

**BEFORE THE INDEPENDENT HEARINGS PANEL
APPOINTED BY WAIMAKARIRI DISTRICT COUNCIL**

UNDER the Resource Management Act 1991

IN THE MATTER of Submissions on the Waimakariri District Plan
Review – Hearing Stream 12

STATEMENT OF EVIDENCE OF VICTORIA LOUISE EDMONDS

for Rainer Hack and Ursula Hack (Submission Number 201)

Planning

Dated: 5 March 2024

Align

EXPERIENCE

1. My full name is Victoria Louise Edmonds.
2. I have a Bachelor of Resource and Environmental Planning (hons) from Massey University, and I am an Intermediate member of the New Zealand Planning Institute. I also hold a Postgraduate Certificate in Law from the University of Auckland.
3. I am a Senior Planning Consultant at Align Limited, a multi-disciplinary consultancy offering services in planning, property, urban design and landscape architecture.
4. I have practiced in the planning profession for over 8 years working in local government and non-governmental organisations in New Zealand. I have worked on a broad range of projects involving infrastructure, commercial, rural, residential, and pursuant to a number of national environmental standards. I have experience in both preparing and processing District Resource Consents and preparing Regional Resource Consents.
5. I have also been involved in Plan Change processes for the Whanganui District Plan (including land instability and rezoning of land) and Palmerston North District Plans (including pressure sewer networks and rezoning of rural land). I also have experience as a heritage planner, working closely with heritage interest and community groups.
6. Unless otherwise specified, all statements in this evidence are my own opinion.

CODE OF CONDUCT

7. Although these proceedings are not before the Environment Court, I have read, understood, and will comply with the Code of Conduct for Expert Witnesses contained in the Environment Court's Practice Note 2023. This evidence has been prepared in accordance with this Practice Note and I agree to comply with it. Except where I state that I am relying on the evidence of another person, I confirm that 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 expressed in this evidence.

SCOPE OF EVIDENCE

8. Align has been engaged by Rainer and Ursula Hack (the Submitters) to provide planning evidence in respect of their submission (# 201) on the Waimakariri District Plan Review.
9. This statement of evidence provides additional context and argument to support the original submission made by the Submitters.
10. The submission is in favor of the Council's plan change in principle and requests including the property at 110 Parsonage Road in the list of sites to be rezoned for residential use (Medium Density and Large Lot Residential). This rezoning would promote a more efficient and beneficial use of a small and isolated parcel of land where any adverse effects can be suitably managed.

11. My evidence will address the following:

- Benefits of extending the Woodend urban footprint in this location
- Suitability of the land for built development
- Infrastructure effects (drawing on the evidence of Mr James Hopkins which will be presented separately)
- Effects on Waka Kotahi designation
- Effects on neighbours
- Heritage effects

12. In preparing this statement of evidence, I have:

- Read the s42A report and attachments referred to therein.
- Reviewed the relevant statutory framework, plans, policies, and related materials that are referred to in the above.
- Reviewed the further Waimakariri Residential Capacity and Demand Model Economic Assessment December 2023.
- Read the conditions of the Notice of Requirement for the Woodend Bypass
- Read the submissions received by the Council.
- Read the rezoning memo issued by the Hearings Panel on the 12 December 2023.
- Read, refer to and rely on the evidence from the following persons:
 - Engineering - James Hopkins
 - Geotechnical – Raymond Su

13. I have attached the following documents to my evidence:

- Appendix A - Indicative site masterplan prepared by Align's landscape and urban design specialists.
- Appendix B – Outline Development Plan for the site.
- Appendix C – Geotechnical Desktop Report – Wiley Geotechnical Limited
- Appendix D – NZTA-03 designation conditions document

OVERVIEW OF SUBMISSION

14. The submitters are the landowners of 110 Parsonage Road, Woodend.

15. The original submission points relevant to this evidence are summarized as follows.

- Rezone 110 Parsonage Road to Large Lot Residential Zone. OR
- Rezone 110 Parsonage Road a mix of General Residential and Large Lot Residential. OR
- Rezone 110 Parsonage Road, 90 Parsonage Road and part of 20 Thirlwall Street to General Residential, or a mix of General Residential, Medium Density Residential

and/or Large Lot Residential and amend to include within the Urban Growth Boundary as the Waimakariri District Development Strategy identifies this area for residential development. OR

- Rezone most of 110 Parsonage Road to General Residential Zone with Large Lot Residential for the area around the historic homestead and along the State Highway designation. OR
- Include 110 Parsonage Road in any future East Woodend Development Area. OR
- Amend Urban Growth Boundary to include land up to the State Highway designation and rezone to General Residential, or put in place a Residential Development Framework as this land is no longer suitable for primary production and given its close proximity to Woodend it has adequate services and infrastructure.

16. It is accepted that there are a range of options proposed for zoning. This evidence will focus on the overarching theme of rezoning the property for residential purposes, justification of why a form of residential zoning is the best option for the site and propose a specific zoning layout. To support this, the East Woodend Development Area, and Outline Development Plans (proposed District Plan) are discussed as part of the policy context to support rezoning.

OTHER SUBMISSIONS REGARDING 110 PARSONAGE ROAD

17. Below is a summary of submissions that Council's summary of submissions has indicated are relevant to 110 Parsonage Road.

Submission Number 77.1 - East West Developments Limited - Grant Johnston

18. This submission opposes the rural zoning of all land that is adjacent to (adjacent to Parsonage and Eders Roads, and all large lot residential in Woodend. Instead, the suggestion is to rezone it as a Medium Density Residential Zone. The reasoning behind this is that the land, located near Parsonage and Eders Roads, is viewed as an extension to the existing township. It is considered suitable for construction, easily commutable to Christchurch and nearby towns via the motorway and has access to nearby services that can be utilized and expanded upon.

Submission Number 250.3 – Fiona Aston

19. This submission seeks amendments to the approach for Large Lot Residential Zone development and urban development in order to achieve sustainable growth and development of the District, meet the requirements of the National Policy Statement on Urban Development 2020, and achieve the purpose of the Resource Management Act 1991.

Submission Number 348.2 – Morris Edward Harris

20. This submission opposes the 20ha minimum subdivision standards and recommends an increase in 0.5-1ha lifestyle blocks close to towns to enable people to enjoy manageable lifestyle sections and reduce issues of extracting water from wells and discharging wastewater back into the ground.

Submission 178.39 Heritage New Zealand – Pouhere Taonga

21. It is also relevant to note that Heritage New Zealand made a submission relevant to this property (Submission Number 178.39) regarding the Councils proposal to remove the Mairangi Homestead and Stables from the District Plan.
22. In their submission, HNZ advocates for the inclusion of Mairangi Homestead and Stables, emphasizing the broader importance of incorporating all Listed Historic Places from the New Zealand Heritage List Rārangi Kōrero. They note that although the property is currently scheduled in the Operative District Plan, it lacks inclusion in the proposed District Plan under section HH-SCHED2.
23. The relief sought through the submission urges the council to amend HH-SCHED2 to formally add Mairangi Homestead and Stables, Woodend, recognizing its significance as a Category 2 Historic Place.

SITE DESCRIPTION

24. The Submitters own the site at 110 Parsonage Road, Woodend, comprised in Certificate of Title CB453/268. The total area of the site is 3.6 hectares.
25. In the Operative District Plan, the site falls under the Rural Zone, while in the proposed Plan, it is part of the Rural Lifestyle Zone. The existing site use or activity could be fairly described as rural residential or rural lifestyle, being a single dwelling on a 3.6ha site.
26. The site contains 4 notable trees, as listed in the District Plan. All the trees are classified under Policy 10.1.1 for both historical significance, and group and setting significance. These trees are recorded as follows:
- P001 – Ghost Gum
 - P002 – Weeping Elm (*Ulmus Glabra Pendula*)
 - P004 – Cabbage Tree (*Cordyline Australis*)
 - P005 – Copper Beech (*Fagus Sylvatica Purpurea*)
27. It is of note that the notable trees as shown on the Operative District Plan Maps are not situated in the exact locations shown, and instead are indicative of where they are on the site (see figure 2).
28. Only three trees on the site are listed as notable trees in the proposed District Plan. These are as follows:

- TREE001 - Ghost Gum
- TREE002 - Weeping Elm (*Ulmus Glabra Pendula*)
- TREE003 - Copper Beech (*Fagus Sylvatica Purpurea*)

29. The Cabbage tree (formally P004) is not proposed to be protected. The location of these trees shown on the District Plan Map are shown in the correct location (see figure 3)
30. The site is home to a heritage building, which holds dual recognition as a Category 2 listing under Heritage NZ (List number 3076) and as a listed structure under the Operative District Plan (List number H084). This building is known as the Mairangi Homestead and Stables, and its historical significance is duly acknowledged and protected by these designations. The extent of the heritage protection encompasses the entire lot in relation to both Heritage New Zealand and the District Plan listings.
31. The dwelling was constructed in circa 1875-1876 as the parsonage for St Barnabas, the first Anglican church in Woodend, designed by leading Canterbury architect Benjamin Mountfort.
32. The Mairangi Homestead and Stables is not listed in the Heritage Schedule to the Proposed District Plan, and HNZ have submitted on this point (Submission number 178.39). This submission is briefly discussed above in the 'Overview of submission' section.
33. The site is in close proximity to the established urban area of Woodend, which is extending eastward via consented development, as shown in Figure 1 below.



Figure 1 - Proximity of Subject Site to Established Urban Area

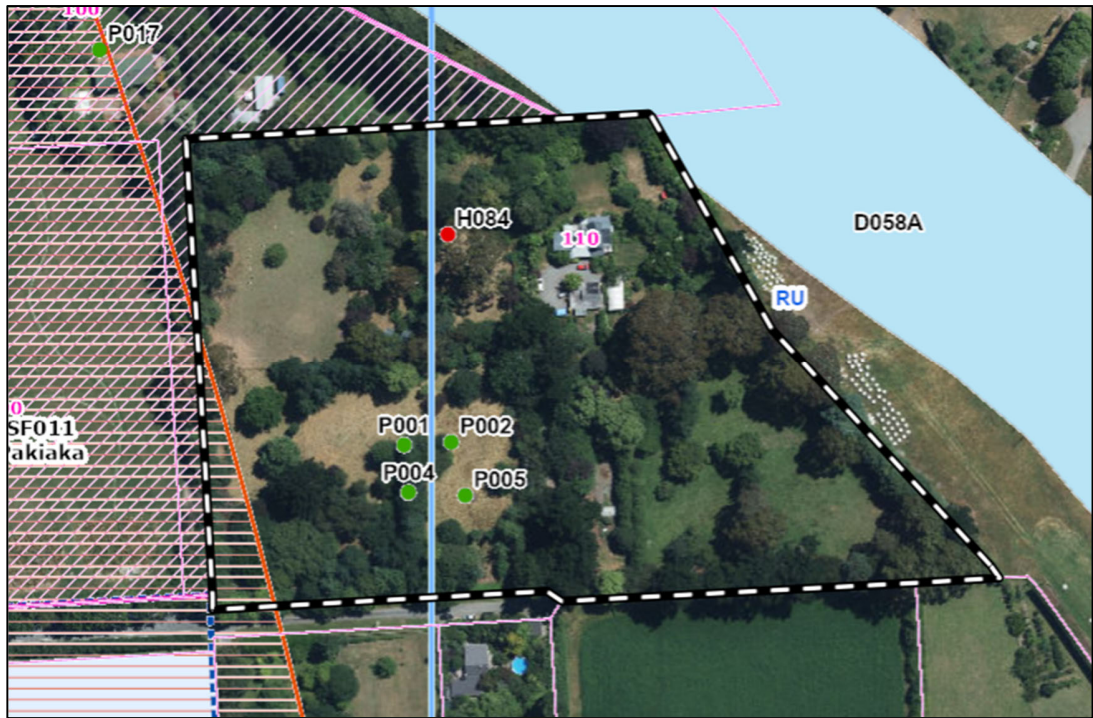


Figure 2 - Operative District Plan Overlays

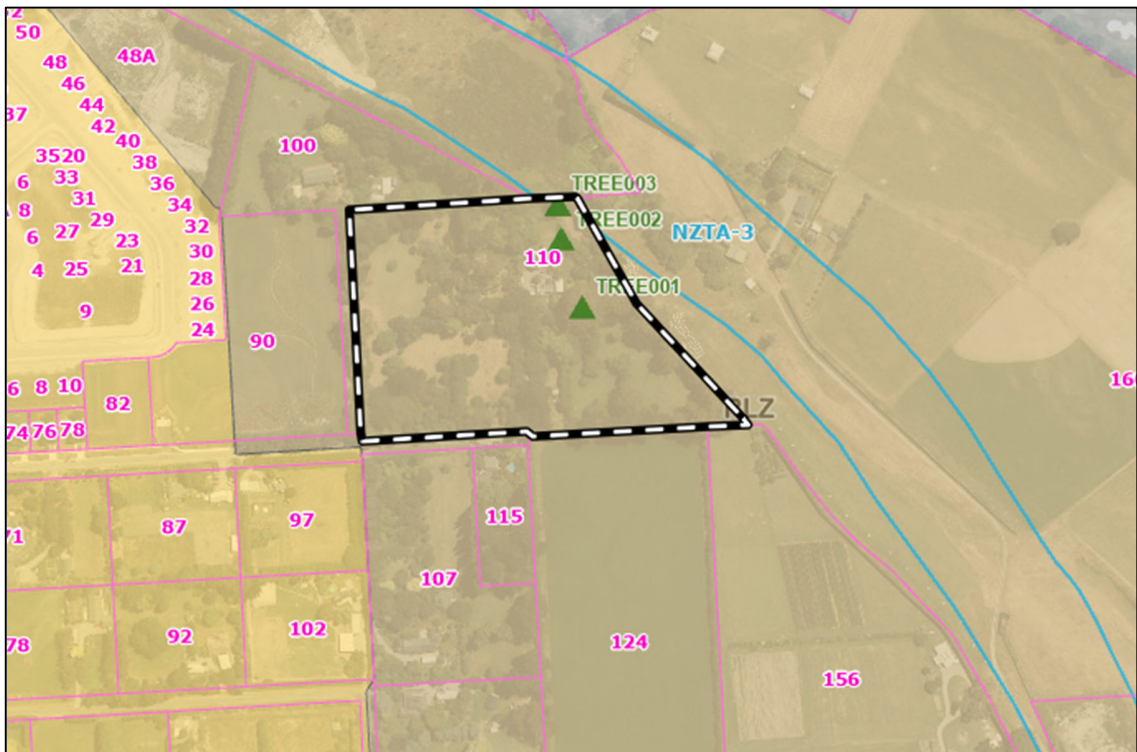


Figure 3 - Proposed District Plan Overlays



Figure 4 – Selection of trees (110 Parsonage Road)



Figure 5 - Driveway (110 Parsonage Road)



Figure 6 - Neighbouring Stormwater Reserve to the west of subject site



Figure 7 - Mairangi Homestead

DEVELOPMENT ASPIRATIONS

34. The owners aim to achieve a balanced development on the site, incorporating generally low residential density while respecting its rich heritage and character. Their vision prioritizes the preservation of historical significance, ensuring integration of modern living spaces. They also want to protect the unique character and heritage values of the property, creating a buffer around the heritage dwelling, while ensuring the rest of the site can be used in a more efficient manner than what currently can be developed on the site.
35. The site holds significant potential for a residential-style subdivision that can be thoughtfully designed to blend with the unique characteristics of the site itself. Furthermore, it can be designed to integrate with the variety of land uses already present in the immediate vicinity of Parsonage Road.
36. A preliminary design has been created to demonstrate the suitability of the site for residential-style development. The concept plan (shown in Figure 6 below) demonstrates how the site could be developed into around 31 residential lots, with a mix of medium density style, and larger lots for residential dwellings. The design takes into account the heritage that is present on the site (including the current dwelling and a mix of notable trees listed in the District Plan) and retains a range of established vegetation located throughout the site.

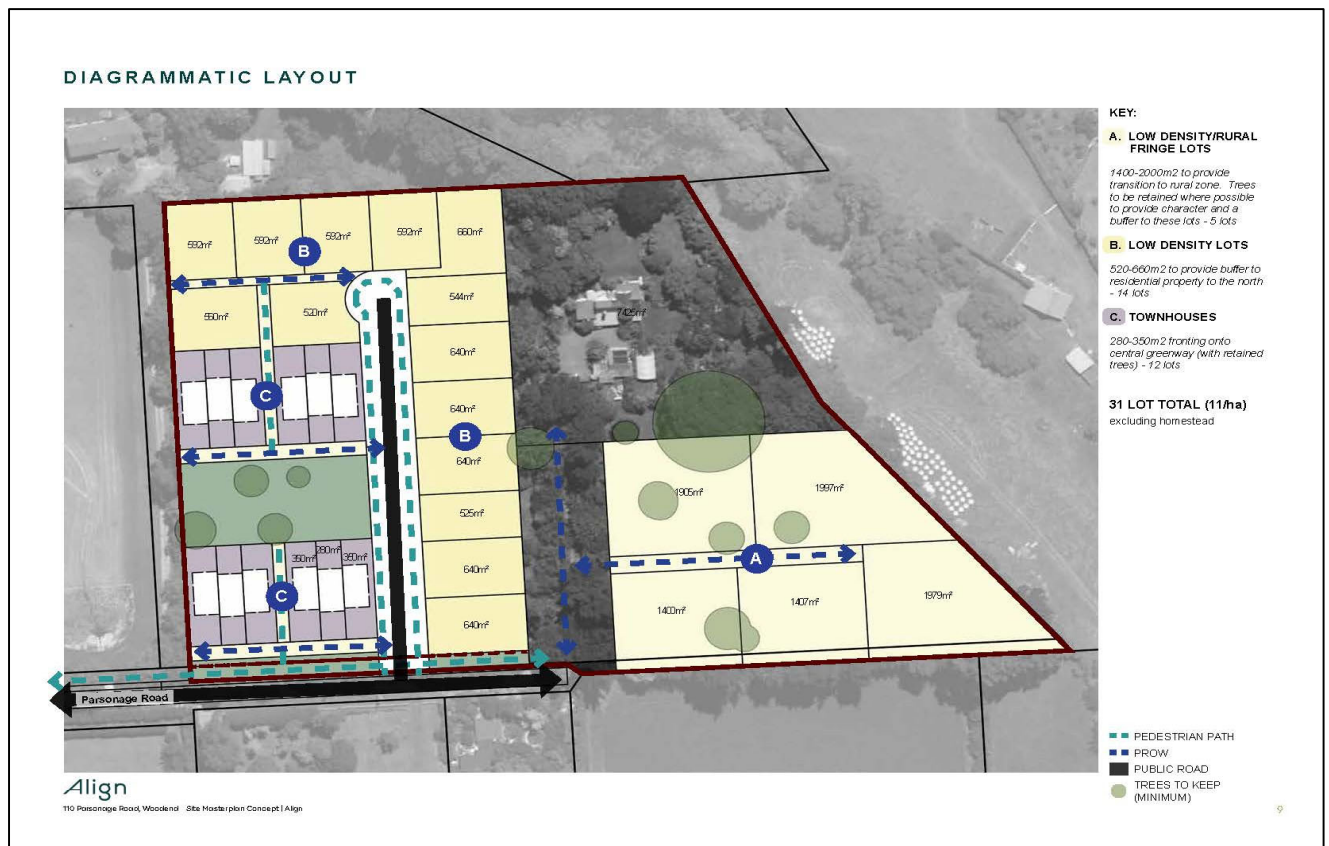


Figure 8 - Figure 6 - 110 Parsonage Road (Preliminary Concept Plan) – also shown at Appendix A

PRE-APPLICATION MEETING WITH COUNCIL

37. A pre-application meeting between the Waimakariri District Council resource consents and development engineering / assets teams, the Submitter's representative and architect Stefan Hack and Align (planning and urban design staff) was held on August 10th, 2023. This focused on the draft concept masterplan for the site, as a possible non-complying activity resource consent application under the current zoning.
38. The following is a summary of the meeting;
- Architect Stefan Hack shared his family's deep connection to the land at 38 Kent Ave, Waitarere Beach, dating back to the late 1980s. The vision emphasized responsible subdivision, preserving a historic homestead and its 1870s garden.
 - Align presented a concept masterplan (Appendix A) considering unique site features like a pond, NZTA designation, and protected trees. The proposed masterplan aimed at maintaining a semi-rural landscape while introducing housing diversity.
 - The masterplan reflected a balance between development goals and preservation, emphasizing low-density lot houses, traditional family homes, and a central greenway.
 - Questions arose regarding the appropriate density and form, prompting discussions on the council's stance. Council's planner outlined District Plan requirements, leading to considerations of Resource Consent versus a plan change.
 - The Hack family had submitted on the Proposed District Plan requesting a zoning change (the current process in which this evidence supports). Discussions explored expediting the process for a non-complying activity subdivision. There was also discussion of the possibility of a private plan change option for the site. The Council planning team noted that once the Proposed District Plan is operative a private plan change cannot be processed within 2 years, unless it is adopted by the Council itself.
 - Key points included the need for further consultation, exploration of different processes, and considerations for restrictions on future subdivisions, highlighting the complexity of balancing development aspirations with the regulatory framework.
 - Discussions covered critical aspects, including zoning and heritage building preservation, land use and building plans, accessways and emergency services, waste management, stormwater management, building code and flood hazards, and water and sewer infrastructure.
 - The proposed development faces complexity due to the need for careful coordination and consideration in several key areas. These include zoning and heritage preservation, land use and building plans, accessways and emergency

services, waste and stormwater management, building code compliance, flood hazards, and water/sewer infrastructure.

BACKGROUND

WAIMAKARIRI DISTRICT PLAN REVIEW

39. The submission by our client sought amendments to the proposed District Plan, in order to enable residential development of the site. Please refer to the Overview of Submission section for more information.
40. The subject site is located within the Rural Zone of the Waimakariri Operative District Plan that only allows for minimum lot areas of 4ha under Rule 32.1.

PROPOSED DISTRICT PLAN

41. The Proposed District Plan zoning (as publicly notified) for the property is Rural Lifestyle with the same density limitation as the operative plan of 4ha lot sizes per residential unit and subdivision (see below). Again, subdivision into smaller lots than this would be a non-complying activity under the current drafting.
42. The strategic direction of future development is managed through the Proposed District plan's objectives and policies. The specific objectives and policies within the Urban Form and Development Urban Framework (UFD that are applicable to the subject site are as follows:
 - UFD-P1 - Density of residential development
 - UFD-P2 - Identification/location of new Residential Development Areas
 - UFD-P3 - Identification/location and extension of Large Lot Residential Zone areas
43. The subject site has not been identified as an area where further intensification can take place and this will limit any possible further intensification of the subject site.

CONSULTATION AND ENGAGEMENT

44. As part of preparation for preparing this evidence, Align has engaged with the following Iwi entities and key stakeholders:
 - Te Ngāi Tūāhuriri Rūnanga
 - Heritage New Zealand
 - Waka Kotahi

Te Ngāi Tūāhuriri Rūnanga response:

45. On August 13th, 2023, we initiated contact with Te Ngāi Tūāhuriri Rūnanga concerning the preliminary concept subdivision plan. Subsequent discussions led to their involvement in preparing cultural advice regarding this plan. On October 9th, 2023, Te Ngāi Tūāhuriri Rūnanga responded with a comprehensive cultural advice report.
46. The entire Canterbury region holds cultural landscape value, representing the historical connection of Ngāi Tahu to the land. These cultural landscapes are areas with deep traditional, historical, spiritual, and ecological significance to Ngāi Tahu. They are essential to Ngāi Tahu culture, identity, and history, passing on these valuable connections from one generation to the next.
47. This report highlighted critical insights from the Mahaanui iwi management plan 2013, emphasizing the importance of water and land management that reflects the cultural significance of these resources.
48. Key policies include promoting intergenerational interests in decision-making, protecting water quality, opposing discharges of contaminants to water, considering costs and benefits in water quality, recognising waipuna as cultural treasures, and enhancing water use efficiency in both urban and rural settings.
49. The takiwā, or region, must manage land use and development activities in a way that aligns with the land, considering the vital role of Papatūānuku (Earth) in sustaining people and communities.
50. The report underscores that current water management and governance have not adequately protected freshwater resources, leading to over-allocation and degraded water quality. This has substantial consequences for Ngāi Tahu's relationship with water, mauri, mahinga kai, cultural well-being, and indigenous biodiversity.

Indigenous Biodiversity Conservation:

51. The indigenous biodiversity, encompassing flora and fauna, is of immense importance to Ngāi Tahu, both for its inherent value on the landscape and its role in providing ecosystem services and mahinga kai. This relationship between tāngata whenua and indigenous biodiversity has evolved over centuries and is a fundamental part of Ngāi Tahu culture and identity.

Concerns and Recommendations:

52. The Kaitiaki for Te Ngāi Tūāhuriri Rūnanga have expressed concerns about the impact of residential development on the cultural landscape and the potential loss of indigenous habitat. Therefore, it is recommended that a thorough site survey is conducted to identify and protect indigenous species.

53. In addition, they also indicated that any springs found on the site should be preserved and enhanced. Stormwater from residential development should be treated before discharge into the Waimakariri District Council system.
54. Low-impact design methods, such as rain and greywater collection, minimizing impervious surfaces, and water-saving fixtures, are encouraged for residential development. Furthermore, planting indigenous species is encouraged to boost indigenous habitat, filter sediment, and sequester carbon. Developers are advised to consult the Ngāi Tahu Subdivision and Development Guidelines for endorsed low-impact design methods.
55. The Advice Report also included the Ngai Tahu Subdivision and Development Guidelines, which they encourage any proposed subdivision development to adhere to. The guidelines outline preferred options in terms of the following,
- Cultural Landscape
 - A cultural landscape approach is appropriate.
 - Stormwater
 - All new developments must have on site solutions to stormwater management.
 - Stormwater swales, wetlands and retention basins are appropriate land-based stormwater management options.
 - Appropriate and effective measures identified during construction phase.
 - Earthworks
 - Earthworks are subject to the general policy of earthworks (Section 5.4 issue P11 of the iwi management plan).
 - Area of land cleared and left bare should be kept to a minimum to reduce erosion and minimise stormwater runoff.
 - Water Supply and use
 - New developments should incorporate measures to minimise pressure on existing water resources.
 - Able to prove existing infrastructure has capacity.
 - Waste Treatment and Disposal
 - Implement measures to reduce volume of waste within the development such as grey water recycling.
 - Connection to reticulated sewerage network.
 - Design Guidelines
 - Incorporate low impact urban design and sustainability options.
 - Landscaping and Open Space
 - Sufficient open space in community.
 - Indigenous biodiversity objectives should be incorporated into development plans.
56. After conducting an initial assessment of these guidelines, I am confident that we can successfully incorporate them in any further development of 110 Parsonage Road.

57. Consultation was also undertaken with Waka Kotahi (NZTA) and Heritage New Zealand. Summaries of these discussions are included under the respective headings in the Planning Arguments section.

POLICY SUPPORT FOR THE PROPOSED REZONING

58. This evaluation of the policy intent will primarily focus on the provisions of the Proposed District Plan, as the expected framework for the District, rather than the Operative District Plan.

WAIMAKARIRI DISTRICT COUNCIL PROPOSED DISTRICT PLAN

SUB - Wāwāhia whenua – Subdivision: Criteria for Outline development plans

59. Rezoning the site to residential (medium density and large lot residential) aligns with the requirements of an Outline Development Plan (ODP), specifically addressing the SUB-P6 guidelines for infrastructure. This involves ensuring integrated and comprehensive infrastructure with subdivision. The rezoning proposal commits to upgrading existing infrastructure solely for the subdivision's benefit, and it outlines provisions for cost-sharing or financial contributions proportional to the benefits received.
60. Additionally, the Proposed District Plan addresses the need for adequate infrastructure, encompassing wastewater disposal, water supply, stormwater management, and essential utilities such as phone, internet, broadband, and electricity, which can all be achieved at this site. The commitment to connecting to existing reticulated wastewater systems and installing onsite treatment systems where needed further demonstrates compliance with ODP requirements.

UFD - Āhuatanga auaha ā tāone - Urban Form and Development

61. Under the Proposed District Plan, 110 Parsonage Road would transition to the Rural Lifestyle Zone from its current Rural Zone. This change signifies that lower-density integrated residential-style development is deemed more appropriate for the site than primarily rural-based activities. The zoning change comes with limitations, as the property would still adhere to the current plan's 4ha lot size per residential unit. Subdivision activities would require a resource consent for a restricted discretionary activity if the site contains a historic heritage item or notable tree.
62. The strategic direction for future development is guided by the Proposed District Plan's objectives and policies, especially within the Urban Form and Development Urban Framework (UDF).
63. Policies such as UFD-P1, UFD-P2, and UFD-P3 directly apply to the subject site, emphasizing residential development density and identifying new Residential Development Areas.

64. UFD-P1: Density of Residential Development

Our development will introduce lot sizes and residential units that align with the desired density for the area, sympathetic to the lower-density nature of the surrounding lots. The layout is designed to ensure the development fits well with nearby residential zones, creating a connected and easy-to-navigate community. We're also implementing measures to address any potential risks from natural hazards, prioritizing safety and resilience.

65. UFD-P2: Identification/Location of New Residential Development Areas

By choosing a location that leverages the existing urban infrastructure and is near a future motorway (Designation) and the town centre of Woodend, our development embodies the goals of UFD-P2. It's positioned to enhance urban connectivity and accessibility, making it a natural extension of the town's urban fabric and supporting the region's sustainable growth.

The proposed development at 110 Parsonage Road aligns with the UFD-P2 policy on the identification and location of new Residential Development Areas by ensuring the following:

- It is designed to fit with the urban form outlined in the Future Development Strategy, promoting a well-coordinated development pattern that integrates with the existing urban area.
- The development strategically uses existing and planned transport and utilities infrastructure. Where necessary, it will contribute to infrastructure upgrades or development to ensure full functionality and sustainability.
- Accessibility is a key focus, with the development ensuring easy connections between homes, workplaces, community facilities, natural spaces, and recreational areas, supporting both public and active transport.
- Higher-density housing is planned near key activity centres, schools, public transport routes, and open spaces, aligning residential intensification with areas that can support greater activity and community engagement.
- The project considers the need to maintain high amenity values in surrounding sites and streetscapes even as it aims for residential intensification, ensuring a quality living environment.
- An Overall Development Plan (ODP) informs the development, guiding its layout, infrastructure needs, and environmental considerations for a well-rounded approach. A preliminary ODP is attached in Appendix #.
- Sustainability and reducing greenhouse gas emissions are central to the development's design, with measures in place to promote energy efficiency and alternative transportation modes to lower the community's carbon footprint.

66. UFD-P3: Identification/Location and Extension of Large Lot Residential Zone Areas

Our proposed development of 110 Parsonage Road takes into account the need to blend with the existing zoning patterns, particularly Large Lot Residential Zones. The

development's thoughtful layout ensures it integrates smoothly into the area, respecting the overall development plan and contributing to a cohesive community environment.

67. In summary, 110 Parsonage Road is carefully designed to comply with urban development policies by creating a diverse and integrated residential community. Our approach focuses on leveraging the site's existing infrastructure and strategic location to enhance connectivity, support sustainable growth, and ensure a seamless fit with the local urban landscape. This development not only meets the required standards for residential density and strategic location but also contributes positively to the community's development and the broader urban planning objectives.

68. UFD-P10 Managing reverse sensitivity effects from new development

The proposed development at 110 Parsonage Road is planned to integrate well into the surrounding environment, with a focus on minimizing any adverse impacts on nearby infrastructure and land used for rural production. The development isn't near the Christchurch Airport, so it won't affect airport operations. To ensure harmonious coexistence with neighbouring properties, including those engaged in rural activities, we're implementing measures such as strategic setbacks and screening. These actions are taken to avoid any disruption to these properties, reflecting our commitment to a responsible and thoughtful development approach.

69. Motorway Designation

The proposed development at 110 Parsonage Road includes specific mitigation measures for lots adjacent to the designated future motorway, aiming to integrate effectively into the surrounding environment and minimise any adverse impacts. Recognising the potential for noise and visual impacts from the future motorway, enhanced landscaping, such as the planting of native trees and shrubs, could be introduced as natural barriers. Additionally, acoustic fencing could be erected along the boundary closest to the motorway to significantly reduce noise levels for future residents. These measures, alongside the strategic placement of buildings and outdoor living areas to minimise exposure to the motorway, demonstrate a proactive approach to ensuring a high-quality living environment for all residents, despite the proximity to significant infrastructure.

East Woodend Development Area

70. Adding the property to the East Woodend Development Area is a viable option due to its alignment with the developmental goals outlined for this region. The East Woodend Development Area, situated on the eastern fringe of Woodend township, is earmarked for residential activity (Figure 9 below).

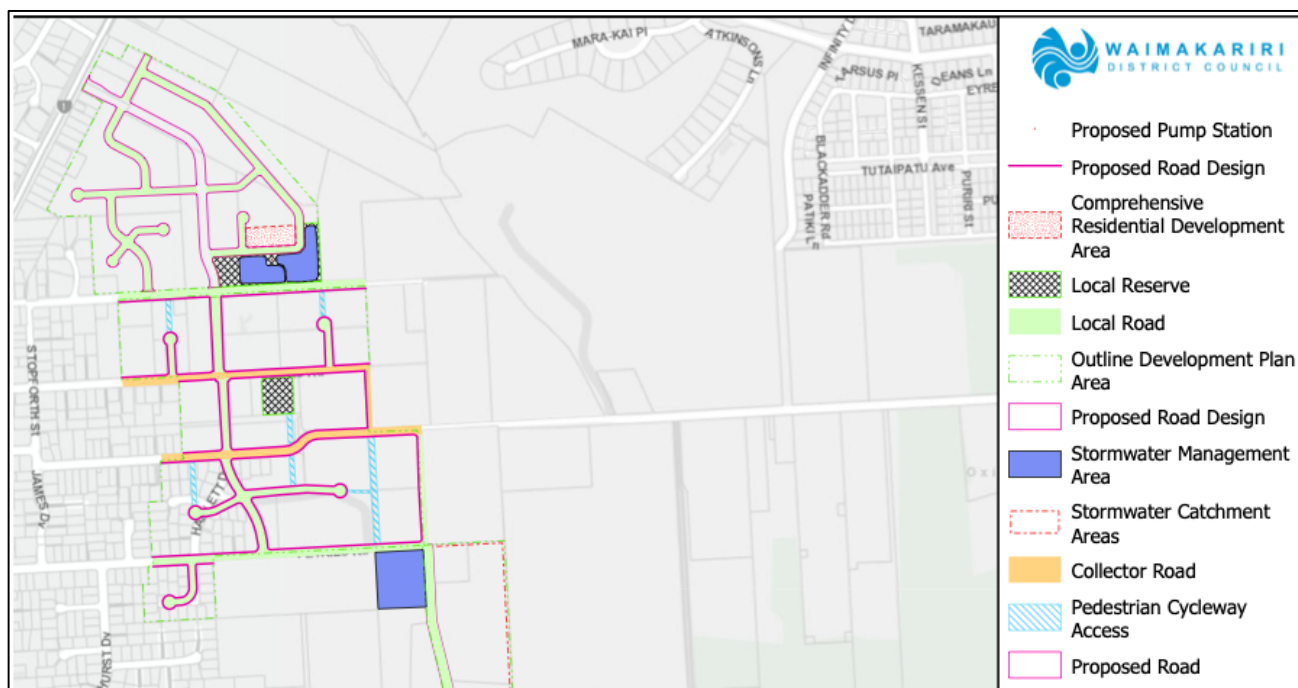


Figure 9 – Proposed East Woodend Development Area ODP

71. The property's location could contribute to the envisioned expansion, with its flat topography and proximity to the McIntosh Drain providing potential for harmonious integration into the planned recreation and ecological corridor. Furthermore, its adjacency to existing road infrastructure, including the planned Woodend Bypass and proximity to State Highway 1, facilitates accessibility and connectivity.
72. A proposed update to the East Woodend ODP is shown in Figure 9 / Appendix B. This demonstrates:
- Proposed lot layout
 - Road connections and hierarchy
 - Pedestrian and cycle connection
 - Stormwater management
 - Infrastructure connections including wastewater and potable water supply
 - Heritage features including notable trees

s32 report – rural zone

73. The section 32 report for the Rural zone, published on September 18, 2021, justifies the proposed rezoning from Rural to Rural Lifestyle. Despite the change, the rules remain consistent to maintain stability. The shift aims to incentivize subdivision for rural living, potentially driving up land values but raising concerns about conflicts between rural and residential land uses.

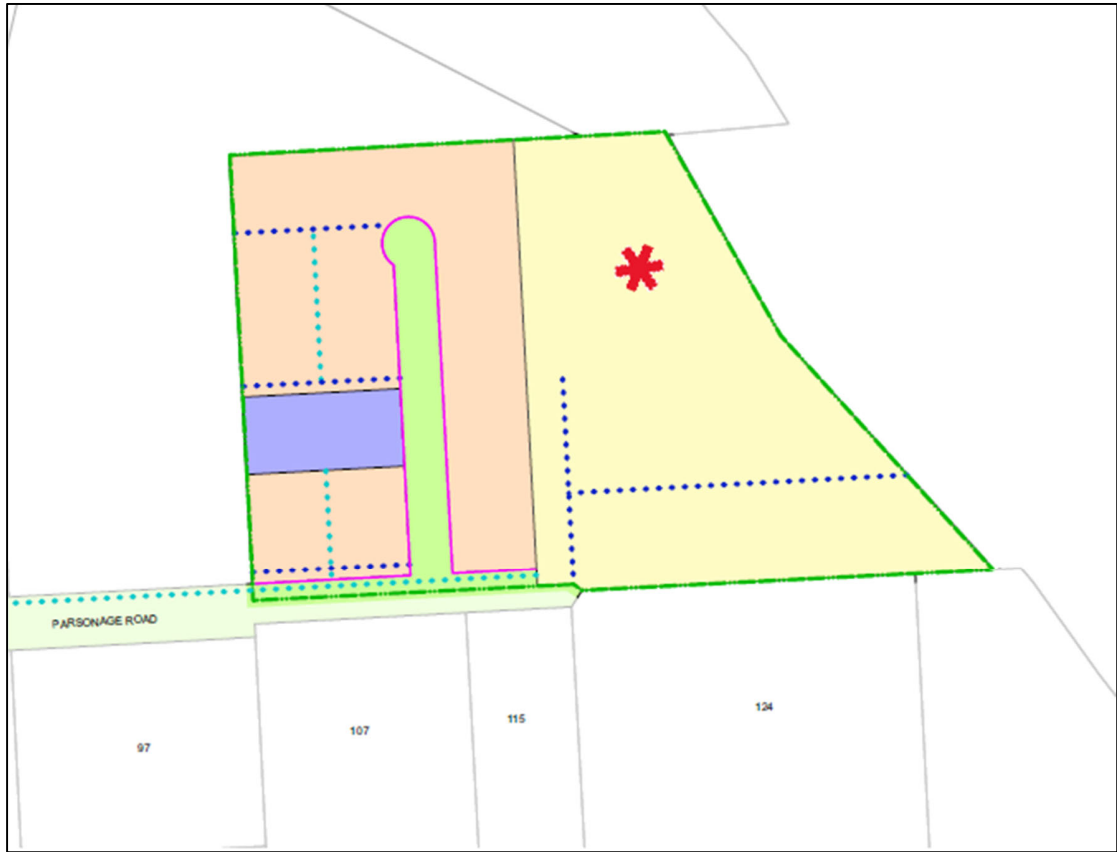
74. The rezoning allows for small-scale subdivision, leading to the development of nodes that might demand new infrastructure and services. This could potentially result in the loss of rural character and a shift towards residential-focused activities. The report acknowledges a policy within the Urban Form and Development Chapter identifying areas suitable for a change in zoning, emphasizing that the residential density remains consistent with the operative plan.

REGIONAL POLICY STATEMENT


Chapter 6 Recovery and Rebuilding of Greater Christchurch

Objective 6.2.2 Urban form and settlement pattern

75. The urban development plan for Greater Christchurch focuses on achieving a balanced and efficient settlement pattern to support recovery and future growth. This involves meeting specific targets for intensification over distinct periods, emphasizing higher density living in key areas, including the Central City, Key Activity Centres, larger neighborhood centers, and designated greenfield, Future Development, and brownfield sites.
76. The aim is to avoid unplanned expansion, promote consolidation, and facilitate the efficient use of infrastructure to create a resilient and well-structured urban environment.
77. The proposed development at 110 Parsonage Road aligns with Greater Christchurch's recovery goals due to its strategic location. Close proximity to existing amenities, reticulated services, stormwater capacity, and access to established local roads makes it an ideal site for efficient and cost-effective urban development.
78. As part of this evidence, a preliminary Outline Development Plan has been prepared for the site. This is attached in Appendix B and shown in Figure 9 below. The ODP in Appendix B also includes a map that demonstrates how the site could be incorporated into the ODP for Woodend.
79. The ODP demonstrates how the site could be split into a mix of Medium Density Residential (west of proposed local road) and Large Lot Residential zoning (west of proposed local road), sympathetic to the overall natural and historic design features of the site.



NOTE:

 MINIMUM LOT SIZE OF 5000M2 AROUND THE EXISTING HERITAGE NEW ZEALAND LISTED BUILDING #3076 AT 110 PARSONAGE RD

KEY:









-  MEDIUM DENSITY RESIDENTIAL ZONE
-  LARGE LOT RESIDENTIAL ZONE
-  OUTLINE DEVELOPMENT PLAN AREA
-  PROPOSED ROAD DESIGN
-  LOCAL ROAD
-  PEDESTRIAN / CYCLEWAY ACCESS
-  INDICATIVE PRIVATE ACCESS
-  STORMWATER MANAGEMENT AREA

Figure 10 - Draft ODP including proposed zoning: 110 Parsonage Road and Key

80. In summary, the outline development plan shows.

- Outline Development Plan Area: The perimeter outlined in dashed green defines the area considered.
- Medium Density Residential Zone: The orange-colored areas on the plan indicate areas suitable for development under the MDRZ policies, rules, and standards.
- Large Lot Residential Zone: The light-yellow areas indicate parts of the development allocated for larger properties (approximately 2,000 to 7,000 m²), which may offer more space between homes and potentially larger garden areas. Large Lot Residential will be adjacent to the future NZTA motorway designation, ensuring there will be less effects on any future dwellings. This zoning also acts as a buffer between the motorway designation and the more intensified residential development on the west of the site,
- Proposed Local Road Design: Solid pink lines illustrate where a new road and upgrade to the existing Parsonage Road are planned.
- Private Right of Way: The dotted dark blue lines represent private driveways or access points that are not for public use but provide access to specific properties.
- Pedestrian / Cycleway Access: Light blue dotted lines indicate pathways specifically designed for pedestrians and cyclists.
- Stormwater Management Area: The large blue area denotes a section reserved for managing stormwater. This will include retention ponds to collect, detain and manage rainwater prior to discharge to McIntosh Drain.

Policy 6.3.3 Development in accordance with Outline Development Plan

81. The Regional Policy Statement emphasizes that development in greenfield priority areas or Future Development Areas, including rural residential development, should occur in accordance with Outline Development Plans. The proposal adheres to this requirement by proposing the incorporation of an amended East Woodend ODP in the district plan.
82. The proposal also directly addresses the concerns specified in Policy 6.3.3.3, presenting the proposed land uses in the priority area. It considers key roading and pedestrian connections, infrastructure services, stormwater treatment, historic heritage, cultural significance, and necessary landscape protection.
83. In line with point 5 of the policy, the proposal identifies and protects significant cultural, natural, or historic heritage features within the development area. This demonstrates a commitment to preserving the area's cultural and environmental richness.

84. We believe that the proposed development and rezoning of 100 Parsonage Road is in compliance with the Regional Policy Statement's Policy 6.3.3. It embraces the outlined requirements, demonstrating a commitment to sustainable and well-coordinated urban development while addressing the needs of the growing community in a strategic and comprehensive manner.

NATIONAL POLICY STATEMENT URBAN DEVELOPMENT 2020

85. The NPS-UD 2020 applies to Waimakariri District Council, which is a tier 1 local authority located in the Christchurch 'Urban Environment', so an assessment of this is appropriate when considering rezoning a rural lot to residential.
86. To rezone a property, it is useful to test the proposed development against the NPS-UD Objectives and Policies.
- Enable community wellbeing (Objective 1);
 - Encourage competitive land and development markets (Objective 2);
 - Enable people to live in an urban environment where there is public transport, employment options, and there is high demand. (Objective 3);
 - Respond to the diverse and changing needs of people now and in the future (Objective 4);
 - Be strategic, integrating with infrastructure provision (Objective 6). 23.
87. In my opinion, the proposal rezoning meets these criteria.
- The proposed urban extension is envisioned to contribute significantly to the sustainable growth and functionality of Woodend as a thriving urban environment.
 - The selected land for the extension meets all the criteria outlined in Objective 3 for additional housing development. Its proximity to the Woodend town center and easy commuting distance to other significant employment centers in the wider area align with the strategic locational criteria. This strategic positioning not only fulfills the immediate housing demand but also contributes to the overall growth and connectivity of the region.
 - From a broader perspective, the proposed rezoning aligns with the National Policy Statement on Urban Development's (NPS-UD) objectives and policies. By providing additional development capacity, the urban extension directly contributes to the NPS-UD's overarching goals. This includes fostering a well-functioning urban environment, accommodating population growth, and enhancing the overall livability of Woodend. The rezoning, in essence, serves as a proactive measure to meet the evolving urban needs while adhering to national planning objectives and policies.

MAHAANUI IWI MANAGEMENT PLAN

88. This Iwi Management Plan provides a statement of Ngāi Tahu objectives, issues and policies for natural resource and environmental management in the takiwā. The plan is the main planning document to assist Papatipu Rūnanga to participate effectively in natural resource and environmental management in the takiwā
89. The proposed development is committed to closely aligning with the Ngāi Tahu Iwi Management Plan, recognising its significance as a guiding document for natural resource and environmental management within the takiwā. Our approach is rooted in fostering a collaborative and respectful relationship with Papatipu Rūnanga, with the aim of ensuring effective participation in the planning and execution of the development.
90. To align with the objectives outlined in the Iwi Management Plan, our development will actively consider and address Ngāi Tahu's objectives, issues, and policies related to natural resource and environmental management. This includes a thorough assessment of the potential impacts on cultural, historical, and natural elements within the takiwā.
91. Furthermore, we are committed to engaging in meaningful consultation and dialogue with the Papatipu Rūnanga throughout the planning and implementation stages. This proactive involvement seeks to incorporate the traditional knowledge, values, and aspirations of Ngāi Tahu into the development process, ensuring that it respects and reflects the cultural significance of the land.
92. In addition to consultation, the development will incorporate tangible measures to preserve and enhance the natural and cultural assets identified in the Iwi Management Plan. This may involve the incorporation of sustainable design principles, preservation of significant landscapes, or the implementation of cultural heritage initiatives.

PLANNING ARGUMENTS

93. The following supports the key issues included in the original submission. The following matters have been addressed:
 - Meeting housing demand
 - Provision of a choice of housing
 - Suitability of the land for built development
 - Geotechnical suitability
 - Hazards – Flood risk and Liquefaction
 - Availability of services
 - Consistent with future intended use of motorway designation
 - Heritage effects

BENEFITS OF EXTENDING THE WOODEND URBAN FOOTPRINT IN THIS LOCATION

Meeting housing demand

94. This property at 110 Parsonage Road is well-suited for residential development, and such a development holds the potential to deliver a range of benefits to the broader community.

Provision of a choice of housing

95. Subdividing a large property can greatly enhance the availability of a wide range of housing choices and types within a single development. By dividing the land into smaller parcels, developers can allocate space for various housing options.

96. Suitability of the land for built development

General

97. The large size of the 110 Parsonage Road property offers an excellent opportunity for smart development planning. It allows us to efficiently design essential features like roads, services, and green spaces.
98. This practical approach not only makes the most of the land but also brings several benefits. We can ensure the development is both functional and visually appealing. Moreover, this approach helps us protect the heritage building on the site. With careful design, we can seamlessly blend it into the development, keeping its historical significance intact.
99. The proximity of the property to a residential zone brings several advantages. It means that essential infrastructure like roads, utilities, and public services is readily accessible and can be efficiently extended as needed. The feasibility of extension of services was tested through a resource consent pre-application discussion with the council's resource consents and engineering teams and there are no insurmountable barriers to it.
100. This not only streamlines the development process but also substantially decreases the costs and complications typically associated with establishing servicing for new housing.

Geotechnical suitability, Flooding and Liquification

101. A geotechnical desktop report has been prepared for the site, undertaken by Wiley Geotechnical Limited (attached in Appendix C). In summary, the report finds that the site is suitable for residential development. The report concludes that;
- *“The geotechnical soil investigation indicates that the general stratigraphy of the ground underlying the site comprises topsoil to approximately 0.3 m, underlain by interbedded clayey silt, silt and sand up to 20 m depth below ground level (bgl), with an intermediate layer of sandy gravel at approximately 9 m to 11 m bgl. Silty and sandy gravel layers are expected below 20 m bgl”.*
 - *“Groundwater is expected below 1 m bgl under static conditions, based on groundwater data obtained in our desktop study, subject to seasonal variation and rainfall events”.*

- *“In terms of NZS 1170, Class D sub-soil conditions (deep or soft soils) are assessed to underlie the site due to the considerable depth to inferred bedrock based on the geology of the area”.*
- *“The site is located within an area where “Liquefaction damage is possible”. The neighbouring subdivision has been assessed to be TC2. Further assessment should be undertaken at the site in the event Subdivision Consent is sought”.*

102. For the next steps, the report recommends

- *“Shallow hand auger boreholes to determine the subsurface material types and strength characteristics”.*
- *“Cone Penetrometer Tests (CPT) to a target depth of 15 m or refusal to determine the soil types and strength characteristics”.*
- *“Liquefaction analysis using the on-site CPT data to determine technical category for the site. The number of geotechnical soil tests undertaken at the site shall be determined based on the proposed subdivision plan and in accordance with MBIE guidance documents”.*

Availability of services

103. There is sufficient capacity in the area in regards to wastewater and potable water supply, and stormwater can adequately be managed on site through the use of storm water detention and retention ponds.

104. 110 Parsonage Road benefits from sufficient capacity in the area for wastewater, potable water supply, and stormwater management. The site can be serviced outside of the Council's reticulated networks, with conditions attached to any subdivision consent requiring connection to upgraded networks when necessary.

105. James Hopkins, Chartered Professional Engineer, has provided comment regarding the site's suitability regarding stormwater discharge. This is as follows:

The roadside drain in Parsonage Road drains to the west where it enters a sump adjacent to the entrance to number 100 Parsonage Road. This sump discharges into an un-named open drain between numbers 97 and 107 Parsonage Road. This drain flows south, connects with Eders Road drainage, then crosses Gladstone Road and enters the circa 2018 open drainage network through Ranby Place and Fearn Drive. The drain then crosses Petries Road, where it becomes known as McIntosh Drain. The McIntosh Drain flows generally southwards for approximately 7 km where it discharges into the Kaiapoi River, near the confluence with the Waimakariri River.

106. James Hopkins has also provided his own evidence regarding the proposal. The evidence is summarised below;

- Stormwater: Current drainage to McIntosh Drain; limited capacity. Drain lacks spare capacity; development must ensure stormwater neutrality. Detailed existing drainage network described.
- Rainfall Analysis: Post-development management includes low-impact designs (swales, raingardens). Aim is to restrict discharge to pre-development levels. Rainwater tanks for dwellings considered.
- Runoff Calculations: Pre-developed runoff coefficient: 0.35; post-developed: 0.535. 48% increase in peak runoff. Rational method and HEC HMS models used; Attenuation Pond proposed.
- Attenuation and Management: Calculations suggest required volume and land area. Proposed development layout exceeds stormwater management needs.
- Flooding and Floor Levels: No significant on-site flooding. Floor level compliance discussed based on flood levels.
- Wastewater: No existing network; proposed gravity network feasible.
- Potable Water and Firefighting: Feasible via reticulated gravity water network.
- Roading and Access: Road upgrades needed for improved access. Anticipated upgrades align with standard engineering designs.

107. Overall, the findings indicate the zoning/ subdivision of the site Road upgrades necessary for improved development access.

Consistent with future intended use of motorway designation (Woodend Bypass)

108. The presence of a Waka Kotahi designation (NZTA-3) in the small north-eastern corner of the property is a key factor to consider. There is no timeframe at present for the development of this designation. It expires in 2030 unless given effect to or extended.

109. The presence of a Waka Kotahi designation in the north-eastern corner of the property complements future transport and infrastructure plans, emphasizing the potential for thoughtful design to improve transport integration and accessibility without proposing direct access to the nearby State Highway 1. Such planning can benefit both residents and the wider community by enhancing connectivity and transport links, aligning with broader goals for sustainable and integrated community development.

110. By carefully considering aspects such as layout, setback distances landscaping, and housing and acoustic design, which is required by Waka Kotahi anyway, the development can coexist in a way that contributes positively to the local area.

111. An Outline Plan must be submitted to the Council 3 months before work starts, as required by section 176A of the RMA. This plan should detail the work's height, shape, and size; the project's proposed layout; the site's expected final contour; vehicular access and parking; planned landscaping; any Waimakariri District Council services assets needing relocation due to the project; and measures to address environmental impacts, including noise barrier designs and considerations from the required Noise Assessment Report.

112. It is important to note that as per the conditions of the Notice of Requirement, in regard to the heritage dwelling and notable trees at 110 Parsonage Road, Waka Kotahi are required to, before giving effect to the designation (Summarised below). The full conditions are attached in Appendix E.

- The Requiring Authority is required to engage a qualified heritage expert for a further assessment of the heritage property at 110 Parsonage Road during the project's detailed design phase and before submitting the CESMP to the Council.
- If the heritage assessment advises steps to lessen negative impacts on the heritage value of 110 Parsonage Road, the Requiring Authority must create a Heritage Management Plan with the property owners, outlining how to apply these steps, to be included in the CESMP.
- The Requiring Authority must hire a heritage expert to photographically document the heritage property at 110 Parsonage Road before and after the project and share this record with the Council and Heritage New Zealand.
- When completing works within 3m of the drip line of the notable tree (Copper Beach *Fagus sylvatica* 'Purpurea' (listed as P#005 in Appendix 29.1 of the District Plan) shall be monitored by an independent, experienced, and suitably qualified arborist. The property owner shall be notified in writing at least 20 days prior to any work commencing that triggers the requirements under this condition.
 - a pre-commencement meeting shall be held so that the tree protection measures for the Notable Trees can be explained by the arborist to all contractors or sub-contractors.
 - A methodology statement for the construction of the acoustic barrier in proximity to the Notable Trees shall be prepared and approved by the arborist prior to works commencing in the vicinity.
 - Roots encountered during excavations in proximity to retained vegetation that require severance shall be cleanly cut back to the excavation face by the arborist using handsaw or secateurs.
 - Exposed roots and root ends of retained trees uncovered during excavations shall be covered by hessian (or a similar product) to prevent them from drying and kept damp until the excavated area can be backfilled.
- A Visual Effects Management Plan must be prepared, that includes consideration of;
 - 110 Parsonage Road (Lot 1 DP 3598) (mitigation may include dense evergreen trees no taller than 6 metres to be planted along the northern

and eastern boundary of the property, for approximately 30 metres each way, starting from the north-eastern corner of the property boundary.

Waka Kotahi response:

113. On August 8th, 2023, we contacted Waka Kotahi and their response, received on October 2nd, 2023, indicated a notable concern related to the potential increase in traffic movements resulting from the proposal. Waka Kotahi has requested the preparation of an Integrated Transport Assessment (ITA) to thoroughly examine and address the possible impacts on State Highway 1 (SH1), particularly in the vicinity of the SH1/Parsonage Road intersection. Additionally, they emphasized the need to consider conditions aimed at mitigating noise and vibration effects stemming from the operation of the Woodend Bypass.
114. To address these concerns, our approach involves incorporating detailed considerations and a more refined design of the subdivision, including access points. This will be part of the broader resource consent process.

Reverse Sensitivity

115. Given the site's proximity to properties designated for rural purposes, addressing reverse sensitivity is crucial. The development plan for the site will include measures such as specific setbacks and thoughtful landscaping to ensure residential areas to the south and north are not just sufficiently separated but also well-buffered from these rural zones. These strategies are designed to minimize potential conflicts and foster a harmonious coexistence between the new residential development and its rural neighbours, emphasizing the importance of careful planning and consideration in integrating diverse land uses.
116. Considering the mix of land uses in the vicinity, including adjacent rural properties, we recognise the significance of addressing potential reverse sensitivity concerns. Given the diverse character of the area, we believe that these concerns can be appropriately mitigated through the implementation of consent conditions and appropriate mitigation measures.
117. Given the site's proximity to the residential-rural boundary and the Waka Kotahi designation, the proposed new zoning can be consistent with the mitigation of any reverse sensitivity effects. Careful planning and design would ensure a harmonious coexistence between residential and rural uses, minimizing potential conflicts.
118. In my opinion, there are no known site-specific constraints inhibiting the proposed intensification that cannot be addressed as part of a subdivision consent.

Heritage New Zealand response:

119. On September 12th, 2023, we initiated consultation with Heritage New Zealand / Pouhere Taonga, and their response, received on September 12th, 2023, requested additional information about the proposal, which we provided on September 13th. Heritage New Zealand informed us that they had recently conducted a report upgrade on the property.

120. HNZ sought confirmation regarding the distance between the western side of the heritage building and the nearest new lot boundary. Subsequently, we provided the requested information, and received a response on November 23rd, 2023. The HNZ feedback is summarized below.

- Site Overview and Heritage Significance
 - The property at 110 Parsonage Road in Woodend houses Mairangi, a historically significant dwelling designed by Benjamin Mountfort in the late 1870s. It's a category 2 historic place (#3076) on the NZ Heritage List, spanning 3+ hectares near Woodend.
- Development Impact on Heritage Values
 - HNZPT stresses the need to preserve heritage amidst development. While acknowledging potential impacts of subdivision on Mairangi's heritage, they suggest a thoughtful approach to minimize effects.
- Assessment of Proposed Subdivision Plan
 - The provided layout lacks information for evaluating heritage impact. HNZPT recommends Archaeological and Heritage Impact Assessments for a better understanding.
- Archaeological and Cultural Considerations
 - Emphasizing the site's pre-1900 significance and Māori history, HNZPT urges involvement of a consultant archaeologist and early consultation with local iwi.
- Suggested Approach for Subdivision
 - HNZPT suggests a tailored approach to subdivision, favoring larger lots with open spaces to preserve the site's mature landscape.
- Impact on Heritage Building and Immediate Setting
 - Expressing concern about the proposed lot proximity to Mairangi, HNZPT advises a heritage impact assessment to gauge potential effects and recommend suitable lot locations.
- Importance of Landscaping in Preservation
 - HNZPT highlights the need for a suitable landscaping scheme aligned with appropriate assessments.

Heritage effects

121. The development of the site is carefully designed to protect the heritage-listed house and recognise the importance of the surrounding land, which is entirely within the Heritage New Zealand listing. This ensures that the land around the house, crucial for maintaining the historical integrity of the property and the broader community, is managed with the appropriate respect and mindfulness it requires.

122. Furthermore, during the subdivision process, stringent protocols can be implemented to ensure that any historical or cultural finds are respected and addressed appropriately. This

commitment ensures that if any artifacts or historical remnants are discovered, they will be handled with care and respect, in line with established preservation procedures.

123. Integrating heritage houses into new housing developments brings a mix of old and new styles to the urban landscape, improving the area's look and character. This approach makes these historical houses more visible and accessible to everyone, not just a single resident. Currently, their historical value is often overlooked because they're hidden from the public. By incorporating them into developments, their historical importance can be appreciated by a broader audience. This strategy aims to preserve the houses' historical character while adapting to modern needs, enriching the community's heritage experience.
124. This approach aims to blend modern necessities with the historical essence of the location, ensuring that the proposed changes complement rather than diminish the heritage value.
125. A buffer will also be implemented and maintained to ensure the house is protected and that the heritage values are not impacted on. The extent of the buffer can be agreed with Council and HNZ during a future subdivision consent process.
126. I consider that implementing a well-planned buffer zone is crucial in safeguarding the heritage house on the site from any potential subdivision activities. This protective buffer not only respects the historical and architectural significance of the heritage house but also ensures its isolation from any developments, thereby preserving its unique character and heritage value intact.

CONCLUSION

127. The submitters seek that 110 Parsonage Road be rezoned to Residential (a mix of medium density and large lot residential as indicated in the proposed outline development plan in appendix B) to enable efficient use of the land, provision of housing for the community and support for the long-term future of the heritage dwelling. Appropriate conditions or limitations on this zoning by means of specific policies or overlay controls could be acceptable. These may include:
 - A limitation of the overall density of the site to (in the order of) 32 lots. This includes 31 new lots, and the lot that will include the heritage dwelling.
 - A requirement to consult with Waka Kotahi about suitable mitigation for future motorway development effects.
 - A requirement to provide an acceptable stormwater mitigation design, as is already a requirement by the Council's engineering standards.
 - Requirements in relation to heritage protection and consultation with Heritage New Zealand.
128. In my professional assessment, the proposed zoning change would effectively fulfill the objectives of the Act by empowering both current and future landowners to address their social, economic, and cultural requirements. Furthermore, it holds the potential to make a modest yet meaningful contribution to the available housing stock.

129. To the best of my knowledge, there are no specific considerations under Section 6 of the Act that need to be addressed and accommodated. In conducting this evaluation, I have placed particular emphasis on Section 7(b), which pertains to the efficient utilization of natural and physical resources, and Section 7(c), which relates to the maintenance and enhancement of amenity values.

APPENDICES

Appendix A – Indicative site masterplan

Appendix B – Outline Development Plan for the site.

Appendix C – Geotechnical Desktop Report – Wiley Geotechnical Limited

Appendix D – NZTA-03 designation conditions document.

V E EDMONDS

5 March 2023