

Before an Independent Hearings Panel appointed by the Waimakariri District Council under: the Resource Management Act 1991 in the matter of: Hearing Stream Seven

Lay Statement of Ken Fletcher

Introduction:

1. I live in Oxford and have done so since 1999. I am an economist and an Independent Resource Management Commissioner. I am a submitter on both the PDP (#99) and Variation 1 (#74).
2. As an economist I have made a Statement of Expert Evidence relevant to Stream 7A, 7B and Stream 8.
3. This Statement is not expert evidence but my submission as a layperson to Hearing Stream 7.

Background

4. I live in Oxford and in 2022 my wife and I bought a 1.15ha block of land in Oxford, zoned Res 4A in the ODP and LLR in the PDP. We have since applied for and been granted a non-complying resource consent to subdivide it into 4 lots of 2800m², and we are in the process of implementing this consent. We are not seeking to have our site rezoned, to the best of my knowledge there are no submissions affecting our site, and there is no scope for it to be rezoned through these proceedings. We have included covenants on our subdivision, including restricting activities to only those permitted by the District Plan. Thus no further subdivision is permitted unless and until a plan change enables it.
5. We did not particularly want a section as large as 2800m², preferring something in the region of 1200m². It was our inability to find a section in the 1000-2000m² range that highlighted to me the hole in the zoning structure that my submissions address.

Summary of Submissions Made

6. My submissions on the PDP and Variation 1 have two underlying themes
 - I. Oxford is different from Rangiora/Kaiapoi/Woodend (note that Woodend includes Pegasus/Ravenswood throughout this statement) and this needs to be recognised in the Plan and appropriate changes made to reflect the differences;

II. There is a hole in the district residential zoning schema in both the Operative and Proposed plans that needs to be addressed

7. Variation 1 brings both of these themes into greater prominence.
8. In my statements to earlier hearings I outlined some of the differences between Oxford and Rangiora/Kaiapoi/Woodend. An extract from that statement is attached as Appendix 1. Variation 1, with the extension of the MDRS to all of the General Residential Zone (GRZ) across Rangiora/Kaiapoi/Woodend, adds significantly to those differences. Oxford is the only urban environment of size, the only Key Activity Centre, within the District that is not covered by the MDRS requirements.
9. Variation 1 effectively removes the General Residential Zone from Rangiora/Kaiapoi/Woodend, leaving the only area where the GRZ applies is in Oxford. Effectively, under Variation 1 the GRZ could be renamed the Oxford Residential Zone. Thus Variation 1 has a dramatic impact on the District's residential zoning structure. It enlarges the existing hole in the PDP residential zoning schema into a gaping chasm.

Relief Sought in Submissions

10. The relief sought in my PDP submission included

Recognition in the Plan that Oxford has a different character to Rangiora/Kaiapoi/Woodend and that in Oxford the Large Lot Residential zone was "within and around" Oxford and

- 1. increase the minimum lot size in the existing Oxford residential area to 600m² as per the operative plan.*
- 2. Enable the outward growth of Oxford with lot sizes ranging from 800m² up to around 2000-2500m²*
- 3. The current LLR zones on the northern and eastern edges of the town should be enabled for lot sizes in the range (say) 2000m² to 5000m², with the expansion area to the north (currently zoned rural with a LLR overlay) enabled for lots between (say) 2000m² and 5000m²*
- 4. Remove the Average 5000m² requirement for LLR areas on the town periphery, and replace it with a maximum lot size of 5000m², with a minimum lot size of (say) 2000m².*

11. The relief sought in my Variation 1 submissions was

Introduce provisions that will in fact produce a range of lot sizes being made available through subdivision. There are several ways this could be achieved, including

- redefining the Large Lot Residential Zone to be anything greater than 1000m and allowing subdivision to this size as a restricted discretionary (or no more than discretionary) activity. This would then apply to all land zoned Res4a or 4b in the current plan;*
- creating a new zone (LLRZ1) that allows subdivision down to 1000m² (or 2000m²) as a controlled or restricted discretionary activity, and apply this to land currently zoned Res 4A or 4B; and renaming the proposed LLRZ to be LLRZ2 and applying this zoning to land rezoned from rural, with subdivision down to 2500m² available as a discretionary activity;*

- *enabling subdivision of LLRZ land to (say) 2500m² as a restricted discretionary activity, and below that size being discretionary.*

12. The above have been taken by the s42A reporting officers to be explicit requests to make standalone changes to the zoning provisions. This is not the case. The text of my submissions makes it clear that they are mechanisms to achieve the wider purpose of plugging the hole in the range of section sizes that the operative and proposed zoning provisions create. This can be seen from this excerpt from my submission on the PDP:

5000m² is a very large lot in terms of an urban area. It may have been appropriate in the desire to limit the explosion of smaller lots in the rural zones as experienced in the past. As a way of enabling and managing the expansion of an existing township, it imposes inappropriate constraints. In retaining the existing Large Lot Residential (LLR) around the town, with the 5000m² average requirement, it restricts the future supply of new lots as the town expands to either small lots (500-600m²) if zoned GRE or very large lots if zoned LLR. There is no realistic provision for anything in between. The market will seek to maximise the output in any subdivision, forcing the lot sizes toward the minimum allowed within the zone, and requiring expensive resource consent processes to enable any development less than the minimum within the LLR zone.

Effectively, within new subdivisions, there will be no options between small lots (5-800m²) and very large lots (5000m² average) They will be no option for a 1000-2000-3000-4000m² section without an expensive resource consent application for a noncomplying activity. This does not provide for a range of housing types, it does not provide choice in lot size, given most purchasers will only have the option that the subdivider provides.

13. This is made clear in both the text of my submission and the relief sought to Variation 1. In the body of my Variation 1 submission I stated

Variation 1 ... has the effect of limiting even more the range of lot sizes being made available, and thereby greatly limiting the range and variety of residential types sizes and densities, contrary to the strategic directions, objectives and policies.

The interaction of the market and the rules needs to be taken into account. The current and proposed rules interact with economics in such a way to drive the range of residential lot sizes brought to the market towards two points- the minimum size enabled in the general residential and MDRS zones, and the required average lot size in the large lot residential zone. Thus residential lot sizes in the MDRS and GRZ zones congregate in the region just above the minimum lot size (600m² in the operative plan and 500m² in the proposed plan) - typically 600-700m² depending on size of lot being subdivided, and around the required 5000m² average in the LLRZ zone. There is almost nothing subdivided to produce lots in the 800-2500m² range, or between 2500 & 4000m².

14. The relief sought in my Variation 1 submission was explicit:

Introduce provisions that will in fact produce a range of lot sizes being made available through subdivision. There are several ways this could be achieved, including ...

15. Through both my submissions I sought to address the hole in the zoning schema that is evident in the ODP and the PDP and is exacerbated by Variation 1.

16. The cleanest and most obvious solution is to

- I. Create an intermediate zone, Medium Large Residential Zone (MLRZ referred to as LLRZ1 in my submission)) that sits between the Oxford/General Residential Zone (O/GRZ) and the Large Lot Residential Zone (LLRZ). The Medium Large Residential Zone could simply replicate most of the provisions of the LLRZ, other than requiring an average size of (say) 2250m² with a range of (say) 1000-3500m².
- II. Apply the General Residential Zone (GRZ) more widely than just Oxford. I understand that there are rezoning applications before the Panel seeking a GRZ zoning. The hole in the zoning regime created by Variation 1, and the impact of the proposed rezonings in addressing that hole in by supplying sections in the 500-1000m² range, should be a consideration when making those decisions.

17. I acknowledge there are other planning methods available that might also address the gap in the zone structure – e.g. changing the status of being outside the permitted range and average of the LLRZ – and my relief did cover some of these.

18. In my submissions, the relief sought and in my Statement of Expert Evidence I have focused my discussions around Oxford as that is the part of the District I have most knowledge of. However, despite the distinct differences between Oxford and Rangiora/Kaiapoi/Woodend, the issue of the gap in the supply of sections resulting from the interaction of the zoning structure and the market has implications across the District as a whole. The solution needs to be generically available to relevant locations wherever in the District they occur.

S42A Reports

1. Stream 7A S42A Report PDP Residential Zones – Mr MacLennan

19. Mr MacClennan in his report on the Residential Zones rejects the view that LLRZ zones are within and on the edges of established townships. He relies on the phrasing of the Part 1 Description of the District that large lot development is “on the outskirts of Oxford”, and considers that the LLRZ Introduction phrase of LLR zones being located “near but outside the established townships” is correct.¹
20. I addressed the issue of the inaccuracy of the Description of the District in Part 1 of the PDP in my submission to Hearing 1.
21. While I agree that the LLRZ zones in the eastern part of the District are located near but outside the established townships of Rangiora/Kaiapoi/Woodend, that is clearly not the case in Oxford, where the LLRZ zones are an integral part within the town boundaries. The difference between the LLRZ zones in the east and the west of the District probably arises as those in the east were developed within the planning regime, whereas in Oxford the designations were put in place to capture what pre-dated the planning regime and was pre-existing on the ground.
22. To state that the LLRZ zones are ‘near but outside’ Oxford is a false statement. The main blocks to the north² and south³ are clearly within the township, and the extension along Woodside Rd is a continuation of the township to the west. This is clearly evident in all WDC publications, as can be seen from the Snapshot of the District from the District Development Strategy⁴ shown below. The urban areas are shown in grey with all the LLRZ areas noted above included as part of Oxford, while

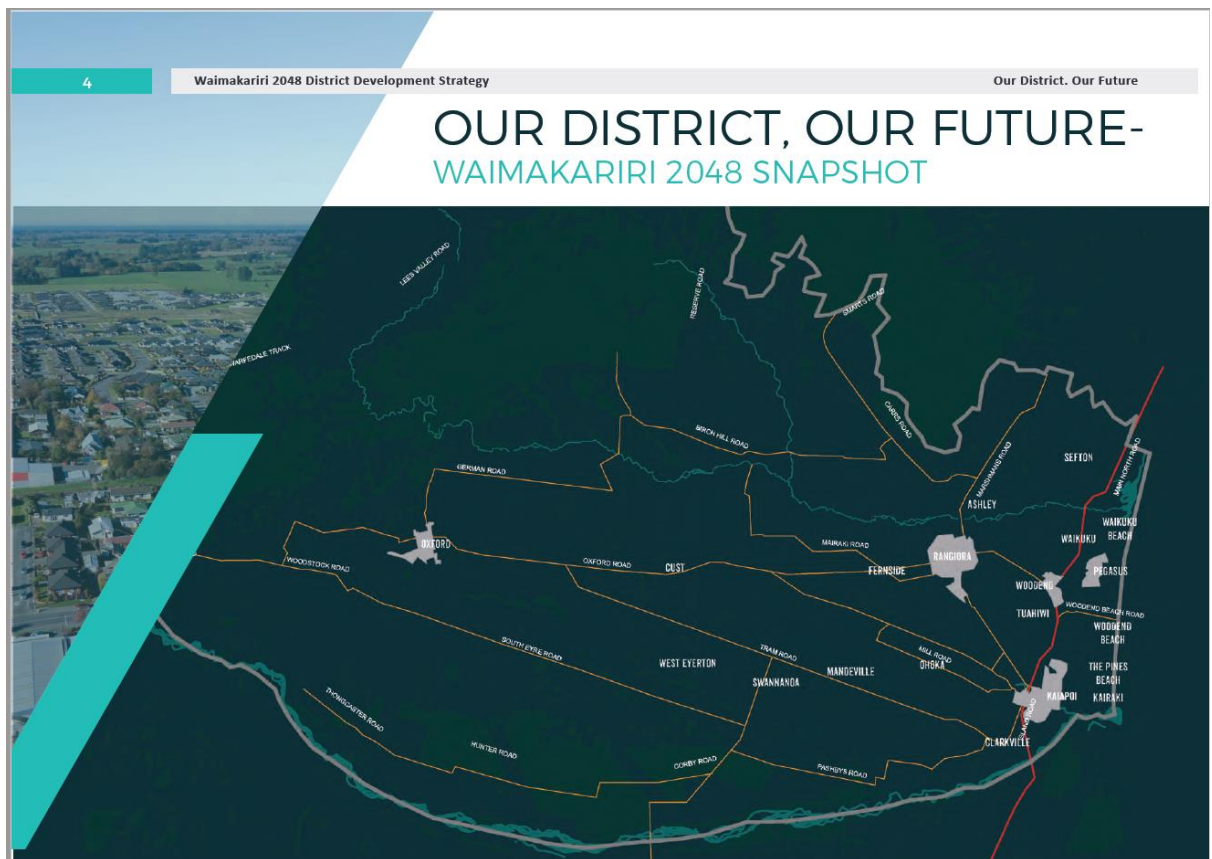
¹ Stream 7A Residential and Large Lot Residential s42A Report, (MacLennan) at 252-256

² High St, rear of Church St, Queen St and Bay Rd

³ Bounded by Commercial Rd, Burnt Hill Rd and Harewood Rd up to the back of properties on Main St

⁴ Our District, Our Future, Waimakariri 2048 District Development Strategy, July 2018, p4

none of the LLRZ areas in the east of the District are shown.



23. This is repeated throughout the document, including the Oxford Snapshot shown below⁵, where all the LLRZ areas, including the more recent extensions to the east along Oxford Rd are shown as part of the Current Residential Area.

⁵ Ibid p45

WHERE ARE WE GOING (2048)?

- Remains the fourth largest town within the Waimakariri District
- 3,693 – estimated population (2048)
- 1,477 – estimated households
- 595 – new households in Oxford
- 20 – estimated annual building consents for new houses (from 2017-2048)
- At least 30-40 hectares of additional feasible residential greenfield land demand by 2048 (this includes remaining stages of existing residential developments and potentially new greenfield areas)
- Demand for new households to be met in part by developing existing vacant land and / or intensifying the density in existing zoned areas, particularly rural residential areas
- Future residential long-term growth directions proposed to the south of Oxford
- Potential for additional residential development to the east (North of Oxford Road), subject to further consultation with landowners
- Commercial (retail and office) and industrial land supply sufficient to meet 2048 requirements
- Further consultation is required with the landowners regarding the possibility of additional business zoning to the south in the long-term, if demand is identified through the NPS-UDC
- 3% of retail activity in the District occurs in Oxford
- Oxford Town Centre Strategy implementation to be monitored
- New growth areas to connect into existing sewer and water networks
- Stormwater Levels of Service designed to meet increased performance requirements
- The needs for community facilities in Oxford are met
- Existing strategic infrastructure is considered



24. In Oxford, unlike the rest of the District, the LLRZ areas are clearly ‘within’ the township, not ‘near to’ or ‘on the edge of’ the township.

25. Mr MacLennan draws on UFD-P3(c) in support of his view⁶. This states that LLRZ should not be on the direct edges of Rangiora/Kaiapoi/Woodend. With respect to Mr MacLennan, that is not relevant to the LLRZ in Oxford. The PDP covers the entire District, not just Rangiora/Kaiapoi/Woodend. It needs to reflect Oxford as much as Rangiora/Kaiapoi/Woodend.

26. Mr MacLennan makes no reference to the wider point of my submission, that there is a hole in the zoning structure. He does not address this issue.

2. Stream 7B S42A Report – Variation 1 Housing Intensification – Mr Wilson

27. Mr Wilson in his report does not discuss my submission at all, but proceeds to reject it⁷, stating only that the MDRS does not impose a minimum lot size and that Large Lot Residential developments are out of scope of the IPI⁸.

⁶ MacLennan at 255

⁷ Stream 7B S42A Report Variation 1 Housing Intensification (Wilson 1) at 119

⁸ Wilson 1 p242

3. Stream 7A S42A Report PDP Medium Density Provisions – Mr Wilson

28. This report is focused on the PDP medium density provisions and makes and makes no mention of my submissions, and neither should it.

29. From the above it can be seen that the wider point of my submission – the hole in the zoning structure – has slipped through the cracks between the s42A reports.

Scope – Variation 1

30. Mr Wilson claimed that Large Lot Residential Developments were outside the scope of the IPI, and he may be correct. But my submission is not about any LLRZ developments, but about the zoning structure that includes the LLRZ zone. This is clearly within scope through RMA s32(3)(b), and also by being “on” the Variation in terms of Clearwater and Motor Machinists.

RMA s32

31. S32 requires that an assessment be made of both the PDP and Variation 1. This must identify and assess the benefits and costs of the effects that are anticipated from the proposal (s32(2) (a)).

32. Where a proposal (Variation 1) amends an existing plan or proposed plan (the PDP), then the assessment must relate to the objectives of the existing proposal (the PDP) to the extent that they would remain under the amending proposal (Variation 1) (s32(3)(b)(ii)) .

RMA s32(3)

If the proposal (an **amending proposal**) will amend a standard, statement, national planning standard, regulation, plan, or change that is already proposed or that already exists (an **existing proposal**), the examination under subsection (1)(b) must relate to—

- (a) the provisions and objectives of the amending proposal; and
- (b) the objectives of the existing proposal to the extent that those objectives—**
 - (i) are relevant to the objectives of the amending proposal; and
 - (ii) would remain if the amending proposal were to take effect.**

33. The s32 analysis for Variation 1 was required to consider the effects of what would be left of the PDP if the Variation was enacted. This includes (relevantly) the zoning structure across the district. There does not appear to be any consideration within the s32 report for Variation 1 of the effects of the Variation on the structure of the district zoning provisions or indeed any assessment of the effects of the Variation on the remaining objectives of the PDP as required by s32(3)(b)(ii).

34. Variation 1 is an amending proposal under s32(3) and an assessment of the effects of the proposal is required to consider the effects on the objectives of the PDP as the existing proposal. This has not been undertaken. Relevantly, there has been no assessment of the impact of Variation 1 on PDP Objective RESZ-O5 and Policy RESZ-P8 Housing Choice. As shown in my expert evidence, the effect of Variation 1 will be to exacerbate even further the PDP discontinuity in the supply of sections and puts the achievement of the Objective out of reach⁹. RESZ-O1 (2), requiring residential growth that is responsive to community needs, would also be adversely affected by Variation 1.

Motor Machinists and Clearwater

35. The Motor Machinists decision stated, as quoted in the Buddle Findlay Opinion¹⁰ that to be 'on' the Variation a submission
... must address the proposed plan change itself. That is, to the alteration of the status quo brought about by that change. ... It involves itself 2 aspects: the breadth of alteration to the status quo entailed in the proposed plan change, and whether the submission then addresses that alteration.

Variation 1 is a major alteration to the residential zoning structure within the District, so is a major change to status quo, which my submission addresses.

36. The Opinion quotes the decision to state that one way of analysing whether a submission was 'on' Variation 1 is

to ask whether the management regime in a district plan for a particular resource (such as a particular lot) is altered by the plan change.

Clearly the residential zone structure is used to manage a particular resource and it is substantially altered by Variation 1.

The Buddle Findlay Opinion further quotes the Motor Machinists decision (underlining in the Opinion)

Yet the Clearwater approach does not exclude altogether zoning extension by submission. Incidental or consequential extensions of zoning changes proposed in a plan change are permissible, provided that no further s 32 analysis is required to inform affected persons of the comparative merits of that change.

⁹ Expert Evidence at 41

¹⁰ As quoted in the Buddle Findlay opinion of 30 May 2023 (the Opinion) at 10

The Opinion concludes¹¹ that

The High Court in Motor Machinists confirmed that the Clearwater test for determining whether a submission is on a variation or plan change does not prevent submissions from seeking zoning extensions altogether.

This applies to the Zone structure as much as it does to the zoning of specific lots. The LLRZ and GRZ are zones within the residential zoning structure of the District and 'adjacent'. The GRZ is drastically curtailed in its coverage by Variation 1, aggravating the discontinuity in the range of sections supplied under the PDP.

The first limb of the Clearwater test is satisfied. The Variation is a major alteration to the zoning structure that manages residential land. This alone puts the different residential zones 'on' the Variation. The LLRZ zone is adjacent to the GRZ zone that Variation 1 drastically reduces in scope. Thus also puts the LLRZ zone 'on' the Variation.

37. The Opinion addresses the second limb of the Clearwater test¹², noting that a s32 analysis is required to notify any persons affected and that incidental or consequential extensions of zoning changes are permissible if no s32 analysis is required to inform affected persons¹³. Inserting the Medium Large Residential Zone (MLRZ) into the zone structure does not affect anyone. All it does is create the option of seeking a future plan change to rezone land to MLRZ. There is no risk that anyone affected has been denied an appropriate response. The second limb of the Clearwater test is satisfied.

38. The Opinion relevantly concludes¹⁴ that Cl 99(2)(b) gives the Panel the ability to make recommendations on matters raised in the hearing but not explicitly covered in submissions, provided the matter is 'on' the Variation. Acquisition

Summary and Conclusions

39. Just as Oxford is different from Rangiora/Kaiapoi/Woodend and those differences need to be acknowledged and accommodated in the District Plan, the Large Lot Residential zones (LLRZ) in Oxford are different from those elsewhere in the district. The Oxford LLRZ zones are within the township and part of the township, not outside the town as the LLRZ zones in the rest of the district are. This difference needs to be

¹¹ Opinion at 13

¹² Opinion at 8b

¹³ Opinion at 13

¹⁴ Opinion at 23

acknowledged and reflected in the words and descriptions in the Plan. LLRZ zones elsewhere in the District are areas of “very low density rural residential living”¹⁵, those in Oxford are clearly not “very low density”, and are an integral part of the township.

40. The hole in the zoning structure evident in the PDP, and exacerbated by Variation 1, needs to be addressed if the Residential Objectives and Policies on housing choice and meeting community needs (RESZ-O1(2), RESZ-O5 and RESZ-P8) are to be achievable. This requires enabling in an effective way the development of new residential sections in the 600-1000m² and 1000-3500m² ranges. This requires creating GRZ areas outside Oxford, and the creation of a new Medium Large Residential Zone to sit between the GRZ and the LLRZ zones.



Ken Fletcher

5 September 2024

¹⁵ PDP Introduction to the Residential Zones.

Appendix 1

Extract from Statement to Hearing 1 & 2

Description of the District

The district description states

Some 80% of the population is located in the eastern part of the [District](#) which contains the largest towns of Kaiapoi, Rangiora and Woodend/Pegasus. Oxford is the largest town in the west of the [District](#).

This, while correct, does not capture the gulf that separates Oxford from the other named centres, and this is generally the case throughout the Plan. The Plan variously identifies Oxford, along with Rangiora and Kaiapoi as a Key Activity Centreⁱ, as having a Principal Shopping Streetⁱⁱ, and as one of the four main centres (including Woodend)ⁱⁱⁱ. Oxford is stated to be one of “...the larger [urban environments](#)...” along with Rangiora, Kaiapoi and Woodend/Pegasus^{iv}.

Reading the plan gives the impression that Oxford is one and the same as Rangiora, Kaiapoi and Woodend/Pegasus, just “in the west”. The reality is very different.

- Rangiora, Kaiapoi and Woodend/Pegasus are all within 10km of each other. Oxford is 30-40km from all of them.
- Rangiora/Kaiapoi and Woodend/Pegasus all have 10,000-plus population, Oxford has about 2,200^v.
- Rangiora, Kaiapoi and Wooded/Pegasus all have public transport linking them to each other and to Christchurch. Oxford has no public transport.
- Rangiora, Kaiapoi and Woodend/Pegasus have two all-year round public swimming pools, and an indoor sports stadium, funded by rates. Oxford has neither.
- Between them, Rangiora, Kaiapoi and Woodend/Pegasus have numerous primary schools and two secondary schools. Oxford has an Area School.
- Oxford is still dominated by the classic Kiwi half- and quarter-acre lots, despite post-earthquake development of sub-1000m² developments and infill subdivisions. It retains the character of the classic NZ country town.
- Oxford has a considerably higher self-sufficiency ratio than the wider district, with over 40% of resident labour force working in Oxford ward, and over 55% working within the district^{vi}.
- Although Oxford is experiencing the same population growth pressures as the rest of the district (15% growth 2013-2018 and 28% growth 2006-2018^{vii}), Oxford is the only Waimakariri main centre that has not had areas of residential or commercial land expansion identified in the proposed plan.
- Although the plan includes Oxford as an urban environment (along with every hamlet village and town in the district!), despite being nowhere near the 10,000-population threshold^{viii}, Oxford is not prima facie an urban environment under the NPS-UD, unlike Rangiora, Kaiapoi and Woodend/Pegasus. It is unclear, but the plan appears to consider the entire district not zoned rural to be part of one single housing and labour market. This is the only way the Plan description of the urban environment can be reconciled with the NPS-UD definition.

- Oxford is not subject to the Medium Density Residential Zone provisions.
- Oxford is not included within Greater Christchurch area and is not covered in the Greater Christchurch Spatial Plan^{ix}.
- Oxford is not covered by Map A of the RPS.
- WDC 2021 housing demand assessment has excluded Oxford because it is not within the Greater Christchurch Partnership area^x. The NPS-UD does not require a housing demand assessment for Greater Christchurch, but to urban environments within Tier 1 districts. Waimakariri is the tier 1 district, not Greater Christchurch. Although Oxford is nominally excluded under the NPS-UD definition, the proposed plan interpretation of Urban Environment brings Oxford back into the scope of NPS-UD.
- WDC is now updating its future development strategy (Our District, our Future, July 2018) in conjunction with the Greater Christchurch partners as a joint future development strategy^{xi}. As Oxford is outside the scope of Greater Christchurch, Oxford is excluded from the District Future Development Strategy.

The planning fixation on Greater Christchurch and Map A of the RPS leads to unintended consequences for areas like Oxford that are outside Greater Christchurch, as demonstrated by the previous submission from Ashley Industrial Services¹⁶. The plan writers and the s42A report assumes that, being outside Greater Christchurch, Oxford will not have any areas of new development and/or that reverse sensitivity effects could not apply in Oxford. The plan is about the Waimakariri District and applies to the whole district. It is not about the Greater Christchurch area.

Oxford is a Key Activity Centre, it is one of the District's four main centres, it does have a Principal Shopping Street and is one of the larger urban environments, along with Rangiora, Kaiapoi and Woodend/Pegasus/Ravenswood, as stated in the proposed plan. But Oxford is very clearly not like Rangiora, Kaiapoi, and Woodend/Ravenswood/Pegasus. Oxford retains much of the character and flavour of a country town, while the other centres are better characterised as commuter towns and satellites of Christchurch.

Oxford is the largest town in the west of the district, but it has not yet joined Bilbo, Frodo and the elves and gone into the west. Oxford has a different character and flavour from the other district main centres, and this needs to be recognised in the proposed plan. The only place where this can be done is in the District Description

The s42A report claims that the Description of the District is about the physical features of the district in objective terms, and that character is subjective^{xii}. While the detail of character may be subjective, that there are significant differences in character between centres is objective fact. Where those centres are otherwise lumped together in the detail of the plan, that there is a significant difference needs to be acknowledged and stated upfront in the plan. The only place to do that is in the Description of the District.

Urban Centres v Urban Environment

At 3.9.1 the Urban Form s42A report recommends the introduction of a new definition, Urban Centres, that includes Rangiora, Kaiapoi and Woodend/Pegasus but not Oxford,

¹⁶ AIS submission on reverse sensitivity

and then proposed using Urban Centres in place of Urban Environment in SD-O2, UFD-P1 and UFD-P2. The effect of that is to remove any objective or policy provisions allowing new residential development in Oxford.

The s42A report states (para 167) (emphasis added)

The intent of the Urban Form and Development objectives and policies are to encourage any future residential, industrial and commercial development to occur on land that adjoins **Rangiora, Kaiapoi and Woodend** in line with objectives 6.2.2(4) and 6.2.2(5), and Policy 6.3.1(4) of the RPS.

That is not what the notified urban form objectives and policies are doing. As notified, they are about residential capacity development in **the district**¹⁷, with a particular carve out for that occurring in Rangiora and Kaiapoi¹⁸. Submissions seek to extend the carve out to Woodend/Pegasus. Any move to restrict new residential development to just the carve out areas is an error and out of scope.

The planning fixation of Greater Christchurch and Map A again results in Oxford falling out of the Plan. The latest WDC Future Development Strategy has Oxford population growing by 67% 2018-2048¹⁹. The s42A report would preclude any new residential development in Oxford to accommodate that growth.

Oxford is different from Rangiora, Kaiapoi and Woodend/Pegasus and this needs to be clearly acknowledged in the Plan at a high level. The only place to do this is in the description of the district. If this is not done the planning fixation of Greater Christchurch will result in Oxford being forgotten in this plan development process and will result in Oxford truly going into the West.

I stand by my submission that the Description of the District should be amended to read

Oxford, ~~is~~ the largest town in the west of the [District has a different character to Rangiora, Kaiapoi and Woodend/Pegasus](#).

ⁱ Definitions: KEY ACTIVITY CENTRE - means the centres of Rangiora, Kaiapoi and Oxford *which are focal points for employment, community activities and the transport network; and* which are suitable for more intensive mixed-use development.

ⁱⁱ Definitions: PRINCIPAL SHOPPING STREET - means an area identified in the [District Plan](#) as a principal shopping street in Rangiora, Oxford or Kaiapoi.

ⁱⁱⁱ SD-O3 Urban Development (5) supports a hierarchy of urban centres, with the District's main centres in Rangiora, Kaiapoi, Oxford and Woodend being: ...

^{iv} General Objectives for all Residential Zones, Introduction

^v 2018 Census

¹⁷ SD-O3, UFD-O1, UFD-P1, UFD-P2(2), UFD-P3 to UFD-P5 and UFD-P7 to UFD-P10

¹⁸ UFD-P2(1) and UFD-P6

¹⁹ Our District, our Future, July 2018, pp44-45

^{vi} Oxford: An economic profile for Oxford and the Wider Waimakariri District, 2015, p 11

^{vii} <https://www.stats.govt.nz/tools/2018-census-place-summaries/oxford>

^{viii} Definitions: 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.

For Waimakariri [District](#), the urban environment described in (a) and (b) comprises the towns of Rangiora, Kaiapoi, Woodend (including Ravenswood), Pegasus, Oxford, Waikuku, Waikuku Beach, The Pines Beach, Kairaki, Woodend Beach, the small towns of Ashley, Sefton, Cust, Ohoka, Mandeville, and all Large Lot Residential Zone areas

^{ix} Our Space 2018-2048, Greater Christchurch Settlement Pattern Update, July 2019

^x S42A Urban Form and Development at 74

^{xi} Email from Anne Babbage, WDC planner, 9/5/23

^{xii} S42A Overarching and Part 1 Matters at 66