

SUMMARY STATEMENT

- 1 The Canterbury Regional Council submission was generally supportive of the notified Proposed Waimakariri District Plan provisions subject to this hearing stream. The Regional Council did, however, seek some amendments to the provisions relating to the Subdivision (Rural and Residential) chapter.
- 2 My evidence focuses on the recommendations that are important in giving effect to the Canterbury Regional Policy Statement along with relevant national direction, and to achieving the best outcomes for the rural and residential areas in the District.
- 3 I have reviewed the Section 42A reports prepared by Mr Mark Buckley and Ms Rachel McClung for the Waimakariri District Council.
- 4 All but two of the recommendations set out in the S42A reports address the matters addressed in the Regional Council's submission. My evidence therefore focusses on these two outstanding issues. These issues would be addressed by the suggested amendments as noted in Appendix 1 to my evidence in relation to SUB-O1 and SUB-P6, beyond that provided by the S42A report.
- 5 These requested amendments are in relation to:
 - a. SUB-O1, regarding the Regional Council's submission point seeking to add "environmental values" to the wording of the objective; and
 - b. SUB-P6, regarding the reference to natural hazards in requirements for outline development plans.

Objective SUB-O1

- 6 The provision as notified does give effect to the CRPS Objective 5.2.1 and Policy 5.3.1, but the requested amendment will enable the objective and policy framework of the pWDP to recognise subdivision that may be necessary to respond to environmental or climate change pressures.
- 7 The amendment would also give effect to Objective 1 and Policy 1 of the NPS-UD with regard to New Zealand having well-functioning urban environments that are resilient to the likely current and future effects of climate change.
- 8 The inclusion of environmental values in the objective would also allow for the reflection of other environmental matters that are set out through the policies that appear to intend to give effect to this objective. For example, SUB-P6 refers to any land to be set aside for "environmental or landscape protection or enhancement". In my opinion, that is not sufficiently connected to "conservation values" as referred to in

SUB-O1, and a reference to “environmental values” would enable these matters to connect the objectives and policies in this regard.

- 9 Reference to “environmental values” would enable values over and above what is simply conserving what is already in place, consistent with other provisions of national direction and the CRPS.
- 10 For these reasons, I continue to support the inclusion of “environmental values” in SUB-O1.

Policy SUB-P6

- 11 The Regional Council's submission supported this provision but requested a criterion is added requiring that any high hazard areas are avoided, and other natural hazards are addressed in accordance with Chapter 11 of the CRPS.
- 12 Currently the Outline Development Plans criteria in the pWDP does not require assessment of natural hazards or detailing how natural hazards have been addressed.
- 13 Ms McClung recommends a new clause which reads *“show how the adverse effects associated with natural hazards are to be avoided, remedied or mitigated, as appropriate.”*
- 14 I agree with the intent of Ms McClung’s recommendations, but would like to note it relies on NH-P3 in order to prevent subdivision in high hazards areas that would be inconsistent with Policy 11.3.1 of the CRPS, as reference simply to “appropriate” without context does not give effect to Policy 11.3.1. As such I propose a reference be added to make it clear to plan users that NH-P3 needs to be considered when assessing SUB-P6:
- 15 *“show how the adverse effects associated with natural hazards are to be avoided, remedied or mitigated, as appropriate, in accordance with NH-P3.”*