

**BEFORE INDEPENDENT HEARING COMMISSIONERS APPOINTED BY THE
WAIMAKARIRI DISTRICT COUNCIL**

IN THE MATTER OF

The Resource Management Act 1991 (**RMA** or
the Act)

AND

IN THE MATTER OF

Hearing of Submissions and Further
Submissions on the Proposed Waimakariri
District Plan (**PWDP** or **the Proposed Plan**)

AND

IN THE MATTER OF

Submissions and Further Submissions on the
Proposed Waimakariri District Plan by
Howard Stone

**MEMORANDUM OF COUNSEL FOR HOWARD STONE
SUBMITTER 191.1 - HEARING STREAM 12A**

DATED: 13 June 2024

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MAY IT PLEASE THE COMMISSIONERS:

- 1 At the Stream 12A hearing on Tuesday 4 June, the Panel asked Counsel for the Applicant about Proposed Change 1 (**PC1**) to Chapter Six of the Canterbury Regional Policy Statement ("**CRPS**") and whether amendments to Map A under PC1, had affected Pegasus/Woodend.
- 2 Counsel indicated at the hearing that there was no significant amendment made to Map A with regard to the Pegasus/Woodend area under PC1. I refer to **Appendix A** of this Memorandum, which shows Map A prior to the addition of new urban housing development areas in Rolleston, Rangiora and Kaiapoi (**Figure 1**), and Map A following PC1 (**Figure 2**).
- 3 Both versions of Map A show the area around Woodend/Pegasus to be the same, with no addition of land marked 'Future Development Area' (**FDA**), as shown in orange on Map A.
- 4 Concerns were raised in the submission stage of PC1 that Map A, as proposed under PC1, would not allow the Canterbury region's housing needs to be met in the long term, as required by the NPS-UD 2020.¹
- 5 *Our Space 2018-2048: Greater Christchurch Settlement Pattern Update* (**Our Space**) outlines land use and development proposals to ensure sufficient development capacity for housing and business growth across Greater Christchurch to 2048. This was done through amendments to Map A, which were later included in the CRPS via PC1.
- 6 Our Space identified FDAs in the context of the NPS-UDC 2016. The NPS-UD 2020 has since come into effect and provides much stronger and clearer objectives around urban growth and development. It was submitted that, as proposed, PC1 did not give effect to the NPS-UD 2020, in that it did not identify sufficient development capacity.²
- 7 It is noted that Our Space clearly states the proposed locations of Future Development Areas are intended to provide "some direction" to inform future RMA processes and are "indicative only."³ There is nothing preventing the

¹ Submission of Carter Group Limited on Publicly Notified Plan Change 1, at [13].

² Submission of Carter Group Limited on Publicly Notified Plan Change 1, at [14].

³ Our Space 2018-2048: Greater Christchurch Settlement Pattern Update, Page 30, Figure 16.

inclusion of further FDAs to Map A, and in fact Our Space contemplated that future planning processes would do so.⁴

8 Ms Sunde, planning witness for Howard Stone, notes that PC1 was both a change to Map A and to the text, and these need to be read in conjunction. Map A provided one part of the response to the requirements of the NPS-UD, while the changes to the policy text itself also enabled more flexibility, specifically:

(a) Objective 6.2.2 Urban Form and Settlement: 6.2.2.5.

“Encouraging sustainable and self-sufficient growth of the towns of Rangiora, Kaiapoi, Woodend, Lincoln, Rolleston and Prebbleton and consolidation of the existing settlement of West Melton;” (our emphasis added).

(b) 6.3 Policies - 6.3.1 Development in the Greater Christchurch Area –
Methods: Principal reasons and explanation

“Map A shows existing urban areas and priority areas for development for Greater Christchurch. These areas are identified as being required to provide sufficient land zoned for urban purposes to enable recovery and rebuilding through to 2028. The Policy and Map A provide a clear, co-ordinated land use and infrastructure framework for the recovery of Greater Christchurch

...

New residential development is provided for within Future Development Areas, where the circumstances set out in Policy 6.3.12 are met. It is anticipated that established urban activities located outside of the identified urban area will be able to continue to operate their activities, with any expansion considered on a case-by-case basis.” (our emphasis added).

9 It is Ms Sunde’s view that the policy framework enables flexibility to be considered, with expansion still able to be considered on a case-by-case basis.

⁴ Submission of Carter Group Limited on Publicly Notified Plan Change 1, at [15].

Further, it is stated in the CRPS that Map A is intended for a timeframe through to 2028. The PDWP will go beyond that timeframe.

Dated: 13 June 2024

A handwritten signature in cursive script, appearing to read "M Perpick".

Margo Perpick
Counsel for Howard Stone

APPENDIX A

Map A – Greenfield Priority Areas (viewable in more detail at www.ecan.govt.nz)

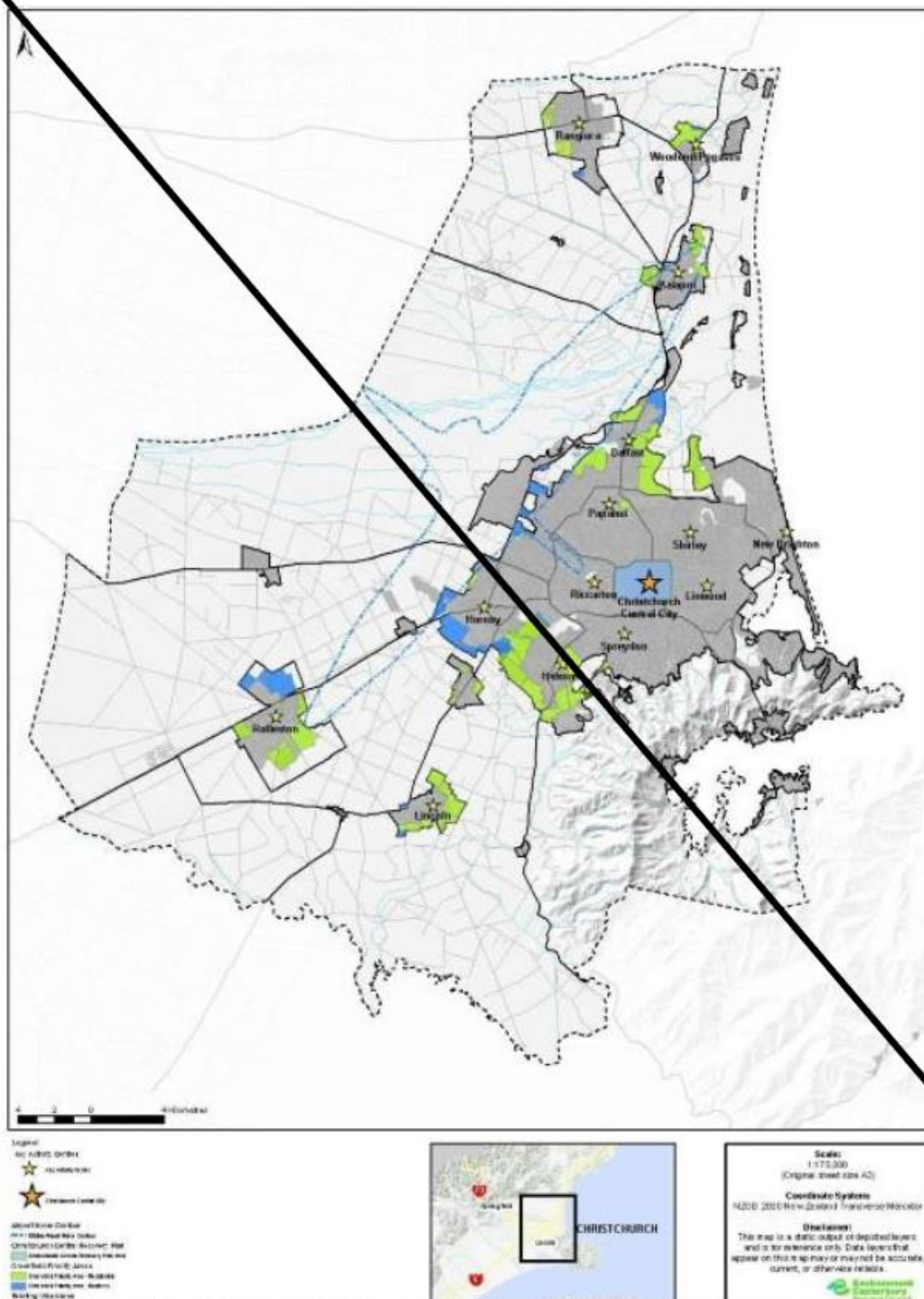


Figure 1: Map A prior to the addition of new urban housing development area in Rolleston, Rangiora and Kaiapoi⁵

⁵ Proposed Change 1 to Chapter 6 of the Canterbury Regional Policy Statement – January 2021

Map A - Greenfield Priority Areas and Future Development Areas (viewable in more detail at www.ecan.govt.nz)

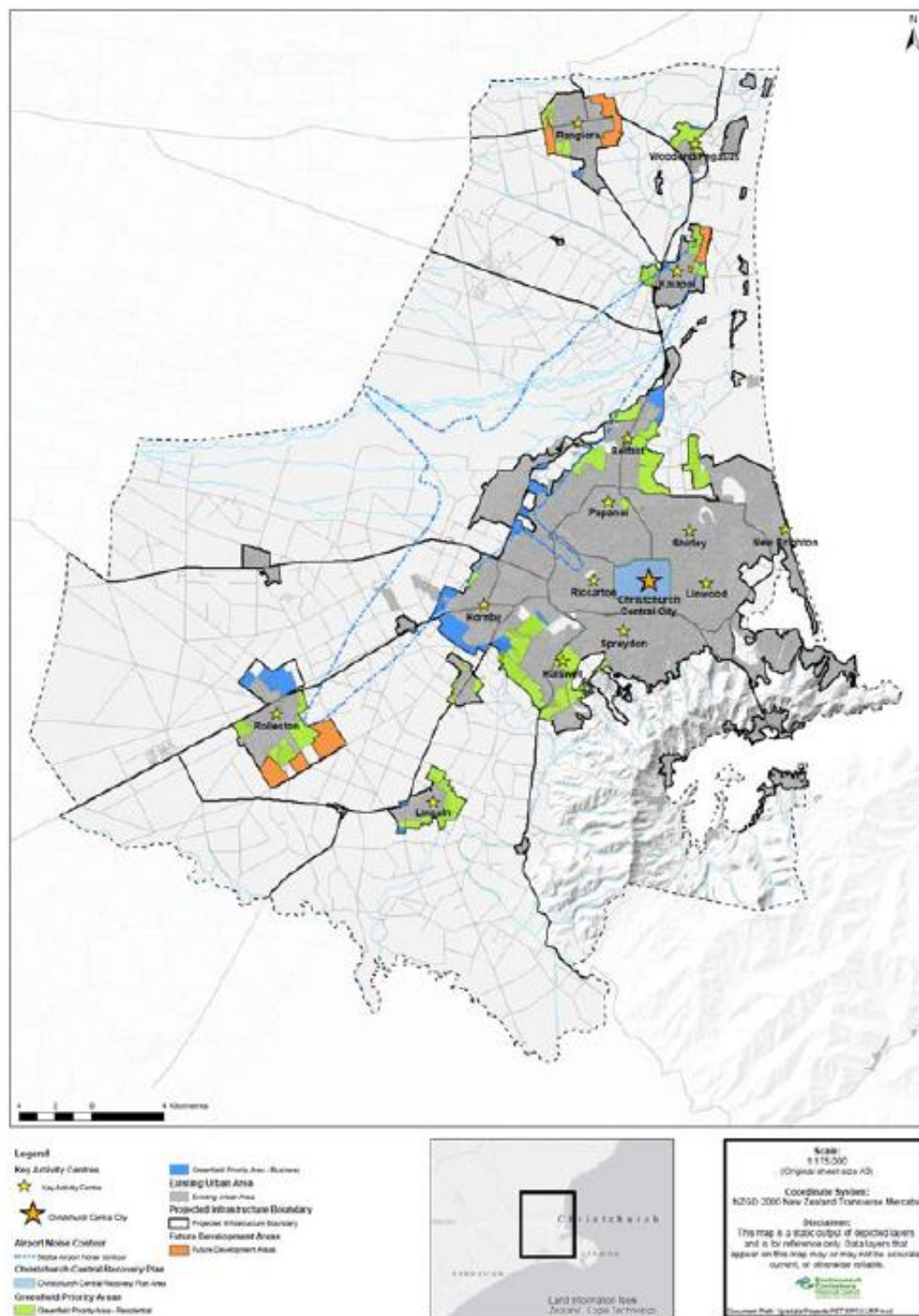


Figure 2: Map A following Plan Change 1⁶

⁶ Chapter 6 Canterbury Regional Policy Statement