

Proposed District Plan Submission

Submitter: Andrew Giles

Subject: Large Lot Residential Zone of 464 and 474 Mandeville Road

Reason for submission:

- Object to Large Lot Residential Zone of 464 and 474 Mandeville Road.

Outcome sought:

- That the zone of 464 and 474 Mandeville Road is changed to Local Centre Zone.

Reasons for submission:

- The sites are adjacent to the Mandeville LCZ. 474 Mandeville Road is isolated from other residential lots due to the Mandeville Road access to the retail village. Amenity and character within the sites is impacted on by the activities within and associated with the Mandeville LCZ. Adverse effects arising from activities within the Mandeville LCZ on amenity values within 464 and 474 Mandeville Road cannot be managed within the Mandeville LCZ due to the close proximity of the access road and commercial style buildings and lengthy interface with the Mandeville LCZ. Exclusion of 464 and 474 Mandeville Road from the LCZ results in an overall poor urban design outcome.
- Inclusion of 464 and 474 in the Mandeville LCZ is considered to provide beneficial outcomes with regard to the layout and functionality of the Mandeville LCZ. Extension of the Mandeville LCZ to include 464 and 474 Mandeville Road is a logical and easily integrated inclusion which will provide uniformity and logical boundaries to the LCZ.
- Restriction of activities within the Mandeville LCZ will not result in commercial activity dispersal resulting from inclusion of these sites in the LCZ.
- Inclusion of 464 and 474 Mandeville Road in the LCZ will assist with ensuring sufficient capacity is available to cater for retail and commercial services for the immediately surrounding area. The Waimakariri District has had high growth which is expected to continue, some of which will occur at Mandeville, and which needs to be provided for in the Proposed District Plan.
- RC205261 has been issued and provides for the establishment and operation of a hire yard at 464 Mandeville Road. This land use consent will be given effect to in the near future and establishes a commercial activity on this site which will integrate with and complement the retail activities in the existing Mandeville Village retail area. It is considered that this commercial activity would be better served by the LCZ to enable further integration of the site with those existing retail activities and to allow greater synergies and complementary activities. It also means that the existing residential activity at 474 Mandeville Road will appear somewhat incongruous in the adjacent commercial activity context.

Note: - This submission, although being referenced, was not addressed by either the S42a Officers, Andrew Willis or the Independent Consultant Mr Derek Fay.

1. INTRODUCTION

Qualifications and experience

- 1.1 My name is Derek Richard Foy. My qualifications are degrees of Bachelor of Science (in Geography) and Bachelor of Laws from the University of Auckland.
- 1.2 I am a member of the New Zealand Association of Economists, the Population Association of New Zealand, and the Resource Management Law Association.
- 1.3 I am a Director of Formative Limited, an independent consultancy specialising in economic, social, and urban form issues. I have held this position for two years, prior to which I was an Associate Director of research consultancy Market Economics Limited for six years, having worked there for 18 years.
- 1.4 I have 24 years consulting and project experience, working for commercial and public sector clients. I specialise in assessment of demand and markets, retail analysis, the form and function of urban economies, the preparation of forecasts, and evaluation of outcomes and effects.
- 1.5 I have applied these specialties in studies throughout New Zealand, across most sectors of the economy, notably assessments of housing, retail, urban form, land demand, commercial and service demand, tourism, and local government.

Code of conduct

- 1.6 Whilst I acknowledge that this is not an Environment Court hearing, I confirm that I have been provided with a copy of the Code of Conduct for Expert Witnesses contained in the Environment Court's Practice Note dated 1 January 2023. I have read and agree to comply with that Code. This evidence 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.

Scope of Evidence

- 1.7 I have been asked by Waimakariri District Council ("WDC" or "Council") to provide evidence regarding the economic effects associated with a number of submissions that request commercial or industrial zoning changes to the notified Proposed District Plan ("PDP").
- 1.8 This evidence reviews and responds to submissions that were identified in liaison with the reporting planner. I have not been asked to respond to all submissions requesting commercial or industrial changes, and some are responded to only by the reporting planner. The submissions that required review were:

- (a) 167 Beach Road Estates Limited
- (b) 222 Lifestyle irrigation

Note only referenced Nils Butlers
submissions
termed it "Butler Property"
not any reference to Andrew Giles submissions

end of the NPS-UD medium term (10 years). Zoning an additional 5.49ha as industrial would assist this sufficiency, and from a quantum of industrial land supply perspective I support the request.

- 7.5 I have seen no evidence that indicates the amount of the site that will be used for road upgrades, or the degree to which that will make the site unusable, or less usable for productive rural activities in the future. In the absence of any such evidence, I cannot provide any opinion on the degree to which this might support a conversion from rural zoning to an urban (industrial) zoning.
- 7.6 The other factor to consider is whether the Kerr site is an appropriate location for industrial activity. I note that it is adjacent to the large area of proposed GIZ in Southbrook, however that the Kerr site shares only a small (c.100m) frontage with that area of GIZ, and the GIZ proposed is on the opposite side of Townsend Road. While the layout of the Kerr site in relation to the larger area of GIZ is in some ways an urban design matter, there are some economics elements to the location of the Kerr site that require discussion.
- 7.7 First, the Kerr site is not surrounded by proposed GIZ, and shares only a short boundary with the proposed GIZ, and extends off the western end of that GIZ, sticking out into the surrounding RLZ. The 100m of boundary shared (albeit across Townsend Road) with the proposed GIZ is a small part of nearly 3km of boundary shared between the GIZ and the RLZ along the western edge of the proposed Southbrook GIZ. While the Kerr site is at the intersection of Townsend and Fernside Roads, and so is to some extent distinguishable from other parts of that rural-GIZ interface, there is little else to recommend the rezoning of the Kerr site in preference to other parts of that boundary.
- 7.8 Second, because of the shape of the Kerr site, and how it extends out into the RLZ, it would extend the boundary between the GIZ and the RLZ by around 1km (which is the perimeter of the Kerr site not adjacent to the PDP GIZ boundary). That would have the potential to increase reverse sensitivity effects on the GIZ, and potentially to adversely affect the efficiency with which activities in the GIZ might operate.
- 7.9 Third, extension of the GIZ-RLZ boundary by around 1km might also serve to increase pressure on converting other RLZ land to industrial zoning, further increasing potential for reverse sensitivity issues.
- 7.10 Ultimately, taking all these matters into account, my opinion is that the Kerr site could be suited to an industrial zoning, but that there are some factors which need to be taken into account that may counter that appropriateness.

8. NIK BUTLER (262)

WR 60's submission response

8.1 In this section I review the submission by Nik Butler, dated 26 November 2021. I have also reviewed relevant parts of the PDP and the most recent council assessments of business land to assist with context of the submission.

PDP
Proposed District plan?

Response to submission points

- 8.4 The notified PDP has already extended the area of commercial zoning of the Mandeville centre, by adding around 5,500m², nearly doubling the zoned area of the centre from the operative District Plan.¹³ That is a large increase in the centre area already, and there has been no evidence presented to indicate that any more expansion is required in addition to that already proposed.
- 8.5 There is no proposal for residential density in Mandeville to reach intensity levels achieved in urban parts of Waimakariri, although the PDP will decrease the minimum and average site size, and would enable a doubling of dwelling density. However, it is unclear how many existing parcels would be subdivided to take up that opportunity, so while there is some potential for additional residential density through the proposed LLRZ rezonings this is uncertain, and no evidence has been presented on the likely quantum of any associated dwelling increase. I note that there are several submissions that seek to create new areas of LLRZ around Mandeville, and to enable greater dwelling density in San Dona,¹⁴ however these provide little justification for a significant increase in zoned centre area at Mandeville. There is also no indication that the existing centre requires expansion to function efficiently as a local centre, and to provide the local community with the range of goods and services that are required for that local role.
- 8.6 I note that private Plan Change 31 (Ōhoka) proposed to rezone a large area (156ha) of rural land to residential zones, with some commercial zoned land. The Council decision was to decline that plan change, although that decision was appealed by the applicant, who is also seeking to have the area rezoned via a submission to the PDP. If that proposed development were to proceed, the commercial zone proposed there should (in broad terms) provide for that development's local commercial needs, and should not substantially rely on the Mandeville centre. In fact, as proposed for the PC31 application, the centres in the Ōhoka development would have been larger than required to fulfil a local centre role, and so would be unlikely to increase the need to service Ōhoka demand at Mandeville. The potential for PC31 is therefore in my opinion no basis for approving submission point 262.1.
- 8.7 From my involvement with PC31 and understanding of the local retail environment around Mandeville, I am not aware of any basis for rezoning 464 and 474 Mandeville Road as requested. In my opinion the proposed expansion of the Mandeville centre as notified would provide sufficient zoned area of the LCZ to appropriately provide for "the daily/weekly shopping needs of the local residential or nearby rural area, including enabling a range of convenience activities" (LCZ-O1).

¹³ 468 Mandeville Road (1.23ha) is the extent proposed to be LCZ under the PDP. Of that 0.55ha is the extension area, and 0.68ha is the original centre zoned area (including 800m² road entrance from Mandeville Road).

¹⁴ Although I understand there are requests to create new areas of LLRZ around Mandeville, including one to the north of Mandeville (submission 224.1) which might enable around an additional 90 dwellings, a similar sized area to the west (#296.1) and one much smaller area to the south-east.

Response to submission points

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Bullet point
8.5
Current recessionary mindset evident
This will CHANGE Growth will HAPPEN

Note

252. I understand that there are submissions seeking LLRZ in other parts of Mandeville.¹⁷ I also note that there are opportunities for increased residential development in the Mandeville area due to the increased density resulting from the Operative Plan's Residential 4B Zone becoming LLRZ in the Proposed Plan. However, full urban residential density has not been proposed and it is uncertain to what extent any increased density will be taken up by those affected by the changes, if accepted. Mr Foy (section 8.5) considers these changes provide little justification for a significant increase (beyond that already provided in the proposed Plan) in zoned centre area at Mandeville, noting no evidence has been presented on the likely quantum of any associated dwelling increase and that there is no indication that the existing centre requires expansion to function efficiently as a local centre, and to provide the local community with the range of goods and services that are required for that local role. [I note that if RIDL's [160] submission (being considered at Hearing Stream 12D) to rezone a large area at Ohoka was accepted, this proposal includes its own commercial centre and therefore does not rely on an enlarged Mandeville Village.]

253. I accept Mr Foy's evidence. I consider that insufficient justification has been provided by the submitters to extend Mandeville Village beyond the extension already provide for in the Proposed Plan. This additional extension is not required as part of a business capacity assessment. As such, I recommend that these submissions are rejected, as set out in Appendix B.

Edward and Justine Hamilton [165.1]: rezone 419 Whites Road, Ohoka from SETZ to commercial

254. I note that this is an urban to urban rezoning (SETZ to NCZ) and as such the NPS-HPL does not apply. The site is located within the existing urban area shown on CRPS Map A. No additional evidence was provided by the submitter to support this proposed rezoning. Given the small size of the site, the existing commercial activities operating from it and the fact that there are no other centres in Ohoka, I did not seek economic advice from Mr Foy on this submission.

255. I note that there is no existing area identified within Ohoka that is commercially zoned, however the SETZ itself provides for supermarkets, convenience retail and food and beverage outlets as permitted activities subject to scale standards, service stations are discretionary activities and industrial activity is non-complying. While these activities could establish within the SETZ, I accept the submitters' argument that the site is well located and that it could evolve into a more retail focussed business to provide more retail opportunities for the Ohoka village. I also note that the CMUZ framework anticipates neighbourhood centres that provide for a range of small scale activities to meet the convenience needs / support the immediate or nearby residential neighbourhood (e.g. CMUZ-P1(3), NCZ-O1 and NCZ-P1). I consider that as the site is small and already contains commercial activities that support the Ohoka community, rezoning the site NCZ is appropriate and there is unlikely to be any significant commercial distribution issues arising from the rezoning. Furthermore, there are unlikely to be additional amenity impacts from this change as NCZ activities are anticipated to occur within or adjacent to residential areas.

256. I note that RIDL [160] is seeking a significant rezoning in Ohoka (Hearing Stream 12D) which includes a large commercial area that is in close proximity to 419 Whites Road. If this rezoning

¹⁷ These are addressed in the Stream 12C LLRZ Rezoning s42A report.

WDC
growth in
area predictions

EXAMPLES OF CONVENIENCE RETAIL STORE TYPES

- Superette / Dairy / Mini-mart
- Fish shop
- Butcher
- Bakery
- Post Shop / Stationery
- Fruit & Vege Shop
- Delicatessen
- Cake Shop
- Ice Cream Parlour
- Liquor / Wine Shop
- Takeaways (Fish & Chips, Pizza, Chinese, Thai, Turkish, Indian, etc.)
- Cafés & Restaurants
- Video store
- Newsagent
- Pub / Bar
- Florist
- Gift Shops
- Pharmacy

EXAMPLES OF CONVENIENCE COMMERCIAL / PROFESSIONAL SERVICE ACTIVITIES

- Camera / Photography Shop
- Optometrist
- Locksmith
- Hairdresser
- Drycleaners
- Doctors
- Accountants
- Physiotherapists
- Medical practitioners
- Dentists
- Child care facilities
- Gym
- Lawyers

- Food retailing – grocery, delicatessen, bakery, butcher, specialist food
- Food & beverage – cafes, restaurants, takeaways
- Gymnasium
- Childcare
- Pharmacy
- Hairdressing
- Hardware, rural and garden supplies
- Recreational goods – riding supplies, etc
- Video rental stores
- Post Shop
- Real estate agents
- Travel agents

Figure 2: Convenience Store Types from Appendices D & F

464 Mandeville Road, Mandeville North
 2 LOT SUBDIVISION

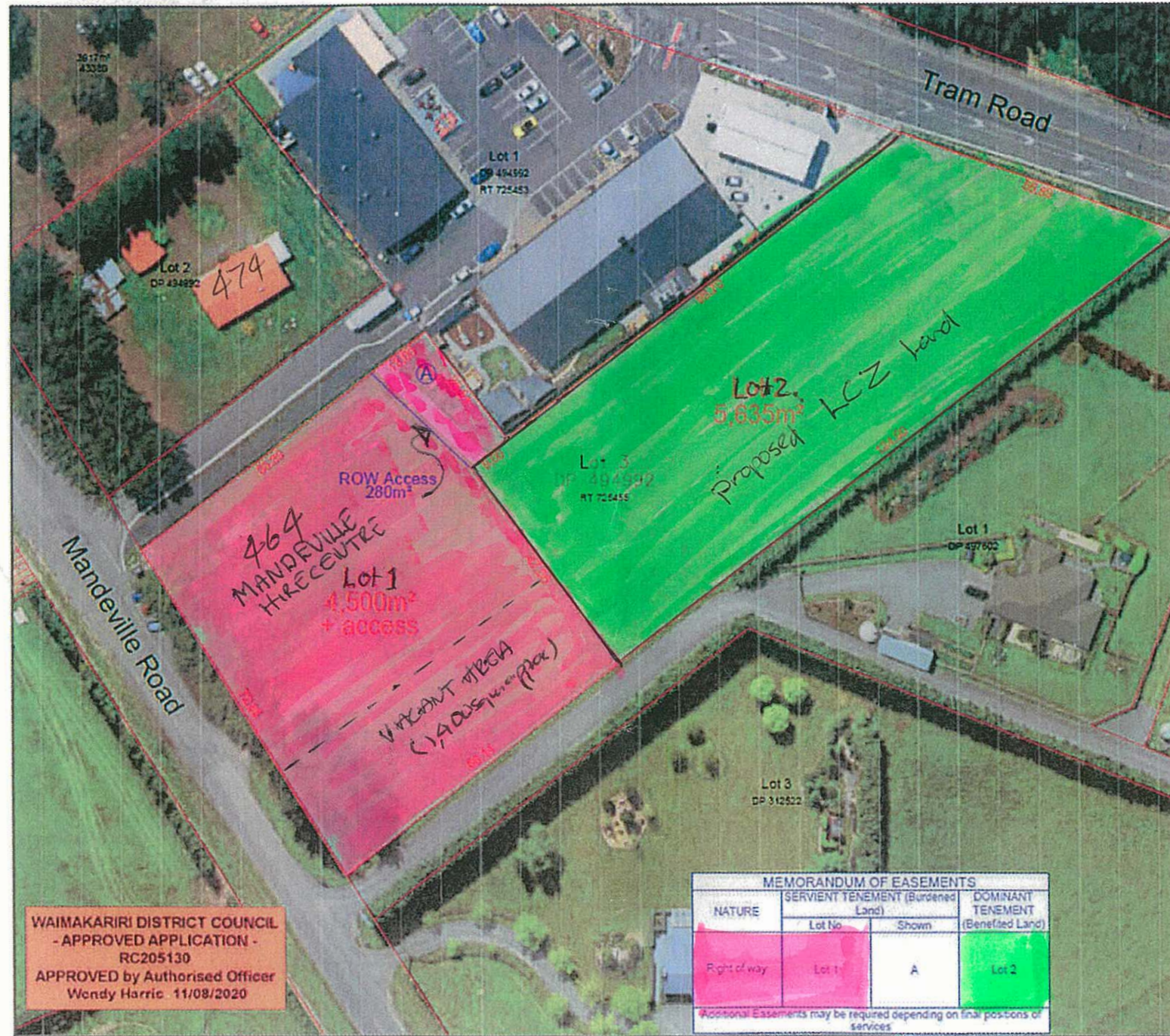


Figure 2: Approved subdivision layout (as per the subdivision plan for RC205130).

- 1 Note 1 Lot 2 Referenced by Mr Fay (8/4) as "adding 5,500sqm" (nearly doubling zoned area)
- 2 Actual available surplus for retail/serve activities only a very small % of this "nearly doubled area"
- 3 Row to be re-zoned is actually part of 464 Mandeville Rd Title

LEGEND

- A** Boundary Hedge (to match existing)
- B** Grassed Area
- C** Existing Pine Planting
- D** Landscape Rock
- E** 1.8m Timber Fence
- F** 1.8m Security Fence
- G** Proposed Signage

PLANTING PALETTE

- 1** Native Grass Mix:
Pratia angulata
Chionochloa rubra
Hebe sp
- 2** Street Trees:
Plagianthus regius
- 3** Access Way Trees:
Muehlenbeckia astonii
Kunzea ericoides
- 4** Native Strip:
Fuscosora solandri
Kunzea ericoides
Pratia angulata
Chionochloa rubra
Hebe sp
- 5** Boundary Planting:
Muehlenbeckia astonii
Cortaderia richardii
- 6** Hedging (To match existing):
Cupressus arizonica



A. LANDSCAPE CONCEPT PLAN 1:300

Environment Canterbury Regional Council; Hurunui District Council; Waimatara District Council; Timaru District Council

client / project name: GILES - 464 MANDEVILLE ROAD
drawing name: LANDSCAPE CONCEPT PLAN
designed by: Tom Morrison
original issue date: 10 JUNE 2020
scales: 1:200

revision no:	amendment	approved	date
B	Design Changes	DCM	15/06/2020
C	Design Changes	DCM	17/06/2020

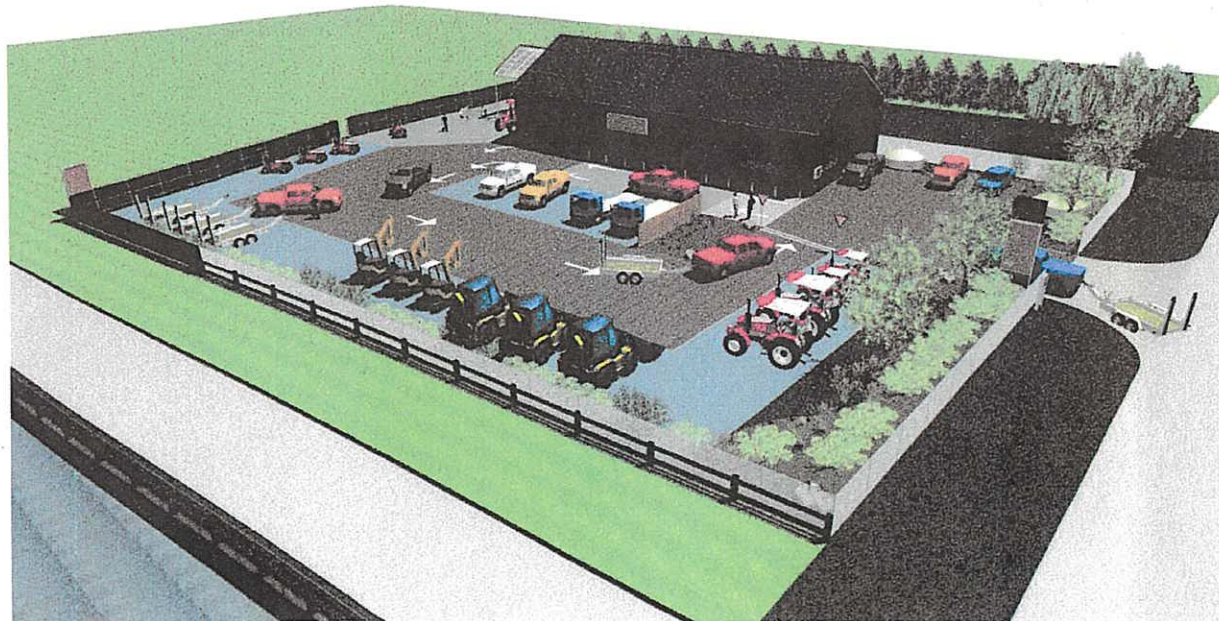


DCM URBAN DESIGN LIMITED
3/329 DURHAM STREET NORTH
CHRISTCHURCH 8013
WWW.DCMURBAN.COM
021 114 0337

project no / drawing no: 2020_052/ 0001

revision: C

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1 001
Scale NTS

WAIMAKARIRI DISTRICT COUNCIL
 - APPROVED APPLICATION -
 RC205261
 APPROVED by Authorised Officer
 Wendy Harris 1/11/2021

REFER LANDSCAPE PLAN FOR ADDITIONAL INFORMATION



2 002
Scale NTS

Structural Engineers 77

Boyd Chamberlain
ARCHITECTURE LTD

P: 03 366 0056
M: 021 83 62 62
E: design@bca.co.nz

PG BOX 9299
CHRISTCHURCH 8149



USE ONLY THE "BUILDING CONSENT AUTHORITY" APPROVED DRAWINGS & ASSOCIATED DOCUMENTATION FOR CONSTRUCTION

DRAFT FOR APPROVAL

PROJECT TITLE :
PROPOSED HIRE CENTRE
464 MANDEVILLE ROAD, MANDEVILLE NORTH

ALL DIMENSIONS SHALL BE CHECKED AND VERIFIED BEFORE ANY CONSTRUCTION COMMENCES. USE PUBLISHED DIMENSIONS ONLY. DO NOT SCALE FROM THIS DRAWING. ALL WORK TO COMPLY WITH THE CURRENT EDITIONS OF THE NZ BUILDING CODE & REFERENCED STANDARDS AT THE TIME OF CONSTRUCTION.

Rev:	Date:	Note:	PRINTED: 19/10/20	PAGE: A2	SHEET No:
			SCALES: AS SHOWN		P1.5
			DRAWN: MB	JOB No: 16190	
			SHEET TITLE: PERSPECTIVE		OF: 36 REV:

Mandeville Car Parking - Option One



191129168076

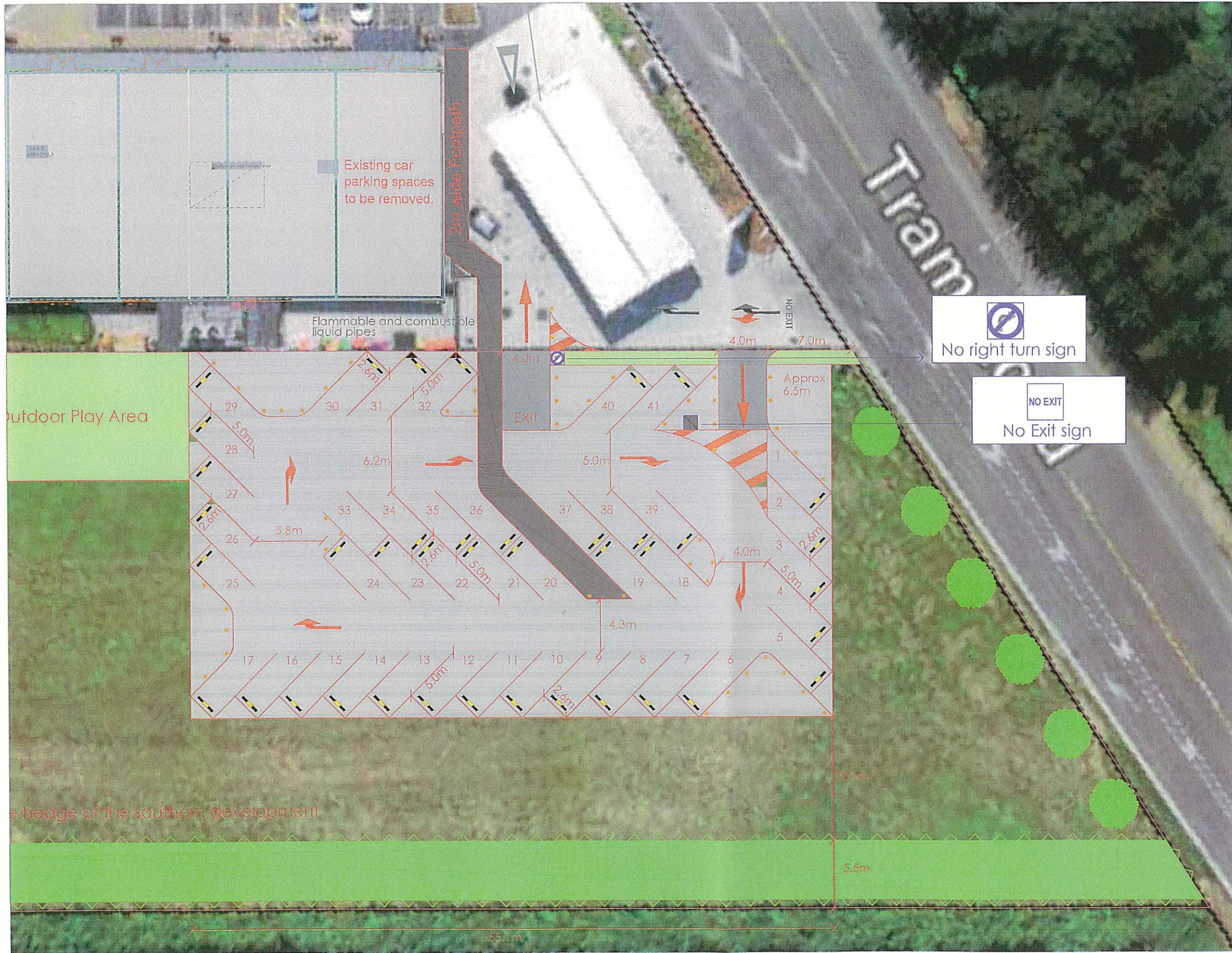
Appendix 'B' WDC "parking option #1" waimakariri.govt.nz

Notes - 1 Now in existence
2 Not formed to an all weather standard and as such not considered to be a viable year-round parking "overspill" supply option



Mandeville Carparking WDC Option #3

- New carpark on private land (464 Mandeville Rd)
- In conjunction with designation change to allow for amenity activities at the Reserve.



Urbis TPD Limited
 Level 1, 30 Southwark Street,
 Christchurch 8145

Urbis
 traffic planning and development

Rev	Date	Description
VI	03/06/2021	Parking Layout 6

General Notes

Sourced from:
 Apollo Projects
 Date - 17/07/2017
 Project No. - 1694
 Sheet No. - A - 001
 Issue - RC Revision
 Revision - A

Urbis TPD Ltd
 Mandeville Village
 Stage 2

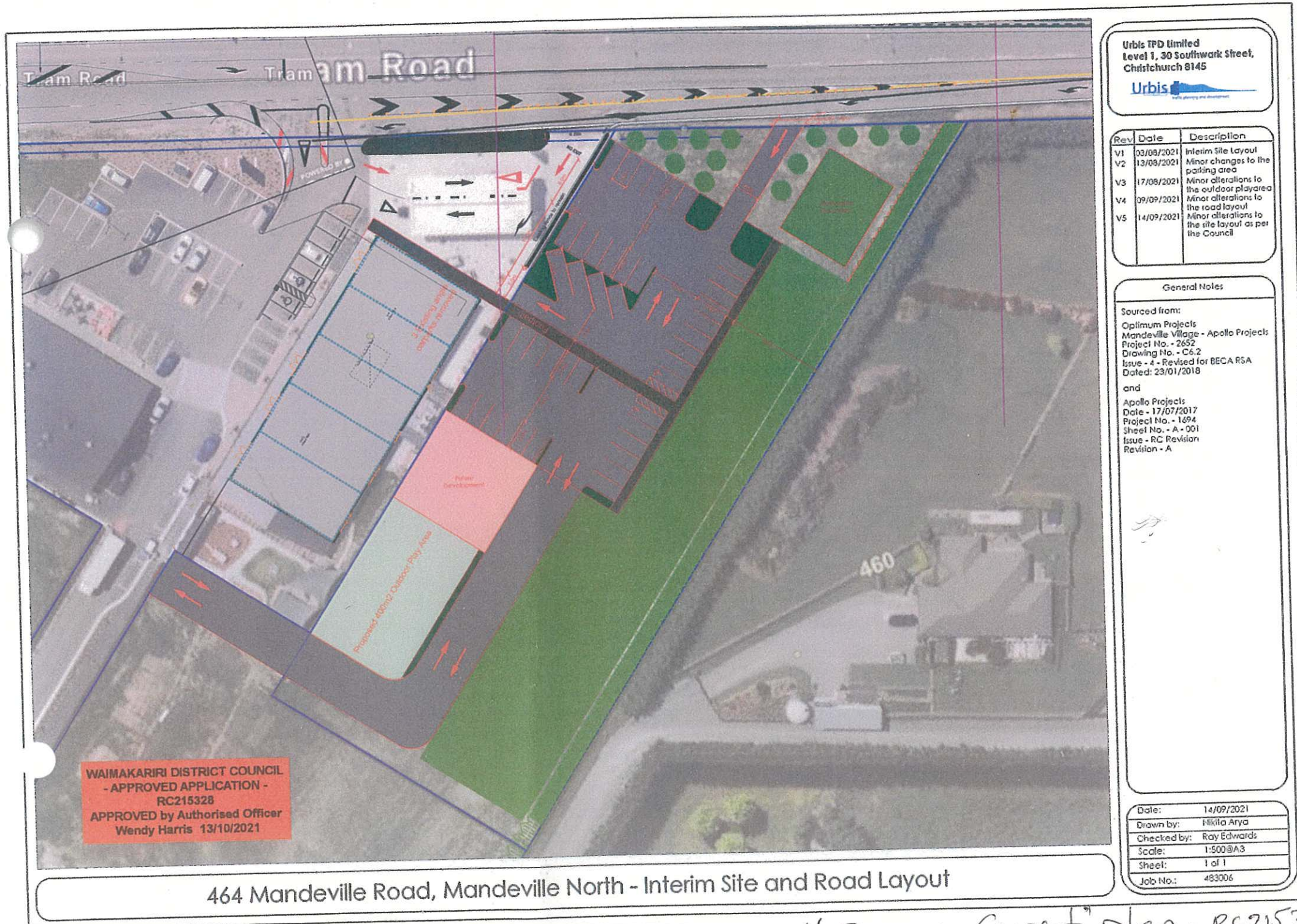
- Proposed Preschool's Outdoor Play Area= 400m²
- Proposed car parking spaces = 36 (marked in red)

- Proposed hedge
- Proposed hedge under RC205261
- Indicative location of trees
- Proposed footpath
- Proposed sealed areas
- Proposed gravelled area
- Wheel stops
- Ballards/ vehicle barriers

Date:	03/06/2021
Drawn by:	Nikita Arya
Checked by:	Ray Edwards
Scale:	1:300@A3
Sheet:	5 of 5
Job No.:	483006

464 Mandeville Road, Mandeville North - Proposed Preschool - Parking Layout 6 - 41 spaces

Appendix 'F' Proposed Carpark Extension Plan



WAIMAKARIRI DISTRICT COUNCIL
 - APPROVED APPLICATION -
 RC215328
 APPROVED by Authorised Officer
 Wendy Harris 13/10/2021

Urbis TPD Limited
 Level 1, 30 Southwark Street,
 Christchurch 8145
 Urbis
 urban planning and development

Rev	Date	Description
V1	03/08/2021	Interim Site Layout
V2	13/08/2021	Minor changes to the parking area
V3	17/08/2021	Minor alterations to the outdoor play area
V4	09/09/2021	Minor alterations to the road layout
V5	14/09/2021	Minor alterations to the site layout as per the Council

General Notes

Sourced from:
 Optimum Projects
 Mandeville Village - Apollo Projects
 Project No. - 2632
 Drawing No. - C6.2
 Issue - 4 - Revised for BECA RSA
 Dated: 23/01/2018
 and
 Apollo Projects
 Date - 17/07/2017
 Project No. - 1694
 Sheet No. - A - 001
 Issue - RC Revision
 Revision - A

Date:	14/09/2021
Drawn by:	Hikila Arya
Checked by:	Ray Edwards
Scale:	1:500@A3
Sheet:	1 of 1
Job No.:	493006

464 Mandeville Road, Mandeville North - Interim Site and Road Layout

As 'approved' Resource Consent plan, RC215328
 Note 1 providing additional 'overflow' carparking
 2 current operators extension provision



Urbis TPD Limited
 Level 1, 30 Southwark Street,
 Christchurch 8145

Urbis
 town planning and development

Rev	Date	Description
V1	03/12/2019	Stage 2

General Notes

Sourced from:
 Apollo Projects
 Date - 17/07/2017
 Project No. - 1694
 Sheet No. - A - 001
 Issue - RC Revision
 Revision - A

*SWRA,
 Stormwater Retention Area*

Date:	03/12/2019
Drawn by:	Nikita Arya
Checked by:	Ray Edwards
Scale:	1:500@A3
Sheet:	1 of 1
Job No.:	483006

Mandeville Village - Stage 2 - 400m2 Extended Supermarket & New Retail Building (85 spaces in total)

*Appendix 'E' plan of "Indicative Future Site Development"
 Note :- Essentially only provision for 288sqm extra space*