

**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 by **Mark
and Melissa Prosser**

**EVIDENCE OF MARK DAVID ALLAN
ON BEHALF OF MARK AND MELISSA PROSSER
REGARDING HEARING STREAM 12C**

DATED: 24 April 2024

Presented for filing by:
Chris Fowler
Saunders & Co
PO Box 18, Christchurch
T 021 311 784
chris.fowler@saunders.co.nz

INTRODUCTION

- 1 My full name is Mark David Allan.
- 2 I hold the qualification of Bachelor of Resource and Environmental Planning (Hons) from Massey University.
- 3 I have been employed by Aurecon since 2004 where I currently hold the position of Director – Environment and Planning.
- 4 My previous work experience includes more than 20 years in the field of resource management, both in the public and private sector. The majority of this has been in land development (residential, commercial and industrial), infrastructure and telecommunications in the Greater Christchurch area and wider South Island, involving the preparation and oversight of resource consent applications, plan change requests and submissions on district plan reviews, and providing expert planning evidence in respect of the same.
- 5 This evidence is provided in support of the submission of Mark and Michelle Prosser (**the Submitter**) to rezone approximately 70 hectares of land on the northern boundary of Mandeville (**the Site**) from notified Rural Lifestyle Zone (**RLZ**) to Large Lot Residential Zone (**LLRZ**) subject to an Outline Development Plan (**ODP**) through the Proposed Waimakariri District Plan (**PWDP**). My role has been to provide planning advice on the appropriate zoning and rule framework for the Site.
- 6 I am familiar with the location and immediate surroundings of the Site.

CODE OF CONDUCT

- 7 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

- 8 I have prepared evidence in relation to:
 - (a) the Site and its context;

- (b) the relief sought by the submission, i.e., proposed LLRZ and ODP (**the Proposal**);
- (c) the effects of the Proposal;
- (d) statutory documents – various planning instruments that sit beneath the RMA;
- (e) Part 2 matters – key provisions from Part 2 RMA; and
- (f) Section 32AA evaluation.

9 In preparing my evidence I have considered the following:

- (a) the Prosser's submission;
- (b) the technical evidence dated 5 March 2024 prepared by:
 - (i) Mr Ian McPherson – Geotechnical
 - (ii) Mr Aaron Graham – Land Contamination
 - (iii) Mr Sharn Hainsworth – Land Use Capability
 - (iv) Mr Danash Sookdev – Water and Wastewater (including supplementary evidence dated 24 April 2024);
 - (v) Mr David Smith – Transport
 - (vi) Mr Vikramjit Singh – Urban Design
 - (vii) Mr Fraser Miller - Landscape
 - (viii) Mr Fraser Colegrave - Economics
 - (ix) Mr Stuart Ford – Land Productivity
 - (x) Mr Roland Payne – Ecology
 - (xi) Mr David Delagarza - Stormwater
- (c) the National Policy Statement on Urban Development 2020 (**NPS UD**), the Canterbury Regional Policy Statement (**CRPS**), the PWDP, and the Waimakariri Rural Residential Development Strategy June 2019 (**WRRDS**); and
- (d) 20-lot 4ha subdivision consent (RC205106, October 2020) and associated title plan for the Site.

SUMMARY OF EVIDENCE

- 10 The Proposal will would yield approximately 115 large lot residential allotments with a minimum average size of 5000 m² and minimum size of 2500 m², with subdivision and development guided by an ODP.
- 11 In summary, my evidence, informed by the technical evidence, concludes that:
- (a) the Site is within the 'Christchurch tier 1 urban environment', as identified by the NPS UD and depicted by the dashed line on Map A of the CRPS;
 - (b) the projected demand for rural 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 LLRZ land over and above that provided for in the PWDP;
 - (c) Mandeville is an appropriate location for further LLRZ development, being the largest and most populous rural residential settlement in (the Waimakariri District portion of) Greater Christchurch that has experienced strong growth over the past decade;
 - (d) the Site forms a logical and legible extension of the existing Mandeville settlement within walking distance of the Mandeville village centre;
 - (e) the Site is not highly productive land, does not engage the NPS HPL, and the loss of productive farmland as a result of the Proposal would be minimal;
 - (f) the Site is suitable for LLRZ-enabled development from both a geotechnical and contamination perspective;
 - (g) the Site and the Proposal have good internal and external transport connections across multiple modes;
 - (h) feasible options are available to service the Site with all the necessary infrastructure, with agreement and details to be refined through analysis at detailed design stage;
 - (i) flood risk and groundwater resurgence can be appropriately mitigated through the subsequent subdivision process;
 - (j) the Proposal will not result in the net loss of biodiversity, and most likely will achieve a biodiversity gain;

- (k) LLRZ-enabled development in accordance with the ODP will deliver a similar character and amenity as the existing areas of established rural residential development immediately west and south of the Site;
- (l) the Proposal provides significant additional LLRZ capacity in both a Mandeville settlement and District-wide context;
- (m) the Proposal enables more efficient land utilisation than the 4ha outcome contemplated by the existing subdivision consent for the Site, and overall is more appropriate than RLZ; and
- (n) the Proposal will give effect to the NPS-UD and the CRPS.

THE SITE AND ITS CONTEXT

The Site

- 12 The Site at 2 Ashworths Road (72.65ha comprised in Lot 6 DP 2038, CB21K/781) is highlighted yellow in **Figure 1**. Approximately 1.5ha of the adjoining 9 Aschens Road (5.3ha comprised in Lot 8 DP 314202, 56165) is highlighted red and is intended for stormwater management purposes as part of the Proposal. The Prossers are the directors of Ohoka Farm Holdings Limited, which owns both parcels (as well as the eight other 4-6ha lots accessed off Aschens Road).

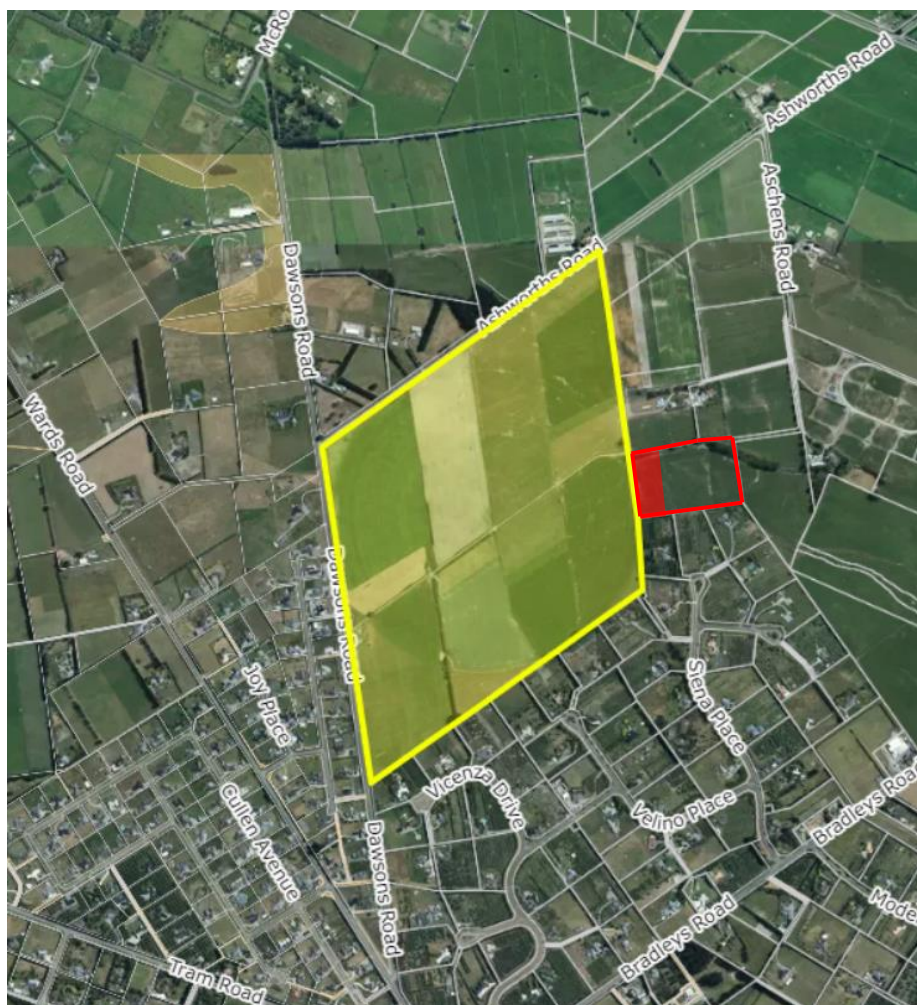


Figure 1: The Site (Source: Grip)

- 13 The features of the Site are described in detail in the technical evidence for the Proposal. To summarise, the Site is generally flat in topography and used for pastoral grazing and cropping, resulting in a predominance of open paddocks. Typical features include post and wire fencing, native plantings, exotic shelterbelts and hedgerows that define the Site's boundaries and internal paddocks. Two onsite springs located near the eastern boundary feed into a stream that flows south along this boundary and then eastwards along the northern boundary of 9 Aschens Road. There are no buildings on the Site.
- 14 The Site is bound by Ashworths Road (900m frontage, unsealed Local Road) to the north, Dawsons Road (900m frontage, sealed Local Road) to the west, several lots (4ha-6ha) to the east in the Submitter's ownership, and nine properties (1.5ha-1.7ha) to the south as part of the adjoining San Dona development.
- 15 The Submitters have obtained subdivision consent (RC205106, October 2020) for a 20-lot 4ha subdivision of the Site (**Figure 2**). In furtherance of this consent

a title plan has been created¹ for the purpose of gaining s223 approval (**Attachment 1**). It is appropriate to consider the approved 20-lot subdivision as part of the existing environment when comparing the relative merits of RLZ and LLRZ for the Site.

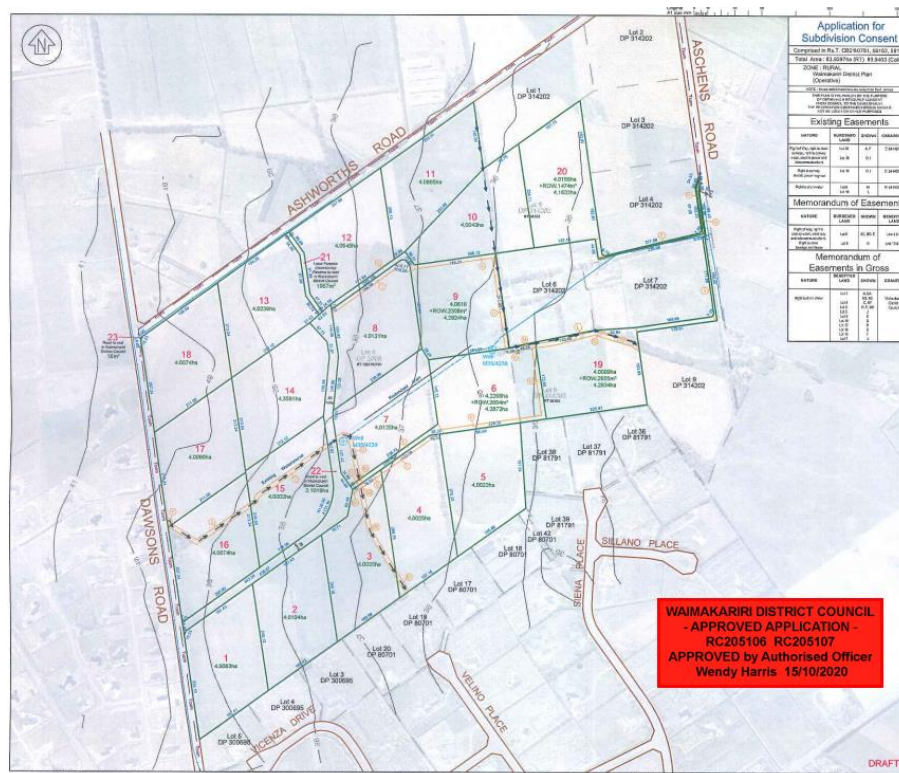


Figure 2: Approved 20-lot 4ha subdivision of the Site (Source: RC205106)

SITE CONTEXT / MANDEVILLE SETTLEMENT

- 16 Mandeville evolved as a rural residential area as early as 1983 when a Council Plan Change to the Eyre District Scheme enabled the development of approximately 44 rural residential lots between Tram Road, McHughs Road and Roscrea Place. Subsequent rural residential development has been enabled by a mix of plan change and resource consent processes, as illustrated in the chronology presented in **Attachment 2**.
- 17 As a result of this consistent growth over the decades, Mandeville is the largest established rural residential area within the District and the closest to Christchurch City (**Figure 3**). Comprising over 460 rural residential properties encompassing more than 350ha of land², the Mandeville settlement is

¹ The cost to the landowner of preparing this plan is approximately \$10k.

² Page 7, Waimakariri Rural Residential Development Strategy, June 2019

identifiable as predominantly residential in character within a rural or semi-rural setting.

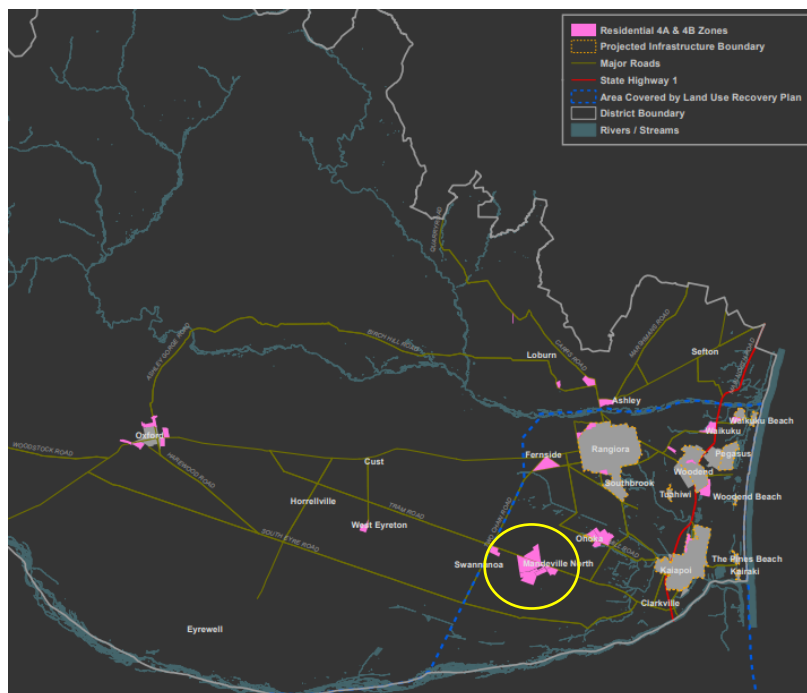


Figure 3. Existing rural residential zones in Waimakariri District (Source: Waimakariri Rural Residential Development Strategy, June 2019)

- 18 The Site is located immediately north of Mandeville, with the southernmost extent of the Site approximately 1km from the Mandeville Village Centre, making it closer to the Village Centre than other parts of Mandeville. The Village Centre comprises a petrol station, supermarket, hospitality and commercial services, and preschool. Mandeville has good open / recreational space provision commensurate with its rural residential character, including Mandeville Station Reserve (opposite the Village Centre), Mandeville Reserve (80ha public park home to multiple sporting and leisure activities and clubs), and Whites Road Recreation Reserve (corner Tram and Whites Roads).
- 19 The Mandeville Growth Boundary (**MGB**) (**Figure 4**) was introduced to the WDP in 2013/14 by the Waimakariri District Council (**Council**) via Plan Change 32 for the purpose of giving effect to the areas identified in the 2010 Rural Residential Development Plan for Waimakariri (**RRDP**) (the predecessor to the WRRDS).

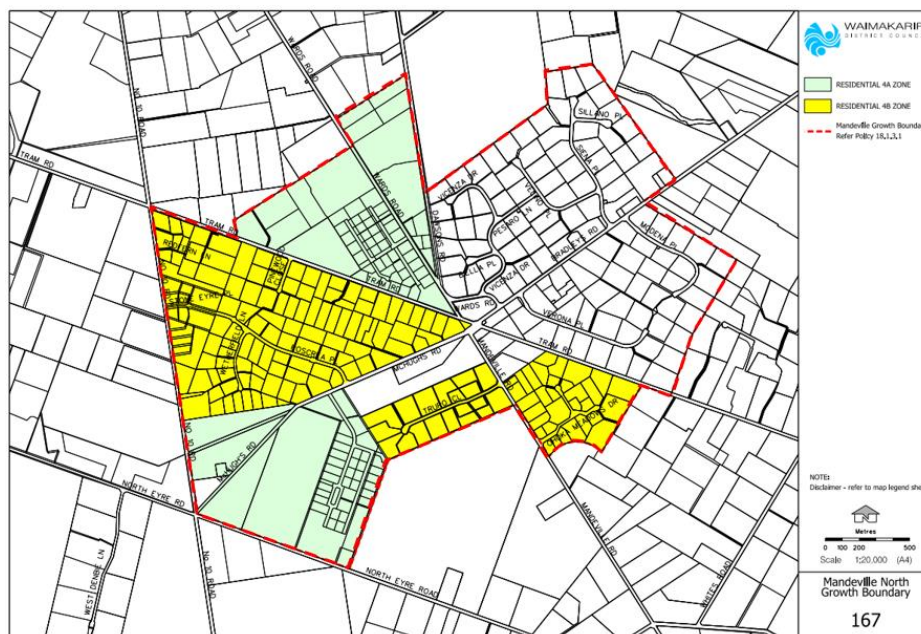


Figure 4. Mandeville Growth Boundary (Source: Map 167, Waimakariri District Plan)

- 20 Despite the considerable growth experienced at Mandeville, the MGB has not been altered since its introduction. Notably, Mandeville was excluded from consideration for further rural residential development in the WRRDS due to its 'special circumstances' status, i.e., *"a Mandeville Growth Boundary has been in place since 2012 to limit further sprawl, which will be carried over into the Proposed Waimakariri District Plan, in addition to undercurrents / groundwater resurgence, high groundwater levels and overland flows issues"*³.
- 21 In response to the 'special circumstances', I do not consider the fact the MGB has been in place for 12 years remains a valid reason to prevent further rural residential development at Mandeville, particularly in light of the current state of the rural residential housing market described by Mr Colegrave. A compounding annual growth rate of 4.9% between 2013 and 2023 has meant that the established rural residential areas in Mandeville are now mostly developed⁴. In short, the pent-up demand for rural residential housing in Mandeville cannot be met by the PWDP's notified LLRZ provision and there is a pressing need for additional land to be released in this area⁵.
- 22 For the reasons outlined in the urban design and landscape evidence and discussed elsewhere in this statement (paragraphs 29-32), I do not consider the Proposal will result in sprawl at Mandeville; rather, the Proposal will deliver

³ Page 10, WRRDS

⁴ Economics Evidence of Mr Colegrave, para 21

⁵ Economics Evidence of Mr Colegrave, para 83

additional rural residential supply in an appropriate location to achieve consolidated growth that is integrated with the settlement.

- 23 In terms of the other 'special circumstances', the technical evidence demonstrates that groundwater and overland flow issues can be appropriately managed through the subdivision consent process, detailed design and construction methodology. As such, these do not represent an insurmountable constraint to LLRZ-enabled development of the Site.

THE PROPOSAL

- 24 The Proposal seeks to rezone the Site from RLZ to LLRZ, which would yield approximately 115 large lot residential allotments with a minimum average size of 5000 m² and minimum size of 2500 m² (as per the notified LLRZ provisions).
- 25 Future subdivision and development of the Site will be managed through the proposed Northeast Mandeville ODP, a draft of which was included with the submission and has since been updated in light of subsequent technical evidence (**Attachment 2**).
- 26 Key features of the ODP (including changes made to the draft ODP included with the submission) are summarised below:

Intensive Primary Production Setback Area (300m setback)

- (a) Within this area Built Form Standard *LLRZ-BFS6 Building and Structure Setbacks* would apply, restricting the establishment of dwellings to avoid reverse sensitivity effects associated with the existing poultry farm at 87 Ashworths Road.

Indicative Road Layout

- (b) A new public road network comprising two main entrances midway along Dawsons Road and Ashworths Road;
- (c) The road connection to Dawsons Road has been moved to not be directly opposite the existing pedestrian and cycle connection from Dawsons Road to Warwick Road; and
- (d) The road connection to Ashworths Road has been moved outside of the Intensive Primary Production Setback Area, as this area will not be developed while the poultry farm is operational.

Proposed Waterway Enhancements, Setbacks and Protection

- (e) Waterway treatment and setbacks are in accordance with *Table NATC-1: Freshwater body setbacks* in the PWDP (5m for unscheduled freshwater bodies) and the recommendations in Mr Payne's ecological evidence;
- (f) 5m-wide native riparian planting / no build setback applies to the existing drain along the Site's eastern boundary, which will be naturalised and integrated within the proposed stormwater management area (**SMA**); and
- (g) 5m-wide riparian / no build setback applies to the existing water race along Ashworths Road and the two existing springs.

Pedestrian Connectivity

- (h) Footpaths along the local road network (one side only);
- (i) Pedestrian walkway within the reserve around the eastern SMA;
- (j) Pedestrian walkway connecting to Dawsons Road near the Site's southern boundary for more direct access and connectivity to the Village Centre; and
- (k) Footpath south of the new road connection to Dawsons Road and a dedicated pedestrian crossing point for connectivity with the existing pedestrian walkway between Dawsons Road and Warwick Road.

Appropriate Boundary Interfaces

- (l) 20m no build setback and 10m-wide native landscape strip along Ashworths Road and Dawsons Road;
- (m) No direct vehicle access from lots to Dawsons Road; and
- (n) Lower lot density (minimum 1ha), 50m no build setback and 10m-wide native landscape strip along the southern boundary (San Dona).

Proposed stormwater management and wetland restoration areas

- (o) Revised SMA's – the basin within the SMA on the draft ODP was oversized and not in the optimal location for site grades / overland flow paths, so ODP has been updated to show two SMA's;
- (p) Integration of existing onsite waterways into the stormwater management; and

- (q) Swale network along the proposed road network, utilising existing topography and overland flow paths to direct stormwater and groundwater run-off towards the SMAs.

Introduction text

- (r) Suggested introductory narrative to generally describe the proposed Northeast Mandeville Development Area and the key features of the ODP, consistent with that of other Development Areas in Part 3 – Area specific matters / Wāhanga waihanga - Development Areas of the PWDP. [NB. A suite of Activity Rules and Built Form Standards to accompany the Northeast Mandeville Development Area and ODP is intended to be supplied as supplementary evidence, again in keeping with the format of the other Development Areas]
- 27 The changes made to the ODP are considered within scope of the original submission for the following reasons:
- (a) the fundamentals of the ODP remain the same;
 - (b) the changes introduce additional features / controls to maintain or enhance environmental outcomes, particularly at the Site's interfaces; and
 - (c) the changes will not result in any increase in effects on persons that might have otherwise had an interest in the draft ODP included with the submission; rather they will reduce effects on such persons.
- 28 In addition to the ODP, future subdivision and development of the Site will be managed in accordance with the provisions of the PWDP, most relevantly those contained in the Large Lot Residential Zone, Subdivision, Transport, Natural Hazards and Earthworks Chapters. I have reviewed these provisions in the context of the Proposal and, in combination with the ODP, consider them appropriate for assessing and managing environmental effects associated with LLRZ-enabled development of the Site.

MERITS OF THE PROPOSAL – ASSESSMENT OF EFFECTS

Character, Amenity and Landscape

- 29 The Proposal will inevitably change the character, amenity and landscape of the Site and its immediate setting. The nature, extent and appropriateness of this change has been assessed in the technical evidence of Messrs Singh (urban

design) and Miller (landscape, visual and character). Collectively, their evidence concludes that the Proposal and LLRZ-enabled development of the Site is appropriate in the context of the established rural residential character of Mandeville and the wider rural / semi-rural setting.

- 30 It is relevant to consider changes in the character and amenity of the area in terms of Policy 6 of the NPS UD, which recognises that such changes are not, of themselves, an adverse effect. Both experts consider the Proposal presents a logical extension of the established rural residential character of Mandeville, and a more appropriate development outcome than the consented 20-lot subdivision of the Site.
- 31 The ODP has been designed to ensure LLRZ-enabled development integrates with neighboring development, with the nature and scale of development being generally consistent with that already established in the settlement. A larger lot overlay along the Site's southern boundary (San Dona) will provide an appropriate interface with the surrounding pattern of development, whilst also delivering a greater variety of lot sizes. Boundary treatment stipulated on the ODP is commensurate with surrounding land use and character, be it rural residential development to the south and west, or semi-rural / rural land use to the east and north.
- 32 Overall, any effects of the Proposal in terms of character, amenity and landscape matters are considered acceptable for the reasons set out in the technical evidence, and in the context of Policy 6 of the NPS UD. The Proposal will not change Mandeville's rural village character, but rather will serve to reinforce it through LLRZ-enabled development of the Site in accordance with the appropriately designed ODP.

Rural Residential Land Supply

- 33 Mr Colegrave's evidence assesses the District's population and housing context, the current state of the rural residential housing market, the economic rationale for the Proposal, and the likely wider economic impacts. He notes the strong population growth in recent years *is projected to continue well into the foreseeable future, which is causing strong and sustained growth in demand*

for additional housing. At the same time, housing in the district is becoming increasingly unaffordable⁶.

- 34 Mr Colegrave considers the latest available information on the supply of, and demand for, rural residential land in the District is now outdated, and as a consequence the pent-up demand for rural residential living cannot be met due to a lack of available zoned land. Because of the strong growth in Mandeville over the past decade, the established rural residential areas within the MGB are now mostly developed, while demand remains strong. It is on this basis that he concludes there is a pressing need to release additional LLRZ land⁷.
- 35 Mr Colegrave identifies the single ownership of the Site by a willing and able developer as a distinguishing feature, stating that the *“capacity enabled by the Proposal is likely to be converted to market supply in a timely manner”⁸* compared to other LLRZ overlay areas.
- 36 Should the Proposal not proceed, the recognised shortfall in LLRZ land would drive up the price of LLRZ allotments and undermine affordability⁹. Another consequence of this deficit in rural residential capacity is that buyers unable to attain LLRZ land instead opt for less-preferred larger (4ha) lots, leading to sub optimal land utilisation¹⁰.
- 37 Overall, the economic evidence is that LLRZ-enabled development of the Site represents a significant boost in rural residential supply, which will keep pace with demand for rural residential living in the District generally and the established Mandeville settlement specifically. The Proposal will generate a wide range of enduring economic benefits (e.g., economic activity and employment through construction and significant commercial support for local businesses) and avoid any material economic costs.

Transport

- 38 Mr Smith has assessed the functionality of the road network, interconnectivity between centres, and availability of different transport modes.

⁶ Economics Evidence of Mr Colegrave, para 11

⁷ Economics Evidence of Mr Colegrave, paras 12-15

⁸ Economics Evidence of Mr Colegrave, para 93(a)

⁹ Economics Evidence of Mr Colegrave, para 54

¹⁰ Economics Evidence of Mr Colegrave, para 82

- 39 Mr Smith's input to the ODP has ensured *the internal layout site is intuitive and well connected for all modes of transport, and that access points to the wider network provide safe and legible connections to the wider transport network*¹¹. The internal roading network and connections to the frontage roads will be designed and constructed in accordance with the transport provisions of the PWDP and the Waimakariri District Council Code of Practice¹².
- 40 Mr Smith recommends the Site's Ashworths Road frontage be sealed from the Dawsons Road intersection to at least 5m past the new road connection, noting the positive benefits to the roading network (i.e., reduced maintenance, improved road safety). This detail would be determined through the subdivision consent process to ensure the sealing is undertaken prior to establishing the new access onto Ashworths Road.
- 41 While there are no Metro routes servicing the Mandeville area, the Site is within a 15min drive to existing park-and-ride facilities in Rangiora and Kaiapoi that connect with the public transport network. Additionally, school buses service Mandeville (Oxford-Christchurch) and the surrounding areas, providing a feasible transport alternative to school drop off / pick up by private vehicle.
- 42 Mr Smith's overall conclusion is that the Proposal can be supported from a transport perspective and LLRZ-enabled development can be safely and efficiently accommodated on the roading network, with no wider impacts¹³. The transport provisions of the PWDP are appropriate for assessing the internal road design and site layout at the subdivision consent stage.

Three Waters Infrastructure

- 43 The evidence of Mr Sookdev confirms the Site is not currently served by wastewater or water supply infrastructure, assesses the Proposal's anticipated water supply and wastewater demand, and identifies the servicing options available for LRRZ-enabled development of the Site.
- 44 Mr Sookdev describes the feasible water supply options as a potential connection to the Council's Mandeville-Fernside Rural Restricted Water Supply Scheme, or a groundwater-sourced community drinking water supply. I note the Site holds a water take for irrigation purposes, and ECan's advice that the

¹¹ Transport Evidence of Mr Smith, para 25

¹² Transport Evidence of Mr Smith, paras 30-31

¹³ Transport Evidence of Mr Smith, para 49

Land and Water Regional Plan provides a consenting pathway for groundwater take and use for a community drinking water supply¹⁴, which would involve a significantly lower take than the current consented irrigation take.

- 45 In terms of wastewater, Mr Sookdev describes the option of either a Low Pressure Sewer System or a gravity collection system, both of which could be provided storage and off-peak discharge to manage potential capacity constraints, if required. The Council has advised that agreement on the upgrading of the existing pipeline from the Bradely Road pumpstation to the Rangiora Wastewater Treatment Plant would need to be reached prior to detailed design.
- 46 Stormwater management has been assessed by Mr Delagarza. Stormwater runoff will be managed via a combination of individual onsite soakpits, roadside swales (maintaining existing overland flow paths) and appropriately sized infiltration soakpits with two SMAs. The stormwater management will ensure the existing infiltration capacity of the Site will be maintained and the development achieves hydraulic neutrality.
- 47 Mr Delagarza addresses the potential effects of groundwater resurgence, which can include flooding of properties and structures, damage to roading infrastructure, and downstream flooding effects due to insufficient capacity in drainage networks or redirection of groundwater¹⁵. He notes that a detailed groundwater investigation will be undertaken as part of the subdivision design and consenting stages to quantify the groundwater patterns, including the location and magnitude of groundwater resurgence at the Site. This will inform groundwater and infiltration management approaches. Mr Delagarza considers groundwater management and flood management at the Site are complimentary and many of the measures undertaken to manage flooding hazards will also be effective in managing groundwater resurgence risks¹⁶.
- 48 The Site's environmental conditions do not preclude the Proposal from a servicing perspective. The technical evidence outlines the options available to feasibly service development to meet stormwater management, water supply and wastewater requirements.

¹⁴ LWRP "Rule 5.115 The taking and using of water for a community drinking water supply from groundwater or surface water is a restricted discretionary activity..."

¹⁵ Stormwater and Flooding Evidence of Mr Delagarza, para 35

¹⁶ Stormwater and Flooding Evidence of Mr Delagarza, paras 38-40

- 49 Overall, the technical evidence demonstrates that LLRZ-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 and in consultation with the Council's development engineers.

Tāngata Whenua and Cultural Values

- 50 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, and integral to cultural identity.
- 51 The Site is not subject to any known or identified silent files, statutory acknowledgement areas, wahi taonga, wahi tapu or other sites of significance to Māori under the PWDP. 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.

Flood Management

- 52 Mr Delagarza has undertaken a flood management assessment of the Proposal and LLRZ-enabled development of the Site.
- 53 The Council's flood risk map indicates most of the Site is located within a "low" or "very low" flooding hazard area, with only isolated areas of "medium" flood hazard and no "high" flood hazard¹⁷. It is possible to design development of the Site to alleviate this risk rating, e.g., appropriate freeboard above modelled flood levels, and locating structures outside of the few "medium" hazard areas. Mr Delagarza does not consider there will be impoundment or diversion effects from building platforms, given the slow velocities of flood flows, relatively low (20%) impervious coverage, and the small size of building platforms in relation to the floodplain. The Proposal will maintain existing overland flow paths to ensure floodwater and groundwater continues to move across the Site without adversely impacting surrounding properties¹⁸.

¹⁷ Stormwater and Flooding Evidence of Mr Delagarza, para 17

¹⁸ Stormwater and Flooding Evidence of Mr Delagarza, paras 47-51

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

Ecology

- 55 The ecological evidence of Mr Payne evaluates the ecological values and wetland habitats on the Site, assesses the ecological significance and fauna values against relevant policy, analysis the potential impacts of the Proposal and makes recommendations for biodiversity gains.
- 56 There is historical evidence of wetlands in the east and north of the Site and several old river channels and shallow depressions. No natural inland wetlands are present. Indigenous fauna and habitats are all highly modified and degraded, but still provide potential habitat for some At Risk indigenous species, as do the streams on and around the Site¹⁹.
- 57 The ODP adopts Mr Payne's recommendation that the waterways and springs on the Site be protected and enhanced with appropriate indigenous riparian planting. The current legislative framework (e.g. NES for Freshwater; NPS for Indigenous Biodiversity and Freshwater Management; CRPS chapters relating to freshwater, ecosystems and indigenous biodiversity, and beds of waterbodies and their riparian zones; Wildlife Act) provides for additional surveys for indigenous lizards, nesting birds and freshwater fauna to be requested, or indeed required, as part of any subdivision consent process and prior to construction works.
- 58 Based on the ecological evidence, the Proposal will result in at least no net loss of biodiversity, and most likely a biodiversity gain.

Reverse Sensitivity

- 59 Mandeville is an established rural residential settlement that transitions to the surrounding semi-rural and rural setting. In addition to the low-density nature of LRRZ-enabled development, Ashworths Road physically separates the Site from existing rural activities to the north. The Proposal accounts for potential reverse sensitivity effects associated with the existing poultry farm by identifying the Intensive Primary Production Setback Area on the ODP, within which sensitive activities are restricted. The Site shares its eastern and southern

¹⁹ Ecological Evidence of Mr Payne, paras 11-15

boundaries with rural residential properties, and its western boundary with Dawsons Road, the opposite side of which is occupied by established rural residential development. For these reasons I do not consider the Proposal raises any reverse sensitivity concerns.

Land Suitability

- 60 The Eliot Sinclair Preliminary Site Investigation (**PSI**) (included with the submission) concludes that the Site has been grazed and/or cropped since the 1940's, no HAIL activities have been (or are being) undertaken on the Site, and the land is suitable for the Proposal. Mr Graham's peer review and gap analysis of the PSI identified potential HAIL activities that were not identified by the PSI, however he considers any human health and environmental risk presented by the potential additional HAIL activities could be effectively mitigated/managed at the time of subdivision and or soil disturbance, and would not prevent the Site's suitability for LLRZ-enabled development²⁰.
- 61 The Eliot Sinclair Natural Hazards Risk Assessment (**NHRA**) (included with the submission) concludes that no risks associated with natural hazards were found that would be of concern to the Proposal. Mr McPherson's review of the NHRA, and further desktop investigations, confirms that the overall seismically induced liquefaction hazard is low, and any residual liquefaction risk can be readily accommodated through suitable engineering design at the time of subdivision²¹. Overall, the Site is considered geotechnically suitable for the Proposal.
- 62 The soil classification and productivity of the land has been assessed to determine the impact of the Proposal on the productive potential of the Site. From a soil and LUC perspective, Mr Hainsworth has identified only 11.8ha of the Site is classified as highly productive land according to the NPS-HPL definition²². Mr Ford concludes that the 11.8ha of land cannot be considered as commercially viable, and that the loss of productive farmland as a result of the Proposal will be minimal²³. I also note that a large part of the 11.8ha of land is located within the Intensive Primary Production Setback Area, so has

²⁰ Contamination Evidence of Mr Graham Primary, para 29

²¹ Geotechnical Evidence of Mr McPherson, para 21(b)

²² Soil Evidence of Mr Hainsworth, para 8

²³ Agricultural Productivity Evidence of Mr Ford, paras 75 and 80

development limitations in any event. On this basis, the loss of productive rural land is not an impediment for the Proposal.

Effects Conclusion

- 63 I consider that the actual or potential environmental effects of the Proposal will be akin to those already deemed acceptable through the progressive development and expansion of the Mandeville settlement. The changes to amenity values (including effects on urban form, landscape character and visual amenity) are not adverse when considered in the context of the established rural residential character of Mandeville and the positive effects of the increased housing supply enabled by the Proposal. The Proposal will achieve a consolidated urban form for Mandeville and any potential adverse effects of LLRZ-enabled development on the Site are able to be appropriately avoided or mitigated.
- 64 For the reasons expressed in the technical evidence, which has informed my views, I am satisfied that the effects of the Proposal will be appropriate and acceptable, particularly in light of the efficacy of the LLRZ provisions and the ODP to guide development that is considerate of the receiving environment. I accept the Proposal signifies, in a zone sense, a fundamental 'shift' from RLZ to LLRZ, however it more closely reflects the established rural residential character of the Site's context, enables more efficient land utilisation than the 4ha outcome contemplated by the subdivision consent, and contributes significantly to rural residential land supply. It is therefore more appropriate than RLZ.
- 65 Influential to my finding the effects of the Proposal to be acceptable, and the Proposal being the most efficient, effective and appropriate way to achieve the objectives of the PWDP, are the contextual and locational factors of the Site. These include the physical edge to the expanded settlement provided by Ashworths Road; the ability to provide for larger lots and appropriate interface treatment along established rural residential boundaries; the existing amenities (commercial, community, recreational) within a walkable catchment of the Site; the single ownership of the Site; and the fact Mandeville is the largest rural residential area in the District and the nearest to Christchurch.

STATUTORY DOCUMENTS

- 66 Section 74 of the RMA requires the PWDP be prepared in accordance with relevant national policy statements (**NPS**) and the CRPS ((1)(ea)) and with regard to any management plans and strategies prepared under other Acts ((2)(b)(i)).
- 67 Of the six current operative NPS, I consider the NPS UD to be relevant to the Proposal. Based on the technical ecological and soil classification evidence, I do not consider the Proposal engages the NPS on Indigenous Biodiversity, Freshwater Management or Highly Productive Land. Other relevant plans and strategies include the PWDP, the WRRDS, Mahaanui Iwi Management Plan (**IMP**) and the Greater Christchurch Spatial Plan (**Spatial Plan**).

National Policy Statement on Urban Development

- 68 The NPS UD represents the Government's latest thinking on how to encourage well-functioning and liveable urban environments. It aims to remove barriers to the supply of land and infrastructure and make room for growth. It applies to all planning decisions that affect an "urban environment", and requires the Council, 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." This is directly applicable to Mandeville, which is within the Christchurch tier 1 urban environment (as defined in the NPS UD and with reference to the commonly used term "Greater Christchurch"). I therefore consider the NPS UD applies to the Proposal.
- 69 My assessment of the Proposal against the NPS UD is contained in **Attachment 4** and summarised below.
- 70 Giving effect to the NPS-UD involves:
- (a) having 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 (Objective 1);
 - (b) making planning decisions that improve housing affordability (Objective 2);
 - (c) enabling more people to live in areas of an urban environment where there is high demand for housing (Objective 3);

- (d) recognizing that urban environments and their amenity values develop and change over time (Objective 4);
- (e) requiring decisions on urban development that affect urban environments to be integrated with infrastructure planning and funding decisions; strategic over the medium term and long term; and responsive to proposals that would supply significant development capacity (Objective 6);
- (f) using robust and frequently updated information about urban environments to inform planning decisions (Objective 7);
- (g) urban environments support greenhouse gas emission reductions and are resilient to the effects of climate change (Objective 8);
- (h) making planning decisions that contribute to well-functioning urban environments that have or enable a variety of homes that meet the needs of different households (in terms of type, price and location); have good accessibility; and support the competitive operation of land and development markets (Policy 1(b), (c) and (d));
- (i) Council providing at least sufficient development capacity to meet expected demand for housing over the short, medium and long terms (Policy 2);
- (j) when making planning decisions that affect the urban environment, regard is had to the planned urban built form anticipated by RMA documents that have given effect to the NPS UD, and the need to balance changes to amenity values against the benefits of increased housing supply and choice (Policy 6); and
- (k) a responsive approach to plan changes providing significant development capacity and contributing to well-functioning urban environments (Policy 8).

71 The NPS-UD directs the Council to provide for more housing to be built in places close to jobs, community services and public transport; and to respond to market demand. Assessing the Proposal in isolation of this higher order document would not present an appropriately balanced or considered view of the environment in which the Site is situated, particularly acknowledging the lack of available LRRZ land is contributing to pent-up demand for rural

residential living with a consequential impact on affordability and efficient land use.

- 72 Based on the nature and form of LLRZ-enabled development, and considering the technical evidence, I consider the Proposal would contribute to a well-functioning urban environment, i.e., integrated with an established rural residential settlement located near main urban centres, meeting the needs of the rural residential typology, and good accessibility to public or active transport commensurate with rural residential environments. The Proposal takes advantage of the Site's shape and location to contribute to a compact, consolidated settlement pattern in a location that will readily integrate with its surroundings.
- 73 For these reasons, and having considered the technical evidence, it is my view that Proposal is consistent with a well-functioning urban environment, will meet the general directive of the NPS-UD, and will provide much-needed development capacity. In short, I consider it will give effect to the NPS-UD more than would RLZ.

Canterbury Regional Policy Statement

- 74 The CRPS identifies the significant resource management issues facing the region, and sets out objectives, policies and methods to resolve these. The CRPS provisions of relevance to the Proposal are those contained in Chapter 5 (Land Use and Infrastructure) and Chapter 6 (Recovery and Rebuilding of Greater Christchurch). My assessment of the Proposal against these provisions is contained in **Attachment 5** 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.
- 75 While Chapter 5 applies to the entire region, the CRPS acknowledges that many issues associated with urban and rural residential development tend to be concentrated in the Greater Christchurch area, and for this reason the corresponding provisions are set out in Chapter 6 and take precedence.
- 76 The Proposal will ensure rural residential development contributes to residential capacity and occurs in a managed way to integrate with established rural residential development, infrastructure and transport networks. I consider the Proposal achieves consistency with Chapter 6 for the following reasons:

- (a) it will provide for rural residential development in a way that will maintain the established character and amenity of the Mandeville settlement and the surrounding semi-rural / rural area in a way that integrates infrastructure with land use development (Objective 6.2.1);
- (b) it will achieve a consolidated urban form and settlement pattern, and provide sustainable growth, in the District's largest established rural residential area (Objective 6.2.2(6), Objective 6.3.3, Policy 6.3.2);
- (c) while the Site is not identified in the WRRDS (discussed below), the Proposal is otherwise consistent with Policy 6.3.9 regarding rural residential development in Greater Christchurch, as:
 - (i) the Site is outside the greenfield priority areas, Future Development Areas and existing urban areas identified on Map A (sub-clause 2), LLRZ-enabled development is able to be appropriately serviced (sub-clause 3) and access is available to a sealed Local Road (sub-clause 4);
 - (ii) it does not give rise to significant reverse sensitivity effects with adjacent rural activities (5(g));
 - (iii) it avoids significant natural hazard areas and significant adverse ecological effects, and supports the protection and enhancement of ecological values (5(h) and (i)); and
 - (iv) it is able to be integrated into and consolidated with the adjacent Mandeville settlement (5(k));
- (d) the ODP sets out an integrated design for subdivision and land use, and provides for the long-term maintenance of rural residential character (6.3.9.6); and
- (e) the LLRZ provisions ensure the Site will not be regarded as in transition to full urban development (6.3.9.7).

77 Overall, it is my view that the Proposal is consistent with providing a consolidated urban form and settlement pattern and sustainable growth at Mandeville, will meet the general intent for the managed provision of rural residential development in the Greater Christchurch area, and will provide much-needed development capacity. The assessment demonstrates that the Proposal is broadly consistent with the key outcomes of the CRPS.

PWDP

78 The Proposal is assessed against the objectives of the PWDP in the Section 32AA Evaluation at **Attachment 6**. Based on that assessment, I consider the Proposal is generally consistent with the objectives of the PWDP relevant to LLRZ-enabled development of the Site:

- (a) it will improve the quality of the natural environment in respect of the natural features and potential habitat identified on the Site (SD-O1 Natural environment, ECO-O1 Ecosystems and indigenous biodiversity, NATC-O2 and -O3 Natural character and freshwater bodies);
- (b) it represents consolidation of and integration with Mandeville, an existing rural residential settlement predominantly urban in character, and will extend the range of housing options in the District (SD-O2 Urban development);
- (c) it will provides good integration and connectivity with active transport modes and commercial, community and recreational facilities in Mandeville, and convenient access to public transport networks in Rangiora and Kaiapoi (SD-O3 Energy and infrastructure);
- (d) it provides for more efficient utilisation of the land resource than RLZ or the 20-lot subdivision consent (SD-O4 Rural land);
- (e) the ground conditions (groundwater resurgence) and overland flow paths can be readily managed through detailed design to ensure natural hazard risk is appropriately mitigated (SD-O6 Natural hazards and resilience, NH-O1 Natural Hazards);
- (f) it will provide sufficient feasible development capacity to meet demand for rural residential land and housing (UFD-O1 Urban form and development);
- (g) options are available to service LLRZ-enabled development of the Site without compromising existing infrastructure (EI-O2 Energy and infrastructure);
- (h) it does not compromise the safety, resilience or efficiency of the transport network, and the Site is located within walking distance of existing commercial, community and recreational facilities in Mandeville (TRAN-O1 Transport);

- (i) the requirement for future subdivision to comply with the ODP and PWDP provisions relating the subdivision and land development activities in the LLRZ will deliver an integrated patterns of land use, development and urban form (SUB-O1 Subdivision design);
- (j) it will deliver rural residential development that is of low density on generous sites, with a predominance of open space over built form, without detracting from maintaining a quality residential environment (LLRZ-O1 Large Lot Residential Zone); and
- (k) it will not impact on the rural environment beyond the Site, despite reducing the area of rural zoned land (RURZ-O1 Rural Environment).

79 I have also reviewed the associated policies that support these objectives. Save working through a blow-by-blow account of each policy, I record that I have reached the same conclusion as above, and consider the Proposal is generally consistent with the supporting policies.

80 I acknowledge that rural residential expansion beyond the MGB is not anticipated in the WRDDS, and by consequence Policy 6.3.9 of the CRPS. However, for the reasons discussed above in respect of the higher order NPS UD, and below in relation to the WRDDS, I do not consider this should be an impediment to the provision of appropriately located rural residential land supply that will contribute to a well-functioning urban environment.

WRDDS

81 Policy 6.3.9 'Rural Residential Development' of the CRPS specifically provides for rural residential development in Greater Christchurch. The explanatory text for this Policy notes that *an important aspect of residential capacity includes the contribution of rural residential development* but that the extent of rural residential activity needs to be managed appropriately *due to the pressure it places on infrastructure, its impact on transport efficiency, and the maintenance of rural character and rural land use for production*.

82 The WRDDS supports this, acknowledging that rural residential development *efficiently manages the demand for semi-rural living by identifying 'clustered' locations for development, which helps to manage the balance of rural land for primary production and rural character purposes*²⁴. The WRRDS identifies

²⁴ Waimakariri Rural Residential Development Strategy 2019, p.3

growth locations for rural residential development across the whole District to meet a projected demand of approximately 385 rural residential households over the next 10 years. These locations have each been zoned LLRZ / LLRZO in the PWDP.

- 83 The WRRDS is already five years old. Mr Colegrave has described the shortfall of rural residential land supply in the District, and the need to provide for this land use and housing typology in the PWDP. Mr Colegrave's evidence is that the available information on the supply of, and demand for, rural residential land is now outdated. Simply put, demand for rural residential living cannot be met by the available zoned land. This is relevant to consideration of the Proposal against Policy 6.3.9 of the CRPS, which requires that new rural residential development beyond areas already zoned only be provided for where in accordance with the WRRDS.
- 84 While the Proposal may not be fully consistent with Policy 6.3.9, this part of the policy does not implement (or fully implement) the NPS UD because strict application of the WRRDS has the effect of constraining rural residential housing supply in circumstances where demand cannot be met by the available LLRZ in the notified PWDP.
- 85 Finally, despite the Site not being included in the WRRDS for other reasons of 'special circumstances', the technical evidence has shown that the servicing, groundwater and overland flow issues identified in the WRRDS are resolvable and are not a constraint to the provision of additional rural residential land in this location.

Mahaanui Iwi Management Plan

- 86 The IMP sets out a policy framework for the protection and enhancement of Ngāi Tahu values and for achieving outcomes that provide for the relationship of Ngāi Tahu with natural resources across an area extending west from the east coast to the Southern Alps, and south from the Hurunui River to the Ashburton River. It provides objectives and policies that identify values, priorities and processes that should be followed in the restoration and protection of the natural environment, as well as the planning and development of urban areas.
- 87 The Site is located within the area covered by the IMP. The IMP does not identify any specific values connected to the Site or its immediate surroundings.

For the reasons discussed in paragraphs 48 and 49 and in technical evidence, I consider the Proposal is consistent with the IMP as it relates to matters concerning natural and physical resources of special importance to the Runanga in the region.

Greater Christchurch Spatial Plan

- 88 The Spatial Plan was endorsed by the Greater Christchurch Partnership Committee in February 2024 and adopted by all Partner Councils (including the Council and ECan) as their Future Development Strategy to satisfy the requirements of the NPS UD. The purpose of the Spatial Plan is to set a desired urban form for a projected population of 700,000 (to 2051) to ensure Greater Christchurch is future-proofed in the context of population growth.
- 89 The geographic extent of Greater Christchurch area covered by the Spatial Plan is shown on Map 1, which corresponds to that shown on Map A in the CRPS. One of the Spatial Plan's priorities in creating a well-functioning and sustainable urban environment is to accelerate the provision of quality, affordable housing. To this end, it sets out how sufficient housing and business development capacity will be provided to meet expected demand over the next 30 years.
- 90 For the reasons discussed in regard to the NPS UD, and as set out in the technical evidence, I consider the Proposal supports the broad intent of the Spatial Plan. Notably, the Site is not subject to any Key Constraint Areas that development needs to be avoided, as identified on Map 5 of the Spatial Plan.

PART 2 MATTERS

- 91 The Proposal must accord with and assist the Council in carrying out its functions so as to meet the requirements of Part 2 of the RMA. The purpose of the RMA is to promote the sustainable management of natural and physical resources, as outlined in Section 5(2).
- 92 The PWDP application of zones and associated policy and rule frameworks sets out the Council's direction with respect to appropriate land use and activities within identified areas which are expected to achieve 'sustainable management'.
- 93 There are no Section 6 (Matters of National Importance) or Section 8 (Principles of the Treaty of Waitangi) relevant to the Site that must be provided for or taken

into account when exercising the functions and powers of the RMA and particularly when considering the appropriate zoning framework.

94 Section 7 (Other Matters) matters that I consider most relevant when considering the Proposal are:

(b) the efficient use and development of natural and physical resources:

(c) the maintenance and enhancement of amenity values:

(f) maintenance and enhancement of the quality of the environment:

(i) the effects of climate change.

95 I consider these matters to be relevant due to the Site's location and undeveloped nature at the periphery of the established Mandeville settlement, the consented 20-lot subdivision, and the shortfall in rural residential land capacity.

96 Due to the Site's distance from the coastal area, and based on the technical evidence that flooding risk can be managed, the Proposal is responsive to the impacts of climate change. The nature of rural residential settlements such as Mandeville is that many residents need to commute to main centres (e.g., Rangiora, Kaiapoi, Christchurch) for employment, community facilities, etc. This will be no different for the Proposal, however as noted the Site is well located in respect of local amenities (Village Centre, reserves, active transport networks) and within 15min drive of park-and-ride facilities. This supports shorter trips and transport mode choice, which represents a positive response to the effects of climate change.

SECTION 32AA EVALUATION

97 Section 32AA(1)(a) of the RMA requires a further evaluation in respect of the amendments sought to the existing proposal since the Council's Section 32 evaluation for the PWDP was completed. Essentially, assessment under Section 32AA is an evaluation of the Proposal compared to the notified provisions in the PWDP. Such an evaluation is to be undertaken in accordance with Section 32(1) to (4), including:

(a) The extent to which the objectives of the proposal are the most appropriate to achieve the purpose of the RMA; and

- (b) Whether the provisions in the proposal are the most appropriate way for achieving the objectives by including consideration of any other reasonably practicable options, the efficiency and effectiveness of the provisions in achieving the objectives, and reasons for deciding on the provisions.
- 98 The Proposal does not propose any changes to the objectives or rules of the PWDP. The purpose of the Proposal is to rezone the Site from RLZ to LLRZ to enable LLRZ development in accordance with an ODP.
- 99 I have undertaken a Section 32AA evaluation of the Proposal, assessing it against the status quo RLZ (**Attachment 6**). This evaluation, together with the body of my evidence, demonstrates that extending LLRZ across the Site, introducing an ODP and adopting the notified LLRZ provisions is the most appropriate way to achieve the purpose of the RMA. LLRZ will contribute to and maintain the clear delineation of the Mandeville settlement, while appropriately maintaining the character and amenity of neighbouring properties and contributing to a well-functioning urban environment.
- 100 The Proposal ensures the Council will retain appropriate discretion / control over future LLRZ-enabled development of the Site through the standard resource consent, detailed design and engineering processes. The benefit for the Prossers and the community is that there is a reasonable level of certainty that appropriate rural residential development will be enabled that is sympathetic to the established character of the settlement.
- 101 In my opinion, implementing the consented 20-lot subdivision would not be an effective or efficient alternative to the Proposal, particularly in light of the recognised shortfall of rural residential land supply. The environmental benefits discussed above and in the technical evidence would not be realized by the 20-lot subdivision consent.
- 102 In addition, seeking resource consent for the same development outcome on RLZ as that enabled by the Proposal would come at a significant cost and no guarantee of a successful outcome. These costs are unwarranted when the technical evidence confirms that the potential adverse effects of the Proposal can be appropriately remedied and mitigated. The cost benefit of the Proposal versus a prolonged (and uncertain) resource consent process will be substantial.

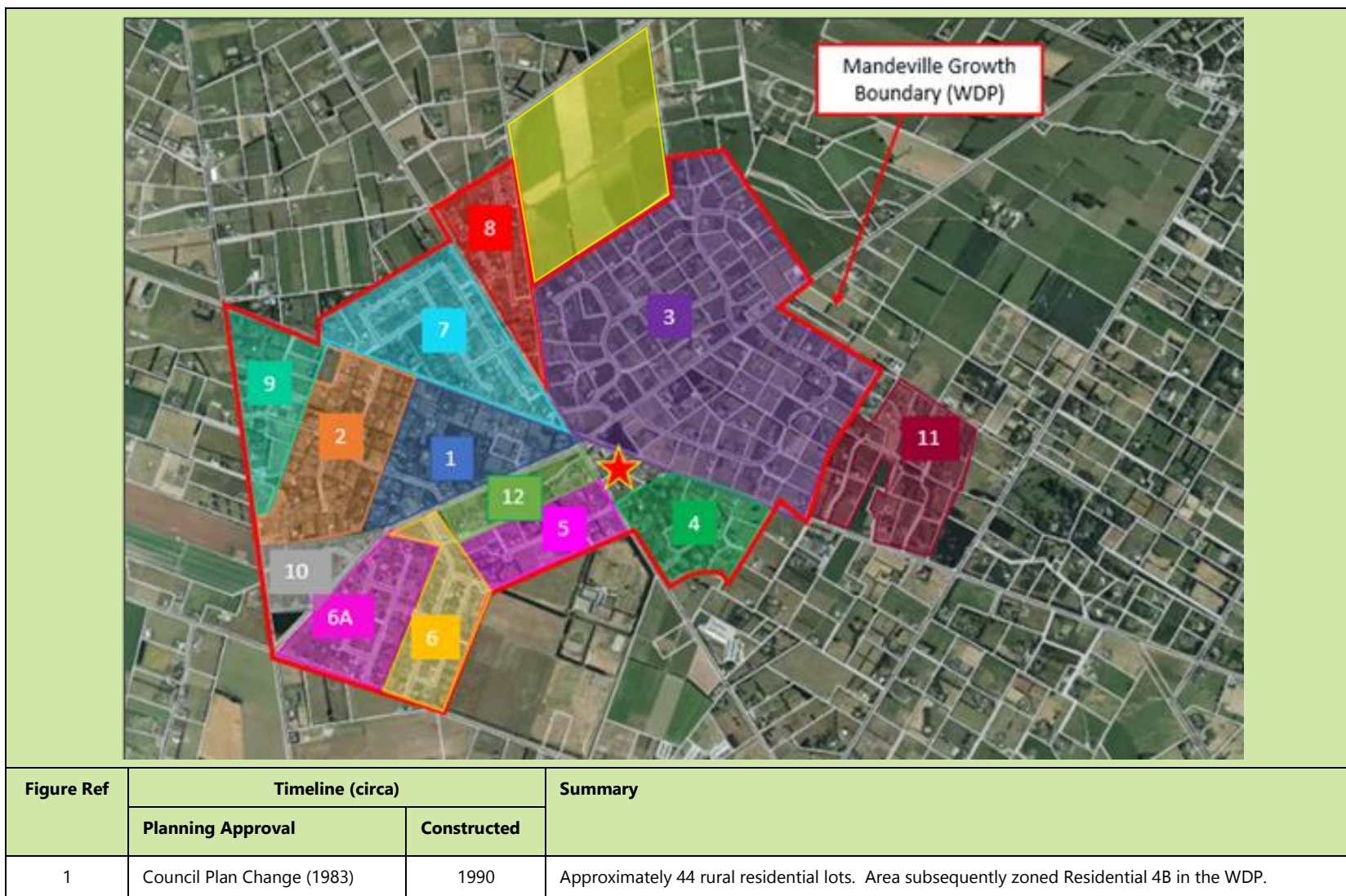
CONCLUSION

- 103 Overall, I consider the Proposal has merit and is the most appropriate outcome for the Site.
- 104 In the context of the recognised deficit of rural residential land supply and the directives of the NPS UD, the Proposal is the most efficient and effective means of giving effect to the NPS UD and the CRPS, and achieving consistency with the relevant objectives and policies of the PWDP.

Mark Allan
24 April 2024

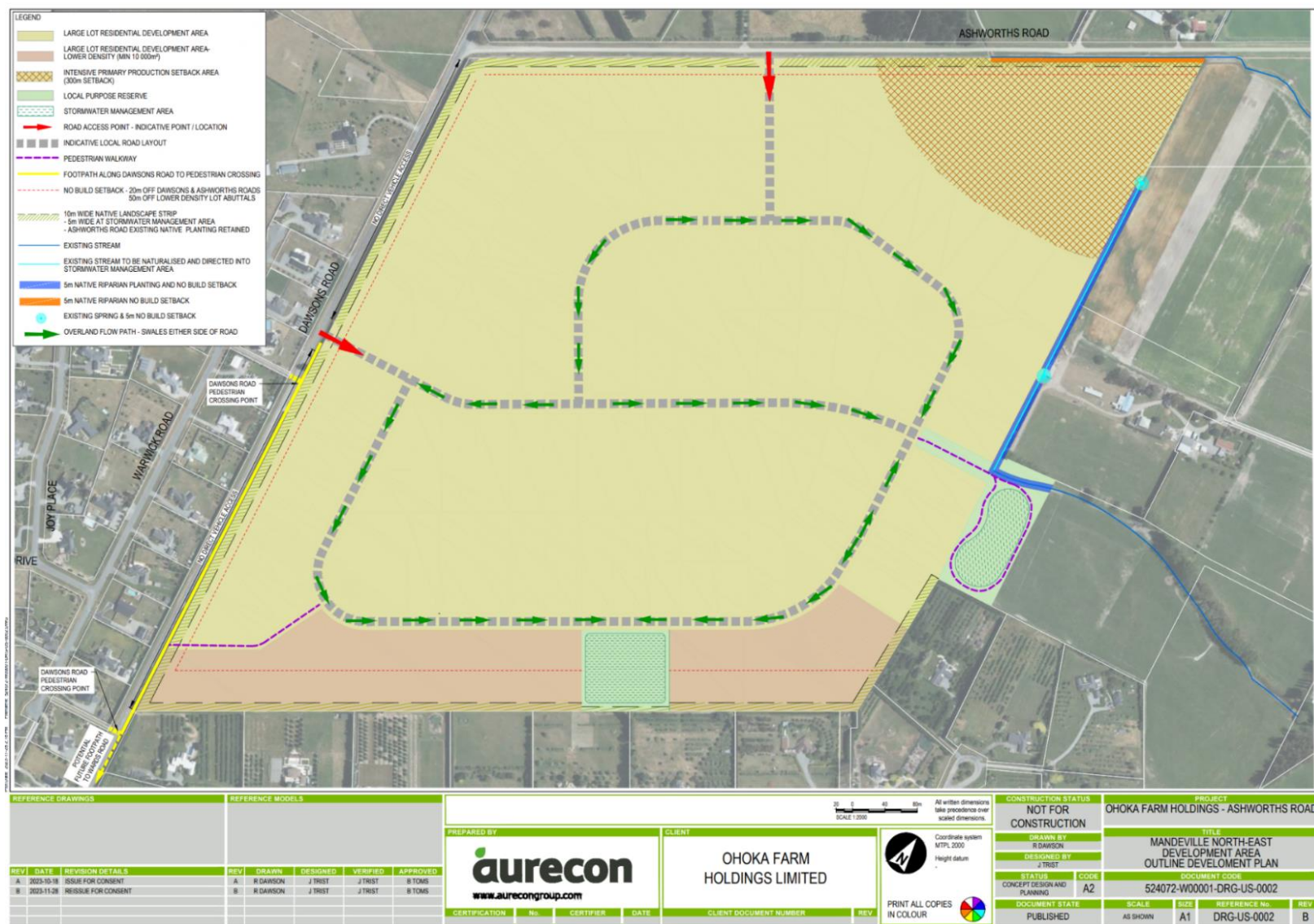


ATTACHMENT 2: CHRONOLOGY OF RURAL RESIDENTIAL DEVELOPMENT AT MANDEVILLE



2	Council Plan Change (1986)	2000	Approximately 69 rural residential lots. Area subsequently zoned Residential 4B in the WDP.
3	Resource Consents (1995-1999)	2005	The San Dona development encompasses approximately 240ha of rural residential development (approximately 115 lots, 1.5-2.5ha) established via resource consents in accordance with the "economic farm criteria". 115 Area remains zoned rural.
4	Private Plan Change (1996)	2000	Approximately 32 rural residential lots. Area subsequently zoned Residential 4B in the WDP.
5	Private Plan Change (1999)	2005	Approximately 21 rural residential lots. Area subsequently rezoned from Rural to Residential 4B under both the (Transitional Plan) Eyre District Scheme and the (then) Proposed District Plan.
6	Private Plan Change 6 (2010)	2012	Area rezoned Residential 4A enabling approximately 49 rural residential lots.
6A	Private Plan Change 22 (2014)	2015	Approximately 51ha rezoned Residential 4A enabling approximately 90 rural residential lots.
7	Private Plan Change 10 (2011)	2010-2014	Approximately 86ha rezoned Residential 4A enabling approximately 100 rural residential lots.
8	Private Plan Change 10 (2010)	2010-2014	Approximately 81ha rezoned Residential 4A enabling approximately 142 rural residential lots.
9	WDP (2005)	2010-2014	Area rezoned Residential 4B through the WDP process, enabling approximately 30 rural residential lots.
10	Private Plan Change 22 (2014)	2015-2019	Area rezoned Residential 4A enabling approximately 23 rural residential lots
11	Resource Consent (year unknown)	1995-1999	Approximately 18 rural residential lots (2.5-3ha). Area remains Rural Zone.
12	Private Plan Change 28 (2017)	2019	Area rezoned Residential 4A enabling approximately 21 rural residential lots.
	Council Plan Change 33 (2015)	2018	Approximately 5.4ha rezoned Residential 4A and Business 4, enabling approximately six rural residential lots and the Mandeville Village Centre comprising petrol station, supermarket, hospitality and commercial services, and preschool.

ATTACHMENT 3: NORTHEAST MANDEVILLE OUTLINE DEVELOPMENT PLAN



NEM –Northeast Mandeville Development Area

Introduction:

The Northeast Mandeville Development Area is located on the northeastern edge of Mandeville settlement. The area is a Large Lot Residential Zone that provides for low density residential activities.

Key features of the DEV-MNE-APP1 provide for:

- *Proposed local roads linking to Dawsons Road and Ashworths Road, and internal local roads providing access to allotments (with no direct vehicle access to individual allotments from Dawsons Road);*
- *Proposed pedestrian and cycle access along the internal road network, via a direct dedicated link to Dawsons Road and around the reserve area;*
- *Intensive primary production setback area to avoid potential reverse sensitivity effects;*
- *Lower residential density along the boundary interface with San Dona rural zoned land (lots minimum 10,000m² in area);*
- *Proposed stormwater treatment management and wetland restoration areas;*
- *Proposed waterway enhancement (including naturalisation of the drain along the eastern boundary), riparian planting and setbacks;*
- *Identification and protection of existing springs with the provision of setbacks to ensure they are safeguarded; and*
- *Landscape and boundary treatment requirements.*

ATTACHMENT 4: 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>The Proposal relates to the expansion of the established rural residential settlement of Mandeville in a manner that will maintain the character and amenity of the area, integrate with the surroundings and infrastructure, and provide for the needs of people and communities.</p>
<p>Objective 2: <i>Planning decisions improve housing affordability by supporting competitive land and development markets</i></p>	<p>The economics evidence is that strong population growth is projected to continue well into the foreseeable future, contributing to strong and sustained growth in demand for additional housing, while housing in the district is becoming increasingly unaffordable. The Proposal provides a significant boost in rural residential supply that will support competitive land and development markets.</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-serviced 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 Proposal will enable more people to live in an established urban environment that is near employment opportunities (proximity to the main centres of Rangiora, Kaiapoi and Christchurch City) and connections with the public transport network, and in an area experiencing high demand for rural residential housing.</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>The Proposal will enable the established rural residential settlement of Mandeville to continue to develop in response to the recognised demand for additional rural residential land, proving diversity and choice in the housing market.</p>
<p>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></p>	<p>The Site is not subject to any known or identified features or sites of significance to Māori. Any cultural values associated with the waterways and springs on the Site will</p>

	be appropriately managed through the subdivision consent process and engagement with tāngata whenua as appropriate.
<p>Objective 6: Local authority decisions on urban development that affect urban environments are:</p> <p>(a) integrated with infrastructure planning and funding decisions; and</p> <p>(b) strategic over the medium term and long term; and</p> <p>(c) responsive, particularly in relation to proposals that would supply significant development capacity.</p>	<p>The Proposal represents a significant increase in housing development capacity within the urban environment of both Mandeville and Greater Christchurch. It is required to address an identified shortfall in rural residential land supply, and is in a strategically preferred location adjacent to an established settlement. LLRZ-enabled development of the Site can be appropriately integrated with infrastructure planning and funding decisions.</p>
<p>Objective 7: Local authorities have robust and frequently updated information about their urban environments and use it to inform planning decisions.</p>	<p>The economics evidence is that the available information on the supply of, and demand for, rural residential land is now outdated. The exclusion of the Site from the WRRDS on account of Mandeville being subject to the 12yr old MGB is not a valid reason to preclude the Proposal, the merits of which have been informed by robust and up-to-date information on the current state of the rural residential housing market.</p>
<p>Objective 8: New Zealand's urban environments: support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change.</p>	<p>To the extent the Site is not near the coastal area and flooding risk can be managed, the Proposal is responsive to the impacts of climate change. The Site is well located in respect of local amenities within the Mandeville settlement, and within a 15min drive of park-and-ride facilities and connecting public transport networks, all of which support shorter trips and transport mode choice and represent a positive response to the effects of climate change.</p>
<p>Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:</p> <p>(a) have or enable a variety of homes that:</p> <p>(i) meet the needs, in terms of type, price, and location, of different households; and</p> <p>(ii) enable Māori to express their cultural traditions and norms; and</p>	<p>(i) The Proposal will enable the development of approximately 115 rural lifestyle properties ranging in size from 2,500 m² to 10,000m², with an average density of 5,000m². This will contribute to a variety of homes that meet the needs of different households.</p> <p>(ii) Not applicable</p> <p>(iii) The Site is within walking / cycling distance of Mandeville facilities, including commercial, recreational and early childhood learning facilities, and in</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>proximity of, and readily accessible to, larger centres (Rangiora and Kaiapoi) and existing public transport connections.</p> <p>(iv) The Proposal contributes to additional land supply for housing.</p> <p>(v) The Site is conveniently located to a range of existing facilities in the Mandeville settlement to meet the commercial, community and recreational needs of rural residential living. The Site is within a 15min drive of park-and-ride facilities and connecting public transport networks, offering shorter trips and transport mode choice that will support reductions in greenhouse gas emissions.</p> <p>(vi) For the same reasons as above, the Site and Proposal does not pose a risk in terms of climate change-induced hazards. Localised flooding risk can be readily managed and mitigated against through engineering design at the consenting and development stage.</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 enable more people to live in an existing urban area (Mandeville settlement) within the Greater Christchurch urban environment. It represents a significant contribution to addressing the identified shortfall of development capacity in the rural residential housing market.</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>(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>The Site is not within a city centre zone, metropolitan centre zone or within a walkable catchment of any of the areas specified in (c). In addition, it is not adjacent to the Mandeville Local Centre zone.</p>

<p>(d) 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.</p>	
<p>Policy 4: 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.</p>	<p>Not applicable.</p>
<p>Policy 5: 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:</p> <p>(a) the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services; or</p> <p>(b) relative demand for housing and business use in that location.</p>	<p>Not Applicable</p>
<p>Policy 6: When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters:</p> <p>(a) the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement</p> <p>(b) that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes:</p> <p>(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</p> <p>(ii) are not, of themselves, an adverse effect</p> <p>(c) the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1);</p>	<p>LRRZ-enable development of the Site will bring change to the character of the Site and the outlook from adjoining rural residential, semi-rural and rural properties, however the nature and character of development will be consistent and compatible with the that of the established settlement. While it is acknowledged that change in and of itself in not necessarily and adverse effect, it is relevant to note that there are no submissions opposing the Proposal.</p> <p>The Proposal will contribute to a well-functioning urban environment and support reductions in greenhouse gas emissions (as previously outlined).</p> <p>The residential yield represents a significant boost in rural residential supply that which help keep pace with demand for rural residential living in the District generally and the established Mandeville settlement specifically.</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>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>The economics evidence demonstrates that the Proposal will contribute to the attainment of housing bottom lines, recognising the identified shortfall in current and proposed land zoned for rural residential development.</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>The economic evidence is that demand for rural residential living cannot be met by the available zoned land. The Proposal will add significantly to rural residential housing capacity and contribute to a well-functioning urban environment. To the extent the Proposal may not be fully consistent with Policy 6.3.9 (Rural Residential Development) of the CRPS, the policy may not implement (or fully implement) the NPU UD by virtue of the WRRDS effectively constraining rural residential housing supply if the MGB is applied strictly. In this case, it is considered the Proposal satisfies the responsible planning provisions of Policy 8 and can be considered on its merits despite additional rural residential land at Mandeville not being anticipated by the WRRDS and, consequently, Policy 6.3.9 of the CRPS.</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>(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>The PWDP process has been undertaken in accordance with these requirements, and LLRZ-enabled development of the Site will engage Māori on issues of cultural significance through the subdivision consent process, as relevant.</p>

<i>(d) operate in a way that is consistent with iwi participation legislation.</i>	
<p>Policy 10: Tier 1, 2, and 3 local authorities:</p> <p><i>(a) that share jurisdiction over urban environments work together when implementing this National Policy Statement; and</i></p> <p><i>(b) engage with providers of development infrastructure and additional infrastructure to achieve integrated land use and infrastructure planning; and</i></p> <p><i>(c) engage with the development sector to identify significant opportunities for urban development.</i></p>	<p>LLRZ-enabled development of the Site will require engagement with infrastructure providers as part of the normal subdivision consent and detailed engineering design process to ensure integrated development is achieved.</p> <p>The Proposal represents a significant opportunity for development that will support the Council in its requirement to provide at least sufficient development capacity to meet expected demand for housing at all times, in accordance with Policy 2.</p>
Policy 11: In relation to car parking...	Not applicable.

ATTACHMENT 5: ASSESSMENT OF THE PROPOSAL AGAINST THE CRPS

CRPS Provision	Assessment
Chapter 5: Land Use and Infrastructure	
<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> 	<p>Mandeville has been identified as an established rural residential settlement by recognising the existing rural residential development with LLRZ.</p> <p>The Site adjoins the Mandeville settlement in a location that achieves a consolidated urban form. The Proposal will provide for the managed and coordinated expansion of the existing rural residential environment to the northeast of the settlement, with Ashworths Road providing a physical barrier to further growth in the semi-rural and rural environment north of the Site.</p> <p>It is appropriate that the identified demand for rural residential housing is provided for at the District's largest rural residential settlement in close proximity to the main centres of Greater Christchurch.</p>
Chapter 6 – Recovery and Rebuilding of Greater Christchurch	
<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>While the Site is within the Greater Christchurch urban environment and adjoins the Mandeville settlement that is predominantly residential in character, it is not an identified as a 'priority area' for urban development (1).</p> <p>Policy 6.3.9, which relates specifically to rural residential development in Greater Christchurch, provides the exemption to the "avoid" requirement of (3).</p> <p>The Site and the Proposal does not engage the matters addressed in (4), (10) or (12).</p> <p>The matters addressed in (5), (6), (8), (9) and (11) can be readily addressed through the subdivision consent process and detailed engineering design, as described in the technical evidence.</p>

<ol style="list-style-type: none"> 4. <i>protects outstanding natural features and landscapes including those within the Port Hills from inappropriate subdivision, use and development;</i> 5. <i>protects and enhances indigenous biodiversity and public space;</i> 6. <i>maintains or improves the quantity and quality of water in groundwater aquifers and surface waterbodies, and quality of ambient air;</i> 7. <i>maintains the character and amenity of rural areas and settlements;</i> 8. <i>protects people from unacceptable risk from natural hazards and the effects of sea-level rise;</i> 9. <i>integrates strategic and other infrastructure and services with land use development;</i> 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> 11. <i>optimises use of existing infrastructure; and</i> 12. <i>provides for development opportunities on Māori Reserves in Greater Christchurch.</i> 	<p>LLRZ-enabled development of the Site in accordance with the ODP and LLRZ provisions will maintain the character and amenity of the rural residential settlement and the wider semi-rural / rural environment (7).</p>
<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> <ol style="list-style-type: none"> 6. <i>Managing rural residential development outside of existing urban and priority areas; and...</i> 	<p>LLRZ-enabled development of the Site will be managed in accordance with the ODP and provisions of the PWDP to ensure rural residential development is integrated and compatible with the existing settlement.</p>

<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> <ol 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> 	<p>While the Site is not located within an identified priority area for development, it is within the Greater Christchurch area which corresponds to the Christchurch tier 1 urban environment as defined by the NPS UD.</p> <p>The Site adjoins Mandeville settlement, which is an established rural residential environment that is predominantly residential in character.</p> <p>Rural residential development in Greater Christchurch is expressly provided for by Policy 6.3.9.</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"> 1. <i>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> 2. <i>Integration – recognition of the need for well-integrated places, infrastructure, movement routes and networks, spaces, land uses and the</i> 	<p>The urban design evidence demonstrates that LLRZ-enabled development of the Site will give effect to the principles of good urban design, to the extent appropriate for rural residential development and the context of the existing form and extent of the Mandeville settlement.</p>

<p><i>natural and built environment. These elements should be overlaid to provide an appropriate form and pattern of use and development.</i></p> <ol style="list-style-type: none"> 3. <i>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> 4. <i>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> 5. <i>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> 6. <i>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> 7. <i>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><i>Policy 6.3.3 Development in accordance with outline development plans</i></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><i>Subdivision must not proceed ahead of the incorporation of an outline development plan in a district plan. Outline development plans and associated rules will:</i></p> <ol style="list-style-type: none"> 1. <i>Be prepared as:</i> 	<p>The ODP will guide future development of the Site, has been prepared as a single plan for the entire Site, and satisfies the relevant requirements of this policy.</p>

<ul style="list-style-type: none"> a. <i>a single plan for the whole of the priority area or Future Development Area; or</i> b. <i>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</i> c. <i>a single plan for the whole of a rural residential area; and</i> <p>2. <i>Be prepared in accordance with the matters set out in Policy 6.3.2;</i></p> <p>3. <i>To the extent relevant show proposed land uses including:</i></p> <ul style="list-style-type: none"> a. <i>Principal through roads, connections with surrounding road networks, relevant infrastructure services and areas for possible future development;</i> b. <i>Land required for community facilities or schools;</i> c. <i>Parks and other land for recreation;</i> d. <i>Land to be used for business activities;</i> e. <i>The distribution of different residential densities, in accordance with Policy 6.3.7;</i> f. <i>Land required for stormwater treatment, retention and drainage paths;</i> g. <i>Land reserved or otherwise set aside from development for environmental, historic heritage, or landscape protection or enhancement;</i> h. <i>Land reserved or otherwise set aside from development for any other reason, and the reasons for its protection from development;</i> i. <i>Pedestrian walkways, cycleways and public transport routes both within and adjoining the area to be developed;</i> 	
---	--

<ol style="list-style-type: none"> 4. <i>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> 5. <i>Identify significant cultural, natural or historic heritage features and values, and show how they are to be protected and/or enhanced;</i> 6. <i>Document the infrastructure required, when it will be required and how it will be funded;</i> 7. <i>Set out the staging and co-ordination of subdivision and development between landowners;</i> 8. <i>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> 9. <i>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> 10. <i>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> 11. <i>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> 12. <i>Include any other information that is relevant to an understanding of the development and its proposed zoning.</i> 	
Policy 6.3.4 Transport effectiveness	<p>The transport evidence demonstrates the Proposal will deliver a pattern of development that will integrate with existing transport networks within the Mandeville area with good connections to main centres beyond.</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> <ol style="list-style-type: none"> <i>1. avoiding development that will overload strategic freight routes;</i> <i>2. providing patterns of development that optimise use of existing network capacity and ensuring that, where possible, new building projects support increased uptake of active and public transport, and provide opportunities for modal choice;</i> <i>3. providing opportunities for travel demand management;</i> <i>4. requiring integrated transport assessment for substantial developments; and</i> <i>5. improving road user safety.</i> 	
<p><i>Policy 6.3.5 Integration of land use and infrastructure</i></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"> <i>1. Identifying priority areas for development and Future Development Areas to enable reliable forward planning for infrastructure development and delivery;</i> <i>2. 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"> <i>a. optimise the efficient and affordable provision of both the development and the infrastructure;</i> <i>b. maintain or enhance the operational effectiveness, viability and safety of existing and planned infrastructure;</i> <i>c. protect investment in existing and planned infrastructure;</i> 	<p>The technical evidence is that LLRZ-enabled development of the Site in accordance with the ODP can achieve integration of rural residential development and the requisite infrastructure without undermining the operational effectiveness of existing infrastructure.</p>

<p>d. ensure that new commercial film or video production facilities are connected to reticulated water and wastewater systems; and</p> <p>e. ensure new development does not occur until provision for appropriate infrastructure is in place;</p> <p>3. 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;</p> <p>4. 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 sensitive activities within the 50dBA Ldn airport noise contour for Christchurch International Airport... ; and</p> <p>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.</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> <p>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.</p> <p>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.</p> <p>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):</p>	<p>The proposal does not relate to residential development as anticipated in the identified greenfield priority areas. Map A does not identify existing or planned rural residential development in the Greater Christchurch area. Policy 6.3.9 is specific to rural residential development and is most relevant to consideration of the Proposal. That said, the Proposal will contribute to housing affordability by providing for zoned land in an appropriate location to deliver a range of lot sizes and densities commensurate with the rural residential character of the Mandeville settlement.</p>

<ul style="list-style-type: none"> a. 10 household units per hectare in greenfield areas in Selwyn and Waimakariri District; b. 15 household units per hectare in greenfield areas in Christchurch City; <p>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.</p> <p>5. Provision will be made in district plans for comprehensive development across multiple or amalgamated sites.</p> <p>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.</p>	
<p>Policy 6.3.9 Rural residential development</p> <p><i>In Greater Christchurch, rural residential development further to areas already zoned in district plans as at 1st January 2013 can only be provided for by territorial authorities in accordance with an adopted rural residential development strategy prepared in accordance with the Local Government Act 2002, subject to the following:</i></p> <ul style="list-style-type: none"> 1. <i>In the case of Christchurch City, no further rural residential development is to be provided for within the Christchurch City Plan area;</i> 2. <i>The location must be outside the greenfield priority areas for development, Future Development Areas, and existing urban areas;</i> 3. <i>All subdivision and development must be located so that it can be economically provided with a reticulated sewer and water supply</i> 	<p>The Proposal is not fully consistent with Policy 6.3.9 as the Site is located outside the MGB and therefore not in accordance with the WRRDS.</p> <p>Despite this, the Proposal will deliver much-needed land supply to the rural residential market in a manner that aligns with the NPS UD, and is otherwise consistent with the intent of Policy 6.3.9.</p> <p>A strict application of the WRRDS has the effect of constraining rural residential housing supply in circumstances where demand cannot be met by the available LLRZ in the notified PWDP. So while the Proposal may not be fully consistent with Policy 6.3.9, this part of the policy does not implement (or fully implement) the NPS UD.</p>

<p><i>integrated with a publicly owned system, and appropriate stormwater treatment and disposal;</i></p> <p>4. <i>Legal and physical access is provided to a sealed road, but not directly to a road defined in the relevant district plan as a Strategic or Arterial Road, or as a State highway under the Government Roding Powers Act 1989;</i></p> <p>5. <i>The location and design of any proposed rural residential development shall:</i></p> <ul style="list-style-type: none"> <i>a. avoid noise sensitive activities occurring within the 50 dBA Ldn air noise contour surrounding Christchurch International Airport so as not to compromise the future efficient operation of Christchurch International Airport or the health, well-being and amenity of people;</i> <i>b. avoid the groundwater protection zone for Christchurch City's drinking water;</i> <i>c. avoid land between the primary and secondary stop banks south of the Waimakariri River;</i> <i>d. avoid land required to protect the landscape character of the Port Hills;</i> <i>e. not compromise the operational capacity of the Burnham Military Camp, West Melton Military Training Area or Rangiora Airfield;</i> <i>f. support existing or upgraded community infrastructure and provide for good access to emergency services;</i> <i>g. avoid significant reverse sensitivity effects with adjacent rural activities, including quarrying and agricultural research farms, or strategic infrastructure;</i> <i>h. avoid significant natural hazard areas including steep or unstable land;</i> 	
---	--

<ul style="list-style-type: none"> i. <i>avoid significant adverse ecological effects, and support the protection and enhancement of ecological values;</i> j. <i>support the protection and enhancement of ancestral land, water sites, wāhi tapu and wāhi taonga of Ngāi Tahu;</i> k. <i>where adjacent to or in close proximity to an existing urban or rural residential area, be able to be integrated into or consolidated with the existing settlement; and</i> l. <i>avoid adverse effects on existing surface water quality.</i> <p>6. <i>An outline development plan is prepared which sets out an integrated design for subdivision and land use, and provides for the long-term maintenance of rural residential character.</i></p> <p>7. <i>A rural residential development area shall not be regarded as in transition to full urban development.</i></p>	
Chapter 7 - Freshwater	
<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><i>To identify the natural character values of fresh water bodies and their margins in the region and to:</i></p> <ul style="list-style-type: none"> 1. <i>preserve natural character values where there is a high state of natural character;</i> 2. <i>maintain natural character values where they are modified but highly valued; and</i> 3. <i>improve natural character values where they have been degraded to unacceptable levels;</i> 	<p>The Proposal recognises the presence of natural features on the Site and the ecological evidence demonstrates that the ODP will provide for their maintenance, restoration and enhancement. In this regard, the Proposal will result in at least no net loss of biodiversity, and most likely a biodiversity gain.</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><i>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>	
<p>Policy 7.3.3 Enhancing fresh water environments and biodiversity <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"> 1. <i>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> 2. <i>require the maintenance and promote the enhancement of indigenous biodiversity, inland basin ecosystems and riparian zones; and</i> 3. <i>promote, facilitate or undertake pest control.</i> 	
<p>Policy 7.3.4 Water quantity <i>In relation to the management of water quantity:</i></p> <ol style="list-style-type: none"> 1. <i>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"> a. <i>manage the hydrological connections of surface water, groundwater and the coastal environment;</i> b. <i>avoid long-term decline in groundwater levels and saltwater intrusion of coastal groundwater resources;</i> c. <i>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> d. <i>provide for any existing or reasonably foreseeable needs of surface water or groundwater for individual, marae or community drinking water or stockwater supplies;</i> e. <i>support the exercise of customary uses, including any flows required to maintain wetlands or water quality for customary uses; and</i> f. <i>support any flow requirements needed to maintain water quality in the catchment; and, having satisfied the requirements in (a) to (f), provide for:</i> 	

<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>The decline in the quality and quantity of Canterbury's ecosystems and indigenous biodiversity is halted and their life-supporting capacity and mauri safeguarded.</p>	<p>The Proposal recognises the presence of natural features on the Site and the ecological evidence demonstrates that the ODP will provide for their maintenance, restoration and enhancement. In this regard, the Proposal will result in at least no net loss of biodiversity, and most likely a biodiversity gain.</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>

Chapter 11 – Natural Hazards	
<p>Objective 11.2.1 Avoid new subdivision, use and development of land that increases risks associated with natural hazards</p> <p><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>The Site is not in a high hazard area and is not subject to unacceptable hazard risks.</p> <p>Potential groundwater resurgence, 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. The Proposal will maintain existing overland flow paths to ensure floodwater and groundwater continues to move across the Site without adversely impacting surrounding properties.</p>
<p>Objective 11.2.2 Adverse effects from hazard mitigation are avoided or mitigated</p> <p><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</p> <p><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>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> 	

<p>6. <i>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></p> <p>7. <i>Within greater Christchurch, relates to the maintenance and/or upgrading of existing critical or significance infrastructure.</i></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"> 1. <i>is of a type that is not likely to suffer material damage in an inundation event; or</i> 2. <i>is ancillary or incidental to the main development; or</i> 3. <i>meets all of the following criteria:</i> <ol style="list-style-type: none"> a. <i>new buildings have an appropriate floor level above the 0.5% AEP design flood level; and</i> b. <i>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).</i> <p><i>When determining areas subject to inundation, climate change projections including sea level rise are to be taken into account.</i></p>	
<p>Policy 11.3.3 Earthquake hazards</p>	

<p><i>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.</i></p>	
<p>Policy 11.3.5 General risk management approach</p> <p><i>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:</i></p> <ol style="list-style-type: none"> <i>1. the likelihood of the natural hazard event; and</i> <i>2. the potential consequence of the natural hazard event for: people and communities, property and infrastructure and the environment, and the emergency response organisations.</i> <p><i>Where there is uncertainty in the likelihood or consequences of a natural hazard event, the local authority shall adopt a precautionary approach.</i></p> <p><i>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).</i></p>	
<p>Policy 11.3.8 Climate change</p> <p><i>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</i></p>	

ATTACHMENT 6: SECTION 32AA EVALUATION

- 1 Section 32(1)(a) requires that an evaluation 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.

Objectives of the PWDP

- 2 Table 1 presents an examination of the Proposal in relation to the objectives of the PWDP, as required by Section 32(3).

Table 1: Assessment of the Proposal against the PWDP Objectives

PWDP Objective ²⁵	Assessment
SD: Strategic Directions	
<p>Objective SD-O1 Natural environment</p> <p><i>Across the District:</i></p> <ol style="list-style-type: none"> <i>there is an overall net gain in the quality and quantity of indigenous ecosystems and habitat, and indigenous biodiversity;</i> <i>the natural character of the coastal environment, freshwater bodies and wetlands is preserved or enhanced, or restored where degradation has occurred;</i> <i>outstanding natural features and outstanding natural landscapes are identified and their values recognised and protected;</i> <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 recognises the presence of natural features on the Site and the ecological evidence demonstrates that the ODP will provide for their maintenance, restoration and enhancement. In this regard, the Proposal will result in at least no net loss of biodiversity, and most likely a biodiversity gain.</p> <p>The Proposal will provide access to riparian areas and the Site is well located in relation to areas for open space and recreation within the Mandeville settlement and wider area.</p>

²⁵ The versions of the Objectives are those notified in the PWDP (and include the amendments sought by Variation 1).

<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><u>Objective SD-02 Well-functioning urban environments</u></p> <p><u>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.</u></p>	<p>The Proposal will deliver consolidated and integrated rural residential development with the existing (rural residential) urban environment, being a logical extension of the established Mandeville settlement.</p> <p>Ashworths Road provides an appropriate demarcation between the expanded settlement and the semi-rural / rural environment, which will serve to discourage further expansion north.</p>
<p><u>Objective SD-023 Urban development</u></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> 	<p>The Proposal recognises the existing rural residential character and amenity values of the Mandeville location, which LRRZ-enabled development of the Site will maintain through adherence to the ODP and notified LLRZ provisions of the PWDP.</p> <p>The technical evidence shows that options are available for the servicing LRRZ-enabled development of the Site without compromising the efficiency or effectiveness of existing infrastructure networks.</p> <p>The Proposal will provide additional rural residential housing that will contribute to a range of housing opportunities in the District's largest identified LLRZ area.</p> <p>The Proposal will support the hierarchy of urban centres within the District, specifically the Mandeville Village Centre (Local Centre Zone) through increased commercial activity.</p>

<ol style="list-style-type: none"> 6. <i>provides opportunities for business activities to establish and prosper within a network of business and industrial areas zoned appropriate to their type and scale of activity and which support district self-sufficiency;</i> 7. <i>provides people with access to a network of spaces within urban environments for open space and recreation;</i> 8. <i>supports the transition of the Special Purpose Zone (Kāinga Nohoanga) to a unique mixture of urban and rural activities reflecting the aspirations of Te Ngāi Tūāhuriri Rūnanga;</i> 9. <i>provides limited opportunities for Large Lot Residential development in identified areas, subject to adequate infrastructure; and</i> 10. <i>recognise and support Ngāi Tūāhuriri cultural values through the protection of sites and areas of significance to Māori identified in SASM-SCHED1.</i> 	
<p>Objective SD-O45 Rural land</p> <p><i>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:</i></p> <ol style="list-style-type: none"> 1. <i>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</i> 2. <i>ensuring that within rural areas the establishment and operation of rural production activities are not limited by new incompatible sensitive activities.</i> 	<p>The Site possesses only a small area of 'highly productive land' and overall is not commercially viable.</p> <p>Rural land beyond the expanded Mandeville settlement enabled by the Proposal will continue to be managed and available for productive rural activities commensurate with the RLZ.</p> <p>The Intensive Primary Production Setback Area on the ODP appropriately mitigates potential reverse sensitivity effects associated with the operations of the existing poultry farm on Ashworths Road opposite the Site.</p> <p>The benefits of providing additional rural residential housing capacity at Mandeville outweigh the costs that may be associated with the loss of land for rural production activities in what is an established rural residential environment, particularly in light of the directive provisions of the NPS UD regarding housing capacity and the identified shortfall of residential land supply.</p>
UFD - Āhuatanga auaha ā tāone - Urban Form and Development	

Objective UFD-01 Feasible Development Capacity for Residential activities <i>Sufficient feasible development capacity for residential activity to meet specified housing bottom lines and a changing demographic profile of the District as follows:</i>				Mr Colegrave’s evidence is that the Proposal will provide a significant boost to the rural residential housing supply market, and is necessary to achieve housing capacity in the medium term.
<i>Term</i>	<i>Short to Medium Term (2018-2028)</i>	<i>Long Term (2028-2048)</i>	<i>30 Year Time frame (2018-2048)</i>	
<i>Housing Bottom Lines (Development Capacity)</i>	<i>6,300 Residential Units</i>	<i>7,100 Residential Units</i>	<i>13,400 Residential Units</i>	
TRAN - Ranga waka - Transport				
Objective TRAN-01 A safe, resilient, efficient, integrated and sustainable transport system <i>An integrated transport system, including those parts of the transport system that form part of critical infrastructure, strategic infrastructure, regionally significant infrastructure, and strategic transport networks, that:</i> <i>1. is safe, resilient, efficient and sustainable for all transport modes;</i> <i>2. is responsive to future needs and changing technology;</i> <i>3. enables economic development, including for freight;</i> <i>4. supports healthy and liveable communities;</i> <i>5. reduces dependency on private motor vehicles, including through public transport and active transport; and</i> <i>6. enables the economic, social, cultural and environmental well-being of people and communities.</i>				Based on the transport evidence, the Proposal will support, and not compromise, the integrated transport system. LLRZ-enabled development of the Site in accordance with the ODP will support healthy and liveable communities and reduce dependency on private motor vehicles through the pedestrian and cycle connectivity with existing networks in Mandeville and access to park and ride facilities in Rangiora and Kaiapoi that connect with public transport routes. The subsequent consenting process provides the appropriate platform for assessing internal road design, external connections and site layout to ensure the wellbeing of people and communities and the safety and efficiency of the transport network.
NH - Matepā māhorahora - Natural hazards				
NH-01 Risk from natural hazards <i>New subdivision, land use and development:</i>				The Site is within the Non-Urban Flood Assessment Area. It is not in a high hazard area and is not subject to unacceptable hazard risks.

<div>1. manages natural hazard risk, including coastal hazards, in the existing urban environment to ensure that any increased risk to people and property is low;</div> <div>2. is avoided in the Ashley Fault Avoidance Overlay and high hazard areas for flooding outside of the urban environment where the risk to life and property are unacceptable; and</div> <div>3. outside of the urban environment, is undertaken to ensure natural hazard risk, including coastal hazard risk, to people and property is avoided or mitigated and the ability of communities to recover from natural hazard events is not reduced.</div>	<div>The technical evidence addresses the flood risk issues and concludes that with appropriate mitigation the Site is suitable for LLRZ-enabled development.</div> <div>Potential groundwater resurgence, 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. The Proposal will maintain existing overland flow paths to ensure floodwater and groundwater continues to move across the Site without adversely impacting surrounding properties.</div> <div>The risks of natural hazards to people, property and infrastructure are appropriately mitigated by compliance with PWDP rules about floor heights and other methods.</div>
NATC - Āhuetanga o te awa - Natural Character of Freshwater Bodies	
<div>Objective NATC-01 Preservation of natural character</div> <div>The preservation of the natural character of the surface freshwater environment, its wetlands, and lakes and rivers and their margins.</div>	<div>The Proposal recognises the natural features identified on the Site and the ODP provides for their maintenance / restoration and integration with future development. 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.</div>
<div>Objective NATC-02 Restoration of natural character</div> <div>Restoration of the natural character of surface freshwater bodies and their margins where degradation has occurred.</div>	
<div>Objective NATC-03 Use of freshwater body margins</div> <div>The use of wetlands, and lakes and rivers and their margins are managed to preserve their natural character.</div>	
SUB - Wāwāhia whenua - Subdivision	
<div>Objective SUB-01 Subdivision design</div>	<div>LLRZ-enabled development of the Site will be subject to the ODP and relevant provisions of the PWDP, and the resource consent process will</div>

<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>1. provides for anticipated land use and density that achieve the identified future character, form or function of zones;</i> <i>2. consolidates urban development and maintains rural character except where required for, and identified by, the District Council for urban development;</i> <i>3. supports protection of cultural and heritage values, conservation values; and</i> <i>4. supports community resilience to climate change and risk from natural hazards.</i> 	<p>provide the appropriate mechanism to assess subdivision's design its consistency with this objective.</p>
<p>Objective SUB-O2 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>	<p>The technical evidence demonstrates that options are available to service LLRZ-enabled development of the Site, which will also be well connected to the transport system with good access for all transport modes.</p>
<p>RESZ – Whaitua Nohonoho – Residential Zones</p>	
<p>Objective RESZ-O1 Residential growth, location and timing</p> <p><i>Sustainable residential growth that:</i></p> <ol style="list-style-type: none"> <i>1. provides more housing in appropriate locations in a timely manner according to growth needs;</i> <i>2. is responsive to community and district needs; and</i> <i>3. enables new development, as well as redevelopment of existing Residential Zones.</i> 	<p>The Proposal will provide for more rural residential housing to meet pent-up demand in a way that contributes to and integrates with the consolidated form of the established Mandeville settlement. The single ownership of the Site will enable the housing supply to potentially come to market sooner than other LLRZ areas under fragmented ownership.</p> <p>The Proposal will deliver a more efficient and sustainable use of the Site than RLZ (or the 20-lot 4ha subdivision consent), noting the limited productive potential of the Site's soils and the appropriateness of the location in the context of the existing settlement.</p>
<p>Objective RESZ-O2 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>The LLRZ provisions, in combination with the ODP, will deliver a form, scale and design of development on the Site that achieves compatibility and consistency with the established character and function of the Mandeville settlement, whilst maintaining a clear distinction with the LRZ and managing adverse effects at and beyond the Site's interfaces</p>
<p>Objective RESZ-O3 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"> 1. <i>achieves a good quality residential environment that is attractive and functional;</i> 2. <i>supports community health, safety and well-being;</i> 3. <i>maintains differences between zones; and</i> 4. <i>manages adverse effects on the surrounding environment.</i> 	<p>The Proposal will provide an increased supply of rural residential development in the currently undersupplied market. LLRZ is an identified residential zone, and LLRZ-enabled development of the Site will contribute to the range of residential type and densities sought by this objective.</p>
<p>RESZ-05 Housing choice</p> <p><i>Residential Zones provide for the needs of the community through:</i></p> <ol style="list-style-type: none"> 1. <i>A range of residential unit types; and</i> 2. <i>A variety of residential unit densities.</i> 	
<p>LLRZ-01 Purpose, character and amenity values of Large Lot Residential Zone</p> <p><i>A high quality, low density residential zone with a character distinct to other Residential Zones such that the predominant character:</i></p> <ol style="list-style-type: none"> 1. <i>is of low density detached residential units set on generous sites;</i> 2. <i>has a predominance of open space over built form;</i> 3. <i>is an environment with generally low levels of noise, traffic, outdoor lighting, odour and dust; and</i> 4. <i>provides opportunities for agriculture activities where these do not detract from maintaining a quality residential environment, but provides limited opportunities for other activities.</i> 	<p>The Proposal adopts the activity and built form standards of the proposed LLRZ. Adherence to these standards, combined with the ODP, will deliver a development outcome with a predominant character consistent with that anticipated by this objective.</p>
<p>RURZ – Whaitua Taiwhenua – Rural Zone</p>	
<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>	<p>Refer to discussion above in respect of Objective SD-O45 Rural land.</p> <p>The Proposal is considered a more efficient use of the land resource at the Site than development provided for and anticipated in the RLZ.</p>

<ol style="list-style-type: none"> 1. <i>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> 2. <i>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 provisions of the RLZ would deliver a similar subdivision and land use outcome on the Site as that authorised by the 20-lot subdivision consent. The technical evidence is that this density of development is suboptimal to that which would be enabled by the Proposal.</p> <p>The Proposal will not undermine or limit the ability of the surrounding semi-rural and rural environment to deliver on the pattern of development anticipated in the LRZ, which will continue to provide an appropriate transition from the rural residential densities of an expanded Mandeville and the General Rural Zone.</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>	

3 On the basis of the above assessment, the Proposal is considered to be consistent with the PWDP Objectives.

Efficiency and Effectiveness

4 In assessing the benefits and costs of the Proposal, the following options have been considered:

- (a) Option 1: Retain the proposed RLZ; and
- (b) Option 2: Rezone the Site to LLRZ in accordance with the Proposal and ODP.

5 The benefits and costs of each option are outlined in Table 2 below:

Table 2: Benefits and costs assessment

Benefits	Costs
Option 1: Retain the proposed RLZ	
<ul style="list-style-type: none"> • Remains consistent with rural residential / rural character and amenity outcomes for the locality. • Mandeville settlement maintains its existing form and extent within the MGB. • No additional capacity for infrastructure required. • No additional traffic generation. • No costs to the landowner or Council. 	<ul style="list-style-type: none"> • On-going opportunity costs for landowners; • Demand for rural residential land in the District unmet, with consequential increase in property prices and unaffordability. • Cost of plan administration – pursuing rural residential development through non-complying resource consent process would be costly, subject to density-related avoidance provisions, uncertain and could contribute to unplanned growth with limited integration with existing land use and infrastructure. • Economic costs in terms of jobs through construction and reduced economic activity to support Village Centre. • Constrains rural residential development to existing LLRZ areas, which has been identified as insufficient to meet demand. • Natural features on the Site are not restored / enhanced. • Implementation of the 4ha subdivision consent represents inefficient use of the Site.

Option 2: Rezone the Site to LLRZ in accordance with the Proposal and ODP

- | | |
|---|--|
| <ul style="list-style-type: none"> • Consistent and compatible with the established rural residential character of the District's largest settlement. • More households located within a 2km radius of the Mandeville Village Centre, supporting the township services/ amenities and facilities. • Additional LLRZ land is appropriately located to meet rural residential housing demand not currently met by the PWDP. • Greater supply / competition in the rural residential market will contribute to housing choice and affordability. • Reduced maintenance and improved traffic safety associated with the sealing of Ashworths Road. • Restoration and enhancement of natural features on the Site with potential benefit to biodiversity and cultural values. • Range of allotment sizes (2,500m² through to 10,000m²) providing increased rural residential diversity. • Provides a planning framework that enables a rural residential development outcome that maintains the amenity of adjoining rural residential, semi-rural and rural properties. | <ul style="list-style-type: none"> • Time and money cost to submitter for submission processes and technical reports. • Change to rural character and outlook as currently experienced by properties to the south (San Dona) and on the opposite side of Ashworths Road. • Loss of small area of 'identified highly productive land' (albeit the loss of productive farmland as a result of the Proposal will be minimal). • Economic cost of the development of the associated services and roading (for the landowner). • No cultural costs identified. |
|---|--|

<ul style="list-style-type: none"> • Construction-related jobs and associated economic activity. • Development certainty for the landowner, Council and community without further plan change and / or non-complying subdivision consent processes. 	
---	--

- 6 The costs of Option 1 outweigh the benefits, and the Proposal (Option 2) is the preferred option. The Proposal will significantly boost housing supply in the rural residential market, and LLRZ-enabled development of the Site will achieve a well-functioning urban environment as part of the established Mandeville settlement where boundary interface mitigation and servicing options can be appropriately delivered through the subdivision consent and detailed design processes. Overall, the Proposal is considered to be the most efficient and effective means of achieving the objectives of the PWDP.

Risk of Acting or Not Acting

- 7 A Section 32AA evaluation is required to assess the risks of acting or not acting if there is insufficient information about the subject matter of the provisions. The submission was supported by technical reports and further technical assessment and evidence has been prepared to confirm the suitability of the Proposal.
- 8 The technical evidence does not identify any fundamental risks of the Proposal and confirms the suitability of the Site for LLRZ-enabled development. This information has been provided at an appropriate level of detail for a rezoning request. Additional technical investigation and detailed engineering design in respect of ground conditions and servicing would be undertaken as part of the subsequent consenting and construction processes. This creates a risk associated with acting on the Proposal, however it is considered small given the resource consent process will require that the technical matters are appropriately assessed and designed as appropriate for the particular development outcome and in accordance with the ODP. The further assessment required to support the resource consent process will effectively manage this risk.

- 9 Risks associated with not acting include the Site being developed in accordance with the 20-lot subdivision consent. This will result in the lost opportunity to establish LLRZ on this Site in close proximity to Mandeville Village Centre, exacerbating the PWDP's failure to respond to the shortfall of rural residential land within the District. Not acting now would under cater for rural residential land use demand at Mandeville and in the wider District. This is likely to result in a continual increase of land and house prices and a consequential impact on housing affordability. This may result in Council not meeting its obligations under the NPS-UD.

Overall Assessment

- 10 In summary, the Proposal is considered to be the most appropriate approach, having had regard to matters of efficiency and effectiveness, to achieve the Objectives of the PWDP.
- 11 Option 2 is the most consistent with a range of PWDP policies, especially as it supports the strategic directions signalled in the PWDP and NPS-UD.
- 12 Option 2 is the most appropriate given:
- (a) the proposal adopts a PWDP zone and associated activity and built form standards. This ensures continuity of District Plan anticipated environmental outcomes for the LLRZ;
 - (b) the Site is close to the Mandeville Village Centre and community facilities;
 - (c) it will be consistent with, and give effect to, the relevant objectives and policies of the PWDP and NPS UD;
 - (d) it is a logical extension of the established rural residential settlement of Mandeville; and
 - (e) the proposed ODP provides certainty of the final form and disposition of LLRZ-enabled development of the Site and its integration with the surroundings.
- 13 The economic, social and environmental benefits of the Proposal outweigh the potential costs.
- 14 The Proposal is considered to be the most appropriate, efficient and effective means of achieving the purpose of the RMA.