

**BEFORE INDEPENDENT HEARING COMMISSIONERS APPOINTED BY THE
WAIMAKARIRI DISTRICT COUNCIL**

IN THE MATTER OF

The Resource Management Act 1991 (**RMA** or
the Act)

AND

IN THE MATTER OF

Hearing of Submissions and Further
Submissions on the Proposed Waimakariri
District Plan (**PWDP** or **the Proposed Plan**)

AND

IN THE MATTER OF

Hearing of Submissions and Further
Submissions on Variations 1 and 2 to the
Proposed Waimakariri District Plan

AND

IN THE MATTER OF

Submissions and Further Submissions on the
Proposed Waimakariri District Plan and
Variation 1 by **Bellgrove Rangiora Limited**

**EVIDENCE OF MICHELLE RUSKE-ANDERSON
ON BEHALF OF BELLGROVE RANGIORA LIMITED
REGARDING HEARING STREAM 12E**

Dated: 30 April 2024

Presented for filing by:
Chris Fowler
PO Box 18, Christchurch
T 021 311 784 / 027 227 2026
chris.fowler@saunders.co.nz

INTRODUCTION

- 1 My name is Michelle Raewyn Ruske-Anderson.
- 2 I hold the qualifications of a Master of Environmental Policy and Bachelor of Environmental Management and Planning from Lincoln University, and am a Full Member of the New Zealand Planning Institute.
- 3 I have been employed by Aurecon since 2014 where I currently hold the position of Manager – Environment and Planning.
- 4 My previous work experience includes some nine years in the field of resource management. The majority of this has been in land development (residential and commercial), transport and infrastructure planning, involving the preparation and oversight of resource management applications.
- 5 My role in relation to the Waimakariri Proposed District Plan and Variation 1 is as an independent expert witness to Bellgrove Rangiora Limited (**BRL** or **Bellgrove**) on planning matters. I have been involved with Bellgrove since 2020, preparing the Stage 1 resource consent application approved 29 June 2022 under the COVID-19 Recovery (Fast-track Consenting) Act 2020 (**Stage 1 Consent**)¹, advising on the District Plan Review process and preparing submissions.
- 6 Although this is not an Environment Court proceeding, I have read the Environment Court's Code of Conduct and agree to comply with it. My qualifications as an expert are set out above. The matters addressed in my evidence are within my area of expertise, however where I make statements on issues that are not in my area of expertise, I will state whose evidence I have relied upon. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed in my evidence.

SCOPE OF EVIDENCE

- 7 I have prepared evidence in relation to the relief sought by BRL in relation to Bellgrove South:

¹ Subdivision Consent RC125579 and Land Use Consent RC225227 approved 29 June 2022. In October 2023 these were superseded by Subdivision Consent RC235154 and Land Use Consent RC235155.

- (a) to amend the geographic extent of the South East Rangiora Development Area (**SER-DA**) to include approximately 3.3ha of land immediately to the east of the SER-DA (**Additional Land**);
- (b) amend the notified South East Rangiora Outline Development Plan (**SER-ODP**) to include the Additional Land and various changes sought by BRL as shown in the Bellgrove South Outline Development Plan (**Bellgrove South-ODP**) and the revised overall SER-ODP (the **revised SER-ODP**) (refer **Attachment 2**);
- (c) rezone the full extent of Bellgrove South from Rural Lifestyle Zone (**RLZ**) to Medium Density Residential Zone (**MRZ**) (excluding Lot 4 DP 25508 (100 Northbrook Road) which is already proposed to be zoned MRZ as part of Variation 1) this is an area of approximately 31.2 ha (**the Site**). The Site includes the Additional Land (refer Figure 2 below).

8 Specifically, my evidence is prepared in relation to:

- (a) the Site and its context;
- (b) the relief sought, i.e., proposed MRZ zoning, changes to the SER-ODP and inclusion of the Additional land within the SER-DA and SER-ODP (**the Proposal**);
- (c) the effects of the Proposal;
- (d) addresses the issues associated with the request, including those raised by further submissions;
- (e) provides the required statutory analysis of the various planning documents that sit beneath the RMA and considers relevant non-statutory documents;
- (f) Part 2 Matters - key provisions from Part 2 RMA; and
- (g) Section 32AA evaluation.

9 In preparing this statement of evidence I have considered the following:

- (a) the BRL submissions on the pWDP and Variation 1;

- (b) the statements of evidence filed on behalf of Bellgrove by myself and by Jason Trist in relation to hearing Stream 10A;
- (c) the Infrastructure Acceleration Fund (**IAF**) agreements between Kainga Ora, the Council and Bellgrove Rangiora Limited; at Attachment 5 of my above-mentioned statement of evidence,
- (d) the technical evidence of the following people:
 - i. Mr Jan Kupec– geotechnical matters;
 - ii. Ms Wendy Whitley – land contamination;
 - iii. Mr Geoff Dunham – land productivity;
 - iv. Mr Jason Trist – infrastructure and serviceability;
 - v. Mr Mat Collins – transport;
 - vi. Mr Tony Milne – landscape and visual amenity;
 - vii. Mr Fraser Colegrave - economics;
 - viii. Dr Morgan Tracy-Mines – ecology; and
 - ix. Mr David Delagarza – stormwater and flood management.
- (e) the National Policy Statement on Urban Development 2020 (May 2022) (**NPS-UD**); the Canterbury Regional Policy Statement (**CRPS**); the operative Waimakariri District Plan (**WDP**) the pWDP; the Greater Christchurch Spatial Plan (**GCSP**); Waimakariri 2048 District Development Strategy (**WDDS**) and the Mahaanui Iwi Management Plan (**IMP**); and
- (f) The s32 Reports prepared for the Residential and Rural chapters of the pWDP.

10 To assist the Panel in its understanding and orientation of the BRL landholding in the context of the PWDP and its submission, I have included a series of plans in **Attachments 1-5** that I will refer to where these help reinforce my views and analysis.

SUMMARY OF MY EVIDENCE

- 11 The relief sought by BRL on the pWDP² can best be summarised as ensuring that the pWDP provides for future residential development of the Bellgrove land holdings within South-East and North-East Rangiora. Associated provisions will assist in delivering sufficient, feasible, certain, plan-enabled land development capacity for residential use.
- 12 BRL's landholdings (refer Figure 1C at **Attachment 1**) are largely located within the NER-DA and the SER-DA overlays of the pWDP and consequently are subject to the relevant proposed ODP's (the NER-ODP and SER-ODP).

Bellgrove North

- 13 Bellgrove North is located within the NER DA and included within the NER-ODP. Variation 1 seeks to rezone Bellgrove North to MRZ and BRL lodged a submission in support subject to minor amendments seeking to ensure that the full extent of the Bellgrove North landholding is rezoned. I understand that the Council Reporting Officer, Mr Wilson is in general agreement regarding this relief³ and as a result the focus of my planning evidence for this hearing stream is on the rezoning (and subsequent amendments sought to the SER-DA and SER-ODP) related to Bellgrove South. Should any additional matters be raised in the s42A Report for Hearing Stream 12E they will be addressed as part of supplementary evidence.

Bellgrove South Rezoning to MRZ

- 14 Bellgrove South is located within the SER DA and SER ODP except for a small 3.3ha area of land (**Additional Land**). I note that my evidence for BRL in Hearing Stream 10A⁴ referred to this Additional Land being approximately 4.0ha in area. It has since become apparent that this was incorrect and should have been noted as being 3.3ha.
- 15 BRL seek that 31.2 ha of the Bellgrove South landholding (inclusive of the Additional Land) be rezoned from Rural Lifestyle (**RLZ**) to Medium Density Residential Zone (**MRZ**). BRL also seek changes to the SER-ODP, intended to guide future development of the Site. Since the lodgement of submissions, the changes sought by BRL to the SER-ODP have been refined further in response

² Submissions 408 and 413 on the pWDP and Submission 79 on Variation 1 to the pWDP.

³ Telephone Correspondence between Mr Wilson and myself 8 February 2024.

⁴ Planning Evidence of Michelle Ruske-Anderson for Hearing Stream 10A, para 92

to additional technical inputs (refer to the **revised SER-ODP** at Figure 2B at **Attachment 2**).

- 16 The rezoning would yield approximately 363 additional medium density residential lots⁵, exceeding 15 households per hectare. Except for the small 3.3ha of Additional Land, the rezoning is readily anticipated by the higher order planning documents, located within an area identified for future greenfield residential development by the Greater Christchurch Partnership's Our Space 2018-2048, the CRPS, the pWDP and more recently the Greater Christchurch Spatial Plan (**GCSP**).
- 17 I consider the rezoning is appropriate because:
- (a) the amount of greenfield residential land required to meet the projected demand for residential growth in the Waimakariri District over the short to medium term (3-10 years) and medium to long term (10-30 years) requires additional land over and above that to be rezoned in the notified pWDP⁶.
 - (b) East Rangiora is an appropriate location for future residential development given it is consistent with the higher order planning documents for future urban growth of Greater Christchurch and is a logical expansion to Rangiora.
 - (c) The Site is a suitable location for greenfield residential growth given:
 - i. the soil within the Site is suitable for residential development from both a geotechnical and contamination perspective;
 - ii. is not highly productive land and is therefore not subject to the National Policy Statement for Highly Productive Land (**NPS-HPL**)

⁵ An indicative concept layout produced for Bellgrove South dated 3 April 2024 estimates an indicative yield of approximately 437 residential lots (including approximately 74 located within Lot 4 DP 25508 which is already residential zoned).

⁶ Economic Evidence of Mr Colegrave, para 36 and 74.

restrictions⁷. In addition, the loss of productive farmland as a result of rezoning would be minimal⁸;

- iii. the Site has good internal and external transport connections across multiple modes (the revised SER-ODP would ensure a good level of vehicle, pedestrian and cycle connectivity within the Site and to both existing and future anticipated residential subdivision connections in the surrounding area)⁹;
- iv. the Site can be serviced with all the necessary infrastructure and is infrastructure-ready¹⁰;
- v. while the Site is at some risk of flooding, future subdivision and stormwater management design and mitigation can ensure that development of the Site does not worsen flooding beyond the site, whilst also ensuring that any flood risk is appropriate for future MRZ use of the Site¹¹;
- vi. the future MRZ development in accordance with the revised SER ODP can be designed and undertaken in a manner that ensures there is at least no net loss of biodiversity, and most likely a biodiversity gain¹² and;
- vii. the Site is located adjacent to established residential development adjoining the west, recently established residential development to the north, and future residential development anticipated to the south (within the SER-DA), these areas currently or will in the future share a similar residential character as sought by the MRZ zoning. The revised SER-ODP has been designed to integrate with the neighbouring residential development and the scale and nature of development within the Site will be generally consistent with the

⁷ The Site is to be rezoned RLZ in the pWDP and as such it is considered that the Site (currently zoned rural in the operative WDP) is subject to a Council initiated change to rezone it from general rural to rural lifestyle and therefore the NPS-HPL does not apply (Cl. 3.5(7)(b)(ii)). Further the Site (except for the Additional Land) is identified for future urban development and as a result is not deemed highly productive land under the NPS-HPL (Cl. 3.5(7)(b)(i)). This is consistent with Mr Buckley's view in the Memo titled '*Amended National Policy Statement on Highly Productive Land*' to the Hearing Panel dated 22 July 2023.

⁸ Land Productivity Evidence of Mr Dunham (para 94 and 108) which concludes there is no reliable long term economically viable primary production land use for this Site, or for the Additional Land.

⁹ Transport Evidence of Mr Collins (para 75-76)

¹⁰ Infrastructure and Serviceability Evidence of Mr Trist (para 58) and the Transport Evidence of Mr Collins (para 63)

¹¹ Stormwater and Flood Management Evidence of Mr Delagarza, para 65

¹² Ecological Evidence of Dr Tracy-Mines, para 105

development scale of the existing land use of the neighbouring development¹³.

18 In terms of statutory framework, the key matter for consideration is whether the change in zoning better gives effect to the higher order statutory framework compared with the RLZ proposed in the pWDP. In that regard, I conclude the following:

- (a) Subject to detailed design and consenting through the subdivision process, the Proposal will enable a form of development that gives effect to the National Policy Statement for Freshwater Management 2020 (**NPS-FM**), the National Policy Statement for Indigenous Biodiversity 2023 (**NPS-IB**), and the National Environmental Standards for Freshwater 2020 (**NES-F**) as outlined in my assessment below.
- (b) The Site is proposed to be zoned RLZ in the pWDP and as such it is considered that the Site (currently zoned rural in the operative WDP) is subject to a Council initiated change to rezone it from general rural to rural lifestyle and therefore the NPS-HPL does not apply¹⁴ (Cl. 3.5(7)(b)(ii)). In addition, the Site (except for the Additional Land) is identified for future urban development¹⁵, and as a result is not deemed highly productive land under the NPS-HPL (Cl. 3.5(7)(b)(i)). Further, if the Additional Land were to remain RLZ zoned by itself it would be unable to generate sufficient income to cover direct expenses, interest and principle meaning that the loss of rural land is not considered an impediment to its rezoning¹⁶.
- (c) The rezoning of the Site (except for the Additional Land) is in accordance with the CRPS, largely being located within a Future Development Area (**FDA**) of Map A and in accordance with Policy 6.3.12 'Future Development Areas'. In terms of the NPS-UD, the evidence of Mr Colegrave demonstrates that additional residential capacity in the

¹³ Landscape and Visual Character Evidence of Mr Milne, para 101

¹⁴ This is consistent with Mr Buckley's view in the Memo titled '*Amended National Policy Statement on Highly Productive Land*' to the Hearing Panel dated 22 July 2023 where he notes his position is that "*a district plan review is a plan change (or collection of changes) and that the notified Rural Lifestyle Zone is excluded from the NPS-HPL.*", para 8.

¹⁵ Refer to Attachment 4 which covers the planning history of the Site and images from the relevant statutory documents that have identified it for future urban development including the UDS, CRPS, Our Space and the GCSP.

¹⁶ Agricultural Productivity Evidence of Mr Dunham, para 94

district is required¹⁷, and the rezoning of the Site would give effect to Objective 6 of the NPS-UD being the most responsive approach to plan enable sufficient supply of development capacity in the District.

- (d) The Proposal aligns with the Strategic Directions in the notified pWDP.
- (e) Overall, in my opinion, the rezoning of the Site to MRZ, guided by the revised SER-ODP, will be a more efficient, effective, and appropriate way of enabling the pWDP to give effect to the higher order statutory framework, compared to the notified RLZ zoning of the Site.

The revised SER-ODP

- 19 The changes sought to the SER-ODP better reflect the ultimate development outcome sought for Bellgrove South and have been developed through dialogue with technical experts. Generally, the changes seek to include the Additional Land and introduce additional features / controls to maintain or enhance environmental outcomes, particularly at the Site's boundary interfaces with adjacent rural land.

Inclusion of the Additional Land

- 20 The location of the Additional Land outside the FDA identified by Map A of the CRPS and consequently the SER-DA and SER-ODP of the pWDP effectively severs the 14 ha Lot 2 DP 452196. Since the original 2007 Rangiora Projected Infrastructure Boundary (**PIB**) was notified, I understand there has been no opportunity to modify the boundary line of the PIB to reflect cadastral boundaries (as I understand was originally intended). As a result, the 3.3ha of Additional Land within BRL's almost 100ha total landholding has been excluded from the long-established urban growth strategy for East Rangiora. For the reasons outlined in my evidence below this appears to be a unique situation.
- 21 Policy 8 of the NPS-UD provides for unanticipated and out-of-sequence developments or 'responsive planning'. Whilst the CRPS largely gives effect to the NPS-UD, I consider that provision for a more responsive approach to ensure sufficient development capacity required by the NPS-UD is not yet provided for in the CRPS. On this basis, despite not being identified by the higher order planning documents for future urban growth of Greater Christchurch I consider the inclusion of the Additional Land within this rezoning request consistent with

¹⁷ Economic Evidence of Mr Colegrave, para 74

Policy 8. It will add significant housing capacity¹⁸, contribute to a well-functioning urban environment and be well-connected along transport corridors.

22 Further the Additional Land can be distinguished from other land at the periphery of urban areas because of the following circumstances:

- (a) Excluding the Additional Land would result in the creation of a non-complying rural balance lot (less than 4 ha in area);
- (b) The Additional Land would effectively be land locked if it remains RLZ, required to be accessed through the road network developed in accordance with the SER-ODP;
- (c) The notified SER-ODP identifies two road connections to the Additional Land from BRL's landholding within the SER DA, presumably in anticipation of future residential development of the Additional Land;
- (d) No submissions have opposed the inclusion of the Additional Land;
- (e) The Infrastructure Acceleration Fund (**IAF**) Agreements (Attachment 5 of my Hearing 10A evidence) relate to BRL's entire landholding, including the Additional Land, as demonstrated by the 'Land Map' in Figure 4L, **Attachment 4**; and
- (f) The Additional Land is infrastructure ready, able to be serviced with all the necessary infrastructure¹⁹ and readily integrated as part of development of Bellgrove South and
- (g) the Additional Land is not viable for continued long term use as productive land as a 3.3ha block with Mr Dunham concluding that no options are available to generate sufficient income to cover direct expenses, interest & principle, with the best option estimated to result in an operating surplus of \$750.0 at best²⁰.

¹⁸ Economics Evidence of Mr Colegrave (paras 108-110) outlines that development comprising 20 or more dwellings is considered to add 'significant housing capacity' to Greater Christchurch. The indicative concept layout for Bellgrove South suggests an additional yield of 28 residential lots would be enabled by the inclusion of the Additional Land.

¹⁹ Infrastructure and Serviceability Evidence of Mr Trist (para 58) and the Transport Evidence of Mr Collins (para 63)

²⁰ Land Productivity Evidence of Mr Dunham, paras 106-108

- 23 These distinguishing factors provide confidence that the inclusion of the Additional Land within the SER DA would not set a precedent for widespread changes to the FDA's that are inconsistent with Map A of the CRPS.
- 24 Overall, I consider that the Proposal (the MRZ zoning and revised SER-ODP) achieves the purpose of the Resource Management Act 1991 in the most appropriate way.

CONTEXT

- 25 For the purposes of development (and utilising the natural demarcation provided by Kippenberger Avenue) BRL's landholdings (refer **Attachment 1**) in eastern Rangiora (referred to as Bellgrove) are divided into **Bellgrove North** and **Bellgrove South**.
- 26 All of Bellgrove is zoned Rural under the operative Waimakariri District Plan (**WDP**), except for a 4.6ha piece of land (Lot 4 DP 25508) which is already zoned Residential 2 (located in the western area of Bellgrove South).
- 27 The Bellgrove North landholding is largely proposed to be rezoned MRZ as part of Variation 1 to the pWDP and located within the NER-DA overlay of the pWDP.
- 28 Bellgrove South (except for the already residential zoned portion) is zoned RLZ in the pWDP. The Site (excluding the Additional Land) is also within the SER-DA overlay, which is one of four new development areas identified in the pWDP intended to provide for future growth (primarily residential) over the coming decades. These new development areas align with the Future Development Areas within the CRPS and are subject to the relevant proposed ODP's contained within the pWDP (the NER ODP and SER ODP).

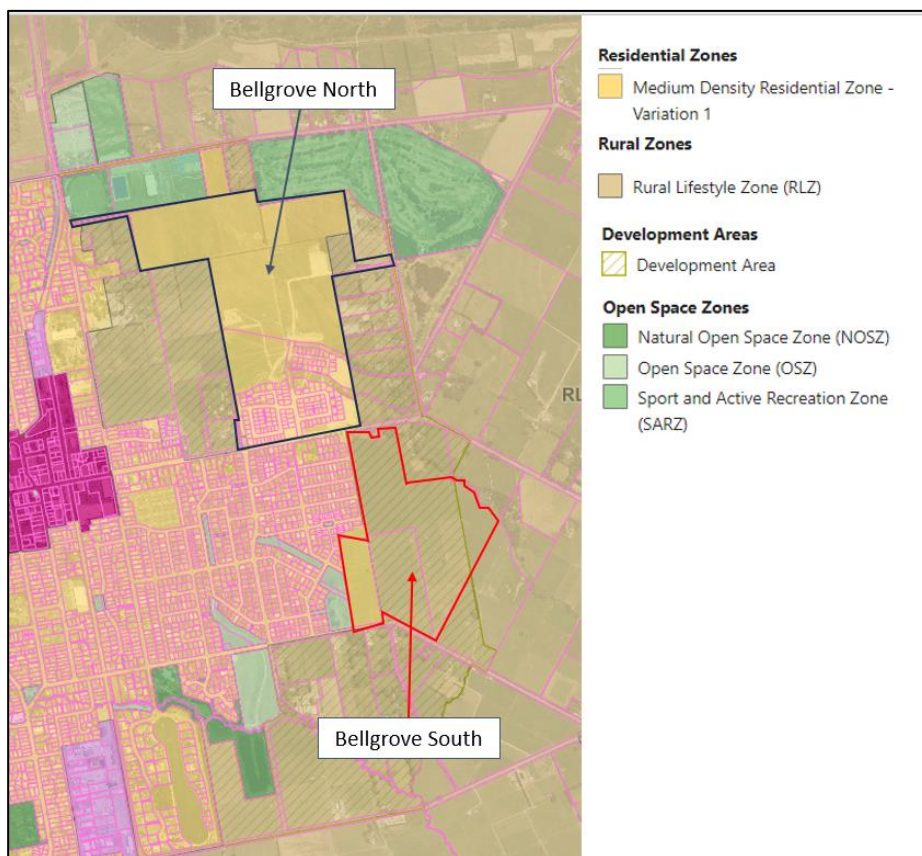


Figure 1. Bellgrove North and South proposed zoning under the pWDP

- 29 The notified provisions of the pWDP identify a certification mechanism to release land within a development area overlay for urban development once a number of certification tests (namely technical and specific engineering requirements for servicing, as well as more general assessments for geotechnical and transportation issues) have been addressed.

Background to pWDP

- 30 Given Bellgrove's location within the NER-DA and SER-DA overlays, BRL's submissions on the pWDP have a specific focus on the provisions for the New Development Areas. The first submission on the pWDP expressed:

- a) broad support for the identification of the NER DA (relevant to Bellgrove North) and the SER DA (relevant to Bellgrove South) and provisions that enable the transition from the underlying proposed RLZ to residential development, subject to a prescribed certification process;
- b) general support for the provisions that are supportive of enabling residential growth;

- c) the need for additional flexibility and provision for residential development within the pWDP through the adoption of provisions that will deliver sufficient, feasible, certain, plan-enabled land development capacity for residential use; and
- d) changes to the NER ODP and SER ODP to reflect the proposed subdivision layout and additional work undertaken by Bellgrove following input into WDC's draft East Rangiora Structure Plan process, and inclusion of the Additional Land.

31 Bellgrove's subsequent submission (accepted late) on the pWDP sought its landholding be zoned for residential purposes rather than subject to the proposed certification process. The submission was made on the basis that the Resource Management (Enabling Housing Supply and Other Matters) Amendment legislation which had been recently enacted, had the potential to delay the hearing and decisions on the pWDP, with a consequential delay in the certification provisions becoming operative and, in turn, the effective rezoning of Bellgrove's land.

32 Variation 1 to the pWDP largely rezones Bellgrove North (located within the NER DA) from RLZ to MRZ. BRL lodged a submission on Variation 1, supporting the proposed rezoning of Bellgrove North, subject to minor amendments. Bellgrove's submission on Variation 1, and its late submission on the pWDP seeking immediate rezoning of the Bellgrove South land is the subject of this evidence.

Bellgrove North

33 Given Variation 1 seeks to rezone Bellgrove North to MRZ and BRL has lodged a submission in support subject to minor amendments (which I understand the Council Reporting Officer Mr Wilson is in general agreement to), the focus of this evidence is on the rezoning of the Site in Bellgrove South and subsequent revisions sought to the SER-ODP and SER-DA.

34 Amendments sought to the NER-ODP were covered off in paragraphs 25 to 31 of my Hearing Stream 10A evidence and I do not repeat these here other than to advise that the changes sought are contained within the marked up plans at **Attachment 3C**. I note for completeness and consistency that BRL's submission on Variation 1 sought the inclusion of the full extent of the Bellgrove North

landholding to be zoned MRZ, noting an area of BRL land adjacent to the golf course had been indiscriminately omitted from the Zone, despite being identified within the NER ODP (refer Figure 1C at **Attachment 1**). From discussions held with Mr Wilson²¹ to date, I understand this Additional Land in Bellgrove North will be recommended to also be rezoned MRZ.

THE RECEIVING ENVIRONMENT

The Site

35 Bellgrove South has a total area of 36 ha comprising the 31.2ha Site (including 3.3ha of Additional Land) and 4.6ha of land already proposed to be zoned MRZ (Figure 2). It is currently being used for rural purposes.



Figure 2. Extent of Bellgrove South showing the Site (in green), the Additional Land (in blue) and land already zoned for residential development (in red) in the pWDP

36 Bellgrove South is abutted by residential land to the west (Devlin Avenue), land earmarked for future residential development to the south (also located within the SER DA) and rural land use to the east. The Cam / Ruataniwha River forms a natural boundary along the northern portion of the eastern boundary with Lot 2 DP 452196.

²¹ Telephone Communications with Mr Wilson and myself 8 February 2024.

- 37 Except for the Additional Land (blue area in Figure 2 above), the Site is located within the Future Development Area and the Rangiora Projected Infrastructure Boundary (**PIB**) of Map A of the CRPS.
- 38 To the immediate north of the site, on the other side of Kippenberger Avenue Bellgrove North is currently under development in accordance with the consent approved under the COVID-19 Recovery (Fast-track Consenting) Act 2020 for 198 residential lots (Figure 4J and Figure 4M, **Attachment 4**). In addition, the roading upgrade to Kippenberger Avenue with the new Kippenberger Avenue roundabout has been completed.

PROPOSED REZONING AND AMENDMENTS SOUGHT

- 39 BRL seek to rezone the full extent of Bellgrove South from RLZ to MRZ in the pWDP. Excluding Lot 4 DP 25508 (100 Northbrook Road) which is already proposed to be zoned MRZ as part of Variation 1, this is an area of approximately 31.2 ha. The RLZ has a minimum allotment area of 4ha, whilst the MRZ as proposed by Variation 1 removes any minimum allotment area (refer Table Sub-1 in the pWDP).
- 40 BRL also seek to amend the geographic extent of the SER-DA overlay and SER-ODP to include the Additional Land. In addition, they seek to amend the notified SER-ODP to better reflect the ultimate development outcome sought for Bellgrove South.
- 41 Accounting for the space required for civil infrastructure including roading, stormwater facilities, esplanade reserve provisions and greenspace, and developing the Site in accordance with the revised SER-ODP (inclusive of the Additional Land) an approximate yield of an additional 363 residential households is anticipated.

Outline Development Plan

- 42 The following paragraphs summarise the key features of the notified SER-ODP as it related to Bellgrove South, the changes sought by BRL in earlier submissions and the final suite of changes sought by BRL to the SER-ODP developed through dialogue with technical experts.
- 43 The pWDP included an ODP for the SER DA (a copy of the notified SER-ODP plans and a summary of the key features as they relate to Bellgrove South are

contained at **Attachment 3A**). Key features of the notified SER ODP include enabling general residential density; the establishment of two north/south primary roads; two secondary east/west link roads; an open space and stormwater reserve network comprising a centrally located open space reserve, three green links, identification of the Cam / Ruataniwha River as a flow path and waterway to be protected; a water and waste-water network comprising a new sewer main along the Devlin Avenue extension, new water mains following the proposed SER ODP roading network. No stormwater reserves are identified or anticipated within Bellgrove South with the nearest located to the south-east on 52 Northbrook Road (Lot 2 DP 306045), similarly a new pump station is shown to the south-east of the Site (also on 52 Northbrook Road).

- 44 The amendments sought by BRL to the SER ODP in their submissions on the pWDP and Variation 1 are described and included at **Attachment 3**. Key changes sought to the SER ODP included the inclusion of the Additional Land; enabling medium density residential density (as opposed to general); replacing the two primary north / south primary roads with a single main north/south primary road; changes to the open space network including a stormwater facility located within the south eastern corner of the Site, removal of the three green links shown with a new green link proposed adjacent to the Cam / Ruataniwha River and eastern boundary, and a realignment and reduction in area of the recreation reserve. Amendments to the water and wastewater network include revised alignments to follow the revised roading network and the relocation of the pump station west within the Site.

Summary of the revised changes sought by the BRL to the SER-ODP

- 45 Since the lodgement of the submissions and Hearing Stream 10A, additional work has been undertaken to confirm how Bellgrove South should be developed. A final suite of changes sought by BRL has been compiled following dialogue and expert from the technical experts with **Attachment 2** depicting these:

- (a) *Attachment 2A – ‘the Bellgrove South ODP’ focuses in on the Bellgrove South landholding; and*
- (b) *Attachment 2B – ‘the revised SER ODP’ shows the overall SER-ODP and incorporates the changes sought by BRL. This same map is included at Sheet 10 of the Graphic Attachment to Mr Milne’s evidence*

but clearly showing the Projected Infrastructure boundary (PIB) of Map A of the CRPS.

46 The key features of the revised SER ODP are summarised as:

(a) *Indicative Road Layout*

i. *Single North South Primary Road.*

Retain the Devlin Road extension on the notified SER-ODP as a primary road with cycleway between Kippenberger Avenue and Northbrook Road.

The second north / south road further east is shown as a secondary road (as opposed to a primary road as notified) and realigned slightly west to improve setback distances from the intersection with Golf Links Road and ensure it is located within the BRL landholding.

ii. *Secondary Roads.*

Retain the notified locations for the two secondary east/west link roads with an additional north/south connection added to their eastern extent within the Additional Land.

(b) *Open Space and Stormwater Reserves*

i. Inclusion of an approximate 6.5ha stormwater reserve within the south eastern corner of the Site;

ii. Removal of the three green links on the notified SER ODP. Inclusion of two new green links:

(A) new north-south green link adjacent to the Ruataniwha / Cam River and eastern boundary extending south to Northbrook Road; and

(B) new east-west green link south of the Truman Road extension road connection Truman Street to the stormwater reserve.

iii. Removal of the southern portion of the Recreation Reserve and a relocation north; and

- iv. Inclusion of open space reserve along the length of the Cam / Ruataniwha River boundary and connecting through to the stormwater reserve location in the south.

(c) Land Use

Identification of all the residential land as Medium Density Residential.

(d) Additional Land Inclusion

Inclusion of the area of Additional Land.

(e) Water and Wastewater Network

Amendments to ensure the water and wastewater network generally follows the revised roading network. Relocation of the pump station west within the BRL landholding (refer Figure 2B-2 at **Attachment 2**).

47 In addition, I note:

- (a) The two on-site springs and the farm drains are not shown on the revised SER ODP. This is because the underlying pWDP waterway setback provisions will apply; and
- (b) Additional cycleway connections will be established as part of subdivision consent over and above that shown on the revised SER ODP.

48 The changes shown on the revised SER-ODP have been reviewed by both the Council Reporting Officer Mr Wilson and Mr Thomson for Richard and Geoff Spark (the other large landholding developer in the SER ODP (Further Submission 37 on the pWDP)) on 12 April 2024. Following this, a combined plan is being prepared at Mr Wilson's request incorporating the changes sought by both BRL and the Sparks to demonstrating the alignment between the two developers. This will be filed as part of supplementary evidence in due course.

MERITS OF THE PROPOSAL- ASSESSMENT OF EFFECTS

49 The Site except for the Additional Land is identified in the higher order planning documents for future urban greenfield development (it is within a FDA and the Rangiora PIB on Map A of the CRPS). Acknowledging this, specific commentary related to the Additional Land is included where applicable.

Positive Effects

- 50 The Proposal would allow for approximately 363 additional future residential lots / dwellings. This would provide housing supply for Rangiora, and thus contribute to increasing the housing capacity available in the Waimakariri District in the short-medium term. This is a positive effect, providing additional housing choice and supply in a location of high demand within the Waimakariri district. Rezoning the site to MRZ would plan enable future residential development in close proximity to the existing township of Rangiora. The proposed residential growth would be managed effectively through the revised SER ODP which ensures there is sufficient vehicular and pedestrian movement throughout the Site, and that the Site can be serviced efficiently and effectively.
- 51 The rezoning would also help facilitate further development of the SER-DA as noted by Mr Trist given it will help provide services south²² (i.e., the provision of reticulated water to Northbrook Road). In addition, the stormwater reserve is sized to accommodate the development of an approximate 2.6 ha area of land (521 Rangiora Woodend Road (Lot 1 DP 80275), 23 Kippenberger Avenue (Lot 1 DP 16043) and half of Kippenberger Avenue road reserve); and the new pump station will service land located east of the Site within the SER-DA. Thus, a positive effect of rezoning is that it specifically provides servicing in a timely manner (first) for adjoining development to occur in the future following their release for residential development.
- 52 The Site also has positive effects for Infrastructure Efficiency. As the Site is adjacent to developed residential land and is predominantly located within the Rangiora PIB, the proposed development is likely to achieve high levels of infrastructure efficiency²³. This is reinforced by the central government support provided by the IAF for the infrastructure required to develop the Site.
- 53 Mr Trist comments on this further noting that *the Additional Land area can be easily developed in conjunction with the wider Bellgrove South landholding, aided by the fact that all the land is in Bellgrove's sole ownership. This will provide the opportunity for the future development of this land to be comprehensively designed and master planned to ensure good connectivity, integration and continuity with the wider development area, and assist the*

²² Infrastructure Evidence of Mr Trist, paras 49 and 52

²³ Economic Evidence of Mr Colegrave, para 91

*provision of housing in accordance with the IAF agreements. This also means the land can be developed without impeding on any other landowners because access can only be obtained through the Bellgrove landholding, with the Cam/Ruataniwha River providing a natural barrier with the adjoining landowners.*²⁴

Residential Land Supply and Economic Benefits

- 54 Mr Colegrave's economic evidence assesses the district's population and housing context and outlines that an estimated 17,000 extra dwellings over the next 30 years will be required according to the latest figures²⁵. He identifies that the rezoning is essential to ensure that the Council keeps pace *with demand and helping to meet the district's NPS-UD obligations to provide "at least" sufficient capacity "at all times."*²⁶
- 55 Without the rezoning the proposed housing capacity provided for within the notified pWDP will contribute to the district facing a *significant, widespread shortage of feasible capacity to meet demand, with a lot more needed.*²⁷
- 56 Not only would the rezoning provide for additional housing capacity, but it will provide for a range of lot sizes (notably this will include lots substantially smaller than the existing Rangiora residential stock), assisting the Council to meet Policy 1 of the NPS-UD regarding enabling a variety of homes to ensure a well-functioning urban environment²⁸.
- 57 In addition, the rezoning would result in the positive economic benefits for the district with future construction activity with the rezoning and subsequent future development anticipated to *boost national GDP by \$121 million, including flow on effects, generate employment for 900 FTE-years, and generate \$59 million in household incomes.*²⁹ Further, the development Bellgrove South will provide significant commercial support for Rangiora businesses³⁰.
- 58 Specifically in relation to the Additional Land the economic evidence notes that the development of an additional 28 lots is a meaningful and significant

²⁴ Infrastructure Evidence of Mr Trist, para 58

²⁵ Economic Evidence of Mr Colegrave, para 11 and 38

²⁶ Economic Evidence of Mr Colegrave, para 13

²⁷ Economic Evidence of Mr Colegrave, para 16

²⁸ Economic Evidence of Mr Colegrave, para 79 and 81

²⁹ Economic Evidence of Mr Colegrave, para 98

³⁰ Economic Evidence of Mr Colegrave, para 89

contribution to housing supply³¹. In addition, it assists to improve the overall viability of development of the Site by spreading significant costs (such as bulk infrastructure provision) across a larger site helping keep housing more affordable. On this basis, the inclusion of the Additional Land within the Site to be rezoned MRZ, and subsequent within the revised SER-ODP and SER-DA is supported on economic grounds.

59 Overall, the economic evidence is that the Proposal *will provide a substantial, direct boost in the district's dwelling capacity, thereby helping to narrow the gap between likely future supply and demand*³².

Character, Amenity and Landscape

60 Development enabled by the Proposal will enable the comprehensive development of Rangiora east in general accordance with higher order planning documents. The proposed MRZ zoning will alter the existing urban form and landscape of the South-East Rangiora area and it is acknowledged that *MRZ is a departure from what would up to now be considered a 'normal' or traditional and familiar residential development for Rangiora and this difference in itself may create an effect some would consider to be adverse.*³³

61 Whilst future development enabled by MRZ compared to RLZ will result in quite different landscape and visual effects, Mr Milne notes that future development will be viewed in *the context of logical urban form extension to the existing urban fabric of Rangiora. The Site offers a sense of containment through its geographical location (wedged between the existing edge of Rangiora and the Cam/Ruataniwha River) and with appropriate interface treatments, coupled with the provisions of the MRZ in the notified pWDP, the effects can be appropriately managed.*³⁴

62 Mr Milne notes that changes to rural and natural character are inevitable on any proposal of this nature and concludes that whilst the effects on landscape are appropriate given the revised SER-ODP will afford protection and enhancement to the existing physical landscape values of the Site (these primarily being

³¹ Economic Evidence of Mr Colegrave, para 108-112

³² Economic Evidence of Mr Colegrave, para 75

³³ Landscape and Visual Character Evidence of Mr Milne, para 99

³⁴ Landscape and Visual Character Evidence of Mr Milne, para 106

associated with the Cam / Ruataniwha River) by incorporating blue green network links combined with recreational opportunities³⁵.

63 Mr Milne reviews the changes sought to the SER-ODP concluding that the changes are a *logical development from the notified SER-ODP with several effective improvements and opportunities in terms of landscape values*³⁶, acknowledging the better connection provided to the Cam / Ruataniwha River, and the improved and integrated open space and green network connections.

64 Specifically in relation to the Additional Land, Mr Milne concludes that its inclusion provides *a rational and logical basis for the completion of the future urban form of the eastern edge of Rangiora in this location. The potential adverse effects arising from this can be appropriately managed and this is provided for by the Revised SER-ODP*³⁷, which includes a green interface along the eastern boundary physically and visually separate future development from the rural land to the immediate east and the one dwelling immediately adjacent to the eastern boundary of the Additional Land.

65 Based on the landscape and visual character evidence any potential adverse visual and landscape effects of future residential development in accordance with MRZ and the revised SER-ODP can be appropriately mitigated. The revised SER-ODP offers benefits to connectivity, urban quality, and protection of existing landscape features.

Transport

66 Mr Collins' has assessed the existing land use and transport environment including the existing and future functionality of the road network, road safety, and availability and provision of different transport modes.

67 He concludes that once the Eastern Rangiora Link Road is constructed, the transport network will continue to operate with excellent level of service and modest delays at key intersections during peak periods with the trip generation from development anticipated in accordance with a MRZ zoned Site³⁸. Should development proceed the construction of the Eastern Rangiora Link Road (scheduled in WDC's Draft Long Term Plan to be complete 229/2030) then Mr

³⁵ Landscape and Visual Character Evidence of Mr Milne, para 20

³⁶ Landscape and Visual Character Evidence of Mr Milne, para 122

³⁷ Landscape and Visual Character Evidence of Mr Milne, para 135

³⁸ Transport Evidence of Mr Collins, para 62

Collins' considers that further assessment would be required prior to subdivision but that this is appropriate provide for thought the relevant subdivision and transport provisions of the pWDP, including TRAN-R20 'High Traffic Generators'.

68 Mr Collins' has inputted to the revised SER-ODP and has commented in relation to the changes to the movement network that:

- (a) the extension of the Secondary Roads shown on the notified SER-ODP into the Additional Land is an appropriate layout for future connectivity to this area³⁹;
- (b) relocation of the eastern north / south road slightly west to improve setback distances from the intersection with Golf Links Road and ensure it is located within the Bellgrove South landholding. In addition, the revised SER ODP reclassifies this from a Primary Road to a Secondary Road typology. This is a change from the notified SER -ODP which proposes two north / south corridors through the Site. Mr Collins' considers that eastern north/south road does not have the same strategic importance as the western north/south road which provides a key link in the Rangiora transport network. The eastern north/south road will not cater for trips of intermediate length, will not provide a key connection between strategic road, and is unlikely to form part of the key freight routes for Rangiora ⁴⁰.

69 The revised SER ODP complies with the pWDP requirements regarding intersection spacings and provides good connectivity to the existing and future Rangiora urban area for all modes (including walking, cycling and the existing public transport network). In addition, it will maintain a similar level of transport network connectivity as the notified ODP⁴¹.

70 Detailed roading and access designs will be provided as part of future subdivision consent and engineering approval for the site. The future application will need to address all other roading and access requirements of the District Plan.

³⁹ Transport Evidence of Mr Collins, para 67

⁴⁰ Transport Evidence of Mr Collins, para 73

⁴¹ Transport Evidence of Mr Collins, para 85

- 71 Specifically, in relation to the Additional Land, the transport evidence notes that the Additional Land can be appropriately accommodated within the future transport network and the modelling assessment of the potential trip generation undertaken included the yield enabled by the Additional Land.
- 72 Mr Collin's overall conclusion is that the proposed rezoning of the Site and changes proposed by the revised SER-ODP is not anticipated to give rise to adverse effects on the strategic transport network⁴². The transport provisions of the pWDP are appropriate for assessing the internal road design and site layout at the subdivision consent stage⁴³.

Three Waters Infrastructure and Site Servicing

- 73 From a three waters perspective (water, stormwater and wastewater) the Site can be adequately serviced as outlined in the water and wastewater evidence of Mr Trist and the stormwater evidence of Mr Delagarza.
- 74 Specifically, the evidence of Mr Trist assesses the Proposal's anticipated water supply and wastewater demand. This confirms that the Site can connect to existing and planned Council infrastructure for the disposal of wastewater. As part of future development of Bellgrove South a new pump station will be installed within the south-eastern corner of the Site with IAF funding already allocated to cover a portion of the cost associated with this⁴⁴.
- 75 The Site can be serviced by water via the proposed internal roading network that would be developed in accordance with the revised SER-ODP and connecting into the existing Council water mains located in Kippenberger Avenue, Devlin Avenue and Northbrook Road. There will be no restrictions with providing adequate water supply with planned upgrades (several new water mains and upgrades to existing mains) providing sufficient operating service.
- 76 The changes to the water and wastewater network within the revised SER-ODP shown at Figure 2B-2 of **Attachment 2** simply align the proposed water and wastewater lines with the future roading alignment and will not impede the development potential of other properties within the SER DA, including those to the south of Northbrook Road⁴⁵. The realignment of the new pump station

⁴² Transport Evidence of Mr Collins, para 100

⁴³ Transport Evidence of Mr Collins, para 55

⁴⁴ Infrastructure Evidence of Mr Trist, para 36

⁴⁵ Infrastructure Evidence of Mr Trist, para 43

to the west is considered more appropriate than the notified SER-ODP given it is located within BRL land and will largely service Bellgrove South.

- 77 Lastly, the evidence demonstrates that inclusion of the Additional Land can be readily serviced as part of the Bellgrove South development with all key infrastructure proposed to service the Site (i.e. sewer pump stations) sized to provide capacity to service the Additional Land.⁴⁶
- 78 From a stormwater infrastructure perspective Mr Delagarza outlines that stormwater generated from future medium density residential development within the Site would be directed to the development's stormwater reticulation network which would convey flows to a stormwater management area (SMA) located within the Stormwater Reserve shown on the revised SER ODP. The SMA would provide for attenuation and treatment ultimately discharging downstream into the North Northbrook waterway and the Cam/Ruataniwha River⁴⁷. Mr Delagarza has inputted to the revised SER-ODP and this has resulted in the Stormwater Reserve area being sized to ensure that hydraulic neutrality is achieved for the Site⁴⁸.
- 79 Mr Delagarza notes that the proposed stormwater management comprising first flush and attenuation basins and a wetland facility would comprise a treatment train that would provide primary and secondary treatment for the removal of contaminants. The treatment provided by the SMA associated with the proposed development is expected to substantially improve the quality of the stormwater runoff from the Site⁴⁹.
- 80 Lastly, in relation to other infrastructure Mr Trist confirms that the Site (including the Additional Land) can be appropriately serviced by power and communications services⁵⁰.
- 81 Overall, the technical evidence demonstrates that MRZ-enabled development of the Site can be adequately serviced with three waters infrastructure, the detailed design of which will be appropriately addressed through the subdivision consent process.

⁴⁶ Infrastructure Evidence of Mr Trist, para 57

⁴⁷ Stormwater Evidence of Mr Delagarza, para 40

⁴⁸ Stormwater Evidence of Mr Delagarza, para 44

⁴⁹ Stormwater Evidence of Mr Delagarza, para 51

⁵⁰ Infrastructure Evidence of Mr Trist, para 53-58

Land Suitability

Effects on Health of Land

- 82 A Preliminary Site Investigation (**PSI**) was completed August 2019 for the entire Bellgrove landholding (north and south) and was inclusive of the Site. The PSI concluded that the Site has been used for pasture and grazing dating back to dating back to 1941. Whilst the Site itself has not been used for been subject to Hazardous Activities and Industries List (**HAIL**) activities, the Environment Canterbury Listed Land Use Register (**LLUR**) identifies several nearby HAIL activities, with one HAIL activity, a sheep dip (HAIL A8), identified on the adjacent property north (Lot 1 DP 80275 - 521 Rangiora Woodend Road)⁵¹.
- 83 Ms Whitley's peer review of the PSI notes that the risk for contamination within the Site associated with the sheep dip on the adjacent property (HAIL H) cannot be ruled out, with near surface soils of paddocks adjacent to the sheep dip area potentially affected following sheep dipping activity. Despite this, she concludes that *any human health and environmental risk presented by the potential HAIL activities ...can be effectively mitigated/managed and would not prevent the sites suitability to undergo land use change or subdivision*⁵².

Geotechnical Considerations

- 84 A preliminary geotechnical assessment was undertaken for Bellgrove South in 2019 which indicated the predominant geotechnical engineering hazards were the potential for 'Mild to Moderate' seismically induced liquefaction; and the presence of variable thicknesses of organic/peaty soils in the southern portion of the site. The soils in the southern portion of the Site would be susceptible to long term consolidation settlement as a result of imparted loads, including the placement of engineered fill or foundations of proposed structures; and the presence of artesian (i.e., above existing ground surface) groundwater pressures identified⁵³.
- 85 Mr Kupec has considered the geotechnical engineering hazards and identifies a series of mitigation measures and solutions (including the use of surcharge and preloading prior to development, the use of suitable foundation design; and the use of geogrid reinforced soil fills to protect underground services)

⁵¹ Contaminated Land Evidence of Ms Whitley, para 19

⁵² Contaminated Land Evidence of Ms Whitley, para 30

⁵³ Geotechnical Evidence of Mr Kupec, para 20

which are considered standard industry solutions which can be readily implemented to address the hazards identified⁵⁴.

- 86 Mr Kupec concludes that *the site is geotechnically suitable for rezoning to RMZ and that the changes sought to the SER-ODP including the inclusion of the Additional Land and the location and extent of the stormwater reserve area are appropriate*⁵⁵.

Flooding Considerations

- 87 Mr Delagarza has undertaken a flood management assessment of the rezoning and MRZ-enabled development of the Site.

- 88 Councils' flood risk map indicates that majority of the Site is located within a "low" flooding hazard area for the modelled 200-year all flood hazard event. Further modelled results indicate there are only isolated areas of "medium" flood hazard within the Site⁵⁶. Further WDC Flood mapping and LiDAR contour information indicates that rainfall that falls onto the Site is drained southwards towards the open swale along Northbrook Road. The conveyance of this flow is via a series of existing of open farm drains which converge and discharge into the swale along Northbrook Road.⁵⁷

- 89 Mr Delagarza identifies the following flood management principles would apply during detailed design for development of the Site⁵⁸:

- (a) Offsite flood flows from the Cam /Ruataniwha River up to the 200-year ARI local and Ashley River breakout events contained within the Cam/Ruataniwha River and the adjacent green esplanade reserve proposed within the Site and the Additional Land. Should this not be possible, then some of the flood flows may be re-directed through the proposed roading network as part of the development design.
- (b) Local overland (secondary) flow paths up to the 50-year ARI would be directed via the roading network and swales to the development's SMA.

⁵⁴ Geotechnical Evidence of Mr Kupec, para 25

⁵⁵ Geotechnical Evidence of Mr Kupec, para 29

⁵⁶ Stormwater Evidence of Mr Delagarza, para 24

⁵⁷ Stormwater Evidence of Mr Delagarza, para 29

⁵⁸ Stormwater Evidence of Mr Delagarza, para 42

(c) Freeboard would be provided for the finished floor level of all structures as required by NZ Building Code and the WDC Engineering Code of Practice.

90 Overall Mr Delagarza concludes that there are multiple alternatives for managing overflow from the Cam/Ruataniwha River that do not adversely impact future residential development on the Site or the surrounding properties.⁵⁹

91 Based on this evidence, I consider flood risk can be appropriately managed at the subdivision consent stage and through appropriate design of landform and freeboard.

Effects on Soils and Agricultural Productivity

92 The soil classification and productivity of the land has been assessed to determine the impact of the rezoning on the productive potential of the Site. From a soil and LUC perspective, Mr Dunham has identified that the Site is a mixture of Land Use Classes 2s 2 and 3w 1 which brings it under the definition of 'highly productive land' under the NPS—HPL definition.

93 Regarding the Additional Land, Mr Dunham has considered this in isolation to consider how viable it would be for this to operate if it was to remain RLZ with the remainder of the Site rezoned MRZ. He notes that the LUC capability of the Additional Land is broadly the same as the remainder of Bellgrove South (50% LUC 2 and 50% LUC 3) but that soil permeability and drainage is slightly better⁶⁰.

94 Mr Dunham considers that on its own the Additional Land has three technically feasible options (dry stock sheep, dry stock cattle and the sale of hay and baleage) noting that mixed cropping is not feasible given the small land area. None of the land use options considered feasible generate an income to cover direct operating expenses⁶¹.

95 On this basis, the loss of productive rural land is not an impediment for the rezoning with Mr Dunham's evidence concluding that there is no reliable long

⁵⁹ Stormwater Evidence of Mr Delagarza, para 65

⁶⁰ Land Productivity Evidence of Mr Dunham, para 99.

⁶¹ Land Productivity Evidence of Mr Dunham, para 107.

term economically viable primary production land use for this Site, or for the Additional Land⁶².

Tāngata Whenua and Cultural Values

- 96 The Site is within the takiwā of Te Ngāi Tūāhuriri Rūnanga. Natural resources (water, mahinga kai, indigenous flora and fauna, cultural landscapes and land) are taonga to manawhenua, are integral to cultural identity and they have a kaitiaki responsibility to protect them.
- 97 The Cam / Ruataniwha River runs along the eastern boundary of the Additional Land and is identified as Ngā Wai in the pWDP. There are no silent files, statutory acknowledgement areas, wahi taonga, wahi tapu or other sites of significance to tāngata whenua as part of Bellgrove South.
- 98 However, recognising waterways and springs are present on the Site, any cultural significance of these will be addressed through the subdivision consent process and engagement with tāngata whenua as appropriate.

Ecology

- 99 The ecological evidence of Dr Tracy-Mines evaluates the ecological values and wetland habitats on the Site, assesses the ecological significance and fauna values against relevant policy, considers the potential impacts of the Proposal and makes recommendations for additional biodiversity gains.
- 100 There is historical evidence of wetlands in the southern part of the Site (towards Northbrook Road) and several old channels and shallow depressions are present in this area. Investigations found that depressions and boggy areas present in the south of the Site were not natural inland wetlands under the NPS-FM definition, and not considered wetlands under the CRPS or the pWDP definitions⁶³.
- 101 Vegetation present is highly modified reflecting that the Site is actively grazed and currently used as cultivated farmland. The land has been cleared of any remnant indigenous vegetation and planted/over sown with exotic pasture grasses. Majority of the vegetation indigenous species observed were located within the indigenous treeland along the Cam/Ruataniwha River.

⁶² Land Productivity Evidence of Mr Dunham, paras 27 and 33.

⁶³ Ecological Evidence of Dr Tracy Milne, para 94

- 102 Threatened and At Risk indigenous water birds use these southern areas seasonally, and indigenous eels are likely to be present in the farm drains⁶⁴.
- 103 Most of the Site has exotic vegetation cover with few ecological values and Dr Tracy-Mines concludes that rezoning the Site to MRZ is not anticipated to result in any significant adverse effects on the ecology of the Site⁶⁵.
- 104 Dr Tracy-Mine and her colleagues have reviewed the revised SER-ODP and identify several ecological benefits⁶⁶ including the increased provision of green space along the eastern boundary which has the potential to provide habitat for indigenous vegetation and fauna, the quantity of open space throughout the Site and the large 6.5ha stormwater reserve which provides opportunities for indigenous planting to contribute to habitats and ecological linkages for indigenous avifauna and invertebrates. The stormwater basins may also provide some benefits for wetland avifauna, depending on the design and amount of water retention.
- 105 In relation to the Additional Land, Dr Tracy-Mines does not identify any specific ecological features other than the Cam / Ruataniwha River (which is already subject to special provisions under the pWDP related to it being a Nga Wai Waterway (SASM 024); Scheduled Natural Character Freshwater Body (NC-SCHED2); and having a 20m wide esplanade reserve requirement). She concludes that rezoning the Site to MRZ (inclusive of the Additional Land) is not anticipated to result in any significant adverse effects on the ecology of the Site⁶⁷.
- 106 Dr Tracy-Mine recommends that waterways and springs on the Site be protected and enhanced with appropriate indigenous riparian planting and this will be addressed as part of detailed design in support of subdivision consent.
- 107 Based on the ecological evidence, the proposed *MRZ zoning of the Site and future development in accordance with the Bellgrove South ODP proposed for the Site, would result in at least no net loss of biodiversity, and most likely, a net gain for indigenous biodiversity*⁶⁸.

⁶⁴ Ecological Evidence of Dr Tracy Milne, para 101

⁶⁵ Ecological Evidence of Dr Tracy Milne, para 75

⁶⁶ Ecological Evidence of Dr Tracy Milne, paras 81-83

⁶⁷ Ecological Evidence of Dr Tracy Milne, para 75

⁶⁸ Ecological Evidence of Dr Tracy Milne, para 105

Reverse Sensitivity

- 108 The rezoning of the Site would enable the establishment of residential activity on land previously rural and this includes the introduction of new activities and effects associated with residential uses. This will result in neighbours' current rural outlook changing. This is inevitable when greenfield urban growth strategies are implemented.
- 109 I note that the Site has a limited number of rural boundaries as demonstrated by Figure 3 below, minimising the potential effect for reverse sensitivity from intensification. None of these properties are used for activities that are highly sensitive to residential activities (i.e., there is no intensive farming or silage operations); and it is only the boundary with the Additional Land that is not intended for future urbanisation.



Figure 3. Bellgrove South boundaries

- 110 The two boundaries not intended for urbanisation are those to the east of the Additional Land (479 Rangiora Road legally described as Lot 1 DP 452196 and 52 Northbrook Road legally described as Lot 2 DP 306045). The approximately 295m long boundary with 479 Rangiora Road and the Additional Land comprises the Ruataniwha / Cam River. Future development in accordance with the revised SER ODP and pWDP will result in the provision of a 20m wide

esplanade reserve providing an appropriate rural / residential interface and help mitigate any reverse sensitivity effects.

- 111 Along the approximately 245m Additional Land boundary with 52 Northbrook Road, the revised SER-ODP incorporates an extension to the open space reserve and a green link further south assisting to ensure green network around the perimeter of the Site would be created. Similarly, this would assist to ensure an appropriate interface and the reduction and mitigation of any reverse sensitivity effects.
- 112 Further there is not anticipated to be any reverse sensitivity effects on other surrounding land uses (i.e., existing residential land area to the west).

Effects Conclusion

- 113 The Site (including Additional Land) is a suitable location for greenfield rural residential growth given:
- a. It is located directly adjacent to an existing urban environment (immediately east of Rangiora) in an area earmarked for future residential development as early as 2007.
 - b. The soil within the Site is:
 - i. suitable for residential development from a geotechnical and contamination perspective, and
 - ii. is not subject to NPS-HPL restrictions.
 - c. The Site has good internal and external transportation connections across multiple modes (vehicle, bicycle and walking).
 - d. The Site is capable of being served by infrastructure required for residential development.
 - e. Development of the Site will:
 - i. Enable a variety of homes that meet the needs of different households in the District, and will
 - ii. achieve good internal and external urban form outcomes;
- 114 Development of the Site will not:
- a. cause significant loss of rural landscape character or adverse visual effects,

- b. cause loss of heritage or cultural values, and
- c. cause loss of significant ecological values.

115 On the basis of the above conclusions, I consider that any potential adverse effects of the Proposal are able to be appropriately avoided or mitigated.

RELEVANT PLANNING PROVISIONS

116 The key matters to be considered in assessing the request to rezone the Site fall into two broad groups. The first is effects of the activities enabled by that relief on the environment (considered above), and the second is alignment with higher order statutory directions.⁶⁹

117 Sections 31 – 32 and 72 – 76 of the RMA provide the core framework for preparing or changing district plans with the key framework outlined in **Attachment 9**.

118 In relation to the higher order statutory directions, I note that urban growth and development in Greater Christchurch is covered and provided for by Chapter 6, CRPS . Where the CRPS largely gives effect to the NPS-UD (for example the incorporation of the housing bottom lines in accordance with Clause 3.6 of the NPS-UD at Objective 6.2.1a), there is no need to have recourse to the NPS-UD being the higher order policy document.

119 However, where the NPS-UD has not been given full effect to by the CRPS (as is the case with objectives and policies related to unanticipated and out-of-sequence developments or 'responsive planning' such as the criteria directed by clause 3.8(3)) then I consider there is a need to have recourse to the NPS-UD, which in that case should also be given more weight. This is relevant to the rezoning sought (given rezoning as opposed to the notified or revised certification provisions) given it represents the most responsive approach for releasing land for urban development and removes any ambiguity about whether or not the land is 'plan-enabled', best giving effect to the provisions of the NPS-UD. It is also of particular relevance to the Additional Land which is discussed separately below.

⁶⁹ RMA, s5(2)(c), s32(1), s74(1), s75(3), s76(3).

National Policy Statements

120 Under RMA s 75(3) a District Plan must give effect to a National Planning Standard.

NPS-UD

121 The most important NPS relating to the request to rezone the Site is the NPS-UD which aims to remove barriers to the supply of land and infrastructure and make room for growth in a structured and integrated way. It applies to all planning decisions that affect an urban environment⁷⁰ and requires WDC, as a Tier 1 local authority, to 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.⁷¹ This is directly applicable to the Site and I refer to my assessment of the NPS-UD in **Attachment 7**, which concludes that the rezoning and revised SER-ODP would:

- a. contribute to a well-functioning urban environment (well-integrated with Rangiora) (Objective 1 and Policy 1),
- b. improve housing affordability and provide additional capacity to meet demand helping support competitive land and development markets in the District and wider region (Objective 2 and Policy 2);
- c. result in more people being located in the Rangiora urban environment where there is high demand for housing and in a location well served by existing public transport and within less than 2km from the Rangiora Town Centre and General Industrial Zone (Objective 3);
- d. result in a departure from what would up to now be considered a 'normal' or traditional and familiar residential development for Rangiora and this difference (greater residential density) may create an effect some would consider to be adverse but is acknowledged as part of the developmental and change that will occur as urban environments respond to diverse and changing needs of people, communities, and future generations (Objective 4);

⁷⁰ Urban Environment is defined in the NPS-UD as any area of land that is, or is intended to be, predominantly urban in character; and is, or is intended to be, part of a housing and labour market of at least 10,000 people.

⁷¹ Policy 2, NPS-UD

- e. would generally occur in accordance with regional planning documents which identify the Site for future urban development and have been prepared taking into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi) (Objective 5 and Policy 9);
- f. enable future development of the Site to be effectively integrated with infrastructure planning, funding and delivery and the inclusion of the Additional Land would result in the supply of additional residential lots considered to provide significant development capacity (Objective 6 and Policy 10);
- g. help plug a pending gap in feasible capacity by providing quality, master-planned housing that is in step with market demand and able to be realised at both pace and scale (Objective 7);
- h. assist in encouraging alternative transport modes that support reductions in greenhouse gas emissions through the location of the Site in proximity to the Rangiora Town Centre and public transport, along with the provision of a well-integrated network of pedestrian and cycle paths (Objective 8);
- i. generally gives effect to the planned urban built form anticipated by RMA planning documents including Our Space, the CRPS, and the GCSP (Policy 6(a)); and
- j. would add significant development capacity and contribute to a well-functioning urban environment (this includes the Additional Land) (Policy 8).

122 Overall, I consider the rezoning consistent with the NPS UD and will help fulfil its purpose of achieving high quality, well-functioning urban environments in a manner that will contribute to housing affordability in New Zealand.

NPS-FM

123 I consider that stormwater and wastewater discharges will be dealt with at subdivision and no practices or effects are anticipated that would be inconsistent with the NPS-FM.

124 Whilst the ecological site investigations identified the presence of some wetlands throughout the south of the site, they are predominantly vegetated

with ryegrass and other pasture species and are therefore not considered to be 'natural inland wetlands' under the NPS-FM⁷².

NPS-HPL

- 125 The NPS-HPL came into force October 2022 and clause 3.5(1) specifies that as soon as practicable, and no later than 3 years after the commencement date, every regional council must, using a process in Schedule 1 of the Act, notify in a proposed regional policy statement, by way of maps, all the land in its region that is required by clause 3.4 to be mapped as highly productive land.
- 126 The Site (except for the Additional Land) is identified for future urban development and as a result is not deemed highly productive land under the NPS-HPL (Cl. 3.5(7)(b)(i)).
- 127 In the pWDP, the Site is zoned RLZ and as such it is considered that the site (currently zoned rural in the operative WDP) is subject to a Council initiated change to rezone it from general rural to rural lifestyle and therefore the NPS-HPL does not apply (Cl. 3.5(7)(b)(ii)).

NPS-IB

- 128 The NPS-IB came into force 4 August 2023. It provides direction identifying significant natural areas and manage the adverse effects of new activities on them to maintain indigenous biodiversity across Aotearoa New Zealand so that there is at least no overall loss in indigenous biodiversity.
- 129 Dr Tracy Mines ecological evidence prepared for this Site has determined that the rezoning proposal is well-aligned with the NPS-IB, and that future development of the Site in accordance with the revised SER-ODP will give effect to the NPS-IB⁷³.

National Environmental Standards

- 130 The following National Environmental Standards (**NES**) are relevant to this rezoning request:

⁷² Ecological Evidence of Dr Tracy-Mines, para 94

⁷³ Ecological Evidence of Dr Tracy-Mines, para 105

Sources of Human Drinking Water

- 131 Water supply will be to the reticulated WDC network in accordance with the drinking water requirements, with new water mains proposed to be established in alignment with the primary roading network.

Assessing and Managing Contaminations in Soil to Protect Human Health

- 132 As a request for a zone change, and not a request for a determination on a detailed subdivision and use of the site, the NESCS does not strictly apply. The requirements of the NESCS will be addressed at any subsequent subdivision or building consent stage.
- 133 Further the contaminated land evidence prepared for the Site concludes that the from a contaminated land perspective the site is suitable for residential rezoning and subsequent subdivision⁷⁴.

Freshwater

- 134 The National Environmental Standards for Freshwater (NES-FW) provide restrictions on activities that pose risks to freshwater and freshwater ecosystems. Some activities they manage include protecting natural inland wetlands, rural streams from in-filling and ensuring connectivity of fish habitat (fish passage).
- 135 Dr Tracy-Mines evidence has confirmed that the ecological site survey did not identify any natural inland wetlands under the NPS-FW definition⁷⁵ and the NES-FW regulations relating to wetlands therefore do not apply.
- 136 Based on investigations undertaken to date regarding the farm drains on Site the NES-FW regulations relating to rivers may apply. Should this be the case, then the requirements of the NES-FW will be addressed at subsequent subdivision and resource consent stage.

Regional Policy Statement and Plans

- 137 Under RMA s 75(3) a District Plan must give effect to a regional policy statement and under s75(4) must also not be in inconsistent with a regional plan.

⁷⁴ Contaminated Land Evidence of Ms Whitley, para 30

⁷⁵ Ecological Evidence of Dr Tracy-Mines, para 94

CRPS

- 138 The Canterbury Regional Policy Statement (**CRPS**) sets out the objectives, policies and methods to resolve those resource management issues in Canterbury. Chapter 5 (Land Use and Infrastructure), Chapter 6 (Recovery and Rebuilding of Greater Christchurch) and Chapter 11 (Natural Hazards) are the most relevant to this rezoning. My assessment of the Proposal against these provisions is contained in **Attachment 8** and summarised below. For completeness, I record my view that the Proposal is either consistent with, or not engaged by, the remaining chapters of the CRPS.
- 139 Chapter 5 of the CRPS seeks to encourage sustainable high quality urban design in appropriate locations, which ensures that adverse effects of urban development (including value of land for urban uses and reduced amenity values) can be avoided, remedied or mitigated. It also seeks to manage urban growth and development in ways that support existing urban areas and integrate with transport networks. While Chapter 5 applies to the entire region only two provisions apply to Greater Christchurch and, the CRPS states that that many issues associated with urban development tend to be concentrated in the Greater Christchurch area. For this reason the corresponding provisions are set out in Chapter 6 and take precedence.
- 140 While the Site is not within an identified 'Greenfield Priority Area' of Map A of the CRPS it is (except for the Additional Land) located within a FDA. Policy 6.3.12 'Future Development Areas' is of most relevance to this rezoning given it sets out circumstances where new residential development is to be provided for and enabled within the FDA's. Except for the Additional Land, which is discussed separately below at paragraphs 169-220, I consider the Proposal will give effect to Policy 6.3.12 as it:
- (a) assists the District in responding to a widespread shortage of feasible housing capacity to meet demand (1)⁷⁶.
 - (b) is in accordance with Objectives 6.2.1 and 6.2.2 and the related policies as outlined above (2):

⁷⁶ Economic Evidence of Mr Colegrave, para 16

- i. the Site will support the existing identified Key Activity Centre of Rangiora⁷⁷ (6.2.1 (2)), and is located less than 2km from the Rangiora Town Centre⁷⁸;
- ii. the Site does not contain any outstanding natural features or landscapes (6.2.1 (4)), and it's rezoning will not adversely impact any outstanding natural features or landscapes;
- iii. the rezoning will enhance the provision of public space within Eastern Rangiora with approximately 6.5 ha stormwater reserve area being provide for within the Site in accordance with the revised SER-ODP (6.2.1 (5));
- iv. the Site (except for the Additional Land) is in accordance with 6.2.1 (3) given the Site (excluding Additional Land) is located within an identified FUDA and thus its urban development is provided for by Policy 6.3.12 in the CRPS;
- v. indigenous biodiversity is protected and enhanced⁷⁹ (6.2.1 (5));
- vi. the quantity and quality of water in groundwater aquifers and surface waterbodies will be at a minimum maintained, with the proposed stormwater management system comprising a series of first flush and attenuation basins and a wetland anticipated to result in improved surface water quality⁸⁰ (6.2.1 (6));
- vii. the character and amenity of the adjacent rural area will be maintained by appropriate boundary treatment and integration can be provided at the residential / rural boundary interface within the SER-DA (6.2.1 (7));
- viii. the Site is set back approximately 8 km from the coast, with the effects of sea-level rise limited. Natural hazards (flooding and liquefaction) will be appropriately mitigated as part of subdivision design and development with Mr Delagarza noting that future development can be designed to ensure flood water moves through the Site without adversely impacting future residential

⁷⁷ Economic Evidence of Mr Colegrove, para 83

⁷⁸ Transport Evidence of Mr Collins, para 29

⁷⁹ Ecological evidence of Dr Tracy-Mines para 96.

⁸⁰ Stormwater evidence Mr Delagarza, para 51.

- development or surrounding properties⁸¹ and Mr Kupec outlining a range of mitigation measures and solutions appropriate to address the geotechnical hazards identified⁸² (6.2.1 (8));
- ix. development will not adversely affect the efficient operation, use, development, appropriate upgrade, and future planning of strategic infrastructure and freight hubs ⁸³⁸⁴ (6.2.1 (10)) and will optimise the use of existing infrastructure (6.2.1 (11))⁸⁵;
 - x. MRZ will enable higher density living environments to be established (6.2.2 (2)) and provision will be made for a greater range of lot sizes than previously experienced by Rangiora providing for a greater range of housing typology; and
 - xi. development is considered sustainable and self-sufficient growth of Rangiora Town (6.2.2 (5)).
- (c) appropriately aligned and sequenced with the development of planned upgrades to existing or establishment of new infrastructure (3) and will occur in general accordance with an ODP (the revised SER-ODP) developed in accordance with the requirements of Policy 6.3.3.
 - (d) in accordance with all the circumstances listed in Policy 6.3.11 (5). Whilst the Rangiora Eastern Link is not yet operational, as outlined in the evidence of Mr Collins future development of the Site can be staged appropriately in accordance with the establishment of the Rangiora Eastern Link giving effect to Policy 6.3.11(5)(a).
 - (e) Potential flooding, overland flows and geotechnical hazards can be appropriately managed and mitigated through engineering design and assessment undertaken at the subdivision consent stage to ensure effects of natural hazards are avoided or appropriately mitigated in accordance with Policy 6.3.12 (6) as detailed in the evidence of Mr Delagarza⁸⁶ and Mr Kupec⁸⁷.

⁸¹ Stormwater Evidence Mr Delagarza, para 65.

⁸² Geotechnical Evidence of Mr Kupec, para 25

⁸³ Transport Evidence of Mr Collins, para 100

⁸⁴ Infrastructure Evidence of Mr Trist.

⁸⁵ For example, water supply will be provided from the existing Council water mains located in Kippenberger Avenue, Devlin Avenue and Northbrook Road (Infrastructure Evidence of Mr Trist, para 39).

⁸⁶ Stormwater and Flooding Evidence of Mr Delagarza, para 65

⁸⁷ Geotechnical Evidence of Mr Kupec, para 30

- 141 Overall, the Proposal is consistent with the relevant objectives and policies of Chapter 5, 6 and 11 of the CRPS. The Site is adjacent to the existing urban area of Rangiora and the Site (excluding the Additional Land) is located within a FDA and explicitly provided by Policy 6.3.12 (3). The Proposal represents a logical urban expansion, enabling residential medium density development in accordance with the associated revised SER-DOP and would achieve a well-designed residential development providing a range of residential densities with sufficient infrastructure, servicing, and transportation connections, providing appropriate connections to both the existing and future residential environment of Rangiora. The rezoning would avoid or mitigate any resulting adverse effects that may arise, including effects on servicing, infrastructure, and the wider transport network.
- 142 The incorporation of good urban design in future development is enabled by the revised SER-ODP, the detail of which will be assessed through the subdivision and land use consent stage.

Regional Plans

- 143 Under s75(4)(b) of the RMA, the District Plan cannot be inconsistent with a regional plan, which in respect of this application, includes the Land and Water Regional Plan (**LWRP**)
- 144 In general, the effects associated with requirements under the LWRP can be considered at the time of detailed development, especially noting that the site can be serviced for water and stormwater as detailed in Mr Trist's and Mr Delagarza's evidence.
- 145 I note that the Site is located within the Ashley Groundwater allocation zone of the CLWRP. Correspondence with ECan has confirmed that the Ashley Zone is currently within its allocation limit at 88.27% allocated⁸⁸. As a result, the general rules with respect to takes and uses of groundwater are rules 5.128-5.132 of the CLWRP which prohibit a "take and use" consent from being granted in over-allocated groundwater zones will not apply.

⁸⁸ Email correspondence from Cherie-Lynn Lewis (Environment Canterbury) with Nick Beattie (Aurecon) 8 April 2024 confirming that the allocation limit of the Ashley Groundwater Zone is 15,400,000 m³/yr and that currently 13,593,820 m³/yr is allocated (representing an allocation rate of 88.27 %).

146 On this basis, the proposed zoning of the site to MRZ is not inconsistent with the LWRP.

pWDP

147 The pWDP policy framework and associated provisions are still subject to examination and testing through the submission and hearing process. Regardless, I have considered the notified Strategic Directions chapter of the pWDP with the following key points noted:

- (a) Rezoning the Site to MRZ is anticipated to provide for 363 residential lot (or 335 if the Additional Land is excluded), contributing to achieving the identified household bottom lines. Similarly, the rezoned land would enable densities of more than 15 households per hectare to be achieved in accordance with UFD-P1.
- (b) Except for the Additional Land, the Site has been identified as a location for residential development in the GCSP (the FDS) and as a result gives effect to UFD-P2.
- (c) Additional assessment is contained within Table 1 of **Attachment 6**.

148 Overall, I conclude that the Proposal aligns with the Strategic Directions as follows:

- (a) It is likely to result in a net gain in indigenous biodiversity⁸⁹ (SD-01 (1)).
- (b) The natural character of freshwater bodies (including the Cam / Ruuataniwha River and the spring on the eastern boundary) will be preserved and enhanced through the establishment of appropriate riparian margins and/or setbacks (SD-01 (2)).
- (c) The Site does not contain outstanding natural features or landscapes (SD-01 (3)).
- (d) The rezoning and revised SER-ODP provides increased public access to open space and riparian margins (specifically to the Cam / Ruataniwha River) (SD-01 (4)).
- (e) The rezoning and urbanisation of the Site can result in a well-functioning urban environment in Eastern Rangiora (SD-02) that is well

⁸⁹ Ecological Evidence of Dr Tracy-Mines, para 96

integrated with the existing urban areas of Rangiora located to the west (SD-03 (1)). It will also enable development to occur in a location long earmarked for urban growth in the higher order planning documents and spatial plans.

- (f) Development of the Site would utilise and or provide the necessary updates to the WDC's reticulated wastewater system, and potable water supply and stormwater infrastructure (SD-03 (3)).
- (g) Land use and water resources are managed in an integrated manner (SD-01 (5)).
- (h) The revised SER-ODP will facilitate a new residential area with good levels of amenity, including a large area of open space (SD-03 (7)).
- (i) The rezoning provides for a range of housing opportunities and section sizes and helps to focus residential development within the existing Rangiora urban centre (SD-03 (5)).
- (j) Provides for multi-modal connectivity through a safe and efficient transport network in accordance with the revised SER-ODP (SD-03 (1)).
- (k) Whilst the area of Additional Land is not identified as a future development area, SD-05 does not give effect to the NPS-UD Policy 8 regarding the concept of responsive planning. As discussed below, I consider that rezoning the area of Additional Land would more effectively give effect to the NPS-UD. If the land is to remain 'rural' then its ability to support productive activities would likely be restricted by its size, location adjacent to medium density housing, and limited access through an urban area (limiting its ability to give effect to SD-05).
- (l) The Site is not within an area exposed to an unacceptable risk of natural hazards, with flood risk and liquefaction risk able to be effectively mitigated (SD-07).

149 I have also reviewed the associated policies that support these objectives. I record that I have reached the same conclusion as above, and consider the rezoning is generally consistent with the supporting policies.

Iwi Management Plan

- 150 The Mahaanui Iwi Management Plan (**IMP**) is an expression of kaitiakitanga sets out how to achieve the 'protection of natural and physical resources according to Ngai Tahu values, knowledge and practices and identifies a number of issues and associated policies, including subdivision and development guidelines.
- 151 Section 5.3 Wai Māori of the IMP addresses objectives and policies for freshwater and provides guidance to freshwater management in a manner consistent with Ngai Tahu cultural values and interests. It is recognised that Ngai Tahu and Rūnunga have interests and relationships with freshwater resources. The Site will obtain water supply from the WDC's reticulated network and existing natural springs and waterways (where applicable) will remain protected through the pWDP provisions (specifically Table NATC-1 which specifies minimum setbacks from freshwater bodies). The provision of esplanade reserve and green space adjacent the Cam / Ruataniwha River will ensure an appropriate riparian margin is achieved. All stormwater runoff will be conveyed by WDC's reticulated stormwater network to the stormwater management area identified within the revised SER-ODP for treatment and detention before being discharged. There will be no effluent discharges to ground or waterways, with the Site able to connect to the WDC reticulated wastewater network. It is considered that the application is consistent with the Wai Māori section of the IMP.
- 152 Section 5.4 Papatūānuku addresses objectives and policies of issues of significance in regard to the land, recognising the relationships and connections between land, water, biodiversity and the sea. Within the Site the Cam/Ruataniwha River and its tributaries has been identified and included as a Site and areas of significant to Māori (SASM) (#24 – Ngā Wa) a part of the pWDP. The provisions of the NATC (Natural Character of Freshwater Bodies) and the SASM (Sites and Areas of Significance to Māori), along with the identification of the Cam/Ruataniwha River on the SER-ODP with appropriate esplanade reserve, and setback provision will ensure that the potential effects involved with changing the land use on the Cam/Ruataniwha River are appropriately assessed and considered as part of any future subdivision and land use consent.

153 Section 6.4 Waimakariri addresses issues of particular significance to the lands and water of the Waimakariri catchment. Issues around water quality and quantity and the potential effects of subdivision and development are relevant considerations as part of the rezoning of land in Rangiora. The issues and policies focus on discharges to surface water, discharges to groundwater, subdivision and development, and cultural landscapes. The rezoning of the Site and any future subdivision development will manage and mitigate any potential effects on groundwater, on surface water, and reduce any potential effects on the environment and the cultural values of the wider area. The Site will connect to existing WDC infrastructure services, and as a result any potential discharge of contaminants will be controlled and treated. This will minimise the adverse effects of waterways and groundwater.

Overall

154 The proposed change of zoning from proposed RLZ to MRZ is considered to have less than minor adverse effects on the natural and cultural environment and is considered to be consistent with the provisions of the IMP.

Any relevant management plans and strategies

Greater Christchurch Spatial Plan

155 On 16 February 2024 the Greater Christchurch Partnership Committee endorsed the GCSP and in March all Partner Councils adopted the GCSP as their Future Development Strategy (**FDS**) for the purposes of the NPS-UD. As with Map A of the CRPS, the Site (excluding Additional Land) is located within a FDA (refer Figure 4N, **Attachment 4**).

156 The GCSP notes in relation to greenfield development that *"the creation of 'greenfield' areas will continue to be part of how we accommodate more people so that we can provide a range of lifestyle choices that our communities' value. The focus of our spatial plan and greenfield development, is to encourage positive change in our urban form and function, recognising that while housing capacity needs to be provided, this must achieve and not undermine other directions and principles.*

To achieve this, successful future greenfield development needs to:

1. Be well connected with employment, services and leisure through public and active transport networks

2. Be integrated with existing urban areas

3. Meet a need identified by the latest Housing and Business Development Capacity Assessment

4. Be at the right scale, density and location to minimise impact on highly productive land and existing permitted or consented primary production activities⁹⁰.

157 Whilst the Alternative Land is not identified for development within the GCSP, it can be appropriately integrated with the existing and future Rangiora urban area and is well connected.

Waimakariri 2048 – District Development Strategy

158 The 2018 Waimakariri District Development Strategy 'Our District, Our Future – Waimakariri 2048' (**WDDS**), guides the District's anticipated residential and business growth over the next 30 years. It identifies a need for an additional 17 hectares of additional retail/commercial land in Rangiora and Kaiapoi 91 and identifies eastern Rangiora as an area for future greenfield growth (Figure 4E, **Attachment 4**). The WDDS notes that focusing majority of greenfield growth to the east of Rangiora will better position Rangiora town centre in the middle of the overall settlement pattern, and ensure new residential land is in proximity to existing and proposed community facilities in the east⁹².

Our Space 2018-2048 – Greater Christchurch Settlement Pattern Update Whakahāngai O Te Hōrapa Nohoanga.

159 South East Rangiora is identified in Our Space as an area for future residential development (Figure 4G, **Attachment 4**).

Summary

160 Overall, this rezoning request is considered in accordance with the urban growth outcomes sought in the GCSP, the WDDS and Our Space.

⁹⁰ GCSP, p.72

⁹¹ WDDS, p. 5

⁹² WDDS, p. 19

PART 2 MATTERS

- 161 In addition, to the above statutory documentation, a District Plan must give effect to Part 2 of the Act.
- 162 There are several matters of National Importance that are relevant and need to be recognised and provided for under Section 6:
- 163 In relation to Section 6(h) I consider that the mitigation and avoidance measures in technical evidence of Mr Delagarza adequately recognizes and provides for flood hazard risk and the evidence of Mr Kupec provides for liquefaction risk.
- 164 Section 6(e) the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga is relevant. Cam / Ruataniwha River is identified in the pWDP as being Nga Wai. The incorporation of a green link and open space reserve (6(d) along with the provisions relating to esplanade reserve provision and waterway setbacks in the pWDP will ensure that the natural character and cultural values of the Cam / Ruataniwha River and cultural values are protected from inappropriate subdivision and development (6(a)).
- 165 There are two clauses in Section 7 that I consider the Panel should have particular regard to. Section 7(b), the efficient use and development of natural and physical resources, is I believe a relevant consideration because the zoning change sought would result in a more efficient use of the land appropriately located directly adjacent to Rangiora in a location identified in the higher order planning documents for residential development.
- 166 Section 7(c), the maintenance and enhancement of amenity values, is also a matter the Panel may want to have particular regard to as the proposed rezoning will change the character of the local area. Mr Milne notes that the *proposed landscape treatment along the residential boundary interface with the Cam/Ruataniwha River esplanade and reserve area, coupled with built form setbacks* are considered an appropriate response to this sensitive interface⁹³.

S32AA EVALUATION

- 167 A Section 32 Assessment was not included in the submission seeking that the Site be rezoned to MRZ, and I have undertaken the required assessments and

⁹³ Landscape and Visual Character Evidence of Mr Milne, para 13.

included it in my evidence as **Attachment 6**. I have concluded from the assessment that the submission to re-zone the Site from RLZ to MRZ is the most appropriate method for achieving the purpose of the RMA, compared to the other alternatives considered above.

168 I have not included a Section 32 Assessment related to the rezoning of Bellgrove North to MRZ, given this has been completed by WDC as part of Variation 1, except to note my general support of this assessment.

INCLUSION OF THE ADDITIONAL LAND

169 The following evidence largely comprises that contained within my evidence prepared for Hearing Stream 10A 'Future Development Areas' and relates solely to the inclusion of the Additional Land within the SER-DA, SER-ODP and the area of Bellgrove South sought to be rezoned MRZ.

170 Lot 2 DP 452196 is a 14.2ha lot owned by Bellgrove (Record of Title 577722). The title was issued 13 July 2012, following the parent 20.10 ha allotment (Lot 2 DP 80275, CB45D/1257), which extended north to Rangiora Woodend Road, being split in two at the Cam / Ruataniwha River boundary as demonstrated in Figures 5A and 5B at **Attachment 5**. I understand that the full extent of Lot 2 DP 452196 has historically been farmed for rural land use purposes alongside the other Bellgrove South land holdings (Lot 2 DP 394668 at 15 Kippenberger Avenue and Lot 2 DP 12090).

171 The pWDP excludes the full extent of Lot 2 DP 452196 from the SER DA and consequentially the SER ODP, as does Map A in the CRPS (Figure 4G, **Attachment 4**), leaving approximately 3.3ha of the lot (the Additional Land) as RLZ.

172 This effectively severs the 14 ha lot, rendering approximately 3.3ha outside of the FDA. This appears to my observation to be a unique situation and it is appropriate to firstly look at the contextual planning history behind this mapping outcome.

173 I understand the BRL landholding has been earmarked for future residential development as early as 2007 when it was identified as an Indicative Growth Area in the Greater Christchurch Urban Development Strategy and Action Plan

(UDS). Since then, progressive updates to the relevant planning frameworks of both WDC and ECan have further supported and reinforced the anticipated future urbanisation of the area in response to earthquake recovery initiatives and housing supply shortages. Most recently, the pWDP has generally included the land within two FDA's for greenfield residential growth in accordance with an ODP and a certification process that would, for development purposes, effectively convert the land from RLZ to a Residential Zone.

174 In 2007 the UDS established the broad settlement pattern for Greater Christchurch for the next 35 years, identifying future growth opportunities, with East Rangiora identified as an Indicative Growth Area (Figure 4A, **Attachment 4**). The UDS area did not include a specific growth boundary, simply identifying the Indicative Growth Area in East Rangiora as a dot on the plan.

175 To implement the UDS, Proposed Change 1 to the CRPS (1998) was notified in July 2007, amending the CRPS to reflect the settlement pattern promoted by the UDS. This formally identified urban limits proposed for Rangiora (refer Figure 4C, **Attachment 4**) and introduced the Projected Infrastructure Boundary (**PIB**) line to Greater Christchurch (via Map 1). Whilst the rationale is not clear, this appears to be at the point that the land in question was 'severed' by a mapping representation that did not follow the existing cadastral boundaries. This is despite text included under Policy 1 'Urban Limits' of the notified PC1 (2007) stating that *the urban limits shown on Map 1 have been defined at property boundary scale although changes may occur through the ODP and change of zoning in the district plan processes as set out in Policy 8*⁹⁴.

176 I consider that the severance of a property through a mapping exercise is not defining urban limits "at property boundary scale", and remain unsure why the cadastral boundaries were not followed in the preparation of Map 1 and the PIB, or how the dot in the UDS became a fixed urban limit at East Rangiora.

177 Policy 8 (PC1, 2007) outlined the mechanism for introducing Outline Development Plans for these areas and what these needed to cover, with the following explanatory text:

⁹⁴ Proposed Change No.1 to the Regional Policy Statement (July 2007), p. 10

Outline Development Plans...also provide the mechanism for achieving the type and form of development necessary to accommodate urban growth in a sustainable way. In addition these plans help to provide certainty for the community, developers, networks utilities providers and territorial authorities and that all constraints associated with the development of an area are investigated, addressed or protected at the time of initial urban zoning.

- 178 It appears from this text that the intent was that the urban limits, whilst intended to be a hard line for statutory planning and growth policies, were to have their finer grain detail worked through later when ODP's were developed through district plan processes. It would therefore follow that it is appropriate that this detail be considered in the development of the SER ODP and as part of the pWDP.
- 179 The East Rangiora Structure Plan prepared in 2009 (Figure 4C at **Attachment 4**) simply adopted the PIB already set out by proposed PC1 to the CRPS with the document noting that the area *reflects the urban limits outlined in Proposed Change 1 to the Regional Policy Statement. Proposed Change 1 was publicly notified by Environment Canterbury (ECan) in July 2007⁹⁵*. Again, no explanatory text is provided within the Structure Plan as to why cadastral boundaries were not followed.
- 180 It is worth noting that the East Rangiora Structure Plan explains that *an adopted structure plan is not indented to be a blueprint for development. The structure plan retains flexibility. The Waimakariri District council acknowledges that in the likely course of time and specific design studies, differing and improved alternatives are likely to become available that may result development proposals that differ from the adopted structure plan. It is expected that any structure plan will be reviewed as necessary to take account of any relevant policy initiatives, community aspirations and changes to infrastructure provision.*⁹⁶
- 181 I note that no such review of the Structure Plan appears to have taken place (except for the creation of the notified ODP's in the pWDP which effectively

⁹⁵ Completed East Rangiora Structure Plan (August 2009), p. 2

⁹⁶ East Rangiora Structure Plan, WDC, p. 7

supersede the former Structure Plans) and it is therefore appropriate that the Additional Land be considered as part of this District Plan Review.

- 182 In 2013 the Land Use Recovery Plan (**LURP**) was prepared under the Canterbury Earthquake Recovery Act 2011 to provide for residential and business land use to support recovery and rebuilding to 2028. The LURP identified greenfield land to ensure sufficient provision for urban development through to 2028 and took effect December 2013. Given the LURP focused on land development outcomes to 2028 (and not the longer term 2041 settlement pattern envisaged as part of the earlier Proposed Change 1 to the CRPS process), the Bellgrove landholdings were not included within a Greenfield Priority Area in Map A. The LURP did, however, identify the general Bellgrove landholdings and wider NER DA and SER DA areas within the PIB, which indicated the planned extent of urban development at Rangiora from 2028 to 2041 (Figure 4D, **Attachment 4**).
- 183 Substantial changes were then made to the CRPS in December 2013 to give effect to the LURP. The changes included the insertion of a new Chapter 6 'Recovery and Rebuilding of Greater Christchurch' and Map A 'Greenfield Priority Areas'. Map A illustrated the LURP settlement pattern for Greater Christchurch to 2028, identifying Greenfield Priority Areas for business and residential development. Consistent with the LURP, the NER DA and SER DA were included within the PIB of Rangiora.
- 184 The 2019 Our Space 2018-2048 Greater Christchurch Settlement Pattern Update (Our Space) built on the UDS of 2007, noting the land use changes which occurred following the Canterbury earthquake sequence, and identifying how Greater Christchurch could accommodate a further 150,000 people by 2048. Our Space was prepared to satisfy the requirement to produce a future development strategy, outlined in the National Policy Statement on Urban Development Capacity 2016.
- 185 Our Space identifies Greater Christchurch Future Development Areas (FDA's), and includes Eastern Rangiora (Figure 4F at **Attachment 4**). It requires FDA's to be incorporated into the CRPS and rezoned for urban development in the respective district plans where there is a projected shortfall in housing development capacity, enabling the territorial authorities to respond to changes in the sufficiency of development capacity over the medium term. Our

Space directs WDC to undertake structure planning for the FDA's as part of the review of its district plan.

- 186 The Hearings Panel Recommendations Report on Our Space confirms that the Bellgrove Family Trust submitted on Our Space and sought to change the Projected Infrastructure Boundary to follow cadastral boundaries at the time⁹⁷. The response was that "*Officers have generally recommended that additional land is best considered as part of subsequent RMA planning processes, including review of the Canterbury Regional Policy Statement and district plans, and relevant LGA process, including structure planning. It is proposed that a change to Chapter 6 of the Canterbury Regional Policy Statement be progressed using the streamlined planning process under the RMA, to ensure that future development areas necessary to meet development capacity needs can be rezoned as part of the upcoming district plan reviews.*" Once again, this indicates that it is within a District Plan Review process that this detail be best considered or through a review of the CRPS (noting that this has been unable to take place given delays to the scheduled notification of changes to the CRPS). Overall, my understanding is that since the original 2007 PIB was notified there has been no opportunity to modify the boundary line of the SER DA to reflect cadastral boundaries as originally intended and to address the anomaly where 3.3ha of BRL's almost 100ha total landholding is excluded from a long-established urban growth pattern in East Rangiora.
- 187 Change 1 to Chapter 6 of the CRPS was made operative July 2021. It implements Our Space. It identifies the FDA's on Map A (consistent with Our Space, including the NER and SER), inserted associated policy provisions through Policy 6.3.12, and made consequential changes to objectives, policies, text and definitions within Chapter 6 (Figure 4G, **Attachment 4**).
- 188 Subsequent to this, the pWDP was notified in September 2021 identifying the NER DA and SER DA (Figures 4H and 4I, respectively, **Attachment 4**).
- 189 Since the notification of the pWDP BRL has continued to show commitment to meeting the demand for housing in the Waimakariri District. Noting the delays to the District Plan Review process and the increasing need for additional

⁹⁷ <https://www.greaterchristchurch.org.nz/assets/Documents/greaterchristchurch/Our-Space-Hearings/Hearings-Panel-Recommendations-Report-FINAL-COLLATED-5-June-2019.pdf>, p. 64

housing supply, BRL sought approval for 198 residential lots within Stage 1 of Bellgrove North under the COVID-19 Recovery (Fast-track Consenting) Act 2020, which was approved 29 June 2022 (Figures 4J and 4M, **Attachment 4**). Work has subsequently continued with titles issued for Stages 1A, 1B and 1C. Titles are currently being worked through for Stage 1D (all civil works complete). I understand that it is also BRL's intention to apply for subdivision consent for Stages 2-5 (the remainder of Bellgrove North) with WDC during Quarter 3 of 2024.

190 BRL's commitment is further demonstrated by the funding agreements secured under the Government's Infrastructure Acceleration Fund (**IAF**) initiative as part of the Housing Acceleration Fund (announced in March 2021). The IAF agreements for the Bellgrove development are:

- (a) IAF Funding Agreement between Kainga Ora and WDC (11 October 2022); and
- (b) IAF Housing Outcomes Agreement between Kainga Ora, WDC and Bellgrove (11 October 2022)

191 The Funding Agreement commits Kainga Ora to pay \$5.7 million to WDC for transport and three waters projects that have the capacity and can enable the delivery of 1,300 affordable and market homes within the Bellgrove development.

192 The Housing Outcomes Agreement commits Bellgrove to provide a total of 1,300 dwellings in aggregate across the entire Bellgrove North and Bellgrove South landholdings. The Description of Developer's Land within Item 3 (page 3) includes "RTs 577722", which relates to Lot 2 DP 452196 and, therefore, the Additional Land. Figure 4L in **Attachment 4** is the "Land map" from the Agreement (Attachment B), which shows the Additional Land included as part of the entire Bellgrove development.

193 The situation faced by BRL reflects the timing of different planning processes underway in Greater Christchurch. The CRPS has not yet been revised to give full effect to the NPS-UD and I understand is currently subject to review with changes anticipated to be notified at the end of this year (noting that this was

previously intended to occur in 2022⁹⁸). To wait for the CRPS to address this mapping anomaly would be inefficient and seems contrary to the NPS-UD which directs and anticipates authorities to provide for urban development in a timely manner where it is appropriate.

- 194 The rezoning of the Additional Land alongside the remainder of the Bellgrove South Site and its inclusion within the SER DA and SER-ODP would address the mapping anomaly that, for the reasons outlined below, would not undermine the CRPS. From the planning background outlined above the District Plan Review is an appropriate RMA process to look at the cadastral boundary mapping at a finer grain and the overall merits of the development area boundary.

Statutory Planning Framework in relation to the Additional Land

- 195 As noted above the NPS-UD aims to remove barriers to the supply of land and infrastructure and make room for growth in a structured and integrated way.
- 196 The NPS-UD places emphasis on urban growth for Greater Christchurch (including within Waimakariri District) and the pWDP must be prepared in accordance with the NPS-UD. Greater Christchurch is the only Tier 1 urban environment in the South Island identified in the NPS-UD. Tier 1 areas being those subject to the most directive policies which have been targeted towards the largest and fastest growing urban centres, where the greatest benefits will be realised.
- 197 The NPS-UD represents the Government's latest thinking on how to encourage plan-enabled, well-functioning and liveable urban environments that meet the diverse needs of their communities. It is the key planning instrument specifically designed to manage urban growth in New Zealand's fastest growing urban areas, with Rangiora no exception.
- 198 Enabling MRZ on the Additional Land in accordance with the revised SER ODP would be generally in accordance with the NPS-UD because the Additional Land

⁹⁸ *Officers considered that the appropriate process to consider the merits of such a policy change is during the review of the Canterbury Regional Policy Statement scheduled for 2022⁹⁸. Our Space Hearings Panel Report, p. 113*

is a natural extension of the SER ODP, it is infrastructure-ready⁹⁹ and can be provided with appropriate roading connections.

199 The CRPS does not yet give effect to the responsiveness and out of sequence provisions of the NPS-UD 2020 (such as the criteria directed by clause 3.8(3)).

200 Specifically, Objective 6.6.1 (3) Recovery Framework' of the CRPS looks to ensure that development within Greater Christchurch *avoids urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS*. Objective 6.2.2 of the CRPS 'Urban form and settlement pattern' outlines a similar sentiment.

201 The intent behind Map A's inclusion relates to certainty and efficiency of infrastructure delivery for appropriately located greenfield residential development. This is further confirmed by the Hearings Panel Recommendations Report on Our Space which (p. 113) notes that:

*'Map A was inserted into the Canterbury Regional Policy Statement through the Land Use Recovery Plan, having previously been included in Plan Change 1 to the Canterbury Regional Policy Statement. They said that the projected infrastructure boundary gives infrastructure providers certainty around where growth will be focused, for forward planning and infrastructure planning purposes. Officers consider this remains an appropriate mechanism to ensure the strategic integration of infrastructure with urban activities and the attainment of the intensification and consolidation objectives of Chapter 6 in the Canterbury Regional Policy Statement.'*¹⁰⁰.

202 In this regard, I refer to Mr Trist's, Mr Collins and Mr Delagarza's evidence which confirms that that the Additional Land can be readily and logically developed in conjunction with the balance of Bellgrove South. It can be provided with roading connections and all services that are necessary to enable it to be developed, and has no geotechnical issues preventing it from development as part of the wider Bellgrove development.

⁹⁹ Infrastructure ready defined in Clause 3.4(3)(e) of the NPS-UD in relation to the medium term as meaning that the adequate infrastructure to support development infrastructure to support the development capacity is identified in a long-term plan. The Rangiora Eastern Link is identified within the WDC's Draft Long Term Plan 2024/2034 on which engagement closed April 15.

¹⁰⁰ <https://www.greaterchristchurch.org.nz/assets/Documents/greaterchristchurch/Our-Space-Hearings/Hearings-Panel-Recommendations-Report-FINAL-COLLATED-5-June-2019.pdf>, p. 113

- 203 Further the inclusion of the Additional Land will ensure the protection, maintenance and enhancement of the Cam/Ruataniwha River whilst enabling the river to form the natural boundary between rural and residential land use in South-East Rangiora. In addition, it will provide opportunities for ecological and amenity enhancement to be captured within the revised SER ODP, contributing to a well-functioning urban environment that would also meet the intent of the CRPS Recovery Framework Objective 6.2.1 (4) and (6) by protecting, maintaining and improving the natural surface waterbody.
- 204 Inclusion of the Additional Land is generally consistent with the outcomes anticipated by the CRPS objectives and policies within Chapter 6 and the only point of inconsistency appears to be in relation to Objective 6.6.1(3) which seeks to avoid urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS;. Given the relatively small size of the land, its location adjacent to land already within the SER ODP, and the provision already made for servicing this area through the IAF Agreement, I do not consider any material harm arises from the inclusion of the Additional Land. Further, inclusion of the Additional Land would appear to be consistent with the outcomes for urban development anticipated by the NSP-UD.
- 205 There are a number of other matters relevant to the consideration of the Additional Land that distinguish it from other land at the periphery of urban areas, and provide comfort that the inclusion of the Additional Land within the SER DA would not set a precedent for widespread changes to the FDA's that are inconsistent with Map A. These are outlined below:

Creation of a non-complying balance lot

- 206 The Additional Land is approximately 3.3ha. Subdivision and development of the SER DA as notified would leave a 3.3 ha balance block. Given the Additional Land shares some 103m of its northeast boundary with the Cam/Ruataniwha River, a minimum 20m wide esplanade reserve or strip would be required to be provided in accordance with SUB-S17 'Esplanade Reserves or Strips' (noting that the Cam/Ruataniwha River is a water body listed in Table SUB-2 for the purpose of conservation and natural hazard mitigation). This would result in a total esplanade provision of approximately 2,060m², reducing the area of the resultant rural allotment to approximately 3.1ha, further increasing the non-

compliance with the 4ha minimum lot size for subdivision in the RLZ (non-complying activity). This does not represent a good planning outcome or efficient use for this block, especially noting Mr Trist's evidence that the Additional Land can be readily developed to provide for a well-functioning urban environment in conjunction with the wider Bellgrove South.

- 207 The Kelley block to the north (Lot 1 DP 452196) is the only other block which could be similarly impacted by this provision. From my analysis approximately 5ha of this block is located outside the SER DA, i.e. similarly severed by the SER DA boundary. Despite being larger than 4 ha, its subdivision would also trigger the esplanade reserve requirement which, based on approximately 295m of the Cam / Ruataniwha River, equates to 9740m². It is therefore possible that subdivision of the Kelley block would retain a compliant balance lot in the RLZ. To this end, the Additional Land is the only land that will result in a non-complying lot having to be created in the RLZ on account of the severance caused by the SER DA as notified.

Additional Land would be land locked

- 208 The Additional Land would effectively be land locked, required to be accessed through an area of Medium Density Residential development. Whilst this may not have any practical issues, it is at the very least an unusual and unique situation with no direct access enabled from either Northbrook Road or Rangiora Woodend Road. I note that for 479 Rangiora Woodend Road (Lot 1 DP 452196) and 52 Northbrook Road (Lot 2 DP 306045), their balance land outside the SER DA would continue to have direct access from the existing road network (and not be required to navigate a newly established built-up urban environment). The notified SER-ODP even anticipates vehicle access for the remaining portion of 52 Northbrook Road by leaving a small access strip with no land use identified (Figure 4).

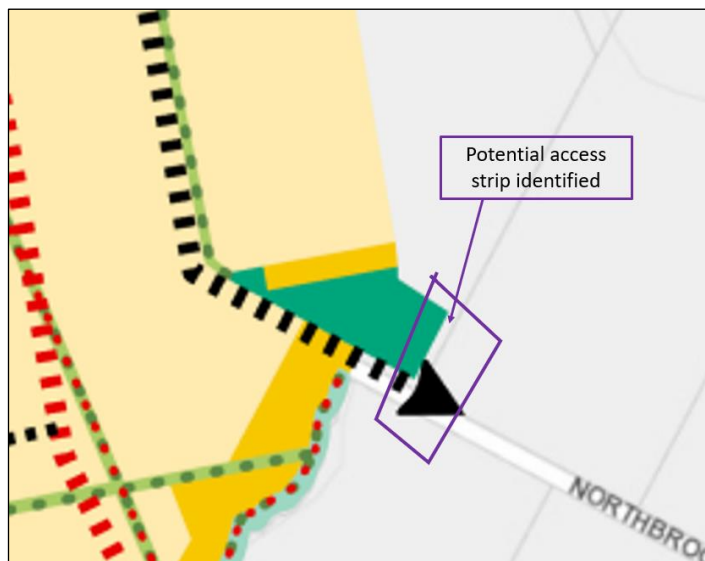


Figure 4. Notified SER ODP showing a strip of no land use activity indicating a potential access location for the remaining Rural Lifestyle zoned portion of 52 Northbrook Road (Lot 2 DP 306045)

Movement Patterns East Identified

209 The notified SER ODP indicates two road connections into the Additional Land from the balance of the Bellgrove land.

Additional Land Development Ready

210 The Additional Land is part of Bellgrove's wider substantial adjacent land holding with all master planning and development considerations for Bellgrove South accommodating its inclusion. It is on this basis that its inclusion can be well integrated and result in the establishment of a well-functioning urban environment.

No Further Submissions

211 There are no further submissions opposing BRL's request to include the Additional Land in the SER DA.

Aligned with Infrastructure Provision and integrated with Bellgrove South

212 Mr Trist's, Mr Delagarza and Mr Collins' evidence demonstrates that the Additional Land can be readily and logically developed in conjunction with the balance of Bellgrove South. It can be provided with roading connections and all services that are necessary to enable it to be developed, with no geotechnical issues preventing it from development as part of the wider Bellgrove development.

IAF Agreement

213 As mentioned above, the Additional Land is subject to the IAF Agreements that 1) commit WDC to the specified Enabling Infrastructure Projects that will accelerate 1,300 new dwellings in the Bellgrove development, and 2) commit Bellgrove to the delivery of those 1,300 dwellings. I consider the IAF Agreements set the Additional Land apart from other Records of Title that may straddle the boundary of an ODP in the PWDP and the boundary of an FDA on Map A of the CRPS.

Agricultural Productivity of the Land

214 The Additional Land is not viable for continued long term use as productive land with Mr Dunham concluding that no options are available to generate sufficient income to cover direct expenses, interest & principle¹⁰¹.

Summary of distinguishing matters

215 In summary to this point, the NPS-UD directs WDC to provide for more housing in places close to jobs, community services, public transport and to respond to market demand. Assessing the CRPS in isolation of this higher-order document would not present an appropriately balanced or considered view of the environment or context of the Additional Land. For the foregoing reasons, I consider the rezoning to MRZ and inclusion of the Additional Land within the SER DA and SER ODP would meet the intent behind the inclusion of Map A in the CRPS, and that it is appropriate that a finer grain cadastral boundary analysis be taken to determine the practical, logical and efficient delineation of the SER DA in the PWDP as it concerns BRL's land.

216 In the alternative, should the Panel not be attracted to the approach outlined above, I note that there is scope to do so through the concept of responsive planning provided by Policy 8 of the NPS-UD.

217 Policy 8 is supported by implementation clause 3.8 of the NPS-UD which provides for a plan change which provides significant development capacity that is not otherwise enabled in a plan or is not in sequence with planned land release.:

¹⁰¹ Land Productivity Evidence of Mr Dunham, paras 33 and 107-108.

218 Inclusion of the Additional Land within the SER DA and as part of a rezoned MRZ Site would provide an additional development capacity of approximately 28 households. I note that this is a reduction from the 57 households indicated in my Hearing Stream 10A evidence and reflects:

- (a) the corrected area of the Additional Land (3.3ha as opposed to 4.01ha as previously stated, reducing the land available for housing by approximately 7,000m²),
- (b) additional work undertaken to draft up a concept lot layout excluding the Additional Land (rather than base this on a more simplistic yield calculation), and
- (c) the extent of green space established within the Additional Land to provide an appropriate eastern boundary interface (including esplanade reserve adjacent to the Cam / Ruataniwha River, open space and green link provision along the eastern boundary) and the required space for stormwater management for the wider Site.

Whilst 28 households / residential lots may not at face value appear 'significant' in the context of the housing requirements for Greater Christchurch, or possibly even in the context of the Waimakariri District, I do consider it to be significant in the context of Bellgrove South and the SER DA. Further, Mr Colegrave notes in his economic evidence that he considers an additional 28 lots to be *a meaningful, and significant, contribution to housing supply*¹⁰² and refers to the Greater Christchurch Housing Development Capacity Assessment (March 2023) which describes landowners developing 20 or more dwellings as being significant¹⁰³.

219 As such (and particularly given the shortfalls for residential housing in the District outlined in the economic evidence of Mr Colegrave) I consider that the Additional Land would enable 'significant development capacity' increase.

220 Further, its inclusion within an area which is infrastructure-ready with good transportation connections is consistent with the NPS-UD objectives of achieving a well-functioning urban environment and consolidated urban form

¹⁰² Economic Evidence of Mr Colegrave, para 109

¹⁰³ Economic Evidence of Mr Colegrave, para 110

and ensuring that housing is provided for in an efficient manner for housing affordability.

MATTERS RAISED BY SUBMITTERS

- 221 The only submission received related to the rezoning request by BRL is that by Richard and Geoff Spark (Further Submission 37). The Spark submission supports the relief generally sought by BRL (including the rezoning request) but sought that any changes made to the SER-ODP and SER-DA provisions be to their satisfaction.
- 222 The revised SER-ODP has been reviewed by both the Council Reporting Officer Mr Wilson and Mr Thomson for Richard and Geoff Spark on 12 April 2024 with no objections made to the revisions shown. Following this, a combined plan is being prepared incorporating the changes sought by both BRL and the Sparks on the overall SER-ODP. This will be provided as part of supplementary evidence.
- 223 Whilst Submission 391 by Gregory Kelley did not specifically reference Bellgrove South I note that it did raise concern regarding future urban development within the SER-DA. In particular, it outlined concerns regarding the effects of development on the ecological values and the hydrology of the Cam/Ruataniwha River.
- 224 Mr Trist's infrastructure evidence touches on this noting that dewatering will be required for the construction of the new wastewater pump station and stormwater infrastructure within the Site, similar to that already undertaken to support the development of Bellgrove North¹⁰⁴. In this regard, he notes that impacts on groundwater from the development of the Site can be appropriately managed through a resource consent process with ECan prior to subdivision and that as with Stage 1 of Bellgrove North this is likely to include a combination of appropriate technical groundwater expertise and assessment, resource consent conditions and monitoring.
- 225 There were no other matters raised by submitters in relation to the rezoning request made by BRL.

¹⁰⁴ Infrastructure Evidence of Mr Trist, para 59-63

CONCLUSION

226 Overall, I consider that rezoning of the Site in Bellgrove South to MRZ, with the corresponding changes made to the SER ODP (including the inclusion and incorporation of the Additional Land), will more efficiently and effectively deliver the outcomes sought by the higher order planning framework than the notified RLZ.

227 Thank you for the opportunity to present my evidence.

Michelle Ruske-Anderson
30 April 2024

ATTACHMENT 1: BELLGROVE RANGIORA LIMITED PROPERTY LOCATION PLAN

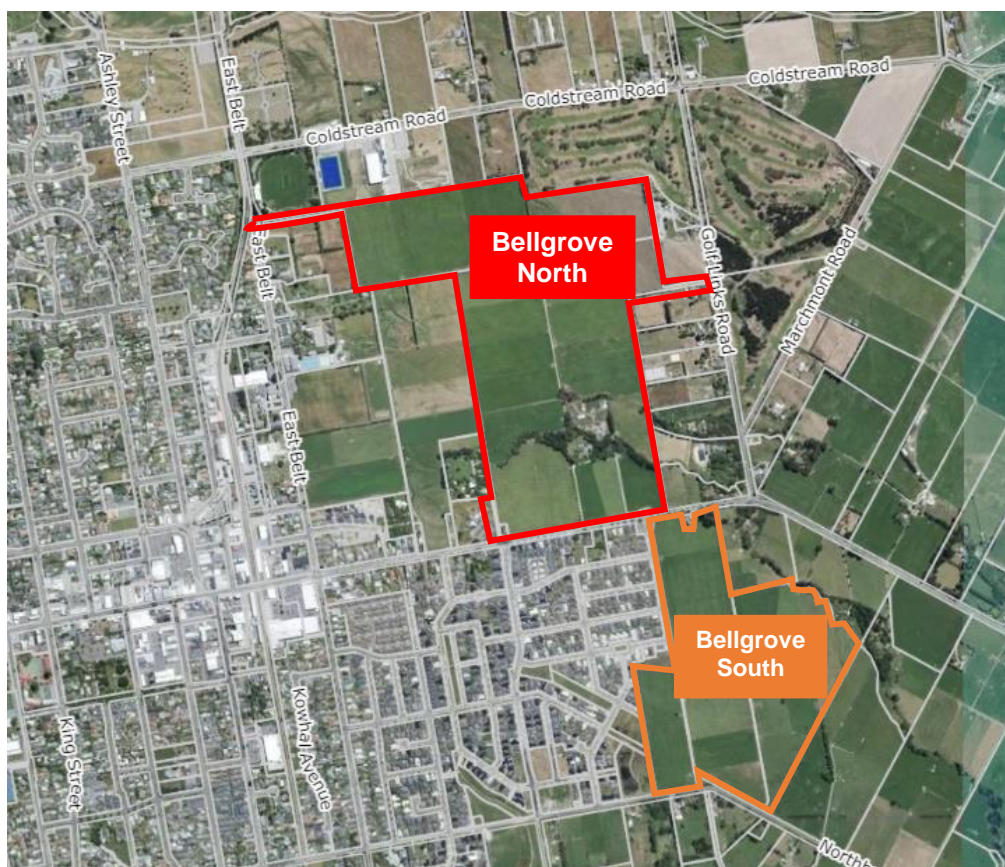


Figure 1A. BRL Landholding Location Plan

Address	Legal Description	Record of Title	Owner	Area (ha)
Bellgrove North				
Bellgrove Stage 1	Lot 5000 DP 598100	1159844	BRL	5.64
	<i>Recently created residential allotments (Stage 1A, 1B and 1C of Subdivision Consent RC125579).</i>			
174 East Belt	Lot 2 DP 583905	1096755	BRL	42.01
78 Kippenberger Avenue	Lot 1 DP 79128	CB45B/1204	Mark Darryn Hawker, Neil Ivan Hawker, Patricia Mary Hawker	0.0789*
73-77 Golf Links Road	Lot 1 DP 24808	CB8B/1426	Rangiora Golf Club Incorporated	0.1764**
<i>Total Bellgrove North Area</i>				63.27

Bellgrove South				
15 Kippenberger Avenue	Lot 2 DP 394668	577722	BRL	8.79
74 Northbrook Road	Lot 2 DP 452196		BRL	14.21
N/A	Lot 2 DP 12090	CB474/29	BRL	8.20
100 Northbrook Road ***	Lot 4 DP 25508	CB7A/1261	BRL	4.59
<i>Total Bellgrove South Area</i>				35.79
Total BRL Landholding				99.06

*BRL have purchased approximately 789 m² of Lot 1 DP 79128 (total site area of 2.53 ha) being the accessway for the lot which facilitates the construction of the Road 1 / Kippenberger Avenue / MacPhail Avenue Roundabout. A Caveat by BRL (Ref 12342731.1) is listed on the Record of Title (CB45B/1204) giving effect to this.

**BRL will enter an agreement with the Rangiora Golf Club to acquire a 12m-wide strip of land (approximately 0.1764 ha of the Club's 3.26 ha site) to enable the establishment of a 22m-wide East – West Collector Road in accordance with the NER ODP. This will require a realignment and alteration to the existing Golf Course boundary, the exact area of which is to be determined.

*** Lot 4 DP 25508 (100 Northbrook Road) is already proposed to be zoned MRZ as part of Variation 1.

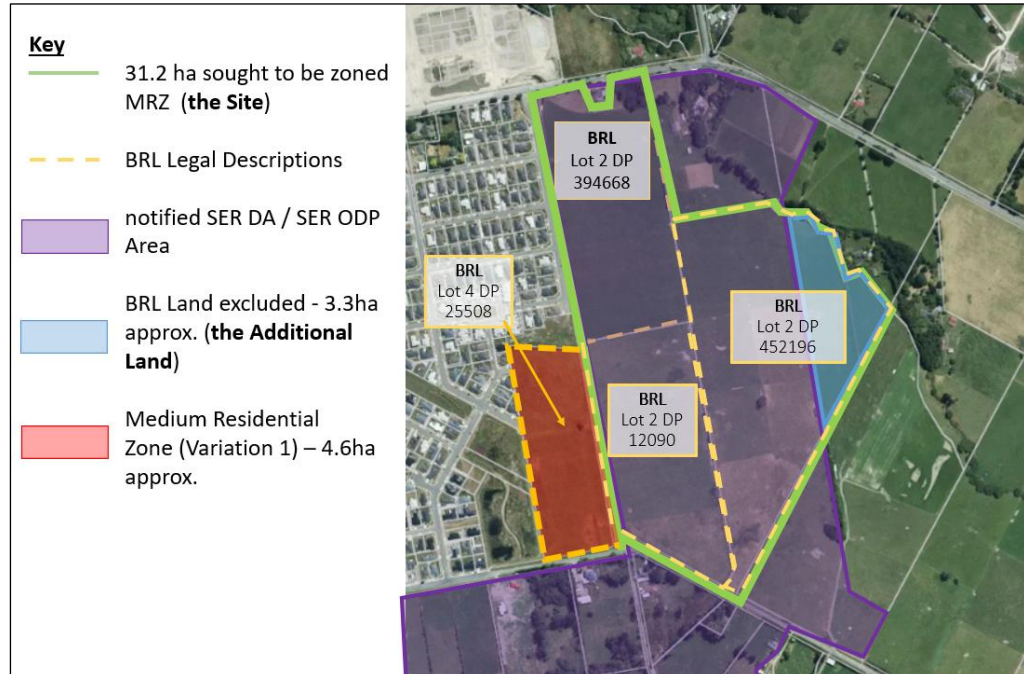


Figure 1B. Additional Land (blue) excluded from the SER DA and SER ODP in the PWDP

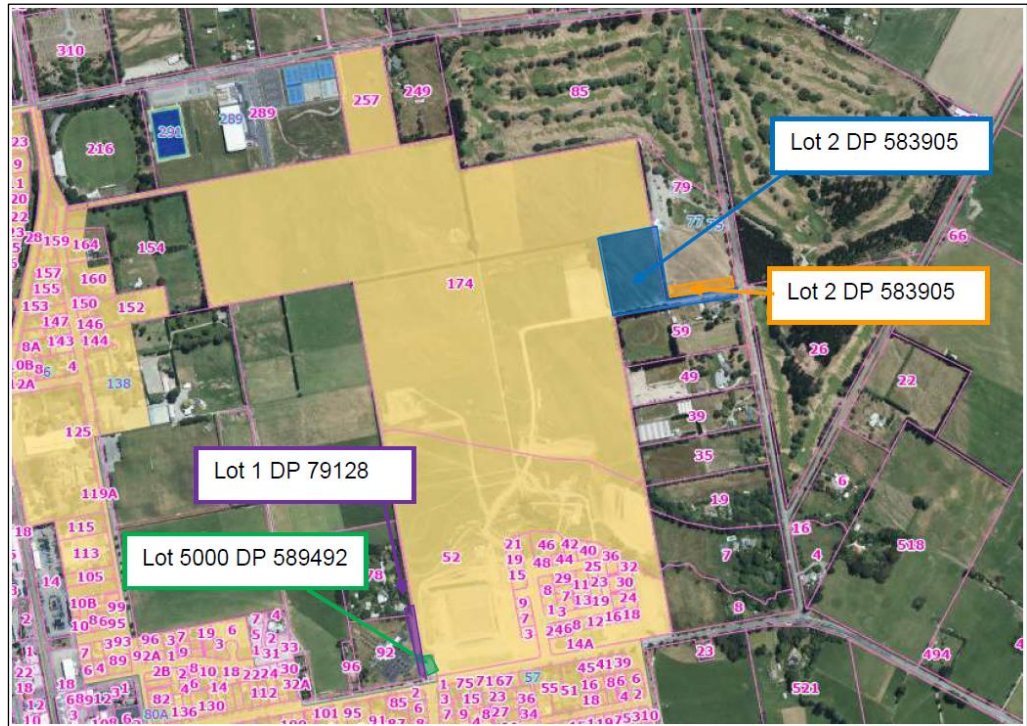


Figure 1C. Area of Land Omitted from the proposed Medium Density Residential Zone in the NER-DA.

ATTACHMENT 2: REVISED AMENDMENTS SOUGHT BY BRL TO THE SER ODP

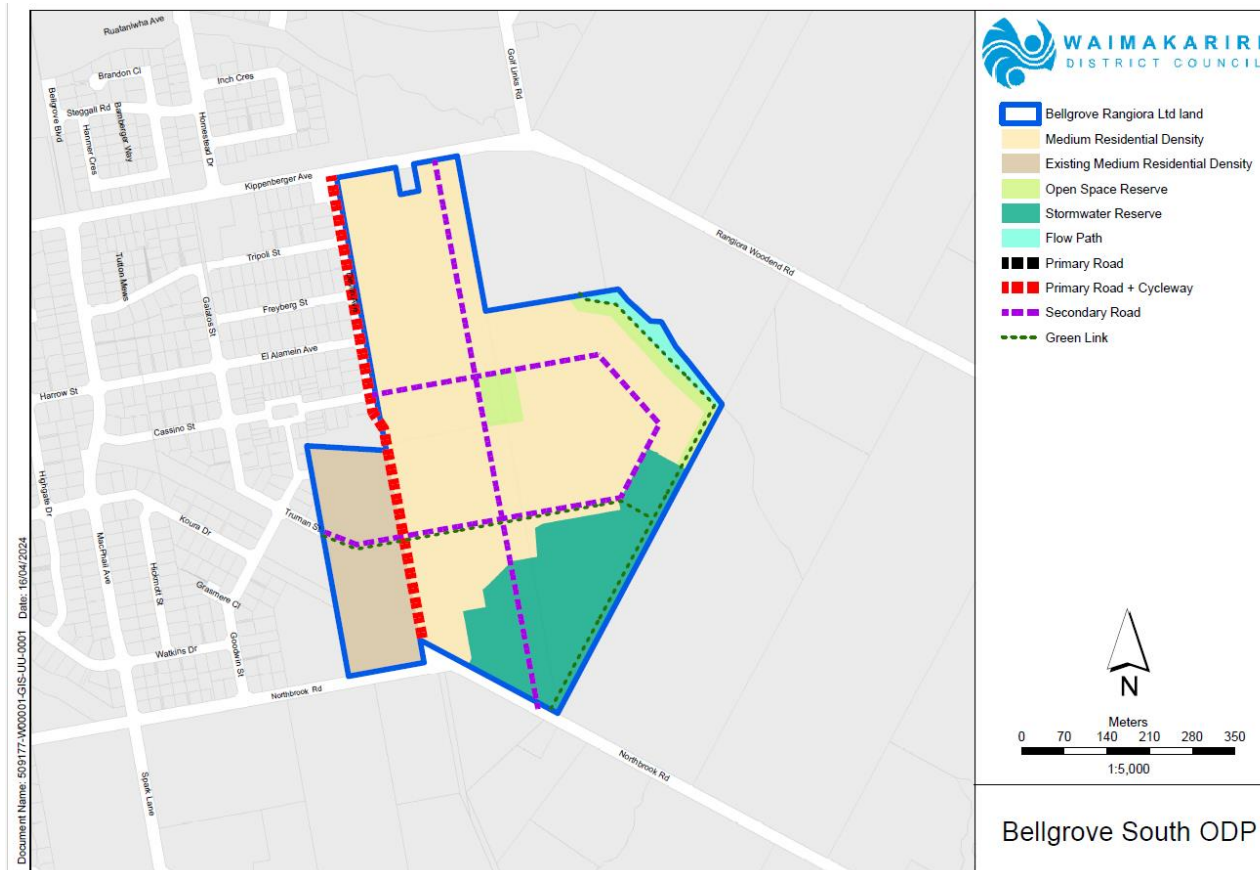


Figure 2A-1. Bellgrove South ODP – 16 April 2024 DWG Reference 509177-W00001-GIS-UU-0001

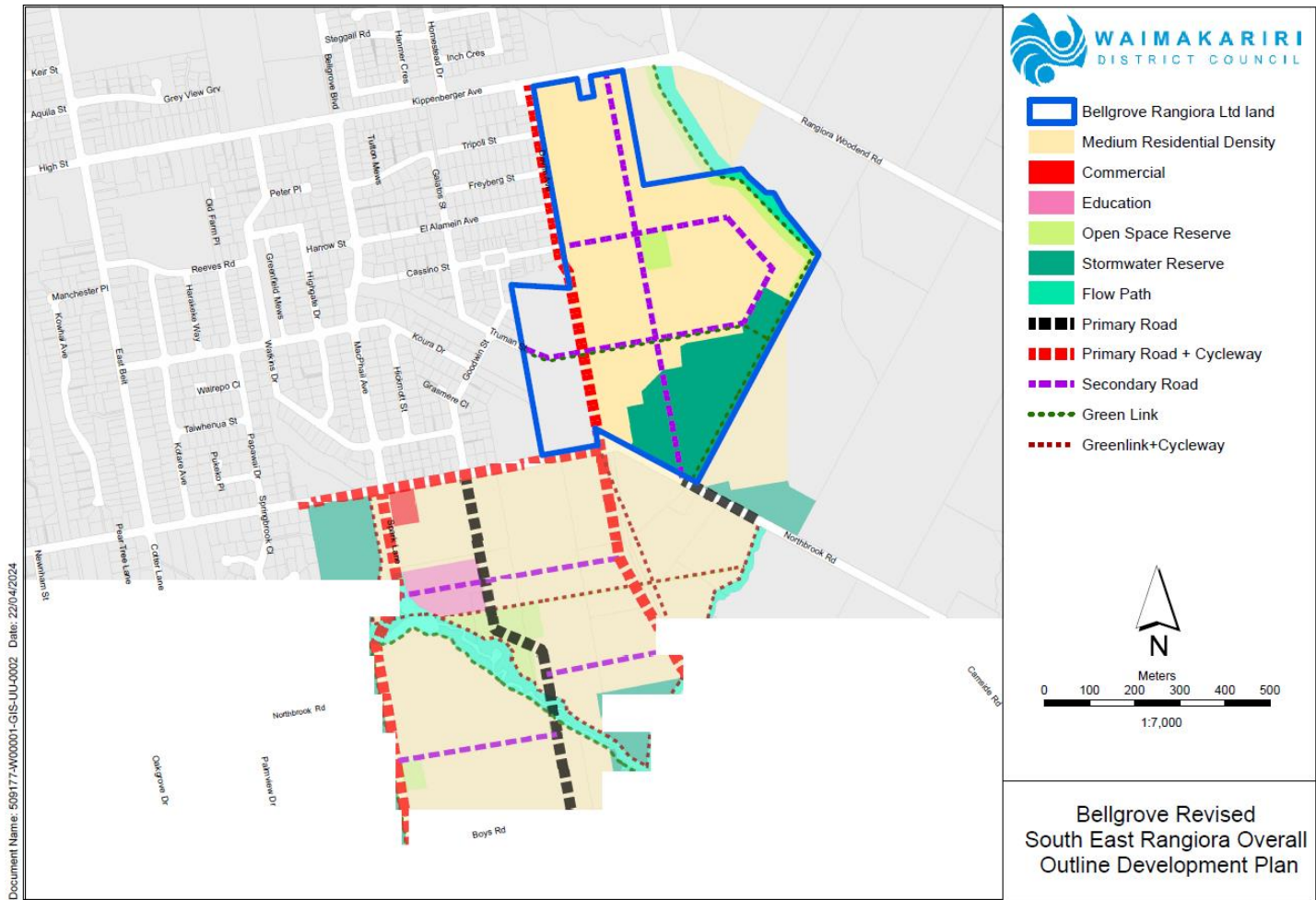


Figure 2B-1. Revised SER-ODP – 22 April 2024 DWG Reference: 509177-W00001-GIS-UU-0004



Figure 2B-2. Revised Water and Wastewater SER-ODP

Table 2C. Evolution of Changes sought by BRL to the SER-ODP

ODP Element	Notified SER-ODP	BRL Submission Changes	Revised SER-ODP
Geographic Extent			
Additional Land	Additional Land Excluded		Includes Additional Land
Land Use Plan			
Land Use	General Residential Density within the Site		Medium Residential Density
Movement Network			
Western North/South Road (Devlin Avenue Extension)	Primary Road plus cycleway	Primary Road Removed	Primary Road plus cycleway
Eastern North/South Road	Primary Road	Primary road plus Cycleway but moved further West	Secondary Road and moved further West
Secondary East / West Roads	Extension of Gelatos St / Truam St and Extension of Cassino St	Extends proposed roads into the Additional land area	Extends proposed roads into the Additional land area plus include a north / south connection between
Open Space and Stormwater Reserves			
Stormwater Reserve	None identified	Area identified within south-eastern corner of Bellgrove South	Larger extent identified
North South Green Link	Located along Devlin Avenue (+ extension) between Kippenberger Ave and Northbrook Rd		Removal of Devlin Ave green link New north-south green link alongside the western boundary of the Cam / Ruataniwha River and following the 'Bellgrove South' eastern boundary

East West Green Link	Located above Galatos St extension and the open space reserve	Removal of the east west green link.	Located adjacent (on the southern side) of the Galatos St extension and connecting through to the stormwater reserve
Open Space Reserve	Located at the intersection of eastern north/south road and the Galatos St secondary road extension	Removal of the southern portion (reduction in size)	Removal of the southern portion (reduction in size) and relocation of reserve further north
Flow Path	Not located within Bellgrove South	Extend the flow path shown through 521 Rangiora Woodend Road extending along the eastern boundary of the Additional Land	
<i>Water and Wastewater Network</i>			
Pumpstation	Located east of the Site within Lot 2 DP 306045 at 52 Northbrook Rd.	Pumpstation moved west to within Bellgrove South	
Sewer Main	Along Devlin Ave extension		
Water Line	Following proposed roading movement network		

ATTACHMENT 3: PWDP NOTIFIED SOUTH EAST RANGIORA AND NORTH EAST RANGIORA OUTLINE DEVELOPMENT PLAN

3A: PWDP NOTIFIED SOUTH-EAST RANGIORA OUTLINE DEVELOPMENT PLAN

Key features of the notified SER ODP as they relate to Bellgrove South can be summarised as

- (a) enabling general residential density;
- (b) key movement features being:
 - i. two north/south primary roads located between Kippenberger Avenue and Northbrook Road (one an extension of the existing Devlin Avenue and a second new more centrally located road);
 - ii. two secondary east/west link roads (one an extension of the existing Gelatos Street / Truam Street and the other an effective extension of Cassino Street);
 - iii. the Devlin Avenue extension would comprise a green link incorporating a cycling path adjoining the length of it; and
 - iv. extending the existing Northbrook Road at the south of the existing developed and zoned land and intersecting it through the Devlin Avenue extension to meet the new north/south connection. This would include closing a small section of Northbrook Road to allow the new road alignment.
- (c) an open space and stormwater reserve network comprising:
 - v. an open space reserve relatively central within the Site at the intersection of the new north/south primary road, and the secondary road extension, connected by green links;
 - vi. three green links (one alongside the Devlin Road extension, one running east/west above the Galatos Street secondary road extension; and one to the immediate east of the southern portion of the new secondary road);
 - vii. the Cam / Ruataniwha River is identified as a flow path and waterway to be protected and with adjacent stormwater reserve and waterway setbacks applying; and
 - viii. no stormwater reserves are identified or anticipated with the nearest shown located to the south-east on 52 Northbrook Road (Lot 2 DP 306045).
- (d) A water and waste-water network comprising a new sewer main along the Devlin Avenue extension and new water mains largely following the proposed primary and secondary roading network. In addition, a pump station is shown to the south-east on 52 Northbrook Road (Lot 2 DP 306045).

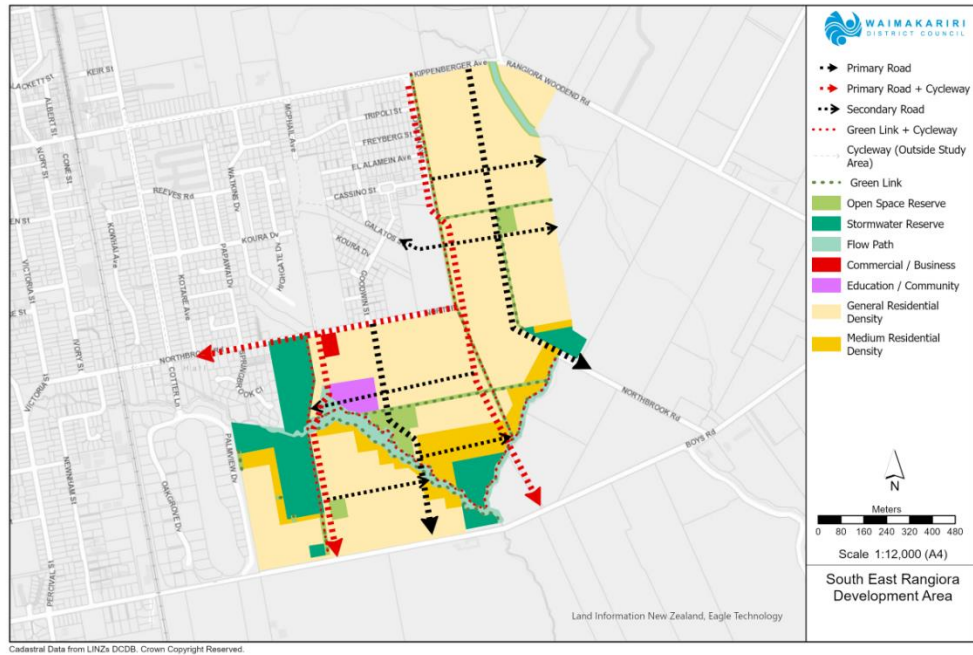


Figure 3A-1. South East Rangiora Overall Outline Development Plan (as notified in the pWDP 18 September 2021)

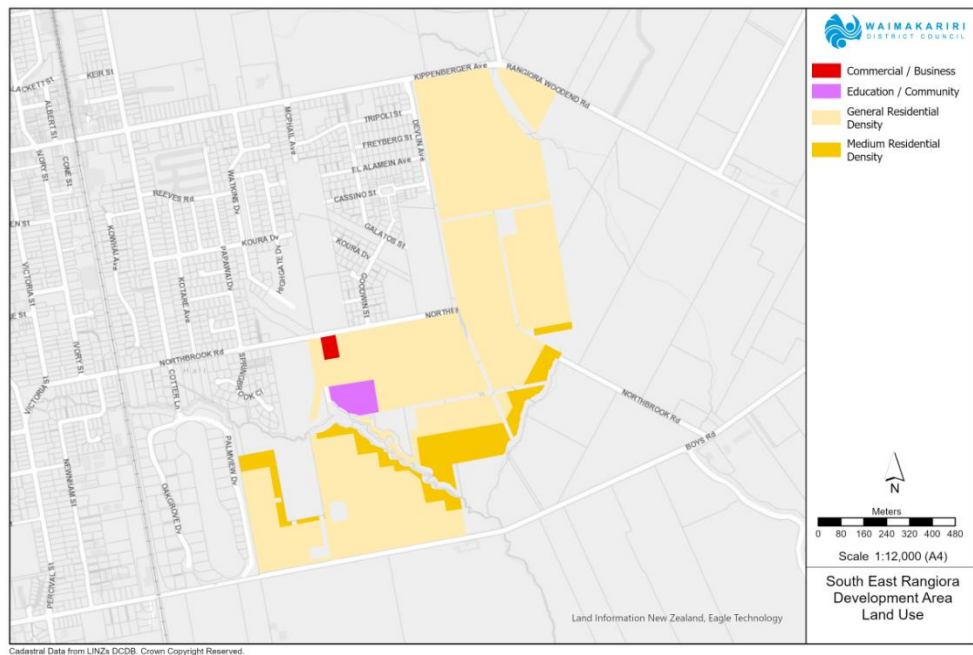


Figure 3A-2. South East Rangiora Land Use Outline Development Plan (as notified in the PWDP 18 September 2021)

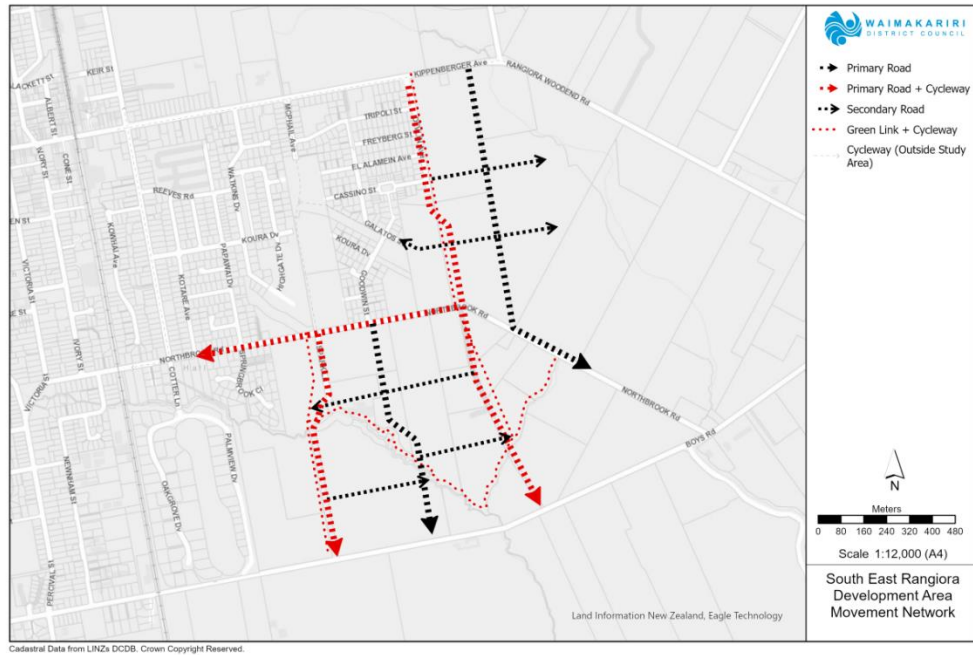


Figure 3A-3. South East Rangiora Movement Network Outline Development Plan (as notified in the PWDP 18 September 2021)



Figure 3A-4. South East Rangiora Open Space and Stormwater Reserves Outline Development Plan (as notified in the PWDP 18 September 2021)



Figure 3A-5. South East Rangiora Water and Wastewater Outline Development Plan (as notified in the PWDP 18 September 2021)

3B: CHANGES SOUGHT BY BELLGROVE TO THE PWDP NOTIFIED SOUTH-EAST RANGIORA OUTLINE DEVELOPMENT PLAN (AS PER VARIATION 1 SUBMISSION DATED 9 SEPTEMBER 2022)

The amendments sought by BRL to the SER ODP in their submissions on the pWDP and Variation 1, with the key changes sought described as:

- a) Inclusion of the Additional Land;
- b) Enabling medium density residential density (as opposed to general);
- c) Replacing the two primary north / south primary roads with a single main north/south primary road centrally located through the BRL landholding, slightly west of the proposed primary road shown on the notified SER ODP.
- d) Changes to the open space network:
 - i. Inclusion of a stormwater facility within the south eastern corner of the Site;
 - ii. Removal of the three green links and the inclusion of a new north-south green link adjacent to the Cam / Ruataniwha River and eastern boundary extending south to Northbrook Road; and
 - iii. Removal of the southern portion of the Recreation Reserve shown centrally on the ODP; and
- e) Amendments to the water and wastewater network to generally follow the revised roading network sought and the relocation of the pump station west so that it is within the BRL landholding.

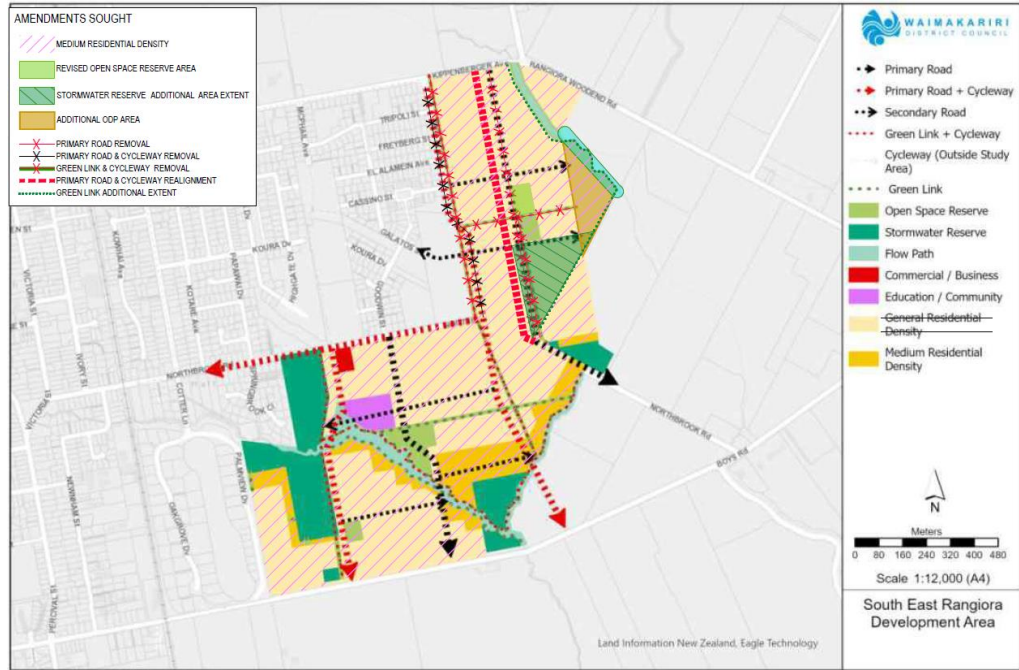


Figure 3B-1. Bellgrove Changes Sought to the South East Rangiora Overall Outline Development Plan

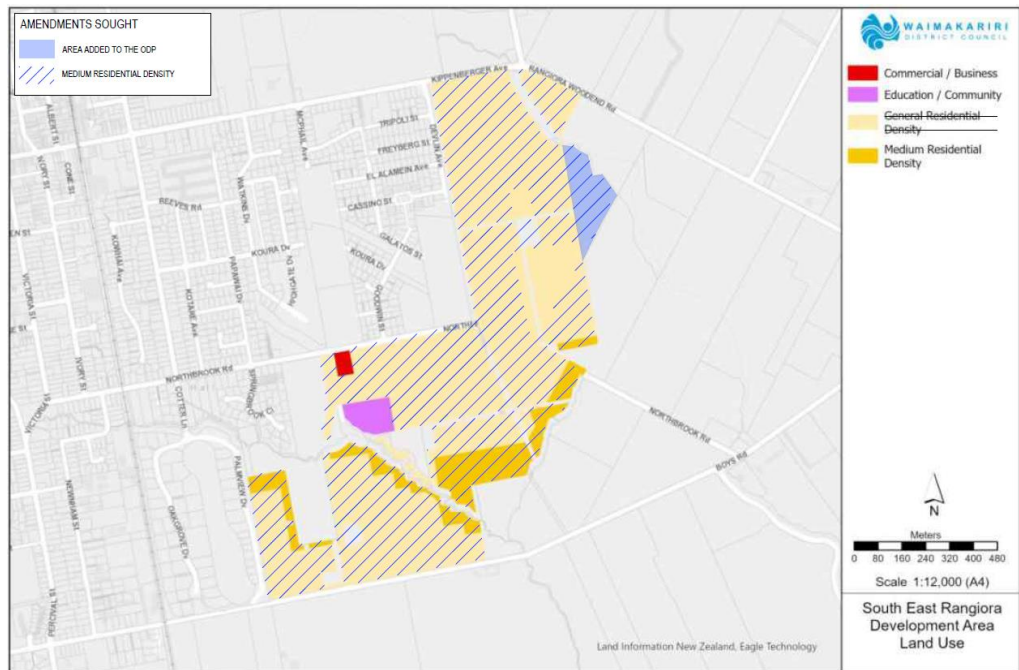


Figure 3B-2. Bellgrove Changes Sought to the South East Rangiora Land Use Outline Development Plan

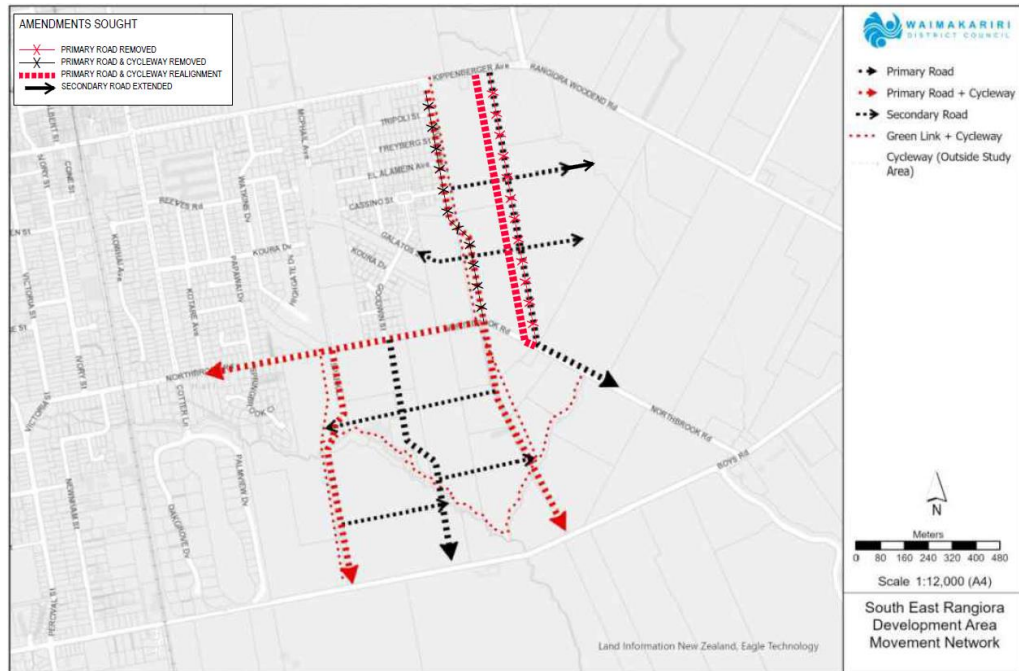


Figure 3B-3. Bellgrove Changes Sought to the South East Rangiora Movement Network Outline Development Plan



Figure 3B-4. Bellgrove Changes Sought to the South East Rangiora Open Space and Stormwater Reserves Outline Development Plan

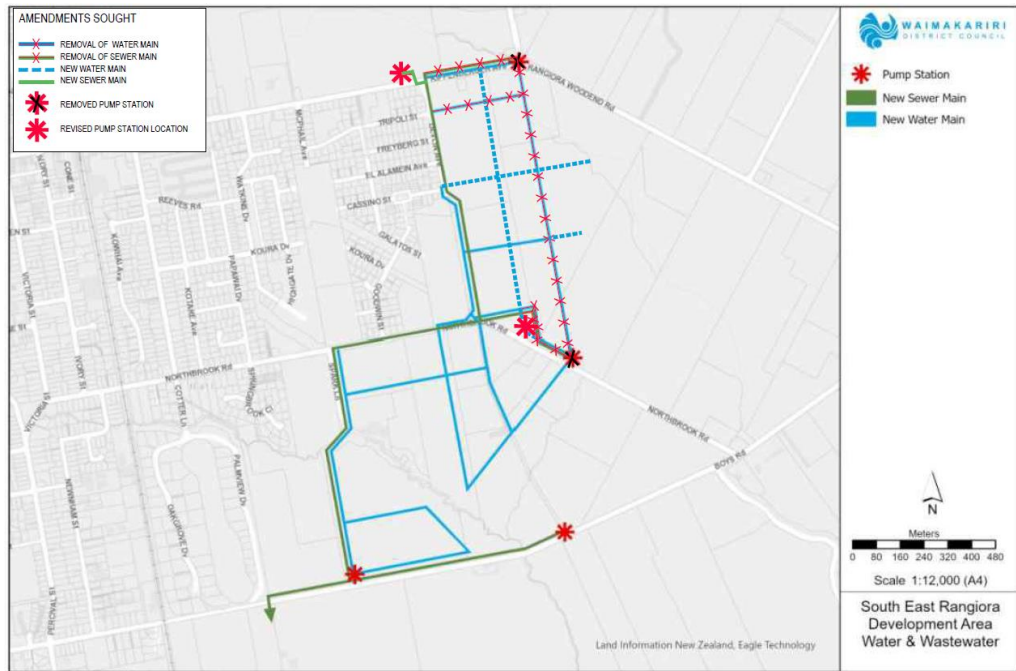


Figure 3B-5. Bellgrove Changes Sought to the South East Rangiora Water and Wastewater Outline Development Plan

3C: CHANGES SOUGHT BY BELLGROVE TO THE PWDP NOTIFIED NORTH-EAST RANGIORA OUTLINE DEVELOPMENT PLAN (AS PER VARIATION 1 SUBMISSION DATED 9 SEPTEMBER 2022)



Figure 3C-1. Bellgrove Changes Sought to the North East Rangiora Overall Outline Development Plan Option B

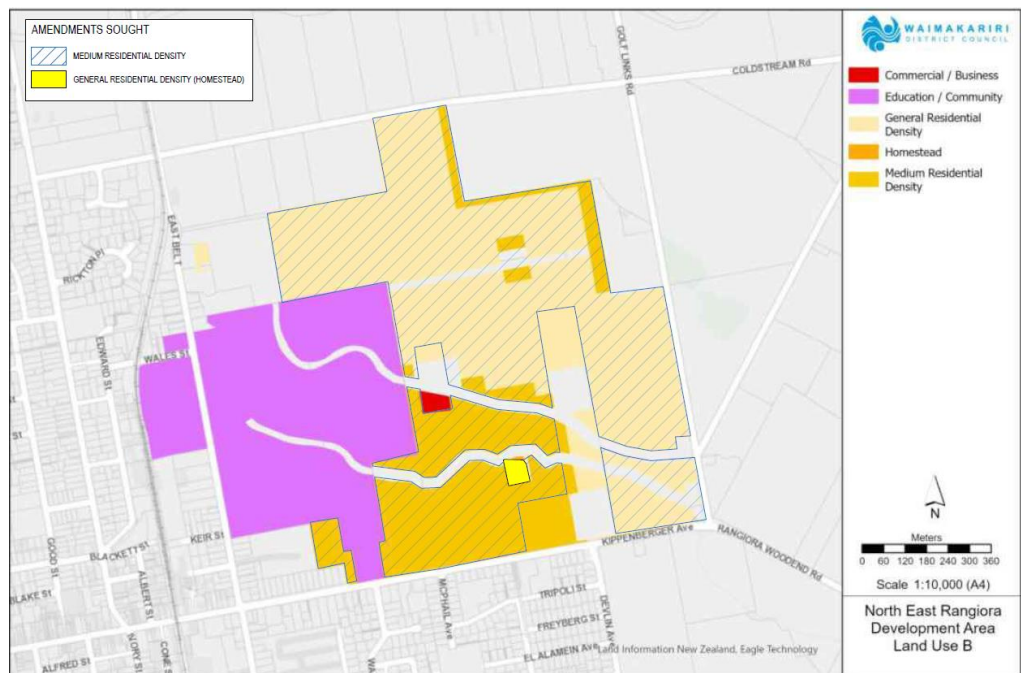


Figure 3C-2. Bellgrove Changes Sought to the North East Rangiora Land Use Outline Development Plan Option B

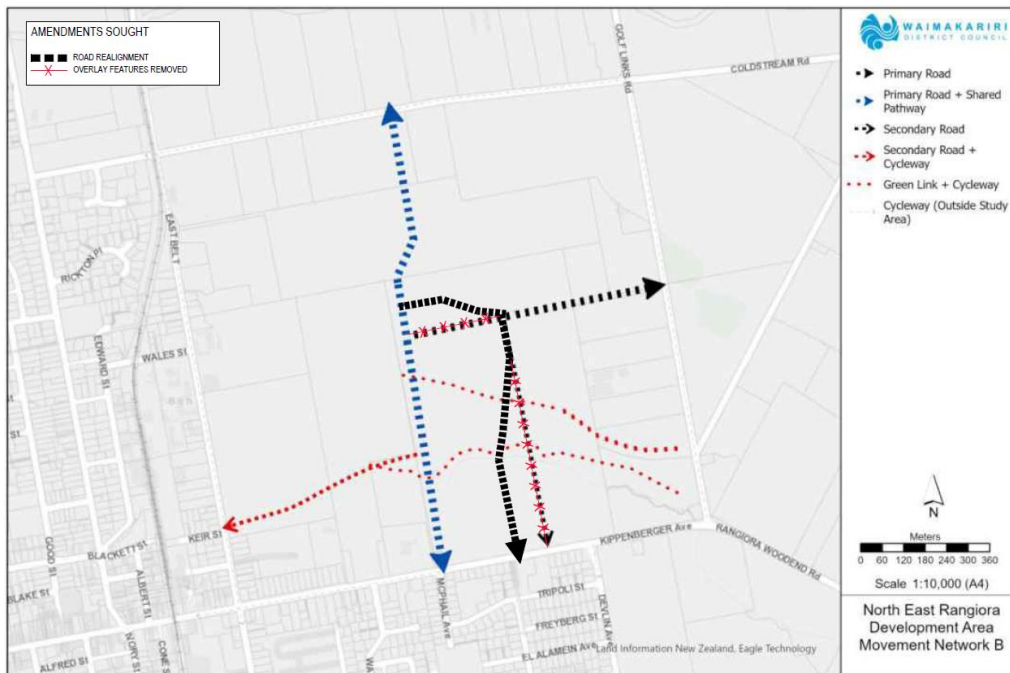


Figure 3C-3. Bellgrove Changes Sought to the North East Rangiora Movement Network Outline Development Plan Option B

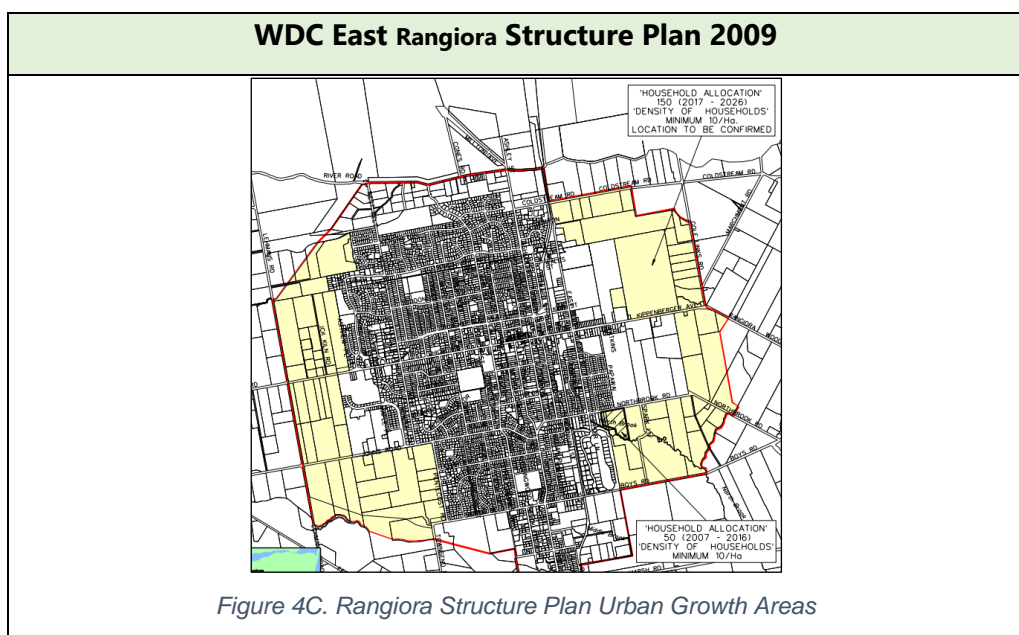
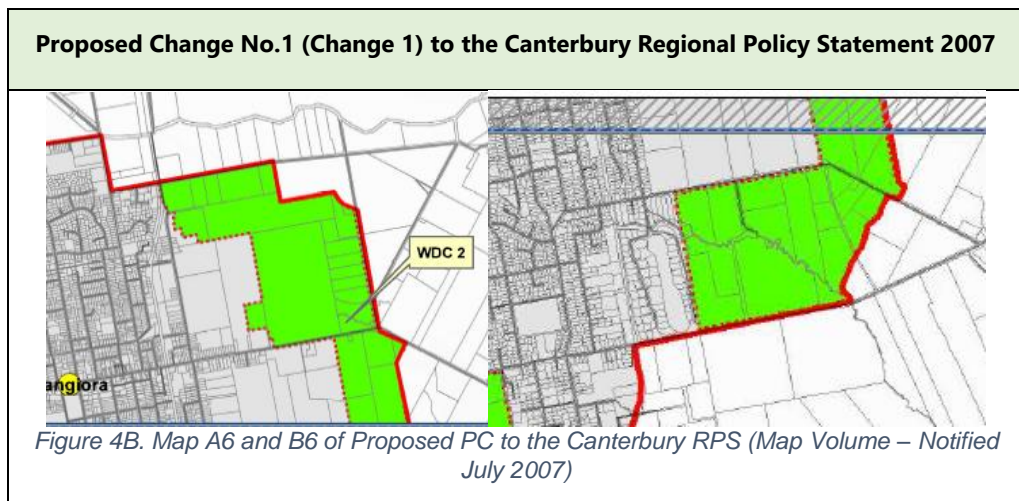
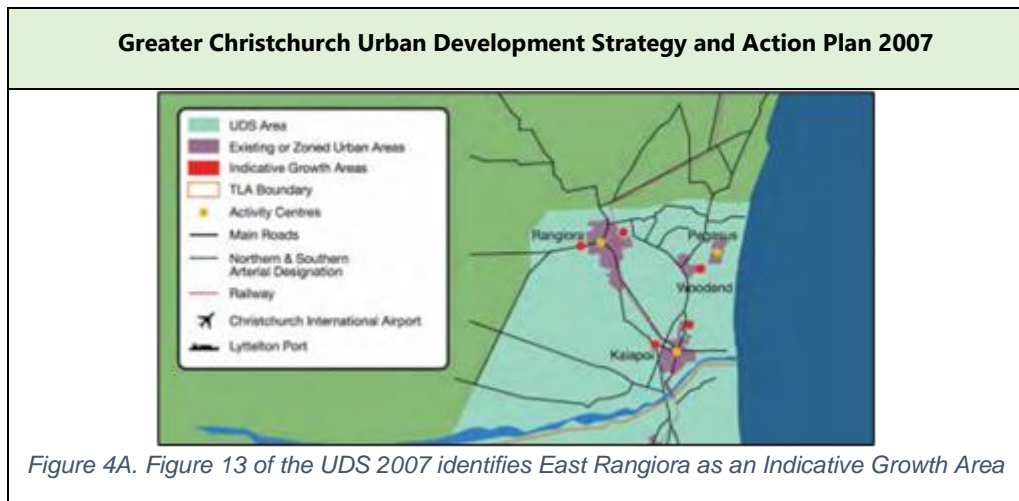


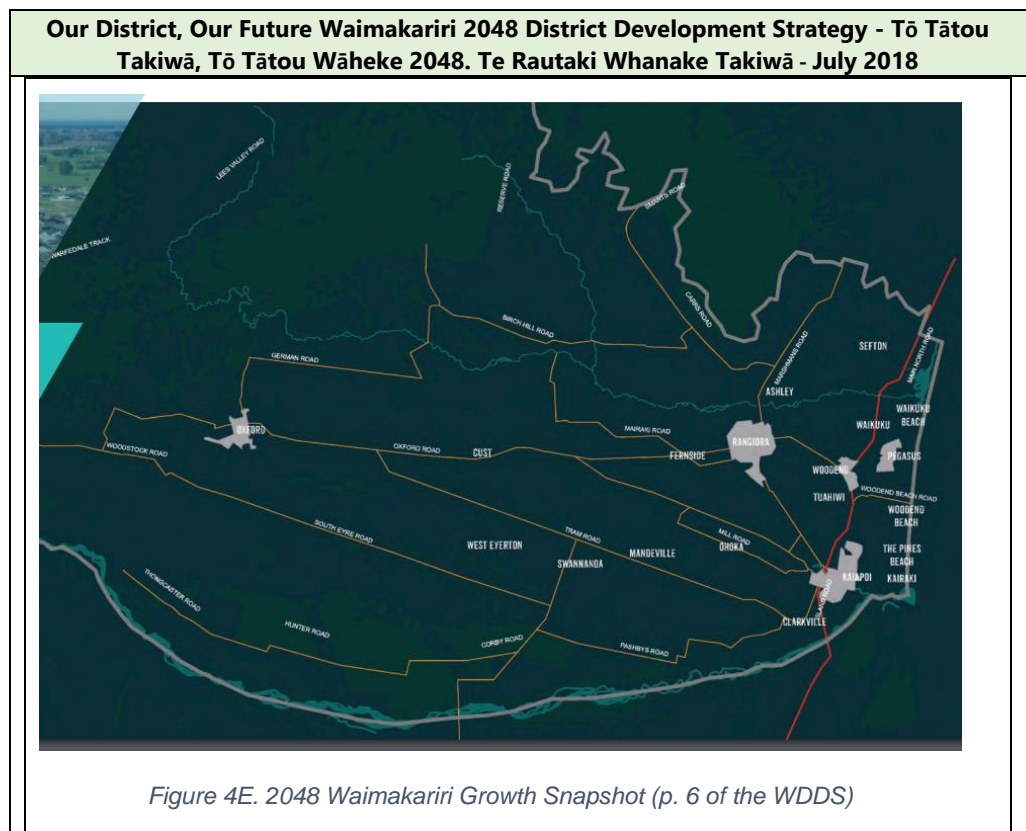
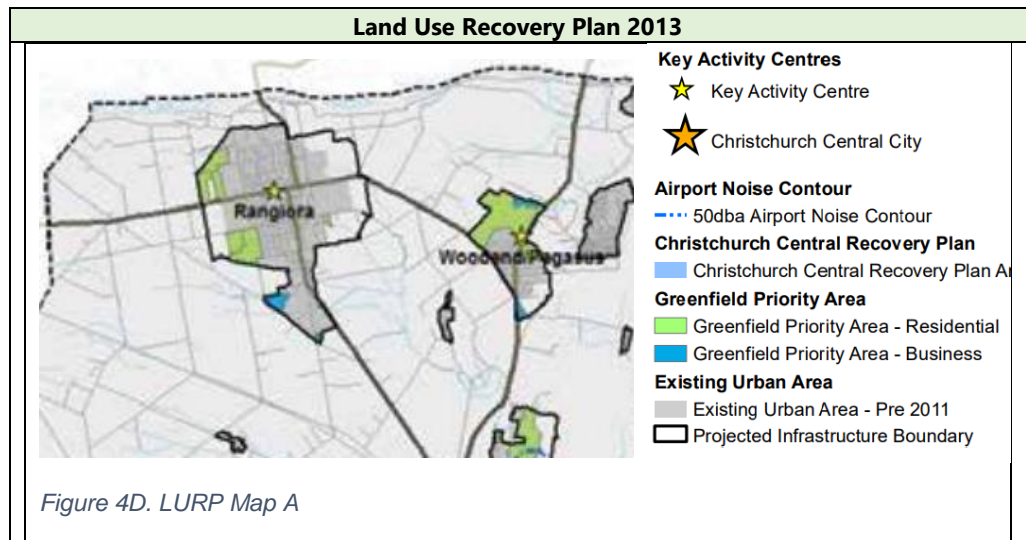
Figure 3C-4. Bellgrove Changes Sought to the North East Rangiora Open Space and Stormwater Reserves Outline Development Plan Option B



Figure 3C-5. Bellgrove Changes Sought to the North East Rangiora Water and Wastewater Outline Development Plan Option B

ATTACHMENT 4 RELEVANT PLANNING HISTORY FIGURES AND MAPS





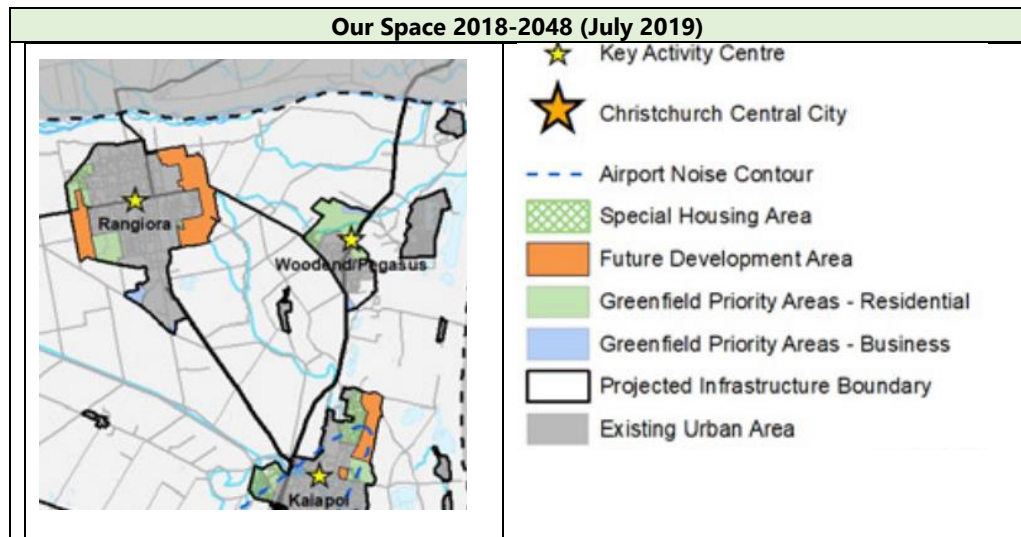


Figure 4F. Our Space Proposed Future Development Areas

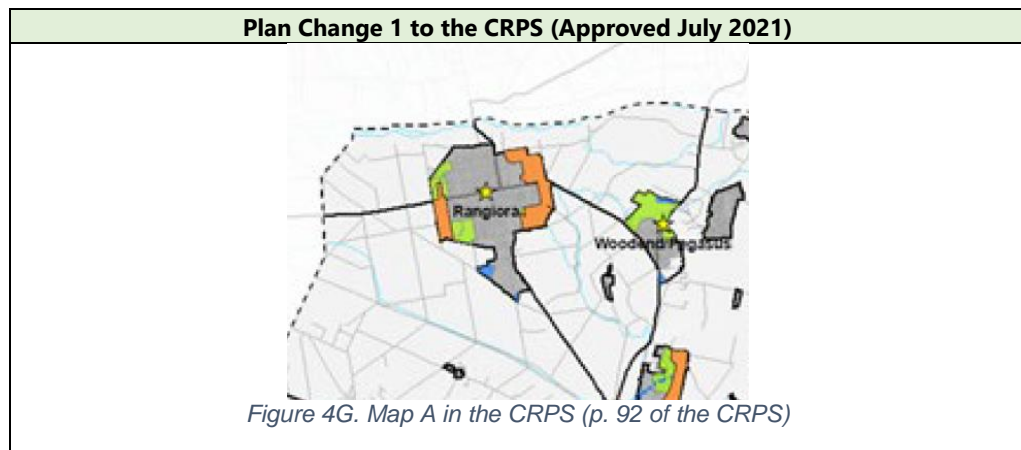


Figure 4G. Map A in the CRPS (p. 92 of the CRPS)

pWDP Notification including the NER and SER ODP's (notified September 2021)



Figure 4H. NER ODP (Option B) included in the pWDP (September 2021)

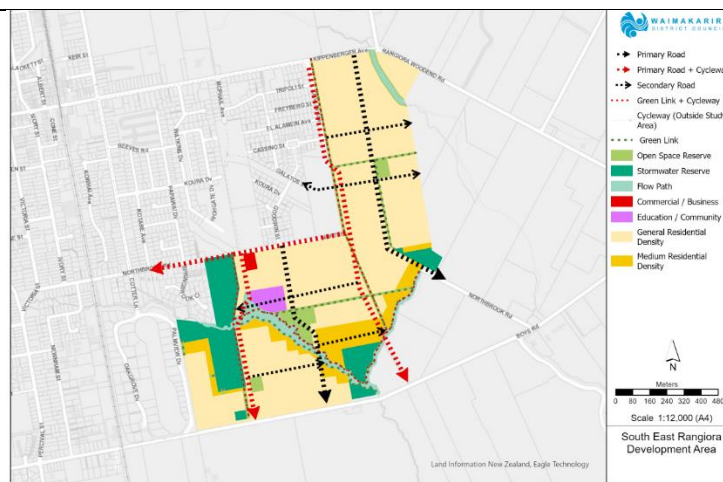
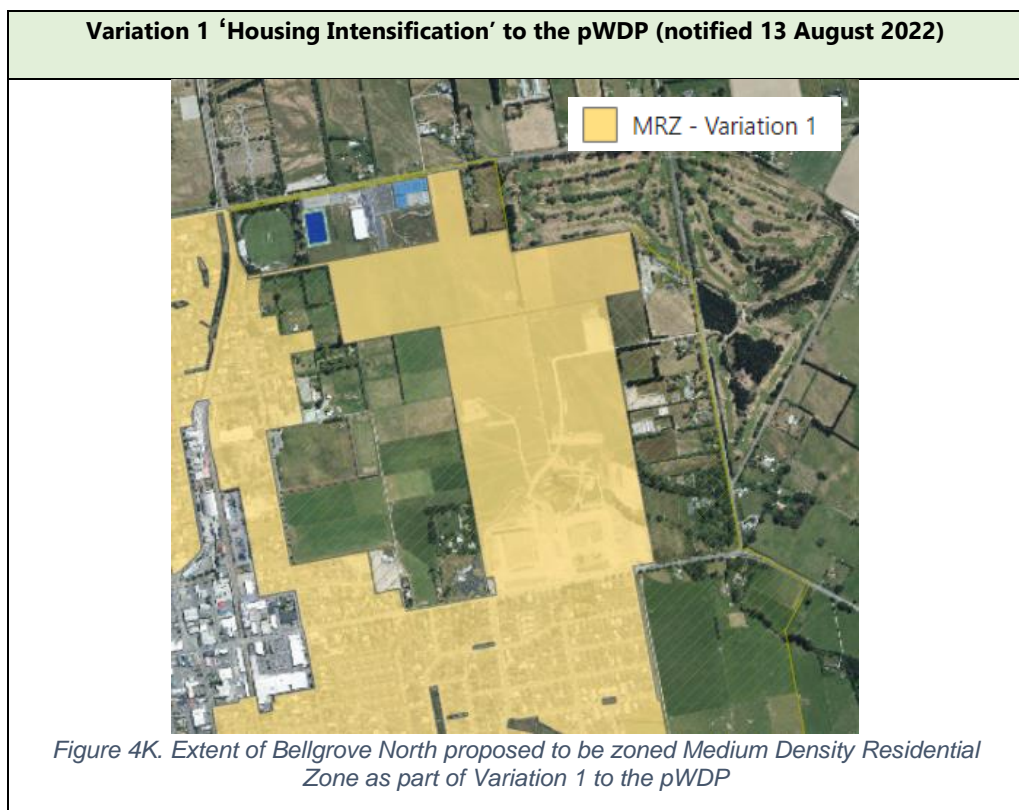
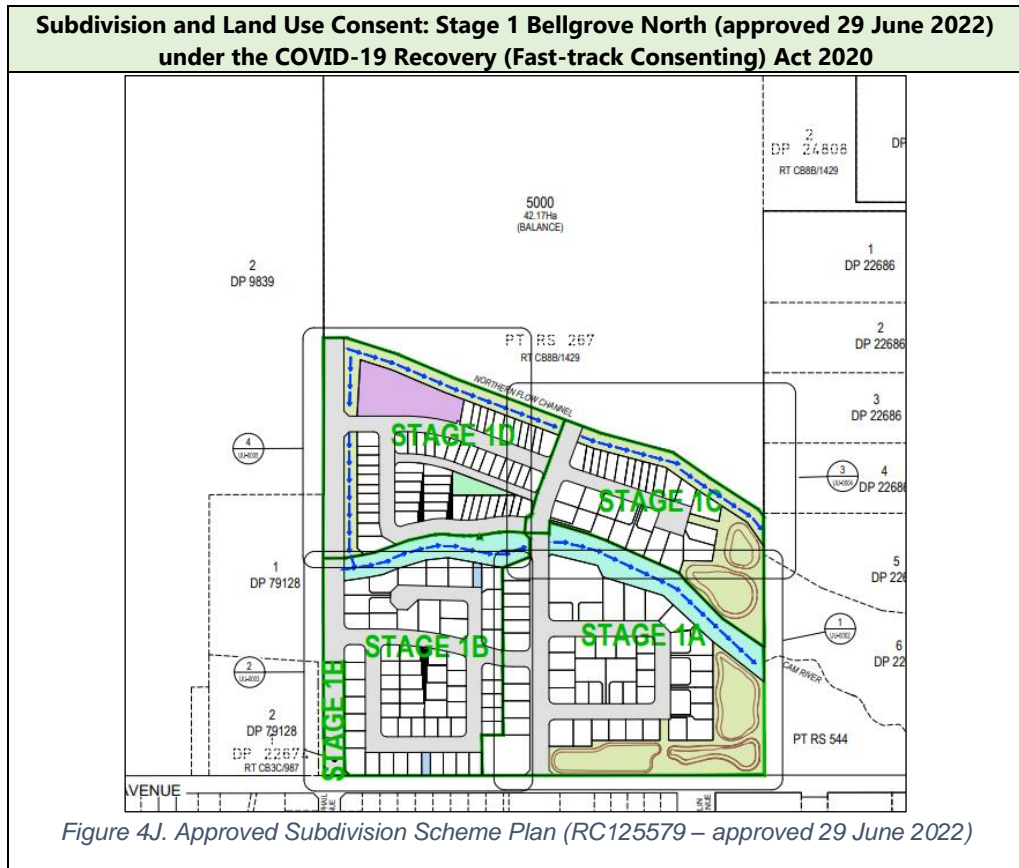


Figure 4I5. SER ODP included in the pWDP (September 2021)



Infrastructure Acceleration Fund Agreement– October 2022



Figure 4L. Attachment A 'Land Map' of the IAF Housing Outcomes Agreement between Kainga Ora, WDC and Bellgrove - dated October 2022

Bellgrove Stage 1 Consent Amendment - October 2023

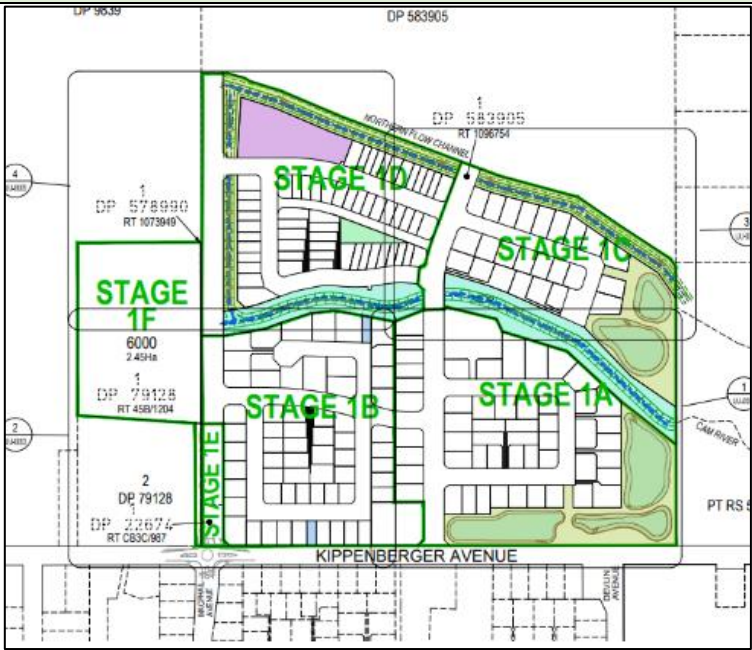


Figure 4M. RC215579 Subdivision Consent approving minor amendments to the Stage 1 subdivision consent - dated October 2023

Greater Christchurch Spatial Plan – endorsed March 2024

Map 2: The Greater Christchurch spatial strategy (1 million people)

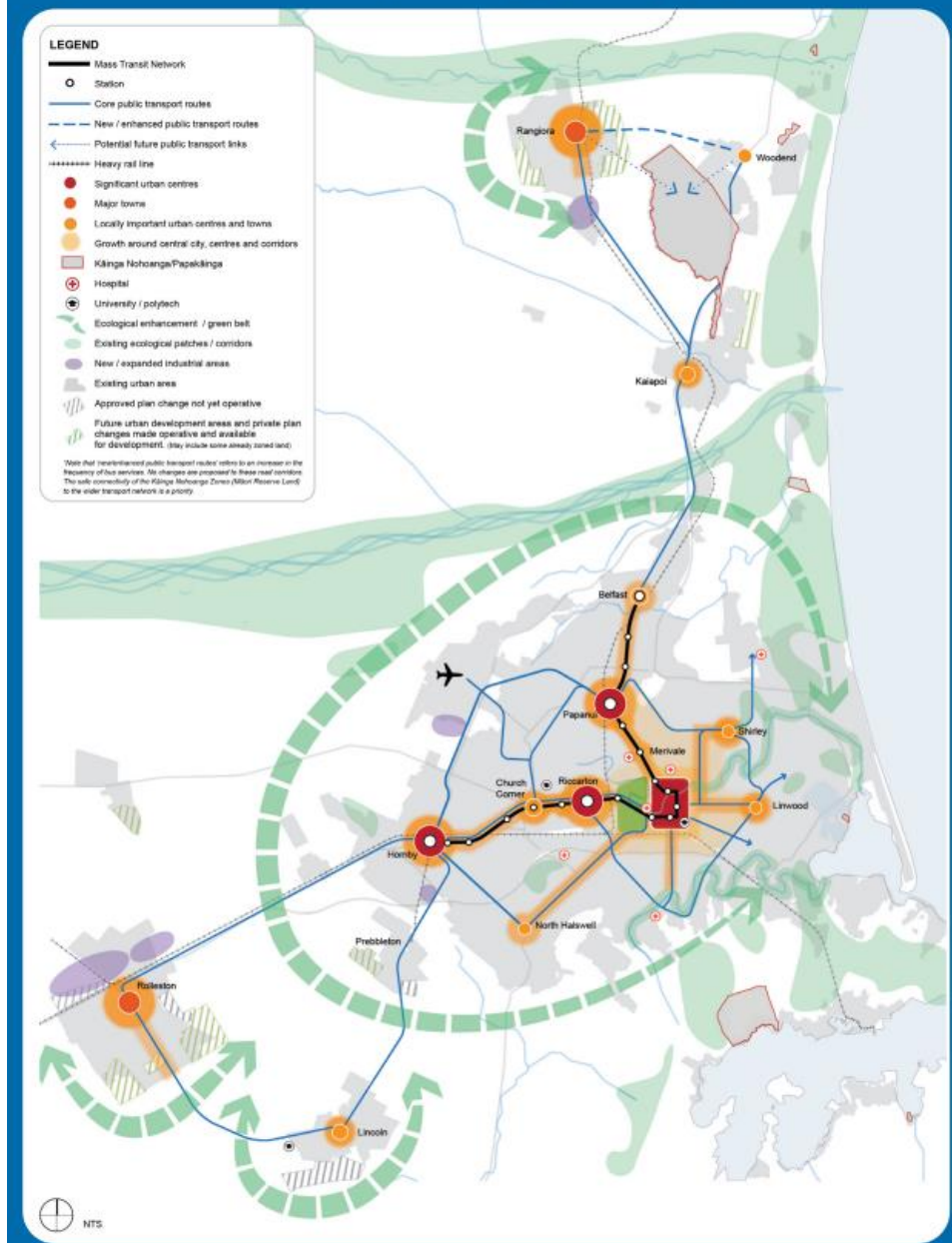


Figure 4N. Map 2 of the GCSP showing the Spatial Strategy for Greater Christchurch

ATTACHMENT 5: BELLGROVE SOUTH LAND HOLDING HISTORY

Lot 2 DP 452196 is a 14-ha lot held by BRL (Figure 5A), contained within Record of Title 577722. Title was issued for the lot 13 July 2012. It has access to Northbrook Road, Rangiora.



Figure 5A. Lot 2 DP 452196 geographical extent

Lot 2 DP 452196 was previously held within Record of Title CB45D/1257 (Lot 2 DP 80275) as a 20.10 ha allotment, issued 6 July 1999 (Figure 5B). The lot extended from Northbrook Road in the South through to Rangiora Woodend Road in the North.

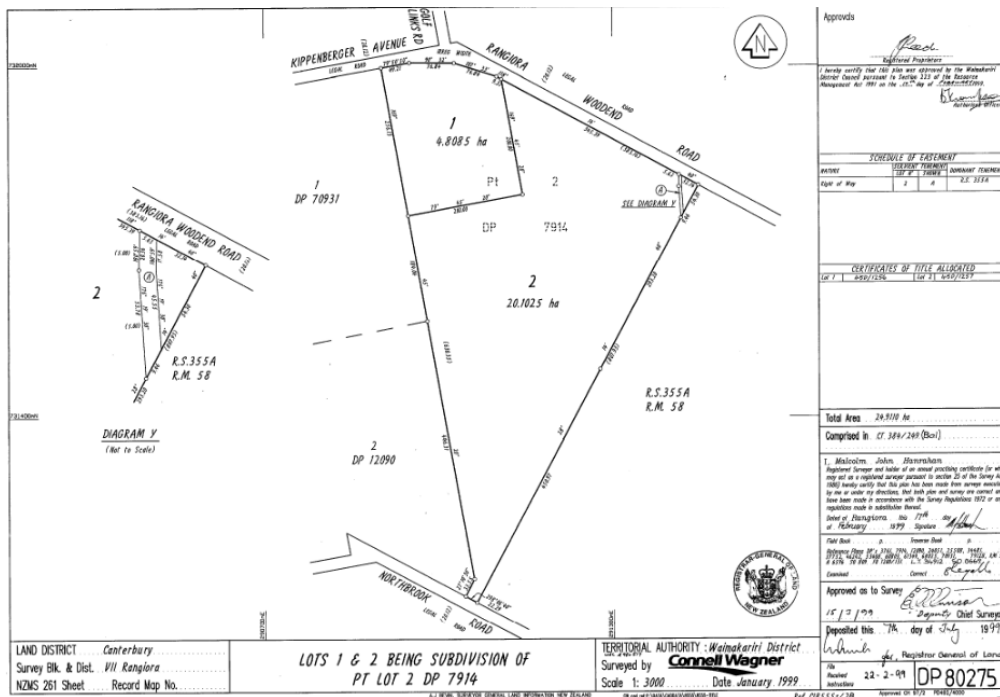


Figure 5B. Survey Plan of the former Lot 2 DP 80275

Prior, the land was held within title CB384/249 issued 31 December 1869.

ATTACHMENT 6: SECTION 32 RMA ASSESSMENT FOR PWDP: BRL REZONING OF BELLGROVE SOUTH, RANGIORA

228 Section 32AA(1)(A) of the RMA requires a further evaluation in respect of the amendments sought to the existing proposal since the section 32 evaluation was completed. Section 32AA(1)(b) states that the further evaluation must be undertaken in accordance with sections 32(1) to (4), while section 32AA(c) requires that the level of detail must correspond to the scale and significance of the changes.

229 Section 32(1)(a) requires that an evaluation must examine the extent to which the objectives of the proposal are the most appropriate way to achieve the purpose of the RMA. No alterations are proposed to the pWDP Objectives and in accordance with section 32AA(1)(a), no evaluation of the existing objectives is required.

pWDP Objectives

230 Section 32(1)(b) requires examination of whether the proposed rezoning provisions are the most appropriate way of achieving the District Plan objectives. These are assessed in Table 6-1 below.

Table 6-1. Assessment of the rezoning against the pWDP Objectives

pWDP Objective¹⁰⁵	Assessment
SD: Strategic Directions	
<p>Objective SD-O1 Natural environment</p> <p><i>Across the District:</i></p> <ol style="list-style-type: none"> 1. <i>there is an overall net gain in the quality and quantity of indigenous ecosystems and habitat, and indigenous biodiversity;</i> 2. <i>the natural character of the coastal environment, freshwater bodies and wetlands is preserved or enhanced, or restored where degradation has occurred;</i> 3. <i>outstanding natural features and outstanding natural landscapes are identified and their values recognised and protected;</i> 4. <i>people have access to a network of natural areas for open space and recreation, conservation and education, including within riparian areas, the coastal environment, the western ranges, and within urban environments; and</i> 	<p>The Proposal appropriately manages the natural environment through the revised SER-ODP which ensures the Cam/Ruataniwha River is appropriately protected and maintained through the provision of an esplanade reserve and open space reserve. In addition, the spring located near the eastern boundary will be incorporated into the SMA area, ensuring it is appropriately safeguarded in accordance with the provisions of the pWDP.</p> <p>Dr Tracy-Mines concludes that the rezoning is likely to result</p>

¹⁰⁵ The versions of the Objectives are those notified in the pWDP (and include the amendments sought by Variation 1 (shown in blue)).

<p>5. <i>land and water resources are managed through an integrated approach which recognises the importance of ki uta ki tai to Ngāi Tahu and the wider community, and the inter-relationships between ecosystems, natural processes and with freshwater.</i></p>	<p>in a net gain indigenous biodiversity (1).</p> <p>No wetlands have been identified on Site and the natural character of the Cam/Ruataniwha Rivver will be preserved and enhanced through the establishment of appropriate riparian margins (2).</p> <p>The Site does not contain outstanding natural features or landscapes (3).</p> <p>The Rezoning provides increased public access to open space and riparian margins (specifically to the Cam / Ruataniwha River) (4).</p>
<p>Objective SD-02 Well-functioning urban environments</p> <p><i>Waimakariri District contains 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.</i></p>	<p>The Proposal will contribute to Rangiora being a well-functioning urban environment, integrating appropriately with both existing and future anticipated development.</p>
<p>Objective SD-O23 Urban development</p> <p><i>Urban development and infrastructure that:</i></p> <ol style="list-style-type: none"> 1. <i>is consolidated and integrated with the urban environment;</i> 2. <i>that recognises existing character, amenity values, and is attractive and functional to residents, businesses and visitors;</i> 3. <i>utilises the District Council's reticulated wastewater system, and potable water supply and stormwater infrastructure where available;</i> 4. <i>provides a range of housing opportunities, focusing new residential activity within existing towns, and identified development areas in Rangiora and Kaiapoi, in order to achieve the housing bottom lines in UFD-O1;</i> 5. <i>supports a hierarchy of urban centres, with the District's main centres in Rangiora, Kaiapoi, Oxford and Woodend being:</i> <ol style="list-style-type: none"> a. <i>the primary centres for community facilities;</i> b. <i>the primary focus for retail, office and other commercial activity; and</i> c. <i>the focus around which residential development and intensification can occur....</i> 7. <i>provides people with access to a network of spaces within urban environments for open space and recreation; ...</i> 	<p>The Proposal will enable a consolidated and well-integrated development to occur in a location long earmarked for urban growth in the higher order planning documents and spatial plans (1).</p> <p>The Proposal considers the existing rural and residential character in the development of its boundary interface treatment which includes the provision of a green link along the eastern boundary with the rural land (2) and would utilise and or provide the necessary updates to the WDC's reticulated wastewater system, and potable water supply and stormwater infrastructure (3).</p> <p>A range of housing opportunities (and section sizes) will be provided for by the MRZ zoning (4).</p> <p>The revised SER-ODP includes a comprehensive green</p>

<p>recognise and support Ngāi Tūāhuriri cultural values through the protection of sites and areas of significance to Māori identified in SASM-SCHED1.</p>	<p>space network and provides additional open space areas within the Site over that shown in the notified SER ODP.</p>								
<p>Objective SD-O45 Rural land</p> <p>Outside of identified residential development areas and the Special Purpose Zone (Kāinga Nohoanga), rural land is managed to ensure that it remains available for productive rural activities by:</p> <ol style="list-style-type: none"> 1. providing for rural production activities, activities that directly support rural production activities and activities reliant on the natural resources of Rural Zones and limit other activities; and 2. ensuring that within rural areas the establishment and operation of rural production activities are not limited by new incompatible sensitive activities. 	<p>Bellgrove South is located almost entirely within an identified residential development area and as a result Objective SD-05 does not apply.</p> <p>Regarding the Additional Land, it is noted that if this was to remain 'rural' its ability to support productive activities would be restricted by its size, location adjacent to medium density housing, and limited access through an urban area as outlined in the evidence of Mr Dunham.</p>								
<p>Objective SD-067 - Natural hazards and resilience</p> <p>The District responds to natural hazard risk, including increased risk as a result of climate change, through:</p> <ol style="list-style-type: none"> 1. avoiding subdivision, use and development where the risk is unacceptable; and 2. mitigating other natural hazard risks. 	<p>The Site is not within an area exposed to an unacceptable risk of natural hazards, with flood risk and liquefaction risk able to be effectively mitigated. Development of the Site can be designed in accordance with the applicable Building Code requirements to ensure that flooding, liquefaction and seismicity is managed appropriately.</p>								
<p>UFD - Āhuratanga auaha ā tāone - Urban Form and Development</p>									
<p>Objective UFD-01 Feasible Development Capacity for Residential activities</p> <p>Sufficient feasible development capacity for residential activity to meet specified housing bottom lines and a changing demographic profile of the District as follows:</p> <table border="1" data-bbox="486 1568 1101 1798"> <thead> <tr> <th>Term</th> <th>Short to Medium Term (2018-2028)</th> <th>Long Term (2028-2048)</th> <th>30 Year Time frame (2018-2048)</th> </tr> </thead> <tbody> <tr> <td>Housing Bottom Lines (Development Capacity)</td> <td>6,300 Residential Units</td> <td>7,100 Residential Units</td> <td>13,400 Residential Units</td> </tr> </tbody> </table>	Term	Short to Medium Term (2018-2028)	Long Term (2028-2048)	30 Year Time frame (2018-2048)	Housing Bottom Lines (Development Capacity)	6,300 Residential Units	7,100 Residential Units	13,400 Residential Units	<p>Mr Colegrave considers that the feasible capacity estimates cited to prepare the pWDP are not up to date and that the District will (based on the notified zoning of the pWDP) face a significant, widespread shortage of feasible capacity to meet demand, with a lot more needed (which this Proposal assists to achieve)¹⁰⁶.</p>
Term	Short to Medium Term (2018-2028)	Long Term (2028-2048)	30 Year Time frame (2018-2048)						
Housing Bottom Lines (Development Capacity)	6,300 Residential Units	7,100 Residential Units	13,400 Residential Units						
<p>TRAN - Ranga waka - Transport</p>									
<p>Objective TRAN-01 A safe, resilient, efficient, integrated and sustainable transport system</p> <p>An integrated transport system, including those parts of the transport system that form part of critical infrastructure,</p>	<p>The revised SER-ODP would provide an integrated transport system that is safe and efficient, whilst</p>								

¹⁰⁶ Economic Evidence of Mr Colegrave, para 15-16

<p><i>strategic infrastructure, regionally significant infrastructure, and strategic transport networks, that:</i></p> <ol style="list-style-type: none"> 1. <i>is safe, resilient, efficient and sustainable for all transport modes;</i> 2. <i>is responsive to future needs and changing technology;</i> 3. <i>enables economic development, including for freight;</i> 4. <i>supports healthy and liveable communities;</i> 5. <i>reduces dependency on private motor vehicles, including through public transport and active transport; and</i> 6. <i>enables the economic, social, cultural and environmental well-being of people and communities.</i> 	<p>supportive of a reduction in dependency on private motor vehicles through the provision of a well-integrated network of pedestrian and cycle paths and good access to public transport.</p> <p>Mr Collins concludes that the rezoning to MRZ and associated revised SER-ODP is consistent with this Objective¹⁰⁷.</p>
NATC - Āhuatanga o te awa - Natural Character of Freshwater Bodies	
<p>Objective NATC-O1 Preservation of natural character</p> <p><i>The preservation of the natural character of the surface freshwater environment, its wetlands, and lakes and rivers and their margins.</i></p>	<p>The Proposal will give effect to this Objective through appropriate provisions on the revised SER-ODP related to the scheduled Cam / Ruataniwha River and the underlying provisions of the pWDP applying to any other freshwater environments on Site that meet the 'river' definition in the pWDP.</p>
<p>Objective NATC-O2 Restoration of natural character</p> <p><i>Restoration of the natural character of surface freshwater bodies and their margins where degradation has occurred.</i></p>	<p>The Cam / Ruataniwha River is the only waterway within the Site identified as a scheduled natural character freshwater body in the pWDP. The provision of an esplanade reserve, riparian planting and building setbacks adjacent to the river will assist in improving the ecological values in accordance with this Objective.</p>
<p>Objective NATC-O3 Use of freshwater body margins</p> <p><i>The use of wetlands, and lakes and rivers and their margins are managed to preserve their natural character.</i></p>	<p>The Ecological Evidence of Dr Tracy-Mines concludes that MRZ zoning of the Site and future development in accordance with the revised SER-ODP would likely result in a biodiversity net gain¹⁰⁸.</p>

¹⁰⁷ Transport Evidence of Mr Collins, para 98

¹⁰⁸ Ecological Evidence of Dr Tracy-Mines, para 96

SUB - Wāwāhia whenua - Subdivision	
<p>Objective SUB-01 Subdivision design</p> <p><i>Subdivision design achieves an integrated pattern of land use, development, and urban form, that:</i></p> <ol style="list-style-type: none"> <i>provides for anticipated land use and density that achieve the identified future character, form or function of zones;</i> <i>consolidates urban development and maintains rural character except where required for, and identified by, the District Council for urban development;</i> <i>supports protection of cultural and heritage values, conservation values; and</i> <i>supports community resilience to climate change and risk from natural hazards.</i> 	<p>The revised SER-ODP will provide for the establishment of an integrated pattern of land use, development and urban form that incorporates a legible and accessible, well connected transport system.</p> <p>Future subdivision in accordance with the revised SER-ODP will be able to deliver a variety of allotment sizes, catering for different house types in a manner that reflects the character, amenity values, form and function anticipated for the MRZ of the pWDP.</p>
<p>Objective SUB-02 Infrastructure and transport</p> <p><i>Efficient and sustainable provision, use and maintenance of infrastructure; and a legible, accessible, well connected transport system for all transport modes.</i></p>	
RESZ – Whaitua Nohonoho – Residential Zones	
<p>Objective RESZ-01 Residential growth, location and timing</p> <p><i>Sustainable residential growth that:</i></p> <ol style="list-style-type: none"> <i>provides more housing in appropriate locations in a timely manner according to growth needs;</i> <i>is responsive to community and district needs; and</i> <i>enables new development, as well as redevelopment of existing Residential Zones.</i> 	<p>The Site is located within an area identified for urban growth, providing housing in a timely manner to respond to growth needs.</p> <p>The Additional Land is small in area (3.3ha) and as a result its inclusion within the rezoning, SER-DA and SER-ODP still demonstrates sustainable growth of Rangiora being appropriately located adjacent to planned urban growth.</p>
<p>Objective RESZ-02 Residential sustainability</p> <p><i>Efficient and sustainable use of residential land and infrastructure is provided through appropriate location of development and its design.</i></p>	
<p>Objective RESZ-03 Residential form, scale, design and amenity values</p> <p><i>A form, scale and design of development that:</i></p> <ol style="list-style-type: none"> <i>achieves a good quality residential environment that is attractive and functional;</i> <i>supports community health, safety and well-being;</i> <i>maintains differences between zones; and</i> <i>manages adverse effects on the surrounding environment.</i> 	<p>Adverse effects on the surrounding environment will be managed through appropriate boundary treatment in accordance with the revised SER-ODP and Objective RES-03.</p> <p>Boundary treatments for those rural neighbouring properties to the east and south will no longer have a rural outlook and to offset this a combination of boundary setbacks including building setbacks, open space, fencing and landscaping will be used.</p>
<p>MRZ-01 Housing types and sizes</p>	<p>The rezoning will enable the provision of a range of housing typologies</p>

<p><i>The Medium Density Residential Zone provides for a variety of housing types and sizes that respond to:</i></p> <p><i>i. housing needs and demand; and</i></p> <p><i>ii. the neighbourhood's planned urban built character, including 3-storey buildings.</i></p>	<p>with the concept lot layout showing lots ranging in size from approximately 250m² to approximately 860m² reflecting the planned urban built character of the MRZ, and an overall yield exceeding 15 households per hectare. .</p>
RURZ – Whaitua Taiwhenua – Rural Zone	
<p>Objective RURZ–01 Rural Environment</p> <p><i>An environment with a predominant land use character comprising primary production activities and natural environment values, where rural openness dominates over built form, while recognising:</i></p> <ol style="list-style-type: none"> <i>1. the east of the District has a predominant character of small rural sites with a pattern of built form of residential units and structures at more regular intervals at a low density compared to urban environments; and</i> <i>2. the remainder of the District, while having a range in the size of rural sites, has a predominant character of larger rural sites with a corresponding density of residential units and built form.</i> 	<p>The Site is located within the SER DA, except for the Additional Land.</p> <p>The SER-DA provides for the future urban development RLZ land, acknowledging the higher order planning documents which have identified this area as an appropriate location for new greenfield urban development.</p> <p>The inclusion of Additional Land would reduce the quantity of rural land in the district by approximately 3.3 ha. Given the economic challenges with farming or finding a productive rural land use of a block so small in scale adjacent to urban development, and the size of this area in the scale of the district, the impact of the loss of this rural land within the district is not regarded as significant.</p>
<p>Objective RURZ–02 Activities in Rural Zones</p> <p><i>Rural Zones support primary production activities, activities which directly support primary production, and activities with a functional need to be located within Rural Zones.</i></p>	
<p>RLZ-01 -Purpose of the Rural Lifestyle Zone</p> <p><i>Primary production activities and activities reliant on the natural and physical resources of the rural environment occur while recognising that the predominant character is small rural sites with a more intensive pattern of land use and buildings than the General Rural Zone.</i></p>	

231 On the basis of the above assessment, I conclude that the Rezoning is consistent with the pWDP Objectives.

Efficiency and Effectiveness

232 In assessing the benefits and costs of the Rezoning, the following options are considered:

- (a) Option 1: Retain the proposed zoning (RLZ);
- (b) Option 2: Retain the proposed zoning (RLZ) and enable the release of land subject to a certification provision or similar;
- (c) Option 3: Rezone the Site to MRZ in accordance with the Proposal including the revised SER-ODP; and
- (d) Option 4: Rezone the Site (excluding area of Additional Land) to MRZ in accordance with a revised SER-ODP (that captures the

changes sought by BRL except for where they relate to the Additional Land); and

- (e) Option 5: Resource Consent –non-complying subdivision and land use consents for residential use.

233 The benefits and costs of each option are outlined in Table 6-2 below:

Table 6-2. Benefits and costs assessment

Benefits	Costs
<i>Option 1: Retain the proposed zoning (RLZ)</i>	
<ul style="list-style-type: none"> Retains existing rural character and amenity and existing rural use. No additional capacity for stormwater / wastewater required. 	<ul style="list-style-type: none"> On-going opportunity costs for landowners. Demand for residential property in the District at risk of not being met, resulting in increased property prices for this land type and a lack of plan-enabled housing capacity in the District.
<i>Option 2: Retain the proposed zoning (RLZ) and enable the release of land subject to a certification provision or similar</i>	
<ul style="list-style-type: none"> Retains existing rural character and amenity and existing rural use. Release of land for residential development 'less responsive' than a rezoning. 	<ul style="list-style-type: none"> Time and money cost to submitter to seek certification release of the land (cost and timeframes yet to be determined). Requires certification and subdivision consent and plan change in the long term. Uncertainty that the certification process will be retained in the pWDP and as a result land may not be enabled for release. Does not contribute to Rangiora housing stock or contribute to providing for projected increase in population (within the short term).
<i>Option 3: Rezone the Site to MRZ in accordance with the Revised SER-ODP</i>	
<ul style="list-style-type: none"> More households located in eastern Rangiora which is has been identified as a suitable location (within 2km of the town centre) and to help support the township services/ amenities and facilities. 	<ul style="list-style-type: none"> Time and money cost to submitter for submission processes and technical reports. Loss of rural land and rural outlook.

<ul style="list-style-type: none"> • Additional MRZ land is appropriately located to ensure consolidated and sustainable development of Rangiora in a location where housing demand is not currently met within the pWDP. • Opportunity for enhancement of onsite waterways, including the establishment of an esplanade reserve adjacent to the Cam/Ruataniwha River. • Additional stormwater treatment and reserve areas provided offering enhanced green space and recreation opportunities in Eastern Rangiora. • Provides Waimakariri and more specifically Rangiora with a range of allotment sizes (indicative concept lot layout suggests lots as small as approximately 250m²) providing increased residential diversity. • Provides a planning framework that enables a residential development outcome on the site while appropriately managing the amenity of adjoining rural lifestyle zone. • Economic benefits resulting from: <ul style="list-style-type: none"> ○ approximately 363 additional residential allotments; ○ Short-medium term employment opportunities during construction; and ○ Enables development certainty without further plan change rezoning costs. 	<ul style="list-style-type: none"> • Economic cost of the development of the associated services and roading (for the landowner).
<p><i>Option 4: Rezone the Site (excluding Additional Land) to MRZ in accordance with a revised SER-ODP;</i></p>	
<ul style="list-style-type: none"> • Majority of the Site would be available to be immediately enabled for residential development. • Economic benefits resulting from: <ul style="list-style-type: none"> ▪ approximately 335 additional residential allotments; ▪ Short-medium term employment opportunities during construction. 	<ul style="list-style-type: none"> • Additional Land would remain as a non-complying rural lot with no rural productivity options available to generate sufficient income to breakeven. • Additional Land would effectively be land locked, required to be accessed through an area of Medium Density Residential development.

<ul style="list-style-type: none"> • Enables development certainty without further plan change rezoning costs. 	<ul style="list-style-type: none"> • Missed opportunities to create a well-integrated, well-functioning urban environment with the Additional Land and to efficiently develop the Additional Land at the same time as the wider Bellgrove South block. • Approximately 28 residential lots would not be enabled (not giving effect to the IAF agreement which anticipates residential development on this Site) and reducing housing development capacity in Rangiora in the short term. • Developing the Additional Land would require a non-complying subdivision and land use consent and is approval not guaranteed – equating to time, money and uncertainty for the development.
<p><i>Option 5: Resource Consent</i></p>	
<ul style="list-style-type: none"> • No rezoning required. 	<ul style="list-style-type: none"> • Time and money cost to submitter for submission processes and technical reports to support a non-complying resource consent process. • Consents unlikely to be approved as the development would exceed the permitted RLZ dwelling density standards & the policy framework requires higher densities to be 'avoided'. • Least effective and efficient given the uncertainty of the consent process. Potential for integration with the township utilities to be less planned. • The least responsive of options which enable future urban development on the Site.

- 235 Option 3 is the preferred option as the benefits outweigh the costs. The costs outweigh the benefits with respect of Option 1, 2, 4 and 5.
- 236 The rezoning of the Site along with the modifications sought to the SER-ODP, is the most efficient and effective means of achieving the proposed relief and objectives of the pWDP. The rezoning would contribute 363 additional residential houses to Rangiora, helping WDC demonstrate plan-enabled capacity and responsiveness to the provision of housing development capacity in the District.

Risk of Acting or Not Acting

- 237 The supporting technical evidence does not identify any fundamental risks of the Rezoning and confirms the suitability of the Site for MRZ development. This information has been provided at a level of detail that is appropriate to the rezoning. Additional technical information to further investigate such matters as the effects of raising the Site would be undertaken prior to detailed design and subdivision. This creates a risk of action, however it is considered small, given a resource consent process would be required in respect of ensuring that the technical matters have been appropriately assessed and designed for in the future development of the Site. The further assessment through the resource consent process enables appropriate management of this risk.
- 238 Risks associated with not acting include a shortfall of rural residential land within the district being identified as part of the pWDP process. Not acting now would under cater for residential land use demand in the wider Waimakariri District and at Rangiora. This is likely to result in continuing increase to land and house prices. This may result in WDC not meeting its obligations under the NPS-UD.

Overall Assessment

- 239 In summary, I consider the Proposal the most appropriate approach, having had regard to matters of efficiency and effectiveness, to achieve the Objectives of the pWDP.
- 240 Option 3 is the most consistent with a range of pWDP policies especially as it supports the strategic directions signalled in the pWDP and NPS-UD.
- 241 Option 3 is the most appropriate given:

- (a) The rezoning adopts a pWDP zone, and development and activity standards. This ensures continuity of District Plan anticipated environmental outcomes for the MRZ zone.
 - (b) This Site is close to the Rangiora town centre and community facilities.
 - (c) It will be consistent with, and give effect to, the relevant proposed District Plan objectives and policies;
 - (d) It is a logical extension to the developed residential land within Rangiora and largely in accordance with the urban growth outcomes of Greater Christchurch in the higher order planning documents;
 - (e) There is no additional cost to the WDC in re-zoning the Site as proposed as there is capacity in the planned public utilities and the planned road network to accommodate the traffic effects from the development; and
 - (f) The revised SER-ODP provides certainty of the final form and disposition of the re-zoned area for roading, and will provide a well-functioning urban environment.
- 242 The economic, social and environmental benefits of the proposal outweigh the potential costs.
- 243 The rezoning is considered to be the most appropriate, efficient and effective means of achieving the purpose of the RMA.

ATTACHMENT 7: ASSESSMENT OF THE NPS-UD

Table 7-1. Assessment of the Proposal against the NPS-UD.

NPS-UD Provision	Assessment
<p>Objective 1: <i>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.</i></p>	<p>Policy 1 sets out the relevant criteria for what constitutes a well-functioning urban environment and is assessed below.</p>
<p>Objective 2: <i>Planning decisions improve housing affordability by supporting competitive land and development markets</i></p>	<p>The Proposal will improve housing affordability¹⁰⁹ by providing additional capacity to meet demand helping support competitive land and development markets in the District and wider region.</p>
<p>Objective 3: <i>Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:</i></p> <p>(a) <i>the area is in or near a centre zone or other area with many employment opportunities;</i></p> <p>(b) <i>the area is well-served by existing or planned public transport; and</i></p> <p>(c) <i>there is high demand for housing or for business land in the area, relative to other areas within the urban environment.</i></p>	<p>The Site is directly adjacent to the existing urban environment of Rangiora¹¹⁰ where there an area where there is high demand for residential housing.</p> <p>The Site is well served by existing public transport¹¹¹ and is located less than 2km from the Rangiora Town Centre and General Industrial Zone¹¹² being areas with many employment opportunities.</p>
<p>Objective 4: <i>New Zealand's urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.</i></p>	<p>As outlined above regarding the effects on character, amenity and landscape, development enabled by rezoning the Site will enable the comprehensive development of Rangiora in general accordance with higher order planning documents. It is acknowledged that MRZ is a departure from what would up to now be considered a 'normal' or traditional and familiar</p>

¹⁰⁹ Economic Evidence of Mr Colegrave para 75

¹¹⁰ Economic Evidence of Mr Colegrave para 33-36

¹¹¹ Transport Evidence of Mr Collins para 45

¹¹² Transport Evidence of Mr Collins para 29

	residential development for Rangiora and this difference in itself may create an effect some would consider to be adverse.
Objective 5: <i>Planning decisions relating to urban environments, and FDSs, take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).</i>	The development of the higher order planning documents which identify the Site for future urban development have been prepared taking into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi). Further detailed development consideration will be given to the principles prior to subdivision to ensure that cultural values are appropriately considered and engagement with tāngata whenua undertaken as appropriate.
Objective 6: <i>Local authority decisions on urban development that affect urban environments are: integrated with infrastructure planning and funding decisions; and strategic over the medium term and long term; and responsive, particularly in relation to rezonings that would supply significant development capacity.</i>	Except for the small area of Additional Land, the Site is located within an area identified for future urban development, supporting the integration of the development with infrastructure planning and funding decisions. The future development of the Site can be effectively integrated with infrastructure planning, funding and delivery as outlined by the evidence of Mr Trist and Mr Collins. The Site is in a location identified as being strategic over the medium to long term and this is confirmed through its inclusion as a FDA in the CRPS and more recently within the GCSP.
Objective 7: <i>Local authorities have robust and frequently updated information about their urban environments and use it to inform planning decisions.</i>	Mr Colegrave outlines concerns relating to the appropriateness of the housing development capacity information being used to inform the pWDP ¹¹³ concluding that the rezoning would help plug a looming gap in feasible capacity by providing quality, master-planned housing that is in step with market demand and able to be realised at both pace and scale ¹¹⁴ .
Objective 8: <i>New Zealand's urban environments: support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change.</i>	The location of the Site and the layout of the revised SER-ODP, within 2km of the Rangiora Town Centre, with good access to public transport, along with the provision of a well-integrated network of pedestrian and cycle paths, is anticipated to assist in encouraging alternative transport modes that support reductions in greenhouse gas emissions. Future detailed subdivision design will consider the effects of climate change in the design of overland flows, finished floor levels, and the stormwater management system.
Policy 1: <i>Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:</i> (a) <i>have or enable a variety of homes that:</i>	The Proposal will enable the development of a variety of homes by providing for a range of lot sizes, which will enable the development of a variety of dwellings over time. The Proposal

¹¹³ Economic Evidence of Mr Colegrave para 67

¹¹⁴ Economic Evidence of Mr Colegrave para 74

<p>(i) <i>meet the needs, in terms of type, price, and location, of different households; and</i></p> <p>(ii) <i>enable Māori to express their cultural traditions and norms; and</i></p> <p>(b) <i>have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and</i></p> <p>(c) <i>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</i></p> <p>(d) <i>support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and</i></p> <p>(e) <i>support reductions in greenhouse gas emissions; and</i></p> <p>(f) <i>are resilient to the likely current and future effects of climate change.</i></p>	<p>will result in the development of sections that are smaller than the existing Rangiora residential stock¹¹⁵, giving effect to (a) and (b).</p> <p>The Site has good accessibility¹¹⁶ situated directly adjacent to the existing Rangiora urban area and being within walking and cycling distance of many amenities giving effect to (c).</p> <p>The rezoning is anticipated to positively impact the competitive operation of land and development markets, resulting in improved housing affordability¹¹⁷, giving effect to (d).</p> <p>In relation to reductions in greenhouse gas emissions (e) I refer to my assessment above in relation to Objective 8.</p> <p>Lastly, regarding climate change resilience (f) I note that prior to subdivision development a detailed and comprehensive surface water management scheme will be developed to manage the effects of increased areas of impermeable ground cover on the local drainage network and that this will take into account the likely effects of climate change.</p>
<p>Policy 2: <i>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.</i></p>	<p>The Proposal will help ensure feasible capacity is provided in a way that is aligned with market demand and able to be realised at both pace and scale¹¹⁸.</p>
<p>Policy 3: <i>In relation to tier 1 urban environments, regional policy statements and district plans enable:</i></p> <p>(a) <i>in city centre zones, building heights and density of urban form to realise as much development capacity as possible, to maximise benefits of intensification; and</i></p>	<p>Not Applicable</p> <p>The Site is not within a city centre zone, metropolitan centre zone, within a walkable catchment of any of the areas specified by (c). In addition, it is not adjacent to the areas specified by (d).</p>

¹¹⁵ Economic Evidence of Mr Colegrave para 82

¹¹⁶ Transport Evidence of Mr Collins para 899

¹¹⁷ Economic Evidence of Mr Colegrave para 75

¹¹⁸ Economic Evidence of Mr Colegrave para 16.

<p>(b) <i>in metropolitan centre zones, building heights and density of urban form to reflect demand for housing and business use in those locations, and in all cases building heights of at least 6 storeys; and</i></p> <p>(c) <i>building heights of at least 6 storeys within at least a walkable catchment of the following: (i) existing and planned rapid transit stops (ii) the edge of city centre zones (iii) the edge of metropolitan centre zones; and</i></p> <p>(d) <i>within and adjacent to neighbourhood centre zones, local centre zones, and town centre zones (or equivalent), building heights and densities of urban form commensurate with the level of commercial activity and community services.</i></p>	
<p>Policy 4: <i>Regional policy statements and district plans applying to tier 1 urban environments modify the relevant building height or density requirements under Policy 3 only to the extent necessary (as specified in subpart 6) to accommodate a qualifying matter in that area.</i></p>	<p>Not Applicable</p> <p>As per the assessment for Policy 3.</p>
<p>Policy 5: <i>Regional policy statements and district plans applying to tier 2 and 3 urban environments enable heights and density of urban form commensurate with the greater of:</i></p> <p>(a) <i>the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services; or</i></p> <p>(b) <i>relative demand for housing and business use in that location.</i></p>	<p>Not Applicable</p> <p>The site is within the Greater Christchurch Tier 1 Urban Environment instead of tier 2 and 3.</p>
<p>Policy 6: <i>When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters:</i></p> <p>(a) <i>the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement</i></p> <p>(b) <i>that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes:</i></p>	<p>The Proposal generally gives effect to the planned urban built form anticipated by RMA planning documents including Our Space, the CRPS, and the GCSP.</p> <p>However, it is worth noting that while the CRPS largely gives effect to the NPS-UD (for example the incorporation of the housing bottom lines in accordance with Clause 3.6 of the NPS-UD at Objective 6.2.1a), it has not yet given full effect to the objectives and policies of the NPS-UD related to responsiveness and out of sequence development such as the criteria directed by clause 3.8(3)). This is of particular relevance to the Site (including the Additional Land) which seeks rezoning to ensure appropriate plan enabled capacity is available to meet demand.</p>

<p>(i) <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</i></p> <p>(ii) <i>are not, of themselves, an adverse effect</i></p> <p>(c) <i>the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1);</i></p> <p>(d) <i>any relevant contribution that will be made to meeting the requirements of this National Policy Statement to provide or realise development capacity;</i></p> <p>(e) <i>the likely current and future effects of climate change.</i></p>	<p>In relation to (b) I note that giving effect to planned urban built form identified within the higher order planning documents will alter the existing urban form and landscape of the South-East Rangiora area and it is acknowledged that MRZ is a departure from what would up to now be considered a 'normal' or traditional and familiar residential development for Rangiora and this difference in itself may create an effect some would consider to be adverse.</p>
<p>Policy 7: <i>Tier 1 and 2 local authorities set housing bottom lines for the short-medium term and the long term in their regional policy statements and district plans.</i></p>	<p>This is an action on the local authority (WDC). WDC have responded to the NPS-UD by proposing housing bottom lines for the short-medium term and the long term in their pWDP. The rezoning will assist in achieving the housing bottom lines in the District and as outlined by Mr Colegrave's evidence is essential for doing so given he does not consider that there is sufficient capacity currently proposed to be enabled to meet demand¹¹⁹.</p>
<p>Policy 8: <i>Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well functioning urban environments, even if the development capacity is:</i></p> <p>(a) <i>unanticipated by RMA planning documents; or</i></p> <p>(b) <i>out-of-sequence with planned land release.</i></p>	<p>Policy 8 applies to the Additional Land which is unanticipated by the RMA planning documents for Greater Christchurch. It's rezoning to MRZ would enable future development capacity¹²⁰ that would significantly contribute to a well-functioning urban environment (refer to the assessment of Policy 1 above).</p>
<p>Policy 9: <i>Local authorities, in taking account of the principles of the Treaty of Waitangi (Te Tiriti o Waitangi) in relation to urban environments, must:</i></p>	<p>The development of the higher order planning documents which identify the Site for future urban development have been prepared taking into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi). Further detailed development consideration will be given to the principles prior to subdivision to ensure that cultural values are appropriately considered and engagement with tāngata whenua undertaken as appropriate.</p>

¹¹⁹ Economic Evidence of Mr Colegrave para 16.

¹²⁰ Economic Evidence of Mr Colegrave para 16.

<p>(a) <i>involve hapū and iwi in the preparation of RMA planning documents and any FDSs by undertaking effective consultation that is early, meaningful and, as far as practicable, in accordance with tikanga Māori; and</i></p> <p>(b) <i>when preparing RMA planning documents and FDSs, take into account the values and aspirations of hapū and iwi for urban development; and</i></p> <p>(c) <i>provide opportunities in appropriate circumstances for Māori involvement in decision-making on resource consents, designations, heritage orders, and water conservation orders, including in relation to sites of significance to Māori and issues of cultural significance; and</i></p> <p>(d) <i>operate in a way that is consistent with iwi participation legislation.</i></p>	
<p>Policy 10: <i>Tier 1, 2, and 3 local authorities:</i></p> <p>(a) <i>that share jurisdiction over urban environments work together when implementing this National Policy Statement; and</i></p> <p>(b) <i>engage with providers of development infrastructure and additional infrastructure to achieve integrated land use and infrastructure planning; and</i></p> <p>(c) <i>engage with the development sector to identify significant opportunities for urban development.</i></p>	<p>Rangiora is located solely within the Waimakariri District so (a) does not apply.</p> <p>The Proposal would enable the provision of medium density housing and supporting infrastructure in an integrated manner as outlined in the evidence of Mr Trist and Mr Collins.</p>
<p>Policy 11: In relation to car parking...</p>	<p>Does not Apply</p>

ATTACHMENT 8: ASSESSMENT OF THE PROPOSAL AGAINST THE CRPS PROVISIONS

CRPS Provision	Assessment
Chapter 5: Land Use and Infrastructure¹²¹	
<p>Objective 5.2.1 Location, Design and Function of Development (Entire Region)</p> <p><i>Development is located and designed so that it functions in a way that:</i></p> <ol style="list-style-type: none"> <i>1. achieves consolidated, well designed and sustainable growth in and around existing urban areas as the primary focus for accommodating the region’s growth; and</i> <i>2. enables people and communities, including future generations, to provide for their social, economic and cultural well-being and health and safety; and which:</i> <ol style="list-style-type: none"> <i>a. maintains, and where appropriate, enhances the overall quality of the natural environment of the Canterbury region, including its coastal environment, outstanding natural features and landscapes, and natural values;</i> <i>b. provides sufficient housing choice to meet the region’s housing needs;</i> <i>c. encourages sustainable economic development by enabling business activities in appropriate locations;</i> <i>d. minimises energy use and/or improves energy efficiency;</i> <i>e. enables rural activities that support the rural environment including primary production;</i> <i>f. is compatible with, and will result in the continued safe, efficient and effective use of regionally significant infrastructure;</i> 	<p>The Site is located less than 2km from the Rangiora Town Centre¹²², with the Proposal supporting the existing identified Key Activity Centre of Rangiora¹²³. As outlined in the WDDS <i>focusing the majority of Rangiora growth to the east better positions Rangiora town centre in the middle of an overall settlement pattern, and provides close proximity for new residential land to existing and proposed community facilities in the east</i>¹²⁴. I consider that the Proposal represents a logical urban expansion to Rangiora.</p> <p>The Proposal seeks to maintain and enhance the overall quality of the natural environment with the provision of open space and esplanade reserve adjacent to the Cam / Ruataniwha River providing opportunities for indigenous riparian planting. Further the provision of green space areas (including the approximate 6.5ha stormwater management reserve) will provide additional opportunities for indigenous planting; contribution to habitats and ecological linkages for indigenous avifauna and invertebrates; and benefits for wetland avifauna¹²⁵.</p> <p>The Proposal also supports sufficient housing choice by enabling the future provision of range of lot sizes¹²⁶</p> <p>The Proposal is compatible with the continued safe, efficient and effective use of regionally significant infrastructure, including the future Rangiora Eastern Link as detailed in Mr Collins evidence.</p>

¹²¹ Within Chapter 5 it is only those issues, objectives and policies notated as ‘Entire Region’ that relate to the Canterbury region inclusive of Greater Christchurch and apply to this rezoning.

¹²² Transport Evidence of Mr Collins, para 63 and 100

¹²³ Economic Evidence of Mr Colegrove, para 89

¹²⁴ WDDS, p.19.

¹²⁵ Ecological Evidence of Dr Tracy-Mines, para 82-83

¹²⁶ Economic Evidence of Mr Colegrove, para 82

<p><i>g. avoids adverse effects on significant natural and physical resources including regionally significant infrastructure, and where avoidance is impracticable, remedies or mitigates those effects on those resources and infrastructure;</i></p> <p><i>h. facilitates the establishment of papakāinga and marae; and</i></p> <p><i>i. avoids conflicts between incompatible activities.</i></p>	
<p>Policy 5.3.7 Strategic land transport network and arterial roads (Entire Region)</p> <p><i>In relation to strategic land transport network and arterial roads, the avoidance of development which:</i></p> <ol style="list-style-type: none"> <i>1. adversely affects the safe efficient and effective functioning of this network and these roads, including the ability of this infrastructure to support freight and passenger transport services; and</i> <i>2. in relation to the strategic land transport network and arterial roads, to avoid development which forecloses the opportunity for the development of this network and these roads to meet future strategic transport requirements.</i> 	<p>The Proposal will avoid development which adversely effects the transport network, with future MRZ development required to be in accordance with the revised SER-ODP, the subdivision and transport provisions of the pWDP (including the appropriate level of assessment for a high trip generating activity) and aligns with the provision of the proposed future Rangiora Eastern Link. Mr Collin’s evidence concludes that the Proposal will not result in any adverse effects on the strategic transport network¹²⁷.</p>
<p>Chapter 6 – Recovery and Rebuilding of Greater Christchurch</p>	
<p>Objective 6.2.1 Recovery Framework</p> <p><i>Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that:</i></p> <ol style="list-style-type: none"> <i>1. identifies priority areas for urban development within Greater Christchurch;</i> <i>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;</i> <i>3. avoids urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS;</i> 	<p>The Site is located less than 2km from the Rangiora Town Centre¹²⁸, with the Proposal supporting the existing identified Key Activity Centre of Rangiora¹²⁹.</p> <p>While the Site is not within an identified ‘Greenfield Priority Area’ of Map A, except for the Additional Land it is located within a FDA, and explicitly provided by Policy 6.3.12 (3).</p> <p>The Site does not contain any outstanding natural features or landscapes and it’s rezoning and future development will not adversely impact any outstanding natural features or landscapes (4).</p> <p>The rezoning will enhance the provision of public space within Eastern Rangiora with approximately 6.5 ha stormwater reserve area being provide for within the Site in accordance with the revised SER-ODP (5).</p>

¹²⁷ Transport Evidence of Mr Collins, para 100

¹²⁸ Transport Evidence of Mr Collins, para 29

¹²⁹ Economic Evidence of Mr Colegrove, para 83

<p>4. <i>protects outstanding natural features and landscapes including those within the Port Hills from inappropriate subdivision, use and development;</i></p> <p>5. <i>protects and enhances indigenous biodiversity and public space;</i></p> <p>6. <i>maintains or improves the quantity and quality of water in groundwater aquifers and surface waterbodies, and quality of ambient air;</i></p> <p>7. <i>maintains the character and amenity of rural areas and settlements;</i></p> <p>8. <i>protects people from unacceptable risk from natural hazards and the effects of sea-level rise;</i></p> <p>9. <i>integrates strategic and other infrastructure and services with land use development;</i></p> <p>10. <i>achieves development that does not adversely affect the efficient operation, use, development, appropriate upgrade, and future planning of strategic infrastructure and freight hubs;</i></p> <p>11. <i>optimises use of existing infrastructure; and</i></p> <p>12. <i>provides for development opportunities on Māori Reserves in Greater Christchurch.</i></p>	<p>The quantity and quality of water in groundwater aquifers and surface waterbodies will be at a minimum maintained, if not enhanced. The stormwater management system comprising a series of wet first flush and attenuation basins and a wetland would result in improved surface water quality¹³⁰. Further opportunities exist to include riparian indigenous planting¹³¹. In addition, on-site springs are to be protected (for example the spring located on the eastern boundary of the Site will be located within the stormwater management area)¹³² (6)</p> <p>The character and amenity of the adjacent eastern rural area will be maintained by appropriate boundary treatment at the residential / rural boundary interface in accordance with the revised SER-ODP and pWDP provisions (7). Mr Milne notes that the inclusion of the Additional Land within the Site and SER-ODP will be mostly bound by a natural landscape feature and that the Cam /Ruataniwha River and associated esplanade and reserve area combined with built form setbacks will be an appropriate boundary interface¹³³</p> <p>The Site is set back approximately 8 km from the coast, with the effects of sea-level rise limited. Natural hazards (flooding and liquefaction risk) can and will be appropriately mitigated as part of future subdivision design and development (8)</p> <p>Future development will not adversely affect the efficient operation, use, development, appropriate upgrade, and future planning of strategic infrastructure (including the Rangiora Eastern Link)¹³⁴ (10) and will optimise the use of existing infrastructure (11) where possible (i.e. water supply will be provided from the existing Council water mains located in Kippenberger Avenue, Devlin Avenue and Northbrook Road ¹³⁵ . In addition, the provision of infrastructure and services will be integrated with the development where possible ((i.e. stormwater management will be integrated to the urban</p>
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¹³⁰ Stormwater Evidence of Mr Delagarza, para 51

¹³¹ Ecological Evidence of Dr Tracy-Mines, para 81-83

¹³² Infrastructure Evidence of Mr Trist, para 50

¹³³ Landscape and Visual Character Evidence of Mr Milne, paras 13-14

¹³⁴ Mr Collin’s evidence concludes that the Proposal will not result in any adverse effects on the strategic transport network, para 100.

¹³⁵ Infrastructure Evidence of Mr Trist, para 39

	development via green links providing additional recreation and amenity benefits (9).												
<p>Objective 6.2.1a Housing Bottom Lines</p> <p><i>For the period 2021-2051, at least sufficient development capacity for housing is enabled for the Greater Christchurch urban environment in accordance with the Housing Bottom Lines set out in Table 6.1.</i></p> <table border="1" data-bbox="181 596 1189 730"> <thead> <tr> <th>Area</th> <th>Medium Term 2021-2031</th> <th>Long Term 2031-2051</th> <th>30 Year Total</th> </tr> </thead> <tbody> <tr> <td>Waimakariri</td> <td>5,100</td> <td>7,400</td> <td>12,500</td> </tr> <tr> <td>Greater Christchurch</td> <td>31,500</td> <td>46,200</td> <td>77,700</td> </tr> </tbody> </table>	Area	Medium Term 2021-2031	Long Term 2031-2051	30 Year Total	Waimakariri	5,100	7,400	12,500	Greater Christchurch	31,500	46,200	77,700	The Economic Evidence has specifically referred to the bottom lines in UFD-01 of the pWDP ¹³⁶ and concludes that the district does not have enough capacity to meet demand, with a lot more needed (which this Proposal would support) ¹³⁷ .
Area	Medium Term 2021-2031	Long Term 2031-2051	30 Year Total										
Waimakariri	5,100	7,400	12,500										
Greater Christchurch	31,500	46,200	77,700										
<p>Objective 6.2.2 Urban Form and Settlement Pattern</p> <p><i>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:</i></p> <p><i>1. aiming to achieve the following targets for intensification as a proportion of overall growth through the period of recovery:</i></p> <p><i>a. 35% averaged over the period between 2013 and 2016</i></p> <p><i>b. 45% averaged over the period between 2016 to 2021</i></p> <p><i>c. 55% averaged over the period between 2022 and 2028;</i></p> <p><i>2. 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;</i></p>	<p>MRZ will enable higher density living environments to be established (2) and provision will be made for a greater range of lot sizes than previously experienced by Rangiora providing for a greater range of housing typology as outlined in the evidence by Mr Colegrave. For example, the current average lot size for Rangiora is approximately 810m², whilst the Proposal is anticipated to result in an average lot size closer to 450m²¹³⁸. Development is considered sustainable and self-sufficient growth of Rangiora.</p> <p>Except for the Additional Land, urban development of the Site is in accordance with the urban growth strategy for Greater Christchurch (5) shown in Map A of the CRPS and the GCSP.</p>												

¹³⁶ Economic Evidence of Mr Colegrave, para 113 (Table 8)

¹³⁷ Economic Evidence of Mr Colegrave, para 72-74

¹³⁸ Economic Evidence of Mr Colegrave, paras 81-82

<p>3. reinforcing the role of the Christchurch central business district within the Greater Christchurch area as identified in the Christchurch Central Recovery Plan;</p> <p>4. providing for the development of greenfield priority areas, and of land within Future Development Areas where the circumstances set out in Policy 6.3.12 are met, on the periphery of Christchurch’s urban area, and surrounding towns at a rate and in locations that meet anticipated demand and enables the efficient provision and use of network infrastructure;</p> <p>5. encouraging sustainable and self-sufficient growth of the towns of Rangiora, Kaiapoi, Woodend, Lincoln, Rolleston and Prebbleton and consolidation of the existing settlement of West Melton;</p> <p>6. Managing rural residential development outside of existing urban and priority areas; and</p> <p>7. Providing for development opportunities on Māori Reserves.</p>	
<p>Objective 6.2.3 Sustainability</p> <p>Sustainability Recovery and rebuilding is undertaken in Greater Christchurch that:</p> <ol style="list-style-type: none"> 1. provides for quality living environments incorporating good urban design; 2. retains identified areas of special amenity and historic heritage value; 3. retains values of importance to Tāngata Whenua; 4. provides a range of densities and uses; and 5. is healthy, environmentally sustainable, functionally efficient, and prosperous. 	<p>The Proposal would enable the provision of a quality living environment through the incorporation of good urban design, the detail of which will be assessed through the subdivision and land use consent stage. In addition, it would provide for a range of residential densities (4).</p>
<p>Objective 6.2.4 Integration of transport infrastructure and land use</p> <p>Prioritise the planning of transport infrastructure so that it maximises integration with the priority areas and new settlement patterns and facilitates the movement of people and goods and provision of services in Greater Christchurch, while:</p> <ol style="list-style-type: none"> 1. managing network congestion; 	<p>The Site (except for the Additional Land) is within a FDA ensuring that strategic planning is already underway to best maximise integration of transport infrastructure and land use. The revised SER-ODP will provide for well-connected vehicle movement¹³⁹ along with a well-integrated network of pedestrian and shared paths¹⁴⁰ to ensure it is well serviced by alternative transport modes and links to public transport services¹⁴¹.</p>

¹³⁹ Transport Evidence of Mr Collins, para 75

¹⁴⁰ Transport Evidence of Mr Collins, para 79

¹⁴¹ Transport Evidence of Mr Collins, para 83

<ul style="list-style-type: none"> 2. <i>reducing dependency on private motor vehicles;</i> 3. <i>reducing emission of contaminants to air and energy use;</i> 4. <i>promoting the use of active and public transport modes;</i> 5. <i>optimising use of existing capacity within the network; and</i> 6. <i>enhancing transport safety.</i> 	
<p>Policy 6.3.1 Development within the Greater Christchurch area</p> <p><i>In relation to recovery and rebuilding for Greater Christchurch:</i></p> <ul style="list-style-type: none"> 1. <i>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;</i> 2. <i>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;</i> 3. <i>enable development of existing urban areas and greenfield priority areas, including intensification in appropriate locations, where it supports the recovery of Greater Christchurch;</i> 4. <i>ensure new urban activities only occur within existing urban areas or identified greenfield priority areas as shown on Map A, unless they are otherwise expressly provided for in the CRPS;</i> 5. <i>provide for educational facilities in rural areas in limited circumstances where no other practicable options exist within an urban area;</i> 6. <i>provide for commercial film or video production activities in appropriate commercial, industrial and rural zones within the Christchurch District;</i> 7. <i>provide for a metropolitan recreation facility at 466-482 Yaldhurst Road; and</i> 8. <i>avoid development that adversely affects the function and viability of, or public investment in, the Central City and Key Activity Centres.</i> 	<p>While the Site is not within an identified 'Greenfield Priority Area' of Map A it is located within a within a FDA (except for the Additional Land), with development of these areas specifically provided for by Policy 6.3.12 of the CRPS.</p> <p>Whilst the Additional Land is not provided for it adjoins the future Rangiora urban environment identified and provided for. In addition, it is within the Greater Christchurch area which corresponds to the Christchurch tier 1 urban environment as defined by the NPS UD.</p>

<p>Policy 6.3.2 Development form and urban design</p> <p><i>Business development, residential development (including rural residential development) and the establishment of public space is to give effect to the principles of good urban design below, and those of the NZ Urban Design Protocol 2005, to the extent appropriate to the context:</i></p> <ol style="list-style-type: none"> <i>1. Tūrangawaewae – the sense of place and belonging – recognition and incorporation of the identity of the place, the context and the core elements that comprise the Through context and site analysis, the following elements should be used to reflect the appropriateness of the development to its location: landmarks and features, historic heritage, the character and quality of the existing built and natural environment, historic and cultural markers and local stories.</i> <i>2. Integration – recognition of the need for well-integrated places, infrastructure, movement routes and networks, spaces, land uses and the natural and built environment. These elements should be overlaid to provide an appropriate form and pattern of use and development.</i> <i>3. Connectivity – the provision of efficient and safe high quality, barrier free, multimodal connections within a development, to surrounding areas, and to local facilities and services, with emphasis at a local level placed on walking, cycling and public transport as more sustainable forms of</i> <i>4. Safety – recognition and incorporation of Crime Prevention Through Environmental Design (CPTED) principles in the layout and design of developments, networks and spaces to ensure safe, comfortable and attractive places.</i> <i>5. Choice and diversity – ensuring developments provide choice and diversity in their layout, built form, land use housing type and density, to adapt to the changing needs and circumstances of the population.</i> <i>6. Environmentally sustainable design – ensuring that the process of design and development minimises water and resource use, restores ecosystems, safeguards mauri and maximises passive solar gain.</i> <i>7. Creativity and innovation – supporting opportunities for exemplar approaches to infrastructure and urban form to lift the benchmark in the development of new urban areas in the Christchurch region.</i> 	<p>Whilst specific urban design evidence has not been prepared for the Proposal, I note that the revised SER-ODP retains and enhances many of the key features of the notified SER-ODP which I understand was developed following extensive input and consultation¹⁴².</p> <p>The revised SER-ODP provides:</p> <ol style="list-style-type: none"> a) enhanced connectivity (specifically walking and cycling) to the Cam / Ruataniwha River ¹⁴³ and open space and stormwater reserve spaces¹⁴⁴; b) a blue green/ open space reserve network that provides the opportunity to improve physical values through habitat creation, associative values through site identity and site narratives, and perceptual values through site experience¹⁴⁵ c) a more centrally located open space reserve¹⁴⁶; d) appropriate connectivity within the Site and to the Additional Land¹⁴⁷ e) greater opportunities for indigenous plantings which would benefit the ecological values of the Site¹⁴⁸. <p>On this basis, I consider that RMZ-enabled development of the Site will give effect to the principles of good urban design and be appropriate for the context of the existing and future higher density urban form of South East Rangiora.</p>
<p>Policy 6.3.3 Development in accordance with outline development plans</p> <p><i>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.</i></p>	<p>The revised SER-ODP will guide future development of the Site, has been prepared to integrate with existing development in Rangiora and future urban development of the SER-DA. It satisfies the relevant requirements of this policy.</p>

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:

 - 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;**

¹⁴² As outlined in the s32 Report of the pWDP for the Development Areas, p.9.

¹⁴³ Landscape and Visual Character Evidence of Mr Milne, para 119

¹⁴⁴ Landscape and Visual Character Evidence of Mr Milne, para 70

¹⁴⁵ Landscape and Visual Character Evidence of Mr Milne, para 73

¹⁴⁶ Landscape and Visual Character Evidence of Mr Milne, para 121

¹⁴⁷ Transport Evidence of Mr Collins, para 68

¹⁴⁸ Ecological Evidence of Dr Tracy-Mines, para 83

<p><i>h. Land reserved or otherwise set aside from development for any other reason, and the reasons for its protection from development;</i></p> <p><i>i. Pedestrian walkways, cycleways and public transport routes both within and adjoining the area to be developed;</i></p> <p><i>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;</i></p> <p><i>5. Identify significant cultural, natural or historic heritage features and values, and show how they are to be protected and/or enhanced;</i></p> <p><i>6. Document the infrastructure required, when it will be required and how it will be funded;</i></p> <p><i>7. Set out the staging and co-ordination of subdivision and development between landowners;</i></p> <p><i>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;</i></p> <p><i>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;</i></p> <p><i>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;</i></p> <p><i>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</i></p> <p><i>12. Include any other information that is relevant to an understanding of the development and its proposed zoning.</i></p>	
<p>Policy 6.3.4 Transport effectiveness</p> <p><i>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:</i></p>	<p>Mr Collins’ concludes that the trip generation anticipated from MRZ development of the Site in accordance with the revised SER-ODP is appropriate for the wider transport network and can be accommodated with the establishment of the Rangiora Eastern Link, ultimately noting that the Proposal can be supported from a traffic and transportation perspective¹⁴⁹.</p>

¹⁴⁹ Transport Evidence of Mr Collins, para 100

<ol style="list-style-type: none"> 1. <i>avoiding development that will overload strategic freight routes;</i> 2. <i>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;</i> 3. <i>providing opportunities for travel demand management;</i> 4. <i>requiring integrated transport assessment for substantial developments; and</i> 5. <i>improving road user safety.</i> 	
<p>Policy 6.3.5 Integration of land use and infrastructure</p> <p><i>Recovery of Greater Christchurch is to be assisted by the integration of land use development with infrastructure by:</i></p> <ol style="list-style-type: none"> 1. <i>Identifying priority areas for development and Future Development Areas to enable reliable forward planning for infrastructure development and delivery;</i> 2. <i>Ensuring that the nature, timing and sequencing of new development are co-ordinated with the development, funding, implementation and operation of transport and other infrastructure in order to:</i> <ol style="list-style-type: none"> a. <i>optimise the efficient and affordable provision of both the development and the infrastructure;</i> b. <i>maintain or enhance the operational effectiveness, viability and safety of existing and planned infrastructure;</i> c. <i>protect investment in existing and planned infrastructure;</i> d. <i>ensure that new commercial film or video production facilities are connected to reticulated water and wastewater systems; and</i> e. <i>ensure new development does not occur until provision for appropriate infrastructure is in place;</i> 3. <i>Providing that the efficient and effective functioning of infrastructure, including transport corridors, is maintained, and the ability to maintain and upgrade that infrastructure is retained;</i> 4. <i>Only providing for new development that does not affect the efficient operation, use, development, appropriate upgrading and safety of existing strategic infrastructure, including by avoiding noise</i> 	<p>Appropriate infrastructure will be provided for the Site that integrates with the land use in accordance with Policy 6.3.5 and this has been developed in discussion with WDC and the IAF agreement.</p>

<p><i>sensitive activities within the 50dBA Ldn airport noise contour for Christchurch International Airport... ; and</i></p> <p><i>5. Managing the effects of land use activities on infrastructure, including avoiding activities that have the potential to limit the efficient and effective, provision, operation, maintenance or upgrade of strategic infrastructure and freight hubs.</i></p>	
<p>Policy 6.3.7 Residential location, yield and intensification</p> <p><i>In relation to residential development opportunities in Greater Christchurch:</i></p> <ol style="list-style-type: none"> <i>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.</i> <i>2. Intensification in urban areas of Greater Christchurch is to be focused around the Central City, Key Activity Centres and neighbourhood centres commensurate with their scale and function, core public transport routes, mixed-use areas, and on suitable brownfield land.</i> <i>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):</i> <ol style="list-style-type: none"> <i>a. 10 household units per hectare in greenfield areas in Selwyn and Waimakariri District;</i> <i>b. 15 household units per hectare in greenfield areas in Christchurch City;</i> <i>4. Intensification development within Christchurch City to achieve an average of: a. 50 household units per hectare for intensification development within the Central City; b. 30 household units per hectare for intensification development elsewhere.</i> <i>5. Provision will be made in district plans for comprehensive development across multiple or amalgamated sites.</i> <i>6. Housing affordability is to be addressed by providing sufficient intensification and greenfield land to meet housing demand, 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.</i> 	<p>The concept lot layout prepared for the Site demonstrates that MRZ development in accordance with the SER-ODP can achieve a residential net density exceeding 10 household units per hectare (and more likely will exceed 15).</p>

<p>Policy 6.3.12 Future Development Areas</p> <p><i>Enable urban development in the Future Development Areas identified on Map A, in the following circumstances:</i></p> <ol style="list-style-type: none"> <i>1. It is demonstrated, through monitoring of housing and business development capacity and sufficiency carried out collaboratively by the Greater Christchurch Partnership or relevant local authorities, that there is a need to provide further feasible development capacity through the zoning of additional land in a district plan to address a shortfall in the sufficiency of feasible residential development capacity to meet the medium term housing bottom lines set out in Table 6.1, Objective 6.2.1a; and</i> <i>2. The development would promote the efficient use of urban land and support the pattern of settlement and principles for future urban growth set out in Objectives 6.2.1 and 6.2.2 and related policies including by:</i> <ol style="list-style-type: none"> <i>a. Providing opportunities for higher density living environments, including appropriate mixed use development, and housing choices that meet the needs of people and communities for a range of dwelling types; and</i> <i>b. Enabling the efficient provision and use of network infrastructure; and</i> <i>3. The timing and sequencing of development is appropriately aligned with the provision and protection of infrastructure, in accordance with Objective 6.2.4 and Policies 6.3.4 and 6.3.5; and</i> <i>4. The development would occur in accordance with an outline development plan and the requirements of Policy 6.3.3; and</i> <i>5. The circumstances set out in Policy 6.3.11(5) are met; and</i> <i>6. The effects of natural hazards are avoided or appropriately mitigated in accordance with the objectives and policies set out in Chapter 11.</i> 	<p>Whilst Map A does not identify the area of Additional Land for future urban development (Policy 6.3.12 does not apply), a more detailed planning analysis is provided in relation to this land in paras 168-219.</p> <p>The economic evidence outlines that the district faces a significant, widespread shortage of feasible capacity to meet demand, with a lot more needed which the Proposal responds to (1)¹⁵⁰.</p> <p>The Proposal is in accordance with Objectives 6.2.1 and 6.2.2 and the related policies as outlined above (2).</p> <p>The timing of the rezoning is appropriately aligned and sequenced with the development of planned upgrades to existing or establishment of new infrastructure (3) and will occur in general accordance with an ODP (the revised SER-ODP) developed in accordance with the requirements of Policy 6.3.3.</p> <p>The rezoning is considered in accordance with all the circumstances listed in Policy 6.3.11 (5). Whilst the Rangiora Eastern Link is not yet operational, as outlined in the evidence of Mr Collins future development of the Site can be staged appropriately in accordance with the establishment of the Rangiora Eastern Link giving effect to 6.3.11(5)(a).</p> <p>The effects of natural hazards are avoided or appropriately mitigated (6) as per the assessment provided below regarding the requirements of Chapter 11.</p>
<p>Chapter 7 - Freshwater</p>	
<p>Objective 7.2.3 Protection of intrinsic value of waterbodies and their riparian zones</p> <p><i>The overall quality of freshwater in the region is maintained or improved, and the life supporting capacity, ecosystem processes and indigenous species and their associated fresh water ecosystems are safeguarded.</i></p> <p>Policy 7.3.1 Adverse effects of activities on the natural character of fresh water</p>	<p>The Proposal specifically recognises the presence of the Cam/ Ruataniwha River being a natural feature on the Site with green space and esplanade reserve provided along the Site’s boundary with this river. Dr Tracy-Mines notes that this provides opportunities for indigenous riparian planting which would benefit ecological values¹⁵¹. In addition, on-site springs will be appropriately safeguarded and preserved. The spring on the eastern boundary is proposed to</p>

<p><i>To identify the natural character values of fresh water bodies and their margins in the region and to:</i></p> <ol style="list-style-type: none"> <i>1. preserve natural character values where there is a high state of natural character;</i> <i>2. maintain natural character values where they are modified but highly valued; and</i> <i>3. improve natural character values where they have been degraded to unacceptable levels; unless modification of the natural character values of a fresh water body is provided for as part of an integrated solution to water management in a catchment in accordance with Policy 7.3.9, which addresses remedying and mitigating adverse effects on the environment and its natural character values.</i> 	<p>be incorporated within the SMA. As outlined in the ecological evidence the revised SER-ODP will result in at least no net loss of biodiversity, and most likely an indigenous biodiversity gain¹⁵².</p> <p>The resource consent process will ensure further ecological assessment and engineering design is cognisant of natural character and fresh water values, in accordance with relevant legislation / statutory documents.</p>
<p>Policy 7.3.3 Enhancing fresh water environments and biodiversity</p> <p><i>To promote, and where appropriate require the protection, restoration and improvement of lakes, rivers, wetlands and their riparian zones and associated Ngāi Tahu values, and to:</i></p> <ol style="list-style-type: none"> <i>1. identify and protect areas of significant indigenous vegetation and significant habitats, sites of significant cultural value, wetlands, lakes and lagoons/Hapūa, and other outstanding water bodies; and</i> <i>2. require the maintenance and promote the enhancement of indigenous biodiversity, inland basin ecosystems and riparian zones; and</i> <i>3. promote, facilitate or undertake pest control.</i> 	
<p>Policy 7.3.4 Water quantity</p> <p><i>In relation to the management of water quantity:</i></p> <ol style="list-style-type: none"> <i>1. to manage the abstraction of surface water and groundwater by establishing environmental flow regimes and water allocation regimes which:</i> <ol style="list-style-type: none"> <i>a. manage the hydrological connections of surface water, groundwater and the coastal environment;</i> <i>b. avoid long-term decline in groundwater levels and saltwater intrusion of coastal groundwater resources;</i> <i>c. protect the flows, freshes and flow variability required to safeguard the life-supporting capacity, mauri, ecosystem processes and indigenous species including their associated ecosystems and protect the natural character values of fresh water bodies in the catchment, including any flows required to transport sediment, to open the river mouth, or to flush coastal lagoons;</i> 	

¹⁵⁰ Economic Evidence of Mr Colegrave, para 72-74

¹⁵¹ Ecological Evidence of Dr Tracy-Mines, para 81

¹⁵² Ecological Evidence of Dr Tracy-Mines, para 105

<p>d. provide for any existing or reasonably foreseeable needs of surface water or groundwater for individual, marae or community drinking water or stockwater supplies;</p> <p>e. support the exercise of customary uses, including any flows required to maintain wetlands or water quality for customary uses; and</p> <p>f. support any flow requirements needed to maintain water quality in the catchment; and, having satisfied the requirements in (a) to (f), provide for:</p> <p>g. recreational values (including the patterns and timing of flow variability desired by recreational users) and amenity values; and</p> <p>h. any actual or reasonably foreseeable demand for abstraction (for uses other than those listed in (d) above), unless Policy 7.3.4(2) applies;</p> <p>and</p> <p>2. Where the quantum of water allocated for abstraction from a water body is at or exceeds the maximum amount provided for in an environmental flow and water allocation regime:</p> <p>a. avoid any additional allocation of water for abstraction or any other action which would result in further over-allocation; and</p> <p>b. set a timeframe for identifying and undertaking actions to effectively phase out over-allocation; and</p> <p>c. effectively addresses any adverse effects of over-allocation in the interim.</p>	
<p>Policy 7.3.5 Water quantity and land uses</p> <p>To avoid, remedy or mitigate adverse effects of land uses on the flow of water in surface water bodies or the recharge of groundwater by:</p> <p>1. controlling the diversion of rainfall run-off over land, and changes in land uses, site coverage or land drainage patterns that will, either singularly or cumulatively, adversely affect the quantity or rate of water flowing into surface water bodies or the rate of groundwater recharge; and</p> <p>2. managing the planting or spread of exotic vegetation species in catchments where, either singularly or cumulatively, those species are or are likely to have significant adverse effects on flows in surface water bodies.</p>	
<p>Chapter 9- Ecosystems and Indigenous Biodiversity</p>	
<p>Objective 9.2.1 Halting the decline of Canterbury’s ecosystems and indigenous biodiversity</p> <p><i>The decline in the quality and quantity of Canterbury’s ecosystems and indigenous biodiversity is halted and their life-supporting capacity and mauri safeguarded.</i></p>	<p>The Proposal recognises the presence of the Cam/Ruataniwha River on the Site’s eastern boundary, with the revised SER-ODP providing green space along the riparian margin providing opportunities for indigenous plantings which would benefit the ecological values of the Site¹⁵³.</p>

¹⁵³ Ecological evidence of Dr Tracy-Mines, para 81

	<p>The ecological evidence concludes that MRZ zoning of the Site and future development in accordance with the revised SER-ODP, would likely result in at least no net loss of biodiversity, and most likely, a net gain for indigenous biodiversity¹⁵⁴.</p> <p>The resource consent process will ensure further ecological assessment and engineering design is cognisant of natural character and fresh water values, in accordance with relevant legislation / statutory documents.</p>
<p>Chapter 11 – Natural Hazards</p>	
<p>Objective 11.2.1 Avoid new subdivision, use and development of land that increases risks associated with natural hazards <i>New subdivision, use and development of land which increases the risk of natural hazards to people, property and infrastructure is avoided or, where avoidance is not possible, mitigation measures minimise such risks.</i></p>	<p>Potential flooding and overland flows will be appropriately managed and mitigated through engineering design and assessment undertaken at the subdivision consent stage such that the risk of natural hazards to people, property and infrastructure is not increased. Mr Delagarza concludes that there are multiple technical solutions for ensuring overflow from the Cam/Ruataniwha River does not adversely impact future residential development or surrounding properties¹⁵⁵.</p> <p>Similarly, the geotechnical evidence outlines that there are a range of mitigation measures and solutions (including the use of surcharge and preloading prior to development, the use of suitable foundation design; and the use of geogrid reinforced soil fills to protect underground services) which are considered standard industry solutions which can be readily implemented to address the geotechnical hazards identified¹⁵⁶.</p>
<p>Objective 11.2.2 Adverse effects from hazard mitigation are avoided or mitigated <i>Adverse effects on people, property, infrastructure and the environment resulting from methods used to manage natural hazards are avoided or, where avoidance is not possible, mitigated.</i></p>	
<p>Objective 11.2.3 Climate change and natural hazards <i>The effects of climate change, and its influence on sea levels and the frequency and severity of natural hazards, are recognised and provided for.</i></p>	<p>Future subdivision design and development will be designed in accordance with the WDC Engineering Code of Practice (Issue 4, 16 September 2019) which requires that the 'estimation of the peak flow rate and volumes shall be in accordance with the CCC Waterways Wetlands and Drainage Guide (WWDG) Part B chapters 21, 22'. The WWDG requires the use of rainfall intensities for the 2% AEP Event and includes climate change allowance (HIRDS V4 Scenario RCP 8.5 (2081-2100)). The climate change considerations of the HIRDS includes the impact of future climate change on extreme rainfall using regional</p>

¹⁵⁴ Ecological evidence of Dr Tracy-Mines, para 105

¹⁵⁵ Stormwater Evidence of Mr Delagarza, para 65

¹⁵⁶ Geotechnical Evidence of Mr Kupec, para 25.

	<p>climate model simulations of rainfall over New Zealand and provides adjustments for climate change due to temperature change.</p>
<p>Policy 11.3.1 Avoidance of inappropriate development in high hazard areas</p> <p><i>To avoid new subdivision, use and development (except as provided for in Policy 11.3.4) of land in high hazard areas, unless the subdivision, use or development:</i></p> <ol style="list-style-type: none"> <i>1. is not likely to result in loss of life or serious injuries in the event of a natural hazard occurrence; and</i> <i>2. is not likely to suffer significant damage or loss in the event of a natural hazard occurrence; and</i> <i>3. is not likely to require new or upgraded hazard mitigation works to mitigate or avoid the natural hazard; and</i> <i>4. is not likely to exacerbate the effects of the natural hazard; or</i> <i>5. Outside of greater Christchurch, is proposed to be located in an area zoned or identified in a district plan for urban residential, industrial or commercial use, at the date of notification of the CRPS, in which case the effects of the natural hazard must be mitigated; or</i> <i>6. Within greater Christchurch, is proposed to be located in an area zoned in a district plan for urban residential, industrial or commercial use, or identified as a "Greenfield Priority Area" on Map A of Chapter 6, both at the date the Land Use Recovery Plan was notified in the Gazette, in which the effect of the natural hazard must be avoided or appropriately mitigated; or</i> <i>7. Within greater Christchurch, relates to the maintenance and/or upgrading of existing critical or significance infrastructure.</i> 	<p>The Site is not located in a high hazard area¹⁵⁷, so Policy 11.3.1 does not apply.</p>
<p>11.3.2 Avoid development in areas subject to inundation</p> <p><i>In areas not subject to Policy 11.3.1 that are subject to inundation by a 0.5% AEP flood event; any new subdivision, use and development (excluding critical infrastructure) shall be avoided unless there is no increased risk to life, and the subdivision, use or development:</i></p> <ol style="list-style-type: none"> <i>1. is of a type that is not likely to suffer material damage in an inundation event; or</i> <i>2. is ancillary or incidental to the main development; or</i> 	<p>Future development can be designed in accordance with the applicable District Plan and Building Code requirements to ensure that flooding is managed appropriately. Storage can be provided by stormwater basins to attenuate post development peak flows and run-off volumes to below predevelopment. In addition, the rezoning will mitigate and manage the potential for earthworks and filling to adversely affect other sites.</p>

¹⁵⁷ Stormwater Evidence of Mr Delagarza, para 63

<p>3. meets all of the following criteria:</p> <p>a. new buildings have an appropriate floor level above the 0.5% AEP design flood level; and</p> <p>b. hazardous substances will not be inundated during a 0.5% AEP flood event; provided that a higher standard of management of inundation hazard events may be adopted where local catchment conditions warrant (as determined by a cost/benefit assessment).</p> <p>When determining areas subject to inundation, climate change projections including sea level rise are to be taken into account.</p>	
<p>Policy 11.3.3 Earthquake hazards</p> <p>New subdivision, use and development of land on or close to an active earthquake fault trace, or in areas susceptible to liquefaction and lateral spreading, shall be managed in order to avoid or mitigate the adverse effects of fault rupture, liquefaction and lateral spreading.</p>	<p>From a geotechnical and liquefaction hazard perspective, geotechnical hazards can be appropriately managed provided that the recommended geotechnical measures (preload design, foundations, and infrastructure design) are implemented to give effect to Policy 11.3.3</p>
<p>Policy 11.3.4 Critical infrastructure</p> <p>New critical infrastructure will be located outside high hazard areas unless there is no reasonable alternative. In relation to all areas, critical infrastructure must be designed to maintain, as far as practicable, its integrity and function during natural hazard events.</p>	<p>Critical Infrastructure is defined in the CRPS as including supply and treatment of water for public supply, stormwater and sewerage disposal systems, and strategic road networks. New critical infrastructure to service future urban development on the site will be designed to maintain, as far as practicable, its integrity and function during natural hazard events in accordance with this Policy.</p>
<p>Policy 11.3.5 General risk management approach</p> <p>For natural hazards and/or areas not addressed by policies 11.3.1, 11.3.2, and 11.3.3, subdivision, use or development of land shall be avoided if the risk from natural hazards is unacceptable. When determining whether risk is unacceptable, the following matters will be considered:</p> <ol style="list-style-type: none"> 1. the likelihood of the natural hazard event; and 2. the potential consequence of the natural hazard event for: people and communities, property and infrastructure and the environment, and the emergency response organisations. <p>Where there is uncertainty in the likelihood or consequences of a natural hazard event, the local authority shall adopt a precautionary approach.</p> <p>Formal risk management techniques should be used, such as the Risk Management Standard (AS/NZS ISO 31000:2009) or the Structural Design Action Standard (AS/NZS 1170.0:2002).</p>	<p>There are no other natural hazard risks considered of relevance for consideration to this rezoning under Policy 11.3.5 that are not already addressed by policies 11.3.1, 11.3.2, and 11.3.3 (flooding and earthquakes).</p>

Policy 11.3.8 Climate change

When considering natural hazards, and in determining if new subdivision, use or development is appropriate and sustainable in relation to the potential risks from natural hazard events, local authorities shall have particular regard to the effects of climate change

Future subdivision design and development will be designed in accordance with the WDC Engineering Code of Practice which requires that the 'estimation of the peak flow rate and volumes shall be in accordance with the CCC Waterways Wetlands and Drainage Guide (WWDG) Part B chapters 21, 22'. The WWDG requires the use of rainfall intensities for the 2% AEP Event and includes climate change allowance (HIRDS V4 Scenario RCP 8.5 (2081-2100)). The climate change considerations of the HIRDS includes the impact of future climate change on extreme rainfall using regional climate model simulations of rainfall over New Zealand and provides adjustments for climate change due to temperature change.

ATTACHMENT 9: THE KEY RMA FRAMEWORK FOR PREPARING OR CHANGING DISTRICT PLANS

Sections 31 – 32 and 72 – 76 of the RMA provide the core framework for preparing or changing district plans with the key framework being:

- (a) the functions of Council are set out in section 31 and include the establishment, implementation and review of objectives, policies and methods to:

achieve integrated management of the effects of the use, development and protection of land and associated natural and physical resources¹⁵⁸;

ensure that there is sufficient development capacity in respect of housing and business land to meet the expected demands of the district¹⁵⁹; and

control any actual or potential effects of the use, development or protection of land¹⁶⁰;

- (b) section 74 (1) sets out the matters the Council must prepare and change its district plan in accordance with (and those of relevant to this rezoning are listed below):

its functions under section 31;

the provisions of Part 2;

having regard to an evaluation report prepared in accordance with section 32; and

a national policy statement, a New Zealand coastal policy statement, and a national planning standard.

- (c) section 74(2) sets out the matters the Council must have regard to which includes management plans and strategies prepared under other Acts¹⁶¹ (i.e.,

¹⁵⁸ RMA, s31(1)(a)

¹⁵⁹ RMA, s31(1)(aa)

¹⁶⁰ RMA, s31(1)(b)

¹⁶¹ RMA, s32(2)(b)(i)

the GCSP) and consistency with the plans or proposed plans of adjacent territorial authorities¹⁶²; and

- (d) section 74(2A) sets out that Council must take into account any relevant planning document recognised by an iwi authority;
- (e) section 75 (3) sets out that a district plan must give effect to any national policy statement; New Zealand coastal policy statement; national planning standard; and regional policy statement;
- (f) section 75 (4) sets out that a district plan must also not be inconsistent with a regional plan; and
- (g) section 76 (3) requires council to have regard to actual and potential effects on the environment, including, in particular, any adverse effect in respect to making a rule.

¹⁶² RMA, s32 (c)