

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

UNDER the Resource Management Act 1991 (RMA)

IN THE MATTER of a submission under clause 6 of the First Schedule of the RMA by Alistair John Dugald Cameron in relation to the proposed zoning of an eight hectare lot located on the eastern side of the Ashley township and being Lot 1 DP 394101 RT 376526.

STATEMENT OF EVIDENCE OF PETER LLOYD GLASSON

04 MARCH 2024

Introduction, Qualifications and Experience

- 1 My name is Peter Lloyd Glasson.
- 2 I hold degrees of BSc (Botany), Bachelor of Town Planning (including Environmental Planning), and Master of Environmental Science with Honours all from the University of Auckland.
- 3 I am a Resource Management and Environmental Planner at Davis Ogilvie and Partners Limited. I have approximately 34 years' experience in planning and professional resource management planning related work. Prior to joining Davis Ogilvie and Partners Limited I was a Planner at two local authorities for a total of three years and then various consultancies; including being a Director of both Glasson Potts Fowler Limited for eleven years, and a Director of Glasson Resource Management Limited for ten years.
- 4 Although this evidence is prepared for a Council hearing, I have read the code of conduct for expert witnesses contained within the Environment Court Practice Note 2023 and agree to comply with it. Other than where I state that I am relying on the evidence of another person, I confirm that the issues addressed in my statement of evidence are within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinion that I outline in this statement.
- 5 I have been involved in numerous planning projects involving the rezoning of land and residential land development.

Scope of my Evidence

- 6 I have been asked by Mr Alistair John Dugald Cameron ("**the Submitter**") to provide independent expert evidence on his submission (Submission No. 180 in the Proposed Waimakariri District Plan Summary of Submissions) (**Proposed District Plan**: see **Appendix 1**) requesting the rezoning of his approximately eight hectare property (7.9937 ha) ("**the Property**") located at 2 Auckland Street, Ashley township, from Rural Lifestyle Zone ("RLZ") to Settlement Zone ("SETZ") and I refer throughout my evidence to the relief sought in the Submitter's submission as "**the Rezoning**".
- 7 The land is legally described as Lot 1 DP 394101 and contained in Record of Title 376526 (**Appendix 2**).

- 8 A plan showing the general locality of the area is appended (**Appendix 3**) and the Property (**Appendix 4**).
- 9 In preparing my Statement of Evidence, I have reviewed the following material and documents:
- a) Submission by Alistair Cameron
 - b) Previous draft scheme of subdivisions for the Property
 - c) Report of Mr Clem Maloney (engineering services)
 - d) Report of Mr Ian Lloyd (flood hazard)
 - e) Report of Mr Gareth Oddy (PSI: Preliminary Site Investigation)
 - f) Report of Mr Elliot Duke (Geotechnical Suitability)
 - g) Canterbury Regional Policy Statement (“CRPS”)
 - h) National Policy Statement on Highly Productive Land 2022 (“NPS-HPL”)
 - i) National Policy Statement on Urban Development 2020 (“NPS-UD”)
 - j) Our Space 2018-2048 – Greater Christchurch 2050
 - k) Waimakariri Rural Residential Development Strategy 2019
 - l) District Development Strategy: Our District, Our Future – Waimakariri 2048
 - m) Plan Change 31: Application, Evidence, Decision
 - n) the Operative District Plan (“ODP”)
 - o) the Proposed District Plan (“PDP”)
- 10 I have prepared my Statement of Evidence on the basis that it will assist the preparation of the Council’s section 42A Report. At a later date I intend to prepare an addendum to this Statement of Evidence to comment on any matters raised in the Section 42A report that I have not covered in this Statement.

Evidence Outline

- 11 My evidence addresses the following matters:

- a) the Existing Environment (Description of the site; Description of the Locality; Previous Development Scenarios; Prior Draft Scheme Plans of Subdivision; Resource Consent Applications)
- b) the Proposed Rezoning & Site Suitability
- c) the Planning Framework
 - (i) Relevant National Policy Statements
 - (ii) Canterbury Regional Policy Statement
 - (iii) Background Waimakariri reports
 - (iv) Operative District Plan
 - (v) Proposed Waimakariri District Plan
 - (vi) Other relevant documents
- d) Overall Conclusion

Executive Summary

- 12 The relief sought in Submission 180 by Mr Alastair Cameron seeks to rezone an eight hectare parcel of land directly abutting the eastern side of Ashley township from (Proposed) Rural Lifestyle Zone (“RLZ”) to Settlement Zone (“SETZ”) in the Proposed District Plan.
- 13 The RLZ would allow the subdivision of the Property into two lots. The rezoning to SETZ would allow the subdivision of the Property into approximately 90 lots. Mr Cameron’s preference is a SETZ zoning with a specific property notation restricting this site to an 800 m² minimum lot size, which would enable approximately 70 lots.
- 14 The existing Ashley township is essentially developed with very limited *practical* availability for expansion pursuant to the zoning proposed under the Proposed District Plan.
- 15 The technical servicing evidence (**Appendix 5**) appended to my evidence provides the certainty that the Property zoned SETZ can be serviced for potable water supply, on site stormwater treatment and management, sewage disposal, power, and telephone.

- 16 The report of Mr Lloyd (**Appendix 6**) confirms that the Property is not subject to flooding and the stopbanks alongside the Ashley River provide sufficient protection in the 1:500 AEP event.
- 17 Further considerable on site investigations have been undertaken. In-depth geotechnical investigations of the site were undertaken in September 2020. The geotechnical report (**Appendix 7**) by Mr Elliot Duke concluded that the site is considered suitable for residential development.
- 18 A PSI (Preliminary Site Investigation) (**Appendix 8**) has been completed and concluded that the Property can be used for residential purposes without risk to human health.
- 19 The proposed SETZ of the Property will enable the logical expansion of the Ashley township. The proposed rezoning will allow an urban form on the Property that directly abuts the existing township and is of a similar form and intensity, and further consolidates the existing township.
- 20 Although, part of the “wider” Rangiora township, the Ashley township provides an *alternative* environment for residential expansion to the Rangiora township.
- 21 The NPS-HPL is not applicable to the site. However, even if it were, I do not consider that the loss of eight hectares of Class 3 soils should outweigh the benefits of providing additional residential land for development in this locality, and within Waimakariri District.
- 22 In my view, the NPS-UD does need to be considered. The Rezoning will allow residential expansion and growth in a consolidated urban form and density and provide a residential product at an affordable price point compared to other housing formats elsewhere within the District.

Existing Environment

- 23 The Property (**Appendix 4**) directly abuts the eastern side of the existing Ashley township. It is bounded by Canterbury Street to the north, with a line of dwellings (zoned SETZ) on land parcels of between 1,000 m² and 2,000 m². A small block of two parcels (1,012 m²; 4,983 m²) zoned RLZ with access to Canterbury Street is located on the north eastern boundary of the Property. To the west, the Property is bounded by Auckland Street. Directly across the carriageway of Auckland Street is a line of dwellings

zoned SETZ on lots of approximately 600 m² to 825 m², except for a largely undeveloped lot of 6,946 m² with only two dwellings on the western corner of Auckland Street and Lower Sefton Road. Lower Sefton Road forms the southern boundary of the property. Land between Lower Sefton Road and the Ashley River is zoned RLZ.

- 24 The Property is essentially the boundary between the township of Ashley to the west and the rural environment to the east. Two rural residential properties, with areas of four hectares and eight hectares, are located on the eastern boundary of the Property.
- 25 The Property slopes gently to the south west and has an overall elevation differential of approximately 5.0 metres between the north-west and southern boundary. It is covered in pasture with no noticeable vegetation. One single storied dwelling, with access to Canterbury Street, is located near the northern boundary of the Property. At the southern end of the Property there are some temporary stockpiles of gravel and soil.
- 26 A line of mature pine trees grow on part of the eastern boundary and form a visual distinction with the adjoining two rural residential parcels to the east.
- 27 Further descriptions of the Property relating to specific engineering and servicing matters are contained within the specialist reports (**Appendices 5 to 8**) supporting this Submission for rezoning.
- 28 Ashley township is a small township of 105 residential (SETZ) zoned properties; and an additional 13 residential dwellings on “residential” adjacent type parcels; making a total of 118 dwellings. Lots are generally in the range of 600 m² to 1,200 m² with 50% of the lots having an area of less than 900 m².
- 29 The township lies directly north of the Ashley River and is protected from floodwaters in the River by a stopbank on the true left bank managed by the Canterbury Regional Council. A railway line essentially forms the western boundary of the existing residential part of the township. West of the railway line is the existing Ashley Rural Residential (LLRZ) locality (No. 2 on **Appendix 9**) which is bounded by the railway line to the east, Fawcetts Road to the north, the Ashley River to the south, and Cones Road to the west. The Ashley River lies approximately 320 metres to the south / south-east.

- 30 In my opinion, the subject Property is the only logical area for the expansion of the Ashley township due to geographical and other constraints (**Appendix 10**). To the west of the township, the main railway line constrains development. To the north, the main railway line and Fawcetts Road further constrain logical development. The land south of Lower Sefton Road is close to the Ashley River, owned by the Canterbury Regional Council, lower lying, and subject to a higher flood risk than the subject Property. The Property therefore represents the only logical direction in which the township can expand.
- 31 The township supports a pub in the centre of the town, as well as a Community church, playcentre, and Council reserve and playground. Ashley Primary School and the Ashley tennis Club are located 230 metres north of the township.
- 32 Ashley township lies 4.8 kilometres (by road) from the centre of Rangiora township via the route along Fawcetts Road, the Cones Road bridge over the Ashley River; or 3.0 kilometres (direct line of sight) north-east of the Rangiora town centre.
- 33 There is currently no bus service or public transport option to the Ashley township. The nearest Metro bus service public transport is from River Road at the northern end of Rangiora to Christchurch which is 3.4 kilometres by road from the Ashley township. A major 'Park & Ride' facility ("Northern Rangiora Park & Ride") is located at River Road and includes dedicated carparks and security cycle park cages. The carpark is reserved for the use of Metro bus users and those who carpool or cycle into the Central City and is a joint facility by the WDC and Metro bus services. Two bus routes start from this Park & Ride facility: Route 91 (Rangiora to City direct); and Route 1 (Rangiora to Cashmere).
- 34 I have not examined this matter closely but it is possible that up to 70 additional single household residential dwellings in Ashley township could result in the extension of the bus service from the northern end of Rangiora requiring only a 3.4 kilometres extension. With respect to a comparison between an increase in the number of dwellings in the LLRZ location north west of Cones Road (**Appendix 9**) and the rezoning of this Property, the increased dwelling density directly adjacent to the existing Ashley township at a similar density, and closer to the end of the existing public transport route, is much more likely to result in an extension to public transport services than a more distant rural residential development

such as near to Loburn Lea. On this basis I consider that the requested rezoning of the Property is consistent with the provisions of the NPS-UD, and I will comment on this issue further in my evidence.

- 35 A dedicated “off-carriageway” cycleway and walkway, approximately 300 metres from Auckland Street, connects Rangiora township with Ashley township, a distance of 3.4 kilometres.
- 36 Potable water is supplied to the Ashley township from the Hurunui Rural Water Supply. Approximately 113 of the 118 existing dwellings are serviced by on-site septic tank. Five dwellings share a “community” sewage disposal field accessed from Auckland Street. It is understood that some of the existing septic systems on individual lots within the Ashley township may be underperforming (pers. comm. Elliot Duke 29 January 2024).
- 37 I note that the difference between the overall number of zoned dwellings and the overall number of dwellings in the Ashley township is that seven dwellings in the southwestern corner of the township (south of Lower Sefton Road) and three dwellings directly abutting the northern boundary of the Property are not zoned SETZ. However those dwellings are all on small allotments with the appearance of an SETZ zoning.
- 38 Further analysis of services is contained in the report by Mr Clem Maloney (**Appendix 5**). The Waimakariri District Council (“**the Council**”) has extended a sewer main across the Cones Road bridge to the northern bank of the Ashley River and considerable discussion has been held regarding extending the main to service the Ashley township (pers. comm. Gary Stevenson).
- 39 Several blocks of zoned land (No.3 on **Appendix 9**) located to the west and north west of the Ashley township are zoned RLZ, LLRZ, and some with a LLRZ overlay. This locality is discussed later in my evidence.

Previous Development Scenarios

- 40 The Submitter has owned the Property, and surrounding land, for 28 years, since 12 October 1995, and has contemplated the rezoning and the development of the Property for many years. The submitter has previously contemplated subdivision of the Property into 14 lots (2013), 31 lots (2017), and 52 lots (2021). The Submitter had also made an application for Government assistance on infrastructure funding including

a maximised subdivision of approximately 110 lots. The scheme enabled the Submitter to make this application for the funding support but the Submitter remained sceptical that this number of lots would be an ideal outcome in this location.

- 41 In April 2019, the Submitter lodged a resource consent application with the Canterbury Regional Council to undertake earthworks activities and to discharge contaminants to land and water for stormwater management from 28 residential lots. This resource consent application was withdrawn in 2023.

Proposed Rezoning & Site Suitability

- 42 The Property is zoned Rural in the Waimakariri Operative District Plan. The Rural zone permits subdivision with a minimum lot area of four hectares. Lots within the Ashley township are zoned Residential 3 (Res 3). The Res 3 zone permits subdivision with a minimum lot area of 600 m².
- 43 The Property is zoned RLZ (Rural Lifestyle Zone) in the Waimakariri Proposed District Plan which also allows subdivision to a minimum lot area of four hectares. Lots within the Ashley township are zoned SETZ which permits a minimum lot area of 600 m².
- 44 In summary, the provisions of the Proposed District Plan essentially alter neither the development and subdivisional potential of the Property or Ashley township.
- 45 I have provided a possible subdivision layout (**Appendix 11**) and commented above that a SETZ zoning will allow 93 residential allotments. This scenario of maximised SETZ density has been provided in order to show that the SETZ is possible in terms of both planning and engineering matters. However, the existing Ashley township has generally larger sections (**Appendix 12**) and the Submitter wishes to provide a development that is in keeping with the existing character of Ashley township.
- 46 On that basis, the Submitter wishes to undertake a subdivision of the Property based on sections with a minimum area of 800 m² in area that would provide an overall yield of approximately 70 sections (**Appendix 13**).

Other submissions

- 47 No Further Submissions were received in relation to the Submission of Mr Cameron (No.180). However, one submission (No. 250.3) was lodged by Ms Fiona Ashton (Ashton Submission) which seeks to either rezone Large Lot Residential Zone (LLRZ) Overlay at township edge locations, rural residential areas in the Waimakariri Rural Residential Development Plan 2019, and areas adjoining Settlement Zones; or completely to LRZ.
- 48 Specifically in the case of the Ashley township, the Ashton Submission seeks a “ring” of LLRZ zoned land entirely around the Ashley township. The mapping of the “ring” of affected land shows that it would potentially affect more or less the western half of the Property.
- 49 Generally, in the further development of urban areas and the future rezoning of urban areas around existing townships, there are two alternative approaches. One involves the rezoning of rural land to what is effectively rural residential, or large lot residential. The other approach is the rezoning of specific areas of rural zoned land simply to residential zoning allowing normal residential sized allotments.
- 50 It is my view that the zoning of rings of large lot residential land around settlements leads to inefficient development – especially with respect to servicing costs and the loss of productive rural land.
- 51 Specifically in relation to this Property, the Ashton Submission would rezone a strip of approximately 100 metres width along the western portion of the Property fronting Auckland Street leaving another strip of approximately 120 metres width on the eastern portion of the Property. In addition, the shape of the proposed “ring” is also problematic in that at the north eastern end of the proposed LLRZ the proposed zoning is only approximately 37 metres wide and 112 metres long.
- 52 The proposed split zoning of the Property would result in an irregularly shaped area of approximately 4.6 hectares rezoned to LLRZ; and the remaining area of approximately 3.4 hectares of Rural Lifestyle Zone (RLZ) creating an undersized allotment. A dwelling could not be erected on this undersized allotment without the Council granting its consent to a land use consent as a non-complying activity.
- 53 Furthermore, the proposed split zoning of the Property is also problematic with respect to the servicing of the LLRZ zoned land. The Council has

provided a sewage pump station and extended the sewer main from Rangiora across Cones Road to north of the Ashley River with the expectation that sufficient dwelling densities will be achieved in order for the main and pump station to be financially efficient. It is unfortunate that recently developed SETZ dwellings on the north side of Canterbury Street have installed septic tank systems rather than a comprehensive overall use of a community main to the existing pump station. The split zoning relief sought in the Ashton Submission would further exacerbate this scenario. Instead, by rezoning all of the Property to SETZ a sewer main will be required to connect to the Council pump station and service all of the residential lots on the Property, and eliminate any problems that could occur from the use of septic tank treatment systems.

- 54 It is for the above reasons that I do not support the Ashton Submission concept of a “ring” rezoning of properties, and the resultant split zoning of properties that it creates, both generally, and specifically in relation to this Property.
- 55 In larger rezoning proposals an Outline Development Plan is sometimes prepared to show primary and secondary roading routes, reserves, pedestrian routes, cycle routes etc. However, in this proposed rezoning, the area of the Property is sufficiently small that a draft Scheme Plan of Subdivision (**Appendix 13**) has been prepared instead. This shows a possible layout for the development only but should **not** be construed as a final layout. And while an ODP is not generally considered necessary for a site of this size that is held in single ownership, one can be supplied if it is deemed necessary, or as an alternative to the draft Scheme Plan.
- 56 The scheme plan of subdivision (**Appendix 11**) based strictly on the minimum lot area of the SETZ zone (600 m²) allows the formation of 94 lots (93 residential lots and 1 stormwater management lot. This theoretical scheme plan, has been drawn in order to calculate the *maximum* amount of services required with respect to potable water supply, stormwater management, sewer, power, and telephone. However, the eventual development will contain approximately 70 lots depending on market preference for the lot size. In numerous conversations with the owner of the Property, he has indicated that he intends designing the final subdivision with slightly larger lots (minimum 800 m²) both for the reason that he considers that these larger allotments would be more desirable to the market in this location, and also that it would be more in keeping with

the existing Ashley township. However, given that the SETZ zone is the most suitable zoning in the Proposed Plan, I have adopted this maximum yield for the purposes of my planning analysis, as have the engineering and servicing experts referred to below.

Expert reports

- 57 Mr Clem Maloney has prepared an engineering services report (**Appendix 5**) covering potable water supply, stormwater treatment and management, and sewage disposal. With respect to potable water supply, he has held discussions with the Hurunui District Council which supplies potable water to the Ashley township through the rural water supply scheme. The Hurunui District Council has been supplied with the possible scheme plan of subdivision (**Appendix 11**) and stated that it is technically possible to supply the potable water to the 93 lots. Exact engineering requirements would be designed at the subdivision stage.
- 58 Mr Maloney's design report addresses the stormwater treatment and management for the possible 93 lots. His design ensures that stormwater is managed so that the stormwater from the developed sites is directed to a stormwater basin in the south western corner of the Property (**Appendix 4**) and that there is no net increase in stormwater run off from the site. Subject to the Property being rezoned, resource consents relating to the stormwater management for the development of the Property will be lodged with the Canterbury Regional Council.
- 59 Mr Maloney (**Appendix 5**) has also investigated the disposal of sewage from the possible 93 lots. This conceptual design involves the connection of all of the possible 93 lots to an overall gravity sewer within the development with a pump station to the south western corner on the Property and then a sewer main to the Council's own pump station on Cones Road directly north of the Ashley River. In this way, the Council's own infrastructure will be utilised.
- 60 The report by Mr Elliot Duke (**Appendix 7**) regarding the geotechnical suitability of the Property concludes that the Property is suitable for residential development.
- 61 Mr Ian Lloyd (**Appendix 6**) has established that the flooding risk to the Property is within the acceptable parameters for residential development. This has also been confirmed by the Canterbury Regional Council. There are therefore no natural hazards associated with this Property.

- 62 This process concerns the rezoning of a site and is not a full resource consent application for a subdivision. However, in order to ensure that there are no basic constraints to prevent the site's use for residential development, an analysis of the possible contamination has also been undertaken. The Property is not registered on the LLUR (Listed Land Use Report). A full PSI (Preliminary Site Investigation) (**Appendix 8**) has also been undertaken of the Property by Mr Gareth Oddy. It concludes that in accordance with Regulation 8(4), the proposed subdivision activity and change of land use is considered to be a permitted activity as it is considered highly unlikely that soil contamination at the site presents an unacceptable risk to human health for future residential receptors. The rezoning of the Property and its use for residential development therefore complies with the provisions of the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health.
- 63 In addition to my own investigations, I have also relied on the information contained within the above reports in order to conclude that the Property is suitable to be developed for a residential subdivision subject to the provisions of the SETZ.
- 64 I have undertaken an analysis of the development potential of the existing SETZ zoned land within the township and (*very* conservatively) conclude that there is potential for approximately 36 additional sites (**Appendix 12**), as infill development, taking into account specific site constraints at each site such as the location of existing dwellings, but I remain sceptical that many of these potential sites will be developed even in the medium term. Furthermore, I have undertaken inspections of the subject Property and the Ashley township on numerous occasions. On 18 February 2024, I again inspected every site within the township and noted that there were only two properties advertised for sale, and no physical signs of infill development.
- 65 I have outlined above the other locations north of the Ashley River seeking possible rezoning and closer residential development. These locations are also shown on the plan (**Appendix 9**) and on the Waimakariri District Council Proposed Plan Review plan. It is notable that the subject Property is the only location out of all these locations in which a SETZ is being sought. All other locations north of the Ashley River seek either LLRZ Overlay (LLRZO), or LLRZ. The LLRZ allows the subdivision of land to a

minimum lot size of 2,500 m² but with a minimum average of 5,000 m², while the SETZ allows allotments with a minimum lot size of 600 m².

- 66 While some of the other locations shown in **Appendix 9** have been previously identified as being suitable for LLRZ development, these areas, and the locations being sought for rezoning through the Review process, could provide allotments at the 5,000 m² size. However, no areas have been identified to provide for smaller sized allotments. In my view, the proposed rezoning of the Property provides a greater choice of section size that will otherwise be almost completely lacking (apart from the possible infill development mentioned earlier) north of the Ashley River, and otherwise essentially only available in Rangiora, Kaiapoi, and Woodend / Ravenswood.
- 67 If the Property was rezoned (as an intermediate solution), only to LLRZ, resulting in an overall 15 residential lots, it may not be economical to develop given the requirement to build the sewer main from the Property to the Cones Road pumping station. Furthermore, it is likely (if not inevitable) that in the future, there would again be a request for the Property to be rezoned for higher density residential allotments given the constraints on the expansion of the Ashley township in any other direction (**Appendix 10**).
- 68 As outlined above, I have undertaken an analysis of the existing lot sizes in the Ashley township, and also its potential for infill development. I have identified that there is potential for some subdivision to 600 m² allotments. However, it is my view that the existing character of the township is presently more akin to a larger lot size. It is on this basis that the submitter has prepared a draft subdivision layout (**Appendix 13**) with a minimum allotment area of 800 m². The increase in the minimum lot area from 600 m² to 800 m² results in an approximate net yield of 70 lots (69 residential lots and one lot for the stormwater retention basin) compared to 93 lots.
- 69 I consider that this lot size is more in character with the existing Ashley township and will offer a level of amenity that is similar to what already exists. I note that the sites abutting the application site areas are generally commensurate with this 800 m². It contains the township within the physical constraints I have detailed previously and results in a compact township form that retains the character of the existing township.

- 70 The Property can be rezoned on this basis with a specific notation identifying the legal description of the Property in the SETZ zone provisions restricting subdivision to a minimum lot area of 800 m².

Planning Framework

- 71 **Canterbury Regional Policy Statement 2013** (Updated to July 2021): Chapter 5 of the CRPS differentiates between land within the 'Entire Region' and those provisions which are not relevant to Greater Christchurch are notated as 'Wider Region'. Map A in Chapter 6 of the CRPS identifies Greenfield Priority Areas and Future Development Areas in the 'Wider Region'. The Ashley township lies outside of the boundaries identified for Greater Christchurch but is only 3.4 kilometres from the edge of Rangiora and 4.9 kilometres to its centre. So benefits applying to developments within Greater Christchurch clearly also apply to Ashley Township
- 72 That future development north of the Ashley may be intended is inferred from the 'Waimakariri Residential Capacity and Demand Model – IP 2023' Economic Assessment (08 December 2023), which I discuss below. In addition, since the finalisation of the modified Map A (July 2021) a main sewer has been constructed to serve the settlement of Loburn Lea with improved sewer infrastructure and a pump station on Cones Road. This further signals an intension to increase capacity in this location.
- 73 **Appendix 9** shows all of the area that is subject to either a LLRZ Overlay zoning or LLRZ zoning. This results in the subdivision of land into allotments of 5,000 m². It is intended that all future lots within this locality will be required to connect to the Cones Road sewer/pump station.
- 74 The proposed zoning within the Proposed Plan provisions as notified will allow greater subdivision at what is essentially rural residential land north-west of the Cones Road / Ashley River intersection. In my view, a better planning approach is to rezone the subject Property with higher density and therefore greater efficiency with respect to servicing, transport, the use of land at the direct urban interface, and the preservation of soils for productive use.
- 75 Objective 5.2.1(1; 2) (Location, Design and Function of Development (Entire Region) states:

“Development is located and designed so that it functions in a way that:

- 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 (emphasis added)*
- 2. Enables people and communities, including future generations, to provide for their social, economic and cultural well-being and health and safety; and*

The proposed rezoning is directly adjacent to the only small lot residential zone north of the Ashley River and is the only logical direction in which the Ashley township can expand. It would provide a housing choice different to all other proposed areas north of the Ashley River in accordance with the Policy.

- 76 This approach is in accordance with the following CRPS Policies 5.3.1 and 5.3.5 which state:

5.3.1 Regional Growth (Wider Region)

To provide, as the primary focus for meeting the wider region’s growth needs, sustainable development patterns that:

- 3. Ensure that any*
 - a. Urban growth; and*
 - b. Limited rural residential development*

occur in a form that concentrates, or is attached to, existing urban areas and promotes a coordinated pattern of development;

- 4. Encourage within urban areas, housing choice, recreation and community facilities, and business opportunities of a character and form that supports urban consolidation;*
- 5. Promote energy efficiency in urban forms, transport patterns, site location and subdivision layout;*
- 6. Maintain and enhance the sense of identity and character of the region’s urban areas; and*
- 7. Encourage high quality urban design, including the maintenance and enhancement of amenity values.*

The proposed rezoning of the Property will concentrate a development directly alongside an existing urban area and will be in accordance with an existing urban form and character.

5.3.5 Servicing development for potable water, and sewage and stormwater disposal (Wider Region)

Within the wider region, ensure development is appropriately and efficiently served for the collection, treatment, disposal or re-use of sewage and stormwater, and the provision of potable water, by:

8. *Avoiding development which will not be served in a timely manner to avoid or mitigate adverse effects on the environment and human health; and*
9. *Requiring these services to be designed, built, managed or upgraded to maximise their on-going effectiveness.*

77 Policy 5.3.6 (Sewerage, stormwater and potable water infrastructure (Wider Region)) states that:

“Within the wider region:

1. *Avoid development which constrains the on-going ability of the existing sewerage, stormwater and potable water supply infrastructure to be developed and used.*
2. *Enable sewerage, stormwater and potable water infrastructure to be developed and used, provided that, as a result of its location and design:*
 - a. *the adverse effects on significant and physical resources are avoided, or where this is not practicable, mitigated; and*
 - b. *Other adverse effects on the environment are appropriately controlled.*

The proposed residential development of the Property will require a main sewer connection to the Cones Road pumping station. Ashley Township has no main sewer connection at present, and the ongoing development of individual lots within the Ashley township continue to use on-site septic tank solutions. The proposed rezoning facilitates the use of the main sewer connection to Cones Road, which would otherwise not occur.

The present, and proposed zoning, of the existing township, allows subdivision and residential development on lots of 600 m² but without a sewer to connect to any infill development can only occur using septic tank systems. It is generally accepted today that allotments of this size should be connected to a sanitary sewer in order to prevent groundwater contamination and other adverse effects.

- 78 Within Chapter 6 of the CRPS (Recovery and Rebuilding of Greater Christchurch) the following objectives are relevant to growth. While the Ashley township lies three kilometres outside of the 'Greater Christchurch' Map A of the CRPS, in my view it has significance as a settlement directly related to Rangiora township and to Christchurch and is effectively a natural extension of 'Greater Christchurch'.

Objective 6.2.1(3) avoids urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS;

The proposed rezoning is neither within an existing urban area nor within a greenfield priority area. However, it is my view that its proximity directly abutting the existing Ashley township and its provision of services provides reason for its rezoning.

Objective 6.2.1(9) integrates strategic and other infrastructure and services with land use development;

Objective 6.2.1(10) achieves development that does not adversely affect the efficient operation, use, development, appropriate upgrade, and future planning of strategic infrastructure and freight hubs;

Objective 6.2.1(11) optimises use of existing infrastructure;

The attached appendices relating to the provision of services show that the Property can be adequately serviced and facilitates the upgrade of the treatment and disposal of sewage within the Ashley township.

It is noted that Objective 6.2.1a (Housing Bottom Lines) outlines a prescriptive approach to providing "sufficient development capacity" within Greater Christchurch. However, two points can be made. First, such prescriptions arguably do not strictly apply at Ashley Township. And, second, the existing development capacity within the Waimakariri District has already been seriously questioned within the Recommendation report

of the Commissioners for the Plan Change 31 request. If those comments are correct, the rezoning of the Property will provide further required capacity in a compact efficient form and utilising existing Council services – rather than further rural residential development.

Objective 6.2.2 relates to urban form and settlement pattern within the Greater Christchurch area. Again, the Property is not strictly within the 'Greater Christchurch' area but its rezoning will provide further required residential development directly relating and directly abutting an existing urban area and in very close to proximity to the 'Greater Christchurch' area.

- 79 It is relevant that the CRPS was amended in 2021 following the identification of a shortfall in land for residential development identified at that stage. As I have also commented earlier, the Plan Change 31 Commissioner's report again identifies a further shortfall in land for residential development. The Submitter has not undertaken further analyses of available residential development land but relies on those findings and considers that there is sufficient demand in order to develop this property.
- 80 In conclusion, while the Ashley township, and specifically this Property, is located slightly outside of the 'Greater Christchurch' area, and therefore the proposed rezoning is not *strictly* required to accord with the objectives and policies in Chapter 6 for that reason, I consider that it is consistent with their wider context, and provides a more efficient and sensible planning model than other rezonings already being proposed through the Plan Review process.
- 81 **National Policy Statement: Highly Productive Land.** The NPS – Highly Productive Land states that it seeks to ensure the availability of New Zealand's most favourable soils for food and fibre production, now and for future generations. The Property is classified as Class 3 soils under the Land use Classification (source: Canterbury Maps). The Property is presently zoned Rural under the Operative Plan and is proposed to be zoned RLZ (Rural Lifestyle Zone) under the provisions of the Proposed Plan, allowing subdivision of the Property into two four hectare blocks. It is generally acknowledged that four hectare blocks are used for rural residential purposes.

- 82 The NPS-HPL provides (at 3.5(7)(b)) that the transitional definition of HPL, that applies prior to the mapping of HPL by regional councils, excludes land that may be zone general rural or rural production but is identified for (i) future urban development or (ii) subject to a Council initiated, notified plan change to rezone it urban or rural lifestyle. Therefore, given that the Property is proposed as RLZ, the NPS-HPL is not a relevant consideration.
- 83 In any event, I note that the whole of the existing Ashley township is located on Class 3 soils. Furthermore, as a comparison, all of the Loburn Lea (No. 5 on **Appendix 9**) land is of a classification of either Class 2 or Class 3. Within the other numbered areas on the plan (**Appendix 9**), all of the land east of Loburn Lea shown as No. 4 on the Plan is Class 2 land. The land notated as No. 2 consists of either Class 2 or Class 3 land. All of the soils within that location numbered as No. 3 is Class 2 land.
- 84 I make this comparison because these areas and the areas between those numbered areas shown on Appendix 9 are zoned LLRZ allowing one dwelling per 5,000 m² are located on Class 2 or Class 3 land (**Appendix 14**). While this might appear at odds with the approach of preserving HPL land for agricultural use, it is consistent with the notion that once land is zoned rural lifestyle, and subdivided accordingly, it is no longer able to be utilised for the full range of rural uses that require more extensive land-holdings.
- 85 In the recent *Drinnan* decision (Decision No. [2023] NZEnvC 180), the Court declined an application for the inclusion of land for residential development on the outskirts of the Prebbleton township in the Selwyn District. The Court signalled two relevant issues:
- a) *Does the land come within the exceptions for urban rezoning in cl.3.6 of the NPS-HPL?*
 - b) *If it does not, is the Drinnan land located in a rural lifestyle zone as defined by the National Planning Standards?*
- 86 Clause 3.6 of the NPS-HPL essentially restricts the urban rezoning of highly productive (rural) land unless it complies with the three thresholds:
- insufficient capacity; and,*
- no other reasonably practicable and feasible options; and,*

the benefits outweigh the negative effects of HPL for primary production.

87 The submitter has not undertaken a detailed analysis of the available residential development land within Waimakariri District. However, I have reviewed the Plan Change 31 recommendation report which contains a detailed analysis of the residential development capacity and demand within Waimakariri District. I have also reviewed the 'Waimakariri Residential Capacity and Demand Model – IP 2023' Economic Assessment (08 December 2023).

88 Section 2.3 (Page 11) (**Appendix 15**) shows areas that under the Proposed Plan provisions are proposed to be zoned LLRZ allowing 5,000 m² allotments. However, I find the following comment somewhat confusing:

*“**Ashley Overlay**: 73ha area to the north of Fawcetts Road and west of Boundary road, which will be available in the long term and is currently signalled to be Large Lot Residential Zone.” (my emphasis)*

I am somewhat perplexed by the above comment. Is there an implication that the proposed LLRZ land shown (**Appendix 15**) will eventually be some a higher density residential zone? If so, at what density?

89 Whether or not such future development is implied, there can be little doubt that further development north of the Ashley River is contemplated. With that being the case, development of the Property make logical sense as a starting point.

90 I note that the Waimakariri Residential Capacity and Demand Model predicts that the “*demand [for residential sections] will continue at high levels*” (para 3, page 20). Overall, the Study concludes that there is sufficient supply in the short to medium term (2023-2033) and in the long term (2023 - 2053). However, I note the qualification to the predictions in the report (last paragraph, section 4.1) which states that:

“However, as has been seen as a result of the earthquakes, Covid19, and recent weather events, the demand situation can change rapidly with people changing preferences to live in new locations than was previously anticipated. This inherent uncertainty is important issue for Waimakariri. While the Council is required by

the NPS-UD to update the assessment of demand and supply every three years we support the proactive stance of updating the assessment more regularly. This will ensure that the Council can pivot and change to match demand needs as they arise, including responses such as live zoning of future growth areas.”

- 91 Unfortunately, over the years I have seen many instances where the rezoning of *sufficient* land to match demand has not occurred in a timely fashion and market pricing has been affected as a result. In addition, the threshold to the successful rezoning of land in the planning process has increased significantly with increased cost and significantly greater timeframes. I do not consider that the process outlined in the quote above, combined with the rezoning process, is nimble enough to avoid negative market effects. I remain sceptical of the ability of planners and other allied professionals, in particular, and humans in general, to predict the future with much degree of certainty.
- 92 I note that the second threshold of the *Drinnan* decision asks the question whether the land is rural residential, which I've already discussed and have concluded it is since the Proposed District Plan will rezone the land from its present Rural zoning to RLZ, which is a Rural Residential Zone.
- 93 I also note that all land around Rangiora township that is identified on Map A Greenfield Priority Areas (green) and Future Development Areas (brown) of the CRPS as Greenfield Priority Areas or Future Development Areas is all either Class 2 or Class 3 land with respect to soil quality (**Appendix 14**). Furthermore, all Greenfield Priority Area (green) land on Map A that allows expansion of Woodend / Pegasus (and Ravenswood) is all Class 2 land. Likewise, all future development land on the western and northern edges of Kaiapoi shown for future development is also Class 2 and Class 3. There is no area on Map A within Waimakariri District identified for future urban development that is not Class 2 or Class 3 land. Therefore, it is clear that to provide for residential development close to Rangiora cannot avoid HPL. But I also consider that in order to preserve other HPL for agricultural use, then more, suitable, land should be zoned for close settlement residential development with less emphasis being placed on rural residential land.
- 94 Overall, I consider that, to the extent that it is relevant, the proposed rezoning does not offend the NPS-HPL.

- 95 **National Policy Statement: Urban Development** sets out objectives and policies for planning for well-functioning urban environments under the RMA. My overall understanding is that the NPS-UD was prepared in order to facilitate at least sufficient urban development. Under the NPS provisions Waimakariri District Council is a Tier 1 local authority.
- 96 Policy 1 of the NPS-UD requires that planning decisions contribute to well-functioning urban environments. I consider that the rezoning of this Property will provide a different variety of residential product to the market within very close proximity to Rangiora.
- 97 The allotments will be a product in a satellite town to Rangiora but be quite different to the RLZ product that will otherwise be provided here, and in the LLRZ locations identified north-west of the Ashley township (**Appendix 9**). The Property is very accessible to Rangiora township being 4.9 kilometres from the centre of the Rangiora commercial area.
- 98 Some of the locations adjoining Rangiora proposed to be rezoned in the PDP are 2.5 to 3.0 kilometres from the same centre of Rangiora. I consider that this difference is immaterial with respect to the need to consider effects on climate change. And while not at present being provided with public transport, the increase in total housing number in the Ashley township may increase the possibility of public transport services being extended from the Park & Ride facility at the northern end of Rangiora.
- 99 In my view, Ashley is well served with respect to active transport by the 'off carriageway' cycleway to Rangiora in accordance with Policy 1 and I have indeed cycled this route on numerous occasions. It is also otherwise well served by the main access road of Fawcetts Road and across the Cones Road bridge directly south into Rangiora.
- 100 I have commented above with respect to the provision of sufficient development capacity to meet expected demand and have noted that there is some difference between the findings of the Plan Change 31 Commissioner's recommendation report and the report entitled 'Waimakariri Residential Capacity and Demand Model – IP 2023' Economic Assessment. In my view, the rezoning of the Property is in accordance with Policy 2 of the NPS-UD in that it will assist in providing "at least sufficient capacity to meet expected demand for housing" and with a variety and in a location not otherwise provided for within the PDP.

- 101 Policy 6 requires that we must have regard to all RMA planning documents prepared in accordance with the NPS-UD and any change to amenity values as a result of the proposed rezoning. I do not consider that there will be any adverse effect on amenity values, especially given the change to the allotment size I outlined earlier.
- 102 Policy 8 requires the local authority to be responsive to Plan Changes:
- Policy 8: Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute well -functioning urban environments, even if the development capacity is:*
- (a) *Unanticipated by RMA planning documents;*
- (b) *Out-of-sequence with planned land release.*
- 103 To the extent that Policy 8 is relevant to a plan review, which may be considered an omnibus Plan Change, the rezoning of this Property results in a relatively significant increase in the development capacity, Ashley. It would also contribute a small increase to overall District capacity in a location otherwise unintended by the Proposed District Plan.
- 104 In my view, the implication in section 2.3 of the Waimakariri Residential Capacity and Demand Model – IP 2023’ Economic Assessment (**Appendix 15**) is that the locations north west of the Ashley township could eventually be rezoned from LLRZ to more intense residential development. If my interpretation is correct, it would be an incorrect development approach if the Property, abutting an existing township, and in close proximity to Rangiora were not rezoned and developed. On this basis, I do not consider that the rezoning of the Property is out-of-sequence with other development capacity increases.
- 105 In a similar way the rezoning of the Property is in accordance with Policy 10(b) in that it achieves an integrated land use of the existing Council sewage infrastructure.
- 106 Overall, I consider that the proposed rezoning is in accordance with the NPS-UD. The Property abuts an existing urban environment and is the most logical, and possibly the only direction of growth for the Ashley township. It will contribute to a well-functioning urban environment.

107 **Waimakariri Rural Residential Development Strategy 2019:** The Strategy provides the framework for the future provision of land zoned for rural residential purposes in the District. Specifically with respect to Ashley, page 17 of the Strategy states:

3. *Ashley/ Loburn*

The Ashley area borders the northern banks of the Ashley River. The Residential 3 Zone township (approximately 16 hectares) comprises 107 lots and the residential 4B Zone comprises 35 lots. The Loburn Lea Residential 4B Zone area is located north of the Ashley area (approximately 40 hectares) and contains 44 lots. These areas are surrounded by Rural Zone lots.

In my view the development of the subject Property is a more efficient method of providing the additional demand required than intensifying outer areas at lower densities; and also providing a different development outcome than would be produced by the other areas mentioned above.

108 **Ohoka Plan Change 31 Decision:** The Recommendation of the Commissioners to decline the Private Plan Change 31 application was confirmed last year by the Waimakariri District Council. However, the Commissioner's recommendation contained information regarding the housing capacity of the District that is potentially relevant.

109 The Applicant of the Private Plan Change 31 considered that the Council "*had significantly overestimated available housing capacity on the district due to errors in the input data used in the modelling which it says included land that was not available for development or errors in the degree of development anticipated in the model.*" (paragraph 70 of the Commissioner's recommendation). The report of the Commissioner's recommendation then analyses (paras 71 to 83 of the Recommendation) the conflicting evidence relating to the capacity of existing residential zoned land within the District and concludes that:

"If Mr Akehurst is correct, then the Council has not provided sufficient housing capacity in the medium and long term and positive action is required by the Council. We note here that the council is currently reviewing the District Plan and Environment Canterbury is intending to notify a review of the CRPS later next year. We would strongly recommend that irrespective of the outcome of this application the Council take steps to review the calculations provided by Formative and review

realisability of the areas currently identified for future urban growth within the District.” (para 84)

110 While the above statement of the Private Plan Change Recommendation does not *definitely* state that there is insufficient land rezoned within the Plan to adequately allow for residential growth within the District, it does raise very significant doubts that that is the case based on its in depth analysis.

111 And if there is a shortage of sufficiently zoned residential land on the market, it can have significant effects. There are considerable barriers to rezoning further land outside of this review process both in terms of time and cost to an applicant, with resultant effects on development costs, and ultimately market prices.

112 **Our District, Our Future – Waimakariri 2048:**

The overall approach of the District Development Strategy is to provide for greater residential growth in Rangiora, Kaiapoi, Woodend / Pegasus, and Oxford. With respect to the smaller settlements within the District, the Strategy identifies (page 20) that:

“These smaller settlements have not experienced the same growth pressures as the District’s larger centres. There have been 106 building consents issued for new houses in the period 2006 to 2016 for the Residential 3 Zone, with the majority of these in Waikuku (35), followed by The Pines Beach/ Kairaki (30), then Ashley (17). Community feedback sought to limit further growth in these settlements to protect their unique character, and avoid natural hazard impacts for beach settlements. These comments reflect policies within the operative District Plan that seek to maintain the compact form of the settlements.

The growth approach identified enables existing vacant areas in the small settlements to develop and provides for some further ‘organic’ expansion opportunities, generally consistent with historic growth rates. By focusing most new greenfield and intensification development in the District’s larger towns, the character of the District’s small settlements will generally be retained. This approach accords with the majority of feedback received on small settlements and the constraints that apply to some of them.”

113 Unfortunately, there is no information in the Strategy document at all that indicates how much feedback was received on the document, nor the

specific locations relevant to that feedback. It also appears that the emphasis in the document is on the retention of the character of the township rather than the blanket restriction of further greenfield development. However, the document is silent on the reason for this approach, except for the above comments which give no detail on the number of responses to the draft Strategy specifically in relation to the growth of small settlements nor to their location.

- 114 In fact, the document does not specifically examine Ashley township at all while concluding that growth should be limited to infill, regardless, it seems, of proximity to “larger urban areas”, potential demand if supply were to exist, and servicing opportunities and constraints. What it is clear is that from the physical geographical constraints (**Appendix 10**), any logical greenfields expansion of the Ashley township will need to be on the subject Property.
- 115 I have inspected the Ashley township “on the ground” and am quite sceptical that my very conservative estimate of an additional 36 infill residential dwellings will ever be achieved due in large part to the servicing constraints.
- 116 Furthermore, I note that the majority of residential development that has occurred on Residential 3 zoned land in the Ashley township has been on “new” sections rather than infill development, especially on the eastern and north eastern portions of the township where new houses have been built. The township character in this area is of new dwellings compared to the character at the older established western end.
- 117 The development of new dwellings on the subject Property will be in character with the existing development at the eastern and northern ends of the township.
- 118 Critically, it will facilitate the connection of the township – both existing and new development – to the Cones Road sewerage pump station. This is unlikely to occur without the residential development of the subject Property at the scale proposed. It will also support the existing services in the township of the pub, school, preschool, and tennis club, and make the addition of further services over time a more realistic possibility.
- 119 In summary, if the rezoning and development of the subject Property does not occur then Ashley Township will effectively be constrained from further

development as a consolidated township, as opposed to a cluster of large lot or rural residential sections.

- 120 The Strategy document also states that feedback (page 22) was received regarding rural residential options:

“Community feedback about rural residential options proposed in the draft Strategy was mixed, with most supporting new rural residential areas being identified and co-located with existing rural residential areas, or on the edge of existing towns. A smaller number supported intensifying within existing rural residential areas.”

The Strategy further states that *“over the last ten years approximately one quarter of all new houses in the District were located in rural areas, with 73% (1278) of these established on 4-4.99 hectare lots. (page 22)”*

My experience over the last 35 years is that this trend, if permitted, as it has been within the Waimakariri District, will continue despite the resulting change to the rural character of the District. Such change does not provide for cheaper smaller lot market requirements, and continues to erode the overall productive potential of the District’s HPL.

- 121 I have provided a possible subdivision layout (**Appendix 11**) and commented above that a SETZ zoning will allow 93 residential allotments. This scenario has been provided in order to show that the SETZ is possible in terms of both planning and engineering matters. However, the existing Ashley township has generally larger sections (**Appendix 12**) and the Submitter wishes to provide a development that is in keeping and character with the existing Ashley township.

- 122 On that basis, the Submitter wishes to undertake a subdivision of the Property based on sections with a minimum area of 800 m² in area that would provide an overall yield of approximately 70 sections (**Appendix 13**).

- 123 **Operative District Plan:** Policy 15.1.1.1 states: *“Integrate new development, subdivision, and activities into the urban environments in a way that maintains and enhances the form, function and amenity values of the urban areas”*.

- 124 The explanation to the Policy specifically mentions the township of Ashley together with the other small towns of Sefton, Cust, Ohoka, and Tuahiwi.

- 125 The form and function of Ashley is that it is directly accessible to Rangiora, and although physically separated, is in effect an outlier of Rangiora which provides Ashley Village with full access to its functions and opportunities. Policy 15.1.1.2 seeks to “*avoid, or mitigate adverse effects on the individual character of the settlement*”. In my view, the character of Ashley will be maintained by increasing the minimum lot size to 800 m² which presently is the approximate average lot size (which may decrease in the future due to possible later infill development). If design treatments are required to assist in the maintenance of character, these can be included at subdivision stage.
- 126 Policy 17.1.1.2 states: “*Recognise and provide for differences between Residential Zones reflecting the community’s expectations that a range of living environments will be maintained and enhanced*”. The Explanation to the Policy further states:

“The Residential 3 Zone reflects the view of the community that the beach settlements and small rural towns are different in character from the four main towns in the District. These differences largely stem either from their origins as holiday settlements, their small size, and low density of building. Servicing constraints such as at Allin Drive/Queens Avenue, Waikuku Beach which limit subdivision potential have the effect of maintaining the particular character of some settlements and towns”.

The Ashley township is physically different from the beach settlements in that it is located north of the Ashley River. Its main difference is its small size and relatively low density of building. However, I emphasise that there is potential for infill development and more recent development on the eastern and northern parts of the township has been on smaller lot sizes. While the servicing constraint with respect to sewer for infill development can continue to be overcome through septic tank use, the Regional Council has traditionally sought to introduce reticulated sewer into townships – as it has with Loburn Lea.

- 127 Table 17.1: Residential Zone Characteristics sets out the characteristics of the Residential 3 zone. These include:
- *Predominant activity is living*: Only the pub and school are not living activities.

- *Detached dwellings including a number of baches:* this characteristic is probably more appropriately assigned to the beach settlements.
- *High proportion of smaller dwellings:* While this characteristic is typical of the older Ashley township, the newer dwellings in the Ashley township are of a normal size typical of residential development in Rangiora, Ravenswood, and Kaiapoi.
- *Diverse styles and ages of dwellings:* there is now a significant number of new dwellings not only in the eastern and northern portion but also throughout the older part of the township. New houses on the Property will be part of the eastern newer end of the township.
- *Settlements are significantly smaller than other main towns:* the rezoning of the subject Property will however still keep Ashley as a small town compared to the three main towns in Waimakariri, while being of benefit to Rangiora (increased capacity nearby) and benefiting from its proximity.
- *Wide range of lot sizes:* I have shown that the average lot size is presently about 900 m² but is likely to decrease with any infill development. A minimum lot size for the Property will retain this range within the overall township.
- *A rural outlook and setting:* this aspect will be maintained because of the continued small size of the Ashley township.
- *Access to public open space:* the township directly adjoins the Regional Council Ashley River land to the south. Access to this area will be maintained.
- *Easy access to walking and cycling opportunities:* these are numerous but include the main cycle way to Rangiora

128 In summary, I consider that the proposed rezoning is in accordance with the relevant policies of the Operative Plan and will maintain the character and amenity of the township.

129 **Proposed District Plan:** Subject to changes during the Review process, the following provisions are relevant to this proposed rezoning.

Policy UFD-P2 Identification / location of new Residential Development Areas:

In relation to the identification/location of residential development areas (policies in *italics*):

1. *residential development in the new Residential Development Areas at Kaiapoi, North East Rangiora, South East Rangiora and West Rangiora is located to implement the urban form identified in the Future Development Strategy*; I have commented on this matter earlier in my evidence. The Proposed rezoning is outside of these areas but is part of the greater Rangiora residential area and provides a more sensible closer compact residential form than continued rural residential development.
2. *for new Residential Development Areas, other than those identified by (1) above, avoid residential development unless located so that they:*
 - a. *occur in a form that concentrates, or are attached to, an existing urban environment and promotes a coordinated pattern of development*; The proposed rezoning directly abuts the existing Ashley township and results in a compact residential form.
 - b. *occur in a manner that makes use of existing and planned transport and three waters infrastructure, or where such infrastructure is not available, upgrades, funds and builds infrastructure as required*; The Property is within the planned use of the major 'Park & Ride' facility at River Road. The existing but underutilised sewer to Cones Road will allow the Property to be connected to sewer and enable further infill development in the township to also eventually connect.
 - c. *have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport*; The Property is accessible by Fawcetts Road, and the cycleway/ walkway, and 'Park & Ride' facility.
 - d. *concentrate higher density residential housing in locations focusing on activity nodes such as key activity centres, schools, public transport routes and open space*; Not relevant.

- e. *take into account the need to provide for intensification of residential development while maintaining appropriate levels of amenity values on surrounding sites and streetscapes; The proposed rezoning will not intensify the residential form within the township but maintain its present character at 800 m² allotment size.*
- f. *are informed through the development of an ODP; An ODP is not considered necessary for this small 8 ha Property in single ownership (but can be supplied if required).*
- g. *Supports reductions in greenhouse gas emissions; and It is considered that there is effectively no difference in greenhouse emissions between the rezoning of outer areas near Rangiora and this Property. However, there is a considerable difference between the rezoning of this Property and more distant rural residential development.*
- h. *are resilient to natural hazards and the likely current and future effects of climate change as identified in SD-O6. The Property is not subject to any heightened risk of natural hazards.*

130 The purpose of the Settlement Zone is to provide for the smaller rural and beach settlements of the District – including Ashley Township. Policy SETZ-P1 Residential character states:

Provide for activities and structures that support and maintain the character and amenity values anticipated for the zone, which provides for:

1. *Predominantly residential activity, with density at the lower end compared to other Residential Zones;*
2. *Small scale commercial services that service the local beach and/or rural communities;*
3. *Cultural and spiritual activities, visitor accommodation, reserves and community facilities;*
4. *Provides for a pleasant residential environment interspersed with commercial activities, in particular minimising the adverse effects of noise and outdoor lighting, but providing for small scale signs as well as signs necessary to support commercial activities in the settlement while maintain (sic) a high level of visual amenity;*

5. *Maintenance of outlooks from within the settlements to rural areas; and*
 6. *Pedestrian movement, but with minimal use of kerb and channelling, and intimate and informal streetscapes.*
- 131 By restricting the minimum allotment area to 800 m² the existing lower density of the township will be maintained. The rural outlook will be maintained to the east and south to the Regional Council river land. Stormwater from the roads will be managed with roadside swales.

Overall Conclusion

- 132 The submission seeks to rezone eight hectares of Rural zoned land from RLZ to SETZ but with a restriction that the minimum lot size be 800 m² rather than the allowed 600 m². It is considered that this will assist in preserving the existing character and amenity of the Ashley township.
- 133 The proposed rezoning will provide a variety of living environment that is otherwise not provided for in the District Plan Review.
- 134 The proposed rezoning represents the only logical and feasible extension of the Ashley township with constraints in other three directions. The township otherwise can only be subject to infill residential development.
- 135 The proposed rezoning will facilitate the extension and use of the Cones Road sewer pumping station to the Ashley township enabling not only the immediate sewer connection of the lots created on the eight-hectare Property but also allow the longer term gradual connection of other properties and infill development within the township.
- 136 I consider that the rezoning accords with the overall planning framework under the CRPS including the “Greater Christchurch urban area”.
- 137 With respect to the preservation of land for productive use and the efficient use of roading and infrastructure, the rezoning represents a preferable and more sensible use of land than rural residential development to the north-west of Ashley township.
- 138 The proposed rezoning of 800 m² lots is a balance between providing higher density residential development on the one hand and recognising the existing character and amenity of Ashley township on the other.

139 In my opinion, there is no resource management reason why the Property should not be rezoned to SETZ. My view is reinforced if the 800 m² minimum allotment area is imposed.



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Peter Glasson

04 March 2024