



Waimakariri District Council
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Phone 0800 955 468

DISTRICT PLAN REVIEW

Proposed Waimakariri District Plan - Submission

Clause 6 of Schedule 1, Resource Management Act 1991

Submitter details

(Our preferred methods of corresponding with you are by email and phone)

Full name:

[Redacted] Godwin

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Please select one of the two options below:

- ☒ **I could not** gain an advantage in trade competition through this submission (go to Submission details, you do not need to complete the rest of this section)
- ☐ **I could** gain an advantage in trade competition through this submission (please complete the rest of this section before continuing to Submission details)

Please select one of the two options below:

- ☒ **I am** directly affected by an effect of the subject matter of the submission that:

- A) Adversely affects the environment; and
B) Does not relate to trade competition or the effect of trade competition.

- ☐ **I am not** directly affected by an effect of the subject matter of the submission that:

- A) Adversely affects the environment; and
B) Does not relate to trade competition or the effect of trade competition.



Submission details

The specific provisions of the proposal that my submission relates to are as follows: (please give details)

Oppose Zoning of 18 Sillano Pl as Rural lifestyle zone
Oppose Zoning of Sanderson Subdivision as Rural lifestyle zone
Oppose Application of Planning Maps, Rules, objectives and Policies
for the above R.L.Z

Submission is that 18 Sillano Place (and Sanderson Subdivision) be rezoned
Large lot residential zone LLRZ with urban flood hazard overlay, Same as
rest of Mandeville on planning maps

My submission is that: (state in summary the Proposed Plan chapter subject and provision of your submission. Clearly indicate whether you support or oppose the specific provisions or wish to have amendments made, giving reasons) (please include additional pages as necessary)

See attached Submission Document.

I/we have included: 72 additional pages

I/we seek the following decision from the Waimakariri District Council: (give precise details, use additional pages if required)

Council to change Proposed Planning Maps to rezone
18 Sillano Pl from Rural lifestyle zone to Residential
large lot zone with associated urban flood Assessment
overlay
Further consequential amendments to D. Plan to Support
Subdivision, use and development as attached.

Submission at the Hearing

☐ I/we wish to speak in support of my/our submission

☒ I/we do not wish to speak in support of my/our submission

☒ If others make a similar further submission, I/we will consider presenting a joint case with them at the hearing

Important Information

1. The Council must receive this submission before the closing date and time for submissions.
2. Please note that submissions are public. Your name and submission will be included in papers that are available to the media and public. Your submission will only be used for the purpose of the District Plan review process.
3. Only those submitters who indicate they wish to speak at the hearing will be emailed a copy of the planning officers report (please ensure you include an email address on this submission form).

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- It is frivolous or vexatious
- It discloses no reasonable or relevant case
- It would be an abuse of the hearing process to allow the submission (or the part) to be taken further
- It contains offensive language
- It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Send your submission to: Proposed District Plan Submission
Waimakariri District Council
Private Bag 1005, Rangiora 7440

Email to: developmentplanning@wmk.govt.nz

Phone: 0800 965 468 (0800WMKGOV)

You can also deliver this submission form to one our service centres:

Rangiora Service Centre: 215 High Street, Rangiora

Kaiapoi Service Centre: Ruataniwha Kaiapoi Civic Centre, 176 Williams Street, Kaiapoi

Oxford Service Centre: 34 Main Street, Oxford

Submissions close 5pm, Friday 26 November 2021

Please refer to the Council website waimakariri.govt.nz for further updates

Waimakariri District Council

District Plan Review Committee

developmentplanning@wmk.govt.nz

21 November 2021

Submission: *K & R Forswin - 18 Siliano Pl; Mandeville NTL, R2, Kangaroo*

1. Specific provisions that my submission relates to:

- Oppose Rural Lifestyle Zone and Non-Urban Flood Assessment Overlay being applied to 69 Velino Place, Mandeville.
- Oppose the Rural Lifestyle Zone being applied to the rest of San Dona subdivision in Mandeville (consisting of Vicenza Drive, Biella Place, Pesaro Lane, Velino Place, Siena Place, Silano Place, Modena Place and Verona Place.)
- Oppose Rural Lifestyle Planning Maps, Rural Lifestyle Rules, Objectives Policies and Rules as being applied to our property and surrounding San Dona neighbourhood.
- Request that *18 Siliano Pl.* (and San Dona subdivision) be rezoned Large Lot Residential Zone the same as the rest of Mandeville.
- Request that Urban Flood Hazard Assessment Overlay apply to the area.
- Consequential District Plan amendments as set out to support subdivision, use and development.

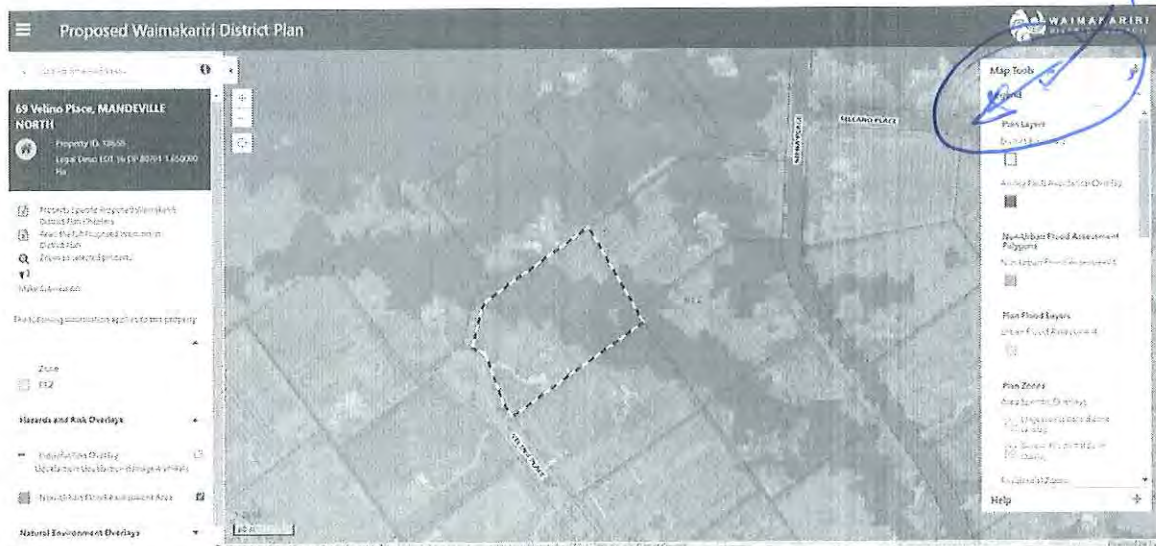


Figure 1: Proposed Zoning of 69 Velino Place: Rural Lifestyle Zone with Non-Urban Flood Assessment Overlay

2. Reasons for the submission:

2A. The San Dona situation;

In the Proposed District Plan, Rural Lifestyle Zone requires a minimum area of 4ha for rural activities to be permitted in the zone, including in relation to residential density and subdivision. No property in the San Dona development meets the minimum area requirement of 4ha. All allotments have an area between 1.2 Ha (1 Wards Road) to 2.18Ha (1 Verona Pl)¹. The proposal to zone the land in San Dona Rural Lifestyle zone is equivalent to the status quo for San Dona in relation to the Operative District Plan where the current "Rural" zone 4ha minimum applies to this area.

The Proposed Waimakariri District Plan does not propose any bespoke rural zone provisions to address this existing situation. Having a greater range of minimum residential unit densities applying within different parts of the District (additional rural zonings) were considered as Option D according to the Council's Rural s.32 assessment. This option was discounted in the Rural S.32 Evaluation assessment in favour of two rural zones for the District only; being 4ha Rural Lifestyle Zone and 20ha General Rural Zone. Key drivers considered for Efficiency and Effectiveness when considering Option D included the character report by Boffa Miskell, related to whether the development in the rural zone reflected more of a rural character or a rural lifestyle character. The other key factor for areas related to rural production options, noting that those properties less than 10ha did not provide flexibility in rural production potential.² Further with respect to rural character, finer grained differentiation was not considered to be needed. Thus, *"establishing different densities based on different character areas would have increased complexity of the Rural provisions without consequential environmental, economic, social or cultural benefits being realised. As such this would not have been an effective approach."*³

To this extent, and in lieu of there being no other bespoke alternative proposed for the San Dona situation, we support two rural zones as proposed for the Waimakariri District.

However, in relation to San Dona the fundamental issue is not one of rural character but that the primary use of land is not 'rural' but is lifestyle living commonly referred to as "rural-residential". This type of housing provides housing choice for residents who do not wish to live in a residential area, while also not wishing to maintain a rural productive block of 4ha or more.

San Dona was created in 2000-2004 under the Transitional District Plan (prior to the current Operative District Plan) on the basis that olive grove horticulture would be an economically productive use of land (under Economic Use provisions that applied at the time) which purportedly only required 1.2-1.8ha of land, however, the reality is not the case. The covenants that protected the retention of olive trees to ensure the Rural Productive Use would continue for ten years following the subdivision, have now lapsed and many olive trees have been removed from throughout the San Dona neighbourhood. While some olive trees remain, such as on our property, there is no ability to obtain a viable commercial/productive or economic use from them. Not only are a large proportion of the olive trees an unsuitable variety, one of the more recent challenges is that there is no longer an olive press available within the subdivision for the community to use, leaving land owners to have to pay for commercial pressing at other offsite locations. From our experience, the cost of pressing olives, harvesting them and maintaining the trees far exceeds any potential return, so we have not pressed

¹ Only 1 Verona Place exceeds 2ha, of approximately 104 allotments in San Dona (from Canterbury Maps information).

² Pages 81 and 82 of the Section 32 Report Whaitua Taiwhenua/Rural

³ Page 83 of the Section 32 Report Whaitua Taiwhenua/Rural

any oil in the last 2 years. Prior to this we pressed whatever we could pick in weekends in an effort not to waste them. The amount of oil produced was only sufficient to share with family and friends. From our point of view, it cannot continue to be stated that the San Dona Mandeville development is a 'rural production activity' based on its 2000-2004 origins for olive oil production because it simply isn't the case nearly twenty years on.

2B. The Mandeville situation;

The rest of Mandeville, in Wards Road, Dawsons Road, Truro Close, Roscrea Place, Ohoka Meadows and along Tram Road was developed after the San Dona development, from 2005-2019 under the Operative District Plan. It was not created on the basis of any 'economic use provisions' which by then had been removed in the Operative District Plan which became operative in 2005. These rural-residential neighbourhoods surrounding San Dona, were created as 'Residential 4A and 4B' zones to allow residential density of one house per 5,000m² or 1ha, very similar, but smaller in size to the San Dona development that had come first.

While this growth of Mandeville has seemingly been ad hoc and led by successive private plan changes, each has been part of a notified RMA plan change process, with consideration given to density and the appropriateness of a lesser residential density than San Dona in the immediate neighbourhood. Further, the removal of the "Economic Use" provisions from the Transitional District Plan as it transitioned into the current Operative District Plan would also have been an intentional RMA (publicly involved) decision made at the time for both the environment and community.

Ultimately this has led to an inevitable change in what was a 'rural character' to an accepted 'rural - residential character' as Mandeville has grown to become a place that people want to live, can make use of the Mandeville Sports Ground to 'play' and has even led to Council undertaking a Plan Change to rezone land to provide a Commercial area for the growing community. Council has therefore already acknowledged the existing growth of Mandeville by enabling and providing a place that also allows 'work' for the community. This "live, work and play" mantra is good for the community, supports it and creates a sense of place and belonging while also supporting residents, adding to the village feel of Mandeville as a whole.

In more recent times, there have been concerns with the sprawling growth of Mandeville via the private plan change process, not least in the challenges that arise with an increase in population. These primarily relate to scale and character of development on the environment and people, infrastructural capacity and associated traffic, with there eventually being a Plan Change decision in 2013 that put a ring around the Residential 4A, 4B and San Dona extent of Mandeville to prevent further growth and private plan changes ⁴ as shown in Figure 2 below.

⁴ Map 167 Mandeville North Growth Boundary in the Operative District Plan which includes the most recent plan changes and San Dona, and reference to Policy 18.1.3.1 of the Operative District Plan.

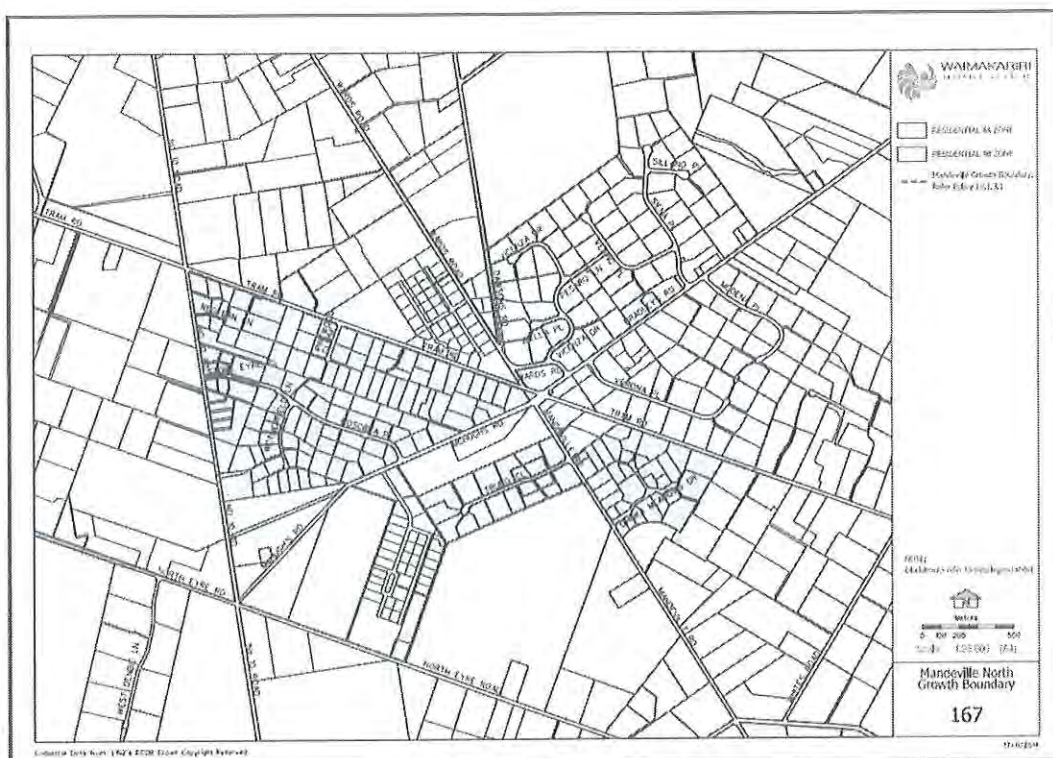


Figure 2: Mandeville North Growth Boundary including San Dona area: Source Operative Waimakariri District Plan.

However, a recent Council decision to leave Mandeville (in its entirety) out of the Waimakariri Rural Residential Strategy (2019) as a “Special Circumstance” or effectively in the ‘too hard basket’, left many residents with ill feeling towards Council, given changes that had been made prior to that time to provide additional stormwater services in Mandeville, works to address the flooding resurgence that affects all of Mandeville, San Dona wastewater had been upgraded to be connected into the Council Eastern District Wastewater Scheme and the provision of other Council services such as recycling and rubbish collection (albeit on a voluntary basis) had been provided. As these changes have occurred, San Dona residents have contributed to their cost, either through increased rates or a one-off payment (particularly in relation to wastewater contribution works) to have the same level of Council services as the rest of Mandeville despite not being in a Residential 4A or 4B zone.

3. Submission Request: Rezoning for San Dona and 69 Velino Place to Large Lot Residential Zone;

3A. Statutory Framework

The Proposed Waimakariri District Plan Review presents a new opportunity that enables Council to consider and give effect to the requirements of the recent National Policy Statement for Urban Development (2020) which requires the Council, as part of “Tier 1 Christchurch District” to consider Waimakariri District’s contribution to residential housing capacity in Greater Christchurch.

Under this new framework, the Council has determined that Residential 4A and 4B zones are more akin to ‘residential land use’ rather than rural; have weighed up various reports and investigations prepared for the District Plan Review⁵, including the Draft National Policy Statement for Highly

⁵ Background Reports to the Proposed District Plan for the consideration of the Rural provisions and Section 32 proposal:

- Housing Demand and Need in Waimakariri District – Research Report (2020)
- Rural Character Assessment (2018)
- Analysis of Drivers and Barriers to Land Use Change (2017)

Productive Rural Land, to determine what land area is now required to be protected for productive rural land uses in the District and what land is to be set aside for residential use. Given these considerations, without proposing any new rezoning as part of the Proposed District Plan, Council has:

- Adopted existing Residential 4A and 4B zones developed under the Operative District Plan to be *Residential Large Lot Zone*, thus giving some development potential to certain parts of Mandeville (such as Truro Close, Ohoka Meadows, Tram Road and Roscrea Place) regardless of any “special circumstances” that previously excluded Mandeville from further consideration under the recent Waimakariri Rural Residential Strategy 2019;
- Has recommended a *Residential Large Lot Overlay* (in conjunction with rural zoning) for any land identified in the Waimakariri Rural Residential Strategy 2019 for potential ‘Rural Residential’ development to be rezoned by a private plan change at a later date;
- Has adopted a ‘*status quo*’ approach zoning for San Dona (and all other existing rural zones in the eastern part of District) to *Rural Lifestyle Zone (4Ha)* regardless of actual allotment size, infrastructure and servicing or rates contributions/levels of service already provided by Council. That is, taking no account of San Dona’s 1.2-1.8ha similarity in general density and service provision with the rest of Mandeville.
- Has removed (or not included) Map 167 North Mandeville Growth Boundary from the Proposed District Plan that restricted the ‘extent of Mandeville’ thus allowing an opportunity for San Dona residents (and others) to seek a more appropriate zoning as part of the District Plan Review,
- Has determined that productive rural land is to be protected, particularly in the western part of the District by creating a General Rural Zone (20ha) minimum allotment size and making such rules effective immediately.

Given the above and that San Dona allotments that are 1.2-1.8ha size are effectively no different to others in the Residential 4A/4B zones of Mandeville, is an original development as part of the Mandeville Community, it is submitted that San Dona should also be considered part of the Mandeville Village by being recognised as part of the *Residential Large Lot Zone*. The existing size of the majority of San Dona allotments are much closer in area to 5,000m² than to the Rural Lifestyle Zone 4ha minimum.

The context of San Dona, the Proposed Rural Lifestyle Zone and Large Lot Residential zoning, along with the Non-Urban and Urban Flood Assessment Overlays (shown in two shades of blue) applied to the rest of Mandeville are shown in Figure 3 below:

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- Rural Subdivision and Housing Analysis (2018)
 - Rural Futures Analysis: Future Agri-Food Scenario Planning for a Prosperous District (2018)
 - Rural Production Advice – Rural Land Zoning (2018)

development of San Dona as infill development occurs subject to specific infrastructure, subdivision and natural hazard provisions.

Specific provisions are generally *supported* with a small number of provisions *opposed* on the basis of providing better clarification for the ongoing use and interpretation.

While the Proposed Transportation provisions have not been specifically assessed, we consider that these are matters of specific detail that would apply at the time of a detailed subdivision application as required for any Large Lot Residential zone land use or subdivision development dependant on the road network location of the relevant site. We consider that technical reports for proposed traffic effects can be provided at that time (if relevant).

In relation to the Urban and Non-Urban Flood Assessment overlays (as they are separately proposed to apply to residential and rural areas respectively), it can be seen from Figure 3 above that Council has an existing flood model that applies to the whole District. A rezoning from Rural Lifestyle Zone to Large Lot Residential Zone would also require a change from Non-Urban Flood Assessment Zone to Urban Flood Assessment Zone as shown above. It appears this information is already available and simply requires a change to colour of the flood overlay in the GIS E-Plan shown above. A similar colour change can be made to recognise the new zone.

3C. Future Development and Infrastructure as a result of rezoning to Large Lot Residential Zone

There would be some limited development potential within San Dona with a change to the Residential Large Lot zone and a one house per 5,000m² density, allowing 2 houses (3 in some cases) within each existing allotment, subject to a full and comprehensive subdivision application that meets the proposed requirements of the Proposed District Plan. Any further development (additional housing or subdivision) would be required to demonstrate servicing capacity and/or upgrades, flood hazard mitigation, site layout and setbacks, built form and traffic effects in the usual way, while paying Development Contributions for connection to Council services and upgrades as required.

In regard to infrastructure, Council's projected property growth expectations, as stated in Table 11 of the Ohoka Rural Drainage Scheme Activity Management Plan 2021 for the next 30 years are 600 additional properties in the Ohoka Drainage Scheme, which includes the San Dona area. Council have planned expenditure for capital works that appear to be aligned with resolving existing flooding/capacity issues by installing improved drainage works in Wetherfield Lane and McHugh's Road, in conjunction with a groundwater resurgent diversion down No 10 Road to the old Eyre riverbed. This will have a positive impact to help mitigate perceived issues with soakage ability for stormwater and conveyance issues for downstream capacity in Mandeville (including San Dona).

The general policy of ensuring post-development flows do not exceed pre-development flows at the time of further development and subdivision are a critical factor in managing stormwater effects and are able to be appropriately considered at the time of specific subdivision consent for any site.

It is disappointing to read the Post 2014 Flooding Memo to the Flood Team PCG dated 6 August 2014, (which is attached as part of the Activity Management Plan 2021 for the Ohoka Rural Drainage Scheme) which states the drains and culverts along two critical drainage paths through San Dona development did not have capacity to accommodate design flows for more recent upstream developments between San Dona and No 10 Road, calculated from design storm events. This means that Council has enabled residential development in the West of Mandeville over time (after San Dona was built) which have not managed their pre and post development resultant stormwater flows, thus allowing an increase in stormwater flow through undersized San Dona infrastructure without

mitigation. The adverse effect of this has led to the need for Council following the 2014 flood event, to upgrade the Bradleys Road and Siena Place infrastructure through San Dona, while increasing the stormwater drainage area subsequently required to pay rates for this (including in San Dona). Along the way, the general perception has become that San Dona 'floods' or has problems, which in reality have occurred due to subsequent upstream development through no fault of San Dona itself. The ability to further develop San Dona allotments for infill housing, will still require San Dona to continue to contribute pre and post development mitigation given this existing issue. It is common elsewhere to require attenuation of stormwater flows and therefore suitable engineering solutions can be found at the time of resource consent to continue mitigating or avoiding further downstream effects.

The Activity Management Plan 2021 Mandeville/Fernside Water Supply Scheme document projects 15 new connections per year. This will be adequately catered for by the planned 500m³ new reservoir that is planned to replace the existing water storage system at Two Chain Road. Additional head work pump upgrades planned for the next 10 years will provide capacity for the next 50 years of growth for the scheme. It is considered there is sufficient water supply to enable further restricted onsite storage of potable and firefighting water as per the current reticulated Council supply in San Dona.

In regard to wastewater, the 2014 flood event highlighted the need for private drainage systems to be upgraded to be secure from ground water ingress. At the time, San Dona was connected to its own Private Community wastewater system and the upgrades and sealing works necessary were undertaken by all land owners and Council. We installed sealed turret risers on our tank. Subsequently, the San Dona development was reticulated to the Council's Eastern Districts Wastewater Scheme on the basis that this work had been undertaken for the full development.

Growth projected for the scheme is only 8 new connections per year according to the Council's Activity Management Plan 2021 Mandeville Wastewater scheme. Additional use and development within San Dona will require new STEP wastewater systems to be provided and possible low-pressure wastewater connections. The details of this will be specific at the time of development and are likely to be able to also be reticulated to the upgraded (post 2014) system.

3D. Other Considerations

In relation to positive effects that are not already addressed elsewhere, the development potential that would occur with rezoning San Dona to a Large Lot Residential Zone would lift the rating base for Waimakariri District, enabling the Council to contribute rating money towards the Mandeville Sports Reserve, libraries and other Council community facilities that benefit the community.

There are also likely to be positive effects for Swannanoa and Ohoka primary schools whose catchments both include the full Mandeville community (including San Dona).

4. Conclusion

We seek the following decision from the Waimakariri District Council:

- A. That Waimakariri District Council accept the submission and rezone San Dona as Residential Large Lot Zone with an Urban Flood Assessment Overlay so that there is consistent application of District Plan provisions across the existing township of Mandeville North.
- B. Change the Planning Maps for the zone and Urban Flood Assessment Overlay.
- C. Consequential changes to the specific provisions as proposed in Appendix A: Waimakariri Proposed District Plan Assessment


Kerri Gosselin - 18 Siena Place 0274803941

**Appendix A: Assessment of Proposed Waimakariri District Plan Objectives,
Policies, Rules and Standards for Large Lot Residential Zone.**

A re-zoning of San Dona to Large Lot Residential Zone (LLRZ) will be consistent with Waimakariri Proposed District Plan Objectives and Policies and Rules, which are assessed below:

Strategic Directions Objectives		
SD- 01 – Natural Environment	San Dona Assessment (LLRZ)	Submission point
Across the District: 1. There is an overall net gain in the quality and quantity of indigenous ecosystems and habitat, and indigenous biodiversity; 2. The natural character of the coastal environment, freshwater bodies and wetlands is preserved or enhanced, or restored where degradation has occurred; 3. Outstanding natural features and outstanding natural landscapes are identified and their values recognised and protected; 4. People have access to a network of natural areas for open space and recreation, conservation and education, including within riparian areas, the coastal environment, the western ranges, and within urban environments; and 5. Land and water resources are managed through an integrated approach which recognises the importance of ki uta ki tai to Ngāi Tahu and the wider community, and the inter-relationships between ecosystems, natural processes and with freshwater.	The San Dona area does not have indigenous habitat or biodiversity areas. Does not contribute natural character or coastal environment, is not an outstanding natural feature or landscape. Does not have riparian areas. Land and water resources can continue to be managed, as they have been improved with reticulation to Council led 3-water services over time. Land drainage systems through the development exist which enable some ecosystem, natural processes and drainage of freshwater. These can continue to be maintained and enhanced. The existing development (and further development) can be consistent with the objective.	No proposed change requested to Objective SD-01. Support Objective SD-01.
SD-02 Urban Development	San Dona Assessment (LLRZ)	Submission point
Urban development and infrastructure that: 1. Is consolidated and integrated with the urban environment;	The majority of Mandeville has now been identified as an urban area. The rezoning of San Dona from Rural to LLRZ will:	General Support of Objective SD-02. However, change requested to Subclause 9 to allow for suitable large lot residential areas to be considered. "Identification" not to be limited to

2. that recognises existing character, amenity values, and is attractive and functional to residents, businesses and visitors; 3. utilises the District Council's reticulated wastewater system, and potable water supply and stormwater infrastructure where available; 4. provides a range of housing opportunities, focusing new residential activity within existing towns, and identified development areas in Rangiora and Kaiapoi, in order to achieve the housing bottom lines in UFD-O1; 5. supports a hierarchy of urban centres, with the District's main centres in Rangiora, Kaiapoi, Oxford and Woodend being: a. the primary centres for community facilities; b. the primary focus for retail, office and other commercial activity; and c. the focus around which residential development and intensification can occur. 6. provides opportunities for business activities to establish and prosper within a network of business and industrial areas zoned appropriate to their type and scale of activity and which support district self-sufficiency; 7. provides people with access to a network of spaces within urban environments for open space and recreation;	1. Further consolidate and integrate the San Dona area with the rest of Mandeville as directed by the objective. 2. Recognise the existing character and amenity of San Dona whilst enabling a consistent Mandeville density which remains attractive and manageable for residents. No overall change in character or amenity anticipated. 3. Further contribute to Council 3-waters services given the San Dona development is now fully serviced by Council already, 4. Continue to provide housing opportunity, (rural-residential choice) and allow additional residential (RLL) density in the existing village bounds of Mandeville 5. Continues to support the hierarchy of Oxford, Kaiapoi and Rangiora as the main centres of the District (and closest to Mandeville). Noting the intensification proposed for San Dona is the same as that already existing in Mandeville (RLL only). 6. Provides additional properties for both continuing and additional support to the Mandeville business area, thus assisting further with its self sufficiency, 7. Increases the potential community use for Mandeville Sports Clubs and recreation facilities in the community. 8. Does not impact the Special Purpose Zone (Kāinga Nohoanga) 9. Provides opportunity for Large Lot Residential development within an existing area and provides additional support to	Waimakariri Rural Residential Strategy, given it does not include Mandeville at all. Otherwise Proposed 4A/4B RLL zone in Mandeville proposed by Council is already inconsistent with this objective. <u>Propose change</u> to subclause 9 as follows: 9. provides ~~limited~~ opportunities for Large Lot Residential development in ~~identified~~ areas, subject to adequate infrastructure;
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8. supports the transition of the Special Purpose Zone (Kāinga Nohoanga) to a unique mixture of urban and rural activities reflecting the aspirations of Te Ngāi Tūāhuriri Rūnanga; 9. provides limited opportunities for Large Lot Residential development in identified areas, subject to adequate infrastructure; and 10. recognise and support Ngāi Tūāhuriri cultural values through the protection of sites and areas of significance to Māori identified in SASM-SCHED1.	develop infrastructure and upgrades as necessary. 10. Does not impact Ngāi Tūāhuriri cultural values as the area is not an identified site or area of significance to Maori. The proposed zoning (LLRZ) of San Dona is highly consistent with the Strategic Objective that applies to any new or intensified urban development.	
SD – 03 Energy and Infrastructure	San Dona Assessment (LLRZ)	Submission point
Across the District: 1. improved accessibility and multi-modal connectivity is provided through a safe and efficient transport network that is able to respond to technology changes and contributes to the well-being and liveability of people and communities; 2. infrastructure, including strategic infrastructure, critical infrastructure and regionally significant infrastructure: a. is able to operate efficiently and effectively; and b. is enabled, while: i. managing adverse effects on the surrounding environment, having regard to the social, cultural and economic benefit, functional need and operational need of the infrastructure; and	The majority of Mandeville has now been identified as an urban area. The rezoning of San Dona from Rural to LLRZ will: 1. Accessibility and connectivity remains unchanged from the status quo. 2. a. infrastructure in Mandeville has already been contributed by existing San Dona residents (SW, WW and water services) and further connections and contributions to it can assist with further enabling efficient and effective operation by Council through rates and Development Contributions for the benefit of all of Mandeville. b. Surrounding environmental effects have already been managed with the reticulation of San Dona services that were not previously available (SW), or relied on a small scale (developer led) infrastructure (WW) that are now managed by Council. Further	No proposed change requested to Objective SD-03. Support Objective SD-03.

ii. managing the adverse effects of other activities on infrastructure, including managing reverse sensitivity; 3. the nature, timing and sequencing of new development and new infrastructure is integrated and coordinated; and 4. encourage more environmentally sustainable outcomes as part of subdivision and development, including though the use of energy efficient buildings, green infrastructure and renewable electricity generation.	development enables further improvements and upgrades to the Council reticulation. 3. LLRZ development in San Dona will contribute to existing infrastructure as required at the time of subdivision. 4. It is a more environmentally and sustainable outcome to allow LLRZ development of San Dona to better use land that is not productive for olive oil production.	
SD – 04 Rural Land	San Dona Assessment (LLRZ)	Submission point
Outside of identified residential development areas and the Special Purpose Zone (Kāinga Nohoanga), rural land is managed to ensure that it remains available for productive rural activities by: 1. providing for rural production activities, activities that directly support rural production activities and activities reliant on the natural resources of Rural Zones and limit other activities; and 2. ensuring that within rural areas the establishment and operation of rural production activities are not limited by new incompatible sensitive activities.	The majority of Mandeville has now been identified as an urban area, however it is not an Identified Residential development area nor a Special Purpose Zone. The rezoning of San Dona from Rural to LLRZ will: 1. Recognise that San Dona is <u>not a rural production area</u> that requires or is reliant on the natural resources of the Rural zone. Recognise that San Dona <u>does not need</u> to be limited/restricted to use of other rural activities only due to existing 1.2-1.8ha land area per allotment. 2. Continue to enable other more 'rural' areas to establish and operate rural production activities on the periphery of San Dona. No change to the status quo in this regard. San Dona is not consistent with this objective as it is not contributing to the District as Rural Productive land.	No proposed change requested to Objective SD-04. Neutral in respect of Objective SD-04.

SD-05 Ngāi Tahu mana whenua/Te Ngāi Tūāhuriri Rūnanga	San Dona Assessment (LLRZ)	Submission point
Te Ngāi Tūāhuriri Rūnanga's role in the management of natural and physical resources is recognised, so that: 1. Ngāi Tūāhuriri's historic and contemporary connections, and cultural and spiritual values, associated with the land, water and other taonga are recognised and provided for; 2. the values of identified sites and areas of significance to Ngāi Tūāhuriri are protected; 3. Ngāi Tūāhuriri can retain, and enhance access to sites of cultural significance; 4. Māori land is able to be occupied and used by Ngāi Tūāhuriri for its intended purposes and to maintain their relationship with their ancestral land; 5. recognised customary rights are protected; 6. Ngāi Tūāhuriri are able to carry out customary activities in accordance with tikanga; and 7. Te Ngāi Tūāhuriri Rūnanga are able to actively participate in decision-making and exercise kaitiakitanga.	The majority of Mandeville has now been identified as an urban area. The rezoning of San Dona from Rural to LLRZ will: 1.- 7. Not change the role of Ngāi Tūāhuriri Rūnanga in the management of natural and physical resources of the District.	Submission is neutral to Objective SD-05.
SD – 06 Natural hazards and resilience	San Dona Assessment (LLRZ)	Submission point
The District responds to natural hazard risk, including increased risk as a result of climate change, through: 1. avoiding subdivision, use and development where the risk is unacceptable; and 2. mitigating other natural hazard risks.	The majority of Mandeville has now been identified as an urban area. The rezoning of San Dona from Rural to LLRZ will: 1. & 2. Still require natural hazard assessment under s.106 of the RMA at the time of subdivision to create new allotments, the same as any other subdivision in the District.	No proposed change requested to Objective SD-06. Support Objective SD-06.

	The rezoning of San Dona will be consistent with this objective.	
Urban Form and Development Objectives		
UFD-01 Feasible development capacity for residential activities	San Dona Assessment (LLRZ)	Submission point
Sufficient feasible development capacity for residential activity to meet specified housing bottom lines and a changing demographic profile of the District as follows: Short to Medium Term (2018-2028) 6,300 residential units Long Term (2028-2048) 7,100 residential units 30 Year Time frame (2018-2048) 13,400 residential units	The majority of Mandeville has now been identified as an urban area. The rezoning of San Dona from Rural to LLRZ will contribute a limited amount (based on existing lot size and available change of density of those existing lots) to the housing demand. The rezoning will be consistent with this objective.	No proposed change requested to Objective UFD-01. Support Objective UFD-01.
UFD-02 Feasible development capacity for commercial activities and industrial activities	San Dona Assessment (LLRZ)	Submission point
Sufficient feasible development capacity to meet commercial and industrial development demand.	The majority of Mandeville has now been identified as an urban area. No proposed development capacity for commercial or industrial activity is sought.	Submission is neutral in respect of Objective UFD-02.

Energy and Infrastructure Objectives and Policies		
EI-O1 Provision of energy and infrastructure	San Dona Assessment (LLRZ)	Submission point
Across the District: 1. efficient, effective, resilient, safe and sustainable energy and infrastructure, including critical infrastructure, strategic infrastructure and regionally significant infrastructure, is developed and maintained to benefit the social, economic, cultural and environmental well-being of the District, including in response to future needs such as increased sustainability, and changing techniques and technology; 2. there is increased renewable energy for national, regional and local use; and 3. there is greater renewable electricity generation, including small scale or community scale renewable electricity generation, with generation surplus able to be supplied to the electricity distribution network.	This objective applies to whole District therefore applies to San Dona regardless of proposed re-zoning.	No Change is proposed to EI-O1 Submission is neutral in respect of EI-O1
EI-O2 Adverse effects of energy and infrastructure	San Dona Assessment (LLRZ)	Submission point
Adverse effects of energy and infrastructure on the qualities and characteristics of surrounding environments and community well-being are avoided, remedied or mitigated.	This objective applies to whole District therefore applies to San Dona regardless of proposed re-zoning.	No Change is proposed to EI-O2 Submission is neutral in respect of EI-O2
EI-O3 Effects of other activities and development on energy and infrastructure	San Dona Assessment (LLRZ)	Submission point
The safe, efficient and effective operation, maintenance, repair, renewal, upgrading and development of energy and infrastructure is not constrained or compromised by activities and	This objective applies to whole District therefore applies to San Dona regardless of proposed re-zoning. It is appropriate that this objective apply to San Dona given it is surrounded on northern,	No Change is proposed to EI-O3 Submission is supportive of EI-O3

development, including by reverse sensitivity effects.	north-western and eastern sides by Rural Lifestyle zoning.	
Energy and Infrastructure Policies		
EI-P1 Recognising the benefits of, and providing for, energy and infrastructure	San Dona Assessment (LLRZ)	Submission point
Recognise the local, regional or national benefits of energy and infrastructure through: 1. enabling the operation, maintenance, repair, renewal, removal and minor upgrade of energy and infrastructure; 2. providing for more than minor or significant upgrades to existing, and the development of new, energy and infrastructure; 3. providing for energy and infrastructure that serves as a lifeline utility during an emergency, including critical infrastructure, strategic infrastructure and regionally significant infrastructure; 4. providing for the effective, safe, secure and efficient electricity transmission, including on the National Grid, electricity distribution, and supply of fuel and energy; 5. providing for the effective, reliable and future-proofed communication networks and services; 6. providing for the effective, resilient, efficient and safe water supply, wastewater system and stormwater infrastructure; and community scale irrigation/stockwater; 7. enabling energy and infrastructure that has a particular focus on the utilisation of renewable resources and which contribute to	The proposed re-zoning will require additional connections to infrastructure operated and maintained by Council and other network utility operators. Infrastructure upgrades may be necessary. This policy applies to the District and therefore is the proposed change in zone from Rural Lifestyle to Large Lot Residential Zone makes no difference to the policy as proposed.	No Change is proposed to EI-P1 Submission is neutral in respect of EI-P1.

sustainable use of natural and physical resources; 8. enabling feasibility investigations into renewable energy including for renewable electricity generation; 9. providing for renewable energy and renewable electricity generation including small scale or community scale renewable electricity generation; and 10. the provision of an adequate supply of water for firefighting in accordance with SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice.		
EI-P2 Availability, provision and adequacy of, and connection to, energy and infrastructure	San Dona Assessment (LLRZ)	Submission point
Across the District: 1. to benefit the social, economic, cultural and environmental well-being of the District: a. ensure land use and development is coordinated with, and to the extent considered reasonably practicable, connected to and adequately serviced by energy and infrastructure, if available, including electricity, water supply, wastewater system and stormwater infrastructure; and b. ensure that connectivity to communications infrastructure can be achieved; and 2. where a public reticulated water supply or wastewater system is not available, adequate on site systems shall be installed consistent with maintaining public health and avoiding	The proposed re-zoning will require additional connections to reticulated infrastructure operated and maintained by Council and other network utility operators. Infrastructure upgrades may be necessary. This policy applies to the District and therefore is the proposed change in zone from Rural Lifestyle to Large Lot Residential Zone makes no difference to the policy as proposed.	No Change is proposed to EI-P2 Submission is supportive of EI-P2.

or mitigating adverse effects on the environment, while discouraging small scale stand alone systems.		
EI-P3 New technologies and technique	San Dona Assessment (LLRZ)	Submission point
Provide flexibility for energy and infrastructure to adopt new technologies and techniques that: 1. improve access to, and efficient use of, networks and services; 2. allow for the re-use of redundant services and structures; 3. increase resilience, safety or reliability of networks and services; and 4. result in environmental benefits and enhancements.	The proposed re-zoning will require additional connections to reticulated infrastructure operated and maintained by Council and other network utility operators. Infrastructure upgrades may be necessary. Flexibility in potential engineering solutions that allow for new technologies is an appropriate response to servicing requirements.	No Change is proposed to EI-P3 Submission is supportive of EI-P3.
EI-P4 Environmentally sustainable outcomes	San Dona Assessment (LLRZ)	Submission point
Seek more environmentally sustainable outcomes associated with energy and infrastructure, including by promoting: 1. the use of green infrastructure; 2. the increased utilisation of renewable resources; 3. the use of low impact approaches (such as in site, route or structure selection or construction methodology); 4. using low carbon materials in construction; 5. changing the way activities that generate high greenhouse gas emissions are delivered; 6. offsetting greenhouse gas emissions through activities such as planting carbon sequestering trees or the establishment and restoration of wetlands; 7. energy efficiency and conservation practices, including use of energy efficient design,	This policy applies District wide and does not relate specifically to a zone or the submission request for rezoning.	No Change is proposed to EI-P4. Submission is neutral in regard to EI-P4.

renewable energy and renewable electricity generation; and 8. building design with a Homestar™ certification rating of at least 6 for residential buildings, or a Green Star rating of at least 4 for commercial buildings, to assist in reducing energy consumption and greenhouse gas emissions.		
EI-P5 Manage adverse effects of energy and infrastructure	San Dona Assessment (LLRZ)	Submission point
Manage adverse effects of energy and infrastructure, including by the following: 1. enabling or providing for the ongoing operation, maintenance, repair, renewal, removal and minor upgrade of existing energy and infrastructure; 2. avoiding, remedying or mitigating adverse effects of more than minor upgrades to existing energy and infrastructure, including effects on: a. natural and physical resources; b. amenity values; c. sensitive activity; d. the safe and efficient operation of other infrastructure; e. the health, safety and well-being of people and communities; 3. new energy and infrastructure, or major upgrades to existing energy and infrastructure, should, to the extent considered practicable, ensure that the route or site is located outside of the following types of sensitive environments to protect	The proposed re-zoning will require additional connections to reticulated infrastructure operated and maintained by Council and other network utility operators. Infrastructure upgrades may be necessary.	No Change is proposed to EI-P5. Submission is neutral in regard to EI-P5.

such environments from significant adverse effects, taking into account the constraints imposed by the functional need or operational need of the energy and infrastructure: a. ONF, ONL and SAL; b. areas of ONC, VHNC and HNC, and natural character of scheduled freshwater bodies setbacks; c. SNAs; d. buildings, other structures and settings with heritage values, and archaeological sites; e. SASM; f. places adjoining the coastal marine area; 4. where new energy and infrastructure, or major upgrades to existing energy and infrastructure, cannot locate outside of the sensitive environments in (3) above, the energy and infrastructure should, to the extent considered practicable, ensure that the proposed route, site, structure and construction method demonstrate the following, taking into account the constraints imposed by the functional need or operational need of the energy and infrastructure: a. energy and infrastructure will be located in more compromised parts of the areas in (3) above where that reduces adverse effects on the values of those areas; b. techniques (such as structure selection or construction methodology) will be used to		
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mitigate adverse effects on the areas in (3) above; c. adverse effects on the areas in (3) above will be remedied or mitigated; 5. consider biodiversity offset for residual adverse effects on indigenous biodiversity that cannot otherwise be avoided, remedied or mitigated; 6. avoiding or mitigating potential significant adverse effects of the generation of radio frequency fields and electric and magnetic fields by requiring compliance with recognised standards or guidelines; and 7. promoting the undergrounding of new energy and infrastructure where it is: a. technically feasible; b. economically viable; c. justified by the extent of adverse visual effects if not placed underground.		
EI-P6 Effects of other activities and development on energy and infrastructure	San Dona Assessment (LLRZ)	Submission point
Manage adverse effects of other activities and development on energy and infrastructure, including by the following: 1. ensuring such effects do not compromise or constrain access to or the safe, effective and efficient operation, maintenance, repair, upgrading and development of energy and infrastructure; and 2. with regards to the National Grid and major electricity distribution lines, in addition to (1) above, by ensuring that:	The proposed re-zoning will require additional connections to reticulated infrastructure operated and maintained by Council and other network utility operators. Infrastructure upgrades may be necessary to accommodate development. It is appropriate that the development ensure effects on infrastructure are considered at the time of consent.	No Change is proposed to EI-P6. Submission is neutral in regard to EI-P6.

a. safe buffer distances are identified in the District Plan for managing the effects of incompatible activities and development on the National Grid and major electricity distribution lines including support structures; b. sensitive activity and development that may compromise the National Grid and major electricity distribution lines, including those associated with intensive farming activities, are excluded from establishing within identified safe buffer distances; c. changes to existing activities within identified safe buffer distances do not further constrain or restrict the operation, maintenance, repair, upgrading and development of the National Grid and major electricity distribution lines; and 3. ensuring buildings, other structures and vegetation do not obstruct or otherwise adversely affect radiocommunication pathways, either individually or cumulatively, including for radiocommunication associated with critical infrastructure, strategic infrastructure, regionally significant infrastructure, a lifeline utility, and for emergency purposes and day to day operations of an emergency service.		
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Subdivision Objectives, Policies and Rules		
Objectives		
SUB-01 Subdivision Design	San Dona Assessment (LLRZ)	Submission point
Subdivision design achieves an integrated pattern of land use, development, and urban form, that: 1. provides for anticipated land use and density that achieve the identified future character, form or function of zones; 2. consolidates urban development and maintains rural character except where required for, and identified by, the District Council for urban development; 3. supports protection of cultural and heritage values, conservation values; and 4. supports community resilience to climate change and risk from natural hazards.	The majority of Mandeville has now been identified as an urban area. The rezoning of San Dona from Rural to LLRZ will enable an integrated pattern of land use and subdivision within the existing Mandeville village urban form that: 1. can provide land use and density at subdivision stage that continues the character, form and function of the village. 2. Consolidates the Mandeville village and can maintain the existing character 3. Is neutral in regard cultural, heritage and conservation values (as there are none identified in this area) 4. Can be designed to be resilient to natural hazards (particularly in relation to flooding) by determination of appropriate floor levels and access points at the time of subdivision. The rezoning will be consistent with this objective.	No proposed change requested to Objective SUB-01. Support Objective SUB-01.
SUB-02 Infrastructure and Transport	San Dona Assessment (LLRZ)	Submission point
Efficient and sustainable provision, use and maintenance of infrastructure; and a legible, accessible, well connected transport system for all transport modes.	The majority of Mandeville has now been identified as an urban area. The rezoning of San Dona from Rural to LLRZ will in some instances will enable further subdivision. Further development will enable provision, use and maintenance of all existing WDC infrastructure and will contribute to the rating	No proposed change requested to Objective SUB-02. Support Objective SUB-02.

	base and Development Contribution planned upgrades as necessary. The rezoning will be consistent with this objective.	
SUB-03 Esplanade Reserves and Esplanade Strips	San Dona Assessment (LLRZ)	Submission point
Esplanade reserves and esplanade strips created through subdivision adjacent to the sea, lakes and rivers contribute to: 1. the protection of conservation values; 2. public access to or along rivers and lakes or the coast; or 3. enable public recreational use where it is compatible with conservation values.	N/A to San Dona	Submission is neutral in respect of SUB-03.
Policies		
SUB-P1 Design and Amenity	San Dona Assessment (LLRZ)	Submission Point
Enable subdivision that: 1. within Residential Zones, incorporates best practice urban design, access to open space, and CPTED principles; 2. minimises reverse sensitivity effects on infrastructure including through the use of setbacks; 3. avoids subdivision that restricts the operation, maintenance, upgrading and development of the National Grid; 4. recognises and provides for the expression of cultural values of mana whenua and their connections in subdivision design; and 5. supports the character, amenity values, form and function for the relevant zone.	The majority of Mandeville has now been identified as an urban area. The rezoning of San Dona from Rural to LLRZ will be able to be undertaken in a way that is highly consistent with this policy.	No changes are requested to Policy SUB-P2. The submission supports Policy SUB-P2.

SUB-P2 Allotment Size, Layout and Dimension	San Dona Assessment (LLRZ)	Submission Point
Ensure that allotment layout, size and dimensions: 1. in Residential Zones: a. enables a variety of allotment sizes to cater for different housing types and densities to meet housing needs; b. supports the achievement of high quality urban design principles for multi-unit residential development; 2. in Rural Zones: a. retains the ability for rural land to be used for primary production activities; and 3. in Open Space and Recreation Zones: a. provides a variety of types and sizes of open space and recreation areas to meet current and future recreation needs.	The majority of Mandeville has now been identified as an urban/residential area. The rezoning of San Dona from Rural area to a LLRZ residential will require a change from SUB-P2 (2) applying to further development to SUB-P2 (1) applying instead. As discussed elsewhere, the San Dona area is not viably creating or achieving primary production expected of a rural area and as such, the residential part of the policy applying is considered to be appropriate. The further development of San Dona allotments would be able to be consistent with Policy SUB-P2.	No changes are requested to Policy SUB-P2. The submission supports Policy SUB-P2.
SUB-P3 Sustainable Design	San Dona Assessment (LLRZ)	Submission Point
Ensure that subdivision design: 1. maximises solar gain, including through: a. road and block layout; and b. allotment size, dimension, layout and orientation; 2. in Residential Zones, Commercial and Mixed Use Zones, and Open Space and Recreation Zones, supports walking, cycling and public transport; and 3. promotes: a. water conservation, b. on-site collection of rainwater for non-potable use, c. water sensitive design, and	The rezoning of San Dona from Rural to LLRZ will enable further subdivision that can consider allotment size and layout on a site by site basis. It is unlikely that any new roads will be required for infill development. The promotion of water conservation, onsite collection of rainwater, water sensitive design and the attenuation of stormwater are all logical outcomes for the servicing and consideration of further development in San Dona given the complexity of the existing servicing situation, as is the need to maintain capacity of the infrastructure, while avoiding downstream flooding effects. Proposed new house site	No changes are requested to Policy SUB-P3. The submission supports Policy SUB-P3.

d. the treatment and/or attenuation of stormwater prior to discharge, and 4. recognises the need to maintain the design capacity of infrastructure within the public network and avoid causing flooding of downstream properties.	locations can be designed to mitigate any existing overland flood flow paths and can ensure appropriate minimum floor levels are achieved. The further development of San Dona allotments will be highly consistent with this policy.	
SUB-P4 Integration and Connectivity	San Dona Assessment (LLRZ)	Submission Point
Achieve integration and connectivity by ensuring: 1. in urban environments that there is effective integration of subdivision patterns and multi-modal transport connections within new development and to existing development; 2. subdivision on the boundaries between new and existing development is managed to: a. avoid or mitigate significant adverse effects, including reverse sensitivity effects, through the use of setbacks, landscaping to achieve screening, and other methods; and b. continuation of transport and pedestrian or cycle linkages.	The majority of Mandeville has now been identified as an urban area. The rezoning of San Dona from Rural to LLRZ will better integrate San Dona with the rest of the existing Mandeville environment. Setbacks, landscaping, existing screening and reverse sensitivity effects can be managed by providing a consistent zoning across Mandeville which will avoid the situation of requiring different requirements and different anticipated outcomes, especially given that the existing San Dona development (lot areas) already does not achieve minimum standards anticipated for the rural zone.	No change is requested to Policy SUB-P4. Submission supports Policy SUB-P4.
SUB-P5 Density in Residential Zones	San Dona Assessment (LLRZ)	Submission Point
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.	The majority of Mandeville has now been identified as a residential area. The rezoning of San Dona from Rural to LLRZ will enable further development on a site by site basis dependent on the aspirations of existing land owners. Not necessarily all existing allotments would be developed and of those that would be able to develop, some may achieve 3 allotments and some may only achieve 2. This will be consistent with the policy as it will result	No change is proposed to Policy SUB- P5. Submission Supports policy SUB-P5.

	in a variety of site sizes within San Dona, contributing to housing choice.	
SUB-P6 Criteria for Outline Development Plans	San Dona Assessment (LLRZ)	Submission Point
Ensure that new Residential Development Areas, new Large Lot Residential Zones, new Commercial and Mixed Use Zones and new Industrial Zones shall not be subdivided until an ODP for that area has been included in the District Plan and each ODP shall: 1. be prepared as a single plan; and 2. be prepared in accordance with the following: a. identify principal roads, connections and integration with the surrounding road networks, relevant infrastructure and areas for possible future development; b. any land to be set aside: i. for community facilities or schools; ii. parks and land required for recreation or reserves; iii. for business activities; iv. the distribution of different residential densities; v. for the integrated management of water systems, including stormwater treatment, secondary flow paths, retention and drainage paths; vi. from development for environmental or landscape protection or enhancement; and	The rezoning of San Dona from Rural to LLRZ will not require an Outline Plan to be prepared. San Dona will not be a <i>new</i> development as it already exists. The development of properties within San Dona will be undertaken as infill development that is managed by zone built form setbacks, site coverage and subdivision layout considerations at a scale of detail that is on a site by site basis. ODP's are effective at achieving integrated and coordinated development in a Greenfield situation. As such this policy would not apply to the San Dona situation.	No change is proposed to Policy SUB-P6. Submission is neutral on SUB-P6.

vii. from development for any other reason, and the reasons for its protection. c. for new Residential Development Areas demonstrate how each ODP area will achieve a minimum net density of at least 15 lots or households per ha, unless there are demonstrated constraints then no less than 12 households per ha; d. identify any cultural, natural, and historic heritage features and values and show how they are to be enhanced or maintained; e. indicate how required infrastructure will be provided and how it will be funded; f. set out the phasing and co-ordination of subdivision and development; g. demonstrate how effective provision is made for a range of transport options, including public transport systems, pedestrian walkways and cycleways, both within and adjoining the ODP area; h. for new Residential Development Areas, demonstrate how open space, playgrounds or parks for recreation will be provided within a 500m radius of new residential allotments including: i. transport connectivity for active, public and other transport modes; ii. connection to any other open space or community facility and other zones; and		
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iii. potential use of open space for stormwater management; i. show how other potential adverse effects on and/or from nearby existing or designated strategic infrastructure (including requirements for designations, or planned infrastructure) will be avoided, remedied or appropriately mitigated; j. show how other potential adverse effects on the environment, the protection and enhancement of surface and groundwater quality, are to be avoided, remedied or mitigated; k. include any other information which is relevant to an understanding of the development and its proposed zoning; and l. demonstrate that the design will minimise any reverse sensitivity effects.		
SUB-P7 Requirements of Outline Development Plans	San Dona Assessment (LLRZ)	Submission Point
Ensure that subdivision is in accordance with the fixed or flexible elements of any relevant ODP.	The rezoning of San Dona from Rural to LLRZ will not require an Outline Plan to be prepared. The development properties within San Dona will be infill development that is managed by zone built form setbacks, site coverage and subdivision layout considerations at a scale of detail on a site by site basis. ODP's are effective at achieving integrated and coordinated development when in a Greenfield situation. As such this would not apply to San Dona.	No change is proposed to Policy SUB-P7. Submission is neutral on SUB-P7.

SUB-P8 Infrastructure	San Dona Assessment (LLRZ)	Submission Point
Achieve integrated and comprehensive infrastructure with subdivision by ensuring: 1. 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; 2. adequate infrastructure provision and capacity to service the scale and nature of anticipated land uses, including: a. wastewater disposal that will maintain public health and minimise adverse effects on the environment, while discouraging small-scale standalone community facilities; b. water supply; c. stormwater management; d. phone, internet and broadband connectivity can be achieved, with new lines being underground in urban environments, except within the Special Purpose Zone (Kāinga Nohoanga); e. electricity supply, with new lines being underground in new urban environments except within the Special Purpose Zone (Kāinga Nohoanga); 3. where reticulated wastewater disposal is available, that any new site is to be provided with a means of connection to the system; and	The majority of Mandeville has now been identified as an urban area. The rezoning of San Dona from Rural to LLRZ will enable infill development, however this additional development will need to meet the subdivision infrastructure requirements the same as any other subdivision or development area in the District. For San Dona and our property, we understand that this will need to take specific account of the complex San Dona and Mandeville servicing situation at the time of subdivision consent application. We expect to need to provide engineering investigation and reporting to prove that the new infill allotments are able to be serviced, that capacity exists or where capacity does not exist, that existing services will be upgraded to suit or offset by onsite specific solutions. Development Contributions will be payable in accordance with LGA policy to contribute to the ongoing Council maintenance costs of infrastructure. 1. This may require the upgrade of existing infrastructure downstream of our property to enable further infill subdivision to occur at land owner/developer cost; 2. Must provide adequate infrastructure and capacity for each new allotment that is likely to be; a. New reticulated wastewater connections to Council's existing STEP system,	No proposed change requested to Policy SUB-P8 Infrastructure as this is a reasonable and standard expectation for all subdivision in any part of the District. Submission supports Policy SUB-P9 Infrastructure.

4. where a reticulated wastewater system is not available, ensure that onsite treatment systems will be installed.	b. Water supply is likely to continue as restricted supply requiring onsite water storage tanks for firefighting as per the current situation, c. Stormwater management solutions for each allotment which is likely to continue to be primary discharge to onsite soakage supplemented by onsite attenuation where necessary for times of high groundwater. d. Utility services will be provided in accordance with Utility Network provider requirements, e. Electrical services will be provided in accordance with Mainpower requirements 3. Wastewater must be reticulated in the San Dona area 4. N/A Wastewater must be reticulated in the San Dona area.	
SUB-P9 Access to, protection and enhancement of the margins of water bodies	San Dona Assessment (LLRZ)	Submission Point
During subdivision development: 1. ensure the protection and enhancement of the margins of water bodies; and 2. maintain the diversity, quality and quantity of any resources valued for mahinga kai through protection or restoration.	San Dona does not have any waterbodies to which Esplanade provisions would apply. This policy therefore has little relevance to the proposed re-zoning of San Dona.	No proposed change requested to Policy SUB-P9. Neutral in respect of SUB-P9.
SUB-P10 Esplanade Reserves and Esplanade Strips	San Dona Assessment (LLRZ)	Submission Point
Provide for the creation of esplanade reserves or esplanade strips in areas where there is an actual	San Dona does not have any waterbodies to which Esplanade provisions would apply.	No proposed change requested to Policy SUB-P10.

or potential benefit for access, recreation, conservation or natural hazard mitigation by: 1. identifying water bodies where such reserves or strips will be provided, regardless of subdivision site size; 2. recognising that provision of other areas that provide public benefit will be desirable; and 3. providing for minimum site sizes to be calculated as if any esplanade reserve resulting from the subdivision was part of the overall subdivision area.	This policy therefore has little relevance to the proposed re-zoning of San Dona.	Neutral in respect of SUB-P10
Subdivision Activity Rules		
Rule Assessment	San Dona Assessment (LLRZ)	Submission Point
SUB-R1 Boundary Adjustment To SUB-R3 Subdivision within the Liquefaction Overlay	All permitted, restricted discretionary, discretionary and non-complying rules are supported as they are appropriate methods to achieve the Subdivision objective and policies assessed above when applied to the San Dona situation.	No proposed changes are requested to Rules SUB-R1 to SUB-R3 inclusive. Support proposed rules in their entirety.
SUB-R4 Subdivision within Flood Hazard Areas Urban Flood Assessment Overlay Non-Urban Flood Assessment Overlay Coastal Flood Assessment Overlay	San Dona Assessment (LLRZ)	Submission Point
Activity status: RDIS 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	Our property (and San Dona) is currently located in the Non-Urban Flood Assessment Overlay on the basis the District Plan proposes that the site be located in the Rural Lifestyle Zone. The rest of Mandeville which is located in the LLRZ zone is identified as being in the Urban-Flood Assessment Overlay, for which the exact same rules apply for subdivision of such sites.	No changes are proposed to the rule. The requested change is to the Planning Maps for our property and San Dona to be LLRZ zone and noted as being Urban Flood Assessment Overlay for the purposes of this rule. Rule SUB-R4 is supported by the submission.

platform is not located within a high coastal flood hazard area; and 4. SUB-S1 to SUB-S18 are met. Matters of discretion are restricted to: Matters of control/discretion listed in SUB-R2 SUB-MCD5 - Natural Hazards 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	The rezoning of San Dona to LLRZ will result in the exact same rule, activity status and matters of discretion applying regardless of underlying zone.	
SUB-R5 Subdivision containing a site or area of significance to Māori - SUB-R11 Subdivision resulting in an allotment that is less than 4ha within the 50dBA Ldn noise contour for Christchurch International Airport	All permitted, restricted discretionary, discretionary and non-complying rules are supported as they are appropriate methods to achieve the Subdivision objective and policies assessed above when applied to the San Dona situation. Some rules are of no relevance to San Dona.	No proposed changes are requested to Rules SUB-R5 to SUB-R11 inclusive. Support proposed rules in their entirety.
Subdivision Standards		
SUB-S1 Allotment size and dimensions	San Dona Assessment (LLRZ)	Submission point
1. All allotments created shall comply with Table SUB-1. Table SUB-1 LLRZ: Net site area: 2,500m² with a minimum average of 5,000m² for allotments within the subdivision	Our property (and San Dona) is currently located in the Rural Lifestyle Zone. The rezoning of San Dona to LLRZ will result in the exact same rule applying except with a different minimum allotment area, however	No changes are proposed to the rule. The requested change is to the Planning Maps for our property and San Dona to be LLRZ zone for the purposes of this rule.

No Internal square No minimum frontage RLZ: net site area: 4Ha No internal square No minimum frontage Activity status when compliance not achieved: In the Medium Density Residential Zone, any Industrial Zone and Special Purpose Zone (Kaiapoi Regeneration): DIS In any other zone: NC	frontage and shape factors between the two zones remain unchanged. The activity status and matters of discretion are also unchanged regardless of underlying zone. (LLR and RL zone subdivisions are both Non-complying when not meeting minimum site size).	Rule SUB-S1 is supported by the submission.
SUB-S2 Identified building platforms and disposal areas in Rural Zones	San Dona Assessment (LLRZ)	Submission point
1. Any new allotment in the Rural Zones shall include one or more identified building platform, and a sewage disposal area, unless it is required to be serviced by a reticulated wastewater system. Activity status when compliance not achieved: NC	Our property (and San Dona) is currently located in the Rural Lifestyle Zone to which this rule would apply, however this exception in the rule would also apply given a reticulated wastewater system is available and San Dona sites do not have onsite wastewater disposal anyway. The rezoning of San Dona to LLRZ will result in this rule becoming “Not Applicable” however noting that subdivision in either case will require connection to reticulated wastewater services, as such there is no change to the status quo situation with the proposed LLRZ request.	No change is proposed to Subdivision Standard S2. The submission is neutral in respect of SUB-S2.
SUB-S3 Residential yield	San Dona Assessment (LLRZ)	Submission point
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	Our property (and San Dona) is currently located in the Rural Lifestyle Zone and this rule would not currently apply, however rezoning of San Dona to LLRZ will result in this rule becoming “Applicable” as a residential site.	No change is proposed to Subdivision Standard S3. The submission is neutral in respect of SUB-S3.

demonstrated constraints then no less than 12 households per ha. Activity status when compliance not achieved: NC	However the exception in the rule that relates to LLR zone would also apply. As such the rezoning remains neutral in respect of this standard.	
SUB-S4 Areas subject to an ODP	San Dona Assessment (LLRZ)	Submission point
1. Any subdivision shall comply with the relevant ODP and rules for the ODP, as set out in the Development Areas Chapter of the District Plan. Activity status when compliance not achieved: DIS	Our property (and San Dona) is currently located in the Rural Lifestyle Zone and this rule would not currently apply, however rezoning of San Dona to LLRZ will result in this rule becoming "Applicable" as a residential site. However, the anticipated development of San Dona would be a residential infill and therefore an ODP would not apply. As such the rezoning remains neutral in respect of this standard.	No change is proposed to Subdivision Standard S4. The submission is neutral in respect of SUB-S4.
SUB-S5 Legal and physical access	San Dona Assessment (LLRZ)	Submission point
1. Any allotment created shall have legal and physical access to a legal road. Activity status when compliance not achieved: NC	This rule applies to subdivision in all zones, therefore the rezoning to LLRZ remains neutral in respect of this standard.	No change is proposed to Subdivision Standard S5. The submission is neutral in respect of SUB-S5.
SUB-S6 Access to a strategic road or arterial road	San Dona Assessment (LLRZ)	Submission point
1. Any subdivision of a site in any Rural Zone that creates two or more new allotments that access onto a strategic road or arterial road, shall be jointly served by a single accessway. Activity status when compliance not achieved: DIS	This rule applies to subdivision in all zones, therefore the rezoning of San Dona to LLRZ remains neutral in respect of this standard.	No change is proposed to Subdivision Standard S6. The submission is neutral in respect of SUB-S6.

SUB-S7 Corner sites on road intersections in Residential Zones, Commercial and Mixed Use Zones, Special Purpose Zones, or Industrial Zones	San Dona Assessment (LLRZ)	Submission point
1. Any allotment created adjacent to any road intersection in Residential Zones, Commercial and Mixed Use Zones, Special Purpose Zones or Industrial Zones, shall, on the boundaries adjacent to the intersection, either: a. have a corner splayed with a diagonal line reducing each boundary by a minimum of 6m; or b. have a corner rounded to a radius of a minimum of 6m; and c. show the corner splay or corner rounding vesting as road. Activity status when compliance not achieved: NC	Our property (and San Dona) is currently located in the Rural Lifestyle Zone and this rule would not currently apply, however rezoning of San Dona to LLRZ will result in this rule becoming “Applicable” as a residential site. Our property is not located on a corner intersection and as such the rezoning remains neutral in respect of this standard. This will apply to any San Dona property that is located on a corner site.	No change is proposed to Subdivision Standard S7. The submission is supportive of SUB-S7.
SUB-S8 Corner sites on road intersections in Rural Zones	San Dona Assessment (LLRZ)	Submission point
1. The corner of any allotment at any road intersection in any subdivision in any Rural Zones, shall be splayed with a diagonal line reducing each boundary by: a. a minimum of 6m on local road or collector road; and b. a minimum of 15m on any strategic road or arterial road Activity status when compliance not achieved: NC	Our property (and San Dona) is currently located in the Rural Lifestyle Zone and this rule would currently apply, however rezoning of San Dona to LLRZ will result in this rule becoming “Not Applicable” as a residential site.	No change is proposed to Subdivision Standard S8. The submission is neutral in respect of SUB-S8.

SUB-S9 Potable water in Residential Zones, Commercial and Mixed Use Zones, Special Purpose Zones, or Industrial Zones	San Dona Assessment (LLRZ)	Submission point
1. Any new allotment created in Residential Zones, Commercial and Mixed Use Zones, Special Purpose Zones or Industrial Zones shall be served with: a. community reticulated potable water supply, where available, to the boundary; or b. where community reticulated potable water supply is not available, as described in rule EI-R45, potable water supply is to be provided by private reticulated potable water supply or potable groundwater. Activity status when compliance not achieved with SUB-S9 (1)(a): NC Activity status when compliance not achieved with SUB-S9 (1)(b): DIS	Our property (and San Dona) is currently located in the Rural Lifestyle Zone and this rule would currently not apply, however rezoning of San Dona to LLRZ will result in this rule becoming “Applicable” as a residential site.	No change is proposed to Subdivision Standard S9. The submission is supportive of SUB-S9.
SUB-S10 Potable water in Rural Zones	San Dona Assessment (LLRZ)	Submission point
1. Any new allotment in Rural Zones shall be served with community reticulated potable water supply, where available, private reticulated potable water supply or potable groundwater. Activity status when compliance not achieved: DIS	Our property (and San Dona) is currently located in the Rural Lifestyle Zone and is already supplied with a reticulated water supply, so this rule would continue to apply, however rezoning of San Dona to LLRZ will result in this rule becoming “Not Applicable” in favour of the application of standard S9 as a residential site.	No change is proposed to Subdivision Standard S10. The submission is neutral in respect of SUB-S10.

SUB-S11 Water supply for firefighting	San Dona Assessment (LLRZ)	Submission point
1. All new allotments intended for residential use shall demonstrate at the time of application for subdivision that: a. sufficient water supply and access to water supplies for firefighting is available to all residential units via the District Council's urban reticulated system (where available) in accordance with the SNZ PAS 4509:2008 New Zealand Fire Service firefighting water supplies code of practice; and b. where a reticulated water supply compliant with SNZ PAS:4509:2008 is not available, or the only supply available is the controlled restricted rural type water supply which is not compliant with SNZ PAS:4509:2008 water supply and access to water supplies for firefighting that is in compliance with the alternative firefighting water sources provisions of SNZ PAS 4509:2008 must be provided. Activity status when compliance not achieved: NC	This rule applies to subdivision in all zones, therefore the rezoning of San Dona to LLRZ remains neutral in respect of this standard.	No change is proposed to Subdivision Standard S11. The submission is neutral in respect of SUB-S11.
SUB-S12 Reticulated wastewater disposal in Residential Zones, Commercial and Mixed Use Zones, Special Purpose Zones, or Industrial Zones	San Dona Assessment (LLRZ)	Submission point
1. Any new allotment in Residential Zones, Commercial and Mixed Use Zones, Special Purpose Zones, or Industrial Zones shall be served:	Our property (and San Dona) is currently located in the Rural Lifestyle Zone and this rule would currently not apply, however rezoning of San	No change is proposed to Subdivision Standard S12. The submission is supportive of SUB-S12.

a. to the boundary by a reticulated wastewater system, where available; or b. where a reticulated wastewater system is not available as described in EI-R45, wastewater disposal is to be provided by on site waste water treatment services. Activity status when compliance not achieved: NC	Dona to LLRZ will result in this rule becoming "Applicable" as a residential site. San Dona is reticulated to the Council wastewater reticulated system via a STEP system. This will likely remain unchanged in principal and new wastewater connections will be provided as required.	
SUB-S13 Offsite wastewater disposal fields	San Dona Assessment (LLRZ)	Submission point
1. Any allotments developed for a community wastewater scheme that includes a separate wastewater disposal field on another site shall be held together in a manner that they cannot be disposed of separately without the express permission of the District Council. Activity status when compliance not achieved: NC	San Dona is reticulated to the Council wastewater reticulated system via a STEP system which does not have onsite wastewater effluent disposal fields. This will likely remain unchanged in principal and new wastewater connections will be provided as required. This rule continues not to be applicable to San Dona regardless of any change to LLRZ.	No change is proposed to Subdivision Standard S13. The submission is neutral in respect of SUB-S13.
SUB-S14 Electricity supply and communications connectivity	San Dona Assessment (LLRZ)	Submission point
1. Any new allotment shall be served by electricity supply and shall demonstrate at the time of application for subdivision that connection to communication infrastructure including phone, internet and broadband can be achieved. 2. Where two or more allotments share an accessway, the electricity supply and any communication lines necessary to achieve (1) shall be available where the accessway joins the main body of each allotment.	This rule applies to subdivision in all zones, therefore the rezoning of San Dona to LLRZ remains neutral in respect of this standard.	No change is proposed to Subdivision Standard S14. The submission is neutral in respect of SUB-S14.

Activity status when compliance not achieved: DIS		
SUB-S15 Stormwater disposal in Residential Zones, Commercial and Mixed Use Zones, Special Purpose Zones, or Industrial Zones	San Dona Assessment (LLRZ)	Submission point
1. Any new allotment in Residential Zones, Commercial and Mixed Use Zones, Industrial Zones or Special Purpose Zones shall demonstrate at the time of application for subdivision that it can be: - served by reticulated stormwater infrastructure where it is available at the boundary of the allotment; or - where no such infrastructure is available, provided with on-site stormwater disposal. Activity status when compliance not achieved: NC	Our property (and San Dona) is currently located in the Rural Lifestyle Zone and this rule would currently not apply, however rezoning of San Dona to LLRZ will result in this rule becoming "Applicable" as a residential site. San Dona is currently un-reticulated and disposes of Stormwater to onsite soakage, this will likely remain unchanged in principal however new consideration of attenuation for pre and post development stormwater disposal within San Dona may be required. The overarching requirement in the proposed standard for the onsite stormwater to be "demonstrated at the time of the application for subdivision" means that suitable technical design and consideration must be provided with the application and therefore no bespoke rule or wording change to the standard is required to capture this additional pre & post consideration.	No change is proposed to Subdivision Standard S15. The submission is neutral in respect of SUB-S15.
SUB-S16 Rural drainage	San Dona Assessment (LLRZ)	Submission point
1. Any new allotment in Rural Zones shall connect to a public drain if the allotment is within a rural drainage area.	Our property (and San Dona) is currently located in the Rural Lifestyle Zone and this rule would apply. The rezoning to LLRZ would make this rule "Not Applicable" to the site in favour of applying Standard S15 instead.	No change is proposed to Subdivision Standard S16. The submission is neutral in respect of SUB-S16.

Activity status when compliance not achieved: DIS		
SUB-S17 Esplanade reserves or strips	San Dona Assessment (LLRZ)	Submission point
1. An esplanade reserve or esplanade strip shall be created or set aside in the following circumstances: a. except where provided by (c), an esplanade reserve or esplanade strip shall be created or set aside for any allotment which is created on subdivision regardless of the size of the allotment created where any part of the land to be subdivided: i. adjoins or is crossed by a water body listed in Table SUB-2; or ii. adjoins the CMA boundary; b. the minimum width of an esplanade reserve or esplanade strip required under (a)(i) and (a)(ii) above shall be 20m. c. where any allotment of less than 4ha is created on subdivision an esplanade reserve or esplanade strip shall be created or set aside from that allotment along the bank of any other river or along the mark of MHWS of the sea; i. for the purpose of (c) above a river means a river whose bed has an average width of 3m or more where the river flows through or adjoins an allotment. Activity status when compliance not achieved: NC	This rule applies to subdivision in all zones, therefore the rezoning of San Dona to LLRZ remains neutral in respect of this standard.	No change is proposed to Subdivision Standard S17. The submission is neutral in respect of SUB-S17.

SUB-S18 Subdivision to create a bonus allotment	San Dona Assessment (LLRZ)	Submission point
1. Any subdivision for the protection and restoration of a mapped SNA listed in ECO-SCHED1 shall meet the requirements of Appendix APP2. Activity status when compliance not achieved: NC	This rule applies to subdivision in all zones, therefore the rezoning of San Dona to LLRZ remains neutral in respect of this standard.	No change is proposed to Subdivision Standard S18. The submission is neutral in respect of SUB-S18.

Natural Hazard Chapter Objectives, Policies and Rules		
Objectives		
NH-O1 Risk from natural hazards	San Dona Assessment (LLRZ)	Submission point
New subdivision, land use and development: - manages natural hazard risk, including coastal hazards, in the existing urban environment to ensure that any increased risk to people and property is low; - is avoided in the Ashley Fault Avoidance Overlay and high hazard areas for flooding outside of the urban environment where the risk to life and property are unacceptable; and - outside of the urban environment, is undertaken to ensure natural hazard risk, including coastal hazard risk, to people and property is avoided or mitigated and the ability of communities to recover from natural hazard events is not reduced.	The majority of Mandeville has now been identified as an urban area. The rezoning of San Dona from Rural to LLRZ will: - require the same management of natural hazard risk as the rest of Mandeville as an existing urban environment. - Is not in the Ashley Fault Avoidance Overlay or High Hazard Flooding Area. - Will remove consideration San Dona as “outside urban environment” for the purposes of the objective.	No change is proposed to NH-O1. The submission is neutral in respect of NH-O1.
NH-O2 Infrastructure in natural hazard overlays	San Dona Assessment (LLRZ)	Submission point
For infrastructure within natural hazard overlays:	Our property (and San Dona) is currently located in the Non-Urban Flood Assessment Overlay on	No Change is proposed to NH-O2.

- existing infrastructure can be upgraded, maintained and replaced; - new non-critical infrastructure does not increase the risk to life or property from natural hazard, including coastal hazard, events and is designed to maintain its integrity and ongoing function during and after natural hazard events, or is easily replaced; - critical infrastructure is avoided in high flood hazard areas and high coastal flood hazard areas, unless there is a functional need or operational need for the location or route.	the basis the District Plan proposes that the site be located in the Rural Lifestyle Zone. The rest of Mandeville which is located in the LLRZ zone is identified as being in the Urban-Flood Assessment Overlay. Regardless of zoning (proposed or requested), this objective applies to both areas in respect of new and existing infrastructure.	The submission is neutral in respect of NH-O2.
NH-O3 Natural hazard mitigation	San Dona Assessment (LLRZ)	Submission point
Adverse effects on people, property, infrastructure and the environment resulting from methods used to manage natural hazards are avoided or, where avoidance is not possible, mitigated.	This objective applies to all zones, therefore the rezoning of San Dona to LLRZ remains neutral in respect of this objective.	No Change is proposed to NH-O3. The submission is neutral in respect of NH-O3.
NH-O4 Natural defences	San Dona Assessment (LLRZ)	Submission point
Natural defences and systems are maintained to reduce the susceptibility of people, communities and property and infrastructure from natural hazard events	This objective applies to all zones, therefore the rezoning of San Dona to LLRZ remains neutral in respect of this objective.	No Change is proposed to NH-O4. The submission is neutral in respect of NH-O1.
Policies		
NH-P1 Identification of natural hazards and a risk-based approach	San Dona Assessment (LLRZ)	Submission point
Identify natural hazards, including coastal hazards, through the use of overlays and assess the risk for the management of subdivision, use and development within the overlays based on:	This policy and overlay approach applies to all zones, therefore the rezoning of San Dona to LLRZ is unaffected by the this policy.	No Change is proposed to NH-P1. The submission is supportive of NH-P1.

1. the sensitivity of the building occupation to loss of life, damage to property from a natural hazard and the ability for communities to recover after a natural hazard event; and 2. the level of hazard presented to people and property from a natural hazard, recognising that climate change will alter the frequency and severity of some natural hazard events.		
NH-P2 Activities in high hazard areas for flooding within urban areas	San Dona Assessment (LLRZ)	Submission point
Manage subdivision, use and development for natural hazard sensitive activities within high flood hazard and high coastal flood hazard urban environments to ensure that: 1. minimum floor levels are incorporated into the design of development to ensure the risk to life and potential for building damage from flooding is mitigated; and 2. the risk to surrounding properties is not significantly increased and the net flood storage capacity is not reduced; and 3. the conveyance of flood waters is not impeded; or 4. the nature of the activity means the risk to life and potential for building damage from flooding is low.	Our property (and San Dona) is currently located in the Non-Urban Flood Assessment Overlay on the basis the District Plan proposes that the site be located in the Rural Lifestyle Zone. The rest of Mandeville which is located in the LLRZ zone is identified as being in the Urban-Flood Assessment Overlay. The requested change is to the Planning Maps for our property (and San Dona) to be LLRZ zone and to be noted as being within the Urban Flood Assessment Overlay for the purposes of this policy and therein be considered to be within an 'urban area' so that this policy would apply. And site development (Subdivision and associated new housing) will need to comply with this policy as this policy applies to all development in any urban zone. It is appropriate that minimum floor levels, flood storage capacity, conveyance and mitigation to	No specific change is proposed to NH-P2. The requested change is to planning maps to change the site overlay from Non-Urban to Urban Flood Assessment Overlay so that San Dona be considered to be in an "urban area" and for this policy to apply to the site and surrounds. (Like the rest of Mandeville) The submission is supportive of NH-P2.

	achieve 'low risk' from flooding is considered fully at the time of further development when building platforms are known. It is noted that the District Planning maps do not identify the "High" Flood Hazard areas. Council's Website: "Waimakariri District Natural Hazards Interactive Viewer" confirms that in the 200 year localised flood event the site (and San Dona) is not in the "High Hazard" flood area. It is however in an overland flow path that would need to be appropriately considered in regard to this policy and 'management' of subdivision and development activities.	
NH-P3 Activities in high hazard areas for flooding outside of urban areas	San Dona Assessment (LLRZ)	Submission point
Avoid subdivision, use and development for natural hazard sensitive activities outside urban environments in high flood hazard and high coastal flood hazard urban environments unless: 1. the activity incorporates mitigation measures so that the risk to life, and building damage is low; 2. the risk from flooding to surrounding properties is not significantly increased; 3. the conveyance of flood waters is not impeded; and 4. the activity does not require new or upgraded community scale natural hazard mitigation works.	Our property (and San Dona) is currently within the Non-Urban Flood Assessment Overlay on the basis the District Plan proposes that the site be located in the Rural Lifestyle Zone. The rest of Mandeville which is located in the LLRZ zone is identified as being in the Urban-Flood Assessment Overlay. The requested change is to the Planning Maps for our property (and San Dona) to be LLRZ zone and to be noted as being within the Urban Flood Assessment Overlay. Therefore this policy would not apply to San Dona as it would no longer be 'outside' of an 'urban area'	No specific change is proposed to NH-P3. The requested change is to planning maps to change the site overlay from Non-Urban to Urban Flood Assessment Overlay so that San Dona be considered to be in an "urban area" and for this policy to <i>no longer apply</i> to the site and surrounds. (Like the rest of Mandeville) The submission is otherwise supportive of NH-P3.

	Further, it is noted that the District Plan does not identify the “High” Flood Hazard areas of the District. Council’s Website: Natural Hazards Interactive Viewer confirms that in the 200 year localised flood event the site (and San Dona) is not in the “High Hazard” flood area.	
NH-P4 Activities outside of high hazard areas for flooding	San Dona Assessment (LLRZ)	Submission point
Provide for subdivision, use and development associated with natural hazard sensitive activities outside of high flood hazard and high coastal flood hazard urban environments where it can be demonstrated that: 1. the nature of the activity means the risk to life and potential for building damage from flooding is low; or 2. minimum floor levels are incorporated into the design of development to ensure building floor levels are located above the flood level so that the risk to life and potential for building damage from flooding is avoided; and 3. the risk from flooding to surrounding properties is not significantly increased and the net flood storage capacity is not reduced; and 4. the ability for the conveyancing of flood waters is not impeded	Our property (and San Dona) is currently located in the Non-Urban Flood Assessment Overlay on the basis the District Plan proposes that the site be located in the Rural Lifestyle Zone. The rest of Mandeville which is located in the LLRZ zone is identified as being in the Urban-Flood Assessment Overlay. The requested change is to the Planning Maps for our property (and San Dona) to be LLRZ zone and to be noted as being within the Urban Flood Assessment Overlay for the purposes of this policy and therein be considered to be within an ‘urban environment’ so that this policy would apply. And site development (Subdivision and associated new housing) will need to (and should) comply with this policy as this policy applies to all development in any urban zone outside of high hazard flooding areas. It is noted that the District Planning maps do not identify the “High” Flood Hazard areas.	No specific change is proposed to NH-P4. The requested change is to planning maps to change the site overlay from Non-Urban to Urban Flood Assessment Overlay so that San Dona be considered to be in an “urban area” and for this policy to apply to the site and surrounds. (Like the rest of Mandeville) The submission is supportive of NH-P4.

	Council's Website: "Waimakariri District Natural Hazards Interactive Viewer" confirms that in the 200 year localised flood event the site (and San Dona) is not in the "High Hazard" flood area. It is however in an overland flow path that would need to be appropriately considered in regard to this policy for any future subdivision and development activities. It is appropriate that minimum floor levels, flood storage capacity, conveyance and measures for flooding are demonstrated at the time of further development when building platform locations and site specific site development is known. It is entirely possible to mitigate flood and drainage effects with appropriate site engineered design.	
NH-P5 Activities within the Fault Awareness Overlay and Ashley Fault Avoidance Overlay	San Dona Assessment (LLRZ)	Submission point
For activities within fault overlays: 1. only allow subdivision, use and development for natural hazard sensitive activities in the Ashley Fault Avoidance Overlay where the risk to life or property is low; and 2. manage subdivision in the Fault Awareness Overlay so that the risk to life and property is low.	The site is not located in a Fault awareness or Avoidance overlay. Policy is not applicable to our property or San Dona.	Submission is Neutral on Policy NH-P5.
NH-P6 Subdivision within the Liquefaction Hazard Overlay	San Dona Assessment (LLRZ)	Submission point
Manage subdivision within the Liquefaction Hazard Overlay to ensure that the risk to life and property is low.	Our property is located within the Liquefaction Hazard Overlay and this policy would apply if the site were able to be subdivided.	No change is proposed to NH-P6.

	Our submission is to request the site be rezoned from Rural Lifestyle (RLZ) to Large Lot Residential (LLRZ) which may enable some subdivision potential.	The change requested is to planning maps to rezone the site LLRZ and to be able to apply this policy. Submission supports Policy NH-P6.
NH-P7 Additions to existing natural hazard sensitive activities	San Dona Assessment (LLRZ)	Submission point
Provide for additions to buildings for existing natural hazard sensitive activities where it can be demonstrated that: 1. the additions provide for the continued use of the existing building; and 2. the change in on site risk from the building additions to life and property is low; and 3. the risk from the natural hazard to surrounding properties and people is not significantly increased.	This policy applies to all zones.	Submission supports Policy NH-P7.
NH-P8 Subdivision, use and development other than for any natural hazard sensitive activities	San Dona Assessment (LLRZ)	Submission point
Allow for subdivision, use and development associated with activities that are not natural hazard sensitive activities within all natural hazard overlays as there is a low risk to life and property.	This policy applies to all properties in the District.	Submission is neutral on Policy NH-P8.
NH-P9 Community scale natural hazard mitigation works	San Dona Assessment (LLRZ)	Submission point
Natural hazard mitigation works: 1. undertaken by the Crown, the Regional Council or the District Council are enabled where community scale natural hazard mitigation works are necessary to protect existing communities from natural hazard risk which cannot reasonably be avoided,	This policy applies across the District.	Submission is neutral on Policy NH-P9.

and any adverse effects on the values of any identified ONL, ONF, SAL, scheduled natural character areas, the coastal environment, and Sites and Areas of Significance to Māori are mitigated; or 2. not undertaken by the Crown, the Regional Council or the District Council, will only be acceptable where: a. the natural hazard risk cannot reasonably be avoided; b. any adverse effects of those works on the values of any areas identified as ONL, ONF, SAL, scheduled natural character areas and the coastal environment, and on sites and areas of significance to Māori are avoided, remedied or mitigated in accordance with the provisions in those chapters; c. the mitigation works do not transfer or create unacceptable hazard risk to other people, property, infrastructure or the natural environment; and d. the mitigation works do not involve the construction of private flood mitigation measures such as stopbanks, or floodwalls to protect new hazard sensitive activities as these works could result in significant residual risk to life or property if they fail.		
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NH-P10 Maintenance and operation of existing infrastructure	San Dona Assessment (LLRZ)	Submission point
Allow for the operation, maintenance, replacement, minor upgrading, repair and removal of all existing infrastructure in identified natural hazard overlays.	Policy applies across the District and to any existing infrastructure in Mandeville. The submission requests rezoning which may lead to new infrastructure being required, or upgrades being undertaken to existing infrastructure. Therefore no change is proposed.	Submission is supportive of Policy NH-P10
NH-P11 New below ground infrastructure and upgrading of infrastructure outside of high hazard areas	San Dona Assessment (LLRZ)	Submission point
Provide for new and upgrading of existing below ground infrastructure outside of high flood hazard and high coastal flood hazard areas, where: 1. if located within a flood assessment or coastal flood assessment overlay, the original ground level is reinstated at completion of the works; 2. it does not increase the risk to life or property from natural hazard events; 3. it does not result in a reduction in the ability of people and communities to recover from a natural hazard event; and 4. it is designed to maintain reasonable and safe operation during and after a natural hazard event.	Policy applies across the District and to any existing infrastructure in Mandeville which is located in the Urban Flood Assessment Overlay. San Dona is located in the Non-Urban Flood Assessment Overlay and is not considered to be in a High Hazard flood area. This policy applies in both situations notwithstanding the rezoning request. The submission requests rezoning which may lead to new infrastructure being required, or upgrades being undertaken to existing infrastructure. Therefore no change is proposed.	No change is proposed. Submission is supportive of Policy NH-P11.
NH-P12 New below ground infrastructure and upgrading of infrastructure within high flood hazard areas	San Dona Assessment (LLRZ)	Submission point
Provide for the installation of new and upgrading of existing below ground infrastructure in high	Not applicable to submission. The property is not located within a high flood hazard area.	No change is proposed. Submission is neutral of Policy NH-P12.

flood hazard or high coastal flood hazard areas where: 1. the infrastructure does not exacerbate the natural hazard risk or transfer the risk to another site; 2. the conveyance of flood waters is not impeded; 3. there is a functional need or operational need for the infrastructure to be located in a high flood hazard or high coastal flood hazard area and there are no practical alternatives; and 4. the location and design of the infrastructure address relevant natural hazard risk and appropriate measures have been incorporated into the design to provide for the continued operation.		
NH-P13 New above ground critical infrastructure and upgrading of critical infrastructure within high flood hazard areas	San Dona Assessment (LLRZ)	Submission point
Only allow for the new and upgrading of existing above ground critical infrastructure in high flood hazard or high coastal flood hazard areas where: 1. there is a functional need or operational need for that location and there are no practical alternatives; 2. the location and design of the infrastructure address relevant natural hazard risk and appropriate measures have been incorporated into the design to provide for the continued operation; and	Not applicable to submission. The property is not located within a high flood hazard or high coastal flood hazard area.	No change is requested. Submission is neutral on Policy NH-P13.

3. the infrastructure does not exacerbate the natural hazard risk or transfer the risk to another site.		
NH-P14 New infrastructure and upgrading of infrastructure within fault overlays	San Dona Assessment (LLRZ)	Submission point
Within the fault overlays: 1. provide for new and upgrading of existing not critical infrastructure below and above ground in the Ashley Fault Avoidance Overlay where: a. it does not increase the risk to life or property from a natural hazard event; and b. it does not result in a reduction in the ability of people and communities to recover from a natural hazard event; 2. avoid new and upgrading of existing critical infrastructure below and above ground in the Ashley Fault Avoidance Overlay unless there is no reasonable alternative, in which case the infrastructure must be designed to: a. maintain, as far as practicable, its integrity and ongoing operation during and after natural hazard events; or b. be able to be reinstated in a timely manner; 3. enable small scale critical infrastructure and other infrastructure in the Fault Awareness Overlay, while ensuring that larger critical infrastructure does not increase the risk to life or property from natural hazard events unless:	Not applicable. Site is not within a fault overlay.	Nil.

a. there is no reasonable alternative, in which case the infrastructure must be designed to maintain, as far as practicable, its integrity and ongoing operation during and after natural hazard events; or b. be able to be reinstated in a timely manner.		
NH-P15 Natural features providing natural hazard resilience	San Dona Assessment (LLRZ)	Submission point
Protect natural features which assist in avoiding or reducing the impacts from natural hazards, such as natural ponding areas, wetlands, water body margins and riparian margins, dunes, berms and beaches from inappropriate subdivision, use and development and restore, maintain or enhance the functioning of these features.	Our property (and San Dona) has a landform that naturally provides for an overland flowpath for localised flooding in an extreme event. Berms in the subdivision are wide and can cater for these if required however they are not 'natural features'. 'Water bodies' in the San Dona development consist of man made water races and drainage swales in streets and properties, which also are not 'natural features'. Subdivision use and development can be undertaken in a way that mitigates natural hazard effects and provides engineering design that accounts for overland flow, however this may not mean that the general landform is protected, restored, maintained, enhanced. This policy applies District wide, and does have some ambiguity in the wording that could be construed to be applied for any 'natural feature' which is not defined by the District Plan. A change to the policy wording is requested to ensure that it is applied as intended, with an	Oppose policy NH-P15 as proposed and request changes to the policy as shown below: Protect <u>natural features</u> which assist in avoiding or reducing the impacts from natural hazards, ~~such as natural ponding areas, wetlands, water body margins and riparian margins, dunes, berms and beaches~~ from inappropriate subdivision, use and development and restore, maintain or enhance the functioning of these features. Where: Natural Feature is defined as: <i>natural ponding areas, wetlands, water body margins and riparian margins, dunes, and beaches. Excludes man-made water races and drainage infrastructure such as swales and Stormwater Management Areas.</i>

	associated definition to be included for “natural feature”.	
NH-P16 Redevelopment and relocation in coastal hazard and natural hazard overlays	San Dona Assessment (LLRZ)	Submission point
Encourage redevelopment, or changes in land use where that would reduce the risk of adverse effects from natural hazards, including managed retreat and designing for relocation or recoverability from natural hazard events.	This policy best applies in Coastal Hazard and High flood hazard situations given the reference to managed retreat and relocation, however the policy does not distinguish this as it is proposed because it relates to all defined ‘natural hazards’. Much of the District (and San Dona) is located in the Urban Flood Assessment / Non-Urban Flood Assessment Overlay and Liquefaction Management areas and specific policies above (P3-P8, P11-P14) are intended to apply and enable various subdivision and development activities in the various hazard overlays in an appropriate way. Although the P16 policy does not acknowledge mitigation of the risk of natural hazard effects which are allowed by other policies, (it only refers to reduction of effects), it is written in a positive connotation to ‘encourage’ rather than to ‘protect’ or ‘avoid’ and therefore it does not seem to directly outweigh or contradict other natural hazard policies noted above. It would be concerning if the P16 policy were interpreted to be unsupportive of a redevelopment or change of use activity where adverse effects were ‘mitigated’ and not ‘reduced’. The ability/means for Council to ‘encourage’ under the RMA when enforcing the	Oppose policy NH-P16 as proposed and request changes to the policy as shown below: Encourage redevelopment₂ or changes in land use₂ where that would reduce <u>or mitigate</u> the risk of adverse effects from natural hazards, including managed retreat and designing for relocation or recoverability from natural hazard events.

	District Plan is limited and may only be to decline or notify a valid consent application which would be a perverse and negative outcome that would incur inefficient costs to applicants if it were to occur. For this reason, the mitigation of adverse hazard effects should also be acknowledged in the policy.	
NH-P17 Hard engineering natural hazard mitigation within the coastal environment	San Dona Assessment (LLRZ)	Submission point
Only allow hard engineering natural hazard mitigation within the coastal environment that reduces the risk of natural hazards when: 1. soft engineering measures would not provide an appropriate level of protection and it can be demonstrated that there are no other reasonable alternatives; 2. the construction of hard engineering measures will not increase the risk from coastal hazards on adjacent properties that are not protected by the hard engineering measures; 3. where managed retreat has not been adopted and there is an immediate risk to life or property from the natural hazard; 4. it avoids the modification or alteration of natural defences and systems in a way that would compromise their function as natural defences; and 5. significant adverse effects on natural defences and systems from those measures	Not applicable – Not in the Coastal Environment	Nil.

are avoided, and any other adverse effects are avoided, remedied or mitigated.		
NH-P18 Fire and ice risks	San Dona Assessment (LLRZ)	Submission point
Manage wildfire and vehicle crash risk on roads affected by ice hazard through restrictions on the planting of woodlots and shelterbelts.	Our property has shelterbelt (poplar hedging) on road boundaries and other properties in San Dona have Macrocarpa hedges which shade roads. We have not experienced any adverse effects of ice in winter nor wildfire in our area. There is no difference with this policy in respect of San Dona versus the rest of Mandeville with a change from Rural Lifestyle Zone to Large Lot Residential Zone (LLRZ).	No change is requested to this policy. Submission is neutral on policy NH-P18
NH-P19 Other natural hazards	San Dona Assessment (LLRZ)	Submission point
Encourage the consideration of other natural hazards as part of subdivision, use and development.	Given the comprehensive and detailed policies proposed in the Proposed Plan, this general policy seems superfluous and unnecessary given it simply 'encourages consideration of other' hazards. The DP and RMA both define 'natural hazards', and the RMA requires consideration of them in S.7 and in S.106 (for subdivision purposes). Noting that policies above do not specifically refer to all hazards mentioned in the definition of 'Natural Hazard'. Further, their consideration is required by proposed objectives NH-O1-04. Either the policy should be removed, or reference to what 'other' hazards are to be considered should be included.	Oppose NH-P19 and request its removal in entirety or clarification of the word 'other'. <u>NH-P19 Other Natural Hazards</u> <u>Encourage the consideration of other natural hazards as part of subdivision, use and development.</u> <u>Or</u> Encourage the consideration of <u>other earthquake, tsunami, erosion, volcanic and geothermal activity, landslip, subsidence, sedimentation, wind, drought, fire</u> natural hazards as part of subdivision, use and development.

Natural Hazard Activity Rules		
NH-R1 Natural hazard sensitive activities • Urban Flood Assessment Overlay • Kaiapoi Fixed Minimum Finished Floor Level Overlay	San Dona Assessment (LLRZ)	Submission point
Where: 1. the building is erected to the level specified in an existing consent notice that is less than five years old; or 2. the building: a. does not exceed the permitted building coverage for the zone; and i. if located within the Kaiapoi Fixed Minimum Finished Floor Level Overlay, the building has a finished floor level equal to or higher than the minimum finished floor level shown on the planning map; or ii. if not located within the Kaiapoi Fixed Minimum Finished Floor Level Overlay, the building 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 b. is not located within an overland flow path as stated in a Flood Assessment Certificate issued in accordance with NH-S1.	Our property (and San Dona) is currently located in the Rural Lifestyle Zone and this rule would currently not apply, however rezoning of San Dona to LLRZ will result in this rule becoming "Applicable" as a residential site and being changed to being located in the Urban Flood Assessment Overlay.	No change is proposed to NH-R1. The submission is supportive of NH-R1.
NH-R2 Natural hazard sensitive activities • Non-Urban Flood Assessment Overlay • Rural Zones	San Dona Assessment (LLRZ)	Submission point

Where: 1. the building is erected to the level specified in an existing consent notice that is less than five years old; or 2. if located within the Non-Urban Flood Assessment Overlay, the building: 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 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 c. is not located within an overland flow path as stated in a Flood Assessment Certificate issued in accordance with NH-S1; or 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. 400mm above the natural ground level; or ii. is equal to or higher than the minimum finished floor level as stated in a Flood Assessment Certificate issued in accordance with NH-S1.	Our property (and San Dona) is currently located in the Rural Lifestyle Zone and this rule would currently apply, however rezoning of San Dona to LLRZ will result in this rule becoming "Not Applicable" as a residential site and being changed to being located in the Urban Flood Assessment Overlay instead of a Non-Urban Flood Overlay.	No change is proposed to NH-R2. The submission is supportive of NH-R2.
NH-R3 Natural hazard sensitive addition to existing natural hazard sensitive activities • Urban Flood Assessment Overlay • Kaiapoi Fixed Minimum Finished Floor Level Overlay • Non-Urban Flood Assessment Overlay	San Dona Assessment (LLRZ)	Submission point

• Ashley Fault Avoidance Overlay • Rural Zones		
Where: 1. the addition to a building does not result in a new or additional natural hazard sensitive activity establishing on the site; and 2. the addition: a. is not located within the Ashley Fault Avoidance Overlay; or b. is erected to the level specified in an existing subdivision consent notice or on an approved subdivision consent plan that is less than five years old; or c. if located in the Kaiapoi Fixed Minimum Finished Floor Level Overlay, any building footprint addition has a finished floor level equal to or higher than the minimum finished floor level shown on the planning map; or d. if located within any Flood Assessment Overlay, the building footprint addition is: i. located on a site outside of a high flood hazard area as stated in a Flood Assessment Certificate issued in accordance with NH-S1; and ii. is not located within an overland flow path as stated in a Flood Assessment Certificate issued in accordance with NH-S1; and iii. has a finished floor level equal to or higher than the minimum finished floor level as stated in a Flood Assessment	Our property (and San Dona) is currently located in the Rural Lifestyle Zone and Non-Urban Flood Assessment Overlay and this rule would currently apply, however rezoning of San Dona to LLRZ will not change anything as this rule also applies in the Urban Flood Assessment Overlay.	No change is proposed to NH-R3. The submission is supportive of NH-R3.

Certificate issued in accordance with NH-S1; or e. 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. 400mm above the natural ground level; or ii. is equal to or higher than the minimum finished floor level as stated in a Flood Assessment Certificate issued in accordance with NH-S1.		
NH-R4 Below ground infrastructure and critical infrastructure - NH-R6 Above ground critical infrastructure • Fault Awareness Overlay • Urban Flood Assessment Overlay • Kaiapoi Fixed Minimum Finished Floor Level Overlay • Non-Urban Flood Assessment Overlay	San Dona Assessment (LLRZ)	Submission point
Rules R4-R6	Our property (and San Dona) is currently located in the Rural Lifestyle Zone and Non-Urban Flood Assessment Overlay and these rules would currently apply, however rezoning of San Dona to LLRZ will not change anything as this rule also applies in the Urban Flood Assessment Overlay.	No changes are proposed to NH-R4- R6. The submission is supportive of NH-R4 to NH-R6.
NH-R7 Woodlots and shelterbelts • Rural Zones	San Dona Assessment (LLRZ)	Submission point
Where:	Our property (and San Dona) is currently located in the Rural Lifestyle Zone and this rule would	No changes are proposed to NH-R7.

1. any woodlot or shelterbelt shall comply with the following fire hazard setback distances, measured from the outside extent of the canopy at the time of planting: a. 30m from any boundary of any adjoining site; and b. 10m from any road. 2. any woodlot or shelterbelt established on the north side of South Eyre Road, Tram Road, Oxford Road, or Birch Hill Road shall comply with the following ice hazard height and setback distances: a. trees adjoining the road boundary shall be maintained at a height of no greater than 3m; b. trees capable of growing up to 6m in height shall be setback 5m from the road boundary; and c. trees capable of growing 8m in height or higher shall be setback 15m from the road boundary.	currently apply, however rezoning of San Dona to LLRZ will mean that this rule becomes "Not Applicable". The rest of Mandeville is proposed by Council to be Large Lot Residential Zone and this new rule would not apply to the rest of the area. All large trees and shelterbelts in Mandeville (not just San Dona) are existing whether or not they back onto Tram Road, or exceed these heights or setbacks.	The submission is neutral of NH-R7.
NH-R8 Maintenance of existing community scale natural hazard mitigation works To NH-R14 New and upgrading of above and below ground critical infrastructure	San Dona Assessment (LLRZ)	Submission point
	Rules relate to construction of community scale infrastructure for Natural Hazards. These may be applicable to San Dona and Mandeville as a whole for overland flow and flooding works for the benefit of all properties.	No changes are proposed to rules NH-R8 – NH-R14 The submission is supportive of Rules R8-R14

	They are not applicable where they relate to the Ashely Fault Avoidance Overlay. These rules are supported without change.	
Coastal Hazard Rules NH-R15 - NH-R20	San Dona Assessment (LLRZ)	Submission point
	Not applicable to our property or San Dona	Nil.
Natural Hazard Standards		
NH-S1 Flood Assessment Certificate	San Dona Assessment (LLRZ)	Submission point
1. The District Council will issue a Flood Assessment Certificate (which will be valid for three years from the date of issue) that specifies: a. whether the activity is located on a site that is within a high flood hazard area; and b. whether the activity is located within an overland flow path; and 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 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 e. the minimum finished floor level shall be calculated as the highest of the following: i. flooding predicted to occur in a 0.5% AEP (1 in 200--year) Localised Rainfall Event plus up to 500mm freeboard; or	The submission requests rezoning from Rural Lifestyle Zone (RLZ) to Large Lot Residential Zone (LLRZ) which when successful, will require this standard to be applied for any subdivision and development under NH-R1 as part of the Urban Flood Assessment Overlay. For this reason the standard is supported as Council will provide a Flood Assessment Certificate which will ensure consistent administration of the District Plan and assessed flood levels, since Council holds the flood model information to prepare and issue such certificates. This will avoid case by case external costly flood assessments being undertaken at the time of individual subdivisions by developers and land owners.	No changes are proposed to NH-S1. Submission supports NH-S1.

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 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		
NH-S2 Coastal Flood Assessment Certificate	San Dona Assessment (LLRZ)	Submission point
	Not applicable to our property, San Dona or rezoning submission.	Nil.

Residential Chapter Objectives, Policies and Rules		
RESZ-O1 Residential growth, location and timing	San Dona Assessment (LLRZ)	Submission point
Sustainable residential growth that: d. provides more housing in appropriate locations in a timely manner according to growth needs; e. is responsive to community and district needs; and f. enables new development, as well as redevelopment of existing Residential Zones.	The majority of Mandeville has now been identified as an urban area. The rezoning of San Dona from Rural to LLRZ will: 1. enables more housing in an existing (and therefore appropriate) location 2. is responsive to the wishes of the San Dona community in the area 3. is enabling redevelopment as a more efficient land use. San Dona LLRZ would contribute to providing for sustainable residential growth in the popular Mandeville village area.	No proposed change requested to Objective RESZ-01. Support Objective RESZ-01.
RESZ-O2 Residential sustainability	San Dona Assessment (LLRZ)	Submission point
Efficient and sustainable use of residential land and infrastructure is provided through appropriate location of development and its design.	The majority of Mandeville has now been identified as an urban area. The rezoning of San Dona from Rural to LLRZ will recognise the existing contribution of San Dona residents to Mandeville infrastructure by enabling further efficient and sustainable use of land and infrastructure.	No proposed change requested to Objective RESZ-02. Support Objective RESZ-02.
RESZ-O3 Residential form, scale, design and amenity values	San Dona Assessment (LLRZ)	Submission point
A form, scale and design of development that: 1. achieves a good quality residential environment that is attractive and functional; 2. supports community health, safety and well-being; 3. maintains differences between zones; and	The majority of Mandeville has now been identified as an urban area. The rezoning of San Dona from Rural to LLRZ will enable San Dona to contribute to Mandeville village with the same form, scale and design of development by providing for infill within the bounds of the existing developed area.	No proposed change requested to Objective RESZ-03. Support Objective RESZ-03.

4. manages adverse effects on the surrounding environment.		
RESZ-04 Non-residential activities	San Dona Assessment (LLRZ)	Submission point
Small-scale non-residential activities that take place in residential areas support the function of local communities.	Agree that non-residential activities be small scale.	No proposed change requested to Objective RESZ-04. Support Objective RESZ-04.
RESZ-05 Housing choice	San Dona Assessment (LLRZ)	Submission point
Residential Zones provide for the needs of the community through: 1. a range of residential unit types; and 2. a variety of residential unit densities.	The majority of Mandeville has now been identified as an urban area. The rezoning of San Dona from Rural to LLRZ will enable an existing developed area to contribute to further housing choice in popular Mandeville, without encouraging sprawl into adjoining productive rural land, noting that San Dona is not considered to be productive rural land.	No proposed change requested to Objective RESZ-05. Support Objective RESZ-05.
Large Lot Residential Objectives and Policies		
LLRZ-01 Purpose, character and amenity values of Large Lot Residential Zone	San Dona Assessment (LLRZ)	Submission point
A high quality, low density residential zone with a character distinct to other Residential Zones such that the predominant character: 1. is of low density detached residential units set on generous sites; 2. has a predominance of open space over built form; 3. is an environment with generally low levels of noise, traffic, outdoor lighting, odour and dust; and 4. provides opportunities for agriculture activities where these do not detract from maintaining a quality residential	The majority of Mandeville has now been identified as an urban area. The rezoning of San Dona from Rural to LLRZ will enable a high quality, low density residential area with a character that: 1.&2. is low density detached residential units on generous sites the same as the rest of Mandeville village with similar environment, noise, traffic, lighting, odour and dust. 3. Will enable a continuation of existing activities for agriculture (olives for those that continue with these), not detracting from the quality residential environment that is Mandeville.	No proposed change requested to Objective LLRZ-01. Support Objective LLRZ-01.

environment, but provides limited opportunities for other activities.	The proposed zoning (LLR) of San Dona is highly consistent with the LLRZ Objective that applies to the quality of the Large Lot residential zone and consistency with the rest of Mandeville.	
LLRZ-P1 Maintaining the qualities and character	San Dona Assessment (LLRZ)	Submission point
Maintain the qualities and character of the Large Lot Residential Zone by: 1. achieving a low density residential environment with a built form dominated by detached residential units, which other than minor residential units, are established on their own separate sites; 2. managing the scale and location of buildings so as to maintain a sense of openness and space between buildings on adjoining sites and ensuring that open space predominates over built form on each site; 3. ensuring the built form for all activities is consistent with the low density residential character of the zone; and 4. retaining the open character and outlook from sites to rural areas through managing boundary fencing including the style of fencing, their height and visual permeability.	The majority of Mandeville has now been identified as an urban area. The rezoning of San Dona from Rural to LLRZ will: 1. be able to achieve low density residential environment that has a built form of detached residential units as further development is likely to be infill around existing dwellings, 2. Scale and location of buildings can be managed at the time of subdivision when considering existing houses and proposed building locations, 3. Built form will comply with low density character of the zone as specified by proposed rules for the zone, 4. Open character and outlook can be maintained as specified by proposed rules for the zone relating to fencing and or hedging. San Dona is already highly consistent with this policy and further infill development can also easily be highly consistent with the policy.	No proposed change requested to policy LLRZ-P1. Support Policy LLRZ-P1.
LLRZ-P2 Managing Activities	San Dona Assessment (LLRZ)	Submission point
Manage activities within the zone to maintain the character and amenity values of the zone including by:	The majority of Mandeville has now been identified as an urban area. The rezoning of San Dona from Rural to LLRZ will:	No proposed change requested to policy LLRZ-P2. Support Policy LLRZ-P2.

1. enabling residential activities and activities ancillary to residential activities, where the scale of activity does not dominate the residential use of the site; 2. providing for agricultural activities, and activities that support agricultural activities where any adverse effects are internalised within the site where the activity occurs; 3. providing for a limited range of community activities, and commercial activities which in terms of location, scale and type of activity are compatible with the predominant activities of the zone, which ensuring that adverse effects of any activity are internalised within the site where the activity occurs; and 4. other than provided for above, non-residential activities, including retail, commercial and industrial activities that would diminish the amenity values and the quality and character of the zone.	1. enable residential activities at current scale to continue and enable further development at a scale that is consistent with the rest of Mandeville village. 2. Agricultural activities can continue as effects are already internal to the San Dona sites. 3. No community or commercial activities are anticipated by the consequence of rezoning to allow limited additional residential density. 4. Non-residential activities are not anticipated as a consequence of LLR zoning. San Dona is and can continue to be consistent with this policy if rezoned LLRZ.	
LLRZ-P3 Reverse Sensitivity	San Dona Assessment (LLRZ)	Submission point
Minimise reverse sensitivity effects within the Large Lot Residential Zone or on an existing activity in an adjacent zone by: 1. requiring new activities minimise the potential for reverse sensitivity effects to occur on activities anticipated in the zone; and 2. requiring separation distances between new activities in the Large Lot Residential Zone and existing activities in adjacent zones.	The majority of Mandeville has now been identified as an urban area. The rezoning of San Dona from Rural to LLRZ will: 1. Cause no difference in relation to reverse sensitivity effects as San Dona in regard to surrounding land uses that are rural or rural lifestyle in nature. 2. Be able to achieve separation distances anticipated in the LLR zone. San Dona is and can continue to be consistent with this policy if rezoned RLL.	No proposed change requested to policy LLRZ-P3. Support Policy LLRZ-P3.

LLRZ-P4 Amenity Values	San Dona Assessment (LLRZ)	Submission point
Maintain amenity values within the Large Lot Residential Zone through: 1. low levels of noise, outdoor lighting, signs, dust, odour and traffic; and 2. limiting kerb, channel and street lighting compared to other Residential Zones.	The majority of Mandeville has now been identified as an urban area. The rezoning of San Dona from Rural to LLRZ will acknowledge that: 1. San Dona already has low levels of noise, limited outdoor street lighting, traffic signage only, and low levels of dust, odour and traffic; 2. San Dona does not have kerb, channel or footpaths similar to the rest of Mandeville Village. There are only street lights at corners or intersections (not residential street lighting). As such San Dona is already <u>highly consistent</u> with this policy and this can continue in relation to any infill potential under LLR zoning.	No proposed change requested to policy LLRZ-P4. Support Policy LLRZ-P4.
LLRZ-P5 Large Lot Residential Zone Overlay	San Dona Assessment (LLRZ)	Submission point
For any Large Lot Residential Zone Overlay, ensure an ODP is developed in accordance with SUB-P6 and incorporated into the District Plan.	San Dona does not request (or require) a Large Lot Residential Overlay as it is an existing development proposing infill development rather than new greenfield LLRZ development. An ODP is appropriate in the instance where Greenfield development is proposed only. As such this policy is not relevant to San Dona.	No proposed change requested to policy LLRZ-P5 on the basis that it would not apply to San Dona. Support Policy LLRZ-P5.
Rule Assessment (Large Lot Residential Zone)	San Dona Assessment (LLRZ)	Submission point
LLRZ R1 Construction or alteration of or addition to any building or other structure To LLRZ- R44 Trade Supplier	All permitted, restricted discretionary, discretionary and non-complying rules are supported as they are appropriate methods to	No proposed changes are requested to Rules LLRZ-R1 to LLRZ-R44 inclusive. Support proposed rules in their entirety.

	achieve the LLRZ objective and policies assessed above when applied to the San Dona situation.	
Built Form Standards (Large Lot Residential Zone)	San Dona Assessment (LLRZ)	Submission point
LLRZ-BFS1 Site density To LLRZ-BFS6 Building and structure setbacks	Built form standards are supported as they are appropriate methods to achieve the LLRZ objective and policies assessed above when applied to the San Dona situation.	No proposed changes are requested to Rules LLRZ-BFS1 to LLRZ-BFS6 inclusive. Support proposed rules in their entirety.
LLRZ-BFS7 Fencing	San Dona Assessment (LLRZ)	Submission point
1. Any fencing located on or within 15m from any road boundary shall: a. be no higher than 1.2m above ground level; and b. be a farm-style post and wire or post and rail fence; and c. achieve a minimum of 40% visual permeability as depicted in Figure LLRZ-2. 2. Any fencing located on or within 10m of an internal boundary shall: a. be no higher than 1.8m above ground level; and b. be a farm-style post and wire or post and rail fence; and c. achieve a minimum of 40% visual permeability as depicted in Figure LLRZ-2. 3. Any fencing located outside the areas specified in (1) and (2) above shall:	Much of San Dona (and the rest of the original parts of Mandeville village) has vegetation on boundaries (shelterbelts and hedging) which are typically in conjunction with rural post and wire types of fencing. It is likely that existing hedging would be retained at the time of infill development to maintain existing character, and therefore the rule needs to avoid inadvertently specifying fencing be provided or removal of existing established hedging and vegetation, that would adversely change the character of existing development. For this reason, the rule should apply to <u>new</u> fencing only. The purpose of the rule appears to try to ensure that residential 'urban' paling fencing is avoided, but the proposed rule does not take account of existing boundary options such as hedging. The visual permeability required by Figure LLRZ – 2 does not make sense in the LLRZ zone, as the same diagram is used in other residential zones	Oppose built form standard LLRZ-BFS7 as proposed and request changes to the standard as shown below: 1. Any <u>new</u> fencing located on or within 15m from any road boundary shall: a. be no higher than 1.2m above ground level; and b. be a farm-style post and wire or post and rail fence; ~~and~~ ~~c. achieve a minimum of 40% visual permeability as depicted in Figure LLRZ-2.~~ 2. Any <u>new</u> fencing located on or within 10m of an internal boundary shall: a. be no higher than 1.8m above ground level; and b. be a farm-style post and wire or post and rail fence; ~~and~~ ~~c. achieve a minimum of 40% visual permeability as depicted in Figure LLRZ-2.~~

a. be a farm-style post and wire or post and rail fence; or b. have a maximum height above ground level of 1.8m and c. be not more than 30m along any length of the fence.	(for general residential, medium density and settlement zones) in the District Plan. Notwithstanding this, the diagram does not even depict the type of fencing required by the rest of the rule (post and wire or post and rail) and therefore Figure LLRZ-2 and any reference to it should be removed. That is, unless it is intended solely for Greenfield LLRZ development (in an overlay). The restriction of the 30m length of other internal site fencing is unnecessary given other permitted rules for the zone allow land use effects to be internalised within the site. On any large site (ie at a minimum area of 5000m²) internal fencing should not be prescribed so as not to limit the ability to undertake the activities identified in LLRZ-R1 to LLRZ-R44 in the zone.	~~3. Any fencing located outside the areas specified in (1) and (2) above shall:~~ ~~a. be a farm-style post and wire or post and rail fence; or~~ ~~b. have a maximum height above ground level of 1.8m and~~ ~~c. be not more than 30m along any length of the fence.~~
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