

# WAIMAKARIRI DISTRICT PLAN

## PRIVATE PLAN CHANGE 30

### RAVENSWOOD DEVELOPMENTS LIMITED NORTH WOODEND

## DECISION

November 2021

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## Decision of Independent Hearing Commissioners

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**PC 30:** Private Plan Change 30 (PC 30) to the Waimakariri District Plan by Ravenswood Developments Limited (RDL).

**Plan Change 30 is DECLINED**

The reasons are set out below.

<b>Plan modification number:</b>	Private Plan Change RCP030 (PC 30)
<b>Site address:</b>	The subject site is located North of the existing Woodend township, within the broader Ravenswood site. It is generally bound by State Highway 1 to the east, and the existing Woodend township and Rangiora -Woodend Road to the south, and rural land to the north and west. Figure 1 within the section 42A Report of Mr Matt Bonis dated 28 April 2021 identifies the subject site.
<b>Applicant:</b>	Ravenswood Developments Limited (RDL)
<b>PC 30 Lodged:</b>	3 July 2020
<b>CI 23 Further information:</b>	30 July 2020
<b>PC 30 Accepted:</b>	6 October 2020
<b>PC 30 Notified:</b>	7 November 2020
<b>Submissions closed:</b>	4 December 2020
<b>Submissions summary:</b>	6 February 2021
<b>Further submissions:</b>	22 February 2021
<b>Hearing commenced:</b>	Thursday 20 May 2020 to Tuesday 25 May 2021
<b>Hearing panel:</b>	Paul Rogers (Chair) David Mountfort Kenneth Fletcher
<b>Further information:</b>	Between 24 May 2021 and 1 October 2021 we issued a number of Minutes requesting RDL and the S 42A Officers to both answer discrete questions and provide us with further information. All of which were complied with and taken into account in this decision.
<b>Appearances:</b>	<b>For RDL:</b>

	<p>Sarah Eveleigh and Sarah Schulte - Legal Counsel</p> <p>Paul Croft - RDL</p> <p>Cameron Browne – Planner: Plan Change Content and Rationale</p> <p>Ian Munro – Urban Design</p> <p>Fraser Colegrave – Economics</p> <p>David Haines – Planning</p> <p>Andrew Metherell – Transport</p> <p>Tony Milne - Landscape</p> <p><b>For WDC:</b></p> <p>Matt Bonis - Consultant Planner</p> <p>Derek Foy - Economics</p> <p>Shane Binder - Transport</p> <p>Kalley Simpson - Three Waters</p> <p>David Compton-Moen - Design and Landscaping.</p> <p><b>Submitters:</b></p> <p>Shona Powell for the Woodend – Sefton Community Board</p>
<b>Commissioners’ site visit</b>	Thursday 20 May 2021 and 15 September 2021
<b>Hearing adjourned</b>	Tuesday 25 May 2021
<b>Hearing Closed:</b>	Initially on Friday 6 August but re opened following receipt of further information from WDC on 17 August 2021 and finally closed on 1 November 2021

## INTRODUCTION

1. This decision is made on behalf of the Waimakariri District Council (WDC). We, Paul Rogers (Chair), Ken Fletcher and David Mountfort, all Independent Hearing Commissioners, have been delegated the authority by WDC under section 34A of the Resource Management Act 1991(The RMA) to hear and decide PC 30, primarily because WDC is a submitter to PC30.

2. We have been delegated authority by WDC to make a decision on PC 30 to the WDC Operative District Plan (ODP), after considering all of the submissions, the section 32 evaluation, the reports and evidence prepared by the officers and specialist reports for the hearing, the legal submissions made, and the evidence presented during and after the hearing.
3. PC 30 is a private plan change by RDL that has been prepared following the standard RMA Schedule 1 process and not any alternative streamlined or collaborative process now enabled under the RMA.
4. The expert evidence we received including the section 42A officer reports are detailed in Table 1 below.

**Table 1: Expert Evidence**

<b>Speciality Area</b>	<b>Reviewing Specialist</b>
Retail analysis, market demands, form and function of urban economies, forecasting-outcomes and effects/Economics	Mr Derek Foy (WDC) Mr Fraser Colegrave (RDL)
Urban Design	Mr David Compton-Moen (WDC) Mr Ian Munro (RDL)
Infrastructure- Water, wastewater and stormwater	Mr Kalley Simpson (WDC) Mr Elliot Duke (RDL)
Transport	Mr Shane Binder (WDC) Mr Andrew Metherell (RDL)
Planning	Mr Matt Bonis (WDC) Mr Cameron Browne and Mr David Haines (RDL)
Landscape and visual Amenity	Mr Tony Milne (RDL)

## **SUMMARY OF PLAN CHANGE**

5. The stated purpose of PC 30 is to enable and facilitate the development of a modern, master planned Town Centre to support the growth of Ravenswood as zoned Business 1 with a Key Activity Centre (KAC) notation and a limited associated objective and policy

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response (something we refer to later).

6. In particular, PC 30 seeks to rezone approximately 12.8 ha as Business 1 (Town Centre zone) within Ravenswood, and to provide statutory recognition for such being noted as a KAC with the stated intent of facilitating some 35,000 m<sup>2</sup> GFA of core retail activities. Core retail would be defined as a combination of general merchandise/comparison retail, and supermarkets. It does not include commercial services, that is banks, hair dressers etc, commercial offices, or trade suppliers.
7. As well, the relevant Outline Development Plan (North Woodend ODP-158) - and associated zoning has lost its integrity, with the quantum of retail activity provided for within the modest Business 1 zoning on the Ravenswood site transferred by resource consent (and encumbrance), and a consented, and partially built, subdivision pattern not reflecting the operative district plan provisions. Therefore PC 30 also seeks to amend ODP 158 and associated urban zoning (residential and business) to resolve the inconsistencies between the pattern of existing and consented land use, and the now obsolete ODP, as well as to provide the zoned Business 1 area and KAC noted above.
8. Of the 75 submissions received, 52 were in support, 15 provide support subject to amendment, and seven were in opposition. A neutral submission was received from Waka Kotahi (the New Zealand Transport Agency) (sub 23). In terms of a summary of the reasons accompanying the submissions the main themes are:
  - (a) those in support concluded that the PC 30 KAC would:
    - (i) be needed to meet and service the growing local community and passing traffic;
    - (i) provide a complementary role to Rangiora and Kaiapoi;
    - (ii) reduce congestion on the roads;
    - (iii) provide for new retail, offices and community services in the area; and
    - (iv) reduce spending leakage from the district.
  - (b) those that support but with amendments seek:
    - (i) also amending the Business 2 zone as proposed to Business 1;
    - (ii) including as Business 1 all of the land fronting Bob Robertson Drive;
    - (iii) that provisions in the plan do not conflate Ravenswood and Pegasus;
    - (iv) that the scale of the centre is inconsistent with the Waimakariri Development Strategy potentially resulting in adverse effects on other centres;
    - (v) amendments to the roundabout on State Highway One or reducing road speeds;
    - (vi) the provision of community facilities, enhancement of modal split and

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- ample car parking;
  - (vii) that traffic safety needs improving, including a pedestrian path or over bridge between Pegasus and Ravenswood, or lights;
  - (viii) the need for recreational activities for children;
  - (ix) that the density, design and function of the centre should be better defined; and
  - (x) amendments to the ODP to improve clarity as to Indicative and fixed development requirements to achieve a high quality centre.
- (c) those that oppose identify:
- (i) that PC 30 will fail as economies of scale are not available; and
  - (ii) that the roading infrastructure is not suitable for increased traffic flow.
- (d) a neutral submission was received from NZTA seeking additional analysis in terms of reliance on the Woodend Bypass.
9. These submissions and the implications of the associated relief sought have been considered, along with the evidence of the s42A officers and RDL witnesses, in reaching our overall decision.

## HEARING PROCESS

10. Prior to the hearing we issued a number of prehearing directions.<sup>1</sup> Those directions detailed a timetable for exchange of expert evidence. In addition, the directions encouraged prehearing caucusing, which occurred. Caucusing continued throughout the course of the hearing.
11. The hearing took place over the days detailed above. We received detailed evidence from RDL and the s42A officer group which we address below related to the key issues in contention. We received evidence from one submitter in person, Shona Powell, of the Woodend-Sefton Community Board.
12. Following the hearing, we issued a series of queries and questions (Minute 2 dated 25 May 2021) for the economic retailing experts enabling RDL and the s42A Officer Group opportunities to consider and respond to the expert evidence provided by each participant.
13. Primarily because of these necessary exchanges between RDL and the s42A Officer Group the process following the formal hearing stage has been longer than anticipated.

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<sup>1</sup> Minute 1, 17 March 2021

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14. As will become clear those exchanges related to issues of direct concern to RDL and the S42A officers, being related to retail distribution issues, and some issues concerning compliance with the code of conduct for experts.
  15. The retail distribution issues required responses from experts in this field. Similarly, the code of conduct issues related only to RDL and the S42A group. So, we had no need to include the submitter group in those later exchanges, primarily because the submitter group did not present expert evidence on retail distribution issues and were not engaged by the code of conduct issue.
  16. We issued Minutes 2 to 10 requesting further information on dates between 25 March 2021 and 1 October 2021 receiving responses on various dates, concluding on 18 October 2021.
  17. As noted above, we undertook a range of site visits, focusing on Rangiora and Kaiapoi town centres. We also visited the Palms and Northlands shopping malls in Christchurch for comparative purposes.
  18. We had no procedural matters to address and resolve.

## **RELEVANT STATUTORY PROVISIONS CONSIDERED**

### **Overview**

19. The RMA statutory provisions that require our close attention are the requirements that;
  - (a) a plan change must give effect to any national policy statement and operative regional policy statement (s75 (3)(a) and(c));
  - (b) a district plan change must not be inconsistent with an operative regional plan for any matter specified in s30(1), (s 75(4));
  - (c) we must not have regard to trade competition or the effects of trade competition (s74(3));
  - (d) each proposed objective is to be evaluated by the extent to which it is the most appropriate way to achieve the purposes of the RMA (s32(3)(a));
  - (e) the policies are to implement the objectives and the rules (if any) are to implement the policies (s75(1)(e) and (c));
  - (f) each proposed policy or method (including each rule) is to be examined, having regard to its efficiency and effectiveness, as to whether it is the most appropriate method for achieving the objectives (s32(3)(b)) of the district plan taking into account:
    - (i) the costs and benefits of the proposed policies and methods (including rules); and

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- (ii) the risks of acting or not acting if there is uncertain or insufficient information about the subject matter of the policies, rules and methods (s32(2)(c));
  - (g) when making a rule, regard must be had to the actual or potential effect of the activities on the environment (s76 (3));
  - (h) clause 10 of Schedule 1 of RMA requires us to include reasons for accepting or rejecting the submissions. A decision must include a further evaluation of any proposed changes to PC 30 arising from submissions with that evaluation to be undertaken in accordance with section 32AA;
  - (i) However, in terms of section 32AA we record that we were presented with PC 30 by RDL inclusive of its section 32 assessment. The section 42A Officer Group presented a “Reduced Version” of PC 30, with evidence in support, which effectively represents their section 32AA assessment;
  - (j) there was little in the way of further evaluation required arising from submissions that sought or proposed changes to PC 30. To the extent that submissions did propose changes the material contained within those submissions effectively represents any required section 32AA assessment. Accordingly, we have taken that material contained in those submissions into account.
  - (k) However, given the overall decision we have made, which is to decline or reject PC 30, section 32AA does not require much, if any, attention.

**Section 74(3): In preparing or changing any district plan, a territorial authority must not have regard to trade competition or the effects of trade competition.**

- 20. Because economic and consequent social effects, particularly the scale and extent of these, is one of the principal issues in contention, it is appropriate we comment here on our approach to s74(3).
- 21. We are alive to the point that business competition is considered beneficial and in the public interest. Legislation<sup>2</sup> other than the RMA confirms this. Provisions of the RMA reflect a statutory policy that the RMA is not to be used as a means of licensing or regulating competition.
- 22. We understand that the RMA is not concerned with the effects of trade competition on individual businesses, but it is concerned with the broader economic and social impacts which might flow if PC 30 were to result in the decline of existing shopping centres, such that they lost vitality, amenity or vibrancy, with consequent adverse effects on the community as a whole or in part.
- 23. We understand that there is no set definition of what effects are normally associated

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<sup>2</sup> Commerce Act 1986



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- with trade competition, or those broader impacts which are significant.<sup>3</sup> Such broader effects on existing centres might manifest themselves in a decline in the character and quality of the retail offer, a change in the character of centre patrons, a drop in patronage, locals having to travel further afield to meet their needs or a change in the centre's character for the worse.<sup>4</sup>
24. This might extend to a loss of investment in roading and other infrastructure, as well as the loss of amenity, which could result from the serious decline in the attractiveness or viability of the centre as a whole or in part.
25. Loss of employment opportunities on a significant scale might also qualify as adverse effects for these purposes. So too the possibility that important community services associated with shopping centres might cease to be appropriately located to serve their communities. Commercial services might also be affected in a similar way.
26. In summarised form, the definition of “*environment*” in s2 relevantly includes;
- (a) *People and communities;*
  - (b) *all physical resources (including land, buildings and infrastructure);*
  - (c) *amenity values; and*
  - (d) *the social and economic conditions which affect (or which are affected by) the matters in (a), (b), and (c).*
27. We understand the reference to “*people and communities*” is to be construed as excluding consideration of the effects of trade competition on trade competitors. Further, we understand the RMA is concerned with the broader effects of PC 30 on the community, and is consistent with the widely stated purpose of the RMA in s5 with its reference to enabling “... *People and communities to provide for their social, economic, and cultural well-being...*” However, court decisions have made it clear that any adverse social or economic effects must be significant<sup>5</sup> before they can be properly regarded as going beyond the effects ordinarily associated with trade competition on trade competitors.
28. The key point of distinction we have borne in mind between the adverse effects of trade competition on trade competitors and adverse effects which may properly be considered under the RMA, is that trade competition effects focus specifically on the impacts on individual trade competitors. In contrast, where a plan change such as PC 30 is likely to have more general effects on the wider community, then the RMA permits consideration of those effects.
29. We note that the proper approach to s74(3) is settled. The Environment Court<sup>6</sup> held

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<sup>3</sup> *General Distributors v Waipa District Council* (2008)15 ELRNZ 59 at [95]

<sup>4</sup> *Discount Brands Ltd v Westfield(NZ)* [2005] 2 NZLR 597 at [119]

<sup>5</sup> *Ibid -Discount Brands(SC) per Blanchard J* at [120]

<sup>6</sup> *Bunnings Ltd v Hastings District Council* [2011] NZEnvC330 at [30]

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that:

*“the term trade competition is constrained in its meaning to those matters arising directly out of rivalrous behaviour occurring between those involved in commerce.”*

30. However, despite s74(3), effects may go beyond trade competition and become effects on people and communities and their well-being, but they must be significant to be regarded as beyond the effects ordinarily associated with trade competition on trade competitors. The authorities<sup>7</sup> establish the following questions must be asked:
- (a) Are there effects beyond those caused by trade competition?
  - (b) Are those effects significant?
  - (c) Are those significant effects such that, weighed in the balance with all other relevant matters, the plan change, as applied for, should not be approved.
31. The scale or significance of such effects is a critical issue. We understand that the adverse effects of some other competing retail development do not have to be ruinous before they could be considered. Rather they must, at least pose significant risk of reducing the amenity, vitality or vibrancy of the centre as a whole, or in part, with ongoing consequential effects for the community served by that centre.
32. A community frequently invests substantial sums directly and indirectly in relation to existing centres. As well as retail activities, there are a range of community facilities established by councils and/or private providers. These are the kinds of facilities that provide amenity to the community in the form of a convenient location for shopping, community activities, and the commercial services. Substantial sums may have been spent on roading, street landscaping, and other infrastructure to support existing centres. Those substantial sums are commonly funded by ratepayers.
33. So, we recognise it is permissible for us to take into account significant adverse social and economic effects on such facilities which could flow from the approval of a plan change to establish a new retail and key activity centre. We also understand we must undertake an enquiry into the evidence received to establish the scale and/or significance of those effects. That enquiry may result in findings in relation to the scale or significance of those effects, and the risk that those effects might eventuate. We may reach the conclusion that there is uncertain or insufficient information to enable us to form a view on the scale or significance of those social and economic effects.
34. However, it is necessary for us to first consider and understand how trading and expenditure patterns may be affected by PC 30 in order that we can make an informed prediction about the significance of these social and economic effects, and whether amenity values of existing centres may be consequentially affected to a significant

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<sup>7</sup> *Discount Brands v Westfield (NZ) Ltd* [2005] 2 NZLR 597 and *General Distributors v Waipa District Council* [2008]15 ELRNZ 59 at [94](HC)[2009] 15 ELRNZ196 at [9](CA)

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degree.

35. We also record this enquiry and assessment does not occur in a vacuum. We must consider the statutory planning instruments at a national, regional and district level because they contain provisions relevant to, and informing, our consideration, particularly in relation to significance of effects. For example, if those planning provisions are protective of existing centres, that is important. Moreover, those planning provisions may in themselves identify for us the nature and significance of effects that those instruments seek to avoid.

### **Scope of our Power to Amend PC 30**

36. As will become apparent we are unable to approve PC 30 as advanced by RDL. WDC, in its submission, and through its evidence advanced a “reduced version” of PC 30. Unfortunately for reasons set out in detail later in this decision we cannot support and approve that “reduced version” of PC 30 as supported by WDC.
37. That outcome forced us to consider our ability to further amend PC 30 into a form which we considered could be approved. However, as we understand it, the process to assess the merits of a plan change is set out in clause 29 of Schedule 1 of the RMA, which directs us to assess the request in accordance with Part 1 of Schedule 1, unless that process is specifically modified by other parts of clause 29.
38. Part 1 of Schedule 1 includes clause 10, which provides we may alter or modify a request based on submissions received, or make consequential changes arising out of those submissions. However, we do not consider that clause 29(1) changes or modifies the effect of clause 10 such that we are entitled by virtue of clause 29(4) to make any changes or modifications to a plan change request that we consider appropriate. Essentially, as we understand it, any substantive alteration or modifications to a plan change request, must have a basis in a submission.
39. We note that the above does not limit our overall discretion to decline a request under clause 29(4).
40. We also understand that, if an applicant volunteers or proposes changes to its own plan change request that are within scope of the request, and those changes are intended to mitigate effects, and would not cause prejudice to others or the public interest, then those changes may be considered. However, that circumstance did not arise here.

### **Case Law**

41. The PC 30 application documents, legal submissions, evidence, and the section 42A report included references to settled case law that cover requirements for the formulation of plan changes and their consideration. These matters were not in dispute between the parties.
42. We confirm we have taken careful consideration of the case law in making our determinations. In particular, we have endeavoured to pay close regard to the approach

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taken by the Environment Court in *Colonial Vineyard Limited v Marlborough District Council*<sup>8</sup> when applying the statutory tests for a plan change. In summary these require that a plan change:

Assists Council in carrying out its functions including:

- (i) achieving integrated management of effects of the use, development and protection of land and associated natural and physical resources;
- (ii) ensuring that there is sufficient development capacity in respect of housing and business land to meet the expected demands of the district;
- (iii) controlling any actual or potential effects of the use, development, or protection of land, including for the purposes of the avoidance or mitigation of natural hazards;
- (iv) having regard to the actual and potential effects on the environment including in particular any adverse effect;
- (v) accordance with Part 2 of the RMA; and
- (vi) in respect of the existing statutory documents:
  - (aa) give effect to any national policy statement or operative regional policy statement:
  - (bb) have regard to any proposed regional policy statement, and any management plans and strategies prepared under any other Acts;
  - (cc) have regard to the extent to which the plan is consistent with the plans of adjacent territorial authorities: and
  - (dd) establish the most appropriate method for achieving the objectives and policies of the district plan, undertaking the assessment detailed in section 32.

## **PRINCIPAL ISSUES IN CONTENTION**

43. Having considered the original submissions and further submissions received, the section 42 A reports and accompanying evidence, RDL'S evidence legal submissions and representations made at the hearing and in response to our minutes seeking further information, we have identified the principal issues in contention as being the most determinative for the outcome.
44. So, our approach in this decision is to concentrate on the principal issues in contention. Retail distribution effects was the matter that was the subject of a significant proportion

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<sup>8</sup> *Colonial Vineyard Limited v Marlborough District Council* [2014] NZEnvC55 at [17] onwards.

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of the expert evidence we received. Consequently, a substantial part of our decision relates to retail distribution effects.

45. Under each principal issues heading we have endeavoured to analyse what we consider to be the relevant evidence received and then make findings which form the basis our section 32 and Part 2 evaluations and findings. The principal issues are:

- (a) Retail distribution effects
- (b) Management of urban growth and development
- (c) Urban design and visual landscape and amenity issues-
- (d) Transport efficiency issues
- (e) Other infrastructure issues
- (f) Planning instruments
- (g) Waimak Junction Consent

46. We now address them in turn.

#### **RETAIL DISTRIBUTION EFFECTS**

47. Under this topic we consider first the nature of the trade competitors involved in this case, then proceed to look in some detail at the retail model used to underpin PC 30. This allows us to draw conclusions about the outputs of the model, and then the modelled trade competition effects, and on to the potential retail distribution effects that are relevant to our decision.

#### **Who are, and are not, the trade competitors in this case? What might trade competition and the effects of trade competition look like in this case?**

48. RDL is the prime player in this application. RDL is a property development company. Their trade competitors are other property development entities. Their area of competition would be (relevantly)<sup>9</sup> in properties for development and for purchasers of the properties once developed.
49. It was suggested by Mr Croft that RDL is intending to hold ownership of the Ravenswood Commercial Area, which would add property investment/property management to the trades in which they were active competitors.
50. However, the evidence we heard is that they have to date sold most, if not all, of the land currently being developed under resource consent,<sup>10</sup> as well as land in the Ravenswood Commercial Area (RCA) that does not yet have a resource consent applied

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<sup>9</sup> RDL would also potentially compete in contracting and other trades that are not relevant to this case.

<sup>10</sup> We understand that Lots 2, 9, 10, 12, 13, 14 and 15, as well as the completed business subdivision, have been sold.

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for.<sup>11</sup>

51. Thus, the evidence does not support the claimed intention and we must work with the assumption that RDL is a property developer, not a property investor.

### **Evidence heard /read**

52. To assess the impact of the PC 30 KAC, Insight Economics had prepared a report "*Economic Assessment of Proposed Extension of Ravenswood Commercial Area*"<sup>12</sup> (the IE report). The core of this report is the Integrated Retail Model, a gravity model developed by Insight Economics, covering the Canterbury region.<sup>13</sup> We explored the model in some detail with Mr Colegrave to ensure as best we could that we understood the model.
53. After concluding his evidence, Mr Colegrave also supplied a written description of the model used in the IE Report. This document, **Explanation of Trade Impact Modelling**, "briefly describes the methodology used to estimate trade impacts via our *Integrated Retail Model*".<sup>14</sup> This document was most helpful, and we thank Mr Colegrave for it.
54. The Retail Market Assessment prepared by Property Economics in 2016 (the PE Report)<sup>15</sup> was only provided to us by Mr Colegrave after he had completed his evidence to the panel. Mr Colegrave made many references<sup>16</sup> to the PE Report in his evidence<sup>16</sup> (but did not attach it to his evidence), and never in a critical manner. We therefore consider that he supported it in all respects, and were comfortable in putting aspects of the PE Report to Mr Foy, without the need to recall Mr Colegrave.

### **The Retail Model**

55. We do not attempt to summarise the model below, but rather focus on the elements of relevance to our decision.
56. Mr Colegrave ran two scenarios through the model. Firstly, the actual and consented status quo, and then the Haines Proposal for PC 30, although we understand from Mr Haines that it was a combined effort. Mr Haines decided the proposed zonings of the various lots, which gave the total land area and total Gross Floor Area (GFA), while Mr Colegrave proposed the retail store types and their GFA, that might populate that area.<sup>17</sup> The two scenarios were detailed in Table 2 of the IE Report, which is reproduced below.

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<sup>11</sup> Lot 201.

<sup>12</sup> S32 Assessment, Annexure 1

<sup>13</sup> IE report 34 at 9.3

<sup>14</sup> Explanation of Trade Impact Modelling, unattributed

<sup>15</sup> Waimakariri District Development Strategy Retail Market Assessment, December 2016, prepared by Property Economics

<sup>16</sup> See for example Colegrave Evidence at 36, 37, 38, 59, 76 and others

<sup>17</sup> IE report at 4.4

## Table 2: Table 2 of IE Report

Table 2: Assumed Core Retail GFA for Each Scenario

Core Retail Store Types	Scenario 1 (Status Quo)	Scenario 2 (Haines Proposal)
Clothing, Footwear & Personal Accessories	350	3,500
Department Stores	0	5,000
Electrical and Electronic Goods Retailing	700	2,000
Food and Beverage Services	1,500	3,000
Food Retailing (incl. Supermarkets)	3,500	6,500
Furniture, Floor Coverings, Houseware & Textiles	0	4,000
Hardware, Building & Garden Supplies Retailing	0	7,500
Pharmaceutical and Other Store-Based Retailing	1,000	2,500
Recreational Goods Retailing	350	1,300
<b>Total Core Retail</b>	<b>7,400</b>	<b>35,300</b>

### Land Area and Gross Floor Area (GFA)

57. Mr Haines started with a land area proposed to be zoned B1 of 12.79 ha. We note Mr Bonis point<sup>18</sup> that this excludes the additional 5894 m<sup>2</sup> that had been intended to be open space in the original PC 30.<sup>19</sup> This additional area is part of Lot 203 and was excluded from PC 30 in the Table of Existing and Proposed Land Use and Zoning Scenarios,<sup>20</sup> Mr Haines has Lot 203 at 7.20 ha. The Ravenswood Proposed Zoning Map<sup>21</sup> gives the area of Lot 203 as 7.8029 ha. In what follows, we work with the 12.8 ha (rounded from 12.79) as most evidence and discussion did.
58. From the 12.8 ha, Mr Haines applies a 40% GFA coverage assumption (giving GFA of 51,200 m<sup>2</sup>) and a 70:30 Core Retail: Other Commercial split to give 35,840 m<sup>2</sup> GFA of Core Retail and 15,360 m<sup>2</sup> GFA of Other Commercial. After adjustment for the actual and consented GFA, these last figures become 35,306 m<sup>2</sup> of Core Retail GFA and 17,958 m<sup>2</sup> of Other Commercial GFA. We note that Mr Haines includes the 414 m<sup>2</sup> of the McDonalds on Lot 10 within his 35,306 m<sup>2</sup>, although this is proposed to be zoned B2 and is outside the proposed KAC (and not included in the 12.8 ha). We consider this appropriate, given the drawcard that McDonalds obviously is, but we do not consider that anything turns on this.
59. Utilising Mr Haines' table,<sup>22</sup> the proposed Zoning Map<sup>23</sup> and excluding the 5984m<sup>2</sup> of open space,<sup>24</sup> in Table 3 below, using the 40% GFA and 70% Core Retail assumptions, we find that the total possible Core Retail, if the 12.8 ha re-zoning as requested was granted, within the PC 30 KAC would be 35,800 m<sup>2</sup>.

<sup>18</sup> Bonis, Summary and Response at 40

<sup>19</sup> AEE at 6.5.8

<sup>20</sup> AEE attachment 2

<sup>21</sup> Sheet 7 to the Rough and Milne Landscape Assessment, Annexure 3 to the AEE

<sup>22</sup> AEE Attachment 2

<sup>23</sup> Sheet 7 to the Rough and Milne Landscape Assessment, Annexure 3 to the AEE

<sup>24</sup> Lot 203 is assessed at 7.2 ha not the full area of 7.8029 ha

60. Mr Haines has stated that LFR is readily consentable on B2 land,<sup>25</sup> and past practice by WDC would support him, so we consider it likely that Lot 201 (behind the BP/McDonalds) and Lot 2 (behind the Gull) will be LFR and so should be considered within the Town Centre. This gives a feasible Core Retail of 42,960 m<sup>2</sup>. Given Mr Haines has stated that the LFR in B2 could be consented at 40% GFA coverage (without the assumption of 30% Other Commercial), the 30% of Lots 2 and 201 (433+1534 =1967m<sup>2</sup>) are potentially available for Core Retail. Add in the 414 m<sup>2</sup> of Lot 10, and Mr Haines' 35,300 m<sup>2</sup> GFA Core Retail becomes a feasible Core Retail of over 45,000m<sup>2</sup>.

**Table 3**

<b>PC 30 KAC</b>	<b>Area (ha)</b>	<b>Total GFA @ 0.4 (m<sup>2</sup>)</b>	<b>Core Retail GFA @ 70% (m<sup>2</sup>)</b>	<b>Other Commercial 30% (m<sup>2</sup>)</b>
Lot 203	7.2	28,800	20,160	8,640
Lot 11	1.5657	6,263	4,384	1,879
Lot 202	0.361	1,444	1,011	433
Lot 12	0.2415	966	676	290
Lot 15	0.4681	1,872	1,311	562
Lot 13	1.0813	4,325	3,028	1,298
Lot 14	0.7106	2,842	1,990	853
Lot 2 New World	1.1574	4,630	3,241	1,389
<b>Total within Proposed KAC</b>	<b>12.7856</b>	<b>51,142</b>	<b>35,800</b>	<b>15,343</b>
Lot 2 (behind Gull)	0.3607	1,443	1,010	433
Lot 201	1.2787	5,115	3,580	1,534
<b>Total Feasible</b>	<b>15.343</b>	<b>61,372</b>	<b>42,960</b>	<b>18,412</b>

61. We explored with both Mr Colegrave and Mr Foy whether the 40% and 70% assumptions were appropriate, and they both agreed they were acceptable for this sort of assessment. We do note that they are not rigid and the actual outcome on the ground may turn out to be more or less than 40% GFA coverage, and there is no requirement that 30% of total GFA be Other Commercial activity. Further, we note that in the PE Report:

<sup>25</sup> AEE Attachment 2, Note 4 and confirmed in the hearing



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*“... projections are based on efficiently utilised land developments (average 45% GFA to land ratios) ...”<sup>26</sup>*

62. If PC 30 was able to achieve a ratio of 45% GFA to land area, then the Town Centre Core Retail could be over 50,000 m<sup>2</sup>.
63. For these reasons, we consider that an absolute cap on GFA within the PC 30 Town Centre/KAC to be appropriate. We explored with Mr Colegrave a possible GFA cap, and he agreed that, given he had assessed only 35,300m<sup>2</sup> of Core Retail<sup>27</sup>, he would be comfortable with a cap set at that level. RDL subsequently offered a rule that would impose a cap of 35,500m<sup>2</sup>.<sup>28</sup>

### **Population and District Household Spending**

64. The IE Report presents the Statistics NZ population projections for the Ravenswood neighbourhood,<sup>29</sup> giving the High, Medium and Low projections. Mr Colegrave stated that the district population projections used were those from 2018, which are based on the 2013 Population Census, and so may not fully capture the rapid growth post-earthquakes. The modelling has used the Statistics NZ Medium projection.
65. Mr Colegrave agreed that the High and Low projections give an indication of the uncertainty around the population projections. We discussed with Mr Colegrave the impact the Covid-19 border closures, and the related return of NZers with residency rights, might have on the uncertainty around the population projections. He agreed that Covid-19 related population movements does increase the uncertainty, and he considered the risk was on the high side. If he was doing the modelling again, he considered he might use the average of the Medium and High projections. Mr Foy stated he was comfortable with the use of the Medium projections.

### **Projected Growth in Floorspace Demand**

66. Using the projected population growth, and applying estimates of household expenditure by store type, assuming a 1% annual increase in real expenditure per household, future retail spending by store type of Waimakariri households is estimated.<sup>30</sup> We note that the Statistics NZ's Household Economic Survey (HES) results (which provide spending by store type by income bands) is rated up to match the BNZ Marketview estimates of total household expenditure by store type.<sup>31</sup>
67. The estimated increase in core retail demand by Waimakariri residents, of \$485m by 2048 was then converted to an estimated growth in core retail floorspace (GFA) using an *“estimated ratio of sales per metre of GFA”*.<sup>32</sup>

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<sup>26</sup> PE Report p 57 at 12.3

<sup>27</sup> IE Report at 4.4, Table 2

<sup>28</sup> RCP030 Attachment A Version L Post Caucusing 25 June (Reviewed) Final S 26a

<sup>29</sup> IE Report at 5.3

<sup>30</sup> IE Report at 7.2

<sup>31</sup> Explanation of Trade Impact Modelling at 4

<sup>32</sup> IE Report at 7.3

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68. When asked where this estimated ratio came from, Mr Colegrave only said that it was data provided by commercial contacts. He stated that such data was not readily available.
  69. We have no indication of how it relates to Canterbury (rather than, say, Auckland or Wellington), or to new builds (rather than established sites), or of the variability of sales per m<sup>2</sup> of GFA for each store type. Mr Colegrave did indicate that the data came from a variety of years and might be around 5 years old.
  70. We note that Mr Foy was in agreement with the IE Report's projected floorspace demand and floorspace productivity assumptions.<sup>33</sup> Mr Colegrave did confirm that no allowance had been made for increased productivity of existing stores, while acknowledging that this may be increasing at 0.25-0.5% per year. We note that this would decrease the requirement for additional core retail GFA by 5-10% over the forecast 20 years.
  71. The IE Report does not provide the amount of core retail GFA within Waimakariri, but does provide the "Supportable District Floorspace"<sup>34</sup> for 2018, an estimate of 78,000m<sup>2</sup>. This fits well with the 2016 actual retail floorspace of 73,780m<sup>2</sup> provided in the PE Report,<sup>35</sup> with allowance for the opening of the expansion to the LFR precinct on the East end of Rangiora town centre in 2017-18. Based on the 78,000m<sup>2</sup> estimate of the IE Report, Mr Colegrave's allowance for increasing store productivity could account for 7,800m<sup>2</sup> of the 76,960m<sup>2</sup> increase the IE Report estimates could be required by 2048.
  72. The PE Report states that within Waimakariri there is an estimated 13,000m<sup>2</sup> surplus of retail capacity, and concludes that not all new demand growth should be reflected in new build floorspace, as some could be accommodated in existing stores<sup>36</sup>. In combination with the potential for increased store productivity (7,800m<sup>2</sup>), this suggests that up to 20,000m<sup>2</sup> of the projected growth in retail demand could be accommodated within the existing floorspace. This could reduce the 76,960m<sup>2</sup> requirement for new floorspace identified in the IE Report<sup>37</sup> to 56,000m<sup>2</sup>, or a variance of 26% on the IE Report estimate.
  73. We conclude that there is considerable uncertainty in the amount of additional core retail GFA that the growth in Waimakariri retail spend will require by 2048, and the 76,960m<sup>2</sup> estimate in the IE Report is likely to be the upper limit.

#### **Leakage and Net Retention**

74. The IE Report identifies significant leakage of retail spending from Waimakariri households to other districts, mainly Christchurch City. It puts leakage out at 40% of

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<sup>33</sup> S42A Report, Foy at 7.1 (f)

<sup>34</sup> IE Report Table 8

<sup>35</sup> PE Report p 42, Table 7

<sup>36</sup> PE Report p 42

<sup>37</sup> IE Report Table 6

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Waimakariri retail spending,<sup>38</sup> while at the same time identifying that some 25% of spending in Waimakariri stores originates outside the district.<sup>39</sup>

75. The converse of leakage – Waimakariri residents’ spending in Waimakariri stores – the report terms as retention, and calls the aggregate for spending in Waimakariri stores (spending by residents plus non-residents in Waimakariri stores) net retention. Net retention for the district was estimated to be 80% in 2018.<sup>40</sup>
76. We note that this percentage is heavily influenced by food retailing (which has 100% net retention and makes up one-third of total spending), and that the remaining store type net retention ranges from 40% to 73%.<sup>41</sup>
77. The PE Report is broadly consistent with these estimates, although using data from three years earlier (2016 vs 2019), and predates the expansion of the LFR precinct and the Farmers reopening. It has a higher leakage estimate (48%) and only 23% of district spending coming from outside the district.<sup>42</sup>
78. In the modelling, the IE Report has assumed that total net retention will increase from 80% in 2018 to 86% in 2048, with all the improvement being in non-food retailing, such that the range of non-food retailing store type net retention would range from 60% to 80% in 2048<sup>43</sup>.
79. The IE Report postulates that the increase in net retention would be “particularly the result of the Ravenswood development.”<sup>44</sup> Mr Colegrave commented to us that the increased retention estimates were the result of expert judgement as to the effect over the 20 years, which were then spread equally across the 5-year intervals of Table 7 in the IE Report.
80. Mr Foy agreed with the IE Report’s assumptions relating to existing leakage and potential improvements in net retention<sup>45</sup>, although he did note in discussion with us that they were the result of an exercise of judgement. We do not understand there to be any metrics or method behind the increase in net retention assumptions, other than the judgement as to the effect of the development of Ravenswood arising from PC 30.

### **Net Retention and Trade Diversion**

81. Mr Foy demurred when we suggested that the if net retention was to increase as the IE Report assumed, then the first fruits would be the diversion of the 25% of spending in Waimakariri that currently comes from outside the district, from (largely) Rangiora and Kaiapoi shops, to the PC 30 centre.

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<sup>38</sup> IE Report p 25 & Fig 12

<sup>39</sup> IE Report Fig 13

<sup>40</sup> IE Report Fig 14 and Response to Question 5 of the Further information Request

<sup>41</sup> IE Report Table 7

<sup>42</sup> PE Report p 27

<sup>43</sup> IE Report Table 7

<sup>44</sup> IE Report p 27

<sup>45</sup> S42A Report, Foy at 7.1 (g)

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82. Mr Foy said we did not know why people from outside the district shopped in Rangiora/Kaiapoi – if it was while they were already visiting those centres (e.g. for family reasons) then he thought they would probably continue to shop in those centres. He did concede that if visitors were not visiting for purposes tied to Rangiora/Kaiapoi, and just shopping while there, then some of the current spend by outsiders (non-Waimakariri residents) in Rangiora/Kaiapoi may well divert to Ravenswood.
83. We agree with Mr Foy that we do not know why those from outside the district choose to shop in Rangiora/Kaiapoi. We note that to the extent that they divert from Rangiora/Kaiapoi to Ravenswood there would be no net loss to the district, but it would be a loss to Rangiora/Kaiapoi.
84. Given that outsiders' spend in the district makes up 25% of the total spend in the district, and this occurs largely in Rangiora/Kaiapoi, any significant diversion of this spend from Rangiora/Kaiapoi to Ravenswood would have a commensurate effect on Rangiora/Kaiapoi.
85. Our understanding is that this potential for the diversion of existing out of district spend in Rangiora/Kaiapoi to Ravenswood has not been explicitly modelled in the trade impact analysis. Therefore, to the extent that this diversion does occur, it will be additional to the trade impacts assessed in the IE Report.
86. At Table 8, the IE Report gives the results of applying the increase in net retention assumptions to the increased Waimakariri resident retail spend, expressed in terms of increased GFA able to be supported by Waimakariri residents.
87. We understood from Mr Colegrave that this utilised the same sales/m<sup>2</sup> GFA as discussed above. This has a projected increase in supportable floorspace of 71,400m<sup>2</sup> by 2048. We note the difference between the increase in supportable GFA of 71,400m<sup>2</sup> and the increase in demand for GFA of 76,960m<sup>2</sup>.<sup>46</sup>
88. We understand the difference to arise from the 40% spend that currently flows out of the district. So, of the 76,960m<sup>2</sup> increased demand, only 46,176m<sup>2</sup> (40%) would support Waimakariri stores if current retention rates were maintained through to 2048. The assumed increased net retention enables the additional 25,224m<sup>2</sup> of supportable GFA by 2048.

### **Modelling Trade Impact Analysis**

89. To estimate the trade impact of PC30 on other centres, the IE Report first models centre turnover without the PC 30 development. To do this, the store type expenditure generated by residents in each Census Area Unit (CAU) is matched to the corresponding store type in different centres.

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<sup>46</sup> IE Report Table 6

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90. The extent to which the expenditure by residents in a given CAU will be allocated to a given centre is determined by the driving distance from the CAU to the centre, and the attractiveness of the centre.
  91. As a proxy for the attractiveness of each store type within a centre to residents of a given CAU, the model uses the size of the centre. The model uses employment by store type to represent size. The combination of distance and attractiveness gives a score for each CAU-centre-store type combination.
  92. The market share that a given centre store type has from each CAU is then calculated by dividing the score by the sum of the scores for that CAU's expenditure in that store type.<sup>47</sup>
  93. These market shares are then applied to the modelled estimates of expenditure of each CAU to derive the value of sales at the centres where that expenditure is made.<sup>48</sup> Thus, centre turnover is estimated.

### **The Marketview Data**

94. Mr Colegrave refers to the Marketview data extensively in both the IE Report and his evidence, and it is referred to in the Explanation of Trade Impact Modelling. However, he did not provide any detail of what the Marketview data is.
95. Fortunately, the PE Report does.<sup>49</sup> There we learn that it is a Bank of New Zealand (BNZ) product, and covers all debit (i.e. EFTPOS) and credit card transactions of BNZ cardholders. It provides the spending of BNZ cardholders, coded to their meshblock of residence and the location and store type of their spending.
96. However, we do note that it covers only BNZ cardholder data, which we understand holds 15-20% of the market share in New Zealand,<sup>50</sup> and card transactions cover approximately 60% of all retail spending. Additionally, some 15-20% of transactions in the Waimakariri data do not have a meshblock of residence coding.
97. We accept that it is a valuable source of data for modelling exercises like that in the IE Report. A sample size of 9-12% is significant, but it is not a random sample and may have bias, depending on the structure of the BNZ customer base and BNZ's penetration within the Waimakariri market.
98. We also note that larger ticket items are more likely to be paid over time on internet banking than smaller purchases, and so LFR purchases may be under-represented within the Marketview data.

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<sup>47</sup> IE Report at 9.3 and Explanation of Trade Impact Modelling at 15 and 25-27

<sup>48</sup> IE Report at 9.3

<sup>49</sup> PE Report p 24

<sup>50</sup> The 2016 PE Report said "approximately 20%" while Mr Foy at the hearing said 15%.

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## The Attractiveness of Ravenswood

99. The model documentation is very clear that store type employment is used as the proxy for the attractiveness of a store and thus a centre. The IE Report stated:

*“... the ‘attractiveness’ of each retail location depends on the number of stores of each type, and their employment counts.”<sup>51</sup>*

100. The methodology statement reports:

*“For attractiveness, we simply take the total retail employment in each meshblock by store type.”<sup>52</sup>*

101. However, at the hearing we were repeatedly told, by different witnesses, that PC 30 would be a very attractive centre. We were told that the ease of access, the availability of extensive parking, the size of the centre and range of offer, the range of national brands, the location adjacent to State Highway 1, the high quality of centre amenity, the covered access to stores and the centre layout, would all combine to be a very attractive centre. The IE Report highlights many of these aspects in concluding that Ravenswood is:

*“...an ideal site to accommodate the district’s third Key Activity Centre”<sup>53</sup>.*

102. Mr Colegrave was firmly of the view that the PC 30 site would be so attractive that it would attract a significant level of shopping expeditions from Christchurch residents, despite the much larger and closer offering within the city.
103. We agree. If all the elements that have been canvassed in putting together the assessment criteria for PC 30 come together as everyone expects, it will be a very attractive retail destination. It will be attractive to both Christchurch and Waimakariri residents.
104. As such, while employment counts may be adequate as a proxy for attractiveness of other centres, we do not consider that centre employment is an adequate proxy for the attractiveness of the PC 30 centre. At best, employment count will provide a lower bound for the attractiveness of the centre, and will likely significantly understate the attractiveness of PC 30 as proposed, relative to other centres – like Rangiora and Kaiapoi.
105. In fairness to Mr Colegrave and the model, we note that Mr Foy conceded that the assessment of centre attractiveness was the most difficult part of modelling.

## Attractiveness of PC 30 to Waimakariri Residents

106. The IE Report claimed that:

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<sup>51</sup> IE Report at 9.5

<sup>52</sup> Explanation of Trade Impact Modelling at 26

<sup>53</sup> IE Report at 11.3

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*“... people who previously shopped at specific specialty stores in Rangiora will still return to those stores even if they frequent new stores at Ravenswood because those Rangiora specialty shops will remain the best way to meet those specific needs.”<sup>54</sup>*

107. This point was repeated by Mr Colegrave in his evidence,<sup>55</sup> and verbally in the hearing, in support of the modelled results showing only a small impact of Ravenswood on Rangiora.
108. Mr Foy was critical of the model results that PC 30 would draw only 14% of its sales from Rangiora and Kaiapoi, suggesting something like 40-50% of PC 30 sales would be diverted from these centres<sup>56</sup>.
109. In reply, Mr Colegrave claimed that:
- The model works at a regional level, with the attractiveness of PC 30 spreading its draw across a range of centres;<sup>57</sup>
  - Rangiora and Kaiapoi hold only small shares of sub-regional offer, so only a small proportion will be diverted from them;<sup>58</sup> and
  - The offer at Ravenswood by PC30 will be different from that of Rangiora and Kaiapoi, and so most of the sales at Ravenswood to Waimakariri residents will be that which currently leaks out of the district.<sup>59</sup>
110. The first point goes back to the attractiveness discussed above. While the PC 30 centre may well be attractive to Christchurch residents, it will be even more so to Waimakariri residents.
111. If Waimakariri residents are frequenting Ravenswood as Mr Colegrave suggests<sup>60</sup>, Mr Foy confirmed that they would likely do most of their shopping there, and would be less likely to make separate trips to Rangiora or Kaiapoi. While they may still visit the specialty shops in Rangiora that are not present in Ravenswood, as Mr Colegrave noted, they are likely to divert much of the shopping that is available in both centres to Ravenswood.
112. The second and third points above go to reduced leakage. While we accept that this will occur, it will take shoppers to Ravenswood more frequently, and they are likely to do their other shopping there as well, again increasing the diversion from Rangiora and Kaiapoi.

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<sup>54</sup> IE Report p 44

<sup>55</sup> Colegrave Evidence at 22 (g)

<sup>56</sup> S42A Report, Foy at 8.8

<sup>57</sup> Colegrave Evidence at 133 (a)

<sup>58</sup> Colegrave Evidence at 133 (b)

<sup>59</sup> Colegrave Evidence at 133 (c)

<sup>60</sup> IE Report p 44, repeated in para 106 above

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113. The third point above highlights the susceptibility of the model results to the store type scenario adopted. Mr Colegrave noted most of the sales at Ravenswood were in store types that have low representation in Rangiora and Kaiapoi.<sup>61</sup> We are very aware that the mix of store types modelled are the result of Mr Colegrave's judgement, and there is no control in the proposed rules over what actually eventuates. Although Mr Colegrave has modelled a retail offer with little overlap with that already in Waimakariri, and hence a preponderance of sales comes from spending that currently occurs outside the District, there is nothing that will require that to happen.
114. So, to the extent that what actually eventuates has more overlap with the offer at Rangiora and Kaiapoi than the assumed scenario, then the impacts on those centres will be greater. It also highlights that, even if the impact on the centres as a whole is not so great, the impact on those store types which do overlap will be greater.

### **Distance**

115. Road distance is a significant input into the model in terms of the market share of expenditure that each centre attracts for different locations.<sup>62</sup> We note that the recent opening of the Christchurch Northern Corridor has made access to Ravenswood from Christchurch so much easier. And the converse is of course true – that access to Christchurch from Waimakariri is also much better. Similar comments apply to the travel time benefit of Bob Robertson Drive once it is open to public use. While road distance is superior to straight line distance, as Mr Colegrave indicated was used in some models, it may be that driving time would be an improvement on driving distance.
116. We understand the modelled results were produced prior to the opening of the Christchurch Northern Corridor (CNC), which has changed both driving times and distance between Waimakariri and Christchurch. We are unclear as to whether the CNC was taken into account in the model, or how this might affect the modelled results. However, we do not consider that this will have a significant effect on the modelled results.

### **The 'Black Box'**

117. Mr Foy referred to the model as a 'black box'. By this we understand that he meant that much of the real work of the model is done within the model, and is not able to be scrutinised and evaluated from the outside.
118. The detail of the scores given to attractiveness and distance, the weights applied to them, and how the increasing net retention assumptions are applied, for any given store type-centre-origin combination is not able to be seen by him or us. The application of the crucial expert judgement is within the detailed model specification, and is not open to independent evaluation.

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<sup>61</sup> Colegrave Evidence at 142

<sup>62</sup> Explanation of Trade Impact Modelling at 15 and 25



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119. As we put it to Mr Colegrave, that is where the magic happens, and we understood that he acknowledged that that was the case. The ‘magic’ is the expert judgement and its application within the model, given the various input data, some of which has been discussed above.

### **Model Validation**

120. It is important to note that the modelled turnover results for PC 30, and the impacts on Rangiora, Kaiapoi and the northern Christchurch centres, are modelled estimates. They do not necessarily relate to actual dollar turnover at each centre. One indicator of how good the model is, would be how well the modelled results match actual centre turnover for a known year. I.e. if the model was run for 2018, how closely do the modelled results match the actual 2018 turnover for each centre of interest?

121. We questioned Mr Colegrave on this point – how had the model been validated against actual centre turnover data. He was clear that the model had not been validated in this way. He stated that actual centre turnover data was very difficult to obtain, which we acknowledge. By its nature, official statistical data is aggregated to avoid identification of individual players, and so is only available at regional and national levels

122. Mr Colegrave did state that the model was validated against the Marketview data, against which it measured up well. He quoted an R-squared of 95, although he was not specific as to which version of the model this related to – the model as used for the IE Report, the generic model for greater Christchurch, or the model as used elsewhere, or for what time period.

123. We note that the Marketview data is also used as an input into formulating the model.<sup>63</sup>

124. The IE Report claims that the model has:

*“... accurately predicted real world transactions ... across all major urban areas of New Zealand”<sup>64</sup>.*

125. Given the unavailability of centre level detail, we take this to be predicted against the Marketview data.

126. We questioned Mr Colegrave whether any validation of forward predictions was undertaken – i.e. projections in say 2013 forward to 2018 compared to actual outcomes for 2018. Mr Colegrave was clear that this sort of validation had not been done.

### **Ravenswood Estimated Turnover**

127. The model estimates the 2028 turnover of Ravenswood at \$148m.<sup>65</sup> Below in Table 4 we compare the implied Ravenswood Sales per GFA with the average Sales per GFA used in the IE Report to calculate the projected floorspace demand.

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<sup>63</sup> See Explanation of Trade Impact Modelling at 4 & 8, and IE Report at 7.4 & 7.5 for example.

<sup>64</sup> IE Report at 9.3

<sup>65</sup> IE Report, Table 10

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128. As can be seen, the Ravenswood Sales/GFA is consistently significantly lower than the average used in the IE Report, ranging between 60-80% of the store type average Sales per GFA. This is surprising, given the attractiveness of the centre discussed above.
  129. The IE Report gives no explanation of the derivation of the estimated sales of the PC 30 centre, and there is no obvious reason why the Ravenswood Sales per GFA results should be so much lower than the average.
  130. Given the attractiveness of the centre, we would expect the Sales per GFA to be at least the average level and probably higher. If Ravenswood Sales/GFA were higher, the draw from outside Ravenswood (Rangiora/Kaiapoi and Christchurch) would also be that much higher, with potential consequences for the distributional impacts on Rangiora and Kaiapoi.
  131. Alternatively, if the lower Sales per GFA had been used in assessing retail demand within Waimakariri, then the supportable store type GFA referred to above would be that much lower
  132. If Ravenswood Sales/GFA reflected the average Sales/GFA used to estimate projected demand, then total Ravenswood sales would be in the region of \$207m, some \$60m higher than the model estimates. A significant portion of this higher sales level would be drawn from Rangiora and Kaiapoi, given the net retention rates discussed above.

**Table 4: Comparison of Ravenswood Sales per GFA with the Average used to calculated projected increased demand**

	Ravenswood GFA Haines PC 30 <sup>1</sup>	Ravenswood 2028 Sales \$m 2	Ravenswood Sales/GFA 3	IE Report Average Sales/GFA 4	Ravenswood Sales/GFA as % IE Report Average 5
Clothing, Footwear & Personal Accessories	3500	\$13.6	\$3,882	\$5,600	69.3%
Department Stores	5000	\$11.5	\$2,291	\$3,600	63.6%
Electrical and Electronic Goods Retailing	2000	\$12.5	\$6,261	\$7,300	85.8%
Food and Beverage Services	3000	\$13.1	\$4,366	\$7,100	61.5%
Food Retailing (incl. Supermarkets)	6500	\$48.0	\$7,388	\$10,000	73.9%
Furniture, Floor Coverings, Houseware & Textiles	4000	\$8.5	\$2,120	\$3,500	60.6%
Hardware, Building & Garden Supplies Retailing	7500	\$26.5	\$3,532	\$4,800	73.6%
Pharmaceutical and Other Store- Based Retailing	2500	\$10.2	\$4,092	\$5,000	81.8%
Recreational Goods Retailing	1300	\$4.1	\$3,189	\$5,100	62.5%
<b>Total</b>	<b>35300</b>	<b>\$148.0</b>			

Sources

1. IE Report Table 2
2. Colegrave, Further information, Question 4
3. Calculated as Sales\*1000000/GFA
4. IE Report Table 6
5. Calculated as Ravenswood sales/GFA / IE Report Average sales/GFA

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133. Regardless, the divergence between the Sales/GFA used to derive projected demand and the derived Sales/GFA for the supply that satisfies the demand, seems anomalous. We have concerns that the model is under-estimating the level of sales at the proposed Ravenswood centre, and thus under-estimating the magnitude of the trade impacts on Rangiora and Kaiapoi.
134. In his response to Minute 6 on Waimak Junction, Mr Colegrave reported that recent work he had undertaken subsequent to the hearing showed that retail productivity (sales per GFA) in Waimakariri were 15% below the national average<sup>66</sup>. He took this to mean that supportable GFA in Waimakariri to 2048 is about 14,000m<sup>2</sup> higher than he had assumed in the IE Report<sup>67</sup>. We note that the reverse is also true – increasing Waimakariri retail sales productivity levels to just the national average would decrease the need for further retail GFA by a similar amount.

### **Trade Impacts on Rangiora and Kaiapoi**

135. Mr Foy was doubtful about the modelled result that only 14% of Ravenswood projected sales would be diverted from Rangiora and Kaiapoi.<sup>68</sup> He was of the view that 40-50% of Ravenswood's sales would be diverted from Rangiora and Kaiapoi's B1 zones.<sup>69</sup>
136. In our further information request of Mr Colegrave, we asked for a breakdown of the 2028 Ravenswood sales of \$148m by the originating locations. This shows that the model estimates \$56.9m to come from the area for which Ravenswood is the closest KAC, \$38.7m to come from the rest of Waimakariri and \$25.5m to come from Christchurch City residents.<sup>70</sup>
137. Thus, Ravenswood is estimated to attract \$25.5m from Christchurch City residents, with the much wider offer available to them, at closer distances, but will attract only \$38.7m from Waimakariri residents.
138. We also requested the demand originating in the area for which Ravenswood was the closest KAC - \$144.7m in 2028. This indicates that only 39% of the demand originating in the area for which Ravenswood is the closest KAC will be spent in Ravenswood.<sup>71</sup> Therefore 60% will leak out of the immediate catchment to either elsewhere in Waimakariri, or to Christchurch and further away.
139. It seems that Ravenswood is disproportionately attractive to Christchurch residents, compared to both Ravenswood residents, for whom it is the closest KAC, and other Waimakariri residents, for whom it is the closest alternative to the existing offer in Rangiora and Kaiapoi.

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<sup>66</sup> Colegrave Supplementary Evidence at 17

<sup>67</sup> Colegrave Supplementary Evidence at 18

<sup>68</sup> S42A Report, Foy at 8.4

<sup>69</sup> S42A Report, Foy at 8.8

<sup>70</sup> Colegrave Further Information, Question 4

<sup>71</sup>  $\$56.9 / \$144.7 = 39\%$

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140. We suspect that within the black box, the use of centre size as a proxy for centre attractiveness, the relative weights given to attractiveness and distance for each origin-centre combination, and the application of the assumed increased retention and net retention estimates, is working to mis-state the balance of sales but understate the draw from Waimakariri versus Christchurch. Like Mr Foy, we are doubtful that only 14% of the sales at the Ravenswood centre would be diverted from Rangiora and Kaiapoi.

### Trade Impacts

141. The IE Report and Mr Colegrave were clearly of the view, based on the modelling, that the trade impacts on most nearby KACs (including those in Northern Christchurch) will be “relatively minor”, and only “slightly higher” on Rangiora.<sup>72</sup> Mr Colegrave also concluded that PC 30, as modelled, “... poses no material risk of significant retail distribution effects on Rangiora ...”<sup>73</sup> He concluded that it was unlikely that any Rangiora stores would close,<sup>74</sup> that people who currently shop at Rangiora specialty stores would continue to do so,<sup>75</sup> and that existing retailers were unlikely to relocate en masse to Ravenswood.<sup>76</sup> The IE Report expressed the view that trade impacts would have to be “very high” to go beyond trade competition effects and into the realm of distribution effects.<sup>77</sup>
142. Mr Foy took a different view, partly from his scepticism of the modelling results<sup>78</sup>, but also because he took a different view of distributional effects. He considered that enabling an “unsustainably large” centre
- “... is likely to result in opportunity costs for the Rangiora and Kaiapoi KACs, whereby they develop more slowly ... (and) take longer to generate a critical mass of economic activity that will support new retailers.”<sup>79</sup>*
143. In discussion with us, he held that an overly large Ravenswood would, over time, see fewer people in Rangiora, resulting in a loss of vibrancy, and a lack of private reinvestment, so buildings would look old and shabby. This ‘spiral of decline’ might require a greater public investment in the centre to slow the decline.
144. Mr Foy pointed out that if Ravenswood proceeded with 35,500 m<sup>2</sup> GFA it would “take a very large share of short-medium term growth of retail supply.”<sup>80</sup>
145. Mr Colegrave stated that the proposed B1 zoning of 12.8 ha will provide for all the B1 requirement of the next 30 years under the PE Report’s moderate growth scenario, and

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<sup>72</sup> Colegrave Evidence at 21

<sup>73</sup> Colegrave Evidence at 22

<sup>74</sup> Colegrave Evidence at 22 (e)

<sup>75</sup> Colegrave Evidence at 22 (g)

<sup>76</sup> Colegrave Evidence at 22 (h)

<sup>77</sup> IE Report at 10.3

<sup>78</sup> S42A Report, Foy at 8

<sup>79</sup> S42A Report, Foy at 9.5 (b)

<sup>80</sup> S42A Report, Foy at 12.4 (a)

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over 50% of the future B1 land requirement under the accelerated scenario.<sup>81</sup> Mr Foy pointed out to us that, if Ravenswood was enabled to the extent proposed it was likely that there would be little or no expansion of the retail GFA in Rangiora or Kaiapoi until after Ravenswood had been fully developed.

### **The Modelled Effects of Ravenswood – Summary**

146. Above we have dug into parts of the model in some detail. This should not be taken as a criticism of the model per se. We recognise that modelling retail centres and their effects on each other is complex and demanding, and the IE Report is clear throughout, through the use of terms like “model”, “estimates”, “projections” and “assumptions”, that it is not precise, and there are judgements that have to be made. We have identified the following issues with the model, as discussed above:

- the lack of allowance for increased productivity of existing stores;
- the potential for productivity improvements in Waimakariri to match the national average;
- the potential for there to be existing surplus capacity that has not been allowed for;
- the likely diversion of out-of-district custom from Rangiora to Ravenswood;
- the use of employment counts being a poor proxy for the attractiveness of the centre;
- the potential bias in the Marketview data;
- the lack of any independent validation of the model against current reality or of projections against actual outcomes;
- the susceptibility of the sales outcomes at Ravenswood, and the effect on Rangiora and Kaiapoi, to the store type GFA mix that eventuates, compared to that modelled;
- the seemingly low level of sales/GFA at Ravenswood; and
- the divergence between the implied Sales/GFA and the average Sales/GFA used to estimate projected demand.

147. We acknowledge that the model has been validated against the Marketview data, but remind ourselves that the Marketview data is itself an input into the model, and may not be an adequate reflection of the real world. Regardless of the model’s ability to reflect the world as it is, we are less certain about the model’s predictive accuracy into the future – the world that may be, given the lack of any testing of predicted future outcomes against actual future outcomes. This concern is heightened given the minimum ten-year forecast period (from the 2018 base), stretching out to 25 years.

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<sup>81</sup> Colegrave Evidence at 118

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148. We do have some concerns about Mr Colegrave's apparently unquestioning reliance on the model results as facts. Words like "*estimates*", "*projections*" and "*assumption*" are used for a purpose.
149. They highlight that there is uncertainty involved. He agreed when we put to him that Statistics NZ production of the High, Medium and Low population projections are an indication of the level of uncertainty in the population projections used in the model. But at no point in the IE Report, his Statement of Evidence, or his discussions with us did Mr Colegrave volunteer any weakness in the data used in the model, or the assumptions that have been applied in the model.
150. Garbage-in-garbage-out clearly does not apply here, but the ideal inputs into the model are often simply not available, and other sources must be used. Hence, the use of Marketview data to validate the model, the use of "*Household Economic Survey estimates scaled up to Marketview estimates*",<sup>82</sup> the use of sales/GFA provided by commercial contacts, and the extensive use of Marketview data at various points in formulating the model. Although they are not necessarily the preferred data, they are the best available.
151. But they all introduce a degree of uncertainty – of both sample error and non-sample error, of an unknown degree. This is expected and accepted as a part of modelling, but it should not be ignored or swept under the carpet. In using the results of modelling, the uncertainty inherent in the process should be acknowledged and presented. It should also be reflected in the certainty with which the conclusions relying on the model are made.
152. To summarise, we have identified the following sources of uncertainties arising from the modelling:-
- The extent of core retail GFA that might result from the proposed rezoning.- it might be the promoted 35,500m<sup>2</sup>, but it could as easily be over 50,000m<sup>2</sup>;
  - That indicated by the High, Medium and Low population projections, and the impact of Covid-19;
  - The use of BNZ Marketview data in combination with Household Expenditure Survey data;
  - The ratio of sales/GFA used to estimate floorspace demand;
  - The susceptibility of the sales outcomes at Ravenswood, and the effect on Rangiora and Kaiapoi, to the store type GFA mix that eventuates, compared to that modelled;
  - The effects of increasing productivity (sales/GFA) of existing stores;

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<sup>82</sup> Explanation of Trade Impact Modelling at 4

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- The potential for existing Waimakariri stores to increase their productivity levels to at least national average levels;
  - The extent of surplus retail capacity and the effect on future supply required;
  - The extent to which the assumed gains in net retention will actually be achieved;
  - The extent of the diversion of existing out-of-district expenditure from Rangiora to Ravenswood;
  - The use of Marketview data to validate the model, given the potential biases discussed, as well as its use in formulating the model; and
  - The opening of the Christchurch Northern Corridor.
153. As a result, we consider that the modelled results have considerable uncertainty around them, that they should probably be considered as, at best, the lower limit of the trade impacts of the proposed centre on Rangiora and Kaiapoi, and that the trade impacts may well be much greater than the modelled results indicate.
154. Mr Colegrave has relied upon the modelled results, without apparent consideration of the uncertainties identified above, in his assessment that the distributional effects would fall below the significant threshold required to be of concern. As such we consider that his assessment can only set the lower limit of the distributional effects that would flow from the proposed centre if it was fully developed by 2028 as modelled.

#### **Have Rangiora and Kaiapoi recovered from the effects of the Earthquake?**

155. Objective 6.2.5 of the Canterbury Regional Policy Statement (CRPS) states:

##### ***6.2.5 Key activity and other centres***

*Support and maintain the existing network of centres below as the focal points for commercial, community and service activities during **the recovery period**:*

*The Central City*

*Key Activity Centres*

*Neighbourhood centres.*

156. And the principal reasons and explanation for this objective begins:

*It is important to maintain the existing network of Key Activity Centres and the Central City as focal points for commercial, community and service activity during the **recovery phase** and to support the identified priority areas.*

(Emphasis added)

157. Although both Mr Haines and Mr Bonis made reference to CRPS Objective 6.2.5, neither explicitly put it into the context of the recovery period. When this aspect of the objective was brought to their attention, Mr Haines considered that Ravenswood, in "*planning*



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*and policy terms" was part of the "existing network of centres", and therefore within the KACs to be supported and maintained during the recovery period.*

158. When the clear separation of existing and proposed KACs in the definition<sup>83</sup> was brought to his attention, Mr Haines seemed to concede that Ravenswood fell outside the protection of this Objective.
159. Ms Eveleigh submitted in support of Mr Haines' original position, that the inclusion of Pegasus-Woodend in the list of existing KACs in the definitions of the CRPS made Woodend-Pegasus an existing KAC for the purposes of the CRPS provisions<sup>84</sup>. She went further, submitting that the placement of the Woodend-Pegasus KAC star on Map A should now be seen as indicating Ravenswood<sup>85</sup>.
160. In discussion with us, Mr Haines agreed that if Waimakariri had identified the third KAC in the period following the inclusion of Chapter 6 in the CRPS, that they would have placed it at either Woodend or Pegasus, but not at Ravenswood, as Ravenswood as a commercial centre did not exist at that time.
161. Further, we note that the KAC star on Map A is very clearly not located at the Ravenswood Commercial Area or anywhere near it, but is located just inside the then edge of the Woodend urban area, at approximately 133-137 Main North Rd, Woodend.
162. This Objective raises the question – When does the recovery period/phase come to an end? No-one at the hearing was aware of anything in the CRPS or the recovery legislation that placed an end date on the recovery. Mr Bonis opined that the recovery period was potentially live until something replaced or modified Chapter 6 of the CRPS.
163. We note that the introduction to Chapter 6 of the CRPS states that the chapter provides:
- a framework for the recovery of Greater Christchurch, to enable and support earthquake recovery and rebuilding, including restoration and enhancement, for the area through to 2028.*<sup>86</sup>
164. So, it appears that the recovery period extends to at least the end of 2028.
165. In light of this, the question of whether Rangiora and Kaiapoi KACs, town centres and other relevant centres have recovered from the earthquakes is relevant to our decisions. The IE Report states that spending in Rangiora "*increased dramatically following the ... earthquake and has remained high*"<sup>87</sup>, and that Kaiapoi "*... appears economically stronger than prior to the earthquakes.*"<sup>88</sup>
166. We asked both retail experts whether Rangiora and Kaiapoi had recovered from the earthquakes. Mr Colegrave considered they had recovered. In response to a question

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<sup>83</sup> CRPS p 247

<sup>84</sup> Eveleigh Submissions in Reply (SIR) at 4.

<sup>85</sup> Eveleigh Submissions in Reply (SIR) at 6

<sup>86</sup> CRPS p 68

<sup>87</sup> IE Report at 8.2

<sup>88</sup> IE Report at 8.3

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arising from our site visit as to the quality of the retail offer in Rangiora, Mr Colegrave agreed that it was not high quality. He stated that there was a mixture of some comparison shopping, in amongst the lower order offer.

167. Both Mr Colegrave and Mr Foy indicated they had only seen “*a few*” vacancies in Rangiora. Mr Foy considered that the level of sales per capita seemed vibrant. Both mentioned the new Farmers and Blackwells buildings, and Mr Colegrave was taken with the new apartment accommodation building completing construction on the corner of Ivory and High St.
168. Mr Foy considered that Rangiora retail area was in reasonably good health, but thought that Kaiapoi was a different story. He commented on the large red zone area and the plans for it as a mixed use zone. He considered that Kaiapoi town centre was still in recovery from the earthquakes.
169. Ms Eveleigh, in her closing submission, conceded that the earthquake recovery in Kaiapoi “*was not complete*”<sup>89</sup>.
170. Neither retail expert was able to offer any indication as to the extent of buildings requiring further strengthening to meet the building code requirements. Mr Bonis stated that there were a number of earthquake prone buildings identified on the MBIE EBE register, although he did not consider they were widespread.<sup>90</sup>
171. Mr Foy acknowledged that his assessment of the state of the centres was based on a “*walk around and look*” and that he had done no formal assessment. Mr Colegrave’s opinion seemed to be based on the same “*walk around and look*” assessment. Neither gentleman offered any metrics to support their view. When asked directly whether he considered a “*walk around and look*” was sufficient to make an assessment as to the recovery of the centres, Mr Foy stated that it was. He stated that metrics like sales/GFA were hard to obtain.
172. Chapter 6 of the CRPS came out of the Land Use Recovery Plan, which is a statutory document prepared under the Canterbury Earthquake Recovery Act 2011 for the express purpose of supporting the recovery and rebuilding following the earthquakes of 2010 and years following. The Recovery Act, and hence chapter 6, was a major departure from business as usual, as deemed needed to respond to the destruction, disruption and dislocation brought about in Greater Christchurch (including Rangiora and Kaiapoi) by the Canterbury earthquake sequence.
173. Given the significance of the earthquakes and their effects, and the substantial statutory weight behind Objective 6.2.5, we consider that something more than a “*walk around and look*” is required to properly assess whether the existing Waimakariri KACs have recovered or are still in the “*recovery phase*”.

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<sup>89</sup> Eveleigh Closing Submission at 23 (b)

<sup>90</sup> Bonis, Summary and response at para 41

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174. As a minimum we would expect some form of qualitative assessment of the KACs today against pre-earthquake characteristics, and how they might have developed given population changes in the absence of the earthquakes. An investigation to determine whether there was any useful quantitative data would also be expected.
175. We note that Messrs Foy and Colegrave both have their lives north of the Bombay Hills, so we would not be surprised if they did not have personal professional knowledge of Rangiora and Kaiapoi pre-earthquake, and neither of them indicated that they did have such knowledge. Mr Foy appears to have been working with the WDC since 2014<sup>91</sup>, while Mr Colegrave stated that he had “recently” done some work within the district, but otherwise referenced work elsewhere in Greater Christchurch with no indication that that pre-dated the earthquakes<sup>92</sup>.
176. It is possible Mr Foy was a little hasty in withdrawing his proposed limit of 18,000 m<sup>2</sup> GFA until 2028<sup>93</sup>. CRPS Objective 6.2.5 very clearly requires that the Rangiora and Kaiapoi KACs be **supported and maintained** during the recovery period. The recovery period appears to run to at least 2028, and we have insufficient evidence to conclude that Rangiora and Kaiapoi KACs have in fact recovered.
177. Putting a lower limit on retail activity at Ravenswood until after 2028 would be one way to support and maintain the Rangiora and Kaiapoi KACs.

### **Retail Distribution Effects**

178. The starting point in assessing the distributional effects is defining the natural or physical qualities, characteristics and amenity values of Rangiora and Kaiapoi town centres (KACs) that contribute to people’s appreciation of the pleasantness, aesthetic coherence, cultural and recreational attributes?
179. Town Centres are described in Policy 16.1.1.3 of the Operative District Plan as the Business 1 zones of Kaiapoi, Rangiora, Pegasus and Woodend. There is some confusion in the district plan as to whether or not these are also Key Activity Centres, with the reason for Policy 16.1.1.1 stating:
- The Business 1 Zone covers the Rangiora, Kaiapoi, Oxford, Woodend, Pegasus town centres and Ravenswood and defines the key activity centres for business, social, community, cultural and administration activity for those towns.*
180. However the definition of Key Activity Centre in the plan is more restricted and states;
- means commercial centres identified as focal points for employment, community activities, and the transport network; and which are suitable for more intensive*

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<sup>91</sup> Mr Foy authored the 2017 ME report on Woodend, which in turn references a 2014 report that we understand was also authored by ME, and presumably Mr Foy was involved in this.

<sup>92</sup> Colegrave Evidence at 5 & 6

<sup>93</sup> S42A Report, Foy at 14.5

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*mixed-use development. The location of the Key Activity Centres are Rangiora and Kaiapoi shown on District Plan Map 181.*

181. For the purposes of this decision we adopt the definition and Planning Map 181 of the Operative District Plan.

### **Rangiora**

182. The KAC at Rangiora is the Business 1 zone and a strip of Business 2 land to the east of the Business 1 zone along the railway line. It is centred on High St but extends to Blakett St in the north, King St in the West, Queen St in the south and an irregular boundary extending as far as East Belt in the east.
183. A separate large format retail precinct containing businesses such as such as The Warehouse, Noel Leeming and Supercheap Auto is adjacent to the east across the railway, partly in the Business 2 and partly in the Residential 2 zone. This is partially within the KAC boundary on the Planning Map 181 Operative District Plan.
184. South Brook is a large commercial area near the southern edge of Rangiora. It is zoned Business 2. It contains the large Mitre 10 Mega and Pak 'n Save shops. It is not part of the Rangiora Town Centre or the KAC.
185. The Rangiora Town Centre/KAC contains a wide range of shops and community facilities including the District Council headquarters. Most of the smaller shops are along High St, with on-street parking and large public car parks to the rear of the business premises.

### **Kaiapoi**

186. The Kaiapoi Key Activity Centre is the Business 1 zone. It is centred on Williams St and Raven Quay south of the Kaiapoi River and Williams St and Charles St north of the river. This area was severely affected by the earthquakes and contains a number of prominent new buildings, notably the Council Service Centre and Library and the Blaketts Department Store.

### **Findings**

#### **Rangiora**

187. On our site visits we observed that in Rangiora the cafes and open food service venues were well patronized and busy. The street and shops were sparsely populated. The quality of the retail offer was moderate to low. There was little comparison shopping of quality, and what there is of medium quality and price bracket.
188. The Farmers Department shop was the top of the retail offer, and there were a number \$2 type shops and tattoo parlours. There were a significant number of vacant shops.
189. There are some obvious earthquake replacement buildings on the main street but also some ageing and not well-maintained buildings. Otherwise, most new buildings are off the main street.

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190. The standard of on-street public amenity is average, with some quite pleasant newer spots. Back street and off-street parking was well populated. On-street parking was busy, with high level of churn. Parks were taken soon after they are available.
  191. There are only isolated examples of upstairs apartments, other than the new building on the corner of High and Ivory Street that Mr Colegrave was taken with.
  192. The retail area is functioning but clearly has capacity for more business and the replacement of ageing buildings, should there be demand for this. Overall, we thought this is a centre which might be vulnerable to any significant retail distribution effects, should these arise.

### **Kaiapoi**

193. Retail and commercial businesses extend beyond the B1/KAC zone along the Williams St corridor to the north and south into the Business 2 and Residential 2 zones.
194. On our site visits we observed plenty of spare on-street parking. Cafes and open food outlets were only moderately patronized and not that busy. There were few people on the street and in the shops.
195. There is a very limited retail offer, with Blakeley's Furniture Shop and Blackwells Department Store, the only offer of any quality, the rest being below average. Public amenity around the river is very good, elsewhere average at best.
196. Overall we consider the Rangiora Town Centre has mostly but not entirely recovered from the earthquakes. The Kaiapoi Town Centre has some impressive new buildings but appears to have some way to go before it is fully recovered from the earthquakes.

### **How will expenditure and trading patterns be affected by the PC 30 KAC?**

#### **Findings**

197. We have detailed our concerns with the modelling in the sections above. As a result, we consider that the modelled results have considerable uncertainty around them, that they should probably be considered as, at best, the lower limit of the trade impacts of the proposed centre on Rangiora and Kaiapoi, and that the trade impacts may well be much greater than the modelled results indicate.
198. We find that it is very unclear as to how household spending and retail trading in Waimakariri will be affected by the proposed Ravenswood KAC. Mr Colegrave's modelled results indicated that only 14% of Ravenswood projected sales would be diverted from Rangiora and Kaiapoi (reference).
199. Mr Foy was sceptical about this estimate, considering that the level of diversion would more likely be in the 40-50% range<sup>94</sup>. We lean towards Mr Foy on this issue, and consider that the extent of trade diversion would be significantly higher than the modelled results.

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<sup>94</sup> S42A Report, Foy at 8.8

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## What are the possible and likely Retail Distribution effects of the proposed Ravenswood KAC on Rangiora and Kaiapoi?

200. Having found that the effects of the PC 30 KAC on the expenditure and retail trading patterns in Waimakariri, while uncertain, are likely to be closer to Mr Foy's estimation of 40-50% trade diversion from Rangiora and Kaiapoi, we must now consider the likely retail distribution effects.
201. Mr Colegrave considered that the retail trade effects on Rangiora and Kaiapoi will not be significant, and will not result in adverse retail distribution effects.<sup>95</sup> Mr Foy considered that PC 30, at the size proposed, would result in opportunity costs for Rangiora and Kaiapoi, such that they would develop more slowly, and take longer to develop the critical mass of economic activity needed to attract new retailers to the district.<sup>96</sup> Mr Foy estimated that the level of sales anticipated at Ravenswood would capture up to 50% of the increase in expenditure in Waimakariri over the period from now until to 2035, and 35% of the increase to 2048.<sup>97</sup>
202. Mr Foy acknowledged that quantifying trade competition effects was difficult, but after caucusing he still considered the effects on Rangiora and Kaiapoi could be 18% and 10% respectively.<sup>98</sup>
203. In discussion with us, Mr Foy elaborated on this, indicating that it was likely that Ravenswood would capture all the expenditure growth within Waimakariri until Ravenswood was fully developed.
204. This would impact on investment in Rangiora and Kaiapoi, such that there was likely to be no new investment or reinvigoration of these town centres until after Ravenswood was fully developed. He considered that there would be a loss of employment in, and attractiveness of, Rangiora and Kaiapoi town centres, with not as many people on the streets, and buildings would lack refreshment, and start to show it, resulting in a loss of vibrancy and amenity.
205. While he did not anticipate a spiral of decline into *tumbleweeds*, he did expect the decline to be such that considerable public investment in the centres may be required, in an attempt to reverse the decline.

### Findings

206. If Ravenswood was enabled and developed to the size proposed, we expect that the Woodend-Pegasus-Ravenswood residents would transfer most of their retail expenditure from Rangiora and/or Kaiapoi to Ravenswood, to the extent that the actual store type mix that eventuated at Ravenswood allowed. There may be redirection of spending otherwise done in Christchurch to Ravenswood by local residents as well.

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<sup>95</sup> Colegrave EIC at 12

<sup>96</sup> S42A Report, Foy at 9.5(b)

<sup>97</sup> S42A Report, Foy at 9.7

<sup>98</sup> Economics Joint Witness Statement p 2

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207. As a result, there would be a reduction in patronage and spending in Kaiapoi and Rangiora. Consequentially, there may be some closures of businesses within Rangiora and Kaiapoi, some of whom might relocate to Ravenswood. There may be some consequential loss of employment within the centres. These would be the effects of trade competition.
  208. In addition, we consider that there would be considerable redirection of spending by other Waimakariri residents (those for whom Rangiora or Kaiapoi was the closest KAC) from Rangiora and Kaiapoi to Ravenswood.
  209. Given the attractiveness of Ravenswood that everyone was agreed on, and the likelihood that Ravenswood would include a retail offer that was not elsewhere available in Waimakariri, or not to the same extent, we consider this to be inevitable, and probably to a much greater extent than Mr Colegrave's modelled result indicate.
  210. While shopping at Ravenswood, other Waimakariri residents would also shop for goods that were otherwise available in Rangiora and Kaiapoi. While Ravenswood will reclaim some spending by other Waimakariri residents from Christchurch centres, we consider it will claim significantly more from spending that would otherwise be done in Rangiora and Kaiapoi. This will further decrease the patronage and spending in Rangiora and Kaiapoi, increasing the likelihood of shop closures and lost employment in those centres. These also would be the effects of trade competition.
  211. Further still, some 25% of retail spending in Waimakariri is sourced from non-Waimakariri residents<sup>99</sup>. Mr Foy noted in discussion with us that to the extent that this spending was not part of a visit that was tied to Rangiora or Kaiapoi specifically, then that spending may also be redirected from Rangiora and Kaiapoi to Ravenswood.
  212. Although it may not be a zero-sum game, the enablement of a significant quantity of new retail supply in one location (Ravenswood) not matched by similar increases in retail demand within the locality of Ravenswood, will have commensurate effects on the retail supply in other locations operating in the same broad market. If there is not increased demand to match the increased supply, then supply will adjust, by reducing quantity and/or quality.
  213. Beyond the effects of trade competition, we consider it unlikely that the retail vacancies created in Rangiora and Kaiapoi centres would be replaced by shops offering the same or higher quality of retail offer. We consider it more likely that the higher level retail operations would establish at the new Ravenswood centre, rather than backfilling vacancies at Rangiora or Kaiapoi.
  214. Further, we consider Mr Foy is likely to be correct, in that any new retail development will be at Ravenswood, rather than Rangiora or Kaiapoi, until Ravenswood has been fully

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<sup>99</sup> IE Report at 7.5

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developed. And that most of the growth in retail supply in the Waimakariri market will accrue to Ravenswood, at least in the foreseeable future.

215. We consider it likely that the development of PC 30 will result in the retail offer at Rangiora, and especially Kaiapoi, at best stagnating, and probably declining in both quality and quantity.
216. There will probably be a consequential decline in patronage in Rangiora and Kaiapoi, both in numbers and in value of spend, reducing the vibrancy and amenity of both town centres.
217. These are retail distribution effects beyond the normal effects of trade competition, and we consider that they will be significant.

### **Staging**

218. Mr Foy initially proposed staging of PC 30 as follows:-
  - 18,000m<sup>2</sup> of retail GFA to 2028
  - 22,500m<sup>2</sup> of retail GFA to 2033
  - 25,500m<sup>2</sup> of retail GFA to 2038
  - 29,000m<sup>2</sup> of retail GFA to 2043
219. Following caucusing, he revised his PC 30 to a single staging limit of 25,000m<sup>2</sup> retail GFA until 2033.
220. Mr Colegrave did not consider staging necessary at all. The essence of his thinking is summed up in his belief that Ravenswood would be primarily serving the Waimakariri residents' spending that is currently occurring in Christchurch<sup>100</sup>.
221. Above we have found that Mr Colegrave's estimates of the impacts on Rangiora and Kaiapoi have considerable uncertainty attached to them, and at best should be considered as the lower limit of the trade impacts. We have further found that at the size proposed there would be significant retail distribution effects on Rangiora and Kaiapoi.

### **Findings**

222. Therefore, we agree with Mr Foy that the area of retail GFA at Ravenswood should be limited to a level significantly less than that proposed through to at least 2033. We consider that limiting the scale of Ravenswood GFA to a level more proportionate to the local market for which Ravenswood is the closest KAC would limit the retail distribution effects on Rangiora and Kaiapoi to an acceptable level.
223. However, given the Ravenswood residential area will be fully populated over the next few years and, absent significant new residential developments in the Woodend-

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<sup>100</sup> Economic Joint Witness Statement p2



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Pegasus-Ravenswood area, it is likely to grow only slowly over the years beyond, we do not see that removing the retail GFA limitation at some arbitrary point, to be appropriate.

224. The future is unclear, and rather than second guess now at what point in the future it may be appropriate for the size of Ravenswood to grow, we consider this should be given the appropriate consideration at that future time when the environment has changed.
225. While we consider that the amount of retail GFA allowed at Ravenswood should be substantially less than what is being proposed, we do not consider that staging (lifting the limit at some arbitrary point in the future) is appropriate.

**Given those trading pattern and retail distribution effects on Rangiora and Kaiapoi, what are the social, economic and amenity effects on the natural or physical qualities and characteristics of Rangiora and Kaiapoi that contribute to people's appreciation of their pleasantness, aesthetic coherence and cultural and recreational attributes.**

226. We have found above that Rangiora and Kaiapoi will likely lose patronage on three fronts:-
- (a) Those Waimakariri residents for whom Ravenswood is the closest KAC will likely redirect most of their retail activity to Ravenswood, only shopping in Rangiora and Kaiapoi if what they seek is not available in Ravenswood, or if they have other reason to travel to those centres.
  - (b) Other Waimakariri residents are likely to redirect significant parts of their spending from Rangiora/Kaiapoi to Ravenswood. While utilising Ravenswood for both items and the experience of the new centre, shopping that could also be done in Rangiora/Kaiapoi would be done in Ravenswood.
  - (c) An unknown but significant proportion of the 25% of spending in Rangiora/Kaiapoi that originates from outside the district, will redirect to Ravenswood.

These are the effects of trade competition.

227. Mr Colegrave estimated the magnitude of these trade competition effects. Of the estimated \$148m dollars of Ravenswood sales in 2028, he estimated that \$22m would come from the Rangiora and Kaiapoi KACs, \$22m from the rest of the district, with the bulk, \$104m, coming from outside the region.<sup>101</sup>
228. Above we have found that the modelled results have considerable uncertainty around them, that they should probably considered as, at best, the lower limit of the trade impacts of the proposed centre on Rangiora and Kaiapoi, and that the trade impacts may well be much greater than the modelled results indicate.

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<sup>101</sup> Colegrave Further Information Request Response to Question 2A

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229. As an example, consider food and grocery retail, for which district net retention is 101% - the value of sales in the district matches the demand generated within the district. There is some leakage to Christchurch, but it is matched by the inward flows from outside the district.
230. Mr Colegrave estimates the demand for food retailing within the Ravenswood catchment<sup>102</sup> to be \$57.5m in 2028.<sup>103</sup> He estimates Ravenswood food retailing sales in 2028 to be \$48m,<sup>104</sup> net retention of 83%, significantly different from the district net retention of 101%. We acknowledge that there are brand choices available in the wider district, but note that his modelled scenario does almost double the food retailing supply in Ravenswood.<sup>105</sup>
231. However, of that \$48m sales made in Ravenswood in 2028, Mr Colegrave estimates that only \$21.6m of it would come from within the district (\$5.6m from Rangiora KAC, \$3.3m from Kaiapoi KAC and \$12.7m from the rest of the district).<sup>106</sup> The remaining \$26.4m is coming from outside the district, putting food retailing inward flows to Ravenswood at 55%. This puts Ravenswood retention at only 37.6% - only 37.6% of food retailing purchases by Ravenswood residents will be done at Ravenswood. Given the tendency to do the grocery shopping at the nearest or most convenient location, this seems very low.
232. If the trade distribution effects of Ravenswood on Rangiora and Kaiapoi are likely to be larger than Mr Colegrave's estimate of \$22m, how high might they be? Mr Foy considered that 40-50% of Ravenswood's sales would come from Rangiora and Kaiapoi.<sup>107</sup> This would put the trade competition effects on Rangiora and Kaiapoi in the range of \$59.2-\$74m in 2028. This would put the diversion of sales from Rangiora and Kaiapoi to Ravenswood in the range of 18-23% of their combined 2028 sales. We consider that trade competition effects of this magnitude to be very significant.
233. How likely are Mr Foy's estimates? As a check on this we explore the three sources of trade diversion from Rangiora and Kaiapoi to Ravenswood identified above.

**1. Ravenswood residents diverting shopping from Rangiora & Kaiapoi to Ravenswood.**

234. Mr Colegrave estimates the demand from the Ravenswood area to be \$144.7m in 2028.<sup>108</sup> Using Mr Colegrave's retention figure of 60% across all store types,<sup>109</sup> this would put Ravenswood residents spending in Waimakariri at \$83m. Using the same 60% retention applying to the Ravenswood retention vis-à-vis the rest of the district, this

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<sup>102</sup> The area for which Ravenswood is the closest KAC.

<sup>103</sup> Colegrave Further Information Request Response to Question 3

<sup>104</sup> Colegrave Further Information Request Response to Question 2A

<sup>105</sup> 6,500m<sup>2</sup> GFA compared to the 3,500m<sup>2</sup> GFA of the recently opened supermarket.

<sup>106</sup> Colegrave Further Information Request Response to Question 2A

<sup>107</sup> Foy EIC at 8.8

<sup>108</sup> Colegrave Further Information Request Response to Question 3

<sup>109</sup> IEL Report Fig 14

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would put trade diversion of spending by local residents from Rangiora and Kaiapoi to Ravenswood at \$52m.

**2. Diversion of spending by other Waimakariri residents from Rangiora and Kaiapoi to Ravenswood.**

235. Mr Colegrave estimates total district spending at \$846m in 2028.<sup>110</sup> Subtracting spending by Ravenswood residents of \$144m, gives \$702m of spending by other Waimakariri residents. Allowing for 60% retention, this would put spending by other Waimakariri residents in Waimakariri at \$421m. Not all of that will be spending within the KACs, so we exclude 60% of the \$265m of spending outside the three KACs,<sup>111</sup> i.e. \$159m. This gives \$262m ( $\$421m - \$159m = \$262m$ ) spending by other Waimakariri residents in the Rangiora and Kaiapoi KACs. If only 10% of this was diverted from Rangiora and Kaiapoi to Ravenswood, this would be \$26m.

**3. Diversion of spending by non-Waimakariri residents.**

236. Mr Colegrave identified that 25% of spending across all store types within Waimakariri comes from outside the district.<sup>112</sup> Applying this to the total 2028 spending in Rangiora and Kaiapoi KACs of \$316m,<sup>113</sup> gives total spending in Rangiora and Kaiapoi KACs from outside the district of \$79m. If Mr Colegrave's estimate of total trade diversion from Rangiora and Kaiapoi to Ravenswood of 6.8%<sup>114</sup> is used, then trade diversion of spending from outside the district would be \$5m.

237. Bringing these three sources of trade diversion as estimated above together, this would put the 2028 trade diversion from Rangiora and Kaiapoi to Ravenswood at \$83m, outside the upper end of Mr Foy's range of \$59-74m. While we recognise that this exercise is only an approximation, and involves some assumptions, we are only using it as a cross check on Mr Foy's range of trade diversion. It is based on figures provided by Mr Colegrave.

238. Our main assumption is that 10% of spending by other Waimakariri residents in the Rangiora and Kaiapoi KACs is diverted from those centres to Ravenswood. Given the attractiveness of the Ravenswood centre that all parties agree on, and that some of the offer will not be available elsewhere in Waimakariri, and so Mr Colegrave's expectation is that other Waimakariri residents will shop there (hence the postulated increase in net retention), we consider this to be reasonable. We note that if only 5% was diverted (i.e. \$13m) then trade diversion at \$70m would still be within Mr Foy's range.

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<sup>110</sup> IEL Report Table 5

<sup>111</sup> Colegrave Further Information Request Response to Question 2A

<sup>112</sup> IEL Report table 13

<sup>113</sup> IEL Report table 9,  $\$79m + \$237m = 316m$

<sup>114</sup> Colegrave Further Information Request Response to Question 2A  $(17.6+4.3) / (243+80) = 6.8\%$

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## Findings

239. We accept Mr Foy's expectation of trade diversion from Rangiora and Kaiapoi to Ravenswood of 40-50%, and note that this puts it in the range of \$59m-\$74m, which would be 18-23% of the combined sales of Rangiora and Kaiapoi in 2028. We find this level of trade diversion to be very significant. These are trade competition effects.
240. These trade competition effects will have very significant flow on effects on the wider amenity, vitality and viability of Rangiora and Kaiapoi. These wider distribution effects may include:-
- A shift in shopping patterns of Waimakariri residents away from Rangiora and Kaiapoi to Ravenswood;
  - Low growth of patronage of Rangiora and Kaiapoi retail areas, and possibly absolute decline;
  - Increasing levels of vacancy and/or longer periods of vacancy before replacement tenants were found;
  - A downward shift in the per visit value of spend in Rangiora and Kaiapoi;
  - A shift in the nature of shopping trips and the type of patronage of Rangiora and Kaiapoi;
  - A change in the mix of the retail offer available at Rangiora and Kaiapoi, as individual operations closed or relocated;
  - A downward shift in the quality of the retail offer;
  - A shift of non-retail commercial and community activities away from Rangiora and Kaiapoi to Ravenswood;
  - Lower levels of private investment in the Rangiora and Kaiapoi commercial zones;
  - Lower levels or lack of building refurbishment.
241. These are effects beyond trade competition effects and are environmental effects that are to be had regard to. Given the vulnerability we have found in both Rangiora and Kaiapoi, and that Kaiapoi particularly has not recovered from the effect of the earthquakes, and the proposed scale of PC 30, these adverse effects on the vitality, vibrancy and amenity of Rangiora and Kaiapoi are likely to be significant.
242. PC 30 will put a brake on refreshment, development and redevelopment, the retail offer will stagnate or decline, and the ambience and vibe of Rangiora and Kaiapoi KACs will shift downward. These will be significant adverse distributional effects.

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**What level of certainty/uncertainty do we have to draw conclusions as to significance or otherwise of those effects?**

243. As noted above, we consider that there is a considerable degree of uncertainty in the estimates of the trade competition effects of Ravenswood on Rangiora and Kaiapoi. We find that Mr Colegrave's estimates are likely to be the lower limit of the trade competition effects. While we generally accept Mr Foy's estimates, we accept that they also could be on the low side, and the effects may be even larger than he expects.

**Consider the time frame over which those effects may arise/occur**

244. There was considerable discussion at the hearing as to how quickly PC 30 would be developed. Messrs Foy and Colegrave considered it unlikely that it would be fully developed by 2028, expecting to take longer for the market to develop to make the full development viable. Therefore, they considered that the effects would play out over multiple decades, rather than years. Mr Croft was of a very different view, considering that it would be developed very rapidly, and he expected the commercial development could be fully built by 2028.

245. We note that the Ravenswood residential development is selling very rapidly, to high demand, and that RDL was surprised by the strength of the sales. It will be fully sold and occupied within the next 2-3 years. There are also other residential developments underway in the greater Woodend area. It appears the local market will be very substantial, and still growing, by 2028. Mr Colegrave was adamant that the market for Ravenswood is dominated by that Waimakariri spend currently going into Christchurch, and also viewed Christchurch as a strong source of spend in Ravenswood. It appears that all the key aspects of Ravenswood's retail market will be in place and mature by 2028.

246. Even if Ravenswood does not develop to the full scale enabled by 2028, the trade competition effects still come into play from the time the scale is enabled, even if the effects cannot be realised until leases come up for review.

**Findings**

247. We agree with Messrs Foy and Colegrave that the market will determine the rate at which the allowed retail GFA will be put in place. We note that part of that market is the commercial drivers behind RDL to maximise the return on their investment, and this will encourage maximising the pace of development. The local residential demand is likely to be substantially in place within the next two or three years. The wider Waimakariri and Christchurch demand is already in place. Mr Croft indicated that they already have one major brand lined up, and others in serious negotiation. The market appears to be ready to build out whatever is allowed within a relatively short span of years.

248. We agree with Mr Croft that Ravenswood retail activity is very likely to be in place and populated to the full extent allowed by the district plan by 2028. We note that once Ravenswood is enabled by this plan change, it will be 'in the market' and the market will

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respond to the future that will include Ravenswood at the GFA permitted by the plan. Other players will be considering their options and responses from that point in time, not the date when Ravenswood is open for retail sales.

249. We note that trade competition is not a discrete point in time event, but is on-going, and plays out over an extended period. Trade competition effects may take several years to become apparent as commercial contracts come to their end and commercial actors respond to the market they face, and expect to face into the future. They will come into play from the time there is some certainty about the actual and anticipated or projected level of development at Ravenswood.
250. As such, trade competition effects are already in play, following from the opening of the supermarket and the development of the consented retail area adjacent to it. They will only accelerate as the future size and scale of the retail offer as per this plan change at Ravenswood becomes known and is put into place. Trade competition effects will continue to play out over the years afterward Ravenswood is developed. Therefore, the trade competition effects are likely to be in play well before 2028.
251. Likewise, the wider retail distributional effects also play out over time, starting from the first responses to the enablement of Ravenswood, accelerating as the opening of the first of the retail offer at Ravenswood approaches, and accumulating as the retail offer develops and the trade competition effects play out.

**Consider if, given timeframe for effects to arise, will Rangiora and Kaiapoi have time to respond and or re-invent?**

252. The Rangiora and Kaiapoi KACs are not unified entities, but are composites made up of all the landowners and retail and commercial operators within them. The landowners and business operators do not make large scale decisions based on the needs of the KAC. They act as individuals looking at their own situation and what they perceive as the best path forward for them and their asset or business. They will react differently, in different directions and in different timeframes. Many of the retail responses will be the trade competition effects identified above – closure, relocation, and scale up or down.
253. Responses of non-retail actors are beyond trade competition, and may include reinvestment, diversification or divestment of investment, delayed maintenance or refurbishment, offering rental discounts to attract or retain tenants, relocation of non-retail business, exiting the market, changing shopping behaviour and visitation patterns or other responses. Service businesses – lawyers, accountants, medical services etc. - will respond separately as they react to best service their clients and expand their own market. Responses from the District Council in the form of investments in streetscape, lighting, seating, plantings etc., or in shifting service locations are likely to come later as the distribution effects become apparent and the Council responds to those changes.

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## Findings

254. How and when Rangiora and Kaiapoi KACs respond to the trade competition effects of enabling Ravenswood, as they play out in the Waimakariri retail market, is very difficult to predict. Given the diversity of owners and operators, it is highly unlikely to be unified, rapid or an effective counter to the impacts of the trade competition and distributional effects brought about by the enablement of Ravenswood.

## MANAGEMENT OF URBAN GROWTH AND DEVELOPMENT

255. It has become common in recent years for district plans seeking to manage urban growth and development in developing greenfield or brownfield areas to rely on Outline Development Plans (ODPs). These ODPs are embedded in the district plans.
256. ODPs seek to achieve integrated management. They are typically applied to local areas identified for growth including both greenfield and brownfield development sites. ODPs delineate the locality of land use activities and of key infrastructure networks within the identified area including primary transport links, stormwater and wastewater networks, community facilities and open space. They can also delineate the activities and performance standards for that site.
257. A key purpose for ODPs is to identify from the outset the range of land use activities that are intended or will be required by the time the area is fully developed and to ensure sufficient and appropriately located space is retained in the developing area for all those activities. In the absence of such forward planning there is a risk that more commercially attractive activities such as business or housing will establish early, leaving insufficient or poorly located space for less commercially attractive activities, such as public open space and community facilities, or that provision for key structural elements such as roading connections is not retained until required.
258. A second and related key purpose of ODPs is to ensure that development is attractive, appealing and environmentally sustainable from the outset through to completion.
259. A difficulty that has occurred with the use of ODPs over time has been the inevitability of unanticipated change in the way areas develop, due to such factors as new ideas, developing trends, changing preferences and priorities and changes in commercial realities. Planning systems based on ODPs contain the potential to become inflexible and outdated. For this reason, district plans commonly also include objectives and policies which describe the intentions for the area and provide the ability for departures from ODPs through resource consents. Sometimes over time the point will be reached where ODPs need to be reviewed and replaced, and this requires plan change proceedings.

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260. The current Waimakariri District Plan contains ODP 158 for the Ravenswood commercial and residential areas. It no longer reflects the reality on the ground or the future intentions of the developer, RDL.
261. RDL has become frustrated with the ODP concept because of experience with earlier developments, and has proposed an alternative, more flexible system based on objectives and policies which specify how the area is to develop, and rules which provide a framework for that development. Central to this would be the preparation of a “concept masterplan” which would sit outside the district plan and be able to be adapted and replaced from time to time.
262. This approach was summarised in the planning evidence of Mr Cameron Browne RDL as follows:

*“Upon recommendation from Mr Ian Munro (RDL’s urban design adviser), an additional requirement for a concept masterplan and urban design report to accompany each resource consent application has been added recently. This will allow the Council to determine whether the built environment outcomes are being met and provides a long-term view to the development of the town centre and KAC’s development over time.”<sup>115</sup>*

263. The PC 30 rules provide that development activities in the Ravenswood Business 1 Zone would be non-notified, restricted discretionary activities. The concept masterplan and urban design report would be listed as information required to be provided with a restricted discretionary activity application.<sup>116</sup>
264. As we understand it, the intention is that the first concept masterplan would be produced for the first resource consent application after PC 30 is adopted and would cover the entire Ravenswood Business 1 zone. Subsequent resource consent applications for later stages would either reflect that masterplan or propose a new masterplan that still achieved the objectives and policies of the district plan but in a different way. We understand that it is intended that subsequent masterplans would replace earlier ones, but this is not stated in the rule.

### **Concept Master Plan - Issues**

265. We have identified some potential issues with the proposed approach which we discuss now.
- (a) **Certainty for those affected by the District Plan with subsequent resource consenting/notification issues.**
- (i) The owners and operators of activities established at each stage of development will inevitably have been influenced by the current concept masterplan in their choices, firstly to come to Ravenswood and,

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<sup>115</sup> Cameron Browne Evidence paragraph 13

<sup>116</sup> Proposed new Rule 31.25.4B



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secondly in the longer term characteristics of their chosen sites and those around them. They might be affected by subsequent stages and wish to make submissions on them but would be denied this opportunity by the non-notification rule.

- (ii) Therefore, we think there would be the risk of uncertainty for existing owners or occupiers about the effects of future PC 30s, coupled with an ability to submit, due to the non-notification clause.

(b) **Certainty for us as Commissioners.**

- (i) We are being asked to accept a system which relies on a set of rules based on a plan and document that has not even been written/prepared at the time of our decision.
- (ii) We are completely unable to judge the suitability of even an initial concept masterplan against the requirements of the existing and proposed district plan objectives and policies, nor those of the Canterbury Regional Policy Statement, which is discussed further below.
- (iii) Consequently, we do not consider we can carry out an adequate assessment of the PC 30 under s32AA of the RMA when this critical component does not yet exist. The only controls that might give any assurance that this would be an acceptable system is that subsequent versions would still need to give effect to the objectives and policies specific to Ravenswood, that are proposed to be inserted, as interpreted by the Council and the RDL at the time, with no rights of participation by adjacent occupiers or the wider public.

(c) **Does a concept master plan provide too much licence to the RDL?**

- (i) It seems to be an assumption that subsequent masterplans would replace earlier ones, but this is not stated in the rule and we do not see how it could be, as this would require the rule to refer to documents that are outside the district plan.

(d) **It would take only another resource consent to bypass a current concept masterplan. Is this sufficiently secure?**

- (i) A concept master plan would be given effect only through a resource consent which may or may not be implemented. It would be perfectly possible for subsequent landowners to apply for a resource consent without even including a masterplan. This would still be a restricted discretionary activity, but would risk being rejected by the WDC for failure to provide required information.<sup>117</sup> At this early stage we lack the certainty that the WDC would do this. In our opinion this may create an

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<sup>117</sup> Under section 88 of the RMA

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incentive for developers to bypass the concept masterplan approach altogether.

- (ii) The matters for discretion do not include reference to either any existing masterplan or the new one proposed. There is some overlap between the matters for discretion in the proposed rule and the required contents of a masterplan. It is unclear whether an application is intended to be considered against the previous or the new proposed masterplan or both. As the masterplan is not included in the matters for discretion, it may even be unlawful to consider it, although for the proposed system to work we consider it would have to be considered, or otherwise what is the point of it?
- (iii) There is provision in the RMA for bulky technical material to be “*incorporated by reference*” but this material would need to be in existence at the time the district plan was adopted<sup>118</sup> so that it can be properly referenced. It is also a requirement that material incorporated by reference can only be changed or varied by plan change or variation processes,<sup>119</sup> which would rule out the PC 30 to substitute masterplans by resource consents.
- (iv) We consider it would be desirable for the matters for discretion to include the extent of conformity to the existing masterplan and whether proposed amendments or replacement masterplans continue to give effect to the objectives and policies. However, for the reasons we have already discussed, i.e. the necessity of referring to materials outside the district plan, we do not consider this legally possible.
- (v) It is not clear to us what happens to an existing concept masterplan when a new one is proposed. Is there to be a full replacement? There is no statement on this in the proposed rules, and we doubt that there could be such a rule in any case. The existing masterplan would be part of a resource consent, and it is not possible for a subsequent resource consent to modify an earlier one, except as a variation under section 127. There is therefore a possibility to have multiple and conflicting masterplans in existence.
- (vi) A statement by Mr Browne in his evidence illustrates the confusion, where he wrote,<sup>120</sup>

*“This allows the ODP to be continually updated and refined based on feedback from the buildings and activities already established,*

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<sup>118</sup> See RMA Schedule 1 Part 3 Clause 30.

<sup>119</sup> Ibid Clause 31

<sup>120</sup> Cameron Browne, EIC Para 81.

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*using the cumulative effects principle to add imperative to subsequent applications to achieve the objectives of the KAC.”*

- (vii) In fact, there is no such provision for updating the ODP. It would remain in the district plan, and it would not be possible to update it in this way without another change to the district plan.
- (e) **What happens when land subject of the plan change changes in ownership or control? Who owns the master plan? Should it be the Council, and if so, should it be on the district plan, i.e. as an Outline Development Plan.**
- (i) It is unclear to us who would “own” the concept masterplan once it is part of an approved resource consent. We foresee possible issues with interpretation and version control, and a possible inability to resolve these issues with processes under the legislation.
- (ii) We were not referred to, nor able to find any decisions of the Environment Court or higher courts that discuss or shed any light on these issues, possibly because this appears to be a new approach.

### **The Evidence**

266. In their evidence for the RDL, Mr Munro and Mr Cameron discussed the advantages of the Concept Master Plan approach over the use of a fixed ODP, in particular the flexibility, and the ability to progressively update it without complex processes. They did not discuss any of the issues we have outlined above.
267. Mr Bonis, in his section 42A report preferred the use of a fixed ODP and Mr Compton-Moen, in his urban design evidence for WDC provided a possible ODP for our consideration.
268. Mr Bonis’ final position was set out in his response for WDC to our Minute 2<sup>121</sup> (in which we requested the planning witnesses to caucus after the hearing on matters raised). He set out in some detail why he retains a preference for a detailed ODP to be retained in the district plan. We summarise his key points as follows;
- The Concept Plan sits outside of the Plan, unlike an embedded Outline Development Plan, but is to ensure structuring elements are provided over time.
  - The Proponents have also sought to amend Subdivision Rule 32.1.3. These changes would provide for some key structuring elements (which are to be vested in Council), being roads and reserves, be acquired through subdivision, providing longer term certainty.
  - There would be several key structuring elements (such as lanes, open space, paths and connections) which are equally critical in terms of achieving long

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<sup>121</sup> Bonis, Response to Commissioners’ 2 Minute 2 at paragraphs 4.6 to 4.12

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term coordination and certainty, and would not (necessarily) be acquired through vesting in the Council through subsequent subdivision. These structuring elements would be able to be modified or removed through changes to the Concept Plan.

- We add at this point that the location of the proposed retail main street is another critical key structuring element that would remain uncertain, until actually established.
- Mr Bonis continued by stating the Concept Plan is neither '*a use of land*' for the purpose of s9 of the Act, nor is it defined as 'development' for the application of proposed Rule 31.23.4. Accordingly, it is unclear as to whether the Concept Plan has a statutory purpose as a rule pursuant to s76 of the Act.
- There is uncertainty (for both any subsequent RDL or the Council) in terms of addressing disputes associated with:
  - (a) the provision of information within a Concept Plan;
  - (b) RDL(s) producing multiple or overlapping Concept Plans; or
  - (c) where there are unimplemented resource consents that would not be superseded through amended Concept Plan(s).
- The Concept Plan is not '*an activity*' for the purpose of s95D or s95E (1) of the Act in terms of a determination of a decision as to whether effects are likely to be more than minor, or if a person is an affected person, respectively. This would preclude parties from being able to be notified where changes to the Concept Plan amends future connections.
- There is no requirement in Proposed Rule 31.23.4 Assessment Matters to adhere to, follow or implement any aspect of the Concept Plan. Accordingly, the purpose of the Concept Plan appears to be untethered from an assessment of an individual application.
- He considered that this aspect of the Plan Change does not convey in clear and unambiguous terms the use by which land may be put. The outcome sought, through not seeking to use an orthodox Outline Development Plan as embedded in the District Plan, retains considerable uncertainty, and cannot be stated to be the more effective and efficient in terms of giving effect to the relevant provision of the CRPS.

## Findings

269. We do understand the tendency for ODPs to become outdated, and that the necessity for dealing with this by resource consent applications can become a burden. We think however that this burden could be overstated, given that there would be resource consent applications for most if not all stages of development under the proposed rules.

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270. As these applications would necessitate the review and possible replacement of the concept masterplan and design report, the benefits of this approach over the traditional alternative of resource consents to justify departures from a fixed ODP may be less than hoped for.
271. We think the flexibility and simplicity of process hoped for with the concept masterplan approach is mainly because of the proposed non-notification clause. Were the resource consents amending a concept masterplan to be limited or publicly notified, the process would not be all that different from a plan change process, whether privately requested or council-initiated. The main point of difference would be the further submissions process.
272. The proposed rules provide that the restricted discretionary activity applications would be processed on a non-notified basis. Even if we were inclined to accept the concept masterplan approach, we would have considered it necessary for the notification issues to be considered on a case by case basis. We prefer the evidence of Mr Bonis and conclude that such applications should be subject to the usual processes for determining the extent of notification.
273. The concept masterplan approach is a novel and interesting concept which was attractive at first impression. However, we consider it unworkable for the reasons we have outlined.
274. In the absence of a single, certain and binding concept masterplan or a sufficiently detailed Outline Development Plan, development in the Zone would largely be guided by the new proposed Policy 18.1.1.12 which describes the intended outcomes for the zone.
275. By itself we do not consider that this would sufficiently address the problem referred to above, i.e. the risk that more commercially attractive activities such as business or housing will establish early, leaving insufficient or poorly located space for less commercial activities, such as public open space and community facilities or other key structural elements.
276. We do not regard the Outline Development Plan 158 retained in PC 30, as sufficient for this purpose. It is basic and does little more than identify the location of Ravenswood, the zoning pattern for the area, a partial and mostly existing roading pattern, the existing open space layout, and the NZTA designation for the Woodend Bypass.
277. Overall, and in more colloquial terms, we think the proposed system would amount to a “rolling review” of part of the district plan in a manner not possible under the RMA.
278. In summary we consider that the proposed concept master plan approach would cause the following difficulties, and is therefore unacceptable.
- (a) Uncertainty for those affected by the District Plan, which would lead on to subsequent resource consenting/notification issues for WDC.

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- (b) Uncertainty for us as Commissioners. We should not accept a set of rules that rely on documents that have not been written/prepared at this time
  - (c) It takes only a resource consent to bypass a current Concept Master Plan. This would not be sufficiently secure. A subsequent consent would be under no obligation to even include a Concept Master Plan.

279. There would be issues of ownership and management of a concept master plan, for example, if land the subject of the plan change changes in ownership or control. It would not be certain who owns the master plan. We will return to this matter again in the discussion of the Regional Policy Statement.

## **URBAN DESIGN AND VISUAL LANDSCAPE AND AMENITY ISSUES**

### **The Evidence**

280. RDL has made it very clear that it intends to ensure a very high standard of urban design, and produce a town centre with high visual appeal, good pedestrian connectivity around the centre, a main street with buildings up to the street frontage, parking to the side and rear of buildings, and other features. These intentions are stated in various parts of the PC 30 provisions, including introductory material, objectives, policies and rules, along with their explanations and reasons, and their anticipated environmental results.

### **Findings**

281. We have no reason to doubt the sincerity of these intentions.

282. There are two main ways in which PC 30 is structured to bring these intentions about.

- (a) In the policies, Policy 16.1.1.3 is amended to refer to describe various desirable characteristics including prominent buildings, a main street, good connections between retail spaces and open space, and public urban spaces. A new policy 18.1.1.12 is to ensure, amongst other things,

*an attractive, compact and cohesive town centre with a unique sense of identity and a high quality of design, that is integrated with surrounding land uses and adjoining residential areas and open space;*

The policy goes on to refer to the concept master plan which we have discussed above, which is to guide the development to provide

*i. an identifiable and accessible main street as a focal point for activity in the Ravenswood town centre within a pedestrian focussed environment;*

*ii. high quality, attractive and engaging streetscapes that reinforce the function of streets, enhance amenity and accessibility of the town centre, and maximise integration with building frontages;*

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*iii. open spaces which provide for a range of community functions and interaction and enhance connectivity;*

*iv. marker buildings at suitable locations to support legibility;*

*v. a safe, legible, and highly connected network of well-designed streets, open spaces, and crossing points that provide high levels of access, are responsive to surrounding activities, and include at least one north-south connection between Bob Robertson Drive and the Taranaki Stream corridor*

*vi. provision of a connected network of walkways and cycleways:*

*a. within the Business 1 zone;*

*b. between developments along Bob Robertson Drive;*

*c. linking the Business Zone land to the Taranaki Stream;*

- (b) A new rule 31.25.4 would provide that all development would be a restricted discretionary activity, and includes a long list of urban design matters for which discretion would be restricted. The rule goes on to require all applications to be accompanied by a concept master plan and urban design report.

283. We accept that these are all appropriate and highly desirable urban design characteristics.

284. However, the system to bring all this about is heavily reliant on the proposed concept master plan approach, about which we have already expressed our reservations, to successfully achieve these outcomes. We do not repeat that here, but observe that the whole system seems to be founded on an assumption that all development would be sequential, one stage at a time, all resource consents would be implemented before any further consent was applied for, that the concept masterplan would always be adhered to, and that a current concept master plan would always lapse whenever a new one was prepared.

285. Significantly, the matters for discretion do not include consideration of the extent to which a proposed development would give effect to the master plan and urban design report. Legally, that is correct because the matters for discretion need to be set out in the rules, not in a document which sits outside the plan.

## **TRANSPORT EFFICIENCY ISSUES**

286. Through reading PC 30, the submissions, the section 42A report and the evidence at the hearing we have deduced that there are four main transport issues to be considered. These are:

- (a) Wider transport issues beyond the site;

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- (b) Issues that might arise at the intersection on State Highway 1 which provides access to Ravenswood to the west and, and, through Bob Robertson Drive, will also provide convenient access to Rangiora and other locations further to the west;
  - (c) Design issues within the proposed Ravenswood Centre; and
  - (d) Provision for public transport.
287. Beyond the site submitters were concerned that there could be increased traffic on State Highway 1, and that this could cause safety and efficiency problems, especially in Woodend, where the highway passes through. Neither of the traffic experts who gave evidence, Mr Metherall for RDL or Mr Binder for WDC considered this to be an issue and we accept and adopt their conclusions on this. We note that eventually there may be a Woodend Bypass constructed although this is not yet funded or timetabled.
288. The intersection on State Highway 1 is a 2-lane roundabout. The north and south legs are for the highway, the east leg is Pegasus Boulevard leading to the town of Pegasus, the western leg is Bob Robertson Drive which provides access to the existing commercial premises at Ravenswood, the new and developing residential development of Ravenswood to the east and south, and to the Woodend-Rangiora Rd. We were told that it is likely that this will enable the closure of the existing unsatisfactory intersection of that road with the highway within the Woodend township.
289. A number of submitters, including the Woodend-Sefton Community Board, were concerned that there would be inadequate safe access across the highway for pedestrians and cyclists travelling between Pegasus and the new centre. Some submitters sought crossing facilities such as an underpass, overpass, or traffic lights.
290. Waka Kotahi (the New Zealand Transport Agency) in its submission sought reassurance that the roundabout would be able to operate safely and efficiently as the new centre developed.
291. Within the PC 30 centre, issues included that the proposed centre will be split through the middle by Bob Robertson Drive which will be a wide and busy collector road, so there would be a need for safe midblock crossing points and traffic calming measures.
292. A number of submitters mentioned the need for the development to include a public transport interchange.

### **The Evidence**

293. In his evidence for RDL, Mr Andrew Metherall said that he had carried out further analysis of the State Highway intersection and confirmed that there would continue to be satisfactory and safe access at the roundabout and a good level of service in regard to delays. He said that Waka Kotahi had accepted this in an exchange of correspondence. He mentioned that Waka Kotahi are considering modifying the roundabout to a single lane on each leg.



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294. Using this proposed modification as a worst case scenario, his analysis shows that the SH1 roundabout would be expected to operate efficiently with good levels of service (A or B) for all movements during the morning and evening peak periods in 2028, and the morning peak period in the medium-long term (~2038). This modification is not confirmed, and Mr Metherall was satisfied that the intersection would continue to be safe and efficient whether or not this proceeded. He noted that Waka Kotahi outlined in their further submission that the analysis has satisfied them that the potential effects of the proposed plan change on the state highway will be adequately managed.
  295. With regard to cyclists and pedestrians, Mr Metherall said that Waka Kotahi proposed a modification of the roundabout to a single lane on each leg. This would have the effect of slowing traffic and improving safety for cyclists and pedestrians. He supported this PC 30. It was not clear however from his evidence whether this was a firm intention or just a possibility. He did not conclude the modification would be essential for safety reasons.
  296. With regard to the wider network, and Woodend in particular, Mr Metherall said he understands that Waka Kotahi are planning localised changes on the SH1 corridor within Woodend to improve local access and minimise severance ahead of the Woodend Bypass. He said that, even without the proposed development, traffic volumes are continuing to grow on the highway corridor. He also noted the positive effect on traffic volumes that might arise if local residents did not have to travel as far for their shopping and employment needs.
  297. With regard to roading issues within the centre, he said that future access locations and possible associated road upgrades or mitigation measures can be considered at the resource consent stage. He relied on the concept masterplan approach to resolve these. We have discussed elsewhere our reasons for not accepting this approach, which leaves open how else this roading issue might be managed.
  298. He pointed out the District Plan includes Rule 30.8.2 for sites providing 20 or more car parking spaces which requires Restricted Discretionary assessment of matters including access location and design. It also requires consideration of a range of other matters including parking supply, the parking and traffic environment around the site, utility services, and effects on the function, amenity, and character of town centre activities.
  299. With regard to public transport, he said that Environment Canterbury periodically reviews its bus network for coverage across developing urban areas. If a bus route is to serve Ravenswood in the future, he considered Bob Robertson Drive and/or Garlick Street would be able to accommodate it. It would be desirable to have the area served by public transport for accessibility.
  300. For WDC Mr Binder was concerned that the PC 30 at present lacked detail and certainty regarding cycling and pedestrian circulation within the centre, and does not provide for public transport. He was concerned that the wide collector road Bob Robertson Drive, connecting Rangiora to the State Highway, dissecting the centre would encourage higher

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traffic speeds to the detriment of pedestrians and cyclists. He suggested activation of the road frontage to create side friction and reduce speeds, as well as traffic calming measures. He recommended inclusion of a public transport hub and park and ride facilities.

301. He accepted that the Integrated Transport Assessment prepared by Mr Metherall demonstrates that the wider roading network would continue to have sufficient capacity to handle additional traffic at an acceptable level of service. He noted the proposed modification of the State highway roundabout and was confident that the issue of pedestrians and cyclists crossing the highway there would be dealt with by Waka Kotahi

### **Findings**

302. We accept the advice of the two transport experts that the PC 30 would not create unacceptably adverse effects on either the wider roading network or the State Highway 1 roundabout, and that Waka Kotahi would ensure that safe crossing facilities for pedestrians and cyclists were provided. We consider effects at the roundabout and on the wider network would be acceptable whether or not the Woodend Bypass is constructed, and have not factored the bypass into our conclusions.
303. However, we consider all the internal transport issues including provision for public transport mentioned by Mr Binder remain to be dealt with, and that there is no adequate mechanism in the proposed plan change to ensure that they are.

## **OTHER INFRASTRUCTURE EFFECTS**

### **The Evidence**

304. For RDL, Mr Elliot Duke, a professional civil engineer said that the Ravenswood business area is presently serviced by stormwater, water and sewer infrastructure constructed in 2017 – 2018. He was confident that all these systems were either already adequate to service the proposed development, or could easily be upgraded if future analysis of individual projects required this.
305. For WDC, Mr Kalley Simpson, the Three Waters Manager at WDC, accepted this analysis and said that any future upgrades that might be necessary could be addressed as part of building or subdivision consent applications. He also discussed submission 42 which sought an additional stormwater pump station at the outlet of the Taranaki Stream. He said that although this was originally proposed in the initial stages of the Ravenswood project, enlarged on-site detention systems have subsequently been designed and consented, making this additional pump station unnecessary.

### **Findings**

306. We accept the evidence of Mr Duke and Mr Simpson and conclude that although relatively minor upgrades may be required that these can easily be achieved. Therefore there would be no adverse effects arising from infrastructure.

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## PLANNING INSTRUMENTS

### National Policy Statements and Standards

307. National Policy Statements (NPS's) are an RMA legislative tool whereby central government can prescribe objectives, policies and methods to address matters of national significance. A Council must prepare and change its plan in accordance with a NPS<sup>122</sup> and must give effect to any relevant NPS.<sup>123</sup> There are a number of National Policy Statements in force. The only one which is applicable in this case is the National Policy Statement for Urban Development 2020 (the NPSUD).
308. The National Planning Standards 2019 prescribe many aspects of the structure, format and definitions required in plans and policy statements. We have not referred to these standards because we do not consider it necessary to do so, given our recommendation to reject PC 30.
309. There is no dispute between RDL and WDC that the NPSUD applies to this PC 30, although there is some tension between the witnesses as to the implications for PC 30.
310. The provisions of the NPSUD that we consider relevant are as follows.
311. Objective 1 of the NPSUD is:

*New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.*

312. Well-functioning urban environments are defined in Policy 1. The relevant elements are:

*Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:*

*(a) have or enable a variety of homes that:*

*(i) meet the needs, in terms of type, price, and location, of different households; and ...*

*(b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and*

*(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and*

*(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and*

*(e) support reductions in greenhouse gas emissions; and*

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<sup>122</sup> RMA s74(1))

<sup>123</sup> RMA s75(3)

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*(f) are resilient to the effects of climate change...*

313. We accept that PC 30 would enable some of the elements of a well-functioning urban environment on its own site, provided that the issues around the proposed concept master plan system could be resolved, and provided that public transport is provided.
314. Away from its own site, the retail distribution effects which we anticipate at Rangiora and Kaiapoi would cause those centres to decline in decline in functionality
315. Policy 1(a)(i) requires a variety of housing types and prices. As discussed below under the Regional Policy Statement, the applicant has clearly stated they are not providing for a variety of housing types, but only single dwellings.
316. Policy 1(d) is relevant. PC 30 would provide more commercially zoned land within the District, thereby increasing competition in the land and development markets overall. However, these markets are not uniform, but have sectors and sub-sectors within them. The relevant sectors in this case are of greenfield versus brownfield commercial land and development. The cost structures of greenfield and brownfield development are significantly different, and effectively define two, separate, competing markets. While this was not covered directly in evidence, the comments of Mr Foy about the effects of PC 30 “capturing” the development potential within the District for the next decade or more suggests over-supply of land in one location, and in one ownership, may produce adverse effects on the district-wide market.
317. Objective 2 is
- Planning decisions improve housing affordability by supporting competitive land and development markets.*
318. The loss of an area of Residential 6A land to business development and the failure to provide for intensive residential development in or adjacent to the proposed centre does not improve housing affordability. We acknowledge that this is a relatively minor issue in the wider context and the Council is active in enabling residential development elsewhere in the district including at Woodend, Ravenswood and Pegasus.
319. Objective 6 of the NPSUD is:
- Local authority decisions on urban development that affect urban environments are:*
- (a) integrated with infrastructure planning and funding decisions; and*
- (b) strategic over the medium term and long term; and*
- (c) responsive, particularly in relation to PC 30s that would supply significant development capacity.*
320. We consider PC 30 is consistent with subclauses (a) and (c) but not with subclause (b) because of the retail distribution effects it would create at Rangiora and Kaiapoi.

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321. Objective 8 is:

*New Zealand's urban environments:*

- (a) *support reductions in greenhouse gas emissions; and*
- (b) *are resilient to the current and future effects of climate change*

322. We consider that in the absence of any public transport and the present low use of electric vehicles to bring the anticipated customers from Christchurch, that PC 30 fails to achieve this objective by a wide margin. Both these matters may improve over time but at present we are unable to have any confidence about if or when this will occur. Ravenswood is approximately 20 kilometres from the nearest substantial KAC in Christchurch at Northlands Mall, in the north of the City, meaning that most Christchurch residents making a return trip to shop at Ravenswood would be making a journey of at least 40 km and in most cases more. In our opinion this is a significant shortcoming of PC 30 and reinforces our conclusion that any KAC or Town Centre at Ravenswood should be significantly smaller and rely primarily on its own local catchment.

323. Policy 2 is:

*Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.*

324. We accept that PC 30 would give effect to this objective but add that none of the expert witnesses sought to argue that the scale of PC 30 is necessary to enable the Council to meet its obligations under this policy, or that a smaller centre would not give effect to this policy.

325. Policy 6 is:

*When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters:*

- (a) *the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement*
- (b) *that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes:*
  - (i) *may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and*
  - (ii) *are not, of themselves, an adverse effect*
- (c) *the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1)*

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(d) *any relevant contribution that will be made to meeting the requirements of this National Policy Statement to provide or realise development capacity*

(e) *the likely current and future effects of climate change*

326. With reference to subclause (a) we accept that a KAC at this location would give effect to planned urban development form in the CRPS, but equally a smaller KAC commensurate with the local catchment would also do so. Under (b) we accept that the proposed KAC would bring about significant change, but that would not necessarily have adverse effects on amenities, although we do not consider the proposed Concept Master Plan approach adequate to ensure this. With regard to (c) we do not accept that a KAC of the scale proposed would be consistent with well-functioning urban environments elsewhere in the district, particularly Rangiora and Kaiapoi. Under (d) we accept that PC 30 would contribute to development capacity but is not essential for that purpose. We also consider that the originally planned housing development of the site would equally have done this. With regard to (e) we consider that because of the reliance on the Christchurch market PC 30 will have an adverse effect on climate change because of transport emissions.

### **The Evidence**

327. The planning and economics witnesses agree that PC 30 would help to meet the Council's obligations for supply of for business land on the supply side, as required by Objective 1, Policy 2 and Clause 3.22.

328. However, Mr Bonis in the s42A report qualifies this where he wrote that an oversupply of commercial land has the potential to cause adverse retail distributional effects at the Rangiora and Kaiapoi centres, which may result in them not being able to operate as well-functioning urban environments as required by policy 1. He described this as a "*residual tension*".<sup>124</sup>

### **Findings**

329. We did not hear enough about WDC's approach to providing sufficient business land to satisfy the NPSUD requirements to resolve this tension. However, we observe that once this has been achieved, then the NPSUD cannot be said to encourage or require a supply of business land beyond that point. In fact, both Mr Haines and Mr Browne wrote that "*Notably, the additional Core Retail provision of 27,890m<sup>2</sup> GFA represents only 34% of the District's total 81,650m<sup>2</sup> GFA growth provision (which includes the 15% NPS-UD competitiveness margin projected to the year 2043 by Insight Economics)*".<sup>125</sup>

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<sup>124</sup> Section 66-68 of the s42A report

<sup>125</sup> Cameron Browne Evidence paragraph 21 and David Haines Evidence paragraph 25.

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330. Although it was suggested in opening legal submissions<sup>126</sup>, nothing we heard from any of the witnesses sought to justify the extent of PC 30 as being necessary to give effect to the NPSUD. Mr Bonis went further when he went on to say that, in his opinion;
- “I do not consider the proposition of a limit or threshold on the unrestricted extent of retail activity to be contrary, or not give effect to the NPS-UD.”<sup>127</sup>*
331. With regard to transport emissions and climate change under Objective 8 and Policy 1 of the NPSUD, Mr Bonis drew our attention to it but did not discuss it in any depth, while neither Mr Browne nor Mr Haines discussed it at all in their evidence.
332. We agree that PC 30 would contribute to achieving the NPSUD requirements for the supply of business land on the supply side.
333. We accept however that the NPSUD does not preclude limits to the scale of an individual rezoning PC 30 if appropriate for other reasons such as avoiding significant retail distribution effects.
334. Nothing that we heard suggests that the extent of PC 30 is essential for the Council to achieve its requirements under the NPSUD, for example because there are no other alternatives, and we acknowledge that the RDL was not suggesting this.
335. Further, there is nothing that requires a localised plan change like this one to meet all, or any, of the requirements of the NPSUD for the provision of business land. That is a district-wide issue, and there is no onus on PC 30, or any particular plan change to supply any given amount of the required provision.
336. Nothing we heard suggests that the proposed deletion of residential zoning at Ravenswood would affect WDC’s ability to enable sufficient residential land.
337. Because of our findings about the extent of adverse retail distribution effects likely to result for the existing KAC’s at Rangiora and Kaiapoi, we do not consider PC 30 will contribute to achieving well-functioning urban environments, as required by Objective 1 and Policy 1.
338. With regard to transport emissions and climate change, the evidence, particularly of Mr Colegrave, was that the proposed centre would attract a large proportion of its custom from the “*sub region*”. We take that to mean Greater Christchurch generally. While some of this would be Christchurch residents who had other reason to be in the Waimakariri District, and some of it would be passing traffic on State Highway 1, we think it is reasonable to expect that there would be many customers travelling to Ravenswood primarily to visit this centre.
339. In our opinion establishing a centre that intends to target this market, and in fact will need to do so for its viability, fails to give effect to Objective 8 and Policy 1 of the NPSUD, and is in fact contrary to them because of the extensive travelling that would be

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<sup>126</sup> Opening legal submissions at paragraph 33.

<sup>127</sup> Section 42A report at paragraph 68

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required, with resulting emissions. This may change eventually if large scale adoption of electric vehicles takes place, but the rate and success of such change is unknown at present.

### **The Canterbury Regional Policy Statement (The CRPS)**

340. The plan change must ensure that the district plan continues to give effect to the CRPS.<sup>128</sup>
341. Chapter 6 of the CRPS is entitled “*Recovery and Rebuilding of Greater Christchurch.*” The Introduction to the chapter explains that the chapter focuses on the metropolitan urban area of Greater Christchurch and towns stretching from Lincoln, Prebbleton and Rolleston in the south, to Kaiapoi, Rangiora and Woodend/Pegasus in the north, and includes the rural areas between Rangiora, Rolleston and Lincoln, excluding most of Banks Peninsula except the area from Lyttelton to Diamond Harbour.
342. We noted above that the introduction states that Chapter 6 provides a resource management framework for the recovery of Greater Christchurch, to enable and support earthquake recovery and rebuilding, including restoration and enhancement, for the area through to 2028.
343. We note that many of the provisions will clearly influence the growth and development of Greater Christchurch well beyond 2028 and that the proponents of the PC 30 to the Waimakariri District Plan anticipate that the proposed development will not be complete by then. However, for the present it is necessary to give effect to the objectives and policies contained in the chapter.
344. Below we discuss the objectives policies and other provisions that are relevant to PC 30.

### **Key Activity Centres (KAC's)**

345. Key Activity Centres are given considerable attention throughout Chapter 6. The definition of a KAC is:

*“Key existing and proposed commercial centres identified as focal points for employment, community activities, and the transport network; and which are suitable for more intensive mixed-use development.”<sup>129</sup>*

346. The definition includes a list of 14 existing or proposed KAC's, including “*Woodend/Pegasus*”. An accompanying Map A shows the approximate location of these KAC's. It is a small-scale map and the KAC's are shown as yellow stars. There is a star near the approximate location of Ravenswood, but because of the very small scale it is not possible to be definitive about this. The star is not centred on the PC 30 site, but appears to be at the north end of Woodend. We note that the on-line version of Map

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<sup>128</sup> Section 75(3) of the RMA

<sup>129</sup> CRPS Glossary and Definitions at page 249



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A<sup>130</sup> (presumably the most up-to-date) shows the broad outline of the Ravenswood residential and business greenfield priority areas, without locating the star indicating a KAC in or near the business area. We take Map A to be indicative rather than precise, and the location could equally be in Woodend or Pegasus.

347. Although the list describes all 14 as the existing or proposed KAC's, in fact there is nothing that meets the definition of a KAC presently existing at Woodend-Pegasus or Ravenswood. We acknowledge the potential for such a centre to develop there, and that the PC 30 would assist to enable this. However, the existing Business zoning and existing commercial activity at Ravenswood cannot in our opinion be regarded as an existing KAC for the purposes of the CRPS.
348. We note that nothing in this definition describes the size or scale of a KAC, and that some of the centres on the list are quite small, such as Lincoln, which like Woodend is another small town near the edge of Greater Christchurch and close to the larger town of Rolleston.

### **CRPS Issues**

349. Key Issues in the CRPS are set out in Clause 6.1 and include the following:

Clause 6.1.2 is entitled "*Adverse effects arising from development*". Among its sub clauses is:

*d. The potential to undermine the role and function of the Central City and Key Activity Centres.*

350. Depending on its scale a new or expanding commercial area (whether or not it is to become a KAC) at this site would have the potential to do this, particularly if it created significantly adverse retail distribution effects for the existing KAC's at Rangiora and Kaiapoi. This became one of the principal issues for PC 30 that we have to determine.

### **CRPS Objectives**

351. Objective 6.2.1 is:

*Recovery framework. Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that:*

- 1. identifies priority areas for urban development within Greater Christchurch;*
- 2. identifies Key Activity Centres which provide a focus for high quality, and, where appropriate, mixed-use development that incorporates the principles of good urban design;*
- 3.....*

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<sup>130</sup> See

<https://mapviewer.canterburymaps.govt.nz/?webmap=4078d1c1bd2343c699d74bae75eaa96e&extent=1490305.5759%2C5142313.6377%2C1653345.7573%2C5218827.103%2C2193>

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352. We accept that giving effect to these provisions, i.e. this objective, the definition and Map A requires that a KAC is to be identified in or around the Woodend-Pegasus-Ravenswood nexus. We also accept that the proposed site is suitable to be that KAC. None of the planning or urban design witnesses said otherwise. The Canterbury Regional Council in its submission acknowledged that the location of the KAC is generally consistent with the Canterbury Regional Policy Statement (CRPS, Map A, Chapter 6), while expressing reservations about the scale of the PC 30. The Waimakariri District Council's submission is to the same effect.

353. However, nothing in these provisions prescribes the scale or precise nature of the KAC, other than that it should be of high quality and if appropriate include mixed use development.

354. Objective 6.2.2 is:

*Urban form and settlement pattern*

*The urban form and settlement pattern in Greater Christchurch is managed to provide sufficient land for rebuilding and recovery needs and set a foundation for future growth, with an urban form that achieves consolidation and intensification of urban areas, and avoids unplanned expansion of urban areas, by:*

*....*

*3. providing higher density living environments including mixed use developments and a greater range of housing types, particularly in and around the Central City, in and around Key Activity Centres, and larger neighbourhood centres, and in greenfield priority areas, Future Development Areas and brownfield sites;*

355. A question for us is whether giving effect to this objective would require higher density living environments and mixed use development in and around the Ravenswood KAC, noting that Objective 6.2.1 requires KAC's to incorporate mixed use development where appropriate, and Objective 6.2.2 effectively requires higher density residential development in and around KAC's.

### **The Evidence**

356. Notably Mr Paul Croft, the general manager of RDL, in answers to questions was clear that RDL had no interest in providing higher density housing at Ravenswood. In fact, PC 30 would delete the existing Residential 6A zone which enables, but does not actually require, higher density residential development. Mr Croft said that the low density of residential development that has occurred to date at Ravenswood was highly attractive to purchasers and the uptake of sections for this has been very rapid, with every stage released to date selling out quickly. He said that that RDL had received no approaches from any parties for higher density development. He did not say whether RDL had

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actively considered, investigated or marketed higher density development opportunities.

357. For RDL Mr Browne suggested that the residential component could be provided on upper floors within the Business 1 zones, as apparently occurs already at the Kaiapoi and Rangiora Town Centres. He also discussed the opportunity for comprehensive residential development (defined as being four or more dwellings on the same lot within Residential 1, 2, or 6 zones), which means that the adjoining residential land at Ravenswood, to the west and south of the KAC, is already available for comprehensive residential development.
358. For WDC its urban design witness, Mr Compton-Moen said that the loss of higher density housing proximate to the KAC, would be an adverse consequence of PC30 when compared to the existing ODP. He considered that medium density residential is an important component of successful town centres with residents, especially those within walking distance, providing a '*captive market*' to support local businesses. He said that such residents would also support any community facilities in the centre, and facilities for public transport. In the absence of a walkable local customer base the centre would be almost entirely dependent on transport by car.
359. He estimated the loss of the residential 6A zone could result in the loss of 80-100 households, based on the CRPS definition of medium density in Waimakariri and Selwyn Districts of a minimum of 8-10 households per hectare.<sup>131</sup>
360. As an alternative to retaining the existing Residential 6A zone he suggested providing an area on the western side of the centre where mixed use development including higher density residential could be enabled. This would have the advantage of providing a buffer between the business area and the low density residential zone.
361. He was sceptical of the prospect of much residential development occurring at upper levels in the business area, saying that such mixed use buildings are in his experience difficult to establish and it is difficult to provide a satisfactory level of amenity there.
362. He said that in his experience purely residential terrace or duplex housing is occurring throughout the district with a high level of uptake.

### **Findings**

363. We were not convinced by Mr Croft's evidence that there was little potential demand for higher density residential development at Ravenswood. We consider there was no evidence of systematic market research on this. Like Mr Compton-Moen we are aware of a very high uptake of medium density residential development in greater Christchurch in recent years, including duplexes, apartment blocks and terraces. As an active participant in the planning and consenting of such development, we consider Mr Compton-Moen is well-qualified to comment on this.

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<sup>131</sup> David Compton Moen, Evidence in Chief Clause 3.1

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364. We are also aware from other experience that medium density housing such as apartment blocks or terraces typically achieve far higher densities than 8-10 households per hectare, even if no more than 2 storeys in height, so we consider Mr Compton-Moen's estimate of the potential loss to be on the low side.
365. "*Where appropriate*", as in Objective 6.2.1 is not a particularly high level test and no systematic attempt seems to have been to examine whether it would be appropriate to have medium density housing at Ravenswood. We see no reason why an area of medium density housing could not be provided either within or at the edge of the Business component of the new KAC, while acknowledging that this would of course limit the spatial extent of Business zoning. However, the KAC might well be better for it, for the reasons given by Mr Compton-Moen.
366. We accept the advice of Mr Compton-Moen that upper-level provision for apartments in the Business 1 zone is likely to have limited appeal, and is not an adequate substitute. We acknowledge that there may be a few people who might take up this opportunity. We observed very little of this type of housing in Rangiora, with one new building a notable exception, and none in Kaiapoi.
367. By deleting the Residential 6A zoning at Ravenswood, the proposed plan change seems to us to fail to give effect to these provisions of the CRPS.
368. Objective 6.2.5 seeks:
- Key activity and other centres support and maintain the existing network of centres below as the focal points for commercial, community and service activities during the recovery period:*
1. *The Central City*
  2. *Key Activity Centres*
  3. *Neighbourhood centres.*
- These centres will be high quality, support a diversity of business opportunities including appropriate mixed use development, and incorporate good urban design principles.*
- The development and distribution of commercial activity will avoid significant adverse effects on the function and viability of these centres.*
369. Both Objective 6.2.1 and 6.2.5 include references to "*appropriate mixed use development*" and Objective 6.2.5 refers to a "*diversity of business opportunities*". Above we have discussed mixed use in terms of residential density. However, the "*diversity of business opportunities*" within the KAC brings with it more than just retail activity. It includes commercial, and community activities and appropriate industrial activities. It is notable that the area applied for within the proposed KAC includes only Business 1. zoning, and excludes the consented B2 zone across Bob Robertson Drive.

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## The Evidence

370. The evidence of Mr Colegrave and Mr Foy has been discussed extensively earlier. In summary, the evidence of Mr Colegrave for RDL. RDL was emphatic that the proposed Business 1 zone would not have adverse retail distribution effects on the existing KAC's at Rangiora and Kaiapoi.
371. The evidence of Mr Foy for WDC was less positive, considering that economic effects would be considerably greater than Mr Colegrave estimated at these two centres, and that the Ravenswood centre as proposed would absorb most if not all of the business growth potential in the Waimakariri District in the medium term. As discussed above, we have preferred the evidence of Mr Foy, and found that there would be significant retail distribution effects on Rangiora and Kaiapoi, is approved at the scale proposed.
372. In his supplementary evidence on the granting of a resource consent for a new commercial centre at Waimakariri Junction, near Kaiapoi, Mr Haines said that Ravenswood is an existing KAC and that future growth of retail activity should be "*equitably distributed*" between the three KAC's in the district.
373. We note that this evidence from Mr Haines is inconsistent with the closing submissions for the RDL, where it is specifically acknowledged that it is necessary to determine whether there are likely to be significant retail distribution effects and, if so, consider the most appropriate management of those effect.<sup>132</sup>

## Findings

374. We have discussed and evaluated this evidence elsewhere in this decision. Putting aside for the moment the question of whether Ravenswood is an existing KAC at all, at this point we observe that there is no assumption in the CRPS that all KAC's are necessarily equal, and in fact that is very obvious from the range in sizes of the 14 KAC's. There is nothing in the CRPS to support Mr Haines' presumption of "*equitable distribution*".
375. This point was also mentioned in opening legal submissions, where it is stated that the provisions of the CRPS "*do not support an approach that constrains the development on (sic) KAC Business 1 zone on the basis that there will be some limited trade impact on another*".<sup>133</sup>
376. While we agree limited trade impacts would not be a concern, we consider that in this case the impacts go beyond that into significant retail distribution effects. To suggest that the CRPS does not seek to prevent one KAC from having such effects on another is to read something into Objective 6.2.5 that is simply not there. The objective simply refers to the development and distribution of commercial activity irrespective of where it occurs. In our view, a new or developing KAC is "*... development of commercial activity...*" for the purposes of this Objective.

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<sup>132</sup> Closing submissions paragraph 7

<sup>133</sup> Opening legal submissions at paragraph 33.

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377. We interpret the objective as requiring a new or developing KAC to avoid adverse distributional effects on the existing KAC's in the list, in this case Kaiapoi and Rangiora. As we have discussed above, the proposed centre would not do this.
378. The objective is that commercial development is to avoid these adverse effects on existing centres. This is a particularly directive objective. It applies to all commercial development. A newly developing KAC is not exempt from it. As we have found that there would be adverse distributional effects at Rangiora and Kaiapoi, we consider that PC 30I does not give effect to this CRPS objective.
379. We note that Objective 6.2.5 is expressed to apply during the recovery period, that is until 2028. That means it is currently applicable and we have no way of knowing the extent to which the proposed centre might have developed by then. We also consider that the issue of potential adverse distributional effects would still have to be considered at that time, as it derives from the case law, not just the CRPS.

### **CRPS Policies**

380. Policy 6.3.1 is:

*Development within the Greater Christchurch area*

*In relation to recovery and rebuilding for Greater Christchurch:*

- 1. give effect to the urban form identified in Map A, which identifies the location and extent of urban development that will support recovery, rebuilding and planning for future growth and infrastructure delivery;*
- 2. give effect to the urban form identified in Map A (page 6-27) by identifying the location and extent of the indicated Key Activity Centres;*

### **Findings**

381. This is a strongly worded and directive policy. We consider PC 30 to be generally consistent with sub clause 2 of this policy with regard to location, but not sub clause 1 with regard to extent for the reasons we have given in regard to distribution effects. This would not support recovery and future planning for growth.
382. Policy 6.3.3 is:

*Development in accordance with outline development plans*

*Development in greenfield priority areas or Future Development Areas and rural residential development is to occur in accordance with the provisions set out in an outline development plan or other rules for the area. Subdivision must not proceed ahead of the incorporation of an outline development plan in a district plan.*

*Outline development plans and associated rules will:*

- 1. Be prepared as:*

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- a. a single plan for the whole of the priority area or Future Development Area; or*
    - b. where an integrated plan adopted by the territorial authority exists for the whole of the priority area or Future Development Area and the outline development plan is consistent with the integrated plan, part of that integrated plan; or*
    - c. a single plan for the whole of a rural residential area; and*
  - 2. Be prepared in accordance with the matters set out in Policy 6.3.2;*
  - 3. To the extent relevant show proposed land uses including:*
    - a. Principal through roads, connections with surrounding road networks, relevant infrastructure services and areas for possible future development;*
    - b. Land required for community facilities or schools;*
    - c. Parks and other land for recreation;*
    - d. Land to be used for business activities;*
    - e. The distribution of different residential densities, in accordance with Policy 6.3.7;*
    - f. Land required for stormwater treatment, retention and drainage paths;*
    - g. Land reserved or otherwise set aside from development for environmental, historic heritage, or landscape protection or enhancement;*
    - h. Land reserved or otherwise set aside from development for any other reason, and the reasons for its protection from development;*
    - i. Pedestrian walkways, cycleways and public transport routes both within and adjoining the area to be developed;*
  - 4. Demonstrate how Policy 6.3.7 will be achieved for residential areas within the area that is the subject of the outline development plan, including any staging;*
  - 5. Identify significant cultural, natural or historic heritage features and values, and show how they are to be protected and/or enhanced;*
  - 6. Document the infrastructure required, when it will be required and how it will be funded;*
  - 7. Set out the staging and co-ordination of subdivision and development between landowners;*

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8. *Demonstrate how effective provision is made for a range of transport options including public transport options and integration between transport modes, including pedestrian, cycling, public transport, freight, and private motor vehicles;*
  9. *Show how other potential adverse effects on and/or from nearby existing or designated strategic infrastructure (including requirements for designations, or planned infrastructure) will be avoided, remedied or appropriately mitigated;*
  10. *Show how other potential adverse effects on the environment, including the protection and enhancement of surface and groundwater quality, are to be avoided, remedied or mitigated;*
  11. *Show how the adverse effects associated with natural hazards are to be avoided, remedied or mitigated as appropriate and in accordance with Chapter 11 and any relevant guidelines; and*
  12. *Include any other information that is relevant to an understanding of the development and its proposed zoning.*

### **The Evidence**

383. Based on the evidence of Mr Browne discussed above, we think that RDL seems to have come to a late realisation that PC 30 would not give effect to this policy. On the advice of Mr Munro, at the hearing stage it introduced the concept masterplan approach we have discussed elsewhere<sup>134</sup>, essentially to substitute for a detailed ODP. In doing so, it relies on the “*other rules*” opportunity in the opening clause of this lengthy policy.
384. For WDC, Mr Bonis and Mr Compton-Moen strongly preferred the use of an ODP, as we have discussed elsewhere in this decision.

### **Findings**

385. Ravenswood is a Greenfield Priority Area according to Map A. Under this policy the use of an Outline Development Plan or related rules is mandatory on a rezoning exercise. To do otherwise would be contrary to the CRPS and therefore contrary to Section 75(3) of the RMA which requires us to ensure the district plan gives effect to the higher order CRPS.
386. We have discussed elsewhere the reasons why we do not consider the concept masterplan approach to be an adequate or appropriate mechanism under the “*other rules*” opportunity.
387. That leads us to the ODP which does remain in the plan change, ODP158. As we have discussed elsewhere, this is very basic, containing only the proposed zone boundaries, the proposed KAC boundary, existing reserves and roads, and the NZTA designation for

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<sup>134</sup> See our discussion of concept masterplan issues above



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the Northern Corridor extension. RDL relies on the “*other rules*” option to supplement this, but the proposed Rules (Rule 31.23 4) are in the form of a framework only.

388. We consider that both the proposed ODP158, and Rule 31.23.4 fall short of providing adequately for the long list of matters set out in Clause 3 3 and sub clauses 2-12, of policy 6.3.
389. We note the cross-references to Policy 6.3.2, which we have not discussed separately, and Policy 6.3.7, which we discuss below. Policy 6.3.2 contains general urban design principles, which are probably adequately provided with in the proposed plan change. Policy 6.3.7 deals with residential growth and development and refers to KAC’s. We have discussed this elsewhere and return to it below.
390. For these reasons we have concluded that the proposed plan change fails to give effect to Policy 6.3.3.
391. Policy 6.3.4 Transport effectiveness is:

*Ensure that an efficient and effective transport network that supports business and residential recovery is restored, protected and enhanced so that it maintains and improves movement of people and goods around Greater Christchurch by:*

- 1. avoiding development that will overload strategic freight routes;*
- 2. providing patterns of development that optimise use of existing network capacity and ensuring that, where possible, new building projects support increased uptake of active and public transport, and provide opportunities for modal choice;*
- 3. providing opportunities for travel demand management;*
- 4. requiring integrated transport assessment for substantial developments;*  
*and*
- 5. improving road user safety*

392. We have discussed transport issues elsewhere in this recommendation. For the reasons given there we consider the proposed plan change is largely consistent with this policy and has the potential to give effect to it, particular in regard to the wider roading network, but requires a more detailed and certain mechanism to ensure adequate attention is given to transport-related matters within the proposed KAC.

393. Policy 6.3.6 is:

***Business land***

*To ensure that provision, recovery and rebuilding of business land in Greater Christchurch maximises business retention, attracts investment, and provides for healthy working environments, business activities are to be provided for in a manner which:*

- 
- 1. Promotes the utilisation and redevelopment of existing business land, and provides sufficient additional greenfield priority area land for business land through to 2028 as provided for in Map A;*
  - 2. Recognises demand arising from the relocation of business activities as a result of earthquake damaged land and buildings;*
  - 3. Reinforces the role of the Central City, as the city's primary commercial centre, and that of the Key Activity Centres;*
  - 4. Recognises that new commercial activities are primarily to be directed to the Central City, Key Activity Centres and neighbourhood centres where these activities reflect and support the function and role of those centres; or in circumstances where locating out of centre, will not give rise to significant adverse distributional or urban form effects;*
  - 5. Recognises that new greenfield priority areas for business in Christchurch City are primarily for industrial activities, and that commercial use in these areas is restricted;*
  - 6. Recognises that existing business zones provide for a range of business activities depending on:
    - i. the desired amenity of the business areas and their surrounds; and*
    - ii. the potential for significant distributional or urban form effects on other centres from new commercial activity.**
  - 7. Utilises existing infrastructure availability, capacity and quality;*
  - 8. Ensures reverse sensitivity effects and conflicts between incompatible activities are identified and avoided or mitigated against;*
  - 9. Ensures close proximity to labour supply, major transport hubs and passenger transport networks;*
  - 10. Encourages self-sufficiency of employment and business activities within communities across Greater Christchurch;*
  - 11. Promotes, where appropriate, development of mixed-use opportunities, within Key Activity Centres provided reverse sensitivity issues can be appropriately managed; and*
  - 12. Incorporates good urban design principles appropriate to the context of the development.*

## **Findings**

394. We are in no doubt that a KAC at Ravenswood in the proposed location would be appropriate and capable of giving effect to this policy.

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395. However, we consider that the scale of PC 30 has the potential to be contrary to, or at least inconsistent with, Sub clause 1, by being more than sufficient until 2028, contrary to Sub clause 6 ii by its potential to have adverse distributional effects on other KAC's, and contrary to Sub clause 11 by not promoting appropriate mixed use opportunities.

***Policy 6.3.7 Residential location, yield and intensification***

*In relation to residential development opportunities in Greater Christchurch:*

1. *Subject to Policy 5.3.4, Policy 6.3.5, and Policy 6.3.12, residential greenfield development shall occur in accordance with Map A.*
  2. ....
  3. *Intensification developments and development in greenfield priority areas shall achieve at least the following residential net densities averaged over the whole of an ODP area (except where subject to an existing operative ODP with specific density provisions):*
    - a. 10 household units per hectare in greenfield areas in Selwyn and Waimakariri District;*
    - ...
- 11 Housing affordability is to be addressed by providing sufficient intensification and greenfield priority area land to meet housing demand during the recovery period, enabling brownfield development and providing for a range of lot sizes, densities and appropriate development controls that support more intensive developments such as mixed use developments, apartments, townhouses and terraced housing.*

**Comment**

396. Policy 5.3.4, Policy 6.3.5, and Policy 6.3.12 are to deal with, respectively, papakāinga housing and marae, transport effectiveness and Future Development Areas. The Ravenswood area is not one of these, and so development there is not subject to those provisions.

**Findings**

397. We are unaware, because we did not receive evidence on it, whether or not the remaining Residential 6 zoning at Ravenswood is able to achieve the minimum of 10 households per hectare measured over the whole ODP area, or at least the greenfield component of ODP 158. However, in our experience this would be questionable, once roads, open space and other non-residential components are accounted for. The proposed deletion of the Residential 6A zoning is likely to make it less likely that this policy would be achieved.

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398. As discussed above, there is no provision in or around the PC 30 KAC for the more intensive residential developments that are required to address housing affordability. PC 30 is contrary to CRPS 6.3.7 (11).

### **The Operative District Plan**

399. In considering the existing objectives and policies of the operative District Plan our starting points are;

- (a) The existing provisions of the District Plan do not have primacy over proposed new or amended provisions proposed by PC 30.<sup>135</sup>
- (b) Where changes are proposed to the existing provisions, the changed provisions should be more appropriate than the existing provisions to achieve the purposes of the RMA, and the higher order planning instruments, which are the NPSUD and the CRPS.<sup>136</sup>
- (c) Where existing provisions are not proposed to be changed, new or amended provisions must not be inconsistent with or contrary to those unchanged provisions. The plan must remain internally consistent and continue to be able to be read as a whole.

### **Chapter 3 – Water**

400. Objective 3.4.1 is:

*Public access to and along the rivers of the Waimakariri District is maintained or enhanced.*

### **The Evidence**

401. The evidence from a number of witnesses was that PC 30 incorporates open space and naturalisation along the banks of the Taranaki Stream, which has already been carried out to a high standard in association with the adjacent residential subdivisions and extends along the southern boundary of the proposed Business 1 zoning, All the planning witnesses agreed that this objective would be met.

### **Findings**

402. Objective 3.4.1 would be achieved by PC 30.

### **Chapter 11 – Utilities and Traffic Management**

403 Policy 11.1.1.7 seeks, inter alia,

*to ensure that the design and development of Ravenswood facilitates the provision of an efficient and convenient public passenger transport system; and*

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<sup>135</sup> Section 32(1)(a) of the RMA

<sup>136</sup> Section 32(1)(b) of the RMA

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*to ensure that the urban areas of Ravenswood are developed to promote the opportunity for convenient and safe access between State Highway No. 1 and the Woodend-Rangiora Road; and to ensure that the urban area of Ravenswood is designed to provide safe and convenient pedestrian and vehicle access between Ravenswood and Woodend township, away from the State Highway.*

### **The Evidence**

404. The evidence from the two transport planning experts, Mr Metherrall for RDL and Mr Binder for WDC was that the PC 30 would achieve this policy, noting that the State Highway intersection is managed by Waka Kotahi (NZ Transport Agency), but that the existing layout of the intersection would remain safe and efficient with the proposed development and that proposed, but not yet confirmed, alterations to the intersection would improve safety for pedestrians and cyclists.

### **Findings**

405. We accept the advice of the experts and conclude that this policy would be achieved by PC 30.

### **Chapter 12 – Health and Safety and Wellbeing**

406. Policy 12.1.1.19 is to:

*a) Manage retail activity within Land Use Recovery Plan greenfield priority areas in a way that:*

*b) avoids adverse effects on the viability of Key Activity Centres;*

.....

### **Chapter 15 Urban Environment**

407. Objective 15.1.2 is to:

*Recognise the role of the Key Activity Centres at Rangiora and Kaiapoi as significant concentrations of business activities with key transport, cultural and community infrastructure in a way that:*

*a) strengthens the Business 1 Zones of Rangiora and Kaiapoi as the primary employment and civic destinations;*

*b) identifies the role of local retail centres as providing convenience retail functions appropriate within the zone to which they are located;*

*c) acknowledges the Business 1 Zones of Woodend, North Woodend, Pegasus and Oxford, that provide for a similar range of activities to the Key Activity Centres at a size sufficient to provide for the needs of those communities; and,*

*d) provides for limited retail activities within Business 2 Zones that are supportive of the Key Activity Centres.*

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408. Policy 15.1.2.1 is to:

*Provide for activities within Key Activity Centres in a way that:*

- a) achieves efficient utilisation and redevelopment of sites;*
- b) considers integrated public transport linkages;*
- c) allows for the efficient movement of pedestrians;*
- d) avoids reverse sensitivity effects on existing Key Activity Centre activities; and*
- e) anticipates appropriately located commercial tenancies that fulfil a retail anchor function.*

### **The Evidence**

409. We have discussed above the economic evidence of Mr Colegrave for RDL and Mr Foy for WDC. In summary Mr Colegrave 's opinion is that the effects on the viability of the KAC's and Kaiapoi would be no more than minor, and should be regarded as legitimate business competition. By contrast Mr Foy considered that the effects would be significantly greater and recommended that the proposed centre should be staged to avoid this outcome.

### **Findings**

410. We have concluded above that the scale of PC 30 would cause significant adverse retail distribution effects on the existing KAC's of Rangiora and Kaiapoi. Therefore, PC 30 would fail to give effect to this policy and would be contrary to it. We regard this as a crucial policy for PC 30 and note that it directly implements Policy 6.3.6 of the CRPS which we have discussed above.

411. RDL has recognised the clash with these existing objectives and policies, and has sought to avoid it by simply adding Ravenswood wherever KAC's are mentioned in this set of objectives and policies. We consider this inappropriate. It would fail to prevent the significant retail distribution issues which would arise at Rangiora and Kaiapoi. It would fail to give effect to the similar provisions of the CRPS. We consider these objectives and policies in their present form are more appropriate than the PC30 proposed amendments. The only way such amendments would be appropriate would be if they were coupled with a more limited scale or staging of development.

### **The Waimakariri District Plan Review**

412. After the hearing of PC 30, and during our deliberations, the Waimakariri District Council publicly notified the review of its district plan.

413. We have briefly considered the relevant parts of this review. It states that the Key Activity Centres, as defined in the CRPS, are the Town Centre Zones of Rangiora, Kaiapoi and Oxford. For the life of this District Plan the emerging Woodend Town Centre located

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at North Woodend is expected play a secondary role to the established centres of Rangiora and Kaiapoi.

414. Policy TCZ -1 states that Rangiora and Kaiapoi are the districts principal town centres with established community services and public expenditure, while North Woodend is a new emerging centre that will provide opportunities over time for town centre activities in the Woodend/Pegasus commercial catchment.<sup>137</sup>
415. The majority of the Ravenswood area is proposed to be zoned Industrial General, north of Bob Robertson Drive, and Residential General south of that road. A small area of land is zoned Town Centre, and the balance is identified for open space and stormwater management.
416. There is a proposed Outline Development Plan for North Woodend that provides a level of detail for the layout of the wider Ravenswood Area.
417. Overall, the proposed district plan review appears to be even less favourable than the existing operative district plan for RDL's aspirations for a large Town Centre/KAC serving a sub regional catchment.
418. Because the review is at such an early stage in its process we have given no weight at all to its provisions, and have concentrated on the existing planning instruments being the NPSUD, the CRPS and the operative District Plan.

### **Other Planning Documents and Strategies**

#### ***The Urban Development Strategy 2006 (the UDS)***

419. In 2006 in a collaborative approach the Canterbury Regional Council, the Christchurch City Council, the Waimakariri District Council, the Selwyn District Council, Te Runanga O Ngai Tahu and the New Zealand Transport Agency (NZTA) prepared the UDS to guide the growth and development of the Greater Christchurch Metropolitan Area until 2045. The UDS contained recommended areas for business and residential development. The growth projections on which the UDS was based were significantly changed by the Canterbury Earthquakes of 2011/2012 and the strategy was adapted to provide a basis for earthquake recovery until 2028. The strategy was incorporated into the Canterbury Regional Policy Statement and the district plans of the three territorial Councils through Orders in Council by Central Government, bypassing the standard processes under the Resource Management Act.
420. Ravenswood was recognised as a Greenfields Priority Area (Residential) in the Canterbury Regional Policy Statement and established in the Waimakariri District Plan through plan changes. An indicative location for a KAC was shown on a small-scale Map A in the CRPS in north Woodend, close to but not within the site of the present PC 30, and was also included in a list of KAC's in the definitions section of the CRPS, described as Woodend/Pegasus. There was no indication of the scale of this or any KAC.

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<sup>137</sup> Proposed District Plan Review Part 3 Town Centre Zone.

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### ***Our Space – The Greater Christchurch Settlement Pattern Update 2018***

421. Our Space was an update in 2018 of parts of the UDS, by the UDS partners, now known as the Greater Christchurch Partnership. It reviewed the proposed UDS settlement pattern in the light of the passage of time, current population and growth projections, earthquake recovery and other relevant matters and proposed an expanded settlement pattern out to 2048. This review also met the requirements of the then National Policy Statement for Urban Development Capacity 2016 (the predecessor to current NPSUD 2020) to prepare a medium term growth strategy.
422. Our Space recognises that Rangiora and Kaiapoi will remain the principal towns of the Waimakariri District, with Rangiora recognised as the principal centre<sup>138</sup>. Our Space identifies Future Growth Areas at Rangiora and Kaiapoi. Ravenswood is unaffected by the new plan changes and remains identified as a Greenfields Priority Area identified on Figure 1 of the document.
423. There is frequent discussion of business growth and development, but almost all of this is in very general terms. Table 4 provides an estimate of medium term commercial development capacity until 2028 which ranges from a -10 hectare shortfall to a +10 ha capacity, while the longer term to 2048 is projected as a range of a -15ha shortfall to +0. No specific proposals are made for new commercial growth areas.
424. The development of Our Space was supported by the preparation of the Greater Christchurch Housing and Business Capacity Assessment 2018.
425. The CRPS was amended in 2021 to implement the Future Development Areas, but any changes to district plan provisions to reflect the document will need to be made by way of plan changes or plan reviews. Our brief review of the Waimakariri District Plan Review indicates that the Council has chosen to deal with these issues through its review of the district plan
426. It would be reasonable to conclude that the PC 30 proposal for a large Town Centre/KAC at Ravenswood is not supported by anything in the Our Space document.
427. When considering a plan change, we are required by Section 74(2)(b) of the RMA to have regard to this strategy, but it is not a document which we must give effect to under section 75(3). In fairness, it was not prepared for that purpose.
428. Our overall conclusions on PC 30 are consistent with the general thrust of the Our Space Strategy, but we have not relied on the document in reaching those conclusions.

### ***The Waimakariri District Development Strategy 2018 (The WDDS)***

429. The WDDS is a strategic planning strategy released in 2018 for the development of the Waimakariri District until 2048.

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<sup>138</sup> Our Space page 21



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430. The Executive Summary states that the Waimakariri District is one of the fastest growing districts in New Zealand. It is projected that approximately 15,000 houses may be required to accommodate growth, together with business, infrastructure and public facilities requirements.
431. The WDDS was informed by various community and technical inputs, including the retail assessment prepared by Property Economics Ltd which is referred to earlier in this decision.
432. The WDDS sets out broad directions for growth and development, and is intended to act as a platform to inform decision making within the context of a long-term view. This document forms part of an ongoing process to provide for that growth management, within the Waimakariri and Greater Christchurch context, including through joint work with the key Greater Christchurch Strategic Partners.
433. The WDDS anticipates that additional greenfield residential land and intensification opportunities are needed in the District's main towns of Rangiora, Kaiapoi, Woodend/Pegasus and Oxford, and that up to 17 hectares of additional retail/commercial land may be required in Rangiora/ Kaiapoi over the next 30 years.
434. Section 2.7 Our Economy states that the district is home to more than 6,300 businesses and a large skilled labour force. The construction and utilities sector is the district's biggest employer followed by the professional services sector, and wholesale and retail trade.
435. Key locations for these business activities are the six zoned business areas within the District, principally located in the District's main towns. In total, over 275 hectares of land in the District was said to be zoned for business activity, both commercial and industrial.
436. The growth approach identified provides for continued business activities in identified business areas within existing towns, and potentially new greenfield business zoned land beyond the existing infrastructure supported boundary in Rangiora and south of Kaiapoi if there is demand through to 2048. Providing opportunities for co-located business activities and ancillary support services is expected to attract employment-rich businesses to the established towns and the district more generally. A more distributed growth pattern would not support business co-location and support services to the same extent.
437. Possible locations for new business zoned land are identified in Figures 11, 12, 13 and 14 which correspond to Rangiora, Kaiapoi, Woodend/Pegasus (including Ravenswood) and Oxford. Further work is intended to identify and confirm the actual greenfield locations and extent, together with providing for different types of business activities within existing urban areas. These will be enabled through the District Plan Review.

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438. Comments on the draft strategy supported Ravenswood as the KAC for Woodend-Pegasus, and the WDDS identified that up to 14,000m<sup>2</sup> of additional retail GFA, requiring up to 5 ha of land could be sustained at Woodend-Pegasus, by 2043.
439. Figure 10 identifies very schematically a proposed KAC at Ravenswood of up to 5ha
440. Figure 13 which is a snapshot of Woodend/Pegasus shows a small area of additional commercial land in the vicinity of Garlick St, which appears to correspond to the area zoned Town Centre in the District Plan Review. This is a small portion of PC 30.
441. Overall, the WDDS supports the establishment of a KAC at Ravenswood but provides no encouragement for a KAC of the scale proposed by PC 30. Instead, it proposes a small Town Centre intended to serve the developing town of which is comprised of Woodend, Pegasus and Ravenswood.

### The Evidence

442. Mr Bonis discussed the WDDS in his section 42A report for the Council. He wrote that regard is to be had to the WDDS, which means giving matters genuine attention and thought, and such weight as is considered to be appropriate. He drew our attention to the Environment Court decision in *Mapara Valley Preservation Society Inc v Taupō District Council (A083/07)*, where the Environment Court noted that while the Taupo District Council Growth Strategy (TD2050) strategy was not a statutory document, it:

*"was publicly notified for consultation with the 2006 – 2016 Long Term Council Community Plan using the special consultative procedures under the Local Government Act 2002. We thus find that the Variations should be given **substantial respect and weight** [when making decisions on a resource consent]".[49]*

and

*"Plan Changes 19, 21, 23, 24 and Variation 25 are based on and informed by a comprehensive Growth Management Strategy, the Taupō District 2050 District Growth Management Strategy, document which has been the result of an extensive period of research, consultation and a participatory process under the Local Government Act".*

443. He wrote that the Waimakariri District Development Plan represents a non-RMA planning and consultation outcome with the community. The plan was consulted on, and in his view should accordingly be given substantial respect and weight in terms of the consideration of PC 30.
444. For RDL, its planner Mr Haines was very critical of the WDDS. His opinion was based on his belief that Ravenswood was identified in the CRPS as a KAC. He noted that at page 33 of the WDDS, it is stated that "14,000m<sup>2</sup> of additional retail floor space could be sustainable in a KAC by 2043." He wrote that in his opinion "it was unthinkable that a KAC could be so limited".

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## Findings

445. We agree with Mr Bonis. The circumstances are very similar to the situation in the Mapara Valley decision.
446. We disagree fundamentally with Mr Haines.
447. Firstly, we note that as we have said several times in this decision, Ravenswood is not an existing KAC under the definitions section of the CRPS. That definition includes both existing and proposed KAC's, the location is labelled as Woodend /Pegasus, the yellow star on Map A of the CRPS is not centred over Ravenswood, and at this time there is nothing existing at Ravenswood that could be described as a KAC.
448. At most, we consider Ravenswood may be a proposed KAC. Having said that, we have no problems with the notion of an appropriately-sized KAC at Ravenswood.
449. Secondly, we disagree with Mr Haines on scale. We note that several of the KAC's in the ECAN list are smaller than the 14,000m<sup>2</sup> which he finds so derisory. For example, Spreydon, (Barrington Mall) appears to have about 7-8,000m<sup>2</sup> of retail floor space. In our observation it is a busy centre that appears to be thriving, with large carparks that are often near full. Any vacant shops are consistently filled quickly. Lincoln appears to be even smaller. In our opinion Mr Haines misunderstands what a KAC is in the context of the CRPS and Greater Christchurch.
450. In our opinion, the WDDS is deserving of significant regard. We note however that we would have come to a very similar decision even in the absence of the WDDS, relying simply on the evidence in the case.

## THE WAIMAK JUNCTION CONSENT

451. We closed the hearing on 6 August 2021 and proceeded to consider deliberate and draft this decision. We, unwisely, stated we would endeavour to release our decision by the end of August.
452. On 17 August we were advised by WDC that they had issued a resource consent for the development of Waimak Junction, a retail precinct in Kaiapoi consisting of a supermarket, a department store, LFR tenancies, food and beverage activities and various trade supply tenancies, to a total GFA of 17,776m<sup>2</sup>. Recognising that a development of this scale was relevant to our decision, we invited the parties to:

*"...make what comments they wish to about both the relevance and significance of this additional information."*<sup>139</sup>

453. And, while not wanting to constrain their responses, whether:

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<sup>139</sup> Minute 6, 25 August 2021

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*“... the consent changes anything and if so, what, including reasons... seeking to understand does the existence of the consent in any way alter their assessment and consideration of Ravenswood in either, a positive or a negative way, and if so, provide assessments and supportive reasons.”<sup>140</sup>*

- 454 We now consider how this development impacts our decision.
455. For WDC, Mr Foy stated that he had not included Waimak Junction in his original analysis, as at that stage it had not been consented, and so was not part of the retail environment<sup>141</sup>. In assessing the impact of Waimak Junction, he applied the RDLs store type sales/GFA to estimate the sales of Waimak Junction if completed and operational by 2028 as \$78.3m.<sup>142</sup> Combined with the RDL’s projected Ravenswood sales, this brings the combined new-centre sales (Ravenswood plus Waimak Junction) to an additional \$221m in 2028. This equates to 11.5 years of the growth in district retail spending.
456. Therefore, if both Ravenswood and Waimak Junction were fully developed by 2033, they would need to capture all the district’s growth in retail spending to 2033, and there would be no demand growth available to support any other development in the district.
457. As a result, he considered that either the developments would not be completed in that timeframe, or they will attract sales from existing centres, predominantly Rangiora and Kaiapoi, decreasing sales at those centres.<sup>143</sup> If both centres were fully developed by 2028, and there was no change in the percentage of retail leakage, there would be a 26.2% drop in sales by other retailers in Waimakariri. This would reduce to a drop of 25.4% if the was the forecast 3% reduction in leakage over the intervening years. Of the 25.4% drop, 16.4% would be due to Ravenswood and 9.0% due to Waimak Junction<sup>144</sup>. He considered that this would likely result in:
- Closure of stores in Rangiora and Kaiapoi, with flow on effects of loss of customers visiting the centres;
  - Closure of nonretail businesses in Rangiora and Kaiapoi;
  - A substantial increase in vacant tenancies; and
  - A reduction in private investment in Rangiora and Kaiapoi, likely causing a reduction in maintenance and enhancement of those centres.
  - A substantial reduction in the attractiveness of developing or redeveloping new retail supply elsewhere in the district.
- 458 He considered that there would be *“very limited”* retail development outside Ravenswood and Waimak Junction for the next decade, that this would be a significant

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<sup>140</sup> Minute 7, 1 September 2021 at 1-2

<sup>141</sup> Foy Supplementary Evidence p 5

<sup>142</sup> Foy Supplementary Evidence Fig 3

<sup>143</sup> Foy Supplementary Evidence p5

<sup>144</sup> Foy Supplementary Evidence p6

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opportunity cost to Rangiora and Kaiapoi, and would erode the primacy of the Rangiora town centre.<sup>145</sup>

- 459 Mr Foy concluded that either Ravenswood and Waimak Junction would not both be fully developed by 2033, or if they were fully developed, combined they would have significant effects on Rangiora and Kaiapoi<sup>146</sup>. He considered that now that Waimak Junction was consented, Ravenswood should be limited to no more than 20,000m<sup>2</sup> retail GFA until 2033.
460. From a planning perspective, Mr Bonis was clear that he considered that the Waimak Junction consent was likely to be implemented, and so the consent, and the effects arising from it, form part of the existing environment within which we must make our evaluation of PC 30.<sup>147</sup>
461. Adopting Mr Foy's evidence, and his proposed 20,000m<sup>2</sup> GFA cap on retail activities to 2033, he maintained his view that the proposed Concept Master Plan approach was not the most appropriate mechanism<sup>148</sup>, and was concerned that the proposed land area (13.4ha) may not be efficient or effective in providing for the smaller centre<sup>149</sup>.
462. For RDL, Mr Colegrave considered that there was "*virtually no chance*" that both centres would be fully developed by 2028<sup>150</sup>. He considered that a significantly lower level of sales/GFA, than that used by Mr Foy, was appropriate. He also considered that Waimak Junction would operate in a "*limited local market*", at least initially. He therefore estimated the sales at Waimak Junction at \$58.5m in 2028 (compared to Mr Foy's estimate of \$78m)<sup>151</sup>. Further, he considered that Waimak Junction (like Ravenswood) will have a "*profound*" impact on the District's retail net retention, "*significantly*" increasing the size of the retail supply pie in the District<sup>152</sup>.
463. He considered that the consenting of Waimak Junction was a strong indicator of the District Council's attitude to development outside the two existing KACs<sup>153</sup>. He saw Waimak Junction as setting a "*compelling precedent*" for how we should evaluate PC 30<sup>154</sup>.
464. Mr Colegrave re-ran his model (without Ravenswood) to show the effects of Waimak Junction on the retail sales of the other centres. His modelled results are that Waimak Junction would take only \$6.3m and \$3.9m from the sales of Kaiapoi and Rangiora respectively, with the bulk of the centres sales (\$35m) being drawn from the sales of Christchurch City centres. His results indicate that the advent of Waimak Junction will

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<sup>145</sup> Foy Supplementary Evidence p8

<sup>146</sup> Foy Supplementary Evidence p5

<sup>147</sup> Bonis Supplementary Evidence at 12

<sup>148</sup> Bonis Supplementary Evidence at 23.6

<sup>149</sup> Bonis Supplementary Evidence at 23.11

<sup>150</sup> Colegrave Supplementary Evidence at 28

<sup>151</sup> Colegrave Supplementary Evidence at 16, 17 and Table 2

<sup>152</sup> Colegrave Supplementary Evidence at 34

<sup>153</sup> Colegrave Supplementary Evidence at 7

<sup>154</sup> Colegrave Supplementary Evidence at 11

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increase the total District retail sales by \$38.7m – the increase in the size of the District retail pie<sup>155</sup>.

465. When Ravenswood is included, the cumulative effect is to increase the size of the retail pie by \$111.6m. The cumulative effects on Rangiora and Kaiapoi centre sales are decreases of \$15.3m and \$8.3m respectively, with out of district centres taking the bulk of the decrease at \$112m<sup>156</sup>. Consequently, Mr Colegrave estimates that the trade effects of Waimak Junction on Rangiora and Kaiapoi centre sales will be only -1.6% and -7.7% respectively<sup>157</sup>. Cumulatively with Ravenswood, the effects will be -6.5% and -10.1% respectively<sup>158</sup>. Mr Colegrave states that Ravenswood will not have “any significant adverse retail distribution effects”.
466. From the planning perspective for RDL, Mr Haines maintained his view that the available growth in retail demand within Waimakariri should be equitably shared between the three KACs, with Waimak Junction representing Kaiapoi’s share of that growth, allowing Ravenswood, at 35,500m<sup>2</sup> retail GFA, taking 34% of the growth<sup>159</sup>. However, he was concerned that the Waimak Junction consent “...is contrary to, and unsettles...” the Waimakariri District Plan objectives and policies, the CRPS hierarchy and distribution of KACs, and the Greater Christchurch Settlement Pattern Update (July 2019<sup>160</sup>).
467. Mr Croft and Mr Munro also provided statements about the relevance of the Waimak Junction consent, but beyond the helpful update on progress in marketing Ravenswood residential and commercial areas from Mr Croft, they do not add anything to the positions as summarised above.

### Findings

468. In calculating the effect that Waimak Junction in conjunction with Ravenswood (both fully built out) would have on the sales of other stores in the District in 2028 at 26.2% and 25.4%<sup>161</sup>, it appears that Mr Foy has not allowed for the difference between District demand and sales within the District. He appears to have used District demand in his denominator, without adjustment to leakage (net retention). When we make this adjustment, we get figures of 24.5% and 23.7%, assuming the current level of, and a 3% improvement in, net retention respectively. However, we do not consider these differences to be significant enough to change the thrust of his analysis or conclusions.
469. Mr Foy’s conclusions are in line with our findings above that, at the proposed scale, PC 30 would have significant retail distributional effects on the Rangiora and Kaiapoi KACs, and would be heavily dependent on significant sales to out of district residents, with implications for travel efficiency.

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<sup>155</sup> Colegrave Supplementary Evidence Table 2

<sup>156</sup> Colegrave Supplementary Evidence Table 3

<sup>157</sup> Colegrave Supplementary Evidence Table 2

<sup>158</sup> Colegrave Supplementary Evidence Table 3

<sup>159</sup> Haines Supplementary Evidence at 3 and Table 1

<sup>160</sup> Haines Supplementary Evidence at 7

<sup>161</sup> Foy Supplementary Evidence p4

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470. Mr Colegrave's comments on the precedent effect highlights the ease with which core retail activities are being consented outside the existing KACs under the operative District Plan. This deepens our concern that the proposed retail centre could be significantly larger than that applied for in PC 30. It strongly suggests that the proposed cap at 35,500m<sup>2</sup> GFA could be significantly exceeded by resource consent. Mr Haines stated that LFR in the B2 zones was easily consentable under the operative District Plan<sup>162</sup>.
471. We find that the Waimak Junction consent reinforces our view that the proposed scale is too large, and that a retail centre of a size more in keeping with the local catchment is appropriate for any future Ravenswood KAC.

#### **CODE OF CONDUCT COMPLIANCE**

472. In their responses to Minute 6, Messrs Colegrave<sup>163</sup>, Haines<sup>164</sup> and Croft<sup>165</sup> made comments strongly suggesting that Messrs Foy and Bonis may not have been compliant with the requirements of the Code of Conduct. In Minute 10 we requested Messrs Foy and Bonis to respond to these comments.
473. The Code of Conduct is very clear that all experts giving evidence have an overriding duty to assist the decision maker impartially, and to avoid advocacy for the party engaging them<sup>166</sup>. Having considered the responses of Messrs Foy and Bonis, we are confident that they have been fully compliant with the Code of Conduct. The comments made by Messrs Colegrave, Haines and Croft were, at best, unwarranted, unfortunate and uncalled for.

#### **THE SUBMISSIONS AT THE HEARING**

474. Earlier in our decision we identified the number of submissions received on PC 30 identifying those that support the plan change support it with amendments and those that oppose PC 30.
475. For the sake of completeness we record that Mr Bonis within his section 42A provided detail on those submissions and it is unnecessary for us to here repeat that information. We have taken those submissions and the relief sought by them into account in reaching our decision on PC 30.
476. Appearing before us, Ms Shona Powell, of the Woodend-Sefton Community Board, presented a very clear argument on behalf of the residents of the Woodend-Pegasus-Ravenswood locality for the provision of retail and service facilities at Ravenswood, that there were currently few shops immediately available to the residents, requiring that

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<sup>162</sup> Application Attachment 2, note 4

<sup>163</sup> Colegrave Supplementary Evidence cumulating at 79

<sup>164</sup> Haines Supplementary Evidence at 44, and 47-51

<sup>165</sup> Croft Supplementary Evidence culminating at 24

<sup>166</sup> Environment Court Practise Note at 5.2.1 & 5.2.2

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they travel to Rangiora, or Kaiapoi to shop<sup>167</sup>. She stated that the Board would like to see the Plan Change approved without inflexible or too stringent staging timeframes, that the business centre needs to accommodate the local population growth in a timely and responsive manner. They wanted:

*“... an attractive, shopping centre that ... will serve the local community, the District and the wider region.”<sup>168</sup>*

477. In their written submission, the Community Board gave general support to the Plan change, but sought a staging rule to match the growth in demand. They proposed a policy that included that Rangiora, Kaiapoi and Woodend-Ravenswood-Pegasus

*“...fulfil roles and functions that tie them closely to the rural areas (and) to each other.”*

and that they

*“... provide to a varying extent for the various needs of both their own communities, and those of surrounding rural areas.”<sup>169</sup>*

478. Elsewhere in our decision we have considered the points this particular submitter made to us at the hearing so we will not repeat matters.

## **DECISION**

479. In common with all those involved in the hearing, we accept:-

- (a) That the residents of Ravenswood, Pegasus and Woodend should be able to meet many of their retail requirements in their local area, and they should have a retail node and Key Activity Centre (KAC) in their local area to serve their community;
- (b) That the proposed Ravenswood Commercial Area in the vicinity of the Bob Robertson Drive-Garlick St roundabout is an appropriate location for such a retail node and KAC;
- (c) That Ravenswood is an appropriate location for a Key Activity Centre as defined in the CRPS;
- (d) That locating a new greenfield KAC at Ravenswood would give effect to CRPS Policy 6.3.1 (2) by identifying the location and extent of the Woodend-Pegasus KAC identified on Map A of the CRPS;
- (e) That a KAC is much more than a retail node, and in defining the extent of the KAC provision must be made for the commercial and community services, and community facilities, that are necessary components of a KAC;

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<sup>167</sup> Powell statement to Hearing, p 1

<sup>168</sup> Powell statement to Hearing, p 4

<sup>169</sup> Submission 7



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- (f) That the KAC as proposed, at this location, would be a very attractive retail node. It would meet the high-quality urban design requirements of CRPS Policy 6.3.2;
  - (g) That the PC 30 package could achieve a landscape and visual amenity outcome appropriate to its settings and the proposed B1 and B2 zones;
  - (h) That the traffic likely to be generated by the PC 30 development can be accommodated within the roading network. In addition, we accept that any traffic generated effects would be capable of being managed through detailed design and resource consent processes as needed;
  - (i) That PC 30 does not give rise to infrastructure issues because the site can be readily serviced with key infrastructure already in place;
  - (j) While we accept that PC 30 has the potential to increase the retention of retail spending by Waimakariri residents within the district, we note that this is a redistribution of activity between districts, and is not in itself a factor for consideration under the RMA;
  - (k) What is of relevance under the RMA is the commensurate benefit for transport efficiency and emission reduction that comes with doing more shopping closer to home. Emission reduction is also a key goal of both the NPSUD and the CRPS; and
  - (l) At the scale proposed PC 30 would also increase the inward leakage from outside the district, with corresponding dis-benefit for transport efficiency and emission reduction. While there may still be a net benefit, it will be less than would be obtained by a scale more appropriate to the local market.

480. We consider that there is a considerable degree of uncertainty in the estimates of the trade competition effects of Ravenswood on Rangiora and Kaiapoi. We find that Mr Colegrave's estimates are likely to be the lower limit of the trade competition effects. While we generally accept Mr Foy's estimates, we accept that they also could be on the low side, and the effects may be even larger than he expects.

481. However, we conclude that the proposed scale of retail activity in the new, greenfield Ravenswood retail node would have significant adverse distributional effects on both the Rangiora and Kaiapoi KACs to at least 2038. We have determined these distributional effects being well beyond effects ordinarily associated with trade competition on trade competitors are so significant that, notwithstanding the matters we have accepted that PC 30 will provide, we have nevertheless concluded that the PC30 should be declined.

482. We conclude that approving PC 30 would not accord with or assist Council in carrying out its functions because approving PC 30 would not achieve integrated management of effects of the use, development and protection of land and associated natural and

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physical resources. In particular, we consider the physical resources of Rangiora and Kaiapoi would be at significant risk.

483. In our view approving PC 30 would not be controlling any actual or potential effects of the use, development or protection of land because of our finding in relation to significant adverse distributional effects on both Rangiora and Kaiapoi KACs. In similar fashion we do not consider that approving PC 30 adequately addresses and provides for actual and potential effects on the environment including, in particular, adverse distributional effects as described.
484. While we conclude that we cannot support a re-zoning to Business 1 at the scale applied for, a rezoning that is more proportionate to the needs of the local residents would be appropriate, and could be approved.
485. On the basis of the population forecasts available to us, we consider that retail within the KAC in the order of 18,000-20,000m<sup>2</sup> GFA to 2038 would be appropriate, including some allowance for LFR at a scale appropriate for the area.
486. What we do not know is what that would mean in terms of lines on the planning map defining and providing for zones. If we were going to recommend approval of PC30, we would need evidence to confirm the population forecasts, and the GFA figure, and where GFA would be located on the planning map. However, we were not provided with that evidence.
487. As well, we concluded we did not have the ability to amend the PC30 in such a dramatic way without such amendment being volunteered and supported by the RDL. We also concluded that, based on the submissions, we did not have scope to effectively redraw the plan change on the relevant planning map.
488. With regard to the structure of PC 30, we have concluded that the proposed concept master plan system would be unworkable, and in any case almost certainly impermissible under the RMA. The proposed modification to ODP 158 is not sufficient to fill this gap on its own. We think, if PC 30 was to be approved in a modified form, it would need to contain a more detailed ODP and this would have to go back to RDL and the Council for their input. While there might be scope to do this under the WDC submission, this is not the only reason for declining PC 30, so we have not pursued that.
489. Turning to the statutory documents, we conclude, on the evidence, that the scale of the proposed development is not necessary to fulfil the requirements of the NPSUD to ensure a sufficient supply of business land in the district<sup>170</sup>. It would assist in achieving this, but none of the expert witnesses said that without this scale of development at Ravenswood WDC would be unable to achieve this requirement.
490. Because of its reliance on attracting a large proportion of its customers from the greater Christchurch metropolitan area, PC 30 is contrary to the provisions of the NPSUD which

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<sup>170</sup> See NPSUD Policy 2

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relate to climate change and transport emissions.<sup>171</sup>In our view this is a sufficient reason by itself to decline this application.

491. The health of the existing Rangiora and Kaiapoi KACs is still vulnerable following the Canterbury Earthquake sequence, and the scale proposed by PC 30 would be contrary to CRPS Objective 6.2.5 and Policy 6.3.6 (3) in not supporting, maintaining, and reinforcing Rangiora and Kaiapoi as focal points for commercial, community and service activities through the recovery period.
492. However, enabling retail to whatever scale does not make for a Key Activity Centre. To enable retail at the scale proposed by PC30 outside a KAC would in our view be contrary to the provisions of the CRPS.
493. It seems to be an assumption by the planners and legal counsel for RDL that if a Centre is defined as a Key Activity Centre then it automatically has equal status with other KAC's and is exempt from the requirements of the CRPS and the Operative District Plan to not adversely affect existing KAC's. This was particularly apparent in the supplementary submissions and evidence on the Waimakariri Junction development where the notion of "*equitable distribution*" of growth opportunities amongst KAC's was introduced.
494. We do not accept that assumption. It is not explicitly or even implicitly contained in the relevant provisions. We note that in the list of KAC's in the CRPS<sup>172</sup> there are some which are quite small, e.g. Lincoln and Spreydon. Although KAC's, these centres provide services primarily in their local catchments. If Ravenswood is an existing KAC under the CRPS definition (which we do not accept) then it is currently a very small one, but would have the potential for extensive and rapid growth. If the intention of the CRPS is to protect existing KAC's from adverse distributional effects from lower order centres, then it makes no sense to exclude that protection from the potentially much greater effects that would from a large, new, and developing KAC.
495. We note also that RDL has not proposed to make substantive changes to the existing objectives and policies of the operative district plan, other than one new policy applicable specifically to Ravenswood. It has however proposed to add the words "*and Ravenswood*" to a number of existing provisions that relate to commercial centres and KAC's. In our opinion that would reinforce the assumption that Ravenswood is to have equal status with the other KAC's.
496. RMA s75(3) requires, and the CRPS is clear, that district plans need to include objectives, policies and rules (if any) to give effect to the objectives and policies of the CRPS in respect of Key Activity Centres. The CRPS requires that a KAC should:
- a) *provide for "higher density living environments, including mixed use developments and a greater range of housing types", both within and in the immediate vicinity of a KAC;*

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<sup>171</sup> NPSUP Objective 8 and Policy 2.2. By itself we continue this

<sup>172</sup> See definition of Key Activity in the CRPS

- 
- b) *support the intensification of residential development in the surrounding area;*
  - c) *contain and support a diversity of business opportunities, including mixed use developments; and*
  - d) *should support housing affordability by providing intensification and supporting intensive housing developments, such as apartments, townhouse and terrace housing.*
497. As a new, KAC in a greenfield development area, incorporating these requirements of a KAC into the objectives and policies of the district plan is, we consider, mandatory. It is against the objectives and policies of the District Plan that the resource consent applications for the detail of the development are going to be assessed.
498. Therefore, we conclude these elements must be up front and centre in the objectives and policies of the District Plan, to ensure that any future resource consents granted achieve these key aspects of a new KAC.
499. In our view RDL has very clearly and deliberately taken a minimalist approach to changes to the objectives and policies of the Operative District Plan. It has not proposed any changes to the objectives and policies of the Operative District Plan as required by the CRPS. RDL have made it clear that they have not endeavoured to enable any higher density housing in or around the KAC, and that they have no interest in doing so.
500. RDL did not seek to reflect these issues in the objectives and policies of the ODP, and no submission sought to address the objectives and policies in this manner. Therefore, we do not see that we have any scope to address these necessary components either.
501. With regard to the two recent non-statutory documents Our Space 2018-2048 and the WDDS, we consider they are both deserving of considerable weight. They are supported by technical research and were widely consulted on before being finalised. In that regard they meet the requirements of the Environment Court in the Mapara Valley decision discussed earlier.
502. The recommendation in the WDDS for an additional 14,000m<sup>2</sup> of retail floor space may turn out to be on the low side; but given the uncertainties we have identified we consider it an appropriate starting point and we prefer it to the IE report advanced in support of PC 30.
503. Given our conclusions on significant adverse distribution effects on Rangiora we conclude that the objective included within the Our Space documentation to maintain Rangiora as the primary commercial Centre in the district would not be achieved under PC 30.
504. We conclude that approving PC 30 will not be in accord with the purpose and principles of Part 2 of the RMA as approval will not meet the sustainable purpose of the RMA, in particular because approving PC 30 at the proposed scale of retail activity in the new,

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greenfield Ravenswood retail node would have significant adverse distributional effects on both the Rangiora and Kaiapoi KACs to at least 2038.

505. We further conclude that PC 30 in its current form is not the most appropriate option to achieve the objectives and policies of the NPSUD, the operative regional policy statement and the operative district plan. We accept that it does provide for greater self-sufficiency for the district, it will support the social and economic needs of the growing Woodend-Pegasus-Ravenswood community, it will achieve a landscape and visual amenity outcome appropriate to its setting, it does not give rise to operational or capacity roading issues, and it is served by three waters infrastructure. However, approving PC 30 would not result in the district plan giving effect to the planning instruments, and approving PC 30, given its scale, will result in significant retail distribution effects on Rangiora and Kaiapoi.
506. For all of the above reasons, we must exercise our discretion under clause 29 (4) Schedule 1, and decline PC 30.
507. Submissions on PC 30 are accepted and rejected in accordance with this decision as indicated in the summary table attached as Appendix 1.
508. We recognise that declining PC30 will be disappointing to the residents of the area, as well as to RDL. We take comfort that these matters will be able to be addressed through the processes of the District Plan Review that is currently underway.
509. We recommend that WDC take note of our findings, and take the opportunity of the District Plan Review to give effect to the requirements of a Key Activity Centre in this vicinity. As considerable development has proceeded at Ravenswood since the adoption of Map A in the CRPS (in 2007 under Proposed Change 1 to the former CRPS), Ravenswood would in our view be the most appropriate location for that KAC, albeit at a different scale to that proposed. This should include considering how Ravenswood should sit within the hierarchy of centres within Waimakariri, something that was not in our view adequately or correctly addressed before us. In any event, perhaps this is an issue that is more appropriately considered from the District-wide perspective of a wider Plan review.

**DATED:** 10<sup>th</sup> November 2021



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**Paul Rogers (Chair)**

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*D.L. Mountfort*

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**David Mountfort**

*Ken Fletcher*

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**Kenneth Fletcher**

**Appendix 1**  
**Ravenswood– Plan Change 30**  
**Summary of submissions**

Sub no.	Plan Provision/ Topic	Submitter name	Support / Oppose / Neutral	Point No.	Relief sought	Reasons	Accept/Accept in Part	Reject/Reject in Part
1.	General Seeking amendment	CP Holdings 2018 Ltd	Support with amendments	1.1	<ul style="list-style-type: none"> <li>Expand the areas zoned B1 to include all the land fronting Bob Robertson Drive as per parcels 1, 2 &amp; 3.</li> <li>consideration to applying an alternative zone/s to the current B2 land to allow for uses of a more mixed- use nature than light industrial - such as office, consulting rooms, live/work units, retail/showrooms.</li> </ul>	<ul style="list-style-type: none"> <li>The Proposed Plan Change allows for a logical and required expansion of commercial zoning in this part of the Waimakariri district. Given the location of Ravenswood adjacent State Highway 1 plus the proposed Woodend bypass motorway extension, and its proximity to a large and growing population base there is a clear need for additional retail and commercial space to service the local community and passing traffic.</li> </ul>		Reject
2.	General Support	Gavin Gillson	Support	2.1	Approve the plan change.	<ul style="list-style-type: none"> <li>The plan change will benefit from the roading infrastructure and reduce congestion on the roads.</li> <li>The plan change will identify Ravenswood as a third Key Activity Centre</li> <li>Enable long term (23 years) economic growth</li> <li>Provide an opportunity for new retail/office/community services to establish a presence and existing businesses to set up additional outlets in the district.</li> <li>The plan change will create new jobs opportunities.</li> <li>Reduce retail leakage and allow the community to shop locally.</li> </ul>		Reject
3.	General Support	Sharon and Paul Divall	Support	3.1	Approve the plan change.	<ul style="list-style-type: none"> <li>The plan change will improve and extend retail, business or other facilities to accommodate the growing population of the area.</li> <li>No requirement for more housing.</li> </ul>		Reject
4.	General seeking amendment	John Lamont	Support with amendment	4.1	Approve the plane change with amendment to change Business 2 to Business 1.	<ul style="list-style-type: none"> <li>Provide an opportunity for new retail/office/community services to establish a presence in the marketplace.</li> </ul>		Reject

Sub no.	Plan Provision/ Topic	Submitter name	Support / Oppose / Neutral	Point No.	Relief sought	Reasons	Accept/Accept in Part	Reject/Reject in Part
5.	General Support	Gull New Zealand Limited	Support	5.1	Approve the Plan Change	<ul style="list-style-type: none"> <li>The Plan change will align with the existing development.</li> <li>Create a new commercial hub that will service fast growing areas such as Ravenswood, Pegasus and Woodend.</li> <li>The plan change will benefit from the roading infrastructure and reduce congestion on the roads.</li> <li>The plan change will identify Ravenswood as a third Key Activity Centre.</li> </ul>		Reject
6.	General seeking amendment	Jedd Pearce	Oppose	6.1	Reduce the total area of land GFA has proposed under this Plan Change	<ul style="list-style-type: none"> <li>The Proposal to rezone land to business to the same size of the current Kaiapoi Activity Centre</li> <li>The existing business zones in Ravenswood, Woodend and Pegasus are not thriving therefore, there is no demand for new business zone land.</li> </ul>	Accept	
7.	General Support	Woodend-Sefton Community Board	Support	7.1	•	•		Reject
8.	General Support	Weston	Support	8.1	Approve the plan change.	<ul style="list-style-type: none"> <li>The plan change will benefit from the roading infrastructure and reduce congestion on the roads.</li> <li>The plan change will identify Ravenswood as a third Key Activity Centre</li> <li>Enable long term (23 years) economic growth</li> <li>Provide an opportunity for new retail/office/community services to establish a presence and existing businesses to set up additional outlets in the district.</li> <li>The plan change will create new jobs opportunities.</li> <li>Reduce retail leakage and allow the community to shop locally</li> <li>Increase the value of residential and commercial properties in the local area.</li> </ul>		Reject



Sub no.	Plan Provision/ Topic	Submitter name	Support / Oppose / Neutral	Point No.	Relief sought	Reasons	Accept/Accept in Part	Reject/Reject in Part
9.	General Support	Fordbaker	Support	9.1	Approve the plan change.	<ul style="list-style-type: none"> <li>The plan change will benefit from the roading infrastructure and reduce congestion on the roads.</li> <li>The plan change will identify Ravenswood as a third Key Activity Centre</li> <li>Enable long term (23 years) economic growth</li> <li>Provide an opportunity for new retail/office/community services to establish a presence and existing businesses to set up additional outlets in the district.</li> <li>The plan change will create new jobs opportunities.</li> <li>Reduce retail leakage and allow the community to shop locally</li> <li>Likely assist with uplifting the value of residential and commercial properties in the local area.</li> </ul>		Reject
10.	General Support	Ahmed Almkhtar	Support	10.1	Approve the plan change.	<ul style="list-style-type: none"> <li>N/A</li> </ul>		Reject
11.	General Support	Bill Kingston	Support	11.1	Approve the plan change.	<ul style="list-style-type: none"> <li>The plan change will ease congestion in existing towns of Rangiora and Kaiapoi.</li> <li>The plan change reduce the need for residents to travel to Christchurch.</li> <li>The plan change will enable new business to be established in the area and provide employment to North Canterbury.</li> </ul>		Reject
12.	General Support	305 Limited	Support	12.1	Approve the plan change.	<ul style="list-style-type: none"> <li>The plan change will benefit from the roading infrastructure and reduce congestion on the roads.</li> <li>The plan change will identify Ravenswood as a third Key Activity Centre</li> <li>Enable long term (23 years) economic growth</li> <li>Provide an opportunity for new retail/office/community services to establish a presence and existing businesses to set up additional outlets in the district.</li> <li>The plan change will create new job opportunities.</li> </ul>		Reject

Sub no.	Plan Provision/ Topic	Submitter name	Support / Oppose / Neutral	Point No.	Relief sought	Reasons	Accept/Accept in Part	Reject/Reject in Part
						<ul style="list-style-type: none"> <li>Reduce retail leakage and allow the community to shop locally</li> </ul>		
13.	General Support	Freedom Group Holdings Ltd	Support	13.1	Approve the plan change.	<ul style="list-style-type: none"> <li>N/A</li> </ul>		Reject
14.	General Support	Kansapat Kaewmuagfah	Support	14.1	Approve the plan change.	<ul style="list-style-type: none"> <li>The plan change will support the continuation of the retail development at Ravenswood and enable the development of a modern regional town.</li> <li>The continued development will create new jobs for people living in the Ravenswood.</li> <li>The plan change will reduce the need for people to commute to Christchurch which will reduce greenhouse gases and carbon emissions</li> </ul>		Reject
15.	General Support	Simon Megget	Support	15.1	Approve the plan change.	<ul style="list-style-type: none"> <li>The plan change will benefit from the roading infrastructure and reduce congestion on the roads.</li> <li>The plan change will identify Ravenswood as a third Key Activity Centre</li> <li>Enable long term (23 years) economic growth</li> <li>Provide an opportunity for new retail/office/community services to establish a presence and existing businesses to set up additional outlets in the district.</li> <li>The plan change will create new job opportunities.</li> <li>Reduce retail leakage and allow the community to shop locally</li> <li>Likely assist with uplifting the value of residential and commercial properties in the local area.</li> </ul>		Reject

Sub no.	Plan Provision/ Topic	Submitter name	Support / Oppose / Neutral	Point No.	Relief sought	Reasons	Accept/Accept in Part	Reject/Reject in Part
16.	General Support	Ben Friedlander	Support	16.1	Approve the plan change.	<ul style="list-style-type: none"> <li>• The plan change will benefit from the roading infrastructure and reduce congestion on the roads.</li> <li>• The plan change will identify Ravenswood as a third Key Activity Centre</li> <li>• Enable long term (23 years) economic growth</li> <li>• Provide an opportunity for new retail/office/community services to establish a presence and existing businesses to set up additional outlets in the district.</li> <li>• The plan change will create new job opportunities.</li> <li>• Reduce retail leakage and allow the community to shop locally</li> <li>• Likely assist with uplifting the value of residential and commercial properties in the local area.</li> </ul>		Reject
17.	General Support	Parash Sarmar	Support	17.1	Approve the plan change.	<ul style="list-style-type: none"> <li>• The plan change will benefit from the roading infrastructure and reduce congestion on the roads.</li> <li>• The plan change will identify Ravenswood as a third Key Activity Centre</li> <li>• Enable long term (23 years) economic growth</li> <li>• Provide an opportunity for new retail/office/community services to establish a presence and existing businesses to set up additional outlets in the district.</li> <li>• The plan change will create new job opportunities.</li> <li>• Reduce retail leakage and allow the community to shop locally</li> <li>• Likely assist with uplifting the value of residential and commercial properties in the local area.</li> </ul>		Reject
18.	General Support	Ross Jennings	Support	18.1	Approve the plan change.	<ul style="list-style-type: none"> <li>• The plan change will benefit from the roading infrastructure and reduce congestion on the roads.</li> <li>• The plan change will identify Ravenswood as a third Key Activity Centre.</li> <li>• Enable long term (23 years) economic growth.</li> <li>• Provide an opportunity for new retail/office/community services to establish</li> </ul>		Reject

Sub no.	Plan Provision/ Topic	Submitter name	Support / Oppose / Neutral	Point No.	Relief sought	Reasons	Accept/Accept in Part	Reject/Reject in Part
						<p>a presence and existing businesses to set up additional outlets in the district.</p> <ul style="list-style-type: none"> <li>• The plan change will create new job opportunities.</li> <li>• Reduce retail leakage and allow the community to shop locally.</li> <li>• Likely assist with uplifting the value of residential and commercial properties in the local area.</li> </ul>		
19.	General Support	Kai Zhou	Support	19.1	Approve the plan change.	<ul style="list-style-type: none"> <li>• The plan change will benefit from the roading infrastructure and reduce congestion on the roads.</li> <li>• The plan change will identify Ravenswood as a third Key Activity Centre</li> <li>• Enable long term (23 years) economic growth</li> <li>• Provide an opportunity for new retail/office/community services to establish a presence and existing businesses to set up additional outlets in the district.</li> <li>• The plan change will create new jobs opportunities.</li> <li>• Reduce retail leakage and allow the community to shop locally.</li> <li>• Likely assist with uplifting the value of residential and commercial properties in the local area.</li> </ul>		Reject
20.	General Support	Dave Bowman	Support	20.1	Approve the plan change.	<ul style="list-style-type: none"> <li>• The plan change will benefit from the roading infrastructure and reduce congestion on the roads.</li> <li>• The plan change will identify Ravenswood as a third Key Activity Centre.</li> <li>• Enable long term (23 years) economic growth.</li> <li>• Provide an opportunity for new retail/office/community services to establish a presence and existing businesses to set up additional outlets in the district.</li> <li>• The plan change will create new job opportunities.</li> <li>• Reduce retail leakage and allow the community to shop locally.</li> </ul>		Reject

Sub no.	Plan Provision/ Topic	Submitter name	Support / Oppose / Neutral	Point No.	Relief sought	Reasons	Accept/Accept in Part	Reject/Reject in Part
21.	General Support	Darpan Patel	Support	21.1	Approve the plan change.	<ul style="list-style-type: none"> <li>The plan change will benefit from the roading infrastructure and reduce congestion on the roads.</li> <li>The plan change will identify Ravenswood as a third Key Activity Centre</li> <li>Enable long term (23 years) economic growth</li> <li>Provide an opportunity for new retail/office/community services to establish a presence and existing businesses to set up additional outlets in the district.</li> <li>The plan change will create new job opportunities.</li> <li>Reduce retail leakage and allow the community to shop locally.</li> </ul>		Reject
22.	General Support	Mark Sellars	Support	22.1	Approve the plan change.	<ul style="list-style-type: none"> <li>The plan change will benefit from the roading infrastructure and reduce congestion on the roads.</li> <li>The plan change will identify Ravenswood as a third Key Activity Centre.</li> <li>Enable long term (23 years) economic growth.</li> <li>Provide an opportunity for new retail/office/community services to establish a presence and existing businesses to set up additional outlets in the district.</li> <li>The plan change will create new job opportunities.</li> <li>Reduce retail leakage and allow the community to shop locally.</li> </ul>		Reject
23.		Waka Kotahi NZ Transport Agency	Neutral	23.1	•	•	Accept	
24.	General Support	Paul Taggart	Support	24.1	Approve the plan change.	<ul style="list-style-type: none"> <li>The plan change will create a new commercial hub which will service the local community and the grater Waimakariri District.</li> <li>The plan change will benefit from the roading infrastructure and reduce congestion on the roads.</li> </ul>		Reject

Sub no.	Plan Provision/ Topic	Submitter name	Support / Oppose / Neutral	Point No.	Relief sought	Reasons	Accept/Accept in Part	Reject/Reject in Part
						<ul style="list-style-type: none"> <li>• The plan change will identify Ravenswood as a third Key Activity Centre.</li> <li>• Enable long term (23 years) economic growth.</li> <li>• Provide an opportunity for new retail/office/community services to establish a presence and existing businesses to set up additional outlets in the district.</li> <li>• The plan change will create new job opportunities.</li> <li>• Reduce retail leakage and allow the community to shop locally.</li> </ul>		
25.	General Support	Adarsh Patel	Support	25.1	Approve the plan change.	<ul style="list-style-type: none"> <li>• The plan change will benefit from the roading infrastructure and reduce congestion on the roads.</li> <li>• The plan change will identify Ravenswood as a third Key Activity Centre</li> <li>• Enable long term (23 years) economic growth</li> <li>• Provide an opportunity for new retail/office/community services to establish a presence and existing businesses to set up additional outlets in the district.</li> <li>• The plan change will create new job opportunities.</li> <li>• Reduce retail leakage and allow the community to shop locally</li> </ul>		Reject
26.	General Support	Shane Hausler	Support	26.1	Approve the plan change.	<ul style="list-style-type: none"> <li>• The plan change will create a new commercial hub which will service the local community and the grater Waimakariri District.</li> <li>• The plan change will benefit from the roading infrastructure and reduce congestion on the roads.</li> <li>• The plan change will identify Ravenswood as a third Key Activity Centre.</li> <li>• Enable long term (23 years) economic growth.</li> <li>• Provide an opportunity for new retail/office/community services to establish a presence and existing businesses to set up additional outlets in the district.</li> </ul>		Reject

Sub no.	Plan Provision/ Topic	Submitter name	Support / Oppose / Neutral	Point No.	Relief sought	Reasons	Accept/Accept in Part	Reject/Reject in Part
						<ul style="list-style-type: none"> <li>The plan change will create new job opportunities.</li> <li>Reduce retail leakage and allow the community to shop locally.</li> </ul>		
27.	Separation of Pegasus from Ravenswood	Templeton Pegasus Limited	Support with amendments	27.1	To separate Pegasus out of any reference to Ravenswood.	<ul style="list-style-type: none"> <li>Creates uncertainty about whether Pegasus is consider to be separate from or part of Ravenswood</li> <li>Potential affect plan provisions relevant to Pegasus or the future development of land within Pegasus.</li> </ul>		Reject
28.	General Support	Warwick Elliot and Elizabeth Duke	Support	28.1	Approve the plan change.	<ul style="list-style-type: none"> <li>The plan change will create a new commercial hub which will service the local community and the grater Waimakariri District.</li> <li>The plan change will benefit from the roading infrastructure and reduce congestion on the roads.</li> <li>The plan change will identify Ravenswood as a third Key Activity Centre</li> <li>Enable long term (23 years) economic growth.</li> <li>Provide an opportunity for new retail/office/community services to establish a presence and existing businesses to set up additional outlets in the district.</li> <li>The plan change will create new job opportunities.</li> <li>Reduce retail leakage and allow the community to shop locally.</li> </ul>		Reject
29.	General Support	Murray Frost	Support	29.1	Approve the plan change.	<ul style="list-style-type: none"> <li>The plan change will create a new commercial hub which will service the local community and the grater Waimakariri District.</li> <li>The plan change will benefit from the roading infrastructure and reduce congestion on the roads.</li> <li>The plan change will identify Ravenswood as a third Key Activity Centre</li> <li>Enable long term (23 years) economic growth.</li> </ul>		Reject

Sub no.	Plan Provision/ Topic	Submitter name	Support / Oppose / Neutral	Point No.	Relief sought	Reasons	Accept/Accept in Part	Reject/Reject in Part
						<ul style="list-style-type: none"> <li>• Provide an opportunity for new retail/office/community services to establish a presence and existing businesses to set up additional outlets in the district.</li> <li>• The plan change will create new job opportunities.</li> <li>• Reduce retail leakage and allow the community to shop locally.</li> </ul>		
30.	Scale of the Proposed Key Activity Centre	Waimakariri District Council	Oppose in part.	30.1	The scale of the Business 1 zoning is reconciled with that identified in the Waimakariri 2048: District Development Strategy. Consequential amendments are required to the ODP (158), zoning maps and district plan provisions to facilitate Residential 6 zoned land for the balance of the area.	<ul style="list-style-type: none"> <li>• There is divergence between the Plan Change and Waimakariri 2048 in terms of the scale of the centre is 12.8ha, with the latter proposing a scale of centre at 5ha.</li> <li>• Economic Report supporting the Plan Change has a focus on quantifying the trade impacts on the existing Waimakariri District Centre hierarchy, but does not fully consider the opportunity costs to the established centres of Rangiora or Kaiapoi, through their growth being reduced as their proximate household expenditure is diverted to the new Ravenswood KAC.</li> <li>• The Plan Change request is not clear as to the function, density, design of what is proposed and consequential sustainable land requirements to facilitate the KAC</li> </ul>		Reject
30	Staging and Sequencing	Waimakariri District Council	Oppose in part	30.2	<p>Justify the proposal to include staging and sequencing of commercial development in Ravenswood and consider limiting development to a suitable amount of gross retail floor space as identified in the Council's District Development Strategy or evidence provided for Plan Change 30.</p> <p>For example: Under Chapter 31, Health, Safety and Wellbeing Rules, new Rule 31.26.3 could be drafted as follows:</p> <p><b><u>31.26.3 Within the Ravenswood Business 1 zoned identified on District Plan Map 158 within the KAC Boundary the total amount of floorspace for retail activity shall not exceed 14,000m2(GFA).</u></b></p>	<ul style="list-style-type: none"> <li>•</li> </ul>		Reject



Sub no.	Plan Provision/ Topic	Submitter name	Support / Oppose / Neutral	Point No.	Relief sought	Reasons	Accept/Accept in Part	Reject/Reject in Part
30	Outline Development Plan and Provisions	Waimakariri District Council		30.3	<p>(a) Amend Ravenswood ODP to provide identifying and ensuring assessment of the provision (or otherwise) of indicative and fixed development requirements as appropriate, including (but not limited to):</p> <ul style="list-style-type: none"> <li>• Provision of an accessible and integrated transport interchange;</li> <li>• Future access points, and an indicative internal road network / main street (specifically as associated with Lot 203);</li> <li>• Activation and connection to Taranaki Stream;</li> <li>• Amenity and setback expectations for any proposed gateway (presumably between Lot 203 and Lot 2) and Garlick Street) to implement Policy 18.1.1.112(a);</li> <li>• Purpose, imposition and role of open space (the 5,984m<sup>2</sup>) proposed.</li> <li>• Narrative as development requirements to achieve the above (and provide associated flexibility).</li> <li>• Appropriate labelling of the ODP, retaining the name "North Woodend ODP".</li> </ul> <p>(b) Insert within with the proposed amendments to Chapter 31, Health, Safety and Wellbeing Rules, add Rule 31.23.4 [renumbered as 21.25.4]:</p> <p><b><u>i) the extent to which development is in general accordance with the outlined development plan, and development requirements, in Appendix 158.</u></b></p> <ul style="list-style-type: none"> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• Greater clarity is required within the ODP as to the extent by which development will be structured to give effect to CRPS Objective 6.2.1 and Objective 6.2.5, inserted Policy 18.1.1.12, and the implementation of the outcomes expressed in the accompanying Rough and Milne Assessment in terms of the imposition of a more detailed ODP both through the land use and subdivision consenting regimes.</li> </ul>		Reject

Sub no.	Plan Provision/ Topic	Submitter name	Support / Oppose / Neutral	Point No.	Relief sought	Reasons	Accept/Accept in Part	Reject/Reject in Part
30	Provisions, including status of subdivision, staging and deferment.				<p>(a) Amend Policy 18.1.1.12 to provide a focused and active suite of concise provisions as to the principles to be achieved through implementation, including but not limited to:</p> <p>a. Staging and sequencing (refer submissions 1 and 2);</p> <p>b. Role and function;</p> <p>c. Transport connection, accessibility and orientation;</p> <p>d. Amenity and urban design.</p> <p>(b) Remove justification for the Plan Change as included in:</p> <p>a. the explanation for Policy 18.1.1.12;</p> <p>b. Principle reasons 18.1.2.</p> <p>(c) Delete the proposed amendments to Chapter 31, Health, Safety and Wellbeing Rules, add Rule 31.23.4 which seeks to limit notification, as follows:</p> <p><del>An application for a resource consent under Rule 31.23.4 shall be considered without the need to obtain the written approval of affected persons in accordance with Section 95 of the Resource Management Act 1991 and shall be processed without notification.</del></p> <p>References to Ravenswood deleted, KAC named "Woodend/Pegasus"</p>	<ul style="list-style-type: none"> <li>proposed a complex set of Plan provisions, which would be improved in terms of legibility and clarity.</li> </ul>	Accept	
31.	General Support	Rangiora Baptist Church	Support	31.1	Approve plan change	<ul style="list-style-type: none"> <li>The plan change will benefit from the roading infrastructure and reduce congestion on the roads.</li> <li>The plan change will identify Ravenswood as a third Key Activity Centre</li> <li>Enable long term (23 years) economic growth</li> <li>Provide an opportunity for new retail/office/community services to establish</li> </ul>		Reject

Sub no.	Plan Provision/ Topic	Submitter name	Support / Oppose / Neutral	Point No.	Relief sought	Reasons	Accept/Accept in Part	Reject/Reject in Part
						<p>a presence and existing businesses to set up additional outlets in the district.</p> <ul style="list-style-type: none"> <li>• The plan change will create new job opportunities.</li> <li>• Reduce retail leakage and allow the community to shop locally.</li> </ul>		
32.	Section 32 Evaluation Report	Canterbury Regional Council		32.1	<ul style="list-style-type: none"> <li>• test through the hearing process the section 32 analysis and the economic analysis provided by the applicant, and give careful consideration to the likely economic and retail distribution effects and whether and to what extent the scale of the proposed KAC could undermine the existing network of centres and in particular adversely affect the function and viability of Rangiora and Kaiapoi as existing Key Activity Centres.</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>	Accept in Part	
33.	General Support	Jerome O'Sullivan	Support	33.1	Approve the plan change.	<ul style="list-style-type: none"> <li>• The plan change will benefit from the roading infrastructure and reduce congestion on the roads.</li> <li>• The plan change will identify Ravenswood as a third Key Activity Centre</li> <li>• Enable long term (23 years) economic growth</li> <li>• Provide an opportunity for new retail/office/community services to establish a presence and existing businesses to set up additional outlets in the district.</li> <li>• The plan change will create new job opportunities.</li> <li>• Reduce retail leakage and allow the community to shop locally.</li> </ul>		Reject
34.	General Support	Patrick Waser	Support	34.1	Approve the plan change.	<ul style="list-style-type: none"> <li>• The plan change will benefit from the roading infrastructure and reduce congestion on the roads.</li> <li>• The plan change will identify Ravenswood as a third Key Activity Centre</li> <li>• Enable long term (23 years) economic growth</li> <li>• Provide an opportunity for new retail/office/community services to establish a presence and existing businesses to set up additional outlets in the district.</li> <li>• The plan change will create new job opportunities.</li> </ul>		Reject

Sub no.	Plan Provision/ Topic	Submitter name	Support / Oppose / Neutral	Point No.	Relief sought	Reasons	Accept/Accept in Part	Reject/Reject in Part
						<ul style="list-style-type: none"> <li>Reduce retail leakage and allow the community to shop locally.</li> </ul>		
35.	General Support	Stephanie Davey	Support	35.1	Approve the plan change.	<ul style="list-style-type: none"> <li>The plan change will benefit from the roading infrastructure and reduce congestion on the roads.</li> <li>The plan change will identify Ravenswood as a third Key Activity Centre</li> <li>Enable long term (23 years) economic growth</li> <li>Provide an opportunity for new retail/office/community services to establish a presence and existing businesses to set up additional outlets in the district.</li> <li>The plan change will create new job opportunities.</li> <li>Reduce retail leakage and allow the community to shop locally.</li> </ul>		Reject
36.	General Support	Paul Lloyd	Support	36.1	Approve the plan change.	<ul style="list-style-type: none"> <li>The plan change will benefit from the roading infrastructure and reduce congestion on the roads.</li> <li>The plan change will identify Ravenswood as a third Key Activity Centre</li> <li>Enable long term (23 years) economic growth</li> <li>Provide an opportunity for new retail/office/community services to establish a presence and existing businesses to set up additional outlets in the district.</li> <li>The plan change will create new job opportunities.</li> <li>Reduce retail leakage and allow the community to shop locally.</li> </ul>		Reject
37.	General Support	Mark Tammett	Support	37.1	Approve the plan change.	<ul style="list-style-type: none"> <li>The plan change will utilise existing roads and planned one for the future.</li> <li>Enable long term economic growth.</li> <li>The plan change will identify Ravenswood as a third Key Activity Centre</li> <li>Provide an opportunity for new retail/office/community services to establish</li> </ul>		Reject

Sub no.	Plan Provision/ Topic	Submitter name	Support / Oppose / Neutral	Point No.	Relief sought	Reasons	Accept/Accept in Part	Reject/Reject in Part
						<p>a presence and existing businesses to set up additional outlets in the district.</p> <ul style="list-style-type: none"> <li>The plan change will create new job opportunities.</li> </ul>		
38.	General Support	Julia Croft	Support	38.1	Approve the plan change.	<ul style="list-style-type: none"> <li>The plan change will provide opportunity for new businesses to establish as well as existing to set up in the district.</li> <li>The plan change will create new job opportunities.</li> </ul>		Reject
39.	General Support	Hetty Van Hale	Support	39.1	Approve the plan change	<ul style="list-style-type: none"> <li>The plan change will create new job opportunities.</li> <li>Reduce retail leakage and allow the community to shop locally.</li> <li>The plan change will benefit from the roading infrastructure and reduce congestion on the roads.</li> </ul>		Reject
40.	General Support	Neil Christopher Macdonald	Support	40.1	Approve the plan change.	<ul style="list-style-type: none"> <li>The plan change attract new business ventures to the area.</li> <li>The plan change will create new job opportunities.</li> <li>Assist with uplifting the value of property in the area.</li> </ul>		Reject
41.	General Support	Des Wai	Support	41.1	Approve the plan change.	<ul style="list-style-type: none"> <li>N/A</li> </ul>		Reject
42.	General Opposition	Jo Kane	Oppose	42.1	<ul style="list-style-type: none"> <li>Oppose the plan change.</li> <li>If the plan change is approve a pump station shall be provided for the Taranaki Flood gate.</li> </ul>	<ul style="list-style-type: none"> <li></li> </ul>	Accept	

Sub no.	Plan Provision/ Topic	Submitter name	Support / Oppose / Neutral	Point No.	Relief sought	Reasons	Accept/Accept in Part	Reject/Reject in Part
43.	General Support	Smoothwater Property Ltd	Support	43.1	Approve the plan change.	<ul style="list-style-type: none"> <li>The plan change will benefit from the roading infrastructure.</li> <li>The plan change will identify Ravenswood as a Key Activity Centre.</li> <li>Enable long term economic growth.</li> <li>Provide an opportunity for new retail/office/community services to establish a presence and existing businesses to set up additional outlets in the district.</li> </ul>		Reject
44.	General Support	Marie Burton	Support	44.1	Approve the plan change.	<ul style="list-style-type: none"> <li>The plan change will benefit Ravenswood and the surrounding towns and suburbs, as well as providing jobs for people in North Canterbury.</li> </ul>		Reject
45.	General Support	Liam Knowles	Support	45.1	Approve the plan change.	<ul style="list-style-type: none"> <li>Creates local jobs.</li> <li>May increase local property price.</li> <li>Bring best possible infrastructure for the area.</li> </ul>		Reject
46.	General Support	SMCL Limited	Support	46.1	Approve the plan change.	<ul style="list-style-type: none"> <li>The plan change will enable the development of commercial and retail facilities that will enhance the area and enhance the area with economic development to support growth in the district.</li> <li>The plan change will benefit from the roading infrastructure and reduce congestion on the roads.</li> <li>The plan change will create new job opportunities.</li> </ul>		Reject
47.	General Support	Donald Smith	Support with Amendments	47.1	Consider a change to the current round about on the Main North Road at the entrance of Ravenswood. Changes may include moving the 50 km zone further north of the roundabout or putting in traffic lights.	<ul style="list-style-type: none"> <li>The plan change may increase the traffic travelling through Ravenswood creating the journey to other parts of North Canterbury hazardous and potentially life threatening.</li> </ul>		Reject

Sub no.	Plan Provision/ Topic	Submitter name	Support / Oppose / Neutral	Point No.	Relief sought	Reasons	Accept/Accept in Part	Reject/Reject in Part
48.	General Support	Sebastiao Investments Ltd.	Support	48.1	<ul style="list-style-type: none"> <li>Approve the plan change.</li> </ul>	<ul style="list-style-type: none"> <li>N/A</li> </ul>		Reject
49.	General Support	Marlborough property Investment Limited	Support	49.1	Approve the plan change.	<ul style="list-style-type: none"> <li>The plan change will encourage businesses to relocate or establish in Ravenswood</li> </ul>		Reject
50.	General Support	Pete Dormer	Support	50.1	Approve the plan change.	<ul style="list-style-type: none"> <li>The plan change will benefit from the roading infrastructure and reduce congestion on the roads.</li> <li>Provide an opportunity for new retail/office/community services to establish a presence and existing businesses to set up additional outlets in the district.</li> <li>The plan change will create new job opportunities.</li> <li>Reduce retail leakage and allow the community to shop locally.</li> </ul>		Reject
51.	General Support	John Dehn	Support	51.1	Approve the plan change.	<ul style="list-style-type: none"> <li>The plan change will benefit the area.</li> </ul>		Reject
52.	General Support	James Burgess	Support	52.1	Approve the plan change.	<ul style="list-style-type: none"> <li>The plan change will benefit from the roading infrastructure and reduce congestion on the roads.</li> <li>The plan change will identify Ravenswood as a third Key Activity Centre</li> <li>Provide an opportunity for new retail/office/community services to establish a presence and existing businesses to set up additional outlets in the district.</li> <li>The plan change will create new job opportunities.</li> </ul>		Reject

Sub no.	Plan Provision/ Topic	Submitter name	Support / Oppose / Neutral	Point No.	Relief sought	Reasons	Accept/Accept in Part	Reject/Reject in Part
						<ul style="list-style-type: none"> <li>Reduce retail leakage and allow the community to shop locally.</li> </ul>		
53.	General Support	Rhonda Mather	Support with amendments	53.1	<ul style="list-style-type: none"> <li>Traffic safety to be improved such as lowering the speed limit.</li> </ul>	<ul style="list-style-type: none"> <li></li> </ul>		Reject
54.	General Support	Paul Everest	Support	54.1	<ul style="list-style-type: none"> <li>Approve the plan change</li> </ul>	<ul style="list-style-type: none"> <li>N/A</li> </ul>		Reject
55.	General Support	Foodstuffs South Island Properties Limited	Support	55.1	<ul style="list-style-type: none"> <li>Approve the plan change</li> </ul>	<ul style="list-style-type: none"> <li>The plan change will benefit from the roading infrastructure and reduce congestion on the roads.</li> <li>The plan change will identify Ravenswood as a third Key Activity Centre</li> <li>Enable long term (23 years) economic growth</li> <li>Provide an opportunity for new retail/office/community services to establish a presence and existing businesses to set up additional outlets in the district.</li> <li>The plan change will create new job opportunities.</li> <li>Reduce retail leakage and allow the community to shop locally.</li> </ul>		Reject
56.	General Support	Pegasus Residents Group Incorporated	Support with amendment	56.1	<ul style="list-style-type: none"> <li>Approve the plan change.</li> <li>Traffic safety needs to be improved.</li> </ul>	<ul style="list-style-type: none"> <li></li> </ul>		Reject



Sub no.	Plan Provision/ Topic	Submitter name	Support / Oppose / Neutral	Point No.	Relief sought	Reasons	Accept/Accept in Part	Reject/Reject in Part
57.	Upgrade State Highway 1	Andrew Huntley	Support with amendment	57.1	Upgrade of the State Highway.	<ul style="list-style-type: none"> <li>Alongside the plan change SH1 needs to be upgraded, a need that will only become more so once this Development and other local developments are completed.</li> </ul>		Reject
58.	General Support	Murray and Valda Powell	Support	58.1	Approve the plan change.	<ul style="list-style-type: none"> <li>N/A</li> </ul>		Reject
59.	General Support	Kevin Kilbride	Support	59.1	Approve the plan change.	<ul style="list-style-type: none"> <li>The plan change will support the growing population of Ravenswood, Woodend and Pegasus.</li> </ul>		Reject
60.	General Support	PAWS Vets	Support	60.1	Approve the plan change.	<ul style="list-style-type: none"> <li>The plan change will promote a central business hub for the growing population and encourage the use of existing roading and infrastructure.</li> </ul>		Reject
61.	Oppose- Traffic Safety	Debbie Bell	Oppose	61.1	Reject the plan change.	<ul style="list-style-type: none"> <li>The roading infrastructure is not suitable for the increased traffic flow.</li> <li>Improvement to the roads are required.</li> </ul>		Reject
62.	General Support	Warren Sillitoe	Support	62.1	Approve the plan change.	<ul style="list-style-type: none"> <li>The plan change will result in a boost to Woodend economy and provide retail destinations for residents.</li> <li>The plan change will create job opportunities in the Woodend area.</li> </ul>		Reject

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63.	General Support	Jellena Balloch	Support	63.1	Approve the plan change.	<ul style="list-style-type: none"> <li>• Add value to the properties in Ravenswood.</li> <li>• Increase employment opportunities.</li> <li>• Having a Key Activity Centre north of the city, would benefit surrounding areas and locals.</li> </ul>		Reject
64.	Oppose- Traffic Safety	Matt Newby	Oppose	64.1	Reject the plan change unless safety improvement and traffic mitigation on Main Road Woodend are installed and proven to be effective.	<ul style="list-style-type: none"> <li>• The traffic modelling in the proposal uses figures from 2018, which are well below current traffic levels. Traffic throughout North Canterbury is growing faster than projected, with Woodend main road currently has close to (if not over) 20000 vehicles per day using it. The proposal presents the Bypass as if it is to be built in the near future, when the reality is we have over 10 years of increasing traffic volumes and associated problems before the bypass will be built. The additional of Ravenswood and other developments has put significant pressure on the Woodend Township which is effectively divided in two by the extremely busy main road. The traffic increase from the proposal, from both customers and goods vehicle servicing the businesses, will put an inequitable burden on the residents of Woodend.</li> </ul>		Reject
65.	General Support	Jesse Allworthy	Support	65.1	Approve the plan change.	<ul style="list-style-type: none"> <li>• The plan change will bring additional revenue to the district.</li> <li>• Provide additional jobs for the increasing population in North Canterbury.</li> <li>• Reduce the number of people having to commute into Christchurch for work.</li> </ul>		Reject
66.	General Opposition	Rae Wakefield-Jones	Oppose	66.1	Reject the plan change.	<ul style="list-style-type: none"> <li>• The plan change will result in an increase of people into the area stretching the already failing roading infrastructure.</li> </ul>	Accept	

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67.	Pedestrian Safety	Anna McHugh	Support with amendments	67.1	To introduce an under path or over bridge between Pegasus and Ravenswood to ensure pedestrian safety.	<ul style="list-style-type: none"> <li>• People are crossing between Pegasus and Ravenswood on foot to get to the current shops which is a state highway with no safe crossing.</li> </ul>		Reject
68.	Pedestrian Safety	Linda Crawford	Support with amendments	68.1	A safe pedestrian and cycle crossing over State Highway One between Pegasus and Ravenswood.	<ul style="list-style-type: none"> <li>• Currently there is no safe crossing to get between Pegasus and Ravenswood over the state highway.</li> </ul>		Reject
69.	Pedestrian Safety	Vera Setz Deuchars	Support with amendments	69.1	To introduce either: <ul style="list-style-type: none"> <li>• a underground walkway or an overpass bridge;</li> <li>• Traffic Lights instead of the roundabout;</li> <li>• Reduce the speed from 70kmh to 30kmh.</li> </ul>	<ul style="list-style-type: none"> <li>• Currently there is no safe crossing to get between Pegasus and Ravenswood over the state highway.</li> </ul>		Reject
70.	Pedestrian Safety	Kylie Schaare	Support with amendments	70.1	Full traffic management plan that includes a new over or under pass.	<ul style="list-style-type: none"> <li>• The increased traffic will increase the unsafety of the area for pedestrians. The amendment will allow pedestrians/cyclists to move safely between Pegasus and Ravenswood.</li> </ul>		Reject
71.	Pedestrian Safety	Christine Johnston	Support with amendments	71.1	To install lights and pedestrian crossing on the highway.	<ul style="list-style-type: none"> <li>• The road is going to become even busier with the plan change. Therefore, the need to create safe access between Pegasus and Ravenswood for pedestrians.</li> </ul>		Reject
72.	Pedestrian Safety	Alissa Kuch	Support with amendments	72.1	To install a controlled crossing point between Pegasus and Ravenswood.	<ul style="list-style-type: none"> <li>• The traffic is going to fast in the area currently for a safe environment for pedestrians to access the commercial area.</li> </ul>		Reject

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73.	General Support	Shirley Goodwin	Support with amendments	73.1	Approve the plan change.	<ul style="list-style-type: none"> <li>The plan change will enable Woodend residents to shop safely and peacefully in a modern and specifically designed retail/commercial area.</li> </ul>		Reject
74.	General Support	John Stowell	Support	74.1	Approve the plan change.	<ul style="list-style-type: none"> <li>N/A</li> </ul>		Reject
75.	Recreational Activities	Kara Trapp	Support with amendments	75.1	To include a variety of recreational activities for children.	<ul style="list-style-type: none"> <li>Shops will be vandalised if there is no recreational activities/areas for the youth of Ravenswood which will effect Pegasus with the children attending school in our subdivision.</li> </ul>		Reject