

Waimakariri District Council
Attn: Waimakariri District Council Hearing Stream
12 s42A Reporting Officers
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W-REF: P21-414
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20 Te Haunui Lane, Pegasus - Memorandum in support of submission for rezoning (Submission #191)

Attn: Waimakariri District Council Hearing Stream 12 s42A Reporting Officers

1. Purpose and background

This memorandum has been prepared to provide technical evidence to support the submission prepared on behalf of Howard Stone, dated 21 November 2020, to the Proposed Waimakariri District Plan (**PWDP**) (Submission #191).

The Howard Stone submission sought to rezone a 3.81ha portion of the submitter's 16.061ha block of land at 1188 Main North Road / 20 Te Haunui Lane, Pegasus (the 3.81ha portion to be referred to in this memo as the "**Subject Site**"). Specifically, the submission requested that:

- The Subject Site be rezoned from Rural Lifestyle Zone (**RLZ**) to Special Purpose Zone Pegasus Resort (**SPZ(PR)**); and
- The SPZ(PR) – APP1 – Outline Development Plan (**ODP**) be amended to include the Subject Site within the "Activity Area 7: Residential".

Consequential to the proposed rezoning, the following changes are sought to the PWDP provisions in relation to the SPZ(PR):

- It is unclear what minimum lot size is proposed for SPZ(PR) Activity Area 7 in Table SUB-1. The PWDP line item adjacent to "SPZ (PR) All Other Areas" states 'no minimum' however this could be editing error as the lines do not align with the corresponding allotment sizes in the next column. If a plan editing error is in play and the line is askew, this would mean that a minimum 4ha area applies to Activity Area 7. A minimum allotment size of 4ha is not in keeping with the existing pattern of subdivision within Activity Area 7 of the ODP, and assumes that there is no further development potential in the Activity Area 7. Therefore, we suggest that under Part 2 District-wide matters Subdivision SUB – Wawahia whenua - Subdivision:
 - Amend Table SUB-1 to provide for a minimum allotment area of 1,500m² on the part of LOT 2 DP 80926 identified as SPZ(PR) and Activity Area 7; and
- Under Part 3 Area specific matters: SPZ - Whaitua motuhake - Special Purpose Zones - PR - Pegasus Resort, amend Standard SPZ(PR)-BFS6 (Buildings and structure setbacks), to specify the following setbacks on the part of LOT 2 DP 80926 identified as SPZ(PR) and Activity Area 7:
 - Any building or structure shall be no less than 10m from any road boundary
 - Any building or structure shall be no less than 4m from any internal boundary

- Consequential changes to the Part 3 SPZ(PR) policy framework to remove wording relating to “existing residential” to reflect that this submission will entail future proposed development. Wording should state “~~existing~~ residential”.

The purpose of the Submitter’s request is to enable additional residential development facilitated by the SPZ(PR) and ODP Activity Area 7 on the Subject Site through the provision of 12 lots adjacent to the Pegasus Resort golf course. We have prepared an indicative scheme plan to show a possible site layout and yield - see **Figure 1** below and **Appendix 1**. We consider this to be a more favourable and appropriate zoning for the Subject Site for the following key reasons:

- Gives effect to regional growth aspirations;
- Supports the wider objectives and policies of the PWDP;
- Reflects the objectives and policies of the SPZ(PR) zone;
- Ensures cohesivity with the Pegasus Resort ODP;
- Utilises the existing infrastructure provision to the site;
- Expert advice confirms that there are no land capability, infrastructure, servicing, flooding or geotechnical constraints that would prevent the rezoning; and
- The proposal is consistent with the character and pattern of development of large lot residential development and subdivision within the Pegasus area.



Figure 1: Indicative Scheme Plan Layout at 20 Te Haunui Lane, Pegasus

This memo considers the matters raised in the ‘Memo to Rezoning Submitters’ issued by Waimakariri District Council (**WDC**) dated 12 December 2023 as they relate to this rezoning proposal. These matters are:

- Infrastructure, servicing and flooding;
- Geotechnical;
- Land use capability;

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- Rural character;
 - Effects on tanga whenua values;
 - Reverse sensitivity; and
 - Planning and policy context.

2. Site History

By way of background, Pegasus town development commenced in 2006, with a residential housing subdivision, and supporting facilities such as a commercial centre, worldclass golf resort and relocated primary school establishing in the proceeding years. The Subject Site is adjacent to the southwest boundary of the Pegasus Golf Course.

Given the proximity to the Pegasus development, consideration was given to future servicing of the Subject Site at the time of the original Pegasus subdivision. This included establishing a 5m x 15m Right of Way (**ROW**) accessed from Te Haunui Lane which is sufficient width to be a legal road, and wastewater / water servicing to the development to accommodate a 12 lot subdivision (refer to **Appendix 2** Servicing Memo). This context is important as it sets the scene that development of this 3.81ha area of land to accommodate the residential allotment size proposed by this submission had already been anticipated for the future. The PWDP process provides the opportunity to capitalise on the existing infrastructure already available and the anticipated development potential of the Subject Site by the original Pegasus Subdivision. We also highlight that principally for these reasons, the extent of the rezoning request relates to only a small 3.81ha portion of the submitter's overall 16.018ha land holding.

3. Infrastructure, servicing and flooding

A servicing memorandum has been prepared by Wood and Partners Limited dated 13 December 2023 and is attached as **Appendix 2** to this memo. In summary, the proposal can be appropriately serviced because:

- Access to the land will be provided by an existing ROW off Te Haunui Lane, established via an agreement between the original developers of the Mapleham and Pegasus areas. A new road or right of way can be constructed in this location to service 12 lots in accordance with the current council standards as shown in **Figure 1 / Appendix 1**;
- With respect to flooding, the site levels range from RL 8.3m to RL 9.0m, whereas the minimum floor levels for adjacent dwellings in Te Haunui Lane are being set above RL 6.0m. Council's flood modelling indicates there would be some isolated ponding of less than 300mm for a 200 and 500 year storm event over a small part of the site. The flooding constraint on the site is considered to be small in extent, and can be addressed through the design of earthworks, dwellings and access to avoid, remedy and mitigate the risks of flood hazards to future occupants and the surrounding land;
- In terms of contamination, an enquiry was made on the Ecan website and there are no known contamination issues on the site. At the time of subdivision, a PSI can be undertaken and if required a DSI to determine if soil remediation is required;
- Stormwater from the existing lots in Pegasus/Mapleham is generally treated with road-side swales and discharges into various soakage and waterways that traverse the golf course. Future development of impervious areas on the Subject Site can be serviced by disposal of stormwater to ground, consistent with this approach. A number of stormwater management options are available to provide treatment and detention prior to discharge to existing water bodies or soakage/ground;
- There is an existing public wastewater reticulation available in Te Haunui Lane comprising a 75mm MDPE main which connects to a 160mm MDPE main located in Pegasus Boulevard. The

wastewater modelling supporting the original Pegasus/Mapleham subdivision was calculated and designed to accommodate flows from 12 residential lots on the Subject Site;

- There is an existing reticulated water system available from Te Haunui Lane and is also located throughout Pegasus/Mapleham. Consultation with the Council Engineers has confirmed that the existing water network has capacity to service the development area; and
- In terms of utilities, power and telecommunications are located in Te Haunui Lane and can be extended to service the land proposed to be rezoned. A gas valve and pipe to the boundary has been installed to service this land.

4. Geotechnical

A geotechnical appraisal report has been prepared by Engineering Design Consultants, attached as **Appendix 3** to this memo. Overall, the report finds that the subject site's geotechnical conditions are suitable to support the rezoning and land use proposed noting that:

- No geological faults are mapped on or within close proximity to the site and therefore the risk of rupture on the site within a design seismic event is considered negligible.
- The ground generally comprises soils of low compressibility; however softer clay soils are observed on the site, correlating to the overland flow area. However, the presence of potentially compressible soil does not preclude the use of the site as residential land from an engineering perspective, and further investigations at the resource consent stage are recommended.
- With respect to liquefaction risk, no risk of lateral spreading was identified under Serviceability Limit State (**SLS**) conditions, with less than 20mm identified under ULS conditions. Based on the above an MBIE Technical Foundation Category of TC 2 and the MBIE planning guidance classification of 'Liquefaction damage is possible – Medium' is considered to apply. However, this higher classification is only driven by the ULS performance of 3 of the 6 CPT's. As such, with additional investigation and knowledge of the earthworks, it is possible that areas of TC 1 and 'liquefaction damage is unlikely – low' can be defined at Resource Consent stage.
- The site is generally flat. It is considered that the slope instability risk is generally low, though cannot be discounted. However, given the likely 30m development off-set from the creek, any future slope failure is unlikely to significantly impact upon the site. If required, further investigation and qualitative analysis can be undertaken at Resource Consent stage.
- The risk of erosion is considered to be low as no erosional features have been noted, and historical aerial photos do not suggest the embankment has moved significantly since the 1940's.
- In terms of flooding, Waimakariri District Council information indicates that the 1 in 200 year flood risk to the site is generally negligible, with only two small areas indicated as being within the Low category.

5. Land use capability

An agricultural land use assessment for the site has been prepared by Dunham Consulting, attached as **Appendix 4** to this report, which reviews and considers the potential agricultural uses of the site, based on the capability of the land and technical and economic feasibility of agricultural activities.

In terms of land use capability, the report finds that:

- The land proposed to be rezoned contains soils identified as LUC 2w-1, meaning "Land with slight limitations for arable use and suitable for cultivated crops, pasture or forestry", but with "soil wetness resulting from poor drainage or a high-water table, or from frequent overflow from streams or coastal waters first limits production".

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- The majority of soils on the site (90% on the total cadastral lot) are mottled Kaiapoi soils, which indicates that there are periods of restricted profile drainage. These soils are formed from high groundwater tables and are imperfectly drained. Furthermore, the soils have rapid permeability of water in the top 20-25cm, meaning that excess water will move quickly through this top layer and perch on top of the moderate permeability layer below. In practice this means that roots in the topsoil layer can be slightly dry, while roots below 25cm are impacted by being too wet.
 - As a result, on winter wet soils, green feed crops are more difficult to consume efficiently with higher wastage and more potential topsoil structure damage. Arable cropping for grain & seed production will be significantly limited or infeasible.
 - In summary, primary production on the Subject Site is limited to livestock, with horticulture options being ruled infeasible by winter wet soils, late spring growth, and dry summer to late-autumn soil moisture deficits. Arable crop options are limited to late spring sown feed cereals.

In terms of land use productivity, the report finds that:

- The Subject Site is a relatively small land holding, and given the existing traffic conditions and proximity to residential activities, most contractors (i.e. for cultivation & drilling, chemical spraying, harvesting, stock trucks, fertiliser application) would be unwilling to put up with the difficulties of managing traffic and potential mud and noise pollution issues.
- As a result of nuisance effects from agricultural chemical spraying, dust from land cultivation and fertiliser spreading, and noise pollution from machinery and vehicle use, it is expected that primary production activities will have direct impact on all 41 immediate and close neighbouring residences, as well as 12 residences along the route through Pegasus.
- The Subject Site is dryland and has no current source of stock water, mains electricity, or stock yards, and irrigation consents are highly unlikely to be granted on the site, excluding future horticulture or viticulture options. Even if granted, irrigation would incur high capital costs.
- Four technically feasible options are identified, being dry-stock sheep, dry-stock cattle, mixed cropping and sale of hay and baleage. However, none of the options are considered economically viable when considering the likely return from investment and capital costs associated with infrastructure improvements and purchasing livestock.

The report concludes by stating:

The small scale of the site, high vulnerability of the soils to structural damage from high water tables, marked summer drought periods, late spring crop establishment timing, restrictive site access for contractors, very low chance of obtaining irrigation water consents, as well as very expensive irrigation infrastructure means that there is no long term economically viable primary production land use for this site.

In addition to these findings, it is noted that the proposed zoning of RLZ under the PWDP enables rural-residential activity including the development of dwellings on sites greater than 4ha, one minor dwelling per site, small scale visitor accommodation, and subdivision to create lots of at least 4ha. Approximately four rural-residential sites could potentially be subdivided and developed on the wider subject site under these provisions. The development of rural-residential activities and associated subdivision under the RLZ provisions proposed within the PWDP would result in land fragmentation. Compared to this proposed RLZ, the proposed SPZ(PR) zoning sought under the Howard Stone submission and consequential changes set out in this memo would not present any additional effects on highly productive land.

6. Rural Character

It is acknowledged that the rezoning would enable a change in character from rural and rural-residential under the RLZ to large lot residential enabled under the SPZ. However, the effects of this change will not be significant because:

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- The Subject Site is small in scale, and future development under the SPZ(PR), will visually integrate with the existing large lot residential character of the Pegasus residential subdivisions, whilst being perceived as a small extension of this subdivision. The indicative scheme plan (**Appendix 1**) proposes a pattern of development involving a single band of allotments alongside a central road spine, which reflects the pattern and character of large-lot residential subdivision in the Pegasus Resort area.
 - Sites to the southwest and northwest are peri-urban, with small pockets of rural land containing paddocks, boundary planting and watercourses, interspersed between established and newly emerging residential suburbs of Woodend and Ravenswood, as well as the Pegasus Golf & Sports Club. The immediate Pegasus area is a unique golf course setting associated with its location amongst the world class Pegasus golf course and resort. Established high quality and large scale housing fronts onto the golf links with outlook and living spaces oriented to take in the manicured views of open fairways.
 - The surrounding landscape is that of flat terrain, and therefore views vantage points from the surrounding rural area to the Subject Site are limited. In particular, there are no views from any prominent public vantage points to the site, particularly along Main Road from which a rural outlook over 1188 Main Road will be maintained.
 - In addition, rural land to the south of the Subject Site has previously been identified for the Woodend Short Eastern Alignment Bypass, an extension to State Highway, forming part of the SH1 North Canterbury Corridor. Whilst the design and status of this project is uncertain, the presence of a highway would inevitably result in a significant change to the existing rural character.
 - It is also noted that the Wai Hora stream adjoining to the south provides a natural boundary for urban expansion, as further suburban development beyond this boundary would require more comprehensive servicing arrangements to provide access, water and wastewater infrastructure to such development.
 - It is also noted that the PWDP envisages a change in character of the Subject Site and surrounding rural area from that of rural production (paddocks) to a rural-residential character, as promoted by the RLZ. Specifically, by providing for 4ha site sizes, the RLZ will enable rural-residential lots to establish resulting in a rural landscape characterised by a higher proportion of buildings, structures, paved areas and other built elements, in addition to noise, and glare from vehicle movements. Within this context, the change in character from rural-residential to large-lot residential promoted through the submission is not considered to be significant.
 - The 16.018ha land holding to the northwest of the Subject Site is owned by the submitter and zoned RLZ under the PWDP. By retaining this RLZ zoning on the remainder of the client's landholding, we consider that this reflects the intention of the Pegasus Resort ODP and pattern of development and is in keeping with the peri-rural character and amenity of this area.

Within this context, low-intensity residential development on the Subject Site enabled by the SPZ(PR) is unlikely to result in significant effects on the established character of the area.

7. Effects on tanga whenua values

The proposed rezoning and consequential changes to provisions were sent to Ngāi Tūāhuriri and Mahaanui Kurataiao Ltd on 1 March 2024 with an invitation to provide feedback by 22 March 2024.

Woods have discussed the rezoning of the site with Henrietta Carroll, General Manager of Mahaanui Kurataiao Ltd who stated that mana whenua has a clear position on provision of adequate setbacks from watercourses. As discussed with Ms Carroll, in the context of her experience with mana whenua views, any future development proposal for the subject site will recognise the importance mana whenua place on watercourses and will require a setback of 30m from the Wai Hora Stream. This area will be a riparian

margin or vested with Council as an esplanade reserve, the details of which would be resolved at subdivision consent stage with further input and consultation from iwi sought at that time.

It is noted consultation is ongoing, and any feedback from iwi, including any changes to the proposal where necessary, will be submitted prior to the hearing for consideration. The Indicative Scheme Plan shown at **Figure 1 & Appendix 1** has included a 30m setback to indicate the initial feedback we have received.

In addition to the above, it is noted that the following sites and areas of significance to Māori (**'SASM'**) identified in the PWDP are relevant to the Subject Site:

- SASM 013 (Waimakariri ki Rakahuri), a Ngā Tūranga Tūpuna – Cultural Landscape which applies to the wider area. The PWDP identifies this as a: *“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”*; and
- SASM 025 (Rakahuri (incl. tributaries), encompassing a tributary to Rakahuri / Ashley River adjoining the site’s southern boundary. The PWDP identifies this as a *“River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species”*.

In addition, the New Zealand Heritage List/Rārangi Kōrero does not identify any cultural heritage items on the Subject Site or adjoining land. The nearest entry is Te Kohanga o Kaikai-a-Waro (ID 9506), encompassing a pa site, and various other features located approximately 700 – 800m from the Subject Site.

8. Reverse sensitivity

Woodend Bypass

It is noted that the Woodend Bypass is proposed to be aligned to the south of the Subject Site, as reflected in the alignment of Designation NZTA-3, proposed to be rolled over into the PWDP. The separation distance between the designation corridor and the Subject Site ranges from 53m – 136m. Whilst vehicle noise from the bypass may be heard by future occupants on the subject site, the designation is similarly proximate to new growth areas northeast of Woodend, and any reverse sensitivity effects from new development on the Subject Site will not be dissimilar to those generated by future residential development in Woodend, which is reflected in the PWDP zoning. The 30m wide esplanade reserve extending from Wai Hora Stream will provide a further separation between future dwellings and the bypass.

Rural activities

The existing rural context is that of rural-residential living and paddocks used for grazing, located to the south and east of the Subject Site. No horticulture, intensive farming or quarrying/mining operations are located nearby. Large lot residential is considered compatible with the nature of existing rural uses in the surrounding area. A stream provides a natural transition between the Subject Site’s southern boundary and RLZ land to the southwest, and the land immediately to the northwest is owned by the submitter and will have a RLZ zoning. As such no reverse sensitivity effects on rural industries/operations are anticipated.

9. Planning and policy context

National Policy Statement on Urban Development 2020 (updated May 2022) (NPS-UD)

The proposal is considered to be consistent with the NPS-UD for the following reasons:

- The proposed rezoning supports the overarching objective of the NPS-UD of achieving well-functioning urban environments by contributing to the supply and variety of homes, in a location accessible to existing amenities in Pegasus, Woodend and Ravenswood, including a supermarket and shopping centre, schools, community facilities and parks/open spaces. The Subject Site is also very close to a planned employment area at Ravenswood (zoned General Light Industrial) which is

accessible by walking and cycling given its proximity (approx. 1.5km away), and is close to established employment areas in Southdown and Rangiora, although it is acknowledged that these are accessible by private vehicle only (but noting that Policy 1(c) does not anticipate all employment areas are accessible by public or active transport) (Objective 1, Policy 1);

- The proposal supports reductions in greenhouse gas emissions by providing for additional housing in an area very close to existing and planned services, amenities and jobs at Ravenswood, accessible by walking and cycling, or by a short vehicle trip that will produce fewer greenhouse gas emissions than trips originating from more remote locations for residential growth (Policy 1(e));
- The Subject Site and proposed residential activity is resilient to the effects of climate change, particularly as it is not proximate to the coast, and is not subject to any significant flooding risks (Policy 1(f));
- By enabling additional housing supply, the rezoning will contribute to improving housing affordability and a competitive residential market (Objective 2), particularly with existing servicing infrastructure already in place to the site;
- The proposal will also enable more people to live in an urban environment where there is high demand for housing and a long-term projected shortfall in dwellings, as discussed later in this report, and near land in Ravenswood zoned for centres and employment activity (Objective 3);
- The planned urban form of 12 large lot residential lots on the Subject Site is consistent with the built form anticipated within the SPZ(PR) which is proposed to be applied to the site (Policy 6(a));
- The proposal will not result in significant changes to the amenity of the area. The rezoning is likely to improve amenity values for occupants, communities and future generations by increasing housing supply in the Pegasus Resort neighbourhood, whilst not detracting from existing rural amenity values to the northwest and southwest (Policy 6(b)); and
- Whilst the land is not identified for growth in the Waimakariri 2048 District Development Strategy, the NPS-UD directs decision-makers to be responsive to development capacity that contributes to well-functioning urban environments, even where unanticipated by RMA planning documents (Policy 8).

National Policy Statement on Freshwater 2020 (NPS-FM)

The Subject Site does not contain any rivers, wetlands or other freshwater bodies. Whilst the southwest boundary of the site adjoins a tributary to Rakahuri / Ashley River (Wai Hora Stream), the PWDP sets out provisions to manage effects arising from earthworks, development and subdivision on waterbodies. These include a 20m setback for earthworks from rivers and streams, sediment control requirements to prevent sediment from entering waterbodies, maximum slope standards for earthworks, and requirements to provide esplanade reserves. The Canterbury Land and Water Regional Plan sets out further provisions controlling earthworks and vegetation removal in riparian areas.

It is considered that the development enabled by this rezoning can be undertaken in a manner that prioritises the health and well-being of the adjacent stream, in particular because the indicative subdivision and development, as shown at **Figure 1 & Appendix 1**, can be well set-back to provide an appropriate buffer and esplanade reserve to the stream (proposed 30m riparian), and that potential adverse effects of earthworks and development can be appropriately managed under the provisions of the PWDP and CLWRP.

National Policy Statement on Highly Productive Land (NPS-HPL)

The NPS-HPL has the overarching objective of highly productive land being protected for use in land-based primary production, both now and for future generations. An assessment against the relevant

provisions of the NPS-HPL will be submitted alongside the land use capability assessment for the Subject Land in January 2024.

Canterbury Regional Policy Statement 2013 CRPS)

The proposal is considered to be consistent with the CRPS because:

- With respect to Chapter 5 – Land-Use and Infrastructure, the proposed rezoning enables development that supports consolidated, well designed and sustainable growth around the existing urban areas of Pegasus and Ravenwood, close to existing and planned amenities (Objective 5.2.1.1). The proposal also promotes the maintenance of the natural environment by not requiring the modification of significant landforms or waterbodies, provides housing choice to meet the region’s housing needs, and is compatible with regionally significant infrastructure (including the Woodend SH1 bypass) (Objective 5.2.2.2).
- The proposed rezoning also supports a safe, efficient and effective transport system. It supports a consolidated and sustainable urban form, given its location adjacent to the Pegasus/Mapleham subdivisions, and close to existing and planned¹ amenities and services at the Ravenswood town centre, which are approximately 1.5km from the Subject Site and therefore can be accessed by walking and cycling (Objective 5.2.3.2). The proximity to existing and planned services will also mitigate adverse effects of transport use by promoting walking and cycling, and shorter private vehicle trips to reduce congestion on the network. The proposed zoning provides an acceptable level of accessibility, and does not adversely affect the accessibility of the surrounding transport network, particularly given the small scale and low-intensity of development that could be achieved under the proposed provisions (Objective 5.2.3.3);
- With respect to Chapter 6 - Recovery and Rebuilding of Greater Christchurch, whilst the proposed rezoning is not within an existing urban area or greenfield priority area (as per Map A to the CRPS), as outlined above, it will nonetheless provide for consolidated and sustainable growth and housing capacity around existing urban areas (noting its proximity to the Ravenswood town centre), in a manner that mitigates effects on the transport network, and in a location that minimises effects on outstanding natural features and landscapes, biodiversity, waterbodies and existing and planned infrastructure. Consequently, the rezoning gives effect to the broader growth objectives set out in Chapters 6 and 7 of the CRPS (as outlined above and below). (Objective 6.2.1.3). The rezoning will not impact any outstanding natural features or landscapes (Objective 6.2.1.4) or indigenous biodiversity (Objective 6.2.1.5) and will maintain water quality by achieving generous setbacks the adjacent stream (Objective 6.2.1.6). The proposed rezoning will protect people from unacceptable risks from natural hazards, given the low risk of flooding hazards across the site, and that any potentially geotechnical risks can be addressed at resource stage, as set out in the attached geotechnical appraisal report at **Appendix 3** (Objective 6.2.1.7);
- With respect to Policy 6.3.3 (development in accordance with outline development plans ('**ODP**')), the proposed rezoning is compatible with the ODP prepared for the SPZ-PR². The proposed scale, form and pattern of development is consistent with residential lots in the ODP and Activity Area 7, which also include low-density residential lots extending from Pegasus Boulevard and connecting roads. The proposed rezoning does not create conflicts with any zoning, features or corridors shown in the ODP.
- With respect to Chapter 11 – Natural Hazards, the proposed rezoning is unlikely to increase the risk of natural hazards to people, property and infrastructure, and there are measures available to manage such risks (Objective 11.2.1 and 11.2.2). The Subject Site is not within a high hazard area, given the flooding depths in a 500-year event are less than 300mm, and the land is not subject to

¹ Under the Town Centre and General Industrial zones within the PWDP

² referenced as SPZ(PR)-APP1

coastal erosion or sea water inundation (Policy 11.3.1). Future development on the small extent of land modelled as being subject to flooding/inundation can be set at an appropriate floor level above the flood plain (Policy 11.3.2). With respect to risks from liquefaction, these will be addressed when the geotechnical assessment is available (Policy 11.3.3).

Waimakariri 2048 District Development Strategy ('WDDS')

The WDDS at pages 42 – 43 sets out the specific development strategy for Woodend/Pegasus, which anticipates residential growth through the expansion of Woodend to the north, west and southeast, in addition to urban intensification. Commercial growth is proposed through existing business zoned areas. The Short Eastern Bypass of Woodend is also identified in the development strategy.

Whilst the Subject Site is not shown within the infrastructure supported boundary, the attached servicing memorandum at **Appendix 2** demonstrates that future residential lots can be serviced by vehicle access, reticulated water and wastewater infrastructure, and on-site stormwater infrastructure, such that no adverse servicing effects are anticipated. It is also noted that the proposed rezoning represents a very small expansion to the Pegasus township which was anticipated by the developers of the original Pegasus subdivision (see **Appendix 2**).

Our Space 2018-2048, Greater Christchurch Settlement Pattern Update ('OS 2048')

With respect to Waimakariri, the OS 2048 anticipates 13,360 new households within the Waimakariri District by 2048, representing 15% of the overall growth in housing capacity in the Greater Christchurch area. A high-level strategy for future growth and development areas is set out at Figure 16, which identifies:

- Woodend/Pegasus being a 'Key Activity Area';
- Woodend North (Ravenswood area) being a Greenfield Priority Area – Residential; and
- Land for urban expansion at Woodend South, within a Projected Infrastructure Boundary.

Whilst the Subject Land is not identified as being within an area for expansion/growth, the proposed rezoning gives effect to the broader considerations of the OS 2048 as:

- The scale of the Subject Site and proposed development is small, enabling only 12 dwellings on a 3.81ha site;
- The development of the Subject Site was anticipated by the original Pegasus subdivision developers, and there is existing transport, water, wastewater and utility infrastructure available to service the site. In particular, the reticulated public water and wastewater networks serving the Pegasus area have been designed with sufficient capacity to serve the proposed 12 lots on the Subject Site;
- The site is integrated with the transport network. The Subject Site is located close to SH1, and is a 15 minute walk from a bus stop at the corner of Pegasus Boulevard and SH1, which is served by the 95 bus route to Christchurch via Kaiapo;
- As set out in the below section, the rezoning provides for additional housing supply in an area anticipated to experience shortfalls in housing the medium and long-term. Furthermore, the additional housing will support the Pegasus Resort tourist destination hub, adding to the vitality of this unique golf resort focused neighbourhood;
- With respect to the effects of climate change, the site is well-separated from the coast and not subject to coastal inundation or erosion. Whilst flooding risks are identified over part of the Subject Site, these risks have been assessed as low given the modest scale and depth of flooding during 1 in 200 and 1 in 500 events, which can be mitigated by setting appropriate finished floor levels for future dwellings; and

- The rezoning can occur in a manner that protects the natural environment, rural character and versatile soils for the reasons set out in this memo (subject to more in-depth analysis of land use capability which will be provided in January 2024).

Overall the PWDP process provides the opportunity for more detailed land use planning to be undertaken at a local level to understand the opportunities and constraints of rezoning particular outlying parcels of land to support higher level planning initiatives. We consider that the proposed rezoning does not contradict the broader aspirations of OS 2048.

Waimakariri Residential Capacity and Demand Model – IPI 2023 Report (WRCDM)

Section 4.4 of the WRCDM reports on the demand and supply for housing in Woodend and Pegasus over the short-medium term (2023 – 2033) and long term (2033 – 2053). As shown in **Figure 2** below, the WRCDM identifies shortfalls in feasible dwellings supply within Woodend/Pegasus:

- A shortfall of 280 dwellings is identified over the short-medium term (2023 – 2033); and
- A more significant shortfall of 3,050 dwellings is identified over the long-term (2033 – 2053).

The WRCDM notes that only a small share of the plan-enabled capacity is feasible in the medium-term (14%) and long term (18%). The report identifies that the demand for housing in Woodend and Pegasus would be met in other urban areas of the district (Rangiora and Kaiapo) which are reported to have ample supply.

Woodend-Pegasus Dwelling Situation	2023-2033 Short-Medium	2023-2053 Long
Demand +Margin	2,480	5,840
Feasible Supply	2,200	2,790
Sufficiency	-280	-3,050

Figure 2: Woodend/Pegasus Residential Dwelling Demand (+Margin) and Feasible Supply (Figure 4-5, page 36 of the WRCDM)

Within this context, the proposed rezoning makes a small but important contribution to dwelling supply in an area projected to experience housing shortfalls in the medium and long term.

Waimakariri Rural Residential Strategy 2019 ('WRRS')

The WRRS identifies growth locations to meet demand for rural residential living over a 10 year period. Four new rural residential growth locations are identified based on several locational criteria, being Waimakariri (Swannanoa, Oxford, Ashley/Loburn and Gressons Road (north of Woodend)). The WRRS does not identify the Subject Site or surrounding land as a growth area.

Despite not being identified as a growth location for rural residential development, the proposed rezoning is considered consistent with the WRRS, particularly as it meets the locational requirements for new rural residential areas set out on page 9 of the WRRS, and summarised and responded to below:

• Avoid noise sensitive activities occurring within the 50 dBA Ldn air noise contour surrounding Christchurch International Airport;	The Subject Site is not located within the noise contours surrounding Christchurch International Airport.
• Not compromise the operational capacity of the Rangiora Airfield;	The Subject Site is not proximate to Rangiora Airfield
• Support existing or upgraded community infrastructure and provide good access to emergency services;	The Subject Site has good access to community infrastructure including: <ul style="list-style-type: none"> ○ Rangiora Library; ○ Pegasus Community Centre;

	<ul style="list-style-type: none"> ○ Woodend Community Centre; <p>The Subject Site is easily accessible for emergency services given its location near to SH1</p>
<ul style="list-style-type: none"> • Avoid significant reverse sensitivity effects with adjacent rural activities, including quarrying and agricultural research farms, or strategic infrastructure; 	The Subject Site is not proximate to any rural activities that may result in reverse sensitivity effects on such activities
<ul style="list-style-type: none"> • Avoid significant natural hazard areas; 	The site is not subject to any significant flooding effects, and is well-separated from the coast and therefore not subject to coastal hazards. The geotechnical appraisal report supporting the rezoning finds that any potential geotechnical risks can be resolved at the time of resource consent.
<ul style="list-style-type: none"> • Avoid significant adverse ecological effects, and support the protection and enhancement of ecological values; 	No significant adverse effects are anticipated, as there are no protected vegetation or waterbodies on the site, which is mostly held in paddock, and that future development will be well set back from the stream and riparian margin forming the site's southern boundary.
<ul style="list-style-type: none"> • Support the protection and enhancement of ancestral land, water sites, wāhi tapu and wāhi taonga of Ngāi Tahu; 	Initial consultation from Mahaanui Kurataiao Ltd has recommended that a 30m riparian margin is provided to protect the health of Wai Hora Stream.
<ul style="list-style-type: none"> • Where adjacent to or in close proximity to an existing urban or rural residential area, be able to be integrated into or consolidated with the existing settlement; and 	Future development on the Subject Site will appear as a small extension to the Pegasus subdivision and will integrate well into this existing settlement.
<ul style="list-style-type: none"> • Avoid adverse effects on existing surface water quality 	Future development will be well set back from the stream along the southern boundary of the Subject Site (30m), and the PWDP including provisions relating to subdivision, earthworks, development and vegetation removal to avoid effects on surface water quality.

PWDP Proposed Objectives and Policies

With respect to the SPZ(PR) policy framework, this zone anticipates a unique special character associated with the worldclass Pegasus golf course which is an important regional tourist hub. The golf course is supported by a range of activities, including high quality residential housing which fronts on to the manicured golf course, and contributes to, the particular amenity values and character of this zone.

The particular SPZ(PR)-P9 policy relating to residential development states:

Provide for residential development located within Residential activity area, while ensuring amenity values resulting from views over the golf course are maintained with no intensification of residential activity beyond what is provided for in the Activity Rules and Built Form Standards.

As discussed in Section 6 of this Memo, the character and particular amenity values will be supported by the proposed rezoning. In particular, the large lot residential sites will ensure that views over the golf course remain consistent with the visual outlook afforded by the existing Pegasus Resort residential areas.

The submitter has also given due consideration to the Outline Development Plan - Activity Area 7 and its typology in relation to the golf links and Pegasus roading network. The pattern of development involves a

unique arrangement of allotments which front on to the golf links, typically along a singular road spine. For this reason, the submitter has put forward a relatively small portion (3.81ha) of their wider 16.01ha land parcel for rezoning as SPZ(PR) and retained the bulk of the property (22.09ha) as RLZ to follow this pattern of development.

For the reasons discussed above and in Section 6 of this memo, it is considered that the proposed rezoning will readily give effect to the policy framework of the SPZ(PR). Overall, the zoning request will positively contribute to the special character and open space amenity afforded by the Pegasus Resort area by enabling additional housing to establish alongside the golf links in a manner that is consistent and complementary to the existing pattern of residential development.

10. Conclusion

For the reasons outlined in this memorandum, we consider there are no reasons to preclude the Subject Site at 20 Te Haunui Lane, Pegasus being rezoned in accordance with the submission made by Howard Stone.

List of Appendices

- Appendix 1: Indicative Scheme Plan, prepared by Woods Ltd, dated 06/03/2024
- Appendix 2: Servicing Memo prepared by Woods Ltd, dated 06/03/2024
- Appendix 3: Geotechnical Appraisal Report, prepared by Engineering Design Consultants, dated 14/02/2024
- Appendix 4: Agricultural Land Use Assessment, prepared by Dunham Consulting, dated 24/01/24.

Yours faithfully



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