

**SUBMISSION ON THE WAIMAKARIRI DISTRICT COUNCIL – PROPOSED
WAIMAKARIRI DISTRICT PLAN**

To: Proposed District Plan Submission
Waimakariri District Council
Private Bag 1005
Rangiora 7440

Attention: Proposed Waimakariri District Plan Submission

By email: developmentplanning@wmk.govt.nz

Submission by: Bellgrove Rangiora Ltd

Address for service: Aurecon NZ Ltd
PO Box 1061
Christchurch 8140
Attn: Mark Allan, Director – Environment and Planning

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Phone: 03 372 7601

1. This is a submission by Bellgrove Rangiora Ltd (**BRL**) on the Proposed Waimakariri District Plan (**PWDP**) which the Waimakariri District Council notified for public consultation 18 September 2021.
2. BRL could not gain an advantage in trade competition through this submission.
3. This submission relates to the PWDP in its entirety and particularly those provisions which apply or affect the following property in eastern Rangiora owned by BRL:
 - (a) Part RS 267 and Lot 2 DP 24808 (52 Kippenberger Avenue), and Part Lot 2 DP 9976 held within Record of Title CB8B/1429; and Lot 1 DP 22674 (76 Kippenberger Avenue); (collectively referred to herein as **Bellgrove North**)
 - (b) Lot 2 394668 and Lot 2 DP 452196 held within Record of Title 577722, Lot 2 DP 12090 held within Record of Title CB474/29, and Lot 4 DP 25508 held within Record of Title CB7A/1261; (collectively referred to herein as **Bellgrove South**).

Refer to the attached image appended at **Attachment A** showing the locations of BRL's landholdings as described above.

4. BRL's submission relates to the PWDP as a whole but has a specific focus on:
 - a. Provisions for the New Development Area: North East Rangiora Development Area (NER);

- b. Provisions for the New Development Area: South East Rangiora Development Area (SER);
- c. Subdivision (SUB) provisions including those related to natural hazards (SUB R3 and SUB R4), historic heritage (HH052), residential density and esplanade reserves;
- d. Residential provisions (RESZ) namely General Residential and Medium Density Residential Zone.
- e. Commercial and Mixed-Use Zone provisions namely Local Centre Zone (LCZ); and
- f. Other provisions including Historic Heritage (HH), Transport (TRAN), Noise (NOISE), Signs (SIGN) and Designations

Background

5. BRL is a joint venture between Westpark Rangiora Ltd, MGNC Developments Ltd and Bellgrove Investments Ltd. They are owners of a total land holding area of approximately 100 ha and have plans to develop this area as a residential development known as 'Bellgrove'. BRL recognise the housing crisis New Zealand faces and the critical role local developers play in providing an adequate supply, typology and affordability in the housing stock at the local level.
6. MGNC Developments Ltd is a fully owned subsidiary of Mike Greer Homes North Canterbury Ltd (MGHNC), the directors and shareholders of which are Michael Greer, Michael Flutey, and Craig Bailey. Mike Greer Homes NZ Ltd is a majority shareholder in MGHNC. Bellgrove Investments Ltd is an investment company with 14 shareholders. The Directors of BRL are Paul McGowan, Mike Flutey and Richard McEwan.
7. The joint venture partners of BRL have a proven track record of successfully completing a range of large- and small-scale residential developments in Rangiora, North Canterbury and throughout New Zealand. For example, Paul McGowan and Mike Flutey are directors in a similar joint venture development known as Westpark Rangiora Ltd (Westpark). Westpark is a 7-stage residential development located west of Rangiora that created approximately 150 residential lots. All lots within Westpark have been sold and houses have been constructed on virtually all lots by a range of building companies including Mike Greer Homes, G J Gardner Homes, Jennian Homes and others.
8. Independently, Paul McGowan has successfully completed several smaller residential developments within Rangiora and North Canterbury over the past 17 years. Mike Flutey leads Mike Greer Homes North Canterbury Ltd (MGHNC). MGHNC is the largest home building company in the Waimakariri District and has been for the past 10 years. MGHNC builds between 100-150 houses each year in the District, which represents approximately 20% of all new builds. Mike Greer Homes NZ Ltd is a leading national housing company with a track record over 25 years of successfully completing numerous large and small residential developments throughout New Zealand involving a wide range of residential building typologies.
9. BRL is currently seeking referral under the COVID-19 Recovery (Fast-track Consenting) Act 2020 (FTCA) for Stage 1 of its proposed residential development

within Bellgrove North. BRL's Stage 1 development comprises approximately 200 residential lots, a commercial centre, 3-Waters services, roading, open space and shared path networks, restoration of ecological areas within esplanade reserves, and retention of the historic Bellgrove Farm Homestead.

10. As an experienced land developer BRL has extensive knowledge of the residential development and subdivision process, including layout, functional and aesthetic design, construction, and servicing needs to meet the needs of communities. BRL are also aware that obtaining resource consents from local authorities can have time and cost implications and create uncertainty during the development process where unnecessary regulation is imposed.

Submission

Strategic Directions and Urban Growth

11. Bellgrove are generally supportive of the objectives and policies and strategic directions of the PWDP, especially those that are supportive of enabling residential growth (including those within the Urban Form and Development Chapter).
12. BRL **support** provisions that support urban development capacity within the PWDP, such as Objective SD-02 which seeks to ensure that urban development and infrastructure is provided for as 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*, and Policy UFD-P2 which provides for *residential development in the new Residential Development Areas at Kaiapoi, North East Rangiora, South East Rangiora and West Rangiora is located to implement the urban form identified in the Future Development Strategy*.
13. In addition, BRL support Policy UFD P6 'Mechanism to release Residential Development Areas' which seeks the *release of land within the identified new development areas of Kaiapoi, North East Rangiora and South East Rangiora occurs in an efficient and timely manner via a certification process to enable residential activity to meet short to medium-term feasible development capacity and achievement of housing bottom lines*.

New Residential Development Areas

14. The PWDP introduces new residential development areas to respond to expected population growth. BRL are in general support of the identification of the North East Rangiora Development Area (relevant to Bellgrove North) and the South East Rangiora Development Area (relevant to Bellgrove South) and provisions that enable the transition from the underlying proposed Rural Lifestyle Zone to residential development, subject to a prescribed certification process. This is considered an efficient and effective way of enabling future development areas to be released with greater certainty.

15. Future residential development of the North East Rangiora and South East Rangiora Development Areas is consistent with the overarching national and regional resource management frameworks and policy direction including:
 - a. Our Space 2018-2048 (Greater Christchurch Settlement Pattern Update) (**Our Space**);
 - b. National Policy Statement on Urban Development 2020 (**NPS-UD**) (which looks to ensure development capacity within a Tier 1 Local Authority area is 'plan-enabled' and 'infrastructure ready'); and
 - c. Canterbury Regional Policy Statement (**CRPS**).

The spatial coverage of the Future Residential Areas (Development Area Overlay in the PWDP) includes the 'Future Development Areas illustrated in Map A of the Canterbury Regional Policy Statement (CRPS) and the 'Projected Infrastructure Boundary' identified as a Future Development Area in Our Space.

16. In addition to alignment with the overarching policy direction, BRL acknowledge the comprehensive development of the Outline Development Plans (previously referred to as draft structure plans, particularly the North-East Rangiora Outline Development Plan) and as a majority landholder in these areas have been involved in that structure planning process. Reflecting the level of additional work and development undertaken by BRL since input into the draft structure plan process, **Table 2 (Attachment B)** and the amendments sought to Outline Development Plans (ODP's) (**Attachment C and Attachment D**) capture a number of improvements and subtle changes BRL seek to the notified ODP's.
17. Specifically, BRL seek that the full extent of Lot 2 DP 452196 is incorporated within the South East Rangiora Development Area. The land has been held as one allotment within a single record of title since 2012 and the proposed PWDP South East Rangiora Development Area introduces an arbitrary distinction between the future rural and residential boundary (refer Figure 1 below).
18. The area in question is approximately 3ha in size (smaller than the proposed minimum 4ha allotment area for a site within the Rural Lifestyle Zone), and its usability would be severely impacted by the fracturing proposed by the South-East Rangiora Development area identification. Further, this area can readily be incorporated into the South East Rangiora Development Area (as illustrated below) and the additional land will help ensure there is sufficient short to medium-term feasible development capacity of residential zoned land at Rangiora.

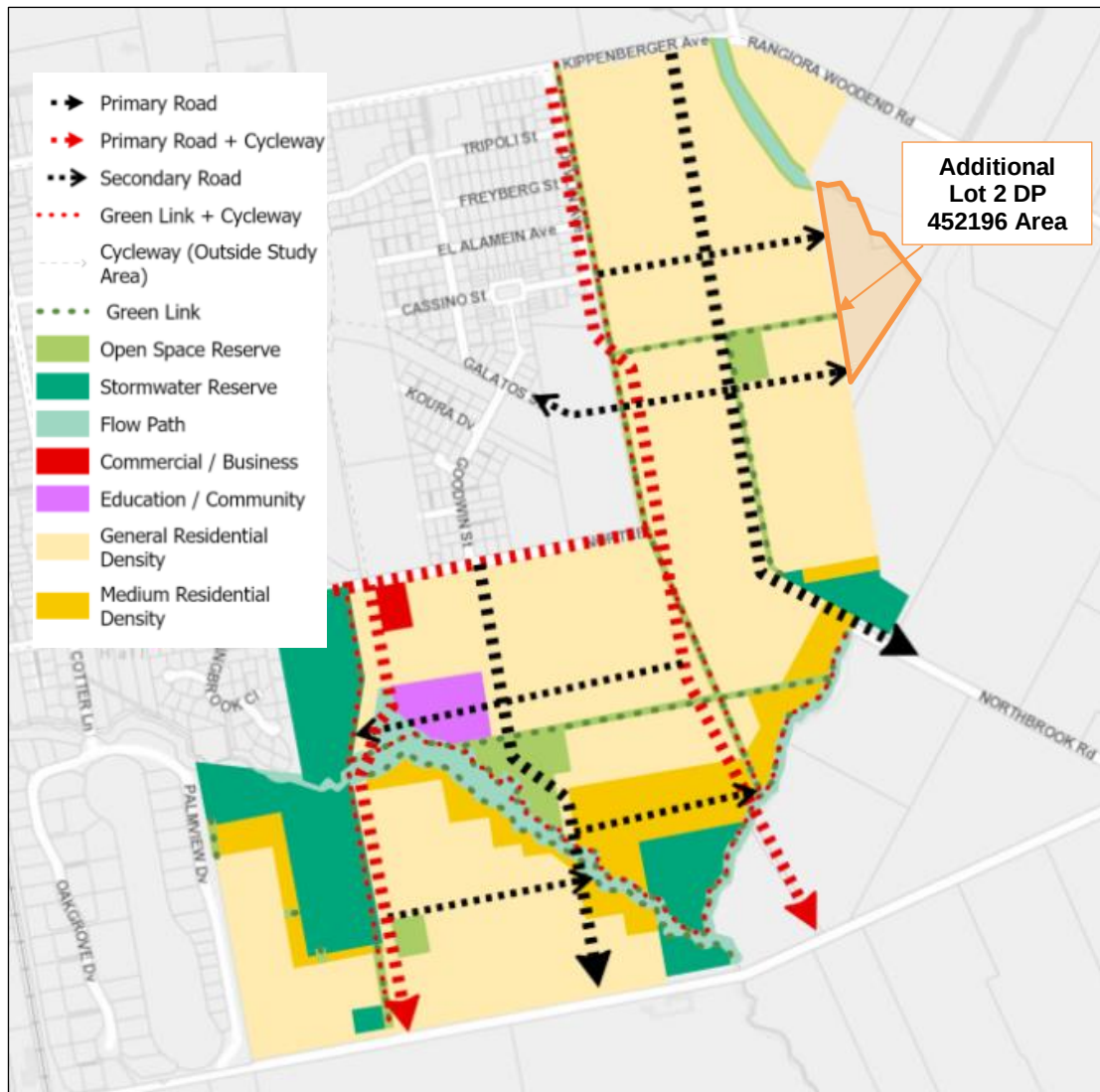


Figure 1. Proposed South East Rangiora ODP Area with excluded extent of Lot 2 DP 452196

Energy and Infrastructure - Pūngao me te hanganga hapori (EI)

19. BRL are generally supportive of the identification of the “Major Electricity Distribution Lines (66kV/33kV) and Major Electricity Distribution Setback Corridor Overlay” but seek an amendment as detailed in Attachment 2 to reflect that the lines running through 52 Kippenberger Avenue (Part RS 267) are to be decommissioned.

Transport - Ranga waka (TRAN)

20. Amendments are sought to specific transport rules as detailed in Attachment 2.

Natural Hazards - Matepā māhorahora - (NH)

21. A series of amendments are sought to the Natural Hazard provisions to help with plan interpretation and ensure that the activity status of any non-compliance with the provisions is appropriate.

Historic Heritage - Taonga o onamata (HH)

22. BRL seek that the extent of the heritage area for HH052 (Belgrove Farmhouse) be modified to reflect the changes proposed as part of the BRL's Stage 1 development, and amendments to the matters of discretion.

Sites and Areas of Significance to Māori - Ngā whenua tapu o ngā iwi – (SASM)

BRL seek that the Nga Wai overlay classification of the Rakahuri River (incl. tributaries) (SASM025) not extend into the Bellgrove North site where it has only been identified as an overland flow path (referred to as the Northern Flow Channel). This is consistent with the ecological survey and assessment undertaken in support of the Bellgrove Stage 1 consent application. Amendments are also sought to some of the Nga Wai rule provisions (fencing, earthworks and land disturbance) as detailed in Attachment 2

Natural Character of Freshwater Bodies - Āhuetanga o te awa – (NATC)

23. BRL seek that the extent of the Cam/Ruataniwha River scheduled as a Natural Character Freshwater Body 20m is reduced so that it doesn't extend west of the existing Bellgrove homestead. This is consistent with the ecological assessment and other site-specific investigations completed to date by BRL.

Subdivision SUB - Wāwāhia whenua (SUB)

24. BRL support the proposed policy detailing cost sharing arrangements related to achieving integrated and comprehensive infrastructure within a subdivision (Policy SUB P8). BRL seek amendments to aspects of the subdivision provisions including those relating to natural hazards (SUB R3 and SUB R4), historic heritage (HH052), residential density and esplanade reserve provision, as detailed in Attachment 2.

Noise - Te orooro - NOISE

25. BRL seek amendments to Rule Noise R16 requiring any new residential unit or minor residential unit within 80m of an arterial road be designed and constructed to achieve a specified minimum external and internal noise reduction to any habitable room. BRL seek amendments to reduce the extent of proposed rule coverage and the provision of alternative compliance pathways that do not require the engagement of an acoustic engineer.

Signs - Ngā tohu – (SIGN)

26. BRL oppose the overly restrictive proposed subdivision signage provisions, specifically the requirement that any subdivision development entrance sign, irrespective of size or style, requires resource consent as a non-complying activity.

Residential Zones – Whaitua Nohonoho – (RESZ)

27. Attachment 2 details support and opposition to the proposed residential provisions (RESZ), namely those concerning the General Residential and Medium Density Residential Zones. Submission points are made in relation to policies, activity standard rules and the proposed bulk form standards.

Commercial and Mixed Use Zones- Whaitua Arumoni (CMUZ)

28. BRL support the proposed role of Local Centres, which the commercial lot in Bellgrove North will be zoned following certification given it will *'provide for a range of activities to meet the daily/weekly shopping needs of residential or nearby rural areas'*. Amendments are sought to bulk form standards and the maximum ground floor area for food and beverage outlets within this zone.

Designations - Tautapa

29. BRL support the Rangiora East Road Connection proposed designation (WDC 47) but seek amendments to the supporting documentation to accurately reflect the indicative alignment for the wider Rangiora Eastern Link within Bellgrove North, as detailed in Attachment 2.

Summary

30. Additional flexibility and provision for residential development must be provided within the PWDP through the adoption of provisions that will deliver sufficient, feasible, certain, plan-enabled land development capacity for residential use. It is important that the PWDP is responsive to the variability of urban development capacity within the lifetime of the plan, to ensure the housing and servicing needs of residents in the intended catchment are reliably and sustainably met. The identification of the new Development Areas and proposed certification process assists with this.
31. Changes are sought in response to additional work undertaken by BRL since input into the draft structure plan process. These changes will increase certainty in investment for development within these areas, achieve clarity in provisions and ensure unintended consequences are avoided.

Relief sought

32. BRL seek the following decision:
- (a) That the PWDP be rejected in its current form; or
 - (b) That the provisions be amended to reflect the issues raised in this submission; and/or
 - (c) Such other relief as may be required to give effect to this submission, including alternative, consequential or necessary amendments to the PWDP that address the matters raised by BRL.
33. BRL wishes to be heard in support of this submission.

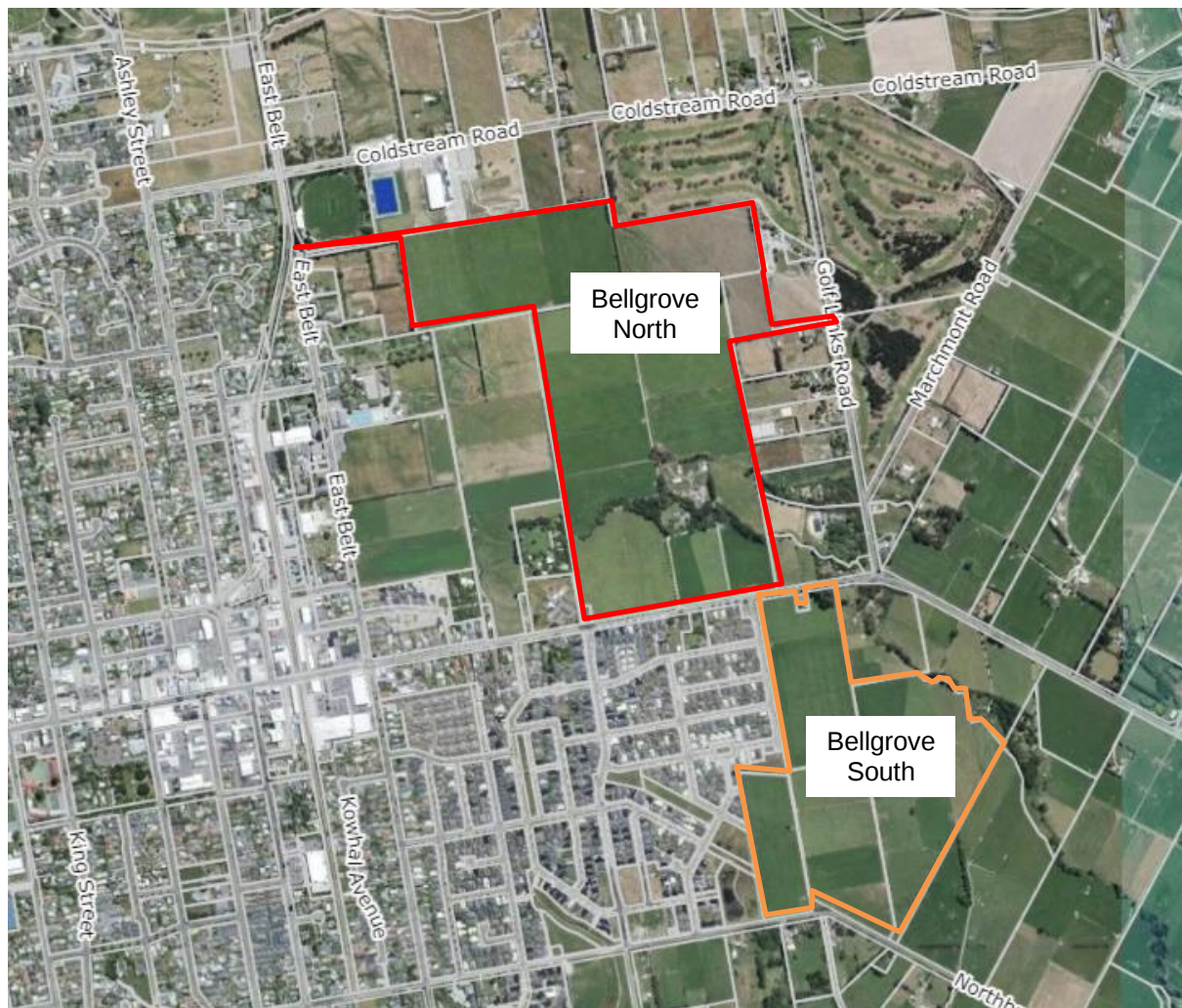
Date: 26 November 2021

A handwritten signature in black ink, appearing to be 'M Allan', written in a cursive style.

M Allan

on behalf of Bellgrove Rangiora Ltd

Attachment 1: BRL Property Location Plan



Address	Legal Description	Record of Title	Area (ha)
Bellgrove North			
52 Kippenberger Avenue	Part RS 267	CB8B/1429	40.59
	Lot 2 DP 24808		1.86
N/A	Part Lot 2 DP 9976		20.46
76 Kippenberger Avenue	Lot 1 DP 22674	CB3C/987	0.10
<i>Total Bellgrove North Area</i>			63.01
Bellgrove South			
N/A	Lot 2 DP 394668	577722	8.79
N/A	Lot 2 DP 452196		14.21
N/A	Lot 2 DP 12090	CB474/29	8.20
100 Northbrook Road	Lot 4 DP 25508	CB7A/1261	4.59
<i>Total Bellgrove South Area</i>			35.79
Total BRL Landholding			98.8

Attachment 2: Submission Table

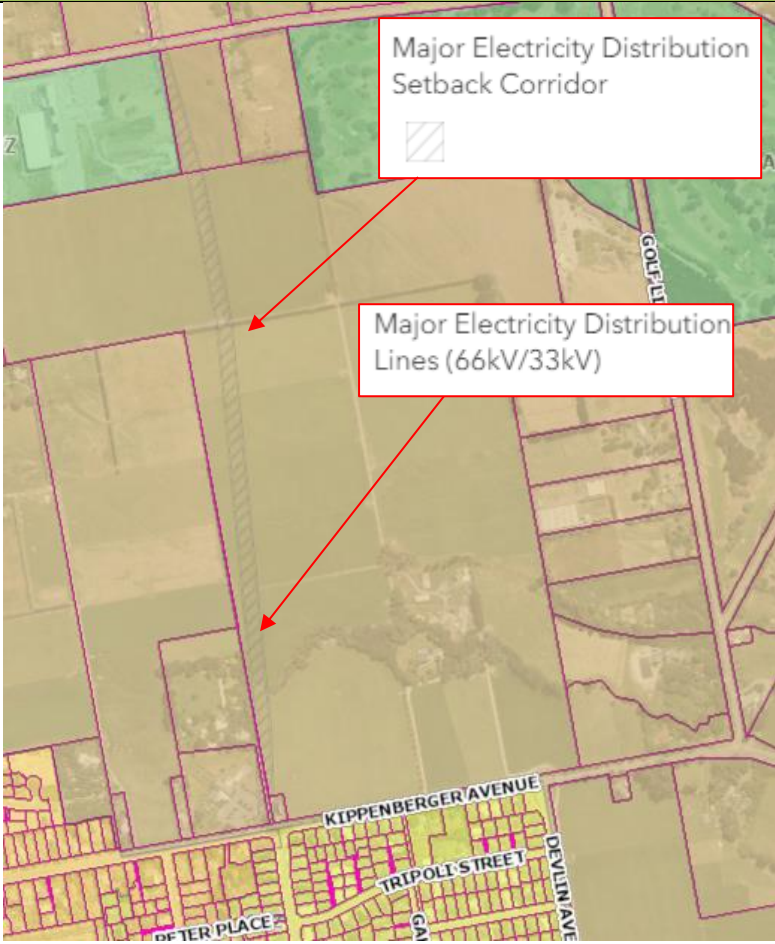
The following submission table outlines the PWDP provision to which the submission point relates, provides comment on the reasoning for the submission and outlines the relief sought. Provisions are submitted on in the order that they appear in the PWDP.

Provisions	Notified Provision	Comment	Relief Sought								
Strategic Directions - Rautaki ahunga -(SD)											
Objective - SD-O2 Urban Development	<i>Urban development and infrastructure that:</i> <i>is consolidated and integrated with the urban environment;</i> <i>that recognises existing character, amenity values, and is attractive and functional to residents, businesses and visitors;</i> <i>utilises the District Council's reticulated wastewater system, and potable water supply and stormwater infrastructure where available;</i> <i>provides a range of housing opportunities, focusing new residential activity within existing towns, and identified development areas in Rangiora and Kaiapoi, in order to achieve the housing bottom lines in UFD-O1;</i> <i>supports a hierarchy of urban centres, with the District's main centres in Rangiora, Kaiapoi, Oxford and Woodend being:</i> <i>the primary centres for community facilities;</i> <i>the primary focus for retail, office and other commercial activity; and</i> <i>the focus around which residential development and intensification can occur.</i> <i>provides opportunities for business activities to establish and prosper within a network of business and industrial areas zoned appropriate to their type and scale of activity and which support district self-sufficiency;</i> <i>provides people with access to a network of spaces within urban environments for open space and recreation;</i> <i>supports the transition of the Special Purpose Zone (Kāinga Nohoanga) to a unique mixture of urban and rural activities reflecting the aspirations of Te Ngāi Tūāhuriri Rūnanga;</i> <i>provides limited opportunities for Large Lot Residential development in identified areas, subject to adequate infrastructure; and</i> <i>recognise and support Ngāi Tūāhuriri cultural values through the protection of sites and areas of significance to Māori identified in SASM-SCHED1.</i>	Support BRL generally support the strategic directions of the PWDP and specifically support the focus of future growth within the identified areas in Rangiora (North-East Rangiora and South-East Rangiora Development Areas).	Retain as notified								
Urban Form and Development - Āhuatanga auaha ā tāone (UFD)											
Objective - UFD-01 Feasible development capacity for residential activities	<i>Sufficient feasible development capacity for residential activity to meet specified housing bottom lines and a changing demographic profile of the District as follows:</i> <table border="1"> <thead> <tr> <th>Term</th><th>Short to Medium Term (2018-2028)</th><th>Long Term (2028-2048)</th><th>30 Year Time frame (2018-2048)</th></tr> </thead> <tbody> <tr> <td>Housing Bottom Lines (Development Capacity)</td><td>6,300 Residential Units</td><td>7,100 Residential Units</td><td>13,400 Residential Units</td></tr> </tbody> </table>	Term	Short to Medium Term (2018-2028)	Long Term (2028-2048)	30 Year Time frame (2018-2048)	Housing Bottom Lines (Development Capacity)	6,300 Residential Units	7,100 Residential Units	13,400 Residential Units	Support BRL support the PWDP being responsive to housing demand and development capacity, implemented by enabling provisions that avoid unnecessary consenting processes and consequential delays / costs / uncertainty for development.	Retain as Notified
Term	Short to Medium Term (2018-2028)	Long Term (2028-2048)	30 Year Time frame (2018-2048)								
Housing Bottom Lines (Development Capacity)	6,300 Residential Units	7,100 Residential Units	13,400 Residential Units								
Policy - UFD-P1 Density of residential development	<i>In relation to the density of residential development:</i> <i>provide for intensification in urban environments through provision for minor residential units, retirement villages, papakāinga or suitable up-zoning of Residential Zones where it is consistent with the anticipated built form and purpose of the zone;</i>	Support BRL support the PWDP enabling a range of housing types and densities within Residential Zones. BRL also support the	Retain as Notified								

	2. locate any Medium Density Residential Zone so it: a. supports, and has ready access to, existing Commercial and Mixed Use Zones, schools, public transport and open space; b. supports well connected walkable communities; c. avoids or mitigates natural hazard risk in any high hazard area within existing urban areas; and d. located away from any Heavy Industrial Zone.	provision of medium density residential areas where they are located in proximity to commercial areas, schools, public transport and open space.	
Policy - UFD-P2 Identification/location of new Residential Development Areas	<i>In relation to the identification/location of residential development areas:</i> 1. residential development in the new Residential Development Areas at Kaiapoi, North East Rangiora, South East Rangiora and West Rangiora is located to implement the urban form identified in the Future Development Strategy; 2. for new Residential Development Areas, other than those identified by (1) above, avoid residential development unless located so that they: a. occur in a form that concentrates, or are attached to, an existing urban environment and promotes a coordinated pattern of development; b. occur in a manner that makes use of existing and planned transport and three waters infrastructure, or where such infrastructure is not available, upgrades, funds and builds infrastructure as required; 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; d. concentrate higher density residential housing in locations focusing on activity nodes such as key activity centres, schools, public transport routes and open space; e. take into account the need to provide for intensification of residential development while maintaining appropriate levels of amenity values on surrounding sites and streetscapes; f. are informed through the development of an ODP; g. supports reductions in greenhouse gas emissions; and h. are resilient to natural hazards and the likely current and future effects of climate change as identified in SD-O6.	Support BRL generally support the strategic directions of the PWDP (including UPD-P2) which references the identification and location of future residential development areas (including the North-East Rangiora and South-East Rangiora Development Areas). It also supports the flexibility for other areas outside of those identified residential area to be developed where they occur in a form that is concentrated, or attached to, an existing urban environment and promotes a coordinated pattern of development (UFD-P2 (2)).	Retain as Notified
Policy UFD-P6 Mechanism to release Residential Development Areas	<i>The release of land within the identified new development areas of Kaiapoi, North East Rangiora and South East Rangiora occurs in an efficient and timely manner via a certification process to enable residential activity to meet short to medium-term feasible development capacity and achievement of housing bottom lines.</i>	Support BRL support the provision to enable the transition from the underlying proposed Rural Lifestyle Zone to residential development, subject to a prescribed certification process. This is an efficient, and effective way of enabling future development areas to be released without the need for separate and potentially lengthy, costly and uncertain plan change processes.	Retain as Notified

Policy UFD-P10 Managing reverse sensitivity effects from new development	<i>Within Residential Zones and new development areas in Rangiora and Kaiapoi:</i> <i>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;</i> <i>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.</i>	Support BRL support the acknowledgement that within identified future development areas there may be reverse sensitivity effects associated with the transition of rural to urban land, and the need to balance this “without compromising the efficient delivery of new development areas” within this policy framework. This aligns with Objective UFD-01 to achieve residential development capacity within the district.	Retain as Notified
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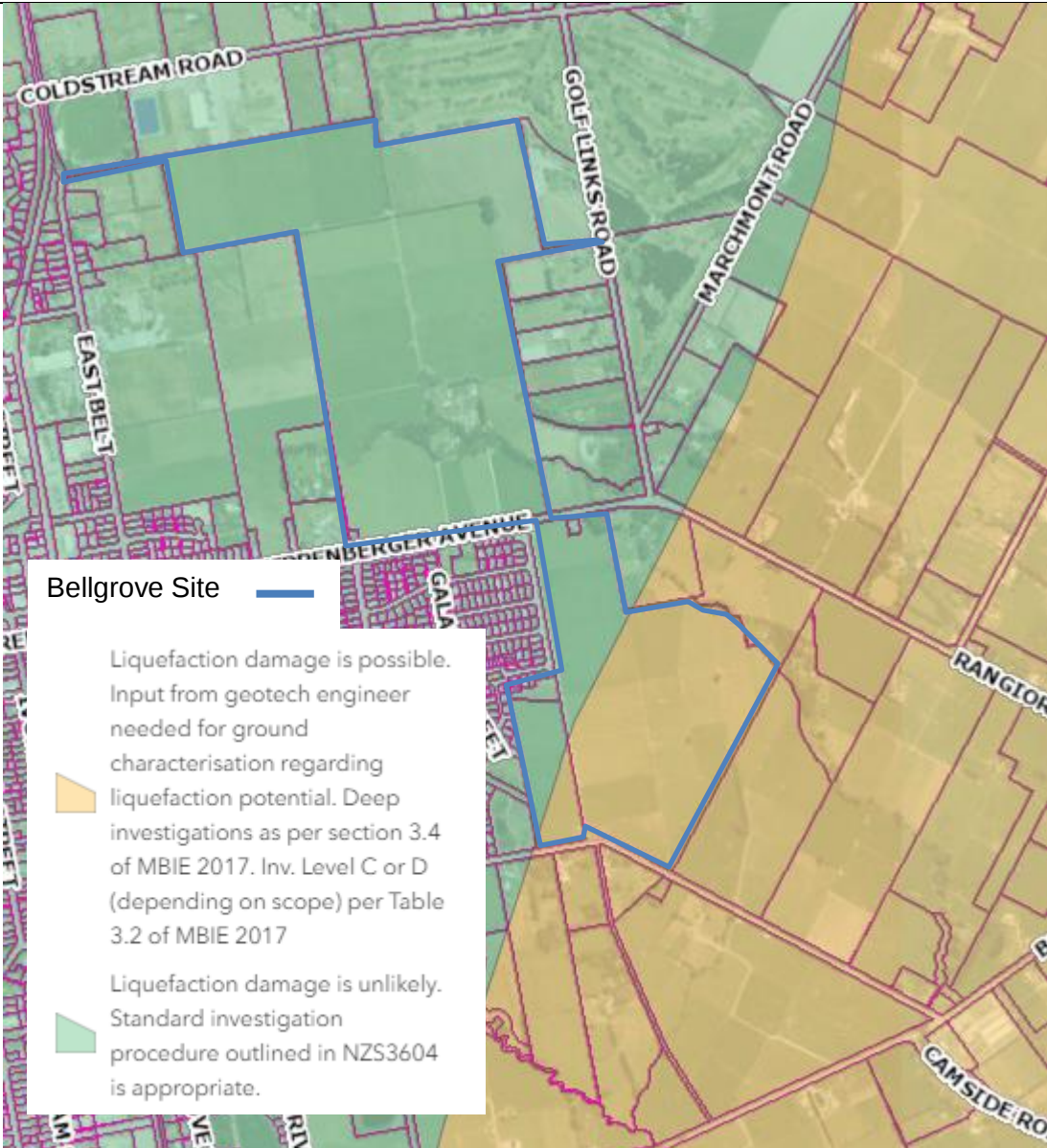
Energy and Infrastructure – Pūngao me te hanganga hāpori (EI)

Major Electricity Distribution Lines (66kV/33kV) Major Electricity Distribution Setback Corridor Overlay	 Figure 2. Major Electricity Distribution Overlays of the PWDP	Oppose The Major Electricity Distribution Line Overlay (66kV/33kV) and the Major Electricity Distribution Setback Corridor are shown within the North East Rangiora Development Area (running along the eastern boundary of Part RS 267 (52 Kippenberger Avenue)). MainPower have confirmed to BRL that this line will be decommissioned (abandoned and removed) in its entirety through Bellgrove North (refer to the Attachment 6).	Remove the major electricity distribution corridor and distribution line shown through Bellgrove North (removing a requirement for assessment against Rule EI-R54 ‘Earthworks adjacent to a 66kV or 33kV electricity distribution line’ and Rule EI-R56 ‘Activities and development (other than earthworks or network utilities) adjacent to a 66kV or 33kV electricity distribution line’).
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Transport - Ranga waka (TRAN)

Rule: TRAN-R6 - Formation of a new vehicle accessway	<i>The formation of a new vehicle accessway is permitted where:</i> <i>1. any activity that includes the formation of a new vehicle accessway shall comply with the design standards for new vehicle accessways in TRAN-S4 below;</i> <i>2. any new vehicle accessway that serves three or more sites shall achieve the minimum sight lines for pedestrian safety by way of a visibility splay as shown in Figure TRAN-4; and</i>	Oppose Vehicle accessway is defined in the PWDP as ‘any area of land the primary purpose of which is to provide access, including vehicle access, between the body of any allotment(s) or site(s) and any vehicle crossing.	Amend TRAN R6 to include a visibility splay requirement for residential land use vehicle accessways to allow clear visibility above 1 metre within a triangle measured for a width of at least 1.5 metres either side of the entrance, and for a length at least 2 metres measured
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	3. in the circumstances specified in (a) and (b) below, a new vehicle accessway shall be designed to the standard of a new road as per Table TRAN-3 or Table TRAN-4, with the applicable standard based on the posted speed limit of the road with which the accessway will connect: a. where any new vehicle accessway in Residential Zones or Rural Zones will serve six or more sites; or b. where vehicle movements on any new accessway will exceed 100 per day. FIGURE TRAN-4: Accessway visibility splay to achieve minimum sight lines for pedestrian safety	Accessway includes any rights of way, private way, access lot, access leg or private road’. Figure TRAN-4 shows a very large visibility splay requirement (2.0m x 2.5m triangle visibility splay) which while appropriate for commercial or industrial accesses, is considered oversized and too large for residential right of ways/access legs While the requirement to provide visibility splays is only triggered for residential accessways where a vehicle accessway serves three or more sites, it would be appropriate to differentiate between the required visibility splay for commercial / industrial land use and residential. Such an approach would be consistent with the Christchurch District Plan (CDP) which only requires a large visibility splay such as that shown in Figure TRAN-4 where a vehicle access serves more than 15 car parking spaces or more than 10 heavy vehicle movements (irrespective of the land use). The CDP outlines smaller visibility splay requirements for vehicle accesses servicing residential activity with less than 15 car parks. BRL consider more specific visibility splay requirements are required that acknowledge the different types of land use and consequential number of movements from proposed vehicle accesses, rather than a blunt approach which has the potential to be overly onerous, and unnecessary, in respect of new residential accessways.	from the road boundary (consistent with the CDP).
Natural Hazards - Matepā māhorahora - (NH)			
Liquefaction Overlay	Bellgrove is located within both the Liquefaction Overlay (damage unlikely) and the Liquefaction Overlay (potential damage) as shown by Figure 3.	Oppose In Part The overlay maps are unclear as currently presented. Greater clarity should be given to show that when a site is classified as ‘Liquefaction Damage is Unlikely’ it is still within the liquefaction overlay and that the associated rules in the plan apply.	Modify the Liquefaction Overlays to be: Liquefaction Overlay 1: Liquefaction damage unlikely Liquefaction Overlay 2: Liquefaction damage is possible.

	 Figure 3. Liquefaction Overlay of the PWDP		
Rule SUB-R3 Subdivision within the Liquefaction Overlay	<i>Controlled where:</i> <i>a building platform is identified on the subdivision plan; and</i> <i>SUB-S1 to SUB-S18 are met</i>	Oppose Building platform is defined as “a delineated area on a subdivision plan: <i>outside of which the location of structures on an allotment is not allowed;</i> <i>which is the subject of a condition of subdivision consent, to be complied with on a continuing basis; and</i> <i>is recorded and issued in a consent notice in accordance with s221 of the Resource Management Act 1991.”</i> Rule SUB-R3 is drafted in such a way that requires building platforms to be identified for each proposed future allotment. Without the inclusion of building platforms on a	Rule SUB-R3 should be modified such that a non-compliance (no specific building platform identification) is a controlled or restricted discretionary activity (not non-complying) with control / discretion restricted to matters relating to the location, siting and layout, design of buildings, services or foundations as they relate to the liquefaction hazard; earthworks as they relate to the liquefaction hazard; and any liquefaction hazard remediation methods.

		subdivision plan under the PWDP a subdivision would be non-complying (even when all other subdivision standards are met, or when geotechnical advice does not specify the need to identify a building platform.	
Rule NH-R2 Non-Urban Flood Assessment Overlay Rural Zones	<i>Natural Hazard Sensitive Activities are permitted where:</i> <i>1. the building is erected to the level specified in an existing consent notice that is less than five years old; or</i> <i>2. if located within the Non-Urban Flood Assessment Overlay, the building:</i> <i>a. is not located on a site within a high flood hazard area as stated in a Flood Assessment Certificate issued in accordance with NH-S1; and</i> <i>b. has a finished floor level equal to or higher than the minimum finished floor level as stated in a Flood Assessment Certificate issued in accordance with NH-S1; and</i> <i>c. is not located within an overland flow path as stated in a Flood Assessment Certificate issued in accordance with NH-S1; or</i> <i>3. if the activity is a residential unit or a minor residential unit and is located outside of the Non-Urban Flood Assessment Overlay and located within Rural Zones, it has a finished floor level that is either:</i> <i>a. 400mm above the natural ground level; or</i> <i>b. is equal to or higher than the minimum finished floor level as stated in a Flood Assessment Certificate issued in accordance with NH-S1.</i> <u>NH-S1 Flood Assessment Certificate</u> <i>The District Council will issue a Flood Assessment Certificate (which will be valid for three years from the date of issue) that specifies:</i> <i>a. whether the activity is located on a site that is within a high flood hazard area; and</i> <i>b. whether the activity is located within an overland flow path; and</i> <i>c. where the activity is located on land that is within the Urban Flood Assessment Overlay, the minimum finished floor level in accordance with (e); or</i> <i>d. where the activity is located on land that is within the Non-Urban Flood Assessment Overlay and is located on land that is outside of a high flood hazard area, the minimum finished floor level in accordance with (e); and</i> <i>e. the minimum finished floor level shall be calculated as the highest of the following:</i> <i>i. flooding predicted to occur in a 0.5% AEP (1 in 200-year) Localised Rainfall Event plus up to 500mm freeboard; or</i> <i>ii. flooding predicted to occur in a 0.5% AEP (1 in 200-year) Ashley River/Rakahuri Breakout Event concurrent with a 5% AEP (1 in 20-year) Localised Rainfall Event plus up to 500mm freeboard; or</i> <i>iii. flooding predicted to occur in a 1% AEP (1 in 100-year) Storm Surge Event concurrent with a 5% AEP (1 in 20-year) River Flow Event with sea level rise based on an RCP8.5 climate change scenario, plus up to 500mm freeboard.</i>	Oppose When Bellgrove is rezoned from rural to residential as part of the certification process enabled for new development areas, the District Plan will need to ensure that the current 'Non-Urban Flood Overlay provisions' will apply to the new residential zoned land (which would typically be within the 'Urban Flood Assessment Overlay and subject to Rule NH-R1 instead of Rule NH R2). NH-S1 specifies the flood assessment certificate process. This requires a minimum 500mm freeboard above flooding predicted to occur for each of the three flooding scenarios identified in (c). However, in areas of very low to low flood hazard a default freeboard of 400mm is considered more appropriate. This is consistent with the approach taken for Bellgrove Stage 1 where the finished floor level (FFL) required for residential lots is 400mm freeboard above the 200yr flood level, except for areas of higher risk (proposed lots adjacent to open flow channels, stormwater treatment facilities and those where ponding could eventuate following blocked sump inlets) where 500mm freeboard above the 200yr flood level is required.	Ensure flood overlays and relevant provisions will be appropriately carried over following the certification process enabled by the proposed plan for new development areas. <u>Reword NH-S1 Flood Assessment Criteria to be:</u> <i>e. the minimum finished floor level shall be calculated as the highest of the following:</i> <i>i. flooding predicted to occur in a 0.5% AEP (1 in 200-year) Localised Rainfall Event plus up to 500mm freeboard; or</i> <i>ii. flooding predicted to occur in a 0.5% AEP (1 in 200-year) Ashley River/Rakahuri Breakout Event concurrent with a 5% AEP (1 in 20-year) Localised Rainfall Event plus up to 500mm freeboard; or</i> <i>iii. flooding predicted to occur in a 1% AEP (1 in 100-year) Storm Surge Event concurrent with a 5% AEP (1 in 20-year) River Flow Event with sea level rise based on an RCP8.5 climate change scenario, plus up to 500mm freeboard.</i> <i><u>f. For the purposes of determining the required freeboard in (e), any site considered to be medium risk (adjacent to a stormwater treatment facility (i.e. basin or similar) or overland flow channel) shall require a freeboard of 500mm. All other sites are considered low risk and can have a reduced freeboard of 400mm.</u></i>

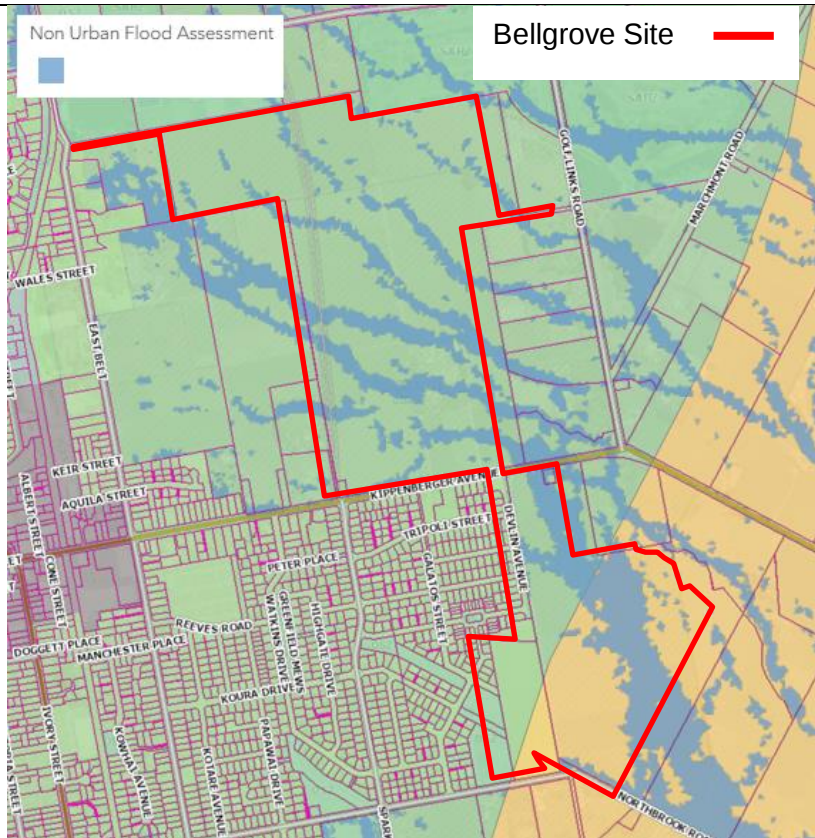
	Non Urban Flood Assessment Bellgrove Site  Figure 4. Non-Urban Flood Assessment Overlay of the pWDP																
Rule SUB-R4 Subdivision within flood hazard areas Urban Flood Assessment Overlay Non-Urban Flood Assessment Overlay	Subdivision within flood hazard areas is a restricted discretionary activity where: 1. a building platform is identified on the subdivision plan; and 2. if located with the non-urban flood assessment overlay, the building platform is not located within a high flood hazard area; and 3. if located with the coastal flood assessment overlay, the building platform is not located within a high coastal flood hazard area; and 4. SUB-S1 to SUB-S18 are met. Activity status when compliance with SUB-R4 (1) not achieved: NC Activity status when compliance with SUB-R4 (2) or SUB-R4 (3) not achieved: NC Activity status when compliance with SUB-R4 (4) not achieved: as set out in the relevant subdivision standards	Oppose Building platform is defined as “a delineated area on a subdivision plan outside of which the location of structures on an allotment is not allowed’. Rule SUB-R4 is drafted in such a way that requires building platforms to be identified for each proposed future allotment. Without the inclusion of building platforms on a subdivision plan under the PWDP a subdivision would be non-complying (even when all other subdivision standards are met).	Rule SUB-R4 should be modified such that a non-compliance with this is a controlled or restricted discretionary activity (not non-complying) with control / discretion restricted to matters relating to the location, siting and layout, design of buildings, services or foundations as they relate to the flooding hazard; earthworks as they relate to the flooding hazard; and any flood hazard remediation methods.														
Historic Heritage - Taonga o onamata (HH)																	
Heritage Item - HH052 ‘Belgrove Farmhouse’	Table 1. Extract of Historic Heritage Item Schedule HH-SCHED2 of the pWDP <table><tr><th>Heritage Item ID</th><th>Name</th><th>Address</th><th>Legal Description</th><th>Description of Item</th><th>Category</th><th>HNZPT Category & List number</th></tr><tr><td>HH052</td><td>‘Belgrove’ farmhouse</td><td>52 Kippenberger Avenue, Rangiora</td><td>Part 267 RS</td><td>Building</td><td>B = Significant</td><td>HNZPT historic place category 2, list # 1821</td></tr></table>	Heritage Item ID	Name	Address	Legal Description	Description of Item	Category	HNZPT Category & List number	HH052	‘Belgrove’ farmhouse	52 Kippenberger Avenue, Rangiora	Part 267 RS	Building	B = Significant	HNZPT historic place category 2, list # 1821	Oppose The pWDP identifies the extent of the heritage area associated with HH052 ‘Belgrove farmhouse’. The method (in the form of a circle centred on the heritage item), is arbitrary, not justified by appropriate s32 analysis, and is open to interpretation as to the criteria and relevance of the setting.	The extent of the heritage area will be modified as part of the Bellgrove’s Stage 1 development at 52 and 76 Kippenberger Avenue, Rangiora. Given the heritage area is arbitrary and a site-specific response to development around the homestead will be proposed as part of the Stage 1 application, BRL seek that the heritage area overlay for HH052 be removed. This will enable a site specific assessment to be undertaken for the area to confirm the Belgrove
Heritage Item ID	Name	Address	Legal Description	Description of Item	Category	HNZPT Category & List number											
HH052	‘Belgrove’ farmhouse	52 Kippenberger Avenue, Rangiora	Part 267 RS	Building	B = Significant	HNZPT historic place category 2, list # 1821											

	 Figure 5. Heritage Area and Heritage Building Overlays of the pWDP	The Historic Heritage Item Record for 'Belgrove Farmhouse' includes a description of the extent of the setting as being “<i>the extent of scheduling is limited to the garden setting of the house, rather than the land parcel as a whole</i>”. This provides limited context and does not outline whether the setting (shown on the aerial as over the top of existing trees) is inclusive or exclusive of trees overlain (or partially overlain) by the circle. None of the trees within or around this circle have been identified as protected under either the operative WDP or PWDP. BRL support this. In addition, the PWDP does not include any criteria focussed on evaluating a scheduled setting or open space around a heritage item	setting and ensure that the ‘area’ extent does not fall down on any newly created residential lots surrounding the homestead. Include criteria focussed on evaluating a scheduled setting or open space around a heritage item.
Rule Sub-R7 Subdivision of a site containing a historic heritage item or heritage setting, or notable tree	<i>Subdivision of a site containing a historic heritage item or heritage setting, or notable tree is a restricted discretionary activity where:</i> <i>SUB-S1 to SUB-S18 are met.</i> <u>Matters of discretion are restricted to: Matters of control/discretion listed in SUB-R2 ‘SUB-MCD13 - Historic heritage and notable trees’</u> <i>Any effect on historic heritage and on any associated heritage setting.</i> <i>The extent that HNZPT has been consulted and the outcome of that consultation.</i> <i>The extent that the site has cultural or spiritual significance to mana whenua and the outcome of any consultation undertaken with Te Ngāi Tūāhuriri Rūnanga.</i> <i>Opportunities to enhance the physical condition of the historic heritage and its heritage values.</i> <i>Any mitigation measures are proposed to be implemented to protect the historic heritage.</i> <i>The extent to which the subdivision layout and design provides for the protection of any notable tree or trees.</i> <i>Any effect on a notable tree as a result of the subdivision or building platform, and whether alternative methods or subdivision design are available to retain or protect the tree.</i>	Oppose in Part Subdivision of land involving a site where a heritage resource listed in Appendix 28.1 is also a restricted discretionary under the operative WDP. The difference being that the matters of discretion include (i) ‘<i>whether the retention of the heritage features or form of the listed structure, place, or object causes significant additional costs, or reduction in its range of likely uses</i>’. This provision has not been retained in the PWDP and should be included given cost considerations are a major component of land development and subdivision of surrounding land does alter the context of a heritage item (particularly when the planned transition is from rural to residential) and this has the potential to impact its range of likely uses. In addition, the PWDP does not include any criteria focussed on evaluating a scheduled setting or open space around a heritage item.	Amend the Matters of Discretion in <u>SUB-MCD13</u> to include: <u>8. whether the retention of the heritage features or form of the listed structure, place, or object causes significant additional costs, or reduction in its range of likely uses</u> Amend the Matters of Discretion in <u>SUB-MCD13</u> to refer to matters which an assessment of impacts on heritage settings should consider. Suggested wording is: <u>9. for new buildings, structures, alterations and/or features within a heritage setting, whether they will:</u> <u>a. be compatible with the heritage fabric, values and significance of the heritage item including design, detailing and location of heritage item(s) within the setting;</u> <u>ii. impact on views to or from the heritage item(s), and any reduction in the visibility of heritage item(s) from public places; and</u> <u>iii. significantly compromise the relationship between elements, such as the layout and orientation, form, and materials within the setting.</u>

Sites and Areas of Significance to Māori - Ngā whenua tapu o ngā iwi – (SASM)

Ngā Wai Overlay

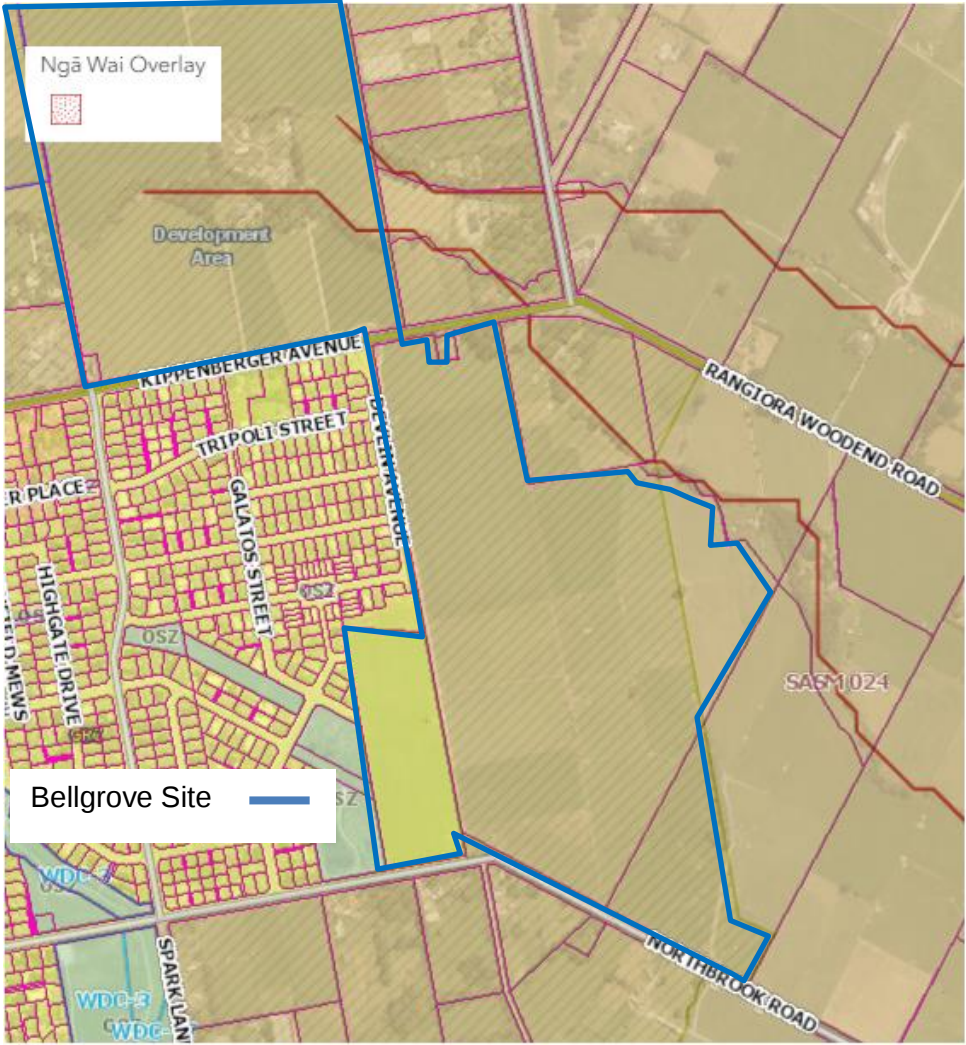


Figure 6. Nga Wai Overlay of the pWDP

SASM ID	Classification	Sub-class	Location/Name	Description
SASM024	Ngā Wai	Awa/ngā manga	Cam/Ruataniwha (incl. tributaries)	River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species
SASM025	Ngā Wai	Awa/ngā manga	Rakahuri (incl. tributaries)	River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species

Oppose

The Nga Wai overlay classification of the Rakahuri River (incl. tributaries) (SASM025) should not extend into the Bellgrove North site where it has only been identified as an overland flow path (referred to as the Northern Flow Channel). This is consistent with the ecological survey and assessment undertaken in support of the Bellgrove Stage 1 consent application which has found that the Northern Flow Channel is dry (**Attachment E**).

Aquatic Ecology Limited (AEL) notes regarding the Northern Flow Channel ‘It is clear this swale contains water very infrequently, and its function for aquatic ecology is very limited. The swale is not marked as a waterway on Canterbury Maps and permanent surface water may not exist for at least 1.5 km down-gradient’.

While the Cam / Ruataniwha River extent is consistent with that shown for a waterway on Environment Canterbury’s GIS Mapping Tool ‘Canterbury Maps’ it also does not have any permanent aquatic habitat other an ornamental pond immediately north of the Bellgrove Homestead.

Modify the extent of SASM025 Rakahuri (incl. tributaries) so that it does not extend into Bellgrove North (52 Kippenberger Avenue / Part RS 267).

Rule SASM-R1
Maintenance of an Existing Fence

The maintenance of an existing fence, the extent and/or volume of land disturbance is limited to that necessary to replace existing fence posts in the existing post hole along its existing alignment.

Works that do not comply are restricted discretionary.

Oppose

Rule SASM-R1 applies to Ngā Wai waterways identified in the PWDP and consequently applies to SASM024 and SASM025 identified above.

It is unclear if this rule only relates to fences within the waterway (between bank to bank),

Clarify in Rule SASM R1 the extent from a Nga Wai waterway in which any fencing would be captured by this provision.

		or if there is a setback distance from the top of bank to which it applies. For Bellgrove North this specification would be of assistance to ensure that the provision would only apply to fencing located within the proposed esplanade reserve area for the Cam/Ruataniwha River, and fencing associated with the proposed residential lots is not unintentionally impacted by this provision (noting that any new fence outside of this area will not have any adverse impacts).	
Rule SASM-R4 Earthworks and land disturbance associated with other activities	<i>Earthworks and land disturbance associated with other activities are permitted where:</i> 1. <i>the earthworks and land disturbance is limited to:</i> a. <i>planting of trees;</i> b. <i>gardening;</i> c. <i>building foundations, septic tank and swimming pool installations where the combined volume of earthworks is 350m³ or less;</i> d. <i>freestanding sign foundations to a maximum depth of 200mm or to the depth already disturbed (whichever is the greater);</i> e. <i>drain and track maintenance;</i> f. <i>cultivation, stopbanks, roadworks and other activities within land previously disturbed by previous earthworks to the depth already disturbed;</i> g. <i>cultivation to a maximum depth of 200mm;</i> h. <i>a customer connection between a building, other structure, site, and infrastructure as per EI-R4; and</i> i. <i>the drilling of a well or bore.</i> <i>Works that do not comply with 1 are restricted discretionary.</i>	Oppose Rule SASM-R4 applies to Ngā Wai waterways identified in the PWDP and consequently applies to SASM024 and SASM025 identified above. As with Rule SASM-R1 this rule does not clarify the distance from the waterway that earthworks and land disturbance are captured by this rule. For example, it should be clarified that this rule would only apply to works within the ‘banks’ of a Ngā Wai waterway and not those adjacent to or within a given setback from the banks.	Clarify in Rule SASM R4 the extent from a Ngā Wai waterway in which any earthwork and land disturbance would be captured by this provision.

Natural Character of Freshwater Bodies - Āhuatanga o te awa – (NATC)

Scheduled Natural Character Freshwater Bodies Schedule 2 Overlay

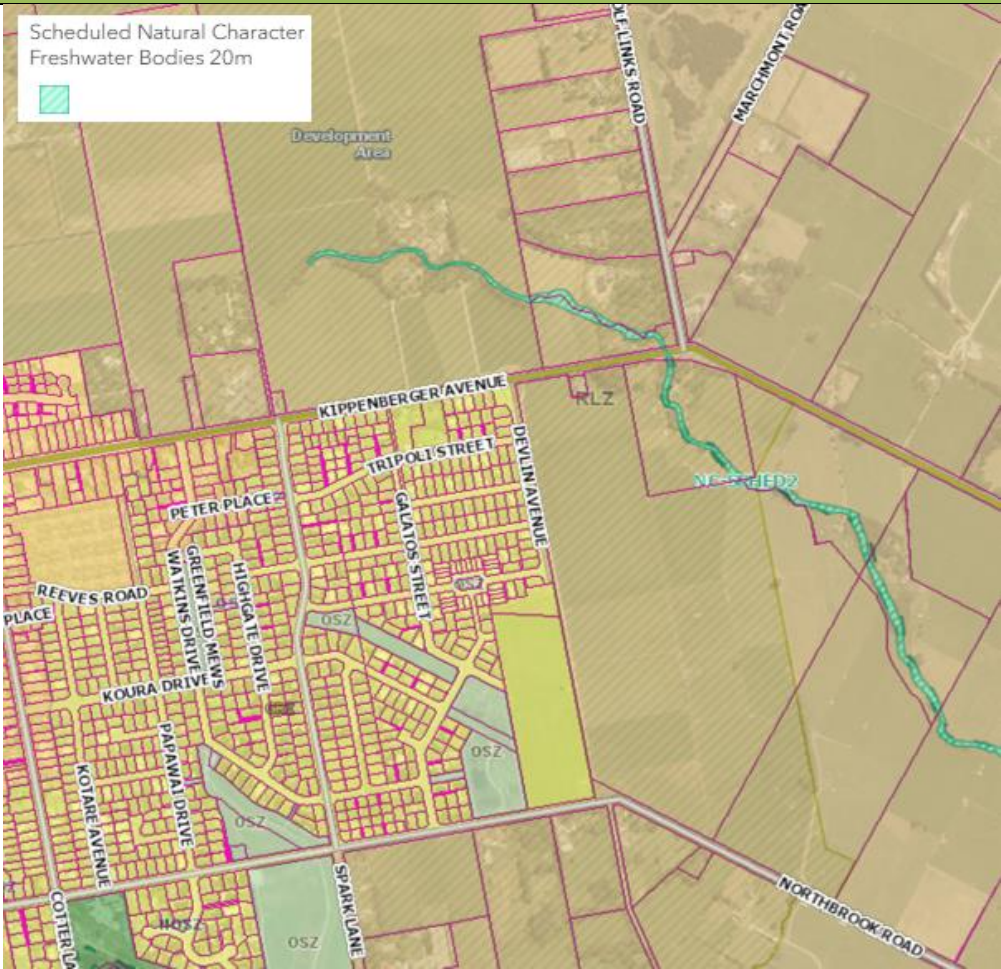


Figure 7. Scheduled Natural Character Freshwater Body Overlay of the pWDP

The Cam/Ruataniwha River is identified in 'NATC-SCHED - Scheduled freshwater bodies' as a NATC-SCHED2 (Main Branch).

Table NATC – 1 specifies that a NATC-SCHED2 Freshwater body should have a 20m setback within a Rural Zone and a 10m setback width within a Residential Zone.

Oppose

The Cam/ River Overlay extent into 52 Kippenberger Avenue (PT RS 267) exceeds that required based on the site-specific ecological survey and assessment undertaken in support of the Bellgrove Stage 1 consent application.

In respect of the Cam River west of the historic farmhouse, AEL have concluded that *'based on our analysis below of soils and plants in both the Cam River Headwater Swale and the Northern Flow Channel, there is no permanent aquatic habitat other the ornamental pond north of the Bellgrove Homestead....'*. AEL note that the provision of a buffer strip at this location *'will not provide an ecological link to aquatic habitats in the near vicinity, regardless of width. Nor does the water temperature moderating effect have to be considered, as no water is present'*.

In addition to the extent of the Cam River identified as having scheduled natural character extending too far west into Bellgrove North, it is noted that Table NATC – 1 specifies that a NATC-SCHED2 Freshwater body should have a 20m-wide setback within a Rural Zone and a 10m-wide setback within a Residential Zone.

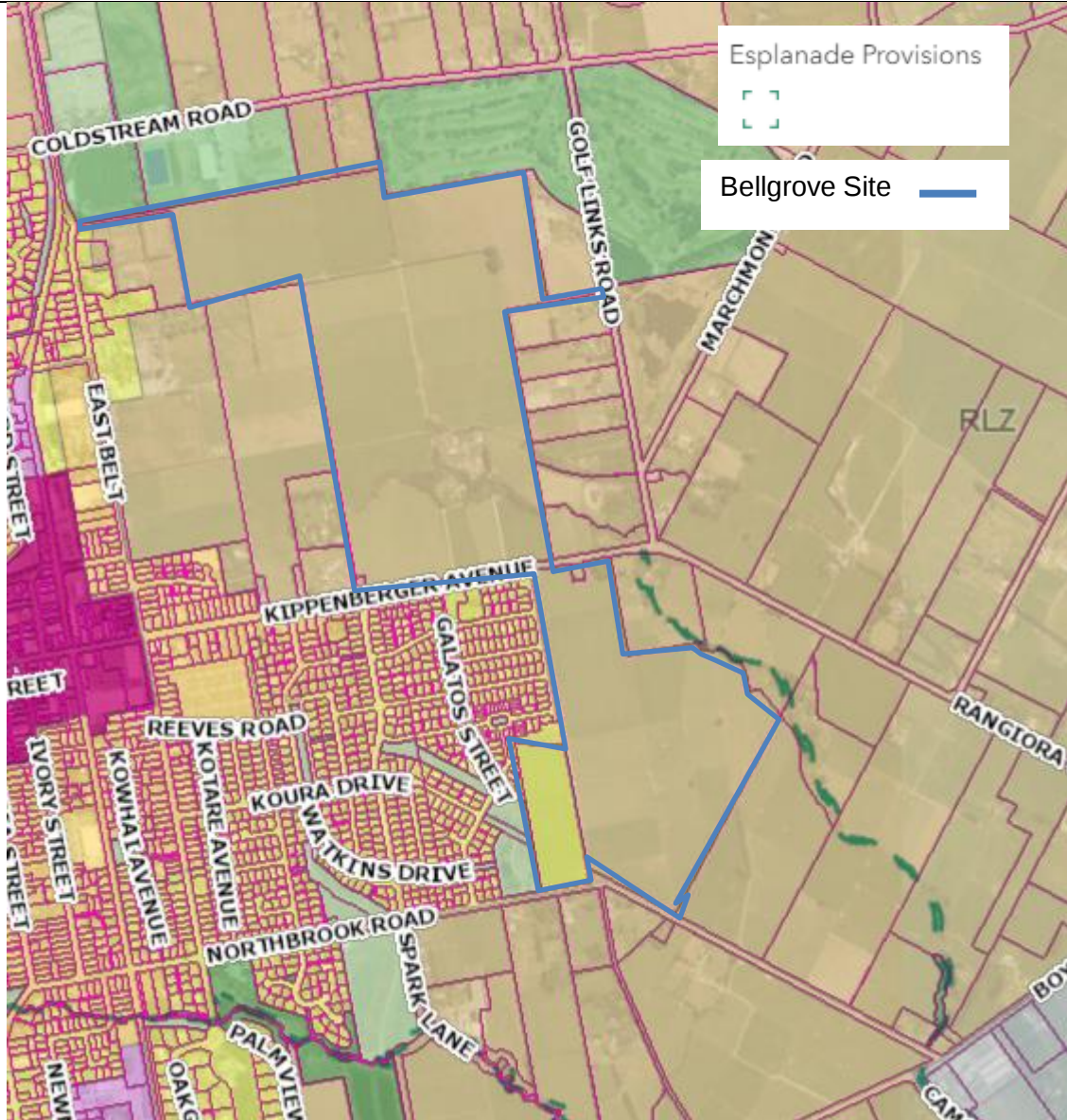
The PWDP GIS overlay mapping legend identifies the Cam/Ruataniwha River within Bellgrove North as being a Scheduled Natural Character Freshwater Body requiring a 20m-wide setback.

While this notation in the GIS overlay currently aligns with Table NMATC-1 (the site is currently rural zoned) the inclusion of '20m' in the GIS mapping notation has the potential to create confusion following the certification process when this land is confirmed for residential development and the required SCHED2 Freshwater body setback will reduce to 10m .

Modify the extent of the Cam/Ruataniwha River scheduled as a Natural Character Freshwater Body 20m so that it does not extend west of the Bellgrove homestead.

Modify the overlay in the GIS map so that it does not specify the setback distance in the legend (this can be included in the planning text) given this is zone dependent and could create confusion, especially in development areas, such as Bellgrove North, that are subject to a proposed certification process to facilitate the transition from rural to urban development.

Rule NATC-R8 and NATC-R9	<i>Rule NATC R8 - New structures within and over freshwater bodies are restricted discretionary</i> <i>Rule NATC R9 - New building or structures are restricted discretionary where:</i> <i>any individual building shall have a maximum building GFA of 75m²;</i> <i>the maximum height of any building or structure shall be 5m;</i> <i>any new impermeable surface is a maximum of 10m²; and</i> <i>the activity complies with NATC-S1 and NATC-S2.</i>	Oppose The difference between Rule NATC-R9 and NATC-R8 is unclear. NATC-R8 appears to be for structures and buildings within or over the waterway, whereas NATC-R9 for structures and buildings within the waterway setback but this is not explicitly specified.	Clarify that Rule NATC R9 applies to buildings within the setback but not the banks of the river itself (noting that for works within the river Rule NATC R8 applies). Amend the overlay extent of the Cam/Ruataniwha River to not extend west of the Belgrove farmhouse to ensure that any dwellings proposed within 20m of the top of the Cam/Ruataniwha River are not restricted unfairly when the ecological values of the river do not warrant such natural character protection.
Subdivision SUB - Wāwāhia whenua (SUB)			
Policy SUB P5 Density in Residential Zones	<i>Provide for a variety of site sizes within Residential Zones, while achieving minimum residential site sizes that are no smaller than specified for the zone.</i>	Support This policy provides developers with flexibility to provide for different lot sizes whilst achieving an overall development outcome within a given zone and/or site. This enables development to respond to and address site features to achieve the overall outcomes sought.	Retain as notified
Policy SUB P7 Requirements of Outline Development Plans	<i>Ensure that subdivision is in accordance with the fixed or flexible elements of any relevant ODP.</i>	Support in part Support development to occur in accordance with ODPs contained within the plan and the acknowledgement that there will be some flexible elements in an ODP which will evolve as design progresses. Given this, the policy should provide for minor departures from ODP elements where these are not fundamental to the overall intent of the ODP.	Amend to read “...in <u>general</u> accordance with...”
Policy SUB P8 Infrastructure	<i>Achieve integrated and comprehensive infrastructure with subdivision by ensuring:</i> <i>upgrade of existing infrastructure where the benefit is solely for the subdivision and subsequent development, or otherwise provide for cost-sharing or other arrangements for any upgrade, such as financial contributions, that are proportional to the benefit received;</i> <i>adequate infrastructure provision and capacity to service the scale and nature of anticipated land uses, including:</i> <i>wastewater disposal that will maintain public health and minimise adverse effects on the environment, while discouraging small-scale standalone community facilities;</i> <i>water supply;</i> <i>stormwater management;</i> <i>phone, internet and broadband connectivity can be achieved, with new lines being underground in urban environments, except within the Special Purpose Zone (Kāinga Nohoanga);</i> <i>electricity supply, with new lines being underground in new urban environments except within the Special Purpose Zone (Kāinga Nohoanga);</i>	Support Support the provision of cost sharing or other arrangements for the provision of infrastructure which will assist other development areas wider than the subdivision area proposed.	Retain as notified

	3. where reticulated wastewater disposal is available, that any new site is to be provided with a means of connection to the system; and 4. where a reticulated wastewater system is not available, ensure that onsite treatment systems will be installed.											
Esplanade Provisions Overlay	 Figure 8. Esplanade Provision Overlay of the pWDP Table SUB-2: Esplanade Reserve or Esplanade Strip Requirements for water bodies <table><tr><th>Water body</th><th>Reach</th><th>Purpose (as set out in section 229 of the RMA)</th></tr><tr><td>Cam River</td><td>From 52 Kippenberger Avenue (inclusive), legally described as Lot 2 DP 394668 Lot 2 DP 452196 Lot 2 DP 12090 Lot 2 DP 24808 Pt Lot 2 DP 9976 Pt Rural Sec 267 to Kippenberger Avenue</td><td>Conservation Natural hazard mitigation</td></tr><tr><td></td><td>From Kippenberger Avenue to the confluence with the Kaiapoi River</td><td></td></tr></table>	Water body	Reach	Purpose (as set out in section 229 of the RMA)	Cam River	From 52 Kippenberger Avenue (inclusive), legally described as Lot 2 DP 394668 Lot 2 DP 452196 Lot 2 DP 12090 Lot 2 DP 24808 Pt Lot 2 DP 9976 Pt Rural Sec 267 to Kippenberger Avenue	Conservation Natural hazard mitigation		From Kippenberger Avenue to the confluence with the Kaiapoi River		Oppose There is a discrepancy between the GIS mapping and the Esplanade Reserve / Strip Table in the PWDP (Table SUB-2). Table SUB-2 includes 52 Kippenberger Avenue as requiring an esplanade reserve for conservation and natural hazard mitigation purposes, but the overlay shown on the GIS mapping stops before extending north of Kippenberger Avenue. The inclusion of 52 Kippenberger Avenue (Part RS 267) within Table SUB-2 as requiring a 20m wide esplanade reserve (in accordance with proposed Rule SUB-S17) is not ecologically appropriate or required. Based on findings of their site-specific investigations, Aquatic Ecology have determined that “there is no permanent aquatic habitat other the ornamental pond north of the Bellgrove Homestead. Therefore, the buffer strip will not provide an ecological link to aquatic habitats in the near vicinity, regardless of width. Nor does the water temperature moderating effect have to be considered, as no water is present.” Consequently, the esplanade reserve provision is not necessary for conservation and natural hazard purposes for this reach of the Cam/Ruataniwha River. The listing in Table SUB 2 for the Cam/Ruataniwha River is different to that in the operative WDP, which identifies the reach as being from DP 9976 and Lot 6 DP 22686 (north of Kippenberger Avenue) to Kippenberger Avenue) and from Kippenberger Avenue to the confluence with the Kaiapoi River.	Ensure that the Esplanade Provision overlay mapping and Table SUB-2 Cam River ‘reach’ description are consistent by modifying the Table to exclude 52 Kippenber Avenue (Part RS 267).
Water body	Reach	Purpose (as set out in section 229 of the RMA)										
Cam River	From 52 Kippenberger Avenue (inclusive), legally described as Lot 2 DP 394668 Lot 2 DP 452196 Lot 2 DP 12090 Lot 2 DP 24808 Pt Lot 2 DP 9976 Pt Rural Sec 267 to Kippenberger Avenue	Conservation Natural hazard mitigation										
	From Kippenberger Avenue to the confluence with the Kaiapoi River											

Subdivision Standard-S3 Residential Yield	<i>1. Residential subdivision of any area subject to an ODP, except in the Large Lot Residential Zone, shall provide for a minimum net density of 15 households per ha, unless there are demonstrated constraints then no less than 12 households per ha.</i>	Oppose Subdivision Standard S3 contradicts the overall density outcome sought for the South East Rangiora ODP of 12 households per hectare. Standard S3 and the ODP text should be consistent. 12 households per hectare should be the minimum target across new development areas, consistent with that proposed in Our Space (Section 6.2) which included an action for Selwyn and Waimakariri District Councils to provide for future residential development areas at a minimum residential density of 12 households per hectare. This would not preclude development from achieving a greater density than 12 households per hectare and is consistent with the residential growth outcomes sought for Rangiora. Further it aligns with the Canterbury Regional Policy Statement (CRPS) (Policy 6.3.7 (3)) which notes <i>‘Intensification developments and development in greenfield priority areas shall achieve at least the following residential net densities averaged over the whole of an ODP area (except where subject to an existing operative ODP with specific density provisions):</i> <i>a. 10 household units per hectare in greenfield areas in Selwyn and Waimakariri District’.</i>	Reword Subdivision Standard S3 to be: 1. Residential subdivision of any area subject to an ODP, except in the Large Lot Residential Zone, shall provide for a minimum net density of 15 households per ha, unless: <u>a: an alternative minimum net density outcome is specified within an approved ODP; and/or</u> <u>b.</u> there are demonstrated constraints then no less than 12 households per ha. <u>OR</u> Alternatively reword Subdivision Standard S3 to be: 1. Residential subdivision of any area subject to an ODP, except in the Large Lot Residential Zone, shall provide for a minimum net density of <u>12</u> 15 households per ha.
Noise - Te orooro - NOISE			
NOISE – R16 Residential units and minor residential units within 80m of an arterial road All Zones	<i>Residential units and minor residential units within 80m of an arterial road, strategic road or rail designation are permitted where:</i> <i>any new residential unit or minor residential unit shall be designed and constructed to achieve a minimum external and internal noise reduction of 30 dB Dtr,2m,nT,w + Ctr to any habitable room; or</i> <i>be designed and constructed to meet the following maximum indoor design sound levels:</i> <i>road traffic noise within any habitable room – 40 dB LAeq(24hr);</i> <i>rail noise inside bedrooms between 10:00pm and 7:00am – 35 dB LAeq(1h); and</i> <i>rail noise inside any habitable room excluding bedrooms – 40 dB LAeq(1h);</i> <i>the design for road traffic noise shall take into account future permitted use of the road, either by the addition of 2 dB to predicted sound levels or based on forecast traffic in 20 years’ time;</i>	Oppose Rule Noise R16 will apply to Kippenberger Avenue (Arterial Road) which is excessive given: - the arterial road has a speed limit of 50km/hr; - only approximately 4% of traffic on this road is ‘heavy’; 80m is a considerable buffer distance within which specific insulation measures are required (e.g. the CDP applies a requirement for noise insulation measures for residential units within only a 40m distance from arterial roads).	Modify the rule so that it only applies within 40m of an arterial road (as opposed to 80m). Provide an alternative approval pathway that does not require a bespoke acoustic assessment for each residential unit that can demonstrate compliance with (1) and (2).

	4. rail noise shall be deemed to be 70 dB LAeq(1h) at 12m from the edge of the track, and shall be deemed to reduce at a rate of 3 dB per doubling of distance up to 40m and 6 dB per doubling of distance beyond 40m; 5. the indoor design sound level shall be achieved at the same time as the ventilation requirements of the New Zealand Building Code. If windows are required to be closed to achieve the indoor design sound levels then an alternative means of ventilation shall be required within bedrooms; 6. the external to internal noise reduction shall be assessed in accordance with ISO 16283-3:2016 Acoustics — Field measurement of sound insulation in buildings and of building elements — Part 3: Façade sound insulation and ISO 717-1:2020 Acoustics — Rating of sound insulation in buildings and of building elements — Part 1: Airborne sound insulation.	The proposed rule requires any future residential unit to undertake an acoustic assessment to demonstrate compliance and does not enable an alternative consenting pathway (e.g. application of certain building insulation provisions (such as construction requirements for external walls, specified glazing requirements) that will help with acoustic insulation reduction). There should be an either/or option for those future residential unit developers wanting to achieve compliance with this provision without needing to engage an acoustic engineer.	
Signs - Ngā tohu – (SIGN)			
Policy Sign P4 Amenity Values and Character	<i>Amenity values and character</i> <i>Maintain the character and amenity values of zones by:</i> 1. limiting the size, height and the number of freestanding signs; 2. ensuring signs do not protrude above the roofline or fence line where attached to a building or fence; 3. limiting the height of signs on verandahs in any Town Centre Zone, Local Centre Zone, Neighbourhood Centre Zone or Mixed Use Zone; 4. limiting the extent of signs on windows in any Town Centre Zone; 5. limiting proliferation of off-site signs by: 6. managing such signs in Industrial Zones including the interface with non-industrial zones; and 7. avoiding such signs in Residential Zones, Rural Zones, Commercial and Mixed Use Zones, Open Space and Recreation Zones, and Special Purpose Zones; 8. limiting digital signs; and 9. avoiding permanent signs identifying a subdivision development to support the integration of new developments with surrounding areas.	Oppose In Part Policy Sign P4(9) seeks to ‘avoid’ any permanent subdivision signage. The s32 report prepared for the signage chapter of the PWDP notes that this is on the basis that subdivision development entrance signs may ‘continue to be erected and thereby reduce residential neighbourhood cohesion and integration (character)’. However, using the word ‘avoid’ in Policy Sign P4 is too restrictive and does not reflect that new comprehensive development areas such as Bellgrove, which will cover a total site area of approximately 100ha, will ultimately establish its own new residential neighbourhood, character and identity. For residential development of this scale it is more than appropriate for it to have appropriate entrance signage to assist with wayfinding and community identity.	Delete P4 (9). If WDC choose to retain this provision then the wording should be altered from ‘avoiding’ to ‘limiting’ to enable for exemptions and appropriately sized signage. Consequential changes to associated rules / activity status to reflect the requested policy change.
Rule SIGN R9 Any subdivision development entrance sign	<i>Any subdivision development entrance sign is a Non-complying Activity.</i>	Oppose Making any subdivision development entrance sign a non-complying activity is overly restrictive and unjustified from a resource management or environmental effects perspective.	Provide for subdivision development entrance signs as a permitted activity, restricted as to size / number. Provide for any breach as a controlled or (at most) restricted discretionary activity with matters of control/discretion limited to visual clutter, length of road frontage, and impacts on amenity values.
Residential Zones – Whaitua Nohonoho – (RESZ)			
Objective RESZ-01 Residential Growth, Location and Timing	<i>Sustainable residential growth that:</i> 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.	Support BRL support the objective for housing to meet community and district needs (reflecting the local context of the Waimakariri District)., and the enablement of new residential development.	Retain as notified

Objective RESZ-04 Non-residential activities	<i>Small-scale non-residential activities that take place in residential areas support the function of local communities.</i>	Support Support the enablement of appropriate non-residential activities within residential zones acknowledging the support that these provide for local communities.	Retain as notified
Objective RESZ-05 Housing Choice	<i>Residential Zones provide for the needs of the community through:</i> <i>1. a range of residential unit types; and</i> <i>2. a variety of residential unit densities.</i>	Support Support residential zones being developed in a way that provides for housing choice and a range of residential unit densities to meet market demand.	Retain as notified
Policy RESZ-P1 Design of Development	<i>New development in residential areas is well designed and laid out, including by:</i> <i>1. ensuring that the bulk, scale and location of buildings on sites is consistent with the environment anticipated for the zone, and that impacts in relation to dominance, privacy and shadowing are minimised, while recognising the ability for larger sites in the General Residential Zone and Medium Density Residential Zone to absorb greater height;</i> <i>2. ensuring that the combination of buildings, paved surface, and landscaped permeable surface coverage retain a landscaped component for residential sites and provide opportunity for on-site stormwater infiltration, and where this is reduced that it is offset by suitable planting, other green surface treatment, and stormwater attenuation;</i> <i>3. maintaining streetscapes in Residential Zones where garaging and buildings are set back from the street, and where these setbacks are reduced, that sufficient space is still available for vehicle manoeuvring and impacts of dominance on the streetscape are minimised;</i> <i>4. facilitating passive surveillance and active residential frontages through controls on glazing, avoidance of blank facades, provision of habitable rooms and front door entrances to residential units facing the street, and consider modification of those controls only where other active design features such as verandas are incorporated;</i> <i>5. minimising the adverse impact of high fences on streetscape character and public safety; and</i> <i>6. ensuring that residential activities are provided with sufficient on-site outdoor living space for residents through access to outdoor living space that is complements the housing typology, or where not directly provided, take into account alternative arrangements for open space (either within the site or within close proximity to the site).</i>	Support in part While BRL support high quality design of residential areas there are aspects of Policy RESZ-P1 which are too restrictive and do not account for varying housing typology outcomes. For example, terraced housing typologies with a service lane or road behind that may open out onto green space or a green link may not achieve a habitable room that faces the street, despite providing a high-quality amenity outcome.	Amend Policy RESZ-P1 to ensure it aligns with refined bulk form standard provisions in the general and medium density residential zones.
Policy RESZ-P6 Non-residential activities	<i>Non-residential activities are provided for in a manner that:</i> <i>1. avoids, or where appropriate remedies or mitigates, actual and potential adverse effects from structures, signs, glare, noise and hazardous substances, including controls on timing or duration of activities;</i> <i>2. ensures that the scale of the activity does not significantly impact on the amenity values of adjoining residential activities, including their pleasantness and aesthetic coherence; and</i> <i>3. recognise that the following non-residential activities serve a benefit to the surrounding community and are provided for, subject to appropriate management of their effects:</i> <i>a. community facilities;</i>	Support BRL support the provision of community facilities, educational facilities and childcare facilities within residential areas, noting that these are fundamental components of a residential environment.	Retain as Notified

	<i>b. educational facilities; and</i> <i>c. childcare facilities.</i>		
Policy RESZ-P10 Retirement Villages	<i>Provide for the development of retirement villages in all Residential Zones, other than the Large Lot Residential Zone, where:</i> <i>1. consistent with good urban design, including external design; and</i> <i>2. integration with any adjacent residential activity, the transport system, roads and parking is achieved.</i>	Support BRL support the establishment of retirement villages both within the general and medium density residential zones.	Retain as Notified
Policy RESZ-P14 Development Density	<i>Development densities for new Development Areas and Large Lot Residential Zone Overlays shall be as follows:</i> <i>1. in new Development Areas, achieve a minimum net density of 15 households per ha averaged across the whole of the residential Development Area within the relevant ODP, unless there are demonstrated constraints then no less than 12 households per ha.</i> <i>2. in new Large Lot Residential Zone Overlays, achieve a net density of 1 to 2 households per ha.</i>	Oppose in Part Policy RESZ-P14 contradicts the South-East Rangiora ODP text which states “overall, the South East Rangiora Development Area shall achieve a minimum residential density of 12 households per ha “ and does not include a provision that 15 households per ha should be achieved where there are no development constraints. There should be consistency amongst the provisions of the PWDP and in particular Subdivision Standard S3. 12 households per hectare should be the minimum target across new development areas, consistent with that proposed in Our Space (Section 6.2) which included an action for Selwyn and Waimakariri District Councils to provide for future residential development areas at a minimum residential density of 12 households per hectare. This would not preclude development from achieving a greater density than 12 households per hectare and is consistent with the residential growth outcomes sought for Rangiora. Further it aligns with the CPRS Policy 6.3.7 (3).	Amend the text: <i>Development densities for new Development Areas and Large Lot Residential Zone Overlays shall be as follows:</i> <i>1. in new Development Areas, achieve a minimum net density of 15 12 households per ha averaged across the whole of the residential Development Area within the relevant ODP;</i>
General Residential Zone			
Rule GRZ-R10 Home Business	<i>Home business is permitted where</i> <i>1. the operator permanently resides on the site;</i> <i>2. the maximum area occupied by the home business shall be 40m² (within or external to buildings on the site);</i> <i>3. hours of operation that the home business is open to visitors and clients shall be limited to 7:00am to 7:00pm;</i> <i>4. there is a maximum of 20 vehicle movements generated by the home business activity per day;</i> <i>5. a maximum of two non-resident staff shall be employed as part of the home business;</i> <i>6. any storage of materials associated with the home business shall be undertaken within buildings as part of the site identified in (2);</i> <i>7. the activity does not include any food and beverage outlet, funeral related services and facility, heavy industry, vehicle sales, or vehicle repair, storage or dismantling; and</i>	Support Support the identification of home business activity within the general residential zone as a permitted activity.	Retain as Notified

	8. the home business involves paid childcare, a maximum of four non-resident children shall be cared for. Activity status when compliance not achieved: DIS		
Rule GRZ-R11 Residential unit used as a show home	Residential unit used as a show home is permitted where: - hours of operation, when the site is open to visitors and clients, shall be limited to 9:00am-4:00pm Monday to Sunday including public holidays; - the duration of use as a show home shall not exceed two years after the Code of Compliance Certificate for the subject building has been issued; and - the residential unit used as a show home shall not be located on local roads. Activity status when compliance not achieved: RDIS <u>Matters of Discretion: RES-MD3: Use of residential unit as a show home</u> - The extent to which use of the residential unit will impact on neighbouring properties in terms of the following matters: - hours of operation and movement to and from the site by members of the public; - duration of the activity and its impact on residential amenity values; - traffic generation including consideration of on-site and off-site parking; and - impacts on adjacent residents in terms of privacy, in particular adjacent outdoor living spaces	Support in part Support the identification of show homes within the general residential zone as a permitted activity. Seek more permissive hours of operation during the week to enable after work viewings on weekdays (i.e. 9am to 7pm Monday to Friday).	Amend criterion (1) of Rule MRZ-R11 to enable show homes to be open Monday to Friday 9.00am to 7.00pm and Saturday, Sunday and public holidays 9.0am to 4.00pm.
Rule GRZ-R12 Educational Facility	Educational Facility is permitted where - the activity shall only be located on sites with frontage and the primary entrance to a strategic road, arterial road or collector road; - the maximum GFA of building occupied by the educational facility shall be 200m²; - the hours of operation when the site is open to visitors, students, clients, and deliveries shall be between the hours of 7:00am – 9:00pm Monday to Friday; - the facility shall not result in more than two non-residential activities within a residential block frontage; and - the facility shall not include the parking or storage of more than one heavy vehicle on the site of the activity. Activity status when compliance not achieved: DIS	Support in Part Educational facility is defined in the PWDP as 'land or buildings used for teaching or training by childcare services, schools, or tertiary education services, including any ancillary activities.' BRL support the permitted development of educational facilities within the general residential zone but note that a) A maximum GFA for an educational facility of 200m³ is restrictive and the activity status where a building exceeds this is discretionary. Instead any non-compliance with criterion (2) of Rule GRZ-R12 should result in restricted discretionary status, with Council's discretion restricted to matters relating solely to the scale of non-residential activity b) Criterion (4) in Rule GRZ-R12 is confusing given it does not define residential block frontage (i.e. the length a block extends for).	Amend Rule GRZ-R12 so that a proposal which does not meet permitted rule criteria (2) to result in restricted discretionary status with Council's discretion restricted to matters relating solely to the scale of non-residential activity as opposed to full discretionary status. Further clarify criterion (4).
Rule GRZ -R13 Childcare Facility	Childcare Facility is permitted where - the activity shall only be located on sites with frontage and the primary entrance to a strategic road, arterial road or collector road; - the maximum GFA of building occupied by the childcare facility shall be 200m²; - the hours of operation when the site is open to visitors, children, clients, and deliveries shall be between the hours of 7:00am – 9:00pm Monday to Friday; - the facility shall not result in more than two non-residential activities within a residential block frontage; and	Support in Part Childcare facility is defined in the PWDP as 'land and/or buildings used for the paid care of more than four children that are not related to the resident of the site, or where the site is not run as a home business. It excludes rooms or land used for sports training' BRL support the permitted development of	Amend Rule GRZ-R13 so that a proposal which does not meet permitted rule criteria (2) results in restricted discretionary status as opposed to discretionary status. Further clarify criterion (4).

	5. <i>the facility shall not include the parking or storage of more than one heavy vehicle on the site of the activity.</i> <i>Activity status when compliance not achieved: DIS</i>	childcare facilities within the general residential zone but note that a) A maximum GFA for a childcare facility of 200m³ is restrictive for modern day learning environments, and the activity status for non-compliance with this is discretionary. Instead any non-compliance with criterion (2) of Rule GRZ-R13 should result in restricted discretionary status, with Council's discretion restricted to matters relating solely to the scale of non-residential activity b) Criterion (4) in Rule GRZ-R13 is confusing given it does not define residential block frontage (i.e. how long the long a block extends for).	
Rule GRZ-R20 Retirement Vilalge	<i>A Retirement Village is restricted discretionary where a design statement is provided with the application.</i> <i>Matters of discretion are restricted to:</i> <i>RES-MD2 - Residential design principles</i> <i>RES-MD7 - Outdoor storage</i> <i>Where a design statement is not provided, a retirement village is a full discretionary activity.</i> <u>RES-MD2 Residential Design Principles</u> <i>Context and character:</i> <i>The extent to which the design of the development is in keeping with, or complements, the scale and character of development anticipated for the surrounding area and relevant significant natural, heritage and cultural features.</i> <i>The relevant considerations are the extent to which the development:</i> <i>includes, where relevant, reference to the patterns of development in and/or anticipated for the surrounding area such as building dimensions, forms, setback and alignments, and secondarily materials, design features and tree plantings; and</i> <i>retains or adapts features of the site that contribute significantly to local neighbourhood character, potentially including existing historic heritage items, Sites of Ngāi Tahu Cultural Significance shown on the planning map, site contours and mature trees.</i> <i>Relationship to the street and public open spaces:</i> <i>Whether the development engages with and contributes to adjacent streets, and any other adjacent public open spaces to contribute to them being lively, safe and attractive.</i> <i>The relevant considerations are the extent to which the development:</i> <i>orientates building frontages including entrances and windows to habitable rooms toward the street and adjacent public open spaces;</i> <i>designs buildings on corner sites to emphasise the corner;</i> <i>needs to minimise south-facing glazing to minimise heat loss; and</i> <i>avoids street façades that are blank or dominated by garages.</i> <i>Built form and appearance:</i>	Oppose Retirement Villages should be controlled (as opposed to restricted discretionary) subject to compliance with the built form standards, with control restricted to certain matters. Rule GRZ-R20 requires a design statement to be prepared for any retirement village proposed within the general residential zone (regardless of scale). A design statement is defined as <i>'for the purpose of assessing multi-unit residential development and retirement villages, a report prepared by an expert suitably qualified and experienced person in resource management planning, which may include assessments from other professional experts such as architects, urban designers, landscape architects and transport planners. A design statement:</i> <i>outlines the design justification for the proposal;</i> <i>examines local character, site opportunities and constraints; and</i> <i>provides plans of the proposal within the context of surrounding sites, streets and public places (if any).'</i> The matters of discretion against which a proposal would be assessed, as outlined in RES-MD2, are extensive and will not provide certainty to an applicant as to the final design outcome of a village.	Amend Rule GRZ-R20 so that retirement villages which comply with all the relevant built form standards are 'controlled' to provide greater developer certainty. In addition, only require a design statement for retirement villages over a certain size/scale and/or where villages do not comply with the other built form standards of the residential zone. .

	a. <i>The extent to which the development is designed to minimise the visual bulk of the buildings and provide visual interest.</i> b. <i>The relevant considerations are the extent to which the development:</i> i. <i>divides or otherwise separates unusually long or bulky building forms and limits the length of continuous rooflines;</i> ii. <i>utilises variety of building form and/or variation in the alignment and placement of buildings to avoid monotony;</i> iii. <i>avoids blank elevations and façades dominated by garage doors; and</i> iv. <i>achieves visual interest and a sense of human scale through the use of architectural detailing, glazing and variation of materials.</i> 4. <i>Residential amenity:</i> a. <i>In relation to the built form and residential amenity of the development on the site (i.e. the overall site prior to the development), the extent to which the development provides a high level of internal and external residential amenity for occupants and neighbours.</i> b. <i>The relevant considerations are the extent to which the development:</i> i. <i>provides for outlook, sunlight and privacy through the site layout, and orientation and internal layout of residential units;</i> ii. <i>directly connects private outdoor spaces to the living spaces within the residential units;</i> iii. <i>ensures any communal private open spaces are accessible, usable and attractive for the residents of the residential units; and</i> iv. <i>includes tree and garden planting particularly relating to the street frontage, boundaries, accessways, and parking areas.</i> 5. <i>Access, parking and servicing:</i> a. <i>The extent to which the development provides for good access and integration of space for parking and servicing.</i> b. <i>The relevant considerations are the extent to which the development:</i> i. <i>integrates access in a way that is safe for all users, and offers convenient access for pedestrians to the street, any nearby parks or other public recreat</i>		
Built Form Standard GRZ-BFS6 Street interface	1. <i>Where the site has direct road frontage, any residential unit or minor residential unit facing the road shall:</i> a. <i>have at least one habitable room or kitchen located facing the street at ground level; and</i> b. <i>include at least 20% of the front façade in glazing (within window or door panels) of which at least half is clear; and</i> c. <i>shall have a door that is directly visible and accessible from the street.</i> 2. <i>Garage doors that face the street shall have a combined maximum width of 6.5m.</i> <i>Activity status when compliance not achieved: RDIS</i> <i>Matters of discretion are restricted to: RES-MD2 - Residential design principles</i>	Oppose While BRL support high quality design of residential areas aspects of Built Form Standard GRZ-BFS6 are too restrictive, not accounting for varying housing typology outcomes. For example, terraced housing typologies with a service lane or road behind that may open out onto green space or a green link may not seek to achieve a habitable room that faces the street, instead seeking to orientate towards the public open space.	Introduce greater flexibility to GRZ-BFS6 for the scenario where a lot is orientated so that it has both road frontage and open space frontage. For example, the wording could be amended to: <i>Where the site has direct road frontage, any residential unit or minor residential unit facing the road shall:</i> a. <i>have at least one habitable room or kitchen located facing the street at ground level; and</i> b. <i>include at least 20% of the front façade in glazing (within window or door panels) of which at least half is clear; and</i> c. <i>shall have a door that is directly visible and accessible from the street.</i> <u>Where a site has both direct road frontage and direct frontage with an open space reserve it is exempt from compliance with GRZ BFS6 1(a). In these situations, a residential unit may have a habitable room or kitchen at ground level located to face the</u>

			<u>open space frontage instead of the street frontage.</u>
Built Form Standard GRZ-BFS7 Height in relation to boundary	- Structures shall not project beyond a building envelope defined by recession planes measured 2.5m from ground level above any site boundary in accordance with the diagrams in Appendix APP3 except for the following: - flagpoles; - lightning rods, chimneys, ventilation shafts, solar heating devices, roof water tanks, lift and stair shafts; - decorative features such as steeples, towers and finials; - for buildings on adjoining sites which share a common wall, the height in relation to boundary requirement shall not apply along that part of the internal boundary covered by such a wall; and - where the land immediately beyond the site boundary forms part of any rail corridor, drainage reserve, or accessway (whether serving the site or not), the boundary of the rail corridor, drainage reserve, or accessway furthest from the site boundary may be deemed to be the site boundary for the purpose of defining the origin of the recession plane, provided this deemed site boundary is no further than 6m from the site boundary; - Provided that none of the structures listed in (1) (c) to € above has a horizontal dimension of over 3m along the line formed where the structure meets the recession plane as measured parallel to the relevant boundary. - Where the site is within the Urban Flood Assessment Overlay or Kaiapoi Fixed Minimum Finished Floor Level Overlay, the height of the Finished Floor Level specified in a Flood Assessment Certificate can be used as the origin of the recession plane instead of ground level, but only up to an additional 1m above original ground level.	Support Supportive of (3) which clarifies that where a site needs to be raised to address flood hazard that the recession plane can be taken from the certified finished floor level (up to 1m above original ground level).	Retain as Notified
Built Form Standard GRZ-BFS8 Fencing	- All fencing or walls fronting the road boundary; or within 2m of a site boundary with a public reserve, walkway or cycleway, shall be: - no higher than 1.2m above ground level; or - no higher than 1.8m above ground level where at least 45% of the fence is visually permeable. - Any fence or wall greater than 0.9m in height above ground level shall be at least 45% visually permeable as depicted in Figure GRZ-2, within 5m of any accessway, or within the structure and vegetation set back area shown in Figure GRZ-1.	Oppose The PWDP introduces new fencing requirements for the residential zones that are not within the WDP (except for within residential zones that were added as part of subsequent plan changes to the WDP). The proposed fencing requirements are overly restrictive (particularly those in (2) which apply to any fence adjacent to an accessway (which includes a private right of way and access lot).	Amend BFS8 (2) so that where a fence within 5m of an accessway is greater than 0.9m in height it is at least 35% visually permeable (instead of 45%).
<u>Medium Density Residential Zone</u>			
Rule MRZ-R10 Home business	Home business is permitted where: - the operator permanently resides on the site; - the maximum area occupied by the home business shall be 40m² (within or external to buildings on the site), except in the Residential Commercial Precinct where the maximum area shall be 100m²; - hours of operation that the home business is open to visitors and clients shall be limited to 7:00am to 7:00pm; - there is a maximum of 20 vehicle movements generated by the home business activity per day; - a maximum of two non-resident staff shall be employed as part of the home business; - any storage of materials associated with the home business shall be undertaken within buildings as part of the site identified in (2);	Support Support the identification of home business activity within the general residential zone as permitted activities.	Retain as Notified

	7. <i>the activity does not include any food and beverage outlet, funeral related services and facility, heavy industry, vehicle sales, or vehicle repair, storage or dismantling; and</i> 8. <i>where the home business involves paid childcare, a maximum of four non-resident children shall be cared for.</i> <i>Activity status when compliance not achieved: DIS</i>		
Rule MRZ-R11 Residential unit used as a show home	<i>Residential unit used as a show home is permitted where:</i> <i>hours of operation, when the site is open to visitors and clients, shall be limited to 9:00am-4:00pm Monday to Sunday including public holidays;</i> <i>the duration of use as a show home shall not exceed two years after the Code of Compliance Certificate for the subject building has been issued; and</i> <i>the residential unit used as a show home shall not be located on local roads.</i> <i>Activity status when compliance not achieved: RDIS</i> <u><i>Matters of Discretion: RES-MD3: Use of residential unit as a show home</i></u> <i>The extent to which use of the residential unit will impact on neighbouring properties in terms of the following matters:</i> <i>hours of operation and movement to and from the site by members of the public;</i> <i>duration of the activity and its impact on residential amenity values;</i> <i>traffic generation including consideration of on-site and off-site parking; and</i> <i>impacts on adjacent residents in terms of privacy, in particular adjacent outdoor living spaces</i>	Support Support the identification of show homes within the medium density residential zone as permitted activities. Seek more permissive hours of operation during the week to enable after work viewings on weekdays (i.e. 9am to 7pm Monday to Friday).	Amend criterion (1) of Rule MRZ-R11 to enable show homes to be open Monday to Friday 9.00am to 7.00pm and Saturday, Sunday and public holidays 9.0am to 4.00pm.
Rule MRZ-R12 Educational Facility	<i>Educational Facility is permitted where:</i> <i>the activity shall only be located on sites with frontage and the primary entrance to a strategic road, arterial road or collector road;</i> <i>the maximum GFA of building occupied by the educational facility shall be 200m²;</i> <i>the hours of operation when the site is open to visitors, students, clients, and deliveries shall be between the hours of 7:00am – 9:00pm Monday to Friday;</i> <i>the facility shall not result in more than two non-residential activities within a residential block frontage, except in the Residential Commercial Precinct, where there shall be no limit to the number of non-residential activities within a block; and</i> <i>the facility shall not include the parking or storage of more than one heavy vehicle on the site of the activity.</i> <i>Activity status when compliance not achieved: DIS</i>	Support in Part Educational facility is defined in the PWDP as 'land or buildings used for teaching or training by childcare services, schools, or tertiary education services, including any ancillary activities.' BRL support the permitted development of educational facilities within the general residential zone but note that - A maximum GFA for an educational facility of 200m³ is restrictive and the activity status where a building exceeds this is discretionary. Instead any non-compliance with criterion (2) of Rule MRZ-R12 should result in restricted discretionary status, with Council's discretion restricted to matters relating solely to the scale of non-residential activity - Criterion (4) in Rule MRZ-R12 is confusing given it does not define residential block frontage (i.e. the length a block extends for).	Amend Rule MRZ-R12 so that a proposal which does not meet permitted rule criteria (2) to result in restricted discretionary status with Council's discretion restricted to matters relating solely to the scale of non-residential activity as opposed to full discretionary status. Further clarify criterion (4).
Rule MRZ-R13 Childcare Facility	<i>Childcare Facility is permitted where:</i> <i>the activity shall only be located on sites with frontage and the primary entrance to a strategic road, arterial road or collector road;</i> <i>the maximum GFA of building occupied by the childcare facility shall be 200m²;</i>	Support in Part Childcare facility is defined in the PWDP as 'land and/or buildings used for the paid care of more than four children that are not related	Amend Rule MRZ-R13 so that a proposal which does not meet permitted rule criteria (2) results in restricted discretionary status as opposed to discretionary status.

	3. the hours of operation when the site is open to visitors, students, children, and deliveries shall be between the hours of 7:00am – 9:00pm Monday to Friday; 4. the facility shall not result in more than two non-residential activities within a residential block frontage, except in the Residential Commercial Precinct, where there shall be no limit to the number of non-residential activities within a block; and 5. the facility shall not include the parking or storage of more than one heavy vehicle on the site of the activity. Activity status when compliance not achieved: DIS	to the resident of the site, or where the site is not run as a home business. It excludes rooms or land used for sports training' BRL support the permitted development of childcare facilities within the general residential zone but note that a) A maximum GFA for a childcare facility of 200m³ is restrictive for modern day learning environments, and the activity status for non-compliance with this is discretionary. Instead any non-compliance with criterion (2) of Rule MRZ-R13 should result in restricted discretionary status, with Council's discretion restricted to matters relating solely to the scale of non-residential activity b) Criterion (4) in Rule MRZ-R13 is confusing given it does not define residential block frontage (i.e. how long the long a block extends for).	Further clarify criterion (4).
Rule MRZ-R19 Retirement Village	Retirement Village is a restricted discretionary activity where a design statement shall be provided with the application. Activity status when compliance not achieved (i.e. design statement provided): DIS Matters of discretion are restricted to: - RES-MD2 - Residential design principles - RES-MD7 - Outdoor storage	Oppose Retirement Villages should be controlled (as opposed to restricted discretionary) subject to compliance with the built form standards, with control restricted to certain matters. Rule MRZ-R19 requires a design statement to be prepared for any retirement village proposed within the general residential zone (regardless of scale). A design statement is defined as 'for the purpose of assessing multi-unit residential development and retirement villages, a report prepared by an expert suitably qualified and experienced person in resource management planning, which may include assessments from other professional experts such as architects, urban designers, landscape architects and transport planners. A design statement: d. outlines the design justification for the proposal; e. examines local character, site opportunities and constraints; and f. provides plans of the proposal within the context of surrounding sites, streets and public places (if any).' The matters of discretion against which a proposal would be assessed, as outlined in RES-MD2, are extensive and will not provide certainty to an applicant as to the final design outcome of a village.	Amend Rule MRZ-R19 so that retirement villages which comply with all the relevant built form standards are 'controlled' to provide greater developer certainty. In addition, only require a design statement for retirement villages over a certain size/scale and/or where villages do not comply with the other built form standards of the residential zone. .

Built Form Standard MRZ-BFS6 Street Interface	1. <i>Where the site has direct road frontage, any residential unit or minor residential unit facing the road shall:</i> a. <i>have at least one habitable room or kitchen located facing the street at ground level; and</i> b. <i>include at least 20% of the front façade in glazing (within window or door panels) of which at least half is clear; and</i> c. <i>shall have a door that is directly visible and accessible from the street.</i> 2. <i>Garage doors that face the street shall have a combined maximum width of 6.5m.</i> <i>Activity status when compliance not achieved: RDIS</i> <i>Matters of discretion are restricted to: RES-MD2 - Residential design principles</i>	Oppose While BRL support high quality design of residential areas aspects of Built Form Standard MRZ-BFS6 are too restrictive, not accounting for varying housing typology outcomes. For example, terraced housing typologies with a service lane or road behind that may open out onto green space or a green link may not seek to achieve a habitable room that faces the street, instead seeking to orientate towards the public open space.	Introduce greater flexibility to MRZ-BFS6 for the scenario where a lot is orientated so that it has both road frontage and open space frontage. For example, the wording could be amended to: <i>Where the site has direct road frontage, any residential unit or minor residential unit facing the road shall:</i> a. <i>have at least one habitable room or kitchen located facing the street at ground level; and</i> b. <i>include at least 20% of the front façade in glazing (within window or door panels) of which at least half is clear; and</i> c. <i>shall have a door that is directly visible and accessible from the street.</i> d. <u>Where a site has both direct road frontage and direct frontage with an open space reserve it is exempt from compliance with GRZ BFS6 1(a). In these situations, a residential unit may have a habitable room or kitchen at ground level located to face the open space frontage instead of the street frontage.</u>
Built Form Standard MRZ-BFS7 Height in relation to Boundary	1. <i>Structures shall not project beyond a building envelope defined by recession planes measured 2.5m from ground level above any site boundary in accordance with the diagrams in Appendix APP3 except for the following:</i> a. <i>flagpoles;</i> b. <i>lightning rods, chimneys, ventilation shafts, solar heating devices, roof water tanks, lift and stair shafts;</i> c. <i>decorative features such as steeples, towers and finials;</i> d. <i>for buildings on adjoining sites which share a common wall, the height in relation to boundary requirement shall not apply along that part of the internal boundary covered by such a wall; and</i> e. <i>where the land immediately beyond the site boundary forms part of any rail corridor, drainage reserve, or accessway (whether serving the site or not), the boundary of the rail corridor, drainage reserve, or accessway furthest from the site boundary may be deemed to be the site boundary for the purpose of defining the origin of the recession plane, provided this deemed site boundary is no further than 6m from the site boundary;</i> 2. <i>Provided that none of the structures listed in (1) (c) to (e) above has a horizontal dimension of over 3m along the line formed where the structure meets the recession plane as measured parallel to the relevant boundary.</i> 3. <i>Where the site is within the Urban Flood Assessment Overlay or Kaiapoi Fixed Minimum Finished Floor Level Overlay, the height of the Finished Floor Level specified in a Flood Assessment Certificate can be used as the origin of the recession plane instead of ground level, but only up to an additional 1m above original ground level.</i>	Support Supportive of the clarification that where a site needs to be raised to address flood hazard that the recession plane can be taken from the certified finished floor level (up to 1m above original ground level).	Retain as Notified
Built Form Standard MRZ-BFS8 Fencing	<i>All fencing or walls fronting the road boundary; or within 2m of a site boundary with a public reserve, walkway or cycleway, shall be:</i> a. <i>no higher than 1.2m above ground level; or</i>	Oppose The PWDP introduces new fencing requirements for the residential zones that	Amend BFS8 (2) so that where a fence within 5m of an accessway is greater than 0.9m in

	<i>b. no higher than 1.8m above ground level where at least 45% of the fence is visually permeable.</i> <i>2. Any fence or wall greater than 0.9m in height above ground level shall be at least 45% visually permeable as depicted in Figure GRZ-2, within 5m of any accessway, or within the structure and vegetation set back area shown in Figure GRZ-1.</i>	were not previously within the WDP (except for within residential zones that were added as part of plan changes to the WDP). The proposed fencing requirements are overly restrictive (particularly those in (2) which apply to any fence adjacent to an accessway (which includes a private right of way and access lot).	height it is at least 35% visually permeable (instead of 45%).
Commercial and Mixed Use Zones- Whaitua Arumoni (CMUZ)			
Policy CMUZ-P1 Centre function, role and hierarchy	<i>Ensure commercial growth and activities are focused within a hierarchy of commercial centres to support a compact urban form, consistent with their role and function that supports and maintains:</i> <i>1. town centres as the District's principal employment and commercially focused areas, and the primary focal point for community and other activities at the highest density of development;</i> <i>2. local centres which provide for a range of activities to meet the daily/weekly shopping needs of residential or nearby rural areas, while protecting the role and function of the town centres;</i> <i>3. neighbourhood centres which provide for a range of small-scale activities to meet the mainly convenience needs of immediate residential neighbourhoods, while protecting the role and function of the town and local centres; and</i> <i>4. the existing commercial centre within Belfast/Northwood in the Christchurch District.</i>	Support General support for the local centre role of which the commercial lot in Bellgrove North is to be zoned given it will 'provide for a range of activities to meet the daily/weekly shopping needs of residential or nearby rural areas'.	Retain as Notified
Policy CMUZ-P3 New Local and Neighbourhood Centres	<i>Provide for new Local and Neighbourhood Centres in identified development areas as specified on ODPs, where these:</i> <i>1. support the role and function of Town Centres, and do not undermine investment in public amenities and facilities in Town and Local Centres;</i> <i>2. achieve the Local or Neighbourhood Centre's identified function, scale and role; and</i> <i>3. provide a safe and efficient transport system which is integrated with the centre.</i>	Support General support for the inclusion of the commercial lot in Bellgrove North as a future local centre in accordance with the North Rangiora ODP.	Retain as Notified
<u>Local Centre Zone</u>			
Objective LCZ-01 Local Centre Zone activities	<i>Local Centres:</i> <i>1. are the focal point for a range of commercial, community and service activities at a smaller scale than Town Centres to provide for the daily/weekly shopping needs of the local residential or nearby rural area, including enabling a range of convenience activities;</i> <i>2. activities do not adversely affect the role and function of Town Centres; and</i> <i>3. amenity values are managed within the zone and at the interface with adjacent residential zones.</i>	Support General support of the role of the local centre but note that convenience activities are not defined. Clarification could be made to refer to the permitted activities within the zone rules.	Amend to clarify what is meant by convenience activities.
Policy LCZ-P1 Design and Integration	<i>Within Local Centres:</i> <i>1. enable commercial, community, convenience and service activities that provide for the daily/weekly shopping needs of the local residential or nearby rural catchment and do not adversely affect the role and function of Town Centres, nor undermine investment in their public amenities and facilities;</i> <i>2. enable a range of Local Centres which, excluding the Woodend Local Centre, generally comprise 1,000m2 to 4,000m2 total floor space and up to 15 shops with a maximum retail tenancy of 350m2 GFA;</i>	Support in Part Support the overall development outcome sought for the local centre of up to 4,000m² total floor space and that local centres will provide for daily/weekly shopping needs of the local residential catchment. Remove the specificity regarding total shop size and retail tenancy areas or note that the	Amend (2): <i>2. enable a range of Local Centres which, excluding the Woodend Local Centre, generally comprise 1,000m2 to 4,000m2 total floor space and up to 15 shops with a maximum retail tenancy of 350m2 GFA;</i>

	3. ensure Local Centres are integrated into the transport system to promote efficient safe and accessible modal choice, and manage adverse effects on the operation of the transport system; and 4. adverse amenity effects are managed within the zone and at the interface with neighbouring more sensitive zones.	maximum retail tenancy of 350m ² is exclusive of food and beverage outlets (i.e. restaurants).	
Rule LCZ-R1 Construction or alteration of or addition to any building or other structure	Construction or alteration of or addition to any building or other structure is permitted where the activity complies with: - all built form standards (as applicable); and - the building or addition is less than 450m² GFA.	Support in part Support permitted activity status for buildings that comply with all the built form standards. Given the scale of the Local Centre the permitted maximum GFA of a building at 450m² is quite small, and noting that other rules are in place to limit maximum retail activity tenancy sizes (i.e. Built Form Standard LCZ-R4)	Amend Criterion 1(b) to be less than 1,000m ² GFA.
Rule LCZ-R4 Retail Activity	Retail activity is permitted where: - the floor area of the activity shall be within the following maximum GFA limits: - within Woodend there is no limit; - for Mandeville, the maximum gross retail area for all retail activities in the zone shall be 2700m²; - for all other sites the activity shall be a maximum of 300m² GFA. Activity status when compliance not achieved: RDIS <u>Matters of discretion CMUZ-MD11 – Residential development:</u> 5. In relation to any proposed non-residential activities: a. the extent to which the activity will adversely affect residential amenity values, including consideration of: - character, duration, scale and intensity; - hours of operation; - noise from patrons onsite and those arriving and leaving; - traffic generation and vehicle movements, including servicing vehicles; and - any proposed measures that mitigate adverse effects by means such as the provision of screening, buffer areas, local topography, site layout (including location of point of sale) or operational practices. <u>Matters of Discretion CMUZ-MD12 – Commercial activity distribution</u> Commercial activity distribution - If a Local Centre, the extent to which the activity adversely affects the role, function and capacity of the nearest Town Centre to provide for primarily commercial and community activities. - If a Neighbourhood Centre, the extent to which the activity adversely affects the role, function and capacity of the nearest Town and Local Centre to provide for primarily commercial and community activities. - Any adverse effects on the amenity values and streetscape of the site, especially where sites have frontage to a principal shopping street. - Effects, including traffic generation, that affect daily operation and amenity of the nearest town centre.	Support in Part Retail activity ‘means any land, building or part of a building on or in which goods are displayed, sold, or offered for sale or hire direct to the public and includes: - food and beverage outlet; - second hand goods outlets; - commercial mail order or internet-based transactions; and - large format retail.’ There will be some retail activities (e.g. a neighbourhood restaurant and/or bar) that are food and beverage outlets which will exceed a GFA of 300m² triggering the need to obtain consent as a restricted discretionary activity. These are covered separately under Built Form Standard LCZX-R16 and this should be referenced in the rule for clarity.	Amend the criterion (c): for all other sites the activity shall be a maximum of 300m² GFA <u>(excluding food and beverage outlets which are covered separately under Built Form Standard LCZ R16).</u>

Rule LCZ-R7 Office	Office is permitted where the floor area of the activity shall be a maximum of 300m2 GFA.	Support Support the identification of office activity within the Local Centre Zone at a scale less than 300m² in area for each office to be a permitted activity.	Retain as Notified
Rule LCZ-R16 Food and Beverage Outlet	Food and beverage outlet are permitted where: - the floor area of the activity shall be within the following maximum GFA limits: - within Woodend there is no limit; - for all other sites the activity shall be a maximum of 300m2 GFA. Activity status when compliance not achieved: RDIS <u>Matters of discretion CMUZ-MD11 - Residential development:</u> - In relation to any proposed non-residential activities: - the extent to which the activity will adversely affect residential amenity values, including consideration of: - character, duration, scale and intensity; - hours of operation; - noise from patrons onsite and those arriving and leaving; - traffic generation and vehicle movements, including servicing vehicles; and - any proposed measures that mitigate adverse effects by means such as the provision of screening, buffer areas, local topography, site layout (including location of point of sale) or operational practices. <u>Matters of Discretion CMUZ-MD12 - Commercial activity distribution</u> Commercial activity distribution - If a Local Centre, the extent to which the activity adversely affects the role, function and capacity of the nearest Town Centre to provide for primarily commercial and community activities. - If a Neighbourhood Centre, the extent to which the activity adversely affects the role, function and capacity of the nearest Town and Local Centre to provide for primarily commercial and community activities. - Any adverse effects on the amenity values and streetscape of the site, especially where sites have frontage to a principal shopping street. Effects, including traffic generation, that affect daily operation and amenity of the nearest town centre.	Support in part Food and beverage outlet is defined as ‘the use of land, buildings, vessels or other structures primarily for the sale of food or beverages prepared for immediate consumption on or off the premises to the general public. It includes restaurants, bars, taverns, cafes and takeaway bars and drive through restaurants, but excludes supermarkets’. Support the identification of food and beverage outlets as a permitted activity but consider that a maximum GFA of 300m² is too restrictive for a local restaurant and/or bar).	Amend criterion 1(b) to enable food and beverage outlets up to 500m² in size as permitted.
Built Form Standard LCZ-BFS1 Height	1. The maximum height of any building, calculated as per the height calculation, shall be 10m above ground level	Oppose The medium density residential and general residential zones have a maximum height limit of 12m. The Local Centre Zone should be at a minimum consistent with this height.	Amend LCZ-BFS1: <i>The maximum height of any building, calculated as per the height calculation, shall be 10 12m above ground level</i>
Built Form Standard LCZ-BFS4 Internal Boundary Landscaping	1. Landscaping shall be provided along the full length of all internal boundaries that adjoins Residential Zones, Rural Zones, or Open Space and Recreation Zones. This landscape strip shall be a minimum of 2m deep.	Oppose A 2m wide landscape strip is a substantial width to require along an internal boundary. A 1m width would be more appropriate, especially noting that Built Form Standard LCZ-BFS3 requires a building to be setback	Amend LCZ-BFS4: <i>Landscaping shall be provided along the full length of all internal boundaries that adjoins Residential Zones, Rural Zones, or Open Space and Recreation Zones. This</i>

	2. Any landscape strip required in (1) shall include a minimum of one tree for every 10m or part thereof, spaced at a maximum distance of 5m of shared boundary, with the trees to be a minimum of 1.5m in height at time of planting	3m from an integral boundary. This in combination would create a suitable boundary interface.	landscape strip shall be a minimum of 2m 1m deep.
Built Form Standard LCZ-BFS5 Road Boundary Landscaping	1. Where a site is not built to a road boundary, landscaping shall be provided along the full length of the road boundary, except for vehicle crossings, outdoor seating or dining areas. This landscape strip shall be a minimum of 2m deep. 2. The landscape strip required in (1) shall include a minimum of one tree for every 10m of road frontage or part thereof, spaced at a maximum distance of 5m, with the trees to be a minimum of 1.5m in height at time of planting. Activity status when compliance not achieved: RDIS	Oppose A 2m wide landscape strip is a substantial width to require along the road frontage of a site. A 1m width would be more appropriate.	Amend LCZ-BFS5: Where a site is not built to a road boundary, landscaping shall be provided along the full length of the road boundary, except for vehicle crossings, outdoor seating or dining areas. This landscape strip shall be a minimum of 2m 1m deep.
Built Form Standard LCZ-BFS6 Road boundary setback, glazing and verandah	1. All buildings shall: - be built to the road boundary; - provide pedestrian access directly from the road boundary; - have visually transparent glazing for a minimum of 60% of the ground floor elevation facing the road; - have a verandah that extends along the full length of the building elevation facing the road; - verandahs are to extend a minimum of 3m from the building façade; and - verandahs are to be set back a minimum of 0.5m from the kerb line of a public road. This rule does not apply to pedestrian laneways. The minimum depth of 3m required under (e) may be reduced where necessary to comply with this rule. Activity status when compliance not achieved: RDIS <u>Matters of Discretion: CMUZ-MD7 Road boundary setback, glazing and verandah</u> - The extent to which the activity: - provides for continuity of façades and verandah coverage along the street frontage; - provides visual interest appropriate to the context and character of the site and surrounds; - incorporates architectural variation into the façade and building form to provide interest and to break up the bulk of a building; - provides for main entrances, verandah coverage, openings and display windows onto the street, and maintains clear and visible visual and physical connections between the interior of a building and public spaces; - provides for functional and quality space for public amenity and accessibility, such as for outdoor dining or retail laneways, and contributes to the functional width of a public footpath, without compromising the overall character of the street frontage and its continuity; - results in the visual dominance of vehicles through the use of space between the building and the street for car parking, vehicle manoeuvring or loading; - maintains transport safety through not extending verandahs over the active road carriageway; - reduces amenity and visual streetscape values, especially where the frontage is to an arterial road or collector road; - adversely affects the amenity and outlook of residential, rural, or open space and recreation zones; - presents a visually attractive frontage to the street through the inclusion of glazing, ancillary offices, and retail showrooms in the front façade; and	Oppose LCZ-BFS6 contradicts LCZ-BFS5 given it requires a building up to the road boundary but doesn't refer to the alternative landscaping approach if this is not achieved. This rule does not consider design outcomes for commercial allotments such as the one proposed for Bellgrove Stage 1 which will have both a road boundary and a boundary facing the Northern Flow Channel open space reserve. In this case the site does not have a classic 'back of house' area from which to reduce the glazing extent to ensure workable internal floor area. This needs to be considered in the matters of discretion that are triggered when a building is not built directly up to a road frontage. The matters of discretion also do not include operational and functional requirements of an activity which may limit the ability to comply with LCZ-BFS6 and LCZ-BFS5.	Amend LCZ-BFS6: All buildings shall: - be built to the road boundary; <u>or comply with the landscaping requirements of LCZ-BFS5 above;</u> - provide pedestrian access directly from the road boundary... Include within the matters of discretion (CMUZ-MD7) site opportunities where other boundaries may be more desirable to have as the primary frontage. For example an additional matter could be: <u>l. consideration of other frontages to the commercial lot and how this may impact lot layout (i.e. boundaries with public open space areas and/or open space reserve).</u> Include within the matters of discretion (CMUZ-MD7) operational and functional requirements: <u>k. consideration of specific operational and functional requirements of an activity.</u>

	<i>k. mitigates the visual effects of a reduced setback through site frontage landscaping and the character of existing building setbacks in the wider streetscape.</i>		
Built Form Standard LCZ-BFS8 Outdoor Storage Areas	<i>1. Any outdoor storage or parking areas shall be screened by 1.8m high solid fencing or dense hedge landscaping from any adjoining site in Residential Zones, Rural Zones, Commercial and Mixed Use Zones or Open Space and Recreation Zones or the road boundary.</i>	Oppose Parking areas work best where they are visible (rather than obscured).	Amend LCZ-BFS8: <i>Any outdoor storage or parking areas shall be screened by 1.8m high solid fencing or dense hedge landscaping from any adjoining site in Residential Zones, Rural Zones, Commercial and Mixed Use Zones or Open Space and Recreation Zones or the road boundary.</i>
Development Areas – Wāhanga waihanga			
<u>North – East Rangiora Development Area</u>			
North-East Rangiora Development Area Objectives and Policies	Objective DEV-NER-01: Development Area <i>North East Rangiora Development Area contributes to achieving feasible development capacity for residential activities.</i> Policy DEV-NER-P1: Future urban development <i>Provide for future urban development in a Development Area (in accordance with DEV-NER-APP1 - North East Outline Development Plan) through a certification process by the Chief Executive Officer or their delegate when:</i> <i>1. the development will provide additional residential capacity to help achieve or exceed the projected total residential demand as identified in UFD-O1 (for the medium term);</i> <i>2. water supply, wastewater and stormwater infrastructure capacity is sufficient to support the proposed development; and</i> <i>3. an agreement is in place between the District Council and the developer on the method, timing and funding of any necessary water supply, wastewater and stormwater infrastructure, open space and transportation infrastructure.</i> Policy DEV-NER-P2: Subdivision and activities <i>Only allow subdivision and activities where:</i> <i>1. after certification by the Chief Executive Officer or their delegate, it is in accordance with the objectives, policies and rules of the Medium Density Residential Zone, Local Centre Zone and the relevant District wide provisions; and</i> <i>2. prior to certification by the Chief Executive Officer or their delegate, it will not undermine or inhibit the future development of the Development Area as per the North East Rangiora Outline Development Plan</i>	Support in part Generally, in support of the proposed objectives and policies identified for the North East Rangiora Development Area. 'Policy DEV-NER-P2: Subdivision and activities' does not include consideration of the General Residential Zone rules. General residential density is identified in the Outline Development Plan and the supporting text (i.e. DEV-NER-R1) and consequently should be referred to in this Policy for consistency.	Amend Policy DEV-NER-P2 to include: Only allow subdivision and activities where: <i>1. after certification by the Chief Executive Officer or their delegate, it is in accordance with the objectives, policies and rules of the General Residential Zone, Medium Density Residential Zone, Local Centre Zone and the relevant District wide provisions; ...</i>
North East Rangiora Development Area – Introduction	<i>Urban development within a Development Area is managed through a certification process, where land is released for development by the Chief Executive Officer or their delegate, once identified criteria are met. The future urban development provisions for a Development Area is identified through the Development Area name on the Outline Development Plan. Once development of these areas has been completed, the District Council will remove the Development Area layer and rezone the area to the appropriate zones.</i>	Support in part Generally, in support of the proposed certification process to release land within the North East Rangiora Development Area for future urban development.	Retain as Notified
Development Area Standards	<i>1. The following criteria must be demonstrated to be met for the District Council's Chief Executive Officer or their delegate to certify to enable urban development (subdivision and land use activities) in the North East Rangiora Development Area:</i>	Support in part Supportive of the certification process and criteria, including the advice note DEV-NER-	<i>2. If a s224 certificate under the RMA has not been granted by the District Council within three years of the date of certification,</i>

DEV-NER-S1 Certification for North East Rangiora Development Area – Criteria	a. the development will provide additional residential capacity to help achieve or exceed the projected total residential demand as identified in UFD-O1 (for the medium term) as indicated by the most recent analysis undertaken by Council in accordance with the NPSUD and published on the District Council website; and b. residential development within the North East Rangiora Development Area will meet all the following criteria, demonstrated by modelling using accepted industry practice: i. firefighting flows within the piped treated water network servicing 95% of the Development Area will meet the SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice; ii. on-demand water schemes will need to have capacity to deliver greater than 2500 litre connections per day at peak demand; iii. water pressure within the piped treated water network servicing the Development Area is maintained at greater than 250kpa 100% of the time, and greater than 350kpa 95% of the time; and iv. surcharge of pipes and flooding out of manholes will not occur during a design rainfall event (20% AEP) within the stormwater network necessary for the servicing of potential development that is being released; c. a geotechnical assessment and flood assessment for the area has been prepared for this area and any identified risks contained within the assessments can be mitigated as part of subdivision design and consent; d. there is sufficient capacity available within the Rangiora Wastewater Treatment Plant for this development; e. a stormwater assessment has been developed for this area and any recommendation contained within the assessment is agreed by Council; f. a transport effects assessment has been developed for this area and any recommendations contained within the assessment can be mitigated as part of subdivision design and consent; g. a staging plan including: i. the amount of new residential sites created in the development subject to the application for certification; ii. number of stages for the development; and iii. how many sites will be created per stage; h. an agreement between the District Council and the developer on the method, timing and funding of any necessary infrastructure and open space requirements is in place. 2. If a s224 certificate under the RMA has not been granted by the District Council within three years of the date of certification, certification shall cease to apply. Advice Note: DEV-NER-AN1 - Development areas may be certified in whole or in part, and where more areas are requested to be released than can meet the criteria of the certification process, they will be released in accordance with the staging plan.	AN1 which clarifies that the certification process can apply in whole or part to the development area. Greater clarification is sought to criterion (2) to ensure that as per the advice note (that certification can occur in part) that likewise the s.224 process can also occur in part. This has been previously discussed with WDC given there are concerns certification could lapse which would require landowner to make a fresh essentially duplicate application for another certification causing unnecessary delay and expense. Question the relevance of (1) as a criterion given any development would help contribute to additional residential capacity to help achieve projected total residential demand.	certification shall cease to apply. <u>For clarity s.224 certificates can be sought in part</u>
North East Rangiora Outline Development Plans Option A and Option B	There are two development options for the North East Rangiora Development Area, and the realisation of one option over the other is likely to take some time and is subject to agreement between all the relevant landowners and parties involved. The key difference between the options is the exact location of the education precinct. If this shifts slightly north from its current location, as per Option A, there are implications for a number of other development features predominantly present in the western portion of the North East Rangiora Development Area. Other Outline Development Plan development	Oppose BRL seek deletion of Option A for the North East Rangiora Development Area given this option is no longer available due to the outcome of discussions with the High School. This will assist in simplifying the proposed WDP for users and readers moving forward.	Proceed with only one ODP option for North-East Rangiora ODP (Option B). Remove reference Option A in the plan set and supporting text. Delete introduction text on the two options. <i>There are two development options for the North East Rangiora Development Area, and</i>

	features remain largely unaffected. The below sections identify where there are specifically different development outcomes under the two options.		the realisation of one option over the other is likely to take some time and is subject to agreement between all the relevant landowners and parties involved. The key difference between the options is the exact location of the education precinct. If this shifts slightly north from its current location, as per Option A, there are implications for a number of other development features predominantly present in the western portion of the North East Rangiora Development Area. Other Outline Development Plan development features remain largely unaffected. The below sections identify where there are specifically different development outcomes under the two options.
Appendix DEV-NER-APP1 - North East Rangiora Outline Development Plan Land Use Plan	<i>The Outline Development Plan for the North East Rangiora Development Area provides for a variety of site sizes. Medium density residential activity is located in the general south/southwest portion of the Development Area, closest to the Rangiora town centre, and immediately adjacent to a neighbourhood/local centre, shown in the Outline Development Plan as commercial/business, located at the key north/south primary road that connects Kippenberger Avenue to Coldstream Road. This maximises opportunities for walking/cycling proximity to local amenity and services, and enables access to local convenience goods and services to a maximised proportion of the Development Area’s resident population which has positive flow-on effects on neighbourhood businesses’ sustainability. ...</i> <i>For both options, the location of these medium density residential areas are fixed in the Outline Development Plan. This requires a concentration of medium density in these locations, meaning a minimum ratio of 70% medium density residential zone density and maximum of 30% general residential zone density. Additionally, medium density residential development could be located adjacent to the Rangiora Golf Course at the north-eastern edge of the Development Area, as well as adjacent to any internalised stormwater management areas or open space reserves, such as shown in the north-eastern reserve. This takes advantage of opportunities to overlook such high amenity features and offset limited private outdoor space feasible in medium density residential development. The Medium Density Residential Zone enables a minimum lot size of 200m2 while the General Residential Zone enables a minimum lot size of 500m2. Overall, the North East Rangiora Development Area shall achieve a minimum residential density of 15 households per ha, unless there are identified constraints to development, in which case no less than 12 households per ha shall be achieved.</i> <i>The neighbourhood/local centre is strategically located to take advantage of high visibility, activity and traffic flow, including public transport, generated by the north/south primary road, in a location to which the medium density residential activity in this vicinity connects well. The co-location of the neighbourhood/local centre with a flow path in both development options offers opportunities for the commercial activity, particularly hospitality, to benefit from adjacent high amenity natural features. For these reasons, this is a fixed component of the Outline Development Plan. ...</i> <i>The historic Belgrove farmhouse and setting, located at 52 Kippenberger Avenue, has historic heritage value and is protected under the District Plan as a heritage site (HH052).</i> <i>Development within the North East Rangiora Development Area is to be contiguous; the Outline Development Plan does not anticipate physically separated or ad-hoc development.</i>	Support in part This Land Use text suggests that within areas identified for ‘Medium Density Residential’ a minimum ratio of 70% medium density residential zone density and maximum of 30% general residential zone density should be achieved. BRL are supportive of this ratio but consider that the labelling of this area as ‘Medium Density’ is confusing and visually suggests that all lots within this area on the ODP are to be less than 500m². Support the inclusion that where identified constraints to development are present that a reduced density of 12 households per ha is achieved. This is especially supported for areas such as the Stage 1 development where the homestead heritage item and the existing overland flow path restrict potential lot layouts.	Revise the label used on the Outline Development Land Use Plan so it is clearer that within the ‘Medium Density’ area 30% of the that area can be developed to the general residential standards. Amend the Land Use Plan for the North East Rangiora ODP as per Attachment 3B to this submission. Remove reference to a neighbourhood centre in the land use text.

Appendix DEV-NER-APP1 - North East Rangiora Outline Development Plan Movement Network	<i>The Outline Development Plan for the North East Rangiora Development Area provides access to this growth area through a network of primary and secondary roads that ensure development integration, efficient traffic management and public transport corridors. Only these more significant roads are identified in the movement network plan. The layout of additional tertiary roads to service the residential areas will respond to detailed subdivision design of those areas. The specific roading classification of all roads will be ultimately determined at the time of development, to provide flexibility and the ability to match the eventual roading classification system made operative through the District Plan. Primary and secondary roads for the North East Rangiora Development Area are located to ensure that all existing parcels of land, when developed, can be served by the roading network.</i> <i>A key movement network feature for the North East Rangiora Development Area is a main north/south primary road which forms part of a wider future key Rangiora eastern north/south road connection that extends southward through the Rangiora North East Development Area and beyond to connect to Lineside Road. This road's entry into the North East Rangiora Development Area is fixed at the site of 76 Kippenberger Ave, to enable it to connect to MacPhail Avenue south of Kippenberger Avenue. The latter has been installed at a configuration that future-proofs it to fulfil this wider roading function. The northern exit of this north/south primary road connection must intersect with Coldstream Road between the District Council's Multi Sports Facility site at the northwest of the Development Area, and the Golf Course at the northeast of the Development Area. This primary road will be suitable for public transport, and will include separated shared pedestrian and cycle paths to allow for active modes. Its design will promote reduced vehicle speeds and increased safety to other street users. Rear access for driveways must be provided to new properties immediately adjoining the separated shared use path to avoid vehicle/cyclist/pedestrian conflict. The installation of an appropriate intersection with Kippenberger Avenue and MacPhail Avenue will be required, as well as at its exit to Coldstream Road.</i> <i>Intersecting the main north/south primary road will be a number of secondary roads, to provide subdivision structure and logical east/west movement corridors for vehicles, pedestrians and cyclists. Secondary roads generally assume a form which is of a more residential nature and cater less to through vehicle traffic. A fixed component of the movement network is a secondary road that connects the north/south primary road with East Belt in the west, and includes cycling facility. This optimises opportunities foreshadowed in the District Council's Rangiora Town Centre Strategy, which anticipates an enhanced pedestrian/cycling connection between the centre's north-eastern 'Station Corner' precinct and the residential growth area through a possible additional crossing over the railway to connect to Keir Street. It also strengthens the close proximity between the North East Rangiora Development Area and the Rangiora town centre.</i> <i>A secondary road connection into the North East Rangiora Development Area from the south is located west of Devlin Avenue, which extends into the South East Rangiora Development Area.</i> <i>As well as cycleways at key roading corridors, the network of cycling infrastructure for the North East Rangiora Development Area includes cycleways along the two flow paths and references the wider cycling network beyond the Development Area.</i> <i>Pedestrian footpaths will be provided on at least one side of each road. The movement network plan should be read in conjunction with the green network plan which also provides informal cycling and walking corridors, such as along green links. The principle of walkability is incorporated through the use of a connected roading pattern, additional pedestrian links and the location of open spaces.</i>	Support in Part Generally, support the location of the primary and secondary roads in the North East Rangiora ODP Movement Plan and support that this plan only shows the more significant roads for this area. While the specific roading classification is ultimately determined at the time of development (to provide flexibility and the ability to match the eventual roading classification system made operative through the District Plan) this has the potential to create confusion over what is meant by 'secondary road', but given this plan only identifies 'more significant roads' for the area, it is assumed that this would be designed to operate as a 'Collector Road' standard, or similar. For example, it is currently unclear what road design standards should be applied to the formation of these roads (i.e. how to apply TRAN-R3 provisions – 'formation of a new road'). A minor amendment is sought to the alignment of the secondary road connection south-west of Devlin Avenue given it does not reflect the proposed roading layout for Bellgrove Stage 1. The secondary road connection is proposed further to the west to ensure the spacing between the intersection with Devlin Avenue complies with PWDP minimum road intersection separation distance listed in TRAN-S2 of 125m. A minor amendment is also sought to the primary road connection to Golf Links Road to better reflect the proposed layout of Bellgrove proposed for Stages 2-3.	Amend the Movement Network Plan for the North East Rangiora ODP as per Attachment 3C to this submission. Clarify that 'significant' road (any road identified on an ODP) is to be classified at a minimum as a 'Collector Road'.
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	<i>of development of properties at the eastern edge of the site along Golf Links Road. All stormwater basins for the North East Rangiora Development Area are assumed could be dry basins, allowed by well-draining land. Alternative solutions for stormwater management could be proposed, provided the flow of water into the Taranaki Stream and Cam River are maintained and all future lots in the stormwater catchments can discharge into the appropriate basins.</i> <i>Stormwater reserves provide attractive open space and visual relief in a built up residential environment, and can present opportunities for residential development adjacent to them to look out onto it and benefit from their amenity. Stormwater management reserves can also have a passive recreational purpose for walking, cycling and playing. Streams, springs and waterways are protected and included in the stormwater reserves where relevant. All stormwater ponds are subject to design detailing, but will be managed by an appropriately designed stormwater treatment system with high amenity values. The Outline Development Plan for the North East Rangiora Development Area provides an indicative size and location based on likely catchments around the key infrastructure.</i>	Kippenberger Avenue, Rangiora (Lot 1 DP 79128). Amendment sought to remove the green link shown to the north of the ODP area. This does not align with any flow channel and/or proposed roading alignment.	<i>lots in the stormwater catchments can discharge into the appropriate basins.</i>
Appendix DEV-NER-APP1 - North East Rangiora Outline Development Plan Water and Wastewater Network	<i>The provision of reticulated water supply assumes a skeleton network for the North East Rangiora Development Area, where only water pipes 100mm in diameter and greater are specified. The exact location of the reticulation may change when road layouts are confirmed, noting that some identified road locations as specified under ‘Movement Network’ are fixed and others are flexible.</i> <i>Reticulation upgrades proposed for Rangiora are both within Development Areas (East, North East and West) and within the existing network. Due to their location, all of the existing network upgrades can be attributed to the Development Areas. Source and headworks upgrades are not Development Area specific, rather they apply to the whole scheme.</i> <i>A number of water network upgrades and constructions are required to service the Rangiora North East Development Area’s three catchments. Reticulation requirements include upgrades to the existing network and extra over upgrades to development reticulation. These upgrades are required to maintain the existing levels of service to current and future customers. Requirements include new pipes and upgrades related to the East Belt Booster Main, East Rangiora Northern Link Main, North Northeast and Northeast Rangiora Supply Main, East Rangiora Northern Link Main, and Northbrook Road Booster Main.</i> <i>Development in the Rangiora West, North East and East Development Areas also contribute to the requirement to upgrade a number of wider Rangiora sources and headworks, such as additional wells and associated pipework at Rangiora Source, new Surface Pumps and Generator at Ayers Street Headworks, new reservoirs at Ayers Street and South Belt, and a new Surface Pump at South Belt Headworks.</i> <i>Three catchments make up the North East Rangiora Development Area for wastewater servicing requirements. Each catchment has an independent solution for wastewater infrastructure and only the key trunk infrastructure and pumpstations/rising mains are shown. The lay of the land is generally towards the south east, and developments reticulation would be installed with the lay of the land. Mains will follow general alignment with the roading network. There is sufficient capacity in the existing network to service the catchment that forms roughly the western half of the North East Rangiora Development Area, which can be discharged into the existing pipeline along MacPhail Avenue. A small catchment at the southeast of the North East Rangiora Development Area can be discharged into the existing pipeline along Devlin Avenue, provided the pipeline is extended to Northbrook Road. A third large catchment to the east of the Development Area requires a new pumpstation at the south-eastern point of the Development Area and pumped into a new rising</i>	Oppose in Part The new pumpstation required to serve the North-East Rangiora development area referred to in the south-eastern corner of the site is incorrectly shown on Golf Links Road near the intersection with Rangiora Woodend Road. Instead this will be located within 52 Kippenberger Ave (Part RS 267) and established as part of Stage 1 of Bellgrove just to the north of Kippenberger Avenue (west off the intersection with Devlin Avenue). The plan and the text enclosed with the ODP should be modified to reflect this. The notified water and wastewater plan requires an update to reflect the proposed Stage 1 utility layout (based off the proposed subdivision road layout). In addition the proposed new water main shown through the golf course (85 Golf Links Road /RS 41080) should be removed and amended by the marked up plan enclosed to demonstrate how development of this ODP area can occur without being reliant on works within this land. A minor amendment is sought to the text in the last paragraph. Instead of the wastewater being pumped into a new rising main to Northbrook Road it will be pumped directly from the pump station to the Southbrook Wastewater Treatment Plant (WWTP). Amendments are suggested to this paragraph as shown.	Amend the Water and Wastewater Plan for the North East Rangiora ODP as per Attachment 3E to this submission. Amend the text as follows: <i>A third large catchment to the east of the Development Area requires a new pumpstation at the south-eastern point of the Development Area <u>which will pump from there direct</u> and pumped into a new rising main to Northbrook Road, where it would join onto a rising main to the treatment plant.</i>

	main to Northbrook Road, where it would join onto a rising main to the treatment plant.		
Ranoigra North East Rangiora Outline Development Plan Overall	Option A  Option B 	Support in Part Several improvements and subtle changes are sought to the notified ODP. This plan summarises those already described above. Option A is no longer required and should be deleted to reduce confusion and improve readability of the PWDP.	Delete ODP Option A. If Option A is to be retained, then amend the overall plans for Option A and B as per Attachment 3A to this submission.
Fixed Outline Development Plan Features for the North East Rangiora Development Area:	Fixed Outline Development Plan Features for the North East Rangiora Development Area: - Location of a concentration of medium density residential activity (meaning a minimum ratio of 70% medium density residential zone density and a maximum 30% general residential zone density) in the southwest of the Outline Development Plan (Option A) or south of the Outline Development Plan (Option B) as well as immediately adjacent to the local/neighbourhood centre - Location of roading connection of north/south road to MacPhail Avenue at Kippenberger Avenue - A road to connect the new north/south road to East Belt - A road to connect the new north/south road to Golf Links Road - Location of flow paths and adjoining green links and cycleways, including any required waterbody setbacks - Location of the local/neighbourhood centre at the north/south road corridor, in proximity to a flow path - Separated shared pedestrian / cycleway at the north/south road corridor	Oppose in part The location for the medium density and general residential development should not be a fixed feature, enabling the developer to determine where the different densities of residential development are best placed within the site. This is in accordance with the amendments sought to the plan for these to be superseded as a general 'residential' area/ All ODP text should refer to the commercial centre being a 'local centre' for consistency. Reference to an Option A and Option B land use outcome should be removed (all Option B plans should simply be referred to as the plan).	Ensure the commercial centre within the North - East Rangiora ODP is referred to as a local centre. Reword the text to be: - Location of a concentration of medium density residential activity (meaning a minimum ratio of 70% medium density residential zone density and a maximum 30% general residential zone density) in the southwest of the Outline Development Plan (Option A) or south of the Outline Development Plan (Option B) as well as immediately adjacent to the local/neighbourhood centre - Location of the local/neighbourhood centre at the north/south road corridor, in proximity to a flow path
Activity Rules if Certification has been approved	- DEV-NER-R1 (General Residential Zone) Rules - DEV-NER-R2 (Medium Density Residential Zone) Rules - DEV-NER-R3 (Local Centre Zone) Rules - DEV-NER-R4 (Open Space Zone) Rules - DEV-NER-R5 (Subdivision) Rules	Support Generally supportive of the identification of these rules following certification, including the identification that the proposed commercial lot will be subject to the Local Centre Zone provisions.	Retain as Notified
South – East Rangiora Development Area			
South-East Rangiora Objectives and Policies	Objective DEV-SER-01 Development Area South East Rangiora Development Area contributes to achieving feasible development capacity for residential activities. Policy DEV-SER-P1 Future Urban Development Provide for future urban development in a Development Area (in accordance with DEV-SER-APP1 - South East Rangiora Outline Development Plan through a	Support Generally, in support of the proposed objectives and policies identified for the South East Rangiora Development Area. Note medium density rules are referred to once the development is certified so should also be referred to in Policy DEV-SER-P2 (1).	Reword Policy DEV-SER-P2 (1): after certification by the District Council's Chief Executive Officer or their delegate, it is in accordance with the objectives, policies and rules of the General Residential Zone, Medium Density Residential Zone, Local Centre Zone and the relevant District wide provisions...

	certification process by the District Council's Chief Executive Officer or their delegate when: 1. the development will provide additional residential capacity to help achieve or exceed the projected total residential demand as identified in UFD-O1 (for the medium term); 2. water supply, wastewater and stormwater infrastructure capacity is sufficient to support the proposed development; and 3. an agreement is in place between the District Council and the developer on the method, timing and funding of any necessary water supply, wastewater and stormwater infrastructure, open space and transport infrastructure. Policy DEV-SER-P2 Subdivision and activities Only allow subdivision and activities where: 1. after certification by the District Council's Chief Executive Officer or their delegate, it is in accordance with the objectives, policies and rules of the General Residential Zone, Local Centre Zone and the relevant District wide provisions; and 2. prior to certification by the District Council's Chief Executive Officer or their delegate, it will not undermine or inhibit the future development of the Development Area as per the South East Rangiora Outline Development Plan.		
Development Area Standards	DEV-SER-S1 Certification for South East Rangiora Development Area - Criteria 1. The following criteria must be demonstrated to be met for the District Council's Chief Executive Officer or their delegate to certify to enable urban development (subdivision and land use activities) in the South East Rangiora Development Area: a. the development will provide additional residential capacity to help achieve or exceed the projected total residential demand as identified in UFD-O1 (for the medium term) as indicated by the most recent analysis undertaken by Council in accordance with the NPSUD and published on the District Council website; and b. residential development within the South East Rangiora Development Area will meet all the following criteria, demonstrated by modelling using accepted industry practice: i. firefighting flows within the piped treated water network servicing 95% of the Development Area will meet the SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice; ii. on-demand water schemes will need to have capacity to deliver greater than 2500 litre connections per day at peak demand; iii. water pressure within the piped treated water network servicing the Development Area is maintained at greater than 250kpa 100% of the time, and greater than 350kpa 95% of the time; and iv. surcharge of pipes and flooding out of manholes will not occur during a design rainfall event (20% AEP) within the stormwater network necessary for the servicing of potential development that is being released; c. a geotechnical assessment and flood assessment for the area has been prepared for this area and any identified risks contained within the assessments can be mitigated as part of subdivision design and consent; d. there is sufficient capacity available within the Rangiora Wastewater Treatment Plant for this development;	Support in part Supportive of the certification process and criteria, including the advice note DEV-SER-S1 which clarifies that the certification process can apply in whole or part to the development area. Greater clarification is sought to criterion (2) to ensure that as per the advice note (that certification can occur in part) that likewise the s.224 process can also occur in part. This has been previously discussed with WDC given there are concerns certification could lapse which would require landowner to make a fresh essentially duplicate application for another certification causing unnecessary delay and expense. Question the relevance of (1) as a criterion given any development would help contribute to additional residential capacity to help achieve projected total residential demand.	If a s224 certificate under the RMA has not been granted by the District Council within three years of the date of certification, certification shall cease to apply. <u>For clarity s.224 certificates can be sought in part A</u>

	e. a stormwater assessment has been developed for this area and any recommendation contained within the assessment is agreed by Council; f. a transport effects assessment has been developed for this area and any recommendations contained within the assessment can be mitigated as part of subdivision design and consent; g. a staging plan including: - the amount of new residential sites created in the development subject to the application for certification; - number of stages for the development; - how many sites will be created per stage; h. an agreement between the District Council and the developer on the method, timing and funding of any necessary infrastructure and open space requirements is in place. 2. If a s224 certificate under the RMA has not been granted by the District Council within three years of the date of certification, certification shall cease to apply.		
Appendix DEV-SER-APP1 - South East Rangiora Outline Development Plan Land Use	<i>The Outline Development Plan for the South East Rangiora Development Area enables the option for some variety of site sizes. Some medium density residential activity could be developed at key locations adjacent to natural flow paths or stormwater reserves, in order to take advantage of opportunities to overlook such high amenity facilities and offsetting limited private outdoor space feasible in higher density residential development. However this component of the Outline Development Plan is flexible and optional and will likely be dictated by development feasibility and market demand in these locations. The Medium Density Residential Zone enables a minimum lot size of 200m² while the General Residential Zone enables a minimum lot size of 500m². Overall, the South East Rangiora Development Area shall achieve a minimum residential density of 12 households per ha.</i> <i>A small optional neighbourhood/local centre, shown in the Outline Development Plan as commercial/business, is located at the juncture of Northbrook Road and Spark Lane. The latter will form part of the future north/south primary road connection that extends northward through the South East Rangiora Development Area and southward to connect to Lineside Road. Locating the neighbourhood/local centre at this strategic location offers a high degree of visibility which has positive flow-on effects on neighbourhood businesses' sustainability.</i> <i>The land in the South East Rangiora Development Area north of an extension of Cassino Street is likely more suitable for urban development than the land south of it, due to the presence of artesian water south of this location, together with modelled effects of a 200 year localised flooding event. Groundwater south of a Cassino Street extension is artesian and close to the surface, which will likely result in more challenging construction of infrastructure.</i> <i>Rangiora New Life School and Southbrook School are located south of Boys Road. It is subject to Ministry of Education consideration whether an additional primary school is required in the South East Rangiora Development Area in the future to service its catchment. It could be feasible that preschool(s) are established in the Development Area. The South East Rangiora Development Area also contains the Northbrook Museum and Rossburn Receptions, a community asset, at Spark Lane.</i> <i>Development within the Rangiora South East Development Area is to be contiguous; the Outline Development Plan does not anticipate physically separated or ad-hoc development.</i>	Oppose in part Extent of the development area needs to be altered to capture the full extent of Bellgrove South by including the whole of Lot 2 DP 452196 in the development area. Support the text that overall, the development area shall achieve a minimum residential density of 12 households per ha. Also support the text flexibility that areas of medium density development will be determined based on layout and market demand provided an overall density outcome of 12 households per ha is achieved. To further assist this flexibility BRL seek that the residential areas simply be labelled 'Residential' as opposed to General Residential and/or 'Medium Density'.	Remove 'General' and 'Medium' density from the Land Use Plan ODP instead referring to all residential areas as 'Residential'. This will then enable developers to choose how to best layout the area to achieve the minimum overall density required. Include the entire extent of Lot 2 DP 452196 in the ODP area. Amend the Land Use Plan for the South East Rangiora ODP as per Attachment 4B to this submission. Remove reference to a neighbourhood centre in the land use text.

Appendix DEV-SER-APP1 - South East Rangiora Outline Development Plan Movement Network	<i>The Outline Development Plan for the South East Rangiora Development Area provides access to this growth area through a network of primary and secondary roads that ensure development integration, efficient traffic management and public transport corridors. Only these more significant roads are identified in the movement network plan. The layout of additional tertiary roads to service the residential areas will respond to detailed subdivision design of those areas. The specific roading classification of all roads will be ultimately determined at the time of development, to provide flexibility and match the eventual roading classification system made operative through the District Plan. Primary and secondary roads for the South East Rangiora Development Area are located to ensure that all existing parcels of land, when developed, can be served by the roading network.</i> <i>A key movement network feature for the South East Rangiora Development Area is an extension of Devlin Avenue at the western boundary of the area connecting to Boys Road, with a green link incorporating a cycling path adjoining the length of it. A new north/south primary road connection off Kippenberger Avenue curves to connect to the existing Northbrook Road portion that runs in a south-eastern direction. This is coupled with also extending the existing Northbrook Road at the south of the existing developed and zoned land and intersecting it through the Devlin Avenue extension to meet the new north/south connection. Feedback provided by local property owners is that the existing bend at Northbrook Road causes dangerous driving conditions, and it is proposed that a small section of Northbrook Road at this location is stopped to allow the new road alignment. A cycleway will also be provided along Northbrook Road, which links into the wider cycling network within and outside of the Development Area.</i> <i>The Outline Development Plan for the South East Rangiora Development Area also identifies the existing MacPhail Avenue and its extension along Spark Lane and to Boys Road as the main north/south primary road which forms part of a wider future key Rangiora eastern north/south road connection that will ultimately extend to meet Lineside Road in the south and meets Coldstream Road in the north through the South East Rangiora Development Area. This primary road will be adjoined by a green link with a cycleway and be suitable for public transport. Its design will promote reduced vehicle speeds and increased safety to other street users. The installation of appropriate intersections with Northbrook Road and Boys Road will be required.</i> <i>East/west movement patterns through a number of secondary roads provide subdivision structure and connectivity, and are integrated with existing roading linkages west of the Development Area. Secondary roads generally assume a form which is of a more residential nature and cater less to through vehicle traffic.</i> <i>As well as cycleways at key roading corridors, the network of cycling infrastructure for the South East Rangiora Development Area includes cycleways along the two key southern flow paths and references the wider cycling network beyond the Development Area.</i> <i>Pedestrian footpaths will be provided on at least one side of each road. The movement network plan should be read in conjunction with the green network plan which also provides key informal cycling and walking corridors, such as along green links. The principle of walkability is incorporated through the use of a connected roading pattern, additional pedestrian links and the location of open spaces.</i>	Oppose in Part The provision of a primary road and a secondary road for the northern portion of the South-East Rangiora ODP area is not an efficient provision of infrastructure layout. Instead a single primary road (with cycleway) that runs as an extension to Devlin Avenue would be more appropriate. While the specific roading classification is ultimately determined at the time of development, to provide flexibility and the ability to match the eventual roading classification system made operative through the District Plan, this has the potential to create confusion over what is meant by ‘secondary road’, but given this plan only identifies ‘more significant roads’ for the area, it is assumed that this would be a designed to operate as a ‘Collector Road’ standard, or similar. For example, it is currently unclear what road design standards should be applied to the formation of these roads (i.e. how to apply TRAN-R3 provisions – ‘formation of a new road’).	Amend the Movement Network Plan for the South East Rangiora ODP as per Attachment 4C to this submission. Clarify that ‘significant’ road (any road identified on an ODP) is to be classified at a minimum as a ‘Collector Road’.
Appendix DEV-SER-APP1 - South East Rangiora Outline Development Plan	<i>The Outline Development Plan for the South East Rangiora Development Area shows three open space reserve locations together with a network of stormwater management areas and green corridors throughout the site.</i> <i>The open space reserves are located strategically in places that are highly prominent, easily accessed and have the ability to add to the character and identity of the</i>	Support in Part Extent of the development area needs to be altered to capture the full extent of Bellgrove South by including the whole allotment of 74	<u>Relief Sought:</u> Amend the Open Space and Stormwater Reserve Plan for the South East Rangiora ODP to include the full extent of 74 Northbrook Road,

Open Space and Stormwater Reserves	<i>development, as well as being within a 500m radius of all residential households in the Development Area. One open space reserve is located east of the new north/south primary road connection off Kippenberger Avenue, and north of a Galatos Street extension, and is connected by green links. Flexibility of the exact location of the reserve is possible, as long as it is accessible within a 500m radius to the north-eastern residential areas in the South East Rangiora Development Area. A second open space reserve is located in the south of the site, east of the Northbrook Stream flow path, and the same philosophy of flexibility in exact location applies. A third optional smaller open space reserve is located further south, east of the Northbrook Waters, adjacent to the extended Spark Lane which will form part of the main north/south primary road. This reserve is proposed in this location to maximise access to, and enjoyment of, the Northbrook Waters reserve which provides community amenity through attractive landscaping and walking/cycling paths. To maximise functionality, accessibility and visibility, open space reserves must be bordered by at least one local road, and a second either local road or public accessway such as a green link.</i> <i>Any required open space reserve should be prioritised in the early stages of a new residential development, and subsequently when further expansion extends beyond the margins of radius and/or resident population guidelines.</i> <i>A network of green links is anticipated throughout the Development Area, including alongside flow paths and connecting key amenity features such as open space and stormwater reserves. Green links provide safe and attractive active mode corridors and play opportunities, can have a role in stormwater management, and offer visual relief from otherwise built up residential areas. Green links must be bordered by at least one road frontage (except in cases where they serve as a short connection strip) to provide appropriate access, visibility, amenity and safety for users. Where green links border both sides of a flow path, one road frontage between both sides is the minimum requirement.</i> <i>There are three flow paths in the South East Rangiora Development Area. Streams, springs and waterways are protected and included in the stormwater reserves where present. Appropriate waterbody setbacks apply where required by the Natural Character of Freshwater Bodies Chapter of the District Plan. Waterbodies must be protected intact, or improved, as part of any development and any potential adverse impacts on the local and receiving waterbody ecology must be mitigated. Where possible, amenity planting will be encouraged together with enhancement of habitat heterogeneity and in-stream conditions to improve stream health, facilitate migrations and promote recruitment. Efforts must be made to ensure any adverse impacts on kēkēwai (waikoura-freshwater crayfish), which are present in the culturally significant mahinga kai area of the Northbrook Stream (the flow path linking Northbrook Road and Boys Road in the Rangiora South East Development Area), are avoided.</i> <i>A network of stormwater reserves are identified for the South East Rangiora Development Area to respond to five stormwater catchments: just north of Northbrook Road at the eastern edge of the Development Area, north of Boys Road at the south-eastern point of the Development Area, and a small stormwater reserve north of Boys Road south Northbrook Waters, with proposed attenuation basins. The ground in this area is known to have relatively high groundwater and therefore it is assumed that these would all be wet basins.</i> <i>Stormwater reserves provide attractive open space and visual relief in a built up residential environment, and the location of them provide opportunities for adjacent higher density residential areas to look out onto them and benefit from their amenity. Stormwater will be managed by an appropriately</i>	Northbrook Road in the development area (Lot 2 DP 452196). BRL support the flexibility provided that acknowledges that the open space reserve shown north of a Galatos Street extension is flexible dependent on the final subdivision layout design. BRL also support that the stormwater solutions reserves shown are 'indicative' in size given substantially more design work is required to confirm extents and appropriate suitable locations within this area.	Rangiora (Lot 2 DP 452196) as per Attachment 3E to this submission.
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	designed stormwater treatment system with high amenity values. The South East Rangiora Development Area's stormwater catchment discharges to the North Brook. All stormwater ponds are subject to design detailing. The Outline Development Plan for the South East Rangiora Development Area provides an indicative size and location based on likely catchments around the key infrastructure.		
Appendix DEV-SER-APP1 - South East Rangiora Outline Development Plan Water and Wastewater Network	The provision of reticulated water supply assumes a skeleton network for the South East Rangiora Development Area, where only water pipes 100mm in diameter and greater are specified. The exact location of the reticulation may change when road layouts are confirmed, noting that some identified road locations as specified under 'Movement Network' are fixed and others are flexible. Reticulation upgrades proposed for Rangiora are both within Development Areas (East, North East and West) and within the existing network. Due to their location, all of the existing network upgrades can be attributed to the Development Areas. Source and headworks upgrades are not Development Area specific, rather they apply to the whole scheme. A number of water network upgrades and constructions are required to service the South East Rangiora Development Area's four catchments. Reticulation requirements include upgrades to the existing network and extra over upgrades to development reticulation. These upgrades are required to maintain the existing levels of service to current and future customers. Requirements include new mains related to South Belt Booster Main and Boys Road Booster Main. Development in the Rangiora West, North East and South East Development Areas also contribute to the requirement to upgrade a number of wider Rangiora sources and headworks, such as additional wells and associated pipework at Rangiora Source, new Surface Pumps and Generator at Ayers Street Headworks, new reservoirs at Ayers Street and South Belt, and a new Surface Pump at South Belt Headworks. Four catchments make up the South East Rangiora Development Area for wastewater servicing requirements. Each catchment has an independent solution for wastewater infrastructure and only the key trunk infrastructure and pumpstations/rising mains are shown. The lay of the land is generally towards the south east, and developments reticulation would be installed with the lay of the land. Mains will follow general alignment with the roading network. The catchment directly east of Devlin Avenue and north of Northbrook Road requires a new pumpstation at the eastern point of the South East Rangiora Development Area at Northbrook Road and pumping into a new rising main to join onto a shared rising main for the north-eastern catchment (in the Rangiora North East Development Area) to the Rangiora Wastewater Treatment Plant. A second catchment south of Northbrook Road, east of the North Brook Stream discharges into a new proposed booster pumpstation at eastern Boys Road, which discharges into a fourth pumpstation at Boys Road/Spark Lane extension via a new rising main. Finally, two smaller catchments west of the North Brook Stream discharge directly into the fourth proposed pumpstation. It should be noted that artesian water is located roughly south of an extension of Cassino Street in the remainder of the South East Rangiora Development Area, east of Devlin Avenue, and groundwater is close to the surface. This likely makes construction of infrastructure challenging and will likely carry higher than typical costs, particularly when developing large catchment areas. A pressure system may need to be considered for the South East Rangiora Development Area's catchments if gravity reticulation cannot be kept shallow enough. Such considerations will inform development feasibility.	Support in Part The pump station located near the intersection with Golf Links Road / Rangiora Woodend Road / Kippenberger Avenue is incorrect and needs to be updated to reflect the location proposed within Bellgrove Stage 1. The new pump station shown on Northbrook Road should be moved to the north-west. This will be more appropriate given it is located within BRL land and will largely service Bellgrove South. The new watermain should be aligned in accordance with the requested changes to the movement plan (i.e. be aligned with the realigned primary road + cycleway as shown in Attachment 4C).	Amend the Water and Wastewater Network Plan for the South East Rangiora ODP as per Attachment 4D to this submission.

Appendix DEV-SER-APP1 - South East Rangiora Outline Development Plan

Rangiora South East Outline Development Plan – Overall

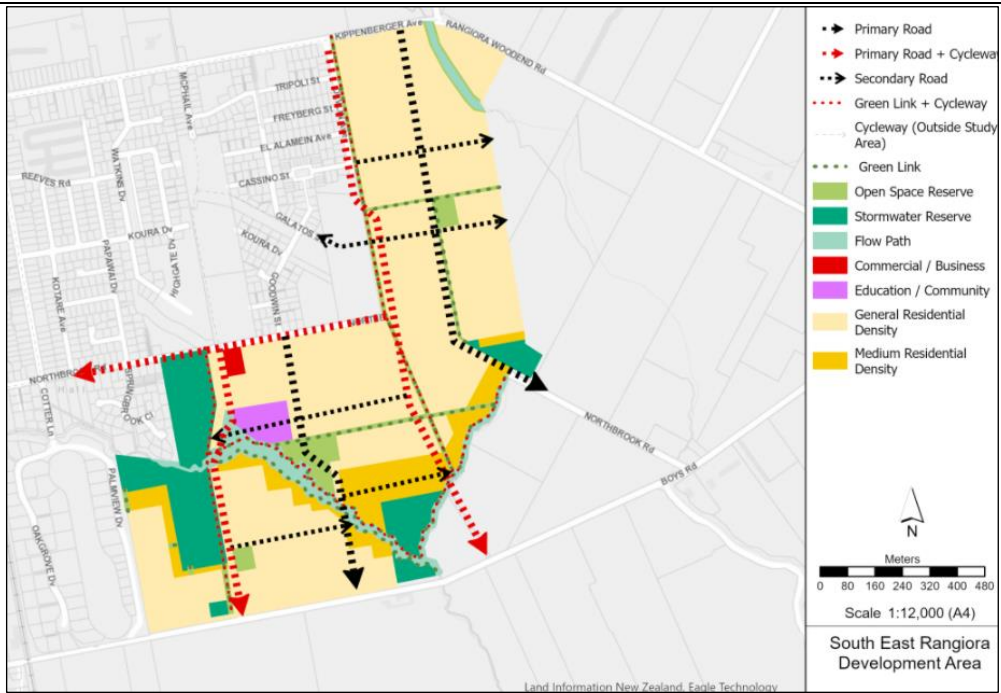


Figure 9. Rangiora South East ODP - Overall

Oppose in Part

Several improvements and subtle changes are sought to the notified ODP. This plan summarises those already described above.

Amend the overall plan for the South-East Rangiora Outline Development Plan area as per **Attachment 4A** to this submission.

Fixed Outline Development Plan Features for the South East Rangiora Development Area

Extension of Devlin Avenue with an adjoining green link containing a cycleway

Extension of Spark Lane to connect to Boys Road with adjoining green link containing a cycleway

Location of new north/south road connecting Kippenberger Avenue with Northbrook Road

Realignment of Northbrook Road to cross Devlin Avenue extension and connect to the new north/south road east of Devlin Avenue

Cycleways at Northbrook Road, Devlin Avenue, and Spark Lane

Location of flow paths and adjoining green links, cycleways, and required water body setbacks

Oppose in Part

Support the location of a new/south road connecting Kippenberger Avenue with Northbrook Road.

Seek the removal of the extension of Devlin Avenue as per changes sought to the movement plan (**Attachment 4C**).

Amend the fixed features:

~~Extension of Devlin Avenue with an adjoining green link containing a cycleway~~

~~Extension of Spark Lane to connect to Boys Road with adjoining green link containing a cycleway~~

~~Location of new north/south road connecting Kippenberger Avenue with Northbrook Road~~

~~Realignment of Northbrook Road to cross Devlin Avenue extension and connect to the new north/south road east of Devlin Avenue~~

~~Cycleways at Northbrook Road, Devlin Avenue, and Spark Lane~~

~~Location of flow paths and adjoining green links, cycleways, and required water body setbacks~~

Activity Rules if Certification has been approved

- DEV-SER-R1 (General Residential Zone) Rules
- DEV-SER-R2 (Medium Density Residential Zone) Rules
- DEV-SER-R3 (Local Centre Zone) Rules
- DEV-SER-R4 (Open Space Zone) Rules
- DEV-SER-R5 (Subdivision) Rules

Support

Generally supportive of the identification of these rules following certification.

Retain as Notified

Designations – Tautapa

Rangiora East Road Connection (WDC 47)

Designation unique identifier	WDC-47
Designation purpose	Roading purposes
Site identifier	Generally between Lineside Road and Northbrook Road, Rangiora

Support

BRL are supportive of this designation and the future Rangiora East Connection and subsequent wider Rangiora Eastern Link

Relief Sought:

Amend Appendix A Location Plan to show the up to date indicative alignment for the Rangiora Eastern Link for the portion that will be located

	141 Marsh Road (Pt Lot 1 DP 3836) 162 Boys Road (Pt RS 1436) 234 Boys Road (Lot 1 DP 22100) 259 Boys Road (Pt RS 1645) 151 Northbrook Road (Pt RS 793) 187 Northbrook Road (Lot 2 DP 9665) Parts of the unformed legal road reserve between the southern end of the formed portion of Spark Lane and Boys Road. Lapse date 20 years Designation hierarchy under section 177 of the Resource Management Act Primary Conditions Yes - see below Additional information New designation WDC-47 Notice WDC-47 Appendix A WDC-47 Appendix B WDC-47 Appendix C Part 1 WDC-47 Appendix C Part 2 WDC-47 Appendix D WDC-47 Appendix E WDC-47 Appendix F WDC-47 Appendix G WDC-47 Appendix H WDC-47 Appendix I	(ultimately connecting Lineside Road through to Coldstream Road). It should be noted that WDC 47 Appendix A 'Location Plan and Indicative Cross Sections' shows an indicative alignment for the wider Rangiora Eastern Link which is to be located within Bellgrove North. BRL is proposing a primary collector road (Road 1) in general accordance with the North-East Rangiora ODP. However, WDC 47 Appendix A plan titled 'Option P – Eastern Links (Lineside to Coldstream) Land Plan – Sheet 2' shows a different alignment to that proposed within Bellgrove and that shown on the North East Rangiora ODP. The future indicative alignment should be shown running directly adjacent to the western boundary of 52 Kippenberger Avenue (Part RS 267).	within Bellgrove North. Refer to Attachment 5 of this submission.
	 Figure 10. Snip of WDC -47 Appendix A plan titled 'Option P – Eastern Links (Lineside to Coldstream) Land Plan – Sheet 2' ●		

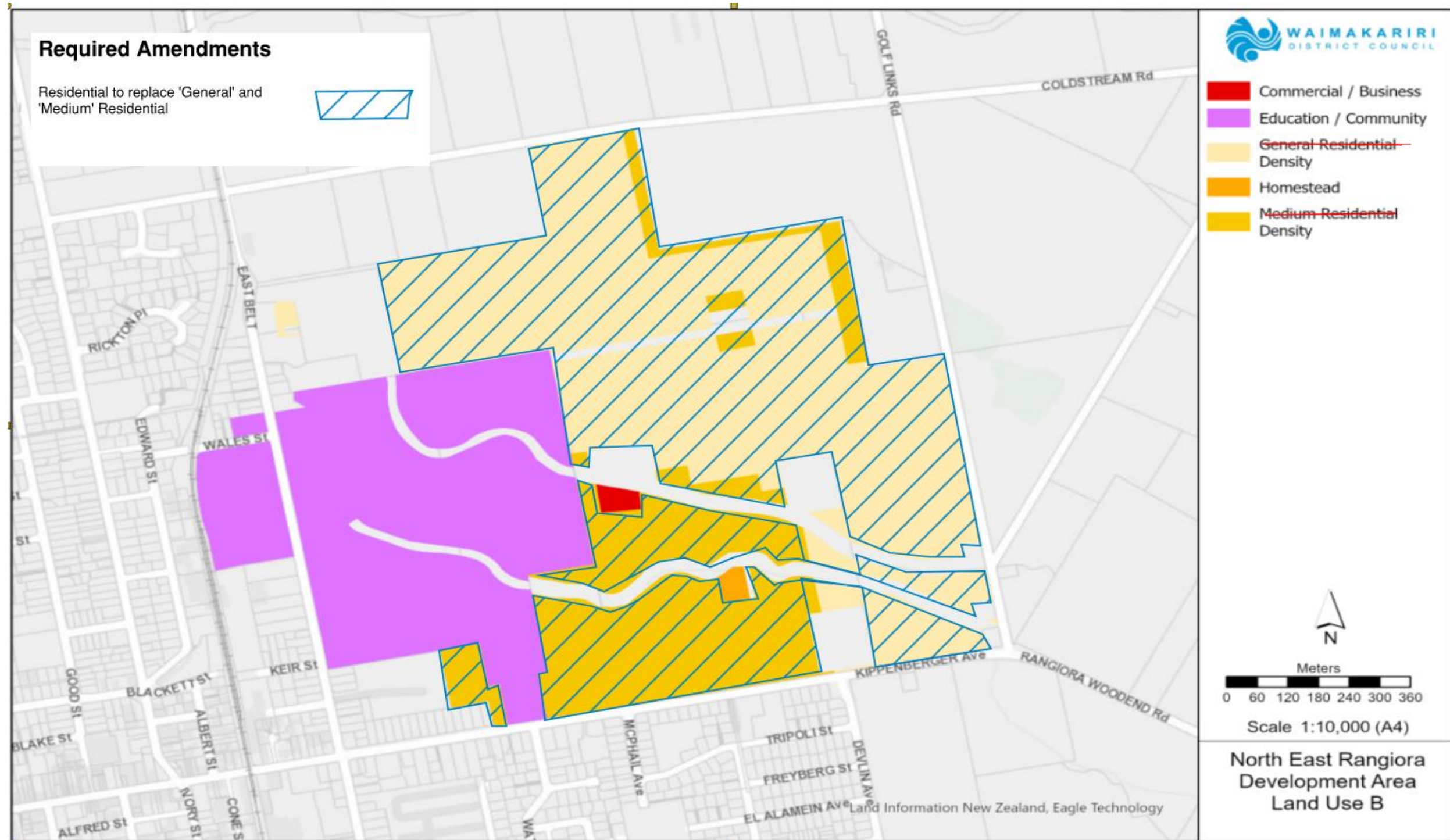
Attachment 3: Amendments Sought to the North-East Rangiora Outline Development Plans

The following Figures summarise the relief sought to the North-East Rangiora Outline Development Plans referred to in Attachment 2 above. For each of the changes identified below the relief is sought to the Option B plans. Should both Option A and B plans be retained (not BRL's preference given Option two options then the same changes should be made to the Option A plan set.

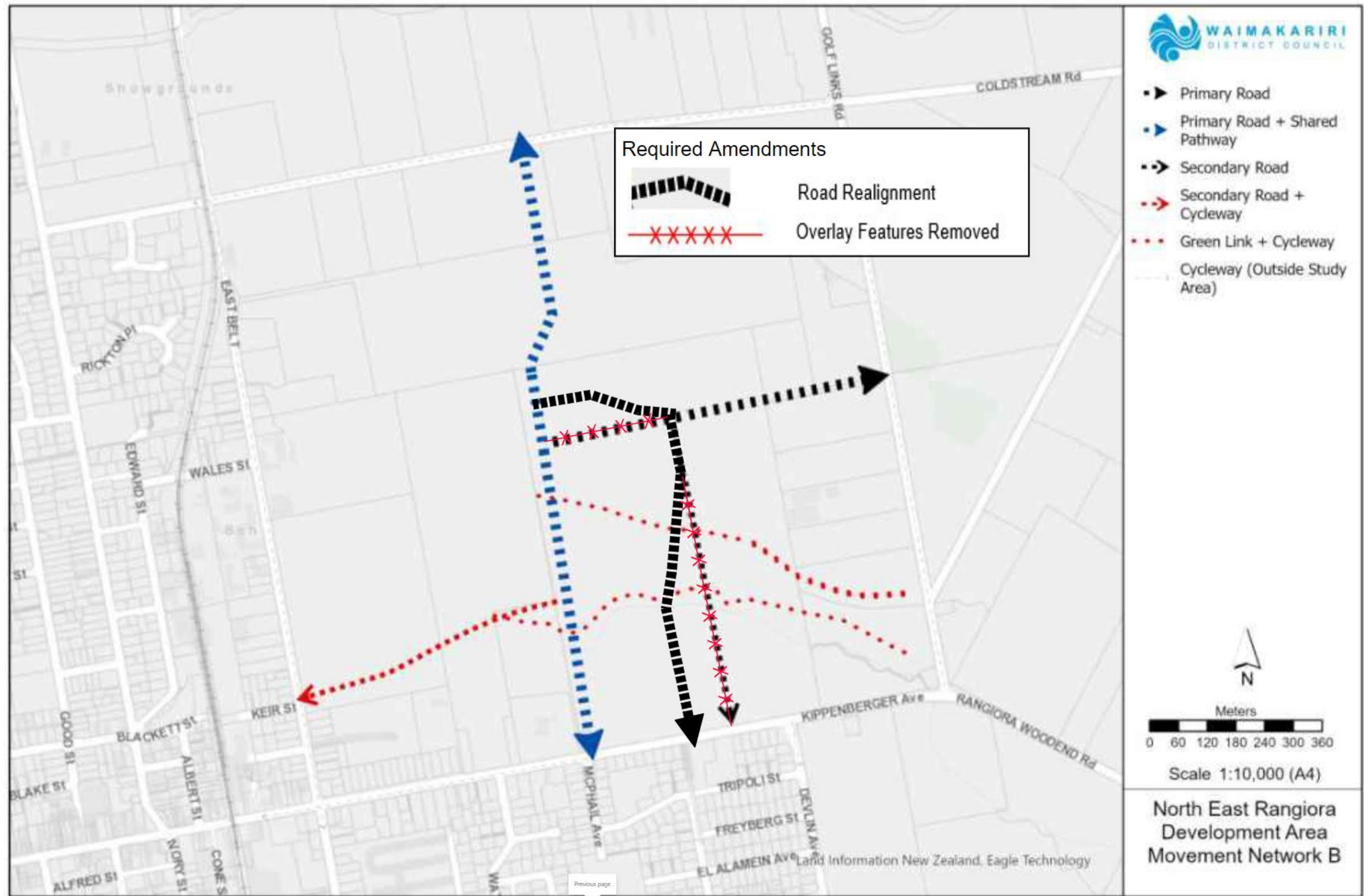
a. North-East Rangiora Development Area Plan – Relief Sought



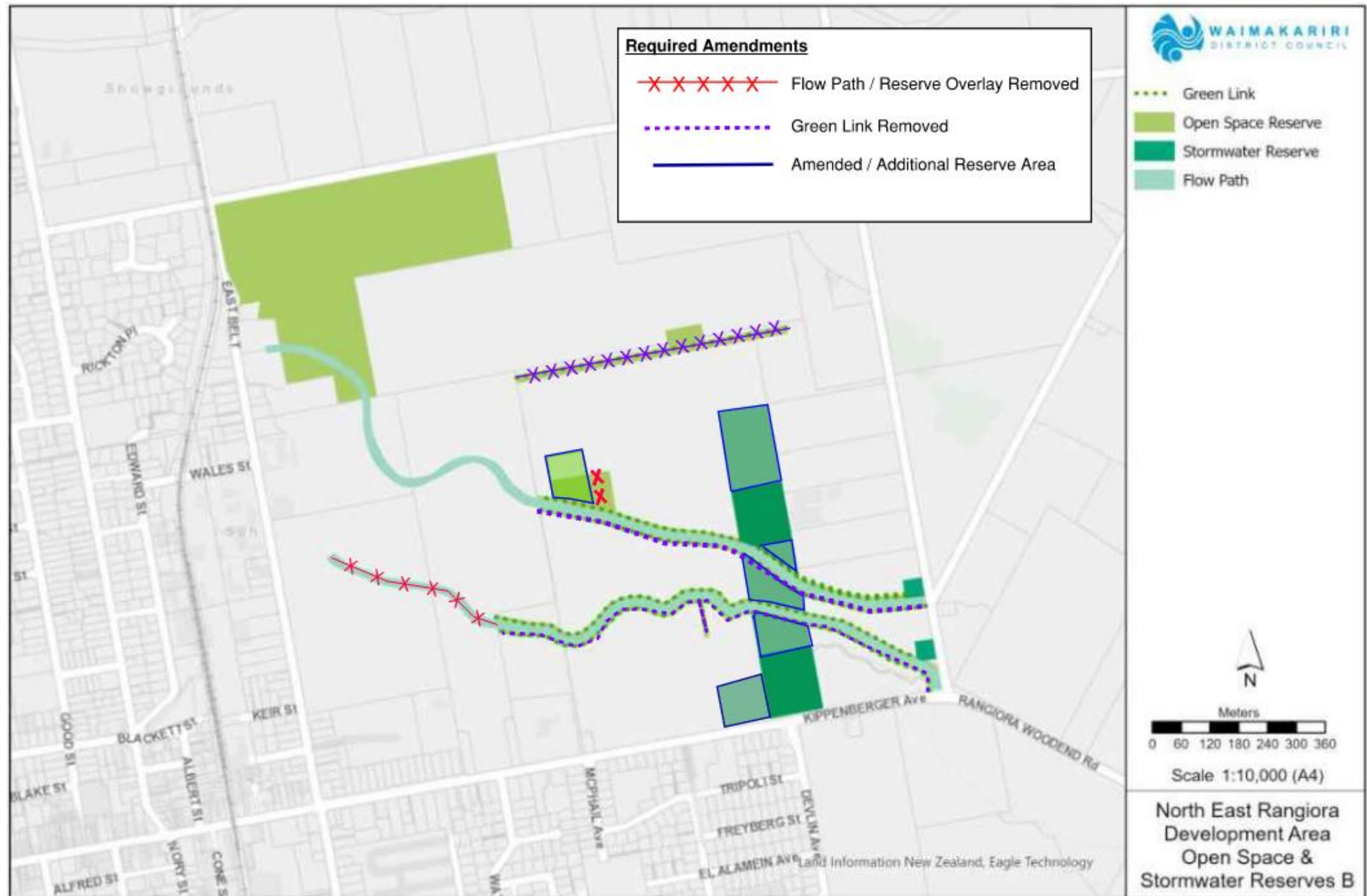
b. **North-East Rangiora Development Area – Land Use Plan – Relief Sought**



c. North-East Rangiora Development Area – Movement Network Plan – Relief Sought



d. **North-East Rangiora Development Area – Open Space and Stormwater Reserves Plan – Relief Sought**



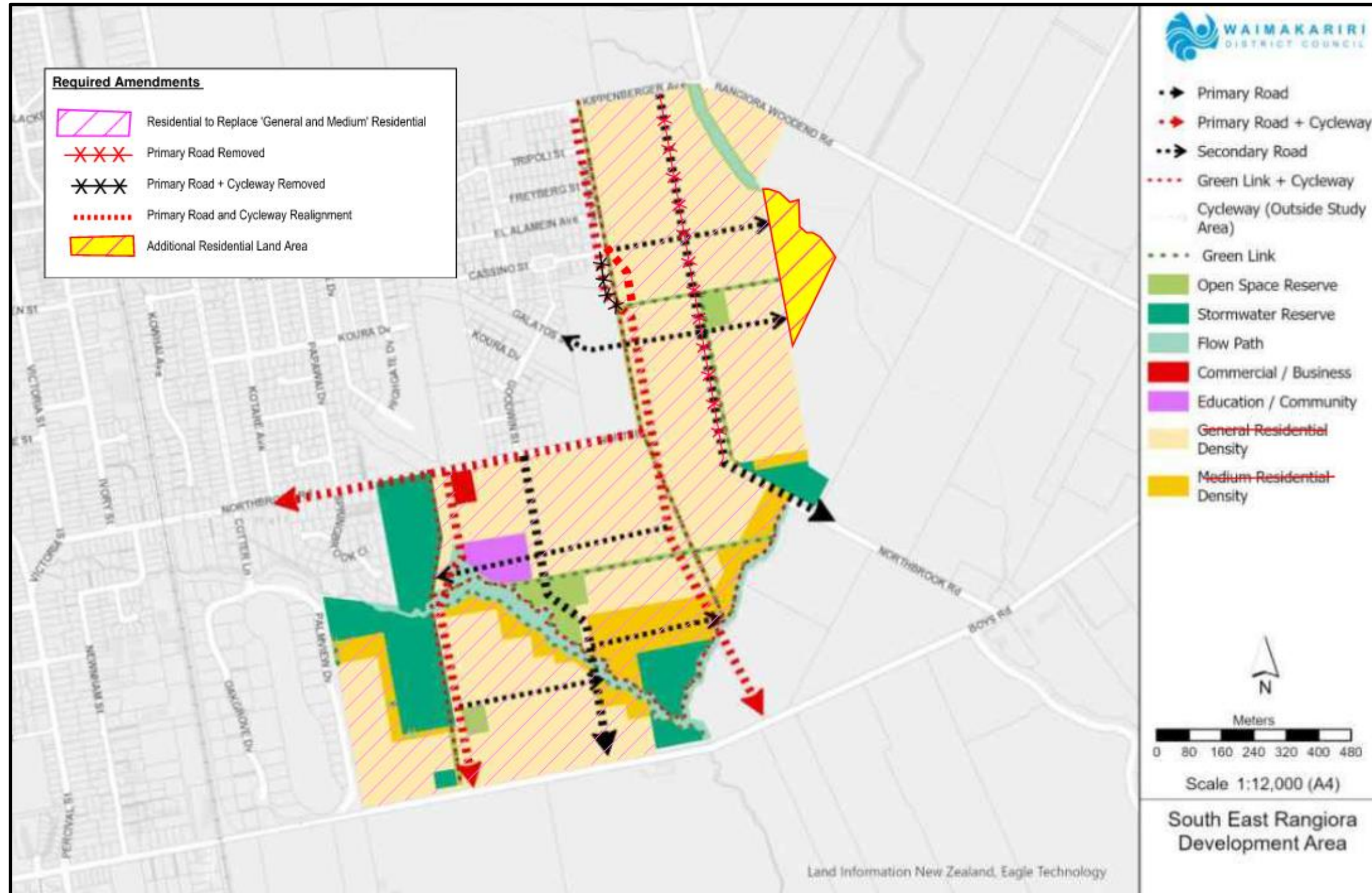
e. North-East Rangiora Development Area – Water and Wastewater Plan – Relief Sought



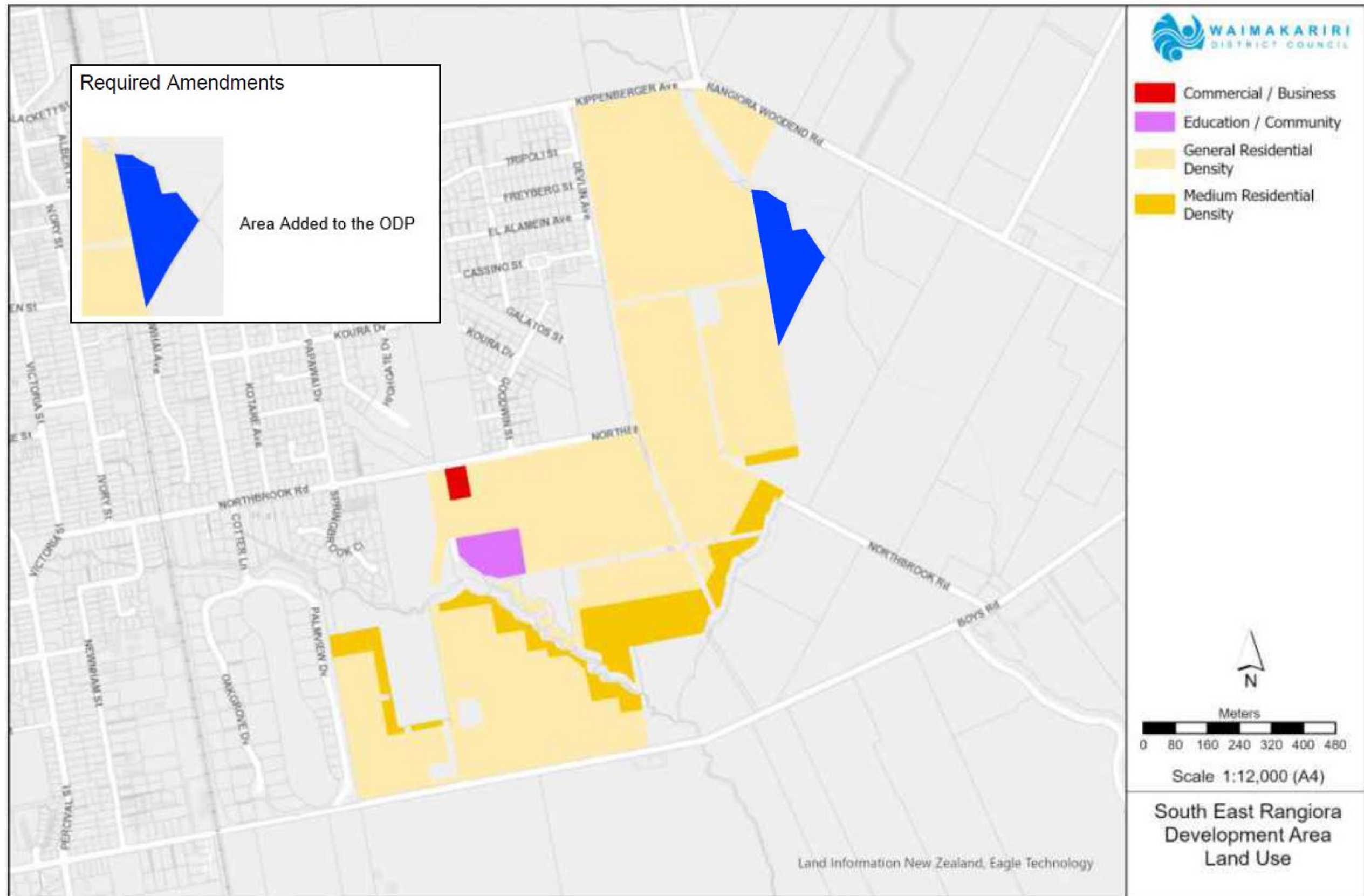
Attachment 4: Amendments Sought to the South-East Rangiora Outline Development Plans

The following Figures summarise the relief sought to the South-East Rangiora Outline Development Plans referred to in Appendix 2 above.

a. **South-East Rangiora Development Area Plan – Relief Sought**



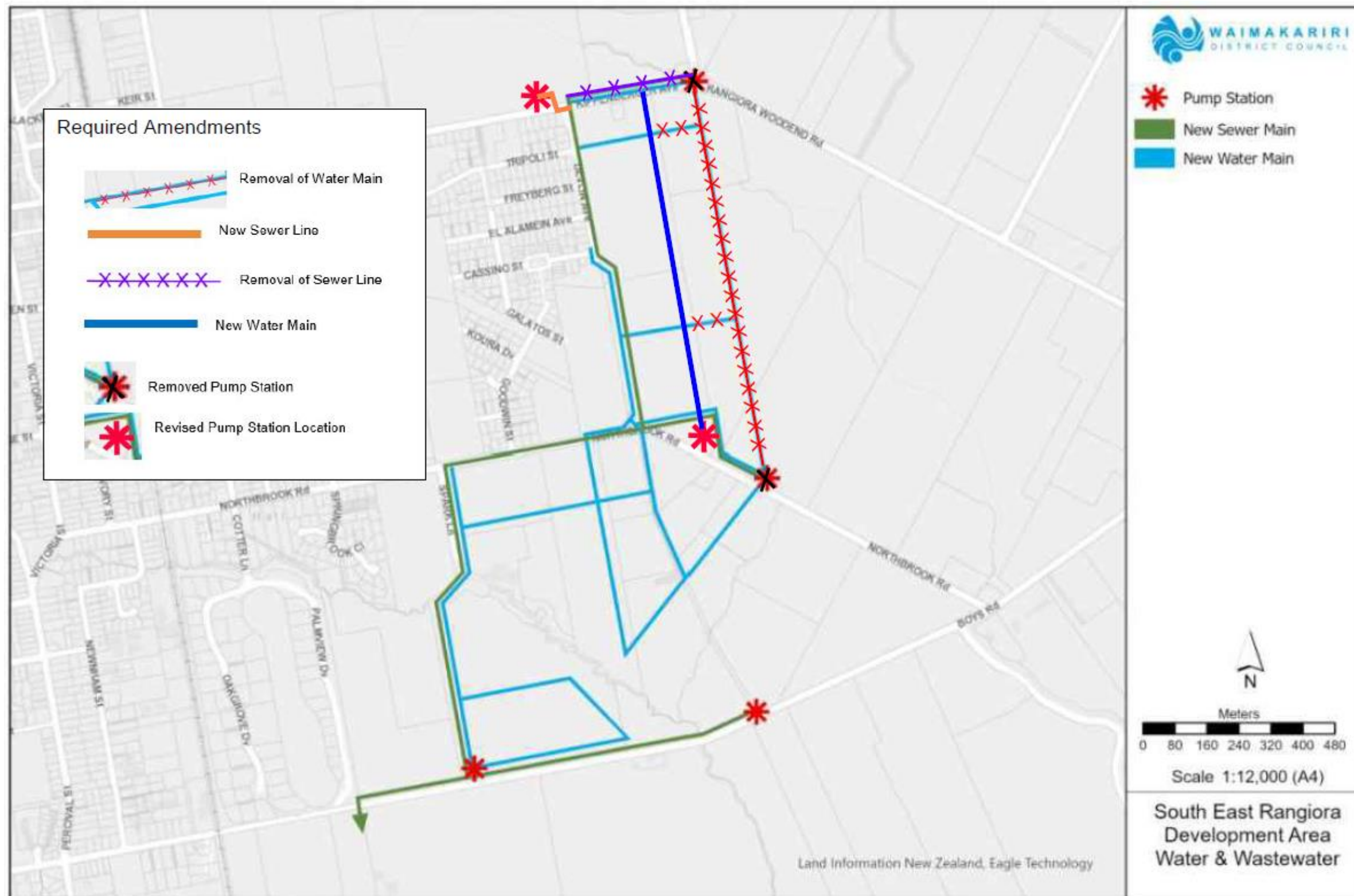
b. **South-East Rangiora Development Area – Land Use Plan – Relief Sought**



c. **South-East Rangiora Development Area – Movement Network Plan – Relief Sought**



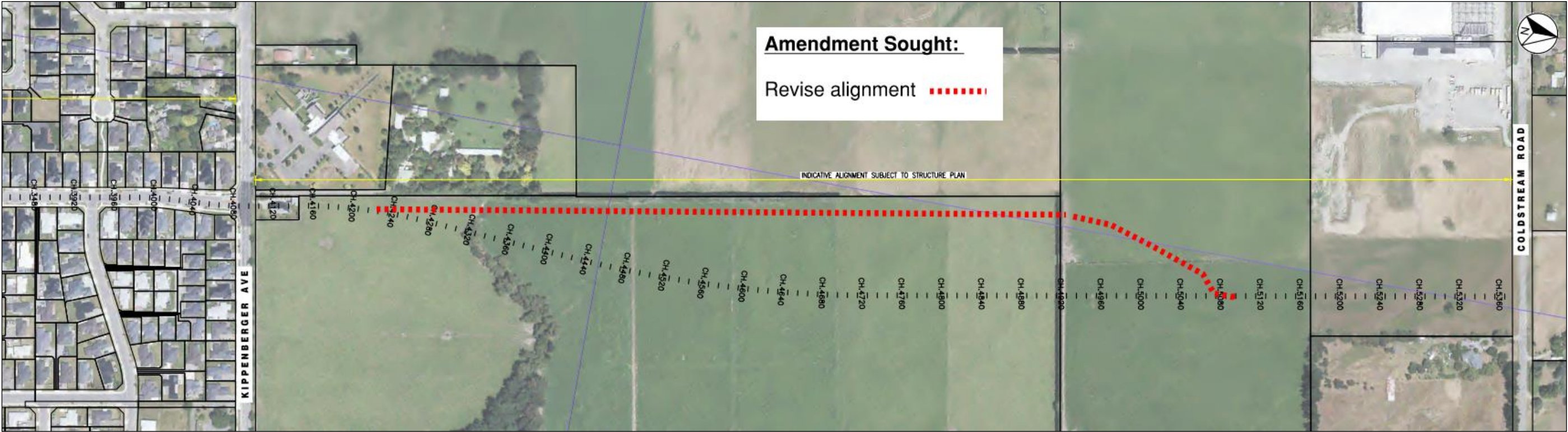
d. **South-East Rangiora Development Area – Water and Wastewater Plan – Relief Sought**



South-East Rangiora Development Area – Open Space and Stormwater Plan – Relief Sought



Attachment 5: Amendments Sought to the WDC 47 Appendix A ‘Location Plan and Indicative Cross Sections’



Attachment 6: MainPower New Zealand Confirmation of Removal of Existing Line



MainPower New Zealand Limited
172 Fernside Road, RD 1, Kalapoi 7691
PO Box 346, Rangiora 7440
T. +64 3 311 8300 F. +64 3 311 8301

24th November 2021

BELLGROVE
Rangiora Ltd

ATTN: Jason Trist

Dear Jason,

Re: Bellgrove subdivision

MainPower confirms that the electrical reticulation required for the Bellgrove development can be supplied as per concept plans provided.

The existing 33,000 high voltage line that currently runs through the development will be decommissioned and removed as part of this project.

Please do not hesitate to contact me if you have any questions.

Yours faithfully

A handwritten signature in black ink, appearing to read "Mark Appleman". The signature is stylized with a large, looped initial "M" and a series of connected, wavy lines for the rest of the name.

Mark Appleman
Network General Manager

If you have any concerns about MainPower's services please call our Regulatory Manager on 0800 835 567 to access our free, Complaint Resolution Service. If we are unable to resolve your concern you can contact the free, independent Utilities Disputes Ltd on 0800 22 33 40 or visit www.utilitiesdisputes.co.nz

www.mainpower.co.nz