

Before the Hearing Panel
Appointed by the Waimakariri District
Council

Under the Resource Management Act 1991

In the matter of a hearing on submissions on the proposed Waimakariri District
Plan

Hearing Stream 12E: Residential Rezoning

Rachel Claire Hobson and Bernard Whimp

Submission: 179 / Further submission: 90

Supplementary evidence of Bryan John McGillan

2 August 2024

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**anderson
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Introduction

- 1 My name is Bryan John McGillan.
- 2 I have prepared evidence in chief dated 5 March 2024 in respect of the submission of Rachel Claire Hobson and Bernard Whimp (**the Submitters**).
- 3 My qualifications and expertise are set out in my evidence in chief.

Code of Conduct for Expert Witnesses

- 4 While this is not a hearing before the Environment Court, I confirm that I have read the Code of Conduct for expert witnesses contained in the Environment Court of New Zealand Practice Note 2023 and that I have complied with it when preparing my evidence. Other than when I state I am relying on the advice of another person, this evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

Scope

- 5 This supplementary evidence responds to the Officer's Report for Stream 12E: Residential Rezoning, dated 22 July 2024, in relation to planning matters.
- 6 The Officer recommends that the submission seeking rezoning be rejected. I address the following particular issues relied on by the Officer:
 - a. Anticipated development, direction of urban growth and connectivity
 - b. Responsive planning and policy assessment

Response to Officer's Report

Anticipated development, direction of urban growth and connectivity

- 7 The Officer considers that the proposal is an unanticipated development. I disagree. While the land is not identified for development in the CRPS Map A or the PWDP Future Development Areas (which reflect the CRPS), future development of eastern Rangiora has been clearly signalled in the Waimakariri 2048 District Development Strategy as shown in figure 1.



Figure 1. Waimakariri 2048 District Development Strategy. The site (red circle) is within the proposed residential growth direction to the east.

- 8 While the Officer is concerned that the proposal would push development beyond what he considers to be a logical boundary (paragraph 528), this direction of development, across the site and beyond, has previously been anticipated and endorsed by WDC.
- 9 That direction of growth has clearly been appreciated by other submitters also. Significant rezoning has been proposed to the north and east of the Submitters' site (submission 278) for a lifestyle village. Other submissions request large lot residential zoning, all signal potential change to the amenity of the area could be anticipated.
- 10 I also note that the CRPS is currently under review and due to be notified in December of 2024. Review of the CRPS will be informed by the recently confirmed Greater Christchurch Spatial Plan (GCSP) (2023).
- 11 The GCSP identifies enhancement of public transport routes which include the Rangiora-Woodend Road which is directly to the south of the applicant's site. It also proposes a green belt of ecological enhancement to the west and south of Rangiora leaving eastern Rangiora as the obvious direction of future growth.

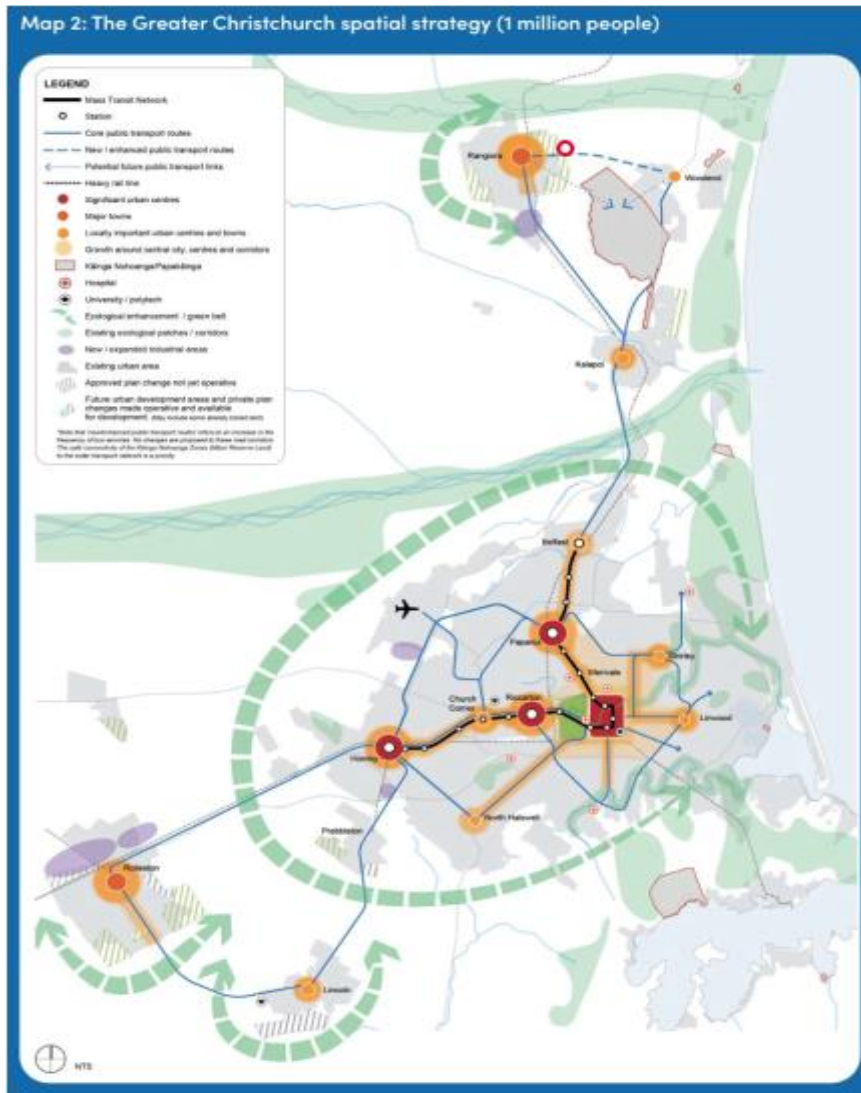


Figure 2. Draft Spatial Plan for greater Christchurch showing wider future growth and investment aspirations for wider Christchurch including Rangiora and other satellite towns in the district (Urban Growth Partnership for Greater Christchurch, 2023). The red circle denotes the site.

- 12 The Officer has recommended that significant rezoning be approved to the immediate west and south of the site. If that recommendation is confirmed, the site will be directly adjacent and connected to the Rangiora urban area. While there is potential for development of the site to proceed before some other areas located between the site and the rest of Rangiora, I consider that would be a temporary situation, and note that the Bellgrove development is already proceeding at pace.
- 13 I do not share the Officer's concerns regarding transport connectivity and reliance on an arterial road. This issue is further addressed by Mr Leckie and I rely on his evidence in this regard. I also

consider that development concentrated along a “primary road” is advantageous in terms of creating demand for future public transport service and walking and cycling facilities.

Responsive planning and policy assessment

- 14 Mr Wilson does not consider that Policy 8 of the NPS-UD is applicable as he considers the proposal does not provide significant development capacity. This view is contrary to that of Ms Hampson who makes the following statement in her evidence.

“The submitter’s land is located within the proposed direction of long term expansion as shown in the Waimakariri 2048 District Development Strategy. This site is in a good location which would contribute to well-functioning urban environment and would be significant, which would meet the requirements of Policy 8 of the NPS-UD.”

- 15 Mr Wilson has outlined in Paragraph 528 that the rezoning “may not offer significant development capacity, being a comparatively small area of land in contrast to the bigger developments to the west. I do not consider it provides significant development capacity, certainly not when compared to other developments further west”.
- 16 I strongly disagree, planning instruments and ODPs do not alone unlock development, there are important intermediary considerations. These include: capability of the landowner to develop, number of developers involved, funding for the development, and the number of land parcels involved.
- 17 The submitter and associated entities have the experience and resources necessary to undertake a development of the scale proposed in the submission. They are motivated and focused on enabling additional housing capacity, with only two parcels making up the site.
- 18 In reality, from my experience with the process from rezonings to issue of titles, in numerous Private Plan Change applications and district plan submissions, this is almost always more relevant than the actual size of the ‘ODP Area’, in so far as bringing housing to the market efficiently to meet market demand.
- 19 While some overall ODP areas appear larger, from experience they often have issues with implementation and construction due to segregated ownership. The applicants’ proposed development is anticipated to be in a position to more readily progress development along this strategic route than other ODPs that are made up of smaller parcels and multiple landowners.
- 20 Mr Wilson does however concede that Policy 8 should be interpreted in light of Objective 6 of the NPS-UD, which does not require that proposals supply significant development capacity.

- 21 Policy 6 of the NPS-UD which supports Objective 6 is also of relevance and considers the benefits provided by a well-functioning urban environment against any detractor that may occur to existing amenity values appreciated by some people.
- 22 The section 32AA evidence submitted in December 2023 and the evidence in chief submitted on 5 March 2024 supports the proposal as capable of achieving a well-functioning urban environment.
- 23 I agree with Mr Wilson that CRPS 6.3.11 (5) is a useful guide but not the only consideration in what a well-functioning urban environment constitutes. I however consider the site does meet the relevant criteria of CRPS 6.3.11(5). Responding to the issues raised by the reporting officer:
- a. *"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."*
 - i. The application site is located 330m from Rangiora's built environment and a 20-minute walk from the town centre. This equates to approximately 1 mile (1.6km).
 - ii. Nearby facilities include sport and recreation sites, nature reserves and Ashley Rakahuro Regional Park.
 - iii. The centre of Rangiora, Rangiora High School, Proposed childcare centre (Bellgrove) appear closer to the submission site by some 500m.
 - b. *"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."*
 - i. The site is contiguous with areas recommended for rezoning to the west and south. The proposed ODP provides for integration and connectivity with the two adjacent ODPs. Rezoning through the PDP ensures that through connections can be considered and appropriately provided for prior to the development pattern for any of the land being confirmed or constructed.
 - ii. It is also noted that areas to the west are often further from the centre of Rangiora and lacking in good arterial connection.
 - c. *"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."*

- i. As detailed previously growth to the east of Rangiora is a logical extension as proposed in the 2048 WDDS. Separation with other areas can be maintained.
- d. *"It may affect the operational capacity of the strategic Rangiora-Woodend Road."*
- i. I rely on the evidence of Mr Leckie that Rangiora-Woodend Road is not an especially busy road for an arterial, and the new intersection to provide access to the site will be able to operate satisfactorily, with minimal impact on the through-traffic carrying function of the road.

Conclusion

- 24 I remain of the view that the site presents a logical and appropriate location for urban growth, that is aligned with the WDDS and GCSP.
- 25 The site meets policy direction in the CRPS and GCSP for sites which are appropriate for greenfield growth. I consider that responsive planning, as anticipated by the NPS-UD, is appropriate in respect of this site.
- 26 Rezoning the land now will give certainty to areas that are anticipated for residential development and would also be contributing towards provision of housing capacity. The submitters have advised they have the experience, resources and will to progress this development. This is consistent and relevant to the assessment criteria in the MfE Guideⁱ.
- 27 Rezoning now will also ensure that the ODPs for development areas in east Rangiora area appropriately integrated, as further addressed in the evidence of Jade MacFarlane.

Dated 2 August 2024



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ⁱ <https://environment.govt.nz/assets/Publications/Files/Understanding-and-implementing-responsive-planning-policies.pdf>