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Tēnā koutou katoa

Christchurch City Council comments on the Proposed Waimakariri District Plan

Introduction

1. Christchurch City Council (the Council) thanks the Waimakariri District Council (WDC) for the opportunity to submit on the Proposed Waimakariri District Plan (the proposed Plan).

Overarching comment

2. The Council is generally supportive of the WDC's Proposed District Plan. Comments about specific topic areas are provided in the following sections.

3. The Council notes that the timing of WDC's District Plan Review brings some challenges, particularly due to the current planning context and state of flux. This context includes the **Resource Management Act reform** and the recently announced **Resource Management Enabling Housing Supply Amendment Bill**. The Council notes that the latter Amendment Bill will have implications for the WDC District Plan, with the extent of these to be determined at the time of writing.

4. The Council notes other work underway in the sector, which will have a bearing on the Waimakariri District Plan Review, including:
   - Development of the **Greater Christchurch Spatial Plan**
   - **Selwyn District Council's District Plan Review**
   - **Regional Land Transport Plan 2021-2031**
   - **National Policy Statement on Urban Development (NPS-UD)**.

5. The Council acknowledges the WDC's commitment to engaging with its strategic partners, including mana whenua, the other Greater Christchurch councils and central government, to ensure an integrated approach that takes account of the strategic context.

Provision for intensification

6. The Council notes that staff have previously provided feedback on the Draft Proposed Plan and that the subsequent proposed Plan addresses many of the issues that were raised, including provision for density of at least 15 households per hectare in new Residential Development Areas (or 12 households per hectare where there are constraints). We support the Subdivision Chapter – Policy SUB-P6 (2)(c).

7. The Council also notes that the proposed Plan's Strategic Objective SD-02 (2) refers to urban development that 'recognises existing character, amenity values, and is attractive and functional […]'. The Council supports the proposed wording as it recognises the changes that are likely to occur to the existing

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character with intensification, and reflects the direction provided by Policy 6 of the NPS-UD.

8. While technically outside of the scope of the proposed Plan, the Council notes that development covenants can limit intensification in some areas, and are contrary to wider intensification outcomes sought by the NPS-UD. The Council also notes that the development of community (social) housing and affordable housing types are also limited by covenants. The Greater Christchurch Partnership's Social and Affordable Housing Action Plan (which will implement actions of Our Space 2018-2048) is being designed to address deficits in social housing and Waimakariri District Council should consider actions arising through this as part of its wider planning programme.

Transport matters

9. The Council considers that the proposed Plan should better recognise the potential downstream effects of increased traffic, (particularly commuter traffic) on the wider region's transport system. We know that there is significant commuter traffic flow between Waimakariri District and Christchurch City and consider that the effects on the wider network should be taken into account. Data from the 2018 Census shows 8,460 individuals travelled from Waimakariri to work in Christchurch City by either private or company vehicle on census day.

10. Objectives TRAN-03 'Adverse effects from the transport system' and TRAN-04 'Effects of activities on the transport system' seek to avoid, remedy or mitigate adverse effects of providing for transportation needs of people and from activities on the 'District's transport system'. The Council supports the objectives in part but seeks the inclusion of either a new objective or an amendment to the objectives that acknowledges the inter-district flow of traffic and explicitly considers downstream effects of WDC's growth on the Christchurch City road network.

11. The Council also suggests a rewording of the 'New Activities' Policy TRAN-P4 (1) to make its meaning clearer. This could be achieved by, for example, changing it from: "New activities: 1. locate on or establish primary access to the classification of road within the District Plan road hierarchy best able to accommodate the level and type of traffic generated" to "New activities: 1. locate on or establish primary access to a road classified within the District Plan road hierarchy as best able to accommodate …".

Kāinga Nohoanga Zone

12. The Council commends the WDC for its inclusion of the new Kāinga Nohoanga Zones in the proposed Plan. The zone is largely consistent with the revised provisions for the Christchurch City Council's Papakāinga/Nohoanga zone (proposed in Plan Change 8). Both sets of changes will better enable mana whenua use and development of their Māori Reserves land.

Provision for urban activities in Development Areas in accordance with the RPS Greenfield Priority Areas

13. In the staff comments provided on the draft proposed Plan, the Council encouraged the WDC to wait until the Canterbury Regional Policy Statement (CRPS) had been amended before determining provisions for urban activities beyond the CRPS Greenfield Priority Areas.

14. The Council notes that in the intervening months, Change 1 to Chapter 6 of the CRPS has been approved and is now operative.[1] Map A of the CRPS has been updated to show the additional areas approved for future urban growth and development in Rangiora and Kaiapoi. The Council notes that its comments have been taken into account and that the proposed District Plan maps align with the updated Map A. The

[1] Refer Change 1, Chapter 6 of the RPS.

Council supports the extent of (future) Development Areas on the proposed Plan planning maps as it aligns with the Greenfield Priority Areas and Future Development Areas on the CRPS Map A.

Alignment with Greater Christchurch partners

15. The Council is concerned that the proposed Plan potentially enables development in Greater Christchurch areas in the Waimakariri District that are outside of the future growth areas described in the Future Development Strategy 'Our Space 2018-2048' (FDS) and the CRPS.

16. While the Strategic Objective SD-02 (1) and (4) directs that urban development and infrastructure is "consolidated and integrated with the urban environment" and that new residential activity is focused "within existing towns, and identified development areas in Rangiora and Kaiapoi", Policy UFD-P2 'Identification/location of new Residential Development Areas' is potentially inconsistent with SD-02.

17. In clause (2) Policy UFD-P2 seeks to avoid residential development unless it occurs in new Residential Development Areas identified in clause (1) or unless the new development areas "occur in a form that concentrates, or are attached to, an existing urban environment and promotes a coordinated pattern of development".

18. The Council opposes this policy as it potentially allows for new residential development outside of the identified Development Areas 'as-of-right'. Such development could not only be contrary to the FDS and the CRPS urban growth direction but also be inconsistent with the strategic direction in the proposed Plan's Objective SD-02. While Policy 8 of the NPS-UD refers to local authorities being responsive to proposals that would add significantly to development capacity, even if unanticipated or out-of-sequence, Council staff consider that it refers to plan changes rather than providing for such unanticipated development through the Plan policy framework.

19. A plan change application could rely on the NPS-UD for policy support while giving the Council the ability to assess the proposal on its merits and consistency with other Plan objectives and policies concerned with a coordinated approach to urban growth. It would also be assessed against the criteria identified in the NPS-UD Objectives 3 and 6 in terms of infrastructure provisions, transport connectivity and expected demand for housing (NPS UD Policies 2 and 7). The Council also recommends a review of the wording in UFD-P2 (2)(a) as the meaning of the term 'concentrates' is not clear.

20. Policies UFD-P5 and UFD-P8 provide for extensions to as well as new industrial areas, however, it is not clear if or how Policy UFD-P8 is linked to UFD-P5. UFD-P5 seeks that any such development implements the urban form identified in the FDS or Waimakariri District Development Strategy (WWDS). While the FDS provides a long-term strategic direction for urban growth in Greater Christchurch, which the district plan has to have regard to[2], the CRPS, including its Map A, is the higher order document that needs to be given effect to as required by s75(3) and s73(4) of the RMA. It is noted that there is no reference to the directions of the CRPS contained in Objectives 6.2.6 and 6.2.2, and related Policies 6.3.1, 6.3.11 and 6.3.12, or the requirement to direct industrial activities to the identified Greenfield priority areas for business within the Projected Infrastructure Boundary (PIB). Policy UFD-P8(2) refers to "development in greenfield areas", however, it is not clear whether these greenfield areas are constrained to the locations identified in the CRPS Map A and currently zoned as a general Development Area on the WDP planning maps. There is potential for requests to rezone to industrial those parts of Development Area that are meant to provide for residential growth even if there is still capacity in the existing industrial zones. Further, the WDDS referred to in Policy UFD-P5 indicates potential long-term business growth areas that go beyond the

[2] RMA, s74(2)(b)(i)

Existing Urban Area and the PIB shown on the CRPS Map A and on the FDS Figure 16. The Council recommends that Policies UFD-P5 and P8 be amended to resolve the issues identified.

21. Similar concerns are valid for Policy UFD-P7 'Mechanism to provide additional Commercial and Mixed Use Zones', which in (4) refers to "any development capacity shortfall as identified in the Future Development Strategy or WDDS". The recent update to Map A of the CRPS identifies extended future growth areas for the district and Policy UFD-P7 needs to give effect to the CRPS. This would mean constraining any future additions to commercial zoning in the proposed Plan to the Development Areas identified on the WDP planning maps (as per the CRPS Map A). As mentioned above, the WDDS indicates potential long-term business growth areas that go beyond the current CRPS Existing Urban Area, Greenfield Priority Areas – Business, Future Development Area and the PIB, therefore it should not be used as an indicator of potential commercial zoning extension areas.

22. The Council requests the Waimakariri District Council reconsiders provisions that would enable development outside of the current future growth areas for consistency with the current collaborative cross-agency planning framework in place to meet the reasonably foreseeable needs of land for future urban development in Greater Christchurch.

Use of highly productive land for urban, rural lifestyle and other activities

23. The Council is concerned that the proposed Plan does not sufficiently recognise the significance of highly productive land or provide direction on how rural lifestyle development activities are to be managed to recognise that significance, for example in respect of Large Lot Residential Zones. This omission means that in the case of a plan change proposal to rezone highly productive rural land to Large Lot Residential Zone, there would be no strategic direction or policy support to direct such a proposal away from highly productive land, or to prevent the fragmentation of such land and to decline the proposal. The smaller scale and highly modified nature of the lifestyle blocks may not lead to the most productive use of highly versatile soils.

24. The Rural Lifestyle Zone provisions rely on the land being used for 'primary production,' which may include, according to the definition, forestry or quarrying. The land may also be used for a rural industry. Such uses, however, may not represent the most appropriate way of managing highly productive land.

25. The Council suggests that reference to highly productive land and/or versatile soils is made more explicit in the proposed District Plan and that the list of permitted activities is reviewed in order to make the best use of that land and protect its highly productive characteristics. Amendments are, therefore, suggested to 'General Objectives and Policies for all Rural Zones' RURZ, 'Rural Lifestyle Zone' RLZ and 'Large Lot Residential Zone' LLRZ objectives, policies and rules to protect the highly productive land/versatile soils from fragmentation and unsuitable 'primary production' activities such as forestry or quarrying.

Commercial development

26. The Council supports provisions that require commercial activities in the Waimakariri District to support and maintain the hierarchy of the district's commercial centres, as well as the existing commercial centre within Belfast/Northwood in the Christchurch District. In particular Objective CMUZ-O2 and Policy CMUZ-P1 are supported.

Waimakariri River

27. The Council strongly supports provisions in the Proposed Plan relating to the Waimakariri River and its

margins, being one of the best examples of braided rivers and the associated indigenous flora and tidal river indigenous fauna habitats. The Council notes that in accordance with the National Planning Standards 2019, the Waimakariri River, and its margins, is listed within the following overlays and schedules in the Plan:

- Waimakariri River Outstanding Natural Feature (ONF) (NFL-APP1)
- Scheduled Natural Character Freshwater Bodies Schedule 1 (NC-SCHED1)
- Sites and Areas of Significance to Māori (SASM011, 13 and 22)
- ECO-SCHED2 (unmapped SNA) which applies to significant indigenous vegetation and/or fauna habitats in the Coastal and Plains Areas in the Low Plains ecological district, including the Waimakariri River. The relevant provisions apply to, among other things, vegetation providing habitat to indigenous fauna, herbfields/stonefields, uncultivated dryland soils, riverbanks and terraces.
- ECO-SCHED3 - Lists naturally uncommon ecosystem types including 'Braided riverbeds'. The applicable provisions do not allow indigenous vegetation clearance within 20 metres of the bank of a river or where it would compromise any species or habitats listed in ECO-SCHED3.

28. The Council supports the identification of the Waimakariri River as an Outstanding Natural Feature and notes that the maximum Gross Floor Area of an addition to building in the Outstanding Natural Feature is 100m^2 in any 10 year period. The river is also scheduled in the Scheduled Natural Character Freshwater Bodies Schedule 1 (NC-SCHED1) where the maximum Gross Floor Area of additions to buildings should not exceed 10m^2 in any 5 year period. The rules align with the Council's treatment of River in the Christchurch District Plan.

29. The Council believes that combined, the provisions will provide the same protection to the relevant ecological values of the Waimakariri River and its margins as listing the river as a Significant Natural Area would have, if that approach had been taken.

30. The Council looks forward to continuing to work with the Waimakariri District Council on matters relating to the Waimakariri River to ensure its ongoing protection.

Conclusion

31. The Christchurch City Council does wish to be heard in respect to matters raised in this submission.

32. Thank you for the opportunity to provide this submission. For any clarification on points within this submission please contact David Falconer, Team Leader, City Planning (David.Falconer@ccc.govt.nz).

Ngā mihi

Mayor Lianne Dalziel on behalf of the Christchurch City Council

From: Eplan
To: Development Planning Mailbox
Subject: FW: CCC Address for Service
Date: Monday, 30 May 2022 1:31:36 PM
Attachments: image002.png
image003.png
image004.png
image005.png
image006.png
image007.png
0.png
image008.jpg

From: Falconer, David <David.Falconer@ccc.govt.nz>
Sent: Thursday, 31 March 2022 12:06 PM
To: Eplan <eplan@wmk.govt.nz>

Subject: CCC Address for Service

Hi,
This is my last day working at CCC. Can the address for service for the CCC submission on the Waimakariri District Plan Review be changed to planchange@ccc.govt.nz

Ngā mihi
David

David Falconer
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