Waimakariri District Council - Proposed District Plan

Form 6 Further submission in support of, or in opposition to, submission on notified proposed policy statement or plan, change or variation

Clause 8 of Schedule 1, Resource Management Act 1991

To: Waimakariri District Council
Date received: 21/11/2022
Further Submission Reference Number #4

This is a further submission in support of (or in opposition to) a submission on a change proposed to the following proposed plan (the **proposal**): Waimakariri District Council - Proposed District Plan

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Attachments
Further submission on 236-SUBMISSION-R[redacted]-ALLAWAY-AND-L[redacted]-LARSEN-ASTON-CONSULTANTS.pdf
Further submission on 236-SUBMISSION-R[redacted]-ALLAWAY-AND-L[redacted]-LARSEN-ASTON-CONSULTANTS (1).pdf

I am:

- a person representing a relevant aspect of the public interest. **False**
- a person who has an interest in the proposal that is greater than the interest the general public has. **True**
- the local authority for the relevant area. **False**

Reason for category chosen:

I work for a local surveying, planning and engineering consultancy and have paid very close attention to the development and expansion of Rangiora for many years.

Further Submission points

I **Support** the original submission of:
Aston Consultants Ltd - Fiona Aston, PO Box 1435 Christchurch 8140

Original Submission

Summary Reasons for the Submission

The reasons for our submission are outlined below.
a) The preferred relief (**the proposed rezoning**) is both appropriate and necessary to achieve sustainable growth and development of Rangiora and the District and meet the requirements of the National Policy Statement for Urban Development

This further submission is in relation to the original submission of:
236-SUBMISSION-RICK-ALLAWAY-AND-LIONEL-LARSEN-ASTON-CONSULTANTS

1. **The particular parts of the original submission I support /oppose are:**

The whole of the submission in its entirety.

2. **My position on the original submission is:**

I fully support the position.

3. **The reasons for my support to the original submission are:**

3.1 I fully support policy SUB-P5 Density in Residential Zones. *"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."*

3.2 I fully support objective RESZ-O5 Housing choice *"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."*

3.3 I noted in my earlier submission 240-SUBMISSION-MALCOLM-DARTNALL that the conditions of policy SUB-P5 Density in Residential Zones. *"Provide for a variety of site sizes"* and objective RESZ-O5 Housing choice cannot be met under the proposed conditions of Proposed District Plan. This is discussed in detail in that submission.

3.4 The submission of RICK-ALLAWAY-AND-LIONEL-LARSEN-ASTON-CONSULTANTS provides a clear pathway for the development for *"a variety of site sizes within Residential Zones"* and "*1) a range of residential unit types; and 2) a variety of residential unit densities."*

4. **Allow or disallow the original submission (in full or in part)**

I submit that the council allow the submission in full.

5. **Give precise details of why you wish to allow/disallow (in full or in part) to indicate the decision you want Council to make**

5.1 Under the current provisions of the Proposed District Plan it is not possible to comply with policy SUB-P5 Density in Residential Zones or achieve objective RESZ-O5 Housing choice.

5.2 The submission of RICK-ALLAWAY-AND-LIONEL-LARSEN-ASTON-CONSULTANTS provides a clear path to provide for a variety of lot sizes and range of housing types within the residential zones of Rangiora.

5.3 The submission provides an opportunity for the council to comply with its own proposed policy and met its own proposed objective.

5.4 I submit the council allow 236-SUBMISSION-RICK-ALLAWAY-AND-LIONEL-LARSEN-ASTON-CONSULTANTS in full.

2020 (**NPS-UD**).

b) The Site identified in Figure 1 and at para 1 of the Preferred Relief above is a logical and preferred location that lends itself to a specific type of housing development not provided within the PWDP as a residential option adjoining but outside the existing urban areas. Nowhere is it possible to develop in a comprehensive, coordinated way a low density, high quality residential environment in the District's towns, the Rural Lifestyle Zone or Settlement Zone as a permitted activity.

c) The requirement for 12/15 hh/ha in GRZ zones (the majority of land in urban areas) drives development to modern scale relatively small urban lots best produced as a package across a significant land holding. The GRZ subdivision standards do not provide for the needs of people who seek a generous sized urban lot residential setting. This is a housing sector that is running against the planning tide of intensification but is, nonetheless, a legitimate form of housing in an appropriate setting. The barriers to such development in urban areas requires an appropriate setting/ location in the rural areas but close to or adjoining the urban areas and at a much lower density than is desired or appropriate (the PWDP LLRZ) to meet the housing needs for generous sized urban lot residential living..

d) The PWDP subdivision standards for LLRZ require lots that are very large for those whose primary interest in a rural setting is a form of residential living, not one that requires significant maintenance and management often involving animals or machinery at scale. Conversely, the GRZ subdivision standards do not provide for the needs of people who seek a large lot residential setting

e) The focus in the PWDP is on prescribing a limited range of residential options and tightly controlling and constraining housing choice within those options. Further urban growth is also tightly constrained and controlled around DEV areas around Rangiora and Kaiapoi but for a very specific form of residential development driven off density requirements that do not match the needs of all landowners.

f) The focus in most new District Plans, driven in part by the National Planning standards, is to simplify the range of zones, to standardize lot sizes, to supposedly create efficiency and certainty through ease of administration of the District Plans. This is done by constraining housing and land development choices by lot size, by location, by built standards and the disposition of built/open elements in a site. However, the National Planning standards do provide for large lot urban residential living, a residential living option which has not been taken up the PWDP (due most likely to the restrictive provisions of the CRPS which only prescribe one from of lower density residential living, at a density of 1-2 hh/ha).

g) This planning approach may be a standard approach to resource allocation but it does not provide a flexible, responsive approach to innovative and new development options. The Government is creating policy settings that on one hand seek intensification in urban areas, while at the same time pushing away from a land allocation model of planning. The PWDP in striving to face both policy directions has a package of measures that are in fact a major barrier in terms or cost, timeframes and certainties for proposals that are not cut from the suite of housing and development options set out by the PWDP. The allocation of land in preferred development areas, it must be said, runs counter to the Government's push, and now its direction, to free up land for development, to encourage innovation in housing (presently with a focus of intensification) and to make available a range of responses to the need to meet the housing needs of people and communities set out in the NPS-UD.

h) While the weight of demand (and the planning response) is around affordable housing, around small lots and dense development that supports investment in public facilities and amenities such as public and active transport, reserves, and commercial services, there is always a wide spectrum of preferences at play in the housing market. The demand for high quality, generous houses set on generous sized parcels of land within high amenity settings is an important and no less relevant housing sector. There is a strong unmet demand, as confirmed by advice from Bayleys real estate (**Appendix 5**) for larger family homes with room for a pool or similar. Purchasers want to be close the amenities of Rangiora and within walking and cycling distance of local schools. They do not want the only available options – a 4 ha lifestyle block or 5000m^2 rural residential site at Mandeville or Ohoka.

i) Interestingly enough for a nation built on the so-called quarter acre paradise, recent policy and planning interest in housing and land development has now seemingly positioned the 1011m^2 section as a luxury item, as the antithesis of providing for community well-being and needs. It is as though the old quarter acre of itself acts against building a sense of community despite being able to be developed in a planned, structured, coordinated or integrated manner. Rather than being a frivolous discretionary item in land development

and housing choice, a well-planned, well located and properly serviced low density residential environment has much to offer urban environments. They can be tactically used to provide shape and edge to urban areas, they can provide a mass of amenity different from (and potentially complementary to), but no less legitimate in urban outcome terms, to conventional GRZ zoned land.

j) In many ways the approach of a district plan to the role and place of the old quarter acre is not dissimilar to the issues faced by comprehensive retirement villages when first proposed. The idea of dense, almost gated and self-contained communities, with multi storey buildings also did not sit well in many district plans. But now they are accepted as an important part of the urban fabric catering to a specific demographic and health demographic. Most plans enable them.

k) Provision for low density residential in an urban setting, or failing that likelihood, in an adjoining rural zone is a fundamental gap in the district plan.

l) The submission seeks to provide for another housing typology not provided in the PWDP and in a location with significant planning merit. The planning case was made out in a detailed submission to the proposed Rural Residential Strategy (**RRS**) for the land identified in this submission to be "reserved" for conventional Rural Residential zoning in the review of the District Plan.

That submission was rejected in favour of a decision ascribing an unspecific strategic significance to Lehmans Road as the urban boundary; simply the decision was that rural residential development here would preclude this area as a future urban growth path, even though this was likely to be very long term as the Waimakariri District Development Strategy (WDDS 2018) for the period up to 2048, does not favour urban growth west of Lehmans Road.
Officer Recommendation
Continue to exclude the area west of Lehmans Road and the racecourse land at Rangiora as growth areas as these were originally considered but not included in the draft RRDS as they trigger the key preliminary criteria of: being on the direct edges of a main town outside of the Projected Infrastructure Boundary (PIB) thereby foreclosing more intensive long-term urban development, and…

Panel Recommendation
The panel accepted the officer recommendations to exclude areas on the fringes of Rangiora in the final RRDS due to these having the potential to foreclose more intensive long-term urban development of the town.

m) In light of the above decision on the Waimakariri Rural Residential Strategy, the proposal now is for a form of high amenity low density urban zoning, which whilst in demand is entirely absent from the PWDP. This will be a long term urban form of development. The proposal set out in the submission will achieve a compact, and efficient, urban form on the edge of Rangiora with excellent connectivity by multiple transport modes. It provides for continuous urban development by enabling a built form which can act as a strong zone or urban boundary.

n) The proposed rezoning will accommodate approximately 311 LLRZ lots1 at the proposed amended density standards for LLRZ D2 (average size 1500m^2). It will contribute to a well-functioning urban environment, meeting the NPS-UD Objective 6(c).
o) Any adverse effects on the environment arising from the proposed rezoning will be minimal, if any, and can be adequately mitigated. A high amenity master planned development is proposed.
p) Significant positive effects arise from the proposed rezoning. It will enable the short term housing demand at Rangiora to be met, and can deliver a housing typology for which there is demand, on lots that are not a burden to the landowners (which is the case for 4ha and the very limited areas of LLRZ D1 with a density of 1-2 hh/ha) and for which there is no provision in the PWDP. At present rates of land uptake there is about 4 years vacant land supply in Rangiora. Given it takes 3-5 years to bring land from zoned state to on the market as developed lots, there is some urgency in providing additional capacity. This proposal helps address an anticipated shortfall in residential zoned plan enabled land.
q) There is no additional cost to the Council in re-zoning the Site as there is expected to be capacity in the public utilities and the existing road network, including planned upgrades.
r) Amendments to PWDP objectives and policies may be necessary to provide for a higher density LLRZ, but of themselves will not act against those relating to Strategic Directions Urban Form and Development and Urban Growth. The PWDP approach to zones and
identification of future development land is already out of step with higher order Resource Management Act 1991 (RMA) statutory documents because they do not give effect to the NPS-UD (and are sought to be amended through this submission).
s) The alternatives of retaining Rural Lifestyle or Large Lot Residential zone across the entire Site are not an efficient use of land which immediately adjoins the urban area of Rangiora, and is highly accessible to the town centre by active transport modes as well as car.
t) The proposed rezoning is consistent with and the most appropriate, efficient and effective means of achieving the purpose of the RMA.

The Site
1. The Site is a 58ha block of land ('the Site') accessed from Lehman Road, Rangiora **(Figure 1)**. It is owned by the two submitters and 12 other landowners.

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1 Assumes 20% of land area taken for servicing including roading, reserves and stormwater management if required.

Figure 1: The site (outlined in blue (Google Earth)

2. The Site is surrounded by RLZ land that is used for a mix of lifestyle and conventional farming. To the NE is the Rangiora Eco Holiday Park, and beyond the Park is the Rangiora Racecourse about 300m away from the nearest lot and 1km from the centre of the Site. Land to the south east is GRZ and part of urban Rangiora with newly developing residential land west of West Belt. About 1.9 km to the NW is Rangiora Airfield. About 1km north of the most northern lot is the Ashley River.
3. The southern-most lot in the proposal with the Rangiora Vet Clinic faces, but does not have access to Rangiora-Oxford Road (State Highway 72). This arterial road provides the main road connection in to the centre of the town. The well-established Fernside Rural residential area is about 2.5km west from the junction of Lehmans and Rangiora-Oxford Roads.

Figure 2: the site is a broader context (Site marked red)

4. The Site is not identified as lying within a preferred growth direction for Rangiora in the Waimakariri 2048 District Development Strategy (2018) (**WDDS**) **(Figure 3)**. No land west of Lehmans Road is included in the West Rangiora Development Area (**DEV-WR**) in the PWDP.

Figure 3: Figure 11 WDDS

5. The Council reviewed its strategic approach to the location and provision of Rural Residential land (now zoned LLRZ in the PWDP) in the WDSS. It adopted the position that it would:

a) Explore tools such as cluster development to manage rural character

b) For rural residential development, adopt an approach that has a primary focus on creating new rural residential areas, with a secondary focus on enabling large lot intensification within existing rural residential areas where there is sufficient community support and servicing available

c) Review the Rural Residential Development Plan for the whole District (pg 21 WDDS).

6. Rangiora presently has a population of 17,841 (2018 Census). It grew steadily between 2006 and 2018. Growth of Rangiora since then has continued in step with the district growth which has increased 8.2% between 2018 and 2021 from 61,300 to 66,300 at an annual average of 2.8% from 2018 to 2020 (Statistics NZ Subnational population projections at 30 June 2021: provisional).

2006 (count)	2013 (count)	2018 (count)
12,165	15,069	17,841

Statistics NZ

Population projections at 30 June

PLANNING STATUS OF THE SITE

Chapter 6 of the Canterbury Regional Policy Statement

7. An assessment of the CRPS is set out in **Appendix 1** to this submission.
8. The Site is within the Greater Christchurch area.
9. It was not shown as a Greenfield Priority Area – Residential (GPA) on Map A of the Canterbury Regional Policy Statement (CRPS). The GPA terminates at Lehmans Road.
10. As a result of the Minister for the Environment's decision of 28 May 2021 on Change 1 to Chapter 6, an area largely south of Oxford Road and a finger of land to the north of Oxford Road was included as a Future Development Area (**FDA**) (**Figure 4** orange).

Figure 4: Map A Chapter 6 Regional Policy Statement Greenfield Priority areas
Site location identified with red circle (appx)

11. The FDAs are intended to accommodate the increased demand for new dwellings in that part of Waimakariri District within the Greater Christchurch Urban Area and to respond to the NPS-UD. They do not provide "plan enabled" land as they need to negotiate a rezoning process to confirm their status as land developable for housing and other urban purposes.
12. The proposal for a LLRZ zone with average lot sizes of 1500m2 is inconsistent with the policy approach of Chapter 6 for Greater Christchurch, in that if fits none of the residential living typologies provided for in Chapter 6 and is not in a location identified for urban or rural residential development. It sits 'between' the urban and rural residential densities provided for in the CRPS (minimum 10 hh/ha for urban in Waimakariri, and average 1-2 hh/ha for rural residential). The proposed density is appx. 6.66 hh/ha.
13. Notwithstanding, the proposal meets all the location and other criteria in CRPS Policy 6.3.9 for rural residential development. It is:

- Outside the CIAL noise contours
- Has some sites with restrictions from the take-off and landing vectors for Rangiora Airfield but not such as to impact its operational capacity.
- Is outside the groundwater protection zone
- Is not within the Waimakariri stop bank system
- Has no views of or to the Port Hills
- Has good access for emergency services
- Will not create reverse sensitivity issues with adjoining land uses; Rangiora Racecourse is 500m away.
- Free of significant natural hazards and is a flat site.
- Supports no significant natural values or ecological values.
- Contains no SASMs.
- Can be integrated into or consolidated with the existing urban area of west Rangiora.
- Contains no surface water bodies so there will be no adverse impacts on these.
- The development will be contingent on an ODP to provide integrated design for subdivision and land use, and provide for the long-term maintenance of a high quality high density rural residential character.
- The proposal is not intended as a staged development towards full urban; rather it is intended to provide a unique residential environment that can stand alone and contribute to the urban fabric of Rangiora like Palmview in east Rangiora, or as Kaiapoi Lakes does for Kaiapoi.

14. Overall, the proposal is not consistent with Chapter 6 but that is more a function of its original purpose when formulated in 2013. Notwithstanding that, the submission for a lower density residential focussed, high quality urban environment that attaches to an existing urban area and that promotes a coordinated pattern of development has planning merit.

Operative Waimakariri District Plan
15. The Site is zoned Rural in the Operative Plan. The minimum lot size for subdivision and a dwelling is 4 ha.
Proposed Waimakariri District Plan
16. The Site is zoned Rural Lifestyle Zone **(LRZ) (Figure 4).** The minimum lot size for subdivision and a dwelling in the LRZ is 4 ha.
17. Oxford Road is a strategic road and Lehmans Road is a collector road.

Figure 5: Proposed District Plan Zoning (site outlined in red)

18. The Site is also subject to, or potentially influenced by, a number of Overlays:
    a) Rangiora Airfield Take Off Climb and Approach Obstacle Limitation Surface (**Figure 6**)
    b) National Grid Transmission Lines (**Figure 6**)
    c) Liquefaction: Liquefaction damage is unlikely (**Figure 6**)
    d) Non-Urban Flood Assessment Area (**Figure 7**)
    e) Geographic areas: Ecological Area – Plains

f) Ecological District – Low Plains

Figure 6: Rangiora Airfield Take-off and Approach vectors (blue dashed lines); Liquefaction damage unlikely (green)Transmission lines (green lines); Site outlined in red

Figure 7: Non-urban flood assessment & Waimakariri Flood Hazard maps
Blue – medium risk, green – low risk, white – very low

DEVELOPMENT PROPOSAL AND PROPOSED REZONING

19. Subdivision of the Site will create approximately 311 LLRZ D2 lots.
20. The key design drivers for the proposal are:

a) A high amenity premier residential zone with large houses on large sites – average 1500m^2, min 1000m$_2$ based on the St Kilda, Hamilton development concept (**Figure 8**).

b) LLRZ D2 standards would enable a lower density zone in the medium term e.g. 10 years to achieve a high quality consistent character subdivision. If developed as an integrated development subject to an ODP subdivision can be staged for to the proposal.

c) Creating strong connections with the immediate neighbourhood by providing a cohesive interconnected roading layout that picks up direct links to the eastern neighbourhood off Lehmans Road and the northern subdivision roading, and carries them into the Site.

d) Creating a high amenity and diverse residential neighbourhood by providing interfaces to roads, reserves and rural environments.

e) Respecting and building on local identity and character of Rangiora by retaining specific vegetation features from the Site, and anchoring the development into the wider landscape.

21. A development concept can provide for sound urban design by:

a) A hierarchy of movement corridors.

b) Prioritisation of walking and cycling.

c) A north-south alignment of street blocks to maximize solar access and provide for efficient use of lots.

d) Block perimeters being kept as small as practicable to aid permeability and higher public amenity.

e) Enabling a range of housing typologies set in high quality landscape and street setting with generous amenity plantings and curtilage.

Figure 8: St Kilda development images (Bayleys)

22. St Kilda, Cambridge is a premier development on the outskirts of Cambridge, centrally located and with easy access to the Waikato Expressway. It was originally part of a small dairy operation which was dissected by the Waikato Expressway, leaving a portion within the Cambridge Town boundary and the larger balance of the property of approximately 80 ha (which became St Kilda) on the Eastern side of the Expressway, left in the Rural Zone.
23. The initial development concepts were for a Rural Residential type development given the Expressway separation of the existing residential development on the Western side of the Cambridge Bypass, however this was not supported by Council and a new concept of larger residential sections of a 1600m² average size was developed and approved – see https://www.stkilda.nz/page/location/

EFFECTS ON THE ENVIRONMENT

Township growth and urban form

24. The Site immediately adjoins the western edge of urban Rangiora.
25. The WDDS indicated a general preference for the direction of urban growth of Rangiora to the east as a way of balancing up the residential areas around the town centre and some growth to the west.
26. The approach of the WDDS was to signal growth options to be confirmed in the District Plan Review:

The broad directions for greenfield residential growth for the District's main towns are set out in Figures 11 to 14. Further work will be carried out to identify and confirm the exact locations and extent of these residential growth areas, together with the intensification opportunities within existing urban areas. These will be enabled through the District Plan Review and other planning tools.

27. The Strategic Planning documents clearly signal active consideration of growth needs and growth directions. The options available to the Council were constrained by the approach of the CRPS as the District Plan has to give effect to the CRPS and cannot be
inconsistent with it. The CRPS took effect in 2013 and is overdue for review.
28. The CRPS tightly holds urban growth to the constraints of Map A Chapter 6 and the identified FDAs which although amended by Plan Change 1 in 2020 does not respond to the directions of the NPS-UD. In any event the approach is focused on the need for housing in full urban residential land, less on other residential development forms.
29. As such the Site falls outside the planning policy framework for urban growth. However, in terms of urban form and on the ground, there is considerable merit and logic to conversion of this existing LRZ land to a new high amenity residential form that can be integrated into the Rangiora urban fabric.
30. The proposal has the potential to anticipate the longer term growth path confirmed by the decisions on the RRS to protect the future growth option of more intensive urban development in this direction. It can set a pathway to further westward expansion on land
that holds few if any physical barriers to land development.
31. The proposal will contribute to the housing needs of Rangiora and in a form and location that does not undermine the long run urban form of Rangiora. Planned growth confirmed in the PWDP is already intended to extend westwards out to Lehmans Road and to keep the town edge squared up providing depth to future development and providing a rational basis for providing movement networks driven off the key roads such as Rangiora-Oxford Roads. The West Rangiora Future Development Area confirms this approach. The Site sits in the next block west of Lehmans Road so is not proposing a disjointed urban form, nor one that is not part of the long term thinking of urban form and growth for Rangiora.

32. A full residential zoning is proposed under LLRZ D2 and will provide a high quality street character, overall amenity and passive surveillance over the street, and will create the correct lighting standards, roading standard, fully formed footpaths and cycleways required for a high quality urban environment.

Neighbourhood and wider community effects
33. The Site is serviced by a collector road and is close to an arterial road. This provides for ease of access and safe and convenient movement to and from the Site. A planned development co-ordinated by an ODP can facilitate within the site movement corridors and linkages through the Site to provide for walking and cycling.
34. A key positive neighbourhood and community effect will arise from the existing dwellings and their established gardens and plantings that will anchor new development and provide a point of reference for new dwellings. Development will not be on a bare site; it will take place in an existing established part-residential setting. The transition to a low density, high quality premier residential development will start from a favourable position and minimise the apparent extent and nature of the landscape change.
35. The Site is comparatively large (58.4 ha) and has the potential to support a variety of residential building typologies and this will contribute to a mix of households within the development and provide built form variety and interest in the streetscape. Whilst LLR D2 standards are proposed, it may be that part of the Site is suitable for other higher density forms of development, which would be within scope of the alternative relief, and could be considered as part of the master planning process required for preparation of an ODP (ahead of the hearing). The earlier stages of the St Kilda development were for large lot residential, with more clusters of townhouses included as later stages (and a retirement village). A retirement village is unlikely in this case, given the proximity of the Charles Upham Retirement Village.
36. Rangiora is well-positioned to accommodate and service the needs of a fast-growing resident population that will in turn support more business activity, schools, community facilities and community organisations.

Effects on tangata whenua values
37. The Proposed District Plan does not identify any Sites and Areas of Significance to Maori in the Site, but the nearby Rakahuri/Ashely River identified as SASM-025. This has been scheduled as being
River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species
38. The PWDP has Policy SASM-P8 which is relevant to pre-development processes:
Engagement with rūnanga
Te Ngāi Tūāhuriri Rūnanga and the District Council to encourage engagement with the Rūnanga priorto persons undertaking activities and/or applying for resource consent where the activity has thepotential to adversely affect identified sites or areas of Ngāi Tūāhuriri cultural significance. Where priorengagement with Te Ngāi Tūāhuriri Rūnanga h as not been undertaken by an applicant for an activitythat has the potential to adversely affect an identified site, the District Council will consult with the Rūnanga.
39. The Site is not listed as an archaeological site on the NZ Archaeological Site database.

Landscape and visual effects
40. Rural Lifestyle style development exists on the Site now (a series of 4 ha lots with a dwelling and associated accessory buildings on each). The landscape is dominated by shelter belts, utility buildings, significant trees and planted curtilages around

dwellings many of which are well set back off the roads down RoWs.
41. An ODP will help to achieve an integrated, cohesive and coherent development The proposal will lead to a modification of the landscape of the Site from a predominantly lifestyle block landscape to a denser semi-urban environment dominated by residential building that will, in time, get the benefit of street tree and reserve plantings and landscape treatments around the houses.
42. The visual effects which will arise from a change in the number of vegetative and built elements in the landscape are significant, but not avoidable, if the Site is to contribute to the on-going growth of Rangiora. The change will contribute to a high quality amenity and quality of environment and one that will be entirely consistent with and supportive of the rural lifestyle residential development that has successfully established on the Site.

Well-functioning urban environments
43. The Site adjoins the existing built up urban area of Rangiora. Immediately to the east are existing or developing residential areas.
44. The conversion of the Site from present rural lifestyle uses to low density, high quality residential will continue a pattern of outward expansion of Rangiora. Such a change may not be consistent with the PWDP's identification of a Future Development Overlay for west Rangiora only as far west as Lehmans Road, but on the ground it will look and integrate as part of the urban fabric.
45. It will provide some replacement lower density living areas for the existing LLR zones at north west Rangiora – but at much more appropriate higher density that the LLR D1 standard which is 1-2 hh/ha. There are two such areas, shown on the planning maps below. River Road has an 'urban overlay' and is intended to be intensified to urban densities. The land on the opposite (east) side of Lehmans Road is a 'legacy' rural residential zoning which applies under the Operative District Plan. The landowners have developed the adjoining residential subdivision and wish to develop the land for full urban residential development. Services are in place to support this. The constraint to date has been Map A of the CRPS which does not include the land as a Greenfield Priority Area or Future Development Area, GR zoning of this land is consistent with the NPS-UD.

Figure 9: PWDP as notified – LLRZs shown in light grey. Diagonal stripes – urban growth overlay.
Site outlined in red.
46. Rangiora is growing apace. It is attracting significant interest from new home buyers as people respond to the significant investment in upgraded transport links (Northern Corridor and public transport) and a growing economic base for employment within the District and the City.
47. Rangiora has excellent connectivity to the City, both via the new Northern Corridor, and a nascent cycleway link into the City. There is a very regular bus service every half hour.(the No 1 Blue Line) The standard trip takes 70 minutes, and there is a twice daily weekday morning express service from Rangiora, and seven times weekday express out to Rangiora all via Kaiapoi.
48. The Site will step out the western edge of Rangiora, but as it exists in a peri-urban form now, such a change does not alter how the Site interacts with Rangiora as a whole. It is in many ways a functional part of urban Rangiora now; it's only the Zone boundaries and policy framework that create the sense of it not being part of Rangiora.
49. The Site is convenient to the Rakihura/ Ashley recreation trails, the racecourse, Arlington Park, and the airfield. The town centre is easily accessible.
50. The following assessment of the criteria in the NPS-UD for determining a well-functioning urban environment shows that the proposed rezoning will deliver urban, housing and residential outcomes that meet those criteria. There will be a variety of homes enabled by generous lot sizes. The Site is well-positioned, building as it does on an existing township well-serviced by public transport and cycling options, to provide good accessibility to jobs, community services, and open spaces, as well as mitigating climate change impacts and future natural hazards by being not near the coast and well removed from major rivers.

NPS-UD Policy 1	
Planning decisions contribute to well functioning urban environments, which are urban environments that, as a minimum:	**Assessment**
	The proposal is to have larger lots supporting predominantly standalone dwellings and associated accessory buildings (including

(a) have or enable a variety of homes that: (i) meet the needs, in terms of type, price, and location, of different households; and (ii) enable Māori to express their cultural traditions and norms;	generous sized garaging) in an open landscaped garden setting. This will fill a gap in the range of housing typologies available at Rangiora and contribute to a better functioning urban environment overall at Rangiora. It is not necessary for each individual rezoning proposal to have a wide range of housing typologies, and in some circumstances this may not be appropriate. The rezoning will deliver a premier high amenity urban subdivision with generous sized lots which will complement existing and planned higher density residential development at west Rangiora. There is scope with the relief sought for a mix of residential densities. The appropriateness of this can be considered at the master planning/ODP stage. The Site has the potential to create a unique urban environment in Rangiora. It can follow the example of Palmview based on a lake or Kaiapoi Likes providing a niche housing option in Rangiora and the District meeting a need for residential land not constrained to GRZ standards.
(b) N/A business sectors	
(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and	The Site has access to a collector road and a strategic road providing easy access to key community amenities and facilities. The town is served by a public bus route to the city, and a cycle trail connecting to Kaiapoi and the City. The new West Rangiora Development Area adjoins the Site to the south. The Site will become closer to Rangiora public transport routes as they extend out to service this new growth area over time. The Site is in walking distance to Arlington Park and the Rakahuri/Ashley which contains abundant recreations pace. It is easily accessible to the town centre and within walking distance to the Huntingdon Drive local centre.
(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and	The demand for housing and land in Rangiora is largely ahead of the planning means to respond. This proposal will “top up” the land presently set aside in the PWDP and provide a useful buffer to demand. The Site owners have been keen to release this land for more intense development for some time; there is no prospect of land banking.
(e) support reductions in greenhouse gas emissions; and	The Site has significant advantages in being easily accessible to the town centre and reserves, community facilities and schools. The proposal retains a consolidated form to Rangiora with good connectivity and linkages to recreation space and commercial centres reducing the need for car travel.
(f) are resilient to the likely current and future effects of climate change	The Site is within the area of influence of a major river but the non-urban flood assessment maps do not show extensive flooding likely at the Site. Being inland it is not at risk from climate change induced extreme natural hazard events like sea level rise. or river flooding.

Effects on ecosystems and habitats

51. The Site is currently used for a mix of low intensity (grazing) farming, and lifestyle purposes. Shelter belts and utility buildings have been established

52. The Site has been identified in the PWDP with two ecological overlays (the PWDP ecological overlay – Plains and Low Plains Ecological District). They are a district-wide overlays and no specific ecological values have been identified in the Proposed Waimakariri District Plan. These overlays seek primarily to retain indigenous vegetation. The PWDP identifies SASM 025 nearby the Site. That is a Site and Area of Significance to Maori and in SASM - Schedule 1 is identified as *being River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species.*

Effects on natural and physical resources

53. The Site drains in a SE direction towards the newly developing residential area.

54. There will be a degree of site disturbance as part of creating the roading network, and reserves, and as part of curtilage development on each lot.

55. The proposed use for residential activity inevitably leads to loss of some rural productive potential as land owner intentions are not about farming or productive use of the land, but lifestyle use and enjoyment. Built forms and hard surfaces become more dominant.
56. The Site comprises 4ha bocks now and these are not able to be used effectively for productive purposes other than for intensive productions based on tunnel housing and other supported production systems. None exist in the Site now.
57. The Site contains Class 2 and Class 3 soils as defined in the NZ Land Use Inventory (Landcare Research) Land Use Capability classes 1-3 **(Figure 10)**. Productive use of these soils other than for low level purposes i.e. grazing, is not feasible given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production).

Figure 10: Site soils: Site outlined in red; (Canterbury Maps)
Class 2 soils: bright green/Class 3 soils: light green;

Discharges of contaminants into the environment
58. There will be no discharges of contaminants into the environment. Wastewater will discharge to the Council's reticulated system.
59. Stormwater discharges will potentially be to ground given ground conditions or to an approved and consented stormwater management and treatment area which will meet all relevant Council standards.

Risks from natural hazards or hazardous installations
60. The PWDP planning maps show the Site as being within a Non-Urban Flood Assessment Area.
61. The District Plan maps do not identify high flood hazard areas or high coastal flood hazard areas, rather these are identified through the flood assessment certification process. This enables the most up-to-date technical information to be used. However, as a guide, areas that are potentially high hazard can be identified through the Waimakariri District Natural Hazards Interactive Viewer (NH - Introduction).

62. Rules that refer to a Flood Assessment Certificate require a certificate to be obtained from the District Council to determine compliance with the relevant rule. The alternative is to apply for resource consent as set out in the rule.

63. Rule NH-R2 states

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;

64. Assessment of flood risk and consequence can be undertaken at subdivision stage.
65. There will be no hazardous installations proposed on the Site.

Geotechnical assessment
66. The PWDP planning maps show the Site as being "Liquefaction damage is unlikely. Standard investigation procedure outlined in NZS3604 is appropriate".

Contaminated land
67. A Preliminary Site Investigation can be carried out for the Site at subdivision stage.
68. An enquiry of ECAN has identified that two sites at the northern end of the Site potentially contain some contaminated land, which can be investigated further at subdivision stage **(Appendix 6)**. 315 Lehmans Road is an unverified HAIL site (previous use for clay target shooting) and 317 is registered as containing uninvestigated persistent pesticide bulk storage.

Servicing
69. Proposals for servicing the Site and the effects from such servicing in relation to domestic water supply, wastewater, stormwater, roading, and telecommunications will be required for any subdivision consent.

Economic effects

70. It is anticipated that urban development will generate positive economic effects, both from the investigation/development phase and for the longer run economic activity from householders participating in the local economy.

Climate Change effects

71. An assessment of the effects of the proposed rezoning on climate change is included as part of the assessment of a well-functioning urban environment above.

72. A well-functioning urban area that is designed and serviced in an integrated manner, applying sound urban design principles, will enable a reduction in greenhouse gas emissions compared to unplanned, ad hoc development that does not create compact urban forms located where the services and benefits of existing, established urban areas are not readily accessible.

73. There is a triangle of planning influence that can be brought to bear on reducing greenhouse gas emissions

a) Compact urban form minimising distances between homes and work/play options.

b) Proximity of homes to community facilities, services and amenities and business/work areas.

c) Design and provision of movement corridors and linkages that create opportunities other than for vehicles for getting around.

74. The Site of the proposed rezoning:

a) Helps in retaining a compact urban form to Rangiora.

b) Is easily accessible to the town centre and is located convenient to the recreation resources of the nearby Rakahuri/Ashley River, the airfield and racecourse and Arlington Park.

75. Rangiora has excellent connectivity to the City, both via the Northern Motorway, the new Northern Corridor, a cycle way link to Kaiapoi which is linked to the new north city cycle way along the Northern Corridor and a very regular bus service.

Positive effects

76. The proposed rezoning will provide for the continued growth of Rangiora by managing the development through an ODP. The proposal will provide a buffer to on-going high level demand for lots in Rangiora. It will cater for a specific housing need not found in GRZ Zoned land nor LLRZ land. The proposed rezoning is anticipating a form of development that is a much more efficient use of a qualifying site supporting a well-functioning urban area. It is a positive endorsement of Rangiora as a growth node in the District.

77. The benefits derived from a planned ODP approach include facilitating high levels of connectivity, creating community links to identified focal points. The Site is close to recreation facilities. A coordinated and integrated development will provide a distinctive environmental quality and point of difference to the development.

78. The Site adjoins existing and developing residential development on the western edge of Rangiora.

79. From a community well-being perspective, the provision of additional land for residential growth will continue to support the Council's investment in community infrastructure by maintaining and facilitating growth rates, increasing the rating base and attracting development contributions.

STATUTORY PLANNING ASSESSMENT

80. Submissions must be assessed under the provisions of the RMA, including Part 2 and Section 32 (Requirements for Preparing Evaluation Reports).

National Policy Statements

National Policy Statement on Urban Development Capacity (NPS-UD)

81. The NPS–UD applies to this proposal as it is directed at Tier 1 urban environments, and
Tier 1 local authorities which includes Waimakariri District as part of the Christchurch urban environment that is defined in Table 1 of the NPS, and additionally defined as:
any area of land (regardless of size, and irrespective of local authority or statistical boundaries)
that: is, or is intended to be, predominantly urban in character; and is, or is intended to be, part of
a housing and labour market of at least 10,000 people.

82. The NPS-UD recognises the national significance of:

a) Having well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future; and

b) Providing sufficient development capacity to meet the different needs of people and communities.

83. The NPS outcomes are to be achieved through objectives that address:

a) Planning decisions improving housing affordability by supporting competitive land and development markets.

b) Regional policy statements and district plans enabling more people to live in areas of urban environments near centres or areas with employment opportunities, area well serviced by public transport or a high demand for housing in the area.

c) Urban environments developing and changing over time in response to diverse and changing needs of people, communities and future generations.

d) Local authority decisions on urban development being integrated with infrastructure planning and are strategic over the medium term and long term.

e) Local authority decisions on urban development are responsive particularly for proposals supplying significant development capacity.

f) New Zealand's urban environments support reductions in greenhouse emissions and are resilient to current and future effects of climate change.

84. The key method to achieve these objectives is by development of a Future Development Strategy (FDS). This will set out how the Councils will provide for sufficient development capacity over the next 30 years to meet expected demand. There is no FDS for the greater Christchurch Urban Area that meets the requirements of the NPS-UD.

85. Work on development capacity completed for the NPS - UDC 2016 by the Greater Christchurch Partnership as an Update of the existing Urban Development Strategy (UDS) – Our Space 2019 confirmed what there was a shortage of feasible development capacity for future housing in Waimakariri District for the medium (next 10 years) and long term (10 to 30 years) periods. That assessment is now out of date as it does not address the requirements of the NPS-UD; and rates of take up of land have exceeded projected rates.

86. One of the key changes in the NPS-UD is that local authority decisions on urban development that affects urban environments are responsive, particularly to proposals that would supply significant additional capacity. It also amends the required methodology for housing and business capacity assessments.

87. The current CRPS does not meet the new NPS-UD requirement in relation to proposals for significant additional capacity. Regional councils are required to include criteria in the RPS to determine what plan changes will be treated for the purposes of Policy 8 as adding significantly to development capacity as soon as practicable. ECAN has yet to respond to this requirement.

88. The NPS-UD has immediate effect, so in the meantime, proposals such as this submission must be assessed in the context of the overall intent and purpose of the NPSUD as articulated in the NPS-UD objectives and policies. This includes that NZ has well-functioning environments; provides sufficient development capacity to meet the different needs of people and communities; planning decisions improve housing affordability to contributing to competitive house and land markets; and RMA plans enable more people to live near major employment areas, where there is existing or planned public transport, and where there is high demand for housing.

89. The NPS-UD is the higher order document and its requirements override those of lower order documents where there is a conflict, including regional and district RMA plans.

90. Key objectives and policies in the NPS-UD are assessed here:

NPS-UD Objective/Policy	**Assessment**
Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	The proposed development will further enable Rangiora to sustain itself as a well-functioning urban environment by consolidating the residential area close to the town centre, and provide residential development close to public transport links and existing community and commercial facilities including Huntingdon Drive local centre.
Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.	The proposal provides choices in the Rangiora housing market and in doing so supports housing affordability. Whilst the proposal is for a premier larger lot urban residential development, it is important that all sectors of the market are catered for. This will be more affordable than forcing those wanting large sections out to the much larger and very limited areas of LLR D1 development, or having to purchase 2-3 sections in a standard residential subdivision. There Site is in multiple ownership and the landowners are working together to achieve the rezoning. It will bring more competition into the market by bringing new entrants into the market.
Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply: the area is in or near a centre zone or other area with many employment opportunities the area is well-	The CRPS is due for review in 2024 but in the meantime the existing CRPS is not in accordance with the NPS-UD 2020. The proposed rezoning is on the edge of the District's largest centre, which offers a wide range of community and business services, and employment opportunities. It is expected that a proportion of future residents will commute outside the township, but as the township and associated business areas e.g. at Southbrook, continue to grow, this is expected to become proportionally less. Rangiora is well serviced with public

serviced by existing or planned public transport there is high demand for housing or for business land in the area, relative to other areas within the urban environment.	transport, there is scope for future mass transit PP, and there is a high demand for housing at Rangiora. The Site adjoins the new West Rangiora Development Area, to the south. Extensions of public transport to service this growth area will be readily accessible to the Site.
Objective 6: Local authority decisions on urban development that affect urban environments are: integrated with infrastructure planning and funding decisions; and strategic over the medium term and long term; and responsive, particularly in relation to proposals that would supply significant development capacity.	Whilst not currently identified as a future growth area in RMA documents, the Site is well placed at the township edge to be serviced by existing infrastructure. Some upgrades may be required, which will be investigated further with Council prior to the hearing. See Policy 8 below for commentary on proposals which supply significant development capacity
Objective 8: New Zealand's urban environments: support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change	The proposal adjoins the existing built up are of Rangiora, close to public transport links. Its excellent accessibility to Christchurch City, substantially enhanced with the new Northern Motorway extensions, means it is now highly accessible to these nearby major employment areas. Travel distances are relatively short, minimising vehicle miles and the potential for greenhouse gas emissions. There is a cycleway link from into Christchurch City, and regular bus services, including an express route. The Site is inland and not subject to natural hazard risks associated with sea level rise arising from climate change.
Policy 1 – Planning decisions for well-functioning urban environments	Assessed at para 41-50
Policy 2 - Sufficient development capacity Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.	The proposed rezoning is anticipated to provide sections that will be available for the short term (up to 3 years) and into the medium term (3-10 years) if adopting a more conservative outlook. The locational and amenity advantages of Rangiora also favour strong ongoing demand. The PWDP UFD-O1 Feasible Development Capacity for residential activities identifies the need for 6300 residential units in the period 2018-2028, and 7100 residential units 2028-2048. These numbers are derived from Chapter 6 CRPS Table 6.1. and are out of date. Data from the Council (November 2021) confirms that there are about 800 vacant lots in Rangiora. Building consents are at about 180/year. That means there is about 4 years vacant land supply. A lead in time of 3-5 years is needed to go from rezone to house build so the Council is facing an unnecessary squeeze on land availability. That will translate in to an upward shift in land and section prices as has been the case at Rolleston. The data suggests that the PWDP will be late to the party to ensure there is at least sufficient development capacity to meet expected demand for housing land over the short term, medium term, and long term. There is a looming, inevitable land supply issue so any proposal to add capacity will push the Council closer to meeting the requirements of the NPS-UD. The proposal is consistent with ensuring there is at least sufficient land supply for

	housing.
Policy 8 – Responsiveness to plan changes Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is: (a) unanticipated by RMA planning documents; or (b) out-of-sequence with planned land release	The proposed rezoning is not anticipated by RMA documents - it is not a Greenfield Priority or Future Development Area in the CRPS, or a New Development area in the PWDP. A responsive approach to the proposal is required as it meets the Policy 8 criteria for unanticipated zoning. It will contribution to well functioning urban environments and will add significant development capacity. There is no development capacity for the housing typology proposed – so any provision is significant in this context. The development will deliver appx 311 high amenity large lot residential sites at an average density of 1500m2. This will be higher if a mix of densities are proposed, which may be appropriate in some parts of the Site, dependent on master planning work to follow.

91. Adopting the submission to re-zone the land, and enable the proposed development on the submission Site will satisfy the objectives and policies of the NPS-UD.

Proposed National Policy Statement for Highly Productive Land (NPS-HPL)

92. The Government proposed in 2019 a NPS-HPL to prevent the loss of productive land and promote its sustainable management. The overall purpose of the proposed NPS-HPL is to improve the way highly-productive land is managed under the Resource Management Act 1991 (RMA) to:

a) Recognise the full range of values and benefits associated with its use for primary production
b) Maintain its availability for primary production for future generations
c) Protect it from inappropriate subdivision, use, and development.

93. The NPS-HPL is still a proposal and not intended to take effect until after Gazettal. At the date of this submission the NPS-HPL has no effect and no assessment of it is required for the purposes of this submission.

94. The Proposed NPS-HPL interim definition of HPL is land defined as Land Use Capability Class 1-3 soils. A portion of the Site contains Class 2 and 3 soils (see **Figure 10)**. Highly productive use of these soils is not realistic given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production). Its present use as lifestyle blocks, low level grazing and agistment is the more likely long run use of the Site if not rezoned.

95. Objective 3 of the Proposed NPS-HPL specifically refers to highly productive soils being protected by avoiding *"uncoordinated urban expansion on highly productive land that has not been subject to a strategic planning process"*. The Site was assessed through a strategic planning process (WDDS 2018) and the RRS as a preferred site for LLRZ development, and rejected for a change in zoning on the basis that it may be required for long term urban growth of Rangiora.

96. It is therefore considered that this submission to re-zone the Site is largely in accordance with the Proposed NPS-HPL.

National Planning Standards

97. The National Planning standards prescribe various matters under the RMA so that there is consistency among planning documents most relevantly here in terms of appellations for zones, and the standards applying to these zones.

98. The proposed rezoning adopts the standard zone appellation, in this case LLRZ as contained in the PWDP.

99. The PWDP identifies plan standards for minimum and average net site areas for the respective zones. These are modified for the proposed rezoning as a higher density LLRZ.

100. The higher density LLR zoning is entirely consistent with the NPS purpose for the LLRZ as reproduced below. In this case, the principal constraint to more intensive development is the peri-urban location where a lower density transition to the rural environment is appropriate (particularly noting that the zone boundary is 'mid block' so there is no natural or physical buffer

between rural and residential areas); the existing pattern of 4 ha lots with existing substantial homes and gardens; and the fact that the premier large lot subdivision proposed relies on consistency of housing quality and character to be deliver on this vision for the area.

Large lot residential zone

Areas used predominantly for residential activities and buildings such as detached houses on lots larger than those of the Low density residential and General residential zones, and where there are particular landscape characteristics, physical limitations or other constraints to more intensive development.

Low density residential zone

Areas used predominantly for residential activities and buildings consistent with a suburban scale and subdivision pattern, such as one to two storey houses with yards and landscaping, and other compatible activities.[2]

Canterbury Regional Policy Statement 2013 (CRPS)

101. Chapter 6 of the RPS *"provides a resource management framework for the recovery of Greater Christchurch, to enable and support recovery and rebuilding, including restoration and enhancement, for the area through to 2028. Recovery in Greater Christchurch is also supported by the provisions in Chapter 5 notated as 'Entire Region'. The provisions in the remainder of the RPS also apply.3"*

102. An assessment of the proposed rezoning against the relevant CRPS Objectives and Policies is set out in **Appendix 1**. This should be read in the context of the CRPS being overdue for review and that it does not provide a regional response to the NPS-UD. The

need to focus on earthquake recovery has now passed and so many of the directive provisions need to be given appropriate 'weight' in a new national policy environment with a focus on flexible, responsive panning approaches that better provide for people's needs and well-being.

103. That assessment shows that

a) The development proposal achieves the objectives for the location, design and function of new developments (Objective 5.2.1)

b) The traffic effects of the proposal are unlikely to give rise to adverse effects and so achieves CRPS objectives for the strategic land transport network (Policy 5.3.7)

c) The Site falls outside the FDAs shown on Map A of Chapter 6 and in that regard is inconsistent with RPS Policy 6.2.1 clauses 1 to 3.

1. identifies priority areas for urban development within Greater Christchurch;

2. identifies Key Activity Centres which provide a focus for high quality, and, where appropriate, mixed-use development that incorporates the principles of good urban design;

3. avoids urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS

d) The environmental effects assessment outlined above establish that the proposed development is consistent and will not give rise to any concerns with respect to all the matters listed in RPS Policy 6.2.1 clauses 4. to 11. These matters are:

6.2.1 Recovery framework

Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that:

1. As above;

2. As above;

3. As above;

4. protects outstanding natural features and landscapes including those within the Port Hills from inappropriate subdivision, use and development;

5. protects and enhances indigenous biodiversity and public space;

6. maintains or improves the quantity and quality of water in groundwater aquifers and surface waterbodies, and quality of ambient air;

7. maintains the character and amenity of rural areas and settlements;

8. protects people from unacceptable risk from natural hazards and the effects of sea-level rise;

9. integrates strategic and other infrastructure and services with land use development;

10. achieves development that does not adversely affect the efficient operation, use, development, appropriate upgrade, and future planning of strategic infrastructure and freight hubs;

11. optimises use of existing infrastructure; and

12. N/A

e) The proposed rezoning achieves policies relating to:

- Sustainability;

- Integration of transport infrastructure and land use;
- Urban design; and
- Biodiversity, natural hazards, landscape, soils, contaminated land.

104. In terms of the CRPS polices for rural residential developments (Policy 6.3.9) the proposal sits square with all policy matters other than being a location identified in an adopted Rural Residential Strategy; and being at a higher density than provided for under this policy (ie greater than 1-2 hh/ha). As such it has a majority of features entirely consistent with the policy.
105. The CRPS includes housing capacity targets as below

6.2.1a Targets for sufficient, feasible development capacity for housing [inserted in accordance with sections 55(2) and 55(A) of the Resource Management Act 1991, from the National Policy Statement on Urban Development Capacity 2016]
For the period 2018-2048, sufficient, feasible development capacity for housing is enabled in Greater Christchurch in accordance with Table 6.1.
Table 6.1 Targets for housing development capacity in Greater Christchurch, 2018-2048

106. These derive from Our Space, under the requirements of the then NPS-Urban Development Capacity 2016, since replaced by the NPS-UD 2020. The targets (known as bottomlines in the NPS-UD) are to be treated as 'minimums' not 'maximums'.
Policy 6.3.12
enables urban development in the Rangiora and Kaiapoi FDAs (new Development Areas in the PWDP) where needed to meet the medium term targets. This a 'minimum' allocation approach contrary to the NPS-UD. The NPS-UD favours over allocation, including in locations unanticipated by RMA plans, where it will add additional development capacity, can be integrated with infrastructure planning and funding, and will contribute to well functioning urban environments – as is the case the proposed Lehmans LLR D2 zone.
107. The proposed Lehmans LLR D2 zone is consistent with the CRPS except with respect to those parts of the CRPS which are out of step with and do not give effect to the higher order plan, the NPS-UD.

Proposed Waimakariri District Plan
108. An assessment of this proposal against the relevant PWDP Objectives and Policies for urban growth and development as notified on 17 September 2021 is set out in **Appendix 2.**
109. That assessment shows that the proposed rezoning is entirely consistent with the relevant objectives and policies, including as sought to be amended by this submission. Those amendments are to UFD-P3 Identification/location and extension of Large Lot Residential Zone areas; and LLRZ-O1 and LLRZ- P1-5 and reflect the intent and outcomes intended for the proposed LLRZ D2 zone, which is a higher density LLRZ zone than the PWDP LLRZ zone (renamed LLRZ D1 in this submission).

ASSESSMENT AGAINST OTHER PLANNING DOCUMENTS
Our Space 2018-2048 Greater Christchurch Settlement Update (2019)
110. Our Space is a non-statutory document prepared under the Local Government Act. It
"responds to the new Government Policy Statement on Land Transport, which has increased funding for mass public transit schemes, and meets the requirement of the National Policy Statement on Urban Development Capacity (NPS-UDC) 2016 to prepare a
future development strategy…. Specifically, it:
• sets out how targets for housing for the next 30 years will be met, accommodating an additional 150,000 people;
• identifies locations for housing growth, encouraging Central City and suburban centre living while providing for township growth in Rolleston, Rangiora and Kaiapoi;…
• promotes a compact urban form, which provides for efficient transport and locates development in a manner that takes into account climate change and sea level rise.[4].

..Underpinning this settlement pattern approach is the vision for a transformation of the transport network that fosters much greater public and active transport usage, and reduced reliance on the private vehicle.
111. Our Space acknowledges that this will require commitment from the Government to invest in the necessary improvements to our transport system, which could include investing in rapid transit services. To date, there has been no successful business case for improved public transportation, including not as a Covid 19 fast track infrastructure project.
112. The Our Space housing capacity targets (Table 3) and Future Development Areas are related to growth of urban areas.
113. Our Space, like the CRPS (and the Operative District Plan) are now out of date, as they do not reflect or give effect to the new requirements of the NPS-UD.

Waimakariri 2048 District Development Strategy (WDDS)

114. The preferred growth directions for Rangiora in the WDDS 2048 (2018) are outlined above (under 'Site') i.e. westwards to Lehmans Road, and otherwise eastwards. However, the Council in its decision on the RRS, recognized west of Lehmmans Road as a potential longer town urban growth area.

115. The WDDS Rangiora Snapshot (pp38-39) -when looking ahead to 2048 proposed that:

a) Rangiora remains the District's largest town
b) 30,000 – estimated population (2048)
c) 12,025 – estimated households
d) 5,025 - new households in Rangiora
e) Continues to accommodate one third of the District's residential growth
f) 167 – estimated annual building consents for new dwellings for the next 30 years
g) 423 hectares of additional feasible residential land required by 2048 (this includes capacity in remaining stages of existing residential developments as well as new greenfield areas inside and outside of the Infrastructure Boundary)
h) Future residential growth directions proposed to the east (predominantly) and west of the current town
i) Opportunities for intensification/regeneration to be identified
j) New growth directions take into account areas of unacceptable natural hazard risk and areas of significant environmental and cultural values
k) New growth areas to connect into existing sewer and water networks
l) Stormwater Levels of Service designed to meet increased performance requirements

116. At the 2018 Census Rangiora had a population of 17,841, and 7314 total dwellings (incl those unoccupied and under construction). Population projections for the District show an average annual change 2018-2020 of 1700 persons. If Rangiora continues to attract a third of all district growth as stated in the WDSS then Rangiora's population in 2021 will be around 18,900.

Mahaanui Iwi Management Plan

117. Part 1 of the PWDP in a section "Mana Whenua" sets out the position with respect to iwi and the review of the district Plan:

a) The District's territorial area sits within the takiwā (territory) of Ngāi Tūāhuriri which is one of eighteen Ngāi Tahu regional papatipu rūnanga, constituted under the ***Te Rūnanga o Ngāi Tahu Act 1996*** *to represent* ***mana whenua*** *interests.*

b) The preparation and change of a district plan must take into account relevant iwi documents. For the District, Ngāi Tahu has set out its resource management values, issues, objectives and policies within the Mahaanui Iwi Management Plan (2013).

c) The Mahaanui Iwi Management Plan identifies objectives, issues and policies for natural resource and environmental management for six pāpatipu rūnanga (including Te Ngāi Tūāhuriri Rūnanga). It seeks to ensure that the taonga and resources of Ngāi

Tahu mana whenua are recognised and protected in the decision-making of statutory agencies. The Mahaanui Iwi Management Plan contains a comprehensive suite of policies and objectives addressing the range of resource management matters of significance to tangata whenua. The District Council shall have regard to the Mahaanui Iwi Management Plan when preparing or changing the District Plan, to the extent its content has a bearing on resource management issues of the District.

118. The Mahaanui Iwi Management Plan (MIMP) 2013 was released on 1 March 2013.

119. The MIMP is a tool for tangata whenua to express their identity as manawhenua and their objectives as kaitiaki, to protect their taonga and resources, and their relationships with these. The MIMP seeks to ensure that these taonga and resources are recognised and protected in the decision-making of agencies with statutory responsibilities to tangata whenua. Importantly it is also a tool that assists Papatipu Rūnanga representatives to articulate their values, issues and policy into statutory processes.

120. The MIMP includes both general objectives and policies about the management of land, air, and water, and also includes catchment specific objectives and policies.

121. Section 5.3 Wai Maori (pp77-98) contains an extensive discussion about tangata whenua rights and interests in freshwater. It provides a suite of Issues, Objectives and Policies for freshwater

122. Section 5.4 Papatuanuku (pp101-124) sets out the Ngai Tahu Subdivision and Development Guidelines that are to be read along-side objectives relating to:

a) Land use planning and management in the takiwā reflects the principle of Ki Uta Ki Tai. (from the mountains to the sea)

b) Rural and urban land use occurs in a manner that is consistent with land capability, the assimilative capacity of catchments and the limits and availability of water resources.

c) Inappropriate land use practices that have a significant and unacceptable effect on water quality and quantity are discontinued.

d) Ngāi Tahu has a prominent and influential role in urban planning and development.

e) Subdivision and development activities implement low impact, innovative and sustainable solutions to water, stormwater, waste and energy issues.

123. Section 5.5 Tane (pp127-137) includes objectives that focus on:

a) Regional policy, planning and decision making in the takiwā reflects the particular interest of Ngāi Tahu in indigenous biodiversity protection, and the importance of mahinga kai to Ngāi Tahu culture and traditions.

b) The customary right of Ngāi Tahu to engage in mahinga kai activity is recognised, protected and enhanced…

c) Customary use, and therefore mahinga kai, is given effect to as a first order priority for freshwater management in the takiwā.

124. Section 6.4 (pp213-224) addresses issues of particular significance to the lands and waters of the Waimakariri catchment within which the Site lies.

125. Relevant Objectives relating to urban development of land in that catchment include:

a) The natural "energy, vitality and life" of the Waimakariri River as a braided river is protected and restored.

b) The discharge of contaminants to the Waimakariri and its tributaries is eliminated.

c) Water quality and flows in the Waimakariri and its tributaries are improved to enable whānau and the wider community to have places they can go to swim and fish.

d) The mauri and mahinga kai values of the Waimakariri and its tributaries and associated springs, wetlands and lagoons are protected and restored; mō tātou, ā, mō kā uri ā muri ake nei.

126. A key issue relating to subdivision and development is that subdivision and development activities in the lower catchment have the potential to adversely affect Ngāi Tahu values such as waterways, mahinga kai and sites of significance (Issue Wai4).

127. The proposal provides for full urban reticulation of the three waters and is consistent with the objectives and policies contained in Chapters 5.3 and 5.4 of the MIMP. The proposal does not preclude individual land owners from installing rainwater collection and use from roof areas at the time of building development.

128. The proposal has been designed taking into consideration the potential effect of resultant subdivision and development on the rivers and streams that flow into the lowland rivers.

129. Overall it is considered that the proposal will not have adverse impact on the cultural values of iwi as set out within the MIMP.

SECTION 32 ASSESSMENT

130. A Section 32 assessment is contained in **Appendix 3.**

131. In summary, the PWDP zoning and associated rules (RLZ Zone with a minimum lot size for subdivision and a dwelling 4ha) do not meet the needs and aspirations of the current owners.

132. Strategic Council planning documents (specifically the WDDS) have a focus on only meeting urban growth demands within urban environments of existing towns. They favour intensification (15hh/ha) and a strict allocation of capacity by development areas. It is a control and command regime consistent with Map A of Chapter 6 of the CRPS but is out of step with the requirements of the NPS-UD which requires a more flexible, responsive approach, prohibits a hard fixed unmoveable urban/rural boundary.

133. This approach leaves little room for new proposals or proposals that do not sit square with the standard array of GRZ/medium density or SETZ (Settlement Zone). SETZ applies to some of the District's smaller settlements outside Greater Christchurch.

134. Neither LRZ nor Large Lot Residential (LLRZ) as notified in the PWDP is an efficient use of this block of land located as it is immediately adjoining the urban area of Rangiora, and in a location easily accessible to the town centre by active transport modes as well as car and several district reserves.

135. If this Site is not zoned for LLRZ D2 (minimum average lot size 1500m^2) use to enable residential re-development then it will drive pressure to re-zone elsewhere. That step potentially will not have the significant benefits to Rangiora long term in relation to enabling a well-functioning urban environment that enables people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future. Additionally re-zoning to LLRZ D2 will contribute to providing additional development capacity to meet the different needs of people and communities in a planned manner and consistent with the NPS-UD.

136. The Site can readily be developed to reflect the principles of the Urban Design Protocol with values of character, context, and connectivity.

137. The Section 32 assessment concludes that the proposal to re-zone the Site from LRZ zone to LLRZ D2 Zone (average lot size 1500m$_2$) is the most appropriate method for achieving the objectives of the proposal, than the other alternatives considered.

138. Option 2 identified in the s 32 assessment is consistent with some PWDP policies notwithstanding that it does sit square with the strategic intentions signaled in the WDDS and the PWDP approach to providing for development capacity and urban development.

139. Option 2 identified in the s 32 assessment to re-zone the Site is the most appropriate given:

a) The proposals adopt the PWDP zones, development and activity standards with appropriate amendments. This ensures continuity of the District Plan anticipated environmental outcomes and urban amenity for Rangiora and adjoining residential areas;

b) Will be consistent with and give effect to many of the relevant PWDP objectives and policies;

c) It is a logical extension to the developed and developing residential land adjoining the Site while achieving a compact, efficient urban form that removes pressure on isolated rural land elsewhere around Rangiora.

d) It gives effect to the NPS-UD, specifically Objective 6 c) and Policy 8, delivering significant additional development capacity and contributing to a well functioning urban environment.

e) It is assumed that there will be capacity in the public utilities and the existing road network, including planned upgrades, to accommodate the traffic effects of the redevelopment;

f) The proposed Site specific ODP will provide certainty of the final form and disposition of the re-zoned area including its proposals for reserves, roading, future linkages for pedestrian and vehicular traffic.

140. The re-zoning proposal is considered to be appropriate to achieve the sustainable growth and development of Rangiora.

141. The economic, social and environmental benefits of the proposed rezoning outweigh any potential costs.

142. The overall efficiency and effectiveness of the proposed rezoning (Option 2) is high, in comparison to the alternative options set out in the s 32 Assessment which are low (Options One and Four) or low to moderate (Option Three).

143. The PWDP proposes to release land for development in the new Development Areas at Rangiora and Kaiaipoi through a novel and untested certification process that is not clearly derived from RMA statutory powers, nor Local Government Act 2002 (LGA) authority. This approach is not proposed for the LLR Overlay areas. As the proposed Lehmans Road LLR D2 zone proposed by this submission seeks large lot urban densities, it is anticipated that Council may favour the certification process if it accepts the proposed rezoning. This is opposed – rezoning to LLRZ D2 is sought.

144. Potential difficulties with the proposed certification process are identified and discussed in the Section 32 Assessment. (**Appendix 3)**. In summary, the process is hugely discretionary, does not provide conventional rights to an applicant (eg right of objection/appeal) meaning decisions cannot be challenged, and it is not apparent that the process will be appropriately documented with a transparent record of the decision-making within the certification process. Further uncertainty arises in the practicalities of how to negotiate and manage the staging, funding and building of key infrastructure across a range of Sites, and a risk that land supply is controlled by a limited number of large developers. It is a far less efficient and effective method for delivering land for housing than the Council rezoning the land in the PWDP.

145. The proposed rezoning is considered to be the most appropriate, efficient and effective means of achieving the purpose of the RMA.

CONSULTATION

146. The landowners and their consultants have submitted on the WRRS and the WDDS (**Appendix 4)**.

147. The submissions to re-zone as rural residential or identify the Site as suitable for LLRZ have been rejected as noted above. LLRZ but at higher densities as now proposed is considered to be a more efficient use of the land and better meets market demand. 5000m^2 sites provide more land is needed for a spacious home and garden.

148. The landowners have been consistent in their wish to find a zone and possible land uses better suited to their needs.

CONCLUSION

173 The submission seeks to rezone 58 ha of land adjoining Rangiora from Lifestyle Rural Zone (LRZ) to Large Lot Residential with a specific density standard (LLRZ D1), minimum average lot size 1500m^2.

149. The Site has a long history of rural lifestyle use. It is not significantly restricted by potential natural hazards especially flooding, nor does it have physical limitations for development for residential purposes as it is not liquefaction prone, and has no known geotechnical limitations but does contain an area of LUC 2 soils. It is near a site of significance to iwi (SASM – 025) being the Rakahuri/Ashley River The Site has access to a collector road and is near to a strategic road giving direct access to the town centre and a range of community amenities and facilities.

150. The Site immediately adjoins the urban area of Rangiora, and is well located to join in to Council utility services. It is well suited for conversion to residential use.

151. The Site is not identified within the westward growth direction for Rangiora in the District Development Strategy 2018 nor is it part of the DEV-WR development area which adopts Lehmans Road as its western boundary. It is in a location that achieves coherent and compact urban form offering ease of access to business services, community facilities, reserves and the primary road network.

152. The proposed rezoning provides for a connected and high amenity residential living environment not presently available under the PWDP while avoiding and/or mitigating any potential adverse effects on the environment. It will provide for continuing high demand for a variety of high quality residential sections aimed at a particular segment of the housing market in an ideal location, easily accessible to the existing town centre services and facilities. It will broaden the range of housing available. As such, it is consistent with the NPS-UD including Objective 6c) and Policy 8, to be responsive to proposals which supply significant development capacity and contribute to a well functioning urban environment.

153. The use of this Site for residential purposes can be a sustainable and efficient use of land and infrastructure. The proposed rezoning better provides for the social, economic, environmental well-being of the landowners and the Rangiora community than continuation of the current low intensity lifestyle land use on 4ha blocks, or a conventional LLRZ residential use.

154. Any potential adverse effects of the implementation of the proposed rezoning can be assessed at subdivision stage but

there has been no restriction on servicing the blocks to date. Capacity will need to be confirmed for infrastructure, power and road network. Any future subdivision of the Site will need to confirm water supply and wastewater treatment and disposal options.
155. Rezoning of the site to LLRZ zone is not inconsistent with the policies and objectives of the PWDP, but it is at odds with the dated CRPS approach to provision of urban growth and housing capacity for Greater Christchurch, to the extent that it is not within an FDA created by Change 1 to the CRPS and is not identified as an LLRZ site under the strategic RRS prepared by the Council.
156. As the proposal helps achieve the purpose of the RMA, and has been shown to be consistent with the relevant provisions of the NPS-UD, the submission can be accepted by Waimakariri District Council.

Original Submission

Summary Reasons for the Submission

The reasons for our submission are outlined below.
a) The preferred relief (**the proposed rezoning**) is both appropriate and necessary to achieve sustainable growth and development of Rangiora and the District and meet the requirements of the National Policy Statement for Urban Development 2020 (**NPS-UD**).
b) The Site identified in Figure 1 and at para 1 of the Preferred Relief above is a logical and preferred location that lends itself to a specific type of housing development not provided within the PWDP as a residential option adjoining but outside the existing urban areas. Nowhere is it possible to develop in a comprehensive, coordinated way a low density, high quality residential environment in the District's towns, the Rural Lifestyle Zone or Settlement Zone as a permitted activity.
c) The requirement for 12/15 hh/ha in GRZ zones (the majority of land in urban areas) drives development to modern scale relatively small urban lots best produced as a package across a significant land holding. The GRZ subdivision standards do not provide for the needs of people who seek a generous sized urban lot residential setting. This is a housing sector that is running against the planning tide of intensification but is, nonetheless, a legitimate form of housing in an appropriate setting. The barriers to such development in urban areas requires an appropriate setting/ location in the rural areas but close to or adjoining the urban areas and at a much lower density than is desired or appropriate (the PWDP LLRZ) to meet the housing needs for generous sized urban lot residential living..
d) The PWDP subdivision standards for LLRZ require lots that are very large for those whose primary interest in a rural setting is a form of residential living, not one that requires significant maintenance and management often involving animals or machinery at scale. Conversely, the GRZ subdivision standards do not provide for the needs of people who seek a large lot residential setting
e) The focus in the PWDP is on prescribing a limited range of residential options and tightly controlling and constraining housing choice within those options. Further urban growth is also tightly constrained and controlled around DEV areas around Rangiora and Kaiapoi but for a very specific form of residential development driven off density requirements that do not match the needs of all landowners.
f) The focus in most new District Plans, driven in part by the National Planning standards, is to simplify the range of zones, to standardize lot sizes, to supposedly create efficiency and certainty through ease of administration of the District Plans. This is done by constraining housing and land development choices by lot size, by location, by built standards and the disposition of built/open elements in a site. However, the National Planning standards do provide for large lot urban residential living, a residential living option which has not been taken up the PWDP (due most likely to the restrictive provisions of the CRPS which only prescribe one from of lower density residential living, at a density of 1-2 hh/ha).
g) This planning approach may be a standard approach to resource allocation but it does not provide a flexible, responsive approach to innovative and new development options. The Government is creating policy settings that on one hand seek intensification in urban areas, while at the same time pushing away from a land allocation model of planning. The PWDP in striving to face both policy directions has a package of measures that are in fact a major barrier in terms or cost, timeframes and certainties for proposals that are not cut from the suite of housing and development options set out by the PWDP. The allocation of land in preferred development areas, it must be said, runs counter to the Government's push, and now its direction, to free up land for development, to encourage innovation in housing (presently with a focus of intensification) and to make available a range of responses to the need to meet the housing needs of people and communities set out in the NPS-UD.
h) While the weight of demand (and the planning response) is around affordable housing, around small lots and dense development that supports investment in public facilities and amenities such as public and active transport, reserves, and commercial services, there is always a wide spectrum of preferences at play in the housing market. The demand for high quality, generous houses set on generous sized parcels of land within high amenity settings is an important and no less relevant housing sector. There is a strong unmet demand, as confirmed by advice from Bayleys real estate (**Appendix 5**) for larger family homes with room for a pool or similar. Purchasers want to be close the amenities of Rangiora and within walking and cycling distance of local schools. They do not want the only available options – a 4 ha lifestyle block or 5000m^2 rural residential site at Mandeville or Ohoka.

i) Interestingly enough for a nation built on the so-called quarter acre paradise, recent policy and planning interest in housing and land development has now seemingly positioned the 1011m^2 section as a luxury item, as the antithesis of providing for community well-being and needs. It is as though the old quarter acre of itself acts against building a sense of community despite being able to be developed in a planned, structured, coordinated or integrated manner. Rather than being a frivolous discretionary item in land development
and housing choice, a well-planned, well located and properly serviced low density residential environment has much to offer urban environments. They can be tactically used to provide shape and edge to urban areas, they can provide a mass of amenity different from (and potentially complementary to), but no less legitimate in urban outcome terms, to conventional GRZ zoned land.
j) In many ways the approach of a district plan to the role and place of the old quarter acre is not dissimilar to the issues faced by comprehensive retirement villages when first proposed. The idea of dense, almost gated and self-contained communities, with multi storey buildings also did not sit well in many district plans. But now they are accepted as an important part of the urban fabric catering to a specific demographic and health demographic. Most plans enable them.
k) Provision for low density residential in an urban setting, or failing that likelihood, in an adjoining rural zone is a fundamental gap in the district plan.
l) The submission seeks to provide for another housing typology not provided in the PWDP and in a location with significant planning merit. The planning case was made out in a detailed submission to the proposed Rural Residential Strategy (**RRS**) for the land identified in this submission to be "reserved" for conventional Rural Residential zoning in the review of the District Plan. That submission was rejected in favour of a decision ascribing an unspecific strategic significance to Lehmans Road as the urban boundary; simply the decision was that rural residential development here would preclude this area as a future urban growth path, even though this was likely to be very long term as the Waimakariri District Development Strategy (WDDS 2018) for the period up to 2048, does not favour urban growth west of Lehmans Road.
Officer Recommendation
Continue to exclude the area west of Lehmans Road and the racecourse land at Rangiora as growth areas as these were originally considered but not included in the draft RRDS as they trigger the key preliminary criteria of: being on the direct edges of a main town outside of the Projected Infrastructure Boundary (PIB) thereby foreclosing more intensive long-term urban development, and…

Panel Recommendation
The panel accepted the officer recommendations to exclude areas on the fringes of Rangiora in the final RRDS due to these having the potential to foreclose more intensive long-term urban development of the town.

m) In light of the above decision on the Waimakariri Rural Residential Strategy, the proposal now is for a form of high amenity low density urban zoning, which whilst in demand is entirely absent from the PWDP. This will be a long term urban form of development. The proposal set out in the submission will achieve a compact, and efficient, urban form on the edge of Rangiora with excellent connectivity by multiple transport modes. It provides for continuous urban development by enabling a built form which can act as a strong zone or urban boundary.

n) The proposed rezoning will accommodate approximately 311 LLRZ lots1 at the proposed amended density standards for LLRZ D2 (average size 1500m^2). It will contribute to a well-functioning urban environment, meeting the NPS-UD Objective 6(c).
o) Any adverse effects on the environment arising from the proposed rezoning will be minimal, if any, and can be adequately mitigated. A high amenity master planned development is proposed.
p) Significant positive effects arise from the proposed rezoning. It will enable the short term housing demand at Rangiora to be met, and can deliver a housing typology for which there is demand, on lots that are not a burden to the landowners (which is the case for 4ha and the very limited areas of LLRZ D1 with a density of 1-2 hh/ha) and for which there is no provision in the PWDP. At present rates of land uptake there is about 4 years vacant land supply in Rangiora. Given it takes 3-5 years to bring land from zoned state to on the market as developed lots, there is some urgency in providing additional capacity. This proposal helps address an anticipated shortfall in residential zoned plan enabled land.
q) There is no additional cost to the Council in re-zoning the Site as there is expected to be capacity in the public utilities and the existing road network, including planned upgrades.
r) Amendments to PWDP objectives and policies may be necessary to provide for a higher density LLRZ, but of themselves will not act against those relating to Strategic Directions Urban Form and Development and Urban Growth. The PWDP approach to zones and
identification of future development land is already out of step with higher order Resource Management Act 1991 (RMA) statutory documents because they do not give effect to the NPS-UD (and are sought to be amended through this submission).
s) The alternatives of retaining Rural Lifestyle or Large Lot Residential zone across the entire Site are not an efficient use of land which immediately adjoins the urban area of Rangiora, and is highly accessible to the town centre by active transport modes as

well as car.
t) The proposed rezoning is consistent with and the most appropriate, efficient and effective means of achieving the purpose of the RMA.

The Site
1. The Site is a 58ha block of land ('the Site') accessed from Lehman Road, Rangiora **(Figure 1)**. It is owned by the two submitters and 12 other landowners.

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1 Assumes 20% of land area taken for servicing including roading, reserves and stormwater management if required.

Figure 1: The site (outlined in blue (Google Earth)

2. The Site is surrounded by RLZ land that is used for a mix of lifestyle and conventional farming. To the NE is the Rangiora Eco Holiday Park, and beyond the Park is the Rangiora Racecourse about 300m away from the nearest lot and 1km from the centre of the Site. Land to the south east is GRZ and part of urban Rangiora with newly developing residential land west of West Belt. About 1.9 km to the NW is Rangiora Airfield. About 1km north of the most northern lot is the Ashley River.
3. The southern-most lot in the proposal with the Rangiora Vet Clinic faces, but does not have access to Rangiora-Oxford Road (State Highway 72). This arterial road provides the main road connection in to the centre of the town. The well-established Fernside Rural residential area is about 2.5km west from the junction of Lehmans and Rangiora-Oxford Roads.

Figure 2: the site is a broader context (Site marked red)

4. The Site is not identified as lying within a preferred growth direction for Rangiora in the Waimakariri 2048 District Development Strategy (2018) (**WDDS**) **(Figure 3)**. No land west of Lehmans Road is included in the West Rangiora Development Area (**DEV-WR**) in the PWDP.

Figure 3: Figure 11 WDDS

5. The Council reviewed its strategic approach to the location and provision of Rural Residential land (now zoned LLRZ in the PWDP) in the WDSS. It adopted the position that it would:
a) Explore tools such as cluster development to manage rural character
b) For rural residential development, adopt an approach that has a primary focus on creating new rural residential areas, with a secondary focus on enabling large lot intensification within existing rural residential areas where there is sufficient community support and servicing available
c) Review the Rural Residential Development Plan for the whole District (pg 21 WDDS).

6. Rangiora presently has a population of 17,841 (2018 Census). It grew steadily between 2006 and 2018. Growth of Rangiora since then has continued in step with the district growth which has increased 8.2% between 2018 and 2021 from 61,300 to 66,300 at an annual average of 2.8% from 2018 to 2020 (Statistics NZ Subnational population projections at 30 June 2021: provisional).

2006 (count) 2013 (count) 2018 (count)

12,165 15,069 17,841

Statistics NZ

Population projections at 30 June

PLANNING STATUS OF THE SITE

Chapter 6 of the Canterbury Regional Policy Statement

7. An assessment of the CRPS is set out in **Appendix 1** to this submission.
8. The Site is within the Greater Christchurch area.
9. It was not shown as a Greenfield Priority Area – Residential (GPA) on Map A of the Canterbury Regional Policy Statement (CRPS). The GPA terminates at Lehmans Road.
10. As a result of the Minister for the Environment's decision of 28 May 2021 on Change 1 to Chapter 6, an area largely south of Oxford Road and a finger of land to the north of Oxford Road was included as a Future Development Area (**FDA**) (**Figure 4** orange).

Figure 4: Map A Chapter 6 Regional Policy Statement Greenfield Priority areas
Site location identified with red circle (appx)

11. The FDAs are intended to accommodate the increased demand for new dwellings in that part of Waimakariri District within the Greater Christchurch Urban Area and to respond to the NPS-UD. They do not provide "plan enabled" land as they need to negotiate a rezoning process to confirm their status as land developable for housing and other urban purposes.
12. The proposal for a LLRZ zone with average lot sizes of 1500m2 is inconsistent with the policy approach of Chapter 6 for Greater Christchurch, in that if fits none of the residential living typologies provided for in Chapter 6 and is not in a location identified for urban or rural residential development. It sits 'between' the urban and rural residential densities provided for in the CRPS (minimum 10 hh/ha for urban in Waimakariri, and average 1-2 hh/ha for rural residential). The proposed density is appx. 6.66 hh/ha.
13. Notwithstanding, the proposal meets all the location and other criteria in CRPS Policy 6.3.9 for rural residential development. It is:

- Outside the CIAL noise contours
- Has some sites with restrictions from the take-off and landing vectors for Rangiora Airfield but not such as to impact its operational capacity.
- Is outside the groundwater protection zone
- Is not within the Waimakariri stop bank system
- Has no views of or to the Port Hills
- Has good access for emergency services
- Will not create reverse sensitivity issues with adjoining land uses; Rangiora Racecourse is 500m away.
- Free of significant natural hazards and is a flat site.
- Supports no significant natural values or ecological values.
- Contains no SASMs.
- Can be integrated into or consolidated with the existing urban area of west Rangiora.
- Contains no surface water bodies so there will be no adverse impacts on these.
- The development will be contingent on an ODP to provide integrated design for subdivision and land use, and provide for the long-term maintenance of a high quality high density rural residential character.
- The proposal is not intended as a staged development towards full urban; rather it is intended to provide a unique residential environment that can stand alone and contribute to the urban fabric of Rangiora like Palmview in east Rangiora, or as Kaiapoi Lakes does for Kaiapoi.

14. Overall, the proposal is not consistent with Chapter 6 but that is more a function of its original purpose when formulated in 2013. Notwithstanding that, the submission for a lower density residential focussed, high quality urban environment that attaches to an existing urban area and that promotes a coordinated pattern of development has planning merit.

Operative Waimakariri District Plan

15. The Site is zoned Rural in the Operative Plan. The minimum lot size for subdivision and a dwelling is 4 ha.

Proposed Waimakariri District Plan

16. The Site is zoned Rural Lifestyle Zone **(LRZ) (Figure 4).** The minimum lot size for subdivision and a dwelling in the LRZ is 4 ha.
17. Oxford Road is a strategic road and Lehmans Road is a collector road.

Figure 5: Proposed District Plan Zoning (site outlined in red)

18. The Site is also subject to, or potentially influenced by, a number of Overlays:
a) Rangiora Airfield Take Off Climb and Approach Obstacle Limitation Surface (**Figure 6**)
b) National Grid Transmission Lines (**Figure 6**)
c) Liquefaction: Liquefaction damage is unlikely (**Figure 6**)
d) Non-Urban Flood Assessment Area (**Figure 7**)
e) Geographic areas: Ecological Area – Plains
f) Ecological District – Low Plains

Figure 6: Rangiora Airfield Take-off and Approach vectors (blue dashed lines); Liquefaction damage unlikely (green)Transmission lines (green lines); Site outlined in red

Figure 7: Non-urban flood assessment & Waimakariri Flood Hazard maps
Blue – medium risk, green – low risk, white – very low

DEVELOPMENT PROPOSAL AND PROPOSED REZONING
19. Subdivision of the Site will create approximately 311 LLRZ D2 lots.
20. The key design drivers for the proposal are:
a) A high amenity premier residential zone with large houses on large sites – average 1500m^2, min 1000m$_2$ based on the St Kilda, Hamilton development concept (**Figure 8**).
b) LLRZ D2 standards would enable a lower density zone in the medium term e.g. 10 years to achieve a high quality consistent character subdivision. If developed as an integrated development subject to an ODP subdivision can be staged for to the proposal.
c) Creating strong connections with the immediate neighbourhood by providing a cohesive interconnected roading layout that picks up direct links to the eastern neighbourhood off Lehmans Road and the northern subdivision roading, and carries them into the Site.
d) Creating a high amenity and diverse residential neighbourhood by providing interfaces to roads, reserves and rural environments.
e) Respecting and building on local identity and character of Rangiora by retaining specific vegetation features from the Site, and anchoring the development into the wider landscape.
21. A development concept can provide for sound urban design by:
a) A hierarchy of movement corridors.
b) Prioritisation of walking and cycling.
c) A north-south alignment of street blocks to maximize solar access and provide for efficient use of lots.
d) Block perimeters being kept as small as practicable to aid permeability and higher public amenity.
e) Enabling a range of housing typologies set in high quality landscape and street setting with generous amenity plantings and curtilage.

Figure 8: St Kilda development images (Bayleys)

22. St Kilda, Cambridge is a premier development on the outskirts of Cambridge, centrally located and with easy access to the Waikato Expressway. It was originally part of a small dairy operation which was dissected by the Waikato Expressway, leaving a portion within the Cambridge Town boundary and the larger balance of the property of approximately 80 ha (which became St Kilda) on the Eastern side of the Expressway, left in the Rural Zone.

23. The initial development concepts were for a Rural Residential type development given the Expressway separation of the existing residential development on the Western side of the Cambridge Bypass, however this was not supported by Council and a new concept of larger residential sections of a 1600m² average size was developed and approved – see https://www.stkilda.nz/page/location/

EFFECTS ON THE ENVIRONMENT

Township growth and urban form

24. The Site immediately adjoins the western edge of urban Rangiora.
25. The WDDS indicated a general preference for the direction of urban growth of Rangiora to the east as a way of balancing up the residential areas around the town centre and some growth to the west.
26. The approach of the WDDS was to signal growth options to be confirmed in the District Plan Review:

The broad directions for greenfield residential growth for the District's main towns are set out in Figures 11 to 14. Further work will be carried out to identify and confirm the exact locations and extent of these residential growth areas, together with the intensification opportunities within existing urban areas. These will be enabled through the District Plan Review and other planning tools.

27. The Strategic Planning documents clearly signal active consideration of growth needs and growth directions. The options available to the Council were constrained by the approach of the CRPS as the District Plan has to give effect to the CRPS and cannot be
inconsistent with it. The CRPS took effect in 2013 and is overdue for review.
28. The CRPS tightly holds urban growth to the constraints of Map A Chapter 6 and the identified FDAs which although amended by Plan Change 1 in 2020 does not respond to the directions of the NPS-UD. In any event the approach is focused on the need for housing in full urban residential land, less on other residential development forms.
29. As such the Site falls outside the planning policy framework for urban growth. However, in terms of urban form and on the ground, there is considerable merit and logic to conversion of this existing LRZ land to a new high amenity residential form that can be integrated into the Rangiora urban fabric.
30. The proposal has the potential to anticipate the longer term growth path confirmed by the decisions on the RRS to protect the future growth option of more intensive urban development in this direction. It can set a pathway to further westward expansion on land
that holds few if any physical barriers to land development.
31. The proposal will contribute to the housing needs of Rangiora and in a form and location that does not undermine the long run urban form of Rangiora. Planned growth confirmed in the PWDP is already intended to extend westwards out to Lehmans Road and to keep the town edge squared up providing depth to future development and providing a rational basis for providing movement networks driven off the key roads such as Rangiora-Oxford Roads. The West Rangiora Future Development Area confirms this approach. The Site sits in the next block west of Lehmans Road so is not proposing a disjointed urban form, nor one that is not part of the long term thinking of urban form and growth for Rangiora.

32. A full residential zoning is proposed under LLRZ D2 and will provide a high quality street character, overall amenity and passive surveillance over the street, and will create the correct lighting standards, roading standard, fully formed footpaths and cycleways required for a high quality urban environment.

Neighbourhood and wider community effects

33. The Site is serviced by a collector road and is close to an arterial road. This provides for ease of access and safe and convenient movement to and from the Site. A planned development co-ordinated by an ODP can facilitate within the site movement corridors and linkages through the Site to provide for walking and cycling.
34. A key positive neighbourhood and community effect will arise from the existing dwellings and their established gardens and plantings that will anchor new development and provide a point of reference for new dwellings. Development will not be on a bare site; it will take place in an existing established part-residential setting. The transition to a low density, high quality premier residential development will start from a favourable position and minimise the apparent extent and nature of the landscape change.
35. The Site is comparatively large (58.4 ha) and has the potential to support a variety of residential building typologies and this will contribute to a mix of households within the development and provide built form variety and interest in the streetscape. Whilst LLR D2 standards are proposed, it may be that part of the Site is suitable for other higher density forms of development, which would be within scope of the alternative relief, and could be considered as part of the master planning process required for preparation of an ODP (ahead of the hearing). The earlier stages of the St Kilda development were for large lot residential, with more clusters of townhouses included as later stages (and a retirement village). A retirement village is unlikely in this case, given the proximity of the Charles Upham Retirement Village.
36. Rangiora is well-positioned to accommodate and service the needs of a fast-growing resident population that will in turn support more business activity, schools, community facilities and community organisations.

Effects on tangata whenua values

37. The Proposed District Plan does not identify any Sites and Areas of Significance to Maori in the Site, but the nearby Rakahuri/Ashely River identified as SASM-025. This has been scheduled as being

River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species

38. The PWDP has Policy SASM-P8 which is relevant to pre-development processes:

Engagement with rūnanga

Te Ngāi Tūāhuriri Rūnanga and the District Council to encourage engagement with the Rūnanga priorto persons undertaking activities and/or applying for resource consent where the activity has thepotential to adversely affect identified sites or areas of Ngāi Tūāhuriri cultural significance. Where priorengagement with Te Ngāi Tūāhuriri Rūnanga h as not been undertaken by an applicant for an activitythat has the potential to adversely affect an identified site, the District Council will consult with the Rūnanga.

39. The Site is not listed as an archaeological site on the NZ Archaeological Site database.

Landscape and visual effects

40. Rural Lifestyle style development exists on the Site now (a series of 4 ha lots with a dwelling and associated accessory buildings on each). The landscape is dominated by shelter belts, utility buildings, significant trees and planted curtilages around dwellings many of which are well set back off the roads down RoWs.

41. An ODP will help to achieve an integrated, cohesive and coherent development The proposal will lead to a modification of the landscape of the Site from a predominantly lifestyle block landscape to a denser semi-urban environment dominated by residential building that will, in time, get the benefit of street tree and reserve plantings and landscape treatments around the houses.

42. The visual effects which will arise from a change in the number of vegetative and built elements in the landscape are significant, but not avoidable, if the Site is to contribute to the on-going growth of Rangiora. The change will contribute to a high quality amenity and quality of environment and one that will be entirely consistent with and supportive of the rural lifestyle residential development that has successfully established on the Site.

Well-functioning urban environments

43. The Site adjoins the existing built up urban area of Rangiora. Immediately to the east are existing or developing residential areas.

44. The conversion of the Site from present rural lifestyle uses to low density, high quality residential will continue a pattern of outward expansion of Rangiora. Such a change may not be consistent with the PWDP's identification of a Future Development Overlay for west Rangiora only as far west as Lehmans Road, but on the ground it will look and integrate as part of the urban fabric.

45. It will provide some replacement lower density living areas for the existing LLR zones at north west Rangiora – but at much more appropriate higher density that the LLR D1 standard which is 1-2 hh/ha. There are two such areas, shown on the planning maps below. River Road has an 'urban overlay' and is intended to be intensified to urban densities. The land on the opposite (east) side of Lehmans Road is a 'legacy' rural residential zoning which applies under the Operative District Plan. The landowners have developed the adjoining residential subdivision and wish to develop the land for full urban residential development. Services are in place to support this. The constraint to date has been Map A of the CRPS which does not include the land as a Greenfield Priority Area or Future Development Area, GR zoning of this land is consistent with the NPS-UD.

Figure 9: PWDP as notified – LLRZs shown in light grey. Diagonal stripes – urban growth overlay.
Site outlined in red.

46. Rangiora is growing apace. It is attracting significant interest from new home buyers as people respond to the significant investment in upgraded transport links (Northern Corridor and public transport) and a growing economic base for employment within the District and the City.

47. Rangiora has excellent connectivity to the City, both via the new Northern Corridor, and a nascent cycleway link into the City. There is a very regular bus service every half hour.(the No 1 Blue Line) The standard trip takes 70 minutes, and there is a twice daily weekday morning express service from Rangiora, and seven times weekday express out to Rangiora all via Kaiapoi.

48. The Site will step out the western edge of Rangiora, but as it exists in a peri-urban form now, such a change does not alter how the Site interacts with Rangiora as a whole. It is in many ways a functional part of urban Rangiora now; it's only the Zone boundaries and policy framework that create the sense of it not being part of Rangiora.

49. The Site is convenient to the Rakihura/ Ashley recreation trails, the racecourse, Arlington Park, and the airfield. The town centre is easily accessible.

50. The following assessment of the criteria in the NPS-UD for determining a well-functioning urban environment shows that the proposed rezoning will deliver urban, housing and residential outcomes that meet those criteria. There will be a variety of homes enabled by generous lot sizes. The Site is well-positioned, building as it does on an existing township well-serviced by public

transport and cycling options, to provide good accessibility to jobs, community services, and open spaces, as well as mitigating climate change impacts and future natural hazards by being not near the coast and well removed from major rivers.

NPS-UD Policy 1

Planning decisions contribute to well functioning urban environments, which are urban environments that, as a minimum:	**Assessment**
(a) have or enable a variety of homes that: (i) meet the needs, in terms of type, price, and location, of different households; and (ii) enable Māori to express their cultural traditions and norms;	The proposal is to have larger lots supporting predominantly standalone dwellings and associated accessory buildings (including generous sized garaging) in an open landscaped garden setting. This will fill a gap in the range of housing typologies available at Rangiora and contribute to a better functioning urban environment overall at Rangiora. It is not necessary for each individual rezoning proposal to have a wide range of housing typologies, and in some circumstances this may not be appropriate. The rezoning will deliver a premier high amenity urban subdivision with generous sized lots which will complement existing and planned higher density residential development at west Rangiora. There is scope with the relief sought for a mix of residential densities. The appropriateness of this can be considered at the master planning/ODP stage. The Site has the potential to create a unique urban environment in Rangiora. It can follow the example of Palmview based on a lake or Kaiapoi Likes providing a niche housing option in Rangiora and the District meeting a need for residential land not constrained to GRZ standards.
(b) N/A business sectors	
(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and	The Site has access to a collector road and a strategic road providing easy access to key community amenities and facilities. The town is served by a public bus route to the city, and a cycle trail connecting to Kaiapoi and the City. The new West Rangiora Development Area adjoins the Site to the south. The Site will become closer to Rangiora public transport routes as they extend out to service this new growth area over time. The Site is in walking distance to Arlington Park and the Rakahuri/Ashley which contains abundant recreations pace. It is easily accessible to the town centre and within walking distance to the Huntingdon Drive local centre.
(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and	The demand for housing and land in Rangiora is largely ahead of the planning means to respond. This proposal will “top up” the land presently set aside in the PWDP and provide a useful buffer to demand. The Site owners have been keen to release this land for more intense development for some time; there is no prospect of land banking.

(e) support reductions in greenhouse gas emissions; and	The Site has significant advantages in being easily accessible to the town centre and reserves, community facilities and schools. The proposal retains a consolidated form to Rangiora with good connectivity and linkages to recreation space and commercial centres reducing the need for car travel.
(f) are resilient to the likely current and future effects of climate change	The Site is within the area of influence of a major river but the non-urban flood assessment maps do not show extensive flooding likely at the Site. Being inland it is not at risk from climate change induced extreme natural hazard events like sea level rise. or river flooding.

Effects on ecosystems and habitats

51. The Site is currently used for a mix of low intensity (grazing) farming, and lifestyle purposes. Shelter belts and utility buildings have been established
52. The Site has been identified in the PWDP with two ecological overlays (the PWDP ecological overlay – Plains and Low Plains Ecological District). They are a district-wide overlays and no specific ecological values have been identified in the Proposed Waimakariri District Plan. These overlays seek primarily to retain indigenous vegetation. The PWDP identifies SASM 025 nearby the Site. That is a Site and Area of Significance to Maori and in SASM - Schedule 1 is identified as *being River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species.*

Effects on natural and physical resources

53. The Site drains in a SE direction towards the newly developing residential area.
54. There will be a degree of site disturbance as part of creating the roading network, and reserves, and as part of curtilage development on each lot.
55. The proposed use for residential activity inevitably leads to loss of some rural productive potential as land owner intentions are not about farming or productive use of the land, but lifestyle use and enjoyment. Built forms and hard surfaces become more dominant.
56. The Site comprises 4ha bocks now and these are not able to be used effectively for productive purposes other than for intensive productions based on tunnel housing and other supported production systems. None exist in the Site now.
57. The Site contains Class 2 and Class 3 soils as defined in the NZ Land Use Inventory (Landcare Research) Land Use Capability classes 1-3 **(Figure 10)**. Productive use of these soils other than for low level purposes i.e. grazing, is not feasible given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production).

Figure 10: Site soils: Site outlined in red; (Canterbury Maps)
Class 2 soils: bright green/Class 3 soils: light green;

Discharges of contaminants into the environment

58. There will be no discharges of contaminants into the environment. Wastewater will discharge to the Council's reticulated system.
59. Stormwater discharges will potentially be to ground given ground conditions or to an approved and consented stormwater management and treatment area which will meet all relevant Council standards.

Risks from natural hazards or hazardous installations

60. The PWDP planning maps show the Site as being within a Non-Urban Flood Assessment Area.
61. The District Plan maps do not identify high flood hazard areas or high coastal flood hazard areas, rather these are identified through the flood assessment certification process. This enables the most up-to-date technical information to be used. However, as a guide, areas that are potentially high hazard can be identified through the Waimakariri District Natural Hazards Interactive Viewer (NH - Introduction).
62. Rules that refer to a Flood Assessment Certificate require a certificate to be obtained from the District Council to determine

compliance with the relevant rule. The alternative is to apply for resource consent as set out in the rule.

63. Rule NH-R2 states
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;

64. Assessment of flood risk and consequence can be undertaken at subdivision stage.
65. There will be no hazardous installations proposed on the Site.

Geotechnical assessment
66. The PWDP planning maps show the Site as being “Liquefaction damage is unlikely. Standard investigation procedure outlined in NZS3604 is appropriate”.

Contaminated land
67. A Preliminary Site Investigation can be carried out for the Site at subdivision stage.
68. An enquiry of ECAN has identified that two sites at the northern end of the Site potentially contain some contaminated land, which can be investigated further at subdivision stage **(Appendix 6)**. 315 Lehmans Road is an unverified HAIL site (previous use for clay target shooting) and 317 is registered as containing uninvestigated persistent pesticide bulk storage.

Servicing
69. Proposals for servicing the Site and the effects from such servicing in relation to domestic water supply, wastewater, stormwater, roading, and telecommunications will be required for any subdivision consent.

Economic effects
70. It is anticipated that urban development will generate positive economic effects, both from the investigation/development phase and for the longer run economic activity from householders participating in the local economy.

Climate Change effects
71. An assessment of the effects of the proposed rezoning on climate change is included as part of the assessment of a well-functioning urban environment above.
72. A well-functioning urban area that is designed and serviced in an integrated manner, applying sound urban design principles, will enable a reduction in greenhouse gas emissions compared to unplanned, ad hoc development that does not create compact urban forms located where the services and benefits of existing, established urban areas are not readily accessible.
73. There is a triangle of planning influence that can be brought to bear on reducing greenhouse gas emissions
a) Compact urban form minimising distances between homes and work/play options.
b) Proximity of homes to community facilities, services and amenities and business/work areas.
c) Design and provision of movement corridors and linkages that create opportunities other than for vehicles for getting around.
74. The Site of the proposed rezoning:
a) Helps in retaining a compact urban form to Rangiora.
b) Is easily accessible to the town centre and is located convenient to the recreation resources of the nearby Rakahuri/Ashley River, the airfield and racecourse and Arlington Park.
75. Rangiora has excellent connectivity to the City, both via the Northern Motorway, the new Northern Corridor, a cycle way link to Kaiapoi which is linked to the new north city cycle way along the Northern Corridor and a very regular bus service.

Positive effects
76. The proposed rezoning will provide for the continued growth of Rangiora by managing the development through an ODP. The proposal will provide a buffer to on-going high level demand for lots in Rangiora. It will cater for a specific housing need not found in GRZ Zoned land nor LLRZ land. The proposed rezoning is anticipating a form of development that is a much more efficient use of a qualifying site supporting a well-functioning urban area. It is a positive endorsement of Rangiora as a growth node in the District.
77. The benefits derived from a planned ODP approach include facilitating high levels of connectivity, creating community links to identified focal points. The Site is close to recreation facilities. A coordinated and integrated development will provide a

distinctive environmental quality and point of difference to the development.
78. The Site adjoins existing and developing residential development on the western edge of Rangiora.
79. From a community well-being perspective, the provision of additional land for residential growth will continue to support the Council's investment in community infrastructure by maintaining and facilitating growth rates, increasing the rating base and attracting development contributions.

STATUTORY PLANNING ASSESSMENT
80. Submissions must be assessed under the provisions of the RMA, including Part 2 and Section 32 (Requirements for Preparing Evaluation Reports).

National Policy Statements
National Policy Statement on Urban Development Capacity (NPS-UD)

81. The NPS–UD applies to this proposal as it is directed at Tier 1 urban environments, and
Tier 1 local authorities which includes Waimakariri District as part of the Christchurch urban environment that is defined in Table 1 of the NPS, and additionally defined as:
any area of land (regardless of size, and irrespective of local authority or statistical boundaries) that: is, or is intended to be, predominantly urban in character; and is, or is intended to be, part of a housing and labour market of at least 10,000 people.
82. The NPS-UD recognises the national significance of:
a) Having well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future; and
b) Providing sufficient development capacity to meet the different needs of people and communities.
83. The NPS outcomes are to be achieved through objectives that address:
a) Planning decisions improving housing affordability by supporting competitive land and development markets.
b) Regional policy statements and district plans enabling more people to live in areas of urban environments near centres or areas with employment opportunities, area well serviced by public transport or a high demand for housing in the area.
c) Urban environments developing and changing over time in response to diverse and changing needs of people, communities and future generations.
d) Local authority decisions on urban development being integrated with infrastructure planning and are strategic over the medium term and long term.
e) Local authority decisions on urban development are responsive particularly for proposals supplying significant development capacity.
f) New Zealand's urban environments support reductions in greenhouse emissions and are resilient to current and future effects of climate change.
84. The key method to achieve these objectives is by development of a Future Development Strategy (FDS). This will set out how the Councils will provide for sufficient development capacity over the next 30 years to meet expected demand. There is no FDS for the greater Christchurch Urban Area that meets the requirements of the NPS-UD.
85. Work on development capacity completed for the NPS - UDC 2016 by the Greater Christchurch Partnership as an Update of the existing Urban Development Strategy (UDS) – Our Space 2019 confirmed what there was a shortage of feasible development capacity for future housing in Waimakariri District for the medium (next 10 years) and long term (10 to 30 years) periods. That assessment is now out of date as it does not address the requirements of the NPS-UD; and rates of take up of land have exceeded projected rates.
86. One of the key changes in the NPS-UD is that local authority decisions on urban development that affects urban environments are responsive, particularly to proposals that would supply significant additional capacity. It also amends the required methodology for housing and business capacity assessments.
87. The current CRPS does not meet the new NPS-UD requirement in relation to proposals for significant additional capacity. Regional councils are required to include criteria in the RPS to determine what plan changes will be treated for the purposes of Policy 8 as adding significantly to development capacity as soon as practicable. ECAN has yet to respond to this requirement.
88. The NPS-UD has immediate effect, so in the meantime, proposals such as this submission must be assessed in the context of the overall intent and purpose of the NPSUD as articulated in the NPS-UD objectives and policies. This includes that NZ has well-functioning environments; provides sufficient development capacity to meet the different needs of people and communities; planning decisions improve housing affordability to contributing to competitive house and land markets; and RMA plans enable more people to live near major employment areas, where there is existing or planned public transport, and where there is high demand for housing.
89. The NPS-UD is the higher order document and its requirements override those of lower order documents where there is a conflict, including regional and district RMA plans.
90. Key objectives and policies in the NPS-UD are assessed here:

NPS-UD Objective/Policy	Assessment
Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	The proposed development will further enable Rangiora to sustain itself as a well-functioning urban environment by consolidating the residential area close to the town centre, and provide residential development close to public transport links and existing community and commercial facilities including Huntingdon Drive local centre.
Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.	The proposal provides choices in the Rangiora housing market and in doing so supports housing affordability. Whilst the proposal is for a premier larger lot urban residential development, it is important that all sectors of the market are catered for. This will be more affordable than forcing those wanting large sections out to the much larger and very limited areas of LLR D1 development, or having to purchase 2-3 sections in a standard residential subdivision. There Site is in multiple ownership and the landowners are working together to achieve the rezoning. It will bring more competition into the market by bringing new entrants into the market.
Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply: the area is in or near a centre zone or other area with many employment opportunities the area is well-serviced by existing or planned public transport there is high demand for housing or for business land in the area, relative to other areas within the urban environment.	The CRPS is due for review in 2024 but in the meantime the existing CRPS is not in accordance with the NPS-UD 2020. The proposed rezoning is on the edge of the District's largest centre, which offers a wide range of community and business services, and employment opportunities. It is expected that a proportion of future residents will commute outside the township, but as the township and associated business areas e.g. at Southbrook, continue to grow, this is expected to become proportionally less. Rangiora is well serviced with public transport, there is scope for future mass transit PP, and there is a high demand for housing at Rangiora. The Site adjoins the new West Rangiora Development Area, to the south. Extensions of public transport to service this growth area will be readily accessible to the Site.
Objective 6: Local authority decisions on urban development that affect urban environments are: integrated with infrastructure planning and funding decisions; and strategic over the medium term and long term; and responsive, particularly in relation to proposals that would supply significant development capacity.	Whilst not currently identified as a future growth area in RMA documents, the Site is well placed at the township edge to be serviced by existing infrastructure. Some upgrades may be required, which will be investigated further with Council prior to the hearing. See Policy 8 below for commentary on proposals which supply significant development capacity
Objective 8: New Zealand's urban environments: support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change	The proposal adjoins the existing built up are of Rangiora, close to public transport links. Its excellent accessibility to Christchurch City, substantially enhanced with the new Northern Motorway extensions, means it is now highly accessible to these nearby major employment areas. Travel distances are relatively short, minimising vehicle miles and the potential for greenhouse gas emissions. There is a cycleway link from into Christchurch City, and regular bus services, including an express route. The Site is inland and not subject to natural hazard risks associated with sea level rise arising from climate change.

Policy 1 – Planning decisions for well-functioning urban environments	Assessed at para 41-50
Policy 2 - Sufficient development capacity Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.	The proposed rezoning is anticipated to provide sections that will be available for the short term (up to 3 years) and into the medium term (3-10 years) if adopting a more conservative outlook. The locational and amenity advantages of Rangiora also favour strong ongoing demand. The PWDP UFD-O1 Feasible Development Capacity for residential activities identifies the need for 6300 residential units in the period 2018-2028, and 7100 residential units 2028-2048. These numbers are derived from Chapter 6 CRPS Table 6.1. and are out of date. Data from the Council (November 2021) confirms that there are about 800 vacant lots in Rangiora. Building consents are at about 180/year. That means there is about 4 years vacant land supply. A lead in time of 3-5 years is needed to go from rezone to house build so the Council is facing an unnecessary squeeze on land availability. That will translate in to an upward shift in land and section prices as has been the case at Rolleston. The data suggests that the PWDP will be late to the party to ensure there is at least sufficient development capacity to meet expected demand for housing land over the short term, medium term, and long term. There is a looming, inevitable land supply issue so any proposal to add capacity will push the Council closer to meeting the requirements of the NPS-UD. The proposal is consistent with ensuring there is at least sufficient land supply for housing.
Policy 8 – Responsiveness to plan changes Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is: (a) unanticipated by RMA planning documents; or (b) out-of-sequence with planned land release	The proposed rezoning is not anticipated by RMA documents - it is not a Greenfield Priority or Future Development Area in the CRPS, or a New Development area in the PWDP. A responsive approach to the proposal is required as it meets the Policy 8 criteria for unanticipated zoning. It will contribution to well functioning urban environments and will add significant development capacity. There is no development capacity for the housing typology proposed – so any provision is significant in this context. The development will deliver appx 311 high amenity large lot residential sites at an average density of 1500m2. This will be higher if a mix of densities are proposed, which may be appropriate in some parts of the Site, dependent on master planning work to follow.

91. Adopting the submission to re-zone the land, and enable the proposed development on the submission Site will satisfy the objectives and policies of the NPS-UD.

Proposed National Policy Statement for Highly Productive Land (NPS-HPL)

92. The Government proposed in 2019 a NPS-HPL to prevent the loss of productive land and promote its sustainable management. The overall purpose of the proposed NPS-HPL is to improve the way highly-productive land is managed under the Resource Management Act 1991 (RMA) to:

a) Recognise the full range of values and benefits associated with its use for primary production

b) Maintain its availability for primary production for future generations
c) Protect it from inappropriate subdivision, use, and development.

93. The NPS-HPL is still a proposal and not intended to take effect until after Gazettal. At the date of this submission the NPS-HPL has no effect and no assessment of it is required for the purposes of this submission.

94. The Proposed NPS-HPL interim definition of HPL is land defined as Land Use Capability Class 1-3 soils. A portion of the Site contains Class 2 and 3 soils (see **Figure 10)**. Highly productive use of these soils is not realistic given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production). Its present use as lifestyle blocks, low level grazing and agistment is the more likely long run use of the Site if not rezoned.

95. Objective 3 of the Proposed NPS-HPL specifically refers to highly productive soils being protected by avoiding *"uncoordinated urban expansion on highly productive land that has not been subject to a strategic planning process"*. The Site was assessed through a strategic planning process (WDDS 2018) and the RRS as a preferred site for LLRZ development, and rejected for a change in zoning on the basis that it may be required for long term urban growth of Rangiora.

96. It is therefore considered that this submission to re-zone the Site is largely in accordance with the Proposed NPS-HPL.

National Planning Standards

97. The National Planning standards prescribe various matters under the RMA so that there is consistency among planning documents most relevantly here in terms of appellations for zones, and the standards applying to these zones.

98. The proposed rezoning adopts the standard zone appellation, in this case LLRZ as contained in the PWDP.

99. The PWDP identifies plan standards for minimum and average net site areas for the respective zones. These are modified for the proposed rezoning as a higher density LLRZ.

100. The higher density LLR zoning is entirely consistent with the NPS purpose for the LLRZ as reproduced below. In this case, the principal constraint to more intensive development is the peri-urban location where a lower density transition to the rural environment is appropriate (particularly noting that the zone boundary is 'mid block' so there is no natural or physical buffer between rural and residential areas); the existing pattern of 4 ha lots with existing substantial homes and gardens; and the fact that the premier large lot subdivision proposed relies on consistency of housing quality and character to be deliver on this vision for the area.

Large lot residential zone

Areas used predominantly for residential activities and buildings such as detached houses on lots larger than those of the Low density residential and General residential zones, and where there are particular landscape characteristics, physical limitations or other constraints to more intensive development.

Low density residential zone

Areas used predominantly for residential activities and buildings consistent with a suburban scale and subdivision pattern, such as one to two storey houses with yards and landscaping, and other compatible activities.[2]

Canterbury Regional Policy Statement 2013 (CRPS)

101. Chapter 6 of the RPS *"provides a resource management framework for the recovery of Greater Christchurch, to enable and support recovery and rebuilding, including restoration and enhancement, for the area through to 2028. Recovery in Greater Christchurch is also supported by the provisions in Chapter 5 notated as 'Entire Region'. The provisions in the remainder of the RPS also apply.3"*

102. An assessment of the proposed rezoning against the relevant CRPS Objectives and Policies is set out in **Appendix 1**. This should be read in the context of the CRPS being overdue for review and that it does not provide a regional response to the NPS-UD. The
need to focus on earthquake recovery has now passed and so many of the directive provisions need to be given appropriate 'weight' in a new national policy environment with a focus on flexible, responsive panning approaches that better provide for people's needs and well-being.

103. That assessment shows that

a) The development proposal achieves the objectives for the location, design and function of new developments (Objective 5.2.1)

b) The traffic effects of the proposal are unlikely to give rise to adverse effects and so achieves CRPS objectives for the strategic land transport network (Policy 5.3.7)

c) The Site falls outside the FDAs shown on Map A of Chapter 6 and in that regard is inconsistent with RPS Policy 6.2.1 clauses 1 to 3.

1. identifies priority areas for urban development within Greater Christchurch;

2. identifies Key Activity Centres which provide a focus for high quality, and, where appropriate, mixed-use development that incorporates the principles of good urban design;

3. avoids urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS

d) The environmental effects assessment outlined above establish that the proposed development is consistent and will not

give rise to any concerns with respect to all the matters listed in RPS Policy 6.2.1 clauses 4. to 11. These matters are:

6.2.1 Recovery framework

Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that:

1. As above;

2. As above;

3. As above;

4. protects outstanding natural features and landscapes including those within the Port Hills from inappropriate subdivision, use and development;

5. protects and enhances indigenous biodiversity and public space;

6. maintains or improves the quantity and quality of water in groundwater aquifers and surface waterbodies, and quality of ambient air;

7. maintains the character and amenity of rural areas and settlements;

8. protects people from unacceptable risk from natural hazards and the effects of sea-level rise;

9. integrates strategic and other infrastructure and services with land use development;

10. achieves development that does not adversely affect the efficient operation, use, development, appropriate upgrade, and future planning of strategic infrastructure and freight hubs;

11. optimises use of existing infrastructure; and

12. N/A

e) The proposed rezoning achieves policies relating to:

- Sustainability;
- Integration of transport infrastructure and land use;
- Urban design; and
- Biodiversity, natural hazards, landscape, soils, contaminated land.

104. In terms of the CRPS polices for rural residential developments (Policy 6.3.9) the proposal sits square with all policy matters other than being a location identified in an adopted Rural Residential Strategy; and being at a higher density than provided for under this policy (ie greater than 1-2 hh/ha). As such it has a majority of features entirely consistent with the policy.

105. The CRPS includes housing capacity targets as below

6.2.1a Targets for sufficient, feasible development capacity for housing [inserted in accordance with sections 55(2) and 55(A) of the Resource Management Act 1991, from the National Policy Statement on Urban Development Capacity 2016]

For the period 2018-2048, sufficient, feasible development capacity for housing is enabled in Greater Christchurch in accordance with Table 6.1.

Table 6.1 Targets for housing development capacity in Greater Christchurch, 2018-2048

106. These derive from Our Space, under the requirements of the then NPS-Urban Development Capacity 2016, since replaced by the NPS-UD 2020. The targets (known as bottomlines in the NPS-UD) are to be treated as ‘minimums’ not ‘maximums’.

Policy 6.3.12

enables urban development in the Rangiora and Kaiapoi FDAs (new Development Areas in the PWDP) where needed to meet the medium term targets. This a ‘minimum’ allocation approach contrary to the NPS-UD. The NPS-UD favours over allocation, including in locations unanticipated by RMA plans, where it will add additional development capacity, can be integrated with infrastructure planning and funding, and will contribute to well functioning urban environments – as is the case the proposed Lehmans LLR D2 zone.

107. The proposed Lehmans LLR D2 zone is consistent with the CRPS except with respect to those parts of the CRPS which are out of step with and do not give effect to the higher order plan, the NPS-UD.

Proposed Waimakariri District Plan

108. An assessment of this proposal against the relevant PWDP Objectives and Policies for urban growth and development as notified on 17 September 2021 is set out in **Appendix 2.**

109. That assessment shows that the proposed rezoning is entirely consistent with the relevant objectives and policies, including as sought to be amended by this submission. Those amendments are to UFD-P3 Identification/location and extension of Large Lot Residential Zone areas; and LLRZ-O1 and LLRZ- P1-5 and reflect the intent and outcomes intended for the proposed LLRZ D2 zone, which is a higher density LLRZ zone than the PWDP LLRZ zone (renamed LLRZ D1 in this submission).

ASSESSMENT AGAINST OTHER PLANNING DOCUMENTS

Our Space 2018-2048 Greater Christchurch Settlement Update (2019)

110. Our Space is a non-statutory document prepared under the Local Government Act. It

"responds to the new Government Policy Statement on Land Transport, which has increased funding for mass public transit schemes, and meets the requirement of the National Policy Statement on Urban Development Capacity (NPS-UDC) 2016 to prepare a

future development strategy…. Specifically, it:

• sets out how targets for housing for the next 30 years will be met, accommodating an additional 150,000 people;

• identifies locations for housing growth, encouraging Central City and suburban centre living while providing for township growth in Rolleston, Rangiora and Kaiapoi;…

• promotes a compact urban form, which provides for efficient transport and locates development in a manner that takes into account climate change and sea level rise.[4].

..Underpinning this settlement pattern approach is the vision for a transformation of the transport network that fosters much greater public and active transport usage, and reduced reliance on the private vehicle.

111. Our Space acknowledges that this will require commitment from the Government to invest in the necessary improvements to our transport system, which could include investing in rapid transit services. To date, there has been no successful business case for improved public transportation, including not as a Covid 19 fast track infrastructure project.

112. The Our Space housing capacity targets (Table 3) and Future Development Areas are related to growth of urban areas.

113. Our Space, like the CRPS (and the Operative District Plan) are now out of date, as they do not reflect or give effect to the new requirements of the NPS-UD.

Waimakariri 2048 District Development Strategy (WDDS)

114. The preferred growth directions for Rangiora in the WDDS 2048 (2018) are outlined above (under 'Site') i.e. westwards to Lehmans Road, and otherwise eastwards. However, the Council in its decision on the RRS, recognized west of Lehmmans Road as a potential longer town urban growth area.

115. The WDDS Rangiora Snapshot (pp38-39) -when looking ahead to 2048 proposed that:

a) Rangiora remains the District's largest town
b) 30,000 – estimated population (2048)
c) 12,025 – estimated households
d) 5,025 - new households in Rangiora
e) Continues to accommodate one third of the District's residential growth
f) 167 – estimated annual building consents for new dwellings for the next 30 years
g) 423 hectares of additional feasible residential land required by 2048 (this includes capacity in remaining stages of existing residential developments as well as new greenfield areas inside and outside of the Infrastructure Boundary)
h) Future residential growth directions proposed to the east (predominantly) and west of the current town
i) Opportunities for intensification/regeneration to be identified
j) New growth directions take into account areas of unacceptable natural hazard risk and areas of significant environmental and cultural values
k) New growth areas to connect into existing sewer and water networks
l) Stormwater Levels of Service designed to meet increased performance requirements

116. At the 2018 Census Rangiora had a population of 17,841, and 7314 total dwellings (incl those unoccupied and under construction). Population projections for the District show an average annual change 2018-2020 of 1700 persons. If Rangiora continues to attract a third of all district growth as stated in the WDSS then Rangiora's population in 2021 will be around 18,900.

Mahaanui Iwi Management Plan

117. Part 1 of the PWDP in a section "Mana Whenua" sets out the position with respect to iwi and the review of the district Plan:

*a) The District's territorial area sits within the takiwā (territory) of Ngāi Tūāhuriri which is one of eighteen Ngāi Tahu regional papatipu rūnanga, constituted under the **Te Rūnanga o Ngāi Tahu Act 1996** to represent **mana whenua** interests.*

b) The preparation and change of a district plan must take into account relevant iwi documents. For the District, Ngāi Tahu has set out its resource management values, issues, objectives and policies within the Mahaanui Iwi Management Plan (2013).

c) The Mahaanui Iwi Management Plan identifies objectives, issues and policies for natural resource and environmental management for six pāpatipu rūnanga (including Te Ngāi Tūāhuriri Rūnanga). It seeks to ensure that the taonga and resources of Ngāi

Tahu mana whenua are recognised and protected in the decision-making of statutory agencies. The Mahaanui Iwi Management Plan contains a comprehensive suite of policies and objectives addressing the range of resource management matters of significance to tangata whenua. The District Council shall have regard to the Mahaanui Iwi Management Plan when preparing or changing the District Plan, to the extent its content has a bearing on resource management issues of the District.

118. The Mahaanui Iwi Management Plan (MIMP) 2013 was released on 1 March 2013.

119. The MIMP is a tool for tangata whenua to express their identity as manawhenua and their objectives as kaitiaki, to protect their taonga and resources, and their relationships with these. The MIMP seeks to ensure that these taonga and resources are recognised
and protected in the decision-making of agencies with statutory responsibilities to tangata whenua. Importantly it is also a tool that assists Papatipu Rūnanga representatives to articulate their values, issues and policy into statutory processes.

120. The MIMP includes both general objectives and policies about the management of land, air, and water, and also includes catchment specific objectives and policies.

121. Section 5.3 Wai Maori (pp77-98) contains an extensive discussion about tangata whenua rights and interests in freshwater. It provides a suite of Issues, Objectives and Policies for freshwater

122. Section 5.4 Papatuanuku (pp101-124) sets out the Ngai Tahu Subdivision and Development Guidelines that are to be read along-side objectives relating to:

a) Land use planning and management in the takiwā reflects the principle of Ki Uta Ki Tai. (from the mountains to the sea)

b) Rural and urban land use occurs in a manner that is consistent with land capability, the assimilative capacity of catchments and the limits and availability of water resources.

c) Inappropriate land use practices that have a significant and unacceptable effect on water quality and quantity are discontinued.

d) Ngāi Tahu has a prominent and influential role in urban planning and development.

e) Subdivision and development activities implement low impact, innovative and sustainable solutions to water, stormwater, waste and energy issues.

123. Section 5.5 Tane (pp127-137) includes objectives that focus on:

a) Regional policy, planning and decision making in the takiwā reflects the particular interest of Ngāi Tahu in indigenous biodiversity protection, and the importance of mahinga kai to Ngāi Tahu culture and traditions.

b) The customary right of Ngāi Tahu to engage in mahinga kai activity is recognised, protected and enhanced…

c) Customary use, and therefore mahinga kai, is given effect to as a first order priority for freshwater management in the takiwā.

124. Section 6.4 (pp213-224) addresses issues of particular significance to the lands and waters of the Waimakariri catchment within which the Site lies.

125. Relevant Objectives relating to urban development of land in that catchment include:

a) The natural “energy, vitality and life” of the Waimakariri River as a braided river is protected and restored.

b) The discharge of contaminants to the Waimakariri and its tributaries is eliminated.

c) Water quality and flows in the Waimakariri and its tributaries are improved to enable whānau and the wider community to have places they can go to swim and fish.

d) The mauri and mahinga kai values of the Waimakariri and its tributaries and associated springs, wetlands and lagoons are protected and restored; mō tātou, ā, mō kā uri ā muri ake nei.

126. A key issue relating to subdivision and development is that subdivision and development activities in the lower catchment have the potential to adversely affect Ngāi Tahu values such as waterways, mahinga kai and sites of significance (Issue Wai4).

127. The proposal provides for full urban reticulation of the three waters and is consistent with the objectives and policies contained in Chapters 5.3 and 5.4 of the MIMP. The proposal does not preclude individual land owners from installing rainwater collection and use from roof areas at the time of building development.

128. The proposal has been designed taking into consideration the potential effect of resultant subdivision and development on the rivers and streams that flow into the lowland rivers.

129. Overall it is considered that the proposal will not have adverse impact on the cultural values of iwi as set out within the MIMP.

SECTION 32 ASSESSMENT

130. A Section 32 assessment is contained in **Appendix 3.**

131. In summary, the PWDP zoning and associated rules (RLZ Zone with a minimum lot size for subdivision and a dwelling 4ha) do not meet the needs and aspirations of the current owners.

132. Strategic Council planning documents (specifically the WDDS) have a focus on only meeting urban growth demands within urban environments of existing towns. They favour intensification (15hh/ha) and a strict allocation of capacity by development areas. It is a control and command regime consistent with Map A of Chapter 6 of the CRPS but is out of step with the requirements of the NPS-UD which requires a more flexible, responsive approach, prohibits a hard fixed unmoveable urban/rural boundary.

133. This approach leaves little room for new proposals or proposals that do not sit square with the standard array of GRZ/medium density or SETZ (Settlement Zone). SETZ applies to some of the District's smaller settlements outside Greater Christchurch.
134. Neither LRZ nor Large Lot Residential (LLRZ) as notified in the PWDP is an efficient use of this block of land located as it is immediately adjoining the urban area of Rangiora, and in a location easily accessible to the town centre by active transport modes as well as car and several district reserves.
135. If this Site is not zoned for LLRZ D2 (minimum average lot size 1500m^2) use to enable residential re-development then it will drive pressure to re-zone elsewhere. That step potentially will not have the significant benefits to Rangiora long term in relation to enabling a well-functioning urban environment that enables people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future. Additionally re-zoning to LLRZ D2 will contribute to providing additional development capacity to meet the different needs of people and communities in a planned manner and consistent with the NPS-UD.
136. The Site can readily be developed to reflect the principles of the Urban Design Protocol with values of character, context, and connectivity.
137. The Section 32 assessment concludes that the proposal to re-zone the Site from LRZ zone to LLRZ D2 Zone (average lot size 1500m^2) is the most appropriate method for achieving the objectives of the proposal, than the other alternatives considered.
138. Option 2 identified in the s 32 assessment is consistent with some PWDP policies notwithstanding that it does sit square with the strategic intentions signaled in the WDDS and the PWDP approach to providing for development capacity and urban development.
139. Option 2 identified in the s 32 assessment to re-zone the Site is the most appropriate given:
a) The proposals adopt the PWDP zones, development and activity standards with appropriate amendments. This ensures continuity of the District Plan anticipated environmental outcomes and urban amenity for Rangiora and adjoining residential areas;
b) Will be consistent with and give effect to many of the relevant PWDP objectives and policies;
c) It is a logical extension to the developed and developing residential land adjoining the Site while achieving a compact, efficient urban form that removes pressure on isolated rural land elsewhere around Rangiora.
d) It gives effect to the NPS-UD, specifically Objective 6 c) and Policy 8, delivering significant additional development capacity and contributing to a well functioning urban environment.
e) It is assumed that there will be capacity in the public utilities and the existing road network, including planned upgrades, to accommodate the traffic effects of the redevelopment;
f) The proposed Site specific ODP will provide certainty of the final form and disposition of the re-zoned area including its proposals for reserves, roading, future linkages for pedestrian and vehicular traffic.
140. The re-zoning proposal is considered to be appropriate to achieve the sustainable growth and development of Rangiora.
141. The economic, social and environmental benefits of the proposed rezoning outweigh any potential costs.
142. The overall efficiency and effectiveness of the proposed rezoning (Option 2) is high, in comparison to the alternative options set out in the s 32 Assessment which are low (Options One and Four) or low to moderate (Option Three).
143. The PWDP proposes to release land for development in the new Development Areas at Rangiora and Kaiaipoi through a novel and untested certification process that is not clearly derived from RMA statutory powers, nor Local Government Act 2002 (LGA) authority. This approach is not proposed for the LLR Overlay areas. As the proposed Lehmans Road LLR D2 zone proposed by this submission seeks large lot urban densities, it is anticipated that Council may favour the certification process if it accepts the proposed rezoning. This is opposed – rezoning to LLRZ D2 is sought.
144. Potential difficulties with the proposed certification process are identified and discussed in the Section 32 Assessment. (**Appendix 3)**. In summary, the process is hugely discretionary, does not provide conventional rights to an applicant (eg right of objection/appeal) meaning decisions cannot be challenged, and it is not apparent that the process will be appropriately documented with a transparent record of the decision-making within the certification process. Further uncertainty arises in the practicalities of how to negotiate and manage the staging, funding and building of key infrastructure across a range of Sites, and a risk that land supply is controlled by a limited number of large developers. It is a far less efficient and effective method for delivering land for housing than the Council rezoning the land in the PWDP.
145. The proposed rezoning is considered to be the most appropriate, efficient and effective means of achieving the purpose of the RMA.

CONSULTATION

146. The landowners and their consultants have submitted on the WRRS and the WDDS (**Appendix 4)**.
147. The submissions to re-zone as rural residential or identify the Site as suitable for LLRZ have been rejected as noted above. LLRZ but at higher densities as now proposed is considered to be a more efficient use of the land and better meets market demand. 5000m^2 sites provide more land is needed for a spacious home and garden.
148. The landowners have been consistent in their wish to find a zone and possible land uses better suited to their needs.

CONCLUSION

173 The submission seeks to rezone 58 ha of land adjoining Rangiora from Lifestyle Rural Zone (LRZ) to Large Lot Residential with a specific density standard (LLRZ D1), minimum average lot size 1500m^2.
149. The Site has a long history of rural lifestyle use. It is not significantly restricted by potential natural hazards especially flooding, nor does it have physical limitations for development for residential purposes as it is not liquefaction prone, and has no known geotechnical limitations but does contain an area of LUC 2 soils. It is near a site of significance to iwi (SASM – 025) being the Rakahuri/Ashley River The Site has access to a collector road and is near to a strategic road giving direct access to the town centre and a range of community amenities and facilities.
150. The Site immediately adjoins the urban area of Rangiora, and is well located to join in to Council utility services. It is well suited for conversion to residential use.
151. The Site is not identified within the westward growth direction for Rangiora in the District Development Strategy 2018 nor is it part of the DEV-WR development area which adopts Lehmans Road as its western boundary. It is in a location that achieves coherent and compact urban form offering ease of access to business services, community facilities, reserves and the primary road network.
152. The proposed rezoning provides for a connected and high amenity residential living environment not presently available under the PWDP while avoiding and/or mitigating any potential adverse effects on the environment. It will provide for continuing high demand for a variety of high quality residential sections aimed at a particular segment of the housing market in an ideal location, easily accessible to the existing town centre services and facilities. It will broaden the range of housing available. As such, it is consistent with the NPS-UD including Objective 6c) and Policy 8, to be responsive to proposals which supply significant development capacity and contribute to a well functioning urban environment.
153. The use of this Site for residential purposes can be a sustainable and efficient use of land and infrastructure. The proposed rezoning better provides for the social, economic, environmental well-being of the landowners and the Rangiora community than continuation of the current low intensity lifestyle land use on 4ha blocks, or a conventional LLRZ residential use.
154. Any potential adverse effects of the implementation of the proposed rezoning can be assessed at subdivision stage but there has been no restriction on servicing the blocks to date. Capacity will need to be confirmed for infrastructure, power and road network. Any future subdivision of the Site will need to confirm water supply and wastewater treatment and disposal options.
155. Rezoning of the site to LLRZ zone is not inconsistent with the policies and objectives of the PWDP, but it is at odds with the dated CRPS approach to provision of urban growth and housing capacity for Greater Christchurch, to the extent that it is not within an FDA created by Change 1 to the CRPS and is not identified as an LLRZ site under the strategic RRS prepared by the Council.
156. As the proposal helps achieve the purpose of the RMA, and has been shown to be consistent with the relevant provisions of the NPS-UD, the submission can be accepted by Waimakariri District Council.

Original Submission

Summary Reasons for the Submission

The reasons for our submission are outlined below.
a) The preferred relief (**the proposed rezoning**) is both appropriate and necessary to achieve sustainable growth and development of Rangiora and the District and meet the requirements of the National Policy Statement for Urban Development 2020 (**NPS-UD**).
b) The Site identified in Figure 1 and at para 1 of the Preferred Relief above is a logical and preferred location that lends itself to a specific type of housing development not provided within the PWDP as a residential option adjoining but outside the existing urban areas. Nowhere is it possible to develop in a comprehensive, coordinated way a low density, high quality residential environment in the District's towns, the Rural Lifestyle Zone or Settlement Zone as a permitted activity.
c) The requirement for 12/15 hh/ha in GRZ zones (the majority of land in urban areas) drives development to modern scale relatively small urban lots best produced as a package across a significant land holding. The GRZ subdivision standards do not provide for the needs of people who seek a generous sized urban lot residential setting. This is a housing sector that is running against the planning tide of intensification but is, nonetheless, a legitimate form of housing in an appropriate setting. The barriers to such development in urban areas requires an appropriate setting/ location in the rural areas but close to or adjoining the urban areas and at a much lower density than is desired or appropriate (the PWDP LLRZ) to meet the housing needs for generous sized urban lot residential living..
d) The PWDP subdivision standards for LLRZ require lots that are very large for those whose primary interest in a rural setting is a form of residential living, not one that requires significant maintenance and management often involving animals or machinery at scale. Conversely, the GRZ subdivision standards do not provide for the needs of people who seek a large lot residential setting

e) The focus in the PWDP is on prescribing a limited range of residential options and tightly controlling and constraining housing choice within those options. Further urban growth is also tightly constrained and controlled around DEV areas around Rangiora and Kaiapoi but for a very specific form of residential development driven off density requirements that do not match the needs of all landowners.
f) The focus in most new District Plans, driven in part by the National Planning standards, is to simplify the range of zones, to standardize lot sizes, to supposedly create efficiency and certainty through ease of administration of the District Plans. This is done by constraining housing and land development choices by lot size, by location, by built standards and the disposition of built/open elements in a site. However, the National Planning standards do provide for large lot urban residential living, a residential living option which has not been taken up the PWDP (due most likely to the restrictive provisions of the CRPS which only prescribe one from of lower density residential living, at a density of 1-2 hh/ha).
g) This planning approach may be a standard approach to resource allocation but it does not provide a flexible, responsive approach to innovative and new development options. The Government is creating policy settings that on one hand seek intensification in urban areas, while at the same time pushing away from a land allocation model of planning. The PWDP in striving to face both policy directions has a package of measures that are in fact a major barrier in terms or cost, timeframes and certainties for proposals that are not cut from the suite of housing and development options set out by the PWDP. The allocation of land in preferred development areas, it must be said, runs counter to the Government's push, and now its direction, to free up land for development, to encourage innovation in housing (presently with a focus of intensification) and to make available a range of responses to the need to meet the housing needs of people and communities set out in the NPS-UD.
h) While the weight of demand (and the planning response) is around affordable housing, around small lots and dense development that supports investment in public facilities and amenities such as public and active transport, reserves, and commercial services, there is always a wide spectrum of preferences at play in the housing market. The demand for high quality, generous houses set on generous sized parcels of land within high amenity settings is an important and no less relevant housing sector. There is a strong unmet demand, as confirmed by advice from Bayleys real estate (**Appendix 5**) for larger family homes with room for a pool or similar. Purchasers want to be close the amenities of Rangiora and within walking and cycling distance of local schools. They do not want the only available options – a 4 ha lifestyle block or 5000m^2 rural residential site at Mandeville or Ohoka.
i) Interestingly enough for a nation built on the so-called quarter acre paradise, recent policy and planning interest in housing and land development has now seemingly positioned the 1011m^2 section as a luxury item, as the antithesis of providing for community well-being and needs. It is as though the old quarter acre of itself acts against building a sense of community despite being able to be developed in a planned, structured, coordinated or integrated manner. Rather than being a frivolous discretionary item in land development
and housing choice, a well-planned, well located and properly serviced low density residential environment has much to offer urban environments. They can be tactically used to provide shape and edge to urban areas, they can provide a mass of amenity different from (and potentially complementary to), but no less legitimate in urban outcome terms, to conventional GRZ zoned land.
j) In many ways the approach of a district plan to the role and place of the old quarter acre is not dissimilar to the issues faced by comprehensive retirement villages when first proposed. The idea of dense, almost gated and self-contained communities, with multi storey buildings also did not sit well in many district plans. But now they are accepted as an important part of the urban fabric catering to a specific demographic and health demographic. Most plans enable them.
k) Provision for low density residential in an urban setting, or failing that likelihood, in an adjoining rural zone is a fundamental gap in the district plan.
l) The submission seeks to provide for another housing typology not provided in the PWDP and in a location with significant planning merit. The planning case was made out in a detailed submission to the proposed Rural Residential Strategy (**RRS**) for the land identified in this submission to be "reserved" for conventional Rural Residential zoning in the review of the District Plan. That submission was rejected in favour of a decision ascribing an unspecific strategic significance to Lehmans Road as the urban boundary; simply the decision was that rural residential development here would preclude this area as a future urban growth path, even though this was likely to be very long term as the Waimakariri District Development Strategy (WDDS 2018) for the period up to 2048, does not favour urban growth west of Lehmans Road.
Officer Recommendation
Continue to exclude the area west of Lehmans Road and the racecourse land at Rangiora as growth areas as these were originally considered but not included in the draft RRDS as they trigger the key preliminary criteria of: being on the direct edges of a main town
outside of the Projected Infrastructure Boundary (PIB) thereby foreclosing more intensive long-term urban development, and…

Panel Recommendation
The panel accepted the officer recommendations to exclude areas on the fringes of Rangiora in the final RRDS due to these having the potential to foreclose more intensive long-term urban development of the town.

m) In light of the above decision on the Waimakariri Rural Residential Strategy, the proposal now is for a form of high amenity low density urban zoning, which whilst in demand is entirely absent from the PWDP. This will be a long term urban form of development. The proposal set out in the submission will achieve a compact, and efficient, urban form on the edge of Rangiora with excellent connectivity by multiple transport modes. It provides for continuous urban development by enabling a built form which can act as a strong zone or urban boundary.

n) The proposed rezoning will accommodate approximately 311 LLRZ lots1 at the proposed amended density standards for LLRZ D2 (average size 1500m^2). It will contribute to a well-functioning urban environment, meeting the NPS-UD Objective 6(c).
o) Any adverse effects on the environment arising from the proposed rezoning will be minimal, if any, and can be adequately mitigated. A high amenity master planned development is proposed.
p) Significant positive effects arise from the proposed rezoning. It will enable the short term housing demand at Rangiora to be met, and can deliver a housing typology for which there is demand, on lots that are not a burden to the landowners (which is the case for 4ha and the very limited areas of LLRZ D1 with a density of 1-2 hh/ha) and for which there is no provision in the PWDP. At present rates of land uptake there is about 4 years vacant land supply in Rangiora. Given it takes 3-5 years to bring land from zoned state to on the market as developed lots, there is some urgency in providing additional capacity. This proposal helps address an anticipated shortfall in residential zoned plan enabled land.
q) There is no additional cost to the Council in re-zoning the Site as there is expected to be capacity in the public utilities and the existing road network, including planned upgrades.
r) Amendments to PWDP objectives and policies may be necessary to provide for a higher density LLRZ, but of themselves will not act against those relating to Strategic Directions Urban Form and Development and Urban Growth. The PWDP approach to zones and identification of future development land is already out of step with higher order Resource Management Act 1991 (RMA) statutory documents because they do not give effect to the NPS-UD (and are sought to be amended through this submission).
s) The alternatives of retaining Rural Lifestyle or Large Lot Residential zone across the entire Site are not an efficient use of land which immediately adjoins the urban area of Rangiora, and is highly accessible to the town centre by active transport modes as well as car.
t) The proposed rezoning is consistent with and the most appropriate, efficient and effective means of achieving the purpose of the RMA.

The Site
1. The Site is a 58ha block of land ('the Site') accessed from Lehman Road, Rangiora **(Figure 1)**. It is owned by the two submitters and 12 other landowners.

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1 Assumes 20% of land area taken for servicing including roading, reserves and stormwater management if required.

Figure 1: The site (outlined in blue (Google Earth)

2. The Site is surrounded by RLZ land that is used for a mix of lifestyle and conventional farming. To the NE is the Rangiora Eco Holiday Park, and beyond the Park is the Rangiora Racecourse about 300m away from the nearest lot and 1km from the centre of the Site. Land to the south east is GRZ and part of urban Rangiora with newly developing residential land west of West Belt. About 1.9 km to the NW is Rangiora Airfield. About 1km north of the most northern lot is the Ashley River.
3. The southern-most lot in the proposal with the Rangiora Vet Clinic faces, but does not have access to Rangiora-Oxford Road (State Highway 72). This arterial road provides the main road connection in to the centre of the town. The well-established Fernside Rural residential area is about 2.5km west from the junction of Lehmans and Rangiora-Oxford Roads.

Figure 2: the site is a broader context (Site marked red)

4. The Site is not identified as lying within a preferred growth direction for Rangiora in the Waimakariri 2048 District Development Strategy (2018) (**WDDS**) **(Figure 3)**. No land west of Lehmans Road is included in the West Rangiora Development Area (**DEV-WR**) in the PWDP.

Figure 3: Figure 11 WDDS

5. The Council reviewed its strategic approach to the location and provision of Rural Residential land (now zoned LLRZ in the PWDP) in the WDSS. It adopted the position that it would:

a) Explore tools such as cluster development to manage rural character

b) For rural residential development, adopt an approach that has a primary focus on creating new rural residential areas, with a secondary focus on enabling large lot intensification within existing rural residential areas where there is sufficient community support and servicing available

c) Review the Rural Residential Development Plan for the whole District (pg 21 WDDS).

6. Rangiora presently has a population of 17,841 (2018 Census). It grew steadily between 2006 and 2018. Growth of Rangiora since then has continued in step with the district growth which has increased 8.2% between 2018 and 2021 from 61,300 to 66,300 at an annual average of 2.8% from 2018 to 2020 (Statistics NZ Subnational population projections at 30 June 2021: provisional).

2006 (count)	2013 (count)	2018 (count)
12,165	15,069	17,841

Statistics NZ

Population projections at 30 June

PLANNING STATUS OF THE SITE

Chapter 6 of the Canterbury Regional Policy Statement

7. An assessment of the CRPS is set out in **Appendix 1** to this submission.
8. The Site is within the Greater Christchurch area.
9. It was not shown as a Greenfield Priority Area – Residential (GPA) on Map A of the Canterbury Regional Policy Statement (CRPS). The GPA terminates at Lehmans Road.
10. As a result of the Minister for the Environment's decision of 28 May 2021 on Change 1 to Chapter 6, an area largely south of Oxford Road and a finger of land to the north of Oxford Road was included as a Future Development Area (**FDA**) (**Figure 4** orange).

Figure 4: Map A Chapter 6 Regional Policy Statement Greenfield Priority areas
Site location identified with red circle (appx)

11. The FDAs are intended to accommodate the increased demand for new dwellings in that part of Waimakariri District within the Greater Christchurch Urban Area and to respond to the NPS-UD. They do not provide "plan enabled" land as they need to negotiate a rezoning process to confirm their status as land developable for housing and other urban purposes.
12. The proposal for a LLRZ zone with average lot sizes of 1500m2 is inconsistent with the policy approach of Chapter 6 for Greater Christchurch, in that if fits none of the residential living typologies provided for in Chapter 6 and is not in a location identified for urban or rural residential development. It sits 'between' the urban and rural residential densities provided for in the CRPS (minimum 10 hh/ha for urban in Waimakariri, and average 1-2 hh/ha for rural residential). The proposed density is appx. 6.66 hh/ha.
13. Notwithstanding, the proposal meets all the location and other criteria in CRPS Policy 6.3.9 for rural residential development. It is:

• Outside the CIAL noise contours
• Has some sites with restrictions from the take-off and landing vectors for Rangiora Airfield but not such as to impact its operational capacity.
• Is outside the groundwater protection zone
• Is not within the Waimakariri stop bank system
• Has no views of or to the Port Hills
• Has good access for emergency services
• Will not create reverse sensitivity issues with adjoining land uses; Rangiora Racecourse is 500m away.
• Free of significant natural hazards and is a flat site.
• Supports no significant natural values or ecological values.
• Contains no SASMs.
• Can be integrated into or consolidated with the existing urban area of west Rangiora.
• Contains no surface water bodies so there will be no adverse impacts on these.
• The development will be contingent on an ODP to provide integrated design for subdivision and land use, and provide for the long-term maintenance of a high quality high density rural residential character.
• The proposal is not intended as a staged development towards full urban; rather it is intended to provide a unique residential environment that can stand alone and contribute to the urban fabric of Rangiora like Palmview in east Rangiora, or as Kaiapoi Lakes does for Kaiapoi.

14. Overall, the proposal is not consistent with Chapter 6 but that is more a function of its original purpose when formulated in 2013. Notwithstanding that, the submission for a lower density residential focussed, high quality urban environment that attaches to an existing urban area and that promotes a coordinated pattern of development has planning merit.

Operative Waimakariri District Plan

15. The Site is zoned Rural in the Operative Plan. The minimum lot size for subdivision and a dwelling is 4 ha.

Proposed Waimakariri District Plan

16. The Site is zoned Rural Lifestyle Zone **(LRZ) (Figure 4).** The minimum lot size for subdivision and a dwelling in the LRZ is 4 ha.

17. Oxford Road is a strategic road and Lehmans Road is a collector road.

Figure 5: Proposed District Plan Zoning (site outlined in red)

18. The Site is also subject to, or potentially influenced by, a number of Overlays:
a) Rangiora Airfield Take Off Climb and Approach Obstacle Limitation Surface (**Figure 6**)
b) National Grid Transmission Lines (**Figure 6**)
c) Liquefaction: Liquefaction damage is unlikely (**Figure 6**)
d) Non-Urban Flood Assessment Area (**Figure 7**)
e) Geographic areas: Ecological Area – Plains
f) Ecological District – Low Plains

Figure 6: Rangiora Airfield Take-off and Approach vectors (blue dashed lines); Liquefaction damage unlikely (green)Transmission lines (green lines); Site outlined in red

Figure 7: Non-urban flood assessment & Waimakariri Flood Hazard maps
Blue – medium risk, green – low risk, white – very low

DEVELOPMENT PROPOSAL AND PROPOSED REZONING

19. Subdivision of the Site will create approximately 311 LLRZ D2 lots.

20. The key design drivers for the proposal are:

a) A high amenity premier residential zone with large houses on large sites – average 1500m^2, min 1000m$_2$ based on the St Kilda, Hamilton development concept (**Figure 8**).

b) LLRZ D2 standards would enable a lower density zone in the medium term e.g. 10 years to achieve a high quality consistent character subdivision. If developed as an integrated development subject to an ODP subdivision can be staged for to the proposal.

c) Creating strong connections with the immediate neighbourhood by providing a cohesive interconnected roading layout that

picks up direct links to the eastern neighbourhood off Lehmans Road and the northern subdivision roading, and carries them into the Site.

d) Creating a high amenity and diverse residential neighbourhood by providing interfaces to roads, reserves and rural environments.

e) Respecting and building on local identity and character of Rangiora by retaining specific vegetation features from the Site, and anchoring the development into the wider landscape.

21. A development concept can provide for sound urban design by:

a) A hierarchy of movement corridors.

b) Prioritisation of walking and cycling.

c) A north-south alignment of street blocks to maximize solar access and provide for efficient use of lots.

d) Block perimeters being kept as small as practicable to aid permeability and higher public amenity.

e) Enabling a range of housing typologies set in high quality landscape and street setting with generous amenity plantings and curtilage.

Figure 8: St Kilda development images (Bayleys)

22. St Kilda, Cambridge is a premier development on the outskirts of Cambridge, centrally located and with easy access to the Waikato Expressway. It was originally part of a small dairy operation which was dissected by the Waikato Expressway, leaving a portion within the Cambridge Town boundary and the larger balance of the property of approximately 80 ha (which became St Kilda) on the Eastern side of the Expressway, left in the Rural Zone.

23. The initial development concepts were for a Rural Residential type development given the Expressway separation of the existing residential development on the Western side of the Cambridge Bypass, however this was not supported by Council and a new concept of larger residential sections of a 1600m² average size was developed and approved – see https://www.stkilda.nz/page/location/

EFFECTS ON THE ENVIRONMENT

Township growth and urban form

24. The Site immediately adjoins the western edge of urban Rangiora.

25. The WDDS indicated a general preference for the direction of urban growth of Rangiora to the east as a way of balancing up the residential areas around the town centre and some growth to the west.

26. The approach of the WDDS was to signal growth options to be confirmed in the District Plan Review:

The broad directions for greenfield residential growth for the District's main towns are set out in Figures 11 to 14. Further work will be carried out to identify and confirm the exact locations and extent of these residential growth areas, together with the intensification

opportunities within existing urban areas. These will be enabled through the District Plan Review and other planning tools.

27. The Strategic Planning documents clearly signal active consideration of growth needs and growth directions. The options available to the Council were constrained by the approach of the CRPS as the District Plan has to give effect to the CRPS and cannot be

inconsistent with it. The CRPS took effect in 2013 and is overdue for review.

28. The CRPS tightly holds urban growth to the constraints of Map A Chapter 6 and the identified FDAs which although amended by Plan Change 1 in 2020 does not respond to the directions of the NPS-UD. In any event the approach is focused on the need for housing in full urban residential land, less on other residential development forms.

29. As such the Site falls outside the planning policy framework for urban growth. However, in terms of urban form and on the ground, there is considerable merit and logic to conversion of this existing LRZ land to a new high amenity residential form that can be integrated into the Rangiora urban fabric.

30. The proposal has the potential to anticipate the longer term growth path confirmed by the decisions on the RRS to protect the future growth option of more intensive urban development in this direction. It can set a pathway to further westward expansion on land

that holds few if any physical barriers to land development.

31. The proposal will contribute to the housing needs of Rangiora and in a form and location that does not undermine the long run urban form of Rangiora. Planned growth confirmed in the PWDP is already intended to extend westwards out to Lehmans Road and to keep the town edge squared up providing depth to future development and providing a rational basis for providing movement networks driven off the key roads such as Rangiora-Oxford Roads. The West Rangiora Future Development Area confirms this approach. The Site sits in the next block west of Lehmans Road so is not proposing a disjointed urban form, nor

one that is not part of the long term thinking of urban form and growth for Rangiora.

32. A full residential zoning is proposed under LLRZ D2 and will provide a high quality street character, overall amenity and passive surveillance over the street, and will create the correct lighting standards, roading standard, fully formed footpaths and cycleways required for a high quality urban environment.

Neighbourhood and wider community effects

33. The Site is serviced by a collector road and is close to an arterial road. This provides for ease of access and safe and convenient movement to and from the Site. A planned development co-ordinated by an ODP can facilitate within the site movement corridors and linkages through the Site to provide for walking and cycling.

34. A key positive neighbourhood and community effect will arise from the existing dwellings and their established gardens and plantings that will anchor new development and provide a point of reference for new dwellings. Development will not be on a bare site; it will take place in an existing established part-residential setting. The transition to a low density, high quality premier residential development will start from a favourable position and minimise the apparent extent and nature of the landscape change.

35. The Site is comparatively large (58.4 ha) and has the potential to support a variety of residential building typologies and this will contribute to a mix of households within the development and provide built form variety and interest in the streetscape. Whilst LLR D2 standards are proposed, it may be that part of the Site is suitable for other higher density forms of development, which would be within scope of the alternative relief, and could be considered as part of the master planning process required for preparation of an ODP (ahead of the hearing). The earlier stages of the St Kilda development were for large lot residential, with more clusters of townhouses included as later stages (and a retirement village). A retirement village is unlikely in this case, given the proximity of the Charles Upham Retirement Village.

36. Rangiora is well-positioned to accommodate and service the needs of a fast-growing resident population that will in turn support more business activity, schools, community facilities and community organisations.

Effects on tangata whenua values

37. The Proposed District Plan does not identify any Sites and Areas of Significance to Maori in the Site, but the nearby Rakahuri/Ashely River identified as SASM-025. This has been scheduled as being

River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species

38. The PWDP has Policy SASM-P8 which is relevant to pre-development processes:

Engagement with rūnanga

Te Ngāi Tūāhuriri Rūnanga and the District Council to encourage engagement with the Rūnanga priorto persons undertaking activities and/or applying for resource consent where the activity has thepotential to adversely affect identified sites or areas of Ngāi Tūāhuriri cultural significance. Where priorengagement with Te Ngāi Tūāhuriri Rūnanga h as not been undertaken by an applicant for an activitythat has the potential to adversely affect an identified site, the District Council will consult with the Rūnanga.

39. The Site is not listed as an archaeological site on the NZ Archaeological Site database.

Landscape and visual effects

40. Rural Lifestyle style development exists on the Site now (a series of 4 ha lots with a dwelling and associated accessory buildings on each). The landscape is dominated by shelter belts, utility buildings, significant trees and planted curtilages around dwellings many of which are well set back off the roads down RoWs.

41. An ODP will help to achieve an integrated, cohesive and coherent development The proposal will lead to a modification of the landscape of the Site from a predominantly lifestyle block landscape to a denser semi-urban environment dominated by residential building that will, in time, get the benefit of street tree and reserve plantings and landscape treatments around the houses.

42. The visual effects which will arise from a change in the number of vegetative and built elements in the landscape are significant, but not avoidable, if the Site is to contribute to the on-going growth of Rangiora. The change will contribute to a high quality amenity and quality of environment and one that will be entirely consistent with and supportive of the rural lifestyle residential development that has successfully established on the Site.

Well-functioning urban environments

43. The Site adjoins the existing built up urban area of Rangiora. Immediately to the east are existing or developing residential areas.

44. The conversion of the Site from present rural lifestyle uses to low density, high quality residential will continue a pattern of outward expansion of Rangiora. Such a change may not be consistent with the PWDP's identification of a Future Development Overlay for west Rangiora only as far west as Lehmans Road, but on the ground it will look and integrate as part of the urban fabric.

45. It will provide some replacement lower density living areas for the existing LLR zones at north west Rangiora – but at much more appropriate higher density that the LLR D1 standard which is 1-2 hh/ha. There are two such areas, shown on the planning

maps below. River Road has an ‘urban overlay’ and is intended to be intensified to urban densities. The land on the opposite (east) side of Lehmans Road is a ‘legacy’ rural residential zoning which applies under the Operative District Plan. The landowners have developed the adjoining residential subdivision and wish to develop the land for full urban residential development. Services are in place to support this. The constraint to date has been Map A of the CRPS which does not include the land as a Greenfield Priority Area or Future Development Area, GR zoning of this land is consistent with the NPS-UD.

Figure 9: PWDP as notified – LLRZs shown in light grey. Diagonal stripes – urban growth overlay.
Site outlined in red.

46. Rangiora is growing apace. It is attracting significant interest from new home buyers as people respond to the significant investment in upgraded transport links (Northern Corridor and public transport) and a growing economic base for employment within the District and the City.

47. Rangiora has excellent connectivity to the City, both via the new Northern Corridor, and a nascent cycleway link into the City. There is a very regular bus service every half hour.(the No 1 Blue Line) The standard trip takes 70 minutes, and there is a twice daily weekday morning express service from Rangiora, and seven times weekday express out to Rangiora all via Kaiapoi.

48. The Site will step out the western edge of Rangiora, but as it exists in a peri-urban form now, such a change does not alter how the Site interacts with Rangiora as a whole. It is in many ways a functional part of urban Rangiora now; it’s only the Zone boundaries and policy framework that create the sense of it not being part of Rangiora.

49. The Site is convenient to the Rakihura/ Ashley recreation trails, the racecourse, Arlington Park, and the airfield. The town centre is easily accessible.

50. The following assessment of the criteria in the NPS-UD for determining a well-functioning urban environment shows that the proposed rezoning will deliver urban, housing and residential outcomes that meet those criteria. There will be a variety of homes enabled by generous lot sizes. The Site is well-positioned, building as it does on an existing township well-serviced by public transport and cycling options, to provide good accessibility to jobs, community services, and open spaces, as well as mitigating climate change impacts and future natural hazards by being not near the coast and well removed from major rivers.

NPS-UD Policy 1

Planning decisions contribute to well functioning urban environments, which are urban environments that, as a minimum:	**Assessment**
(a) have or enable a variety of homes that: (i) meet the needs, in terms of type, price, and location, of different households; and	The proposal is to have larger lots supporting predominantly standalone dwellings and associated accessory buildings (including generous sized garaging) in an open landscaped garden setting. This will fill a gap in the range of housing typologies available at Rangiora and contribute to a better functioning urban environment overall at Rangiora. It is not necessary for each individual rezoning proposal to have a wide range of housing typologies, and in some circumstances this may not be appropriate. The rezoning will deliver a premier high amenity urban subdivision with generous sized lots which will complement existing and planned higher density residential development at west Rangiora. There is scope with the relief sought for a mix of residential densities. The appropriateness of this can be considered at the master planning/ODP stage.
(ii) enable Māori to express their cultural traditions and norms;	The Site has the potential to create a unique urban environment in Rangiora. It can follow the example of Palmview based on a lake or Kaiapoi Likes providing a niche housing option in Rangiora and the District meeting a need for residential land not constrained to GRZ standards.
(b) N/A business sectors	

(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and	The Site has access to a collector road and a strategic road providing easy access to key community amenities and facilities. The town is served by a public bus route to the city, and a cycle trail connecting to Kaiapoi and the City. The new West Rangiora Development Area adjoins the Site to the south. The Site will become closer to Rangiora public transport routes as they extend out to service this new growth area over time. The Site is in walking distance to Arlington Park and the Rakahuri/Ashley which contains abundant recreations pace. It is easily accessible to the town centre and within walking distance to the Huntingdon Drive local centre.
(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and	The demand for housing and land in Rangiora is largely ahead of the planning means to respond. This proposal will “top up” the land presently set aside in the PWDP and provide a useful buffer to demand. The Site owners have been keen to release this land for more intense development for some time; there is no prospect of land banking.
(e) support reductions in greenhouse gas emissions; and	The Site has significant advantages in being easily accessible to the town centre and reserves, community facilities and schools. The proposal retains a consolidated form to Rangiora with good connectivity and linkages to recreation space and commercial centres reducing the need for car travel.
(f) are resilient to the likely current and future effects of climate change	The Site is within the area of influence of a major river but the non-urban flood assessment maps do not show extensive flooding likely at the Site. Being inland it is not at risk from climate change induced extreme natural hazard events like sea level rise. or river flooding.

Effects on ecosystems and habitats

51. The Site is currently used for a mix of low intensity (grazing) farming, and lifestyle purposes. Shelter belts and utility buildings have been established
52. The Site has been identified in the PWDP with two ecological overlays (the PWDP ecological overlay – Plains and Low Plains Ecological District). They are a district-wide overlays and no specific ecological values have been identified in the Proposed Waimakariri District Plan. These overlays seek primarily to retain indigenous vegetation. The PWDP identifies SASM 025 nearby the Site. That is a Site and Area of Significance to Maori and in SASM - Schedule 1 is identified as *being River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species.*

Effects on natural and physical resources

53. The Site drains in a SE direction towards the newly developing residential area.
54. There will be a degree of site disturbance as part of creating the roading network, and reserves, and as part of curtilage development on each lot.
55. The proposed use for residential activity inevitably leads to loss of some rural productive potential as land owner intentions are not about farming or productive use of the land, but lifestyle use and enjoyment. Built forms and hard surfaces become more dominant.
56. The Site comprises 4ha bocks now and these are not able to be used effectively for productive purposes other than for

intensive productions based on tunnel housing and other supported production systems. None exist in the Site now.
57. The Site contains Class 2 and Class 3 soils as defined in the NZ Land Use Inventory (Landcare Research) Land Use Capability classes 1-3 **(Figure 10)**. Productive use of these soils other than for low level purposes i.e. grazing, is not feasible given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production).

Figure 10: Site soils: Site outlined in red; (Canterbury Maps)
Class 2 soils: bright green/Class 3 soils: light green;

Discharges of contaminants into the environment
58. There will be no discharges of contaminants into the environment. Wastewater will discharge to the Council's reticulated system.
59. Stormwater discharges will potentially be to ground given ground conditions or to an approved and consented stormwater management and treatment area which will meet all relevant Council standards.

Risks from natural hazards or hazardous installations
60. The PWDP planning maps show the Site as being within a Non-Urban Flood Assessment Area.
61. The District Plan maps do not identify high flood hazard areas or high coastal flood hazard areas, rather these are identified through the flood assessment certification process. This enables the most up-to-date technical information to be used. However, as a guide, areas that are potentially high hazard can be identified through the Waimakariri District Natural Hazards Interactive Viewer (NH - Introduction).
62. Rules that refer to a Flood Assessment Certificate require a certificate to be obtained from the District Council to determine compliance with the relevant rule. The alternative is to apply for resource consent as set out in the rule.

63. Rule NH-R2 states
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;

64. Assessment of flood risk and consequence can be undertaken at subdivision stage.
65. There will be no hazardous installations proposed on the Site.

Geotechnical assessment
66. The PWDP planning maps show the Site as being "Liquefaction damage is unlikely. Standard investigation procedure outlined in NZS3604 is appropriate".

Contaminated land
67. A Preliminary Site Investigation can be carried out for the Site at subdivision stage.
68. An enquiry of ECAN has identified that two sites at the northern end of the Site potentially contain some contaminated land, which can be investigated further at subdivision stage **(Appendix 6)**. 315 Lehmans Road is an unverified HAIL site (previous use for clay target shooting) and 317 is registered as containing uninvestigated persistent pesticide bulk storage.

Servicing
69. Proposals for servicing the Site and the effects from such servicing in relation to domestic water supply, wastewater, stormwater, roading, and telecommunications will be required for any subdivision consent.

Economic effects
70. It is anticipated that urban development will generate positive economic effects, both from the investigation/development phase and for the longer run economic activity from householders participating in the local economy.

Climate Change effects
71. An assessment of the effects of the proposed rezoning on climate change is included as part of the assessment of a well-

functioning urban environment above.
72. A well-functioning urban area that is designed and serviced in an integrated manner, applying sound urban design principles, will enable a reduction in greenhouse gas emissions compared to unplanned, ad hoc development that does not create compact urban forms located where the services and benefits of existing, established urban areas are not readily accessible.
73. There is a triangle of planning influence that can be brought to bear on reducing greenhouse gas emissions
a) Compact urban form minimising distances between homes and work/play options.
b) Proximity of homes to community facilities, services and amenities and business/work areas.
c) Design and provision of movement corridors and linkages that create opportunities other than for vehicles for getting around.
74. The Site of the proposed rezoning:
a) Helps in retaining a compact urban form to Rangiora.
b) Is easily accessible to the town centre and is located convenient to the recreation resources of the nearby Rakahuri/Ashley River, the airfield and racecourse and Arlington Park.
75. Rangiora has excellent connectivity to the City, both via the Northern Motorway, the new Northern Corridor, a cycle way link to Kaiapoi which is linked to the new north city cycle way along the Northern Corridor and a very regular bus service.

Positive effects
76. The proposed rezoning will provide for the continued growth of Rangiora by managing the development through an ODP. The proposal will provide a buffer to on-going high level demand for lots in Rangiora. It will cater for a specific housing need not found in GRZ Zoned land nor LLRZ land. The proposed rezoning is anticipating a form of development that is a much more efficient use of a qualifying site supporting a well-functioning urban area. It is a positive endorsement of Rangiora as a growth node in the District.
77. The benefits derived from a planned ODP approach include facilitating high levels of connectivity, creating community links to identified focal points. The Site is close to recreation facilities. A coordinated and integrated development will provide a distinctive environmental quality and point of difference to the development.
78. The Site adjoins existing and developing residential development on the western edge of Rangiora.
79. From a community well-being perspective, the provision of additional land for residential growth will continue to support the Council's investment in community infrastructure by maintaining and facilitating growth rates, increasing the rating base and attracting development contributions.

STATUTORY PLANNING ASSESSMENT
80. Submissions must be assessed under the provisions of the RMA, including Part 2 and Section 32 (Requirements for Preparing Evaluation Reports).

National Policy Statements
National Policy Statement on Urban Development Capacity (NPS-UD)

81. The NPS–UD applies to this proposal as it is directed at Tier 1 urban environments, and
Tier 1 local authorities which includes Waimakariri District as part of the Christchurch urban environment that is defined in Table 1 of the NPS, and additionally defined as:
any area of land (regardless of size, and irrespective of local authority or statistical boundaries) that: is, or is intended to be, predominantly urban in character; and is, or is intended to be, part of a housing and labour market of at least 10,000 people.
82. The NPS-UD recognises the national significance of:
a) Having well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future; and
b) Providing sufficient development capacity to meet the different needs of people and communities.
83. The NPS outcomes are to be achieved through objectives that address:
a) Planning decisions improving housing affordability by supporting competitive land and development markets.
b) Regional policy statements and district plans enabling more people to live in areas of urban environments near centres or areas with employment opportunities, area well serviced by public transport or a high demand for housing in the area.
c) Urban environments developing and changing over time in response to diverse and changing needs of people, communities and future generations.
d) Local authority decisions on urban development being integrated with infrastructure planning and are strategic over the medium term and long term.
e) Local authority decisions on urban development are responsive particularly for proposals supplying significant development capacity.
f) New Zealand's urban environments support reductions in greenhouse emissions and are resilient to current and future effects of climate change.
84. The key method to achieve these objectives is by development of a Future Development Strategy (FDS). This will set out how

the Councils will provide for sufficient development capacity over the next 30 years to meet expected demand. There is no FDS for the greater Christchurch Urban Area that meets the requirements of the NPS-UD.
85. Work on development capacity completed for the NPS - UDC 2016 by the Greater Christchurch Partnership as an Update of the existing Urban Development Strategy (UDS) – Our Space 2019 confirmed what there was a shortage of feasible development capacity for future housing in Waimakariri District for the medium (next 10 years) and long term (10 to 30 years) periods. That assessment is now out of date as it does not address the requirements of the NPS-UD; and rates of take up of land have exceeded projected rates.
86. One of the key changes in the NPS-UD is that local authority decisions on urban development that affects urban environments are responsive, particularly to proposals that would supply significant additional capacity. It also amends the required methodology for housing and business capacity assessments.
87. The current CRPS does not meet the new NPS-UD requirement in relation to proposals for significant additional capacity. Regional councils are required to include criteria in the RPS to determine what plan changes will be treated for the purposes of Policy 8 as adding significantly to development capacity as soon as practicable. ECAN has yet to respond to this requirement.
88. The NPS-UD has immediate effect, so in the meantime, proposals such as this submission must be assessed in the context of the overall intent and purpose of the NPSUD as articulated in the NPS-UD objectives and policies. This includes that NZ has well-functioning environments; provides sufficient development capacity to meet the different needs of people and communities; planning decisions improve housing affordability to contributing to competitive house and land markets; and RMA plans enable more people to live near major employment areas, where there is existing or planned public transport, and where there is high demand for housing.
89. The NPS-UD is the higher order document and its requirements override those of lower order documents where there is a conflict, including regional and district RMA plans.
90. Key objectives and policies in the NPS-UD are assessed here:

NPS-UD Objective/Policy	**Assessment**
Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	The proposed development will further enable Rangiora to sustain itself as a well-functioning urban environment by consolidating the residential area close to the town centre, and provide residential development close to public transport links and existing community and commercial facilities including Huntingdon Drive local centre.
Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.	The proposal provides choices in the Rangiora housing market and in doing so supports housing affordability. Whilst the proposal is for a premier larger lot urban residential development, it is important that all sectors of the market are catered for. This will be more affordable than forcing those wanting large sections out to the much larger and very limited areas of LLR D1 development, or having to purchase 2-3 sections in a standard residential subdivision. There Site is in multiple ownership and the landowners are working together to achieve the rezoning. It will bring more competition into the market by bringing new entrants into the market.
Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply: the area is in or near a centre zone or other area with many employment opportunities the area is well-serviced by existing or planned public transport there is high demand for housing or for business land in the area, relative to other areas within the urban environment.	The CRPS is due for review in 2024 but in the meantime the existing CRPS is not in accordance with the NPS-UD 2020. The proposed rezoning is on the edge of the District's largest centre, which offers a wide range of community and business services, and employment opportunities. It is expected that a proportion of future residents will commute outside the township, but as the township and associated business areas e.g. at Southbrook, continue to grow, this is expected to become proportionally less. Rangiora is well serviced with public transport, there is scope for future mass transit PP, and there is a high demand for housing at Rangiora. The Site adjoins the new West Rangiora Development Area, to the south. Extensions of public transport to service this growth area will be readily accessible to the Site.

Objective 6: Local authority decisions on urban development that affect urban environments are: integrated with infrastructure planning and funding decisions; and strategic over the medium term and long term; and responsive, particularly in relation to proposals that would supply significant development capacity.	Whilst not currently identified as a future growth area in RMA documents, the Site is well placed at the township edge to be serviced by existing infrastructure. Some upgrades may be required, which will be investigated further with Council prior to the hearing. See Policy 8 below for commentary on proposals which supply significant development capacity
Objective 8: New Zealand's urban environments: support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change	The proposal adjoins the existing built up are of Rangiora, close to public transport links. Its excellent accessibility to Christchurch City, substantially enhanced with the new Northern Motorway extensions, means it is now highly accessible to these nearby major employment areas. Travel distances are relatively short, minimising vehicle miles and the potential for greenhouse gas emissions. There is a cycleway link from into Christchurch City, and regular bus services, including an express route. The Site is inland and not subject to natural hazard risks associated with sea level rise arising from climate change.
Policy 1 – Planning decisions for well-functioning urban environments	Assessed at para 41-50
Policy 2 - Sufficient development capacity Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.	The proposed rezoning is anticipated to provide sections that will be available for the short term (up to 3 years) and into the medium term (3-10 years) if adopting a more conservative outlook. The locational and amenity advantages of Rangiora also favour strong ongoing demand. The PWDP UFD-O1 Feasible Development Capacity for residential activities identifies the need for 6300 residential units in the period 2018-2028, and 7100 residential units 2028-2048. These numbers are derived from Chapter 6 CRPS Table 6.1. and are out of date. Data from the Council (November 2021) confirms that there are about 800 vacant lots in Rangiora. Building consents are at about 180/year. That means there is about 4 years vacant land supply. A lead in time of 3-5 years is needed to go from rezone to house build so the Council is facing an unnecessary squeeze on land availability. That will translate in to an upward shift in land and section prices as has been the case at Rolleston. The data suggests that the PWDP will be late to the party to ensure there is at least sufficient development capacity to meet expected demand for housing land over the short term, medium term, and long term. There is a looming, inevitable land supply issue so any proposal to add capacity will push the Council closer to meeting the requirements of the NPS-UD. The proposal is consistent with ensuring there is at least sufficient land supply for housing.
Policy 8 – Responsiveness to plan changes Local authority decisions affecting	The proposed rezoning is not anticipated by RMA documents - it is not a Greenfield Priority or Future Development Area in the CRPS, or a New Development area in

urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is: (a) unanticipated by RMA planning documents; or (b) out-of-sequence with planned land release	the PWDP. A responsive approach to the proposal is required as it meets the Policy 8 criteria for unanticipated zoning. It will contribution to well functioning urban environments and will add significant development capacity. There is no development capacity for the housing typology proposed – so any provision is significant in this context. The development will deliver appx 311 high amenity large lot residential sites at an average density of 1500m2. This will be higher if a mix of densities are proposed, which may be appropriate in some parts of the Site, dependent on master planning work to follow.

91. Adopting the submission to re-zone the land, and enable the proposed development on the submission Site will satisfy the objectives and policies of the NPS-UD.

Proposed National Policy Statement for Highly Productive Land (NPS-HPL)

92. The Government proposed in 2019 a NPS-HPL to prevent the loss of productive land and promote its sustainable management. The overall purpose of the proposed NPS-HPL is to improve the way highly-productive land is managed under the Resource Management Act 1991 (RMA) to:

a) Recognise the full range of values and benefits associated with its use for primary production
b) Maintain its availability for primary production for future generations
c) Protect it from inappropriate subdivision, use, and development.

93. The NPS-HPL is still a proposal and not intended to take effect until after Gazettal. At the date of this submission the NPS-HPL has no effect and no assessment of it is required for the purposes of this submission.

94. The Proposed NPS-HPL interim definition of HPL is land defined as Land Use Capability Class 1-3 soils. A portion of the Site contains Class 2 and 3 soils (see **Figure 10)**. Highly productive use of these soils is not realistic given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production). Its present use as lifestyle blocks, low level grazing and agistment is the more likely long run use of the Site if not rezoned.

95. Objective 3 of the Proposed NPS-HPL specifically refers to highly productive soils being protected by avoiding *"uncoordinated urban expansion on highly productive land that has not been subject to a strategic planning process"*. The Site was assessed through a strategic planning process (WDDS 2018) and the RRS as a preferred site for LLRZ development, and rejected for a change in zoning on the basis that it may be required for long term urban growth of Rangiora.

96. It is therefore considered that this submission to re-zone the Site is largely in accordance with the Proposed NPS-HPL.

National Planning Standards

97. The National Planning standards prescribe various matters under the RMA so that there is consistency among planning documents most relevantly here in terms of appellations for zones, and the standards applying to these zones.

98. The proposed rezoning adopts the standard zone appellation, in this case LLRZ as contained in the PWDP.

99. The PWDP identifies plan standards for minimum and average net site areas for the respective zones. These are modified for the proposed rezoning as a higher density LLRZ.

100. The higher density LLR zoning is entirely consistent with the NPS purpose for the LLRZ as reproduced below. In this case, the principal constraint to more intensive development is the peri-urban location where a lower density transition to the rural environment is appropriate (particularly noting that the zone boundary is 'mid block' so there is no natural or physical buffer between rural and residential areas); the existing pattern of 4 ha lots with existing substantial homes and gardens; and the fact that the premier large lot subdivision proposed relies on consistency of housing quality and character to be deliver on this vision for the area.

Large lot residential zone

Areas used predominantly for residential activities and buildings such as detached houses on lots larger than those of the Low density residential and General residential zones, and where there are particular landscape characteristics, physical limitations or other constraints to more intensive development.

Low density residential zone

Areas used predominantly for residential activities and buildings consistent with a suburban scale and subdivision pattern, such as one to two storey houses with yards and landscaping, and other compatible activities.[2]

Canterbury Regional Policy Statement 2013 (CRPS)

101. Chapter 6 of the RPS *"provides a resource management framework for the recovery of Greater Christchurch, to enable and support recovery and rebuilding, including restoration and enhancement, for the area through to 2028. Recovery in Greater Christchurch is also supported by the provisions in Chapter 5 notated as 'Entire Region'. The provisions in the remainder of the RPS also apply.3"*
102. An assessment of the proposed rezoning against the relevant CRPS Objectives and Policies is set out in **Appendix 1**. This should be read in the context of the CRPS being overdue for review and that it does not provide a regional response to the NPS-UD. The
need to focus on earthquake recovery has now passed and so many of the directive provisions need to be given appropriate 'weight' in a new national policy environment with a focus on flexible, responsive panning approaches that better provide for people's needs and well-being.
103. That assessment shows that
a) The development proposal achieves the objectives for the location, design and function of new developments (Objective 5.2.1)
b) The traffic effects of the proposal are unlikely to give rise to adverse effects and so achieves CRPS objectives for the strategic land transport network (Policy 5.3.7)
c) The Site falls outside the FDAs shown on Map A of Chapter 6 and in that regard is inconsistent with RPS Policy 6.2.1 clauses 1 to 3.

1. identifies priority areas for urban development within Greater Christchurch;

2. identifies Key Activity Centres which provide a focus for high quality, and, where appropriate, mixed-use development that incorporates the principles of good urban design;

3. avoids urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS

d) The environmental effects assessment outlined above establish that the proposed development is consistent and will not give rise to any concerns with respect to all the matters listed in RPS Policy 6.2.1 clauses 4. to 11. These matters are:

6.2.1 Recovery framework

Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that:

1. As above;
2. As above;
3. As above;
4. protects outstanding natural features and landscapes including those within the Port Hills from inappropriate subdivision, use and development;
5. protects and enhances indigenous biodiversity and public space;
6. maintains or improves the quantity and quality of water in groundwater aquifers and surface waterbodies, and quality of ambient air;
7. maintains the character and amenity of rural areas and settlements;
8. protects people from unacceptable risk from natural hazards and the effects of sea-level rise;
9. integrates strategic and other infrastructure and services with land use development;
10. achieves development that does not adversely affect the efficient operation, use, development, appropriate upgrade, and future planning of strategic infrastructure and freight hubs;
11. optimises use of existing infrastructure; and
12. N/A

e) The proposed rezoning achieves policies relating to:
- Sustainability;
- Integration of transport infrastructure and land use;
- Urban design; and
- Biodiversity, natural hazards, landscape, soils, contaminated land.

104. In terms of the CRPS polices for rural residential developments (Policy 6.3.9) the proposal sits square with all policy matters other than being a location identified in an adopted Rural Residential Strategy; and being at a higher density than provided for under this policy (ie greater than 1-2 hh/ha). As such it has a majority of features entirely consistent with the policy.
105. The CRPS includes housing capacity targets as below

6.2.1a Targets for sufficient, feasible development capacity for housing [inserted in accordance with sections 55(2) and 55(A) of the Resource Management Act 1991, from the National Policy Statement on Urban Development Capacity 2016]

For the period 2018-2048, sufficient, feasible development capacity for housing is enabled in Greater Christchurch in

accordance with Table 6.1.
Table 6.1 Targets for housing development capacity in Greater Christchurch, 2018-2048

106. These derive from Our Space, under the requirements of the then NPS-Urban Development Capacity 2016, since replaced by the NPS-UD 2020. The targets (known as bottomlines in the NPS-UD) are to be treated as 'minimums' not 'maximums'.
Policy 6.3.12
enables urban development in the Rangiora and Kaiapoi FDAs (new Development Areas in the PWDP) where needed to meet the medium term targets. This a 'minimum' allocation approach contrary to the NPS-UD. The NPS-UD favours over allocation, including in locations unanticipated by RMA plans, where it will add additional development capacity, can be integrated with infrastructure planning and funding, and will contribute to well functioning urban environments – as is the case the proposed Lehmans LLR D2 zone.
107. The proposed Lehmans LLR D2 zone is consistent with the CRPS except with respect to those parts of the CRPS which are out of step with and do not give effect to the higher order plan, the NPS-UD.

Proposed Waimakariri District Plan
108. An assessment of this proposal against the relevant PWDP Objectives and Policies for urban growth and development as notified on 17 September 2021 is set out in **Appendix 2.**
109. That assessment shows that the proposed rezoning is entirely consistent with the relevant objectives and policies, including as sought to be amended by this submission. Those amendments are to UFD-P3 Identification/location and extension of Large Lot Residential Zone areas; and LLRZ-O1 and LLRZ- P1-5 and reflect the intent and outcomes intended for the proposed LLRZ D2 zone, which is a higher density LLRZ zone than the PWDP LLRZ zone (renamed LLRZ D1 in this submission).

ASSESSMENT AGAINST OTHER PLANNING DOCUMENTS
Our Space 2018-2048 Greater Christchurch Settlement Update (2019)
110. Our Space is a non-statutory document prepared under the Local Government Act. It
"responds to the new Government Policy Statement on Land Transport, which has increased funding for mass public transit schemes, and meets the requirement of the National Policy Statement on Urban Development Capacity (NPS-UDC) 2016 to prepare a
future development strategy…. Specifically, it:
• sets out how targets for housing for the next 30 years will be met, accommodating an additional 150,000 people;
• identifies locations for housing growth, encouraging Central City and suburban centre living while providing for township growth in Rolleston, Rangiora and Kaiapoi;…
• promotes a compact urban form, which provides for efficient transport and locates development in a manner that takes into account climate change and sea level rise.[4].

..Underpinning this settlement pattern approach is the vision for a transformation of the transport network that fosters much greater public and active transport usage, and reduced reliance on the private vehicle.
111. Our Space acknowledges that this will require commitment from the Government to invest in the necessary improvements to our transport system, which could include investing in rapid transit services. To date, there has been no successful business case for improved public transportation, including not as a Covid 19 fast track infrastructure project.
112. The Our Space housing capacity targets (Table 3) and Future Development Areas are related to growth of urban areas.
113. Our Space, like the CRPS (and the Operative District Plan) are now out of date, as they do not reflect or give effect to the new requirements of the NPS-UD.

Waimakariri 2048 District Development Strategy (WDDS)
114. The preferred growth directions for Rangiora in the WDDS 2048 (2018) are outlined above (under 'Site') i.e. westwards to Lehmans Road, and otherwise eastwards. However, the Council in its decision on the RRS, recognized west of Lehmmans Road as a potential longer town urban growth area.
115. The WDDS Rangiora Snapshot (pp38-39) -when looking ahead to 2048 proposed that:
a) Rangiora remains the District's largest town
b) 30,000 – estimated population (2048)
c) 12,025 – estimated households
d) 5,025 - new households in Rangiora
e) Continues to accommodate one third of the District's residential growth
f) 167 – estimated annual building consents for new dwellings for the next 30 years
g) 423 hectares of additional feasible residential land required by 2048 (this includes capacity in remaining stages of existing

residential developments as well as new greenfield areas inside and outside of the Infrastructure Boundary)

h) Future residential growth directions proposed to the east (predominantly) and west of the current town

i) Opportunities for intensification/regeneration to be identified

j) New growth directions take into account areas of unacceptable natural hazard risk and areas of significant environmental and cultural values

k) New growth areas to connect into existing sewer and water networks

l) Stormwater Levels of Service designed to meet increased performance requirements

116. At the 2018 Census Rangiora had a population of 17,841, and 7314 total dwellings (incl those unoccupied and under construction). Population projections for the District show an average annual change 2018-2020 of 1700 persons. If Rangiora continues to attract a third of all district growth as stated in the WDSS then Rangiora's population in 2021 will be around 18,900.

Mahaanui Iwi Management Plan

117. Part 1 of the PWDP in a section "Mana Whenua" sets out the position with respect to iwi and the review of the district Plan:

a) The District's territorial area sits within the takiwā (territory) of Ngāi Tūāhuriri which is one of eighteen Ngāi Tahu regional papatipu rūnanga, constituted under the ***Te Rūnanga o Ngāi Tahu Act 1996*** *to represent* ***mana whenua*** *interests.*

b) The preparation and change of a district plan must take into account relevant iwi documents. For the District, Ngāi Tahu has set out its resource management values, issues, objectives and policies within the Mahaanui Iwi Management Plan (2013).

c) The Mahaanui Iwi Management Plan identifies objectives, issues and policies for natural resource and environmental management for six pāpatipu rūnanga (including Te Ngāi Tūāhuriri Rūnanga). It seeks to ensure that the taonga and resources of Ngāi

Tahu mana whenua are recognised and protected in the decision-making of statutory agencies. The Mahaanui Iwi Management Plan contains a comprehensive suite of policies and objectives addressing the range of resource management matters of significance to tangata whenua. The District Council shall have regard to the Mahaanui Iwi Management Plan when preparing or changing the District Plan, to the extent its content has a bearing on resource management issues of the District.

118. The Mahaanui Iwi Management Plan (MIMP) 2013 was released on 1 March 2013.

119. The MIMP is a tool for tangata whenua to express their identity as manawhenua and their objectives as kaitiaki, to protect their taonga and resources, and their relationships with these. The MIMP seeks to ensure that these taonga and resources are recognised and protected in the decision-making of agencies with statutory responsibilities to tangata whenua. Importantly it is also a tool that assists Papatipu Rūnanga representatives to articulate their values, issues and policy into statutory processes.

120. The MIMP includes both general objectives and policies about the management of land, air, and water, and also includes catchment specific objectives and policies.

121. Section 5.3 Wai Maori (pp77-98) contains an extensive discussion about tangata whenua rights and interests in freshwater. It provides a suite of Issues, Objectives and Policies for freshwater

122. Section 5.4 Papatuanuku (pp101-124) sets out the Ngai Tahu Subdivision and Development Guidelines that are to be read along-side objectives relating to:

a) Land use planning and management in the takiwā reflects the principle of Ki Uta Ki Tai. (from the mountains to the sea)

b) Rural and urban land use occurs in a manner that is consistent with land capability, the assimilative capacity of catchments and the limits and availability of water resources.

c) Inappropriate land use practices that have a significant and unacceptable effect on water quality and quantity are discontinued.

d) Ngāi Tahu has a prominent and influential role in urban planning and development.

e) Subdivision and development activities implement low impact, innovative and sustainable solutions to water, stormwater, waste and energy issues.

123. Section 5.5 Tane (pp127-137) includes objectives that focus on:

a) Regional policy, planning and decision making in the takiwā reflects the particular interest of Ngāi Tahu in indigenous biodiversity protection, and the importance of mahinga kai to Ngāi Tahu culture and traditions.

b) The customary right of Ngāi Tahu to engage in mahinga kai activity is recognised, protected and enhanced…

c) Customary use, and therefore mahinga kai, is given effect to as a first order priority for freshwater management in the takiwā.

124. Section 6.4 (pp213-224) addresses issues of particular significance to the lands and waters of the Waimakariri catchment within which the Site lies.

125. Relevant Objectives relating to urban development of land in that catchment include:

a) The natural "energy, vitality and life" of the Waimakariri River as a braided river is protected and restored.

b) The discharge of contaminants to the Waimakariri and its tributaries is eliminated.

c) Water quality and flows in the Waimakariri and its tributaries are improved to enable whānau and the wider community to have places they can go to swim and fish.

d) The mauri and mahinga kai values of the Waimakariri and its tributaries and associated springs, wetlands and lagoons are protected and restored; mō tātou, ā, mō kā uri ā muri ake nei.

126. A key issue relating to subdivision and development is that subdivision and development activities in the lower catchment have the potential to adversely affect Ngāi Tahu values such as waterways, mahinga kai and sites of significance (Issue Wai4).

127. The proposal provides for full urban reticulation of the three waters and is consistent with the objectives and policies contained in Chapters 5.3 and 5.4 of the MIMP. The proposal does not preclude individual land owners from installing rainwater collection and use from roof areas at the time of building development.

128. The proposal has been designed taking into consideration the potential effect of resultant subdivision and development on the rivers and streams that flow into the lowland rivers.

129. Overall it is considered that the proposal will not have adverse impact on the cultural values of iwi as set out within the MIMP.

SECTION 32 ASSESSMENT

130. A Section 32 assessment is contained in **Appendix 3.**

131. In summary, the PWDP zoning and associated rules (RLZ Zone with a minimum lot size for subdivision and a dwelling 4ha) do not meet the needs and aspirations of the current owners.

132. Strategic Council planning documents (specifically the WDDS) have a focus on only meeting urban growth demands within urban environments of existing towns. They favour intensification (15hh/ha) and a strict allocation of capacity by development areas. It is a control and command regime consistent with Map A of Chapter 6 of the CRPS but is out of step with the requirements of the NPS-UD which requires a more flexible, responsive approach, prohibits a hard fixed unmoveable urban/rural boundary.

133. This approach leaves little room for new proposals or proposals that do not sit square with the standard array of GRZ/medium density or SETZ (Settlement Zone). SETZ applies to some of the District's smaller settlements outside Greater Christchurch.

134. Neither LRZ nor Large Lot Residential (LLRZ) as notified in the PWDP is an efficient use of this block of land located as it is immediately adjoining the urban area of Rangiora, and in a location easily accessible to the town centre by active transport modes as well as car and several district reserves.

135. If this Site is not zoned for LLRZ D2 (minimum average lot size 1500m^2) use to enable residential re-development then it will drive pressure to re-zone elsewhere. That step potentially will not have the significant benefits to Rangiora long term in relation to enabling a well-functioning urban environment that enables people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future. Additionally re-zoning to LLRZ D2 will contribute to providing additional development capacity to meet the different needs of people and communities in a planned manner and consistent with the NPS-UD.

136. The Site can readily be developed to reflect the principles of the Urban Design Protocol with values of character, context, and connectivity.

137. The Section 32 assessment concludes that the proposal to re-zone the Site from LRZ zone to LLRZ D2 Zone (average lot size 1500m$_2$) is the most appropriate method for achieving the objectives of the proposal, than the other alternatives considered.

138. Option 2 identified in the s 32 assessment is consistent with some PWDP policies notwithstanding that it does sit square with the strategic intentions signaled in the WDDS and the PWDP approach to providing for development capacity and urban development.

139. Option 2 identified in the s 32 assessment to re-zone the Site is the most appropriate given:

a) The proposals adopt the PWDP zones, development and activity standards with appropriate amendments. This ensures continuity of the District Plan anticipated environmental outcomes and urban amenity for Rangiora and adjoining residential areas;

b) Will be consistent with and give effect to many of the relevant PWDP objectives and policies;

c) It is a logical extension to the developed and developing residential land adjoining the Site while achieving a compact, efficient urban form that removes pressure on isolated rural land elsewhere around Rangiora.

d) It gives effect to the NPS-UD, specifically Objective 6 c) and Policy 8, delivering significant additional development capacity and contributing to a well functioning urban environment.

e) It is assumed that there will be capacity in the public utilities and the existing road network, including planned upgrades, to accommodate the traffic effects of the redevelopment;

f) The proposed Site specific ODP will provide certainty of the final form and disposition of the re-zoned area including its proposals for reserves, roading, future linkages for pedestrian and vehicular traffic.

140. The re-zoning proposal is considered to be appropriate to achieve the sustainable growth and development of Rangiora.

141. The economic, social and environmental benefits of the proposed rezoning outweigh any potential costs.

142. The overall efficiency and effectiveness of the proposed rezoning (Option 2) is high, in comparison to the alternative options set out in the s 32 Assessment which are low (Options One and Four) or low to moderate (Option Three).

143. The PWDP proposes to release land for development in the new Development Areas at Rangiora and Kaiaipoi through a novel and untested certification process that is not clearly derived from RMA statutory powers, nor Local Government Act 2002 (LGA) authority. This approach is not proposed for the LLR Overlay areas. As the proposed Lehmans Road LLR D2 zone proposed by this submission seeks large lot urban densities, it is anticipated that Council may favour the certification process if it accepts the proposed rezoning. This is opposed – rezoning to LLRZ D2 is sought.
144. Potential difficulties with the proposed certification process are identified and discussed in the Section 32 Assessment. (**Appendix 3)**. In summary, the process is hugely discretionary, does not provide conventional rights to an applicant (eg right of objection/appeal) meaning decisions cannot be challenged, and it is not apparent that the process will be appropriately documented with a transparent record of the decision-making within the certification process. Further uncertainty arises in the practicalities of how to negotiate and manage the staging, funding and building of key infrastructure across a range of Sites, and a risk that land supply is controlled by a limited number of large developers. It is a far less efficient and effective method for delivering land for housing than the Council rezoning the land in the PWDP.
145. The proposed rezoning is considered to be the most appropriate, efficient and effective means of achieving the purpose of the RMA.

CONSULTATION
146. The landowners and their consultants have submitted on the WRRS and the WDDS (**Appendix 4)**.
147. The submissions to re-zone as rural residential or identify the Site as suitable for LLRZ have been rejected as noted above. LLRZ but at higher densities as now proposed is considered to be a more efficient use of the land and better meets market demand. 5000m^2 sites provide more land is needed for a spacious home and garden.
148. The landowners have been consistent in their wish to find a zone and possible land uses better suited to their needs.

CONCLUSION

173 The submission seeks to rezone 58 ha of land adjoining Rangiora from Lifestyle Rural Zone (LRZ) to Large Lot Residential with a specific density standard (LLRZ D1), minimum average lot size 1500m^2.
149. The Site has a long history of rural lifestyle use. It is not significantly restricted by potential natural hazards especially flooding, nor does it have physical limitations for development for residential purposes as it is not liquefaction prone, and has no known geotechnical limitations but does contain an area of LUC 2 soils. It is near a site of significance to iwi (SASM – 025) being the Rakahuri/Ashley River The Site has access to a collector road and is near to a strategic road giving direct access to the town centre and a range of community amenities and facilities.
150. The Site immediately adjoins the urban area of Rangiora, and is well located to join in to Council utility services. It is well suited for conversion to residential use.
151. The Site is not identified within the westward growth direction for Rangiora in the District Development Strategy 2018 nor is it part of the DEV-WR development area which adopts Lehmans Road as its western boundary. It is in a location that achieves coherent and compact urban form offering ease of access to business services, community facilities, reserves and the primary road network.
152. The proposed rezoning provides for a connected and high amenity residential living environment not presently available under the PWDP while avoiding and/or mitigating any potential adverse effects on the environment. It will provide for continuing high demand for a variety of high quality residential sections aimed at a particular segment of the housing market in an ideal location, easily accessible to the existing town centre services and facilities. It will broaden the range of housing available. As such, it is consistent with the NPS-UD including Objective 6c) and Policy 8, to be responsive to proposals which supply significant development capacity and contribute to a well functioning urban environment.
153. The use of this Site for residential purposes can be a sustainable and efficient use of land and infrastructure. The proposed rezoning better provides for the social, economic, environmental well-being of the landowners and the Rangiora community than continuation of the current low intensity lifestyle land use on 4ha blocks, or a conventional LLRZ residential use.
154. Any potential adverse effects of the implementation of the proposed rezoning can be assessed at subdivision stage but there has been no restriction on servicing the blocks to date. Capacity will need to be confirmed for infrastructure, power and road network. Any future subdivision of the Site will need to confirm water supply and wastewater treatment and disposal options.
155. Rezoning of the site to LLRZ zone is not inconsistent with the policies and objectives of the PWDP, but it is at odds with the dated CRPS approach to provision of urban growth and housing capacity for Greater Christchurch, to the extent that it is not within an FDA created by Change 1 to the CRPS and is not identified as an LLRZ site under the strategic RRS prepared by the Council.
156. As the proposal helps achieve the purpose of the RMA, and has been shown to be consistent with the relevant provisions of the NPS-UD, the submission can be accepted by Waimakariri District Council.
Original Submission

Summary Reasons for the Submission

The reasons for our submission are outlined below.

a) The preferred relief (**the proposed rezoning**) is both appropriate and necessary to achieve sustainable growth and development of Rangiora and the District and meet the requirements of the National Policy Statement for Urban Development 2020 (**NPS-UD**).

b) The Site identified in Figure 1 and at para 1 of the Preferred Relief above is a logical and preferred location that lends itself to a specific type of housing development not provided within the PWDP as a residential option adjoining but outside the existing urban areas. Nowhere is it possible to develop in a comprehensive, coordinated way a low density, high quality residential environment in the District's towns, the Rural Lifestyle Zone or Settlement Zone as a permitted activity.

c) The requirement for 12/15 hh/ha in GRZ zones (the majority of land in urban areas) drives development to modern scale relatively small urban lots best produced as a package across a significant land holding. The GRZ subdivision standards do not provide for the needs of people who seek a generous sized urban lot residential setting. This is a housing sector that is running against the planning tide of intensification but is, nonetheless, a legitimate form of housing in an appropriate setting. The barriers to such development in urban areas requires an appropriate setting/ location in the rural areas but close to or adjoining the urban areas and at a much lower density than is desired or appropriate (the PWDP LLRZ) to meet the housing needs for generous sized urban lot residential living..

d) The PWDP subdivision standards for LLRZ require lots that are very large for those whose primary interest in a rural setting is a form of residential living, not one that requires significant maintenance and management often involving animals or machinery at scale. Conversely, the GRZ subdivision standards do not provide for the needs of people who seek a large lot residential setting

e) The focus in the PWDP is on prescribing a limited range of residential options and tightly controlling and constraining housing choice within those options. Further urban growth is also tightly constrained and controlled around DEV areas around Rangiora and Kaiapoi but for a very specific form of residential development driven off density requirements that do not match the needs of all landowners.

f) The focus in most new District Plans, driven in part by the National Planning standards, is to simplify the range of zones, to standardize lot sizes, to supposedly create efficiency and certainty through ease of administration of the District Plans. This is done by constraining housing and land development choices by lot size, by location, by built standards and the disposition of built/open elements in a site. However, the National Planning standards do provide for large lot urban residential living, a residential living option which has not been taken up the PWDP (due most likely to the restrictive provisions of the CRPS which only prescribe one from of lower density residential living, at a density of 1-2 hh/ha).

g) This planning approach may be a standard approach to resource allocation but it does not provide a flexible, responsive approach to innovative and new development options. The Government is creating policy settings that on one hand seek intensification in urban areas, while at the same time pushing away from a land allocation model of planning. The PWDP in striving to face both policy directions has a package of measures that are in fact a major barrier in terms or cost, timeframes and certainties for proposals that are not cut from the suite of housing and development options set out by the PWDP. The allocation of land in preferred development areas, it must be said, runs counter to the Government's push, and now its direction, to free up land for development, to encourage innovation in housing (presently with a focus of intensification) and to make available a range of responses to the need to meet the housing needs of people and communities set out in the NPS-UD.

h) While the weight of demand (and the planning response) is around affordable housing, around small lots and dense development that supports investment in public facilities and amenities such as public and active transport, reserves, and commercial services, there is always a wide spectrum of preferences at play in the housing market. The demand for high quality, generous houses set on generous sized parcels of land within high amenity settings is an important and no less relevant housing sector. There is a strong unmet demand, as confirmed by advice from Bayleys real estate (**Appendix 5**) for larger family homes with room for a pool or similar. Purchasers want to be close the amenities of Rangiora and within walking and cycling distance of local schools. They do not want the only available options – a 4 ha lifestyle block or 5000m^2 rural residential site at Mandeville or Ohoka.

i) Interestingly enough for a nation built on the so-called quarter acre paradise, recent policy and planning interest in housing and land development has now seemingly positioned the 1011m^2 section as a luxury item, as the antithesis of providing for community well-being and needs. It is as though the old quarter acre of itself acts against building a sense of community despite being able to be developed in a planned, structured, coordinated or integrated manner. Rather than being a frivolous discretionary item in land development
and housing choice, a well-planned, well located and properly serviced low density residential environment has much to offer urban environments. They can be tactically used to provide shape and edge to urban areas, they can provide a mass of amenity different from (and potentially complementary to), but no less legitimate in urban outcome terms, to conventional GRZ zoned land.

j) In many ways the approach of a district plan to the role and place of the old quarter acre is not dissimilar to the issues faced by comprehensive retirement villages when first proposed. The idea of dense, almost gated and self-contained communities, with multi storey buildings also did not sit well in many district plans. But now they are accepted as an important part of the urban fabric catering to a specific demographic and health demographic. Most plans enable them.

k) Provision for low density residential in an urban setting, or failing that likelihood, in an adjoining rural zone is a fundamental gap in the district plan.

l) The submission seeks to provide for another housing typology not provided in the PWDP and in a location with significant planning merit. The planning case was made out in a detailed submission to the proposed Rural Residential Strategy (**RRS**) for the land identified in this submission to be "reserved" for conventional Rural Residential zoning in the review of the District Plan. That submission was rejected in favour of a decision ascribing an unspecific strategic significance to Lehmans Road as the urban boundary; simply the decision was that rural residential development here would preclude this area as a future urban growth path, even though this was likely to be very long term as the Waimakariri District Development Strategy (WDDS 2018) for the period up to 2048, does not favour urban growth west of Lehmans Road.
Officer Recommendation
Continue to exclude the area west of Lehmans Road and the racecourse land at Rangiora as growth areas as these were originally considered but not included in the draft RRDS as they trigger the key preliminary criteria of: being on the direct edges of a main town outside of the Projected Infrastructure Boundary (PIB) thereby foreclosing more intensive long-term urban development, and…

Panel Recommendation
The panel accepted the officer recommendations to exclude areas on the fringes of Rangiora in the final RRDS due to these having the potential to foreclose more intensive long-term urban development of the town.

m) In light of the above decision on the Waimakariri Rural Residential Strategy, the proposal now is for a form of high amenity low density urban zoning, which whilst in demand is entirely absent from the PWDP. This will be a long term urban form of development. The proposal set out in the submission will achieve a compact, and efficient, urban form on the edge of Rangiora with excellent connectivity by multiple transport modes. It provides for continuous urban development by enabling a built form which can act as a strong zone or urban boundary.

n) The proposed rezoning will accommodate approximately 311 LLRZ lots1 at the proposed amended density standards for LLRZ D2 (average size 1500m^2). It will contribute to a well-functioning urban environment, meeting the NPS-UD Objective 6(c).
o) Any adverse effects on the environment arising from the proposed rezoning will be minimal, if any, and can be adequately mitigated. A high amenity master planned development is proposed.
p) Significant positive effects arise from the proposed rezoning. It will enable the short term housing demand at Rangiora to be met, and can deliver a housing typology for which there is demand, on lots that are not a burden to the landowners (which is the case for 4ha and the very limited areas of LLRZ D1 with a density of 1-2 hh/ha) and for which there is no provision in the PWDP. At present rates of land uptake there is about 4 years vacant land supply in Rangiora. Given it takes 3-5 years to bring land from zoned state to on the market as developed lots, there is some urgency in providing additional capacity. This proposal helps address an anticipated shortfall in residential zoned plan enabled land.
q) There is no additional cost to the Council in re-zoning the Site as there is expected to be capacity in the public utilities and the existing road network, including planned upgrades.
r) Amendments to PWDP objectives and policies may be necessary to provide for a higher density LLRZ, but of themselves will not act against those relating to Strategic Directions Urban Form and Development and Urban Growth. The PWDP approach to zones and
identification of future development land is already out of step with higher order Resource Management Act 1991 (RMA) statutory documents because they do not give effect to the NPS-UD (and are sought to be amended through this submission).
s) The alternatives of retaining Rural Lifestyle or Large Lot Residential zone across the entire Site are not an efficient use of land which immediately adjoins the urban area of Rangiora, and is highly accessible to the town centre by active transport modes as well as car.
t) The proposed rezoning is consistent with and the most appropriate, efficient and effective means of achieving the purpose of the RMA.

The Site
1. The Site is a 58ha block of land ('the Site') accessed from Lehman Road, Rangiora **(Figure 1)**. It is owned by the two submitters and 12 other landowners.

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1 Assumes 20% of land area taken for servicing including roading, reserves and stormwater management if required.

Figure 1: The site (outlined in blue (Google Earth)

2. The Site is surrounded by RLZ land that is used for a mix of lifestyle and conventional farming. To the NE is the Rangiora Eco Holiday Park, and beyond the Park is the Rangiora Racecourse about 300m away from the nearest lot and 1km from the centre of the Site. Land to the south east is GRZ and part of urban Rangiora with newly developing residential land west of West Belt. About 1.9 km to the NW is Rangiora Airfield. About 1km north of the most northern lot is the Ashley River.
3. The southern-most lot in the proposal with the Rangiora Vet Clinic faces, but does not have access to Rangiora-Oxford Road (State Highway 72). This arterial road provides the main road connection in to the centre of the town. The well-established Fernside Rural residential area is about 2.5km west from the junction of Lehmans and Rangiora-Oxford Roads.

Figure 2: the site is a broader context (Site marked red)

4. The Site is not identified as lying within a preferred growth direction for Rangiora in the Waimakariri 2048 District Development Strategy (2018) (**WDDS**) **(Figure 3)**. No land west of Lehmans Road is included in the West Rangiora Development Area (**DEV-WR**) in the PWDP.

Figure 3: Figure 11 WDDS

5. The Council reviewed its strategic approach to the location and provision of Rural Residential land (now zoned LLRZ in the PWDP) in the WDSS. It adopted the position that it would:

a) Explore tools such as cluster development to manage rural character

b) For rural residential development, adopt an approach that has a primary focus on creating new rural residential areas, with a secondary focus on enabling large lot intensification within existing rural residential areas where there is sufficient community support and servicing available

c) Review the Rural Residential Development Plan for the whole District (pg 21 WDDS).

6. Rangiora presently has a population of 17,841 (2018 Census). It grew steadily between 2006 and 2018. Growth of Rangiora since then has continued in step with the district growth which has increased 8.2% between 2018 and 2021 from 61,300 to 66,300 at an annual average of 2.8% from 2018 to 2020 (Statistics NZ Subnational population projections at 30 June 2021: provisional).

2006 (count)	2013 (count)	2018 (count)
12,165	15,069	17,841

Statistics NZ

Population projections at 30 June

PLANNING STATUS OF THE SITE

Chapter 6 of the Canterbury Regional Policy Statement

7. An assessment of the CRPS is set out in **Appendix 1** to this submission.
8. The Site is within the Greater Christchurch area.
9. It was not shown as a Greenfield Priority Area – Residential (GPA) on Map A of the Canterbury Regional Policy Statement (CRPS). The GPA terminates at Lehmans Road.
10. As a result of the Minister for the Environment's decision of 28 May 2021 on Change 1 to Chapter 6, an area largely south of Oxford Road and a finger of land to the north of Oxford Road was included as a Future Development Area (**FDA**) (**Figure**

4 orange).

Figure 4: Map A Chapter 6 Regional Policy Statement Greenfield Priority areas
Site location identified with red circle (appx)

11. The FDAs are intended to accommodate the increased demand for new dwellings in that part of Waimakariri District within the Greater Christchurch Urban Area and to respond to the NPS-UD. They do not provide “plan enabled” land as they need to negotiate a rezoning process to confirm their status as land developable for housing and other urban purposes.
12. The proposal for a LLRZ zone with average lot sizes of 1500m2 is inconsistent with the policy approach of Chapter 6 for Greater Christchurch, in that if fits none of the residential living typologies provided for in Chapter 6 and is not in a location identified for urban or rural residential development. It sits ‘between’ the urban and rural residential densities provided for in the CRPS (minimum 10 hh/ha for urban in Waimakariri, and average 1-2 hh/ha for rural residential). The proposed density is appx. 6.66 hh/ha.
13. Notwithstanding, the proposal meets all the location and other criteria in CRPS Policy 6.3.9 for rural residential development. It is:
- Outside the CIAL noise contours
- Has some sites with restrictions from the take-off and landing vectors for Rangiora Airfield but not such as to impact its operational capacity.
- Is outside the groundwater protection zone
- Is not within the Waimakariri stop bank system
- Has no views of or to the Port Hills
- Has good access for emergency services
- Will not create reverse sensitivity issues with adjoining land uses; Rangiora Racecourse is 500m away.
- Free of significant natural hazards and is a flat site.
- Supports no significant natural values or ecological values.
- Contains no SASMs.
- Can be integrated into or consolidated with the existing urban area of west Rangiora.
- Contains no surface water bodies so there will be no adverse impacts on these.
- The development will be contingent on an ODP to provide integrated design for subdivision and land use, and provide for the long-term maintenance of a high quality high density rural residential character.
- The proposal is not intended as a staged development towards full urban; rather it is intended to provide a unique residential environment that can stand alone and contribute to the urban fabric of Rangiora like Palmview in east Rangiora, or as Kaiapoi Lakes does for Kaiapoi.

14. Overall, the proposal is not consistent with Chapter 6 but that is more a function of its original purpose when formulated in 2013. Notwithstanding that, the submission for a lower density residential focussed, high quality urban environment that attaches to an existing urban area and that promotes a coordinated pattern of development has planning merit.

Operative Waimakariri District Plan
15. The Site is zoned Rural in the Operative Plan. The minimum lot size for subdivision and a dwelling is 4 ha.
Proposed Waimakariri District Plan
16. The Site is zoned Rural Lifestyle Zone **(LRZ) (Figure 4).** The minimum lot size for subdivision and a dwelling in the LRZ is 4 ha.
17. Oxford Road is a strategic road and Lehmans Road is a collector road.

Figure 5: Proposed District Plan Zoning (site outlined in red)

18. The Site is also subject to, or potentially influenced by, a number of Overlays:
a) Rangiora Airfield Take Off Climb and Approach Obstacle Limitation Surface (**Figure 6**)
b) National Grid Transmission Lines (**Figure 6**)
c) Liquefaction: Liquefaction damage is unlikely (**Figure 6**)
d) Non-Urban Flood Assessment Area (**Figure 7**)

e) Geographic areas: Ecological Area – Plains
f) Ecological District – Low Plains

Figure 6: Rangiora Airfield Take-off and Approach vectors (blue dashed lines); Liquefaction damage unlikely (green)Transmission lines (green lines); Site outlined in red

Figure 7: Non-urban flood assessment & Waimakariri Flood Hazard maps
Blue – medium risk, green – low risk, white – very low

DEVELOPMENT PROPOSAL AND PROPOSED REZONING

19. Subdivision of the Site will create approximately 311 LLRZ D2 lots.
20. The key design drivers for the proposal are:

a) A high amenity premier residential zone with large houses on large sites – average 1500m^2, min 1000m$_2$ based on the St Kilda, Hamilton development concept (**Figure 8**).

b) LLRZ D2 standards would enable a lower density zone in the medium term e.g. 10 years to achieve a high quality consistent character subdivision. If developed as an integrated development subject to an ODP subdivision can be staged for to the proposal.

c) Creating strong connections with the immediate neighbourhood by providing a cohesive interconnected roading layout that picks up direct links to the eastern neighbourhood off Lehmans Road and the northern subdivision roading, and carries them into the Site.

d) Creating a high amenity and diverse residential neighbourhood by providing interfaces to roads, reserves and rural environments.

e) Respecting and building on local identity and character of Rangiora by retaining specific vegetation features from the Site, and anchoring the development into the wider landscape.

21. A development concept can provide for sound urban design by:

a) A hierarchy of movement corridors.

b) Prioritisation of walking and cycling.

c) A north-south alignment of street blocks to maximize solar access and provide for efficient use of lots.

d) Block perimeters being kept as small as practicable to aid permeability and higher public amenity.

e) Enabling a range of housing typologies set in high quality landscape and street setting with generous amenity plantings and curtilage.

Figure 8: St Kilda development images (Bayleys)

22. St Kilda, Cambridge is a premier development on the outskirts of Cambridge, centrally located and with easy access to the Waikato Expressway. It was originally part of a small dairy operation which was dissected by the Waikato Expressway, leaving a portion within the Cambridge Town boundary and the larger balance of the property of approximately 80 ha (which became St Kilda) on the Eastern side of the Expressway, left in the Rural Zone.
23. The initial development concepts were for a Rural Residential type development given the Expressway separation of the existing residential development on the Western side of the Cambridge Bypass, however this was not supported by Council and a new concept of larger residential sections of a 1600m² average size was developed and approved – see https://www.stkilda.nz/page/location/

EFFECTS ON THE ENVIRONMENT

Township growth and urban form

24. The Site immediately adjoins the western edge of urban Rangiora.
25. The WDDS indicated a general preference for the direction of urban growth of Rangiora to the east as a way of balancing up the residential areas around the town centre and some growth to the west.
26. The approach of the WDDS was to signal growth options to be confirmed in the District Plan Review:

The broad directions for greenfield residential growth for the District's main towns are set out in Figures 11 to 14. Further work will be carried out to identify and confirm the exact locations and extent of these residential growth areas, together with the intensification opportunities within existing urban areas. These will be enabled through the District Plan

Review and other planning tools.
27. The Strategic Planning documents clearly signal active consideration of growth needs and growth directions. The options available to the Council were constrained by the approach of the CRPS as the District Plan has to give effect to the CRPS and cannot be
inconsistent with it. The CRPS took effect in 2013 and is overdue for review.
28. The CRPS tightly holds urban growth to the constraints of Map A Chapter 6 and the identified FDAs which although amended by Plan Change 1 in 2020 does not respond to the directions of the NPS-UD. In any event the approach is focused on the need for housing in full urban residential land, less on other residential development forms.
29. As such the Site falls outside the planning policy framework for urban growth. However, in terms of urban form and on the ground, there is considerable merit and logic to conversion of this existing LRZ land to a new high amenity residential form that can be integrated into the Rangiora urban fabric.
30. The proposal has the potential to anticipate the longer term growth path confirmed by the decisions on the RRS to protect the future growth option of more intensive urban development in this direction. It can set a pathway to further westward expansion on land
that holds few if any physical barriers to land development.
31. The proposal will contribute to the housing needs of Rangiora and in a form and location that does not undermine the long run urban form of Rangiora. Planned growth confirmed in the PWDP is already intended to extend westwards out to Lehmans Road and to keep the town edge squared up providing depth to future development and providing a rational basis for providing movement networks driven off the key roads such as Rangiora-Oxford Roads. The West Rangiora Future Development Area confirms this approach. The Site sits in the next block west of Lehmans Road so is not proposing a disjointed urban form, nor one that is not part of the long term thinking of urban form and growth for Rangiora.

32. A full residential zoning is proposed under LLRZ D2 and will provide a high quality street character, overall amenity and passive surveillance over the street, and will create the correct lighting standards, roading standard, fully formed footpaths and cycleways required for a high quality urban environment.

Neighbourhood and wider community effects
33. The Site is serviced by a collector road and is close to an arterial road. This provides for ease of access and safe and convenient movement to and from the Site. A planned development co-ordinated by an ODP can facilitate within the site movement corridors and linkages through the Site to provide for walking and cycling.
34. A key positive neighbourhood and community effect will arise from the existing dwellings and their established gardens and plantings that will anchor new development and provide a point of reference for new dwellings. Development will not be on a bare site; it will take place in an existing established part-residential setting. The transition to a low density, high quality premier residential development will start from a favourable position and minimise the apparent extent and nature of the landscape change.
35. The Site is comparatively large (58.4 ha) and has the potential to support a variety of residential building typologies and this will contribute to a mix of households within the development and provide built form variety and interest in the streetscape. Whilst LLR D2 standards are proposed, it may be that part of the Site is suitable for other higher density forms of development, which would be within scope of the alternative relief, and could be considered as part of the master planning process required for preparation of an ODP (ahead of the hearing). The earlier stages of the St Kilda development were for large lot residential, with more clusters of townhouses included as later stages (and a retirement village). A retirement village is unlikely in this case, given the proximity of the Charles Upham Retirement Village.
36. Rangiora is well-positioned to accommodate and service the needs of a fast-growing resident population that will in turn support more business activity, schools, community facilities and community organisations.

Effects on tangata whenua values
37. The Proposed District Plan does not identify any Sites and Areas of Significance to Maori in the Site, but the nearby Rakahuri/Ashely River identified as SASM-025. This has been scheduled as being
River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species
38. The PWDP has Policy SASM-P8 which is relevant to pre-development processes:
Engagement with rūnanga
Te Ngāi Tūāhuriri Rūnanga and the District Council to encourage engagement with the Rūnanga priorto persons undertaking activities and/or applying for resource consent where the activity has thepotential to adversely affect identified sites or areas of Ngāi Tūāhuriri cultural significance. Where priorengagement with Te Ngāi Tūāhuriri Rūnanga h as not been undertaken by an applicant for an activitythat has the potential to adversely affect an identified site, the District Council will consult with the Rūnanga.
39. The Site is not listed as an archaeological site on the NZ Archaeological Site database.

Landscape and visual effects
40. Rural Lifestyle style development exists on the Site now (a series of 4 ha lots with a dwelling and associated accessory

buildings on each). The landscape is dominated by shelter belts, utility buildings, significant trees and planted curtilages around dwellings many of which are well set back off the roads down RoWs.
41. An ODP will help to achieve an integrated, cohesive and coherent development The proposal will lead to a modification of the landscape of the Site from a predominantly lifestyle block landscape to a denser semi-urban environment dominated by residential building that will, in time, get the benefit of street tree and reserve plantings and landscape treatments around the houses.
42. The visual effects which will arise from a change in the number of vegetative and built elements in the landscape are significant, but not avoidable, if the Site is to contribute to the on-going growth of Rangiora. The change will contribute to a high quality amenity and quality of environment and one that will be entirely consistent with and supportive of the rural lifestyle residential development that has successfully established on the Site.

Well-functioning urban environments
43. The Site adjoins the existing built up urban area of Rangiora. Immediately to the east are existing or developing residential areas.
44. The conversion of the Site from present rural lifestyle uses to low density, high quality residential will continue a pattern of outward expansion of Rangiora. Such a change may not be consistent with the PWDP's identification of a Future Development Overlay for west Rangiora only as far west as Lehmans Road, but on the ground it will look and integrate as part of the urban fabric.
45. It will provide some replacement lower density living areas for the existing LLR zones at north west Rangiora – but at much more appropriate higher density that the LLR D1 standard which is 1-2 hh/ha. There are two such areas, shown on the planning maps below. River Road has an 'urban overlay' and is intended to be intensified to urban densities. The land on the opposite (east) side of Lehmans Road is a 'legacy' rural residential zoning which applies under the Operative District Plan. The landowners have developed the adjoining residential subdivision and wish to develop the land for full urban residential development. Services are in place to support this. The constraint to date has been Map A of the CRPS which does not include the land as a Greenfield Priority Area or Future Development Area, GR zoning of this land is consistent with the NPS-UD.

Figure 9: PWDP as notified – LLRZs shown in light grey. Diagonal stripes – urban growth overlay.
Site outlined in red.
46. Rangiora is growing apace. It is attracting significant interest from new home buyers as people respond to the significant investment in upgraded transport links (Northern Corridor and public transport) and a growing economic base for employment within the District and the City.
47. Rangiora has excellent connectivity to the City, both via the new Northern Corridor, and a nascent cycleway link into the City. There is a very regular bus service every half hour.(the No 1 Blue Line) The standard trip takes 70 minutes, and there is a twice daily weekday morning express service from Rangiora, and seven times weekday express out to Rangiora all via Kaiapoi.
48. The Site will step out the western edge of Rangiora, but as it exists in a peri-urban form now, such a change does not alter how the Site interacts with Rangiora as a whole. It is in many ways a functional part of urban Rangiora now; it's only the Zone boundaries and policy framework that create the sense of it not being part of Rangiora.
49. The Site is convenient to the Rakihura/ Ashley recreation trails, the racecourse, Arlington Park, and the airfield. The town centre is easily accessible.
50. The following assessment of the criteria in the NPS-UD for determining a well-functioning urban environment shows that the proposed rezoning will deliver urban, housing and residential outcomes that meet those criteria. There will be a variety of homes enabled by generous lot sizes. The Site is well-positioned, building as it does on an existing township well-serviced by public transport and cycling options, to provide good accessibility to jobs, community services, and open spaces, as well as mitigating climate change impacts and future natural hazards by being not near the coast and well removed from major rivers.

NPS-UD Policy 1

Planning decisions contribute to well functioning urban environments, which are urban environments that, as a minimum:	**Assessment**

(a) have or enable a variety of homes that: (i) meet the needs, in terms of type, price, and location, of different households; and (ii) enable Māori to express their cultural traditions and norms;	The proposal is to have larger lots supporting predominantly standalone dwellings and associated accessory buildings (including generous sized garaging) in an open landscaped garden setting. This will fill a gap in the range of housing typologies available at Rangiora and contribute to a better functioning urban environment overall at Rangiora. It is not necessary for each individual rezoning proposal to have a wide range of housing typologies, and in some circumstances this may not be appropriate. The rezoning will deliver a premier high amenity urban subdivision with generous sized lots which will complement existing and planned higher density residential development at west Rangiora. There is scope with the relief sought for a mix of residential densities. The appropriateness of this can be considered at the master planning/ODP stage. The Site has the potential to create a unique urban environment in Rangiora. It can follow the example of Palmview based on a lake or Kaiapoi Likes providing a niche housing option in Rangiora and the District meeting a need for residential land not constrained to GRZ standards.
(b) N/A business sectors	
(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and	The Site has access to a collector road and a strategic road providing easy access to key community amenities and facilities. The town is served by a public bus route to the city, and a cycle trail connecting to Kaiapoi and the City. The new West Rangiora Development Area adjoins the Site to the south. The Site will become closer to Rangiora public transport routes as they extend out to service this new growth area over time. The Site is in walking distance to Arlington Park and the Rakahuri/Ashley which contains abundant recreations pace. It is easily accessible to the town centre and within walking distance to the Huntingdon Drive local centre.
(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and	The demand for housing and land in Rangiora is largely ahead of the planning means to respond. This proposal will “top up” the land presently set aside in the PWDP and provide a useful buffer to demand. The Site owners have been keen to release this land for more intense development for some time; there is no prospect of land banking.
(e) support reductions in greenhouse gas emissions; and	The Site has significant advantages in being easily accessible to the town centre and reserves, community facilities and schools. The proposal retains a consolidated form to Rangiora with good connectivity and linkages to recreation space and commercial centres reducing the need for car travel.
(f) are resilient to the likely current and	The Site is within the area of influence of a major river but the non-urban flood assessment maps do not show extensive flooding likely at the Site.

future effects of climate change	Being inland it is not at risk from climate change induced extreme natural hazard events like sea level rise. or river flooding.

Effects on ecosystems and habitats

51. The Site is currently used for a mix of low intensity (grazing) farming, and lifestyle purposes. Shelter belts and utility buildings have been established

52. The Site has been identified in the PWDP with two ecological overlays (the PWDP ecological overlay – Plains and Low Plains Ecological District). They are a district-wide overlays and no specific ecological values have been identified in the Proposed Waimakariri District Plan. These overlays seek primarily to retain indigenous vegetation. The PWDP identifies SASM 025 nearby the Site. That is a Site and Area of Significance to Maori and in SASM - Schedule 1 is identified as *being River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species.*

Effects on natural and physical resources

53. The Site drains in a SE direction towards the newly developing residential area.

54. There will be a degree of site disturbance as part of creating the roading network, and reserves, and as part of curtilage development on each lot.

55. The proposed use for residential activity inevitably leads to loss of some rural productive potential as land owner intentions are not about farming or productive use of the land, but lifestyle use and enjoyment. Built forms and hard surfaces become more dominant.

56. The Site comprises 4ha bocks now and these are not able to be used effectively for productive purposes other than for intensive productions based on tunnel housing and other supported production systems. None exist in the Site now.

57. The Site contains Class 2 and Class 3 soils as defined in the NZ Land Use Inventory (Landcare Research) Land Use Capability classes 1-3 **(Figure 10)**. Productive use of these soils other than for low level purposes i.e. grazing, is not feasible given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production).

Figure 10: Site soils: Site outlined in red; (Canterbury Maps)
Class 2 soils: bright green/Class 3 soils: light green;

Discharges of contaminants into the environment

58. There will be no discharges of contaminants into the environment. Wastewater will discharge to the Council's reticulated system.

59. Stormwater discharges will potentially be to ground given ground conditions or to an approved and consented stormwater management and treatment area which will meet all relevant Council standards.

Risks from natural hazards or hazardous installations

60. The PWDP planning maps show the Site as being within a Non-Urban Flood Assessment Area.

61. The District Plan maps do not identify high flood hazard areas or high coastal flood hazard areas, rather these are identified through the flood assessment certification process. This enables the most up-to-date technical information to be used. However, as a guide, areas that are potentially high hazard can be identified through the Waimakariri District Natural Hazards Interactive Viewer (NH - Introduction).

62. Rules that refer to a Flood Assessment Certificate require a certificate to be obtained from the District Council to determine compliance with the relevant rule. The alternative is to apply for resource consent as set out in the rule.

63. Rule NH-R2 states
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;

64. Assessment of flood risk and consequence can be undertaken at subdivision stage.

65. There will be no hazardous installations proposed on the Site.

Geotechnical assessment
66. The PWDP planning maps show the Site as being “Liquefaction damage is unlikely. Standard investigation procedure outlined in NZS3604 is appropriate”.

Contaminated land
67. A Preliminary Site Investigation can be carried out for the Site at subdivision stage.
68. An enquiry of ECAN has identified that two sites at the northern end of the Site potentially contain some contaminated land, which can be investigated further at subdivision stage **(Appendix 6)**. 315 Lehmans Road is an unverified HAIL site (previous use for clay target shooting) and 317 is registered as containing uninvestigated persistent pesticide bulk storage.

Servicing
69. Proposals for servicing the Site and the effects from such servicing in relation to domestic water supply, wastewater, stormwater, roading, and telecommunications will be required for any subdivision consent.

Economic effects
70. It is anticipated that urban development will generate positive economic effects, both from the investigation/development phase and for the longer run economic activity from householders participating in the local economy.

Climate Change effects
71. An assessment of the effects of the proposed rezoning on climate change is included as part of the assessment of a well-functioning urban environment above.
72. A well-functioning urban area that is designed and serviced in an integrated manner, applying sound urban design principles, will enable a reduction in greenhouse gas emissions compared to unplanned, ad hoc development that does not create compact urban forms located where the services and benefits of existing, established urban areas are not readily accessible.
73. There is a triangle of planning influence that can be brought to bear on reducing greenhouse gas emissions
a) Compact urban form minimising distances between homes and work/play options.
b) Proximity of homes to community facilities, services and amenities and business/work areas.
c) Design and provision of movement corridors and linkages that create opportunities other than for vehicles for getting around.
74. The Site of the proposed rezoning:
a) Helps in retaining a compact urban form to Rangiora.
b) Is easily accessible to the town centre and is located convenient to the recreation resources of the nearby Rakahuri/Ashley River, the airfield and racecourse and Arlington Park.
75. Rangiora has excellent connectivity to the City, both via the Northern Motorway, the new Northern Corridor, a cycle way link to Kaiapoi which is linked to the new north city cycle way along the Northern Corridor and a very regular bus service.

Positive effects
76. The proposed rezoning will provide for the continued growth of Rangiora by managing the development through an ODP. The proposal will provide a buffer to on-going high level demand for lots in Rangiora. It will cater for a specific housing need not found in GRZ Zoned land nor LLRZ land. The proposed rezoning is anticipating a form of development that is a much more efficient use of a qualifying site supporting a well-functioning urban area. It is a positive endorsement of Rangiora as a growth node in the District.
77. The benefits derived from a planned ODP approach include facilitating high levels of connectivity, creating community links to identified focal points. The Site is close to recreation facilities. A coordinated and integrated development will provide a distinctive environmental quality and point of difference to the development.
78. The Site adjoins existing and developing residential development on the western edge of Rangiora.
79. From a community well-being perspective, the provision of additional land for residential growth will continue to support the Council’s investment in community infrastructure by maintaining and facilitating growth rates, increasing the rating base and attracting development contributions.

STATUTORY PLANNING ASSESSMENT
80. Submissions must be assessed under the provisions of the RMA, including Part 2 and Section 32 (Requirements for Preparing Evaluation Reports).

National Policy Statements
National Policy Statement on Urban Development Capacity (NPS-UD)

81. The NPS–UD applies to this proposal as it is directed at Tier 1 urban environments, and Tier 1 local authorities which includes Waimakariri District as part of the Christchurch urban environment that is defined in Table 1 of the NPS, and additionally defined as:

any area of land (regardless of size, and irrespective of local authority or statistical boundaries) that: is, or is intended to be, predominantly urban in character; and is, or is intended to be, part of a housing and labour market of at least 10,000 people.

82. The NPS-UD recognises the national significance of:

a) Having well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future; and

b) Providing sufficient development capacity to meet the different needs of people and communities.

83. The NPS outcomes are to be achieved through objectives that address:

a) Planning decisions improving housing affordability by supporting competitive land and development markets.

b) Regional policy statements and district plans enabling more people to live in areas of urban environments near centres or areas with employment opportunities, area well serviced by public transport or a high demand for housing in the area.

c) Urban environments developing and changing over time in response to diverse and changing needs of people, communities and future generations.

d) Local authority decisions on urban development being integrated with infrastructure planning and are strategic over the medium term and long term.

e) Local authority decisions on urban development are responsive particularly for proposals supplying significant development capacity.

f) New Zealand's urban environments support reductions in greenhouse emissions and are resilient to current and future effects of climate change.

84. The key method to achieve these objectives is by development of a Future Development Strategy (FDS). This will set out how the Councils will provide for sufficient development capacity over the next 30 years to meet expected demand. There is no FDS for the greater Christchurch Urban Area that meets the requirements of the NPS-UD.

85. Work on development capacity completed for the NPS - UDC 2016 by the Greater Christchurch Partnership as an Update of the existing Urban Development Strategy (UDS) – Our Space 2019 confirmed what there was a shortage of feasible development capacity for future housing in Waimakariri District for the medium (next 10 years) and long term (10 to 30 years) periods. That assessment is now out of date as it does not address the requirements of the NPS-UD; and rates of take up of land have exceeded projected rates.

86. One of the key changes in the NPS-UD is that local authority decisions on urban development that affects urban environments are responsive, particularly to proposals that would supply significant additional capacity. It also amends the required methodology for housing and business capacity assessments.

87. The current CRPS does not meet the new NPS-UD requirement in relation to proposals for significant additional capacity. Regional councils are required to include criteria in the RPS to determine what plan changes will be treated for the purposes of Policy 8 as adding significantly to development capacity as soon as practicable. ECAN has yet to respond to this requirement.

88. The NPS-UD has immediate effect, so in the meantime, proposals such as this submission must be assessed in the context of the overall intent and purpose of the NPSUD as articulated in the NPS-UD objectives and policies. This includes that NZ has well-functioning environments; provides sufficient development capacity to meet the different needs of people and communities; planning decisions improve housing affordability to contributing to competitive house and land markets; and RMA plans enable more people to live near major employment areas, where there is existing or planned public transport, and where there is high demand for housing.

89. The NPS-UD is the higher order document and its requirements override those of lower order documents where there is a conflict, including regional and district RMA plans.

90. Key objectives and policies in the NPS-UD are assessed here:

NPS-UD Objective/Policy	**Assessment**
Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	The proposed development will further enable Rangiora to sustain itself as a well-functioning urban environment by consolidating the residential area close to the town centre, and provide residential development close to public transport links and existing community and commercial facilities including Huntingdon Drive local centre. The proposal provides choices in the Rangiora housing market and in doing so

Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.	supports housing affordability. Whilst the proposal is for a premier larger lot urban residential development, it is important that all sectors of the market are catered for. This will be more affordable than forcing those wanting large sections out to the much larger and very limited areas of LLR D1 development, or having to purchase 2-3 sections in a standard residential subdivision. There Site is in multiple ownership and the landowners are working together to achieve the rezoning. It will bring more competition into the market by bringing new entrants into the market.
Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply: the area is in or near a centre zone or other area with many employment opportunities the area is well-serviced by existing or planned public transport there is high demand for housing or for business land in the area, relative to other areas within the urban environment.	The CRPS is due for review in 2024 but in the meantime the existing CRPS is not in accordance with the NPS-UD 2020. The proposed rezoning is on the edge of the District's largest centre, which offers a wide range of community and business services, and employment opportunities. It is expected that a proportion of future residents will commute outside the township, but as the township and associated business areas e.g. at Southbrook, continue to grow, this is expected to become proportionally less. Rangiora is well serviced with public transport, there is scope for future mass transit PP, and there is a high demand for housing at Rangiora. The Site adjoins the new West Rangiora Development Area, to the south. Extensions of public transport to service this growth area will be readily accessible to the Site.
Objective 6: Local authority decisions on urban development that affect urban environments are: integrated with infrastructure planning and funding decisions; and strategic over the medium term and long term; and responsive, particularly in relation to proposals that would supply significant development capacity.	Whilst not currently identified as a future growth area in RMA documents, the Site is well placed at the township edge to be serviced by existing infrastructure. Some upgrades may be required, which will be investigated further with Council prior to the hearing. See Policy 8 below for commentary on proposals which supply significant development capacity
Objective 8: New Zealand's urban environments: support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change	The proposal adjoins the existing built up are of Rangiora, close to public transport links. Its excellent accessibility to Christchurch City, substantially enhanced with the new Northern Motorway extensions, means it is now highly accessible to these nearby major employment areas. Travel distances are relatively short, minimising vehicle miles and the potential for greenhouse gas emissions. There is a cycleway link from into Christchurch City, and regular bus services, including an express route. The Site is inland and not subject to natural hazard risks associated with sea level rise arising from climate change.
Policy 1 – Planning decisions for well-functioning urban environments	Assessed at para 41-50
	The proposed rezoning is anticipated to provide sections that will be available for the short term (up to 3 years) and into the medium term (3-10 years) if adopting a more conservative outlook.

Policy 2 - Sufficient development capacity Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.	The locational and amenity advantages of Rangiora also favour strong ongoing demand. The PWDP UFD-O1 Feasible Development Capacity for residential activities identifies the need for 6300 residential units in the period 2018-2028, and 7100 residential units 2028-2048. These numbers are derived from Chapter 6 CRPS Table 6.1. and are out of date. Data from the Council (November 2021) confirms that there are about 800 vacant lots in Rangiora. Building consents are at about 180/year. That means there is about 4 years vacant land supply. A lead in time of 3-5 years is needed to go from rezone to house build so the Council is facing an unnecessary squeeze on land availability. That will translate in to an upward shift in land and section prices as has been the case at Rolleston. The data suggests that the PWDP will be late to the party to ensure there is at least sufficient development capacity to meet expected demand for housing land over the short term, medium term, and long term. There is a looming, inevitable land supply issue so any proposal to add capacity will push the Council closer to meeting the requirements of the NPS-UD. The proposal is consistent with ensuring there is at least sufficient land supply for housing.
Policy 8 – Responsiveness to plan changes Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is: (a) unanticipated by RMA planning documents; or (b) out-of-sequence with planned land release	The proposed rezoning is not anticipated by RMA documents - it is not a Greenfield Priority or Future Development Area in the CRPS, or a New Development area in the PWDP. A responsive approach to the proposal is required as it meets the Policy 8 criteria for unanticipated zoning. It will contribution to well functioning urban environments and will add significant development capacity. There is no development capacity for the housing typology proposed – so any provision is significant in this context. The development will deliver appx 311 high amenity large lot residential sites at an average density of 1500m2. This will be higher if a mix of densities are proposed, which may be appropriate in some parts of the Site, dependent on master planning work to follow.

91. Adopting the submission to re-zone the land, and enable the proposed development on the submission Site will satisfy the objectives and policies of the NPS-UD.

Proposed National Policy Statement for Highly Productive Land (NPS-HPL)

92. The Government proposed in 2019 a NPS-HPL to prevent the loss of productive land and promote its sustainable management. The overall purpose of the proposed NPS-HPL is to improve the way highly-productive land is managed under the Resource Management Act 1991 (RMA) to:

a) Recognise the full range of values and benefits associated with its use for primary production
b) Maintain its availability for primary production for future generations
c) Protect it from inappropriate subdivision, use, and development.

93. The NPS-HPL is still a proposal and not intended to take effect until after Gazettal. At the date of this submission the NPS-HPL has no effect and no assessment of it is required for the purposes of this submission.

94. The Proposed NPS-HPL interim definition of HPL is land defined as Land Use Capability Class 1-3 soils. A portion of the Site contains Class 2 and 3 soils (see **Figure 10)**. Highly productive use of these soils is not realistic given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production). Its present use as lifestyle blocks, low level grazing and agistment is the more likely long run use of the Site if not rezoned.

95. Objective 3 of the Proposed NPS-HPL specifically refers to highly productive soils being protected by avoiding *"uncoordinated urban expansion on highly productive land that has not been subject to a strategic planning process"*.

The Site was assessed through a strategic planning process (WDDS 2018) and the RRS as a preferred site for LLRZ development, and rejected for a change in zoning on the basis that it may be required for long term urban growth of Rangiora.
96. It is therefore considered that this submission to re-zone the Site is largely in accordance with the Proposed NPS-HPL.

National Planning Standards

97. The National Planning standards prescribe various matters under the RMA so that there is consistency among planning documents most relevantly here in terms of appellations for zones, and the standards applying to these zones.
98. The proposed rezoning adopts the standard zone appellation, in this case LLRZ as contained in the PWDP.
99. The PWDP identifies plan standards for minimum and average net site areas for the respective zones. These are modified for the proposed rezoning as a higher density LLRZ.
100. The higher density LLR zoning is entirely consistent with the NPS purpose for the LLRZ as reproduced below. In this case, the principal constraint to more intensive development is the peri-urban location where a lower density transition to the rural environment is appropriate (particularly noting that the zone boundary is 'mid block' so there is no natural or physical buffer between rural and residential areas); the existing pattern of 4 ha lots with existing substantial homes and gardens; and the fact that the premier large lot subdivision proposed relies on consistency of housing quality and character to be deliver on this vision for the area.

Large lot residential zone

Areas used predominantly for residential activities and buildings such as detached houses on lots larger than those of the Low density residential and General residential zones, and where there are particular landscape characteristics, physical limitations or other constraints to more intensive development.

Low density residential zone

Areas used predominantly for residential activities and buildings consistent with a suburban scale and subdivision pattern, such as one to two storey houses with yards and landscaping, and other compatible activities.[2]

Canterbury Regional Policy Statement 2013 (CRPS)

101. Chapter 6 of the RPS *"provides a resource management framework for the recovery of Greater Christchurch, to enable and support recovery and rebuilding, including restoration and enhancement, for the area through to 2028. Recovery in Greater Christchurch is also supported by the provisions in Chapter 5 notated as 'Entire Region'. The provisions in the remainder of the RPS also apply.3"*
102. An assessment of the proposed rezoning against the relevant CRPS Objectives and Policies is set out in **Appendix 1**. This should be read in the context of the CRPS being overdue for review and that it does not provide a regional response to the NPS-UD. The
need to focus on earthquake recovery has now passed and so many of the directive provisions need to be given appropriate 'weight' in a new national policy environment with a focus on flexible, responsive panning approaches that better provide for people's needs and well-being.
103. That assessment shows that

a) The development proposal achieves the objectives for the location, design and function of new developments (Objective 5.2.1)

b) The traffic effects of the proposal are unlikely to give rise to adverse effects and so achieves CRPS objectives for the strategic land transport network (Policy 5.3.7)

c) The Site falls outside the FDAs shown on Map A of Chapter 6 and in that regard is inconsistent with RPS Policy 6.2.1 clauses 1 to 3.

1. identifies priority areas for urban development within Greater Christchurch;

2. identifies Key Activity Centres which provide a focus for high quality, and, where appropriate, mixed-use development that incorporates the principles of good urban design;

3. avoids urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS

d) The environmental effects assessment outlined above establish that the proposed development is consistent and will not give rise to any concerns with respect to all the matters listed in RPS Policy 6.2.1 clauses 4. to 11. These matters are:

6.2.1 Recovery framework

Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that:

1. As above;

2. As above;

3. As above;

4. protects outstanding natural features and landscapes including those within the Port Hills from inappropriate subdivision, use and development;

5. protects and enhances indigenous biodiversity and public space;
6. maintains or improves the quantity and quality of water in groundwater aquifers and surface waterbodies, and quality of ambient air;
7. maintains the character and amenity of rural areas and settlements;
8. protects people from unacceptable risk from natural hazards and the effects of sea-level rise;
9. integrates strategic and other infrastructure and services with land use development;
10. achieves development that does not adversely affect the efficient operation, use, development, appropriate upgrade, and future planning of strategic infrastructure and freight hubs;
11. optimises use of existing infrastructure; and
12. N/A

e) The proposed rezoning achieves policies relating to:
- Sustainability;
- Integration of transport infrastructure and land use;
- Urban design; and
- Biodiversity, natural hazards, landscape, soils, contaminated land.

104. In terms of the CRPS polices for rural residential developments (Policy 6.3.9) the proposal sits square with all policy matters other than being a location identified in an adopted Rural Residential Strategy; and being at a higher density than provided for under this policy (ie greater than 1-2 hh/ha). As such it has a majority of features entirely consistent with the policy.
105. The CRPS includes housing capacity targets as below

6.2.1a Targets for sufficient, feasible development capacity for housing [inserted in accordance with sections 55(2) and 55(A) of the Resource Management Act 1991, from the National Policy Statement on Urban Development Capacity 2016]
For the period 2018-2048, sufficient, feasible development capacity for housing is enabled in Greater Christchurch in accordance with Table 6.1.
Table 6.1 Targets for housing development capacity in Greater Christchurch, 2018-2048

106. These derive from Our Space, under the requirements of the then NPS-Urban Development Capacity 2016, since replaced by the NPS-UD 2020. The targets (known as bottomlines in the NPS-UD) are to be treated as 'minimums' not 'maximums'.
Policy 6.3.12
enables urban development in the Rangiora and Kaiapoi FDAs (new Development Areas in the PWDP) where needed to meet the medium term targets. This a 'minimum' allocation approach contrary to the NPS-UD. The NPS-UD favours over allocation, including in locations unanticipated by RMA plans, where it will add additional development capacity, can be integrated with infrastructure planning and funding, and will contribute to well functioning urban environments – as is the case the proposed Lehmans LLR D2 zone.
107. The proposed Lehmans LLR D2 zone is consistent with the CRPS except with respect to those parts of the CRPS which are out of step with and do not give effect to the higher order plan, the NPS-UD.

Proposed Waimakariri District Plan
108. An assessment of this proposal against the relevant PWDP Objectives and Policies for urban growth and development as notified on 17 September 2021 is set out in **Appendix 2.**
109. That assessment shows that the proposed rezoning is entirely consistent with the relevant objectives and policies, including as sought to be amended by this submission. Those amendments are to UFD-P3 Identification/location and extension of Large Lot Residential Zone areas; and LLRZ-O1 and LLRZ- P1-5 and reflect the intent and outcomes intended for the proposed LLRZ D2 zone, which is a higher density LLRZ zone than the PWDP LLRZ zone (renamed LLRZ D1 in this submission).

ASSESSMENT AGAINST OTHER PLANNING DOCUMENTS
Our Space 2018-2048 Greater Christchurch Settlement Update (2019)
110. Our Space is a non-statutory document prepared under the Local Government Act. It
"responds to the new Government Policy Statement on Land Transport, which has increased funding for mass public transit schemes, and meets the requirement of the National Policy Statement on Urban Development Capacity (NPS-UDC) 2016 to prepare a
future development strategy…. Specifically, it:
• sets out how targets for housing for the next 30 years will be met, accommodating an additional 150,000 people;
• identifies locations for housing growth, encouraging Central City and suburban centre living while providing for township growth in Rolleston, Rangiora and Kaiapoi;…

• *promotes a compact urban form, which provides for efficient transport and locates development in a manner that takes into account climate change and sea level rise.[4].*

..Underpinning this settlement pattern approach is the vision for a transformation of the transport network that fosters much greater public and active transport usage, and reduced reliance on the private vehicle.

111. Our Space acknowledges that this will require commitment from the Government to invest in the necessary improvements to our transport system, which could include investing in rapid transit services. To date, there has been no successful business case for improved public transportation, including not as a Covid 19 fast track infrastructure project.

112. The Our Space housing capacity targets (Table 3) and Future Development Areas are related to growth of urban areas.

113. Our Space, like the CRPS (and the Operative District Plan) are now out of date, as they do not reflect or give effect to the new requirements of the NPS-UD.

Waimakariri 2048 District Development Strategy (WDDS)

114. The preferred growth directions for Rangiora in the WDDS 2048 (2018) are outlined above (under 'Site') i.e. westwards to Lehmans Road, and otherwise eastwards. However, the Council in its decision on the RRS, recognized west of Lehmmans Road as a potential longer town urban growth area.

115. The WDDS Rangiora Snapshot (pp38-39) -when looking ahead to 2048 proposed that:

a) Rangiora remains the District's largest town
b) 30,000 – estimated population (2048)
c) 12,025 – estimated households
d) 5,025 - new households in Rangiora
e) Continues to accommodate one third of the District's residential growth
f) 167 – estimated annual building consents for new dwellings for the next 30 years
g) 423 hectares of additional feasible residential land required by 2048 (this includes capacity in remaining stages of existing residential developments as well as new greenfield areas inside and outside of the Infrastructure Boundary)
h) Future residential growth directions proposed to the east (predominantly) and west of the current town
i) Opportunities for intensification/regeneration to be identified
j) New growth directions take into account areas of unacceptable natural hazard risk and areas of significant environmental and cultural values
k) New growth areas to connect into existing sewer and water networks
l) Stormwater Levels of Service designed to meet increased performance requirements

116. At the 2018 Census Rangiora had a population of 17,841, and 7314 total dwellings (incl those unoccupied and under construction). Population projections for the District show an average annual change 2018-2020 of 1700 persons. If Rangiora continues to attract a third of all district growth as stated in the WDSS then Rangiora's population in 2021 will be around 18,900.

Mahaanui Iwi Management Plan

117. Part 1 of the PWDP in a section "Mana Whenua" sets out the position with respect to iwi and the review of the district Plan:

a) The District's territorial area sits within the takiwā (territory) of Ngāi Tūāhuriri which is one of eighteen Ngāi Tahu regional papatipu rūnanga, constituted under the ***Te Rūnanga o Ngāi Tahu Act 1996*** *to represent* ***mana whenua*** *interests.*

b) The preparation and change of a district plan must take into account relevant iwi documents. For the District, Ngāi Tahu has set out its resource management values, issues, objectives and policies within the Mahaanui Iwi Management Plan (2013).

c) The Mahaanui Iwi Management Plan identifies objectives, issues and policies for natural resource and environmental management for six pāpatipu rūnanga (including Te Ngāi Tūāhuriri Rūnanga). It seeks to ensure that the taonga and resources of Ngāi

Tahu mana whenua are recognised and protected in the decision-making of statutory agencies. The Mahaanui Iwi Management Plan contains a comprehensive suite of policies and objectives addressing the range of resource management matters of significance to tangata whenua. The District Council shall have regard to the Mahaanui Iwi Management Plan when preparing or changing the District Plan, to the extent its content has a bearing on resource management issues of the District.

118. The Mahaanui Iwi Management Plan (MIMP) 2013 was released on 1 March 2013.

119. The MIMP is a tool for tangata whenua to express their identity as manawhenua and their objectives as kaitiaki, to protect their taonga and resources, and their relationships with these. The MIMP seeks to ensure that these taonga and resources are recognised and protected in the decision-making of agencies with statutory responsibilities to tangata whenua. Importantly it is also a tool

that assists Papatipu Rūnanga representatives to articulate their values, issues and policy into statutory processes.
120. The MIMP includes both general objectives and policies about the management of land, air, and water, and also includes catchment specific objectives and policies.
121. Section 5.3 Wai Maori (pp77-98) contains an extensive discussion about tangata whenua rights and interests in freshwater. It provides a suite of Issues, Objectives and Policies for freshwater
122. Section 5.4 Papatuanuku (pp101-124) sets out the Ngai Tahu Subdivision and Development Guidelines that are to be read along-side objectives relating to:

a) Land use planning and management in the takiwā reflects the principle of Ki Uta Ki Tai. (from the mountains to the sea)

b) Rural and urban land use occurs in a manner that is consistent with land capability, the assimilative capacity of catchments and the limits and availability of water resources.

c) Inappropriate land use practices that have a significant and unacceptable effect on water quality and quantity are discontinued.

d) Ngāi Tahu has a prominent and influential role in urban planning and development.

e) Subdivision and development activities implement low impact, innovative and sustainable solutions to water, stormwater, waste and energy issues.

123. Section 5.5 Tane (pp127-137) includes objectives that focus on:
a) Regional policy, planning and decision making in the takiwā reflects the particular interest of Ngāi Tahu in indigenous biodiversity protection, and the importance of mahinga kai to Ngāi Tahu culture and traditions.
b) The customary right of Ngāi Tahu to engage in mahinga kai activity is recognised, protected and enhanced…
c) Customary use, and therefore mahinga kai, is given effect to as a first order priority for freshwater management in the takiwā.
124. Section 6.4 (pp213-224) addresses issues of particular significance to the lands and waters of the Waimakariri catchment within which the Site lies.
125. Relevant Objectives relating to urban development of land in that catchment include:

a) The natural "energy, vitality and life" of the Waimakariri River as a braided river is protected and restored.

b) The discharge of contaminants to the Waimakariri and its tributaries is eliminated.

c) Water quality and flows in the Waimakariri and its tributaries are improved to enable whānau and the wider community to have places they can go to swim and fish.

d) The mauri and mahinga kai values of the Waimakariri and its tributaries and associated springs, wetlands and lagoons are protected and restored; mō tātou, ā, mō kā uri ā muri ake nei.

126. A key issue relating to subdivision and development is that subdivision and development activities in the lower catchment have the potential to adversely affect Ngāi Tahu values such as waterways, mahinga kai and sites of significance (Issue Wai4).
127. The proposal provides for full urban reticulation of the three waters and is consistent with the objectives and policies contained in Chapters 5.3 and 5.4 of the MIMP. The proposal does not preclude individual land owners from installing rainwater collection and use from roof areas at the time of building development.
128. The proposal has been designed taking into consideration the potential effect of resultant subdivision and development on the rivers and streams that flow into the lowland rivers.
129. Overall it is considered that the proposal will not have adverse impact on the cultural values of iwi as set out within the MIMP.

SECTION 32 ASSESSMENT

130. A Section 32 assessment is contained in **Appendix 3.**
131. In summary, the PWDP zoning and associated rules (RLZ Zone with a minimum lot size for subdivision and a dwelling 4ha) do not meet the needs and aspirations of the current owners.
132. Strategic Council planning documents (specifically the WDDS) have a focus on only meeting urban growth demands within urban environments of existing towns. They favour intensification (15hh/ha) and a strict allocation of capacity by development areas. It is a control and command regime consistent with Map A of Chapter 6 of the CRPS but is out of step with the requirements of the NPS-UD which requires a more flexible, responsive approach, prohibits a hard fixed unmoveable urban/rural boundary.
133. This approach leaves little room for new proposals or proposals that do not sit square with the standard array of GRZ/medium density or SETZ (Settlement Zone). SETZ applies to some of the District's smaller settlements outside Greater Christchurch.
134. Neither LRZ nor Large Lot Residential (LLRZ) as notified in the PWDP is an efficient use of this block of land located as it is immediately adjoining the urban area of Rangiora, and in a location easily accessible to the town centre by active transport modes as well as car and several district reserves.
135. If this Site is not zoned for LLRZ D2 (minimum average lot size 1500m^2) use to enable residential re-development then it will drive pressure to re-zone elsewhere. That step potentially will not have the significant benefits to Rangiora long term in relation to enabling a well-functioning urban environment that enables people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future. Additionally re-zoning to LLRZ D2 will contribute to providing additional development capacity to meet the different needs of people and communities in a planned manner and

consistent with the NPS-UD.
136. The Site can readily be developed to reflect the principles of the Urban Design Protocol with values of character, context, and connectivity.
137. The Section 32 assessment concludes that the proposal to re-zone the Site from LRZ zone to LLRZ D2 Zone (average lot size 1500m$_2$) is the most appropriate method for achieving the objectives of the proposal, than the other alternatives considered.
138. Option 2 identified in the s 32 assessment is consistent with some PWDP policies notwithstanding that it does sit square with the strategic intentions signaled in the WDDS and the PWDP approach to providing for development capacity and urban development.
139. Option 2 identified in the s 32 assessment to re-zone the Site is the most appropriate given:

a) The proposals adopt the PWDP zones, development and activity standards with appropriate amendments. This ensures continuity of the District Plan anticipated environmental outcomes and urban amenity for Rangiora and adjoining residential areas;

b) Will be consistent with and give effect to many of the relevant PWDP objectives and policies;

c) It is a logical extension to the developed and developing residential land adjoining the Site while achieving a compact, efficient urban form that removes pressure on isolated rural land elsewhere around Rangiora.

d) It gives effect to the NPS-UD, specifically Objective 6 c) and Policy 8, delivering significant additional development capacity and contributing to a well functioning urban environment.

e) It is assumed that there will be capacity in the public utilities and the existing road network, including planned upgrades, to accommodate the traffic effects of the redevelopment;

f) The proposed Site specific ODP will provide certainty of the final form and disposition of the re-zoned area including its proposals for reserves, roading, future linkages for pedestrian and vehicular traffic.

140. The re-zoning proposal is considered to be appropriate to achieve the sustainable growth and development of Rangiora.
141. The economic, social and environmental benefits of the proposed rezoning outweigh any potential costs.
142. The overall efficiency and effectiveness of the proposed rezoning (Option 2) is high, in comparison to the alternative options set out in the s 32 Assessment which are low (Options One and Four) or low to moderate (Option Three).
143. The PWDP proposes to release land for development in the new Development Areas at Rangiora and Kaiaipoi through a novel and untested certification process that is not clearly derived from RMA statutory powers, nor Local Government Act 2002 (LGA) authority. This approach is not proposed for the LLR Overlay areas. As the proposed Lehmans Road LLR D2 zone proposed by this submission seeks large lot urban densities, it is anticipated that Council may favour the certification process if it accepts the proposed rezoning. This is opposed – rezoning to LLRZ D2 is sought.
144. Potential difficulties with the proposed certification process are identified and discussed in the Section 32 Assessment. (**Appendix 3)**. In summary, the process is hugely discretionary, does not provide conventional rights to an applicant (eg right of objection/appeal) meaning decisions cannot be challenged, and it is not apparent that the process will be appropriately documented with a transparent record of the decision-making within the certification process. Further uncertainty arises in the practicalities of how to negotiate and manage the staging, funding and building of key infrastructure across a range of Sites, and a risk that land supply is controlled by a limited number of large developers. It is a far less efficient and effective method for delivering land for housing than the Council rezoning the land in the PWDP.
145. The proposed rezoning is considered to be the most appropriate, efficient and effective means of achieving the purpose of the RMA.

CONSULTATION

146. The landowners and their consultants have submitted on the WRRS and the WDDS (**Appendix 4)**.
147. The submissions to re-zone as rural residential or identify the Site as suitable for LLRZ have been rejected as noted above. LLRZ but at higher densities as now proposed is considered to be a more efficient use of the land and better meets market demand. 5000m^2 sites provide more land is needed for a spacious home and garden.
148. The landowners have been consistent in their wish to find a zone and possible land uses better suited to their needs.

CONCLUSION

173 The submission seeks to rezone 58 ha of land adjoining Rangiora from Lifestyle Rural Zone (LRZ) to Large Lot Residential with a specific density standard (LLRZ D1), minimum average lot size 1500m^2.
149. The Site has a long history of rural lifestyle use. It is not significantly restricted by potential natural hazards especially flooding, nor does it have physical limitations for development for residential purposes as it is not liquefaction prone, and has no known geotechnical limitations but does contain an area of LUC 2 soils. It is near a site of significance to iwi (SASM – 025) being the Rakahuri/Ashley River The Site has access to a collector road and is near to a strategic road giving direct access to the town centre and a range of community amenities and facilities.
150. The Site immediately adjoins the urban area of Rangiora, and is well located to join in to Council utility services. It is well suited for conversion to residential use.
151. The Site is not identified within the westward growth direction for Rangiora in the District Development Strategy 2018 nor is

it part of the DEV-WR development area which adopts Lehmans Road as its western boundary. It is in a location that achieves coherent and compact urban form offering ease of access to business services, community facilities, reserves and the primary road network.
152. The proposed rezoning provides for a connected and high amenity residential living environment not presently available under the PWDP while avoiding and/or mitigating any potential adverse effects on the environment. It will provide for continuing high demand for a variety of high quality residential sections aimed at a particular segment of the housing market in an ideal location, easily accessible to the existing town centre services and facilities. It will broaden the range of housing available. As such, it is consistent with the NPS-UD including Objective 6c) and Policy 8, to be responsive to proposals which supply significant development capacity and contribute to a well functioning urban environment.
153. The use of this Site for residential purposes can be a sustainable and efficient use of land and infrastructure. The proposed rezoning better provides for the social, economic, environmental well-being of the landowners and the Rangiora community than continuation of the current low intensity lifestyle land use on 4ha blocks, or a conventional LLRZ residential use.
154. Any potential adverse effects of the implementation of the proposed rezoning can be assessed at subdivision stage but there has been no restriction on servicing the blocks to date. Capacity will need to be confirmed for infrastructure, power and road network. Any future subdivision of the Site will need to confirm water supply and wastewater treatment and disposal options.
155. Rezoning of the site to LLRZ zone is not inconsistent with the policies and objectives of the PWDP, but it is at odds with the dated CRPS approach to provision of urban growth and housing capacity for Greater Christchurch, to the extent that it is not within an FDA created by Change 1 to the CRPS and is not identified as an LLRZ site under the strategic RRS prepared by the Council.
156. As the proposal helps achieve the purpose of the RMA, and has been shown to be consistent with the relevant provisions of the NPS-UD, the submission can be accepted by Waimakariri District Council.

Original Submission

Summary Reasons for the Submission

The reasons for our submission are outlined below.
a) The preferred relief (**the proposed rezoning**) is both appropriate and necessary to achieve sustainable growth and development of Rangiora and the District and meet the requirements of the National Policy Statement for Urban Development 2020 (**NPS-UD**).
b) The Site identified in Figure 1 and at para 1 of the Preferred Relief above is a logical and preferred location that lends itself to a specific type of housing development not provided within the PWDP as a residential option adjoining but outside the existing urban areas. Nowhere is it possible to develop in a comprehensive, coordinated way a low density, high quality residential environment in the District's towns, the Rural Lifestyle Zone or Settlement Zone as a permitted activity.
c) The requirement for 12/15 hh/ha in GRZ zones (the majority of land in urban areas) drives development to modern scale relatively small urban lots best produced as a package across a significant land holding. The GRZ subdivision standards do not provide for the needs of people who seek a generous sized urban lot residential setting. This is a housing sector that is running against the planning tide of intensification but is, nonetheless, a legitimate form of housing in an appropriate setting. The barriers to such development in urban areas requires an appropriate setting/ location in the rural areas but close to or adjoining the urban areas and at a much lower density than is desired or appropriate (the PWDP LLRZ) to meet the housing needs for generous sized urban lot residential living..
d) The PWDP subdivision standards for LLRZ require lots that are very large for those whose primary interest in a rural setting is a form of residential living, not one that requires significant maintenance and management often involving animals or machinery at scale. Conversely, the GRZ subdivision standards do not provide for the needs of people who seek a large lot residential setting
e) The focus in the PWDP is on prescribing a limited range of residential options and tightly controlling and constraining housing choice within those options. Further urban growth is also tightly constrained and controlled around DEV areas around Rangiora and Kaiapoi but for a very specific form of residential development driven off density requirements that do not match the needs of all landowners.
f) The focus in most new District Plans, driven in part by the National Planning standards, is to simplify the range of zones, to standardize lot sizes, to supposedly create efficiency and certainty through ease of administration of the District Plans. This is done by constraining housing and land development choices by lot size, by location, by built standards and the disposition of built/open elements in a site. However, the National Planning standards do provide for large lot urban residential living, a residential living option which has not been taken up the PWDP (due most likely to the restrictive provisions of the CRPS which only prescribe one from of lower density residential living, at a density of 1-2 hh/ha).
g) This planning approach may be a standard approach to resource allocation but it does not provide a flexible, responsive

approach to innovative and new development options. The Government is creating policy settings that on one hand seek intensification in urban areas, while at the same time pushing away from a land allocation model of planning. The PWDP in striving to face both policy directions has a package of measures that are in fact a major barrier in terms or cost, timeframes and certainties for proposals that are not cut from the suite of housing and development options set out by the PWDP. The allocation of land in preferred development areas, it must be said, runs counter to the Government's push, and now its direction, to free up land for development, to encourage innovation in housing (presently with a focus of intensification) and to make available a range of responses to the need to meet the housing needs of people and communities set out in the NPS-UD.

h) While the weight of demand (and the planning response) is around affordable housing, around small lots and dense development that supports investment in public facilities and amenities such as public and active transport, reserves, and commercial services, there is always a wide spectrum of preferences at play in the housing market. The demand for high quality, generous houses set on generous sized parcels of land within high amenity settings is an important and no less relevant housing sector. There is a strong unmet demand, as confirmed by advice from Bayleys real estate (**Appendix 5**) for larger family homes with room for a pool or similar. Purchasers want to be close the amenities of Rangiora and within walking and cycling distance of local schools. They do not want the only available options – a 4 ha lifestyle block or 5000m^2 rural residential site at Mandeville or Ohoka.

i) Interestingly enough for a nation built on the so-called quarter acre paradise, recent policy and planning interest in housing and land development has now seemingly positioned the 1011m^2 section as a luxury item, as the antithesis of providing for community well-being and needs. It is as though the old quarter acre of itself acts against building a sense of community despite being able to be developed in a planned, structured, coordinated or integrated manner. Rather than being a frivolous discretionary item in land development
and housing choice, a well-planned, well located and properly serviced low density residential environment has much to offer urban environments. They can be tactically used to provide shape and edge to urban areas, they can provide a mass of amenity different from (and potentially complementary to), but no less legitimate in urban outcome terms, to conventional GRZ zoned land.

j) In many ways the approach of a district plan to the role and place of the old quarter acre is not dissimilar to the issues faced by comprehensive retirement villages when first proposed. The idea of dense, almost gated and self-contained communities, with multi storey buildings also did not sit well in many district plans. But now they are accepted as an important part of the urban fabric catering to a specific demographic and health demographic. Most plans enable them.

k) Provision for low density residential in an urban setting, or failing that likelihood, in an adjoining rural zone is a fundamental gap in the district plan.

l) The submission seeks to provide for another housing typology not provided in the PWDP and in a location with significant planning merit. The planning case was made out in a detailed submission to the proposed Rural Residential Strategy (**RRS**) for the land identified in this submission to be "reserved" for conventional Rural Residential zoning in the review of the District Plan. That submission was rejected in favour of a decision ascribing an unspecific strategic significance to Lehmans Road as the urban boundary; simply the decision was that rural residential development here would preclude this area as a future urban growth path, even though this was likely to be very long term as the Waimakariri District Development Strategy (WDDS 2018) for the period up to 2048, does not favour urban growth west of Lehmans Road.

Officer Recommendation

Continue to exclude the area west of Lehmans Road and the racecourse land at Rangiora as growth areas as these were originally considered but not included in the draft RRDS as they trigger the key preliminary criteria of: being on the direct edges of a main town outside of the Projected Infrastructure Boundary (PIB) thereby foreclosing more intensive long-term urban development, and…

Panel Recommendation

The panel accepted the officer recommendations to exclude areas on the fringes of Rangiora in the final RRDS due to these having the potential to foreclose more intensive long-term urban development of the town.

m) In light of the above decision on the Waimakariri Rural Residential Strategy, the proposal now is for a form of high amenity low density urban zoning, which whilst in demand is entirely absent from the PWDP. This will be a long term urban form of development. The proposal set out in the submission will achieve a compact, and efficient, urban form on the edge of Rangiora with excellent connectivity by multiple transport modes. It provides for continuous urban development by enabling a built form which can act as a strong zone or urban boundary.

n) The proposed rezoning will accommodate approximately 311 LLRZ lots1 at the proposed amended density standards for LLRZ D2 (average size 1500m^2). It will contribute to a well-functioning urban environment, meeting the NPS-UD Objective 6(c).

o) Any adverse effects on the environment arising from the proposed rezoning will be minimal, if any, and can be adequately mitigated. A high amenity master planned development is proposed.

p) Significant positive effects arise from the proposed rezoning. It will enable the short term housing demand at Rangiora to be met, and can deliver a housing typology for which there is demand, on lots that are not a burden to the landowners (which is the case for 4ha and the very limited areas of LLRZ D1 with a density of 1-2 hh/ha) and for which there is no provision in the PWDP. At present rates of land uptake there is about 4 years vacant land supply in Rangiora. Given it takes 3-5 years to bring land from zoned state to on the market as developed lots, there is some urgency in providing additional capacity. This proposal helps address an anticipated shortfall in residential zoned plan enabled land.
q) There is no additional cost to the Council in re-zoning the Site as there is expected to be capacity in the public utilities and the existing road network, including planned upgrades.
r) Amendments to PWDP objectives and policies may be necessary to provide for a higher density LLRZ, but of themselves will not act against those relating to Strategic Directions Urban Form and Development and Urban Growth. The PWDP approach to zones and
identification of future development land is already out of step with higher order Resource Management Act 1991 (RMA) statutory documents because they do not give effect to the NPS-UD (and are sought to be amended through this submission).
s) The alternatives of retaining Rural Lifestyle or Large Lot Residential zone across the entire Site are not an efficient use of land which immediately adjoins the urban area of Rangiora, and is highly accessible to the town centre by active transport modes as well as car.
t) The proposed rezoning is consistent with and the most appropriate, efficient and effective means of achieving the purpose of the RMA.

The Site
1. The Site is a 58ha block of land ('the Site') accessed from Lehman Road, Rangiora **(Figure 1)**. It is owned by the two submitters and 12 other landowners.

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1 Assumes 20% of land area taken for servicing including roading, reserves and stormwater management if required.

Figure 1: The site (outlined in blue (Google Earth)

2. The Site is surrounded by RLZ land that is used for a mix of lifestyle and conventional farming. To the NE is the Rangiora Eco Holiday Park, and beyond the Park is the Rangiora Racecourse about 300m away from the nearest lot and 1km from the centre of the Site. Land to the south east is GRZ and part of urban Rangiora with newly developing residential land west of West Belt. About 1.9 km to the NW is Rangiora Airfield. About 1km north of the most northern lot is the Ashley River.
3. The southern-most lot in the proposal with the Rangiora Vet Clinic faces, but does not have access to Rangiora-Oxford Road (State Highway 72). This arterial road provides the main road connection in to the centre of the town. The well-established Fernside Rural residential area is about 2.5km west from the junction of Lehmans and Rangiora-Oxford Roads.

Figure 2: the site is a broader context (Site marked red)

4. The Site is not identified as lying within a preferred growth direction for Rangiora in the Waimakariri 2048 District Development Strategy (2018) (**WDDS**) **(Figure 3)**. No land west of Lehmans Road is included in the West Rangiora Development Area (**DEV-WR**) in the PWDP.

Figure 3: Figure 11 WDDS

5. The Council reviewed its strategic approach to the location and provision of Rural Residential land (now zoned LLRZ in the PWDP) in the WDSS. It adopted the position that it would:

a) Explore tools such as cluster development to manage rural character

b) For rural residential development, adopt an approach that has a primary focus on creating new rural residential areas, with a secondary focus on enabling large lot intensification within existing rural residential areas where there is sufficient community support and servicing available

c) Review the Rural Residential Development Plan for the whole District (pg 21 WDDS).

6. Rangiora presently has a population of 17,841 (2018 Census). It grew steadily between 2006 and 2018. Growth of Rangiora since then has continued in step with the district growth which has increased 8.2% between 2018 and 2021 from 61,300 to 66,300 at an annual average of 2.8% from 2018 to 2020 (Statistics NZ Subnational population projections at 30 June 2021: provisional).

2006 (count)	2013 (count)	2018 (count)
12,165	15,069	17,841

Statistics NZ

Population projections at 30 June

PLANNING STATUS OF THE SITE

Chapter 6 of the Canterbury Regional Policy Statement

7. An assessment of the CRPS is set out in **Appendix 1** to this submission.
8. The Site is within the Greater Christchurch area.
9. It was not shown as a Greenfield Priority Area – Residential (GPA) on Map A of the Canterbury Regional Policy Statement (CRPS). The GPA terminates at Lehmans Road.
10. As a result of the Minister for the Environment's decision of 28 May 2021 on Change 1 to Chapter 6, an area largely south of Oxford Road and a finger of land to the north of Oxford Road was included as a Future Development Area (**FDA**) (**Figure 4** orange).

Figure 4: Map A Chapter 6 Regional Policy Statement Greenfield Priority areas
Site location identified with red circle (appx)

11. The FDAs are intended to accommodate the increased demand for new dwellings in that part of Waimakariri District within the Greater Christchurch Urban Area and to respond to the NPS-UD. They do not provide "plan enabled" land as they need to negotiate a rezoning process to confirm their status as land developable for housing and other urban purposes.
12. The proposal for a LLRZ zone with average lot sizes of 1500m2 is inconsistent with the policy approach of Chapter 6 for Greater Christchurch, in that if fits none of the residential living typologies provided for in Chapter 6 and is not in a location identified for urban or rural residential development. It sits 'between' the urban and rural residential densities provided for in the CRPS (minimum 10 hh/ha for urban in Waimakariri, and average 1-2 hh/ha for rural residential). The proposed density is appx. 6.66 hh/ha.
13. Notwithstanding, the proposal meets all the location and other criteria in CRPS Policy 6.3.9 for rural residential development. It is:

- Outside the CIAL noise contours
- Has some sites with restrictions from the take-off and landing vectors for Rangiora Airfield but not such as to impact its operational capacity.
- Is outside the groundwater protection zone
- Is not within the Waimakariri stop bank system
- Has no views of or to the Port Hills
- Has good access for emergency services
- Will not create reverse sensitivity issues with adjoining land uses; Rangiora Racecourse is 500m away.
- Free of significant natural hazards and is a flat site.
- Supports no significant natural values or ecological values.

• Contains no SASMs.
• Can be integrated into or consolidated with the existing urban area of west Rangiora.
• Contains no surface water bodies so there will be no adverse impacts on these.
• The development will be contingent on an ODP to provide integrated design for subdivision and land use, and provide for the long-term maintenance of a high quality high density rural residential character.
• The proposal is not intended as a staged development towards full urban; rather it is intended to provide a unique residential environment that can stand alone and contribute to the urban fabric of Rangiora like Palmview in east Rangiora, or as Kaiapoi Lakes does for Kaiapoi.

14. Overall, the proposal is not consistent with Chapter 6 but that is more a function of its original purpose when formulated in 2013. Notwithstanding that, the submission for a lower density residential focussed, high quality urban environment that attaches to an existing urban area and that promotes a coordinated pattern of development has planning merit.

Operative Waimakariri District Plan

15. The Site is zoned Rural in the Operative Plan. The minimum lot size for subdivision and a dwelling is 4 ha.

Proposed Waimakariri District Plan

16. The Site is zoned Rural Lifestyle Zone **(LRZ) (Figure 4).** The minimum lot size for subdivision and a dwelling in the LRZ is 4 ha.
17. Oxford Road is a strategic road and Lehmans Road is a collector road.

Figure 5: Proposed District Plan Zoning (site outlined in red)

18. The Site is also subject to, or potentially influenced by, a number of Overlays:
a) Rangiora Airfield Take Off Climb and Approach Obstacle Limitation Surface (**Figure 6**)
b) National Grid Transmission Lines (**Figure 6**)
c) Liquefaction: Liquefaction damage is unlikely (**Figure 6**)
d) Non-Urban Flood Assessment Area (**Figure 7**)
e) Geographic areas: Ecological Area – Plains
f) Ecological District – Low Plains

Figure 6: Rangiora Airfield Take-off and Approach vectors (blue dashed lines); Liquefaction damage unlikely (green)Transmission lines (green lines); Site outlined in red

Figure 7: Non-urban flood assessment & Waimakariri Flood Hazard maps
Blue – medium risk, green – low risk, white – very low

DEVELOPMENT PROPOSAL AND PROPOSED REZONING

19. Subdivision of the Site will create approximately 311 LLRZ D2 lots.
20. The key design drivers for the proposal are:
a) A high amenity premier residential zone with large houses on large sites – average 1500m^2, min 1000m$_2$ based on the St Kilda, Hamilton development concept (**Figure 8**).
b) LLRZ D2 standards would enable a lower density zone in the medium term e.g. 10 years to achieve a high quality consistent character subdivision. If developed as an integrated development subject to an ODP subdivision can be staged for to the proposal.
c) Creating strong connections with the immediate neighbourhood by providing a cohesive interconnected roading layout that picks up direct links to the eastern neighbourhood off Lehmans Road and the northern subdivision roading, and carries them into the Site.
d) Creating a high amenity and diverse residential neighbourhood by providing interfaces to roads, reserves and rural environments.
e) Respecting and building on local identity and character of Rangiora by retaining specific vegetation features from the Site, and anchoring the development into the wider landscape.

21. A development concept can provide for sound urban design by:
a) A hierarchy of movement corridors.
b) Prioritisation of walking and cycling.
c) A north-south alignment of street blocks to maximize solar access and provide for efficient use of lots.

d) Block perimeters being kept as small as practicable to aid permeability and higher public amenity.
e) Enabling a range of housing typologies set in high quality landscape and street setting with generous amenity plantings and curtilage.

Figure 8: St Kilda development images (Bayleys)

22. St Kilda, Cambridge is a premier development on the outskirts of Cambridge, centrally located and with easy access to the Waikato Expressway. It was originally part of a small dairy operation which was dissected by the Waikato Expressway, leaving a portion within the Cambridge Town boundary and the larger balance of the property of approximately 80 ha (which became St Kilda) on the Eastern side of the Expressway, left in the Rural Zone.
23. The initial development concepts were for a Rural Residential type development given the Expressway separation of the existing residential development on the Western side of the Cambridge Bypass, however this was not supported by Council and a new concept of larger residential sections of a 1600m² average size was developed and approved – see https://www.stkilda.nz/page/location/

EFFECTS ON THE ENVIRONMENT

Township growth and urban form

24. The Site immediately adjoins the western edge of urban Rangiora.
25. The WDDS indicated a general preference for the direction of urban growth of Rangiora to the east as a way of balancing up the residential areas around the town centre and some growth to the west.
26. The approach of the WDDS was to signal growth options to be confirmed in the District Plan Review:
The broad directions for greenfield residential growth for the District's main towns are set out in Figures 11 to 14. Further work will be carried out to identify and confirm the exact locations and extent of these residential growth areas, together with the intensification opportunities within existing urban areas. These will be enabled through the District Plan Review and other planning tools.
27. The Strategic Planning documents clearly signal active consideration of growth needs and growth directions. The options available to the Council were constrained by the approach of the CRPS as the District Plan has to give effect to the CRPS and cannot be
inconsistent with it. The CRPS took effect in 2013 and is overdue for review.
28. The CRPS tightly holds urban growth to the constraints of Map A Chapter 6 and the identified FDAs which although amended by Plan Change 1 in 2020 does not respond to the directions of the NPS-UD. In any event the approach is focused on the need for housing in full urban residential land, less on other residential development forms.
29. As such the Site falls outside the planning policy framework for urban growth. However, in terms of urban form and on the ground, there is considerable merit and logic to conversion of this existing LRZ land to a new high amenity residential form that can be integrated into the Rangiora urban fabric.
30. The proposal has the potential to anticipate the longer term growth path confirmed by the decisions on the RRS to protect the future growth option of more intensive urban development in this direction. It can set a pathway to further westward expansion on land
that holds few if any physical barriers to land development.
31. The proposal will contribute to the housing needs of Rangiora and in a form and location that does not undermine the long run urban form of Rangiora. Planned growth confirmed in the PWDP is already intended to extend westwards out to Lehmans Road and to keep the town edge squared up providing depth to future development and providing a rational basis for providing movement networks driven off the key roads such as Rangiora-Oxford Roads. The West Rangiora Future Development Area confirms this approach. The Site sits in the next block west of Lehmans Road so is not proposing a disjointed urban form, nor one that is not part of the long term thinking of urban form and growth for Rangiora.

32. A full residential zoning is proposed under LLRZ D2 and will provide a high quality street character, overall amenity and passive surveillance over the street, and will create the correct lighting standards, roading standard, fully formed footpaths and cycleways required for a high quality urban environment.

Neighbourhood and wider community effects

33. The Site is serviced by a collector road and is close to an arterial road. This provides for ease of access and safe and convenient movement to and from the Site. A planned development co-ordinated by an ODP can facilitate within the site

movement corridors and linkages through the Site to provide for walking and cycling.
34. A key positive neighbourhood and community effect will arise from the existing dwellings and their established gardens and plantings that will anchor new development and provide a point of reference for new dwellings. Development will not be on a bare site; it will take place in an existing established part-residential setting. The transition to a low density, high quality premier residential development will start from a favourable position and minimise the apparent extent and nature of the landscape change.
35. The Site is comparatively large (58.4 ha) and has the potential to support a variety of residential building typologies and this will contribute to a mix of households within the development and provide built form variety and interest in the streetscape. Whilst LLR D2 standards are proposed, it may be that part of the Site is suitable for other higher density forms of development, which would be within scope of the alternative relief, and could be considered as part of the master planning process required for preparation of an ODP (ahead of the hearing). The earlier stages of the St Kilda development were for large lot residential, with more clusters of townhouses included as later stages (and a retirement village). A retirement village is unlikely in this case, given the proximity of the Charles Upham Retirement Village.
36. Rangiora is well-positioned to accommodate and service the needs of a fast-growing resident population that will in turn support more business activity, schools, community facilities and community organisations.

Effects on tangata whenua values
37. The Proposed District Plan does not identify any Sites and Areas of Significance to Maori in the Site, but the nearby Rakahuri/Ashely River identified as SASM-025. This has been scheduled as being
River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species
38. The PWDP has Policy SASM-P8 which is relevant to pre-development processes:
Engagement with rūnanga
Te Ngāi Tūāhuriri Rūnanga and the District Council to encourage engagement with the Rūnanga priorto persons undertaking activities and/or applying for resource consent where the activity has thepotential to adversely affect identified sites or areas of Ngāi Tūāhuriri cultural significance. Where priorengagement with Te Ngāi Tūāhuriri Rūnanga h as not been undertaken by an applicant for an activitythat has the potential to adversely affect an identified site, the District Council will consult with the Rūnanga.
39. The Site is not listed as an archaeological site on the NZ Archaeological Site database.

Landscape and visual effects
40. Rural Lifestyle style development exists on the Site now (a series of 4 ha lots with a dwelling and associated accessory buildings on each). The landscape is dominated by shelter belts, utility buildings, significant trees and planted curtilages around dwellings many of which are well set back off the roads down RoWs.
41. An ODP will help to achieve an integrated, cohesive and coherent development The proposal will lead to a modification of the landscape of the Site from a predominantly lifestyle block landscape to a denser semi-urban environment dominated by residential building that will, in time, get the benefit of street tree and reserve plantings and landscape treatments around the houses.
42. The visual effects which will arise from a change in the number of vegetative and built elements in the landscape are significant, but not avoidable, if the Site is to contribute to the on-going growth of Rangiora. The change will contribute to a high quality amenity and quality of environment and one that will be entirely consistent with and supportive of the rural lifestyle residential development that has successfully established on the Site.

Well-functioning urban environments
43. The Site adjoins the existing built up urban area of Rangiora. Immediately to the east are existing or developing residential areas.
44. The conversion of the Site from present rural lifestyle uses to low density, high quality residential will continue a pattern of outward expansion of Rangiora. Such a change may not be consistent with the PWDP's identification of a Future Development Overlay for west Rangiora only as far west as Lehmans Road, but on the ground it will look and integrate as part of the urban fabric.
45. It will provide some replacement lower density living areas for the existing LLR zones at north west Rangiora – but at much more appropriate higher density that the LLR D1 standard which is 1-2 hh/ha. There are two such areas, shown on the planning maps below. River Road has an 'urban overlay' and is intended to be intensified to urban densities. The land on the opposite (east) side of Lehmans Road is a 'legacy' rural residential zoning which applies under the Operative District Plan. The landowners have developed the adjoining residential subdivision and wish to develop the land for full urban residential development. Services are in place to support this. The constraint to date has been Map A of the CRPS which does not include the land as a Greenfield Priority Area or Future Development Area, GR zoning of this land is consistent with the NPS-UD.

Figure 9: PWDP as notified – LLRZs shown in light grey. Diagonal stripes – urban growth overlay.
Site outlined in red.

46. Rangiora is growing apace. It is attracting significant interest from new home buyers as people respond to the significant investment in upgraded transport links (Northern Corridor and public transport) and a growing economic base for employment within the District and the City.

47. Rangiora has excellent connectivity to the City, both via the new Northern Corridor, and a nascent cycleway link into the City. There is a very regular bus service every half hour.(the No 1 Blue Line) The standard trip takes 70 minutes, and there is a twice daily weekday morning express service from Rangiora, and seven times weekday express out to Rangiora all via Kaiapoi.

48. The Site will step out the western edge of Rangiora, but as it exists in a peri-urban form now, such a change does not alter how the Site interacts with Rangiora as a whole. It is in many ways a functional part of urban Rangiora now; it's only the Zone boundaries and policy framework that create the sense of it not being part of Rangiora.

49. The Site is convenient to the Rakihura/ Ashley recreation trails, the racecourse, Arlington Park, and the airfield. The town centre is easily accessible.

50. The following assessment of the criteria in the NPS-UD for determining a well-functioning urban environment shows that the proposed rezoning will deliver urban, housing and residential outcomes that meet those criteria. There will be a variety of homes enabled by generous lot sizes. The Site is well-positioned, building as it does on an existing township well-serviced by public transport and cycling options, to provide good accessibility to jobs, community services, and open spaces, as well as mitigating climate change impacts and future natural hazards by being not near the coast and well removed from major rivers.

NPS-UD Policy 1

Planning decisions contribute to well functioning urban environments, which are urban environments that, as a minimum:	**Assessment**
(a) have or enable a variety of homes that: (i) meet the needs, in terms of type, price, and location, of different households; and (ii) enable Māori to express their cultural traditions and norms;	The proposal is to have larger lots supporting predominantly standalone dwellings and associated accessory buildings (including generous sized garaging) in an open landscaped garden setting. This will fill a gap in the range of housing typologies available at Rangiora and contribute to a better functioning urban environment overall at Rangiora. It is not necessary for each individual rezoning proposal to have a wide range of housing typologies, and in some circumstances this may not be appropriate. The rezoning will deliver a premier high amenity urban subdivision with generous sized lots which will complement existing and planned higher density residential development at west Rangiora. There is scope with the relief sought for a mix of residential densities. The appropriateness of this can be considered at the master planning/ODP stage. The Site has the potential to create a unique urban environment in Rangiora. It can follow the example of Palmview based on a lake or Kaiapoi Likes providing a niche housing option in Rangiora and the District meeting a need for residential land not constrained to GRZ standards.
(b) N/A business sectors	
(c) have good accessibility for all people between housing, jobs, community services,	The Site has access to a collector road and a strategic road providing easy access to key community amenities and facilities. The town is served by a public bus route to the city, and a cycle trail connecting to Kaiapoi and the City. The new West Rangiora Development Area adjoins the Site to the south. The Site will become closer to Rangiora public transport routes as they extend out to service this new growth area over time.

natural spaces, and open spaces, including by way of public or active transport; and	The Site is in walking distance to Arlington Park and the Rakahuri/Ashley which contains abundant recreations pace. It is easily accessible to the town centre and within walking distance to the Huntingdon Drive local centre.
(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and	The demand for housing and land in Rangiora is largely ahead of the planning means to respond. This proposal will "top up" the land presently set aside in the PWDP and provide a useful buffer to demand. The Site owners have been keen to release this land for more intense development for some time; there is no prospect of land banking.
(e) support reductions in greenhouse gas emissions; and	The Site has significant advantages in being easily accessible to the town centre and reserves, community facilities and schools. The proposal retains a consolidated form to Rangiora with good connectivity and linkages to recreation space and commercial centres reducing the need for car travel.
(f) are resilient to the likely current and future effects of climate change	The Site is within the area of influence of a major river but the non-urban flood assessment maps do not show extensive flooding likely at the Site. Being inland it is not at risk from climate change induced extreme natural hazard events like sea level rise. or river flooding.

Effects on ecosystems and habitats

51. The Site is currently used for a mix of low intensity (grazing) farming, and lifestyle purposes. Shelter belts and utility buildings have been established
52. The Site has been identified in the PWDP with two ecological overlays (the PWDP ecological overlay – Plains and Low Plains Ecological District). They are a district-wide overlays and no specific ecological values have been identified in the Proposed Waimakariri District Plan. These overlays seek primarily to retain indigenous vegetation. The PWDP identifies SASM 025 nearby the Site. That is a Site and Area of Significance to Maori and in SASM - Schedule 1 is identified as *being River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species.*

Effects on natural and physical resources

53. The Site drains in a SE direction towards the newly developing residential area.
54. There will be a degree of site disturbance as part of creating the roading network, and reserves, and as part of curtilage development on each lot.
55. The proposed use for residential activity inevitably leads to loss of some rural productive potential as land owner intentions are not about farming or productive use of the land, but lifestyle use and enjoyment. Built forms and hard surfaces become more dominant.
56. The Site comprises 4ha bocks now and these are not able to be used effectively for productive purposes other than for intensive productions based on tunnel housing and other supported production systems. None exist in the Site now.
57. The Site contains Class 2 and Class 3 soils as defined in the NZ Land Use Inventory (Landcare Research) Land Use Capability classes 1-3 **(Figure 10)**. Productive use of these soils other than for low level purposes i.e. grazing, is not feasible given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production).

Figure 10: Site soils: Site outlined in red; (Canterbury Maps)
Class 2 soils: bright green/Class 3 soils: light green;

Discharges of contaminants into the environment
58. There will be no discharges of contaminants into the environment. Wastewater will discharge to the Council's reticulated system.
59. Stormwater discharges will potentially be to ground given ground conditions or to an approved and consented stormwater management and treatment area which will meet all relevant Council standards.

Risks from natural hazards or hazardous installations
60. The PWDP planning maps show the Site as being within a Non-Urban Flood Assessment Area.
61. The District Plan maps do not identify high flood hazard areas or high coastal flood hazard areas, rather these are identified through the flood assessment certification process. This enables the most up-to-date technical information to be used. However, as a guide, areas that are potentially high hazard can be identified through the Waimakariri District Natural Hazards Interactive Viewer (NH - Introduction).
62. Rules that refer to a Flood Assessment Certificate require a certificate to be obtained from the District Council to determine compliance with the relevant rule. The alternative is to apply for resource consent as set out in the rule.

63. Rule NH-R2 states
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;

64. Assessment of flood risk and consequence can be undertaken at subdivision stage.
65. There will be no hazardous installations proposed on the Site.

Geotechnical assessment
66. The PWDP planning maps show the Site as being "Liquefaction damage is unlikely. Standard investigation procedure outlined in NZS3604 is appropriate".

Contaminated land
67. A Preliminary Site Investigation can be carried out for the Site at subdivision stage.
68. An enquiry of ECAN has identified that two sites at the northern end of the Site potentially contain some contaminated land, which can be investigated further at subdivision stage **(Appendix 6)**. 315 Lehmans Road is an unverified HAIL site (previous use for clay target shooting) and 317 is registered as containing uninvestigated persistent pesticide bulk storage.

Servicing
69. Proposals for servicing the Site and the effects from such servicing in relation to domestic water supply, wastewater, stormwater, roading, and telecommunications will be required for any subdivision consent.

Economic effects
70. It is anticipated that urban development will generate positive economic effects, both from the investigation/development phase and for the longer run economic activity from householders participating in the local economy.

Climate Change effects
71. An assessment of the effects of the proposed rezoning on climate change is included as part of the assessment of a well-functioning urban environment above.
72. A well-functioning urban area that is designed and serviced in an integrated manner, applying sound urban design principles, will enable a reduction in greenhouse gas emissions compared to unplanned, ad hoc development that does not create compact urban forms located where the services and benefits of existing, established urban areas are not readily accessible.
73. There is a triangle of planning influence that can be brought to bear on reducing greenhouse gas emissions
a) Compact urban form minimising distances between homes and work/play options.
b) Proximity of homes to community facilities, services and amenities and business/work areas.
c) Design and provision of movement corridors and linkages that create opportunities other than for vehicles for getting

around.
74. The Site of the proposed rezoning:
a) Helps in retaining a compact urban form to Rangiora.
b) Is easily accessible to the town centre and is located convenient to the recreation resources of the nearby Rakahuri/Ashley River, the airfield and racecourse and Arlington Park.
75. Rangiora has excellent connectivity to the City, both via the Northern Motorway, the new Northern Corridor, a cycle way link to Kaiapoi which is linked to the new north city cycle way along the Northern Corridor and a very regular bus service.

Positive effects
76. The proposed rezoning will provide for the continued growth of Rangiora by managing the development through an ODP. The proposal will provide a buffer to on-going high level demand for lots in Rangiora. It will cater for a specific housing need not found in GRZ Zoned land nor LLRZ land. The proposed rezoning is anticipating a form of development that is a much more efficient use of a qualifying site supporting a well-functioning urban area. It is a positive endorsement of Rangiora as a growth node in the District.
77. The benefits derived from a planned ODP approach include facilitating high levels of connectivity, creating community links to identified focal points. The Site is close to recreation facilities. A coordinated and integrated development will provide a distinctive environmental quality and point of difference to the development.
78. The Site adjoins existing and developing residential development on the western edge of Rangiora.
79. From a community well-being perspective, the provision of additional land for residential growth will continue to support the Council's investment in community infrastructure by maintaining and facilitating growth rates, increasing the rating base and attracting development contributions.

STATUTORY PLANNING ASSESSMENT
80. Submissions must be assessed under the provisions of the RMA, including Part 2 and Section 32 (Requirements for Preparing Evaluation Reports).

National Policy Statements
National Policy Statement on Urban Development Capacity (NPS-UD)

81. The NPS–UD applies to this proposal as it is directed at Tier 1 urban environments, and
Tier 1 local authorities which includes Waimakariri District as part of the Christchurch urban environment that is defined in Table 1 of the NPS, and additionally defined as:
any area of land (regardless of size, and irrespective of local authority or statistical boundaries)
that: is, or is intended to be, predominantly urban in character; and is, or is intended to be, part of
a housing and labour market of at least 10,000 people.
82. The NPS-UD recognises the national significance of:
a) Having well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future; and
b) Providing sufficient development capacity to meet the different needs of people and communities.
83. The NPS outcomes are to be achieved through objectives that address:
a) Planning decisions improving housing affordability by supporting competitive land and development markets.
b) Regional policy statements and district plans enabling more people to live in areas of urban environments near centres or areas with employment opportunities, area well serviced by public transport or a high demand for housing in the area.
c) Urban environments developing and changing over time in response to diverse and changing needs of people, communities and future generations.
d) Local authority decisions on urban development being integrated with infrastructure planning and are strategic over the medium term and long term.
e) Local authority decisions on urban development are responsive particularly for proposals supplying significant development capacity.
f) New Zealand's urban environments support reductions in greenhouse emissions and are resilient to current and future effects of climate change.
84. The key method to achieve these objectives is by development of a Future Development Strategy (FDS). This will set out how the Councils will provide for sufficient development capacity over the next 30 years to meet expected demand. There is no FDS for the greater Christchurch Urban Area that meets the requirements of the NPS-UD.
85. Work on development capacity completed for the NPS - UDC 2016 by the Greater Christchurch Partnership as an Update of the existing Urban Development Strategy (UDS) – Our Space 2019 confirmed what there was a shortage of feasible development capacity for future housing in Waimakariri District for the medium (next 10 years) and long term (10 to 30 years) periods. That assessment is now out of date as it does not address the requirements of the NPS-UD; and rates of take up of land have exceeded projected rates.

86. One of the key changes in the NPS-UD is that local authority decisions on urban development that affects urban environments are responsive, particularly to proposals that would supply significant additional capacity. It also amends the required methodology for housing and business capacity assessments.
87. The current CRPS does not meet the new NPS-UD requirement in relation to proposals for significant additional capacity. Regional councils are required to include criteria in the RPS to determine what plan changes will be treated for the purposes of Policy 8 as adding significantly to development capacity as soon as practicable. ECAN has yet to respond to this requirement.
88. The NPS-UD has immediate effect, so in the meantime, proposals such as this submission must be assessed in the context of the overall intent and purpose of the NPSUD as articulated in the NPS-UD objectives and policies. This includes that NZ has well-functioning environments; provides sufficient development capacity to meet the different needs of people and communities; planning decisions improve housing affordability to contributing to competitive house and land markets; and RMA plans enable more people to live near major employment areas, where there is existing or planned public transport, and where there is high demand for housing.
89. The NPS-UD is the higher order document and its requirements override those of lower order documents where there is a conflict, including regional and district RMA plans.
90. Key objectives and policies in the NPS-UD are assessed here:

NPS-UD Objective/Policy	**Assessment**
Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	The proposed development will further enable Rangiora to sustain itself as a well-functioning urban environment by consolidating the residential area close to the town centre, and provide residential development close to public transport links and existing community and commercial facilities including Huntingdon Drive local centre.
Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.	The proposal provides choices in the Rangiora housing market and in doing so supports housing affordability. Whilst the proposal is for a premier larger lot urban residential development, it is important that all sectors of the market are catered for. This will be more affordable than forcing those wanting large sections out to the much larger and very limited areas of LLR D1 development, or having to purchase 2-3 sections in a standard residential subdivision. There Site is in multiple ownership and the landowners are working together to achieve the rezoning. It will bring more competition into the market by bringing new entrants into the market.
Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply: the area is in or near a centre zone or other area with many employment opportunities the area is well-serviced by existing or planned public transport there is high demand for housing or for business land in the area, relative to other areas within the urban environment.	The CRPS is due for review in 2024 but in the meantime the existing CRPS is not in accordance with the NPS-UD 2020. The proposed rezoning is on the edge of the District's largest centre, which offers a wide range of community and business services, and employment opportunities. It is expected that a proportion of future residents will commute outside the township, but as the township and associated business areas e.g. at Southbrook, continue to grow, this is expected to become proportionally less. Rangiora is well serviced with public transport, there is scope for future mass transit PP, and there is a high demand for housing at Rangiora. The Site adjoins the new West Rangiora Development Area, to the south. Extensions of public transport to service this growth area will be readily accessible to the Site.
Objective 6: Local authority decisions on urban development that affect urban environments are: integrated with infrastructure planning and funding decisions; and strategic over the medium term and long term; and responsive,	Whilst not currently identified as a future growth area in RMA documents, the Site is well placed at the township edge to be serviced by existing infrastructure. Some upgrades may be required, which will be investigated further with Council prior to the hearing. See Policy 8 below for commentary on proposals which supply

particularly in relation to proposals that would supply significant development capacity.	significant development capacity
Objective 8: New Zealand's urban environments: support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change	The proposal adjoins the existing built up are of Rangiora, close to public transport links. Its excellent accessibility to Christchurch City, substantially enhanced with the new Northern Motorway extensions, means it is now highly accessible to these nearby major employment areas. Travel distances are relatively short, minimising vehicle miles and the potential for greenhouse gas emissions. There is a cycleway link from into Christchurch City, and regular bus services, including an express route. The Site is inland and not subject to natural hazard risks associated with sea level rise arising from climate change.
Policy 1 – Planning decisions for well-functioning urban environments	Assessed at para 41-50
Policy 2 - Sufficient development capacity Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.	The proposed rezoning is anticipated to provide sections that will be available for the short term (up to 3 years) and into the medium term (3-10 years) if adopting a more conservative outlook. The locational and amenity advantages of Rangiora also favour strong ongoing demand. The PWDP UFD-O1 Feasible Development Capacity for residential activities identifies the need for 6300 residential units in the period 2018-2028, and 7100 residential units 2028-2048. These numbers are derived from Chapter 6 CRPS Table 6.1. and are out of date. Data from the Council (November 2021) confirms that there are about 800 vacant lots in Rangiora. Building consents are at about 180/year. That means there is about 4 years vacant land supply. A lead in time of 3-5 years is needed to go from rezone to house build so the Council is facing an unnecessary squeeze on land availability. That will translate in to an upward shift in land and section prices as has been the case at Rolleston. The data suggests that the PWDP will be late to the party to ensure there is at least sufficient development capacity to meet expected demand for housing land over the short term, medium term, and long term. There is a looming, inevitable land supply issue so any proposal to add capacity will push the Council closer to meeting the requirements of the NPS-UD. The proposal is consistent with ensuring there is at least sufficient land supply for housing.
Policy 8 – Responsiveness to plan changes Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is: (a) unanticipated by RMA planning	The proposed rezoning is not anticipated by RMA documents - it is not a Greenfield Priority or Future Development Area in the CRPS, or a New Development area in the PWDP. A responsive approach to the proposal is required as it meets the Policy 8 criteria for unanticipated zoning. It will contribution to well functioning urban environments and will add significant development capacity. There is no development capacity for the housing typology proposed – so any provision is significant in this context. The development will deliver appx 311 high amenity large lot residential sites at an average density of 1500m2. This will be higher if a mix

documents; or
(b) out-of-sequence with planned land release

of densities are proposed, which may be appropriate in some parts of the Site, dependent on master planning work to follow.

91. Adopting the submission to re-zone the land, and enable the proposed development on the submission Site will satisfy the objectives and policies of the NPS-UD.

Proposed National Policy Statement for Highly Productive Land (NPS-HPL)

92. The Government proposed in 2019 a NPS-HPL to prevent the loss of productive land and promote its sustainable management. The overall purpose of the proposed NPS-HPL is to improve the way highly-productive land is managed under the Resource Management Act 1991 (RMA) to:

a) Recognise the full range of values and benefits associated with its use for primary production
b) Maintain its availability for primary production for future generations
c) Protect it from inappropriate subdivision, use, and development.

93. The NPS-HPL is still a proposal and not intended to take effect until after Gazettal. At the date of this submission the NPS-HPL has no effect and no assessment of it is required for the purposes of this submission.

94. The Proposed NPS-HPL interim definition of HPL is land defined as Land Use Capability Class 1-3 soils. A portion of the Site contains Class 2 and 3 soils (see **Figure 10)**. Highly productive use of these soils is not realistic given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production). Its present use as lifestyle blocks, low level grazing and agistment is the more likely long run use of the Site if not rezoned.

95. Objective 3 of the Proposed NPS-HPL specifically refers to highly productive soils being protected by avoiding *"uncoordinated urban expansion on highly productive land that has not been subject to a strategic planning process"*. The Site was assessed through a strategic planning process (WDDS 2018) and the RRS as a preferred site for LLRZ development, and rejected for a change in zoning on the basis that it may be required for long term urban growth of Rangiora.

96. It is therefore considered that this submission to re-zone the Site is largely in accordance with the Proposed NPS-HPL.

National Planning Standards

97. The National Planning standards prescribe various matters under the RMA so that there is consistency among planning documents most relevantly here in terms of appellations for zones, and the standards applying to these zones.

98. The proposed rezoning adopts the standard zone appellation, in this case LLRZ as contained in the PWDP.

99. The PWDP identifies plan standards for minimum and average net site areas for the respective zones. These are modified for the proposed rezoning as a higher density LLRZ.

100. The higher density LLR zoning is entirely consistent with the NPS purpose for the LLRZ as reproduced below. In this case, the principal constraint to more intensive development is the peri-urban location where a lower density transition to the rural environment is appropriate (particularly noting that the zone boundary is 'mid block' so there is no natural or physical buffer between rural and residential areas); the existing pattern of 4 ha lots with existing substantial homes and gardens; and the fact that the premier large lot subdivision proposed relies on consistency of housing quality and character to be deliver on this vision for the area.

Large lot residential zone

Areas used predominantly for residential activities and buildings such as detached houses on lots larger than those of the Low density residential and General residential zones, and where there are particular landscape characteristics, physical limitations or other constraints to more intensive development.

Low density residential zone

Areas used predominantly for residential activities and buildings consistent with a suburban scale and subdivision pattern, such as one to two storey houses with yards and landscaping, and other compatible activities.[2]

Canterbury Regional Policy Statement 2013 (CRPS)

101. Chapter 6 of the RPS *"provides a resource management framework for the recovery of Greater Christchurch, to enable and support recovery and rebuilding, including restoration and enhancement, for the area through to 2028. Recovery in Greater Christchurch is also supported by the provisions in Chapter 5 notated as 'Entire Region'. The provisions in the remainder of the RPS also apply.3"*

102. An assessment of the proposed rezoning against the relevant CRPS Objectives and Policies is set out in **Appendix 1**. This should be read in the context of the CRPS being overdue for review and that it does not provide a regional response to the NPS-

UD. The
need to focus on earthquake recovery has now passed and so many of the directive provisions need to be given appropriate 'weight' in a new national policy environment with a focus on flexible, responsive panning approaches that better provide for people's needs and well-being.

103. That assessment shows that

a) The development proposal achieves the objectives for the location, design and function of new developments (Objective 5.2.1)

b) The traffic effects of the proposal are unlikely to give rise to adverse effects and so achieves CRPS objectives for the strategic land transport network (Policy 5.3.7)

c) The Site falls outside the FDAs shown on Map A of Chapter 6 and in that regard is inconsistent with RPS Policy 6.2.1 clauses 1 to 3.

1. identifies priority areas for urban development within Greater Christchurch;

2. identifies Key Activity Centres which provide a focus for high quality, and, where appropriate, mixed-use development that incorporates the principles of good urban design;

3. avoids urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS

d) The environmental effects assessment outlined above establish that the proposed development is consistent and will not give rise to any concerns with respect to all the matters listed in RPS Policy 6.2.1 clauses 4. to 11. These matters are:

6.2.1 Recovery framework

Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that:

1. As above;

2. As above;

3. As above;

4. protects outstanding natural features and landscapes including those within the Port Hills from inappropriate subdivision, use and development;

5. protects and enhances indigenous biodiversity and public space;

6. maintains or improves the quantity and quality of water in groundwater aquifers and surface waterbodies, and quality of ambient air;

7. maintains the character and amenity of rural areas and settlements;

8. protects people from unacceptable risk from natural hazards and the effects of sea-level rise;

9. integrates strategic and other infrastructure and services with land use development;

10. achieves development that does not adversely affect the efficient operation, use, development, appropriate upgrade, and future planning of strategic infrastructure and freight hubs;

11. optimises use of existing infrastructure; and

12. N/A

e) The proposed rezoning achieves policies relating to:

- Sustainability;
- Integration of transport infrastructure and land use;
- Urban design; and
- Biodiversity, natural hazards, landscape, soils, contaminated land.

104. In terms of the CRPS polices for rural residential developments (Policy 6.3.9) the proposal sits square with all policy matters other than being a location identified in an adopted Rural Residential Strategy; and being at a higher density than provided for under this policy (ie greater than 1-2 hh/ha). As such it has a majority of features entirely consistent with the policy.

105. The CRPS includes housing capacity targets as below

6.2.1a Targets for sufficient, feasible development capacity for housing [inserted in accordance with sections 55(2) and 55(A) of the Resource Management Act 1991, from the National Policy Statement on Urban Development Capacity 2016]

For the period 2018-2048, sufficient, feasible development capacity for housing is enabled in Greater Christchurch in accordance with Table 6.1.

Table 6.1 Targets for housing development capacity in Greater Christchurch, 2018-2048

106. These derive from Our Space, under the requirements of the then NPS-Urban Development Capacity 2016, since replaced by the NPS-UD 2020. The targets (known as bottomlines in the NPS-UD) are to be treated as 'minimums' not 'maximums'.

Policy 6.3.12
enables urban development in the Rangiora and Kaiapoi FDAs (new Development Areas in the PWDP) where needed to meet the medium term targets. This a 'minimum' allocation approach contrary to the NPS-UD. The NPS-UD favours over allocation, including in locations unanticipated by RMA plans, where it will add additional development capacity, can be integrated with infrastructure planning and funding, and will contribute to well functioning urban environments – as is the case the proposed Lehmans LLR D2 zone.
107. The proposed Lehmans LLR D2 zone is consistent with the CRPS except with respect to those parts of the CRPS which are out of step with and do not give effect to the higher order plan, the NPS-UD.

Proposed Waimakariri District Plan
108. An assessment of this proposal against the relevant PWDP Objectives and Policies for urban growth and development as notified on 17 September 2021 is set out in **Appendix 2.**
109. That assessment shows that the proposed rezoning is entirely consistent with the relevant objectives and policies, including as sought to be amended by this submission. Those amendments are to UFD-P3 Identification/location and extension of Large Lot Residential Zone areas; and LLRZ-O1 and LLRZ- P1-5 and reflect the intent and outcomes intended for the proposed LLRZ D2 zone, which is a higher density LLRZ zone than the PWDP LLRZ zone (renamed LLRZ D1 in this submission).

ASSESSMENT AGAINST OTHER PLANNING DOCUMENTS
Our Space 2018-2048 Greater Christchurch Settlement Update (2019)
110. Our Space is a non-statutory document prepared under the Local Government Act. It
"responds to the new Government Policy Statement on Land Transport, which has increased funding for mass public transit schemes, and meets the requirement of the National Policy Statement on Urban Development Capacity (NPS-UDC) 2016 to prepare a
future development strategy…. Specifically, it:
• sets out how targets for housing for the next 30 years will be met, accommodating an additional 150,000 people;
• identifies locations for housing growth, encouraging Central City and suburban centre living while providing for township growth in Rolleston, Rangiora and Kaiapoi;…
• promotes a compact urban form, which provides for efficient transport and locates development in a manner that takes into account climate change and sea level rise.[4].

..Underpinning this settlement pattern approach is the vision for a transformation of the transport network that fosters much greater public and active transport usage, and reduced reliance on the private vehicle.
111. Our Space acknowledges that this will require commitment from the Government to invest in the necessary improvements to our transport system, which could include investing in rapid transit services. To date, there has been no successful business case for improved public transportation, including not as a Covid 19 fast track infrastructure project.
112. The Our Space housing capacity targets (Table 3) and Future Development Areas are related to growth of urban areas.
113. Our Space, like the CRPS (and the Operative District Plan) are now out of date, as they do not reflect or give effect to the new requirements of the NPS-UD.

Waimakariri 2048 District Development Strategy (WDDS)
114. The preferred growth directions for Rangiora in the WDDS 2048 (2018) are outlined above (under 'Site') i.e. westwards to Lehmans Road, and otherwise eastwards. However, the Council in its decision on the RRS, recognized west of Lehmmans Road as a potential longer town urban growth area.
115. The WDDS Rangiora Snapshot (pp38-39) -when looking ahead to 2048 proposed that:
a) Rangiora remains the District's largest town
b) 30,000 – estimated population (2048)
c) 12,025 – estimated households
d) 5,025 - new households in Rangiora
e) Continues to accommodate one third of the District's residential growth
f) 167 – estimated annual building consents for new dwellings for the next 30 years
g) 423 hectares of additional feasible residential land required by 2048 (this includes capacity in remaining stages of existing residential developments as well as new greenfield areas inside and outside of the Infrastructure Boundary)
h) Future residential growth directions proposed to the east (predominantly) and west of the current town
i) Opportunities for intensification/regeneration to be identified
j) New growth directions take into account areas of unacceptable natural hazard risk and areas of significant environmental and cultural values
k) New growth areas to connect into existing sewer and water networks

l) Stormwater Levels of Service designed to meet increased performance requirements

116. At the 2018 Census Rangiora had a population of 17,841, and 7314 total dwellings (incl those unoccupied and under construction). Population projections for the District show an average annual change 2018-2020 of 1700 persons. If Rangiora continues to attract a third of all district growth as stated in the WDSS then Rangiora's population in 2021 will be around 18,900.

Mahaanui Iwi Management Plan

117. Part 1 of the PWDP in a section "Mana Whenua" sets out the position with respect to iwi and the review of the district Plan:

a) The District's territorial area sits within the takiwā (territory) of Ngāi Tūāhuriri which is one of eighteen Ngāi Tahu regional papatipu rūnanga, constituted under the ***Te Rūnanga o Ngāi Tahu Act 1996*** *to represent* ***mana whenua*** *interests.*

b) The preparation and change of a district plan must take into account relevant iwi documents. For the District, Ngāi Tahu has set out its resource management values, issues, objectives and policies within the Mahaanui Iwi Management Plan (2013).

c) The Mahaanui Iwi Management Plan identifies objectives, issues and policies for natural resource and environmental management for six pāpatipu rūnanga (including Te Ngāi Tūāhuriri Rūnanga). It seeks to ensure that the taonga and resources of Ngāi

Tahu mana whenua are recognised and protected in the decision-making of statutory agencies. The Mahaanui Iwi Management Plan contains a comprehensive suite of policies and objectives addressing the range of resource management matters of significance to tangata whenua. The District Council shall have regard to the Mahaanui Iwi Management Plan when preparing or changing the District Plan, to the extent its content has a bearing on resource management issues of the District.

118. The Mahaanui Iwi Management Plan (MIMP) 2013 was released on 1 March 2013.

119. The MIMP is a tool for tangata whenua to express their identity as manawhenua and their objectives as kaitiaki, to protect their taonga and resources, and their relationships with these. The MIMP seeks to ensure that these taonga and resources are recognised and protected in the decision-making of agencies with statutory responsibilities to tangata whenua. Importantly it is also a tool that assists Papatipu Rūnanga representatives to articulate their values, issues and policy into statutory processes.

120. The MIMP includes both general objectives and policies about the management of land, air, and water, and also includes catchment specific objectives and policies.

121. Section 5.3 Wai Maori (pp77-98) contains an extensive discussion about tangata whenua rights and interests in freshwater. It provides a suite of Issues, Objectives and Policies for freshwater

122. Section 5.4 Papatuanuku (pp101-124) sets out the Ngai Tahu Subdivision and Development Guidelines that are to be read along-side objectives relating to:

a) Land use planning and management in the takiwā reflects the principle of Ki Uta Ki Tai. (from the mountains to the sea)

b) Rural and urban land use occurs in a manner that is consistent with land capability, the assimilative capacity of catchments and the limits and availability of water resources.

c) Inappropriate land use practices that have a significant and unacceptable effect on water quality and quantity are discontinued.

d) Ngāi Tahu has a prominent and influential role in urban planning and development.

e) Subdivision and development activities implement low impact, innovative and sustainable solutions to water, stormwater, waste and energy issues.

123. Section 5.5 Tane (pp127-137) includes objectives that focus on:

a) Regional policy, planning and decision making in the takiwā reflects the particular interest of Ngāi Tahu in indigenous biodiversity protection, and the importance of mahinga kai to Ngāi Tahu culture and traditions.

b) The customary right of Ngāi Tahu to engage in mahinga kai activity is recognised, protected and enhanced…

c) Customary use, and therefore mahinga kai, is given effect to as a first order priority for freshwater management in the takiwā.

124. Section 6.4 (pp213-224) addresses issues of particular significance to the lands and waters of the Waimakariri catchment within which the Site lies.

125. Relevant Objectives relating to urban development of land in that catchment include:

a) The natural "energy, vitality and life" of the Waimakariri River as a braided river is protected and restored.

b) The discharge of contaminants to the Waimakariri and its tributaries is eliminated.

c) Water quality and flows in the Waimakariri and its tributaries are improved to enable whānau and the wider community to have places they can go to swim and fish.

d) The mauri and mahinga kai values of the Waimakariri and its tributaries and associated springs, wetlands and lagoons are protected and restored; mō tātou, ā, mō kā uri ā muri ake nei.

126. A key issue relating to subdivision and development is that subdivision and development activities in the lower catchment

have the potential to adversely affect Ngāi Tahu values such as waterways, mahinga kai and sites of significance (Issue Wai4).
127. The proposal provides for full urban reticulation of the three waters and is consistent with the objectives and policies contained in Chapters 5.3 and 5.4 of the MIMP. The proposal does not preclude individual land owners from installing rainwater collection and use from roof areas at the time of building development.
128. The proposal has been designed taking into consideration the potential effect of resultant subdivision and development on the rivers and streams that flow into the lowland rivers.
129. Overall it is considered that the proposal will not have adverse impact on the cultural values of iwi as set out within the MIMP.

SECTION 32 ASSESSMENT

130. A Section 32 assessment is contained in **Appendix 3.**
131. In summary, the PWDP zoning and associated rules (RLZ Zone with a minimum lot size for subdivision and a dwelling 4ha) do not meet the needs and aspirations of the current owners.
132. Strategic Council planning documents (specifically the WDDS) have a focus on only meeting urban growth demands within urban environments of existing towns. They favour intensification (15hh/ha) and a strict allocation of capacity by development areas. It is a control and command regime consistent with Map A of Chapter 6 of the CRPS but is out of step with the requirements of the NPS-UD which requires a more flexible, responsive approach, prohibits a hard fixed unmoveable urban/rural boundary.
133. This approach leaves little room for new proposals or proposals that do not sit square with the standard array of GRZ/medium density or SETZ (Settlement Zone). SETZ applies to some of the District's smaller settlements outside Greater Christchurch.
134. Neither LRZ nor Large Lot Residential (LLRZ) as notified in the PWDP is an efficient use of this block of land located as it is immediately adjoining the urban area of Rangiora, and in a location easily accessible to the town centre by active transport modes as well as car and several district reserves.
135. If this Site is not zoned for LLRZ D2 (minimum average lot size 1500m^2) use to enable residential re-development then it will drive pressure to re-zone elsewhere. That step potentially will not have the significant benefits to Rangiora long term in relation to enabling a well-functioning urban environment that enables people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future. Additionally re-zoning to LLRZ D2 will contribute to providing additional development capacity to meet the different needs of people and communities in a planned manner and consistent with the NPS-UD.
136. The Site can readily be developed to reflect the principles of the Urban Design Protocol with values of character, context, and connectivity.
137. The Section 32 assessment concludes that the proposal to re-zone the Site from LRZ zone to LLRZ D2 Zone (average lot size 1500m_2) is the most appropriate method for achieving the objectives of the proposal, than the other alternatives considered.
138. Option 2 identified in the s 32 assessment is consistent with some PWDP policies notwithstanding that it does sit square with the strategic intentions signaled in the WDDS and the PWDP approach to providing for development capacity and urban development.
139. Option 2 identified in the s 32 assessment to re-zone the Site is the most appropriate given:
a) The proposals adopt the PWDP zones, development and activity standards with appropriate amendments. This ensures continuity of the District Plan anticipated environmental outcomes and urban amenity for Rangiora and adjoining residential areas;
b) Will be consistent with and give effect to many of the relevant PWDP objectives and policies;
c) It is a logical extension to the developed and developing residential land adjoining the Site while achieving a compact, efficient urban form that removes pressure on isolated rural land elsewhere around Rangiora.
d) It gives effect to the NPS-UD, specifically Objective 6 c) and Policy 8, delivering significant additional development capacity and contributing to a well functioning urban environment.
e) It is assumed that there will be capacity in the public utilities and the existing road network, including planned upgrades, to accommodate the traffic effects of the redevelopment;
f) The proposed Site specific ODP will provide certainty of the final form and disposition of the re-zoned area including its proposals for reserves, roading, future linkages for pedestrian and vehicular traffic.
140. The re-zoning proposal is considered to be appropriate to achieve the sustainable growth and development of Rangiora.
141. The economic, social and environmental benefits of the proposed rezoning outweigh any potential costs.
142. The overall efficiency and effectiveness of the proposed rezoning (Option 2) is high, in comparison to the alternative options set out in the s 32 Assessment which are low (Options One and Four) or low to moderate (Option Three).
143. The PWDP proposes to release land for development in the new Development Areas at Rangiora and Kaiapoi through a novel and untested certification process that is not clearly derived from RMA statutory powers, nor Local Government Act 2002 (LGA) authority. This approach is not proposed for the LLR Overlay areas. As the proposed Lehmans Road LLR D2 zone proposed by this submission seeks large lot urban densities, it is anticipated that Council may favour the certification process if it accepts the proposed rezoning. This is opposed – rezoning to LLRZ D2 is sought.
144. Potential difficulties with the proposed certification process are identified and discussed in the Section 32 Assessment.

(**Appendix 3)**. In summary, the process is hugely discretionary, does not provide conventional rights to an applicant (eg right of objection/appeal) meaning decisions cannot be challenged, and it is not apparent that the process will be appropriately documented with a transparent record of the decision-making within the certification process. Further uncertainty arises in the practicalities of how to negotiate and manage the staging, funding and building of key infrastructure across a range of Sites, and a risk that land supply is controlled by a limited number of large developers. It is a far less efficient and effective method for delivering land for housing than the Council rezoning the land in the PWDP.
145. The proposed rezoning is considered to be the most appropriate, efficient and effective means of achieving the purpose of the RMA.

CONSULTATION
146. The landowners and their consultants have submitted on the WRRS and the WDDS (**Appendix 4)**.
147. The submissions to re-zone as rural residential or identify the Site as suitable for LLRZ have been rejected as noted above. LLRZ but at higher densities as now proposed is considered to be a more efficient use of the land and better meets market demand. 5000m^2 sites provide more land is needed for a spacious home and garden.
148. The landowners have been consistent in their wish to find a zone and possible land uses better suited to their needs.

CONCLUSION

173 The submission seeks to rezone 58 ha of land adjoining Rangiora from Lifestyle Rural Zone (LRZ) to Large Lot Residential with a specific density standard (LLRZ D1), minimum average lot size 1500m^2.
149. The Site has a long history of rural lifestyle use. It is not significantly restricted by potential natural hazards especially flooding, nor does it have physical limitations for development for residential purposes as it is not liquefaction prone, and has no known geotechnical limitations but does contain an area of LUC 2 soils. It is near a site of significance to iwi (SASM – 025) being the Rakahuri/Ashley River The Site has access to a collector road and is near to a strategic road giving direct access to the town centre and a range of community amenities and facilities.
150. The Site immediately adjoins the urban area of Rangiora, and is well located to join in to Council utility services. It is well suited for conversion to residential use.
151. The Site is not identified within the westward growth direction for Rangiora in the District Development Strategy 2018 nor is it part of the DEV-WR development area which adopts Lehmans Road as its western boundary. It is in a location that achieves coherent and compact urban form offering ease of access to business services, community facilities, reserves and the primary road network.
152. The proposed rezoning provides for a connected and high amenity residential living environment not presently available under the PWDP while avoiding and/or mitigating any potential adverse effects on the environment. It will provide for continuing high demand for a variety of high quality residential sections aimed at a particular segment of the housing market in an ideal location, easily accessible to the existing town centre services and facilities. It will broaden the range of housing available. As such, it is consistent with the NPS-UD including Objective 6c) and Policy 8, to be responsive to proposals which supply significant development capacity and contribute to a well functioning urban environment.
153. The use of this Site for residential purposes can be a sustainable and efficient use of land and infrastructure. The proposed rezoning better provides for the social, economic, environmental well-being of the landowners and the Rangiora community than continuation of the current low intensity lifestyle land use on 4ha blocks, or a conventional LLRZ residential use.
154. Any potential adverse effects of the implementation of the proposed rezoning can be assessed at subdivision stage but there has been no restriction on servicing the blocks to date. Capacity will need to be confirmed for infrastructure, power and road network. Any future subdivision of the Site will need to confirm water supply and wastewater treatment and disposal options.
155. Rezoning of the site to LLRZ zone is not inconsistent with the policies and objectives of the PWDP, but it is at odds with the dated CRPS approach to provision of urban growth and housing capacity for Greater Christchurch, to the extent that it is not within an FDA created by Change 1 to the CRPS and is not identified as an LLRZ site under the strategic RRS prepared by the Council.
156. As the proposal helps achieve the purpose of the RMA, and has been shown to be consistent with the relevant provisions of the NPS-UD, the submission can be accepted by Waimakariri District Council.

Original Submission

Summary Reasons for the Submission

The reasons for our submission are outlined below.
a) The preferred relief (**the proposed rezoning**) is both appropriate and necessary to achieve sustainable growth and

development of Rangiora and the District and meet the requirements of the National Policy Statement for Urban Development 2020 (**NPS-UD**).

b) The Site identified in Figure 1 and at para 1 of the Preferred Relief above is a logical and preferred location that lends itself to a specific type of housing development not provided within the PWDP as a residential option adjoining but outside the existing urban areas. Nowhere is it possible to develop in a comprehensive, coordinated way a low density, high quality residential environment in the District's towns, the Rural Lifestyle Zone or Settlement Zone as a permitted activity.

c) The requirement for 12/15 hh/ha in GRZ zones (the majority of land in urban areas) drives development to modern scale relatively small urban lots best produced as a package across a significant land holding. The GRZ subdivision standards do not provide for the needs of people who seek a generous sized urban lot residential setting. This is a housing sector that is running against the planning tide of intensification but is, nonetheless, a legitimate form of housing in an appropriate setting. The barriers to such development in urban areas requires an appropriate setting/ location in the rural areas but close to or adjoining the urban areas and at a much lower density than is desired or appropriate (the PWDP LLRZ) to meet the housing needs for generous sized urban lot residential living..

d) The PWDP subdivision standards for LLRZ require lots that are very large for those whose primary interest in a rural setting is a form of residential living, not one that requires significant maintenance and management often involving animals or machinery at scale. Conversely, the GRZ subdivision standards do not provide for the needs of people who seek a large lot residential setting

e) The focus in the PWDP is on prescribing a limited range of residential options and tightly controlling and constraining housing choice within those options. Further urban growth is also tightly constrained and controlled around DEV areas around Rangiora and Kaiapoi but for a very specific form of residential development driven off density requirements that do not match the needs of all landowners.

f) The focus in most new District Plans, driven in part by the National Planning standards, is to simplify the range of zones, to standardize lot sizes, to supposedly create efficiency and certainty through ease of administration of the District Plans. This is done by constraining housing and land development choices by lot size, by location, by built standards and the disposition of built/open elements in a site. However, the National Planning standards do provide for large lot urban residential living, a residential living option which has not been taken up the PWDP (due most likely to the restrictive provisions of the CRPS which only prescribe one from of lower density residential living, at a density of 1-2 hh/ha).

g) This planning approach may be a standard approach to resource allocation but it does not provide a flexible, responsive approach to innovative and new development options. The Government is creating policy settings that on one hand seek intensification in urban areas, while at the same time pushing away from a land allocation model of planning. The PWDP in striving to face both policy directions has a package of measures that are in fact a major barrier in terms or cost, timeframes and certainties for proposals that are not cut from the suite of housing and development options set out by the PWDP. The allocation of land in preferred development areas, it must be said, runs counter to the Government's push, and now its direction, to free up land for development, to encourage innovation in housing (presently with a focus of intensification) and to make available a range of responses to the need to meet the housing needs of people and communities set out in the NPS-UD.

h) While the weight of demand (and the planning response) is around affordable housing, around small lots and dense development that supports investment in public facilities and amenities such as public and active transport, reserves, and commercial services, there is always a wide spectrum of preferences at play in the housing market. The demand for high quality, generous houses set on generous sized parcels of land within high amenity settings is an important and no less relevant housing sector. There is a strong unmet demand, as confirmed by advice from Bayleys real estate (**Appendix 5**) for larger family homes with room for a pool or similar. Purchasers want to be close the amenities of Rangiora and within walking and cycling distance of local schools. They do not want the only available options – a 4 ha lifestyle block or 5000m^2 rural residential site at Mandeville or Ohoka.

i) Interestingly enough for a nation built on the so-called quarter acre paradise, recent policy and planning interest in housing and land development has now seemingly positioned the 1011m^2 section as a luxury item, as the antithesis of providing for community well-being and needs. It is as though the old quarter acre of itself acts against building a sense of community despite being able to be developed in a planned, structured, coordinated or integrated manner. Rather than being a frivolous discretionary item in land development
and housing choice, a well-planned, well located and properly serviced low density residential environment has much to offer urban environments. They can be tactically used to provide shape and edge to urban areas, they can provide a mass of amenity different from (and potentially complementary to), but no less legitimate in urban outcome terms, to conventional GRZ zoned land.

j) In many ways the approach of a district plan to the role and place of the old quarter acre is not dissimilar to the issues faced by comprehensive retirement villages when first proposed. The idea of dense, almost gated and self-contained communities, with multi storey buildings also did not sit well in many district plans. But now they are accepted as an important part of the urban fabric catering to a specific demographic and health demographic. Most plans enable them.

k) Provision for low density residential in an urban setting, or failing that likelihood, in an adjoining rural zone is a fundamental gap in the district plan.

l) The submission seeks to provide for another housing typology not provided in the PWDP and in a location with significant planning merit. The planning case was made out in a detailed submission to the proposed Rural Residential Strategy (**RRS**) for

the land identified in this submission to be “reserved” for conventional Rural Residential zoning in the review of the District Plan. That submission was rejected in favour of a decision ascribing an unspecific strategic significance to Lehmans Road as the urban boundary; simply the decision was that rural residential development here would preclude this area as a future urban growth path, even though this was likely to be very long term as the Waimakariri District Development Strategy (WDDS 2018) for the period up to 2048, does not favour urban growth west of Lehmans Road.

Officer Recommendation

Continue to exclude the area west of Lehmans Road and the racecourse land at Rangiora as growth areas as these were originally considered but not included in the draft RRDS as they trigger the key preliminary criteria of: being on the direct edges of a main town outside of the Projected Infrastructure Boundary (PIB) thereby foreclosing more intensive long-term urban development, and…

Panel Recommendation

The panel accepted the officer recommendations to exclude areas on the fringes of Rangiora in the final RRDS due to these having the potential to foreclose more intensive long-term urban development of the town.

m) In light of the above decision on the Waimakariri Rural Residential Strategy, the proposal now is for a form of high amenity low density urban zoning, which whilst in demand is entirely absent from the PWDP. This will be a long term urban form of development. The proposal set out in the submission will achieve a compact, and efficient, urban form on the edge of Rangiora with excellent connectivity by multiple transport modes. It provides for continuous urban development by enabling a built form which can act as a strong zone or urban boundary.

n) The proposed rezoning will accommodate approximately 311 LLRZ lots1 at the proposed amended density standards for LLRZ D2 (average size 1500m^2). It will contribute to a well-functioning urban environment, meeting the NPS-UD Objective 6(c).

o) Any adverse effects on the environment arising from the proposed rezoning will be minimal, if any, and can be adequately mitigated. A high amenity master planned development is proposed.

p) Significant positive effects arise from the proposed rezoning. It will enable the short term housing demand at Rangiora to be met, and can deliver a housing typology for which there is demand, on lots that are not a burden to the landowners (which is the case for 4ha and the very limited areas of LLRZ D1 with a density of 1-2 hh/ha) and for which there is no provision in the PWDP. At present rates of land uptake there is about 4 years vacant land supply in Rangiora. Given it takes 3-5 years to bring land from zoned state to on the market as developed lots, there is some urgency in providing additional capacity. This proposal helps address an anticipated shortfall in residential zoned plan enabled land.

q) There is no additional cost to the Council in re-zoning the Site as there is expected to be capacity in the public utilities and the existing road network, including planned upgrades.

r) Amendments to PWDP objectives and policies may be necessary to provide for a higher density LLRZ, but of themselves will not act against those relating to Strategic Directions Urban Form and Development and Urban Growth. The PWDP approach to zones and
identification of future development land is already out of step with higher order Resource Management Act 1991 (RMA) statutory documents because they do not give effect to the NPS-UD (and are sought to be amended through this submission).

s) The alternatives of retaining Rural Lifestyle or Large Lot Residential zone across the entire Site are not an efficient use of land which immediately adjoins the urban area of Rangiora, and is highly accessible to the town centre by active transport modes as well as car.

t) The proposed rezoning is consistent with and the most appropriate, efficient and effective means of achieving the purpose of the RMA.

The Site

1. The Site is a 58ha block of land (‘the Site’) accessed from Lehman Road, Rangiora **(Figure 1)**. It is owned by the two submitters and 12 other landowners.

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1 Assumes 20% of land area taken for servicing including roading, reserves and stormwater management if required.

Figure 1: The site (outlined in blue (Google Earth)

2. The Site is surrounded by RLZ land that is used for a mix of lifestyle and conventional farming. To the NE is the Rangiora Eco Holiday Park, and beyond the Park is the Rangiora Racecourse about 300m away from the nearest lot and 1km from the centre of the Site. Land to the south east is GRZ and part of urban Rangiora with newly developing residential land west of West Belt. About 1.9 km to the NW is Rangiora Airfield. About 1km north of the most northern lot is the Ashley River.
3. The southern-most lot in the proposal with the Rangiora Vet Clinic faces, but does not have access to Rangiora-Oxford Road (State Highway 72). This arterial road provides the main road connection in to the centre of the town. The well-established Fernside Rural residential area is about 2.5km west from the junction of Lehmans and Rangiora-Oxford Roads.

Figure 2: the site is a broader context (Site marked red)

4. The Site is not identified as lying within a preferred growth direction for Rangiora in the Waimakariri 2048 District Development Strategy (2018) (**WDDS**) **(Figure 3)**. No land west of Lehmans Road is included in the West Rangiora Development Area (**DEV-WR**) in the PWDP.

Figure 3: Figure 11 WDDS

5. The Council reviewed its strategic approach to the location and provision of Rural Residential land (now zoned LLRZ in the PWDP) in the WDSS. It adopted the position that it would:

a) Explore tools such as cluster development to manage rural character

b) For rural residential development, adopt an approach that has a primary focus on creating new rural residential areas, with a secondary focus on enabling large lot intensification within existing rural residential areas where there is sufficient community support and servicing available

c) Review the Rural Residential Development Plan for the whole District (pg 21 WDDS).

6. Rangiora presently has a population of 17,841 (2018 Census). It grew steadily between 2006 and 2018. Growth of Rangiora since then has continued in step with the district growth which has increased 8.2% between 2018 and 2021 from 61,300 to 66,300 at an annual average of 2.8% from 2018 to 2020 (Statistics NZ Subnational population projections at 30 June 2021: provisional).

2006 (count)	2013 (count)	2018 (count)
12,165	15,069	17,841

Statistics NZ

Population projections at 30 June

PLANNING STATUS OF THE SITE

Chapter 6 of the Canterbury Regional Policy Statement

7. An assessment of the CRPS is set out in **Appendix 1** to this submission.
8. The Site is within the Greater Christchurch area.
9. It was not shown as a Greenfield Priority Area – Residential (GPA) on Map A of the Canterbury Regional Policy Statement (CRPS). The GPA terminates at Lehmans Road.
10. As a result of the Minister for the Environment's decision of 28 May 2021 on Change 1 to Chapter 6, an area largely south of Oxford Road and a finger of land to the north of Oxford Road was included as a Future Development Area (**FDA**) (**Figure 4** orange).

Figure 4: Map A Chapter 6 Regional Policy Statement Greenfield Priority areas
Site location identified with red circle (appx)

11. The FDAs are intended to accommodate the increased demand for new dwellings in that part of Waimakariri District within the Greater Christchurch Urban Area and to respond to the NPS-UD. They do not provide "plan enabled" land as they need to negotiate a rezoning process to confirm their status as land developable for housing and other urban purposes.
12. The proposal for a LLRZ zone with average lot sizes of 1500m2 is inconsistent with the policy approach of Chapter 6 for Greater Christchurch, in that if fits none of the residential living typologies provided for in Chapter 6 and is not in a location identified for urban or rural residential development. It sits 'between' the urban and rural residential densities provided for in the CRPS (minimum 10 hh/ha for urban in Waimakariri, and average 1-2 hh/ha for rural residential). The proposed density is appx. 6.66 hh/ha.
13. Notwithstanding, the proposal meets all the location and other criteria in CRPS Policy 6.3.9 for rural residential development. It is:

- Outside the CIAL noise contours
- Has some sites with restrictions from the take-off and landing vectors for Rangiora Airfield but not such as to impact its operational capacity.
- Is outside the groundwater protection zone
- Is not within the Waimakariri stop bank system
- Has no views of or to the Port Hills
- Has good access for emergency services
- Will not create reverse sensitivity issues with adjoining land uses; Rangiora Racecourse is 500m away.
- Free of significant natural hazards and is a flat site.
- Supports no significant natural values or ecological values.
- Contains no SASMs.
- Can be integrated into or consolidated with the existing urban area of west Rangiora.
- Contains no surface water bodies so there will be no adverse impacts on these.
- The development will be contingent on an ODP to provide integrated design for subdivision and land use, and provide for the long-term maintenance of a high quality high density rural residential character.
- The proposal is not intended as a staged development towards full urban; rather it is intended to provide a unique residential environment that can stand alone and contribute to the urban fabric of Rangiora like Palmview in east Rangiora, or as Kaiapoi Lakes does for Kaiapoi.

14. Overall, the proposal is not consistent with Chapter 6 but that is more a function of its original purpose when formulated in 2013. Notwithstanding that, the submission for a lower density residential focussed, high quality urban environment that attaches to an existing urban area and that promotes a coordinated pattern of development has planning merit.

Operative Waimakariri District Plan
15. The Site is zoned Rural in the Operative Plan. The minimum lot size for subdivision and a dwelling is 4 ha.
Proposed Waimakariri District Plan
16. The Site is zoned Rural Lifestyle Zone **(LRZ) (Figure 4).** The minimum lot size for subdivision and a dwelling in the LRZ is 4 ha.
17. Oxford Road is a strategic road and Lehmans Road is a collector road.

Figure 5: Proposed District Plan Zoning (site outlined in red)

18. The Site is also subject to, or potentially influenced by, a number of Overlays:
    a) Rangiora Airfield Take Off Climb and Approach Obstacle Limitation Surface (**Figure 6**)
    b) National Grid Transmission Lines (**Figure 6**)
    c) Liquefaction: Liquefaction damage is unlikely (**Figure 6**)
    d) Non-Urban Flood Assessment Area (**Figure 7**)
    e) Geographic areas: Ecological Area – Plains

f) Ecological District – Low Plains

Figure 6: Rangiora Airfield Take-off and Approach vectors (blue dashed lines); Liquefaction damage unlikely (green)Transmission lines (green lines); Site outlined in red

Figure 7: Non-urban flood assessment & Waimakariri Flood Hazard maps
Blue – medium risk, green – low risk, white – very low

DEVELOPMENT PROPOSAL AND PROPOSED REZONING

19. Subdivision of the Site will create approximately 311 LLRZ D2 lots.
20. The key design drivers for the proposal are:

a) A high amenity premier residential zone with large houses on large sites – average 1500m^2, min 1000m$_2$ based on the St Kilda, Hamilton development concept (**Figure 8**).

b) LLRZ D2 standards would enable a lower density zone in the medium term e.g. 10 years to achieve a high quality consistent character subdivision. If developed as an integrated development subject to an ODP subdivision can be staged for to the proposal.

c) Creating strong connections with the immediate neighbourhood by providing a cohesive interconnected roading layout that picks up direct links to the eastern neighbourhood off Lehmans Road and the northern subdivision roading, and carries them into the Site.

d) Creating a high amenity and diverse residential neighbourhood by providing interfaces to roads, reserves and rural environments.

e) Respecting and building on local identity and character of Rangiora by retaining specific vegetation features from the Site, and anchoring the development into the wider landscape.

21. A development concept can provide for sound urban design by:

a) A hierarchy of movement corridors.

b) Prioritisation of walking and cycling.

c) A north-south alignment of street blocks to maximize solar access and provide for efficient use of lots.

d) Block perimeters being kept as small as practicable to aid permeability and higher public amenity.

e) Enabling a range of housing typologies set in high quality landscape and street setting with generous amenity plantings and curtilage.

Figure 8: St Kilda development images (Bayleys)

22. St Kilda, Cambridge is a premier development on the outskirts of Cambridge, centrally located and with easy access to the Waikato Expressway. It was originally part of a small dairy operation which was dissected by the Waikato Expressway, leaving a portion within the Cambridge Town boundary and the larger balance of the property of approximately 80 ha (which became St Kilda) on the Eastern side of the Expressway, left in the Rural Zone.
23. The initial development concepts were for a Rural Residential type development given the Expressway separation of the existing residential development on the Western side of the Cambridge Bypass, however this was not supported by Council and a new concept of larger residential sections of a 1600m² average size was developed and approved – see https://www.stkilda.nz/page/location/

EFFECTS ON THE ENVIRONMENT

Township growth and urban form

24. The Site immediately adjoins the western edge of urban Rangiora.
25. The WDDS indicated a general preference for the direction of urban growth of Rangiora to the east as a way of balancing up the residential areas around the town centre and some growth to the west.
26. The approach of the WDDS was to signal growth options to be confirmed in the District Plan Review:

The broad directions for greenfield residential growth for the District's main towns are set out in Figures 11 to 14. Further work will be carried out to identify and confirm the exact locations and extent of these residential growth areas, together with the intensification opportunities within existing urban areas. These will be enabled through the District Plan Review and other planning tools.

27. The Strategic Planning documents clearly signal active consideration of growth needs and growth directions. The options available to the Council were constrained by the approach of the CRPS as the District Plan has to give effect to the CRPS and cannot be
inconsistent with it. The CRPS took effect in 2013 and is overdue for review.
28. The CRPS tightly holds urban growth to the constraints of Map A Chapter 6 and the identified FDAs which although amended by Plan Change 1 in 2020 does not respond to the directions of the NPS-UD. In any event the approach is focused on the need for housing in full urban residential land, less on other residential development forms.
29. As such the Site falls outside the planning policy framework for urban growth. However, in terms of urban form and on the ground, there is considerable merit and logic to conversion of this existing LRZ land to a new high amenity residential form that can be integrated into the Rangiora urban fabric.
30. The proposal has the potential to anticipate the longer term growth path confirmed by the decisions on the RRS to protect the future growth option of more intensive urban development in this direction. It can set a pathway to further westward expansion on land
that holds few if any physical barriers to land development.
31. The proposal will contribute to the housing needs of Rangiora and in a form and location that does not undermine the long run urban form of Rangiora. Planned growth confirmed in the PWDP is already intended to extend westwards out to Lehmans Road and to keep the town edge squared up providing depth to future development and providing a rational basis for providing movement networks driven off the key roads such as Rangiora-Oxford Roads. The West Rangiora Future Development Area confirms this approach. The Site sits in the next block west of Lehmans Road so is not proposing a disjointed urban form, nor one that is not part of the long term thinking of urban form and growth for Rangiora.

32. A full residential zoning is proposed under LLRZ D2 and will provide a high quality street character, overall amenity and passive surveillance over the street, and will create the correct lighting standards, roading standard, fully formed footpaths and cycleways required for a high quality urban environment.

Neighbourhood and wider community effects
33. The Site is serviced by a collector road and is close to an arterial road. This provides for ease of access and safe and convenient movement to and from the Site. A planned development co-ordinated by an ODP can facilitate within the site movement corridors and linkages through the Site to provide for walking and cycling.
34. A key positive neighbourhood and community effect will arise from the existing dwellings and their established gardens and plantings that will anchor new development and provide a point of reference for new dwellings. Development will not be on a bare site; it will take place in an existing established part-residential setting. The transition to a low density, high quality premier residential development will start from a favourable position and minimise the apparent extent and nature of the landscape change.
35. The Site is comparatively large (58.4 ha) and has the potential to support a variety of residential building typologies and this will contribute to a mix of households within the development and provide built form variety and interest in the streetscape. Whilst LLR D2 standards are proposed, it may be that part of the Site is suitable for other higher density forms of development, which would be within scope of the alternative relief, and could be considered as part of the master planning process required for preparation of an ODP (ahead of the hearing). The earlier stages of the St Kilda development were for large lot residential, with more clusters of townhouses included as later stages (and a retirement village). A retirement village is unlikely in this case, given the proximity of the Charles Upham Retirement Village.
36. Rangiora is well-positioned to accommodate and service the needs of a fast-growing resident population that will in turn support more business activity, schools, community facilities and community organisations.

Effects on tangata whenua values
37. The Proposed District Plan does not identify any Sites and Areas of Significance to Maori in the Site, but the nearby Rakahuri/Ashely River identified as SASM-025. This has been scheduled as being
River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species
38. The PWDP has Policy SASM-P8 which is relevant to pre-development processes:
Engagement with rūnanga
Te Ngāi Tūāhuriri Rūnanga and the District Council to encourage engagement with the Rūnanga priorto persons undertaking activities and/or applying for resource consent where the activity has thepotential to adversely affect identified sites or areas of Ngāi Tūāhuriri cultural significance. Where priorengagement with Te Ngāi Tūāhuriri Rūnanga h as not been undertaken by an applicant for an activitythat has the potential to adversely affect an identified site, the District Council will consult with the Rūnanga.
39. The Site is not listed as an archaeological site on the NZ Archaeological Site database.

Landscape and visual effects
40. Rural Lifestyle style development exists on the Site now (a series of 4 ha lots with a dwelling and associated accessory buildings on each). The landscape is dominated by shelter belts, utility buildings, significant trees and planted curtilages around

dwellings many of which are well set back off the roads down RoWs.
41. An ODP will help to achieve an integrated, cohesive and coherent development The proposal will lead to a modification of the landscape of the Site from a predominantly lifestyle block landscape to a denser semi-urban environment dominated by residential building that will, in time, get the benefit of street tree and reserve plantings and landscape treatments around the houses.
42. The visual effects which will arise from a change in the number of vegetative and built elements in the landscape are significant, but not avoidable, if the Site is to contribute to the on-going growth of Rangiora. The change will contribute to a high quality amenity and quality of environment and one that will be entirely consistent with and supportive of the rural lifestyle residential development that has successfully established on the Site.

Well-functioning urban environments
43. The Site adjoins the existing built up urban area of Rangiora. Immediately to the east are existing or developing residential areas.
44. The conversion of the Site from present rural lifestyle uses to low density, high quality residential will continue a pattern of outward expansion of Rangiora. Such a change may not be consistent with the PWDP's identification of a Future Development Overlay for west Rangiora only as far west as Lehmans Road, but on the ground it will look and integrate as part of the urban fabric.
45. It will provide some replacement lower density living areas for the existing LLR zones at north west Rangiora – but at much more appropriate higher density that the LLR D1 standard which is 1-2 hh/ha. There are two such areas, shown on the planning maps below. River Road has an 'urban overlay' and is intended to be intensified to urban densities. The land on the opposite (east) side of Lehmans Road is a 'legacy' rural residential zoning which applies under the Operative District Plan. The landowners have developed the adjoining residential subdivision and wish to develop the land for full urban residential development. Services are in place to support this. The constraint to date has been Map A of the CRPS which does not include the land as a Greenfield Priority Area or Future Development Area, GR zoning of this land is consistent with the NPS-UD.

Figure 9: PWDP as notified – LLRZs shown in light grey. Diagonal stripes – urban growth overlay.
Site outlined in red.
46. Rangiora is growing apace. It is attracting significant interest from new home buyers as people respond to the significant investment in upgraded transport links (Northern Corridor and public transport) and a growing economic base for employment within the District and the City.
47. Rangiora has excellent connectivity to the City, both via the new Northern Corridor, and a nascent cycleway link into the City. There is a very regular bus service every half hour.(the No 1 Blue Line) The standard trip takes 70 minutes, and there is a twice daily weekday morning express service from Rangiora, and seven times weekday express out to Rangiora all via Kaiapoi.
48. The Site will step out the western edge of Rangiora, but as it exists in a peri-urban form now, such a change does not alter how the Site interacts with Rangiora as a whole. It is in many ways a functional part of urban Rangiora now; it's only the Zone boundaries and policy framework that create the sense of it not being part of Rangiora.
49. The Site is convenient to the Rakihura/ Ashley recreation trails, the racecourse, Arlington Park, and the airfield. The town centre is easily accessible.
50. The following assessment of the criteria in the NPS-UD for determining a well-functioning urban environment shows that the proposed rezoning will deliver urban, housing and residential outcomes that meet those criteria. There will be a variety of homes enabled by generous lot sizes. The Site is well-positioned, building as it does on an existing township well-serviced by public transport and cycling options, to provide good accessibility to jobs, community services, and open spaces, as well as mitigating climate change impacts and future natural hazards by being not near the coast and well removed from major rivers.

NPS-UD Policy 1

Planning decisions contribute to well functioning urban environments, which are urban environments that, as a minimum:	**Assessment**

(a) have or enable a variety of homes that: (i) meet the needs, in terms of type, price, and location, of different households; and (ii) enable Māori to express their cultural traditions and norms;	The proposal is to have larger lots supporting predominantly standalone dwellings and associated accessory buildings (including generous sized garaging) in an open landscaped garden setting. This will fill a gap in the range of housing typologies available at Rangiora and contribute to a better functioning urban environment overall at Rangiora. It is not necessary for each individual rezoning proposal to have a wide range of housing typologies, and in some circumstances this may not be appropriate. The rezoning will deliver a premier high amenity urban subdivision with generous sized lots which will complement existing and planned higher density residential development at west Rangiora. There is scope with the relief sought for a mix of residential densities. The appropriateness of this can be considered at the master planning/ODP stage. The Site has the potential to create a unique urban environment in Rangiora. It can follow the example of Palmview based on a lake or Kaiapoi Likes providing a niche housing option in Rangiora and the District meeting a need for residential land not constrained to GRZ standards.
(b) N/A business sectors	
(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and	The Site has access to a collector road and a strategic road providing easy access to key community amenities and facilities. The town is served by a public bus route to the city, and a cycle trail connecting to Kaiapoi and the City. The new West Rangiora Development Area adjoins the Site to the south. The Site will become closer to Rangiora public transport routes as they extend out to service this new growth area over time. The Site is in walking distance to Arlington Park and the Rakahuri/Ashley which contains abundant recreations pace. It is easily accessible to the town centre and within walking distance to the Huntingdon Drive local centre.
(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and	The demand for housing and land in Rangiora is largely ahead of the planning means to respond. This proposal will “top up” the land presently set aside in the PWDP and provide a useful buffer to demand. The Site owners have been keen to release this land for more intense development for some time; there is no prospect of land banking.
(e) support reductions in greenhouse gas emissions; and	The Site has significant advantages in being easily accessible to the town centre and reserves, community facilities and schools. The proposal retains a consolidated form to Rangiora with good connectivity and linkages to recreation space and commercial centres reducing the need for car travel.
(f) are resilient to the likely current and	The Site is within the area of influence of a major river but the non-urban flood assessment maps do not show extensive flooding likely at the Site.

future effects of climate change	Being inland it is not at risk from climate change induced extreme natural hazard events like sea level rise. or river flooding.

Effects on ecosystems and habitats

51. The Site is currently used for a mix of low intensity (grazing) farming, and lifestyle purposes. Shelter belts and utility buildings have been established

52. The Site has been identified in the PWDP with two ecological overlays (the PWDP ecological overlay – Plains and Low Plains Ecological District). They are a district-wide overlays and no specific ecological values have been identified in the Proposed Waimakariri District Plan. These overlays seek primarily to retain indigenous vegetation. The PWDP identifies SASM 025 nearby the Site. That is a Site and Area of Significance to Maori and in SASM - Schedule 1 is identified as *being River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species.*

Effects on natural and physical resources

53. The Site drains in a SE direction towards the newly developing residential area.

54. There will be a degree of site disturbance as part of creating the roading network, and reserves, and as part of curtilage development on each lot.

55. The proposed use for residential activity inevitably leads to loss of some rural productive potential as land owner intentions are not about farming or productive use of the land, but lifestyle use and enjoyment. Built forms and hard surfaces become more dominant.

56. The Site comprises 4ha bocks now and these are not able to be used effectively for productive purposes other than for intensive productions based on tunnel housing and other supported production systems. None exist in the Site now.

57. The Site contains Class 2 and Class 3 soils as defined in the NZ Land Use Inventory (Landcare Research) Land Use Capability classes 1-3 **(Figure 10)**. Productive use of these soils other than for low level purposes i.e. grazing, is not feasible given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production).

Figure 10: Site soils: Site outlined in red; (Canterbury Maps)
Class 2 soils: bright green/Class 3 soils: light green;

Discharges of contaminants into the environment

58. There will be no discharges of contaminants into the environment. Wastewater will discharge to the Council's reticulated system.

59. Stormwater discharges will potentially be to ground given ground conditions or to an approved and consented stormwater management and treatment area which will meet all relevant Council standards.

Risks from natural hazards or hazardous installations

60. The PWDP planning maps show the Site as being within a Non-Urban Flood Assessment Area.

61. The District Plan maps do not identify high flood hazard areas or high coastal flood hazard areas, rather these are identified through the flood assessment certification process. This enables the most up-to-date technical information to be used. However, as a guide, areas that are potentially high hazard can be identified through the Waimakariri District Natural Hazards Interactive Viewer (NH - Introduction).

62. Rules that refer to a Flood Assessment Certificate require a certificate to be obtained from the District Council to determine compliance with the relevant rule. The alternative is to apply for resource consent as set out in the rule.

63. Rule NH-R2 states
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;

64. Assessment of flood risk and consequence can be undertaken at subdivision stage.

65. There will be no hazardous installations proposed on the Site.

Geotechnical assessment
66. The PWDP planning maps show the Site as being “Liquefaction damage is unlikely. Standard investigation procedure outlined in NZS3604 is appropriate”.

Contaminated land
67. A Preliminary Site Investigation can be carried out for the Site at subdivision stage.
68. An enquiry of ECAN has identified that two sites at the northern end of the Site potentially contain some contaminated land, which can be investigated further at subdivision stage **(Appendix 6)**. 315 Lehmans Road is an unverified HAIL site (previous use for clay target shooting) and 317 is registered as containing uninvestigated persistent pesticide bulk storage.

Servicing
69. Proposals for servicing the Site and the effects from such servicing in relation to domestic water supply, wastewater, stormwater, roading, and telecommunications will be required for any subdivision consent.

Economic effects
70. It is anticipated that urban development will generate positive economic effects, both from the investigation/development phase and for the longer run economic activity from householders participating in the local economy.

Climate Change effects
71. An assessment of the effects of the proposed rezoning on climate change is included as part of the assessment of a well-functioning urban environment above.
72. A well-functioning urban area that is designed and serviced in an integrated manner, applying sound urban design principles, will enable a reduction in greenhouse gas emissions compared to unplanned, ad hoc development that does not create compact urban forms located where the services and benefits of existing, established urban areas are not readily accessible.
73. There is a triangle of planning influence that can be brought to bear on reducing greenhouse gas emissions
a) Compact urban form minimising distances between homes and work/play options.
b) Proximity of homes to community facilities, services and amenities and business/work areas.
c) Design and provision of movement corridors and linkages that create opportunities other than for vehicles for getting around.
74. The Site of the proposed rezoning:
a) Helps in retaining a compact urban form to Rangiora.
b) Is easily accessible to the town centre and is located convenient to the recreation resources of the nearby Rakahuri/Ashley River, the airfield and racecourse and Arlington Park.
75. Rangiora has excellent connectivity to the City, both via the Northern Motorway, the new Northern Corridor, a cycle way link to Kaiapoi which is linked to the new north city cycle way along the Northern Corridor and a very regular bus service.

Positive effects
76. The proposed rezoning will provide for the continued growth of Rangiora by managing the development through an ODP. The proposal will provide a buffer to on-going high level demand for lots in Rangiora. It will cater for a specific housing need not found in GRZ Zoned land nor LLRZ land. The proposed rezoning is anticipating a form of development that is a much more efficient use of a qualifying site supporting a well-functioning urban area. It is a positive endorsement of Rangiora as a growth node in the District.
77. The benefits derived from a planned ODP approach include facilitating high levels of connectivity, creating community links to identified focal points. The Site is close to recreation facilities. A coordinated and integrated development will provide a distinctive environmental quality and point of difference to the development.
78. The Site adjoins existing and developing residential development on the western edge of Rangiora.
79. From a community well-being perspective, the provision of additional land for residential growth will continue to support the Council’s investment in community infrastructure by maintaining and facilitating growth rates, increasing the rating base and attracting development contributions.

STATUTORY PLANNING ASSESSMENT
80. Submissions must be assessed under the provisions of the RMA, including Part 2 and Section 32 (Requirements for Preparing Evaluation Reports).

National Policy Statements
National Policy Statement on Urban Development Capacity (NPS-UD)

81. The NPS–UD applies to this proposal as it is directed at Tier 1 urban environments, and Tier 1 local authorities which includes Waimakariri District as part of the Christchurch urban environment that is defined in Table 1 of the NPS, and additionally defined as:

any area of land (regardless of size, and irrespective of local authority or statistical boundaries) that: is, or is intended to be, predominantly urban in character; and is, or is intended to be, part of a housing and labour market of at least 10,000 people.

82. The NPS-UD recognises the national significance of:

a) Having well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future; and

b) Providing sufficient development capacity to meet the different needs of people and communities.

83. The NPS outcomes are to be achieved through objectives that address:

a) Planning decisions improving housing affordability by supporting competitive land and development markets.

b) Regional policy statements and district plans enabling more people to live in areas of urban environments near centres or areas with employment opportunities, area well serviced by public transport or a high demand for housing in the area.

c) Urban environments developing and changing over time in response to diverse and changing needs of people, communities and future generations.

d) Local authority decisions on urban development being integrated with infrastructure planning and are strategic over the medium term and long term.

e) Local authority decisions on urban development are responsive particularly for proposals supplying significant development capacity.

f) New Zealand's urban environments support reductions in greenhouse emissions and are resilient to current and future effects of climate change.

84. The key method to achieve these objectives is by development of a Future Development Strategy (FDS). This will set out how the Councils will provide for sufficient development capacity over the next 30 years to meet expected demand. There is no FDS for the greater Christchurch Urban Area that meets the requirements of the NPS-UD.

85. Work on development capacity completed for the NPS - UDC 2016 by the Greater Christchurch Partnership as an Update of the existing Urban Development Strategy (UDS) – Our Space 2019 confirmed what there was a shortage of feasible development capacity for future housing in Waimakariri District for the medium (next 10 years) and long term (10 to 30 years) periods. That assessment is now out of date as it does not address the requirements of the NPS-UD; and rates of take up of land have exceeded projected rates.

86. One of the key changes in the NPS-UD is that local authority decisions on urban development that affects urban environments are responsive, particularly to proposals that would supply significant additional capacity. It also amends the required methodology for housing and business capacity assessments.

87. The current CRPS does not meet the new NPS-UD requirement in relation to proposals for significant additional capacity. Regional councils are required to include criteria in the RPS to determine what plan changes will be treated for the purposes of Policy 8 as adding significantly to development capacity as soon as practicable. ECAN has yet to respond to this requirement.

88. The NPS-UD has immediate effect, so in the meantime, proposals such as this submission must be assessed in the context of the overall intent and purpose of the NPSUD as articulated in the NPS-UD objectives and policies. This includes that NZ has well-functioning environments; provides sufficient development capacity to meet the different needs of people and communities; planning decisions improve housing affordability to contributing to competitive house and land markets; and RMA plans enable more people to live near major employment areas, where there is existing or planned public transport, and where there is high demand for housing.

89. The NPS-UD is the higher order document and its requirements override those of lower order documents where there is a conflict, including regional and district RMA plans.

90. Key objectives and policies in the NPS-UD are assessed here:

NPS-UD Objective/Policy	**Assessment**
Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	The proposed development will further enable Rangiora to sustain itself as a well-functioning urban environment by consolidating the residential area close to the town centre, and provide residential development close to public transport links and existing community and commercial facilities including Huntingdon Drive local centre. The proposal provides choices in the Rangiora housing market and in doing so

Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.	supports housing affordability. Whilst the proposal is for a premier larger lot urban residential development, it is important that all sectors of the market are catered for. This will be more affordable than forcing those wanting large sections out to the much larger and very limited areas of LLR D1 development, or having to purchase 2-3 sections in a standard residential subdivision. There Site is in multiple ownership and the landowners are working together to achieve the rezoning. It will bring more competition into the market by bringing new entrants into the market.
Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply: the area is in or near a centre zone or other area with many employment opportunities the area is well-serviced by existing or planned public transport there is high demand for housing or for business land in the area, relative to other areas within the urban environment.	The CRPS is due for review in 2024 but in the meantime the existing CRPS is not in accordance with the NPS-UD 2020. The proposed rezoning is on the edge of the District's largest centre, which offers a wide range of community and business services, and employment opportunities. It is expected that a proportion of future residents will commute outside the township, but as the township and associated business areas e.g. at Southbrook, continue to grow, this is expected to become proportionally less. Rangiora is well serviced with public transport, there is scope for future mass transit PP, and there is a high demand for housing at Rangiora. The Site adjoins the new West Rangiora Development Area, to the south. Extensions of public transport to service this growth area will be readily accessible to the Site.
Objective 6: Local authority decisions on urban development that affect urban environments are: integrated with infrastructure planning and funding decisions; and strategic over the medium term and long term; and responsive, particularly in relation to proposals that would supply significant development capacity.	Whilst not currently identified as a future growth area in RMA documents, the Site is well placed at the township edge to be serviced by existing infrastructure. Some upgrades may be required, which will be investigated further with Council prior to the hearing. See Policy 8 below for commentary on proposals which supply significant development capacity
Objective 8: New Zealand's urban environments: support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change	The proposal adjoins the existing built up are of Rangiora, close to public transport links. Its excellent accessibility to Christchurch City, substantially enhanced with the new Northern Motorway extensions, means it is now highly accessible to these nearby major employment areas. Travel distances are relatively short, minimising vehicle miles and the potential for greenhouse gas emissions. There is a cycleway link from into Christchurch City, and regular bus services, including an express route. The Site is inland and not subject to natural hazard risks associated with sea level rise arising from climate change.
Policy 1 – Planning decisions for well-functioning urban environments	Assessed at para 41-50
	The proposed rezoning is anticipated to provide sections that will be available for the short term (up to 3 years) and into the medium term (3-10 years) if adopting a more conservative outlook.

Policy 2 - Sufficient development capacity Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.	The locational and amenity advantages of Rangiora also favour strong ongoing demand. The PWDP UFD-O1 Feasible Development Capacity for residential activities identifies the need for 6300 residential units in the period 2018-2028, and 7100 residential units 2028-2048. These numbers are derived from Chapter 6 CRPS Table 6.1. and are out of date. Data from the Council (November 2021) confirms that there are about 800 vacant lots in Rangiora. Building consents are at about 180/year. That means there is about 4 years vacant land supply. A lead in time of 3-5 years is needed to go from rezone to house build so the Council is facing an unnecessary squeeze on land availability. That will translate in to an upward shift in land and section prices as has been the case at Rolleston. The data suggests that the PWDP will be late to the party to ensure there is at least sufficient development capacity to meet expected demand for housing land over the short term, medium term, and long term. There is a looming, inevitable land supply issue so any proposal to add capacity will push the Council closer to meeting the requirements of the NPS-UD. The proposal is consistent with ensuring there is at least sufficient land supply for housing.
Policy 8 – Responsiveness to plan changes Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is: (a) unanticipated by RMA planning documents; or (b) out-of-sequence with planned land release	The proposed rezoning is not anticipated by RMA documents - it is not a Greenfield Priority or Future Development Area in the CRPS, or a New Development area in the PWDP. A responsive approach to the proposal is required as it meets the Policy 8 criteria for unanticipated zoning. It will contribution to well functioning urban environments and will add significant development capacity. There is no development capacity for the housing typology proposed – so any provision is significant in this context. The development will deliver appx 311 high amenity large lot residential sites at an average density of 1500m2. This will be higher if a mix of densities are proposed, which may be appropriate in some parts of the Site, dependent on master planning work to follow.

91. Adopting the submission to re-zone the land, and enable the proposed development on the submission Site will satisfy the objectives and policies of the NPS-UD.

Proposed National Policy Statement for Highly Productive Land (NPS-HPL)

92. The Government proposed in 2019 a NPS-HPL to prevent the loss of productive land and promote its sustainable management. The overall purpose of the proposed NPS-HPL is to improve the way highly-productive land is managed under the Resource Management Act 1991 (RMA) to:

a) Recognise the full range of values and benefits associated with its use for primary production
b) Maintain its availability for primary production for future generations
c) Protect it from inappropriate subdivision, use, and development.

93. The NPS-HPL is still a proposal and not intended to take effect until after Gazettal. At the date of this submission the NPS-HPL has no effect and no assessment of it is required for the purposes of this submission.

94. The Proposed NPS-HPL interim definition of HPL is land defined as Land Use Capability Class 1-3 soils. A portion of the Site contains Class 2 and 3 soils (see **Figure 10)**. Highly productive use of these soils is not realistic given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production). Its present use as lifestyle blocks, low level grazing and agistment is the more likely long run use of the Site if not rezoned.

95. Objective 3 of the Proposed NPS-HPL specifically refers to highly productive soils being protected by avoiding *"uncoordinated urban expansion on highly productive land that has not been subject to a strategic planning process"*.

The Site was assessed through a strategic planning process (WDDS 2018) and the RRS as a preferred site for LLRZ development, and rejected for a change in zoning on the basis that it may be required for long term urban growth of Rangiora.
96. It is therefore considered that this submission to re-zone the Site is largely in accordance with the Proposed NPS-HPL.

National Planning Standards

97. The National Planning standards prescribe various matters under the RMA so that there is consistency among planning documents most relevantly here in terms of appellations for zones, and the standards applying to these zones.
98. The proposed rezoning adopts the standard zone appellation, in this case LLRZ as contained in the PWDP.
99. The PWDP identifies plan standards for minimum and average net site areas for the respective zones. These are modified for the proposed rezoning as a higher density LLRZ.
100. The higher density LLR zoning is entirely consistent with the NPS purpose for the LLRZ as reproduced below. In this case, the principal constraint to more intensive development is the peri-urban location where a lower density transition to the rural environment is appropriate (particularly noting that the zone boundary is 'mid block' so there is no natural or physical buffer between rural and residential areas); the existing pattern of 4 ha lots with existing substantial homes and gardens; and the fact that the premier large lot subdivision proposed relies on consistency of housing quality and character to be deliver on this vision for the area.

Large lot residential zone

Areas used predominantly for residential activities and buildings such as detached houses on lots larger than those of the Low density residential and General residential zones, and where there are particular landscape characteristics, physical limitations or other constraints to more intensive development.

Low density residential zone

Areas used predominantly for residential activities and buildings consistent with a suburban scale and subdivision pattern, such as one to two storey houses with yards and landscaping, and other compatible activities.[2]

Canterbury Regional Policy Statement 2013 (CRPS)

101. Chapter 6 of the RPS *"provides a resource management framework for the recovery of Greater Christchurch, to enable and support recovery and rebuilding, including restoration and enhancement, for the area through to 2028. Recovery in Greater Christchurch is also supported by the provisions in Chapter 5 notated as 'Entire Region'. The provisions in the remainder of the RPS also apply.3"*
102. An assessment of the proposed rezoning against the relevant CRPS Objectives and Policies is set out in **Appendix 1**. This should be read in the context of the CRPS being overdue for review and that it does not provide a regional response to the NPS-UD. The
need to focus on earthquake recovery has now passed and so many of the directive provisions need to be given appropriate 'weight' in a new national policy environment with a focus on flexible, responsive panning approaches that better provide for people's needs and well-being.
103. That assessment shows that

a) The development proposal achieves the objectives for the location, design and function of new developments (Objective 5.2.1)

b) The traffic effects of the proposal are unlikely to give rise to adverse effects and so achieves CRPS objectives for the strategic land transport network (Policy 5.3.7)

c) The Site falls outside the FDAs shown on Map A of Chapter 6 and in that regard is inconsistent with RPS Policy 6.2.1 clauses 1 to 3.

1. identifies priority areas for urban development within Greater Christchurch;

2. identifies Key Activity Centres which provide a focus for high quality, and, where appropriate, mixed-use development that incorporates the principles of good urban design;

3. avoids urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS

d) The environmental effects assessment outlined above establish that the proposed development is consistent and will not give rise to any concerns with respect to all the matters listed in RPS Policy 6.2.1 clauses 4. to 11. These matters are:

6.2.1 Recovery framework

Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that:

1. As above;

2. As above;

3. As above;

4. protects outstanding natural features and landscapes including those within the Port Hills from inappropriate subdivision, use and development;

5. protects and enhances indigenous biodiversity and public space;
6. maintains or improves the quantity and quality of water in groundwater aquifers and surface waterbodies, and quality of ambient air;
7. maintains the character and amenity of rural areas and settlements;
8. protects people from unacceptable risk from natural hazards and the effects of sea-level rise;
9. integrates strategic and other infrastructure and services with land use development;
10. achieves development that does not adversely affect the efficient operation, use, development, appropriate upgrade, and future planning of strategic infrastructure and freight hubs;
11. optimises use of existing infrastructure; and
12. N/A

e) The proposed rezoning achieves policies relating to:
- Sustainability;
- Integration of transport infrastructure and land use;
- Urban design; and
- Biodiversity, natural hazards, landscape, soils, contaminated land.

104. In terms of the CRPS polices for rural residential developments (Policy 6.3.9) the proposal sits square with all policy matters other than being a location identified in an adopted Rural Residential Strategy; and being at a higher density than provided for under this policy (ie greater than 1-2 hh/ha). As such it has a majority of features entirely consistent with the policy.
105. The CRPS includes housing capacity targets as below

6.2.1a Targets for sufficient, feasible development capacity for housing [inserted in accordance with sections 55(2) and 55(A) of the Resource Management Act 1991, from the National Policy Statement on Urban Development Capacity 2016]
For the period 2018-2048, sufficient, feasible development capacity for housing is enabled in Greater Christchurch in accordance with Table 6.1.
Table 6.1 Targets for housing development capacity in Greater Christchurch, 2018-2048

106. These derive from Our Space, under the requirements of the then NPS-Urban Development Capacity 2016, since replaced by the NPS-UD 2020. The targets (known as bottomlines in the NPS-UD) are to be treated as 'minimums' not 'maximums'.
Policy 6.3.12
enables urban development in the Rangiora and Kaiapoi FDAs (new Development Areas in the PWDP) where needed to meet the medium term targets. This a 'minimum' allocation approach contrary to the NPS-UD. The NPS-UD favours over allocation, including in locations unanticipated by RMA plans, where it will add additional development capacity, can be integrated with infrastructure planning and funding, and will contribute to well functioning urban environments – as is the case the proposed Lehmans LLR D2 zone.
107. The proposed Lehmans LLR D2 zone is consistent with the CRPS except with respect to those parts of the CRPS which are out of step with and do not give effect to the higher order plan, the NPS-UD.

Proposed Waimakariri District Plan
108. An assessment of this proposal against the relevant PWDP Objectives and Policies for urban growth and development as notified on 17 September 2021 is set out in **Appendix 2.**
109. That assessment shows that the proposed rezoning is entirely consistent with the relevant objectives and policies, including as sought to be amended by this submission. Those amendments are to UFD-P3 Identification/location and extension of Large Lot Residential Zone areas; and LLRZ-O1 and LLRZ- P1-5 and reflect the intent and outcomes intended for the proposed LLRZ D2 zone, which is a higher density LLRZ zone than the PWDP LLRZ zone (renamed LLRZ D1 in this submission).

ASSESSMENT AGAINST OTHER PLANNING DOCUMENTS
Our Space 2018-2048 Greater Christchurch Settlement Update (2019)
110. Our Space is a non-statutory document prepared under the Local Government Act. It
"responds to the new Government Policy Statement on Land Transport, which has increased funding for mass public transit schemes, and meets the requirement of the National Policy Statement on Urban Development Capacity (NPS-UDC) 2016 to prepare a
future development strategy…. Specifically, it:
• sets out how targets for housing for the next 30 years will be met, accommodating an additional 150,000 people;
• identifies locations for housing growth, encouraging Central City and suburban centre living while providing for township growth in Rolleston, Rangiora and Kaiapoi;…

• *promotes a compact urban form, which provides for efficient transport and locates development in a manner that takes into account climate change and sea level rise.[4].*

..Underpinning this settlement pattern approach is the vision for a transformation of the transport network that fosters much greater public and active transport usage, and reduced reliance on the private vehicle.

111. Our Space acknowledges that this will require commitment from the Government to invest in the necessary improvements to our transport system, which could include investing in rapid transit services. To date, there has been no successful business case for improved public transportation, including not as a Covid 19 fast track infrastructure project.

112. The Our Space housing capacity targets (Table 3) and Future Development Areas are related to growth of urban areas.

113. Our Space, like the CRPS (and the Operative District Plan) are now out of date, as they do not reflect or give effect to the new requirements of the NPS-UD.

Waimakariri 2048 District Development Strategy (WDDS)

114. The preferred growth directions for Rangiora in the WDDS 2048 (2018) are outlined above (under 'Site') i.e. westwards to Lehmans Road, and otherwise eastwards. However, the Council in its decision on the RRS, recognized west of Lehmmans Road as a potential longer town urban growth area.

115. The WDDS Rangiora Snapshot (pp38-39) -when looking ahead to 2048 proposed that:

a) Rangiora remains the District's largest town
b) 30,000 – estimated population (2048)
c) 12,025 – estimated households
d) 5,025 - new households in Rangiora
e) Continues to accommodate one third of the District's residential growth
f) 167 – estimated annual building consents for new dwellings for the next 30 years
g) 423 hectares of additional feasible residential land required by 2048 (this includes capacity in remaining stages of existing residential developments as well as new greenfield areas inside and outside of the Infrastructure Boundary)
h) Future residential growth directions proposed to the east (predominantly) and west of the current town
i) Opportunities for intensification/regeneration to be identified
j) New growth directions take into account areas of unacceptable natural hazard risk and areas of significant environmental and cultural values
k) New growth areas to connect into existing sewer and water networks
l) Stormwater Levels of Service designed to meet increased performance requirements

116. At the 2018 Census Rangiora had a population of 17,841, and 7314 total dwellings (incl those unoccupied and under construction). Population projections for the District show an average annual change 2018-2020 of 1700 persons. If Rangiora continues to attract a third of all district growth as stated in the WDSS then Rangiora's population in 2021 will be around 18,900.

Mahaanui Iwi Management Plan

117. Part 1 of the PWDP in a section "Mana Whenua" sets out the position with respect to iwi and the review of the district Plan:

a) The District's territorial area sits within the takiwā (territory) of Ngāi Tūāhuriri which is one of eighteen Ngāi Tahu regional papatipu rūnanga, constituted under the ***Te Rūnanga o Ngāi Tahu Act 1996*** *to represent* ***mana whenua*** *interests.*

b) The preparation and change of a district plan must take into account relevant iwi documents. For the District, Ngāi Tahu has set out its resource management values, issues, objectives and policies within the Mahaanui Iwi Management Plan (2013).

c) The Mahaanui Iwi Management Plan identifies objectives, issues and policies for natural resource and environmental management for six pāpatipu rūnanga (including Te Ngāi Tūāhuriri Rūnanga). It seeks to ensure that the taonga and resources of Ngāi

Tahu mana whenua are recognised and protected in the decision-making of statutory agencies. The Mahaanui Iwi Management Plan contains a comprehensive suite of policies and objectives addressing the range of resource management matters of significance to tangata whenua. The District Council shall have regard to the Mahaanui Iwi Management Plan when preparing or changing the District Plan, to the extent its content has a bearing on resource management issues of the District.

118. The Mahaanui Iwi Management Plan (MIMP) 2013 was released on 1 March 2013.

119. The MIMP is a tool for tangata whenua to express their identity as manawhenua and their objectives as kaitiaki, to protect their taonga and resources, and their relationships with these. The MIMP seeks to ensure that these taonga and resources are recognised and protected in the decision-making of agencies with statutory responsibilities to tangata whenua. Importantly it is also a tool

that assists Papatipu Rūnanga representatives to articulate their values, issues and policy into statutory processes.
120. The MIMP includes both general objectives and policies about the management of land, air, and water, and also includes catchment specific objectives and policies.
121. Section 5.3 Wai Maori (pp77-98) contains an extensive discussion about tangata whenua rights and interests in freshwater. It provides a suite of Issues, Objectives and Policies for freshwater
122. Section 5.4 Papatuanuku (pp101-124) sets out the Ngai Tahu Subdivision and Development Guidelines that are to be read along-side objectives relating to:

a) Land use planning and management in the takiwā reflects the principle of Ki Uta Ki Tai. (from the mountains to the sea)

b) Rural and urban land use occurs in a manner that is consistent with land capability, the assimilative capacity of catchments and the limits and availability of water resources.

c) Inappropriate land use practices that have a significant and unacceptable effect on water quality and quantity are discontinued.

d) Ngāi Tahu has a prominent and influential role in urban planning and development.

e) Subdivision and development activities implement low impact, innovative and sustainable solutions to water, stormwater, waste and energy issues.

123. Section 5.5 Tane (pp127-137) includes objectives that focus on:
a) Regional policy, planning and decision making in the takiwā reflects the particular interest of Ngāi Tahu in indigenous biodiversity protection, and the importance of mahinga kai to Ngāi Tahu culture and traditions.
b) The customary right of Ngāi Tahu to engage in mahinga kai activity is recognised, protected and enhanced…
c) Customary use, and therefore mahinga kai, is given effect to as a first order priority for freshwater management in the takiwā.
124. Section 6.4 (pp213-224) addresses issues of particular significance to the lands and waters of the Waimakariri catchment within which the Site lies.
125. Relevant Objectives relating to urban development of land in that catchment include:

a) The natural "energy, vitality and life" of the Waimakariri River as a braided river is protected and restored.

b) The discharge of contaminants to the Waimakariri and its tributaries is eliminated.

c) Water quality and flows in the Waimakariri and its tributaries are improved to enable whānau and the wider community to have places they can go to swim and fish.

d) The mauri and mahinga kai values of the Waimakariri and its tributaries and associated springs, wetlands and lagoons are protected and restored; mō tātou, ā, mō kā uri ā muri ake nei.

126. A key issue relating to subdivision and development is that subdivision and development activities in the lower catchment have the potential to adversely affect Ngāi Tahu values such as waterways, mahinga kai and sites of significance (Issue Wai4).
127. The proposal provides for full urban reticulation of the three waters and is consistent with the objectives and policies contained in Chapters 5.3 and 5.4 of the MIMP. The proposal does not preclude individual land owners from installing rainwater collection and use from roof areas at the time of building development.
128. The proposal has been designed taking into consideration the potential effect of resultant subdivision and development on the rivers and streams that flow into the lowland rivers.
129. Overall it is considered that the proposal will not have adverse impact on the cultural values of iwi as set out within the MIMP.

SECTION 32 ASSESSMENT

130. A Section 32 assessment is contained in **Appendix 3.**
131. In summary, the PWDP zoning and associated rules (RLZ Zone with a minimum lot size for subdivision and a dwelling 4ha) do not meet the needs and aspirations of the current owners.
132. Strategic Council planning documents (specifically the WDDS) have a focus on only meeting urban growth demands within urban environments of existing towns. They favour intensification (15hh/ha) and a strict allocation of capacity by development areas. It is a control and command regime consistent with Map A of Chapter 6 of the CRPS but is out of step with the requirements of the NPS-UD which requires a more flexible, responsive approach, prohibits a hard fixed unmoveable urban/rural boundary.
133. This approach leaves little room for new proposals or proposals that do not sit square with the standard array of GRZ/medium density or SETZ (Settlement Zone). SETZ applies to some of the District's smaller settlements outside Greater Christchurch.
134. Neither LRZ nor Large Lot Residential (LLRZ) as notified in the PWDP is an efficient use of this block of land located as it is immediately adjoining the urban area of Rangiora, and in a location easily accessible to the town centre by active transport modes as well as car and several district reserves.
135. If this Site is not zoned for LLRZ D2 (minimum average lot size 1500m^2) use to enable residential re-development then it will drive pressure to re-zone elsewhere. That step potentially will not have the significant benefits to Rangiora long term in relation to enabling a well-functioning urban environment that enables people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future. Additionally re-zoning to LLRZ D2 will contribute to providing additional development capacity to meet the different needs of people and communities in a planned manner and

consistent with the NPS-UD.
136. The Site can readily be developed to reflect the principles of the Urban Design Protocol with values of character, context, and connectivity.
137. The Section 32 assessment concludes that the proposal to re-zone the Site from LRZ zone to LLRZ D2 Zone (average lot size 1500m$_2$) is the most appropriate method for achieving the objectives of the proposal, than the other alternatives considered.
138. Option 2 identified in the s 32 assessment is consistent with some PWDP policies notwithstanding that it does sit square with the strategic intentions signaled in the WDDS and the PWDP approach to providing for development capacity and urban development.
139. Option 2 identified in the s 32 assessment to re-zone the Site is the most appropriate given:

a) The proposals adopt the PWDP zones, development and activity standards with appropriate amendments. This ensures continuity of the District Plan anticipated environmental outcomes and urban amenity for Rangiora and adjoining residential areas;

b) Will be consistent with and give effect to many of the relevant PWDP objectives and policies;

c) It is a logical extension to the developed and developing residential land adjoining the Site while achieving a compact, efficient urban form that removes pressure on isolated rural land elsewhere around Rangiora.

d) It gives effect to the NPS-UD, specifically Objective 6 c) and Policy 8, delivering significant additional development capacity and contributing to a well functioning urban environment.

e) It is assumed that there will be capacity in the public utilities and the existing road network, including planned upgrades, to accommodate the traffic effects of the redevelopment;

f) The proposed Site specific ODP will provide certainty of the final form and disposition of the re-zoned area including its proposals for reserves, roading, future linkages for pedestrian and vehicular traffic.

140. The re-zoning proposal is considered to be appropriate to achieve the sustainable growth and development of Rangiora.
141. The economic, social and environmental benefits of the proposed rezoning outweigh any potential costs.
142. The overall efficiency and effectiveness of the proposed rezoning (Option 2) is high, in comparison to the alternative options set out in the s 32 Assessment which are low (Options One and Four) or low to moderate (Option Three).
143. The PWDP proposes to release land for development in the new Development Areas at Rangiora and Kaiaipoi through a novel and untested certification process that is not clearly derived from RMA statutory powers, nor Local Government Act 2002 (LGA) authority. This approach is not proposed for the LLR Overlay areas. As the proposed Lehmans Road LLR D2 zone proposed by this submission seeks large lot urban densities, it is anticipated that Council may favour the certification process if it accepts the proposed rezoning. This is opposed – rezoning to LLRZ D2 is sought.
144. Potential difficulties with the proposed certification process are identified and discussed in the Section 32 Assessment. (**Appendix 3)**. In summary, the process is hugely discretionary, does not provide conventional rights to an applicant (eg right of objection/appeal) meaning decisions cannot be challenged, and it is not apparent that the process will be appropriately documented with a transparent record of the decision-making within the certification process. Further uncertainty arises in the practicalities of how to negotiate and manage the staging, funding and building of key infrastructure across a range of Sites, and a risk that land supply is controlled by a limited number of large developers. It is a far less efficient and effective method for delivering land for housing than the Council rezoning the land in the PWDP.
145. The proposed rezoning is considered to be the most appropriate, efficient and effective means of achieving the purpose of the RMA.

CONSULTATION

146. The landowners and their consultants have submitted on the WRRS and the WDDS (**Appendix 4)**.
147. The submissions to re-zone as rural residential or identify the Site as suitable for LLRZ have been rejected as noted above. LLRZ but at higher densities as now proposed is considered to be a more efficient use of the land and better meets market demand. 5000m^2 sites provide more land is needed for a spacious home and garden.
148. The landowners have been consistent in their wish to find a zone and possible land uses better suited to their needs.

CONCLUSION

173 The submission seeks to rezone 58 ha of land adjoining Rangiora from Lifestyle Rural Zone (LRZ) to Large Lot Residential with a specific density standard (LLRZ D1), minimum average lot size 1500m^2.
149. The Site has a long history of rural lifestyle use. It is not significantly restricted by potential natural hazards especially flooding, nor does it have physical limitations for development for residential purposes as it is not liquefaction prone, and has no known geotechnical limitations but does contain an area of LUC 2 soils. It is near a site of significance to iwi (SASM – 025) being the Rakahuri/Ashley River The Site has access to a collector road and is near to a strategic road giving direct access to the town centre and a range of community amenities and facilities.
150. The Site immediately adjoins the urban area of Rangiora, and is well located to join in to Council utility services. It is well suited for conversion to residential use.
151. The Site is not identified within the westward growth direction for Rangiora in the District Development Strategy 2018 nor is

it part of the DEV-WR development area which adopts Lehmans Road as its western boundary. It is in a location that achieves coherent and compact urban form offering ease of access to business services, community facilities, reserves and the primary road network.
152. The proposed rezoning provides for a connected and high amenity residential living environment not presently available under the PWDP while avoiding and/or mitigating any potential adverse effects on the environment. It will provide for continuing high demand for a variety of high quality residential sections aimed at a particular segment of the housing market in an ideal location, easily accessible to the existing town centre services and facilities. It will broaden the range of housing available. As such, it is consistent with the NPS-UD including Objective 6c) and Policy 8, to be responsive to proposals which supply significant development capacity and contribute to a well functioning urban environment.
153. The use of this Site for residential purposes can be a sustainable and efficient use of land and infrastructure. The proposed rezoning better provides for the social, economic, environmental well-being of the landowners and the Rangiora community than continuation of the current low intensity lifestyle land use on 4ha blocks, or a conventional LLRZ residential use.
154. Any potential adverse effects of the implementation of the proposed rezoning can be assessed at subdivision stage but there has been no restriction on servicing the blocks to date. Capacity will need to be confirmed for infrastructure, power and road network. Any future subdivision of the Site will need to confirm water supply and wastewater treatment and disposal options.
155. Rezoning of the site to LLRZ zone is not inconsistent with the policies and objectives of the PWDP, but it is at odds with the dated CRPS approach to provision of urban growth and housing capacity for Greater Christchurch, to the extent that it is not within an FDA created by Change 1 to the CRPS and is not identified as an LLRZ site under the strategic RRS prepared by the Council.
156. As the proposal helps achieve the purpose of the RMA, and has been shown to be consistent with the relevant provisions of the NPS-UD, the submission can be accepted by Waimakariri District Council.

Original Submission

Summary Reasons for the Submission

The reasons for our submission are outlined below.
a) The preferred relief (**the proposed rezoning**) is both appropriate and necessary to achieve sustainable growth and development of Rangiora and the District and meet the requirements of the National Policy Statement for Urban Development 2020 (**NPS-UD**).
b) The Site identified in Figure 1 and at para 1 of the Preferred Relief above is a logical and preferred location that lends itself to a specific type of housing development not provided within the PWDP as a residential option adjoining but outside the existing urban areas. Nowhere is it possible to develop in a comprehensive, coordinated way a low density, high quality residential environment in the District's towns, the Rural Lifestyle Zone or Settlement Zone as a permitted activity.
c) The requirement for 12/15 hh/ha in GRZ zones (the majority of land in urban areas) drives development to modern scale relatively small urban lots best produced as a package across a significant land holding. The GRZ subdivision standards do not provide for the needs of people who seek a generous sized urban lot residential setting. This is a housing sector that is running against the planning tide of intensification but is, nonetheless, a legitimate form of housing in an appropriate setting. The barriers to such development in urban areas requires an appropriate setting/ location in the rural areas but close to or adjoining the urban areas and at a much lower density than is desired or appropriate (the PWDP LLRZ) to meet the housing needs for generous sized urban lot residential living..
d) The PWDP subdivision standards for LLRZ require lots that are very large for those whose primary interest in a rural setting is a form of residential living, not one that requires significant maintenance and management often involving animals or machinery at scale. Conversely, the GRZ subdivision standards do not provide for the needs of people who seek a large lot residential setting
e) The focus in the PWDP is on prescribing a limited range of residential options and tightly controlling and constraining housing choice within those options. Further urban growth is also tightly constrained and controlled around DEV areas around Rangiora and Kaiapoi but for a very specific form of residential development driven off density requirements that do not match the needs of all landowners.
f) The focus in most new District Plans, driven in part by the National Planning standards, is to simplify the range of zones, to standardize lot sizes, to supposedly create efficiency and certainty through ease of administration of the District Plans. This is done by constraining housing and land development choices by lot size, by location, by built standards and the disposition of built/open elements in a site. However, the National Planning standards do provide for large lot urban residential living, a residential living option which has not been taken up the PWDP (due most likely to the restrictive provisions of the CRPS which only prescribe one from of lower density residential living, at a density of 1-2 hh/ha).
g) This planning approach may be a standard approach to resource allocation but it does not provide a flexible, responsive

approach to innovative and new development options. The Government is creating policy settings that on one hand seek intensification in urban areas, while at the same time pushing away from a land allocation model of planning. The PWDP in striving to face both policy directions has a package of measures that are in fact a major barrier in terms or cost, timeframes and certainties for proposals that are not cut from the suite of housing and development options set out by the PWDP. The allocation of land in preferred development areas, it must be said, runs counter to the Government's push, and now its direction, to free up land for development, to encourage innovation in housing (presently with a focus of intensification) and to make available a range of responses to the need to meet the housing needs of people and communities set out in the NPS-UD.

h) While the weight of demand (and the planning response) is around affordable housing, around small lots and dense development that supports investment in public facilities and amenities such as public and active transport, reserves, and commercial services, there is always a wide spectrum of preferences at play in the housing market. The demand for high quality, generous houses set on generous sized parcels of land within high amenity settings is an important and no less relevant housing sector. There is a strong unmet demand, as confirmed by advice from Bayleys real estate (**Appendix 5**) for larger family homes with room for a pool or similar. Purchasers want to be close the amenities of Rangiora and within walking and cycling distance of local schools. They do not want the only available options – a 4 ha lifestyle block or 5000m^2 rural residential site at Mandeville or Ohoka.

i) Interestingly enough for a nation built on the so-called quarter acre paradise, recent policy and planning interest in housing and land development has now seemingly positioned the 1011m^2 section as a luxury item, as the antithesis of providing for community well-being and needs. It is as though the old quarter acre of itself acts against building a sense of community despite being able to be developed in a planned, structured, coordinated or integrated manner. Rather than being a frivolous discretionary item in land development
and housing choice, a well-planned, well located and properly serviced low density residential environment has much to offer urban environments. They can be tactically used to provide shape and edge to urban areas, they can provide a mass of amenity different from (and potentially complementary to), but no less legitimate in urban outcome terms, to conventional GRZ zoned land.

j) In many ways the approach of a district plan to the role and place of the old quarter acre is not dissimilar to the issues faced by comprehensive retirement villages when first proposed. The idea of dense, almost gated and self-contained communities, with multi storey buildings also did not sit well in many district plans. But now they are accepted as an important part of the urban fabric catering to a specific demographic and health demographic. Most plans enable them.

k) Provision for low density residential in an urban setting, or failing that likelihood, in an adjoining rural zone is a fundamental gap in the district plan.

l) The submission seeks to provide for another housing typology not provided in the PWDP and in a location with significant planning merit. The planning case was made out in a detailed submission to the proposed Rural Residential Strategy (**RRS**) for the land identified in this submission to be "reserved" for conventional Rural Residential zoning in the review of the District Plan. That submission was rejected in favour of a decision ascribing an unspecific strategic significance to Lehmans Road as the urban boundary; simply the decision was that rural residential development here would preclude this area as a future urban growth path, even though this was likely to be very long term as the Waimakariri District Development Strategy (WDDS 2018) for the period up to 2048, does not favour urban growth west of Lehmans Road.

Officer Recommendation

Continue to exclude the area west of Lehmans Road and the racecourse land at Rangiora as growth areas as these were originally considered but not included in the draft RRDS as they trigger the key preliminary criteria of: being on the direct edges of a main town outside of the Projected Infrastructure Boundary (PIB) thereby foreclosing more intensive long-term urban development, and…

Panel Recommendation

The panel accepted the officer recommendations to exclude areas on the fringes of Rangiora in the final RRDS due to these having the potential to foreclose more intensive long-term urban development of the town.

m) In light of the above decision on the Waimakariri Rural Residential Strategy, the proposal now is for a form of high amenity low density urban zoning, which whilst in demand is entirely absent from the PWDP. This will be a long term urban form of development. The proposal set out in the submission will achieve a compact, and efficient, urban form on the edge of Rangiora with excellent connectivity by multiple transport modes. It provides for continuous urban development by enabling a built form which can act as a strong zone or urban boundary.

n) The proposed rezoning will accommodate approximately 311 LLRZ lots1 at the proposed amended density standards for LLRZ D2 (average size 1500m^2). It will contribute to a well-functioning urban environment, meeting the NPS-UD Objective 6(c).

o) Any adverse effects on the environment arising from the proposed rezoning will be minimal, if any, and can be adequately mitigated. A high amenity master planned development is proposed.

p) Significant positive effects arise from the proposed rezoning. It will enable the short term housing demand at Rangiora to be met, and can deliver a housing typology for which there is demand, on lots that are not a burden to the landowners (which is the case for 4ha and the very limited areas of LLRZ D1 with a density of 1-2 hh/ha) and for which there is no provision in the PWDP. At present rates of land uptake there is about 4 years vacant land supply in Rangiora. Given it takes 3-5 years to bring land from zoned state to on the market as developed lots, there is some urgency in providing additional capacity. This proposal helps address an anticipated shortfall in residential zoned plan enabled land.
q) There is no additional cost to the Council in re-zoning the Site as there is expected to be capacity in the public utilities and the existing road network, including planned upgrades.
r) Amendments to PWDP objectives and policies may be necessary to provide for a higher density LLRZ, but of themselves will not act against those relating to Strategic Directions Urban Form and Development and Urban Growth. The PWDP approach to zones and
identification of future development land is already out of step with higher order Resource Management Act 1991 (RMA) statutory documents because they do not give effect to the NPS-UD (and are sought to be amended through this submission).
s) The alternatives of retaining Rural Lifestyle or Large Lot Residential zone across the entire Site are not an efficient use of land which immediately adjoins the urban area of Rangiora, and is highly accessible to the town centre by active transport modes as well as car.
t) The proposed rezoning is consistent with and the most appropriate, efficient and effective means of achieving the purpose of the RMA.

The Site
1. The Site is a 58ha block of land ('the Site') accessed from Lehman Road, Rangiora **(Figure 1)**. It is owned by the two submitters and 12 other landowners.

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1 Assumes 20% of land area taken for servicing including roading, reserves and stormwater management if required.

Figure 1: The site (outlined in blue (Google Earth)

2. The Site is surrounded by RLZ land that is used for a mix of lifestyle and conventional farming. To the NE is the Rangiora Eco Holiday Park, and beyond the Park is the Rangiora Racecourse about 300m away from the nearest lot and 1km from the centre of the Site. Land to the south east is GRZ and part of urban Rangiora with newly developing residential land west of West Belt. About 1.9 km to the NW is Rangiora Airfield. About 1km north of the most northern lot is the Ashley River.
3. The southern-most lot in the proposal with the Rangiora Vet Clinic faces, but does not have access to Rangiora-Oxford Road (State Highway 72). This arterial road provides the main road connection in to the centre of the town. The well-established Fernside Rural residential area is about 2.5km west from the junction of Lehmans and Rangiora-Oxford Roads.

Figure 2: the site is a broader context (Site marked red)

4. The Site is not identified as lying within a preferred growth direction for Rangiora in the Waimakariri 2048 District Development Strategy (2018) (**WDDS**) **(Figure 3)**. No land west of Lehmans Road is included in the West Rangiora Development Area (**DEV-WR**) in the PWDP.

Figure 3: Figure 11 WDDS

5. The Council reviewed its strategic approach to the location and provision of Rural Residential land (now zoned LLRZ in the PWDP) in the WDSS. It adopted the position that it would:
a) Explore tools such as cluster development to manage rural character
b) For rural residential development, adopt an approach that has a primary focus on creating new rural residential areas, with a secondary focus on enabling large lot intensification within existing rural residential areas where there is sufficient community support and servicing available
c) Review the Rural Residential Development Plan for the whole District (pg 21 WDDS).

6. Rangiora grew by a population of 17,241 (2018 Census). It grew by [illegible] between 2006 and 2018. Growth of Rangiora

6. Rangiora presently has a population of 17,841 (2018 Census). It grew steadily between 2006 and 2018. Growth of Rangiora since then has continued in step with the district growth which has increased 8.2% between 2018 and 2021 from 61,300 to 66,300 at an annual average of 2.8% from 2018 to 2020 (Statistics NZ Subnational population projections at 30 June 2021: provisional).

2006 (count)	2013 (count)	2018 (count)
12,165	15,069	17,841

Statistics NZ

Population projections at 30 June

PLANNING STATUS OF THE SITE
Chapter 6 of the Canterbury Regional Policy Statement
7. An assessment of the CRPS is set out in **Appendix 1** to this submission.
8. The Site is within the Greater Christchurch area.
9. It was not shown as a Greenfield Priority Area – Residential (GPA) on Map A of the Canterbury Regional Policy Statement (CRPS). The GPA terminates at Lehmans Road.
10. As a result of the Minister for the Environment's decision of 28 May 2021 on Change 1 to Chapter 6, an area largely south of Oxford Road and a finger of land to the north of Oxford Road was included as a Future Development Area (**FDA**) (**Figure 4** orange).

Figure 4: Map A Chapter 6 Regional Policy Statement Greenfield Priority areas
Site location identified with red circle (appx)

11. The FDAs are intended to accommodate the increased demand for new dwellings in that part of Waimakariri District within the Greater Christchurch Urban Area and to respond to the NPS-UD. They do not provide "plan enabled" land as they need to negotiate a rezoning process to confirm their status as land developable for housing and other urban purposes.
12. The proposal for a LLRZ zone with average lot sizes of 1500m2 is inconsistent with the policy approach of Chapter 6 for Greater Christchurch, in that if fits none of the residential living typologies provided for in Chapter 6 and is not in a location identified for urban or rural residential development. It sits 'between' the urban and rural residential densities provided for in the CRPS (minimum 10 hh/ha for urban in Waimakariri, and average 1-2 hh/ha for rural residential). The proposed density is appx. 6.66 hh/ha.
13. Notwithstanding, the proposal meets all the location and other criteria in CRPS Policy 6.3.9 for rural residential development. It is:
- Outside the CIAL noise contours
- Has some sites with restrictions from the take-off and landing vectors for Rangiora Airfield but not such as to impact its operational capacity.
- Is outside the groundwater protection zone
- Is not within the Waimakariri stop bank system
- Has no views of or to the Port Hills
- Has good access for emergency services
- Will not create reverse sensitivity issues with adjoining land uses; Rangiora Racecourse is 500m away.
- Free of significant natural hazards and is a flat site.
- Supports no significant natural values or ecological values.

• Contains no SASMs.
• Can be integrated into or consolidated with the existing urban area of west Rangiora.
• Contains no surface water bodies so there will be no adverse impacts on these.
• The development will be contingent on an ODP to provide integrated design for subdivision and land use, and provide for the long-term maintenance of a high quality high density rural residential character.
• The proposal is not intended as a staged development towards full urban; rather it is intended to provide a unique residential environment that can stand alone and contribute to the urban fabric of Rangiora like Palmview in east Rangiora, or as Kaiapoi Lakes does for Kaiapoi.

14. Overall, the proposal is not consistent with Chapter 6 but that is more a function of its original purpose when formulated in 2013. Notwithstanding that, the submission for a lower density residential focussed, high quality urban environment that attaches to an existing urban area and that promotes a coordinated pattern of development has planning merit.

Operative Waimakariri District Plan

15. The Site is zoned Rural in the Operative Plan. The minimum lot size for subdivision and a dwelling is 4 ha.

Proposed Waimakariri District Plan

16. The Site is zoned Rural Lifestyle Zone **(LRZ) (Figure 4).** The minimum lot size for subdivision and a dwelling in the LRZ is 4 ha.
17. Oxford Road is a strategic road and Lehmans Road is a collector road.

Figure 5: Proposed District Plan Zoning (site outlined in red)

18. The Site is also subject to, or potentially influenced by, a number of Overlays:
a) Rangiora Airfield Take Off Climb and Approach Obstacle Limitation Surface (**Figure 6**)
b) National Grid Transmission Lines (**Figure 6**)
c) Liquefaction: Liquefaction damage is unlikely (**Figure 6**)
d) Non-Urban Flood Assessment Area (**Figure 7**)
e) Geographic areas: Ecological Area – Plains
f) Ecological District – Low Plains

Figure 6: Rangiora Airfield Take-off and Approach vectors (blue dashed lines); Liquefaction damage unlikely (green)Transmission lines (green lines); Site outlined in red

Figure 7: Non-urban flood assessment & Waimakariri Flood Hazard maps
Blue – medium risk, green – low risk, white – very low

DEVELOPMENT PROPOSAL AND PROPOSED REZONING

19. Subdivision of the Site will create approximately 311 LLRZ D2 lots.
20. The key design drivers for the proposal are:
a) A high amenity premier residential zone with large houses on large sites – average 1500m^2, min 1000m$_2$ based on the St Kilda, Hamilton development concept (**Figure 8**).
b) LLRZ D2 standards would enable a lower density zone in the medium term e.g. 10 years to achieve a high quality consistent character subdivision. If developed as an integrated development subject to an ODP subdivision can be staged for to the proposal.
c) Creating strong connections with the immediate neighbourhood by providing a cohesive interconnected roading layout that picks up direct links to the eastern neighbourhood off Lehmans Road and the northern subdivision roading, and carries them into the Site.
d) Creating a high amenity and diverse residential neighbourhood by providing interfaces to roads, reserves and rural environments.
e) Respecting and building on local identity and character of Rangiora by retaining specific vegetation features from the Site, and anchoring the development into the wider landscape.

21. A development concept can provide for sound urban design by:
a) A hierarchy of movement corridors.
b) Prioritisation of walking and cycling.
c) A north-south alignment of street blocks to maximize solar access and provide for efficient use of lots.

d) Block perimeters being kept as small as practicable to aid permeability and higher public amenity.
e) Enabling a range of housing typologies set in high quality landscape and street setting with generous amenity plantings and curtilage.

Figure 8: St Kilda development images (Bayleys)

22. St Kilda, Cambridge is a premier development on the outskirts of Cambridge, centrally located and with easy access to the Waikato Expressway. It was originally part of a small dairy operation which was dissected by the Waikato Expressway, leaving a portion within the Cambridge Town boundary and the larger balance of the property of approximately 80 ha (which became St Kilda) on the Eastern side of the Expressway, left in the Rural Zone.
23. The initial development concepts were for a Rural Residential type development given the Expressway separation of the existing residential development on the Western side of the Cambridge Bypass, however this was not supported by Council and a new concept of larger residential sections of a 1600m² average size was developed and approved – see https://www.stkilda.nz/page/location/

EFFECTS ON THE ENVIRONMENT

Township growth and urban form

24. The Site immediately adjoins the western edge of urban Rangiora.
25. The WDDS indicated a general preference for the direction of urban growth of Rangiora to the east as a way of balancing up the residential areas around the town centre and some growth to the west.
26. The approach of the WDDS was to signal growth options to be confirmed in the District Plan Review:
The broad directions for greenfield residential growth for the District's main towns are set out in Figures 11 to 14. Further work will be carried out to identify and confirm the exact locations and extent of these residential growth areas, together with the intensification opportunities within existing urban areas. These will be enabled through the District Plan Review and other planning tools.
27. The Strategic Planning documents clearly signal active consideration of growth needs and growth directions. The options available to the Council were constrained by the approach of the CRPS as the District Plan has to give effect to the CRPS and cannot be
inconsistent with it. The CRPS took effect in 2013 and is overdue for review.
28. The CRPS tightly holds urban growth to the constraints of Map A Chapter 6 and the identified FDAs which although amended by Plan Change 1 in 2020 does not respond to the directions of the NPS-UD. In any event the approach is focused on the need for housing in full urban residential land, less on other residential development forms.
29. As such the Site falls outside the planning policy framework for urban growth. However, in terms of urban form and on the ground, there is considerable merit and logic to conversion of this existing LRZ land to a new high amenity residential form that can be integrated into the Rangiora urban fabric.
30. The proposal has the potential to anticipate the longer term growth path confirmed by the decisions on the RRS to protect the future growth option of more intensive urban development in this direction. It can set a pathway to further westward expansion on land
that holds few if any physical barriers to land development.
31. The proposal will contribute to the housing needs of Rangiora and in a form and location that does not undermine the long run urban form of Rangiora. Planned growth confirmed in the PWDP is already intended to extend westwards out to Lehmans Road and to keep the town edge squared up providing depth to future development and providing a rational basis for providing movement networks driven off the key roads such as Rangiora-Oxford Roads. The West Rangiora Future Development Area confirms this approach. The Site sits in the next block west of Lehmans Road so is not proposing a disjointed urban form, nor one that is not part of the long term thinking of urban form and growth for Rangiora.

32. A full residential zoning is proposed under LLRZ D2 and will provide a high quality street character, overall amenity and passive surveillance over the street, and will create the correct lighting standards, roading standard, fully formed footpaths and cycleways required for a high quality urban environment.

Neighbourhood and wider community effects

33. The Site is serviced by a collector road and is close to an arterial road. This provides for ease of access and safe and convenient movement to and from the Site. A planned development co-ordinated by an ODP can facilitate within the site

movement corridors and linkages through the Site to provide for walking and cycling.
34. A key positive neighbourhood and community effect will arise from the existing dwellings and their established gardens and plantings that will anchor new development and provide a point of reference for new dwellings. Development will not be on a bare site; it will take place in an existing established part-residential setting. The transition to a low density, high quality premier residential development will start from a favourable position and minimise the apparent extent and nature of the landscape change.
35. The Site is comparatively large (58.4 ha) and has the potential to support a variety of residential building typologies and this will contribute to a mix of households within the development and provide built form variety and interest in the streetscape. Whilst LLR D2 standards are proposed, it may be that part of the Site is suitable for other higher density forms of development, which would be within scope of the alternative relief, and could be considered as part of the master planning process required for preparation of an ODP (ahead of the hearing). The earlier stages of the St Kilda development were for large lot residential, with more clusters of townhouses included as later stages (and a retirement village). A retirement village is unlikely in this case, given the proximity of the Charles Upham Retirement Village.
36. Rangiora is well-positioned to accommodate and service the needs of a fast-growing resident population that will in turn support more business activity, schools, community facilities and community organisations.

Effects on tangata whenua values
37. The Proposed District Plan does not identify any Sites and Areas of Significance to Maori in the Site, but the nearby Rakahuri/Ashely River identified as SASM-025. This has been scheduled as being
River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species
38. The PWDP has Policy SASM-P8 which is relevant to pre-development processes:
Engagement with rūnanga
Te Ngāi Tūāhuriri Rūnanga and the District Council to encourage engagement with the Rūnanga priorto persons undertaking activities and/or applying for resource consent where the activity has thepotential to adversely affect identified sites or areas of Ngāi Tūāhuriri cultural significance. Where priorengagement with Te Ngāi Tūāhuriri Rūnanga h as not been undertaken by an applicant for an activitythat has the potential to adversely affect an identified site, the District Council will consult with the Rūnanga.
39. The Site is not listed as an archaeological site on the NZ Archaeological Site database.

Landscape and visual effects
40. Rural Lifestyle style development exists on the Site now (a series of 4 ha lots with a dwelling and associated accessory buildings on each). The landscape is dominated by shelter belts, utility buildings, significant trees and planted curtilages around dwellings many of which are well set back off the roads down RoWs.
41. An ODP will help to achieve an integrated, cohesive and coherent development The proposal will lead to a modification of the landscape of the Site from a predominantly lifestyle block landscape to a denser semi-urban environment dominated by residential building that will, in time, get the benefit of street tree and reserve plantings and landscape treatments around the houses.
42. The visual effects which will arise from a change in the number of vegetative and built elements in the landscape are significant, but not avoidable, if the Site is to contribute to the on-going growth of Rangiora. The change will contribute to a high quality amenity and quality of environment and one that will be entirely consistent with and supportive of the rural lifestyle residential development that has successfully established on the Site.

Well-functioning urban environments
43. The Site adjoins the existing built up urban area of Rangiora. Immediately to the east are existing or developing residential areas.
44. The conversion of the Site from present rural lifestyle uses to low density, high quality residential will continue a pattern of outward expansion of Rangiora. Such a change may not be consistent with the PWDP's identification of a Future Development Overlay for west Rangiora only as far west as Lehmans Road, but on the ground it will look and integrate as part of the urban fabric.
45. It will provide some replacement lower density living areas for the existing LLR zones at north west Rangiora – but at much more appropriate higher density that the LLR D1 standard which is 1-2 hh/ha. There are two such areas, shown on the planning maps below. River Road has an 'urban overlay' and is intended to be intensified to urban densities. The land on the opposite (east) side of Lehmans Road is a 'legacy' rural residential zoning which applies under the Operative District Plan. The landowners have developed the adjoining residential subdivision and wish to develop the land for full urban residential development. Services are in place to support this. The constraint to date has been Map A of the CRPS which does not include the land as a Greenfield Priority Area or Future Development Area, GR zoning of this land is consistent with the NPS-UD.

Figure 9: PWDP as notified – LLRZs shown in light grey. Diagonal stripes – urban growth overlay.
Site outlined in red.

46. Rangiora is growing apace. It is attracting significant interest from new home buyers as people respond to the significant investment in upgraded transport links (Northern Corridor and public transport) and a growing economic base for employment within the District and the City.

47. Rangiora has excellent connectivity to the City, both via the new Northern Corridor, and a nascent cycleway link into the City. There is a very regular bus service every half hour.(the No 1 Blue Line) The standard trip takes 70 minutes, and there is a twice daily weekday morning express service from Rangiora, and seven times weekday express out to Rangiora all via Kaiapoi.

48. The Site will step out the western edge of Rangiora, but as it exists in a peri-urban form now, such a change does not alter how the Site interacts with Rangiora as a whole. It is in many ways a functional part of urban Rangiora now; it's only the Zone boundaries and policy framework that create the sense of it not being part of Rangiora.

49. The Site is convenient to the Rakihura/ Ashley recreation trails, the racecourse, Arlington Park, and the airfield. The town centre is easily accessible.

50. The following assessment of the criteria in the NPS-UD for determining a well-functioning urban environment shows that the proposed rezoning will deliver urban, housing and residential outcomes that meet those criteria. There will be a variety of homes enabled by generous lot sizes. The Site is well-positioned, building as it does on an existing township well-serviced by public transport and cycling options, to provide good accessibility to jobs, community services, and open spaces, as well as mitigating climate change impacts and future natural hazards by being not near the coast and well removed from major rivers.

NPS-UD Policy 1

Planning decisions contribute to well functioning urban environments, which are urban environments that, as a minimum:	**Assessment**
(a) have or enable a variety of homes that: (i) meet the needs, in terms of type, price, and location, of different households; and (ii) enable Māori to express their cultural traditions and norms;	The proposal is to have larger lots supporting predominantly standalone dwellings and associated accessory buildings (including generous sized garaging) in an open landscaped garden setting. This will fill a gap in the range of housing typologies available at Rangiora and contribute to a better functioning urban environment overall at Rangiora. It is not necessary for each individual rezoning proposal to have a wide range of housing typologies, and in some circumstances this may not be appropriate. The rezoning will deliver a premier high amenity urban subdivision with generous sized lots which will complement existing and planned higher density residential development at west Rangiora. There is scope with the relief sought for a mix of residential densities. The appropriateness of this can be considered at the master planning/ODP stage. The Site has the potential to create a unique urban environment in Rangiora. It can follow the example of Palmview based on a lake or Kaiapoi Likes providing a niche housing option in Rangiora and the District meeting a need for residential land not constrained to GRZ standards.
(b) N/A business sectors	
(c) have good accessibility for all people between housing, jobs, community services,	The Site has access to a collector road and a strategic road providing easy access to key community amenities and facilities. The town is served by a public bus route to the city, and a cycle trail connecting to Kaiapoi and the City. The new West Rangiora Development Area adjoins the Site to the south. The Site will become closer to Rangiora public transport routes as they extend out to service this new growth area over time.

natural spaces, and open spaces, including by way of public or active transport; and	The Site is in walking distance to Arlington Park and the Rakahuri/Ashley which contains abundant recreations pace. It is easily accessible to the town centre and within walking distance to the Huntingdon Drive local centre.
(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and	The demand for housing and land in Rangiora is largely ahead of the planning means to respond. This proposal will "top up" the land presently set aside in the PWDP and provide a useful buffer to demand. The Site owners have been keen to release this land for more intense development for some time; there is no prospect of land banking.
(e) support reductions in greenhouse gas emissions; and	The Site has significant advantages in being easily accessible to the town centre and reserves, community facilities and schools. The proposal retains a consolidated form to Rangiora with good connectivity and linkages to recreation space and commercial centres reducing the need for car travel.
(f) are resilient to the likely current and future effects of climate change	The Site is within the area of influence of a major river but the non-urban flood assessment maps do not show extensive flooding likely at the Site. Being inland it is not at risk from climate change induced extreme natural hazard events like sea level rise. or river flooding.

Effects on ecosystems and habitats

51. The Site is currently used for a mix of low intensity (grazing) farming, and lifestyle purposes. Shelter belts and utility buildings have been established
52. The Site has been identified in the PWDP with two ecological overlays (the PWDP ecological overlay – Plains and Low Plains Ecological District). They are a district-wide overlays and no specific ecological values have been identified in the Proposed Waimakariri District Plan. These overlays seek primarily to retain indigenous vegetation. The PWDP identifies SASM 025 nearby the Site. That is a Site and Area of Significance to Maori and in SASM - Schedule 1 is identified as *being River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species.*

Effects on natural and physical resources

53. The Site drains in a SE direction towards the newly developing residential area.
54. There will be a degree of site disturbance as part of creating the roading network, and reserves, and as part of curtilage development on each lot.
55. The proposed use for residential activity inevitably leads to loss of some rural productive potential as land owner intentions are not about farming or productive use of the land, but lifestyle use and enjoyment. Built forms and hard surfaces become more dominant.
56. The Site comprises 4ha bocks now and these are not able to be used effectively for productive purposes other than for intensive productions based on tunnel housing and other supported production systems. None exist in the Site now.
57. The Site contains Class 2 and Class 3 soils as defined in the NZ Land Use Inventory (Landcare Research) Land Use Capability classes 1-3 **(Figure 10)**. Productive use of these soils other than for low level purposes i.e. grazing, is not feasible given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production).

Figure 10: Site soils: Site outlined in red; (Canterbury Maps)
Class 2 soils: bright green/Class 3 soils: light green;

Discharges of contaminants into the environment
58. There will be no discharges of contaminants into the environment. Wastewater will discharge to the Council's reticulated system.
59. Stormwater discharges will potentially be to ground given ground conditions or to an approved and consented stormwater management and treatment area which will meet all relevant Council standards.

Risks from natural hazards or hazardous installations
60. The PWDP planning maps show the Site as being within a Non-Urban Flood Assessment Area.
61. The District Plan maps do not identify high flood hazard areas or high coastal flood hazard areas, rather these are identified through the flood assessment certification process. This enables the most up-to-date technical information to be used. However, as a guide, areas that are potentially high hazard can be identified through the Waimakariri District Natural Hazards Interactive Viewer (NH - Introduction).
62. Rules that refer to a Flood Assessment Certificate require a certificate to be obtained from the District Council to determine compliance with the relevant rule. The alternative is to apply for resource consent as set out in the rule.

63. Rule NH-R2 states
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;

64. Assessment of flood risk and consequence can be undertaken at subdivision stage.
65. There will be no hazardous installations proposed on the Site.

Geotechnical assessment
66. The PWDP planning maps show the Site as being "Liquefaction damage is unlikely. Standard investigation procedure outlined in NZS3604 is appropriate".

Contaminated land
67. A Preliminary Site Investigation can be carried out for the Site at subdivision stage.
68. An enquiry of ECAN has identified that two sites at the northern end of the Site potentially contain some contaminated land, which can be investigated further at subdivision stage **(Appendix 6)**. 315 Lehmans Road is an unverified HAIL site (previous use for clay target shooting) and 317 is registered as containing uninvestigated persistent pesticide bulk storage.

Servicing
69. Proposals for servicing the Site and the effects from such servicing in relation to domestic water supply, wastewater, stormwater, roading, and telecommunications will be required for any subdivision consent.

Economic effects
70. It is anticipated that urban development will generate positive economic effects, both from the investigation/development phase and for the longer run economic activity from householders participating in the local economy.

Climate Change effects
71. An assessment of the effects of the proposed rezoning on climate change is included as part of the assessment of a well-functioning urban environment above.
72. A well-functioning urban area that is designed and serviced in an integrated manner, applying sound urban design principles, will enable a reduction in greenhouse gas emissions compared to unplanned, ad hoc development that does not create compact urban forms located where the services and benefits of existing, established urban areas are not readily accessible.
73. There is a triangle of planning influence that can be brought to bear on reducing greenhouse gas emissions
a) Compact urban form minimising distances between homes and work/play options.
b) Proximity of homes to community facilities, services and amenities and business/work areas.
c) Design and provision of movement corridors and linkages that create opportunities other than for vehicles for getting

around.
74. The Site of the proposed rezoning:
a) Helps in retaining a compact urban form to Rangiora.
b) Is easily accessible to the town centre and is located convenient to the recreation resources of the nearby Rakahuri/Ashley River, the airfield and racecourse and Arlington Park.
75. Rangiora has excellent connectivity to the City, both via the Northern Motorway, the new Northern Corridor, a cycle way link to Kaiapoi which is linked to the new north city cycle way along the Northern Corridor and a very regular bus service.

Positive effects
76. The proposed rezoning will provide for the continued growth of Rangiora by managing the development through an ODP. The proposal will provide a buffer to on-going high level demand for lots in Rangiora. It will cater for a specific housing need not found in GRZ Zoned land nor LLRZ land. The proposed rezoning is anticipating a form of development that is a much more efficient use of a qualifying site supporting a well-functioning urban area. It is a positive endorsement of Rangiora as a growth node in the District.
77. The benefits derived from a planned ODP approach include facilitating high levels of connectivity, creating community links to identified focal points. The Site is close to recreation facilities. A coordinated and integrated development will provide a distinctive environmental quality and point of difference to the development.
78. The Site adjoins existing and developing residential development on the western edge of Rangiora.
79. From a community well-being perspective, the provision of additional land for residential growth will continue to support the Council's investment in community infrastructure by maintaining and facilitating growth rates, increasing the rating base and attracting development contributions.

STATUTORY PLANNING ASSESSMENT
80. Submissions must be assessed under the provisions of the RMA, including Part 2 and Section 32 (Requirements for Preparing Evaluation Reports).

National Policy Statements
National Policy Statement on Urban Development Capacity (NPS-UD)

81. The NPS–UD applies to this proposal as it is directed at Tier 1 urban environments, and
Tier 1 local authorities which includes Waimakariri District as part of the Christchurch urban environment that is defined in Table 1 of the NPS, and additionally defined as:
any area of land (regardless of size, and irrespective of local authority or statistical boundaries)
that: is, or is intended to be, predominantly urban in character; and is, or is intended to be, part of
a housing and labour market of at least 10,000 people.
82. The NPS-UD recognises the national significance of:
a) Having well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future; and
b) Providing sufficient development capacity to meet the different needs of people and communities.
83. The NPS outcomes are to be achieved through objectives that address:
a) Planning decisions improving housing affordability by supporting competitive land and development markets.
b) Regional policy statements and district plans enabling more people to live in areas of urban environments near centres or areas with employment opportunities, area well serviced by public transport or a high demand for housing in the area.
c) Urban environments developing and changing over time in response to diverse and changing needs of people, communities and future generations.
d) Local authority decisions on urban development being integrated with infrastructure planning and are strategic over the medium term and long term.
e) Local authority decisions on urban development are responsive particularly for proposals supplying significant development capacity.
f) New Zealand's urban environments support reductions in greenhouse emissions and are resilient to current and future effects of climate change.
84. The key method to achieve these objectives is by development of a Future Development Strategy (FDS). This will set out how the Councils will provide for sufficient development capacity over the next 30 years to meet expected demand. There is no FDS for the greater Christchurch Urban Area that meets the requirements of the NPS-UD.
85. Work on development capacity completed for the NPS - UDC 2016 by the Greater Christchurch Partnership as an Update of the existing Urban Development Strategy (UDS) – Our Space 2019 confirmed what there was a shortage of feasible development capacity for future housing in Waimakariri District for the medium (next 10 years) and long term (10 to 30 years) periods. That assessment is now out of date as it does not address the requirements of the NPS-UD; and rates of take up of land have exceeded projected rates.

86. One of the key changes in the NPS-UD is that local authority decisions on urban development that affects urban environments are responsive, particularly to proposals that would supply significant additional capacity. It also amends the required methodology for housing and business capacity assessments.
87. The current CRPS does not meet the new NPS-UD requirement in relation to proposals for significant additional capacity. Regional councils are required to include criteria in the RPS to determine what plan changes will be treated for the purposes of Policy 8 as adding significantly to development capacity as soon as practicable. ECAN has yet to respond to this requirement.
88. The NPS-UD has immediate effect, so in the meantime, proposals such as this submission must be assessed in the context of the overall intent and purpose of the NPSUD as articulated in the NPS-UD objectives and policies. This includes that NZ has well-functioning environments; provides sufficient development capacity to meet the different needs of people and communities; planning decisions improve housing affordability to contributing to competitive house and land markets; and RMA plans enable more people to live near major employment areas, where there is existing or planned public transport, and where there is high demand for housing.
89. The NPS-UD is the higher order document and its requirements override those of lower order documents where there is a conflict, including regional and district RMA plans.
90. Key objectives and policies in the NPS-UD are assessed here:

NPS-UD Objective/Policy	**Assessment**
Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	The proposed development will further enable Rangiora to sustain itself as a well-functioning urban environment by consolidating the residential area close to the town centre, and provide residential development close to public transport links and existing community and commercial facilities including Huntingdon Drive local centre.
Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.	The proposal provides choices in the Rangiora housing market and in doing so supports housing affordability. Whilst the proposal is for a premier larger lot urban residential development, it is important that all sectors of the market are catered for. This will be more affordable than forcing those wanting large sections out to the much larger and very limited areas of LLR D1 development, or having to purchase 2-3 sections in a standard residential subdivision. There Site is in multiple ownership and the landowners are working together to achieve the rezoning. It will bring more competition into the market by bringing new entrants into the market.
Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply: the area is in or near a centre zone or other area with many employment opportunities the area is well-serviced by existing or planned public transport there is high demand for housing or for business land in the area, relative to other areas within the urban environment.	The CRPS is due for review in 2024 but in the meantime the existing CRPS is not in accordance with the NPS-UD 2020. The proposed rezoning is on the edge of the District's largest centre, which offers a wide range of community and business services, and employment opportunities. It is expected that a proportion of future residents will commute outside the township, but as the township and associated business areas e.g. at Southbrook, continue to grow, this is expected to become proportionally less. Rangiora is well serviced with public transport, there is scope for future mass transit PP, and there is a high demand for housing at Rangiora. The Site adjoins the new West Rangiora Development Area, to the south. Extensions of public transport to service this growth area will be readily accessible to the Site.
Objective 6: Local authority decisions on urban development that affect urban environments are: integrated with infrastructure planning and funding decisions; and strategic over the medium term and long term; and responsive,	Whilst not currently identified as a future growth area in RMA documents, the Site is well placed at the township edge to be serviced by existing infrastructure. Some upgrades may be required, which will be investigated further with Council prior to the hearing. See Policy 8 below for commentary on proposals which supply

particularly in relation to proposals that would supply significant development capacity.	significant development capacity
Objective 8: New Zealand's urban environments: support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change	The proposal adjoins the existing built up are of Rangiora, close to public transport links. Its excellent accessibility to Christchurch City, substantially enhanced with the new Northern Motorway extensions, means it is now highly accessible to these nearby major employment areas. Travel distances are relatively short, minimising vehicle miles and the potential for greenhouse gas emissions. There is a cycleway link from into Christchurch City, and regular bus services, including an express route. The Site is inland and not subject to natural hazard risks associated with sea level rise arising from climate change.
Policy 1 – Planning decisions for well-functioning urban environments	Assessed at para 41-50
Policy 2 - Sufficient development capacity Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.	The proposed rezoning is anticipated to provide sections that will be available for the short term (up to 3 years) and into the medium term (3-10 years) if adopting a more conservative outlook. The locational and amenity advantages of Rangiora also favour strong ongoing demand. The PWDP UFD-O1 Feasible Development Capacity for residential activities identifies the need for 6300 residential units in the period 2018-2028, and 7100 residential units 2028-2048. These numbers are derived from Chapter 6 CRPS Table 6.1. and are out of date. Data from the Council (November 2021) confirms that there are about 800 vacant lots in Rangiora. Building consents are at about 180/year. That means there is about 4 years vacant land supply. A lead in time of 3-5 years is needed to go from rezone to house build so the Council is facing an unnecessary squeeze on land availability. That will translate in to an upward shift in land and section prices as has been the case at Rolleston. The data suggests that the PWDP will be late to the party to ensure there is at least sufficient development capacity to meet expected demand for housing land over the short term, medium term, and long term. There is a looming, inevitable land supply issue so any proposal to add capacity will push the Council closer to meeting the requirements of the NPS-UD. The proposal is consistent with ensuring there is at least sufficient land supply for housing.
Policy 8 – Responsiveness to plan changes Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is: (a) unanticipated by RMA planning	The proposed rezoning is not anticipated by RMA documents - it is not a Greenfield Priority or Future Development Area in the CRPS, or a New Development area in the PWDP. A responsive approach to the proposal is required as it meets the Policy 8 criteria for unanticipated zoning. It will contribution to well functioning urban environments and will add significant development capacity. There is no development capacity for the housing typology proposed – so any provision is significant in this context. The development will deliver appx 311 high amenity large lot residential sites at an average density of 1500m2. This will be higher if a mix

documents; or
(b) out-of-sequence with planned land release

of densities are proposed, which may be appropriate in some parts of the Site, dependent on master planning work to follow.

91. Adopting the submission to re-zone the land, and enable the proposed development on the submission Site will satisfy the objectives and policies of the NPS-UD.

Proposed National Policy Statement for Highly Productive Land (NPS-HPL)

92. The Government proposed in 2019 a NPS-HPL to prevent the loss of productive land and promote its sustainable management. The overall purpose of the proposed NPS-HPL is to improve the way highly-productive land is managed under the Resource Management Act 1991 (RMA) to:

a) Recognise the full range of values and benefits associated with its use for primary production
b) Maintain its availability for primary production for future generations
c) Protect it from inappropriate subdivision, use, and development.

93. The NPS-HPL is still a proposal and not intended to take effect until after Gazettal. At the date of this submission the NPS-HPL has no effect and no assessment of it is required for the purposes of this submission.

94. The Proposed NPS-HPL interim definition of HPL is land defined as Land Use Capability Class 1-3 soils. A portion of the Site contains Class 2 and 3 soils (see **Figure 10)**. Highly productive use of these soils is not realistic given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production). Its present use as lifestyle blocks, low level grazing and agistment is the more likely long run use of the Site if not rezoned.

95. Objective 3 of the Proposed NPS-HPL specifically refers to highly productive soils being protected by avoiding *"uncoordinated urban expansion on highly productive land that has not been subject to a strategic planning process"*. The Site was assessed through a strategic planning process (WDDS 2018) and the RRS as a preferred site for LLRZ development, and rejected for a change in zoning on the basis that it may be required for long term urban growth of Rangiora.

96. It is therefore considered that this submission to re-zone the Site is largely in accordance with the Proposed NPS-HPL.

National Planning Standards

97. The National Planning standards prescribe various matters under the RMA so that there is consistency among planning documents most relevantly here in terms of appellations for zones, and the standards applying to these zones.

98. The proposed rezoning adopts the standard zone appellation, in this case LLRZ as contained in the PWDP.

99. The PWDP identifies plan standards for minimum and average net site areas for the respective zones. These are modified for the proposed rezoning as a higher density LLRZ.

100. The higher density LLR zoning is entirely consistent with the NPS purpose for the LLRZ as reproduced below. In this case, the principal constraint to more intensive development is the peri-urban location where a lower density transition to the rural environment is appropriate (particularly noting that the zone boundary is 'mid block' so there is no natural or physical buffer between rural and residential areas); the existing pattern of 4 ha lots with existing substantial homes and gardens; and the fact that the premier large lot subdivision proposed relies on consistency of housing quality and character to be deliver on this vision for the area.

Large lot residential zone

Areas used predominantly for residential activities and buildings such as detached houses on lots larger than those of the Low density residential and General residential zones, and where there are particular landscape characteristics, physical limitations or other constraints to more intensive development.

Low density residential zone

Areas used predominantly for residential activities and buildings consistent with a suburban scale and subdivision pattern, such as one to two storey houses with yards and landscaping, and other compatible activities.[2]

Canterbury Regional Policy Statement 2013 (CRPS)

101. Chapter 6 of the RPS *"provides a resource management framework for the recovery of Greater Christchurch, to enable and support recovery and rebuilding, including restoration and enhancement, for the area through to 2028. Recovery in Greater Christchurch is also supported by the provisions in Chapter 5 notated as 'Entire Region'. The provisions in the remainder of the RPS also apply.3"*

102. An assessment of the proposed rezoning against the relevant CRPS Objectives and Policies is set out in **Appendix 1**. This should be read in the context of the CRPS being overdue for review and that it does not provide a regional response to the NPS-

UD. The
need to focus on earthquake recovery has now passed and so many of the directive provisions need to be given appropriate 'weight' in a new national policy environment with a focus on flexible, responsive panning approaches that better provide for people's needs and well-being.

103. That assessment shows that

a) The development proposal achieves the objectives for the location, design and function of new developments (Objective 5.2.1)

b) The traffic effects of the proposal are unlikely to give rise to adverse effects and so achieves CRPS objectives for the strategic land transport network (Policy 5.3.7)

c) The Site falls outside the FDAs shown on Map A of Chapter 6 and in that regard is inconsistent with RPS Policy 6.2.1 clauses 1 to 3.

1. identifies priority areas for urban development within Greater Christchurch;

2. identifies Key Activity Centres which provide a focus for high quality, and, where appropriate, mixed-use development that incorporates the principles of good urban design;

3. avoids urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS

d) The environmental effects assessment outlined above establish that the proposed development is consistent and will not give rise to any concerns with respect to all the matters listed in RPS Policy 6.2.1 clauses 4. to 11. These matters are:

6.2.1 Recovery framework

Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that:

1. As above;

2. As above;

3. As above;

4. protects outstanding natural features and landscapes including those within the Port Hills from inappropriate subdivision, use and development;

5. protects and enhances indigenous biodiversity and public space;

6. maintains or improves the quantity and quality of water in groundwater aquifers and surface waterbodies, and quality of ambient air;

7. maintains the character and amenity of rural areas and settlements;

8. protects people from unacceptable risk from natural hazards and the effects of sea-level rise;

9. integrates strategic and other infrastructure and services with land use development;

10. achieves development that does not adversely affect the efficient operation, use, development, appropriate upgrade, and future planning of strategic infrastructure and freight hubs;

11. optimises use of existing infrastructure; and

12. N/A

e) The proposed rezoning achieves policies relating to:

- Sustainability;
- Integration of transport infrastructure and land use;
- Urban design; and
- Biodiversity, natural hazards, landscape, soils, contaminated land.

104. In terms of the CRPS polices for rural residential developments (Policy 6.3.9) the proposal sits square with all policy matters other than being a location identified in an adopted Rural Residential Strategy; and being at a higher density than provided for under this policy (ie greater than 1-2 hh/ha). As such it has a majority of features entirely consistent with the policy.

105. The CRPS includes housing capacity targets as below

6.2.1a Targets for sufficient, feasible development capacity for housing [inserted in accordance with sections 55(2) and 55(A) of the Resource Management Act 1991, from the National Policy Statement on Urban Development Capacity 2016]

For the period 2018-2048, sufficient, feasible development capacity for housing is enabled in Greater Christchurch in accordance with Table 6.1.

Table 6.1 Targets for housing development capacity in Greater Christchurch, 2018-2048

106. These derive from Our Space, under the requirements of the then NPS-Urban Development Capacity 2016, since replaced by the NPS-UD 2020. The targets (known as bottomlines in the NPS-UD) are to be treated as 'minimums' not 'maximums'.

Policy 6.3.12
enables urban development in the Rangiora and Kaiapoi FDAs (new Development Areas in the PWDP) where needed to meet the medium term targets. This a 'minimum' allocation approach contrary to the NPS-UD. The NPS-UD favours over allocation, including in locations unanticipated by RMA plans, where it will add additional development capacity, can be integrated with infrastructure planning and funding, and will contribute to well functioning urban environments – as is the case the proposed Lehmans LLR D2 zone.
107. The proposed Lehmans LLR D2 zone is consistent with the CRPS except with respect to those parts of the CRPS which are out of step with and do not give effect to the higher order plan, the NPS-UD.

Proposed Waimakariri District Plan
108. An assessment of this proposal against the relevant PWDP Objectives and Policies for urban growth and development as notified on 17 September 2021 is set out in **Appendix 2.**
109. That assessment shows that the proposed rezoning is entirely consistent with the relevant objectives and policies, including as sought to be amended by this submission. Those amendments are to UFD-P3 Identification/location and extension of Large Lot Residential Zone areas; and LLRZ-O1 and LLRZ- P1-5 and reflect the intent and outcomes intended for the proposed LLRZ D2 zone, which is a higher density LLRZ zone than the PWDP LLRZ zone (renamed LLRZ D1 in this submission).

ASSESSMENT AGAINST OTHER PLANNING DOCUMENTS
Our Space 2018-2048 Greater Christchurch Settlement Update (2019)
110. Our Space is a non-statutory document prepared under the Local Government Act. It
"responds to the new Government Policy Statement on Land Transport, which has increased funding for mass public transit schemes, and meets the requirement of the National Policy Statement on Urban Development Capacity (NPS-UDC) 2016 to prepare a
future development strategy…. Specifically, it:
• sets out how targets for housing for the next 30 years will be met, accommodating an additional 150,000 people;
• identifies locations for housing growth, encouraging Central City and suburban centre living while providing for township growth in Rolleston, Rangiora and Kaiapoi;…
• promotes a compact urban form, which provides for efficient transport and locates development in a manner that takes into account climate change and sea level rise.[4].

..Underpinning this settlement pattern approach is the vision for a transformation of the transport network that fosters much greater public and active transport usage, and reduced reliance on the private vehicle.
111. Our Space acknowledges that this will require commitment from the Government to invest in the necessary improvements to our transport system, which could include investing in rapid transit services. To date, there has been no successful business case for improved public transportation, including not as a Covid 19 fast track infrastructure project.
112. The Our Space housing capacity targets (Table 3) and Future Development Areas are related to growth of urban areas.
113. Our Space, like the CRPS (and the Operative District Plan) are now out of date, as they do not reflect or give effect to the new requirements of the NPS-UD.

Waimakariri 2048 District Development Strategy (WDDS)
114. The preferred growth directions for Rangiora in the WDDS 2048 (2018) are outlined above (under 'Site') i.e. westwards to Lehmans Road, and otherwise eastwards. However, the Council in its decision on the RRS, recognized west of Lehmmans Road as a potential longer town urban growth area.
115. The WDDS Rangiora Snapshot (pp38-39) -when looking ahead to 2048 proposed that:
a) Rangiora remains the District's largest town
b) 30,000 – estimated population (2048)
c) 12,025 – estimated households
d) 5,025 - new households in Rangiora
e) Continues to accommodate one third of the District's residential growth
f) 167 – estimated annual building consents for new dwellings for the next 30 years
g) 423 hectares of additional feasible residential land required by 2048 (this includes capacity in remaining stages of existing residential developments as well as new greenfield areas inside and outside of the Infrastructure Boundary)
h) Future residential growth directions proposed to the east (predominantly) and west of the current town
i) Opportunities for intensification/regeneration to be identified
j) New growth directions take into account areas of unacceptable natural hazard risk and areas of significant environmental and cultural values
k) New growth areas to connect into existing sewer and water networks

l) Stormwater Levels of Service designed to meet increased performance requirements

116. At the 2018 Census Rangiora had a population of 17,841, and 7314 total dwellings (incl those unoccupied and under construction). Population projections for the District show an average annual change 2018-2020 of 1700 persons. If Rangiora continues to attract a third of all district growth as stated in the WDSS then Rangiora's population in 2021 will be around 18,900.

Mahaanui Iwi Management Plan

117. Part 1 of the PWDP in a section "Mana Whenua" sets out the position with respect to iwi and the review of the district Plan:

a) The District's territorial area sits within the takiwā (territory) of Ngāi Tūāhuriri which is one of eighteen Ngāi Tahu regional papatipu rūnanga, constituted under the ***Te Rūnanga o Ngāi Tahu Act 1996*** *to represent* ***mana whenua*** *interests.*

b) The preparation and change of a district plan must take into account relevant iwi documents. For the District, Ngāi Tahu has set out its resource management values, issues, objectives and policies within the Mahaanui Iwi Management Plan (2013).

c) The Mahaanui Iwi Management Plan identifies objectives, issues and policies for natural resource and environmental management for six pāpatipu rūnanga (including Te Ngāi Tūāhuriri Rūnanga). It seeks to ensure that the taonga and resources of Ngāi

Tahu mana whenua are recognised and protected in the decision-making of statutory agencies. The Mahaanui Iwi Management Plan contains a comprehensive suite of policies and objectives addressing the range of resource management matters of significance to tangata whenua. The District Council shall have regard to the Mahaanui Iwi Management Plan when preparing or changing the District Plan, to the extent its content has a bearing on resource management issues of the District.

118. The Mahaanui Iwi Management Plan (MIMP) 2013 was released on 1 March 2013.

119. The MIMP is a tool for tangata whenua to express their identity as manawhenua and their objectives as kaitiaki, to protect their taonga and resources, and their relationships with these. The MIMP seeks to ensure that these taonga and resources are recognised and protected in the decision-making of agencies with statutory responsibilities to tangata whenua. Importantly it is also a tool that assists Papatipu Rūnanga representatives to articulate their values, issues and policy into statutory processes.

120. The MIMP includes both general objectives and policies about the management of land, air, and water, and also includes catchment specific objectives and policies.

121. Section 5.3 Wai Maori (pp77-98) contains an extensive discussion about tangata whenua rights and interests in freshwater. It provides a suite of Issues, Objectives and Policies for freshwater

122. Section 5.4 Papatuanuku (pp101-124) sets out the Ngai Tahu Subdivision and Development Guidelines that are to be read along-side objectives relating to:

a) Land use planning and management in the takiwā reflects the principle of Ki Uta Ki Tai. (from the mountains to the sea)

b) Rural and urban land use occurs in a manner that is consistent with land capability, the assimilative capacity of catchments and the limits and availability of water resources.

c) Inappropriate land use practices that have a significant and unacceptable effect on water quality and quantity are discontinued.

d) Ngāi Tahu has a prominent and influential role in urban planning and development.

e) Subdivision and development activities implement low impact, innovative and sustainable solutions to water, stormwater, waste and energy issues.

123. Section 5.5 Tane (pp127-137) includes objectives that focus on:

a) Regional policy, planning and decision making in the takiwā reflects the particular interest of Ngāi Tahu in indigenous biodiversity protection, and the importance of mahinga kai to Ngāi Tahu culture and traditions.

b) The customary right of Ngāi Tahu to engage in mahinga kai activity is recognised, protected and enhanced…

c) Customary use, and therefore mahinga kai, is given effect to as a first order priority for freshwater management in the takiwā.

124. Section 6.4 (pp213-224) addresses issues of particular significance to the lands and waters of the Waimakariri catchment within which the Site lies.

125. Relevant Objectives relating to urban development of land in that catchment include:

a) The natural "energy, vitality and life" of the Waimakariri River as a braided river is protected and restored.

b) The discharge of contaminants to the Waimakariri and its tributaries is eliminated.

c) Water quality and flows in the Waimakariri and its tributaries are improved to enable whānau and the wider community to have places they can go to swim and fish.

d) The mauri and mahinga kai values of the Waimakariri and its tributaries and associated springs, wetlands and lagoons are protected and restored; mō tātou, ā, mō kā uri ā muri ake nei.

126. A key issue relating to subdivision and development is that subdivision and development activities in the lower catchment

have the potential to adversely affect Ngāi Tahu values such as waterways, mahinga kai and sites of significance (Issue Wai4).
127. The proposal provides for full urban reticulation of the three waters and is consistent with the objectives and policies contained in Chapters 5.3 and 5.4 of the MIMP. The proposal does not preclude individual land owners from installing rainwater collection and use from roof areas at the time of building development.
128. The proposal has been designed taking into consideration the potential effect of resultant subdivision and development on the rivers and streams that flow into the lowland rivers.
129. Overall it is considered that the proposal will not have adverse impact on the cultural values of iwi as set out within the MIMP.

SECTION 32 ASSESSMENT

130. A Section 32 assessment is contained in **Appendix 3.**
131. In summary, the PWDP zoning and associated rules (RLZ Zone with a minimum lot size for subdivision and a dwelling 4ha) do not meet the needs and aspirations of the current owners.
132. Strategic Council planning documents (specifically the WDDS) have a focus on only meeting urban growth demands within urban environments of existing towns. They favour intensification (15hh/ha) and a strict allocation of capacity by development areas. It is a control and command regime consistent with Map A of Chapter 6 of the CRPS but is out of step with the requirements of the NPS-UD which requires a more flexible, responsive approach, prohibits a hard fixed unmoveable urban/rural boundary.
133. This approach leaves little room for new proposals or proposals that do not sit square with the standard array of GRZ/medium density or SETZ (Settlement Zone). SETZ applies to some of the District's smaller settlements outside Greater Christchurch.
134. Neither LRZ nor Large Lot Residential (LLRZ) as notified in the PWDP is an efficient use of this block of land located as it is immediately adjoining the urban area of Rangiora, and in a location easily accessible to the town centre by active transport modes as well as car and several district reserves.
135. If this Site is not zoned for LLRZ D2 (minimum average lot size 1500m^2) use to enable residential re-development then it will drive pressure to re-zone elsewhere. That step potentially will not have the significant benefits to Rangiora long term in relation to enabling a well-functioning urban environment that enables people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future. Additionally re-zoning to LLRZ D2 will contribute to providing additional development capacity to meet the different needs of people and communities in a planned manner and consistent with the NPS-UD.
136. The Site can readily be developed to reflect the principles of the Urban Design Protocol with values of character, context, and connectivity.
137. The Section 32 assessment concludes that the proposal to re-zone the Site from LRZ zone to LLRZ D2 Zone (average lot size 1500m_2) is the most appropriate method for achieving the objectives of the proposal, than the other alternatives considered.
138. Option 2 identified in the s 32 assessment is consistent with some PWDP policies notwithstanding that it does sit square with the strategic intentions signaled in the WDDS and the PWDP approach to providing for development capacity and urban development.
139. Option 2 identified in the s 32 assessment to re-zone the Site is the most appropriate given:
a) The proposals adopt the PWDP zones, development and activity standards with appropriate amendments. This ensures continuity of the District Plan anticipated environmental outcomes and urban amenity for Rangiora and adjoining residential areas;
b) Will be consistent with and give effect to many of the relevant PWDP objectives and policies;
c) It is a logical extension to the developed and developing residential land adjoining the Site while achieving a compact, efficient urban form that removes pressure on isolated rural land elsewhere around Rangiora.
d) It gives effect to the NPS-UD, specifically Objective 6 c) and Policy 8, delivering significant additional development capacity and contributing to a well functioning urban environment.
e) It is assumed that there will be capacity in the public utilities and the existing road network, including planned upgrades, to accommodate the traffic effects of the redevelopment;
f) The proposed Site specific ODP will provide certainty of the final form and disposition of the re-zoned area including its proposals for reserves, roading, future linkages for pedestrian and vehicular traffic.
140. The re-zoning proposal is considered to be appropriate to achieve the sustainable growth and development of Rangiora.
141. The economic, social and environmental benefits of the proposed rezoning outweigh any potential costs.
142. The overall efficiency and effectiveness of the proposed rezoning (Option 2) is high, in comparison to the alternative options set out in the s 32 Assessment which are low (Options One and Four) or low to moderate (Option Three).
143. The PWDP proposes to release land for development in the new Development Areas at Rangiora and Kaiapoi through a novel and untested certification process that is not clearly derived from RMA statutory powers, nor Local Government Act 2002 (LGA) authority. This approach is not proposed for the LLR Overlay areas. As the proposed Lehmans Road LLR D2 zone proposed by this submission seeks large lot urban densities, it is anticipated that Council may favour the certification process if it accepts the proposed rezoning. This is opposed – rezoning to LLRZ D2 is sought.
144. Potential difficulties with the proposed certification process are identified and discussed in the Section 32 Assessment.

(**Appendix 3)**. In summary, the process is hugely discretionary, does not provide conventional rights to an applicant (eg right of objection/appeal) meaning decisions cannot be challenged, and it is not apparent that the process will be appropriately documented with a transparent record of the decision-making within the certification process. Further uncertainty arises in the practicalities of how to negotiate and manage the staging, funding and building of key infrastructure across a range of Sites, and a risk that land supply is controlled by a limited number of large developers. It is a far less efficient and effective method for delivering land for housing than the Council rezoning the land in the PWDP.
145. The proposed rezoning is considered to be the most appropriate, efficient and effective means of achieving the purpose of the RMA.

CONSULTATION
146. The landowners and their consultants have submitted on the WRRS and the WDDS (**Appendix 4)**.
147. The submissions to re-zone as rural residential or identify the Site as suitable for LLRZ have been rejected as noted above. LLRZ but at higher densities as now proposed is considered to be a more efficient use of the land and better meets market demand. 5000m^2 sites provide more land is needed for a spacious home and garden.
148. The landowners have been consistent in their wish to find a zone and possible land uses better suited to their needs.

CONCLUSION

173 The submission seeks to rezone 58 ha of land adjoining Rangiora from Lifestyle Rural Zone (LRZ) to Large Lot Residential with a specific density standard (LLRZ D1), minimum average lot size 1500m^2.
149. The Site has a long history of rural lifestyle use. It is not significantly restricted by potential natural hazards especially flooding, nor does it have physical limitations for development for residential purposes as it is not liquefaction prone, and has no known geotechnical limitations but does contain an area of LUC 2 soils. It is near a site of significance to iwi (SASM – 025) being the Rakahuri/Ashley River The Site has access to a collector road and is near to a strategic road giving direct access to the town centre and a range of community amenities and facilities.
150. The Site immediately adjoins the urban area of Rangiora, and is well located to join in to Council utility services. It is well suited for conversion to residential use.
151. The Site is not identified within the westward growth direction for Rangiora in the District Development Strategy 2018 nor is it part of the DEV-WR development area which adopts Lehmans Road as its western boundary. It is in a location that achieves coherent and compact urban form offering ease of access to business services, community facilities, reserves and the primary road network.
152. The proposed rezoning provides for a connected and high amenity residential living environment not presently available under the PWDP while avoiding and/or mitigating any potential adverse effects on the environment. It will provide for continuing high demand for a variety of high quality residential sections aimed at a particular segment of the housing market in an ideal location, easily accessible to the existing town centre services and facilities. It will broaden the range of housing available. As such, it is consistent with the NPS-UD including Objective 6c) and Policy 8, to be responsive to proposals which supply significant development capacity and contribute to a well functioning urban environment.
153. The use of this Site for residential purposes can be a sustainable and efficient use of land and infrastructure. The proposed rezoning better provides for the social, economic, environmental well-being of the landowners and the Rangiora community than continuation of the current low intensity lifestyle land use on 4ha blocks, or a conventional LLRZ residential use.
154. Any potential adverse effects of the implementation of the proposed rezoning can be assessed at subdivision stage but there has been no restriction on servicing the blocks to date. Capacity will need to be confirmed for infrastructure, power and road network. Any future subdivision of the Site will need to confirm water supply and wastewater treatment and disposal options.
155. Rezoning of the site to LLRZ zone is not inconsistent with the policies and objectives of the PWDP, but it is at odds with the dated CRPS approach to provision of urban growth and housing capacity for Greater Christchurch, to the extent that it is not within an FDA created by Change 1 to the CRPS and is not identified as an LLRZ site under the strategic RRS prepared by the Council.
156. As the proposal helps achieve the purpose of the RMA, and has been shown to be consistent with the relevant provisions of the NPS-UD, the submission can be accepted by Waimakariri District Council.

Original Submission

Summary Reasons for the Submission

The reasons for our submission are outlined below.
a) The preferred relief (**the proposed rezoning**) is both appropriate and necessary to achieve sustainable growth and

development of Rangiora and the District and meet the requirements of the National Policy Statement for Urban Development 2020 (**NPS-UD**).

b) The Site identified in Figure 1 and at para 1 of the Preferred Relief above is a logical and preferred location that lends itself to a specific type of housing development not provided within the PWDP as a residential option adjoining but outside the existing urban areas. Nowhere is it possible to develop in a comprehensive, coordinated way a low density, high quality residential environment in the District's towns, the Rural Lifestyle Zone or Settlement Zone as a permitted activity.

c) The requirement for 12/15 hh/ha in GRZ zones (the majority of land in urban areas) drives development to modern scale relatively small urban lots best produced as a package across a significant land holding. The GRZ subdivision standards do not provide for the needs of people who seek a generous sized urban lot residential setting. This is a housing sector that is running against the planning tide of intensification but is, nonetheless, a legitimate form of housing in an appropriate setting. The barriers to such development in urban areas requires an appropriate setting/ location in the rural areas but close to or adjoining the urban areas and at a much lower density than is desired or appropriate (the PWDP LLRZ) to meet the housing needs for generous sized urban lot residential living..

d) The PWDP subdivision standards for LLRZ require lots that are very large for those whose primary interest in a rural setting is a form of residential living, not one that requires significant maintenance and management often involving animals or machinery at scale. Conversely, the GRZ subdivision standards do not provide for the needs of people who seek a large lot residential setting

e) The focus in the PWDP is on prescribing a limited range of residential options and tightly controlling and constraining housing choice within those options. Further urban growth is also tightly constrained and controlled around DEV areas around Rangiora and Kaiapoi but for a very specific form of residential development driven off density requirements that do not match the needs of all landowners.

f) The focus in most new District Plans, driven in part by the National Planning standards, is to simplify the range of zones, to standardize lot sizes, to supposedly create efficiency and certainty through ease of administration of the District Plans. This is done by constraining housing and land development choices by lot size, by location, by built standards and the disposition of built/open elements in a site. However, the National Planning standards do provide for large lot urban residential living, a residential living option which has not been taken up the PWDP (due most likely to the restrictive provisions of the CRPS which only prescribe one from of lower density residential living, at a density of 1-2 hh/ha).

g) This planning approach may be a standard approach to resource allocation but it does not provide a flexible, responsive approach to innovative and new development options. The Government is creating policy settings that on one hand seek intensification in urban areas, while at the same time pushing away from a land allocation model of planning. The PWDP in striving to face both policy directions has a package of measures that are in fact a major barrier in terms or cost, timeframes and certainties for proposals that are not cut from the suite of housing and development options set out by the PWDP. The allocation of land in preferred development areas, it must be said, runs counter to the Government's push, and now its direction, to free up land for development, to encourage innovation in housing (presently with a focus of intensification) and to make available a range of responses to the need to meet the housing needs of people and communities set out in the NPS-UD.

h) While the weight of demand (and the planning response) is around affordable housing, around small lots and dense development that supports investment in public facilities and amenities such as public and active transport, reserves, and commercial services, there is always a wide spectrum of preferences at play in the housing market. The demand for high quality, generous houses set on generous sized parcels of land within high amenity settings is an important and no less relevant housing sector. There is a strong unmet demand, as confirmed by advice from Bayleys real estate (**Appendix 5**) for larger family homes with room for a pool or similar. Purchasers want to be close the amenities of Rangiora and within walking and cycling distance of local schools. They do not want the only available options – a 4 ha lifestyle block or 5000m^2 rural residential site at Mandeville or Ohoka.

i) Interestingly enough for a nation built on the so-called quarter acre paradise, recent policy and planning interest in housing and land development has now seemingly positioned the 1011m^2 section as a luxury item, as the antithesis of providing for community well-being and needs. It is as though the old quarter acre of itself acts against building a sense of community despite being able to be developed in a planned, structured, coordinated or integrated manner. Rather than being a frivolous discretionary item in land development
and housing choice, a well-planned, well located and properly serviced low density residential environment has much to offer urban environments. They can be tactically used to provide shape and edge to urban areas, they can provide a mass of amenity different from (and potentially complementary to), but no less legitimate in urban outcome terms, to conventional GRZ zoned land.

j) In many ways the approach of a district plan to the role and place of the old quarter acre is not dissimilar to the issues faced by comprehensive retirement villages when first proposed. The idea of dense, almost gated and self-contained communities, with multi storey buildings also did not sit well in many district plans. But now they are accepted as an important part of the urban fabric catering to a specific demographic and health demographic. Most plans enable them.

k) Provision for low density residential in an urban setting, or failing that likelihood, in an adjoining rural zone is a fundamental gap in the district plan.

l) The submission seeks to provide for another housing typology not provided in the PWDP and in a location with significant planning merit. The planning case was made out in a detailed submission to the proposed Rural Residential Strategy (**RRS**) for

the land identified in this submission to be “reserved” for conventional Rural Residential zoning in the review of the District Plan. That submission was rejected in favour of a decision ascribing an unspecific strategic significance to Lehmans Road as the urban boundary; simply the decision was that rural residential development here would preclude this area as a future urban growth path, even though this was likely to be very long term as the Waimakariri District Development Strategy (WDDS 2018) for the period up to 2048, does not favour urban growth west of Lehmans Road.

Officer Recommendation

Continue to exclude the area west of Lehmans Road and the racecourse land at Rangiora as growth areas as these were originally considered but not included in the draft RRDS as they trigger the key preliminary criteria of: being on the direct edges of a main town outside of the Projected Infrastructure Boundary (PIB) thereby foreclosing more intensive long-term urban development, and…

Panel Recommendation

The panel accepted the officer recommendations to exclude areas on the fringes of Rangiora in the final RRDS due to these having the potential to foreclose more intensive long-term urban development of the town.

m) In light of the above decision on the Waimakariri Rural Residential Strategy, the proposal now is for a form of high amenity low density urban zoning, which whilst in demand is entirely absent from the PWDP. This will be a long term urban form of development. The proposal set out in the submission will achieve a compact, and efficient, urban form on the edge of Rangiora with excellent connectivity by multiple transport modes. It provides for continuous urban development by enabling a built form which can act as a strong zone or urban boundary.

n) The proposed rezoning will accommodate approximately 311 LLRZ lots1 at the proposed amended density standards for LLRZ D2 (average size 1500m^2). It will contribute to a well-functioning urban environment, meeting the NPS-UD Objective 6(c).

o) Any adverse effects on the environment arising from the proposed rezoning will be minimal, if any, and can be adequately mitigated. A high amenity master planned development is proposed.

p) Significant positive effects arise from the proposed rezoning. It will enable the short term housing demand at Rangiora to be met, and can deliver a housing typology for which there is demand, on lots that are not a burden to the landowners (which is the case for 4ha and the very limited areas of LLRZ D1 with a density of 1-2 hh/ha) and for which there is no provision in the PWDP. At present rates of land uptake there is about 4 years vacant land supply in Rangiora. Given it takes 3-5 years to bring land from zoned state to on the market as developed lots, there is some urgency in providing additional capacity. This proposal helps address an anticipated shortfall in residential zoned plan enabled land.

q) There is no additional cost to the Council in re-zoning the Site as there is expected to be capacity in the public utilities and the existing road network, including planned upgrades.

r) Amendments to PWDP objectives and policies may be necessary to provide for a higher density LLRZ, but of themselves will not act against those relating to Strategic Directions Urban Form and Development and Urban Growth. The PWDP approach to zones and
identification of future development land is already out of step with higher order Resource Management Act 1991 (RMA) statutory documents because they do not give effect to the NPS-UD (and are sought to be amended through this submission).

s) The alternatives of retaining Rural Lifestyle or Large Lot Residential zone across the entire Site are not an efficient use of land which immediately adjoins the urban area of Rangiora, and is highly accessible to the town centre by active transport modes as well as car.

t) The proposed rezoning is consistent with and the most appropriate, efficient and effective means of achieving the purpose of the RMA.

The Site

1. The Site is a 58ha block of land (‘the Site’) accessed from Lehman Road, Rangiora **(Figure 1)**. It is owned by the two submitters and 12 other landowners.

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1 Assumes 20% of land area taken for servicing including roading, reserves and stormwater management if required.

Figure 1: The site (outlined in blue (Google Earth)

2. The Site is surrounded by RLZ land that is used for a mix of lifestyle and conventional farming. To the NE is the Rangiora Eco Holiday Park, and beyond the Park is the Rangiora Racecourse about 300m away from the nearest lot and 1km from the centre of the Site. Land to the south east is GRZ and part of urban Rangiora with newly developing residential land west of West Belt. About 1.9 km to the NW is Rangiora Airfield. About 1km north of the most northern lot is the Ashley River.
3. The southern-most lot in the proposal with the Rangiora Vet Clinic faces, but does not have access to Rangiora-Oxford Road (State Highway 72). This arterial road provides the main road connection in to the centre of the town. The well-established Fernside Rural residential area is about 2.5km west from the junction of Lehmans and Rangiora-Oxford Roads.

Figure 2: the site is a broader context (Site marked red)

4. The Site is not identified as lying within a preferred growth direction for Rangiora in the Waimakariri 2048 District Development Strategy (2018) (**WDDS**) **(Figure 3)**. No land west of Lehmans Road is included in the West Rangiora Development Area (**DEV-WR**) in the PWDP.

Figure 3: Figure 11 WDDS

5. The Council reviewed its strategic approach to the location and provision of Rural Residential land (now zoned LLRZ in the PWDP) in the WDSS. It adopted the position that it would:

a) Explore tools such as cluster development to manage rural character

b) For rural residential development, adopt an approach that has a primary focus on creating new rural residential areas, with a secondary focus on enabling large lot intensification within existing rural residential areas where there is sufficient community support and servicing available

c) Review the Rural Residential Development Plan for the whole District (pg 21 WDDS).

6. Rangiora presently has a population of 17,841 (2018 Census). It grew steadily between 2006 and 2018. Growth of Rangiora since then has continued in step with the district growth which has increased 8.2% between 2018 and 2021 from 61,300 to 66,300 at an annual average of 2.8% from 2018 to 2020 (Statistics NZ Subnational population projections at 30 June 2021: provisional).

2006 (count)	2013 (count)	2018 (count)
12,165	15,069	17,841

Statistics NZ

Population projections at 30 June

PLANNING STATUS OF THE SITE

Chapter 6 of the Canterbury Regional Policy Statement

7. An assessment of the CRPS is set out in **Appendix 1** to this submission.
8. The Site is within the Greater Christchurch area.
9. It was not shown as a Greenfield Priority Area – Residential (GPA) on Map A of the Canterbury Regional Policy Statement (CRPS). The GPA terminates at Lehmans Road.
10. As a result of the Minister for the Environment's decision of 28 May 2021 on Change 1 to Chapter 6, an area largely south of Oxford Road and a finger of land to the north of Oxford Road was included as a Future Development Area (**FDA**) (**Figure 4** orange).

Figure 4: Map A Chapter 6 Regional Policy Statement Greenfield Priority areas
Site location identified with red circle (appx)

11. The FDAs are intended to accommodate the increased demand for new dwellings in that part of Waimakariri District within the Greater Christchurch Urban Area and to respond to the NPS-UD. They do not provide "plan enabled" land as they need to negotiate a rezoning process to confirm their status as land developable for housing and other urban purposes.
12. The proposal for a LLRZ zone with average lot sizes of 1500m2 is inconsistent with the policy approach of Chapter 6 for Greater Christchurch, in that if fits none of the residential living typologies provided for in Chapter 6 and is not in a location identified for urban or rural residential development. It sits 'between' the urban and rural residential densities provided for in the CRPS (minimum 10 hh/ha for urban in Waimakariri, and average 1-2 hh/ha for rural residential). The proposed density is appx. 6.66 hh/ha.
13. Notwithstanding, the proposal meets all the location and other criteria in CRPS Policy 6.3.9 for rural residential development. It is:

- Outside the CIAL noise contours
- Has some sites with restrictions from the take-off and landing vectors for Rangiora Airfield but not such as to impact its operational capacity.
- Is outside the groundwater protection zone
- Is not within the Waimakariri stop bank system
- Has no views of or to the Port Hills
- Has good access for emergency services
- Will not create reverse sensitivity issues with adjoining land uses; Rangiora Racecourse is 500m away.
- Free of significant natural hazards and is a flat site.
- Supports no significant natural values or ecological values.
- Contains no SASMs.
- Can be integrated into or consolidated with the existing urban area of west Rangiora.
- Contains no surface water bodies so there will be no adverse impacts on these.
- The development will be contingent on an ODP to provide integrated design for subdivision and land use, and provide for the long-term maintenance of a high quality high density rural residential character.
- The proposal is not intended as a staged development towards full urban; rather it is intended to provide a unique residential environment that can stand alone and contribute to the urban fabric of Rangiora like Palmview in east Rangiora, or as Kaiapoi Lakes does for Kaiapoi.

14. Overall, the proposal is not consistent with Chapter 6 but that is more a function of its original purpose when formulated in 2013. Notwithstanding that, the submission for a lower density residential focussed, high quality urban environment that attaches to an existing urban area and that promotes a coordinated pattern of development has planning merit.

Operative Waimakariri District Plan
15. The Site is zoned Rural in the Operative Plan. The minimum lot size for subdivision and a dwelling is 4 ha.
Proposed Waimakariri District Plan
16. The Site is zoned Rural Lifestyle Zone **(LRZ) (Figure 4).** The minimum lot size for subdivision and a dwelling in the LRZ is 4 ha.
17. Oxford Road is a strategic road and Lehmans Road is a collector road.

Figure 5: Proposed District Plan Zoning (site outlined in red)

18. The Site is also subject to, or potentially influenced by, a number of Overlays:
    a) Rangiora Airfield Take Off Climb and Approach Obstacle Limitation Surface (**Figure 6**)
    b) National Grid Transmission Lines (**Figure 6**)
    c) Liquefaction: Liquefaction damage is unlikely (**Figure 6**)
    d) Non-Urban Flood Assessment Area (**Figure 7**)
    e) Geographic areas: Ecological Area – Plains

f) Ecological District – Low Plains

Figure 6: Rangiora Airfield Take-off and Approach vectors (blue dashed lines); Liquefaction damage unlikely (green)Transmission lines (green lines); Site outlined in red

Figure 7: Non-urban flood assessment & Waimakariri Flood Hazard maps
Blue – medium risk, green – low risk, white – very low

DEVELOPMENT PROPOSAL AND PROPOSED REZONING

19. Subdivision of the Site will create approximately 311 LLRZ D2 lots.
20. The key design drivers for the proposal are:

a) A high amenity premier residential zone with large houses on large sites – average 1500m^2, min 1000m$_2$ based on the St Kilda, Hamilton development concept (**Figure 8**).

b) LLRZ D2 standards would enable a lower density zone in the medium term e.g. 10 years to achieve a high quality consistent character subdivision. If developed as an integrated development subject to an ODP subdivision can be staged for to the proposal.

c) Creating strong connections with the immediate neighbourhood by providing a cohesive interconnected roading layout that picks up direct links to the eastern neighbourhood off Lehmans Road and the northern subdivision roading, and carries them into the Site.

d) Creating a high amenity and diverse residential neighbourhood by providing interfaces to roads, reserves and rural environments.

e) Respecting and building on local identity and character of Rangiora by retaining specific vegetation features from the Site, and anchoring the development into the wider landscape.

21. A development concept can provide for sound urban design by:

a) A hierarchy of movement corridors.

b) Prioritisation of walking and cycling.

c) A north-south alignment of street blocks to maximize solar access and provide for efficient use of lots.

d) Block perimeters being kept as small as practicable to aid permeability and higher public amenity.

e) Enabling a range of housing typologies set in high quality landscape and street setting with generous amenity plantings and curtilage.

Figure 8: St Kilda development images (Bayleys)

22. St Kilda, Cambridge is a premier development on the outskirts of Cambridge, centrally located and with easy access to the Waikato Expressway. It was originally part of a small dairy operation which was dissected by the Waikato Expressway, leaving a portion within the Cambridge Town boundary and the larger balance of the property of approximately 80 ha (which became St Kilda) on the Eastern side of the Expressway, left in the Rural Zone.
23. The initial development concepts were for a Rural Residential type development given the Expressway separation of the existing residential development on the Western side of the Cambridge Bypass, however this was not supported by Council and a new concept of larger residential sections of a 1600m² average size was developed and approved – see https://www.stkilda.nz/page/location/

EFFECTS ON THE ENVIRONMENT

Township growth and urban form

24. The Site immediately adjoins the western edge of urban Rangiora.
25. The WDDS indicated a general preference for the direction of urban growth of Rangiora to the east as a way of balancing up the residential areas around the town centre and some growth to the west.
26. The approach of the WDDS was to signal growth options to be confirmed in the District Plan Review:

The broad directions for greenfield residential growth for the District's main towns are set out in Figures 11 to 14. Further work will be carried out to identify and confirm the exact locations and extent of these residential growth areas, together with the intensification opportunities within existing urban areas. These will be enabled through the District Plan Review and other planning tools.

27. The Strategic Planning documents clearly signal active consideration of growth needs and growth directions. The options available to the Council were constrained by the approach of the CRPS as the District Plan has to give effect to the CRPS and cannot be
inconsistent with it. The CRPS took effect in 2013 and is overdue for review.
28. The CRPS tightly holds urban growth to the constraints of Map A Chapter 6 and the identified FDAs which although amended by Plan Change 1 in 2020 does not respond to the directions of the NPS-UD. In any event the approach is focused on the need for housing in full urban residential land, less on other residential development forms.
29. As such the Site falls outside the planning policy framework for urban growth. However, in terms of urban form and on the ground, there is considerable merit and logic to conversion of this existing LRZ land to a new high amenity residential form that can be integrated into the Rangiora urban fabric.
30. The proposal has the potential to anticipate the longer term growth path confirmed by the decisions on the RRS to protect the future growth option of more intensive urban development in this direction. It can set a pathway to further westward expansion on land
that holds few if any physical barriers to land development.
31. The proposal will contribute to the housing needs of Rangiora and in a form and location that does not undermine the long run urban form of Rangiora. Planned growth confirmed in the PWDP is already intended to extend westwards out to Lehmans Road and to keep the town edge squared up providing depth to future development and providing a rational basis for providing movement networks driven off the key roads such as Rangiora-Oxford Roads. The West Rangiora Future Development Area confirms this approach. The Site sits in the next block west of Lehmans Road so is not proposing a disjointed urban form, nor one that is not part of the long term thinking of urban form and growth for Rangiora.

32. A full residential zoning is proposed under LLRZ D2 and will provide a high quality street character, overall amenity and passive surveillance over the street, and will create the correct lighting standards, roading standard, fully formed footpaths and cycleways required for a high quality urban environment.

Neighbourhood and wider community effects
33. The Site is serviced by a collector road and is close to an arterial road. This provides for ease of access and safe and convenient movement to and from the Site. A planned development co-ordinated by an ODP can facilitate within the site movement corridors and linkages through the Site to provide for walking and cycling.
34. A key positive neighbourhood and community effect will arise from the existing dwellings and their established gardens and plantings that will anchor new development and provide a point of reference for new dwellings. Development will not be on a bare site; it will take place in an existing established part-residential setting. The transition to a low density, high quality premier residential development will start from a favourable position and minimise the apparent extent and nature of the landscape change.
35. The Site is comparatively large (58.4 ha) and has the potential to support a variety of residential building typologies and this will contribute to a mix of households within the development and provide built form variety and interest in the streetscape. Whilst LLR D2 standards are proposed, it may be that part of the Site is suitable for other higher density forms of development, which would be within scope of the alternative relief, and could be considered as part of the master planning process required for preparation of an ODP (ahead of the hearing). The earlier stages of the St Kilda development were for large lot residential, with more clusters of townhouses included as later stages (and a retirement village). A retirement village is unlikely in this case, given the proximity of the Charles Upham Retirement Village.
36. Rangiora is well-positioned to accommodate and service the needs of a fast-growing resident population that will in turn support more business activity, schools, community facilities and community organisations.

Effects on tangata whenua values
37. The Proposed District Plan does not identify any Sites and Areas of Significance to Maori in the Site, but the nearby Rakahuri/Ashely River identified as SASM-025. This has been scheduled as being
River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species
38. The PWDP has Policy SASM-P8 which is relevant to pre-development processes:
Engagement with rūnanga
Te Ngāi Tūāhuriri Rūnanga and the District Council to encourage engagement with the Rūnanga priorto persons undertaking activities and/or applying for resource consent where the activity has thepotential to adversely affect identified sites or areas of Ngāi Tūāhuriri cultural significance. Where priorengagement with Te Ngāi Tūāhuriri Rūnanga h as not been undertaken by an applicant for an activitythat has the potential to adversely affect an identified site, the District Council will consult with the Rūnanga.
39. The Site is not listed as an archaeological site on the NZ Archaeological Site database.

Landscape and visual effects
40. Rural Lifestyle style development exists on the Site now (a series of 4 ha lots with a dwelling and associated accessory buildings on each). The landscape is dominated by shelter belts, utility buildings, significant trees and planted curtilages around

dwellings many of which are well set back off the roads down RoWs.
41. An ODP will help to achieve an integrated, cohesive and coherent development The proposal will lead to a modification of the landscape of the Site from a predominantly lifestyle block landscape to a denser semi-urban environment dominated by residential building that will, in time, get the benefit of street tree and reserve plantings and landscape treatments around the houses.
42. The visual effects which will arise from a change in the number of vegetative and built elements in the landscape are significant, but not avoidable, if the Site is to contribute to the on-going growth of Rangiora. The change will contribute to a high quality amenity and quality of environment and one that will be entirely consistent with and supportive of the rural lifestyle residential development that has successfully established on the Site.

Well-functioning urban environments
43. The Site adjoins the existing built up urban area of Rangiora. Immediately to the east are existing or developing residential areas.
44. The conversion of the Site from present rural lifestyle uses to low density, high quality residential will continue a pattern of outward expansion of Rangiora. Such a change may not be consistent with the PWDP's identification of a Future Development Overlay for west Rangiora only as far west as Lehmans Road, but on the ground it will look and integrate as part of the urban fabric.
45. It will provide some replacement lower density living areas for the existing LLR zones at north west Rangiora – but at much more appropriate higher density that the LLR D1 standard which is 1-2 hh/ha. There are two such areas, shown on the planning maps below. River Road has an 'urban overlay' and is intended to be intensified to urban densities. The land on the opposite (east) side of Lehmans Road is a 'legacy' rural residential zoning which applies under the Operative District Plan. The landowners have developed the adjoining residential subdivision and wish to develop the land for full urban residential development. Services are in place to support this. The constraint to date has been Map A of the CRPS which does not include the land as a Greenfield Priority Area or Future Development Area, GR zoning of this land is consistent with the NPS-UD.

Figure 9: PWDP as notified – LLRZs shown in light grey. Diagonal stripes – urban growth overlay.
Site outlined in red.
46. Rangiora is growing apace. It is attracting significant interest from new home buyers as people respond to the significant investment in upgraded transport links (Northern Corridor and public transport) and a growing economic base for employment within the District and the City.
47. Rangiora has excellent connectivity to the City, both via the new Northern Corridor, and a nascent cycleway link into the City. There is a very regular bus service every half hour.(the No 1 Blue Line) The standard trip takes 70 minutes, and there is a twice daily weekday morning express service from Rangiora, and seven times weekday express out to Rangiora all via Kaiapoi.
48. The Site will step out the western edge of Rangiora, but as it exists in a peri-urban form now, such a change does not alter how the Site interacts with Rangiora as a whole. It is in many ways a functional part of urban Rangiora now; it's only the Zone boundaries and policy framework that create the sense of it not being part of Rangiora.
49. The Site is convenient to the Rakihura/ Ashley recreation trails, the racecourse, Arlington Park, and the airfield. The town centre is easily accessible.
50. The following assessment of the criteria in the NPS-UD for determining a well-functioning urban environment shows that the proposed rezoning will deliver urban, housing and residential outcomes that meet those criteria. There will be a variety of homes enabled by generous lot sizes. The Site is well-positioned, building as it does on an existing township well-serviced by public transport and cycling options, to provide good accessibility to jobs, community services, and open spaces, as well as mitigating climate change impacts and future natural hazards by being not near the coast and well removed from major rivers.

NPS-UD Policy 1

Planning decisions contribute to well functioning urban environments, which are urban environments that, as a minimum:	**Assessment**

(a) have or enable a variety of homes that: (i) meet the needs, in terms of type, price, and location, of different households; and (ii) enable Māori to express their cultural traditions and norms;	The proposal is to have larger lots supporting predominantly standalone dwellings and associated accessory buildings (including generous sized garaging) in an open landscaped garden setting. This will fill a gap in the range of housing typologies available at Rangiora and contribute to a better functioning urban environment overall at Rangiora. It is not necessary for each individual rezoning proposal to have a wide range of housing typologies, and in some circumstances this may not be appropriate. The rezoning will deliver a premier high amenity urban subdivision with generous sized lots which will complement existing and planned higher density residential development at west Rangiora. There is scope with the relief sought for a mix of residential densities. The appropriateness of this can be considered at the master planning/ODP stage. The Site has the potential to create a unique urban environment in Rangiora. It can follow the example of Palmview based on a lake or Kaiapoi Likes providing a niche housing option in Rangiora and the District meeting a need for residential land not constrained to GRZ standards.
(b) N/A business sectors	
(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and	The Site has access to a collector road and a strategic road providing easy access to key community amenities and facilities. The town is served by a public bus route to the city, and a cycle trail connecting to Kaiapoi and the City. The new West Rangiora Development Area adjoins the Site to the south. The Site will become closer to Rangiora public transport routes as they extend out to service this new growth area over time. The Site is in walking distance to Arlington Park and the Rakahuri/Ashley which contains abundant recreations pace. It is easily accessible to the town centre and within walking distance to the Huntingdon Drive local centre.
(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and	The demand for housing and land in Rangiora is largely ahead of the planning means to respond. This proposal will “top up” the land presently set aside in the PWDP and provide a useful buffer to demand. The Site owners have been keen to release this land for more intense development for some time; there is no prospect of land banking.
(e) support reductions in greenhouse gas emissions; and	The Site has significant advantages in being easily accessible to the town centre and reserves, community facilities and schools. The proposal retains a consolidated form to Rangiora with good connectivity and linkages to recreation space and commercial centres reducing the need for car travel.
(f) are resilient to the likely current and	The Site is within the area of influence of a major river but the non-urban flood assessment maps do not show extensive flooding likely at the Site.

future effects of climate change	Being inland it is not at risk from climate change induced extreme natural hazard events like sea level rise. or river flooding.

Effects on ecosystems and habitats

51. The Site is currently used for a mix of low intensity (grazing) farming, and lifestyle purposes. Shelter belts and utility buildings have been established

52. The Site has been identified in the PWDP with two ecological overlays (the PWDP ecological overlay – Plains and Low Plains Ecological District). They are a district-wide overlays and no specific ecological values have been identified in the Proposed Waimakariri District Plan. These overlays seek primarily to retain indigenous vegetation. The PWDP identifies SASM 025 nearby the Site. That is a Site and Area of Significance to Maori and in SASM - Schedule 1 is identified as *being River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species.*

Effects on natural and physical resources

53. The Site drains in a SE direction towards the newly developing residential area.

54. There will be a degree of site disturbance as part of creating the roading network, and reserves, and as part of curtilage development on each lot.

55. The proposed use for residential activity inevitably leads to loss of some rural productive potential as land owner intentions are not about farming or productive use of the land, but lifestyle use and enjoyment. Built forms and hard surfaces become more dominant.

56. The Site comprises 4ha bocks now and these are not able to be used effectively for productive purposes other than for intensive productions based on tunnel housing and other supported production systems. None exist in the Site now.

57. The Site contains Class 2 and Class 3 soils as defined in the NZ Land Use Inventory (Landcare Research) Land Use Capability classes 1-3 **(Figure 10)**. Productive use of these soils other than for low level purposes i.e. grazing, is not feasible given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production).

Figure 10: Site soils: Site outlined in red; (Canterbury Maps)
Class 2 soils: bright green/Class 3 soils: light green;

Discharges of contaminants into the environment

58. There will be no discharges of contaminants into the environment. Wastewater will discharge to the Council's reticulated system.

59. Stormwater discharges will potentially be to ground given ground conditions or to an approved and consented stormwater management and treatment area which will meet all relevant Council standards.

Risks from natural hazards or hazardous installations

60. The PWDP planning maps show the Site as being within a Non-Urban Flood Assessment Area.

61. The District Plan maps do not identify high flood hazard areas or high coastal flood hazard areas, rather these are identified through the flood assessment certification process. This enables the most up-to-date technical information to be used. However, as a guide, areas that are potentially high hazard can be identified through the Waimakariri District Natural Hazards Interactive Viewer (NH - Introduction).

62. Rules that refer to a Flood Assessment Certificate require a certificate to be obtained from the District Council to determine compliance with the relevant rule. The alternative is to apply for resource consent as set out in the rule.

63. Rule NH-R2 states
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;

64. Assessment of flood risk and consequence can be undertaken at subdivision stage.

65. There will be no hazardous installations proposed on the Site.

Geotechnical assessment
66. The PWDP planning maps show the Site as being “Liquefaction damage is unlikely. Standard investigation procedure outlined in NZS3604 is appropriate”.

Contaminated land
67. A Preliminary Site Investigation can be carried out for the Site at subdivision stage.
68. An enquiry of ECAN has identified that two sites at the northern end of the Site potentially contain some contaminated land, which can be investigated further at subdivision stage **(Appendix 6)**. 315 Lehmans Road is an unverified HAIL site (previous use for clay target shooting) and 317 is registered as containing uninvestigated persistent pesticide bulk storage.

Servicing
69. Proposals for servicing the Site and the effects from such servicing in relation to domestic water supply, wastewater, stormwater, roading, and telecommunications will be required for any subdivision consent.

Economic effects
70. It is anticipated that urban development will generate positive economic effects, both from the investigation/development phase and for the longer run economic activity from householders participating in the local economy.

Climate Change effects
71. An assessment of the effects of the proposed rezoning on climate change is included as part of the assessment of a well-functioning urban environment above.
72. A well-functioning urban area that is designed and serviced in an integrated manner, applying sound urban design principles, will enable a reduction in greenhouse gas emissions compared to unplanned, ad hoc development that does not create compact urban forms located where the services and benefits of existing, established urban areas are not readily accessible.
73. There is a triangle of planning influence that can be brought to bear on reducing greenhouse gas emissions
a) Compact urban form minimising distances between homes and work/play options.
b) Proximity of homes to community facilities, services and amenities and business/work areas.
c) Design and provision of movement corridors and linkages that create opportunities other than for vehicles for getting around.
74. The Site of the proposed rezoning:
a) Helps in retaining a compact urban form to Rangiora.
b) Is easily accessible to the town centre and is located convenient to the recreation resources of the nearby Rakahuri/Ashley River, the airfield and racecourse and Arlington Park.
75. Rangiora has excellent connectivity to the City, both via the Northern Motorway, the new Northern Corridor, a cycle way link to Kaiapoi which is linked to the new north city cycle way along the Northern Corridor and a very regular bus service.

Positive effects
76. The proposed rezoning will provide for the continued growth of Rangiora by managing the development through an ODP. The proposal will provide a buffer to on-going high level demand for lots in Rangiora. It will cater for a specific housing need not found in GRZ Zoned land nor LLRZ land. The proposed rezoning is anticipating a form of development that is a much more efficient use of a qualifying site supporting a well-functioning urban area. It is a positive endorsement of Rangiora as a growth node in the District.
77. The benefits derived from a planned ODP approach include facilitating high levels of connectivity, creating community links to identified focal points. The Site is close to recreation facilities. A coordinated and integrated development will provide a distinctive environmental quality and point of difference to the development.
78. The Site adjoins existing and developing residential development on the western edge of Rangiora.
79. From a community well-being perspective, the provision of additional land for residential growth will continue to support the Council’s investment in community infrastructure by maintaining and facilitating growth rates, increasing the rating base and attracting development contributions.

STATUTORY PLANNING ASSESSMENT
80. Submissions must be assessed under the provisions of the RMA, including Part 2 and Section 32 (Requirements for Preparing Evaluation Reports).

National Policy Statements
National Policy Statement on Urban Development Capacity (NPS-UD)

81. The NPS–UD applies to this proposal as it is directed at Tier 1 urban environments, and Tier 1 local authorities which includes Waimakariri District as part of the Christchurch urban environment that is defined in Table 1 of the NPS, and additionally defined as:

any area of land (regardless of size, and irrespective of local authority or statistical boundaries) that: is, or is intended to be, predominantly urban in character; and is, or is intended to be, part of a housing and labour market of at least 10,000 people.

82. The NPS-UD recognises the national significance of:

a) Having well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future; and

b) Providing sufficient development capacity to meet the different needs of people and communities.

83. The NPS outcomes are to be achieved through objectives that address:

a) Planning decisions improving housing affordability by supporting competitive land and development markets.

b) Regional policy statements and district plans enabling more people to live in areas of urban environments near centres or areas with employment opportunities, area well serviced by public transport or a high demand for housing in the area.

c) Urban environments developing and changing over time in response to diverse and changing needs of people, communities and future generations.

d) Local authority decisions on urban development being integrated with infrastructure planning and are strategic over the medium term and long term.

e) Local authority decisions on urban development are responsive particularly for proposals supplying significant development capacity.

f) New Zealand's urban environments support reductions in greenhouse emissions and are resilient to current and future effects of climate change.

84. The key method to achieve these objectives is by development of a Future Development Strategy (FDS). This will set out how the Councils will provide for sufficient development capacity over the next 30 years to meet expected demand. There is no FDS for the greater Christchurch Urban Area that meets the requirements of the NPS-UD.

85. Work on development capacity completed for the NPS - UDC 2016 by the Greater Christchurch Partnership as an Update of the existing Urban Development Strategy (UDS) – Our Space 2019 confirmed what there was a shortage of feasible development capacity for future housing in Waimakariri District for the medium (next 10 years) and long term (10 to 30 years) periods. That assessment is now out of date as it does not address the requirements of the NPS-UD; and rates of take up of land have exceeded projected rates.

86. One of the key changes in the NPS-UD is that local authority decisions on urban development that affects urban environments are responsive, particularly to proposals that would supply significant additional capacity. It also amends the required methodology for housing and business capacity assessments.

87. The current CRPS does not meet the new NPS-UD requirement in relation to proposals for significant additional capacity. Regional councils are required to include criteria in the RPS to determine what plan changes will be treated for the purposes of Policy 8 as adding significantly to development capacity as soon as practicable. ECAN has yet to respond to this requirement.

88. The NPS-UD has immediate effect, so in the meantime, proposals such as this submission must be assessed in the context of the overall intent and purpose of the NPSUD as articulated in the NPS-UD objectives and policies. This includes that NZ has well-functioning environments; provides sufficient development capacity to meet the different needs of people and communities; planning decisions improve housing affordability to contributing to competitive house and land markets; and RMA plans enable more people to live near major employment areas, where there is existing or planned public transport, and where there is high demand for housing.

89. The NPS-UD is the higher order document and its requirements override those of lower order documents where there is a conflict, including regional and district RMA plans.

90. Key objectives and policies in the NPS-UD are assessed here:

NPS-UD Objective/Policy	**Assessment**
Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	The proposed development will further enable Rangiora to sustain itself as a well-functioning urban environment by consolidating the residential area close to the town centre, and provide residential development close to public transport links and existing community and commercial facilities including Huntingdon Drive local centre. The proposal provides choices in the Rangiora housing market and in doing so

Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.	supports housing affordability. Whilst the proposal is for a premier larger lot urban residential development, it is important that all sectors of the market are catered for. This will be more affordable than forcing those wanting large sections out to the much larger and very limited areas of LLR D1 development, or having to purchase 2-3 sections in a standard residential subdivision. There Site is in multiple ownership and the landowners are working together to achieve the rezoning. It will bring more competition into the market by bringing new entrants into the market.
Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply: the area is in or near a centre zone or other area with many employment opportunities the area is well-serviced by existing or planned public transport there is high demand for housing or for business land in the area, relative to other areas within the urban environment.	The CRPS is due for review in 2024 but in the meantime the existing CRPS is not in accordance with the NPS-UD 2020. The proposed rezoning is on the edge of the District's largest centre, which offers a wide range of community and business services, and employment opportunities. It is expected that a proportion of future residents will commute outside the township, but as the township and associated business areas e.g. at Southbrook, continue to grow, this is expected to become proportionally less. Rangiora is well serviced with public transport, there is scope for future mass transit PP, and there is a high demand for housing at Rangiora. The Site adjoins the new West Rangiora Development Area, to the south. Extensions of public transport to service this growth area will be readily accessible to the Site.
Objective 6: Local authority decisions on urban development that affect urban environments are: integrated with infrastructure planning and funding decisions; and strategic over the medium term and long term; and responsive, particularly in relation to proposals that would supply significant development capacity.	Whilst not currently identified as a future growth area in RMA documents, the Site is well placed at the township edge to be serviced by existing infrastructure. Some upgrades may be required, which will be investigated further with Council prior to the hearing. See Policy 8 below for commentary on proposals which supply significant development capacity
Objective 8: New Zealand's urban environments: support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change	The proposal adjoins the existing built up are of Rangiora, close to public transport links. Its excellent accessibility to Christchurch City, substantially enhanced with the new Northern Motorway extensions, means it is now highly accessible to these nearby major employment areas. Travel distances are relatively short, minimising vehicle miles and the potential for greenhouse gas emissions. There is a cycleway link from into Christchurch City, and regular bus services, including an express route. The Site is inland and not subject to natural hazard risks associated with sea level rise arising from climate change.
Policy 1 – Planning decisions for well-functioning urban environments	Assessed at para 41-50
	The proposed rezoning is anticipated to provide sections that will be available for the short term (up to 3 years) and into the medium term (3-10 years) if adopting a more conservative outlook.

Policy 2 - Sufficient development capacity Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.	The locational and amenity advantages of Rangiora also favour strong ongoing demand. The PWDP UFD-O1 Feasible Development Capacity for residential activities identifies the need for 6300 residential units in the period 2018-2028, and 7100 residential units 2028-2048. These numbers are derived from Chapter 6 CRPS Table 6.1. and are out of date. Data from the Council (November 2021) confirms that there are about 800 vacant lots in Rangiora. Building consents are at about 180/year. That means there is about 4 years vacant land supply. A lead in time of 3-5 years is needed to go from rezone to house build so the Council is facing an unnecessary squeeze on land availability. That will translate in to an upward shift in land and section prices as has been the case at Rolleston. The data suggests that the PWDP will be late to the party to ensure there is at least sufficient development capacity to meet expected demand for housing land over the short term, medium term, and long term. There is a looming, inevitable land supply issue so any proposal to add capacity will push the Council closer to meeting the requirements of the NPS-UD. The proposal is consistent with ensuring there is at least sufficient land supply for housing.
Policy 8 – Responsiveness to plan changes Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is: (a) unanticipated by RMA planning documents; or (b) out-of-sequence with planned land release	The proposed rezoning is not anticipated by RMA documents - it is not a Greenfield Priority or Future Development Area in the CRPS, or a New Development area in the PWDP. A responsive approach to the proposal is required as it meets the Policy 8 criteria for unanticipated zoning. It will contribution to well functioning urban environments and will add significant development capacity. There is no development capacity for the housing typology proposed – so any provision is significant in this context. The development will deliver appx 311 high amenity large lot residential sites at an average density of 1500m2. This will be higher if a mix of densities are proposed, which may be appropriate in some parts of the Site, dependent on master planning work to follow.

91. Adopting the submission to re-zone the land, and enable the proposed development on the submission Site will satisfy the objectives and policies of the NPS-UD.

Proposed National Policy Statement for Highly Productive Land (NPS-HPL)

92. The Government proposed in 2019 a NPS-HPL to prevent the loss of productive land and promote its sustainable management. The overall purpose of the proposed NPS-HPL is to improve the way highly-productive land is managed under the Resource Management Act 1991 (RMA) to:

a) Recognise the full range of values and benefits associated with its use for primary production
b) Maintain its availability for primary production for future generations
c) Protect it from inappropriate subdivision, use, and development.

93. The NPS-HPL is still a proposal and not intended to take effect until after Gazettal. At the date of this submission the NPS-HPL has no effect and no assessment of it is required for the purposes of this submission.

94. The Proposed NPS-HPL interim definition of HPL is land defined as Land Use Capability Class 1-3 soils. A portion of the Site contains Class 2 and 3 soils (see **Figure 10)**. Highly productive use of these soils is not realistic given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production). Its present use as lifestyle blocks, low level grazing and agistment is the more likely long run use of the Site if not rezoned.

95. Objective 3 of the Proposed NPS-HPL specifically refers to highly productive soils being protected by avoiding *"uncoordinated urban expansion on highly productive land that has not been subject to a strategic planning process"*.

The Site was assessed through a strategic planning process (WDDS 2018) and the RRS as a preferred site for LLRZ development, and rejected for a change in zoning on the basis that it may be required for long term urban growth of Rangiora.
96. It is therefore considered that this submission to re-zone the Site is largely in accordance with the Proposed NPS-HPL.

National Planning Standards

97. The National Planning standards prescribe various matters under the RMA so that there is consistency among planning documents most relevantly here in terms of appellations for zones, and the standards applying to these zones.
98. The proposed rezoning adopts the standard zone appellation, in this case LLRZ as contained in the PWDP.
99. The PWDP identifies plan standards for minimum and average net site areas for the respective zones. These are modified for the proposed rezoning as a higher density LLRZ.
100. The higher density LLR zoning is entirely consistent with the NPS purpose for the LLRZ as reproduced below. In this case, the principal constraint to more intensive development is the peri-urban location where a lower density transition to the rural environment is appropriate (particularly noting that the zone boundary is 'mid block' so there is no natural or physical buffer between rural and residential areas); the existing pattern of 4 ha lots with existing substantial homes and gardens; and the fact that the premier large lot subdivision proposed relies on consistency of housing quality and character to be deliver on this vision for the area.

Large lot residential zone

Areas used predominantly for residential activities and buildings such as detached houses on lots larger than those of the Low density residential and General residential zones, and where there are particular landscape characteristics, physical limitations or other constraints to more intensive development.

Low density residential zone

Areas used predominantly for residential activities and buildings consistent with a suburban scale and subdivision pattern, such as one to two storey houses with yards and landscaping, and other compatible activities.[2]

Canterbury Regional Policy Statement 2013 (CRPS)

101. Chapter 6 of the RPS *"provides a resource management framework for the recovery of Greater Christchurch, to enable and support recovery and rebuilding, including restoration and enhancement, for the area through to 2028. Recovery in Greater Christchurch is also supported by the provisions in Chapter 5 notated as 'Entire Region'. The provisions in the remainder of the RPS also apply.3"*
102. An assessment of the proposed rezoning against the relevant CRPS Objectives and Policies is set out in **Appendix 1**. This should be read in the context of the CRPS being overdue for review and that it does not provide a regional response to the NPS-UD. The
need to focus on earthquake recovery has now passed and so many of the directive provisions need to be given appropriate 'weight' in a new national policy environment with a focus on flexible, responsive panning approaches that better provide for people's needs and well-being.
103. That assessment shows that

a) The development proposal achieves the objectives for the location, design and function of new developments (Objective 5.2.1)

b) The traffic effects of the proposal are unlikely to give rise to adverse effects and so achieves CRPS objectives for the strategic land transport network (Policy 5.3.7)

c) The Site falls outside the FDAs shown on Map A of Chapter 6 and in that regard is inconsistent with RPS Policy 6.2.1 clauses 1 to 3.

1. identifies priority areas for urban development within Greater Christchurch;

2. identifies Key Activity Centres which provide a focus for high quality, and, where appropriate, mixed-use development that incorporates the principles of good urban design;

3. avoids urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS

d) The environmental effects assessment outlined above establish that the proposed development is consistent and will not give rise to any concerns with respect to all the matters listed in RPS Policy 6.2.1 clauses 4. to 11. These matters are:

6.2.1 Recovery framework

Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that:

1. As above;

2. As above;

3. As above;

4. protects outstanding natural features and landscapes including those within the Port Hills from inappropriate subdivision, use and development;

5. protects and enhances indigenous biodiversity and public space;
6. maintains or improves the quantity and quality of water in groundwater aquifers and surface waterbodies, and quality of ambient air;
7. maintains the character and amenity of rural areas and settlements;
8. protects people from unacceptable risk from natural hazards and the effects of sea-level rise;
9. integrates strategic and other infrastructure and services with land use development;
10. achieves development that does not adversely affect the efficient operation, use, development, appropriate upgrade, and future planning of strategic infrastructure and freight hubs;
11. optimises use of existing infrastructure; and
12. N/A

e) The proposed rezoning achieves policies relating to:
- Sustainability;
- Integration of transport infrastructure and land use;
- Urban design; and
- Biodiversity, natural hazards, landscape, soils, contaminated land.

104. In terms of the CRPS polices for rural residential developments (Policy 6.3.9) the proposal sits square with all policy matters other than being a location identified in an adopted Rural Residential Strategy; and being at a higher density than provided for under this policy (ie greater than 1-2 hh/ha). As such it has a majority of features entirely consistent with the policy.
105. The CRPS includes housing capacity targets as below

6.2.1a Targets for sufficient, feasible development capacity for housing [inserted in accordance with sections 55(2) and 55(A) of the Resource Management Act 1991, from the National Policy Statement on Urban Development Capacity 2016]
For the period 2018-2048, sufficient, feasible development capacity for housing is enabled in Greater Christchurch in accordance with Table 6.1.
Table 6.1 Targets for housing development capacity in Greater Christchurch, 2018-2048

106. These derive from Our Space, under the requirements of the then NPS-Urban Development Capacity 2016, since replaced by the NPS-UD 2020. The targets (known as bottomlines in the NPS-UD) are to be treated as 'minimums' not 'maximums'.
Policy 6.3.12
enables urban development in the Rangiora and Kaiapoi FDAs (new Development Areas in the PWDP) where needed to meet the medium term targets. This a 'minimum' allocation approach contrary to the NPS-UD. The NPS-UD favours over allocation, including in locations unanticipated by RMA plans, where it will add additional development capacity, can be integrated with infrastructure planning and funding, and will contribute to well functioning urban environments – as is the case the proposed Lehmans LLR D2 zone.
107. The proposed Lehmans LLR D2 zone is consistent with the CRPS except with respect to those parts of the CRPS which are out of step with and do not give effect to the higher order plan, the NPS-UD.

Proposed Waimakariri District Plan
108. An assessment of this proposal against the relevant PWDP Objectives and Policies for urban growth and development as notified on 17 September 2021 is set out in **Appendix 2.**
109. That assessment shows that the proposed rezoning is entirely consistent with the relevant objectives and policies, including as sought to be amended by this submission. Those amendments are to UFD-P3 Identification/location and extension of Large Lot Residential Zone areas; and LLRZ-O1 and LLRZ- P1-5 and reflect the intent and outcomes intended for the proposed LLRZ D2 zone, which is a higher density LLRZ zone than the PWDP LLRZ zone (renamed LLRZ D1 in this submission).

ASSESSMENT AGAINST OTHER PLANNING DOCUMENTS
Our Space 2018-2048 Greater Christchurch Settlement Update (2019)
110. Our Space is a non-statutory document prepared under the Local Government Act. It
"responds to the new Government Policy Statement on Land Transport, which has increased funding for mass public transit schemes, and meets the requirement of the National Policy Statement on Urban Development Capacity (NPS-UDC) 2016 to prepare a
future development strategy…. Specifically, it:
• sets out how targets for housing for the next 30 years will be met, accommodating an additional 150,000 people;
• identifies locations for housing growth, encouraging Central City and suburban centre living while providing for township growth in Rolleston, Rangiora and Kaiapoi;…

• *promotes a compact urban form, which provides for efficient transport and locates development in a manner that takes into account climate change and sea level rise.[4].*

..Underpinning this settlement pattern approach is the vision for a transformation of the transport network that fosters much greater public and active transport usage, and reduced reliance on the private vehicle.

111. Our Space acknowledges that this will require commitment from the Government to invest in the necessary improvements to our transport system, which could include investing in rapid transit services. To date, there has been no successful business case for improved public transportation, including not as a Covid 19 fast track infrastructure project.

112. The Our Space housing capacity targets (Table 3) and Future Development Areas are related to growth of urban areas.

113. Our Space, like the CRPS (and the Operative District Plan) are now out of date, as they do not reflect or give effect to the new requirements of the NPS-UD.

Waimakariri 2048 District Development Strategy (WDDS)

114. The preferred growth directions for Rangiora in the WDDS 2048 (2018) are outlined above (under 'Site') i.e. westwards to Lehmans Road, and otherwise eastwards. However, the Council in its decision on the RRS, recognized west of Lehmmans Road as a potential longer town urban growth area.

115. The WDDS Rangiora Snapshot (pp38-39) -when looking ahead to 2048 proposed that:

a) Rangiora remains the District's largest town
b) 30,000 – estimated population (2048)
c) 12,025 – estimated households
d) 5,025 - new households in Rangiora
e) Continues to accommodate one third of the District's residential growth
f) 167 – estimated annual building consents for new dwellings for the next 30 years
g) 423 hectares of additional feasible residential land required by 2048 (this includes capacity in remaining stages of existing residential developments as well as new greenfield areas inside and outside of the Infrastructure Boundary)
h) Future residential growth directions proposed to the east (predominantly) and west of the current town
i) Opportunities for intensification/regeneration to be identified
j) New growth directions take into account areas of unacceptable natural hazard risk and areas of significant environmental and cultural values
k) New growth areas to connect into existing sewer and water networks
l) Stormwater Levels of Service designed to meet increased performance requirements

116. At the 2018 Census Rangiora had a population of 17,841, and 7314 total dwellings (incl those unoccupied and under construction). Population projections for the District show an average annual change 2018-2020 of 1700 persons. If Rangiora continues to attract a third of all district growth as stated in the WDSS then Rangiora's population in 2021 will be around 18,900.

Mahaanui Iwi Management Plan

117. Part 1 of the PWDP in a section "Mana Whenua" sets out the position with respect to iwi and the review of the district Plan:

a) The District's territorial area sits within the takiwā (territory) of Ngāi Tūāhuriri which is one of eighteen Ngāi Tahu regional papatipu rūnanga, constituted under the ***Te Rūnanga o Ngāi Tahu Act 1996*** *to represent* ***mana whenua*** *interests.*

b) The preparation and change of a district plan must take into account relevant iwi documents. For the District, Ngāi Tahu has set out its resource management values, issues, objectives and policies within the Mahaanui Iwi Management Plan (2013).

c) The Mahaanui Iwi Management Plan identifies objectives, issues and policies for natural resource and environmental management for six pāpatipu rūnanga (including Te Ngāi Tūāhuriri Rūnanga). It seeks to ensure that the taonga and resources of Ngāi

Tahu mana whenua are recognised and protected in the decision-making of statutory agencies. The Mahaanui Iwi Management Plan contains a comprehensive suite of policies and objectives addressing the range of resource management matters of significance to tangata whenua. The District Council shall have regard to the Mahaanui Iwi Management Plan when preparing or changing the District Plan, to the extent its content has a bearing on resource management issues of the District.

118. The Mahaanui Iwi Management Plan (MIMP) 2013 was released on 1 March 2013.

119. The MIMP is a tool for tangata whenua to express their identity as manawhenua and their objectives as kaitiaki, to protect their taonga and resources, and their relationships with these. The MIMP seeks to ensure that these taonga and resources are recognised and protected in the decision-making of agencies with statutory responsibilities to tangata whenua. Importantly it is also a tool

that assists Papatipu Rūnanga representatives to articulate their values, issues and policy into statutory processes.
120. The MIMP includes both general objectives and policies about the management of land, air, and water, and also includes catchment specific objectives and policies.
121. Section 5.3 Wai Maori (pp77-98) contains an extensive discussion about tangata whenua rights and interests in freshwater. It provides a suite of Issues, Objectives and Policies for freshwater
122. Section 5.4 Papatuanuku (pp101-124) sets out the Ngai Tahu Subdivision and Development Guidelines that are to be read along-side objectives relating to:

a) Land use planning and management in the takiwā reflects the principle of Ki Uta Ki Tai. (from the mountains to the sea)

b) Rural and urban land use occurs in a manner that is consistent with land capability, the assimilative capacity of catchments and the limits and availability of water resources.

c) Inappropriate land use practices that have a significant and unacceptable effect on water quality and quantity are discontinued.

d) Ngāi Tahu has a prominent and influential role in urban planning and development.

e) Subdivision and development activities implement low impact, innovative and sustainable solutions to water, stormwater, waste and energy issues.

123. Section 5.5 Tane (pp127-137) includes objectives that focus on:

a) Regional policy, planning and decision making in the takiwā reflects the particular interest of Ngāi Tahu in indigenous biodiversity protection, and the importance of mahinga kai to Ngāi Tahu culture and traditions.

b) The customary right of Ngāi Tahu to engage in mahinga kai activity is recognised, protected and enhanced…

c) Customary use, and therefore mahinga kai, is given effect to as a first order priority for freshwater management in the takiwā.

124. Section 6.4 (pp213-224) addresses issues of particular significance to the lands and waters of the Waimakariri catchment within which the Site lies.
125. Relevant Objectives relating to urban development of land in that catchment include:

a) The natural “energy, vitality and life” of the Waimakariri River as a braided river is protected and restored.

b) The discharge of contaminants to the Waimakariri and its tributaries is eliminated.

c) Water quality and flows in the Waimakariri and its tributaries are improved to enable whānau and the wider community to have places they can go to swim and fish.

d) The mauri and mahinga kai values of the Waimakariri and its tributaries and associated springs, wetlands and lagoons are protected and restored; mō tātou, ā, mō kā uri ā muri ake nei.

126. A key issue relating to subdivision and development is that subdivision and development activities in the lower catchment have the potential to adversely affect Ngāi Tahu values such as waterways, mahinga kai and sites of significance (Issue Wai4).
127. The proposal provides for full urban reticulation of the three waters and is consistent with the objectives and policies contained in Chapters 5.3 and 5.4 of the MIMP. The proposal does not preclude individual land owners from installing rainwater collection and use from roof areas at the time of building development.
128. The proposal has been designed taking into consideration the potential effect of resultant subdivision and development on the rivers and streams that flow into the lowland rivers.
129. Overall it is considered that the proposal will not have adverse impact on the cultural values of iwi as set out within the MIMP.

SECTION 32 ASSESSMENT

130. A Section 32 assessment is contained in **Appendix 3.**
131. In summary, the PWDP zoning and associated rules (RLZ Zone with a minimum lot size for subdivision and a dwelling 4ha) do not meet the needs and aspirations of the current owners.
132. Strategic Council planning documents (specifically the WDDS) have a focus on only meeting urban growth demands within urban environments of existing towns. They favour intensification (15hh/ha) and a strict allocation of capacity by development areas. It is a control and command regime consistent with Map A of Chapter 6 of the CRPS but is out of step with the requirements of the NPS-UD which requires a more flexible, responsive approach, prohibits a hard fixed unmoveable urban/rural boundary.
133. This approach leaves little room for new proposals or proposals that do not sit square with the standard array of GRZ/medium density or SETZ (Settlement Zone). SETZ applies to some of the District’s smaller settlements outside Greater Christchurch.
134. Neither LRZ nor Large Lot Residential (LLRZ) as notified in the PWDP is an efficient use of this block of land located as it is immediately adjoining the urban area of Rangiora, and in a location easily accessible to the town centre by active transport modes as well as car and several district reserves.
135. If this Site is not zoned for LLRZ D2 (minimum average lot size 1500m^2) use to enable residential re-development then it will drive pressure to re-zone elsewhere. That step potentially will not have the significant benefits to Rangiora long term in relation to enabling a well-functioning urban environment that enables people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future. Additionally re-zoning to LLRZ D2 will contribute to providing additional development capacity to meet the different needs of people and communities in a planned manner and

consistent with the NPS-UD.
136. The Site can readily be developed to reflect the principles of the Urban Design Protocol with values of character, context, and connectivity.
137. The Section 32 assessment concludes that the proposal to re-zone the Site from LRZ zone to LLRZ D2 Zone (average lot size 1500m$_2$) is the most appropriate method for achieving the objectives of the proposal, than the other alternatives considered.
138. Option 2 identified in the s 32 assessment is consistent with some PWDP policies notwithstanding that it does sit square with the strategic intentions signaled in the WDDS and the PWDP approach to providing for development capacity and urban development.
139. Option 2 identified in the s 32 assessment to re-zone the Site is the most appropriate given:

a) The proposals adopt the PWDP zones, development and activity standards with appropriate amendments. This ensures continuity of the District Plan anticipated environmental outcomes and urban amenity for Rangiora and adjoining residential areas;

b) Will be consistent with and give effect to many of the relevant PWDP objectives and policies;

c) It is a logical extension to the developed and developing residential land adjoining the Site while achieving a compact, efficient urban form that removes pressure on isolated rural land elsewhere around Rangiora.

d) It gives effect to the NPS-UD, specifically Objective 6 c) and Policy 8, delivering significant additional development capacity and contributing to a well functioning urban environment.

e) It is assumed that there will be capacity in the public utilities and the existing road network, including planned upgrades, to accommodate the traffic effects of the redevelopment;

f) The proposed Site specific ODP will provide certainty of the final form and disposition of the re-zoned area including its proposals for reserves, roading, future linkages for pedestrian and vehicular traffic.

140. The re-zoning proposal is considered to be appropriate to achieve the sustainable growth and development of Rangiora.
141. The economic, social and environmental benefits of the proposed rezoning outweigh any potential costs.
142. The overall efficiency and effectiveness of the proposed rezoning (Option 2) is high, in comparison to the alternative options set out in the s 32 Assessment which are low (Options One and Four) or low to moderate (Option Three).
143. The PWDP proposes to release land for development in the new Development Areas at Rangiora and Kaiaipoi through a novel and untested certification process that is not clearly derived from RMA statutory powers, nor Local Government Act 2002 (LGA) authority. This approach is not proposed for the LLR Overlay areas. As the proposed Lehmans Road LLR D2 zone proposed by this submission seeks large lot urban densities, it is anticipated that Council may favour the certification process if it accepts the proposed rezoning. This is opposed – rezoning to LLRZ D2 is sought.
144. Potential difficulties with the proposed certification process are identified and discussed in the Section 32 Assessment. (**Appendix 3)**. In summary, the process is hugely discretionary, does not provide conventional rights to an applicant (eg right of objection/appeal) meaning decisions cannot be challenged, and it is not apparent that the process will be appropriately documented with a transparent record of the decision-making within the certification process. Further uncertainty arises in the practicalities of how to negotiate and manage the staging, funding and building of key infrastructure across a range of Sites, and a risk that land supply is controlled by a limited number of large developers. It is a far less efficient and effective method for delivering land for housing than the Council rezoning the land in the PWDP.
145. The proposed rezoning is considered to be the most appropriate, efficient and effective means of achieving the purpose of the RMA.

CONSULTATION

146. The landowners and their consultants have submitted on the WRRS and the WDDS (**Appendix 4)**.
147. The submissions to re-zone as rural residential or identify the Site as suitable for LLRZ have been rejected as noted above. LLRZ but at higher densities as now proposed is considered to be a more efficient use of the land and better meets market demand. 5000m^2 sites provide more land is needed for a spacious home and garden.
148. The landowners have been consistent in their wish to find a zone and possible land uses better suited to their needs.

CONCLUSION

173 The submission seeks to rezone 58 ha of land adjoining Rangiora from Lifestyle Rural Zone (LRZ) to Large Lot Residential with a specific density standard (LLRZ D1), minimum average lot size 1500m^2.
149. The Site has a long history of rural lifestyle use. It is not significantly restricted by potential natural hazards especially flooding, nor does it have physical limitations for development for residential purposes as it is not liquefaction prone, and has no known geotechnical limitations but does contain an area of LUC 2 soils. It is near a site of significance to iwi (SASM – 025) being the Rakahuri/Ashley River The Site has access to a collector road and is near to a strategic road giving direct access to the town centre and a range of community amenities and facilities.
150. The Site immediately adjoins the urban area of Rangiora, and is well located to join in to Council utility services. It is well suited for conversion to residential use.
151. The Site is not identified within the westward growth direction for Rangiora in the District Development Strategy 2018 nor is

it part of the DEV-WR development area which adopts Lehmans Road as its western boundary. It is in a location that achieves coherent and compact urban form offering ease of access to business services, community facilities, reserves and the primary road network.
152. The proposed rezoning provides for a connected and high amenity residential living environment not presently available under the PWDP while avoiding and/or mitigating any potential adverse effects on the environment. It will provide for continuing high demand for a variety of high quality residential sections aimed at a particular segment of the housing market in an ideal location, easily accessible to the existing town centre services and facilities. It will broaden the range of housing available. As such, it is consistent with the NPS-UD including Objective 6c) and Policy 8, to be responsive to proposals which supply significant development capacity and contribute to a well functioning urban environment.
153. The use of this Site for residential purposes can be a sustainable and efficient use of land and infrastructure. The proposed rezoning better provides for the social, economic, environmental well-being of the landowners and the Rangiora community than continuation of the current low intensity lifestyle land use on 4ha blocks, or a conventional LLRZ residential use.
154. Any potential adverse effects of the implementation of the proposed rezoning can be assessed at subdivision stage but there has been no restriction on servicing the blocks to date. Capacity will need to be confirmed for infrastructure, power and road network. Any future subdivision of the Site will need to confirm water supply and wastewater treatment and disposal options.
155. Rezoning of the site to LLRZ zone is not inconsistent with the policies and objectives of the PWDP, but it is at odds with the dated CRPS approach to provision of urban growth and housing capacity for Greater Christchurch, to the extent that it is not within an FDA created by Change 1 to the CRPS and is not identified as an LLRZ site under the strategic RRS prepared by the Council.
156. As the proposal helps achieve the purpose of the RMA, and has been shown to be consistent with the relevant provisions of the NPS-UD, the submission can be accepted by Waimakariri District Council.

Original Submission

Summary Reasons for the Submission

The reasons for our submission are outlined below.
a) The preferred relief (**the proposed rezoning**) is both appropriate and necessary to achieve sustainable growth and development of Rangiora and the District and meet the requirements of the National Policy Statement for Urban Development 2020 (**NPS-UD**).
b) The Site identified in Figure 1 and at para 1 of the Preferred Relief above is a logical and preferred location that lends itself to a specific type of housing development not provided within the PWDP as a residential option adjoining but outside the existing urban areas. Nowhere is it possible to develop in a comprehensive, coordinated way a low density, high quality residential environment in the District's towns, the Rural Lifestyle Zone or Settlement Zone as a permitted activity.
c) The requirement for 12/15 hh/ha in GRZ zones (the majority of land in urban areas) drives development to modern scale relatively small urban lots best produced as a package across a significant land holding. The GRZ subdivision standards do not provide for the needs of people who seek a generous sized urban lot residential setting. This is a housing sector that is running against the planning tide of intensification but is, nonetheless, a legitimate form of housing in an appropriate setting. The barriers to such development in urban areas requires an appropriate setting/ location in the rural areas but close to or adjoining the urban areas and at a much lower density than is desired or appropriate (the PWDP LLRZ) to meet the housing needs for generous sized urban lot residential living..
d) The PWDP subdivision standards for LLRZ require lots that are very large for those whose primary interest in a rural setting is a form of residential living, not one that requires significant maintenance and management often involving animals or machinery at scale. Conversely, the GRZ subdivision standards do not provide for the needs of people who seek a large lot residential setting
e) The focus in the PWDP is on prescribing a limited range of residential options and tightly controlling and constraining housing choice within those options. Further urban growth is also tightly constrained and controlled around DEV areas around Rangiora and Kaiapoi but for a very specific form of residential development driven off density requirements that do not match the needs of all landowners.
f) The focus in most new District Plans, driven in part by the National Planning standards, is to simplify the range of zones, to standardize lot sizes, to supposedly create efficiency and certainty through ease of administration of the District Plans. This is done by constraining housing and land development choices by lot size, by location, by built standards and the disposition of built/open elements in a site. However, the National Planning standards do provide for large lot urban residential living, a residential living option which has not been taken up the PWDP (due most likely to the restrictive provisions of the CRPS which only prescribe one from of lower density residential living, at a density of 1-2 hh/ha).
g) This planning approach may be a standard approach to resource allocation but it does not provide a flexible, responsive

approach to innovative and new development options. The Government is creating policy settings that on one hand seek intensification in urban areas, while at the same time pushing away from a land allocation model of planning. The PWDP in striving to face both policy directions has a package of measures that are in fact a major barrier in terms or cost, timeframes and certainties for proposals that are not cut from the suite of housing and development options set out by the PWDP. The allocation of land in preferred development areas, it must be said, runs counter to the Government's push, and now its direction, to free up land for development, to encourage innovation in housing (presently with a focus of intensification) and to make available a range of responses to the need to meet the housing needs of people and communities set out in the NPS-UD.

h) While the weight of demand (and the planning response) is around affordable housing, around small lots and dense development that supports investment in public facilities and amenities such as public and active transport, reserves, and commercial services, there is always a wide spectrum of preferences at play in the housing market. The demand for high quality, generous houses set on generous sized parcels of land within high amenity settings is an important and no less relevant housing sector. There is a strong unmet demand, as confirmed by advice from Bayleys real estate (**Appendix 5**) for larger family homes with room for a pool or similar. Purchasers want to be close the amenities of Rangiora and within walking and cycling distance of local schools. They do not want the only available options – a 4 ha lifestyle block or 5000m^2 rural residential site at Mandeville or Ohoka.

i) Interestingly enough for a nation built on the so-called quarter acre paradise, recent policy and planning interest in housing and land development has now seemingly positioned the 1011m^2 section as a luxury item, as the antithesis of providing for community well-being and needs. It is as though the old quarter acre of itself acts against building a sense of community despite being able to be developed in a planned, structured, coordinated or integrated manner. Rather than being a frivolous discretionary item in land development
and housing choice, a well-planned, well located and properly serviced low density residential environment has much to offer urban environments. They can be tactically used to provide shape and edge to urban areas, they can provide a mass of amenity different from (and potentially complementary to), but no less legitimate in urban outcome terms, to conventional GRZ zoned land.

j) In many ways the approach of a district plan to the role and place of the old quarter acre is not dissimilar to the issues faced by comprehensive retirement villages when first proposed. The idea of dense, almost gated and self-contained communities, with multi storey buildings also did not sit well in many district plans. But now they are accepted as an important part of the urban fabric catering to a specific demographic and health demographic. Most plans enable them.

k) Provision for low density residential in an urban setting, or failing that likelihood, in an adjoining rural zone is a fundamental gap in the district plan.

l) The submission seeks to provide for another housing typology not provided in the PWDP and in a location with significant planning merit. The planning case was made out in a detailed submission to the proposed Rural Residential Strategy (**RRS**) for the land identified in this submission to be "reserved" for conventional Rural Residential zoning in the review of the District Plan. That submission was rejected in favour of a decision ascribing an unspecific strategic significance to Lehmans Road as the urban boundary; simply the decision was that rural residential development here would preclude this area as a future urban growth path, even though this was likely to be very long term as the Waimakariri District Development Strategy (WDDS 2018) for the period up to 2048, does not favour urban growth west of Lehmans Road.

Officer Recommendation

Continue to exclude the area west of Lehmans Road and the racecourse land at Rangiora as growth areas as these were originally considered but not included in the draft RRDS as they trigger the key preliminary criteria of: being on the direct edges of a main town outside of the Projected Infrastructure Boundary (PIB) thereby foreclosing more intensive long-term urban development, and…

Panel Recommendation

The panel accepted the officer recommendations to exclude areas on the fringes of Rangiora in the final RRDS due to these having the potential to foreclose more intensive long-term urban development of the town.

m) In light of the above decision on the Waimakariri Rural Residential Strategy, the proposal now is for a form of high amenity low density urban zoning, which whilst in demand is entirely absent from the PWDP. This will be a long term urban form of development. The proposal set out in the submission will achieve a compact, and efficient, urban form on the edge of Rangiora with excellent connectivity by multiple transport modes. It provides for continuous urban development by enabling a built form which can act as a strong zone or urban boundary.

n) The proposed rezoning will accommodate approximately 311 LLRZ lots1 at the proposed amended density standards for LLRZ D2 (average size 1500m^2). It will contribute to a well-functioning urban environment, meeting the NPS-UD Objective 6(c).

o) Any adverse effects on the environment arising from the proposed rezoning will be minimal, if any, and can be adequately mitigated. A high amenity master planned development is proposed.

p) Significant positive effects arise from the proposed rezoning. It will enable the short term housing demand at Rangiora to be met, and can deliver a housing typology for which there is demand, on lots that are not a burden to the landowners (which is the case for 4ha and the very limited areas of LLRZ D1 with a density of 1-2 hh/ha) and for which there is no provision in the PWDP. At present rates of land uptake there is about 4 years vacant land supply in Rangiora. Given it takes 3-5 years to bring land from zoned state to on the market as developed lots, there is some urgency in providing additional capacity. This proposal helps address an anticipated shortfall in residential zoned plan enabled land.
q) There is no additional cost to the Council in re-zoning the Site as there is expected to be capacity in the public utilities and the existing road network, including planned upgrades.
r) Amendments to PWDP objectives and policies may be necessary to provide for a higher density LLRZ, but of themselves will not act against those relating to Strategic Directions Urban Form and Development and Urban Growth. The PWDP approach to zones and
identification of future development land is already out of step with higher order Resource Management Act 1991 (RMA) statutory documents because they do not give effect to the NPS-UD (and are sought to be amended through this submission).
s) The alternatives of retaining Rural Lifestyle or Large Lot Residential zone across the entire Site are not an efficient use of land which immediately adjoins the urban area of Rangiora, and is highly accessible to the town centre by active transport modes as well as car.
t) The proposed rezoning is consistent with and the most appropriate, efficient and effective means of achieving the purpose of the RMA.

The Site
1. The Site is a 58ha block of land ('the Site') accessed from Lehman Road, Rangiora **(Figure 1)**. It is owned by the two submitters and 12 other landowners.

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1 Assumes 20% of land area taken for servicing including roading, reserves and stormwater management if required.

Figure 1: The site (outlined in blue (Google Earth)

2. The Site is surrounded by RLZ land that is used for a mix of lifestyle and conventional farming. To the NE is the Rangiora Eco Holiday Park, and beyond the Park is the Rangiora Racecourse about 300m away from the nearest lot and 1km from the centre of the Site. Land to the south east is GRZ and part of urban Rangiora with newly developing residential land west of West Belt. About 1.9 km to the NW is Rangiora Airfield. About 1km north of the most northern lot is the Ashley River.
3. The southern-most lot in the proposal with the Rangiora Vet Clinic faces, but does not have access to Rangiora-Oxford Road (State Highway 72). This arterial road provides the main road connection in to the centre of the town. The well-established Fernside Rural residential area is about 2.5km west from the junction of Lehmans and Rangiora-Oxford Roads.

Figure 2: the site is a broader context (Site marked red)

4. The Site is not identified as lying within a preferred growth direction for Rangiora in the Waimakariri 2048 District Development Strategy (2018) (**WDDS**) **(Figure 3)**. No land west of Lehmans Road is included in the West Rangiora Development Area (**DEV-WR**) in the PWDP.

Figure 3: Figure 11 WDDS

5. The Council reviewed its strategic approach to the location and provision of Rural Residential land (now zoned LLRZ in the PWDP) in the WDSS. It adopted the position that it would:

a) Explore tools such as cluster development to manage rural character

b) For rural residential development, adopt an approach that has a primary focus on creating new rural residential areas, with a secondary focus on enabling large lot intensification within existing rural residential areas where there is sufficient community support and servicing available

c) Review the Rural Residential Development Plan for the whole District (pg 21 WDDS).

6. Rangiora presently has a population of 17,841 (2018 Census). It grew steadily between 2006 and 2018. Growth of Rangiora since then has continued in step with the district growth which has increased 8.2% between 2018 and 2021 from 61,300 to 66,300 at an annual average of 2.8% from 2018 to 2020 (Statistics NZ Subnational population projections at 30 June 2021: provisional).

2006 (count)	2013 (count)	2018 (count)
12,165	15,069	17,841

Statistics NZ

Population projections at 30 June

PLANNING STATUS OF THE SITE

Chapter 6 of the Canterbury Regional Policy Statement

7. An assessment of the CRPS is set out in **Appendix 1** to this submission.
8. The Site is within the Greater Christchurch area.
9. It was not shown as a Greenfield Priority Area – Residential (GPA) on Map A of the Canterbury Regional Policy Statement (CRPS). The GPA terminates at Lehmans Road.
10. As a result of the Minister for the Environment's decision of 28 May 2021 on Change 1 to Chapter 6, an area largely south of Oxford Road and a finger of land to the north of Oxford Road was included as a Future Development Area (**FDA**) (**Figure 4** orange).

Figure 4: Map A Chapter 6 Regional Policy Statement Greenfield Priority areas
Site location identified with red circle (appx)

11. The FDAs are intended to accommodate the increased demand for new dwellings in that part of Waimakariri District within the Greater Christchurch Urban Area and to respond to the NPS-UD. They do not provide "plan enabled" land as they need to negotiate a rezoning process to confirm their status as land developable for housing and other urban purposes.
12. The proposal for a LLRZ zone with average lot sizes of 1500m2 is inconsistent with the policy approach of Chapter 6 for Greater Christchurch, in that if fits none of the residential living typologies provided for in Chapter 6 and is not in a location identified for urban or rural residential development. It sits 'between' the urban and rural residential densities provided for in the CRPS (minimum 10 hh/ha for urban in Waimakariri, and average 1-2 hh/ha for rural residential). The proposed density is appx. 6.66 hh/ha.
13. Notwithstanding, the proposal meets all the location and other criteria in CRPS Policy 6.3.9 for rural residential development. It is:

- Outside the CIAL noise contours
- Has some sites with restrictions from the take-off and landing vectors for Rangiora Airfield but not such as to impact its operational capacity.
- Is outside the groundwater protection zone
- Is not within the Waimakariri stop bank system
- Has no views of or to the Port Hills
- Has good access for emergency services
- Will not create reverse sensitivity issues with adjoining land uses; Rangiora Racecourse is 500m away.
- Free of significant natural hazards and is a flat site.
- Supports no significant natural values or ecological values.

• Contains no SASMs.
• Can be integrated into or consolidated with the existing urban area of west Rangiora.
• Contains no surface water bodies so there will be no adverse impacts on these.
• The development will be contingent on an ODP to provide integrated design for subdivision and land use, and provide for the long-term maintenance of a high quality high density rural residential character.
• The proposal is not intended as a staged development towards full urban; rather it is intended to provide a unique residential environment that can stand alone and contribute to the urban fabric of Rangiora like Palmview in east Rangiora, or as Kaiapoi Lakes does for Kaiapoi.

14. Overall, the proposal is not consistent with Chapter 6 but that is more a function of its original purpose when formulated in 2013. Notwithstanding that, the submission for a lower density residential focussed, high quality urban environment that attaches to an existing urban area and that promotes a coordinated pattern of development has planning merit.

Operative Waimakariri District Plan

15. The Site is zoned Rural in the Operative Plan. The minimum lot size for subdivision and a dwelling is 4 ha.

Proposed Waimakariri District Plan

16. The Site is zoned Rural Lifestyle Zone **(LRZ) (Figure 4).** The minimum lot size for subdivision and a dwelling in the LRZ is 4 ha.
17. Oxford Road is a strategic road and Lehmans Road is a collector road.

Figure 5: Proposed District Plan Zoning (site outlined in red)

18. The Site is also subject to, or potentially influenced by, a number of Overlays:
a) Rangiora Airfield Take Off Climb and Approach Obstacle Limitation Surface (**Figure 6**)
b) National Grid Transmission Lines (**Figure 6**)
c) Liquefaction: Liquefaction damage is unlikely (**Figure 6**)
d) Non-Urban Flood Assessment Area (**Figure 7**)
e) Geographic areas: Ecological Area – Plains
f) Ecological District – Low Plains

Figure 6: Rangiora Airfield Take-off and Approach vectors (blue dashed lines); Liquefaction damage unlikely (green)Transmission lines (green lines); Site outlined in red

Figure 7: Non-urban flood assessment & Waimakariri Flood Hazard maps
Blue – medium risk, green – low risk, white – very low

DEVELOPMENT PROPOSAL AND PROPOSED REZONING

19. Subdivision of the Site will create approximately 311 LLRZ D2 lots.
20. The key design drivers for the proposal are:
a) A high amenity premier residential zone with large houses on large sites – average 1500m^2, min 1000m$_2$ based on the St Kilda, Hamilton development concept (**Figure 8**).
b) LLRZ D2 standards would enable a lower density zone in the medium term e.g. 10 years to achieve a high quality consistent character subdivision. If developed as an integrated development subject to an ODP subdivision can be staged for to the proposal.
c) Creating strong connections with the immediate neighbourhood by providing a cohesive interconnected roading layout that picks up direct links to the eastern neighbourhood off Lehmans Road and the northern subdivision roading, and carries them into the Site.
d) Creating a high amenity and diverse residential neighbourhood by providing interfaces to roads, reserves and rural environments.
e) Respecting and building on local identity and character of Rangiora by retaining specific vegetation features from the Site, and anchoring the development into the wider landscape.

21. A development concept can provide for sound urban design by:
a) A hierarchy of movement corridors.
b) Prioritisation of walking and cycling.
c) A north-south alignment of street blocks to maximize solar access and provide for efficient use of lots.

d) Block perimeters being kept as small as practicable to aid permeability and higher public amenity.
e) Enabling a range of housing typologies set in high quality landscape and street setting with generous amenity plantings and curtilage.

Figure 8: St Kilda development images (Bayleys)

22. St Kilda, Cambridge is a premier development on the outskirts of Cambridge, centrally located and with easy access to the Waikato Expressway. It was originally part of a small dairy operation which was dissected by the Waikato Expressway, leaving a portion within the Cambridge Town boundary and the larger balance of the property of approximately 80 ha (which became St Kilda) on the Eastern side of the Expressway, left in the Rural Zone.
23. The initial development concepts were for a Rural Residential type development given the Expressway separation of the existing residential development on the Western side of the Cambridge Bypass, however this was not supported by Council and a new concept of larger residential sections of a 1600m² average size was developed and approved – see https://www.stkilda.nz/page/location/

EFFECTS ON THE ENVIRONMENT

Township growth and urban form

24. The Site immediately adjoins the western edge of urban Rangiora.
25. The WDDS indicated a general preference for the direction of urban growth of Rangiora to the east as a way of balancing up the residential areas around the town centre and some growth to the west.
26. The approach of the WDDS was to signal growth options to be confirmed in the District Plan Review:
The broad directions for greenfield residential growth for the District's main towns are set out in Figures 11 to 14. Further work will be carried out to identify and confirm the exact locations and extent of these residential growth areas, together with the intensification opportunities within existing urban areas. These will be enabled through the District Plan Review and other planning tools.
27. The Strategic Planning documents clearly signal active consideration of growth needs and growth directions. The options available to the Council were constrained by the approach of the CRPS as the District Plan has to give effect to the CRPS and cannot be
inconsistent with it. The CRPS took effect in 2013 and is overdue for review.
28. The CRPS tightly holds urban growth to the constraints of Map A Chapter 6 and the identified FDAs which although amended by Plan Change 1 in 2020 does not respond to the directions of the NPS-UD. In any event the approach is focused on the need for housing in full urban residential land, less on other residential development forms.
29. As such the Site falls outside the planning policy framework for urban growth. However, in terms of urban form and on the ground, there is considerable merit and logic to conversion of this existing LRZ land to a new high amenity residential form that can be integrated into the Rangiora urban fabric.
30. The proposal has the potential to anticipate the longer term growth path confirmed by the decisions on the RRS to protect the future growth option of more intensive urban development in this direction. It can set a pathway to further westward expansion on land
that holds few if any physical barriers to land development.
31. The proposal will contribute to the housing needs of Rangiora and in a form and location that does not undermine the long run urban form of Rangiora. Planned growth confirmed in the PWDP is already intended to extend westwards out to Lehmans Road and to keep the town edge squared up providing depth to future development and providing a rational basis for providing movement networks driven off the key roads such as Rangiora-Oxford Roads. The West Rangiora Future Development Area confirms this approach. The Site sits in the next block west of Lehmans Road so is not proposing a disjointed urban form, nor one that is not part of the long term thinking of urban form and growth for Rangiora.

32. A full residential zoning is proposed under LLRZ D2 and will provide a high quality street character, overall amenity and passive surveillance over the street, and will create the correct lighting standards, roading standard, fully formed footpaths and cycleways required for a high quality urban environment.

Neighbourhood and wider community effects

33. The Site is serviced by a collector road and is close to an arterial road. This provides for ease of access and safe and convenient movement to and from the Site. A planned development co-ordinated by an ODP can facilitate within the site

movement corridors and linkages through the Site to provide for walking and cycling.
34. A key positive neighbourhood and community effect will arise from the existing dwellings and their established gardens and plantings that will anchor new development and provide a point of reference for new dwellings. Development will not be on a bare site; it will take place in an existing established part-residential setting. The transition to a low density, high quality premier residential development will start from a favourable position and minimise the apparent extent and nature of the landscape change.
35. The Site is comparatively large (58.4 ha) and has the potential to support a variety of residential building typologies and this will contribute to a mix of households within the development and provide built form variety and interest in the streetscape. Whilst LLR D2 standards are proposed, it may be that part of the Site is suitable for other higher density forms of development, which would be within scope of the alternative relief, and could be considered as part of the master planning process required for preparation of an ODP (ahead of the hearing). The earlier stages of the St Kilda development were for large lot residential, with more clusters of townhouses included as later stages (and a retirement village). A retirement village is unlikely in this case, given the proximity of the Charles Upham Retirement Village.
36. Rangiora is well-positioned to accommodate and service the needs of a fast-growing resident population that will in turn support more business activity, schools, community facilities and community organisations.

Effects on tangata whenua values
37. The Proposed District Plan does not identify any Sites and Areas of Significance to Maori in the Site, but the nearby Rakahuri/Ashely River identified as SASM-025. This has been scheduled as being
River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species
38. The PWDP has Policy SASM-P8 which is relevant to pre-development processes:
Engagement with rūnanga
Te Ngāi Tūāhuriri Rūnanga and the District Council to encourage engagement with the Rūnanga priorto persons undertaking activities and/or applying for resource consent where the activity has thepotential to adversely affect identified sites or areas of Ngāi Tūāhuriri cultural significance. Where priorengagement with Te Ngāi Tūāhuriri Rūnanga h as not been undertaken by an applicant for an activitythat has the potential to adversely affect an identified site, the District Council will consult with the Rūnanga.
39. The Site is not listed as an archaeological site on the NZ Archaeological Site database.

Landscape and visual effects
40. Rural Lifestyle style development exists on the Site now (a series of 4 ha lots with a dwelling and associated accessory buildings on each). The landscape is dominated by shelter belts, utility buildings, significant trees and planted curtilages around dwellings many of which are well set back off the roads down RoWs.
41. An ODP will help to achieve an integrated, cohesive and coherent development The proposal will lead to a modification of the landscape of the Site from a predominantly lifestyle block landscape to a denser semi-urban environment dominated by residential building that will, in time, get the benefit of street tree and reserve plantings and landscape treatments around the houses.
42. The visual effects which will arise from a change in the number of vegetative and built elements in the landscape are significant, but not avoidable, if the Site is to contribute to the on-going growth of Rangiora. The change will contribute to a high quality amenity and quality of environment and one that will be entirely consistent with and supportive of the rural lifestyle residential development that has successfully established on the Site.

Well-functioning urban environments
43. The Site adjoins the existing built up urban area of Rangiora. Immediately to the east are existing or developing residential areas.
44. The conversion of the Site from present rural lifestyle uses to low density, high quality residential will continue a pattern of outward expansion of Rangiora. Such a change may not be consistent with the PWDP's identification of a Future Development Overlay for west Rangiora only as far west as Lehmans Road, but on the ground it will look and integrate as part of the urban fabric.
45. It will provide some replacement lower density living areas for the existing LLR zones at north west Rangiora – but at much more appropriate higher density that the LLR D1 standard which is 1-2 hh/ha. There are two such areas, shown on the planning maps below. River Road has an 'urban overlay' and is intended to be intensified to urban densities. The land on the opposite (east) side of Lehmans Road is a 'legacy' rural residential zoning which applies under the Operative District Plan. The landowners have developed the adjoining residential subdivision and wish to develop the land for full urban residential development. Services are in place to support this. The constraint to date has been Map A of the CRPS which does not include the land as a Greenfield Priority Area or Future Development Area, GR zoning of this land is consistent with the NPS-UD.

Figure 9: PWDP as notified – LLRZs shown in light grey. Diagonal stripes – urban growth overlay.
Site outlined in red.

46. Rangiora is growing apace. It is attracting significant interest from new home buyers as people respond to the significant investment in upgraded transport links (Northern Corridor and public transport) and a growing economic base for employment within the District and the City.

47. Rangiora has excellent connectivity to the City, both via the new Northern Corridor, and a nascent cycleway link into the City. There is a very regular bus service every half hour.(the No 1 Blue Line) The standard trip takes 70 minutes, and there is a twice daily weekday morning express service from Rangiora, and seven times weekday express out to Rangiora all via Kaiapoi.

48. The Site will step out the western edge of Rangiora, but as it exists in a peri-urban form now, such a change does not alter how the Site interacts with Rangiora as a whole. It is in many ways a functional part of urban Rangiora now; it's only the Zone boundaries and policy framework that create the sense of it not being part of Rangiora.

49. The Site is convenient to the Rakihura/ Ashley recreation trails, the racecourse, Arlington Park, and the airfield. The town centre is easily accessible.

50. The following assessment of the criteria in the NPS-UD for determining a well-functioning urban environment shows that the proposed rezoning will deliver urban, housing and residential outcomes that meet those criteria. There will be a variety of homes enabled by generous lot sizes. The Site is well-positioned, building as it does on an existing township well-serviced by public transport and cycling options, to provide good accessibility to jobs, community services, and open spaces, as well as mitigating climate change impacts and future natural hazards by being not near the coast and well removed from major rivers.

NPS-UD Policy 1

Planning decisions contribute to well functioning urban environments, which are urban environments that, as a minimum:	**Assessment**
(a) have or enable a variety of homes that: (i) meet the needs, in terms of type, price, and location, of different households; and (ii) enable Māori to express their cultural traditions and norms;	The proposal is to have larger lots supporting predominantly standalone dwellings and associated accessory buildings (including generous sized garaging) in an open landscaped garden setting. This will fill a gap in the range of housing typologies available at Rangiora and contribute to a better functioning urban environment overall at Rangiora. It is not necessary for each individual rezoning proposal to have a wide range of housing typologies, and in some circumstances this may not be appropriate. The rezoning will deliver a premier high amenity urban subdivision with generous sized lots which will complement existing and planned higher density residential development at west Rangiora. There is scope with the relief sought for a mix of residential densities. The appropriateness of this can be considered at the master planning/ODP stage. The Site has the potential to create a unique urban environment in Rangiora. It can follow the example of Palmview based on a lake or Kaiapoi Likes providing a niche housing option in Rangiora and the District meeting a need for residential land not constrained to GRZ standards.
(b) N/A business sectors	
(c) have good accessibility for all people between housing, jobs, community services,	The Site has access to a collector road and a strategic road providing easy access to key community amenities and facilities. The town is served by a public bus route to the city, and a cycle trail connecting to Kaiapoi and the City. The new West Rangiora Development Area adjoins the Site to the south. The Site will become closer to Rangiora public transport routes as they extend out to service this new growth area over time.

natural spaces, and open spaces, including by way of public or active transport; and	The Site is in walking distance to Arlington Park and the Rakahuri/Ashley which contains abundant recreations pace. It is easily accessible to the town centre and within walking distance to the Huntingdon Drive local centre.
(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and	The demand for housing and land in Rangiora is largely ahead of the planning means to respond. This proposal will "top up" the land presently set aside in the PWDP and provide a useful buffer to demand. The Site owners have been keen to release this land for more intense development for some time; there is no prospect of land banking.
(e) support reductions in greenhouse gas emissions; and	The Site has significant advantages in being easily accessible to the town centre and reserves, community facilities and schools. The proposal retains a consolidated form to Rangiora with good connectivity and linkages to recreation space and commercial centres reducing the need for car travel.
(f) are resilient to the likely current and future effects of climate change	The Site is within the area of influence of a major river but the non-urban flood assessment maps do not show extensive flooding likely at the Site. Being inland it is not at risk from climate change induced extreme natural hazard events like sea level rise. or river flooding.

Effects on ecosystems and habitats

51. The Site is currently used for a mix of low intensity (grazing) farming, and lifestyle purposes. Shelter belts and utility buildings have been established
52. The Site has been identified in the PWDP with two ecological overlays (the PWDP ecological overlay – Plains and Low Plains Ecological District). They are a district-wide overlays and no specific ecological values have been identified in the Proposed Waimakariri District Plan. These overlays seek primarily to retain indigenous vegetation. The PWDP identifies SASM 025 nearby the Site. That is a Site and Area of Significance to Maori and in SASM - Schedule 1 is identified as *being River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species.*

Effects on natural and physical resources

53. The Site drains in a SE direction towards the newly developing residential area.
54. There will be a degree of site disturbance as part of creating the roading network, and reserves, and as part of curtilage development on each lot.
55. The proposed use for residential activity inevitably leads to loss of some rural productive potential as land owner intentions are not about farming or productive use of the land, but lifestyle use and enjoyment. Built forms and hard surfaces become more dominant.
56. The Site comprises 4ha bocks now and these are not able to be used effectively for productive purposes other than for intensive productions based on tunnel housing and other supported production systems. None exist in the Site now.
57. The Site contains Class 2 and Class 3 soils as defined in the NZ Land Use Inventory (Landcare Research) Land Use Capability classes 1-3 **(Figure 10)**. Productive use of these soils other than for low level purposes i.e. grazing, is not feasible given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production).

Figure 10: Site soils: Site outlined in red; (Canterbury Maps)
Class 2 soils: bright green/Class 3 soils: light green;

Discharges of contaminants into the environment
58. There will be no discharges of contaminants into the environment. Wastewater will discharge to the Council's reticulated system.
59. Stormwater discharges will potentially be to ground given ground conditions or to an approved and consented stormwater management and treatment area which will meet all relevant Council standards.

Risks from natural hazards or hazardous installations
60. The PWDP planning maps show the Site as being within a Non-Urban Flood Assessment Area.
61. The District Plan maps do not identify high flood hazard areas or high coastal flood hazard areas, rather these are identified through the flood assessment certification process. This enables the most up-to-date technical information to be used. However, as a guide, areas that are potentially high hazard can be identified through the Waimakariri District Natural Hazards Interactive Viewer (NH - Introduction).
62. Rules that refer to a Flood Assessment Certificate require a certificate to be obtained from the District Council to determine compliance with the relevant rule. The alternative is to apply for resource consent as set out in the rule.

63. Rule NH-R2 states
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;

64. Assessment of flood risk and consequence can be undertaken at subdivision stage.
65. There will be no hazardous installations proposed on the Site.

Geotechnical assessment
66. The PWDP planning maps show the Site as being "Liquefaction damage is unlikely. Standard investigation procedure outlined in NZS3604 is appropriate".

Contaminated land
67. A Preliminary Site Investigation can be carried out for the Site at subdivision stage.
68. An enquiry of ECAN has identified that two sites at the northern end of the Site potentially contain some contaminated land, which can be investigated further at subdivision stage **(Appendix 6)**. 315 Lehmans Road is an unverified HAIL site (previous use for clay target shooting) and 317 is registered as containing uninvestigated persistent pesticide bulk storage.

Servicing
69. Proposals for servicing the Site and the effects from such servicing in relation to domestic water supply, wastewater, stormwater, roading, and telecommunications will be required for any subdivision consent.

Economic effects
70. It is anticipated that urban development will generate positive economic effects, both from the investigation/development phase and for the longer run economic activity from householders participating in the local economy.

Climate Change effects
71. An assessment of the effects of the proposed rezoning on climate change is included as part of the assessment of a well-functioning urban environment above.
72. A well-functioning urban area that is designed and serviced in an integrated manner, applying sound urban design principles, will enable a reduction in greenhouse gas emissions compared to unplanned, ad hoc development that does not create compact urban forms located where the services and benefits of existing, established urban areas are not readily accessible.
73. There is a triangle of planning influence that can be brought to bear on reducing greenhouse gas emissions
a) Compact urban form minimising distances between homes and work/play options.
b) Proximity of homes to community facilities, services and amenities and business/work areas.
c) Design and provision of movement corridors and linkages that create opportunities other than for vehicles for getting

around.
74. The Site of the proposed rezoning:
a) Helps in retaining a compact urban form to Rangiora.
b) Is easily accessible to the town centre and is located convenient to the recreation resources of the nearby Rakahuri/Ashley River, the airfield and racecourse and Arlington Park.
75. Rangiora has excellent connectivity to the City, both via the Northern Motorway, the new Northern Corridor, a cycle way link to Kaiapoi which is linked to the new north city cycle way along the Northern Corridor and a very regular bus service.

Positive effects
76. The proposed rezoning will provide for the continued growth of Rangiora by managing the development through an ODP. The proposal will provide a buffer to on-going high level demand for lots in Rangiora. It will cater for a specific housing need not found in GRZ Zoned land nor LLRZ land. The proposed rezoning is anticipating a form of development that is a much more efficient use of a qualifying site supporting a well-functioning urban area. It is a positive endorsement of Rangiora as a growth node in the District.
77. The benefits derived from a planned ODP approach include facilitating high levels of connectivity, creating community links to identified focal points. The Site is close to recreation facilities. A coordinated and integrated development will provide a distinctive environmental quality and point of difference to the development.
78. The Site adjoins existing and developing residential development on the western edge of Rangiora.
79. From a community well-being perspective, the provision of additional land for residential growth will continue to support the Council's investment in community infrastructure by maintaining and facilitating growth rates, increasing the rating base and attracting development contributions.

STATUTORY PLANNING ASSESSMENT
80. Submissions must be assessed under the provisions of the RMA, including Part 2 and Section 32 (Requirements for Preparing Evaluation Reports).

National Policy Statements
National Policy Statement on Urban Development Capacity (NPS-UD)

81. The NPS–UD applies to this proposal as it is directed at Tier 1 urban environments, and
Tier 1 local authorities which includes Waimakariri District as part of the Christchurch urban environment that is defined in Table 1 of the NPS, and additionally defined as:
any area of land (regardless of size, and irrespective of local authority or statistical boundaries)
that: is, or is intended to be, predominantly urban in character; and is, or is intended to be, part of
a housing and labour market of at least 10,000 people.
82. The NPS-UD recognises the national significance of:
a) Having well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future; and
b) Providing sufficient development capacity to meet the different needs of people and communities.
83. The NPS outcomes are to be achieved through objectives that address:
a) Planning decisions improving housing affordability by supporting competitive land and development markets.
b) Regional policy statements and district plans enabling more people to live in areas of urban environments near centres or areas with employment opportunities, area well serviced by public transport or a high demand for housing in the area.
c) Urban environments developing and changing over time in response to diverse and changing needs of people, communities and future generations.
d) Local authority decisions on urban development being integrated with infrastructure planning and are strategic over the medium term and long term.
e) Local authority decisions on urban development are responsive particularly for proposals supplying significant development capacity.
f) New Zealand's urban environments support reductions in greenhouse emissions and are resilient to current and future effects of climate change.
84. The key method to achieve these objectives is by development of a Future Development Strategy (FDS). This will set out how the Councils will provide for sufficient development capacity over the next 30 years to meet expected demand. There is no FDS for the greater Christchurch Urban Area that meets the requirements of the NPS-UD.
85. Work on development capacity completed for the NPS - UDC 2016 by the Greater Christchurch Partnership as an Update of the existing Urban Development Strategy (UDS) – Our Space 2019 confirmed what there was a shortage of feasible development capacity for future housing in Waimakariri District for the medium (next 10 years) and long term (10 to 30 years) periods. That assessment is now out of date as it does not address the requirements of the NPS-UD; and rates of take up of land have exceeded projected rates.

86. One of the key changes in the NPS-UD is that local authority decisions on urban development that affects urban environments are responsive, particularly to proposals that would supply significant additional capacity. It also amends the required methodology for housing and business capacity assessments.
87. The current CRPS does not meet the new NPS-UD requirement in relation to proposals for significant additional capacity. Regional councils are required to include criteria in the RPS to determine what plan changes will be treated for the purposes of Policy 8 as adding significantly to development capacity as soon as practicable. ECAN has yet to respond to this requirement.
88. The NPS-UD has immediate effect, so in the meantime, proposals such as this submission must be assessed in the context of the overall intent and purpose of the NPSUD as articulated in the NPS-UD objectives and policies. This includes that NZ has well-functioning environments; provides sufficient development capacity to meet the different needs of people and communities; planning decisions improve housing affordability to contributing to competitive house and land markets; and RMA plans enable more people to live near major employment areas, where there is existing or planned public transport, and where there is high demand for housing.
89. The NPS-UD is the higher order document and its requirements override those of lower order documents where there is a conflict, including regional and district RMA plans.
90. Key objectives and policies in the NPS-UD are assessed here:

NPS-UD Objective/Policy	**Assessment**
Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	The proposed development will further enable Rangiora to sustain itself as a well-functioning urban environment by consolidating the residential area close to the town centre, and provide residential development close to public transport links and existing community and commercial facilities including Huntingdon Drive local centre.
Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.	The proposal provides choices in the Rangiora housing market and in doing so supports housing affordability. Whilst the proposal is for a premier larger lot urban residential development, it is important that all sectors of the market are catered for. This will be more affordable than forcing those wanting large sections out to the much larger and very limited areas of LLR D1 development, or having to purchase 2-3 sections in a standard residential subdivision. There Site is in multiple ownership and the landowners are working together to achieve the rezoning. It will bring more competition into the market by bringing new entrants into the market.
Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply: the area is in or near a centre zone or other area with many employment opportunities the area is well-serviced by existing or planned public transport there is high demand for housing or for business land in the area, relative to other areas within the urban environment.	The CRPS is due for review in 2024 but in the meantime the existing CRPS is not in accordance with the NPS-UD 2020. The proposed rezoning is on the edge of the District's largest centre, which offers a wide range of community and business services, and employment opportunities. It is expected that a proportion of future residents will commute outside the township, but as the township and associated business areas e.g. at Southbrook, continue to grow, this is expected to become proportionally less. Rangiora is well serviced with public transport, there is scope for future mass transit PP, and there is a high demand for housing at Rangiora. The Site adjoins the new West Rangiora Development Area, to the south. Extensions of public transport to service this growth area will be readily accessible to the Site.
Objective 6: Local authority decisions on urban development that affect urban environments are: integrated with infrastructure planning and funding decisions; and strategic over the medium term and long term; and responsive,	Whilst not currently identified as a future growth area in RMA documents, the Site is well placed at the township edge to be serviced by existing infrastructure. Some upgrades may be required, which will be investigated further with Council prior to the hearing. See Policy 8 below for commentary on proposals which supply

particularly in relation to proposals that would supply significant development capacity.	significant development capacity
Objective 8: New Zealand's urban environments: support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change	The proposal adjoins the existing built up are of Rangiora, close to public transport links. Its excellent accessibility to Christchurch City, substantially enhanced with the new Northern Motorway extensions, means it is now highly accessible to these nearby major employment areas. Travel distances are relatively short, minimising vehicle miles and the potential for greenhouse gas emissions. There is a cycleway link from into Christchurch City, and regular bus services, including an express route. The Site is inland and not subject to natural hazard risks associated with sea level rise arising from climate change.
Policy 1 – Planning decisions for well-functioning urban environments	Assessed at para 41-50
Policy 2 - Sufficient development capacity Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.	The proposed rezoning is anticipated to provide sections that will be available for the short term (up to 3 years) and into the medium term (3-10 years) if adopting a more conservative outlook. The locational and amenity advantages of Rangiora also favour strong ongoing demand. The PWDP UFD-O1 Feasible Development Capacity for residential activities identifies the need for 6300 residential units in the period 2018-2028, and 7100 residential units 2028-2048. These numbers are derived from Chapter 6 CRPS Table 6.1. and are out of date. Data from the Council (November 2021) confirms that there are about 800 vacant lots in Rangiora. Building consents are at about 180/year. That means there is about 4 years vacant land supply. A lead in time of 3-5 years is needed to go from rezone to house build so the Council is facing an unnecessary squeeze on land availability. That will translate in to an upward shift in land and section prices as has been the case at Rolleston. The data suggests that the PWDP will be late to the party to ensure there is at least sufficient development capacity to meet expected demand for housing land over the short term, medium term, and long term. There is a looming, inevitable land supply issue so any proposal to add capacity will push the Council closer to meeting the requirements of the NPS-UD. The proposal is consistent with ensuring there is at least sufficient land supply for housing.
Policy 8 – Responsiveness to plan changes Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is: (a) unanticipated by RMA planning	The proposed rezoning is not anticipated by RMA documents - it is not a Greenfield Priority or Future Development Area in the CRPS, or a New Development area in the PWDP. A responsive approach to the proposal is required as it meets the Policy 8 criteria for unanticipated zoning. It will contribution to well functioning urban environments and will add significant development capacity. There is no development capacity for the housing typology proposed – so any provision is significant in this context. The development will deliver appx 311 high amenity large lot residential sites at an average density of 1500m2. This will be higher if a mix

documents; or
(b) out-of-sequence with planned land release

of densities are proposed, which may be appropriate in some parts of the Site, dependent on master planning work to follow.

91. Adopting the submission to re-zone the land, and enable the proposed development on the submission Site will satisfy the objectives and policies of the NPS-UD.

Proposed National Policy Statement for Highly Productive Land (NPS-HPL)

92. The Government proposed in 2019 a NPS-HPL to prevent the loss of productive land and promote its sustainable management. The overall purpose of the proposed NPS-HPL is to improve the way highly-productive land is managed under the Resource Management Act 1991 (RMA) to:

a) Recognise the full range of values and benefits associated with its use for primary production
b) Maintain its availability for primary production for future generations
c) Protect it from inappropriate subdivision, use, and development.

93. The NPS-HPL is still a proposal and not intended to take effect until after Gazettal. At the date of this submission the NPS-HPL has no effect and no assessment of it is required for the purposes of this submission.

94. The Proposed NPS-HPL interim definition of HPL is land defined as Land Use Capability Class 1-3 soils. A portion of the Site contains Class 2 and 3 soils (see **Figure 10)**. Highly productive use of these soils is not realistic given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production). Its present use as lifestyle blocks, low level grazing and agistment is the more likely long run use of the Site if not rezoned.

95. Objective 3 of the Proposed NPS-HPL specifically refers to highly productive soils being protected by avoiding *"uncoordinated urban expansion on highly productive land that has not been subject to a strategic planning process"*. The Site was assessed through a strategic planning process (WDDS 2018) and the RRS as a preferred site for LLRZ development, and rejected for a change in zoning on the basis that it may be required for long term urban growth of Rangiora.

96. It is therefore considered that this submission to re-zone the Site is largely in accordance with the Proposed NPS-HPL.

National Planning Standards

97. The National Planning standards prescribe various matters under the RMA so that there is consistency among planning documents most relevantly here in terms of appellations for zones, and the standards applying to these zones.

98. The proposed rezoning adopts the standard zone appellation, in this case LLRZ as contained in the PWDP.

99. The PWDP identifies plan standards for minimum and average net site areas for the respective zones. These are modified for the proposed rezoning as a higher density LLRZ.

100. The higher density LLR zoning is entirely consistent with the NPS purpose for the LLRZ as reproduced below. In this case, the principal constraint to more intensive development is the peri-urban location where a lower density transition to the rural environment is appropriate (particularly noting that the zone boundary is 'mid block' so there is no natural or physical buffer between rural and residential areas); the existing pattern of 4 ha lots with existing substantial homes and gardens; and the fact that the premier large lot subdivision proposed relies on consistency of housing quality and character to be deliver on this vision for the area.

Large lot residential zone

Areas used predominantly for residential activities and buildings such as detached houses on lots larger than those of the Low density residential and General residential zones, and where there are particular landscape characteristics, physical limitations or other constraints to more intensive development.

Low density residential zone

Areas used predominantly for residential activities and buildings consistent with a suburban scale and subdivision pattern, such as one to two storey houses with yards and landscaping, and other compatible activities.[2]

Canterbury Regional Policy Statement 2013 (CRPS)

101. Chapter 6 of the RPS *"provides a resource management framework for the recovery of Greater Christchurch, to enable and support recovery and rebuilding, including restoration and enhancement, for the area through to 2028. Recovery in Greater Christchurch is also supported by the provisions in Chapter 5 notated as 'Entire Region'. The provisions in the remainder of the RPS also apply.3"*

102. An assessment of the proposed rezoning against the relevant CRPS Objectives and Policies is set out in **Appendix 1**. This should be read in the context of the CRPS being overdue for review and that it does not provide a regional response to the NPS-

UD. The
need to focus on earthquake recovery has now passed and so many of the directive provisions need to be given appropriate 'weight' in a new national policy environment with a focus on flexible, responsive panning approaches that better provide for people's needs and well-being.

103. That assessment shows that

a) The development proposal achieves the objectives for the location, design and function of new developments (Objective 5.2.1)

b) The traffic effects of the proposal are unlikely to give rise to adverse effects and so achieves CRPS objectives for the strategic land transport network (Policy 5.3.7)

c) The Site falls outside the FDAs shown on Map A of Chapter 6 and in that regard is inconsistent with RPS Policy 6.2.1 clauses 1 to 3.

1. identifies priority areas for urban development within Greater Christchurch;

2. identifies Key Activity Centres which provide a focus for high quality, and, where appropriate, mixed-use development that incorporates the principles of good urban design;

3. avoids urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS

d) The environmental effects assessment outlined above establish that the proposed development is consistent and will not give rise to any concerns with respect to all the matters listed in RPS Policy 6.2.1 clauses 4. to 11. These matters are:

6.2.1 Recovery framework

Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that:

1. As above;

2. As above;

3. As above;

4. protects outstanding natural features and landscapes including those within the Port Hills from inappropriate subdivision, use and development;

5. protects and enhances indigenous biodiversity and public space;

6. maintains or improves the quantity and quality of water in groundwater aquifers and surface waterbodies, and quality of ambient air;

7. maintains the character and amenity of rural areas and settlements;

8. protects people from unacceptable risk from natural hazards and the effects of sea-level rise;

9. integrates strategic and other infrastructure and services with land use development;

10. achieves development that does not adversely affect the efficient operation, use, development, appropriate upgrade, and future planning of strategic infrastructure and freight hubs;

11. optimises use of existing infrastructure; and

12. N/A

e) The proposed rezoning achieves policies relating to:

- Sustainability;
- Integration of transport infrastructure and land use;
- Urban design; and
- Biodiversity, natural hazards, landscape, soils, contaminated land.

104. In terms of the CRPS polices for rural residential developments (Policy 6.3.9) the proposal sits square with all policy matters other than being a location identified in an adopted Rural Residential Strategy; and being at a higher density than provided for under this policy (ie greater than 1-2 hh/ha). As such it has a majority of features entirely consistent with the policy.

105. The CRPS includes housing capacity targets as below

6.2.1a Targets for sufficient, feasible development capacity for housing [inserted in accordance with sections 55(2) and 55(A) of the Resource Management Act 1991, from the National Policy Statement on Urban Development Capacity 2016]

For the period 2018-2048, sufficient, feasible development capacity for housing is enabled in Greater Christchurch in accordance with Table 6.1.

Table 6.1 Targets for housing development capacity in Greater Christchurch, 2018-2048

106. These derive from Our Space, under the requirements of the then NPS-Urban Development Capacity 2016, since replaced by the NPS-UD 2020. The targets (known as bottomlines in the NPS-UD) are to be treated as 'minimums' not 'maximums'.

Policy 6.3.12
enables urban development in the Rangiora and Kaiapoi FDAs (new Development Areas in the PWDP) where needed to meet the medium term targets. This a 'minimum' allocation approach contrary to the NPS-UD. The NPS-UD favours over allocation, including in locations unanticipated by RMA plans, where it will add additional development capacity, can be integrated with infrastructure planning and funding, and will contribute to well functioning urban environments – as is the case the proposed Lehmans LLR D2 zone.
107. The proposed Lehmans LLR D2 zone is consistent with the CRPS except with respect to those parts of the CRPS which are out of step with and do not give effect to the higher order plan, the NPS-UD.

Proposed Waimakariri District Plan
108. An assessment of this proposal against the relevant PWDP Objectives and Policies for urban growth and development as notified on 17 September 2021 is set out in **Appendix 2.**
109. That assessment shows that the proposed rezoning is entirely consistent with the relevant objectives and policies, including as sought to be amended by this submission. Those amendments are to UFD-P3 Identification/location and extension of Large Lot Residential Zone areas; and LLRZ-O1 and LLRZ- P1-5 and reflect the intent and outcomes intended for the proposed LLRZ D2 zone, which is a higher density LLRZ zone than the PWDP LLRZ zone (renamed LLRZ D1 in this submission).

ASSESSMENT AGAINST OTHER PLANNING DOCUMENTS
Our Space 2018-2048 Greater Christchurch Settlement Update (2019)
110. Our Space is a non-statutory document prepared under the Local Government Act. It
"responds to the new Government Policy Statement on Land Transport, which has increased funding for mass public transit schemes, and meets the requirement of the National Policy Statement on Urban Development Capacity (NPS-UDC) 2016 to prepare a
future development strategy…. Specifically, it:
• sets out how targets for housing for the next 30 years will be met, accommodating an additional 150,000 people;
• identifies locations for housing growth, encouraging Central City and suburban centre living while providing for township growth in Rolleston, Rangiora and Kaiapoi;…
• promotes a compact urban form, which provides for efficient transport and locates development in a manner that takes into account climate change and sea level rise.[4].

..Underpinning this settlement pattern approach is the vision for a transformation of the transport network that fosters much greater public and active transport usage, and reduced reliance on the private vehicle.
111. Our Space acknowledges that this will require commitment from the Government to invest in the necessary improvements to our transport system, which could include investing in rapid transit services. To date, there has been no successful business case for improved public transportation, including not as a Covid 19 fast track infrastructure project.
112. The Our Space housing capacity targets (Table 3) and Future Development Areas are related to growth of urban areas.
113. Our Space, like the CRPS (and the Operative District Plan) are now out of date, as they do not reflect or give effect to the new requirements of the NPS-UD.

Waimakariri 2048 District Development Strategy (WDDS)
114. The preferred growth directions for Rangiora in the WDDS 2048 (2018) are outlined above (under 'Site') i.e. westwards to Lehmans Road, and otherwise eastwards. However, the Council in its decision on the RRS, recognized west of Lehmmans Road as a potential longer town urban growth area.
115. The WDDS Rangiora Snapshot (pp38-39) -when looking ahead to 2048 proposed that:
a) Rangiora remains the District's largest town
b) 30,000 – estimated population (2048)
c) 12,025 – estimated households
d) 5,025 - new households in Rangiora
e) Continues to accommodate one third of the District's residential growth
f) 167 – estimated annual building consents for new dwellings for the next 30 years
g) 423 hectares of additional feasible residential land required by 2048 (this includes capacity in remaining stages of existing residential developments as well as new greenfield areas inside and outside of the Infrastructure Boundary)
h) Future residential growth directions proposed to the east (predominantly) and west of the current town
i) Opportunities for intensification/regeneration to be identified
j) New growth directions take into account areas of unacceptable natural hazard risk and areas of significant environmental and cultural values
k) New growth areas to connect into existing sewer and water networks

l) Stormwater Levels of Service designed to meet increased performance requirements

116. At the 2018 Census Rangiora had a population of 17,841, and 7314 total dwellings (incl those unoccupied and under construction). Population projections for the District show an average annual change 2018-2020 of 1700 persons. If Rangiora continues to attract a third of all district growth as stated in the WDSS then Rangiora's population in 2021 will be around 18,900.

Mahaanui Iwi Management Plan

117. Part 1 of the PWDP in a section "Mana Whenua" sets out the position with respect to iwi and the review of the district Plan:

a) The District's territorial area sits within the takiwā (territory) of Ngāi Tūāhuriri which is one of eighteen Ngāi Tahu regional papatipu rūnanga, constituted under the ***Te Rūnanga o Ngāi Tahu Act 1996*** *to represent* ***mana whenua*** *interests.*

b) The preparation and change of a district plan must take into account relevant iwi documents. For the District, Ngāi Tahu has set out its resource management values, issues, objectives and policies within the Mahaanui Iwi Management Plan (2013).

c) The Mahaanui Iwi Management Plan identifies objectives, issues and policies for natural resource and environmental management for six pāpatipu rūnanga (including Te Ngāi Tūāhuriri Rūnanga). It seeks to ensure that the taonga and resources of Ngāi

Tahu mana whenua are recognised and protected in the decision-making of statutory agencies. The Mahaanui Iwi Management Plan contains a comprehensive suite of policies and objectives addressing the range of resource management matters of significance to tangata whenua. The District Council shall have regard to the Mahaanui Iwi Management Plan when preparing or changing the District Plan, to the extent its content has a bearing on resource management issues of the District.

118. The Mahaanui Iwi Management Plan (MIMP) 2013 was released on 1 March 2013.

119. The MIMP is a tool for tangata whenua to express their identity as manawhenua and their objectives as kaitiaki, to protect their taonga and resources, and their relationships with these. The MIMP seeks to ensure that these taonga and resources are recognised and protected in the decision-making of agencies with statutory responsibilities to tangata whenua. Importantly it is also a tool that assists Papatipu Rūnanga representatives to articulate their values, issues and policy into statutory processes.

120. The MIMP includes both general objectives and policies about the management of land, air, and water, and also includes catchment specific objectives and policies.

121. Section 5.3 Wai Maori (pp77-98) contains an extensive discussion about tangata whenua rights and interests in freshwater. It provides a suite of Issues, Objectives and Policies for freshwater

122. Section 5.4 Papatuanuku (pp101-124) sets out the Ngai Tahu Subdivision and Development Guidelines that are to be read along-side objectives relating to:

a) Land use planning and management in the takiwā reflects the principle of Ki Uta Ki Tai. (from the mountains to the sea)

b) Rural and urban land use occurs in a manner that is consistent with land capability, the assimilative capacity of catchments and the limits and availability of water resources.

c) Inappropriate land use practices that have a significant and unacceptable effect on water quality and quantity are discontinued.

d) Ngāi Tahu has a prominent and influential role in urban planning and development.

e) Subdivision and development activities implement low impact, innovative and sustainable solutions to water, stormwater, waste and energy issues.

123. Section 5.5 Tane (pp127-137) includes objectives that focus on:

a) Regional policy, planning and decision making in the takiwā reflects the particular interest of Ngāi Tahu in indigenous biodiversity protection, and the importance of mahinga kai to Ngāi Tahu culture and traditions.

b) The customary right of Ngāi Tahu to engage in mahinga kai activity is recognised, protected and enhanced…

c) Customary use, and therefore mahinga kai, is given effect to as a first order priority for freshwater management in the takiwā.

124. Section 6.4 (pp213-224) addresses issues of particular significance to the lands and waters of the Waimakariri catchment within which the Site lies.

125. Relevant Objectives relating to urban development of land in that catchment include:

a) The natural "energy, vitality and life" of the Waimakariri River as a braided river is protected and restored.

b) The discharge of contaminants to the Waimakariri and its tributaries is eliminated.

c) Water quality and flows in the Waimakariri and its tributaries are improved to enable whānau and the wider community to have places they can go to swim and fish.

d) The mauri and mahinga kai values of the Waimakariri and its tributaries and associated springs, wetlands and lagoons are protected and restored; mō tātou, ā, mō kā uri ā muri ake nei.

126. A key issue relating to subdivision and development is that subdivision and development activities in the lower catchment

have the potential to adversely affect Ngāi Tahu values such as waterways, mahinga kai and sites of significance (Issue Wai4).
127. The proposal provides for full urban reticulation of the three waters and is consistent with the objectives and policies contained in Chapters 5.3 and 5.4 of the MIMP. The proposal does not preclude individual land owners from installing rainwater collection and use from roof areas at the time of building development.
128. The proposal has been designed taking into consideration the potential effect of resultant subdivision and development on the rivers and streams that flow into the lowland rivers.
129. Overall it is considered that the proposal will not have adverse impact on the cultural values of iwi as set out within the MIMP.

SECTION 32 ASSESSMENT

130. A Section 32 assessment is contained in **Appendix 3.**
131. In summary, the PWDP zoning and associated rules (RLZ Zone with a minimum lot size for subdivision and a dwelling 4ha) do not meet the needs and aspirations of the current owners.
132. Strategic Council planning documents (specifically the WDDS) have a focus on only meeting urban growth demands within urban environments of existing towns. They favour intensification (15hh/ha) and a strict allocation of capacity by development areas. It is a control and command regime consistent with Map A of Chapter 6 of the CRPS but is out of step with the requirements of the NPS-UD which requires a more flexible, responsive approach, prohibits a hard fixed unmoveable urban/rural boundary.
133. This approach leaves little room for new proposals or proposals that do not sit square with the standard array of GRZ/medium density or SETZ (Settlement Zone). SETZ applies to some of the District's smaller settlements outside Greater Christchurch.
134. Neither LRZ nor Large Lot Residential (LLRZ) as notified in the PWDP is an efficient use of this block of land located as it is immediately adjoining the urban area of Rangiora, and in a location easily accessible to the town centre by active transport modes as well as car and several district reserves.
135. If this Site is not zoned for LLRZ D2 (minimum average lot size 1500m^2) use to enable residential re-development then it will drive pressure to re-zone elsewhere. That step potentially will not have the significant benefits to Rangiora long term in relation to enabling a well-functioning urban environment that enables people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future. Additionally re-zoning to LLRZ D2 will contribute to providing additional development capacity to meet the different needs of people and communities in a planned manner and consistent with the NPS-UD.
136. The Site can readily be developed to reflect the principles of the Urban Design Protocol with values of character, context, and connectivity.
137. The Section 32 assessment concludes that the proposal to re-zone the Site from LRZ zone to LLRZ D2 Zone (average lot size 1500m_2) is the most appropriate method for achieving the objectives of the proposal, than the other alternatives considered.
138. Option 2 identified in the s 32 assessment is consistent with some PWDP policies notwithstanding that it does sit square with the strategic intentions signaled in the WDDS and the PWDP approach to providing for development capacity and urban development.
139. Option 2 identified in the s 32 assessment to re-zone the Site is the most appropriate given:
a) The proposals adopt the PWDP zones, development and activity standards with appropriate amendments. This ensures continuity of the District Plan anticipated environmental outcomes and urban amenity for Rangiora and adjoining residential areas;
b) Will be consistent with and give effect to many of the relevant PWDP objectives and policies;
c) It is a logical extension to the developed and developing residential land adjoining the Site while achieving a compact, efficient urban form that removes pressure on isolated rural land elsewhere around Rangiora.
d) It gives effect to the NPS-UD, specifically Objective 6 c) and Policy 8, delivering significant additional development capacity and contributing to a well functioning urban environment.
e) It is assumed that there will be capacity in the public utilities and the existing road network, including planned upgrades, to accommodate the traffic effects of the redevelopment;
f) The proposed Site specific ODP will provide certainty of the final form and disposition of the re-zoned area including its proposals for reserves, roading, future linkages for pedestrian and vehicular traffic.
140. The re-zoning proposal is considered to be appropriate to achieve the sustainable growth and development of Rangiora.
141. The economic, social and environmental benefits of the proposed rezoning outweigh any potential costs.
142. The overall efficiency and effectiveness of the proposed rezoning (Option 2) is high, in comparison to the alternative options set out in the s 32 Assessment which are low (Options One and Four) or low to moderate (Option Three).
143. The PWDP proposes to release land for development in the new Development Areas at Rangiora and Kaiapoi through a novel and untested certification process that is not clearly derived from RMA statutory powers, nor Local Government Act 2002 (LGA) authority. This approach is not proposed for the LLR Overlay areas. As the proposed Lehmans Road LLR D2 zone proposed by this submission seeks large lot urban densities, it is anticipated that Council may favour the certification process if it accepts the proposed rezoning. This is opposed – rezoning to LLRZ D2 is sought.
144. Potential difficulties with the proposed certification process are identified and discussed in the Section 32 Assessment.

(**Appendix 3)**. In summary, the process is hugely discretionary, does not provide conventional rights to an applicant (eg right of objection/appeal) meaning decisions cannot be challenged, and it is not apparent that the process will be appropriately documented with a transparent record of the decision-making within the certification process. Further uncertainty arises in the practicalities of how to negotiate and manage the staging, funding and building of key infrastructure across a range of Sites, and a risk that land supply is controlled by a limited number of large developers. It is a far less efficient and effective method for delivering land for housing than the Council rezoning the land in the PWDP.
145. The proposed rezoning is considered to be the most appropriate, efficient and effective means of achieving the purpose of the RMA.

CONSULTATION
146. The landowners and their consultants have submitted on the WRRS and the WDDS (**Appendix 4)**.
147. The submissions to re-zone as rural residential or identify the Site as suitable for LLRZ have been rejected as noted above. LLRZ but at higher densities as now proposed is considered to be a more efficient use of the land and better meets market demand. 5000m^2 sites provide more land is needed for a spacious home and garden.
148. The landowners have been consistent in their wish to find a zone and possible land uses better suited to their needs.

CONCLUSION

173 The submission seeks to rezone 58 ha of land adjoining Rangiora from Lifestyle Rural Zone (LRZ) to Large Lot Residential with a specific density standard (LLRZ D1), minimum average lot size 1500m^2.
149. The Site has a long history of rural lifestyle use. It is not significantly restricted by potential natural hazards especially flooding, nor does it have physical limitations for development for residential purposes as it is not liquefaction prone, and has no known geotechnical limitations but does contain an area of LUC 2 soils. It is near a site of significance to iwi (SASM – 025) being the Rakahuri/Ashley River The Site has access to a collector road and is near to a strategic road giving direct access to the town centre and a range of community amenities and facilities.
150. The Site immediately adjoins the urban area of Rangiora, and is well located to join in to Council utility services. It is well suited for conversion to residential use.
151. The Site is not identified within the westward growth direction for Rangiora in the District Development Strategy 2018 nor is it part of the DEV-WR development area which adopts Lehmans Road as its western boundary. It is in a location that achieves coherent and compact urban form offering ease of access to business services, community facilities, reserves and the primary road network.
152. The proposed rezoning provides for a connected and high amenity residential living environment not presently available under the PWDP while avoiding and/or mitigating any potential adverse effects on the environment. It will provide for continuing high demand for a variety of high quality residential sections aimed at a particular segment of the housing market in an ideal location, easily accessible to the existing town centre services and facilities. It will broaden the range of housing available. As such, it is consistent with the NPS-UD including Objective 6c) and Policy 8, to be responsive to proposals which supply significant development capacity and contribute to a well functioning urban environment.
153. The use of this Site for residential purposes can be a sustainable and efficient use of land and infrastructure. The proposed rezoning better provides for the social, economic, environmental well-being of the landowners and the Rangiora community than continuation of the current low intensity lifestyle land use on 4ha blocks, or a conventional LLRZ residential use.
154. Any potential adverse effects of the implementation of the proposed rezoning can be assessed at subdivision stage but there has been no restriction on servicing the blocks to date. Capacity will need to be confirmed for infrastructure, power and road network. Any future subdivision of the Site will need to confirm water supply and wastewater treatment and disposal options.
155. Rezoning of the site to LLRZ zone is not inconsistent with the policies and objectives of the PWDP, but it is at odds with the dated CRPS approach to provision of urban growth and housing capacity for Greater Christchurch, to the extent that it is not within an FDA created by Change 1 to the CRPS and is not identified as an LLRZ site under the strategic RRS prepared by the Council.
156. As the proposal helps achieve the purpose of the RMA, and has been shown to be consistent with the relevant provisions of the NPS-UD, the submission can be accepted by Waimakariri District Council.

Original Submission

Summary Reasons for the Submission

The reasons for our submission are outlined below.
a) The preferred relief (**the proposed rezoning**) is both appropriate and necessary to achieve sustainable growth and

development of Rangiora and the District and meet the requirements of the National Policy Statement for Urban Development 2020 (**NPS-UD**).

b) The Site identified in Figure 1 and at para 1 of the Preferred Relief above is a logical and preferred location that lends itself to a specific type of housing development not provided within the PWDP as a residential option adjoining but outside the existing urban areas. Nowhere is it possible to develop in a comprehensive, coordinated way a low density, high quality residential environment in the District's towns, the Rural Lifestyle Zone or Settlement Zone as a permitted activity.

c) The requirement for 12/15 hh/ha in GRZ zones (the majority of land in urban areas) drives development to modern scale relatively small urban lots best produced as a package across a significant land holding. The GRZ subdivision standards do not provide for the needs of people who seek a generous sized urban lot residential setting. This is a housing sector that is running against the planning tide of intensification but is, nonetheless, a legitimate form of housing in an appropriate setting. The barriers to such development in urban areas requires an appropriate setting/ location in the rural areas but close to or adjoining the urban areas and at a much lower density than is desired or appropriate (the PWDP LLRZ) to meet the housing needs for generous sized urban lot residential living..

d) The PWDP subdivision standards for LLRZ require lots that are very large for those whose primary interest in a rural setting is a form of residential living, not one that requires significant maintenance and management often involving animals or machinery at scale. Conversely, the GRZ subdivision standards do not provide for the needs of people who seek a large lot residential setting

e) The focus in the PWDP is on prescribing a limited range of residential options and tightly controlling and constraining housing choice within those options. Further urban growth is also tightly constrained and controlled around DEV areas around Rangiora and Kaiapoi but for a very specific form of residential development driven off density requirements that do not match the needs of all landowners.

f) The focus in most new District Plans, driven in part by the National Planning standards, is to simplify the range of zones, to standardize lot sizes, to supposedly create efficiency and certainty through ease of administration of the District Plans. This is done by constraining housing and land development choices by lot size, by location, by built standards and the disposition of built/open elements in a site. However, the National Planning standards do provide for large lot urban residential living, a residential living option which has not been taken up the PWDP (due most likely to the restrictive provisions of the CRPS which only prescribe one from of lower density residential living, at a density of 1-2 hh/ha).

g) This planning approach may be a standard approach to resource allocation but it does not provide a flexible, responsive approach to innovative and new development options. The Government is creating policy settings that on one hand seek intensification in urban areas, while at the same time pushing away from a land allocation model of planning. The PWDP in striving to face both policy directions has a package of measures that are in fact a major barrier in terms or cost, timeframes and certainties for proposals that are not cut from the suite of housing and development options set out by the PWDP. The allocation of land in preferred development areas, it must be said, runs counter to the Government's push, and now its direction, to free up land for development, to encourage innovation in housing (presently with a focus of intensification) and to make available a range of responses to the need to meet the housing needs of people and communities set out in the NPS-UD.

h) While the weight of demand (and the planning response) is around affordable housing, around small lots and dense development that supports investment in public facilities and amenities such as public and active transport, reserves, and commercial services, there is always a wide spectrum of preferences at play in the housing market. The demand for high quality, generous houses set on generous sized parcels of land within high amenity settings is an important and no less relevant housing sector. There is a strong unmet demand, as confirmed by advice from Bayleys real estate (**Appendix 5**) for larger family homes with room for a pool or similar. Purchasers want to be close the amenities of Rangiora and within walking and cycling distance of local schools. They do not want the only available options – a 4 ha lifestyle block or 5000m^2 rural residential site at Mandeville or Ohoka.

i) Interestingly enough for a nation built on the so-called quarter acre paradise, recent policy and planning interest in housing and land development has now seemingly positioned the 1011m^2 section as a luxury item, as the antithesis of providing for community well-being and needs. It is as though the old quarter acre of itself acts against building a sense of community despite being able to be developed in a planned, structured, coordinated or integrated manner. Rather than being a frivolous discretionary item in land development
and housing choice, a well-planned, well located and properly serviced low density residential environment has much to offer urban environments. They can be tactically used to provide shape and edge to urban areas, they can provide a mass of amenity different from (and potentially complementary to), but no less legitimate in urban outcome terms, to conventional GRZ zoned land.

j) In many ways the approach of a district plan to the role and place of the old quarter acre is not dissimilar to the issues faced by comprehensive retirement villages when first proposed. The idea of dense, almost gated and self-contained communities, with multi storey buildings also did not sit well in many district plans. But now they are accepted as an important part of the urban fabric catering to a specific demographic and health demographic. Most plans enable them.

k) Provision for low density residential in an urban setting, or failing that likelihood, in an adjoining rural zone is a fundamental gap in the district plan.

l) The submission seeks to provide for another housing typology not provided in the PWDP and in a location with significant planning merit. The planning case was made out in a detailed submission to the proposed Rural Residential Strategy (**RRS**) for

the land identified in this submission to be “reserved” for conventional Rural Residential zoning in the review of the District Plan. That submission was rejected in favour of a decision ascribing an unspecific strategic significance to Lehmans Road as the urban boundary; simply the decision was that rural residential development here would preclude this area as a future urban growth path, even though this was likely to be very long term as the Waimakariri District Development Strategy (WDDS 2018) for the period up to 2048, does not favour urban growth west of Lehmans Road.

Officer Recommendation

Continue to exclude the area west of Lehmans Road and the racecourse land at Rangiora as growth areas as these were originally considered but not included in the draft RRDS as they trigger the key preliminary criteria of: being on the direct edges of a main town outside of the Projected Infrastructure Boundary (PIB) thereby foreclosing more intensive long-term urban development, and…

Panel Recommendation

The panel accepted the officer recommendations to exclude areas on the fringes of Rangiora in the final RRDS due to these having the potential to foreclose more intensive long-term urban development of the town.

m) In light of the above decision on the Waimakariri Rural Residential Strategy, the proposal now is for a form of high amenity low density urban zoning, which whilst in demand is entirely absent from the PWDP. This will be a long term urban form of development. The proposal set out in the submission will achieve a compact, and efficient, urban form on the edge of Rangiora with excellent connectivity by multiple transport modes. It provides for continuous urban development by enabling a built form which can act as a strong zone or urban boundary.

n) The proposed rezoning will accommodate approximately 311 LLRZ lots1 at the proposed amended density standards for LLRZ D2 (average size 1500m^2). It will contribute to a well-functioning urban environment, meeting the NPS-UD Objective 6(c).

o) Any adverse effects on the environment arising from the proposed rezoning will be minimal, if any, and can be adequately mitigated. A high amenity master planned development is proposed.

p) Significant positive effects arise from the proposed rezoning. It will enable the short term housing demand at Rangiora to be met, and can deliver a housing typology for which there is demand, on lots that are not a burden to the landowners (which is the case for 4ha and the very limited areas of LLRZ D1 with a density of 1-2 hh/ha) and for which there is no provision in the PWDP. At present rates of land uptake there is about 4 years vacant land supply in Rangiora. Given it takes 3-5 years to bring land from zoned state to on the market as developed lots, there is some urgency in providing additional capacity. This proposal helps address an anticipated shortfall in residential zoned plan enabled land.

q) There is no additional cost to the Council in re-zoning the Site as there is expected to be capacity in the public utilities and the existing road network, including planned upgrades.

r) Amendments to PWDP objectives and policies may be necessary to provide for a higher density LLRZ, but of themselves will not act against those relating to Strategic Directions Urban Form and Development and Urban Growth. The PWDP approach to zones and
identification of future development land is already out of step with higher order Resource Management Act 1991 (RMA) statutory documents because they do not give effect to the NPS-UD (and are sought to be amended through this submission).

s) The alternatives of retaining Rural Lifestyle or Large Lot Residential zone across the entire Site are not an efficient use of land which immediately adjoins the urban area of Rangiora, and is highly accessible to the town centre by active transport modes as well as car.

t) The proposed rezoning is consistent with and the most appropriate, efficient and effective means of achieving the purpose of the RMA.

The Site

1. The Site is a 58ha block of land (‘the Site’) accessed from Lehman Road, Rangiora **(Figure 1)**. It is owned by the two submitters and 12 other landowners.

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1 Assumes 20% of land area taken for servicing including roading, reserves and stormwater management if required.

Figure 1: The site (outlined in blue (Google Earth)

2. The Site is surrounded by RLZ land that is used for a mix of lifestyle and conventional farming. To the NE is the Rangiora Eco Holiday Park, and beyond the Park is the Rangiora Racecourse about 300m away from the nearest lot and 1km from the centre of the Site. Land to the south east is GRZ and part of urban Rangiora with newly developing residential land west of West Belt. About 1.9 km to the NW is Rangiora Airfield. About 1km north of the most northern lot is the Ashley River.
3. The southern-most lot in the proposal with the Rangiora Vet Clinic faces, but does not have access to Rangiora-Oxford Road (State Highway 72). This arterial road provides the main road connection in to the centre of the town. The well-established Fernside Rural residential area is about 2.5km west from the junction of Lehmans and Rangiora-Oxford Roads.

Figure 2: the site is a broader context (Site marked red)

4. The Site is not identified as lying within a preferred growth direction for Rangiora in the Waimakariri 2048 District Development Strategy (2018) (**WDDS**) **(Figure 3)**. No land west of Lehmans Road is included in the West Rangiora Development Area (**DEV-WR**) in the PWDP.

Figure 3: Figure 11 WDDS

5. The Council reviewed its strategic approach to the location and provision of Rural Residential land (now zoned LLRZ in the PWDP) in the WDSS. It adopted the position that it would:

a) Explore tools such as cluster development to manage rural character

b) For rural residential development, adopt an approach that has a primary focus on creating new rural residential areas, with a secondary focus on enabling large lot intensification within existing rural residential areas where there is sufficient community support and servicing available

c) Review the Rural Residential Development Plan for the whole District (pg 21 WDDS).

6. Rangiora presently has a population of 17,841 (2018 Census). It grew steadily between 2006 and 2018. Growth of Rangiora since then has continued in step with the district growth which has increased 8.2% between 2018 and 2021 from 61,300 to 66,300 at an annual average of 2.8% from 2018 to 2020 (Statistics NZ Subnational population projections at 30 June 2021: provisional).

2006 (count)	2013 (count)	2018 (count)
12,165	15,069	17,841

Statistics NZ

Population projections at 30 June

PLANNING STATUS OF THE SITE

Chapter 6 of the Canterbury Regional Policy Statement

7. An assessment of the CRPS is set out in **Appendix 1** to this submission.
8. The Site is within the Greater Christchurch area.
9. It was not shown as a Greenfield Priority Area – Residential (GPA) on Map A of the Canterbury Regional Policy Statement (CRPS). The GPA terminates at Lehmans Road.
10. As a result of the Minister for the Environment's decision of 28 May 2021 on Change 1 to Chapter 6, an area largely south of Oxford Road and a finger of land to the north of Oxford Road was included as a Future Development Area (**FDA**) (**Figure 4** orange).

Figure 4: Map A Chapter 6 Regional Policy Statement Greenfield Priority areas

Site location identified with red circle (appx)

11. The FDAs are intended to accommodate the increased demand for new dwellings in that part of Waimakariri District within the Greater Christchurch Urban Area and to respond to the NPS-UD. They do not provide “plan enabled” land as they need to negotiate a rezoning process to confirm their status as land developable for housing and other urban purposes.
12. The proposal for a LLRZ zone with average lot sizes of 1500m2 is inconsistent with the policy approach of Chapter 6 for Greater Christchurch, in that if fits none of the residential living typologies provided for in Chapter 6 and is not in a location identified for urban or rural residential development. It sits ‘between’ the urban and rural residential densities provided for in the CRPS (minimum 10 hh/ha for urban in Waimakariri, and average 1-2 hh/ha for rural residential). The proposed density is appx. 6.66 hh/ha.
13. Notwithstanding, the proposal meets all the location and other criteria in CRPS Policy 6.3.9 for rural residential development. It is:

- Outside the CIAL noise contours
- Has some sites with restrictions from the take-off and landing vectors for Rangiora Airfield but not such as to impact its operational capacity.
- Is outside the groundwater protection zone
- Is not within the Waimakariri stop bank system
- Has no views of or to the Port Hills
- Has good access for emergency services
- Will not create reverse sensitivity issues with adjoining land uses; Rangiora Racecourse is 500m away.
- Free of significant natural hazards and is a flat site.
- Supports no significant natural values or ecological values.
- Contains no SASMs.
- Can be integrated into or consolidated with the existing urban area of west Rangiora.
- Contains no surface water bodies so there will be no adverse impacts on these.
- The development will be contingent on an ODP to provide integrated design for subdivision and land use, and provide for the long-term maintenance of a high quality high density rural residential character.
- The proposal is not intended as a staged development towards full urban; rather it is intended to provide a unique residential environment that can stand alone and contribute to the urban fabric of Rangiora like Palmview in east Rangiora, or as Kaiapoi Lakes does for Kaiapoi.

14. Overall, the proposal is not consistent with Chapter 6 but that is more a function of its original purpose when formulated in 2013. Notwithstanding that, the submission for a lower density residential focussed, high quality urban environment that attaches to an existing urban area and that promotes a coordinated pattern of development has planning merit.

Operative Waimakariri District Plan

15. The Site is zoned Rural in the Operative Plan. The minimum lot size for subdivision and a dwelling is 4 ha.

Proposed Waimakariri District Plan

16. The Site is zoned Rural Lifestyle Zone **(LRZ) (Figure 4).** The minimum lot size for subdivision and a dwelling in the LRZ is 4 ha.
17. Oxford Road is a strategic road and Lehmans Road is a collector road.

Figure 5: Proposed District Plan Zoning (site outlined in red)

18. The Site is also subject to, or potentially influenced by, a number of Overlays:
    a) Rangiora Airfield Take Off Climb and Approach Obstacle Limitation Surface (**Figure 6**)
    b) National Grid Transmission Lines (**Figure 6**)
    c) Liquefaction: Liquefaction damage is unlikely (**Figure 6**)
    d) Non-Urban Flood Assessment Area (**Figure 7**)
    e) Geographic areas: Ecological Area – Plains

f) Ecological District – Low Plains

Figure 6: Rangiora Airfield Take-off and Approach vectors (blue dashed lines); Liquefaction damage unlikely (green)Transmission lines (green lines); Site outlined in red

Figure 7: Non-urban flood assessment & Waimakariri Flood Hazard maps
Blue – medium risk, green – low risk, white – very low

DEVELOPMENT PROPOSAL AND PROPOSED REZONING

19. Subdivision of the Site will create approximately 311 LLRZ D2 lots.
20. The key design drivers for the proposal are:

a) A high amenity premier residential zone with large houses on large sites – average 1500m^2, min 1000m$_2$ based on the St Kilda, Hamilton development concept (**Figure 8**).

b) LLRZ D2 standards would enable a lower density zone in the medium term e.g. 10 years to achieve a high quality consistent character subdivision. If developed as an integrated development subject to an ODP subdivision can be staged for to the proposal.

c) Creating strong connections with the immediate neighbourhood by providing a cohesive interconnected roading layout that picks up direct links to the eastern neighbourhood off Lehmans Road and the northern subdivision roading, and carries them into the Site.

d) Creating a high amenity and diverse residential neighbourhood by providing interfaces to roads, reserves and rural environments.

e) Respecting and building on local identity and character of Rangiora by retaining specific vegetation features from the Site, and anchoring the development into the wider landscape.

21. A development concept can provide for sound urban design by:

a) A hierarchy of movement corridors.

b) Prioritisation of walking and cycling.

c) A north-south alignment of street blocks to maximize solar access and provide for efficient use of lots.

d) Block perimeters being kept as small as practicable to aid permeability and higher public amenity.

e) Enabling a range of housing typologies set in high quality landscape and street setting with generous amenity plantings and curtilage.

Figure 8: St Kilda development images (Bayleys)

22. St Kilda, Cambridge is a premier development on the outskirts of Cambridge, centrally located and with easy access to the Waikato Expressway. It was originally part of a small dairy operation which was dissected by the Waikato Expressway, leaving a portion within the Cambridge Town boundary and the larger balance of the property of approximately 80 ha (which became St Kilda) on the Eastern side of the Expressway, left in the Rural Zone.
23. The initial development concepts were for a Rural Residential type development given the Expressway separation of the existing residential development on the Western side of the Cambridge Bypass, however this was not supported by Council and a new concept of larger residential sections of a 1600m² average size was developed and approved – see https://www.stkilda.nz/page/location/

EFFECTS ON THE ENVIRONMENT

Township growth and urban form

24. The Site immediately adjoins the western edge of urban Rangiora.
25. The WDDS indicated a general preference for the direction of urban growth of Rangiora to the east as a way of balancing up the residential areas around the town centre and some growth to the west.
26. The approach of the WDDS was to signal growth options to be confirmed in the District Plan Review:

The broad directions for greenfield residential growth for the District's main towns are set out in Figures 11 to 14. Further work will be carried out to identify and confirm the exact locations and extent of these residential growth areas, together with the intensification opportunities within existing urban areas. These will be enabled through the District Plan Review and other planning tools.

27. The Strategic Planning documents clearly signal active consideration of growth needs and growth directions. The options available to the Council were constrained by the approach of the CRPS as the District Plan has to give effect to the CRPS and cannot be
inconsistent with it. The CRPS took effect in 2013 and is overdue for review.
28. The CRPS tightly holds urban growth to the constraints of Map A Chapter 6 and the identified FDAs which although amended by Plan Change 1 in 2020 does not respond to the directions of the NPS-UD. In any event the approach is focused on the need for housing in full urban residential land, less on other residential development forms.
29. As such the Site falls outside the planning policy framework for urban growth. However, in terms of urban form and on the ground, there is considerable merit and logic to conversion of this existing LRZ land to a new high amenity residential form that can be integrated into the Rangiora urban fabric.
30. The proposal has the potential to anticipate the longer term growth path confirmed by the decisions on the RRS to protect the future growth option of more intensive urban development in this direction. It can set a pathway to further westward expansion on land
that holds few if any physical barriers to land development.
31. The proposal will contribute to the housing needs of Rangiora and in a form and location that does not undermine the long run urban form of Rangiora. Planned growth confirmed in the PWDP is already intended to extend westwards out to Lehmans Road and to keep the town edge squared up providing depth to future development and providing a rational basis for providing movement networks driven off the key roads such as Rangiora-Oxford Roads. The West Rangiora Future Development Area confirms this approach. The Site sits in the next block west of Lehmans Road so is not proposing a disjointed urban form, nor one that is not part of the long term thinking of urban form and growth for Rangiora.

32. A full residential zoning is proposed under LLRZ D2 and will provide a high quality street character, overall amenity and passive surveillance over the street, and will create the correct lighting standards, roading standard, fully formed footpaths and cycleways required for a high quality urban environment.

Neighbourhood and wider community effects
33. The Site is serviced by a collector road and is close to an arterial road. This provides for ease of access and safe and convenient movement to and from the Site. A planned development co-ordinated by an ODP can facilitate within the site movement corridors and linkages through the Site to provide for walking and cycling.
34. A key positive neighbourhood and community effect will arise from the existing dwellings and their established gardens and plantings that will anchor new development and provide a point of reference for new dwellings. Development will not be on a bare site; it will take place in an existing established part-residential setting. The transition to a low density, high quality premier residential development will start from a favourable position and minimise the apparent extent and nature of the landscape change.
35. The Site is comparatively large (58.4 ha) and has the potential to support a variety of residential building typologies and this will contribute to a mix of households within the development and provide built form variety and interest in the streetscape. Whilst LLR D2 standards are proposed, it may be that part of the Site is suitable for other higher density forms of development, which would be within scope of the alternative relief, and could be considered as part of the master planning process required for preparation of an ODP (ahead of the hearing). The earlier stages of the St Kilda development were for large lot residential, with more clusters of townhouses included as later stages (and a retirement village). A retirement village is unlikely in this case, given the proximity of the Charles Upham Retirement Village.
36. Rangiora is well-positioned to accommodate and service the needs of a fast-growing resident population that will in turn support more business activity, schools, community facilities and community organisations.

Effects on tangata whenua values
37. The Proposed District Plan does not identify any Sites and Areas of Significance to Maori in the Site, but the nearby Rakahuri/Ashely River identified as SASM-025. This has been scheduled as being
River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species
38. The PWDP has Policy SASM-P8 which is relevant to pre-development processes:
Engagement with rūnanga
Te Ngāi Tūāhuriri Rūnanga and the District Council to encourage engagement with the Rūnanga priorto persons undertaking activities and/or applying for resource consent where the activity has thepotential to adversely affect identified sites or areas of Ngāi Tūāhuriri cultural significance. Where priorengagement with Te Ngāi Tūāhuriri Rūnanga h as not been undertaken by an applicant for an activitythat has the potential to adversely affect an identified site, the District Council will consult with the Rūnanga.
39. The Site is not listed as an archaeological site on the NZ Archaeological Site database.

Landscape and visual effects
40. Rural Lifestyle style development exists on the Site now (a series of 4 ha lots with a dwelling and associated accessory buildings on each). The landscape is dominated by shelter belts, utility buildings, significant trees and planted curtilages around

dwellings many of which are well set back off the roads down RoWs.
41. An ODP will help to achieve an integrated, cohesive and coherent development The proposal will lead to a modification of the landscape of the Site from a predominantly lifestyle block landscape to a denser semi-urban environment dominated by residential building that will, in time, get the benefit of street tree and reserve plantings and landscape treatments around the houses.
42. The visual effects which will arise from a change in the number of vegetative and built elements in the landscape are significant, but not avoidable, if the Site is to contribute to the on-going growth of Rangiora. The change will contribute to a high quality amenity and quality of environment and one that will be entirely consistent with and supportive of the rural lifestyle residential development that has successfully established on the Site.

Well-functioning urban environments
43. The Site adjoins the existing built up urban area of Rangiora. Immediately to the east are existing or developing residential areas.
44. The conversion of the Site from present rural lifestyle uses to low density, high quality residential will continue a pattern of outward expansion of Rangiora. Such a change may not be consistent with the PWDP's identification of a Future Development Overlay for west Rangiora only as far west as Lehmans Road, but on the ground it will look and integrate as part of the urban fabric.
45. It will provide some replacement lower density living areas for the existing LLR zones at north west Rangiora – but at much more appropriate higher density that the LLR D1 standard which is 1-2 hh/ha. There are two such areas, shown on the planning maps below. River Road has an 'urban overlay' and is intended to be intensified to urban densities. The land on the opposite (east) side of Lehmans Road is a 'legacy' rural residential zoning which applies under the Operative District Plan. The landowners have developed the adjoining residential subdivision and wish to develop the land for full urban residential development. Services are in place to support this. The constraint to date has been Map A of the CRPS which does not include the land as a Greenfield Priority Area or Future Development Area, GR zoning of this land is consistent with the NPS-UD.

Figure 9: PWDP as notified – LLRZs shown in light grey. Diagonal stripes – urban growth overlay.
Site outlined in red.
46. Rangiora is growing apace. It is attracting significant interest from new home buyers as people respond to the significant investment in upgraded transport links (Northern Corridor and public transport) and a growing economic base for employment within the District and the City.
47. Rangiora has excellent connectivity to the City, both via the new Northern Corridor, and a nascent cycleway link into the City. There is a very regular bus service every half hour.(the No 1 Blue Line) The standard trip takes 70 minutes, and there is a twice daily weekday morning express service from Rangiora, and seven times weekday express out to Rangiora all via Kaiapoi.
48. The Site will step out the western edge of Rangiora, but as it exists in a peri-urban form now, such a change does not alter how the Site interacts with Rangiora as a whole. It is in many ways a functional part of urban Rangiora now; it's only the Zone boundaries and policy framework that create the sense of it not being part of Rangiora.
49. The Site is convenient to the Rakihura/ Ashley recreation trails, the racecourse, Arlington Park, and the airfield. The town centre is easily accessible.
50. The following assessment of the criteria in the NPS-UD for determining a well-functioning urban environment shows that the proposed rezoning will deliver urban, housing and residential outcomes that meet those criteria. There will be a variety of homes enabled by generous lot sizes. The Site is well-positioned, building as it does on an existing township well-serviced by public transport and cycling options, to provide good accessibility to jobs, community services, and open spaces, as well as mitigating climate change impacts and future natural hazards by being not near the coast and well removed from major rivers.

NPS-UD Policy 1	
Planning decisions contribute to well functioning urban environments, which are urban environments that, as a minimum:	**Assessment**

(a) have or enable a variety of homes that: (i) meet the needs, in terms of type, price, and location, of different households; and (ii) enable Māori to express their cultural traditions and norms;	The proposal is to have larger lots supporting predominantly standalone dwellings and associated accessory buildings (including generous sized garaging) in an open landscaped garden setting. This will fill a gap in the range of housing typologies available at Rangiora and contribute to a better functioning urban environment overall at Rangiora. It is not necessary for each individual rezoning proposal to have a wide range of housing typologies, and in some circumstances this may not be appropriate. The rezoning will deliver a premier high amenity urban subdivision with generous sized lots which will complement existing and planned higher density residential development at west Rangiora. There is scope with the relief sought for a mix of residential densities. The appropriateness of this can be considered at the master planning/ODP stage. The Site has the potential to create a unique urban environment in Rangiora. It can follow the example of Palmview based on a lake or Kaiapoi Likes providing a niche housing option in Rangiora and the District meeting a need for residential land not constrained to GRZ standards.
(b) N/A business sectors	
(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and	The Site has access to a collector road and a strategic road providing easy access to key community amenities and facilities. The town is served by a public bus route to the city, and a cycle trail connecting to Kaiapoi and the City. The new West Rangiora Development Area adjoins the Site to the south. The Site will become closer to Rangiora public transport routes as they extend out to service this new growth area over time. The Site is in walking distance to Arlington Park and the Rakahuri/Ashley which contains abundant recreations pace. It is easily accessible to the town centre and within walking distance to the Huntingdon Drive local centre.
(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and	The demand for housing and land in Rangiora is largely ahead of the planning means to respond. This proposal will “top up” the land presently set aside in the PWDP and provide a useful buffer to demand. The Site owners have been keen to release this land for more intense development for some time; there is no prospect of land banking.
(e) support reductions in greenhouse gas emissions; and	The Site has significant advantages in being easily accessible to the town centre and reserves, community facilities and schools. The proposal retains a consolidated form to Rangiora with good connectivity and linkages to recreation space and commercial centres reducing the need for car travel.
(f) are resilient to the likely current and	The Site is within the area of influence of a major river but the non-urban flood assessment maps do not show extensive flooding likely at the Site.

future effects of climate change	Being inland it is not at risk from climate change induced extreme natural hazard events like sea level rise. or river flooding.

Effects on ecosystems and habitats

51. The Site is currently used for a mix of low intensity (grazing) farming, and lifestyle purposes. Shelter belts and utility buildings have been established

52. The Site has been identified in the PWDP with two ecological overlays (the PWDP ecological overlay – Plains and Low Plains Ecological District). They are a district-wide overlays and no specific ecological values have been identified in the Proposed Waimakariri District Plan. These overlays seek primarily to retain indigenous vegetation. The PWDP identifies SASM 025 nearby the Site. That is a Site and Area of Significance to Maori and in SASM - Schedule 1 is identified as *being River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species.*

Effects on natural and physical resources

53. The Site drains in a SE direction towards the newly developing residential area.

54. There will be a degree of site disturbance as part of creating the roading network, and reserves, and as part of curtilage development on each lot.

55. The proposed use for residential activity inevitably leads to loss of some rural productive potential as land owner intentions are not about farming or productive use of the land, but lifestyle use and enjoyment. Built forms and hard surfaces become more dominant.

56. The Site comprises 4ha bocks now and these are not able to be used effectively for productive purposes other than for intensive productions based on tunnel housing and other supported production systems. None exist in the Site now.

57. The Site contains Class 2 and Class 3 soils as defined in the NZ Land Use Inventory (Landcare Research) Land Use Capability classes 1-3 **(Figure 10)**. Productive use of these soils other than for low level purposes i.e. grazing, is not feasible given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production).

Figure 10: Site soils: Site outlined in red; (Canterbury Maps)
Class 2 soils: bright green/Class 3 soils: light green;

Discharges of contaminants into the environment

58. There will be no discharges of contaminants into the environment. Wastewater will discharge to the Council's reticulated system.

59. Stormwater discharges will potentially be to ground given ground conditions or to an approved and consented stormwater management and treatment area which will meet all relevant Council standards.

Risks from natural hazards or hazardous installations

60. The PWDP planning maps show the Site as being within a Non-Urban Flood Assessment Area.

61. The District Plan maps do not identify high flood hazard areas or high coastal flood hazard areas, rather these are identified through the flood assessment certification process. This enables the most up-to-date technical information to be used. However, as a guide, areas that are potentially high hazard can be identified through the Waimakariri District Natural Hazards Interactive Viewer (NH - Introduction).

62. Rules that refer to a Flood Assessment Certificate require a certificate to be obtained from the District Council to determine compliance with the relevant rule. The alternative is to apply for resource consent as set out in the rule.

63. Rule NH-R2 states
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;

64. Assessment of flood risk and consequence can be undertaken at subdivision stage.

65. There will be no hazardous installations proposed on the Site.

Geotechnical assessment
66. The PWDP planning maps show the Site as being “Liquefaction damage is unlikely. Standard investigation procedure outlined in NZS3604 is appropriate”.

Contaminated land
67. A Preliminary Site Investigation can be carried out for the Site at subdivision stage.
68. An enquiry of ECAN has identified that two sites at the northern end of the Site potentially contain some contaminated land, which can be investigated further at subdivision stage **(Appendix 6)**. 315 Lehmans Road is an unverified HAIL site (previous use for clay target shooting) and 317 is registered as containing uninvestigated persistent pesticide bulk storage.

Servicing
69. Proposals for servicing the Site and the effects from such servicing in relation to domestic water supply, wastewater, stormwater, roading, and telecommunications will be required for any subdivision consent.

Economic effects
70. It is anticipated that urban development will generate positive economic effects, both from the investigation/development phase and for the longer run economic activity from householders participating in the local economy.

Climate Change effects
71. An assessment of the effects of the proposed rezoning on climate change is included as part of the assessment of a well-functioning urban environment above.
72. A well-functioning urban area that is designed and serviced in an integrated manner, applying sound urban design principles, will enable a reduction in greenhouse gas emissions compared to unplanned, ad hoc development that does not create compact urban forms located where the services and benefits of existing, established urban areas are not readily accessible.
73. There is a triangle of planning influence that can be brought to bear on reducing greenhouse gas emissions
a) Compact urban form minimising distances between homes and work/play options.
b) Proximity of homes to community facilities, services and amenities and business/work areas.
c) Design and provision of movement corridors and linkages that create opportunities other than for vehicles for getting around.
74. The Site of the proposed rezoning:
a) Helps in retaining a compact urban form to Rangiora.
b) Is easily accessible to the town centre and is located convenient to the recreation resources of the nearby Rakahuri/Ashley River, the airfield and racecourse and Arlington Park.
75. Rangiora has excellent connectivity to the City, both via the Northern Motorway, the new Northern Corridor, a cycle way link to Kaiapoi which is linked to the new north city cycle way along the Northern Corridor and a very regular bus service.

Positive effects
76. The proposed rezoning will provide for the continued growth of Rangiora by managing the development through an ODP. The proposal will provide a buffer to on-going high level demand for lots in Rangiora. It will cater for a specific housing need not found in GRZ Zoned land nor LLRZ land. The proposed rezoning is anticipating a form of development that is a much more efficient use of a qualifying site supporting a well-functioning urban area. It is a positive endorsement of Rangiora as a growth node in the District.
77. The benefits derived from a planned ODP approach include facilitating high levels of connectivity, creating community links to identified focal points. The Site is close to recreation facilities. A coordinated and integrated development will provide a distinctive environmental quality and point of difference to the development.
78. The Site adjoins existing and developing residential development on the western edge of Rangiora.
79. From a community well-being perspective, the provision of additional land for residential growth will continue to support the Council’s investment in community infrastructure by maintaining and facilitating growth rates, increasing the rating base and attracting development contributions.

STATUTORY PLANNING ASSESSMENT
80. Submissions must be assessed under the provisions of the RMA, including Part 2 and Section 32 (Requirements for Preparing Evaluation Reports).

National Policy Statements
National Policy Statement on Urban Development Capacity (NPS-UD)

81. The NPS–UD applies to this proposal as it is directed at Tier 1 urban environments, and Tier 1 local authorities which includes Waimakariri District as part of the Christchurch urban environment that is defined in Table 1 of the NPS, and additionally defined as:

any area of land (regardless of size, and irrespective of local authority or statistical boundaries) that: is, or is intended to be, predominantly urban in character; and is, or is intended to be, part of a housing and labour market of at least 10,000 people.

82. The NPS-UD recognises the national significance of:

a) Having well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future; and

b) Providing sufficient development capacity to meet the different needs of people and communities.

83. The NPS outcomes are to be achieved through objectives that address:

a) Planning decisions improving housing affordability by supporting competitive land and development markets.

b) Regional policy statements and district plans enabling more people to live in areas of urban environments near centres or areas with employment opportunities, area well serviced by public transport or a high demand for housing in the area.

c) Urban environments developing and changing over time in response to diverse and changing needs of people, communities and future generations.

d) Local authority decisions on urban development being integrated with infrastructure planning and are strategic over the medium term and long term.

e) Local authority decisions on urban development are responsive particularly for proposals supplying significant development capacity.

f) New Zealand's urban environments support reductions in greenhouse emissions and are resilient to current and future effects of climate change.

84. The key method to achieve these objectives is by development of a Future Development Strategy (FDS). This will set out how the Councils will provide for sufficient development capacity over the next 30 years to meet expected demand. There is no FDS for the greater Christchurch Urban Area that meets the requirements of the NPS-UD.

85. Work on development capacity completed for the NPS - UDC 2016 by the Greater Christchurch Partnership as an Update of the existing Urban Development Strategy (UDS) – Our Space 2019 confirmed what there was a shortage of feasible development capacity for future housing in Waimakariri District for the medium (next 10 years) and long term (10 to 30 years) periods. That assessment is now out of date as it does not address the requirements of the NPS-UD; and rates of take up of land have exceeded projected rates.

86. One of the key changes in the NPS-UD is that local authority decisions on urban development that affects urban environments are responsive, particularly to proposals that would supply significant additional capacity. It also amends the required methodology for housing and business capacity assessments.

87. The current CRPS does not meet the new NPS-UD requirement in relation to proposals for significant additional capacity. Regional councils are required to include criteria in the RPS to determine what plan changes will be treated for the purposes of Policy 8 as adding significantly to development capacity as soon as practicable. ECAN has yet to respond to this requirement.

88. The NPS-UD has immediate effect, so in the meantime, proposals such as this submission must be assessed in the context of the overall intent and purpose of the NPSUD as articulated in the NPS-UD objectives and policies. This includes that NZ has well-functioning environments; provides sufficient development capacity to meet the different needs of people and communities; planning decisions improve housing affordability to contributing to competitive house and land markets; and RMA plans enable more people to live near major employment areas, where there is existing or planned public transport, and where there is high demand for housing.

89. The NPS-UD is the higher order document and its requirements override those of lower order documents where there is a conflict, including regional and district RMA plans.

90. Key objectives and policies in the NPS-UD are assessed here:

NPS-UD Objective/Policy	**Assessment**
Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	The proposed development will further enable Rangiora to sustain itself as a well-functioning urban environment by consolidating the residential area close to the town centre, and provide residential development close to public transport links and existing community and commercial facilities including Huntingdon Drive local centre. The proposal provides choices in the Rangiora housing market and in doing so

Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.	supports housing affordability. Whilst the proposal is for a premier larger lot urban residential development, it is important that all sectors of the market are catered for. This will be more affordable than forcing those wanting large sections out to the much larger and very limited areas of LLR D1 development, or having to purchase 2-3 sections in a standard residential subdivision. There Site is in multiple ownership and the landowners are working together to achieve the rezoning. It will bring more competition into the market by bringing new entrants into the market.
Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply: the area is in or near a centre zone or other area with many employment opportunities the area is well-serviced by existing or planned public transport there is high demand for housing or for business land in the area, relative to other areas within the urban environment.	The CRPS is due for review in 2024 but in the meantime the existing CRPS is not in accordance with the NPS-UD 2020. The proposed rezoning is on the edge of the District's largest centre, which offers a wide range of community and business services, and employment opportunities. It is expected that a proportion of future residents will commute outside the township, but as the township and associated business areas e.g. at Southbrook, continue to grow, this is expected to become proportionally less. Rangiora is well serviced with public transport, there is scope for future mass transit PP, and there is a high demand for housing at Rangiora. The Site adjoins the new West Rangiora Development Area, to the south. Extensions of public transport to service this growth area will be readily accessible to the Site.
Objective 6: Local authority decisions on urban development that affect urban environments are: integrated with infrastructure planning and funding decisions; and strategic over the medium term and long term; and responsive, particularly in relation to proposals that would supply significant development capacity.	Whilst not currently identified as a future growth area in RMA documents, the Site is well placed at the township edge to be serviced by existing infrastructure. Some upgrades may be required, which will be investigated further with Council prior to the hearing. See Policy 8 below for commentary on proposals which supply significant development capacity
Objective 8: New Zealand's urban environments: support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change	The proposal adjoins the existing built up are of Rangiora, close to public transport links. Its excellent accessibility to Christchurch City, substantially enhanced with the new Northern Motorway extensions, means it is now highly accessible to these nearby major employment areas. Travel distances are relatively short, minimising vehicle miles and the potential for greenhouse gas emissions. There is a cycleway link from into Christchurch City, and regular bus services, including an express route. The Site is inland and not subject to natural hazard risks associated with sea level rise arising from climate change.
Policy 1 – Planning decisions for well-functioning urban environments	Assessed at para 41-50
	The proposed rezoning is anticipated to provide sections that will be available for the short term (up to 3 years) and into the medium term (3-10 years) if adopting a more conservative outlook.

Policy 2 - Sufficient development capacity Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.	The locational and amenity advantages of Rangiora also favour strong ongoing demand. The PWDP UFD-O1 Feasible Development Capacity for residential activities identifies the need for 6300 residential units in the period 2018-2028, and 7100 residential units 2028-2048. These numbers are derived from Chapter 6 CRPS Table 6.1. and are out of date. Data from the Council (November 2021) confirms that there are about 800 vacant lots in Rangiora. Building consents are at about 180/year. That means there is about 4 years vacant land supply. A lead in time of 3-5 years is needed to go from rezone to house build so the Council is facing an unnecessary squeeze on land availability. That will translate in to an upward shift in land and section prices as has been the case at Rolleston. The data suggests that the PWDP will be late to the party to ensure there is at least sufficient development capacity to meet expected demand for housing land over the short term, medium term, and long term. There is a looming, inevitable land supply issue so any proposal to add capacity will push the Council closer to meeting the requirements of the NPS-UD. The proposal is consistent with ensuring there is at least sufficient land supply for housing.
Policy 8 – Responsiveness to plan changes Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is: (a) unanticipated by RMA planning documents; or (b) out-of-sequence with planned land release	The proposed rezoning is not anticipated by RMA documents - it is not a Greenfield Priority or Future Development Area in the CRPS, or a New Development area in the PWDP. A responsive approach to the proposal is required as it meets the Policy 8 criteria for unanticipated zoning. It will contribution to well functioning urban environments and will add significant development capacity. There is no development capacity for the housing typology proposed – so any provision is significant in this context. The development will deliver appx 311 high amenity large lot residential sites at an average density of 1500m2. This will be higher if a mix of densities are proposed, which may be appropriate in some parts of the Site, dependent on master planning work to follow.

91. Adopting the submission to re-zone the land, and enable the proposed development on the submission Site will satisfy the objectives and policies of the NPS-UD.

Proposed National Policy Statement for Highly Productive Land (NPS-HPL)

92. The Government proposed in 2019 a NPS-HPL to prevent the loss of productive land and promote its sustainable management. The overall purpose of the proposed NPS-HPL is to improve the way highly-productive land is managed under the Resource Management Act 1991 (RMA) to:

a) Recognise the full range of values and benefits associated with its use for primary production
b) Maintain its availability for primary production for future generations
c) Protect it from inappropriate subdivision, use, and development.

93. The NPS-HPL is still a proposal and not intended to take effect until after Gazettal. At the date of this submission the NPS-HPL has no effect and no assessment of it is required for the purposes of this submission.

94. The Proposed NPS-HPL interim definition of HPL is land defined as Land Use Capability Class 1-3 soils. A portion of the Site contains Class 2 and 3 soils (see **Figure 10)**. Highly productive use of these soils is not realistic given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production). Its present use as lifestyle blocks, low level grazing and agistment is the more likely long run use of the Site if not rezoned.

95. Objective 3 of the Proposed NPS-HPL specifically refers to highly productive soils being protected by avoiding *"uncoordinated urban expansion on highly productive land that has not been subject to a strategic planning process"*.

The Site was assessed through a strategic planning process (WDDS 2018) and the RRS as a preferred site for LLRZ development, and rejected for a change in zoning on the basis that it may be required for long term urban growth of Rangiora.
96. It is therefore considered that this submission to re-zone the Site is largely in accordance with the Proposed NPS-HPL.

National Planning Standards

97. The National Planning standards prescribe various matters under the RMA so that there is consistency among planning documents most relevantly here in terms of appellations for zones, and the standards applying to these zones.
98. The proposed rezoning adopts the standard zone appellation, in this case LLRZ as contained in the PWDP.
99. The PWDP identifies plan standards for minimum and average net site areas for the respective zones. These are modified for the proposed rezoning as a higher density LLRZ.
100. The higher density LLR zoning is entirely consistent with the NPS purpose for the LLRZ as reproduced below. In this case, the principal constraint to more intensive development is the peri-urban location where a lower density transition to the rural environment is appropriate (particularly noting that the zone boundary is 'mid block' so there is no natural or physical buffer between rural and residential areas); the existing pattern of 4 ha lots with existing substantial homes and gardens; and the fact that the premier large lot subdivision proposed relies on consistency of housing quality and character to be deliver on this vision for the area.

Large lot residential zone

Areas used predominantly for residential activities and buildings such as detached houses on lots larger than those of the Low density residential and General residential zones, and where there are particular landscape characteristics, physical limitations or other constraints to more intensive development.

Low density residential zone

Areas used predominantly for residential activities and buildings consistent with a suburban scale and subdivision pattern, such as one to two storey houses with yards and landscaping, and other compatible activities.[2]

Canterbury Regional Policy Statement 2013 (CRPS)

101. Chapter 6 of the RPS *"provides a resource management framework for the recovery of Greater Christchurch, to enable and support recovery and rebuilding, including restoration and enhancement, for the area through to 2028. Recovery in Greater Christchurch is also supported by the provisions in Chapter 5 notated as 'Entire Region'. The provisions in the remainder of the RPS also apply.3"*
102. An assessment of the proposed rezoning against the relevant CRPS Objectives and Policies is set out in **Appendix 1**. This should be read in the context of the CRPS being overdue for review and that it does not provide a regional response to the NPS-UD. The
need to focus on earthquake recovery has now passed and so many of the directive provisions need to be given appropriate 'weight' in a new national policy environment with a focus on flexible, responsive panning approaches that better provide for people's needs and well-being.
103. That assessment shows that

a) The development proposal achieves the objectives for the location, design and function of new developments (Objective 5.2.1)

b) The traffic effects of the proposal are unlikely to give rise to adverse effects and so achieves CRPS objectives for the strategic land transport network (Policy 5.3.7)

c) The Site falls outside the FDAs shown on Map A of Chapter 6 and in that regard is inconsistent with RPS Policy 6.2.1 clauses 1 to 3.

1. identifies priority areas for urban development within Greater Christchurch;

2. identifies Key Activity Centres which provide a focus for high quality, and, where appropriate, mixed-use development that incorporates the principles of good urban design;

3. avoids urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS

d) The environmental effects assessment outlined above establish that the proposed development is consistent and will not give rise to any concerns with respect to all the matters listed in RPS Policy 6.2.1 clauses 4. to 11. These matters are:

6.2.1 Recovery framework

Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that:

1. As above;

2. As above;

3. As above;

4. protects outstanding natural features and landscapes including those within the Port Hills from inappropriate subdivision, use and development;

5. protects and enhances indigenous biodiversity and public space;
6. maintains or improves the quantity and quality of water in groundwater aquifers and surface waterbodies, and quality of ambient air;
7. maintains the character and amenity of rural areas and settlements;
8. protects people from unacceptable risk from natural hazards and the effects of sea-level rise;
9. integrates strategic and other infrastructure and services with land use development;
10. achieves development that does not adversely affect the efficient operation, use, development, appropriate upgrade, and future planning of strategic infrastructure and freight hubs;
11. optimises use of existing infrastructure; and
12. N/A

e) The proposed rezoning achieves policies relating to:
- Sustainability;
- Integration of transport infrastructure and land use;
- Urban design; and
- Biodiversity, natural hazards, landscape, soils, contaminated land.

104. In terms of the CRPS polices for rural residential developments (Policy 6.3.9) the proposal sits square with all policy matters other than being a location identified in an adopted Rural Residential Strategy; and being at a higher density than provided for under this policy (ie greater than 1-2 hh/ha). As such it has a majority of features entirely consistent with the policy.
105. The CRPS includes housing capacity targets as below

6.2.1a Targets for sufficient, feasible development capacity for housing [inserted in accordance with sections 55(2) and 55(A) of the Resource Management Act 1991, from the National Policy Statement on Urban Development Capacity 2016]
For the period 2018-2048, sufficient, feasible development capacity for housing is enabled in Greater Christchurch in accordance with Table 6.1.
Table 6.1 Targets for housing development capacity in Greater Christchurch, 2018-2048

106. These derive from Our Space, under the requirements of the then NPS-Urban Development Capacity 2016, since replaced by the NPS-UD 2020. The targets (known as bottomlines in the NPS-UD) are to be treated as 'minimums' not 'maximums'.
Policy 6.3.12
enables urban development in the Rangiora and Kaiapoi FDAs (new Development Areas in the PWDP) where needed to meet the medium term targets. This a 'minimum' allocation approach contrary to the NPS-UD. The NPS-UD favours over allocation, including in locations unanticipated by RMA plans, where it will add additional development capacity, can be integrated with infrastructure planning and funding, and will contribute to well functioning urban environments – as is the case the proposed Lehmans LLR D2 zone.
107. The proposed Lehmans LLR D2 zone is consistent with the CRPS except with respect to those parts of the CRPS which are out of step with and do not give effect to the higher order plan, the NPS-UD.

Proposed Waimakariri District Plan
108. An assessment of this proposal against the relevant PWDP Objectives and Policies for urban growth and development as notified on 17 September 2021 is set out in **Appendix 2.**
109. That assessment shows that the proposed rezoning is entirely consistent with the relevant objectives and policies, including as sought to be amended by this submission. Those amendments are to UFD-P3 Identification/location and extension of Large Lot Residential Zone areas; and LLRZ-O1 and LLRZ- P1-5 and reflect the intent and outcomes intended for the proposed LLRZ D2 zone, which is a higher density LLRZ zone than the PWDP LLRZ zone (renamed LLRZ D1 in this submission).

ASSESSMENT AGAINST OTHER PLANNING DOCUMENTS
Our Space 2018-2048 Greater Christchurch Settlement Update (2019)
110. Our Space is a non-statutory document prepared under the Local Government Act. It
"responds to the new Government Policy Statement on Land Transport, which has increased funding for mass public transit schemes, and meets the requirement of the National Policy Statement on Urban Development Capacity (NPS-UDC) 2016 to prepare a
future development strategy…. Specifically, it:
• sets out how targets for housing for the next 30 years will be met, accommodating an additional 150,000 people;
• identifies locations for housing growth, encouraging Central City and suburban centre living while providing for township growth in Rolleston, Rangiora and Kaiapoi;…

• *promotes a compact urban form, which provides for efficient transport and locates development in a manner that takes into account climate change and sea level rise.[4].*

..Underpinning this settlement pattern approach is the vision for a transformation of the transport network that fosters much greater public and active transport usage, and reduced reliance on the private vehicle.

111. Our Space acknowledges that this will require commitment from the Government to invest in the necessary improvements to our transport system, which could include investing in rapid transit services. To date, there has been no successful business case for improved public transportation, including not as a Covid 19 fast track infrastructure project.

112. The Our Space housing capacity targets (Table 3) and Future Development Areas are related to growth of urban areas.

113. Our Space, like the CRPS (and the Operative District Plan) are now out of date, as they do not reflect or give effect to the new requirements of the NPS-UD.

Waimakariri 2048 District Development Strategy (WDDS)

114. The preferred growth directions for Rangiora in the WDDS 2048 (2018) are outlined above (under 'Site') i.e. westwards to Lehmans Road, and otherwise eastwards. However, the Council in its decision on the RRS, recognized west of Lehmmans Road as a potential longer town urban growth area.

115. The WDDS Rangiora Snapshot (pp38-39) -when looking ahead to 2048 proposed that:

a) Rangiora remains the District's largest town
b) 30,000 – estimated population (2048)
c) 12,025 – estimated households
d) 5,025 - new households in Rangiora
e) Continues to accommodate one third of the District's residential growth
f) 167 – estimated annual building consents for new dwellings for the next 30 years
g) 423 hectares of additional feasible residential land required by 2048 (this includes capacity in remaining stages of existing residential developments as well as new greenfield areas inside and outside of the Infrastructure Boundary)
h) Future residential growth directions proposed to the east (predominantly) and west of the current town
i) Opportunities for intensification/regeneration to be identified
j) New growth directions take into account areas of unacceptable natural hazard risk and areas of significant environmental and cultural values
k) New growth areas to connect into existing sewer and water networks
l) Stormwater Levels of Service designed to meet increased performance requirements

116. At the 2018 Census Rangiora had a population of 17,841, and 7314 total dwellings (incl those unoccupied and under construction). Population projections for the District show an average annual change 2018-2020 of 1700 persons. If Rangiora continues to attract a third of all district growth as stated in the WDSS then Rangiora's population in 2021 will be around 18,900.

Mahaanui Iwi Management Plan

117. Part 1 of the PWDP in a section "Mana Whenua" sets out the position with respect to iwi and the review of the district Plan:

a) The District's territorial area sits within the takiwā (territory) of Ngāi Tūāhuriri which is one of eighteen Ngāi Tahu regional papatipu rūnanga, constituted under the ***Te Rūnanga o Ngāi Tahu Act 1996*** *to represent* ***mana whenua*** *interests.*

b) The preparation and change of a district plan must take into account relevant iwi documents. For the District, Ngāi Tahu has set out its resource management values, issues, objectives and policies within the Mahaanui Iwi Management Plan (2013).

c) The Mahaanui Iwi Management Plan identifies objectives, issues and policies for natural resource and environmental management for six pāpatipu rūnanga (including Te Ngāi Tūāhuriri Rūnanga). It seeks to ensure that the taonga and resources of Ngāi

Tahu mana whenua are recognised and protected in the decision-making of statutory agencies. The Mahaanui Iwi Management Plan contains a comprehensive suite of policies and objectives addressing the range of resource management matters of significance to tangata whenua. The District Council shall have regard to the Mahaanui Iwi Management Plan when preparing or changing the District Plan, to the extent its content has a bearing on resource management issues of the District.

118. The Mahaanui Iwi Management Plan (MIMP) 2013 was released on 1 March 2013.

119. The MIMP is a tool for tangata whenua to express their identity as manawhenua and their objectives as kaitiaki, to protect their taonga and resources, and their relationships with these. The MIMP seeks to ensure that these taonga and resources are recognised and protected in the decision-making of agencies with statutory responsibilities to tangata whenua. Importantly it is also a tool

that assists Papatipu Rūnanga representatives to articulate their values, issues and policy into statutory processes.
120. The MIMP includes both general objectives and policies about the management of land, air, and water, and also includes catchment specific objectives and policies.
121. Section 5.3 Wai Maori (pp77-98) contains an extensive discussion about tangata whenua rights and interests in freshwater. It provides a suite of Issues, Objectives and Policies for freshwater
122. Section 5.4 Papatuanuku (pp101-124) sets out the Ngai Tahu Subdivision and Development Guidelines that are to be read along-side objectives relating to:

a) Land use planning and management in the takiwā reflects the principle of Ki Uta Ki Tai. (from the mountains to the sea)

b) Rural and urban land use occurs in a manner that is consistent with land capability, the assimilative capacity of catchments and the limits and availability of water resources.

c) Inappropriate land use practices that have a significant and unacceptable effect on water quality and quantity are discontinued.

d) Ngāi Tahu has a prominent and influential role in urban planning and development.

e) Subdivision and development activities implement low impact, innovative and sustainable solutions to water, stormwater, waste and energy issues.

123. Section 5.5 Tane (pp127-137) includes objectives that focus on:

a) Regional policy, planning and decision making in the takiwā reflects the particular interest of Ngāi Tahu in indigenous biodiversity protection, and the importance of mahinga kai to Ngāi Tahu culture and traditions.

b) The customary right of Ngāi Tahu to engage in mahinga kai activity is recognised, protected and enhanced…

c) Customary use, and therefore mahinga kai, is given effect to as a first order priority for freshwater management in the takiwā.

124. Section 6.4 (pp213-224) addresses issues of particular significance to the lands and waters of the Waimakariri catchment within which the Site lies.
125. Relevant Objectives relating to urban development of land in that catchment include:

a) The natural “energy, vitality and life” of the Waimakariri River as a braided river is protected and restored.

b) The discharge of contaminants to the Waimakariri and its tributaries is eliminated.

c) Water quality and flows in the Waimakariri and its tributaries are improved to enable whānau and the wider community to have places they can go to swim and fish.

d) The mauri and mahinga kai values of the Waimakariri and its tributaries and associated springs, wetlands and lagoons are protected and restored; mō tātou, ā, mō kā uri ā muri ake nei.

126. A key issue relating to subdivision and development is that subdivision and development activities in the lower catchment have the potential to adversely affect Ngāi Tahu values such as waterways, mahinga kai and sites of significance (Issue Wai4).
127. The proposal provides for full urban reticulation of the three waters and is consistent with the objectives and policies contained in Chapters 5.3 and 5.4 of the MIMP. The proposal does not preclude individual land owners from installing rainwater collection and use from roof areas at the time of building development.
128. The proposal has been designed taking into consideration the potential effect of resultant subdivision and development on the rivers and streams that flow into the lowland rivers.
129. Overall it is considered that the proposal will not have adverse impact on the cultural values of iwi as set out within the MIMP.

SECTION 32 ASSESSMENT

130. A Section 32 assessment is contained in **Appendix 3.**
131. In summary, the PWDP zoning and associated rules (RLZ Zone with a minimum lot size for subdivision and a dwelling 4ha) do not meet the needs and aspirations of the current owners.
132. Strategic Council planning documents (specifically the WDDS) have a focus on only meeting urban growth demands within urban environments of existing towns. They favour intensification (15hh/ha) and a strict allocation of capacity by development areas. It is a control and command regime consistent with Map A of Chapter 6 of the CRPS but is out of step with the requirements of the NPS-UD which requires a more flexible, responsive approach, prohibits a hard fixed unmoveable urban/rural boundary.
133. This approach leaves little room for new proposals or proposals that do not sit square with the standard array of GRZ/medium density or SETZ (Settlement Zone). SETZ applies to some of the District’s smaller settlements outside Greater Christchurch.
134. Neither LRZ nor Large Lot Residential (LLRZ) as notified in the PWDP is an efficient use of this block of land located as it is immediately adjoining the urban area of Rangiora, and in a location easily accessible to the town centre by active transport modes as well as car and several district reserves.
135. If this Site is not zoned for LLRZ D2 (minimum average lot size 1500m^2) use to enable residential re-development then it will drive pressure to re-zone elsewhere. That step potentially will not have the significant benefits to Rangiora long term in relation to enabling a well-functioning urban environment that enables people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future. Additionally re-zoning to LLRZ D2 will contribute to providing additional development capacity to meet the different needs of people and communities in a planned manner and

consistent with the NPS-UD.
136. The Site can readily be developed to reflect the principles of the Urban Design Protocol with values of character, context, and connectivity.
137. The Section 32 assessment concludes that the proposal to re-zone the Site from LRZ zone to LLRZ D2 Zone (average lot size 1500m2) is the most appropriate method for achieving the objectives of the proposal, than the other alternatives considered.
138. Option 2 identified in the s 32 assessment is consistent with some PWDP policies notwithstanding that it does sit square with the strategic intentions signaled in the WDDS and the PWDP approach to providing for development capacity and urban development.
139. Option 2 identified in the s 32 assessment to re-zone the Site is the most appropriate given:

a) The proposals adopt the PWDP zones, development and activity standards with appropriate amendments. This ensures continuity of the District Plan anticipated environmental outcomes and urban amenity for Rangiora and adjoining residential areas;

b) Will be consistent with and give effect to many of the relevant PWDP objectives and policies;

c) It is a logical extension to the developed and developing residential land adjoining the Site while achieving a compact, efficient urban form that removes pressure on isolated rural land elsewhere around Rangiora.

d) It gives effect to the NPS-UD, specifically Objective 6 c) and Policy 8, delivering significant additional development capacity and contributing to a well functioning urban environment.

e) It is assumed that there will be capacity in the public utilities and the existing road network, including planned upgrades, to accommodate the traffic effects of the redevelopment;

f) The proposed Site specific ODP will provide certainty of the final form and disposition of the re-zoned area including its proposals for reserves, roading, future linkages for pedestrian and vehicular traffic.

140. The re-zoning proposal is considered to be appropriate to achieve the sustainable growth and development of Rangiora.
141. The economic, social and environmental benefits of the proposed rezoning outweigh any potential costs.
142. The overall efficiency and effectiveness of the proposed rezoning (Option 2) is high, in comparison to the alternative options set out in the s 32 Assessment which are low (Options One and Four) or low to moderate (Option Three).
143. The PWDP proposes to release land for development in the new Development Areas at Rangiora and Kaiaipoi through a novel and untested certification process that is not clearly derived from RMA statutory powers, nor Local Government Act 2002 (LGA) authority. This approach is not proposed for the LLR Overlay areas. As the proposed Lehmans Road LLR D2 zone proposed by this submission seeks large lot urban densities, it is anticipated that Council may favour the certification process if it accepts the proposed rezoning. This is opposed – rezoning to LLRZ D2 is sought.
144. Potential difficulties with the proposed certification process are identified and discussed in the Section 32 Assessment. (**Appendix 3)**. In summary, the process is hugely discretionary, does not provide conventional rights to an applicant (eg right of objection/appeal) meaning decisions cannot be challenged, and it is not apparent that the process will be appropriately documented with a transparent record of the decision-making within the certification process. Further uncertainty arises in the practicalities of how to negotiate and manage the staging, funding and building of key infrastructure across a range of Sites, and a risk that land supply is controlled by a limited number of large developers. It is a far less efficient and effective method for delivering land for housing than the Council rezoning the land in the PWDP.
145. The proposed rezoning is considered to be the most appropriate, efficient and effective means of achieving the purpose of the RMA.

CONSULTATION

146. The landowners and their consultants have submitted on the WRRS and the WDDS (**Appendix 4)**.
147. The submissions to re-zone as rural residential or identify the Site as suitable for LLRZ have been rejected as noted above. LLRZ but at higher densities as now proposed is considered to be a more efficient use of the land and better meets market demand. 5000m2 sites provide more land is needed for a spacious home and garden.
148. The landowners have been consistent in their wish to find a zone and possible land uses better suited to their needs.

CONCLUSION

173 The submission seeks to rezone 58 ha of land adjoining Rangiora from Lifestyle Rural Zone (LRZ) to Large Lot Residential with a specific density standard (LLRZ D1), minimum average lot size 1500m^2.
149. The Site has a long history of rural lifestyle use. It is not significantly restricted by potential natural hazards especially flooding, nor does it have physical limitations for development for residential purposes as it is not liquefaction prone, and has no known geotechnical limitations but does contain an area of LUC 2 soils. It is near a site of significance to iwi (SASM – 025) being the Rakahuri/Ashley River The Site has access to a collector road and is near to a strategic road giving direct access to the town centre and a range of community amenities and facilities.
150. The Site immediately adjoins the urban area of Rangiora, and is well located to join in to Council utility services. It is well suited for conversion to residential use.
151. The Site is not identified within the westward growth direction for Rangiora in the District Development Strategy 2018 nor is

it part of the DEV-WR development area which adopts Lehmans Road as its western boundary. It is in a location that achieves coherent and compact urban form offering ease of access to business services, community facilities, reserves and the primary road network.
152. The proposed rezoning provides for a connected and high amenity residential living environment not presently available under the PWDP while avoiding and/or mitigating any potential adverse effects on the environment. It will provide for continuing high demand for a variety of high quality residential sections aimed at a particular segment of the housing market in an ideal location, easily accessible to the existing town centre services and facilities. It will broaden the range of housing available. As such, it is consistent with the NPS-UD including Objective 6c) and Policy 8, to be responsive to proposals which supply significant development capacity and contribute to a well functioning urban environment.
153. The use of this Site for residential purposes can be a sustainable and efficient use of land and infrastructure. The proposed rezoning better provides for the social, economic, environmental well-being of the landowners and the Rangiora community than continuation of the current low intensity lifestyle land use on 4ha blocks, or a conventional LLRZ residential use.
154. Any potential adverse effects of the implementation of the proposed rezoning can be assessed at subdivision stage but there has been no restriction on servicing the blocks to date. Capacity will need to be confirmed for infrastructure, power and road network. Any future subdivision of the Site will need to confirm water supply and wastewater treatment and disposal options.
155. Rezoning of the site to LLRZ zone is not inconsistent with the policies and objectives of the PWDP, but it is at odds with the dated CRPS approach to provision of urban growth and housing capacity for Greater Christchurch, to the extent that it is not within an FDA created by Change 1 to the CRPS and is not identified as an LLRZ site under the strategic RRS prepared by the Council.
156. As the proposal helps achieve the purpose of the RMA, and has been shown to be consistent with the relevant provisions of the NPS-UD, the submission can be accepted by Waimakariri District Council.

Original Submission

Summary Reasons for the Submission

The reasons for our submission are outlined below.
a) The preferred relief (**the proposed rezoning**) is both appropriate and necessary to achieve sustainable growth and development of Rangiora and the District and meet the requirements of the National Policy Statement for Urban Development 2020 (**NPS-UD**).
b) The Site identified in Figure 1 and at para 1 of the Preferred Relief above is a logical and preferred location that lends itself to a specific type of housing development not provided within the PWDP as a residential option adjoining but outside the existing urban areas. Nowhere is it possible to develop in a comprehensive, coordinated way a low density, high quality residential environment in the District's towns, the Rural Lifestyle Zone or Settlement Zone as a permitted activity.
c) The requirement for 12/15 hh/ha in GRZ zones (the majority of land in urban areas) drives development to modern scale relatively small urban lots best produced as a package across a significant land holding. The GRZ subdivision standards do not provide for the needs of people who seek a generous sized urban lot residential setting. This is a housing sector that is running against the planning tide of intensification but is, nonetheless, a legitimate form of housing in an appropriate setting. The barriers to such development in urban areas requires an appropriate setting/ location in the rural areas but close to or adjoining the urban areas and at a much lower density than is desired or appropriate (the PWDP LLRZ) to meet the housing needs for generous sized urban lot residential living..
d) The PWDP subdivision standards for LLRZ require lots that are very large for those whose primary interest in a rural setting is a form of residential living, not one that requires significant maintenance and management often involving animals or machinery at scale. Conversely, the GRZ subdivision standards do not provide for the needs of people who seek a large lot residential setting
e) The focus in the PWDP is on prescribing a limited range of residential options and tightly controlling and constraining housing choice within those options. Further urban growth is also tightly constrained and controlled around DEV areas around Rangiora and Kaiapoi but for a very specific form of residential development driven off density requirements that do not match the needs of all landowners.
f) The focus in most new District Plans, driven in part by the National Planning standards, is to simplify the range of zones, to standardize lot sizes, to supposedly create efficiency and certainty through ease of administration of the District Plans. This is done by constraining housing and land development choices by lot size, by location, by built standards and the disposition of built/open elements in a site. However, the National Planning standards do provide for large lot urban residential living, a residential living option which has not been taken up the PWDP (due most likely to the restrictive provisions of the CRPS which only prescribe one from of lower density residential living, at a density of 1-2 hh/ha).
g) This planning approach may be a standard approach to resource allocation but it does not provide a flexible, responsive

approach to innovative and new development options. The Government is creating policy settings that on one hand seek intensification in urban areas, while at the same time pushing away from a land allocation model of planning. The PWDP in striving to face both policy directions has a package of measures that are in fact a major barrier in terms or cost, timeframes and certainties for proposals that are not cut from the suite of housing and development options set out by the PWDP. The allocation of land in preferred development areas, it must be said, runs counter to the Government's push, and now its direction, to free up land for development, to encourage innovation in housing (presently with a focus of intensification) and to make available a range of responses to the need to meet the housing needs of people and communities set out in the NPS-UD.

h) While the weight of demand (and the planning response) is around affordable housing, around small lots and dense development that supports investment in public facilities and amenities such as public and active transport, reserves, and commercial services, there is always a wide spectrum of preferences at play in the housing market. The demand for high quality, generous houses set on generous sized parcels of land within high amenity settings is an important and no less relevant housing sector. There is a strong unmet demand, as confirmed by advice from Bayleys real estate (**Appendix 5**) for larger family homes with room for a pool or similar. Purchasers want to be close the amenities of Rangiora and within walking and cycling distance of local schools. They do not want the only available options – a 4 ha lifestyle block or 5000m^2 rural residential site at Mandeville or Ohoka.

i) Interestingly enough for a nation built on the so-called quarter acre paradise, recent policy and planning interest in housing and land development has now seemingly positioned the 1011m^2 section as a luxury item, as the antithesis of providing for community well-being and needs. It is as though the old quarter acre of itself acts against building a sense of community despite being able to be developed in a planned, structured, coordinated or integrated manner. Rather than being a frivolous discretionary item in land development
and housing choice, a well-planned, well located and properly serviced low density residential environment has much to offer urban environments. They can be tactically used to provide shape and edge to urban areas, they can provide a mass of amenity different from (and potentially complementary to), but no less legitimate in urban outcome terms, to conventional GRZ zoned land.

j) In many ways the approach of a district plan to the role and place of the old quarter acre is not dissimilar to the issues faced by comprehensive retirement villages when first proposed. The idea of dense, almost gated and self-contained communities, with multi storey buildings also did not sit well in many district plans. But now they are accepted as an important part of the urban fabric catering to a specific demographic and health demographic. Most plans enable them.

k) Provision for low density residential in an urban setting, or failing that likelihood, in an adjoining rural zone is a fundamental gap in the district plan.

l) The submission seeks to provide for another housing typology not provided in the PWDP and in a location with significant planning merit. The planning case was made out in a detailed submission to the proposed Rural Residential Strategy (**RRS**) for the land identified in this submission to be "reserved" for conventional Rural Residential zoning in the review of the District Plan. That submission was rejected in favour of a decision ascribing an unspecific strategic significance to Lehmans Road as the urban boundary; simply the decision was that rural residential development here would preclude this area as a future urban growth path, even though this was likely to be very long term as the Waimakariri District Development Strategy (WDDS 2018) for the period up to 2048, does not favour urban growth west of Lehmans Road.

Officer Recommendation

Continue to exclude the area west of Lehmans Road and the racecourse land at Rangiora as growth areas as these were originally considered but not included in the draft RRDS as they trigger the key preliminary criteria of: being on the direct edges of a main town outside of the Projected Infrastructure Boundary (PIB) thereby foreclosing more intensive long-term urban development, and…

Panel Recommendation

The panel accepted the officer recommendations to exclude areas on the fringes of Rangiora in the final RRDS due to these having the potential to foreclose more intensive long-term urban development of the town.

m) In light of the above decision on the Waimakariri Rural Residential Strategy, the proposal now is for a form of high amenity low density urban zoning, which whilst in demand is entirely absent from the PWDP. This will be a long term urban form of development. The proposal set out in the submission will achieve a compact, and efficient, urban form on the edge of Rangiora with excellent connectivity by multiple transport modes. It provides for continuous urban development by enabling a built form which can act as a strong zone or urban boundary.

n) The proposed rezoning will accommodate approximately 311 LLRZ lots1 at the proposed amended density standards for LLRZ D2 (average size 1500m^2). It will contribute to a well-functioning urban environment, meeting the NPS-UD Objective 6(c).

o) Any adverse effects on the environment arising from the proposed rezoning will be minimal, if any, and can be adequately mitigated. A high amenity master planned development is proposed.

p) Significant positive effects arise from the proposed rezoning. It will enable the short term housing demand at Rangiora to be met, and can deliver a housing typology for which there is demand, on lots that are not a burden to the landowners (which is the case for 4ha and the very limited areas of LLRZ D1 with a density of 1-2 hh/ha) and for which there is no provision in the PWDP. At present rates of land uptake there is about 4 years vacant land supply in Rangiora. Given it takes 3-5 years to bring land from zoned state to on the market as developed lots, there is some urgency in providing additional capacity. This proposal helps address an anticipated shortfall in residential zoned plan enabled land.
q) There is no additional cost to the Council in re-zoning the Site as there is expected to be capacity in the public utilities and the existing road network, including planned upgrades.
r) Amendments to PWDP objectives and policies may be necessary to provide for a higher density LLRZ, but of themselves will not act against those relating to Strategic Directions Urban Form and Development and Urban Growth. The PWDP approach to zones and
identification of future development land is already out of step with higher order Resource Management Act 1991 (RMA) statutory documents because they do not give effect to the NPS-UD (and are sought to be amended through this submission).
s) The alternatives of retaining Rural Lifestyle or Large Lot Residential zone across the entire Site are not an efficient use of land which immediately adjoins the urban area of Rangiora, and is highly accessible to the town centre by active transport modes as well as car.
t) The proposed rezoning is consistent with and the most appropriate, efficient and effective means of achieving the purpose of the RMA.

The Site
1. The Site is a 58ha block of land ('the Site') accessed from Lehman Road, Rangiora **(Figure 1)**. It is owned by the two submitters and 12 other landowners.

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1 Assumes 20% of land area taken for servicing including roading, reserves and stormwater management if required.

Figure 1: The site (outlined in blue (Google Earth)

2. The Site is surrounded by RLZ land that is used for a mix of lifestyle and conventional farming. To the NE is the Rangiora Eco Holiday Park, and beyond the Park is the Rangiora Racecourse about 300m away from the nearest lot and 1km from the centre of the Site. Land to the south east is GRZ and part of urban Rangiora with newly developing residential land west of West Belt. About 1.9 km to the NW is Rangiora Airfield. About 1km north of the most northern lot is the Ashley River.
3. The southern-most lot in the proposal with the Rangiora Vet Clinic faces, but does not have access to Rangiora-Oxford Road (State Highway 72). This arterial road provides the main road connection in to the centre of the town. The well-established Fernside Rural residential area is about 2.5km west from the junction of Lehmans and Rangiora-Oxford Roads.

Figure 2: the site is a broader context (Site marked red)

4. The Site is not identified as lying within a preferred growth direction for Rangiora in the Waimakariri 2048 District Development Strategy (2018) (**WDDS**) **(Figure 3)**. No land west of Lehmans Road is included in the West Rangiora Development Area (**DEV-WR**) in the PWDP.

Figure 3: Figure 11 WDDS

5. The Council reviewed its strategic approach to the location and provision of Rural Residential land (now zoned LLRZ in the PWDP) in the WDSS. It adopted the position that it would:

a) Explore tools such as cluster development to manage rural character

b) For rural residential development, adopt an approach that has a primary focus on creating new rural residential areas, with a secondary focus on enabling large lot intensification within existing rural residential areas where there is sufficient community support and servicing available

c) Review the Rural Residential Development Plan for the whole District (pg 21 WDDS).

6. Rangiora presently has a population of 17,841 (2018 Census). It grew steadily between 2006 and 2018. Growth of Rangiora since then has continued in step with the district growth which has increased 8.2% between 2018 and 2021 from 61,300 to 66,300 at an annual average of 2.8% from 2018 to 2020 (Statistics NZ Subnational population projections at 30 June 2021: provisional).

2006 (count)	2013 (count)	2018 (count)
12,165	15,069	17,841

Statistics NZ

Population projections at 30 June

PLANNING STATUS OF THE SITE

Chapter 6 of the Canterbury Regional Policy Statement

7. An assessment of the CRPS is set out in **Appendix 1** to this submission.
8. The Site is within the Greater Christchurch area.
9. It was not shown as a Greenfield Priority Area – Residential (GPA) on Map A of the Canterbury Regional Policy Statement (CRPS). The GPA terminates at Lehmans Road.
10. As a result of the Minister for the Environment's decision of 28 May 2021 on Change 1 to Chapter 6, an area largely south of Oxford Road and a finger of land to the north of Oxford Road was included as a Future Development Area (**FDA**) (**Figure 4** orange).

Figure 4: Map A Chapter 6 Regional Policy Statement Greenfield Priority areas
Site location identified with red circle (appx)

11. The FDAs are intended to accommodate the increased demand for new dwellings in that part of Waimakariri District within the Greater Christchurch Urban Area and to respond to the NPS-UD. They do not provide "plan enabled" land as they need to negotiate a rezoning process to confirm their status as land developable for housing and other urban purposes.
12. The proposal for a LLRZ zone with average lot sizes of 1500m2 is inconsistent with the policy approach of Chapter 6 for Greater Christchurch, in that if fits none of the residential living typologies provided for in Chapter 6 and is not in a location identified for urban or rural residential development. It sits 'between' the urban and rural residential densities provided for in the CRPS (minimum 10 hh/ha for urban in Waimakariri, and average 1-2 hh/ha for rural residential). The proposed density is appx. 6.66 hh/ha.
13. Notwithstanding, the proposal meets all the location and other criteria in CRPS Policy 6.3.9 for rural residential development. It is:

- Outside the CIAL noise contours
- Has some sites with restrictions from the take-off and landing vectors for Rangiora Airfield but not such as to impact its operational capacity.
- Is outside the groundwater protection zone
- Is not within the Waimakariri stop bank system
- Has no views of or to the Port Hills
- Has good access for emergency services
- Will not create reverse sensitivity issues with adjoining land uses; Rangiora Racecourse is 500m away.
- Free of significant natural hazards and is a flat site.
- Supports no significant natural values or ecological values.

• Contains no SASMs.
• Can be integrated into or consolidated with the existing urban area of west Rangiora.
• Contains no surface water bodies so there will be no adverse impacts on these.
• The development will be contingent on an ODP to provide integrated design for subdivision and land use, and provide for the long-term maintenance of a high quality high density rural residential character.
• The proposal is not intended as a staged development towards full urban; rather it is intended to provide a unique residential environment that can stand alone and contribute to the urban fabric of Rangiora like Palmview in east Rangiora, or as Kaiapoi Lakes does for Kaiapoi.

14. Overall, the proposal is not consistent with Chapter 6 but that is more a function of its original purpose when formulated in 2013. Notwithstanding that, the submission for a lower density residential focussed, high quality urban environment that attaches to an existing urban area and that promotes a coordinated pattern of development has planning merit.

Operative Waimakariri District Plan

15. The Site is zoned Rural in the Operative Plan. The minimum lot size for subdivision and a dwelling is 4 ha.

Proposed Waimakariri District Plan

16. The Site is zoned Rural Lifestyle Zone **(LRZ) (Figure 4).** The minimum lot size for subdivision and a dwelling in the LRZ is 4 ha.
17. Oxford Road is a strategic road and Lehmans Road is a collector road.

Figure 5: Proposed District Plan Zoning (site outlined in red)

18. The Site is also subject to, or potentially influenced by, a number of Overlays:
a) Rangiora Airfield Take Off Climb and Approach Obstacle Limitation Surface (**Figure 6**)
b) National Grid Transmission Lines (**Figure 6**)
c) Liquefaction: Liquefaction damage is unlikely (**Figure 6**)
d) Non-Urban Flood Assessment Area (**Figure 7**)
e) Geographic areas: Ecological Area – Plains
f) Ecological District – Low Plains

Figure 6: Rangiora Airfield Take-off and Approach vectors (blue dashed lines); Liquefaction damage unlikely (green)Transmission lines (green lines); Site outlined in red

Figure 7: Non-urban flood assessment & Waimakariri Flood Hazard maps
Blue – medium risk, green – low risk, white – very low

DEVELOPMENT PROPOSAL AND PROPOSED REZONING

19. Subdivision of the Site will create approximately 311 LLRZ D2 lots.
20. The key design drivers for the proposal are:
a) A high amenity premier residential zone with large houses on large sites – average 1500m^2, min 1000m$_2$ based on the St Kilda, Hamilton development concept (**Figure 8**).
b) LLRZ D2 standards would enable a lower density zone in the medium term e.g. 10 years to achieve a high quality consistent character subdivision. If developed as an integrated development subject to an ODP subdivision can be staged for to the proposal.
c) Creating strong connections with the immediate neighbourhood by providing a cohesive interconnected roading layout that picks up direct links to the eastern neighbourhood off Lehmans Road and the northern subdivision roading, and carries them into the Site.
d) Creating a high amenity and diverse residential neighbourhood by providing interfaces to roads, reserves and rural environments.
e) Respecting and building on local identity and character of Rangiora by retaining specific vegetation features from the Site, and anchoring the development into the wider landscape.

21. A development concept can provide for sound urban design by:
a) A hierarchy of movement corridors.
b) Prioritisation of walking and cycling.
c) A north-south alignment of street blocks to maximize solar access and provide for efficient use of lots.

d) Block perimeters being kept as small as practicable to aid permeability and higher public amenity.
e) Enabling a range of housing typologies set in high quality landscape and street setting with generous amenity plantings and curtilage.

Figure 8: St Kilda development images (Bayleys)

22. St Kilda, Cambridge is a premier development on the outskirts of Cambridge, centrally located and with easy access to the Waikato Expressway. It was originally part of a small dairy operation which was dissected by the Waikato Expressway, leaving a portion within the Cambridge Town boundary and the larger balance of the property of approximately 80 ha (which became St Kilda) on the Eastern side of the Expressway, left in the Rural Zone.
23. The initial development concepts were for a Rural Residential type development given the Expressway separation of the existing residential development on the Western side of the Cambridge Bypass, however this was not supported by Council and a new concept of larger residential sections of a 1600m² average size was developed and approved – see https://www.stkilda.nz/page/location/

EFFECTS ON THE ENVIRONMENT

Township growth and urban form

24. The Site immediately adjoins the western edge of urban Rangiora.
25. The WDDS indicated a general preference for the direction of urban growth of Rangiora to the east as a way of balancing up the residential areas around the town centre and some growth to the west.
26. The approach of the WDDS was to signal growth options to be confirmed in the District Plan Review:
The broad directions for greenfield residential growth for the District's main towns are set out in Figures 11 to 14. Further work will be carried out to identify and confirm the exact locations and extent of these residential growth areas, together with the intensification opportunities within existing urban areas. These will be enabled through the District Plan Review and other planning tools.
27. The Strategic Planning documents clearly signal active consideration of growth needs and growth directions. The options available to the Council were constrained by the approach of the CRPS as the District Plan has to give effect to the CRPS and cannot be
inconsistent with it. The CRPS took effect in 2013 and is overdue for review.
28. The CRPS tightly holds urban growth to the constraints of Map A Chapter 6 and the identified FDAs which although amended by Plan Change 1 in 2020 does not respond to the directions of the NPS-UD. In any event the approach is focused on the need for housing in full urban residential land, less on other residential development forms.
29. As such the Site falls outside the planning policy framework for urban growth. However, in terms of urban form and on the ground, there is considerable merit and logic to conversion of this existing LRZ land to a new high amenity residential form that can be integrated into the Rangiora urban fabric.
30. The proposal has the potential to anticipate the longer term growth path confirmed by the decisions on the RRS to protect the future growth option of more intensive urban development in this direction. It can set a pathway to further westward expansion on land
that holds few if any physical barriers to land development.
31. The proposal will contribute to the housing needs of Rangiora and in a form and location that does not undermine the long run urban form of Rangiora. Planned growth confirmed in the PWDP is already intended to extend westwards out to Lehmans Road and to keep the town edge squared up providing depth to future development and providing a rational basis for providing movement networks driven off the key roads such as Rangiora-Oxford Roads. The West Rangiora Future Development Area confirms this approach. The Site sits in the next block west of Lehmans Road so is not proposing a disjointed urban form, nor one that is not part of the long term thinking of urban form and growth for Rangiora.

32. A full residential zoning is proposed under LLRZ D2 and will provide a high quality street character, overall amenity and passive surveillance over the street, and will create the correct lighting standards, roading standard, fully formed footpaths and cycleways required for a high quality urban environment.

Neighbourhood and wider community effects

33. The Site is serviced by a collector road and is close to an arterial road. This provides for ease of access and safe and convenient movement to and from the Site. A planned development co-ordinated by an ODP can facilitate within the site

movement corridors and linkages through the Site to provide for walking and cycling.
34. A key positive neighbourhood and community effect will arise from the existing dwellings and their established gardens and plantings that will anchor new development and provide a point of reference for new dwellings. Development will not be on a bare site; it will take place in an existing established part-residential setting. The transition to a low density, high quality premier residential development will start from a favourable position and minimise the apparent extent and nature of the landscape change.
35. The Site is comparatively large (58.4 ha) and has the potential to support a variety of residential building typologies and this will contribute to a mix of households within the development and provide built form variety and interest in the streetscape. Whilst LLR D2 standards are proposed, it may be that part of the Site is suitable for other higher density forms of development, which would be within scope of the alternative relief, and could be considered as part of the master planning process required for preparation of an ODP (ahead of the hearing). The earlier stages of the St Kilda development were for large lot residential, with more clusters of townhouses included as later stages (and a retirement village). A retirement village is unlikely in this case, given the proximity of the Charles Upham Retirement Village.
36. Rangiora is well-positioned to accommodate and service the needs of a fast-growing resident population that will in turn support more business activity, schools, community facilities and community organisations.

Effects on tangata whenua values
37. The Proposed District Plan does not identify any Sites and Areas of Significance to Maori in the Site, but the nearby Rakahuri/Ashely River identified as SASM-025. This has been scheduled as being
River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species
38. The PWDP has Policy SASM-P8 which is relevant to pre-development processes:
Engagement with rūnanga
Te Ngāi Tūāhuriri Rūnanga and the District Council to encourage engagement with the Rūnanga priorto persons undertaking activities and/or applying for resource consent where the activity has thepotential to adversely affect identified sites or areas of Ngāi Tūāhuriri cultural significance. Where priorengagement with Te Ngāi Tūāhuriri Rūnanga h as not been undertaken by an applicant for an activitythat has the potential to adversely affect an identified site, the District Council will consult with the Rūnanga.
39. The Site is not listed as an archaeological site on the NZ Archaeological Site database.

Landscape and visual effects
40. Rural Lifestyle style development exists on the Site now (a series of 4 ha lots with a dwelling and associated accessory buildings on each). The landscape is dominated by shelter belts, utility buildings, significant trees and planted curtilages around dwellings many of which are well set back off the roads down RoWs.
41. An ODP will help to achieve an integrated, cohesive and coherent development The proposal will lead to a modification of the landscape of the Site from a predominantly lifestyle block landscape to a denser semi-urban environment dominated by residential building that will, in time, get the benefit of street tree and reserve plantings and landscape treatments around the houses.
42. The visual effects which will arise from a change in the number of vegetative and built elements in the landscape are significant, but not avoidable, if the Site is to contribute to the on-going growth of Rangiora. The change will contribute to a high quality amenity and quality of environment and one that will be entirely consistent with and supportive of the rural lifestyle residential development that has successfully established on the Site.

Well-functioning urban environments
43. The Site adjoins the existing built up urban area of Rangiora. Immediately to the east are existing or developing residential areas.
44. The conversion of the Site from present rural lifestyle uses to low density, high quality residential will continue a pattern of outward expansion of Rangiora. Such a change may not be consistent with the PWDP's identification of a Future Development Overlay for west Rangiora only as far west as Lehmans Road, but on the ground it will look and integrate as part of the urban fabric.
45. It will provide some replacement lower density living areas for the existing LLR zones at north west Rangiora – but at much more appropriate higher density that the LLR D1 standard which is 1-2 hh/ha. There are two such areas, shown on the planning maps below. River Road has an 'urban overlay' and is intended to be intensified to urban densities. The land on the opposite (east) side of Lehmans Road is a 'legacy' rural residential zoning which applies under the Operative District Plan. The landowners have developed the adjoining residential subdivision and wish to develop the land for full urban residential development. Services are in place to support this. The constraint to date has been Map A of the CRPS which does not include the land as a Greenfield Priority Area or Future Development Area, GR zoning of this land is consistent with the NPS-UD.

Figure 9: PWDP as notified – LLRZs shown in light grey. Diagonal stripes – urban growth overlay.
Site outlined in red.

46. Rangiora is growing apace. It is attracting significant interest from new home buyers as people respond to the significant investment in upgraded transport links (Northern Corridor and public transport) and a growing economic base for employment within the District and the City.

47. Rangiora has excellent connectivity to the City, both via the new Northern Corridor, and a nascent cycleway link into the City. There is a very regular bus service every half hour.(the No 1 Blue Line) The standard trip takes 70 minutes, and there is a twice daily weekday morning express service from Rangiora, and seven times weekday express out to Rangiora all via Kaiapoi.

48. The Site will step out the western edge of Rangiora, but as it exists in a peri-urban form now, such a change does not alter how the Site interacts with Rangiora as a whole. It is in many ways a functional part of urban Rangiora now; it's only the Zone boundaries and policy framework that create the sense of it not being part of Rangiora.

49. The Site is convenient to the Rakihura/ Ashley recreation trails, the racecourse, Arlington Park, and the airfield. The town centre is easily accessible.

50. The following assessment of the criteria in the NPS-UD for determining a well-functioning urban environment shows that the proposed rezoning will deliver urban, housing and residential outcomes that meet those criteria. There will be a variety of homes enabled by generous lot sizes. The Site is well-positioned, building as it does on an existing township well-serviced by public transport and cycling options, to provide good accessibility to jobs, community services, and open spaces, as well as mitigating climate change impacts and future natural hazards by being not near the coast and well removed from major rivers.

NPS-UD Policy 1

Planning decisions contribute to well functioning urban environments, which are urban environments that, as a minimum:	**Assessment**
(a) have or enable a variety of homes that: (i) meet the needs, in terms of type, price, and location, of different households; and (ii) enable Māori to express their cultural traditions and norms;	The proposal is to have larger lots supporting predominantly standalone dwellings and associated accessory buildings (including generous sized garaging) in an open landscaped garden setting. This will fill a gap in the range of housing typologies available at Rangiora and contribute to a better functioning urban environment overall at Rangiora. It is not necessary for each individual rezoning proposal to have a wide range of housing typologies, and in some circumstances this may not be appropriate. The rezoning will deliver a premier high amenity urban subdivision with generous sized lots which will complement existing and planned higher density residential development at west Rangiora. There is scope with the relief sought for a mix of residential densities. The appropriateness of this can be considered at the master planning/ODP stage. The Site has the potential to create a unique urban environment in Rangiora. It can follow the example of Palmview based on a lake or Kaiapoi Likes providing a niche housing option in Rangiora and the District meeting a need for residential land not constrained to GRZ standards.
(b) N/A business sectors	
(c) have good accessibility for all people between housing, jobs, community services,	The Site has access to a collector road and a strategic road providing easy access to key community amenities and facilities. The town is served by a public bus route to the city, and a cycle trail connecting to Kaiapoi and the City. The new West Rangiora Development Area adjoins the Site to the south. The Site will become closer to Rangiora public transport routes as they extend out to service this new growth area over time.

natural spaces, and open spaces, including by way of public or active transport; and	The Site is in walking distance to Arlington Park and the Rakahuri/Ashley which contains abundant recreations pace. It is easily accessible to the town centre and within walking distance to the Huntingdon Drive local centre.
(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and	The demand for housing and land in Rangiora is largely ahead of the planning means to respond. This proposal will "top up" the land presently set aside in the PWDP and provide a useful buffer to demand. The Site owners have been keen to release this land for more intense development for some time; there is no prospect of land banking.
(e) support reductions in greenhouse gas emissions; and	The Site has significant advantages in being easily accessible to the town centre and reserves, community facilities and schools. The proposal retains a consolidated form to Rangiora with good connectivity and linkages to recreation space and commercial centres reducing the need for car travel.
(f) are resilient to the likely current and future effects of climate change	The Site is within the area of influence of a major river but the non-urban flood assessment maps do not show extensive flooding likely at the Site. Being inland it is not at risk from climate change induced extreme natural hazard events like sea level rise. or river flooding.

Effects on ecosystems and habitats

51. The Site is currently used for a mix of low intensity (grazing) farming, and lifestyle purposes. Shelter belts and utility buildings have been established
52. The Site has been identified in the PWDP with two ecological overlays (the PWDP ecological overlay – Plains and Low Plains Ecological District). They are a district-wide overlays and no specific ecological values have been identified in the Proposed Waimakariri District Plan. These overlays seek primarily to retain indigenous vegetation. The PWDP identifies SASM 025 nearby the Site. That is a Site and Area of Significance to Maori and in SASM - Schedule 1 is identified as *being River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species.*

Effects on natural and physical resources

53. The Site drains in a SE direction towards the newly developing residential area.
54. There will be a degree of site disturbance as part of creating the roading network, and reserves, and as part of curtilage development on each lot.
55. The proposed use for residential activity inevitably leads to loss of some rural productive potential as land owner intentions are not about farming or productive use of the land, but lifestyle use and enjoyment. Built forms and hard surfaces become more dominant.
56. The Site comprises 4ha bocks now and these are not able to be used effectively for productive purposes other than for intensive productions based on tunnel housing and other supported production systems. None exist in the Site now.
57. The Site contains Class 2 and Class 3 soils as defined in the NZ Land Use Inventory (Landcare Research) Land Use Capability classes 1-3 **(Figure 10)**. Productive use of these soils other than for low level purposes i.e. grazing, is not feasible given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production).

Figure 10: Site soils: Site outlined in red; (Canterbury Maps)
Class 2 soils: bright green/Class 3 soils: light green;

Discharges of contaminants into the environment
58. There will be no discharges of contaminants into the environment. Wastewater will discharge to the Council's reticulated system.
59. Stormwater discharges will potentially be to ground given ground conditions or to an approved and consented stormwater management and treatment area which will meet all relevant Council standards.

Risks from natural hazards or hazardous installations
60. The PWDP planning maps show the Site as being within a Non-Urban Flood Assessment Area.
61. The District Plan maps do not identify high flood hazard areas or high coastal flood hazard areas, rather these are identified through the flood assessment certification process. This enables the most up-to-date technical information to be used. However, as a guide, areas that are potentially high hazard can be identified through the Waimakariri District Natural Hazards Interactive Viewer (NH - Introduction).
62. Rules that refer to a Flood Assessment Certificate require a certificate to be obtained from the District Council to determine compliance with the relevant rule. The alternative is to apply for resource consent as set out in the rule.

63. Rule NH-R2 states
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;

64. Assessment of flood risk and consequence can be undertaken at subdivision stage.
65. There will be no hazardous installations proposed on the Site.

Geotechnical assessment
66. The PWDP planning maps show the Site as being "Liquefaction damage is unlikely. Standard investigation procedure outlined in NZS3604 is appropriate".

Contaminated land
67. A Preliminary Site Investigation can be carried out for the Site at subdivision stage.
68. An enquiry of ECAN has identified that two sites at the northern end of the Site potentially contain some contaminated land, which can be investigated further at subdivision stage **(Appendix 6)**. 315 Lehmans Road is an unverified HAIL site (previous use for clay target shooting) and 317 is registered as containing uninvestigated persistent pesticide bulk storage.

Servicing
69. Proposals for servicing the Site and the effects from such servicing in relation to domestic water supply, wastewater, stormwater, roading, and telecommunications will be required for any subdivision consent.

Economic effects
70. It is anticipated that urban development will generate positive economic effects, both from the investigation/development phase and for the longer run economic activity from householders participating in the local economy.

Climate Change effects
71. An assessment of the effects of the proposed rezoning on climate change is included as part of the assessment of a well-functioning urban environment above.
72. A well-functioning urban area that is designed and serviced in an integrated manner, applying sound urban design principles, will enable a reduction in greenhouse gas emissions compared to unplanned, ad hoc development that does not create compact urban forms located where the services and benefits of existing, established urban areas are not readily accessible.
73. There is a triangle of planning influence that can be brought to bear on reducing greenhouse gas emissions
a) Compact urban form minimising distances between homes and work/play options.
b) Proximity of homes to community facilities, services and amenities and business/work areas.
c) Design and provision of movement corridors and linkages that create opportunities other than for vehicles for getting

around.
74. The Site of the proposed rezoning:
a) Helps in retaining a compact urban form to Rangiora.
b) Is easily accessible to the town centre and is located convenient to the recreation resources of the nearby Rakahuri/Ashley River, the airfield and racecourse and Arlington Park.
75. Rangiora has excellent connectivity to the City, both via the Northern Motorway, the new Northern Corridor, a cycle way link to Kaiapoi which is linked to the new north city cycle way along the Northern Corridor and a very regular bus service.

Positive effects
76. The proposed rezoning will provide for the continued growth of Rangiora by managing the development through an ODP. The proposal will provide a buffer to on-going high level demand for lots in Rangiora. It will cater for a specific housing need not found in GRZ Zoned land nor LLRZ land. The proposed rezoning is anticipating a form of development that is a much more efficient use of a qualifying site supporting a well-functioning urban area. It is a positive endorsement of Rangiora as a growth node in the District.
77. The benefits derived from a planned ODP approach include facilitating high levels of connectivity, creating community links to identified focal points. The Site is close to recreation facilities. A coordinated and integrated development will provide a distinctive environmental quality and point of difference to the development.
78. The Site adjoins existing and developing residential development on the western edge of Rangiora.
79. From a community well-being perspective, the provision of additional land for residential growth will continue to support the Council's investment in community infrastructure by maintaining and facilitating growth rates, increasing the rating base and attracting development contributions.

STATUTORY PLANNING ASSESSMENT
80. Submissions must be assessed under the provisions of the RMA, including Part 2 and Section 32 (Requirements for Preparing Evaluation Reports).

National Policy Statements
National Policy Statement on Urban Development Capacity (NPS-UD)

81. The NPS–UD applies to this proposal as it is directed at Tier 1 urban environments, and
Tier 1 local authorities which includes Waimakariri District as part of the Christchurch urban environment that is defined in Table 1 of the NPS, and additionally defined as:
any area of land (regardless of size, and irrespective of local authority or statistical boundaries)
that: is, or is intended to be, predominantly urban in character; and is, or is intended to be, part of
a housing and labour market of at least 10,000 people.
82. The NPS-UD recognises the national significance of:
a) Having well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future; and
b) Providing sufficient development capacity to meet the different needs of people and communities.
83. The NPS outcomes are to be achieved through objectives that address:
a) Planning decisions improving housing affordability by supporting competitive land and development markets.
b) Regional policy statements and district plans enabling more people to live in areas of urban environments near centres or areas with employment opportunities, area well serviced by public transport or a high demand for housing in the area.
c) Urban environments developing and changing over time in response to diverse and changing needs of people, communities and future generations.
d) Local authority decisions on urban development being integrated with infrastructure planning and are strategic over the medium term and long term.
e) Local authority decisions on urban development are responsive particularly for proposals supplying significant development capacity.
f) New Zealand's urban environments support reductions in greenhouse emissions and are resilient to current and future effects of climate change.
84. The key method to achieve these objectives is by development of a Future Development Strategy (FDS). This will set out how the Councils will provide for sufficient development capacity over the next 30 years to meet expected demand. There is no FDS for the greater Christchurch Urban Area that meets the requirements of the NPS-UD.
85. Work on development capacity completed for the NPS - UDC 2016 by the Greater Christchurch Partnership as an Update of the existing Urban Development Strategy (UDS) – Our Space 2019 confirmed what there was a shortage of feasible development capacity for future housing in Waimakariri District for the medium (next 10 years) and long term (10 to 30 years) periods. That assessment is now out of date as it does not address the requirements of the NPS-UD; and rates of take up of land have exceeded projected rates.

86. One of the key changes in the NPS-UD is that local authority decisions on urban development that affects urban environments are responsive, particularly to proposals that would supply significant additional capacity. It also amends the required methodology for housing and business capacity assessments.
87. The current CRPS does not meet the new NPS-UD requirement in relation to proposals for significant additional capacity. Regional councils are required to include criteria in the RPS to determine what plan changes will be treated for the purposes of Policy 8 as adding significantly to development capacity as soon as practicable. ECAN has yet to respond to this requirement.
88. The NPS-UD has immediate effect, so in the meantime, proposals such as this submission must be assessed in the context of the overall intent and purpose of the NPSUD as articulated in the NPS-UD objectives and policies. This includes that NZ has well-functioning environments; provides sufficient development capacity to meet the different needs of people and communities; planning decisions improve housing affordability to contributing to competitive house and land markets; and RMA plans enable more people to live near major employment areas, where there is existing or planned public transport, and where there is high demand for housing.
89. The NPS-UD is the higher order document and its requirements override those of lower order documents where there is a conflict, including regional and district RMA plans.
90. Key objectives and policies in the NPS-UD are assessed here:

NPS-UD Objective/Policy	**Assessment**
Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	The proposed development will further enable Rangiora to sustain itself as a well-functioning urban environment by consolidating the residential area close to the town centre, and provide residential development close to public transport links and existing community and commercial facilities including Huntingdon Drive local centre.
Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.	The proposal provides choices in the Rangiora housing market and in doing so supports housing affordability. Whilst the proposal is for a premier larger lot urban residential development, it is important that all sectors of the market are catered for. This will be more affordable than forcing those wanting large sections out to the much larger and very limited areas of LLR D1 development, or having to purchase 2-3 sections in a standard residential subdivision. There Site is in multiple ownership and the landowners are working together to achieve the rezoning. It will bring more competition into the market by bringing new entrants into the market.
Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply: the area is in or near a centre zone or other area with many employment opportunities the area is well-serviced by existing or planned public transport there is high demand for housing or for business land in the area, relative to other areas within the urban environment.	The CRPS is due for review in 2024 but in the meantime the existing CRPS is not in accordance with the NPS-UD 2020. The proposed rezoning is on the edge of the District's largest centre, which offers a wide range of community and business services, and employment opportunities. It is expected that a proportion of future residents will commute outside the township, but as the township and associated business areas e.g. at Southbrook, continue to grow, this is expected to become proportionally less. Rangiora is well serviced with public transport, there is scope for future mass transit PP, and there is a high demand for housing at Rangiora. The Site adjoins the new West Rangiora Development Area, to the south. Extensions of public transport to service this growth area will be readily accessible to the Site.
Objective 6: Local authority decisions on urban development that affect urban environments are: integrated with infrastructure planning and funding decisions; and strategic over the medium term and long term; and responsive,	Whilst not currently identified as a future growth area in RMA documents, the Site is well placed at the township edge to be serviced by existing infrastructure. Some upgrades may be required, which will be investigated further with Council prior to the hearing. See Policy 8 below for commentary on proposals which supply

particularly in relation to proposals that would supply significant development capacity.	significant development capacity
Objective 8: New Zealand's urban environments: support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change	The proposal adjoins the existing built up are of Rangiora, close to public transport links. Its excellent accessibility to Christchurch City, substantially enhanced with the new Northern Motorway extensions, means it is now highly accessible to these nearby major employment areas. Travel distances are relatively short, minimising vehicle miles and the potential for greenhouse gas emissions. There is a cycleway link from into Christchurch City, and regular bus services, including an express route. The Site is inland and not subject to natural hazard risks associated with sea level rise arising from climate change.
Policy 1 – Planning decisions for well-functioning urban environments	Assessed at para 41-50
Policy 2 - Sufficient development capacity Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.	The proposed rezoning is anticipated to provide sections that will be available for the short term (up to 3 years) and into the medium term (3-10 years) if adopting a more conservative outlook. The locational and amenity advantages of Rangiora also favour strong ongoing demand. The PWDP UFD-O1 Feasible Development Capacity for residential activities identifies the need for 6300 residential units in the period 2018-2028, and 7100 residential units 2028-2048. These numbers are derived from Chapter 6 CRPS Table 6.1. and are out of date. Data from the Council (November 2021) confirms that there are about 800 vacant lots in Rangiora. Building consents are at about 180/year. That means there is about 4 years vacant land supply. A lead in time of 3-5 years is needed to go from rezone to house build so the Council is facing an unnecessary squeeze on land availability. That will translate in to an upward shift in land and section prices as has been the case at Rolleston. The data suggests that the PWDP will be late to the party to ensure there is at least sufficient development capacity to meet expected demand for housing land over the short term, medium term, and long term. There is a looming, inevitable land supply issue so any proposal to add capacity will push the Council closer to meeting the requirements of the NPS-UD. The proposal is consistent with ensuring there is at least sufficient land supply for housing.
Policy 8 – Responsiveness to plan changes Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is: (a) unanticipated by RMA planning	The proposed rezoning is not anticipated by RMA documents - it is not a Greenfield Priority or Future Development Area in the CRPS, or a New Development area in the PWDP. A responsive approach to the proposal is required as it meets the Policy 8 criteria for unanticipated zoning. It will contribution to well functioning urban environments and will add significant development capacity. There is no development capacity for the housing typology proposed – so any provision is significant in this context. The development will deliver appx 311 high amenity large lot residential sites at an average density of 1500m2. This will be higher if a mix

documents; or
(b) out-of-sequence with planned land release

of densities are proposed, which may be appropriate in some parts of the Site, dependent on master planning work to follow.

91. Adopting the submission to re-zone the land, and enable the proposed development on the submission Site will satisfy the objectives and policies of the NPS-UD.

Proposed National Policy Statement for Highly Productive Land (NPS-HPL)

92. The Government proposed in 2019 a NPS-HPL to prevent the loss of productive land and promote its sustainable management. The overall purpose of the proposed NPS-HPL is to improve the way highly-productive land is managed under the Resource Management Act 1991 (RMA) to:

a) Recognise the full range of values and benefits associated with its use for primary production
b) Maintain its availability for primary production for future generations
c) Protect it from inappropriate subdivision, use, and development.

93. The NPS-HPL is still a proposal and not intended to take effect until after Gazettal. At the date of this submission the NPS-HPL has no effect and no assessment of it is required for the purposes of this submission.

94. The Proposed NPS-HPL interim definition of HPL is land defined as Land Use Capability Class 1-3 soils. A portion of the Site contains Class 2 and 3 soils (see **Figure 10)**. Highly productive use of these soils is not realistic given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production). Its present use as lifestyle blocks, low level grazing and agistment is the more likely long run use of the Site if not rezoned.

95. Objective 3 of the Proposed NPS-HPL specifically refers to highly productive soils being protected by avoiding *"uncoordinated urban expansion on highly productive land that has not been subject to a strategic planning process"*. The Site was assessed through a strategic planning process (WDDS 2018) and the RRS as a preferred site for LLRZ development, and rejected for a change in zoning on the basis that it may be required for long term urban growth of Rangiora.

96. It is therefore considered that this submission to re-zone the Site is largely in accordance with the Proposed NPS-HPL.

National Planning Standards

97. The National Planning standards prescribe various matters under the RMA so that there is consistency among planning documents most relevantly here in terms of appellations for zones, and the standards applying to these zones.

98. The proposed rezoning adopts the standard zone appellation, in this case LLRZ as contained in the PWDP.

99. The PWDP identifies plan standards for minimum and average net site areas for the respective zones. These are modified for the proposed rezoning as a higher density LLRZ.

100. The higher density LLR zoning is entirely consistent with the NPS purpose for the LLRZ as reproduced below. In this case, the principal constraint to more intensive development is the peri-urban location where a lower density transition to the rural environment is appropriate (particularly noting that the zone boundary is 'mid block' so there is no natural or physical buffer between rural and residential areas); the existing pattern of 4 ha lots with existing substantial homes and gardens; and the fact that the premier large lot subdivision proposed relies on consistency of housing quality and character to be deliver on this vision for the area.

Large lot residential zone

Areas used predominantly for residential activities and buildings such as detached houses on lots larger than those of the Low density residential and General residential zones, and where there are particular landscape characteristics, physical limitations or other constraints to more intensive development.

Low density residential zone

Areas used predominantly for residential activities and buildings consistent with a suburban scale and subdivision pattern, such as one to two storey houses with yards and landscaping, and other compatible activities.[2]

Canterbury Regional Policy Statement 2013 (CRPS)

101. Chapter 6 of the RPS *"provides a resource management framework for the recovery of Greater Christchurch, to enable and support recovery and rebuilding, including restoration and enhancement, for the area through to 2028. Recovery in Greater Christchurch is also supported by the provisions in Chapter 5 notated as 'Entire Region'. The provisions in the remainder of the RPS also apply.3"*

102. An assessment of the proposed rezoning against the relevant CRPS Objectives and Policies is set out in **Appendix 1**. This should be read in the context of the CRPS being overdue for review and that it does not provide a regional response to the NPS-

UD. The
need to focus on earthquake recovery has now passed and so many of the directive provisions need to be given appropriate 'weight' in a new national policy environment with a focus on flexible, responsive panning approaches that better provide for people's needs and well-being.

103. That assessment shows that

a) The development proposal achieves the objectives for the location, design and function of new developments (Objective 5.2.1)

b) The traffic effects of the proposal are unlikely to give rise to adverse effects and so achieves CRPS objectives for the strategic land transport network (Policy 5.3.7)

c) The Site falls outside the FDAs shown on Map A of Chapter 6 and in that regard is inconsistent with RPS Policy 6.2.1 clauses 1 to 3.

1. identifies priority areas for urban development within Greater Christchurch;

2. identifies Key Activity Centres which provide a focus for high quality, and, where appropriate, mixed-use development that incorporates the principles of good urban design;

3. avoids urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS

d) The environmental effects assessment outlined above establish that the proposed development is consistent and will not give rise to any concerns with respect to all the matters listed in RPS Policy 6.2.1 clauses 4. to 11. These matters are:

6.2.1 Recovery framework

Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that:

1. As above;

2. As above;

3. As above;

4. protects outstanding natural features and landscapes including those within the Port Hills from inappropriate subdivision, use and development;

5. protects and enhances indigenous biodiversity and public space;

6. maintains or improves the quantity and quality of water in groundwater aquifers and surface waterbodies, and quality of ambient air;

7. maintains the character and amenity of rural areas and settlements;

8. protects people from unacceptable risk from natural hazards and the effects of sea-level rise;

9. integrates strategic and other infrastructure and services with land use development;

10. achieves development that does not adversely affect the efficient operation, use, development, appropriate upgrade, and future planning of strategic infrastructure and freight hubs;

11. optimises use of existing infrastructure; and

12. N/A

e) The proposed rezoning achieves policies relating to:

- Sustainability;
- Integration of transport infrastructure and land use;
- Urban design; and
- Biodiversity, natural hazards, landscape, soils, contaminated land.

104. In terms of the CRPS polices for rural residential developments (Policy 6.3.9) the proposal sits square with all policy matters other than being a location identified in an adopted Rural Residential Strategy; and being at a higher density than provided for under this policy (ie greater than 1-2 hh/ha). As such it has a majority of features entirely consistent with the policy.

105. The CRPS includes housing capacity targets as below

6.2.1a Targets for sufficient, feasible development capacity for housing [inserted in accordance with sections 55(2) and 55(A) of the Resource Management Act 1991, from the National Policy Statement on Urban Development Capacity 2016]

For the period 2018-2048, sufficient, feasible development capacity for housing is enabled in Greater Christchurch in accordance with Table 6.1.

Table 6.1 Targets for housing development capacity in Greater Christchurch, 2018-2048

106. These derive from Our Space, under the requirements of the then NPS-Urban Development Capacity 2016, since replaced by the NPS-UD 2020. The targets (known as bottomlines in the NPS-UD) are to be treated as 'minimums' not 'maximums'.

Policy 6.3.12
enables urban development in the Rangiora and Kaiapoi FDAs (new Development Areas in the PWDP) where needed to meet the medium term targets. This a 'minimum' allocation approach contrary to the NPS-UD. The NPS-UD favours over allocation, including in locations unanticipated by RMA plans, where it will add additional development capacity, can be integrated with infrastructure planning and funding, and will contribute to well functioning urban environments – as is the case the proposed Lehmans LLR D2 zone.
107. The proposed Lehmans LLR D2 zone is consistent with the CRPS except with respect to those parts of the CRPS which are out of step with and do not give effect to the higher order plan, the NPS-UD.

Proposed Waimakariri District Plan
108. An assessment of this proposal against the relevant PWDP Objectives and Policies for urban growth and development as notified on 17 September 2021 is set out in **Appendix 2.**
109. That assessment shows that the proposed rezoning is entirely consistent with the relevant objectives and policies, including as sought to be amended by this submission. Those amendments are to UFD-P3 Identification/location and extension of Large Lot Residential Zone areas; and LLRZ-O1 and LLRZ- P1-5 and reflect the intent and outcomes intended for the proposed LLRZ D2 zone, which is a higher density LLRZ zone than the PWDP LLRZ zone (renamed LLRZ D1 in this submission).

ASSESSMENT AGAINST OTHER PLANNING DOCUMENTS
Our Space 2018-2048 Greater Christchurch Settlement Update (2019)
110. Our Space is a non-statutory document prepared under the Local Government Act. It
"responds to the new Government Policy Statement on Land Transport, which has increased funding for mass public transit schemes, and meets the requirement of the National Policy Statement on Urban Development Capacity (NPS-UDC) 2016 to prepare a
future development strategy…. Specifically, it:
• sets out how targets for housing for the next 30 years will be met, accommodating an additional 150,000 people;
• identifies locations for housing growth, encouraging Central City and suburban centre living while providing for township growth in Rolleston, Rangiora and Kaiapoi;…
• promotes a compact urban form, which provides for efficient transport and locates development in a manner that takes into account climate change and sea level rise.[4].

..Underpinning this settlement pattern approach is the vision for a transformation of the transport network that fosters much greater public and active transport usage, and reduced reliance on the private vehicle.
111. Our Space acknowledges that this will require commitment from the Government to invest in the necessary improvements to our transport system, which could include investing in rapid transit services. To date, there has been no successful business case for improved public transportation, including not as a Covid 19 fast track infrastructure project.
112. The Our Space housing capacity targets (Table 3) and Future Development Areas are related to growth of urban areas.
113. Our Space, like the CRPS (and the Operative District Plan) are now out of date, as they do not reflect or give effect to the new requirements of the NPS-UD.

Waimakariri 2048 District Development Strategy (WDDS)
114. The preferred growth directions for Rangiora in the WDDS 2048 (2018) are outlined above (under 'Site') i.e. westwards to Lehmans Road, and otherwise eastwards. However, the Council in its decision on the RRS, recognized west of Lehmmans Road as a potential longer town urban growth area.
115. The WDDS Rangiora Snapshot (pp38-39) -when looking ahead to 2048 proposed that:
a) Rangiora remains the District's largest town
b) 30,000 – estimated population (2048)
c) 12,025 – estimated households
d) 5,025 - new households in Rangiora
e) Continues to accommodate one third of the District's residential growth
f) 167 – estimated annual building consents for new dwellings for the next 30 years
g) 423 hectares of additional feasible residential land required by 2048 (this includes capacity in remaining stages of existing residential developments as well as new greenfield areas inside and outside of the Infrastructure Boundary)
h) Future residential growth directions proposed to the east (predominantly) and west of the current town
i) Opportunities for intensification/regeneration to be identified
j) New growth directions take into account areas of unacceptable natural hazard risk and areas of significant environmental and cultural values
k) New growth areas to connect into existing sewer and water networks

l) Stormwater Levels of Service designed to meet increased performance requirements

116. At the 2018 Census Rangiora had a population of 17,841, and 7314 total dwellings (incl those unoccupied and under construction). Population projections for the District show an average annual change 2018-2020 of 1700 persons. If Rangiora continues to attract a third of all district growth as stated in the WDSS then Rangiora's population in 2021 will be around 18,900.

Mahaanui Iwi Management Plan

117. Part 1 of the PWDP in a section "Mana Whenua" sets out the position with respect to iwi and the review of the district Plan:

a) The District's territorial area sits within the takiwā (territory) of Ngāi Tūāhuriri which is one of eighteen Ngāi Tahu regional papatipu rūnanga, constituted under the ***Te Rūnanga o Ngāi Tahu Act 1996*** *to represent* ***mana whenua*** *interests.*

b) The preparation and change of a district plan must take into account relevant iwi documents. For the District, Ngāi Tahu has set out its resource management values, issues, objectives and policies within the Mahaanui Iwi Management Plan (2013).

c) The Mahaanui Iwi Management Plan identifies objectives, issues and policies for natural resource and environmental management for six pāpatipu rūnanga (including Te Ngāi Tūāhuriri Rūnanga). It seeks to ensure that the taonga and resources of Ngāi

Tahu mana whenua are recognised and protected in the decision-making of statutory agencies. The Mahaanui Iwi Management Plan contains a comprehensive suite of policies and objectives addressing the range of resource management matters of significance to tangata whenua. The District Council shall have regard to the Mahaanui Iwi Management Plan when preparing or changing the District Plan, to the extent its content has a bearing on resource management issues of the District.

118. The Mahaanui Iwi Management Plan (MIMP) 2013 was released on 1 March 2013.

119. The MIMP is a tool for tangata whenua to express their identity as manawhenua and their objectives as kaitiaki, to protect their taonga and resources, and their relationships with these. The MIMP seeks to ensure that these taonga and resources are recognised and protected in the decision-making of agencies with statutory responsibilities to tangata whenua. Importantly it is also a tool that assists Papatipu Rūnanga representatives to articulate their values, issues and policy into statutory processes.

120. The MIMP includes both general objectives and policies about the management of land, air, and water, and also includes catchment specific objectives and policies.

121. Section 5.3 Wai Maori (pp77-98) contains an extensive discussion about tangata whenua rights and interests in freshwater. It provides a suite of Issues, Objectives and Policies for freshwater

122. Section 5.4 Papatuanuku (pp101-124) sets out the Ngai Tahu Subdivision and Development Guidelines that are to be read along-side objectives relating to:

a) Land use planning and management in the takiwā reflects the principle of Ki Uta Ki Tai. (from the mountains to the sea)

b) Rural and urban land use occurs in a manner that is consistent with land capability, the assimilative capacity of catchments and the limits and availability of water resources.

c) Inappropriate land use practices that have a significant and unacceptable effect on water quality and quantity are discontinued.

d) Ngāi Tahu has a prominent and influential role in urban planning and development.

e) Subdivision and development activities implement low impact, innovative and sustainable solutions to water, stormwater, waste and energy issues.

123. Section 5.5 Tane (pp127-137) includes objectives that focus on:

a) Regional policy, planning and decision making in the takiwā reflects the particular interest of Ngāi Tahu in indigenous biodiversity protection, and the importance of mahinga kai to Ngāi Tahu culture and traditions.

b) The customary right of Ngāi Tahu to engage in mahinga kai activity is recognised, protected and enhanced…

c) Customary use, and therefore mahinga kai, is given effect to as a first order priority for freshwater management in the takiwā.

124. Section 6.4 (pp213-224) addresses issues of particular significance to the lands and waters of the Waimakariri catchment within which the Site lies.

125. Relevant Objectives relating to urban development of land in that catchment include:

a) The natural "energy, vitality and life" of the Waimakariri River as a braided river is protected and restored.

b) The discharge of contaminants to the Waimakariri and its tributaries is eliminated.

c) Water quality and flows in the Waimakariri and its tributaries are improved to enable whānau and the wider community to have places they can go to swim and fish.

d) The mauri and mahinga kai values of the Waimakariri and its tributaries and associated springs, wetlands and lagoons are protected and restored; mō tātou, ā, mō kā uri ā muri ake nei.

126. A key issue relating to subdivision and development is that subdivision and development activities in the lower catchment

have the potential to adversely affect Ngāi Tahu values such as waterways, mahinga kai and sites of significance (Issue Wai4).
127. The proposal provides for full urban reticulation of the three waters and is consistent with the objectives and policies contained in Chapters 5.3 and 5.4 of the MIMP. The proposal does not preclude individual land owners from installing rainwater collection and use from roof areas at the time of building development.
128. The proposal has been designed taking into consideration the potential effect of resultant subdivision and development on the rivers and streams that flow into the lowland rivers.
129. Overall it is considered that the proposal will not have adverse impact on the cultural values of iwi as set out within the MIMP.

SECTION 32 ASSESSMENT

130. A Section 32 assessment is contained in **Appendix 3.**
131. In summary, the PWDP zoning and associated rules (RLZ Zone with a minimum lot size for subdivision and a dwelling 4ha) do not meet the needs and aspirations of the current owners.
132. Strategic Council planning documents (specifically the WDDS) have a focus on only meeting urban growth demands within urban environments of existing towns. They favour intensification (15hh/ha) and a strict allocation of capacity by development areas. It is a control and command regime consistent with Map A of Chapter 6 of the CRPS but is out of step with the requirements of the NPS-UD which requires a more flexible, responsive approach, prohibits a hard fixed unmoveable urban/rural boundary.
133. This approach leaves little room for new proposals or proposals that do not sit square with the standard array of GRZ/medium density or SETZ (Settlement Zone). SETZ applies to some of the District's smaller settlements outside Greater Christchurch.
134. Neither LRZ nor Large Lot Residential (LLRZ) as notified in the PWDP is an efficient use of this block of land located as it is immediately adjoining the urban area of Rangiora, and in a location easily accessible to the town centre by active transport modes as well as car and several district reserves.
135. If this Site is not zoned for LLRZ D2 (minimum average lot size 1500m^2) use to enable residential re-development then it will drive pressure to re-zone elsewhere. That step potentially will not have the significant benefits to Rangiora long term in relation to enabling a well-functioning urban environment that enables people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future. Additionally re-zoning to LLRZ D2 will contribute to providing additional development capacity to meet the different needs of people and communities in a planned manner and consistent with the NPS-UD.
136. The Site can readily be developed to reflect the principles of the Urban Design Protocol with values of character, context, and connectivity.
137. The Section 32 assessment concludes that the proposal to re-zone the Site from LRZ zone to LLRZ D2 Zone (average lot size 1500m_2) is the most appropriate method for achieving the objectives of the proposal, than the other alternatives considered.
138. Option 2 identified in the s 32 assessment is consistent with some PWDP policies notwithstanding that it does sit square with the strategic intentions signaled in the WDDS and the PWDP approach to providing for development capacity and urban development.
139. Option 2 identified in the s 32 assessment to re-zone the Site is the most appropriate given:
a) The proposals adopt the PWDP zones, development and activity standards with appropriate amendments. This ensures continuity of the District Plan anticipated environmental outcomes and urban amenity for Rangiora and adjoining residential areas;
b) Will be consistent with and give effect to many of the relevant PWDP objectives and policies;
c) It is a logical extension to the developed and developing residential land adjoining the Site while achieving a compact, efficient urban form that removes pressure on isolated rural land elsewhere around Rangiora.
d) It gives effect to the NPS-UD, specifically Objective 6 c) and Policy 8, delivering significant additional development capacity and contributing to a well functioning urban environment.
e) It is assumed that there will be capacity in the public utilities and the existing road network, including planned upgrades, to accommodate the traffic effects of the redevelopment;
f) The proposed Site specific ODP will provide certainty of the final form and disposition of the re-zoned area including its proposals for reserves, roading, future linkages for pedestrian and vehicular traffic.
140. The re-zoning proposal is considered to be appropriate to achieve the sustainable growth and development of Rangiora.
141. The economic, social and environmental benefits of the proposed rezoning outweigh any potential costs.
142. The overall efficiency and effectiveness of the proposed rezoning (Option 2) is high, in comparison to the alternative options set out in the s 32 Assessment which are low (Options One and Four) or low to moderate (Option Three).
143. The PWDP proposes to release land for development in the new Development Areas at Rangiora and Kaiapoi through a novel and untested certification process that is not clearly derived from RMA statutory powers, nor Local Government Act 2002 (LGA) authority. This approach is not proposed for the LLR Overlay areas. As the proposed Lehmans Road LLR D2 zone proposed by this submission seeks large lot urban densities, it is anticipated that Council may favour the certification process if it accepts the proposed rezoning. This is opposed – rezoning to LLRZ D2 is sought.
144. Potential difficulties with the proposed certification process are identified and discussed in the Section 32 Assessment.

(**Appendix 3)**. In summary, the process is hugely discretionary, does not provide conventional rights to an applicant (eg right of objection/appeal) meaning decisions cannot be challenged, and it is not apparent that the process will be appropriately documented with a transparent record of the decision-making within the certification process. Further uncertainty arises in the practicalities of how to negotiate and manage the staging, funding and building of key infrastructure across a range of Sites, and a risk that land supply is controlled by a limited number of large developers. It is a far less efficient and effective method for delivering land for housing than the Council rezoning the land in the PWDP.
145. The proposed rezoning is considered to be the most appropriate, efficient and effective means of achieving the purpose of the RMA.

CONSULTATION
146. The landowners and their consultants have submitted on the WRRS and the WDDS (**Appendix 4)**.
147. The submissions to re-zone as rural residential or identify the Site as suitable for LLRZ have been rejected as noted above. LLRZ but at higher densities as now proposed is considered to be a more efficient use of the land and better meets market demand. 5000m^2 sites provide more land is needed for a spacious home and garden.
148. The landowners have been consistent in their wish to find a zone and possible land uses better suited to their needs.

CONCLUSION

173 The submission seeks to rezone 58 ha of land adjoining Rangiora from Lifestyle Rural Zone (LRZ) to Large Lot Residential with a specific density standard (LLRZ D1), minimum average lot size 1500m^2.
149. The Site has a long history of rural lifestyle use. It is not significantly restricted by potential natural hazards especially flooding, nor does it have physical limitations for development for residential purposes as it is not liquefaction prone, and has no known geotechnical limitations but does contain an area of LUC 2 soils. It is near a site of significance to iwi (SASM – 025) being the Rakahuri/Ashley River The Site has access to a collector road and is near to a strategic road giving direct access to the town centre and a range of community amenities and facilities.
150. The Site immediately adjoins the urban area of Rangiora, and is well located to join in to Council utility services. It is well suited for conversion to residential use.
151. The Site is not identified within the westward growth direction for Rangiora in the District Development Strategy 2018 nor is it part of the DEV-WR development area which adopts Lehmans Road as its western boundary. It is in a location that achieves coherent and compact urban form offering ease of access to business services, community facilities, reserves and the primary road network.
152. The proposed rezoning provides for a connected and high amenity residential living environment not presently available under the PWDP while avoiding and/or mitigating any potential adverse effects on the environment. It will provide for continuing high demand for a variety of high quality residential sections aimed at a particular segment of the housing market in an ideal location, easily accessible to the existing town centre services and facilities. It will broaden the range of housing available. As such, it is consistent with the NPS-UD including Objective 6c) and Policy 8, to be responsive to proposals which supply significant development capacity and contribute to a well functioning urban environment.
153. The use of this Site for residential purposes can be a sustainable and efficient use of land and infrastructure. The proposed rezoning better provides for the social, economic, environmental well-being of the landowners and the Rangiora community than continuation of the current low intensity lifestyle land use on 4ha blocks, or a conventional LLRZ residential use.
154. Any potential adverse effects of the implementation of the proposed rezoning can be assessed at subdivision stage but there has been no restriction on servicing the blocks to date. Capacity will need to be confirmed for infrastructure, power and road network. Any future subdivision of the Site will need to confirm water supply and wastewater treatment and disposal options.
155. Rezoning of the site to LLRZ zone is not inconsistent with the policies and objectives of the PWDP, but it is at odds with the dated CRPS approach to provision of urban growth and housing capacity for Greater Christchurch, to the extent that it is not within an FDA created by Change 1 to the CRPS and is not identified as an LLRZ site under the strategic RRS prepared by the Council.
156. As the proposal helps achieve the purpose of the RMA, and has been shown to be consistent with the relevant provisions of the NPS-UD, the submission can be accepted by Waimakariri District Council.

Original Submission

Summary Reasons for the Submission

The reasons for our submission are outlined below.
a) The preferred relief (**the proposed rezoning**) is both appropriate and necessary to achieve sustainable growth and

development of Rangiora and the District and meet the requirements of the National Policy Statement for Urban Development 2020 (**NPS-UD**).

b) The Site identified in Figure 1 and at para 1 of the Preferred Relief above is a logical and preferred location that lends itself to a specific type of housing development not provided within the PWDP as a residential option adjoining but outside the existing urban areas. Nowhere is it possible to develop in a comprehensive, coordinated way a low density, high quality residential environment in the District's towns, the Rural Lifestyle Zone or Settlement Zone as a permitted activity.

c) The requirement for 12/15 hh/ha in GRZ zones (the majority of land in urban areas) drives development to modern scale relatively small urban lots best produced as a package across a significant land holding. The GRZ subdivision standards do not provide for the needs of people who seek a generous sized urban lot residential setting. This is a housing sector that is running against the planning tide of intensification but is, nonetheless, a legitimate form of housing in an appropriate setting. The barriers to such development in urban areas requires an appropriate setting/ location in the rural areas but close to or adjoining the urban areas and at a much lower density than is desired or appropriate (the PWDP LLRZ) to meet the housing needs for generous sized urban lot residential living..

d) The PWDP subdivision standards for LLRZ require lots that are very large for those whose primary interest in a rural setting is a form of residential living, not one that requires significant maintenance and management often involving animals or machinery at scale. Conversely, the GRZ subdivision standards do not provide for the needs of people who seek a large lot residential setting

e) The focus in the PWDP is on prescribing a limited range of residential options and tightly controlling and constraining housing choice within those options. Further urban growth is also tightly constrained and controlled around DEV areas around Rangiora and Kaiapoi but for a very specific form of residential development driven off density requirements that do not match the needs of all landowners.

f) The focus in most new District Plans, driven in part by the National Planning standards, is to simplify the range of zones, to standardize lot sizes, to supposedly create efficiency and certainty through ease of administration of the District Plans. This is done by constraining housing and land development choices by lot size, by location, by built standards and the disposition of built/open elements in a site. However, the National Planning standards do provide for large lot urban residential living, a residential living option which has not been taken up the PWDP (due most likely to the restrictive provisions of the CRPS which only prescribe one from of lower density residential living, at a density of 1-2 hh/ha).

g) This planning approach may be a standard approach to resource allocation but it does not provide a flexible, responsive approach to innovative and new development options. The Government is creating policy settings that on one hand seek intensification in urban areas, while at the same time pushing away from a land allocation model of planning. The PWDP in striving to face both policy directions has a package of measures that are in fact a major barrier in terms or cost, timeframes and certainties for proposals that are not cut from the suite of housing and development options set out by the PWDP. The allocation of land in preferred development areas, it must be said, runs counter to the Government's push, and now its direction, to free up land for development, to encourage innovation in housing (presently with a focus of intensification) and to make available a range of responses to the need to meet the housing needs of people and communities set out in the NPS-UD.

h) While the weight of demand (and the planning response) is around affordable housing, around small lots and dense development that supports investment in public facilities and amenities such as public and active transport, reserves, and commercial services, there is always a wide spectrum of preferences at play in the housing market. The demand for high quality, generous houses set on generous sized parcels of land within high amenity settings is an important and no less relevant housing sector. There is a strong unmet demand, as confirmed by advice from Bayleys real estate (**Appendix 5**) for larger family homes with room for a pool or similar. Purchasers want to be close the amenities of Rangiora and within walking and cycling distance of local schools. They do not want the only available options – a 4 ha lifestyle block or 5000m^2 rural residential site at Mandeville or Ohoka.

i) Interestingly enough for a nation built on the so-called quarter acre paradise, recent policy and planning interest in housing and land development has now seemingly positioned the 1011m^2 section as a luxury item, as the antithesis of providing for community well-being and needs. It is as though the old quarter acre of itself acts against building a sense of community despite being able to be developed in a planned, structured, coordinated or integrated manner. Rather than being a frivolous discretionary item in land development
and housing choice, a well-planned, well located and properly serviced low density residential environment has much to offer urban environments. They can be tactically used to provide shape and edge to urban areas, they can provide a mass of amenity different from (and potentially complementary to), but no less legitimate in urban outcome terms, to conventional GRZ zoned land.

j) In many ways the approach of a district plan to the role and place of the old quarter acre is not dissimilar to the issues faced by comprehensive retirement villages when first proposed. The idea of dense, almost gated and self-contained communities, with multi storey buildings also did not sit well in many district plans. But now they are accepted as an important part of the urban fabric catering to a specific demographic and health demographic. Most plans enable them.

k) Provision for low density residential in an urban setting, or failing that likelihood, in an adjoining rural zone is a fundamental gap in the district plan.

l) The submission seeks to provide for another housing typology not provided in the PWDP and in a location with significant planning merit. The planning case was made out in a detailed submission to the proposed Rural Residential Strategy (**RRS**) for

the land identified in this submission to be “reserved” for conventional Rural Residential zoning in the review of the District Plan. That submission was rejected in favour of a decision ascribing an unspecific strategic significance to Lehmans Road as the urban boundary; simply the decision was that rural residential development here would preclude this area as a future urban growth path, even though this was likely to be very long term as the Waimakariri District Development Strategy (WDDS 2018) for the period up to 2048, does not favour urban growth west of Lehmans Road.
Officer Recommendation
Continue to exclude the area west of Lehmans Road and the racecourse land at Rangiora as growth areas as these were originally considered but not included in the draft RRDS as they trigger the key preliminary criteria of: being on the direct edges of a main town outside of the Projected Infrastructure Boundary (PIB) thereby foreclosing more intensive long-term urban development, and…

Panel Recommendation
The panel accepted the officer recommendations to exclude areas on the fringes of Rangiora in the final RRDS due to these having the potential to foreclose more intensive long-term urban development of the town.

m) In light of the above decision on the Waimakariri Rural Residential Strategy, the proposal now is for a form of high amenity low density urban zoning, which whilst in demand is entirely absent from the PWDP. This will be a long term urban form of development. The proposal set out in the submission will achieve a compact, and efficient, urban form on the edge of Rangiora with excellent connectivity by multiple transport modes. It provides for continuous urban development by enabling a built form which can act as a strong zone or urban boundary.

n) The proposed rezoning will accommodate approximately 311 LLRZ lots1 at the proposed amended density standards for LLRZ D2 (average size 1500m^2). It will contribute to a well-functioning urban environment, meeting the NPS-UD Objective 6(c).
o) Any adverse effects on the environment arising from the proposed rezoning will be minimal, if any, and can be adequately mitigated. A high amenity master planned development is proposed.
p) Significant positive effects arise from the proposed rezoning. It will enable the short term housing demand at Rangiora to be met, and can deliver a housing typology for which there is demand, on lots that are not a burden to the landowners (which is the case for 4ha and the very limited areas of LLRZ D1 with a density of 1-2 hh/ha) and for which there is no provision in the PWDP. At present rates of land uptake there is about 4 years vacant land supply in Rangiora. Given it takes 3-5 years to bring land from zoned state to on the market as developed lots, there is some urgency in providing additional capacity. This proposal helps address an anticipated shortfall in residential zoned plan enabled land.
q) There is no additional cost to the Council in re-zoning the Site as there is expected to be capacity in the public utilities and the existing road network, including planned upgrades.
r) Amendments to PWDP objectives and policies may be necessary to provide for a higher density LLRZ, but of themselves will not act against those relating to Strategic Directions Urban Form and Development and Urban Growth. The PWDP approach to zones and
identification of future development land is already out of step with higher order Resource Management Act 1991 (RMA) statutory documents because they do not give effect to the NPS-UD (and are sought to be amended through this submission).
s) The alternatives of retaining Rural Lifestyle or Large Lot Residential zone across the entire Site are not an efficient use of land which immediately adjoins the urban area of Rangiora, and is highly accessible to the town centre by active transport modes as well as car.
t) The proposed rezoning is consistent with and the most appropriate, efficient and effective means of achieving the purpose of the RMA.

The Site
1. The Site is a 58ha block of land (‘the Site’) accessed from Lehman Road, Rangiora **(Figure 1)**. It is owned by the two submitters and 12 other landowners.

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1 Assumes 20% of land area taken for servicing including roading, reserves and stormwater management if required.

Figure 1: The site (outlined in blue (Google Earth)

2. The Site is surrounded by RLZ land that is used for a mix of lifestyle and conventional farming. To the NE is the Rangiora Eco Holiday Park, and beyond the Park is the Rangiora Racecourse about 300m away from the nearest lot and 1km from the centre of the Site. Land to the south east is GRZ and part of urban Rangiora with newly developing residential land west of West Belt. About 1.9 km to the NW is Rangiora Airfield. About 1km north of the most northern lot is the Ashley River.
3. The southern-most lot in the proposal with the Rangiora Vet Clinic faces, but does not have access to Rangiora-Oxford Road (State Highway 72). This arterial road provides the main road connection in to the centre of the town. The well-established Fernside Rural residential area is about 2.5km west from the junction of Lehmans and Rangiora-Oxford Roads.

Figure 2: the site is a broader context (Site marked red)

4. The Site is not identified as lying within a preferred growth direction for Rangiora in the Waimakariri 2048 District Development Strategy (2018) (**WDDS**) **(Figure 3)**. No land west of Lehmans Road is included in the West Rangiora Development Area (**DEV-WR**) in the PWDP.

Figure 3: Figure 11 WDDS

5. The Council reviewed its strategic approach to the location and provision of Rural Residential land (now zoned LLRZ in the PWDP) in the WDSS. It adopted the position that it would:

a) Explore tools such as cluster development to manage rural character

b) For rural residential development, adopt an approach that has a primary focus on creating new rural residential areas, with a secondary focus on enabling large lot intensification within existing rural residential areas where there is sufficient community support and servicing available

c) Review the Rural Residential Development Plan for the whole District (pg 21 WDDS).

6. Rangiora presently has a population of 17,841 (2018 Census). It grew steadily between 2006 and 2018. Growth of Rangiora since then has continued in step with the district growth which has increased 8.2% between 2018 and 2021 from 61,300 to 66,300 at an annual average of 2.8% from 2018 to 2020 (Statistics NZ Subnational population projections at 30 June 2021: provisional).

2006 (count)	**2013 (count)**	**2018 (count)**
12,165	15,069	17,841

Statistics NZ

Population projections at 30 June

PLANNING STATUS OF THE SITE

Chapter 6 of the Canterbury Regional Policy Statement

7. An assessment of the CRPS is set out in **Appendix 1** to this submission.
8. The Site is within the Greater Christchurch area.
9. It was not shown as a Greenfield Priority Area – Residential (GPA) on Map A of the Canterbury Regional Policy Statement (CRPS). The GPA terminates at Lehmans Road.
10. As a result of the Minister for the Environment's decision of 28 May 2021 on Change 1 to Chapter 6, an area largely south of Oxford Road and a finger of land to the north of Oxford Road was included as a Future Development Area (**FDA**) (**Figure 4** orange).

Figure 4: Map A Chapter 6 Regional Policy Statement Greenfield Priority areas
Site location identified with red circle (appx)

11. The FDAs are intended to accommodate the increased demand for new dwellings in that part of Waimakariri District within the Greater Christchurch Urban Area and to respond to the NPS-UD. They do not provide "plan enabled" land as they need to negotiate a rezoning process to confirm their status as land developable for housing and other urban purposes.
12. The proposal for a LLRZ zone with average lot sizes of 1500m2 is inconsistent with the policy approach of Chapter 6 for Greater Christchurch, in that if fits none of the residential living typologies provided for in Chapter 6 and is not in a location identified for urban or rural residential development. It sits 'between' the urban and rural residential densities provided for in the CRPS (minimum 10 hh/ha for urban in Waimakariri, and average 1-2 hh/ha for rural residential). The proposed density is appx. 6.66 hh/ha.
13. Notwithstanding, the proposal meets all the location and other criteria in CRPS Policy 6.3.9 for rural residential development. It is:

- Outside the CIAL noise contours
- Has some sites with restrictions from the take-off and landing vectors for Rangiora Airfield but not such as to impact its operational capacity.
- Is outside the groundwater protection zone
- Is not within the Waimakariri stop bank system
- Has no views of or to the Port Hills
- Has good access for emergency services
- Will not create reverse sensitivity issues with adjoining land uses; Rangiora Racecourse is 500m away.
- Free of significant natural hazards and is a flat site.
- Supports no significant natural values or ecological values.
- Contains no SASMs.
- Can be integrated into or consolidated with the existing urban area of west Rangiora.
- Contains no surface water bodies so there will be no adverse impacts on these.
- The development will be contingent on an ODP to provide integrated design for subdivision and land use, and provide for the long-term maintenance of a high quality high density rural residential character.
- The proposal is not intended as a staged development towards full urban; rather it is intended to provide a unique residential environment that can stand alone and contribute to the urban fabric of Rangiora like Palmview in east Rangiora, or as Kaiapoi Lakes does for Kaiapoi.

14. Overall, the proposal is not consistent with Chapter 6 but that is more a function of its original purpose when formulated in 2013. Notwithstanding that, the submission for a lower density residential focussed, high quality urban environment that attaches to an existing urban area and that promotes a coordinated pattern of development has planning merit.

Operative Waimakariri District Plan
15. The Site is zoned Rural in the Operative Plan. The minimum lot size for subdivision and a dwelling is 4 ha.
Proposed Waimakariri District Plan
16. The Site is zoned Rural Lifestyle Zone **(LRZ) (Figure 4).** The minimum lot size for subdivision and a dwelling in the LRZ is 4 ha.
17. Oxford Road is a strategic road and Lehmans Road is a collector road.

Figure 5: Proposed District Plan Zoning (site outlined in red)

18. The Site is also subject to, or potentially influenced by, a number of Overlays:
    a) Rangiora Airfield Take Off Climb and Approach Obstacle Limitation Surface (**Figure 6**)
    b) National Grid Transmission Lines (**Figure 6**)
    c) Liquefaction: Liquefaction damage is unlikely (**Figure 6**)
    d) Non-Urban Flood Assessment Area (**Figure 7**)
    e) Geographic areas: Ecological Area – Plains

f) Ecological District – Low Plains

Figure 6: Rangiora Airfield Take-off and Approach vectors (blue dashed lines); Liquefaction damage unlikely (green)Transmission lines (green lines); Site outlined in red

Figure 7: Non-urban flood assessment & Waimakariri Flood Hazard maps
Blue – medium risk, green – low risk, white – very low

DEVELOPMENT PROPOSAL AND PROPOSED REZONING

19. Subdivision of the Site will create approximately 311 LLRZ D2 lots.
20. The key design drivers for the proposal are:

a) A high amenity premier residential zone with large houses on large sites – average 1500m^2, min 1000m$_2$ based on the St Kilda, Hamilton development concept (**Figure 8**).

b) LLRZ D2 standards would enable a lower density zone in the medium term e.g. 10 years to achieve a high quality consistent character subdivision. If developed as an integrated development subject to an ODP subdivision can be staged for to the proposal.

c) Creating strong connections with the immediate neighbourhood by providing a cohesive interconnected roading layout that picks up direct links to the eastern neighbourhood off Lehmans Road and the northern subdivision roading, and carries them into the Site.

d) Creating a high amenity and diverse residential neighbourhood by providing interfaces to roads, reserves and rural environments.

e) Respecting and building on local identity and character of Rangiora by retaining specific vegetation features from the Site, and anchoring the development into the wider landscape.

21. A development concept can provide for sound urban design by:

a) A hierarchy of movement corridors.

b) Prioritisation of walking and cycling.

c) A north-south alignment of street blocks to maximize solar access and provide for efficient use of lots.

d) Block perimeters being kept as small as practicable to aid permeability and higher public amenity.

e) Enabling a range of housing typologies set in high quality landscape and street setting with generous amenity plantings and curtilage.

Figure 8: St Kilda development images (Bayleys)

22. St Kilda, Cambridge is a premier development on the outskirts of Cambridge, centrally located and with easy access to the Waikato Expressway. It was originally part of a small dairy operation which was dissected by the Waikato Expressway, leaving a portion within the Cambridge Town boundary and the larger balance of the property of approximately 80 ha (which became St Kilda) on the Eastern side of the Expressway, left in the Rural Zone.
23. The initial development concepts were for a Rural Residential type development given the Expressway separation of the existing residential development on the Western side of the Cambridge Bypass, however this was not supported by Council and a new concept of larger residential sections of a 1600m² average size was developed and approved – see https://www.stkilda.nz/page/location/

EFFECTS ON THE ENVIRONMENT

Township growth and urban form

24. The Site immediately adjoins the western edge of urban Rangiora.
25. The WDDS indicated a general preference for the direction of urban growth of Rangiora to the east as a way of balancing up the residential areas around the town centre and some growth to the west.
26. The approach of the WDDS was to signal growth options to be confirmed in the District Plan Review:

The broad directions for greenfield residential growth for the District's main towns are set out in Figures 11 to 14. Further work will be carried out to identify and confirm the exact locations and extent of these residential growth areas, together with the intensification opportunities within existing urban areas. These will be enabled through the District Plan Review and other planning tools.

27. The Strategic Planning documents clearly signal active consideration of growth needs and growth directions. The options available to the Council were constrained by the approach of the CRPS as the District Plan has to give effect to the CRPS and cannot be
inconsistent with it. The CRPS took effect in 2013 and is overdue for review.
28. The CRPS tightly holds urban growth to the constraints of Map A Chapter 6 and the identified FDAs which although amended by Plan Change 1 in 2020 does not respond to the directions of the NPS-UD. In any event the approach is focused on the need for housing in full urban residential land, less on other residential development forms.
29. As such the Site falls outside the planning policy framework for urban growth. However, in terms of urban form and on the ground, there is considerable merit and logic to conversion of this existing LRZ land to a new high amenity residential form that can be integrated into the Rangiora urban fabric.
30. The proposal has the potential to anticipate the longer term growth path confirmed by the decisions on the RRS to protect the future growth option of more intensive urban development in this direction. It can set a pathway to further westward expansion on land
that holds few if any physical barriers to land development.
31. The proposal will contribute to the housing needs of Rangiora and in a form and location that does not undermine the long run urban form of Rangiora. Planned growth confirmed in the PWDP is already intended to extend westwards out to Lehmans Road and to keep the town edge squared up providing depth to future development and providing a rational basis for providing movement networks driven off the key roads such as Rangiora-Oxford Roads. The West Rangiora Future Development Area confirms this approach. The Site sits in the next block west of Lehmans Road so is not proposing a disjointed urban form, nor one that is not part of the long term thinking of urban form and growth for Rangiora.

32. A full residential zoning is proposed under LLRZ D2 and will provide a high quality street character, overall amenity and passive surveillance over the street, and will create the correct lighting standards, roading standard, fully formed footpaths and cycleways required for a high quality urban environment.

Neighbourhood and wider community effects
33. The Site is serviced by a collector road and is close to an arterial road. This provides for ease of access and safe and convenient movement to and from the Site. A planned development co-ordinated by an ODP can facilitate within the site movement corridors and linkages through the Site to provide for walking and cycling.
34. A key positive neighbourhood and community effect will arise from the existing dwellings and their established gardens and plantings that will anchor new development and provide a point of reference for new dwellings. Development will not be on a bare site; it will take place in an existing established part-residential setting. The transition to a low density, high quality premier residential development will start from a favourable position and minimise the apparent extent and nature of the landscape change.
35. The Site is comparatively large (58.4 ha) and has the potential to support a variety of residential building typologies and this will contribute to a mix of households within the development and provide built form variety and interest in the streetscape. Whilst LLR D2 standards are proposed, it may be that part of the Site is suitable for other higher density forms of development, which would be within scope of the alternative relief, and could be considered as part of the master planning process required for preparation of an ODP (ahead of the hearing). The earlier stages of the St Kilda development were for large lot residential, with more clusters of townhouses included as later stages (and a retirement village). A retirement village is unlikely in this case, given the proximity of the Charles Upham Retirement Village.
36. Rangiora is well-positioned to accommodate and service the needs of a fast-growing resident population that will in turn support more business activity, schools, community facilities and community organisations.

Effects on tangata whenua values
37. The Proposed District Plan does not identify any Sites and Areas of Significance to Maori in the Site, but the nearby Rakahuri/Ashely River identified as SASM-025. This has been scheduled as being
River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species
38. The PWDP has Policy SASM-P8 which is relevant to pre-development processes:
Engagement with rūnanga
Te Ngāi Tūāhuriri Rūnanga and the District Council to encourage engagement with the Rūnanga priorto persons undertaking activities and/or applying for resource consent where the activity has thepotential to adversely affect identified sites or areas of Ngāi Tūāhuriri cultural significance. Where priorengagement with Te Ngāi Tūāhuriri Rūnanga h as not been undertaken by an applicant for an activitythat has the potential to adversely affect an identified site, the District Council will consult with the Rūnanga.
39. The Site is not listed as an archaeological site on the NZ Archaeological Site database.

Landscape and visual effects
40. Rural Lifestyle style development exists on the Site now (a series of 4 ha lots with a dwelling and associated accessory buildings on each). The landscape is dominated by shelter belts, utility buildings, significant trees and planted curtilages around

dwellings many of which are well set back off the roads down RoWs.
41. An ODP will help to achieve an integrated, cohesive and coherent development The proposal will lead to a modification of the landscape of the Site from a predominantly lifestyle block landscape to a denser semi-urban environment dominated by residential building that will, in time, get the benefit of street tree and reserve plantings and landscape treatments around the houses.
42. The visual effects which will arise from a change in the number of vegetative and built elements in the landscape are significant, but not avoidable, if the Site is to contribute to the on-going growth of Rangiora. The change will contribute to a high quality amenity and quality of environment and one that will be entirely consistent with and supportive of the rural lifestyle residential development that has successfully established on the Site.

Well-functioning urban environments
43. The Site adjoins the existing built up urban area of Rangiora. Immediately to the east are existing or developing residential areas.
44. The conversion of the Site from present rural lifestyle uses to low density, high quality residential will continue a pattern of outward expansion of Rangiora. Such a change may not be consistent with the PWDP's identification of a Future Development Overlay for west Rangiora only as far west as Lehmans Road, but on the ground it will look and integrate as part of the urban fabric.
45. It will provide some replacement lower density living areas for the existing LLR zones at north west Rangiora – but at much more appropriate higher density that the LLR D1 standard which is 1-2 hh/ha. There are two such areas, shown on the planning maps below. River Road has an 'urban overlay' and is intended to be intensified to urban densities. The land on the opposite (east) side of Lehmans Road is a 'legacy' rural residential zoning which applies under the Operative District Plan. The landowners have developed the adjoining residential subdivision and wish to develop the land for full urban residential development. Services are in place to support this. The constraint to date has been Map A of the CRPS which does not include the land as a Greenfield Priority Area or Future Development Area, GR zoning of this land is consistent with the NPS-UD.

Figure 9: PWDP as notified – LLRZs shown in light grey. Diagonal stripes – urban growth overlay.
Site outlined in red.
46. Rangiora is growing apace. It is attracting significant interest from new home buyers as people respond to the significant investment in upgraded transport links (Northern Corridor and public transport) and a growing economic base for employment within the District and the City.
47. Rangiora has excellent connectivity to the City, both via the new Northern Corridor, and a nascent cycleway link into the City. There is a very regular bus service every half hour.(the No 1 Blue Line) The standard trip takes 70 minutes, and there is a twice daily weekday morning express service from Rangiora, and seven times weekday express out to Rangiora all via Kaiapoi.
48. The Site will step out the western edge of Rangiora, but as it exists in a peri-urban form now, such a change does not alter how the Site interacts with Rangiora as a whole. It is in many ways a functional part of urban Rangiora now; it's only the Zone boundaries and policy framework that create the sense of it not being part of Rangiora.
49. The Site is convenient to the Rakihura/ Ashley recreation trails, the racecourse, Arlington Park, and the airfield. The town centre is easily accessible.
50. The following assessment of the criteria in the NPS-UD for determining a well-functioning urban environment shows that the proposed rezoning will deliver urban, housing and residential outcomes that meet those criteria. There will be a variety of homes enabled by generous lot sizes. The Site is well-positioned, building as it does on an existing township well-serviced by public transport and cycling options, to provide good accessibility to jobs, community services, and open spaces, as well as mitigating climate change impacts and future natural hazards by being not near the coast and well removed from major rivers.

NPS-UD Policy 1

Planning decisions contribute to well functioning urban environments, which are urban environments that, as a minimum:	**Assessment**

(a) have or enable a variety of homes that: (i) meet the needs, in terms of type, price, and location, of different households; and (ii) enable Māori to express their cultural traditions and norms;	The proposal is to have larger lots supporting predominantly standalone dwellings and associated accessory buildings (including generous sized garaging) in an open landscaped garden setting. This will fill a gap in the range of housing typologies available at Rangiora and contribute to a better functioning urban environment overall at Rangiora. It is not necessary for each individual rezoning proposal to have a wide range of housing typologies, and in some circumstances this may not be appropriate. The rezoning will deliver a premier high amenity urban subdivision with generous sized lots which will complement existing and planned higher density residential development at west Rangiora. There is scope with the relief sought for a mix of residential densities. The appropriateness of this can be considered at the master planning/ODP stage. The Site has the potential to create a unique urban environment in Rangiora. It can follow the example of Palmview based on a lake or Kaiapoi Likes providing a niche housing option in Rangiora and the District meeting a need for residential land not constrained to GRZ standards.
(b) N/A business sectors	
(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and	The Site has access to a collector road and a strategic road providing easy access to key community amenities and facilities. The town is served by a public bus route to the city, and a cycle trail connecting to Kaiapoi and the City. The new West Rangiora Development Area adjoins the Site to the south. The Site will become closer to Rangiora public transport routes as they extend out to service this new growth area over time. The Site is in walking distance to Arlington Park and the Rakahuri/Ashley which contains abundant recreations pace. It is easily accessible to the town centre and within walking distance to the Huntingdon Drive local centre.
(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and	The demand for housing and land in Rangiora is largely ahead of the planning means to respond. This proposal will “top up” the land presently set aside in the PWDP and provide a useful buffer to demand. The Site owners have been keen to release this land for more intense development for some time; there is no prospect of land banking.
(e) support reductions in greenhouse gas emissions; and	The Site has significant advantages in being easily accessible to the town centre and reserves, community facilities and schools. The proposal retains a consolidated form to Rangiora with good connectivity and linkages to recreation space and commercial centres reducing the need for car travel.
(f) are resilient to the likely current and	The Site is within the area of influence of a major river but the non-urban flood assessment maps do not show extensive flooding likely at the Site.

future effects of climate change	Being inland it is not at risk from climate change induced extreme natural hazard events like sea level rise. or river flooding.

Effects on ecosystems and habitats

51. The Site is currently used for a mix of low intensity (grazing) farming, and lifestyle purposes. Shelter belts and utility buildings have been established

52. The Site has been identified in the PWDP with two ecological overlays (the PWDP ecological overlay – Plains and Low Plains Ecological District). They are a district-wide overlays and no specific ecological values have been identified in the Proposed Waimakariri District Plan. These overlays seek primarily to retain indigenous vegetation. The PWDP identifies SASM 025 nearby the Site. That is a Site and Area of Significance to Maori and in SASM - Schedule 1 is identified as *being River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species.*

Effects on natural and physical resources

53. The Site drains in a SE direction towards the newly developing residential area.

54. There will be a degree of site disturbance as part of creating the roading network, and reserves, and as part of curtilage development on each lot.

55. The proposed use for residential activity inevitably leads to loss of some rural productive potential as land owner intentions are not about farming or productive use of the land, but lifestyle use and enjoyment. Built forms and hard surfaces become more dominant.

56. The Site comprises 4ha bocks now and these are not able to be used effectively for productive purposes other than for intensive productions based on tunnel housing and other supported production systems. None exist in the Site now.

57. The Site contains Class 2 and Class 3 soils as defined in the NZ Land Use Inventory (Landcare Research) Land Use Capability classes 1-3 **(Figure 10)**. Productive use of these soils other than for low level purposes i.e. grazing, is not feasible given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production).

Figure 10: Site soils: Site outlined in red; (Canterbury Maps)
Class 2 soils: bright green/Class 3 soils: light green;

Discharges of contaminants into the environment

58. There will be no discharges of contaminants into the environment. Wastewater will discharge to the Council's reticulated system.

59. Stormwater discharges will potentially be to ground given ground conditions or to an approved and consented stormwater management and treatment area which will meet all relevant Council standards.

Risks from natural hazards or hazardous installations

60. The PWDP planning maps show the Site as being within a Non-Urban Flood Assessment Area.

61. The District Plan maps do not identify high flood hazard areas or high coastal flood hazard areas, rather these are identified through the flood assessment certification process. This enables the most up-to-date technical information to be used. However, as a guide, areas that are potentially high hazard can be identified through the Waimakariri District Natural Hazards Interactive Viewer (NH - Introduction).

62. Rules that refer to a Flood Assessment Certificate require a certificate to be obtained from the District Council to determine compliance with the relevant rule. The alternative is to apply for resource consent as set out in the rule.

63. Rule NH-R2 states
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;

64. Assessment of flood risk and consequence can be undertaken at subdivision stage.

65. There will be no hazardous installations proposed on the Site.

Geotechnical assessment
66. The PWDP planning maps show the Site as being “Liquefaction damage is unlikely. Standard investigation procedure outlined in NZS3604 is appropriate”.

Contaminated land
67. A Preliminary Site Investigation can be carried out for the Site at subdivision stage.
68. An enquiry of ECAN has identified that two sites at the northern end of the Site potentially contain some contaminated land, which can be investigated further at subdivision stage **(Appendix 6)**. 315 Lehmans Road is an unverified HAIL site (previous use for clay target shooting) and 317 is registered as containing uninvestigated persistent pesticide bulk storage.

Servicing
69. Proposals for servicing the Site and the effects from such servicing in relation to domestic water supply, wastewater, stormwater, roading, and telecommunications will be required for any subdivision consent.

Economic effects
70. It is anticipated that urban development will generate positive economic effects, both from the investigation/development phase and for the longer run economic activity from householders participating in the local economy.

Climate Change effects
71. An assessment of the effects of the proposed rezoning on climate change is included as part of the assessment of a well-functioning urban environment above.
72. A well-functioning urban area that is designed and serviced in an integrated manner, applying sound urban design principles, will enable a reduction in greenhouse gas emissions compared to unplanned, ad hoc development that does not create compact urban forms located where the services and benefits of existing, established urban areas are not readily accessible.
73. There is a triangle of planning influence that can be brought to bear on reducing greenhouse gas emissions
a) Compact urban form minimising distances between homes and work/play options.
b) Proximity of homes to community facilities, services and amenities and business/work areas.
c) Design and provision of movement corridors and linkages that create opportunities other than for vehicles for getting around.
74. The Site of the proposed rezoning:
a) Helps in retaining a compact urban form to Rangiora.
b) Is easily accessible to the town centre and is located convenient to the recreation resources of the nearby Rakahuri/Ashley River, the airfield and racecourse and Arlington Park.
75. Rangiora has excellent connectivity to the City, both via the Northern Motorway, the new Northern Corridor, a cycle way link to Kaiapoi which is linked to the new north city cycle way along the Northern Corridor and a very regular bus service.

Positive effects
76. The proposed rezoning will provide for the continued growth of Rangiora by managing the development through an ODP. The proposal will provide a buffer to on-going high level demand for lots in Rangiora. It will cater for a specific housing need not found in GRZ Zoned land nor LLRZ land. The proposed rezoning is anticipating a form of development that is a much more efficient use of a qualifying site supporting a well-functioning urban area. It is a positive endorsement of Rangiora as a growth node in the District.
77. The benefits derived from a planned ODP approach include facilitating high levels of connectivity, creating community links to identified focal points. The Site is close to recreation facilities. A coordinated and integrated development will provide a distinctive environmental quality and point of difference to the development.
78. The Site adjoins existing and developing residential development on the western edge of Rangiora.
79. From a community well-being perspective, the provision of additional land for residential growth will continue to support the Council’s investment in community infrastructure by maintaining and facilitating growth rates, increasing the rating base and attracting development contributions.

STATUTORY PLANNING ASSESSMENT
80. Submissions must be assessed under the provisions of the RMA, including Part 2 and Section 32 (Requirements for Preparing Evaluation Reports).

National Policy Statements
National Policy Statement on Urban Development Capacity (NPS-UD)

81. The NPS–UD applies to this proposal as it is directed at Tier 1 urban environments, and Tier 1 local authorities which includes Waimakariri District as part of the Christchurch urban environment that is defined in Table 1 of the NPS, and additionally defined as:

any area of land (regardless of size, and irrespective of local authority or statistical boundaries) that: is, or is intended to be, predominantly urban in character; and is, or is intended to be, part of a housing and labour market of at least 10,000 people.

82. The NPS-UD recognises the national significance of:

a) Having well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future; and

b) Providing sufficient development capacity to meet the different needs of people and communities.

83. The NPS outcomes are to be achieved through objectives that address:

a) Planning decisions improving housing affordability by supporting competitive land and development markets.

b) Regional policy statements and district plans enabling more people to live in areas of urban environments near centres or areas with employment opportunities, area well serviced by public transport or a high demand for housing in the area.

c) Urban environments developing and changing over time in response to diverse and changing needs of people, communities and future generations.

d) Local authority decisions on urban development being integrated with infrastructure planning and are strategic over the medium term and long term.

e) Local authority decisions on urban development are responsive particularly for proposals supplying significant development capacity.

f) New Zealand's urban environments support reductions in greenhouse emissions and are resilient to current and future effects of climate change.

84. The key method to achieve these objectives is by development of a Future Development Strategy (FDS). This will set out how the Councils will provide for sufficient development capacity over the next 30 years to meet expected demand. There is no FDS for the greater Christchurch Urban Area that meets the requirements of the NPS-UD.

85. Work on development capacity completed for the NPS - UDC 2016 by the Greater Christchurch Partnership as an Update of the existing Urban Development Strategy (UDS) – Our Space 2019 confirmed what there was a shortage of feasible development capacity for future housing in Waimakariri District for the medium (next 10 years) and long term (10 to 30 years) periods. That assessment is now out of date as it does not address the requirements of the NPS-UD; and rates of take up of land have exceeded projected rates.

86. One of the key changes in the NPS-UD is that local authority decisions on urban development that affects urban environments are responsive, particularly to proposals that would supply significant additional capacity. It also amends the required methodology for housing and business capacity assessments.

87. The current CRPS does not meet the new NPS-UD requirement in relation to proposals for significant additional capacity. Regional councils are required to include criteria in the RPS to determine what plan changes will be treated for the purposes of Policy 8 as adding significantly to development capacity as soon as practicable. ECAN has yet to respond to this requirement.

88. The NPS-UD has immediate effect, so in the meantime, proposals such as this submission must be assessed in the context of the overall intent and purpose of the NPSUD as articulated in the NPS-UD objectives and policies. This includes that NZ has well-functioning environments; provides sufficient development capacity to meet the different needs of people and communities; planning decisions improve housing affordability to contributing to competitive house and land markets; and RMA plans enable more people to live near major employment areas, where there is existing or planned public transport, and where there is high demand for housing.

89. The NPS-UD is the higher order document and its requirements override those of lower order documents where there is a conflict, including regional and district RMA plans.

90. Key objectives and policies in the NPS-UD are assessed here:

NPS-UD Objective/Policy	**Assessment**
Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	The proposed development will further enable Rangiora to sustain itself as a well-functioning urban environment by consolidating the residential area close to the town centre, and provide residential development close to public transport links and existing community and commercial facilities including Huntingdon Drive local centre. The proposal provides choices in the Rangiora housing market and in doing so

Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.	supports housing affordability. Whilst the proposal is for a premier larger lot urban residential development, it is important that all sectors of the market are catered for. This will be more affordable than forcing those wanting large sections out to the much larger and very limited areas of LLR D1 development, or having to purchase 2-3 sections in a standard residential subdivision. There Site is in multiple ownership and the landowners are working together to achieve the rezoning. It will bring more competition into the market by bringing new entrants into the market.
Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply: the area is in or near a centre zone or other area with many employment opportunities the area is well-serviced by existing or planned public transport there is high demand for housing or for business land in the area, relative to other areas within the urban environment.	The CRPS is due for review in 2024 but in the meantime the existing CRPS is not in accordance with the NPS-UD 2020. The proposed rezoning is on the edge of the District's largest centre, which offers a wide range of community and business services, and employment opportunities. It is expected that a proportion of future residents will commute outside the township, but as the township and associated business areas e.g. at Southbrook, continue to grow, this is expected to become proportionally less. Rangiora is well serviced with public transport, there is scope for future mass transit PP, and there is a high demand for housing at Rangiora. The Site adjoins the new West Rangiora Development Area, to the south. Extensions of public transport to service this growth area will be readily accessible to the Site.
Objective 6: Local authority decisions on urban development that affect urban environments are: integrated with infrastructure planning and funding decisions; and strategic over the medium term and long term; and responsive, particularly in relation to proposals that would supply significant development capacity.	Whilst not currently identified as a future growth area in RMA documents, the Site is well placed at the township edge to be serviced by existing infrastructure. Some upgrades may be required, which will be investigated further with Council prior to the hearing. See Policy 8 below for commentary on proposals which supply significant development capacity
Objective 8: New Zealand's urban environments: support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change	The proposal adjoins the existing built up are of Rangiora, close to public transport links. Its excellent accessibility to Christchurch City, substantially enhanced with the new Northern Motorway extensions, means it is now highly accessible to these nearby major employment areas. Travel distances are relatively short, minimising vehicle miles and the potential for greenhouse gas emissions. There is a cycleway link from into Christchurch City, and regular bus services, including an express route. The Site is inland and not subject to natural hazard risks associated with sea level rise arising from climate change.
Policy 1 – Planning decisions for well-functioning urban environments	Assessed at para 41-50
	The proposed rezoning is anticipated to provide sections that will be available for the short term (up to 3 years) and into the medium term (3-10 years) if adopting a more conservative outlook.

Policy 2 - Sufficient development capacity Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.	The locational and amenity advantages of Rangiora also favour strong ongoing demand. The PWDP UFD-O1 Feasible Development Capacity for residential activities identifies the need for 6300 residential units in the period 2018-2028, and 7100 residential units 2028-2048. These numbers are derived from Chapter 6 CRPS Table 6.1. and are out of date. Data from the Council (November 2021) confirms that there are about 800 vacant lots in Rangiora. Building consents are at about 180/year. That means there is about 4 years vacant land supply. A lead in time of 3-5 years is needed to go from rezone to house build so the Council is facing an unnecessary squeeze on land availability. That will translate in to an upward shift in land and section prices as has been the case at Rolleston. The data suggests that the PWDP will be late to the party to ensure there is at least sufficient development capacity to meet expected demand for housing land over the short term, medium term, and long term. There is a looming, inevitable land supply issue so any proposal to add capacity will push the Council closer to meeting the requirements of the NPS-UD. The proposal is consistent with ensuring there is at least sufficient land supply for housing.
Policy 8 – Responsiveness to plan changes Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is: (a) unanticipated by RMA planning documents; or (b) out-of-sequence with planned land release	The proposed rezoning is not anticipated by RMA documents - it is not a Greenfield Priority or Future Development Area in the CRPS, or a New Development area in the PWDP. A responsive approach to the proposal is required as it meets the Policy 8 criteria for unanticipated zoning. It will contribution to well functioning urban environments and will add significant development capacity. There is no development capacity for the housing typology proposed – so any provision is significant in this context. The development will deliver appx 311 high amenity large lot residential sites at an average density of 1500m2. This will be higher if a mix of densities are proposed, which may be appropriate in some parts of the Site, dependent on master planning work to follow.

91. Adopting the submission to re-zone the land, and enable the proposed development on the submission Site will satisfy the objectives and policies of the NPS-UD.

Proposed National Policy Statement for Highly Productive Land (NPS-HPL)

92. The Government proposed in 2019 a NPS-HPL to prevent the loss of productive land and promote its sustainable management. The overall purpose of the proposed NPS-HPL is to improve the way highly-productive land is managed under the Resource Management Act 1991 (RMA) to:

a) Recognise the full range of values and benefits associated with its use for primary production
b) Maintain its availability for primary production for future generations
c) Protect it from inappropriate subdivision, use, and development.

93. The NPS-HPL is still a proposal and not intended to take effect until after Gazettal. At the date of this submission the NPS-HPL has no effect and no assessment of it is required for the purposes of this submission.

94. The Proposed NPS-HPL interim definition of HPL is land defined as Land Use Capability Class 1-3 soils. A portion of the Site contains Class 2 and 3 soils (see **Figure 10)**. Highly productive use of these soils is not realistic given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production). Its present use as lifestyle blocks, low level grazing and agistment is the more likely long run use of the Site if not rezoned.

95. Objective 3 of the Proposed NPS-HPL specifically refers to highly productive soils being protected by avoiding *"uncoordinated urban expansion on highly productive land that has not been subject to a strategic planning process"*.

The Site was assessed through a strategic planning process (WDDS 2018) and the RRS as a preferred site for LLRZ development, and rejected for a change in zoning on the basis that it may be required for long term urban growth of Rangiora.
96. It is therefore considered that this submission to re-zone the Site is largely in accordance with the Proposed NPS-HPL.

National Planning Standards

97. The National Planning standards prescribe various matters under the RMA so that there is consistency among planning documents most relevantly here in terms of appellations for zones, and the standards applying to these zones.
98. The proposed rezoning adopts the standard zone appellation, in this case LLRZ as contained in the PWDP.
99. The PWDP identifies plan standards for minimum and average net site areas for the respective zones. These are modified for the proposed rezoning as a higher density LLRZ.
100. The higher density LLR zoning is entirely consistent with the NPS purpose for the LLRZ as reproduced below. In this case, the principal constraint to more intensive development is the peri-urban location where a lower density transition to the rural environment is appropriate (particularly noting that the zone boundary is 'mid block' so there is no natural or physical buffer between rural and residential areas); the existing pattern of 4 ha lots with existing substantial homes and gardens; and the fact that the premier large lot subdivision proposed relies on consistency of housing quality and character to be deliver on this vision for the area.

Large lot residential zone

Areas used predominantly for residential activities and buildings such as detached houses on lots larger than those of the Low density residential and General residential zones, and where there are particular landscape characteristics, physical limitations or other constraints to more intensive development.

Low density residential zone

Areas used predominantly for residential activities and buildings consistent with a suburban scale and subdivision pattern, such as one to two storey houses with yards and landscaping, and other compatible activities.[2]

Canterbury Regional Policy Statement 2013 (CRPS)

101. Chapter 6 of the RPS *"provides a resource management framework for the recovery of Greater Christchurch, to enable and support recovery and rebuilding, including restoration and enhancement, for the area through to 2028. Recovery in Greater Christchurch is also supported by the provisions in Chapter 5 notated as 'Entire Region'. The provisions in the remainder of the RPS also apply.3"*
102. An assessment of the proposed rezoning against the relevant CRPS Objectives and Policies is set out in **Appendix 1**. This should be read in the context of the CRPS being overdue for review and that it does not provide a regional response to the NPS-UD. The
need to focus on earthquake recovery has now passed and so many of the directive provisions need to be given appropriate 'weight' in a new national policy environment with a focus on flexible, responsive panning approaches that better provide for people's needs and well-being.
103. That assessment shows that

a) The development proposal achieves the objectives for the location, design and function of new developments (Objective 5.2.1)

b) The traffic effects of the proposal are unlikely to give rise to adverse effects and so achieves CRPS objectives for the strategic land transport network (Policy 5.3.7)

c) The Site falls outside the FDAs shown on Map A of Chapter 6 and in that regard is inconsistent with RPS Policy 6.2.1 clauses 1 to 3.

1. identifies priority areas for urban development within Greater Christchurch;

2. identifies Key Activity Centres which provide a focus for high quality, and, where appropriate, mixed-use development that incorporates the principles of good urban design;

3. avoids urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS

d) The environmental effects assessment outlined above establish that the proposed development is consistent and will not give rise to any concerns with respect to all the matters listed in RPS Policy 6.2.1 clauses 4. to 11. These matters are:

6.2.1 Recovery framework

Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that:

1. As above;

2. As above;

3. As above;

4. protects outstanding natural features and landscapes including those within the Port Hills from inappropriate subdivision, use and development;

5. protects and enhances indigenous biodiversity and public space;
6. maintains or improves the quantity and quality of water in groundwater aquifers and surface waterbodies, and quality of ambient air;
7. maintains the character and amenity of rural areas and settlements;
8. protects people from unacceptable risk from natural hazards and the effects of sea-level rise;
9. integrates strategic and other infrastructure and services with land use development;
10. achieves development that does not adversely affect the efficient operation, use, development, appropriate upgrade, and future planning of strategic infrastructure and freight hubs;
11. optimises use of existing infrastructure; and
12. N/A

e) The proposed rezoning achieves policies relating to:
- Sustainability;
- Integration of transport infrastructure and land use;
- Urban design; and
- Biodiversity, natural hazards, landscape, soils, contaminated land.

104. In terms of the CRPS polices for rural residential developments (Policy 6.3.9) the proposal sits square with all policy matters other than being a location identified in an adopted Rural Residential Strategy; and being at a higher density than provided for under this policy (ie greater than 1-2 hh/ha). As such it has a majority of features entirely consistent with the policy.
105. The CRPS includes housing capacity targets as below

6.2.1a Targets for sufficient, feasible development capacity for housing [inserted in accordance with sections 55(2) and 55(A) of the Resource Management Act 1991, from the National Policy Statement on Urban Development Capacity 2016]
For the period 2018-2048, sufficient, feasible development capacity for housing is enabled in Greater Christchurch in accordance with Table 6.1.
Table 6.1 Targets for housing development capacity in Greater Christchurch, 2018-2048

106. These derive from Our Space, under the requirements of the then NPS-Urban Development Capacity 2016, since replaced by the NPS-UD 2020. The targets (known as bottomlines in the NPS-UD) are to be treated as 'minimums' not 'maximums'.
Policy 6.3.12
enables urban development in the Rangiora and Kaiapoi FDAs (new Development Areas in the PWDP) where needed to meet the medium term targets. This a 'minimum' allocation approach contrary to the NPS-UD. The NPS-UD favours over allocation, including in locations unanticipated by RMA plans, where it will add additional development capacity, can be integrated with infrastructure planning and funding, and will contribute to well functioning urban environments – as is the case the proposed Lehmans LLR D2 zone.
107. The proposed Lehmans LLR D2 zone is consistent with the CRPS except with respect to those parts of the CRPS which are out of step with and do not give effect to the higher order plan, the NPS-UD.

Proposed Waimakariri District Plan
108. An assessment of this proposal against the relevant PWDP Objectives and Policies for urban growth and development as notified on 17 September 2021 is set out in **Appendix 2.**
109. That assessment shows that the proposed rezoning is entirely consistent with the relevant objectives and policies, including as sought to be amended by this submission. Those amendments are to UFD-P3 Identification/location and extension of Large Lot Residential Zone areas; and LLRZ-O1 and LLRZ- P1-5 and reflect the intent and outcomes intended for the proposed LLRZ D2 zone, which is a higher density LLRZ zone than the PWDP LLRZ zone (renamed LLRZ D1 in this submission).

ASSESSMENT AGAINST OTHER PLANNING DOCUMENTS
Our Space 2018-2048 Greater Christchurch Settlement Update (2019)
110. Our Space is a non-statutory document prepared under the Local Government Act. It
"responds to the new Government Policy Statement on Land Transport, which has increased funding for mass public transit schemes, and meets the requirement of the National Policy Statement on Urban Development Capacity (NPS-UDC) 2016 to prepare a
future development strategy…. Specifically, it:
• sets out how targets for housing for the next 30 years will be met, accommodating an additional 150,000 people;
• identifies locations for housing growth, encouraging Central City and suburban centre living while providing for township growth in Rolleston, Rangiora and Kaiapoi;…

• *promotes a compact urban form, which provides for efficient transport and locates development in a manner that takes into account climate change and sea level rise.[4].*

..Underpinning this settlement pattern approach is the vision for a transformation of the transport network that fosters much greater public and active transport usage, and reduced reliance on the private vehicle.

111. Our Space acknowledges that this will require commitment from the Government to invest in the necessary improvements to our transport system, which could include investing in rapid transit services. To date, there has been no successful business case for improved public transportation, including not as a Covid 19 fast track infrastructure project.

112. The Our Space housing capacity targets (Table 3) and Future Development Areas are related to growth of urban areas.

113. Our Space, like the CRPS (and the Operative District Plan) are now out of date, as they do not reflect or give effect to the new requirements of the NPS-UD.

Waimakariri 2048 District Development Strategy (WDDS)

114. The preferred growth directions for Rangiora in the WDDS 2048 (2018) are outlined above (under 'Site') i.e. westwards to Lehmans Road, and otherwise eastwards. However, the Council in its decision on the RRS, recognized west of Lehmmans Road as a potential longer town urban growth area.

115. The WDDS Rangiora Snapshot (pp38-39) -when looking ahead to 2048 proposed that:

a) Rangiora remains the District's largest town
b) 30,000 – estimated population (2048)
c) 12,025 – estimated households
d) 5,025 - new households in Rangiora
e) Continues to accommodate one third of the District's residential growth
f) 167 – estimated annual building consents for new dwellings for the next 30 years
g) 423 hectares of additional feasible residential land required by 2048 (this includes capacity in remaining stages of existing residential developments as well as new greenfield areas inside and outside of the Infrastructure Boundary)
h) Future residential growth directions proposed to the east (predominantly) and west of the current town
i) Opportunities for intensification/regeneration to be identified
j) New growth directions take into account areas of unacceptable natural hazard risk and areas of significant environmental and cultural values
k) New growth areas to connect into existing sewer and water networks
l) Stormwater Levels of Service designed to meet increased performance requirements

116. At the 2018 Census Rangiora had a population of 17,841, and 7314 total dwellings (incl those unoccupied and under construction). Population projections for the District show an average annual change 2018-2020 of 1700 persons. If Rangiora continues to attract a third of all district growth as stated in the WDSS then Rangiora's population in 2021 will be around 18,900.

Mahaanui Iwi Management Plan

117. Part 1 of the PWDP in a section "Mana Whenua" sets out the position with respect to iwi and the review of the district Plan:

a) The District's territorial area sits within the takiwā (territory) of Ngāi Tūāhuriri which is one of eighteen Ngāi Tahu regional papatipu rūnanga, constituted under the ***Te Rūnanga o Ngāi Tahu Act 1996*** *to represent* ***mana whenua*** *interests.*

b) The preparation and change of a district plan must take into account relevant iwi documents. For the District, Ngāi Tahu has set out its resource management values, issues, objectives and policies within the Mahaanui Iwi Management Plan (2013).

c) The Mahaanui Iwi Management Plan identifies objectives, issues and policies for natural resource and environmental management for six pāpatipu rūnanga (including Te Ngāi Tūāhuriri Rūnanga). It seeks to ensure that the taonga and resources of Ngāi

Tahu mana whenua are recognised and protected in the decision-making of statutory agencies. The Mahaanui Iwi Management Plan contains a comprehensive suite of policies and objectives addressing the range of resource management matters of significance to tangata whenua. The District Council shall have regard to the Mahaanui Iwi Management Plan when preparing or changing the District Plan, to the extent its content has a bearing on resource management issues of the District.

118. The Mahaanui Iwi Management Plan (MIMP) 2013 was released on 1 March 2013.

119. The MIMP is a tool for tangata whenua to express their identity as manawhenua and their objectives as kaitiaki, to protect their taonga and resources, and their relationships with these. The MIMP seeks to ensure that these taonga and resources are recognised and protected in the decision-making of agencies with statutory responsibilities to tangata whenua. Importantly it is also a tool

that assists Papatipu Rūnanga representatives to articulate their values, issues and policy into statutory processes.
120. The MIMP includes both general objectives and policies about the management of land, air, and water, and also includes catchment specific objectives and policies.
121. Section 5.3 Wai Maori (pp77-98) contains an extensive discussion about tangata whenua rights and interests in freshwater. It provides a suite of Issues, Objectives and Policies for freshwater
122. Section 5.4 Papatuanuku (pp101-124) sets out the Ngai Tahu Subdivision and Development Guidelines that are to be read along-side objectives relating to:

a) Land use planning and management in the takiwā reflects the principle of Ki Uta Ki Tai. (from the mountains to the sea)

b) Rural and urban land use occurs in a manner that is consistent with land capability, the assimilative capacity of catchments and the limits and availability of water resources.

c) Inappropriate land use practices that have a significant and unacceptable effect on water quality and quantity are discontinued.

d) Ngāi Tahu has a prominent and influential role in urban planning and development.

e) Subdivision and development activities implement low impact, innovative and sustainable solutions to water, stormwater, waste and energy issues.

123. Section 5.5 Tane (pp127-137) includes objectives that focus on:
a) Regional policy, planning and decision making in the takiwā reflects the particular interest of Ngāi Tahu in indigenous biodiversity protection, and the importance of mahinga kai to Ngāi Tahu culture and traditions.
b) The customary right of Ngāi Tahu to engage in mahinga kai activity is recognised, protected and enhanced…
c) Customary use, and therefore mahinga kai, is given effect to as a first order priority for freshwater management in the takiwā.
124. Section 6.4 (pp213-224) addresses issues of particular significance to the lands and waters of the Waimakariri catchment within which the Site lies.
125. Relevant Objectives relating to urban development of land in that catchment include:

a) The natural "energy, vitality and life" of the Waimakariri River as a braided river is protected and restored.

b) The discharge of contaminants to the Waimakariri and its tributaries is eliminated.

c) Water quality and flows in the Waimakariri and its tributaries are improved to enable whānau and the wider community to have places they can go to swim and fish.

d) The mauri and mahinga kai values of the Waimakariri and its tributaries and associated springs, wetlands and lagoons are protected and restored; mō tātou, ā, mō kā uri ā muri ake nei.

126. A key issue relating to subdivision and development is that subdivision and development activities in the lower catchment have the potential to adversely affect Ngāi Tahu values such as waterways, mahinga kai and sites of significance (Issue Wai4).
127. The proposal provides for full urban reticulation of the three waters and is consistent with the objectives and policies contained in Chapters 5.3 and 5.4 of the MIMP. The proposal does not preclude individual land owners from installing rainwater collection and use from roof areas at the time of building development.
128. The proposal has been designed taking into consideration the potential effect of resultant subdivision and development on the rivers and streams that flow into the lowland rivers.
129. Overall it is considered that the proposal will not have adverse impact on the cultural values of iwi as set out within the MIMP.

SECTION 32 ASSESSMENT

130. A Section 32 assessment is contained in **Appendix 3.**
131. In summary, the PWDP zoning and associated rules (RLZ Zone with a minimum lot size for subdivision and a dwelling 4ha) do not meet the needs and aspirations of the current owners.
132. Strategic Council planning documents (specifically the WDDS) have a focus on only meeting urban growth demands within urban environments of existing towns. They favour intensification (15hh/ha) and a strict allocation of capacity by development areas. It is a control and command regime consistent with Map A of Chapter 6 of the CRPS but is out of step with the requirements of the NPS-UD which requires a more flexible, responsive approach, prohibits a hard fixed unmoveable urban/rural boundary.
133. This approach leaves little room for new proposals or proposals that do not sit square with the standard array of GRZ/medium density or SETZ (Settlement Zone). SETZ applies to some of the District's smaller settlements outside Greater Christchurch.
134. Neither LRZ nor Large Lot Residential (LLRZ) as notified in the PWDP is an efficient use of this block of land located as it is immediately adjoining the urban area of Rangiora, and in a location easily accessible to the town centre by active transport modes as well as car and several district reserves.
135. If this Site is not zoned for LLRZ D2 (minimum average lot size 1500m^2) use to enable residential re-development then it will drive pressure to re-zone elsewhere. That step potentially will not have the significant benefits to Rangiora long term in relation to enabling a well-functioning urban environment that enables people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future. Additionally re-zoning to LLRZ D2 will contribute to providing additional development capacity to meet the different needs of people and communities in a planned manner and

consistent with the NPS-UD.
136. The Site can readily be developed to reflect the principles of the Urban Design Protocol with values of character, context, and connectivity.
137. The Section 32 assessment concludes that the proposal to re-zone the Site from LRZ zone to LLRZ D2 Zone (average lot size 1500m$_2$) is the most appropriate method for achieving the objectives of the proposal, than the other alternatives considered.
138. Option 2 identified in the s 32 assessment is consistent with some PWDP policies notwithstanding that it does sit square with the strategic intentions signaled in the WDDS and the PWDP approach to providing for development capacity and urban development.
139. Option 2 identified in the s 32 assessment to re-zone the Site is the most appropriate given:

a) The proposals adopt the PWDP zones, development and activity standards with appropriate amendments. This ensures continuity of the District Plan anticipated environmental outcomes and urban amenity for Rangiora and adjoining residential areas;

b) Will be consistent with and give effect to many of the relevant PWDP objectives and policies;

c) It is a logical extension to the developed and developing residential land adjoining the Site while achieving a compact, efficient urban form that removes pressure on isolated rural land elsewhere around Rangiora.

d) It gives effect to the NPS-UD, specifically Objective 6 c) and Policy 8, delivering significant additional development capacity and contributing to a well functioning urban environment.

e) It is assumed that there will be capacity in the public utilities and the existing road network, including planned upgrades, to accommodate the traffic effects of the redevelopment;

f) The proposed Site specific ODP will provide certainty of the final form and disposition of the re-zoned area including its proposals for reserves, roading, future linkages for pedestrian and vehicular traffic.

140. The re-zoning proposal is considered to be appropriate to achieve the sustainable growth and development of Rangiora.
141. The economic, social and environmental benefits of the proposed rezoning outweigh any potential costs.
142. The overall efficiency and effectiveness of the proposed rezoning (Option 2) is high, in comparison to the alternative options set out in the s 32 Assessment which are low (Options One and Four) or low to moderate (Option Three).
143. The PWDP proposes to release land for development in the new Development Areas at Rangiora and Kaiaipoi through a novel and untested certification process that is not clearly derived from RMA statutory powers, nor Local Government Act 2002 (LGA) authority. This approach is not proposed for the LLR Overlay areas. As the proposed Lehmans Road LLR D2 zone proposed by this submission seeks large lot urban densities, it is anticipated that Council may favour the certification process if it accepts the proposed rezoning. This is opposed – rezoning to LLRZ D2 is sought.
144. Potential difficulties with the proposed certification process are identified and discussed in the Section 32 Assessment. (**Appendix 3)**. In summary, the process is hugely discretionary, does not provide conventional rights to an applicant (eg right of objection/appeal) meaning decisions cannot be challenged, and it is not apparent that the process will be appropriately documented with a transparent record of the decision-making within the certification process. Further uncertainty arises in the practicalities of how to negotiate and manage the staging, funding and building of key infrastructure across a range of Sites, and a risk that land supply is controlled by a limited number of large developers. It is a far less efficient and effective method for delivering land for housing than the Council rezoning the land in the PWDP.
145. The proposed rezoning is considered to be the most appropriate, efficient and effective means of achieving the purpose of the RMA.

CONSULTATION

146. The landowners and their consultants have submitted on the WRRS and the WDDS (**Appendix 4)**.
147. The submissions to re-zone as rural residential or identify the Site as suitable for LLRZ have been rejected as noted above. LLRZ but at higher densities as now proposed is considered to be a more efficient use of the land and better meets market demand. 5000m^2 sites provide more land is needed for a spacious home and garden.
148. The landowners have been consistent in their wish to find a zone and possible land uses better suited to their needs.

CONCLUSION

173 The submission seeks to rezone 58 ha of land adjoining Rangiora from Lifestyle Rural Zone (LRZ) to Large Lot Residential with a specific density standard (LLRZ D1), minimum average lot size 1500m^2.
149. The Site has a long history of rural lifestyle use. It is not significantly restricted by potential natural hazards especially flooding, nor does it have physical limitations for development for residential purposes as it is not liquefaction prone, and has no known geotechnical limitations but does contain an area of LUC 2 soils. It is near a site of significance to iwi (SASM – 025) being the Rakahuri/Ashley River The Site has access to a collector road and is near to a strategic road giving direct access to the town centre and a range of community amenities and facilities.
150. The Site immediately adjoins the urban area of Rangiora, and is well located to join in to Council utility services. It is well suited for conversion to residential use.
151. The Site is not identified within the westward growth direction for Rangiora in the District Development Strategy 2018 nor is

it part of the DEV-WR development area which adopts Lehmans Road as its western boundary. It is in a location that achieves coherent and compact urban form offering ease of access to business services, community facilities, reserves and the primary road network.
152. The proposed rezoning provides for a connected and high amenity residential living environment not presently available under the PWDP while avoiding and/or mitigating any potential adverse effects on the environment. It will provide for continuing high demand for a variety of high quality residential sections aimed at a particular segment of the housing market in an ideal location, easily accessible to the existing town centre services and facilities. It will broaden the range of housing available. As such, it is consistent with the NPS-UD including Objective 6c) and Policy 8, to be responsive to proposals which supply significant development capacity and contribute to a well functioning urban environment.
153. The use of this Site for residential purposes can be a sustainable and efficient use of land and infrastructure. The proposed rezoning better provides for the social, economic, environmental well-being of the landowners and the Rangiora community than continuation of the current low intensity lifestyle land use on 4ha blocks, or a conventional LLRZ residential use.
154. Any potential adverse effects of the implementation of the proposed rezoning can be assessed at subdivision stage but there has been no restriction on servicing the blocks to date. Capacity will need to be confirmed for infrastructure, power and road network. Any future subdivision of the Site will need to confirm water supply and wastewater treatment and disposal options.
155. Rezoning of the site to LLRZ zone is not inconsistent with the policies and objectives of the PWDP, but it is at odds with the dated CRPS approach to provision of urban growth and housing capacity for Greater Christchurch, to the extent that it is not within an FDA created by Change 1 to the CRPS and is not identified as an LLRZ site under the strategic RRS prepared by the Council.
156. As the proposal helps achieve the purpose of the RMA, and has been shown to be consistent with the relevant provisions of the NPS-UD, the submission can be accepted by Waimakariri District Council.

Original Submission

Summary Reasons for the Submission

The reasons for our submission are outlined below.
a) The preferred relief (**the proposed rezoning**) is both appropriate and necessary to achieve sustainable growth and development of Rangiora and the District and meet the requirements of the National Policy Statement for Urban Development 2020 (**NPS-UD**).
b) The Site identified in Figure 1 and at para 1 of the Preferred Relief above is a logical and preferred location that lends itself to a specific type of housing development not provided within the PWDP as a residential option adjoining but outside the existing urban areas. Nowhere is it possible to develop in a comprehensive, coordinated way a low density, high quality residential environment in the District's towns, the Rural Lifestyle Zone or Settlement Zone as a permitted activity.
c) The requirement for 12/15 hh/ha in GRZ zones (the majority of land in urban areas) drives development to modern scale relatively small urban lots best produced as a package across a significant land holding. The GRZ subdivision standards do not provide for the needs of people who seek a generous sized urban lot residential setting. This is a housing sector that is running against the planning tide of intensification but is, nonetheless, a legitimate form of housing in an appropriate setting. The barriers to such development in urban areas requires an appropriate setting/ location in the rural areas but close to or adjoining the urban areas and at a much lower density than is desired or appropriate (the PWDP LLRZ) to meet the housing needs for generous sized urban lot residential living..
d) The PWDP subdivision standards for LLRZ require lots that are very large for those whose primary interest in a rural setting is a form of residential living, not one that requires significant maintenance and management often involving animals or machinery at scale. Conversely, the GRZ subdivision standards do not provide for the needs of people who seek a large lot residential setting
e) The focus in the PWDP is on prescribing a limited range of residential options and tightly controlling and constraining housing choice within those options. Further urban growth is also tightly constrained and controlled around DEV areas around Rangiora and Kaiapoi but for a very specific form of residential development driven off density requirements that do not match the needs of all landowners.
f) The focus in most new District Plans, driven in part by the National Planning standards, is to simplify the range of zones, to standardize lot sizes, to supposedly create efficiency and certainty through ease of administration of the District Plans. This is done by constraining housing and land development choices by lot size, by location, by built standards and the disposition of built/open elements in a site. However, the National Planning standards do provide for large lot urban residential living, a residential living option which has not been taken up the PWDP (due most likely to the restrictive provisions of the CRPS which only prescribe one from of lower density residential living, at a density of 1-2 hh/ha).
g) This planning approach may be a standard approach to resource allocation but it does not provide a flexible, responsive

approach to innovative and new development options. The Government is creating policy settings that on one hand seek intensification in urban areas, while at the same time pushing away from a land allocation model of planning. The PWDP in striving to face both policy directions has a package of measures that are in fact a major barrier in terms or cost, timeframes and certainties for proposals that are not cut from the suite of housing and development options set out by the PWDP. The allocation of land in preferred development areas, it must be said, runs counter to the Government's push, and now its direction, to free up land for development, to encourage innovation in housing (presently with a focus of intensification) and to make available a range of responses to the need to meet the housing needs of people and communities set out in the NPS-UD.

h) While the weight of demand (and the planning response) is around affordable housing, around small lots and dense development that supports investment in public facilities and amenities such as public and active transport, reserves, and commercial services, there is always a wide spectrum of preferences at play in the housing market. The demand for high quality, generous houses set on generous sized parcels of land within high amenity settings is an important and no less relevant housing sector. There is a strong unmet demand, as confirmed by advice from Bayleys real estate (**Appendix 5**) for larger family homes with room for a pool or similar. Purchasers want to be close the amenities of Rangiora and within walking and cycling distance of local schools. They do not want the only available options – a 4 ha lifestyle block or 5000m^2 rural residential site at Mandeville or Ohoka.

i) Interestingly enough for a nation built on the so-called quarter acre paradise, recent policy and planning interest in housing and land development has now seemingly positioned the 1011m^2 section as a luxury item, as the antithesis of providing for community well-being and needs. It is as though the old quarter acre of itself acts against building a sense of community despite being able to be developed in a planned, structured, coordinated or integrated manner. Rather than being a frivolous discretionary item in land development
and housing choice, a well-planned, well located and properly serviced low density residential environment has much to offer urban environments. They can be tactically used to provide shape and edge to urban areas, they can provide a mass of amenity different from (and potentially complementary to), but no less legitimate in urban outcome terms, to conventional GRZ zoned land.

j) In many ways the approach of a district plan to the role and place of the old quarter acre is not dissimilar to the issues faced by comprehensive retirement villages when first proposed. The idea of dense, almost gated and self-contained communities, with multi storey buildings also did not sit well in many district plans. But now they are accepted as an important part of the urban fabric catering to a specific demographic and health demographic. Most plans enable them.

k) Provision for low density residential in an urban setting, or failing that likelihood, in an adjoining rural zone is a fundamental gap in the district plan.

l) The submission seeks to provide for another housing typology not provided in the PWDP and in a location with significant planning merit. The planning case was made out in a detailed submission to the proposed Rural Residential Strategy (**RRS**) for the land identified in this submission to be "reserved" for conventional Rural Residential zoning in the review of the District Plan. That submission was rejected in favour of a decision ascribing an unspecific strategic significance to Lehmans Road as the urban boundary; simply the decision was that rural residential development here would preclude this area as a future urban growth path, even though this was likely to be very long term as the Waimakariri District Development Strategy (WDDS 2018) for the period up to 2048, does not favour urban growth west of Lehmans Road.

Officer Recommendation

Continue to exclude the area west of Lehmans Road and the racecourse land at Rangiora as growth areas as these were originally considered but not included in the draft RRDS as they trigger the key preliminary criteria of: being on the direct edges of a main town outside of the Projected Infrastructure Boundary (PIB) thereby foreclosing more intensive long-term urban development, and…

Panel Recommendation

The panel accepted the officer recommendations to exclude areas on the fringes of Rangiora in the final RRDS due to these having the potential to foreclose more intensive long-term urban development of the town.

m) In light of the above decision on the Waimakariri Rural Residential Strategy, the proposal now is for a form of high amenity low density urban zoning, which whilst in demand is entirely absent from the PWDP. This will be a long term urban form of development. The proposal set out in the submission will achieve a compact, and efficient, urban form on the edge of Rangiora with excellent connectivity by multiple transport modes. It provides for continuous urban development by enabling a built form which can act as a strong zone or urban boundary.

n) The proposed rezoning will accommodate approximately 311 LLRZ lots1 at the proposed amended density standards for LLRZ D2 (average size 1500m^2). It will contribute to a well-functioning urban environment, meeting the NPS-UD Objective 6(c).

o) Any adverse effects on the environment arising from the proposed rezoning will be minimal, if any, and can be adequately mitigated. A high amenity master planned development is proposed.

p) Significant positive effects arise from the proposed rezoning. It will enable the short term housing demand at Rangiora to be met, and can deliver a housing typology for which there is demand, on lots that are not a burden to the landowners (which is the case for 4ha and the very limited areas of LLRZ D1 with a density of 1-2 hh/ha) and for which there is no provision in the PWDP. At present rates of land uptake there is about 4 years vacant land supply in Rangiora. Given it takes 3-5 years to bring land from zoned state to on the market as developed lots, there is some urgency in providing additional capacity. This proposal helps address an anticipated shortfall in residential zoned plan enabled land.
q) There is no additional cost to the Council in re-zoning the Site as there is expected to be capacity in the public utilities and the existing road network, including planned upgrades.
r) Amendments to PWDP objectives and policies may be necessary to provide for a higher density LLRZ, but of themselves will not act against those relating to Strategic Directions Urban Form and Development and Urban Growth. The PWDP approach to zones and
identification of future development land is already out of step with higher order Resource Management Act 1991 (RMA) statutory documents because they do not give effect to the NPS-UD (and are sought to be amended through this submission).
s) The alternatives of retaining Rural Lifestyle or Large Lot Residential zone across the entire Site are not an efficient use of land which immediately adjoins the urban area of Rangiora, and is highly accessible to the town centre by active transport modes as well as car.
t) The proposed rezoning is consistent with and the most appropriate, efficient and effective means of achieving the purpose of the RMA.

The Site
1. The Site is a 58ha block of land ('the Site') accessed from Lehman Road, Rangiora **(Figure 1)**. It is owned by the two submitters and 12 other landowners.

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1 Assumes 20% of land area taken for servicing including roading, reserves and stormwater management if required.

Figure 1: The site (outlined in blue (Google Earth)

2. The Site is surrounded by RLZ land that is used for a mix of lifestyle and conventional farming. To the NE is the Rangiora Eco Holiday Park, and beyond the Park is the Rangiora Racecourse about 300m away from the nearest lot and 1km from the centre of the Site. Land to the south east is GRZ and part of urban Rangiora with newly developing residential land west of West Belt. About 1.9 km to the NW is Rangiora Airfield. About 1km north of the most northern lot is the Ashley River.
3. The southern-most lot in the proposal with the Rangiora Vet Clinic faces, but does not have access to Rangiora-Oxford Road (State Highway 72). This arterial road provides the main road connection in to the centre of the town. The well-established Fernside Rural residential area is about 2.5km west from the junction of Lehmans and Rangiora-Oxford Roads.

Figure 2: the site is a broader context (Site marked red)

4. The Site is not identified as lying within a preferred growth direction for Rangiora in the Waimakariri 2048 District Development Strategy (2018) (**WDDS**) **(Figure 3)**. No land west of Lehmans Road is included in the West Rangiora Development Area (**DEV-WR**) in the PWDP.

Figure 3: Figure 11 WDDS

5. The Council reviewed its strategic approach to the location and provision of Rural Residential land (now zoned LLRZ in the PWDP) in the WDSS. It adopted the position that it would:

a) Explore tools such as cluster development to manage rural character

b) For rural residential development, adopt an approach that has a primary focus on creating new rural residential areas, with a secondary focus on enabling large lot intensification within existing rural residential areas where there is sufficient community support and servicing available

c) Review the Rural Residential Development Plan for the whole District (pg 21 WDDS).

6. Rangiora presently has a population of 17,841 (2018 Census). It grew steadily between 2006 and 2018. Growth of Rangiora since then has continued in step with the district growth which has increased 8.2% between 2018 and 2021 from 61,300 to 66,300 at an annual average of 2.8% from 2018 to 2020 (Statistics NZ Subnational population projections at 30 June 2021: provisional).

2006 (count)	2013 (count)	2018 (count)
12,165	15,069	17,841

Statistics NZ

Population projections at 30 June

PLANNING STATUS OF THE SITE

Chapter 6 of the Canterbury Regional Policy Statement

7. An assessment of the CRPS is set out in **Appendix 1** to this submission.
8. The Site is within the Greater Christchurch area.
9. It was not shown as a Greenfield Priority Area – Residential (GPA) on Map A of the Canterbury Regional Policy Statement (CRPS). The GPA terminates at Lehmans Road.
10. As a result of the Minister for the Environment's decision of 28 May 2021 on Change 1 to Chapter 6, an area largely south of Oxford Road and a finger of land to the north of Oxford Road was included as a Future Development Area (**FDA**) (**Figure 4** orange).

Figure 4: Map A Chapter 6 Regional Policy Statement Greenfield Priority areas
Site location identified with red circle (appx)

11. The FDAs are intended to accommodate the increased demand for new dwellings in that part of Waimakariri District within the Greater Christchurch Urban Area and to respond to the NPS-UD. They do not provide "plan enabled" land as they need to negotiate a rezoning process to confirm their status as land developable for housing and other urban purposes.
12. The proposal for a LLRZ zone with average lot sizes of 1500m2 is inconsistent with the policy approach of Chapter 6 for Greater Christchurch, in that if fits none of the residential living typologies provided for in Chapter 6 and is not in a location identified for urban or rural residential development. It sits 'between' the urban and rural residential densities provided for in the CRPS (minimum 10 hh/ha for urban in Waimakariri, and average 1-2 hh/ha for rural residential). The proposed density is appx. 6.66 hh/ha.
13. Notwithstanding, the proposal meets all the location and other criteria in CRPS Policy 6.3.9 for rural residential development. It is:

- Outside the CIAL noise contours
- Has some sites with restrictions from the take-off and landing vectors for Rangiora Airfield but not such as to impact its operational capacity.
- Is outside the groundwater protection zone
- Is not within the Waimakariri stop bank system
- Has no views of or to the Port Hills
- Has good access for emergency services
- Will not create reverse sensitivity issues with adjoining land uses; Rangiora Racecourse is 500m away.
- Free of significant natural hazards and is a flat site.
- Supports no significant natural values or ecological values.

• Contains no SASMs.
• Can be integrated into or consolidated with the existing urban area of west Rangiora.
• Contains no surface water bodies so there will be no adverse impacts on these.
• The development will be contingent on an ODP to provide integrated design for subdivision and land use, and provide for the long-term maintenance of a high quality high density rural residential character.
• The proposal is not intended as a staged development towards full urban; rather it is intended to provide a unique residential environment that can stand alone and contribute to the urban fabric of Rangiora like Palmview in east Rangiora, or as Kaiapoi Lakes does for Kaiapoi.

14. Overall, the proposal is not consistent with Chapter 6 but that is more a function of its original purpose when formulated in 2013. Notwithstanding that, the submission for a lower density residential focussed, high quality urban environment that attaches to an existing urban area and that promotes a coordinated pattern of development has planning merit.

Operative Waimakariri District Plan

15. The Site is zoned Rural in the Operative Plan. The minimum lot size for subdivision and a dwelling is 4 ha.

Proposed Waimakariri District Plan

16. The Site is zoned Rural Lifestyle Zone **(LRZ) (Figure 4).** The minimum lot size for subdivision and a dwelling in the LRZ is 4 ha.
17. Oxford Road is a strategic road and Lehmans Road is a collector road.

Figure 5: Proposed District Plan Zoning (site outlined in red)

18. The Site is also subject to, or potentially influenced by, a number of Overlays:
a) Rangiora Airfield Take Off Climb and Approach Obstacle Limitation Surface (**Figure 6**)
b) National Grid Transmission Lines (**Figure 6**)
c) Liquefaction: Liquefaction damage is unlikely (**Figure 6**)
d) Non-Urban Flood Assessment Area (**Figure 7**)
e) Geographic areas: Ecological Area – Plains
f) Ecological District – Low Plains

Figure 6: Rangiora Airfield Take-off and Approach vectors (blue dashed lines); Liquefaction damage unlikely (green)Transmission lines (green lines); Site outlined in red

Figure 7: Non-urban flood assessment & Waimakariri Flood Hazard maps
Blue – medium risk, green – low risk, white – very low

DEVELOPMENT PROPOSAL AND PROPOSED REZONING

19. Subdivision of the Site will create approximately 311 LLRZ D2 lots.
20. The key design drivers for the proposal are:
a) A high amenity premier residential zone with large houses on large sites – average 1500m^2, min 1000m$_2$ based on the St Kilda, Hamilton development concept (**Figure 8**).
b) LLRZ D2 standards would enable a lower density zone in the medium term e.g. 10 years to achieve a high quality consistent character subdivision. If developed as an integrated development subject to an ODP subdivision can be staged for to the proposal.
c) Creating strong connections with the immediate neighbourhood by providing a cohesive interconnected roading layout that picks up direct links to the eastern neighbourhood off Lehmans Road and the northern subdivision roading, and carries them into the Site.
d) Creating a high amenity and diverse residential neighbourhood by providing interfaces to roads, reserves and rural environments.
e) Respecting and building on local identity and character of Rangiora by retaining specific vegetation features from the Site, and anchoring the development into the wider landscape.

21. A development concept can provide for sound urban design by:
a) A hierarchy of movement corridors.
b) Prioritisation of walking and cycling.
c) A north-south alignment of street blocks to maximize solar access and provide for efficient use of lots.

d) Block perimeters being kept as small as practicable to aid permeability and higher public amenity.
e) Enabling a range of housing typologies set in high quality landscape and street setting with generous amenity plantings and curtilage.

Figure 8: St Kilda development images (Bayleys)

22. St Kilda, Cambridge is a premier development on the outskirts of Cambridge, centrally located and with easy access to the Waikato Expressway. It was originally part of a small dairy operation which was dissected by the Waikato Expressway, leaving a portion within the Cambridge Town boundary and the larger balance of the property of approximately 80 ha (which became St Kilda) on the Eastern side of the Expressway, left in the Rural Zone.
23. The initial development concepts were for a Rural Residential type development given the Expressway separation of the existing residential development on the Western side of the Cambridge Bypass, however this was not supported by Council and a new concept of larger residential sections of a 1600m² average size was developed and approved – see https://www.stkilda.nz/page/location/

EFFECTS ON THE ENVIRONMENT

Township growth and urban form

24. The Site immediately adjoins the western edge of urban Rangiora.
25. The WDDS indicated a general preference for the direction of urban growth of Rangiora to the east as a way of balancing up the residential areas around the town centre and some growth to the west.
26. The approach of the WDDS was to signal growth options to be confirmed in the District Plan Review:
The broad directions for greenfield residential growth for the District's main towns are set out in Figures 11 to 14. Further work will be carried out to identify and confirm the exact locations and extent of these residential growth areas, together with the intensification opportunities within existing urban areas. These will be enabled through the District Plan Review and other planning tools.
27. The Strategic Planning documents clearly signal active consideration of growth needs and growth directions. The options available to the Council were constrained by the approach of the CRPS as the District Plan has to give effect to the CRPS and cannot be
inconsistent with it. The CRPS took effect in 2013 and is overdue for review.
28. The CRPS tightly holds urban growth to the constraints of Map A Chapter 6 and the identified FDAs which although amended by Plan Change 1 in 2020 does not respond to the directions of the NPS-UD. In any event the approach is focused on the need for housing in full urban residential land, less on other residential development forms.
29. As such the Site falls outside the planning policy framework for urban growth. However, in terms of urban form and on the ground, there is considerable merit and logic to conversion of this existing LRZ land to a new high amenity residential form that can be integrated into the Rangiora urban fabric.
30. The proposal has the potential to anticipate the longer term growth path confirmed by the decisions on the RRS to protect the future growth option of more intensive urban development in this direction. It can set a pathway to further westward expansion on land
that holds few if any physical barriers to land development.
31. The proposal will contribute to the housing needs of Rangiora and in a form and location that does not undermine the long run urban form of Rangiora. Planned growth confirmed in the PWDP is already intended to extend westwards out to Lehmans Road and to keep the town edge squared up providing depth to future development and providing a rational basis for providing movement networks driven off the key roads such as Rangiora-Oxford Roads. The West Rangiora Future Development Area confirms this approach. The Site sits in the next block west of Lehmans Road so is not proposing a disjointed urban form, nor one that is not part of the long term thinking of urban form and growth for Rangiora.

32. A full residential zoning is proposed under LLRZ D2 and will provide a high quality street character, overall amenity and passive surveillance over the street, and will create the correct lighting standards, roading standard, fully formed footpaths and cycleways required for a high quality urban environment.

Neighbourhood and wider community effects

33. The Site is serviced by a collector road and is close to an arterial road. This provides for ease of access and safe and convenient movement to and from the Site. A planned development co-ordinated by an ODP can facilitate within the site

movement corridors and linkages through the Site to provide for walking and cycling.
34. A key positive neighbourhood and community effect will arise from the existing dwellings and their established gardens and plantings that will anchor new development and provide a point of reference for new dwellings. Development will not be on a bare site; it will take place in an existing established part-residential setting. The transition to a low density, high quality premier residential development will start from a favourable position and minimise the apparent extent and nature of the landscape change.
35. The Site is comparatively large (58.4 ha) and has the potential to support a variety of residential building typologies and this will contribute to a mix of households within the development and provide built form variety and interest in the streetscape. Whilst LLR D2 standards are proposed, it may be that part of the Site is suitable for other higher density forms of development, which would be within scope of the alternative relief, and could be considered as part of the master planning process required for preparation of an ODP (ahead of the hearing). The earlier stages of the St Kilda development were for large lot residential, with more clusters of townhouses included as later stages (and a retirement village). A retirement village is unlikely in this case, given the proximity of the Charles Upham Retirement Village.
36. Rangiora is well-positioned to accommodate and service the needs of a fast-growing resident population that will in turn support more business activity, schools, community facilities and community organisations.

Effects on tangata whenua values
37. The Proposed District Plan does not identify any Sites and Areas of Significance to Maori in the Site, but the nearby Rakahuri/Ashely River identified as SASM-025. This has been scheduled as being
River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species
38. The PWDP has Policy SASM-P8 which is relevant to pre-development processes:
Engagement with rūnanga
Te Ngāi Tūāhuriri Rūnanga and the District Council to encourage engagement with the Rūnanga priorto persons undertaking activities and/or applying for resource consent where the activity has thepotential to adversely affect identified sites or areas of Ngāi Tūāhuriri cultural significance. Where priorengagement with Te Ngāi Tūāhuriri Rūnanga h as not been undertaken by an applicant for an activitythat has the potential to adversely affect an identified site, the District Council will consult with the Rūnanga.
39. The Site is not listed as an archaeological site on the NZ Archaeological Site database.

Landscape and visual effects
40. Rural Lifestyle style development exists on the Site now (a series of 4 ha lots with a dwelling and associated accessory buildings on each). The landscape is dominated by shelter belts, utility buildings, significant trees and planted curtilages around dwellings many of which are well set back off the roads down RoWs.
41. An ODP will help to achieve an integrated, cohesive and coherent development The proposal will lead to a modification of the landscape of the Site from a predominantly lifestyle block landscape to a denser semi-urban environment dominated by residential building that will, in time, get the benefit of street tree and reserve plantings and landscape treatments around the houses.
42. The visual effects which will arise from a change in the number of vegetative and built elements in the landscape are significant, but not avoidable, if the Site is to contribute to the on-going growth of Rangiora. The change will contribute to a high quality amenity and quality of environment and one that will be entirely consistent with and supportive of the rural lifestyle residential development that has successfully established on the Site.

Well-functioning urban environments
43. The Site adjoins the existing built up urban area of Rangiora. Immediately to the east are existing or developing residential areas.
44. The conversion of the Site from present rural lifestyle uses to low density, high quality residential will continue a pattern of outward expansion of Rangiora. Such a change may not be consistent with the PWDP's identification of a Future Development Overlay for west Rangiora only as far west as Lehmans Road, but on the ground it will look and integrate as part of the urban fabric.
45. It will provide some replacement lower density living areas for the existing LLR zones at north west Rangiora – but at much more appropriate higher density that the LLR D1 standard which is 1-2 hh/ha. There are two such areas, shown on the planning maps below. River Road has an 'urban overlay' and is intended to be intensified to urban densities. The land on the opposite (east) side of Lehmans Road is a 'legacy' rural residential zoning which applies under the Operative District Plan. The landowners have developed the adjoining residential subdivision and wish to develop the land for full urban residential development. Services are in place to support this. The constraint to date has been Map A of the CRPS which does not include the land as a Greenfield Priority Area or Future Development Area, GR zoning of this land is consistent with the NPS-UD.

Figure 9: PWDP as notified – LLRZs shown in light grey. Diagonal stripes – urban growth overlay.
Site outlined in red.

46. Rangiora is growing apace. It is attracting significant interest from new home buyers as people respond to the significant investment in upgraded transport links (Northern Corridor and public transport) and a growing economic base for employment within the District and the City.

47. Rangiora has excellent connectivity to the City, both via the new Northern Corridor, and a nascent cycleway link into the City. There is a very regular bus service every half hour.(the No 1 Blue Line) The standard trip takes 70 minutes, and there is a twice daily weekday morning express service from Rangiora, and seven times weekday express out to Rangiora all via Kaiapoi.

48. The Site will step out the western edge of Rangiora, but as it exists in a peri-urban form now, such a change does not alter how the Site interacts with Rangiora as a whole. It is in many ways a functional part of urban Rangiora now; it's only the Zone boundaries and policy framework that create the sense of it not being part of Rangiora.

49. The Site is convenient to the Rakihura/ Ashley recreation trails, the racecourse, Arlington Park, and the airfield. The town centre is easily accessible.

50. The following assessment of the criteria in the NPS-UD for determining a well-functioning urban environment shows that the proposed rezoning will deliver urban, housing and residential outcomes that meet those criteria. There will be a variety of homes enabled by generous lot sizes. The Site is well-positioned, building as it does on an existing township well-serviced by public transport and cycling options, to provide good accessibility to jobs, community services, and open spaces, as well as mitigating climate change impacts and future natural hazards by being not near the coast and well removed from major rivers.

NPS-UD Policy 1

Planning decisions contribute to well functioning urban environments, which are urban environments that, as a minimum:	**Assessment**
(a) have or enable a variety of homes that: (i) meet the needs, in terms of type, price, and location, of different households; and (ii) enable Māori to express their cultural traditions and norms;	The proposal is to have larger lots supporting predominantly standalone dwellings and associated accessory buildings (including generous sized garaging) in an open landscaped garden setting. This will fill a gap in the range of housing typologies available at Rangiora and contribute to a better functioning urban environment overall at Rangiora. It is not necessary for each individual rezoning proposal to have a wide range of housing typologies, and in some circumstances this may not be appropriate. The rezoning will deliver a premier high amenity urban subdivision with generous sized lots which will complement existing and planned higher density residential development at west Rangiora. There is scope with the relief sought for a mix of residential densities. The appropriateness of this can be considered at the master planning/ODP stage. The Site has the potential to create a unique urban environment in Rangiora. It can follow the example of Palmview based on a lake or Kaiapoi Likes providing a niche housing option in Rangiora and the District meeting a need for residential land not constrained to GRZ standards.
(b) N/A business sectors	
(c) have good accessibility for all people between housing, jobs, community services,	The Site has access to a collector road and a strategic road providing easy access to key community amenities and facilities. The town is served by a public bus route to the city, and a cycle trail connecting to Kaiapoi and the City. The new West Rangiora Development Area adjoins the Site to the south. The Site will become closer to Rangiora public transport routes as they extend out to service this new growth area over time.

natural spaces, and open spaces, including by way of public or active transport; and	The Site is in walking distance to Arlington Park and the Rakahuri/Ashley which contains abundant recreations pace. It is easily accessible to the town centre and within walking distance to the Huntingdon Drive local centre.
(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and	The demand for housing and land in Rangiora is largely ahead of the planning means to respond. This proposal will "top up" the land presently set aside in the PWDP and provide a useful buffer to demand. The Site owners have been keen to release this land for more intense development for some time; there is no prospect of land banking.
(e) support reductions in greenhouse gas emissions; and	The Site has significant advantages in being easily accessible to the town centre and reserves, community facilities and schools. The proposal retains a consolidated form to Rangiora with good connectivity and linkages to recreation space and commercial centres reducing the need for car travel.
(f) are resilient to the likely current and future effects of climate change	The Site is within the area of influence of a major river but the non-urban flood assessment maps do not show extensive flooding likely at the Site. Being inland it is not at risk from climate change induced extreme natural hazard events like sea level rise. or river flooding.

Effects on ecosystems and habitats

51. The Site is currently used for a mix of low intensity (grazing) farming, and lifestyle purposes. Shelter belts and utility buildings have been established
52. The Site has been identified in the PWDP with two ecological overlays (the PWDP ecological overlay – Plains and Low Plains Ecological District). They are a district-wide overlays and no specific ecological values have been identified in the Proposed Waimakariri District Plan. These overlays seek primarily to retain indigenous vegetation. The PWDP identifies SASM 025 nearby the Site. That is a Site and Area of Significance to Maori and in SASM - Schedule 1 is identified as *being River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species.*

Effects on natural and physical resources

53. The Site drains in a SE direction towards the newly developing residential area.
54. There will be a degree of site disturbance as part of creating the roading network, and reserves, and as part of curtilage development on each lot.
55. The proposed use for residential activity inevitably leads to loss of some rural productive potential as land owner intentions are not about farming or productive use of the land, but lifestyle use and enjoyment. Built forms and hard surfaces become more dominant.
56. The Site comprises 4ha bocks now and these are not able to be used effectively for productive purposes other than for intensive productions based on tunnel housing and other supported production systems. None exist in the Site now.
57. The Site contains Class 2 and Class 3 soils as defined in the NZ Land Use Inventory (Landcare Research) Land Use Capability classes 1-3 **(Figure 10)**. Productive use of these soils other than for low level purposes i.e. grazing, is not feasible given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production).

Figure 10: Site soils: Site outlined in red; (Canterbury Maps)
Class 2 soils: bright green/Class 3 soils: light green;

Discharges of contaminants into the environment
58. There will be no discharges of contaminants into the environment. Wastewater will discharge to the Council's reticulated system.
59. Stormwater discharges will potentially be to ground given ground conditions or to an approved and consented stormwater management and treatment area which will meet all relevant Council standards.

Risks from natural hazards or hazardous installations
60. The PWDP planning maps show the Site as being within a Non-Urban Flood Assessment Area.
61. The District Plan maps do not identify high flood hazard areas or high coastal flood hazard areas, rather these are identified through the flood assessment certification process. This enables the most up-to-date technical information to be used. However, as a guide, areas that are potentially high hazard can be identified through the Waimakariri District Natural Hazards Interactive Viewer (NH - Introduction).
62. Rules that refer to a Flood Assessment Certificate require a certificate to be obtained from the District Council to determine compliance with the relevant rule. The alternative is to apply for resource consent as set out in the rule.

63. Rule NH-R2 states
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;

64. Assessment of flood risk and consequence can be undertaken at subdivision stage.
65. There will be no hazardous installations proposed on the Site.

Geotechnical assessment
66. The PWDP planning maps show the Site as being "Liquefaction damage is unlikely. Standard investigation procedure outlined in NZS3604 is appropriate".

Contaminated land
67. A Preliminary Site Investigation can be carried out for the Site at subdivision stage.
68. An enquiry of ECAN has identified that two sites at the northern end of the Site potentially contain some contaminated land, which can be investigated further at subdivision stage **(Appendix 6)**. 315 Lehmans Road is an unverified HAIL site (previous use for clay target shooting) and 317 is registered as containing uninvestigated persistent pesticide bulk storage.

Servicing
69. Proposals for servicing the Site and the effects from such servicing in relation to domestic water supply, wastewater, stormwater, roading, and telecommunications will be required for any subdivision consent.

Economic effects
70. It is anticipated that urban development will generate positive economic effects, both from the investigation/development phase and for the longer run economic activity from householders participating in the local economy.

Climate Change effects
71. An assessment of the effects of the proposed rezoning on climate change is included as part of the assessment of a well-functioning urban environment above.
72. A well-functioning urban area that is designed and serviced in an integrated manner, applying sound urban design principles, will enable a reduction in greenhouse gas emissions compared to unplanned, ad hoc development that does not create compact urban forms located where the services and benefits of existing, established urban areas are not readily accessible.
73. There is a triangle of planning influence that can be brought to bear on reducing greenhouse gas emissions
a) Compact urban form minimising distances between homes and work/play options.
b) Proximity of homes to community facilities, services and amenities and business/work areas.
c) Design and provision of movement corridors and linkages that create opportunities other than for vehicles for getting

around.
74. The Site of the proposed rezoning:
a) Helps in retaining a compact urban form to Rangiora.
b) Is easily accessible to the town centre and is located convenient to the recreation resources of the nearby Rakahuri/Ashley River, the airfield and racecourse and Arlington Park.
75. Rangiora has excellent connectivity to the City, both via the Northern Motorway, the new Northern Corridor, a cycle way link to Kaiapoi which is linked to the new north city cycle way along the Northern Corridor and a very regular bus service.

Positive effects
76. The proposed rezoning will provide for the continued growth of Rangiora by managing the development through an ODP. The proposal will provide a buffer to on-going high level demand for lots in Rangiora. It will cater for a specific housing need not found in GRZ Zoned land nor LLRZ land. The proposed rezoning is anticipating a form of development that is a much more efficient use of a qualifying site supporting a well-functioning urban area. It is a positive endorsement of Rangiora as a growth node in the District.
77. The benefits derived from a planned ODP approach include facilitating high levels of connectivity, creating community links to identified focal points. The Site is close to recreation facilities. A coordinated and integrated development will provide a distinctive environmental quality and point of difference to the development.
78. The Site adjoins existing and developing residential development on the western edge of Rangiora.
79. From a community well-being perspective, the provision of additional land for residential growth will continue to support the Council's investment in community infrastructure by maintaining and facilitating growth rates, increasing the rating base and attracting development contributions.

STATUTORY PLANNING ASSESSMENT
80. Submissions must be assessed under the provisions of the RMA, including Part 2 and Section 32 (Requirements for Preparing Evaluation Reports).

National Policy Statements
National Policy Statement on Urban Development Capacity (NPS-UD)

81. The NPS–UD applies to this proposal as it is directed at Tier 1 urban environments, and
Tier 1 local authorities which includes Waimakariri District as part of the Christchurch urban environment that is defined in Table 1 of the NPS, and additionally defined as:
any area of land (regardless of size, and irrespective of local authority or statistical boundaries)
that: is, or is intended to be, predominantly urban in character; and is, or is intended to be, part of
a housing and labour market of at least 10,000 people.
82. The NPS-UD recognises the national significance of:
a) Having well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future; and
b) Providing sufficient development capacity to meet the different needs of people and communities.
83. The NPS outcomes are to be achieved through objectives that address:
a) Planning decisions improving housing affordability by supporting competitive land and development markets.
b) Regional policy statements and district plans enabling more people to live in areas of urban environments near centres or areas with employment opportunities, area well serviced by public transport or a high demand for housing in the area.
c) Urban environments developing and changing over time in response to diverse and changing needs of people, communities and future generations.
d) Local authority decisions on urban development being integrated with infrastructure planning and are strategic over the medium term and long term.
e) Local authority decisions on urban development are responsive particularly for proposals supplying significant development capacity.
f) New Zealand's urban environments support reductions in greenhouse emissions and are resilient to current and future effects of climate change.
84. The key method to achieve these objectives is by development of a Future Development Strategy (FDS). This will set out how the Councils will provide for sufficient development capacity over the next 30 years to meet expected demand. There is no FDS for the greater Christchurch Urban Area that meets the requirements of the NPS-UD.
85. Work on development capacity completed for the NPS - UDC 2016 by the Greater Christchurch Partnership as an Update of the existing Urban Development Strategy (UDS) – Our Space 2019 confirmed what there was a shortage of feasible development capacity for future housing in Waimakariri District for the medium (next 10 years) and long term (10 to 30 years) periods. That assessment is now out of date as it does not address the requirements of the NPS-UD; and rates of take up of land have exceeded projected rates.

86. One of the key changes in the NPS-UD is that local authority decisions on urban development that affects urban environments are responsive, particularly to proposals that would supply significant additional capacity. It also amends the required methodology for housing and business capacity assessments.
87. The current CRPS does not meet the new NPS-UD requirement in relation to proposals for significant additional capacity. Regional councils are required to include criteria in the RPS to determine what plan changes will be treated for the purposes of Policy 8 as adding significantly to development capacity as soon as practicable. ECAN has yet to respond to this requirement.
88. The NPS-UD has immediate effect, so in the meantime, proposals such as this submission must be assessed in the context of the overall intent and purpose of the NPSUD as articulated in the NPS-UD objectives and policies. This includes that NZ has well-functioning environments; provides sufficient development capacity to meet the different needs of people and communities; planning decisions improve housing affordability to contributing to competitive house and land markets; and RMA plans enable more people to live near major employment areas, where there is existing or planned public transport, and where there is high demand for housing.
89. The NPS-UD is the higher order document and its requirements override those of lower order documents where there is a conflict, including regional and district RMA plans.
90. Key objectives and policies in the NPS-UD are assessed here:

NPS-UD Objective/Policy	**Assessment**
Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	The proposed development will further enable Rangiora to sustain itself as a well-functioning urban environment by consolidating the residential area close to the town centre, and provide residential development close to public transport links and existing community and commercial facilities including Huntingdon Drive local centre.
Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.	The proposal provides choices in the Rangiora housing market and in doing so supports housing affordability. Whilst the proposal is for a premier larger lot urban residential development, it is important that all sectors of the market are catered for. This will be more affordable than forcing those wanting large sections out to the much larger and very limited areas of LLR D1 development, or having to purchase 2-3 sections in a standard residential subdivision. There Site is in multiple ownership and the landowners are working together to achieve the rezoning. It will bring more competition into the market by bringing new entrants into the market.
Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply: the area is in or near a centre zone or other area with many employment opportunities the area is well-serviced by existing or planned public transport there is high demand for housing or for business land in the area, relative to other areas within the urban environment.	The CRPS is due for review in 2024 but in the meantime the existing CRPS is not in accordance with the NPS-UD 2020. The proposed rezoning is on the edge of the District's largest centre, which offers a wide range of community and business services, and employment opportunities. It is expected that a proportion of future residents will commute outside the township, but as the township and associated business areas e.g. at Southbrook, continue to grow, this is expected to become proportionally less. Rangiora is well serviced with public transport, there is scope for future mass transit PP, and there is a high demand for housing at Rangiora. The Site adjoins the new West Rangiora Development Area, to the south. Extensions of public transport to service this growth area will be readily accessible to the Site.
Objective 6: Local authority decisions on urban development that affect urban environments are: integrated with infrastructure planning and funding decisions; and strategic over the medium term and long term; and responsive,	Whilst not currently identified as a future growth area in RMA documents, the Site is well placed at the township edge to be serviced by existing infrastructure. Some upgrades may be required, which will be investigated further with Council prior to the hearing. See Policy 8 below for commentary on proposals which supply

particularly in relation to proposals that would supply significant development capacity.	significant development capacity
Objective 8: New Zealand's urban environments: support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change	The proposal adjoins the existing built up are of Rangiora, close to public transport links. Its excellent accessibility to Christchurch City, substantially enhanced with the new Northern Motorway extensions, means it is now highly accessible to these nearby major employment areas. Travel distances are relatively short, minimising vehicle miles and the potential for greenhouse gas emissions. There is a cycleway link from into Christchurch City, and regular bus services, including an express route. The Site is inland and not subject to natural hazard risks associated with sea level rise arising from climate change.
Policy 1 – Planning decisions for well-functioning urban environments	Assessed at para 41-50
Policy 2 - Sufficient development capacity Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.	The proposed rezoning is anticipated to provide sections that will be available for the short term (up to 3 years) and into the medium term (3-10 years) if adopting a more conservative outlook. The locational and amenity advantages of Rangiora also favour strong ongoing demand. The PWDP UFD-O1 Feasible Development Capacity for residential activities identifies the need for 6300 residential units in the period 2018-2028, and 7100 residential units 2028-2048. These numbers are derived from Chapter 6 CRPS Table 6.1. and are out of date. Data from the Council (November 2021) confirms that there are about 800 vacant lots in Rangiora. Building consents are at about 180/year. That means there is about 4 years vacant land supply. A lead in time of 3-5 years is needed to go from rezone to house build so the Council is facing an unnecessary squeeze on land availability. That will translate in to an upward shift in land and section prices as has been the case at Rolleston. The data suggests that the PWDP will be late to the party to ensure there is at least sufficient development capacity to meet expected demand for housing land over the short term, medium term, and long term. There is a looming, inevitable land supply issue so any proposal to add capacity will push the Council closer to meeting the requirements of the NPS-UD. The proposal is consistent with ensuring there is at least sufficient land supply for housing.
Policy 8 – Responsiveness to plan changes Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is: (a) unanticipated by RMA planning	The proposed rezoning is not anticipated by RMA documents - it is not a Greenfield Priority or Future Development Area in the CRPS, or a New Development area in the PWDP. A responsive approach to the proposal is required as it meets the Policy 8 criteria for unanticipated zoning. It will contribution to well functioning urban environments and will add significant development capacity. There is no development capacity for the housing typology proposed – so any provision is significant in this context. The development will deliver appx 311 high amenity large lot residential sites at an average density of 1500m2. This will be higher if a mix

documents; or
(b) out-of-sequence with planned land release

of densities are proposed, which may be appropriate in some parts of the Site, dependent on master planning work to follow.

91. Adopting the submission to re-zone the land, and enable the proposed development on the submission Site will satisfy the objectives and policies of the NPS-UD.

Proposed National Policy Statement for Highly Productive Land (NPS-HPL)

92. The Government proposed in 2019 a NPS-HPL to prevent the loss of productive land and promote its sustainable management. The overall purpose of the proposed NPS-HPL is to improve the way highly-productive land is managed under the Resource Management Act 1991 (RMA) to:

a) Recognise the full range of values and benefits associated with its use for primary production
b) Maintain its availability for primary production for future generations
c) Protect it from inappropriate subdivision, use, and development.

93. The NPS-HPL is still a proposal and not intended to take effect until after Gazettal. At the date of this submission the NPS-HPL has no effect and no assessment of it is required for the purposes of this submission.

94. The Proposed NPS-HPL interim definition of HPL is land defined as Land Use Capability Class 1-3 soils. A portion of the Site contains Class 2 and 3 soils (see **Figure 10)**. Highly productive use of these soils is not realistic given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production). Its present use as lifestyle blocks, low level grazing and agistment is the more likely long run use of the Site if not rezoned.

95. Objective 3 of the Proposed NPS-HPL specifically refers to highly productive soils being protected by avoiding *"uncoordinated urban expansion on highly productive land that has not been subject to a strategic planning process"*. The Site was assessed through a strategic planning process (WDDS 2018) and the RRS as a preferred site for LLRZ development, and rejected for a change in zoning on the basis that it may be required for long term urban growth of Rangiora.

96. It is therefore considered that this submission to re-zone the Site is largely in accordance with the Proposed NPS-HPL.

National Planning Standards

97. The National Planning standards prescribe various matters under the RMA so that there is consistency among planning documents most relevantly here in terms of appellations for zones, and the standards applying to these zones.

98. The proposed rezoning adopts the standard zone appellation, in this case LLRZ as contained in the PWDP.

99. The PWDP identifies plan standards for minimum and average net site areas for the respective zones. These are modified for the proposed rezoning as a higher density LLRZ.

100. The higher density LLR zoning is entirely consistent with the NPS purpose for the LLRZ as reproduced below. In this case, the principal constraint to more intensive development is the peri-urban location where a lower density transition to the rural environment is appropriate (particularly noting that the zone boundary is 'mid block' so there is no natural or physical buffer between rural and residential areas); the existing pattern of 4 ha lots with existing substantial homes and gardens; and the fact that the premier large lot subdivision proposed relies on consistency of housing quality and character to be deliver on this vision for the area.

Large lot residential zone

Areas used predominantly for residential activities and buildings such as detached houses on lots larger than those of the Low density residential and General residential zones, and where there are particular landscape characteristics, physical limitations or other constraints to more intensive development.

Low density residential zone

Areas used predominantly for residential activities and buildings consistent with a suburban scale and subdivision pattern, such as one to two storey houses with yards and landscaping, and other compatible activities.[2]

Canterbury Regional Policy Statement 2013 (CRPS)

101. Chapter 6 of the RPS *"provides a resource management framework for the recovery of Greater Christchurch, to enable and support recovery and rebuilding, including restoration and enhancement, for the area through to 2028. Recovery in Greater Christchurch is also supported by the provisions in Chapter 5 notated as 'Entire Region'. The provisions in the remainder of the RPS also apply.3"*

102. An assessment of the proposed rezoning against the relevant CRPS Objectives and Policies is set out in **Appendix 1**. This should be read in the context of the CRPS being overdue for review and that it does not provide a regional response to the NPS-

UD. The
need to focus on earthquake recovery has now passed and so many of the directive provisions need to be given appropriate 'weight' in a new national policy environment with a focus on flexible, responsive panning approaches that better provide for people's needs and well-being.

103. That assessment shows that

a) The development proposal achieves the objectives for the location, design and function of new developments (Objective 5.2.1)

b) The traffic effects of the proposal are unlikely to give rise to adverse effects and so achieves CRPS objectives for the strategic land transport network (Policy 5.3.7)

c) The Site falls outside the FDAs shown on Map A of Chapter 6 and in that regard is inconsistent with RPS Policy 6.2.1 clauses 1 to 3.

1. identifies priority areas for urban development within Greater Christchurch;

2. identifies Key Activity Centres which provide a focus for high quality, and, where appropriate, mixed-use development that incorporates the principles of good urban design;

3. avoids urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS

d) The environmental effects assessment outlined above establish that the proposed development is consistent and will not give rise to any concerns with respect to all the matters listed in RPS Policy 6.2.1 clauses 4. to 11. These matters are:

6.2.1 Recovery framework

Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that:

1. As above;

2. As above;

3. As above;

4. protects outstanding natural features and landscapes including those within the Port Hills from inappropriate subdivision, use and development;

5. protects and enhances indigenous biodiversity and public space;

6. maintains or improves the quantity and quality of water in groundwater aquifers and surface waterbodies, and quality of ambient air;

7. maintains the character and amenity of rural areas and settlements;

8. protects people from unacceptable risk from natural hazards and the effects of sea-level rise;

9. integrates strategic and other infrastructure and services with land use development;

10. achieves development that does not adversely affect the efficient operation, use, development, appropriate upgrade, and future planning of strategic infrastructure and freight hubs;

11. optimises use of existing infrastructure; and

12. N/A

e) The proposed rezoning achieves policies relating to:

- Sustainability;
- Integration of transport infrastructure and land use;
- Urban design; and
- Biodiversity, natural hazards, landscape, soils, contaminated land.

104. In terms of the CRPS polices for rural residential developments (Policy 6.3.9) the proposal sits square with all policy matters other than being a location identified in an adopted Rural Residential Strategy; and being at a higher density than provided for under this policy (ie greater than 1-2 hh/ha). As such it has a majority of features entirely consistent with the policy.

105. The CRPS includes housing capacity targets as below

6.2.1a Targets for sufficient, feasible development capacity for housing [inserted in accordance with sections 55(2) and 55(A) of the Resource Management Act 1991, from the National Policy Statement on Urban Development Capacity 2016]

For the period 2018-2048, sufficient, feasible development capacity for housing is enabled in Greater Christchurch in accordance with Table 6.1.

Table 6.1 Targets for housing development capacity in Greater Christchurch, 2018-2048

106. These derive from Our Space, under the requirements of the then NPS-Urban Development Capacity 2016, since replaced by the NPS-UD 2020. The targets (known as bottomlines in the NPS-UD) are to be treated as 'minimums' not 'maximums'.

Policy 6.3.12
enables urban development in the Rangiora and Kaiapoi FDAs (new Development Areas in the PWDP) where needed to meet the medium term targets. This a 'minimum' allocation approach contrary to the NPS-UD. The NPS-UD favours over allocation, including in locations unanticipated by RMA plans, where it will add additional development capacity, can be integrated with infrastructure planning and funding, and will contribute to well functioning urban environments – as is the case the proposed Lehmans LLR D2 zone.
107. The proposed Lehmans LLR D2 zone is consistent with the CRPS except with respect to those parts of the CRPS which are out of step with and do not give effect to the higher order plan, the NPS-UD.

Proposed Waimakariri District Plan
108. An assessment of this proposal against the relevant PWDP Objectives and Policies for urban growth and development as notified on 17 September 2021 is set out in **Appendix 2.**
109. That assessment shows that the proposed rezoning is entirely consistent with the relevant objectives and policies, including as sought to be amended by this submission. Those amendments are to UFD-P3 Identification/location and extension of Large Lot Residential Zone areas; and LLRZ-O1 and LLRZ- P1-5 and reflect the intent and outcomes intended for the proposed LLRZ D2 zone, which is a higher density LLRZ zone than the PWDP LLRZ zone (renamed LLRZ D1 in this submission).

ASSESSMENT AGAINST OTHER PLANNING DOCUMENTS
Our Space 2018-2048 Greater Christchurch Settlement Update (2019)
110. Our Space is a non-statutory document prepared under the Local Government Act. It
"responds to the new Government Policy Statement on Land Transport, which has increased funding for mass public transit schemes, and meets the requirement of the National Policy Statement on Urban Development Capacity (NPS-UDC) 2016 to prepare a
future development strategy…. Specifically, it:
• sets out how targets for housing for the next 30 years will be met, accommodating an additional 150,000 people;
• identifies locations for housing growth, encouraging Central City and suburban centre living while providing for township growth in Rolleston, Rangiora and Kaiapoi;…
• promotes a compact urban form, which provides for efficient transport and locates development in a manner that takes into account climate change and sea level rise.[4].

..Underpinning this settlement pattern approach is the vision for a transformation of the transport network that fosters much greater public and active transport usage, and reduced reliance on the private vehicle.
111. Our Space acknowledges that this will require commitment from the Government to invest in the necessary improvements to our transport system, which could include investing in rapid transit services. To date, there has been no successful business case for improved public transportation, including not as a Covid 19 fast track infrastructure project.
112. The Our Space housing capacity targets (Table 3) and Future Development Areas are related to growth of urban areas.
113. Our Space, like the CRPS (and the Operative District Plan) are now out of date, as they do not reflect or give effect to the new requirements of the NPS-UD.

Waimakariri 2048 District Development Strategy (WDDS)
114. The preferred growth directions for Rangiora in the WDDS 2048 (2018) are outlined above (under 'Site') i.e. westwards to Lehmans Road, and otherwise eastwards. However, the Council in its decision on the RRS, recognized west of Lehmmans Road as a potential longer town urban growth area.
115. The WDDS Rangiora Snapshot (pp38-39) -when looking ahead to 2048 proposed that:
a) Rangiora remains the District's largest town
b) 30,000 – estimated population (2048)
c) 12,025 – estimated households
d) 5,025 - new households in Rangiora
e) Continues to accommodate one third of the District's residential growth
f) 167 – estimated annual building consents for new dwellings for the next 30 years
g) 423 hectares of additional feasible residential land required by 2048 (this includes capacity in remaining stages of existing residential developments as well as new greenfield areas inside and outside of the Infrastructure Boundary)
h) Future residential growth directions proposed to the east (predominantly) and west of the current town
i) Opportunities for intensification/regeneration to be identified
j) New growth directions take into account areas of unacceptable natural hazard risk and areas of significant environmental and cultural values
k) New growth areas to connect into existing sewer and water networks

l) Stormwater Levels of Service designed to meet increased performance requirements

116. At the 2018 Census Rangiora had a population of 17,841, and 7314 total dwellings (incl those unoccupied and under construction). Population projections for the District show an average annual change 2018-2020 of 1700 persons. If Rangiora continues to attract a third of all district growth as stated in the WDSS then Rangiora's population in 2021 will be around 18,900.

Mahaanui Iwi Management Plan

117. Part 1 of the PWDP in a section "Mana Whenua" sets out the position with respect to iwi and the review of the district Plan:

a) The District's territorial area sits within the takiwā (territory) of Ngāi Tūāhuriri which is one of eighteen Ngāi Tahu regional papatipu rūnanga, constituted under the ***Te Rūnanga o Ngāi Tahu Act 1996*** *to represent* ***mana whenua*** *interests.*

b) The preparation and change of a district plan must take into account relevant iwi documents. For the District, Ngāi Tahu has set out its resource management values, issues, objectives and policies within the Mahaanui Iwi Management Plan (2013).

c) The Mahaanui Iwi Management Plan identifies objectives, issues and policies for natural resource and environmental management for six pāpatipu rūnanga (including Te Ngāi Tūāhuriri Rūnanga). It seeks to ensure that the taonga and resources of Ngāi

Tahu mana whenua are recognised and protected in the decision-making of statutory agencies. The Mahaanui Iwi Management Plan contains a comprehensive suite of policies and objectives addressing the range of resource management matters of significance to tangata whenua. The District Council shall have regard to the Mahaanui Iwi Management Plan when preparing or changing the District Plan, to the extent its content has a bearing on resource management issues of the District.

118. The Mahaanui Iwi Management Plan (MIMP) 2013 was released on 1 March 2013.

119. The MIMP is a tool for tangata whenua to express their identity as manawhenua and their objectives as kaitiaki, to protect their taonga and resources, and their relationships with these. The MIMP seeks to ensure that these taonga and resources are recognised and protected in the decision-making of agencies with statutory responsibilities to tangata whenua. Importantly it is also a tool that assists Papatipu Rūnanga representatives to articulate their values, issues and policy into statutory processes.

120. The MIMP includes both general objectives and policies about the management of land, air, and water, and also includes catchment specific objectives and policies.

121. Section 5.3 Wai Maori (pp77-98) contains an extensive discussion about tangata whenua rights and interests in freshwater. It provides a suite of Issues, Objectives and Policies for freshwater

122. Section 5.4 Papatuanuku (pp101-124) sets out the Ngai Tahu Subdivision and Development Guidelines that are to be read along-side objectives relating to:

a) Land use planning and management in the takiwā reflects the principle of Ki Uta Ki Tai. (from the mountains to the sea)

b) Rural and urban land use occurs in a manner that is consistent with land capability, the assimilative capacity of catchments and the limits and availability of water resources.

c) Inappropriate land use practices that have a significant and unacceptable effect on water quality and quantity are discontinued.

d) Ngāi Tahu has a prominent and influential role in urban planning and development.

e) Subdivision and development activities implement low impact, innovative and sustainable solutions to water, stormwater, waste and energy issues.

123. Section 5.5 Tane (pp127-137) includes objectives that focus on:

a) Regional policy, planning and decision making in the takiwā reflects the particular interest of Ngāi Tahu in indigenous biodiversity protection, and the importance of mahinga kai to Ngāi Tahu culture and traditions.

b) The customary right of Ngāi Tahu to engage in mahinga kai activity is recognised, protected and enhanced…

c) Customary use, and therefore mahinga kai, is given effect to as a first order priority for freshwater management in the takiwā.

124. Section 6.4 (pp213-224) addresses issues of particular significance to the lands and waters of the Waimakariri catchment within which the Site lies.

125. Relevant Objectives relating to urban development of land in that catchment include:

a) The natural "energy, vitality and life" of the Waimakariri River as a braided river is protected and restored.

b) The discharge of contaminants to the Waimakariri and its tributaries is eliminated.

c) Water quality and flows in the Waimakariri and its tributaries are improved to enable whānau and the wider community to have places they can go to swim and fish.

d) The mauri and mahinga kai values of the Waimakariri and its tributaries and associated springs, wetlands and lagoons are protected and restored; mō tātou, ā, mō kā uri ā muri ake nei.

126. A key issue relating to subdivision and development is that subdivision and development activities in the lower catchment

have the potential to adversely affect Ngāi Tahu values such as waterways, mahinga kai and sites of significance (Issue Wai4).
127. The proposal provides for full urban reticulation of the three waters and is consistent with the objectives and policies contained in Chapters 5.3 and 5.4 of the MIMP. The proposal does not preclude individual land owners from installing rainwater collection and use from roof areas at the time of building development.
128. The proposal has been designed taking into consideration the potential effect of resultant subdivision and development on the rivers and streams that flow into the lowland rivers.
129. Overall it is considered that the proposal will not have adverse impact on the cultural values of iwi as set out within the MIMP.

SECTION 32 ASSESSMENT

130. A Section 32 assessment is contained in **Appendix 3.**
131. In summary, the PWDP zoning and associated rules (RLZ Zone with a minimum lot size for subdivision and a dwelling 4ha) do not meet the needs and aspirations of the current owners.
132. Strategic Council planning documents (specifically the WDDS) have a focus on only meeting urban growth demands within urban environments of existing towns. They favour intensification (15hh/ha) and a strict allocation of capacity by development areas. It is a control and command regime consistent with Map A of Chapter 6 of the CRPS but is out of step with the requirements of the NPS-UD which requires a more flexible, responsive approach, prohibits a hard fixed unmoveable urban/rural boundary.
133. This approach leaves little room for new proposals or proposals that do not sit square with the standard array of GRZ/medium density or SETZ (Settlement Zone). SETZ applies to some of the District's smaller settlements outside Greater Christchurch.
134. Neither LRZ nor Large Lot Residential (LLRZ) as notified in the PWDP is an efficient use of this block of land located as it is immediately adjoining the urban area of Rangiora, and in a location easily accessible to the town centre by active transport modes as well as car and several district reserves.
135. If this Site is not zoned for LLRZ D2 (minimum average lot size 1500m^2) use to enable residential re-development then it will drive pressure to re-zone elsewhere. That step potentially will not have the significant benefits to Rangiora long term in relation to enabling a well-functioning urban environment that enables people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future. Additionally re-zoning to LLRZ D2 will contribute to providing additional development capacity to meet the different needs of people and communities in a planned manner and consistent with the NPS-UD.
136. The Site can readily be developed to reflect the principles of the Urban Design Protocol with values of character, context, and connectivity.
137. The Section 32 assessment concludes that the proposal to re-zone the Site from LRZ zone to LLRZ D2 Zone (average lot size 1500m_2) is the most appropriate method for achieving the objectives of the proposal, than the other alternatives considered.
138. Option 2 identified in the s 32 assessment is consistent with some PWDP policies notwithstanding that it does sit square with the strategic intentions signaled in the WDDS and the PWDP approach to providing for development capacity and urban development.
139. Option 2 identified in the s 32 assessment to re-zone the Site is the most appropriate given:
a) The proposals adopt the PWDP zones, development and activity standards with appropriate amendments. This ensures continuity of the District Plan anticipated environmental outcomes and urban amenity for Rangiora and adjoining residential areas;
b) Will be consistent with and give effect to many of the relevant PWDP objectives and policies;
c) It is a logical extension to the developed and developing residential land adjoining the Site while achieving a compact, efficient urban form that removes pressure on isolated rural land elsewhere around Rangiora.
d) It gives effect to the NPS-UD, specifically Objective 6 c) and Policy 8, delivering significant additional development capacity and contributing to a well functioning urban environment.
e) It is assumed that there will be capacity in the public utilities and the existing road network, including planned upgrades, to accommodate the traffic effects of the redevelopment;
f) The proposed Site specific ODP will provide certainty of the final form and disposition of the re-zoned area including its proposals for reserves, roading, future linkages for pedestrian and vehicular traffic.
140. The re-zoning proposal is considered to be appropriate to achieve the sustainable growth and development of Rangiora.
141. The economic, social and environmental benefits of the proposed rezoning outweigh any potential costs.
142. The overall efficiency and effectiveness of the proposed rezoning (Option 2) is high, in comparison to the alternative options set out in the s 32 Assessment which are low (Options One and Four) or low to moderate (Option Three).
143. The PWDP proposes to release land for development in the new Development Areas at Rangiora and Kaiapoi through a novel and untested certification process that is not clearly derived from RMA statutory powers, nor Local Government Act 2002 (LGA) authority. This approach is not proposed for the LLR Overlay areas. As the proposed Lehmans Road LLR D2 zone proposed by this submission seeks large lot urban densities, it is anticipated that Council may favour the certification process if it accepts the proposed rezoning. This is opposed – rezoning to LLRZ D2 is sought.
144. Potential difficulties with the proposed certification process are identified and discussed in the Section 32 Assessment.

(**Appendix 3)**. In summary, the process is hugely discretionary, does not provide conventional rights to an applicant (eg right of objection/appeal) meaning decisions cannot be challenged, and it is not apparent that the process will be appropriately documented with a transparent record of the decision-making within the certification process. Further uncertainty arises in the practicalities of how to negotiate and manage the staging, funding and building of key infrastructure across a range of Sites, and a risk that land supply is controlled by a limited number of large developers. It is a far less efficient and effective method for delivering land for housing than the Council rezoning the land in the PWDP.
145. The proposed rezoning is considered to be the most appropriate, efficient and effective means of achieving the purpose of the RMA.

CONSULTATION
146. The landowners and their consultants have submitted on the WRRS and the WDDS (**Appendix 4)**.
147. The submissions to re-zone as rural residential or identify the Site as suitable for LLRZ have been rejected as noted above. LLRZ but at higher densities as now proposed is considered to be a more efficient use of the land and better meets market demand. 5000m^2 sites provide more land is needed for a spacious home and garden.
148. The landowners have been consistent in their wish to find a zone and possible land uses better suited to their needs.

CONCLUSION

173 The submission seeks to rezone 58 ha of land adjoining Rangiora from Lifestyle Rural Zone (LRZ) to Large Lot Residential with a specific density standard (LLRZ D1), minimum average lot size 1500m^2.
149. The Site has a long history of rural lifestyle use. It is not significantly restricted by potential natural hazards especially flooding, nor does it have physical limitations for development for residential purposes as it is not liquefaction prone, and has no known geotechnical limitations but does contain an area of LUC 2 soils. It is near a site of significance to iwi (SASM – 025) being the Rakahuri/Ashley River The Site has access to a collector road and is near to a strategic road giving direct access to the town centre and a range of community amenities and facilities.
150. The Site immediately adjoins the urban area of Rangiora, and is well located to join in to Council utility services. It is well suited for conversion to residential use.
151. The Site is not identified within the westward growth direction for Rangiora in the District Development Strategy 2018 nor is it part of the DEV-WR development area which adopts Lehmans Road as its western boundary. It is in a location that achieves coherent and compact urban form offering ease of access to business services, community facilities, reserves and the primary road network.
152. The proposed rezoning provides for a connected and high amenity residential living environment not presently available under the PWDP while avoiding and/or mitigating any potential adverse effects on the environment. It will provide for continuing high demand for a variety of high quality residential sections aimed at a particular segment of the housing market in an ideal location, easily accessible to the existing town centre services and facilities. It will broaden the range of housing available. As such, it is consistent with the NPS-UD including Objective 6c) and Policy 8, to be responsive to proposals which supply significant development capacity and contribute to a well functioning urban environment.
153. The use of this Site for residential purposes can be a sustainable and efficient use of land and infrastructure. The proposed rezoning better provides for the social, economic, environmental well-being of the landowners and the Rangiora community than continuation of the current low intensity lifestyle land use on 4ha blocks, or a conventional LLRZ residential use.
154. Any potential adverse effects of the implementation of the proposed rezoning can be assessed at subdivision stage but there has been no restriction on servicing the blocks to date. Capacity will need to be confirmed for infrastructure, power and road network. Any future subdivision of the Site will need to confirm water supply and wastewater treatment and disposal options.
155. Rezoning of the site to LLRZ zone is not inconsistent with the policies and objectives of the PWDP, but it is at odds with the dated CRPS approach to provision of urban growth and housing capacity for Greater Christchurch, to the extent that it is not within an FDA created by Change 1 to the CRPS and is not identified as an LLRZ site under the strategic RRS prepared by the Council.
156. As the proposal helps achieve the purpose of the RMA, and has been shown to be consistent with the relevant provisions of the NPS-UD, the submission can be accepted by Waimakariri District Council.

Original Submission

Summary Reasons for the Submission

The reasons for our submission are outlined below.
a) The preferred relief (**the proposed rezoning**) is both appropriate and necessary to achieve sustainable growth and

development of Rangiora and the District and meet the requirements of the National Policy Statement for Urban Development 2020 (**NPS-UD**).

b) The Site identified in Figure 1 and at para 1 of the Preferred Relief above is a logical and preferred location that lends itself to a specific type of housing development not provided within the PWDP as a residential option adjoining but outside the existing urban areas. Nowhere is it possible to develop in a comprehensive, coordinated way a low density, high quality residential environment in the District's towns, the Rural Lifestyle Zone or Settlement Zone as a permitted activity.

c) The requirement for 12/15 hh/ha in GRZ zones (the majority of land in urban areas) drives development to modern scale relatively small urban lots best produced as a package across a significant land holding. The GRZ subdivision standards do not provide for the needs of people who seek a generous sized urban lot residential setting. This is a housing sector that is running against the planning tide of intensification but is, nonetheless, a legitimate form of housing in an appropriate setting. The barriers to such development in urban areas requires an appropriate setting/ location in the rural areas but close to or adjoining the urban areas and at a much lower density than is desired or appropriate (the PWDP LLRZ) to meet the housing needs for generous sized urban lot residential living..

d) The PWDP subdivision standards for LLRZ require lots that are very large for those whose primary interest in a rural setting is a form of residential living, not one that requires significant maintenance and management often involving animals or machinery at scale. Conversely, the GRZ subdivision standards do not provide for the needs of people who seek a large lot residential setting

e) The focus in the PWDP is on prescribing a limited range of residential options and tightly controlling and constraining housing choice within those options. Further urban growth is also tightly constrained and controlled around DEV areas around Rangiora and Kaiapoi but for a very specific form of residential development driven off density requirements that do not match the needs of all landowners.

f) The focus in most new District Plans, driven in part by the National Planning standards, is to simplify the range of zones, to standardize lot sizes, to supposedly create efficiency and certainty through ease of administration of the District Plans. This is done by constraining housing and land development choices by lot size, by location, by built standards and the disposition of built/open elements in a site. However, the National Planning standards do provide for large lot urban residential living, a residential living option which has not been taken up the PWDP (due most likely to the restrictive provisions of the CRPS which only prescribe one from of lower density residential living, at a density of 1-2 hh/ha).

g) This planning approach may be a standard approach to resource allocation but it does not provide a flexible, responsive approach to innovative and new development options. The Government is creating policy settings that on one hand seek intensification in urban areas, while at the same time pushing away from a land allocation model of planning. The PWDP in striving to face both policy directions has a package of measures that are in fact a major barrier in terms or cost, timeframes and certainties for proposals that are not cut from the suite of housing and development options set out by the PWDP. The allocation of land in preferred development areas, it must be said, runs counter to the Government's push, and now its direction, to free up land for development, to encourage innovation in housing (presently with a focus of intensification) and to make available a range of responses to the need to meet the housing needs of people and communities set out in the NPS-UD.

h) While the weight of demand (and the planning response) is around affordable housing, around small lots and dense development that supports investment in public facilities and amenities such as public and active transport, reserves, and commercial services, there is always a wide spectrum of preferences at play in the housing market. The demand for high quality, generous houses set on generous sized parcels of land within high amenity settings is an important and no less relevant housing sector. There is a strong unmet demand, as confirmed by advice from Bayleys real estate (**Appendix 5**) for larger family homes with room for a pool or similar. Purchasers want to be close the amenities of Rangiora and within walking and cycling distance of local schools. They do not want the only available options – a 4 ha lifestyle block or 5000m^2 rural residential site at Mandeville or Ohoka.

i) Interestingly enough for a nation built on the so-called quarter acre paradise, recent policy and planning interest in housing and land development has now seemingly positioned the 1011m^2 section as a luxury item, as the antithesis of providing for community well-being and needs. It is as though the old quarter acre of itself acts against building a sense of community despite being able to be developed in a planned, structured, coordinated or integrated manner. Rather than being a frivolous discretionary item in land development
and housing choice, a well-planned, well located and properly serviced low density residential environment has much to offer urban environments. They can be tactically used to provide shape and edge to urban areas, they can provide a mass of amenity different from (and potentially complementary to), but no less legitimate in urban outcome terms, to conventional GRZ zoned land.

j) In many ways the approach of a district plan to the role and place of the old quarter acre is not dissimilar to the issues faced by comprehensive retirement villages when first proposed. The idea of dense, almost gated and self-contained communities, with multi storey buildings also did not sit well in many district plans. But now they are accepted as an important part of the urban fabric catering to a specific demographic and health demographic. Most plans enable them.

k) Provision for low density residential in an urban setting, or failing that likelihood, in an adjoining rural zone is a fundamental gap in the district plan.

l) The submission seeks to provide for another housing typology not provided in the PWDP and in a location with significant planning merit. The planning case was made out in a detailed submission to the proposed Rural Residential Strategy (**RRS**) for

the land identified in this submission to be “reserved” for conventional Rural Residential zoning in the review of the District Plan. That submission was rejected in favour of a decision ascribing an unspecific strategic significance to Lehmans Road as the urban boundary; simply the decision was that rural residential development here would preclude this area as a future urban growth path, even though this was likely to be very long term as the Waimakariri District Development Strategy (WDDS 2018) for the period up to 2048, does not favour urban growth west of Lehmans Road.

Officer Recommendation

Continue to exclude the area west of Lehmans Road and the racecourse land at Rangiora as growth areas as these were originally considered but not included in the draft RRDS as they trigger the key preliminary criteria of: being on the direct edges of a main town outside of the Projected Infrastructure Boundary (PIB) thereby foreclosing more intensive long-term urban development, and…

Panel Recommendation

The panel accepted the officer recommendations to exclude areas on the fringes of Rangiora in the final RRDS due to these having the potential to foreclose more intensive long-term urban development of the town.

m) In light of the above decision on the Waimakariri Rural Residential Strategy, the proposal now is for a form of high amenity low density urban zoning, which whilst in demand is entirely absent from the PWDP. This will be a long term urban form of development. The proposal set out in the submission will achieve a compact, and efficient, urban form on the edge of Rangiora with excellent connectivity by multiple transport modes. It provides for continuous urban development by enabling a built form which can act as a strong zone or urban boundary.

n) The proposed rezoning will accommodate approximately 311 LLRZ lots1 at the proposed amended density standards for LLRZ D2 (average size 1500m^2). It will contribute to a well-functioning urban environment, meeting the NPS-UD Objective 6(c).

o) Any adverse effects on the environment arising from the proposed rezoning will be minimal, if any, and can be adequately mitigated. A high amenity master planned development is proposed.

p) Significant positive effects arise from the proposed rezoning. It will enable the short term housing demand at Rangiora to be met, and can deliver a housing typology for which there is demand, on lots that are not a burden to the landowners (which is the case for 4ha and the very limited areas of LLRZ D1 with a density of 1-2 hh/ha) and for which there is no provision in the PWDP. At present rates of land uptake there is about 4 years vacant land supply in Rangiora. Given it takes 3-5 years to bring land from zoned state to on the market as developed lots, there is some urgency in providing additional capacity. This proposal helps address an anticipated shortfall in residential zoned plan enabled land.

q) There is no additional cost to the Council in re-zoning the Site as there is expected to be capacity in the public utilities and the existing road network, including planned upgrades.

r) Amendments to PWDP objectives and policies may be necessary to provide for a higher density LLRZ, but of themselves will not act against those relating to Strategic Directions Urban Form and Development and Urban Growth. The PWDP approach to zones and
identification of future development land is already out of step with higher order Resource Management Act 1991 (RMA) statutory documents because they do not give effect to the NPS-UD (and are sought to be amended through this submission).

s) The alternatives of retaining Rural Lifestyle or Large Lot Residential zone across the entire Site are not an efficient use of land which immediately adjoins the urban area of Rangiora, and is highly accessible to the town centre by active transport modes as well as car.

t) The proposed rezoning is consistent with and the most appropriate, efficient and effective means of achieving the purpose of the RMA.

The Site

1. The Site is a 58ha block of land (‘the Site’) accessed from Lehman Road, Rangiora **(Figure 1)**. It is owned by the two submitters and 12 other landowners.

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1 Assumes 20% of land area taken for servicing including roading, reserves and stormwater management if required.

Figure 1: The site (outlined in blue (Google Earth)

2. The Site is surrounded by RLZ land that is used for a mix of lifestyle and conventional farming. To the NE is the Rangiora Eco Holiday Park, and beyond the Park is the Rangiora Racecourse about 300m away from the nearest lot and 1km from the centre of the Site. Land to the south east is GRZ and part of urban Rangiora with newly developing residential land west of West Belt. About 1.9 km to the NW is Rangiora Airfield. About 1km north of the most northern lot is the Ashley River.
3. The southern-most lot in the proposal with the Rangiora Vet Clinic faces, but does not have access to Rangiora-Oxford Road (State Highway 72). This arterial road provides the main road connection in to the centre of the town. The well-established Fernside Rural residential area is about 2.5km west from the junction of Lehmans and Rangiora-Oxford Roads.

Figure 2: the site is a broader context (Site marked red)

4. The Site is not identified as lying within a preferred growth direction for Rangiora in the Waimakariri 2048 District Development Strategy (2018) (**WDDS**) **(Figure 3)**. No land west of Lehmans Road is included in the West Rangiora Development Area (**DEV-WR**) in the PWDP.

Figure 3: Figure 11 WDDS

5. The Council reviewed its strategic approach to the location and provision of Rural Residential land (now zoned LLRZ in the PWDP) in the WDSS. It adopted the position that it would:

a) Explore tools such as cluster development to manage rural character

b) For rural residential development, adopt an approach that has a primary focus on creating new rural residential areas, with a secondary focus on enabling large lot intensification within existing rural residential areas where there is sufficient community support and servicing available

c) Review the Rural Residential Development Plan for the whole District (pg 21 WDDS).

6. Rangiora presently has a population of 17,841 (2018 Census). It grew steadily between 2006 and 2018. Growth of Rangiora since then has continued in step with the district growth which has increased 8.2% between 2018 and 2021 from 61,300 to 66,300 at an annual average of 2.8% from 2018 to 2020 (Statistics NZ Subnational population projections at 30 June 2021: provisional).

2006 (count)	2013 (count)	2018 (count)
12,165	15,069	17,841

Statistics NZ

Population projections at 30 June

PLANNING STATUS OF THE SITE

Chapter 6 of the Canterbury Regional Policy Statement

7. An assessment of the CRPS is set out in **Appendix 1** to this submission.
8. The Site is within the Greater Christchurch area.
9. It was not shown as a Greenfield Priority Area – Residential (GPA) on Map A of the Canterbury Regional Policy Statement (CRPS). The GPA terminates at Lehmans Road.
10. As a result of the Minister for the Environment's decision of 28 May 2021 on Change 1 to Chapter 6, an area largely south of Oxford Road and a finger of land to the north of Oxford Road was included as a Future Development Area (**FDA**) (**Figure 4** orange).

Figure 4: Map A Chapter 6 Regional Policy Statement Greenfield Priority areas
Site location identified with red circle (appx)

11. The FDAs are intended to accommodate the increased demand for new dwellings in that part of Waimakariri District within the Greater Christchurch Urban Area and to respond to the NPS-UD. They do not provide "plan enabled" land as they need to negotiate a rezoning process to confirm their status as land developable for housing and other urban purposes.
12. The proposal for a LLRZ zone with average lot sizes of 1500m2 is inconsistent with the policy approach of Chapter 6 for Greater Christchurch, in that if fits none of the residential living typologies provided for in Chapter 6 and is not in a location identified for urban or rural residential development. It sits 'between' the urban and rural residential densities provided for in the CRPS (minimum 10 hh/ha for urban in Waimakariri, and average 1-2 hh/ha for rural residential). The proposed density is appx. 6.66 hh/ha.
13. Notwithstanding, the proposal meets all the location and other criteria in CRPS Policy 6.3.9 for rural residential development. It is:

- Outside the CIAL noise contours
- Has some sites with restrictions from the take-off and landing vectors for Rangiora Airfield but not such as to impact its operational capacity.
- Is outside the groundwater protection zone
- Is not within the Waimakariri stop bank system
- Has no views of or to the Port Hills
- Has good access for emergency services
- Will not create reverse sensitivity issues with adjoining land uses; Rangiora Racecourse is 500m away.
- Free of significant natural hazards and is a flat site.
- Supports no significant natural values or ecological values.
- Contains no SASMs.
- Can be integrated into or consolidated with the existing urban area of west Rangiora.
- Contains no surface water bodies so there will be no adverse impacts on these.
- The development will be contingent on an ODP to provide integrated design for subdivision and land use, and provide for the long-term maintenance of a high quality high density rural residential character.
- The proposal is not intended as a staged development towards full urban; rather it is intended to provide a unique residential environment that can stand alone and contribute to the urban fabric of Rangiora like Palmview in east Rangiora, or as Kaiapoi Lakes does for Kaiapoi.

14. Overall, the proposal is not consistent with Chapter 6 but that is more a function of its original purpose when formulated in 2013. Notwithstanding that, the submission for a lower density residential focussed, high quality urban environment that attaches to an existing urban area and that promotes a coordinated pattern of development has planning merit.

Operative Waimakariri District Plan
15. The Site is zoned Rural in the Operative Plan. The minimum lot size for subdivision and a dwelling is 4 ha.
Proposed Waimakariri District Plan
16. The Site is zoned Rural Lifestyle Zone **(LRZ) (Figure 4).** The minimum lot size for subdivision and a dwelling in the LRZ is 4 ha.
17. Oxford Road is a strategic road and Lehmans Road is a collector road.

Figure 5: Proposed District Plan Zoning (site outlined in red)

18. The Site is also subject to, or potentially influenced by, a number of Overlays:
    a) Rangiora Airfield Take Off Climb and Approach Obstacle Limitation Surface (**Figure 6**)
    b) National Grid Transmission Lines (**Figure 6**)
    c) Liquefaction: Liquefaction damage is unlikely (**Figure 6**)
    d) Non-Urban Flood Assessment Area (**Figure 7**)
    e) Geographic areas: Ecological Area – Plains

f) Ecological District – Low Plains

Figure 6: Rangiora Airfield Take-off and Approach vectors (blue dashed lines); Liquefaction damage unlikely (green)Transmission lines (green lines); Site outlined in red

Figure 7: Non-urban flood assessment & Waimakariri Flood Hazard maps
Blue – medium risk, green – low risk, white – very low

DEVELOPMENT PROPOSAL AND PROPOSED REZONING

19. Subdivision of the Site will create approximately 311 LLRZ D2 lots.
20. The key design drivers for the proposal are:

a) A high amenity premier residential zone with large houses on large sites – average 1500m^2, min 1000m$_2$ based on the St Kilda, Hamilton development concept (**Figure 8**).

b) LLRZ D2 standards would enable a lower density zone in the medium term e.g. 10 years to achieve a high quality consistent character subdivision. If developed as an integrated development subject to an ODP subdivision can be staged for to the proposal.

c) Creating strong connections with the immediate neighbourhood by providing a cohesive interconnected roading layout that picks up direct links to the eastern neighbourhood off Lehmans Road and the northern subdivision roading, and carries them into the Site.

d) Creating a high amenity and diverse residential neighbourhood by providing interfaces to roads, reserves and rural environments.

e) Respecting and building on local identity and character of Rangiora by retaining specific vegetation features from the Site, and anchoring the development into the wider landscape.

21. A development concept can provide for sound urban design by:

a) A hierarchy of movement corridors.

b) Prioritisation of walking and cycling.

c) A north-south alignment of street blocks to maximize solar access and provide for efficient use of lots.

d) Block perimeters being kept as small as practicable to aid permeability and higher public amenity.

e) Enabling a range of housing typologies set in high quality landscape and street setting with generous amenity plantings and curtilage.

Figure 8: St Kilda development images (Bayleys)

22. St Kilda, Cambridge is a premier development on the outskirts of Cambridge, centrally located and with easy access to the Waikato Expressway. It was originally part of a small dairy operation which was dissected by the Waikato Expressway, leaving a portion within the Cambridge Town boundary and the larger balance of the property of approximately 80 ha (which became St Kilda) on the Eastern side of the Expressway, left in the Rural Zone.
23. The initial development concepts were for a Rural Residential type development given the Expressway separation of the existing residential development on the Western side of the Cambridge Bypass, however this was not supported by Council and a new concept of larger residential sections of a 1600m² average size was developed and approved – see https://www.stkilda.nz/page/location/

EFFECTS ON THE ENVIRONMENT

Township growth and urban form

24. The Site immediately adjoins the western edge of urban Rangiora.
25. The WDDS indicated a general preference for the direction of urban growth of Rangiora to the east as a way of balancing up the residential areas around the town centre and some growth to the west.
26. The approach of the WDDS was to signal growth options to be confirmed in the District Plan Review:

The broad directions for greenfield residential growth for the District's main towns are set out in Figures 11 to 14. Further work will be carried out to identify and confirm the exact locations and extent of these residential growth areas, together with the intensification opportunities within existing urban areas. These will be enabled through the District Plan Review and other planning tools.

27. The Strategic Planning documents clearly signal active consideration of growth needs and growth directions. The options available to the Council were constrained by the approach of the CRPS as the District Plan has to give effect to the CRPS and cannot be
inconsistent with it. The CRPS took effect in 2013 and is overdue for review.
28. The CRPS tightly holds urban growth to the constraints of Map A Chapter 6 and the identified FDAs which although amended by Plan Change 1 in 2020 does not respond to the directions of the NPS-UD. In any event the approach is focused on the need for housing in full urban residential land, less on other residential development forms.
29. As such the Site falls outside the planning policy framework for urban growth. However, in terms of urban form and on the ground, there is considerable merit and logic to conversion of this existing LRZ land to a new high amenity residential form that can be integrated into the Rangiora urban fabric.
30. The proposal has the potential to anticipate the longer term growth path confirmed by the decisions on the RRS to protect the future growth option of more intensive urban development in this direction. It can set a pathway to further westward expansion on land
that holds few if any physical barriers to land development.
31. The proposal will contribute to the housing needs of Rangiora and in a form and location that does not undermine the long run urban form of Rangiora. Planned growth confirmed in the PWDP is already intended to extend westwards out to Lehmans Road and to keep the town edge squared up providing depth to future development and providing a rational basis for providing movement networks driven off the key roads such as Rangiora-Oxford Roads. The West Rangiora Future Development Area confirms this approach. The Site sits in the next block west of Lehmans Road so is not proposing a disjointed urban form, nor one that is not part of the long term thinking of urban form and growth for Rangiora.

32. A full residential zoning is proposed under LLRZ D2 and will provide a high quality street character, overall amenity and passive surveillance over the street, and will create the correct lighting standards, roading standard, fully formed footpaths and cycleways required for a high quality urban environment.

Neighbourhood and wider community effects
33. The Site is serviced by a collector road and is close to an arterial road. This provides for ease of access and safe and convenient movement to and from the Site. A planned development co-ordinated by an ODP can facilitate within the site movement corridors and linkages through the Site to provide for walking and cycling.
34. A key positive neighbourhood and community effect will arise from the existing dwellings and their established gardens and plantings that will anchor new development and provide a point of reference for new dwellings. Development will not be on a bare site; it will take place in an existing established part-residential setting. The transition to a low density, high quality premier residential development will start from a favourable position and minimise the apparent extent and nature of the landscape change.
35. The Site is comparatively large (58.4 ha) and has the potential to support a variety of residential building typologies and this will contribute to a mix of households within the development and provide built form variety and interest in the streetscape. Whilst LLR D2 standards are proposed, it may be that part of the Site is suitable for other higher density forms of development, which would be within scope of the alternative relief, and could be considered as part of the master planning process required for preparation of an ODP (ahead of the hearing). The earlier stages of the St Kilda development were for large lot residential, with more clusters of townhouses included as later stages (and a retirement village). A retirement village is unlikely in this case, given the proximity of the Charles Upham Retirement Village.
36. Rangiora is well-positioned to accommodate and service the needs of a fast-growing resident population that will in turn support more business activity, schools, community facilities and community organisations.

Effects on tangata whenua values
37. The Proposed District Plan does not identify any Sites and Areas of Significance to Maori in the Site, but the nearby Rakahuri/Ashely River identified as SASM-025. This has been scheduled as being
River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species
38. The PWDP has Policy SASM-P8 which is relevant to pre-development processes:
Engagement with rūnanga
Te Ngāi Tūāhuriri Rūnanga and the District Council to encourage engagement with the Rūnanga priorto persons undertaking activities and/or applying for resource consent where the activity has thepotential to adversely affect identified sites or areas of Ngāi Tūāhuriri cultural significance. Where priorengagement with Te Ngāi Tūāhuriri Rūnanga h as not been undertaken by an applicant for an activitythat has the potential to adversely affect an identified site, the District Council will consult with the Rūnanga.
39. The Site is not listed as an archaeological site on the NZ Archaeological Site database.

Landscape and visual effects
40. Rural Lifestyle style development exists on the Site now (a series of 4 ha lots with a dwelling and associated accessory buildings on each). The landscape is dominated by shelter belts, utility buildings, significant trees and planted curtilages around

dwellings many of which are well set back off the roads down RoWs.
41. An ODP will help to achieve an integrated, cohesive and coherent development The proposal will lead to a modification of the landscape of the Site from a predominantly lifestyle block landscape to a denser semi-urban environment dominated by residential building that will, in time, get the benefit of street tree and reserve plantings and landscape treatments around the houses.
42. The visual effects which will arise from a change in the number of vegetative and built elements in the landscape are significant, but not avoidable, if the Site is to contribute to the on-going growth of Rangiora. The change will contribute to a high quality amenity and quality of environment and one that will be entirely consistent with and supportive of the rural lifestyle residential development that has successfully established on the Site.

Well-functioning urban environments
43. The Site adjoins the existing built up urban area of Rangiora. Immediately to the east are existing or developing residential areas.
44. The conversion of the Site from present rural lifestyle uses to low density, high quality residential will continue a pattern of outward expansion of Rangiora. Such a change may not be consistent with the PWDP's identification of a Future Development Overlay for west Rangiora only as far west as Lehmans Road, but on the ground it will look and integrate as part of the urban fabric.
45. It will provide some replacement lower density living areas for the existing LLR zones at north west Rangiora – but at much more appropriate higher density that the LLR D1 standard which is 1-2 hh/ha. There are two such areas, shown on the planning maps below. River Road has an 'urban overlay' and is intended to be intensified to urban densities. The land on the opposite (east) side of Lehmans Road is a 'legacy' rural residential zoning which applies under the Operative District Plan. The landowners have developed the adjoining residential subdivision and wish to develop the land for full urban residential development. Services are in place to support this. The constraint to date has been Map A of the CRPS which does not include the land as a Greenfield Priority Area or Future Development Area, GR zoning of this land is consistent with the NPS-UD.

Figure 9: PWDP as notified – LLRZs shown in light grey. Diagonal stripes – urban growth overlay.
Site outlined in red.
46. Rangiora is growing apace. It is attracting significant interest from new home buyers as people respond to the significant investment in upgraded transport links (Northern Corridor and public transport) and a growing economic base for employment within the District and the City.
47. Rangiora has excellent connectivity to the City, both via the new Northern Corridor, and a nascent cycleway link into the City. There is a very regular bus service every half hour.(the No 1 Blue Line) The standard trip takes 70 minutes, and there is a twice daily weekday morning express service from Rangiora, and seven times weekday express out to Rangiora all via Kaiapoi.
48. The Site will step out the western edge of Rangiora, but as it exists in a peri-urban form now, such a change does not alter how the Site interacts with Rangiora as a whole. It is in many ways a functional part of urban Rangiora now; it's only the Zone boundaries and policy framework that create the sense of it not being part of Rangiora.
49. The Site is convenient to the Rakihura/ Ashley recreation trails, the racecourse, Arlington Park, and the airfield. The town centre is easily accessible.
50. The following assessment of the criteria in the NPS-UD for determining a well-functioning urban environment shows that the proposed rezoning will deliver urban, housing and residential outcomes that meet those criteria. There will be a variety of homes enabled by generous lot sizes. The Site is well-positioned, building as it does on an existing township well-serviced by public transport and cycling options, to provide good accessibility to jobs, community services, and open spaces, as well as mitigating climate change impacts and future natural hazards by being not near the coast and well removed from major rivers.

NPS-UD Policy 1

Planning decisions contribute to well functioning urban environments, which are urban environments that, as a minimum:	**Assessment**

(a) have or enable a variety of homes that: (i) meet the needs, in terms of type, price, and location, of different households; and (ii) enable Māori to express their cultural traditions and norms;	The proposal is to have larger lots supporting predominantly standalone dwellings and associated accessory buildings (including generous sized garaging) in an open landscaped garden setting. This will fill a gap in the range of housing typologies available at Rangiora and contribute to a better functioning urban environment overall at Rangiora. It is not necessary for each individual rezoning proposal to have a wide range of housing typologies, and in some circumstances this may not be appropriate. The rezoning will deliver a premier high amenity urban subdivision with generous sized lots which will complement existing and planned higher density residential development at west Rangiora. There is scope with the relief sought for a mix of residential densities. The appropriateness of this can be considered at the master planning/ODP stage. The Site has the potential to create a unique urban environment in Rangiora. It can follow the example of Palmview based on a lake or Kaiapoi Likes providing a niche housing option in Rangiora and the District meeting a need for residential land not constrained to GRZ standards.
(b) N/A business sectors	
(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and	The Site has access to a collector road and a strategic road providing easy access to key community amenities and facilities. The town is served by a public bus route to the city, and a cycle trail connecting to Kaiapoi and the City. The new West Rangiora Development Area adjoins the Site to the south. The Site will become closer to Rangiora public transport routes as they extend out to service this new growth area over time. The Site is in walking distance to Arlington Park and the Rakahuri/Ashley which contains abundant recreations pace. It is easily accessible to the town centre and within walking distance to the Huntingdon Drive local centre.
(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and	The demand for housing and land in Rangiora is largely ahead of the planning means to respond. This proposal will “top up” the land presently set aside in the PWDP and provide a useful buffer to demand. The Site owners have been keen to release this land for more intense development for some time; there is no prospect of land banking.
(e) support reductions in greenhouse gas emissions; and	The Site has significant advantages in being easily accessible to the town centre and reserves, community facilities and schools. The proposal retains a consolidated form to Rangiora with good connectivity and linkages to recreation space and commercial centres reducing the need for car travel.
(f) are resilient to the likely current and	The Site is within the area of influence of a major river but the non-urban flood assessment maps do not show extensive flooding likely at the Site.

future effects of climate change	Being inland it is not at risk from climate change induced extreme natural hazard events like sea level rise. or river flooding.

Effects on ecosystems and habitats

51. The Site is currently used for a mix of low intensity (grazing) farming, and lifestyle purposes. Shelter belts and utility buildings have been established

52. The Site has been identified in the PWDP with two ecological overlays (the PWDP ecological overlay – Plains and Low Plains Ecological District). They are a district-wide overlays and no specific ecological values have been identified in the Proposed Waimakariri District Plan. These overlays seek primarily to retain indigenous vegetation. The PWDP identifies SASM 025 nearby the Site. That is a Site and Area of Significance to Maori and in SASM - Schedule 1 is identified as *being River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species.*

Effects on natural and physical resources

53. The Site drains in a SE direction towards the newly developing residential area.

54. There will be a degree of site disturbance as part of creating the roading network, and reserves, and as part of curtilage development on each lot.

55. The proposed use for residential activity inevitably leads to loss of some rural productive potential as land owner intentions are not about farming or productive use of the land, but lifestyle use and enjoyment. Built forms and hard surfaces become more dominant.

56. The Site comprises 4ha bocks now and these are not able to be used effectively for productive purposes other than for intensive productions based on tunnel housing and other supported production systems. None exist in the Site now.

57. The Site contains Class 2 and Class 3 soils as defined in the NZ Land Use Inventory (Landcare Research) Land Use Capability classes 1-3 **(Figure 10)**. Productive use of these soils other than for low level purposes i.e. grazing, is not feasible given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production).

Figure 10: Site soils: Site outlined in red; (Canterbury Maps)
Class 2 soils: bright green/Class 3 soils: light green;

Discharges of contaminants into the environment

58. There will be no discharges of contaminants into the environment. Wastewater will discharge to the Council's reticulated system.

59. Stormwater discharges will potentially be to ground given ground conditions or to an approved and consented stormwater management and treatment area which will meet all relevant Council standards.

Risks from natural hazards or hazardous installations

60. The PWDP planning maps show the Site as being within a Non-Urban Flood Assessment Area.

61. The District Plan maps do not identify high flood hazard areas or high coastal flood hazard areas, rather these are identified through the flood assessment certification process. This enables the most up-to-date technical information to be used. However, as a guide, areas that are potentially high hazard can be identified through the Waimakariri District Natural Hazards Interactive Viewer (NH - Introduction).

62. Rules that refer to a Flood Assessment Certificate require a certificate to be obtained from the District Council to determine compliance with the relevant rule. The alternative is to apply for resource consent as set out in the rule.

63. Rule NH-R2 states
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;

64. Assessment of flood risk and consequence can be undertaken at subdivision stage.

65. There will be no hazardous installations proposed on the Site.

Geotechnical assessment
66. The PWDP planning maps show the Site as being “Liquefaction damage is unlikely. Standard investigation procedure outlined in NZS3604 is appropriate”.

Contaminated land
67. A Preliminary Site Investigation can be carried out for the Site at subdivision stage.
68. An enquiry of ECAN has identified that two sites at the northern end of the Site potentially contain some contaminated land, which can be investigated further at subdivision stage **(Appendix 6)**. 315 Lehmans Road is an unverified HAIL site (previous use for clay target shooting) and 317 is registered as containing uninvestigated persistent pesticide bulk storage.

Servicing
69. Proposals for servicing the Site and the effects from such servicing in relation to domestic water supply, wastewater, stormwater, roading, and telecommunications will be required for any subdivision consent.

Economic effects
70. It is anticipated that urban development will generate positive economic effects, both from the investigation/development phase and for the longer run economic activity from householders participating in the local economy.

Climate Change effects
71. An assessment of the effects of the proposed rezoning on climate change is included as part of the assessment of a well-functioning urban environment above.
72. A well-functioning urban area that is designed and serviced in an integrated manner, applying sound urban design principles, will enable a reduction in greenhouse gas emissions compared to unplanned, ad hoc development that does not create compact urban forms located where the services and benefits of existing, established urban areas are not readily accessible.
73. There is a triangle of planning influence that can be brought to bear on reducing greenhouse gas emissions
a) Compact urban form minimising distances between homes and work/play options.
b) Proximity of homes to community facilities, services and amenities and business/work areas.
c) Design and provision of movement corridors and linkages that create opportunities other than for vehicles for getting around.
74. The Site of the proposed rezoning:
a) Helps in retaining a compact urban form to Rangiora.
b) Is easily accessible to the town centre and is located convenient to the recreation resources of the nearby Rakahuri/Ashley River, the airfield and racecourse and Arlington Park.
75. Rangiora has excellent connectivity to the City, both via the Northern Motorway, the new Northern Corridor, a cycle way link to Kaiapoi which is linked to the new north city cycle way along the Northern Corridor and a very regular bus service.

Positive effects
76. The proposed rezoning will provide for the continued growth of Rangiora by managing the development through an ODP. The proposal will provide a buffer to on-going high level demand for lots in Rangiora. It will cater for a specific housing need not found in GRZ Zoned land nor LLRZ land. The proposed rezoning is anticipating a form of development that is a much more efficient use of a qualifying site supporting a well-functioning urban area. It is a positive endorsement of Rangiora as a growth node in the District.
77. The benefits derived from a planned ODP approach include facilitating high levels of connectivity, creating community links to identified focal points. The Site is close to recreation facilities. A coordinated and integrated development will provide a distinctive environmental quality and point of difference to the development.
78. The Site adjoins existing and developing residential development on the western edge of Rangiora.
79. From a community well-being perspective, the provision of additional land for residential growth will continue to support the Council’s investment in community infrastructure by maintaining and facilitating growth rates, increasing the rating base and attracting development contributions.

STATUTORY PLANNING ASSESSMENT
80. Submissions must be assessed under the provisions of the RMA, including Part 2 and Section 32 (Requirements for Preparing Evaluation Reports).

National Policy Statements
National Policy Statement on Urban Development Capacity (NPS-UD)

81. The NPS–UD applies to this proposal as it is directed at Tier 1 urban environments, and Tier 1 local authorities which includes Waimakariri District as part of the Christchurch urban environment that is defined in Table 1 of the NPS, and additionally defined as:

any area of land (regardless of size, and irrespective of local authority or statistical boundaries) that: is, or is intended to be, predominantly urban in character; and is, or is intended to be, part of a housing and labour market of at least 10,000 people.

82. The NPS-UD recognises the national significance of:

a) Having well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future; and

b) Providing sufficient development capacity to meet the different needs of people and communities.

83. The NPS outcomes are to be achieved through objectives that address:

a) Planning decisions improving housing affordability by supporting competitive land and development markets.

b) Regional policy statements and district plans enabling more people to live in areas of urban environments near centres or areas with employment opportunities, area well serviced by public transport or a high demand for housing in the area.

c) Urban environments developing and changing over time in response to diverse and changing needs of people, communities and future generations.

d) Local authority decisions on urban development being integrated with infrastructure planning and are strategic over the medium term and long term.

e) Local authority decisions on urban development are responsive particularly for proposals supplying significant development capacity.

f) New Zealand's urban environments support reductions in greenhouse emissions and are resilient to current and future effects of climate change.

84. The key method to achieve these objectives is by development of a Future Development Strategy (FDS). This will set out how the Councils will provide for sufficient development capacity over the next 30 years to meet expected demand. There is no FDS for the greater Christchurch Urban Area that meets the requirements of the NPS-UD.

85. Work on development capacity completed for the NPS - UDC 2016 by the Greater Christchurch Partnership as an Update of the existing Urban Development Strategy (UDS) – Our Space 2019 confirmed what there was a shortage of feasible development capacity for future housing in Waimakariri District for the medium (next 10 years) and long term (10 to 30 years) periods. That assessment is now out of date as it does not address the requirements of the NPS-UD; and rates of take up of land have exceeded projected rates.

86. One of the key changes in the NPS-UD is that local authority decisions on urban development that affects urban environments are responsive, particularly to proposals that would supply significant additional capacity. It also amends the required methodology for housing and business capacity assessments.

87. The current CRPS does not meet the new NPS-UD requirement in relation to proposals for significant additional capacity. Regional councils are required to include criteria in the RPS to determine what plan changes will be treated for the purposes of Policy 8 as adding significantly to development capacity as soon as practicable. ECAN has yet to respond to this requirement.

88. The NPS-UD has immediate effect, so in the meantime, proposals such as this submission must be assessed in the context of the overall intent and purpose of the NPSUD as articulated in the NPS-UD objectives and policies. This includes that NZ has well-functioning environments; provides sufficient development capacity to meet the different needs of people and communities; planning decisions improve housing affordability to contributing to competitive house and land markets; and RMA plans enable more people to live near major employment areas, where there is existing or planned public transport, and where there is high demand for housing.

89. The NPS-UD is the higher order document and its requirements override those of lower order documents where there is a conflict, including regional and district RMA plans.

90. Key objectives and policies in the NPS-UD are assessed here:

NPS-UD Objective/Policy	**Assessment**
Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	The proposed development will further enable Rangiora to sustain itself as a well-functioning urban environment by consolidating the residential area close to the town centre, and provide residential development close to public transport links and existing community and commercial facilities including Huntingdon Drive local centre. The proposal provides choices in the Rangiora housing market and in doing so

Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.	supports housing affordability. Whilst the proposal is for a premier larger lot urban residential development, it is important that all sectors of the market are catered for. This will be more affordable than forcing those wanting large sections out to the much larger and very limited areas of LLR D1 development, or having to purchase 2-3 sections in a standard residential subdivision. There Site is in multiple ownership and the landowners are working together to achieve the rezoning. It will bring more competition into the market by bringing new entrants into the market.
Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply: the area is in or near a centre zone or other area with many employment opportunities the area is well-serviced by existing or planned public transport there is high demand for housing or for business land in the area, relative to other areas within the urban environment.	The CRPS is due for review in 2024 but in the meantime the existing CRPS is not in accordance with the NPS-UD 2020. The proposed rezoning is on the edge of the District's largest centre, which offers a wide range of community and business services, and employment opportunities. It is expected that a proportion of future residents will commute outside the township, but as the township and associated business areas e.g. at Southbrook, continue to grow, this is expected to become proportionally less. Rangiora is well serviced with public transport, there is scope for future mass transit PP, and there is a high demand for housing at Rangiora. The Site adjoins the new West Rangiora Development Area, to the south. Extensions of public transport to service this growth area will be readily accessible to the Site.
Objective 6: Local authority decisions on urban development that affect urban environments are: integrated with infrastructure planning and funding decisions; and strategic over the medium term and long term; and responsive, particularly in relation to proposals that would supply significant development capacity.	Whilst not currently identified as a future growth area in RMA documents, the Site is well placed at the township edge to be serviced by existing infrastructure. Some upgrades may be required, which will be investigated further with Council prior to the hearing. See Policy 8 below for commentary on proposals which supply significant development capacity
Objective 8: New Zealand's urban environments: support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change	The proposal adjoins the existing built up are of Rangiora, close to public transport links. Its excellent accessibility to Christchurch City, substantially enhanced with the new Northern Motorway extensions, means it is now highly accessible to these nearby major employment areas. Travel distances are relatively short, minimising vehicle miles and the potential for greenhouse gas emissions. There is a cycleway link from into Christchurch City, and regular bus services, including an express route. The Site is inland and not subject to natural hazard risks associated with sea level rise arising from climate change.
Policy 1 – Planning decisions for well-functioning urban environments	Assessed at para 41-50
	The proposed rezoning is anticipated to provide sections that will be available for the short term (up to 3 years) and into the medium term (3-10 years) if adopting a more conservative outlook.

Policy 2 - Sufficient development capacity Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.	The locational and amenity advantages of Rangiora also favour strong ongoing demand. The PWDP UFD-O1 Feasible Development Capacity for residential activities identifies the need for 6300 residential units in the period 2018-2028, and 7100 residential units 2028-2048. These numbers are derived from Chapter 6 CRPS Table 6.1. and are out of date. Data from the Council (November 2021) confirms that there are about 800 vacant lots in Rangiora. Building consents are at about 180/year. That means there is about 4 years vacant land supply. A lead in time of 3-5 years is needed to go from rezone to house build so the Council is facing an unnecessary squeeze on land availability. That will translate in to an upward shift in land and section prices as has been the case at Rolleston. The data suggests that the PWDP will be late to the party to ensure there is at least sufficient development capacity to meet expected demand for housing land over the short term, medium term, and long term. There is a looming, inevitable land supply issue so any proposal to add capacity will push the Council closer to meeting the requirements of the NPS-UD. The proposal is consistent with ensuring there is at least sufficient land supply for housing.
Policy 8 – Responsiveness to plan changes Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is: (a) unanticipated by RMA planning documents; or (b) out-of-sequence with planned land release	The proposed rezoning is not anticipated by RMA documents - it is not a Greenfield Priority or Future Development Area in the CRPS, or a New Development area in the PWDP. A responsive approach to the proposal is required as it meets the Policy 8 criteria for unanticipated zoning. It will contribution to well functioning urban environments and will add significant development capacity. There is no development capacity for the housing typology proposed – so any provision is significant in this context. The development will deliver appx 311 high amenity large lot residential sites at an average density of 1500m2. This will be higher if a mix of densities are proposed, which may be appropriate in some parts of the Site, dependent on master planning work to follow.

91. Adopting the submission to re-zone the land, and enable the proposed development on the submission Site will satisfy the objectives and policies of the NPS-UD.

Proposed National Policy Statement for Highly Productive Land (NPS-HPL)

92. The Government proposed in 2019 a NPS-HPL to prevent the loss of productive land and promote its sustainable management. The overall purpose of the proposed NPS-HPL is to improve the way highly-productive land is managed under the Resource Management Act 1991 (RMA) to:

a) Recognise the full range of values and benefits associated with its use for primary production
b) Maintain its availability for primary production for future generations
c) Protect it from inappropriate subdivision, use, and development.

93. The NPS-HPL is still a proposal and not intended to take effect until after Gazettal. At the date of this submission the NPS-HPL has no effect and no assessment of it is required for the purposes of this submission.

94. The Proposed NPS-HPL interim definition of HPL is land defined as Land Use Capability Class 1-3 soils. A portion of the Site contains Class 2 and 3 soils (see **Figure 10)**. Highly productive use of these soils is not realistic given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production). Its present use as lifestyle blocks, low level grazing and agistment is the more likely long run use of the Site if not rezoned.

95. Objective 3 of the Proposed NPS-HPL specifically refers to highly productive soils being protected by avoiding *"uncoordinated urban expansion on highly productive land that has not been subject to a strategic planning process"*.

The Site was assessed through a strategic planning process (WDDS 2018) and the RRS as a preferred site for LLRZ development, and rejected for a change in zoning on the basis that it may be required for long term urban growth of Rangiora.
96. It is therefore considered that this submission to re-zone the Site is largely in accordance with the Proposed NPS-HPL.

National Planning Standards

97. The National Planning standards prescribe various matters under the RMA so that there is consistency among planning documents most relevantly here in terms of appellations for zones, and the standards applying to these zones.
98. The proposed rezoning adopts the standard zone appellation, in this case LLRZ as contained in the PWDP.
99. The PWDP identifies plan standards for minimum and average net site areas for the respective zones. These are modified for the proposed rezoning as a higher density LLRZ.
100. The higher density LLR zoning is entirely consistent with the NPS purpose for the LLRZ as reproduced below. In this case, the principal constraint to more intensive development is the peri-urban location where a lower density transition to the rural environment is appropriate (particularly noting that the zone boundary is 'mid block' so there is no natural or physical buffer between rural and residential areas); the existing pattern of 4 ha lots with existing substantial homes and gardens; and the fact that the premier large lot subdivision proposed relies on consistency of housing quality and character to be deliver on this vision for the area.

Large lot residential zone

Areas used predominantly for residential activities and buildings such as detached houses on lots larger than those of the Low density residential and General residential zones, and where there are particular landscape characteristics, physical limitations or other constraints to more intensive development.

Low density residential zone

Areas used predominantly for residential activities and buildings consistent with a suburban scale and subdivision pattern, such as one to two storey houses with yards and landscaping, and other compatible activities.[2]

Canterbury Regional Policy Statement 2013 (CRPS)

101. Chapter 6 of the RPS *"provides a resource management framework for the recovery of Greater Christchurch, to enable and support recovery and rebuilding, including restoration and enhancement, for the area through to 2028. Recovery in Greater Christchurch is also supported by the provisions in Chapter 5 notated as 'Entire Region'. The provisions in the remainder of the RPS also apply.3"*
102. An assessment of the proposed rezoning against the relevant CRPS Objectives and Policies is set out in **Appendix 1**. This should be read in the context of the CRPS being overdue for review and that it does not provide a regional response to the NPS-UD. The
need to focus on earthquake recovery has now passed and so many of the directive provisions need to be given appropriate 'weight' in a new national policy environment with a focus on flexible, responsive panning approaches that better provide for people's needs and well-being.
103. That assessment shows that

a) The development proposal achieves the objectives for the location, design and function of new developments (Objective 5.2.1)

b) The traffic effects of the proposal are unlikely to give rise to adverse effects and so achieves CRPS objectives for the strategic land transport network (Policy 5.3.7)

c) The Site falls outside the FDAs shown on Map A of Chapter 6 and in that regard is inconsistent with RPS Policy 6.2.1 clauses 1 to 3.

1. identifies priority areas for urban development within Greater Christchurch;

2. identifies Key Activity Centres which provide a focus for high quality, and, where appropriate, mixed-use development that incorporates the principles of good urban design;

3. avoids urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS

d) The environmental effects assessment outlined above establish that the proposed development is consistent and will not give rise to any concerns with respect to all the matters listed in RPS Policy 6.2.1 clauses 4. to 11. These matters are:

6.2.1 Recovery framework

Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that:

1. As above;

2. As above;

3. As above;

4. protects outstanding natural features and landscapes including those within the Port Hills from inappropriate subdivision, use and development;

5. protects and enhances indigenous biodiversity and public space;
6. maintains or improves the quantity and quality of water in groundwater aquifers and surface waterbodies, and quality of ambient air;
7. maintains the character and amenity of rural areas and settlements;
8. protects people from unacceptable risk from natural hazards and the effects of sea-level rise;
9. integrates strategic and other infrastructure and services with land use development;
10. achieves development that does not adversely affect the efficient operation, use, development, appropriate upgrade, and future planning of strategic infrastructure and freight hubs;
11. optimises use of existing infrastructure; and
12. N/A

e) The proposed rezoning achieves policies relating to:
- Sustainability;
- Integration of transport infrastructure and land use;
- Urban design; and
- Biodiversity, natural hazards, landscape, soils, contaminated land.

104. In terms of the CRPS polices for rural residential developments (Policy 6.3.9) the proposal sits square with all policy matters other than being a location identified in an adopted Rural Residential Strategy; and being at a higher density than provided for under this policy (ie greater than 1-2 hh/ha). As such it has a majority of features entirely consistent with the policy.
105. The CRPS includes housing capacity targets as below

6.2.1a Targets for sufficient, feasible development capacity for housing [inserted in accordance with sections 55(2) and 55(A) of the Resource Management Act 1991, from the National Policy Statement on Urban Development Capacity 2016]
For the period 2018-2048, sufficient, feasible development capacity for housing is enabled in Greater Christchurch in accordance with Table 6.1.
Table 6.1 Targets for housing development capacity in Greater Christchurch, 2018-2048

106. These derive from Our Space, under the requirements of the then NPS-Urban Development Capacity 2016, since replaced by the NPS-UD 2020. The targets (known as bottomlines in the NPS-UD) are to be treated as 'minimums' not 'maximums'.
Policy 6.3.12
enables urban development in the Rangiora and Kaiapoi FDAs (new Development Areas in the PWDP) where needed to meet the medium term targets. This a 'minimum' allocation approach contrary to the NPS-UD. The NPS-UD favours over allocation, including in locations unanticipated by RMA plans, where it will add additional development capacity, can be integrated with infrastructure planning and funding, and will contribute to well functioning urban environments – as is the case the proposed Lehmans LLR D2 zone.
107. The proposed Lehmans LLR D2 zone is consistent with the CRPS except with respect to those parts of the CRPS which are out of step with and do not give effect to the higher order plan, the NPS-UD.

Proposed Waimakariri District Plan
108. An assessment of this proposal against the relevant PWDP Objectives and Policies for urban growth and development as notified on 17 September 2021 is set out in **Appendix 2.**
109. That assessment shows that the proposed rezoning is entirely consistent with the relevant objectives and policies, including as sought to be amended by this submission. Those amendments are to UFD-P3 Identification/location and extension of Large Lot Residential Zone areas; and LLRZ-O1 and LLRZ- P1-5 and reflect the intent and outcomes intended for the proposed LLRZ D2 zone, which is a higher density LLRZ zone than the PWDP LLRZ zone (renamed LLRZ D1 in this submission).

ASSESSMENT AGAINST OTHER PLANNING DOCUMENTS
Our Space 2018-2048 Greater Christchurch Settlement Update (2019)
110. Our Space is a non-statutory document prepared under the Local Government Act. It
"responds to the new Government Policy Statement on Land Transport, which has increased funding for mass public transit schemes, and meets the requirement of the National Policy Statement on Urban Development Capacity (NPS-UDC) 2016 to prepare a
future development strategy…. Specifically, it:
• sets out how targets for housing for the next 30 years will be met, accommodating an additional 150,000 people;
• identifies locations for housing growth, encouraging Central City and suburban centre living while providing for township growth in Rolleston, Rangiora and Kaiapoi;…

• *promotes a compact urban form, which provides for efficient transport and locates development in a manner that takes into account climate change and sea level rise.[4].*

..Underpinning this settlement pattern approach is the vision for a transformation of the transport network that fosters much greater public and active transport usage, and reduced reliance on the private vehicle.

111. Our Space acknowledges that this will require commitment from the Government to invest in the necessary improvements to our transport system, which could include investing in rapid transit services. To date, there has been no successful business case for improved public transportation, including not as a Covid 19 fast track infrastructure project.

112. The Our Space housing capacity targets (Table 3) and Future Development Areas are related to growth of urban areas.

113. Our Space, like the CRPS (and the Operative District Plan) are now out of date, as they do not reflect or give effect to the new requirements of the NPS-UD.

Waimakariri 2048 District Development Strategy (WDDS)

114. The preferred growth directions for Rangiora in the WDDS 2048 (2018) are outlined above (under 'Site') i.e. westwards to Lehmans Road, and otherwise eastwards. However, the Council in its decision on the RRS, recognized west of Lehmmans Road as a potential longer town urban growth area.

115. The WDDS Rangiora Snapshot (pp38-39) -when looking ahead to 2048 proposed that:

a) Rangiora remains the District's largest town
b) 30,000 – estimated population (2048)
c) 12,025 – estimated households
d) 5,025 - new households in Rangiora
e) Continues to accommodate one third of the District's residential growth
f) 167 – estimated annual building consents for new dwellings for the next 30 years
g) 423 hectares of additional feasible residential land required by 2048 (this includes capacity in remaining stages of existing residential developments as well as new greenfield areas inside and outside of the Infrastructure Boundary)
h) Future residential growth directions proposed to the east (predominantly) and west of the current town
i) Opportunities for intensification/regeneration to be identified
j) New growth directions take into account areas of unacceptable natural hazard risk and areas of significant environmental and cultural values
k) New growth areas to connect into existing sewer and water networks
l) Stormwater Levels of Service designed to meet increased performance requirements

116. At the 2018 Census Rangiora had a population of 17,841, and 7314 total dwellings (incl those unoccupied and under construction). Population projections for the District show an average annual change 2018-2020 of 1700 persons. If Rangiora continues to attract a third of all district growth as stated in the WDSS then Rangiora's population in 2021 will be around 18,900.

Mahaanui Iwi Management Plan

117. Part 1 of the PWDP in a section "Mana Whenua" sets out the position with respect to iwi and the review of the district Plan:

a) The District's territorial area sits within the takiwā (territory) of Ngāi Tūāhuriri which is one of eighteen Ngāi Tahu regional papatipu rūnanga, constituted under the ***Te Rūnanga o Ngāi Tahu Act 1996*** *to represent* ***mana whenua*** *interests.*

b) The preparation and change of a district plan must take into account relevant iwi documents. For the District, Ngāi Tahu has set out its resource management values, issues, objectives and policies within the Mahaanui Iwi Management Plan (2013).

c) The Mahaanui Iwi Management Plan identifies objectives, issues and policies for natural resource and environmental management for six pāpatipu rūnanga (including Te Ngāi Tūāhuriri Rūnanga). It seeks to ensure that the taonga and resources of Ngāi

Tahu mana whenua are recognised and protected in the decision-making of statutory agencies. The Mahaanui Iwi Management Plan contains a comprehensive suite of policies and objectives addressing the range of resource management matters of significance to tangata whenua. The District Council shall have regard to the Mahaanui Iwi Management Plan when preparing or changing the District Plan, to the extent its content has a bearing on resource management issues of the District.

118. The Mahaanui Iwi Management Plan (MIMP) 2013 was released on 1 March 2013.

119. The MIMP is a tool for tangata whenua to express their identity as manawhenua and their objectives as kaitiaki, to protect their taonga and resources, and their relationships with these. The MIMP seeks to ensure that these taonga and resources are recognised and protected in the decision-making of agencies with statutory responsibilities to tangata whenua. Importantly it is also a tool

that assists Papatipu Rūnanga representatives to articulate their values, issues and policy into statutory processes.
120. The MIMP includes both general objectives and policies about the management of land, air, and water, and also includes catchment specific objectives and policies.
121. Section 5.3 Wai Maori (pp77-98) contains an extensive discussion about tangata whenua rights and interests in freshwater. It provides a suite of Issues, Objectives and Policies for freshwater
122. Section 5.4 Papatuanuku (pp101-124) sets out the Ngai Tahu Subdivision and Development Guidelines that are to be read along-side objectives relating to:

a) Land use planning and management in the takiwā reflects the principle of Ki Uta Ki Tai. (from the mountains to the sea)

b) Rural and urban land use occurs in a manner that is consistent with land capability, the assimilative capacity of catchments and the limits and availability of water resources.

c) Inappropriate land use practices that have a significant and unacceptable effect on water quality and quantity are discontinued.

d) Ngāi Tahu has a prominent and influential role in urban planning and development.

e) Subdivision and development activities implement low impact, innovative and sustainable solutions to water, stormwater, waste and energy issues.

123. Section 5.5 Tane (pp127-137) includes objectives that focus on:

a) Regional policy, planning and decision making in the takiwā reflects the particular interest of Ngāi Tahu in indigenous biodiversity protection, and the importance of mahinga kai to Ngāi Tahu culture and traditions.

b) The customary right of Ngāi Tahu to engage in mahinga kai activity is recognised, protected and enhanced…

c) Customary use, and therefore mahinga kai, is given effect to as a first order priority for freshwater management in the takiwā.

124. Section 6.4 (pp213-224) addresses issues of particular significance to the lands and waters of the Waimakariri catchment within which the Site lies.
125. Relevant Objectives relating to urban development of land in that catchment include:

a) The natural “energy, vitality and life” of the Waimakariri River as a braided river is protected and restored.

b) The discharge of contaminants to the Waimakariri and its tributaries is eliminated.

c) Water quality and flows in the Waimakariri and its tributaries are improved to enable whānau and the wider community to have places they can go to swim and fish.

d) The mauri and mahinga kai values of the Waimakariri and its tributaries and associated springs, wetlands and lagoons are protected and restored; mō tātou, ā, mō kā uri ā muri ake nei.

126. A key issue relating to subdivision and development is that subdivision and development activities in the lower catchment have the potential to adversely affect Ngāi Tahu values such as waterways, mahinga kai and sites of significance (Issue Wai4).
127. The proposal provides for full urban reticulation of the three waters and is consistent with the objectives and policies contained in Chapters 5.3 and 5.4 of the MIMP. The proposal does not preclude individual land owners from installing rainwater collection and use from roof areas at the time of building development.
128. The proposal has been designed taking into consideration the potential effect of resultant subdivision and development on the rivers and streams that flow into the lowland rivers.
129. Overall it is considered that the proposal will not have adverse impact on the cultural values of iwi as set out within the MIMP.

SECTION 32 ASSESSMENT

130. A Section 32 assessment is contained in **Appendix 3.**
131. In summary, the PWDP zoning and associated rules (RLZ Zone with a minimum lot size for subdivision and a dwelling 4ha) do not meet the needs and aspirations of the current owners.
132. Strategic Council planning documents (specifically the WDDS) have a focus on only meeting urban growth demands within urban environments of existing towns. They favour intensification (15hh/ha) and a strict allocation of capacity by development areas. It is a control and command regime consistent with Map A of Chapter 6 of the CRPS but is out of step with the requirements of the NPS-UD which requires a more flexible, responsive approach, prohibits a hard fixed unmoveable urban/rural boundary.
133. This approach leaves little room for new proposals or proposals that do not sit square with the standard array of GRZ/medium density or SETZ (Settlement Zone). SETZ applies to some of the District’s smaller settlements outside Greater Christchurch.
134. Neither LRZ nor Large Lot Residential (LLRZ) as notified in the PWDP is an efficient use of this block of land located as it is immediately adjoining the urban area of Rangiora, and in a location easily accessible to the town centre by active transport modes as well as car and several district reserves.
135. If this Site is not zoned for LLRZ D2 (minimum average lot size 1500m^2) use to enable residential re-development then it will drive pressure to re-zone elsewhere. That step potentially will not have the significant benefits to Rangiora long term in relation to enabling a well-functioning urban environment that enables people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future. Additionally re-zoning to LLRZ D2 will contribute to providing additional development capacity to meet the different needs of people and communities in a planned manner and

consistent with the NPS-UD.
136. The Site can readily be developed to reflect the principles of the Urban Design Protocol with values of character, context, and connectivity.
137. The Section 32 assessment concludes that the proposal to re-zone the Site from LRZ zone to LLRZ D2 Zone (average lot size 1500m2) is the most appropriate method for achieving the objectives of the proposal, than the other alternatives considered.
138. Option 2 identified in the s 32 assessment is consistent with some PWDP policies notwithstanding that it does sit square with the strategic intentions signaled in the WDDS and the PWDP approach to providing for development capacity and urban development.
139. Option 2 identified in the s 32 assessment to re-zone the Site is the most appropriate given:

a) The proposals adopt the PWDP zones, development and activity standards with appropriate amendments. This ensures continuity of the District Plan anticipated environmental outcomes and urban amenity for Rangiora and adjoining residential areas;

b) Will be consistent with and give effect to many of the relevant PWDP objectives and policies;

c) It is a logical extension to the developed and developing residential land adjoining the Site while achieving a compact, efficient urban form that removes pressure on isolated rural land elsewhere around Rangiora.

d) It gives effect to the NPS-UD, specifically Objective 6 c) and Policy 8, delivering significant additional development capacity and contributing to a well functioning urban environment.

e) It is assumed that there will be capacity in the public utilities and the existing road network, including planned upgrades, to accommodate the traffic effects of the redevelopment;

f) The proposed Site specific ODP will provide certainty of the final form and disposition of the re-zoned area including its proposals for reserves, roading, future linkages for pedestrian and vehicular traffic.

140. The re-zoning proposal is considered to be appropriate to achieve the sustainable growth and development of Rangiora.
141. The economic, social and environmental benefits of the proposed rezoning outweigh any potential costs.
142. The overall efficiency and effectiveness of the proposed rezoning (Option 2) is high, in comparison to the alternative options set out in the s 32 Assessment which are low (Options One and Four) or low to moderate (Option Three).
143. The PWDP proposes to release land for development in the new Development Areas at Rangiora and Kaiaipoi through a novel and untested certification process that is not clearly derived from RMA statutory powers, nor Local Government Act 2002 (LGA) authority. This approach is not proposed for the LLR Overlay areas. As the proposed Lehmans Road LLR D2 zone proposed by this submission seeks large lot urban densities, it is anticipated that Council may favour the certification process if it accepts the proposed rezoning. This is opposed – rezoning to LLRZ D2 is sought.
144. Potential difficulties with the proposed certification process are identified and discussed in the Section 32 Assessment. (**Appendix 3)**. In summary, the process is hugely discretionary, does not provide conventional rights to an applicant (eg right of objection/appeal) meaning decisions cannot be challenged, and it is not apparent that the process will be appropriately documented with a transparent record of the decision-making within the certification process. Further uncertainty arises in the practicalities of how to negotiate and manage the staging, funding and building of key infrastructure across a range of Sites, and a risk that land supply is controlled by a limited number of large developers. It is a far less efficient and effective method for delivering land for housing than the Council rezoning the land in the PWDP.
145. The proposed rezoning is considered to be the most appropriate, efficient and effective means of achieving the purpose of the RMA.

CONSULTATION

146. The landowners and their consultants have submitted on the WRRS and the WDDS (**Appendix 4)**.
147. The submissions to re-zone as rural residential or identify the Site as suitable for LLRZ have been rejected as noted above. LLRZ but at higher densities as now proposed is considered to be a more efficient use of the land and better meets market demand. 5000m2 sites provide more land is needed for a spacious home and garden.
148. The landowners have been consistent in their wish to find a zone and possible land uses better suited to their needs.

CONCLUSION

173 The submission seeks to rezone 58 ha of land adjoining Rangiora from Lifestyle Rural Zone (LRZ) to Large Lot Residential with a specific density standard (LLRZ D1), minimum average lot size 1500m^2.
149. The Site has a long history of rural lifestyle use. It is not significantly restricted by potential natural hazards especially flooding, nor does it have physical limitations for development for residential purposes as it is not liquefaction prone, and has no known geotechnical limitations but does contain an area of LUC 2 soils. It is near a site of significance to iwi (SASM – 025) being the Rakahuri/Ashley River The Site has access to a collector road and is near to a strategic road giving direct access to the town centre and a range of community amenities and facilities.
150. The Site immediately adjoins the urban area of Rangiora, and is well located to join in to Council utility services. It is well suited for conversion to residential use.
151. The Site is not identified within the westward growth direction for Rangiora in the District Development Strategy 2018 nor is

it part of the DEV-WR development area which adopts Lehmans Road as its western boundary. It is in a location that achieves coherent and compact urban form offering ease of access to business services, community facilities, reserves and the primary road network.
152. The proposed rezoning provides for a connected and high amenity residential living environment not presently available under the PWDP while avoiding and/or mitigating any potential adverse effects on the environment. It will provide for continuing high demand for a variety of high quality residential sections aimed at a particular segment of the housing market in an ideal location, easily accessible to the existing town centre services and facilities. It will broaden the range of housing available. As such, it is consistent with the NPS-UD including Objective 6c) and Policy 8, to be responsive to proposals which supply significant development capacity and contribute to a well functioning urban environment.
153. The use of this Site for residential purposes can be a sustainable and efficient use of land and infrastructure. The proposed rezoning better provides for the social, economic, environmental well-being of the landowners and the Rangiora community than continuation of the current low intensity lifestyle land use on 4ha blocks, or a conventional LLRZ residential use.
154. Any potential adverse effects of the implementation of the proposed rezoning can be assessed at subdivision stage but there has been no restriction on servicing the blocks to date. Capacity will need to be confirmed for infrastructure, power and road network. Any future subdivision of the Site will need to confirm water supply and wastewater treatment and disposal options.
155. Rezoning of the site to LLRZ zone is not inconsistent with the policies and objectives of the PWDP, but it is at odds with the dated CRPS approach to provision of urban growth and housing capacity for Greater Christchurch, to the extent that it is not within an FDA created by Change 1 to the CRPS and is not identified as an LLRZ site under the strategic RRS prepared by the Council.
156. As the proposal helps achieve the purpose of the RMA, and has been shown to be consistent with the relevant provisions of the NPS-UD, the submission can be accepted by Waimakariri District Council.

Original Submission

Summary Reasons for the Submission

The reasons for our submission are outlined below.
a) The preferred relief (**the proposed rezoning**) is both appropriate and necessary to achieve sustainable growth and development of Rangiora and the District and meet the requirements of the National Policy Statement for Urban Development 2020 (**NPS-UD**).
b) The Site identified in Figure 1 and at para 1 of the Preferred Relief above is a logical and preferred location that lends itself to a specific type of housing development not provided within the PWDP as a residential option adjoining but outside the existing urban areas. Nowhere is it possible to develop in a comprehensive, coordinated way a low density, high quality residential environment in the District's towns, the Rural Lifestyle Zone or Settlement Zone as a permitted activity.
c) The requirement for 12/15 hh/ha in GRZ zones (the majority of land in urban areas) drives development to modern scale relatively small urban lots best produced as a package across a significant land holding. The GRZ subdivision standards do not provide for the needs of people who seek a generous sized urban lot residential setting. This is a housing sector that is running against the planning tide of intensification but is, nonetheless, a legitimate form of housing in an appropriate setting. The barriers to such development in urban areas requires an appropriate setting/ location in the rural areas but close to or adjoining the urban areas and at a much lower density than is desired or appropriate (the PWDP LLRZ) to meet the housing needs for generous sized urban lot residential living..
d) The PWDP subdivision standards for LLRZ require lots that are very large for those whose primary interest in a rural setting is a form of residential living, not one that requires significant maintenance and management often involving animals or machinery at scale. Conversely, the GRZ subdivision standards do not provide for the needs of people who seek a large lot residential setting
e) The focus in the PWDP is on prescribing a limited range of residential options and tightly controlling and constraining housing choice within those options. Further urban growth is also tightly constrained and controlled around DEV areas around Rangiora and Kaiapoi but for a very specific form of residential development driven off density requirements that do not match the needs of all landowners.
f) The focus in most new District Plans, driven in part by the National Planning standards, is to simplify the range of zones, to standardize lot sizes, to supposedly create efficiency and certainty through ease of administration of the District Plans. This is done by constraining housing and land development choices by lot size, by location, by built standards and the disposition of built/open elements in a site. However, the National Planning standards do provide for large lot urban residential living, a residential living option which has not been taken up the PWDP (due most likely to the restrictive provisions of the CRPS which only prescribe one from of lower density residential living, at a density of 1-2 hh/ha).
g) This planning approach may be a standard approach to resource allocation but it does not provide a flexible, responsive

approach to innovative and new development options. The Government is creating policy settings that on one hand seek intensification in urban areas, while at the same time pushing away from a land allocation model of planning. The PWDP in striving to face both policy directions has a package of measures that are in fact a major barrier in terms or cost, timeframes and certainties for proposals that are not cut from the suite of housing and development options set out by the PWDP. The allocation of land in preferred development areas, it must be said, runs counter to the Government's push, and now its direction, to free up land for development, to encourage innovation in housing (presently with a focus of intensification) and to make available a range of responses to the need to meet the housing needs of people and communities set out in the NPS-UD.

h) While the weight of demand (and the planning response) is around affordable housing, around small lots and dense development that supports investment in public facilities and amenities such as public and active transport, reserves, and commercial services, there is always a wide spectrum of preferences at play in the housing market. The demand for high quality, generous houses set on generous sized parcels of land within high amenity settings is an important and no less relevant housing sector. There is a strong unmet demand, as confirmed by advice from Bayleys real estate (**Appendix 5**) for larger family homes with room for a pool or similar. Purchasers want to be close the amenities of Rangiora and within walking and cycling distance of local schools. They do not want the only available options – a 4 ha lifestyle block or 5000m^2 rural residential site at Mandeville or Ohoka.

i) Interestingly enough for a nation built on the so-called quarter acre paradise, recent policy and planning interest in housing and land development has now seemingly positioned the 1011m^2 section as a luxury item, as the antithesis of providing for community well-being and needs. It is as though the old quarter acre of itself acts against building a sense of community despite being able to be developed in a planned, structured, coordinated or integrated manner. Rather than being a frivolous discretionary item in land development
and housing choice, a well-planned, well located and properly serviced low density residential environment has much to offer urban environments. They can be tactically used to provide shape and edge to urban areas, they can provide a mass of amenity different from (and potentially complementary to), but no less legitimate in urban outcome terms, to conventional GRZ zoned land.

j) In many ways the approach of a district plan to the role and place of the old quarter acre is not dissimilar to the issues faced by comprehensive retirement villages when first proposed. The idea of dense, almost gated and self-contained communities, with multi storey buildings also did not sit well in many district plans. But now they are accepted as an important part of the urban fabric catering to a specific demographic and health demographic. Most plans enable them.

k) Provision for low density residential in an urban setting, or failing that likelihood, in an adjoining rural zone is a fundamental gap in the district plan.

l) The submission seeks to provide for another housing typology not provided in the PWDP and in a location with significant planning merit. The planning case was made out in a detailed submission to the proposed Rural Residential Strategy (**RRS**) for the land identified in this submission to be "reserved" for conventional Rural Residential zoning in the review of the District Plan. That submission was rejected in favour of a decision ascribing an unspecific strategic significance to Lehmans Road as the urban boundary; simply the decision was that rural residential development here would preclude this area as a future urban growth path, even though this was likely to be very long term as the Waimakariri District Development Strategy (WDDS 2018) for the period up to 2048, does not favour urban growth west of Lehmans Road.

Officer Recommendation

Continue to exclude the area west of Lehmans Road and the racecourse land at Rangiora as growth areas as these were originally considered but not included in the draft RRDS as they trigger the key preliminary criteria of: being on the direct edges of a main town outside of the Projected Infrastructure Boundary (PIB) thereby foreclosing more intensive long-term urban development, and…

Panel Recommendation

The panel accepted the officer recommendations to exclude areas on the fringes of Rangiora in the final RRDS due to these having the potential to foreclose more intensive long-term urban development of the town.

m) In light of the above decision on the Waimakariri Rural Residential Strategy, the proposal now is for a form of high amenity low density urban zoning, which whilst in demand is entirely absent from the PWDP. This will be a long term urban form of development. The proposal set out in the submission will achieve a compact, and efficient, urban form on the edge of Rangiora with excellent connectivity by multiple transport modes. It provides for continuous urban development by enabling a built form which can act as a strong zone or urban boundary.

n) The proposed rezoning will accommodate approximately 311 LLRZ lots1 at the proposed amended density standards for LLRZ D2 (average size 1500m^2). It will contribute to a well-functioning urban environment, meeting the NPS-UD Objective 6(c).

o) Any adverse effects on the environment arising from the proposed rezoning will be minimal, if any, and can be adequately mitigated. A high amenity master planned development is proposed.

p) Significant positive effects arise from the proposed rezoning. It will enable the short term housing demand at Rangiora to be met, and can deliver a housing typology for which there is demand, on lots that are not a burden to the landowners (which is the case for 4ha and the very limited areas of LLRZ D1 with a density of 1-2 hh/ha) and for which there is no provision in the PWDP. At present rates of land uptake there is about 4 years vacant land supply in Rangiora. Given it takes 3-5 years to bring land from zoned state to on the market as developed lots, there is some urgency in providing additional capacity. This proposal helps address an anticipated shortfall in residential zoned plan enabled land.
q) There is no additional cost to the Council in re-zoning the Site as there is expected to be capacity in the public utilities and the existing road network, including planned upgrades.
r) Amendments to PWDP objectives and policies may be necessary to provide for a higher density LLRZ, but of themselves will not act against those relating to Strategic Directions Urban Form and Development and Urban Growth. The PWDP approach to zones and
identification of future development land is already out of step with higher order Resource Management Act 1991 (RMA) statutory documents because they do not give effect to the NPS-UD (and are sought to be amended through this submission).
s) The alternatives of retaining Rural Lifestyle or Large Lot Residential zone across the entire Site are not an efficient use of land which immediately adjoins the urban area of Rangiora, and is highly accessible to the town centre by active transport modes as well as car.
t) The proposed rezoning is consistent with and the most appropriate, efficient and effective means of achieving the purpose of the RMA.

The Site
1. The Site is a 58ha block of land ('the Site') accessed from Lehman Road, Rangiora **(Figure 1)**. It is owned by the two submitters and 12 other landowners.

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1 Assumes 20% of land area taken for servicing including roading, reserves and stormwater management if required.

Figure 1: The site (outlined in blue (Google Earth)

2. The Site is surrounded by RLZ land that is used for a mix of lifestyle and conventional farming. To the NE is the Rangiora Eco Holiday Park, and beyond the Park is the Rangiora Racecourse about 300m away from the nearest lot and 1km from the centre of the Site. Land to the south east is GRZ and part of urban Rangiora with newly developing residential land west of West Belt. About 1.9 km to the NW is Rangiora Airfield. About 1km north of the most northern lot is the Ashley River.
3. The southern-most lot in the proposal with the Rangiora Vet Clinic faces, but does not have access to Rangiora-Oxford Road (State Highway 72). This arterial road provides the main road connection in to the centre of the town. The well-established Fernside Rural residential area is about 2.5km west from the junction of Lehmans and Rangiora-Oxford Roads.

Figure 2: the site is a broader context (Site marked red)

4. The Site is not identified as lying within a preferred growth direction for Rangiora in the Waimakariri 2048 District Development Strategy (2018) (**WDDS**) **(Figure 3)**. No land west of Lehmans Road is included in the West Rangiora Development Area (**DEV-WR**) in the PWDP.

Figure 3: Figure 11 WDDS

5. The Council reviewed its strategic approach to the location and provision of Rural Residential land (now zoned LLRZ in the PWDP) in the WDSS. It adopted the position that it would:

a) Explore tools such as cluster development to manage rural character

b) For rural residential development, adopt an approach that has a primary focus on creating new rural residential areas, with a secondary focus on enabling large lot intensification within existing rural residential areas where there is sufficient community support and servicing available

c) Review the Rural Residential Development Plan for the whole District (pg 21 WDDS).

6. Rangiora presently has a population of 17,841 (2018 Census). It grew steadily between 2006 and 2018. Growth of Rangiora since then has continued in step with the district growth which has increased 8.2% between 2018 and 2021 from 61,300 to 66,300 at an annual average of 2.8% from 2018 to 2020 (Statistics NZ Subnational population projections at 30 June 2021: provisional).

2006 (count)	2013 (count)	2018 (count)
12,165	15,069	17,841

Statistics NZ

Population projections at 30 June

PLANNING STATUS OF THE SITE

Chapter 6 of the Canterbury Regional Policy Statement

7. An assessment of the CRPS is set out in **Appendix 1** to this submission.
8. The Site is within the Greater Christchurch area.
9. It was not shown as a Greenfield Priority Area – Residential (GPA) on Map A of the Canterbury Regional Policy Statement (CRPS). The GPA terminates at Lehmans Road.
10. As a result of the Minister for the Environment's decision of 28 May 2021 on Change 1 to Chapter 6, an area largely south of Oxford Road and a finger of land to the north of Oxford Road was included as a Future Development Area (**FDA**) (**Figure 4** orange).

Figure 4: Map A Chapter 6 Regional Policy Statement Greenfield Priority areas
Site location identified with red circle (appx)

11. The FDAs are intended to accommodate the increased demand for new dwellings in that part of Waimakariri District within the Greater Christchurch Urban Area and to respond to the NPS-UD. They do not provide "plan enabled" land as they need to negotiate a rezoning process to confirm their status as land developable for housing and other urban purposes.
12. The proposal for a LLRZ zone with average lot sizes of 1500m2 is inconsistent with the policy approach of Chapter 6 for Greater Christchurch, in that if fits none of the residential living typologies provided for in Chapter 6 and is not in a location identified for urban or rural residential development. It sits 'between' the urban and rural residential densities provided for in the CRPS (minimum 10 hh/ha for urban in Waimakariri, and average 1-2 hh/ha for rural residential). The proposed density is appx. 6.66 hh/ha.
13. Notwithstanding, the proposal meets all the location and other criteria in CRPS Policy 6.3.9 for rural residential development. It is:

- Outside the CIAL noise contours
- Has some sites with restrictions from the take-off and landing vectors for Rangiora Airfield but not such as to impact its operational capacity.
- Is outside the groundwater protection zone
- Is not within the Waimakariri stop bank system
- Has no views of or to the Port Hills
- Has good access for emergency services
- Will not create reverse sensitivity issues with adjoining land uses; Rangiora Racecourse is 500m away.
- Free of significant natural hazards and is a flat site.
- Supports no significant natural values or ecological values.

• Contains no SASMs.
• Can be integrated into or consolidated with the existing urban area of west Rangiora.
• Contains no surface water bodies so there will be no adverse impacts on these.
• The development will be contingent on an ODP to provide integrated design for subdivision and land use, and provide for the long-term maintenance of a high quality high density rural residential character.
• The proposal is not intended as a staged development towards full urban; rather it is intended to provide a unique residential environment that can stand alone and contribute to the urban fabric of Rangiora like Palmview in east Rangiora, or as Kaiapoi Lakes does for Kaiapoi.

14. Overall, the proposal is not consistent with Chapter 6 but that is more a function of its original purpose when formulated in 2013. Notwithstanding that, the submission for a lower density residential focussed, high quality urban environment that attaches to an existing urban area and that promotes a coordinated pattern of development has planning merit.

Operative Waimakariri District Plan

15. The Site is zoned Rural in the Operative Plan. The minimum lot size for subdivision and a dwelling is 4 ha.

Proposed Waimakariri District Plan

16. The Site is zoned Rural Lifestyle Zone **(LRZ) (Figure 4).** The minimum lot size for subdivision and a dwelling in the LRZ is 4 ha.
17. Oxford Road is a strategic road and Lehmans Road is a collector road.

Figure 5: Proposed District Plan Zoning (site outlined in red)

18. The Site is also subject to, or potentially influenced by, a number of Overlays:
a) Rangiora Airfield Take Off Climb and Approach Obstacle Limitation Surface (**Figure 6**)
b) National Grid Transmission Lines (**Figure 6**)
c) Liquefaction: Liquefaction damage is unlikely (**Figure 6**)
d) Non-Urban Flood Assessment Area (**Figure 7**)
e) Geographic areas: Ecological Area – Plains
f) Ecological District – Low Plains

Figure 6: Rangiora Airfield Take-off and Approach vectors (blue dashed lines); Liquefaction damage unlikely (green)Transmission lines (green lines); Site outlined in red

Figure 7: Non-urban flood assessment & Waimakariri Flood Hazard maps
Blue – medium risk, green – low risk, white – very low

DEVELOPMENT PROPOSAL AND PROPOSED REZONING

19. Subdivision of the Site will create approximately 311 LLRZ D2 lots.
20. The key design drivers for the proposal are:
a) A high amenity premier residential zone with large houses on large sites – average 1500m^2, min 1000m$_2$ based on the St Kilda, Hamilton development concept (**Figure 8**).
b) LLRZ D2 standards would enable a lower density zone in the medium term e.g. 10 years to achieve a high quality consistent character subdivision. If developed as an integrated development subject to an ODP subdivision can be staged for to the proposal.
c) Creating strong connections with the immediate neighbourhood by providing a cohesive interconnected roading layout that picks up direct links to the eastern neighbourhood off Lehmans Road and the northern subdivision roading, and carries them into the Site.
d) Creating a high amenity and diverse residential neighbourhood by providing interfaces to roads, reserves and rural environments.
e) Respecting and building on local identity and character of Rangiora by retaining specific vegetation features from the Site, and anchoring the development into the wider landscape.

21. A development concept can provide for sound urban design by:
a) A hierarchy of movement corridors.
b) Prioritisation of walking and cycling.
c) A north-south alignment of street blocks to maximize solar access and provide for efficient use of lots.

d) Block perimeters being kept as small as practicable to aid permeability and higher public amenity.
e) Enabling a range of housing typologies set in high quality landscape and street setting with generous amenity plantings and curtilage.

Figure 8: St Kilda development images (Bayleys)

22. St Kilda, Cambridge is a premier development on the outskirts of Cambridge, centrally located and with easy access to the Waikato Expressway. It was originally part of a small dairy operation which was dissected by the Waikato Expressway, leaving a portion within the Cambridge Town boundary and the larger balance of the property of approximately 80 ha (which became St Kilda) on the Eastern side of the Expressway, left in the Rural Zone.
23. The initial development concepts were for a Rural Residential type development given the Expressway separation of the existing residential development on the Western side of the Cambridge Bypass, however this was not supported by Council and a new concept of larger residential sections of a 1600m² average size was developed and approved – see https://www.stkilda.nz/page/location/

EFFECTS ON THE ENVIRONMENT

Township growth and urban form

24. The Site immediately adjoins the western edge of urban Rangiora.
25. The WDDS indicated a general preference for the direction of urban growth of Rangiora to the east as a way of balancing up the residential areas around the town centre and some growth to the west.
26. The approach of the WDDS was to signal growth options to be confirmed in the District Plan Review:
The broad directions for greenfield residential growth for the District's main towns are set out in Figures 11 to 14. Further work will be carried out to identify and confirm the exact locations and extent of these residential growth areas, together with the intensification opportunities within existing urban areas. These will be enabled through the District Plan Review and other planning tools.
27. The Strategic Planning documents clearly signal active consideration of growth needs and growth directions. The options available to the Council were constrained by the approach of the CRPS as the District Plan has to give effect to the CRPS and cannot be
inconsistent with it. The CRPS took effect in 2013 and is overdue for review.
28. The CRPS tightly holds urban growth to the constraints of Map A Chapter 6 and the identified FDAs which although amended by Plan Change 1 in 2020 does not respond to the directions of the NPS-UD. In any event the approach is focused on the need for housing in full urban residential land, less on other residential development forms.
29. As such the Site falls outside the planning policy framework for urban growth. However, in terms of urban form and on the ground, there is considerable merit and logic to conversion of this existing LRZ land to a new high amenity residential form that can be integrated into the Rangiora urban fabric.
30. The proposal has the potential to anticipate the longer term growth path confirmed by the decisions on the RRS to protect the future growth option of more intensive urban development in this direction. It can set a pathway to further westward expansion on land
that holds few if any physical barriers to land development.
31. The proposal will contribute to the housing needs of Rangiora and in a form and location that does not undermine the long run urban form of Rangiora. Planned growth confirmed in the PWDP is already intended to extend westwards out to Lehmans Road and to keep the town edge squared up providing depth to future development and providing a rational basis for providing movement networks driven off the key roads such as Rangiora-Oxford Roads. The West Rangiora Future Development Area confirms this approach. The Site sits in the next block west of Lehmans Road so is not proposing a disjointed urban form, nor one that is not part of the long term thinking of urban form and growth for Rangiora.

32. A full residential zoning is proposed under LLRZ D2 and will provide a high quality street character, overall amenity and passive surveillance over the street, and will create the correct lighting standards, roading standard, fully formed footpaths and cycleways required for a high quality urban environment.

Neighbourhood and wider community effects

33. The Site is serviced by a collector road and is close to an arterial road. This provides for ease of access and safe and convenient movement to and from the Site. A planned development co-ordinated by an ODP can facilitate within the site

movement corridors and linkages through the Site to provide for walking and cycling.
34. A key positive neighbourhood and community effect will arise from the existing dwellings and their established gardens and plantings that will anchor new development and provide a point of reference for new dwellings. Development will not be on a bare site; it will take place in an existing established part-residential setting. The transition to a low density, high quality premier residential development will start from a favourable position and minimise the apparent extent and nature of the landscape change.
35. The Site is comparatively large (58.4 ha) and has the potential to support a variety of residential building typologies and this will contribute to a mix of households within the development and provide built form variety and interest in the streetscape. Whilst LLR D2 standards are proposed, it may be that part of the Site is suitable for other higher density forms of development, which would be within scope of the alternative relief, and could be considered as part of the master planning process required for preparation of an ODP (ahead of the hearing). The earlier stages of the St Kilda development were for large lot residential, with more clusters of townhouses included as later stages (and a retirement village). A retirement village is unlikely in this case, given the proximity of the Charles Upham Retirement Village.
36. Rangiora is well-positioned to accommodate and service the needs of a fast-growing resident population that will in turn support more business activity, schools, community facilities and community organisations.

Effects on tangata whenua values
37. The Proposed District Plan does not identify any Sites and Areas of Significance to Maori in the Site, but the nearby Rakahuri/Ashely River identified as SASM-025. This has been scheduled as being
River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species
38. The PWDP has Policy SASM-P8 which is relevant to pre-development processes:
Engagement with rūnanga
Te Ngāi Tūāhuriri Rūnanga and the District Council to encourage engagement with the Rūnanga priorto persons undertaking activities and/or applying for resource consent where the activity has thepotential to adversely affect identified sites or areas of Ngāi Tūāhuriri cultural significance. Where priorengagement with Te Ngāi Tūāhuriri Rūnanga h as not been undertaken by an applicant for an activitythat has the potential to adversely affect an identified site, the District Council will consult with the Rūnanga.
39. The Site is not listed as an archaeological site on the NZ Archaeological Site database.

Landscape and visual effects
40. Rural Lifestyle style development exists on the Site now (a series of 4 ha lots with a dwelling and associated accessory buildings on each). The landscape is dominated by shelter belts, utility buildings, significant trees and planted curtilages around dwellings many of which are well set back off the roads down RoWs.
41. An ODP will help to achieve an integrated, cohesive and coherent development The proposal will lead to a modification of the landscape of the Site from a predominantly lifestyle block landscape to a denser semi-urban environment dominated by residential building that will, in time, get the benefit of street tree and reserve plantings and landscape treatments around the houses.
42. The visual effects which will arise from a change in the number of vegetative and built elements in the landscape are significant, but not avoidable, if the Site is to contribute to the on-going growth of Rangiora. The change will contribute to a high quality amenity and quality of environment and one that will be entirely consistent with and supportive of the rural lifestyle residential development that has successfully established on the Site.

Well-functioning urban environments
43. The Site adjoins the existing built up urban area of Rangiora. Immediately to the east are existing or developing residential areas.
44. The conversion of the Site from present rural lifestyle uses to low density, high quality residential will continue a pattern of outward expansion of Rangiora. Such a change may not be consistent with the PWDP's identification of a Future Development Overlay for west Rangiora only as far west as Lehmans Road, but on the ground it will look and integrate as part of the urban fabric.
45. It will provide some replacement lower density living areas for the existing LLR zones at north west Rangiora – but at much more appropriate higher density that the LLR D1 standard which is 1-2 hh/ha. There are two such areas, shown on the planning maps below. River Road has an 'urban overlay' and is intended to be intensified to urban densities. The land on the opposite (east) side of Lehmans Road is a 'legacy' rural residential zoning which applies under the Operative District Plan. The landowners have developed the adjoining residential subdivision and wish to develop the land for full urban residential development. Services are in place to support this. The constraint to date has been Map A of the CRPS which does not include the land as a Greenfield Priority Area or Future Development Area, GR zoning of this land is consistent with the NPS-UD.

Figure 9: PWDP as notified – LLRZs shown in light grey. Diagonal stripes – urban growth overlay.
Site outlined in red.

46. Rangiora is growing apace. It is attracting significant interest from new home buyers as people respond to the significant investment in upgraded transport links (Northern Corridor and public transport) and a growing economic base for employment within the District and the City.

47. Rangiora has excellent connectivity to the City, both via the new Northern Corridor, and a nascent cycleway link into the City. There is a very regular bus service every half hour.(the No 1 Blue Line) The standard trip takes 70 minutes, and there is a twice daily weekday morning express service from Rangiora, and seven times weekday express out to Rangiora all via Kaiapoi.

48. The Site will step out the western edge of Rangiora, but as it exists in a peri-urban form now, such a change does not alter how the Site interacts with Rangiora as a whole. It is in many ways a functional part of urban Rangiora now; it's only the Zone boundaries and policy framework that create the sense of it not being part of Rangiora.

49. The Site is convenient to the Rakihura/ Ashley recreation trails, the racecourse, Arlington Park, and the airfield. The town centre is easily accessible.

50. The following assessment of the criteria in the NPS-UD for determining a well-functioning urban environment shows that the proposed rezoning will deliver urban, housing and residential outcomes that meet those criteria. There will be a variety of homes enabled by generous lot sizes. The Site is well-positioned, building as it does on an existing township well-serviced by public transport and cycling options, to provide good accessibility to jobs, community services, and open spaces, as well as mitigating climate change impacts and future natural hazards by being not near the coast and well removed from major rivers.

NPS-UD Policy 1

Planning decisions contribute to well functioning urban environments, which are urban environments that, as a minimum:	**Assessment**
(a) have or enable a variety of homes that: (i) meet the needs, in terms of type, price, and location, of different households; and (ii) enable Māori to express their cultural traditions and norms;	The proposal is to have larger lots supporting predominantly standalone dwellings and associated accessory buildings (including generous sized garaging) in an open landscaped garden setting. This will fill a gap in the range of housing typologies available at Rangiora and contribute to a better functioning urban environment overall at Rangiora. It is not necessary for each individual rezoning proposal to have a wide range of housing typologies, and in some circumstances this may not be appropriate. The rezoning will deliver a premier high amenity urban subdivision with generous sized lots which will complement existing and planned higher density residential development at west Rangiora. There is scope with the relief sought for a mix of residential densities. The appropriateness of this can be considered at the master planning/ODP stage. The Site has the potential to create a unique urban environment in Rangiora. It can follow the example of Palmview based on a lake or Kaiapoi Likes providing a niche housing option in Rangiora and the District meeting a need for residential land not constrained to GRZ standards.
(b) N/A business sectors	
(c) have good accessibility for all people between housing, jobs, community services,	The Site has access to a collector road and a strategic road providing easy access to key community amenities and facilities. The town is served by a public bus route to the city, and a cycle trail connecting to Kaiapoi and the City. The new West Rangiora Development Area adjoins the Site to the south. The Site will become closer to Rangiora public transport routes as they extend out to service this new growth area over time.

natural spaces, and open spaces, including by way of public or active transport; and	The Site is in walking distance to Arlington Park and the Rakahuri/Ashley which contains abundant recreations pace. It is easily accessible to the town centre and within walking distance to the Huntingdon Drive local centre.
(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and	The demand for housing and land in Rangiora is largely ahead of the planning means to respond. This proposal will "top up" the land presently set aside in the PWDP and provide a useful buffer to demand. The Site owners have been keen to release this land for more intense development for some time; there is no prospect of land banking.
(e) support reductions in greenhouse gas emissions; and	The Site has significant advantages in being easily accessible to the town centre and reserves, community facilities and schools. The proposal retains a consolidated form to Rangiora with good connectivity and linkages to recreation space and commercial centres reducing the need for car travel.
(f) are resilient to the likely current and future effects of climate change	The Site is within the area of influence of a major river but the non-urban flood assessment maps do not show extensive flooding likely at the Site. Being inland it is not at risk from climate change induced extreme natural hazard events like sea level rise. or river flooding.

Effects on ecosystems and habitats

51. The Site is currently used for a mix of low intensity (grazing) farming, and lifestyle purposes. Shelter belts and utility buildings have been established
52. The Site has been identified in the PWDP with two ecological overlays (the PWDP ecological overlay – Plains and Low Plains Ecological District). They are a district-wide overlays and no specific ecological values have been identified in the Proposed Waimakariri District Plan. These overlays seek primarily to retain indigenous vegetation. The PWDP identifies SASM 025 nearby the Site. That is a Site and Area of Significance to Maori and in SASM - Schedule 1 is identified as *being River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species.*

Effects on natural and physical resources

53. The Site drains in a SE direction towards the newly developing residential area.
54. There will be a degree of site disturbance as part of creating the roading network, and reserves, and as part of curtilage development on each lot.
55. The proposed use for residential activity inevitably leads to loss of some rural productive potential as land owner intentions are not about farming or productive use of the land, but lifestyle use and enjoyment. Built forms and hard surfaces become more dominant.
56. The Site comprises 4ha bocks now and these are not able to be used effectively for productive purposes other than for intensive productions based on tunnel housing and other supported production systems. None exist in the Site now.
57. The Site contains Class 2 and Class 3 soils as defined in the NZ Land Use Inventory (Landcare Research) Land Use Capability classes 1-3 **(Figure 10)**. Productive use of these soils other than for low level purposes i.e. grazing, is not feasible given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production).

Figure 10: Site soils: Site outlined in red; (Canterbury Maps)
Class 2 soils: bright green/Class 3 soils: light green;

Discharges of contaminants into the environment
58. There will be no discharges of contaminants into the environment. Wastewater will discharge to the Council's reticulated system.
59. Stormwater discharges will potentially be to ground given ground conditions or to an approved and consented stormwater management and treatment area which will meet all relevant Council standards.

Risks from natural hazards or hazardous installations
60. The PWDP planning maps show the Site as being within a Non-Urban Flood Assessment Area.
61. The District Plan maps do not identify high flood hazard areas or high coastal flood hazard areas, rather these are identified through the flood assessment certification process. This enables the most up-to-date technical information to be used. However, as a guide, areas that are potentially high hazard can be identified through the Waimakariri District Natural Hazards Interactive Viewer (NH - Introduction).
62. Rules that refer to a Flood Assessment Certificate require a certificate to be obtained from the District Council to determine compliance with the relevant rule. The alternative is to apply for resource consent as set out in the rule.

63. Rule NH-R2 states
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;

64. Assessment of flood risk and consequence can be undertaken at subdivision stage.
65. There will be no hazardous installations proposed on the Site.

Geotechnical assessment
66. The PWDP planning maps show the Site as being "Liquefaction damage is unlikely. Standard investigation procedure outlined in NZS3604 is appropriate".

Contaminated land
67. A Preliminary Site Investigation can be carried out for the Site at subdivision stage.
68. An enquiry of ECAN has identified that two sites at the northern end of the Site potentially contain some contaminated land, which can be investigated further at subdivision stage **(Appendix 6)**. 315 Lehmans Road is an unverified HAIL site (previous use for clay target shooting) and 317 is registered as containing uninvestigated persistent pesticide bulk storage.

Servicing
69. Proposals for servicing the Site and the effects from such servicing in relation to domestic water supply, wastewater, stormwater, roading, and telecommunications will be required for any subdivision consent.

Economic effects
70. It is anticipated that urban development will generate positive economic effects, both from the investigation/development phase and for the longer run economic activity from householders participating in the local economy.

Climate Change effects
71. An assessment of the effects of the proposed rezoning on climate change is included as part of the assessment of a well-functioning urban environment above.
72. A well-functioning urban area that is designed and serviced in an integrated manner, applying sound urban design principles, will enable a reduction in greenhouse gas emissions compared to unplanned, ad hoc development that does not create compact urban forms located where the services and benefits of existing, established urban areas are not readily accessible.
73. There is a triangle of planning influence that can be brought to bear on reducing greenhouse gas emissions
a) Compact urban form minimising distances between homes and work/play options.
b) Proximity of homes to community facilities, services and amenities and business/work areas.
c) Design and provision of movement corridors and linkages that create opportunities other than for vehicles for getting

around.
74. The Site of the proposed rezoning:
a) Helps in retaining a compact urban form to Rangiora.
b) Is easily accessible to the town centre and is located convenient to the recreation resources of the nearby Rakahuri/Ashley River, the airfield and racecourse and Arlington Park.
75. Rangiora has excellent connectivity to the City, both via the Northern Motorway, the new Northern Corridor, a cycle way link to Kaiapoi which is linked to the new north city cycle way along the Northern Corridor and a very regular bus service.

Positive effects
76. The proposed rezoning will provide for the continued growth of Rangiora by managing the development through an ODP. The proposal will provide a buffer to on-going high level demand for lots in Rangiora. It will cater for a specific housing need not found in GRZ Zoned land nor LLRZ land. The proposed rezoning is anticipating a form of development that is a much more efficient use of a qualifying site supporting a well-functioning urban area. It is a positive endorsement of Rangiora as a growth node in the District.
77. The benefits derived from a planned ODP approach include facilitating high levels of connectivity, creating community links to identified focal points. The Site is close to recreation facilities. A coordinated and integrated development will provide a distinctive environmental quality and point of difference to the development.
78. The Site adjoins existing and developing residential development on the western edge of Rangiora.
79. From a community well-being perspective, the provision of additional land for residential growth will continue to support the Council's investment in community infrastructure by maintaining and facilitating growth rates, increasing the rating base and attracting development contributions.

STATUTORY PLANNING ASSESSMENT
80. Submissions must be assessed under the provisions of the RMA, including Part 2 and Section 32 (Requirements for Preparing Evaluation Reports).

National Policy Statements
National Policy Statement on Urban Development Capacity (NPS-UD)

81. The NPS–UD applies to this proposal as it is directed at Tier 1 urban environments, and
Tier 1 local authorities which includes Waimakariri District as part of the Christchurch urban environment that is defined in Table 1 of the NPS, and additionally defined as:
any area of land (regardless of size, and irrespective of local authority or statistical boundaries)
that: is, or is intended to be, predominantly urban in character; and is, or is intended to be, part of
a housing and labour market of at least 10,000 people.
82. The NPS-UD recognises the national significance of:
a) Having well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future; and
b) Providing sufficient development capacity to meet the different needs of people and communities.
83. The NPS outcomes are to be achieved through objectives that address:
a) Planning decisions improving housing affordability by supporting competitive land and development markets.
b) Regional policy statements and district plans enabling more people to live in areas of urban environments near centres or areas with employment opportunities, area well serviced by public transport or a high demand for housing in the area.
c) Urban environments developing and changing over time in response to diverse and changing needs of people, communities and future generations.
d) Local authority decisions on urban development being integrated with infrastructure planning and are strategic over the medium term and long term.
e) Local authority decisions on urban development are responsive particularly for proposals supplying significant development capacity.
f) New Zealand's urban environments support reductions in greenhouse emissions and are resilient to current and future effects of climate change.
84. The key method to achieve these objectives is by development of a Future Development Strategy (FDS). This will set out how the Councils will provide for sufficient development capacity over the next 30 years to meet expected demand. There is no FDS for the greater Christchurch Urban Area that meets the requirements of the NPS-UD.
85. Work on development capacity completed for the NPS - UDC 2016 by the Greater Christchurch Partnership as an Update of the existing Urban Development Strategy (UDS) – Our Space 2019 confirmed what there was a shortage of feasible development capacity for future housing in Waimakariri District for the medium (next 10 years) and long term (10 to 30 years) periods. That assessment is now out of date as it does not address the requirements of the NPS-UD; and rates of take up of land have exceeded projected rates.

86. One of the key changes in the NPS-UD is that local authority decisions on urban development that affects urban environments are responsive, particularly to proposals that would supply significant additional capacity. It also amends the required methodology for housing and business capacity assessments.
87. The current CRPS does not meet the new NPS-UD requirement in relation to proposals for significant additional capacity. Regional councils are required to include criteria in the RPS to determine what plan changes will be treated for the purposes of Policy 8 as adding significantly to development capacity as soon as practicable. ECAN has yet to respond to this requirement.
88. The NPS-UD has immediate effect, so in the meantime, proposals such as this submission must be assessed in the context of the overall intent and purpose of the NPSUD as articulated in the NPS-UD objectives and policies. This includes that NZ has well-functioning environments; provides sufficient development capacity to meet the different needs of people and communities; planning decisions improve housing affordability to contributing to competitive house and land markets; and RMA plans enable more people to live near major employment areas, where there is existing or planned public transport, and where there is high demand for housing.
89. The NPS-UD is the higher order document and its requirements override those of lower order documents where there is a conflict, including regional and district RMA plans.
90. Key objectives and policies in the NPS-UD are assessed here:

NPS-UD Objective/Policy	**Assessment**
Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	The proposed development will further enable Rangiora to sustain itself as a well-functioning urban environment by consolidating the residential area close to the town centre, and provide residential development close to public transport links and existing community and commercial facilities including Huntingdon Drive local centre.
Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.	The proposal provides choices in the Rangiora housing market and in doing so supports housing affordability. Whilst the proposal is for a premier larger lot urban residential development, it is important that all sectors of the market are catered for. This will be more affordable than forcing those wanting large sections out to the much larger and very limited areas of LLR D1 development, or having to purchase 2-3 sections in a standard residential subdivision. There Site is in multiple ownership and the landowners are working together to achieve the rezoning. It will bring more competition into the market by bringing new entrants into the market.
Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply: the area is in or near a centre zone or other area with many employment opportunities the area is well-serviced by existing or planned public transport there is high demand for housing or for business land in the area, relative to other areas within the urban environment.	The CRPS is due for review in 2024 but in the meantime the existing CRPS is not in accordance with the NPS-UD 2020. The proposed rezoning is on the edge of the District's largest centre, which offers a wide range of community and business services, and employment opportunities. It is expected that a proportion of future residents will commute outside the township, but as the township and associated business areas e.g. at Southbrook, continue to grow, this is expected to become proportionally less. Rangiora is well serviced with public transport, there is scope for future mass transit PP, and there is a high demand for housing at Rangiora. The Site adjoins the new West Rangiora Development Area, to the south. Extensions of public transport to service this growth area will be readily accessible to the Site.
Objective 6: Local authority decisions on urban development that affect urban environments are: integrated with infrastructure planning and funding decisions; and strategic over the medium term and long term; and responsive,	Whilst not currently identified as a future growth area in RMA documents, the Site is well placed at the township edge to be serviced by existing infrastructure. Some upgrades may be required, which will be investigated further with Council prior to the hearing. See Policy 8 below for commentary on proposals which supply

particularly in relation to proposals that would supply significant development capacity.	significant development capacity
Objective 8: New Zealand's urban environments: support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change	The proposal adjoins the existing built up are of Rangiora, close to public transport links. Its excellent accessibility to Christchurch City, substantially enhanced with the new Northern Motorway extensions, means it is now highly accessible to these nearby major employment areas. Travel distances are relatively short, minimising vehicle miles and the potential for greenhouse gas emissions. There is a cycleway link from into Christchurch City, and regular bus services, including an express route. The Site is inland and not subject to natural hazard risks associated with sea level rise arising from climate change.
Policy 1 – Planning decisions for well-functioning urban environments	Assessed at para 41-50
Policy 2 - Sufficient development capacity Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.	The proposed rezoning is anticipated to provide sections that will be available for the short term (up to 3 years) and into the medium term (3-10 years) if adopting a more conservative outlook. The locational and amenity advantages of Rangiora also favour strong ongoing demand. The PWDP UFD-O1 Feasible Development Capacity for residential activities identifies the need for 6300 residential units in the period 2018-2028, and 7100 residential units 2028-2048. These numbers are derived from Chapter 6 CRPS Table 6.1. and are out of date. Data from the Council (November 2021) confirms that there are about 800 vacant lots in Rangiora. Building consents are at about 180/year. That means there is about 4 years vacant land supply. A lead in time of 3-5 years is needed to go from rezone to house build so the Council is facing an unnecessary squeeze on land availability. That will translate in to an upward shift in land and section prices as has been the case at Rolleston. The data suggests that the PWDP will be late to the party to ensure there is at least sufficient development capacity to meet expected demand for housing land over the short term, medium term, and long term. There is a looming, inevitable land supply issue so any proposal to add capacity will push the Council closer to meeting the requirements of the NPS-UD. The proposal is consistent with ensuring there is at least sufficient land supply for housing.
Policy 8 – Responsiveness to plan changes Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is: (a) unanticipated by RMA planning	The proposed rezoning is not anticipated by RMA documents - it is not a Greenfield Priority or Future Development Area in the CRPS, or a New Development area in the PWDP. A responsive approach to the proposal is required as it meets the Policy 8 criteria for unanticipated zoning. It will contribution to well functioning urban environments and will add significant development capacity. There is no development capacity for the housing typology proposed – so any provision is significant in this context. The development will deliver appx 311 high amenity large lot residential sites at an average density of 1500m2. This will be higher if a mix

documents; or
(b) out-of-sequence with planned land release

of densities are proposed, which may be appropriate in some parts of the Site, dependent on master planning work to follow.

91. Adopting the submission to re-zone the land, and enable the proposed development on the submission Site will satisfy the objectives and policies of the NPS-UD.

Proposed National Policy Statement for Highly Productive Land (NPS-HPL)

92. The Government proposed in 2019 a NPS-HPL to prevent the loss of productive land and promote its sustainable management. The overall purpose of the proposed NPS-HPL is to improve the way highly-productive land is managed under the Resource Management Act 1991 (RMA) to:

a) Recognise the full range of values and benefits associated with its use for primary production
b) Maintain its availability for primary production for future generations
c) Protect it from inappropriate subdivision, use, and development.

93. The NPS-HPL is still a proposal and not intended to take effect until after Gazettal. At the date of this submission the NPS-HPL has no effect and no assessment of it is required for the purposes of this submission.

94. The Proposed NPS-HPL interim definition of HPL is land defined as Land Use Capability Class 1-3 soils. A portion of the Site contains Class 2 and 3 soils (see **Figure 10)**. Highly productive use of these soils is not realistic given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production). Its present use as lifestyle blocks, low level grazing and agistment is the more likely long run use of the Site if not rezoned.

95. Objective 3 of the Proposed NPS-HPL specifically refers to highly productive soils being protected by avoiding *"uncoordinated urban expansion on highly productive land that has not been subject to a strategic planning process"*. The Site was assessed through a strategic planning process (WDDS 2018) and the RRS as a preferred site for LLRZ development, and rejected for a change in zoning on the basis that it may be required for long term urban growth of Rangiora.

96. It is therefore considered that this submission to re-zone the Site is largely in accordance with the Proposed NPS-HPL.

National Planning Standards

97. The National Planning standards prescribe various matters under the RMA so that there is consistency among planning documents most relevantly here in terms of appellations for zones, and the standards applying to these zones.

98. The proposed rezoning adopts the standard zone appellation, in this case LLRZ as contained in the PWDP.

99. The PWDP identifies plan standards for minimum and average net site areas for the respective zones. These are modified for the proposed rezoning as a higher density LLRZ.

100. The higher density LLR zoning is entirely consistent with the NPS purpose for the LLRZ as reproduced below. In this case, the principal constraint to more intensive development is the peri-urban location where a lower density transition to the rural environment is appropriate (particularly noting that the zone boundary is 'mid block' so there is no natural or physical buffer between rural and residential areas); the existing pattern of 4 ha lots with existing substantial homes and gardens; and the fact that the premier large lot subdivision proposed relies on consistency of housing quality and character to be deliver on this vision for the area.

Large lot residential zone

Areas used predominantly for residential activities and buildings such as detached houses on lots larger than those of the Low density residential and General residential zones, and where there are particular landscape characteristics, physical limitations or other constraints to more intensive development.

Low density residential zone

Areas used predominantly for residential activities and buildings consistent with a suburban scale and subdivision pattern, such as one to two storey houses with yards and landscaping, and other compatible activities.[2]

Canterbury Regional Policy Statement 2013 (CRPS)

101. Chapter 6 of the RPS *"provides a resource management framework for the recovery of Greater Christchurch, to enable and support recovery and rebuilding, including restoration and enhancement, for the area through to 2028. Recovery in Greater Christchurch is also supported by the provisions in Chapter 5 notated as 'Entire Region'. The provisions in the remainder of the RPS also apply.3"*

102. An assessment of the proposed rezoning against the relevant CRPS Objectives and Policies is set out in **Appendix 1**. This should be read in the context of the CRPS being overdue for review and that it does not provide a regional response to the NPS-

UD. The
need to focus on earthquake recovery has now passed and so many of the directive provisions need to be given appropriate 'weight' in a new national policy environment with a focus on flexible, responsive panning approaches that better provide for people's needs and well-being.

103. That assessment shows that

a) The development proposal achieves the objectives for the location, design and function of new developments (Objective 5.2.1)

b) The traffic effects of the proposal are unlikely to give rise to adverse effects and so achieves CRPS objectives for the strategic land transport network (Policy 5.3.7)

c) The Site falls outside the FDAs shown on Map A of Chapter 6 and in that regard is inconsistent with RPS Policy 6.2.1 clauses 1 to 3.

1. identifies priority areas for urban development within Greater Christchurch;

2. identifies Key Activity Centres which provide a focus for high quality, and, where appropriate, mixed-use development that incorporates the principles of good urban design;

3. avoids urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS

d) The environmental effects assessment outlined above establish that the proposed development is consistent and will not give rise to any concerns with respect to all the matters listed in RPS Policy 6.2.1 clauses 4. to 11. These matters are:

6.2.1 Recovery framework

Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that:

1. As above;

2. As above;

3. As above;

4. protects outstanding natural features and landscapes including those within the Port Hills from inappropriate subdivision, use and development;

5. protects and enhances indigenous biodiversity and public space;

6. maintains or improves the quantity and quality of water in groundwater aquifers and surface waterbodies, and quality of ambient air;

7. maintains the character and amenity of rural areas and settlements;

8. protects people from unacceptable risk from natural hazards and the effects of sea-level rise;

9. integrates strategic and other infrastructure and services with land use development;

10. achieves development that does not adversely affect the efficient operation, use, development, appropriate upgrade, and future planning of strategic infrastructure and freight hubs;

11. optimises use of existing infrastructure; and

12. N/A

e) The proposed rezoning achieves policies relating to:

- Sustainability;
- Integration of transport infrastructure and land use;
- Urban design; and
- Biodiversity, natural hazards, landscape, soils, contaminated land.

104. In terms of the CRPS polices for rural residential developments (Policy 6.3.9) the proposal sits square with all policy matters other than being a location identified in an adopted Rural Residential Strategy; and being at a higher density than provided for under this policy (ie greater than 1-2 hh/ha). As such it has a majority of features entirely consistent with the policy.

105. The CRPS includes housing capacity targets as below

6.2.1a Targets for sufficient, feasible development capacity for housing [inserted in accordance with sections 55(2) and 55(A) of the Resource Management Act 1991, from the National Policy Statement on Urban Development Capacity 2016]

For the period 2018-2048, sufficient, feasible development capacity for housing is enabled in Greater Christchurch in accordance with Table 6.1.

Table 6.1 Targets for housing development capacity in Greater Christchurch, 2018-2048

106. These derive from Our Space, under the requirements of the then NPS-Urban Development Capacity 2016, since replaced by the NPS-UD 2020. The targets (known as bottomlines in the NPS-UD) are to be treated as 'minimums' not 'maximums'.

Policy 6.3.12
enables urban development in the Rangiora and Kaiapoi FDAs (new Development Areas in the PWDP) where needed to meet the medium term targets. This a 'minimum' allocation approach contrary to the NPS-UD. The NPS-UD favours over allocation, including in locations unanticipated by RMA plans, where it will add additional development capacity, can be integrated with infrastructure planning and funding, and will contribute to well functioning urban environments – as is the case the proposed Lehmans LLR D2 zone.
107. The proposed Lehmans LLR D2 zone is consistent with the CRPS except with respect to those parts of the CRPS which are out of step with and do not give effect to the higher order plan, the NPS-UD.

Proposed Waimakariri District Plan
108. An assessment of this proposal against the relevant PWDP Objectives and Policies for urban growth and development as notified on 17 September 2021 is set out in **Appendix 2.**
109. That assessment shows that the proposed rezoning is entirely consistent with the relevant objectives and policies, including as sought to be amended by this submission. Those amendments are to UFD-P3 Identification/location and extension of Large Lot Residential Zone areas; and LLRZ-O1 and LLRZ- P1-5 and reflect the intent and outcomes intended for the proposed LLRZ D2 zone, which is a higher density LLRZ zone than the PWDP LLRZ zone (renamed LLRZ D1 in this submission).

ASSESSMENT AGAINST OTHER PLANNING DOCUMENTS
Our Space 2018-2048 Greater Christchurch Settlement Update (2019)
110. Our Space is a non-statutory document prepared under the Local Government Act. It
"responds to the new Government Policy Statement on Land Transport, which has increased funding for mass public transit schemes, and meets the requirement of the National Policy Statement on Urban Development Capacity (NPS-UDC) 2016 to prepare a
future development strategy…. Specifically, it:
• sets out how targets for housing for the next 30 years will be met, accommodating an additional 150,000 people;
• identifies locations for housing growth, encouraging Central City and suburban centre living while providing for township growth in Rolleston, Rangiora and Kaiapoi;…
• promotes a compact urban form, which provides for efficient transport and locates development in a manner that takes into account climate change and sea level rise.[4].

..Underpinning this settlement pattern approach is the vision for a transformation of the transport network that fosters much greater public and active transport usage, and reduced reliance on the private vehicle.
111. Our Space acknowledges that this will require commitment from the Government to invest in the necessary improvements to our transport system, which could include investing in rapid transit services. To date, there has been no successful business case for improved public transportation, including not as a Covid 19 fast track infrastructure project.
112. The Our Space housing capacity targets (Table 3) and Future Development Areas are related to growth of urban areas.
113. Our Space, like the CRPS (and the Operative District Plan) are now out of date, as they do not reflect or give effect to the new requirements of the NPS-UD.

Waimakariri 2048 District Development Strategy (WDDS)
114. The preferred growth directions for Rangiora in the WDDS 2048 (2018) are outlined above (under 'Site') i.e. westwards to Lehmans Road, and otherwise eastwards. However, the Council in its decision on the RRS, recognized west of Lehmmans Road as a potential longer town urban growth area.
115. The WDDS Rangiora Snapshot (pp38-39) -when looking ahead to 2048 proposed that:
a) Rangiora remains the District's largest town
b) 30,000 – estimated population (2048)
c) 12,025 – estimated households
d) 5,025 - new households in Rangiora
e) Continues to accommodate one third of the District's residential growth
f) 167 – estimated annual building consents for new dwellings for the next 30 years
g) 423 hectares of additional feasible residential land required by 2048 (this includes capacity in remaining stages of existing residential developments as well as new greenfield areas inside and outside of the Infrastructure Boundary)
h) Future residential growth directions proposed to the east (predominantly) and west of the current town
i) Opportunities for intensification/regeneration to be identified
j) New growth directions take into account areas of unacceptable natural hazard risk and areas of significant environmental and cultural values
k) New growth areas to connect into existing sewer and water networks

l) Stormwater Levels of Service designed to meet increased performance requirements

116. At the 2018 Census Rangiora had a population of 17,841, and 7314 total dwellings (incl those unoccupied and under construction). Population projections for the District show an average annual change 2018-2020 of 1700 persons. If Rangiora continues to attract a third of all district growth as stated in the WDSS then Rangiora's population in 2021 will be around 18,900.

Mahaanui Iwi Management Plan

117. Part 1 of the PWDP in a section "Mana Whenua" sets out the position with respect to iwi and the review of the district Plan:

a) The District's territorial area sits within the takiwā (territory) of Ngāi Tūāhuriri which is one of eighteen Ngāi Tahu regional papatipu rūnanga, constituted under the ***Te Rūnanga o Ngāi Tahu Act 1996*** *to represent* ***mana whenua*** *interests.*

b) The preparation and change of a district plan must take into account relevant iwi documents. For the District, Ngāi Tahu has set out its resource management values, issues, objectives and policies within the Mahaanui Iwi Management Plan (2013).

c) The Mahaanui Iwi Management Plan identifies objectives, issues and policies for natural resource and environmental management for six pāpatipu rūnanga (including Te Ngāi Tūāhuriri Rūnanga). It seeks to ensure that the taonga and resources of Ngāi

Tahu mana whenua are recognised and protected in the decision-making of statutory agencies. The Mahaanui Iwi Management Plan contains a comprehensive suite of policies and objectives addressing the range of resource management matters of significance to tangata whenua. The District Council shall have regard to the Mahaanui Iwi Management Plan when preparing or changing the District Plan, to the extent its content has a bearing on resource management issues of the District.

118. The Mahaanui Iwi Management Plan (MIMP) 2013 was released on 1 March 2013.

119. The MIMP is a tool for tangata whenua to express their identity as manawhenua and their objectives as kaitiaki, to protect their taonga and resources, and their relationships with these. The MIMP seeks to ensure that these taonga and resources are recognised and protected in the decision-making of agencies with statutory responsibilities to tangata whenua. Importantly it is also a tool that assists Papatipu Rūnanga representatives to articulate their values, issues and policy into statutory processes.

120. The MIMP includes both general objectives and policies about the management of land, air, and water, and also includes catchment specific objectives and policies.

121. Section 5.3 Wai Maori (pp77-98) contains an extensive discussion about tangata whenua rights and interests in freshwater. It provides a suite of Issues, Objectives and Policies for freshwater

122. Section 5.4 Papatuanuku (pp101-124) sets out the Ngai Tahu Subdivision and Development Guidelines that are to be read along-side objectives relating to:

a) Land use planning and management in the takiwā reflects the principle of Ki Uta Ki Tai. (from the mountains to the sea)

b) Rural and urban land use occurs in a manner that is consistent with land capability, the assimilative capacity of catchments and the limits and availability of water resources.

c) Inappropriate land use practices that have a significant and unacceptable effect on water quality and quantity are discontinued.

d) Ngāi Tahu has a prominent and influential role in urban planning and development.

e) Subdivision and development activities implement low impact, innovative and sustainable solutions to water, stormwater, waste and energy issues.

123. Section 5.5 Tane (pp127-137) includes objectives that focus on:

a) Regional policy, planning and decision making in the takiwā reflects the particular interest of Ngāi Tahu in indigenous biodiversity protection, and the importance of mahinga kai to Ngāi Tahu culture and traditions.

b) The customary right of Ngāi Tahu to engage in mahinga kai activity is recognised, protected and enhanced…

c) Customary use, and therefore mahinga kai, is given effect to as a first order priority for freshwater management in the takiwā.

124. Section 6.4 (pp213-224) addresses issues of particular significance to the lands and waters of the Waimakariri catchment within which the Site lies.

125. Relevant Objectives relating to urban development of land in that catchment include:

a) The natural "energy, vitality and life" of the Waimakariri River as a braided river is protected and restored.

b) The discharge of contaminants to the Waimakariri and its tributaries is eliminated.

c) Water quality and flows in the Waimakariri and its tributaries are improved to enable whānau and the wider community to have places they can go to swim and fish.

d) The mauri and mahinga kai values of the Waimakariri and its tributaries and associated springs, wetlands and lagoons are protected and restored; mō tātou, ā, mō kā uri ā muri ake nei.

126. A key issue relating to subdivision and development is that subdivision and development activities in the lower catchment

have the potential to adversely affect Ngāi Tahu values such as waterways, mahinga kai and sites of significance (Issue Wai4).
127. The proposal provides for full urban reticulation of the three waters and is consistent with the objectives and policies contained in Chapters 5.3 and 5.4 of the MIMP. The proposal does not preclude individual land owners from installing rainwater collection and use from roof areas at the time of building development.
128. The proposal has been designed taking into consideration the potential effect of resultant subdivision and development on the rivers and streams that flow into the lowland rivers.
129. Overall it is considered that the proposal will not have adverse impact on the cultural values of iwi as set out within the MIMP.

SECTION 32 ASSESSMENT

130. A Section 32 assessment is contained in **Appendix 3.**
131. In summary, the PWDP zoning and associated rules (RLZ Zone with a minimum lot size for subdivision and a dwelling 4ha) do not meet the needs and aspirations of the current owners.
132. Strategic Council planning documents (specifically the WDDS) have a focus on only meeting urban growth demands within urban environments of existing towns. They favour intensification (15hh/ha) and a strict allocation of capacity by development areas. It is a control and command regime consistent with Map A of Chapter 6 of the CRPS but is out of step with the requirements of the NPS-UD which requires a more flexible, responsive approach, prohibits a hard fixed unmoveable urban/rural boundary.
133. This approach leaves little room for new proposals or proposals that do not sit square with the standard array of GRZ/medium density or SETZ (Settlement Zone). SETZ applies to some of the District's smaller settlements outside Greater Christchurch.
134. Neither LRZ nor Large Lot Residential (LLRZ) as notified in the PWDP is an efficient use of this block of land located as it is immediately adjoining the urban area of Rangiora, and in a location easily accessible to the town centre by active transport modes as well as car and several district reserves.
135. If this Site is not zoned for LLRZ D2 (minimum average lot size 1500m^2) use to enable residential re-development then it will drive pressure to re-zone elsewhere. That step potentially will not have the significant benefits to Rangiora long term in relation to enabling a well-functioning urban environment that enables people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future. Additionally re-zoning to LLRZ D2 will contribute to providing additional development capacity to meet the different needs of people and communities in a planned manner and consistent with the NPS-UD.
136. The Site can readily be developed to reflect the principles of the Urban Design Protocol with values of character, context, and connectivity.
137. The Section 32 assessment concludes that the proposal to re-zone the Site from LRZ zone to LLRZ D2 Zone (average lot size 1500m_2) is the most appropriate method for achieving the objectives of the proposal, than the other alternatives considered.
138. Option 2 identified in the s 32 assessment is consistent with some PWDP policies notwithstanding that it does sit square with the strategic intentions signaled in the WDDS and the PWDP approach to providing for development capacity and urban development.
139. Option 2 identified in the s 32 assessment to re-zone the Site is the most appropriate given:
a) The proposals adopt the PWDP zones, development and activity standards with appropriate amendments. This ensures continuity of the District Plan anticipated environmental outcomes and urban amenity for Rangiora and adjoining residential areas;
b) Will be consistent with and give effect to many of the relevant PWDP objectives and policies;
c) It is a logical extension to the developed and developing residential land adjoining the Site while achieving a compact, efficient urban form that removes pressure on isolated rural land elsewhere around Rangiora.
d) It gives effect to the NPS-UD, specifically Objective 6 c) and Policy 8, delivering significant additional development capacity and contributing to a well functioning urban environment.
e) It is assumed that there will be capacity in the public utilities and the existing road network, including planned upgrades, to accommodate the traffic effects of the redevelopment;
f) The proposed Site specific ODP will provide certainty of the final form and disposition of the re-zoned area including its proposals for reserves, roading, future linkages for pedestrian and vehicular traffic.
140. The re-zoning proposal is considered to be appropriate to achieve the sustainable growth and development of Rangiora.
141. The economic, social and environmental benefits of the proposed rezoning outweigh any potential costs.
142. The overall efficiency and effectiveness of the proposed rezoning (Option 2) is high, in comparison to the alternative options set out in the s 32 Assessment which are low (Options One and Four) or low to moderate (Option Three).
143. The PWDP proposes to release land for development in the new Development Areas at Rangiora and Kaiapoi through a novel and untested certification process that is not clearly derived from RMA statutory powers, nor Local Government Act 2002 (LGA) authority. This approach is not proposed for the LLR Overlay areas. As the proposed Lehmans Road LLR D2 zone proposed by this submission seeks large lot urban densities, it is anticipated that Council may favour the certification process if it accepts the proposed rezoning. This is opposed – rezoning to LLRZ D2 is sought.
144. Potential difficulties with the proposed certification process are identified and discussed in the Section 32 Assessment.

(**Appendix 3)**. In summary, the process is hugely discretionary, does not provide conventional rights to an applicant (eg right of objection/appeal) meaning decisions cannot be challenged, and it is not apparent that the process will be appropriately documented with a transparent record of the decision-making within the certification process. Further uncertainty arises in the practicalities of how to negotiate and manage the staging, funding and building of key infrastructure across a range of Sites, and a risk that land supply is controlled by a limited number of large developers. It is a far less efficient and effective method for delivering land for housing than the Council rezoning the land in the PWDP.
145. The proposed rezoning is considered to be the most appropriate, efficient and effective means of achieving the purpose of the RMA.

CONSULTATION
146. The landowners and their consultants have submitted on the WRRS and the WDDS (**Appendix 4)**.
147. The submissions to re-zone as rural residential or identify the Site as suitable for LLRZ have been rejected as noted above. LLRZ but at higher densities as now proposed is considered to be a more efficient use of the land and better meets market demand. 5000m^2 sites provide more land is needed for a spacious home and garden.
148. The landowners have been consistent in their wish to find a zone and possible land uses better suited to their needs.

CONCLUSION

173 The submission seeks to rezone 58 ha of land adjoining Rangiora from Lifestyle Rural Zone (LRZ) to Large Lot Residential with a specific density standard (LLRZ D1), minimum average lot size 1500m^2.
149. The Site has a long history of rural lifestyle use. It is not significantly restricted by potential natural hazards especially flooding, nor does it have physical limitations for development for residential purposes as it is not liquefaction prone, and has no known geotechnical limitations but does contain an area of LUC 2 soils. It is near a site of significance to iwi (SASM – 025) being the Rakahuri/Ashley River The Site has access to a collector road and is near to a strategic road giving direct access to the town centre and a range of community amenities and facilities.
150. The Site immediately adjoins the urban area of Rangiora, and is well located to join in to Council utility services. It is well suited for conversion to residential use.
151. The Site is not identified within the westward growth direction for Rangiora in the District Development Strategy 2018 nor is it part of the DEV-WR development area which adopts Lehmans Road as its western boundary. It is in a location that achieves coherent and compact urban form offering ease of access to business services, community facilities, reserves and the primary road network.
152. The proposed rezoning provides for a connected and high amenity residential living environment not presently available under the PWDP while avoiding and/or mitigating any potential adverse effects on the environment. It will provide for continuing high demand for a variety of high quality residential sections aimed at a particular segment of the housing market in an ideal location, easily accessible to the existing town centre services and facilities. It will broaden the range of housing available. As such, it is consistent with the NPS-UD including Objective 6c) and Policy 8, to be responsive to proposals which supply significant development capacity and contribute to a well functioning urban environment.
153. The use of this Site for residential purposes can be a sustainable and efficient use of land and infrastructure. The proposed rezoning better provides for the social, economic, environmental well-being of the landowners and the Rangiora community than continuation of the current low intensity lifestyle land use on 4ha blocks, or a conventional LLRZ residential use.
154. Any potential adverse effects of the implementation of the proposed rezoning can be assessed at subdivision stage but there has been no restriction on servicing the blocks to date. Capacity will need to be confirmed for infrastructure, power and road network. Any future subdivision of the Site will need to confirm water supply and wastewater treatment and disposal options.
155. Rezoning of the site to LLRZ zone is not inconsistent with the policies and objectives of the PWDP, but it is at odds with the dated CRPS approach to provision of urban growth and housing capacity for Greater Christchurch, to the extent that it is not within an FDA created by Change 1 to the CRPS and is not identified as an LLRZ site under the strategic RRS prepared by the Council.
156. As the proposal helps achieve the purpose of the RMA, and has been shown to be consistent with the relevant provisions of the NPS-UD, the submission can be accepted by Waimakariri District Council.

Original Submission

Summary Reasons for the Submission

The reasons for our submission are outlined below.
a) The preferred relief (**the proposed rezoning**) is both appropriate and necessary to achieve sustainable growth and

development of Rangiora and the District and meet the requirements of the National Policy Statement for Urban Development 2020 (**NPS-UD**).

b) The Site identified in Figure 1 and at para 1 of the Preferred Relief above is a logical and preferred location that lends itself to a specific type of housing development not provided within the PWDP as a residential option adjoining but outside the existing urban areas. Nowhere is it possible to develop in a comprehensive, coordinated way a low density, high quality residential environment in the District's towns, the Rural Lifestyle Zone or Settlement Zone as a permitted activity.

c) The requirement for 12/15 hh/ha in GRZ zones (the majority of land in urban areas) drives development to modern scale relatively small urban lots best produced as a package across a significant land holding. The GRZ subdivision standards do not provide for the needs of people who seek a generous sized urban lot residential setting. This is a housing sector that is running against the planning tide of intensification but is, nonetheless, a legitimate form of housing in an appropriate setting. The barriers to such development in urban areas requires an appropriate setting/ location in the rural areas but close to or adjoining the urban areas and at a much lower density than is desired or appropriate (the PWDP LLRZ) to meet the housing needs for generous sized urban lot residential living..

d) The PWDP subdivision standards for LLRZ require lots that are very large for those whose primary interest in a rural setting is a form of residential living, not one that requires significant maintenance and management often involving animals or machinery at scale. Conversely, the GRZ subdivision standards do not provide for the needs of people who seek a large lot residential setting

e) The focus in the PWDP is on prescribing a limited range of residential options and tightly controlling and constraining housing choice within those options. Further urban growth is also tightly constrained and controlled around DEV areas around Rangiora and Kaiapoi but for a very specific form of residential development driven off density requirements that do not match the needs of all landowners.

f) The focus in most new District Plans, driven in part by the National Planning standards, is to simplify the range of zones, to standardize lot sizes, to supposedly create efficiency and certainty through ease of administration of the District Plans. This is done by constraining housing and land development choices by lot size, by location, by built standards and the disposition of built/open elements in a site. However, the National Planning standards do provide for large lot urban residential living, a residential living option which has not been taken up the PWDP (due most likely to the restrictive provisions of the CRPS which only prescribe one from of lower density residential living, at a density of 1-2 hh/ha).

g) This planning approach may be a standard approach to resource allocation but it does not provide a flexible, responsive approach to innovative and new development options. The Government is creating policy settings that on one hand seek intensification in urban areas, while at the same time pushing away from a land allocation model of planning. The PWDP in striving to face both policy directions has a package of measures that are in fact a major barrier in terms or cost, timeframes and certainties for proposals that are not cut from the suite of housing and development options set out by the PWDP. The allocation of land in preferred development areas, it must be said, runs counter to the Government's push, and now its direction, to free up land for development, to encourage innovation in housing (presently with a focus of intensification) and to make available a range of responses to the need to meet the housing needs of people and communities set out in the NPS-UD.

h) While the weight of demand (and the planning response) is around affordable housing, around small lots and dense development that supports investment in public facilities and amenities such as public and active transport, reserves, and commercial services, there is always a wide spectrum of preferences at play in the housing market. The demand for high quality, generous houses set on generous sized parcels of land within high amenity settings is an important and no less relevant housing sector. There is a strong unmet demand, as confirmed by advice from Bayleys real estate (**Appendix 5**) for larger family homes with room for a pool or similar. Purchasers want to be close the amenities of Rangiora and within walking and cycling distance of local schools. They do not want the only available options – a 4 ha lifestyle block or 5000m^2 rural residential site at Mandeville or Ohoka.

i) Interestingly enough for a nation built on the so-called quarter acre paradise, recent policy and planning interest in housing and land development has now seemingly positioned the 1011m^2 section as a luxury item, as the antithesis of providing for community well-being and needs. It is as though the old quarter acre of itself acts against building a sense of community despite being able to be developed in a planned, structured, coordinated or integrated manner. Rather than being a frivolous discretionary item in land development
and housing choice, a well-planned, well located and properly serviced low density residential environment has much to offer urban environments. They can be tactically used to provide shape and edge to urban areas, they can provide a mass of amenity different from (and potentially complementary to), but no less legitimate in urban outcome terms, to conventional GRZ zoned land.

j) In many ways the approach of a district plan to the role and place of the old quarter acre is not dissimilar to the issues faced by comprehensive retirement villages when first proposed. The idea of dense, almost gated and self-contained communities, with multi storey buildings also did not sit well in many district plans. But now they are accepted as an important part of the urban fabric catering to a specific demographic and health demographic. Most plans enable them.

k) Provision for low density residential in an urban setting, or failing that likelihood, in an adjoining rural zone is a fundamental gap in the district plan.

l) The submission seeks to provide for another housing typology not provided in the PWDP and in a location with significant planning merit. The planning case was made out in a detailed submission to the proposed Rural Residential Strategy (**RRS**) for

the land identified in this submission to be “reserved” for conventional Rural Residential zoning in the review of the District Plan. That submission was rejected in favour of a decision ascribing an unspecific strategic significance to Lehmans Road as the urban boundary; simply the decision was that rural residential development here would preclude this area as a future urban growth path, even though this was likely to be very long term as the Waimakariri District Development Strategy (WDDS 2018) for the period up to 2048, does not favour urban growth west of Lehmans Road.
Officer Recommendation
Continue to exclude the area west of Lehmans Road and the racecourse land at Rangiora as growth areas as these were originally considered but not included in the draft RRDS as they trigger the key preliminary criteria of: being on the direct edges of a main town outside of the Projected Infrastructure Boundary (PIB) thereby foreclosing more intensive long-term urban development, and…

Panel Recommendation
The panel accepted the officer recommendations to exclude areas on the fringes of Rangiora in the final RRDS due to these having the potential to foreclose more intensive long-term urban development of the town.

m) In light of the above decision on the Waimakariri Rural Residential Strategy, the proposal now is for a form of high amenity low density urban zoning, which whilst in demand is entirely absent from the PWDP. This will be a long term urban form of development. The proposal set out in the submission will achieve a compact, and efficient, urban form on the edge of Rangiora with excellent connectivity by multiple transport modes. It provides for continuous urban development by enabling a built form which can act as a strong zone or urban boundary.

n) The proposed rezoning will accommodate approximately 311 LLRZ lots1 at the proposed amended density standards for LLRZ D2 (average size 1500m^2). It will contribute to a well-functioning urban environment, meeting the NPS-UD Objective 6(c).
o) Any adverse effects on the environment arising from the proposed rezoning will be minimal, if any, and can be adequately mitigated. A high amenity master planned development is proposed.
p) Significant positive effects arise from the proposed rezoning. It will enable the short term housing demand at Rangiora to be met, and can deliver a housing typology for which there is demand, on lots that are not a burden to the landowners (which is the case for 4ha and the very limited areas of LLRZ D1 with a density of 1-2 hh/ha) and for which there is no provision in the PWDP. At present rates of land uptake there is about 4 years vacant land supply in Rangiora. Given it takes 3-5 years to bring land from zoned state to on the market as developed lots, there is some urgency in providing additional capacity. This proposal helps address an anticipated shortfall in residential zoned plan enabled land.
q) There is no additional cost to the Council in re-zoning the Site as there is expected to be capacity in the public utilities and the existing road network, including planned upgrades.
r) Amendments to PWDP objectives and policies may be necessary to provide for a higher density LLRZ, but of themselves will not act against those relating to Strategic Directions Urban Form and Development and Urban Growth. The PWDP approach to zones and
identification of future development land is already out of step with higher order Resource Management Act 1991 (RMA) statutory documents because they do not give effect to the NPS-UD (and are sought to be amended through this submission).
s) The alternatives of retaining Rural Lifestyle or Large Lot Residential zone across the entire Site are not an efficient use of land which immediately adjoins the urban area of Rangiora, and is highly accessible to the town centre by active transport modes as well as car.
t) The proposed rezoning is consistent with and the most appropriate, efficient and effective means of achieving the purpose of the RMA.

The Site
1. The Site is a 58ha block of land (‘the Site’) accessed from Lehman Road, Rangiora **(Figure 1)**. It is owned by the two submitters and 12 other landowners.

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1 Assumes 20% of land area taken for servicing including roading, reserves and stormwater management if required.

Figure 1: The site (outlined in blue (Google Earth)

2. The Site is surrounded by RLZ land that is used for a mix of lifestyle and conventional farming. To the NE is the Rangiora Eco Holiday Park, and beyond the Park is the Rangiora Racecourse about 300m away from the nearest lot and 1km from the centre of the Site. Land to the south east is GRZ and part of urban Rangiora with newly developing residential land west of West Belt. About 1.9 km to the NW is Rangiora Airfield. About 1km north of the most northern lot is the Ashley River.
3. The southern-most lot in the proposal with the Rangiora Vet Clinic faces, but does not have access to Rangiora-Oxford Road (State Highway 72). This arterial road provides the main road connection in to the centre of the town. The well-established Fernside Rural residential area is about 2.5km west from the junction of Lehmans and Rangiora-Oxford Roads.

Figure 2: the site is a broader context (Site marked red)

4. The Site is not identified as lying within a preferred growth direction for Rangiora in the Waimakariri 2048 District Development Strategy (2018) (**WDDS**) **(Figure 3)**. No land west of Lehmans Road is included in the West Rangiora Development Area (**DEV-WR**) in the PWDP.

Figure 3: Figure 11 WDDS

5. The Council reviewed its strategic approach to the location and provision of Rural Residential land (now zoned LLRZ in the PWDP) in the WDSS. It adopted the position that it would:

a) Explore tools such as cluster development to manage rural character

b) For rural residential development, adopt an approach that has a primary focus on creating new rural residential areas, with a secondary focus on enabling large lot intensification within existing rural residential areas where there is sufficient community support and servicing available

c) Review the Rural Residential Development Plan for the whole District (pg 21 WDDS).

6. Rangiora presently has a population of 17,841 (2018 Census). It grew steadily between 2006 and 2018. Growth of Rangiora since then has continued in step with the district growth which has increased 8.2% between 2018 and 2021 from 61,300 to 66,300 at an annual average of 2.8% from 2018 to 2020 (Statistics NZ Subnational population projections at 30 June 2021: provisional).

2006 (count)	2013 (count)	2018 (count)
12,165	15,069	17,841

Statistics NZ

Population projections at 30 June

PLANNING STATUS OF THE SITE

Chapter 6 of the Canterbury Regional Policy Statement

7. An assessment of the CRPS is set out in **Appendix 1** to this submission.
8. The Site is within the Greater Christchurch area.
9. It was not shown as a Greenfield Priority Area – Residential (GPA) on Map A of the Canterbury Regional Policy Statement (CRPS). The GPA terminates at Lehmans Road.
10. As a result of the Minister for the Environment's decision of 28 May 2021 on Change 1 to Chapter 6, an area largely south of Oxford Road and a finger of land to the north of Oxford Road was included as a Future Development Area (**FDA**) (**Figure 4** orange).

Figure 4: Map A Chapter 6 Regional Policy Statement Greenfield Priority areas
Site location identified with red circle (appx)

11. The FDAs are intended to accommodate the increased demand for new dwellings in that part of Waimakariri District within the Greater Christchurch Urban Area and to respond to the NPS-UD. They do not provide "plan enabled" land as they need to negotiate a rezoning process to confirm their status as land developable for housing and other urban purposes.
12. The proposal for a LLRZ zone with average lot sizes of 1500m2 is inconsistent with the policy approach of Chapter 6 for Greater Christchurch, in that if fits none of the residential living typologies provided for in Chapter 6 and is not in a location identified for urban or rural residential development. It sits 'between' the urban and rural residential densities provided for in the CRPS (minimum 10 hh/ha for urban in Waimakariri, and average 1-2 hh/ha for rural residential). The proposed density is appx. 6.66 hh/ha.
13. Notwithstanding, the proposal meets all the location and other criteria in CRPS Policy 6.3.9 for rural residential development. It is:

- Outside the CIAL noise contours
- Has some sites with restrictions from the take-off and landing vectors for Rangiora Airfield but not such as to impact its operational capacity.
- Is outside the groundwater protection zone
- Is not within the Waimakariri stop bank system
- Has no views of or to the Port Hills
- Has good access for emergency services
- Will not create reverse sensitivity issues with adjoining land uses; Rangiora Racecourse is 500m away.
- Free of significant natural hazards and is a flat site.
- Supports no significant natural values or ecological values.
- Contains no SASMs.
- Can be integrated into or consolidated with the existing urban area of west Rangiora.
- Contains no surface water bodies so there will be no adverse impacts on these.
- The development will be contingent on an ODP to provide integrated design for subdivision and land use, and provide for the long-term maintenance of a high quality high density rural residential character.
- The proposal is not intended as a staged development towards full urban; rather it is intended to provide a unique residential environment that can stand alone and contribute to the urban fabric of Rangiora like Palmview in east Rangiora, or as Kaiapoi Lakes does for Kaiapoi.

14. Overall, the proposal is not consistent with Chapter 6 but that is more a function of its original purpose when formulated in 2013. Notwithstanding that, the submission for a lower density residential focussed, high quality urban environment that attaches to an existing urban area and that promotes a coordinated pattern of development has planning merit.

Operative Waimakariri District Plan
15. The Site is zoned Rural in the Operative Plan. The minimum lot size for subdivision and a dwelling is 4 ha.
Proposed Waimakariri District Plan
16. The Site is zoned Rural Lifestyle Zone **(LRZ) (Figure 4).** The minimum lot size for subdivision and a dwelling in the LRZ is 4 ha.
17. Oxford Road is a strategic road and Lehmans Road is a collector road.

Figure 5: Proposed District Plan Zoning (site outlined in red)

18. The Site is also subject to, or potentially influenced by, a number of Overlays:
    a) Rangiora Airfield Take Off Climb and Approach Obstacle Limitation Surface (**Figure 6**)
    b) National Grid Transmission Lines (**Figure 6**)
    c) Liquefaction: Liquefaction damage is unlikely (**Figure 6**)
    d) Non-Urban Flood Assessment Area (**Figure 7**)
    e) Geographic areas: Ecological Area – Plains

f) Ecological District – Low Plains

Figure 6: Rangiora Airfield Take-off and Approach vectors (blue dashed lines); Liquefaction damage unlikely (green)Transmission lines (green lines); Site outlined in red

Figure 7: Non-urban flood assessment & Waimakariri Flood Hazard maps
Blue – medium risk, green – low risk, white – very low

DEVELOPMENT PROPOSAL AND PROPOSED REZONING

19. Subdivision of the Site will create approximately 311 LLRZ D2 lots.
20. The key design drivers for the proposal are:

a) A high amenity premier residential zone with large houses on large sites – average 1500m^2, min 1000m$_2$ based on the St Kilda, Hamilton development concept (**Figure 8**).

b) LLRZ D2 standards would enable a lower density zone in the medium term e.g. 10 years to achieve a high quality consistent character subdivision. If developed as an integrated development subject to an ODP subdivision can be staged for to the proposal.

c) Creating strong connections with the immediate neighbourhood by providing a cohesive interconnected roading layout that picks up direct links to the eastern neighbourhood off Lehmans Road and the northern subdivision roading, and carries them into the Site.

d) Creating a high amenity and diverse residential neighbourhood by providing interfaces to roads, reserves and rural environments.

e) Respecting and building on local identity and character of Rangiora by retaining specific vegetation features from the Site, and anchoring the development into the wider landscape.

21. A development concept can provide for sound urban design by:

a) A hierarchy of movement corridors.

b) Prioritisation of walking and cycling.

c) A north-south alignment of street blocks to maximize solar access and provide for efficient use of lots.

d) Block perimeters being kept as small as practicable to aid permeability and higher public amenity.

e) Enabling a range of housing typologies set in high quality landscape and street setting with generous amenity plantings and curtilage.

Figure 8: St Kilda development images (Bayleys)

22. St Kilda, Cambridge is a premier development on the outskirts of Cambridge, centrally located and with easy access to the Waikato Expressway. It was originally part of a small dairy operation which was dissected by the Waikato Expressway, leaving a portion within the Cambridge Town boundary and the larger balance of the property of approximately 80 ha (which became St Kilda) on the Eastern side of the Expressway, left in the Rural Zone.
23. The initial development concepts were for a Rural Residential type development given the Expressway separation of the existing residential development on the Western side of the Cambridge Bypass, however this was not supported by Council and a new concept of larger residential sections of a 1600m² average size was developed and approved – see https://www.stkilda.nz/page/location/

EFFECTS ON THE ENVIRONMENT

Township growth and urban form

24. The Site immediately adjoins the western edge of urban Rangiora.
25. The WDDS indicated a general preference for the direction of urban growth of Rangiora to the east as a way of balancing up the residential areas around the town centre and some growth to the west.
26. The approach of the WDDS was to signal growth options to be confirmed in the District Plan Review:

The broad directions for greenfield residential growth for the District's main towns are set out in Figures 11 to 14. Further work will be carried out to identify and confirm the exact locations and extent of these residential growth areas, together with the intensification opportunities within existing urban areas. These will be enabled through the District Plan Review and other planning tools.

27. The Strategic Planning documents clearly signal active consideration of growth needs and growth directions. The options available to the Council were constrained by the approach of the CRPS as the District Plan has to give effect to the CRPS and cannot be
inconsistent with it. The CRPS took effect in 2013 and is overdue for review.
28. The CRPS tightly holds urban growth to the constraints of Map A Chapter 6 and the identified FDAs which although amended by Plan Change 1 in 2020 does not respond to the directions of the NPS-UD. In any event the approach is focused on the need for housing in full urban residential land, less on other residential development forms.
29. As such the Site falls outside the planning policy framework for urban growth. However, in terms of urban form and on the ground, there is considerable merit and logic to conversion of this existing LRZ land to a new high amenity residential form that can be integrated into the Rangiora urban fabric.
30. The proposal has the potential to anticipate the longer term growth path confirmed by the decisions on the RRS to protect the future growth option of more intensive urban development in this direction. It can set a pathway to further westward expansion on land
that holds few if any physical barriers to land development.
31. The proposal will contribute to the housing needs of Rangiora and in a form and location that does not undermine the long run urban form of Rangiora. Planned growth confirmed in the PWDP is already intended to extend westwards out to Lehmans Road and to keep the town edge squared up providing depth to future development and providing a rational basis for providing movement networks driven off the key roads such as Rangiora-Oxford Roads. The West Rangiora Future Development Area confirms this approach. The Site sits in the next block west of Lehmans Road so is not proposing a disjointed urban form, nor one that is not part of the long term thinking of urban form and growth for Rangiora.

32. A full residential zoning is proposed under LLRZ D2 and will provide a high quality street character, overall amenity and passive surveillance over the street, and will create the correct lighting standards, roading standard, fully formed footpaths and cycleways required for a high quality urban environment.

Neighbourhood and wider community effects
33. The Site is serviced by a collector road and is close to an arterial road. This provides for ease of access and safe and convenient movement to and from the Site. A planned development co-ordinated by an ODP can facilitate within the site movement corridors and linkages through the Site to provide for walking and cycling.
34. A key positive neighbourhood and community effect will arise from the existing dwellings and their established gardens and plantings that will anchor new development and provide a point of reference for new dwellings. Development will not be on a bare site; it will take place in an existing established part-residential setting. The transition to a low density, high quality premier residential development will start from a favourable position and minimise the apparent extent and nature of the landscape change.
35. The Site is comparatively large (58.4 ha) and has the potential to support a variety of residential building typologies and this will contribute to a mix of households within the development and provide built form variety and interest in the streetscape. Whilst LLR D2 standards are proposed, it may be that part of the Site is suitable for other higher density forms of development, which would be within scope of the alternative relief, and could be considered as part of the master planning process required for preparation of an ODP (ahead of the hearing). The earlier stages of the St Kilda development were for large lot residential, with more clusters of townhouses included as later stages (and a retirement village). A retirement village is unlikely in this case, given the proximity of the Charles Upham Retirement Village.
36. Rangiora is well-positioned to accommodate and service the needs of a fast-growing resident population that will in turn support more business activity, schools, community facilities and community organisations.

Effects on tangata whenua values
37. The Proposed District Plan does not identify any Sites and Areas of Significance to Maori in the Site, but the nearby Rakahuri/Ashely River identified as SASM-025. This has been scheduled as being
River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species
38. The PWDP has Policy SASM-P8 which is relevant to pre-development processes:
Engagement with rūnanga
Te Ngāi Tūāhuriri Rūnanga and the District Council to encourage engagement with the Rūnanga priorto persons undertaking activities and/or applying for resource consent where the activity has thepotential to adversely affect identified sites or areas of Ngāi Tūāhuriri cultural significance. Where priorengagement with Te Ngāi Tūāhuriri Rūnanga h as not been undertaken by an applicant for an activitythat has the potential to adversely affect an identified site, the District Council will consult with the Rūnanga.
39. The Site is not listed as an archaeological site on the NZ Archaeological Site database.

Landscape and visual effects
40. Rural Lifestyle style development exists on the Site now (a series of 4 ha lots with a dwelling and associated accessory buildings on each). The landscape is dominated by shelter belts, utility buildings, significant trees and planted curtilages around

dwellings many of which are well set back off the roads down RoWs.
41. An ODP will help to achieve an integrated, cohesive and coherent development The proposal will lead to a modification of the landscape of the Site from a predominantly lifestyle block landscape to a denser semi-urban environment dominated by residential building that will, in time, get the benefit of street tree and reserve plantings and landscape treatments around the houses.
42. The visual effects which will arise from a change in the number of vegetative and built elements in the landscape are significant, but not avoidable, if the Site is to contribute to the on-going growth of Rangiora. The change will contribute to a high quality amenity and quality of environment and one that will be entirely consistent with and supportive of the rural lifestyle residential development that has successfully established on the Site.

Well-functioning urban environments
43. The Site adjoins the existing built up urban area of Rangiora. Immediately to the east are existing or developing residential areas.
44. The conversion of the Site from present rural lifestyle uses to low density, high quality residential will continue a pattern of outward expansion of Rangiora. Such a change may not be consistent with the PWDP's identification of a Future Development Overlay for west Rangiora only as far west as Lehmans Road, but on the ground it will look and integrate as part of the urban fabric.
45. It will provide some replacement lower density living areas for the existing LLR zones at north west Rangiora – but at much more appropriate higher density that the LLR D1 standard which is 1-2 hh/ha. There are two such areas, shown on the planning maps below. River Road has an 'urban overlay' and is intended to be intensified to urban densities. The land on the opposite (east) side of Lehmans Road is a 'legacy' rural residential zoning which applies under the Operative District Plan. The landowners have developed the adjoining residential subdivision and wish to develop the land for full urban residential development. Services are in place to support this. The constraint to date has been Map A of the CRPS which does not include the land as a Greenfield Priority Area or Future Development Area, GR zoning of this land is consistent with the NPS-UD.

Figure 9: PWDP as notified – LLRZs shown in light grey. Diagonal stripes – urban growth overlay.
Site outlined in red.
46. Rangiora is growing apace. It is attracting significant interest from new home buyers as people respond to the significant investment in upgraded transport links (Northern Corridor and public transport) and a growing economic base for employment within the District and the City.
47. Rangiora has excellent connectivity to the City, both via the new Northern Corridor, and a nascent cycleway link into the City. There is a very regular bus service every half hour.(the No 1 Blue Line) The standard trip takes 70 minutes, and there is a twice daily weekday morning express service from Rangiora, and seven times weekday express out to Rangiora all via Kaiapoi.
48. The Site will step out the western edge of Rangiora, but as it exists in a peri-urban form now, such a change does not alter how the Site interacts with Rangiora as a whole. It is in many ways a functional part of urban Rangiora now; it's only the Zone boundaries and policy framework that create the sense of it not being part of Rangiora.
49. The Site is convenient to the Rakihura/ Ashley recreation trails, the racecourse, Arlington Park, and the airfield. The town centre is easily accessible.
50. The following assessment of the criteria in the NPS-UD for determining a well-functioning urban environment shows that the proposed rezoning will deliver urban, housing and residential outcomes that meet those criteria. There will be a variety of homes enabled by generous lot sizes. The Site is well-positioned, building as it does on an existing township well-serviced by public transport and cycling options, to provide good accessibility to jobs, community services, and open spaces, as well as mitigating climate change impacts and future natural hazards by being not near the coast and well removed from major rivers.

NPS-UD Policy 1

Planning decisions contribute to well functioning urban environments, which are urban environments that, as a minimum:	**Assessment**

(a) have or enable a variety of homes that: (i) meet the needs, in terms of type, price, and location, of different households; and (ii) enable Māori to express their cultural traditions and norms;	The proposal is to have larger lots supporting predominantly standalone dwellings and associated accessory buildings (including generous sized garaging) in an open landscaped garden setting. This will fill a gap in the range of housing typologies available at Rangiora and contribute to a better functioning urban environment overall at Rangiora. It is not necessary for each individual rezoning proposal to have a wide range of housing typologies, and in some circumstances this may not be appropriate. The rezoning will deliver a premier high amenity urban subdivision with generous sized lots which will complement existing and planned higher density residential development at west Rangiora. There is scope with the relief sought for a mix of residential densities. The appropriateness of this can be considered at the master planning/ODP stage. The Site has the potential to create a unique urban environment in Rangiora. It can follow the example of Palmview based on a lake or Kaiapoi Likes providing a niche housing option in Rangiora and the District meeting a need for residential land not constrained to GRZ standards.
(b) N/A business sectors	
(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and	The Site has access to a collector road and a strategic road providing easy access to key community amenities and facilities. The town is served by a public bus route to the city, and a cycle trail connecting to Kaiapoi and the City. The new West Rangiora Development Area adjoins the Site to the south. The Site will become closer to Rangiora public transport routes as they extend out to service this new growth area over time. The Site is in walking distance to Arlington Park and the Rakahuri/Ashley which contains abundant recreations pace. It is easily accessible to the town centre and within walking distance to the Huntingdon Drive local centre.
(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and	The demand for housing and land in Rangiora is largely ahead of the planning means to respond. This proposal will “top up” the land presently set aside in the PWDP and provide a useful buffer to demand. The Site owners have been keen to release this land for more intense development for some time; there is no prospect of land banking.
(e) support reductions in greenhouse gas emissions; and	The Site has significant advantages in being easily accessible to the town centre and reserves, community facilities and schools. The proposal retains a consolidated form to Rangiora with good connectivity and linkages to recreation space and commercial centres reducing the need for car travel.
(f) are resilient to the likely current and	The Site is within the area of influence of a major river but the non-urban flood assessment maps do not show extensive flooding likely at the Site.

future effects of climate change	Being inland it is not at risk from climate change induced extreme natural hazard events like sea level rise. or river flooding.

Effects on ecosystems and habitats

51. The Site is currently used for a mix of low intensity (grazing) farming, and lifestyle purposes. Shelter belts and utility buildings have been established

52. The Site has been identified in the PWDP with two ecological overlays (the PWDP ecological overlay – Plains and Low Plains Ecological District). They are a district-wide overlays and no specific ecological values have been identified in the Proposed Waimakariri District Plan. These overlays seek primarily to retain indigenous vegetation. The PWDP identifies SASM 025 nearby the Site. That is a Site and Area of Significance to Maori and in SASM - Schedule 1 is identified as *being River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species.*

Effects on natural and physical resources

53. The Site drains in a SE direction towards the newly developing residential area.

54. There will be a degree of site disturbance as part of creating the roading network, and reserves, and as part of curtilage development on each lot.

55. The proposed use for residential activity inevitably leads to loss of some rural productive potential as land owner intentions are not about farming or productive use of the land, but lifestyle use and enjoyment. Built forms and hard surfaces become more dominant.

56. The Site comprises 4ha bocks now and these are not able to be used effectively for productive purposes other than for intensive productions based on tunnel housing and other supported production systems. None exist in the Site now.

57. The Site contains Class 2 and Class 3 soils as defined in the NZ Land Use Inventory (Landcare Research) Land Use Capability classes 1-3 **(Figure 10)**. Productive use of these soils other than for low level purposes i.e. grazing, is not feasible given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production).

Figure 10: Site soils: Site outlined in red; (Canterbury Maps)
Class 2 soils: bright green/Class 3 soils: light green;

Discharges of contaminants into the environment

58. There will be no discharges of contaminants into the environment. Wastewater will discharge to the Council's reticulated system.

59. Stormwater discharges will potentially be to ground given ground conditions or to an approved and consented stormwater management and treatment area which will meet all relevant Council standards.

Risks from natural hazards or hazardous installations

60. The PWDP planning maps show the Site as being within a Non-Urban Flood Assessment Area.

61. The District Plan maps do not identify high flood hazard areas or high coastal flood hazard areas, rather these are identified through the flood assessment certification process. This enables the most up-to-date technical information to be used. However, as a guide, areas that are potentially high hazard can be identified through the Waimakariri District Natural Hazards Interactive Viewer (NH - Introduction).

62. Rules that refer to a Flood Assessment Certificate require a certificate to be obtained from the District Council to determine compliance with the relevant rule. The alternative is to apply for resource consent as set out in the rule.

63. Rule NH-R2 states
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;

64. Assessment of flood risk and consequence can be undertaken at subdivision stage.

65. There will be no hazardous installations proposed on the Site.

Geotechnical assessment
66. The PWDP planning maps show the Site as being “Liquefaction damage is unlikely. Standard investigation procedure outlined in NZS3604 is appropriate”.

Contaminated land
67. A Preliminary Site Investigation can be carried out for the Site at subdivision stage.
68. An enquiry of ECAN has identified that two sites at the northern end of the Site potentially contain some contaminated land, which can be investigated further at subdivision stage **(Appendix 6)**. 315 Lehmans Road is an unverified HAIL site (previous use for clay target shooting) and 317 is registered as containing uninvestigated persistent pesticide bulk storage.

Servicing
69. Proposals for servicing the Site and the effects from such servicing in relation to domestic water supply, wastewater, stormwater, roading, and telecommunications will be required for any subdivision consent.

Economic effects
70. It is anticipated that urban development will generate positive economic effects, both from the investigation/development phase and for the longer run economic activity from householders participating in the local economy.

Climate Change effects
71. An assessment of the effects of the proposed rezoning on climate change is included as part of the assessment of a well-functioning urban environment above.
72. A well-functioning urban area that is designed and serviced in an integrated manner, applying sound urban design principles, will enable a reduction in greenhouse gas emissions compared to unplanned, ad hoc development that does not create compact urban forms located where the services and benefits of existing, established urban areas are not readily accessible.
73. There is a triangle of planning influence that can be brought to bear on reducing greenhouse gas emissions
a) Compact urban form minimising distances between homes and work/play options.
b) Proximity of homes to community facilities, services and amenities and business/work areas.
c) Design and provision of movement corridors and linkages that create opportunities other than for vehicles for getting around.
74. The Site of the proposed rezoning:
a) Helps in retaining a compact urban form to Rangiora.
b) Is easily accessible to the town centre and is located convenient to the recreation resources of the nearby Rakahuri/Ashley River, the airfield and racecourse and Arlington Park.
75. Rangiora has excellent connectivity to the City, both via the Northern Motorway, the new Northern Corridor, a cycle way link to Kaiapoi which is linked to the new north city cycle way along the Northern Corridor and a very regular bus service.

Positive effects
76. The proposed rezoning will provide for the continued growth of Rangiora by managing the development through an ODP. The proposal will provide a buffer to on-going high level demand for lots in Rangiora. It will cater for a specific housing need not found in GRZ Zoned land nor LLRZ land. The proposed rezoning is anticipating a form of development that is a much more efficient use of a qualifying site supporting a well-functioning urban area. It is a positive endorsement of Rangiora as a growth node in the District.
77. The benefits derived from a planned ODP approach include facilitating high levels of connectivity, creating community links to identified focal points. The Site is close to recreation facilities. A coordinated and integrated development will provide a distinctive environmental quality and point of difference to the development.
78. The Site adjoins existing and developing residential development on the western edge of Rangiora.
79. From a community well-being perspective, the provision of additional land for residential growth will continue to support the Council’s investment in community infrastructure by maintaining and facilitating growth rates, increasing the rating base and attracting development contributions.

STATUTORY PLANNING ASSESSMENT
80. Submissions must be assessed under the provisions of the RMA, including Part 2 and Section 32 (Requirements for Preparing Evaluation Reports).

National Policy Statements
National Policy Statement on Urban Development Capacity (NPS-UD)

81. The NPS–UD applies to this proposal as it is directed at Tier 1 urban environments, and Tier 1 local authorities which includes Waimakariri District as part of the Christchurch urban environment that is defined in Table 1 of the NPS, and additionally defined as:

any area of land (regardless of size, and irrespective of local authority or statistical boundaries) that: is, or is intended to be, predominantly urban in character; and is, or is intended to be, part of a housing and labour market of at least 10,000 people.

82. The NPS-UD recognises the national significance of:

a) Having well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future; and

b) Providing sufficient development capacity to meet the different needs of people and communities.

83. The NPS outcomes are to be achieved through objectives that address:

a) Planning decisions improving housing affordability by supporting competitive land and development markets.

b) Regional policy statements and district plans enabling more people to live in areas of urban environments near centres or areas with employment opportunities, area well serviced by public transport or a high demand for housing in the area.

c) Urban environments developing and changing over time in response to diverse and changing needs of people, communities and future generations.

d) Local authority decisions on urban development being integrated with infrastructure planning and are strategic over the medium term and long term.

e) Local authority decisions on urban development are responsive particularly for proposals supplying significant development capacity.

f) New Zealand's urban environments support reductions in greenhouse emissions and are resilient to current and future effects of climate change.

84. The key method to achieve these objectives is by development of a Future Development Strategy (FDS). This will set out how the Councils will provide for sufficient development capacity over the next 30 years to meet expected demand. There is no FDS for the greater Christchurch Urban Area that meets the requirements of the NPS-UD.

85. Work on development capacity completed for the NPS - UDC 2016 by the Greater Christchurch Partnership as an Update of the existing Urban Development Strategy (UDS) – Our Space 2019 confirmed what there was a shortage of feasible development capacity for future housing in Waimakariri District for the medium (next 10 years) and long term (10 to 30 years) periods. That assessment is now out of date as it does not address the requirements of the NPS-UD; and rates of take up of land have exceeded projected rates.

86. One of the key changes in the NPS-UD is that local authority decisions on urban development that affects urban environments are responsive, particularly to proposals that would supply significant additional capacity. It also amends the required methodology for housing and business capacity assessments.

87. The current CRPS does not meet the new NPS-UD requirement in relation to proposals for significant additional capacity. Regional councils are required to include criteria in the RPS to determine what plan changes will be treated for the purposes of Policy 8 as adding significantly to development capacity as soon as practicable. ECAN has yet to respond to this requirement.

88. The NPS-UD has immediate effect, so in the meantime, proposals such as this submission must be assessed in the context of the overall intent and purpose of the NPSUD as articulated in the NPS-UD objectives and policies. This includes that NZ has well-functioning environments; provides sufficient development capacity to meet the different needs of people and communities; planning decisions improve housing affordability to contributing to competitive house and land markets; and RMA plans enable more people to live near major employment areas, where there is existing or planned public transport, and where there is high demand for housing.

89. The NPS-UD is the higher order document and its requirements override those of lower order documents where there is a conflict, including regional and district RMA plans.

90. Key objectives and policies in the NPS-UD are assessed here:

NPS-UD Objective/Policy	**Assessment**
Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	The proposed development will further enable Rangiora to sustain itself as a well-functioning urban environment by consolidating the residential area close to the town centre, and provide residential development close to public transport links and existing community and commercial facilities including Huntingdon Drive local centre. The proposal provides choices in the Rangiora housing market and in doing so

Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.	supports housing affordability. Whilst the proposal is for a premier larger lot urban residential development, it is important that all sectors of the market are catered for. This will be more affordable than forcing those wanting large sections out to the much larger and very limited areas of LLR D1 development, or having to purchase 2-3 sections in a standard residential subdivision. There Site is in multiple ownership and the landowners are working together to achieve the rezoning. It will bring more competition into the market by bringing new entrants into the market.
Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply: the area is in or near a centre zone or other area with many employment opportunities the area is well-serviced by existing or planned public transport there is high demand for housing or for business land in the area, relative to other areas within the urban environment.	The CRPS is due for review in 2024 but in the meantime the existing CRPS is not in accordance with the NPS-UD 2020. The proposed rezoning is on the edge of the District's largest centre, which offers a wide range of community and business services, and employment opportunities. It is expected that a proportion of future residents will commute outside the township, but as the township and associated business areas e.g. at Southbrook, continue to grow, this is expected to become proportionally less. Rangiora is well serviced with public transport, there is scope for future mass transit PP, and there is a high demand for housing at Rangiora. The Site adjoins the new West Rangiora Development Area, to the south. Extensions of public transport to service this growth area will be readily accessible to the Site.
Objective 6: Local authority decisions on urban development that affect urban environments are: integrated with infrastructure planning and funding decisions; and strategic over the medium term and long term; and responsive, particularly in relation to proposals that would supply significant development capacity.	Whilst not currently identified as a future growth area in RMA documents, the Site is well placed at the township edge to be serviced by existing infrastructure. Some upgrades may be required, which will be investigated further with Council prior to the hearing. See Policy 8 below for commentary on proposals which supply significant development capacity
Objective 8: New Zealand's urban environments: support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change	The proposal adjoins the existing built up are of Rangiora, close to public transport links. Its excellent accessibility to Christchurch City, substantially enhanced with the new Northern Motorway extensions, means it is now highly accessible to these nearby major employment areas. Travel distances are relatively short, minimising vehicle miles and the potential for greenhouse gas emissions. There is a cycleway link from into Christchurch City, and regular bus services, including an express route. The Site is inland and not subject to natural hazard risks associated with sea level rise arising from climate change.
Policy 1 – Planning decisions for well-functioning urban environments	Assessed at para 41-50
	The proposed rezoning is anticipated to provide sections that will be available for the short term (up to 3 years) and into the medium term (3-10 years) if adopting a more conservative outlook.

Policy 2 - Sufficient development capacity Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.	The locational and amenity advantages of Rangiora also favour strong ongoing demand. The PWDP UFD-O1 Feasible Development Capacity for residential activities identifies the need for 6300 residential units in the period 2018-2028, and 7100 residential units 2028-2048. These numbers are derived from Chapter 6 CRPS Table 6.1. and are out of date. Data from the Council (November 2021) confirms that there are about 800 vacant lots in Rangiora. Building consents are at about 180/year. That means there is about 4 years vacant land supply. A lead in time of 3-5 years is needed to go from rezone to house build so the Council is facing an unnecessary squeeze on land availability. That will translate in to an upward shift in land and section prices as has been the case at Rolleston. The data suggests that the PWDP will be late to the party to ensure there is at least sufficient development capacity to meet expected demand for housing land over the short term, medium term, and long term. There is a looming, inevitable land supply issue so any proposal to add capacity will push the Council closer to meeting the requirements of the NPS-UD. The proposal is consistent with ensuring there is at least sufficient land supply for housing.
Policy 8 – Responsiveness to plan changes Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is: (a) unanticipated by RMA planning documents; or (b) out-of-sequence with planned land release	The proposed rezoning is not anticipated by RMA documents - it is not a Greenfield Priority or Future Development Area in the CRPS, or a New Development area in the PWDP. A responsive approach to the proposal is required as it meets the Policy 8 criteria for unanticipated zoning. It will contribution to well functioning urban environments and will add significant development capacity. There is no development capacity for the housing typology proposed – so any provision is significant in this context. The development will deliver appx 311 high amenity large lot residential sites at an average density of 1500m2. This will be higher if a mix of densities are proposed, which may be appropriate in some parts of the Site, dependent on master planning work to follow.

91. Adopting the submission to re-zone the land, and enable the proposed development on the submission Site will satisfy the objectives and policies of the NPS-UD.

Proposed National Policy Statement for Highly Productive Land (NPS-HPL)

92. The Government proposed in 2019 a NPS-HPL to prevent the loss of productive land and promote its sustainable management. The overall purpose of the proposed NPS-HPL is to improve the way highly-productive land is managed under the Resource Management Act 1991 (RMA) to:

a) Recognise the full range of values and benefits associated with its use for primary production
b) Maintain its availability for primary production for future generations
c) Protect it from inappropriate subdivision, use, and development.

93. The NPS-HPL is still a proposal and not intended to take effect until after Gazettal. At the date of this submission the NPS-HPL has no effect and no assessment of it is required for the purposes of this submission.

94. The Proposed NPS-HPL interim definition of HPL is land defined as Land Use Capability Class 1-3 soils. A portion of the Site contains Class 2 and 3 soils (see **Figure 10)**. Highly productive use of these soils is not realistic given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production). Its present use as lifestyle blocks, low level grazing and agistment is the more likely long run use of the Site if not rezoned.

95. Objective 3 of the Proposed NPS-HPL specifically refers to highly productive soils being protected by avoiding *"uncoordinated urban expansion on highly productive land that has not been subject to a strategic planning process"*.

The Site was assessed through a strategic planning process (WDDS 2018) and the RRS as a preferred site for LLRZ development, and rejected for a change in zoning on the basis that it may be required for long term urban growth of Rangiora.
96. It is therefore considered that this submission to re-zone the Site is largely in accordance with the Proposed NPS-HPL.

National Planning Standards

97. The National Planning standards prescribe various matters under the RMA so that there is consistency among planning documents most relevantly here in terms of appellations for zones, and the standards applying to these zones.
98. The proposed rezoning adopts the standard zone appellation, in this case LLRZ as contained in the PWDP.
99. The PWDP identifies plan standards for minimum and average net site areas for the respective zones. These are modified for the proposed rezoning as a higher density LLRZ.
100. The higher density LLR zoning is entirely consistent with the NPS purpose for the LLRZ as reproduced below. In this case, the principal constraint to more intensive development is the peri-urban location where a lower density transition to the rural environment is appropriate (particularly noting that the zone boundary is 'mid block' so there is no natural or physical buffer between rural and residential areas); the existing pattern of 4 ha lots with existing substantial homes and gardens; and the fact that the premier large lot subdivision proposed relies on consistency of housing quality and character to be deliver on this vision for the area.

Large lot residential zone

Areas used predominantly for residential activities and buildings such as detached houses on lots larger than those of the Low density residential and General residential zones, and where there are particular landscape characteristics, physical limitations or other constraints to more intensive development.

Low density residential zone

Areas used predominantly for residential activities and buildings consistent with a suburban scale and subdivision pattern, such as one to two storey houses with yards and landscaping, and other compatible activities.[2]

Canterbury Regional Policy Statement 2013 (CRPS)

101. Chapter 6 of the RPS *"provides a resource management framework for the recovery of Greater Christchurch, to enable and support recovery and rebuilding, including restoration and enhancement, for the area through to 2028. Recovery in Greater Christchurch is also supported by the provisions in Chapter 5 notated as 'Entire Region'. The provisions in the remainder of the RPS also apply.3"*
102. An assessment of the proposed rezoning against the relevant CRPS Objectives and Policies is set out in **Appendix 1**. This should be read in the context of the CRPS being overdue for review and that it does not provide a regional response to the NPS-UD. The
need to focus on earthquake recovery has now passed and so many of the directive provisions need to be given appropriate 'weight' in a new national policy environment with a focus on flexible, responsive panning approaches that better provide for people's needs and well-being.
103. That assessment shows that

a) The development proposal achieves the objectives for the location, design and function of new developments (Objective 5.2.1)

b) The traffic effects of the proposal are unlikely to give rise to adverse effects and so achieves CRPS objectives for the strategic land transport network (Policy 5.3.7)

c) The Site falls outside the FDAs shown on Map A of Chapter 6 and in that regard is inconsistent with RPS Policy 6.2.1 clauses 1 to 3.

1. identifies priority areas for urban development within Greater Christchurch;

2. identifies Key Activity Centres which provide a focus for high quality, and, where appropriate, mixed-use development that incorporates the principles of good urban design;

3. avoids urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS

d) The environmental effects assessment outlined above establish that the proposed development is consistent and will not give rise to any concerns with respect to all the matters listed in RPS Policy 6.2.1 clauses 4. to 11. These matters are:

6.2.1 Recovery framework

Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that:

1. As above;

2. As above;

3. As above;

4. protects outstanding natural features and landscapes including those within the Port Hills from inappropriate subdivision, use and development;

5. protects and enhances indigenous biodiversity and public space;
6. maintains or improves the quantity and quality of water in groundwater aquifers and surface waterbodies, and quality of ambient air;
7. maintains the character and amenity of rural areas and settlements;
8. protects people from unacceptable risk from natural hazards and the effects of sea-level rise;
9. integrates strategic and other infrastructure and services with land use development;
10. achieves development that does not adversely affect the efficient operation, use, development, appropriate upgrade, and future planning of strategic infrastructure and freight hubs;
11. optimises use of existing infrastructure; and
12. N/A

e) The proposed rezoning achieves policies relating to:
- Sustainability;
- Integration of transport infrastructure and land use;
- Urban design; and
- Biodiversity, natural hazards, landscape, soils, contaminated land.

104. In terms of the CRPS polices for rural residential developments (Policy 6.3.9) the proposal sits square with all policy matters other than being a location identified in an adopted Rural Residential Strategy; and being at a higher density than provided for under this policy (ie greater than 1-2 hh/ha). As such it has a majority of features entirely consistent with the policy.
105. The CRPS includes housing capacity targets as below

6.2.1a Targets for sufficient, feasible development capacity for housing [inserted in accordance with sections 55(2) and 55(A) of the Resource Management Act 1991, from the National Policy Statement on Urban Development Capacity 2016]
For the period 2018-2048, sufficient, feasible development capacity for housing is enabled in Greater Christchurch in accordance with Table 6.1.
Table 6.1 Targets for housing development capacity in Greater Christchurch, 2018-2048

106. These derive from Our Space, under the requirements of the then NPS-Urban Development Capacity 2016, since replaced by the NPS-UD 2020. The targets (known as bottomlines in the NPS-UD) are to be treated as 'minimums' not 'maximums'.
Policy 6.3.12
enables urban development in the Rangiora and Kaiapoi FDAs (new Development Areas in the PWDP) where needed to meet the medium term targets. This a 'minimum' allocation approach contrary to the NPS-UD. The NPS-UD favours over allocation, including in locations unanticipated by RMA plans, where it will add additional development capacity, can be integrated with infrastructure planning and funding, and will contribute to well functioning urban environments – as is the case the proposed Lehmans LLR D2 zone.
107. The proposed Lehmans LLR D2 zone is consistent with the CRPS except with respect to those parts of the CRPS which are out of step with and do not give effect to the higher order plan, the NPS-UD.

Proposed Waimakariri District Plan
108. An assessment of this proposal against the relevant PWDP Objectives and Policies for urban growth and development as notified on 17 September 2021 is set out in **Appendix 2.**
109. That assessment shows that the proposed rezoning is entirely consistent with the relevant objectives and policies, including as sought to be amended by this submission. Those amendments are to UFD-P3 Identification/location and extension of Large Lot Residential Zone areas; and LLRZ-O1 and LLRZ- P1-5 and reflect the intent and outcomes intended for the proposed LLRZ D2 zone, which is a higher density LLRZ zone than the PWDP LLRZ zone (renamed LLRZ D1 in this submission).

ASSESSMENT AGAINST OTHER PLANNING DOCUMENTS
Our Space 2018-2048 Greater Christchurch Settlement Update (2019)
110. Our Space is a non-statutory document prepared under the Local Government Act. It
"responds to the new Government Policy Statement on Land Transport, which has increased funding for mass public transit schemes, and meets the requirement of the National Policy Statement on Urban Development Capacity (NPS-UDC) 2016 to prepare a
future development strategy…. Specifically, it:
• sets out how targets for housing for the next 30 years will be met, accommodating an additional 150,000 people;
• identifies locations for housing growth, encouraging Central City and suburban centre living while providing for township growth in Rolleston, Rangiora and Kaiapoi;…

• *promotes a compact urban form, which provides for efficient transport and locates development in a manner that takes into account climate change and sea level rise.[4].*

..Underpinning this settlement pattern approach is the vision for a transformation of the transport network that fosters much greater public and active transport usage, and reduced reliance on the private vehicle.

111. Our Space acknowledges that this will require commitment from the Government to invest in the necessary improvements to our transport system, which could include investing in rapid transit services. To date, there has been no successful business case for improved public transportation, including not as a Covid 19 fast track infrastructure project.

112. The Our Space housing capacity targets (Table 3) and Future Development Areas are related to growth of urban areas.

113. Our Space, like the CRPS (and the Operative District Plan) are now out of date, as they do not reflect or give effect to the new requirements of the NPS-UD.

Waimakariri 2048 District Development Strategy (WDDS)

114. The preferred growth directions for Rangiora in the WDDS 2048 (2018) are outlined above (under 'Site') i.e. westwards to Lehmans Road, and otherwise eastwards. However, the Council in its decision on the RRS, recognized west of Lehmmans Road as a potential longer town urban growth area.

115. The WDDS Rangiora Snapshot (pp38-39) -when looking ahead to 2048 proposed that:

a) Rangiora remains the District's largest town
b) 30,000 – estimated population (2048)
c) 12,025 – estimated households
d) 5,025 - new households in Rangiora
e) Continues to accommodate one third of the District's residential growth
f) 167 – estimated annual building consents for new dwellings for the next 30 years
g) 423 hectares of additional feasible residential land required by 2048 (this includes capacity in remaining stages of existing residential developments as well as new greenfield areas inside and outside of the Infrastructure Boundary)
h) Future residential growth directions proposed to the east (predominantly) and west of the current town
i) Opportunities for intensification/regeneration to be identified
j) New growth directions take into account areas of unacceptable natural hazard risk and areas of significant environmental and cultural values
k) New growth areas to connect into existing sewer and water networks
l) Stormwater Levels of Service designed to meet increased performance requirements

116. At the 2018 Census Rangiora had a population of 17,841, and 7314 total dwellings (incl those unoccupied and under construction). Population projections for the District show an average annual change 2018-2020 of 1700 persons. If Rangiora continues to attract a third of all district growth as stated in the WDSS then Rangiora's population in 2021 will be around 18,900.

Mahaanui Iwi Management Plan

117. Part 1 of the PWDP in a section "Mana Whenua" sets out the position with respect to iwi and the review of the district Plan:

a) The District's territorial area sits within the takiwā (territory) of Ngāi Tūāhuriri which is one of eighteen Ngāi Tahu regional papatipu rūnanga, constituted under the ***Te Rūnanga o Ngāi Tahu Act 1996*** *to represent* ***mana whenua*** *interests.*

b) The preparation and change of a district plan must take into account relevant iwi documents. For the District, Ngāi Tahu has set out its resource management values, issues, objectives and policies within the Mahaanui Iwi Management Plan (2013).

c) The Mahaanui Iwi Management Plan identifies objectives, issues and policies for natural resource and environmental management for six pāpatipu rūnanga (including Te Ngāi Tūāhuriri Rūnanga). It seeks to ensure that the taonga and resources of Ngāi

Tahu mana whenua are recognised and protected in the decision-making of statutory agencies. The Mahaanui Iwi Management Plan contains a comprehensive suite of policies and objectives addressing the range of resource management matters of significance to tangata whenua. The District Council shall have regard to the Mahaanui Iwi Management Plan when preparing or changing the District Plan, to the extent its content has a bearing on resource management issues of the District.

118. The Mahaanui Iwi Management Plan (MIMP) 2013 was released on 1 March 2013.

119. The MIMP is a tool for tangata whenua to express their identity as manawhenua and their objectives as kaitiaki, to protect their taonga and resources, and their relationships with these. The MIMP seeks to ensure that these taonga and resources are recognised and protected in the decision-making of agencies with statutory responsibilities to tangata whenua. Importantly it is also a tool

that assists Papatipu Rūnanga representatives to articulate their values, issues and policy into statutory processes.
120. The MIMP includes both general objectives and policies about the management of land, air, and water, and also includes catchment specific objectives and policies.
121. Section 5.3 Wai Maori (pp77-98) contains an extensive discussion about tangata whenua rights and interests in freshwater. It provides a suite of Issues, Objectives and Policies for freshwater
122. Section 5.4 Papatuanuku (pp101-124) sets out the Ngai Tahu Subdivision and Development Guidelines that are to be read along-side objectives relating to:

a) Land use planning and management in the takiwā reflects the principle of Ki Uta Ki Tai. (from the mountains to the sea)

b) Rural and urban land use occurs in a manner that is consistent with land capability, the assimilative capacity of catchments and the limits and availability of water resources.

c) Inappropriate land use practices that have a significant and unacceptable effect on water quality and quantity are discontinued.

d) Ngāi Tahu has a prominent and influential role in urban planning and development.

e) Subdivision and development activities implement low impact, innovative and sustainable solutions to water, stormwater, waste and energy issues.

123. Section 5.5 Tane (pp127-137) includes objectives that focus on:
a) Regional policy, planning and decision making in the takiwā reflects the particular interest of Ngāi Tahu in indigenous biodiversity protection, and the importance of mahinga kai to Ngāi Tahu culture and traditions.
b) The customary right of Ngāi Tahu to engage in mahinga kai activity is recognised, protected and enhanced…
c) Customary use, and therefore mahinga kai, is given effect to as a first order priority for freshwater management in the takiwā.
124. Section 6.4 (pp213-224) addresses issues of particular significance to the lands and waters of the Waimakariri catchment within which the Site lies.
125. Relevant Objectives relating to urban development of land in that catchment include:

a) The natural "energy, vitality and life" of the Waimakariri River as a braided river is protected and restored.

b) The discharge of contaminants to the Waimakariri and its tributaries is eliminated.

c) Water quality and flows in the Waimakariri and its tributaries are improved to enable whānau and the wider community to have places they can go to swim and fish.

d) The mauri and mahinga kai values of the Waimakariri and its tributaries and associated springs, wetlands and lagoons are protected and restored; mō tātou, ā, mō kā uri ā muri ake nei.

126. A key issue relating to subdivision and development is that subdivision and development activities in the lower catchment have the potential to adversely affect Ngāi Tahu values such as waterways, mahinga kai and sites of significance (Issue Wai4).
127. The proposal provides for full urban reticulation of the three waters and is consistent with the objectives and policies contained in Chapters 5.3 and 5.4 of the MIMP. The proposal does not preclude individual land owners from installing rainwater collection and use from roof areas at the time of building development.
128. The proposal has been designed taking into consideration the potential effect of resultant subdivision and development on the rivers and streams that flow into the lowland rivers.
129. Overall it is considered that the proposal will not have adverse impact on the cultural values of iwi as set out within the MIMP.

SECTION 32 ASSESSMENT

130. A Section 32 assessment is contained in **Appendix 3.**
131. In summary, the PWDP zoning and associated rules (RLZ Zone with a minimum lot size for subdivision and a dwelling 4ha) do not meet the needs and aspirations of the current owners.
132. Strategic Council planning documents (specifically the WDDS) have a focus on only meeting urban growth demands within urban environments of existing towns. They favour intensification (15hh/ha) and a strict allocation of capacity by development areas. It is a control and command regime consistent with Map A of Chapter 6 of the CRPS but is out of step with the requirements of the NPS-UD which requires a more flexible, responsive approach, prohibits a hard fixed unmoveable urban/rural boundary.
133. This approach leaves little room for new proposals or proposals that do not sit square with the standard array of GRZ/medium density or SETZ (Settlement Zone). SETZ applies to some of the District's smaller settlements outside Greater Christchurch.
134. Neither LRZ nor Large Lot Residential (LLRZ) as notified in the PWDP is an efficient use of this block of land located as it is immediately adjoining the urban area of Rangiora, and in a location easily accessible to the town centre by active transport modes as well as car and several district reserves.
135. If this Site is not zoned for LLRZ D2 (minimum average lot size 1500m^2) use to enable residential re-development then it will drive pressure to re-zone elsewhere. That step potentially will not have the significant benefits to Rangiora long term in relation to enabling a well-functioning urban environment that enables people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future. Additionally re-zoning to LLRZ D2 will contribute to providing additional development capacity to meet the different needs of people and communities in a planned manner and

consistent with the NPS-UD.
136. The Site can readily be developed to reflect the principles of the Urban Design Protocol with values of character, context, and connectivity.
137. The Section 32 assessment concludes that the proposal to re-zone the Site from LRZ zone to LLRZ D2 Zone (average lot size 1500m$_2$) is the most appropriate method for achieving the objectives of the proposal, than the other alternatives considered.
138. Option 2 identified in the s 32 assessment is consistent with some PWDP policies notwithstanding that it does sit square with the strategic intentions signaled in the WDDS and the PWDP approach to providing for development capacity and urban development.
139. Option 2 identified in the s 32 assessment to re-zone the Site is the most appropriate given:

a) The proposals adopt the PWDP zones, development and activity standards with appropriate amendments. This ensures continuity of the District Plan anticipated environmental outcomes and urban amenity for Rangiora and adjoining residential areas;

b) Will be consistent with and give effect to many of the relevant PWDP objectives and policies;

c) It is a logical extension to the developed and developing residential land adjoining the Site while achieving a compact, efficient urban form that removes pressure on isolated rural land elsewhere around Rangiora.

d) It gives effect to the NPS-UD, specifically Objective 6 c) and Policy 8, delivering significant additional development capacity and contributing to a well functioning urban environment.

e) It is assumed that there will be capacity in the public utilities and the existing road network, including planned upgrades, to accommodate the traffic effects of the redevelopment;

f) The proposed Site specific ODP will provide certainty of the final form and disposition of the re-zoned area including its proposals for reserves, roading, future linkages for pedestrian and vehicular traffic.

140. The re-zoning proposal is considered to be appropriate to achieve the sustainable growth and development of Rangiora.
141. The economic, social and environmental benefits of the proposed rezoning outweigh any potential costs.
142. The overall efficiency and effectiveness of the proposed rezoning (Option 2) is high, in comparison to the alternative options set out in the s 32 Assessment which are low (Options One and Four) or low to moderate (Option Three).
143. The PWDP proposes to release land for development in the new Development Areas at Rangiora and Kaiaipoi through a novel and untested certification process that is not clearly derived from RMA statutory powers, nor Local Government Act 2002 (LGA) authority. This approach is not proposed for the LLR Overlay areas. As the proposed Lehmans Road LLR D2 zone proposed by this submission seeks large lot urban densities, it is anticipated that Council may favour the certification process if it accepts the proposed rezoning. This is opposed – rezoning to LLRZ D2 is sought.
144. Potential difficulties with the proposed certification process are identified and discussed in the Section 32 Assessment. (**Appendix 3)**. In summary, the process is hugely discretionary, does not provide conventional rights to an applicant (eg right of objection/appeal) meaning decisions cannot be challenged, and it is not apparent that the process will be appropriately documented with a transparent record of the decision-making within the certification process. Further uncertainty arises in the practicalities of how to negotiate and manage the staging, funding and building of key infrastructure across a range of Sites, and a risk that land supply is controlled by a limited number of large developers. It is a far less efficient and effective method for delivering land for housing than the Council rezoning the land in the PWDP.
145. The proposed rezoning is considered to be the most appropriate, efficient and effective means of achieving the purpose of the RMA.

CONSULTATION

146. The landowners and their consultants have submitted on the WRRS and the WDDS (**Appendix 4)**.
147. The submissions to re-zone as rural residential or identify the Site as suitable for LLRZ have been rejected as noted above. LLRZ but at higher densities as now proposed is considered to be a more efficient use of the land and better meets market demand. 5000m^2 sites provide more land is needed for a spacious home and garden.
148. The landowners have been consistent in their wish to find a zone and possible land uses better suited to their needs.

CONCLUSION

173 The submission seeks to rezone 58 ha of land adjoining Rangiora from Lifestyle Rural Zone (LRZ) to Large Lot Residential with a specific density standard (LLRZ D1), minimum average lot size 1500m^2.
149. The Site has a long history of rural lifestyle use. It is not significantly restricted by potential natural hazards especially flooding, nor does it have physical limitations for development for residential purposes as it is not liquefaction prone, and has no known geotechnical limitations but does contain an area of LUC 2 soils. It is near a site of significance to iwi (SASM – 025) being the Rakahuri/Ashley River The Site has access to a collector road and is near to a strategic road giving direct access to the town centre and a range of community amenities and facilities.
150. The Site immediately adjoins the urban area of Rangiora, and is well located to join in to Council utility services. It is well suited for conversion to residential use.
151. The Site is not identified within the westward growth direction for Rangiora in the District Development Strategy 2018 nor is

it part of the DEV-WR development area which adopts Lehmans Road as its western boundary. It is in a location that achieves coherent and compact urban form offering ease of access to business services, community facilities, reserves and the primary road network.
152. The proposed rezoning provides for a connected and high amenity residential living environment not presently available under the PWDP while avoiding and/or mitigating any potential adverse effects on the environment. It will provide for continuing high demand for a variety of high quality residential sections aimed at a particular segment of the housing market in an ideal location, easily accessible to the existing town centre services and facilities. It will broaden the range of housing available. As such, it is consistent with the NPS-UD including Objective 6c) and Policy 8, to be responsive to proposals which supply significant development capacity and contribute to a well functioning urban environment.
153. The use of this Site for residential purposes can be a sustainable and efficient use of land and infrastructure. The proposed rezoning better provides for the social, economic, environmental well-being of the landowners and the Rangiora community than continuation of the current low intensity lifestyle land use on 4ha blocks, or a conventional LLRZ residential use.
154. Any potential adverse effects of the implementation of the proposed rezoning can be assessed at subdivision stage but there has been no restriction on servicing the blocks to date. Capacity will need to be confirmed for infrastructure, power and road network. Any future subdivision of the Site will need to confirm water supply and wastewater treatment and disposal options.
155. Rezoning of the site to LLRZ zone is not inconsistent with the policies and objectives of the PWDP, but it is at odds with the dated CRPS approach to provision of urban growth and housing capacity for Greater Christchurch, to the extent that it is not within an FDA created by Change 1 to the CRPS and is not identified as an LLRZ site under the strategic RRS prepared by the Council.
156. As the proposal helps achieve the purpose of the RMA, and has been shown to be consistent with the relevant provisions of the NPS-UD, the submission can be accepted by Waimakariri District Council.

Original Submission

Summary Reasons for the Submission

The reasons for our submission are outlined below.
a) The preferred relief (**the proposed rezoning**) is both appropriate and necessary to achieve sustainable growth and development of Rangiora and the District and meet the requirements of the National Policy Statement for Urban Development 2020 (**NPS-UD**).
b) The Site identified in Figure 1 and at para 1 of the Preferred Relief above is a logical and preferred location that lends itself to a specific type of housing development not provided within the PWDP as a residential option adjoining but outside the existing urban areas. Nowhere is it possible to develop in a comprehensive, coordinated way a low density, high quality residential environment in the District's towns, the Rural Lifestyle Zone or Settlement Zone as a permitted activity.
c) The requirement for 12/15 hh/ha in GRZ zones (the majority of land in urban areas) drives development to modern scale relatively small urban lots best produced as a package across a significant land holding. The GRZ subdivision standards do not provide for the needs of people who seek a generous sized urban lot residential setting. This is a housing sector that is running against the planning tide of intensification but is, nonetheless, a legitimate form of housing in an appropriate setting. The barriers to such development in urban areas requires an appropriate setting/ location in the rural areas but close to or adjoining the urban areas and at a much lower density than is desired or appropriate (the PWDP LLRZ) to meet the housing needs for generous sized urban lot residential living..
d) The PWDP subdivision standards for LLRZ require lots that are very large for those whose primary interest in a rural setting is a form of residential living, not one that requires significant maintenance and management often involving animals or machinery at scale. Conversely, the GRZ subdivision standards do not provide for the needs of people who seek a large lot residential setting
e) The focus in the PWDP is on prescribing a limited range of residential options and tightly controlling and constraining housing choice within those options. Further urban growth is also tightly constrained and controlled around DEV areas around Rangiora and Kaiapoi but for a very specific form of residential development driven off density requirements that do not match the needs of all landowners.
f) The focus in most new District Plans, driven in part by the National Planning standards, is to simplify the range of zones, to standardize lot sizes, to supposedly create efficiency and certainty through ease of administration of the District Plans. This is done by constraining housing and land development choices by lot size, by location, by built standards and the disposition of built/open elements in a site. However, the National Planning standards do provide for large lot urban residential living, a residential living option which has not been taken up the PWDP (due most likely to the restrictive provisions of the CRPS which only prescribe one from of lower density residential living, at a density of 1-2 hh/ha).
g) This planning approach may be a standard approach to resource allocation but it does not provide a flexible, responsive

approach to innovative and new development options. The Government is creating policy settings that on one hand seek intensification in urban areas, while at the same time pushing away from a land allocation model of planning. The PWDP in striving to face both policy directions has a package of measures that are in fact a major barrier in terms or cost, timeframes and certainties for proposals that are not cut from the suite of housing and development options set out by the PWDP. The allocation of land in preferred development areas, it must be said, runs counter to the Government's push, and now its direction, to free up land for development, to encourage innovation in housing (presently with a focus of intensification) and to make available a range of responses to the need to meet the housing needs of people and communities set out in the NPS-UD.

h) While the weight of demand (and the planning response) is around affordable housing, around small lots and dense development that supports investment in public facilities and amenities such as public and active transport, reserves, and commercial services, there is always a wide spectrum of preferences at play in the housing market. The demand for high quality, generous houses set on generous sized parcels of land within high amenity settings is an important and no less relevant housing sector. There is a strong unmet demand, as confirmed by advice from Bayleys real estate (**Appendix 5**) for larger family homes with room for a pool or similar. Purchasers want to be close the amenities of Rangiora and within walking and cycling distance of local schools. They do not want the only available options – a 4 ha lifestyle block or 5000m^2 rural residential site at Mandeville or Ohoka.

i) Interestingly enough for a nation built on the so-called quarter acre paradise, recent policy and planning interest in housing and land development has now seemingly positioned the 1011m^2 section as a luxury item, as the antithesis of providing for community well-being and needs. It is as though the old quarter acre of itself acts against building a sense of community despite being able to be developed in a planned, structured, coordinated or integrated manner. Rather than being a frivolous discretionary item in land development
and housing choice, a well-planned, well located and properly serviced low density residential environment has much to offer urban environments. They can be tactically used to provide shape and edge to urban areas, they can provide a mass of amenity different from (and potentially complementary to), but no less legitimate in urban outcome terms, to conventional GRZ zoned land.

j) In many ways the approach of a district plan to the role and place of the old quarter acre is not dissimilar to the issues faced by comprehensive retirement villages when first proposed. The idea of dense, almost gated and self-contained communities, with multi storey buildings also did not sit well in many district plans. But now they are accepted as an important part of the urban fabric catering to a specific demographic and health demographic. Most plans enable them.

k) Provision for low density residential in an urban setting, or failing that likelihood, in an adjoining rural zone is a fundamental gap in the district plan.

l) The submission seeks to provide for another housing typology not provided in the PWDP and in a location with significant planning merit. The planning case was made out in a detailed submission to the proposed Rural Residential Strategy (**RRS**) for the land identified in this submission to be "reserved" for conventional Rural Residential zoning in the review of the District Plan. That submission was rejected in favour of a decision ascribing an unspecific strategic significance to Lehmans Road as the urban boundary; simply the decision was that rural residential development here would preclude this area as a future urban growth path, even though this was likely to be very long term as the Waimakariri District Development Strategy (WDDS 2018) for the period up to 2048, does not favour urban growth west of Lehmans Road.

Officer Recommendation

Continue to exclude the area west of Lehmans Road and the racecourse land at Rangiora as growth areas as these were originally considered but not included in the draft RRDS as they trigger the key preliminary criteria of: being on the direct edges of a main town outside of the Projected Infrastructure Boundary (PIB) thereby foreclosing more intensive long-term urban development, and…

Panel Recommendation

The panel accepted the officer recommendations to exclude areas on the fringes of Rangiora in the final RRDS due to these having the potential to foreclose more intensive long-term urban development of the town.

m) In light of the above decision on the Waimakariri Rural Residential Strategy, the proposal now is for a form of high amenity low density urban zoning, which whilst in demand is entirely absent from the PWDP. This will be a long term urban form of development. The proposal set out in the submission will achieve a compact, and efficient, urban form on the edge of Rangiora with excellent connectivity by multiple transport modes. It provides for continuous urban development by enabling a built form which can act as a strong zone or urban boundary.

n) The proposed rezoning will accommodate approximately 311 LLRZ lots1 at the proposed amended density standards for LLRZ D2 (average size 1500m^2). It will contribute to a well-functioning urban environment, meeting the NPS-UD Objective 6(c).

o) Any adverse effects on the environment arising from the proposed rezoning will be minimal, if any, and can be adequately mitigated. A high amenity master planned development is proposed.

p) Significant positive effects arise from the proposed rezoning. It will enable the short term housing demand at Rangiora to be met, and can deliver a housing typology for which there is demand, on lots that are not a burden to the landowners (which is the case for 4ha and the very limited areas of LLRZ D1 with a density of 1-2 hh/ha) and for which there is no provision in the PWDP. At present rates of land uptake there is about 4 years vacant land supply in Rangiora. Given it takes 3-5 years to bring land from zoned state to on the market as developed lots, there is some urgency in providing additional capacity. This proposal helps address an anticipated shortfall in residential zoned plan enabled land.
q) There is no additional cost to the Council in re-zoning the Site as there is expected to be capacity in the public utilities and the existing road network, including planned upgrades.
r) Amendments to PWDP objectives and policies may be necessary to provide for a higher density LLRZ, but of themselves will not act against those relating to Strategic Directions Urban Form and Development and Urban Growth. The PWDP approach to zones and
identification of future development land is already out of step with higher order Resource Management Act 1991 (RMA) statutory documents because they do not give effect to the NPS-UD (and are sought to be amended through this submission).
s) The alternatives of retaining Rural Lifestyle or Large Lot Residential zone across the entire Site are not an efficient use of land which immediately adjoins the urban area of Rangiora, and is highly accessible to the town centre by active transport modes as well as car.
t) The proposed rezoning is consistent with and the most appropriate, efficient and effective means of achieving the purpose of the RMA.

The Site
1. The Site is a 58ha block of land ('the Site') accessed from Lehman Road, Rangiora **(Figure 1)**. It is owned by the two submitters and 12 other landowners.

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1 Assumes 20% of land area taken for servicing including roading, reserves and stormwater management if required.

Figure 1: The site (outlined in blue (Google Earth)

2. The Site is surrounded by RLZ land that is used for a mix of lifestyle and conventional farming. To the NE is the Rangiora Eco Holiday Park, and beyond the Park is the Rangiora Racecourse about 300m away from the nearest lot and 1km from the centre of the Site. Land to the south east is GRZ and part of urban Rangiora with newly developing residential land west of West Belt. About 1.9 km to the NW is Rangiora Airfield. About 1km north of the most northern lot is the Ashley River.
3. The southern-most lot in the proposal with the Rangiora Vet Clinic faces, but does not have access to Rangiora-Oxford Road (State Highway 72). This arterial road provides the main road connection in to the centre of the town. The well-established Fernside Rural residential area is about 2.5km west from the junction of Lehmans and Rangiora-Oxford Roads.

Figure 2: the site is a broader context (Site marked red)

4. The Site is not identified as lying within a preferred growth direction for Rangiora in the Waimakariri 2048 District Development Strategy (2018) (**WDDS**) **(Figure 3)**. No land west of Lehmans Road is included in the West Rangiora Development Area (**DEV-WR**) in the PWDP.

Figure 3: Figure 11 WDDS

5. The Council reviewed its strategic approach to the location and provision of Rural Residential land (now zoned LLRZ in the PWDP) in the WDSS. It adopted the position that it would:

a) Explore tools such as cluster development to manage rural character

b) For rural residential development, adopt an approach that has a primary focus on creating new rural residential areas, with a secondary focus on enabling large lot intensification within existing rural residential areas where there is sufficient community support and servicing available

c) Review the Rural Residential Development Plan for the whole District (pg 21 WDDS).

6. Rangiora presently has a population of 17,841 (2018 Census). It grew steadily between 2006 and 2018. Growth of Rangiora since then has continued in step with the district growth which has increased 8.2% between 2018 and 2021 from 61,300 to 66,300 at an annual average of 2.8% from 2018 to 2020 (Statistics NZ Subnational population projections at 30 June 2021: provisional).

2006 (count)	2013 (count)	2018 (count)
12,165	15,069	17,841

Statistics NZ

Population projections at 30 June

PLANNING STATUS OF THE SITE

Chapter 6 of the Canterbury Regional Policy Statement

7. An assessment of the CRPS is set out in **Appendix 1** to this submission.
8. The Site is within the Greater Christchurch area.
9. It was not shown as a Greenfield Priority Area – Residential (GPA) on Map A of the Canterbury Regional Policy Statement (CRPS). The GPA terminates at Lehmans Road.
10. As a result of the Minister for the Environment's decision of 28 May 2021 on Change 1 to Chapter 6, an area largely south of Oxford Road and a finger of land to the north of Oxford Road was included as a Future Development Area (**FDA**) (**Figure 4** orange).

Figure 4: Map A Chapter 6 Regional Policy Statement Greenfield Priority areas
Site location identified with red circle (appx)

11. The FDAs are intended to accommodate the increased demand for new dwellings in that part of Waimakariri District within the Greater Christchurch Urban Area and to respond to the NPS-UD. They do not provide "plan enabled" land as they need to negotiate a rezoning process to confirm their status as land developable for housing and other urban purposes.
12. The proposal for a LLRZ zone with average lot sizes of 1500m2 is inconsistent with the policy approach of Chapter 6 for Greater Christchurch, in that if fits none of the residential living typologies provided for in Chapter 6 and is not in a location identified for urban or rural residential development. It sits 'between' the urban and rural residential densities provided for in the CRPS (minimum 10 hh/ha for urban in Waimakariri, and average 1-2 hh/ha for rural residential). The proposed density is appx. 6.66 hh/ha.
13. Notwithstanding, the proposal meets all the location and other criteria in CRPS Policy 6.3.9 for rural residential development. It is:

- Outside the CIAL noise contours
- Has some sites with restrictions from the take-off and landing vectors for Rangiora Airfield but not such as to impact its operational capacity.
- Is outside the groundwater protection zone
- Is not within the Waimakariri stop bank system
- Has no views of or to the Port Hills
- Has good access for emergency services
- Will not create reverse sensitivity issues with adjoining land uses; Rangiora Racecourse is 500m away.
- Free of significant natural hazards and is a flat site.
- Supports no significant natural values or ecological values.

• Contains no SASMs.
• Can be integrated into or consolidated with the existing urban area of west Rangiora.
• Contains no surface water bodies so there will be no adverse impacts on these.
• The development will be contingent on an ODP to provide integrated design for subdivision and land use, and provide for the long-term maintenance of a high quality high density rural residential character.
• The proposal is not intended as a staged development towards full urban; rather it is intended to provide a unique residential environment that can stand alone and contribute to the urban fabric of Rangiora like Palmview in east Rangiora, or as Kaiapoi Lakes does for Kaiapoi.

14. Overall, the proposal is not consistent with Chapter 6 but that is more a function of its original purpose when formulated in 2013. Notwithstanding that, the submission for a lower density residential focussed, high quality urban environment that attaches to an existing urban area and that promotes a coordinated pattern of development has planning merit.

Operative Waimakariri District Plan

15. The Site is zoned Rural in the Operative Plan. The minimum lot size for subdivision and a dwelling is 4 ha.

Proposed Waimakariri District Plan

16. The Site is zoned Rural Lifestyle Zone **(LRZ) (Figure 4).** The minimum lot size for subdivision and a dwelling in the LRZ is 4 ha.
17. Oxford Road is a strategic road and Lehmans Road is a collector road.

Figure 5: Proposed District Plan Zoning (site outlined in red)

18. The Site is also subject to, or potentially influenced by, a number of Overlays:
a) Rangiora Airfield Take Off Climb and Approach Obstacle Limitation Surface (**Figure 6**)
b) National Grid Transmission Lines (**Figure 6**)
c) Liquefaction: Liquefaction damage is unlikely (**Figure 6**)
d) Non-Urban Flood Assessment Area (**Figure 7**)
e) Geographic areas: Ecological Area – Plains
f) Ecological District – Low Plains

Figure 6: Rangiora Airfield Take-off and Approach vectors (blue dashed lines); Liquefaction damage unlikely (green)Transmission lines (green lines); Site outlined in red

Figure 7: Non-urban flood assessment & Waimakariri Flood Hazard maps
Blue – medium risk, green – low risk, white – very low

DEVELOPMENT PROPOSAL AND PROPOSED REZONING

19. Subdivision of the Site will create approximately 311 LLRZ D2 lots.
20. The key design drivers for the proposal are:
a) A high amenity premier residential zone with large houses on large sites – average 1500m^2, min 1000m$_2$ based on the St Kilda, Hamilton development concept (**Figure 8**).
b) LLRZ D2 standards would enable a lower density zone in the medium term e.g. 10 years to achieve a high quality consistent character subdivision. If developed as an integrated development subject to an ODP subdivision can be staged for to the proposal.
c) Creating strong connections with the immediate neighbourhood by providing a cohesive interconnected roading layout that picks up direct links to the eastern neighbourhood off Lehmans Road and the northern subdivision roading, and carries them into the Site.
d) Creating a high amenity and diverse residential neighbourhood by providing interfaces to roads, reserves and rural environments.
e) Respecting and building on local identity and character of Rangiora by retaining specific vegetation features from the Site, and anchoring the development into the wider landscape.

21. A development concept can provide for sound urban design by:
a) A hierarchy of movement corridors.
b) Prioritisation of walking and cycling.
c) A north-south alignment of street blocks to maximize solar access and provide for efficient use of lots.

d) Block perimeters being kept as small as practicable to aid permeability and higher public amenity.
e) Enabling a range of housing typologies set in high quality landscape and street setting with generous amenity plantings and curtilage.

Figure 8: St Kilda development images (Bayleys)

22. St Kilda, Cambridge is a premier development on the outskirts of Cambridge, centrally located and with easy access to the Waikato Expressway. It was originally part of a small dairy operation which was dissected by the Waikato Expressway, leaving a portion within the Cambridge Town boundary and the larger balance of the property of approximately 80 ha (which became St Kilda) on the Eastern side of the Expressway, left in the Rural Zone.
23. The initial development concepts were for a Rural Residential type development given the Expressway separation of the existing residential development on the Western side of the Cambridge Bypass, however this was not supported by Council and a new concept of larger residential sections of a 1600m² average size was developed and approved – see https://www.stkilda.nz/page/location/

EFFECTS ON THE ENVIRONMENT

Township growth and urban form

24. The Site immediately adjoins the western edge of urban Rangiora.
25. The WDDS indicated a general preference for the direction of urban growth of Rangiora to the east as a way of balancing up the residential areas around the town centre and some growth to the west.
26. The approach of the WDDS was to signal growth options to be confirmed in the District Plan Review:
The broad directions for greenfield residential growth for the District's main towns are set out in Figures 11 to 14. Further work will be carried out to identify and confirm the exact locations and extent of these residential growth areas, together with the intensification opportunities within existing urban areas. These will be enabled through the District Plan Review and other planning tools.
27. The Strategic Planning documents clearly signal active consideration of growth needs and growth directions. The options available to the Council were constrained by the approach of the CRPS as the District Plan has to give effect to the CRPS and cannot be
inconsistent with it. The CRPS took effect in 2013 and is overdue for review.
28. The CRPS tightly holds urban growth to the constraints of Map A Chapter 6 and the identified FDAs which although amended by Plan Change 1 in 2020 does not respond to the directions of the NPS-UD. In any event the approach is focused on the need for housing in full urban residential land, less on other residential development forms.
29. As such the Site falls outside the planning policy framework for urban growth. However, in terms of urban form and on the ground, there is considerable merit and logic to conversion of this existing LRZ land to a new high amenity residential form that can be integrated into the Rangiora urban fabric.
30. The proposal has the potential to anticipate the longer term growth path confirmed by the decisions on the RRS to protect the future growth option of more intensive urban development in this direction. It can set a pathway to further westward expansion on land
that holds few if any physical barriers to land development.
31. The proposal will contribute to the housing needs of Rangiora and in a form and location that does not undermine the long run urban form of Rangiora. Planned growth confirmed in the PWDP is already intended to extend westwards out to Lehmans Road and to keep the town edge squared up providing depth to future development and providing a rational basis for providing movement networks driven off the key roads such as Rangiora-Oxford Roads. The West Rangiora Future Development Area confirms this approach. The Site sits in the next block west of Lehmans Road so is not proposing a disjointed urban form, nor one that is not part of the long term thinking of urban form and growth for Rangiora.

32. A full residential zoning is proposed under LLRZ D2 and will provide a high quality street character, overall amenity and passive surveillance over the street, and will create the correct lighting standards, roading standard, fully formed footpaths and cycleways required for a high quality urban environment.

Neighbourhood and wider community effects

33. The Site is serviced by a collector road and is close to an arterial road. This provides for ease of access and safe and convenient movement to and from the Site. A planned development co-ordinated by an ODP can facilitate within the site

movement corridors and linkages through the Site to provide for walking and cycling.
34. A key positive neighbourhood and community effect will arise from the existing dwellings and their established gardens and plantings that will anchor new development and provide a point of reference for new dwellings. Development will not be on a bare site; it will take place in an existing established part-residential setting. The transition to a low density, high quality premier residential development will start from a favourable position and minimise the apparent extent and nature of the landscape change.
35. The Site is comparatively large (58.4 ha) and has the potential to support a variety of residential building typologies and this will contribute to a mix of households within the development and provide built form variety and interest in the streetscape. Whilst LLR D2 standards are proposed, it may be that part of the Site is suitable for other higher density forms of development, which would be within scope of the alternative relief, and could be considered as part of the master planning process required for preparation of an ODP (ahead of the hearing). The earlier stages of the St Kilda development were for large lot residential, with more clusters of townhouses included as later stages (and a retirement village). A retirement village is unlikely in this case, given the proximity of the Charles Upham Retirement Village.
36. Rangiora is well-positioned to accommodate and service the needs of a fast-growing resident population that will in turn support more business activity, schools, community facilities and community organisations.

Effects on tangata whenua values
37. The Proposed District Plan does not identify any Sites and Areas of Significance to Maori in the Site, but the nearby Rakahuri/Ashely River identified as SASM-025. This has been scheduled as being
River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species
38. The PWDP has Policy SASM-P8 which is relevant to pre-development processes:
Engagement with rūnanga
Te Ngāi Tūāhuriri Rūnanga and the District Council to encourage engagement with the Rūnanga priorto persons undertaking activities and/or applying for resource consent where the activity has thepotential to adversely affect identified sites or areas of Ngāi Tūāhuriri cultural significance. Where priorengagement with Te Ngāi Tūāhuriri Rūnanga h as not been undertaken by an applicant for an activitythat has the potential to adversely affect an identified site, the District Council will consult with the Rūnanga.
39. The Site is not listed as an archaeological site on the NZ Archaeological Site database.

Landscape and visual effects
40. Rural Lifestyle style development exists on the Site now (a series of 4 ha lots with a dwelling and associated accessory buildings on each). The landscape is dominated by shelter belts, utility buildings, significant trees and planted curtilages around dwellings many of which are well set back off the roads down RoWs.
41. An ODP will help to achieve an integrated, cohesive and coherent development The proposal will lead to a modification of the landscape of the Site from a predominantly lifestyle block landscape to a denser semi-urban environment dominated by residential building that will, in time, get the benefit of street tree and reserve plantings and landscape treatments around the houses.
42. The visual effects which will arise from a change in the number of vegetative and built elements in the landscape are significant, but not avoidable, if the Site is to contribute to the on-going growth of Rangiora. The change will contribute to a high quality amenity and quality of environment and one that will be entirely consistent with and supportive of the rural lifestyle residential development that has successfully established on the Site.

Well-functioning urban environments
43. The Site adjoins the existing built up urban area of Rangiora. Immediately to the east are existing or developing residential areas.
44. The conversion of the Site from present rural lifestyle uses to low density, high quality residential will continue a pattern of outward expansion of Rangiora. Such a change may not be consistent with the PWDP's identification of a Future Development Overlay for west Rangiora only as far west as Lehmans Road, but on the ground it will look and integrate as part of the urban fabric.
45. It will provide some replacement lower density living areas for the existing LLR zones at north west Rangiora – but at much more appropriate higher density that the LLR D1 standard which is 1-2 hh/ha. There are two such areas, shown on the planning maps below. River Road has an 'urban overlay' and is intended to be intensified to urban densities. The land on the opposite (east) side of Lehmans Road is a 'legacy' rural residential zoning which applies under the Operative District Plan. The landowners have developed the adjoining residential subdivision and wish to develop the land for full urban residential development. Services are in place to support this. The constraint to date has been Map A of the CRPS which does not include the land as a Greenfield Priority Area or Future Development Area, GR zoning of this land is consistent with the NPS-UD.

Figure 9: PWDP as notified – LLRZs shown in light grey. Diagonal stripes – urban growth overlay.
Site outlined in red.

46. Rangiora is growing apace. It is attracting significant interest from new home buyers as people respond to the significant investment in upgraded transport links (Northern Corridor and public transport) and a growing economic base for employment within the District and the City.

47. Rangiora has excellent connectivity to the City, both via the new Northern Corridor, and a nascent cycleway link into the City. There is a very regular bus service every half hour.(the No 1 Blue Line) The standard trip takes 70 minutes, and there is a twice daily weekday morning express service from Rangiora, and seven times weekday express out to Rangiora all via Kaiapoi.

48. The Site will step out the western edge of Rangiora, but as it exists in a peri-urban form now, such a change does not alter how the Site interacts with Rangiora as a whole. It is in many ways a functional part of urban Rangiora now; it's only the Zone boundaries and policy framework that create the sense of it not being part of Rangiora.

49. The Site is convenient to the Rakihura/ Ashley recreation trails, the racecourse, Arlington Park, and the airfield. The town centre is easily accessible.

50. The following assessment of the criteria in the NPS-UD for determining a well-functioning urban environment shows that the proposed rezoning will deliver urban, housing and residential outcomes that meet those criteria. There will be a variety of homes enabled by generous lot sizes. The Site is well-positioned, building as it does on an existing township well-serviced by public transport and cycling options, to provide good accessibility to jobs, community services, and open spaces, as well as mitigating climate change impacts and future natural hazards by being not near the coast and well removed from major rivers.

NPS-UD Policy 1

Planning decisions contribute to well functioning urban environments, which are urban environments that, as a minimum:	**Assessment**
(a) have or enable a variety of homes that: (i) meet the needs, in terms of type, price, and location, of different households; and (ii) enable Māori to express their cultural traditions and norms;	The proposal is to have larger lots supporting predominantly standalone dwellings and associated accessory buildings (including generous sized garaging) in an open landscaped garden setting. This will fill a gap in the range of housing typologies available at Rangiora and contribute to a better functioning urban environment overall at Rangiora. It is not necessary for each individual rezoning proposal to have a wide range of housing typologies, and in some circumstances this may not be appropriate. The rezoning will deliver a premier high amenity urban subdivision with generous sized lots which will complement existing and planned higher density residential development at west Rangiora. There is scope with the relief sought for a mix of residential densities. The appropriateness of this can be considered at the master planning/ODP stage. The Site has the potential to create a unique urban environment in Rangiora. It can follow the example of Palmview based on a lake or Kaiapoi Likes providing a niche housing option in Rangiora and the District meeting a need for residential land not constrained to GRZ standards.
(b) N/A business sectors	
(c) have good accessibility for all people between housing, jobs, community services,	The Site has access to a collector road and a strategic road providing easy access to key community amenities and facilities. The town is served by a public bus route to the city, and a cycle trail connecting to Kaiapoi and the City. The new West Rangiora Development Area adjoins the Site to the south. The Site will become closer to Rangiora public transport routes as they extend out to service this new growth area over time.

natural spaces, and open spaces, including by way of public or active transport; and	The Site is in walking distance to Arlington Park and the Rakahuri/Ashley which contains abundant recreations pace. It is easily accessible to the town centre and within walking distance to the Huntingdon Drive local centre.
(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and	The demand for housing and land in Rangiora is largely ahead of the planning means to respond. This proposal will "top up" the land presently set aside in the PWDP and provide a useful buffer to demand. The Site owners have been keen to release this land for more intense development for some time; there is no prospect of land banking.
(e) support reductions in greenhouse gas emissions; and	The Site has significant advantages in being easily accessible to the town centre and reserves, community facilities and schools. The proposal retains a consolidated form to Rangiora with good connectivity and linkages to recreation space and commercial centres reducing the need for car travel.
(f) are resilient to the likely current and future effects of climate change	The Site is within the area of influence of a major river but the non-urban flood assessment maps do not show extensive flooding likely at the Site. Being inland it is not at risk from climate change induced extreme natural hazard events like sea level rise. or river flooding.

Effects on ecosystems and habitats

51. The Site is currently used for a mix of low intensity (grazing) farming, and lifestyle purposes. Shelter belts and utility buildings have been established
52. The Site has been identified in the PWDP with two ecological overlays (the PWDP ecological overlay – Plains and Low Plains Ecological District). They are a district-wide overlays and no specific ecological values have been identified in the Proposed Waimakariri District Plan. These overlays seek primarily to retain indigenous vegetation. The PWDP identifies SASM 025 nearby the Site. That is a Site and Area of Significance to Maori and in SASM - Schedule 1 is identified as *being River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species.*

Effects on natural and physical resources

53. The Site drains in a SE direction towards the newly developing residential area.
54. There will be a degree of site disturbance as part of creating the roading network, and reserves, and as part of curtilage development on each lot.
55. The proposed use for residential activity inevitably leads to loss of some rural productive potential as land owner intentions are not about farming or productive use of the land, but lifestyle use and enjoyment. Built forms and hard surfaces become more dominant.
56. The Site comprises 4ha bocks now and these are not able to be used effectively for productive purposes other than for intensive productions based on tunnel housing and other supported production systems. None exist in the Site now.
57. The Site contains Class 2 and Class 3 soils as defined in the NZ Land Use Inventory (Landcare Research) Land Use Capability classes 1-3 **(Figure 10)**. Productive use of these soils other than for low level purposes i.e. grazing, is not feasible given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production).

Figure 10: Site soils: Site outlined in red; (Canterbury Maps)
Class 2 soils: bright green/Class 3 soils: light green;

Discharges of contaminants into the environment
58. There will be no discharges of contaminants into the environment. Wastewater will discharge to the Council's reticulated system.
59. Stormwater discharges will potentially be to ground given ground conditions or to an approved and consented stormwater management and treatment area which will meet all relevant Council standards.

Risks from natural hazards or hazardous installations
60. The PWDP planning maps show the Site as being within a Non-Urban Flood Assessment Area.
61. The District Plan maps do not identify high flood hazard areas or high coastal flood hazard areas, rather these are identified through the flood assessment certification process. This enables the most up-to-date technical information to be used. However, as a guide, areas that are potentially high hazard can be identified through the Waimakariri District Natural Hazards Interactive Viewer (NH - Introduction).
62. Rules that refer to a Flood Assessment Certificate require a certificate to be obtained from the District Council to determine compliance with the relevant rule. The alternative is to apply for resource consent as set out in the rule.

63. Rule NH-R2 states
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;

64. Assessment of flood risk and consequence can be undertaken at subdivision stage.
65. There will be no hazardous installations proposed on the Site.

Geotechnical assessment
66. The PWDP planning maps show the Site as being "Liquefaction damage is unlikely. Standard investigation procedure outlined in NZS3604 is appropriate".

Contaminated land
67. A Preliminary Site Investigation can be carried out for the Site at subdivision stage.
68. An enquiry of ECAN has identified that two sites at the northern end of the Site potentially contain some contaminated land, which can be investigated further at subdivision stage **(Appendix 6)**. 315 Lehmans Road is an unverified HAIL site (previous use for clay target shooting) and 317 is registered as containing uninvestigated persistent pesticide bulk storage.

Servicing
69. Proposals for servicing the Site and the effects from such servicing in relation to domestic water supply, wastewater, stormwater, roading, and telecommunications will be required for any subdivision consent.

Economic effects
70. It is anticipated that urban development will generate positive economic effects, both from the investigation/development phase and for the longer run economic activity from householders participating in the local economy.

Climate Change effects
71. An assessment of the effects of the proposed rezoning on climate change is included as part of the assessment of a well-functioning urban environment above.
72. A well-functioning urban area that is designed and serviced in an integrated manner, applying sound urban design principles, will enable a reduction in greenhouse gas emissions compared to unplanned, ad hoc development that does not create compact urban forms located where the services and benefits of existing, established urban areas are not readily accessible.
73. There is a triangle of planning influence that can be brought to bear on reducing greenhouse gas emissions
a) Compact urban form minimising distances between homes and work/play options.
b) Proximity of homes to community facilities, services and amenities and business/work areas.
c) Design and provision of movement corridors and linkages that create opportunities other than for vehicles for getting

around.
74. The Site of the proposed rezoning:
a) Helps in retaining a compact urban form to Rangiora.
b) Is easily accessible to the town centre and is located convenient to the recreation resources of the nearby Rakahuri/Ashley River, the airfield and racecourse and Arlington Park.
75. Rangiora has excellent connectivity to the City, both via the Northern Motorway, the new Northern Corridor, a cycle way link to Kaiapoi which is linked to the new north city cycle way along the Northern Corridor and a very regular bus service.

Positive effects
76. The proposed rezoning will provide for the continued growth of Rangiora by managing the development through an ODP. The proposal will provide a buffer to on-going high level demand for lots in Rangiora. It will cater for a specific housing need not found in GRZ Zoned land nor LLRZ land. The proposed rezoning is anticipating a form of development that is a much more efficient use of a qualifying site supporting a well-functioning urban area. It is a positive endorsement of Rangiora as a growth node in the District.
77. The benefits derived from a planned ODP approach include facilitating high levels of connectivity, creating community links to identified focal points. The Site is close to recreation facilities. A coordinated and integrated development will provide a distinctive environmental quality and point of difference to the development.
78. The Site adjoins existing and developing residential development on the western edge of Rangiora.
79. From a community well-being perspective, the provision of additional land for residential growth will continue to support the Council's investment in community infrastructure by maintaining and facilitating growth rates, increasing the rating base and attracting development contributions.

STATUTORY PLANNING ASSESSMENT
80. Submissions must be assessed under the provisions of the RMA, including Part 2 and Section 32 (Requirements for Preparing Evaluation Reports).

National Policy Statements
National Policy Statement on Urban Development Capacity (NPS-UD)

81. The NPS–UD applies to this proposal as it is directed at Tier 1 urban environments, and
Tier 1 local authorities which includes Waimakariri District as part of the Christchurch urban environment that is defined in Table 1 of the NPS, and additionally defined as:
any area of land (regardless of size, and irrespective of local authority or statistical boundaries)
that: is, or is intended to be, predominantly urban in character; and is, or is intended to be, part of
a housing and labour market of at least 10,000 people.
82. The NPS-UD recognises the national significance of:
a) Having well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future; and
b) Providing sufficient development capacity to meet the different needs of people and communities.
83. The NPS outcomes are to be achieved through objectives that address:
a) Planning decisions improving housing affordability by supporting competitive land and development markets.
b) Regional policy statements and district plans enabling more people to live in areas of urban environments near centres or areas with employment opportunities, area well serviced by public transport or a high demand for housing in the area.
c) Urban environments developing and changing over time in response to diverse and changing needs of people, communities and future generations.
d) Local authority decisions on urban development being integrated with infrastructure planning and are strategic over the medium term and long term.
e) Local authority decisions on urban development are responsive particularly for proposals supplying significant development capacity.
f) New Zealand's urban environments support reductions in greenhouse emissions and are resilient to current and future effects of climate change.
84. The key method to achieve these objectives is by development of a Future Development Strategy (FDS). This will set out how the Councils will provide for sufficient development capacity over the next 30 years to meet expected demand. There is no FDS for the greater Christchurch Urban Area that meets the requirements of the NPS-UD.
85. Work on development capacity completed for the NPS - UDC 2016 by the Greater Christchurch Partnership as an Update of the existing Urban Development Strategy (UDS) – Our Space 2019 confirmed what there was a shortage of feasible development capacity for future housing in Waimakariri District for the medium (next 10 years) and long term (10 to 30 years) periods. That assessment is now out of date as it does not address the requirements of the NPS-UD; and rates of take up of land have exceeded projected rates.

86. One of the key changes in the NPS-UD is that local authority decisions on urban development that affects urban environments are responsive, particularly to proposals that would supply significant additional capacity. It also amends the required methodology for housing and business capacity assessments.
87. The current CRPS does not meet the new NPS-UD requirement in relation to proposals for significant additional capacity. Regional councils are required to include criteria in the RPS to determine what plan changes will be treated for the purposes of Policy 8 as adding significantly to development capacity as soon as practicable. ECAN has yet to respond to this requirement.
88. The NPS-UD has immediate effect, so in the meantime, proposals such as this submission must be assessed in the context of the overall intent and purpose of the NPSUD as articulated in the NPS-UD objectives and policies. This includes that NZ has well-functioning environments; provides sufficient development capacity to meet the different needs of people and communities; planning decisions improve housing affordability to contributing to competitive house and land markets; and RMA plans enable more people to live near major employment areas, where there is existing or planned public transport, and where there is high demand for housing.
89. The NPS-UD is the higher order document and its requirements override those of lower order documents where there is a conflict, including regional and district RMA plans.
90. Key objectives and policies in the NPS-UD are assessed here:

NPS-UD Objective/Policy	**Assessment**
Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	The proposed development will further enable Rangiora to sustain itself as a well-functioning urban environment by consolidating the residential area close to the town centre, and provide residential development close to public transport links and existing community and commercial facilities including Huntingdon Drive local centre.
Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.	The proposal provides choices in the Rangiora housing market and in doing so supports housing affordability. Whilst the proposal is for a premier larger lot urban residential development, it is important that all sectors of the market are catered for. This will be more affordable than forcing those wanting large sections out to the much larger and very limited areas of LLR D1 development, or having to purchase 2-3 sections in a standard residential subdivision. There Site is in multiple ownership and the landowners are working together to achieve the rezoning. It will bring more competition into the market by bringing new entrants into the market.
Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply: the area is in or near a centre zone or other area with many employment opportunities the area is well-serviced by existing or planned public transport there is high demand for housing or for business land in the area, relative to other areas within the urban environment.	The CRPS is due for review in 2024 but in the meantime the existing CRPS is not in accordance with the NPS-UD 2020. The proposed rezoning is on the edge of the District's largest centre, which offers a wide range of community and business services, and employment opportunities. It is expected that a proportion of future residents will commute outside the township, but as the township and associated business areas e.g. at Southbrook, continue to grow, this is expected to become proportionally less. Rangiora is well serviced with public transport, there is scope for future mass transit PP, and there is a high demand for housing at Rangiora. The Site adjoins the new West Rangiora Development Area, to the south. Extensions of public transport to service this growth area will be readily accessible to the Site.
Objective 6: Local authority decisions on urban development that affect urban environments are: integrated with infrastructure planning and funding decisions; and strategic over the medium term and long term; and responsive,	Whilst not currently identified as a future growth area in RMA documents, the Site is well placed at the township edge to be serviced by existing infrastructure. Some upgrades may be required, which will be investigated further with Council prior to the hearing. See Policy 8 below for commentary on proposals which supply

particularly in relation to proposals that would supply significant development capacity.	significant development capacity
Objective 8: New Zealand's urban environments: support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change	The proposal adjoins the existing built up are of Rangiora, close to public transport links. Its excellent accessibility to Christchurch City, substantially enhanced with the new Northern Motorway extensions, means it is now highly accessible to these nearby major employment areas. Travel distances are relatively short, minimising vehicle miles and the potential for greenhouse gas emissions. There is a cycleway link from into Christchurch City, and regular bus services, including an express route. The Site is inland and not subject to natural hazard risks associated with sea level rise arising from climate change.
Policy 1 – Planning decisions for well-functioning urban environments	Assessed at para 41-50
Policy 2 - Sufficient development capacity Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.	The proposed rezoning is anticipated to provide sections that will be available for the short term (up to 3 years) and into the medium term (3-10 years) if adopting a more conservative outlook. The locational and amenity advantages of Rangiora also favour strong ongoing demand. The PWDP UFD-O1 Feasible Development Capacity for residential activities identifies the need for 6300 residential units in the period 2018-2028, and 7100 residential units 2028-2048. These numbers are derived from Chapter 6 CRPS Table 6.1. and are out of date. Data from the Council (November 2021) confirms that there are about 800 vacant lots in Rangiora. Building consents are at about 180/year. That means there is about 4 years vacant land supply. A lead in time of 3-5 years is needed to go from rezone to house build so the Council is facing an unnecessary squeeze on land availability. That will translate in to an upward shift in land and section prices as has been the case at Rolleston. The data suggests that the PWDP will be late to the party to ensure there is at least sufficient development capacity to meet expected demand for housing land over the short term, medium term, and long term. There is a looming, inevitable land supply issue so any proposal to add capacity will push the Council closer to meeting the requirements of the NPS-UD. The proposal is consistent with ensuring there is at least sufficient land supply for housing.
Policy 8 – Responsiveness to plan changes Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is: (a) unanticipated by RMA planning	The proposed rezoning is not anticipated by RMA documents - it is not a Greenfield Priority or Future Development Area in the CRPS, or a New Development area in the PWDP. A responsive approach to the proposal is required as it meets the Policy 8 criteria for unanticipated zoning. It will contribution to well functioning urban environments and will add significant development capacity. There is no development capacity for the housing typology proposed – so any provision is significant in this context. The development will deliver appx 311 high amenity large lot residential sites at an average density of 1500m2. This will be higher if a mix

documents; or
(b) out-of-sequence with planned land release

of densities are proposed, which may be appropriate in some parts of the Site, dependent on master planning work to follow.

91. Adopting the submission to re-zone the land, and enable the proposed development on the submission Site will satisfy the objectives and policies of the NPS-UD.

Proposed National Policy Statement for Highly Productive Land (NPS-HPL)

92. The Government proposed in 2019 a NPS-HPL to prevent the loss of productive land and promote its sustainable management. The overall purpose of the proposed NPS-HPL is to improve the way highly-productive land is managed under the Resource Management Act 1991 (RMA) to:

a) Recognise the full range of values and benefits associated with its use for primary production
b) Maintain its availability for primary production for future generations
c) Protect it from inappropriate subdivision, use, and development.

93. The NPS-HPL is still a proposal and not intended to take effect until after Gazettal. At the date of this submission the NPS-HPL has no effect and no assessment of it is required for the purposes of this submission.

94. The Proposed NPS-HPL interim definition of HPL is land defined as Land Use Capability Class 1-3 soils. A portion of the Site contains Class 2 and 3 soils (see **Figure 10)**. Highly productive use of these soils is not realistic given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production). Its present use as lifestyle blocks, low level grazing and agistment is the more likely long run use of the Site if not rezoned.

95. Objective 3 of the Proposed NPS-HPL specifically refers to highly productive soils being protected by avoiding *"uncoordinated urban expansion on highly productive land that has not been subject to a strategic planning process"*. The Site was assessed through a strategic planning process (WDDS 2018) and the RRS as a preferred site for LLRZ development, and rejected for a change in zoning on the basis that it may be required for long term urban growth of Rangiora.

96. It is therefore considered that this submission to re-zone the Site is largely in accordance with the Proposed NPS-HPL.

National Planning Standards

97. The National Planning standards prescribe various matters under the RMA so that there is consistency among planning documents most relevantly here in terms of appellations for zones, and the standards applying to these zones.

98. The proposed rezoning adopts the standard zone appellation, in this case LLRZ as contained in the PWDP.

99. The PWDP identifies plan standards for minimum and average net site areas for the respective zones. These are modified for the proposed rezoning as a higher density LLRZ.

100. The higher density LLR zoning is entirely consistent with the NPS purpose for the LLRZ as reproduced below. In this case, the principal constraint to more intensive development is the peri-urban location where a lower density transition to the rural environment is appropriate (particularly noting that the zone boundary is 'mid block' so there is no natural or physical buffer between rural and residential areas); the existing pattern of 4 ha lots with existing substantial homes and gardens; and the fact that the premier large lot subdivision proposed relies on consistency of housing quality and character to be deliver on this vision for the area.

Large lot residential zone

Areas used predominantly for residential activities and buildings such as detached houses on lots larger than those of the Low density residential and General residential zones, and where there are particular landscape characteristics, physical limitations or other constraints to more intensive development.

Low density residential zone

Areas used predominantly for residential activities and buildings consistent with a suburban scale and subdivision pattern, such as one to two storey houses with yards and landscaping, and other compatible activities.[2]

Canterbury Regional Policy Statement 2013 (CRPS)

101. Chapter 6 of the RPS *"provides a resource management framework for the recovery of Greater Christchurch, to enable and support recovery and rebuilding, including restoration and enhancement, for the area through to 2028. Recovery in Greater Christchurch is also supported by the provisions in Chapter 5 notated as 'Entire Region'. The provisions in the remainder of the RPS also apply.3"*

102. An assessment of the proposed rezoning against the relevant CRPS Objectives and Policies is set out in **Appendix 1**. This should be read in the context of the CRPS being overdue for review and that it does not provide a regional response to the NPS-

UD. The
need to focus on earthquake recovery has now passed and so many of the directive provisions need to be given appropriate 'weight' in a new national policy environment with a focus on flexible, responsive panning approaches that better provide for people's needs and well-being.

103. That assessment shows that

a) The development proposal achieves the objectives for the location, design and function of new developments (Objective 5.2.1)

b) The traffic effects of the proposal are unlikely to give rise to adverse effects and so achieves CRPS objectives for the strategic land transport network (Policy 5.3.7)

c) The Site falls outside the FDAs shown on Map A of Chapter 6 and in that regard is inconsistent with RPS Policy 6.2.1 clauses 1 to 3.

1. identifies priority areas for urban development within Greater Christchurch;

2. identifies Key Activity Centres which provide a focus for high quality, and, where appropriate, mixed-use development that incorporates the principles of good urban design;

3. avoids urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS

d) The environmental effects assessment outlined above establish that the proposed development is consistent and will not give rise to any concerns with respect to all the matters listed in RPS Policy 6.2.1 clauses 4. to 11. These matters are:

6.2.1 Recovery framework

Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that:

1. As above;

2. As above;

3. As above;

4. protects outstanding natural features and landscapes including those within the Port Hills from inappropriate subdivision, use and development;

5. protects and enhances indigenous biodiversity and public space;

6. maintains or improves the quantity and quality of water in groundwater aquifers and surface waterbodies, and quality of ambient air;

7. maintains the character and amenity of rural areas and settlements;

8. protects people from unacceptable risk from natural hazards and the effects of sea-level rise;

9. integrates strategic and other infrastructure and services with land use development;

10. achieves development that does not adversely affect the efficient operation, use, development, appropriate upgrade, and future planning of strategic infrastructure and freight hubs;

11. optimises use of existing infrastructure; and

12. N/A

e) The proposed rezoning achieves policies relating to:

- Sustainability;
- Integration of transport infrastructure and land use;
- Urban design; and
- Biodiversity, natural hazards, landscape, soils, contaminated land.

104. In terms of the CRPS polices for rural residential developments (Policy 6.3.9) the proposal sits square with all policy matters other than being a location identified in an adopted Rural Residential Strategy; and being at a higher density than provided for under this policy (ie greater than 1-2 hh/ha). As such it has a majority of features entirely consistent with the policy.

105. The CRPS includes housing capacity targets as below

6.2.1a Targets for sufficient, feasible development capacity for housing [inserted in accordance with sections 55(2) and 55(A) of the Resource Management Act 1991, from the National Policy Statement on Urban Development Capacity 2016]

For the period 2018-2048, sufficient, feasible development capacity for housing is enabled in Greater Christchurch in accordance with Table 6.1.

Table 6.1 Targets for housing development capacity in Greater Christchurch, 2018-2048

106. These derive from Our Space, under the requirements of the then NPS-Urban Development Capacity 2016, since replaced by the NPS-UD 2020. The targets (known as bottomlines in the NPS-UD) are to be treated as 'minimums' not 'maximums'.

Policy 6.3.12
enables urban development in the Rangiora and Kaiapoi FDAs (new Development Areas in the PWDP) where needed to meet the medium term targets. This a 'minimum' allocation approach contrary to the NPS-UD. The NPS-UD favours over allocation, including in locations unanticipated by RMA plans, where it will add additional development capacity, can be integrated with infrastructure planning and funding, and will contribute to well functioning urban environments – as is the case the proposed Lehmans LLR D2 zone.
107. The proposed Lehmans LLR D2 zone is consistent with the CRPS except with respect to those parts of the CRPS which are out of step with and do not give effect to the higher order plan, the NPS-UD.

Proposed Waimakariri District Plan
108. An assessment of this proposal against the relevant PWDP Objectives and Policies for urban growth and development as notified on 17 September 2021 is set out in **Appendix 2.**
109. That assessment shows that the proposed rezoning is entirely consistent with the relevant objectives and policies, including as sought to be amended by this submission. Those amendments are to UFD-P3 Identification/location and extension of Large Lot Residential Zone areas; and LLRZ-O1 and LLRZ- P1-5 and reflect the intent and outcomes intended for the proposed LLRZ D2 zone, which is a higher density LLRZ zone than the PWDP LLRZ zone (renamed LLRZ D1 in this submission).

ASSESSMENT AGAINST OTHER PLANNING DOCUMENTS
Our Space 2018-2048 Greater Christchurch Settlement Update (2019)
110. Our Space is a non-statutory document prepared under the Local Government Act. It
"responds to the new Government Policy Statement on Land Transport, which has increased funding for mass public transit schemes, and meets the requirement of the National Policy Statement on Urban Development Capacity (NPS-UDC) 2016 to prepare a
future development strategy…. Specifically, it:
• sets out how targets for housing for the next 30 years will be met, accommodating an additional 150,000 people;
• identifies locations for housing growth, encouraging Central City and suburban centre living while providing for township growth in Rolleston, Rangiora and Kaiapoi;…
• promotes a compact urban form, which provides for efficient transport and locates development in a manner that takes into account climate change and sea level rise.[4].

..Underpinning this settlement pattern approach is the vision for a transformation of the transport network that fosters much greater public and active transport usage, and reduced reliance on the private vehicle.
111. Our Space acknowledges that this will require commitment from the Government to invest in the necessary improvements to our transport system, which could include investing in rapid transit services. To date, there has been no successful business case for improved public transportation, including not as a Covid 19 fast track infrastructure project.
112. The Our Space housing capacity targets (Table 3) and Future Development Areas are related to growth of urban areas.
113. Our Space, like the CRPS (and the Operative District Plan) are now out of date, as they do not reflect or give effect to the new requirements of the NPS-UD.

Waimakariri 2048 District Development Strategy (WDDS)
114. The preferred growth directions for Rangiora in the WDDS 2048 (2018) are outlined above (under 'Site') i.e. westwards to Lehmans Road, and otherwise eastwards. However, the Council in its decision on the RRS, recognized west of Lehmmans Road as a potential longer town urban growth area.
115. The WDDS Rangiora Snapshot (pp38-39) -when looking ahead to 2048 proposed that:
a) Rangiora remains the District's largest town
b) 30,000 – estimated population (2048)
c) 12,025 – estimated households
d) 5,025 - new households in Rangiora
e) Continues to accommodate one third of the District's residential growth
f) 167 – estimated annual building consents for new dwellings for the next 30 years
g) 423 hectares of additional feasible residential land required by 2048 (this includes capacity in remaining stages of existing residential developments as well as new greenfield areas inside and outside of the Infrastructure Boundary)
h) Future residential growth directions proposed to the east (predominantly) and west of the current town
i) Opportunities for intensification/regeneration to be identified
j) New growth directions take into account areas of unacceptable natural hazard risk and areas of significant environmental and cultural values
k) New growth areas to connect into existing sewer and water networks

l) Stormwater Levels of Service designed to meet increased performance requirements

116. At the 2018 Census Rangiora had a population of 17,841, and 7314 total dwellings (incl those unoccupied and under construction). Population projections for the District show an average annual change 2018-2020 of 1700 persons. If Rangiora continues to attract a third of all district growth as stated in the WDSS then Rangiora's population in 2021 will be around 18,900.

Mahaanui Iwi Management Plan

117. Part 1 of the PWDP in a section "Mana Whenua" sets out the position with respect to iwi and the review of the district Plan:

a) The District's territorial area sits within the takiwā (territory) of Ngāi Tūāhuriri which is one of eighteen Ngāi Tahu regional papatipu rūnanga, constituted under the ***Te Rūnanga o Ngāi Tahu Act 1996*** *to represent* ***mana whenua*** *interests.*

b) The preparation and change of a district plan must take into account relevant iwi documents. For the District, Ngāi Tahu has set out its resource management values, issues, objectives and policies within the Mahaanui Iwi Management Plan (2013).

c) The Mahaanui Iwi Management Plan identifies objectives, issues and policies for natural resource and environmental management for six pāpatipu rūnanga (including Te Ngāi Tūāhuriri Rūnanga). It seeks to ensure that the taonga and resources of Ngāi

Tahu mana whenua are recognised and protected in the decision-making of statutory agencies. The Mahaanui Iwi Management Plan contains a comprehensive suite of policies and objectives addressing the range of resource management matters of significance to tangata whenua. The District Council shall have regard to the Mahaanui Iwi Management Plan when preparing or changing the District Plan, to the extent its content has a bearing on resource management issues of the District.

118. The Mahaanui Iwi Management Plan (MIMP) 2013 was released on 1 March 2013.

119. The MIMP is a tool for tangata whenua to express their identity as manawhenua and their objectives as kaitiaki, to protect their taonga and resources, and their relationships with these. The MIMP seeks to ensure that these taonga and resources are recognised and protected in the decision-making of agencies with statutory responsibilities to tangata whenua. Importantly it is also a tool that assists Papatipu Rūnanga representatives to articulate their values, issues and policy into statutory processes.

120. The MIMP includes both general objectives and policies about the management of land, air, and water, and also includes catchment specific objectives and policies.

121. Section 5.3 Wai Maori (pp77-98) contains an extensive discussion about tangata whenua rights and interests in freshwater. It provides a suite of Issues, Objectives and Policies for freshwater

122. Section 5.4 Papatuanuku (pp101-124) sets out the Ngai Tahu Subdivision and Development Guidelines that are to be read along-side objectives relating to:

a) Land use planning and management in the takiwā reflects the principle of Ki Uta Ki Tai. (from the mountains to the sea)

b) Rural and urban land use occurs in a manner that is consistent with land capability, the assimilative capacity of catchments and the limits and availability of water resources.

c) Inappropriate land use practices that have a significant and unacceptable effect on water quality and quantity are discontinued.

d) Ngāi Tahu has a prominent and influential role in urban planning and development.

e) Subdivision and development activities implement low impact, innovative and sustainable solutions to water, stormwater, waste and energy issues.

123. Section 5.5 Tane (pp127-137) includes objectives that focus on:

a) Regional policy, planning and decision making in the takiwā reflects the particular interest of Ngāi Tahu in indigenous biodiversity protection, and the importance of mahinga kai to Ngāi Tahu culture and traditions.

b) The customary right of Ngāi Tahu to engage in mahinga kai activity is recognised, protected and enhanced…

c) Customary use, and therefore mahinga kai, is given effect to as a first order priority for freshwater management in the takiwā.

124. Section 6.4 (pp213-224) addresses issues of particular significance to the lands and waters of the Waimakariri catchment within which the Site lies.

125. Relevant Objectives relating to urban development of land in that catchment include:

a) The natural "energy, vitality and life" of the Waimakariri River as a braided river is protected and restored.

b) The discharge of contaminants to the Waimakariri and its tributaries is eliminated.

c) Water quality and flows in the Waimakariri and its tributaries are improved to enable whānau and the wider community to have places they can go to swim and fish.

d) The mauri and mahinga kai values of the Waimakariri and its tributaries and associated springs, wetlands and lagoons are protected and restored; mō tātou, ā, mō kā uri ā muri ake nei.

126. A key issue relating to subdivision and development is that subdivision and development activities in the lower catchment

have the potential to adversely affect Ngāi Tahu values such as waterways, mahinga kai and sites of significance (Issue Wai4).
127. The proposal provides for full urban reticulation of the three waters and is consistent with the objectives and policies contained in Chapters 5.3 and 5.4 of the MIMP. The proposal does not preclude individual land owners from installing rainwater collection and use from roof areas at the time of building development.
128. The proposal has been designed taking into consideration the potential effect of resultant subdivision and development on the rivers and streams that flow into the lowland rivers.
129. Overall it is considered that the proposal will not have adverse impact on the cultural values of iwi as set out within the MIMP.

SECTION 32 ASSESSMENT

130. A Section 32 assessment is contained in **Appendix 3.**
131. In summary, the PWDP zoning and associated rules (RLZ Zone with a minimum lot size for subdivision and a dwelling 4ha) do not meet the needs and aspirations of the current owners.
132. Strategic Council planning documents (specifically the WDDS) have a focus on only meeting urban growth demands within urban environments of existing towns. They favour intensification (15hh/ha) and a strict allocation of capacity by development areas. It is a control and command regime consistent with Map A of Chapter 6 of the CRPS but is out of step with the requirements of the NPS-UD which requires a more flexible, responsive approach, prohibits a hard fixed unmoveable urban/rural boundary.
133. This approach leaves little room for new proposals or proposals that do not sit square with the standard array of GRZ/medium density or SETZ (Settlement Zone). SETZ applies to some of the District's smaller settlements outside Greater Christchurch.
134. Neither LRZ nor Large Lot Residential (LLRZ) as notified in the PWDP is an efficient use of this block of land located as it is immediately adjoining the urban area of Rangiora, and in a location easily accessible to the town centre by active transport modes as well as car and several district reserves.
135. If this Site is not zoned for LLRZ D2 (minimum average lot size 1500m^2) use to enable residential re-development then it will drive pressure to re-zone elsewhere. That step potentially will not have the significant benefits to Rangiora long term in relation to enabling a well-functioning urban environment that enables people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future. Additionally re-zoning to LLRZ D2 will contribute to providing additional development capacity to meet the different needs of people and communities in a planned manner and consistent with the NPS-UD.
136. The Site can readily be developed to reflect the principles of the Urban Design Protocol with values of character, context, and connectivity.
137. The Section 32 assessment concludes that the proposal to re-zone the Site from LRZ zone to LLRZ D2 Zone (average lot size 1500m_2) is the most appropriate method for achieving the objectives of the proposal, than the other alternatives considered.
138. Option 2 identified in the s 32 assessment is consistent with some PWDP policies notwithstanding that it does sit square with the strategic intentions signaled in the WDDS and the PWDP approach to providing for development capacity and urban development.
139. Option 2 identified in the s 32 assessment to re-zone the Site is the most appropriate given:
a) The proposals adopt the PWDP zones, development and activity standards with appropriate amendments. This ensures continuity of the District Plan anticipated environmental outcomes and urban amenity for Rangiora and adjoining residential areas;
b) Will be consistent with and give effect to many of the relevant PWDP objectives and policies;
c) It is a logical extension to the developed and developing residential land adjoining the Site while achieving a compact, efficient urban form that removes pressure on isolated rural land elsewhere around Rangiora.
d) It gives effect to the NPS-UD, specifically Objective 6 c) and Policy 8, delivering significant additional development capacity and contributing to a well functioning urban environment.
e) It is assumed that there will be capacity in the public utilities and the existing road network, including planned upgrades, to accommodate the traffic effects of the redevelopment;
f) The proposed Site specific ODP will provide certainty of the final form and disposition of the re-zoned area including its proposals for reserves, roading, future linkages for pedestrian and vehicular traffic.
140. The re-zoning proposal is considered to be appropriate to achieve the sustainable growth and development of Rangiora.
141. The economic, social and environmental benefits of the proposed rezoning outweigh any potential costs.
142. The overall efficiency and effectiveness of the proposed rezoning (Option 2) is high, in comparison to the alternative options set out in the s 32 Assessment which are low (Options One and Four) or low to moderate (Option Three).
143. The PWDP proposes to release land for development in the new Development Areas at Rangiora and Kaiapoi through a novel and untested certification process that is not clearly derived from RMA statutory powers, nor Local Government Act 2002 (LGA) authority. This approach is not proposed for the LLR Overlay areas. As the proposed Lehmans Road LLR D2 zone proposed by this submission seeks large lot urban densities, it is anticipated that Council may favour the certification process if it accepts the proposed rezoning. This is opposed – rezoning to LLRZ D2 is sought.
144. Potential difficulties with the proposed certification process are identified and discussed in the Section 32 Assessment.

(**Appendix 3)**. In summary, the process is hugely discretionary, does not provide conventional rights to an applicant (eg right of objection/appeal) meaning decisions cannot be challenged, and it is not apparent that the process will be appropriately documented with a transparent record of the decision-making within the certification process. Further uncertainty arises in the practicalities of how to negotiate and manage the staging, funding and building of key infrastructure across a range of Sites, and a risk that land supply is controlled by a limited number of large developers. It is a far less efficient and effective method for delivering land for housing than the Council rezoning the land in the PWDP.
145. The proposed rezoning is considered to be the most appropriate, efficient and effective means of achieving the purpose of the RMA.

CONSULTATION
146. The landowners and their consultants have submitted on the WRRS and the WDDS (**Appendix 4)**.
147. The submissions to re-zone as rural residential or identify the Site as suitable for LLRZ have been rejected as noted above. LLRZ but at higher densities as now proposed is considered to be a more efficient use of the land and better meets market demand. 5000m^2 sites provide more land is needed for a spacious home and garden.
148. The landowners have been consistent in their wish to find a zone and possible land uses better suited to their needs.

CONCLUSION

173 The submission seeks to rezone 58 ha of land adjoining Rangiora from Lifestyle Rural Zone (LRZ) to Large Lot Residential with a specific density standard (LLRZ D1), minimum average lot size 1500m^2.
149. The Site has a long history of rural lifestyle use. It is not significantly restricted by potential natural hazards especially flooding, nor does it have physical limitations for development for residential purposes as it is not liquefaction prone, and has no known geotechnical limitations but does contain an area of LUC 2 soils. It is near a site of significance to iwi (SASM – 025) being the Rakahuri/Ashley River The Site has access to a collector road and is near to a strategic road giving direct access to the town centre and a range of community amenities and facilities.
150. The Site immediately adjoins the urban area of Rangiora, and is well located to join in to Council utility services. It is well suited for conversion to residential use.
151. The Site is not identified within the westward growth direction for Rangiora in the District Development Strategy 2018 nor is it part of the DEV-WR development area which adopts Lehmans Road as its western boundary. It is in a location that achieves coherent and compact urban form offering ease of access to business services, community facilities, reserves and the primary road network.
152. The proposed rezoning provides for a connected and high amenity residential living environment not presently available under the PWDP while avoiding and/or mitigating any potential adverse effects on the environment. It will provide for continuing high demand for a variety of high quality residential sections aimed at a particular segment of the housing market in an ideal location, easily accessible to the existing town centre services and facilities. It will broaden the range of housing available. As such, it is consistent with the NPS-UD including Objective 6c) and Policy 8, to be responsive to proposals which supply significant development capacity and contribute to a well functioning urban environment.
153. The use of this Site for residential purposes can be a sustainable and efficient use of land and infrastructure. The proposed rezoning better provides for the social, economic, environmental well-being of the landowners and the Rangiora community than continuation of the current low intensity lifestyle land use on 4ha blocks, or a conventional LLRZ residential use.
154. Any potential adverse effects of the implementation of the proposed rezoning can be assessed at subdivision stage but there has been no restriction on servicing the blocks to date. Capacity will need to be confirmed for infrastructure, power and road network. Any future subdivision of the Site will need to confirm water supply and wastewater treatment and disposal options.
155. Rezoning of the site to LLRZ zone is not inconsistent with the policies and objectives of the PWDP, but it is at odds with the dated CRPS approach to provision of urban growth and housing capacity for Greater Christchurch, to the extent that it is not within an FDA created by Change 1 to the CRPS and is not identified as an LLRZ site under the strategic RRS prepared by the Council.
156. As the proposal helps achieve the purpose of the RMA, and has been shown to be consistent with the relevant provisions of the NPS-UD, the submission can be accepted by Waimakariri District Council.

Original Submission

Summary Reasons for the Submission

The reasons for our submission are outlined below.
a) The preferred relief (**the proposed rezoning**) is both appropriate and necessary to achieve sustainable growth and

development of Rangiora and the District and meet the requirements of the National Policy Statement for Urban Development 2020 (**NPS-UD**).

b) The Site identified in Figure 1 and at para 1 of the Preferred Relief above is a logical and preferred location that lends itself to a specific type of housing development not provided within the PWDP as a residential option adjoining but outside the existing urban areas. Nowhere is it possible to develop in a comprehensive, coordinated way a low density, high quality residential environment in the District's towns, the Rural Lifestyle Zone or Settlement Zone as a permitted activity.

c) The requirement for 12/15 hh/ha in GRZ zones (the majority of land in urban areas) drives development to modern scale relatively small urban lots best produced as a package across a significant land holding. The GRZ subdivision standards do not provide for the needs of people who seek a generous sized urban lot residential setting. This is a housing sector that is running against the planning tide of intensification but is, nonetheless, a legitimate form of housing in an appropriate setting. The barriers to such development in urban areas requires an appropriate setting/ location in the rural areas but close to or adjoining the urban areas and at a much lower density than is desired or appropriate (the PWDP LLRZ) to meet the housing needs for generous sized urban lot residential living..

d) The PWDP subdivision standards for LLRZ require lots that are very large for those whose primary interest in a rural setting is a form of residential living, not one that requires significant maintenance and management often involving animals or machinery at scale. Conversely, the GRZ subdivision standards do not provide for the needs of people who seek a large lot residential setting

e) The focus in the PWDP is on prescribing a limited range of residential options and tightly controlling and constraining housing choice within those options. Further urban growth is also tightly constrained and controlled around DEV areas around Rangiora and Kaiapoi but for a very specific form of residential development driven off density requirements that do not match the needs of all landowners.

f) The focus in most new District Plans, driven in part by the National Planning standards, is to simplify the range of zones, to standardize lot sizes, to supposedly create efficiency and certainty through ease of administration of the District Plans. This is done by constraining housing and land development choices by lot size, by location, by built standards and the disposition of built/open elements in a site. However, the National Planning standards do provide for large lot urban residential living, a residential living option which has not been taken up the PWDP (due most likely to the restrictive provisions of the CRPS which only prescribe one from of lower density residential living, at a density of 1-2 hh/ha).

g) This planning approach may be a standard approach to resource allocation but it does not provide a flexible, responsive approach to innovative and new development options. The Government is creating policy settings that on one hand seek intensification in urban areas, while at the same time pushing away from a land allocation model of planning. The PWDP in striving to face both policy directions has a package of measures that are in fact a major barrier in terms or cost, timeframes and certainties for proposals that are not cut from the suite of housing and development options set out by the PWDP. The allocation of land in preferred development areas, it must be said, runs counter to the Government's push, and now its direction, to free up land for development, to encourage innovation in housing (presently with a focus of intensification) and to make available a range of responses to the need to meet the housing needs of people and communities set out in the NPS-UD.

h) While the weight of demand (and the planning response) is around affordable housing, around small lots and dense development that supports investment in public facilities and amenities such as public and active transport, reserves, and commercial services, there is always a wide spectrum of preferences at play in the housing market. The demand for high quality, generous houses set on generous sized parcels of land within high amenity settings is an important and no less relevant housing sector. There is a strong unmet demand, as confirmed by advice from Bayleys real estate (**Appendix 5**) for larger family homes with room for a pool or similar. Purchasers want to be close the amenities of Rangiora and within walking and cycling distance of local schools. They do not want the only available options – a 4 ha lifestyle block or 5000m^2 rural residential site at Mandeville or Ohoka.

i) Interestingly enough for a nation built on the so-called quarter acre paradise, recent policy and planning interest in housing and land development has now seemingly positioned the 1011m^2 section as a luxury item, as the antithesis of providing for community well-being and needs. It is as though the old quarter acre of itself acts against building a sense of community despite being able to be developed in a planned, structured, coordinated or integrated manner. Rather than being a frivolous discretionary item in land development
and housing choice, a well-planned, well located and properly serviced low density residential environment has much to offer urban environments. They can be tactically used to provide shape and edge to urban areas, they can provide a mass of amenity different from (and potentially complementary to), but no less legitimate in urban outcome terms, to conventional GRZ zoned land.

j) In many ways the approach of a district plan to the role and place of the old quarter acre is not dissimilar to the issues faced by comprehensive retirement villages when first proposed. The idea of dense, almost gated and self-contained communities, with multi storey buildings also did not sit well in many district plans. But now they are accepted as an important part of the urban fabric catering to a specific demographic and health demographic. Most plans enable them.

k) Provision for low density residential in an urban setting, or failing that likelihood, in an adjoining rural zone is a fundamental gap in the district plan.

l) The submission seeks to provide for another housing typology not provided in the PWDP and in a location with significant planning merit. The planning case was made out in a detailed submission to the proposed Rural Residential Strategy (**RRS**) for

the land identified in this submission to be “reserved” for conventional Rural Residential zoning in the review of the District Plan. That submission was rejected in favour of a decision ascribing an unspecific strategic significance to Lehmans Road as the urban boundary; simply the decision was that rural residential development here would preclude this area as a future urban growth path, even though this was likely to be very long term as the Waimakariri District Development Strategy (WDDS 2018) for the period up to 2048, does not favour urban growth west of Lehmans Road.

Officer Recommendation

Continue to exclude the area west of Lehmans Road and the racecourse land at Rangiora as growth areas as these were originally considered but not included in the draft RRDS as they trigger the key preliminary criteria of: being on the direct edges of a main town outside of the Projected Infrastructure Boundary (PIB) thereby foreclosing more intensive long-term urban development, and…

Panel Recommendation

The panel accepted the officer recommendations to exclude areas on the fringes of Rangiora in the final RRDS due to these having the potential to foreclose more intensive long-term urban development of the town.

m) In light of the above decision on the Waimakariri Rural Residential Strategy, the proposal now is for a form of high amenity low density urban zoning, which whilst in demand is entirely absent from the PWDP. This will be a long term urban form of development. The proposal set out in the submission will achieve a compact, and efficient, urban form on the edge of Rangiora with excellent connectivity by multiple transport modes. It provides for continuous urban development by enabling a built form which can act as a strong zone or urban boundary.

n) The proposed rezoning will accommodate approximately 311 LLRZ lots1 at the proposed amended density standards for LLRZ D2 (average size 1500m^2). It will contribute to a well-functioning urban environment, meeting the NPS-UD Objective 6(c).

o) Any adverse effects on the environment arising from the proposed rezoning will be minimal, if any, and can be adequately mitigated. A high amenity master planned development is proposed.

p) Significant positive effects arise from the proposed rezoning. It will enable the short term housing demand at Rangiora to be met, and can deliver a housing typology for which there is demand, on lots that are not a burden to the landowners (which is the case for 4ha and the very limited areas of LLRZ D1 with a density of 1-2 hh/ha) and for which there is no provision in the PWDP. At present rates of land uptake there is about 4 years vacant land supply in Rangiora. Given it takes 3-5 years to bring land from zoned state to on the market as developed lots, there is some urgency in providing additional capacity. This proposal helps address an anticipated shortfall in residential zoned plan enabled land.

q) There is no additional cost to the Council in re-zoning the Site as there is expected to be capacity in the public utilities and the existing road network, including planned upgrades.

r) Amendments to PWDP objectives and policies may be necessary to provide for a higher density LLRZ, but of themselves will not act against those relating to Strategic Directions Urban Form and Development and Urban Growth. The PWDP approach to zones and
identification of future development land is already out of step with higher order Resource Management Act 1991 (RMA) statutory documents because they do not give effect to the NPS-UD (and are sought to be amended through this submission).

s) The alternatives of retaining Rural Lifestyle or Large Lot Residential zone across the entire Site are not an efficient use of land which immediately adjoins the urban area of Rangiora, and is highly accessible to the town centre by active transport modes as well as car.

t) The proposed rezoning is consistent with and the most appropriate, efficient and effective means of achieving the purpose of the RMA.

The Site

1. The Site is a 58ha block of land (‘the Site’) accessed from Lehman Road, Rangiora **(Figure 1)**. It is owned by the two submitters and 12 other landowners.

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1 Assumes 20% of land area taken for servicing including roading, reserves and stormwater management if required.

Figure 1: The site (outlined in blue (Google Earth)

2. The Site is surrounded by RLZ land that is used for a mix of lifestyle and conventional farming. To the NE is the Rangiora Eco Holiday Park, and beyond the Park is the Rangiora Racecourse about 300m away from the nearest lot and 1km from the centre of the Site. Land to the south east is GRZ and part of urban Rangiora with newly developing residential land west of West Belt. About 1.9 km to the NW is Rangiora Airfield. About 1km north of the most northern lot is the Ashley River.
3. The southern-most lot in the proposal with the Rangiora Vet Clinic faces, but does not have access to Rangiora-Oxford Road (State Highway 72). This arterial road provides the main road connection in to the centre of the town. The well-established Fernside Rural residential area is about 2.5km west from the junction of Lehmans and Rangiora-Oxford Roads.

Figure 2: the site is a broader context (Site marked red)

4. The Site is not identified as lying within a preferred growth direction for Rangiora in the Waimakariri 2048 District Development Strategy (2018) (**WDDS**) **(Figure 3)**. No land west of Lehmans Road is included in the West Rangiora Development Area (**DEV-WR**) in the PWDP.

Figure 3: Figure 11 WDDS

5. The Council reviewed its strategic approach to the location and provision of Rural Residential land (now zoned LLRZ in the PWDP) in the WDSS. It adopted the position that it would:

a) Explore tools such as cluster development to manage rural character

b) For rural residential development, adopt an approach that has a primary focus on creating new rural residential areas, with a secondary focus on enabling large lot intensification within existing rural residential areas where there is sufficient community support and servicing available

c) Review the Rural Residential Development Plan for the whole District (pg 21 WDDS).

6. Rangiora presently has a population of 17,841 (2018 Census). It grew steadily between 2006 and 2018. Growth of Rangiora since then has continued in step with the district growth which has increased 8.2% between 2018 and 2021 from 61,300 to 66,300 at an annual average of 2.8% from 2018 to 2020 (Statistics NZ Subnational population projections at 30 June 2021: provisional).

2006 (count)	2013 (count)	2018 (count)
12,165	15,069	17,841

Statistics NZ

Population projections at 30 June

PLANNING STATUS OF THE SITE

Chapter 6 of the Canterbury Regional Policy Statement

7. An assessment of the CRPS is set out in **Appendix 1** to this submission.
8. The Site is within the Greater Christchurch area.
9. It was not shown as a Greenfield Priority Area – Residential (GPA) on Map A of the Canterbury Regional Policy Statement (CRPS). The GPA terminates at Lehmans Road.
10. As a result of the Minister for the Environment's decision of 28 May 2021 on Change 1 to Chapter 6, an area largely south of Oxford Road and a finger of land to the north of Oxford Road was included as a Future Development Area (**FDA**) (**Figure 4** orange).

Figure 4: Map A Chapter 6 Regional Policy Statement Greenfield Priority areas
Site location identified with red circle (appx)

11. The FDAs are intended to accommodate the increased demand for new dwellings in that part of Waimakariri District within the Greater Christchurch Urban Area and to respond to the NPS-UD. They do not provide "plan enabled" land as they need to negotiate a rezoning process to confirm their status as land developable for housing and other urban purposes.
12. The proposal for a LLRZ zone with average lot sizes of 1500m2 is inconsistent with the policy approach of Chapter 6 for Greater Christchurch, in that if fits none of the residential living typologies provided for in Chapter 6 and is not in a location identified for urban or rural residential development. It sits 'between' the urban and rural residential densities provided for in the CRPS (minimum 10 hh/ha for urban in Waimakariri, and average 1-2 hh/ha for rural residential). The proposed density is appx. 6.66 hh/ha.
13. Notwithstanding, the proposal meets all the location and other criteria in CRPS Policy 6.3.9 for rural residential development. It is:

- Outside the CIAL noise contours
- Has some sites with restrictions from the take-off and landing vectors for Rangiora Airfield but not such as to impact its operational capacity.
- Is outside the groundwater protection zone
- Is not within the Waimakariri stop bank system
- Has no views of or to the Port Hills
- Has good access for emergency services
- Will not create reverse sensitivity issues with adjoining land uses; Rangiora Racecourse is 500m away.
- Free of significant natural hazards and is a flat site.
- Supports no significant natural values or ecological values.
- Contains no SASMs.
- Can be integrated into or consolidated with the existing urban area of west Rangiora.
- Contains no surface water bodies so there will be no adverse impacts on these.
- The development will be contingent on an ODP to provide integrated design for subdivision and land use, and provide for the long-term maintenance of a high quality high density rural residential character.
- The proposal is not intended as a staged development towards full urban; rather it is intended to provide a unique residential environment that can stand alone and contribute to the urban fabric of Rangiora like Palmview in east Rangiora, or as Kaiapoi Lakes does for Kaiapoi.

14. Overall, the proposal is not consistent with Chapter 6 but that is more a function of its original purpose when formulated in 2013. Notwithstanding that, the submission for a lower density residential focussed, high quality urban environment that attaches to an existing urban area and that promotes a coordinated pattern of development has planning merit.

Operative Waimakariri District Plan
15. The Site is zoned Rural in the Operative Plan. The minimum lot size for subdivision and a dwelling is 4 ha.
Proposed Waimakariri District Plan
16. The Site is zoned Rural Lifestyle Zone **(LRZ) (Figure 4).** The minimum lot size for subdivision and a dwelling in the LRZ is 4 ha.
17. Oxford Road is a strategic road and Lehmans Road is a collector road.

Figure 5: Proposed District Plan Zoning (site outlined in red)

18. The Site is also subject to, or potentially influenced by, a number of Overlays:
    a) Rangiora Airfield Take Off Climb and Approach Obstacle Limitation Surface (**Figure 6**)
    b) National Grid Transmission Lines (**Figure 6**)
    c) Liquefaction: Liquefaction damage is unlikely (**Figure 6**)
    d) Non-Urban Flood Assessment Area (**Figure 7**)
    e) Geographic areas: Ecological Area – Plains

f) Ecological District – Low Plains

Figure 6: Rangiora Airfield Take-off and Approach vectors (blue dashed lines); Liquefaction damage unlikely (green)Transmission lines (green lines); Site outlined in red

Figure 7: Non-urban flood assessment & Waimakariri Flood Hazard maps
Blue – medium risk, green – low risk, white – very low

DEVELOPMENT PROPOSAL AND PROPOSED REZONING

19. Subdivision of the Site will create approximately 311 LLRZ D2 lots.
20. The key design drivers for the proposal are:

a) A high amenity premier residential zone with large houses on large sites – average 1500m^2, min 1000m$_2$ based on the St Kilda, Hamilton development concept (**Figure 8**).

b) LLRZ D2 standards would enable a lower density zone in the medium term e.g. 10 years to achieve a high quality consistent character subdivision. If developed as an integrated development subject to an ODP subdivision can be staged for to the proposal.

c) Creating strong connections with the immediate neighbourhood by providing a cohesive interconnected roading layout that picks up direct links to the eastern neighbourhood off Lehmans Road and the northern subdivision roading, and carries them into the Site.

d) Creating a high amenity and diverse residential neighbourhood by providing interfaces to roads, reserves and rural environments.

e) Respecting and building on local identity and character of Rangiora by retaining specific vegetation features from the Site, and anchoring the development into the wider landscape.

21. A development concept can provide for sound urban design by:

a) A hierarchy of movement corridors.

b) Prioritisation of walking and cycling.

c) A north-south alignment of street blocks to maximize solar access and provide for efficient use of lots.

d) Block perimeters being kept as small as practicable to aid permeability and higher public amenity.

e) Enabling a range of housing typologies set in high quality landscape and street setting with generous amenity plantings and curtilage.

Figure 8: St Kilda development images (Bayleys)

22. St Kilda, Cambridge is a premier development on the outskirts of Cambridge, centrally located and with easy access to the Waikato Expressway. It was originally part of a small dairy operation which was dissected by the Waikato Expressway, leaving a portion within the Cambridge Town boundary and the larger balance of the property of approximately 80 ha (which became St Kilda) on the Eastern side of the Expressway, left in the Rural Zone.
23. The initial development concepts were for a Rural Residential type development given the Expressway separation of the existing residential development on the Western side of the Cambridge Bypass, however this was not supported by Council and a new concept of larger residential sections of a 1600m² average size was developed and approved – see https://www.stkilda.nz/page/location/

EFFECTS ON THE ENVIRONMENT

Township growth and urban form

24. The Site immediately adjoins the western edge of urban Rangiora.
25. The WDDS indicated a general preference for the direction of urban growth of Rangiora to the east as a way of balancing up the residential areas around the town centre and some growth to the west.
26. The approach of the WDDS was to signal growth options to be confirmed in the District Plan Review:

The broad directions for greenfield residential growth for the District's main towns are set out in Figures 11 to 14. Further work will be carried out to identify and confirm the exact locations and extent of these residential growth areas, together with the intensification opportunities within existing urban areas. These will be enabled through the District Plan Review and other planning tools.

27. The Strategic Planning documents clearly signal active consideration of growth needs and growth directions. The options available to the Council were constrained by the approach of the CRPS as the District Plan has to give effect to the CRPS and cannot be
inconsistent with it. The CRPS took effect in 2013 and is overdue for review.
28. The CRPS tightly holds urban growth to the constraints of Map A Chapter 6 and the identified FDAs which although amended by Plan Change 1 in 2020 does not respond to the directions of the NPS-UD. In any event the approach is focused on the need for housing in full urban residential land, less on other residential development forms.
29. As such the Site falls outside the planning policy framework for urban growth. However, in terms of urban form and on the ground, there is considerable merit and logic to conversion of this existing LRZ land to a new high amenity residential form that can be integrated into the Rangiora urban fabric.
30. The proposal has the potential to anticipate the longer term growth path confirmed by the decisions on the RRS to protect the future growth option of more intensive urban development in this direction. It can set a pathway to further westward expansion on land
that holds few if any physical barriers to land development.
31. The proposal will contribute to the housing needs of Rangiora and in a form and location that does not undermine the long run urban form of Rangiora. Planned growth confirmed in the PWDP is already intended to extend westwards out to Lehmans Road and to keep the town edge squared up providing depth to future development and providing a rational basis for providing movement networks driven off the key roads such as Rangiora-Oxford Roads. The West Rangiora Future Development Area confirms this approach. The Site sits in the next block west of Lehmans Road so is not proposing a disjointed urban form, nor one that is not part of the long term thinking of urban form and growth for Rangiora.

32. A full residential zoning is proposed under LLRZ D2 and will provide a high quality street character, overall amenity and passive surveillance over the street, and will create the correct lighting standards, roading standard, fully formed footpaths and cycleways required for a high quality urban environment.

Neighbourhood and wider community effects
33. The Site is serviced by a collector road and is close to an arterial road. This provides for ease of access and safe and convenient movement to and from the Site. A planned development co-ordinated by an ODP can facilitate within the site movement corridors and linkages through the Site to provide for walking and cycling.
34. A key positive neighbourhood and community effect will arise from the existing dwellings and their established gardens and plantings that will anchor new development and provide a point of reference for new dwellings. Development will not be on a bare site; it will take place in an existing established part-residential setting. The transition to a low density, high quality premier residential development will start from a favourable position and minimise the apparent extent and nature of the landscape change.
35. The Site is comparatively large (58.4 ha) and has the potential to support a variety of residential building typologies and this will contribute to a mix of households within the development and provide built form variety and interest in the streetscape. Whilst LLR D2 standards are proposed, it may be that part of the Site is suitable for other higher density forms of development, which would be within scope of the alternative relief, and could be considered as part of the master planning process required for preparation of an ODP (ahead of the hearing). The earlier stages of the St Kilda development were for large lot residential, with more clusters of townhouses included as later stages (and a retirement village). A retirement village is unlikely in this case, given the proximity of the Charles Upham Retirement Village.
36. Rangiora is well-positioned to accommodate and service the needs of a fast-growing resident population that will in turn support more business activity, schools, community facilities and community organisations.

Effects on tangata whenua values
37. The Proposed District Plan does not identify any Sites and Areas of Significance to Maori in the Site, but the nearby Rakahuri/Ashely River identified as SASM-025. This has been scheduled as being
River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species
38. The PWDP has Policy SASM-P8 which is relevant to pre-development processes:
Engagement with rūnanga
Te Ngāi Tūāhuriri Rūnanga and the District Council to encourage engagement with the Rūnanga priorto persons undertaking activities and/or applying for resource consent where the activity has thepotential to adversely affect identified sites or areas of Ngāi Tūāhuriri cultural significance. Where priorengagement with Te Ngāi Tūāhuriri Rūnanga h as not been undertaken by an applicant for an activitythat has the potential to adversely affect an identified site, the District Council will consult with the Rūnanga.
39. The Site is not listed as an archaeological site on the NZ Archaeological Site database.

Landscape and visual effects
40. Rural Lifestyle style development exists on the Site now (a series of 4 ha lots with a dwelling and associated accessory buildings on each). The landscape is dominated by shelter belts, utility buildings, significant trees and planted curtilages around

dwellings many of which are well set back off the roads down RoWs.
41. An ODP will help to achieve an integrated, cohesive and coherent development The proposal will lead to a modification of the landscape of the Site from a predominantly lifestyle block landscape to a denser semi-urban environment dominated by residential building that will, in time, get the benefit of street tree and reserve plantings and landscape treatments around the houses.
42. The visual effects which will arise from a change in the number of vegetative and built elements in the landscape are significant, but not avoidable, if the Site is to contribute to the on-going growth of Rangiora. The change will contribute to a high quality amenity and quality of environment and one that will be entirely consistent with and supportive of the rural lifestyle residential development that has successfully established on the Site.

Well-functioning urban environments
43. The Site adjoins the existing built up urban area of Rangiora. Immediately to the east are existing or developing residential areas.
44. The conversion of the Site from present rural lifestyle uses to low density, high quality residential will continue a pattern of outward expansion of Rangiora. Such a change may not be consistent with the PWDP's identification of a Future Development Overlay for west Rangiora only as far west as Lehmans Road, but on the ground it will look and integrate as part of the urban fabric.
45. It will provide some replacement lower density living areas for the existing LLR zones at north west Rangiora – but at much more appropriate higher density that the LLR D1 standard which is 1-2 hh/ha. There are two such areas, shown on the planning maps below. River Road has an 'urban overlay' and is intended to be intensified to urban densities. The land on the opposite (east) side of Lehmans Road is a 'legacy' rural residential zoning which applies under the Operative District Plan. The landowners have developed the adjoining residential subdivision and wish to develop the land for full urban residential development. Services are in place to support this. The constraint to date has been Map A of the CRPS which does not include the land as a Greenfield Priority Area or Future Development Area, GR zoning of this land is consistent with the NPS-UD.

Figure 9: PWDP as notified – LLRZs shown in light grey. Diagonal stripes – urban growth overlay.
Site outlined in red.
46. Rangiora is growing apace. It is attracting significant interest from new home buyers as people respond to the significant investment in upgraded transport links (Northern Corridor and public transport) and a growing economic base for employment within the District and the City.
47. Rangiora has excellent connectivity to the City, both via the new Northern Corridor, and a nascent cycleway link into the City. There is a very regular bus service every half hour.(the No 1 Blue Line) The standard trip takes 70 minutes, and there is a twice daily weekday morning express service from Rangiora, and seven times weekday express out to Rangiora all via Kaiapoi.
48. The Site will step out the western edge of Rangiora, but as it exists in a peri-urban form now, such a change does not alter how the Site interacts with Rangiora as a whole. It is in many ways a functional part of urban Rangiora now; it's only the Zone boundaries and policy framework that create the sense of it not being part of Rangiora.
49. The Site is convenient to the Rakihura/ Ashley recreation trails, the racecourse, Arlington Park, and the airfield. The town centre is easily accessible.
50. The following assessment of the criteria in the NPS-UD for determining a well-functioning urban environment shows that the proposed rezoning will deliver urban, housing and residential outcomes that meet those criteria. There will be a variety of homes enabled by generous lot sizes. The Site is well-positioned, building as it does on an existing township well-serviced by public transport and cycling options, to provide good accessibility to jobs, community services, and open spaces, as well as mitigating climate change impacts and future natural hazards by being not near the coast and well removed from major rivers.

NPS-UD Policy 1	
Planning decisions contribute to well functioning urban environments, which are urban environments that, as a minimum:	**Assessment**

(a) have or enable a variety of homes that: (i) meet the needs, in terms of type, price, and location, of different households; and (ii) enable Māori to express their cultural traditions and norms;	The proposal is to have larger lots supporting predominantly standalone dwellings and associated accessory buildings (including generous sized garaging) in an open landscaped garden setting. This will fill a gap in the range of housing typologies available at Rangiora and contribute to a better functioning urban environment overall at Rangiora. It is not necessary for each individual rezoning proposal to have a wide range of housing typologies, and in some circumstances this may not be appropriate. The rezoning will deliver a premier high amenity urban subdivision with generous sized lots which will complement existing and planned higher density residential development at west Rangiora. There is scope with the relief sought for a mix of residential densities. The appropriateness of this can be considered at the master planning/ODP stage. The Site has the potential to create a unique urban environment in Rangiora. It can follow the example of Palmview based on a lake or Kaiapoi Likes providing a niche housing option in Rangiora and the District meeting a need for residential land not constrained to GRZ standards.
(b) N/A business sectors	
(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and	The Site has access to a collector road and a strategic road providing easy access to key community amenities and facilities. The town is served by a public bus route to the city, and a cycle trail connecting to Kaiapoi and the City. The new West Rangiora Development Area adjoins the Site to the south. The Site will become closer to Rangiora public transport routes as they extend out to service this new growth area over time. The Site is in walking distance to Arlington Park and the Rakahuri/Ashley which contains abundant recreations pace. It is easily accessible to the town centre and within walking distance to the Huntingdon Drive local centre.
(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and	The demand for housing and land in Rangiora is largely ahead of the planning means to respond. This proposal will “top up” the land presently set aside in the PWDP and provide a useful buffer to demand. The Site owners have been keen to release this land for more intense development for some time; there is no prospect of land banking.
(e) support reductions in greenhouse gas emissions; and	The Site has significant advantages in being easily accessible to the town centre and reserves, community facilities and schools. The proposal retains a consolidated form to Rangiora with good connectivity and linkages to recreation space and commercial centres reducing the need for car travel.
(f) are resilient to the likely current and	The Site is within the area of influence of a major river but the non-urban flood assessment maps do not show extensive flooding likely at the Site.

future effects of climate change	Being inland it is not at risk from climate change induced extreme natural hazard events like sea level rise. or river flooding.

Effects on ecosystems and habitats

51. The Site is currently used for a mix of low intensity (grazing) farming, and lifestyle purposes. Shelter belts and utility buildings have been established

52. The Site has been identified in the PWDP with two ecological overlays (the PWDP ecological overlay – Plains and Low Plains Ecological District). They are a district-wide overlays and no specific ecological values have been identified in the Proposed Waimakariri District Plan. These overlays seek primarily to retain indigenous vegetation. The PWDP identifies SASM 025 nearby the Site. That is a Site and Area of Significance to Maori and in SASM - Schedule 1 is identified as *being River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species.*

Effects on natural and physical resources

53. The Site drains in a SE direction towards the newly developing residential area.

54. There will be a degree of site disturbance as part of creating the roading network, and reserves, and as part of curtilage development on each lot.

55. The proposed use for residential activity inevitably leads to loss of some rural productive potential as land owner intentions are not about farming or productive use of the land, but lifestyle use and enjoyment. Built forms and hard surfaces become more dominant.

56. The Site comprises 4ha bocks now and these are not able to be used effectively for productive purposes other than for intensive productions based on tunnel housing and other supported production systems. None exist in the Site now.

57. The Site contains Class 2 and Class 3 soils as defined in the NZ Land Use Inventory (Landcare Research) Land Use Capability classes 1-3 **(Figure 10)**. Productive use of these soils other than for low level purposes i.e. grazing, is not feasible given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production).

Figure 10: Site soils: Site outlined in red; (Canterbury Maps)
Class 2 soils: bright green/Class 3 soils: light green;

Discharges of contaminants into the environment

58. There will be no discharges of contaminants into the environment. Wastewater will discharge to the Council's reticulated system.

59. Stormwater discharges will potentially be to ground given ground conditions or to an approved and consented stormwater management and treatment area which will meet all relevant Council standards.

Risks from natural hazards or hazardous installations

60. The PWDP planning maps show the Site as being within a Non-Urban Flood Assessment Area.

61. The District Plan maps do not identify high flood hazard areas or high coastal flood hazard areas, rather these are identified through the flood assessment certification process. This enables the most up-to-date technical information to be used. However, as a guide, areas that are potentially high hazard can be identified through the Waimakariri District Natural Hazards Interactive Viewer (NH - Introduction).

62. Rules that refer to a Flood Assessment Certificate require a certificate to be obtained from the District Council to determine compliance with the relevant rule. The alternative is to apply for resource consent as set out in the rule.

63. Rule NH-R2 states
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;

64. Assessment of flood risk and consequence can be undertaken at subdivision stage.

65. There will be no hazardous installations proposed on the Site.

Geotechnical assessment
66. The PWDP planning maps show the Site as being “Liquefaction damage is unlikely. Standard investigation procedure outlined in NZS3604 is appropriate”.

Contaminated land
67. A Preliminary Site Investigation can be carried out for the Site at subdivision stage.
68. An enquiry of ECAN has identified that two sites at the northern end of the Site potentially contain some contaminated land, which can be investigated further at subdivision stage **(Appendix 6)**. 315 Lehmans Road is an unverified HAIL site (previous use for clay target shooting) and 317 is registered as containing uninvestigated persistent pesticide bulk storage.

Servicing
69. Proposals for servicing the Site and the effects from such servicing in relation to domestic water supply, wastewater, stormwater, roading, and telecommunications will be required for any subdivision consent.

Economic effects
70. It is anticipated that urban development will generate positive economic effects, both from the investigation/development phase and for the longer run economic activity from householders participating in the local economy.

Climate Change effects
71. An assessment of the effects of the proposed rezoning on climate change is included as part of the assessment of a well-functioning urban environment above.
72. A well-functioning urban area that is designed and serviced in an integrated manner, applying sound urban design principles, will enable a reduction in greenhouse gas emissions compared to unplanned, ad hoc development that does not create compact urban forms located where the services and benefits of existing, established urban areas are not readily accessible.
73. There is a triangle of planning influence that can be brought to bear on reducing greenhouse gas emissions
a) Compact urban form minimising distances between homes and work/play options.
b) Proximity of homes to community facilities, services and amenities and business/work areas.
c) Design and provision of movement corridors and linkages that create opportunities other than for vehicles for getting around.
74. The Site of the proposed rezoning:
a) Helps in retaining a compact urban form to Rangiora.
b) Is easily accessible to the town centre and is located convenient to the recreation resources of the nearby Rakahuri/Ashley River, the airfield and racecourse and Arlington Park.
75. Rangiora has excellent connectivity to the City, both via the Northern Motorway, the new Northern Corridor, a cycle way link to Kaiapoi which is linked to the new north city cycle way along the Northern Corridor and a very regular bus service.

Positive effects
76. The proposed rezoning will provide for the continued growth of Rangiora by managing the development through an ODP. The proposal will provide a buffer to on-going high level demand for lots in Rangiora. It will cater for a specific housing need not found in GRZ Zoned land nor LLRZ land. The proposed rezoning is anticipating a form of development that is a much more efficient use of a qualifying site supporting a well-functioning urban area. It is a positive endorsement of Rangiora as a growth node in the District.
77. The benefits derived from a planned ODP approach include facilitating high levels of connectivity, creating community links to identified focal points. The Site is close to recreation facilities. A coordinated and integrated development will provide a distinctive environmental quality and point of difference to the development.
78. The Site adjoins existing and developing residential development on the western edge of Rangiora.
79. From a community well-being perspective, the provision of additional land for residential growth will continue to support the Council’s investment in community infrastructure by maintaining and facilitating growth rates, increasing the rating base and attracting development contributions.

STATUTORY PLANNING ASSESSMENT
80. Submissions must be assessed under the provisions of the RMA, including Part 2 and Section 32 (Requirements for Preparing Evaluation Reports).

National Policy Statements
National Policy Statement on Urban Development Capacity (NPS-UD)

81. The NPS–UD applies to this proposal as it is directed at Tier 1 urban environments, and Tier 1 local authorities which includes Waimakariri District as part of the Christchurch urban environment that is defined in Table 1 of the NPS, and additionally defined as:

any area of land (regardless of size, and irrespective of local authority or statistical boundaries) that: is, or is intended to be, predominantly urban in character; and is, or is intended to be, part of a housing and labour market of at least 10,000 people.

82. The NPS-UD recognises the national significance of:

a) Having well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future; and

b) Providing sufficient development capacity to meet the different needs of people and communities.

83. The NPS outcomes are to be achieved through objectives that address:

a) Planning decisions improving housing affordability by supporting competitive land and development markets.

b) Regional policy statements and district plans enabling more people to live in areas of urban environments near centres or areas with employment opportunities, area well serviced by public transport or a high demand for housing in the area.

c) Urban environments developing and changing over time in response to diverse and changing needs of people, communities and future generations.

d) Local authority decisions on urban development being integrated with infrastructure planning and are strategic over the medium term and long term.

e) Local authority decisions on urban development are responsive particularly for proposals supplying significant development capacity.

f) New Zealand's urban environments support reductions in greenhouse emissions and are resilient to current and future effects of climate change.

84. The key method to achieve these objectives is by development of a Future Development Strategy (FDS). This will set out how the Councils will provide for sufficient development capacity over the next 30 years to meet expected demand. There is no FDS for the greater Christchurch Urban Area that meets the requirements of the NPS-UD.

85. Work on development capacity completed for the NPS - UDC 2016 by the Greater Christchurch Partnership as an Update of the existing Urban Development Strategy (UDS) – Our Space 2019 confirmed what there was a shortage of feasible development capacity for future housing in Waimakariri District for the medium (next 10 years) and long term (10 to 30 years) periods. That assessment is now out of date as it does not address the requirements of the NPS-UD; and rates of take up of land have exceeded projected rates.

86. One of the key changes in the NPS-UD is that local authority decisions on urban development that affects urban environments are responsive, particularly to proposals that would supply significant additional capacity. It also amends the required methodology for housing and business capacity assessments.

87. The current CRPS does not meet the new NPS-UD requirement in relation to proposals for significant additional capacity. Regional councils are required to include criteria in the RPS to determine what plan changes will be treated for the purposes of Policy 8 as adding significantly to development capacity as soon as practicable. ECAN has yet to respond to this requirement.

88. The NPS-UD has immediate effect, so in the meantime, proposals such as this submission must be assessed in the context of the overall intent and purpose of the NPSUD as articulated in the NPS-UD objectives and policies. This includes that NZ has well-functioning environments; provides sufficient development capacity to meet the different needs of people and communities; planning decisions improve housing affordability to contributing to competitive house and land markets; and RMA plans enable more people to live near major employment areas, where there is existing or planned public transport, and where there is high demand for housing.

89. The NPS-UD is the higher order document and its requirements override those of lower order documents where there is a conflict, including regional and district RMA plans.

90. Key objectives and policies in the NPS-UD are assessed here:

NPS-UD Objective/Policy	**Assessment**
Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	The proposed development will further enable Rangiora to sustain itself as a well-functioning urban environment by consolidating the residential area close to the town centre, and provide residential development close to public transport links and existing community and commercial facilities including Huntingdon Drive local centre. The proposal provides choices in the Rangiora housing market and in doing so

Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.	supports housing affordability. Whilst the proposal is for a premier larger lot urban residential development, it is important that all sectors of the market are catered for. This will be more affordable than forcing those wanting large sections out to the much larger and very limited areas of LLR D1 development, or having to purchase 2-3 sections in a standard residential subdivision. There Site is in multiple ownership and the landowners are working together to achieve the rezoning. It will bring more competition into the market by bringing new entrants into the market.
Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply: the area is in or near a centre zone or other area with many employment opportunities the area is well-serviced by existing or planned public transport there is high demand for housing or for business land in the area, relative to other areas within the urban environment.	The CRPS is due for review in 2024 but in the meantime the existing CRPS is not in accordance with the NPS-UD 2020. The proposed rezoning is on the edge of the District's largest centre, which offers a wide range of community and business services, and employment opportunities. It is expected that a proportion of future residents will commute outside the township, but as the township and associated business areas e.g. at Southbrook, continue to grow, this is expected to become proportionally less. Rangiora is well serviced with public transport, there is scope for future mass transit PP, and there is a high demand for housing at Rangiora. The Site adjoins the new West Rangiora Development Area, to the south. Extensions of public transport to service this growth area will be readily accessible to the Site.
Objective 6: Local authority decisions on urban development that affect urban environments are: integrated with infrastructure planning and funding decisions; and strategic over the medium term and long term; and responsive, particularly in relation to proposals that would supply significant development capacity.	Whilst not currently identified as a future growth area in RMA documents, the Site is well placed at the township edge to be serviced by existing infrastructure. Some upgrades may be required, which will be investigated further with Council prior to the hearing. See Policy 8 below for commentary on proposals which supply significant development capacity
Objective 8: New Zealand's urban environments: support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change	The proposal adjoins the existing built up are of Rangiora, close to public transport links. Its excellent accessibility to Christchurch City, substantially enhanced with the new Northern Motorway extensions, means it is now highly accessible to these nearby major employment areas. Travel distances are relatively short, minimising vehicle miles and the potential for greenhouse gas emissions. There is a cycleway link from into Christchurch City, and regular bus services, including an express route. The Site is inland and not subject to natural hazard risks associated with sea level rise arising from climate change.
Policy 1 – Planning decisions for well-functioning urban environments	Assessed at para 41-50
	The proposed rezoning is anticipated to provide sections that will be available for the short term (up to 3 years) and into the medium term (3-10 years) if adopting a more conservative outlook.

Policy 2 - Sufficient development capacity Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.	The locational and amenity advantages of Rangiora also favour strong ongoing demand. The PWDP UFD-O1 Feasible Development Capacity for residential activities identifies the need for 6300 residential units in the period 2018-2028, and 7100 residential units 2028-2048. These numbers are derived from Chapter 6 CRPS Table 6.1. and are out of date. Data from the Council (November 2021) confirms that there are about 800 vacant lots in Rangiora. Building consents are at about 180/year. That means there is about 4 years vacant land supply. A lead in time of 3-5 years is needed to go from rezone to house build so the Council is facing an unnecessary squeeze on land availability. That will translate in to an upward shift in land and section prices as has been the case at Rolleston. The data suggests that the PWDP will be late to the party to ensure there is at least sufficient development capacity to meet expected demand for housing land over the short term, medium term, and long term. There is a looming, inevitable land supply issue so any proposal to add capacity will push the Council closer to meeting the requirements of the NPS-UD. The proposal is consistent with ensuring there is at least sufficient land supply for housing.
Policy 8 – Responsiveness to plan changes Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is: (a) unanticipated by RMA planning documents; or (b) out-of-sequence with planned land release	The proposed rezoning is not anticipated by RMA documents - it is not a Greenfield Priority or Future Development Area in the CRPS, or a New Development area in the PWDP. A responsive approach to the proposal is required as it meets the Policy 8 criteria for unanticipated zoning. It will contribution to well functioning urban environments and will add significant development capacity. There is no development capacity for the housing typology proposed – so any provision is significant in this context. The development will deliver appx 311 high amenity large lot residential sites at an average density of 1500m2. This will be higher if a mix of densities are proposed, which may be appropriate in some parts of the Site, dependent on master planning work to follow.

91. Adopting the submission to re-zone the land, and enable the proposed development on the submission Site will satisfy the objectives and policies of the NPS-UD.

Proposed National Policy Statement for Highly Productive Land (NPS-HPL)

92. The Government proposed in 2019 a NPS-HPL to prevent the loss of productive land and promote its sustainable management. The overall purpose of the proposed NPS-HPL is to improve the way highly-productive land is managed under the Resource Management Act 1991 (RMA) to:

a) Recognise the full range of values and benefits associated with its use for primary production
b) Maintain its availability for primary production for future generations
c) Protect it from inappropriate subdivision, use, and development.

93. The NPS-HPL is still a proposal and not intended to take effect until after Gazettal. At the date of this submission the NPS-HPL has no effect and no assessment of it is required for the purposes of this submission.

94. The Proposed NPS-HPL interim definition of HPL is land defined as Land Use Capability Class 1-3 soils. A portion of the Site contains Class 2 and 3 soils (see **Figure 10)**. Highly productive use of these soils is not realistic given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production). Its present use as lifestyle blocks, low level grazing and agistment is the more likely long run use of the Site if not rezoned.

95. Objective 3 of the Proposed NPS-HPL specifically refers to highly productive soils being protected by avoiding *"uncoordinated urban expansion on highly productive land that has not been subject to a strategic planning process"*.

The Site was assessed through a strategic planning process (WDDS 2018) and the RRS as a preferred site for LLRZ development, and rejected for a change in zoning on the basis that it may be required for long term urban growth of Rangiora.
96. It is therefore considered that this submission to re-zone the Site is largely in accordance with the Proposed NPS-HPL.

National Planning Standards

97. The National Planning standards prescribe various matters under the RMA so that there is consistency among planning documents most relevantly here in terms of appellations for zones, and the standards applying to these zones.
98. The proposed rezoning adopts the standard zone appellation, in this case LLRZ as contained in the PWDP.
99. The PWDP identifies plan standards for minimum and average net site areas for the respective zones. These are modified for the proposed rezoning as a higher density LLRZ.
100. The higher density LLR zoning is entirely consistent with the NPS purpose for the LLRZ as reproduced below. In this case, the principal constraint to more intensive development is the peri-urban location where a lower density transition to the rural environment is appropriate (particularly noting that the zone boundary is 'mid block' so there is no natural or physical buffer between rural and residential areas); the existing pattern of 4 ha lots with existing substantial homes and gardens; and the fact that the premier large lot subdivision proposed relies on consistency of housing quality and character to be deliver on this vision for the area.

Large lot residential zone

Areas used predominantly for residential activities and buildings such as detached houses on lots larger than those of the Low density residential and General residential zones, and where there are particular landscape characteristics, physical limitations or other constraints to more intensive development.

Low density residential zone

Areas used predominantly for residential activities and buildings consistent with a suburban scale and subdivision pattern, such as one to two storey houses with yards and landscaping, and other compatible activities.[2]

Canterbury Regional Policy Statement 2013 (CRPS)

101. Chapter 6 of the RPS *"provides a resource management framework for the recovery of Greater Christchurch, to enable and support recovery and rebuilding, including restoration and enhancement, for the area through to 2028. Recovery in Greater Christchurch is also supported by the provisions in Chapter 5 notated as 'Entire Region'. The provisions in the remainder of the RPS also apply.3"*
102. An assessment of the proposed rezoning against the relevant CRPS Objectives and Policies is set out in **Appendix 1**. This should be read in the context of the CRPS being overdue for review and that it does not provide a regional response to the NPS-UD. The
need to focus on earthquake recovery has now passed and so many of the directive provisions need to be given appropriate 'weight' in a new national policy environment with a focus on flexible, responsive panning approaches that better provide for people's needs and well-being.
103. That assessment shows that

a) The development proposal achieves the objectives for the location, design and function of new developments (Objective 5.2.1)

b) The traffic effects of the proposal are unlikely to give rise to adverse effects and so achieves CRPS objectives for the strategic land transport network (Policy 5.3.7)

c) The Site falls outside the FDAs shown on Map A of Chapter 6 and in that regard is inconsistent with RPS Policy 6.2.1 clauses 1 to 3.

1. identifies priority areas for urban development within Greater Christchurch;

2. identifies Key Activity Centres which provide a focus for high quality, and, where appropriate, mixed-use development that incorporates the principles of good urban design;

3. avoids urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS

d) The environmental effects assessment outlined above establish that the proposed development is consistent and will not give rise to any concerns with respect to all the matters listed in RPS Policy 6.2.1 clauses 4. to 11. These matters are:

6.2.1 Recovery framework

Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that:

1. As above;

2. As above;

3. As above;

4. protects outstanding natural features and landscapes including those within the Port Hills from inappropriate subdivision, use and development;

5. protects and enhances indigenous biodiversity and public space;
6. maintains or improves the quantity and quality of water in groundwater aquifers and surface waterbodies, and quality of ambient air;
7. maintains the character and amenity of rural areas and settlements;
8. protects people from unacceptable risk from natural hazards and the effects of sea-level rise;
9. integrates strategic and other infrastructure and services with land use development;
10. achieves development that does not adversely affect the efficient operation, use, development, appropriate upgrade, and future planning of strategic infrastructure and freight hubs;
11. optimises use of existing infrastructure; and
12. N/A

e) The proposed rezoning achieves policies relating to:
- Sustainability;
- Integration of transport infrastructure and land use;
- Urban design; and
- Biodiversity, natural hazards, landscape, soils, contaminated land.

104. In terms of the CRPS polices for rural residential developments (Policy 6.3.9) the proposal sits square with all policy matters other than being a location identified in an adopted Rural Residential Strategy; and being at a higher density than provided for under this policy (ie greater than 1-2 hh/ha). As such it has a majority of features entirely consistent with the policy.
105. The CRPS includes housing capacity targets as below

6.2.1a Targets for sufficient, feasible development capacity for housing [inserted in accordance with sections 55(2) and 55(A) of the Resource Management Act 1991, from the National Policy Statement on Urban Development Capacity 2016]
For the period 2018-2048, sufficient, feasible development capacity for housing is enabled in Greater Christchurch in accordance with Table 6.1.
Table 6.1 Targets for housing development capacity in Greater Christchurch, 2018-2048

106. These derive from Our Space, under the requirements of the then NPS-Urban Development Capacity 2016, since replaced by the NPS-UD 2020. The targets (known as bottomlines in the NPS-UD) are to be treated as 'minimums' not 'maximums'.
Policy 6.3.12
enables urban development in the Rangiora and Kaiapoi FDAs (new Development Areas in the PWDP) where needed to meet the medium term targets. This a 'minimum' allocation approach contrary to the NPS-UD. The NPS-UD favours over allocation, including in locations unanticipated by RMA plans, where it will add additional development capacity, can be integrated with infrastructure planning and funding, and will contribute to well functioning urban environments – as is the case the proposed Lehmans LLR D2 zone.
107. The proposed Lehmans LLR D2 zone is consistent with the CRPS except with respect to those parts of the CRPS which are out of step with and do not give effect to the higher order plan, the NPS-UD.

Proposed Waimakariri District Plan
108. An assessment of this proposal against the relevant PWDP Objectives and Policies for urban growth and development as notified on 17 September 2021 is set out in **Appendix 2.**
109. That assessment shows that the proposed rezoning is entirely consistent with the relevant objectives and policies, including as sought to be amended by this submission. Those amendments are to UFD-P3 Identification/location and extension of Large Lot Residential Zone areas; and LLRZ-O1 and LLRZ- P1-5 and reflect the intent and outcomes intended for the proposed LLRZ D2 zone, which is a higher density LLRZ zone than the PWDP LLRZ zone (renamed LLRZ D1 in this submission).

ASSESSMENT AGAINST OTHER PLANNING DOCUMENTS
Our Space 2018-2048 Greater Christchurch Settlement Update (2019)
110. Our Space is a non-statutory document prepared under the Local Government Act. It
"responds to the new Government Policy Statement on Land Transport, which has increased funding for mass public transit schemes, and meets the requirement of the National Policy Statement on Urban Development Capacity (NPS-UDC) 2016 to prepare a
future development strategy…. Specifically, it:
• sets out how targets for housing for the next 30 years will be met, accommodating an additional 150,000 people;
• identifies locations for housing growth, encouraging Central City and suburban centre living while providing for township growth in Rolleston, Rangiora and Kaiapoi;…

• *promotes a compact urban form, which provides for efficient transport and locates development in a manner that takes into account climate change and sea level rise.[4].*

..Underpinning this settlement pattern approach is the vision for a transformation of the transport network that fosters much greater public and active transport usage, and reduced reliance on the private vehicle.

111. Our Space acknowledges that this will require commitment from the Government to invest in the necessary improvements to our transport system, which could include investing in rapid transit services. To date, there has been no successful business case for improved public transportation, including not as a Covid 19 fast track infrastructure project.

112. The Our Space housing capacity targets (Table 3) and Future Development Areas are related to growth of urban areas.

113. Our Space, like the CRPS (and the Operative District Plan) are now out of date, as they do not reflect or give effect to the new requirements of the NPS-UD.

Waimakariri 2048 District Development Strategy (WDDS)

114. The preferred growth directions for Rangiora in the WDDS 2048 (2018) are outlined above (under 'Site') i.e. westwards to Lehmans Road, and otherwise eastwards. However, the Council in its decision on the RRS, recognized west of Lehmmans Road as a potential longer town urban growth area.

115. The WDDS Rangiora Snapshot (pp38-39) -when looking ahead to 2048 proposed that:

a) Rangiora remains the District's largest town
b) 30,000 – estimated population (2048)
c) 12,025 – estimated households
d) 5,025 - new households in Rangiora
e) Continues to accommodate one third of the District's residential growth
f) 167 – estimated annual building consents for new dwellings for the next 30 years
g) 423 hectares of additional feasible residential land required by 2048 (this includes capacity in remaining stages of existing residential developments as well as new greenfield areas inside and outside of the Infrastructure Boundary)
h) Future residential growth directions proposed to the east (predominantly) and west of the current town
i) Opportunities for intensification/regeneration to be identified
j) New growth directions take into account areas of unacceptable natural hazard risk and areas of significant environmental and cultural values
k) New growth areas to connect into existing sewer and water networks
l) Stormwater Levels of Service designed to meet increased performance requirements

116. At the 2018 Census Rangiora had a population of 17,841, and 7314 total dwellings (incl those unoccupied and under construction). Population projections for the District show an average annual change 2018-2020 of 1700 persons. If Rangiora continues to attract a third of all district growth as stated in the WDSS then Rangiora's population in 2021 will be around 18,900.

Mahaanui Iwi Management Plan

117. Part 1 of the PWDP in a section "Mana Whenua" sets out the position with respect to iwi and the review of the district Plan:

a) The District's territorial area sits within the takiwā (territory) of Ngāi Tūāhuriri which is one of eighteen Ngāi Tahu regional papatipu rūnanga, constituted under the ***Te Rūnanga o Ngāi Tahu Act 1996*** *to represent* ***mana whenua*** *interests.*

b) The preparation and change of a district plan must take into account relevant iwi documents. For the District, Ngāi Tahu has set out its resource management values, issues, objectives and policies within the Mahaanui Iwi Management Plan (2013).

c) The Mahaanui Iwi Management Plan identifies objectives, issues and policies for natural resource and environmental management for six pāpatipu rūnanga (including Te Ngāi Tūāhuriri Rūnanga). It seeks to ensure that the taonga and resources of Ngāi

Tahu mana whenua are recognised and protected in the decision-making of statutory agencies. The Mahaanui Iwi Management Plan contains a comprehensive suite of policies and objectives addressing the range of resource management matters of significance to tangata whenua. The District Council shall have regard to the Mahaanui Iwi Management Plan when preparing or changing the District Plan, to the extent its content has a bearing on resource management issues of the District.

118. The Mahaanui Iwi Management Plan (MIMP) 2013 was released on 1 March 2013.

119. The MIMP is a tool for tangata whenua to express their identity as manawhenua and their objectives as kaitiaki, to protect their taonga and resources, and their relationships with these. The MIMP seeks to ensure that these taonga and resources are recognised and protected in the decision-making of agencies with statutory responsibilities to tangata whenua. Importantly it is also a tool

that assists Papatipu Rūnanga representatives to articulate their values, issues and policy into statutory processes.
120. The MIMP includes both general objectives and policies about the management of land, air, and water, and also includes catchment specific objectives and policies.
121. Section 5.3 Wai Maori (pp77-98) contains an extensive discussion about tangata whenua rights and interests in freshwater. It provides a suite of Issues, Objectives and Policies for freshwater
122. Section 5.4 Papatuanuku (pp101-124) sets out the Ngai Tahu Subdivision and Development Guidelines that are to be read along-side objectives relating to:

a) Land use planning and management in the takiwā reflects the principle of Ki Uta Ki Tai. (from the mountains to the sea)

b) Rural and urban land use occurs in a manner that is consistent with land capability, the assimilative capacity of catchments and the limits and availability of water resources.

c) Inappropriate land use practices that have a significant and unacceptable effect on water quality and quantity are discontinued.

d) Ngāi Tahu has a prominent and influential role in urban planning and development.

e) Subdivision and development activities implement low impact, innovative and sustainable solutions to water, stormwater, waste and energy issues.

123. Section 5.5 Tane (pp127-137) includes objectives that focus on:
a) Regional policy, planning and decision making in the takiwā reflects the particular interest of Ngāi Tahu in indigenous biodiversity protection, and the importance of mahinga kai to Ngāi Tahu culture and traditions.
b) The customary right of Ngāi Tahu to engage in mahinga kai activity is recognised, protected and enhanced…
c) Customary use, and therefore mahinga kai, is given effect to as a first order priority for freshwater management in the takiwā.
124. Section 6.4 (pp213-224) addresses issues of particular significance to the lands and waters of the Waimakariri catchment within which the Site lies.
125. Relevant Objectives relating to urban development of land in that catchment include:

a) The natural "energy, vitality and life" of the Waimakariri River as a braided river is protected and restored.

b) The discharge of contaminants to the Waimakariri and its tributaries is eliminated.

c) Water quality and flows in the Waimakariri and its tributaries are improved to enable whānau and the wider community to have places they can go to swim and fish.

d) The mauri and mahinga kai values of the Waimakariri and its tributaries and associated springs, wetlands and lagoons are protected and restored; mō tātou, ā, mō kā uri ā muri ake nei.

126. A key issue relating to subdivision and development is that subdivision and development activities in the lower catchment have the potential to adversely affect Ngāi Tahu values such as waterways, mahinga kai and sites of significance (Issue Wai4).
127. The proposal provides for full urban reticulation of the three waters and is consistent with the objectives and policies contained in Chapters 5.3 and 5.4 of the MIMP. The proposal does not preclude individual land owners from installing rainwater collection and use from roof areas at the time of building development.
128. The proposal has been designed taking into consideration the potential effect of resultant subdivision and development on the rivers and streams that flow into the lowland rivers.
129. Overall it is considered that the proposal will not have adverse impact on the cultural values of iwi as set out within the MIMP.

SECTION 32 ASSESSMENT

130. A Section 32 assessment is contained in **Appendix 3.**
131. In summary, the PWDP zoning and associated rules (RLZ Zone with a minimum lot size for subdivision and a dwelling 4ha) do not meet the needs and aspirations of the current owners.
132. Strategic Council planning documents (specifically the WDDS) have a focus on only meeting urban growth demands within urban environments of existing towns. They favour intensification (15hh/ha) and a strict allocation of capacity by development areas. It is a control and command regime consistent with Map A of Chapter 6 of the CRPS but is out of step with the requirements of the NPS-UD which requires a more flexible, responsive approach, prohibits a hard fixed unmoveable urban/rural boundary.
133. This approach leaves little room for new proposals or proposals that do not sit square with the standard array of GRZ/medium density or SETZ (Settlement Zone). SETZ applies to some of the District's smaller settlements outside Greater Christchurch.
134. Neither LRZ nor Large Lot Residential (LLRZ) as notified in the PWDP is an efficient use of this block of land located as it is immediately adjoining the urban area of Rangiora, and in a location easily accessible to the town centre by active transport modes as well as car and several district reserves.
135. If this Site is not zoned for LLRZ D2 (minimum average lot size 1500m^2) use to enable residential re-development then it will drive pressure to re-zone elsewhere. That step potentially will not have the significant benefits to Rangiora long term in relation to enabling a well-functioning urban environment that enables people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future. Additionally re-zoning to LLRZ D2 will contribute to providing additional development capacity to meet the different needs of people and communities in a planned manner and

consistent with the NPS-UD.
136. The Site can readily be developed to reflect the principles of the Urban Design Protocol with values of character, context, and connectivity.
137. The Section 32 assessment concludes that the proposal to re-zone the Site from LRZ zone to LLRZ D2 Zone (average lot size 1500m$_2$) is the most appropriate method for achieving the objectives of the proposal, than the other alternatives considered.
138. Option 2 identified in the s 32 assessment is consistent with some PWDP policies notwithstanding that it does sit square with the strategic intentions signaled in the WDDS and the PWDP approach to providing for development capacity and urban development.
139. Option 2 identified in the s 32 assessment to re-zone the Site is the most appropriate given:

a) The proposals adopt the PWDP zones, development and activity standards with appropriate amendments. This ensures continuity of the District Plan anticipated environmental outcomes and urban amenity for Rangiora and adjoining residential areas;

b) Will be consistent with and give effect to many of the relevant PWDP objectives and policies;

c) It is a logical extension to the developed and developing residential land adjoining the Site while achieving a compact, efficient urban form that removes pressure on isolated rural land elsewhere around Rangiora.

d) It gives effect to the NPS-UD, specifically Objective 6 c) and Policy 8, delivering significant additional development capacity and contributing to a well functioning urban environment.

e) It is assumed that there will be capacity in the public utilities and the existing road network, including planned upgrades, to accommodate the traffic effects of the redevelopment;

f) The proposed Site specific ODP will provide certainty of the final form and disposition of the re-zoned area including its proposals for reserves, roading, future linkages for pedestrian and vehicular traffic.

140. The re-zoning proposal is considered to be appropriate to achieve the sustainable growth and development of Rangiora.
141. The economic, social and environmental benefits of the proposed rezoning outweigh any potential costs.
142. The overall efficiency and effectiveness of the proposed rezoning (Option 2) is high, in comparison to the alternative options set out in the s 32 Assessment which are low (Options One and Four) or low to moderate (Option Three).
143. The PWDP proposes to release land for development in the new Development Areas at Rangiora and Kaiaipoi through a novel and untested certification process that is not clearly derived from RMA statutory powers, nor Local Government Act 2002 (LGA) authority. This approach is not proposed for the LLR Overlay areas. As the proposed Lehmans Road LLR D2 zone proposed by this submission seeks large lot urban densities, it is anticipated that Council may favour the certification process if it accepts the proposed rezoning. This is opposed – rezoning to LLRZ D2 is sought.
144. Potential difficulties with the proposed certification process are identified and discussed in the Section 32 Assessment. (**Appendix 3)**. In summary, the process is hugely discretionary, does not provide conventional rights to an applicant (eg right of objection/appeal) meaning decisions cannot be challenged, and it is not apparent that the process will be appropriately documented with a transparent record of the decision-making within the certification process. Further uncertainty arises in the practicalities of how to negotiate and manage the staging, funding and building of key infrastructure across a range of Sites, and a risk that land supply is controlled by a limited number of large developers. It is a far less efficient and effective method for delivering land for housing than the Council rezoning the land in the PWDP.
145. The proposed rezoning is considered to be the most appropriate, efficient and effective means of achieving the purpose of the RMA.

CONSULTATION

146. The landowners and their consultants have submitted on the WRRS and the WDDS (**Appendix 4)**.
147. The submissions to re-zone as rural residential or identify the Site as suitable for LLRZ have been rejected as noted above. LLRZ but at higher densities as now proposed is considered to be a more efficient use of the land and better meets market demand. 5000m^2 sites provide more land is needed for a spacious home and garden.
148. The landowners have been consistent in their wish to find a zone and possible land uses better suited to their needs.

CONCLUSION

173 The submission seeks to rezone 58 ha of land adjoining Rangiora from Lifestyle Rural Zone (LRZ) to Large Lot Residential with a specific density standard (LLRZ D1), minimum average lot size 1500m^2.
149. The Site has a long history of rural lifestyle use. It is not significantly restricted by potential natural hazards especially flooding, nor does it have physical limitations for development for residential purposes as it is not liquefaction prone, and has no known geotechnical limitations but does contain an area of LUC 2 soils. It is near a site of significance to iwi (SASM – 025) being the Rakahuri/Ashley River The Site has access to a collector road and is near to a strategic road giving direct access to the town centre and a range of community amenities and facilities.
150. The Site immediately adjoins the urban area of Rangiora, and is well located to join in to Council utility services. It is well suited for conversion to residential use.
151. The Site is not identified within the westward growth direction for Rangiora in the District Development Strategy 2018 nor is

it part of the DEV-WR development area which adopts Lehmans Road as its western boundary. It is in a location that achieves coherent and compact urban form offering ease of access to business services, community facilities, reserves and the primary road network.
152. The proposed rezoning provides for a connected and high amenity residential living environment not presently available under the PWDP while avoiding and/or mitigating any potential adverse effects on the environment. It will provide for continuing high demand for a variety of high quality residential sections aimed at a particular segment of the housing market in an ideal location, easily accessible to the existing town centre services and facilities. It will broaden the range of housing available. As such, it is consistent with the NPS-UD including Objective 6c) and Policy 8, to be responsive to proposals which supply significant development capacity and contribute to a well functioning urban environment.
153. The use of this Site for residential purposes can be a sustainable and efficient use of land and infrastructure. The proposed rezoning better provides for the social, economic, environmental well-being of the landowners and the Rangiora community than continuation of the current low intensity lifestyle land use on 4ha blocks, or a conventional LLRZ residential use.
154. Any potential adverse effects of the implementation of the proposed rezoning can be assessed at subdivision stage but there has been no restriction on servicing the blocks to date. Capacity will need to be confirmed for infrastructure, power and road network. Any future subdivision of the Site will need to confirm water supply and wastewater treatment and disposal options.
155. Rezoning of the site to LLRZ zone is not inconsistent with the policies and objectives of the PWDP, but it is at odds with the dated CRPS approach to provision of urban growth and housing capacity for Greater Christchurch, to the extent that it is not within an FDA created by Change 1 to the CRPS and is not identified as an LLRZ site under the strategic RRS prepared by the Council.
156. As the proposal helps achieve the purpose of the RMA, and has been shown to be consistent with the relevant provisions of the NPS-UD, the submission can be accepted by Waimakariri District Council.

Original Submission

Summary Reasons for the Submission

The reasons for our submission are outlined below.
a) The preferred relief (**the proposed rezoning**) is both appropriate and necessary to achieve sustainable growth and development of Rangiora and the District and meet the requirements of the National Policy Statement for Urban Development 2020 (**NPS-UD**).
b) The Site identified in Figure 1 and at para 1 of the Preferred Relief above is a logical and preferred location that lends itself to a specific type of housing development not provided within the PWDP as a residential option adjoining but outside the existing urban areas. Nowhere is it possible to develop in a comprehensive, coordinated way a low density, high quality residential environment in the District's towns, the Rural Lifestyle Zone or Settlement Zone as a permitted activity.
c) The requirement for 12/15 hh/ha in GRZ zones (the majority of land in urban areas) drives development to modern scale relatively small urban lots best produced as a package across a significant land holding. The GRZ subdivision standards do not provide for the needs of people who seek a generous sized urban lot residential setting. This is a housing sector that is running against the planning tide of intensification but is, nonetheless, a legitimate form of housing in an appropriate setting. The barriers to such development in urban areas requires an appropriate setting/ location in the rural areas but close to or adjoining the urban areas and at a much lower density than is desired or appropriate (the PWDP LLRZ) to meet the housing needs for generous sized urban lot residential living..
d) The PWDP subdivision standards for LLRZ require lots that are very large for those whose primary interest in a rural setting is a form of residential living, not one that requires significant maintenance and management often involving animals or machinery at scale. Conversely, the GRZ subdivision standards do not provide for the needs of people who seek a large lot residential setting
e) The focus in the PWDP is on prescribing a limited range of residential options and tightly controlling and constraining housing choice within those options. Further urban growth is also tightly constrained and controlled around DEV areas around Rangiora and Kaiapoi but for a very specific form of residential development driven off density requirements that do not match the needs of all landowners.
f) The focus in most new District Plans, driven in part by the National Planning standards, is to simplify the range of zones, to standardize lot sizes, to supposedly create efficiency and certainty through ease of administration of the District Plans. This is done by constraining housing and land development choices by lot size, by location, by built standards and the disposition of built/open elements in a site. However, the National Planning standards do provide for large lot urban residential living, a residential living option which has not been taken up the PWDP (due most likely to the restrictive provisions of the CRPS which only prescribe one from of lower density residential living, at a density of 1-2 hh/ha).
g) This planning approach may be a standard approach to resource allocation but it does not provide a flexible, responsive

approach to innovative and new development options. The Government is creating policy settings that on one hand seek intensification in urban areas, while at the same time pushing away from a land allocation model of planning. The PWDP in striving to face both policy directions has a package of measures that are in fact a major barrier in terms or cost, timeframes and certainties for proposals that are not cut from the suite of housing and development options set out by the PWDP. The allocation of land in preferred development areas, it must be said, runs counter to the Government's push, and now its direction, to free up land for development, to encourage innovation in housing (presently with a focus of intensification) and to make available a range of responses to the need to meet the housing needs of people and communities set out in the NPS-UD.

h) While the weight of demand (and the planning response) is around affordable housing, around small lots and dense development that supports investment in public facilities and amenities such as public and active transport, reserves, and commercial services, there is always a wide spectrum of preferences at play in the housing market. The demand for high quality, generous houses set on generous sized parcels of land within high amenity settings is an important and no less relevant housing sector. There is a strong unmet demand, as confirmed by advice from Bayleys real estate (**Appendix 5**) for larger family homes with room for a pool or similar. Purchasers want to be close the amenities of Rangiora and within walking and cycling distance of local schools. They do not want the only available options – a 4 ha lifestyle block or 5000m^2 rural residential site at Mandeville or Ohoka.

i) Interestingly enough for a nation built on the so-called quarter acre paradise, recent policy and planning interest in housing and land development has now seemingly positioned the 1011m^2 section as a luxury item, as the antithesis of providing for community well-being and needs. It is as though the old quarter acre of itself acts against building a sense of community despite being able to be developed in a planned, structured, coordinated or integrated manner. Rather than being a frivolous discretionary item in land development
and housing choice, a well-planned, well located and properly serviced low density residential environment has much to offer urban environments. They can be tactically used to provide shape and edge to urban areas, they can provide a mass of amenity different from (and potentially complementary to), but no less legitimate in urban outcome terms, to conventional GRZ zoned land.

j) In many ways the approach of a district plan to the role and place of the old quarter acre is not dissimilar to the issues faced by comprehensive retirement villages when first proposed. The idea of dense, almost gated and self-contained communities, with multi storey buildings also did not sit well in many district plans. But now they are accepted as an important part of the urban fabric catering to a specific demographic and health demographic. Most plans enable them.

k) Provision for low density residential in an urban setting, or failing that likelihood, in an adjoining rural zone is a fundamental gap in the district plan.

l) The submission seeks to provide for another housing typology not provided in the PWDP and in a location with significant planning merit. The planning case was made out in a detailed submission to the proposed Rural Residential Strategy (**RRS**) for the land identified in this submission to be "reserved" for conventional Rural Residential zoning in the review of the District Plan. That submission was rejected in favour of a decision ascribing an unspecific strategic significance to Lehmans Road as the urban boundary; simply the decision was that rural residential development here would preclude this area as a future urban growth path, even though this was likely to be very long term as the Waimakariri District Development Strategy (WDDS 2018) for the period up to 2048, does not favour urban growth west of Lehmans Road.

Officer Recommendation

Continue to exclude the area west of Lehmans Road and the racecourse land at Rangiora as growth areas as these were originally considered but not included in the draft RRDS as they trigger the key preliminary criteria of: being on the direct edges of a main town outside of the Projected Infrastructure Boundary (PIB) thereby foreclosing more intensive long-term urban development, and…

Panel Recommendation

The panel accepted the officer recommendations to exclude areas on the fringes of Rangiora in the final RRDS due to these having the potential to foreclose more intensive long-term urban development of the town.

m) In light of the above decision on the Waimakariri Rural Residential Strategy, the proposal now is for a form of high amenity low density urban zoning, which whilst in demand is entirely absent from the PWDP. This will be a long term urban form of development. The proposal set out in the submission will achieve a compact, and efficient, urban form on the edge of Rangiora with excellent connectivity by multiple transport modes. It provides for continuous urban development by enabling a built form which can act as a strong zone or urban boundary.

n) The proposed rezoning will accommodate approximately 311 LLRZ lots1 at the proposed amended density standards for LLRZ D2 (average size 1500m^2). It will contribute to a well-functioning urban environment, meeting the NPS-UD Objective 6(c).

o) Any adverse effects on the environment arising from the proposed rezoning will be minimal, if any, and can be adequately mitigated. A high amenity master planned development is proposed.

p) Significant positive effects arise from the proposed rezoning. It will enable the short term housing demand at Rangiora to be met, and can deliver a housing typology for which there is demand, on lots that are not a burden to the landowners (which is the case for 4ha and the very limited areas of LLRZ D1 with a density of 1-2 hh/ha) and for which there is no provision in the PWDP. At present rates of land uptake there is about 4 years vacant land supply in Rangiora. Given it takes 3-5 years to bring land from zoned state to on the market as developed lots, there is some urgency in providing additional capacity. This proposal helps address an anticipated shortfall in residential zoned plan enabled land.
q) There is no additional cost to the Council in re-zoning the Site as there is expected to be capacity in the public utilities and the existing road network, including planned upgrades.
r) Amendments to PWDP objectives and policies may be necessary to provide for a higher density LLRZ, but of themselves will not act against those relating to Strategic Directions Urban Form and Development and Urban Growth. The PWDP approach to zones and
identification of future development land is already out of step with higher order Resource Management Act 1991 (RMA) statutory documents because they do not give effect to the NPS-UD (and are sought to be amended through this submission).
s) The alternatives of retaining Rural Lifestyle or Large Lot Residential zone across the entire Site are not an efficient use of land which immediately adjoins the urban area of Rangiora, and is highly accessible to the town centre by active transport modes as well as car.
t) The proposed rezoning is consistent with and the most appropriate, efficient and effective means of achieving the purpose of the RMA.

The Site
1. The Site is a 58ha block of land ('the Site') accessed from Lehman Road, Rangiora **(Figure 1)**. It is owned by the two submitters and 12 other landowners.

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1 Assumes 20% of land area taken for servicing including roading, reserves and stormwater management if required.

Figure 1: The site (outlined in blue (Google Earth)

2. The Site is surrounded by RLZ land that is used for a mix of lifestyle and conventional farming. To the NE is the Rangiora Eco Holiday Park, and beyond the Park is the Rangiora Racecourse about 300m away from the nearest lot and 1km from the centre of the Site. Land to the south east is GRZ and part of urban Rangiora with newly developing residential land west of West Belt. About 1.9 km to the NW is Rangiora Airfield. About 1km north of the most northern lot is the Ashley River.
3. The southern-most lot in the proposal with the Rangiora Vet Clinic faces, but does not have access to Rangiora-Oxford Road (State Highway 72). This arterial road provides the main road connection in to the centre of the town. The well-established Fernside Rural residential area is about 2.5km west from the junction of Lehmans and Rangiora-Oxford Roads.

Figure 2: the site is a broader context (Site marked red)

4. The Site is not identified as lying within a preferred growth direction for Rangiora in the Waimakariri 2048 District Development Strategy (2018) (**WDDS**) **(Figure 3)**. No land west of Lehmans Road is included in the West Rangiora Development Area (**DEV-WR**) in the PWDP.

Figure 3: Figure 11 WDDS

5. The Council reviewed its strategic approach to the location and provision of Rural Residential land (now zoned LLRZ in the PWDP) in the WDSS. It adopted the position that it would:

a) Explore tools such as cluster development to manage rural character

b) For rural residential development, adopt an approach that has a primary focus on creating new rural residential areas, with a secondary focus on enabling large lot intensification within existing rural residential areas where there is sufficient community support and servicing available

c) Review the Rural Residential Development Plan for the whole District (pg 21 WDDS).

6. Rangiora presently has a population of 17,841 (2018 Census). It grew steadily between 2006 and 2018. Growth of Rangiora since then has continued in step with the district growth which has increased 8.2% between 2018 and 2021 from 61,300 to 66,300 at an annual average of 2.8% from 2018 to 2020 (Statistics NZ Subnational population projections at 30 June 2021: provisional).

2006 (count)	2013 (count)	2018 (count)
12,165	15,069	17,841

Statistics NZ

Population projections at 30 June

PLANNING STATUS OF THE SITE

Chapter 6 of the Canterbury Regional Policy Statement

7. An assessment of the CRPS is set out in **Appendix 1** to this submission.
8. The Site is within the Greater Christchurch area.
9. It was not shown as a Greenfield Priority Area – Residential (GPA) on Map A of the Canterbury Regional Policy Statement (CRPS). The GPA terminates at Lehmans Road.
10. As a result of the Minister for the Environment's decision of 28 May 2021 on Change 1 to Chapter 6, an area largely south of Oxford Road and a finger of land to the north of Oxford Road was included as a Future Development Area (**FDA**) (**Figure 4** orange).

Figure 4: Map A Chapter 6 Regional Policy Statement Greenfield Priority areas
Site location identified with red circle (appx)

11. The FDAs are intended to accommodate the increased demand for new dwellings in that part of Waimakariri District within the Greater Christchurch Urban Area and to respond to the NPS-UD. They do not provide "plan enabled" land as they need to negotiate a rezoning process to confirm their status as land developable for housing and other urban purposes.
12. The proposal for a LLRZ zone with average lot sizes of 1500m2 is inconsistent with the policy approach of Chapter 6 for Greater Christchurch, in that if fits none of the residential living typologies provided for in Chapter 6 and is not in a location identified for urban or rural residential development. It sits 'between' the urban and rural residential densities provided for in the CRPS (minimum 10 hh/ha for urban in Waimakariri, and average 1-2 hh/ha for rural residential). The proposed density is appx. 6.66 hh/ha.
13. Notwithstanding, the proposal meets all the location and other criteria in CRPS Policy 6.3.9 for rural residential development. It is:

- Outside the CIAL noise contours
- Has some sites with restrictions from the take-off and landing vectors for Rangiora Airfield but not such as to impact its operational capacity.
- Is outside the groundwater protection zone
- Is not within the Waimakariri stop bank system
- Has no views of or to the Port Hills
- Has good access for emergency services
- Will not create reverse sensitivity issues with adjoining land uses; Rangiora Racecourse is 500m away.
- Free of significant natural hazards and is a flat site.
- Supports no significant natural values or ecological values.

• Contains no SASMs.
• Can be integrated into or consolidated with the existing urban area of west Rangiora.
• Contains no surface water bodies so there will be no adverse impacts on these.
• The development will be contingent on an ODP to provide integrated design for subdivision and land use, and provide for the long-term maintenance of a high quality high density rural residential character.
• The proposal is not intended as a staged development towards full urban; rather it is intended to provide a unique residential environment that can stand alone and contribute to the urban fabric of Rangiora like Palmview in east Rangiora, or as Kaiapoi Lakes does for Kaiapoi.

14. Overall, the proposal is not consistent with Chapter 6 but that is more a function of its original purpose when formulated in 2013. Notwithstanding that, the submission for a lower density residential focussed, high quality urban environment that attaches to an existing urban area and that promotes a coordinated pattern of development has planning merit.

Operative Waimakariri District Plan

15. The Site is zoned Rural in the Operative Plan. The minimum lot size for subdivision and a dwelling is 4 ha.

Proposed Waimakariri District Plan

16. The Site is zoned Rural Lifestyle Zone **(LRZ) (Figure 4).** The minimum lot size for subdivision and a dwelling in the LRZ is 4 ha.
17. Oxford Road is a strategic road and Lehmans Road is a collector road.

Figure 5: Proposed District Plan Zoning (site outlined in red)

18. The Site is also subject to, or potentially influenced by, a number of Overlays:
a) Rangiora Airfield Take Off Climb and Approach Obstacle Limitation Surface (**Figure 6**)
b) National Grid Transmission Lines (**Figure 6**)
c) Liquefaction: Liquefaction damage is unlikely (**Figure 6**)
d) Non-Urban Flood Assessment Area (**Figure 7**)
e) Geographic areas: Ecological Area – Plains
f) Ecological District – Low Plains

Figure 6: Rangiora Airfield Take-off and Approach vectors (blue dashed lines); Liquefaction damage unlikely (green)Transmission lines (green lines); Site outlined in red

Figure 7: Non-urban flood assessment & Waimakariri Flood Hazard maps
Blue – medium risk, green – low risk, white – very low

DEVELOPMENT PROPOSAL AND PROPOSED REZONING

19. Subdivision of the Site will create approximately 311 LLRZ D2 lots.
20. The key design drivers for the proposal are:
a) A high amenity premier residential zone with large houses on large sites – average 1500m^2, min 1000m$_2$ based on the St Kilda, Hamilton development concept (**Figure 8**).
b) LLRZ D2 standards would enable a lower density zone in the medium term e.g. 10 years to achieve a high quality consistent character subdivision. If developed as an integrated development subject to an ODP subdivision can be staged for to the proposal.
c) Creating strong connections with the immediate neighbourhood by providing a cohesive interconnected roading layout that picks up direct links to the eastern neighbourhood off Lehmans Road and the northern subdivision roading, and carries them into the Site.
d) Creating a high amenity and diverse residential neighbourhood by providing interfaces to roads, reserves and rural environments.
e) Respecting and building on local identity and character of Rangiora by retaining specific vegetation features from the Site, and anchoring the development into the wider landscape.

21. A development concept can provide for sound urban design by:
a) A hierarchy of movement corridors.
b) Prioritisation of walking and cycling.
c) A north-south alignment of street blocks to maximize solar access and provide for efficient use of lots.

d) Block perimeters being kept as small as practicable to aid permeability and higher public amenity.
e) Enabling a range of housing typologies set in high quality landscape and street setting with generous amenity plantings and curtilage.

Figure 8: St Kilda development images (Bayleys)

22. St Kilda, Cambridge is a premier development on the outskirts of Cambridge, centrally located and with easy access to the Waikato Expressway. It was originally part of a small dairy operation which was dissected by the Waikato Expressway, leaving a portion within the Cambridge Town boundary and the larger balance of the property of approximately 80 ha (which became St Kilda) on the Eastern side of the Expressway, left in the Rural Zone.
23. The initial development concepts were for a Rural Residential type development given the Expressway separation of the existing residential development on the Western side of the Cambridge Bypass, however this was not supported by Council and a new concept of larger residential sections of a 1600m² average size was developed and approved – see https://www.stkilda.nz/page/location/

EFFECTS ON THE ENVIRONMENT

Township growth and urban form

24. The Site immediately adjoins the western edge of urban Rangiora.
25. The WDDS indicated a general preference for the direction of urban growth of Rangiora to the east as a way of balancing up the residential areas around the town centre and some growth to the west.
26. The approach of the WDDS was to signal growth options to be confirmed in the District Plan Review:
The broad directions for greenfield residential growth for the District's main towns are set out in Figures 11 to 14. Further work will be carried out to identify and confirm the exact locations and extent of these residential growth areas, together with the intensification opportunities within existing urban areas. These will be enabled through the District Plan Review and other planning tools.
27. The Strategic Planning documents clearly signal active consideration of growth needs and growth directions. The options available to the Council were constrained by the approach of the CRPS as the District Plan has to give effect to the CRPS and cannot be
inconsistent with it. The CRPS took effect in 2013 and is overdue for review.
28. The CRPS tightly holds urban growth to the constraints of Map A Chapter 6 and the identified FDAs which although amended by Plan Change 1 in 2020 does not respond to the directions of the NPS-UD. In any event the approach is focused on the need for housing in full urban residential land, less on other residential development forms.
29. As such the Site falls outside the planning policy framework for urban growth. However, in terms of urban form and on the ground, there is considerable merit and logic to conversion of this existing LRZ land to a new high amenity residential form that can be integrated into the Rangiora urban fabric.
30. The proposal has the potential to anticipate the longer term growth path confirmed by the decisions on the RRS to protect the future growth option of more intensive urban development in this direction. It can set a pathway to further westward expansion on land
that holds few if any physical barriers to land development.
31. The proposal will contribute to the housing needs of Rangiora and in a form and location that does not undermine the long run urban form of Rangiora. Planned growth confirmed in the PWDP is already intended to extend westwards out to Lehmans Road and to keep the town edge squared up providing depth to future development and providing a rational basis for providing movement networks driven off the key roads such as Rangiora-Oxford Roads. The West Rangiora Future Development Area confirms this approach. The Site sits in the next block west of Lehmans Road so is not proposing a disjointed urban form, nor one that is not part of the long term thinking of urban form and growth for Rangiora.

32. A full residential zoning is proposed under LLRZ D2 and will provide a high quality street character, overall amenity and passive surveillance over the street, and will create the correct lighting standards, roading standard, fully formed footpaths and cycleways required for a high quality urban environment.

Neighbourhood and wider community effects

33. The Site is serviced by a collector road and is close to an arterial road. This provides for ease of access and safe and convenient movement to and from the Site. A planned development co-ordinated by an ODP can facilitate within the site

movement corridors and linkages through the Site to provide for walking and cycling.
34. A key positive neighbourhood and community effect will arise from the existing dwellings and their established gardens and plantings that will anchor new development and provide a point of reference for new dwellings. Development will not be on a bare site; it will take place in an existing established part-residential setting. The transition to a low density, high quality premier residential development will start from a favourable position and minimise the apparent extent and nature of the landscape change.
35. The Site is comparatively large (58.4 ha) and has the potential to support a variety of residential building typologies and this will contribute to a mix of households within the development and provide built form variety and interest in the streetscape. Whilst LLR D2 standards are proposed, it may be that part of the Site is suitable for other higher density forms of development, which would be within scope of the alternative relief, and could be considered as part of the master planning process required for preparation of an ODP (ahead of the hearing). The earlier stages of the St Kilda development were for large lot residential, with more clusters of townhouses included as later stages (and a retirement village). A retirement village is unlikely in this case, given the proximity of the Charles Upham Retirement Village.
36. Rangiora is well-positioned to accommodate and service the needs of a fast-growing resident population that will in turn support more business activity, schools, community facilities and community organisations.

Effects on tangata whenua values
37. The Proposed District Plan does not identify any Sites and Areas of Significance to Maori in the Site, but the nearby Rakahuri/Ashely River identified as SASM-025. This has been scheduled as being
River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species
38. The PWDP has Policy SASM-P8 which is relevant to pre-development processes:
Engagement with rūnanga
Te Ngāi Tūāhuriri Rūnanga and the District Council to encourage engagement with the Rūnanga priorto persons undertaking activities and/or applying for resource consent where the activity has thepotential to adversely affect identified sites or areas of Ngāi Tūāhuriri cultural significance. Where priorengagement with Te Ngāi Tūāhuriri Rūnanga h as not been undertaken by an applicant for an activitythat has the potential to adversely affect an identified site, the District Council will consult with the Rūnanga.
39. The Site is not listed as an archaeological site on the NZ Archaeological Site database.

Landscape and visual effects
40. Rural Lifestyle style development exists on the Site now (a series of 4 ha lots with a dwelling and associated accessory buildings on each). The landscape is dominated by shelter belts, utility buildings, significant trees and planted curtilages around dwellings many of which are well set back off the roads down RoWs.
41. An ODP will help to achieve an integrated, cohesive and coherent development The proposal will lead to a modification of the landscape of the Site from a predominantly lifestyle block landscape to a denser semi-urban environment dominated by residential building that will, in time, get the benefit of street tree and reserve plantings and landscape treatments around the houses.
42. The visual effects which will arise from a change in the number of vegetative and built elements in the landscape are significant, but not avoidable, if the Site is to contribute to the on-going growth of Rangiora. The change will contribute to a high quality amenity and quality of environment and one that will be entirely consistent with and supportive of the rural lifestyle residential development that has successfully established on the Site.

Well-functioning urban environments
43. The Site adjoins the existing built up urban area of Rangiora. Immediately to the east are existing or developing residential areas.
44. The conversion of the Site from present rural lifestyle uses to low density, high quality residential will continue a pattern of outward expansion of Rangiora. Such a change may not be consistent with the PWDP's identification of a Future Development Overlay for west Rangiora only as far west as Lehmans Road, but on the ground it will look and integrate as part of the urban fabric.
45. It will provide some replacement lower density living areas for the existing LLR zones at north west Rangiora – but at much more appropriate higher density that the LLR D1 standard which is 1-2 hh/ha. There are two such areas, shown on the planning maps below. River Road has an 'urban overlay' and is intended to be intensified to urban densities. The land on the opposite (east) side of Lehmans Road is a 'legacy' rural residential zoning which applies under the Operative District Plan. The landowners have developed the adjoining residential subdivision and wish to develop the land for full urban residential development. Services are in place to support this. The constraint to date has been Map A of the CRPS which does not include the land as a Greenfield Priority Area or Future Development Area, GR zoning of this land is consistent with the NPS-UD.

Figure 9: PWDP as notified – LLRZs shown in light grey. Diagonal stripes – urban growth overlay.
Site outlined in red.

46. Rangiora is growing apace. It is attracting significant interest from new home buyers as people respond to the significant investment in upgraded transport links (Northern Corridor and public transport) and a growing economic base for employment within the District and the City.

47. Rangiora has excellent connectivity to the City, both via the new Northern Corridor, and a nascent cycleway link into the City. There is a very regular bus service every half hour.(the No 1 Blue Line) The standard trip takes 70 minutes, and there is a twice daily weekday morning express service from Rangiora, and seven times weekday express out to Rangiora all via Kaiapoi.

48. The Site will step out the western edge of Rangiora, but as it exists in a peri-urban form now, such a change does not alter how the Site interacts with Rangiora as a whole. It is in many ways a functional part of urban Rangiora now; it's only the Zone boundaries and policy framework that create the sense of it not being part of Rangiora.

49. The Site is convenient to the Rakihura/ Ashley recreation trails, the racecourse, Arlington Park, and the airfield. The town centre is easily accessible.

50. The following assessment of the criteria in the NPS-UD for determining a well-functioning urban environment shows that the proposed rezoning will deliver urban, housing and residential outcomes that meet those criteria. There will be a variety of homes enabled by generous lot sizes. The Site is well-positioned, building as it does on an existing township well-serviced by public transport and cycling options, to provide good accessibility to jobs, community services, and open spaces, as well as mitigating climate change impacts and future natural hazards by being not near the coast and well removed from major rivers.

NPS-UD Policy 1

Planning decisions contribute to well functioning urban environments, which are urban environments that, as a minimum:	**Assessment**
(a) have or enable a variety of homes that: (i) meet the needs, in terms of type, price, and location, of different households; and (ii) enable Māori to express their cultural traditions and norms;	The proposal is to have larger lots supporting predominantly standalone dwellings and associated accessory buildings (including generous sized garaging) in an open landscaped garden setting. This will fill a gap in the range of housing typologies available at Rangiora and contribute to a better functioning urban environment overall at Rangiora. It is not necessary for each individual rezoning proposal to have a wide range of housing typologies, and in some circumstances this may not be appropriate. The rezoning will deliver a premier high amenity urban subdivision with generous sized lots which will complement existing and planned higher density residential development at west Rangiora. There is scope with the relief sought for a mix of residential densities. The appropriateness of this can be considered at the master planning/ODP stage. The Site has the potential to create a unique urban environment in Rangiora. It can follow the example of Palmview based on a lake or Kaiapoi Likes providing a niche housing option in Rangiora and the District meeting a need for residential land not constrained to GRZ standards.
(b) N/A business sectors	
(c) have good accessibility for all people between housing, jobs, community services,	The Site has access to a collector road and a strategic road providing easy access to key community amenities and facilities. The town is served by a public bus route to the city, and a cycle trail connecting to Kaiapoi and the City. The new West Rangiora Development Area adjoins the Site to the south. The Site will become closer to Rangiora public transport routes as they extend out to service this new growth area over time.

natural spaces, and open spaces, including by way of public or active transport; and	The Site is in walking distance to Arlington Park and the Rakahuri/Ashley which contains abundant recreations pace. It is easily accessible to the town centre and within walking distance to the Huntingdon Drive local centre.
(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and	The demand for housing and land in Rangiora is largely ahead of the planning means to respond. This proposal will "top up" the land presently set aside in the PWDP and provide a useful buffer to demand. The Site owners have been keen to release this land for more intense development for some time; there is no prospect of land banking.
(e) support reductions in greenhouse gas emissions; and	The Site has significant advantages in being easily accessible to the town centre and reserves, community facilities and schools. The proposal retains a consolidated form to Rangiora with good connectivity and linkages to recreation space and commercial centres reducing the need for car travel.
(f) are resilient to the likely current and future effects of climate change	The Site is within the area of influence of a major river but the non-urban flood assessment maps do not show extensive flooding likely at the Site. Being inland it is not at risk from climate change induced extreme natural hazard events like sea level rise. or river flooding.

Effects on ecosystems and habitats

51. The Site is currently used for a mix of low intensity (grazing) farming, and lifestyle purposes. Shelter belts and utility buildings have been established
52. The Site has been identified in the PWDP with two ecological overlays (the PWDP ecological overlay – Plains and Low Plains Ecological District). They are a district-wide overlays and no specific ecological values have been identified in the Proposed Waimakariri District Plan. These overlays seek primarily to retain indigenous vegetation. The PWDP identifies SASM 025 nearby the Site. That is a Site and Area of Significance to Maori and in SASM - Schedule 1 is identified as *being River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species.*

Effects on natural and physical resources

53. The Site drains in a SE direction towards the newly developing residential area.
54. There will be a degree of site disturbance as part of creating the roading network, and reserves, and as part of curtilage development on each lot.
55. The proposed use for residential activity inevitably leads to loss of some rural productive potential as land owner intentions are not about farming or productive use of the land, but lifestyle use and enjoyment. Built forms and hard surfaces become more dominant.
56. The Site comprises 4ha bocks now and these are not able to be used effectively for productive purposes other than for intensive productions based on tunnel housing and other supported production systems. None exist in the Site now.
57. The Site contains Class 2 and Class 3 soils as defined in the NZ Land Use Inventory (Landcare Research) Land Use Capability classes 1-3 **(Figure 10)**. Productive use of these soils other than for low level purposes i.e. grazing, is not feasible given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production).

Figure 10: Site soils: Site outlined in red; (Canterbury Maps)
Class 2 soils: bright green/Class 3 soils: light green;

Discharges of contaminants into the environment
58. There will be no discharges of contaminants into the environment. Wastewater will discharge to the Council's reticulated system.
59. Stormwater discharges will potentially be to ground given ground conditions or to an approved and consented stormwater management and treatment area which will meet all relevant Council standards.

Risks from natural hazards or hazardous installations
60. The PWDP planning maps show the Site as being within a Non-Urban Flood Assessment Area.
61. The District Plan maps do not identify high flood hazard areas or high coastal flood hazard areas, rather these are identified through the flood assessment certification process. This enables the most up-to-date technical information to be used. However, as a guide, areas that are potentially high hazard can be identified through the Waimakariri District Natural Hazards Interactive Viewer (NH - Introduction).
62. Rules that refer to a Flood Assessment Certificate require a certificate to be obtained from the District Council to determine compliance with the relevant rule. The alternative is to apply for resource consent as set out in the rule.

63. Rule NH-R2 states
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;

64. Assessment of flood risk and consequence can be undertaken at subdivision stage.
65. There will be no hazardous installations proposed on the Site.

Geotechnical assessment
66. The PWDP planning maps show the Site as being "Liquefaction damage is unlikely. Standard investigation procedure outlined in NZS3604 is appropriate".

Contaminated land
67. A Preliminary Site Investigation can be carried out for the Site at subdivision stage.
68. An enquiry of ECAN has identified that two sites at the northern end of the Site potentially contain some contaminated land, which can be investigated further at subdivision stage **(Appendix 6)**. 315 Lehmans Road is an unverified HAIL site (previous use for clay target shooting) and 317 is registered as containing uninvestigated persistent pesticide bulk storage.

Servicing
69. Proposals for servicing the Site and the effects from such servicing in relation to domestic water supply, wastewater, stormwater, roading, and telecommunications will be required for any subdivision consent.

Economic effects
70. It is anticipated that urban development will generate positive economic effects, both from the investigation/development phase and for the longer run economic activity from householders participating in the local economy.

Climate Change effects
71. An assessment of the effects of the proposed rezoning on climate change is included as part of the assessment of a well-functioning urban environment above.
72. A well-functioning urban area that is designed and serviced in an integrated manner, applying sound urban design principles, will enable a reduction in greenhouse gas emissions compared to unplanned, ad hoc development that does not create compact urban forms located where the services and benefits of existing, established urban areas are not readily accessible.
73. There is a triangle of planning influence that can be brought to bear on reducing greenhouse gas emissions
a) Compact urban form minimising distances between homes and work/play options.
b) Proximity of homes to community facilities, services and amenities and business/work areas.
c) Design and provision of movement corridors and linkages that create opportunities other than for vehicles for getting

around.
74. The Site of the proposed rezoning:
a) Helps in retaining a compact urban form to Rangiora.
b) Is easily accessible to the town centre and is located convenient to the recreation resources of the nearby Rakahuri/Ashley River, the airfield and racecourse and Arlington Park.
75. Rangiora has excellent connectivity to the City, both via the Northern Motorway, the new Northern Corridor, a cycle way link to Kaiapoi which is linked to the new north city cycle way along the Northern Corridor and a very regular bus service.

Positive effects
76. The proposed rezoning will provide for the continued growth of Rangiora by managing the development through an ODP. The proposal will provide a buffer to on-going high level demand for lots in Rangiora. It will cater for a specific housing need not found in GRZ Zoned land nor LLRZ land. The proposed rezoning is anticipating a form of development that is a much more efficient use of a qualifying site supporting a well-functioning urban area. It is a positive endorsement of Rangiora as a growth node in the District.
77. The benefits derived from a planned ODP approach include facilitating high levels of connectivity, creating community links to identified focal points. The Site is close to recreation facilities. A coordinated and integrated development will provide a distinctive environmental quality and point of difference to the development.
78. The Site adjoins existing and developing residential development on the western edge of Rangiora.
79. From a community well-being perspective, the provision of additional land for residential growth will continue to support the Council's investment in community infrastructure by maintaining and facilitating growth rates, increasing the rating base and attracting development contributions.

STATUTORY PLANNING ASSESSMENT
80. Submissions must be assessed under the provisions of the RMA, including Part 2 and Section 32 (Requirements for Preparing Evaluation Reports).

National Policy Statements
National Policy Statement on Urban Development Capacity (NPS-UD)

81. The NPS–UD applies to this proposal as it is directed at Tier 1 urban environments, and
Tier 1 local authorities which includes Waimakariri District as part of the Christchurch urban environment that is defined in Table 1 of the NPS, and additionally defined as:
any area of land (regardless of size, and irrespective of local authority or statistical boundaries)
that: is, or is intended to be, predominantly urban in character; and is, or is intended to be, part of
a housing and labour market of at least 10,000 people.
82. The NPS-UD recognises the national significance of:
a) Having well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future; and
b) Providing sufficient development capacity to meet the different needs of people and communities.
83. The NPS outcomes are to be achieved through objectives that address:
a) Planning decisions improving housing affordability by supporting competitive land and development markets.
b) Regional policy statements and district plans enabling more people to live in areas of urban environments near centres or areas with employment opportunities, area well serviced by public transport or a high demand for housing in the area.
c) Urban environments developing and changing over time in response to diverse and changing needs of people, communities and future generations.
d) Local authority decisions on urban development being integrated with infrastructure planning and are strategic over the medium term and long term.
e) Local authority decisions on urban development are responsive particularly for proposals supplying significant development capacity.
f) New Zealand's urban environments support reductions in greenhouse emissions and are resilient to current and future effects of climate change.
84. The key method to achieve these objectives is by development of a Future Development Strategy (FDS). This will set out how the Councils will provide for sufficient development capacity over the next 30 years to meet expected demand. There is no FDS for the greater Christchurch Urban Area that meets the requirements of the NPS-UD.
85. Work on development capacity completed for the NPS - UDC 2016 by the Greater Christchurch Partnership as an Update of the existing Urban Development Strategy (UDS) – Our Space 2019 confirmed what there was a shortage of feasible development capacity for future housing in Waimakariri District for the medium (next 10 years) and long term (10 to 30 years) periods. That assessment is now out of date as it does not address the requirements of the NPS-UD; and rates of take up of land have exceeded projected rates.

86. One of the key changes in the NPS-UD is that local authority decisions on urban development that affects urban environments are responsive, particularly to proposals that would supply significant additional capacity. It also amends the required methodology for housing and business capacity assessments.
87. The current CRPS does not meet the new NPS-UD requirement in relation to proposals for significant additional capacity. Regional councils are required to include criteria in the RPS to determine what plan changes will be treated for the purposes of Policy 8 as adding significantly to development capacity as soon as practicable. ECAN has yet to respond to this requirement.
88. The NPS-UD has immediate effect, so in the meantime, proposals such as this submission must be assessed in the context of the overall intent and purpose of the NPSUD as articulated in the NPS-UD objectives and policies. This includes that NZ has well-functioning environments; provides sufficient development capacity to meet the different needs of people and communities; planning decisions improve housing affordability to contributing to competitive house and land markets; and RMA plans enable more people to live near major employment areas, where there is existing or planned public transport, and where there is high demand for housing.
89. The NPS-UD is the higher order document and its requirements override those of lower order documents where there is a conflict, including regional and district RMA plans.
90. Key objectives and policies in the NPS-UD are assessed here:

NPS-UD Objective/Policy	**Assessment**
Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	The proposed development will further enable Rangiora to sustain itself as a well-functioning urban environment by consolidating the residential area close to the town centre, and provide residential development close to public transport links and existing community and commercial facilities including Huntingdon Drive local centre.
Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.	The proposal provides choices in the Rangiora housing market and in doing so supports housing affordability. Whilst the proposal is for a premier larger lot urban residential development, it is important that all sectors of the market are catered for. This will be more affordable than forcing those wanting large sections out to the much larger and very limited areas of LLR D1 development, or having to purchase 2-3 sections in a standard residential subdivision. There Site is in multiple ownership and the landowners are working together to achieve the rezoning. It will bring more competition into the market by bringing new entrants into the market.
Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply: the area is in or near a centre zone or other area with many employment opportunities the area is well-serviced by existing or planned public transport there is high demand for housing or for business land in the area, relative to other areas within the urban environment.	The CRPS is due for review in 2024 but in the meantime the existing CRPS is not in accordance with the NPS-UD 2020. The proposed rezoning is on the edge of the District's largest centre, which offers a wide range of community and business services, and employment opportunities. It is expected that a proportion of future residents will commute outside the township, but as the township and associated business areas e.g. at Southbrook, continue to grow, this is expected to become proportionally less. Rangiora is well serviced with public transport, there is scope for future mass transit PP, and there is a high demand for housing at Rangiora. The Site adjoins the new West Rangiora Development Area, to the south. Extensions of public transport to service this growth area will be readily accessible to the Site.
Objective 6: Local authority decisions on urban development that affect urban environments are: integrated with infrastructure planning and funding decisions; and strategic over the medium term and long term; and responsive,	Whilst not currently identified as a future growth area in RMA documents, the Site is well placed at the township edge to be serviced by existing infrastructure. Some upgrades may be required, which will be investigated further with Council prior to the hearing. See Policy 8 below for commentary on proposals which supply

particularly in relation to proposals that would supply significant development capacity.	significant development capacity
Objective 8: New Zealand's urban environments: support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change	The proposal adjoins the existing built up are of Rangiora, close to public transport links. Its excellent accessibility to Christchurch City, substantially enhanced with the new Northern Motorway extensions, means it is now highly accessible to these nearby major employment areas. Travel distances are relatively short, minimising vehicle miles and the potential for greenhouse gas emissions. There is a cycleway link from into Christchurch City, and regular bus services, including an express route. The Site is inland and not subject to natural hazard risks associated with sea level rise arising from climate change.
Policy 1 – Planning decisions for well-functioning urban environments	Assessed at para 41-50
Policy 2 - Sufficient development capacity Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.	The proposed rezoning is anticipated to provide sections that will be available for the short term (up to 3 years) and into the medium term (3-10 years) if adopting a more conservative outlook. The locational and amenity advantages of Rangiora also favour strong ongoing demand. The PWDP UFD-O1 Feasible Development Capacity for residential activities identifies the need for 6300 residential units in the period 2018-2028, and 7100 residential units 2028-2048. These numbers are derived from Chapter 6 CRPS Table 6.1. and are out of date. Data from the Council (November 2021) confirms that there are about 800 vacant lots in Rangiora. Building consents are at about 180/year. That means there is about 4 years vacant land supply. A lead in time of 3-5 years is needed to go from rezone to house build so the Council is facing an unnecessary squeeze on land availability. That will translate in to an upward shift in land and section prices as has been the case at Rolleston. The data suggests that the PWDP will be late to the party to ensure there is at least sufficient development capacity to meet expected demand for housing land over the short term, medium term, and long term. There is a looming, inevitable land supply issue so any proposal to add capacity will push the Council closer to meeting the requirements of the NPS-UD. The proposal is consistent with ensuring there is at least sufficient land supply for housing.
Policy 8 – Responsiveness to plan changes Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is: (a) unanticipated by RMA planning	The proposed rezoning is not anticipated by RMA documents - it is not a Greenfield Priority or Future Development Area in the CRPS, or a New Development area in the PWDP. A responsive approach to the proposal is required as it meets the Policy 8 criteria for unanticipated zoning. It will contribution to well functioning urban environments and will add significant development capacity. There is no development capacity for the housing typology proposed – so any provision is significant in this context. The development will deliver appx 311 high amenity large lot residential sites at an average density of 1500m2. This will be higher if a mix

documents; or
(b) out-of-sequence with planned land release

of densities are proposed, which may be appropriate in some parts of the Site, dependent on master planning work to follow.

91. Adopting the submission to re-zone the land, and enable the proposed development on the submission Site will satisfy the objectives and policies of the NPS-UD.

Proposed National Policy Statement for Highly Productive Land (NPS-HPL)

92. The Government proposed in 2019 a NPS-HPL to prevent the loss of productive land and promote its sustainable management. The overall purpose of the proposed NPS-HPL is to improve the way highly-productive land is managed under the Resource Management Act 1991 (RMA) to:

a) Recognise the full range of values and benefits associated with its use for primary production
b) Maintain its availability for primary production for future generations
c) Protect it from inappropriate subdivision, use, and development.

93. The NPS-HPL is still a proposal and not intended to take effect until after Gazettal. At the date of this submission the NPS-HPL has no effect and no assessment of it is required for the purposes of this submission.

94. The Proposed NPS-HPL interim definition of HPL is land defined as Land Use Capability Class 1-3 soils. A portion of the Site contains Class 2 and 3 soils (see **Figure 10)**. Highly productive use of these soils is not realistic given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production). Its present use as lifestyle blocks, low level grazing and agistment is the more likely long run use of the Site if not rezoned.

95. Objective 3 of the Proposed NPS-HPL specifically refers to highly productive soils being protected by avoiding *"uncoordinated urban expansion on highly productive land that has not been subject to a strategic planning process"*. The Site was assessed through a strategic planning process (WDDS 2018) and the RRS as a preferred site for LLRZ development, and rejected for a change in zoning on the basis that it may be required for long term urban growth of Rangiora.

96. It is therefore considered that this submission to re-zone the Site is largely in accordance with the Proposed NPS-HPL.

National Planning Standards

97. The National Planning standards prescribe various matters under the RMA so that there is consistency among planning documents most relevantly here in terms of appellations for zones, and the standards applying to these zones.

98. The proposed rezoning adopts the standard zone appellation, in this case LLRZ as contained in the PWDP.

99. The PWDP identifies plan standards for minimum and average net site areas for the respective zones. These are modified for the proposed rezoning as a higher density LLRZ.

100. The higher density LLR zoning is entirely consistent with the NPS purpose for the LLRZ as reproduced below. In this case, the principal constraint to more intensive development is the peri-urban location where a lower density transition to the rural environment is appropriate (particularly noting that the zone boundary is 'mid block' so there is no natural or physical buffer between rural and residential areas); the existing pattern of 4 ha lots with existing substantial homes and gardens; and the fact that the premier large lot subdivision proposed relies on consistency of housing quality and character to be deliver on this vision for the area.

Large lot residential zone

Areas used predominantly for residential activities and buildings such as detached houses on lots larger than those of the Low density residential and General residential zones, and where there are particular landscape characteristics, physical limitations or other constraints to more intensive development.

Low density residential zone

Areas used predominantly for residential activities and buildings consistent with a suburban scale and subdivision pattern, such as one to two storey houses with yards and landscaping, and other compatible activities.[2]

Canterbury Regional Policy Statement 2013 (CRPS)

101. Chapter 6 of the RPS *"provides a resource management framework for the recovery of Greater Christchurch, to enable and support recovery and rebuilding, including restoration and enhancement, for the area through to 2028. Recovery in Greater Christchurch is also supported by the provisions in Chapter 5 notated as 'Entire Region'. The provisions in the remainder of the RPS also apply.3"*

102. An assessment of the proposed rezoning against the relevant CRPS Objectives and Policies is set out in **Appendix 1**. This should be read in the context of the CRPS being overdue for review and that it does not provide a regional response to the NPS-

UD. The
need to focus on earthquake recovery has now passed and so many of the directive provisions need to be given appropriate 'weight' in a new national policy environment with a focus on flexible, responsive panning approaches that better provide for people's needs and well-being.

103. That assessment shows that

a) The development proposal achieves the objectives for the location, design and function of new developments (Objective 5.2.1)

b) The traffic effects of the proposal are unlikely to give rise to adverse effects and so achieves CRPS objectives for the strategic land transport network (Policy 5.3.7)

c) The Site falls outside the FDAs shown on Map A of Chapter 6 and in that regard is inconsistent with RPS Policy 6.2.1 clauses 1 to 3.

1. identifies priority areas for urban development within Greater Christchurch;

2. identifies Key Activity Centres which provide a focus for high quality, and, where appropriate, mixed-use development that incorporates the principles of good urban design;

3. avoids urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS

d) The environmental effects assessment outlined above establish that the proposed development is consistent and will not give rise to any concerns with respect to all the matters listed in RPS Policy 6.2.1 clauses 4. to 11. These matters are:

6.2.1 Recovery framework

Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that:

1. As above;

2. As above;

3. As above;

4. protects outstanding natural features and landscapes including those within the Port Hills from inappropriate subdivision, use and development;

5. protects and enhances indigenous biodiversity and public space;

6. maintains or improves the quantity and quality of water in groundwater aquifers and surface waterbodies, and quality of ambient air;

7. maintains the character and amenity of rural areas and settlements;

8. protects people from unacceptable risk from natural hazards and the effects of sea-level rise;

9. integrates strategic and other infrastructure and services with land use development;

10. achieves development that does not adversely affect the efficient operation, use, development, appropriate upgrade, and future planning of strategic infrastructure and freight hubs;

11. optimises use of existing infrastructure; and

12. N/A

e) The proposed rezoning achieves policies relating to:

- Sustainability;
- Integration of transport infrastructure and land use;
- Urban design; and
- Biodiversity, natural hazards, landscape, soils, contaminated land.

104. In terms of the CRPS polices for rural residential developments (Policy 6.3.9) the proposal sits square with all policy matters other than being a location identified in an adopted Rural Residential Strategy; and being at a higher density than provided for under this policy (ie greater than 1-2 hh/ha). As such it has a majority of features entirely consistent with the policy.

105. The CRPS includes housing capacity targets as below

6.2.1a Targets for sufficient, feasible development capacity for housing [inserted in accordance with sections 55(2) and 55(A) of the Resource Management Act 1991, from the National Policy Statement on Urban Development Capacity 2016]

For the period 2018-2048, sufficient, feasible development capacity for housing is enabled in Greater Christchurch in accordance with Table 6.1.

Table 6.1 Targets for housing development capacity in Greater Christchurch, 2018-2048

106. These derive from Our Space, under the requirements of the then NPS-Urban Development Capacity 2016, since replaced by the NPS-UD 2020. The targets (known as bottomlines in the NPS-UD) are to be treated as 'minimums' not 'maximums'.

Policy 6.3.12
enables urban development in the Rangiora and Kaiapoi FDAs (new Development Areas in the PWDP) where needed to meet the medium term targets. This a 'minimum' allocation approach contrary to the NPS-UD. The NPS-UD favours over allocation, including in locations unanticipated by RMA plans, where it will add additional development capacity, can be integrated with infrastructure planning and funding, and will contribute to well functioning urban environments – as is the case the proposed Lehmans LLR D2 zone.
107. The proposed Lehmans LLR D2 zone is consistent with the CRPS except with respect to those parts of the CRPS which are out of step with and do not give effect to the higher order plan, the NPS-UD.

Proposed Waimakariri District Plan
108. An assessment of this proposal against the relevant PWDP Objectives and Policies for urban growth and development as notified on 17 September 2021 is set out in **Appendix 2.**
109. That assessment shows that the proposed rezoning is entirely consistent with the relevant objectives and policies, including as sought to be amended by this submission. Those amendments are to UFD-P3 Identification/location and extension of Large Lot Residential Zone areas; and LLRZ-O1 and LLRZ- P1-5 and reflect the intent and outcomes intended for the proposed LLRZ D2 zone, which is a higher density LLRZ zone than the PWDP LLRZ zone (renamed LLRZ D1 in this submission).

ASSESSMENT AGAINST OTHER PLANNING DOCUMENTS
Our Space 2018-2048 Greater Christchurch Settlement Update (2019)
110. Our Space is a non-statutory document prepared under the Local Government Act. It
"responds to the new Government Policy Statement on Land Transport, which has increased funding for mass public transit schemes, and meets the requirement of the National Policy Statement on Urban Development Capacity (NPS-UDC) 2016 to prepare a
future development strategy…. Specifically, it:
• sets out how targets for housing for the next 30 years will be met, accommodating an additional 150,000 people;
• identifies locations for housing growth, encouraging Central City and suburban centre living while providing for township growth in Rolleston, Rangiora and Kaiapoi;…
• promotes a compact urban form, which provides for efficient transport and locates development in a manner that takes into account climate change and sea level rise.[4].

..Underpinning this settlement pattern approach is the vision for a transformation of the transport network that fosters much greater public and active transport usage, and reduced reliance on the private vehicle.
111. Our Space acknowledges that this will require commitment from the Government to invest in the necessary improvements to our transport system, which could include investing in rapid transit services. To date, there has been no successful business case for improved public transportation, including not as a Covid 19 fast track infrastructure project.
112. The Our Space housing capacity targets (Table 3) and Future Development Areas are related to growth of urban areas.
113. Our Space, like the CRPS (and the Operative District Plan) are now out of date, as they do not reflect or give effect to the new requirements of the NPS-UD.

Waimakariri 2048 District Development Strategy (WDDS)
114. The preferred growth directions for Rangiora in the WDDS 2048 (2018) are outlined above (under 'Site') i.e. westwards to Lehmans Road, and otherwise eastwards. However, the Council in its decision on the RRS, recognized west of Lehmmans Road as a potential longer town urban growth area.
115. The WDDS Rangiora Snapshot (pp38-39) -when looking ahead to 2048 proposed that:
a) Rangiora remains the District's largest town
b) 30,000 – estimated population (2048)
c) 12,025 – estimated households
d) 5,025 - new households in Rangiora
e) Continues to accommodate one third of the District's residential growth
f) 167 – estimated annual building consents for new dwellings for the next 30 years
g) 423 hectares of additional feasible residential land required by 2048 (this includes capacity in remaining stages of existing residential developments as well as new greenfield areas inside and outside of the Infrastructure Boundary)
h) Future residential growth directions proposed to the east (predominantly) and west of the current town
i) Opportunities for intensification/regeneration to be identified
j) New growth directions take into account areas of unacceptable natural hazard risk and areas of significant environmental and cultural values
k) New growth areas to connect into existing sewer and water networks

l) Stormwater Levels of Service designed to meet increased performance requirements

116. At the 2018 Census Rangiora had a population of 17,841, and 7314 total dwellings (incl those unoccupied and under construction). Population projections for the District show an average annual change 2018-2020 of 1700 persons. If Rangiora continues to attract a third of all district growth as stated in the WDSS then Rangiora's population in 2021 will be around 18,900.

Mahaanui Iwi Management Plan

117. Part 1 of the PWDP in a section "Mana Whenua" sets out the position with respect to iwi and the review of the district Plan:

a) The District's territorial area sits within the takiwā (territory) of Ngāi Tūāhuriri which is one of eighteen Ngāi Tahu regional papatipu rūnanga, constituted under the ***Te Rūnanga o Ngāi Tahu Act 1996*** *to represent* ***mana whenua*** *interests.*

b) The preparation and change of a district plan must take into account relevant iwi documents. For the District, Ngāi Tahu has set out its resource management values, issues, objectives and policies within the Mahaanui Iwi Management Plan (2013).

c) The Mahaanui Iwi Management Plan identifies objectives, issues and policies for natural resource and environmental management for six pāpatipu rūnanga (including Te Ngāi Tūāhuriri Rūnanga). It seeks to ensure that the taonga and resources of Ngāi

Tahu mana whenua are recognised and protected in the decision-making of statutory agencies. The Mahaanui Iwi Management Plan contains a comprehensive suite of policies and objectives addressing the range of resource management matters of significance to tangata whenua. The District Council shall have regard to the Mahaanui Iwi Management Plan when preparing or changing the District Plan, to the extent its content has a bearing on resource management issues of the District.

118. The Mahaanui Iwi Management Plan (MIMP) 2013 was released on 1 March 2013.

119. The MIMP is a tool for tangata whenua to express their identity as manawhenua and their objectives as kaitiaki, to protect their taonga and resources, and their relationships with these. The MIMP seeks to ensure that these taonga and resources are recognised and protected in the decision-making of agencies with statutory responsibilities to tangata whenua. Importantly it is also a tool that assists Papatipu Rūnanga representatives to articulate their values, issues and policy into statutory processes.

120. The MIMP includes both general objectives and policies about the management of land, air, and water, and also includes catchment specific objectives and policies.

121. Section 5.3 Wai Maori (pp77-98) contains an extensive discussion about tangata whenua rights and interests in freshwater. It provides a suite of Issues, Objectives and Policies for freshwater

122. Section 5.4 Papatuanuku (pp101-124) sets out the Ngai Tahu Subdivision and Development Guidelines that are to be read along-side objectives relating to:

a) Land use planning and management in the takiwā reflects the principle of Ki Uta Ki Tai. (from the mountains to the sea)

b) Rural and urban land use occurs in a manner that is consistent with land capability, the assimilative capacity of catchments and the limits and availability of water resources.

c) Inappropriate land use practices that have a significant and unacceptable effect on water quality and quantity are discontinued.

d) Ngāi Tahu has a prominent and influential role in urban planning and development.

e) Subdivision and development activities implement low impact, innovative and sustainable solutions to water, stormwater, waste and energy issues.

123. Section 5.5 Tane (pp127-137) includes objectives that focus on:

a) Regional policy, planning and decision making in the takiwā reflects the particular interest of Ngāi Tahu in indigenous biodiversity protection, and the importance of mahinga kai to Ngāi Tahu culture and traditions.

b) The customary right of Ngāi Tahu to engage in mahinga kai activity is recognised, protected and enhanced…

c) Customary use, and therefore mahinga kai, is given effect to as a first order priority for freshwater management in the takiwā.

124. Section 6.4 (pp213-224) addresses issues of particular significance to the lands and waters of the Waimakariri catchment within which the Site lies.

125. Relevant Objectives relating to urban development of land in that catchment include:

a) The natural "energy, vitality and life" of the Waimakariri River as a braided river is protected and restored.

b) The discharge of contaminants to the Waimakariri and its tributaries is eliminated.

c) Water quality and flows in the Waimakariri and its tributaries are improved to enable whānau and the wider community to have places they can go to swim and fish.

d) The mauri and mahinga kai values of the Waimakariri and its tributaries and associated springs, wetlands and lagoons are protected and restored; mō tātou, ā, mō kā uri ā muri ake nei.

126. A key issue relating to subdivision and development is that subdivision and development activities in the lower catchment

have the potential to adversely affect Ngāi Tahu values such as waterways, mahinga kai and sites of significance (Issue Wai4).
127. The proposal provides for full urban reticulation of the three waters and is consistent with the objectives and policies contained in Chapters 5.3 and 5.4 of the MIMP. The proposal does not preclude individual land owners from installing rainwater collection and use from roof areas at the time of building development.
128. The proposal has been designed taking into consideration the potential effect of resultant subdivision and development on the rivers and streams that flow into the lowland rivers.
129. Overall it is considered that the proposal will not have adverse impact on the cultural values of iwi as set out within the MIMP.

SECTION 32 ASSESSMENT

130. A Section 32 assessment is contained in **Appendix 3.**
131. In summary, the PWDP zoning and associated rules (RLZ Zone with a minimum lot size for subdivision and a dwelling 4ha) do not meet the needs and aspirations of the current owners.
132. Strategic Council planning documents (specifically the WDDS) have a focus on only meeting urban growth demands within urban environments of existing towns. They favour intensification (15hh/ha) and a strict allocation of capacity by development areas. It is a control and command regime consistent with Map A of Chapter 6 of the CRPS but is out of step with the requirements of the NPS-UD which requires a more flexible, responsive approach, prohibits a hard fixed unmoveable urban/rural boundary.
133. This approach leaves little room for new proposals or proposals that do not sit square with the standard array of GRZ/medium density or SETZ (Settlement Zone). SETZ applies to some of the District's smaller settlements outside Greater Christchurch.
134. Neither LRZ nor Large Lot Residential (LLRZ) as notified in the PWDP is an efficient use of this block of land located as it is immediately adjoining the urban area of Rangiora, and in a location easily accessible to the town centre by active transport modes as well as car and several district reserves.
135. If this Site is not zoned for LLRZ D2 (minimum average lot size 1500m^2) use to enable residential re-development then it will drive pressure to re-zone elsewhere. That step potentially will not have the significant benefits to Rangiora long term in relation to enabling a well-functioning urban environment that enables people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future. Additionally re-zoning to LLRZ D2 will contribute to providing additional development capacity to meet the different needs of people and communities in a planned manner and consistent with the NPS-UD.
136. The Site can readily be developed to reflect the principles of the Urban Design Protocol with values of character, context, and connectivity.
137. The Section 32 assessment concludes that the proposal to re-zone the Site from LRZ zone to LLRZ D2 Zone (average lot size 1500m_2) is the most appropriate method for achieving the objectives of the proposal, than the other alternatives considered.
138. Option 2 identified in the s 32 assessment is consistent with some PWDP policies notwithstanding that it does sit square with the strategic intentions signaled in the WDDS and the PWDP approach to providing for development capacity and urban development.
139. Option 2 identified in the s 32 assessment to re-zone the Site is the most appropriate given:
a) The proposals adopt the PWDP zones, development and activity standards with appropriate amendments. This ensures continuity of the District Plan anticipated environmental outcomes and urban amenity for Rangiora and adjoining residential areas;
b) Will be consistent with and give effect to many of the relevant PWDP objectives and policies;
c) It is a logical extension to the developed and developing residential land adjoining the Site while achieving a compact, efficient urban form that removes pressure on isolated rural land elsewhere around Rangiora.
d) It gives effect to the NPS-UD, specifically Objective 6 c) and Policy 8, delivering significant additional development capacity and contributing to a well functioning urban environment.
e) It is assumed that there will be capacity in the public utilities and the existing road network, including planned upgrades, to accommodate the traffic effects of the redevelopment;
f) The proposed Site specific ODP will provide certainty of the final form and disposition of the re-zoned area including its proposals for reserves, roading, future linkages for pedestrian and vehicular traffic.
140. The re-zoning proposal is considered to be appropriate to achieve the sustainable growth and development of Rangiora.
141. The economic, social and environmental benefits of the proposed rezoning outweigh any potential costs.
142. The overall efficiency and effectiveness of the proposed rezoning (Option 2) is high, in comparison to the alternative options set out in the s 32 Assessment which are low (Options One and Four) or low to moderate (Option Three).
143. The PWDP proposes to release land for development in the new Development Areas at Rangiora and Kaiapoi through a novel and untested certification process that is not clearly derived from RMA statutory powers, nor Local Government Act 2002 (LGA) authority. This approach is not proposed for the LLR Overlay areas. As the proposed Lehmans Road LLR D2 zone proposed by this submission seeks large lot urban densities, it is anticipated that Council may favour the certification process if it accepts the proposed rezoning. This is opposed – rezoning to LLRZ D2 is sought.
144. Potential difficulties with the proposed certification process are identified and discussed in the Section 32 Assessment.

(**Appendix 3)**. In summary, the process is hugely discretionary, does not provide conventional rights to an applicant (eg right of objection/appeal) meaning decisions cannot be challenged, and it is not apparent that the process will be appropriately documented with a transparent record of the decision-making within the certification process. Further uncertainty arises in the practicalities of how to negotiate and manage the staging, funding and building of key infrastructure across a range of Sites, and a risk that land supply is controlled by a limited number of large developers. It is a far less efficient and effective method for delivering land for housing than the Council rezoning the land in the PWDP.
145. The proposed rezoning is considered to be the most appropriate, efficient and effective means of achieving the purpose of the RMA.

CONSULTATION
146. The landowners and their consultants have submitted on the WRRS and the WDDS (**Appendix 4)**.
147. The submissions to re-zone as rural residential or identify the Site as suitable for LLRZ have been rejected as noted above. LLRZ but at higher densities as now proposed is considered to be a more efficient use of the land and better meets market demand. 5000m^2 sites provide more land is needed for a spacious home and garden.
148. The landowners have been consistent in their wish to find a zone and possible land uses better suited to their needs.

CONCLUSION

173 The submission seeks to rezone 58 ha of land adjoining Rangiora from Lifestyle Rural Zone (LRZ) to Large Lot Residential with a specific density standard (LLRZ D1), minimum average lot size 1500m^2.
149. The Site has a long history of rural lifestyle use. It is not significantly restricted by potential natural hazards especially flooding, nor does it have physical limitations for development for residential purposes as it is not liquefaction prone, and has no known geotechnical limitations but does contain an area of LUC 2 soils. It is near a site of significance to iwi (SASM – 025) being the Rakahuri/Ashley River The Site has access to a collector road and is near to a strategic road giving direct access to the town centre and a range of community amenities and facilities.
150. The Site immediately adjoins the urban area of Rangiora, and is well located to join in to Council utility services. It is well suited for conversion to residential use.
151. The Site is not identified within the westward growth direction for Rangiora in the District Development Strategy 2018 nor is it part of the DEV-WR development area which adopts Lehmans Road as its western boundary. It is in a location that achieves coherent and compact urban form offering ease of access to business services, community facilities, reserves and the primary road network.
152. The proposed rezoning provides for a connected and high amenity residential living environment not presently available under the PWDP while avoiding and/or mitigating any potential adverse effects on the environment. It will provide for continuing high demand for a variety of high quality residential sections aimed at a particular segment of the housing market in an ideal location, easily accessible to the existing town centre services and facilities. It will broaden the range of housing available. As such, it is consistent with the NPS-UD including Objective 6c) and Policy 8, to be responsive to proposals which supply significant development capacity and contribute to a well functioning urban environment.
153. The use of this Site for residential purposes can be a sustainable and efficient use of land and infrastructure. The proposed rezoning better provides for the social, economic, environmental well-being of the landowners and the Rangiora community than continuation of the current low intensity lifestyle land use on 4ha blocks, or a conventional LLRZ residential use.
154. Any potential adverse effects of the implementation of the proposed rezoning can be assessed at subdivision stage but there has been no restriction on servicing the blocks to date. Capacity will need to be confirmed for infrastructure, power and road network. Any future subdivision of the Site will need to confirm water supply and wastewater treatment and disposal options.
155. Rezoning of the site to LLRZ zone is not inconsistent with the policies and objectives of the PWDP, but it is at odds with the dated CRPS approach to provision of urban growth and housing capacity for Greater Christchurch, to the extent that it is not within an FDA created by Change 1 to the CRPS and is not identified as an LLRZ site under the strategic RRS prepared by the Council.
156. As the proposal helps achieve the purpose of the RMA, and has been shown to be consistent with the relevant provisions of the NPS-UD, the submission can be accepted by Waimakariri District Council.

Original Submission

Summary Reasons for the Submission

The reasons for our submission are outlined below.
a) The preferred relief (**the proposed rezoning**) is both appropriate and necessary to achieve sustainable growth and

development of Rangiora and the District and meet the requirements of the National Policy Statement for Urban Development 2020 (**NPS-UD**).

b) The Site identified in Figure 1 and at para 1 of the Preferred Relief above is a logical and preferred location that lends itself to a specific type of housing development not provided within the PWDP as a residential option adjoining but outside the existing urban areas. Nowhere is it possible to develop in a comprehensive, coordinated way a low density, high quality residential environment in the District's towns, the Rural Lifestyle Zone or Settlement Zone as a permitted activity.

c) The requirement for 12/15 hh/ha in GRZ zones (the majority of land in urban areas) drives development to modern scale relatively small urban lots best produced as a package across a significant land holding. The GRZ subdivision standards do not provide for the needs of people who seek a generous sized urban lot residential setting. This is a housing sector that is running against the planning tide of intensification but is, nonetheless, a legitimate form of housing in an appropriate setting. The barriers to such development in urban areas requires an appropriate setting/ location in the rural areas but close to or adjoining the urban areas and at a much lower density than is desired or appropriate (the PWDP LLRZ) to meet the housing needs for generous sized urban lot residential living..

d) The PWDP subdivision standards for LLRZ require lots that are very large for those whose primary interest in a rural setting is a form of residential living, not one that requires significant maintenance and management often involving animals or machinery at scale. Conversely, the GRZ subdivision standards do not provide for the needs of people who seek a large lot residential setting

e) The focus in the PWDP is on prescribing a limited range of residential options and tightly controlling and constraining housing choice within those options. Further urban growth is also tightly constrained and controlled around DEV areas around Rangiora and Kaiapoi but for a very specific form of residential development driven off density requirements that do not match the needs of all landowners.

f) The focus in most new District Plans, driven in part by the National Planning standards, is to simplify the range of zones, to standardize lot sizes, to supposedly create efficiency and certainty through ease of administration of the District Plans. This is done by constraining housing and land development choices by lot size, by location, by built standards and the disposition of built/open elements in a site. However, the National Planning standards do provide for large lot urban residential living, a residential living option which has not been taken up the PWDP (due most likely to the restrictive provisions of the CRPS which only prescribe one from of lower density residential living, at a density of 1-2 hh/ha).

g) This planning approach may be a standard approach to resource allocation but it does not provide a flexible, responsive approach to innovative and new development options. The Government is creating policy settings that on one hand seek intensification in urban areas, while at the same time pushing away from a land allocation model of planning. The PWDP in striving to face both policy directions has a package of measures that are in fact a major barrier in terms or cost, timeframes and certainties for proposals that are not cut from the suite of housing and development options set out by the PWDP. The allocation of land in preferred development areas, it must be said, runs counter to the Government's push, and now its direction, to free up land for development, to encourage innovation in housing (presently with a focus of intensification) and to make available a range of responses to the need to meet the housing needs of people and communities set out in the NPS-UD.

h) While the weight of demand (and the planning response) is around affordable housing, around small lots and dense development that supports investment in public facilities and amenities such as public and active transport, reserves, and commercial services, there is always a wide spectrum of preferences at play in the housing market. The demand for high quality, generous houses set on generous sized parcels of land within high amenity settings is an important and no less relevant housing sector. There is a strong unmet demand, as confirmed by advice from Bayleys real estate (**Appendix 5**) for larger family homes with room for a pool or similar. Purchasers want to be close the amenities of Rangiora and within walking and cycling distance of local schools. They do not want the only available options – a 4 ha lifestyle block or 5000m^2 rural residential site at Mandeville or Ohoka.

i) Interestingly enough for a nation built on the so-called quarter acre paradise, recent policy and planning interest in housing and land development has now seemingly positioned the 1011m^2 section as a luxury item, as the antithesis of providing for community well-being and needs. It is as though the old quarter acre of itself acts against building a sense of community despite being able to be developed in a planned, structured, coordinated or integrated manner. Rather than being a frivolous discretionary item in land development
and housing choice, a well-planned, well located and properly serviced low density residential environment has much to offer urban environments. They can be tactically used to provide shape and edge to urban areas, they can provide a mass of amenity different from (and potentially complementary to), but no less legitimate in urban outcome terms, to conventional GRZ zoned land.

j) In many ways the approach of a district plan to the role and place of the old quarter acre is not dissimilar to the issues faced by comprehensive retirement villages when first proposed. The idea of dense, almost gated and self-contained communities, with multi storey buildings also did not sit well in many district plans. But now they are accepted as an important part of the urban fabric catering to a specific demographic and health demographic. Most plans enable them.

k) Provision for low density residential in an urban setting, or failing that likelihood, in an adjoining rural zone is a fundamental gap in the district plan.

l) The submission seeks to provide for another housing typology not provided in the PWDP and in a location with significant planning merit. The planning case was made out in a detailed submission to the proposed Rural Residential Strategy (**RRS**) for

the land identified in this submission to be “reserved” for conventional Rural Residential zoning in the review of the District Plan. That submission was rejected in favour of a decision ascribing an unspecific strategic significance to Lehmans Road as the urban boundary; simply the decision was that rural residential development here would preclude this area as a future urban growth path, even though this was likely to be very long term as the Waimakariri District Development Strategy (WDDS 2018) for the period up to 2048, does not favour urban growth west of Lehmans Road.

Officer Recommendation

Continue to exclude the area west of Lehmans Road and the racecourse land at Rangiora as growth areas as these were originally considered but not included in the draft RRDS as they trigger the key preliminary criteria of: being on the direct edges of a main town outside of the Projected Infrastructure Boundary (PIB) thereby foreclosing more intensive long-term urban development, and…

Panel Recommendation

The panel accepted the officer recommendations to exclude areas on the fringes of Rangiora in the final RRDS due to these having the potential to foreclose more intensive long-term urban development of the town.

m) In light of the above decision on the Waimakariri Rural Residential Strategy, the proposal now is for a form of high amenity low density urban zoning, which whilst in demand is entirely absent from the PWDP. This will be a long term urban form of development. The proposal set out in the submission will achieve a compact, and efficient, urban form on the edge of Rangiora with excellent connectivity by multiple transport modes. It provides for continuous urban development by enabling a built form which can act as a strong zone or urban boundary.

n) The proposed rezoning will accommodate approximately 311 LLRZ lots1 at the proposed amended density standards for LLRZ D2 (average size 1500m^2). It will contribute to a well-functioning urban environment, meeting the NPS-UD Objective 6(c).

o) Any adverse effects on the environment arising from the proposed rezoning will be minimal, if any, and can be adequately mitigated. A high amenity master planned development is proposed.

p) Significant positive effects arise from the proposed rezoning. It will enable the short term housing demand at Rangiora to be met, and can deliver a housing typology for which there is demand, on lots that are not a burden to the landowners (which is the case for 4ha and the very limited areas of LLRZ D1 with a density of 1-2 hh/ha) and for which there is no provision in the PWDP. At present rates of land uptake there is about 4 years vacant land supply in Rangiora. Given it takes 3-5 years to bring land from zoned state to on the market as developed lots, there is some urgency in providing additional capacity. This proposal helps address an anticipated shortfall in residential zoned plan enabled land.

q) There is no additional cost to the Council in re-zoning the Site as there is expected to be capacity in the public utilities and the existing road network, including planned upgrades.

r) Amendments to PWDP objectives and policies may be necessary to provide for a higher density LLRZ, but of themselves will not act against those relating to Strategic Directions Urban Form and Development and Urban Growth. The PWDP approach to zones and
identification of future development land is already out of step with higher order Resource Management Act 1991 (RMA) statutory documents because they do not give effect to the NPS-UD (and are sought to be amended through this submission).

s) The alternatives of retaining Rural Lifestyle or Large Lot Residential zone across the entire Site are not an efficient use of land which immediately adjoins the urban area of Rangiora, and is highly accessible to the town centre by active transport modes as well as car.

t) The proposed rezoning is consistent with and the most appropriate, efficient and effective means of achieving the purpose of the RMA.

The Site

1. The Site is a 58ha block of land (‘the Site’) accessed from Lehman Road, Rangiora **(Figure 1)**. It is owned by the two submitters and 12 other landowners.

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1 Assumes 20% of land area taken for servicing including roading, reserves and stormwater management if required.

Figure 1: The site (outlined in blue (Google Earth)

2. The Site is surrounded by RLZ land that is used for a mix of lifestyle and conventional farming. To the NE is the Rangiora Eco Holiday Park, and beyond the Park is the Rangiora Racecourse about 300m away from the nearest lot and 1km from the centre of the Site. Land to the south east is GRZ and part of urban Rangiora with newly developing residential land west of West Belt. About 1.9 km to the NW is Rangiora Airfield. About 1km north of the most northern lot is the Ashley River.
3. The southern-most lot in the proposal with the Rangiora Vet Clinic faces, but does not have access to Rangiora-Oxford Road (State Highway 72). This arterial road provides the main road connection in to the centre of the town. The well-established Fernside Rural residential area is about 2.5km west from the junction of Lehmans and Rangiora-Oxford Roads.

Figure 2: the site is a broader context (Site marked red)

4. The Site is not identified as lying within a preferred growth direction for Rangiora in the Waimakariri 2048 District Development Strategy (2018) (**WDDS**) **(Figure 3)**. No land west of Lehmans Road is included in the West Rangiora Development Area (**DEV-WR**) in the PWDP.

Figure 3: Figure 11 WDDS

5. The Council reviewed its strategic approach to the location and provision of Rural Residential land (now zoned LLRZ in the PWDP) in the WDSS. It adopted the position that it would:

a) Explore tools such as cluster development to manage rural character

b) For rural residential development, adopt an approach that has a primary focus on creating new rural residential areas, with a secondary focus on enabling large lot intensification within existing rural residential areas where there is sufficient community support and servicing available

c) Review the Rural Residential Development Plan for the whole District (pg 21 WDDS).

6. Rangiora presently has a population of 17,841 (2018 Census). It grew steadily between 2006 and 2018. Growth of Rangiora since then has continued in step with the district growth which has increased 8.2% between 2018 and 2021 from 61,300 to 66,300 at an annual average of 2.8% from 2018 to 2020 (Statistics NZ Subnational population projections at 30 June 2021: provisional).

2006 (count)	2013 (count)	2018 (count)
12,165	15,069	17,841

Statistics NZ

Population projections at 30 June

PLANNING STATUS OF THE SITE

Chapter 6 of the Canterbury Regional Policy Statement

7. An assessment of the CRPS is set out in **Appendix 1** to this submission.
8. The Site is within the Greater Christchurch area.
9. It was not shown as a Greenfield Priority Area – Residential (GPA) on Map A of the Canterbury Regional Policy Statement (CRPS). The GPA terminates at Lehmans Road.
10. As a result of the Minister for the Environment's decision of 28 May 2021 on Change 1 to Chapter 6, an area largely south of Oxford Road and a finger of land to the north of Oxford Road was included as a Future Development Area (**FDA**) (**Figure 4** orange).

Figure 4: Map A Chapter 6 Regional Policy Statement Greenfield Priority areas
Site location identified with red circle (appx)

11. The FDAs are intended to accommodate the increased demand for new dwellings in that part of Waimakariri District within the Greater Christchurch Urban Area and to respond to the NPS-UD. They do not provide "plan enabled" land as they need to negotiate a rezoning process to confirm their status as land developable for housing and other urban purposes.
12. The proposal for a LLRZ zone with average lot sizes of 1500m2 is inconsistent with the policy approach of Chapter 6 for Greater Christchurch, in that if fits none of the residential living typologies provided for in Chapter 6 and is not in a location identified for urban or rural residential development. It sits 'between' the urban and rural residential densities provided for in the CRPS (minimum 10 hh/ha for urban in Waimakariri, and average 1-2 hh/ha for rural residential). The proposed density is appx. 6.66 hh/ha.
13. Notwithstanding, the proposal meets all the location and other criteria in CRPS Policy 6.3.9 for rural residential development. It is:

- Outside the CIAL noise contours
- Has some sites with restrictions from the take-off and landing vectors for Rangiora Airfield but not such as to impact its operational capacity.
- Is outside the groundwater protection zone
- Is not within the Waimakariri stop bank system
- Has no views of or to the Port Hills
- Has good access for emergency services
- Will not create reverse sensitivity issues with adjoining land uses; Rangiora Racecourse is 500m away.
- Free of significant natural hazards and is a flat site.
- Supports no significant natural values or ecological values.
- Contains no SASMs.
- Can be integrated into or consolidated with the existing urban area of west Rangiora.
- Contains no surface water bodies so there will be no adverse impacts on these.
- The development will be contingent on an ODP to provide integrated design for subdivision and land use, and provide for the long-term maintenance of a high quality high density rural residential character.
- The proposal is not intended as a staged development towards full urban; rather it is intended to provide a unique residential environment that can stand alone and contribute to the urban fabric of Rangiora like Palmview in east Rangiora, or as Kaiapoi Lakes does for Kaiapoi.

14. Overall, the proposal is not consistent with Chapter 6 but that is more a function of its original purpose when formulated in 2013. Notwithstanding that, the submission for a lower density residential focussed, high quality urban environment that attaches to an existing urban area and that promotes a coordinated pattern of development has planning merit.

Operative Waimakariri District Plan
15. The Site is zoned Rural in the Operative Plan. The minimum lot size for subdivision and a dwelling is 4 ha.
Proposed Waimakariri District Plan
16. The Site is zoned Rural Lifestyle Zone **(LRZ) (Figure 4).** The minimum lot size for subdivision and a dwelling in the LRZ is 4 ha.
17. Oxford Road is a strategic road and Lehmans Road is a collector road.

Figure 5: Proposed District Plan Zoning (site outlined in red)

18. The Site is also subject to, or potentially influenced by, a number of Overlays:
    a) Rangiora Airfield Take Off Climb and Approach Obstacle Limitation Surface (**Figure 6**)
    b) National Grid Transmission Lines (**Figure 6**)
    c) Liquefaction: Liquefaction damage is unlikely (**Figure 6**)
    d) Non-Urban Flood Assessment Area (**Figure 7**)
    e) Geographic areas: Ecological Area – Plains

f) Ecological District – Low Plains

Figure 6: Rangiora Airfield Take-off and Approach vectors (blue dashed lines); Liquefaction damage unlikely (green)Transmission lines (green lines); Site outlined in red

Figure 7: Non-urban flood assessment & Waimakariri Flood Hazard maps
Blue – medium risk, green – low risk, white – very low

DEVELOPMENT PROPOSAL AND PROPOSED REZONING

19. Subdivision of the Site will create approximately 311 LLRZ D2 lots.
20. The key design drivers for the proposal are:

a) A high amenity premier residential zone with large houses on large sites – average 1500m^2, min 1000m$_2$ based on the St Kilda, Hamilton development concept (**Figure 8**).

b) LLRZ D2 standards would enable a lower density zone in the medium term e.g. 10 years to achieve a high quality consistent character subdivision. If developed as an integrated development subject to an ODP subdivision can be staged for to the proposal.

c) Creating strong connections with the immediate neighbourhood by providing a cohesive interconnected roading layout that picks up direct links to the eastern neighbourhood off Lehmans Road and the northern subdivision roading, and carries them into the Site.

d) Creating a high amenity and diverse residential neighbourhood by providing interfaces to roads, reserves and rural environments.

e) Respecting and building on local identity and character of Rangiora by retaining specific vegetation features from the Site, and anchoring the development into the wider landscape.

21. A development concept can provide for sound urban design by:

a) A hierarchy of movement corridors.

b) Prioritisation of walking and cycling.

c) A north-south alignment of street blocks to maximize solar access and provide for efficient use of lots.

d) Block perimeters being kept as small as practicable to aid permeability and higher public amenity.

e) Enabling a range of housing typologies set in high quality landscape and street setting with generous amenity plantings and curtilage.

Figure 8: St Kilda development images (Bayleys)

22. St Kilda, Cambridge is a premier development on the outskirts of Cambridge, centrally located and with easy access to the Waikato Expressway. It was originally part of a small dairy operation which was dissected by the Waikato Expressway, leaving a portion within the Cambridge Town boundary and the larger balance of the property of approximately 80 ha (which became St Kilda) on the Eastern side of the Expressway, left in the Rural Zone.
23. The initial development concepts were for a Rural Residential type development given the Expressway separation of the existing residential development on the Western side of the Cambridge Bypass, however this was not supported by Council and a new concept of larger residential sections of a 1600m² average size was developed and approved – see https://www.stkilda.nz/page/location/

EFFECTS ON THE ENVIRONMENT

Township growth and urban form

24. The Site immediately adjoins the western edge of urban Rangiora.
25. The WDDS indicated a general preference for the direction of urban growth of Rangiora to the east as a way of balancing up the residential areas around the town centre and some growth to the west.
26. The approach of the WDDS was to signal growth options to be confirmed in the District Plan Review:

The broad directions for greenfield residential growth for the District's main towns are set out in Figures 11 to 14. Further work will be carried out to identify and confirm the exact locations and extent of these residential growth areas, together with the intensification opportunities within existing urban areas. These will be enabled through the District Plan Review and other planning tools.

27. The Strategic Planning documents clearly signal active consideration of growth needs and growth directions. The options available to the Council were constrained by the approach of the CRPS as the District Plan has to give effect to the CRPS and cannot be
inconsistent with it. The CRPS took effect in 2013 and is overdue for review.
28. The CRPS tightly holds urban growth to the constraints of Map A Chapter 6 and the identified FDAs which although amended by Plan Change 1 in 2020 does not respond to the directions of the NPS-UD. In any event the approach is focused on the need for housing in full urban residential land, less on other residential development forms.
29. As such the Site falls outside the planning policy framework for urban growth. However, in terms of urban form and on the ground, there is considerable merit and logic to conversion of this existing LRZ land to a new high amenity residential form that can be integrated into the Rangiora urban fabric.
30. The proposal has the potential to anticipate the longer term growth path confirmed by the decisions on the RRS to protect the future growth option of more intensive urban development in this direction. It can set a pathway to further westward expansion on land
that holds few if any physical barriers to land development.
31. The proposal will contribute to the housing needs of Rangiora and in a form and location that does not undermine the long run urban form of Rangiora. Planned growth confirmed in the PWDP is already intended to extend westwards out to Lehmans Road and to keep the town edge squared up providing depth to future development and providing a rational basis for providing movement networks driven off the key roads such as Rangiora-Oxford Roads. The West Rangiora Future Development Area confirms this approach. The Site sits in the next block west of Lehmans Road so is not proposing a disjointed urban form, nor one that is not part of the long term thinking of urban form and growth for Rangiora.

32. A full residential zoning is proposed under LLRZ D2 and will provide a high quality street character, overall amenity and passive surveillance over the street, and will create the correct lighting standards, roading standard, fully formed footpaths and cycleways required for a high quality urban environment.

Neighbourhood and wider community effects
33. The Site is serviced by a collector road and is close to an arterial road. This provides for ease of access and safe and convenient movement to and from the Site. A planned development co-ordinated by an ODP can facilitate within the site movement corridors and linkages through the Site to provide for walking and cycling.
34. A key positive neighbourhood and community effect will arise from the existing dwellings and their established gardens and plantings that will anchor new development and provide a point of reference for new dwellings. Development will not be on a bare site; it will take place in an existing established part-residential setting. The transition to a low density, high quality premier residential development will start from a favourable position and minimise the apparent extent and nature of the landscape change.
35. The Site is comparatively large (58.4 ha) and has the potential to support a variety of residential building typologies and this will contribute to a mix of households within the development and provide built form variety and interest in the streetscape. Whilst LLR D2 standards are proposed, it may be that part of the Site is suitable for other higher density forms of development, which would be within scope of the alternative relief, and could be considered as part of the master planning process required for preparation of an ODP (ahead of the hearing). The earlier stages of the St Kilda development were for large lot residential, with more clusters of townhouses included as later stages (and a retirement village). A retirement village is unlikely in this case, given the proximity of the Charles Upham Retirement Village.
36. Rangiora is well-positioned to accommodate and service the needs of a fast-growing resident population that will in turn support more business activity, schools, community facilities and community organisations.

Effects on tangata whenua values
37. The Proposed District Plan does not identify any Sites and Areas of Significance to Maori in the Site, but the nearby Rakahuri/Ashely River identified as SASM-025. This has been scheduled as being
River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species
38. The PWDP has Policy SASM-P8 which is relevant to pre-development processes:
Engagement with rūnanga
Te Ngāi Tūāhuriri Rūnanga and the District Council to encourage engagement with the Rūnanga priorto persons undertaking activities and/or applying for resource consent where the activity has thepotential to adversely affect identified sites or areas of Ngāi Tūāhuriri cultural significance. Where priorengagement with Te Ngāi Tūāhuriri Rūnanga h as not been undertaken by an applicant for an activitythat has the potential to adversely affect an identified site, the District Council will consult with the Rūnanga.
39. The Site is not listed as an archaeological site on the NZ Archaeological Site database.

Landscape and visual effects
40. Rural Lifestyle style development exists on the Site now (a series of 4 ha lots with a dwelling and associated accessory buildings on each). The landscape is dominated by shelter belts, utility buildings, significant trees and planted curtilages around

dwellings many of which are well set back off the roads down RoWs.
41. An ODP will help to achieve an integrated, cohesive and coherent development The proposal will lead to a modification of the landscape of the Site from a predominantly lifestyle block landscape to a denser semi-urban environment dominated by residential building that will, in time, get the benefit of street tree and reserve plantings and landscape treatments around the houses.
42. The visual effects which will arise from a change in the number of vegetative and built elements in the landscape are significant, but not avoidable, if the Site is to contribute to the on-going growth of Rangiora. The change will contribute to a high quality amenity and quality of environment and one that will be entirely consistent with and supportive of the rural lifestyle residential development that has successfully established on the Site.

Well-functioning urban environments
43. The Site adjoins the existing built up urban area of Rangiora. Immediately to the east are existing or developing residential areas.
44. The conversion of the Site from present rural lifestyle uses to low density, high quality residential will continue a pattern of outward expansion of Rangiora. Such a change may not be consistent with the PWDP's identification of a Future Development Overlay for west Rangiora only as far west as Lehmans Road, but on the ground it will look and integrate as part of the urban fabric.
45. It will provide some replacement lower density living areas for the existing LLR zones at north west Rangiora – but at much more appropriate higher density that the LLR D1 standard which is 1-2 hh/ha. There are two such areas, shown on the planning maps below. River Road has an 'urban overlay' and is intended to be intensified to urban densities. The land on the opposite (east) side of Lehmans Road is a 'legacy' rural residential zoning which applies under the Operative District Plan. The landowners have developed the adjoining residential subdivision and wish to develop the land for full urban residential development. Services are in place to support this. The constraint to date has been Map A of the CRPS which does not include the land as a Greenfield Priority Area or Future Development Area, GR zoning of this land is consistent with the NPS-UD.

Figure 9: PWDP as notified – LLRZs shown in light grey. Diagonal stripes – urban growth overlay.
Site outlined in red.
46. Rangiora is growing apace. It is attracting significant interest from new home buyers as people respond to the significant investment in upgraded transport links (Northern Corridor and public transport) and a growing economic base for employment within the District and the City.
47. Rangiora has excellent connectivity to the City, both via the new Northern Corridor, and a nascent cycleway link into the City. There is a very regular bus service every half hour.(the No 1 Blue Line) The standard trip takes 70 minutes, and there is a twice daily weekday morning express service from Rangiora, and seven times weekday express out to Rangiora all via Kaiapoi.
48. The Site will step out the western edge of Rangiora, but as it exists in a peri-urban form now, such a change does not alter how the Site interacts with Rangiora as a whole. It is in many ways a functional part of urban Rangiora now; it's only the Zone boundaries and policy framework that create the sense of it not being part of Rangiora.
49. The Site is convenient to the Rakihura/ Ashley recreation trails, the racecourse, Arlington Park, and the airfield. The town centre is easily accessible.
50. The following assessment of the criteria in the NPS-UD for determining a well-functioning urban environment shows that the proposed rezoning will deliver urban, housing and residential outcomes that meet those criteria. There will be a variety of homes enabled by generous lot sizes. The Site is well-positioned, building as it does on an existing township well-serviced by public transport and cycling options, to provide good accessibility to jobs, community services, and open spaces, as well as mitigating climate change impacts and future natural hazards by being not near the coast and well removed from major rivers.

NPS-UD Policy 1

Planning decisions contribute to well functioning urban environments, which are urban environments that, as a minimum:	**Assessment**

(a) have or enable a variety of homes that: (i) meet the needs, in terms of type, price, and location, of different households; and (ii) enable Māori to express their cultural traditions and norms;	The proposal is to have larger lots supporting predominantly standalone dwellings and associated accessory buildings (including generous sized garaging) in an open landscaped garden setting. This will fill a gap in the range of housing typologies available at Rangiora and contribute to a better functioning urban environment overall at Rangiora. It is not necessary for each individual rezoning proposal to have a wide range of housing typologies, and in some circumstances this may not be appropriate. The rezoning will deliver a premier high amenity urban subdivision with generous sized lots which will complement existing and planned higher density residential development at west Rangiora. There is scope with the relief sought for a mix of residential densities. The appropriateness of this can be considered at the master planning/ODP stage. The Site has the potential to create a unique urban environment in Rangiora. It can follow the example of Palmview based on a lake or Kaiapoi Likes providing a niche housing option in Rangiora and the District meeting a need for residential land not constrained to GRZ standards.
(b) N/A business sectors	
(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and	The Site has access to a collector road and a strategic road providing easy access to key community amenities and facilities. The town is served by a public bus route to the city, and a cycle trail connecting to Kaiapoi and the City. The new West Rangiora Development Area adjoins the Site to the south. The Site will become closer to Rangiora public transport routes as they extend out to service this new growth area over time. The Site is in walking distance to Arlington Park and the Rakahuri/Ashley which contains abundant recreations pace. It is easily accessible to the town centre and within walking distance to the Huntingdon Drive local centre.
(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and	The demand for housing and land in Rangiora is largely ahead of the planning means to respond. This proposal will “top up” the land presently set aside in the PWDP and provide a useful buffer to demand. The Site owners have been keen to release this land for more intense development for some time; there is no prospect of land banking.
(e) support reductions in greenhouse gas emissions; and	The Site has significant advantages in being easily accessible to the town centre and reserves, community facilities and schools. The proposal retains a consolidated form to Rangiora with good connectivity and linkages to recreation space and commercial centres reducing the need for car travel.
(f) are resilient to the likely current and	The Site is within the area of influence of a major river but the non-urban flood assessment maps do not show extensive flooding likely at the Site.

future effects of climate change	Being inland it is not at risk from climate change induced extreme natural hazard events like sea level rise. or river flooding.

Effects on ecosystems and habitats

51. The Site is currently used for a mix of low intensity (grazing) farming, and lifestyle purposes. Shelter belts and utility buildings have been established

52. The Site has been identified in the PWDP with two ecological overlays (the PWDP ecological overlay – Plains and Low Plains Ecological District). They are a district-wide overlays and no specific ecological values have been identified in the Proposed Waimakariri District Plan. These overlays seek primarily to retain indigenous vegetation. The PWDP identifies SASM 025 nearby the Site. That is a Site and Area of Significance to Maori and in SASM - Schedule 1 is identified as *being River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species.*

Effects on natural and physical resources

53. The Site drains in a SE direction towards the newly developing residential area.

54. There will be a degree of site disturbance as part of creating the roading network, and reserves, and as part of curtilage development on each lot.

55. The proposed use for residential activity inevitably leads to loss of some rural productive potential as land owner intentions are not about farming or productive use of the land, but lifestyle use and enjoyment. Built forms and hard surfaces become more dominant.

56. The Site comprises 4ha bocks now and these are not able to be used effectively for productive purposes other than for intensive productions based on tunnel housing and other supported production systems. None exist in the Site now.

57. The Site contains Class 2 and Class 3 soils as defined in the NZ Land Use Inventory (Landcare Research) Land Use Capability classes 1-3 **(Figure 10)**. Productive use of these soils other than for low level purposes i.e. grazing, is not feasible given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production).

Figure 10: Site soils: Site outlined in red; (Canterbury Maps)
Class 2 soils: bright green/Class 3 soils: light green;

Discharges of contaminants into the environment

58. There will be no discharges of contaminants into the environment. Wastewater will discharge to the Council's reticulated system.

59. Stormwater discharges will potentially be to ground given ground conditions or to an approved and consented stormwater management and treatment area which will meet all relevant Council standards.

Risks from natural hazards or hazardous installations

60. The PWDP planning maps show the Site as being within a Non-Urban Flood Assessment Area.

61. The District Plan maps do not identify high flood hazard areas or high coastal flood hazard areas, rather these are identified through the flood assessment certification process. This enables the most up-to-date technical information to be used. However, as a guide, areas that are potentially high hazard can be identified through the Waimakariri District Natural Hazards Interactive Viewer (NH - Introduction).

62. Rules that refer to a Flood Assessment Certificate require a certificate to be obtained from the District Council to determine compliance with the relevant rule. The alternative is to apply for resource consent as set out in the rule.

63. Rule NH-R2 states
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;

64. Assessment of flood risk and consequence can be undertaken at subdivision stage.

65. There will be no hazardous installations proposed on the Site.

Geotechnical assessment
66. The PWDP planning maps show the Site as being “Liquefaction damage is unlikely. Standard investigation procedure outlined in NZS3604 is appropriate”.

Contaminated land
67. A Preliminary Site Investigation can be carried out for the Site at subdivision stage.
68. An enquiry of ECAN has identified that two sites at the northern end of the Site potentially contain some contaminated land, which can be investigated further at subdivision stage **(Appendix 6)**. 315 Lehmans Road is an unverified HAIL site (previous use for clay target shooting) and 317 is registered as containing uninvestigated persistent pesticide bulk storage.

Servicing
69. Proposals for servicing the Site and the effects from such servicing in relation to domestic water supply, wastewater, stormwater, roading, and telecommunications will be required for any subdivision consent.

Economic effects
70. It is anticipated that urban development will generate positive economic effects, both from the investigation/development phase and for the longer run economic activity from householders participating in the local economy.

Climate Change effects
71. An assessment of the effects of the proposed rezoning on climate change is included as part of the assessment of a well-functioning urban environment above.
72. A well-functioning urban area that is designed and serviced in an integrated manner, applying sound urban design principles, will enable a reduction in greenhouse gas emissions compared to unplanned, ad hoc development that does not create compact urban forms located where the services and benefits of existing, established urban areas are not readily accessible.
73. There is a triangle of planning influence that can be brought to bear on reducing greenhouse gas emissions
a) Compact urban form minimising distances between homes and work/play options.
b) Proximity of homes to community facilities, services and amenities and business/work areas.
c) Design and provision of movement corridors and linkages that create opportunities other than for vehicles for getting around.
74. The Site of the proposed rezoning:
a) Helps in retaining a compact urban form to Rangiora.
b) Is easily accessible to the town centre and is located convenient to the recreation resources of the nearby Rakahuri/Ashley River, the airfield and racecourse and Arlington Park.
75. Rangiora has excellent connectivity to the City, both via the Northern Motorway, the new Northern Corridor, a cycle way link to Kaiapoi which is linked to the new north city cycle way along the Northern Corridor and a very regular bus service.

Positive effects
76. The proposed rezoning will provide for the continued growth of Rangiora by managing the development through an ODP. The proposal will provide a buffer to on-going high level demand for lots in Rangiora. It will cater for a specific housing need not found in GRZ Zoned land nor LLRZ land. The proposed rezoning is anticipating a form of development that is a much more efficient use of a qualifying site supporting a well-functioning urban area. It is a positive endorsement of Rangiora as a growth node in the District.
77. The benefits derived from a planned ODP approach include facilitating high levels of connectivity, creating community links to identified focal points. The Site is close to recreation facilities. A coordinated and integrated development will provide a distinctive environmental quality and point of difference to the development.
78. The Site adjoins existing and developing residential development on the western edge of Rangiora.
79. From a community well-being perspective, the provision of additional land for residential growth will continue to support the Council’s investment in community infrastructure by maintaining and facilitating growth rates, increasing the rating base and attracting development contributions.

STATUTORY PLANNING ASSESSMENT
80. Submissions must be assessed under the provisions of the RMA, including Part 2 and Section 32 (Requirements for Preparing Evaluation Reports).

National Policy Statements
National Policy Statement on Urban Development Capacity (NPS-UD)

81. The NPS–UD applies to this proposal as it is directed at Tier 1 urban environments, and Tier 1 local authorities which includes Waimakariri District as part of the Christchurch urban environment that is defined in Table 1 of the NPS, and additionally defined as:

any area of land (regardless of size, and irrespective of local authority or statistical boundaries) that: is, or is intended to be, predominantly urban in character; and is, or is intended to be, part of a housing and labour market of at least 10,000 people.

82. The NPS-UD recognises the national significance of:

a) Having well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future; and

b) Providing sufficient development capacity to meet the different needs of people and communities.

83. The NPS outcomes are to be achieved through objectives that address:

a) Planning decisions improving housing affordability by supporting competitive land and development markets.

b) Regional policy statements and district plans enabling more people to live in areas of urban environments near centres or areas with employment opportunities, area well serviced by public transport or a high demand for housing in the area.

c) Urban environments developing and changing over time in response to diverse and changing needs of people, communities and future generations.

d) Local authority decisions on urban development being integrated with infrastructure planning and are strategic over the medium term and long term.

e) Local authority decisions on urban development are responsive particularly for proposals supplying significant development capacity.

f) New Zealand's urban environments support reductions in greenhouse emissions and are resilient to current and future effects of climate change.

84. The key method to achieve these objectives is by development of a Future Development Strategy (FDS). This will set out how the Councils will provide for sufficient development capacity over the next 30 years to meet expected demand. There is no FDS for the greater Christchurch Urban Area that meets the requirements of the NPS-UD.

85. Work on development capacity completed for the NPS - UDC 2016 by the Greater Christchurch Partnership as an Update of the existing Urban Development Strategy (UDS) – Our Space 2019 confirmed what there was a shortage of feasible development capacity for future housing in Waimakariri District for the medium (next 10 years) and long term (10 to 30 years) periods. That assessment is now out of date as it does not address the requirements of the NPS-UD; and rates of take up of land have exceeded projected rates.

86. One of the key changes in the NPS-UD is that local authority decisions on urban development that affects urban environments are responsive, particularly to proposals that would supply significant additional capacity. It also amends the required methodology for housing and business capacity assessments.

87. The current CRPS does not meet the new NPS-UD requirement in relation to proposals for significant additional capacity. Regional councils are required to include criteria in the RPS to determine what plan changes will be treated for the purposes of Policy 8 as adding significantly to development capacity as soon as practicable. ECAN has yet to respond to this requirement.

88. The NPS-UD has immediate effect, so in the meantime, proposals such as this submission must be assessed in the context of the overall intent and purpose of the NPSUD as articulated in the NPS-UD objectives and policies. This includes that NZ has well-functioning environments; provides sufficient development capacity to meet the different needs of people and communities; planning decisions improve housing affordability to contributing to competitive house and land markets; and RMA plans enable more people to live near major employment areas, where there is existing or planned public transport, and where there is high demand for housing.

89. The NPS-UD is the higher order document and its requirements override those of lower order documents where there is a conflict, including regional and district RMA plans.

90. Key objectives and policies in the NPS-UD are assessed here:

NPS-UD Objective/Policy	**Assessment**
Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	The proposed development will further enable Rangiora to sustain itself as a well-functioning urban environment by consolidating the residential area close to the town centre, and provide residential development close to public transport links and existing community and commercial facilities including Huntingdon Drive local centre. The proposal provides choices in the Rangiora housing market and in doing so

Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.	supports housing affordability. Whilst the proposal is for a premier larger lot urban residential development, it is important that all sectors of the market are catered for. This will be more affordable than forcing those wanting large sections out to the much larger and very limited areas of LLR D1 development, or having to purchase 2-3 sections in a standard residential subdivision. There Site is in multiple ownership and the landowners are working together to achieve the rezoning. It will bring more competition into the market by bringing new entrants into the market.
Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply: the area is in or near a centre zone or other area with many employment opportunities the area is well-serviced by existing or planned public transport there is high demand for housing or for business land in the area, relative to other areas within the urban environment.	The CRPS is due for review in 2024 but in the meantime the existing CRPS is not in accordance with the NPS-UD 2020. The proposed rezoning is on the edge of the District's largest centre, which offers a wide range of community and business services, and employment opportunities. It is expected that a proportion of future residents will commute outside the township, but as the township and associated business areas e.g. at Southbrook, continue to grow, this is expected to become proportionally less. Rangiora is well serviced with public transport, there is scope for future mass transit PP, and there is a high demand for housing at Rangiora. The Site adjoins the new West Rangiora Development Area, to the south. Extensions of public transport to service this growth area will be readily accessible to the Site.
Objective 6: Local authority decisions on urban development that affect urban environments are: integrated with infrastructure planning and funding decisions; and strategic over the medium term and long term; and responsive, particularly in relation to proposals that would supply significant development capacity.	Whilst not currently identified as a future growth area in RMA documents, the Site is well placed at the township edge to be serviced by existing infrastructure. Some upgrades may be required, which will be investigated further with Council prior to the hearing. See Policy 8 below for commentary on proposals which supply significant development capacity
Objective 8: New Zealand's urban environments: support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change	The proposal adjoins the existing built up are of Rangiora, close to public transport links. Its excellent accessibility to Christchurch City, substantially enhanced with the new Northern Motorway extensions, means it is now highly accessible to these nearby major employment areas. Travel distances are relatively short, minimising vehicle miles and the potential for greenhouse gas emissions. There is a cycleway link from into Christchurch City, and regular bus services, including an express route. The Site is inland and not subject to natural hazard risks associated with sea level rise arising from climate change.
Policy 1 – Planning decisions for well-functioning urban environments	Assessed at para 41-50
	The proposed rezoning is anticipated to provide sections that will be available for the short term (up to 3 years) and into the medium term (3-10 years) if adopting a more conservative outlook.

Policy 2 - Sufficient development capacity Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.	The locational and amenity advantages of Rangiora also favour strong ongoing demand. The PWDP UFD-O1 Feasible Development Capacity for residential activities identifies the need for 6300 residential units in the period 2018-2028, and 7100 residential units 2028-2048. These numbers are derived from Chapter 6 CRPS Table 6.1. and are out of date. Data from the Council (November 2021) confirms that there are about 800 vacant lots in Rangiora. Building consents are at about 180/year. That means there is about 4 years vacant land supply. A lead in time of 3-5 years is needed to go from rezone to house build so the Council is facing an unnecessary squeeze on land availability. That will translate in to an upward shift in land and section prices as has been the case at Rolleston. The data suggests that the PWDP will be late to the party to ensure there is at least sufficient development capacity to meet expected demand for housing land over the short term, medium term, and long term. There is a looming, inevitable land supply issue so any proposal to add capacity will push the Council closer to meeting the requirements of the NPS-UD. The proposal is consistent with ensuring there is at least sufficient land supply for housing.
Policy 8 – Responsiveness to plan changes Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is: (a) unanticipated by RMA planning documents; or (b) out-of-sequence with planned land release	The proposed rezoning is not anticipated by RMA documents - it is not a Greenfield Priority or Future Development Area in the CRPS, or a New Development area in the PWDP. A responsive approach to the proposal is required as it meets the Policy 8 criteria for unanticipated zoning. It will contribution to well functioning urban environments and will add significant development capacity. There is no development capacity for the housing typology proposed – so any provision is significant in this context. The development will deliver appx 311 high amenity large lot residential sites at an average density of 1500m2. This will be higher if a mix of densities are proposed, which may be appropriate in some parts of the Site, dependent on master planning work to follow.

91. Adopting the submission to re-zone the land, and enable the proposed development on the submission Site will satisfy the objectives and policies of the NPS-UD.

Proposed National Policy Statement for Highly Productive Land (NPS-HPL)

92. The Government proposed in 2019 a NPS-HPL to prevent the loss of productive land and promote its sustainable management. The overall purpose of the proposed NPS-HPL is to improve the way highly-productive land is managed under the Resource Management Act 1991 (RMA) to:

a) Recognise the full range of values and benefits associated with its use for primary production
b) Maintain its availability for primary production for future generations
c) Protect it from inappropriate subdivision, use, and development.

93. The NPS-HPL is still a proposal and not intended to take effect until after Gazettal. At the date of this submission the NPS-HPL has no effect and no assessment of it is required for the purposes of this submission.

94. The Proposed NPS-HPL interim definition of HPL is land defined as Land Use Capability Class 1-3 soils. A portion of the Site contains Class 2 and 3 soils (see **Figure 10)**. Highly productive use of these soils is not realistic given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production). Its present use as lifestyle blocks, low level grazing and agistment is the more likely long run use of the Site if not rezoned.

95. Objective 3 of the Proposed NPS-HPL specifically refers to highly productive soils being protected by avoiding *"uncoordinated urban expansion on highly productive land that has not been subject to a strategic planning process"*.

The Site was assessed through a strategic planning process (WDDS 2018) and the RRS as a preferred site for LLRZ development, and rejected for a change in zoning on the basis that it may be required for long term urban growth of Rangiora.
96. It is therefore considered that this submission to re-zone the Site is largely in accordance with the Proposed NPS-HPL.

National Planning Standards

97. The National Planning standards prescribe various matters under the RMA so that there is consistency among planning documents most relevantly here in terms of appellations for zones, and the standards applying to these zones.
98. The proposed rezoning adopts the standard zone appellation, in this case LLRZ as contained in the PWDP.
99. The PWDP identifies plan standards for minimum and average net site areas for the respective zones. These are modified for the proposed rezoning as a higher density LLRZ.
100. The higher density LLR zoning is entirely consistent with the NPS purpose for the LLRZ as reproduced below. In this case, the principal constraint to more intensive development is the peri-urban location where a lower density transition to the rural environment is appropriate (particularly noting that the zone boundary is 'mid block' so there is no natural or physical buffer between rural and residential areas); the existing pattern of 4 ha lots with existing substantial homes and gardens; and the fact that the premier large lot subdivision proposed relies on consistency of housing quality and character to be deliver on this vision for the area.

Large lot residential zone

Areas used predominantly for residential activities and buildings such as detached houses on lots larger than those of the Low density residential and General residential zones, and where there are particular landscape characteristics, physical limitations or other constraints to more intensive development.

Low density residential zone

Areas used predominantly for residential activities and buildings consistent with a suburban scale and subdivision pattern, such as one to two storey houses with yards and landscaping, and other compatible activities.[2]

Canterbury Regional Policy Statement 2013 (CRPS)

101. Chapter 6 of the RPS *"provides a resource management framework for the recovery of Greater Christchurch, to enable and support recovery and rebuilding, including restoration and enhancement, for the area through to 2028. Recovery in Greater Christchurch is also supported by the provisions in Chapter 5 notated as 'Entire Region'. The provisions in the remainder of the RPS also apply.3"*
102. An assessment of the proposed rezoning against the relevant CRPS Objectives and Policies is set out in **Appendix 1**. This should be read in the context of the CRPS being overdue for review and that it does not provide a regional response to the NPS-UD. The
need to focus on earthquake recovery has now passed and so many of the directive provisions need to be given appropriate 'weight' in a new national policy environment with a focus on flexible, responsive panning approaches that better provide for people's needs and well-being.
103. That assessment shows that

a) The development proposal achieves the objectives for the location, design and function of new developments (Objective 5.2.1)

b) The traffic effects of the proposal are unlikely to give rise to adverse effects and so achieves CRPS objectives for the strategic land transport network (Policy 5.3.7)

c) The Site falls outside the FDAs shown on Map A of Chapter 6 and in that regard is inconsistent with RPS Policy 6.2.1 clauses 1 to 3.

1. identifies priority areas for urban development within Greater Christchurch;

2. identifies Key Activity Centres which provide a focus for high quality, and, where appropriate, mixed-use development that incorporates the principles of good urban design;

3. avoids urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS

d) The environmental effects assessment outlined above establish that the proposed development is consistent and will not give rise to any concerns with respect to all the matters listed in RPS Policy 6.2.1 clauses 4. to 11. These matters are:

6.2.1 Recovery framework

Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that:

1. As above;

2. As above;

3. As above;

4. protects outstanding natural features and landscapes including those within the Port Hills from inappropriate subdivision, use and development;

5. protects and enhances indigenous biodiversity and public space;
6. maintains or improves the quantity and quality of water in groundwater aquifers and surface waterbodies, and quality of ambient air;
7. maintains the character and amenity of rural areas and settlements;
8. protects people from unacceptable risk from natural hazards and the effects of sea-level rise;
9. integrates strategic and other infrastructure and services with land use development;
10. achieves development that does not adversely affect the efficient operation, use, development, appropriate upgrade, and future planning of strategic infrastructure and freight hubs;
11. optimises use of existing infrastructure; and
12. N/A

e) The proposed rezoning achieves policies relating to:
- Sustainability;
- Integration of transport infrastructure and land use;
- Urban design; and
- Biodiversity, natural hazards, landscape, soils, contaminated land.

104. In terms of the CRPS polices for rural residential developments (Policy 6.3.9) the proposal sits square with all policy matters other than being a location identified in an adopted Rural Residential Strategy; and being at a higher density than provided for under this policy (ie greater than 1-2 hh/ha). As such it has a majority of features entirely consistent with the policy.
105. The CRPS includes housing capacity targets as below

6.2.1a Targets for sufficient, feasible development capacity for housing [inserted in accordance with sections 55(2) and 55(A) of the Resource Management Act 1991, from the National Policy Statement on Urban Development Capacity 2016]
For the period 2018-2048, sufficient, feasible development capacity for housing is enabled in Greater Christchurch in accordance with Table 6.1.
Table 6.1 Targets for housing development capacity in Greater Christchurch, 2018-2048

106. These derive from Our Space, under the requirements of the then NPS-Urban Development Capacity 2016, since replaced by the NPS-UD 2020. The targets (known as bottomlines in the NPS-UD) are to be treated as 'minimums' not 'maximums'.
Policy 6.3.12
enables urban development in the Rangiora and Kaiapoi FDAs (new Development Areas in the PWDP) where needed to meet the medium term targets. This a 'minimum' allocation approach contrary to the NPS-UD. The NPS-UD favours over allocation, including in locations unanticipated by RMA plans, where it will add additional development capacity, can be integrated with infrastructure planning and funding, and will contribute to well functioning urban environments – as is the case the proposed Lehmans LLR D2 zone.
107. The proposed Lehmans LLR D2 zone is consistent with the CRPS except with respect to those parts of the CRPS which are out of step with and do not give effect to the higher order plan, the NPS-UD.

Proposed Waimakariri District Plan
108. An assessment of this proposal against the relevant PWDP Objectives and Policies for urban growth and development as notified on 17 September 2021 is set out in **Appendix 2.**
109. That assessment shows that the proposed rezoning is entirely consistent with the relevant objectives and policies, including as sought to be amended by this submission. Those amendments are to UFD-P3 Identification/location and extension of Large Lot Residential Zone areas; and LLRZ-O1 and LLRZ- P1-5 and reflect the intent and outcomes intended for the proposed LLRZ D2 zone, which is a higher density LLRZ zone than the PWDP LLRZ zone (renamed LLRZ D1 in this submission).

ASSESSMENT AGAINST OTHER PLANNING DOCUMENTS
Our Space 2018-2048 Greater Christchurch Settlement Update (2019)
110. Our Space is a non-statutory document prepared under the Local Government Act. It
"responds to the new Government Policy Statement on Land Transport, which has increased funding for mass public transit schemes, and meets the requirement of the National Policy Statement on Urban Development Capacity (NPS-UDC) 2016 to prepare a
future development strategy…. Specifically, it:
• sets out how targets for housing for the next 30 years will be met, accommodating an additional 150,000 people;
• identifies locations for housing growth, encouraging Central City and suburban centre living while providing for township growth in Rolleston, Rangiora and Kaiapoi;…

• *promotes a compact urban form, which provides for efficient transport and locates development in a manner that takes into account climate change and sea level rise.*[4]*.*

..Underpinning this settlement pattern approach is the vision for a transformation of the transport network that fosters much greater public and active transport usage, and reduced reliance on the private vehicle.

111. Our Space acknowledges that this will require commitment from the Government to invest in the necessary improvements to our transport system, which could include investing in rapid transit services. To date, there has been no successful business case for improved public transportation, including not as a Covid 19 fast track infrastructure project.

112. The Our Space housing capacity targets (Table 3) and Future Development Areas are related to growth of urban areas.

113. Our Space, like the CRPS (and the Operative District Plan) are now out of date, as they do not reflect or give effect to the new requirements of the NPS-UD.

Waimakariri 2048 District Development Strategy (WDDS)

114. The preferred growth directions for Rangiora in the WDDS 2048 (2018) are outlined above (under 'Site') i.e. westwards to Lehmans Road, and otherwise eastwards. However, the Council in its decision on the RRS, recognized west of Lehmmans Road as a potential longer town urban growth area.

115. The WDDS Rangiora Snapshot (pp38-39) -when looking ahead to 2048 proposed that:

a) Rangiora remains the District's largest town
b) 30,000 – estimated population (2048)
c) 12,025 – estimated households
d) 5,025 - new households in Rangiora
e) Continues to accommodate one third of the District's residential growth
f) 167 – estimated annual building consents for new dwellings for the next 30 years
g) 423 hectares of additional feasible residential land required by 2048 (this includes capacity in remaining stages of existing residential developments as well as new greenfield areas inside and outside of the Infrastructure Boundary)
h) Future residential growth directions proposed to the east (predominantly) and west of the current town
i) Opportunities for intensification/regeneration to be identified
j) New growth directions take into account areas of unacceptable natural hazard risk and areas of significant environmental and cultural values
k) New growth areas to connect into existing sewer and water networks
l) Stormwater Levels of Service designed to meet increased performance requirements

116. At the 2018 Census Rangiora had a population of 17,841, and 7314 total dwellings (incl those unoccupied and under construction). Population projections for the District show an average annual change 2018-2020 of 1700 persons. If Rangiora continues to attract a third of all district growth as stated in the WDSS then Rangiora's population in 2021 will be around 18,900.

Mahaanui Iwi Management Plan

117. Part 1 of the PWDP in a section "Mana Whenua" sets out the position with respect to iwi and the review of the district Plan:

a) The District's territorial area sits within the takiwā (territory) of Ngāi Tūāhuriri which is one of eighteen Ngāi Tahu regional papatipu rūnanga, constituted under the ***Te Rūnanga o Ngāi Tahu Act 1996*** *to represent* ***mana whenua*** *interests.*

b) The preparation and change of a district plan must take into account relevant iwi documents. For the District, Ngāi Tahu has set out its resource management values, issues, objectives and policies within the Mahaanui Iwi Management Plan (2013).

c) The Mahaanui Iwi Management Plan identifies objectives, issues and policies for natural resource and environmental management for six pāpatipu rūnanga (including Te Ngāi Tūāhuriri Rūnanga). It seeks to ensure that the taonga and resources of Ngāi

Tahu mana whenua are recognised and protected in the decision-making of statutory agencies. The Mahaanui Iwi Management Plan contains a comprehensive suite of policies and objectives addressing the range of resource management matters of significance to tangata whenua. The District Council shall have regard to the Mahaanui Iwi Management Plan when preparing or changing the District Plan, to the extent its content has a bearing on resource management issues of the District.

118. The Mahaanui Iwi Management Plan (MIMP) 2013 was released on 1 March 2013.

119. The MIMP is a tool for tangata whenua to express their identity as manawhenua and their objectives as kaitiaki, to protect their taonga and resources, and their relationships with these. The MIMP seeks to ensure that these taonga and resources are recognised and protected in the decision-making of agencies with statutory responsibilities to tangata whenua. Importantly it is also a tool

that assists Papatipu Rūnanga representatives to articulate their values, issues and policy into statutory processes.
120. The MIMP includes both general objectives and policies about the management of land, air, and water, and also includes catchment specific objectives and policies.
121. Section 5.3 Wai Maori (pp77-98) contains an extensive discussion about tangata whenua rights and interests in freshwater. It provides a suite of Issues, Objectives and Policies for freshwater
122. Section 5.4 Papatuanuku (pp101-124) sets out the Ngai Tahu Subdivision and Development Guidelines that are to be read along-side objectives relating to:

a) Land use planning and management in the takiwā reflects the principle of Ki Uta Ki Tai. (from the mountains to the sea)

b) Rural and urban land use occurs in a manner that is consistent with land capability, the assimilative capacity of catchments and the limits and availability of water resources.

c) Inappropriate land use practices that have a significant and unacceptable effect on water quality and quantity are discontinued.

d) Ngāi Tahu has a prominent and influential role in urban planning and development.

e) Subdivision and development activities implement low impact, innovative and sustainable solutions to water, stormwater, waste and energy issues.

123. Section 5.5 Tane (pp127-137) includes objectives that focus on:
a) Regional policy, planning and decision making in the takiwā reflects the particular interest of Ngāi Tahu in indigenous biodiversity protection, and the importance of mahinga kai to Ngāi Tahu culture and traditions.
b) The customary right of Ngāi Tahu to engage in mahinga kai activity is recognised, protected and enhanced…
c) Customary use, and therefore mahinga kai, is given effect to as a first order priority for freshwater management in the takiwā.
124. Section 6.4 (pp213-224) addresses issues of particular significance to the lands and waters of the Waimakariri catchment within which the Site lies.
125. Relevant Objectives relating to urban development of land in that catchment include:

a) The natural “energy, vitality and life” of the Waimakariri River as a braided river is protected and restored.

b) The discharge of contaminants to the Waimakariri and its tributaries is eliminated.

c) Water quality and flows in the Waimakariri and its tributaries are improved to enable whānau and the wider community to have places they can go to swim and fish.

d) The mauri and mahinga kai values of the Waimakariri and its tributaries and associated springs, wetlands and lagoons are protected and restored; mō tātou, ā, mō kā uri ā muri ake nei.

126. A key issue relating to subdivision and development is that subdivision and development activities in the lower catchment have the potential to adversely affect Ngāi Tahu values such as waterways, mahinga kai and sites of significance (Issue Wai4).
127. The proposal provides for full urban reticulation of the three waters and is consistent with the objectives and policies contained in Chapters 5.3 and 5.4 of the MIMP. The proposal does not preclude individual land owners from installing rainwater collection and use from roof areas at the time of building development.
128. The proposal has been designed taking into consideration the potential effect of resultant subdivision and development on the rivers and streams that flow into the lowland rivers.
129. Overall it is considered that the proposal will not have adverse impact on the cultural values of iwi as set out within the MIMP.

SECTION 32 ASSESSMENT

130. A Section 32 assessment is contained in **Appendix 3.**
131. In summary, the PWDP zoning and associated rules (RLZ Zone with a minimum lot size for subdivision and a dwelling 4ha) do not meet the needs and aspirations of the current owners.
132. Strategic Council planning documents (specifically the WDDS) have a focus on only meeting urban growth demands within urban environments of existing towns. They favour intensification (15hh/ha) and a strict allocation of capacity by development areas. It is a control and command regime consistent with Map A of Chapter 6 of the CRPS but is out of step with the requirements of the NPS-UD which requires a more flexible, responsive approach, prohibits a hard fixed unmoveable urban/rural boundary.
133. This approach leaves little room for new proposals or proposals that do not sit square with the standard array of GRZ/medium density or SETZ (Settlement Zone). SETZ applies to some of the District’s smaller settlements outside Greater Christchurch.
134. Neither LRZ nor Large Lot Residential (LLRZ) as notified in the PWDP is an efficient use of this block of land located as it is immediately adjoining the urban area of Rangiora, and in a location easily accessible to the town centre by active transport modes as well as car and several district reserves.
135. If this Site is not zoned for LLRZ D2 (minimum average lot size 1500m^2) use to enable residential re-development then it will drive pressure to re-zone elsewhere. That step potentially will not have the significant benefits to Rangiora long term in relation to enabling a well-functioning urban environment that enables people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future. Additionally re-zoning to LLRZ D2 will contribute to providing additional development capacity to meet the different needs of people and communities in a planned manner and consistent with the NPS-UD.
136. The Site can readily be developed to reflect the principles of the Urban Design Protocol with values of character, context, and connectivity.
137. The Section 32 assessment concludes that the proposal to re-zone the Site from LRZ zone to LLRZ D2 Zone (average lot size 1500m$_2$) is the most appropriate method for achieving the objectives of the proposal, than the other alternatives considered.
138. Option 2 identified in the s 32 assessment is consistent with some PWDP policies notwithstanding that it does sit square with the strategic intentions signaled in the WDDS and the PWDP approach to providing for development capacity and urban development.
139. Option 2 identified in the s 32 assessment to re-zone the Site is the most appropriate given:

139. Option 2 identified in the s 32 assessment to re-zone the Site is the most appropriate given:

a) The proposals adopt the PWDP zones, development and activity standards with appropriate amendments. This ensures continuity of the District Plan anticipated environmental outcomes and urban amenity for Rangiora and adjoining residential areas;

b) Will be consistent with and give effect to many of the relevant PWDP objectives and policies;

c) It is a logical extension to the developed and developing residential land adjoining the Site while achieving a compact, efficient urban form that removes pressure on isolated rural land elsewhere around Rangiora.

d) It gives effect to the NPS-UD, specifically Objective 6 c) and Policy 8, delivering significant additional development capacity and contributing to a well functioning urban environment.

e) It is assumed that there will be capacity in the public utilities and the existing road network, including planned upgrades, to accommodate the traffic effects of the redevelopment;

f) The proposed Site specific ODP will provide certainty of the final form and disposition of the re-zoned area including its proposals for reserves, roading, future linkages for pedestrian and vehicular traffic.

140. The re-zoning proposal is considered to be appropriate to achieve the sustainable growth and development of Rangiora.

141. The economic, social and environmental benefits of the proposed rezoning outweigh any potential costs.

142. The overall efficiency and effectiveness of the proposed rezoning (Option 2) is high, in comparison to the alternative options set out in the s 32 Assessment which are low (Options One and Four) or low to moderate (Option Three).

143. The PWDP proposes to release land for development in the new Development Areas at Rangiora and Kaiaipoi through a novel and untested certification process that is not clearly derived from RMA statutory powers, nor Local Government Act 2002 (LGA) authority. This approach is not proposed for the LLR Overlay areas. As the proposed Lehmans Road LLR D2 zone proposed by this submission seeks large lot urban densities, it is anticipated that Council may favour the certification process if it accepts the proposed rezoning. This is opposed – rezoning to LLRZ D2 is sought.

144. Potential difficulties with the proposed certification process are identified and discussed in the Section 32 Assessment. (**Appendix 3)**. In summary, the process is hugely discretionary, does not provide conventional rights to an applicant (eg right of objection/appeal) meaning decisions cannot be challenged, and it is not apparent that the process will be appropriately documented with a transparent record of the decision-making within the certification process. Further uncertainty arises in the practicalities of how to negotiate and manage the staging, funding and building of key infrastructure across a range of Sites, and a risk that land supply is controlled by a limited number of large developers. It is a far less efficient and effective method for delivering land for housing than the Council rezoning the land in the PWDP.

145. The proposed rezoning is considered to be the most appropriate, efficient and effective means of achieving the purpose of the RMA.

CONSULTATION

146. The landowners and their consultants have submitted on the WRRS and the WDDS (**Appendix 4)**.

147. The submissions to re-zone as rural residential or identify the Site as suitable for LLRZ have been rejected as noted above. LLRZ but at higher densities as now proposed is considered to be a more efficient use of the land and better meets market demand. 5000m^2 sites provide more land is needed for a spacious home and garden.

148. The landowners have been consistent in their wish to find a zone and possible land uses better suited to their needs.

CONCLUSION

173 The submission seeks to rezone 58 ha of land adjoining Rangiora from Lifestyle Rural Zone (LRZ) to Large Lot Residential with a specific density standard (LLRZ D1), minimum average lot size 1500m^2.

149. The Site has a long history of rural lifestyle use. It is not significantly restricted by potential natural hazards especially flooding, nor does it have physical limitations for development for residential purposes as it is not liquefaction prone, and has no known geotechnical limitations but does contain an area of LUC 2 soils. It is near a site of significance to iwi (SASM – 025) being the Rakahuri/Ashley River The Site has access to a collector road and is near to a strategic road giving direct access to the town centre and a range of community amenities and facilities.

150. The Site immediately adjoins the urban area of Rangiora, and is well located to join in to Council utility services. It is well suited for conversion to residential use.

151. The Site is not identified within the westward growth direction for Rangiora in the District Development Strategy 2018 nor is

it part of the DEV-WR development area which adopts Lehmans Road as its western boundary. It is in a location that achieves coherent and compact urban form offering ease of access to business services, community facilities, reserves and the primary road network.
152. The proposed rezoning provides for a connected and high amenity residential living environment not presently available under the PWDP while avoiding and/or mitigating any potential adverse effects on the environment. It will provide for continuing high demand for a variety of high quality residential sections aimed at a particular segment of the housing market in an ideal location, easily accessible to the existing town centre services and facilities. It will broaden the range of housing available. As such, it is consistent with the NPS-UD including Objective 6c) and Policy 8, to be responsive to proposals which supply significant development capacity and contribute to a well functioning urban environment.
153. The use of this Site for residential purposes can be a sustainable and efficient use of land and infrastructure. The proposed rezoning better provides for the social, economic, environmental well-being of the landowners and the Rangiora community than continuation of the current low intensity lifestyle land use on 4ha blocks, or a conventional LLRZ residential use.
154. Any potential adverse effects of the implementation of the proposed rezoning can be assessed at subdivision stage but there has been no restriction on servicing the blocks to date. Capacity will need to be confirmed for infrastructure, power and road network. Any future subdivision of the Site will need to confirm water supply and wastewater treatment and disposal options.
155. Rezoning of the site to LLRZ zone is not inconsistent with the policies and objectives of the PWDP, but it is at odds with the dated CRPS approach to provision of urban growth and housing capacity for Greater Christchurch, to the extent that it is not within an FDA created by Change 1 to the CRPS and is not identified as an LLRZ site under the strategic RRS prepared by the Council.
156. As the proposal helps achieve the purpose of the RMA, and has been shown to be consistent with the relevant provisions of the NPS-UD, the submission can be accepted by Waimakariri District Council.

Original Submission

Summary Reasons for the Submission

The reasons for our submission are outlined below.
a) The preferred relief (**the proposed rezoning**) is both appropriate and necessary to achieve sustainable growth and development of Rangiora and the District and meet the requirements of the National Policy Statement for Urban Development 2020 (**NPS-UD**).
b) The Site identified in Figure 1 and at para 1 of the Preferred Relief above is a logical and preferred location that lends itself to a specific type of housing development not provided within the PWDP as a residential option adjoining but outside the existing urban areas. Nowhere is it possible to develop in a comprehensive, coordinated way a low density, high quality residential environment in the District's towns, the Rural Lifestyle Zone or Settlement Zone as a permitted activity.
c) The requirement for 12/15 hh/ha in GRZ zones (the majority of land in urban areas) drives development to modern scale relatively small urban lots best produced as a package across a significant land holding. The GRZ subdivision standards do not provide for the needs of people who seek a generous sized urban lot residential setting. This is a housing sector that is running against the planning tide of intensification but is, nonetheless, a legitimate form of housing in an appropriate setting. The barriers to such development in urban areas requires an appropriate setting/ location in the rural areas but close to or adjoining the urban areas and at a much lower density than is desired or appropriate (the PWDP LLRZ) to meet the housing needs for generous sized urban lot residential living..
d) The PWDP subdivision standards for LLRZ require lots that are very large for those whose primary interest in a rural setting is a form of residential living, not one that requires significant maintenance and management often involving animals or machinery at scale. Conversely, the GRZ subdivision standards do not provide for the needs of people who seek a large lot residential setting
e) The focus in the PWDP is on prescribing a limited range of residential options and tightly controlling and constraining housing choice within those options. Further urban growth is also tightly constrained and controlled around DEV areas around Rangiora and Kaiapoi but for a very specific form of residential development driven off density requirements that do not match the needs of all landowners.
f) The focus in most new District Plans, driven in part by the National Planning standards, is to simplify the range of zones, to standardize lot sizes, to supposedly create efficiency and certainty through ease of administration of the District Plans. This is done by constraining housing and land development choices by lot size, by location, by built standards and the disposition of built/open elements in a site. However, the National Planning standards do provide for large lot urban residential living, a residential living option which has not been taken up the PWDP (due most likely to the restrictive provisions of the CRPS which only prescribe one from of lower density residential living, at a density of 1-2 hh/ha).
g) This planning approach may be a standard approach to resource allocation but it does not provide a flexible, responsive

approach to innovative and new development options. The Government is creating policy settings that on one hand seek intensification in urban areas, while at the same time pushing away from a land allocation model of planning. The PWDP in striving to face both policy directions has a package of measures that are in fact a major barrier in terms or cost, timeframes and certainties for proposals that are not cut from the suite of housing and development options set out by the PWDP. The allocation of land in preferred development areas, it must be said, runs counter to the Government's push, and now its direction, to free up land for development, to encourage innovation in housing (presently with a focus of intensification) and to make available a range of responses to the need to meet the housing needs of people and communities set out in the NPS-UD.

h) While the weight of demand (and the planning response) is around affordable housing, around small lots and dense development that supports investment in public facilities and amenities such as public and active transport, reserves, and commercial services, there is always a wide spectrum of preferences at play in the housing market. The demand for high quality, generous houses set on generous sized parcels of land within high amenity settings is an important and no less relevant housing sector. There is a strong unmet demand, as confirmed by advice from Bayleys real estate (**Appendix 5**) for larger family homes with room for a pool or similar. Purchasers want to be close the amenities of Rangiora and within walking and cycling distance of local schools. They do not want the only available options – a 4 ha lifestyle block or 5000m^2 rural residential site at Mandeville or Ohoka.

i) Interestingly enough for a nation built on the so-called quarter acre paradise, recent policy and planning interest in housing and land development has now seemingly positioned the 1011m^2 section as a luxury item, as the antithesis of providing for community well-being and needs. It is as though the old quarter acre of itself acts against building a sense of community despite being able to be developed in a planned, structured, coordinated or integrated manner. Rather than being a frivolous discretionary item in land development

and housing choice, a well-planned, well located and properly serviced low density residential environment has much to offer urban environments. They can be tactically used to provide shape and edge to urban areas, they can provide a mass of amenity different from (and potentially complementary to), but no less legitimate in urban outcome terms, to conventional GRZ zoned land.

j) In many ways the approach of a district plan to the role and place of the old quarter acre is not dissimilar to the issues faced by comprehensive retirement villages when first proposed. The idea of dense, almost gated and self-contained communities, with multi storey buildings also did not sit well in many district plans. But now they are accepted as an important part of the urban fabric catering to a specific demographic and health demographic. Most plans enable them.

k) Provision for low density residential in an urban setting, or failing that likelihood, in an adjoining rural zone is a fundamental gap in the district plan.

l) The submission seeks to provide for another housing typology not provided in the PWDP and in a location with significant planning merit. The planning case was made out in a detailed submission to the proposed Rural Residential Strategy (**RRS**) for the land identified in this submission to be "reserved" for conventional Rural Residential zoning in the review of the District Plan. That submission was rejected in favour of a decision ascribing an unspecific strategic significance to Lehmans Road as the urban boundary; simply the decision was that rural residential development here would preclude this area as a future urban growth path, even though this was likely to be very long term as the Waimakariri District Development Strategy (WDDS 2018) for the period up to 2048, does not favour urban growth west of Lehmans Road.

Officer Recommendation

Continue to exclude the area west of Lehmans Road and the racecourse land at Rangiora as growth areas as these were originally considered but not included in the draft RRDS as they trigger the key preliminary criteria of: being on the direct edges of a main town outside of the Projected Infrastructure Boundary (PIB) thereby foreclosing more intensive long-term urban development, and…

Panel Recommendation

The panel accepted the officer recommendations to exclude areas on the fringes of Rangiora in the final RRDS due to these having the potential to foreclose more intensive long-term urban development of the town.

m) In light of the above decision on the Waimakariri Rural Residential Strategy, the proposal now is for a form of high amenity low density urban zoning, which whilst in demand is entirely absent from the PWDP. This will be a long term urban form of development. The proposal set out in the submission will achieve a compact, and efficient, urban form on the edge of Rangiora with excellent connectivity by multiple transport modes. It provides for continuous urban development by enabling a built form which can act as a strong zone or urban boundary.

n) The proposed rezoning will accommodate approximately 311 LLRZ lots1 at the proposed amended density standards for LLRZ D2 (average size 1500m^2). It will contribute to a well-functioning urban environment, meeting the NPS-UD Objective 6(c).

o) Any adverse effects on the environment arising from the proposed rezoning will be minimal, if any, and can be adequately mitigated. A high amenity master planned development is proposed.

p) Significant positive effects arise from the proposed rezoning. It will enable the short term housing demand at Rangiora to be met, and can deliver a housing typology for which there is demand, on lots that are not a burden to the landowners (which is the case for 4ha and the very limited areas of LLRZ D1 with a density of 1-2 hh/ha) and for which there is no provision in the PWDP. At present rates of land uptake there is about 4 years vacant land supply in Rangiora. Given it takes 3-5 years to bring land from zoned state to on the market as developed lots, there is some urgency in providing additional capacity. This proposal helps address an anticipated shortfall in residential zoned plan enabled land.
q) There is no additional cost to the Council in re-zoning the Site as there is expected to be capacity in the public utilities and the existing road network, including planned upgrades.
r) Amendments to PWDP objectives and policies may be necessary to provide for a higher density LLRZ, but of themselves will not act against those relating to Strategic Directions Urban Form and Development and Urban Growth. The PWDP approach to zones and
identification of future development land is already out of step with higher order Resource Management Act 1991 (RMA) statutory documents because they do not give effect to the NPS-UD (and are sought to be amended through this submission).
s) The alternatives of retaining Rural Lifestyle or Large Lot Residential zone across the entire Site are not an efficient use of land which immediately adjoins the urban area of Rangiora, and is highly accessible to the town centre by active transport modes as well as car.
t) The proposed rezoning is consistent with and the most appropriate, efficient and effective means of achieving the purpose of the RMA.

The Site
1. The Site is a 58ha block of land ('the Site') accessed from Lehman Road, Rangiora **(Figure 1)**. It is owned by the two submitters and 12 other landowners.

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1 Assumes 20% of land area taken for servicing including roading, reserves and stormwater management if required.

Figure 1: The site (outlined in blue (Google Earth)

2. The Site is surrounded by RLZ land that is used for a mix of lifestyle and conventional farming. To the NE is the Rangiora Eco Holiday Park, and beyond the Park is the Rangiora Racecourse about 300m away from the nearest lot and 1km from the centre of the Site. Land to the south east is GRZ and part of urban Rangiora with newly developing residential land west of West Belt. About 1.9 km to the NW is Rangiora Airfield. About 1km north of the most northern lot is the Ashley River.
3. The southern-most lot in the proposal with the Rangiora Vet Clinic faces, but does not have access to Rangiora-Oxford Road (State Highway 72). This arterial road provides the main road connection in to the centre of the town. The well-established Fernside Rural residential area is about 2.5km west from the junction of Lehmans and Rangiora-Oxford Roads.

Figure 2: the site is a broader context (Site marked red)

4. The Site is not identified as lying within a preferred growth direction for Rangiora in the Waimakariri 2048 District Development Strategy (2018) (**WDDS**) **(Figure 3)**. No land west of Lehmans Road is included in the West Rangiora Development Area (**DEV-WR**) in the PWDP.

Figure 3: Figure 11 WDDS

5. The Council reviewed its strategic approach to the location and provision of Rural Residential land (now zoned LLRZ in the PWDP) in the WDSS. It adopted the position that it would:

a) Explore tools such as cluster development to manage rural character

b) For rural residential development, adopt an approach that has a primary focus on creating new rural residential areas, with a secondary focus on enabling large lot intensification within existing rural residential areas where there is sufficient community support and servicing available

c) Review the Rural Residential Development Plan for the whole District (pg 21 WDDS).

6. Rangiora presently has a population of 17,841 (2018 Census). It grew steadily between 2006 and 2018. Growth of Rangiora since then has continued in step with the district growth which has increased 8.2% between 2018 and 2021 from 61,300 to 66,300 at an annual average of 2.8% from 2018 to 2020 (Statistics NZ Subnational population projections at 30 June 2021: provisional).

2006 (count)	2013 (count)	2018 (count)
12,165	15,069	17,841

Statistics NZ

Population projections at 30 June

PLANNING STATUS OF THE SITE

Chapter 6 of the Canterbury Regional Policy Statement

7. An assessment of the CRPS is set out in **Appendix 1** to this submission.
8. The Site is within the Greater Christchurch area.
9. It was not shown as a Greenfield Priority Area – Residential (GPA) on Map A of the Canterbury Regional Policy Statement (CRPS). The GPA terminates at Lehmans Road.
10. As a result of the Minister for the Environment's decision of 28 May 2021 on Change 1 to Chapter 6, an area largely south of Oxford Road and a finger of land to the north of Oxford Road was included as a Future Development Area (**FDA**) (**Figure 4** orange).

Figure 4: Map A Chapter 6 Regional Policy Statement Greenfield Priority areas
Site location identified with red circle (appx)

11. The FDAs are intended to accommodate the increased demand for new dwellings in that part of Waimakariri District within the Greater Christchurch Urban Area and to respond to the NPS-UD. They do not provide "plan enabled" land as they need to negotiate a rezoning process to confirm their status as land developable for housing and other urban purposes.
12. The proposal for a LLRZ zone with average lot sizes of 1500m2 is inconsistent with the policy approach of Chapter 6 for Greater Christchurch, in that if fits none of the residential living typologies provided for in Chapter 6 and is not in a location identified for urban or rural residential development. It sits 'between' the urban and rural residential densities provided for in the CRPS (minimum 10 hh/ha for urban in Waimakariri, and average 1-2 hh/ha for rural residential). The proposed density is appx. 6.66 hh/ha.
13. Notwithstanding, the proposal meets all the location and other criteria in CRPS Policy 6.3.9 for rural residential development. It is:

- Outside the CIAL noise contours
- Has some sites with restrictions from the take-off and landing vectors for Rangiora Airfield but not such as to impact its operational capacity.
- Is outside the groundwater protection zone
- Is not within the Waimakariri stop bank system
- Has no views of or to the Port Hills
- Has good access for emergency services
- Will not create reverse sensitivity issues with adjoining land uses; Rangiora Racecourse is 500m away.
- Free of significant natural hazards and is a flat site.
- Supports no significant natural values or ecological values.

• Contains no SASMs.
• Can be integrated into or consolidated with the existing urban area of west Rangiora.
• Contains no surface water bodies so there will be no adverse impacts on these.
• The development will be contingent on an ODP to provide integrated design for subdivision and land use, and provide for the long-term maintenance of a high quality high density rural residential character.
• The proposal is not intended as a staged development towards full urban; rather it is intended to provide a unique residential environment that can stand alone and contribute to the urban fabric of Rangiora like Palmview in east Rangiora, or as Kaiapoi Lakes does for Kaiapoi.

14. Overall, the proposal is not consistent with Chapter 6 but that is more a function of its original purpose when formulated in 2013. Notwithstanding that, the submission for a lower density residential focussed, high quality urban environment that attaches to an existing urban area and that promotes a coordinated pattern of development has planning merit.

Operative Waimakariri District Plan

15. The Site is zoned Rural in the Operative Plan. The minimum lot size for subdivision and a dwelling is 4 ha.

Proposed Waimakariri District Plan

16. The Site is zoned Rural Lifestyle Zone **(LRZ) (Figure 4).** The minimum lot size for subdivision and a dwelling in the LRZ is 4 ha.
17. Oxford Road is a strategic road and Lehmans Road is a collector road.

Figure 5: Proposed District Plan Zoning (site outlined in red)

18. The Site is also subject to, or potentially influenced by, a number of Overlays:
a) Rangiora Airfield Take Off Climb and Approach Obstacle Limitation Surface (**Figure 6**)
b) National Grid Transmission Lines (**Figure 6**)
c) Liquefaction: Liquefaction damage is unlikely (**Figure 6**)
d) Non-Urban Flood Assessment Area (**Figure 7**)
e) Geographic areas: Ecological Area – Plains
f) Ecological District – Low Plains

Figure 6: Rangiora Airfield Take-off and Approach vectors (blue dashed lines); Liquefaction damage unlikely (green)Transmission lines (green lines); Site outlined in red

Figure 7: Non-urban flood assessment & Waimakariri Flood Hazard maps
Blue – medium risk, green – low risk, white – very low

DEVELOPMENT PROPOSAL AND PROPOSED REZONING

19. Subdivision of the Site will create approximately 311 LLRZ D2 lots.
20. The key design drivers for the proposal are:
a) A high amenity premier residential zone with large houses on large sites – average 1500m^2, min 1000m$_2$ based on the St Kilda, Hamilton development concept (**Figure 8**).
b) LLRZ D2 standards would enable a lower density zone in the medium term e.g. 10 years to achieve a high quality consistent character subdivision. If developed as an integrated development subject to an ODP subdivision can be staged for to the proposal.
c) Creating strong connections with the immediate neighbourhood by providing a cohesive interconnected roading layout that picks up direct links to the eastern neighbourhood off Lehmans Road and the northern subdivision roading, and carries them into the Site.
d) Creating a high amenity and diverse residential neighbourhood by providing interfaces to roads, reserves and rural environments.
e) Respecting and building on local identity and character of Rangiora by retaining specific vegetation features from the Site, and anchoring the development into the wider landscape.

21. A development concept can provide for sound urban design by:
a) A hierarchy of movement corridors.
b) Prioritisation of walking and cycling.
c) A north-south alignment of street blocks to maximize solar access and provide for efficient use of lots.

d) Block perimeters being kept as small as practicable to aid permeability and higher public amenity.
e) Enabling a range of housing typologies set in high quality landscape and street setting with generous amenity plantings and curtilage.

Figure 8: St Kilda development images (Bayleys)

22. St Kilda, Cambridge is a premier development on the outskirts of Cambridge, centrally located and with easy access to the Waikato Expressway. It was originally part of a small dairy operation which was dissected by the Waikato Expressway, leaving a portion within the Cambridge Town boundary and the larger balance of the property of approximately 80 ha (which became St Kilda) on the Eastern side of the Expressway, left in the Rural Zone.
23. The initial development concepts were for a Rural Residential type development given the Expressway separation of the existing residential development on the Western side of the Cambridge Bypass, however this was not supported by Council and a new concept of larger residential sections of a 1600m² average size was developed and approved – see https://www.stkilda.nz/page/location/

EFFECTS ON THE ENVIRONMENT

Township growth and urban form

24. The Site immediately adjoins the western edge of urban Rangiora.
25. The WDDS indicated a general preference for the direction of urban growth of Rangiora to the east as a way of balancing up the residential areas around the town centre and some growth to the west.
26. The approach of the WDDS was to signal growth options to be confirmed in the District Plan Review:
The broad directions for greenfield residential growth for the District's main towns are set out in Figures 11 to 14. Further work will be carried out to identify and confirm the exact locations and extent of these residential growth areas, together with the intensification opportunities within existing urban areas. These will be enabled through the District Plan Review and other planning tools.
27. The Strategic Planning documents clearly signal active consideration of growth needs and growth directions. The options available to the Council were constrained by the approach of the CRPS as the District Plan has to give effect to the CRPS and cannot be
inconsistent with it. The CRPS took effect in 2013 and is overdue for review.
28. The CRPS tightly holds urban growth to the constraints of Map A Chapter 6 and the identified FDAs which although amended by Plan Change 1 in 2020 does not respond to the directions of the NPS-UD. In any event the approach is focused on the need for housing in full urban residential land, less on other residential development forms.
29. As such the Site falls outside the planning policy framework for urban growth. However, in terms of urban form and on the ground, there is considerable merit and logic to conversion of this existing LRZ land to a new high amenity residential form that can be integrated into the Rangiora urban fabric.
30. The proposal has the potential to anticipate the longer term growth path confirmed by the decisions on the RRS to protect the future growth option of more intensive urban development in this direction. It can set a pathway to further westward expansion on land
that holds few if any physical barriers to land development.
31. The proposal will contribute to the housing needs of Rangiora and in a form and location that does not undermine the long run urban form of Rangiora. Planned growth confirmed in the PWDP is already intended to extend westwards out to Lehmans Road and to keep the town edge squared up providing depth to future development and providing a rational basis for providing movement networks driven off the key roads such as Rangiora-Oxford Roads. The West Rangiora Future Development Area confirms this approach. The Site sits in the next block west of Lehmans Road so is not proposing a disjointed urban form, nor one that is not part of the long term thinking of urban form and growth for Rangiora.

32. A full residential zoning is proposed under LLRZ D2 and will provide a high quality street character, overall amenity and passive surveillance over the street, and will create the correct lighting standards, roading standard, fully formed footpaths and cycleways required for a high quality urban environment.

Neighbourhood and wider community effects

33. The Site is serviced by a collector road and is close to an arterial road. This provides for ease of access and safe and convenient movement to and from the Site. A planned development co-ordinated by an ODP can facilitate within the site

movement corridors and linkages through the Site to provide for walking and cycling.
34. A key positive neighbourhood and community effect will arise from the existing dwellings and their established gardens and plantings that will anchor new development and provide a point of reference for new dwellings. Development will not be on a bare site; it will take place in an existing established part-residential setting. The transition to a low density, high quality premier residential development will start from a favourable position and minimise the apparent extent and nature of the landscape change.
35. The Site is comparatively large (58.4 ha) and has the potential to support a variety of residential building typologies and this will contribute to a mix of households within the development and provide built form variety and interest in the streetscape. Whilst LLR D2 standards are proposed, it may be that part of the Site is suitable for other higher density forms of development, which would be within scope of the alternative relief, and could be considered as part of the master planning process required for preparation of an ODP (ahead of the hearing). The earlier stages of the St Kilda development were for large lot residential, with more clusters of townhouses included as later stages (and a retirement village). A retirement village is unlikely in this case, given the proximity of the Charles Upham Retirement Village.
36. Rangiora is well-positioned to accommodate and service the needs of a fast-growing resident population that will in turn support more business activity, schools, community facilities and community organisations.

Effects on tangata whenua values
37. The Proposed District Plan does not identify any Sites and Areas of Significance to Maori in the Site, but the nearby Rakahuri/Ashely River identified as SASM-025. This has been scheduled as being
River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species
38. The PWDP has Policy SASM-P8 which is relevant to pre-development processes:
Engagement with rūnanga
Te Ngāi Tūāhuriri Rūnanga and the District Council to encourage engagement with the Rūnanga priorto persons undertaking activities and/or applying for resource consent where the activity has thepotential to adversely affect identified sites or areas of Ngāi Tūāhuriri cultural significance. Where priorengagement with Te Ngāi Tūāhuriri Rūnanga h as not been undertaken by an applicant for an activitythat has the potential to adversely affect an identified site, the District Council will consult with the Rūnanga.
39. The Site is not listed as an archaeological site on the NZ Archaeological Site database.

Landscape and visual effects
40. Rural Lifestyle style development exists on the Site now (a series of 4 ha lots with a dwelling and associated accessory buildings on each). The landscape is dominated by shelter belts, utility buildings, significant trees and planted curtilages around dwellings many of which are well set back off the roads down RoWs.
41. An ODP will help to achieve an integrated, cohesive and coherent development The proposal will lead to a modification of the landscape of the Site from a predominantly lifestyle block landscape to a denser semi-urban environment dominated by residential building that will, in time, get the benefit of street tree and reserve plantings and landscape treatments around the houses.
42. The visual effects which will arise from a change in the number of vegetative and built elements in the landscape are significant, but not avoidable, if the Site is to contribute to the on-going growth of Rangiora. The change will contribute to a high quality amenity and quality of environment and one that will be entirely consistent with and supportive of the rural lifestyle residential development that has successfully established on the Site.

Well-functioning urban environments
43. The Site adjoins the existing built up urban area of Rangiora. Immediately to the east are existing or developing residential areas.
44. The conversion of the Site from present rural lifestyle uses to low density, high quality residential will continue a pattern of outward expansion of Rangiora. Such a change may not be consistent with the PWDP's identification of a Future Development Overlay for west Rangiora only as far west as Lehmans Road, but on the ground it will look and integrate as part of the urban fabric.
45. It will provide some replacement lower density living areas for the existing LLR zones at north west Rangiora – but at much more appropriate higher density that the LLR D1 standard which is 1-2 hh/ha. There are two such areas, shown on the planning maps below. River Road has an 'urban overlay' and is intended to be intensified to urban densities. The land on the opposite (east) side of Lehmans Road is a 'legacy' rural residential zoning which applies under the Operative District Plan. The landowners have developed the adjoining residential subdivision and wish to develop the land for full urban residential development. Services are in place to support this. The constraint to date has been Map A of the CRPS which does not include the land as a Greenfield Priority Area or Future Development Area, GR zoning of this land is consistent with the NPS-UD.

Figure 9: PWDP as notified – LLRZs shown in light grey. Diagonal stripes – urban growth overlay.
Site outlined in red.

46. Rangiora is growing apace. It is attracting significant interest from new home buyers as people respond to the significant investment in upgraded transport links (Northern Corridor and public transport) and a growing economic base for employment within the District and the City.

47. Rangiora has excellent connectivity to the City, both via the new Northern Corridor, and a nascent cycleway link into the City. There is a very regular bus service every half hour.(the No 1 Blue Line) The standard trip takes 70 minutes, and there is a twice daily weekday morning express service from Rangiora, and seven times weekday express out to Rangiora all via Kaiapoi.

48. The Site will step out the western edge of Rangiora, but as it exists in a peri-urban form now, such a change does not alter how the Site interacts with Rangiora as a whole. It is in many ways a functional part of urban Rangiora now; it's only the Zone boundaries and policy framework that create the sense of it not being part of Rangiora.

49. The Site is convenient to the Rakihura/ Ashley recreation trails, the racecourse, Arlington Park, and the airfield. The town centre is easily accessible.

50. The following assessment of the criteria in the NPS-UD for determining a well-functioning urban environment shows that the proposed rezoning will deliver urban, housing and residential outcomes that meet those criteria. There will be a variety of homes enabled by generous lot sizes. The Site is well-positioned, building as it does on an existing township well-serviced by public transport and cycling options, to provide good accessibility to jobs, community services, and open spaces, as well as mitigating climate change impacts and future natural hazards by being not near the coast and well removed from major rivers.

NPS-UD Policy 1

Planning decisions contribute to well functioning urban environments, which are urban environments that, as a minimum:	**Assessment**
(a) have or enable a variety of homes that: (i) meet the needs, in terms of type, price, and location, of different households; and (ii) enable Māori to express their cultural traditions and norms;	The proposal is to have larger lots supporting predominantly standalone dwellings and associated accessory buildings (including generous sized garaging) in an open landscaped garden setting. This will fill a gap in the range of housing typologies available at Rangiora and contribute to a better functioning urban environment overall at Rangiora. It is not necessary for each individual rezoning proposal to have a wide range of housing typologies, and in some circumstances this may not be appropriate. The rezoning will deliver a premier high amenity urban subdivision with generous sized lots which will complement existing and planned higher density residential development at west Rangiora. There is scope with the relief sought for a mix of residential densities. The appropriateness of this can be considered at the master planning/ODP stage. The Site has the potential to create a unique urban environment in Rangiora. It can follow the example of Palmview based on a lake or Kaiapoi Likes providing a niche housing option in Rangiora and the District meeting a need for residential land not constrained to GRZ standards.
(b) N/A business sectors	
(c) have good accessibility for all people between housing, jobs, community services,	The Site has access to a collector road and a strategic road providing easy access to key community amenities and facilities. The town is served by a public bus route to the city, and a cycle trail connecting to Kaiapoi and the City. The new West Rangiora Development Area adjoins the Site to the south. The Site will become closer to Rangiora public transport routes as they extend out to service this new growth area over time.

natural spaces, and open spaces, including by way of public or active transport; and	The Site is in walking distance to Arlington Park and the Rakahuri/Ashley which contains abundant recreations pace. It is easily accessible to the town centre and within walking distance to the Huntingdon Drive local centre.
(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and	The demand for housing and land in Rangiora is largely ahead of the planning means to respond. This proposal will "top up" the land presently set aside in the PWDP and provide a useful buffer to demand. The Site owners have been keen to release this land for more intense development for some time; there is no prospect of land banking.
(e) support reductions in greenhouse gas emissions; and	The Site has significant advantages in being easily accessible to the town centre and reserves, community facilities and schools. The proposal retains a consolidated form to Rangiora with good connectivity and linkages to recreation space and commercial centres reducing the need for car travel.
(f) are resilient to the likely current and future effects of climate change	The Site is within the area of influence of a major river but the non-urban flood assessment maps do not show extensive flooding likely at the Site. Being inland it is not at risk from climate change induced extreme natural hazard events like sea level rise. or river flooding.

Effects on ecosystems and habitats

51. The Site is currently used for a mix of low intensity (grazing) farming, and lifestyle purposes. Shelter belts and utility buildings have been established
52. The Site has been identified in the PWDP with two ecological overlays (the PWDP ecological overlay – Plains and Low Plains Ecological District). They are a district-wide overlays and no specific ecological values have been identified in the Proposed Waimakariri District Plan. These overlays seek primarily to retain indigenous vegetation. The PWDP identifies SASM 025 nearby the Site. That is a Site and Area of Significance to Maori and in SASM - Schedule 1 is identified as *being River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species.*

Effects on natural and physical resources

53. The Site drains in a SE direction towards the newly developing residential area.
54. There will be a degree of site disturbance as part of creating the roading network, and reserves, and as part of curtilage development on each lot.
55. The proposed use for residential activity inevitably leads to loss of some rural productive potential as land owner intentions are not about farming or productive use of the land, but lifestyle use and enjoyment. Built forms and hard surfaces become more dominant.
56. The Site comprises 4ha bocks now and these are not able to be used effectively for productive purposes other than for intensive productions based on tunnel housing and other supported production systems. None exist in the Site now.
57. The Site contains Class 2 and Class 3 soils as defined in the NZ Land Use Inventory (Landcare Research) Land Use Capability classes 1-3 **(Figure 10)**. Productive use of these soils other than for low level purposes i.e. grazing, is not feasible given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production).

Figure 10: Site soils: Site outlined in red; (Canterbury Maps)
Class 2 soils: bright green/Class 3 soils: light green;

Discharges of contaminants into the environment
58. There will be no discharges of contaminants into the environment. Wastewater will discharge to the Council's reticulated system.
59. Stormwater discharges will potentially be to ground given ground conditions or to an approved and consented stormwater management and treatment area which will meet all relevant Council standards.

Risks from natural hazards or hazardous installations
60. The PWDP planning maps show the Site as being within a Non-Urban Flood Assessment Area.
61. The District Plan maps do not identify high flood hazard areas or high coastal flood hazard areas, rather these are identified through the flood assessment certification process. This enables the most up-to-date technical information to be used. However, as a guide, areas that are potentially high hazard can be identified through the Waimakariri District Natural Hazards Interactive Viewer (NH - Introduction).
62. Rules that refer to a Flood Assessment Certificate require a certificate to be obtained from the District Council to determine compliance with the relevant rule. The alternative is to apply for resource consent as set out in the rule.

63. Rule NH-R2 states
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;

64. Assessment of flood risk and consequence can be undertaken at subdivision stage.
65. There will be no hazardous installations proposed on the Site.

Geotechnical assessment
66. The PWDP planning maps show the Site as being "Liquefaction damage is unlikely. Standard investigation procedure outlined in NZS3604 is appropriate".

Contaminated land
67. A Preliminary Site Investigation can be carried out for the Site at subdivision stage.
68. An enquiry of ECAN has identified that two sites at the northern end of the Site potentially contain some contaminated land, which can be investigated further at subdivision stage **(Appendix 6)**. 315 Lehmans Road is an unverified HAIL site (previous use for clay target shooting) and 317 is registered as containing uninvestigated persistent pesticide bulk storage.

Servicing
69. Proposals for servicing the Site and the effects from such servicing in relation to domestic water supply, wastewater, stormwater, roading, and telecommunications will be required for any subdivision consent.

Economic effects
70. It is anticipated that urban development will generate positive economic effects, both from the investigation/development phase and for the longer run economic activity from householders participating in the local economy.

Climate Change effects
71. An assessment of the effects of the proposed rezoning on climate change is included as part of the assessment of a well-functioning urban environment above.
72. A well-functioning urban area that is designed and serviced in an integrated manner, applying sound urban design principles, will enable a reduction in greenhouse gas emissions compared to unplanned, ad hoc development that does not create compact urban forms located where the services and benefits of existing, established urban areas are not readily accessible.
73. There is a triangle of planning influence that can be brought to bear on reducing greenhouse gas emissions
a) Compact urban form minimising distances between homes and work/play options.
b) Proximity of homes to community facilities, services and amenities and business/work areas.
c) Design and provision of movement corridors and linkages that create opportunities other than for vehicles for getting

around.
74. The Site of the proposed rezoning:
a) Helps in retaining a compact urban form to Rangiora.
b) Is easily accessible to the town centre and is located convenient to the recreation resources of the nearby Rakahuri/Ashley River, the airfield and racecourse and Arlington Park.
75. Rangiora has excellent connectivity to the City, both via the Northern Motorway, the new Northern Corridor, a cycle way link to Kaiapoi which is linked to the new north city cycle way along the Northern Corridor and a very regular bus service.

Positive effects
76. The proposed rezoning will provide for the continued growth of Rangiora by managing the development through an ODP. The proposal will provide a buffer to on-going high level demand for lots in Rangiora. It will cater for a specific housing need not found in GRZ Zoned land nor LLRZ land. The proposed rezoning is anticipating a form of development that is a much more efficient use of a qualifying site supporting a well-functioning urban area. It is a positive endorsement of Rangiora as a growth node in the District.
77. The benefits derived from a planned ODP approach include facilitating high levels of connectivity, creating community links to identified focal points. The Site is close to recreation facilities. A coordinated and integrated development will provide a distinctive environmental quality and point of difference to the development.
78. The Site adjoins existing and developing residential development on the western edge of Rangiora.
79. From a community well-being perspective, the provision of additional land for residential growth will continue to support the Council's investment in community infrastructure by maintaining and facilitating growth rates, increasing the rating base and attracting development contributions.

STATUTORY PLANNING ASSESSMENT
80. Submissions must be assessed under the provisions of the RMA, including Part 2 and Section 32 (Requirements for Preparing Evaluation Reports).

National Policy Statements
National Policy Statement on Urban Development Capacity (NPS-UD)

81. The NPS–UD applies to this proposal as it is directed at Tier 1 urban environments, and
Tier 1 local authorities which includes Waimakariri District as part of the Christchurch urban environment that is defined in Table 1 of the NPS, and additionally defined as:
any area of land (regardless of size, and irrespective of local authority or statistical boundaries)
that: is, or is intended to be, predominantly urban in character; and is, or is intended to be, part of
a housing and labour market of at least 10,000 people.
82. The NPS-UD recognises the national significance of:
a) Having well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future; and
b) Providing sufficient development capacity to meet the different needs of people and communities.
83. The NPS outcomes are to be achieved through objectives that address:
a) Planning decisions improving housing affordability by supporting competitive land and development markets.
b) Regional policy statements and district plans enabling more people to live in areas of urban environments near centres or areas with employment opportunities, area well serviced by public transport or a high demand for housing in the area.
c) Urban environments developing and changing over time in response to diverse and changing needs of people, communities and future generations.
d) Local authority decisions on urban development being integrated with infrastructure planning and are strategic over the medium term and long term.
e) Local authority decisions on urban development are responsive particularly for proposals supplying significant development capacity.
f) New Zealand's urban environments support reductions in greenhouse emissions and are resilient to current and future effects of climate change.
84. The key method to achieve these objectives is by development of a Future Development Strategy (FDS). This will set out how the Councils will provide for sufficient development capacity over the next 30 years to meet expected demand. There is no FDS for the greater Christchurch Urban Area that meets the requirements of the NPS-UD.
85. Work on development capacity completed for the NPS - UDC 2016 by the Greater Christchurch Partnership as an Update of the existing Urban Development Strategy (UDS) – Our Space 2019 confirmed what there was a shortage of feasible development capacity for future housing in Waimakariri District for the medium (next 10 years) and long term (10 to 30 years) periods. That assessment is now out of date as it does not address the requirements of the NPS-UD; and rates of take up of land have exceeded projected rates.

86. One of the key changes in the NPS-UD is that local authority decisions on urban development that affects urban environments are responsive, particularly to proposals that would supply significant additional capacity. It also amends the required methodology for housing and business capacity assessments.
87. The current CRPS does not meet the new NPS-UD requirement in relation to proposals for significant additional capacity. Regional councils are required to include criteria in the RPS to determine what plan changes will be treated for the purposes of Policy 8 as adding significantly to development capacity as soon as practicable. ECAN has yet to respond to this requirement.
88. The NPS-UD has immediate effect, so in the meantime, proposals such as this submission must be assessed in the context of the overall intent and purpose of the NPSUD as articulated in the NPS-UD objectives and policies. This includes that NZ has well-functioning environments; provides sufficient development capacity to meet the different needs of people and communities; planning decisions improve housing affordability to contributing to competitive house and land markets; and RMA plans enable more people to live near major employment areas, where there is existing or planned public transport, and where there is high demand for housing.
89. The NPS-UD is the higher order document and its requirements override those of lower order documents where there is a conflict, including regional and district RMA plans.
90. Key objectives and policies in the NPS-UD are assessed here:

NPS-UD Objective/Policy	**Assessment**
Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	The proposed development will further enable Rangiora to sustain itself as a well-functioning urban environment by consolidating the residential area close to the town centre, and provide residential development close to public transport links and existing community and commercial facilities including Huntingdon Drive local centre.
Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.	The proposal provides choices in the Rangiora housing market and in doing so supports housing affordability. Whilst the proposal is for a premier larger lot urban residential development, it is important that all sectors of the market are catered for. This will be more affordable than forcing those wanting large sections out to the much larger and very limited areas of LLR D1 development, or having to purchase 2-3 sections in a standard residential subdivision. There Site is in multiple ownership and the landowners are working together to achieve the rezoning. It will bring more competition into the market by bringing new entrants into the market.
Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply: the area is in or near a centre zone or other area with many employment opportunities the area is well-serviced by existing or planned public transport there is high demand for housing or for business land in the area, relative to other areas within the urban environment.	The CRPS is due for review in 2024 but in the meantime the existing CRPS is not in accordance with the NPS-UD 2020. The proposed rezoning is on the edge of the District's largest centre, which offers a wide range of community and business services, and employment opportunities. It is expected that a proportion of future residents will commute outside the township, but as the township and associated business areas e.g. at Southbrook, continue to grow, this is expected to become proportionally less. Rangiora is well serviced with public transport, there is scope for future mass transit PP, and there is a high demand for housing at Rangiora. The Site adjoins the new West Rangiora Development Area, to the south. Extensions of public transport to service this growth area will be readily accessible to the Site.
Objective 6: Local authority decisions on urban development that affect urban environments are: integrated with infrastructure planning and funding decisions; and strategic over the medium term and long term; and responsive,	Whilst not currently identified as a future growth area in RMA documents, the Site is well placed at the township edge to be serviced by existing infrastructure. Some upgrades may be required, which will be investigated further with Council prior to the hearing. See Policy 8 below for commentary on proposals which supply

particularly in relation to proposals that would supply significant development capacity.	significant development capacity
Objective 8: New Zealand's urban environments: support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change	The proposal adjoins the existing built up are of Rangiora, close to public transport links. Its excellent accessibility to Christchurch City, substantially enhanced with the new Northern Motorway extensions, means it is now highly accessible to these nearby major employment areas. Travel distances are relatively short, minimising vehicle miles and the potential for greenhouse gas emissions. There is a cycleway link from into Christchurch City, and regular bus services, including an express route. The Site is inland and not subject to natural hazard risks associated with sea level rise arising from climate change.
Policy 1 – Planning decisions for well-functioning urban environments	Assessed at para 41-50
Policy 2 - Sufficient development capacity Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.	The proposed rezoning is anticipated to provide sections that will be available for the short term (up to 3 years) and into the medium term (3-10 years) if adopting a more conservative outlook. The locational and amenity advantages of Rangiora also favour strong ongoing demand. The PWDP UFD-O1 Feasible Development Capacity for residential activities identifies the need for 6300 residential units in the period 2018-2028, and 7100 residential units 2028-2048. These numbers are derived from Chapter 6 CRPS Table 6.1. and are out of date. Data from the Council (November 2021) confirms that there are about 800 vacant lots in Rangiora. Building consents are at about 180/year. That means there is about 4 years vacant land supply. A lead in time of 3-5 years is needed to go from rezone to house build so the Council is facing an unnecessary squeeze on land availability. That will translate in to an upward shift in land and section prices as has been the case at Rolleston. The data suggests that the PWDP will be late to the party to ensure there is at least sufficient development capacity to meet expected demand for housing land over the short term, medium term, and long term. There is a looming, inevitable land supply issue so any proposal to add capacity will push the Council closer to meeting the requirements of the NPS-UD. The proposal is consistent with ensuring there is at least sufficient land supply for housing.
Policy 8 – Responsiveness to plan changes Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is: (a) unanticipated by RMA planning	The proposed rezoning is not anticipated by RMA documents - it is not a Greenfield Priority or Future Development Area in the CRPS, or a New Development area in the PWDP. A responsive approach to the proposal is required as it meets the Policy 8 criteria for unanticipated zoning. It will contribution to well functioning urban environments and will add significant development capacity. There is no development capacity for the housing typology proposed – so any provision is significant in this context. The development will deliver appx 311 high amenity large lot residential sites at an average density of 1500m2. This will be higher if a mix

documents; or
(b) out-of-sequence with planned land release

of densities are proposed, which may be appropriate in some parts of the Site, dependent on master planning work to follow.

91. Adopting the submission to re-zone the land, and enable the proposed development on the submission Site will satisfy the objectives and policies of the NPS-UD.

Proposed National Policy Statement for Highly Productive Land (NPS-HPL)

92. The Government proposed in 2019 a NPS-HPL to prevent the loss of productive land and promote its sustainable management. The overall purpose of the proposed NPS-HPL is to improve the way highly-productive land is managed under the Resource Management Act 1991 (RMA) to:

a) Recognise the full range of values and benefits associated with its use for primary production
b) Maintain its availability for primary production for future generations
c) Protect it from inappropriate subdivision, use, and development.

93. The NPS-HPL is still a proposal and not intended to take effect until after Gazettal. At the date of this submission the NPS-HPL has no effect and no assessment of it is required for the purposes of this submission.

94. The Proposed NPS-HPL interim definition of HPL is land defined as Land Use Capability Class 1-3 soils. A portion of the Site contains Class 2 and 3 soils (see **Figure 10)**. Highly productive use of these soils is not realistic given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production). Its present use as lifestyle blocks, low level grazing and agistment is the more likely long run use of the Site if not rezoned.

95. Objective 3 of the Proposed NPS-HPL specifically refers to highly productive soils being protected by avoiding *"uncoordinated urban expansion on highly productive land that has not been subject to a strategic planning process"*. The Site was assessed through a strategic planning process (WDDS 2018) and the RRS as a preferred site for LLRZ development, and rejected for a change in zoning on the basis that it may be required for long term urban growth of Rangiora.

96. It is therefore considered that this submission to re-zone the Site is largely in accordance with the Proposed NPS-HPL.

National Planning Standards

97. The National Planning standards prescribe various matters under the RMA so that there is consistency among planning documents most relevantly here in terms of appellations for zones, and the standards applying to these zones.

98. The proposed rezoning adopts the standard zone appellation, in this case LLRZ as contained in the PWDP.

99. The PWDP identifies plan standards for minimum and average net site areas for the respective zones. These are modified for the proposed rezoning as a higher density LLRZ.

100. The higher density LLR zoning is entirely consistent with the NPS purpose for the LLRZ as reproduced below. In this case, the principal constraint to more intensive development is the peri-urban location where a lower density transition to the rural environment is appropriate (particularly noting that the zone boundary is 'mid block' so there is no natural or physical buffer between rural and residential areas); the existing pattern of 4 ha lots with existing substantial homes and gardens; and the fact that the premier large lot subdivision proposed relies on consistency of housing quality and character to be deliver on this vision for the area.

Large lot residential zone

Areas used predominantly for residential activities and buildings such as detached houses on lots larger than those of the Low density residential and General residential zones, and where there are particular landscape characteristics, physical limitations or other constraints to more intensive development.

Low density residential zone

Areas used predominantly for residential activities and buildings consistent with a suburban scale and subdivision pattern, such as one to two storey houses with yards and landscaping, and other compatible activities.[2]

Canterbury Regional Policy Statement 2013 (CRPS)

101. Chapter 6 of the RPS *"provides a resource management framework for the recovery of Greater Christchurch, to enable and support recovery and rebuilding, including restoration and enhancement, for the area through to 2028. Recovery in Greater Christchurch is also supported by the provisions in Chapter 5 notated as 'Entire Region'. The provisions in the remainder of the RPS also apply.3"*

102. An assessment of the proposed rezoning against the relevant CRPS Objectives and Policies is set out in **Appendix 1**. This should be read in the context of the CRPS being overdue for review and that it does not provide a regional response to the NPS-

UD. The
need to focus on earthquake recovery has now passed and so many of the directive provisions need to be given appropriate 'weight' in a new national policy environment with a focus on flexible, responsive panning approaches that better provide for people's needs and well-being.

103. That assessment shows that

a) The development proposal achieves the objectives for the location, design and function of new developments (Objective 5.2.1)

b) The traffic effects of the proposal are unlikely to give rise to adverse effects and so achieves CRPS objectives for the strategic land transport network (Policy 5.3.7)

c) The Site falls outside the FDAs shown on Map A of Chapter 6 and in that regard is inconsistent with RPS Policy 6.2.1 clauses 1 to 3.

1. identifies priority areas for urban development within Greater Christchurch;

2. identifies Key Activity Centres which provide a focus for high quality, and, where appropriate, mixed-use development that incorporates the principles of good urban design;

3. avoids urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS

d) The environmental effects assessment outlined above establish that the proposed development is consistent and will not give rise to any concerns with respect to all the matters listed in RPS Policy 6.2.1 clauses 4. to 11. These matters are:

6.2.1 Recovery framework

Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that:

1. As above;

2. As above;

3. As above;

4. protects outstanding natural features and landscapes including those within the Port Hills from inappropriate subdivision, use and development;

5. protects and enhances indigenous biodiversity and public space;

6. maintains or improves the quantity and quality of water in groundwater aquifers and surface waterbodies, and quality of ambient air;

7. maintains the character and amenity of rural areas and settlements;

8. protects people from unacceptable risk from natural hazards and the effects of sea-level rise;

9. integrates strategic and other infrastructure and services with land use development;

10. achieves development that does not adversely affect the efficient operation, use, development, appropriate upgrade, and future planning of strategic infrastructure and freight hubs;

11. optimises use of existing infrastructure; and

12. N/A

e) The proposed rezoning achieves policies relating to:

- Sustainability;
- Integration of transport infrastructure and land use;
- Urban design; and
- Biodiversity, natural hazards, landscape, soils, contaminated land.

104. In terms of the CRPS polices for rural residential developments (Policy 6.3.9) the proposal sits square with all policy matters other than being a location identified in an adopted Rural Residential Strategy; and being at a higher density than provided for under this policy (ie greater than 1-2 hh/ha). As such it has a majority of features entirely consistent with the policy.

105. The CRPS includes housing capacity targets as below

6.2.1a Targets for sufficient, feasible development capacity for housing [inserted in accordance with sections 55(2) and 55(A) of the Resource Management Act 1991, from the National Policy Statement on Urban Development Capacity 2016]

For the period 2018-2048, sufficient, feasible development capacity for housing is enabled in Greater Christchurch in accordance with Table 6.1.

Table 6.1 Targets for housing development capacity in Greater Christchurch, 2018-2048

106. These derive from Our Space, under the requirements of the then NPS-Urban Development Capacity 2016, since replaced by the NPS-UD 2020. The targets (known as bottomlines in the NPS-UD) are to be treated as 'minimums' not 'maximums'.

Policy 6.3.12
enables urban development in the Rangiora and Kaiapoi FDAs (new Development Areas in the PWDP) where needed to meet the medium term targets. This a 'minimum' allocation approach contrary to the NPS-UD. The NPS-UD favours over allocation, including in locations unanticipated by RMA plans, where it will add additional development capacity, can be integrated with infrastructure planning and funding, and will contribute to well functioning urban environments – as is the case the proposed Lehmans LLR D2 zone.
107. The proposed Lehmans LLR D2 zone is consistent with the CRPS except with respect to those parts of the CRPS which are out of step with and do not give effect to the higher order plan, the NPS-UD.

Proposed Waimakariri District Plan
108. An assessment of this proposal against the relevant PWDP Objectives and Policies for urban growth and development as notified on 17 September 2021 is set out in **Appendix 2.**
109. That assessment shows that the proposed rezoning is entirely consistent with the relevant objectives and policies, including as sought to be amended by this submission. Those amendments are to UFD-P3 Identification/location and extension of Large Lot Residential Zone areas; and LLRZ-O1 and LLRZ- P1-5 and reflect the intent and outcomes intended for the proposed LLRZ D2 zone, which is a higher density LLRZ zone than the PWDP LLRZ zone (renamed LLRZ D1 in this submission).

ASSESSMENT AGAINST OTHER PLANNING DOCUMENTS
Our Space 2018-2048 Greater Christchurch Settlement Update (2019)
110. Our Space is a non-statutory document prepared under the Local Government Act. It
"responds to the new Government Policy Statement on Land Transport, which has increased funding for mass public transit schemes, and meets the requirement of the National Policy Statement on Urban Development Capacity (NPS-UDC) 2016 to prepare a
future development strategy…. Specifically, it:
• sets out how targets for housing for the next 30 years will be met, accommodating an additional 150,000 people;
• identifies locations for housing growth, encouraging Central City and suburban centre living while providing for township growth in Rolleston, Rangiora and Kaiapoi;…
• promotes a compact urban form, which provides for efficient transport and locates development in a manner that takes into account climate change and sea level rise.[4].

..Underpinning this settlement pattern approach is the vision for a transformation of the transport network that fosters much greater public and active transport usage, and reduced reliance on the private vehicle.
111. Our Space acknowledges that this will require commitment from the Government to invest in the necessary improvements to our transport system, which could include investing in rapid transit services. To date, there has been no successful business case for improved public transportation, including not as a Covid 19 fast track infrastructure project.
112. The Our Space housing capacity targets (Table 3) and Future Development Areas are related to growth of urban areas.
113. Our Space, like the CRPS (and the Operative District Plan) are now out of date, as they do not reflect or give effect to the new requirements of the NPS-UD.

Waimakariri 2048 District Development Strategy (WDDS)
114. The preferred growth directions for Rangiora in the WDDS 2048 (2018) are outlined above (under 'Site') i.e. westwards to Lehmans Road, and otherwise eastwards. However, the Council in its decision on the RRS, recognized west of Lehmmans Road as a potential longer town urban growth area.
115. The WDDS Rangiora Snapshot (pp38-39) -when looking ahead to 2048 proposed that:
a) Rangiora remains the District's largest town
b) 30,000 – estimated population (2048)
c) 12,025 – estimated households
d) 5,025 - new households in Rangiora
e) Continues to accommodate one third of the District's residential growth
f) 167 – estimated annual building consents for new dwellings for the next 30 years
g) 423 hectares of additional feasible residential land required by 2048 (this includes capacity in remaining stages of existing residential developments as well as new greenfield areas inside and outside of the Infrastructure Boundary)
h) Future residential growth directions proposed to the east (predominantly) and west of the current town
i) Opportunities for intensification/regeneration to be identified
j) New growth directions take into account areas of unacceptable natural hazard risk and areas of significant environmental and cultural values
k) New growth areas to connect into existing sewer and water networks

l) Stormwater Levels of Service designed to meet increased performance requirements

116. At the 2018 Census Rangiora had a population of 17,841, and 7314 total dwellings (incl those unoccupied and under construction). Population projections for the District show an average annual change 2018-2020 of 1700 persons. If Rangiora continues to attract a third of all district growth as stated in the WDSS then Rangiora's population in 2021 will be around 18,900.

Mahaanui Iwi Management Plan

117. Part 1 of the PWDP in a section "Mana Whenua" sets out the position with respect to iwi and the review of the district Plan:

a) The District's territorial area sits within the takiwā (territory) of Ngāi Tūāhuriri which is one of eighteen Ngāi Tahu regional papatipu rūnanga, constituted under the ***Te Rūnanga o Ngāi Tahu Act 1996*** *to represent* ***mana whenua*** *interests.*

b) The preparation and change of a district plan must take into account relevant iwi documents. For the District, Ngāi Tahu has set out its resource management values, issues, objectives and policies within the Mahaanui Iwi Management Plan (2013).

c) The Mahaanui Iwi Management Plan identifies objectives, issues and policies for natural resource and environmental management for six pāpatipu rūnanga (including Te Ngāi Tūāhuriri Rūnanga). It seeks to ensure that the taonga and resources of Ngāi

Tahu mana whenua are recognised and protected in the decision-making of statutory agencies. The Mahaanui Iwi Management Plan contains a comprehensive suite of policies and objectives addressing the range of resource management matters of significance to tangata whenua. The District Council shall have regard to the Mahaanui Iwi Management Plan when preparing or changing the District Plan, to the extent its content has a bearing on resource management issues of the District.

118. The Mahaanui Iwi Management Plan (MIMP) 2013 was released on 1 March 2013.

119. The MIMP is a tool for tangata whenua to express their identity as manawhenua and their objectives as kaitiaki, to protect their taonga and resources, and their relationships with these. The MIMP seeks to ensure that these taonga and resources are recognised and protected in the decision-making of agencies with statutory responsibilities to tangata whenua. Importantly it is also a tool that assists Papatipu Rūnanga representatives to articulate their values, issues and policy into statutory processes.

120. The MIMP includes both general objectives and policies about the management of land, air, and water, and also includes catchment specific objectives and policies.

121. Section 5.3 Wai Maori (pp77-98) contains an extensive discussion about tangata whenua rights and interests in freshwater. It provides a suite of Issues, Objectives and Policies for freshwater

122. Section 5.4 Papatuanuku (pp101-124) sets out the Ngai Tahu Subdivision and Development Guidelines that are to be read along-side objectives relating to:

a) Land use planning and management in the takiwā reflects the principle of Ki Uta Ki Tai. (from the mountains to the sea)

b) Rural and urban land use occurs in a manner that is consistent with land capability, the assimilative capacity of catchments and the limits and availability of water resources.

c) Inappropriate land use practices that have a significant and unacceptable effect on water quality and quantity are discontinued.

d) Ngāi Tahu has a prominent and influential role in urban planning and development.

e) Subdivision and development activities implement low impact, innovative and sustainable solutions to water, stormwater, waste and energy issues.

123. Section 5.5 Tane (pp127-137) includes objectives that focus on:

a) Regional policy, planning and decision making in the takiwā reflects the particular interest of Ngāi Tahu in indigenous biodiversity protection, and the importance of mahinga kai to Ngāi Tahu culture and traditions.

b) The customary right of Ngāi Tahu to engage in mahinga kai activity is recognised, protected and enhanced…

c) Customary use, and therefore mahinga kai, is given effect to as a first order priority for freshwater management in the takiwā.

124. Section 6.4 (pp213-224) addresses issues of particular significance to the lands and waters of the Waimakariri catchment within which the Site lies.

125. Relevant Objectives relating to urban development of land in that catchment include:

a) The natural "energy, vitality and life" of the Waimakariri River as a braided river is protected and restored.

b) The discharge of contaminants to the Waimakariri and its tributaries is eliminated.

c) Water quality and flows in the Waimakariri and its tributaries are improved to enable whānau and the wider community to have places they can go to swim and fish.

d) The mauri and mahinga kai values of the Waimakariri and its tributaries and associated springs, wetlands and lagoons are protected and restored; mō tātou, ā, mō kā uri ā muri ake nei.

126. A key issue relating to subdivision and development is that subdivision and development activities in the lower catchment

have the potential to adversely affect Ngāi Tahu values such as waterways, mahinga kai and sites of significance (Issue Wai4).
127. The proposal provides for full urban reticulation of the three waters and is consistent with the objectives and policies contained in Chapters 5.3 and 5.4 of the MIMP. The proposal does not preclude individual land owners from installing rainwater collection and use from roof areas at the time of building development.
128. The proposal has been designed taking into consideration the potential effect of resultant subdivision and development on the rivers and streams that flow into the lowland rivers.
129. Overall it is considered that the proposal will not have adverse impact on the cultural values of iwi as set out within the MIMP.

SECTION 32 ASSESSMENT

130. A Section 32 assessment is contained in **Appendix 3.**
131. In summary, the PWDP zoning and associated rules (RLZ Zone with a minimum lot size for subdivision and a dwelling 4ha) do not meet the needs and aspirations of the current owners.
132. Strategic Council planning documents (specifically the WDDS) have a focus on only meeting urban growth demands within urban environments of existing towns. They favour intensification (15hh/ha) and a strict allocation of capacity by development areas. It is a control and command regime consistent with Map A of Chapter 6 of the CRPS but is out of step with the requirements of the NPS-UD which requires a more flexible, responsive approach, prohibits a hard fixed unmoveable urban/rural boundary.
133. This approach leaves little room for new proposals or proposals that do not sit square with the standard array of GRZ/medium density or SETZ (Settlement Zone). SETZ applies to some of the District's smaller settlements outside Greater Christchurch.
134. Neither LRZ nor Large Lot Residential (LLRZ) as notified in the PWDP is an efficient use of this block of land located as it is immediately adjoining the urban area of Rangiora, and in a location easily accessible to the town centre by active transport modes as well as car and several district reserves.
135. If this Site is not zoned for LLRZ D2 (minimum average lot size 1500m^2) use to enable residential re-development then it will drive pressure to re-zone elsewhere. That step potentially will not have the significant benefits to Rangiora long term in relation to enabling a well-functioning urban environment that enables people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future. Additionally re-zoning to LLRZ D2 will contribute to providing additional development capacity to meet the different needs of people and communities in a planned manner and consistent with the NPS-UD.
136. The Site can readily be developed to reflect the principles of the Urban Design Protocol with values of character, context, and connectivity.
137. The Section 32 assessment concludes that the proposal to re-zone the Site from LRZ zone to LLRZ D2 Zone (average lot size 1500m_2) is the most appropriate method for achieving the objectives of the proposal, than the other alternatives considered.
138. Option 2 identified in the s 32 assessment is consistent with some PWDP policies notwithstanding that it does sit square with the strategic intentions signaled in the WDDS and the PWDP approach to providing for development capacity and urban development.
139. Option 2 identified in the s 32 assessment to re-zone the Site is the most appropriate given:
a) The proposals adopt the PWDP zones, development and activity standards with appropriate amendments. This ensures continuity of the District Plan anticipated environmental outcomes and urban amenity for Rangiora and adjoining residential areas;
b) Will be consistent with and give effect to many of the relevant PWDP objectives and policies;
c) It is a logical extension to the developed and developing residential land adjoining the Site while achieving a compact, efficient urban form that removes pressure on isolated rural land elsewhere around Rangiora.
d) It gives effect to the NPS-UD, specifically Objective 6 c) and Policy 8, delivering significant additional development capacity and contributing to a well functioning urban environment.
e) It is assumed that there will be capacity in the public utilities and the existing road network, including planned upgrades, to accommodate the traffic effects of the redevelopment;
f) The proposed Site specific ODP will provide certainty of the final form and disposition of the re-zoned area including its proposals for reserves, roading, future linkages for pedestrian and vehicular traffic.
140. The re-zoning proposal is considered to be appropriate to achieve the sustainable growth and development of Rangiora.
141. The economic, social and environmental benefits of the proposed rezoning outweigh any potential costs.
142. The overall efficiency and effectiveness of the proposed rezoning (Option 2) is high, in comparison to the alternative options set out in the s 32 Assessment which are low (Options One and Four) or low to moderate (Option Three).
143. The PWDP proposes to release land for development in the new Development Areas at Rangiora and Kaiapoi through a novel and untested certification process that is not clearly derived from RMA statutory powers, nor Local Government Act 2002 (LGA) authority. This approach is not proposed for the LLR Overlay areas. As the proposed Lehmans Road LLR D2 zone proposed by this submission seeks large lot urban densities, it is anticipated that Council may favour the certification process if it accepts the proposed rezoning. This is opposed – rezoning to LLRZ D2 is sought.
144. Potential difficulties with the proposed certification process are identified and discussed in the Section 32 Assessment.

(**Appendix 3)**. In summary, the process is hugely discretionary, does not provide conventional rights to an applicant (eg right of objection/appeal) meaning decisions cannot be challenged, and it is not apparent that the process will be appropriately documented with a transparent record of the decision-making within the certification process. Further uncertainty arises in the practicalities of how to negotiate and manage the staging, funding and building of key infrastructure across a range of Sites, and a risk that land supply is controlled by a limited number of large developers. It is a far less efficient and effective method for delivering land for housing than the Council rezoning the land in the PWDP.
145. The proposed rezoning is considered to be the most appropriate, efficient and effective means of achieving the purpose of the RMA.

CONSULTATION
146. The landowners and their consultants have submitted on the WRRS and the WDDS (**Appendix 4)**.
147. The submissions to re-zone as rural residential or identify the Site as suitable for LLRZ have been rejected as noted above. LLRZ but at higher densities as now proposed is considered to be a more efficient use of the land and better meets market demand. 5000m^2 sites provide more land is needed for a spacious home and garden.
148. The landowners have been consistent in their wish to find a zone and possible land uses better suited to their needs.

CONCLUSION

173 The submission seeks to rezone 58 ha of land adjoining Rangiora from Lifestyle Rural Zone (LRZ) to Large Lot Residential with a specific density standard (LLRZ D1), minimum average lot size 1500m^2.
149. The Site has a long history of rural lifestyle use. It is not significantly restricted by potential natural hazards especially flooding, nor does it have physical limitations for development for residential purposes as it is not liquefaction prone, and has no known geotechnical limitations but does contain an area of LUC 2 soils. It is near a site of significance to iwi (SASM – 025) being the Rakahuri/Ashley River The Site has access to a collector road and is near to a strategic road giving direct access to the town centre and a range of community amenities and facilities.
150. The Site immediately adjoins the urban area of Rangiora, and is well located to join in to Council utility services. It is well suited for conversion to residential use.
151. The Site is not identified within the westward growth direction for Rangiora in the District Development Strategy 2018 nor is it part of the DEV-WR development area which adopts Lehmans Road as its western boundary. It is in a location that achieves coherent and compact urban form offering ease of access to business services, community facilities, reserves and the primary road network.
152. The proposed rezoning provides for a connected and high amenity residential living environment not presently available under the PWDP while avoiding and/or mitigating any potential adverse effects on the environment. It will provide for continuing high demand for a variety of high quality residential sections aimed at a particular segment of the housing market in an ideal location, easily accessible to the existing town centre services and facilities. It will broaden the range of housing available. As such, it is consistent with the NPS-UD including Objective 6c) and Policy 8, to be responsive to proposals which supply significant development capacity and contribute to a well functioning urban environment.
153. The use of this Site for residential purposes can be a sustainable and efficient use of land and infrastructure. The proposed rezoning better provides for the social, economic, environmental well-being of the landowners and the Rangiora community than continuation of the current low intensity lifestyle land use on 4ha blocks, or a conventional LLRZ residential use.
154. Any potential adverse effects of the implementation of the proposed rezoning can be assessed at subdivision stage but there has been no restriction on servicing the blocks to date. Capacity will need to be confirmed for infrastructure, power and road network. Any future subdivision of the Site will need to confirm water supply and wastewater treatment and disposal options.
155. Rezoning of the site to LLRZ zone is not inconsistent with the policies and objectives of the PWDP, but it is at odds with the dated CRPS approach to provision of urban growth and housing capacity for Greater Christchurch, to the extent that it is not within an FDA created by Change 1 to the CRPS and is not identified as an LLRZ site under the strategic RRS prepared by the Council.
156. As the proposal helps achieve the purpose of the RMA, and has been shown to be consistent with the relevant provisions of the NPS-UD, the submission can be accepted by Waimakariri District Council.

Original Submission

Summary Reasons for the Submission

The reasons for our submission are outlined below.
a) The preferred relief (**the proposed rezoning**) is both appropriate and necessary to achieve sustainable growth and

development of Rangiora and the District and meet the requirements of the National Policy Statement for Urban Development 2020 (**NPS-UD**).

b) The Site identified in Figure 1 and at para 1 of the Preferred Relief above is a logical and preferred location that lends itself to a specific type of housing development not provided within the PWDP as a residential option adjoining but outside the existing urban areas. Nowhere is it possible to develop in a comprehensive, coordinated way a low density, high quality residential environment in the District's towns, the Rural Lifestyle Zone or Settlement Zone as a permitted activity.

c) The requirement for 12/15 hh/ha in GRZ zones (the majority of land in urban areas) drives development to modern scale relatively small urban lots best produced as a package across a significant land holding. The GRZ subdivision standards do not provide for the needs of people who seek a generous sized urban lot residential setting. This is a housing sector that is running against the planning tide of intensification but is, nonetheless, a legitimate form of housing in an appropriate setting. The barriers to such development in urban areas requires an appropriate setting/ location in the rural areas but close to or adjoining the urban areas and at a much lower density than is desired or appropriate (the PWDP LLRZ) to meet the housing needs for generous sized urban lot residential living..

d) The PWDP subdivision standards for LLRZ require lots that are very large for those whose primary interest in a rural setting is a form of residential living, not one that requires significant maintenance and management often involving animals or machinery at scale. Conversely, the GRZ subdivision standards do not provide for the needs of people who seek a large lot residential setting

e) The focus in the PWDP is on prescribing a limited range of residential options and tightly controlling and constraining housing choice within those options. Further urban growth is also tightly constrained and controlled around DEV areas around Rangiora and Kaiapoi but for a very specific form of residential development driven off density requirements that do not match the needs of all landowners.

f) The focus in most new District Plans, driven in part by the National Planning standards, is to simplify the range of zones, to standardize lot sizes, to supposedly create efficiency and certainty through ease of administration of the District Plans. This is done by constraining housing and land development choices by lot size, by location, by built standards and the disposition of built/open elements in a site. However, the National Planning standards do provide for large lot urban residential living, a residential living option which has not been taken up the PWDP (due most likely to the restrictive provisions of the CRPS which only prescribe one from of lower density residential living, at a density of 1-2 hh/ha).

g) This planning approach may be a standard approach to resource allocation but it does not provide a flexible, responsive approach to innovative and new development options. The Government is creating policy settings that on one hand seek intensification in urban areas, while at the same time pushing away from a land allocation model of planning. The PWDP in striving to face both policy directions has a package of measures that are in fact a major barrier in terms or cost, timeframes and certainties for proposals that are not cut from the suite of housing and development options set out by the PWDP. The allocation of land in preferred development areas, it must be said, runs counter to the Government's push, and now its direction, to free up land for development, to encourage innovation in housing (presently with a focus of intensification) and to make available a range of responses to the need to meet the housing needs of people and communities set out in the NPS-UD.

h) While the weight of demand (and the planning response) is around affordable housing, around small lots and dense development that supports investment in public facilities and amenities such as public and active transport, reserves, and commercial services, there is always a wide spectrum of preferences at play in the housing market. The demand for high quality, generous houses set on generous sized parcels of land within high amenity settings is an important and no less relevant housing sector. There is a strong unmet demand, as confirmed by advice from Bayleys real estate (**Appendix 5**) for larger family homes with room for a pool or similar. Purchasers want to be close the amenities of Rangiora and within walking and cycling distance of local schools. They do not want the only available options – a 4 ha lifestyle block or 5000m^2 rural residential site at Mandeville or Ohoka.

i) Interestingly enough for a nation built on the so-called quarter acre paradise, recent policy and planning interest in housing and land development has now seemingly positioned the 1011m^2 section as a luxury item, as the antithesis of providing for community well-being and needs. It is as though the old quarter acre of itself acts against building a sense of community despite being able to be developed in a planned, structured, coordinated or integrated manner. Rather than being a frivolous discretionary item in land development
and housing choice, a well-planned, well located and properly serviced low density residential environment has much to offer urban environments. They can be tactically used to provide shape and edge to urban areas, they can provide a mass of amenity different from (and potentially complementary to), but no less legitimate in urban outcome terms, to conventional GRZ zoned land.

j) In many ways the approach of a district plan to the role and place of the old quarter acre is not dissimilar to the issues faced by comprehensive retirement villages when first proposed. The idea of dense, almost gated and self-contained communities, with multi storey buildings also did not sit well in many district plans. But now they are accepted as an important part of the urban fabric catering to a specific demographic and health demographic. Most plans enable them.

k) Provision for low density residential in an urban setting, or failing that likelihood, in an adjoining rural zone is a fundamental gap in the district plan.

l) The submission seeks to provide for another housing typology not provided in the PWDP and in a location with significant planning merit. The planning case was made out in a detailed submission to the proposed Rural Residential Strategy (**RRS**) for

the land identified in this submission to be “reserved” for conventional Rural Residential zoning in the review of the District Plan. That submission was rejected in favour of a decision ascribing an unspecific strategic significance to Lehmans Road as the urban boundary; simply the decision was that rural residential development here would preclude this area as a future urban growth path, even though this was likely to be very long term as the Waimakariri District Development Strategy (WDDS 2018) for the period up to 2048, does not favour urban growth west of Lehmans Road.

Officer Recommendation

Continue to exclude the area west of Lehmans Road and the racecourse land at Rangiora as growth areas as these were originally considered but not included in the draft RRDS as they trigger the key preliminary criteria of: being on the direct edges of a main town outside of the Projected Infrastructure Boundary (PIB) thereby foreclosing more intensive long-term urban development, and…

Panel Recommendation

The panel accepted the officer recommendations to exclude areas on the fringes of Rangiora in the final RRDS due to these having the potential to foreclose more intensive long-term urban development of the town.

m) In light of the above decision on the Waimakariri Rural Residential Strategy, the proposal now is for a form of high amenity low density urban zoning, which whilst in demand is entirely absent from the PWDP. This will be a long term urban form of development. The proposal set out in the submission will achieve a compact, and efficient, urban form on the edge of Rangiora with excellent connectivity by multiple transport modes. It provides for continuous urban development by enabling a built form which can act as a strong zone or urban boundary.

n) The proposed rezoning will accommodate approximately 311 LLRZ lots1 at the proposed amended density standards for LLRZ D2 (average size 1500m^2). It will contribute to a well-functioning urban environment, meeting the NPS-UD Objective 6(c).

o) Any adverse effects on the environment arising from the proposed rezoning will be minimal, if any, and can be adequately mitigated. A high amenity master planned development is proposed.

p) Significant positive effects arise from the proposed rezoning. It will enable the short term housing demand at Rangiora to be met, and can deliver a housing typology for which there is demand, on lots that are not a burden to the landowners (which is the case for 4ha and the very limited areas of LLRZ D1 with a density of 1-2 hh/ha) and for which there is no provision in the PWDP. At present rates of land uptake there is about 4 years vacant land supply in Rangiora. Given it takes 3-5 years to bring land from zoned state to on the market as developed lots, there is some urgency in providing additional capacity. This proposal helps address an anticipated shortfall in residential zoned plan enabled land.

q) There is no additional cost to the Council in re-zoning the Site as there is expected to be capacity in the public utilities and the existing road network, including planned upgrades.

r) Amendments to PWDP objectives and policies may be necessary to provide for a higher density LLRZ, but of themselves will not act against those relating to Strategic Directions Urban Form and Development and Urban Growth. The PWDP approach to zones and
identification of future development land is already out of step with higher order Resource Management Act 1991 (RMA) statutory documents because they do not give effect to the NPS-UD (and are sought to be amended through this submission).

s) The alternatives of retaining Rural Lifestyle or Large Lot Residential zone across the entire Site are not an efficient use of land which immediately adjoins the urban area of Rangiora, and is highly accessible to the town centre by active transport modes as well as car.

t) The proposed rezoning is consistent with and the most appropriate, efficient and effective means of achieving the purpose of the RMA.

The Site

1. The Site is a 58ha block of land (‘the Site’) accessed from Lehman Road, Rangiora **(Figure 1)**. It is owned by the two submitters and 12 other landowners.

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1 Assumes 20% of land area taken for servicing including roading, reserves and stormwater management if required.

Figure 1: The site (outlined in blue (Google Earth)

2. The Site is surrounded by RLZ land that is used for a mix of lifestyle and conventional farming. To the NE is the Rangiora Eco Holiday Park, and beyond the Park is the Rangiora Racecourse about 300m away from the nearest lot and 1km from the centre of the Site. Land to the south east is GRZ and part of urban Rangiora with newly developing residential land west of West Belt. About 1.9 km to the NW is Rangiora Airfield. About 1km north of the most northern lot is the Ashley River.
3. The southern-most lot in the proposal with the Rangiora Vet Clinic faces, but does not have access to Rangiora-Oxford Road (State Highway 72). This arterial road provides the main road connection in to the centre of the town. The well-established Fernside Rural residential area is about 2.5km west from the junction of Lehmans and Rangiora-Oxford Roads.

Figure 2: the site is a broader context (Site marked red)

4. The Site is not identified as lying within a preferred growth direction for Rangiora in the Waimakariri 2048 District Development Strategy (2018) (**WDDS**) **(Figure 3)**. No land west of Lehmans Road is included in the West Rangiora Development Area (**DEV-WR**) in the PWDP.

Figure 3: Figure 11 WDDS

5. The Council reviewed its strategic approach to the location and provision of Rural Residential land (now zoned LLRZ in the PWDP) in the WDSS. It adopted the position that it would:

a) Explore tools such as cluster development to manage rural character

b) For rural residential development, adopt an approach that has a primary focus on creating new rural residential areas, with a secondary focus on enabling large lot intensification within existing rural residential areas where there is sufficient community support and servicing available

c) Review the Rural Residential Development Plan for the whole District (pg 21 WDDS).

6. Rangiora presently has a population of 17,841 (2018 Census). It grew steadily between 2006 and 2018. Growth of Rangiora since then has continued in step with the district growth which has increased 8.2% between 2018 and 2021 from 61,300 to 66,300 at an annual average of 2.8% from 2018 to 2020 (Statistics NZ Subnational population projections at 30 June 2021: provisional).

2006 (count)	2013 (count)	2018 (count)
12,165	15,069	17,841

Statistics NZ

Population projections at 30 June

PLANNING STATUS OF THE SITE

Chapter 6 of the Canterbury Regional Policy Statement

7. An assessment of the CRPS is set out in **Appendix 1** to this submission.
8. The Site is within the Greater Christchurch area.
9. It was not shown as a Greenfield Priority Area – Residential (GPA) on Map A of the Canterbury Regional Policy Statement (CRPS). The GPA terminates at Lehmans Road.
10. As a result of the Minister for the Environment's decision of 28 May 2021 on Change 1 to Chapter 6, an area largely south of Oxford Road and a finger of land to the north of Oxford Road was included as a Future Development Area (**FDA**) (**Figure 4** orange).

Figure 4: Map A Chapter 6 Regional Policy Statement Greenfield Priority areas
Site location identified with red circle (appx)

11. The FDAs are intended to accommodate the increased demand for new dwellings in that part of Waimakariri District within the Greater Christchurch Urban Area and to respond to the NPS-UD. They do not provide "plan enabled" land as they need to negotiate a rezoning process to confirm their status as land developable for housing and other urban purposes.
12. The proposal for a LLRZ zone with average lot sizes of 1500m2 is inconsistent with the policy approach of Chapter 6 for Greater Christchurch, in that if fits none of the residential living typologies provided for in Chapter 6 and is not in a location identified for urban or rural residential development. It sits 'between' the urban and rural residential densities provided for in the CRPS (minimum 10 hh/ha for urban in Waimakariri, and average 1-2 hh/ha for rural residential). The proposed density is appx. 6.66 hh/ha.
13. Notwithstanding, the proposal meets all the location and other criteria in CRPS Policy 6.3.9 for rural residential development. It is:

- Outside the CIAL noise contours
- Has some sites with restrictions from the take-off and landing vectors for Rangiora Airfield but not such as to impact its operational capacity.
- Is outside the groundwater protection zone
- Is not within the Waimakariri stop bank system
- Has no views of or to the Port Hills
- Has good access for emergency services
- Will not create reverse sensitivity issues with adjoining land uses; Rangiora Racecourse is 500m away.
- Free of significant natural hazards and is a flat site.
- Supports no significant natural values or ecological values.
- Contains no SASMs.
- Can be integrated into or consolidated with the existing urban area of west Rangiora.
- Contains no surface water bodies so there will be no adverse impacts on these.
- The development will be contingent on an ODP to provide integrated design for subdivision and land use, and provide for the long-term maintenance of a high quality high density rural residential character.
- The proposal is not intended as a staged development towards full urban; rather it is intended to provide a unique residential environment that can stand alone and contribute to the urban fabric of Rangiora like Palmview in east Rangiora, or as Kaiapoi Lakes does for Kaiapoi.

14. Overall, the proposal is not consistent with Chapter 6 but that is more a function of its original purpose when formulated in 2013. Notwithstanding that, the submission for a lower density residential focussed, high quality urban environment that attaches to an existing urban area and that promotes a coordinated pattern of development has planning merit.

Operative Waimakariri District Plan
15. The Site is zoned Rural in the Operative Plan. The minimum lot size for subdivision and a dwelling is 4 ha.
Proposed Waimakariri District Plan
16. The Site is zoned Rural Lifestyle Zone **(LRZ) (Figure 4).** The minimum lot size for subdivision and a dwelling in the LRZ is 4 ha.
17. Oxford Road is a strategic road and Lehmans Road is a collector road.

Figure 5: Proposed District Plan Zoning (site outlined in red)

18. The Site is also subject to, or potentially influenced by, a number of Overlays:
    a) Rangiora Airfield Take Off Climb and Approach Obstacle Limitation Surface (**Figure 6**)
    b) National Grid Transmission Lines (**Figure 6**)
    c) Liquefaction: Liquefaction damage is unlikely (**Figure 6**)
    d) Non-Urban Flood Assessment Area (**Figure 7**)
    e) Geographic areas: Ecological Area – Plains

f) Ecological District – Low Plains

Figure 6: Rangiora Airfield Take-off and Approach vectors (blue dashed lines); Liquefaction damage unlikely (green)Transmission lines (green lines); Site outlined in red

Figure 7: Non-urban flood assessment & Waimakariri Flood Hazard maps
Blue – medium risk, green – low risk, white – very low

DEVELOPMENT PROPOSAL AND PROPOSED REZONING

19. Subdivision of the Site will create approximately 311 LLRZ D2 lots.
20. The key design drivers for the proposal are:

a) A high amenity premier residential zone with large houses on large sites – average 1500m^2, min 1000m$_2$ based on the St Kilda, Hamilton development concept (**Figure 8**).

b) LLRZ D2 standards would enable a lower density zone in the medium term e.g. 10 years to achieve a high quality consistent character subdivision. If developed as an integrated development subject to an ODP subdivision can be staged for to the proposal.

c) Creating strong connections with the immediate neighbourhood by providing a cohesive interconnected roading layout that picks up direct links to the eastern neighbourhood off Lehmans Road and the northern subdivision roading, and carries them into the Site.

d) Creating a high amenity and diverse residential neighbourhood by providing interfaces to roads, reserves and rural environments.

e) Respecting and building on local identity and character of Rangiora by retaining specific vegetation features from the Site, and anchoring the development into the wider landscape.

21. A development concept can provide for sound urban design by:

a) A hierarchy of movement corridors.

b) Prioritisation of walking and cycling.

c) A north-south alignment of street blocks to maximize solar access and provide for efficient use of lots.

d) Block perimeters being kept as small as practicable to aid permeability and higher public amenity.

e) Enabling a range of housing typologies set in high quality landscape and street setting with generous amenity plantings and curtilage.

Figure 8: St Kilda development images (Bayleys)

22. St Kilda, Cambridge is a premier development on the outskirts of Cambridge, centrally located and with easy access to the Waikato Expressway. It was originally part of a small dairy operation which was dissected by the Waikato Expressway, leaving a portion within the Cambridge Town boundary and the larger balance of the property of approximately 80 ha (which became St Kilda) on the Eastern side of the Expressway, left in the Rural Zone.
23. The initial development concepts were for a Rural Residential type development given the Expressway separation of the existing residential development on the Western side of the Cambridge Bypass, however this was not supported by Council and a new concept of larger residential sections of a 1600m² average size was developed and approved – see https://www.stkilda.nz/page/location/

EFFECTS ON THE ENVIRONMENT

Township growth and urban form

24. The Site immediately adjoins the western edge of urban Rangiora.
25. The WDDS indicated a general preference for the direction of urban growth of Rangiora to the east as a way of balancing up the residential areas around the town centre and some growth to the west.
26. The approach of the WDDS was to signal growth options to be confirmed in the District Plan Review:

The broad directions for greenfield residential growth for the District's main towns are set out in Figures 11 to 14. Further work will be carried out to identify and confirm the exact locations and extent of these residential growth areas, together with the intensification opportunities within existing urban areas. These will be enabled through the District Plan Review and other planning tools.

27. The Strategic Planning documents clearly signal active consideration of growth needs and growth directions. The options available to the Council were constrained by the approach of the CRPS as the District Plan has to give effect to the CRPS and cannot be
inconsistent with it. The CRPS took effect in 2013 and is overdue for review.
28. The CRPS tightly holds urban growth to the constraints of Map A Chapter 6 and the identified FDAs which although amended by Plan Change 1 in 2020 does not respond to the directions of the NPS-UD. In any event the approach is focused on the need for housing in full urban residential land, less on other residential development forms.
29. As such the Site falls outside the planning policy framework for urban growth. However, in terms of urban form and on the ground, there is considerable merit and logic to conversion of this existing LRZ land to a new high amenity residential form that can be integrated into the Rangiora urban fabric.
30. The proposal has the potential to anticipate the longer term growth path confirmed by the decisions on the RRS to protect the future growth option of more intensive urban development in this direction. It can set a pathway to further westward expansion on land
that holds few if any physical barriers to land development.
31. The proposal will contribute to the housing needs of Rangiora and in a form and location that does not undermine the long run urban form of Rangiora. Planned growth confirmed in the PWDP is already intended to extend westwards out to Lehmans Road and to keep the town edge squared up providing depth to future development and providing a rational basis for providing movement networks driven off the key roads such as Rangiora-Oxford Roads. The West Rangiora Future Development Area confirms this approach. The Site sits in the next block west of Lehmans Road so is not proposing a disjointed urban form, nor one that is not part of the long term thinking of urban form and growth for Rangiora.

32. A full residential zoning is proposed under LLRZ D2 and will provide a high quality street character, overall amenity and passive surveillance over the street, and will create the correct lighting standards, roading standard, fully formed footpaths and cycleways required for a high quality urban environment.

Neighbourhood and wider community effects
33. The Site is serviced by a collector road and is close to an arterial road. This provides for ease of access and safe and convenient movement to and from the Site. A planned development co-ordinated by an ODP can facilitate within the site movement corridors and linkages through the Site to provide for walking and cycling.
34. A key positive neighbourhood and community effect will arise from the existing dwellings and their established gardens and plantings that will anchor new development and provide a point of reference for new dwellings. Development will not be on a bare site; it will take place in an existing established part-residential setting. The transition to a low density, high quality premier residential development will start from a favourable position and minimise the apparent extent and nature of the landscape change.
35. The Site is comparatively large (58.4 ha) and has the potential to support a variety of residential building typologies and this will contribute to a mix of households within the development and provide built form variety and interest in the streetscape. Whilst LLR D2 standards are proposed, it may be that part of the Site is suitable for other higher density forms of development, which would be within scope of the alternative relief, and could be considered as part of the master planning process required for preparation of an ODP (ahead of the hearing). The earlier stages of the St Kilda development were for large lot residential, with more clusters of townhouses included as later stages (and a retirement village). A retirement village is unlikely in this case, given the proximity of the Charles Upham Retirement Village.
36. Rangiora is well-positioned to accommodate and service the needs of a fast-growing resident population that will in turn support more business activity, schools, community facilities and community organisations.

Effects on tangata whenua values
37. The Proposed District Plan does not identify any Sites and Areas of Significance to Maori in the Site, but the nearby Rakahuri/Ashely River identified as SASM-025. This has been scheduled as being
River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species
38. The PWDP has Policy SASM-P8 which is relevant to pre-development processes:
Engagement with rūnanga
Te Ngāi Tūāhuriri Rūnanga and the District Council to encourage engagement with the Rūnanga priorto persons undertaking activities and/or applying for resource consent where the activity has thepotential to adversely affect identified sites or areas of Ngāi Tūāhuriri cultural significance. Where priorengagement with Te Ngāi Tūāhuriri Rūnanga h as not been undertaken by an applicant for an activitythat has the potential to adversely affect an identified site, the District Council will consult with the Rūnanga.
39. The Site is not listed as an archaeological site on the NZ Archaeological Site database.

Landscape and visual effects
40. Rural Lifestyle style development exists on the Site now (a series of 4 ha lots with a dwelling and associated accessory buildings on each). The landscape is dominated by shelter belts, utility buildings, significant trees and planted curtilages around

dwellings many of which are well set back off the roads down RoWs.
41. An ODP will help to achieve an integrated, cohesive and coherent development The proposal will lead to a modification of the landscape of the Site from a predominantly lifestyle block landscape to a denser semi-urban environment dominated by residential building that will, in time, get the benefit of street tree and reserve plantings and landscape treatments around the houses.
42. The visual effects which will arise from a change in the number of vegetative and built elements in the landscape are significant, but not avoidable, if the Site is to contribute to the on-going growth of Rangiora. The change will contribute to a high quality amenity and quality of environment and one that will be entirely consistent with and supportive of the rural lifestyle residential development that has successfully established on the Site.

Well-functioning urban environments
43. The Site adjoins the existing built up urban area of Rangiora. Immediately to the east are existing or developing residential areas.
44. The conversion of the Site from present rural lifestyle uses to low density, high quality residential will continue a pattern of outward expansion of Rangiora. Such a change may not be consistent with the PWDP's identification of a Future Development Overlay for west Rangiora only as far west as Lehmans Road, but on the ground it will look and integrate as part of the urban fabric.
45. It will provide some replacement lower density living areas for the existing LLR zones at north west Rangiora – but at much more appropriate higher density that the LLR D1 standard which is 1-2 hh/ha. There are two such areas, shown on the planning maps below. River Road has an 'urban overlay' and is intended to be intensified to urban densities. The land on the opposite (east) side of Lehmans Road is a 'legacy' rural residential zoning which applies under the Operative District Plan. The landowners have developed the adjoining residential subdivision and wish to develop the land for full urban residential development. Services are in place to support this. The constraint to date has been Map A of the CRPS which does not include the land as a Greenfield Priority Area or Future Development Area, GR zoning of this land is consistent with the NPS-UD.

Figure 9: PWDP as notified – LLRZs shown in light grey. Diagonal stripes – urban growth overlay.
Site outlined in red.
46. Rangiora is growing apace. It is attracting significant interest from new home buyers as people respond to the significant investment in upgraded transport links (Northern Corridor and public transport) and a growing economic base for employment within the District and the City.
47. Rangiora has excellent connectivity to the City, both via the new Northern Corridor, and a nascent cycleway link into the City. There is a very regular bus service every half hour.(the No 1 Blue Line) The standard trip takes 70 minutes, and there is a twice daily weekday morning express service from Rangiora, and seven times weekday express out to Rangiora all via Kaiapoi.
48. The Site will step out the western edge of Rangiora, but as it exists in a peri-urban form now, such a change does not alter how the Site interacts with Rangiora as a whole. It is in many ways a functional part of urban Rangiora now; it's only the Zone boundaries and policy framework that create the sense of it not being part of Rangiora.
49. The Site is convenient to the Rakihura/ Ashley recreation trails, the racecourse, Arlington Park, and the airfield. The town centre is easily accessible.
50. The following assessment of the criteria in the NPS-UD for determining a well-functioning urban environment shows that the proposed rezoning will deliver urban, housing and residential outcomes that meet those criteria. There will be a variety of homes enabled by generous lot sizes. The Site is well-positioned, building as it does on an existing township well-serviced by public transport and cycling options, to provide good accessibility to jobs, community services, and open spaces, as well as mitigating climate change impacts and future natural hazards by being not near the coast and well removed from major rivers.

NPS-UD Policy 1

Planning decisions contribute to well functioning urban environments, which are urban environments that, as a minimum:	**Assessment**

(a) have or enable a variety of homes that: (i) meet the needs, in terms of type, price, and location, of different households; and (ii) enable Māori to express their cultural traditions and norms;	The proposal is to have larger lots supporting predominantly standalone dwellings and associated accessory buildings (including generous sized garaging) in an open landscaped garden setting. This will fill a gap in the range of housing typologies available at Rangiora and contribute to a better functioning urban environment overall at Rangiora. It is not necessary for each individual rezoning proposal to have a wide range of housing typologies, and in some circumstances this may not be appropriate. The rezoning will deliver a premier high amenity urban subdivision with generous sized lots which will complement existing and planned higher density residential development at west Rangiora. There is scope with the relief sought for a mix of residential densities. The appropriateness of this can be considered at the master planning/ODP stage. The Site has the potential to create a unique urban environment in Rangiora. It can follow the example of Palmview based on a lake or Kaiapoi Likes providing a niche housing option in Rangiora and the District meeting a need for residential land not constrained to GRZ standards.
(b) N/A business sectors	
(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and	The Site has access to a collector road and a strategic road providing easy access to key community amenities and facilities. The town is served by a public bus route to the city, and a cycle trail connecting to Kaiapoi and the City. The new West Rangiora Development Area adjoins the Site to the south. The Site will become closer to Rangiora public transport routes as they extend out to service this new growth area over time. The Site is in walking distance to Arlington Park and the Rakahuri/Ashley which contains abundant recreations pace. It is easily accessible to the town centre and within walking distance to the Huntingdon Drive local centre.
(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and	The demand for housing and land in Rangiora is largely ahead of the planning means to respond. This proposal will “top up” the land presently set aside in the PWDP and provide a useful buffer to demand. The Site owners have been keen to release this land for more intense development for some time; there is no prospect of land banking.
(e) support reductions in greenhouse gas emissions; and	The Site has significant advantages in being easily accessible to the town centre and reserves, community facilities and schools. The proposal retains a consolidated form to Rangiora with good connectivity and linkages to recreation space and commercial centres reducing the need for car travel.
(f) are resilient to the likely current and	The Site is within the area of influence of a major river but the non-urban flood assessment maps do not show extensive flooding likely at the Site.

future effects of climate change	Being inland it is not at risk from climate change induced extreme natural hazard events like sea level rise. or river flooding.

Effects on ecosystems and habitats

51. The Site is currently used for a mix of low intensity (grazing) farming, and lifestyle purposes. Shelter belts and utility buildings have been established

52. The Site has been identified in the PWDP with two ecological overlays (the PWDP ecological overlay – Plains and Low Plains Ecological District). They are a district-wide overlays and no specific ecological values have been identified in the Proposed Waimakariri District Plan. These overlays seek primarily to retain indigenous vegetation. The PWDP identifies SASM 025 nearby the Site. That is a Site and Area of Significance to Maori and in SASM - Schedule 1 is identified as *being River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species.*

Effects on natural and physical resources

53. The Site drains in a SE direction towards the newly developing residential area.

54. There will be a degree of site disturbance as part of creating the roading network, and reserves, and as part of curtilage development on each lot.

55. The proposed use for residential activity inevitably leads to loss of some rural productive potential as land owner intentions are not about farming or productive use of the land, but lifestyle use and enjoyment. Built forms and hard surfaces become more dominant.

56. The Site comprises 4ha bocks now and these are not able to be used effectively for productive purposes other than for intensive productions based on tunnel housing and other supported production systems. None exist in the Site now.

57. The Site contains Class 2 and Class 3 soils as defined in the NZ Land Use Inventory (Landcare Research) Land Use Capability classes 1-3 **(Figure 10)**. Productive use of these soils other than for low level purposes i.e. grazing, is not feasible given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production).

Figure 10: Site soils: Site outlined in red; (Canterbury Maps)
Class 2 soils: bright green/Class 3 soils: light green;

Discharges of contaminants into the environment

58. There will be no discharges of contaminants into the environment. Wastewater will discharge to the Council's reticulated system.

59. Stormwater discharges will potentially be to ground given ground conditions or to an approved and consented stormwater management and treatment area which will meet all relevant Council standards.

Risks from natural hazards or hazardous installations

60. The PWDP planning maps show the Site as being within a Non-Urban Flood Assessment Area.

61. The District Plan maps do not identify high flood hazard areas or high coastal flood hazard areas, rather these are identified through the flood assessment certification process. This enables the most up-to-date technical information to be used. However, as a guide, areas that are potentially high hazard can be identified through the Waimakariri District Natural Hazards Interactive Viewer (NH - Introduction).

62. Rules that refer to a Flood Assessment Certificate require a certificate to be obtained from the District Council to determine compliance with the relevant rule. The alternative is to apply for resource consent as set out in the rule.

63. Rule NH-R2 states
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;

64. Assessment of flood risk and consequence can be undertaken at subdivision stage.

65. There will be no hazardous installations proposed on the Site.

Geotechnical assessment
66. The PWDP planning maps show the Site as being “Liquefaction damage is unlikely. Standard investigation procedure outlined in NZS3604 is appropriate”.

Contaminated land
67. A Preliminary Site Investigation can be carried out for the Site at subdivision stage.
68. An enquiry of ECAN has identified that two sites at the northern end of the Site potentially contain some contaminated land, which can be investigated further at subdivision stage **(Appendix 6)**. 315 Lehmans Road is an unverified HAIL site (previous use for clay target shooting) and 317 is registered as containing uninvestigated persistent pesticide bulk storage.

Servicing
69. Proposals for servicing the Site and the effects from such servicing in relation to domestic water supply, wastewater, stormwater, roading, and telecommunications will be required for any subdivision consent.

Economic effects
70. It is anticipated that urban development will generate positive economic effects, both from the investigation/development phase and for the longer run economic activity from householders participating in the local economy.

Climate Change effects
71. An assessment of the effects of the proposed rezoning on climate change is included as part of the assessment of a well-functioning urban environment above.
72. A well-functioning urban area that is designed and serviced in an integrated manner, applying sound urban design principles, will enable a reduction in greenhouse gas emissions compared to unplanned, ad hoc development that does not create compact urban forms located where the services and benefits of existing, established urban areas are not readily accessible.
73. There is a triangle of planning influence that can be brought to bear on reducing greenhouse gas emissions
a) Compact urban form minimising distances between homes and work/play options.
b) Proximity of homes to community facilities, services and amenities and business/work areas.
c) Design and provision of movement corridors and linkages that create opportunities other than for vehicles for getting around.
74. The Site of the proposed rezoning:
a) Helps in retaining a compact urban form to Rangiora.
b) Is easily accessible to the town centre and is located convenient to the recreation resources of the nearby Rakahuri/Ashley River, the airfield and racecourse and Arlington Park.
75. Rangiora has excellent connectivity to the City, both via the Northern Motorway, the new Northern Corridor, a cycle way link to Kaiapoi which is linked to the new north city cycle way along the Northern Corridor and a very regular bus service.

Positive effects
76. The proposed rezoning will provide for the continued growth of Rangiora by managing the development through an ODP. The proposal will provide a buffer to on-going high level demand for lots in Rangiora. It will cater for a specific housing need not found in GRZ Zoned land nor LLRZ land. The proposed rezoning is anticipating a form of development that is a much more efficient use of a qualifying site supporting a well-functioning urban area. It is a positive endorsement of Rangiora as a growth node in the District.
77. The benefits derived from a planned ODP approach include facilitating high levels of connectivity, creating community links to identified focal points. The Site is close to recreation facilities. A coordinated and integrated development will provide a distinctive environmental quality and point of difference to the development.
78. The Site adjoins existing and developing residential development on the western edge of Rangiora.
79. From a community well-being perspective, the provision of additional land for residential growth will continue to support the Council’s investment in community infrastructure by maintaining and facilitating growth rates, increasing the rating base and attracting development contributions.

STATUTORY PLANNING ASSESSMENT
80. Submissions must be assessed under the provisions of the RMA, including Part 2 and Section 32 (Requirements for Preparing Evaluation Reports).

National Policy Statements
National Policy Statement on Urban Development Capacity (NPS-UD)

81. The NPS–UD applies to this proposal as it is directed at Tier 1 urban environments, and Tier 1 local authorities which includes Waimakariri District as part of the Christchurch urban environment that is defined in Table 1 of the NPS, and additionally defined as:

any area of land (regardless of size, and irrespective of local authority or statistical boundaries) that: is, or is intended to be, predominantly urban in character; and is, or is intended to be, part of a housing and labour market of at least 10,000 people.

82. The NPS-UD recognises the national significance of:

a) Having well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future; and

b) Providing sufficient development capacity to meet the different needs of people and communities.

83. The NPS outcomes are to be achieved through objectives that address:

a) Planning decisions improving housing affordability by supporting competitive land and development markets.

b) Regional policy statements and district plans enabling more people to live in areas of urban environments near centres or areas with employment opportunities, area well serviced by public transport or a high demand for housing in the area.

c) Urban environments developing and changing over time in response to diverse and changing needs of people, communities and future generations.

d) Local authority decisions on urban development being integrated with infrastructure planning and are strategic over the medium term and long term.

e) Local authority decisions on urban development are responsive particularly for proposals supplying significant development capacity.

f) New Zealand's urban environments support reductions in greenhouse emissions and are resilient to current and future effects of climate change.

84. The key method to achieve these objectives is by development of a Future Development Strategy (FDS). This will set out how the Councils will provide for sufficient development capacity over the next 30 years to meet expected demand. There is no FDS for the greater Christchurch Urban Area that meets the requirements of the NPS-UD.

85. Work on development capacity completed for the NPS - UDC 2016 by the Greater Christchurch Partnership as an Update of the existing Urban Development Strategy (UDS) – Our Space 2019 confirmed what there was a shortage of feasible development capacity for future housing in Waimakariri District for the medium (next 10 years) and long term (10 to 30 years) periods. That assessment is now out of date as it does not address the requirements of the NPS-UD; and rates of take up of land have exceeded projected rates.

86. One of the key changes in the NPS-UD is that local authority decisions on urban development that affects urban environments are responsive, particularly to proposals that would supply significant additional capacity. It also amends the required methodology for housing and business capacity assessments.

87. The current CRPS does not meet the new NPS-UD requirement in relation to proposals for significant additional capacity. Regional councils are required to include criteria in the RPS to determine what plan changes will be treated for the purposes of Policy 8 as adding significantly to development capacity as soon as practicable. ECAN has yet to respond to this requirement.

88. The NPS-UD has immediate effect, so in the meantime, proposals such as this submission must be assessed in the context of the overall intent and purpose of the NPSUD as articulated in the NPS-UD objectives and policies. This includes that NZ has well-functioning environments; provides sufficient development capacity to meet the different needs of people and communities; planning decisions improve housing affordability to contributing to competitive house and land markets; and RMA plans enable more people to live near major employment areas, where there is existing or planned public transport, and where there is high demand for housing.

89. The NPS-UD is the higher order document and its requirements override those of lower order documents where there is a conflict, including regional and district RMA plans.

90. Key objectives and policies in the NPS-UD are assessed here:

NPS-UD Objective/Policy	**Assessment**
Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	The proposed development will further enable Rangiora to sustain itself as a well-functioning urban environment by consolidating the residential area close to the town centre, and provide residential development close to public transport links and existing community and commercial facilities including Huntingdon Drive local centre. The proposal provides choices in the Rangiora housing market and in doing so

Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.	supports housing affordability. Whilst the proposal is for a premier larger lot urban residential development, it is important that all sectors of the market are catered for. This will be more affordable than forcing those wanting large sections out to the much larger and very limited areas of LLR D1 development, or having to purchase 2-3 sections in a standard residential subdivision. There Site is in multiple ownership and the landowners are working together to achieve the rezoning. It will bring more competition into the market by bringing new entrants into the market.
Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply: the area is in or near a centre zone or other area with many employment opportunities the area is well-serviced by existing or planned public transport there is high demand for housing or for business land in the area, relative to other areas within the urban environment.	The CRPS is due for review in 2024 but in the meantime the existing CRPS is not in accordance with the NPS-UD 2020. The proposed rezoning is on the edge of the District's largest centre, which offers a wide range of community and business services, and employment opportunities. It is expected that a proportion of future residents will commute outside the township, but as the township and associated business areas e.g. at Southbrook, continue to grow, this is expected to become proportionally less. Rangiora is well serviced with public transport, there is scope for future mass transit PP, and there is a high demand for housing at Rangiora. The Site adjoins the new West Rangiora Development Area, to the south. Extensions of public transport to service this growth area will be readily accessible to the Site.
Objective 6: Local authority decisions on urban development that affect urban environments are: integrated with infrastructure planning and funding decisions; and strategic over the medium term and long term; and responsive, particularly in relation to proposals that would supply significant development capacity.	Whilst not currently identified as a future growth area in RMA documents, the Site is well placed at the township edge to be serviced by existing infrastructure. Some upgrades may be required, which will be investigated further with Council prior to the hearing. See Policy 8 below for commentary on proposals which supply significant development capacity
Objective 8: New Zealand's urban environments: support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change	The proposal adjoins the existing built up are of Rangiora, close to public transport links. Its excellent accessibility to Christchurch City, substantially enhanced with the new Northern Motorway extensions, means it is now highly accessible to these nearby major employment areas. Travel distances are relatively short, minimising vehicle miles and the potential for greenhouse gas emissions. There is a cycleway link from into Christchurch City, and regular bus services, including an express route. The Site is inland and not subject to natural hazard risks associated with sea level rise arising from climate change.
Policy 1 – Planning decisions for well-functioning urban environments	Assessed at para 41-50
	The proposed rezoning is anticipated to provide sections that will be available for the short term (up to 3 years) and into the medium term (3-10 years) if adopting a more conservative outlook.

Policy 2 - Sufficient development capacity Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.	The locational and amenity advantages of Rangiora also favour strong ongoing demand. The PWDP UFD-O1 Feasible Development Capacity for residential activities identifies the need for 6300 residential units in the period 2018-2028, and 7100 residential units 2028-2048. These numbers are derived from Chapter 6 CRPS Table 6.1. and are out of date. Data from the Council (November 2021) confirms that there are about 800 vacant lots in Rangiora. Building consents are at about 180/year. That means there is about 4 years vacant land supply. A lead in time of 3-5 years is needed to go from rezone to house build so the Council is facing an unnecessary squeeze on land availability. That will translate in to an upward shift in land and section prices as has been the case at Rolleston. The data suggests that the PWDP will be late to the party to ensure there is at least sufficient development capacity to meet expected demand for housing land over the short term, medium term, and long term. There is a looming, inevitable land supply issue so any proposal to add capacity will push the Council closer to meeting the requirements of the NPS-UD. The proposal is consistent with ensuring there is at least sufficient land supply for housing.
Policy 8 – Responsiveness to plan changes Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is: (a) unanticipated by RMA planning documents; or (b) out-of-sequence with planned land release	The proposed rezoning is not anticipated by RMA documents - it is not a Greenfield Priority or Future Development Area in the CRPS, or a New Development area in the PWDP. A responsive approach to the proposal is required as it meets the Policy 8 criteria for unanticipated zoning. It will contribution to well functioning urban environments and will add significant development capacity. There is no development capacity for the housing typology proposed – so any provision is significant in this context. The development will deliver appx 311 high amenity large lot residential sites at an average density of 1500m2. This will be higher if a mix of densities are proposed, which may be appropriate in some parts of the Site, dependent on master planning work to follow.

91. Adopting the submission to re-zone the land, and enable the proposed development on the submission Site will satisfy the objectives and policies of the NPS-UD.

Proposed National Policy Statement for Highly Productive Land (NPS-HPL)

92. The Government proposed in 2019 a NPS-HPL to prevent the loss of productive land and promote its sustainable management. The overall purpose of the proposed NPS-HPL is to improve the way highly-productive land is managed under the Resource Management Act 1991 (RMA) to:

a) Recognise the full range of values and benefits associated with its use for primary production
b) Maintain its availability for primary production for future generations
c) Protect it from inappropriate subdivision, use, and development.

93. The NPS-HPL is still a proposal and not intended to take effect until after Gazettal. At the date of this submission the NPS-HPL has no effect and no assessment of it is required for the purposes of this submission.

94. The Proposed NPS-HPL interim definition of HPL is land defined as Land Use Capability Class 1-3 soils. A portion of the Site contains Class 2 and 3 soils (see **Figure 10)**. Highly productive use of these soils is not realistic given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production). Its present use as lifestyle blocks, low level grazing and agistment is the more likely long run use of the Site if not rezoned.

95. Objective 3 of the Proposed NPS-HPL specifically refers to highly productive soils being protected by avoiding *"uncoordinated urban expansion on highly productive land that has not been subject to a strategic planning process"*.

The Site was assessed through a strategic planning process (WDDS 2018) and the RRS as a preferred site for LLRZ development, and rejected for a change in zoning on the basis that it may be required for long term urban growth of Rangiora.
96. It is therefore considered that this submission to re-zone the Site is largely in accordance with the Proposed NPS-HPL.

National Planning Standards

97. The National Planning standards prescribe various matters under the RMA so that there is consistency among planning documents most relevantly here in terms of appellations for zones, and the standards applying to these zones.
98. The proposed rezoning adopts the standard zone appellation, in this case LLRZ as contained in the PWDP.
99. The PWDP identifies plan standards for minimum and average net site areas for the respective zones. These are modified for the proposed rezoning as a higher density LLRZ.
100. The higher density LLR zoning is entirely consistent with the NPS purpose for the LLRZ as reproduced below. In this case, the principal constraint to more intensive development is the peri-urban location where a lower density transition to the rural environment is appropriate (particularly noting that the zone boundary is 'mid block' so there is no natural or physical buffer between rural and residential areas); the existing pattern of 4 ha lots with existing substantial homes and gardens; and the fact that the premier large lot subdivision proposed relies on consistency of housing quality and character to be deliver on this vision for the area.

Large lot residential zone

Areas used predominantly for residential activities and buildings such as detached houses on lots larger than those of the Low density residential and General residential zones, and where there are particular landscape characteristics, physical limitations or other constraints to more intensive development.

Low density residential zone

Areas used predominantly for residential activities and buildings consistent with a suburban scale and subdivision pattern, such as one to two storey houses with yards and landscaping, and other compatible activities.[2]

Canterbury Regional Policy Statement 2013 (CRPS)

101. Chapter 6 of the RPS *"provides a resource management framework for the recovery of Greater Christchurch, to enable and support recovery and rebuilding, including restoration and enhancement, for the area through to 2028. Recovery in Greater Christchurch is also supported by the provisions in Chapter 5 notated as 'Entire Region'. The provisions in the remainder of the RPS also apply.3"*
102. An assessment of the proposed rezoning against the relevant CRPS Objectives and Policies is set out in **Appendix 1**. This should be read in the context of the CRPS being overdue for review and that it does not provide a regional response to the NPS-UD. The
need to focus on earthquake recovery has now passed and so many of the directive provisions need to be given appropriate 'weight' in a new national policy environment with a focus on flexible, responsive panning approaches that better provide for people's needs and well-being.
103. That assessment shows that

a) The development proposal achieves the objectives for the location, design and function of new developments (Objective 5.2.1)

b) The traffic effects of the proposal are unlikely to give rise to adverse effects and so achieves CRPS objectives for the strategic land transport network (Policy 5.3.7)

c) The Site falls outside the FDAs shown on Map A of Chapter 6 and in that regard is inconsistent with RPS Policy 6.2.1 clauses 1 to 3.

1. identifies priority areas for urban development within Greater Christchurch;

2. identifies Key Activity Centres which provide a focus for high quality, and, where appropriate, mixed-use development that incorporates the principles of good urban design;

3. avoids urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS

d) The environmental effects assessment outlined above establish that the proposed development is consistent and will not give rise to any concerns with respect to all the matters listed in RPS Policy 6.2.1 clauses 4. to 11. These matters are:

6.2.1 Recovery framework

Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that:

1. As above;

2. As above;

3. As above;

4. protects outstanding natural features and landscapes including those within the Port Hills from inappropriate subdivision, use and development;

5. protects and enhances indigenous biodiversity and public space;
6. maintains or improves the quantity and quality of water in groundwater aquifers and surface waterbodies, and quality of ambient air;
7. maintains the character and amenity of rural areas and settlements;
8. protects people from unacceptable risk from natural hazards and the effects of sea-level rise;
9. integrates strategic and other infrastructure and services with land use development;
10. achieves development that does not adversely affect the efficient operation, use, development, appropriate upgrade, and future planning of strategic infrastructure and freight hubs;
11. optimises use of existing infrastructure; and
12. N/A

e) The proposed rezoning achieves policies relating to:
- Sustainability;
- Integration of transport infrastructure and land use;
- Urban design; and
- Biodiversity, natural hazards, landscape, soils, contaminated land.

104. In terms of the CRPS polices for rural residential developments (Policy 6.3.9) the proposal sits square with all policy matters other than being a location identified in an adopted Rural Residential Strategy; and being at a higher density than provided for under this policy (ie greater than 1-2 hh/ha). As such it has a majority of features entirely consistent with the policy.
105. The CRPS includes housing capacity targets as below

6.2.1a Targets for sufficient, feasible development capacity for housing [inserted in accordance with sections 55(2) and 55(A) of the Resource Management Act 1991, from the National Policy Statement on Urban Development Capacity 2016]
For the period 2018-2048, sufficient, feasible development capacity for housing is enabled in Greater Christchurch in accordance with Table 6.1.
Table 6.1 Targets for housing development capacity in Greater Christchurch, 2018-2048

106. These derive from Our Space, under the requirements of the then NPS-Urban Development Capacity 2016, since replaced by the NPS-UD 2020. The targets (known as bottomlines in the NPS-UD) are to be treated as 'minimums' not 'maximums'.
Policy 6.3.12
enables urban development in the Rangiora and Kaiapoi FDAs (new Development Areas in the PWDP) where needed to meet the medium term targets. This a 'minimum' allocation approach contrary to the NPS-UD. The NPS-UD favours over allocation, including in locations unanticipated by RMA plans, where it will add additional development capacity, can be integrated with infrastructure planning and funding, and will contribute to well functioning urban environments – as is the case the proposed Lehmans LLR D2 zone.
107. The proposed Lehmans LLR D2 zone is consistent with the CRPS except with respect to those parts of the CRPS which are out of step with and do not give effect to the higher order plan, the NPS-UD.

Proposed Waimakariri District Plan
108. An assessment of this proposal against the relevant PWDP Objectives and Policies for urban growth and development as notified on 17 September 2021 is set out in **Appendix 2.**
109. That assessment shows that the proposed rezoning is entirely consistent with the relevant objectives and policies, including as sought to be amended by this submission. Those amendments are to UFD-P3 Identification/location and extension of Large Lot Residential Zone areas; and LLRZ-O1 and LLRZ- P1-5 and reflect the intent and outcomes intended for the proposed LLRZ D2 zone, which is a higher density LLRZ zone than the PWDP LLRZ zone (renamed LLRZ D1 in this submission).

ASSESSMENT AGAINST OTHER PLANNING DOCUMENTS
Our Space 2018-2048 Greater Christchurch Settlement Update (2019)
110. Our Space is a non-statutory document prepared under the Local Government Act. It
"responds to the new Government Policy Statement on Land Transport, which has increased funding for mass public transit schemes, and meets the requirement of the National Policy Statement on Urban Development Capacity (NPS-UDC) 2016 to prepare a
future development strategy…. Specifically, it:
• sets out how targets for housing for the next 30 years will be met, accommodating an additional 150,000 people;
• identifies locations for housing growth, encouraging Central City and suburban centre living while providing for township growth in Rolleston, Rangiora and Kaiapoi;…

• *promotes a compact urban form, which provides for efficient transport and locates development in a manner that takes into account climate change and sea level rise.[4].*

..Underpinning this settlement pattern approach is the vision for a transformation of the transport network that fosters much greater public and active transport usage, and reduced reliance on the private vehicle.

111. Our Space acknowledges that this will require commitment from the Government to invest in the necessary improvements to our transport system, which could include investing in rapid transit services. To date, there has been no successful business case for improved public transportation, including not as a Covid 19 fast track infrastructure project.

112. The Our Space housing capacity targets (Table 3) and Future Development Areas are related to growth of urban areas.

113. Our Space, like the CRPS (and the Operative District Plan) are now out of date, as they do not reflect or give effect to the new requirements of the NPS-UD.

Waimakariri 2048 District Development Strategy (WDDS)

114. The preferred growth directions for Rangiora in the WDDS 2048 (2018) are outlined above (under 'Site') i.e. westwards to Lehmans Road, and otherwise eastwards. However, the Council in its decision on the RRS, recognized west of Lehmmans Road as a potential longer town urban growth area.

115. The WDDS Rangiora Snapshot (pp38-39) -when looking ahead to 2048 proposed that:

a) Rangiora remains the District's largest town
b) 30,000 – estimated population (2048)
c) 12,025 – estimated households
d) 5,025 - new households in Rangiora
e) Continues to accommodate one third of the District's residential growth
f) 167 – estimated annual building consents for new dwellings for the next 30 years
g) 423 hectares of additional feasible residential land required by 2048 (this includes capacity in remaining stages of existing residential developments as well as new greenfield areas inside and outside of the Infrastructure Boundary)
h) Future residential growth directions proposed to the east (predominantly) and west of the current town
i) Opportunities for intensification/regeneration to be identified
j) New growth directions take into account areas of unacceptable natural hazard risk and areas of significant environmental and cultural values
k) New growth areas to connect into existing sewer and water networks
l) Stormwater Levels of Service designed to meet increased performance requirements

116. At the 2018 Census Rangiora had a population of 17,841, and 7314 total dwellings (incl those unoccupied and under construction). Population projections for the District show an average annual change 2018-2020 of 1700 persons. If Rangiora continues to attract a third of all district growth as stated in the WDSS then Rangiora's population in 2021 will be around 18,900.

Mahaanui Iwi Management Plan

117. Part 1 of the PWDP in a section "Mana Whenua" sets out the position with respect to iwi and the review of the district Plan:

a) The District's territorial area sits within the takiwā (territory) of Ngāi Tūāhuriri which is one of eighteen Ngāi Tahu regional papatipu rūnanga, constituted under the ***Te Rūnanga o Ngāi Tahu Act 1996*** *to represent* ***mana whenua*** *interests.*

b) The preparation and change of a district plan must take into account relevant iwi documents. For the District, Ngāi Tahu has set out its resource management values, issues, objectives and policies within the Mahaanui Iwi Management Plan (2013).

c) The Mahaanui Iwi Management Plan identifies objectives, issues and policies for natural resource and environmental management for six pāpatipu rūnanga (including Te Ngāi Tūāhuriri Rūnanga). It seeks to ensure that the taonga and resources of Ngāi

Tahu mana whenua are recognised and protected in the decision-making of statutory agencies. The Mahaanui Iwi Management Plan contains a comprehensive suite of policies and objectives addressing the range of resource management matters of significance to tangata whenua. The District Council shall have regard to the Mahaanui Iwi Management Plan when preparing or changing the District Plan, to the extent its content has a bearing on resource management issues of the District.

118. The Mahaanui Iwi Management Plan (MIMP) 2013 was released on 1 March 2013.

119. The MIMP is a tool for tangata whenua to express their identity as manawhenua and their objectives as kaitiaki, to protect their taonga and resources, and their relationships with these. The MIMP seeks to ensure that these taonga and resources are recognised and protected in the decision-making of agencies with statutory responsibilities to tangata whenua. Importantly it is also a tool

that assists Papatipu Rūnanga representatives to articulate their values, issues and policy into statutory processes.
120. The MIMP includes both general objectives and policies about the management of land, air, and water, and also includes catchment specific objectives and policies.
121. Section 5.3 Wai Maori (pp77-98) contains an extensive discussion about tangata whenua rights and interests in freshwater. It provides a suite of Issues, Objectives and Policies for freshwater
122. Section 5.4 Papatuanuku (pp101-124) sets out the Ngai Tahu Subdivision and Development Guidelines that are to be read along-side objectives relating to:

a) Land use planning and management in the takiwā reflects the principle of Ki Uta Ki Tai. (from the mountains to the sea)

b) Rural and urban land use occurs in a manner that is consistent with land capability, the assimilative capacity of catchments and the limits and availability of water resources.

c) Inappropriate land use practices that have a significant and unacceptable effect on water quality and quantity are discontinued.

d) Ngāi Tahu has a prominent and influential role in urban planning and development.

e) Subdivision and development activities implement low impact, innovative and sustainable solutions to water, stormwater, waste and energy issues.

123. Section 5.5 Tane (pp127-137) includes objectives that focus on:

a) Regional policy, planning and decision making in the takiwā reflects the particular interest of Ngāi Tahu in indigenous biodiversity protection, and the importance of mahinga kai to Ngāi Tahu culture and traditions.

b) The customary right of Ngāi Tahu to engage in mahinga kai activity is recognised, protected and enhanced…

c) Customary use, and therefore mahinga kai, is given effect to as a first order priority for freshwater management in the takiwā.

124. Section 6.4 (pp213-224) addresses issues of particular significance to the lands and waters of the Waimakariri catchment within which the Site lies.
125. Relevant Objectives relating to urban development of land in that catchment include:

a) The natural “energy, vitality and life” of the Waimakariri River as a braided river is protected and restored.

b) The discharge of contaminants to the Waimakariri and its tributaries is eliminated.

c) Water quality and flows in the Waimakariri and its tributaries are improved to enable whānau and the wider community to have places they can go to swim and fish.

d) The mauri and mahinga kai values of the Waimakariri and its tributaries and associated springs, wetlands and lagoons are protected and restored; mō tātou, ā, mō kā uri ā muri ake nei.

126. A key issue relating to subdivision and development is that subdivision and development activities in the lower catchment have the potential to adversely affect Ngāi Tahu values such as waterways, mahinga kai and sites of significance (Issue Wai4).
127. The proposal provides for full urban reticulation of the three waters and is consistent with the objectives and policies contained in Chapters 5.3 and 5.4 of the MIMP. The proposal does not preclude individual land owners from installing rainwater collection and use from roof areas at the time of building development.
128. The proposal has been designed taking into consideration the potential effect of resultant subdivision and development on the rivers and streams that flow into the lowland rivers.
129. Overall it is considered that the proposal will not have adverse impact on the cultural values of iwi as set out within the MIMP.

SECTION 32 ASSESSMENT

130. A Section 32 assessment is contained in **Appendix 3.**
131. In summary, the PWDP zoning and associated rules (RLZ Zone with a minimum lot size for subdivision and a dwelling 4ha) do not meet the needs and aspirations of the current owners.
132. Strategic Council planning documents (specifically the WDDS) have a focus on only meeting urban growth demands within urban environments of existing towns. They favour intensification (15hh/ha) and a strict allocation of capacity by development areas. It is a control and command regime consistent with Map A of Chapter 6 of the CRPS but is out of step with the requirements of the NPS-UD which requires a more flexible, responsive approach, prohibits a hard fixed unmoveable urban/rural boundary.
133. This approach leaves little room for new proposals or proposals that do not sit square with the standard array of GRZ/medium density or SETZ (Settlement Zone). SETZ applies to some of the District’s smaller settlements outside Greater Christchurch.
134. Neither LRZ nor Large Lot Residential (LLRZ) as notified in the PWDP is an efficient use of this block of land located as it is immediately adjoining the urban area of Rangiora, and in a location easily accessible to the town centre by active transport modes as well as car and several district reserves.
135. If this Site is not zoned for LLRZ D2 (minimum average lot size 1500m^2) use to enable residential re-development then it will drive pressure to re-zone elsewhere. That step potentially will not have the significant benefits to Rangiora long term in relation to enabling a well-functioning urban environment that enables people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future. Additionally re-zoning to LLRZ D2 will contribute to providing additional development capacity to meet the different needs of people and communities in a planned manner and

consistent with the NPS-UD.
136. The Site can readily be developed to reflect the principles of the Urban Design Protocol with values of character, context, and connectivity.
137. The Section 32 assessment concludes that the proposal to re-zone the Site from LRZ zone to LLRZ D2 Zone (average lot size 1500m2) is the most appropriate method for achieving the objectives of the proposal, than the other alternatives considered.
138. Option 2 identified in the s 32 assessment is consistent with some PWDP policies notwithstanding that it does sit square with the strategic intentions signaled in the WDDS and the PWDP approach to providing for development capacity and urban development.
139. Option 2 identified in the s 32 assessment to re-zone the Site is the most appropriate given:

a) The proposals adopt the PWDP zones, development and activity standards with appropriate amendments. This ensures continuity of the District Plan anticipated environmental outcomes and urban amenity for Rangiora and adjoining residential areas;

b) Will be consistent with and give effect to many of the relevant PWDP objectives and policies;

c) It is a logical extension to the developed and developing residential land adjoining the Site while achieving a compact, efficient urban form that removes pressure on isolated rural land elsewhere around Rangiora.

d) It gives effect to the NPS-UD, specifically Objective 6 c) and Policy 8, delivering significant additional development capacity and contributing to a well functioning urban environment.

e) It is assumed that there will be capacity in the public utilities and the existing road network, including planned upgrades, to accommodate the traffic effects of the redevelopment;

f) The proposed Site specific ODP will provide certainty of the final form and disposition of the re-zoned area including its proposals for reserves, roading, future linkages for pedestrian and vehicular traffic.

140. The re-zoning proposal is considered to be appropriate to achieve the sustainable growth and development of Rangiora.
141. The economic, social and environmental benefits of the proposed rezoning outweigh any potential costs.
142. The overall efficiency and effectiveness of the proposed rezoning (Option 2) is high, in comparison to the alternative options set out in the s 32 Assessment which are low (Options One and Four) or low to moderate (Option Three).
143. The PWDP proposes to release land for development in the new Development Areas at Rangiora and Kaiaipoi through a novel and untested certification process that is not clearly derived from RMA statutory powers, nor Local Government Act 2002 (LGA) authority. This approach is not proposed for the LLR Overlay areas. As the proposed Lehmans Road LLR D2 zone proposed by this submission seeks large lot urban densities, it is anticipated that Council may favour the certification process if it accepts the proposed rezoning. This is opposed – rezoning to LLRZ D2 is sought.
144. Potential difficulties with the proposed certification process are identified and discussed in the Section 32 Assessment. (**Appendix 3)**. In summary, the process is hugely discretionary, does not provide conventional rights to an applicant (eg right of objection/appeal) meaning decisions cannot be challenged, and it is not apparent that the process will be appropriately documented with a transparent record of the decision-making within the certification process. Further uncertainty arises in the practicalities of how to negotiate and manage the staging, funding and building of key infrastructure across a range of Sites, and a risk that land supply is controlled by a limited number of large developers. It is a far less efficient and effective method for delivering land for housing than the Council rezoning the land in the PWDP.
145. The proposed rezoning is considered to be the most appropriate, efficient and effective means of achieving the purpose of the RMA.

CONSULTATION

146. The landowners and their consultants have submitted on the WRRS and the WDDS (**Appendix 4)**.
147. The submissions to re-zone as rural residential or identify the Site as suitable for LLRZ have been rejected as noted above. LLRZ but at higher densities as now proposed is considered to be a more efficient use of the land and better meets market demand. 5000m2 sites provide more land is needed for a spacious home and garden.
148. The landowners have been consistent in their wish to find a zone and possible land uses better suited to their needs.

CONCLUSION

173 The submission seeks to rezone 58 ha of land adjoining Rangiora from Lifestyle Rural Zone (LRZ) to Large Lot Residential with a specific density standard (LLRZ D1), minimum average lot size 1500m^2.
149. The Site has a long history of rural lifestyle use. It is not significantly restricted by potential natural hazards especially flooding, nor does it have physical limitations for development for residential purposes as it is not liquefaction prone, and has no known geotechnical limitations but does contain an area of LUC 2 soils. It is near a site of significance to iwi (SASM – 025) being the Rakahuri/Ashley River The Site has access to a collector road and is near to a strategic road giving direct access to the town centre and a range of community amenities and facilities.
150. The Site immediately adjoins the urban area of Rangiora, and is well located to join in to Council utility services. It is well suited for conversion to residential use.
151. The Site is not identified within the westward growth direction for Rangiora in the District Development Strategy 2018 nor is

it part of the DEV-WR development area which adopts Lehmans Road as its western boundary. It is in a location that achieves coherent and compact urban form offering ease of access to business services, community facilities, reserves and the primary road network.
152. The proposed rezoning provides for a connected and high amenity residential living environment not presently available under the PWDP while avoiding and/or mitigating any potential adverse effects on the environment. It will provide for continuing high demand for a variety of high quality residential sections aimed at a particular segment of the housing market in an ideal location, easily accessible to the existing town centre services and facilities. It will broaden the range of housing available. As such, it is consistent with the NPS-UD including Objective 6c) and Policy 8, to be responsive to proposals which supply significant development capacity and contribute to a well functioning urban environment.
153. The use of this Site for residential purposes can be a sustainable and efficient use of land and infrastructure. The proposed rezoning better provides for the social, economic, environmental well-being of the landowners and the Rangiora community than continuation of the current low intensity lifestyle land use on 4ha blocks, or a conventional LLRZ residential use.
154. Any potential adverse effects of the implementation of the proposed rezoning can be assessed at subdivision stage but there has been no restriction on servicing the blocks to date. Capacity will need to be confirmed for infrastructure, power and road network. Any future subdivision of the Site will need to confirm water supply and wastewater treatment and disposal options.
155. Rezoning of the site to LLRZ zone is not inconsistent with the policies and objectives of the PWDP, but it is at odds with the dated CRPS approach to provision of urban growth and housing capacity for Greater Christchurch, to the extent that it is not within an FDA created by Change 1 to the CRPS and is not identified as an LLRZ site under the strategic RRS prepared by the Council.
156. As the proposal helps achieve the purpose of the RMA, and has been shown to be consistent with the relevant provisions of the NPS-UD, the submission can be accepted by Waimakariri District Council.

Original Submission

Summary Reasons for the Submission

The reasons for our submission are outlined below.
a) The preferred relief (**the proposed rezoning**) is both appropriate and necessary to achieve sustainable growth and development of Rangiora and the District and meet the requirements of the National Policy Statement for Urban Development 2020 (**NPS-UD**).
b) The Site identified in Figure 1 and at para 1 of the Preferred Relief above is a logical and preferred location that lends itself to a specific type of housing development not provided within the PWDP as a residential option adjoining but outside the existing urban areas. Nowhere is it possible to develop in a comprehensive, coordinated way a low density, high quality residential environment in the District's towns, the Rural Lifestyle Zone or Settlement Zone as a permitted activity.
c) The requirement for 12/15 hh/ha in GRZ zones (the majority of land in urban areas) drives development to modern scale relatively small urban lots best produced as a package across a significant land holding. The GRZ subdivision standards do not provide for the needs of people who seek a generous sized urban lot residential setting. This is a housing sector that is running against the planning tide of intensification but is, nonetheless, a legitimate form of housing in an appropriate setting. The barriers to such development in urban areas requires an appropriate setting/ location in the rural areas but close to or adjoining the urban areas and at a much lower density than is desired or appropriate (the PWDP LLRZ) to meet the housing needs for generous sized urban lot residential living..
d) The PWDP subdivision standards for LLRZ require lots that are very large for those whose primary interest in a rural setting is a form of residential living, not one that requires significant maintenance and management often involving animals or machinery at scale. Conversely, the GRZ subdivision standards do not provide for the needs of people who seek a large lot residential setting
e) The focus in the PWDP is on prescribing a limited range of residential options and tightly controlling and constraining housing choice within those options. Further urban growth is also tightly constrained and controlled around DEV areas around Rangiora and Kaiapoi but for a very specific form of residential development driven off density requirements that do not match the needs of all landowners.
f) The focus in most new District Plans, driven in part by the National Planning standards, is to simplify the range of zones, to standardize lot sizes, to supposedly create efficiency and certainty through ease of administration of the District Plans. This is done by constraining housing and land development choices by lot size, by location, by built standards and the disposition of built/open elements in a site. However, the National Planning standards do provide for large lot urban residential living, a residential living option which has not been taken up the PWDP (due most likely to the restrictive provisions of the CRPS which only prescribe one from of lower density residential living, at a density of 1-2 hh/ha).
g) This planning approach may be a standard approach to resource allocation but it does not provide a flexible, responsive

approach to innovative and new development options. The Government is creating policy settings that on one hand seek intensification in urban areas, while at the same time pushing away from a land allocation model of planning. The PWDP in striving to face both policy directions has a package of measures that are in fact a major barrier in terms or cost, timeframes and certainties for proposals that are not cut from the suite of housing and development options set out by the PWDP. The allocation of land in preferred development areas, it must be said, runs counter to the Government's push, and now its direction, to free up land for development, to encourage innovation in housing (presently with a focus of intensification) and to make available a range of responses to the need to meet the housing needs of people and communities set out in the NPS-UD.

h) While the weight of demand (and the planning response) is around affordable housing, around small lots and dense development that supports investment in public facilities and amenities such as public and active transport, reserves, and commercial services, there is always a wide spectrum of preferences at play in the housing market. The demand for high quality, generous houses set on generous sized parcels of land within high amenity settings is an important and no less relevant housing sector. There is a strong unmet demand, as confirmed by advice from Bayleys real estate (**Appendix 5**) for larger family homes with room for a pool or similar. Purchasers want to be close the amenities of Rangiora and within walking and cycling distance of local schools. They do not want the only available options – a 4 ha lifestyle block or 5000m^2 rural residential site at Mandeville or Ohoka.

i) Interestingly enough for a nation built on the so-called quarter acre paradise, recent policy and planning interest in housing and land development has now seemingly positioned the 1011m^2 section as a luxury item, as the antithesis of providing for community well-being and needs. It is as though the old quarter acre of itself acts against building a sense of community despite being able to be developed in a planned, structured, coordinated or integrated manner. Rather than being a frivolous discretionary item in land development
and housing choice, a well-planned, well located and properly serviced low density residential environment has much to offer urban environments. They can be tactically used to provide shape and edge to urban areas, they can provide a mass of amenity different from (and potentially complementary to), but no less legitimate in urban outcome terms, to conventional GRZ zoned land.

j) In many ways the approach of a district plan to the role and place of the old quarter acre is not dissimilar to the issues faced by comprehensive retirement villages when first proposed. The idea of dense, almost gated and self-contained communities, with multi storey buildings also did not sit well in many district plans. But now they are accepted as an important part of the urban fabric catering to a specific demographic and health demographic. Most plans enable them.

k) Provision for low density residential in an urban setting, or failing that likelihood, in an adjoining rural zone is a fundamental gap in the district plan.

l) The submission seeks to provide for another housing typology not provided in the PWDP and in a location with significant planning merit. The planning case was made out in a detailed submission to the proposed Rural Residential Strategy (**RRS**) for the land identified in this submission to be "reserved" for conventional Rural Residential zoning in the review of the District Plan. That submission was rejected in favour of a decision ascribing an unspecific strategic significance to Lehmans Road as the urban boundary; simply the decision was that rural residential development here would preclude this area as a future urban growth path, even though this was likely to be very long term as the Waimakariri District Development Strategy (WDDS 2018) for the period up to 2048, does not favour urban growth west of Lehmans Road.

Officer Recommendation

Continue to exclude the area west of Lehmans Road and the racecourse land at Rangiora as growth areas as these were originally considered but not included in the draft RRDS as they trigger the key preliminary criteria of: being on the direct edges of a main town outside of the Projected Infrastructure Boundary (PIB) thereby foreclosing more intensive long-term urban development, and…

Panel Recommendation

The panel accepted the officer recommendations to exclude areas on the fringes of Rangiora in the final RRDS due to these having the potential to foreclose more intensive long-term urban development of the town.

m) In light of the above decision on the Waimakariri Rural Residential Strategy, the proposal now is for a form of high amenity low density urban zoning, which whilst in demand is entirely absent from the PWDP. This will be a long term urban form of development. The proposal set out in the submission will achieve a compact, and efficient, urban form on the edge of Rangiora with excellent connectivity by multiple transport modes. It provides for continuous urban development by enabling a built form which can act as a strong zone or urban boundary.

n) The proposed rezoning will accommodate approximately 311 LLRZ lots1 at the proposed amended density standards for LLRZ D2 (average size 1500m^2). It will contribute to a well-functioning urban environment, meeting the NPS-UD Objective 6(c).

o) Any adverse effects on the environment arising from the proposed rezoning will be minimal, if any, and can be adequately mitigated. A high amenity master planned development is proposed.

p) Significant positive effects arise from the proposed rezoning. It will enable the short term housing demand at Rangiora to be met, and can deliver a housing typology for which there is demand, on lots that are not a burden to the landowners (which is the case for 4ha and the very limited areas of LLRZ D1 with a density of 1-2 hh/ha) and for which there is no provision in the PWDP. At present rates of land uptake there is about 4 years vacant land supply in Rangiora. Given it takes 3-5 years to bring land from zoned state to on the market as developed lots, there is some urgency in providing additional capacity. This proposal helps address an anticipated shortfall in residential zoned plan enabled land.
q) There is no additional cost to the Council in re-zoning the Site as there is expected to be capacity in the public utilities and the existing road network, including planned upgrades.
r) Amendments to PWDP objectives and policies may be necessary to provide for a higher density LLRZ, but of themselves will not act against those relating to Strategic Directions Urban Form and Development and Urban Growth. The PWDP approach to zones and
identification of future development land is already out of step with higher order Resource Management Act 1991 (RMA) statutory documents because they do not give effect to the NPS-UD (and are sought to be amended through this submission).
s) The alternatives of retaining Rural Lifestyle or Large Lot Residential zone across the entire Site are not an efficient use of land which immediately adjoins the urban area of Rangiora, and is highly accessible to the town centre by active transport modes as well as car.
t) The proposed rezoning is consistent with and the most appropriate, efficient and effective means of achieving the purpose of the RMA.

The Site
1. The Site is a 58ha block of land ('the Site') accessed from Lehman Road, Rangiora **(Figure 1)**. It is owned by the two submitters and 12 other landowners.

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1 Assumes 20% of land area taken for servicing including roading, reserves and stormwater management if required.

Figure 1: The site (outlined in blue (Google Earth)

2. The Site is surrounded by RLZ land that is used for a mix of lifestyle and conventional farming. To the NE is the Rangiora Eco Holiday Park, and beyond the Park is the Rangiora Racecourse about 300m away from the nearest lot and 1km from the centre of the Site. Land to the south east is GRZ and part of urban Rangiora with newly developing residential land west of West Belt. About 1.9 km to the NW is Rangiora Airfield. About 1km north of the most northern lot is the Ashley River.
3. The southern-most lot in the proposal with the Rangiora Vet Clinic faces, but does not have access to Rangiora-Oxford Road (State Highway 72). This arterial road provides the main road connection in to the centre of the town. The well-established Fernside Rural residential area is about 2.5km west from the junction of Lehmans and Rangiora-Oxford Roads.

Figure 2: the site is a broader context (Site marked red)

4. The Site is not identified as lying within a preferred growth direction for Rangiora in the Waimakariri 2048 District Development Strategy (2018) (**WDDS**) **(Figure 3)**. No land west of Lehmans Road is included in the West Rangiora Development Area (**DEV-WR**) in the PWDP.

Figure 3: Figure 11 WDDS

5. The Council reviewed its strategic approach to the location and provision of Rural Residential land (now zoned LLRZ in the PWDP) in the WDSS. It adopted the position that it would:

a) Explore tools such as cluster development to manage rural character

b) For rural residential development, adopt an approach that has a primary focus on creating new rural residential areas, with a secondary focus on enabling large lot intensification within existing rural residential areas where there is sufficient community support and servicing available

c) Review the Rural Residential Development Plan for the whole District (pg 21 WDDS).

6. Rangiora presently has a population of 17,841 (2018 Census). It grew steadily between 2006 and 2018. Growth of Rangiora since then has continued in step with the district growth which has increased 8.2% between 2018 and 2021 from 61,300 to 66,300 at an annual average of 2.8% from 2018 to 2020 (Statistics NZ Subnational population projections at 30 June 2021: provisional).

2006 (count)	2013 (count)	2018 (count)
12,165	15,069	17,841

Statistics NZ

Population projections at 30 June

PLANNING STATUS OF THE SITE

Chapter 6 of the Canterbury Regional Policy Statement

7. An assessment of the CRPS is set out in **Appendix 1** to this submission.
8. The Site is within the Greater Christchurch area.
9. It was not shown as a Greenfield Priority Area – Residential (GPA) on Map A of the Canterbury Regional Policy Statement (CRPS). The GPA terminates at Lehmans Road.
10. As a result of the Minister for the Environment's decision of 28 May 2021 on Change 1 to Chapter 6, an area largely south of Oxford Road and a finger of land to the north of Oxford Road was included as a Future Development Area (**FDA**) (**Figure 4** orange).

Figure 4: Map A Chapter 6 Regional Policy Statement Greenfield Priority areas
Site location identified with red circle (appx)

11. The FDAs are intended to accommodate the increased demand for new dwellings in that part of Waimakariri District within the Greater Christchurch Urban Area and to respond to the NPS-UD. They do not provide "plan enabled" land as they need to negotiate a rezoning process to confirm their status as land developable for housing and other urban purposes.
12. The proposal for a LLRZ zone with average lot sizes of 1500m2 is inconsistent with the policy approach of Chapter 6 for Greater Christchurch, in that if fits none of the residential living typologies provided for in Chapter 6 and is not in a location identified for urban or rural residential development. It sits 'between' the urban and rural residential densities provided for in the CRPS (minimum 10 hh/ha for urban in Waimakariri, and average 1-2 hh/ha for rural residential). The proposed density is appx. 6.66 hh/ha.
13. Notwithstanding, the proposal meets all the location and other criteria in CRPS Policy 6.3.9 for rural residential development. It is:

- Outside the CIAL noise contours
- Has some sites with restrictions from the take-off and landing vectors for Rangiora Airfield but not such as to impact its operational capacity.
- Is outside the groundwater protection zone
- Is not within the Waimakariri stop bank system
- Has no views of or to the Port Hills
- Has good access for emergency services
- Will not create reverse sensitivity issues with adjoining land uses; Rangiora Racecourse is 500m away.
- Free of significant natural hazards and is a flat site.
- Supports no significant natural values or ecological values.

• Contains no SASMs.
• Can be integrated into or consolidated with the existing urban area of west Rangiora.
• Contains no surface water bodies so there will be no adverse impacts on these.
• The development will be contingent on an ODP to provide integrated design for subdivision and land use, and provide for the long-term maintenance of a high quality high density rural residential character.
• The proposal is not intended as a staged development towards full urban; rather it is intended to provide a unique residential environment that can stand alone and contribute to the urban fabric of Rangiora like Palmview in east Rangiora, or as Kaiapoi Lakes does for Kaiapoi.

14. Overall, the proposal is not consistent with Chapter 6 but that is more a function of its original purpose when formulated in 2013. Notwithstanding that, the submission for a lower density residential focussed, high quality urban environment that attaches to an existing urban area and that promotes a coordinated pattern of development has planning merit.

Operative Waimakariri District Plan

15. The Site is zoned Rural in the Operative Plan. The minimum lot size for subdivision and a dwelling is 4 ha.

Proposed Waimakariri District Plan

16. The Site is zoned Rural Lifestyle Zone **(LRZ) (Figure 4).** The minimum lot size for subdivision and a dwelling in the LRZ is 4 ha.
17. Oxford Road is a strategic road and Lehmans Road is a collector road.

Figure 5: Proposed District Plan Zoning (site outlined in red)

18. The Site is also subject to, or potentially influenced by, a number of Overlays:
a) Rangiora Airfield Take Off Climb and Approach Obstacle Limitation Surface (**Figure 6**)
b) National Grid Transmission Lines (**Figure 6**)
c) Liquefaction: Liquefaction damage is unlikely (**Figure 6**)
d) Non-Urban Flood Assessment Area (**Figure 7**)
e) Geographic areas: Ecological Area – Plains
f) Ecological District – Low Plains

Figure 6: Rangiora Airfield Take-off and Approach vectors (blue dashed lines); Liquefaction damage unlikely (green)Transmission lines (green lines); Site outlined in red

Figure 7: Non-urban flood assessment & Waimakariri Flood Hazard maps
Blue – medium risk, green – low risk, white – very low

DEVELOPMENT PROPOSAL AND PROPOSED REZONING

19. Subdivision of the Site will create approximately 311 LLRZ D2 lots.
20. The key design drivers for the proposal are:
a) A high amenity premier residential zone with large houses on large sites – average 1500m^2, min 1000m$_2$ based on the St Kilda, Hamilton development concept (**Figure 8**).
b) LLRZ D2 standards would enable a lower density zone in the medium term e.g. 10 years to achieve a high quality consistent character subdivision. If developed as an integrated development subject to an ODP subdivision can be staged for to the proposal.
c) Creating strong connections with the immediate neighbourhood by providing a cohesive interconnected roading layout that picks up direct links to the eastern neighbourhood off Lehmans Road and the northern subdivision roading, and carries them into the Site.
d) Creating a high amenity and diverse residential neighbourhood by providing interfaces to roads, reserves and rural environments.
e) Respecting and building on local identity and character of Rangiora by retaining specific vegetation features from the Site, and anchoring the development into the wider landscape.

21. A development concept can provide for sound urban design by:
a) A hierarchy of movement corridors.
b) Prioritisation of walking and cycling.
c) A north-south alignment of street blocks to maximize solar access and provide for efficient use of lots.

d) Block perimeters being kept as small as practicable to aid permeability and higher public amenity.
e) Enabling a range of housing typologies set in high quality landscape and street setting with generous amenity plantings and curtilage.

Figure 8: St Kilda development images (Bayleys)

22. St Kilda, Cambridge is a premier development on the outskirts of Cambridge, centrally located and with easy access to the Waikato Expressway. It was originally part of a small dairy operation which was dissected by the Waikato Expressway, leaving a portion within the Cambridge Town boundary and the larger balance of the property of approximately 80 ha (which became St Kilda) on the Eastern side of the Expressway, left in the Rural Zone.
23. The initial development concepts were for a Rural Residential type development given the Expressway separation of the existing residential development on the Western side of the Cambridge Bypass, however this was not supported by Council and a new concept of larger residential sections of a 1600m² average size was developed and approved – see https://www.stkilda.nz/page/location/

EFFECTS ON THE ENVIRONMENT

Township growth and urban form

24. The Site immediately adjoins the western edge of urban Rangiora.
25. The WDDS indicated a general preference for the direction of urban growth of Rangiora to the east as a way of balancing up the residential areas around the town centre and some growth to the west.
26. The approach of the WDDS was to signal growth options to be confirmed in the District Plan Review:
The broad directions for greenfield residential growth for the District's main towns are set out in Figures 11 to 14. Further work will be carried out to identify and confirm the exact locations and extent of these residential growth areas, together with the intensification opportunities within existing urban areas. These will be enabled through the District Plan Review and other planning tools.
27. The Strategic Planning documents clearly signal active consideration of growth needs and growth directions. The options available to the Council were constrained by the approach of the CRPS as the District Plan has to give effect to the CRPS and cannot be
inconsistent with it. The CRPS took effect in 2013 and is overdue for review.
28. The CRPS tightly holds urban growth to the constraints of Map A Chapter 6 and the identified FDAs which although amended by Plan Change 1 in 2020 does not respond to the directions of the NPS-UD. In any event the approach is focused on the need for housing in full urban residential land, less on other residential development forms.
29. As such the Site falls outside the planning policy framework for urban growth. However, in terms of urban form and on the ground, there is considerable merit and logic to conversion of this existing LRZ land to a new high amenity residential form that can be integrated into the Rangiora urban fabric.
30. The proposal has the potential to anticipate the longer term growth path confirmed by the decisions on the RRS to protect the future growth option of more intensive urban development in this direction. It can set a pathway to further westward expansion on land
that holds few if any physical barriers to land development.
31. The proposal will contribute to the housing needs of Rangiora and in a form and location that does not undermine the long run urban form of Rangiora. Planned growth confirmed in the PWDP is already intended to extend westwards out to Lehmans Road and to keep the town edge squared up providing depth to future development and providing a rational basis for providing movement networks driven off the key roads such as Rangiora-Oxford Roads. The West Rangiora Future Development Area confirms this approach. The Site sits in the next block west of Lehmans Road so is not proposing a disjointed urban form, nor one that is not part of the long term thinking of urban form and growth for Rangiora.

32. A full residential zoning is proposed under LLRZ D2 and will provide a high quality street character, overall amenity and passive surveillance over the street, and will create the correct lighting standards, roading standard, fully formed footpaths and cycleways required for a high quality urban environment.

Neighbourhood and wider community effects

33. The Site is serviced by a collector road and is close to an arterial road. This provides for ease of access and safe and convenient movement to and from the Site. A planned development co-ordinated by an ODP can facilitate within the site

movement corridors and linkages through the Site to provide for walking and cycling.
34. A key positive neighbourhood and community effect will arise from the existing dwellings and their established gardens and plantings that will anchor new development and provide a point of reference for new dwellings. Development will not be on a bare site; it will take place in an existing established part-residential setting. The transition to a low density, high quality premier residential development will start from a favourable position and minimise the apparent extent and nature of the landscape change.
35. The Site is comparatively large (58.4 ha) and has the potential to support a variety of residential building typologies and this will contribute to a mix of households within the development and provide built form variety and interest in the streetscape. Whilst LLR D2 standards are proposed, it may be that part of the Site is suitable for other higher density forms of development, which would be within scope of the alternative relief, and could be considered as part of the master planning process required for preparation of an ODP (ahead of the hearing). The earlier stages of the St Kilda development were for large lot residential, with more clusters of townhouses included as later stages (and a retirement village). A retirement village is unlikely in this case, given the proximity of the Charles Upham Retirement Village.
36. Rangiora is well-positioned to accommodate and service the needs of a fast-growing resident population that will in turn support more business activity, schools, community facilities and community organisations.

Effects on tangata whenua values
37. The Proposed District Plan does not identify any Sites and Areas of Significance to Maori in the Site, but the nearby Rakahuri/Ashely River identified as SASM-025. This has been scheduled as being
River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species
38. The PWDP has Policy SASM-P8 which is relevant to pre-development processes:
Engagement with rūnanga
Te Ngāi Tūāhuriri Rūnanga and the District Council to encourage engagement with the Rūnanga priorto persons undertaking activities and/or applying for resource consent where the activity has thepotential to adversely affect identified sites or areas of Ngāi Tūāhuriri cultural significance. Where priorengagement with Te Ngāi Tūāhuriri Rūnanga h as not been undertaken by an applicant for an activitythat has the potential to adversely affect an identified site, the District Council will consult with the Rūnanga.
39. The Site is not listed as an archaeological site on the NZ Archaeological Site database.

Landscape and visual effects
40. Rural Lifestyle style development exists on the Site now (a series of 4 ha lots with a dwelling and associated accessory buildings on each). The landscape is dominated by shelter belts, utility buildings, significant trees and planted curtilages around dwellings many of which are well set back off the roads down RoWs.
41. An ODP will help to achieve an integrated, cohesive and coherent development The proposal will lead to a modification of the landscape of the Site from a predominantly lifestyle block landscape to a denser semi-urban environment dominated by residential building that will, in time, get the benefit of street tree and reserve plantings and landscape treatments around the houses.
42. The visual effects which will arise from a change in the number of vegetative and built elements in the landscape are significant, but not avoidable, if the Site is to contribute to the on-going growth of Rangiora. The change will contribute to a high quality amenity and quality of environment and one that will be entirely consistent with and supportive of the rural lifestyle residential development that has successfully established on the Site.

Well-functioning urban environments
43. The Site adjoins the existing built up urban area of Rangiora. Immediately to the east are existing or developing residential areas.
44. The conversion of the Site from present rural lifestyle uses to low density, high quality residential will continue a pattern of outward expansion of Rangiora. Such a change may not be consistent with the PWDP's identification of a Future Development Overlay for west Rangiora only as far west as Lehmans Road, but on the ground it will look and integrate as part of the urban fabric.
45. It will provide some replacement lower density living areas for the existing LLR zones at north west Rangiora – but at much more appropriate higher density that the LLR D1 standard which is 1-2 hh/ha. There are two such areas, shown on the planning maps below. River Road has an 'urban overlay' and is intended to be intensified to urban densities. The land on the opposite (east) side of Lehmans Road is a 'legacy' rural residential zoning which applies under the Operative District Plan. The landowners have developed the adjoining residential subdivision and wish to develop the land for full urban residential development. Services are in place to support this. The constraint to date has been Map A of the CRPS which does not include the land as a Greenfield Priority Area or Future Development Area, GR zoning of this land is consistent with the NPS-UD.

Figure 9: PWDP as notified – LLRZs shown in light grey. Diagonal stripes – urban growth overlay.
Site outlined in red.

46. Rangiora is growing apace. It is attracting significant interest from new home buyers as people respond to the significant investment in upgraded transport links (Northern Corridor and public transport) and a growing economic base for employment within the District and the City.

47. Rangiora has excellent connectivity to the City, both via the new Northern Corridor, and a nascent cycleway link into the City. There is a very regular bus service every half hour.(the No 1 Blue Line) The standard trip takes 70 minutes, and there is a twice daily weekday morning express service from Rangiora, and seven times weekday express out to Rangiora all via Kaiapoi.

48. The Site will step out the western edge of Rangiora, but as it exists in a peri-urban form now, such a change does not alter how the Site interacts with Rangiora as a whole. It is in many ways a functional part of urban Rangiora now; it's only the Zone boundaries and policy framework that create the sense of it not being part of Rangiora.

49. The Site is convenient to the Rakihura/ Ashley recreation trails, the racecourse, Arlington Park, and the airfield. The town centre is easily accessible.

50. The following assessment of the criteria in the NPS-UD for determining a well-functioning urban environment shows that the proposed rezoning will deliver urban, housing and residential outcomes that meet those criteria. There will be a variety of homes enabled by generous lot sizes. The Site is well-positioned, building as it does on an existing township well-serviced by public transport and cycling options, to provide good accessibility to jobs, community services, and open spaces, as well as mitigating climate change impacts and future natural hazards by being not near the coast and well removed from major rivers.

NPS-UD Policy 1

Planning decisions contribute to well functioning urban environments, which are urban environments that, as a minimum:	**Assessment**
(a) have or enable a variety of homes that: (i) meet the needs, in terms of type, price, and location, of different households; and (ii) enable Māori to express their cultural traditions and norms;	The proposal is to have larger lots supporting predominantly standalone dwellings and associated accessory buildings (including generous sized garaging) in an open landscaped garden setting. This will fill a gap in the range of housing typologies available at Rangiora and contribute to a better functioning urban environment overall at Rangiora. It is not necessary for each individual rezoning proposal to have a wide range of housing typologies, and in some circumstances this may not be appropriate. The rezoning will deliver a premier high amenity urban subdivision with generous sized lots which will complement existing and planned higher density residential development at west Rangiora. There is scope with the relief sought for a mix of residential densities. The appropriateness of this can be considered at the master planning/ODP stage. The Site has the potential to create a unique urban environment in Rangiora. It can follow the example of Palmview based on a lake or Kaiapoi Likes providing a niche housing option in Rangiora and the District meeting a need for residential land not constrained to GRZ standards.
(b) N/A business sectors	
(c) have good accessibility for all people between housing, jobs, community services,	The Site has access to a collector road and a strategic road providing easy access to key community amenities and facilities. The town is served by a public bus route to the city, and a cycle trail connecting to Kaiapoi and the City. The new West Rangiora Development Area adjoins the Site to the south. The Site will become closer to Rangiora public transport routes as they extend out to service this new growth area over time.

natural spaces, and open spaces, including by way of public or active transport; and	The Site is in walking distance to Arlington Park and the Rakahuri/Ashley which contains abundant recreations pace. It is easily accessible to the town centre and within walking distance to the Huntingdon Drive local centre.
(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and	The demand for housing and land in Rangiora is largely ahead of the planning means to respond. This proposal will "top up" the land presently set aside in the PWDP and provide a useful buffer to demand. The Site owners have been keen to release this land for more intense development for some time; there is no prospect of land banking.
(e) support reductions in greenhouse gas emissions; and	The Site has significant advantages in being easily accessible to the town centre and reserves, community facilities and schools. The proposal retains a consolidated form to Rangiora with good connectivity and linkages to recreation space and commercial centres reducing the need for car travel.
(f) are resilient to the likely current and future effects of climate change	The Site is within the area of influence of a major river but the non-urban flood assessment maps do not show extensive flooding likely at the Site. Being inland it is not at risk from climate change induced extreme natural hazard events like sea level rise. or river flooding.

Effects on ecosystems and habitats

51. The Site is currently used for a mix of low intensity (grazing) farming, and lifestyle purposes. Shelter belts and utility buildings have been established
52. The Site has been identified in the PWDP with two ecological overlays (the PWDP ecological overlay – Plains and Low Plains Ecological District). They are a district-wide overlays and no specific ecological values have been identified in the Proposed Waimakariri District Plan. These overlays seek primarily to retain indigenous vegetation. The PWDP identifies SASM 025 nearby the Site. That is a Site and Area of Significance to Maori and in SASM - Schedule 1 is identified as *being River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species.*

Effects on natural and physical resources

53. The Site drains in a SE direction towards the newly developing residential area.
54. There will be a degree of site disturbance as part of creating the roading network, and reserves, and as part of curtilage development on each lot.
55. The proposed use for residential activity inevitably leads to loss of some rural productive potential as land owner intentions are not about farming or productive use of the land, but lifestyle use and enjoyment. Built forms and hard surfaces become more dominant.
56. The Site comprises 4ha bocks now and these are not able to be used effectively for productive purposes other than for intensive productions based on tunnel housing and other supported production systems. None exist in the Site now.
57. The Site contains Class 2 and Class 3 soils as defined in the NZ Land Use Inventory (Landcare Research) Land Use Capability classes 1-3 **(Figure 10)**. Productive use of these soils other than for low level purposes i.e. grazing, is not feasible given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production).

Figure 10: Site soils: Site outlined in red; (Canterbury Maps)
Class 2 soils: bright green/Class 3 soils: light green;

Discharges of contaminants into the environment
58. There will be no discharges of contaminants into the environment. Wastewater will discharge to the Council's reticulated system.
59. Stormwater discharges will potentially be to ground given ground conditions or to an approved and consented stormwater management and treatment area which will meet all relevant Council standards.

Risks from natural hazards or hazardous installations
60. The PWDP planning maps show the Site as being within a Non-Urban Flood Assessment Area.
61. The District Plan maps do not identify high flood hazard areas or high coastal flood hazard areas, rather these are identified through the flood assessment certification process. This enables the most up-to-date technical information to be used. However, as a guide, areas that are potentially high hazard can be identified through the Waimakariri District Natural Hazards Interactive Viewer (NH - Introduction).
62. Rules that refer to a Flood Assessment Certificate require a certificate to be obtained from the District Council to determine compliance with the relevant rule. The alternative is to apply for resource consent as set out in the rule.

63. Rule NH-R2 states
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;

64. Assessment of flood risk and consequence can be undertaken at subdivision stage.
65. There will be no hazardous installations proposed on the Site.

Geotechnical assessment
66. The PWDP planning maps show the Site as being "Liquefaction damage is unlikely. Standard investigation procedure outlined in NZS3604 is appropriate".

Contaminated land
67. A Preliminary Site Investigation can be carried out for the Site at subdivision stage.
68. An enquiry of ECAN has identified that two sites at the northern end of the Site potentially contain some contaminated land, which can be investigated further at subdivision stage **(Appendix 6)**. 315 Lehmans Road is an unverified HAIL site (previous use for clay target shooting) and 317 is registered as containing uninvestigated persistent pesticide bulk storage.

Servicing
69. Proposals for servicing the Site and the effects from such servicing in relation to domestic water supply, wastewater, stormwater, roading, and telecommunications will be required for any subdivision consent.

Economic effects
70. It is anticipated that urban development will generate positive economic effects, both from the investigation/development phase and for the longer run economic activity from householders participating in the local economy.

Climate Change effects
71. An assessment of the effects of the proposed rezoning on climate change is included as part of the assessment of a well-functioning urban environment above.
72. A well-functioning urban area that is designed and serviced in an integrated manner, applying sound urban design principles, will enable a reduction in greenhouse gas emissions compared to unplanned, ad hoc development that does not create compact urban forms located where the services and benefits of existing, established urban areas are not readily accessible.
73. There is a triangle of planning influence that can be brought to bear on reducing greenhouse gas emissions
a) Compact urban form minimising distances between homes and work/play options.
b) Proximity of homes to community facilities, services and amenities and business/work areas.
c) Design and provision of movement corridors and linkages that create opportunities other than for vehicles for getting

around.
74. The Site of the proposed rezoning:
a) Helps in retaining a compact urban form to Rangiora.
b) Is easily accessible to the town centre and is located convenient to the recreation resources of the nearby Rakahuri/Ashley River, the airfield and racecourse and Arlington Park.
75. Rangiora has excellent connectivity to the City, both via the Northern Motorway, the new Northern Corridor, a cycle way link to Kaiapoi which is linked to the new north city cycle way along the Northern Corridor and a very regular bus service.

Positive effects
76. The proposed rezoning will provide for the continued growth of Rangiora by managing the development through an ODP. The proposal will provide a buffer to on-going high level demand for lots in Rangiora. It will cater for a specific housing need not found in GRZ Zoned land nor LLRZ land. The proposed rezoning is anticipating a form of development that is a much more efficient use of a qualifying site supporting a well-functioning urban area. It is a positive endorsement of Rangiora as a growth node in the District.
77. The benefits derived from a planned ODP approach include facilitating high levels of connectivity, creating community links to identified focal points. The Site is close to recreation facilities. A coordinated and integrated development will provide a distinctive environmental quality and point of difference to the development.
78. The Site adjoins existing and developing residential development on the western edge of Rangiora.
79. From a community well-being perspective, the provision of additional land for residential growth will continue to support the Council's investment in community infrastructure by maintaining and facilitating growth rates, increasing the rating base and attracting development contributions.

STATUTORY PLANNING ASSESSMENT
80. Submissions must be assessed under the provisions of the RMA, including Part 2 and Section 32 (Requirements for Preparing Evaluation Reports).

National Policy Statements
National Policy Statement on Urban Development Capacity (NPS-UD)

81. The NPS–UD applies to this proposal as it is directed at Tier 1 urban environments, and
Tier 1 local authorities which includes Waimakariri District as part of the Christchurch urban environment that is defined in Table 1 of the NPS, and additionally defined as:
any area of land (regardless of size, and irrespective of local authority or statistical boundaries)
that: is, or is intended to be, predominantly urban in character; and is, or is intended to be, part of
a housing and labour market of at least 10,000 people.
82. The NPS-UD recognises the national significance of:
a) Having well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future; and
b) Providing sufficient development capacity to meet the different needs of people and communities.
83. The NPS outcomes are to be achieved through objectives that address:
a) Planning decisions improving housing affordability by supporting competitive land and development markets.
b) Regional policy statements and district plans enabling more people to live in areas of urban environments near centres or areas with employment opportunities, area well serviced by public transport or a high demand for housing in the area.
c) Urban environments developing and changing over time in response to diverse and changing needs of people, communities and future generations.
d) Local authority decisions on urban development being integrated with infrastructure planning and are strategic over the medium term and long term.
e) Local authority decisions on urban development are responsive particularly for proposals supplying significant development capacity.
f) New Zealand's urban environments support reductions in greenhouse emissions and are resilient to current and future effects of climate change.
84. The key method to achieve these objectives is by development of a Future Development Strategy (FDS). This will set out how the Councils will provide for sufficient development capacity over the next 30 years to meet expected demand. There is no FDS for the greater Christchurch Urban Area that meets the requirements of the NPS-UD.
85. Work on development capacity completed for the NPS - UDC 2016 by the Greater Christchurch Partnership as an Update of the existing Urban Development Strategy (UDS) – Our Space 2019 confirmed what there was a shortage of feasible development capacity for future housing in Waimakariri District for the medium (next 10 years) and long term (10 to 30 years) periods. That assessment is now out of date as it does not address the requirements of the NPS-UD; and rates of take up of land have exceeded projected rates.

86. One of the key changes in the NPS-UD is that local authority decisions on urban development that affects urban environments are responsive, particularly to proposals that would supply significant additional capacity. It also amends the required methodology for housing and business capacity assessments.
87. The current CRPS does not meet the new NPS-UD requirement in relation to proposals for significant additional capacity. Regional councils are required to include criteria in the RPS to determine what plan changes will be treated for the purposes of Policy 8 as adding significantly to development capacity as soon as practicable. ECAN has yet to respond to this requirement.
88. The NPS-UD has immediate effect, so in the meantime, proposals such as this submission must be assessed in the context of the overall intent and purpose of the NPSUD as articulated in the NPS-UD objectives and policies. This includes that NZ has well-functioning environments; provides sufficient development capacity to meet the different needs of people and communities; planning decisions improve housing affordability to contributing to competitive house and land markets; and RMA plans enable more people to live near major employment areas, where there is existing or planned public transport, and where there is high demand for housing.
89. The NPS-UD is the higher order document and its requirements override those of lower order documents where there is a conflict, including regional and district RMA plans.
90. Key objectives and policies in the NPS-UD are assessed here:

NPS-UD Objective/Policy	**Assessment**
Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	The proposed development will further enable Rangiora to sustain itself as a well-functioning urban environment by consolidating the residential area close to the town centre, and provide residential development close to public transport links and existing community and commercial facilities including Huntingdon Drive local centre.
Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.	The proposal provides choices in the Rangiora housing market and in doing so supports housing affordability. Whilst the proposal is for a premier larger lot urban residential development, it is important that all sectors of the market are catered for. This will be more affordable than forcing those wanting large sections out to the much larger and very limited areas of LLR D1 development, or having to purchase 2-3 sections in a standard residential subdivision. There Site is in multiple ownership and the landowners are working together to achieve the rezoning. It will bring more competition into the market by bringing new entrants into the market.
Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply: the area is in or near a centre zone or other area with many employment opportunities the area is well-serviced by existing or planned public transport there is high demand for housing or for business land in the area, relative to other areas within the urban environment.	The CRPS is due for review in 2024 but in the meantime the existing CRPS is not in accordance with the NPS-UD 2020. The proposed rezoning is on the edge of the District's largest centre, which offers a wide range of community and business services, and employment opportunities. It is expected that a proportion of future residents will commute outside the township, but as the township and associated business areas e.g. at Southbrook, continue to grow, this is expected to become proportionally less. Rangiora is well serviced with public transport, there is scope for future mass transit PP, and there is a high demand for housing at Rangiora. The Site adjoins the new West Rangiora Development Area, to the south. Extensions of public transport to service this growth area will be readily accessible to the Site.
Objective 6: Local authority decisions on urban development that affect urban environments are: integrated with infrastructure planning and funding decisions; and strategic over the medium term and long term; and responsive,	Whilst not currently identified as a future growth area in RMA documents, the Site is well placed at the township edge to be serviced by existing infrastructure. Some upgrades may be required, which will be investigated further with Council prior to the hearing. See Policy 8 below for commentary on proposals which supply

particularly in relation to proposals that would supply significant development capacity.	significant development capacity
Objective 8: New Zealand's urban environments: support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change	The proposal adjoins the existing built up are of Rangiora, close to public transport links. Its excellent accessibility to Christchurch City, substantially enhanced with the new Northern Motorway extensions, means it is now highly accessible to these nearby major employment areas. Travel distances are relatively short, minimising vehicle miles and the potential for greenhouse gas emissions. There is a cycleway link from into Christchurch City, and regular bus services, including an express route. The Site is inland and not subject to natural hazard risks associated with sea level rise arising from climate change.
Policy 1 – Planning decisions for well-functioning urban environments	Assessed at para 41-50
Policy 2 - Sufficient development capacity Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.	The proposed rezoning is anticipated to provide sections that will be available for the short term (up to 3 years) and into the medium term (3-10 years) if adopting a more conservative outlook. The locational and amenity advantages of Rangiora also favour strong ongoing demand. The PWDP UFD-O1 Feasible Development Capacity for residential activities identifies the need for 6300 residential units in the period 2018-2028, and 7100 residential units 2028-2048. These numbers are derived from Chapter 6 CRPS Table 6.1. and are out of date. Data from the Council (November 2021) confirms that there are about 800 vacant lots in Rangiora. Building consents are at about 180/year. That means there is about 4 years vacant land supply. A lead in time of 3-5 years is needed to go from rezone to house build so the Council is facing an unnecessary squeeze on land availability. That will translate in to an upward shift in land and section prices as has been the case at Rolleston. The data suggests that the PWDP will be late to the party to ensure there is at least sufficient development capacity to meet expected demand for housing land over the short term, medium term, and long term. There is a looming, inevitable land supply issue so any proposal to add capacity will push the Council closer to meeting the requirements of the NPS-UD. The proposal is consistent with ensuring there is at least sufficient land supply for housing.
Policy 8 – Responsiveness to plan changes Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is: (a) unanticipated by RMA planning	The proposed rezoning is not anticipated by RMA documents - it is not a Greenfield Priority or Future Development Area in the CRPS, or a New Development area in the PWDP. A responsive approach to the proposal is required as it meets the Policy 8 criteria for unanticipated zoning. It will contribution to well functioning urban environments and will add significant development capacity. There is no development capacity for the housing typology proposed – so any provision is significant in this context. The development will deliver appx 311 high amenity large lot residential sites at an average density of 1500m2. This will be higher if a mix

documents; or
(b) out-of-sequence with planned land release

of densities are proposed, which may be appropriate in some parts of the Site, dependent on master planning work to follow.

91. Adopting the submission to re-zone the land, and enable the proposed development on the submission Site will satisfy the objectives and policies of the NPS-UD.

Proposed National Policy Statement for Highly Productive Land (NPS-HPL)

92. The Government proposed in 2019 a NPS-HPL to prevent the loss of productive land and promote its sustainable management. The overall purpose of the proposed NPS-HPL is to improve the way highly-productive land is managed under the Resource Management Act 1991 (RMA) to:

a) Recognise the full range of values and benefits associated with its use for primary production
b) Maintain its availability for primary production for future generations
c) Protect it from inappropriate subdivision, use, and development.

93. The NPS-HPL is still a proposal and not intended to take effect until after Gazettal. At the date of this submission the NPS-HPL has no effect and no assessment of it is required for the purposes of this submission.

94. The Proposed NPS-HPL interim definition of HPL is land defined as Land Use Capability Class 1-3 soils. A portion of the Site contains Class 2 and 3 soils (see **Figure 10)**. Highly productive use of these soils is not realistic given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production). Its present use as lifestyle blocks, low level grazing and agistment is the more likely long run use of the Site if not rezoned.

95. Objective 3 of the Proposed NPS-HPL specifically refers to highly productive soils being protected by avoiding *"uncoordinated urban expansion on highly productive land that has not been subject to a strategic planning process"*. The Site was assessed through a strategic planning process (WDDS 2018) and the RRS as a preferred site for LLRZ development, and rejected for a change in zoning on the basis that it may be required for long term urban growth of Rangiora.

96. It is therefore considered that this submission to re-zone the Site is largely in accordance with the Proposed NPS-HPL.

National Planning Standards

97. The National Planning standards prescribe various matters under the RMA so that there is consistency among planning documents most relevantly here in terms of appellations for zones, and the standards applying to these zones.

98. The proposed rezoning adopts the standard zone appellation, in this case LLRZ as contained in the PWDP.

99. The PWDP identifies plan standards for minimum and average net site areas for the respective zones. These are modified for the proposed rezoning as a higher density LLRZ.

100. The higher density LLR zoning is entirely consistent with the NPS purpose for the LLRZ as reproduced below. In this case, the principal constraint to more intensive development is the peri-urban location where a lower density transition to the rural environment is appropriate (particularly noting that the zone boundary is 'mid block' so there is no natural or physical buffer between rural and residential areas); the existing pattern of 4 ha lots with existing substantial homes and gardens; and the fact that the premier large lot subdivision proposed relies on consistency of housing quality and character to be deliver on this vision for the area.

Large lot residential zone

Areas used predominantly for residential activities and buildings such as detached houses on lots larger than those of the Low density residential and General residential zones, and where there are particular landscape characteristics, physical limitations or other constraints to more intensive development.

Low density residential zone

Areas used predominantly for residential activities and buildings consistent with a suburban scale and subdivision pattern, such as one to two storey houses with yards and landscaping, and other compatible activities.[2]

Canterbury Regional Policy Statement 2013 (CRPS)

101. Chapter 6 of the RPS *"provides a resource management framework for the recovery of Greater Christchurch, to enable and support recovery and rebuilding, including restoration and enhancement, for the area through to 2028. Recovery in Greater Christchurch is also supported by the provisions in Chapter 5 notated as 'Entire Region'. The provisions in the remainder of the RPS also apply.3"*

102. An assessment of the proposed rezoning against the relevant CRPS Objectives and Policies is set out in **Appendix 1**. This should be read in the context of the CRPS being overdue for review and that it does not provide a regional response to the NPS-

UD. The
need to focus on earthquake recovery has now passed and so many of the directive provisions need to be given appropriate 'weight' in a new national policy environment with a focus on flexible, responsive panning approaches that better provide for people's needs and well-being.

103. That assessment shows that

a) The development proposal achieves the objectives for the location, design and function of new developments (Objective 5.2.1)

b) The traffic effects of the proposal are unlikely to give rise to adverse effects and so achieves CRPS objectives for the strategic land transport network (Policy 5.3.7)

c) The Site falls outside the FDAs shown on Map A of Chapter 6 and in that regard is inconsistent with RPS Policy 6.2.1 clauses 1 to 3.

1. identifies priority areas for urban development within Greater Christchurch;

2. identifies Key Activity Centres which provide a focus for high quality, and, where appropriate, mixed-use development that incorporates the principles of good urban design;

3. avoids urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS

d) The environmental effects assessment outlined above establish that the proposed development is consistent and will not give rise to any concerns with respect to all the matters listed in RPS Policy 6.2.1 clauses 4. to 11. These matters are:

6.2.1 Recovery framework

Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that:

1. As above;

2. As above;

3. As above;

4. protects outstanding natural features and landscapes including those within the Port Hills from inappropriate subdivision, use and development;

5. protects and enhances indigenous biodiversity and public space;

6. maintains or improves the quantity and quality of water in groundwater aquifers and surface waterbodies, and quality of ambient air;

7. maintains the character and amenity of rural areas and settlements;

8. protects people from unacceptable risk from natural hazards and the effects of sea-level rise;

9. integrates strategic and other infrastructure and services with land use development;

10. achieves development that does not adversely affect the efficient operation, use, development, appropriate upgrade, and future planning of strategic infrastructure and freight hubs;

11. optimises use of existing infrastructure; and

12. N/A

e) The proposed rezoning achieves policies relating to:

- Sustainability;
- Integration of transport infrastructure and land use;
- Urban design; and
- Biodiversity, natural hazards, landscape, soils, contaminated land.

104. In terms of the CRPS polices for rural residential developments (Policy 6.3.9) the proposal sits square with all policy matters other than being a location identified in an adopted Rural Residential Strategy; and being at a higher density than provided for under this policy (ie greater than 1-2 hh/ha). As such it has a majority of features entirely consistent with the policy.

105. The CRPS includes housing capacity targets as below

6.2.1a Targets for sufficient, feasible development capacity for housing [inserted in accordance with sections 55(2) and 55(A) of the Resource Management Act 1991, from the National Policy Statement on Urban Development Capacity 2016]

For the period 2018-2048, sufficient, feasible development capacity for housing is enabled in Greater Christchurch in accordance with Table 6.1.

Table 6.1 Targets for housing development capacity in Greater Christchurch, 2018-2048

106. These derive from Our Space, under the requirements of the then NPS-Urban Development Capacity 2016, since replaced by the NPS-UD 2020. The targets (known as bottomlines in the NPS-UD) are to be treated as 'minimums' not 'maximums'.

Policy 6.3.12
enables urban development in the Rangiora and Kaiapoi FDAs (new Development Areas in the PWDP) where needed to meet the medium term targets. This a 'minimum' allocation approach contrary to the NPS-UD. The NPS-UD favours over allocation, including in locations unanticipated by RMA plans, where it will add additional development capacity, can be integrated with infrastructure planning and funding, and will contribute to well functioning urban environments – as is the case the proposed Lehmans LLR D2 zone.
107. The proposed Lehmans LLR D2 zone is consistent with the CRPS except with respect to those parts of the CRPS which are out of step with and do not give effect to the higher order plan, the NPS-UD.

Proposed Waimakariri District Plan
108. An assessment of this proposal against the relevant PWDP Objectives and Policies for urban growth and development as notified on 17 September 2021 is set out in **Appendix 2.**
109. That assessment shows that the proposed rezoning is entirely consistent with the relevant objectives and policies, including as sought to be amended by this submission. Those amendments are to UFD-P3 Identification/location and extension of Large Lot Residential Zone areas; and LLRZ-O1 and LLRZ- P1-5 and reflect the intent and outcomes intended for the proposed LLRZ D2 zone, which is a higher density LLRZ zone than the PWDP LLRZ zone (renamed LLRZ D1 in this submission).

ASSESSMENT AGAINST OTHER PLANNING DOCUMENTS
Our Space 2018-2048 Greater Christchurch Settlement Update (2019)
110. Our Space is a non-statutory document prepared under the Local Government Act. It
"responds to the new Government Policy Statement on Land Transport, which has increased funding for mass public transit schemes, and meets the requirement of the National Policy Statement on Urban Development Capacity (NPS-UDC) 2016 to prepare a
future development strategy…. Specifically, it:
• sets out how targets for housing for the next 30 years will be met, accommodating an additional 150,000 people;
• identifies locations for housing growth, encouraging Central City and suburban centre living while providing for township growth in Rolleston, Rangiora and Kaiapoi;…
• promotes a compact urban form, which provides for efficient transport and locates development in a manner that takes into account climate change and sea level rise.[4].

..Underpinning this settlement pattern approach is the vision for a transformation of the transport network that fosters much greater public and active transport usage, and reduced reliance on the private vehicle.
111. Our Space acknowledges that this will require commitment from the Government to invest in the necessary improvements to our transport system, which could include investing in rapid transit services. To date, there has been no successful business case for improved public transportation, including not as a Covid 19 fast track infrastructure project.
112. The Our Space housing capacity targets (Table 3) and Future Development Areas are related to growth of urban areas.
113. Our Space, like the CRPS (and the Operative District Plan) are now out of date, as they do not reflect or give effect to the new requirements of the NPS-UD.

Waimakariri 2048 District Development Strategy (WDDS)
114. The preferred growth directions for Rangiora in the WDDS 2048 (2018) are outlined above (under 'Site') i.e. westwards to Lehmans Road, and otherwise eastwards. However, the Council in its decision on the RRS, recognized west of Lehmmans Road as a potential longer town urban growth area.
115. The WDDS Rangiora Snapshot (pp38-39) -when looking ahead to 2048 proposed that:
a) Rangiora remains the District's largest town
b) 30,000 – estimated population (2048)
c) 12,025 – estimated households
d) 5,025 - new households in Rangiora
e) Continues to accommodate one third of the District's residential growth
f) 167 – estimated annual building consents for new dwellings for the next 30 years
g) 423 hectares of additional feasible residential land required by 2048 (this includes capacity in remaining stages of existing residential developments as well as new greenfield areas inside and outside of the Infrastructure Boundary)
h) Future residential growth directions proposed to the east (predominantly) and west of the current town
i) Opportunities for intensification/regeneration to be identified
j) New growth directions take into account areas of unacceptable natural hazard risk and areas of significant environmental and cultural values
k) New growth areas to connect into existing sewer and water networks

l) Stormwater Levels of Service designed to meet increased performance requirements

116. At the 2018 Census Rangiora had a population of 17,841, and 7314 total dwellings (incl those unoccupied and under construction). Population projections for the District show an average annual change 2018-2020 of 1700 persons. If Rangiora continues to attract a third of all district growth as stated in the WDSS then Rangiora's population in 2021 will be around 18,900.

Mahaanui Iwi Management Plan

117. Part 1 of the PWDP in a section "Mana Whenua" sets out the position with respect to iwi and the review of the district Plan:

a) The District's territorial area sits within the takiwā (territory) of Ngāi Tūāhuriri which is one of eighteen Ngāi Tahu regional papatipu rūnanga, constituted under the ***Te Rūnanga o Ngāi Tahu Act 1996*** *to represent* ***mana whenua*** *interests.*

b) The preparation and change of a district plan must take into account relevant iwi documents. For the District, Ngāi Tahu has set out its resource management values, issues, objectives and policies within the Mahaanui Iwi Management Plan (2013).

c) The Mahaanui Iwi Management Plan identifies objectives, issues and policies for natural resource and environmental management for six pāpatipu rūnanga (including Te Ngāi Tūāhuriri Rūnanga). It seeks to ensure that the taonga and resources of Ngāi

Tahu mana whenua are recognised and protected in the decision-making of statutory agencies. The Mahaanui Iwi Management Plan contains a comprehensive suite of policies and objectives addressing the range of resource management matters of significance to tangata whenua. The District Council shall have regard to the Mahaanui Iwi Management Plan when preparing or changing the District Plan, to the extent its content has a bearing on resource management issues of the District.

118. The Mahaanui Iwi Management Plan (MIMP) 2013 was released on 1 March 2013.

119. The MIMP is a tool for tangata whenua to express their identity as manawhenua and their objectives as kaitiaki, to protect their taonga and resources, and their relationships with these. The MIMP seeks to ensure that these taonga and resources are recognised and protected in the decision-making of agencies with statutory responsibilities to tangata whenua. Importantly it is also a tool that assists Papatipu Rūnanga representatives to articulate their values, issues and policy into statutory processes.

120. The MIMP includes both general objectives and policies about the management of land, air, and water, and also includes catchment specific objectives and policies.

121. Section 5.3 Wai Maori (pp77-98) contains an extensive discussion about tangata whenua rights and interests in freshwater. It provides a suite of Issues, Objectives and Policies for freshwater

122. Section 5.4 Papatuanuku (pp101-124) sets out the Ngai Tahu Subdivision and Development Guidelines that are to be read along-side objectives relating to:

a) Land use planning and management in the takiwā reflects the principle of Ki Uta Ki Tai. (from the mountains to the sea)

b) Rural and urban land use occurs in a manner that is consistent with land capability, the assimilative capacity of catchments and the limits and availability of water resources.

c) Inappropriate land use practices that have a significant and unacceptable effect on water quality and quantity are discontinued.

d) Ngāi Tahu has a prominent and influential role in urban planning and development.

e) Subdivision and development activities implement low impact, innovative and sustainable solutions to water, stormwater, waste and energy issues.

123. Section 5.5 Tane (pp127-137) includes objectives that focus on:

a) Regional policy, planning and decision making in the takiwā reflects the particular interest of Ngāi Tahu in indigenous biodiversity protection, and the importance of mahinga kai to Ngāi Tahu culture and traditions.

b) The customary right of Ngāi Tahu to engage in mahinga kai activity is recognised, protected and enhanced…

c) Customary use, and therefore mahinga kai, is given effect to as a first order priority for freshwater management in the takiwā.

124. Section 6.4 (pp213-224) addresses issues of particular significance to the lands and waters of the Waimakariri catchment within which the Site lies.

125. Relevant Objectives relating to urban development of land in that catchment include:

a) The natural "energy, vitality and life" of the Waimakariri River as a braided river is protected and restored.

b) The discharge of contaminants to the Waimakariri and its tributaries is eliminated.

c) Water quality and flows in the Waimakariri and its tributaries are improved to enable whānau and the wider community to have places they can go to swim and fish.

d) The mauri and mahinga kai values of the Waimakariri and its tributaries and associated springs, wetlands and lagoons are protected and restored; mō tātou, ā, mō kā uri ā muri ake nei.

126. A key issue relating to subdivision and development is that subdivision and development activities in the lower catchment

have the potential to adversely affect Ngāi Tahu values such as waterways, mahinga kai and sites of significance (Issue Wai4).
127. The proposal provides for full urban reticulation of the three waters and is consistent with the objectives and policies contained in Chapters 5.3 and 5.4 of the MIMP. The proposal does not preclude individual land owners from installing rainwater collection and use from roof areas at the time of building development.
128. The proposal has been designed taking into consideration the potential effect of resultant subdivision and development on the rivers and streams that flow into the lowland rivers.
129. Overall it is considered that the proposal will not have adverse impact on the cultural values of iwi as set out within the MIMP.

SECTION 32 ASSESSMENT

130. A Section 32 assessment is contained in **Appendix 3.**
131. In summary, the PWDP zoning and associated rules (RLZ Zone with a minimum lot size for subdivision and a dwelling 4ha) do not meet the needs and aspirations of the current owners.
132. Strategic Council planning documents (specifically the WDDS) have a focus on only meeting urban growth demands within urban environments of existing towns. They favour intensification (15hh/ha) and a strict allocation of capacity by development areas. It is a control and command regime consistent with Map A of Chapter 6 of the CRPS but is out of step with the requirements of the NPS-UD which requires a more flexible, responsive approach, prohibits a hard fixed unmoveable urban/rural boundary.
133. This approach leaves little room for new proposals or proposals that do not sit square with the standard array of GRZ/medium density or SETZ (Settlement Zone). SETZ applies to some of the District's smaller settlements outside Greater Christchurch.
134. Neither LRZ nor Large Lot Residential (LLRZ) as notified in the PWDP is an efficient use of this block of land located as it is immediately adjoining the urban area of Rangiora, and in a location easily accessible to the town centre by active transport modes as well as car and several district reserves.
135. If this Site is not zoned for LLRZ D2 (minimum average lot size 1500m^2) use to enable residential re-development then it will drive pressure to re-zone elsewhere. That step potentially will not have the significant benefits to Rangiora long term in relation to enabling a well-functioning urban environment that enables people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future. Additionally re-zoning to LLRZ D2 will contribute to providing additional development capacity to meet the different needs of people and communities in a planned manner and consistent with the NPS-UD.
136. The Site can readily be developed to reflect the principles of the Urban Design Protocol with values of character, context, and connectivity.
137. The Section 32 assessment concludes that the proposal to re-zone the Site from LRZ zone to LLRZ D2 Zone (average lot size 1500m$_2$) is the most appropriate method for achieving the objectives of the proposal, than the other alternatives considered.
138. Option 2 identified in the s 32 assessment is consistent with some PWDP policies notwithstanding that it does sit square with the strategic intentions signaled in the WDDS and the PWDP approach to providing for development capacity and urban development.
139. Option 2 identified in the s 32 assessment to re-zone the Site is the most appropriate given:
a) The proposals adopt the PWDP zones, development and activity standards with appropriate amendments. This ensures continuity of the District Plan anticipated environmental outcomes and urban amenity for Rangiora and adjoining residential areas;
b) Will be consistent with and give effect to many of the relevant PWDP objectives and policies;
c) It is a logical extension to the developed and developing residential land adjoining the Site while achieving a compact, efficient urban form that removes pressure on isolated rural land elsewhere around Rangiora.
d) It gives effect to the NPS-UD, specifically Objective 6 c) and Policy 8, delivering significant additional development capacity and contributing to a well functioning urban environment.
e) It is assumed that there will be capacity in the public utilities and the existing road network, including planned upgrades, to accommodate the traffic effects of the redevelopment;
f) The proposed Site specific ODP will provide certainty of the final form and disposition of the re-zoned area including its proposals for reserves, roading, future linkages for pedestrian and vehicular traffic.
140. The re-zoning proposal is considered to be appropriate to achieve the sustainable growth and development of Rangiora.
141. The economic, social and environmental benefits of the proposed rezoning outweigh any potential costs.
142. The overall efficiency and effectiveness of the proposed rezoning (Option 2) is high, in comparison to the alternative options set out in the s 32 Assessment which are low (Options One and Four) or low to moderate (Option Three).
143. The PWDP proposes to release land for development in the new Development Areas at Rangiora and Kaiaipoi through a novel and untested certification process that is not clearly derived from RMA statutory powers, nor Local Government Act 2002 (LGA) authority. This approach is not proposed for the LLR Overlay areas. As the proposed Lehmans Road LLR D2 zone proposed by this submission seeks large lot urban densities, it is anticipated that Council may favour the certification process if it accepts the proposed rezoning. This is opposed – rezoning to LLRZ D2 is sought.
144. Potential difficulties with the proposed certification process are identified and discussed in the Section 32 Assessment.

(**Appendix 3)**. In summary, the process is hugely discretionary, does not provide conventional rights to an applicant (eg right of objection/appeal) meaning decisions cannot be challenged, and it is not apparent that the process will be appropriately documented with a transparent record of the decision-making within the certification process. Further uncertainty arises in the practicalities of how to negotiate and manage the staging, funding and building of key infrastructure across a range of Sites, and a risk that land supply is controlled by a limited number of large developers. It is a far less efficient and effective method for delivering land for housing than the Council rezoning the land in the PWDP.
145. The proposed rezoning is considered to be the most appropriate, efficient and effective means of achieving the purpose of the RMA.

CONSULTATION
146. The landowners and their consultants have submitted on the WRRS and the WDDS (**Appendix 4)**.
147. The submissions to re-zone as rural residential or identify the Site as suitable for LLRZ have been rejected as noted above. LLRZ but at higher densities as now proposed is considered to be a more efficient use of the land and better meets market demand. 5000m^2 sites provide more land is needed for a spacious home and garden.
148. The landowners have been consistent in their wish to find a zone and possible land uses better suited to their needs.

CONCLUSION

173 The submission seeks to rezone 58 ha of land adjoining Rangiora from Lifestyle Rural Zone (LRZ) to Large Lot Residential with a specific density standard (LLRZ D1), minimum average lot size 1500m^2.
149. The Site has a long history of rural lifestyle use. It is not significantly restricted by potential natural hazards especially flooding, nor does it have physical limitations for development for residential purposes as it is not liquefaction prone, and has no known geotechnical limitations but does contain an area of LUC 2 soils. It is near a site of significance to iwi (SASM – 025) being the Rakahuri/Ashley River The Site has access to a collector road and is near to a strategic road giving direct access to the town centre and a range of community amenities and facilities.
150. The Site immediately adjoins the urban area of Rangiora, and is well located to join in to Council utility services. It is well suited for conversion to residential use.
151. The Site is not identified within the westward growth direction for Rangiora in the District Development Strategy 2018 nor is it part of the DEV-WR development area which adopts Lehmans Road as its western boundary. It is in a location that achieves coherent and compact urban form offering ease of access to business services, community facilities, reserves and the primary road network.
152. The proposed rezoning provides for a connected and high amenity residential living environment not presently available under the PWDP while avoiding and/or mitigating any potential adverse effects on the environment. It will provide for continuing high demand for a variety of high quality residential sections aimed at a particular segment of the housing market in an ideal location, easily accessible to the existing town centre services and facilities. It will broaden the range of housing available. As such, it is consistent with the NPS-UD including Objective 6c) and Policy 8, to be responsive to proposals which supply significant development capacity and contribute to a well functioning urban environment.
153. The use of this Site for residential purposes can be a sustainable and efficient use of land and infrastructure. The proposed rezoning better provides for the social, economic, environmental well-being of the landowners and the Rangiora community than continuation of the current low intensity lifestyle land use on 4ha blocks, or a conventional LLRZ residential use.
154. Any potential adverse effects of the implementation of the proposed rezoning can be assessed at subdivision stage but there has been no restriction on servicing the blocks to date. Capacity will need to be confirmed for infrastructure, power and road network. Any future subdivision of the Site will need to confirm water supply and wastewater treatment and disposal options.
155. Rezoning of the site to LLRZ zone is not inconsistent with the policies and objectives of the PWDP, but it is at odds with the dated CRPS approach to provision of urban growth and housing capacity for Greater Christchurch, to the extent that it is not within an FDA created by Change 1 to the CRPS and is not identified as an LLRZ site under the strategic RRS prepared by the Council.
156. As the proposal helps achieve the purpose of the RMA, and has been shown to be consistent with the relevant provisions of the NPS-UD, the submission can be accepted by Waimakariri District Council.

Original Submission

Summary Reasons for the Submission

The reasons for our submission are outlined below.
a) The preferred relief (**the proposed rezoning**) is both appropriate and necessary to achieve sustainable growth and

development of Rangiora and the District and meet the requirements of the National Policy Statement for Urban Development 2020 (**NPS-UD**).

b) The Site identified in Figure 1 and at para 1 of the Preferred Relief above is a logical and preferred location that lends itself to a specific type of housing development not provided within the PWDP as a residential option adjoining but outside the existing urban areas. Nowhere is it possible to develop in a comprehensive, coordinated way a low density, high quality residential environment in the District's towns, the Rural Lifestyle Zone or Settlement Zone as a permitted activity.

c) The requirement for 12/15 hh/ha in GRZ zones (the majority of land in urban areas) drives development to modern scale relatively small urban lots best produced as a package across a significant land holding. The GRZ subdivision standards do not provide for the needs of people who seek a generous sized urban lot residential setting. This is a housing sector that is running against the planning tide of intensification but is, nonetheless, a legitimate form of housing in an appropriate setting. The barriers to such development in urban areas requires an appropriate setting/ location in the rural areas but close to or adjoining the urban areas and at a much lower density than is desired or appropriate (the PWDP LLRZ) to meet the housing needs for generous sized urban lot residential living..

d) The PWDP subdivision standards for LLRZ require lots that are very large for those whose primary interest in a rural setting is a form of residential living, not one that requires significant maintenance and management often involving animals or machinery at scale. Conversely, the GRZ subdivision standards do not provide for the needs of people who seek a large lot residential setting

e) The focus in the PWDP is on prescribing a limited range of residential options and tightly controlling and constraining housing choice within those options. Further urban growth is also tightly constrained and controlled around DEV areas around Rangiora and Kaiapoi but for a very specific form of residential development driven off density requirements that do not match the needs of all landowners.

f) The focus in most new District Plans, driven in part by the National Planning standards, is to simplify the range of zones, to standardize lot sizes, to supposedly create efficiency and certainty through ease of administration of the District Plans. This is done by constraining housing and land development choices by lot size, by location, by built standards and the disposition of built/open elements in a site. However, the National Planning standards do provide for large lot urban residential living, a residential living option which has not been taken up the PWDP (due most likely to the restrictive provisions of the CRPS which only prescribe one from of lower density residential living, at a density of 1-2 hh/ha).

g) This planning approach may be a standard approach to resource allocation but it does not provide a flexible, responsive approach to innovative and new development options. The Government is creating policy settings that on one hand seek intensification in urban areas, while at the same time pushing away from a land allocation model of planning. The PWDP in striving to face both policy directions has a package of measures that are in fact a major barrier in terms or cost, timeframes and certainties for proposals that are not cut from the suite of housing and development options set out by the PWDP. The allocation of land in preferred development areas, it must be said, runs counter to the Government's push, and now its direction, to free up land for development, to encourage innovation in housing (presently with a focus of intensification) and to make available a range of responses to the need to meet the housing needs of people and communities set out in the NPS-UD.

h) While the weight of demand (and the planning response) is around affordable housing, around small lots and dense development that supports investment in public facilities and amenities such as public and active transport, reserves, and commercial services, there is always a wide spectrum of preferences at play in the housing market. The demand for high quality, generous houses set on generous sized parcels of land within high amenity settings is an important and no less relevant housing sector. There is a strong unmet demand, as confirmed by advice from Bayleys real estate (**Appendix 5**) for larger family homes with room for a pool or similar. Purchasers want to be close the amenities of Rangiora and within walking and cycling distance of local schools. They do not want the only available options – a 4 ha lifestyle block or 5000m^2 rural residential site at Mandeville or Ohoka.

i) Interestingly enough for a nation built on the so-called quarter acre paradise, recent policy and planning interest in housing and land development has now seemingly positioned the 1011m^2 section as a luxury item, as the antithesis of providing for community well-being and needs. It is as though the old quarter acre of itself acts against building a sense of community despite being able to be developed in a planned, structured, coordinated or integrated manner. Rather than being a frivolous discretionary item in land development
and housing choice, a well-planned, well located and properly serviced low density residential environment has much to offer urban environments. They can be tactically used to provide shape and edge to urban areas, they can provide a mass of amenity different from (and potentially complementary to), but no less legitimate in urban outcome terms, to conventional GRZ zoned land.

j) In many ways the approach of a district plan to the role and place of the old quarter acre is not dissimilar to the issues faced by comprehensive retirement villages when first proposed. The idea of dense, almost gated and self-contained communities, with multi storey buildings also did not sit well in many district plans. But now they are accepted as an important part of the urban fabric catering to a specific demographic and health demographic. Most plans enable them.

k) Provision for low density residential in an urban setting, or failing that likelihood, in an adjoining rural zone is a fundamental gap in the district plan.

l) The submission seeks to provide for another housing typology not provided in the PWDP and in a location with significant planning merit. The planning case was made out in a detailed submission to the proposed Rural Residential Strategy (**RRS**) for

the land identified in this submission to be “reserved” for conventional Rural Residential zoning in the review of the District Plan. That submission was rejected in favour of a decision ascribing an unspecific strategic significance to Lehmans Road as the urban boundary; simply the decision was that rural residential development here would preclude this area as a future urban growth path, even though this was likely to be very long term as the Waimakariri District Development Strategy (WDDS 2018) for the period up to 2048, does not favour urban growth west of Lehmans Road.

Officer Recommendation

Continue to exclude the area west of Lehmans Road and the racecourse land at Rangiora as growth areas as these were originally considered but not included in the draft RRDS as they trigger the key preliminary criteria of: being on the direct edges of a main town outside of the Projected Infrastructure Boundary (PIB) thereby foreclosing more intensive long-term urban development, and…

Panel Recommendation

The panel accepted the officer recommendations to exclude areas on the fringes of Rangiora in the final RRDS due to these having the potential to foreclose more intensive long-term urban development of the town.

m) In light of the above decision on the Waimakariri Rural Residential Strategy, the proposal now is for a form of high amenity low density urban zoning, which whilst in demand is entirely absent from the PWDP. This will be a long term urban form of development. The proposal set out in the submission will achieve a compact, and efficient, urban form on the edge of Rangiora with excellent connectivity by multiple transport modes. It provides for continuous urban development by enabling a built form which can act as a strong zone or urban boundary.

n) The proposed rezoning will accommodate approximately 311 LLRZ lots1 at the proposed amended density standards for LLRZ D2 (average size 1500m^2). It will contribute to a well-functioning urban environment, meeting the NPS-UD Objective 6(c).

o) Any adverse effects on the environment arising from the proposed rezoning will be minimal, if any, and can be adequately mitigated. A high amenity master planned development is proposed.

p) Significant positive effects arise from the proposed rezoning. It will enable the short term housing demand at Rangiora to be met, and can deliver a housing typology for which there is demand, on lots that are not a burden to the landowners (which is the case for 4ha and the very limited areas of LLRZ D1 with a density of 1-2 hh/ha) and for which there is no provision in the PWDP. At present rates of land uptake there is about 4 years vacant land supply in Rangiora. Given it takes 3-5 years to bring land from zoned state to on the market as developed lots, there is some urgency in providing additional capacity. This proposal helps address an anticipated shortfall in residential zoned plan enabled land.

q) There is no additional cost to the Council in re-zoning the Site as there is expected to be capacity in the public utilities and the existing road network, including planned upgrades.

r) Amendments to PWDP objectives and policies may be necessary to provide for a higher density LLRZ, but of themselves will not act against those relating to Strategic Directions Urban Form and Development and Urban Growth. The PWDP approach to zones and
identification of future development land is already out of step with higher order Resource Management Act 1991 (RMA) statutory documents because they do not give effect to the NPS-UD (and are sought to be amended through this submission).

s) The alternatives of retaining Rural Lifestyle or Large Lot Residential zone across the entire Site are not an efficient use of land which immediately adjoins the urban area of Rangiora, and is highly accessible to the town centre by active transport modes as well as car.

t) The proposed rezoning is consistent with and the most appropriate, efficient and effective means of achieving the purpose of the RMA.

The Site

1. The Site is a 58ha block of land (‘the Site’) accessed from Lehman Road, Rangiora **(Figure 1)**. It is owned by the two submitters and 12 other landowners.

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1 Assumes 20% of land area taken for servicing including roading, reserves and stormwater management if required.

Figure 1: The site (outlined in blue (Google Earth)

2. The Site is surrounded by RLZ land that is used for a mix of lifestyle and conventional farming. To the NE is the Rangiora Eco Holiday Park, and beyond the Park is the Rangiora Racecourse about 300m away from the nearest lot and 1km from the centre of the Site. Land to the south east is GRZ and part of urban Rangiora with newly developing residential land west of West Belt. About 1.9 km to the NW is Rangiora Airfield. About 1km north of the most northern lot is the Ashley River.
3. The southern-most lot in the proposal with the Rangiora Vet Clinic faces, but does not have access to Rangiora-Oxford Road (State Highway 72). This arterial road provides the main road connection in to the centre of the town. The well-established Fernside Rural residential area is about 2.5km west from the junction of Lehmans and Rangiora-Oxford Roads.

Figure 2: the site is a broader context (Site marked red)

4. The Site is not identified as lying within a preferred growth direction for Rangiora in the Waimakariri 2048 District Development Strategy (2018) (**WDDS**) **(Figure 3)**. No land west of Lehmans Road is included in the West Rangiora Development Area (**DEV-WR**) in the PWDP.

Figure 3: Figure 11 WDDS

5. The Council reviewed its strategic approach to the location and provision of Rural Residential land (now zoned LLRZ in the PWDP) in the WDSS. It adopted the position that it would:

a) Explore tools such as cluster development to manage rural character

b) For rural residential development, adopt an approach that has a primary focus on creating new rural residential areas, with a secondary focus on enabling large lot intensification within existing rural residential areas where there is sufficient community support and servicing available

c) Review the Rural Residential Development Plan for the whole District (pg 21 WDDS).

6. Rangiora presently has a population of 17,841 (2018 Census). It grew steadily between 2006 and 2018. Growth of Rangiora since then has continued in step with the district growth which has increased 8.2% between 2018 and 2021 from 61,300 to 66,300 at an annual average of 2.8% from 2018 to 2020 (Statistics NZ Subnational population projections at 30 June 2021: provisional).

2006 (count)	**2013 (count)**	**2018 (count)**
12,165	15,069	17,841

Statistics NZ

Population projections at 30 June

PLANNING STATUS OF THE SITE

Chapter 6 of the Canterbury Regional Policy Statement

7. An assessment of the CRPS is set out in **Appendix 1** to this submission.
8. The Site is within the Greater Christchurch area.
9. It was not shown as a Greenfield Priority Area – Residential (GPA) on Map A of the Canterbury Regional Policy Statement (CRPS). The GPA terminates at Lehmans Road.
10. As a result of the Minister for the Environment's decision of 28 May 2021 on Change 1 to Chapter 6, an area largely south of Oxford Road and a finger of land to the north of Oxford Road was included as a Future Development Area (**FDA**) (**Figure 4** orange).

Figure 4: Map A Chapter 6 Regional Policy Statement Greenfield Priority areas
Site location identified with red circle (appx)

11. The FDAs are intended to accommodate the increased demand for new dwellings in that part of Waimakariri District within the Greater Christchurch Urban Area and to respond to the NPS-UD. They do not provide "plan enabled" land as they need to negotiate a rezoning process to confirm their status as land developable for housing and other urban purposes.
12. The proposal for a LLRZ zone with average lot sizes of 1500m2 is inconsistent with the policy approach of Chapter 6 for Greater Christchurch, in that if fits none of the residential living typologies provided for in Chapter 6 and is not in a location identified for urban or rural residential development. It sits 'between' the urban and rural residential densities provided for in the CRPS (minimum 10 hh/ha for urban in Waimakariri, and average 1-2 hh/ha for rural residential). The proposed density is appx. 6.66 hh/ha.
13. Notwithstanding, the proposal meets all the location and other criteria in CRPS Policy 6.3.9 for rural residential development. It is:

- Outside the CIAL noise contours
- Has some sites with restrictions from the take-off and landing vectors for Rangiora Airfield but not such as to impact its operational capacity.
- Is outside the groundwater protection zone
- Is not within the Waimakariri stop bank system
- Has no views of or to the Port Hills
- Has good access for emergency services
- Will not create reverse sensitivity issues with adjoining land uses; Rangiora Racecourse is 500m away.
- Free of significant natural hazards and is a flat site.
- Supports no significant natural values or ecological values.
- Contains no SASMs.
- Can be integrated into or consolidated with the existing urban area of west Rangiora.
- Contains no surface water bodies so there will be no adverse impacts on these.
- The development will be contingent on an ODP to provide integrated design for subdivision and land use, and provide for the long-term maintenance of a high quality high density rural residential character.
- The proposal is not intended as a staged development towards full urban; rather it is intended to provide a unique residential environment that can stand alone and contribute to the urban fabric of Rangiora like Palmview in east Rangiora, or as Kaiapoi Lakes does for Kaiapoi.

14. Overall, the proposal is not consistent with Chapter 6 but that is more a function of its original purpose when formulated in 2013. Notwithstanding that, the submission for a lower density residential focussed, high quality urban environment that attaches to an existing urban area and that promotes a coordinated pattern of development has planning merit.

Operative Waimakariri District Plan
15. The Site is zoned Rural in the Operative Plan. The minimum lot size for subdivision and a dwelling is 4 ha.
Proposed Waimakariri District Plan
16. The Site is zoned Rural Lifestyle Zone **(LRZ) (Figure 4).** The minimum lot size for subdivision and a dwelling in the LRZ is 4 ha.
17. Oxford Road is a strategic road and Lehmans Road is a collector road.

Figure 5: Proposed District Plan Zoning (site outlined in red)

18. The Site is also subject to, or potentially influenced by, a number of Overlays:
    a) Rangiora Airfield Take Off Climb and Approach Obstacle Limitation Surface (**Figure 6**)
    b) National Grid Transmission Lines (**Figure 6**)
    c) Liquefaction: Liquefaction damage is unlikely (**Figure 6**)
    d) Non-Urban Flood Assessment Area (**Figure 7**)
    e) Geographic areas: Ecological Area – Plains

f) Ecological District – Low Plains

Figure 6: Rangiora Airfield Take-off and Approach vectors (blue dashed lines); Liquefaction damage unlikely (green)Transmission lines (green lines); Site outlined in red

Figure 7: Non-urban flood assessment & Waimakariri Flood Hazard maps
Blue – medium risk, green – low risk, white – very low

DEVELOPMENT PROPOSAL AND PROPOSED REZONING

19. Subdivision of the Site will create approximately 311 LLRZ D2 lots.
20. The key design drivers for the proposal are:

a) A high amenity premier residential zone with large houses on large sites – average 1500m^2, min 1000m$_2$ based on the St Kilda, Hamilton development concept (**Figure 8**).

b) LLRZ D2 standards would enable a lower density zone in the medium term e.g. 10 years to achieve a high quality consistent character subdivision. If developed as an integrated development subject to an ODP subdivision can be staged for to the proposal.

c) Creating strong connections with the immediate neighbourhood by providing a cohesive interconnected roading layout that picks up direct links to the eastern neighbourhood off Lehmans Road and the northern subdivision roading, and carries them into the Site.

d) Creating a high amenity and diverse residential neighbourhood by providing interfaces to roads, reserves and rural environments.

e) Respecting and building on local identity and character of Rangiora by retaining specific vegetation features from the Site, and anchoring the development into the wider landscape.

21. A development concept can provide for sound urban design by:

a) A hierarchy of movement corridors.

b) Prioritisation of walking and cycling.

c) A north-south alignment of street blocks to maximize solar access and provide for efficient use of lots.

d) Block perimeters being kept as small as practicable to aid permeability and higher public amenity.

e) Enabling a range of housing typologies set in high quality landscape and street setting with generous amenity plantings and curtilage.

Figure 8: St Kilda development images (Bayleys)

22. St Kilda, Cambridge is a premier development on the outskirts of Cambridge, centrally located and with easy access to the Waikato Expressway. It was originally part of a small dairy operation which was dissected by the Waikato Expressway, leaving a portion within the Cambridge Town boundary and the larger balance of the property of approximately 80 ha (which became St Kilda) on the Eastern side of the Expressway, left in the Rural Zone.
23. The initial development concepts were for a Rural Residential type development given the Expressway separation of the existing residential development on the Western side of the Cambridge Bypass, however this was not supported by Council and a new concept of larger residential sections of a 1600m² average size was developed and approved – see https://www.stkilda.nz/page/location/

EFFECTS ON THE ENVIRONMENT

Township growth and urban form

24. The Site immediately adjoins the western edge of urban Rangiora.
25. The WDDS indicated a general preference for the direction of urban growth of Rangiora to the east as a way of balancing up the residential areas around the town centre and some growth to the west.
26. The approach of the WDDS was to signal growth options to be confirmed in the District Plan Review:

The broad directions for greenfield residential growth for the District's main towns are set out in Figures 11 to 14. Further work will be carried out to identify and confirm the exact locations and extent of these residential growth areas, together with the intensification opportunities within existing urban areas. These will be enabled through the District Plan Review and other planning tools.

27. The Strategic Planning documents clearly signal active consideration of growth needs and growth directions. The options available to the Council were constrained by the approach of the CRPS as the District Plan has to give effect to the CRPS and cannot be
inconsistent with it. The CRPS took effect in 2013 and is overdue for review.
28. The CRPS tightly holds urban growth to the constraints of Map A Chapter 6 and the identified FDAs which although amended by Plan Change 1 in 2020 does not respond to the directions of the NPS-UD. In any event the approach is focused on the need for housing in full urban residential land, less on other residential development forms.
29. As such the Site falls outside the planning policy framework for urban growth. However, in terms of urban form and on the ground, there is considerable merit and logic to conversion of this existing LRZ land to a new high amenity residential form that can be integrated into the Rangiora urban fabric.
30. The proposal has the potential to anticipate the longer term growth path confirmed by the decisions on the RRS to protect the future growth option of more intensive urban development in this direction. It can set a pathway to further westward expansion on land
that holds few if any physical barriers to land development.
31. The proposal will contribute to the housing needs of Rangiora and in a form and location that does not undermine the long run urban form of Rangiora. Planned growth confirmed in the PWDP is already intended to extend westwards out to Lehmans Road and to keep the town edge squared up providing depth to future development and providing a rational basis for providing movement networks driven off the key roads such as Rangiora-Oxford Roads. The West Rangiora Future Development Area confirms this approach. The Site sits in the next block west of Lehmans Road so is not proposing a disjointed urban form, nor one that is not part of the long term thinking of urban form and growth for Rangiora.

32. A full residential zoning is proposed under LLRZ D2 and will provide a high quality street character, overall amenity and passive surveillance over the street, and will create the correct lighting standards, roading standard, fully formed footpaths and cycleways required for a high quality urban environment.

Neighbourhood and wider community effects
33. The Site is serviced by a collector road and is close to an arterial road. This provides for ease of access and safe and convenient movement to and from the Site. A planned development co-ordinated by an ODP can facilitate within the site movement corridors and linkages through the Site to provide for walking and cycling.
34. A key positive neighbourhood and community effect will arise from the existing dwellings and their established gardens and plantings that will anchor new development and provide a point of reference for new dwellings. Development will not be on a bare site; it will take place in an existing established part-residential setting. The transition to a low density, high quality premier residential development will start from a favourable position and minimise the apparent extent and nature of the landscape change.
35. The Site is comparatively large (58.4 ha) and has the potential to support a variety of residential building typologies and this will contribute to a mix of households within the development and provide built form variety and interest in the streetscape. Whilst LLR D2 standards are proposed, it may be that part of the Site is suitable for other higher density forms of development, which would be within scope of the alternative relief, and could be considered as part of the master planning process required for preparation of an ODP (ahead of the hearing). The earlier stages of the St Kilda development were for large lot residential, with more clusters of townhouses included as later stages (and a retirement village). A retirement village is unlikely in this case, given the proximity of the Charles Upham Retirement Village.
36. Rangiora is well-positioned to accommodate and service the needs of a fast-growing resident population that will in turn support more business activity, schools, community facilities and community organisations.

Effects on tangata whenua values
37. The Proposed District Plan does not identify any Sites and Areas of Significance to Maori in the Site, but the nearby Rakahuri/Ashely River identified as SASM-025. This has been scheduled as being
River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species
38. The PWDP has Policy SASM-P8 which is relevant to pre-development processes:
Engagement with rūnanga
Te Ngāi Tūāhuriri Rūnanga and the District Council to encourage engagement with the Rūnanga priorto persons undertaking activities and/or applying for resource consent where the activity has thepotential to adversely affect identified sites or areas of Ngāi Tūāhuriri cultural significance. Where priorengagement with Te Ngāi Tūāhuriri Rūnanga h as not been undertaken by an applicant for an activitythat has the potential to adversely affect an identified site, the District Council will consult with the Rūnanga.
39. The Site is not listed as an archaeological site on the NZ Archaeological Site database.

Landscape and visual effects
40. Rural Lifestyle style development exists on the Site now (a series of 4 ha lots with a dwelling and associated accessory buildings on each). The landscape is dominated by shelter belts, utility buildings, significant trees and planted curtilages around

dwellings many of which are well set back off the roads down RoWs.
41. An ODP will help to achieve an integrated, cohesive and coherent development The proposal will lead to a modification of the landscape of the Site from a predominantly lifestyle block landscape to a denser semi-urban environment dominated by residential building that will, in time, get the benefit of street tree and reserve plantings and landscape treatments around the houses.
42. The visual effects which will arise from a change in the number of vegetative and built elements in the landscape are significant, but not avoidable, if the Site is to contribute to the on-going growth of Rangiora. The change will contribute to a high quality amenity and quality of environment and one that will be entirely consistent with and supportive of the rural lifestyle residential development that has successfully established on the Site.

Well-functioning urban environments
43. The Site adjoins the existing built up urban area of Rangiora. Immediately to the east are existing or developing residential areas.
44. The conversion of the Site from present rural lifestyle uses to low density, high quality residential will continue a pattern of outward expansion of Rangiora. Such a change may not be consistent with the PWDP's identification of a Future Development Overlay for west Rangiora only as far west as Lehmans Road, but on the ground it will look and integrate as part of the urban fabric.
45. It will provide some replacement lower density living areas for the existing LLR zones at north west Rangiora – but at much more appropriate higher density that the LLR D1 standard which is 1-2 hh/ha. There are two such areas, shown on the planning maps below. River Road has an 'urban overlay' and is intended to be intensified to urban densities. The land on the opposite (east) side of Lehmans Road is a 'legacy' rural residential zoning which applies under the Operative District Plan. The landowners have developed the adjoining residential subdivision and wish to develop the land for full urban residential development. Services are in place to support this. The constraint to date has been Map A of the CRPS which does not include the land as a Greenfield Priority Area or Future Development Area, GR zoning of this land is consistent with the NPS-UD.

Figure 9: PWDP as notified – LLRZs shown in light grey. Diagonal stripes – urban growth overlay.
Site outlined in red.
46. Rangiora is growing apace. It is attracting significant interest from new home buyers as people respond to the significant investment in upgraded transport links (Northern Corridor and public transport) and a growing economic base for employment within the District and the City.
47. Rangiora has excellent connectivity to the City, both via the new Northern Corridor, and a nascent cycleway link into the City. There is a very regular bus service every half hour.(the No 1 Blue Line) The standard trip takes 70 minutes, and there is a twice daily weekday morning express service from Rangiora, and seven times weekday express out to Rangiora all via Kaiapoi.
48. The Site will step out the western edge of Rangiora, but as it exists in a peri-urban form now, such a change does not alter how the Site interacts with Rangiora as a whole. It is in many ways a functional part of urban Rangiora now; it's only the Zone boundaries and policy framework that create the sense of it not being part of Rangiora.
49. The Site is convenient to the Rakihura/ Ashley recreation trails, the racecourse, Arlington Park, and the airfield. The town centre is easily accessible.
50. The following assessment of the criteria in the NPS-UD for determining a well-functioning urban environment shows that the proposed rezoning will deliver urban, housing and residential outcomes that meet those criteria. There will be a variety of homes enabled by generous lot sizes. The Site is well-positioned, building as it does on an existing township well-serviced by public transport and cycling options, to provide good accessibility to jobs, community services, and open spaces, as well as mitigating climate change impacts and future natural hazards by being not near the coast and well removed from major rivers.

NPS-UD Policy 1

Planning decisions contribute to well functioning urban environments, which are urban environments that, as a minimum:	**Assessment**

(a) have or enable a variety of homes that: (i) meet the needs, in terms of type, price, and location, of different households; and (ii) enable Māori to express their cultural traditions and norms;	The proposal is to have larger lots supporting predominantly standalone dwellings and associated accessory buildings (including generous sized garaging) in an open landscaped garden setting. This will fill a gap in the range of housing typologies available at Rangiora and contribute to a better functioning urban environment overall at Rangiora. It is not necessary for each individual rezoning proposal to have a wide range of housing typologies, and in some circumstances this may not be appropriate. The rezoning will deliver a premier high amenity urban subdivision with generous sized lots which will complement existing and planned higher density residential development at west Rangiora. There is scope with the relief sought for a mix of residential densities. The appropriateness of this can be considered at the master planning/ODP stage. The Site has the potential to create a unique urban environment in Rangiora. It can follow the example of Palmview based on a lake or Kaiapoi Likes providing a niche housing option in Rangiora and the District meeting a need for residential land not constrained to GRZ standards.
(b) N/A business sectors	
(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and	The Site has access to a collector road and a strategic road providing easy access to key community amenities and facilities. The town is served by a public bus route to the city, and a cycle trail connecting to Kaiapoi and the City. The new West Rangiora Development Area adjoins the Site to the south. The Site will become closer to Rangiora public transport routes as they extend out to service this new growth area over time. The Site is in walking distance to Arlington Park and the Rakahuri/Ashley which contains abundant recreations pace. It is easily accessible to the town centre and within walking distance to the Huntingdon Drive local centre.
(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and	The demand for housing and land in Rangiora is largely ahead of the planning means to respond. This proposal will “top up” the land presently set aside in the PWDP and provide a useful buffer to demand. The Site owners have been keen to release this land for more intense development for some time; there is no prospect of land banking.
(e) support reductions in greenhouse gas emissions; and	The Site has significant advantages in being easily accessible to the town centre and reserves, community facilities and schools. The proposal retains a consolidated form to Rangiora with good connectivity and linkages to recreation space and commercial centres reducing the need for car travel.
(f) are resilient to the likely current and	The Site is within the area of influence of a major river but the non-urban flood assessment maps do not show extensive flooding likely at the Site.

future effects of climate change	Being inland it is not at risk from climate change induced extreme natural hazard events like sea level rise. or river flooding.

Effects on ecosystems and habitats

51. The Site is currently used for a mix of low intensity (grazing) farming, and lifestyle purposes. Shelter belts and utility buildings have been established

52. The Site has been identified in the PWDP with two ecological overlays (the PWDP ecological overlay – Plains and Low Plains Ecological District). They are a district-wide overlays and no specific ecological values have been identified in the Proposed Waimakariri District Plan. These overlays seek primarily to retain indigenous vegetation. The PWDP identifies SASM 025 nearby the Site. That is a Site and Area of Significance to Maori and in SASM - Schedule 1 is identified as *being River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species.*

Effects on natural and physical resources

53. The Site drains in a SE direction towards the newly developing residential area.

54. There will be a degree of site disturbance as part of creating the roading network, and reserves, and as part of curtilage development on each lot.

55. The proposed use for residential activity inevitably leads to loss of some rural productive potential as land owner intentions are not about farming or productive use of the land, but lifestyle use and enjoyment. Built forms and hard surfaces become more dominant.

56. The Site comprises 4ha bocks now and these are not able to be used effectively for productive purposes other than for intensive productions based on tunnel housing and other supported production systems. None exist in the Site now.

57. The Site contains Class 2 and Class 3 soils as defined in the NZ Land Use Inventory (Landcare Research) Land Use Capability classes 1-3 **(Figure 10)**. Productive use of these soils other than for low level purposes i.e. grazing, is not feasible given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production).

Figure 10: Site soils: Site outlined in red; (Canterbury Maps)
Class 2 soils: bright green/Class 3 soils: light green;

Discharges of contaminants into the environment

58. There will be no discharges of contaminants into the environment. Wastewater will discharge to the Council's reticulated system.

59. Stormwater discharges will potentially be to ground given ground conditions or to an approved and consented stormwater management and treatment area which will meet all relevant Council standards.

Risks from natural hazards or hazardous installations

60. The PWDP planning maps show the Site as being within a Non-Urban Flood Assessment Area.

61. The District Plan maps do not identify high flood hazard areas or high coastal flood hazard areas, rather these are identified through the flood assessment certification process. This enables the most up-to-date technical information to be used. However, as a guide, areas that are potentially high hazard can be identified through the Waimakariri District Natural Hazards Interactive Viewer (NH - Introduction).

62. Rules that refer to a Flood Assessment Certificate require a certificate to be obtained from the District Council to determine compliance with the relevant rule. The alternative is to apply for resource consent as set out in the rule.

63. Rule NH-R2 states
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;

64. Assessment of flood risk and consequence can be undertaken at subdivision stage.

65. There will be no hazardous installations proposed on the Site.

Geotechnical assessment
66. The PWDP planning maps show the Site as being “Liquefaction damage is unlikely. Standard investigation procedure outlined in NZS3604 is appropriate”.

Contaminated land
67. A Preliminary Site Investigation can be carried out for the Site at subdivision stage.
68. An enquiry of ECAN has identified that two sites at the northern end of the Site potentially contain some contaminated land, which can be investigated further at subdivision stage **(Appendix 6)**. 315 Lehmans Road is an unverified HAIL site (previous use for clay target shooting) and 317 is registered as containing uninvestigated persistent pesticide bulk storage.

Servicing
69. Proposals for servicing the Site and the effects from such servicing in relation to domestic water supply, wastewater, stormwater, roading, and telecommunications will be required for any subdivision consent.

Economic effects
70. It is anticipated that urban development will generate positive economic effects, both from the investigation/development phase and for the longer run economic activity from householders participating in the local economy.

Climate Change effects
71. An assessment of the effects of the proposed rezoning on climate change is included as part of the assessment of a well-functioning urban environment above.
72. A well-functioning urban area that is designed and serviced in an integrated manner, applying sound urban design principles, will enable a reduction in greenhouse gas emissions compared to unplanned, ad hoc development that does not create compact urban forms located where the services and benefits of existing, established urban areas are not readily accessible.
73. There is a triangle of planning influence that can be brought to bear on reducing greenhouse gas emissions
a) Compact urban form minimising distances between homes and work/play options.
b) Proximity of homes to community facilities, services and amenities and business/work areas.
c) Design and provision of movement corridors and linkages that create opportunities other than for vehicles for getting around.
74. The Site of the proposed rezoning:
a) Helps in retaining a compact urban form to Rangiora.
b) Is easily accessible to the town centre and is located convenient to the recreation resources of the nearby Rakahuri/Ashley River, the airfield and racecourse and Arlington Park.
75. Rangiora has excellent connectivity to the City, both via the Northern Motorway, the new Northern Corridor, a cycle way link to Kaiapoi which is linked to the new north city cycle way along the Northern Corridor and a very regular bus service.

Positive effects
76. The proposed rezoning will provide for the continued growth of Rangiora by managing the development through an ODP. The proposal will provide a buffer to on-going high level demand for lots in Rangiora. It will cater for a specific housing need not found in GRZ Zoned land nor LLRZ land. The proposed rezoning is anticipating a form of development that is a much more efficient use of a qualifying site supporting a well-functioning urban area. It is a positive endorsement of Rangiora as a growth node in the District.
77. The benefits derived from a planned ODP approach include facilitating high levels of connectivity, creating community links to identified focal points. The Site is close to recreation facilities. A coordinated and integrated development will provide a distinctive environmental quality and point of difference to the development.
78. The Site adjoins existing and developing residential development on the western edge of Rangiora.
79. From a community well-being perspective, the provision of additional land for residential growth will continue to support the Council’s investment in community infrastructure by maintaining and facilitating growth rates, increasing the rating base and attracting development contributions.

STATUTORY PLANNING ASSESSMENT
80. Submissions must be assessed under the provisions of the RMA, including Part 2 and Section 32 (Requirements for Preparing Evaluation Reports).

National Policy Statements
National Policy Statement on Urban Development Capacity (NPS-UD)

81. The NPS–UD applies to this proposal as it is directed at Tier 1 urban environments, and Tier 1 local authorities which includes Waimakariri District as part of the Christchurch urban environment that is defined in Table 1 of the NPS, and additionally defined as:

any area of land (regardless of size, and irrespective of local authority or statistical boundaries) that: is, or is intended to be, predominantly urban in character; and is, or is intended to be, part of a housing and labour market of at least 10,000 people.

82. The NPS-UD recognises the national significance of:

a) Having well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future; and

b) Providing sufficient development capacity to meet the different needs of people and communities.

83. The NPS outcomes are to be achieved through objectives that address:

a) Planning decisions improving housing affordability by supporting competitive land and development markets.

b) Regional policy statements and district plans enabling more people to live in areas of urban environments near centres or areas with employment opportunities, area well serviced by public transport or a high demand for housing in the area.

c) Urban environments developing and changing over time in response to diverse and changing needs of people, communities and future generations.

d) Local authority decisions on urban development being integrated with infrastructure planning and are strategic over the medium term and long term.

e) Local authority decisions on urban development are responsive particularly for proposals supplying significant development capacity.

f) New Zealand's urban environments support reductions in greenhouse emissions and are resilient to current and future effects of climate change.

84. The key method to achieve these objectives is by development of a Future Development Strategy (FDS). This will set out how the Councils will provide for sufficient development capacity over the next 30 years to meet expected demand. There is no FDS for the greater Christchurch Urban Area that meets the requirements of the NPS-UD.

85. Work on development capacity completed for the NPS - UDC 2016 by the Greater Christchurch Partnership as an Update of the existing Urban Development Strategy (UDS) – Our Space 2019 confirmed what there was a shortage of feasible development capacity for future housing in Waimakariri District for the medium (next 10 years) and long term (10 to 30 years) periods. That assessment is now out of date as it does not address the requirements of the NPS-UD; and rates of take up of land have exceeded projected rates.

86. One of the key changes in the NPS-UD is that local authority decisions on urban development that affects urban environments are responsive, particularly to proposals that would supply significant additional capacity. It also amends the required methodology for housing and business capacity assessments.

87. The current CRPS does not meet the new NPS-UD requirement in relation to proposals for significant additional capacity. Regional councils are required to include criteria in the RPS to determine what plan changes will be treated for the purposes of Policy 8 as adding significantly to development capacity as soon as practicable. ECAN has yet to respond to this requirement.

88. The NPS-UD has immediate effect, so in the meantime, proposals such as this submission must be assessed in the context of the overall intent and purpose of the NPSUD as articulated in the NPS-UD objectives and policies. This includes that NZ has well-functioning environments; provides sufficient development capacity to meet the different needs of people and communities; planning decisions improve housing affordability to contributing to competitive house and land markets; and RMA plans enable more people to live near major employment areas, where there is existing or planned public transport, and where there is high demand for housing.

89. The NPS-UD is the higher order document and its requirements override those of lower order documents where there is a conflict, including regional and district RMA plans.

90. Key objectives and policies in the NPS-UD are assessed here:

NPS-UD Objective/Policy	**Assessment**
Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	The proposed development will further enable Rangiora to sustain itself as a well-functioning urban environment by consolidating the residential area close to the town centre, and provide residential development close to public transport links and existing community and commercial facilities including Huntingdon Drive local centre. The proposal provides choices in the Rangiora housing market and in doing so

Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.	supports housing affordability. Whilst the proposal is for a premier larger lot urban residential development, it is important that all sectors of the market are catered for. This will be more affordable than forcing those wanting large sections out to the much larger and very limited areas of LLR D1 development, or having to purchase 2-3 sections in a standard residential subdivision. There Site is in multiple ownership and the landowners are working together to achieve the rezoning. It will bring more competition into the market by bringing new entrants into the market.
Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply: the area is in or near a centre zone or other area with many employment opportunities the area is well-serviced by existing or planned public transport there is high demand for housing or for business land in the area, relative to other areas within the urban environment.	The CRPS is due for review in 2024 but in the meantime the existing CRPS is not in accordance with the NPS-UD 2020. The proposed rezoning is on the edge of the District's largest centre, which offers a wide range of community and business services, and employment opportunities. It is expected that a proportion of future residents will commute outside the township, but as the township and associated business areas e.g. at Southbrook, continue to grow, this is expected to become proportionally less. Rangiora is well serviced with public transport, there is scope for future mass transit PP, and there is a high demand for housing at Rangiora. The Site adjoins the new West Rangiora Development Area, to the south. Extensions of public transport to service this growth area will be readily accessible to the Site.
Objective 6: Local authority decisions on urban development that affect urban environments are: integrated with infrastructure planning and funding decisions; and strategic over the medium term and long term; and responsive, particularly in relation to proposals that would supply significant development capacity.	Whilst not currently identified as a future growth area in RMA documents, the Site is well placed at the township edge to be serviced by existing infrastructure. Some upgrades may be required, which will be investigated further with Council prior to the hearing. See Policy 8 below for commentary on proposals which supply significant development capacity
Objective 8: New Zealand's urban environments: support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change	The proposal adjoins the existing built up are of Rangiora, close to public transport links. Its excellent accessibility to Christchurch City, substantially enhanced with the new Northern Motorway extensions, means it is now highly accessible to these nearby major employment areas. Travel distances are relatively short, minimising vehicle miles and the potential for greenhouse gas emissions. There is a cycleway link from into Christchurch City, and regular bus services, including an express route. The Site is inland and not subject to natural hazard risks associated with sea level rise arising from climate change.
Policy 1 – Planning decisions for well-functioning urban environments	Assessed at para 41-50
	The proposed rezoning is anticipated to provide sections that will be available for the short term (up to 3 years) and into the medium term (3-10 years) if adopting a more conservative outlook.

Policy 2 - Sufficient development capacity Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.	The locational and amenity advantages of Rangiora also favour strong ongoing demand. The PWDP UFD-O1 Feasible Development Capacity for residential activities identifies the need for 6300 residential units in the period 2018-2028, and 7100 residential units 2028-2048. These numbers are derived from Chapter 6 CRPS Table 6.1. and are out of date. Data from the Council (November 2021) confirms that there are about 800 vacant lots in Rangiora. Building consents are at about 180/year. That means there is about 4 years vacant land supply. A lead in time of 3-5 years is needed to go from rezone to house build so the Council is facing an unnecessary squeeze on land availability. That will translate in to an upward shift in land and section prices as has been the case at Rolleston. The data suggests that the PWDP will be late to the party to ensure there is at least sufficient development capacity to meet expected demand for housing land over the short term, medium term, and long term. There is a looming, inevitable land supply issue so any proposal to add capacity will push the Council closer to meeting the requirements of the NPS-UD. The proposal is consistent with ensuring there is at least sufficient land supply for housing.
Policy 8 – Responsiveness to plan changes Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is: (a) unanticipated by RMA planning documents; or (b) out-of-sequence with planned land release	The proposed rezoning is not anticipated by RMA documents - it is not a Greenfield Priority or Future Development Area in the CRPS, or a New Development area in the PWDP. A responsive approach to the proposal is required as it meets the Policy 8 criteria for unanticipated zoning. It will contribution to well functioning urban environments and will add significant development capacity. There is no development capacity for the housing typology proposed – so any provision is significant in this context. The development will deliver appx 311 high amenity large lot residential sites at an average density of 1500m2. This will be higher if a mix of densities are proposed, which may be appropriate in some parts of the Site, dependent on master planning work to follow.

91. Adopting the submission to re-zone the land, and enable the proposed development on the submission Site will satisfy the objectives and policies of the NPS-UD.

Proposed National Policy Statement for Highly Productive Land (NPS-HPL)

92. The Government proposed in 2019 a NPS-HPL to prevent the loss of productive land and promote its sustainable management. The overall purpose of the proposed NPS-HPL is to improve the way highly-productive land is managed under the Resource Management Act 1991 (RMA) to:

a) Recognise the full range of values and benefits associated with its use for primary production
b) Maintain its availability for primary production for future generations
c) Protect it from inappropriate subdivision, use, and development.

93. The NPS-HPL is still a proposal and not intended to take effect until after Gazettal. At the date of this submission the NPS-HPL has no effect and no assessment of it is required for the purposes of this submission.

94. The Proposed NPS-HPL interim definition of HPL is land defined as Land Use Capability Class 1-3 soils. A portion of the Site contains Class 2 and 3 soils (see **Figure 10)**. Highly productive use of these soils is not realistic given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production). Its present use as lifestyle blocks, low level grazing and agistment is the more likely long run use of the Site if not rezoned.

95. Objective 3 of the Proposed NPS-HPL specifically refers to highly productive soils being protected by avoiding *"uncoordinated urban expansion on highly productive land that has not been subject to a strategic planning process"*.

The Site was assessed through a strategic planning process (WDDS 2018) and the RRS as a preferred site for LLRZ development, and rejected for a change in zoning on the basis that it may be required for long term urban growth of Rangiora.
96. It is therefore considered that this submission to re-zone the Site is largely in accordance with the Proposed NPS-HPL.

National Planning Standards

97. The National Planning standards prescribe various matters under the RMA so that there is consistency among planning documents most relevantly here in terms of appellations for zones, and the standards applying to these zones.
98. The proposed rezoning adopts the standard zone appellation, in this case LLRZ as contained in the PWDP.
99. The PWDP identifies plan standards for minimum and average net site areas for the respective zones. These are modified for the proposed rezoning as a higher density LLRZ.
100. The higher density LLR zoning is entirely consistent with the NPS purpose for the LLRZ as reproduced below. In this case, the principal constraint to more intensive development is the peri-urban location where a lower density transition to the rural environment is appropriate (particularly noting that the zone boundary is 'mid block' so there is no natural or physical buffer between rural and residential areas); the existing pattern of 4 ha lots with existing substantial homes and gardens; and the fact that the premier large lot subdivision proposed relies on consistency of housing quality and character to be deliver on this vision for the area.

Large lot residential zone

Areas used predominantly for residential activities and buildings such as detached houses on lots larger than those of the Low density residential and General residential zones, and where there are particular landscape characteristics, physical limitations or other constraints to more intensive development.

Low density residential zone

Areas used predominantly for residential activities and buildings consistent with a suburban scale and subdivision pattern, such as one to two storey houses with yards and landscaping, and other compatible activities.[2]

Canterbury Regional Policy Statement 2013 (CRPS)

101. Chapter 6 of the RPS *"provides a resource management framework for the recovery of Greater Christchurch, to enable and support recovery and rebuilding, including restoration and enhancement, for the area through to 2028. Recovery in Greater Christchurch is also supported by the provisions in Chapter 5 notated as 'Entire Region'. The provisions in the remainder of the RPS also apply.3"*
102. An assessment of the proposed rezoning against the relevant CRPS Objectives and Policies is set out in **Appendix 1**. This should be read in the context of the CRPS being overdue for review and that it does not provide a regional response to the NPS-UD. The
need to focus on earthquake recovery has now passed and so many of the directive provisions need to be given appropriate 'weight' in a new national policy environment with a focus on flexible, responsive panning approaches that better provide for people's needs and well-being.
103. That assessment shows that

a) The development proposal achieves the objectives for the location, design and function of new developments (Objective 5.2.1)

b) The traffic effects of the proposal are unlikely to give rise to adverse effects and so achieves CRPS objectives for the strategic land transport network (Policy 5.3.7)

c) The Site falls outside the FDAs shown on Map A of Chapter 6 and in that regard is inconsistent with RPS Policy 6.2.1 clauses 1 to 3.

1. identifies priority areas for urban development within Greater Christchurch;

2. identifies Key Activity Centres which provide a focus for high quality, and, where appropriate, mixed-use development that incorporates the principles of good urban design;

3. avoids urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS

d) The environmental effects assessment outlined above establish that the proposed development is consistent and will not give rise to any concerns with respect to all the matters listed in RPS Policy 6.2.1 clauses 4. to 11. These matters are:

6.2.1 Recovery framework

Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that:

1. As above;

2. As above;

3. As above;

4. protects outstanding natural features and landscapes including those within the Port Hills from inappropriate subdivision, use and development;

5. protects and enhances indigenous biodiversity and public space;
6. maintains or improves the quantity and quality of water in groundwater aquifers and surface waterbodies, and quality of ambient air;
7. maintains the character and amenity of rural areas and settlements;
8. protects people from unacceptable risk from natural hazards and the effects of sea-level rise;
9. integrates strategic and other infrastructure and services with land use development;
10. achieves development that does not adversely affect the efficient operation, use, development, appropriate upgrade, and future planning of strategic infrastructure and freight hubs;
11. optimises use of existing infrastructure; and
12. N/A

e) The proposed rezoning achieves policies relating to:
- Sustainability;
- Integration of transport infrastructure and land use;
- Urban design; and
- Biodiversity, natural hazards, landscape, soils, contaminated land.

104. In terms of the CRPS polices for rural residential developments (Policy 6.3.9) the proposal sits square with all policy matters other than being a location identified in an adopted Rural Residential Strategy; and being at a higher density than provided for under this policy (ie greater than 1-2 hh/ha). As such it has a majority of features entirely consistent with the policy.
105. The CRPS includes housing capacity targets as below

6.2.1a Targets for sufficient, feasible development capacity for housing [inserted in accordance with sections 55(2) and 55(A) of the Resource Management Act 1991, from the National Policy Statement on Urban Development Capacity 2016]
For the period 2018-2048, sufficient, feasible development capacity for housing is enabled in Greater Christchurch in accordance with Table 6.1.
Table 6.1 Targets for housing development capacity in Greater Christchurch, 2018-2048

106. These derive from Our Space, under the requirements of the then NPS-Urban Development Capacity 2016, since replaced by the NPS-UD 2020. The targets (known as bottomlines in the NPS-UD) are to be treated as 'minimums' not 'maximums'.
Policy 6.3.12
enables urban development in the Rangiora and Kaiapoi FDAs (new Development Areas in the PWDP) where needed to meet the medium term targets. This a 'minimum' allocation approach contrary to the NPS-UD. The NPS-UD favours over allocation, including in locations unanticipated by RMA plans, where it will add additional development capacity, can be integrated with infrastructure planning and funding, and will contribute to well functioning urban environments – as is the case the proposed Lehmans LLR D2 zone.
107. The proposed Lehmans LLR D2 zone is consistent with the CRPS except with respect to those parts of the CRPS which are out of step with and do not give effect to the higher order plan, the NPS-UD.

Proposed Waimakariri District Plan
108. An assessment of this proposal against the relevant PWDP Objectives and Policies for urban growth and development as notified on 17 September 2021 is set out in **Appendix 2.**
109. That assessment shows that the proposed rezoning is entirely consistent with the relevant objectives and policies, including as sought to be amended by this submission. Those amendments are to UFD-P3 Identification/location and extension of Large Lot Residential Zone areas; and LLRZ-O1 and LLRZ- P1-5 and reflect the intent and outcomes intended for the proposed LLRZ D2 zone, which is a higher density LLRZ zone than the PWDP LLRZ zone (renamed LLRZ D1 in this submission).

ASSESSMENT AGAINST OTHER PLANNING DOCUMENTS
Our Space 2018-2048 Greater Christchurch Settlement Update (2019)
110. Our Space is a non-statutory document prepared under the Local Government Act. It
"responds to the new Government Policy Statement on Land Transport, which has increased funding for mass public transit schemes, and meets the requirement of the National Policy Statement on Urban Development Capacity (NPS-UDC) 2016 to prepare a
future development strategy…. Specifically, it:
• sets out how targets for housing for the next 30 years will be met, accommodating an additional 150,000 people;
• identifies locations for housing growth, encouraging Central City and suburban centre living while providing for township growth in Rolleston, Rangiora and Kaiapoi;…

• *promotes a compact urban form, which provides for efficient transport and locates development in a manner that takes into account climate change and sea level rise.[4].*

..Underpinning this settlement pattern approach is the vision for a transformation of the transport network that fosters much greater public and active transport usage, and reduced reliance on the private vehicle.

111. Our Space acknowledges that this will require commitment from the Government to invest in the necessary improvements to our transport system, which could include investing in rapid transit services. To date, there has been no successful business case for improved public transportation, including not as a Covid 19 fast track infrastructure project.

112. The Our Space housing capacity targets (Table 3) and Future Development Areas are related to growth of urban areas.

113. Our Space, like the CRPS (and the Operative District Plan) are now out of date, as they do not reflect or give effect to the new requirements of the NPS-UD.

Waimakariri 2048 District Development Strategy (WDDS)

114. The preferred growth directions for Rangiora in the WDDS 2048 (2018) are outlined above (under 'Site') i.e. westwards to Lehmans Road, and otherwise eastwards. However, the Council in its decision on the RRS, recognized west of Lehmmans Road as a potential longer town urban growth area.

115. The WDDS Rangiora Snapshot (pp38-39) -when looking ahead to 2048 proposed that:

a) Rangiora remains the District's largest town
b) 30,000 – estimated population (2048)
c) 12,025 – estimated households
d) 5,025 - new households in Rangiora
e) Continues to accommodate one third of the District's residential growth
f) 167 – estimated annual building consents for new dwellings for the next 30 years
g) 423 hectares of additional feasible residential land required by 2048 (this includes capacity in remaining stages of existing residential developments as well as new greenfield areas inside and outside of the Infrastructure Boundary)
h) Future residential growth directions proposed to the east (predominantly) and west of the current town
i) Opportunities for intensification/regeneration to be identified
j) New growth directions take into account areas of unacceptable natural hazard risk and areas of significant environmental and cultural values
k) New growth areas to connect into existing sewer and water networks
l) Stormwater Levels of Service designed to meet increased performance requirements

116. At the 2018 Census Rangiora had a population of 17,841, and 7314 total dwellings (incl those unoccupied and under construction). Population projections for the District show an average annual change 2018-2020 of 1700 persons. If Rangiora continues to attract a third of all district growth as stated in the WDSS then Rangiora's population in 2021 will be around 18,900.

Mahaanui Iwi Management Plan

117. Part 1 of the PWDP in a section "Mana Whenua" sets out the position with respect to iwi and the review of the district Plan:

a) The District's territorial area sits within the takiwā (territory) of Ngāi Tūāhuriri which is one of eighteen Ngāi Tahu regional papatipu rūnanga, constituted under the ***Te Rūnanga o Ngāi Tahu Act 1996*** *to represent* ***mana whenua*** *interests.*

b) The preparation and change of a district plan must take into account relevant iwi documents. For the District, Ngāi Tahu has set out its resource management values, issues, objectives and policies within the Mahaanui Iwi Management Plan (2013).

c) The Mahaanui Iwi Management Plan identifies objectives, issues and policies for natural resource and environmental management for six pāpatipu rūnanga (including Te Ngāi Tūāhuriri Rūnanga). It seeks to ensure that the taonga and resources of Ngāi

Tahu mana whenua are recognised and protected in the decision-making of statutory agencies. The Mahaanui Iwi Management Plan contains a comprehensive suite of policies and objectives addressing the range of resource management matters of significance to tangata whenua. The District Council shall have regard to the Mahaanui Iwi Management Plan when preparing or changing the District Plan, to the extent its content has a bearing on resource management issues of the District.

118. The Mahaanui Iwi Management Plan (MIMP) 2013 was released on 1 March 2013.

119. The MIMP is a tool for tangata whenua to express their identity as manawhenua and their objectives as kaitiaki, to protect their taonga and resources, and their relationships with these. The MIMP seeks to ensure that these taonga and resources are recognised and protected in the decision-making of agencies with statutory responsibilities to tangata whenua. Importantly it is also a tool

that assists Papatipu Rūnanga representatives to articulate their values, issues and policy into statutory processes.
120. The MIMP includes both general objectives and policies about the management of land, air, and water, and also includes catchment specific objectives and policies.
121. Section 5.3 Wai Maori (pp77-98) contains an extensive discussion about tangata whenua rights and interests in freshwater. It provides a suite of Issues, Objectives and Policies for freshwater
122. Section 5.4 Papatuanuku (pp101-124) sets out the Ngai Tahu Subdivision and Development Guidelines that are to be read along-side objectives relating to:

a) Land use planning and management in the takiwā reflects the principle of Ki Uta Ki Tai. (from the mountains to the sea)

b) Rural and urban land use occurs in a manner that is consistent with land capability, the assimilative capacity of catchments and the limits and availability of water resources.

c) Inappropriate land use practices that have a significant and unacceptable effect on water quality and quantity are discontinued.

d) Ngāi Tahu has a prominent and influential role in urban planning and development.

e) Subdivision and development activities implement low impact, innovative and sustainable solutions to water, stormwater, waste and energy issues.

123. Section 5.5 Tane (pp127-137) includes objectives that focus on:
a) Regional policy, planning and decision making in the takiwā reflects the particular interest of Ngāi Tahu in indigenous biodiversity protection, and the importance of mahinga kai to Ngāi Tahu culture and traditions.
b) The customary right of Ngāi Tahu to engage in mahinga kai activity is recognised, protected and enhanced…
c) Customary use, and therefore mahinga kai, is given effect to as a first order priority for freshwater management in the takiwā.
124. Section 6.4 (pp213-224) addresses issues of particular significance to the lands and waters of the Waimakariri catchment within which the Site lies.
125. Relevant Objectives relating to urban development of land in that catchment include:

a) The natural "energy, vitality and life" of the Waimakariri River as a braided river is protected and restored.

b) The discharge of contaminants to the Waimakariri and its tributaries is eliminated.

c) Water quality and flows in the Waimakariri and its tributaries are improved to enable whānau and the wider community to have places they can go to swim and fish.

d) The mauri and mahinga kai values of the Waimakariri and its tributaries and associated springs, wetlands and lagoons are protected and restored; mō tātou, ā, mō kā uri ā muri ake nei.

126. A key issue relating to subdivision and development is that subdivision and development activities in the lower catchment have the potential to adversely affect Ngāi Tahu values such as waterways, mahinga kai and sites of significance (Issue Wai4).
127. The proposal provides for full urban reticulation of the three waters and is consistent with the objectives and policies contained in Chapters 5.3 and 5.4 of the MIMP. The proposal does not preclude individual land owners from installing rainwater collection and use from roof areas at the time of building development.
128. The proposal has been designed taking into consideration the potential effect of resultant subdivision and development on the rivers and streams that flow into the lowland rivers.
129. Overall it is considered that the proposal will not have adverse impact on the cultural values of iwi as set out within the MIMP.

SECTION 32 ASSESSMENT

130. A Section 32 assessment is contained in **Appendix 3.**
131. In summary, the PWDP zoning and associated rules (RLZ Zone with a minimum lot size for subdivision and a dwelling 4ha) do not meet the needs and aspirations of the current owners.
132. Strategic Council planning documents (specifically the WDDS) have a focus on only meeting urban growth demands within urban environments of existing towns. They favour intensification (15hh/ha) and a strict allocation of capacity by development areas. It is a control and command regime consistent with Map A of Chapter 6 of the CRPS but is out of step with the requirements of the NPS-UD which requires a more flexible, responsive approach, prohibits a hard fixed unmoveable urban/rural boundary.
133. This approach leaves little room for new proposals or proposals that do not sit square with the standard array of GRZ/medium density or SETZ (Settlement Zone). SETZ applies to some of the District's smaller settlements outside Greater Christchurch.
134. Neither LRZ nor Large Lot Residential (LLRZ) as notified in the PWDP is an efficient use of this block of land located as it is immediately adjoining the urban area of Rangiora, and in a location easily accessible to the town centre by active transport modes as well as car and several district reserves.
135. If this Site is not zoned for LLRZ D2 (minimum average lot size 1500m^2) use to enable residential re-development then it will drive pressure to re-zone elsewhere. That step potentially will not have the significant benefits to Rangiora long term in relation to enabling a well-functioning urban environment that enables people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future. Additionally re-zoning to LLRZ D2 will contribute to providing additional development capacity to meet the different needs of people and communities in a planned manner and

consistent with the NPS-UD.
136. The Site can readily be developed to reflect the principles of the Urban Design Protocol with values of character, context, and connectivity.
137. The Section 32 assessment concludes that the proposal to re-zone the Site from LRZ zone to LLRZ D2 Zone (average lot size 1500m$_2$) is the most appropriate method for achieving the objectives of the proposal, than the other alternatives considered.
138. Option 2 identified in the s 32 assessment is consistent with some PWDP policies notwithstanding that it does sit square with the strategic intentions signaled in the WDDS and the PWDP approach to providing for development capacity and urban development.
139. Option 2 identified in the s 32 assessment to re-zone the Site is the most appropriate given:

a) The proposals adopt the PWDP zones, development and activity standards with appropriate amendments. This ensures continuity of the District Plan anticipated environmental outcomes and urban amenity for Rangiora and adjoining residential areas;

b) Will be consistent with and give effect to many of the relevant PWDP objectives and policies;

c) It is a logical extension to the developed and developing residential land adjoining the Site while achieving a compact, efficient urban form that removes pressure on isolated rural land elsewhere around Rangiora.

d) It gives effect to the NPS-UD, specifically Objective 6 c) and Policy 8, delivering significant additional development capacity and contributing to a well functioning urban environment.

e) It is assumed that there will be capacity in the public utilities and the existing road network, including planned upgrades, to accommodate the traffic effects of the redevelopment;

f) The proposed Site specific ODP will provide certainty of the final form and disposition of the re-zoned area including its proposals for reserves, roading, future linkages for pedestrian and vehicular traffic.

140. The re-zoning proposal is considered to be appropriate to achieve the sustainable growth and development of Rangiora.
141. The economic, social and environmental benefits of the proposed rezoning outweigh any potential costs.
142. The overall efficiency and effectiveness of the proposed rezoning (Option 2) is high, in comparison to the alternative options set out in the s 32 Assessment which are low (Options One and Four) or low to moderate (Option Three).
143. The PWDP proposes to release land for development in the new Development Areas at Rangiora and Kaiaipoi through a novel and untested certification process that is not clearly derived from RMA statutory powers, nor Local Government Act 2002 (LGA) authority. This approach is not proposed for the LLR Overlay areas. As the proposed Lehmans Road LLR D2 zone proposed by this submission seeks large lot urban densities, it is anticipated that Council may favour the certification process if it accepts the proposed rezoning. This is opposed – rezoning to LLRZ D2 is sought.
144. Potential difficulties with the proposed certification process are identified and discussed in the Section 32 Assessment. (**Appendix 3)**. In summary, the process is hugely discretionary, does not provide conventional rights to an applicant (eg right of objection/appeal) meaning decisions cannot be challenged, and it is not apparent that the process will be appropriately documented with a transparent record of the decision-making within the certification process. Further uncertainty arises in the practicalities of how to negotiate and manage the staging, funding and building of key infrastructure across a range of Sites, and a risk that land supply is controlled by a limited number of large developers. It is a far less efficient and effective method for delivering land for housing than the Council rezoning the land in the PWDP.
145. The proposed rezoning is considered to be the most appropriate, efficient and effective means of achieving the purpose of the RMA.

CONSULTATION

146. The landowners and their consultants have submitted on the WRRS and the WDDS (**Appendix 4)**.
147. The submissions to re-zone as rural residential or identify the Site as suitable for LLRZ have been rejected as noted above. LLRZ but at higher densities as now proposed is considered to be a more efficient use of the land and better meets market demand. 5000m^2 sites provide more land is needed for a spacious home and garden.
148. The landowners have been consistent in their wish to find a zone and possible land uses better suited to their needs.

CONCLUSION

173 The submission seeks to rezone 58 ha of land adjoining Rangiora from Lifestyle Rural Zone (LRZ) to Large Lot Residential with a specific density standard (LLRZ D1), minimum average lot size 1500m^2.
149. The Site has a long history of rural lifestyle use. It is not significantly restricted by potential natural hazards especially flooding, nor does it have physical limitations for development for residential purposes as it is not liquefaction prone, and has no known geotechnical limitations but does contain an area of LUC 2 soils. It is near a site of significance to iwi (SASM – 025) being the Rakahuri/Ashley River The Site has access to a collector road and is near to a strategic road giving direct access to the town centre and a range of community amenities and facilities.
150. The Site immediately adjoins the urban area of Rangiora, and is well located to join in to Council utility services. It is well suited for conversion to residential use.
151. The Site is not identified within the westward growth direction for Rangiora in the District Development Strategy 2018 nor is

it part of the DEV-WR development area which adopts Lehmans Road as its western boundary. It is in a location that achieves coherent and compact urban form offering ease of access to business services, community facilities, reserves and the primary road network.
152. The proposed rezoning provides for a connected and high amenity residential living environment not presently available under the PWDP while avoiding and/or mitigating any potential adverse effects on the environment. It will provide for continuing high demand for a variety of high quality residential sections aimed at a particular segment of the housing market in an ideal location, easily accessible to the existing town centre services and facilities. It will broaden the range of housing available. As such, it is consistent with the NPS-UD including Objective 6c) and Policy 8, to be responsive to proposals which supply significant development capacity and contribute to a well functioning urban environment.
153. The use of this Site for residential purposes can be a sustainable and efficient use of land and infrastructure. The proposed rezoning better provides for the social, economic, environmental well-being of the landowners and the Rangiora community than continuation of the current low intensity lifestyle land use on 4ha blocks, or a conventional LLRZ residential use.
154. Any potential adverse effects of the implementation of the proposed rezoning can be assessed at subdivision stage but there has been no restriction on servicing the blocks to date. Capacity will need to be confirmed for infrastructure, power and road network. Any future subdivision of the Site will need to confirm water supply and wastewater treatment and disposal options.
155. Rezoning of the site to LLRZ zone is not inconsistent with the policies and objectives of the PWDP, but it is at odds with the dated CRPS approach to provision of urban growth and housing capacity for Greater Christchurch, to the extent that it is not within an FDA created by Change 1 to the CRPS and is not identified as an LLRZ site under the strategic RRS prepared by the Council.
156. As the proposal helps achieve the purpose of the RMA, and has been shown to be consistent with the relevant provisions of the NPS-UD, the submission can be accepted by Waimakariri District Council.

Original Submission

Summary Reasons for the Submission

The reasons for our submission are outlined below.
a) The preferred relief (**the proposed rezoning**) is both appropriate and necessary to achieve sustainable growth and development of Rangiora and the District and meet the requirements of the National Policy Statement for Urban Development 2020 (**NPS-UD**).
b) The Site identified in Figure 1 and at para 1 of the Preferred Relief above is a logical and preferred location that lends itself to a specific type of housing development not provided within the PWDP as a residential option adjoining but outside the existing urban areas. Nowhere is it possible to develop in a comprehensive, coordinated way a low density, high quality residential environment in the District's towns, the Rural Lifestyle Zone or Settlement Zone as a permitted activity.
c) The requirement for 12/15 hh/ha in GRZ zones (the majority of land in urban areas) drives development to modern scale relatively small urban lots best produced as a package across a significant land holding. The GRZ subdivision standards do not provide for the needs of people who seek a generous sized urban lot residential setting. This is a housing sector that is running against the planning tide of intensification but is, nonetheless, a legitimate form of housing in an appropriate setting. The barriers to such development in urban areas requires an appropriate setting/ location in the rural areas but close to or adjoining the urban areas and at a much lower density than is desired or appropriate (the PWDP LLRZ) to meet the housing needs for generous sized urban lot residential living..
d) The PWDP subdivision standards for LLRZ require lots that are very large for those whose primary interest in a rural setting is a form of residential living, not one that requires significant maintenance and management often involving animals or machinery at scale. Conversely, the GRZ subdivision standards do not provide for the needs of people who seek a large lot residential setting
e) The focus in the PWDP is on prescribing a limited range of residential options and tightly controlling and constraining housing choice within those options. Further urban growth is also tightly constrained and controlled around DEV areas around Rangiora and Kaiapoi but for a very specific form of residential development driven off density requirements that do not match the needs of all landowners.
f) The focus in most new District Plans, driven in part by the National Planning standards, is to simplify the range of zones, to standardize lot sizes, to supposedly create efficiency and certainty through ease of administration of the District Plans. This is done by constraining housing and land development choices by lot size, by location, by built standards and the disposition of built/open elements in a site. However, the National Planning standards do provide for large lot urban residential living, a residential living option which has not been taken up the PWDP (due most likely to the restrictive provisions of the CRPS which only prescribe one from of lower density residential living, at a density of 1-2 hh/ha).
g) This planning approach may be a standard approach to resource allocation but it does not provide a flexible, responsive

approach to innovative and new development options. The Government is creating policy settings that on one hand seek intensification in urban areas, while at the same time pushing away from a land allocation model of planning. The PWDP in striving to face both policy directions has a package of measures that are in fact a major barrier in terms or cost, timeframes and certainties for proposals that are not cut from the suite of housing and development options set out by the PWDP. The allocation of land in preferred development areas, it must be said, runs counter to the Government's push, and now its direction, to free up land for development, to encourage innovation in housing (presently with a focus of intensification) and to make available a range of responses to the need to meet the housing needs of people and communities set out in the NPS-UD.

h) While the weight of demand (and the planning response) is around affordable housing, around small lots and dense development that supports investment in public facilities and amenities such as public and active transport, reserves, and commercial services, there is always a wide spectrum of preferences at play in the housing market. The demand for high quality, generous houses set on generous sized parcels of land within high amenity settings is an important and no less relevant housing sector. There is a strong unmet demand, as confirmed by advice from Bayleys real estate (**Appendix 5**) for larger family homes with room for a pool or similar. Purchasers want to be close the amenities of Rangiora and within walking and cycling distance of local schools. They do not want the only available options – a 4 ha lifestyle block or 5000m^2 rural residential site at Mandeville or Ohoka.

i) Interestingly enough for a nation built on the so-called quarter acre paradise, recent policy and planning interest in housing and land development has now seemingly positioned the 1011m^2 section as a luxury item, as the antithesis of providing for community well-being and needs. It is as though the old quarter acre of itself acts against building a sense of community despite being able to be developed in a planned, structured, coordinated or integrated manner. Rather than being a frivolous discretionary item in land development
and housing choice, a well-planned, well located and properly serviced low density residential environment has much to offer urban environments. They can be tactically used to provide shape and edge to urban areas, they can provide a mass of amenity different from (and potentially complementary to), but no less legitimate in urban outcome terms, to conventional GRZ zoned land.

j) In many ways the approach of a district plan to the role and place of the old quarter acre is not dissimilar to the issues faced by comprehensive retirement villages when first proposed. The idea of dense, almost gated and self-contained communities, with multi storey buildings also did not sit well in many district plans. But now they are accepted as an important part of the urban fabric catering to a specific demographic and health demographic. Most plans enable them.

k) Provision for low density residential in an urban setting, or failing that likelihood, in an adjoining rural zone is a fundamental gap in the district plan.

l) The submission seeks to provide for another housing typology not provided in the PWDP and in a location with significant planning merit. The planning case was made out in a detailed submission to the proposed Rural Residential Strategy (**RRS**) for the land identified in this submission to be "reserved" for conventional Rural Residential zoning in the review of the District Plan. That submission was rejected in favour of a decision ascribing an unspecific strategic significance to Lehmans Road as the urban boundary; simply the decision was that rural residential development here would preclude this area as a future urban growth path, even though this was likely to be very long term as the Waimakariri District Development Strategy (WDDS 2018) for the period up to 2048, does not favour urban growth west of Lehmans Road.

Officer Recommendation

Continue to exclude the area west of Lehmans Road and the racecourse land at Rangiora as growth areas as these were originally considered but not included in the draft RRDS as they trigger the key preliminary criteria of: being on the direct edges of a main town outside of the Projected Infrastructure Boundary (PIB) thereby foreclosing more intensive long-term urban development, and…

Panel Recommendation

The panel accepted the officer recommendations to exclude areas on the fringes of Rangiora in the final RRDS due to these having the potential to foreclose more intensive long-term urban development of the town.

m) In light of the above decision on the Waimakariri Rural Residential Strategy, the proposal now is for a form of high amenity low density urban zoning, which whilst in demand is entirely absent from the PWDP. This will be a long term urban form of development. The proposal set out in the submission will achieve a compact, and efficient, urban form on the edge of Rangiora with excellent connectivity by multiple transport modes. It provides for continuous urban development by enabling a built form which can act as a strong zone or urban boundary.

n) The proposed rezoning will accommodate approximately 311 LLRZ lots1 at the proposed amended density standards for LLRZ D2 (average size 1500m^2). It will contribute to a well-functioning urban environment, meeting the NPS-UD Objective 6(c).

o) Any adverse effects on the environment arising from the proposed rezoning will be minimal, if any, and can be adequately mitigated. A high amenity master planned development is proposed.

p) Significant positive effects arise from the proposed rezoning. It will enable the short term housing demand at Rangiora to be met, and can deliver a housing typology for which there is demand, on lots that are not a burden to the landowners (which is the case for 4ha and the very limited areas of LLRZ D1 with a density of 1-2 hh/ha) and for which there is no provision in the PWDP. At present rates of land uptake there is about 4 years vacant land supply in Rangiora. Given it takes 3-5 years to bring land from zoned state to on the market as developed lots, there is some urgency in providing additional capacity. This proposal helps address an anticipated shortfall in residential zoned plan enabled land.
q) There is no additional cost to the Council in re-zoning the Site as there is expected to be capacity in the public utilities and the existing road network, including planned upgrades.
r) Amendments to PWDP objectives and policies may be necessary to provide for a higher density LLRZ, but of themselves will not act against those relating to Strategic Directions Urban Form and Development and Urban Growth. The PWDP approach to zones and
identification of future development land is already out of step with higher order Resource Management Act 1991 (RMA) statutory documents because they do not give effect to the NPS-UD (and are sought to be amended through this submission).
s) The alternatives of retaining Rural Lifestyle or Large Lot Residential zone across the entire Site are not an efficient use of land which immediately adjoins the urban area of Rangiora, and is highly accessible to the town centre by active transport modes as well as car.
t) The proposed rezoning is consistent with and the most appropriate, efficient and effective means of achieving the purpose of the RMA.

The Site
1. The Site is a 58ha block of land ('the Site') accessed from Lehman Road, Rangiora **(Figure 1)**. It is owned by the two submitters and 12 other landowners.

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1 Assumes 20% of land area taken for servicing including roading, reserves and stormwater management if required.

Figure 1: The site (outlined in blue (Google Earth)

2. The Site is surrounded by RLZ land that is used for a mix of lifestyle and conventional farming. To the NE is the Rangiora Eco Holiday Park, and beyond the Park is the Rangiora Racecourse about 300m away from the nearest lot and 1km from the centre of the Site. Land to the south east is GRZ and part of urban Rangiora with newly developing residential land west of West Belt. About 1.9 km to the NW is Rangiora Airfield. About 1km north of the most northern lot is the Ashley River.
3. The southern-most lot in the proposal with the Rangiora Vet Clinic faces, but does not have access to Rangiora-Oxford Road (State Highway 72). This arterial road provides the main road connection in to the centre of the town. The well-established Fernside Rural residential area is about 2.5km west from the junction of Lehmans and Rangiora-Oxford Roads.

Figure 2: the site is a broader context (Site marked red)

4. The Site is not identified as lying within a preferred growth direction for Rangiora in the Waimakariri 2048 District Development Strategy (2018) (**WDDS**) **(Figure 3)**. No land west of Lehmans Road is included in the West Rangiora Development Area (**DEV-WR**) in the PWDP.

Figure 3: Figure 11 WDDS

5. The Council reviewed its strategic approach to the location and provision of Rural Residential land (now zoned LLRZ in the PWDP) in the WDSS. It adopted the position that it would:

a) Explore tools such as cluster development to manage rural character

b) For rural residential development, adopt an approach that has a primary focus on creating new rural residential areas, with a secondary focus on enabling large lot intensification within existing rural residential areas where there is sufficient community support and servicing available

c) Review the Rural Residential Development Plan for the whole District (pg 21 WDDS).

6. Rangiora presently has a population of 17,841 (2018 Census). It grew steadily between 2006 and 2018. Growth of Rangiora since then has continued in step with the district growth which has increased 8.2% between 2018 and 2021 from 61,300 to 66,300 at an annual average of 2.8% from 2018 to 2020 (Statistics NZ Subnational population projections at 30 June 2021: provisional).

2006 (count)	2013 (count)	2018 (count)
12,165	15,069	17,841

Statistics NZ

Population projections at 30 June

PLANNING STATUS OF THE SITE

Chapter 6 of the Canterbury Regional Policy Statement

7. An assessment of the CRPS is set out in **Appendix 1** to this submission.
8. The Site is within the Greater Christchurch area.
9. It was not shown as a Greenfield Priority Area – Residential (GPA) on Map A of the Canterbury Regional Policy Statement (CRPS). The GPA terminates at Lehmans Road.
10. As a result of the Minister for the Environment's decision of 28 May 2021 on Change 1 to Chapter 6, an area largely south of Oxford Road and a finger of land to the north of Oxford Road was included as a Future Development Area (**FDA**) (**Figure 4** orange).

Figure 4: Map A Chapter 6 Regional Policy Statement Greenfield Priority areas
Site location identified with red circle (appx)

11. The FDAs are intended to accommodate the increased demand for new dwellings in that part of Waimakariri District within the Greater Christchurch Urban Area and to respond to the NPS-UD. They do not provide "plan enabled" land as they need to negotiate a rezoning process to confirm their status as land developable for housing and other urban purposes.
12. The proposal for a LLRZ zone with average lot sizes of 1500m2 is inconsistent with the policy approach of Chapter 6 for Greater Christchurch, in that if fits none of the residential living typologies provided for in Chapter 6 and is not in a location identified for urban or rural residential development. It sits 'between' the urban and rural residential densities provided for in the CRPS (minimum 10 hh/ha for urban in Waimakariri, and average 1-2 hh/ha for rural residential). The proposed density is appx. 6.66 hh/ha.
13. Notwithstanding, the proposal meets all the location and other criteria in CRPS Policy 6.3.9 for rural residential development. It is:

- Outside the CIAL noise contours
- Has some sites with restrictions from the take-off and landing vectors for Rangiora Airfield but not such as to impact its operational capacity.
- Is outside the groundwater protection zone
- Is not within the Waimakariri stop bank system
- Has no views of or to the Port Hills
- Has good access for emergency services
- Will not create reverse sensitivity issues with adjoining land uses; Rangiora Racecourse is 500m away.
- Free of significant natural hazards and is a flat site.
- Supports no significant natural values or ecological values.

• Contains no SASMs.
• Can be integrated into or consolidated with the existing urban area of west Rangiora.
• Contains no surface water bodies so there will be no adverse impacts on these.
• The development will be contingent on an ODP to provide integrated design for subdivision and land use, and provide for the long-term maintenance of a high quality high density rural residential character.
• The proposal is not intended as a staged development towards full urban; rather it is intended to provide a unique residential environment that can stand alone and contribute to the urban fabric of Rangiora like Palmview in east Rangiora, or as Kaiapoi Lakes does for Kaiapoi.

14. Overall, the proposal is not consistent with Chapter 6 but that is more a function of its original purpose when formulated in 2013. Notwithstanding that, the submission for a lower density residential focussed, high quality urban environment that attaches to an existing urban area and that promotes a coordinated pattern of development has planning merit.

Operative Waimakariri District Plan

15. The Site is zoned Rural in the Operative Plan. The minimum lot size for subdivision and a dwelling is 4 ha.

Proposed Waimakariri District Plan

16. The Site is zoned Rural Lifestyle Zone **(LRZ) (Figure 4).** The minimum lot size for subdivision and a dwelling in the LRZ is 4 ha.
17. Oxford Road is a strategic road and Lehmans Road is a collector road.

Figure 5: Proposed District Plan Zoning (site outlined in red)

18. The Site is also subject to, or potentially influenced by, a number of Overlays:
a) Rangiora Airfield Take Off Climb and Approach Obstacle Limitation Surface (**Figure 6**)
b) National Grid Transmission Lines (**Figure 6**)
c) Liquefaction: Liquefaction damage is unlikely (**Figure 6**)
d) Non-Urban Flood Assessment Area (**Figure 7**)
e) Geographic areas: Ecological Area – Plains
f) Ecological District – Low Plains

Figure 6: Rangiora Airfield Take-off and Approach vectors (blue dashed lines); Liquefaction damage unlikely (green)Transmission lines (green lines); Site outlined in red

Figure 7: Non-urban flood assessment & Waimakariri Flood Hazard maps
Blue – medium risk, green – low risk, white – very low

DEVELOPMENT PROPOSAL AND PROPOSED REZONING

19. Subdivision of the Site will create approximately 311 LLRZ D2 lots.
20. The key design drivers for the proposal are:
a) A high amenity premier residential zone with large houses on large sites – average 1500m^2, min 1000m$_2$ based on the St Kilda, Hamilton development concept (**Figure 8**).
b) LLRZ D2 standards would enable a lower density zone in the medium term e.g. 10 years to achieve a high quality consistent character subdivision. If developed as an integrated development subject to an ODP subdivision can be staged for to the proposal.
c) Creating strong connections with the immediate neighbourhood by providing a cohesive interconnected roading layout that picks up direct links to the eastern neighbourhood off Lehmans Road and the northern subdivision roading, and carries them into the Site.
d) Creating a high amenity and diverse residential neighbourhood by providing interfaces to roads, reserves and rural environments.
e) Respecting and building on local identity and character of Rangiora by retaining specific vegetation features from the Site, and anchoring the development into the wider landscape.

21. A development concept can provide for sound urban design by:
a) A hierarchy of movement corridors.
b) Prioritisation of walking and cycling.
c) A north-south alignment of street blocks to maximize solar access and provide for efficient use of lots.

d) Block perimeters being kept as small as practicable to aid permeability and higher public amenity.
e) Enabling a range of housing typologies set in high quality landscape and street setting with generous amenity plantings and curtilage.

Figure 8: St Kilda development images (Bayleys)

22. St Kilda, Cambridge is a premier development on the outskirts of Cambridge, centrally located and with easy access to the Waikato Expressway. It was originally part of a small dairy operation which was dissected by the Waikato Expressway, leaving a portion within the Cambridge Town boundary and the larger balance of the property of approximately 80 ha (which became St Kilda) on the Eastern side of the Expressway, left in the Rural Zone.
23. The initial development concepts were for a Rural Residential type development given the Expressway separation of the existing residential development on the Western side of the Cambridge Bypass, however this was not supported by Council and a new concept of larger residential sections of a 1600m² average size was developed and approved – see https://www.stkilda.nz/page/location/

EFFECTS ON THE ENVIRONMENT

Township growth and urban form

24. The Site immediately adjoins the western edge of urban Rangiora.
25. The WDDS indicated a general preference for the direction of urban growth of Rangiora to the east as a way of balancing up the residential areas around the town centre and some growth to the west.
26. The approach of the WDDS was to signal growth options to be confirmed in the District Plan Review:
The broad directions for greenfield residential growth for the District's main towns are set out in Figures 11 to 14. Further work will be carried out to identify and confirm the exact locations and extent of these residential growth areas, together with the intensification opportunities within existing urban areas. These will be enabled through the District Plan Review and other planning tools.
27. The Strategic Planning documents clearly signal active consideration of growth needs and growth directions. The options available to the Council were constrained by the approach of the CRPS as the District Plan has to give effect to the CRPS and cannot be
inconsistent with it. The CRPS took effect in 2013 and is overdue for review.
28. The CRPS tightly holds urban growth to the constraints of Map A Chapter 6 and the identified FDAs which although amended by Plan Change 1 in 2020 does not respond to the directions of the NPS-UD. In any event the approach is focused on the need for housing in full urban residential land, less on other residential development forms.
29. As such the Site falls outside the planning policy framework for urban growth. However, in terms of urban form and on the ground, there is considerable merit and logic to conversion of this existing LRZ land to a new high amenity residential form that can be integrated into the Rangiora urban fabric.
30. The proposal has the potential to anticipate the longer term growth path confirmed by the decisions on the RRS to protect the future growth option of more intensive urban development in this direction. It can set a pathway to further westward expansion on land
that holds few if any physical barriers to land development.
31. The proposal will contribute to the housing needs of Rangiora and in a form and location that does not undermine the long run urban form of Rangiora. Planned growth confirmed in the PWDP is already intended to extend westwards out to Lehmans Road and to keep the town edge squared up providing depth to future development and providing a rational basis for providing movement networks driven off the key roads such as Rangiora-Oxford Roads. The West Rangiora Future Development Area confirms this approach. The Site sits in the next block west of Lehmans Road so is not proposing a disjointed urban form, nor one that is not part of the long term thinking of urban form and growth for Rangiora.

32. A full residential zoning is proposed under LLRZ D2 and will provide a high quality street character, overall amenity and passive surveillance over the street, and will create the correct lighting standards, roading standard, fully formed footpaths and cycleways required for a high quality urban environment.

Neighbourhood and wider community effects

33. The Site is serviced by a collector road and is close to an arterial road. This provides for ease of access and safe and convenient movement to and from the Site. A planned development co-ordinated by an ODP can facilitate within the site

movement corridors and linkages through the Site to provide for walking and cycling.
34. A key positive neighbourhood and community effect will arise from the existing dwellings and their established gardens and plantings that will anchor new development and provide a point of reference for new dwellings. Development will not be on a bare site; it will take place in an existing established part-residential setting. The transition to a low density, high quality premier residential development will start from a favourable position and minimise the apparent extent and nature of the landscape change.
35. The Site is comparatively large (58.4 ha) and has the potential to support a variety of residential building typologies and this will contribute to a mix of households within the development and provide built form variety and interest in the streetscape. Whilst LLR D2 standards are proposed, it may be that part of the Site is suitable for other higher density forms of development, which would be within scope of the alternative relief, and could be considered as part of the master planning process required for preparation of an ODP (ahead of the hearing). The earlier stages of the St Kilda development were for large lot residential, with more clusters of townhouses included as later stages (and a retirement village). A retirement village is unlikely in this case, given the proximity of the Charles Upham Retirement Village.
36. Rangiora is well-positioned to accommodate and service the needs of a fast-growing resident population that will in turn support more business activity, schools, community facilities and community organisations.

Effects on tangata whenua values
37. The Proposed District Plan does not identify any Sites and Areas of Significance to Maori in the Site, but the nearby Rakahuri/Ashely River identified as SASM-025. This has been scheduled as being
River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species
38. The PWDP has Policy SASM-P8 which is relevant to pre-development processes:
Engagement with rūnanga
Te Ngāi Tūāhuriri Rūnanga and the District Council to encourage engagement with the Rūnanga priorto persons undertaking activities and/or applying for resource consent where the activity has thepotential to adversely affect identified sites or areas of Ngāi Tūāhuriri cultural significance. Where priorengagement with Te Ngāi Tūāhuriri Rūnanga h as not been undertaken by an applicant for an activitythat has the potential to adversely affect an identified site, the District Council will consult with the Rūnanga.
39. The Site is not listed as an archaeological site on the NZ Archaeological Site database.

Landscape and visual effects
40. Rural Lifestyle style development exists on the Site now (a series of 4 ha lots with a dwelling and associated accessory buildings on each). The landscape is dominated by shelter belts, utility buildings, significant trees and planted curtilages around dwellings many of which are well set back off the roads down RoWs.
41. An ODP will help to achieve an integrated, cohesive and coherent development The proposal will lead to a modification of the landscape of the Site from a predominantly lifestyle block landscape to a denser semi-urban environment dominated by residential building that will, in time, get the benefit of street tree and reserve plantings and landscape treatments around the houses.
42. The visual effects which will arise from a change in the number of vegetative and built elements in the landscape are significant, but not avoidable, if the Site is to contribute to the on-going growth of Rangiora. The change will contribute to a high quality amenity and quality of environment and one that will be entirely consistent with and supportive of the rural lifestyle residential development that has successfully established on the Site.

Well-functioning urban environments
43. The Site adjoins the existing built up urban area of Rangiora. Immediately to the east are existing or developing residential areas.
44. The conversion of the Site from present rural lifestyle uses to low density, high quality residential will continue a pattern of outward expansion of Rangiora. Such a change may not be consistent with the PWDP's identification of a Future Development Overlay for west Rangiora only as far west as Lehmans Road, but on the ground it will look and integrate as part of the urban fabric.
45. It will provide some replacement lower density living areas for the existing LLR zones at north west Rangiora – but at much more appropriate higher density that the LLR D1 standard which is 1-2 hh/ha. There are two such areas, shown on the planning maps below. River Road has an 'urban overlay' and is intended to be intensified to urban densities. The land on the opposite (east) side of Lehmans Road is a 'legacy' rural residential zoning which applies under the Operative District Plan. The landowners have developed the adjoining residential subdivision and wish to develop the land for full urban residential development. Services are in place to support this. The constraint to date has been Map A of the CRPS which does not include the land as a Greenfield Priority Area or Future Development Area, GR zoning of this land is consistent with the NPS-UD.

Figure 9: PWDP as notified – LLRZs shown in light grey. Diagonal stripes – urban growth overlay.
Site outlined in red.

46. Rangiora is growing apace. It is attracting significant interest from new home buyers as people respond to the significant investment in upgraded transport links (Northern Corridor and public transport) and a growing economic base for employment within the District and the City.

47. Rangiora has excellent connectivity to the City, both via the new Northern Corridor, and a nascent cycleway link into the City. There is a very regular bus service every half hour.(the No 1 Blue Line) The standard trip takes 70 minutes, and there is a twice daily weekday morning express service from Rangiora, and seven times weekday express out to Rangiora all via Kaiapoi.

48. The Site will step out the western edge of Rangiora, but as it exists in a peri-urban form now, such a change does not alter how the Site interacts with Rangiora as a whole. It is in many ways a functional part of urban Rangiora now; it's only the Zone boundaries and policy framework that create the sense of it not being part of Rangiora.

49. The Site is convenient to the Rakihura/ Ashley recreation trails, the racecourse, Arlington Park, and the airfield. The town centre is easily accessible.

50. The following assessment of the criteria in the NPS-UD for determining a well-functioning urban environment shows that the proposed rezoning will deliver urban, housing and residential outcomes that meet those criteria. There will be a variety of homes enabled by generous lot sizes. The Site is well-positioned, building as it does on an existing township well-serviced by public transport and cycling options, to provide good accessibility to jobs, community services, and open spaces, as well as mitigating climate change impacts and future natural hazards by being not near the coast and well removed from major rivers.

NPS-UD Policy 1

Planning decisions contribute to well functioning urban environments, which are urban environments that, as a minimum:	**Assessment**
(a) have or enable a variety of homes that: (i) meet the needs, in terms of type, price, and location, of different households; and (ii) enable Māori to express their cultural traditions and norms;	The proposal is to have larger lots supporting predominantly standalone dwellings and associated accessory buildings (including generous sized garaging) in an open landscaped garden setting. This will fill a gap in the range of housing typologies available at Rangiora and contribute to a better functioning urban environment overall at Rangiora. It is not necessary for each individual rezoning proposal to have a wide range of housing typologies, and in some circumstances this may not be appropriate. The rezoning will deliver a premier high amenity urban subdivision with generous sized lots which will complement existing and planned higher density residential development at west Rangiora. There is scope with the relief sought for a mix of residential densities. The appropriateness of this can be considered at the master planning/ODP stage. The Site has the potential to create a unique urban environment in Rangiora. It can follow the example of Palmview based on a lake or Kaiapoi Likes providing a niche housing option in Rangiora and the District meeting a need for residential land not constrained to GRZ standards.
(b) N/A business sectors	
(c) have good accessibility for all people between housing, jobs, community services,	The Site has access to a collector road and a strategic road providing easy access to key community amenities and facilities. The town is served by a public bus route to the city, and a cycle trail connecting to Kaiapoi and the City. The new West Rangiora Development Area adjoins the Site to the south. The Site will become closer to Rangiora public transport routes as they extend out to service this new growth area over time.

natural spaces, and open spaces, including by way of public or active transport; and	The Site is in walking distance to Arlington Park and the Rakahuri/Ashley which contains abundant recreations pace. It is easily accessible to the town centre and within walking distance to the Huntingdon Drive local centre.
(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and	The demand for housing and land in Rangiora is largely ahead of the planning means to respond. This proposal will "top up" the land presently set aside in the PWDP and provide a useful buffer to demand. The Site owners have been keen to release this land for more intense development for some time; there is no prospect of land banking.
(e) support reductions in greenhouse gas emissions; and	The Site has significant advantages in being easily accessible to the town centre and reserves, community facilities and schools. The proposal retains a consolidated form to Rangiora with good connectivity and linkages to recreation space and commercial centres reducing the need for car travel.
(f) are resilient to the likely current and future effects of climate change	The Site is within the area of influence of a major river but the non-urban flood assessment maps do not show extensive flooding likely at the Site. Being inland it is not at risk from climate change induced extreme natural hazard events like sea level rise. or river flooding.

Effects on ecosystems and habitats

51. The Site is currently used for a mix of low intensity (grazing) farming, and lifestyle purposes. Shelter belts and utility buildings have been established
52. The Site has been identified in the PWDP with two ecological overlays (the PWDP ecological overlay – Plains and Low Plains Ecological District). They are a district-wide overlays and no specific ecological values have been identified in the Proposed Waimakariri District Plan. These overlays seek primarily to retain indigenous vegetation. The PWDP identifies SASM 025 nearby the Site. That is a Site and Area of Significance to Maori and in SASM - Schedule 1 is identified as *being River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species.*

Effects on natural and physical resources

53. The Site drains in a SE direction towards the newly developing residential area.
54. There will be a degree of site disturbance as part of creating the roading network, and reserves, and as part of curtilage development on each lot.
55. The proposed use for residential activity inevitably leads to loss of some rural productive potential as land owner intentions are not about farming or productive use of the land, but lifestyle use and enjoyment. Built forms and hard surfaces become more dominant.
56. The Site comprises 4ha bocks now and these are not able to be used effectively for productive purposes other than for intensive productions based on tunnel housing and other supported production systems. None exist in the Site now.
57. The Site contains Class 2 and Class 3 soils as defined in the NZ Land Use Inventory (Landcare Research) Land Use Capability classes 1-3 **(Figure 10)**. Productive use of these soils other than for low level purposes i.e. grazing, is not feasible given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production).

Figure 10: Site soils: Site outlined in red; (Canterbury Maps)
Class 2 soils: bright green/Class 3 soils: light green;

Discharges of contaminants into the environment
58. There will be no discharges of contaminants into the environment. Wastewater will discharge to the Council's reticulated system.
59. Stormwater discharges will potentially be to ground given ground conditions or to an approved and consented stormwater management and treatment area which will meet all relevant Council standards.

Risks from natural hazards or hazardous installations
60. The PWDP planning maps show the Site as being within a Non-Urban Flood Assessment Area.
61. The District Plan maps do not identify high flood hazard areas or high coastal flood hazard areas, rather these are identified through the flood assessment certification process. This enables the most up-to-date technical information to be used. However, as a guide, areas that are potentially high hazard can be identified through the Waimakariri District Natural Hazards Interactive Viewer (NH - Introduction).
62. Rules that refer to a Flood Assessment Certificate require a certificate to be obtained from the District Council to determine compliance with the relevant rule. The alternative is to apply for resource consent as set out in the rule.

63. Rule NH-R2 states
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;

64. Assessment of flood risk and consequence can be undertaken at subdivision stage.
65. There will be no hazardous installations proposed on the Site.

Geotechnical assessment
66. The PWDP planning maps show the Site as being "Liquefaction damage is unlikely. Standard investigation procedure outlined in NZS3604 is appropriate".

Contaminated land
67. A Preliminary Site Investigation can be carried out for the Site at subdivision stage.
68. An enquiry of ECAN has identified that two sites at the northern end of the Site potentially contain some contaminated land, which can be investigated further at subdivision stage **(Appendix 6)**. 315 Lehmans Road is an unverified HAIL site (previous use for clay target shooting) and 317 is registered as containing uninvestigated persistent pesticide bulk storage.

Servicing
69. Proposals for servicing the Site and the effects from such servicing in relation to domestic water supply, wastewater, stormwater, roading, and telecommunications will be required for any subdivision consent.

Economic effects
70. It is anticipated that urban development will generate positive economic effects, both from the investigation/development phase and for the longer run economic activity from householders participating in the local economy.

Climate Change effects
71. An assessment of the effects of the proposed rezoning on climate change is included as part of the assessment of a well-functioning urban environment above.
72. A well-functioning urban area that is designed and serviced in an integrated manner, applying sound urban design principles, will enable a reduction in greenhouse gas emissions compared to unplanned, ad hoc development that does not create compact urban forms located where the services and benefits of existing, established urban areas are not readily accessible.
73. There is a triangle of planning influence that can be brought to bear on reducing greenhouse gas emissions
a) Compact urban form minimising distances between homes and work/play options.
b) Proximity of homes to community facilities, services and amenities and business/work areas.
c) Design and provision of movement corridors and linkages that create opportunities other than for vehicles for getting

around.
74. The Site of the proposed rezoning:
a) Helps in retaining a compact urban form to Rangiora.
b) Is easily accessible to the town centre and is located convenient to the recreation resources of the nearby Rakahuri/Ashley River, the airfield and racecourse and Arlington Park.
75. Rangiora has excellent connectivity to the City, both via the Northern Motorway, the new Northern Corridor, a cycle way link to Kaiapoi which is linked to the new north city cycle way along the Northern Corridor and a very regular bus service.

Positive effects
76. The proposed rezoning will provide for the continued growth of Rangiora by managing the development through an ODP. The proposal will provide a buffer to on-going high level demand for lots in Rangiora. It will cater for a specific housing need not found in GRZ Zoned land nor LLRZ land. The proposed rezoning is anticipating a form of development that is a much more efficient use of a qualifying site supporting a well-functioning urban area. It is a positive endorsement of Rangiora as a growth node in the District.
77. The benefits derived from a planned ODP approach include facilitating high levels of connectivity, creating community links to identified focal points. The Site is close to recreation facilities. A coordinated and integrated development will provide a distinctive environmental quality and point of difference to the development.
78. The Site adjoins existing and developing residential development on the western edge of Rangiora.
79. From a community well-being perspective, the provision of additional land for residential growth will continue to support the Council's investment in community infrastructure by maintaining and facilitating growth rates, increasing the rating base and attracting development contributions.

STATUTORY PLANNING ASSESSMENT
80. Submissions must be assessed under the provisions of the RMA, including Part 2 and Section 32 (Requirements for Preparing Evaluation Reports).

National Policy Statements
National Policy Statement on Urban Development Capacity (NPS-UD)

81. The NPS–UD applies to this proposal as it is directed at Tier 1 urban environments, and
Tier 1 local authorities which includes Waimakariri District as part of the Christchurch urban environment that is defined in Table 1 of the NPS, and additionally defined as:
any area of land (regardless of size, and irrespective of local authority or statistical boundaries)
that: is, or is intended to be, predominantly urban in character; and is, or is intended to be, part of
a housing and labour market of at least 10,000 people.
82. The NPS-UD recognises the national significance of:
a) Having well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future; and
b) Providing sufficient development capacity to meet the different needs of people and communities.
83. The NPS outcomes are to be achieved through objectives that address:
a) Planning decisions improving housing affordability by supporting competitive land and development markets.
b) Regional policy statements and district plans enabling more people to live in areas of urban environments near centres or areas with employment opportunities, area well serviced by public transport or a high demand for housing in the area.
c) Urban environments developing and changing over time in response to diverse and changing needs of people, communities and future generations.
d) Local authority decisions on urban development being integrated with infrastructure planning and are strategic over the medium term and long term.
e) Local authority decisions on urban development are responsive particularly for proposals supplying significant development capacity.
f) New Zealand's urban environments support reductions in greenhouse emissions and are resilient to current and future effects of climate change.
84. The key method to achieve these objectives is by development of a Future Development Strategy (FDS). This will set out how the Councils will provide for sufficient development capacity over the next 30 years to meet expected demand. There is no FDS for the greater Christchurch Urban Area that meets the requirements of the NPS-UD.
85. Work on development capacity completed for the NPS - UDC 2016 by the Greater Christchurch Partnership as an Update of the existing Urban Development Strategy (UDS) – Our Space 2019 confirmed what there was a shortage of feasible development capacity for future housing in Waimakariri District for the medium (next 10 years) and long term (10 to 30 years) periods. That assessment is now out of date as it does not address the requirements of the NPS-UD; and rates of take up of land have exceeded projected rates.

86. One of the key changes in the NPS-UD is that local authority decisions on urban development that affects urban environments are responsive, particularly to proposals that would supply significant additional capacity. It also amends the required methodology for housing and business capacity assessments.
87. The current CRPS does not meet the new NPS-UD requirement in relation to proposals for significant additional capacity. Regional councils are required to include criteria in the RPS to determine what plan changes will be treated for the purposes of Policy 8 as adding significantly to development capacity as soon as practicable. ECAN has yet to respond to this requirement.
88. The NPS-UD has immediate effect, so in the meantime, proposals such as this submission must be assessed in the context of the overall intent and purpose of the NPSUD as articulated in the NPS-UD objectives and policies. This includes that NZ has well-functioning environments; provides sufficient development capacity to meet the different needs of people and communities; planning decisions improve housing affordability to contributing to competitive house and land markets; and RMA plans enable more people to live near major employment areas, where there is existing or planned public transport, and where there is high demand for housing.
89. The NPS-UD is the higher order document and its requirements override those of lower order documents where there is a conflict, including regional and district RMA plans.
90. Key objectives and policies in the NPS-UD are assessed here:

NPS-UD Objective/Policy	**Assessment**
Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	The proposed development will further enable Rangiora to sustain itself as a well-functioning urban environment by consolidating the residential area close to the town centre, and provide residential development close to public transport links and existing community and commercial facilities including Huntingdon Drive local centre.
Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.	The proposal provides choices in the Rangiora housing market and in doing so supports housing affordability. Whilst the proposal is for a premier larger lot urban residential development, it is important that all sectors of the market are catered for. This will be more affordable than forcing those wanting large sections out to the much larger and very limited areas of LLR D1 development, or having to purchase 2-3 sections in a standard residential subdivision. There Site is in multiple ownership and the landowners are working together to achieve the rezoning. It will bring more competition into the market by bringing new entrants into the market.
Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply: the area is in or near a centre zone or other area with many employment opportunities the area is well-serviced by existing or planned public transport there is high demand for housing or for business land in the area, relative to other areas within the urban environment.	The CRPS is due for review in 2024 but in the meantime the existing CRPS is not in accordance with the NPS-UD 2020. The proposed rezoning is on the edge of the District's largest centre, which offers a wide range of community and business services, and employment opportunities. It is expected that a proportion of future residents will commute outside the township, but as the township and associated business areas e.g. at Southbrook, continue to grow, this is expected to become proportionally less. Rangiora is well serviced with public transport, there is scope for future mass transit PP, and there is a high demand for housing at Rangiora. The Site adjoins the new West Rangiora Development Area, to the south. Extensions of public transport to service this growth area will be readily accessible to the Site.
Objective 6: Local authority decisions on urban development that affect urban environments are: integrated with infrastructure planning and funding decisions; and strategic over the medium term and long term; and responsive,	Whilst not currently identified as a future growth area in RMA documents, the Site is well placed at the township edge to be serviced by existing infrastructure. Some upgrades may be required, which will be investigated further with Council prior to the hearing. See Policy 8 below for commentary on proposals which supply

particularly in relation to proposals that would supply significant development capacity.	significant development capacity
Objective 8: New Zealand's urban environments: support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change	The proposal adjoins the existing built up are of Rangiora, close to public transport links. Its excellent accessibility to Christchurch City, substantially enhanced with the new Northern Motorway extensions, means it is now highly accessible to these nearby major employment areas. Travel distances are relatively short, minimising vehicle miles and the potential for greenhouse gas emissions. There is a cycleway link from into Christchurch City, and regular bus services, including an express route. The Site is inland and not subject to natural hazard risks associated with sea level rise arising from climate change.
Policy 1 – Planning decisions for well-functioning urban environments	Assessed at para 41-50
Policy 2 - Sufficient development capacity Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.	The proposed rezoning is anticipated to provide sections that will be available for the short term (up to 3 years) and into the medium term (3-10 years) if adopting a more conservative outlook. The locational and amenity advantages of Rangiora also favour strong ongoing demand. The PWDP UFD-O1 Feasible Development Capacity for residential activities identifies the need for 6300 residential units in the period 2018-2028, and 7100 residential units 2028-2048. These numbers are derived from Chapter 6 CRPS Table 6.1. and are out of date. Data from the Council (November 2021) confirms that there are about 800 vacant lots in Rangiora. Building consents are at about 180/year. That means there is about 4 years vacant land supply. A lead in time of 3-5 years is needed to go from rezone to house build so the Council is facing an unnecessary squeeze on land availability. That will translate in to an upward shift in land and section prices as has been the case at Rolleston. The data suggests that the PWDP will be late to the party to ensure there is at least sufficient development capacity to meet expected demand for housing land over the short term, medium term, and long term. There is a looming, inevitable land supply issue so any proposal to add capacity will push the Council closer to meeting the requirements of the NPS-UD. The proposal is consistent with ensuring there is at least sufficient land supply for housing.
Policy 8 – Responsiveness to plan changes Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is: (a) unanticipated by RMA planning	The proposed rezoning is not anticipated by RMA documents - it is not a Greenfield Priority or Future Development Area in the CRPS, or a New Development area in the PWDP. A responsive approach to the proposal is required as it meets the Policy 8 criteria for unanticipated zoning. It will contribution to well functioning urban environments and will add significant development capacity. There is no development capacity for the housing typology proposed – so any provision is significant in this context. The development will deliver appx 311 high amenity large lot residential sites at an average density of 1500m2. This will be higher if a mix

documents; or
(b) out-of-sequence with planned land release

of densities are proposed, which may be appropriate in some parts of the Site, dependent on master planning work to follow.

91. Adopting the submission to re-zone the land, and enable the proposed development on the submission Site will satisfy the objectives and policies of the NPS-UD.

Proposed National Policy Statement for Highly Productive Land (NPS-HPL)

92. The Government proposed in 2019 a NPS-HPL to prevent the loss of productive land and promote its sustainable management. The overall purpose of the proposed NPS-HPL is to improve the way highly-productive land is managed under the Resource Management Act 1991 (RMA) to:

a) Recognise the full range of values and benefits associated with its use for primary production
b) Maintain its availability for primary production for future generations
c) Protect it from inappropriate subdivision, use, and development.

93. The NPS-HPL is still a proposal and not intended to take effect until after Gazettal. At the date of this submission the NPS-HPL has no effect and no assessment of it is required for the purposes of this submission.

94. The Proposed NPS-HPL interim definition of HPL is land defined as Land Use Capability Class 1-3 soils. A portion of the Site contains Class 2 and 3 soils (see **Figure 10)**. Highly productive use of these soils is not realistic given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production). Its present use as lifestyle blocks, low level grazing and agistment is the more likely long run use of the Site if not rezoned.

95. Objective 3 of the Proposed NPS-HPL specifically refers to highly productive soils being protected by avoiding *"uncoordinated urban expansion on highly productive land that has not been subject to a strategic planning process"*. The Site was assessed through a strategic planning process (WDDS 2018) and the RRS as a preferred site for LLRZ development, and rejected for a change in zoning on the basis that it may be required for long term urban growth of Rangiora.

96. It is therefore considered that this submission to re-zone the Site is largely in accordance with the Proposed NPS-HPL.

National Planning Standards

97. The National Planning standards prescribe various matters under the RMA so that there is consistency among planning documents most relevantly here in terms of appellations for zones, and the standards applying to these zones.

98. The proposed rezoning adopts the standard zone appellation, in this case LLRZ as contained in the PWDP.

99. The PWDP identifies plan standards for minimum and average net site areas for the respective zones. These are modified for the proposed rezoning as a higher density LLRZ.

100. The higher density LLR zoning is entirely consistent with the NPS purpose for the LLRZ as reproduced below. In this case, the principal constraint to more intensive development is the peri-urban location where a lower density transition to the rural environment is appropriate (particularly noting that the zone boundary is 'mid block' so there is no natural or physical buffer between rural and residential areas); the existing pattern of 4 ha lots with existing substantial homes and gardens; and the fact that the premier large lot subdivision proposed relies on consistency of housing quality and character to be deliver on this vision for the area.

Large lot residential zone

Areas used predominantly for residential activities and buildings such as detached houses on lots larger than those of the Low density residential and General residential zones, and where there are particular landscape characteristics, physical limitations or other constraints to more intensive development.

Low density residential zone

Areas used predominantly for residential activities and buildings consistent with a suburban scale and subdivision pattern, such as one to two storey houses with yards and landscaping, and other compatible activities.[2]

Canterbury Regional Policy Statement 2013 (CRPS)

101. Chapter 6 of the RPS *"provides a resource management framework for the recovery of Greater Christchurch, to enable and support recovery and rebuilding, including restoration and enhancement, for the area through to 2028. Recovery in Greater Christchurch is also supported by the provisions in Chapter 5 notated as 'Entire Region'. The provisions in the remainder of the RPS also apply.3"*

102. An assessment of the proposed rezoning against the relevant CRPS Objectives and Policies is set out in **Appendix 1**. This should be read in the context of the CRPS being overdue for review and that it does not provide a regional response to the NPS-

UD. The
need to focus on earthquake recovery has now passed and so many of the directive provisions need to be given appropriate 'weight' in a new national policy environment with a focus on flexible, responsive panning approaches that better provide for people's needs and well-being.

103. That assessment shows that

a) The development proposal achieves the objectives for the location, design and function of new developments (Objective 5.2.1)

b) The traffic effects of the proposal are unlikely to give rise to adverse effects and so achieves CRPS objectives for the strategic land transport network (Policy 5.3.7)

c) The Site falls outside the FDAs shown on Map A of Chapter 6 and in that regard is inconsistent with RPS Policy 6.2.1 clauses 1 to 3.

1. identifies priority areas for urban development within Greater Christchurch;

2. identifies Key Activity Centres which provide a focus for high quality, and, where appropriate, mixed-use development that incorporates the principles of good urban design;

3. avoids urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS

d) The environmental effects assessment outlined above establish that the proposed development is consistent and will not give rise to any concerns with respect to all the matters listed in RPS Policy 6.2.1 clauses 4. to 11. These matters are:

6.2.1 Recovery framework

Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that:

1. As above;

2. As above;

3. As above;

4. protects outstanding natural features and landscapes including those within the Port Hills from inappropriate subdivision, use and development;

5. protects and enhances indigenous biodiversity and public space;

6. maintains or improves the quantity and quality of water in groundwater aquifers and surface waterbodies, and quality of ambient air;

7. maintains the character and amenity of rural areas and settlements;

8. protects people from unacceptable risk from natural hazards and the effects of sea-level rise;

9. integrates strategic and other infrastructure and services with land use development;

10. achieves development that does not adversely affect the efficient operation, use, development, appropriate upgrade, and future planning of strategic infrastructure and freight hubs;

11. optimises use of existing infrastructure; and

12. N/A

e) The proposed rezoning achieves policies relating to:

- Sustainability;
- Integration of transport infrastructure and land use;
- Urban design; and
- Biodiversity, natural hazards, landscape, soils, contaminated land.

104. In terms of the CRPS polices for rural residential developments (Policy 6.3.9) the proposal sits square with all policy matters other than being a location identified in an adopted Rural Residential Strategy; and being at a higher density than provided for under this policy (ie greater than 1-2 hh/ha). As such it has a majority of features entirely consistent with the policy.

105. The CRPS includes housing capacity targets as below

6.2.1a Targets for sufficient, feasible development capacity for housing [inserted in accordance with sections 55(2) and 55(A) of the Resource Management Act 1991, from the National Policy Statement on Urban Development Capacity 2016]

For the period 2018-2048, sufficient, feasible development capacity for housing is enabled in Greater Christchurch in accordance with Table 6.1.

Table 6.1 Targets for housing development capacity in Greater Christchurch, 2018-2048

106. These derive from Our Space, under the requirements of the then NPS-Urban Development Capacity 2016, since replaced by the NPS-UD 2020. The targets (known as bottomlines in the NPS-UD) are to be treated as 'minimums' not 'maximums'.

Policy 6.3.12
enables urban development in the Rangiora and Kaiapoi FDAs (new Development Areas in the PWDP) where needed to meet the medium term targets. This a 'minimum' allocation approach contrary to the NPS-UD. The NPS-UD favours over allocation, including in locations unanticipated by RMA plans, where it will add additional development capacity, can be integrated with infrastructure planning and funding, and will contribute to well functioning urban environments – as is the case the proposed Lehmans LLR D2 zone.
107. The proposed Lehmans LLR D2 zone is consistent with the CRPS except with respect to those parts of the CRPS which are out of step with and do not give effect to the higher order plan, the NPS-UD.

Proposed Waimakariri District Plan
108. An assessment of this proposal against the relevant PWDP Objectives and Policies for urban growth and development as notified on 17 September 2021 is set out in **Appendix 2.**
109. That assessment shows that the proposed rezoning is entirely consistent with the relevant objectives and policies, including as sought to be amended by this submission. Those amendments are to UFD-P3 Identification/location and extension of Large Lot Residential Zone areas; and LLRZ-O1 and LLRZ- P1-5 and reflect the intent and outcomes intended for the proposed LLRZ D2 zone, which is a higher density LLRZ zone than the PWDP LLRZ zone (renamed LLRZ D1 in this submission).

ASSESSMENT AGAINST OTHER PLANNING DOCUMENTS
Our Space 2018-2048 Greater Christchurch Settlement Update (2019)
110. Our Space is a non-statutory document prepared under the Local Government Act. It
"responds to the new Government Policy Statement on Land Transport, which has increased funding for mass public transit schemes, and meets the requirement of the National Policy Statement on Urban Development Capacity (NPS-UDC) 2016 to prepare a
future development strategy…. Specifically, it:
• sets out how targets for housing for the next 30 years will be met, accommodating an additional 150,000 people;
• identifies locations for housing growth, encouraging Central City and suburban centre living while providing for township growth in Rolleston, Rangiora and Kaiapoi;…
• promotes a compact urban form, which provides for efficient transport and locates development in a manner that takes into account climate change and sea level rise.[4].

..Underpinning this settlement pattern approach is the vision for a transformation of the transport network that fosters much greater public and active transport usage, and reduced reliance on the private vehicle.
111. Our Space acknowledges that this will require commitment from the Government to invest in the necessary improvements to our transport system, which could include investing in rapid transit services. To date, there has been no successful business case for improved public transportation, including not as a Covid 19 fast track infrastructure project.
112. The Our Space housing capacity targets (Table 3) and Future Development Areas are related to growth of urban areas.
113. Our Space, like the CRPS (and the Operative District Plan) are now out of date, as they do not reflect or give effect to the new requirements of the NPS-UD.

Waimakariri 2048 District Development Strategy (WDDS)
114. The preferred growth directions for Rangiora in the WDDS 2048 (2018) are outlined above (under 'Site') i.e. westwards to Lehmans Road, and otherwise eastwards. However, the Council in its decision on the RRS, recognized west of Lehmmans Road as a potential longer town urban growth area.
115. The WDDS Rangiora Snapshot (pp38-39) -when looking ahead to 2048 proposed that:
a) Rangiora remains the District's largest town
b) 30,000 – estimated population (2048)
c) 12,025 – estimated households
d) 5,025 - new households in Rangiora
e) Continues to accommodate one third of the District's residential growth
f) 167 – estimated annual building consents for new dwellings for the next 30 years
g) 423 hectares of additional feasible residential land required by 2048 (this includes capacity in remaining stages of existing residential developments as well as new greenfield areas inside and outside of the Infrastructure Boundary)
h) Future residential growth directions proposed to the east (predominantly) and west of the current town
i) Opportunities for intensification/regeneration to be identified
j) New growth directions take into account areas of unacceptable natural hazard risk and areas of significant environmental and cultural values
k) New growth areas to connect into existing sewer and water networks

l) Stormwater Levels of Service designed to meet increased performance requirements

116. At the 2018 Census Rangiora had a population of 17,841, and 7314 total dwellings (incl those unoccupied and under construction). Population projections for the District show an average annual change 2018-2020 of 1700 persons. If Rangiora continues to attract a third of all district growth as stated in the WDSS then Rangiora's population in 2021 will be around 18,900.

Mahaanui Iwi Management Plan

117. Part 1 of the PWDP in a section "Mana Whenua" sets out the position with respect to iwi and the review of the district Plan:

a) The District's territorial area sits within the takiwā (territory) of Ngāi Tūāhuriri which is one of eighteen Ngāi Tahu regional papatipu rūnanga, constituted under the ***Te Rūnanga o Ngāi Tahu Act 1996*** *to represent* ***mana whenua*** *interests.*

b) The preparation and change of a district plan must take into account relevant iwi documents. For the District, Ngāi Tahu has set out its resource management values, issues, objectives and policies within the Mahaanui Iwi Management Plan (2013).

c) The Mahaanui Iwi Management Plan identifies objectives, issues and policies for natural resource and environmental management for six pāpatipu rūnanga (including Te Ngāi Tūāhuriri Rūnanga). It seeks to ensure that the taonga and resources of Ngāi

Tahu mana whenua are recognised and protected in the decision-making of statutory agencies. The Mahaanui Iwi Management Plan contains a comprehensive suite of policies and objectives addressing the range of resource management matters of significance to tangata whenua. The District Council shall have regard to the Mahaanui Iwi Management Plan when preparing or changing the District Plan, to the extent its content has a bearing on resource management issues of the District.

118. The Mahaanui Iwi Management Plan (MIMP) 2013 was released on 1 March 2013.

119. The MIMP is a tool for tangata whenua to express their identity as manawhenua and their objectives as kaitiaki, to protect their taonga and resources, and their relationships with these. The MIMP seeks to ensure that these taonga and resources are recognised and protected in the decision-making of agencies with statutory responsibilities to tangata whenua. Importantly it is also a tool that assists Papatipu Rūnanga representatives to articulate their values, issues and policy into statutory processes.

120. The MIMP includes both general objectives and policies about the management of land, air, and water, and also includes catchment specific objectives and policies.

121. Section 5.3 Wai Maori (pp77-98) contains an extensive discussion about tangata whenua rights and interests in freshwater. It provides a suite of Issues, Objectives and Policies for freshwater

122. Section 5.4 Papatuanuku (pp101-124) sets out the Ngai Tahu Subdivision and Development Guidelines that are to be read along-side objectives relating to:

a) Land use planning and management in the takiwā reflects the principle of Ki Uta Ki Tai. (from the mountains to the sea)

b) Rural and urban land use occurs in a manner that is consistent with land capability, the assimilative capacity of catchments and the limits and availability of water resources.

c) Inappropriate land use practices that have a significant and unacceptable effect on water quality and quantity are discontinued.

d) Ngāi Tahu has a prominent and influential role in urban planning and development.

e) Subdivision and development activities implement low impact, innovative and sustainable solutions to water, stormwater, waste and energy issues.

123. Section 5.5 Tane (pp127-137) includes objectives that focus on:

a) Regional policy, planning and decision making in the takiwā reflects the particular interest of Ngāi Tahu in indigenous biodiversity protection, and the importance of mahinga kai to Ngāi Tahu culture and traditions.

b) The customary right of Ngāi Tahu to engage in mahinga kai activity is recognised, protected and enhanced…

c) Customary use, and therefore mahinga kai, is given effect to as a first order priority for freshwater management in the takiwā.

124. Section 6.4 (pp213-224) addresses issues of particular significance to the lands and waters of the Waimakariri catchment within which the Site lies.

125. Relevant Objectives relating to urban development of land in that catchment include:

a) The natural "energy, vitality and life" of the Waimakariri River as a braided river is protected and restored.

b) The discharge of contaminants to the Waimakariri and its tributaries is eliminated.

c) Water quality and flows in the Waimakariri and its tributaries are improved to enable whānau and the wider community to have places they can go to swim and fish.

d) The mauri and mahinga kai values of the Waimakariri and its tributaries and associated springs, wetlands and lagoons are protected and restored; mō tātou, ā, mō kā uri ā muri ake nei.

126. A key issue relating to subdivision and development is that subdivision and development activities in the lower catchment

have the potential to adversely affect Ngāi Tahu values such as waterways, mahinga kai and sites of significance (Issue Wai4).
127. The proposal provides for full urban reticulation of the three waters and is consistent with the objectives and policies contained in Chapters 5.3 and 5.4 of the MIMP. The proposal does not preclude individual land owners from installing rainwater collection and use from roof areas at the time of building development.
128. The proposal has been designed taking into consideration the potential effect of resultant subdivision and development on the rivers and streams that flow into the lowland rivers.
129. Overall it is considered that the proposal will not have adverse impact on the cultural values of iwi as set out within the MIMP.

SECTION 32 ASSESSMENT

130. A Section 32 assessment is contained in **Appendix 3.**
131. In summary, the PWDP zoning and associated rules (RLZ Zone with a minimum lot size for subdivision and a dwelling 4ha) do not meet the needs and aspirations of the current owners.
132. Strategic Council planning documents (specifically the WDDS) have a focus on only meeting urban growth demands within urban environments of existing towns. They favour intensification (15hh/ha) and a strict allocation of capacity by development areas. It is a control and command regime consistent with Map A of Chapter 6 of the CRPS but is out of step with the requirements of the NPS-UD which requires a more flexible, responsive approach, prohibits a hard fixed unmoveable urban/rural boundary.
133. This approach leaves little room for new proposals or proposals that do not sit square with the standard array of GRZ/medium density or SETZ (Settlement Zone). SETZ applies to some of the District's smaller settlements outside Greater Christchurch.
134. Neither LRZ nor Large Lot Residential (LLRZ) as notified in the PWDP is an efficient use of this block of land located as it is immediately adjoining the urban area of Rangiora, and in a location easily accessible to the town centre by active transport modes as well as car and several district reserves.
135. If this Site is not zoned for LLRZ D2 (minimum average lot size 1500m^2) use to enable residential re-development then it will drive pressure to re-zone elsewhere. That step potentially will not have the significant benefits to Rangiora long term in relation to enabling a well-functioning urban environment that enables people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future. Additionally re-zoning to LLRZ D2 will contribute to providing additional development capacity to meet the different needs of people and communities in a planned manner and consistent with the NPS-UD.
136. The Site can readily be developed to reflect the principles of the Urban Design Protocol with values of character, context, and connectivity.
137. The Section 32 assessment concludes that the proposal to re-zone the Site from LRZ zone to LLRZ D2 Zone (average lot size 1500m$_2$) is the most appropriate method for achieving the objectives of the proposal, than the other alternatives considered.
138. Option 2 identified in the s 32 assessment is consistent with some PWDP policies notwithstanding that it does sit square with the strategic intentions signaled in the WDDS and the PWDP approach to providing for development capacity and urban development.
139. Option 2 identified in the s 32 assessment to re-zone the Site is the most appropriate given:
a) The proposals adopt the PWDP zones, development and activity standards with appropriate amendments. This ensures continuity of the District Plan anticipated environmental outcomes and urban amenity for Rangiora and adjoining residential areas;
b) Will be consistent with and give effect to many of the relevant PWDP objectives and policies;
c) It is a logical extension to the developed and developing residential land adjoining the Site while achieving a compact, efficient urban form that removes pressure on isolated rural land elsewhere around Rangiora.
d) It gives effect to the NPS-UD, specifically Objective 6 c) and Policy 8, delivering significant additional development capacity and contributing to a well functioning urban environment.
e) It is assumed that there will be capacity in the public utilities and the existing road network, including planned upgrades, to accommodate the traffic effects of the redevelopment;
f) The proposed Site specific ODP will provide certainty of the final form and disposition of the re-zoned area including its proposals for reserves, roading, future linkages for pedestrian and vehicular traffic.
140. The re-zoning proposal is considered to be appropriate to achieve the sustainable growth and development of Rangiora.
141. The economic, social and environmental benefits of the proposed rezoning outweigh any potential costs.
142. The overall efficiency and effectiveness of the proposed rezoning (Option 2) is high, in comparison to the alternative options set out in the s 32 Assessment which are low (Options One and Four) or low to moderate (Option Three).
143. The PWDP proposes to release land for development in the new Development Areas at Rangiora and Kaiaipoi through a novel and untested certification process that is not clearly derived from RMA statutory powers, nor Local Government Act 2002 (LGA) authority. This approach is not proposed for the LLR Overlay areas. As the proposed Lehmans Road LLR D2 zone proposed by this submission seeks large lot urban densities, it is anticipated that Council may favour the certification process if it accepts the proposed rezoning. This is opposed – rezoning to LLRZ D2 is sought.
144. Potential difficulties with the proposed certification process are identified and discussed in the Section 32 Assessment.

(**Appendix 3)**. In summary, the process is hugely discretionary, does not provide conventional rights to an applicant (eg right of objection/appeal) meaning decisions cannot be challenged, and it is not apparent that the process will be appropriately documented with a transparent record of the decision-making within the certification process. Further uncertainty arises in the practicalities of how to negotiate and manage the staging, funding and building of key infrastructure across a range of Sites, and a risk that land supply is controlled by a limited number of large developers. It is a far less efficient and effective method for delivering land for housing than the Council rezoning the land in the PWDP.
145. The proposed rezoning is considered to be the most appropriate, efficient and effective means of achieving the purpose of the RMA.

CONSULTATION
146. The landowners and their consultants have submitted on the WRRS and the WDDS (**Appendix 4)**.
147. The submissions to re-zone as rural residential or identify the Site as suitable for LLRZ have been rejected as noted above. LLRZ but at higher densities as now proposed is considered to be a more efficient use of the land and better meets market demand. 5000m^2 sites provide more land is needed for a spacious home and garden.
148. The landowners have been consistent in their wish to find a zone and possible land uses better suited to their needs.

CONCLUSION

173 The submission seeks to rezone 58 ha of land adjoining Rangiora from Lifestyle Rural Zone (LRZ) to Large Lot Residential with a specific density standard (LLRZ D1), minimum average lot size 1500m^2.
149. The Site has a long history of rural lifestyle use. It is not significantly restricted by potential natural hazards especially flooding, nor does it have physical limitations for development for residential purposes as it is not liquefaction prone, and has no known geotechnical limitations but does contain an area of LUC 2 soils. It is near a site of significance to iwi (SASM – 025) being the Rakahuri/Ashley River The Site has access to a collector road and is near to a strategic road giving direct access to the town centre and a range of community amenities and facilities.
150. The Site immediately adjoins the urban area of Rangiora, and is well located to join in to Council utility services. It is well suited for conversion to residential use.
151. The Site is not identified within the westward growth direction for Rangiora in the District Development Strategy 2018 nor is it part of the DEV-WR development area which adopts Lehmans Road as its western boundary. It is in a location that achieves coherent and compact urban form offering ease of access to business services, community facilities, reserves and the primary road network.
152. The proposed rezoning provides for a connected and high amenity residential living environment not presently available under the PWDP while avoiding and/or mitigating any potential adverse effects on the environment. It will provide for continuing high demand for a variety of high quality residential sections aimed at a particular segment of the housing market in an ideal location, easily accessible to the existing town centre services and facilities. It will broaden the range of housing available. As such, it is consistent with the NPS-UD including Objective 6c) and Policy 8, to be responsive to proposals which supply significant development capacity and contribute to a well functioning urban environment.
153. The use of this Site for residential purposes can be a sustainable and efficient use of land and infrastructure. The proposed rezoning better provides for the social, economic, environmental well-being of the landowners and the Rangiora community than continuation of the current low intensity lifestyle land use on 4ha blocks, or a conventional LLRZ residential use.
154. Any potential adverse effects of the implementation of the proposed rezoning can be assessed at subdivision stage but there has been no restriction on servicing the blocks to date. Capacity will need to be confirmed for infrastructure, power and road network. Any future subdivision of the Site will need to confirm water supply and wastewater treatment and disposal options.
155. Rezoning of the site to LLRZ zone is not inconsistent with the policies and objectives of the PWDP, but it is at odds with the dated CRPS approach to provision of urban growth and housing capacity for Greater Christchurch, to the extent that it is not within an FDA created by Change 1 to the CRPS and is not identified as an LLRZ site under the strategic RRS prepared by the Council.
156. As the proposal helps achieve the purpose of the RMA, and has been shown to be consistent with the relevant provisions of the NPS-UD, the submission can be accepted by Waimakariri District Council.

Original Submission

Summary Reasons for the Submission

The reasons for our submission are outlined below.
a) The preferred relief (**the proposed rezoning**) is both appropriate and necessary to achieve sustainable growth and

development of Rangiora and the District and meet the requirements of the National Policy Statement for Urban Development 2020 (**NPS-UD**).

b) The Site identified in Figure 1 and at para 1 of the Preferred Relief above is a logical and preferred location that lends itself to a specific type of housing development not provided within the PWDP as a residential option adjoining but outside the existing urban areas. Nowhere is it possible to develop in a comprehensive, coordinated way a low density, high quality residential environment in the District's towns, the Rural Lifestyle Zone or Settlement Zone as a permitted activity.

c) The requirement for 12/15 hh/ha in GRZ zones (the majority of land in urban areas) drives development to modern scale relatively small urban lots best produced as a package across a significant land holding. The GRZ subdivision standards do not provide for the needs of people who seek a generous sized urban lot residential setting. This is a housing sector that is running against the planning tide of intensification but is, nonetheless, a legitimate form of housing in an appropriate setting. The barriers to such development in urban areas requires an appropriate setting/ location in the rural areas but close to or adjoining the urban areas and at a much lower density than is desired or appropriate (the PWDP LLRZ) to meet the housing needs for generous sized urban lot residential living..

d) The PWDP subdivision standards for LLRZ require lots that are very large for those whose primary interest in a rural setting is a form of residential living, not one that requires significant maintenance and management often involving animals or machinery at scale. Conversely, the GRZ subdivision standards do not provide for the needs of people who seek a large lot residential setting

e) The focus in the PWDP is on prescribing a limited range of residential options and tightly controlling and constraining housing choice within those options. Further urban growth is also tightly constrained and controlled around DEV areas around Rangiora and Kaiapoi but for a very specific form of residential development driven off density requirements that do not match the needs of all landowners.

f) The focus in most new District Plans, driven in part by the National Planning standards, is to simplify the range of zones, to standardize lot sizes, to supposedly create efficiency and certainty through ease of administration of the District Plans. This is done by constraining housing and land development choices by lot size, by location, by built standards and the disposition of built/open elements in a site. However, the National Planning standards do provide for large lot urban residential living, a residential living option which has not been taken up the PWDP (due most likely to the restrictive provisions of the CRPS which only prescribe one from of lower density residential living, at a density of 1-2 hh/ha).

g) This planning approach may be a standard approach to resource allocation but it does not provide a flexible, responsive approach to innovative and new development options. The Government is creating policy settings that on one hand seek intensification in urban areas, while at the same time pushing away from a land allocation model of planning. The PWDP in striving to face both policy directions has a package of measures that are in fact a major barrier in terms or cost, timeframes and certainties for proposals that are not cut from the suite of housing and development options set out by the PWDP. The allocation of land in preferred development areas, it must be said, runs counter to the Government's push, and now its direction, to free up land for development, to encourage innovation in housing (presently with a focus of intensification) and to make available a range of responses to the need to meet the housing needs of people and communities set out in the NPS-UD.

h) While the weight of demand (and the planning response) is around affordable housing, around small lots and dense development that supports investment in public facilities and amenities such as public and active transport, reserves, and commercial services, there is always a wide spectrum of preferences at play in the housing market. The demand for high quality, generous houses set on generous sized parcels of land within high amenity settings is an important and no less relevant housing sector. There is a strong unmet demand, as confirmed by advice from Bayleys real estate (**Appendix 5**) for larger family homes with room for a pool or similar. Purchasers want to be close the amenities of Rangiora and within walking and cycling distance of local schools. They do not want the only available options – a 4 ha lifestyle block or 5000m^2 rural residential site at Mandeville or Ohoka.

i) Interestingly enough for a nation built on the so-called quarter acre paradise, recent policy and planning interest in housing and land development has now seemingly positioned the 1011m^2 section as a luxury item, as the antithesis of providing for community well-being and needs. It is as though the old quarter acre of itself acts against building a sense of community despite being able to be developed in a planned, structured, coordinated or integrated manner. Rather than being a frivolous discretionary item in land development
and housing choice, a well-planned, well located and properly serviced low density residential environment has much to offer urban environments. They can be tactically used to provide shape and edge to urban areas, they can provide a mass of amenity different from (and potentially complementary to), but no less legitimate in urban outcome terms, to conventional GRZ zoned land.

j) In many ways the approach of a district plan to the role and place of the old quarter acre is not dissimilar to the issues faced by comprehensive retirement villages when first proposed. The idea of dense, almost gated and self-contained communities, with multi storey buildings also did not sit well in many district plans. But now they are accepted as an important part of the urban fabric catering to a specific demographic and health demographic. Most plans enable them.

k) Provision for low density residential in an urban setting, or failing that likelihood, in an adjoining rural zone is a fundamental gap in the district plan.

l) The submission seeks to provide for another housing typology not provided in the PWDP and in a location with significant planning merit. The planning case was made out in a detailed submission to the proposed Rural Residential Strategy (**RRS**) for

the land identified in this submission to be “reserved” for conventional Rural Residential zoning in the review of the District Plan. That submission was rejected in favour of a decision ascribing an unspecific strategic significance to Lehmans Road as the urban boundary; simply the decision was that rural residential development here would preclude this area as a future urban growth path, even though this was likely to be very long term as the Waimakariri District Development Strategy (WDDS 2018) for the period up to 2048, does not favour urban growth west of Lehmans Road.

Officer Recommendation

Continue to exclude the area west of Lehmans Road and the racecourse land at Rangiora as growth areas as these were originally considered but not included in the draft RRDS as they trigger the key preliminary criteria of: being on the direct edges of a main town outside of the Projected Infrastructure Boundary (PIB) thereby foreclosing more intensive long-term urban development, and…

Panel Recommendation

The panel accepted the officer recommendations to exclude areas on the fringes of Rangiora in the final RRDS due to these having the potential to foreclose more intensive long-term urban development of the town.

m) In light of the above decision on the Waimakariri Rural Residential Strategy, the proposal now is for a form of high amenity low density urban zoning, which whilst in demand is entirely absent from the PWDP. This will be a long term urban form of development. The proposal set out in the submission will achieve a compact, and efficient, urban form on the edge of Rangiora with excellent connectivity by multiple transport modes. It provides for continuous urban development by enabling a built form which can act as a strong zone or urban boundary.

n) The proposed rezoning will accommodate approximately 311 LLRZ lots1 at the proposed amended density standards for LLRZ D2 (average size 1500m^2). It will contribute to a well-functioning urban environment, meeting the NPS-UD Objective 6(c).

o) Any adverse effects on the environment arising from the proposed rezoning will be minimal, if any, and can be adequately mitigated. A high amenity master planned development is proposed.

p) Significant positive effects arise from the proposed rezoning. It will enable the short term housing demand at Rangiora to be met, and can deliver a housing typology for which there is demand, on lots that are not a burden to the landowners (which is the case for 4ha and the very limited areas of LLRZ D1 with a density of 1-2 hh/ha) and for which there is no provision in the PWDP. At present rates of land uptake there is about 4 years vacant land supply in Rangiora. Given it takes 3-5 years to bring land from zoned state to on the market as developed lots, there is some urgency in providing additional capacity. This proposal helps address an anticipated shortfall in residential zoned plan enabled land.

q) There is no additional cost to the Council in re-zoning the Site as there is expected to be capacity in the public utilities and the existing road network, including planned upgrades.

r) Amendments to PWDP objectives and policies may be necessary to provide for a higher density LLRZ, but of themselves will not act against those relating to Strategic Directions Urban Form and Development and Urban Growth. The PWDP approach to zones and
identification of future development land is already out of step with higher order Resource Management Act 1991 (RMA) statutory documents because they do not give effect to the NPS-UD (and are sought to be amended through this submission).

s) The alternatives of retaining Rural Lifestyle or Large Lot Residential zone across the entire Site are not an efficient use of land which immediately adjoins the urban area of Rangiora, and is highly accessible to the town centre by active transport modes as well as car.

t) The proposed rezoning is consistent with and the most appropriate, efficient and effective means of achieving the purpose of the RMA.

The Site

1. The Site is a 58ha block of land (‘the Site’) accessed from Lehman Road, Rangiora **(Figure 1)**. It is owned by the two submitters and 12 other landowners.

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1 Assumes 20% of land area taken for servicing including roading, reserves and stormwater management if required.

Figure 1: The site (outlined in blue (Google Earth)

2. The Site is surrounded by RLZ land that is used for a mix of lifestyle and conventional farming. To the NE is the Rangiora Eco Holiday Park, and beyond the Park is the Rangiora Racecourse about 300m away from the nearest lot and 1km from the centre of the Site. Land to the south east is GRZ and part of urban Rangiora with newly developing residential land west of West Belt. About 1.9 km to the NW is Rangiora Airfield. About 1km north of the most northern lot is the Ashley River.
3. The southern-most lot in the proposal with the Rangiora Vet Clinic faces, but does not have access to Rangiora-Oxford Road (State Highway 72). This arterial road provides the main road connection in to the centre of the town. The well-established Fernside Rural residential area is about 2.5km west from the junction of Lehmans and Rangiora-Oxford Roads.

Figure 2: the site is a broader context (Site marked red)

4. The Site is not identified as lying within a preferred growth direction for Rangiora in the Waimakariri 2048 District Development Strategy (2018) (**WDDS**) **(Figure 3)**. No land west of Lehmans Road is included in the West Rangiora Development Area (**DEV-WR**) in the PWDP.

Figure 3: Figure 11 WDDS

5. The Council reviewed its strategic approach to the location and provision of Rural Residential land (now zoned LLRZ in the PWDP) in the WDSS. It adopted the position that it would:

a) Explore tools such as cluster development to manage rural character

b) For rural residential development, adopt an approach that has a primary focus on creating new rural residential areas, with a secondary focus on enabling large lot intensification within existing rural residential areas where there is sufficient community support and servicing available

c) Review the Rural Residential Development Plan for the whole District (pg 21 WDDS).

6. Rangiora presently has a population of 17,841 (2018 Census). It grew steadily between 2006 and 2018. Growth of Rangiora since then has continued in step with the district growth which has increased 8.2% between 2018 and 2021 from 61,300 to 66,300 at an annual average of 2.8% from 2018 to 2020 (Statistics NZ Subnational population projections at 30 June 2021: provisional).

2006 (count)	2013 (count)	2018 (count)
12,165	15,069	17,841

Statistics NZ

Population projections at 30 June

PLANNING STATUS OF THE SITE

Chapter 6 of the Canterbury Regional Policy Statement

7. An assessment of the CRPS is set out in **Appendix 1** to this submission.
8. The Site is within the Greater Christchurch area.
9. It was not shown as a Greenfield Priority Area – Residential (GPA) on Map A of the Canterbury Regional Policy Statement (CRPS). The GPA terminates at Lehmans Road.
10. As a result of the Minister for the Environment's decision of 28 May 2021 on Change 1 to Chapter 6, an area largely south of Oxford Road and a finger of land to the north of Oxford Road was included as a Future Development Area (**FDA**) (**Figure 4** orange).

Figure 4: Map A Chapter 6 Regional Policy Statement Greenfield Priority areas
Site location identified with red circle (appx)

11. The FDAs are intended to accommodate the increased demand for new dwellings in that part of Waimakariri District within the Greater Christchurch Urban Area and to respond to the NPS-UD. They do not provide "plan enabled" land as they need to negotiate a rezoning process to confirm their status as land developable for housing and other urban purposes.
12. The proposal for a LLRZ zone with average lot sizes of 1500m2 is inconsistent with the policy approach of Chapter 6 for Greater Christchurch, in that if fits none of the residential living typologies provided for in Chapter 6 and is not in a location identified for urban or rural residential development. It sits 'between' the urban and rural residential densities provided for in the CRPS (minimum 10 hh/ha for urban in Waimakariri, and average 1-2 hh/ha for rural residential). The proposed density is appx. 6.66 hh/ha.
13. Notwithstanding, the proposal meets all the location and other criteria in CRPS Policy 6.3.9 for rural residential development. It is:

- Outside the CIAL noise contours
- Has some sites with restrictions from the take-off and landing vectors for Rangiora Airfield but not such as to impact its operational capacity.
- Is outside the groundwater protection zone
- Is not within the Waimakariri stop bank system
- Has no views of or to the Port Hills
- Has good access for emergency services
- Will not create reverse sensitivity issues with adjoining land uses; Rangiora Racecourse is 500m away.
- Free of significant natural hazards and is a flat site.
- Supports no significant natural values or ecological values.
- Contains no SASMs.
- Can be integrated into or consolidated with the existing urban area of west Rangiora.
- Contains no surface water bodies so there will be no adverse impacts on these.
- The development will be contingent on an ODP to provide integrated design for subdivision and land use, and provide for the long-term maintenance of a high quality high density rural residential character.
- The proposal is not intended as a staged development towards full urban; rather it is intended to provide a unique residential environment that can stand alone and contribute to the urban fabric of Rangiora like Palmview in east Rangiora, or as Kaiapoi Lakes does for Kaiapoi.

14. Overall, the proposal is not consistent with Chapter 6 but that is more a function of its original purpose when formulated in 2013. Notwithstanding that, the submission for a lower density residential focussed, high quality urban environment that attaches to an existing urban area and that promotes a coordinated pattern of development has planning merit.

Operative Waimakariri District Plan
15. The Site is zoned Rural in the Operative Plan. The minimum lot size for subdivision and a dwelling is 4 ha.
Proposed Waimakariri District Plan
16. The Site is zoned Rural Lifestyle Zone **(LRZ) (Figure 4).** The minimum lot size for subdivision and a dwelling in the LRZ is 4 ha.
17. Oxford Road is a strategic road and Lehmans Road is a collector road.

Figure 5: Proposed District Plan Zoning (site outlined in red)

18. The Site is also subject to, or potentially influenced by, a number of Overlays:
    a) Rangiora Airfield Take Off Climb and Approach Obstacle Limitation Surface (**Figure 6**)
    b) National Grid Transmission Lines (**Figure 6**)
    c) Liquefaction: Liquefaction damage is unlikely (**Figure 6**)
    d) Non-Urban Flood Assessment Area (**Figure 7**)
    e) Geographic areas: Ecological Area – Plains

f) Ecological District – Low Plains

Figure 6: Rangiora Airfield Take-off and Approach vectors (blue dashed lines); Liquefaction damage unlikely (green)Transmission lines (green lines); Site outlined in red

Figure 7: Non-urban flood assessment & Waimakariri Flood Hazard maps
Blue – medium risk, green – low risk, white – very low

DEVELOPMENT PROPOSAL AND PROPOSED REZONING

19. Subdivision of the Site will create approximately 311 LLRZ D2 lots.
20. The key design drivers for the proposal are:

a) A high amenity premier residential zone with large houses on large sites – average 1500m^2, min 1000m$_2$ based on the St Kilda, Hamilton development concept (**Figure 8**).

b) LLRZ D2 standards would enable a lower density zone in the medium term e.g. 10 years to achieve a high quality consistent character subdivision. If developed as an integrated development subject to an ODP subdivision can be staged for to the proposal.

c) Creating strong connections with the immediate neighbourhood by providing a cohesive interconnected roading layout that picks up direct links to the eastern neighbourhood off Lehmans Road and the northern subdivision roading, and carries them into the Site.

d) Creating a high amenity and diverse residential neighbourhood by providing interfaces to roads, reserves and rural environments.

e) Respecting and building on local identity and character of Rangiora by retaining specific vegetation features from the Site, and anchoring the development into the wider landscape.

21. A development concept can provide for sound urban design by:

a) A hierarchy of movement corridors.

b) Prioritisation of walking and cycling.

c) A north-south alignment of street blocks to maximize solar access and provide for efficient use of lots.

d) Block perimeters being kept as small as practicable to aid permeability and higher public amenity.

e) Enabling a range of housing typologies set in high quality landscape and street setting with generous amenity plantings and curtilage.

Figure 8: St Kilda development images (Bayleys)

22. St Kilda, Cambridge is a premier development on the outskirts of Cambridge, centrally located and with easy access to the Waikato Expressway. It was originally part of a small dairy operation which was dissected by the Waikato Expressway, leaving a portion within the Cambridge Town boundary and the larger balance of the property of approximately 80 ha (which became St Kilda) on the Eastern side of the Expressway, left in the Rural Zone.
23. The initial development concepts were for a Rural Residential type development given the Expressway separation of the existing residential development on the Western side of the Cambridge Bypass, however this was not supported by Council and a new concept of larger residential sections of a 1600m² average size was developed and approved – see https://www.stkilda.nz/page/location/

EFFECTS ON THE ENVIRONMENT

Township growth and urban form

24. The Site immediately adjoins the western edge of urban Rangiora.
25. The WDDS indicated a general preference for the direction of urban growth of Rangiora to the east as a way of balancing up the residential areas around the town centre and some growth to the west.
26. The approach of the WDDS was to signal growth options to be confirmed in the District Plan Review:

The broad directions for greenfield residential growth for the District's main towns are set out in Figures 11 to 14. Further work will be carried out to identify and confirm the exact locations and extent of these residential growth areas, together with the intensification opportunities within existing urban areas. These will be enabled through the District Plan Review and other planning tools.

27. The Strategic Planning documents clearly signal active consideration of growth needs and growth directions. The options available to the Council were constrained by the approach of the CRPS as the District Plan has to give effect to the CRPS and cannot be
inconsistent with it. The CRPS took effect in 2013 and is overdue for review.
28. The CRPS tightly holds urban growth to the constraints of Map A Chapter 6 and the identified FDAs which although amended by Plan Change 1 in 2020 does not respond to the directions of the NPS-UD. In any event the approach is focused on the need for housing in full urban residential land, less on other residential development forms.
29. As such the Site falls outside the planning policy framework for urban growth. However, in terms of urban form and on the ground, there is considerable merit and logic to conversion of this existing LRZ land to a new high amenity residential form that can be integrated into the Rangiora urban fabric.
30. The proposal has the potential to anticipate the longer term growth path confirmed by the decisions on the RRS to protect the future growth option of more intensive urban development in this direction. It can set a pathway to further westward expansion on land
that holds few if any physical barriers to land development.
31. The proposal will contribute to the housing needs of Rangiora and in a form and location that does not undermine the long run urban form of Rangiora. Planned growth confirmed in the PWDP is already intended to extend westwards out to Lehmans Road and to keep the town edge squared up providing depth to future development and providing a rational basis for providing movement networks driven off the key roads such as Rangiora-Oxford Roads. The West Rangiora Future Development Area confirms this approach. The Site sits in the next block west of Lehmans Road so is not proposing a disjointed urban form, nor one that is not part of the long term thinking of urban form and growth for Rangiora.

32. A full residential zoning is proposed under LLRZ D2 and will provide a high quality street character, overall amenity and passive surveillance over the street, and will create the correct lighting standards, roading standard, fully formed footpaths and cycleways required for a high quality urban environment.

Neighbourhood and wider community effects
33. The Site is serviced by a collector road and is close to an arterial road. This provides for ease of access and safe and convenient movement to and from the Site. A planned development co-ordinated by an ODP can facilitate within the site movement corridors and linkages through the Site to provide for walking and cycling.
34. A key positive neighbourhood and community effect will arise from the existing dwellings and their established gardens and plantings that will anchor new development and provide a point of reference for new dwellings. Development will not be on a bare site; it will take place in an existing established part-residential setting. The transition to a low density, high quality premier residential development will start from a favourable position and minimise the apparent extent and nature of the landscape change.
35. The Site is comparatively large (58.4 ha) and has the potential to support a variety of residential building typologies and this will contribute to a mix of households within the development and provide built form variety and interest in the streetscape. Whilst LLR D2 standards are proposed, it may be that part of the Site is suitable for other higher density forms of development, which would be within scope of the alternative relief, and could be considered as part of the master planning process required for preparation of an ODP (ahead of the hearing). The earlier stages of the St Kilda development were for large lot residential, with more clusters of townhouses included as later stages (and a retirement village). A retirement village is unlikely in this case, given the proximity of the Charles Upham Retirement Village.
36. Rangiora is well-positioned to accommodate and service the needs of a fast-growing resident population that will in turn support more business activity, schools, community facilities and community organisations.

Effects on tangata whenua values
37. The Proposed District Plan does not identify any Sites and Areas of Significance to Maori in the Site, but the nearby Rakahuri/Ashely River identified as SASM-025. This has been scheduled as being
River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species
38. The PWDP has Policy SASM-P8 which is relevant to pre-development processes:
Engagement with rūnanga
Te Ngāi Tūāhuriri Rūnanga and the District Council to encourage engagement with the Rūnanga priorto persons undertaking activities and/or applying for resource consent where the activity has thepotential to adversely affect identified sites or areas of Ngāi Tūāhuriri cultural significance. Where priorengagement with Te Ngāi Tūāhuriri Rūnanga h as not been undertaken by an applicant for an activitythat has the potential to adversely affect an identified site, the District Council will consult with the Rūnanga.
39. The Site is not listed as an archaeological site on the NZ Archaeological Site database.

Landscape and visual effects
40. Rural Lifestyle style development exists on the Site now (a series of 4 ha lots with a dwelling and associated accessory buildings on each). The landscape is dominated by shelter belts, utility buildings, significant trees and planted curtilages around

dwellings many of which are well set back off the roads down RoWs.
41. An ODP will help to achieve an integrated, cohesive and coherent development The proposal will lead to a modification of the landscape of the Site from a predominantly lifestyle block landscape to a denser semi-urban environment dominated by residential building that will, in time, get the benefit of street tree and reserve plantings and landscape treatments around the houses.
42. The visual effects which will arise from a change in the number of vegetative and built elements in the landscape are significant, but not avoidable, if the Site is to contribute to the on-going growth of Rangiora. The change will contribute to a high quality amenity and quality of environment and one that will be entirely consistent with and supportive of the rural lifestyle residential development that has successfully established on the Site.

Well-functioning urban environments
43. The Site adjoins the existing built up urban area of Rangiora. Immediately to the east are existing or developing residential areas.
44. The conversion of the Site from present rural lifestyle uses to low density, high quality residential will continue a pattern of outward expansion of Rangiora. Such a change may not be consistent with the PWDP's identification of a Future Development Overlay for west Rangiora only as far west as Lehmans Road, but on the ground it will look and integrate as part of the urban fabric.
45. It will provide some replacement lower density living areas for the existing LLR zones at north west Rangiora – but at much more appropriate higher density that the LLR D1 standard which is 1-2 hh/ha. There are two such areas, shown on the planning maps below. River Road has an 'urban overlay' and is intended to be intensified to urban densities. The land on the opposite (east) side of Lehmans Road is a 'legacy' rural residential zoning which applies under the Operative District Plan. The landowners have developed the adjoining residential subdivision and wish to develop the land for full urban residential development. Services are in place to support this. The constraint to date has been Map A of the CRPS which does not include the land as a Greenfield Priority Area or Future Development Area, GR zoning of this land is consistent with the NPS-UD.

Figure 9: PWDP as notified – LLRZs shown in light grey. Diagonal stripes – urban growth overlay.
Site outlined in red.
46. Rangiora is growing apace. It is attracting significant interest from new home buyers as people respond to the significant investment in upgraded transport links (Northern Corridor and public transport) and a growing economic base for employment within the District and the City.
47. Rangiora has excellent connectivity to the City, both via the new Northern Corridor, and a nascent cycleway link into the City. There is a very regular bus service every half hour.(the No 1 Blue Line) The standard trip takes 70 minutes, and there is a twice daily weekday morning express service from Rangiora, and seven times weekday express out to Rangiora all via Kaiapoi.
48. The Site will step out the western edge of Rangiora, but as it exists in a peri-urban form now, such a change does not alter how the Site interacts with Rangiora as a whole. It is in many ways a functional part of urban Rangiora now; it's only the Zone boundaries and policy framework that create the sense of it not being part of Rangiora.
49. The Site is convenient to the Rakihura/ Ashley recreation trails, the racecourse, Arlington Park, and the airfield. The town centre is easily accessible.
50. The following assessment of the criteria in the NPS-UD for determining a well-functioning urban environment shows that the proposed rezoning will deliver urban, housing and residential outcomes that meet those criteria. There will be a variety of homes enabled by generous lot sizes. The Site is well-positioned, building as it does on an existing township well-serviced by public transport and cycling options, to provide good accessibility to jobs, community services, and open spaces, as well as mitigating climate change impacts and future natural hazards by being not near the coast and well removed from major rivers.

NPS-UD Policy 1

Planning decisions contribute to well functioning urban environments, which are urban environments that, as a minimum:	**Assessment**

(a) have or enable a variety of homes that: (i) meet the needs, in terms of type, price, and location, of different households; and (ii) enable Māori to express their cultural traditions and norms;	The proposal is to have larger lots supporting predominantly standalone dwellings and associated accessory buildings (including generous sized garaging) in an open landscaped garden setting. This will fill a gap in the range of housing typologies available at Rangiora and contribute to a better functioning urban environment overall at Rangiora. It is not necessary for each individual rezoning proposal to have a wide range of housing typologies, and in some circumstances this may not be appropriate. The rezoning will deliver a premier high amenity urban subdivision with generous sized lots which will complement existing and planned higher density residential development at west Rangiora. There is scope with the relief sought for a mix of residential densities. The appropriateness of this can be considered at the master planning/ODP stage. The Site has the potential to create a unique urban environment in Rangiora. It can follow the example of Palmview based on a lake or Kaiapoi Likes providing a niche housing option in Rangiora and the District meeting a need for residential land not constrained to GRZ standards.
(b) N/A business sectors	
(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and	The Site has access to a collector road and a strategic road providing easy access to key community amenities and facilities. The town is served by a public bus route to the city, and a cycle trail connecting to Kaiapoi and the City. The new West Rangiora Development Area adjoins the Site to the south. The Site will become closer to Rangiora public transport routes as they extend out to service this new growth area over time. The Site is in walking distance to Arlington Park and the Rakahuri/Ashley which contains abundant recreations pace. It is easily accessible to the town centre and within walking distance to the Huntingdon Drive local centre.
(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and	The demand for housing and land in Rangiora is largely ahead of the planning means to respond. This proposal will “top up” the land presently set aside in the PWDP and provide a useful buffer to demand. The Site owners have been keen to release this land for more intense development for some time; there is no prospect of land banking.
(e) support reductions in greenhouse gas emissions; and	The Site has significant advantages in being easily accessible to the town centre and reserves, community facilities and schools. The proposal retains a consolidated form to Rangiora with good connectivity and linkages to recreation space and commercial centres reducing the need for car travel.
(f) are resilient to the likely current and	The Site is within the area of influence of a major river but the non-urban flood assessment maps do not show extensive flooding likely at the Site.

future effects of climate change	Being inland it is not at risk from climate change induced extreme natural hazard events like sea level rise. or river flooding.

Effects on ecosystems and habitats

51. The Site is currently used for a mix of low intensity (grazing) farming, and lifestyle purposes. Shelter belts and utility buildings have been established

52. The Site has been identified in the PWDP with two ecological overlays (the PWDP ecological overlay – Plains and Low Plains Ecological District). They are a district-wide overlays and no specific ecological values have been identified in the Proposed Waimakariri District Plan. These overlays seek primarily to retain indigenous vegetation. The PWDP identifies SASM 025 nearby the Site. That is a Site and Area of Significance to Maori and in SASM - Schedule 1 is identified as *being River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species.*

Effects on natural and physical resources

53. The Site drains in a SE direction towards the newly developing residential area.

54. There will be a degree of site disturbance as part of creating the roading network, and reserves, and as part of curtilage development on each lot.

55. The proposed use for residential activity inevitably leads to loss of some rural productive potential as land owner intentions are not about farming or productive use of the land, but lifestyle use and enjoyment. Built forms and hard surfaces become more dominant.

56. The Site comprises 4ha bocks now and these are not able to be used effectively for productive purposes other than for intensive productions based on tunnel housing and other supported production systems. None exist in the Site now.

57. The Site contains Class 2 and Class 3 soils as defined in the NZ Land Use Inventory (Landcare Research) Land Use Capability classes 1-3 **(Figure 10)**. Productive use of these soils other than for low level purposes i.e. grazing, is not feasible given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production).

Figure 10: Site soils: Site outlined in red; (Canterbury Maps)
Class 2 soils: bright green/Class 3 soils: light green;

Discharges of contaminants into the environment

58. There will be no discharges of contaminants into the environment. Wastewater will discharge to the Council's reticulated system.

59. Stormwater discharges will potentially be to ground given ground conditions or to an approved and consented stormwater management and treatment area which will meet all relevant Council standards.

Risks from natural hazards or hazardous installations

60. The PWDP planning maps show the Site as being within a Non-Urban Flood Assessment Area.

61. The District Plan maps do not identify high flood hazard areas or high coastal flood hazard areas, rather these are identified through the flood assessment certification process. This enables the most up-to-date technical information to be used. However, as a guide, areas that are potentially high hazard can be identified through the Waimakariri District Natural Hazards Interactive Viewer (NH - Introduction).

62. Rules that refer to a Flood Assessment Certificate require a certificate to be obtained from the District Council to determine compliance with the relevant rule. The alternative is to apply for resource consent as set out in the rule.

63. Rule NH-R2 states
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;

64. Assessment of flood risk and consequence can be undertaken at subdivision stage.

65. There will be no hazardous installations proposed on the Site.

Geotechnical assessment
66. The PWDP planning maps show the Site as being “Liquefaction damage is unlikely. Standard investigation procedure outlined in NZS3604 is appropriate”.

Contaminated land
67. A Preliminary Site Investigation can be carried out for the Site at subdivision stage.
68. An enquiry of ECAN has identified that two sites at the northern end of the Site potentially contain some contaminated land, which can be investigated further at subdivision stage **(Appendix 6)**. 315 Lehmans Road is an unverified HAIL site (previous use for clay target shooting) and 317 is registered as containing uninvestigated persistent pesticide bulk storage.

Servicing
69. Proposals for servicing the Site and the effects from such servicing in relation to domestic water supply, wastewater, stormwater, roading, and telecommunications will be required for any subdivision consent.

Economic effects
70. It is anticipated that urban development will generate positive economic effects, both from the investigation/development phase and for the longer run economic activity from householders participating in the local economy.

Climate Change effects
71. An assessment of the effects of the proposed rezoning on climate change is included as part of the assessment of a well-functioning urban environment above.
72. A well-functioning urban area that is designed and serviced in an integrated manner, applying sound urban design principles, will enable a reduction in greenhouse gas emissions compared to unplanned, ad hoc development that does not create compact urban forms located where the services and benefits of existing, established urban areas are not readily accessible.
73. There is a triangle of planning influence that can be brought to bear on reducing greenhouse gas emissions
a) Compact urban form minimising distances between homes and work/play options.
b) Proximity of homes to community facilities, services and amenities and business/work areas.
c) Design and provision of movement corridors and linkages that create opportunities other than for vehicles for getting around.
74. The Site of the proposed rezoning:
a) Helps in retaining a compact urban form to Rangiora.
b) Is easily accessible to the town centre and is located convenient to the recreation resources of the nearby Rakahuri/Ashley River, the airfield and racecourse and Arlington Park.
75. Rangiora has excellent connectivity to the City, both via the Northern Motorway, the new Northern Corridor, a cycle way link to Kaiapoi which is linked to the new north city cycle way along the Northern Corridor and a very regular bus service.

Positive effects
76. The proposed rezoning will provide for the continued growth of Rangiora by managing the development through an ODP. The proposal will provide a buffer to on-going high level demand for lots in Rangiora. It will cater for a specific housing need not found in GRZ Zoned land nor LLRZ land. The proposed rezoning is anticipating a form of development that is a much more efficient use of a qualifying site supporting a well-functioning urban area. It is a positive endorsement of Rangiora as a growth node in the District.
77. The benefits derived from a planned ODP approach include facilitating high levels of connectivity, creating community links to identified focal points. The Site is close to recreation facilities. A coordinated and integrated development will provide a distinctive environmental quality and point of difference to the development.
78. The Site adjoins existing and developing residential development on the western edge of Rangiora.
79. From a community well-being perspective, the provision of additional land for residential growth will continue to support the Council’s investment in community infrastructure by maintaining and facilitating growth rates, increasing the rating base and attracting development contributions.

STATUTORY PLANNING ASSESSMENT
80. Submissions must be assessed under the provisions of the RMA, including Part 2 and Section 32 (Requirements for Preparing Evaluation Reports).

National Policy Statements
National Policy Statement on Urban Development Capacity (NPS-UD)

81. The NPS–UD applies to this proposal as it is directed at Tier 1 urban environments, and Tier 1 local authorities which includes Waimakariri District as part of the Christchurch urban environment that is defined in Table 1 of the NPS, and additionally defined as:

any area of land (regardless of size, and irrespective of local authority or statistical boundaries) that: is, or is intended to be, predominantly urban in character; and is, or is intended to be, part of a housing and labour market of at least 10,000 people.

82. The NPS-UD recognises the national significance of:

a) Having well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future; and

b) Providing sufficient development capacity to meet the different needs of people and communities.

83. The NPS outcomes are to be achieved through objectives that address:

a) Planning decisions improving housing affordability by supporting competitive land and development markets.

b) Regional policy statements and district plans enabling more people to live in areas of urban environments near centres or areas with employment opportunities, area well serviced by public transport or a high demand for housing in the area.

c) Urban environments developing and changing over time in response to diverse and changing needs of people, communities and future generations.

d) Local authority decisions on urban development being integrated with infrastructure planning and are strategic over the medium term and long term.

e) Local authority decisions on urban development are responsive particularly for proposals supplying significant development capacity.

f) New Zealand's urban environments support reductions in greenhouse emissions and are resilient to current and future effects of climate change.

84. The key method to achieve these objectives is by development of a Future Development Strategy (FDS). This will set out how the Councils will provide for sufficient development capacity over the next 30 years to meet expected demand. There is no FDS for the greater Christchurch Urban Area that meets the requirements of the NPS-UD.

85. Work on development capacity completed for the NPS - UDC 2016 by the Greater Christchurch Partnership as an Update of the existing Urban Development Strategy (UDS) – Our Space 2019 confirmed what there was a shortage of feasible development capacity for future housing in Waimakariri District for the medium (next 10 years) and long term (10 to 30 years) periods. That assessment is now out of date as it does not address the requirements of the NPS-UD; and rates of take up of land have exceeded projected rates.

86. One of the key changes in the NPS-UD is that local authority decisions on urban development that affects urban environments are responsive, particularly to proposals that would supply significant additional capacity. It also amends the required methodology for housing and business capacity assessments.

87. The current CRPS does not meet the new NPS-UD requirement in relation to proposals for significant additional capacity. Regional councils are required to include criteria in the RPS to determine what plan changes will be treated for the purposes of Policy 8 as adding significantly to development capacity as soon as practicable. ECAN has yet to respond to this requirement.

88. The NPS-UD has immediate effect, so in the meantime, proposals such as this submission must be assessed in the context of the overall intent and purpose of the NPSUD as articulated in the NPS-UD objectives and policies. This includes that NZ has well-functioning environments; provides sufficient development capacity to meet the different needs of people and communities; planning decisions improve housing affordability to contributing to competitive house and land markets; and RMA plans enable more people to live near major employment areas, where there is existing or planned public transport, and where there is high demand for housing.

89. The NPS-UD is the higher order document and its requirements override those of lower order documents where there is a conflict, including regional and district RMA plans.

90. Key objectives and policies in the NPS-UD are assessed here:

NPS-UD Objective/Policy	**Assessment**
Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	The proposed development will further enable Rangiora to sustain itself as a well-functioning urban environment by consolidating the residential area close to the town centre, and provide residential development close to public transport links and existing community and commercial facilities including Huntingdon Drive local centre. The proposal provides choices in the Rangiora housing market and in doing so

Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.	supports housing affordability. Whilst the proposal is for a premier larger lot urban residential development, it is important that all sectors of the market are catered for. This will be more affordable than forcing those wanting large sections out to the much larger and very limited areas of LLR D1 development, or having to purchase 2-3 sections in a standard residential subdivision. There Site is in multiple ownership and the landowners are working together to achieve the rezoning. It will bring more competition into the market by bringing new entrants into the market.
Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply: the area is in or near a centre zone or other area with many employment opportunities the area is well-serviced by existing or planned public transport there is high demand for housing or for business land in the area, relative to other areas within the urban environment.	The CRPS is due for review in 2024 but in the meantime the existing CRPS is not in accordance with the NPS-UD 2020. The proposed rezoning is on the edge of the District's largest centre, which offers a wide range of community and business services, and employment opportunities. It is expected that a proportion of future residents will commute outside the township, but as the township and associated business areas e.g. at Southbrook, continue to grow, this is expected to become proportionally less. Rangiora is well serviced with public transport, there is scope for future mass transit PP, and there is a high demand for housing at Rangiora. The Site adjoins the new West Rangiora Development Area, to the south. Extensions of public transport to service this growth area will be readily accessible to the Site.
Objective 6: Local authority decisions on urban development that affect urban environments are: integrated with infrastructure planning and funding decisions; and strategic over the medium term and long term; and responsive, particularly in relation to proposals that would supply significant development capacity.	Whilst not currently identified as a future growth area in RMA documents, the Site is well placed at the township edge to be serviced by existing infrastructure. Some upgrades may be required, which will be investigated further with Council prior to the hearing. See Policy 8 below for commentary on proposals which supply significant development capacity
Objective 8: New Zealand's urban environments: support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change	The proposal adjoins the existing built up are of Rangiora, close to public transport links. Its excellent accessibility to Christchurch City, substantially enhanced with the new Northern Motorway extensions, means it is now highly accessible to these nearby major employment areas. Travel distances are relatively short, minimising vehicle miles and the potential for greenhouse gas emissions. There is a cycleway link from into Christchurch City, and regular bus services, including an express route. The Site is inland and not subject to natural hazard risks associated with sea level rise arising from climate change.
Policy 1 – Planning decisions for well-functioning urban environments	Assessed at para 41-50
	The proposed rezoning is anticipated to provide sections that will be available for the short term (up to 3 years) and into the medium term (3-10 years) if adopting a more conservative outlook.

Policy 2 - Sufficient development capacity Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.	The locational and amenity advantages of Rangiora also favour strong ongoing demand. The PWDP UFD-O1 Feasible Development Capacity for residential activities identifies the need for 6300 residential units in the period 2018-2028, and 7100 residential units 2028-2048. These numbers are derived from Chapter 6 CRPS Table 6.1. and are out of date. Data from the Council (November 2021) confirms that there are about 800 vacant lots in Rangiora. Building consents are at about 180/year. That means there is about 4 years vacant land supply. A lead in time of 3-5 years is needed to go from rezone to house build so the Council is facing an unnecessary squeeze on land availability. That will translate in to an upward shift in land and section prices as has been the case at Rolleston. The data suggests that the PWDP will be late to the party to ensure there is at least sufficient development capacity to meet expected demand for housing land over the short term, medium term, and long term. There is a looming, inevitable land supply issue so any proposal to add capacity will push the Council closer to meeting the requirements of the NPS-UD. The proposal is consistent with ensuring there is at least sufficient land supply for housing.
Policy 8 – Responsiveness to plan changes Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is: (a) unanticipated by RMA planning documents; or (b) out-of-sequence with planned land release	The proposed rezoning is not anticipated by RMA documents - it is not a Greenfield Priority or Future Development Area in the CRPS, or a New Development area in the PWDP. A responsive approach to the proposal is required as it meets the Policy 8 criteria for unanticipated zoning. It will contribution to well functioning urban environments and will add significant development capacity. There is no development capacity for the housing typology proposed – so any provision is significant in this context. The development will deliver appx 311 high amenity large lot residential sites at an average density of 1500m2. This will be higher if a mix of densities are proposed, which may be appropriate in some parts of the Site, dependent on master planning work to follow.

91. Adopting the submission to re-zone the land, and enable the proposed development on the submission Site will satisfy the objectives and policies of the NPS-UD.

Proposed National Policy Statement for Highly Productive Land (NPS-HPL)

92. The Government proposed in 2019 a NPS-HPL to prevent the loss of productive land and promote its sustainable management. The overall purpose of the proposed NPS-HPL is to improve the way highly-productive land is managed under the Resource Management Act 1991 (RMA) to:

a) Recognise the full range of values and benefits associated with its use for primary production
b) Maintain its availability for primary production for future generations
c) Protect it from inappropriate subdivision, use, and development.

93. The NPS-HPL is still a proposal and not intended to take effect until after Gazettal. At the date of this submission the NPS-HPL has no effect and no assessment of it is required for the purposes of this submission.

94. The Proposed NPS-HPL interim definition of HPL is land defined as Land Use Capability Class 1-3 soils. A portion of the Site contains Class 2 and 3 soils (see **Figure 10)**. Highly productive use of these soils is not realistic given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production). Its present use as lifestyle blocks, low level grazing and agistment is the more likely long run use of the Site if not rezoned.

95. Objective 3 of the Proposed NPS-HPL specifically refers to highly productive soils being protected by avoiding *"uncoordinated urban expansion on highly productive land that has not been subject to a strategic planning process"*.

The Site was assessed through a strategic planning process (WDDS 2018) and the RRS as a preferred site for LLRZ development, and rejected for a change in zoning on the basis that it may be required for long term urban growth of Rangiora.
96. It is therefore considered that this submission to re-zone the Site is largely in accordance with the Proposed NPS-HPL.

National Planning Standards

97. The National Planning standards prescribe various matters under the RMA so that there is consistency among planning documents most relevantly here in terms of appellations for zones, and the standards applying to these zones.
98. The proposed rezoning adopts the standard zone appellation, in this case LLRZ as contained in the PWDP.
99. The PWDP identifies plan standards for minimum and average net site areas for the respective zones. These are modified for the proposed rezoning as a higher density LLRZ.
100. The higher density LLR zoning is entirely consistent with the NPS purpose for the LLRZ as reproduced below. In this case, the principal constraint to more intensive development is the peri-urban location where a lower density transition to the rural environment is appropriate (particularly noting that the zone boundary is 'mid block' so there is no natural or physical buffer between rural and residential areas); the existing pattern of 4 ha lots with existing substantial homes and gardens; and the fact that the premier large lot subdivision proposed relies on consistency of housing quality and character to be deliver on this vision for the area.

Large lot residential zone

Areas used predominantly for residential activities and buildings such as detached houses on lots larger than those of the Low density residential and General residential zones, and where there are particular landscape characteristics, physical limitations or other constraints to more intensive development.

Low density residential zone

Areas used predominantly for residential activities and buildings consistent with a suburban scale and subdivision pattern, such as one to two storey houses with yards and landscaping, and other compatible activities.[2]

Canterbury Regional Policy Statement 2013 (CRPS)

101. Chapter 6 of the RPS *"provides a resource management framework for the recovery of Greater Christchurch, to enable and support recovery and rebuilding, including restoration and enhancement, for the area through to 2028. Recovery in Greater Christchurch is also supported by the provisions in Chapter 5 notated as 'Entire Region'. The provisions in the remainder of the RPS also apply.3"*
102. An assessment of the proposed rezoning against the relevant CRPS Objectives and Policies is set out in **Appendix 1**. This should be read in the context of the CRPS being overdue for review and that it does not provide a regional response to the NPS-UD. The
need to focus on earthquake recovery has now passed and so many of the directive provisions need to be given appropriate 'weight' in a new national policy environment with a focus on flexible, responsive panning approaches that better provide for people's needs and well-being.
103. That assessment shows that

a) The development proposal achieves the objectives for the location, design and function of new developments (Objective 5.2.1)

b) The traffic effects of the proposal are unlikely to give rise to adverse effects and so achieves CRPS objectives for the strategic land transport network (Policy 5.3.7)

c) The Site falls outside the FDAs shown on Map A of Chapter 6 and in that regard is inconsistent with RPS Policy 6.2.1 clauses 1 to 3.

1. identifies priority areas for urban development within Greater Christchurch;

2. identifies Key Activity Centres which provide a focus for high quality, and, where appropriate, mixed-use development that incorporates the principles of good urban design;

3. avoids urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS

d) The environmental effects assessment outlined above establish that the proposed development is consistent and will not give rise to any concerns with respect to all the matters listed in RPS Policy 6.2.1 clauses 4. to 11. These matters are:

6.2.1 Recovery framework

Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that:

1. As above;

2. As above;

3. As above;

4. protects outstanding natural features and landscapes including those within the Port Hills from inappropriate subdivision, use and development;

5. protects and enhances indigenous biodiversity and public space;
6. maintains or improves the quantity and quality of water in groundwater aquifers and surface waterbodies, and quality of ambient air;
7. maintains the character and amenity of rural areas and settlements;
8. protects people from unacceptable risk from natural hazards and the effects of sea-level rise;
9. integrates strategic and other infrastructure and services with land use development;
10. achieves development that does not adversely affect the efficient operation, use, development, appropriate upgrade, and future planning of strategic infrastructure and freight hubs;
11. optimises use of existing infrastructure; and
12. N/A

e) The proposed rezoning achieves policies relating to:
- Sustainability;
- Integration of transport infrastructure and land use;
- Urban design; and
- Biodiversity, natural hazards, landscape, soils, contaminated land.

104. In terms of the CRPS polices for rural residential developments (Policy 6.3.9) the proposal sits square with all policy matters other than being a location identified in an adopted Rural Residential Strategy; and being at a higher density than provided for under this policy (ie greater than 1-2 hh/ha). As such it has a majority of features entirely consistent with the policy.
105. The CRPS includes housing capacity targets as below

6.2.1a Targets for sufficient, feasible development capacity for housing [inserted in accordance with sections 55(2) and 55(A) of the Resource Management Act 1991, from the National Policy Statement on Urban Development Capacity 2016]
For the period 2018-2048, sufficient, feasible development capacity for housing is enabled in Greater Christchurch in accordance with Table 6.1.
Table 6.1 Targets for housing development capacity in Greater Christchurch, 2018-2048

106. These derive from Our Space, under the requirements of the then NPS-Urban Development Capacity 2016, since replaced by the NPS-UD 2020. The targets (known as bottomlines in the NPS-UD) are to be treated as 'minimums' not 'maximums'.
Policy 6.3.12
enables urban development in the Rangiora and Kaiapoi FDAs (new Development Areas in the PWDP) where needed to meet the medium term targets. This a 'minimum' allocation approach contrary to the NPS-UD. The NPS-UD favours over allocation, including in locations unanticipated by RMA plans, where it will add additional development capacity, can be integrated with infrastructure planning and funding, and will contribute to well functioning urban environments – as is the case the proposed Lehmans LLR D2 zone.
107. The proposed Lehmans LLR D2 zone is consistent with the CRPS except with respect to those parts of the CRPS which are out of step with and do not give effect to the higher order plan, the NPS-UD.

Proposed Waimakariri District Plan
108. An assessment of this proposal against the relevant PWDP Objectives and Policies for urban growth and development as notified on 17 September 2021 is set out in **Appendix 2.**
109. That assessment shows that the proposed rezoning is entirely consistent with the relevant objectives and policies, including as sought to be amended by this submission. Those amendments are to UFD-P3 Identification/location and extension of Large Lot Residential Zone areas; and LLRZ-O1 and LLRZ- P1-5 and reflect the intent and outcomes intended for the proposed LLRZ D2 zone, which is a higher density LLRZ zone than the PWDP LLRZ zone (renamed LLRZ D1 in this submission).

ASSESSMENT AGAINST OTHER PLANNING DOCUMENTS
Our Space 2018-2048 Greater Christchurch Settlement Update (2019)
110. Our Space is a non-statutory document prepared under the Local Government Act. It
"responds to the new Government Policy Statement on Land Transport, which has increased funding for mass public transit schemes, and meets the requirement of the National Policy Statement on Urban Development Capacity (NPS-UDC) 2016 to prepare a
future development strategy…. Specifically, it:
• sets out how targets for housing for the next 30 years will be met, accommodating an additional 150,000 people;
• identifies locations for housing growth, encouraging Central City and suburban centre living while providing for township growth in Rolleston, Rangiora and Kaiapoi;…

• *promotes a compact urban form, which provides for efficient transport and locates development in a manner that takes into account climate change and sea level rise.[4].*

..Underpinning this settlement pattern approach is the vision for a transformation of the transport network that fosters much greater public and active transport usage, and reduced reliance on the private vehicle.

111. Our Space acknowledges that this will require commitment from the Government to invest in the necessary improvements to our transport system, which could include investing in rapid transit services. To date, there has been no successful business case for improved public transportation, including not as a Covid 19 fast track infrastructure project.

112. The Our Space housing capacity targets (Table 3) and Future Development Areas are related to growth of urban areas.

113. Our Space, like the CRPS (and the Operative District Plan) are now out of date, as they do not reflect or give effect to the new requirements of the NPS-UD.

Waimakariri 2048 District Development Strategy (WDDS)

114. The preferred growth directions for Rangiora in the WDDS 2048 (2018) are outlined above (under 'Site') i.e. westwards to Lehmans Road, and otherwise eastwards. However, the Council in its decision on the RRS, recognized west of Lehmmans Road as a potential longer town urban growth area.

115. The WDDS Rangiora Snapshot (pp38-39) -when looking ahead to 2048 proposed that:

a) Rangiora remains the District's largest town
b) 30,000 – estimated population (2048)
c) 12,025 – estimated households
d) 5,025 - new households in Rangiora
e) Continues to accommodate one third of the District's residential growth
f) 167 – estimated annual building consents for new dwellings for the next 30 years
g) 423 hectares of additional feasible residential land required by 2048 (this includes capacity in remaining stages of existing residential developments as well as new greenfield areas inside and outside of the Infrastructure Boundary)
h) Future residential growth directions proposed to the east (predominantly) and west of the current town
i) Opportunities for intensification/regeneration to be identified
j) New growth directions take into account areas of unacceptable natural hazard risk and areas of significant environmental and cultural values
k) New growth areas to connect into existing sewer and water networks
l) Stormwater Levels of Service designed to meet increased performance requirements

116. At the 2018 Census Rangiora had a population of 17,841, and 7314 total dwellings (incl those unoccupied and under construction). Population projections for the District show an average annual change 2018-2020 of 1700 persons. If Rangiora continues to attract a third of all district growth as stated in the WDSS then Rangiora's population in 2021 will be around 18,900.

Mahaanui Iwi Management Plan

117. Part 1 of the PWDP in a section "Mana Whenua" sets out the position with respect to iwi and the review of the district Plan:

a) The District's territorial area sits within the takiwā (territory) of Ngāi Tūāhuriri which is one of eighteen Ngāi Tahu regional papatipu rūnanga, constituted under the ***Te Rūnanga o Ngāi Tahu Act 1996*** *to represent* ***mana whenua*** *interests.*

b) The preparation and change of a district plan must take into account relevant iwi documents. For the District, Ngāi Tahu has set out its resource management values, issues, objectives and policies within the Mahaanui Iwi Management Plan (2013).

c) The Mahaanui Iwi Management Plan identifies objectives, issues and policies for natural resource and environmental management for six pāpatipu rūnanga (including Te Ngāi Tūāhuriri Rūnanga). It seeks to ensure that the taonga and resources of Ngāi

Tahu mana whenua are recognised and protected in the decision-making of statutory agencies. The Mahaanui Iwi Management Plan contains a comprehensive suite of policies and objectives addressing the range of resource management matters of significance to tangata whenua. The District Council shall have regard to the Mahaanui Iwi Management Plan when preparing or changing the District Plan, to the extent its content has a bearing on resource management issues of the District.

118. The Mahaanui Iwi Management Plan (MIMP) 2013 was released on 1 March 2013.

119. The MIMP is a tool for tangata whenua to express their identity as manawhenua and their objectives as kaitiaki, to protect their taonga and resources, and their relationships with these. The MIMP seeks to ensure that these taonga and resources are recognised and protected in the decision-making of agencies with statutory responsibilities to tangata whenua. Importantly it is also a tool

that assists Papatipu Rūnanga representatives to articulate their values, issues and policy into statutory processes.
120. The MIMP includes both general objectives and policies about the management of land, air, and water, and also includes catchment specific objectives and policies.
121. Section 5.3 Wai Maori (pp77-98) contains an extensive discussion about tangata whenua rights and interests in freshwater. It provides a suite of Issues, Objectives and Policies for freshwater
122. Section 5.4 Papatuanuku (pp101-124) sets out the Ngai Tahu Subdivision and Development Guidelines that are to be read along-side objectives relating to:

a) Land use planning and management in the takiwā reflects the principle of Ki Uta Ki Tai. (from the mountains to the sea)

b) Rural and urban land use occurs in a manner that is consistent with land capability, the assimilative capacity of catchments and the limits and availability of water resources.

c) Inappropriate land use practices that have a significant and unacceptable effect on water quality and quantity are discontinued.

d) Ngāi Tahu has a prominent and influential role in urban planning and development.

e) Subdivision and development activities implement low impact, innovative and sustainable solutions to water, stormwater, waste and energy issues.

123. Section 5.5 Tane (pp127-137) includes objectives that focus on:
a) Regional policy, planning and decision making in the takiwā reflects the particular interest of Ngāi Tahu in indigenous biodiversity protection, and the importance of mahinga kai to Ngāi Tahu culture and traditions.
b) The customary right of Ngāi Tahu to engage in mahinga kai activity is recognised, protected and enhanced…
c) Customary use, and therefore mahinga kai, is given effect to as a first order priority for freshwater management in the takiwā.
124. Section 6.4 (pp213-224) addresses issues of particular significance to the lands and waters of the Waimakariri catchment within which the Site lies.
125. Relevant Objectives relating to urban development of land in that catchment include:

a) The natural "energy, vitality and life" of the Waimakariri River as a braided river is protected and restored.

b) The discharge of contaminants to the Waimakariri and its tributaries is eliminated.

c) Water quality and flows in the Waimakariri and its tributaries are improved to enable whānau and the wider community to have places they can go to swim and fish.

d) The mauri and mahinga kai values of the Waimakariri and its tributaries and associated springs, wetlands and lagoons are protected and restored; mō tātou, ā, mō kā uri ā muri ake nei.

126. A key issue relating to subdivision and development is that subdivision and development activities in the lower catchment have the potential to adversely affect Ngāi Tahu values such as waterways, mahinga kai and sites of significance (Issue Wai4).
127. The proposal provides for full urban reticulation of the three waters and is consistent with the objectives and policies contained in Chapters 5.3 and 5.4 of the MIMP. The proposal does not preclude individual land owners from installing rainwater collection and use from roof areas at the time of building development.
128. The proposal has been designed taking into consideration the potential effect of resultant subdivision and development on the rivers and streams that flow into the lowland rivers.
129. Overall it is considered that the proposal will not have adverse impact on the cultural values of iwi as set out within the MIMP.

SECTION 32 ASSESSMENT

130. A Section 32 assessment is contained in **Appendix 3.**
131. In summary, the PWDP zoning and associated rules (RLZ Zone with a minimum lot size for subdivision and a dwelling 4ha) do not meet the needs and aspirations of the current owners.
132. Strategic Council planning documents (specifically the WDDS) have a focus on only meeting urban growth demands within urban environments of existing towns. They favour intensification (15hh/ha) and a strict allocation of capacity by development areas. It is a control and command regime consistent with Map A of Chapter 6 of the CRPS but is out of step with the requirements of the NPS-UD which requires a more flexible, responsive approach, prohibits a hard fixed unmoveable urban/rural boundary.
133. This approach leaves little room for new proposals or proposals that do not sit square with the standard array of GRZ/medium density or SETZ (Settlement Zone). SETZ applies to some of the District's smaller settlements outside Greater Christchurch.
134. Neither LRZ nor Large Lot Residential (LLRZ) as notified in the PWDP is an efficient use of this block of land located as it is immediately adjoining the urban area of Rangiora, and in a location easily accessible to the town centre by active transport modes as well as car and several district reserves.
135. If this Site is not zoned for LLRZ D2 (minimum average lot size 1500m^2) use to enable residential re-development then it will drive pressure to re-zone elsewhere. That step potentially will not have the significant benefits to Rangiora long term in relation to enabling a well-functioning urban environment that enables people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future. Additionally re-zoning to LLRZ D2 will contribute to providing additional development capacity to meet the different needs of people and communities in a planned manner and

consistent with the NPS-UD.
136. The Site can readily be developed to reflect the principles of the Urban Design Protocol with values of character, context, and connectivity.
137. The Section 32 assessment concludes that the proposal to re-zone the Site from LRZ zone to LLRZ D2 Zone (average lot size 1500m$_2$) is the most appropriate method for achieving the objectives of the proposal, than the other alternatives considered.
138. Option 2 identified in the s 32 assessment is consistent with some PWDP policies notwithstanding that it does sit square with the strategic intentions signaled in the WDDS and the PWDP approach to providing for development capacity and urban development.
139. Option 2 identified in the s 32 assessment to re-zone the Site is the most appropriate given:

a) The proposals adopt the PWDP zones, development and activity standards with appropriate amendments. This ensures continuity of the District Plan anticipated environmental outcomes and urban amenity for Rangiora and adjoining residential areas;

b) Will be consistent with and give effect to many of the relevant PWDP objectives and policies;

c) It is a logical extension to the developed and developing residential land adjoining the Site while achieving a compact, efficient urban form that removes pressure on isolated rural land elsewhere around Rangiora.

d) It gives effect to the NPS-UD, specifically Objective 6 c) and Policy 8, delivering significant additional development capacity and contributing to a well functioning urban environment.

e) It is assumed that there will be capacity in the public utilities and the existing road network, including planned upgrades, to accommodate the traffic effects of the redevelopment;

f) The proposed Site specific ODP will provide certainty of the final form and disposition of the re-zoned area including its proposals for reserves, roading, future linkages for pedestrian and vehicular traffic.

140. The re-zoning proposal is considered to be appropriate to achieve the sustainable growth and development of Rangiora.
141. The economic, social and environmental benefits of the proposed rezoning outweigh any potential costs.
142. The overall efficiency and effectiveness of the proposed rezoning (Option 2) is high, in comparison to the alternative options set out in the s 32 Assessment which are low (Options One and Four) or low to moderate (Option Three).
143. The PWDP proposes to release land for development in the new Development Areas at Rangiora and Kaiaipoi through a novel and untested certification process that is not clearly derived from RMA statutory powers, nor Local Government Act 2002 (LGA) authority. This approach is not proposed for the LLR Overlay areas. As the proposed Lehmans Road LLR D2 zone proposed by this submission seeks large lot urban densities, it is anticipated that Council may favour the certification process if it accepts the proposed rezoning. This is opposed – rezoning to LLRZ D2 is sought.
144. Potential difficulties with the proposed certification process are identified and discussed in the Section 32 Assessment. (**Appendix 3)**. In summary, the process is hugely discretionary, does not provide conventional rights to an applicant (eg right of objection/appeal) meaning decisions cannot be challenged, and it is not apparent that the process will be appropriately documented with a transparent record of the decision-making within the certification process. Further uncertainty arises in the practicalities of how to negotiate and manage the staging, funding and building of key infrastructure across a range of Sites, and a risk that land supply is controlled by a limited number of large developers. It is a far less efficient and effective method for delivering land for housing than the Council rezoning the land in the PWDP.
145. The proposed rezoning is considered to be the most appropriate, efficient and effective means of achieving the purpose of the RMA.

CONSULTATION

146. The landowners and their consultants have submitted on the WRRS and the WDDS (**Appendix 4)**.
147. The submissions to re-zone as rural residential or identify the Site as suitable for LLRZ have been rejected as noted above. LLRZ but at higher densities as now proposed is considered to be a more efficient use of the land and better meets market demand. 5000m^2 sites provide more land is needed for a spacious home and garden.
148. The landowners have been consistent in their wish to find a zone and possible land uses better suited to their needs.

CONCLUSION

173 The submission seeks to rezone 58 ha of land adjoining Rangiora from Lifestyle Rural Zone (LRZ) to Large Lot Residential with a specific density standard (LLRZ D1), minimum average lot size 1500m^2.
149. The Site has a long history of rural lifestyle use. It is not significantly restricted by potential natural hazards especially flooding, nor does it have physical limitations for development for residential purposes as it is not liquefaction prone, and has no known geotechnical limitations but does contain an area of LUC 2 soils. It is near a site of significance to iwi (SASM – 025) being the Rakahuri/Ashley River The Site has access to a collector road and is near to a strategic road giving direct access to the town centre and a range of community amenities and facilities.
150. The Site immediately adjoins the urban area of Rangiora, and is well located to join in to Council utility services. It is well suited for conversion to residential use.
151. The Site is not identified within the westward growth direction for Rangiora in the District Development Strategy 2018 nor is

it part of the DEV-WR development area which adopts Lehmans Road as its western boundary. It is in a location that achieves coherent and compact urban form offering ease of access to business services, community facilities, reserves and the primary road network.
152. The proposed rezoning provides for a connected and high amenity residential living environment not presently available under the PWDP while avoiding and/or mitigating any potential adverse effects on the environment. It will provide for continuing high demand for a variety of high quality residential sections aimed at a particular segment of the housing market in an ideal location, easily accessible to the existing town centre services and facilities. It will broaden the range of housing available. As such, it is consistent with the NPS-UD including Objective 6c) and Policy 8, to be responsive to proposals which supply significant development capacity and contribute to a well functioning urban environment.
153. The use of this Site for residential purposes can be a sustainable and efficient use of land and infrastructure. The proposed rezoning better provides for the social, economic, environmental well-being of the landowners and the Rangiora community than continuation of the current low intensity lifestyle land use on 4ha blocks, or a conventional LLRZ residential use.
154. Any potential adverse effects of the implementation of the proposed rezoning can be assessed at subdivision stage but there has been no restriction on servicing the blocks to date. Capacity will need to be confirmed for infrastructure, power and road network. Any future subdivision of the Site will need to confirm water supply and wastewater treatment and disposal options.
155. Rezoning of the site to LLRZ zone is not inconsistent with the policies and objectives of the PWDP, but it is at odds with the dated CRPS approach to provision of urban growth and housing capacity for Greater Christchurch, to the extent that it is not within an FDA created by Change 1 to the CRPS and is not identified as an LLRZ site under the strategic RRS prepared by the Council.
156. As the proposal helps achieve the purpose of the RMA, and has been shown to be consistent with the relevant provisions of the NPS-UD, the submission can be accepted by Waimakariri District Council.

Original Submission

Summary Reasons for the Submission

The reasons for our submission are outlined below.
a) The preferred relief (**the proposed rezoning**) is both appropriate and necessary to achieve sustainable growth and development of Rangiora and the District and meet the requirements of the National Policy Statement for Urban Development 2020 (**NPS-UD**).
b) The Site identified in Figure 1 and at para 1 of the Preferred Relief above is a logical and preferred location that lends itself to a specific type of housing development not provided within the PWDP as a residential option adjoining but outside the existing urban areas. Nowhere is it possible to develop in a comprehensive, coordinated way a low density, high quality residential environment in the District's towns, the Rural Lifestyle Zone or Settlement Zone as a permitted activity.
c) The requirement for 12/15 hh/ha in GRZ zones (the majority of land in urban areas) drives development to modern scale relatively small urban lots best produced as a package across a significant land holding. The GRZ subdivision standards do not provide for the needs of people who seek a generous sized urban lot residential setting. This is a housing sector that is running against the planning tide of intensification but is, nonetheless, a legitimate form of housing in an appropriate setting. The barriers to such development in urban areas requires an appropriate setting/ location in the rural areas but close to or adjoining the urban areas and at a much lower density than is desired or appropriate (the PWDP LLRZ) to meet the housing needs for generous sized urban lot residential living..
d) The PWDP subdivision standards for LLRZ require lots that are very large for those whose primary interest in a rural setting is a form of residential living, not one that requires significant maintenance and management often involving animals or machinery at scale. Conversely, the GRZ subdivision standards do not provide for the needs of people who seek a large lot residential setting
e) The focus in the PWDP is on prescribing a limited range of residential options and tightly controlling and constraining housing choice within those options. Further urban growth is also tightly constrained and controlled around DEV areas around Rangiora and Kaiapoi but for a very specific form of residential development driven off density requirements that do not match the needs of all landowners.
f) The focus in most new District Plans, driven in part by the National Planning standards, is to simplify the range of zones, to standardize lot sizes, to supposedly create efficiency and certainty through ease of administration of the District Plans. This is done by constraining housing and land development choices by lot size, by location, by built standards and the disposition of built/open elements in a site. However, the National Planning standards do provide for large lot urban residential living, a residential living option which has not been taken up the PWDP (due most likely to the restrictive provisions of the CRPS which only prescribe one from of lower density residential living, at a density of 1-2 hh/ha).
g) This planning approach may be a standard approach to resource allocation but it does not provide a flexible, responsive

approach to innovative and new development options. The Government is creating policy settings that on one hand seek intensification in urban areas, while at the same time pushing away from a land allocation model of planning. The PWDP in striving to face both policy directions has a package of measures that are in fact a major barrier in terms or cost, timeframes and certainties for proposals that are not cut from the suite of housing and development options set out by the PWDP. The allocation of land in preferred development areas, it must be said, runs counter to the Government's push, and now its direction, to free up land for development, to encourage innovation in housing (presently with a focus of intensification) and to make available a range of responses to the need to meet the housing needs of people and communities set out in the NPS-UD.

h) While the weight of demand (and the planning response) is around affordable housing, around small lots and dense development that supports investment in public facilities and amenities such as public and active transport, reserves, and commercial services, there is always a wide spectrum of preferences at play in the housing market. The demand for high quality, generous houses set on generous sized parcels of land within high amenity settings is an important and no less relevant housing sector. There is a strong unmet demand, as confirmed by advice from Bayleys real estate (**Appendix 5**) for larger family homes with room for a pool or similar. Purchasers want to be close the amenities of Rangiora and within walking and cycling distance of local schools. They do not want the only available options – a 4 ha lifestyle block or 5000m^2 rural residential site at Mandeville or Ohoka.

i) Interestingly enough for a nation built on the so-called quarter acre paradise, recent policy and planning interest in housing and land development has now seemingly positioned the 1011m^2 section as a luxury item, as the antithesis of providing for community well-being and needs. It is as though the old quarter acre of itself acts against building a sense of community despite being able to be developed in a planned, structured, coordinated or integrated manner. Rather than being a frivolous discretionary item in land development
and housing choice, a well-planned, well located and properly serviced low density residential environment has much to offer urban environments. They can be tactically used to provide shape and edge to urban areas, they can provide a mass of amenity different from (and potentially complementary to), but no less legitimate in urban outcome terms, to conventional GRZ zoned land.

j) In many ways the approach of a district plan to the role and place of the old quarter acre is not dissimilar to the issues faced by comprehensive retirement villages when first proposed. The idea of dense, almost gated and self-contained communities, with multi storey buildings also did not sit well in many district plans. But now they are accepted as an important part of the urban fabric catering to a specific demographic and health demographic. Most plans enable them.

k) Provision for low density residential in an urban setting, or failing that likelihood, in an adjoining rural zone is a fundamental gap in the district plan.

l) The submission seeks to provide for another housing typology not provided in the PWDP and in a location with significant planning merit. The planning case was made out in a detailed submission to the proposed Rural Residential Strategy (**RRS**) for the land identified in this submission to be "reserved" for conventional Rural Residential zoning in the review of the District Plan. That submission was rejected in favour of a decision ascribing an unspecific strategic significance to Lehmans Road as the urban boundary; simply the decision was that rural residential development here would preclude this area as a future urban growth path, even though this was likely to be very long term as the Waimakariri District Development Strategy (WDDS 2018) for the period up to 2048, does not favour urban growth west of Lehmans Road.

Officer Recommendation

Continue to exclude the area west of Lehmans Road and the racecourse land at Rangiora as growth areas as these were originally considered but not included in the draft RRDS as they trigger the key preliminary criteria of: being on the direct edges of a main town outside of the Projected Infrastructure Boundary (PIB) thereby foreclosing more intensive long-term urban development, and…

Panel Recommendation

The panel accepted the officer recommendations to exclude areas on the fringes of Rangiora in the final RRDS due to these having the potential to foreclose more intensive long-term urban development of the town.

m) In light of the above decision on the Waimakariri Rural Residential Strategy, the proposal now is for a form of high amenity low density urban zoning, which whilst in demand is entirely absent from the PWDP. This will be a long term urban form of development. The proposal set out in the submission will achieve a compact, and efficient, urban form on the edge of Rangiora with excellent connectivity by multiple transport modes. It provides for continuous urban development by enabling a built form which can act as a strong zone or urban boundary.

n) The proposed rezoning will accommodate approximately 311 LLRZ lots1 at the proposed amended density standards for LLRZ D2 (average size 1500m^2). It will contribute to a well-functioning urban environment, meeting the NPS-UD Objective 6(c).

o) Any adverse effects on the environment arising from the proposed rezoning will be minimal, if any, and can be adequately mitigated. A high amenity master planned development is proposed.

p) Significant positive effects arise from the proposed rezoning. It will enable the short term housing demand at Rangiora to be met, and can deliver a housing typology for which there is demand, on lots that are not a burden to the landowners (which is the case for 4ha and the very limited areas of LLRZ D1 with a density of 1-2 hh/ha) and for which there is no provision in the PWDP. At present rates of land uptake there is about 4 years vacant land supply in Rangiora. Given it takes 3-5 years to bring land from zoned state to on the market as developed lots, there is some urgency in providing additional capacity. This proposal helps address an anticipated shortfall in residential zoned plan enabled land.
q) There is no additional cost to the Council in re-zoning the Site as there is expected to be capacity in the public utilities and the existing road network, including planned upgrades.
r) Amendments to PWDP objectives and policies may be necessary to provide for a higher density LLRZ, but of themselves will not act against those relating to Strategic Directions Urban Form and Development and Urban Growth. The PWDP approach to zones and
identification of future development land is already out of step with higher order Resource Management Act 1991 (RMA) statutory documents because they do not give effect to the NPS-UD (and are sought to be amended through this submission).
s) The alternatives of retaining Rural Lifestyle or Large Lot Residential zone across the entire Site are not an efficient use of land which immediately adjoins the urban area of Rangiora, and is highly accessible to the town centre by active transport modes as well as car.
t) The proposed rezoning is consistent with and the most appropriate, efficient and effective means of achieving the purpose of the RMA.

The Site
1. The Site is a 58ha block of land ('the Site') accessed from Lehman Road, Rangiora **(Figure 1)**. It is owned by the two submitters and 12 other landowners.

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1 Assumes 20% of land area taken for servicing including roading, reserves and stormwater management if required.

Figure 1: The site (outlined in blue (Google Earth)

2. The Site is surrounded by RLZ land that is used for a mix of lifestyle and conventional farming. To the NE is the Rangiora Eco Holiday Park, and beyond the Park is the Rangiora Racecourse about 300m away from the nearest lot and 1km from the centre of the Site. Land to the south east is GRZ and part of urban Rangiora with newly developing residential land west of West Belt. About 1.9 km to the NW is Rangiora Airfield. About 1km north of the most northern lot is the Ashley River.
3. The southern-most lot in the proposal with the Rangiora Vet Clinic faces, but does not have access to Rangiora-Oxford Road (State Highway 72). This arterial road provides the main road connection in to the centre of the town. The well-established Fernside Rural residential area is about 2.5km west from the junction of Lehmans and Rangiora-Oxford Roads.

Figure 2: the site is a broader context (Site marked red)

4. The Site is not identified as lying within a preferred growth direction for Rangiora in the Waimakariri 2048 District Development Strategy (2018) (**WDDS**) **(Figure 3)**. No land west of Lehmans Road is included in the West Rangiora Development Area (**DEV-WR**) in the PWDP.

Figure 3: Figure 11 WDDS

5. The Council reviewed its strategic approach to the location and provision of Rural Residential land (now zoned LLRZ in the PWDP) in the WDSS. It adopted the position that it would:

a) Explore tools such as cluster development to manage rural character

b) For rural residential development, adopt an approach that has a primary focus on creating new rural residential areas, with a secondary focus on enabling large lot intensification within existing rural residential areas where there is sufficient community support and servicing available

c) Review the Rural Residential Development Plan for the whole District (pg 21 WDDS).

6. Rangiora presently has a population of 17,841 (2018 Census). It grew steadily between 2006 and 2018. Growth of Rangiora since then has continued in step with the district growth which has increased 8.2% between 2018 and 2021 from 61,300 to 66,300 at an annual average of 2.8% from 2018 to 2020 (Statistics NZ Subnational population projections at 30 June 2021: provisional).

2006 (count)	2013 (count)	2018 (count)
12,165	15,069	17,841

Statistics NZ

Population projections at 30 June

PLANNING STATUS OF THE SITE

Chapter 6 of the Canterbury Regional Policy Statement

7. An assessment of the CRPS is set out in **Appendix 1** to this submission.
8. The Site is within the Greater Christchurch area.
9. It was not shown as a Greenfield Priority Area – Residential (GPA) on Map A of the Canterbury Regional Policy Statement (CRPS). The GPA terminates at Lehmans Road.
10. As a result of the Minister for the Environment's decision of 28 May 2021 on Change 1 to Chapter 6, an area largely south of Oxford Road and a finger of land to the north of Oxford Road was included as a Future Development Area (**FDA**) (**Figure 4** orange).

Figure 4: Map A Chapter 6 Regional Policy Statement Greenfield Priority areas
Site location identified with red circle (appx)

11. The FDAs are intended to accommodate the increased demand for new dwellings in that part of Waimakariri District within the Greater Christchurch Urban Area and to respond to the NPS-UD. They do not provide "plan enabled" land as they need to negotiate a rezoning process to confirm their status as land developable for housing and other urban purposes.
12. The proposal for a LLRZ zone with average lot sizes of 1500m2 is inconsistent with the policy approach of Chapter 6 for Greater Christchurch, in that if fits none of the residential living typologies provided for in Chapter 6 and is not in a location identified for urban or rural residential development. It sits 'between' the urban and rural residential densities provided for in the CRPS (minimum 10 hh/ha for urban in Waimakariri, and average 1-2 hh/ha for rural residential). The proposed density is appx. 6.66 hh/ha.
13. Notwithstanding, the proposal meets all the location and other criteria in CRPS Policy 6.3.9 for rural residential development. It is:

- Outside the CIAL noise contours
- Has some sites with restrictions from the take-off and landing vectors for Rangiora Airfield but not such as to impact its operational capacity.
- Is outside the groundwater protection zone
- Is not within the Waimakariri stop bank system
- Has no views of or to the Port Hills
- Has good access for emergency services
- Will not create reverse sensitivity issues with adjoining land uses; Rangiora Racecourse is 500m away.
- Free of significant natural hazards and is a flat site.
- Supports no significant natural values or ecological values.

• Contains no SASMs.
• Can be integrated into or consolidated with the existing urban area of west Rangiora.
• Contains no surface water bodies so there will be no adverse impacts on these.
• The development will be contingent on an ODP to provide integrated design for subdivision and land use, and provide for the long-term maintenance of a high quality high density rural residential character.
• The proposal is not intended as a staged development towards full urban; rather it is intended to provide a unique residential environment that can stand alone and contribute to the urban fabric of Rangiora like Palmview in east Rangiora, or as Kaiapoi Lakes does for Kaiapoi.

14. Overall, the proposal is not consistent with Chapter 6 but that is more a function of its original purpose when formulated in 2013. Notwithstanding that, the submission for a lower density residential focussed, high quality urban environment that attaches to an existing urban area and that promotes a coordinated pattern of development has planning merit.

Operative Waimakariri District Plan

15. The Site is zoned Rural in the Operative Plan. The minimum lot size for subdivision and a dwelling is 4 ha.

Proposed Waimakariri District Plan

16. The Site is zoned Rural Lifestyle Zone **(LRZ) (Figure 4).** The minimum lot size for subdivision and a dwelling in the LRZ is 4 ha.
17. Oxford Road is a strategic road and Lehmans Road is a collector road.

Figure 5: Proposed District Plan Zoning (site outlined in red)

18. The Site is also subject to, or potentially influenced by, a number of Overlays:
a) Rangiora Airfield Take Off Climb and Approach Obstacle Limitation Surface (**Figure 6**)
b) National Grid Transmission Lines (**Figure 6**)
c) Liquefaction: Liquefaction damage is unlikely (**Figure 6**)
d) Non-Urban Flood Assessment Area (**Figure 7**)
e) Geographic areas: Ecological Area – Plains
f) Ecological District – Low Plains

Figure 6: Rangiora Airfield Take-off and Approach vectors (blue dashed lines); Liquefaction damage unlikely (green)Transmission lines (green lines); Site outlined in red

Figure 7: Non-urban flood assessment & Waimakariri Flood Hazard maps
Blue – medium risk, green – low risk, white – very low

DEVELOPMENT PROPOSAL AND PROPOSED REZONING

19. Subdivision of the Site will create approximately 311 LLRZ D2 lots.
20. The key design drivers for the proposal are:
a) A high amenity premier residential zone with large houses on large sites – average 1500m^2, min 1000m$_2$ based on the St Kilda, Hamilton development concept (**Figure 8**).
b) LLRZ D2 standards would enable a lower density zone in the medium term e.g. 10 years to achieve a high quality consistent character subdivision. If developed as an integrated development subject to an ODP subdivision can be staged for to the proposal.
c) Creating strong connections with the immediate neighbourhood by providing a cohesive interconnected roading layout that picks up direct links to the eastern neighbourhood off Lehmans Road and the northern subdivision roading, and carries them into the Site.
d) Creating a high amenity and diverse residential neighbourhood by providing interfaces to roads, reserves and rural environments.
e) Respecting and building on local identity and character of Rangiora by retaining specific vegetation features from the Site, and anchoring the development into the wider landscape.

21. A development concept can provide for sound urban design by:
a) A hierarchy of movement corridors.
b) Prioritisation of walking and cycling.
c) A north-south alignment of street blocks to maximize solar access and provide for efficient use of lots.

d) Block perimeters being kept as small as practicable to aid permeability and higher public amenity.
e) Enabling a range of housing typologies set in high quality landscape and street setting with generous amenity plantings and curtilage.

Figure 8: St Kilda development images (Bayleys)

22. St Kilda, Cambridge is a premier development on the outskirts of Cambridge, centrally located and with easy access to the Waikato Expressway. It was originally part of a small dairy operation which was dissected by the Waikato Expressway, leaving a portion within the Cambridge Town boundary and the larger balance of the property of approximately 80 ha (which became St Kilda) on the Eastern side of the Expressway, left in the Rural Zone.
23. The initial development concepts were for a Rural Residential type development given the Expressway separation of the existing residential development on the Western side of the Cambridge Bypass, however this was not supported by Council and a new concept of larger residential sections of a 1600m² average size was developed and approved – see https://www.stkilda.nz/page/location/

EFFECTS ON THE ENVIRONMENT

Township growth and urban form

24. The Site immediately adjoins the western edge of urban Rangiora.
25. The WDDS indicated a general preference for the direction of urban growth of Rangiora to the east as a way of balancing up the residential areas around the town centre and some growth to the west.
26. The approach of the WDDS was to signal growth options to be confirmed in the District Plan Review:
The broad directions for greenfield residential growth for the District's main towns are set out in Figures 11 to 14. Further work will be carried out to identify and confirm the exact locations and extent of these residential growth areas, together with the intensification opportunities within existing urban areas. These will be enabled through the District Plan Review and other planning tools.
27. The Strategic Planning documents clearly signal active consideration of growth needs and growth directions. The options available to the Council were constrained by the approach of the CRPS as the District Plan has to give effect to the CRPS and cannot be
inconsistent with it. The CRPS took effect in 2013 and is overdue for review.
28. The CRPS tightly holds urban growth to the constraints of Map A Chapter 6 and the identified FDAs which although amended by Plan Change 1 in 2020 does not respond to the directions of the NPS-UD. In any event the approach is focused on the need for housing in full urban residential land, less on other residential development forms.
29. As such the Site falls outside the planning policy framework for urban growth. However, in terms of urban form and on the ground, there is considerable merit and logic to conversion of this existing LRZ land to a new high amenity residential form that can be integrated into the Rangiora urban fabric.
30. The proposal has the potential to anticipate the longer term growth path confirmed by the decisions on the RRS to protect the future growth option of more intensive urban development in this direction. It can set a pathway to further westward expansion on land
that holds few if any physical barriers to land development.
31. The proposal will contribute to the housing needs of Rangiora and in a form and location that does not undermine the long run urban form of Rangiora. Planned growth confirmed in the PWDP is already intended to extend westwards out to Lehmans Road and to keep the town edge squared up providing depth to future development and providing a rational basis for providing movement networks driven off the key roads such as Rangiora-Oxford Roads. The West Rangiora Future Development Area confirms this approach. The Site sits in the next block west of Lehmans Road so is not proposing a disjointed urban form, nor one that is not part of the long term thinking of urban form and growth for Rangiora.

32. A full residential zoning is proposed under LLRZ D2 and will provide a high quality street character, overall amenity and passive surveillance over the street, and will create the correct lighting standards, roading standard, fully formed footpaths and cycleways required for a high quality urban environment.

Neighbourhood and wider community effects

33. The Site is serviced by a collector road and is close to an arterial road. This provides for ease of access and safe and convenient movement to and from the Site. A planned development co-ordinated by an ODP can facilitate within the site

movement corridors and linkages through the Site to provide for walking and cycling.
34. A key positive neighbourhood and community effect will arise from the existing dwellings and their established gardens and plantings that will anchor new development and provide a point of reference for new dwellings. Development will not be on a bare site; it will take place in an existing established part-residential setting. The transition to a low density, high quality premier residential development will start from a favourable position and minimise the apparent extent and nature of the landscape change.
35. The Site is comparatively large (58.4 ha) and has the potential to support a variety of residential building typologies and this will contribute to a mix of households within the development and provide built form variety and interest in the streetscape. Whilst LLR D2 standards are proposed, it may be that part of the Site is suitable for other higher density forms of development, which would be within scope of the alternative relief, and could be considered as part of the master planning process required for preparation of an ODP (ahead of the hearing). The earlier stages of the St Kilda development were for large lot residential, with more clusters of townhouses included as later stages (and a retirement village). A retirement village is unlikely in this case, given the proximity of the Charles Upham Retirement Village.
36. Rangiora is well-positioned to accommodate and service the needs of a fast-growing resident population that will in turn support more business activity, schools, community facilities and community organisations.

Effects on tangata whenua values
37. The Proposed District Plan does not identify any Sites and Areas of Significance to Maori in the Site, but the nearby Rakahuri/Ashely River identified as SASM-025. This has been scheduled as being
River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species
38. The PWDP has Policy SASM-P8 which is relevant to pre-development processes:
Engagement with rūnanga
Te Ngāi Tūāhuriri Rūnanga and the District Council to encourage engagement with the Rūnanga priorto persons undertaking activities and/or applying for resource consent where the activity has thepotential to adversely affect identified sites or areas of Ngāi Tūāhuriri cultural significance. Where priorengagement with Te Ngāi Tūāhuriri Rūnanga h as not been undertaken by an applicant for an activitythat has the potential to adversely affect an identified site, the District Council will consult with the Rūnanga.
39. The Site is not listed as an archaeological site on the NZ Archaeological Site database.

Landscape and visual effects
40. Rural Lifestyle style development exists on the Site now (a series of 4 ha lots with a dwelling and associated accessory buildings on each). The landscape is dominated by shelter belts, utility buildings, significant trees and planted curtilages around dwellings many of which are well set back off the roads down RoWs.
41. An ODP will help to achieve an integrated, cohesive and coherent development The proposal will lead to a modification of the landscape of the Site from a predominantly lifestyle block landscape to a denser semi-urban environment dominated by residential building that will, in time, get the benefit of street tree and reserve plantings and landscape treatments around the houses.
42. The visual effects which will arise from a change in the number of vegetative and built elements in the landscape are significant, but not avoidable, if the Site is to contribute to the on-going growth of Rangiora. The change will contribute to a high quality amenity and quality of environment and one that will be entirely consistent with and supportive of the rural lifestyle residential development that has successfully established on the Site.

Well-functioning urban environments
43. The Site adjoins the existing built up urban area of Rangiora. Immediately to the east are existing or developing residential areas.
44. The conversion of the Site from present rural lifestyle uses to low density, high quality residential will continue a pattern of outward expansion of Rangiora. Such a change may not be consistent with the PWDP's identification of a Future Development Overlay for west Rangiora only as far west as Lehmans Road, but on the ground it will look and integrate as part of the urban fabric.
45. It will provide some replacement lower density living areas for the existing LLR zones at north west Rangiora – but at much more appropriate higher density that the LLR D1 standard which is 1-2 hh/ha. There are two such areas, shown on the planning maps below. River Road has an 'urban overlay' and is intended to be intensified to urban densities. The land on the opposite (east) side of Lehmans Road is a 'legacy' rural residential zoning which applies under the Operative District Plan. The landowners have developed the adjoining residential subdivision and wish to develop the land for full urban residential development. Services are in place to support this. The constraint to date has been Map A of the CRPS which does not include the land as a Greenfield Priority Area or Future Development Area, GR zoning of this land is consistent with the NPS-UD.

Figure 9: PWDP as notified – LLRZs shown in light grey. Diagonal stripes – urban growth overlay.
Site outlined in red.

46. Rangiora is growing apace. It is attracting significant interest from new home buyers as people respond to the significant investment in upgraded transport links (Northern Corridor and public transport) and a growing economic base for employment within the District and the City.

47. Rangiora has excellent connectivity to the City, both via the new Northern Corridor, and a nascent cycleway link into the City. There is a very regular bus service every half hour.(the No 1 Blue Line) The standard trip takes 70 minutes, and there is a twice daily weekday morning express service from Rangiora, and seven times weekday express out to Rangiora all via Kaiapoi.

48. The Site will step out the western edge of Rangiora, but as it exists in a peri-urban form now, such a change does not alter how the Site interacts with Rangiora as a whole. It is in many ways a functional part of urban Rangiora now; it's only the Zone boundaries and policy framework that create the sense of it not being part of Rangiora.

49. The Site is convenient to the Rakihura/ Ashley recreation trails, the racecourse, Arlington Park, and the airfield. The town centre is easily accessible.

50. The following assessment of the criteria in the NPS-UD for determining a well-functioning urban environment shows that the proposed rezoning will deliver urban, housing and residential outcomes that meet those criteria. There will be a variety of homes enabled by generous lot sizes. The Site is well-positioned, building as it does on an existing township well-serviced by public transport and cycling options, to provide good accessibility to jobs, community services, and open spaces, as well as mitigating climate change impacts and future natural hazards by being not near the coast and well removed from major rivers.

NPS-UD Policy 1

Planning decisions contribute to well functioning urban environments, which are urban environments that, as a minimum:	**Assessment**
(a) have or enable a variety of homes that: (i) meet the needs, in terms of type, price, and location, of different households; and (ii) enable Māori to express their cultural traditions and norms;	The proposal is to have larger lots supporting predominantly standalone dwellings and associated accessory buildings (including generous sized garaging) in an open landscaped garden setting. This will fill a gap in the range of housing typologies available at Rangiora and contribute to a better functioning urban environment overall at Rangiora. It is not necessary for each individual rezoning proposal to have a wide range of housing typologies, and in some circumstances this may not be appropriate. The rezoning will deliver a premier high amenity urban subdivision with generous sized lots which will complement existing and planned higher density residential development at west Rangiora. There is scope with the relief sought for a mix of residential densities. The appropriateness of this can be considered at the master planning/ODP stage. The Site has the potential to create a unique urban environment in Rangiora. It can follow the example of Palmview based on a lake or Kaiapoi Likes providing a niche housing option in Rangiora and the District meeting a need for residential land not constrained to GRZ standards.
(b) N/A business sectors	
(c) have good accessibility for all people between housing, jobs, community services,	The Site has access to a collector road and a strategic road providing easy access to key community amenities and facilities. The town is served by a public bus route to the city, and a cycle trail connecting to Kaiapoi and the City. The new West Rangiora Development Area adjoins the Site to the south. The Site will become closer to Rangiora public transport routes as they extend out to service this new growth area over time.

natural spaces, and open spaces, including by way of public or active transport; and	The Site is in walking distance to Arlington Park and the Rakahuri/Ashley which contains abundant recreations pace. It is easily accessible to the town centre and within walking distance to the Huntingdon Drive local centre.
(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and	The demand for housing and land in Rangiora is largely ahead of the planning means to respond. This proposal will "top up" the land presently set aside in the PWDP and provide a useful buffer to demand. The Site owners have been keen to release this land for more intense development for some time; there is no prospect of land banking.
(e) support reductions in greenhouse gas emissions; and	The Site has significant advantages in being easily accessible to the town centre and reserves, community facilities and schools. The proposal retains a consolidated form to Rangiora with good connectivity and linkages to recreation space and commercial centres reducing the need for car travel.
(f) are resilient to the likely current and future effects of climate change	The Site is within the area of influence of a major river but the non-urban flood assessment maps do not show extensive flooding likely at the Site. Being inland it is not at risk from climate change induced extreme natural hazard events like sea level rise. or river flooding.

Effects on ecosystems and habitats

51. The Site is currently used for a mix of low intensity (grazing) farming, and lifestyle purposes. Shelter belts and utility buildings have been established
52. The Site has been identified in the PWDP with two ecological overlays (the PWDP ecological overlay – Plains and Low Plains Ecological District). They are a district-wide overlays and no specific ecological values have been identified in the Proposed Waimakariri District Plan. These overlays seek primarily to retain indigenous vegetation. The PWDP identifies SASM 025 nearby the Site. That is a Site and Area of Significance to Maori and in SASM - Schedule 1 is identified as *being River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species.*

Effects on natural and physical resources

53. The Site drains in a SE direction towards the newly developing residential area.
54. There will be a degree of site disturbance as part of creating the roading network, and reserves, and as part of curtilage development on each lot.
55. The proposed use for residential activity inevitably leads to loss of some rural productive potential as land owner intentions are not about farming or productive use of the land, but lifestyle use and enjoyment. Built forms and hard surfaces become more dominant.
56. The Site comprises 4ha bocks now and these are not able to be used effectively for productive purposes other than for intensive productions based on tunnel housing and other supported production systems. None exist in the Site now.
57. The Site contains Class 2 and Class 3 soils as defined in the NZ Land Use Inventory (Landcare Research) Land Use Capability classes 1-3 **(Figure 10)**. Productive use of these soils other than for low level purposes i.e. grazing, is not feasible given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production).

Figure 10: Site soils: Site outlined in red; (Canterbury Maps)
Class 2 soils: bright green/Class 3 soils: light green;

Discharges of contaminants into the environment
58. There will be no discharges of contaminants into the environment. Wastewater will discharge to the Council's reticulated system.
59. Stormwater discharges will potentially be to ground given ground conditions or to an approved and consented stormwater management and treatment area which will meet all relevant Council standards.

Risks from natural hazards or hazardous installations
60. The PWDP planning maps show the Site as being within a Non-Urban Flood Assessment Area.
61. The District Plan maps do not identify high flood hazard areas or high coastal flood hazard areas, rather these are identified through the flood assessment certification process. This enables the most up-to-date technical information to be used. However, as a guide, areas that are potentially high hazard can be identified through the Waimakariri District Natural Hazards Interactive Viewer (NH - Introduction).
62. Rules that refer to a Flood Assessment Certificate require a certificate to be obtained from the District Council to determine compliance with the relevant rule. The alternative is to apply for resource consent as set out in the rule.

63. Rule NH-R2 states
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;

64. Assessment of flood risk and consequence can be undertaken at subdivision stage.
65. There will be no hazardous installations proposed on the Site.

Geotechnical assessment
66. The PWDP planning maps show the Site as being "Liquefaction damage is unlikely. Standard investigation procedure outlined in NZS3604 is appropriate".

Contaminated land
67. A Preliminary Site Investigation can be carried out for the Site at subdivision stage.
68. An enquiry of ECAN has identified that two sites at the northern end of the Site potentially contain some contaminated land, which can be investigated further at subdivision stage **(Appendix 6)**. 315 Lehmans Road is an unverified HAIL site (previous use for clay target shooting) and 317 is registered as containing uninvestigated persistent pesticide bulk storage.

Servicing
69. Proposals for servicing the Site and the effects from such servicing in relation to domestic water supply, wastewater, stormwater, roading, and telecommunications will be required for any subdivision consent.

Economic effects
70. It is anticipated that urban development will generate positive economic effects, both from the investigation/development phase and for the longer run economic activity from householders participating in the local economy.

Climate Change effects
71. An assessment of the effects of the proposed rezoning on climate change is included as part of the assessment of a well-functioning urban environment above.
72. A well-functioning urban area that is designed and serviced in an integrated manner, applying sound urban design principles, will enable a reduction in greenhouse gas emissions compared to unplanned, ad hoc development that does not create compact urban forms located where the services and benefits of existing, established urban areas are not readily accessible.
73. There is a triangle of planning influence that can be brought to bear on reducing greenhouse gas emissions
a) Compact urban form minimising distances between homes and work/play options.
b) Proximity of homes to community facilities, services and amenities and business/work areas.
c) Design and provision of movement corridors and linkages that create opportunities other than for vehicles for getting

around.
74. The Site of the proposed rezoning:
a) Helps in retaining a compact urban form to Rangiora.
b) Is easily accessible to the town centre and is located convenient to the recreation resources of the nearby Rakahuri/Ashley River, the airfield and racecourse and Arlington Park.
75. Rangiora has excellent connectivity to the City, both via the Northern Motorway, the new Northern Corridor, a cycle way link to Kaiapoi which is linked to the new north city cycle way along the Northern Corridor and a very regular bus service.

Positive effects
76. The proposed rezoning will provide for the continued growth of Rangiora by managing the development through an ODP. The proposal will provide a buffer to on-going high level demand for lots in Rangiora. It will cater for a specific housing need not found in GRZ Zoned land nor LLRZ land. The proposed rezoning is anticipating a form of development that is a much more efficient use of a qualifying site supporting a well-functioning urban area. It is a positive endorsement of Rangiora as a growth node in the District.
77. The benefits derived from a planned ODP approach include facilitating high levels of connectivity, creating community links to identified focal points. The Site is close to recreation facilities. A coordinated and integrated development will provide a distinctive environmental quality and point of difference to the development.
78. The Site adjoins existing and developing residential development on the western edge of Rangiora.
79. From a community well-being perspective, the provision of additional land for residential growth will continue to support the Council's investment in community infrastructure by maintaining and facilitating growth rates, increasing the rating base and attracting development contributions.

STATUTORY PLANNING ASSESSMENT
80. Submissions must be assessed under the provisions of the RMA, including Part 2 and Section 32 (Requirements for Preparing Evaluation Reports).

National Policy Statements
National Policy Statement on Urban Development Capacity (NPS-UD)

81. The NPS–UD applies to this proposal as it is directed at Tier 1 urban environments, and
Tier 1 local authorities which includes Waimakariri District as part of the Christchurch urban environment that is defined in Table 1 of the NPS, and additionally defined as:
any area of land (regardless of size, and irrespective of local authority or statistical boundaries)
that: is, or is intended to be, predominantly urban in character; and is, or is intended to be, part of
a housing and labour market of at least 10,000 people.
82. The NPS-UD recognises the national significance of:
a) Having well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future; and
b) Providing sufficient development capacity to meet the different needs of people and communities.
83. The NPS outcomes are to be achieved through objectives that address:
a) Planning decisions improving housing affordability by supporting competitive land and development markets.
b) Regional policy statements and district plans enabling more people to live in areas of urban environments near centres or areas with employment opportunities, area well serviced by public transport or a high demand for housing in the area.
c) Urban environments developing and changing over time in response to diverse and changing needs of people, communities and future generations.
d) Local authority decisions on urban development being integrated with infrastructure planning and are strategic over the medium term and long term.
e) Local authority decisions on urban development are responsive particularly for proposals supplying significant development capacity.
f) New Zealand's urban environments support reductions in greenhouse emissions and are resilient to current and future effects of climate change.
84. The key method to achieve these objectives is by development of a Future Development Strategy (FDS). This will set out how the Councils will provide for sufficient development capacity over the next 30 years to meet expected demand. There is no FDS for the greater Christchurch Urban Area that meets the requirements of the NPS-UD.
85. Work on development capacity completed for the NPS - UDC 2016 by the Greater Christchurch Partnership as an Update of the existing Urban Development Strategy (UDS) – Our Space 2019 confirmed what there was a shortage of feasible development capacity for future housing in Waimakariri District for the medium (next 10 years) and long term (10 to 30 years) periods. That assessment is now out of date as it does not address the requirements of the NPS-UD; and rates of take up of land have exceeded projected rates.

86. One of the key changes in the NPS-UD is that local authority decisions on urban development that affects urban environments are responsive, particularly to proposals that would supply significant additional capacity. It also amends the required methodology for housing and business capacity assessments.
87. The current CRPS does not meet the new NPS-UD requirement in relation to proposals for significant additional capacity. Regional councils are required to include criteria in the RPS to determine what plan changes will be treated for the purposes of Policy 8 as adding significantly to development capacity as soon as practicable. ECAN has yet to respond to this requirement.
88. The NPS-UD has immediate effect, so in the meantime, proposals such as this submission must be assessed in the context of the overall intent and purpose of the NPSUD as articulated in the NPS-UD objectives and policies. This includes that NZ has well-functioning environments; provides sufficient development capacity to meet the different needs of people and communities; planning decisions improve housing affordability to contributing to competitive house and land markets; and RMA plans enable more people to live near major employment areas, where there is existing or planned public transport, and where there is high demand for housing.
89. The NPS-UD is the higher order document and its requirements override those of lower order documents where there is a conflict, including regional and district RMA plans.
90. Key objectives and policies in the NPS-UD are assessed here:

NPS-UD Objective/Policy	**Assessment**
Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	The proposed development will further enable Rangiora to sustain itself as a well-functioning urban environment by consolidating the residential area close to the town centre, and provide residential development close to public transport links and existing community and commercial facilities including Huntingdon Drive local centre.
Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.	The proposal provides choices in the Rangiora housing market and in doing so supports housing affordability. Whilst the proposal is for a premier larger lot urban residential development, it is important that all sectors of the market are catered for. This will be more affordable than forcing those wanting large sections out to the much larger and very limited areas of LLR D1 development, or having to purchase 2-3 sections in a standard residential subdivision. There Site is in multiple ownership and the landowners are working together to achieve the rezoning. It will bring more competition into the market by bringing new entrants into the market.
Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply: the area is in or near a centre zone or other area with many employment opportunities the area is well-serviced by existing or planned public transport there is high demand for housing or for business land in the area, relative to other areas within the urban environment.	The CRPS is due for review in 2024 but in the meantime the existing CRPS is not in accordance with the NPS-UD 2020. The proposed rezoning is on the edge of the District's largest centre, which offers a wide range of community and business services, and employment opportunities. It is expected that a proportion of future residents will commute outside the township, but as the township and associated business areas e.g. at Southbrook, continue to grow, this is expected to become proportionally less. Rangiora is well serviced with public transport, there is scope for future mass transit PP, and there is a high demand for housing at Rangiora. The Site adjoins the new West Rangiora Development Area, to the south. Extensions of public transport to service this growth area will be readily accessible to the Site.
Objective 6: Local authority decisions on urban development that affect urban environments are: integrated with infrastructure planning and funding decisions; and strategic over the medium term and long term; and responsive,	Whilst not currently identified as a future growth area in RMA documents, the Site is well placed at the township edge to be serviced by existing infrastructure. Some upgrades may be required, which will be investigated further with Council prior to the hearing. See Policy 8 below for commentary on proposals which supply

particularly in relation to proposals that would supply significant development capacity.	significant development capacity
Objective 8: New Zealand's urban environments: support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change	The proposal adjoins the existing built up are of Rangiora, close to public transport links. Its excellent accessibility to Christchurch City, substantially enhanced with the new Northern Motorway extensions, means it is now highly accessible to these nearby major employment areas. Travel distances are relatively short, minimising vehicle miles and the potential for greenhouse gas emissions. There is a cycleway link from into Christchurch City, and regular bus services, including an express route. The Site is inland and not subject to natural hazard risks associated with sea level rise arising from climate change.
Policy 1 – Planning decisions for well-functioning urban environments	Assessed at para 41-50
Policy 2 - Sufficient development capacity Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.	The proposed rezoning is anticipated to provide sections that will be available for the short term (up to 3 years) and into the medium term (3-10 years) if adopting a more conservative outlook. The locational and amenity advantages of Rangiora also favour strong ongoing demand. The PWDP UFD-O1 Feasible Development Capacity for residential activities identifies the need for 6300 residential units in the period 2018-2028, and 7100 residential units 2028-2048. These numbers are derived from Chapter 6 CRPS Table 6.1. and are out of date. Data from the Council (November 2021) confirms that there are about 800 vacant lots in Rangiora. Building consents are at about 180/year. That means there is about 4 years vacant land supply. A lead in time of 3-5 years is needed to go from rezone to house build so the Council is facing an unnecessary squeeze on land availability. That will translate in to an upward shift in land and section prices as has been the case at Rolleston. The data suggests that the PWDP will be late to the party to ensure there is at least sufficient development capacity to meet expected demand for housing land over the short term, medium term, and long term. There is a looming, inevitable land supply issue so any proposal to add capacity will push the Council closer to meeting the requirements of the NPS-UD. The proposal is consistent with ensuring there is at least sufficient land supply for housing.
Policy 8 – Responsiveness to plan changes Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is: (a) unanticipated by RMA planning	The proposed rezoning is not anticipated by RMA documents - it is not a Greenfield Priority or Future Development Area in the CRPS, or a New Development area in the PWDP. A responsive approach to the proposal is required as it meets the Policy 8 criteria for unanticipated zoning. It will contribution to well functioning urban environments and will add significant development capacity. There is no development capacity for the housing typology proposed – so any provision is significant in this context. The development will deliver appx 311 high amenity large lot residential sites at an average density of 1500m2. This will be higher if a mix

documents; or
(b) out-of-sequence with planned land release

of densities are proposed, which may be appropriate in some parts of the Site, dependent on master planning work to follow.

91. Adopting the submission to re-zone the land, and enable the proposed development on the submission Site will satisfy the objectives and policies of the NPS-UD.

Proposed National Policy Statement for Highly Productive Land (NPS-HPL)

92. The Government proposed in 2019 a NPS-HPL to prevent the loss of productive land and promote its sustainable management. The overall purpose of the proposed NPS-HPL is to improve the way highly-productive land is managed under the Resource Management Act 1991 (RMA) to:

a) Recognise the full range of values and benefits associated with its use for primary production
b) Maintain its availability for primary production for future generations
c) Protect it from inappropriate subdivision, use, and development.

93. The NPS-HPL is still a proposal and not intended to take effect until after Gazettal. At the date of this submission the NPS-HPL has no effect and no assessment of it is required for the purposes of this submission.

94. The Proposed NPS-HPL interim definition of HPL is land defined as Land Use Capability Class 1-3 soils. A portion of the Site contains Class 2 and 3 soils (see **Figure 10)**. Highly productive use of these soils is not realistic given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production). Its present use as lifestyle blocks, low level grazing and agistment is the more likely long run use of the Site if not rezoned.

95. Objective 3 of the Proposed NPS-HPL specifically refers to highly productive soils being protected by avoiding *"uncoordinated urban expansion on highly productive land that has not been subject to a strategic planning process"*. The Site was assessed through a strategic planning process (WDDS 2018) and the RRS as a preferred site for LLRZ development, and rejected for a change in zoning on the basis that it may be required for long term urban growth of Rangiora.

96. It is therefore considered that this submission to re-zone the Site is largely in accordance with the Proposed NPS-HPL.

National Planning Standards

97. The National Planning standards prescribe various matters under the RMA so that there is consistency among planning documents most relevantly here in terms of appellations for zones, and the standards applying to these zones.

98. The proposed rezoning adopts the standard zone appellation, in this case LLRZ as contained in the PWDP.

99. The PWDP identifies plan standards for minimum and average net site areas for the respective zones. These are modified for the proposed rezoning as a higher density LLRZ.

100. The higher density LLR zoning is entirely consistent with the NPS purpose for the LLRZ as reproduced below. In this case, the principal constraint to more intensive development is the peri-urban location where a lower density transition to the rural environment is appropriate (particularly noting that the zone boundary is 'mid block' so there is no natural or physical buffer between rural and residential areas); the existing pattern of 4 ha lots with existing substantial homes and gardens; and the fact that the premier large lot subdivision proposed relies on consistency of housing quality and character to be deliver on this vision for the area.

Large lot residential zone

Areas used predominantly for residential activities and buildings such as detached houses on lots larger than those of the Low density residential and General residential zones, and where there are particular landscape characteristics, physical limitations or other constraints to more intensive development.

Low density residential zone

Areas used predominantly for residential activities and buildings consistent with a suburban scale and subdivision pattern, such as one to two storey houses with yards and landscaping, and other compatible activities.[2]

Canterbury Regional Policy Statement 2013 (CRPS)

101. Chapter 6 of the RPS *"provides a resource management framework for the recovery of Greater Christchurch, to enable and support recovery and rebuilding, including restoration and enhancement, for the area through to 2028. Recovery in Greater Christchurch is also supported by the provisions in Chapter 5 notated as 'Entire Region'. The provisions in the remainder of the RPS also apply.3"*

102. An assessment of the proposed rezoning against the relevant CRPS Objectives and Policies is set out in **Appendix 1**. This should be read in the context of the CRPS being overdue for review and that it does not provide a regional response to the NPS-

UD. The
need to focus on earthquake recovery has now passed and so many of the directive provisions need to be given appropriate 'weight' in a new national policy environment with a focus on flexible, responsive panning approaches that better provide for people's needs and well-being.

103. That assessment shows that

a) The development proposal achieves the objectives for the location, design and function of new developments (Objective 5.2.1)

b) The traffic effects of the proposal are unlikely to give rise to adverse effects and so achieves CRPS objectives for the strategic land transport network (Policy 5.3.7)

c) The Site falls outside the FDAs shown on Map A of Chapter 6 and in that regard is inconsistent with RPS Policy 6.2.1 clauses 1 to 3.

1. identifies priority areas for urban development within Greater Christchurch;

2. identifies Key Activity Centres which provide a focus for high quality, and, where appropriate, mixed-use development that incorporates the principles of good urban design;

3. avoids urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS

d) The environmental effects assessment outlined above establish that the proposed development is consistent and will not give rise to any concerns with respect to all the matters listed in RPS Policy 6.2.1 clauses 4. to 11. These matters are:

6.2.1 Recovery framework

Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that:

1. As above;

2. As above;

3. As above;

4. protects outstanding natural features and landscapes including those within the Port Hills from inappropriate subdivision, use and development;

5. protects and enhances indigenous biodiversity and public space;

6. maintains or improves the quantity and quality of water in groundwater aquifers and surface waterbodies, and quality of ambient air;

7. maintains the character and amenity of rural areas and settlements;

8. protects people from unacceptable risk from natural hazards and the effects of sea-level rise;

9. integrates strategic and other infrastructure and services with land use development;

10. achieves development that does not adversely affect the efficient operation, use, development, appropriate upgrade, and future planning of strategic infrastructure and freight hubs;

11. optimises use of existing infrastructure; and

12. N/A

e) The proposed rezoning achieves policies relating to:

- Sustainability;
- Integration of transport infrastructure and land use;
- Urban design; and
- Biodiversity, natural hazards, landscape, soils, contaminated land.

104. In terms of the CRPS polices for rural residential developments (Policy 6.3.9) the proposal sits square with all policy matters other than being a location identified in an adopted Rural Residential Strategy; and being at a higher density than provided for under this policy (ie greater than 1-2 hh/ha). As such it has a majority of features entirely consistent with the policy.

105. The CRPS includes housing capacity targets as below

6.2.1a Targets for sufficient, feasible development capacity for housing [inserted in accordance with sections 55(2) and 55(A) of the Resource Management Act 1991, from the National Policy Statement on Urban Development Capacity 2016]

For the period 2018-2048, sufficient, feasible development capacity for housing is enabled in Greater Christchurch in accordance with Table 6.1.

Table 6.1 Targets for housing development capacity in Greater Christchurch, 2018-2048

106. These derive from Our Space, under the requirements of the then NPS-Urban Development Capacity 2016, since replaced by the NPS-UD 2020. The targets (known as bottomlines in the NPS-UD) are to be treated as 'minimums' not 'maximums'.

Policy 6.3.12
enables urban development in the Rangiora and Kaiapoi FDAs (new Development Areas in the PWDP) where needed to meet the medium term targets. This a 'minimum' allocation approach contrary to the NPS-UD. The NPS-UD favours over allocation, including in locations unanticipated by RMA plans, where it will add additional development capacity, can be integrated with infrastructure planning and funding, and will contribute to well functioning urban environments – as is the case the proposed Lehmans LLR D2 zone.
107. The proposed Lehmans LLR D2 zone is consistent with the CRPS except with respect to those parts of the CRPS which are out of step with and do not give effect to the higher order plan, the NPS-UD.

Proposed Waimakariri District Plan
108. An assessment of this proposal against the relevant PWDP Objectives and Policies for urban growth and development as notified on 17 September 2021 is set out in **Appendix 2.**
109. That assessment shows that the proposed rezoning is entirely consistent with the relevant objectives and policies, including as sought to be amended by this submission. Those amendments are to UFD-P3 Identification/location and extension of Large Lot Residential Zone areas; and LLRZ-O1 and LLRZ- P1-5 and reflect the intent and outcomes intended for the proposed LLRZ D2 zone, which is a higher density LLRZ zone than the PWDP LLRZ zone (renamed LLRZ D1 in this submission).

ASSESSMENT AGAINST OTHER PLANNING DOCUMENTS
Our Space 2018-2048 Greater Christchurch Settlement Update (2019)
110. Our Space is a non-statutory document prepared under the Local Government Act. It
"responds to the new Government Policy Statement on Land Transport, which has increased funding for mass public transit schemes, and meets the requirement of the National Policy Statement on Urban Development Capacity (NPS-UDC) 2016 to prepare a
future development strategy…. Specifically, it:
• sets out how targets for housing for the next 30 years will be met, accommodating an additional 150,000 people;
• identifies locations for housing growth, encouraging Central City and suburban centre living while providing for township growth in Rolleston, Rangiora and Kaiapoi;…
• promotes a compact urban form, which provides for efficient transport and locates development in a manner that takes into account climate change and sea level rise.[4].

..Underpinning this settlement pattern approach is the vision for a transformation of the transport network that fosters much greater public and active transport usage, and reduced reliance on the private vehicle.
111. Our Space acknowledges that this will require commitment from the Government to invest in the necessary improvements to our transport system, which could include investing in rapid transit services. To date, there has been no successful business case for improved public transportation, including not as a Covid 19 fast track infrastructure project.
112. The Our Space housing capacity targets (Table 3) and Future Development Areas are related to growth of urban areas.
113. Our Space, like the CRPS (and the Operative District Plan) are now out of date, as they do not reflect or give effect to the new requirements of the NPS-UD.

Waimakariri 2048 District Development Strategy (WDDS)
114. The preferred growth directions for Rangiora in the WDDS 2048 (2018) are outlined above (under 'Site') i.e. westwards to Lehmans Road, and otherwise eastwards. However, the Council in its decision on the RRS, recognized west of Lehmmans Road as a potential longer town urban growth area.
115. The WDDS Rangiora Snapshot (pp38-39) -when looking ahead to 2048 proposed that:
a) Rangiora remains the District's largest town
b) 30,000 – estimated population (2048)
c) 12,025 – estimated households
d) 5,025 - new households in Rangiora
e) Continues to accommodate one third of the District's residential growth
f) 167 – estimated annual building consents for new dwellings for the next 30 years
g) 423 hectares of additional feasible residential land required by 2048 (this includes capacity in remaining stages of existing residential developments as well as new greenfield areas inside and outside of the Infrastructure Boundary)
h) Future residential growth directions proposed to the east (predominantly) and west of the current town
i) Opportunities for intensification/regeneration to be identified
j) New growth directions take into account areas of unacceptable natural hazard risk and areas of significant environmental and cultural values
k) New growth areas to connect into existing sewer and water networks

l) Stormwater Levels of Service designed to meet increased performance requirements

116. At the 2018 Census Rangiora had a population of 17,841, and 7314 total dwellings (incl those unoccupied and under construction). Population projections for the District show an average annual change 2018-2020 of 1700 persons. If Rangiora continues to attract a third of all district growth as stated in the WDSS then Rangiora's population in 2021 will be around 18,900.

Mahaanui Iwi Management Plan

117. Part 1 of the PWDP in a section "Mana Whenua" sets out the position with respect to iwi and the review of the district Plan:

a) The District's territorial area sits within the takiwā (territory) of Ngāi Tūāhuriri which is one of eighteen Ngāi Tahu regional papatipu rūnanga, constituted under the ***Te Rūnanga o Ngāi Tahu Act 1996*** *to represent* ***mana whenua*** *interests.*

b) The preparation and change of a district plan must take into account relevant iwi documents. For the District, Ngāi Tahu has set out its resource management values, issues, objectives and policies within the Mahaanui Iwi Management Plan (2013).

c) The Mahaanui Iwi Management Plan identifies objectives, issues and policies for natural resource and environmental management for six pāpatipu rūnanga (including Te Ngāi Tūāhuriri Rūnanga). It seeks to ensure that the taonga and resources of Ngāi

Tahu mana whenua are recognised and protected in the decision-making of statutory agencies. The Mahaanui Iwi Management Plan contains a comprehensive suite of policies and objectives addressing the range of resource management matters of significance to tangata whenua. The District Council shall have regard to the Mahaanui Iwi Management Plan when preparing or changing the District Plan, to the extent its content has a bearing on resource management issues of the District.

118. The Mahaanui Iwi Management Plan (MIMP) 2013 was released on 1 March 2013.

119. The MIMP is a tool for tangata whenua to express their identity as manawhenua and their objectives as kaitiaki, to protect their taonga and resources, and their relationships with these. The MIMP seeks to ensure that these taonga and resources are recognised and protected in the decision-making of agencies with statutory responsibilities to tangata whenua. Importantly it is also a tool that assists Papatipu Rūnanga representatives to articulate their values, issues and policy into statutory processes.

120. The MIMP includes both general objectives and policies about the management of land, air, and water, and also includes catchment specific objectives and policies.

121. Section 5.3 Wai Maori (pp77-98) contains an extensive discussion about tangata whenua rights and interests in freshwater. It provides a suite of Issues, Objectives and Policies for freshwater

122. Section 5.4 Papatuanuku (pp101-124) sets out the Ngai Tahu Subdivision and Development Guidelines that are to be read along-side objectives relating to:

a) Land use planning and management in the takiwā reflects the principle of Ki Uta Ki Tai. (from the mountains to the sea)

b) Rural and urban land use occurs in a manner that is consistent with land capability, the assimilative capacity of catchments and the limits and availability of water resources.

c) Inappropriate land use practices that have a significant and unacceptable effect on water quality and quantity are discontinued.

d) Ngāi Tahu has a prominent and influential role in urban planning and development.

e) Subdivision and development activities implement low impact, innovative and sustainable solutions to water, stormwater, waste and energy issues.

123. Section 5.5 Tane (pp127-137) includes objectives that focus on:

a) Regional policy, planning and decision making in the takiwā reflects the particular interest of Ngāi Tahu in indigenous biodiversity protection, and the importance of mahinga kai to Ngāi Tahu culture and traditions.

b) The customary right of Ngāi Tahu to engage in mahinga kai activity is recognised, protected and enhanced…

c) Customary use, and therefore mahinga kai, is given effect to as a first order priority for freshwater management in the takiwā.

124. Section 6.4 (pp213-224) addresses issues of particular significance to the lands and waters of the Waimakariri catchment within which the Site lies.

125. Relevant Objectives relating to urban development of land in that catchment include:

a) The natural "energy, vitality and life" of the Waimakariri River as a braided river is protected and restored.

b) The discharge of contaminants to the Waimakariri and its tributaries is eliminated.

c) Water quality and flows in the Waimakariri and its tributaries are improved to enable whānau and the wider community to have places they can go to swim and fish.

d) The mauri and mahinga kai values of the Waimakariri and its tributaries and associated springs, wetlands and lagoons are protected and restored; mō tātou, ā, mō kā uri ā muri ake nei.

126. A key issue relating to subdivision and development is that subdivision and development activities in the lower catchment

have the potential to adversely affect Ngāi Tahu values such as waterways, mahinga kai and sites of significance (Issue Wai4).
127. The proposal provides for full urban reticulation of the three waters and is consistent with the objectives and policies contained in Chapters 5.3 and 5.4 of the MIMP. The proposal does not preclude individual land owners from installing rainwater collection and use from roof areas at the time of building development.
128. The proposal has been designed taking into consideration the potential effect of resultant subdivision and development on the rivers and streams that flow into the lowland rivers.
129. Overall it is considered that the proposal will not have adverse impact on the cultural values of iwi as set out within the MIMP.

SECTION 32 ASSESSMENT

130. A Section 32 assessment is contained in **Appendix 3.**
131. In summary, the PWDP zoning and associated rules (RLZ Zone with a minimum lot size for subdivision and a dwelling 4ha) do not meet the needs and aspirations of the current owners.
132. Strategic Council planning documents (specifically the WDDS) have a focus on only meeting urban growth demands within urban environments of existing towns. They favour intensification (15hh/ha) and a strict allocation of capacity by development areas. It is a control and command regime consistent with Map A of Chapter 6 of the CRPS but is out of step with the requirements of the NPS-UD which requires a more flexible, responsive approach, prohibits a hard fixed unmoveable urban/rural boundary.
133. This approach leaves little room for new proposals or proposals that do not sit square with the standard array of GRZ/medium density or SETZ (Settlement Zone). SETZ applies to some of the District's smaller settlements outside Greater Christchurch.
134. Neither LRZ nor Large Lot Residential (LLRZ) as notified in the PWDP is an efficient use of this block of land located as it is immediately adjoining the urban area of Rangiora, and in a location easily accessible to the town centre by active transport modes as well as car and several district reserves.
135. If this Site is not zoned for LLRZ D2 (minimum average lot size 1500m^2) use to enable residential re-development then it will drive pressure to re-zone elsewhere. That step potentially will not have the significant benefits to Rangiora long term in relation to enabling a well-functioning urban environment that enables people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future. Additionally re-zoning to LLRZ D2 will contribute to providing additional development capacity to meet the different needs of people and communities in a planned manner and consistent with the NPS-UD.
136. The Site can readily be developed to reflect the principles of the Urban Design Protocol with values of character, context, and connectivity.
137. The Section 32 assessment concludes that the proposal to re-zone the Site from LRZ zone to LLRZ D2 Zone (average lot size 1500m_2) is the most appropriate method for achieving the objectives of the proposal, than the other alternatives considered.
138. Option 2 identified in the s 32 assessment is consistent with some PWDP policies notwithstanding that it does sit square with the strategic intentions signaled in the WDDS and the PWDP approach to providing for development capacity and urban development.
139. Option 2 identified in the s 32 assessment to re-zone the Site is the most appropriate given:
a) The proposals adopt the PWDP zones, development and activity standards with appropriate amendments. This ensures continuity of the District Plan anticipated environmental outcomes and urban amenity for Rangiora and adjoining residential areas;
b) Will be consistent with and give effect to many of the relevant PWDP objectives and policies;
c) It is a logical extension to the developed and developing residential land adjoining the Site while achieving a compact, efficient urban form that removes pressure on isolated rural land elsewhere around Rangiora.
d) It gives effect to the NPS-UD, specifically Objective 6 c) and Policy 8, delivering significant additional development capacity and contributing to a well functioning urban environment.
e) It is assumed that there will be capacity in the public utilities and the existing road network, including planned upgrades, to accommodate the traffic effects of the redevelopment;
f) The proposed Site specific ODP will provide certainty of the final form and disposition of the re-zoned area including its proposals for reserves, roading, future linkages for pedestrian and vehicular traffic.
140. The re-zoning proposal is considered to be appropriate to achieve the sustainable growth and development of Rangiora.
141. The economic, social and environmental benefits of the proposed rezoning outweigh any potential costs.
142. The overall efficiency and effectiveness of the proposed rezoning (Option 2) is high, in comparison to the alternative options set out in the s 32 Assessment which are low (Options One and Four) or low to moderate (Option Three).
143. The PWDP proposes to release land for development in the new Development Areas at Rangiora and Kaiapoi through a novel and untested certification process that is not clearly derived from RMA statutory powers, nor Local Government Act 2002 (LGA) authority. This approach is not proposed for the LLR Overlay areas. As the proposed Lehmans Road LLR D2 zone proposed by this submission seeks large lot urban densities, it is anticipated that Council may favour the certification process if it accepts the proposed rezoning. This is opposed – rezoning to LLRZ D2 is sought.
144. Potential difficulties with the proposed certification process are identified and discussed in the Section 32 Assessment.

(**Appendix 3)**. In summary, the process is hugely discretionary, does not provide conventional rights to an applicant (eg right of objection/appeal) meaning decisions cannot be challenged, and it is not apparent that the process will be appropriately documented with a transparent record of the decision-making within the certification process. Further uncertainty arises in the practicalities of how to negotiate and manage the staging, funding and building of key infrastructure across a range of Sites, and a risk that land supply is controlled by a limited number of large developers. It is a far less efficient and effective method for delivering land for housing than the Council rezoning the land in the PWDP.
145. The proposed rezoning is considered to be the most appropriate, efficient and effective means of achieving the purpose of the RMA.

CONSULTATION
146. The landowners and their consultants have submitted on the WRRS and the WDDS (**Appendix 4)**.
147. The submissions to re-zone as rural residential or identify the Site as suitable for LLRZ have been rejected as noted above. LLRZ but at higher densities as now proposed is considered to be a more efficient use of the land and better meets market demand. 5000m^2 sites provide more land is needed for a spacious home and garden.
148. The landowners have been consistent in their wish to find a zone and possible land uses better suited to their needs.

CONCLUSION

173 The submission seeks to rezone 58 ha of land adjoining Rangiora from Lifestyle Rural Zone (LRZ) to Large Lot Residential with a specific density standard (LLRZ D1), minimum average lot size 1500m^2.
149. The Site has a long history of rural lifestyle use. It is not significantly restricted by potential natural hazards especially flooding, nor does it have physical limitations for development for residential purposes as it is not liquefaction prone, and has no known geotechnical limitations but does contain an area of LUC 2 soils. It is near a site of significance to iwi (SASM – 025) being the Rakahuri/Ashley River The Site has access to a collector road and is near to a strategic road giving direct access to the town centre and a range of community amenities and facilities.
150. The Site immediately adjoins the urban area of Rangiora, and is well located to join in to Council utility services. It is well suited for conversion to residential use.
151. The Site is not identified within the westward growth direction for Rangiora in the District Development Strategy 2018 nor is it part of the DEV-WR development area which adopts Lehmans Road as its western boundary. It is in a location that achieves coherent and compact urban form offering ease of access to business services, community facilities, reserves and the primary road network.
152. The proposed rezoning provides for a connected and high amenity residential living environment not presently available under the PWDP while avoiding and/or mitigating any potential adverse effects on the environment. It will provide for continuing high demand for a variety of high quality residential sections aimed at a particular segment of the housing market in an ideal location, easily accessible to the existing town centre services and facilities. It will broaden the range of housing available. As such, it is consistent with the NPS-UD including Objective 6c) and Policy 8, to be responsive to proposals which supply significant development capacity and contribute to a well functioning urban environment.
153. The use of this Site for residential purposes can be a sustainable and efficient use of land and infrastructure. The proposed rezoning better provides for the social, economic, environmental well-being of the landowners and the Rangiora community than continuation of the current low intensity lifestyle land use on 4ha blocks, or a conventional LLRZ residential use.
154. Any potential adverse effects of the implementation of the proposed rezoning can be assessed at subdivision stage but there has been no restriction on servicing the blocks to date. Capacity will need to be confirmed for infrastructure, power and road network. Any future subdivision of the Site will need to confirm water supply and wastewater treatment and disposal options.
155. Rezoning of the site to LLRZ zone is not inconsistent with the policies and objectives of the PWDP, but it is at odds with the dated CRPS approach to provision of urban growth and housing capacity for Greater Christchurch, to the extent that it is not within an FDA created by Change 1 to the CRPS and is not identified as an LLRZ site under the strategic RRS prepared by the Council.
156. As the proposal helps achieve the purpose of the RMA, and has been shown to be consistent with the relevant provisions of the NPS-UD, the submission can be accepted by Waimakariri District Council.

Original Submission

Summary Reasons for the Submission

The reasons for our submission are outlined below.
a) The preferred relief (**the proposed rezoning**) is both appropriate and necessary to achieve sustainable growth and

development of Rangiora and the District and meet the requirements of the National Policy Statement for Urban Development 2020 (**NPS-UD**).

b) The Site identified in Figure 1 and at para 1 of the Preferred Relief above is a logical and preferred location that lends itself to a specific type of housing development not provided within the PWDP as a residential option adjoining but outside the existing urban areas. Nowhere is it possible to develop in a comprehensive, coordinated way a low density, high quality residential environment in the District's towns, the Rural Lifestyle Zone or Settlement Zone as a permitted activity.

c) The requirement for 12/15 hh/ha in GRZ zones (the majority of land in urban areas) drives development to modern scale relatively small urban lots best produced as a package across a significant land holding. The GRZ subdivision standards do not provide for the needs of people who seek a generous sized urban lot residential setting. This is a housing sector that is running against the planning tide of intensification but is, nonetheless, a legitimate form of housing in an appropriate setting. The barriers to such development in urban areas requires an appropriate setting/ location in the rural areas but close to or adjoining the urban areas and at a much lower density than is desired or appropriate (the PWDP LLRZ) to meet the housing needs for generous sized urban lot residential living..

d) The PWDP subdivision standards for LLRZ require lots that are very large for those whose primary interest in a rural setting is a form of residential living, not one that requires significant maintenance and management often involving animals or machinery at scale. Conversely, the GRZ subdivision standards do not provide for the needs of people who seek a large lot residential setting

e) The focus in the PWDP is on prescribing a limited range of residential options and tightly controlling and constraining housing choice within those options. Further urban growth is also tightly constrained and controlled around DEV areas around Rangiora and Kaiapoi but for a very specific form of residential development driven off density requirements that do not match the needs of all landowners.

f) The focus in most new District Plans, driven in part by the National Planning standards, is to simplify the range of zones, to standardize lot sizes, to supposedly create efficiency and certainty through ease of administration of the District Plans. This is done by constraining housing and land development choices by lot size, by location, by built standards and the disposition of built/open elements in a site. However, the National Planning standards do provide for large lot urban residential living, a residential living option which has not been taken up the PWDP (due most likely to the restrictive provisions of the CRPS which only prescribe one from of lower density residential living, at a density of 1-2 hh/ha).

g) This planning approach may be a standard approach to resource allocation but it does not provide a flexible, responsive approach to innovative and new development options. The Government is creating policy settings that on one hand seek intensification in urban areas, while at the same time pushing away from a land allocation model of planning. The PWDP in striving to face both policy directions has a package of measures that are in fact a major barrier in terms or cost, timeframes and certainties for proposals that are not cut from the suite of housing and development options set out by the PWDP. The allocation of land in preferred development areas, it must be said, runs counter to the Government's push, and now its direction, to free up land for development, to encourage innovation in housing (presently with a focus of intensification) and to make available a range of responses to the need to meet the housing needs of people and communities set out in the NPS-UD.

h) While the weight of demand (and the planning response) is around affordable housing, around small lots and dense development that supports investment in public facilities and amenities such as public and active transport, reserves, and commercial services, there is always a wide spectrum of preferences at play in the housing market. The demand for high quality, generous houses set on generous sized parcels of land within high amenity settings is an important and no less relevant housing sector. There is a strong unmet demand, as confirmed by advice from Bayleys real estate (**Appendix 5**) for larger family homes with room for a pool or similar. Purchasers want to be close the amenities of Rangiora and within walking and cycling distance of local schools. They do not want the only available options – a 4 ha lifestyle block or 5000m^2 rural residential site at Mandeville or Ohoka.

i) Interestingly enough for a nation built on the so-called quarter acre paradise, recent policy and planning interest in housing and land development has now seemingly positioned the 1011m^2 section as a luxury item, as the antithesis of providing for community well-being and needs. It is as though the old quarter acre of itself acts against building a sense of community despite being able to be developed in a planned, structured, coordinated or integrated manner. Rather than being a frivolous discretionary item in land development
and housing choice, a well-planned, well located and properly serviced low density residential environment has much to offer urban environments. They can be tactically used to provide shape and edge to urban areas, they can provide a mass of amenity different from (and potentially complementary to), but no less legitimate in urban outcome terms, to conventional GRZ zoned land.

j) In many ways the approach of a district plan to the role and place of the old quarter acre is not dissimilar to the issues faced by comprehensive retirement villages when first proposed. The idea of dense, almost gated and self-contained communities, with multi storey buildings also did not sit well in many district plans. But now they are accepted as an important part of the urban fabric catering to a specific demographic and health demographic. Most plans enable them.

k) Provision for low density residential in an urban setting, or failing that likelihood, in an adjoining rural zone is a fundamental gap in the district plan.

l) The submission seeks to provide for another housing typology not provided in the PWDP and in a location with significant planning merit. The planning case was made out in a detailed submission to the proposed Rural Residential Strategy (**RRS**) for

the land identified in this submission to be “reserved” for conventional Rural Residential zoning in the review of the District Plan. That submission was rejected in favour of a decision ascribing an unspecific strategic significance to Lehmans Road as the urban boundary; simply the decision was that rural residential development here would preclude this area as a future urban growth path, even though this was likely to be very long term as the Waimakariri District Development Strategy (WDDS 2018) for the period up to 2048, does not favour urban growth west of Lehmans Road.

Officer Recommendation

Continue to exclude the area west of Lehmans Road and the racecourse land at Rangiora as growth areas as these were originally considered but not included in the draft RRDS as they trigger the key preliminary criteria of: being on the direct edges of a main town outside of the Projected Infrastructure Boundary (PIB) thereby foreclosing more intensive long-term urban development, and…

Panel Recommendation

The panel accepted the officer recommendations to exclude areas on the fringes of Rangiora in the final RRDS due to these having the potential to foreclose more intensive long-term urban development of the town.

m) In light of the above decision on the Waimakariri Rural Residential Strategy, the proposal now is for a form of high amenity low density urban zoning, which whilst in demand is entirely absent from the PWDP. This will be a long term urban form of development. The proposal set out in the submission will achieve a compact, and efficient, urban form on the edge of Rangiora with excellent connectivity by multiple transport modes. It provides for continuous urban development by enabling a built form which can act as a strong zone or urban boundary.

n) The proposed rezoning will accommodate approximately 311 LLRZ lots1 at the proposed amended density standards for LLRZ D2 (average size 1500m^2). It will contribute to a well-functioning urban environment, meeting the NPS-UD Objective 6(c).

o) Any adverse effects on the environment arising from the proposed rezoning will be minimal, if any, and can be adequately mitigated. A high amenity master planned development is proposed.

p) Significant positive effects arise from the proposed rezoning. It will enable the short term housing demand at Rangiora to be met, and can deliver a housing typology for which there is demand, on lots that are not a burden to the landowners (which is the case for 4ha and the very limited areas of LLRZ D1 with a density of 1-2 hh/ha) and for which there is no provision in the PWDP. At present rates of land uptake there is about 4 years vacant land supply in Rangiora. Given it takes 3-5 years to bring land from zoned state to on the market as developed lots, there is some urgency in providing additional capacity. This proposal helps address an anticipated shortfall in residential zoned plan enabled land.

q) There is no additional cost to the Council in re-zoning the Site as there is expected to be capacity in the public utilities and the existing road network, including planned upgrades.

r) Amendments to PWDP objectives and policies may be necessary to provide for a higher density LLRZ, but of themselves will not act against those relating to Strategic Directions Urban Form and Development and Urban Growth. The PWDP approach to zones and
identification of future development land is already out of step with higher order Resource Management Act 1991 (RMA) statutory documents because they do not give effect to the NPS-UD (and are sought to be amended through this submission).

s) The alternatives of retaining Rural Lifestyle or Large Lot Residential zone across the entire Site are not an efficient use of land which immediately adjoins the urban area of Rangiora, and is highly accessible to the town centre by active transport modes as well as car.

t) The proposed rezoning is consistent with and the most appropriate, efficient and effective means of achieving the purpose of the RMA.

The Site

1. The Site is a 58ha block of land (‘the Site’) accessed from Lehman Road, Rangiora **(Figure 1)**. It is owned by the two submitters and 12 other landowners.

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1 Assumes 20% of land area taken for servicing including roading, reserves and stormwater management if required.

Figure 1: The site (outlined in blue (Google Earth)

2. The Site is surrounded by RLZ land that is used for a mix of lifestyle and conventional farming. To the NE is the Rangiora Eco Holiday Park, and beyond the Park is the Rangiora Racecourse about 300m away from the nearest lot and 1km from the centre of the Site. Land to the south east is GRZ and part of urban Rangiora with newly developing residential land west of West Belt. About 1.9 km to the NW is Rangiora Airfield. About 1km north of the most northern lot is the Ashley River.
3. The southern-most lot in the proposal with the Rangiora Vet Clinic faces, but does not have access to Rangiora-Oxford Road (State Highway 72). This arterial road provides the main road connection in to the centre of the town. The well-established Fernside Rural residential area is about 2.5km west from the junction of Lehmans and Rangiora-Oxford Roads.

Figure 2: the site is a broader context (Site marked red)

4. The Site is not identified as lying within a preferred growth direction for Rangiora in the Waimakariri 2048 District Development Strategy (2018) (**WDDS**) **(Figure 3)**. No land west of Lehmans Road is included in the West Rangiora Development Area (**DEV-WR**) in the PWDP.

Figure 3: Figure 11 WDDS

5. The Council reviewed its strategic approach to the location and provision of Rural Residential land (now zoned LLRZ in the PWDP) in the WDSS. It adopted the position that it would:

a) Explore tools such as cluster development to manage rural character

b) For rural residential development, adopt an approach that has a primary focus on creating new rural residential areas, with a secondary focus on enabling large lot intensification within existing rural residential areas where there is sufficient community support and servicing available

c) Review the Rural Residential Development Plan for the whole District (pg 21 WDDS).

6. Rangiora presently has a population of 17,841 (2018 Census). It grew steadily between 2006 and 2018. Growth of Rangiora since then has continued in step with the district growth which has increased 8.2% between 2018 and 2021 from 61,300 to 66,300 at an annual average of 2.8% from 2018 to 2020 (Statistics NZ Subnational population projections at 30 June 2021: provisional).

2006 (count)	2013 (count)	2018 (count)
12,165	15,069	17,841

Statistics NZ

Population projections at 30 June

PLANNING STATUS OF THE SITE

Chapter 6 of the Canterbury Regional Policy Statement

7. An assessment of the CRPS is set out in **Appendix 1** to this submission.
8. The Site is within the Greater Christchurch area.
9. It was not shown as a Greenfield Priority Area – Residential (GPA) on Map A of the Canterbury Regional Policy Statement (CRPS). The GPA terminates at Lehmans Road.
10. As a result of the Minister for the Environment's decision of 28 May 2021 on Change 1 to Chapter 6, an area largely south of Oxford Road and a finger of land to the north of Oxford Road was included as a Future Development Area (**FDA**) (**Figure 4** orange).

Figure 4: Map A Chapter 6 Regional Policy Statement Greenfield Priority areas
Site location identified with red circle (appx)

11. The FDAs are intended to accommodate the increased demand for new dwellings in that part of Waimakariri District within the Greater Christchurch Urban Area and to respond to the NPS-UD. They do not provide "plan enabled" land as they need to negotiate a rezoning process to confirm their status as land developable for housing and other urban purposes.
12. The proposal for a LLRZ zone with average lot sizes of 1500m2 is inconsistent with the policy approach of Chapter 6 for Greater Christchurch, in that if fits none of the residential living typologies provided for in Chapter 6 and is not in a location identified for urban or rural residential development. It sits 'between' the urban and rural residential densities provided for in the CRPS (minimum 10 hh/ha for urban in Waimakariri, and average 1-2 hh/ha for rural residential). The proposed density is appx. 6.66 hh/ha.
13. Notwithstanding, the proposal meets all the location and other criteria in CRPS Policy 6.3.9 for rural residential development. It is:

- Outside the CIAL noise contours
- Has some sites with restrictions from the take-off and landing vectors for Rangiora Airfield but not such as to impact its operational capacity.
- Is outside the groundwater protection zone
- Is not within the Waimakariri stop bank system
- Has no views of or to the Port Hills
- Has good access for emergency services
- Will not create reverse sensitivity issues with adjoining land uses; Rangiora Racecourse is 500m away.
- Free of significant natural hazards and is a flat site.
- Supports no significant natural values or ecological values.
- Contains no SASMs.
- Can be integrated into or consolidated with the existing urban area of west Rangiora.
- Contains no surface water bodies so there will be no adverse impacts on these.
- The development will be contingent on an ODP to provide integrated design for subdivision and land use, and provide for the long-term maintenance of a high quality high density rural residential character.
- The proposal is not intended as a staged development towards full urban; rather it is intended to provide a unique residential environment that can stand alone and contribute to the urban fabric of Rangiora like Palmview in east Rangiora, or as Kaiapoi Lakes does for Kaiapoi.

14. Overall, the proposal is not consistent with Chapter 6 but that is more a function of its original purpose when formulated in 2013. Notwithstanding that, the submission for a lower density residential focussed, high quality urban environment that attaches to an existing urban area and that promotes a coordinated pattern of development has planning merit.

Operative Waimakariri District Plan
15. The Site is zoned Rural in the Operative Plan. The minimum lot size for subdivision and a dwelling is 4 ha.
Proposed Waimakariri District Plan
16. The Site is zoned Rural Lifestyle Zone **(LRZ) (Figure 4).** The minimum lot size for subdivision and a dwelling in the LRZ is 4 ha.
17. Oxford Road is a strategic road and Lehmans Road is a collector road.

Figure 5: Proposed District Plan Zoning (site outlined in red)

18. The Site is also subject to, or potentially influenced by, a number of Overlays:
    a) Rangiora Airfield Take Off Climb and Approach Obstacle Limitation Surface (**Figure 6**)
    b) National Grid Transmission Lines (**Figure 6**)
    c) Liquefaction: Liquefaction damage is unlikely (**Figure 6**)
    d) Non-Urban Flood Assessment Area (**Figure 7**)
    e) Geographic areas: Ecological Area – Plains

f) Ecological District – Low Plains

Figure 6: Rangiora Airfield Take-off and Approach vectors (blue dashed lines); Liquefaction damage unlikely (green)Transmission lines (green lines); Site outlined in red

Figure 7: Non-urban flood assessment & Waimakariri Flood Hazard maps
Blue – medium risk, green – low risk, white – very low

DEVELOPMENT PROPOSAL AND PROPOSED REZONING

19. Subdivision of the Site will create approximately 311 LLRZ D2 lots.
20. The key design drivers for the proposal are:

a) A high amenity premier residential zone with large houses on large sites – average 1500m^2, min 1000m$_2$ based on the St Kilda, Hamilton development concept (**Figure 8**).

b) LLRZ D2 standards would enable a lower density zone in the medium term e.g. 10 years to achieve a high quality consistent character subdivision. If developed as an integrated development subject to an ODP subdivision can be staged for to the proposal.

c) Creating strong connections with the immediate neighbourhood by providing a cohesive interconnected roading layout that picks up direct links to the eastern neighbourhood off Lehmans Road and the northern subdivision roading, and carries them into the Site.

d) Creating a high amenity and diverse residential neighbourhood by providing interfaces to roads, reserves and rural environments.

e) Respecting and building on local identity and character of Rangiora by retaining specific vegetation features from the Site, and anchoring the development into the wider landscape.

21. A development concept can provide for sound urban design by:

a) A hierarchy of movement corridors.

b) Prioritisation of walking and cycling.

c) A north-south alignment of street blocks to maximize solar access and provide for efficient use of lots.

d) Block perimeters being kept as small as practicable to aid permeability and higher public amenity.

e) Enabling a range of housing typologies set in high quality landscape and street setting with generous amenity plantings and curtilage.

Figure 8: St Kilda development images (Bayleys)

22. St Kilda, Cambridge is a premier development on the outskirts of Cambridge, centrally located and with easy access to the Waikato Expressway. It was originally part of a small dairy operation which was dissected by the Waikato Expressway, leaving a portion within the Cambridge Town boundary and the larger balance of the property of approximately 80 ha (which became St Kilda) on the Eastern side of the Expressway, left in the Rural Zone.
23. The initial development concepts were for a Rural Residential type development given the Expressway separation of the existing residential development on the Western side of the Cambridge Bypass, however this was not supported by Council and a new concept of larger residential sections of a 1600m² average size was developed and approved – see https://www.stkilda.nz/page/location/

EFFECTS ON THE ENVIRONMENT

Township growth and urban form

24. The Site immediately adjoins the western edge of urban Rangiora.
25. The WDDS indicated a general preference for the direction of urban growth of Rangiora to the east as a way of balancing up the residential areas around the town centre and some growth to the west.
26. The approach of the WDDS was to signal growth options to be confirmed in the District Plan Review:

The broad directions for greenfield residential growth for the District's main towns are set out in Figures 11 to 14. Further work will be carried out to identify and confirm the exact locations and extent of these residential growth areas, together with the intensification opportunities within existing urban areas. These will be enabled through the District Plan Review and other planning tools.

27. The Strategic Planning documents clearly signal active consideration of growth needs and growth directions. The options available to the Council were constrained by the approach of the CRPS as the District Plan has to give effect to the CRPS and cannot be
inconsistent with it. The CRPS took effect in 2013 and is overdue for review.
28. The CRPS tightly holds urban growth to the constraints of Map A Chapter 6 and the identified FDAs which although amended by Plan Change 1 in 2020 does not respond to the directions of the NPS-UD. In any event the approach is focused on the need for housing in full urban residential land, less on other residential development forms.
29. As such the Site falls outside the planning policy framework for urban growth. However, in terms of urban form and on the ground, there is considerable merit and logic to conversion of this existing LRZ land to a new high amenity residential form that can be integrated into the Rangiora urban fabric.
30. The proposal has the potential to anticipate the longer term growth path confirmed by the decisions on the RRS to protect the future growth option of more intensive urban development in this direction. It can set a pathway to further westward expansion on land
that holds few if any physical barriers to land development.
31. The proposal will contribute to the housing needs of Rangiora and in a form and location that does not undermine the long run urban form of Rangiora. Planned growth confirmed in the PWDP is already intended to extend westwards out to Lehmans Road and to keep the town edge squared up providing depth to future development and providing a rational basis for providing movement networks driven off the key roads such as Rangiora-Oxford Roads. The West Rangiora Future Development Area confirms this approach. The Site sits in the next block west of Lehmans Road so is not proposing a disjointed urban form, nor one that is not part of the long term thinking of urban form and growth for Rangiora.

32. A full residential zoning is proposed under LLRZ D2 and will provide a high quality street character, overall amenity and passive surveillance over the street, and will create the correct lighting standards, roading standard, fully formed footpaths and cycleways required for a high quality urban environment.

Neighbourhood and wider community effects
33. The Site is serviced by a collector road and is close to an arterial road. This provides for ease of access and safe and convenient movement to and from the Site. A planned development co-ordinated by an ODP can facilitate within the site movement corridors and linkages through the Site to provide for walking and cycling.
34. A key positive neighbourhood and community effect will arise from the existing dwellings and their established gardens and plantings that will anchor new development and provide a point of reference for new dwellings. Development will not be on a bare site; it will take place in an existing established part-residential setting. The transition to a low density, high quality premier residential development will start from a favourable position and minimise the apparent extent and nature of the landscape change.
35. The Site is comparatively large (58.4 ha) and has the potential to support a variety of residential building typologies and this will contribute to a mix of households within the development and provide built form variety and interest in the streetscape. Whilst LLR D2 standards are proposed, it may be that part of the Site is suitable for other higher density forms of development, which would be within scope of the alternative relief, and could be considered as part of the master planning process required for preparation of an ODP (ahead of the hearing). The earlier stages of the St Kilda development were for large lot residential, with more clusters of townhouses included as later stages (and a retirement village). A retirement village is unlikely in this case, given the proximity of the Charles Upham Retirement Village.
36. Rangiora is well-positioned to accommodate and service the needs of a fast-growing resident population that will in turn support more business activity, schools, community facilities and community organisations.

Effects on tangata whenua values
37. The Proposed District Plan does not identify any Sites and Areas of Significance to Maori in the Site, but the nearby Rakahuri/Ashely River identified as SASM-025. This has been scheduled as being
River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species
38. The PWDP has Policy SASM-P8 which is relevant to pre-development processes:
Engagement with rūnanga
Te Ngāi Tūāhuriri Rūnanga and the District Council to encourage engagement with the Rūnanga priorto persons undertaking activities and/or applying for resource consent where the activity has thepotential to adversely affect identified sites or areas of Ngāi Tūāhuriri cultural significance. Where priorengagement with Te Ngāi Tūāhuriri Rūnanga h as not been undertaken by an applicant for an activitythat has the potential to adversely affect an identified site, the District Council will consult with the Rūnanga.
39. The Site is not listed as an archaeological site on the NZ Archaeological Site database.

Landscape and visual effects
40. Rural Lifestyle style development exists on the Site now (a series of 4 ha lots with a dwelling and associated accessory buildings on each). The landscape is dominated by shelter belts, utility buildings, significant trees and planted curtilages around

dwellings many of which are well set back off the roads down RoWs.
41. An ODP will help to achieve an integrated, cohesive and coherent development The proposal will lead to a modification of the landscape of the Site from a predominantly lifestyle block landscape to a denser semi-urban environment dominated by residential building that will, in time, get the benefit of street tree and reserve plantings and landscape treatments around the houses.
42. The visual effects which will arise from a change in the number of vegetative and built elements in the landscape are significant, but not avoidable, if the Site is to contribute to the on-going growth of Rangiora. The change will contribute to a high quality amenity and quality of environment and one that will be entirely consistent with and supportive of the rural lifestyle residential development that has successfully established on the Site.

Well-functioning urban environments
43. The Site adjoins the existing built up urban area of Rangiora. Immediately to the east are existing or developing residential areas.
44. The conversion of the Site from present rural lifestyle uses to low density, high quality residential will continue a pattern of outward expansion of Rangiora. Such a change may not be consistent with the PWDP's identification of a Future Development Overlay for west Rangiora only as far west as Lehmans Road, but on the ground it will look and integrate as part of the urban fabric.
45. It will provide some replacement lower density living areas for the existing LLR zones at north west Rangiora – but at much more appropriate higher density that the LLR D1 standard which is 1-2 hh/ha. There are two such areas, shown on the planning maps below. River Road has an 'urban overlay' and is intended to be intensified to urban densities. The land on the opposite (east) side of Lehmans Road is a 'legacy' rural residential zoning which applies under the Operative District Plan. The landowners have developed the adjoining residential subdivision and wish to develop the land for full urban residential development. Services are in place to support this. The constraint to date has been Map A of the CRPS which does not include the land as a Greenfield Priority Area or Future Development Area, GR zoning of this land is consistent with the NPS-UD.

Figure 9: PWDP as notified – LLRZs shown in light grey. Diagonal stripes – urban growth overlay.
Site outlined in red.
46. Rangiora is growing apace. It is attracting significant interest from new home buyers as people respond to the significant investment in upgraded transport links (Northern Corridor and public transport) and a growing economic base for employment within the District and the City.
47. Rangiora has excellent connectivity to the City, both via the new Northern Corridor, and a nascent cycleway link into the City. There is a very regular bus service every half hour.(the No 1 Blue Line) The standard trip takes 70 minutes, and there is a twice daily weekday morning express service from Rangiora, and seven times weekday express out to Rangiora all via Kaiapoi.
48. The Site will step out the western edge of Rangiora, but as it exists in a peri-urban form now, such a change does not alter how the Site interacts with Rangiora as a whole. It is in many ways a functional part of urban Rangiora now; it's only the Zone boundaries and policy framework that create the sense of it not being part of Rangiora.
49. The Site is convenient to the Rakihura/ Ashley recreation trails, the racecourse, Arlington Park, and the airfield. The town centre is easily accessible.
50. The following assessment of the criteria in the NPS-UD for determining a well-functioning urban environment shows that the proposed rezoning will deliver urban, housing and residential outcomes that meet those criteria. There will be a variety of homes enabled by generous lot sizes. The Site is well-positioned, building as it does on an existing township well-serviced by public transport and cycling options, to provide good accessibility to jobs, community services, and open spaces, as well as mitigating climate change impacts and future natural hazards by being not near the coast and well removed from major rivers.

NPS-UD Policy 1

Planning decisions contribute to well functioning urban environments, which are urban environments that, as a minimum:	**Assessment**

(a) have or enable a variety of homes that: (i) meet the needs, in terms of type, price, and location, of different households; and (ii) enable Māori to express their cultural traditions and norms;	The proposal is to have larger lots supporting predominantly standalone dwellings and associated accessory buildings (including generous sized garaging) in an open landscaped garden setting. This will fill a gap in the range of housing typologies available at Rangiora and contribute to a better functioning urban environment overall at Rangiora. It is not necessary for each individual rezoning proposal to have a wide range of housing typologies, and in some circumstances this may not be appropriate. The rezoning will deliver a premier high amenity urban subdivision with generous sized lots which will complement existing and planned higher density residential development at west Rangiora. There is scope with the relief sought for a mix of residential densities. The appropriateness of this can be considered at the master planning/ODP stage. The Site has the potential to create a unique urban environment in Rangiora. It can follow the example of Palmview based on a lake or Kaiapoi Likes providing a niche housing option in Rangiora and the District meeting a need for residential land not constrained to GRZ standards.
(b) N/A business sectors	
(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and	The Site has access to a collector road and a strategic road providing easy access to key community amenities and facilities. The town is served by a public bus route to the city, and a cycle trail connecting to Kaiapoi and the City. The new West Rangiora Development Area adjoins the Site to the south. The Site will become closer to Rangiora public transport routes as they extend out to service this new growth area over time. The Site is in walking distance to Arlington Park and the Rakahuri/Ashley which contains abundant recreations pace. It is easily accessible to the town centre and within walking distance to the Huntingdon Drive local centre.
(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and	The demand for housing and land in Rangiora is largely ahead of the planning means to respond. This proposal will “top up” the land presently set aside in the PWDP and provide a useful buffer to demand. The Site owners have been keen to release this land for more intense development for some time; there is no prospect of land banking.
(e) support reductions in greenhouse gas emissions; and	The Site has significant advantages in being easily accessible to the town centre and reserves, community facilities and schools. The proposal retains a consolidated form to Rangiora with good connectivity and linkages to recreation space and commercial centres reducing the need for car travel.
(f) are resilient to the likely current and	The Site is within the area of influence of a major river but the non-urban flood assessment maps do not show extensive flooding likely at the Site.

future effects of climate change	Being inland it is not at risk from climate change induced extreme natural hazard events like sea level rise. or river flooding.

Effects on ecosystems and habitats

51. The Site is currently used for a mix of low intensity (grazing) farming, and lifestyle purposes. Shelter belts and utility buildings have been established

52. The Site has been identified in the PWDP with two ecological overlays (the PWDP ecological overlay – Plains and Low Plains Ecological District). They are a district-wide overlays and no specific ecological values have been identified in the Proposed Waimakariri District Plan. These overlays seek primarily to retain indigenous vegetation. The PWDP identifies SASM 025 nearby the Site. That is a Site and Area of Significance to Maori and in SASM - Schedule 1 is identified as *being River and tributaries (ngā awa me ngā manga) with Mahinga Kai environs, habitats and taonga species.*

Effects on natural and physical resources

53. The Site drains in a SE direction towards the newly developing residential area.

54. There will be a degree of site disturbance as part of creating the roading network, and reserves, and as part of curtilage development on each lot.

55. The proposed use for residential activity inevitably leads to loss of some rural productive potential as land owner intentions are not about farming or productive use of the land, but lifestyle use and enjoyment. Built forms and hard surfaces become more dominant.

56. The Site comprises 4ha bocks now and these are not able to be used effectively for productive purposes other than for intensive productions based on tunnel housing and other supported production systems. None exist in the Site now.

57. The Site contains Class 2 and Class 3 soils as defined in the NZ Land Use Inventory (Landcare Research) Land Use Capability classes 1-3 **(Figure 10)**. Productive use of these soils other than for low level purposes i.e. grazing, is not feasible given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production).

Figure 10: Site soils: Site outlined in red; (Canterbury Maps)
Class 2 soils: bright green/Class 3 soils: light green;

Discharges of contaminants into the environment

58. There will be no discharges of contaminants into the environment. Wastewater will discharge to the Council's reticulated system.

59. Stormwater discharges will potentially be to ground given ground conditions or to an approved and consented stormwater management and treatment area which will meet all relevant Council standards.

Risks from natural hazards or hazardous installations

60. The PWDP planning maps show the Site as being within a Non-Urban Flood Assessment Area.

61. The District Plan maps do not identify high flood hazard areas or high coastal flood hazard areas, rather these are identified through the flood assessment certification process. This enables the most up-to-date technical information to be used. However, as a guide, areas that are potentially high hazard can be identified through the Waimakariri District Natural Hazards Interactive Viewer (NH - Introduction).

62. Rules that refer to a Flood Assessment Certificate require a certificate to be obtained from the District Council to determine compliance with the relevant rule. The alternative is to apply for resource consent as set out in the rule.

63. Rule NH-R2 states
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;

64. Assessment of flood risk and consequence can be undertaken at subdivision stage.

65. There will be no hazardous installations proposed on the Site.

Geotechnical assessment
66. The PWDP planning maps show the Site as being “Liquefaction damage is unlikely. Standard investigation procedure outlined in NZS3604 is appropriate”.

Contaminated land
67. A Preliminary Site Investigation can be carried out for the Site at subdivision stage.
68. An enquiry of ECAN has identified that two sites at the northern end of the Site potentially contain some contaminated land, which can be investigated further at subdivision stage **(Appendix 6)**. 315 Lehmans Road is an unverified HAIL site (previous use for clay target shooting) and 317 is registered as containing uninvestigated persistent pesticide bulk storage.

Servicing
69. Proposals for servicing the Site and the effects from such servicing in relation to domestic water supply, wastewater, stormwater, roading, and telecommunications will be required for any subdivision consent.

Economic effects
70. It is anticipated that urban development will generate positive economic effects, both from the investigation/development phase and for the longer run economic activity from householders participating in the local economy.

Climate Change effects
71. An assessment of the effects of the proposed rezoning on climate change is included as part of the assessment of a well-functioning urban environment above.
72. A well-functioning urban area that is designed and serviced in an integrated manner, applying sound urban design principles, will enable a reduction in greenhouse gas emissions compared to unplanned, ad hoc development that does not create compact urban forms located where the services and benefits of existing, established urban areas are not readily accessible.
73. There is a triangle of planning influence that can be brought to bear on reducing greenhouse gas emissions
a) Compact urban form minimising distances between homes and work/play options.
b) Proximity of homes to community facilities, services and amenities and business/work areas.
c) Design and provision of movement corridors and linkages that create opportunities other than for vehicles for getting around.
74. The Site of the proposed rezoning:
a) Helps in retaining a compact urban form to Rangiora.
b) Is easily accessible to the town centre and is located convenient to the recreation resources of the nearby Rakahuri/Ashley River, the airfield and racecourse and Arlington Park.
75. Rangiora has excellent connectivity to the City, both via the Northern Motorway, the new Northern Corridor, a cycle way link to Kaiapoi which is linked to the new north city cycle way along the Northern Corridor and a very regular bus service.

Positive effects
76. The proposed rezoning will provide for the continued growth of Rangiora by managing the development through an ODP. The proposal will provide a buffer to on-going high level demand for lots in Rangiora. It will cater for a specific housing need not found in GRZ Zoned land nor LLRZ land. The proposed rezoning is anticipating a form of development that is a much more efficient use of a qualifying site supporting a well-functioning urban area. It is a positive endorsement of Rangiora as a growth node in the District.
77. The benefits derived from a planned ODP approach include facilitating high levels of connectivity, creating community links to identified focal points. The Site is close to recreation facilities. A coordinated and integrated development will provide a distinctive environmental quality and point of difference to the development.
78. The Site adjoins existing and developing residential development on the western edge of Rangiora.
79. From a community well-being perspective, the provision of additional land for residential growth will continue to support the Council’s investment in community infrastructure by maintaining and facilitating growth rates, increasing the rating base and attracting development contributions.

STATUTORY PLANNING ASSESSMENT
80. Submissions must be assessed under the provisions of the RMA, including Part 2 and Section 32 (Requirements for Preparing Evaluation Reports).

National Policy Statements
National Policy Statement on Urban Development Capacity (NPS-UD)

81. The NPS–UD applies to this proposal as it is directed at Tier 1 urban environments, and Tier 1 local authorities which includes Waimakariri District as part of the Christchurch urban environment that is defined in Table 1 of the NPS, and additionally defined as:

any area of land (regardless of size, and irrespective of local authority or statistical boundaries) that: is, or is intended to be, predominantly urban in character; and is, or is intended to be, part of a housing and labour market of at least 10,000 people.

82. The NPS-UD recognises the national significance of:

a) Having well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future; and

b) Providing sufficient development capacity to meet the different needs of people and communities.

83. The NPS outcomes are to be achieved through objectives that address:

a) Planning decisions improving housing affordability by supporting competitive land and development markets.

b) Regional policy statements and district plans enabling more people to live in areas of urban environments near centres or areas with employment opportunities, area well serviced by public transport or a high demand for housing in the area.

c) Urban environments developing and changing over time in response to diverse and changing needs of people, communities and future generations.

d) Local authority decisions on urban development being integrated with infrastructure planning and are strategic over the medium term and long term.

e) Local authority decisions on urban development are responsive particularly for proposals supplying significant development capacity.

f) New Zealand's urban environments support reductions in greenhouse emissions and are resilient to current and future effects of climate change.

84. The key method to achieve these objectives is by development of a Future Development Strategy (FDS). This will set out how the Councils will provide for sufficient development capacity over the next 30 years to meet expected demand. There is no FDS for the greater Christchurch Urban Area that meets the requirements of the NPS-UD.

85. Work on development capacity completed for the NPS - UDC 2016 by the Greater Christchurch Partnership as an Update of the existing Urban Development Strategy (UDS) – Our Space 2019 confirmed what there was a shortage of feasible development capacity for future housing in Waimakariri District for the medium (next 10 years) and long term (10 to 30 years) periods. That assessment is now out of date as it does not address the requirements of the NPS-UD; and rates of take up of land have exceeded projected rates.

86. One of the key changes in the NPS-UD is that local authority decisions on urban development that affects urban environments are responsive, particularly to proposals that would supply significant additional capacity. It also amends the required methodology for housing and business capacity assessments.

87. The current CRPS does not meet the new NPS-UD requirement in relation to proposals for significant additional capacity. Regional councils are required to include criteria in the RPS to determine what plan changes will be treated for the purposes of Policy 8 as adding significantly to development capacity as soon as practicable. ECAN has yet to respond to this requirement.

88. The NPS-UD has immediate effect, so in the meantime, proposals such as this submission must be assessed in the context of the overall intent and purpose of the NPSUD as articulated in the NPS-UD objectives and policies. This includes that NZ has well-functioning environments; provides sufficient development capacity to meet the different needs of people and communities; planning decisions improve housing affordability to contributing to competitive house and land markets; and RMA plans enable more people to live near major employment areas, where there is existing or planned public transport, and where there is high demand for housing.

89. The NPS-UD is the higher order document and its requirements override those of lower order documents where there is a conflict, including regional and district RMA plans.

90. Key objectives and policies in the NPS-UD are assessed here:

NPS-UD Objective/Policy	**Assessment**
Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	The proposed development will further enable Rangiora to sustain itself as a well-functioning urban environment by consolidating the residential area close to the town centre, and provide residential development close to public transport links and existing community and commercial facilities including Huntingdon Drive local centre. The proposal provides choices in the Rangiora housing market and in doing so

Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.	supports housing affordability. Whilst the proposal is for a premier larger lot urban residential development, it is important that all sectors of the market are catered for. This will be more affordable than forcing those wanting large sections out to the much larger and very limited areas of LLR D1 development, or having to purchase 2-3 sections in a standard residential subdivision. There Site is in multiple ownership and the landowners are working together to achieve the rezoning. It will bring more competition into the market by bringing new entrants into the market.
Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply: the area is in or near a centre zone or other area with many employment opportunities the area is well-serviced by existing or planned public transport there is high demand for housing or for business land in the area, relative to other areas within the urban environment.	The CRPS is due for review in 2024 but in the meantime the existing CRPS is not in accordance with the NPS-UD 2020. The proposed rezoning is on the edge of the District's largest centre, which offers a wide range of community and business services, and employment opportunities. It is expected that a proportion of future residents will commute outside the township, but as the township and associated business areas e.g. at Southbrook, continue to grow, this is expected to become proportionally less. Rangiora is well serviced with public transport, there is scope for future mass transit PP, and there is a high demand for housing at Rangiora. The Site adjoins the new West Rangiora Development Area, to the south. Extensions of public transport to service this growth area will be readily accessible to the Site.
Objective 6: Local authority decisions on urban development that affect urban environments are: integrated with infrastructure planning and funding decisions; and strategic over the medium term and long term; and responsive, particularly in relation to proposals that would supply significant development capacity.	Whilst not currently identified as a future growth area in RMA documents, the Site is well placed at the township edge to be serviced by existing infrastructure. Some upgrades may be required, which will be investigated further with Council prior to the hearing. See Policy 8 below for commentary on proposals which supply significant development capacity
Objective 8: New Zealand's urban environments: support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change	The proposal adjoins the existing built up are of Rangiora, close to public transport links. Its excellent accessibility to Christchurch City, substantially enhanced with the new Northern Motorway extensions, means it is now highly accessible to these nearby major employment areas. Travel distances are relatively short, minimising vehicle miles and the potential for greenhouse gas emissions. There is a cycleway link from into Christchurch City, and regular bus services, including an express route. The Site is inland and not subject to natural hazard risks associated with sea level rise arising from climate change.
Policy 1 – Planning decisions for well-functioning urban environments	Assessed at para 41-50
	The proposed rezoning is anticipated to provide sections that will be available for the short term (up to 3 years) and into the medium term (3-10 years) if adopting a more conservative outlook.

Policy 2 - Sufficient development capacity Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.	The locational and amenity advantages of Rangiora also favour strong ongoing demand. The PWDP UFD-O1 Feasible Development Capacity for residential activities identifies the need for 6300 residential units in the period 2018-2028, and 7100 residential units 2028-2048. These numbers are derived from Chapter 6 CRPS Table 6.1. and are out of date. Data from the Council (November 2021) confirms that there are about 800 vacant lots in Rangiora. Building consents are at about 180/year. That means there is about 4 years vacant land supply. A lead in time of 3-5 years is needed to go from rezone to house build so the Council is facing an unnecessary squeeze on land availability. That will translate in to an upward shift in land and section prices as has been the case at Rolleston. The data suggests that the PWDP will be late to the party to ensure there is at least sufficient development capacity to meet expected demand for housing land over the short term, medium term, and long term. There is a looming, inevitable land supply issue so any proposal to add capacity will push the Council closer to meeting the requirements of the NPS-UD. The proposal is consistent with ensuring there is at least sufficient land supply for housing.
Policy 8 – Responsiveness to plan changes Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is: (a) unanticipated by RMA planning documents; or (b) out-of-sequence with planned land release	The proposed rezoning is not anticipated by RMA documents - it is not a Greenfield Priority or Future Development Area in the CRPS, or a New Development area in the PWDP. A responsive approach to the proposal is required as it meets the Policy 8 criteria for unanticipated zoning. It will contribution to well functioning urban environments and will add significant development capacity. There is no development capacity for the housing typology proposed – so any provision is significant in this context. The development will deliver appx 311 high amenity large lot residential sites at an average density of 1500m2. This will be higher if a mix of densities are proposed, which may be appropriate in some parts of the Site, dependent on master planning work to follow.

91. Adopting the submission to re-zone the land, and enable the proposed development on the submission Site will satisfy the objectives and policies of the NPS-UD.

Proposed National Policy Statement for Highly Productive Land (NPS-HPL)

92. The Government proposed in 2019 a NPS-HPL to prevent the loss of productive land and promote its sustainable management. The overall purpose of the proposed NPS-HPL is to improve the way highly-productive land is managed under the Resource Management Act 1991 (RMA) to:

a) Recognise the full range of values and benefits associated with its use for primary production
b) Maintain its availability for primary production for future generations
c) Protect it from inappropriate subdivision, use, and development.

93. The NPS-HPL is still a proposal and not intended to take effect until after Gazettal. At the date of this submission the NPS-HPL has no effect and no assessment of it is required for the purposes of this submission.

94. The Proposed NPS-HPL interim definition of HPL is land defined as Land Use Capability Class 1-3 soils. A portion of the Site contains Class 2 and 3 soils (see **Figure 10)**. Highly productive use of these soils is not realistic given the small size of the individual titles, existing land ownership pattern and urban edge location (with potential for reverse sensitivity effects arising with more intensive production). Its present use as lifestyle blocks, low level grazing and agistment is the more likely long run use of the Site if not rezoned.

95. Objective 3 of the Proposed NPS-HPL specifically refers to highly productive soils being protected by avoiding *"uncoordinated urban expansion on highly productive land that has not been subject to a strategic planning process"*.

The Site was assessed through a strategic planning process (WDDS 2018) and the RRS as a preferred site for LLRZ development, and rejected for a change in zoning on the basis that it may be required for long term urban growth of Rangiora.
96. It is therefore considered that this submission to re-zone the Site is largely in accordance with the Proposed NPS-HPL.

National Planning Standards

97. The National Planning standards prescribe various matters under the RMA so that there is consistency among planning documents most relevantly here in terms of appellations for zones, and the standards applying to these zones.
98. The proposed rezoning adopts the standard zone appellation, in this case LLRZ as contained in the PWDP.
99. The PWDP identifies plan standards for minimum and average net site areas for the respective zones. These are modified for the proposed rezoning as a higher density LLRZ.
100. The higher density LLR zoning is entirely consistent with the NPS purpose for the LLRZ as reproduced below. In this case, the principal constraint to more intensive development is the peri-urban location where a lower density transition to the rural environment is appropriate (particularly noting that the zone boundary is 'mid block' so there is no natural or physical buffer between rural and residential areas); the existing pattern of 4 ha lots with existing substantial homes and gardens; and the fact that the premier large lot subdivision proposed relies on consistency of housing quality and character to be deliver on this vision for the area.

Large lot residential zone

Areas used predominantly for residential activities and buildings such as detached houses on lots larger than those of the Low density residential and General residential zones, and where there are particular landscape characteristics, physical limitations or other constraints to more intensive development.

Low density residential zone

Areas used predominantly for residential activities and buildings consistent with a suburban scale and subdivision pattern, such as one to two storey houses with yards and landscaping, and other compatible activities.[2]

Canterbury Regional Policy Statement 2013 (CRPS)

101. Chapter 6 of the RPS *"provides a resource management framework for the recovery of Greater Christchurch, to enable and support recovery and rebuilding, including restoration and enhancement, for the area through to 2028. Recovery in Greater Christchurch is also supported by the provisions in Chapter 5 notated as 'Entire Region'. The provisions in the remainder of the RPS also apply.3"*
102. An assessment of the proposed rezoning against the relevant CRPS Objectives and Policies is set out in **Appendix 1**. This should be read in the context of the CRPS being overdue for review and that it does not provide a regional response to the NPS-UD. The
need to focus on earthquake recovery has now passed and so many of the directive provisions need to be given appropriate 'weight' in a new national policy environment with a focus on flexible, responsive panning approaches that better provide for people's needs and well-being.
103. That assessment shows that

a) The development proposal achieves the objectives for the location, design and function of new developments (Objective 5.2.1)

b) The traffic effects of the proposal are unlikely to give rise to adverse effects and so achieves CRPS objectives for the strategic land transport network (Policy 5.3.7)

c) The Site falls outside the FDAs shown on Map A of Chapter 6 and in that regard is inconsistent with RPS Policy 6.2.1 clauses 1 to 3.

1. identifies priority areas for urban development within Greater Christchurch;

2. identifies Key Activity Centres which provide a focus for high quality, and, where appropriate, mixed-use development that incorporates the principles of good urban design;

3. avoids urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS

d) The environmental effects assessment outlined above establish that the proposed development is consistent and will not give rise to any concerns with respect to all the matters listed in RPS Policy 6.2.1 clauses 4. to 11. These matters are:

6.2.1 Recovery framework

Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that:

1. As above;

2. As above;

3. As above;

4. protects outstanding natural features and landscapes including those within the Port Hills from inappropriate subdivision, use and development;

5. protects and enhances indigenous biodiversity and public space;
6. maintains or improves the quantity and quality of water in groundwater aquifers and surface waterbodies, and quality of ambient air;
7. maintains the character and amenity of rural areas and settlements;
8. protects people from unacceptable risk from natural hazards and the effects of sea-level rise;
9. integrates strategic and other infrastructure and services with land use development;
10. achieves development that does not adversely affect the efficient operation, use, development, appropriate upgrade, and future planning of strategic infrastructure and freight hubs;
11. optimises use of existing infrastructure; and
12. N/A

e) The proposed rezoning achieves policies relating to:
- Sustainability;
- Integration of transport infrastructure and land use;
- Urban design; and
- Biodiversity, natural hazards, landscape, soils, contaminated land.

104. In terms of the CRPS polices for rural residential developments (Policy 6.3.9) the proposal sits square with all policy matters other than being a location identified in an adopted Rural Residential Strategy; and being at a higher density than provided for under this policy (ie greater than 1-2 hh/ha). As such it has a majority of features entirely consistent with the policy.
105. The CRPS includes housing capacity targets as below

6.2.1a Targets for sufficient, feasible development capacity for housing [inserted in accordance with sections 55(2) and 55(A) of the Resource Management Act 1991, from the National Policy Statement on Urban Development Capacity 2016]
For the period 2018-2048, sufficient, feasible development capacity for housing is enabled in Greater Christchurch in accordance with Table 6.1.
Table 6.1 Targets for housing development capacity in Greater Christchurch, 2018-2048

106. These derive from Our Space, under the requirements of the then NPS-Urban Development Capacity 2016, since replaced by the NPS-UD 2020. The targets (known as bottomlines in the NPS-UD) are to be treated as 'minimums' not 'maximums'.
Policy 6.3.12
enables urban development in the Rangiora and Kaiapoi FDAs (new Development Areas in the PWDP) where needed to meet the medium term targets. This a 'minimum' allocation approach contrary to the NPS-UD. The NPS-UD favours over allocation, including in locations unanticipated by RMA plans, where it will add additional development capacity, can be integrated with infrastructure planning and funding, and will contribute to well functioning urban environments – as is the case the proposed Lehmans LLR D2 zone.
107. The proposed Lehmans LLR D2 zone is consistent with the CRPS except with respect to those parts of the CRPS which are out of step with and do not give effect to the higher order plan, the NPS-UD.

Proposed Waimakariri District Plan
108. An assessment of this proposal against the relevant PWDP Objectives and Policies for urban growth and development as notified on 17 September 2021 is set out in **Appendix 2.**
109. That assessment shows that the proposed rezoning is entirely consistent with the relevant objectives and policies, including as sought to be amended by this submission. Those amendments are to UFD-P3 Identification/location and extension of Large Lot Residential Zone areas; and LLRZ-O1 and LLRZ- P1-5 and reflect the intent and outcomes intended for the proposed LLRZ D2 zone, which is a higher density LLRZ zone than the PWDP LLRZ zone (renamed LLRZ D1 in this submission).

ASSESSMENT AGAINST OTHER PLANNING DOCUMENTS
Our Space 2018-2048 Greater Christchurch Settlement Update (2019)
110. Our Space is a non-statutory document prepared under the Local Government Act. It
"responds to the new Government Policy Statement on Land Transport, which has increased funding for mass public transit schemes, and meets the requirement of the National Policy Statement on Urban Development Capacity (NPS-UDC) 2016 to prepare a
future development strategy…. Specifically, it:
• sets out how targets for housing for the next 30 years will be met, accommodating an additional 150,000 people;
• identifies locations for housing growth, encouraging Central City and suburban centre living while providing for township growth in Rolleston, Rangiora and Kaiapoi;…

• *promotes a compact urban form, which provides for efficient transport and locates development in a manner that takes into account climate change and sea level rise.[4].*

..Underpinning this settlement pattern approach is the vision for a transformation of the transport network that fosters much greater public and active transport usage, and reduced reliance on the private vehicle.

111. Our Space acknowledges that this will require commitment from the Government to invest in the necessary improvements to our transport system, which could include investing in rapid transit services. To date, there has been no successful business case for improved public transportation, including not as a Covid 19 fast track infrastructure project.

112. The Our Space housing capacity targets (Table 3) and Future Development Areas are related to growth of urban areas.

113. Our Space, like the CRPS (and the Operative District Plan) are now out of date, as they do not reflect or give effect to the new requirements of the NPS-UD.

Waimakariri 2048 District Development Strategy (WDDS)

114. The preferred growth directions for Rangiora in the WDDS 2048 (2018) are outlined above (under 'Site') i.e. westwards to Lehmans Road, and otherwise eastwards. However, the Council in its decision on the RRS, recognized west of Lehmmans Road as a potential longer town urban growth area.

115. The WDDS Rangiora Snapshot (pp38-39) -when looking ahead to 2048 proposed that:

a) Rangiora remains the District's largest town
b) 30,000 – estimated population (2048)
c) 12,025 – estimated households
d) 5,025 - new households in Rangiora
e) Continues to accommodate one third of the District's residential growth
f) 167 – estimated annual building consents for new dwellings for the next 30 years
g) 423 hectares of additional feasible residential land required by 2048 (this includes capacity in remaining stages of existing residential developments as well as new greenfield areas inside and outside of the Infrastructure Boundary)
h) Future residential growth directions proposed to the east (predominantly) and west of the current town
i) Opportunities for intensification/regeneration to be identified
j) New growth directions take into account areas of unacceptable natural hazard risk and areas of significant environmental and cultural values
k) New growth areas to connect into existing sewer and water networks
l) Stormwater Levels of Service designed to meet increased performance requirements

116. At the 2018 Census Rangiora had a population of 17,841, and 7314 total dwellings (incl those unoccupied and under construction). Population projections for the District show an average annual change 2018-2020 of 1700 persons. If Rangiora continues to attract a third of all district growth as stated in the WDSS then Rangiora's population in 2021 will be around 18,900.

Mahaanui Iwi Management Plan

117. Part 1 of the PWDP in a section "Mana Whenua" sets out the position with respect to iwi and the review of the district Plan:

a) The District's territorial area sits within the takiwā (territory) of Ngāi Tūāhuriri which is one of eighteen Ngāi Tahu regional papatipu rūnanga, constituted under the ***Te Rūnanga o Ngāi Tahu Act 1996*** *to represent* ***mana whenua*** *interests.*

b) The preparation and change of a district plan must take into account relevant iwi documents. For the District, Ngāi Tahu has set out its resource management values, issues, objectives and policies within the Mahaanui Iwi Management Plan (2013).

c) The Mahaanui Iwi Management Plan identifies objectives, issues and policies for natural resource and environmental management for six pāpatipu rūnanga (including Te Ngāi Tūāhuriri Rūnanga). It seeks to ensure that the taonga and resources of Ngāi

Tahu mana whenua are recognised and protected in the decision-making of statutory agencies. The Mahaanui Iwi Management Plan contains a comprehensive suite of policies and objectives addressing the range of resource management matters of significance to tangata whenua. The District Council shall have regard to the Mahaanui Iwi Management Plan when preparing or changing the District Plan, to the extent its content has a bearing on resource management issues of the District.

118. The Mahaanui Iwi Management Plan (MIMP) 2013 was released on 1 March 2013.

119. The MIMP is a tool for tangata whenua to express their identity as manawhenua and their objectives as kaitiaki, to protect their taonga and resources, and their relationships with these. The MIMP seeks to ensure that these taonga and resources are recognised and protected in the decision-making of agencies with statutory responsibilities to tangata whenua. Importantly it is also a tool

that assists Papatipu Rūnanga representatives to articulate their values, issues and policy into statutory processes.
120. The MIMP includes both general objectives and policies about the management of land, air, and water, and also includes catchment specific objectives and policies.
121. Section 5.3 Wai Maori (pp77-98) contains an extensive discussion about tangata whenua rights and interests in freshwater. It provides a suite of Issues, Objectives and Policies for freshwater
122. Section 5.4 Papatuanuku (pp101-124) sets out the Ngai Tahu Subdivision and Development Guidelines that are to be read along-side objectives relating to:

a) Land use planning and management in the takiwā reflects the principle of Ki Uta Ki Tai. (from the mountains to the sea)

b) Rural and urban land use occurs in a manner that is consistent with land capability, the assimilative capacity of catchments and the limits and availability of water resources.

c) Inappropriate land use practices that have a significant and unacceptable effect on water quality and quantity are discontinued.

d) Ngāi Tahu has a prominent and influential role in urban planning and development.

e) Subdivision and development activities implement low impact, innovative and sustainable solutions to water, stormwater, waste and energy issues.

123. Section 5.5 Tane (pp127-137) includes objectives that focus on:
a) Regional policy, planning and decision making in the takiwā reflects the particular interest of Ngāi Tahu in indigenous biodiversity protection, and the importance of mahinga kai to Ngāi Tahu culture and traditions.
b) The customary right of Ngāi Tahu to engage in mahinga kai activity is recognised, protected and enhanced…
c) Customary use, and therefore mahinga kai, is given effect to as a first order priority for freshwater management in the takiwā.
124. Section 6.4 (pp213-224) addresses issues of particular significance to the lands and waters of the Waimakariri catchment within which the Site lies.
125. Relevant Objectives relating to urban development of land in that catchment include:

a) The natural "energy, vitality and life" of the Waimakariri River as a braided river is protected and restored.

b) The discharge of contaminants to the Waimakariri and its tributaries is eliminated.

c) Water quality and flows in the Waimakariri and its tributaries are improved to enable whānau and the wider community to have places they can go to swim and fish.

d) The mauri and mahinga kai values of the Waimakariri and its tributaries and associated springs, wetlands and lagoons are protected and restored; mō tātou, ā, mō kā uri ā muri ake nei.

126. A key issue relating to subdivision and development is that subdivision and development activities in the lower catchment have the potential to adversely affect Ngāi Tahu values such as waterways, mahinga kai and sites of significance (Issue Wai4).
127. The proposal provides for full urban reticulation of the three waters and is consistent with the objectives and policies contained in Chapters 5.3 and 5.4 of the MIMP. The proposal does not preclude individual land owners from installing rainwater collection and use from roof areas at the time of building development.
128. The proposal has been designed taking into consideration the potential effect of resultant subdivision and development on the rivers and streams that flow into the lowland rivers.
129. Overall it is considered that the proposal will not have adverse impact on the cultural values of iwi as set out within the MIMP.

SECTION 32 ASSESSMENT

130. A Section 32 assessment is contained in **Appendix 3.**
131. In summary, the PWDP zoning and associated rules (RLZ Zone with a minimum lot size for subdivision and a dwelling 4ha) do not meet the needs and aspirations of the current owners.
132. Strategic Council planning documents (specifically the WDDS) have a focus on only meeting urban growth demands within urban environments of existing towns. They favour intensification (15hh/ha) and a strict allocation of capacity by development areas. It is a control and command regime consistent with Map A of Chapter 6 of the CRPS but is out of step with the requirements of the NPS-UD which requires a more flexible, responsive approach, prohibits a hard fixed unmoveable urban/rural boundary.
133. This approach leaves little room for new proposals or proposals that do not sit square with the standard array of GRZ/medium density or SETZ (Settlement Zone). SETZ applies to some of the District's smaller settlements outside Greater Christchurch.
134. Neither LRZ nor Large Lot Residential (LLRZ) as notified in the PWDP is an efficient use of this block of land located as it is immediately adjoining the urban area of Rangiora, and in a location easily accessible to the town centre by active transport modes as well as car and several district reserves.
135. If this Site is not zoned for LLRZ D2 (minimum average lot size 1500m^2) use to enable residential re-development then it will drive pressure to re-zone elsewhere. That step potentially will not have the significant benefits to Rangiora long term in relation to enabling a well-functioning urban environment that enables people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future. Additionally re-zoning to LLRZ D2 will contribute to providing additional development capacity to meet the different needs of people and communities in a planned manner and

consistent with the NPS-UD.
136. The Site can readily be developed to reflect the principles of the Urban Design Protocol with values of character, context, and connectivity.
137. The Section 32 assessment concludes that the proposal to re-zone the Site from LRZ zone to LLRZ D2 Zone (average lot size 1500m$_2$) is the most appropriate method for achieving the objectives of the proposal, than the other alternatives considered.
138. Option 2 identified in the s 32 assessment is consistent with some PWDP policies notwithstanding that it does sit square with the strategic intentions signaled in the WDDS and the PWDP approach to providing for development capacity and urban development.
139. Option 2 identified in the s 32 assessment to re-zone the Site is the most appropriate given:

a) The proposals adopt the PWDP zones, development and activity standards with appropriate amendments. This ensures continuity of the District Plan anticipated environmental outcomes and urban amenity for Rangiora and adjoining residential areas;

b) Will be consistent with and give effect to many of the relevant PWDP objectives and policies;

c) It is a logical extension to the developed and developing residential land adjoining the Site while achieving a compact, efficient urban form that removes pressure on isolated rural land elsewhere around Rangiora.

d) It gives effect to the NPS-UD, specifically Objective 6 c) and Policy 8, delivering significant additional development capacity and contributing to a well functioning urban environment.

e) It is assumed that there will be capacity in the public utilities and the existing road network, including planned upgrades, to accommodate the traffic effects of the redevelopment;

f) The proposed Site specific ODP will provide certainty of the final form and disposition of the re-zoned area including its proposals for reserves, roading, future linkages for pedestrian and vehicular traffic.

140. The re-zoning proposal is considered to be appropriate to achieve the sustainable growth and development of Rangiora.
141. The economic, social and environmental benefits of the proposed rezoning outweigh any potential costs.
142. The overall efficiency and effectiveness of the proposed rezoning (Option 2) is high, in comparison to the alternative options set out in the s 32 Assessment which are low (Options One and Four) or low to moderate (Option Three).
143. The PWDP proposes to release land for development in the new Development Areas at Rangiora and Kaiaipoi through a novel and untested certification process that is not clearly derived from RMA statutory powers, nor Local Government Act 2002 (LGA) authority. This approach is not proposed for the LLR Overlay areas. As the proposed Lehmans Road LLR D2 zone proposed by this submission seeks large lot urban densities, it is anticipated that Council may favour the certification process if it accepts the proposed rezoning. This is opposed – rezoning to LLRZ D2 is sought.
144. Potential difficulties with the proposed certification process are identified and discussed in the Section 32 Assessment. (**Appendix 3)**. In summary, the process is hugely discretionary, does not provide conventional rights to an applicant (eg right of objection/appeal) meaning decisions cannot be challenged, and it is not apparent that the process will be appropriately documented with a transparent record of the decision-making within the certification process. Further uncertainty arises in the practicalities of how to negotiate and manage the staging, funding and building of key infrastructure across a range of Sites, and a risk that land supply is controlled by a limited number of large developers. It is a far less efficient and effective method for delivering land for housing than the Council rezoning the land in the PWDP.
145. The proposed rezoning is considered to be the most appropriate, efficient and effective means of achieving the purpose of the RMA.

CONSULTATION

146. The landowners and their consultants have submitted on the WRRS and the WDDS (**Appendix 4)**.
147. The submissions to re-zone as rural residential or identify the Site as suitable for LLRZ have been rejected as noted above. LLRZ but at higher densities as now proposed is considered to be a more efficient use of the land and better meets market demand. 5000m^2 sites provide more land is needed for a spacious home and garden.
148. The landowners have been consistent in their wish to find a zone and possible land uses better suited to their needs.

CONCLUSION

173 The submission seeks to rezone 58 ha of land adjoining Rangiora from Lifestyle Rural Zone (LRZ) to Large Lot Residential with a specific density standard (LLRZ D1), minimum average lot size 1500m^2.
149. The Site has a long history of rural lifestyle use. It is not significantly restricted by potential natural hazards especially flooding, nor does it have physical limitations for development for residential purposes as it is not liquefaction prone, and has no known geotechnical limitations but does contain an area of LUC 2 soils. It is near a site of significance to iwi (SASM – 025) being the Rakahuri/Ashley River The Site has access to a collector road and is near to a strategic road giving direct access to the town centre and a range of community amenities and facilities.
150. The Site immediately adjoins the urban area of Rangiora, and is well located to join in to Council utility services. It is well suited for conversion to residential use.
151. The Site is not identified within the westward growth direction for Rangiora in the District Development Strategy 2018 nor is

it part of the DEV-WR development area which adopts Lehmans Road as its western boundary. It is in a location that achieves coherent and compact urban form offering ease of access to business services, community facilities, reserves and the primary road network.
152. The proposed rezoning provides for a connected and high amenity residential living environment not presently available under the PWDP while avoiding and/or mitigating any potential adverse effects on the environment. It will provide for continuing high demand for a variety of high quality residential sections aimed at a particular segment of the housing market in an ideal location, easily accessible to the existing town centre services and facilities. It will broaden the range of housing available. As such, it is consistent with the NPS-UD including Objective 6c) and Policy 8, to be responsive to proposals which supply significant development capacity and contribute to a well functioning urban environment.
153. The use of this Site for residential purposes can be a sustainable and efficient use of land and infrastructure. The proposed rezoning better provides for the social, economic, environmental well-being of the landowners and the Rangiora community than continuation of the current low intensity lifestyle land use on 4ha blocks, or a conventional LLRZ residential use.
154. Any potential adverse effects of the implementation of the proposed rezoning can be assessed at subdivision stage but there has been no restriction on servicing the blocks to date. Capacity will need to be confirmed for infrastructure, power and road network. Any future subdivision of the Site will need to confirm water supply and wastewater treatment and disposal options.
155. Rezoning of the site to LLRZ zone is not inconsistent with the policies and objectives of the PWDP, but it is at odds with the dated CRPS approach to provision of urban growth and housing capacity for Greater Christchurch, to the extent that it is not within an FDA created by Change 1 to the CRPS and is not identified as an LLRZ site under the strategic RRS prepared by the Council.
156. As the proposal helps achieve the purpose of the RMA, and has been shown to be consistent with the relevant provisions of the NPS-UD, the submission can be accepted by Waimakariri District Council.

Further Submission Point 4.

Reason

See Attachment

I seek that the submission be:
Allowed