

Before an Independent Hearings Panel
Appointed by Waimakariri District Council

under: the Resource Management Act 1991

in the matter of: Submissions and further submissions on the Proposed
Waimakariri District Plan and Variation 1

and: Hearing Stream 12: Rezoning requests (larger scale)

and: **Crichton Developments Limited**
(Submitter 299)

Statement of evidence of Georgia Brown (Planning) on behalf of
Crichton Developments Limited in relation to Gladstone Road
rezoning request

Dated: 5 March 2024

Reference: J M Appleyard (jo.appleyard@chapmantripp.com)
A M Lee (annabelle.lee@chapmantripp.com)

chapmantripp.com
T +64 3 353 4130
F +64 4 472 7111

PO Box 2510
Christchurch 8140
New Zealand

Auckland
Wellington
Christchurch



STATEMENT OF EVIDENCE OF GEORGIA BROWN ON BEHALF OF CRICHTON DEVELOPMENTS LIMITED

INTRODUCTION

- 1 My full name is Georgia Ellen Brown. I am a senior planner practising with Novo Group Limited in Christchurch. Novo Group is a resource management planning and traffic engineering consulting company that provides resource management related advice to local authorities and private clients.
- 2 I hold the qualifications of a Bachelor of Planning (Hons) from the University of Auckland, attained in 2013. I am an intermediate member of the New Zealand Planning Institute. I have ten years of experience as a resource management planner, predominantly working on resource consents for various local authorities and as a consultant planner.
- 3 I have visited the site that is the subject of Crichton Developments Limited (*Crichton*) submission (Submitter 299), and the surrounding area, most recently on 8 February 2024.
- 4 Of note, the original submission on the proposed Waimakariri District Plan (*PDP*) was prepared by Inovo Projects Limited on behalf of Crichton. Novo Group was engaged by Crichton to prepare planning evidence in October 2023, and I have been involved since November 2023.

CODE OF CONDUCT

- 5 Although this is not an Environment Court hearing, I note that in preparing my evidence I have reviewed the Code of Conduct for Expert Witnesses contained in Part 9 of the Environment Court Practice Note 2023. I have complied with it in preparing my evidence. I confirm that the issues addressed in this statement of evidence are within my area of expertise, except where relying on the opinion or evidence of other witnesses. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

SCOPE OF EVIDENCE

- 6 I have been asked to comment on the relief sought by Crichton in relation to the PDP. Specifically, the request to rezone land at 145-167 Gladstone Road (*site*), Woodend to Large Lot Residential Zone (*LLRZ*) (*proposal*).
- 7 I have reviewed the further submissions database and it is my understanding that no further submissions have been lodged in relation to the proposal.
- 8 My evidence will address:

- 8.1 A summary of the proposal;
 - 8.2 A description of the site and surrounds;
 - 8.3 Statutory Framework and analysis;
 - 8.4 Assessment of Environmental Effects; and
 - 8.5 An Assessment of Part 2 of the Resource Management Act ('RMA').
- 9 In preparing my evidence, I have reviewed:
- 9.1 The submission lodged by Inovo Projects Limited on behalf of Crichton on 30 November 2021.
 - 9.2 The National Policy Statement Urban Development ('NPS: UD').
 - 9.3 The National Policy Statement on Highly Productive Soil ('NPS: HPL').
 - 9.4 The Canterbury Regional Policy Statement ('CRPS').
 - 9.5 The draft Greater Christchurch Spatial Plan ('dGCSP').
 - 9.6 The PDP;
 - 9.7 The Waimakariri District Rural Residential Strategy 2019 ('RRDS').
 - 9.8 The Waimakariri District Plan Review Memo to Rezoning Submitters (via hearing panel) dated 12 December 2023.
 - 9.9 Evidence of the following experts engaged by Crichton:
 - a. **Mr Wayne Gallot** – Transport;
 - b. **Mr Dave Compton-Moen** – Urban design and landscape;
 - c. **Mr Victor Mthamo** – Highly Productive Soils;
 - d. **Ms Nicola Peacock** – Contamination;
 - e. **Mr Jeremy Trevathan** – Acoustics;
 - f. **Ms Natalie Hampson** – Economics;
 - g. **Mr James Twiss** – Real estate; and
 - h. **Mr Tim McLeod** – Infrastructure and servicing.

SUMMARY OF EVIDENCE

- 10 In summary, taking into account the evidence of the various experts, I consider that the adverse effects of the requested rezoning of the land at 145-167 Gladstone Road, Woodend to LLRZ can or will be avoided, remedied or mitigated to an acceptable standard.
- 11 In particular, I note the following points:
- 11.1 The site is suitable for redevelopment based on the geotechnical investigation, and potential effects associated with contamination from the former rural use can be managed such that they will be acceptable.
 - 11.2 The site can be serviced through extensions of existing infrastructure in the immediate environment; additionally, there is anticipated to be sufficient capacity within the network to cater for the development.
 - 11.3 The acoustic effects associated with the proposal can be mitigated through the construction of a bund along the eastern boundary of the site.
 - 11.4 The landscape and visual amenity effects can be mitigated through the construction of a landscaped buffer along the eastern boundary of the site.
 - 11.5 The traffic related effects of the proposal and associated increase in traffic generation will have acceptable effects on the safety and efficiency of the wider transport network.
 - 11.6 The loss of land for rural productive purposes will have a negligible effect in the context of Waimakariri district and the Canterbury region.
 - 11.7 The site is in an efficient location to provide for LLRZ and assist in providing feasible development capacity to help meet the share of medium-term demand in Woodend and the district as a whole.
 - 11.8 The rules for the LLRZ are appropriate as proposed in the PDP, subject to the insertion of the Outline Development Plan (*ODP*) as an 'existing development area' within the PDP.
- 12 Given the above, I also consider that the proposal will give effect to and achieve consistency with the relevant planning framework, including the relevant higher order documents and the PDP objectives. I acknowledge the proposal is not consistent with a

policy in the CRPS relating to rural residential development, albeit I consider it finds support in other policies of the CRPS.

- 13 Overall, I consider, the requested rezoning of the land from RLZ to LLRZ is the most appropriate, efficient and effective means of achieving the purpose of the RMA.
- 14 On the basis of the views expressed above, I consider that the submission / rezoning request should be accepted.

SITE DESCRIPTION AND SUBMISSION

Site and Surrounding Environment

- 15 The site is legally described as Lot 1 DP 29099 and Lot 2 DP 29099 being 22.72 hectares in area.
- 16 The site is located on the southern side of Gladstone Road at the eastern side of the Woodend township. The surrounding land comprises a mixture of Rural, Residential 4a and Residential 2 zones under the Operative District Plan.
- 17 The site is essentially flat and rural in character. An existing residential dwelling is located on 145 Gladstone Road, with the remainder of the site vacant and used for grazing. A shelterbelt is located in a central position on the site running north to south. **Figure 1** below shows the site.



Figure 1: Site location and surrounding zoning

- 18 The wider area is characterised by rural allotments to the north, east and south. To the south-west is an existing Residential 4a zone (*'Copper Beech'*), with Residential 2 zone further east of that.
- 19 The eastern portion of the site is affected by a designation (D058A) held by New Zealand Transport Authority Waka Kotahi (*'NZTA'*) for the Woodend Bypass (*'NZTA designation'*). The NZTA designation is proposed to be 'rolled over' into the PDP.
- 20 Gladstone Park is located to the north-east of the site on the adjacent side of Gladstone Road. An informal cycleway is currently located on the southern side of Gladstone Road running west-east and providing connectivity from Woodend, past the site and north towards Pegasus township.
- 21 Under the PDP, the land to the immediate west (129 Gladstone Road) and the land to the north, east and south of the site is proposed to be zoned Rural Lifestyle Zone (*'RLZ'*). The existing Res4a Zone to the south-west is proposed to be zoned LLRZ.
- 22 The eastern part of the site is located within a 'non-urban flood assessment overlay' of the PDP. It is noted that this is the part of the site that the NZTA designation covers. **Mr McLeod** covers flood hazards in further detail within his evidence, which I discuss later within this statement.
- 23 A stormwater network drain traverses north-south through a central part of the site. This is defined an 'unscheduled waterway in the PDP, with rules controlling the extent of development that can occur within the vicinity of this waterway.
- 24 The site is located outside of the Christchurch International Airport Noise Contour overlay.
- Description of the Submission / Proposal**
- 25 The proposal requests that the Council rezone the site from RLZ to LLRZ. The proposal is considered both appropriate and necessary to achieve sustainable growth and to meet anticipated residential development capacity within the locality of Woodend.
- 26 The site is a logical extension of the existing Copper Beach Res4a (proposed LLRZ) to the south-west of the site and will continue to achieve an efficient urban form with good connectivity. Noting the barrier which would be provided via the NZTA Bypass along the eastern part of the site, a clear demarcation would be provided between the 'urban' and 'rural' environment.
- 27 The site is located outside of the Projected Infrastructure Boundary (*'PIB'*) of the CRPS (Map A) and does not adjoin the edge of Woodend township. The site is not within the Large Lot Residential Zone Overlay (*'LLRZO'*) of the PDP and was not listed as an area suitable for future rural residential development within the RRDS.

require compliance with the acoustic and visual mitigation – I refer to **Appendix 2** to illustrate.

- 33 The proposed LLRZ objectives, policies and rules in the PDP are considered suitable for the rezoning. No changes are requested as part of this proposal. The only changes sought are as set out above.

STATUTORY FRAMEWORK

Resource Management Act 1991

- 34 The RMA is the legislative framework that defines the requirements for submissions to District Plan reviews.
- 35 Schedule 1 provides for the circumstances and requirements of preparation, change, and review of policy statements and plans. Clause 22 of Schedule 1 provides the requirements for changes to District Plans.
- 36 Sections 74 and 75 set out the matters which must be considered by a territorial authority when preparing a District Plan. This includes:
- Its functions under section 31;
 - The provisions of Part 2;
 - A direction given under section 25A;
 - Its obligations to prepare an evaluation report in accordance with section 32;
 - Any National Policy Statement, a Coastal Policy Statement and a National Planning Standard; and
 - Any regulations.
- 37 In addition, territorial authorities must also have regard to:
- Any proposed regional policy statement, or proposed regional plan;
 - Any management plans or strategies prepared under other Acts; and
 - Any management plans or strategies including iwi management plans.
- 38 Section 31 sets out the Council functions for giving effect to the RMA.

- 39 Section 32 sets out the procedure to evaluate the appropriateness of the proposed provisions including objectives, policies, rules and other methods. An evaluation of the proposal under section 32AA is attached as **Appendix 3**.
- 40 The submission seeking rezoning from RLZ to LLRZ has been prepared in accordance with the relevant requirements of the RMA as set out above, including:
- The reason for the request;
 - The requirement to have regard to the NPS:UD and the NPS: HPL;
 - The requirement to have regard to the CRPS;
 - The requirement to take into account any relevant planning document recognised by Te Runanga o Ngai Tahu lodged with the Council;
 - The PDP, and in particular the Strategic Directions and Urban Form and Development; and
 - An Assessment of Environmental Effects ('AEE').

National Policy Statement Urban Development 2022

- 41 The NPS: UD applies to this proposal as it is directed to Tier 1 urban environments², which includes the Waimakariri District as a Tier 1 local authority of Christchurch.
- 42 The NPS: UD sets the direction for growth and development within the country with an overall objective³ of achieving a well-functioning urban environment that enables all people and communities to provide for their social, economic and cultural wellbeing now and into the future.
- 43 The NPS: UD requires local authorities to provide at least sufficient development capacity to meet the expected demand for housing over the short, medium and long term.⁴
- 44 Planning decisions on urban development are required to be responsive to proposals, including plan changes that are proposing significant development capacity.⁵ This responsiveness is required even if the development capacity is unanticipated by RMA planning

² Clause 1.3.

³ Objective 1

⁴ Policy 2.

⁵ Policy 8.

documents (such as the CRPS) or out of sequence with planned land release.

- 45 In turn, the requirement to provide sufficient development capacity and to be responsive to proposals that add significant capacity is considered to assist in supporting competitive land and development markets, which is another objective of the NPS: UD.⁶
- 46 The NPS: UD has immediate effect and is a higher order document, such that it must be considered above lower order documents which may be outdated and, where there is conflict, that must be reconciled so as to not undermine the NPS: UD. This includes Regional and District Plans.
- 47 An assessment of the proposal against the relevant objectives and policies of the NPS: UD is set out in **Appendix 4**. In summary the rezoning is considered consistent with the objectives and policies of the NPS: UD as it will:
- 47.1 promote a well-functioning urban environment for people and communities to provide for their needs and already adjoins existing large lot residential development;
 - 47.2 add significantly to development capacity as required by Policy 8; and
 - 47.3 provide for an increase in housing variety, through an increase in supply of large lot residential land in an efficient location for this type of product.

National Policy Statement for Highly Productive Land

- 48 As a result of the timing of the gazettal of the NPS: HPL and the notification of the PDP, the provisions of the NPS: HPL do not apply to land that is identified as RLZ.⁷ Therefore, the NPS: HPL does not apply to the site as it is proposed to be zoned RLZ. The Reporting Officer of the s42a report for the Rural Chapter addressed this issue and also confirmed that the NPS: HPL was not applicable to the RLZ. Therefore, no further assessment of the NPS: HPL is required.
- 49 For completeness, noting that part of the site otherwise contains Land Use Class ('LUC') 2 Soils, an assessment of productive soils has been undertaken with evidence provided by **Mr Mthamo**. This is addressed later within this evidence.

National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health

⁶ Objective 2

⁷ Per clause 3.5(7) of the NPS: HPL

- 50 The National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health has been addressed through the PSI attached as part of **Ms Peacock's** evidence and discussed further within the body of this evidence.

Canterbury Regional Policy Statement

- 51 The CRPS is of relevance to this proposal being the document which the PDP must give effect to. Section 75(3)(c) of the RMA requires District Plans to give effect to regional policy statements.
- 52 The CRPS sets out the objectives, policies and methods to address resource management issues in the Canterbury region. An assessment of these key objectives and policies is set out in **Appendix 4**.
- 53 The CRPS has been updated multiple times since it became operative. Chapter 6 was inserted into the CRPS in 2013 as directed by the Minister for Canterbury Earthquake Recovery in the Land Use Recovery Plan to provide a framework for the recovery of Greater Christchurch. The site is located within the Greater Christchurch urban area and is shown on Map A (as amended by Change 1 to CRPS). However it is not identified as an 'existing urban area' and is outside the PIB.
- 54 In 2021 Change 1 to Chapter 6 of the CRPS was approved. This change identified future urban housing development areas in Rolleston, Rangiora and Kaiapoi on Map A. This change supported the actions of the 'Our Space 2018 – 2048 Greater Christchurch Settlement Pattern Update'.
- 55 In 2022 the CRPS was again updated to give effect to the NPS: UD and the requirement to include housing bottom lines per Clause 3.5 of the NPS: UD. The housing bottom lines represent the amount of development capacity required in the region for the next 10 – 30 years, inclusive of the 20% development margin.⁸
- 56 The CRPS has not otherwise been updated to give effect to and align with the NPS: UD, however it is recognised that a review of the CRPS is due to commence towards the end of 2024.
- 57 Key to this proposal is *Policy 6.3.9 Rural residential development* stipulating that any new rural residential development within Greater Christchurch can only be provided where it is in accordance with a rural residential strategy and zoned for such development. The site was not identified within the RRDS⁹ and consequently is not consistent with this policy.

⁸ The 20% development margin is required per Clause 3.22 of the NPS: UD

⁹ https://www.waimakariri.govt.nz/_data/assets/pdf_file/0035/69686/Rural-Residential-Development-Strategy.pdf

- 58 Notwithstanding the inconsistency with policy 6.3.9, as mentioned earlier, where there is conflict with a lower order planning document, that inconsistency is required to be reconciled by reading the earlier lower order document (CRPS) together with the later higher order document (NPS: UD) in a way that does not undermine the NPS: UD. The proposal is considered to provide for a well-functioning urban environment as required by the NPS: UD¹⁰ and the ODP demonstrates how the site can be developed and contribute to a compact and consolidated urban form.

The Draft Greater Christchurch Spatial Plan

- 59 The draft Greater Christchurch Spatial Plan (*dGCSP*) sets the direction for growth in Greater Christchurch. The *dGCSP* is a requirement of the NPS: UD, which requires Greater Christchurch Councils to jointly prepare a Future Development Strategy (*FDS*).
- 60 The *dGCSP* was released for public consultation in June 2023, with hearings held in October and November 2023. Following the completion of the hearings, the Hearings Panel provided their recommendation report in January 2024.
- 61 The *dGCSP* is still draft, noting that it needs to be adopted by the Partner Councils. It is understood that Waimakariri District Council are meeting on Tuesday 5 March 2024 to decide whether to adopt the *dGCSP*.
- 62 The *dGCSP* includes six overarching opportunities, which relate to the future growth of Greater Christchurch.¹¹ Each opportunity is supported by a number of different directions as to how it can be achieved.
- 63 Of relevance to the proposal is opportunity 4 which is to "*enable diverse and affordable housing in locations that support thriving neighbourhoods that provide for people's day to day needs*". This is to be achieved via a number of directions, inclusive of direction 4.2 which is to "*ensure sufficient development capacity is provided or planned for to meet demand*". As discussed further within this statement, and within the economic evidence of **Ms Hampson**, the proposal is considered appropriate as it assists with ensuring sufficient development capacity will be provided to meet demand.
- 64 Map 14 of the *dGCSP* then sets out the broad locations for housing and business growth in the Greater Christchurch area. The site is not shown as being within a future urban development area.

¹⁰ NPS: UD Policy 1

¹¹ The opportunities include: to protect historic heritage and areas of significance to Māori, to reduce and manage risks associated with natural hazards and climate change, to protect and restore the natural environment, to enable diverse and affordable housing, to provide space for businesses/the economy to prosper, and to prioritise sustainable transport choices,

- 65 Because the dGCSP is still 'draft' and is a non-statutory document, limited weight is given to it at this time. However, it is acknowledged that it is the document which gives effect to the NPS: UD requirement of a FDS and will inform the review of the CRPS at the end of 2024.

Rural Residential Development Strategy 2019

- 66 The RRDS was developed by Waimakariri District Council to provide direction on future rural residential development in the District. The strategy analysed demand for rural residential housing as well as vacant capacity of the existing operative Residential 4A and 4B zones to meet the demand. **Ms Hampson** discusses the relative demand and capacity calculations within her evidence.
- 67 The RRDS identified new rural residential areas for development, with the locations informed by key environmental, social and infrastructure constraints and opportunities at a District level. Locations were then shortlisted against another set of considerations, and were excluded if they were:
- a) Within high flood hazard areas.
 - b) Within undeveloped areas inside of the existing PIB of the District's main eastern towns.
 - c) On the direct edges of main towns outside of the Infrastructure Boundary thereby foreclosing more intensive long-term urban development.
 - d) Not connected to existing rural residential nodes or small settlements.
 - e) Not able to economically connect to the network scheme for wastewater.
 - f) Within the Christchurch International Airport noise contour.
 - g) Within areas that would compromise the operational capacity of the Rangiora Airfield.
- 68 An assessment of the proposal is made against the above criteria, set out in **Appendix 4**, demonstrating that the proposed location can comply with all of these requirements and therefore, in the context of the assessment of the RRDS, could be an appropriate location for rural residential development.
- 69 As mentioned above, the RRDS does not identify Woodend, nor the site, as an area of the Waimakariri District for future rural residential growth. Instead, the RRDS identified four localities within the District, being Waikuku, Ashley, Swannanoa and Oxford. These localities have been identified in the PDP through the LLRZO.

- 70 The implications of the RRDS and how that has informed the PDP, in particular the extent of proposed LLR zoning as well as the capacity/sufficiency of residential land, is discussed further within the body of my evidence.

Proposed Waimakariri District Plan

- 71 The PDP was publicly notified on 18 September 2021, with Variation 1 (housing intensification) and Variation 2 (financial contributions) notified on 5 November 2022. The objectives and policies in the proposed plan of relevance to the proposal are assessed in **Appendix 4**.
- 72 Based on the assessment of the objectives and policies, as notified, the proposal to rezone the site from RLZ to LLRZ is consistent with the relevant objectives and policies under the strategic directions, urban form and development, subdivision and residential chapters.
- 73 It is recognised that, since notified, changes have arisen to some of the objectives and policies as the various hearing streams have progressed. With respect to UFD-P3 (hearing stream 1 and 2), I acknowledge that the Canterbury Regional Council ('CRC') have lodged evidence that considers UFD-P3 does not give effect to the CRPS and would enable large lot residential outside of the areas defined in the RRDS, therefore resulting in inconsistencies with Policy 6.3.9. In response to this, the Council officer in his s42a report confirmed it was his opinion that *"the proposed provisions in UFD-P3 are suitable to ensure that any site used for large lot residential development is suitable."*¹² Following the hearing, the Council s42a officer, in his right of reply,¹³ stated that the policy provides for LLR within and outside of the Map A area of the CRPS and he does not accept the changes requested by the CRC.
- 74 During Hearing Stream 6, which covered the Rural Zone, another discussion was held with respect to highly productive land as it related to the wording of UFD-P3. The Council officer, Mr Mark Buckley, in his s42a report recommended an amendment of UFD-P3(5) to include point f. which would require that new LLR development be located so that it avoids the loss of LUC class 1 to 3 soils.¹⁴
- 75 As no decisions have been made on the Urban Form and Development provisions, there is still uncertainty as to their final wording. The notified provisions are therefore relied upon for this evidence. I consider that the proposal and provision of the ODP to

¹² Paragraph 149 of Council s42a Report – Urban Form and Development – Mark Buckley on behalf of Waimakariri District Council, date: 5 April 2023

¹³ Council reply on Urban Form and Development – planner Mark Buckley on behalf of Waimakariri District Council, date: 16 June 2023.

¹⁴ Paragraph 943 of Rural Zones Section 42A Report – planner Mark Buckley on behalf of Waimakariri District Council, date 8 September 2023

be the most appropriate option to achieve the policy direction of the PDP, as notified.

ASSESSMENT OF ACTUAL AND POTENTIAL EFFECTS ON THE ENVIRONMENT

- 76 The following AEE has been prepared in accordance with the Fourth Schedule of the RMA. The First Schedule, clause 22(2) of the RMA requires *'where environmental effects are anticipated, the request shall describe those effects, taking into account the provisions of Schedule 4, in such detail as corresponds with the scale and significance of the actual and potential environmental effects anticipated from the implementation of the change, policy statement, or plan'*.
- 77 The following actual and potential effects have been considered as part of the submission to rezone the site from RLZ to LLRZ:
- Transport;
 - Urban design / landscape;
 - Cultural Values;
 - Highly Productive Soils;
 - Contamination;
 - Geotechnical;
 - Noise (including reverse sensitivity);
 - Economic;
 - Infrastructure / servicing; and
 - Positive effects.

Transport

- 78 The transport related effects of the proposed rezoning have been addressed by **Mr Gallot** in his evidence.
- 79 Mr Gallot considers that:
- 79.1 The proposal is estimated to yield a development potential for 28 dwellings on the site (including the existing), with a corresponding generation of 230 vehicle trips per day, and 25 during the peak hour.
- 79.2 A simple T-junction intersection can be accommodated at the Gladstone Road boundary of the site. There is sufficient space

such that this could operate efficiently and safely without the need for auxiliary lanes and design features.

79.3 The traffic volumes generated from the development can be accommodated within the surrounding local road network, specifically *"while SH1 Main North Road appears to be already operating at or above capacity during peak periods, the volume of additional site-generated traffic on SH1 Main North Road and at the Gladstone Road intersection is estimated to be only around 1% of existing peak hour volumes and therefore likely to be within daily fluctuations of those peak volumes"*.¹⁵

79.4 Further to the above, Mr Gallot comments that if the NZTA designation project proceeds (and expected traffic volumes of Main North Road are realised), it is anticipated that the additional site generated traffic could be comfortably accommodated.

79.5 He notes *"whilst there are likely to be significant delays experienced by road users turning right out of Gladstone Road onto SH1 Main North Road at present, the adopted distribution of site-generated traffic suggests that only 2-4 vehicles per peak hour will be undertaking that manoeuvre. For those familiar with the area and traffic conditions, it is also noted that there are some alternate route choices available that could enable the right turn manoeuvre to be avoided"*.¹⁶

79.6 Lastly Mr Gallot considers that, in addition to the pedestrian and cycle links provided within the ODP, the site is reasonably well located to support active and sustainable transport modes.

80 I rely upon the expert advice provided by Mr Gallot and consider that the proposal will not have unacceptable traffic effects.

Urban design / landscape

81 **Mr Compton-Moen** has assessed the urban design and landscape effects of the proposed rezoning in his evidence. Mr Compton-Moen has also prepared an ODP for the site (**Appendix 1**).

82 Mr Compton-Moen makes the following conclusions:

82.1 The site is well connected and close to existing amenities which would allow the site to become a well-functioning urban

¹⁵ Paragraph 14 of Mr Gallot's evidence

¹⁶ Paragraph 15 of Mr Gallot's evidence

environment whilst still retaining a semi-open and spacious character.

82.2 Mitigation measures set out at paragraphs 33.1 – 33.4 will ensure the rezoning results in a low-moderate magnitude of change on the existing rural lifestyle character and values.

82.3 The adjacent RL and LLR properties will experience a change in openness of views across the property. Notwithstanding, the change in views experienced by these residents is considered to be low given the character of the existing environment and ability to retain and create a high amenity environment within the site.

83 I accept and rely upon Mr Compton-Moen's assessment and consider that the proposal will not have unacceptable effects on the surrounding rural environment.

Cultural values

84 With respect to cultural values, it is acknowledged that the site is within the Ngā Tūranga Tupuna overlay of the PDP. Effects on cultural values associated with future land disturbance and earthworks will be controlled through the PDP provisions.

85 Per the evidence of **Mr McLeod**, stormwater can be appropriately managed, as discussed below. In addition, **Mr Compton-Moen** recommends planting the visual buffer with indigenous species, which is adopted as part of the ODP requirements.

86 Overall, it is considered the proposal can appropriately manage cultural values.

Highly Productive Soils

87 **Mr Mthamo** has assessed the effects of the proposal on highly productive soils in his evidence.

88 Noting that the NPS: HPL does not apply to the site, the below assessment of Mr Mthamo's evidence considers the loss of productive soils in a general sense as a result of the rezoning.

89 Under the CRPS, land which contains LUC 1 – 2 soils is considered to be versatile and highly productive. The site contains 9.48 ha of LUC 1 soil. The directions of the CRPS focus on avoiding, remedying or mitigating the adverse effects of development on the productivity or productive capacity of soils and their ability to support primary production.¹⁷

¹⁷ Paragraph 12 of Mr Mthamo's evidence.

- 90 In this situation, the proposal will result in the loss of this primary productive purpose. However, in Mr Mthamo's opinion this loss will be negligible in the context of both the Waimakariri district and the Canterbury region, for the following reasons:
- 90.1 There are variabilities in the nature and extent of soils across the site which affects the management of land for productivity;
- 90.2 The application of nutrients to the site would be essential to support land-based primary production. However, Mr Mtham considers the strict nutrient limits in the Canterbury Land and Water Regional Plan ('CLWRP') would constraint the use of nutrients on the site;
- 90.3 The site would represent a reduction in total regional and district productive or versatile soils of 0.003% and 0.002% respectively.
- 91 Based upon the above, I adopt and rely upon Mr Mthamo's expert evidence and consider the loss of productive soil as a result of the proposal would not be unacceptable.

Contamination

- 92 **Ms Peacock** has assessed the effects of soil contamination risk of the proposal in her evidence.
- 93 To determine whether there was any risk of soil contamination that would warrant further investigations, and whether the National Environmental Standards for Contaminated Soil ('NES: CS') would apply, Ms. Peacock undertook a PSI. Ms. Peacock identified a number of Hazardous Activities and Industries List ('HAIL') activities on some parts of the site, as outlined in paragraph 12 of her evidence.
- 94 Given the evidence that these activities have previously occurred on the site, the NES:CS is applicable, and resource consent may be required for future change of use, subdivision and soil disturbance of the site.
- 95 Based on Ms Peacock's evidence, it is understood that the identified HAIL activities will not preclude the proposal and can be managed through further testing and remediation as required, the detail of which can be completed as the site is developed.
- 96 I accept and rely upon Ms Peacock's evidence. It is therefore my opinion that the contaminated land effects of the proposal can be mitigated and are acceptable.

Geotechnical

- 97 **Mr Thompson** has provided evidence on potential geotechnical constraints to the proposal. Mr Thompson has relied upon the geotechnical assessment prepared for the site and attached as Appendix 1 to his evidence.
- 98 Mr Thompson is of the opinion that the proposed rezoning is considered low risk from a geotechnical perspective "*due to the dense underlying sand and gravel deposits and the ability to design future structures to cope with the seismic and static settlement demands*".¹⁸
- 99 I rely upon the expert advice of Mr Thompson and on this basis consider that the proposal is appropriate from a geotechnical perspective. Any potential effects can be appropriately mitigated and managed such that they are acceptable.

Acoustics

- 100 **Mr Trevathan** has assessed noise effects related to the proposed rezoning in his evidence. In particular, he has considered the potential noise and reverse sensitivity effects arising from the designation located along the eastern portion of the site.
- 101 As indicated by Mr Trevathan, the design of this future road is still not developed and there are a range of factors that would affect the resultant noise levels emitted. Mr Trevathan has developed noise modelling based on a number of assumptions set out in paragraph 6.2 of his evidence.
- 102 The modelling, as depicted in **Figure 3** below, has indicated that, with no mitigation in place, the site would receive noise levels ranging from 52dB LAeq(24h) at the western most end of the site, to 65dB LAeq(24h) at the edge of the NZTA designation.

¹⁸ Paragraph 9 of Mr Thompson's evidence

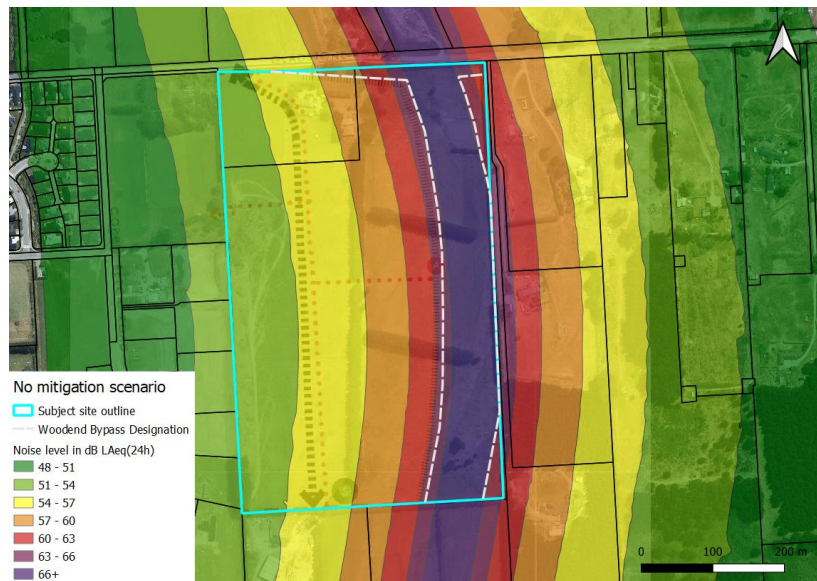


Figure 3: Noise modelling with no mitigation

- 103 Based on the results of this modelling, Mr Trevathan recommended physical mitigation in the form of a three-metre-high acoustic barrier along the western extent of the NZTA designation. This barrier has been included within the ODP for the site, noting that it correlates with the necessary visual mitigation discussed later in this evidence.
- 104 With the inclusion of the above mitigation, the subject site is anticipated to receive noise levels ranging from 51dB LAeq(24h) at the western most part of the site, to 56dB LAeq(24h) at the edge of the NZTA designation or the acoustic barrier at 1.5m above ground level. This is depicted in **Figure 4** below.

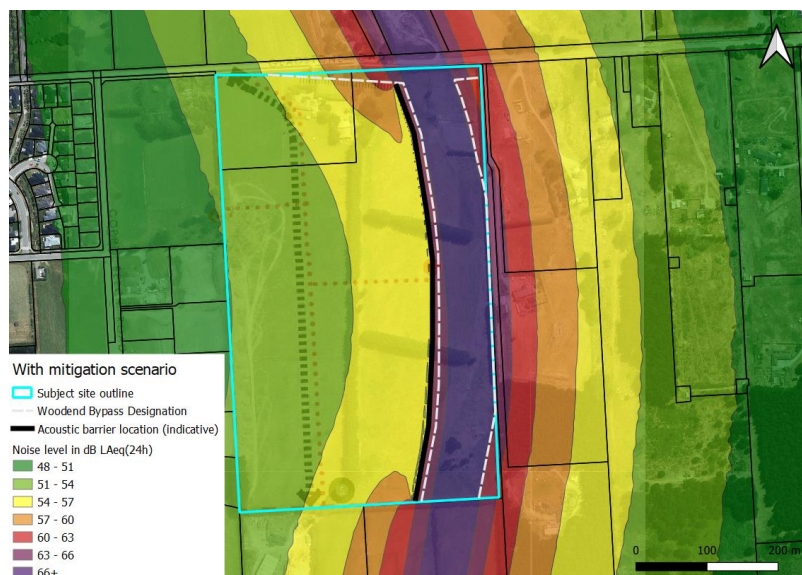


Figure 4: Indicative noise modelling with mitigation included via an acoustic barrier (black line)

- 105 Taking the above into account Mr Trevathan considers the key points to consider include noise within internal habitable spaces of dwellings, noise in outdoor living spaces associated with dwellings and road traffic vibration.
- 106 With respect to noise within internal habitable spaces of dwellings Mr Trevathan considers the sound insulation requirement of the PDP, as refined via a Joint Witness Statement¹⁹, to be appropriate to control internal noise levels within future dwellings. I accept his expert advice on this matter and concur that the rule as proposed would sufficiently manage noise within internal spaces.
- 107 Turning to the potential effects of noise within outdoor living spaces associated with dwellings, the PDP does not seek to provide any specific protection to these spaces in other locations. Notwithstanding that, Mr Trevathan has addressed this issue within his evidence and considers that the current indicative modelled noise levels across the subject site are within the range that would typically be considered acceptable for residential outdoor living spaces within vicinity of roads. I accept and rely upon Mr Trevathan's expert advice.
- 108 Additionally, with the RL zoning currently proposed in the PDP, dwellings and their outdoor living spaces could be constructed on the site with no acoustic mitigation in place²⁰, and experience higher noise levels than what may otherwise result from the rezoning sought with mitigation in place. Whilst it is accepted that the proposal would result in a higher density of residential occupation of the site, and thus more people being exposed to a potential noise effect, it is Mr Trevathan's expert opinion that these external noise levels are within a range where this would not be a determinative factor about whether the site is suitable for a higher density of development. I accept and rely upon Mr Trevathan's expert advice and, noting that the PDP does not seek to protect outdoor living spaces, I consider the potential effects in this situation will be acceptable. I note that, with mitigation in place, the proposal is not likely to give rise to complaints about noise and therefore will not lead to reverse sensitivity effects.
- 109 Lastly, in terms of vibration effects, Mr Trevathan considers that based on previous experience and NZTA guidance, vibration limits from land-based transport can be readily achieved if a dwelling is at least 15 – 20 metres from the road surface in question. Given the site, location of designation and proposed visual / acoustic buffer Mr Trevathan considers it is unlikely that vibration effects will be an issue. I accept Mr Trevathan's expert advice.

¹⁹ Camp, S., Chiles, S., Styles, J. 'Joint Witness Statement – NOISE-R16' In the matter of the Proposed Waimakariri District Plan. 24 October 2023.

²⁰ In the form of an acoustic bund or barrier, it is accepted that the dwellings would still need to meet the internal acoustic insulation requirements.

- 110 Based on the above discussion it is considered that, with suitable mitigation as proposed on the ODP, any potential adverse noise effects associated with the proposal will be acceptable.

Economics

- 111 **Ms Hampson** has provided detailed evidence on the proposal. Her evidence considers sufficiency for the total housing market by location; she then considers demand, capacity and sufficiency for the rural residential market, being a subset of the total residential market. The effects are assessed in the context of the key objectives of the NPS: UD, in particular objective 2, policy 2 and policy 8.
- 112 Acknowledging the detail of Ms Hampson's evidence, it is clear that there is a lengthy and at times complex history of housing capacity models which have been prepared in order to inform the PDP. For the purposes of this assessment, I will not repeat the detail of Ms Hampson's evidence as it relates to the models and analysis undertaken to date. Instead, I have summarised her key points as they relate to the NPS: UD and the planning merits of the proposal.
- 113 In relation to housing capacity across the Waimakariri District as a whole, the following points are made:
- When considering the housing capacity and the robust and frequent information Council is required to uphold²¹, Ms Hampson has turned her mind to the key discussions arising as part of the hearing for PC31 (Ohoka) to the operative Waimakariri District Plan. During this process she notes that the information provided by Inovo Projects (for the applicant) demonstrated a potential shortfall of 609 dwellings in the main urban townships of the district. This differed to the total urban surplus of 964 dwellings estimated by Formative, on behalf of the Council, in the Waimakariri Capacity for Growth Model 2022 ('WCGM').
 - Ms Hampson notes the Independent Hearings Panel Decision for PC31 accepted the evidence of the applicant as it related to capacity and supply, and strongly recommended that the Council review the analysis provided by Formative. Ms Hampson has accepted and relied upon the Inovo Project assessment over the Formative.
- 114 Taking the above into account, Ms Hampson comments that Inovo's assessment of medium-term capacity demonstrates a shortfall of 1,080 dwellings in the Woodend/Pegasus locality. This differs to the estimate made by Formative who state that there is only a shortfall

²¹ NPS: UD Objective 7: Local authorities have robust and frequently updated information about their urban environments and use it to inform planning decisions.

of 284 dwellings. Table 2 of Ms Hampson's evidence summarises the WCGM medium-term capacity results v Inovo Project's results.

- 115 I accept and rely upon Ms Hampson's evidence here, which demonstrates that there is a shortfall in medium-term capacity across the urban area²² of the Waimakariri district, and within the locality of Woodend/Pegasus. The proposal will therefore assist in helping to fulfil some of this shortfall.
- 116 Ms Hampson also considers demand, capacity, and sufficiency of the rural residential housing market, noting this is a subset of the total housing market. She considers this in the context of the RRDS which, as noted above, is the document that informed the zoning of LLRZ (rural residential) in the PDP.
- 117 As mentioned earlier, the RRDS was prepared in 2019 (based on a 2018 snapshot), prior to the implementation of the NPS: UD. The RRDS projected a medium-term growth rate of 38.5 dwellings/annum, being approximately 385 over the medium-term (10-year period). However, the NPS: UD requires an additional 20% margin to be added to medium-term growth.
- 118 In response to this, Ms Hampson notes at paragraph 42 of her evidence that *"while not all rural residential areas are within the urban environment of the district or part of one of the main urban townships (most are), including the intent of the margin district-wide would mean that the demand that needs to be planned for is 462 additional dwellings to ensure at least sufficient rural residential capacity is provided for in the District Plan"*.
- 119 When a competitiveness margin is included, there is an indicative shortfall of rural residential land by 2024, and she notes that from 2025 there is a noticeable shortfall. The Council has not addressed this projected medium-term shortfall, as no LLRZ was proposed in the PDP. Instead, those areas identified in the RRDS were notified as an overlay / future development area in the PDP. Furthermore, 'live' zoning of additional LLRZ was not identified as an option in the Council's S32A report for the Rural or Residential Zone. Relying upon Ms Hampson's expert advice, there is a need for additional LLRZ land to meet this shortfall. The proposal will provide for this.
- 120 Lastly, Ms Hampson has reviewed the WCGM. Based on Ms Hampson's analysis, and when applying a competitiveness margin, she confirms that *"additional land needs to be zoned LLRZ (in appropriate locations of demand) in order to meet projected medium-term demand and avoid constraining the rural residential housing market"*.²³

²² Urban area being the three main urban areas of Rangiora, Kaiapoi and Woodend/Pegasus.

²³ Paragraph 64 of Ms Hampson's evidence

- 121 As mentioned, the PDP has not notified any additional live LLRZ, instead only LLRZO. Rezoning requests cover 100% of the notified LLRZO, with all areas requested to be live zoned LLRZ with the exception of submission #214 which seeks to rezone the notified LLRZO to a higher residential activity²⁴ The live zoning of the LLRZO fulfils the intent of the RRDS so that capacity is provided for in the short-medium term and Ms Hampson comments that collectively these areas would provide capacity for 165 rural residential dwellings. However, she comments that *"sufficiency of rural residential capacity in the medium-term would be improved, but not resolved. A shortfall in the medium term would still be likely (between 47 and 124 depending on whether you include the competitiveness margin"*. Therefore, there would still be a need for additional LLRZ land, and the proposal is a way to achieve this in an efficient and consolidated location.
- 122 Turning to Policy 8 of the NPS: UD, 'significant' is not defined nor quantified. In this sense, Ms Hampson notes that whilst a net increase of 27 lots may appear small numerically, in the context of her assessment and for the matters set out in paragraphs 81-81.6 above, the proposal meets the test of significance under Policy 8. I rely upon Ms Hampson's advice and conclude that the proposal will add significantly to development capacity and thus the local authority must be responsive to the proposal per the direction in Policy 8.
- 123 Lastly Ms Hampson concludes that the economic benefits of the proposal outweigh any potential economic costs and that it is an efficient outcome for the community and urban form of Woodend. Of note, Ms Hampson's economic costs speak to the loss of primary productive land, which I note **Mr Mthamo** considers in his evidence.
- 124 Based on the detailed assessment of Ms Hampson, I consider that the proposal will assist in addressing a likely shortfall in capacity in Woodend/Pegasus in the medium-term and provide significant development capacity to the Waimakariri district for rural residential purposes.

Real estate

- 125 **Mr Twiss** has provided evidence on property and real estate, and his views are supplementary to the economic evidence provided by **Ms Hampson** above.
- 126 Mr Twiss confirms that there is a lack of supply for rural residential lots in Woodend, with Copper Beach being the only recent development which is currently marketing its final stage.

²⁴ Refer to paragraph 76 of Ms Hampson's evidence

- 127 The provision of additional LLRZ would offer a good range of potential housing options in Woodend, noting the current supply is predominantly smaller residential lots.
- 128 Relying upon Mr Twiss' evidence, I conclude that the proposal will assist towards meeting the demand of rural residential lots in Woodend.

Infrastructure and servicing

- 129 Infrastructure and servicing issues have been addressed in the evidence of **Mr McLeod**.
- 130 Overall, the evidence of Mr McLeod demonstrates that:
- All of the necessary reticulated infrastructure can be extended to serve the site.
 - Council have confirmed, through their Activity Management Plan for water and wastewater, that there are planned upgrades to cater for projected growth in the area.²⁵
 - Electricity and fibre network providers have confirmed the existing network has capacity to service the proposal.
 - Stormwater runoff can be managed on-site to ensure post-development runoff is no greater than pre-development levels, and a range of feasible stormwater treatment options are available.
 - Potential flood risk can be managed through the setting of appropriate minimum floor levels for future buildings on site.
- 131 Based on the above, the detailed design of the development can be confirmed at subdivision consent stage, which will also further confirm engineering design details.
- 132 With respect to funding of this, the infrastructure upgrades that are required for the development are not comprehensive, are considered feasible to enable development and can be funded either privately or in partnership with the infrastructure providers and other landowners depending on the final demands in the area once rezonings for the area have been completed.
- 133 Based on Mr McLeod's advice, the proposal can be adequately serviced such that the rezoning is appropriate.

Positive effects

²⁵ Paragraphs 12-14, 17-18 of Mr McLeod's evidence

- 134 The proposal will result in multiple positive effects as part of the rezoning from RLZ to LLRZ, including:
- The proposal will provide for 27 allotments which will assist in providing for the additional capacity of housing required in Woodend, providing housing choice in a high demand area.
 - Rezoning the site will promote a consolidated and compact urban form, the LLRZ is a natural extension to that located to the south-west of the site.
 - The proposal will not restrict further development of Woodend, noting the site to the west (129 Gladstone) will remain as RLZ and provide the potential for further growth if necessary in the future.
 - The proposal presents an efficient use of land that will otherwise be marginalised by the Woodend Bypass.
 - Future development of the site will be managed through the implementation of the ODP.
- 135 To conclude the above, the proposal provides an opportunity to enable development which is in an efficient location and will assist in achieving a well-functioning urban environment.

PART 2 OF THE RMA

- 136 Section 74 of the RMA requires the rezoning request to be assessed under the provisions of Part 2 of the Act. Part 2 is the overarching purpose and principles of the RMA.
- 137 Section 5 sets out the purpose of the RMA, that being to promote sustainable management of natural and physical resources.
- 138 As set out within the above AEE the proposal will provide for people and communities social, economic and cultural wellbeing by providing an efficient and consolidated development. The site is seen as a natural extension to the adjoining LLRZ and will be effectively consolidated by the NZTA designation to the east. It is considered that any adverse effects can be avoided, remedied or mitigated.
- 139 Section 6 requires that matters of national importance must be recognised and provided for. In respect of the proposal, there are no matters of national importance to consider.
- 140 Section 7 sets out the other matters for which regard must be given towards. The proposal has considered these 'other matters' as set out within the above AEE. This includes the fact that the proposal is an efficient use of the natural resource, will maintain and enhance amenity values and maintain the quality of the rural environment.

141 Section 8 requires all persons exercising functions and powers under the RMA to take into account the principles of the Treaty of Waitangi. The proposal is considered consistent with the principles of the Treaty of Waitangi.

142 Overall it is considered that the proposal will achieve the purpose and principles of the RMA.

MATTERS RAISED BY SUBMITTERS

143 I am not aware of any submissions or further submissions that oppose the relief sought by Crichton.

CONCLUSION

144 Crichton are requesting to rezone the site from RLZ to LLRZ. The proposed rezoning and ODP would provide for approximately 27 new allotments.

145 No changes are proposed to the objectives, policies and rules of the PDP. However, a new ODP is proposed to be included as 'Gladstone Development Area' within the Development Area – Existing Development Areas chapter of the PDP.

146 The Section 32AA assessment in **Appendix 3** demonstrates that rezoning the land to LLRZ is the most effective and efficient option for this site when considering the costs and benefits of the status quo (retaining the RLZ).

147 An assessment of the relevant National Policy Statements, CRPS and the PDP have been undertaken in accordance with Section 74 of the RMA. These assessments demonstrate that, whilst there is some tension with some of the CRPS policies, the proposal otherwise gives effect to the provisions. The proposal provides for a consolidated and logical development which will support the shortfall in capacity, and also support the provision of housing variety and choice. The proposal will enable the Waimakariri District Council to use the site to address the shortfall in housing for the medium term.

148 The AEE identifies that the potential adverse effects associated with the rezoning will be acceptable.

149 The proposal is considered an efficient and effective use of the land and is able to be connected to existing services in an efficient and feasible manner. The proposal will contribute positively to the amenity and character of the surrounding rural-residential environment and is consistent with Part 2 of the RMA in providing for sustainable use of resources for future generations.

150 To conclude the above, the relief sought by Crichton is to rezone the site at 145-167 Gladstone Road to LLR, to amend the planning maps

to include the area as LLR and to insert the ODP as an 'existing development area' within the PDP.

Dated: 5 March 2024

Georgia Brown

Appendix 1: Outline Development Plan

LEGEND

- Outline Development Plan Area
- Rural Lifestyle Zone
- Large Lot Residential Zone
- Woodend Bypass Designation
- Indicative (Collector) Road
- Indicative Local Road Connection
- Indicative Pedestrian-Cycle Network
- S Indicative Stormwater Management Areas (size and location to be confirmed)
- A Landscape Treatment
- Acoustic Buffer



A. OUTLINE DEVELOPMENT PLAN (SCALE 1:5,000@A3)

Map / image source: CANTERBURY MAPS



Appendix 2: Proposed Development Area to be inserted into the PDP

GSR - Gladstone Road Development Area

The Gladstone Road Development Area is located on the eastern edge of Woodend township and is identified as an area for large lot residential activity. The site is located to the south of Gladstone Road and to the north-east of the East Woodend Development Area. The topography of the area is generally flat. The surrounding rural area to the north, east and south is predominantly used for pastoral farming. To the south-west is existing rural residential development and general residential west. The NZTA designation runs partially within the eastern area of the site, and forms the eastern boundary of the development area.

The DEV-GSR-APP1 provides for:

- A Collector Road linking Gladstone Road to the north, with the potential for a future connection to the south
- An indicative Local Road connection from the Collector Road to provide a future connection to the west.
- Indicative pedestrian-cycle network alongside the Collector Road and midblock, providing a potential connect to the west and towards the east
- An indicative stormwater management area
- Landscape treatment and acoustic buffer

Activity Rules

DEV-GSR-31 Gladstone Road Development Area Outline Development Plan	
<p>Activity Status: PER</p> <p>Where:</p> <ul style="list-style-type: none"> (a) Development shall be in accordance with DEV-GSR-APP1, inclusive of: (b) A 3m high earth bund shall be proposed along the eastern boundary of the site adjacent to the NZTA designation for the purposes of forming both acoustic and landscape mitigation; and (c) The eastern boundary shall be landscaped for a width of 6m*, with species planted at 1m centres capable of achieving a minimum height of 5m once established. Species shall include: <ul style="list-style-type: none"> i. <i>Griselinia littoralis</i>, Broadleaf; 	<p>Activity status when compliance not achieved: DIS</p>

<ul style="list-style-type: none">ii. <i>Cordyline australis</i>, Ti kouka;iii. <i>Pittosporum tenuifolium</i>, Kohuhu;iv. <i>Podocarpus totara</i>, Totara;v. <i>Phormium tenax</i>, Flax;vi. <i>Dacrycarpus dacrydioides</i>, Kahikatea;vii. <i>Sophora microphylla</i>, SI Kowhai;viii. Korokia species; andix. <i>Cortaderia richardii</i>, SI Toetoe. <p>*Note this 6m width can encompass the 3m bund.</p>	
---	--

Advisory note: for the avoidance of doubt, where an Activity or Built Form Standard is in conflict with this ODP, the ODP shall substitute the provision.

BUILT FORM STANDARDS

There are no specific built form standards for the Gladstone Road ODP area.

APPENDIX

DEV-GSR-APP1 Gladstone Road ODP

Appendix 3: Section 32AA Assessment

Section 32AA Assessment

The following assessment under section 32AA is undertaken as part of the submission requesting re-zoning of the site at 145-167 Gladstone Road, Woodend from RLZ to LLRZ. The submission does not seek to propose any new objectives or policies into the PDP, albeit it requests the addition of a Development Area into 'existing development area' section of the PDP, refer Appendix 2.

Section 32AA(1)(b) states that a further evaluation required under the RMA must be undertaken in accordance with Section 32(1) to (4). A Section 32 report requires the submitter (and the Council) to evaluate, at a level of detail corresponding to the scale and significance of the anticipated environmental, the economic, social and cultural effects, including:

- The extent to which the objectives of the proposal are the most appropriate to achieve the purpose of the RMA.
- Whether the proposed provisions (rules) are the most appropriate way for achieving the objectives (purpose), by including consideration of any other reasonably practicable options, the efficiency and effectiveness of the provisions in achieving the purpose, and reasons for deciding on the provisions.

Two options are assessed below. These are:

1. retention of the RLZ proposed in the PDP; or
2. application of the LLRZ proposed by the submitter.

Option 1: Retain the RLZ proposed in the PDP (status quo)

MATTER	BENEFIT	COST
ENVIRONMENTAL	<ul style="list-style-type: none"> - Retaining the RLZ would result in limited, if any change to the existing visual environment or rural character. - Reduced traffic generation as less vehicle movements would be associated with the site. 	<ul style="list-style-type: none"> - Loss of rural productive land in Woodend, albeit an insignificant loss in the context of the district.
ECONOMIC	<ul style="list-style-type: none"> - No direct cost to the landowner or Council to retain the proposed RLZ. - Land is retained for rural productive purposes, although rural productive capacity is unlikely to be realised on the site. 	<ul style="list-style-type: none"> - Does not contribute to the identified housing capacity shortfall across the medium term in Woodend and the Waimakariri District. - Does not contribute to the identified shortfall in rural-residential property.

		- A demand for rural residential housing would result in increased house prices.
SOCIAL	- Maintains an open space / rural outlook for those located to the south-west.	- No opportunity/requirement to provide any visual acoustic buffer to the NZTA designation. - No opportunity for provision of connections to adjoining development area.
CULTURAL	- No cultural benefits identified.	- No cultural costs identified.

Option 1, which seeks to retain the status quo (i.e. retain the RLZ), has slightly greater costs than benefits. The benefit of the option would be that the rural character of the site and outlook from existing properties to the south-west would not change. The option to utilise the site for productive rural use would be retained and there would not be any contribution to residential expansion in the south-east of Woodend.

The costs of retaining the RLZ would mean that there will be no residential development capacity provided on the site which would contribute to the identified shortfall in the medium term for the Woodend/Pegasus locality and the Waimakariri District as a whole. In particular, there would also be a shortfall in rural residential development within the locality and the Waimakariri District. This would result in a missed opportunity for the Council to demonstrate and supply residential housing capacity in the medium term as required by the NPS: UD.

Overall, the costs outweigh the benefits and Option 1 is the least preferred option.

Option 2: Re-zone to proposed LLRZ.

MATTER	BENEFIT	COST
ENVIRONMENTAL	- Rezoning to LLRZ would result in limited if any change to the existing visual environment or rural character.	- Loss of rural productive land in Woodend, albeit an insignificant loss in the context of the district.
ECONOMIC	- Is a more efficient use of the land, providing for more dwelling growth within the urban area. - Supports increased residential development opportunities, i.e. greater housing choice/variety. - Will provide additional housing capacity to meet a likely shortfall in the medium term. - Increases supply of LLR which in turn will provide greater supply/competition to this sector of the market.	- Loss of rural productive land in Woodend.

SOCIAL	<ul style="list-style-type: none"> - Already adjoins existing LLR development to the south-west, thereby assisting in providing an integrated neighborhood. - Provides for increased housing in proximity to existing community facilities and other social infrastructure. - Provision of acoustic and landscape treatment as a buffer to the NZTA designation, thus increased amenity protection provided. 	<ul style="list-style-type: none"> - Would result in a loss of rural outlook/character to those persons to the south-west.
CULTURAL	<ul style="list-style-type: none"> - No cultural benefits identified. 	<ul style="list-style-type: none"> - No cultural costs identified.

Option 2 is the preferred option as requested through the submission. Re-zoning the site to LLRZ will provide additional capacity through the provision of 27 residential allotments, which will contribute to the shortfall in the medium term, identified by **Ms Hampson**. The site will sit within an efficient and consolidated location, being connected to an existing LLRZ zone and separated from the rural environment via the proposed Woodend Bypass. Connectivity to the adjoining existing LLRZ will allow for good integration and promote a consolidated urban form.

The proposal best meets the relevant objectives and policies of the PDP. The benefits of the re-zoning are also considered to outweigh the costs. Therefore, option 2 is considered to be most appropriate.

EFFICIENCY

Option 2, rezoning the site to LLRZ, has been assessed as the most efficient use of the land and is the most appropriate option when the costs and benefits of both are compared. The benefits of Option 2 are considered to outweigh the costs, meaning that is the most efficient option and most appropriate use of the land.

EFFECTIVENESS

Option 2 has been assessed as the preferred option to give effect to the outcomes sought by the PDP. The proposal provides the opportunity for continued sustainable residential growth in Woodend. The proposal will provide for a well-functioning urban environment that will assist in adding towards the supply of residential housing in the medium term, as well as providing for the variety of homes that meet the needs of different households. The rezoning and ODP will provide for a consolidated residential development and will have sufficient future infrastructure servicing and accessibility.

As set out within the assessment of the PDP objectives and policies assessment in **Appendix 4**, the re-zoning to LLRZ is consistent with all relevant objectives and policies as relating to strategic directions, subdivisions, urban growth, and residential. Whilst the Council has not acknowledged that there is a shortfall in housing capacity, this is clearly the case based on evidence provided as part of PC31 and based on Ms Hampson's further analysis as part of this proposal. The site is located in an efficient location that will enable consolidation of the urban environment and is considered an appropriate location for rural residential development. The site is bounded by existing rural-residential to the south-west and the NZTA designation along the east forms a clear barrier between the development site and the rural environment thereby foreclosing any further expansion of the urban environment. The site can be serviced and is easily accessible, therefore assisting in supporting the creation of a well-functioning environment and contributing to people's wellbeing and sustainability.

RISK OF ACTING OR NOT ACTING

Section 32(2)(c) of the RMA requires that the assessment of the efficiency and effectiveness of the provisions in achieving the objectives must assess the risks of acting or not acting if there is insufficient information about the subject matter of the provisions. This requirement also applies to the assessment of any changes under Section 32AA.

The submission to the PDP has provided detailed technical reports and evidence to confirm the suitability of the site for the proposed rezoning. The information has been provided in as much detail as necessary for the purpose of the rezoning, however specific details such as final engineering and servicing design are not yet known. This poses a small risk of acting. However, any risks will be addressed and appropriately detailed at the time of subdivision consent, detailed engineering design and engineering approval stage.

There is also a risk of not acting. It has been identified there is a housing shortfall within the Waimakariri District for the medium term, and by not acting residential demand will continue to increase. In addition, there is a shortfall of rural residential capacity within the Waimakariri District, being a subset of residential development overall. Therefore, the risk of not acting has the likely potential to result in increased house prices for this typology. Therefore, the risk of not acting is also that the Council will not meet their requirements under the RMA and the NPS: UD to meet the needs of future generations by providing sufficient housing development capacity.

Appendix 4: Objectives and Polices Assessment

ASSESSMENT OF THE NATIONAL POLICY STATEMENT ON URBAN DEVELOPMENT OBJECTIVES AND POLICIES

The NPS: UD applies to all local authorities that have all or part of an urban environment within their district or region, and to planning decisions by any local authority that affect an urban environment.

Objectives	Related policies	Assessment
<p>Objective 1: 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.</p> <p>Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.</p>	<p>Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:</p> <ul style="list-style-type: none"> a) Have or enable a variety of homes that: <ul style="list-style-type: none"> - Meet the needs, in terms of type, price, and location, of different households; and - Enable Māori to express their cultural traditions and norms; and b) Have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and c) Have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and d) Support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and e) Support reductions in greenhouse gas emissions; and f) Are resilient to the likely current and future effects of climate change. 	<p>The submission seeking to rezone the site to LLRZ will enable a variety of homes which will meet the needs of different households. The site will be provided with good accessibility to the adjacent road network and with access to open space areas within the vicinity of the site. The ODP will provide opportunities with connections to the surrounds, including active connections through cycle/pedestrian accessways.</p> <p>The rezoning is considered to support the competitive operation of land and development market for the product (LLRZ), in an area where there is a shortfall in capacity (as assessed by Ms Hampson). The proposal will assist in addressing the projected shortfall of capacity in the medium term, as outlined within Ms Hampson’s evidence.</p> <p>The proposal is considered to be in an appropriate location to support reductions in greenhouse gas emissions, noting it is efficiently located to a town centre and transport routes.</p> <p>The proposal is resilient to the likely and future effects of climate change as the site is not affected by any significant natural hazards. Flood hazard effects can be sufficiently mitigated as per the evidence of Mr McLeod.</p>
	<p>Policy 2: Tier 1, 2 and 3 local authorities, at all times, provide at least sufficient development</p>	<p>The proposal will assist towards providing the necessary development capacity to meet</p>

	<p>capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.</p>	<p>expected demand in medium term, relying on Ms Hampson's evidence which states that there will be a shortfall in the medium term if additional capacity is not provided within the Waimakariri District.</p> <p>The proposal is consistent with this policy and Objectives 1 and 2.</p>
<p>Objective 4: 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.</p>	<p>Policy 6: When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters:</p> <ul style="list-style-type: none"> a) The planned urban built form anticipated by those RMA planning documents that have given effect to the National Policy Statement. b) That the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes: <ul style="list-style-type: none"> (i) May detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and (ii) Are no, of themselves, an adverse effect. c) The benefits of urban development that are consistent with well-functioning urban environments d) Any relevant contribution that will be made to the requirements of this 	<p>Whilst the Council has yet to give effect to the matter as relevant to (a) and (b), broadly speaking the proposal can still be assessed against the policy.</p> <p>The proposed rezoning to LLRZ will result in a change to the existing amenity values as a result of a higher density of development. However, the proposal will provide for an increase in the variety of housing density/type within Woodend and therefore improve the amenity values appreciated by other people within the community.</p> <p>The proposal is considered to achieve a well-functioning urban environment as it provides for an efficient and consolidated development which will be connected to an existing area of rural-residential. The NZTA designation will form a clear barrier to the site and prevent further growth into the rural environment.</p> <p>The proposal will assist in meeting the shortfall of development capacity within the medium-term. The site is not affected by any significant natural hazards and is considered to be appropriately located such that the likely current and future effects of climate change can be managed.</p>

	<p>National Policy Statement to provide or realise development capacity</p> <p>e) The likely current and future effects of climate change.</p>	
<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>Policy 8: 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:</p> <p>(a) Unanticipated by RMA planning documents; or</p> <p>(b) Out-of-sequence with planned land release.</p>	<p>As determined by Ms Hampson, the proposal meets the test of adding significantly to development capacity within the district. Further, as assessed above, the proposal will contribute to a well-functioning urban environment even though the development capacity is unanticipated by RMA planning documents, in this case the CRPS.</p> <p>Overall the proposal is consistent with this policy, and in turn is considered consistent with objective 6 noting the Council must be responsive where a proposal would supply significant development capacity.</p>
<p>Objective 8: New Zealand's urban environments:</p> <p>(a) Support reductions in greenhouse gas emissions; and</p> <p>(b) Are resilient to the current and future effects of climate change.</p>		<p>The proposal will assist in supporting reductions in greenhouse gas emissions, acknowledging that the proposal will be in an efficient location that is in an accessible location to existing community facilities and employment opportunities of Woodend/Ravenswood.</p>

Based on the above assessment, I consider the proposal achieves a well-functioning environment as sought by the NPS: UD. In addition, the proposal will assist in meeting the development capacity over the medium-term.

ASSESSMENT OF PROPOSAL – OBJECTIVES AND POLICIES OF THE CANTERBURY REGIONAL POLICY STATEMENT

The CRPS became operative of 15 January 2013 and gives an overview of the significant resource management issues facing the Canterbury Region, including objectives, policies and methods to address and/or resolve those issues. The Canterbury Regional Council and territorial authorities are required to give effect to the CRPS through their regional and district plans.

The following assessment considers the objectives and policies of most relevance to the proposal.

RELEVANT OBJECTIVES AND POLICIES	ASSESSMENT
CHAPTER 5 – LAND USE AND INFRASTRUCTURE	
<p>Objective 5.2.1 Location, Design and Function of Development (Entire Region) Development is located and designed so that it functions in a way that:</p> <ol style="list-style-type: none"> 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 2. Enables people and communities, including future generations, to provide for their social, economic and cultural well-being and health and safety; and which... 	<p>The proposal is consistent with this objective as it will achieve consolidated development around an existing urban area. It will provide for the continued expansion of the existing rural-residential development to the south-west of the site with the NZTA designation providing a clear barrier to the east and preventing further growth into this rural environment.</p>
<p>Objective 5.2.3 Transport network (Wider Region) A safe, efficient and effective transport system to meet local regional, inter-regional and national needs for transport, which:</p> <ol style="list-style-type: none"> 1. Supports a consolidated and sustainable urban form; 2. Avoids, remedies or mitigates the adverse effects of transport use and its provision; 3. Provides an acceptable level of accessibility; and 4. Is consistent with the regional roading hierarchy identified in the Regional Land Transport Strategy. 	<p>The proposal will provide a consolidated and sustainable urban form, with active transport modes provided within the site and allowing connection to future corridors. The proposal will provide an acceptable level of accessibility to the surroundings. Per the evidence of Mr Gallot, the proposal will not adversely affect the safety or efficiency of the transport system.</p>
<p>Policy 5.3.1 Regional growth (Wider Region) To provide, as the primary focus for meeting the wider region’s growth needs, sustainable development patterns that:</p> <ol style="list-style-type: none"> 1. Ensure that any.... 	<p>The proposal will support sustainable urban development, through the provision of a natural extension of the existing rural-residential development which will be effectively framed via the NZTA designation, thus restricting further growth. The NZTA designation will also form a clear barrier between the urban and rural environments.</p>

<ol style="list-style-type: none"> 2. Encourage within urban areas, housing choice, recreation and community facilities, and business opportunities of a character and form that supports urban consolidation; 3. Promote energy efficiency in urban forms, transport patterns, site location and subdivision layout; 4. Maintain and enhance the sense of identity and character of the region's urban areas; and 5. Encourage high quality urban design, including the maintenance and enhancement of amenity values 	<p>The proposal will provide for a variety of housing choice and will maintain and enhance the existing rural character of this part of the Canterbury Region. Additionally, it is considered that the locality of the proposal is appropriate such that it will provide a consolidated urban form which will have greater energy/transport efficiency when compared to the location of other LLRZ/LLRZO proposed in the District (i.e. Oxford and Swannanoa) which are located further from the main urban centres.</p>
<p>Policy 5.3.3 Management of development (Wider Region) To ensure that substantial developments are designed and built to be of a high-quality, and are robust and resilient:</p> <ol style="list-style-type: none"> 1. Through promoting, where appropriate, a diversity of residential, employment and recreational choices, for individuals and communities associated with the substantial development; and 2. Where amenity values, the quality of the environment, and the character of an area are maintained or appropriately enhanced. 	<p>The proposal is consistent with this policy as it will add to the diversity of residential choices for individuals in Woodend. The amenity values and quality of the environment and character of the rural area will be maintained and/or enhanced through the provision of minimum lot sizes consistent with the rural residential development to the south-west of the site. A landscape buffer alongside the western side of the NZTA designation will maintain amenity values to future occupiers.</p>
<p>Policy 5.3.5 Servicing development for potable water, and sewage and stormwater disposal (Wider Region) Within the wider region, ensure development is appropriate and efficiently served for the collection, treatment, disposal or re-use of sewage and stormwater, and the provision of potable water, by:</p> <ol style="list-style-type: none"> 1. Avoiding development which will not be served in a timely manner to avoid or mitigate adverse effects on the environment and human health; 2. Requiring these services to be designed, built, managed or upgraded to maximise their on-going effectiveness. 	<p>As per the infrastructure evidence provided by Mr McLeod, the proposed development can be appropriately and efficiently serviced for potable water, sewage and stormwater. The upgrades needed are not comprehensive and are considered feasible to enable development. They can be funded either privately or in partnership with the infrastructure providers and other landowners depending on final demands in the area once other rezonings have been completed.</p>
<p>Policy 5.3.6 Sewerage, stormwater and potable water infrastructure (Wider Region) Within the wider region:</p> <ol style="list-style-type: none"> 1. Avoid development which constrains the on-going ability of the existing sewerage, stormwater and potable water supply infrastructure to be developed and used. 	<p>As per the infrastructure evidence provided by Mr McLeod, the proposed development can be appropriate and efficiently serviced for potable water, sewage and stormwater. The proposal will not constrain the on-going ability of these services to be developed and used. Any potential adverse effects will be able to be appropriately controlled.</p>

<ol style="list-style-type: none"> 2. Enable sewerage, stormwater and potable water infrastructure to be developed and used, provided that, as a result of its location and design: <ol style="list-style-type: none"> a. The adverse effects on significant natural and physical resources are avoided, or where this is not practicable, mitigated; and b. Other adverse effects on the environment are appropriately controlled. 3. Discourage sewerage, stormwater and potable water supply infrastructure which will promote development in locations which do not meet Policy 5.3.1. 	<p>With respect to funding, the upgrades are not comprehensive, and are considered feasible to enable development. They can be funded either privately or in partnership with the infrastructure providers and other landowners depending on the final demands in the area once other rezonings have been completed.</p>
<p>Policy 5.3.7 Strategic land transport network and arterial roads (Entire Region) In relation to strategic land transport network and arterial roads, the avoidance of development which:</p> <ol style="list-style-type: none"> 1. Adversely affects the safe efficient and effective functioning of this network and these roads, including the ability of this infrastructure to support freight and passenger transport services; and 2. In relation to the strategic land transport network and arterial roads, to avoid development which forecloses the opportunity for the development of this network and these roads to meet future strategic transport requirements. 	<p>Per the traffic evidence provided by Mr Gallot, the proposal will not adversely affect the safe, efficient and effective functioning of the strategic network and arterial roads.</p>
<p>Policy 5.3.12 Rural production (Wider Region) Maintain and enhance natural and physical resources contributing to Canterbury’s overall rural productive economy in areas which are valued for existing or foreseeable future primary production, by:</p> <ol style="list-style-type: none"> 1. Avoiding development, and/or fragmentation which: <ol style="list-style-type: none"> a. Forecloses the ability to make appropriate use of that land for primary production; and/or b. Results in reverse sensitivity effects that limit or precludes primary production. 2. Enabling tourism, employment and recreational development in rural areas, provided that it: ... and; 	<p>As mentioned, the proposal will result in the loss of primary productive land. However, per the evidence of Mr Mthamo, this will be insignificant in the context of the District, resulting in a 0.003% and 0.002% loss of LUC1 and LUC2 respectively under the CRPS definition of HPL.</p> <p>The proposal does not adjoin any intensive rural production activities that would be incompatible with rural residential use or result in the potential for reverse sensitivity.</p>

<p>3. Ensuring that rural land use intensification does not contribute to significant cumulative adverse effects on water quality and quantity.</p>	
<p>CHAPTER 6 RECOVERY AND REBUILD OF GREATER CHRISTCHURCH</p>	
<p>Policy 6.2.1 Recovery framework Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that:</p> <ol style="list-style-type: none"> 1. Identifies priority areas for urban development within Greater Christchurch 2. Identifies Key Activity Centres which provide a focus for high quality, and, where appropriate, mixed-use development that incorporates the principles of good urban design; 3. Avoids urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS; 4. Protects outstanding natural features and landscapes including those within the Port Hills from inappropriate subdivision, use and development; 5. Protects and enhances indigenous biodiversity and public space; 6. Maintains or improves the quantity and quality of water in groundwater aquifers and surface waterbodies, and quality of ambient air; 7. Maintains the character and amenity of rural areas and settlements; 8. Protects people from unacceptable risk from natural hazards and the effects of sea-level rise; 9. Integrates strategic and other infrastructure and services with land use development; 10. Achieves development that does not adversely affect the efficient operation, use, development, appropriate upgrade, and future planning of strategic infrastructure and freight hubs; 11. Optimises use of existing infrastructure; and 	<p>The proposal is not considered consistent with parts 1 and 3 this policy - whilst the site is within the Greater Christchurch Area, as shown on Map A, it is not within a priority area, and is outside of the existing urban area. However, the proposal otherwise is able to meet the following parts of the policy (as relevant to residential):</p> <ol style="list-style-type: none"> 1. The proposal will not impact any outstanding natural features or landscapes. 2. The proposal will not impact upon public space and is unlikely to impact indigenous biodiversity (although this can be considered through the subdivision consent process if necessary). 3. Through detailed engineering design the proposal will be required to ensure appropriate stormwater management such that there are no adverse impacts on the quantity and quality of groundwater 4. Per the advice of Mr Compton-Moen, the proposal will maintain the character and amenity of the rural area. 5. Appropriate mitigation through detailed design / the subdivision consenting stage will ensure any adverse effects from flood hazards are suitably managed. 6. The proposed rezoning is able to integrate strategic and other infrastructure services with the development. 7. The proposal will not adversely affect the efficient operation, use development of strategic infrastructure, noting appropriate mitigation will be required to manage effects from the future NZTA designation such that reverse sensitivity effects will be unlikely to arise. 8. The development is able to utilise existing infrastructure, albeit if that is required to be extended to serve the development site.

<p>12. Provides for development opportunities on Māori Reserves in Greater Christchurch.</p>	<p>9. This aspect of the policy is not applicable noting the site is not Māori Reserve.</p>
<p>Policy 6.3.1 Development within the Greater Christchurch area In relation to recovery and rebuilding for Greater Christchurch;</p> <ol style="list-style-type: none"> 1. Give effect to the urban form identified in Map A, which identifies the location and extent of urban development that will support recovery, rebuilding and planning for future growth and infrastructure delivery; 2. Give effect to the urban form identified in Map A by identifying the location and extent of the identified Key Activity Centres; 3. Enable development of existing urban areas and greenfield priority areas, including intensification in appropriate locations, where it supports the recovery of Greater Christchurch; 4. Ensure new urban activities only occur within existing urban areas or identified greenfield priority areas as shown on Map A, unless they are expressly provided for in the CRPS; 5. Provide for commercial film or video production activities in appropriate commercial, industrial and rural zones within the Christchurch District; 6. Provide for a metropolitan recreation facility at 466-482 Yaldhurst Road; and 7. Avoid development that adversely affects the function and viability of, or public investment in, the Central City and Key Activity Centres. 	<p>The proposal is not considered consistent with this policy, noting the site is outside of the existing urban area shown in Map A. The proposal is not otherwise expressly provided for in the CRPS.</p>
<p>Policy 6.3.3 Development in accordance with outline development plans Development in greenfield priority areas or Future Development Areas and rural residential development is to occur with the provisions set out in an outline development plan or other rules of the area. Subdivision must not proceed ahead of the incorporation of an outline development plan in a district plan. Outline development plans and associated rules will:</p> <ol style="list-style-type: none"> 1. Be prepared as: 	<p>The proposal includes an ODP that will guide the future development of the site. The ODP has been prepared as a single plan for the whole of the proposed LLRZ that addresses all of the matters in part 3 (a – i) of the policy.</p> <p>The ODP is proposed to be inserted into the PDP – Part 3 – Area Specific Matters / Wāhanga waihanga – Development Areas / Existing Development Areas</p>

<ol style="list-style-type: none"> a. A single plan for the whole of the priority area or Future Development Area; or b. Where an integrated plan adopted by the territorial authority exists for the whole of the priority area or Future Development Area and the outline development plan is consistent with the integrated plan, part of that integrated plan; or c. A single plan for the whole of the rural residential area; and 2. Be prepared in accordance with the matters set out in Policy 6.3.2; 3. To the extent relevant show proposed land uses including: <ol style="list-style-type: none"> a. Principal through roads, connections with surrounding road networks, relevant infrastructure services and areas for possible future development; b. Land required for community facilities or schools; c. Parks and other land for recreation; d. Land to be used for business activities; e. The distribution of different residential densities, in accordance with Policy 6.3.7; f. Land required for stormwater treatment, retention and drainage paths; g. Land reserved or otherwise set aside from development for environmental, historic heritage, or landscape protection or enhancement; h. Land reserved or otherwise set aside from development for any other reason, and the reasons for its protection from development; i. Pedestrian walkways, cycleways and public transport routes both within and adjoining the area to be developed. 4. Demonstrate how Policy 6.3.7 will be achieved for residential areas within the area that is the subject of the outline development plan, including any staging; 5. Identify significant cultural, natural or historic heritage features and values, and show how they are to be protected and/or enhanced; 	<p>There are no significant cultural, natural or historical features that need to be protected on the site.</p> <p>In terms of funding, the infrastructure upgrades that are required are not comprehensive, are considered feasible to enable development and can be funded either privately or in partnership with the infrastructure providers and other landowners depending on the final demands in the area once other rezonings have been completed.</p> <p>The proposal is not to be staged, and no staging is necessary. The coordination of subdivision can occur at the time of content.</p> <p>The ODP demonstrates how effective provision is made for transport options, including vehicular access, pedestrian and cycling connections to the wider environment. The site is easily accessible to both Woodend and Pegasus towns.</p> <p>The ODP demonstrates, through the proposed visual and acoustic buffer, how potential adverse effects from designated strategic infrastructure will be appropriately mitigated.</p> <p>Any other potential adverse effects on the environment can be appropriately managed at the time of subdivision, including the setting of minimum floor levels to manage potential flood hazards.</p>
--	--

<ol style="list-style-type: none"> 6. Document the infrastructure required, when it will be required and how it will be funded; 7. Set out the staging and co-ordination of subdivision and development between landowners; 8. Demonstrate how effective provision is made for a range of transport options including public transport options and integration between transport modes, including pedestrian, cycling, public transport, freight, and private motor vehicles; 9. Show how other potential adverse effects on and/or from nearby existing or designated strategic infrastructure (including requirements for designations, or planned infrastructure) will be avoided, remedied or appropriately mitigated; 10. Show how other potential adverse effects on the environment, including the protection and enhancement of surface and groundwater quality, are to be avoided, remedied or mitigated; 11. Show how the adverse effects associated with natural hazards are to be avoided, remedied or mitigated as appropriate and in accordance with Chapter 11 and any relevant guidelines; and 12. Include any other information that is relevant to an understanding of the development and its proposed zoning. 	
<p>Policy 6.3.9 Rural residential development In Greater Christchurch, rural residential development further to areas already zoned in district plans as at 1 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:</p> <ol style="list-style-type: none"> 1. In the case of Christchurch City, no further rural residential development is to be provided for within the Christchurch City Plan area; 2. The location must be outside the greenfield priority areas for development, Future Development Areas, and existing urban areas; 3. All subdivision and development must be located so that it can be economically provided with a reticulated sewer and water supply 	<p>The proposal provides for rural residential development that is not located within an area included within the RRDS. Therefore, the proposal is not consistent with this policy.</p> <p>Notwithstanding, the proposal can otherwise meet 2 – 7 of this policy, therefore could be considered a suitable location despite not being listed within the RRDS.</p>

integrated with a publicly owned system, and appropriate stormwater treatment and disposal;

4. 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;
5. The location and design of any proposed rural residential development shall:
 - 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;
 - b. Avoid the groundwater protection zone for Christchurch City's drinking water;
 - c. Avoid land between the primary and secondary stop banks south of the Waimakariri River;
 - d. Avoid land required to protect the landscape character of the Port Hills;
 - e. Not compromise the operational capacity of the Burnham Military Camp, West Melton Military Training Area or Rangiora Airfield;
 - f. Support existing or upgraded community infrastructure and provide for good access to emergency services;
 - g. Avoid significant reverse sensitivity effects with adjacent rural activities, including quarrying and agricultural research farms, or strategic infrastructure;
 - h. Avoid significant natural hazard areas including steep or unstable land;
 - i. Avoid significant adverse ecological effects, and support the protection and enhancement of ecological values;
 - j. Support the protection and enhancement of ancestral land, water sites, wahi tapu and wahi taonga of Ngai Tahu;

<ul style="list-style-type: none">k. 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; andl. Avoid adverse effects on existing surface water quality. <p>6. 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.</p> <p>7. A rural residential development area shall not be regarded as in transition to full urban development.</p>	
--	--

Based on the above assessment, I consider it is clear that the proposal is not consistent with a number of the policies in Chapter 6 of the CRPS. However, as shown above there is some support for the proposal in chapter 5.

ASSESSMENT OF PROPOSAL AGAINST PROPOSED WAIMAKARIRI DISTRICT PLAN OBJECTIVES AND POLICIES (as notified)

PWDP Provision	Assessment of Proposed Rezoning
<p>SD - STRATEGIC DIRECTIONS</p> <p>SD-O2 Urban development Urban development and infrastructure that:</p> <ol style="list-style-type: none"> 1. Is consolidated and integrated with the urban environment 2. That recognises existing character, amenity values, and is attractive and functional to residents, businesses and visitors; 3. Utilises the District Council’s reticulated wastewater system, and potable water supply and stormwater infrastructure where available; 4. 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 RFD-O1 5. Supports a hierarchy of urban centres, with the District’s main centres in Rangiora, Kaiapoi, Oxford and Woodend being: <ol style="list-style-type: none"> a. The primary centres for communities facilities; b. The primary focus for retain, office and other commercial activity; and c. The focus around which residential development and intensification can occur. 6. 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; 7. Provides people with access to a network of spaces within urban environments for open space and recreation; 8. Supports the transition of the Special Purpose Zone (Kāinga Nohoanga) to a unique mixture of urban and rural activities reflecting the aspirations of Te Ngai Tūāhuriri Rūnanga; 	<p>The proposal is considered consistent with this Strategic Direction, as the development will be consolidated and integrated with the existing urban environment, being a connection to the existing rural residential development to the south-west. The proposal will remain consolidated by the barrier that the NZTA designation will provide between the urban environment and the rural environment further east, preventing further expansion outwards.</p> <p>The development recognises and seeks to maintain the existing character and amenity values of the rural environment in this location.</p> <p>As per the infrastructure evidence of Mr McLeod, the development is able to utilise and connect to the Council’s existing reticulated infrastructure. The proposal will provide for the range of housing opportunities sought, through the provision of additional rural residential. It will continue to support the hierarchy of urban centres within the Waimakariri District. The ODP demonstrates the connectivity provided for the rezoning, including active connectivity through the site and to the surrounds. With respect to point (9) of this Strategic Direction, the opportunity for LLRZ is not identified in this area notwithstanding, per the above, the proposal is considered to support the consolidated urban form.</p>

<p>9. Provides limited opportunities for Large Lot Residential development in identified areas, subject to adequate infrastructure; and</p> <p>10. Recognise and support Nga Tūāhuriri cultural values through the protection of sites and areas of significance to Māori identified in SASM-SCHED1.</p>									
<p>UFD – URBAN FORM AND DEVELOPMENT</p> <p>UFD-O1 Feasible development capacity for residential activities Sufficient feasible development capacity for residential activity to meet specified housing bottom lines and a changing demographic profile of the District as follows:</p> <table border="1" data-bbox="206 663 1104 916"> <thead> <tr> <th data-bbox="206 663 400 772">Term</th> <th data-bbox="400 663 667 772">Short to Medium (2018-2028)</th> <th data-bbox="667 663 887 772">Long (2028-2048)</th> <th data-bbox="887 663 1104 772">30yr Time Frame (2018-2048)</th> </tr> </thead> <tbody> <tr> <td data-bbox="206 772 400 916">Housing bottom lines (development capacity)</td> <td data-bbox="400 772 667 916">6,300 residential units</td> <td data-bbox="667 772 887 916">7,100 residential units</td> <td data-bbox="887 772 1104 916">13,400 residential units</td> </tr> </tbody> </table>	Term	Short to Medium (2018-2028)	Long (2028-2048)	30yr Time Frame (2018-2048)	Housing bottom lines (development capacity)	6,300 residential units	7,100 residential units	13,400 residential units	<p>Based on the evidence of Ms Hampson, the proposal is considered necessary to achieve housing capacity within the medium term.</p>
Term	Short to Medium (2018-2028)	Long (2028-2048)	30yr Time Frame (2018-2048)						
Housing bottom lines (development capacity)	6,300 residential units	7,100 residential units	13,400 residential units						
<p>UFD-P3 Identification/location and extension of Large Lot Residential Zones In relation to the identification/location of Large Lot Residential Zone areas:</p> <ol style="list-style-type: none"> 1. New Large Lot Residential development is located in the Future Large Lot Residential Overlay which adjoins an existing large Lot Residential Zone as identified in the RRDS and is informed through the development of an ODP; 2. New Large Lot Residential development, other than addressed by (1) above, is located so that it: <ol style="list-style-type: none"> a. Occurs in a form that is attached to an existing Large Lot Residential Zone or Small Settlement Zone and promotes a coordinated pattern of development; 	<p>The location of the site is not within a Future Large Lot residential Overlay, therefore part (2) of the policy is applicable.</p> <p>The development is partially located adjacent an existing LLRZ to the south-west and will promote a coordinated pattern of development. The site is not located within an identified Development Area of Woodend which was in the FDS.</p> <p>The site is not on the direct edge of Woodend, nor on the direct edge of the identified development areas as identified in the FDS, noting that the site is partially adjoining an existing LLRZ.</p>								

<ul style="list-style-type: none"> b. Is not located within an identified Development Area of the District’s main towns of Rangiora, Kaiapoi and Woodend identified in the Future Development Strategy; c. Is not on the direct edges of the District’s main towns of Rangiora, Kaiapoi and Woodend, nor on the direct edges of these towns’ identified new development areas as identified in the Future Development Strategy; d. Occurs in a manner that makes use of existing and planned transport infrastructure and the wastewater system, or where such infrastructure is not available, upgrades, funds and builds infrastructure as required, to an acceptable standard; and e. Is informed through the development of an ODP. 	<p>The development will occur in a manner to make use of existing and planned transport infrastructure, and wastewater, refer to the evidence of Mr Gallot (Transport) and Mr McLeod (Infrastructure).</p> <p>Lastly, an ODP has been prepared for the site which shows future possible connections which can be provided to the west and south, if that land were ever to be rezoned. The ODP also provides for active movement through the site (via a pedestrian/cycle path).</p> <p>Based on this assessment, it is considered that the proposal is consistent with part (2) of the policy.</p>
<p>UFD-P10 Managing reverse sensitivity effects from new development Within Residential Zones and new development areas in Rangiora and Kaiapoi:</p> <ul style="list-style-type: none"> 1. Avoid residential activity that has the potential to limit the efficient and effective operation and upgrade of critical infrastructure, strategic infrastructure, and regionally significant infrastructure, including avoiding noise sensitive activities within the Christchurch Airport Noise Contour, unless within an existing Residential Zone. 2. Minimise reverse sensitivity effects on primary production from activities within new development areas through setbacks and screening, without compromising the efficient delivery of new development areas. 	<p>The proposed ODP and requirement for acoustic and landscape buffer, will ensure the residential activity proposed on the site will not have the potential to limit the efficient and effective operation of the strategic infrastructure (NZTA designation).</p>
<p>TRAN – TRANSPORT</p> <p>TRAN-O1 A safe, resilient, efficient, integrated and sustainable transport system 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:</p> <ul style="list-style-type: none"> 1. Is safe, resilient, efficient and sustainable for all transport modes 2. Is responsive to future needs and changing technology; 	<p>The proposal will support, and not adversely impact upon, the integrated transport system. The design of the ODP supports healthy and liveable communities and reduces dependency on private motor vehicles through the pedestrian and cycle connections.</p>

<ol style="list-style-type: none"> 3. Enables economic development, including for freight; 4. Supports healthy and liveable communities; 5. Reduces dependency on private motor vehicles, including through public transport and active transport; 6. Enables the economic, social, cultural and environmental well-being of people and communities. 	
<p>TRAN-04 Effects on activities on the transport system Adverse effects on the District’s transport system from activities, including reverse sensitivity, are avoided, remedied or mitigated.</p>	<p>The visual and acoustic buffer proposed as part of the ODP will ensure the proposal does not result in adverse effects, including reverse sensitivity, on the transport system (being the NZTA designation).</p>
<p>TRAN-P15 Effects of activities on the transport system Ensure, to the extent considered reasonably practicable, that other activities do not compromise the safe and efficient operation, maintenance, repair, upgrading or development of the transport system, including through:</p> <ol style="list-style-type: none"> 1. Managing access to the road corridor, and activities and development adjacent to road/rail level crossings, particularly where it is necessary to achieve protection of the safe and efficient functioning of the transport system, including those parts of the transport system that form part of the critical infrastructure, strategic infrastructure and regionally significant infrastructure; 2. Avoiding, remedying or mitigating adverse reverse sensitivity effects on the transport system; and 3. Providing for ease of access for service and emergency vehicles. 	<p>As per the transport evidence of Mr Gallot, the proposed rezoning will not compromise the safe and efficient operation, maintenance or development of the transport system. Mr Gallot is of the opinion that a safe access can be designed via a T-intersection at the site boundary and Gladstone Road which can provide access for service and emergency vehicles. Mr Gallot notes that whilst it would be preferable to have more than one access to the ‘site’ for the purposes of ensuring efficient access for emergency vehicles, given the scale of it this is not considered unacceptable. Lastly, mitigation proposed through the ODP will ensure any potential adverse reverse sensitivity effects on the transport system will be avoided.</p>
<p>CL – CONTAMINATED LAND</p> <p>CL-01 Contaminated Land The subdivision, use and development of contaminated land does not adversely affect people, property, and the environment</p>	<p>A PSI has been undertaken for the site, identifying previous HAIL Activities. Subject to the evidence of Ms Peacock, she considers the identified HAIL activities are not likely to preclude eventual subdivision of the land. Any effects can be managed through routine testing and remediation such that the future use of the land will not adversely affect people, property and the environment.</p>
<p>NH – NATURAL HAZARDS</p> <p>NH-01 Risk from natural hazards</p>	<p>The proposal is consistent with this objective and its associated policy NH-P4, as the setting of minimum floor levels can be undertaken at time of subdivision to manage the potential effects from the flood hazard.</p>

<p>New subdivision, land use and development:</p> <ol style="list-style-type: none"> 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; 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 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. 	
<p>NOISE – Noise</p> <p>Noise-O1 Adverse noise effects Noise does not adversely affect human health, communities, natural values and the anticipated amenity values of the receiving environment.</p> <p>Noise-P1 Minimising adverse noise effects Minimise adverse noise effects by:</p> <ol style="list-style-type: none"> 1. Limiting the noise level, location, duration, time, intensity and any special characteristics of noise generating activities, to reflect the function, character and amenity values of each zone; 2. Requiring lower noise levels during night time hours compared to day time noise levels to protect human health, natural values and amenity values of sensitive environments; 3. Requiring sound insulation, or limiting the location of noise sensitive activities where they may be exposed to noise from existing activities. 	<p>Based on the evidence of Mr Trevathan, mitigation in the form of an acoustic buffer alongside the NZTA designation can be provided to ensure noise levels on the site will be at an acceptable level. The proposal is consistent with this objective.</p> <p>With respect to the policy, the mitigation proposed in the form of the acoustic buffer will further assist towards limiting the exposure to noise across the site. Additionally, it is recognised that the PDP will require sound insulation for dwellings within 100m of the NZTA designation. The proposal is consistent with this policy.</p>
<p>Noise-O2 Reverse sensitivity effects The operation of regionally significant infrastructure and strategic infrastructure, activities within Commercial and Mixed use Zones and Industrial Zones and identified existing activities are not adversely affected by reverse sensitivity effects from noise sensitive activities.</p>	<p>As per the above comment and the evidence of Mr Trevathan, through the provision of appropriate mitigation the proposal is considered unlikely to give rise to reverse sensitivity effects. The proposal is therefore consistent with this objective and associated policy.</p>

<p>Noise-P3 Rail and roads Protect the operation of rail and road infrastructure by identifying locations where acoustic mitigation measures for any new noise sensitive activities are required.</p>	
<p>RESZ – GENERAL OBJECTIVES AND POLICIES FOR ALL RESIDENTIAL ZONES</p> <p>RESZ – O1 Residential growth, location and timing Sustainable residential growth that:</p> <ol style="list-style-type: none"> 1. Provides more housing in appropriate locations in a timely manner according to growth needs; 2. Is responsive to community and district needs; and 3. Enables new development, as well as redevelopment of existing Residential Zones. 	<p>The proposal will provide for more housing in a location that is considered appropriate, noting it is not on the direct edge of the town of Woodend, and will be connected to an existing rural-residential development. The NZTA designation along the east of the site which will assist in forming a clear barrier between the urban and rural environments.</p> <p>Based on the evidence of Ms Hampson and Mr Twiss, there is a need for this type of housing within the locality of Woodend and the Waimakariri district for the medium term, and thus the proposal is responsive to this need in a location appropriate for rural residential development.</p>
<p>RESZ-O2 Residential sustainability Efficient and sustainable use of residential land and infrastructure is provided through appropriate location of development and its design.</p>	<p>The proposal is considered an efficient and sustainable use of land that would otherwise provide for limited rural productivity potential acknowledging the effect of the NZTA designation. The location of development is considered appropriate, as the future bypass will assist in providing a clear demarcation of urban and rural land.</p>
<p>RESZ-O3 Residential form, scale, design and amenity values A form, scale and design of development that:</p> <ol style="list-style-type: none"> 1. Achieves a good quality residential environment that is attractive and functional; 2. Supports community health, safety and well-being; 3. Maintains differences between zones; 4. Manages adverse effects on the surrounding environment 	<p>The proposal will adopt the proposed LLRZ and rules, therefore ensuring a form, scale and design of development that achieves a good quality residential environment. The proposal will support community health, safety and well-being through the connections it provides, both active and vehicular. The proposal will maintain a clear difference between the surrounding RLZ, and the NZTA designation will provide a clear barrier between the urban and rural environment.</p> <p>Based on the evidence, the proposal is able to manage adverse effects on the surrounding environment such that they are acceptable.</p>

<p>RESZ-05 Housing choice Residential Zones provide for the needs of the community through:</p> <ol style="list-style-type: none"> 1. A range of residential unit types; and 2. A variety of residential unit densities. 	<p>The proposal will provide for the needs of the community through the provision of increased supply of large lot residential in Woodend, which in turn will provide for the increased range of residential unit types.</p>
<p>LLRS – Large Lot Residential Zone</p> <p>LLRZ-O1 Purpose, character and amenity values of Large Lot Residential Zone</p> <p>A high quality, low density residential zone with a character distinct to other Residential Zones such that the predominant character:</p> <ol style="list-style-type: none"> 1. Is of low density detached residential units set on generous sites; 2. Has a predominance of open space over built form; 3. Is an environment with generally low levels of noise, traffic, outdoor lighting, odour and dust; and 4. Provides opportunities for agriculture activities where these do not detract from maintaining a quality residential environment, but provides limited opportunities for other activities. 	<p>The proposal will adopt the activity and built form standards of the proposed LLRZ. As such, it will result in a development with a predominant character consistent with the outcomes sought by this objective.</p> <p>Whilst it is recognised that the NZTA designation, will result in added noise and traffic levels, based on the expert evidence provided the proposal is able to appropriately mitigate these effects. Nonetheless, the proposal will otherwise meet the goal of providing low noise, traffic and a quality residential environment within the development site itself.</p>
<p>LLRZ-P1 Maintaining the qualities and character</p> <p>Maintain the qualities and character of the Large Lot Residential Zone by:</p> <ol style="list-style-type: none"> 1. Achieving a low-density residential environment with a built form dominated by detached residential units, which other than minor residential units, are established on their own separate sites; 2. Managing the scale and location of buildings so as to maintain a sense of openness and space between buildings on adjoining sites and ensuring that open space predominates over built form on each site; 3. Ensuring the built form of all activities is consistent with the low-density residential character of the zone; and 4. Retaining the open character and outlook from sites to rural areas through managing boundary fencing including the style of fencing, their height and visual permeability. 	<p>The adoption of the proposed LLRZ provisions will ensure the development is able to maintain the qualities and character of the zone, consistent with this policy.</p>

<p>LLRZ-P3 Reverse sensitivity Minimise reverse sensitivity effects within the Large Lot Residential Zone or on an existing activity in an adjacent zone by:</p> <ol style="list-style-type: none"> 1. Requiring new activities minimise the potential for reverse sensitivity effects to occur on activities anticipated in the zone; and 2. Requiring separation distances between new activities in the Large Lot Residential Zone and existing activities in adjacent zones. 	<p>The ODP for the proposed rezoning includes a landscaped bund along the eastern boundary of the site adjacent the NZTA designation which will assist in providing a visual and acoustic buffer to the future bypass.</p>
--	--

Assessment of 'strengths and constraints' criteria of Rural Residential Development Strategy 2019

RRDS Criteria	Comment
Within high flood hazard area	An eastern part of the site is within the high flood hazard area, however this part of the site is designated to NZTA for the Woodend Bypass thus will not be developed.
Within undeveloped areas inside of the existing PIB of the District's main eastern towns	The site is outside of the existing PIB of Woodend.
On the direct edges of main towns outside of the Infrastructure Boundary thereby foreclosing more intensive long-term urban development	The site is outside of the Infrastructure Boundary, however it is connected to an existing rural-residential zone and therefore would not foreclose more intensive long-term urban development.
Not connected to existing rural residential nodes or small settlements	The site is connected to the existing rural-residential node of Copper Beach to the west.
Not able to economically connect to the network scheme for wastewater	As per the infrastructure evidence provided by Mr McLeod, the development is able to connect to the network scheme for wastewater.
Within the Christchurch International Airport Limited (CIAL) noise contour	The site is not within the CIAL noise contour.
Within areas that would compromise the operational capacity of the Rangiora Airfield.	The site is not within an area which would compromise the operational capacity of the Rangiora Airfield.