be realigned to suit a future development - at the Developer's cost.
181. In summary, there are no known significant wastewater constraints that would prevent the proposed land use.

Potable water

182. The WDC 50yr growth model (TRIM231206196571) identifies upgrades needed to service Chinnerys Rd in the year 2047, and notes the existing services that cross private property are likely to need to be realigned to suit a future development at the Developer's cost.
183. In summary, there are no known significant water supply constraints that would prevent the proposed land use.

Summary

184. There are no significant constraints that relate to natural hazards, geotechnical conditions, or the ability to provide stormwater, wastewater and potable water services to the site that would prevent the proposed GRZ/MDRZ land use.

Submission #201 (Hack) – 100/110 Parsonage Rd

185. The application site is in the northeast part of Woodend. The ground surface appears to have a slight fall from the north down to the southwest.

Natural hazards & Geotechnical matters

186. No geotechnical testing was carried out on the site to inform the submitter's submission, however, based on previous work by another consultant there is a TC2 risk of liquefaction, but no risk of lateral spreading, near the WDC wastewater pump station further west of the site.
187. The Localised Flooding Hazard 200yr and Breakout Flooding Hazard 200yr scenarios both indicate the site has only a very low flood hazard.
188. In summary, there are no known significant risk from natural hazards or other geotechnical matters that would prevent the proposed land use.

Stormwater

189. The ODP identifies the location of a SWMA at the southwest part of the site where the topographic survey indicate ground levels are lowest. The area allowed for the SWMA has not been confirmed and therefore should be seen as indicative only. This should be noted on the ODP.
190. In summary, there are no known significant stormwater constraints that would prevent the proposed land use.

Wastewater

191. There is capacity within the existing WDC pump station on Parsonage Rd to accept the discharge from a future development of the site, however it is likely a small pump station will need to be provided at the site to convey wastewater from a future subdivision to the existing pump station.
192. In summary, there are no known significant wastewater constraints that would prevent the proposed land use.

Potable water

193. Submitter suggests 180mm dia water main to be extended from McQuillan Ave to site to provide sufficient supply for firefighting/potable water. 50yr growth forecast assumed growth area WDG18 would be developed in yrs 31-50.
194. In summary, there are no known significant water supply constraints that would prevent the proposed land use.

Summary

195. There are no significant constraints that relate to natural hazards, geotechnical conditions, or the ability to provide stormwater, wastewater and potable water services to the site that would prevent the proposed GRZ/MDRZ land use.

Submission #215 (Woodwater) – South of Woodend

196. The application site is located at the south part of Woodend, south of Petries Rd. Ground levels across the site typically fall from the northwest down to the southeast.
197. The submitter has provided technical reports by ENGEO and Davie Lovell-Smith that address natural hazards and geotechnical constraints, and servicing requirements for a future subdivision, respectively.

Natural hazards

198. There are areas of low-med flood hazard that will occur in the Localised Flooding Hazard 200yr scenario, predominantly along eastern and south eastern boundaries of the application area.
199. The ENGEO 'Geotechnical Investigation' report, rev 1, dated 27/02/2024, indicates there is a moderate risk of liquefaction i.e. TC2.
200. The ENGEO report indicates there could be peat present, but that peat was not encountered in the shallow test pits they carried out across the site. The Enggeo report provides no further comment on this potential hazard. (Note – the appendices to the Enggeo report were not included in the report body).
201. From my experience, I am not aware of peat being prevalent in the south part of Woodend. Given that ENGEO have not commented further on peat, and that the report states peat was not encountered in the ENGEO test pits, it is assumed that the deeper CPT site investigations did not encounter any extensive or thick deposits that could make it impossible for the proposed GRZ land use.
202. In summary, there are no known significant natural hazard or geotechnical matters that would prevent the proposed land use.

Stormwater

203. WDC indicates at this location there is no spare capacity within McIntosh's Drain in this location or the existing WDC SW ponds on Petries Rd.
204. The Davie Lovell-Smith (DLS) 'Infrastructure Report', May 2024 addresses existing servicing constraints and likely servicing requirements for a future subdivision of the site. DLS propose onsite treatment and attenuation for the main part of the site. This will need to be a new facility that is designed at the southeast part of the site.
205. Stormwater runoff from the small area that is to the east of McIntosh's Drain is to discharge to the existing Petries Rd SWMA, as long as there is an extension of the basin and the necessary land provided.

Wastewater

206. DLS accepts that upgrades to the network, and possibly to the WWTP, will be needed to be able to service the proposed land use.

207. The submitter's evidence has highlighted that either a gravity drainage system with a new pump station, or a low pressure sewer system could be used to convey wastewater from a future subdivision to the Woodend Treatment Plant. Council agrees either of these options could be used, but note low pressure can only be used where gravity is demonstrate to be not viable or achievable as per the Engineering Code of Practice.
208. In summary, there are no known significant wastewater constraints that would prevent the proposed land use.

Potable water

209. Upgrades to the network will be needed to achieve adequate supply to the site. The provisions of the LTP may need to be brought forward to allow for early development of this site.
210. In summary, there are no known significant water supply constraints that would prevent the proposed land use.

Summary

211. There are existing constraints to WDC's stormwater network, wastewater network, and water supply system, however, these can be addressed and overcome by appropriate engineering design and future upgrades to WDC's network.
212. The geotechnical report indicates the site may be underlain by soft soils that may be subject to a risk of consolidation settlement (i.e. subsidence). However, there are subdivision construction methods that can be used, i.e. preloading, to reduce the risk of subsiding occurring after subdivision construction is completed.

Submission #173 & 208 (Momentum Land Ltd. & Suburban Estates) – Beach Rd, Kaiapoi

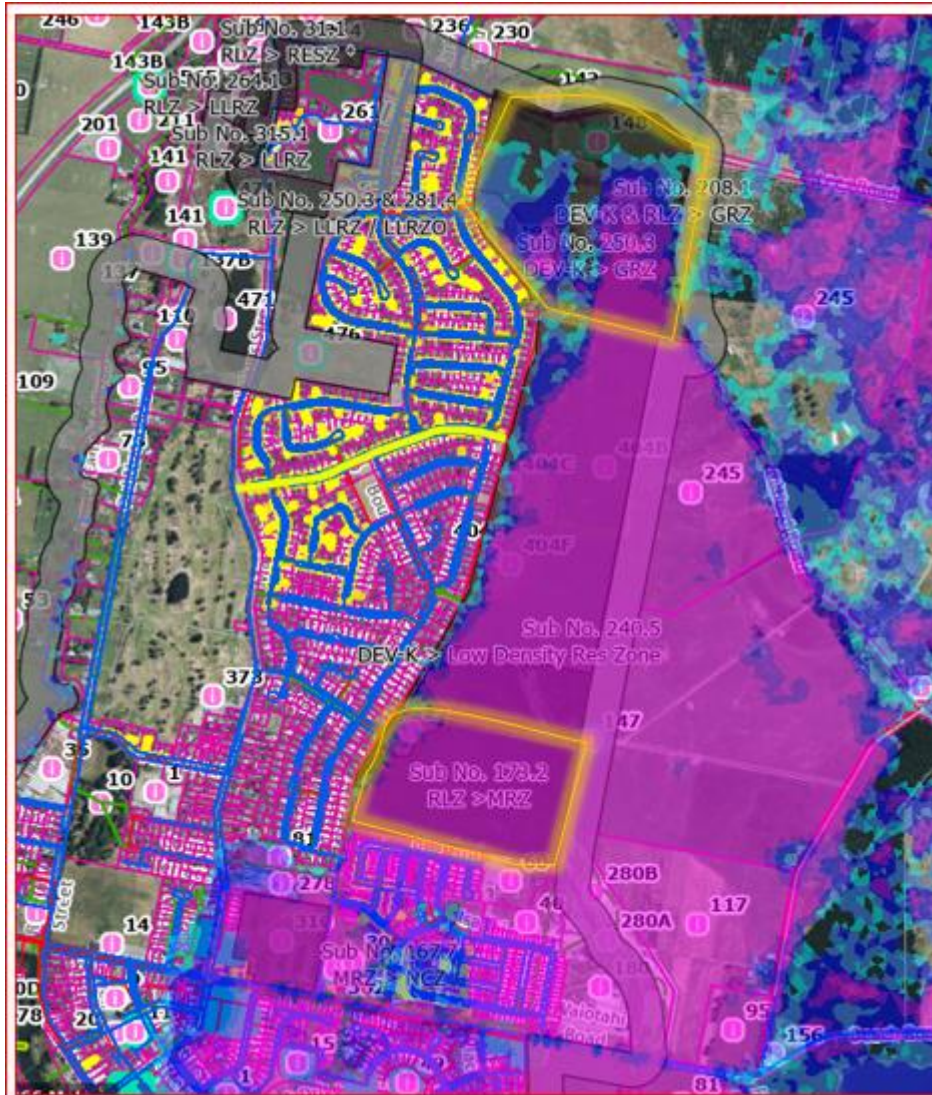
213. The application sites addressed by s173 and s208 are located to the northeast of Kaiapoi.
214. Momentum's site (submission 173) is located immediately north of Beach Grove where the Submitter seeks rezoning to MDRZ.
215. Suburban Estates' site (submission 208) is located immediately east of Sovereign Palms where the Submitter seeks rezoning to GRZ.

Natural hazards

216. The site of s173, just north of Beach Grove, has a very shallow depth to groundwater, a medium flood hazard in both the Localised Flooding Hazard 200yr and Breakout Flooding Hazard 200yr scenarios, but a high hazard in the Coastal Flooding Hazard 200yr scenario, a high risk of liquefaction, and a risk of subsidence due to consolidation of the soft alluvial soils that underlie the site.
217. The site of s208, just east of Sovereign Palms, is located to the north of s173. The ground levels across the s208 area must be slightly higher than those across s173, which is reflected in the very low to low flood hazard at the south and east parts of the s208 area in both the Localised Flooding Hazard 200yr and Breakout Flooding Hazard 200yr scenarios. In the Coastal Flooding Hazard 200yr scenario there is a large area of medium to high flood hazard across the mid and south parts of the site.
218. I was unable to find any technical reports from the Submitter (Suburban Estates) to support their submission s208. I therefore have drawn on information from previous geotechnical reporting held on WDC's records for the Sovereign Lakes development that is located immediately west of the site. Coffey's June 2012 geotechnical report (for the Sovereign Lakes development) indicates the Sovereign Lakes site is generally underlain by sands and gravelly sands, with groundwater located between 1-2m bgl. The site did not have a significant risk of liquefaction in either an SLS or ULS earthquake, but there were areas of moderate risk of liquefaction that resulted in a possible risk of lateral

spreading occurring in the area of the stormwater basins, that are located approximately southwest of the s208 area.

219. Both s173 and s208 sites are within an area where the modelled flood depth exceeds 1m in a 200yr Coastal Inundation event. All the s173 site but only a small part of the s208 site, exceeds 1m depth. Refer the areas of s173 and s208 highlighted on the following excerpt from the 200yr 2020 Coastal Inundation flooding map;



- 220.
221. Both s173 and s208 are in the 'orange' part of ECan's tsunami evacuation area, prepared for civil defence purposes. Environment Canterbury note "The orange zone is less likely to be affected by a tsunami and includes low-lying coastal areas that are likely to be flooded in a large tsunami that inundates land".
222. In relation to s173, Richard Brunton of Tonkin & Taylor (T&T) has modelled the hydraulic effects of the filling earthworks and concluded the risk of inundation to the new development can be avoided by filling the site to an appropriate level. The effects of the proposed filling on other existing properties was assessed by T&T as less than minor as the increase in flood water depth was modelled to be <35mm in a 50yr and 50~70mm in a 200yr event with no additional buildings inundated as a result of the development. The depth of flooding was, however, shown to increase. T&T adopted 1m SLR for RCP8.5 (as per the MfE's 2022 guidelines).
223. Richard Brunton's evidence addresses the minimum freeboard required by the NZBC, and assesses whether the increased flood depth will result in the freeboard no longer satisfying the NZBC. Of the 29 properties identifies in Table A2 of Mr Brunton's evidence, the dwellings at 258, 260 and 286 Williams St, 322 and 324 Beach Rd, and 117 Ferry Rd

currently do not meet the min.150mm or 500mm freeboard requirement of the NZBC. For these properties, T&T demonstrate how much the freeboard will reduce as a result of the proposed development.

224. In the case of the existing dwellings at 322 and 324 Beach Rd, T&T calculate the NZBC compliant freeboard should be 150mm, but calculate the existing freeboard is only 94 and 64 mm, respectively. Importantly, T&T calculate the freeboard would reduce as a result of the proposed subdivision construction to 67 and 37mm, respectively. This represents a 30~40% reduction in freeboard.
225. The other properties I listed above will experience a much smaller reduction in the existing freeboard, in the order of 5%.
226. I have not seen any technical reporting from Suburban Estates that investigates the effect of stormwater runoff from the s208 site to the surrounding area. Regardless, the nature of the land development works that will be required at s173 will be similar to that at s208. Given this, I expect the effect of any filling that will need to be carried out across s208 to mitigate the low-medium flood hazard will most likely have a similar minor increase in flood levels in northeast Kaiapoi.
227. Council is aware of the increase in predicted peak flood levels that T&T identify will arise from development of the s173 site. Assuming a similar effect will arise from development of the s208 site, it is possible the cumulative increase in flood height could be such that additional existing dwellings in Kaiapoi could be inundated. Council is aware that development of these areas is likely to occur over a number of years, during which it is reasonable to expect further modelling can be done to assess the cumulative risk, and where appropriate, to identify works that can be undertaken to mitigate or reduce the flood hazard.

Geotechnical matters

228. In relation to the existing ground conditions, T&T indicate that without ground improvement/earthworks, the s173 site would be TC3 (high risk of liquefaction). T&T proposed perimeter ground improvement to mitigate the risk of lateral spreading towards swales, and for placement of compacted fill with geogrid reinforcement, to reduce the risk of liquefaction-induced damage to shallow foundations. T&T also identify that preloading of the s173 site will be required to mitigate the risk of consolidation settlement. I agree that ground improvement and monitoring are common.
229. In relation to the s208 area, geotechnical conditions are likely to be better than those at s173. It is expected filling of the s208 site will be required to mitigate the risk of inundation and to achieve satisfactory conditions that can support shallow stiffened TC2 type foundations for future residential dwellings.

Stormwater

230. T&T have calculated the flood storage volume needed for attenuation of SW runoff, and assumed a wetland SWMA system will be provided for treatment of stormwater runoff. I agree that a wetland system is appropriate for treatment of stormwater runoff from the site.
231. A similar system is likely to be require for treatment and attenuation of SW runoff from the s208 site.

Wastewater

232. The submitter for the s173 site has demonstrated how to convey WW to the Council network, and there is provision in the LTP for WW capacity to service the proposed development. In summary, there are no known significant constraints that would prevent the proposed land use.
233. The ODP provided in the application for s208 identifies a wastewater pump station, and therefore, it is assumed it is intended that provide a gravity wastewater network draining to a pump station that discharges to a suitable location within the WDC network.

Potable water

234. There is provision in the LTP for capacity to service the proposed development at the south block (KAG08) in yr0-3 and the north block (KAG10) in yrs11-20. In summary, there are no known significant water supply constraints that would prevent the proposed land use.

Summary

235. Application site s173, and possibly s208, have a risk of subsidence from deposits of soft alluvial sediment, a moderate to high risk of liquefaction, and (for s173 site) a moderate to high flood hazard from both an Breakout Flooding Hazard 200yr event and from coastal inundation with a mean sea level of 1.0m. These hazards can be mitigated by ground improvement and filling of the site to a suitably high level.

Submission #332 (Mike Greer) – 144 & 170 Main North Rd, South Kaiapoi

236. The application site is located at the south end of Kaiapoi.
237. The flood hazard mapping suggests ground levels across the site fall from the northwest down to the south and southeast.
238. The site is bounded by Kaikainui Stream in the north, and Courtenay Stream in the south.

Natural hazards & Geotechnical matters

239. The west and central parts of the site have very low, low and medium flood hazards, while a comparatively small area along Courtenay and Kaikainui Streams as well as the east part of the site has a medium-high flood hazard in the Localised Flooding Hazard 200yr scenario.
240. WDC Flood modelling indicates that site has a very low flood hazard in the Breakout Flooding Hazard 200yr scenario.
241. Only the south boundary of the site, adjacent to Courtenay Stream, has a low-medium flood hazard in the Coastal Flooding Hazard 200yr scenario.
242. The south and southeast parts of the site were subject to liquefaction and lateral spreading in the September 2010 earthquake, with land spreading towards Courtenay Stream.
243. In general, the north and west parts of the site appear to be less susceptible to natural hazards.
244. ENGEO confirm that many parts of the site have a medium – high risk of liquefaction, and a compounding risk of consolidation settlement due to the presence of soft, saturated alluvial soils.
245. The DLS evidence confirms the site would need to be filled to avoid the risk of inundation in a 200yr event. While this seems a reasonable approach, it is likely to contribute to an increased risk of lateral stretch and consolidation settlement at the site that will require geotechnical mitigation.
246. The site is in the “orange” part of ECan’s tsunami evacuation area, prepared for civil defence purposes. Environment Canterbury note “The orange zone is less likely to be affected by a tsunami and includes low-lying coastal areas that are likely to be flooded in a large tsunami that inundates land”.

Stormwater

247. The Applicant has provided evidence by Gregory Whyte (Engineer, DHI) that explains how modelling by DHI confirms the proposed development will not increase the flood hazard to other property, with the exception of an 0.065m (i.e. 65mm) increase in flood depth along Main North Rd. Mr Whyte explains this could be reduced further by careful engineering design.

248. I agree that it is technically feasible to achieve onsite treatment, and to mitigate the risk of inundation for a future development by filling to raise ground levels across the site, but the volume of any stormwater management area that is needed to attenuate peak flows, and the rate at which treated stormwater can be discharged to Courtenay and/or Kaikainui Streams, will need to be confirmed at time of subdivision consent.

Wastewater

249. There is provision in the LTP for capacity to service the proposed development (KAG22) in yrs21-30 associated with the South of Kaikainui Supply Main Stage 2 works, forecast for yr 2052. Submitter identifies solution to construct developer-funded rising main to Parkham St pump station to service the site. There is sufficient capacity within the Kaiapoi WWTP for the proposed in summary, there are no known significant wastewater constraints that would prevent the proposed land use.

Potable water

250. There is provision in the LTP for capacity to service the proposed development (KAG22) in yrs21-30, associated with the South of Kaikainui Supply Main Stage 2 works.
251. In summary, there are no known significant water supply constraints that would prevent the proposed land use.

Summary

252. There is a risk of subsidence due to the presence of soft alluvial sediments, a high risk of liquefaction and lateral spreading from earthquake shaking, and an area of high flood hazard from a Localised Flooding Hazard 200yr scenario which needs to be managed. There are technical solutions that can be used to overcome each of these hazards, such as by placing controlled, compacted fill and ground improvement, and careful hydraulic design and onsite attenuation of stormwater runoff.

Submission #239 (Williams Waimak Ltd) – 12 Williams St, Kaiapoi

253. The site is located on the southeast part of Kaiapoi. Ground levels across the site appear to be slightly lower than surrounding land. The site is zoned MDRZ.

Natural hazards & Geotechnical matters

254. The submitter has not provided any supporting technical evidence. However, I note Kaikainui Stream is located just south east of the site. Extensive liquefaction was mapped to east of site after the September 2010 earthquake, suggesting there is most likely a moderate to high risk of Liquefaction occurring at the site.
255. Flood hazard modelling on WDC's GIS indicates that in the Localised Flooding Hazard 200yr scenario the site has a medium flood hazard, but the adjacent land all around has only a very low flood hazard - indicating ground levels across the application site are lower than surrounding land. The hazard from the Localised Flooding Hazard 200yr scenario could be eliminated by filling of the site to a satisfactory level.
256. The site has a very low flood hazard in both the Breakout Flooding Hazard 200yr and the Coastal Flooding Hazard 200yr scenarios.
257. The site is in the 'yellow' part of ECan's tsunami evacuation area, prepared for civil defence purposes. Yellow zones are areas least likely to be affected by a tsunami. They could potentially be flooded in a very large tsunami coming from across the Pacific Ocean.
258. While there is likely to be a medium, and possibly a high, risk of liquefaction, there are ground improvement and foundation design options that can be implemented to reduce or mitigate the risk posed by liquefaction.
259. In summary, there are no known significant geotechnical matters that would prevent the proposed land use.

Stormwater

260. WDC agree that it is technically feasible to achieve onsite treatment of stormwater runoff, but the volume needed to attenuate peak flows and the rate at which treated stormwater that can be discharged to Courtenay and Kaikainui Streams can only be determined from hydraulic modelling. The site is challenging due to high groundwater levels, and I understand the submitter has previously contacted Council to discuss whether there is an offsite stormwater attenuation solution which could work to support development of this site. Logistically there are challenges relating to capacity of the Kaikainui stream and localised flooding issues associated with the Kaikainui breaking out. This detailed design work could be carried out in support of an application for subdivision consent, but to date I understand it has proved challenging to find a solution which meets the developer's timeframes and Council's LTP.

Wastewater

261. There are existing sewers present in nearby roads, and WDC have made provision in the 50yr growth forecast to upgrade capacity with a 160PE rising main to service South Kaiapoi. In summary, wastewater services can be achieved to the site. In summary, there are no known significant wastewater constraints that would prevent the proposed land use.

Potable water

262. There is an existing 200 dia main that crosses the site, and WDC have made provision to upgrade supply to South Kaiapoi with a 200 dia main along Williams St as part of the 50yr growth plan. In summary, there are no known significant water supply constraints that would prevent the proposed land use.

Summary

263. There is a likely to be a risk of subsidence due to a medium to high risk of liquefaction, and possibly a risk of lateral spreading towards Kaikainui Stream from earthquake shaking (albeit that there are technical solutions that can be used to overcome each of these hazards, such as by placing controlled, compacted fill and ground improvement).

Submission #31 & 261 – Kaiapoi Lakes (likely to be 236 and 264 Lees Rd, and south of Lees Road)

264. The application site is reported to be located west of Sovereign Palms and east of Williams St.

265. The submitter has not provided any technical evidence, nor an ODP, nor an address or map to locate the properties at which relief is sought. Regardless, I comment on information that is known or available to me.

266. My review of aerial photography indicates there is an area of rural land to the east of Williams St, and north of Lees Road. The address of these two sites is 236 and 264 Lees Rd. There are several properties around a lake to the south of Lees Road, with addresses from 261 Lees Road round to 548 Williams Street. I assume these are the areas to which s31 & 261 relates to where residential zoning has been sought.

Natural hazards & Geotechnical matters

267. The site has a very low to low flood hazard in each the Localised Flooding Hazard 200yr scenario.

268. The site has a very low flood hazard in both the Breakout Flooding Hazard 200yr and the Coastal Flooding Hazard 200yr scenarios.

269. I am aware that the area that is immediately east and west of Williams St, and south and north of Lees Rd contains several former sand and gravel pits that are now lakes. This confirms the area is most likely to be underlain sand or sandy gravels.

270. Further, the Coffey geotechnical report carried out for the Sovereign Lakes development, southeast of the site, identified the presence of medium dense to dense sand and gravelly sands, with groundwater typically between 1-2m bgl, and typically with a low risk of liquefaction. However, Coffey did identify there was a moderate risk of liquefaction, particularly to areas adjacent to the lakes and new swales/basins.
271. Ground level contours recorded on the WDC GIS indicate the water level of the lake that is north of the site is around 1m RL, and ground levels across 236 and 264 Lees Rd are around 4~5mRL. This implies groundwater is likely to be present around 3m bgl.
272. Taking the topography and flood risk into account, I consider the area to the east of Williams St and north of Lees Rd can be developed in a manner that avoids or mitigates the risk of natural hazards (specifically inundation).
273. Detailed geotechnical investigation will be required to support any application for subdivision consent. The investigation should identify any risk of liquefaction and lateral spreading, and whether any additional measures will be needed to eliminate or reduce the risk of liquefaction and lateral spreading, along with any other significant risks from natural hazards (if present).
274. Given this I consider the addresses I have listed above are not likely to be subject to any significant natural hazard or geotechnical conditions that cannot be addressed as a condition of subdivision consent. Stormwater
275. Given the nature of the geology (sand or sandy gravel), and the likely 3m depth to groundwater, it may be possible to dispose of treated stormwater into ground. In summary, there are unlikely to be significant stormwater constraints that would prevent the proposed land use.

Wastewater

276. Servicing is achievable. It can be done, but there is cost associated the submitter/developer will need to meet. In summary, there are no known significant wastewater constraints that would prevent the proposed land use.

Potable water

277. Servicing is achievable. It can be done, but there is cost associated the submitter/developer will need to meet. In summary, there are no known significant wastewater constraints that would prevent the proposed land use.

Summary

278. There are no significant constraints that relate to natural hazards or the ability to provide stormwater, wastewater and potable water services to the site that would prevent the proposed GRZ/MDRZ land use. The sites do need geotechnical investigations, particularly those located around the lakes, to confirm suitability to support increased residential density.

Submission #121 & 367 – 261 Giles Rd, Clarkville

279. The application site is located just southwest of the existing Silverstream subdivision.

Natural hazards & Geotechnical matters

280. The site has a medium flood hazard in the Localised Flooding Hazard 200yr scenario. There is an area of high flood hazard along the west boundary of the site, along the stream that drains down to the north. The site is not subject to inundation in an Ashley Breakout event.
281. The site has a very low flood hazard in both the Breakout Flooding Hazard 200yr and the Coastal Flooding Hazard 200yr scenarios.

282. Filling of site could mitigate the medium flood hazard, however, consideration will need to be given to the effect of loss of flood storage volume. This will need to be assessed at time of application for subdivision consent, and where appropriate addressed as part of detailed engineering design.
283. Unknown liquefaction hazard, but given the location of the Silverstream subdivision immediately north of the site, it seems likely that the site could be made geotechnically suitable for the proposed land use.

Stormwater

284. Technical advice not requested.

Wastewater

285. Technical advice not requested.

Potable water

286. Technical advice not requested.

Summary

287. In summary, it is my opinion that there are no significant constraints that relate to natural hazards or geotechnical conditions.

Submission #181 (Fred Coughlan for the North Rangiora Owners Group)

288. The application site is located at the northwest part of Rangiora along West Belt, just east of the Racecourse. There is an alluvial channel that flows from the southwest down to the northeast that crosses the mid-part of the site.
289. The site appears to comprise several adjacent private properties.
290. No ODP has been provided, nor any geotechnical or natural hazard investigation.

Natural Hazards

291. The Localised Flooding Hazard 200yr and the Breakout Flooding Hazard 200yr scenarios indicate the south half of the site is almost entirely within a zone of very low flood hazard, except for a narrow area of medium flood hazard along the alluvial channel that is to the west of West Belt road, which becomes a high flood hazard within the same alluvial channel but to the east of West Belt. The north half of the site has a low and medium flood hazard in both scenarios.
292. There are no active faults, nor significant risk from liquefaction, nor likely deposits of peat.
293. In summary, there are no significant risks from natural hazards that would prevent the proposed land use.

Geotechnical Matters

The site is in an area where, based on existing nearby land, gravels are expected to be present at shallow depth. Given this subsidence and liquefaction are not likely hazards. In summary, there are no known significant natural hazard or geotechnical matters that would prevent the proposed land use.

Stormwater

294. Note there is an ECan Drinking Water Protection Zone (DWPZ) that covers the whole of the site, which is an area within which risks to a drinking water supply intake from contaminant sources are identified and appropriately managed. Any proposed discharge of stormwater will require Resource Consent from ECan.
295. Submitter should provide an ODP that identifies conceptual locations and areas needed for SW treatment, flood conveyance, and attenuation. A SWMA will ideally need to be located at the lower northeast part of the site. It is expected that roof water and treated

surface stormwater will most likely be discharged into ground. Where discharge to the alluvial channel is required, it is possible onsite attenuation may be needed to mitigate the effects to downstream properties. This assessment can be undertaken at time of application for subdivision consent.

296. In summary, there are no known significant stormwater constraints that would prevent the proposed land use.

Wastewater

297. Whilst there may be some minor constraints, there will be engineering solutions that will allow this area to be serviced, most likely by discharging into the existing Arlington wastewater network. In summary, there are no known significant wastewater constraints that would prevent the proposed land use.

Potable water

298. There is piped reticulated water supply nearby, and a water main crosses the site. This will most likely need to be relocated as part of development.
299. In summary, there are no known significant water supply constraints that would prevent the proposed land use.

Summary

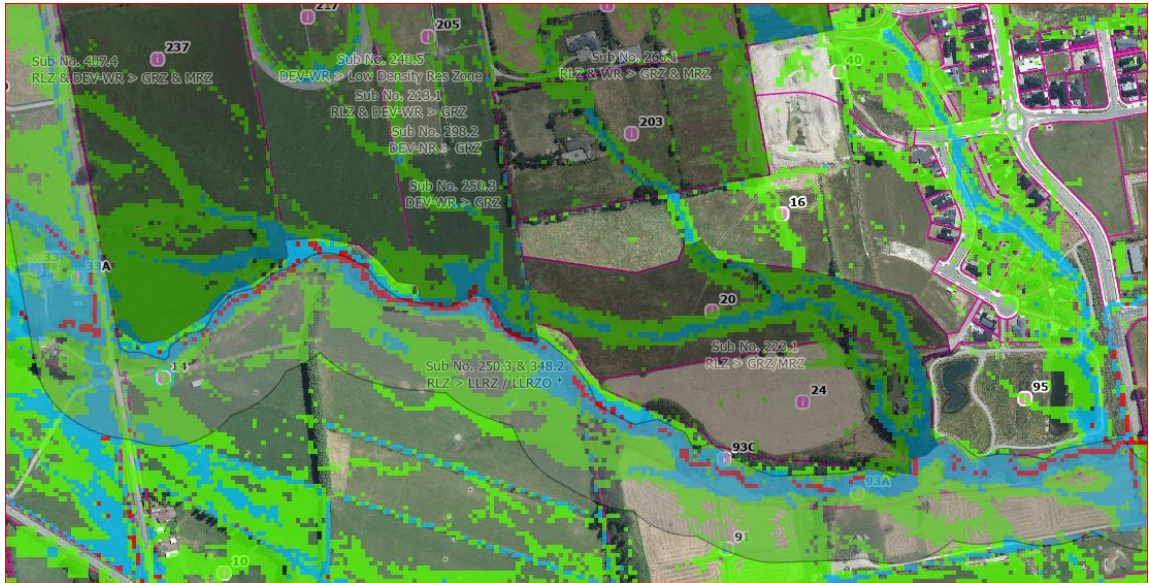
300. There are no significant constraints that relate to natural hazards, geotechnical conditions, or the ability to provide stormwater, wastewater and potable water services to the site that would prevent the proposed GRZ/MDRZ land use.

Submissions 223.1 and 223.14 (Broughton), s.266.1 (199 Johns Road Ltd and others), s.297.1 (Skelley), s.340.1 (Paterson), s407.4 (Schluter)

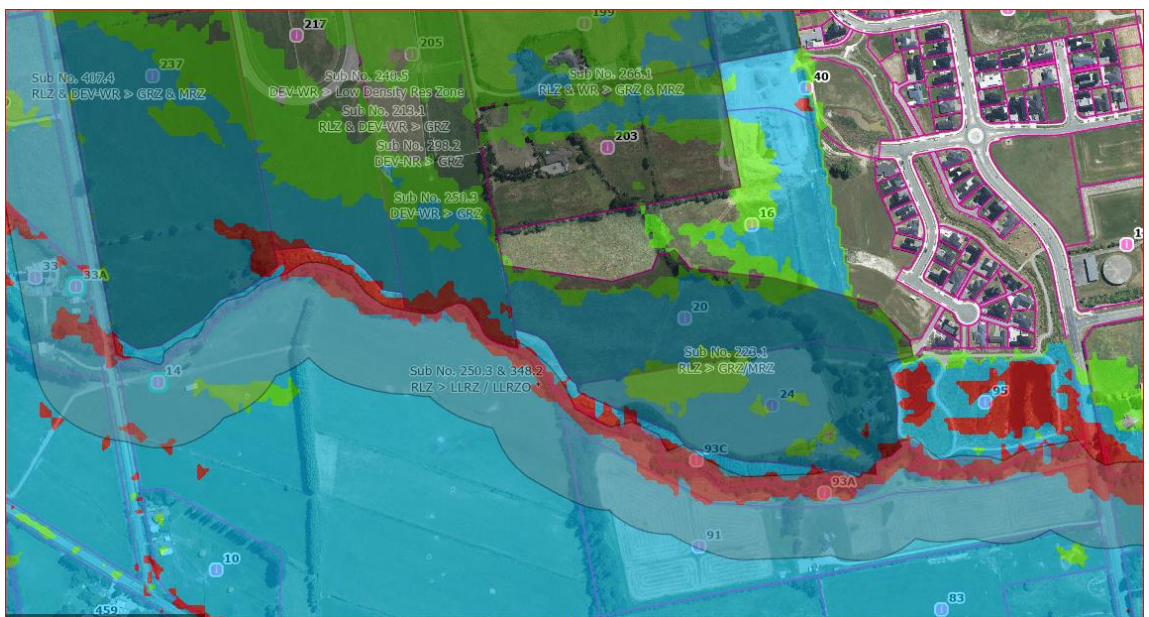
301. All submissions listed above relate to the West Rangiora Outline Development Plan included in the PDP.
- a) Submission 223 for Broughton by Aston Consultants relates to the 8.4Ha site at the southern end of the ODP, formerly 117 and 113 Townsend Road (now 20 and 24 Angus Place). These two sites form the southeastern part of the West Rangiora ODP area. The submission seeks rezoning to GRZ and MDRZ. The submission discusses natural hazards and attaches an assessment of stormwater management and flood risk from Reeftide. A small additional SMA to the west of the existing Townsend Fields SMA is proposed in the southeast corner on the amended ODP included in the submission.
 - b) Submission 266 for by Eliot Sinclair relates to the sites at 163, 191, 199 and 203 Johns Road, seeking rezoning to GRZ and MDRZ. These sites border Townsend Fields development to the east and south, and Johns Road to the north. The submission proposes a new South-West Rangiora ODP for the site. The proposed SW Rangiora ODP does not extend as far south as 20 and 24 Angus Place, which is subject to submission 223. The submission proposes a new SMA area, to the west of the ODP and outside the ODP area. Appendix C of the submission includes an Infrastructure Services Report from Eliot Sinclair.
 - c) Submission 297 supports rezoning to residential zone south of Johns Road, and does not attach further information in support of the submission.
 - d) Submission 340 relates to the certification process, and does not raise engineering matters.
 - e) Submission 407 relates to 237 Johns Road, and is supportive of the proposed GRZ zoning for the site shown in the West Rangiora ODP. The submission raises concerns with the certification process, and does not put forward information regarding servicing etc.

Natural Hazards

- 302. The southern part of the ODP site is susceptible to flooding.
- 303. Modelling indicates there are relatively narrow areas of low to medium flood hazard that are largely confined to various alluvial depressions and shallow stream channels in a 200yr local flood event. Refer below;



- 304.
- 305. Importantly, the extent of the flood hazard increases substantially to a medium to high flood hazard in the Breakout Flooding Hazard 200yr scenario, with approximately half of 237 Johns R (s407) and virtually all of 20/24 Angus PI (s233) modelled to have a medium flood hazard. Only the far south part of 205 and 217 Johns Rd have a medium flood hazard, with the main mid and north parts of these two sites having a low to very low flood hazard in the Breakout scenario. Refer below:



- 306. Submissions 223 and 266 propose mitigating the risk of the Ashley River breakout by constructing an earth bund in an area to the west and south of the ODP.
- 307. Submission 223 does not provide any evidence of the potential effects of the proposed earth bund that would be needed to enable a residential development of 20/24 Angus Place.
- 308. Submission 266, appendix C (Eliot Sinclair assessment) identifies in s4 of their report that a bund and channel solution to the west of their proposed development area was

demonstrated to work well through flood modelling completed by Fluent Solutions. The configuration conveys flows to the south and increased flood depth in the southern most areas of 205 Johns Road (to the west and outside the ODP area), and 117 Townsend Road (now 20 Angus Place). 117 Townsend Road is subject to submission 223, seeking MDRZ and GRZ. The Eliot Sinclair report notes the area is pasture, but should this be rezoned as proposed it would not be acceptable for flood effects to be caused here.

309. Submission 407 in support of GRZ at 237 Johns Road supports the proposed zoning. I note there is medium hazard flooding shown in the Breakout Flooding Hazard 200 year model across the southern part of the site, so it is likely this area would need to largely be stormwater management areas.
310. Submitter 407 has not provided any evidence to demonstrate the potential effect of an earth bund along the full length of the western boundary of the site, however, in my opinion it is quite likely an earth as described would be very likely to increase the flood hazard to other property to the south, and possibly upstream to the west of the site.
311. I note the south half of 237 Johns Rd (s407) and all of 20/24 Angus PI (s233) is modelled to have a medium flood hazard in the Breakout Flooding 2020 scenario. Importantly, these areas are located within the main South Brook flow channel, where a breakout of the Ashley River is modelled to flow.
312. Mr C. Bacon has explained to me how the earth bund that was constructed to the west of Townsend Fields redirected only a minor secondary flow channel, not the main flow channel associated with South Brook.
313. Mr Bacon is concerned that any filling work, or attempt to divert the main South Brook flow channel would increase the flood hazard to surrounding property. I agree that any filling works within the main flow channel are likely to increase the flood hazard on adjacent property.
314. Given an earth bund and site filling would be needed to protect the south half of 237 Johns Rd (s407) and all of 20/24 Angus PI (s233), and the south parts of 205 and 217 Johns Rd, and the construction of a bund and filling within the main South Brook channel is likely to result in an increased flood hazard to other property, it is unlikely that these areas (i.e. the southern parts of the West Rangiora Outline Development Plan area) can be used for residential land use, however, the land could be used for stormwater management purposes.

Geotechnical Matters

315. The PDP planning maps identify the site as "liquefaction damage is unlikely".
316. As noted above in relation to submission 242 (Dalkeith Holdings), my experience is that the southwest/west parts of Rangiora may be underlain by slightly reactive clayey silts, i.e. soils that can tend to shrink or swell due to a decrease or increase in soil moisture. However, it is also my experience that these soil conditions can be mitigated by appropriate engineering design and construction of pavements and building foundations.
317. In summary, there are no known significant geotechnical matters that would prevent the proposed land use.

Stormwater

318. Groundwater resurgence is not a known hazard in this area. It is noted groundwater levels in this area do fluctuate (as identified in the Elliot Sinclair report appendix C submission 266) and need to be allowed for in civil infrastructure design. The shallowest reading report is 0.2m bgl, and deepest is 3.8m bgl.
319. As noted above the southern area of the West Rangiora ODP is subject to the worst of the breakout flooding, where there is a large area of medium flood hazard. Submitter 223, who owns the land in this area (20 and 24 Angus Place), has included an assessment of stormwater but this has not considered the impact of the earth bund on surrounding

property. Regardless, submitted 223 identifies additional stormwater management will be required for the site, as the existing Townsend Fields SMA does not have capacity to service the area.

320. Submission 266 (163,191,199 and 203 Johns Road) confirms the Townsend Fields SMA was designed and constructed to provide attenuation and treatment for a 50ha upstream catchment, which includes these land parcels. However, as noted in the submission the design assumed these areas would develop to a Residential 2 standard. Residential 2 has minimum lot sizes of 600m². If smaller lots, higher density and higher impermeable site coverage is permitted, this SMA may not have capacity for the additional stormwater run-off from these areas.
321. Elliot Sinclair in Appendix C of submission 266 identify this, and conclude a new SMA would be required to detain the additional runoff, which would be released to the existing Townsend Fields SMA area for treatment. This is feasible and detailed design would be required at subdivision consent stage.
322. Overall, there are feasible stormwater management options available for the ODP area, and the details of these can be confirmed at time of subdivision design. The main issue that will need to be addressed is the large area of medium-high flood hazard in the 200yr breakout scenario, as these are unlikely to be suitable for residential development.

Wastewater

323. Site is within RGA26 growth area. Council has previously put together a proposed servicing plan for the West Rangiora Development area. The ODP anticipates servicing of this area. A temporary solution may be needed if development occurs in the north before the south (refer to Trim 231206196569).
324. WDC Water and Wastewater 50yr scheme upgrade report identifies need for WDC to provide West Rangiora Gravity Upgrade 2 in due course to service western Rangiora developments. In summary, ultimately there are no significant wastewater constraints that would prevent the proposed land use.

Potable water

325. As with Wastewater, Council has previously put together a proposed servicing plan for the West Rangiora Development area. WDC's 50yr water & wastewater scheme upgrade report, trim 231206196569, identifies future provision of the Johns Rd supply main 1 and the Lehman's Rd ring main. WDC's network has allowed for capacity to service this site. In summary, there are no water supply constraints that would prevent the proposed land use.

Summary

326. There are no significant constraints that relate to geotechnical conditions, water or wastewater servicing.
327. However, the southern portion of the site is subject to a medium-high flood hazard in the Breakout Flooding Hazard 200 year scenario. It is unlikely the area of medium-high flood hazard can be remedied within the applicant's site, due to the likelihood that construction of an earth bund and/or filling within the main South Brook channel would result in an increased flood hazard to adjacent property
328. It is noted for the record that additional stormwater management areas may be required to service the areas covered by submissions 199 and 223, which could be added to the ODP, noting the limitations on areas that can be developed for residential land use.

WAIMAKARIRI DISTRICT COUNCIL

MEMO

FILE NO AND TRIM NO: DDS-14-13-03 / 240522082326

DATE: 15 July 2024

MEMO TO: Peter Wilson, Principal Policy Planner

FROM: Shane Binder, Senior Transportation Engineer

SUBJECT: Stream 12E - Transport Advice

Submission 213 – 70 Oxford Road

Note these comments cover both 70 Oxford Rd (submission 213) and Brick Kiln Ln (submission 319) grouped together in one site.

- I consider it critical to implement an ODP for this area to manage infrastructure development over the individual lots that make up the entire site (including 70 Oxford Rd), which may be intensified at different times, and do not all have direct road access to Oxford Rd. I also note the operative West Rangiora structure plan does not include any provision for a transport network north of Oxford Rd so I do not consider it fit for purpose if this site is to support intensified development.
- As discussed elsewhere, I would also recommend that the overall pattern of development seek to minimise sections without road frontages (e.g., sections that access public roads through narrow ROWs or long driveways) given the safety and operational effects of those accesses.
- In order to preserve the operational priority of a Strategic Road and minimise safety risks from turning traffic, I do not support creation of any additional accesses onto Oxford Rd and would further support access consolidation and elimination, especially in light of the potential to substantially increase traffic using these accesses if the site is intensified.
- The Proposed District Plan allows for 125m spacing between road intersections on Strategic Roads, which would allow for up to two new intersections. However, I note TRAN-P4 ("New Activities") directs access to be provided to frontages with the lowest available classification roads. I note the site has frontages on Charles Upham Drive and Westpark Blvd (through a Council stormwater pond), both of which are classified lower than the Strategic Oxford Road. I also note the presence of on-street cycle lanes on Oxford Road and would seek to minimise new conflict points. I would consider primary vehicular access to the site from these two frontages to be a far better and safer outcome for the network and future residents than a new road intersection(s) on Oxford Road.
- With respect to 70 Oxford Road specifically, I note an active resource consent exists under the operative District Plan for residential intensification. I consider it to be a safer and operationally superior outcome for development on this section to be coordinated with the rest of the Brick Kiln Lane site, including consolidating any public road access from Oxford Rd to one intersection.
- I also consider it important that if any or all of these sites are to develop with intensified residential development, that they be interconnected with the existing roading network on all sides (e.g., not just to Oxford Road) and interconnected with existing footpaths and cycling facilities.

Submission 247 – Dalkeith – West Rangiora

- This is within the existing future urban development area (FUDA) so I have reserved my additional comments only to scope beyond original analysis.

- I consider that the medium density areas explicitly noted in the West Rangiora ODP are important to maintain as this density needs to be concentrated along a “primary road” in order to best create the demand for future public transport (PT) service and walking and cycling facilities. Dispersed medium density development is not as efficient to service with new walking, cycling, or PT networks.

Submission 246 – Hales – West Rangiora

- This is within the existing future urban development area (FUDA) so I have reserved my additional comments only to scope beyond original analysis.
- I note that while the existing roading network would provide service for private motor vehicles generated by ad hoc development, I consider there is no appropriate walking or cycling infrastructure to connect ad hoc development to the existing walking/cycling network. By definition, this also applies to PT access, as new PT service is unlikely to occur for limited ad hoc development.
- I also consider that the medium density areas explicitly noted in the operative ODP are important to maintain as this density needs to be concentrated along a “primary road” in order to best create the demand for future PT service and walking and cycling facilities. Dispersed medium density development is not as efficient to service with new walking, cycling, or PT networks.

West Rangiora Development Area – 20-24 Angus Place

- I have reviewed the existing and future transport provision around 20 and 24 Angus Place (sections subdivided as part of the Townsend Fields development) as well as the South West Rangiora ODP. The ODP is excerpted below:

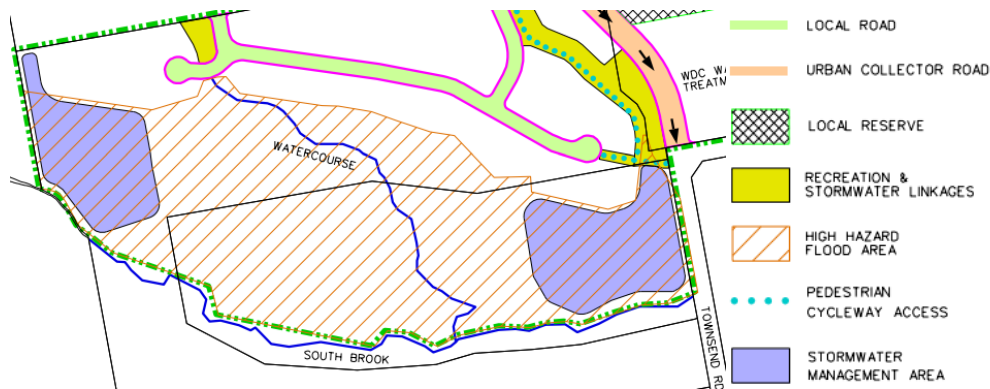


Figure 1: South West Rangiora ODP (excerpt)

- I note the land in 20 and 24 Angus Place was designated a “high hazard area” and the associated local road network was laid out without access across the tributary of the South Brook. I understand the master plan for Townsend Fields (last updated in 2021) generally adheres to the ODP roading network in this area, i.e., access across the tributary is chiefly cut off by residential sections, as shown on the next page.



Figure 2: Townsend Fields master plan, 2021 (excerpt)

- I also note that the land to the south of the South Brook is zoned Rural and lays outside Rangiora's Infrastructure Boundary. I consider that the land south of the South Brook tributary is not well-connected with the Townsend Fields development and will not likely be connected to any development to the south. As such, I consider intensified residential development in this area to be a poor outcome from a transportation perspective.

Bellgrove

- I strongly encourage that placement of higher-density MRZ take into consideration the need and benefit of close proximity to public transport and regional cycling links. In this instance, Kippenberger Ave will likely have the only PT service and Grade 1 (highest level) cycleway in the ODP area. Higher density development in close proximity to PT and cycle facilities both increases the number of households that can realistically take advantage of these modes as well as creating higher demand for them.
- I strongly encourage a secondary road network that maximises number of sections with direct road frontage and minimises long driveways and ROW-based development.
- The ODP needs to include cycle facilities along both Northbrook Rd & Kippenberger Ave frontages to give effect to the Walking & Cycling Network Plan.
- The proposed ODP is missing an extension of the existing connection off Goodwin St (between #24 & 26)
- I would recommend against the proposed 4-way intersection at Devlin & Cassino or as shown with the internal secondary roads. 4-way crossroads are not recommended due to the higher number of conflicts between turning vehicles.
- I acknowledge that the existing structure plan shows a primary road corridor extending south from Devlin Ave to Boys Rd, crossing Northbrook Rd at its present 30-degree bend. The likely resulting intersection geometry and compromised sight-lines are such that I strongly recommend that a roundabout be constructed at this location.

West side of Golf Links Rd (#8 to 59)

- I note the Golf Links Rd frontage will require substantial urbanisation, likely to include a shared use path to give effect to the Walking & Cycling Network Plan.
- The intersection with Rangiora-Woodend Rd and Kippenberger may continue to operate within acceptable vehicular levels of service (although I have not undertaken a quantitative assessment to validate this). However, I consider it will likely require improvements to improve safety (given the presently high inbound speeds on Rangiora-Woodend Rd, the angled approach geometry, and sight-line constraints) and walking/cycling connections to the Rangiora-Woodend Path. These improvements could range from a series of raised islands to a roundabout.
- Should these properties develop, it would be best to minimise the number of access points onto Golf Links Rd, given its relatively higher speed environment, and channelise most new traffic west through future Bellgrove development and east through limited road

intersections to Golf Links Rd. This east-west connectivity should be included in future planning at Bellgrove.

Submission 179 - Hobson & Whimp - 4 Golf Links & 512 Rangiora Woodend Rd

- This site is located adjacent to existing bus, walking/cycling, and vehicular routes on Rangiora-Woodend Rd so is thus well served by all modes. I do note it is some distance (2.5km) to the town centre and (3.0km) to nearby schools, but is still generally considered to be appropriate for non-car travel.
- At present Rangiora-Woodend Road is a high-speed rural road with sight distance limitations around the corner at Golf Links Road, so I would recommend that the existing property access (#518) be closed and no more than one new access be permitted to Rangiora-Woodend Road. I consider any access to side roads (e.g., through 4 Golf Links Rd or 6 Marchmont Rd) to have fewer traffic safety risks.
- I consider it important that should any development occur in this area, that future connectivity to the north and east be allowed for.

Submission 391 – Kelley – 479 Rangiora-Woodend Road

- I have reviewed the existing and future transport provision around 479 Rangiora-Woodend Road as well as the South East Rangiora Development Area. The Development Area is excerpted below:

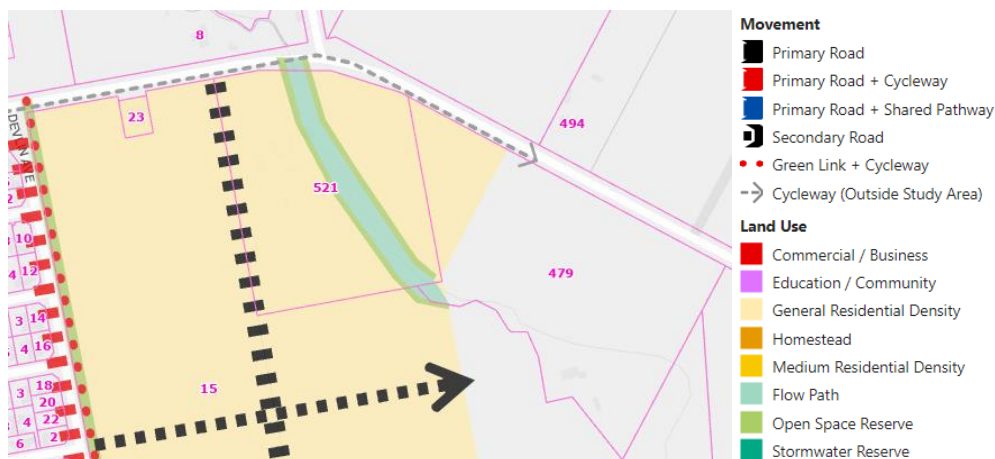


Figure 1: South East Rangiora Development Area (excerpt)

- As shown above, the Development Area plan did not envision any road crossing of the Cam River. I understand that an ODP for the land to the west proposed by Bellgrove South does not include any internal transport connections across the Cam River (to either #479 or 521). I also note that safe access to the portions of 479 and 521 Rangiora-Woodend Road will be challenging to achieve, given the limited sight distance around the corner at the Golf Links Road intersection and the relatively higher 80 km/h speed environment.
- I also note that the land to the south, east, and west of the site is zoned Rural and lays outside Rangiora’s Infrastructure Boundary. I consider that the land east of the Cam River is not well-connected with the South East Rangiora Development Area and will not likely be connected to any development to the south, east, or west. As such, I consider intensified residential development in this area to be a poor outcome from a transportation perspective. I would also recommend limiting, as much as practicable, any new access to Rangiora-Woodend Road that cannot be a safe distance away from both the corner and intersection at Golf Links Road.

Submission 125 - Fechney - Chinnerys Rd

- Given the intensification on all sides, I would generally support this location being included as GRZ.

- I note that Chinnerys Road will likely require road reserve widening and substantial urbanisation – footpaths, widening, kerb/channel, lighting, street trees – and this may be better organised on an area-wide basis rather than per section as each develops.
- I note that based on existing background traffic volumes on Chinnerys Road that the intersections with Rangiora-Woodend Rd and Main North Rd may require improvements in the future, and additional traffic from this area is likely to accelerate these improvements. However, this is not in and of itself a reason to decline this submission.

Submission 201 – Hack – Parsonage Road

- This site is served by one road only (Parsonage Rd) which has some operational constraints along its length to Main North Rd. As a result, improvements will be required to provide appropriate service for all modes - Stopforth St intersection improvements, continuous footpath, carriageway widening, utility relocation/undergrounding. However, in general I consider that Parsonage Road should be able to accommodate the traffic generated by this site.
- Development of this site will likely require more road reserve width (as has been proposed by the applicant) to achieve space required for an appropriate roading connection and termination (e.g., cul-de-sac)
- I would suggest that development in this area would be best served to extend to 100/107/115 Parsonage Rd, 112 Eders Rd, and 124 Gladstone Rd. I would also recommend preserving corridors for a future roading connection to Gladstone Rd and a future non-motorised trail connection to a potential cycle way along the Woodend Bypass.

Submission 214 – Stokes – Gressons Road

- From a transport servicing perspective, the proposed ODP has a good arrangement limiting access to/from SH1 but concentrating on via Gressons Rd and central Ravenswood area. Waka Kotahi is very sensitive to operational and safety impacts to the State Highway from additional accesses which the proposed ODP appears to limit.
- I consider that this area at present is not well served for walking, cycling, or PT, and has reasonable constraints on private motor vehicle service. However it is proximate to higher-service networks so will require some investment in connections to enable service in this area. I consider this to be entirely surmountable.
- I recommend not having a road access opposite the existing Macdonalds Lane intersection; four-way crossroads perform relatively less safely due to turning conflicts.
- I recommend cycleway connections be included in the ODP along the State Highway and Gressons Rd frontages.

Submission 215 - Woodwater - South of Woodend - RLZ pocket (incl. S 77)

- I consider this area to be appropriate for GRZ given the potential for connections to the existing transport connections. I am not sure that it would be sufficiently well connected for MDRZ intensification based on the following constraints (unless they are remedied)-
 - Judsons Rd, the only existing road servicing the bulk of the site, has a legal width far below District Plan requirements (10m) and is not sufficiently wide to provide appropriate access for substantial development
 - Judsons Rd also accesses only to Woodend Beach Rd, which has capacity constraints at the existing intersection with Main North Rd
 - There are very limited non-motorised connections (none on Judsons Rd and only far side footpath on Petries Rd) with the broader network (and existing PT stops and cycle facilities)
- If further development is to be allowed in this area, I strongly recommend creation of an ODP including further connections from Judsons Rd to Petries Rd and Copper Beech Rd as well as consideration of widening of the Judsons Rd legal road width.

Submission 332 – Mike Greer – South Kaiapoi

- I consider that this site is relatively well-served by public transport (bus service on Main North Road) and cycling/walking (Main North Rd path is across from the site).
- I note comments on other sites around future capacity constraints at the Tram Road interchange will apply in this instance, given what I understand as a relatively high likelihood of cumulative effects at the interchange from all new development served by Tram Road on both sides of the SH1 corridor. However at this time, I do not have a quantitative upper limit to the Tram Road motorway interchange.
- While the proposed development scheme shows a “recreation reserve” between the site and Main North Road, I consider that some degree of urbanisation of the frontage will still be necessary, potentially including a walking/cycling facility, crossing points, street lighting, street trees, and kerb/channel, and possibly widening of the road reserve.
- The southern access should be moved from where shown. Cross-roads intersections are not recommended due to the higher risk of conflicts from turning traffic so I would recommend two staggered t-intersections (from the paper road opposite)
- Research has established a pretty strong correlation between New Zealand’s high rate of driveway run-over paediatric fatalities and shared accesses with limited green space. This applies to the north-east and south-west corners of the development – Lots 16-20, 21-23, 25-33, and 180-186. In general I would not support ROW-based urban form, especially where the section sizes are so small.
- It is also worth noting that a ROW by definition poorly provides the functions of a road – on-street parking, street trees (with stormwater attenuation, pedestrian shading, heat island dissipation, and speed slowing effects), separated footpaths, street lighting, and sufficient sightlines – so properties that are accessed by ROWs receive a lower level of service.

Submission 239 - Williams Waimak Ltd

- I consider that this site is relatively well-served by public transport (bus service on Williams St) and cycling/walking (Main North Rd path is across Williams St from the site).
- I note there are two apparent connections to the site – Stone St and the primary access to Williams St. The end of Stone St has a 20m wide road reserve, which meets proposed District Plan requirements. The access to Williams St appears to be 15m wide and does not meet operative or proposed District Plan width requirements, which could impose some restrictions on the elements that could be included in a public road here.
- I also note that any connection to Williams St will be opposite but not aligned with Vickery St. This alignment is such that it is not possible for through traffic (i.e., Vickery to/from Blue Skies) to travel straight across Williams St but it also does not appear to be possible to meet the Austroads recommended minimum distance between staggered t-intersections (AGTM06, section 3.2.7). This arrangement does create a potential safety risk.

Submission 31 & 261 - Kaiapoi Lakes - West of Sovereign Palms

- In order to preserve the operational priority of a Strategic Road and minimise safety risks from turning traffic, I generally do not support creation of any additional accesses onto Williams St and would further support access consolidation.
- I note that The Lakes chiefly has privately-maintained ROWs and would counsel caution before additional subdividing is encouraged with access via private roads.
- I note that Lees Road will require substantial urbanisation - carriageway widening, footpath, kerb and channel, illumination, street trees, etc.

Submission 367 & 121 - 261 Giles Rd

- I note this appears similar to RC215675.

- I consider that this property has limited appropriate access for private motor vehicle and no appropriate access by any other modes (e.g., public transport, walking, or cycling) at present.
 - At present there is no access to Ohoka Road (the existing access is off Giles Road) and I would not support any new access to Ohoka Road, given that it is a high speed Arterial Road
 - Given the site is disconnected by Ohoka Road from the cycling and walking access in Silverstream, as well as PT service there, I consider it likely that future occupants of any residential use of this site will travel chiefly by private motor vehicle.

Submission 181 - North Rangiora Developments Ltd

- This site is located adjacent to existing bus service on River Road/West Belt so has reasonable public transport service (albeit not high frequency at present). I do note it is some distance (3.0km) to the town centre, but is still generally considered to be appropriate for travel by bicycle (although a bit far for the average walking trip). I also consider that West Belt, River Road, and downstream links have sufficient existing capacity to accommodate new private vehicle traffic generated by development under this submission
- River Road and West Belt are intended to have higher-quality cycling facilities as part of the Walking & Cycling Network Plan, but as yet, this area is not well served by appropriate cycling facilities.
- I would strongly urge an ODP be developed for this area, with several key elements considered:
 - Broader network connectivity, including to the new North West Arterial Road
 - Local road connections (given the existing block sizes are inappropriately large)
 - Pedestrian connectivity independent of vehicle links (e.g., through the top of any no-exit roads, along drains and other street-to-street connections)

WAIMAKARIRI DISTRICT COUNCIL

MEMO

FILE NO AND TRIM NO: DDS-14-13-02 / 240521081138

DATE: 15 July 2024

MEMO TO: Peter Wilson, Principal Policy Planner

FROM: Jon Read, Green Space & Community Facilities Planner

SUBJECT: Proposed District Plan Rezoning Requests
Stream 12E – Green Space

STREAM 12E EVIDENCE

Dalkeith and Hales Submissions (West Rangiora)

In the event of a zone change and future residential development of land subject to the Dalkeith and Hales submissions, the provision of Council neighbourhood park space will be triggered under the West Rangiora Outline Development Plan. To adequately meet Council levels of service, a 1.5-hectare green space is required. This area is needed to provide a community park space of 0.7 to 0.8 hectares; and a similar-sized area of additional green space for the future development of a Council community facilities hub. This hub is required to service long-term population growth in the West Rangiora area. Council currently owns the parcel of land envisaged to meet these public space provisions; 89 Oxford Rd (Pt RS 936 /4.11ha).

If residential density is similar to that of the adjacent Oxford Estates development, then the park space outlined will be adequate to service the Dalkeith and Hales submission areas; plus, any further residential development of land within the ODP area bordered by Johns, Lehmans and Oxford Roads. This is over and above any green linkages/walkways and stormwater management areas required.

Waimakariri District Council's level of service requirements for neighbourhood park access in urban and suburban areas is...Most residents to be within 500m, or a 10-minute walk, of a neighbourhood park; and 1.0ha of neighbourhood park space to be provided per 1,000 residents (approx. 420 dwellings).

The Acacia Reserve neighbourhood park within the adjacent Oxford Estates development does not have capacity to absorb any further residential development under Council's service provision guidelines. Ultimately, residents will move between the different areas at will. This is beneficial to wider community integration.

Sparks (East Rangiora)

The key greenspace level of service requirements for this ODP/Structure Plan area are neighbourhood parks, provision of full 20m esplanades (Southbrook Stream), and green (off road) recreation linkages. The location of the two parks north of Boys Rd is acceptable as indicatively shown on the ODP...with the primary (community- catchment) park being centrally located. If this site is zoned residential, the overall park provision needs to meet Council's key level of service requirements i.e. Most residents to be within 500m, or a 10-minute walk, of a

neighbourhood park; and 1.0ha of neighbourhood park space is to be provided per 1,000 residents. In addition, the minimum size for a neighbourhood park is 0.3ha. If rezoning and significant residential development is intended south of Boys Rd, this will trigger a requirement for a further neighbourhood park. The physical barrier of Boys Road requires this. This park will require well-drained and relatively flat land.

Bellgrove South

The proposed green linkages, cycleway and esplanade reserve provision in this proposed residential development area are advocated and supported by Council Greenspace. The indicative Open Space Reserve is appropriately located for wider community access. Ultimately, the size of this open space reserve (neighbourhood park) will need to comply with Council's Park Levels of Service guidelines. These state that most residents are to be within 500m, or a 10-minute walk, of a neighbourhood park; and 1.0ha of neighbourhood park space is to be provided per 1,000 residents (approx. 420 dwellings) The accessibility distance is fully achieved across the ODP area, but the size of the park space is to be determined.

West side of Golf Links Rd (#8 to 59)

In any residential development of this area, 20-metre-wide esplanade reserve provision is a District Plan requirement along both sides of the Cam River waterway. The Taranaki Stream corridor further to the north will also require adequate stream bank margins to facilitate drainage maintenance access, public access and ecological restoration. The likely population of this area, if zoned residential, will also trigger a requirement for a small neighbourhood park (minimum 0.3ha). If the site is developed by Bellgrove, this park could be considered in a wider provision context i.e. location could potentially be within or outside of the site as long as it meets community accessibility requirements for the intended catchment area.

Doncaster (North-West Rangiora)

In isolation, this submission proposal does not trigger a requirement for any additional neighbourhood park green space if rezoned General Residential. The site's transmission line margin is also not required for Council community green space. This has already been provided for within the existing Council-owned transmission corridor land immediately to the south-east. Being adjacent to the 'future road', this land will ultimately form part of a strategic community recreation linkage reserve (walkway-cycleway) running between Lehman's Road and West Belt.

70 Oxford Road

No public greenspace is required in association with this proposal. I have provided feedback to Council Project Development Unit staff on appropriate street frontage treatments and tree provision in lieu of a street tree requirement within their development frontage. In my view, this will help mitigate visual impacts of the proposed medium density residential development.

Hack (100 Parsonage Rd)

There are no public greenspace provision requirements in relation to this submission. The retention and protection of any listed Notable Trees is required in the event of a zoning change and residential subdivision. Should rezoning occur, it is advocated that significant trees be retained where feasible to offset the inevitable change from rural to residential character.

Woodwater (110 Parsonage Road)

The provision of one or two neighbourhood park spaces will be required if this large area is rezoned and developed for General Residential living; with a portion potentially being rezoned as Large Lot Residential land. The number and location of these parks will need to meet

required park levels of service standards. i.e. most residents to be within 500m, or a 10-minute walk, of a neighbourhood park; and 1.0ha of neighbourhood park space to be provided per 1,000 residents. In addition, the minimum size for a neighbourhood park is 0.3ha. Depending on the intensity of development and associated population, meeting this provision could require either one centrally located large park, or two smaller parks distributed for easy community access across the development. The priority location for parks is within medium density and general residential areas, with any large lot residential living being closer to the margins of accessibility if necessary.

The nearby Council owned Panckhurst Reserve caters for existing residents in the area north of Judsons Road. It has no capacity to absorb new residential development.

A green linkage network is required to provide adequate off-road connectivity within the proposed rezoning areas. Restoration of the McIntosh Stream corridor is a key element. It will help facilitate community development, recreational opportunities and environmental enhancement. The denuded wetland sites should be retained in the interim until further ecological assessments are made regarding their values.

Momentum & Suburban Estates

In the event of a zone change and residential development of land subject to the Momentum and Suburban Estates submissions, provision of neighbourhood park greenspace is already anticipated by the applicable Structure Plan and proposed Outline Development Plan. Depending on residential density, the two parks proposed may not be adequate to meet Council's level of service requirements for neighbourhood park provision. Any required increase can be achieved by enlarging the proposed park sites, or via the addition of a further park within the proposed ODP area. Requirements can be calculated by referencing Waimakariri District Council's level of service requirements for neighbourhood park access in urban and suburban areas. This requires most residents to be within 500m, or a 10-minute walk, of a neighbourhood park; and 1.0ha of park space to be provided per 1,000 residents (approx. 420 dwellings). In addition, the minimum viable size for a neighbourhood park is 0.3ha.

The priority location for parks is close to medium density areas and within required access distance of general residential sites. Connectivity with a road frontage and green off-road linkage networks is advocated. Community connection to an enhanced McIntosh Stream corridor will be important in activating recreational opportunities and environmental enhancements that promote community development and interaction.

Mike Greer (South Kaiapoi)

The overall level of green linkage reserve provision and associated connectivity is appropriate for a proposed medium density residential zone. In combination, the linkages provide landscape amenity and associated recreation benefits, along with the potential for revegetation and ecological enhancement of the Kaikanui and Courtenay Streams. The appropriate vested status of these sites can be confirmed at subdivision stage. Beyond boundary treatments, a well-designed amenity streetscape will be critical in breaking up the built-form dominance of the development's interior. This is a level of service requirement for Council streetscapes.

The proposed recreation reserve (neighbourhood park) in the north of the development is appropriately located in terms of setting but is under-sized based on Council parks level of service requirements for the proposed resident population. With the indicative residential lot overlay, it also has an unnecessary semi-private context. These issues can be resolved if the

extended row of small residential lots is pulled back from the park space or otherwise redistributed to provide a more open and accessible feel to the neighbourhood park as a wider community destination. Council's requirement for neighbourhood park provision is most residents to be within 500m, or a 10-minute walk, of a neighbourhood category park; and 1.0ha of park space to be provided per 1,000 residents. Given lot numbers, this suggests a park space of approximately 0.4 to 0.45 hectares at this site...exclusive of the esplanade and rail buffer margins.

Fechney et al (Chinnerys Rd)

In isolation, this submission proposal does not trigger a requirement for any additional public park space if rezoned as General Residential. A large area of neighbourhood park open space is available within the neighbouring Grange View Reserve. This park is easily accessed by any of the three entry/exit points that bisect and surround the current subject sites. In addition, the stream esplanade walkways located directly across Chinnerys Rd will be readily accessible once this stage of the Ravenswood development is completed.

If the rezoning goes ahead, the retention of any notable or high value landscape trees is advocated to help retain valuable landscape amenity where practicable. This would also benefit the adjacent park setting.

Hobson and Whimp (4 Golf Links Rd & 518 Rangiora-Woodend Rd)

Assessed in isolation a rezoning of this site to General Residential does not trigger the provision of a public neighbourhood park. As a proposed satellite development within a currently rural zone, the population catchment will likely be less than the 250-300 residents required to trigger public park provision for the community. It is difficult for Council to efficiently and effectively plan for – or commit to – public community green space provision in outlying or isolated sites where future surrounding growth is uncertain or disconnected. Investment without the discipline and guidance of wider Structure and Outline Development planning is prone to risk and unsatisfactory outcomes for both Council and the subject community. For this reason, outlying stand-alone residential zones with limited or no access to existing key community resources such as parks are not advocated.

WAIMAKARIRI DISTRICT COUNCIL

MEMO

FILE NO AND TRIM NO: DDS-14-13-03 / 240716116524
DATE: 12 July 2024
MEMO TO: Peter Wilson, Principal Policy Planner
FROM: Chris Bacon, Network Planning Team Leader
SUBJECT: Residential Rezoning Proposal for 20 and 24 Angus Place, Rangiora

Peter

As discussed, I have reviewed the proposal to rezone the land at 117 and 113 Townsend Road (now 20 and 24 Angus Place) in respect to the underlying flood hazard from an Ashley River Breakout.

These properties are both under the flowpath from an Ashley River breakout and are shown as having significant areas of Medium Flood Hazard in both the 200 year and 500 year flood events. Under an Ashley River breakout scenario both parcels of land would be subject to significant flood velocities exceeding 1.0 m/s. Refer to Figure 1 for the model results.

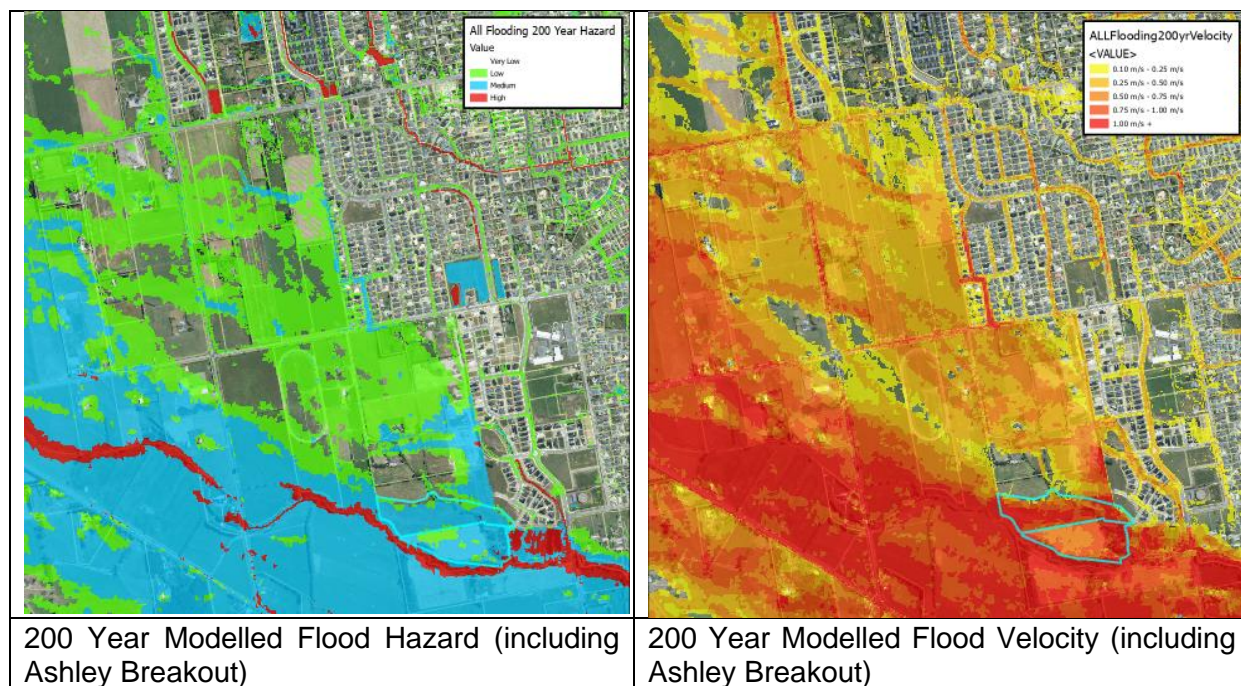


Figure 1 - 200 year Model Results

In my opinion it would be impractical to mitigate this flood hazard. Any attempts to raise the land or provide for a bund to the west would impact severely on neighbouring properties to the south and would represent an obstruction to the Ashley River Breakout pushing the primary breakout channel further south. Without better understanding the impacts of such works on these neighbouring properties and the larger flood channel it would be inappropriate in my opinion for the Council to support a residential rezoning request in this area.

It is noted that Townsend Fields have previously undertaken works to mitigate a much smaller flood hazard to the north of these sites by constructing a temporary bund and diverting floodwater through this area. It is also noted that future plans to develop land east of Lehmans Road may also feature a bund to divert secondary flowpaths from the Ashley Breakout.

The key difference with the Townsend Fields works and the future planned works along Lehmans Road is that it is mitigating secondary flowpaths from the breakout flow and diverting them back into the primary channel. Any works on the properties at 20 and 24 Angus Place would be interfering and diverting the primary flood channel.

I also note that the dynamics of the flood hazard in West Rangiora is very different to the flood hazard in Northeast Kaiapoi. In the Northeast Kaiapoi area the flood hazard on the undeveloped land has been assessed as 'High' and is predicted to have much higher flood depths than those predicted in the West Rangiora area from the Ashley Breakout. The flood hazard in West Rangiora is largely due to fast moving water with moderate flood depths. However the flood hazard in Northeast Kaiapoi is largely due to deep ponding water with very low velocities from a combination of Localised Rainfall and Coastal Inundation.

The proposed mitigation measures for Northeast Kaiapoi rely largely on simply raising the land and the effects from this have been assessed and demonstrated to be less than minor on the neighbouring properties. Recent construction of a new flood pumpstation by the Council under the Government's Shovel Ready programme has further helped in providing mitigation for these effects in Northeast Kaiapoi.

The flood effects from partially obstructing and diverting the primary Ashley Breakout flood channel in West Rangiora have not been assessed.

Appendix G. Urban design memorandum

Statement of Qualification and Expertise of

Edward Jolly

Dated 18 July 2024

Qualifications and Experience

1. My full name is Edward Lewis Jolly. I am an Associate Principal and Senior Urban Designer for the architecture and design company Jasmox, based in Christchurch. I have a Bachelor's Degree (with Honours) in Landscape Architecture (BLA) from Lincoln University and a Master's Degree in Urban Design (MAUD) from the University of Westminster, U.K.
2. My experience includes over 24 years' working in urban design and landscape architecture in both the public and private sector, in both the UK and in New Zealand. I have previously provided urban design evidence and or advice for District Plan review, Environment Court Proceedings, Outline Development Plans, Notice of Requirements, Housing Accord Special Housing Area hearings, and resource consent hearings. My experience also includes 3 years as a Principal Urban Designer for Auckland Council, where I was involved in providing urban design expertise for strategic plans and in the assessment of resource consent applications.
3. My current role is lead of Urban Design and Landscape Architecture at Jasmox's office in Christchurch, although my role includes work across New Zealand. Jasmox specialises in architecture, interior design, landscape architecture, urban design and master planning. It has a history spanning 47 years across many notable local, national and international projects.
4. My most recent relevant experience includes:
 - (a) Engaged by Waimakariri District Council (**WDC**) for expert urban design advice and preparation of the Residential Character and Intensification Guidance as part of the District Plan review process;

JASMAX

Architects
Urban Designers
Landscape Architects
Interior Designers
Brand Designers

Auckland
Wellington
Christchurch
Sydney

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- (b) Engagement by Christchurch City Council (**CCC**) to provide expert evidence on urban design issues relating to the CCC Replacement District Plan provisions on Residential Medium Density, and the city centre Guest Accommodation and Special Purpose (Hospital) zones;
- (c) Engagement by Selwyn District Council (**SDC**) to provide expert urban design advice for the Selwyn District Plan Review, Transport Chapter Assessment;
- (d) Engagement by Queenstown Lakes District Council (QLDC) to provide expert evidence on urban design issues for the direct referral to the Environment Court hearing of the Skyline Gondola in Queenstown;
- (e) Engagement by the University of Canterbury to provide expert evidence on urban design issues relating to the CCC Replacement District Plan provisions on the Specific Purpose (Tertiary Education) zone;
- (f) Engagement by Queenstown Lakes District Council for the Housing Accord Special Housing Area hearing of the Bridesdale Farms development;
- (g) Engagement by Queenstown Lakes District Council for the urban design assessment review for both the Northlake Investments, and the Allenby Farms Outline Development Plans; and
- (h) Engagement by Auckland Transport and KiwiRail for expert urban design in regard to the Auckland City Rail Link, in the preparation of the rail and station reference design and expert evidence for the Environment Court in regard to the Notice of Requirement proceedings.

Code of Conduct

5. I confirm that I have read the Code of Conduct for Expert Witnesses as contained in the Environment Court Practice Note dated 2023. I agree to comply with this Code. The urban design advice I have given is within my area of expertise, except where I state that I am relying upon the specified evidence of another person. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

Memo

To: Peter Wilson

From: Ed Jolly

Date: 25/03/2024

Subject: Doncaster Development ODP UD Review

Greetings Peter

This memo outlines my initial comments in relation to the proposed Doncaster Development ODP. In general the ODP outlines a logical and efficient approach to future development. The proposal is consistent with the structure set out in Northwest Rangiora ODP. The lot layout plan is useful to understand an indicative subdivision outcome of the ODP.

My initial comments are as follows:

- The proposal provides a good contextual analysis identifying connectivity with existing surrounding neighbourhoods and relationship to wider township context.
- The internal layout is logical and will provide a good level of connectivity and wayfinding to and through the ODP site for vehicle based movement. Access into the site is off Lehmans Rd and future Parrott Rd which is consistent with the Northwest Rangiora ODP.
- It is noted that access to future properties adjacent to Lehmans Rd will be direct from Lehmans Rd. This approach is supported from an urban design perspective. When considering the Indicative Site Development Plan provided there are a number of lots on the western side of the ODP site accessed via rear lots and cul-de-sacs. The numerous rear lots are not considered good practise urban design. Larger lots with access directly off Lehmans Road will mitigate the rear lot development. The proposed ODP approach of access of Lehmans Rd is therefore supported from a urban design perspective.
- Footpaths and cycle facilities are well established within the ODP, footpaths both sides of each road (as shown in the Indicative Site Development Plan) is supported and the two cycle / footpath access points off Stratford Way and Helmore St are sufficient to provide connectivity with adjacent residential neighbourhoods when considering the infrastructure constraints of the transmission lines. It is noted that these locations are indicative, they should be firmed up for the ODP to give clarity of outcome for future development.
- It is noted that street trees are proposed in the Indicative Site Development Plan, this is supported and will assist in providing urban tree coverage. However the potential coverage is limited to the minimal street provision and open space within the ODP site. It is also noted that tree cover will be limited within the proposed local purpose reserve due to the proximity of the pylons. See below for recommendations for additional streets and openspace.
- Open space provision within the site is limited and therefore it is recommended that an additional open space is provided internally within the ODP which becomes a neighbourhood focus. The current proposed open space (local purpose reserve) is aligned to the transmission pylons along the southeast boundary of the site. In this location the open space serves as a buffer to the infrastructure development restriction and less of a targeted recreational or placemaking asset for the future community. The reserve therefore will have a reduced opportunity for use from future residents. Consequently, it is recommended that an additional open space is provided within the site to complement the reserve and provide greater amenity, greenspace and urban tree coverage. Below is an indicative location for the additional park.

Memo

To: Peter Wilson

From: Ed Jolly

Date: 12/04/2024

Subject: Momentum Development ODP_ Beach Rd, Kaiapoi_ UD Review

Greetings Peter

This memo outlines my initial comments in relation to the proposed Momentum Development ODP, Beach Road Kaiapoi. In general, the ODP outlines a logical and efficient approach to future development. The proposal is generally consistent with the structure set out in the East Kaiapoi ODP. The lot layout plans are useful to understand an indicative subdivision outcome of the ODP.

My initial comments are as follows:

Northern Area

- Collector roads seem to be different from East Kaiapoi ODP with the main 25m collector further to the east than in the ODP. There is no urban design concern for this change. It is recommended that transport provides a response.
- Lot orientation is good with majority of sites are orientated east-west making best use of morning and evening sun aspect.
- The approach of clustering higher density residential lots around the mixed use local centre and lower density further away is a good response.
- The mixed use / local retail centre is clustered around a roundabout which should be reviewed (figure 1 below). Roundabouts are generally not conducive to good pedestrian access and hence the adjacency benefits for retail will be reduced. It is also noted that this will be the busiest collector in the ODP in terms of traffic.
- An alternative (see figure 2 or similar) is recommended where the mixed use lots are clustered together on one side of the main road (or potentially over one street but not all four sides quarters of the roundabout). The local centre could also be combined with a small reserve or park that brings some of the surrounding landscape quality into the development.



Figure 1 - Proposed Local Centre



Figure 2 Potential alternative local centre

- The green link is consistent with the Kaiapoi ODP, potentially it could directly engage with the mixed use local centre as well.
- The secondary (20m) collector will be an important connection through to the Kaiapoi North School.
- An additional connection between the two ODP sites and Beach Road should be considered with council (see figure 3 below). This road link would provide improved connectivity within the area as well as to the school from future residential neighbourhoods.



Figure 3 Potential road link

South Block

- The south block is orientated well to provide east-west lots and make the most of the morning and afternoon sun aspect.
- The green boundary treatment / buffer zone around the perimeter of the site is unclear in its purpose. Potentially this space is not very usable and may result in CPTED concerns if it is accessible for pedestrians (as it will have minimal overlooking and lighting etc). The use of the buffer zone land is not very efficient.



Figure 4 Proposed layout

- It is recommended that residential lots could back on to existing adjacent residential lots and school site without the buffer zone. This would allow a more efficient utilisation of the land, potentially less roads and opportunity to reconsider the open space provision so it is more usable for the community.
- Potentially this could allow a central reserve to be developed that is more usable for the neighbourhood providing a community focus (see figure 5 below).



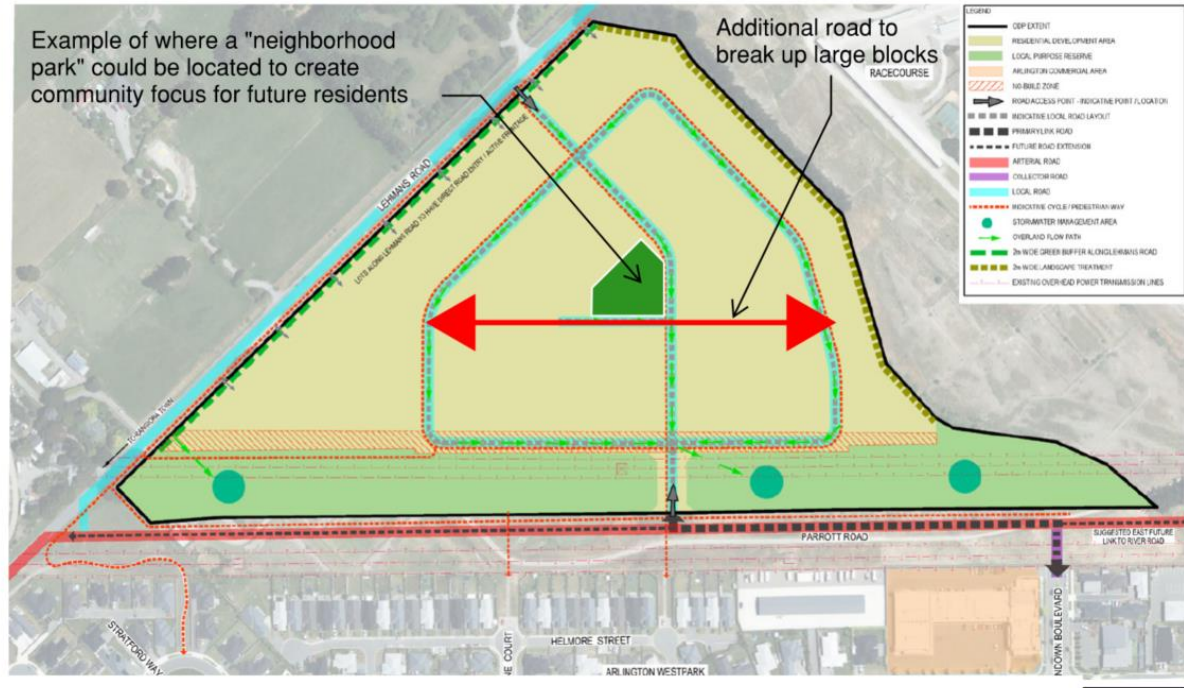
Figure 5 Potential alternative layout

- Properties along Beach Road could be accessed off Beach Road rather than an internal road. It is noted there is a current stormwater 'ditch' in this location which would need to be considered in terms of access however access off Beach Road would reinforce the future suburban character of the street with footpaths and street lighting as opposed to the existing rural layout.
- Alternatively, the front portion of the Beach Road interface could be given over to stormwater attenuation similar to the adjacent Beach Grove subdivision further east.

End.

- The street layout establishes a structure of large development blocks. These large blocks create constraints to pedestrian and cycle permeability, accessibility and wayfinding. Residential blocks of over 200-250m do not generally result in good outcomes often leading to vehicle orientated neighbourhoods. A tighter block structure will encourage greater pedestrian and cycle activity and connectivity within the neighbourhood. It is recommended that an additional street is introduced as shown in the red arrow below to provide a tighter block structure.

Outline Development Plan



- Although indicative the site development plan does indicate two sizes in lots with smaller sites located to the south and closest to existing residential neighbourhoods and larger lots towards the northern urban fringe. This approach is logical and supported from an urban design perspective.

End.

Memo

To: Peter Wilson

From: Ed Jolly

Date: 06/06/2024

Subject: Woodend Beach Road ODP_ Woodend_ UD Review

Greetings Peter

This memo outlines initial comments in relation to the proposed Woodend Beach Road ODP, Woodend. The proposed ODP is a basic layout for an area of rural activity land located between existing residential neighbourhood to the north and larger lot lifestyle lots to the southeast and Woodend Beach Road to the south. The site is not subject to an existing ODP. It is reasonable to assume that the land within the area north of Woodend Beach Rd of which this ODP occupies (in part) is appropriate for residential development.

My initial comments are as follows:

- The proposed ODP has been submitted as two variants. The basic structure is repeated with the change between the two variants being in the landuse zoning either all General Residential Zone GRZ or all Medium Density Residential Zone MRZ. From a context integration perspective, the MRZ is more appropriate as it ties into the zoning proposed in the PDP to the north of the site.
- One of the key features that runs through the site is a water course / McIntosh Stream and associated wetlands which requires restoration. From the proposed ODP drawings and aerial photography it is difficult to ascertain the exact location of the wetlands. The ODP proposes residential zoning in this area. It is recommended that this water course is enhanced and reinforced with further stormwater management area. See diagram below (figure 2)

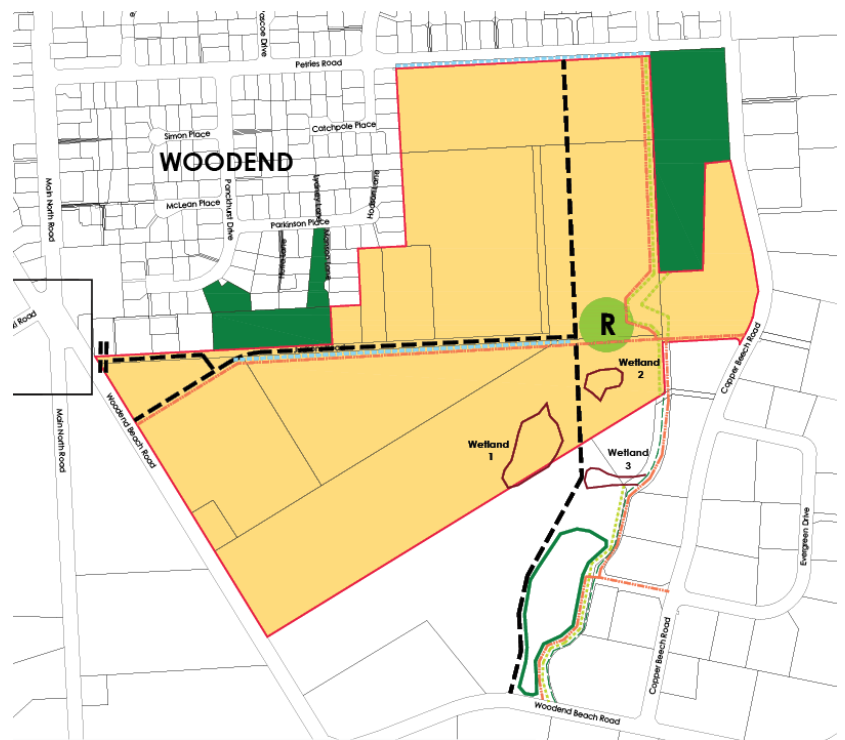


Figure 1 Proposed MRZ variant

on how land can be attributed to enhancement of Stormwater and the stream environment such that the stream environment both ecologically and for recreation purposes can be enhanced within this ODP site. Stream margins will require protective setbacks as well.

- The proposals provide very little in the way of public open space reserve. Medium density residential development will require higher demand on public open space and reserves therefore it is recommended to provide a centrally located large reserve with the site which will become a community focus and opportunity for passive recreation and play within the new neighbourhood. The alternative layout (figure 2) identifies a potential location for the reserve that will service new residential development within the ODP site. Its central location and size (approximately 1.5ha) allows it to provide access for the whole ODP site as it is within a 500m / 10minute walking distance from the majority of future homes. An alternative would be two smaller 0.75ha reserves, one located centrally in the northern area and one in the southern.

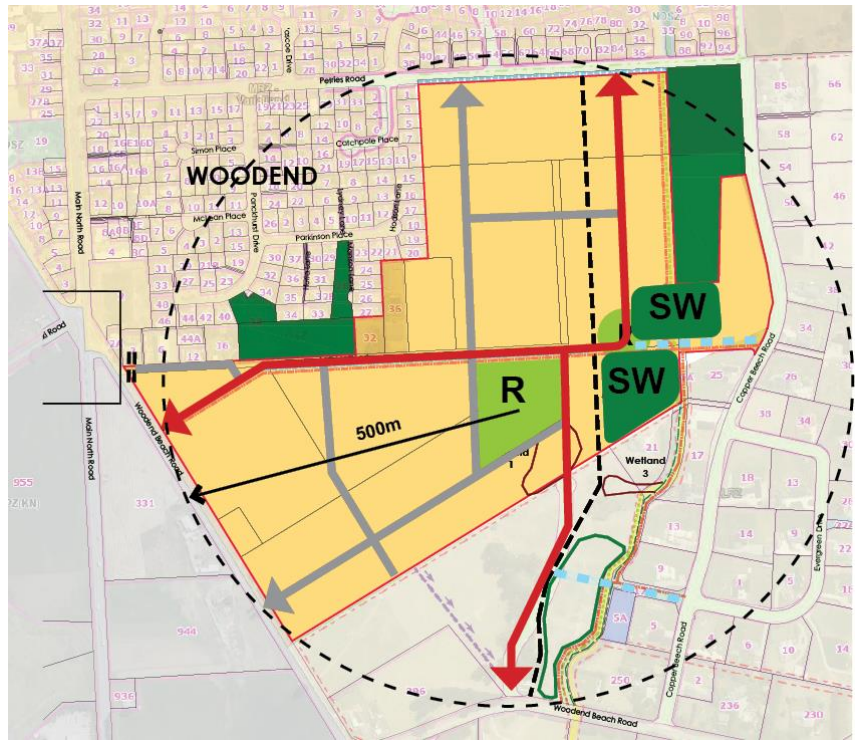


Figure 2 Alternative layout with central openspace reserve and additional stormwater aligned with water course and wetlands.

- The proposed ODP identifies 'primary roads' however in reality these should be secondary roads with Woodend Beach Road and Petries Road being the two primary roads in the area. The ODP identifies minimal secondary and local road connectivity within the ODP. It is recommended that further roads and means of connectivity are established. The diagram opposite (figure 2) provides a solution for road layout and connectivity within the site and connectivity back to the primary network. Consideration should also be given to how land is accessed and connectivity established into the site directly south of the ODP and north of Woodend Beach Road in the future.
- The pedestrian and cycle links identified in the ODP (and previously in the adjacent East Woodend ODP) are supported and will provide good connection across the stream and connectivity with the established residential areas off Copper Beach Road to the east of the site.

End.

Memo

To: Peter Wilson
From: Ed Jolly
Date: 07/06/2024
Subject: Winter and Sons, Main North Road_ South Kaiapoi_ UD Review

Greetings Peter

This memo outlines initial comments in relation to the proposed Winter and Sons subdivision proposal, Main North road Kaiapoi. The proposal is a subdivision layout for the area of rural activity land located between Main North Road, Main Trunk Railway, Kaikainui Stream and Courtenay Stream. The site is not subject to an existing ODP and is zoned rural/lifestyle in the operative and PDP respectively. It is reasonable to assume that the land within the site is appropriate for residential development as an extension of Kaiapoi township.

My initial comments are as follows:

- The proposed layout of the streets is logical and will provide good legibility and wayfinding for future residents and visitors. However from the drawing provided (figure 1 opposite) there seems to be little street hierarchy and all streets seem to be of the same dimension. This lack of hierarchy may potentially lead to undesirable traffic on local access streets as cut throughs. Potentially a simple loop road (based on the proposed street layout geometry) could be introduced which connects at both ends to Main North Road. The road would be wider than the other local roads reflecting its traffic role. It would provide the main structure to movement and access for the local roads within the site. Refer to Figure 2 for how this layout could be realised on the site. The southern connection onto Main North Road should be reconsidered as proposed it exits onto the existing bus stop and also creates a 4 way intersection across Main North Road which would require traffic management.



Figure 3 Proposed Plan

- The proposal does not identify any cycleways or key pedestrian routes which would provide benefit including connectivity within the site and with adjacent destinations such as Kaiapoi township. Figure 2 below shows a potential solution for the movement structure for the site and connectivity with its surrounding context.
- The two streams are key features adjacent to the site but have not been integrated into the proposal. There is opportunity for the neighbourhood to engage with these features through a series of interconnected walking and cycling routes that provide a unique feature of the development.

- The proposal provides a local reserve located in the protrusion of land to the north of the site between Kaikainui Stream and the main rail line. This is a poor location for open space as it is on the periphery of the site, it is hard to get to and is located through a cul-de-sac. The location of reserve openspace should be reconsidered in the proposal. Figure 2 illustrates an alternative where two openspace reserves are located centrally within the residential development. These locations will provide common openspace and potential to be a community gathering space and focus for the neighbourhood. They also have the potential to connect back through to the walking and cycling routes as previously identified overall creating a network of openspace and recreational opportunities for the site.

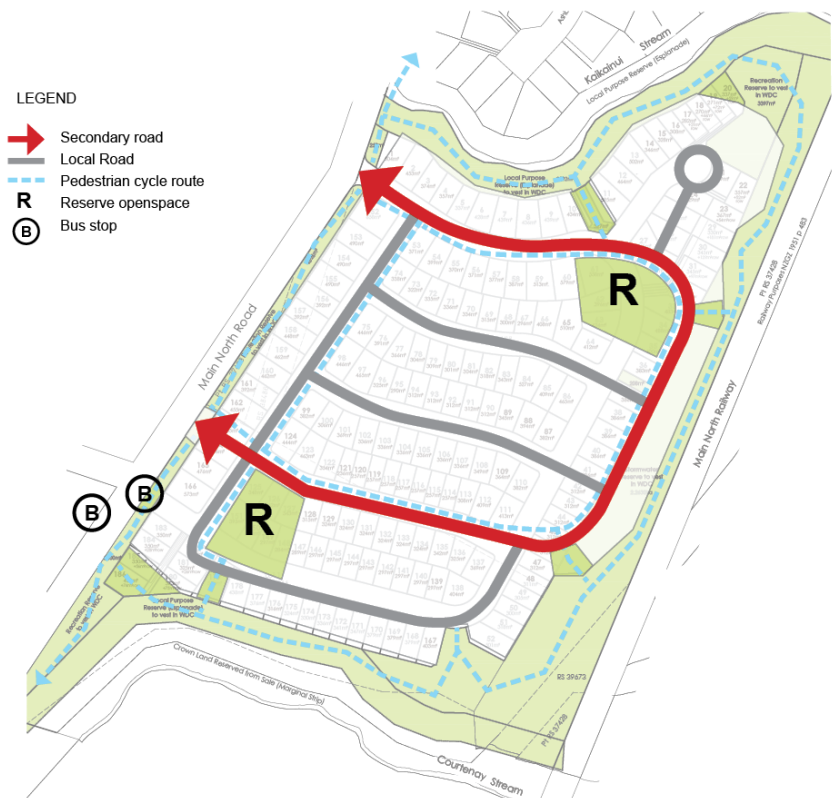


Figure 4 Potential alternative layout

- The proposed blocks will allow for a mixture of lot sizes and density consistent with the MRZ. Further north south lanes between the local streets could be introduced to provide access to smaller lots as required.
- The proposal includes a number of rear lots. These are not considered a great outcome for greenfield development particularly when they are attached to the end of a cul-de-sac as in the proposal. They don't provide good street address and can result in conflicts between vehicles and pedestrians. The rear lot approach should be reconsidered. Figure 2 illustrates a layout where rear lots are not required. A short cul-de-sac is retained in the northeast area and further design development will be required to avoid rear lot development in this area. The esplanade reserve could be increased in depth and larger lots could be used in this area for example.
- The proposal provides a variety of reserve setbacks (stormwater and recreational) as previously identified these provide great opportunity for walking and cycling opportunities as well as ecological enhancement along the stream edges. The stream setbacks should be generous enough to achieve appropriate ecological enhancement opportunities. The setback from Main North Road is consistent with established neighbourhoods north of Kaikainui Stream and therefore is supported as an approach. Again maximising the opportunity by providing walking and cycling routes connecting along the road edge is recommended and also to provide good connection with the bus stops on Main North Road.

End.

Memo

To: Peter Wilson

From: Ed Jolly

Date: 08/07/2024

Subject: Stokes, Gresson Road, Ravenswood_ Woodend_ UD Review

Greetings Peter

This memo outlines initial urban design comments in relation to the proposed Stokes Outline Development Plan, Gressons Road, Ravenswood. The proposal is for future development of the area of rural activity land located between Ravenswood and the Waikuku settlement adjacent to the Main North Road to the east and Gressons Rd to the North. The site is not subject to an existing ODP and is zoned rural in the operative and PDP.

My initial comments are as follows:

- The ODP is effectively a greenfield development that bridges between the Ravenswood and the Waikuku settlement. From an urban design perspective this could be a useful transition of residential development from Ravenswood Town Centre. For example medium density residential adjacent to Ravenswood Town Centre, suburban density residential to the north of the proposed ODP site and then the low density of the rural residential lifestyle within Waikuku. However it is recognised this may also result in loss of legibility and character of Waikuku as a stand-alone settlement with rural pastoral land separating it from the urbanised fringe of Ravenswood.



Figure 5 Proposed Plan in context with surrounding settlements.

- From a connectivity perspective the proposed layout of the north/south primary streets will provide good legible connection to the emerging Ravenswood Town Centre, a key focus for retail and employment in the area. These connections also align with streets/vehicle access routes within the Waikuku settlement. The connectivity into Ravenswood provides potential alternative vehicle routes to State Highway 1 as well as cycle and pedestrian connectivity opportunities. It is noted that an area of stormwater management has been developed with the Ravenswood ODP between the future town centre and the Sparks site. Therefore the success of stitching the two ODPs together with these north/south connections is reliant on changes to the layout of the stormwater management area within the Ravenswood site.
- The overall street hierarchy proposed with primary connectors supported by secondary streets at regular intervals sets up a logical and effective grid for development which will promote good legibility and wayfinding internally within the ODP. It is noted that from the 'sketch' plans provided (figures 1&2) that due to lack of a

legend to the plans and clear description the extents of the street network not completely clear. It is assumed that the black dashed lines are primary routes, the red dashed lines are secondary streets and the dotted yellow/brown lines are pedestrian and cycle routes. The diagram also illustrates where local streets and lanes will be located within each block in thick black solid and dashed lines (figure 3).

- In addition to the network of north-south and east-west streets proposed there are a number of pedestrian and cycle routes that follow riparian corridors, green links and openspaces. The result is a potential high quality active movement opportunities for future residents.
- In terms of the water courses identified in the proposed ODP (light and mid blue colours) it is unclear if these are daylighted streams, drainage 'swales' or culverted stormwater diversions. Hence the quality of the proposed 'blue-green corridors' is uncertain. It is also unclear in terms of proposed setbacks if they are in addition to councils' standards and wide enough to result in ecological enhancement and allow pedestrian and cycle paths.
- The proposal provides two public openspace reserves as well as 'green space' setback from the state highway. The larger 3.0 Ha centrally located reserve will provide a focus for future community residents. It is well located and benefits from connecting to the proposed green corridor and link. The smaller reserve is an elongated space which straddles the green corridor. This space could be improved and planned such that it has a more useable footprint, a more regular shape rather than the proposed lineal space. The green space adjacent to the state highway is generous and has the potential to provide passive recreational opportunities for future residents as well as stormwater management. Limited detail is provided in the ODP in terms of how activity is planned for this space. It is noted that the



Figure 2 Proposed layout

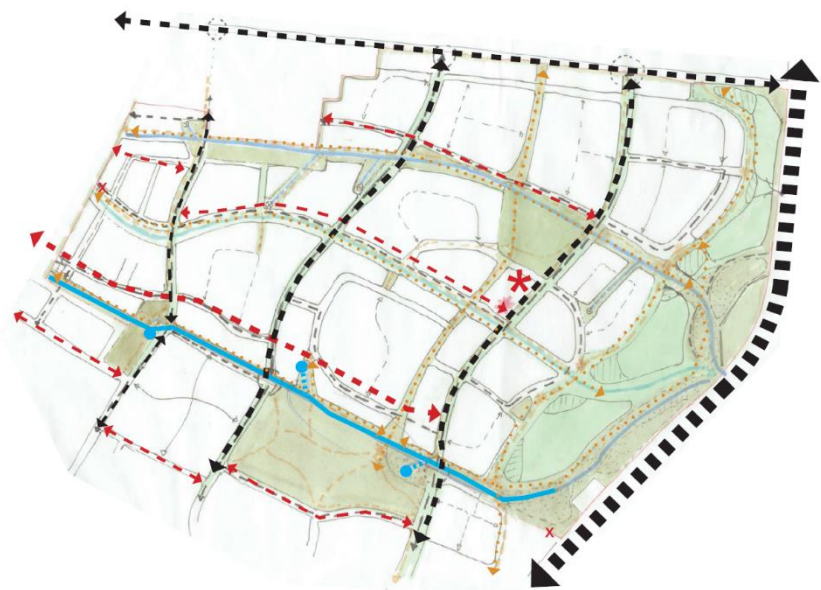


Figure 3 Proposed Street Hierarchy

- The ODP also identifies a future 'Community Hub' although limited detail is provided in terms of what this activity is, it's proposed location adjacent to the larger open space is well considered reinforcing the openspace as a potential future community focus.
- The proposed ODP does not provide much clarity on future lot orientation or size. As discussed above the site has the potential to provide a transition from the centre of Ravenswood north to Waikuku. Hence there is an

opportunity to provide a range of lots sizes. Lots consistent with medium density 200-300m² could be proposed along the southern boundary within walking distance of Ravenswood and then more generous lots in the order of 500-600m² to the north of the site (aligning with the GRZ and SZ). It is noted that if the approach was undertaken it would be important to provide additional open space to enable medium density within the blocks surrounding these lots within the southern half of the site.

End.

Memo

To: Peter Wilson

From: Ed Jolly

Date: 10/07/2024

Subject: East Rangiora_ Bellgrove Site UD Review and updates

Greetings Peter

This memo outlines initial urban design comments for the East Rangiora ODP and the proposed Bellgrove amendments. It also provides some initial design considerations for further amendments to the ODP to enable access and future development on the Kelly site (north side of the Cam / Ruataniwha River).

The area is subject to an existing ODP (Figure 1) and the amendments proposed by Bellgrove to include their land within the extents of the ODP.

The key issue with the current ODP is that it does not enable access into the Kelly site on the eastern side of the Cam / Ruataniwha River as access is restricted for traffic safety reasons from the Rangiora – Woodend Road. A portion of the Kelly site has been identified for future development in the ODP (figure 1) but is not located at a sufficient distance from the curve in the road to allow a safe entry point.

Two potential solutions have been explored, the first is to extend the future development area within the ODP on the Kelly site further away from the curve in the road to allow a safe entry location and the second is to provide access over the Cam / Ruataniwha River into the Kelly site. It is noted with the



Figure 6 Existing ODP

later option relies on the development of the Bellgrove land on the western side of the Cam / Ruataniwha River to be developed first such that a connection can be made that links up with the rest of Rangioras' street network.

Jasmax has prepared a sketch plan (figure 2) to assist the preparation of potential amendments to the ODP and councils recommendations for this area that explores these two options.

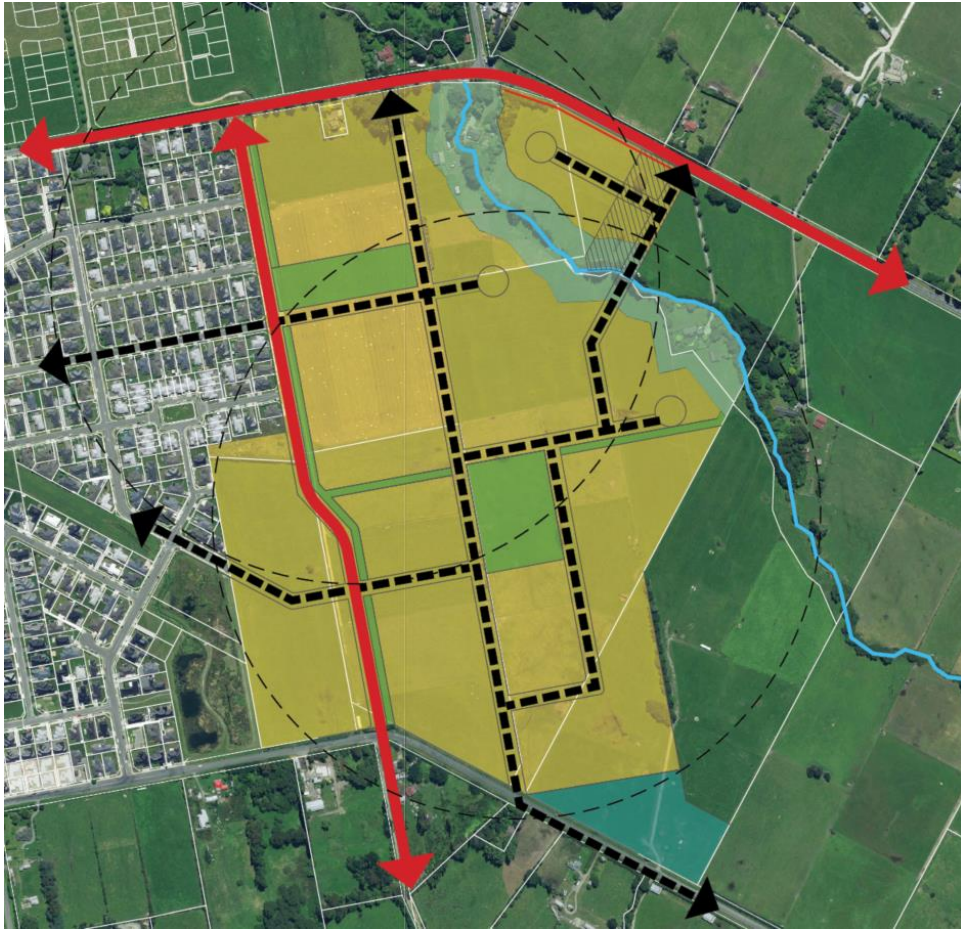


Figure 7 Sketch plan of potential ODP

The key elements of the sketch plan are:

- Extend the boundary of the ODP further along the Rangiora – Woodend Road- shown in the hatched area to allow safe access into the Kelly site.
- Provide a street connection along the boundary of the extended ODP area within the Kelly site to provide a single point of entry from the Rangiora – Woodend Road and a natural separation with the remaining rural zoned Kelly site.
- Branching off the access street a secondary street is then proposed to align parallel to the Rangiora – Woodend Road enabling access to future residential developments.
- The access street can also then provide connection over the Cam / Ruataniwha River and into the Bellgrove site allowing neighbourhood connectivity and access to community facilities such as green spaces and parks.
- A widening of the riparian corridor setback from the Cam / Ruataniwha River to 40m either side within the ODP area to enable habitat creation and restoration, stormwater management and recreation opportunities with walking and cycling links.
- Maintaining the key primary north-south link (shown in red) within the western side of the ODP through the Bellgrove site.
- Realignment of the secondary links (shown in black) to both stitch the ODP into the existing established neighbourhoods further westward but also to reduce potential undesirable traffic outcomes and rat-running through the Bellgrove site, via the new connection over the Cam / Ruataniwha River and through the Kelly land onto the Rangiora – Woodend Road.

- Extension of east-west green links across the extent of the Bellgrove site to connect up with potential pedestrian and cycle links within the riparian corridor.
- Provide two open space parks (approx. 1.0-1.5ha in size) to provide amenities such as play, parks, social gathering spaces and informal recreation spaces for future residents.

End.

Memo

To: Peter Wilson

From: Ed Jolly

Date: 10/07/2024

Subject: Northeast Rangiora_ UD Review

Greetings Peter

This memo outlines initial urban design comments and design for the Northeast Rangiora ODP and in particular the two areas of land either side of West Belt Road between River Road and the Rangiora Racecourse access road (Racecourse Road) in the northeastern extent of Rangiora. The site is zoned urban Res 4b in the operative plan and Large Lot Residential (LLRZ) / General Residential (GRZO) in the proposed plan to enable an ODP to be prepared and give direction to future development.

Jasmax has prepared a sketch plan to assist the preparation of an ODP for this area (figure 1 below)

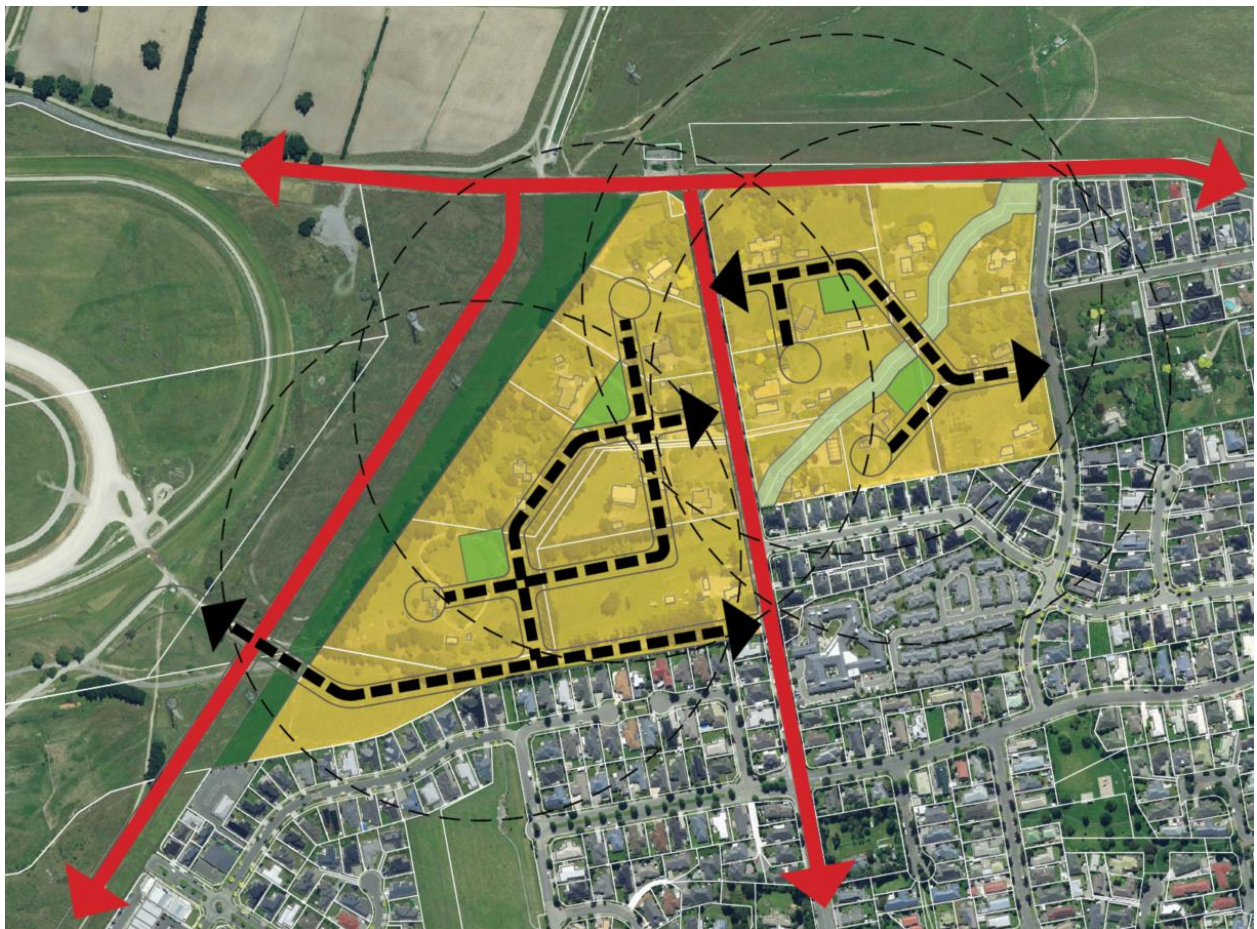


Figure 8 Sketch plan of potential ODP

The key elements of the ODP are:

- Extend Parrott Road northward to meet up with River Road which runs the length of the northern boundary of Rangiora.
- Formalise the vehicle access route to the Rangiora Racecourse between West Belt Road and the extended Parrott Road to provide additional access for future residential development within the ODP from the south, maintain access to the racecourse and to provide additional east-west movement opportunities for the wider area.
- Retain and enhance existing shelter and provide an additional green buffer strip between future residential development and the pylons along the alignment of Parrott Road.
- Provide secondary movement structure within the two areas, streets that will provide access to new development while maintaining access to existing and providing east-west connections to West Belt Road and Ballarat Road.
- Off-set connections onto West Belt Road to minimise rat-running through the residential streets.
- Locations for openspaces, to provide amenities such as play, parks, social gathering spaces and informal recreation spaces for future residents. Two 'pocket park' sized green spaces (approx 0.2ha) have been proposed in each area separated to provide walkable access to at least one open space for all future residents (within 250m or a 2-3min walk).
- Maintain the stormwater management corridor within the eastern area.

End.

Memo

To: Peter Wilson

From: Ed Jolly

Date: 11/07/2024

Subject: North Woodend_ Chinnerys Road_ UD Review

Greetings Peter

This memo outlines initial urban design comments and design for the North Woodend Chinnerys Road ODP and in particular the two sites to the south of Chinnerys Road between the Grange View Reserve and Woodglen Drive. The site is zoned Residential 4b in the operative plan and Large Lot Residential (LLRZ) / General Residential (GRZO) in the proposed plan to enable an ODP to be prepared and give direction to future development.

Jasmax has prepared a sketch plan to assist the preparation of an ODP for this area (figure 1 below)



Figure 9 Sketch plan of potential ODP

JASMAX

Architects
Urban Designers
Landscape Architects
Interior Designers
Brand Designers

Auckland
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Sydney

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The key elements of the ODP are:

- Maintain the extent of the Grange View Reserve and provide a widened and enhance entry into the ODP south from the park. This is to provide protection to established vegetation in this location and improve the connectivity, pedestrian and cycle routes between future residential development and the park which is a major recreational and social asset for the community.
- Introduce a new street through the northern block to provide access and east-west connectivity for future residential development. The street is located to avoid existing dwelling such that staged development can occur. The street is aligned to minimise loss of established vegetation although no data on the quality and importance of individual trees was available at the time of preparing this memo.
- Connect the existing Grange View Lane with the new east-west street connection providing options for access to development sites and pedestrian access to potential future recreational opportunities within the stormwater management area associated with the Ravenswood development.
- Enable future properties to front onto the Grange View Reserve providing enhanced CPTED benefits and social engagement outcomes.
- Provide three cul-de-sacs off Chinnerys Road to the eastern block to enable subdivision of land while maintaining opportunities to retain existing dwellings. The area is not sufficiently deep to provide a local street parallel to Chinnerys Road within this block.
- Maintain the stormwater management area / open culvert within the eastern block connecting with features associated with the Ravenswood developments.

End.

Memo

To: Peter Wilson
From: Ed Jolly
Date: 12/07/2024
Subject: West Rangiora ODP_ Rangiora_ UD Review

Greetings Peter

This memo outlines my initial comments in relation to the West Rangiora ODP. The ODP extends along the western extent of Rangiora between Oxford Road and the South Brook. The site is zoned Rural in the Operative District Plan and has been identified as a future Development Area in the Proposed District Plan. An ODP has been developed for this area (figure 1) which outlines a logical and efficient approach to future development. This memo focuses on additional improvements and considerations from an urban design perspective.

My initial comments are as follows:

- The proposed primary road structure (in red) provides a logical north-south spine running the length of the area. It provides connection between the existing key east-west movement routes of Oxford Road and Johns Road. It is noted that Lehmans Road is also an important North South connector and interface with the rural zone on the edge of this area.
- The secondary movement (black dashed lines) connect the central primary route eastwards towards established neighbourhoods in western Rangiora. However these secondary connections do not connect west to Lehmans Road which would allow future residential development west of the central spine and good integration into the movement network. It is therefore recommended that the secondary movement streets extent to Lehmans Road as shown in Figure 2 below.

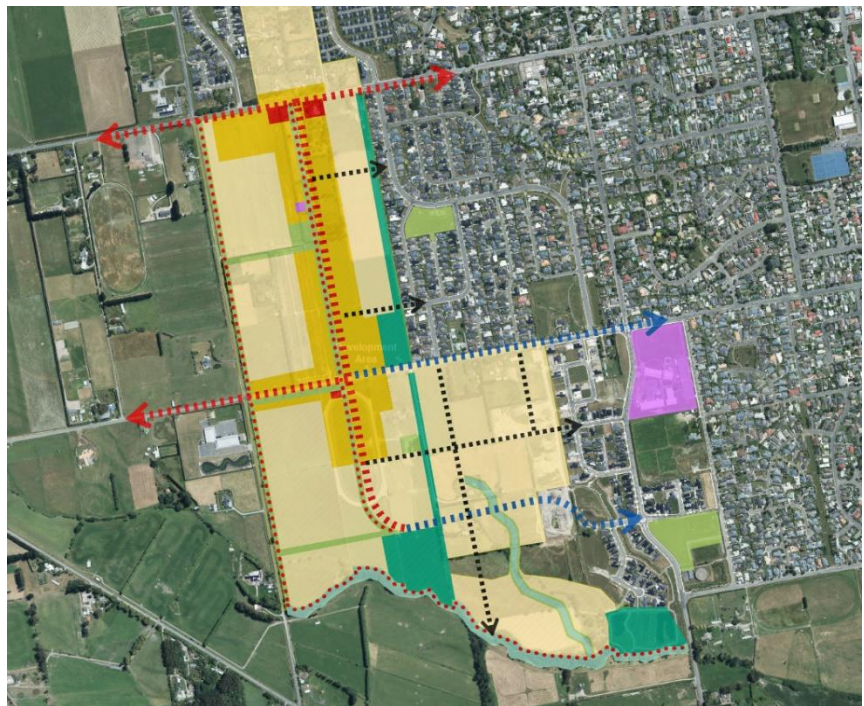


Figure 10 Proposed ODP

- Green space provision in the ODP is relatively limited and sparsely distributed through the area. The provision of open spaces is considered minimal both in terms of quantity and size. It is recommended that more substantial open space provision is provided within the ODP. Figure 2 below illustrates potential improvements to the ODP in terms of allocation of openspace, size and distribution. Note the dashed circles in the diagram represent

walking catchments of 400m or a 5 minute walk suitable for medium to large openspace. The key recommendations for additional openspace provision include:

- 1) A large recreational space in the northern extent of the ODP between Oxford Road and the first east-west secondary road to replace the proposed pocket park adjacent to the spine road. It is also recommended that the community facility (purple square) is better integrated with the open space rather than separated by residential development.
- 2) A larger openspace in the southwest quadrant to replace the pocket park in this location, allowing greater coverage and access for future residential development.
- 3) An additional openspace on the important east west secondary street connection between Te Matauru Primary School and Lehmans Road.

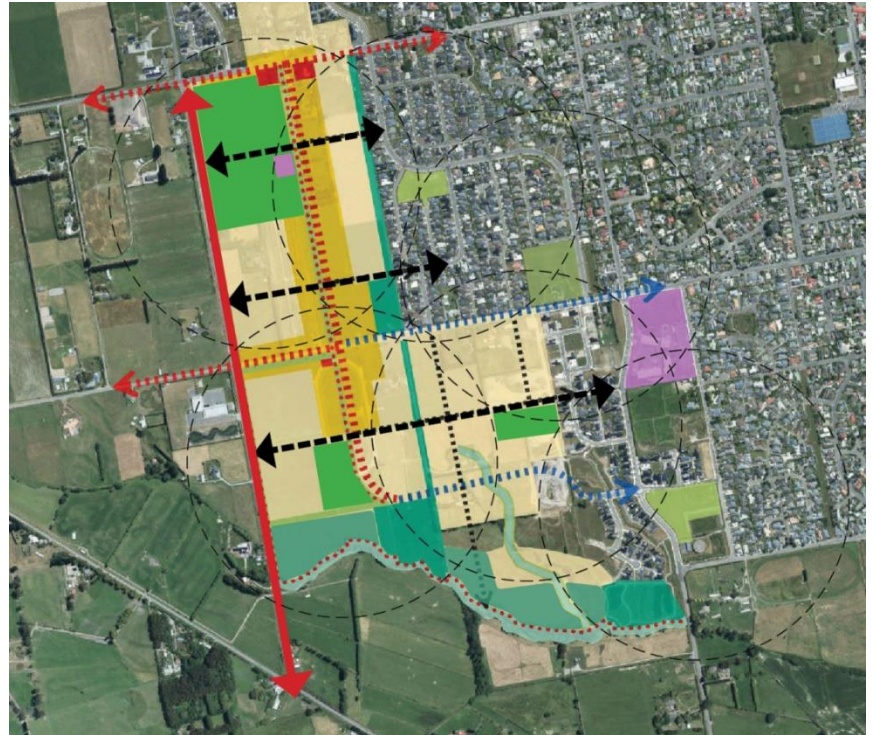


Figure 11 Recommended amendments to ODP

- In terms of stormwater management it was considered in discussion with council that the provisions along the southern edge of the ODP adjacent to South Brook are expanded and connected to form a continuous management area.

End.

Requested advice on Steve Higgs (Kaiapoi) open space rezoning request



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Memo

To: Peter Wilson
From: Ed Jolly
Date: 16/04/2024
Subject: Sparks Development ODP_ Boys Rd, Rangiora_ UD Review

Greetings Peter

This memo outlines my initial comments in relation to the proposed Sparks Development ODP, Boys Rd Rangiora. In general the ODP outlines a logical and efficient approach to future development. The proposal is consistent with the structure set out in Southeast Rangiora ODP (**SER ODP**) as it relates to the proposal north of Boys Road. The proposal extends substantially to the south of Boys Road which is not consistent with the SER ODP. The proposed ODP does not provide a lot layout plan which would be useful to understand an indicative subdivision outcome of the ODP.

My initial comments are as follows:

North of Sparks Road

- The proposed primary road is consistent with the SER ODP providing north south connection across the North Brook. This will provide some connectivity between adjacent neighbourhoods.
- However the secondary collector which is identified in the SER ODP also crossing the North Brook is absent in the proposal (shown as the red arrow in figure 1 below). Limiting the connectivity over the North Brook will potentially reduce the overall integration of future residential neighbourhoods. The location of the secondary collector in the SER ODP is in a logical location providing both east-west and north-south connectivity over the North Brook. Benefits of this secondary crossing include vehicular access alongside walking and cycling connectivity.
- The proposal introduces a 'small commercial node' which is inconsistent with the SER ODP. However from an urban design perspective this node which could consist of community facilities or neighbourhood shops could potentially play an important role in future community cohesion. It is recommended that consideration is given to its proximity in conjunction with the proposed open space reserve further to the south. The two if collocated together could potentially be a stronger community focus within the area.
- There are a number of stormwater management areas within the proposal. Their locations are consistent with the SER ODP along Boys Road and could provide a gateway landscape feature to the future neighbourhood.
- The concept plan shows two cul-de-sac heads within a large block to the eastern side of the proposal. The blocks dimensions are unclear however the scale is significant and will not

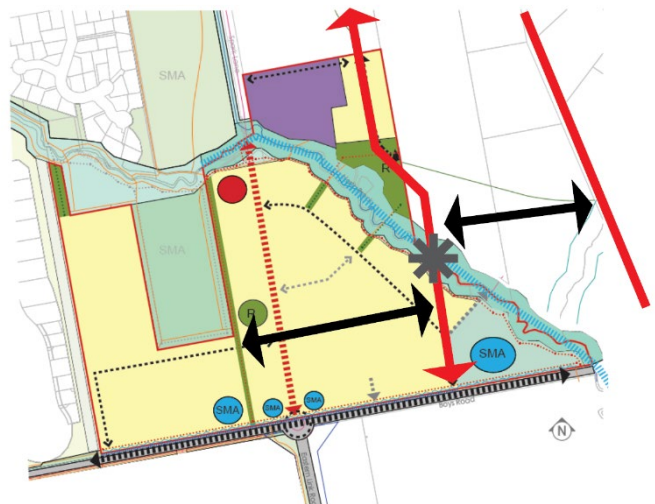


Figure 1 Additional North Brook crossing and improved connectivity with wider SER ODP

promote good walking and cycling through the block. It is recommended that the cul-de-sacs are joined to create a through road with traffic calming measures. This will allow greater pedestrian access and promote healthy active lifestyles.

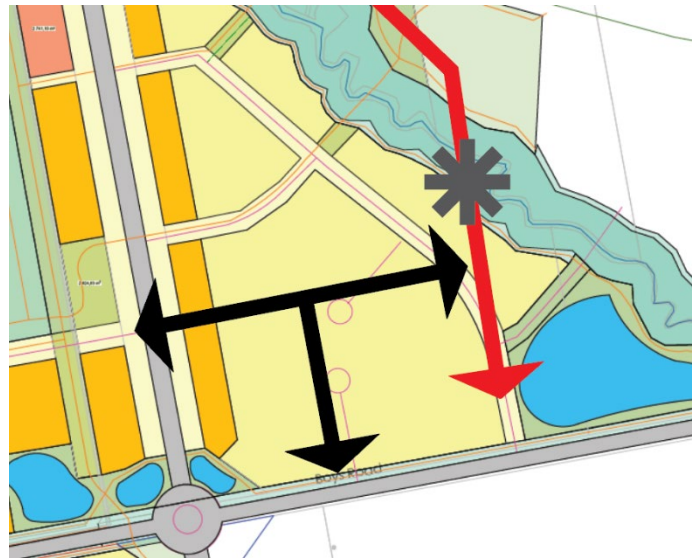


Figure 2 Connecting up cul-de-sacs with secondary connectors.

South of Sparks Road

The Proposed ODP south of Boys Road is outside the extent of the SER ODP. It is understood that the Eastern Link Road is currently in the LTP for consultation. For the purposes of this review it is assumed that the road is an element of the baseline.

- The proposal adopts a curvilinear approach to the street layout based on a loop starting and finishing on the Eastern Link Road. It is assumed that this approach was potentially taken to divert movement away from the rail line. However the curvilinear structure is an inconsistent approach when compared with the majority of the layout of Rangiora which is predominantly set out in variations of an orthogonal grid. A grid could also be adopted for this site which would provide greater legibility and connectivity with adjacent areas but also avoid additional rail crossings.
- The primary connectivity of the Eastern Link Road over Boys Road makes logical sense connecting the Northern and Southern portions of the proposed ODP. However due to the curvilinear approach to the loop road an opportunity to also connect the secondary road over Boys Rd has not been proposed. It is recommended that this secondary connection is considered with an additional intersection (rather than two separated tee intersections) this approach will increase the connectivity further between the north and south of Boys Road providing direct access.
- The railway line provides a barrier to connectivity east-west and restricts connectivity between future neighbourhoods in the proposed ODP with established neighbourhoods in Southbrook. The proposed shared cycle and pedestrian pathway which connects east-west is therefore supported and a safe crossing over the rail line is assumed part of the ODP development. The pathway will be an important connection between the Southbrook community including the Southbrook School and Rangiora New Life School and future neighbourhoods within the proposed ODP area.

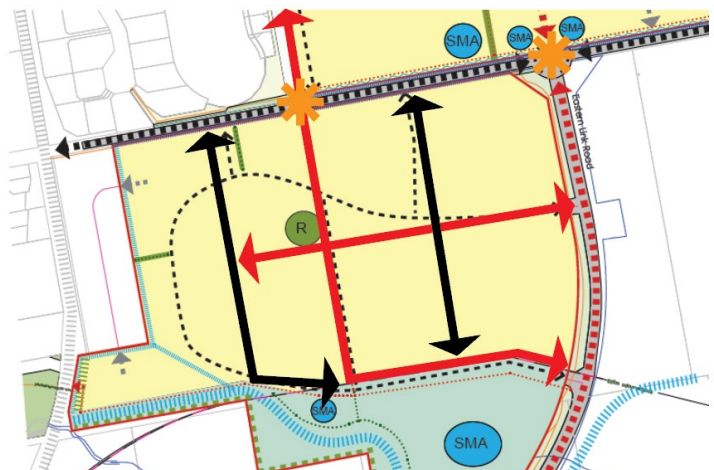


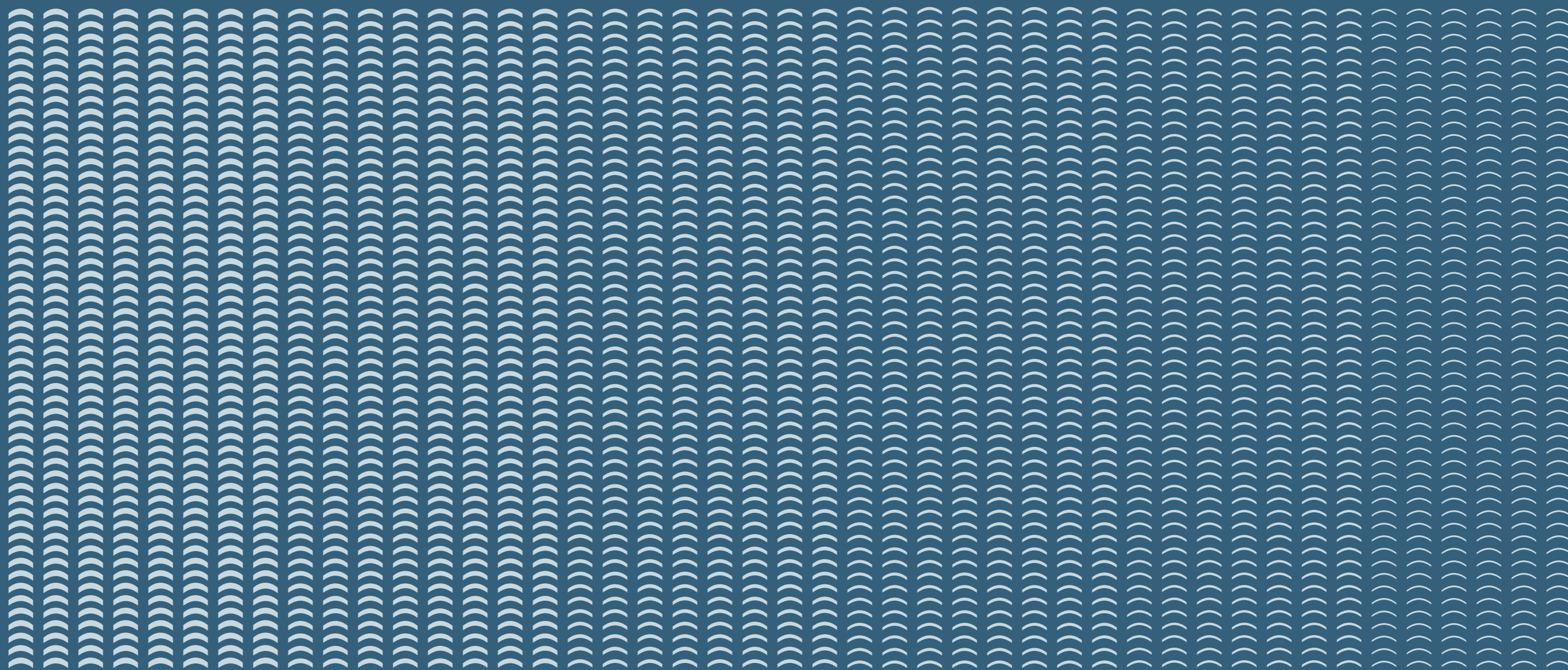
Figure 3 Potential orthogonal layout with additional connection over Boys Road

- A large proportion of site given over to stormwater management area. These areas will be important to manage stormwater but also to provide a porous edge to the urban fringe of Rangiora particularly when considering the strong edge created by the Eastern Link Road.
- The adjacent biodiversity area although supported seems hemmed in a corner that limits it's potential. Potentially it could be integrated with the SMA and form a much larger element within the proposed ODP.
- The light industrial area in the southwestern corner of the site seems isolated form other landuse activities. It is also contained within an irregular jagged property boundary and a residential property between the rail line and th proposed ODP. This may lead to difficult subdivision layout and sensitivity issues between uses. It is unclear how this site will be accessed and connected to established similar uses in the future.

End.

Brick Klin Lane ODP extension

Report



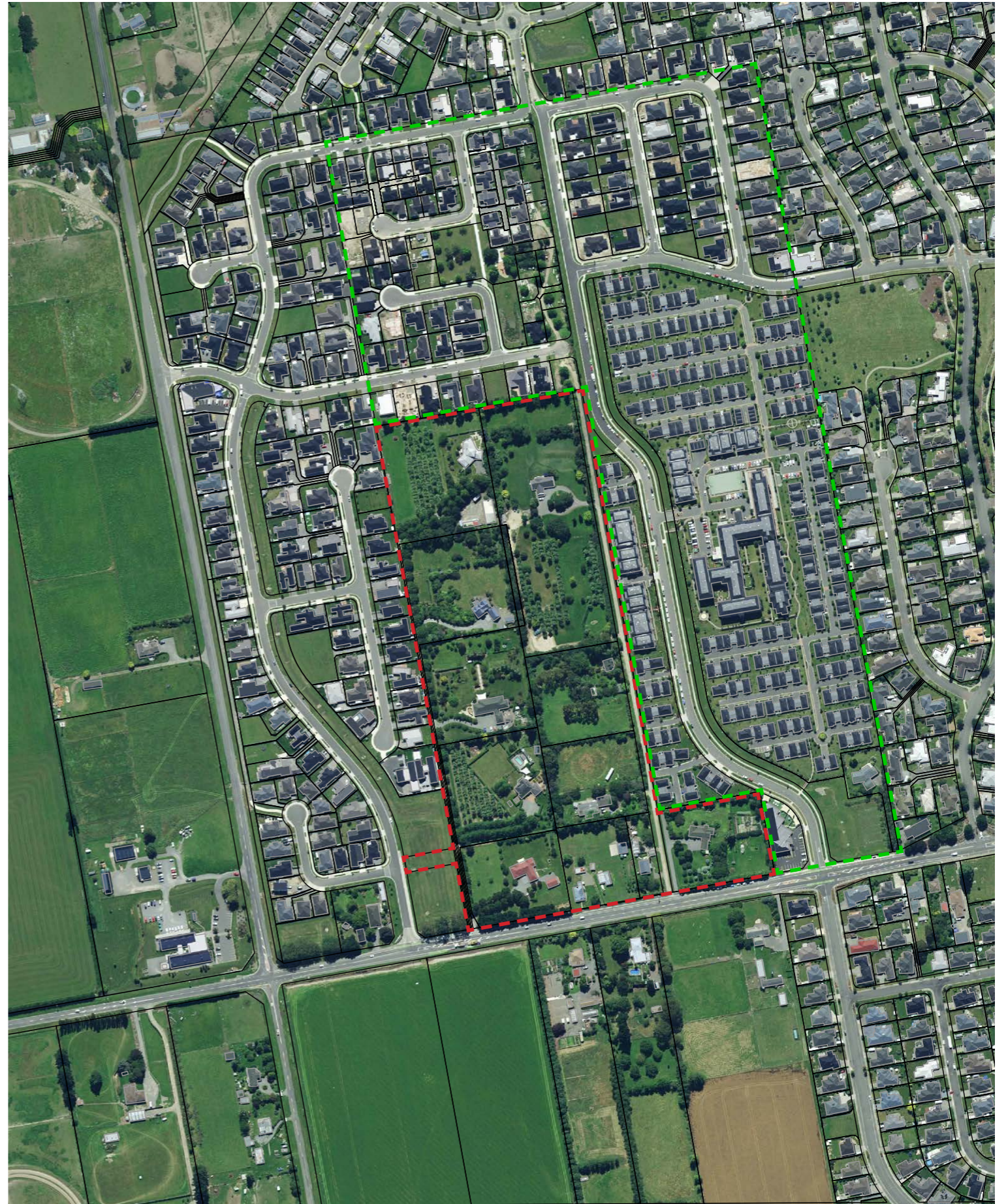
Brief

The Brief for the extension of the Oxford Road , West Rangiora ODP includes:

- Respond to submitters proposal for 70 Oxford Rd
- Minimise / rationalise vehicle crossings/driveways from Oxford Road
- Consider integration with existing Brick Kiln Rd
- Integrate latest thinking stormwater management planning
- Provide effective access to properties enabling landuse development
- Consider provision and location of open space within new ODP

Legend

- Operative ODP scope
- Extension ODP scope

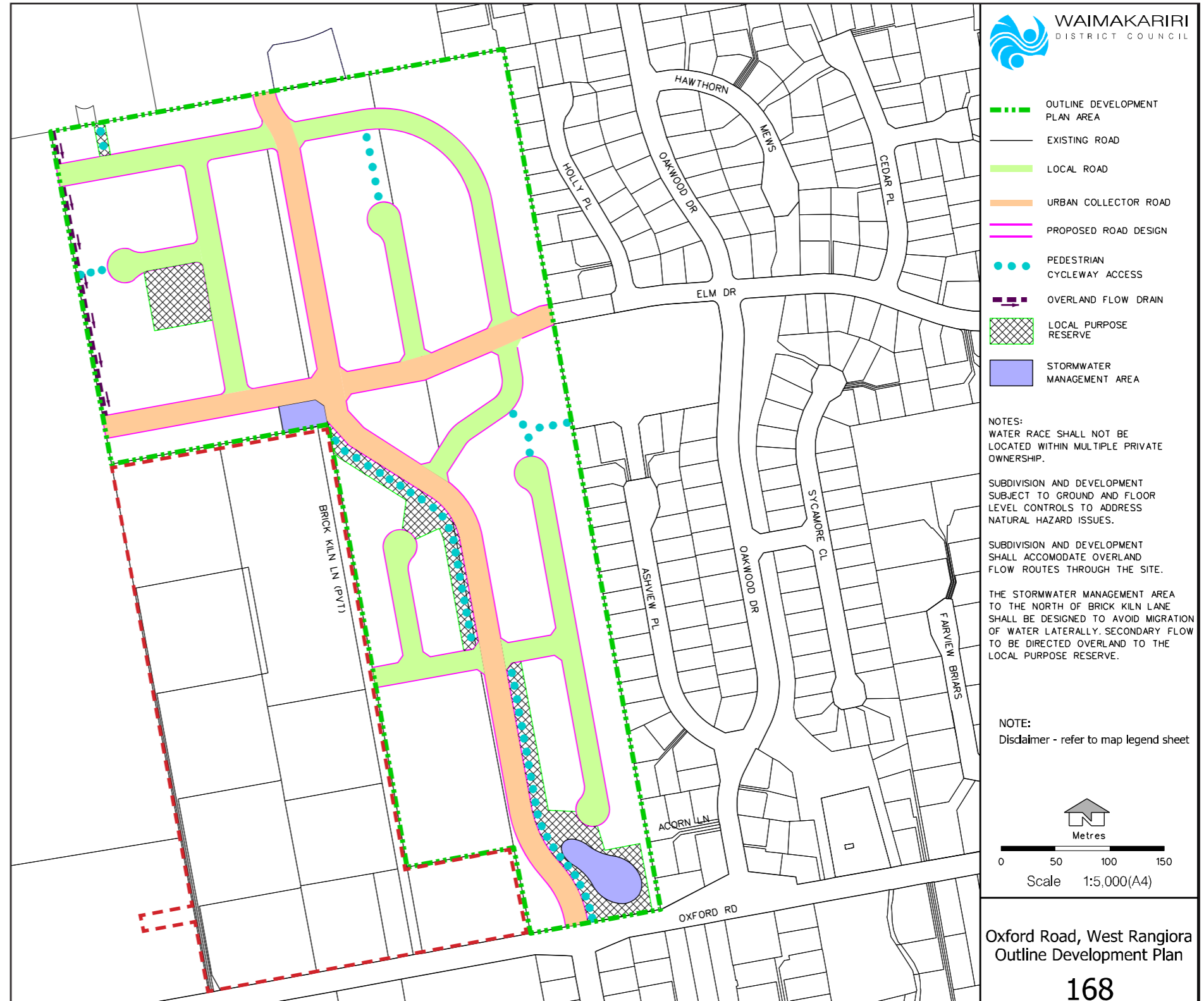


Oxford Road, West Rangiora ODP

The diagram opposite is the operative district plan
Oxford Road, West Rangiora ODP

Legend

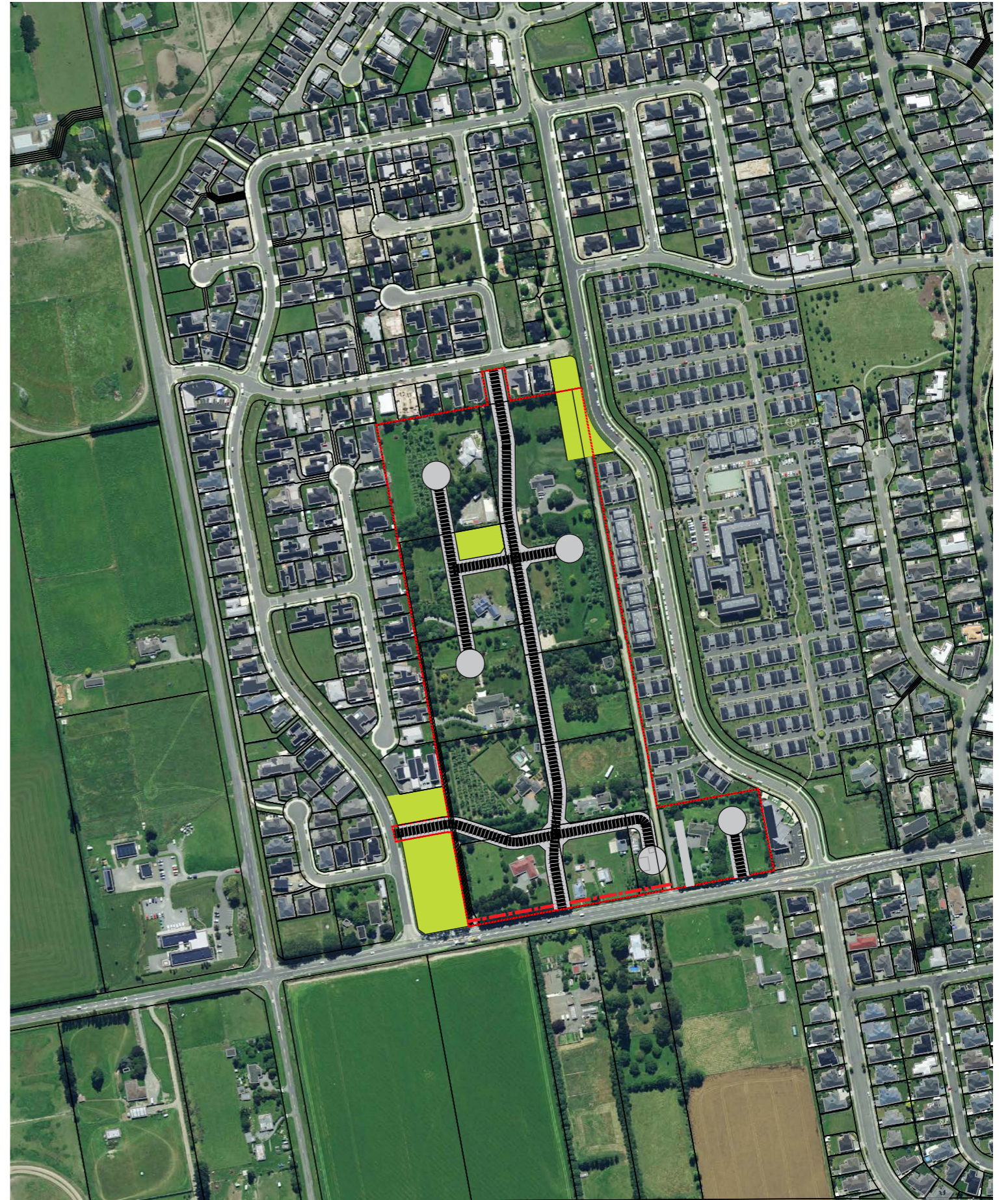
- - - Operative ODP scope
- - - Extension scope



Approach 1

Spine approach through providing north-south access through the middle of the ODP site.

- Distributes vehicle access off Oxford Road more evenly
- 70 Oxford Road remains as per the consent
- Road connection through exiting Reserve to adjoin Westpark Boulevard opposite Brantholme Place.
- Utilises vacant lot 7 on Chatsworth Ave to exit
- Additional reserve space to connect two reserves on corner of Chatsworth Ave and Charles Upham Drive
- One central neighbourhood reserve within the BKL ODP



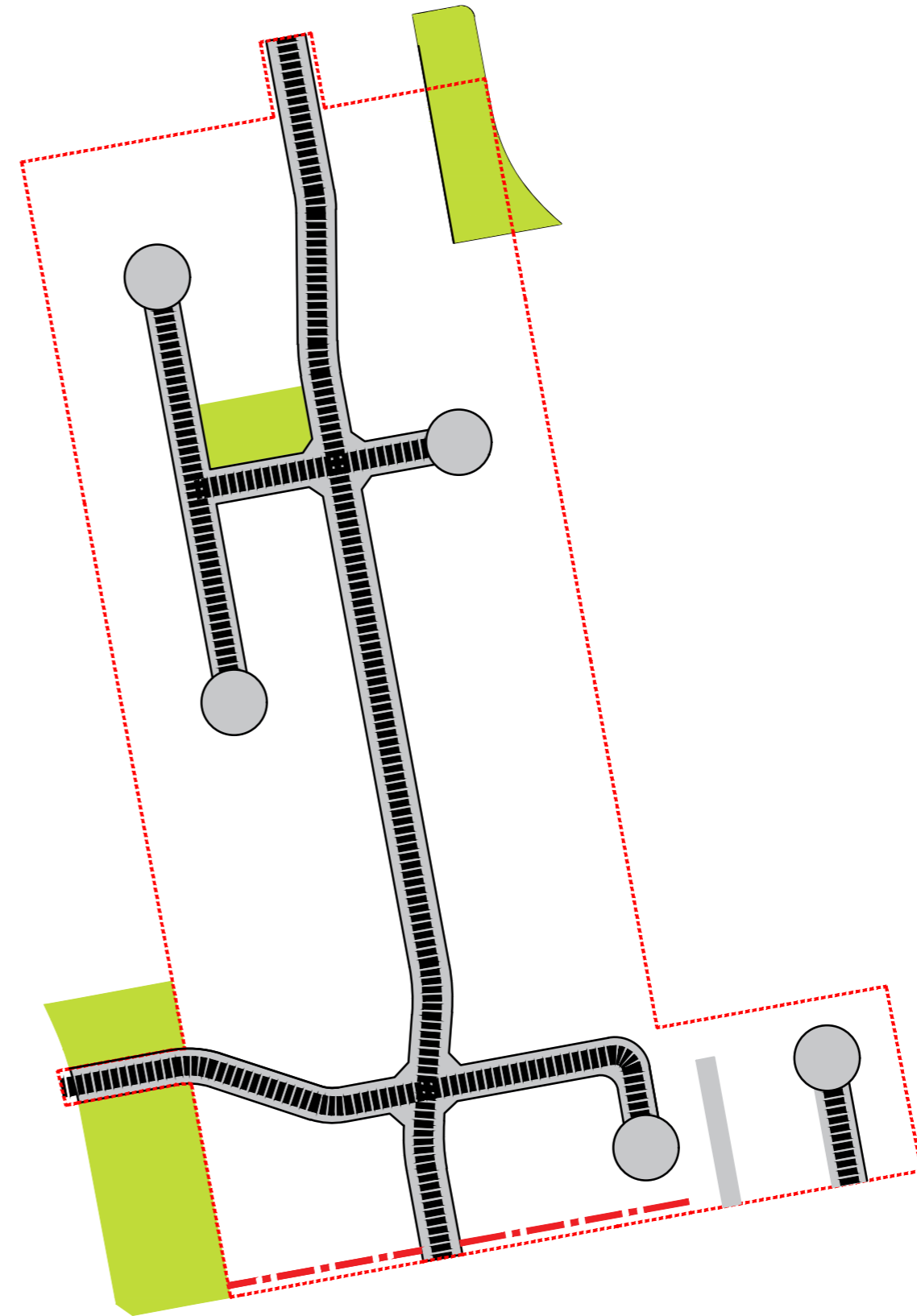
Approach 1



Legend

- ODP Boundary
- - - - - Restricted Access from Oxford Road
- ||||| Local road centre line
- ▬ Local road
- Reserve open space provision

Approach 1



Legend

- ODP Boundary
- Restricted Access from Oxford Road
- Local road centre line
- Local road
- Reserve openspace provision

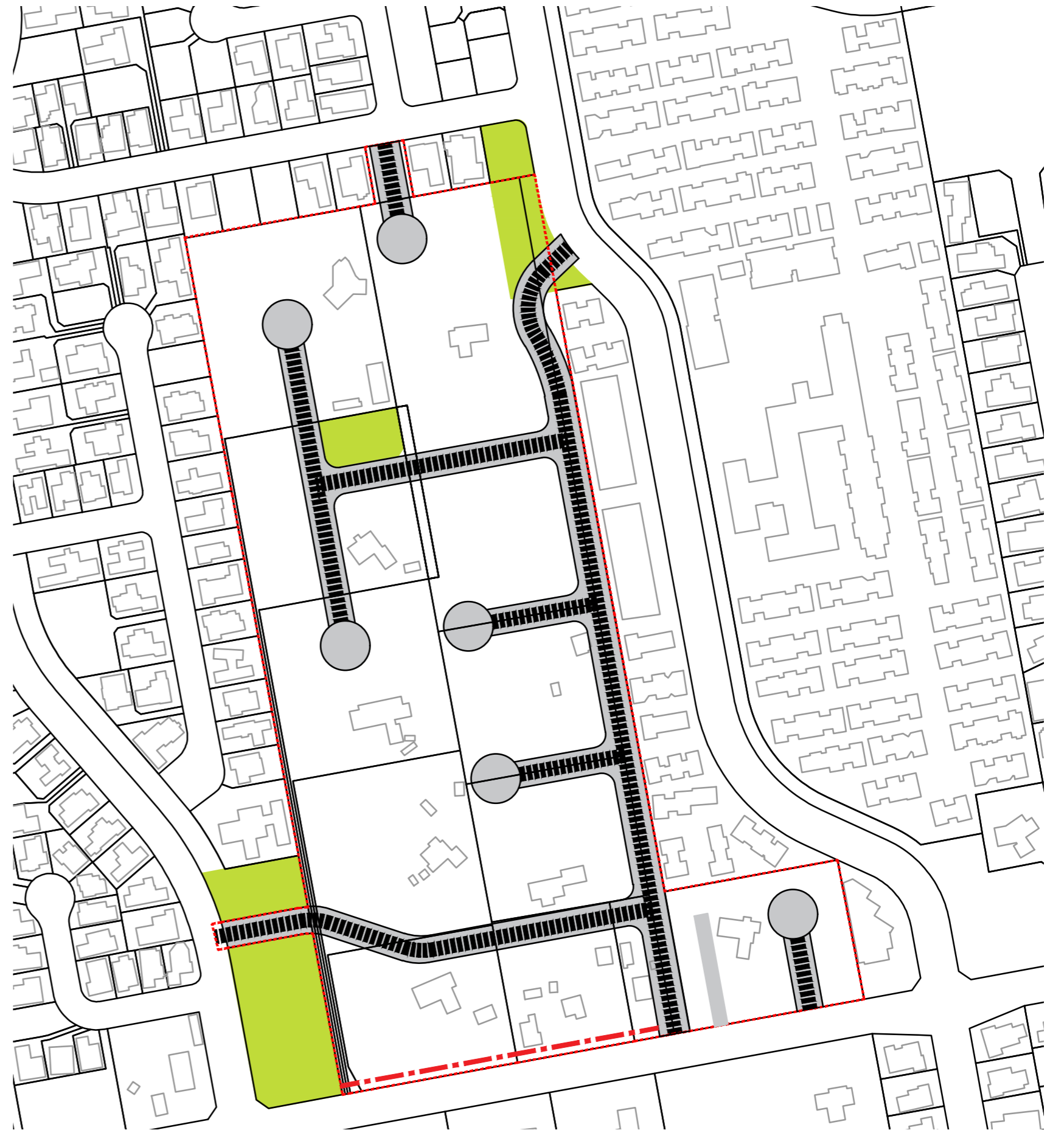
Approach 2

Formalising Brick Klin Lane approach providing north-south access on eastern side of ODP site.






- Three access of Oxford Road in close proximity, BKL + two on 7-Oxford Road
- Exit of BKL onto Charles Upham Drive
- 70 Oxford Road remains as per the consent
- Road connection through exiting Reserve to adjoin Westpark Boulevard opposite Brantholme Place
- Utilises vacant lot 7 on Chatsworth Ave for additional entry cul-de-sac
- Additional reserve space supporting existing reserve on corner of Chatsworth Ave and Charles Upham Drive
- One central neighbourhood reserve within the BKL ODP



Approach 2

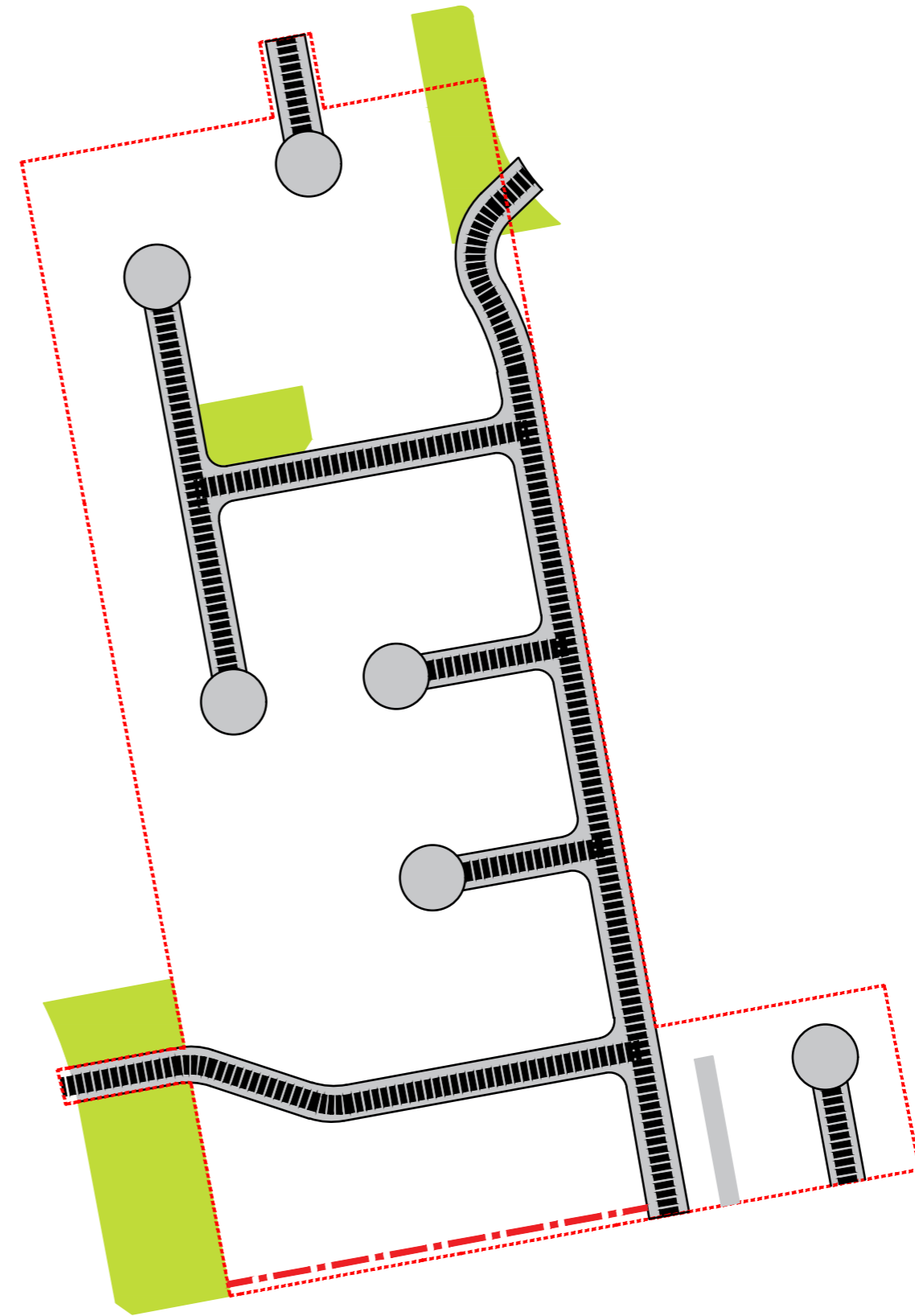


Legend

-  ODP Boundary
-  Restricted Access from Oxford Road
-  Local road centre line
-  Local road
-  Reserve open space provision



Approach 2



Legend

- ODP Boundary
- Restricted Access from Oxford Road
- Local road centre line
- Local road
- Reserve openspace provision

Appendix H. Rates postponement policy

WAIMAKARIRI DISTRICT COUNCIL

MEMO

FILE NO AND TRIM NO: RAT-03-02 / 240501069260
DATE: 19th April 2024
MEMO TO: Peter Wilson, Principal Policy Planner
FROM: Maree Harris, Customer Services Manager
SUBJECT: Rates Postponement Policy

Peter

Thanks for your enquiry regarding the Council's Rates Postponement Policy on Land subject to a District Plan change. In particular you are interested in how this might provide rates relief where property zoning changes due to District Plan implementation decisions cause significant increases to rateable values.

Timing

A district wide revaluation of the District for rating purposes occurs every three years. Waimakariri District is due for a revaluation in 2025.

New values are used for rating from the start of the next financial year, in this case 1 July 2026.

Between the three-yearly District valuation cycle, a valuation review for a particular property or group of properties could be triggered by a change in zoning.

Rating Valuations

Valuations for rating purposes are calculated on the highest and best use of a property which is not always the current use.

For example, if land is included in a development plan area or private plan change, this increased potential for development must be taken into account for the rating valuation even though the use of the land may still be a working farm.

The types of rates that are set and assessed on the property do not change due to a change in zoning, unless new services are connected, rates increases are generally driven by valuation increases.

Rates Postponement

The Rates Postponement Policy provides rates relief to ratepayers on land where the rating valuation has increased higher than the general market movement for that category of land due to its potential for development.

The policy is currently up for review in the 2024-2034 Long Term Plan.

For rates postponement, Council requests its Rating Valuation Service provider to provide special rating values that do not include any of the “potential” value that must be included in the Rating Valuation.

Rates are assessed on the current rating valuation and also on the special values. The ratepayer is required to pay the rates based on the special (lower) values, and the difference between this amount and the rates assessed on the current rating valuation is postponed for future payment.

The ratepayer will receive an annual rates assessment showing the full rates, the rates assessed on the special values and the amount postponed.

Rates are postponed for payment at a later date, generally when the property is sold. This is often when the additional value is realised.

A ratepayer may end the rates postponement at any time by paying the amount of postponed rates. There is no end-date written into the current policy. In the past, the longest period that rates postponement has continued for was 15 years.

Rates late payment penalties are not added to rates postponed due to a District Plan zone change and the current policy does not require interest to be paid on the amount postponed.

Remission of postponed rates

If the rates postponement extends beyond five years, a maximum of five years postponed rates is payable when the rates postponement period ends.

In the sixth year of rates postponement, the postponed rates from year one are automatically remitted by Council, leaving postponed rates from years two to six owing. In subsequent years as a new year’s postponed rates is added to the total, the oldest postponed rates are remitted.

Statutory Land Charge secures postponed rates

Postponed rates are secured by a charge over the rating unit where rates have been postponed. This charge is prepared and registered on the title by the Council’s Solicitor. The cost of preparing and registering the charge, and of releasing it in future, is met by the applicant.

Where a property is owned by more than one person, all owners must agree to and sign the application for postponed rates. As payment of rates is usually a condition of a mortgage, consent from any mortgagee that has an interest in the property must be obtained prior to rates postponement proceeding.

CULTURAL ADVICE REPORT

J6409 – Residential Rezoning

To: Waimakariri District Council

Contact: Peter Wilson

1.0 Mana Whenua Statement

Ngāi Tahu are tangata whenua of the Canterbury region and hold ancestral and contemporary relationships with Canterbury. The contemporary structure of Ngāi Tahu is set down through the Te Rūnanga o Ngāi Tahu Act 1996 (TRoNT Act). The TRoNT Act and Ngāi Tahu Claims Settlement Act (NTCSA) 1998 sets the requirements for recognition of tangata whenua in Canterbury.

The Te Rūnanga o Ngāi Tahu Act 1996 and the NTCSA 1998 gives recognition to the status of Papatipu Rūnanga as kaitiaki and mana whenua of the natural resources within their takiwā boundaries. Each Papatipu Rūnanga has their own respective takiwā, and each is responsible for protecting the tribal interests in their respective takiwā, not only on their own behalf of their own hapū, but again on behalf of the entire tribe.

Mahaanui Kurataiao Limited is owned by six Papatipu Rūnanga that represent the hapū who hold mana whenua rights over lands and waters within the takiwā from the Hurunui River to the Hakatere River and inland to Kā Tiritiri o Te Moana.

The following Rūnanga hold mana whenua over the project's location, as it is within their takiwā:

- Te Ngāi Tūāhuriri Rūnanga

2.0 Summary of Proposal

Waimakariri District Council proposes to rezone areas within the district for medium density residential development.

The following areas have been identified:

- Area 1 – Southeast Rangiora Development Area (SER)
- Area 2 – Northeast Rangiora Development Area (NER)
- Area 3 – West Rangiora Development Area
- Area 4 – Kaiapoi Development Area
- Area 5 – Woodend areas

Bellgrove North within Area 2 – Northeast Rangiora Development Area and Townsend Fields within the Southeast Rangiora Development Area haven been rezoned and are being developed.

The Waimakariri District Council provided mapped areas that are proposed for rezoning to medium density residential. Two of them (Bellgrove North within the NER area, and Townsend Fields in the SER area) have already been rezoned under Variation 1, have received subdivision and land use consent, and are being developed.

All of the areas are within the projected infrastructure boundary in Map A, CRPS. All of the areas apart from the Woodend area and the bottom part of Rangiora are future development areas, and have been proposed for residential development for many years.

Some of the areas are within 1 or more SASMs (sites of significance to Maori). The NER and SER areas are within the headwaters of the Cam/Ruataniwha river.

This report is provided as preliminary advice for Waimakariri District Council as part of plan change stage of development. It provides preliminary, general/non-specific, non-exhaustive guidance.

This report does not constitute a full assessment for all development but is provided to give assistance at the early stages of development. It is recommended that the Council request a more robust and site-specific assessment of development with each subdivision application.

Any consultation with Rūnanga at plan change stage does not eliminate the requirement for the consenting authority to consult with mana whenua at the application stage. More details and expert advice become available as part of this process.

4.0 Mahaanui Iwi Management Plan 2013

The Mahaanui Iwi Management Plan (IMP) is a written expression of kaitiakitanga, setting out how to achieve the protection of natural and physical resources according to Ngāi Tahu values, knowledge, and practices. The plan has the mandate of the six Papatipu Rūnanga, and is endorsed by Te Rūnanga o Ngāi Tahu, as the iwi authority.

Natural resources – water (waterways, waipuna (springs), groundwater, wetlands); mahinga kai; indigenous flora and fauna; cultural landscapes and land - are taonga to mana whenua and they have concerns for activities potentially adversely affecting these taonga. These taonga are integral to the cultural identity of ngā rūnanga mana whenua and they have a kaitiaki responsibility to protect them. The policies for protection of taonga that are of high cultural significance to ngā rūnanga mana whenua are articulated in the IMP.

The policies in this plan reflect what Papatipu Rūnanga support, require, encourage, or actions to be taken with regard to resolving issues of significance in a manner consistent with the protection and enhancement of Ngāi Tahu values, and achieving the objectives set out in the plan.

Key Policies of the IMP for developers to consider at design phase are provided below, however, the list is not exhaustive and relevant policies are not limited to those provided below:

5.1 KAITIAKITANGA

RECOGNITION OF MANAWHENUA

K1.3 Papatipu Rūnanga are the regional collective bodies representing the tāngata whenua who hold mana whenua, and are responsible for protecting hapū and tribal interests in their respective takiwā.

K1.4 For resource management issues in particular catchments or geographical areas set out in Part 6 of this IMP, engagement must occur with the appropriate Papatipu Rūnanga, as per the takiwā boundaries set out in:

(a) the Te Rūnanga o Ngāi Tahu (Declaration of Membership Act) Order 2001.

K1.7 Mahaanui Kurataiao Ltd is the Manawhenua Environmental Consultancy owned by Ngāi Tūāhuriri Rūnanga, Te Hapū o Ngāti Wheke (Rāpaki), Ōnuku Rūnanga, Koukourārata Rūnanga, Wairewa Rūnanga and Te Taumutu Rūnanga, and is mandated to engage in resource and environmental management processes on behalf of the six Papatipu Rūnanga.

***Comment:** Each Papatipu Rūnanga has their own respective takiwā, and each is responsible for protecting the tribal interests in their respective takiwā, not only on their own behalf of their own hapū, but again on behalf of the entire tribe. The Te Rūnanga o Ngāi Tahu Act 1996 and the NTCSA 1998 give recognition to the status of Papatipu Rūnanga as kaitiaki and mana whenua of the natural resources within their takiwā boundaries.*

5.2 RANGINUI

DISCHARGE TO AIR

R1.1 To protect the mauri of air from adverse effects associated with discharge to air activities.

***Comment:** As with other taonga, the mauri, or life supporting capacity, of air must be protected, and air must be used with respect and passed on to the next generation in a healthy state.*

5.3 WAI MĀORI

TĀNGATA WHENUA RIGHTS AND INTERESTS IN FRESHWATER

WM1.4 To require that local authorities and water governance bodies recognise that:

- (a) The relationship of tāngata whenua to freshwater is longstanding;
- (b) The relationship of tāngata whenua to freshwater is fundamental to Ngāi Tahu culture and cultural well-being;
- (c) Tāngata whenua rights and responsibilities associated with freshwater are intergenerational; and
- (d) Tāngata whenua interests in freshwater resources in the region are cultural, customary and economic in nature.

CHANGING THE WAY WATER IS VALUED

WM2.4 To continue to assert that the responsibility to protect and enhance mauri is collective, and is held by all those who benefit from the use of water; and that the right to take and use water is premised on the responsibility to safeguard and enhance the mauri of that the water.

WATER QUALITY

WM6.2 To require that water quality in the takiwā is of a standard that protects and provides for the relationship of Ngāi Tahu to freshwater. This means that:

- (a) The protection of the eco-cultural system is the priority, and land or resource use, or land use change, cannot impact on that system; and
- (b) Marae and communities have access to safe, reliable, and untreated drinking water; and
- (c) Ngāi Tahu and the wider community can engage with waterways for cultural and social well-being; and
- (d) Ngāi Tahu and the wider community can participate in mahinga kai/food gathering activities without risks to human health.

Discharges

WM6.8 To continue to oppose the discharge of contaminants to water, and to land where contaminants may enter water.

Controls on land use activities to protect water quality

WM6.16 To require, in the first instance, that all potential contaminants that may enter water (e.g. nutrients, sediments and chemicals) are managed on site and at source rather than discharged off site. This applies to both rural and urban activities.

Costs and benefits

WM6.23 To ensure that economic costs do not take precedence over the cultural, environmental and intergenerational costs of poor water quality.

WATER QUANTITY

Aquifers

WM8.6 To require that aquifers are recognised and protected as wāhi taonga. This means:

- (a) The protection of groundwater quality and quantity, including shallow aquifers;
- (b) The protection of aquifer recharge;
- (c) Ensuring a higher rate of recharge than abstraction, over the long term;
- (d) Continuing to improve our understandings of the groundwater resource, and the relationship between groundwater and surface water.

ACTIVITIES IN THE BEDS AND MARGINS OF RIVERS AND LAKES

Use and enhancement of river margins in the built/ urban environment

WM12.4 All waterways in the urban and built environment must have indigenous vegetated healthy, functioning riparian margins.

WM12.5 To require that all waterways in the urban and built environment have buffers or set back areas from residential, commercial or other urban activity that are:

- (a) At least 10 metres, and up to 30 metres; and

(b) Up to 50 metres where there is the space, such as towards river mouths and in greenfield areas.

WETLANDS, WAIPUNA AND RIPARIAN MARGINS

WM13.1 To recognise and protect all wetlands, waipuna and riparian areas as wāhi taonga that provide important cultural and environment benefits, including but not limited to:

- (a) Mahinga kai habitat;
- (b) The provision of resources for cultural use;
- (c) Cultural well-being;
- (d) The maintenance and improvement of water quality; and
- (e) Natural flood protection.

WM13.2 To protect, restore and enhance remaining wetlands, waipuna and riparian areas by:

- (a) Maintaining accurate maps of existing wetlands, waipuna and riparian margins;
- (b) Requiring that the drainage of existing wetlands or waipuna or the destruction or modification of existing native riparian areas be a prohibited activity;
- (c) Requiring the use of appropriate fencing, buffers and set back areas to protect wetlands, waipuna and riparian areas from intensive land use, including stock access and irrigation;
- (d) Supporting initiatives to restore wetlands, waipuna and riparian areas; and
- (e) Continuing to educate the wider community and landowners of the taonga value of these ecosystems.

DRAIN MANAGEMENT

WM14.1 To require that drains are managed as natural waterways and are subject to the same policies, objectives, rules and methods that protect Ngāi Tahu values associated with freshwater, including:

- (a) Inclusion of drains within catchment management plans and farm management plans;
- (b) Riparian margins are protected and planted;
- (c) Stock access is prohibited;
- (d) Maintenance methods are appropriate to maintaining riparian edges and fish passage; and
- (e) Drain cleaning requires a resource consent.

Comment: *Water and land should be managed as interrelated resources embracing the practice of Ki Uta Ki Tai, which recognises the connection between land, groundwater, surface water and coastal waters.*

5.4 PAPANUKU

URBAN AND TOWNSHIP PLANNING

P3.3 To require that the urban development plans and strategies as per Policy P3.2 give effect to the Mahaanui IMP and recognise and provide for the relationship of Ngāi Tahu and their culture and traditions with ancestral land, water and sites by:

- (a) Recognising Te Tiriti o Waitangi as the basis for the relationship between Ngāi Tahu and local government;
- (b) Recognising and providing for sites and places of importance to tāngata whenua;

- (c) Recognising and providing for specific values associated with places, and threats to those values;
- (d) Ensuring outcomes reflect Ngāi Tahu values and desired outcomes; and
- (e) Supporting and providing for traditional marae based communities to maintain their relationship with ancestral land.

SUBDIVISION AND DEVELOPMENT

Basic principles and design guidelines

P4.3 To base tāngata whenua assessments and advice for subdivision and residential land development proposals on a series of principles and guidelines associated with key issues of importance concerning such activities, as per Ngāi Tahu subdivision and development guidelines (see Appendix 1).

STORMWATER

P6.1 To require on-site solutions to stormwater management in all new urban, commercial, industrial and rural developments (zero stormwater discharge off site) based on a multi-tiered approach to stormwater management:

- (a) Education - engaging greater general public awareness of stormwater and its interaction with the natural environment, encouraging them to take steps to protect their local environment and perhaps re-use stormwater where appropriate;
- (b) Reducing volume entering system - implementing measures that reduce the volume of stormwater requiring treatment (e.g. rainwater collection tanks);
- (c) Reduce contaminants and sediments entering system - maximising opportunities to reduce contaminants entering stormwater e.g. oil collection pits in carparks, education of residents, treat the water, methods to improve quality; and
- (d) Discharge to land based methods, including swales, stormwater basins, retention basins, and constructed wetponds and wetlands (environmental infrastructure), using appropriate native plant species, recognising the ability of particular species to absorb water and filter waste.

SOIL CONSERVATION

P9.4 To support the following methods and measures to maintain or improve soil organic matter and soil nutrient balance, and prevent soil erosion and soil contamination:

- (a) Matching land use with land capability (i.e. soil type; slope, elevation);
- (b) Organic farming and growing methods;
- (c) Regular soil and foliage testing on farms, to manage fertiliser and effluent application levels and rates;
- (d) Stock management that avoids overgrazing and retires sensitive areas;
- (e) Restoration and enhancement of riparian areas, to reduce erosion and therefore sedimentation of waterways;
- (f) Restoration of indigenous vegetation, including the use of indigenous tree plantations as erosion control and indigenous species in shelter belts; and
- (g) Avoiding leaving large areas of land/soil bare during earthworks and construction activities.

CONTAMINATED LAND

P10.1 The management of contaminated land must recognise and provide for specific cultural issues, including:

- (a) The location of contaminated sites;
- (b) The nature of the contamination;
- (c) The potential for leaching and run-off;
- (d) Proposed land use changes; and
- (e) Proposed remediation or mitigation work.

EARTHWORKS

P11.1 To assess proposals for earthworks with particular regard to:

- (a) Potential effects on wāhi tapu and wāhi taonga, known and unknown;
- (b) Potential effects on waterways, wetlands and waipuna;
- (c) Potential effects on indigenous biodiversity;
- (d) Potential effects on natural landforms and features, including ridge lines;
- (e) Proposed erosion and sediment control measures; and
- (f) Rehabilitation and remediation plans following earthworks.

Indigenous vegetation

P11.8 To require the planting of indigenous vegetation as an appropriate mitigation measure for adverse impacts that may be associated earthworks activity.

Erosion and sediment control

P11.9 To require stringent and enforceable controls on land use and earthworks activities as part of the resource consent process, to protect waterways and waterbodies from sedimentation, including but not limited to:

- (a) The use of buffer zones;
- (b) Minimising the extent of land cleared and left bare at any given time; and
- (c) Capture of run-off, and sediment control.

Comment: *Development should occur in a manner that is consistent with land capability, the assimilative capacity of catchments and the limits and availability of water resources.*

5.5 TĀNE MAHUTA

MAHINGA KAI

TM1.3 To progressively enhance and restore mahinga kai resources and sites and the customary use traditions associated with such resources, by:

- (a) Integrating mahinga kai objectives and policy into regional planning and conservation management documents;
- (b) Continuing to develop Ngāi Tahu led restoration projects;
- (c) Creating Mahinga Kai Cultural Parks (see Box - Mahinga Kai Cultural Parks);
- (d) Organising wānanga, to teach our tamariki about our mahinga kai traditions; and

(e) Investigating mahinga kai opportunities for existing protected areas, proposed restoration projects and open place/reserve settings.

Ki Uta Ki Tai

TM1.4 To promote the principle of Ki Uta Ki Tai as a culturally appropriate approach to mahinga kai enhancement, restoration and management, in particular:

- (a) Management of whole ecosystems and landscapes, in addition to single species; and
- (b) The establishment, protection and enhancement of biodiversity corridors to connect species and habitats.

Remnant areas

TM1.7 To require that district and regional plans include policy and rules to protect, enhance and extend existing remnant wetlands, waipuna, riparian margins and native forest remnants in the takiwā given the importance of these ecosystems as mahinga kai habitat.

INDIGENOUS BIODIVERSITY

Ngāi Tahu interests in biodiversity

TM2.1 To require that local authorities and central government actively recognise and provide for the relationship of Ngāi Tahu with indigenous biodiversity and ecosystems, and interests in biodiversity protection, management and restoration, including but not limited to:

- (a) Importance of indigenous biodiversity to tāngata whenua, particularly with regard to mahinga kai, taonga species, customary use and valuable ecosystem services;
- (b) Recognition that special features of indigenous biodiversity (specific areas or species) have significant cultural heritage value for Ngāi Tahu;
- (c) Connection between the protection and restoration of indigenous biodiversity and cultural well-being;
- (d) Role of mātauranga Ngāi Tahu in biodiversity management; and
- (e) Role of Ngāi Tahu led projects to restoring indigenous biodiversity (e.g. Mahinga Kai Enhancement Fund; Kaupapa Kēreru).

Significance

TM2.4 To require that criteria for assessing the significance of ecosystems and areas of indigenous biodiversity recognise and provide for ecosystems, species and areas that are significant for cultural reasons.

Protection of remnant and restored areas

TM2.5 To require that city, district and regional plans include specific policy and rules to protect, enhance and extend existing remnant and restored areas of indigenous biodiversity in the takiwā.

Comment: *The protection and enhancement of indigenous biodiversity and mahinga kai occurs through a shared, coordinated effort between tāngata whenua, local authorities, conservation groups and communities.*

5.6 TANGAROA

COASTAL WATER QUALITY

TAN2.1 To require that coastal water quality is consistent with protecting and enhancing customary fisheries, and with enabling tāngata whenua to exercise customary rights to safely harvest kaimoana.

COASTAL WETLANDS, ESTUARIES AND HĀPUA

TAN3.2 To require that local authorities recognise and address the effects of catchment land use on the cultural health of coastal wetlands, estuaries and hāpua, particularly with regard to sedimentation, nutrification and loss of water.

Comment: The extent and cultural health of coastal wetlands, estuaries and lagoons has declined significantly as a result of both urban and rural land use, and this has had a marked impact on mahinga kai resources and opportunities. The intrinsic and cultural value of these ecosystems requires an immediate and effective response to issues such as wastewater and stormwater discharges, sedimentation and nutrient run off.

5.8 NGĀ TŪTOHU WHENUA

RECOGNISING CULTURAL LANDSCAPES

CL1.1 To require that local and central government recognise and provide for the ability of tāngata whenua to identify particular landscapes as significant cultural landscapes, reflecting:

- (a) Concentration, distribution and nature of wāhi tapu and wāhi taonga;
- (b) Setting within which sites occur and significance of that setting;
- (c) Significance with regard to association and relationship to place; and
- (d) Degree of risk/threat.

Protecting and restoring cultural landscapes

CL1.8 To identify opportunities to enhance cultural landscapes, including but not limited to:

- (a) Restoration/enhancement of indigenous biodiversity;
- (b) Enhancing views and connections to landscape features;
- (c) Appropriate and mandated historical interpretation;
- (d) Setting aside appropriate areas of open space within developments; and
- (e) Use of traditional materials, design elements and artwork.

WĀHI TAPU ME WĀHI TAONGA

CL3.1 All taonga within the takiwā of Ngāi Tahu, accidental discovery or otherwise, belong to the Papatipu Rūnanga/ Te Rūnanga o Ngāi Tahu.

CL3.9 To support a range of methods to protect sites identified as wāhi tapu and wāhi taonga, including but not limited to:

- (a) Registration with Historic Places Trust as wāhi tapu or wāhi tapu area; (b) Covenants (e.g. heritage, open space);

- (c) Heritage orders;
- (d) Designation as Historic Reserve or local purpose reserve, under the Reserves Act 1977;
- (e) Tribally developed 'hot zones', Heritage Risk Models or Heritage Alert Layers to protect wāhi tapu, wāhi taonga and archaeological sites; and
- (f) Methods to protect and restore cultural landscapes, as per Policy CL1.7.

Comment: *Wāhi tapu and wāhi taonga are sites and places that are culturally and spiritually significant to tāngata whenua history and identity, and include sites such as urupā, pā, midden, umu, urupā, tauranga waka, and places where taonga have been found. The relationship of Māori with wāhi tapu and wāhi taonga is a matter of national importance in the RMA (section 6 (f) and (e)).*

4.1 Guidance to Moderate Impacts on Cultural Values

The above policies from the Mahaanui IMP provide a framework for providing guidance at the plan change phase of development.

- Area 1 – South East Rangiora Development Area
- Area 2 – North East Rangiora Development Area
- Area 3 – West Rangiora Development Area
- Area 4 – Kaiapoi Development Area
- Area 5 – Woodend areas

There are particular cultural sensitivities with regards to residential development in the eastern areas of the district. The concerns are associated with the cultural landscape, groundwater levels, waterways, mahinga kai values and taonga species.

Te Ngāi Tūāhuriri Rūnanga are opposed to the rezoning of Area 4 – Kaiapoi Development Area. The scale of the proposed rezoning area is considerable, and the site is within a culturally sensitive area. This is identified by the SASM002 and SASM013 overlays within the District Plan. The site is also within the Ashley Estuary (Te Aka Aka) and Coastal Protection Zone. The area is identified as a historical wetland area within Black Maps and many wetland type features and waipuna (springs) have been lost due to the development that has occurred adjacent to this area. These features provide habitat for indigenous/taonga species and are remnants of the pre-European landscape.

There are concerns regarding Area 1 – Southeast Rangiora Development Area, however, it is acknowledged that this area has been rezoned and is currently being developed.

Area 5 – Woodend areas are of smaller scale and are viewed as within areas currently being developed for residential development.

For areas 1, 2, 3 and 5 the following paragraphs are provided for cultural context associated with recommendations.

As per policy WM13.1 and WM13.2 all wetlands, waipuna and riparian areas are wāhi taonga. It is critical that existing wetlands, waipuna and riparian areas are protected, maintained or enhanced, degraded areas are restored, and opportunities taken to re-establish wāhi taonga across the landscape. As such, they should be identified, protected and enhanced. A survey for springs should be undertaken by a suitably qualified expert to determine whether any springs whether permanent or seasonal are within the site. Subdivision design should include appropriate setbacks and riparian

buffer zones planted with indigenous species. Waterways should be retained in their natural or existing form.

Drains are a common feature across Ngā Pākihi Whakatekateka o Waitaha, given that much of the land in lower catchment areas was originally swamp. An extensive network of drains provides flood protection for settlement and land use. Some of these drains are modified natural waterways, and many connect or empty into existing waterways and waterbodies. For this reason, drain management is an important kaupapa for tāngata whenua. While drains may not be highly valued in the wider community, drains that function as mahinga kai habitat and where mahinga kai resources are gathered may be identified as wāhi taonga by Ngāi Tahu. Waterways considered drains (or other description, such as, ephemeral water courses) should be provided the same mana as any other waterway.

As per policy WM12.5 there should be a minimum riparian buffer of 10 metres and up to 50 metres for waterways.

The developer should undertake a preliminary assessment to determine whether there is publicly available information to identify culturally sensitive areas within the site. Where a culturally sensitive area is identified, the developer should provide suitable protection and enhancement measures.

Low impact design methods are encouraged, such as, onsite stormwater management, good management practices for earthworks, encouraging efficient water usage and waste minimisation, and incorporating indigenous planting in landscape plans. Refer to Ngāi Tahu Subdivision and Development Guidelines (Appendix 1) for low impact design methods endorsed by mana whenua. Stormwater should be treated prior to discharge whether to ground or to the Council's reticulated network.

Earthworks should be minimised and managed to avoid damaging sites of significance or causing erosion and sediment issues. Any activity that involves ground disturbance has the potential to uncover cultural material or wāhi tapu. As a minimum, an accidental discovery protocol should be place during all earthworks.

Contaminated land can have adverse effects on the environment, including the potential for contaminants to leach into groundwater. Contaminated land can also have effects on Ngāi Tahu cultural associations. Contaminated land should be remediated, and no contaminated material should remain on the site. All contaminated material should be removed and disposed of at a licensed facility.

Shallow depth to groundwater and earthworks over an aquifer is of concern. This often generates sediment laden water which should be treated prior to discharge. There are concerns about residual chemicals associated with the use of flocculants and coagulants. There are also concerns regarding earthworks over an aquifer as this can cause contamination of groundwater and surface water.

Constructability issues should be considered at the design phase as earthworks over shallow aquifers is becoming more common. This can have cultural impacts particularly where there are contaminated soils on the site.

Restoring indigenous biodiversity values is one of the most important challenges for the future management in the takiwā. A healthy economy relies on a healthy environment. Indigenous biodiversity, along with air, water and soil, are taonga; they are the region's natural capital, providing a suite of essential ecosystem services. Although these services are often taken for granted, they have immense value to cultural, social and economic wellbeing. It is recommended that the site is surveyed by a suitably qualified person to determine whether there are taonga species within the site should be protected.

The whole of the Canterbury region has cultural landscape value: Ngāi Tahu travelled through, engaged with and named the land, and tāngata whenua history is part of the landscape. However, within this landscape of Ngāi Tahu land use and occupancy particular areas are identified as cultural landscapes. A cultural landscape is a geographical area with particular (and often related) traditional, historical, spiritual and ecological value to Ngāi Tahu. An area may be identified as a cultural landscape due to the concentration of values in a particular location, the particular importance of the area to Ngāi Tahu cultural, history or identity, or the need to manage an area as a particular landscape unit. Cultural landscapes are integral to Ngāi Tahu culture, identity and history, and are testament to relationship of tāngata whenua with the land over time. They are intergenerational: providing future generations (our tamariki and mokopuna) the opportunity to experience and engage with the landscape as their tūpuna once did.

5.0 Rūnanga – Affected Party or Not

This report is a preliminary assessment against the Mahaanui Iwi Management Plan to provide Council with guidance to the cultural impact of proposed rezoning of Areas 1, 2, 3, 4 and 5 identified.

This report does not constitute a full assessment of cultural impacts for each development, and it is recommended that the Council ensures that a full assessment is undertaken on a site-by-site basis.

Te Ngāi Tūāhuriri Rūnanga are opposed to the rezoning of Area 4 – Kaiapoi Development Area and consider themselves an affected party in relation to the proposed rezoning of this area. The scale of the proposed rezoning area is considerable, and the site is within a culturally sensitive area. This is identified by the SASM002 and SASM013 overlays within the District Plan. The site is also within the Ashley Estuary (Te Aka Aka) and Coastal Protection Zone. The area is identified as a historical wetland area within Black Maps and many wetland type features and waipuna (springs) have been lost due to the development that has occurred adjacent to this area. These features provide habitat for indigenous/taonga species and are remnants of the pre-European landscape.

The Kaitiaki representatives of Te Ngāi Tūāhuriri Rūnanga have reviewed the proposed rezoning for areas 1, 2, 3 and 5, and provided the recommendations outlined in Section 6.0 to align these proposals more closely with the provisions in the Mahaanui IMP. **If the recommendations are provided for, the Rūnanga will not consider themselves to be an adversely affected party.**

Subdivision and development can provide an opportunity to enhance the urban environment. It is recommended that the design provides consideration of cultural landscape, and as an ecosystem

within a larger ecosystem. The inclusion of greenspaces, indigenous habitat and biodiversity corridors is encouraged.

For areas 1, 2, 3 and 5 further engagement with mana whenua is required on a site by site basis. Mahaanui Kurataiao Ltd reserves the right to update the recommendations when Te Ngāi Tūāhuriri Rūnanga provide feedback for each development within the proposed areas 1, 2, 3 and 5, as consultation with Rūnanga at pre-application stage does not eliminate the requirement for the consenting authority to consult with mana whenua at the application stage. More details and expert advice become available as part of this process.


6.0 Recommendations

For area 5, no recommendations are provided as there are no measures deemed suitable to mitigate the effects of the proposed activity on mana whenua values.

The following recommendations are provided to moderate impacts of development on mana whenua values for areas 1, 2, 3 and 5:

1. Waterways should be protected and enhanced with suitable setbacks and riparian buffers planted with indigenous species (see policy WM12.5).
2. There should be a survey undertaken to identify springs and/or wetlands on the site. This should be undertaken by a suitably qualified expert. Springs and wetlands should be protected and enhanced with suitable setbacks and indigenous riparian planting.
3. Areas identified as culturally sensitive should be protected and enhanced. Consultation with the Papatipu Rūnanga may be required to determine culturally appropriate methods of enhancement.
4. Low impact design methods, such as, the use of rain and greywater collection and re-use systems, and minimising impervious surface area is encouraged. Refer to Ngāi Tahu Subdivision and Development Guidelines (Appendix 1) for low impact design methods endorsed by mana whenua.
5. Contaminated sites should be remediated. All contaminated material should be removed from the site and disposed of at a licensed facility.
6. Measures to minimise earthworks should be considered at the design phase of development.
7. Earthworks in areas with shallow depth to groundwater and/or over an aquifer can have significant cultural impacts and are of concern.
8. The site should be surveyed by a suitably qualified person(s) to determine whether there are taonga species within the site that need to be protected.
9. Refer to Ngāi Tahu Subdivision and Development Guidelines (Appendix 1) for guidance on stormwater, water supply and wastewater servicing.

Note: The list of recommendations is preliminary, general/non-specific and non-exhaustive and is provided as preliminary guidance only.



On behalf of Mahaanui Kurataiao Ltd, this report has been prepared by Kelly Sunnex | Mahaanui Kurataiao Ltd Environmental Advisor, and peer reviewed by Henrietta Carroll | Mahaanui Kurataiao Ltd Kaihautū.

Date: 30 April 2024

Appendix 1: Ngāi Tahu Subdivision and Development Guidelines

Note: These guidelines are to be read in conjunction with Policies P4.1, P4.2 and P4.3 within the Mahaanui IMP.

Cultural landscapes

- 1.1 A cultural landscape approach is the most appropriate means to identify, assess and manage the potential effects of subdivision and development on cultural values and significant sites [refer Section 5.8 Issue CL1].
- 1.2 Subdivision and development that may impact on sites of significance is subject Ngāi Tahu policy on Wāhi tapu me wāhi taonga and Silent Files (Section 5.8, Issues CL3 and CL4).
- 1.3 Subdivision and development can provide opportunities to recognise Ngāi Tahu culture, history and identity associated with specific places, and affirm connections between tāngata whenua and place, including but not limited to:
 - (i) Protecting and enhancing sites of cultural value, including waterways;
 - (ii) Using traditional Ngāi Tahu names for street and neighborhood names, or name for developments;
 - (iii) Use of indigenous species as street trees, in open space and reserves;
 - (iv) Landscaping design that reflects cultural perspectives, ideas and materials;
 - (v) Inclusion of interpretation materials, communicating the history and significance of places, resources and names to tāngata whenua; and
 - (vi) Use of tāngata whenua inspired and designed artwork and structures.

Stormwater

- 2.1 All new developments must have on-site solutions to stormwater management (i.e. zero stormwater discharge off site), based on a multi-tiered approach to stormwater management that utilises the natural ability of Papatūānuku to filter and cleanse stormwater and avoids the discharge of contaminated stormwater to water [refer to Section 5.4, Policy P6.1].
- 2.2 Stormwater swales, wetlands and retention basins are appropriate land based stormwater management options. These must be planted with native species (not left as grass) that are appropriate to the specific use, recognising the ability of particular species to absorb water and filter waste.
- 2.3 Stormwater management systems can be designed to provide for multiple uses. For example, stormwater management infrastructure as part of an open space network can provide amenity values, recreation, habitat for species that were once present on the site, and customary use.
- 2.4 Appropriate and effective measures must be identified and implemented to manage stormwater run off during the construction phase, given the high sediment loads that stormwater may carry as a result of vegetation clearance and bare land.

2.5 Councils should require the upgrade and integration of existing stormwater discharges as part of stormwater management on land rezoned for development.

2.6 Developers should strive to enhance existing water quality standards in the catchment downstream of developments, through improved stormwater management.

Earthworks

3.1 Earthworks associated with subdivision and development are subject to the general policy on Earthworks (Section 5.4 Issue P11) and Wāhi tapu me wāhi taonga (Section 5.8, Issue CL3), including the specific methods used in high and low risk scenarios for accidental finds and damage to sites of significance.

3.2 The area of land cleared and left bare at any time during development should be kept to a minimum to reduce erosion, minimise stormwater run off and protect waterways from sedimentation.

3.3 Earthworks should not modify or damage beds and margins of waterways, except where such activity is for the purpose of naturalisation or enhancement.

3.4 Excess soil from sites should be used as much as possible on site, as opposed to moving it off site. Excess soil can be used to create relief in reserves or buffer zones.

Water supply and use

4.1 New developments should incorporate measures to minimise pressure on existing water resources, community water supplies and infrastructure, including incentives or requirements for:

- (i) low water use appliances and low flush toilets;
- (ii) grey water recycling; and
- (iii) rainwater collection.

4.2 Where residential land development is proposed for an area with existing community water supply or infrastructure, the existing supply or infrastructure must be proven to be able to accommodate the increased population prior to the granting of subdivision consent.

4.3 Developments must recognise, and work to, existing limits on water supply. For example, where water supply is an issue, all new dwellings should be required to install rainwater collection systems.

Waste treatment and disposal

5.1 Developments should implement measures to reduce the volume of waste created within the development, including but not limited incentives or requirements for:

- (i) Low water use appliances and low flush toilets;
- (i) Grey water recycling; and
- (ii) Recycling and composting opportunities (e.g. supporting zero waste principles).

5.2 Where a development is proposed for an area with existing wastewater infrastructure, the infrastructure must be proven to be able to accommodate the increased population prior to the granting of the subdivision consent.

5.3 New rural residential or lifestyle block developments should connect to a reticulated sewage network if available.

5.4 Where new wastewater infrastructure is required for a development:

(i) The preference is for community reticulated systems with local treatment and land based discharge rather than individual septic tanks; and

(ii) Where individual septic tanks are used, the preference is a wastewater treatment system rather than septic tanks.

Design guidelines

6.1 New developments should incorporate low impact urban design and sustainability options to reduce the development footprint on existing infrastructure and the environment, including sustainable housing design and low impact and self sufficient solutions for water, waste, energy such as:

(i) Position of houses to maximise passive solar gain;

(ii) Rainwater collection and greywater recycling;

(iii) Low energy and water use appliances;

(iv) Insulation and double glazing; and

(v) Use of solar energy generation for hot water.

6.2 Developers should provide incentives for homeowners to adopt sustainability and self sufficient solutions as per 6.1 above.

6.3 Urban and landscape design should encourage and support a sense of community within developments, including the position of houses, appropriately designed fencing, sufficient open spaces, and provisions for community gardens.

6.4 Show homes within residential land developments can be used to showcase solar hot water, greywater recycling and other sustainability options, and raise the profile of low impact urban design options.

Landscaping and open space

7.1 Sufficient open space is essential to community and cultural wellbeing, and the realization of indigenous biodiversity objectives, and effective stormwater management.

7.2 Indigenous biodiversity objectives should be incorporated into development plans, consistent with the restoration and enhancement of indigenous biodiversity on the landscape.

7.3 Indigenous biodiversity objectives to include provisions to use indigenous species for:

(i) street trees;

(ii) open space and reserves;

(iii) native ground cover species for swales;

- (iv) stormwater management network; and
- (v) home gardens.

7.4 Indigenous species used in planting and landscaping should be appropriate to the local environment, and where possible from locally sourced seed supplies.

7.5 Options and opportunities to incorporate cultural and/or mahinga kai themed gardens in open and reserve space can be considered in development planning (e.g. pā harakeke as a source of weaving materials; reserves planted with tree species such as mātai, kahikatea and tōtara could be established with the long term view of having mature trees available for customary use).

7.6 Developers should offer incentives for homeowners to use native species in gardens, including the provision of lists of recommended plants to avoid, discounts at local nursery, and landscaping ideas using native species.

CULTURAL ADVICE REPORT

J6442 - STOKES LAND (NORTH WOODEND)

To: Waimakariri District Council

Contact: Peter Wilson

1.0 Mana Whenua Statement

Ngāi Tahu are tangata whenua of the Canterbury region and hold ancestral and contemporary relationships with Canterbury. The contemporary structure of Ngāi Tahu is set down through the Te Rūnanga o Ngāi Tahu Act 1996 (TRoNT Act). The TRoNT Act and Ngāi Tahu Claims Settlement Act (NTCSA) 1998 sets the requirements for recognition of tangata whenua in Canterbury.

The Te Rūnanga o Ngāi Tahu Act 1996 and the NTCSA 1998 gives recognition to the status of Papatipu Rūnanga as kaitiaki and mana whenua of the natural resources within their takiwā boundaries. Each Papatipu Rūnanga has their own respective takiwā, and each is responsible for protecting the tribal interests in their respective takiwā, not only on their own behalf of their own hapū, but again, on behalf of the entire tribe.

The following Rūnanga hold mana whenua over the project's location, as it is within their takiwā:

- Ngāi Tūāhuriri Rūnanga

2.0 Summary of Proposal

Waimakariri District Council is proposing to rezone the Stokes Land (North Woodend) area to Medium Density Residential and Large Lot Residential

Medium Density Residential means that up to three dwellings of three stories can be developed without a resource consent if other rules and standards have been met.

Large Lot Residential generally provides for a density of one residence every 4000 m².

The proposed site is located within the SF017 – Pekapeka Silent File Area.

3.0 Consultation Methodology

Mahaanui Kurataiao Limited review the application documents and undertake an assessment of the application against the Mahaanui Iwi Management Plan.

A briefing report is prepared for Kaitiaki representatives who have been mandated by the Papatipu Rūnanga they represent to speak on behalf of hapū on environmental issues.

A Mahaanui Kurataiao Limited staff member meets with Kaitiaki representatives to discuss the application and Kaitiaki provide feedback based on Mātauranga Māori.

The Cultural Advice Report is provided to outline the relevant policies in the Mahaanui Iwi Management Plan and the feedback provided by Kaitiaki representatives.

The relevant policies and Kaitiaki feedback for this application are provided in the following sections of this report.

4.0 Mahaanui Iwi Management Plan 2013

The Mahaanui Iwi Management Plan (IMP) is a written expression of kaitiakitanga, setting out how to achieve the protection of natural and physical resources according to Ngāi Tahu values, knowledge, and practices. The plan has the mandate of the six Papatipu Rūnanga, and is endorsed by Te Rūnanga o Ngāi Tahu, as the iwi authority.

Natural resources – water (waterways, waipuna (springs), groundwater, wetlands); mahinga kai; indigenous flora and fauna; cultural landscapes and land - are taonga to mana whenua and they have concerns for activities potentially adversely affecting these taonga. These taonga are integral to the cultural identity of ngā rūnanga mana whenua and they have a kaitiaki responsibility to protect them. The policies for protection of taonga that are of high cultural significance to ngā rūnanga mana whenua are articulated in the IMP.

The policies in this plan reflect what Papatipu Rūnanga support, require, encourage, or actions to be taken with regard to resolving issues of significance in a manner consistent with the protection and enhancement of Ngāi Tahu values, and achieving the objectives set out in the plan.

The relevant Policies of the IMP to this proposal have been identified as:

5.1 KAITIAKITANGA

TE TIRITI O WAITANGI

K2.3 In giving effect to Te Tiriti, government agencies and local authorities must recognise and provide for kaitiakitanga and rangatiratanga. As the tāngata whenua who hold manawhenua, Ngāi Tahu interests in resource management extend beyond stakeholder or community interests.

Comment: *Kaitiakitanga is fundamental to the relationship between Ngāi Tahu and the environment. Te Tiriti o Waitangi guarantees tāngata whenua the right to fulfill their kaitiaki obligations to protect and care for taonga in the environment, including land, waterways, natural features, wāhi tapu and flora and fauna with tribal areas.*

5.3 WAI MĀORI

TĀNGATA WHENUA RIGHTS AND INTERESTS IN FRESHWATER

WM1.1 Ngāi Tahu, as tāngata whenua, have specific rights and interests in how freshwater resources should be managed and utilised in the takiwā.

CHANGING THE WAY WATER IS VALUED

WM2.3 To require that decision making is based on intergenerational interests and outcomes, mō tātou, ā, mō kā uri ā muri ake nei.

WATER QUALITY

WM6.1 To require that the improvement of water quality in the takiwā is recognised as a matter of regional and immediate importance.

Controls on land use activities to protect water quality

WM6.17 To require the development of stringent and enforceable controls on the following activities given the risk to water quality:

- (a) Intensive rural land use (see Issue WM.7);
- (b) Subdivision and development adjacent to waterways;
- (c) Discharge to land activities associated with industry;

Costs and benefits

WM6.22 To require that local authorities afford appropriate weight to tāngata whenua values when assessing the costs and benefits of activities that may have adverse effects on water quality.

WM6.23 To ensure that economic costs do not take precedence over the cultural, environmental and intergenerational costs of poor water quality.

Cumulative effects

WM7.14 To require that the effects of land use activities on water quality and quantity are assessed with due regard to the cumulative effects of all land use in the catchment and as well as of individual consents.

ACTIVITIES IN THE BEDS AND MARGINS OF RIVERS AND LAKES

Riparian areas

WM12.2 To require the protection and restoration of native riparian vegetation along waterways and lakes in the takiwā as a matter of priority, and to ensure that this can occur as a permitted activity. Use and enhancement of river margins in the built/ urban environment

WM12.4 All waterways in the urban and built environment must have indigenous vegetated healthy, functioning riparian margins.

WM12.5 To require that all waterways in the urban and built environment have buffers or set back areas from residential, commercial or other urban activity that are:

- (a) At least 10 metres, and up to 30 metres; and
- (b) Up to 50 metres where there is the space, such as towards river mouths and in greenfield areas.

WM12.7 To require all esplanade reserves and esplanade strips established on subdivisions to incorporate native riparian planting.

***Comment:** Water is a significant cultural resource, connecting Ngāi Tahu to the landscape, culture, and traditions of the tūpuna. Wai is a taonga, and a life giver of all things. The protection and enhancement of wai is, therefore, of upmost importance to tāngata whenua. The RMA recognises the relationship of Māori to freshwater as a matter of national importance.*

5.4 PAPANUKU

URBAN AND TOWNSHIP PLANNING

P3.2 To ensure early, appropriate and effective involvement of Papatipu Rūnanga in the development and implementation of urban and township development plans and strategies, including but not limited to:

- (a) Urban development strategies;
- (b) Plan changes and Outline Development Plans;
- (c) Area plans;
- (d) Urban planning guides, including landscape plans, design guides and sustainable building guides;
- (e) Integrated catchment management plans (ICMP) for stormwater management;
- (f) Infrastructure and community facilities plans, including cemetery reserves; and
- (g) Open space and reserves planning.

P3.3 To require that the urban development plans and strategies as per Policy P3.2 give effect to the Mahaanui IMP and recognise and provide for the relationship of Ngāi Tahu and their culture and traditions with ancestral land, water and sites by:

- (a) Recognising Te Tiriti o Waitangi as the basis for the relationship between Ngāi Tahu and local government;
- (b) Recognising and providing for sites and places of importance to tāngata whenua;
- (c) Recognising and providing for specific values associated with places, and threats to those values;
- (d) Ensuring outcomes reflect Ngāi Tahu values and desired outcomes; and
- (e) Supporting and providing for traditional marae based communities to maintain their relationship with ancestral land

SUBDIVISION AND DEVELOPMENT

Processes

P4.1 To work with local authorities to ensure a consistent approach to the identification and consideration of Ngāi Tahu interests in subdivision and development activities, including:

- (a) Encouraging developers to engage with Papatipu Rūnanga in the early stages of development planning to identify potential cultural issues; including the preparation of Cultural Impact Assessment reports;
- (b) Ensuring engagement with Papatipu Rūnanga at the Plan Change stage, where plan changes are required to enable subdivision;
- (c) Requiring that resource consent applications assess actual and potential effects on tāngata whenua values and associations;
- (d) Ensuring that effects on tāngata whenua values are avoided, remedied or mitigated using culturally appropriate methods;
- (e) Ensuring that subdivision consents are applied for and evaluated alongside associated land use and discharge consents; and
- (f) Requiring that 'add ons' to existing subdivisions are assessed against the policies in this section.

Basic principles and design guidelines

P4.3 To base tāngata whenua assessments and advice for subdivision and residential land development proposals on a series of principles and guidelines associated with key issues of importance concerning such activities, as per Ngāi Tahu subdivision and development guidelines.

Comment: *Papatūānuku is the birthplace of all things of the world and the place to which they return. Subdivision and development activities can compromise the mauri of the land and the life it supports if not managed appropriately. Subdivision and development activities must implement low impact, innovative, and sustainable solutions to water, stormwater, and energy issues.*

5.8 NGĀ TŪTOHU WHENUA

RECOGNISING CULTURAL LANDSCAPES

CL1.2 To require that local and central government give effect to cultural landscapes in policy, planning and decision making processes as a tool to:

- (a) Enable holistic assessment of effects on cultural values;
- (b) Recognise the relationship of Ngāi Tahu to particular areas and sites; and
- (c) Provide a wider context for cultural heritage management and the protection of individual sites.

CL1.6 To require that known Māori archaeological sites and silent files are recognised and provided for as cultural landscape indicators.

Protecting and restoring cultural landscapes

CL1.8 To identify opportunities to enhance cultural landscapes, including but not limited to:

- (a) Restoration/enhancement of indigenous biodiversity;
- (b) Enhancing views and connections to landscape features;
- (c) Appropriate and mandated historical interpretation;
- (d) Setting aside appropriate areas of open space within developments; and
- (e) Use of traditional materials, design elements and artwork.

WĀHI TAPU ME WĀHI TAONGA

CL3.8 To require, where a proposal is assessed by tāngata whenua as having the potential to affect wāhi tapu or wāhi taonga, one or more of the following:

- (a) Low risk to sites:
 - (i) Accidental discovery protocol (ADP)

SILENT FILES

CL4.4 The Silent File designation means that:

- (a) There must be a high level of engagement with Papatipu Rūnanga to assess whether the location, type and scale of proposed activities may adversely effect the values associated with the Silent File area;
- (b) The Papatipu Rūnanga shall have a high level of influence over decisions to grant or decline consents. Only tāngata whenua can determine whether a development will affect silent file value; and
- (c) The Papatipu Rūnanga shall not be required to justify the nature and extent of cultural effects, or why an activity may be inconsistent with values in a Silent File area. Tāngata whenua must be able to “say no” without revealing the location or status of a site.

***Comment:** For Ngāi Tahu cultural heritage isn't something that happened in the past; but rather a reflection of an ongoing and enduring relationship with the land. As a planning tool, cultural landscapes are a culturally meaningful and effective framework for the identification, protection and management of sites and places of significance, the multiple values associated with those sites and places, and the relationship of tāngata whenua to them.*

4.1 Guidance to Moderate Impacts on Cultural Values

The above policies from the Mahaanui IMP provide a framework for assessing the potential negative impacts of the proposed activity on cultural values and provide guidance on how these effects can be moderated.

There are particular cultural sensitivities with regards to residential development in the eastern areas of the Waimakariri district. The concerns are associated with the cultural landscape, groundwater levels, waterways, mahinga kai values and taonga species. The rezoning request and future development of Stokes Land must be advanced with a cultural landscape approach. A cultural landscape approach enables a holistic identification and assessment of sites of significance, and other values of importance such as waterways, wetlands and waipuna.

A cultural landscape is a geographical area with particular (and often related) traditional, historical, spiritual and ecological value to Ngāi Tahu. An area may be identified as a cultural landscape due to the concentration of values in a particular location, the particular importance of the area to Ngāi Tahu cultural, history or identity, or the need to manage an area as a particular landscape unit. A cultural landscape approach shifts the focus from individual sites (e.g. New Zealand Archaeological Association or NZAA site) to the wider setting or context of a site - the relationship and linkages of the site to the area and other landscape features. The future development must incorporate and protect natural characteristics of the landscape. Areas identified as culturally sensitive should be protected

and enhanced. Consultation with the Papatipu Rūnanga may be required to determine culturally appropriate methods of enhancement.

The decline in water quality in the takiwā is a result of the continuing practice of using water as a receiving environment for the discharge of contaminants and waste. This along with unsustainable rural and urban land use is one of the most significant natural resource issues for tāngata whenua. Te Ngāi Tūāhuriri Rūnanga require that waterbodies (waterways, springs, etc, including ephemeral waterways and drains) be retained and incorporated into the design of development associated with this land re-zoning request. Changing the way water resources are valued must underpin and drive the changes needed in the way freshwater resources are managed and used.

Waterways should be protected and enhanced with suitable setbacks and riparian buffers planted with indigenous species. As per policy WM12.5 of the Iwi Management Plan, to require that all waterways in the urban and built environment have buffers or set back areas from residential, commercial, or other urban activity that are at least 10 metres, and up to 30 metres; and up to 50 metres where there is the space, such as towards river mouths and in greenfield areas. Moreover, cultural health assessments in the takiwā highlight that one of the greatest issues facing waterways is the absence of sufficient riparian margins to buffer those waterways from intensive land use and provide habitat for mahinga kai and indigenous species.

Indigenous biodiversity, and the landscapes and ecosystems that support it, is a fundamental part of the culture, identity and heritage of Ngāi Tahu, particularly with regard to mahinga kai and the connection between people and place through resource use. Restoring indigenous biodiversity values is one of the most important challenges for the future management in the takiwā. A healthy economy relies on a healthy environment. Mature native trees onsite must be retained and incorporated into future subdivision design. The site should also be surveyed by a suitably qualified person(s) to determine whether there are taonga species within the site that need to be protected.

Wetlands, waipuna and riparian areas are all considered to be wāhi taonga by Ngāi Tahu, treasured for their role in protecting and enhancing mauri, as providing habitat for mahinga kai. There should be a survey undertaken to identify springs and/or wetlands on the site. This should be undertaken by a suitably qualified expert. Springs and wetlands should be protected and enhanced with suitable setbacks and indigenous riparian planting.

Low impact design methods, such as, the use of rain and greywater collection and re-use systems, and minimising impervious surface area is encouraged. Refer to Ngāi Tahu Subdivision and Development Guidelines (Appendix 1) for low impact design methods endorsed by mana whenua and guidance on stormwater, water supply and wastewater servicing. The guidelines provide a framework for Papatipu Rūnanga to positively and proactively influence and shape subdivision and development activities, while also enabling council and developers to identify issues of importance and desired outcomes for protecting tāngata whenua interests on the landscape. While subdivision and residential land development activities can have adverse effects on cultural values, they can also provide cultural benefits, including opportunities to re-affirm connections between tāngata whenua and place.

Soil is a fundamental resource, and together with air and water, is the basis on which life depends. Land use, subdivision and development activities must have appropriate controls to avoid over-saturation, contamination, and erosion of soils. Contaminated sites should be remediated, and all contaminated material should be removed from the site and disposed of at a licensed facility.

Activities such as residential land development can leave large areas of land cleared with bare soil exposed, increasing the risk of erosion and the discharge of sediment into waterways. Measures to minimise earthworks should be considered at the design phase of development. Earthworks in areas with shallow depth to groundwater and/or over an aquifer can have significant cultural impacts and are of concern.

5.0 Rūnanga – Affected Party or Not

This report is a preliminary assessment against the Mahaanui Iwi Management Plan to provide Council with guidance to the cultural impact of proposed rezoning of Stokes Land.

The Kaitiaki representatives of Te Ngāi Tūāhuriri Rūnanga have reviewed the proposed rezoning of Stokes Land and have provided the recommendations outlined in Section 6.0 to align these proposals more closely with the provisions in the Mahaanui IMP.

If the recommendations are provided for, the Rūnanga will not consider themselves to be an adversely affected party.

Mahaanui Kurataiao Ltd reserves the right to update the recommendations when Te Ngāi Tūāhuriri Rūnanga provide feedback for individual developments within the proposed area as consultation with Rūnanga at pre-application stage does not eliminate the requirement for the consenting authority to consult with mana whenua at the application stage.


6.0 Conditions

The following recommendations are provided to moderate effects of this proposed activity on mana whenua values:

1. Waterbodies waterways, springs, etc, including ephemeral waterways) must be retained and incorporated into the design of development associated with this land re-zoning request.
2. The future development must incorporate and protect natural characteristics of the landscape.
3. Mature native trees onsite must be retained and incorporated into future subdivision design.
4. Waterways should be protected and enhanced with suitable setbacks and riparian buffers planted with indigenous species (see policy WM12.5).

5. There should be a survey undertaken to identify springs and/or wetlands on the site. This should be undertaken by a suitably qualified expert. Springs and wetlands should be protected and enhanced with suitable setbacks and indigenous riparian planting.
6. Areas identified as culturally sensitive should be protected and enhanced. Consultation with the Papatipu Rūnanga may be required to determine culturally appropriate methods of enhancement.
7. Low impact design methods, such as, the use of rain and greywater collection and re-use systems, and minimising impervious surface area is encouraged. Refer to Ngāi Tahu Subdivision and Development Guidelines (Appendix 1) for low impact design methods endorsed by mana whenua.
8. Contaminated sites should be remediated. All contaminated material should be removed from the site and disposed of at a licensed facility.
9. Measures to minimise earthworks should be considered at the design phase of development.
10. Earthworks in areas with shallow depth to groundwater and/or over an aquifer can have significant cultural impacts and are of concern.
11. The site should be surveyed by a suitably qualified person(s) to determine whether there are taonga species within the site that need to be protected.
12. Refer to Ngāi Tahu Subdivision and Development Guidelines (Appendix 1) for guidance on stormwater, water supply and wastewater servicing.

Note: The list of recommendations is preliminary, general/non-specific and non-exhaustive and is provided as preliminary guidance only.



On behalf of Mahaanui Kurataiao Ltd, this report has been prepared by Angela Burton | Mahaanui Kurataiao Ltd Environmental Advisor.

Date: 17 May 2024

Appendix 1: Ngāi Tahu Subdivision and Development Guidelines

Note: *These guidelines are to be read in conjunction with Policies P4.1, P4.2 and P4.3 within the Mahaanui IMP.*

Cultural landscapes

- 1.1** A cultural landscape approach is the most appropriate means to identify, assess and manage the potential effects of subdivision and development on cultural values and significant sites [refer Section 5.8 Issue CL1].
- 1.2** Subdivision and development that may impact on sites of significance is subject Ngāi Tahu policy on Wāhi tapu me wāhi taonga and Silent Files (Section 5.8, Issues CL3 and CL4).
- 1.3** Subdivision and development can provide opportunities to recognise Ngāi Tahu culture, history and identity associated with specific places, and affirm connections between tāngata whenua and place, including but not limited to:
 - (i) Protecting and enhancing sites of cultural value, including waterways;
 - (ii) Using traditional Ngāi Tahu names for street and neighbourhood names, or name for developments;
 - (iii) Use of indigenous species as street trees, in open space and reserves;
 - (iv) Landscaping design that reflects cultural perspectives, ideas, and materials;
 - (v) Inclusion of interpretation materials, communicating the history and significance of places, resources, and names to tāngata whenua; and
 - (vi) Use of tāngata whenua inspired and designed artwork and structures.

Stormwater

- 2.1** All new developments must have on-site solutions to stormwater management (i.e. zero stormwater discharge off site), based on a multi-tiered approach to stormwater management that utilises the natural ability of Papatūānuku to filter and cleanse stormwater and avoids the discharge of contaminated stormwater to water [refer to Section 5.4, Policy P6.1].
- 2.2** Stormwater swales, wetlands and retention basins are appropriate land-based stormwater management options. These must be planted with native species (not left as grass) that are appropriate to the specific use, recognising the ability of particular species to absorb water and filter waste.
- 2.3** Stormwater management systems can be designed to provide for multiple uses. For example, stormwater management infrastructure as part of an open space network can provide amenity values, recreation, habitat for species that were once present on the site, and customary use.

- 2.4** Appropriate and effective measures must be identified and implemented to manage stormwater run-off during the construction phase, given the high sediment loads that stormwater may carry as a result of vegetation clearance and bare land.
- 2.5** Councils should require the upgrade and integration of existing stormwater discharges as part of stormwater management on land rezoned for development.
- 2.6** Developers should strive to enhance existing water quality standards in the catchment downstream of developments, through improved stormwater management.

Earthworks

- 3.1** Earthworks associated with subdivision and development are subject to the general policy on Earthworks (Section 5.4 Issue P11) and Wāhi tapu me wāhi taonga (Section 5.8, Issue CL3), including the specific methods used in high and low risk scenarios for accidental finds and damage to sites of significance.
- 3.2** The area of land cleared and left bare at any time during development should be kept to a minimum to reduce erosion, minimise stormwater run-off and protect waterways from sedimentation.
- 3.3** Earthworks should not modify or damage beds and margins of waterways, except where such activity is for the purpose of naturalisation or enhancement.
- 3.4** Excess soil from sites should be used as much as possible on site, as opposed to moving it off site. Excess soil can be used to create relief in reserves or buffer zones.

Water supply and use

- 4.1** New developments should incorporate measures to minimise pressure on existing water resources, community water supplies and infrastructure, including incentives or requirements for:
- (i) low water use appliances and low flush toilets;
 - (ii) grey water recycling; and
 - (iii) rainwater collection.
- 4.2** Where residential land development is proposed for an area with existing community water supply or infrastructure, the existing supply or infrastructure must be proven to be able to accommodate the increased population prior to the granting of subdivision consent.
- 4.3** Developments must recognise, and work to, existing limits on water supply. For example, where water supply is an issue, all new dwellings should be required to install rainwater collection systems.

Waste treatment and disposal

5.1 Developments should implement measures to reduce the volume of waste created within the development, including but not limited incentives or requirements for:

- (i) Low water use appliances and low flush toilets;
- (i) Grey water recycling; and
- (ii) Recycling and composting opportunities (e.g. supporting zero waste principles).

5.2 Where a development is proposed for an area with existing wastewater infrastructure, the infrastructure must be proven to be able to accommodate the increased population prior to the granting of the subdivision consent.

5.3 New rural residential or lifestyle block developments should connect to a reticulated sewage network if available.

5.4 Where new wastewater infrastructure is required for a development:

- (i) The preference is for community reticulated systems with local treatment and land-based discharge rather than individual septic tanks; and
- (ii) Where individual septic tanks are used, the preference is a wastewater treatment system rather than septic tanks.

Design guidelines

6.1 New developments should incorporate low impact urban design and sustainability options to reduce the development footprint on existing infrastructure and the environment, including sustainable housing design and low impact and self-sufficient solutions for water, waste, energy such as:

- (i) Position of houses to maximise passive solar gain;
- (ii) Rainwater collection and greywater recycling;
- (iii) Low energy and water use appliances;
- (iv) Insulation and double glazing; and
- (v) Use of solar energy generation for hot water.

6.2 Developers should provide incentives for homeowners to adopt sustainability and self-sufficient solutions as per 6.1 above.

6.3 Urban and landscape design should encourage and support a sense of community within developments, including the position of houses, appropriately designed fencing, sufficient open spaces, and provisions for community gardens.

6.4 Show homes within residential land developments can be used to showcase solar hot water, greywater recycling and other sustainability options, and raise the profile of low impact urban design options.

Landscaping and open space

7.1 Sufficient open space is essential to community and cultural wellbeing, and the realization of indigenous biodiversity objectives, and effective stormwater management.

7.2 Indigenous biodiversity objectives should be incorporated into development plans, consistent with the restoration and enhancement of indigenous biodiversity on the landscape.

7.3 Indigenous biodiversity objectives to include provisions to use indigenous species for:

(i) street trees;

(ii) open space and reserves;

(iii) native ground cover species for swales;

(iv) stormwater management network; and

(v) home gardens.

7.4 Indigenous species used in planting and landscaping should be appropriate to the local environment, and where possible from locally sourced seed supplies.

7.5 Options and opportunities to incorporate cultural and/or mahinga kai themed gardens in open and reserve space can be considered in development planning (e.g. pā harakeke as a source of weaving materials; reserves planted with tree species such as mātai, kahikatea and tōtara could be established with the long-term view of having mature trees available for customary use).

7.6 Developers should offer incentives for homeowners to use native species in gardens, including the provision of lists of recommended plants to avoid, discounts at local nursery, and landscaping ideas using native species.

Appendix I