BEFORE THE ENVIRONMENT COURT
CHRISTCHURCH REGISTRY

I TE KŌTI TAIAO O AOTEAROA
KI ŌTAUTAHI

	ENV-2025-CHC-
IN THE MATTER	the Resource Management Act 1991
AND	an appeal under clause 14(1) of the First Schedule of the Act
BETWEEN	**RICK ALLAWAY AND LIONEL LARSEN**
	Appellants
	WAIMAKARIRI DISTRICT COUNCIL
	Respondent

NOTICE OF APPEAL TO ENVIRONMENT COURT AGAINST DECISION ON PROPOSED PLAN

Dated: 21 August 2025

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TO: The Registrar
Environment Court
Christchurch

1. We, **RICK ALLAWAY AND LIONEL LARSEN**, (the **Appellants**) appeal against a decision (or part of a decision) of the **WAIMAKARIRI DISTRICT COUNCIL** (the **Respondent**) which rejected our submission (the **Submission**) to the Waimakariri District Plan (the **Proposed Plan** or **PDP**).

2. We made a submission on the Proposed Plan.

3. We are not a trade competitor for the purposes of section 308D of the Resource Management Act 1991 (the **Act**).

4. We are directly affected by an effect of the subject of the appeal that adversely affects the environment.

5. We received notice of the decision on or about 19 June 2025.

6. The decision was made by the Waimakariri District Council.

7. The decision (*or* part of the decision) that we are appealing against is: The part of the Council's decision which rejects our submission seeking:

<u>Preferred Relief:</u>

7.1. Amend the Proposed Waimakariri District Plan (PWDP) Planning Maps by rezoning the following land from Rural Lifestyle Zone **(RLZ)** to Large Lot Residential – Specific Control Area Density 2 (**LLRZ SCA D2**), with a minimum net site area 1000m^2 and minimum average net site area 1500m^2 (or similar);

Registered Owner	**Address**	**Appellation Title**	**Area (ha)**
Dale & Jackie May	315 Lehmans Road	Lot 5 DP 83612	4.0000
Mike & Sharon Brown	311 Lehmans Road	Lot 6 DP 83612	4.0450
Paul and Denise Ward	305 Lehmans Road	Lot 7 DP 83612	4.7700
Rick and Lisa Allaway	285 Lehmans Road	Lot 8 DP 83612	4.3320
DA & JM Stewart	271 Lehmans Road	Lot 8 DP 328154	4.0008
WE Radford	267 Lehmans Road	Lot 7 DP 328154	4.0002
Jethro Larsen	265 Lehmans Road	Lot 6 DP 328154	4.0690

G & J Billington	263 Lehmans Road	Lot 5 DP 328154	4.0560
Ian Sunckell	261 Lehmans Road	Lot 4 DP 328154	4.3347
ME Vermeulen	259 Lehmans Road	Lot 3 DP 328154	4.4732
RL Mauger	257 Lehmans Road	Lot 2 DP 328154	4.1638
Kenny Moore	255 Lehmans Road	DP 328154	4.1295
Lionel Larsen	201 Lehmans Road	Lot 1 DP 83770	4.004
Jeanette Adriana Allison and Richard William Allison (Rangiora Vet Centre)	181 Lehmans Road	Lot 2 DP 83770	4.057
			58.4352 ha

7.2. Amend the PWDP Planning Maps by rezoning the properties listed above to Large Lot Residential – Specific Control Area Density 2 (**LLR-SCA D2**); or

7.3. Change the notified proposed Large Lot Residential Zone to Large Lot Residential – Specific Control Area Density 1 (**LLR – SCA D1**), with minimum net site area 1500m^2 and minimum average net site area 1000m^2, and amend the PWDP Planning Maps to reflect this;

7.4. Include provision for some potential higher density residential development within the Site, potential location and suitability to be addressed as part of master planning and the development of an Outline Development Plan for the Site;

7.5. Amend the PWDP provisions as set out below: (additions in bold and underlined, and deletions as strike out):

UFD-P2

Identification/location of new Residential Development Areas ***and identification/location and extension of existing Residential Zones except the Large Lot Residential Zone***

In relation to the identification/location of residential development areas:

1. *residential development in the new Residential Development Areas at Kaiapoi, North East Rangiora, South East Rangiora and West Rangiora is located to implement the urban form identified in the Future Development Strategy ;*

2. *for new Residential Development Areas and* ***other residential zones****, other than those identified by (1) above,* ~~*avoid*~~ *residential development* ***shall generally*** ~~*unless located so that they:*~~

a. occur in a form that concentrates, or are attached to, an existing urban environment and promotes a coordinated pattern of development;

b occur in a manner that makes use of existing and planned transport and three waters infrastructure, or where such infrastructure is not available, upgrades, funds and builds infrastructure as required;

c. have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including an ability to be serviced, over time, by ~~way of~~ public or active transport

*d. **~~concentrate~~** **encourage** higher density residential housing in locations **with good accessibility to** ~~focusing on~~ activity nodes such as key activity **and local** centres, schools, public transport routes and open space;*

e. take into account the need to provide for intensification of residential development while maintaining appropriate levels of amenity values on surrounding sites and streetscapes;

f. are informed through the development of an ODP;

g. supports reductions in greenhouse gas emissions; and

h. are resilient to natural hazards and the likely current and future effects of climate change as identified in SD-O6.

UFD-P3

2. new Large Lot Residential development, other than addressed by (1) above, is located so that it:

*a) occurs in a form that is attached to an existing Large Lot Residential Zone, or Small Settlement Zone **or is in a township edge location** and promotes a coordinated pattern of development;*

b) is not located within an identified Development Area of the District's main towns of Rangiora, Kaiapoi and Woodend identified in the Future Development Strategy;

*c) **except in the case of the LLR-SCA D2 Zone** is not on the direct edges of the District's main towns of Rangiora, Kaiapoi and Woodend, nor on the direct edges of these towns' identified new development areas as identified in the Future Development Strategy;*

SUB-O1

Subdivision design

Subdivision design achieves an integrated pattern of land use, development, and urban form, that:

1. *provides for anticipated land use and density that achieve the identified future character, form or function of zones;*

2. *~~consolidates urban development and maintains rural character except where required for, and identified by, the District Council for urban development;~~*

3. *supports protection of cultural and heritage values, conservation values; and*

4. *supports community resilience to climate change and risk from natural hazards.*

SUB-P6

c. for new Residential Development Areas demonstrate how each ODP area will achieve a minimum net density of at least 15 lots or households per ha, unless there are demonstrated constraints then ~~no less than 12 households per ha~~ ***a reduced density standard or density exemption shall apply****;*

SUB-P7

Requirements of Outline Development Plans

~~Ensure that subdivision is in accordance with the fixed or flexible elements of any relevant ODP.~~ ***Manage subdivision to ensure that the outcomes intended by the Outline Development Plan are met.***

SUB-S3

Residential subdivision of any area subject to an ODP, except in the Large Lot Residential Zone shall provide for a minimum net density of 15 households per ha, ***or the minimum density specified in the applicable Outline Development Plan, whichever is the lesser, or if*** *there are demonstrated constraints then* ***a density exemption shall apply.*** *~~no less than 12 households per ha.~~*

Activity status when compliance not achieved: NC

SUB-S3 Residential Yield

Residential subdivision of any area subject to an ODP, except in the Large Lot Residential Zone, shall provide for a minimum net density of 15 households per ha, unless there are demonstrated constraints then ~~no less than 12 households per ha~~ ***a density exemption shall apply.***

General Objectives and Policies for all Residential Zones

The key difference between the General Residential Zone and Medium Density Residential Zone is housing density, with the latter located within walkable distance to town centres, schools, open space and transport routes. The Settlement Zone differs from both of these zones, providing for a greater range of commercial activity, as the settlements do not have their own business zones. The Large Lot Residential Zone provides for ~~very~~ low density ***residential and*** *rural residential living opportunities with a* ***more*** *open, spacious character* ***than other residential zones.***

RESZ-O5

Housing choice

A wide range of housing types, sizes and densities are available in each township to meet housing needs. *~~the needs of the community through~~*

~~1. a range of residential unit types; and~~
~~2. a variety of residential unit densities~~

RESZ-P14

1. *in new Development Areas, achieve a minimum net density of 15 households per ha averaged across the whole of the residential Development Area within the relevant ODP, unless there are demonstrated constraints* ***then a density exemption shall apply. Constraints may include but not be limited to landscape and ground conditions, and existing subdivision and housing patterns.*** *~~less than 12 households per ha.~~*

2. *in new Large Lot Residential Zones ~~Overlays~~, achieve ~~a~~* ***average*** *net den~~sity~~****ies of***

LLR-SCA Density 1 - *1 to 2 households per ha*

LLR-SCA Density 2 - 1500m²

LLRZ - Large Lot Residential Zone

The purpose of the Large Lot Residential Zone is to provide residential living opportunities for predominantly detached residential units on lots larger than other Residential Zones. The Large Lot Residential Zone are located near but outside the established townships, ***other than the LLR-SCA Density 2 Zone located at the township edge****. Some opportunity is also provided for rural activities where the effects of these activities will not detract from the purpose, character and amenity values of the residential zone.*

There are particular landscape characteristics, physical limitations or other constraints to more intensive development. Any opportunity for intensification is reliant on sites being appropriately serviced, ***and*** *natural*

hazard risk being managed. ~~and the density requirements for rural residential development directed by the RPS being achieved.~~

LLRZ-O1

"...

1. *is of low density detached residential units set on generous**ly sized** sites;*

2. ***is an environment with generally lower levels of noise and traffic than other residential zones, and low levels of odour and dust;***

3 ***LLR - SCA D1*** *- has a predominance of open space over built form;*

4. *~~is an environment with generally lower levels of noise, traffic than other residential zones, and low levels of , outdoor lighting, odour and dust; and~~*

5. ***LLR - SCA D1*** *- provides opportunities for agriculture activities where these do not detract from maintaining a quality residential environment, but provides limited opportunities for other activities.*

6. ***LLR - SCA D2 - enables high amenity residential areas providing scope for large houses on large residential sites;..."***

LLRZ-P1(2)

*"2. managing the scale and location of buildings so as to maintain a sense of openness and space between buildings on adjoining sites and ensuring that **in the case of the LLR-SCA D1 zone** open space predominates over built form on each site."*

LLRZ-P4(2)

"...

2. ***LLR-SCA D1*** *- limiting kerb, channel and street lighting compared to other Residential Zones."*

LLRZ-BFS1

"LLRZ-BFS1 Site density

Site density shall be a maximum of:

- One residential unit per 1500m² of net site area, or

- One residential unit on any site less than 1500m² Minimum net site area - 1000m² ..."

LLRZ-BFS4

*"LLRZ-BFS4 Impermeable surface - **does not apply to Large Lot Residential - Specific Control Area Density 2 (LLR-SCA D2)** The maximum impermeable surface of any site shall be 20% of the net site area. Activity status when compliance not achieved: DIS".*

7.6. Any consequential, further or alternative amendments to the PSDP to be consistent with and give effect to the intent of the Submission and the interests of the Appellants, including any changes necessary to give effect to the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act and the NPS-UD.

Alternative Relief:

7.7. Amend Proposed Waimakariri District Plan (PWDP) Planning Maps by rezoning the land identified above from Rural Lifestyle Zone to Low Density Residential Zone; or General Residential Zone; or Large Lot Residential Zone (with density standards as per notified PWDP); or a mix of any of those zones and Large Lot Residential **–** Specific Control Area Density 2 (**LLRZ**), with a minimum net site area 1000m^2 and minimum average net site area 1500m^2 (or similar), or Large Lot Residential Zone Density 1 (**LLR – SCA D1**) with minimum and minimum average lot sizes of 2500m^2 and 5000m^2 respectively, Low Density Residential with minimum and minimum average lot sizes 1000m^2 and 1500m^2 respectively, or General Residential Zone;

7.8. Include provision for some potential higher density residential development within the Site, potential location and suitability to be addressed as part of master planning and the development of an Outline Development Plan for the Site;

7.9. If Low Density Residential Zone is granted, include appropriate applicable amendments listed above under Preferred Relief, and specific provisions (including objectives and policies) for the Low Density Residential Zone, including:

LRZ-O1

LRZ- Objectives

LRZ – O1 The Low Density Residential Zone provides for residential activity and is characterised by low density and spacious housing typologies consistent with a suburban character.

LRZ-P1

LRZ- Policies

LRZ – P1 Enable activities that support and maintain a suburban character by managing the number of residential units that can be accommodated on each site and requiring:

1. a generally low rise built form consisting of single and two storey detached residential units; and

2. appropriate levels of openness around residential units which provides for residents' on-site amenity

7.10. Any consequential, further or alternative amendments to the PWDP to be consistent with and give effect to the intent of the submission and the interests of the Appellant, by way of granting either the preferred relief or the alternative relief, including any changes necessary to give effect to the requirements of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act and the NPS-UD.

8. The reasons for the appeal are as follows:

The Site and The Proposal

8.1. The Site is a 58.4 hectare block of land ('the Site') accessed from Lehmans Road, Rangiora **(Figure 1).** It is owned by the two Appellants and 12 other landowners. The site is zoned Rural in the Operative Waimakariri District Plan, and is zoned Rural Lifestyle Zone (**RLZ**) in the Proposed and Partially Operative District Plans. Both those zones have minimum subdivision criteria of 4 hectares.

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

8.2. To the north, east and south, the Site is surrounded by RLZ zoned 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 east and south east is zoned Medium Density Residential (**MDRZ**) and is part of urban Rangiora with newly developing residential land. About 1.9 km to the NW is Rangiora Airfield and environs, zoned Special Purpose – Rangiora Airfield (SP-RA) which includes provision for a range of activities including residential units and

visitors' accommodation. About 1km north of the most northern lot is the Ashley River.

8.3. The southern-most lot in the Site includes the Rangiora Vet Clinic. It 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, which is zoned **LLRZ**, is about 2.5km west from the junction of Lehmans and Rangiora-Oxford Roads.

8.4. The submission seeks rezoning to enable approximately 311 LLRZ D2 lots within a high amenity, large lot residential zone consisting of large houses of consistent character on large sites (average 1500m^2, minimum 1000m^2).

8.5. The LLRZ D2 standards sought would enable a lower density residential zone to be developed in the medium term (e.g. 10 years) to achieve a high quality subdivision of consistent character. It would be an integrated, staged development subject to an Outline Development Plan (**ODP**):

(a) 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; and

(b) creating a high amenity and diverse residential neighbourhood by providing interfaces to roads, reserves and rural environments; and

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

8.6. The Site is served 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 will

facilitate movement corridors within the site and linkages through the Site to provide for walking and cycling.

8.7. The rezoning as sought would provide for sound urban design including:

(a) a hierarchy of movement corridors; and

(b) prioritisation of walking and cycling; and

(c) a north-south alignment of street blocks to maximize solar access and provide for efficient use of lots; and

(d) block perimeters kept as small as practicable to aid permeability and higher public amenity; and

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

8.8. 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.

8.9. 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.

8.10. Rural Lifestyle style development exists on the Site now, being a cluster of 4 ha lots with a dwelling and associated accessory buildings on each. The existing 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 rights-of-way.

8.11. An Outline Development Plan (**ODP**) will achieve an integrated, cohesive and coherent development. Although there will be a necessary modification of the landscape of the Site from a predominantly Rural Lifestyle block landscape to a denser semi-urban environment dominated by residential building, the area will, in time, get the benefit of street tree and reserve plantings and landscape treatments around the houses.

8.12. Significant positive effects will arise from the proposed rezoning. It will enable the short term housing demand at Rangiora to be met, and will 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.

8.13. There will be 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.

8.14. The existing dwellings and their established gardens and plantings 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.

8.15. The Site, given its size of 58.4 ha, has the potential to support a variety of residential building typologies, which 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 the scope of the alternative relief, and could be considered as part of the master planning process required for preparation of an ODP.

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

8.16. The NPS-UD applies to this rezoning as Rangiora is part of the Christchurch Tier 1 urban environment, and Waimakariri District Council is a Tier 1 local authority.

8.17. Rezoning the Site as sought is required in order to give effect to the NPS-UD, including the following policies and objectives: Objectives 1, 2, 3, 6 and 8, and Policies 1, 2 and 8.

8.18. In particular, the rezoning would contribute to a well-functioning urban environment, and would assist in providing sufficient development capacity to meet expected demand for housing in both existing and new urban areas, and for both standalone dwellings and attached dwellings.

8.19. The rezoning would enable a variety of homes that meet the needs, in terms of type, price, and location, of different households. It would supply the option of larger homes positioned on generously sized lots, providing heightened amenity and privacy.

8.20. The Site is well-positioned, building 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 relatively distant from the coast and well removed from major rivers.

8.21. Rezoning the Site as sought would:

(a) improve housing affordability by supporting competitive land and development markets;

(b) enable more people to live in areas of urban environments near centres or areas with employment opportunities, well-serviced by public transport, where there is a high demand for housing in the area;

(c) be consistent with urban environments developing and changing over time in response to diverse and changing needs of people, communities and future generations;

(d) create urban development integrated with infrastructure planning and strategic over the medium term and long term;

(e) be responsive to a proposal supplying significant development capacity;

(f) support reductions in greenhouse emissions and contribute to a community which will be resilient to current and future effects of climate change.

8.22. Either the preferred relief or the alternative relief sought is necessary and appropriate to achieve sustainable growth and development of Rangiora and the District and meet the requirements of the NPS-UD

8.23. The Site is a logical and preferred location that lends itself to a specific type of housing development which is not provided within the PWDP as a residential option adjoining but outside of the existing urban areas. Nowhere in the District is it possible for land development to take place in a comprehensive, coordinated way which provides a low density, high quality residential environment in the District's towns, the Rural Lifestyle Zone or the Settlement Zone as a permitted activity.

8.24. The density requirements of the GRZ/MDRZ zones (the majority of land in urban areas) drives development to relatively small urban lots best produced as a package across a significant land holding. The GRZ/MDRZ subdivision standards do not provide for the needs of people who seek a generously sized urban lot residential setting. This is a "variety of home that meets the needs, in terms of type, price, and location of [some] households", in terms of Policy 1(a)(i) of the NPS-UD, and is 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 in the PWDP LLRZ.

8.25. The PWDP subdivision standards for LLRZ require lots that are unnecessarily and inappropriately large for people 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/MDRZ subdivision standards do not provide for the needs of people who seek a residential setting with larger lots.

8.26. The focus in the PWDP on prescribing a limited range of residential options and tightly controlling and constraining housing choice within those options is contrary to the NPS-UD, as is tightly constraining and controlling further urban growth within DEV areas around Rangiora and Kaiapoi for a very specific form of residential development driven by density requirements that do not match the needs of all landowners.

National Planning Standards (**NPS**)

8.27. The National Planning standards provide for large lot urban residential living, a residential living option which has not been taken up in the PWDP, apparently due to the restrictive provisions of the CRPS, prescribing only one form of lower density residential living, at a density of 1-2 hh/ha.

8.28. This planning approach does not give effect to either the NPS-UD or the NPS. It does not provide a flexible, responsive approach to innovative development options which meet market demand.

8.29. The planning approach in the PWDP appears to be striving to both require intensification in urban areas, while at the same time moving away from a land allocation model of planning. In doing so, it has created a package of measures that are a major barrier in terms of 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 runs counter to the requirements of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act, and the NPS-UD, to free up land for housing and business development, to encourage innovation in housing, and to make available a range of responses to meet the housing needs of people and communities.

8.30. While the weight of demand (and the planning response) is around affordable housing, consisting of 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, generously sized houses set on generously sized parcels of land within high amenity settings is an important and no less relevant housing sector. There is a strong unmet demand for this type of housing, including for larger family homes with room for a swimming pool, tennis court or similar. Purchasers want to be close to the amenities of Rangiora and within walking and cycling distance of local schools. They do not want the only available options, which are a 4 hectare lifestyle block or a 5000m^2 rural residential site at Mandeville, Ohoka or Fernside.

8.31. There is still strong demand for the "quarter acre (1011m^2) section", which provides many benefits to people and communities, and should not be relegated to status as an unobtainable or unsustainable luxury item. Sections of this size are important in enabling the planting of large trees, to foster biodiversity of native fauna and flora, and building a sense of community. Well-planned, well located and properly serviced low density residential environments can provide shape and edge to urban areas, and a form of amenity different from, but complementary to and no less legitimate in urban outcome terms, conventional GRZ/MDRZ zoned land.

8.32. Provision for low density residential in an urban setting, or failing that, in an adjoining rural zone is a fundamental gap in the PWDP. The Appellants provided the planning case for this housing typology to the District Council in a detailed submission to the proposed Rural Residential Strategy (**RRS**), seeking that the land identified in this submission be rezoned for conventional Rural Residential living 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. The Council decided that rural residential development at the Site could 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.

8.33. In light of the above decision on the Waimakariri Rural Residential Strategy, the rezoning sought in the Submission on the PWDP is for a form of high amenity, low density urban zoning, which although 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.

8.34. The rezoning sought is entirely consistent with the NPS description for the Large Lot Residential Zone (LLRZ) as:

> *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.*

8.35. 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:

(a) the zone boundary is 'mid block' so there is no natural or physical buffer between rural and residential areas;

(b) the existing pattern of 4 ha lots with existing substantial homes and gardens; and

(c) the fact that the premier large lot subdivision proposed relies on consistency of housing quality and character to deliver on this vision for the area.

8.36. The LLRZ D1 which is currently enabled through the PWDP is not consistent, the NPS description of a Large Lot Residential Zone, in requiring an average lot size of 5000m^2, which is far larger than is required for residential activities and buildings, and does not result in a compact urban form.

National Policy Statement on Highly Productive Land (**NPS-HPL**)

8.37. Although the Site contains some Class 2 and 3 soils as defined in the NZ Land Use Capability Inventory (Landcare Research), the rezoning sought

would not be prevented by the NPS-HPL, as it would not be a change from either a general rural or rural production zone. The soils on the Site do not come within the definition of "highly productive land" in clause 3.5.7(a)(i) of the NPS-HPL because the Site is zoned Rural Lifestyle in the PWDP, rather than General Rural or Rural Production.

8.38. The Site's Rural Zoning in the Operative District Plan, and the Rural Lifestyle Zoning in the Partially Operative District Plan (**PWDP**) enable subdivision to 4 hectares, so neither zoning constitutes a "general rural" or "rural production" zone in terms of the NPS-HPL. On that basis, changing the zoning of the Site to Large Lot Residential (LLRZ D2) or any of the other zones sought in the Submission would not constitute "urban rezoning" in terms of Clause 3.6 of the NPS-HPL.

8.39. Even if the Rezoning as sought was an "urban rezoning", it would meet the criteria of Clause 3.6 of the National Policy Statement on Highly Productive Land for rezoning to urban purposes. In particular, the current 4 hectare size of the lots, as well as the built forms and hard surfaces which have been established, and the location of the land at the urban edge of Rangiora, mean that the land cannot be used effectively and feasibly for productive purposes.

8.40. Further, the rezoning as sought:

(a) is required to provide sufficient development capacity to meet the demand for this type of housing, in this locality and market, to give effect to the NPS-UD; and

(b) there are no other reasonably practicable and feasible options for providing at least sufficient development capacity within the same locality and market while achieving a well-functioning urban environment; and

(c) the environmental, social, cultural and economic benefits of rezoning outweigh the long-term environmental, social, cultural and economic costs associated with the loss of highly productive

land for land-based primary production, taking into account both tangible and intangible values.

National Policy Statement on Indigenous Biodiversity (**NPS-IB**)

8.41. The Site does not contain any identified Significant Natural Areas (**SNA**).

8.42. The Site is currently used for a mix of low intensity (grazing) farming, and lifestyle purposes, including the establishment of shelter belts and utility buildings.

8.43. The rezoning sought would not adversely affect indigenous biodiversity , whether inside of or outside of SNAs, and would give effect to the NPS-IB.

Canterbury Regional Policy Statement (**CRPS**)

8.44. The Site is within the Greater Christchurch area, as shown on Map A of the CRPS (**Figure 2**, below), but is not shown as a Greenfield Priority Area – Residential (**GPA**), nor as a Future Development Area (**FDA**).

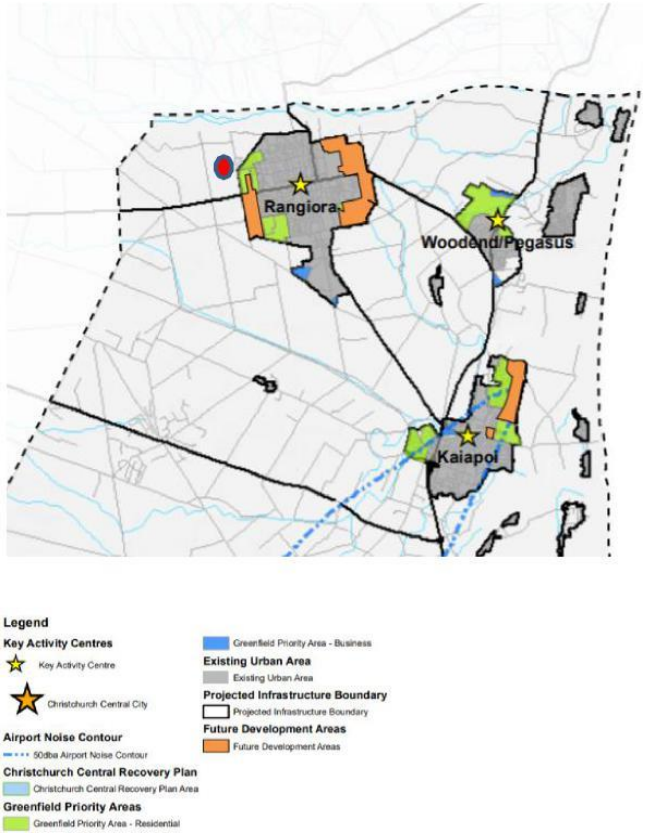

Figure 2: Map A Chapter 6 Canterbury Regional Policy Statement (Site identified with red circle, approximately)

8.45. The GPA terminates at Lehmans Road, and does not include land to the west of Lehmans Road which has since been rezoned to MDRZ in the PWDP, consistent with the NPS-UD.

8.46. The CRPS includes "housing capacity targets" which 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-UDC 2016) 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.

8.47. The CRPS does not give effect to the NPS-UD, in that it does not make any provision for housing densities between 10 households/ha (for urban zoning in Waimakariri) and average 1-2 households/ha for rural residential zoning. The proposed density for the Site which is sought in the Submission is approximately 6.66 households/ha.

8.48. Any inconsistency between Chapter 6 of the CRPS and the rezoning sought is a function of the fact that the CRPS predates the NPS-UD, and has not been appropriately updated to give effect to the NPS-UD. The proposed rezoning, seeking a lower density, high quality urban environment that attaches to an existing urban area and that promotes a coordinated pattern of development, does give effect to the NPS-UD, including Clause 3.8 Responsive Planning.

8.49. The rezoning of the Site as sought would achieve the relevant objectives and implement the relevant policies of the CRPS, including Objective 5.2.1, Policy 5.3.7, Policy 6.2.1 clauses 4 to 11, Policy 6.3.9 (except in relation to being a location identified in an adopted Rural Residential Strategy, and being at a higher density than provided for under this

policy, both of which requirements are inconsistent with the NPS-UD), and other objectives and policies relating to sustainability, integration of transport infrastructure and land use, urban design, biodiversity, natural hazards, landscape, soils, contaminated land.

8.50. The proposed Lehmans Road 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.

8.51. The Site 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
- Is 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
- 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, higher density rural residential character
- Is not intended as a staged development towards denser urban zoning; 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

WDDS

8.52. 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

8.53. 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)

8.54. 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.*

8.55. 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.

8.56. 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 and requirements of the NPS-UD. In any event the approach is focused on the need for housing in full urban residential form, and less on other residential development forms.

Mahaanui Iwi Management Plan (MIMP)

8.57. The Mahaanui Iwi Management Plan (**MIMP**) 2013 was released on 1 March 2013. It 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.

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

8.59. The proposed rezoning of the Site is consistent with the objectives and policies contained in the MIMP, including sections 5.3, 5.4, 5.5, and 6.4.

8.60. The proposal provides for full urban reticulation of the three waters and does not preclude individual land owners from installing rainwater collection and use from roof areas at the time of building development. 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.

8.61. Rezoning the Site as sought will not have adverse impact on the cultural values of iwi as set out within the MIMP.

Proposed (Partially Operative) Waimakariri District Plan (**PWDP**)

8.62. The Site is zoned RLZ in the PWDP as Proposed, and after Decisions on Submissions. It is also subject to, or potentially influenced by, a number of Overlays:

- Rangiora Airfield Take Off Climb and Approach Obstacle Limitation Surface
- National Grid Transmission Lines
- Liquefaction: Liquefaction damage is unlikely
- Non-Urban Flood Assessment Area
- Geographic areas: Ecological Area – Plains
- Ecological District – Low Plains

8.63. None of the matters addressed by the Overlays create an impediment to the rezoning sought.

8.64. Rezoning the Site as sought would anticipate the longer term growth path confirmed by the decisions on the Rural Residential Strategy (**RRS**) to protect the future growth option of more intensive urban development in this direction, and set a pathway to further westward expansion on land that holds few if any physical barriers to land development.

8.65. Rezoning the Site as sought will contribute to the housing needs of Rangiora and in a form and location that does not undermine the long

term 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 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.

8.66. The conversion of the Site from its present Rural Lifestyle use to low density, high quality residential use will continue a pattern of outward expansion of Rangiora. The proposed development will look and integrate as part of the urban fabric.

8.67. Rezoning 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; only the Zone boundaries and policy framework create a sense of it not being part of Rangiora.

8.68. Rezoning the Site will provide some replacement lower density living areas for the former LLR zones at north west Rangiora which have now been rezoned to GRZ or MRZ, but the replacement will be at a much more appropriate and efficient higher density than the LLR D1 standard of 1-2 hh/ha.

8.69. The proposed LLRZ D2 zoning 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.

8.70. Rangiora is growing quickly, and 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 Christchurch City.

8.71. Rangiora is well connected to Christchurch City, both via the new Northern Corridor, and a nascent cycleway link into the City. There is a very regular bus service, with the standard trip taking 70 minutes, and a twice daily weekday morning express service from Rangiora, and seven times weekday express out to Rangiora, all via Kaiapoi.

8.72. The Site is well connected to the Rakahuri / Ashley recreation trails, the racecourse, Arlington Park, the airfield and Rangiora town centre.

8.73. The Site can be appropriately serviced for LLR D2 zoning in relation to domestic water supply, wastewater, stormwater, roading and telecommunications.

8.74. Rezoning the Site as sought will contribute to a reduction in greenhouse gas emissions, in locating housing in a way which creates a compact urban form where the services and benefits of existing, established urban areas are readily accessible.

8.75. The proposed rezoning contributes to a triangle of planning influence that reduces greenhouse gas emissions, being:

(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.

8.76. Amendments to PWDP objectives and policies are necessary to provide for a higher density LLRZ on the Site, but those changes 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 the Submission and this Appeal).

8.77. 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.

8.78. The proposed rezoning is consistent with and the most appropriate, efficient and effective means of achieving the purpose and principles of the RMA.

8.79. The PWDP does not identify any Sites and Areas of Significance to Māori (**SASM**) in the Site.

8.80. The nearby Rakahuri/Ashley River is 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"*. The proposed development will not have adverse effects upon the Rakahuri/Ashley River SASM-025.

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

8.82. Both the preferred relief and the alternative relief are necessary to achieve sustainable growth and development of Rangiora and the District and meet the requirements of the NPS-UD, although the preferred relief is the better and more appropriate option.

Section 32 RMA

8.83. The RLZ zoning of the Site in the PWDP, and associated rules, (minimum lot size for subdivision and a dwelling 4ha) do not fulfil the requirements of section 32 of the RMA.

8.84. Council's strategic 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, and prohibits a hard-fixed unmoveable urban/rural boundary.

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

8.86. Neither Rural Lifestyle (RLZ) nor Large Lot Residential (LLRZ) as notified and decided 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 and several district reserves by active transport modes as well as by car.

8.87. If this Site is not zoned for LLRZ D2 use to enable residential re-development, then it will drive pressure to re-zone elsewhere. That step is unlikely to have the significant benefits to Rangiora long term which rezoning this Site has, 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.

8.88. 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.

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

8.90. In terms of section 32 of the RMA –

(a) The objectives of the proposal, being the re-zoning of the Site from RLZ zone to LLRZ D2 Zone, are the most appropriate method for achieving the purpose of the RMA; and

(b) The provisions in the proposal, being the specific plan provisions sought, including minimum and average lot sizes, are the most appropriate way to achieve the objectives, having regard to:

(i) other reasonably practicable options for achieving the objectives; and

(ii) the efficiency and effectiveness of the provisions in achieving the objectives; and

(iii) the reasons for deciding on the provisions; and

(c) the proposal has been appropriately evaluated, to a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal;

(d) there are significant environmental, economic, social, and cultural benefits of the proposal, and little or no environmental, economic, social and cultural costs of the proposal, including the opportunities for economic growth and employment that are anticipated to be provided;

(e) there is much greater risk in not acting to provide the rezoning requested than there is in granting the rezoning as sought.

8.91. In making the Decision, the Council failed to carry out its functions so as to achieve the purpose of the RMA.

9. We seek the following relief:

Preferred Relief:

9.1. Amend the Proposed (Partially Operative) Waimakariri District Plan (PWDP) Planning Maps by rezoning the following land from Rural Lifestyle Zone **(RLZ)** to Large Lot Residential – Specific Control Area Density 2 (**LLRZ SCA D2**), with a minimum net site area 1000m^2 and minimum average net site area 1500m^2 (or similar);

Registered Owner	Address	Appellation Title	Area (ha)
Dale & Jackie May	315 Lehmans Road	Lot 5 DP 83612	4.0000
Mike & Sharon Brown	311 Lehmans Road	Lot 6 DP 83612	4.0450
Paul and Denise Ward	305 Lehmans Road	Lot 7 DP 83612	4.7700
Rick and Lisa Allaway	285 Lehmans Road	Lot 8 DP 83612	4.3320
DA & JM Stewart	271 Lehmans Road	Lot 8 DP 328154	4.0008
WE Radford	267 Lehmans Road	Lot 7 DP 328154	4.0002
Jethro Larsen	265 Lehmans Road	Lot 6 DP 328154	4.0690
G & J Billington	263 Lehmans Road	Lot 5 DP 328154	4.0560
Ian Sunckell	261 Lehmans Road	Lot 4 DP 328154	4.3347
ME Vermeulen	259 Lehmans Road	Lot 3 DP 328154	4.4732
RL Mauger	257 Lehmans Road	Lot 2 DP 328154	4.1638
Kenny Moore	255 Lehmans Road	DP 328154	4.1295
Lionel Larsen	201 Lehmans Road	Lot 1 DP 83770	4.004
Jeanette Adriana Allison and Richard William Allison (Rangiora Vet Centre)	181 Lehmans Road	Lot 2 DP 83770	4.057
			58.4352 ha

9.2. Amend the PWDP Planning Maps by rezoning the properties listed above to Large Lot Residential – Specific Control Area Density 2 (**LLR-SCA D2**);

9.3. Change the notified proposed Large Lot Residential Zone to Large Lot Residential – Specific Control Area Density 1 (**LLR – SCA D1**), with minimum net site area 1500m^2 and minimum average net site area 1000m^2, and amend the PWDP Planning Maps to reflect this;

9.4. Include provision for some potential higher density residential development within the Site, potential location and suitability to be addressed as part of master planning and the development of an Outline Development Plan for the Site;

9.5. Amend the PWDP provisions as set out below: (additions in bold and underlined, and deletions as strike out):

UFD-P2

Identification/location of new Residential Development Areas ***and identification/location and extension of existing Residential Zones except the Large Lot Residential Zone***

In relation to the identification/location of residential development areas:

1. *residential development in the new Residential Development Areas at Kaiapoi, North East Rangiora, South East Rangiora and West Rangiora is located to implement the urban form identified in the Future Development Strategy ;*

2. *for new Residential Development Areas and **other residential zones**, other than those identified by (1) above, ~~avoid~~ residential development **shall generally** ~~unless located so that they~~:*

    a. *occur in a form that concentrates, or are attached to, an existing urban environment and promotes a coordinated pattern of development;*

    b. *occur in a manner that makes use of existing and planned transport and three waters infrastructure, or where such infrastructure is not available, upgrades, funds and builds infrastructure as required;*

    c. *have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including an ability to be serviced, over time, by ~~way of~~ public or active transport*

    d. ***~~concentrate~~** **encourage** higher density residential housing in locations **with good accessibility to** ~~focusing on~~ activity nodes such as key activity **and local** centres, schools, public transport routes and open space;*

    e. *take into account the need to provide for intensification of residential development while maintaining appropriate levels of amenity values on surrounding sites and streetscapes;*

    f. *are informed through the development of an ODP;*

    g. *supports reductions in greenhouse gas emissions; and*

    h. *are resilient to natural hazards and the likely current and future effects of climate change as identified in SD-O6.*

UFD-P3

2. *new Large Lot Residential development, other than addressed by (1) above, is located so that it:*

    a) *occurs in a form that is attached to an existing Large Lot Residential Zone, or Small Settlement Zone **or is in a township edge location** and promotes a coordinated pattern of development;*

    b) *is not located within an identified Development Area of the District's main towns of Rangiora, Kaiapoi and Woodend identified in the Future Development Strategy;*

c) ***except in the case of the LLR-SCA D2 Zone*** *is not on the direct edges of the District's main towns of Rangiora, Kaiapoi and Woodend, nor on the direct edges of these towns' identified new development areas as identified in the Future Development Strategy;*

SUB-O1

Subdivision design

Subdivision design achieves an integrated pattern of land use, development, and urban form, that:

1. *provides for anticipated land use and density that achieve the identified future character, form or function of zones;*

2. ~~*consolidates urban development and maintains rural character except where required for, and identified by, the District Council for urban development*~~

3. *supports protection of cultural and heritage values, conservation values; and*
4. *supports community resilience to climate change and risk from natural hazards.*

SUB-P6

c. *for new Residential Development Areas demonstrate how each ODP area will achieve a minimum net density of at least 15 lots or households per ha, unless there are demonstrated constraints then* ~~*no less than 12 households per ha*~~ ***a reduced density standard or density exemption shall apply****;*

SUB-P7

Requirements of Outline Development Plans

~~*Ensure that subdivision is in accordance with the fixed or flexible elements of any relevant ODP.*~~ ***Manage subdivision to ensure that the outcomes intended by the Outline Development Plan are met.***

SUB-S3

Residential subdivision of any area subject to an ODP, except in the Large Lot Residential Zone shall provide for a minimum net density of 15 households per ha, ***or the minimum density specified in the applicable Outline Development Plan, whichever is the lesser, or if*** *there are demonstrated constraints then* ***a density exemption shall apply.*** ~~*no less than 12 households per ha.*~~

Activity status when compliance not achieved: NC

SUB-S3 Residential Yield

Residential subdivision of any area subject to an ODP, except in the Large Lot Residential Zone, shall provide for a minimum net density of 15 households per ha, unless there are demonstrated constraints then ~~no less than 12 households per ha~~ ***a density exemption shall apply.***

General Objectives and Policies for all Residential Zones

The key difference between the General Residential Zone and Medium Density Residential Zone is housing density, with the latter located within walkable distance to town centres, schools, open space and transport routes. The Settlement Zone differs from both of these zones, providing for a greater range of commercial activity, as the settlements do not have their own business zones. The Large Lot Residential Zone provides for ~~very~~ low density ***residential and*** *rural residential living opportunities with a* ***more*** *open, spacious character* ***than other residential zones.***

RESZ-O5

Housing choice

A wide range of housing types, sizes and densities are available in each township to meet housing needs. *~~the needs of the community through~~*

~~1. a range of residential unit types; and~~
~~2. a variety of residential unit densities~~

RESZ-P14

1. *in new Development Areas, achieve a minimum net density of 15 households per ha averaged across the whole of the residential Development Area within the relevant ODP, unless there are demonstrated constraints* ***then a density exemption shall apply. Constraints may include but not be limited to landscape and ground conditions, and existing subdivision and housing patterns.****~~less than 12 households per ha.~~*

2. *in new Large Lot Residential Zones ~~Overlays~~, achieve ~~a~~* ***a average*** *net dens~~ity~~****ies of***

   LLR-SCA Density 1 - *1 to 2 households per ha*

   LLR-SCA Density 2 - 1500m²

LLRZ - Large Lot Residential Zone

The purpose of the Large Lot Residential Zone is to provide residential living opportunities for predominantly detached residential units on lots larger than other Residential Zones. The Large Lot Residential Zone are

located near but outside the established townships, ***other than the LLR-SCA Density 2 Zone located at the township edge****. Some opportunity is also provided for rural activities where the effects of these activities will not detract from the purpose, character and amenity values of the residential zone.*

There are particular landscape characteristics, physical limitations or other constraints to more intensive development. Any opportunity for intensification is reliant on sites being appropriately serviced, ***and*** *natural hazard risk being managed. ~~and the density requirements for rural residential development directed by the RPS being achieved.~~*

LLRZ-O1

"...

1. *is of low density detached residential units set on generous**ly sized** sites;*
2. ***is an environment with generally lower levels of noise and traffic than other residential zones, and low levels of odour and dust;***
3. ***LLR - SCA D1*** *- has a predominance of open space over built form;*
4. ~~*is an environment with generally lower levels of noise, traffic than other residential zones, and low levels of , outdoor lighting, odour and dust; and*~~
5. ***LLR - SCA D1*** *- provides opportunities for agriculture activities where these do not detract from maintaining a quality residential environment, but provides limited opportunities for other activities.*
6. ***LLR - SCA D2 - enables high amenity residential areas providing scope for large houses on large residential sites;..."***

LLRZ-P1(2)

"2. managing the scale and location of buildings so as to maintain a sense of openness and space between buildings on adjoining sites and ensuring that ***in the case of the LLR-SCA D1 zone*** *open space predominates over built form on each site."*

LLRZ-P4(2)

"...

2. ***LLR-SCA D1*** *- limiting kerb, channel and street lighting compared to other Residential Zones."*

LLRZ-BFS1

"LLRZ-BFS1 Site density
Site density shall be a maximum of:
- One residential unit per 1500m² of net site area, or
- One residential unit on any site less than 1500m² Minimum net site area - 1000m² ..."

LLRZ-BFS4

*"LLRZ-BFS4 Impermeable surface - **does not apply to Large Lot Residential - Specific Control Area Density 2 (LLR-SCA D2)** The maximum impermeable surface of any site shall be 20% of the net site area. Activity status when compliance not achieved: DIS"*

9.6. Any consequential, further or alternative amendments to the PSDP to be consistent with and give effect to the intent of the Submission and the interests of the Appellants, including any changes necessary to give effect to the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 or the NPS-UD.

Alternative Relief:

9.7. Amend Proposed Waimakariri District Plan (PWDP) Planning Maps by rezoning the land identified above from Rural Lifestyle Zone to Low Density Residential Zone; or General Residential Zone; or Large Lot Residential Zone (with density standards as per notified PWDP); or a mix of any of those zones and Large Lot Residential **–** Specific Control Area Density 2 (**LLRZ**), with a minimum net site area 1000m^2 and minimum average net site area 1500m^2 (or similar), or Large Lot Residential Zone Density 1 (**LLR – SCA D1**) with minimum and minimum average lot sizes of 2500m^2 and 5000m^2 respectively, Low Density Residential with minimum and minimum average lot sizes 1000m^2 and 1500m^2 respectively, or General Residential Zone;

9.8. Include provision for some potential higher density residential development within the Site, potential location and suitability to be addressed as part of master planning and the development of an Outline Development Plan for the Site;

9.9. If Low Density Residential Zone is granted, include appropriate applicable amendments listed above under Preferred Relief, and specific provisions (including objectives and policies) for the Low Density Residential Zone, including:

LRZ-O1

LRZ- Objectives
LRZ – O1 The Low Density Residential Zone provides for residential activity and is characterised by low density and spacious housing typologies consistent with a suburban character.

LRZ-P1

LRZ- Policies
LRZ – P1 Enable activities that support and maintain a suburban character by managing the number of residential units that can be accommodated on each site and requiring:

1. ***a generally low rise built form consisting of single and two storey detached residential units; and***

2. ***appropriate levels of openness around residential units which provides for residents' on-site amenity.***

9.10. Any consequential, further or alternative amendments to the PWDP to be consistent with and give effect to the intent of the submission and the interests of the Appellant, by way of granting either the preferred relief or the alternative relief, including any changes necessary to give effect to the requirements of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act or the NPS-UD.

9.11. Such other further or consequential relief as may give effect to the concerns raised in this Notice of Appeal;

9.12. Costs.

10. We attach the following documents to this notice:

(a) copies of our Submission on the PWDP;

(b) a copy of the relevant decision (or part of the decision);

(c) any other documents necessary for an adequate understanding of the appeal:

(i) Further Submission of Damian & Sarah Elley;

(ii) Further Submission of Kim Manson & Neihana Kuru;

(iii) Further Submission of Ross Fraser;

(iv) Further Submission of L N R deLacy;

(v) Further Submission of Louise Marriott;

(vi) Further Submission of Malcolm Dartnell;

(vii) Further Submission of Transpower New Zealand Limited; and

(viii) Further Submission of Waka Kotahi NZ Transport Agency.

(d) a list of names and addresses of persons to be served with a copy of this notice.

DATED this 21st day of August 2025

Margo Perpick

Counsel for the Appellants

ADDRESS FOR SERVICE OF APPELLANTS:

Saunders & Co
131 Victoria Street
Christchurch

Telephone: 027 227 2026 or 03 379 7690
Email: margo.perpick@saunders.co.nz
Contact Person: Margo Perpick

Note to appellant

You may use this form for any appeal for which you cannot identify a prescribed form.

You must lodge the original and 1 copy of this notice with the Environment Court. The notice must be signed by you or on your behalf. You must pay the filing fee required by regulation 35 of the Resource Management (Forms, Fees, and Procedure) Regulations 2003.

Your right to appeal may be limited by the trade competition provisions in Part 11A of the Resource Management Act 1991.

Advice to recipients of copy of notice of appeal

How to become a party to proceedings

If you wish to become a party to the appeal, you must,—

(a) within 15 working days after the period for lodging a notice of appeal ends, lodge a notice of your wish to be a party to the proceedings (in form 33) with the Environment Court and serve copies of your notice on the relevant local authority and the appellant; and

(b) within 20 working days after the period for lodging a notice of appeal ends, serve copies of your notice on all other parties.

You may apply to the Environment Court under section 281 of the Resource Management Act 1991 for a waiver of the above timing requirements (*see* form 38).

Your right to be a party to the proceedings in the court may be limited by the trade competition provisions in section 274(1) and Part 11A of the Resource Management Act 1991.

Advice

If you have any questions about this notice, contact the Environment Court in Auckland, Wellington, or Christchurch.

Submission on Proposed Waimakariri District Plan

Rick Allaway and Lionel Larsen

November 2021

Waimakariri District Council

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RESOURCE MANAGEMENT ACT 1991

WAIMAKARIRI DISTRICT COUNCIL

SUBMISSION ON THE PROPOSED WAIMAKARIRI DISTRICT PLAN

Submitter Details

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Trade Competition:

Ability to gain a trade competition advantage through this submission - No

Hearing Options:

We do wish to be heard in support of our submission. If others are making a similar submission, we may consider presenting a joint case with them at the hearing.

Specific Provisions to Which this Submission Relates:

All of the Proposed Waimakariri District Plan (PWDP), including but not limited to:

District Planning Maps

General District Wide Matters – Strategic Directions, UG Urban Growth

Area Specific Matters – New Development Areas – West Rangiora Development Area,

Residential Zones

Decision we wish the Council to make:

Preferred Relief:

1. Amend Proposed Waimakariri District Plan (PWDP) Planning Maps by rezoning the following land from Rural Lifestyle Zone **(RLZ)** to Large Lot Residential – Specific Control Area Density 2 (**LLRZ**), with a minimum net site area 1000m^2 and minimum average net site area 1500m^2 (or similar).

Registered Owner	**Address**	**Appellation Title**	**Area (ha)**
Dale & Jackie May	315 Lehmans Road	Lot 5 DP 83612	4.0000
Mike & Sharon Brown	311 Lehmans Road	Lot 6 DP 83612	4.0450
Paul and Denise Ward	305 Lehmans Road	Lot 7 DP 83612	4.7700
Rick and Lisa Allaway	285 Lehmans Road	Lot 8 DP 83612	4.3320
DA & JM Stewart	271 Lehmans Road	Lot 8 DP 328154	4.0008
WE Radford	267 Lehmans Road	Lot 7 DP 328154	4.0002
Fiona Mules	265 Lehmans Road	Lot 6 DP 328154	4.0690
G & J Billington	263 Lehmans Road	Lot 5 DP 328154	4.0560
Ian Sunckell	261 Lehmans Road	Lot 4 DP 328154	4.3347
ME Vermeulen	259 Lehmans Road	Lot 3 DP 328154	4.4732
RL Mauger	257 Lehmans Road	Lot 2 DP 328154	4.1638
Kenny Moore	255 Lehmans Road	Lot 1 DP 328154	4.1295
Lionel Larsen	201 Lehmans Road	Lot 1 DP 83770	4.004
Jeanette Adriana Allison and Richard William Allison (Rangiora Vet Centre)	181 Lehmans Road	Lot 2 DP 83770	4.057
			58.4352 ha

2. Amend PWDP Planning Maps by rezoning the properties listed in 1. above to Large Lot Residential – Specific Control Area Density 2 (**LLR-SCA D2**).
3. Change the notified proposed Large Lot Residential Zone to Large Lot Residential – Specific Control Area Density 1 (LLR – SCA D1), with minimum net site area 1500m^2 and minimum average net site area 1000m^2; amend the PWDP Planning Maps to reflect this.
4. Include provision for some potential higher density residential development within the Site,

potential location and suitability to be addressed as part of master planning and the development of an Outline Development Plan for the Site.

5. Amend the PWDP provisions as set out below: (additions in bold and underlined, and deletions as strike out)
6. Any consequential, further or alternative amendments to the PWDP to be consistent with and give effect to the intent of this submission and the interests of the Submitter, including any changes necessary to give effect to the Enabling Housing Supply and Other Matters Resource Management Amendment Act (when it becomes law).

Part 2 – District Wide Matters

Strategic Directions

SD-02

Urban development and infrastructure that:…

*4. provides a range of housing opportunities, focusing new residential activity within existing towns, and identified development areas in Rangiora and Kaiapoi, in order to **as a minimum** achieve the housing bottom lines in UFD-O1*

UFD-O1

Feasible development capacity for residential activities

***At least s~~S~~ufficient feasible development capacity for residential activity in each township** to meet specified housing bottom lines**, a wide range of housing types, sizes and densities** and a changing demographic profile of the District as follows:…*

UFD-O2

Feasible development capacity for commercial activities and industrial activities

At least s~~S~~ufficient feasible development capacity to meet commercial and industrial development demand.

UFD-P2 (applies under Alternative Relief)

*Identification/location of new Residential Development Areas **and identification/location and extension of existing Residential Zones except the Large Lot Residential Zone***

In relation to the identification/location of residential development areas:

1. residential development in the new Residential Development Areas at Kaiapoi, North East Rangiora, South East Rangiora and West Rangiora is located to implement the urban form identified in the Future Development Strategy ;

*2. for new Residential Development Areas and **other residential zones**, other than those identified by*

*(1) above, ~~avoid~~ residential development **shall generally** ~~unless located so that they~~:*

a. *occur in a form that concentrates, or are attached to, an existing urban environment and promotes a coordinated pattern of development;*
b. *occur in a manner that makes use of existing and planned transport and three waters infrastructure, or where such infrastructure is not available, upgrades, funds and builds infrastructure as required;*
c. *have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including an ability to be serviced, over time, by ~~way of~~ public or active transport*
d. ***~~concentrate~~ encourage** higher density residential housing in locations **with good accessibility to** ~~focusing on~~ activity nodes such as key activity **and local** centres, schools, public transport routes and open space;*
e. *take into account the need to provide for intensification of residential development while maintaining appropriate levels of amenity values on surrounding sites and streetscapes;*
f. *are informed through the development of an ODP;*
g. *support~~s~~ reductions in greenhouse gas emissions,; and*
h. *are resilient to natural hazards and the likely current and future effects of climate change as identified in SD-O6.*

UFD-P3

Identification/location and extension of Large Lot Residential Zone areas

In relation to the identification/location of Large Lot Residential Zone areas:

1. *new Large Lot Residential development is located in the Future Large Lot Residential Zone Overlay which adjoins an existing Large Lot Residential Zone as identified in the RRDS and is informed through the development of an ODP;*
2. *new Large Lot Residential development, other than addressed by (1) above, is located so that it:*
   a) *occurs in a form that is attached to an existing Large Lot Residential Zone, ~~or~~ Small Settlement Zone **or is in a township edge location** and promotes a coordinated pattern of development;*
   b) *is not located within an identified Development Area of the District's main towns of Rangiora, Kaiapoi and Woodend identified in the Future Development Strategy;*
   c) ***except in the case of the LLR-SCA D2 Zone** is not on the direct edges of the District's main towns of Rangiora, Kaiapoi and Woodend, nor on the direct edges of these towns' identified new development areas as identified in the Future Development Strategy;*
   d) *occurs in a manner that makes use of existing and planned transport infrastructure and the wastewater system, or where such infrastructure is not available, upgrades, funds and builds infrastructure as required, to an acceptable standard; and*
   e) *is informed through the development of an ODP.*

UFD-P6 (applies under Alternative Relief)

Mechanism to release Residential Development Areas

*The release of land within the identified new development areas of Kaiapoi, **West Rangiora,** North East Rangiora and South East Rangiora occurs in an efficient and timely manner via a certification process to enable residential activity to meet **or exceed** short to medium-term feasible development capacity and achievement of housing bottom lines.*

UFD-P10

Managing reverse sensitivity effects from new development

Within Residential Zones and new development areas in Rangiora and Kaiapoi:

1. *avoid residential activity that has the potential to limit the efficient and effective operation and upgrade of critical infrastructure, strategic infrastructure, and regionally significant infrastructure, including avoiding noise sensitive activities within the Christchurch Airport Noise Contour, unless within an existing Residential Zone;*
2. *minimise reverse sensitivity effects on primary production from activities within new development areas through setbacks and screening **or other methods**, without compromising the efficient delivery of new development areas.*

Subdivision

SUB-O1

Subdivision design

Subdivision design achieves an integrated pattern of land use, development, and urban form, that:

1. *provides for anticipated land use and density that achieve the identified future character, form or function of zones;*
2. ~~*consolidates urban development and maintains rural character except where required for, and identified by, the District Council for urban development;*~~
3. *supports protection of cultural and heritage values, conservation values; and*
4. *supports community resilience to climate change and risk from natural hazards.*

SUB-P6

Criteria for Outline Development Plans

Ensure that new Residential Development Areas, new Large Lot Residential Zones, new Commercial and Mixed Use Zones and new Industrial Zones shall not be subdivided until an ODP for that area has been included in the District Plan and each ODP shall:…..

1. *be prepared as a single plan; and*
2. *be prepared in accordance with the following:*

c. *for new Residential Development Areas demonstrate how each ODP area will achieve a minimum net density of at least 15 lots or households per ha, unless there are demonstrated constraints then ~~no less than 12 households per ha~~* ***a reduced density standard or density exemption shall apply****;*

SUB-P7

Requirements of Outline Development Plans

*~~Ensure that subdivision is in accordance with the fixed or flexible elements of any relevant ODP.~~****Manage subdivision to ensure that the outcomes intended by the Outline Development Plan are met.***

SUB-S3 Residential yield

Residential subdivision of any area subject to an ODP, except in the Large Lot Residential Zone shall provide for a minimum net density of 15 households per ha, ***or the minimum density specified in the applicable Outline Development Plan, whichever is the lesser, or if*** *there are demonstrated constraints then* ***a density exemption shall apply.*** *~~no less than 12 households per ha~~.*

Activity status when compliance not achieved: NC

SUB-S3 Residential Yield

Residential subdivision of any area subject to an ODP, except in the Large Lot Residential Zone, shall provide for a minimum net density of 15 households per ha, unless there are demonstrated constraints then ~~no less than 12 households per ha~~ ***then a density exemption shall apply.***

SUB-S4 Areas subject to an ODP – retain as notified

Any subdivision shall comply with the relevant ODP and rules for the ODP, as set out in the Development Areas Chapter of the District Plan.

Activity status when compliance not achieved: DIS

General Objectives and Policies for all Residential Zones

The purpose of the chapter is to provide for and manage activities within new and existing residential areas. These areas include the existing settlements throughout the District, as well as the larger urban environments of Oxford, Rangiora, Kaiapoi, Woodend and Pegasus. It also addresses activities taking place in the rural residential areas for the District, which are incorporated within the Large Lot Residential Zone.

This chapter contains objectives and policies relating to the:

- *General Residential Zone;*
- *Medium Density Residential Zone;*
- *Settlement Zone; and*
- *Large Lot Residential Zone.*

The key difference between the General Residential Zone and Medium Density Residential Zone is housing density, with the latter located within walkable distance to town centres, schools, open space and transport routes. The Settlement Zone differs from both of these zones, providing for a greater range of commercial activity, as the settlements do not have their own business zones. The Large Lot Residential Zone provides for ~~very~~ low density ***residential and*** *rural residential living opportunities with a* ***more*** *open, spacious character* ***than other residential zones.***

RESZ-O5

Housing choice

A wide range of housing types, sizes and densities are available in each township to meet housing needs. *~~the needs of the community through~~*

1. *~~a range of residential unit types; and~~*
2. *~~a variety of residential unit densities~~*

RESZ-P14

Development density

Development densities for new Development Areas and Large Lot Residential Zone Overlays shall be as follows:

1. *in new Development Areas, achieve a minimum net density of 15 households per ha averaged across the whole of the residential Development Area within the relevant ODP, unless there are demonstrated constraints then* ***a density exemption shall apply. Constraints may include but not be limited to landscape and ground conditions, and existing subdivision and housing patterns.*** *~~less than 12 households per ha.~~*
2. *in new Large Lot Residential Zone ~~Overlays~~, achieve ~~a~~* ***average*** *net density~~y~~****ies of***
   LLR-SCA Density 1 - *1 to 2 households per ha*
   LLR-SCA Density 2 - 1500m²

LLRZ - Large Lot Residential Zone

Introduction

The purpose of the Large Lot Residential Zone is to provide residential living opportunities for predominantly detached residential units on lots larger than other Residential Zones. The Large Lot Residential Zone are located near but outside the established townships, ***other than the LLR-SCA Density 2 Zone located at the township edge****. Some opportunity is also provided for rural activities where the effects of these activities will not detract from the purpose, character and amenity values of the residential zone.*

There are particular landscape characteristics, physical limitations or other constraints to more intensive development. Any opportunity for intensification is reliant on sites being appropriately serviced, natural hazard risk being managed. ~~and the density requirements for rural residential development directed by the~~

~~*RPS being achieved.*~~

Objectives

LLRZ-O1

Purpose, character and amenity values of Large Lot Residential Zone

A high quality, low density residential zone with a character distinct to other Residential Zones such that the predominant character:

1. *is of low density detached residential units set on generous* ***sized*** *sites;*
2. ***is an environment with generally lower levels of noise and traffic than other residential zones, and low levels of odour and dust;***
3. ***LLR – SCA D1 -*** *has a predominance of open space over built form;*
4. ~~*is an environment with generally low* ***er*** *levels of noise, traffic* ***than other residential zones, and low levels of*** *, outdoor lighting, odour and dust; and*~~
5. ***LLR – SCA D1 -*** *provides opportunities for agriculture activities where these do not detract from maintaining a quality residential environment, but provides limited opportunities for other activities.*
6. ***LLR – SCA D2 – enables high amenity residential areas providing scope for large houses on large residential sites;***

Policies

LLRZ-P1

Maintaining the qualities and character

Maintain the qualities and character of the Large Lot Residential Zone by:

1. *achieving a low density residential environment with a built form dominated by detached residential units, which other than minor residential units, are established on their own separate sites;*
2. *managing the scale and location of buildings so as to maintain a sense of openness and space between buildings on adjoining sites and ensuring that* ***in the case of the LLR-SCA D1 zone*** *open space predominates over built form on each site;*
3. *ensuring the built form for all activities is consistent with the low density residential character of the zone; and*
4. *retaining the open character and outlook from sites to rural areas through managing boundary fencing including the style of fencing, their height and visual permeability.*

LLRZ-P2

Managing activities

Manage activities within the zone to maintain the character and amenity values of the zone including by:

1. *enabling residential activities and activities ancillary to residential activities, where the scale of activity does not dominate the residential use of the site;*
2. *providing for agricultural activities, and activities that support agricultural activities where any*

adverse effects are internalised within the site where the activity occurs;

3. *providing for a limited range of community activities, and commercial activities which in terms of location, scale and type of activity are compatible with the predominant activities of the zone, which ensuring that adverse effects of any activity are internalised within the site where the activity occurs; and*
4. *other than provided for above, non-residential activities, including retail, commercial and industrial activities that would diminish the amenity values and the quality and character of the zone.*

LLRZ-P3

Reverse sensitivity

Minimise reverse sensitivity effects within the Large Lot Residential Zone or on an existing activity in an adjacent zone by:

1. *requiring new activities minimise the potential for reverse sensitivity effects to occur on activities anticipated in the zone; and*
2. *requiring separation distances between new activities in the Large Lot Residential Zone and existing activities in adjacent zones.*

LLRZ-P4

Amenity values

Maintain amenity values within the Large Lot Residential Zone through:

1. *low levels of noise, outdoor lighting, signs, dust, odour and traffic; and*
2. ***LLR-SCA D1 -** limiting kerb, channel and street lighting compared to other Residential Zones.*

LLRZ-P5

Large Lot Residential Zone Overlay

For any Large Lot Residential Zone Overlay, ensure an ODP is developed in accordance with SUB-P6 and incorporated into the District Plan.

LLR-Built Form Standards

Amend LLR Built form standards for the LLR-SCA D2 Zone as follows:

LLRZ-BFS1 Site density

Site density shall be a maximum of:

- ***One residential unit per 1500m^2 of net site area, or***
- ***One residential unit on any site less than 1500m^2.***

Minimum net site area – 1000m^2.

This rule does not apply to a minor residential unit or residential unit in a retirement village.

Activity status when compliance not achieved: NC

LLRZ-BFS2 Building coverage

The maximum building coverage shall be 40% of the net site area of any site.

Activity status when compliance not achieved: DIS

LLRZ-BFS4 Impermeable surface – ***does not apply to LLR-SCA D2***

The maximum impermeable surface of any site shall be 20% of the net site area.

Activity status when compliance not achieved: DIS

LLRZ-BFS6 Building and structure setbacks

1. *Any building or structure, other than a fence, shall be set back a minimum of:*
    a) *4m from any road boundary;*
    b) *10m from any boundary with a General Rural Zone or Rural Lifestyle Zone; and*
    c) *2m from any site boundary.*
2. *On corner sites any structure or vegetation exceeding 1m in height above ground level shall not be located within the structure and vegetation setback area identified by Figure LLRZ-1.*
3. *Any habitable building or building housing a sensitive activity shall have a setback a minimum distance of:*
    a) *20m from any existing intensive indoor primary production, or intensive outdoor primary production where it is located on the same site.*
    b) *300m from any existing intensive indoor primary production, or intensive outdoor primary production where it is located on a site in different ownership; and*
    c) *300m from any existing quarry where it is located on a site in different ownership.*
4. *All buildings shall be set back a minimum of 4m from any site boundary with the rail corridor.*

Activity status when compliance not achieved: RDIS

Matters of discretion are restricted to:

RES-MD2 - Residential design principles

RES-MD5 - Impact on neighbouring property

RES-MD6 - Road boundary setback

RURZ-MD2 - Housing of animals

Alternative Relief

1. Amend Proposed Waimakariri District Plan (PWDP) Planning Maps by rezoning the land identified in Preferred relief 1. from l Rural Lifestyle Zone to Low Density Residential Zone; or General Residential Zone; or Large Lot Residential Zone (density standards as per notified PWDP; or a mix of any of and Large Lot Residential – Specific Control Area Density 2 (**LLRZ**), with a minimum net site area 1000m^2 and minimum average net site area 1500m^2

(or similar), LLR-SCA Density 1(minimum and minimum average lot sizes 2500m^2 and 5000m^2 respectively, Low Density Residential (minimum and minimum average lot sizes 1000m^2 and 1500m^2 respectively, or General Residential Zone

2. Include provision for some potential higher density residential development within the Site, potential location and suitability to be addressed as part of master planning and the development of an Outline Development Plan for the Site.
3. Any consequential, further or alternative amendments to the PWDP to be consistent with and give effect to the intent of the alternative relief and the intent of the submission and the interests of the Submitter, including any changes necessary to give effect to the requirements of the Enabling Housing Supply and Other Matters Resource Management Amendment Act. This includes applicable amendments under Preferred Relief, and specific provisions (including objectives and policies) for the Low Density Residential Zone. These could include:

LRZ-Objectives

LRZ – O1

The Low Density Residential Zone provides for residential activity and is characterised by low density and spacious housing typologies consistent with a suburban character.

LRZ-Policies

LRZ – P1

Enable activities that support and maintain a suburban character by managing the number of residential units that can be accommodated on each site and requiring:

1. *a generally low rise built form consisting of single and two storey detached residential units; and*
2. *appropriate levels of openness around residential units which provides for residents on-site amenity*

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 lots[1] 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.

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

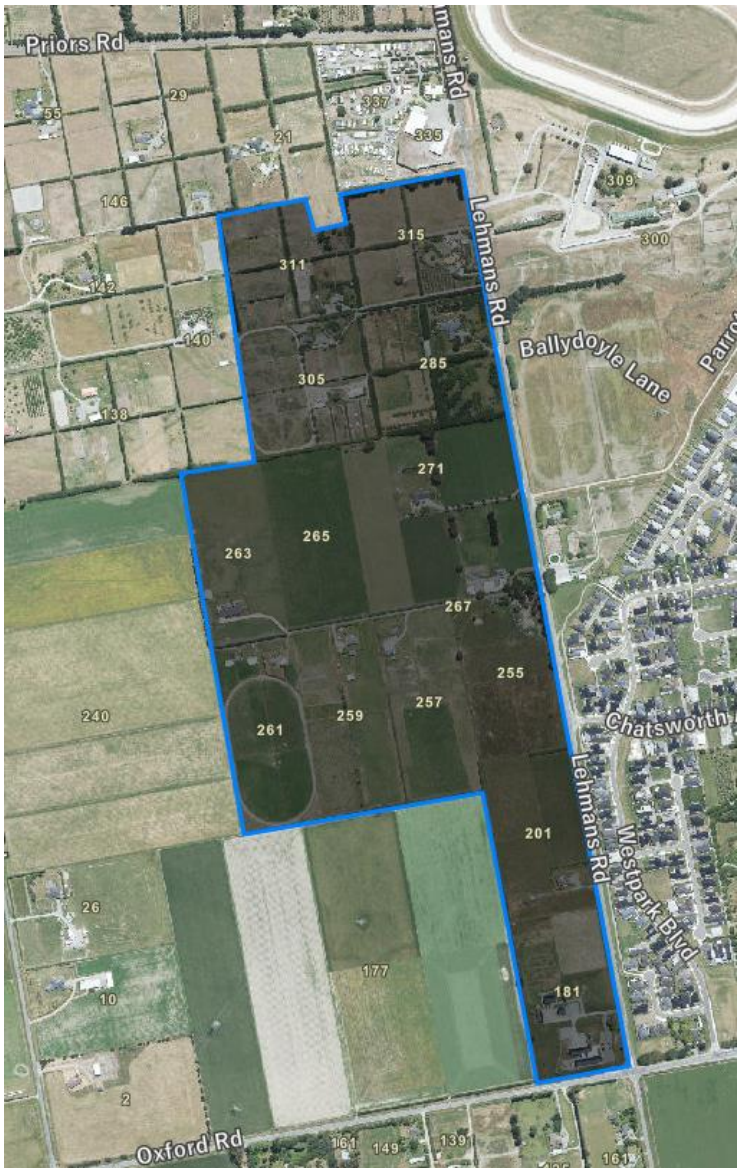


Figure 1: The site (outlined in blue (Google Earth)

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.

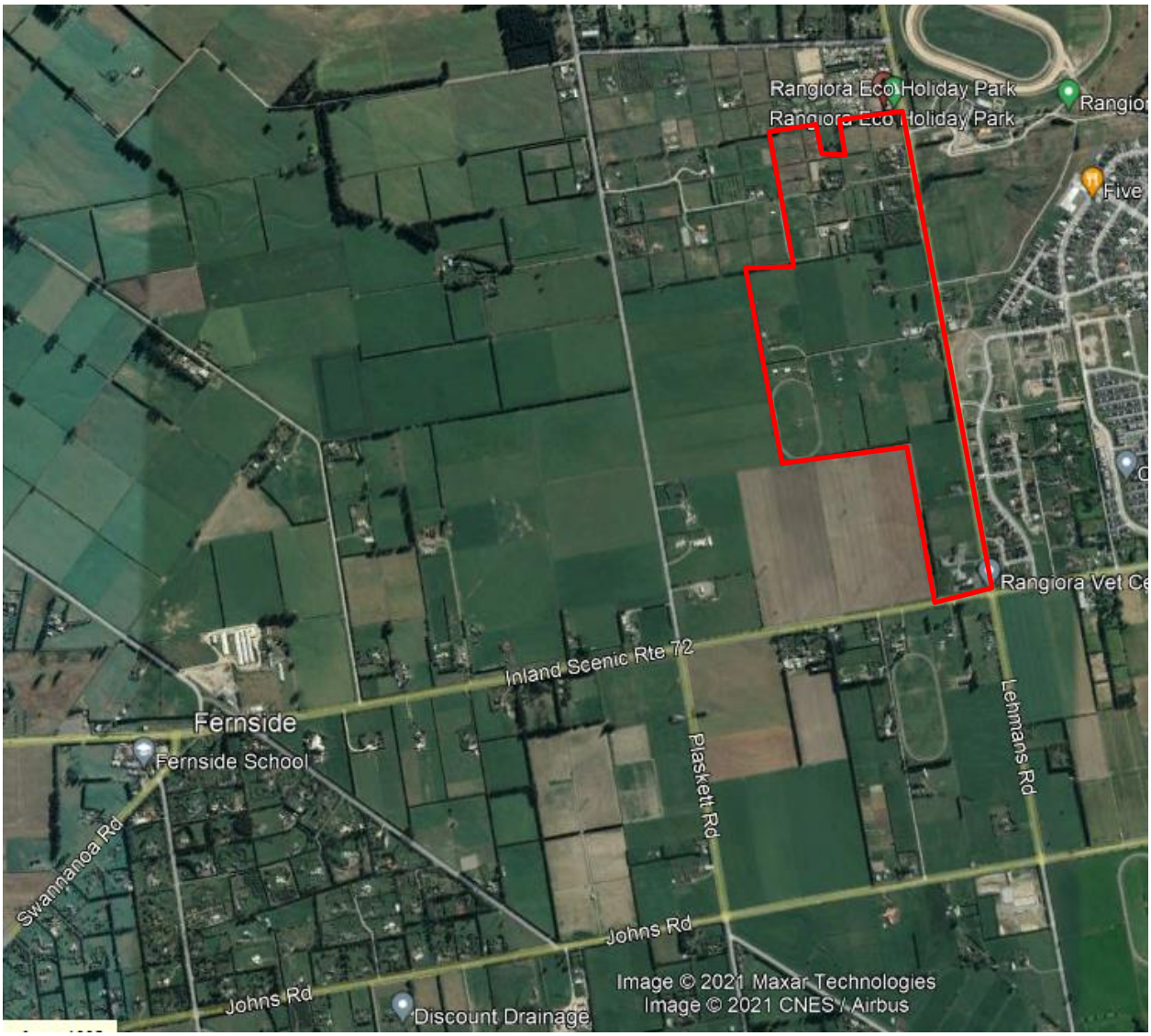


Figure 2: the site is a broader context (Site marked red)

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

					Average annual change, June 2018–2020 P		Population change, year ended 30 June 2021 P		
					Number	%	Number		%
Waimakariri district	2018	2019	2020P	2021P					
	61,300	62,800	64,800	66,300	1,700	2.8		1,500	2.2

Statistics NZ population projections.

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).

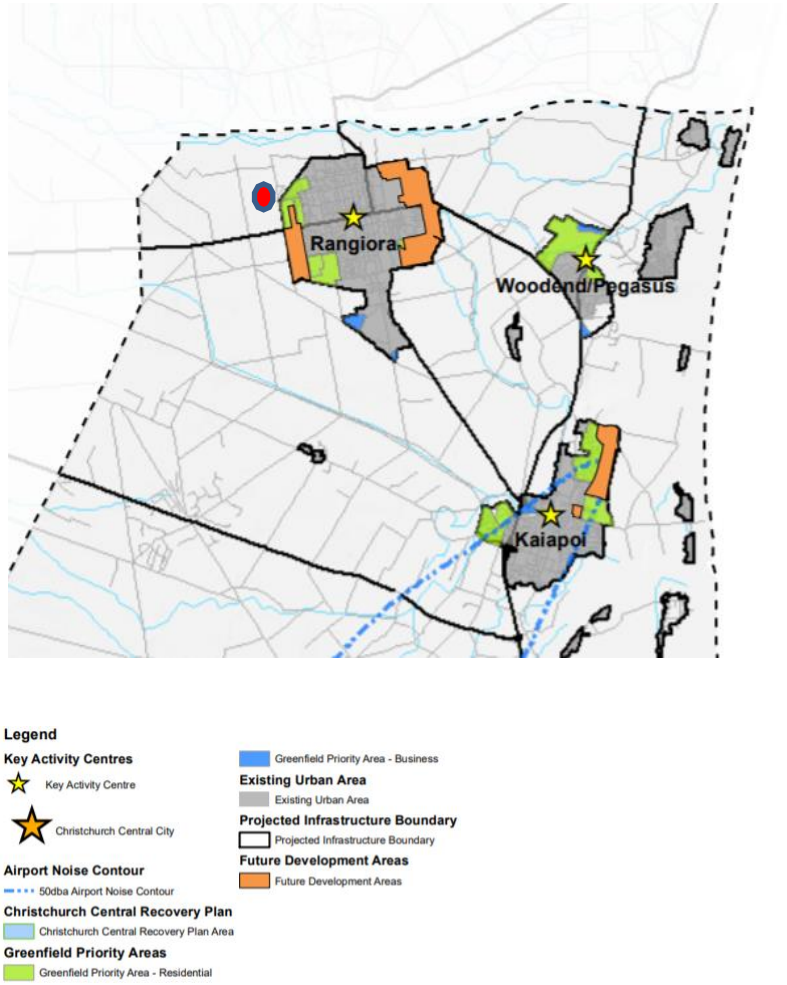


Figure 4: Map A Chapter 6 Regional Policy Statement Greenfield Priority areas

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 re-zoning 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 1500m^2 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.

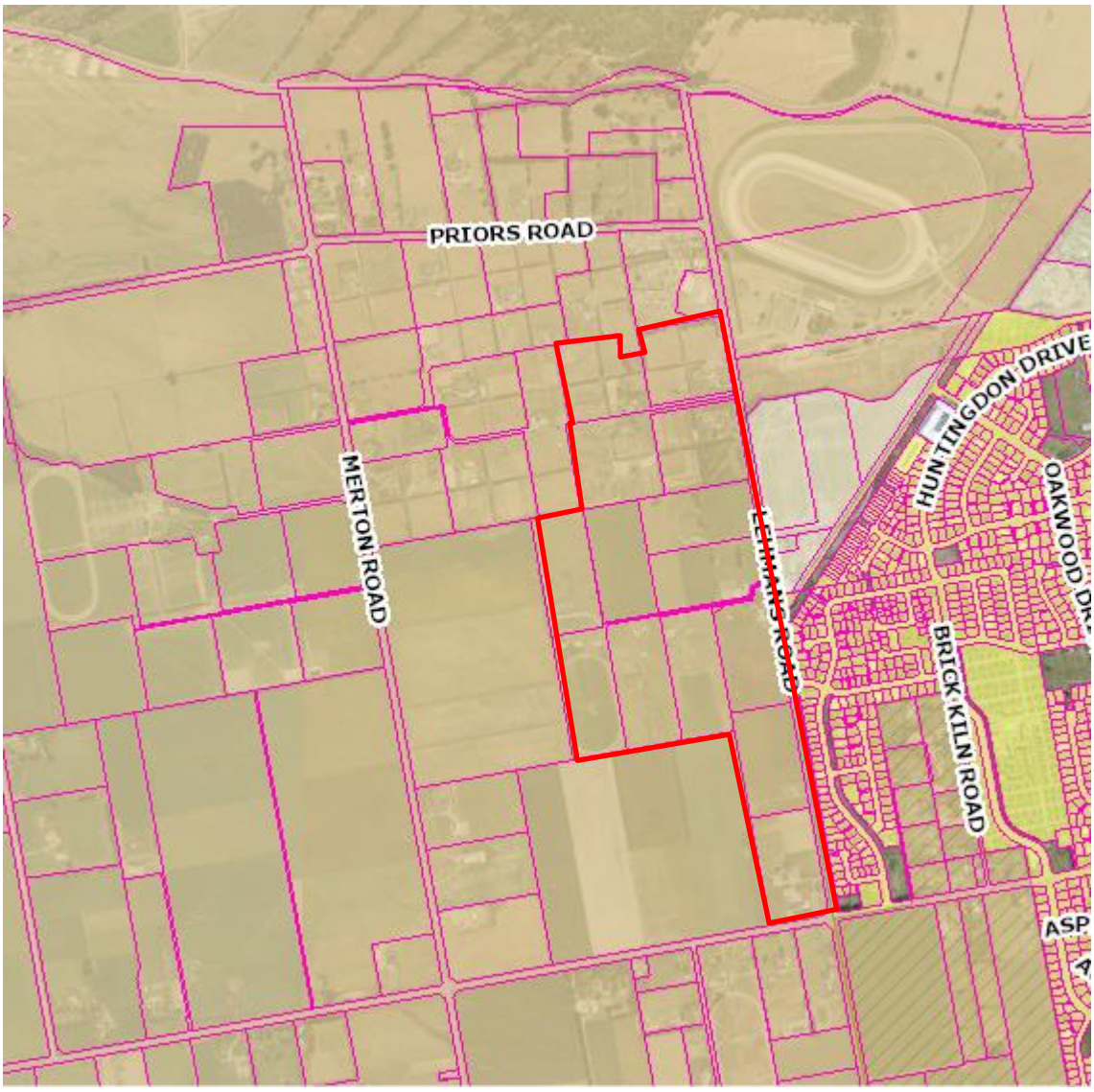


Figure 5: Proposed District Plan Zoning (site outlined in red)

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

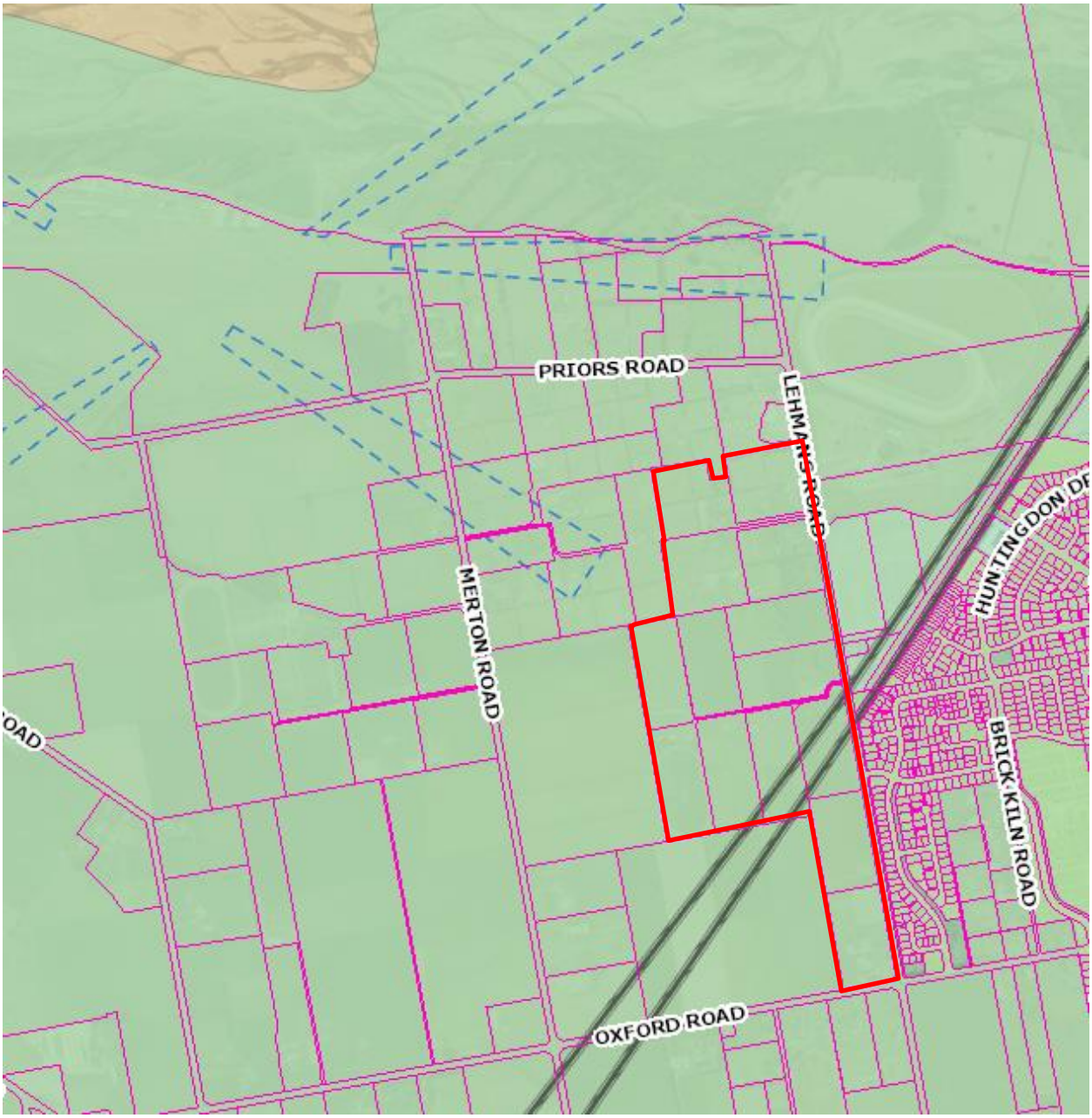
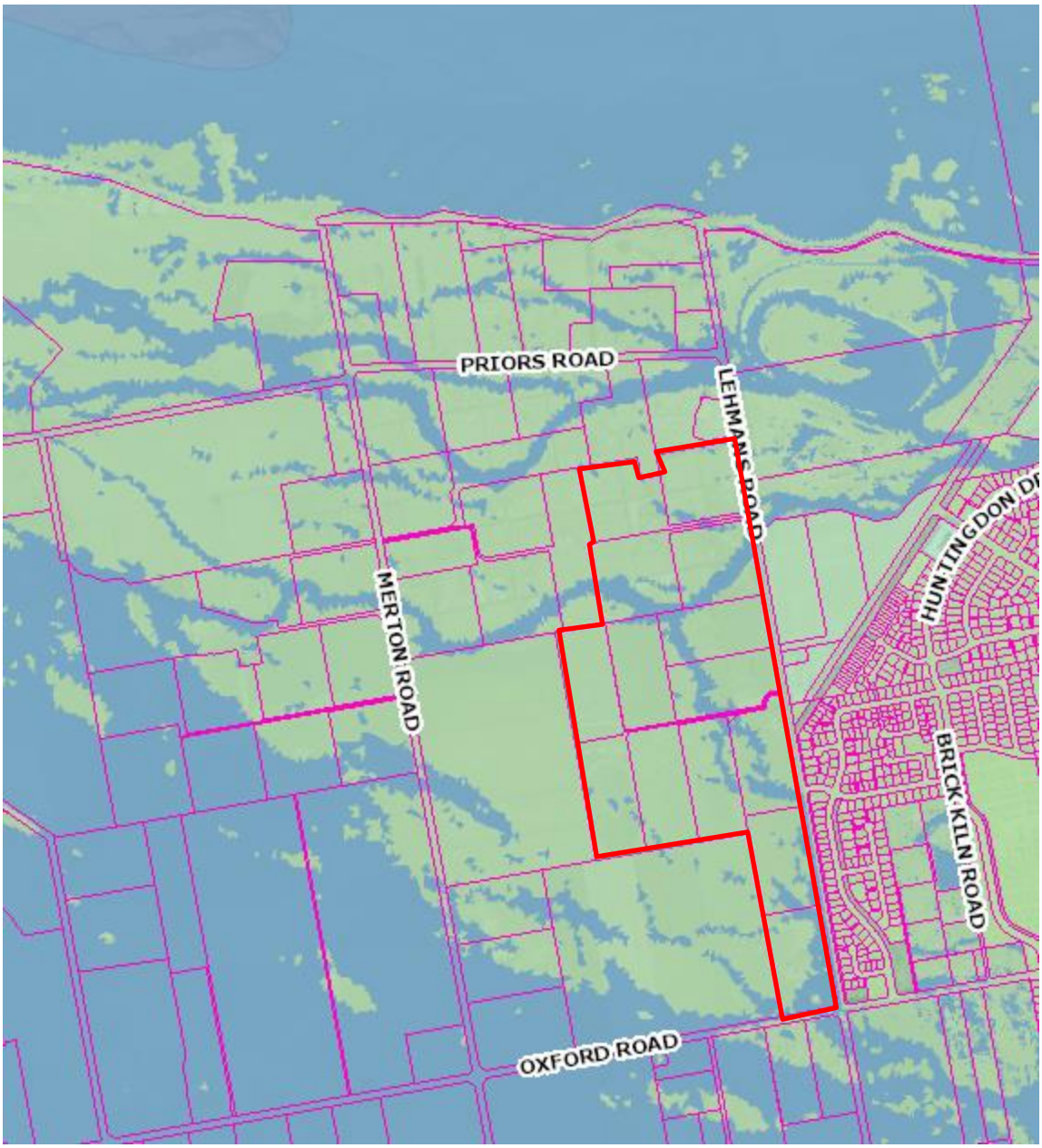


Figure 6: Rangiora Airfield Take-off and Approach vectors (blue dashed lines); Liquefaction damage unlikely (green)Transmission lines (green lines); Site outlined in red


PRIORS ROAD
LEHMANS ROAD
MERTON ROAD
HUNTINGDON DR
BRICK KILN ROAD
OXFORD ROAD

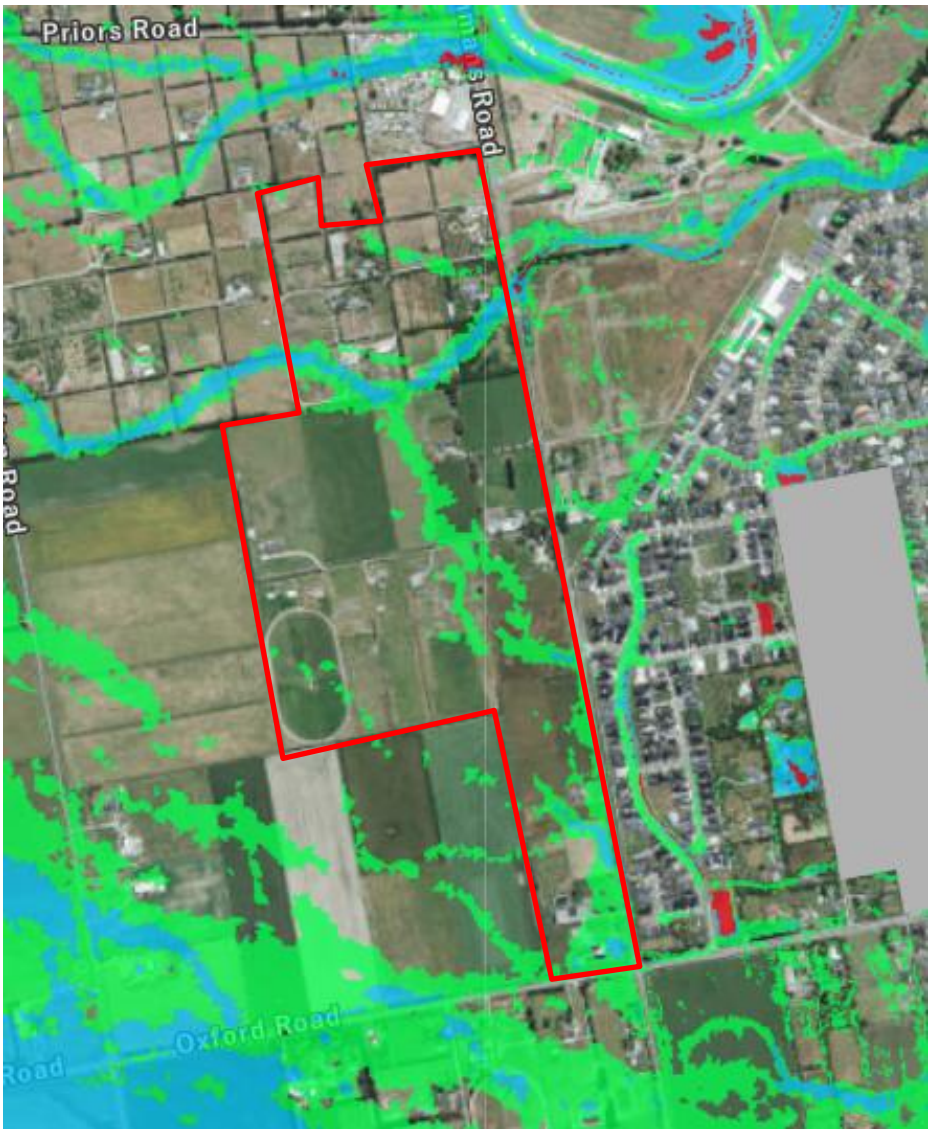


Figure 7: Non-urban flood assessment & Waimakariri Flood Hazard maps
Blue – medium risk, green – low risk, white – very low

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 af fect 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.

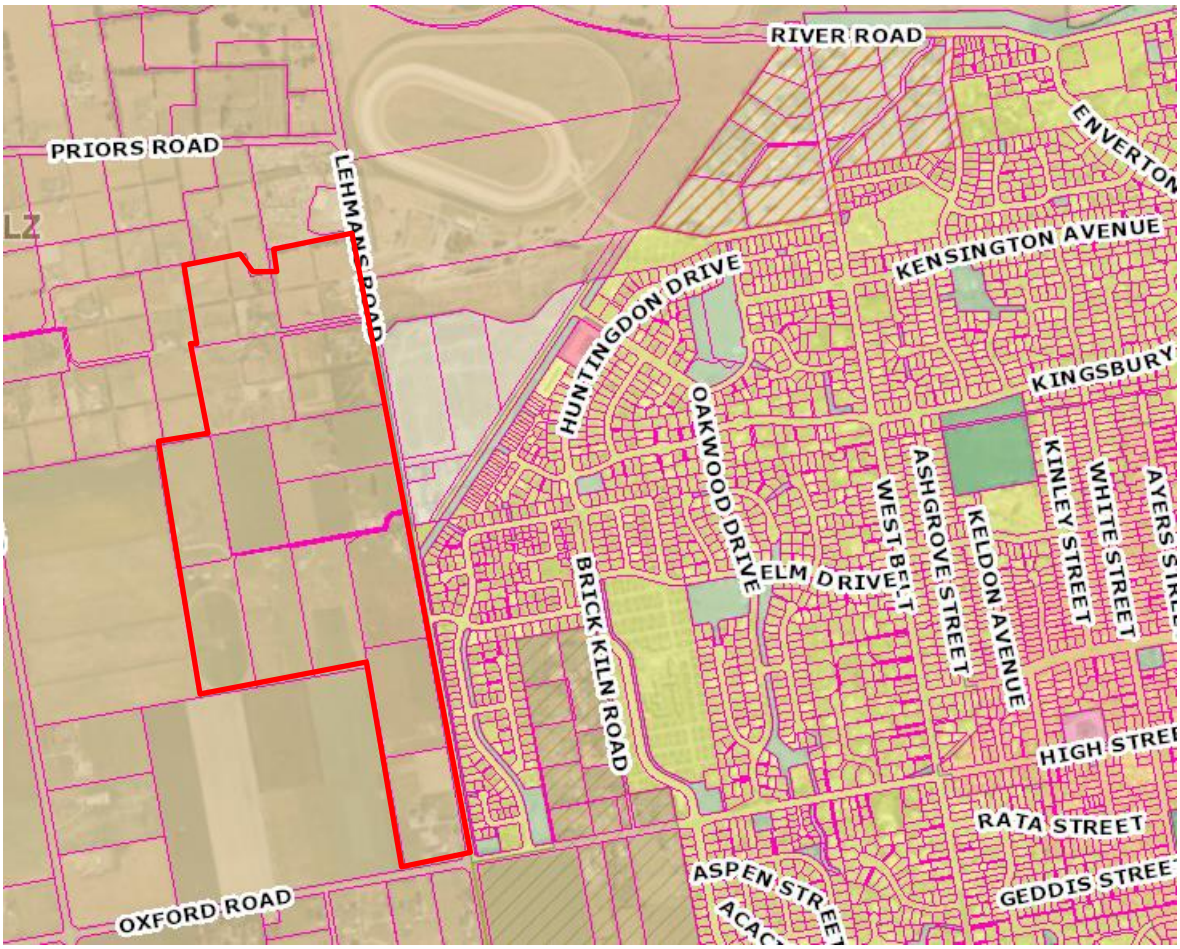


Figure 9: PWDP as notified – LLRZs shown in light grey. Diagonal stripes – urban growth overlay. Site outlined in red.

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).

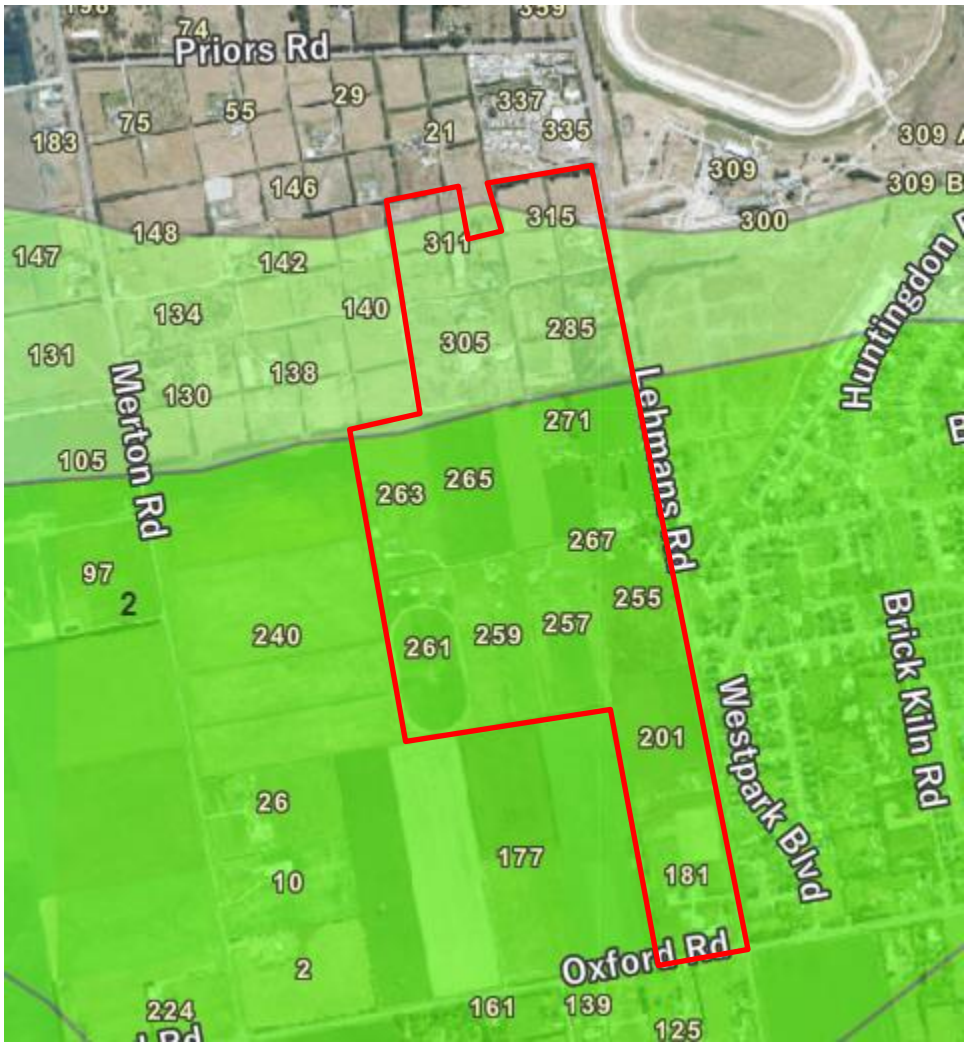


Figure 10: Site soils: Site outlined in red; (Canterbury Maps)

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 NPS-UD 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 re-zone 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	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

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	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 1500m^2. 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

[2] National Planning Standards p36
[3] RPS Introduction

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

	Development capacity to be enabled (number of dwellings)		
	Medium Term[1] (2018-2028)	Long Term[2] (2028-2048)	Total 30 Year Period (2018-2048)
Christchurch City	17,400	38,550	55,950
Selwyn	8,600	8,690	17,290
Waimakariri	6,300	7,060	13,360
Greater Christchurch	32,300	54,300	86,600

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

[4] Our Space Executive Summary

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 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 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 re-development;

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 D2).

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.

……

(Signature of applicant or person authorized to sign on behalf of the submitter)

Date: November 26, 2021

Figures:

Figure 1: The Site
Figure 2: The Site in a broader context
Figure 3: Fig 11 WDDS
Figure 4: Map A Chapter 6 CRPS
Figure 5: Proposed District Plan zoning
Figure 6: Overlays for Rangiora Airfield, liquefaction, transmission lines
Figure 7: Non-urban Flood Assessment & Waimakariri Flood Map
Figure 8: St Kilda Development
Figure 9: LLR Zones at Rangiora – notified PWDP
Figure 10: Soils LUC classes

Appendices:

Appendix 1: Assessment of CRPS

Appendix 2: Assessment of Proposed Plan

Appendix 3: Section 32 Assessment

Appendix 4: Submission on WDDS and WRRS

Appendix 5: Real estate advice

Appendix 6: LLUR (ECAN Listed Land Use Register) for Site

Appendix 1: Assessment of Regional Policy Statement Objectives and Policies

Lehmans Road Re-zone Submission

Note: Chapters not relevant

Chapter 7 - Fresh Water

Chapter 8 - The Coastal Environment

Chapter 10 - Beds of Rivers and Lakes and their Riparian Zones

Chapter 13 - Historic Heritage

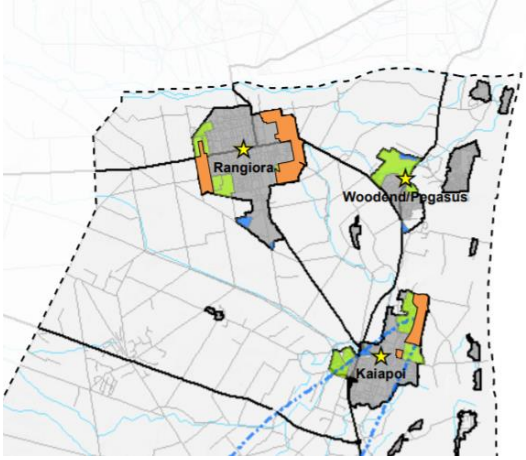
Chapter 14 - Air Quality

Chapter 16 - Energy

Chapter 18 - Hazardous Substances

Chapter 19 - Waste Minimisation and Management

Objective/Policy	Assessment
CHAPTER 5- LAND-USE AND INFRASTRUCTURE **5.2 OBJECTIVES** **5.2.1 Location, design and function of development (Entire Region)** Development is located and designed so that it functions in a way that: 1. achieves consolidated, well designed and sustainable growth in and around existing urban areas as the primary focus for accommodating the region's growth; and 2. enables people and communities, including future generations, to provide for their social, economic and cultural well-being and health and safety; and which: a. maintains, and where appropriate, enhances the overall quality of the natural environment of the Canterbury region, including its coastal environment, outstanding natural features and landscapes, and natural values; b. provides sufficient housing choice to meet the region's housing needs; c. encourages sustainable economic development by enabling business activities in appropriate locations; d. minimises energy use and/or improves energy efficiency; e. enables rural activities that support the rural environment including primary production; f. is compatible with, and will result in the continued safe, efficient and effective use of regionally significant infrastructure; g. avoids adverse effects on significant natural and physical resources including regionally	The Site is on the western edge of Rangiora. It will achieve consolidated, well designed and sustainable growth in and around the existing Rangiora urban area incluidng as a stand-alone development. It is a logical extension of a well-established township that has undergone significant planned and managed recent growth that is well designed and connected with the existing urban areas creating sustainable suburban communities. This proposed rezoning and associated provisions including an ODP for the Site will continue that approach. The proposal will enable the Greater Christchurch community to provide for their social, economic and cultural wellbeing through provision of additional housing as part of an established town. The development will serve a current demand and need, i.e. a short to medium term need that, once established, will form part of the housing stock and supply for the benefit of future generations. Rangiora presently has about four years vacant land supply (800 vacant lots and a 180 building consent/year take up). With respect to clause 2: 1. There are no areas within the land to be rezoned which have particular or significant natural values, noting the Rakahuri/Ashley is to the north, and there are major transmission

significant infrastructure, and where avoidance is impracticable, remedies or mitigates those effects on those resources and infrastructure; h. facilitates the establishment of papakāinga and marae; and i. avoids conflicts between incompatible activities	lines (significant regional infrastructure) adjacent to the Site. 2. The area being rezoned has as its primary purpose the provision of a specific but uncatered for housing choice for people and communities. 3. The rezoned land is conveniently located to the centre of Rangiora and local facilities and amenities such as Arlington Park, the Racecourse and Rangiora Airfield. 4. The land being rezoned is currently used for limited primary production and lifestyle purposes 5. There is no prospect of conflicts between incompatible uses as the Site adjoins urban land used residentially on its eastern side across Lehmans Road and RLZ land to the north and west.
5.3.7 Strategic land transport network and arterial roads (Entire Region) In relation to strategic land transport network and arterial roads, the avoidance of development which: 1. adversely affects the safe efficient and effective functioning of this network and these roads, including the ability of this infrastructure to support freight and passenger transport services; and 2. in relation to the strategic land transport network and arterial roads, to avoid development which forecloses the opportunity for the development of this network and these roads to meet future strategic transport requirements	An Integrated Traffic Assessment that evaluates the effects of the proposed residential development on the existing roading network will accompany the subdivision consent. The road environment and frontages adjoining the Site are changing from rural to peri-urban. The traffic effect of the proposed development on a collector road and the linking strategic road is considered to be less than minor and is not of a scale with regional significance. The rezoning will be consistent with Objective 5.3.7.
RECOVERY AND REBUILDING OF GREATER CHRISTCHURCH ***6.2 OBJECTIVES*** ***6.2.1 Recovery framework*** *Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that:* *1. identifies priority areas for urban development within Greater Christchurch;* *2. identifies Key Activity Centres which provide a focus for high quality, and, where appropriate, mixed-use development that incorporates the principles of good urban design;* *3. avoids urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS;* *4. protects outstanding natural features and landscapes including those within the Port Hills from inappropriate subdivision, use and development;*	This Objective is largely given effect to by Map A (reproduced below) of Chapter 6 RPS and Policy 6.3.1. as amended by Change 1 to the CRPS. The Site is not within a new FDA and so is inconsistent with this policy in regard to Map A.  The environmental effects assessment included with the PWDP submission establish that the proposed development is consistent and will not

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*	give rise to any concerns with respect to all the matters listed in 4. to 11.
6.2.2 Urban form and settlement pattern *The urban form and settlement pattern in Greater Christchurch is managed to provide sufficient land for rebuilding and recovery needs and set a foundation for future growth, with an urban form that achieves consolidation and intensification of urban areas, and avoids unplanned expansion of urban areas, by:* 1. *aiming to achieve the following targets for intensification as a proportion of overall growth through the period of recovery:* a. *35% averaged over the period between 2013 and 2016* b. *45% averaged over the period between 2016 to 2021* c. *55% averaged over the period between 2022 and 2028;* 2. *providing higher density living environments including mixed use developments and a greater range of housing types, particularly in and around the Central City, in and around Key Activity Centres, and larger neighbourhood centres, and in greenfield priority areas and brownfield sites;* 3. *reinforcing the role of the Christchurch central business district within the Greater Christchurch area as identified in the Christchurch Central Recovery Plan;* 4. *providing for the development of greenfield priority areas on the periphery of Christchurch's urban area, and surrounding towns at a rate and in locations that meet*	The Site forms a logical extension to Rangiora and will provide a compact and consolidated urban form for the town, as it lines out along Lehmans Road linking the newly developing residential land to the east of the Site to extend the existing urban area. The PWDP identifies four development areas to cater for known and future urban growth (these are Map A FDA areas) so to that extent the Site is not planned and is consistent with the Policy intent of the NPS-UD. Additional capacity to match the needs for housing over the 10 year life of the District Plan will provide a necessary foundation to enable future growth. The Lehmans Road proposal will better enable the intent of subclause 5 of the Policy in encouraging sustainable and self-sufficient growth of Rangiora. Rangiora has about four years of vacant land available at current land take up rates. The development and will contribute to a greater range of housing types at Rangiora. Infrastructure capacity to service the proposal at urban residential standards is anticipated given it is adjoining the Projected Infrastructure Boundary.

anticipated demand and enables the efficient provision and use of network infrastructure; 5. *encouraging sustainable and self-sufficient growth of the towns of Rangiora, Kaiapoi, Woodend, Lincoln, Rangiora and Prebbleton and consolidation of the existing settlement of West Melton;* 6. *N/A Rural Residential* 7. *N/A Maori Reserves*	
6.2.3 Sustainability *Recovery and rebuilding is undertaken in Greater Christchurch that:* 1. *provides for quality living environments incorporating good urban design;* 2. *retains identified areas of special amenity and historic heritage value;* 3. *retains values of importance to Tāngata Whenua;* 4. *provides a range of densities and uses; and* 5. *is healthy, environmentally sustainable, functionally efficient, and prosperous.*	The proposal will be underpinned by good design reflected in and managed by an ODP to create quality living environments that will be functionally efficient with linkage and road access in to the existing and possible future urban fabric of Rangiora.
6.2.4 Integration of transport infrastructure and land use *Prioritise the planning of transport infrastructure so that it maximises integration with the priority areas and new settlement patterns and facilitates the movement of people and goods and provision of services in Greater Christchurch, while:* 1. *managing network congestion;* 2. *reducing dependency on private motor vehicles;* 3. *reducing emission of contaminants to air and energy use;* 4. *promoting the use of active and public transport modes;* 5. *optimising use of existing capacity within the network; and* 6. *enhancing transport safety.*	The Integrated Traffic Assessment to be provided at subdivision stage will demonstrate that the Site has been designed to satisfy the requirements of this Policy and this is confirmed by the urban structural elements on the ODP.
6.3 POLICIES ***6.3.1 Development within the Greater Christchurch area*** *In relation to recovery and rebuilding for Greater Christchurch:*	Map A was prepared to provide a focus for priority development as part of the earthquake recovery phase. That is now past.

1. *give effect to the urban form identified in Map A, which identifies the location and extent of urban development that will support recovery, rebuilding and planning for future growth and infrastructure delivery;* 2. *give effect to the urban form identified in Map A (page 6-27) by identifying the location and extent of the indicated Key Activity Centres;* 3. *enable development of existing urban areas and greenfield priority areas, including intensification in appropriate locations, where it supports the recovery of Greater Christchurch;* 4. *ensure new urban activities only occur within existing urban areas or identified greenfield priority areas as shown on Map A, unless they are otherwise expressly provided for in the CRPS;* 5. *N/A educational facilities in rural areas* 6. *N/A metropolitan recreation facility and* 7. *avoid development that adversely affects the function and viability of, or public investment in, the Central City and Key Activity Centres.*	The Submission site is not within the current version of Map A as amended by Change 1 to the CRPS. It is quite moot as to the priority areas needed to meet present and foreseeable future housing demand in general in Greater Christchurch, and in Rangiora. UFD-O1 of the PWDP sets out the feasible development capacity for the short, medium and long term. Four development areas have been identified in the PWDP to provide for this capacity but they are not re-zoned in the PWDP; there is still either a certification process to be negotiated, or a plan change two years after the District Plan is operative, or consent processes for the alnd to be released for development. No other development options are identified. The Site is not in a random, remote greenfields location that would challenge the integrity and consistency of the present RPS policy of favouring outward growth around existing urban areas. The growth enabled by the proposal contributes to compact and consolidated urban forms, and where appropriate connectivity to existing areas can be developed.
6.3.2 Development form and urban design *Business development, residential development (including rural residential development) and the establishment of public space is to give effect to the principles of good urban design below, and those of the NZ Urban Design Protocol 2005, to the extent appropriate to the context:* 1. *Tūrangawaewae – the sense of place and belonging – recognition and incorporation of the identity of the place, the context and the core elements that comprise the Through context and site analysis, the following elements should be used to reflect the appropriateness of the development to its location: landmarks and features, historic heritage, the character and quality of the existing built and natural environment, historic and cultural markers and local stories.* 2. *Integration – recognition of the need for well-integrated places, infrastructure, movement routes and networks, spaces, land uses and the natural and built environment. These elements should be overlaid to provide an appropriate form and pattern of use and development.*	Good urban design underpins the development concept in the ODP. The assessment of environmental effects concludes that the Site to be rezoned will achieve a high level of amenity and efficiency for residents and for the neighbourhood. The submission is consistent with, and will give effect to, the outcomes sought by this Policy.

3. *Connectivity – the provision of efficient and safe high quality, barrier free, multimodal connections within a development, to surrounding areas, and to local facilities and services, with emphasis at a local level placed on walking, cycling and public transport as more sustainable forms of* 4. *Safety – recognition and incorporation of Crime Prevention Through Environmental Design (CPTED) principles in the layout and design of developments, networks and spaces to ensure safe, comfortable and attractive places.* 5. *Choice and diversity – ensuring developments provide choice and diversity in their layout, built form, land use housing type and density, to adapt to the changing needs and circumstances of the population.* 6. *Environmentally sustainable design – ensuring that the process of design and development minimises water and resource use, restores ecosystems, safeguards mauri and maximises passive solar gain.* 7. *Creativity and innovation – supporting opportunities for exemplar approaches to infrastructure and urban form to lift the benchmark in the development of new urban areas in the Christchurch region.*	
6.3.3 Development in accordance with Outline Development Plans *Development in greenfield priority areas and rural residential development is to occur in accordance with the provisions set out in an outline development plan or other rules for the area. Subdivision must not proceed ahead of the incorporation of an outline development plan in a district plan. Outline development plans and associated rules will: (list of specific matters)*	The development will be managed through an ODP. The proposal is consistent with, and will give effect to, the outcomes sought by this Policy.
6.3.4 Transport effectiveness *Ensure that an efficient and effective transport network that supports business and residential recovery is restored, protected and enhanced so that it maintains and improves movement of people and goods around Greater Christchurch by:* 1. *avoiding development that will overload strategic freight routes;* 2. *providing patterns of development that optimise use of existing network capacity and ensuring that, where possible, new building projects support increased uptake of active*	The ODP will confirm how the Site will knit in to the existing arterial and local roading network and the possible future growth to the north of the Site. Lehmans Road and Rangiora-Oxford Road provide direct connection to the town centre where connections to the public bus services are possible. The proposed rezoning is consistent with, and will give effect to, the outcomes sought by this Policy.

and public transport, and provide opportunities for modal choice; *3. providing opportunities for travel demand management;* *4. requiring integrated transport assessment for substantial developments; and* 5. *improving road user safety.*	
6.3.5 Integration of land use and infrastructure *Recovery of Greater Christchurch is to be assisted by the integration of land use development with infrastructure by:* *1. Identifying priority areas for development to enable reliable forward planning for infrastructure development and delivery;* *2. Ensuring that the nature, timing and sequencing of new development are co-ordinated with the development, funding, implementation and operation of transport and other infrastructure in order to:* *a. optimise the efficient and affordable provision of both the development and the infrastructure;* *b. maintain or enhance the operational effectiveness, viability and safety of existing and planned infrastructure;* *c. protect investment in existing and planned infrastructure; and* *d. ensure new development does not occur until provision for appropriate infrastructure is in place;* *3. Providing that the efficient and effective functioning of infrastructure, including transport corridors, is maintained, and the ability to maintain and upgrade that infrastructure is retained;* *4. Only providing for new development that does not affect the efficient operation, use, development, appropriate upgrading and safety of existing strategic infrastructure, including by avoiding noise sensitive activities within the 50dBA Ldn airport noise contour for Christchurch International Airport, unless the activity is within an existing residentially zoned urban area, residential greenfield area identified for Kaiapoi, or residential greenfield priority area identified in Map A (page 6-28); and* 5. *Managing the effects of land use activities on infrastructure, including avoiding activities that have the potential to limit the efficient and effective, provision, operation,*	The factors and outcomes sought in Policy 6.3.5 have formed the basis for identification of growth areas with Greater Christchurch as reflected in Map A and the setting of the infrastructure boundary. The servicing of the proposed development area is anticipated to be feasible. The proposed areas will make efficient use of existing infrastructure as it sits at the top of the catchment. The proposal gives effect to this Policy.

maintenance or upgrade of strategic infrastructure and freight hubs.	
6.3.7 Residential location, yield and intensification 1. *In relation to residential development opportunities in Greater Christchurch:* 2. *Subject to Policy 5.3.4, residential greenfield priority area development shall occur in accordance with Map A. These areas are sufficient for both growth and residential relocation through to 2028.* 3. *Intensification in urban areas of Greater Christchurch is to be focused around the Central City, Key Activity Centres and neighbourhood centres commensurate with their scale and function, core public transport routes, mixed-use areas, and on suitable brownfield land.* 4. *Intensification developments and development in greenfield priority areas shall achieve at least the following residential net densities averaged over the whole of an ODP area (except where subject to an existing operative ODP with specific density provisions):* 5. *10 household units per hectare in greenfield areas in Selwyn and Waimakariri District;* 6. *15 household units per hectare in greenfield areas in Christchurch City;* 7. *Intensification development within Christchurch City to achieve an average of:* 8. *50 household units per hectare for intensification development within the Central City;* 9. *30 household units per hectare for intensification development elsewhere.* 10. *Provision will be made in district plans for comprehensive development across multiple or amalgamated sites.* 11. *Housing affordability is to be addressed by providing sufficient intensification and greenfield priority area land to meet housing demand during the recovery period, enabling brownfield development and providing for a range of lot sizes, densities and appropriate development controls that support more intensive developments such as mixed use developments, apartments, townhouses and terraced housing.*	See assessment for Policy 6.3.1. The FDAs identified on Map A were developed on the primary basis of anticipated demand created by the recovery and rebuilding process following the Canterbury earthquakes. While these were stated to apply through to 2028, recent analysis of population growth and take-up of land for new housing has shown that the growth requirements were underestimated and land availability overestimated. This was addressed in the update to the Urban Development Strategy which is contained in the report "Our Space 2018-2018 – Greater Christchurch Settlement Pattern Update" and reflected in Change 1 to the CRPS which amended Map A to provide FDAs in Rangiora. The objectives and policies of Chapter 6 RPS do not recognise that housing needs of Greater Christchurch have moved on from responding to the impacts of the earthquakes. In particular there is a demand for residential land for housing created primarily now by natural growth in the population, particularly for those people buying their first home or seeking to re-settle in Greater Christchurch generally. Planning for this demand can be by way of changes to, and review of, the RPS and District Plans or legitimately by way of Private Plan changes and submissions on the Proposed District Plan. Private initiatives provide opportunities for planning responses to provide timely planning interventions to help meet the changed circumstances driving demand for urban and housing.
6.3.9 **Rural residential development**	The Site was not included as a preferred LLRZ site in the Waimakariri RRS. The Councils strategic

In Greater Christchurch, rural residential development further to areas already zoned in district plans as at 1st January 2013 can only be provided for by territorial authorities in accordance with an adopted rural residential development strategy prepared in accordance with the Local Government Act 2002, subject to the following: 1. In the case of Christchurch City, no further rural residential development is to be provided for within the Christchurch City Plan area; 2. The location must be outside the greenfield priority areas for development and existing urban areas; 3. All subdivision and development must be located so that it can be economically provided with a reticulated sewer and water supply integrated with a publicly owned system, and appropriate stormwater treatment and disposal; 4. Legal and physical access is provided to a sealed road, but not directly to a road defined in the relevant district plan as a Strategic or Arterial Road, or as a State highway under the Government Roading Powers Act 1989; 5. The location and design of any proposed rural residential development shall: a. avoid noise sensitive activities occurring within the 50 dBA Ldn air noise contour surrounding Christchurch International Airport so as not to compromise the future efficient operation of Christchurch International Airport or the health, well-being and amenity of people; b. avoid the groundwater protection zone for Christchurch City's drinking water; c. avoid land between the primary and secondary stop banks south of the Waimakariri River; d. avoid land required to protect the landscape character of the Port Hills; e. not compromise the operational capacity of the Burnham Military Camp, West Melton Military Training Area or Rangiora Airfield; f. support existing or upgraded community infrastructure and provide for good access to emergency services; g. avoid significant reverse sensitivity effects with adjacent rural activities, including quarrying and agricultural research farms, or strategic infrastructure; h. avoid significant natural hazard areas including steep or unstable land;	decision was to not place LLRZ adjacent to its main towns to leave the way open for more intensive urban development in the longer-term. LLRZ zones were seen to fetter the choices available to the Council for sustainable and orderly urban growth, The Site is outside the greenfield priority areas and does not compete with identified locations for development set aside to provide development capacity for urban housing. The site adjoins urban Rangiora so to that extent is capable of being serviced form reticulated systems. The ground conditions would support stormwater discharge to ground. Legal and physical access is provided by three collector roads. The Site does not have frontage nor require direct access off Rangiora-Oxford Road which is an arterial road/ State Highway. The Site 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 god 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. Consistent with the Policy criteria 1-5 but not identified in a RRS strategic document; and proposing a higher density than 'rural residential'

i. avoid significant adverse ecological effects, and support the protection and enhancement of ecological values; j. support the protection and enhancement of ancestral land, water sites, wāhi tapu and wāhi taonga of Ngāi Tahu; k. where adjacent to or in close proximity to an existing urban or rural residential area, be able to be integrated into or consolidated with the existing settlement; and l. avoid adverse effects on existing surface water quality. 6. An outline development plan is prepared which sets out an integrated design for subdivision and land use, and provides for the long-term maintenance of rural residential character. 7. A rural residential development area shall not be regarded as in transition to full urban development.	defined in the CRSP definition as averaging 1-2 households per ha
CHAPTER 9- ECOSYSTEMS AND INDIGENOUS BIODIVERSITY **9.2 Objectives** **9.2.1 Halting the decline of Canterbury's ecosystems and indigenous biodiversity** The decline in the quality and quantity of Canterbury's ecosystems and indigenous biodiversity is halted and their life supporting capacity and mauri safeguarded	There is no indigenous biodiversity of any particular value on the Site proposed to be rezoned.
CHAPTER 11- NATURAL HAZARDS **1.2 Objectives** **11.2.1 Avoid new subdivision, use and development of land that increases risks associated with natural hazards** New subdivision, use and development of land which increases the risk of natural hazards to people, property and infrastructure is avoided or, where avoidance is not possible, mitigation measures minimise such risks.	Parts of the Site (potential flood channels) are within the Non-urban Flood Management Area. All dwellings will have an appropriate floor level determined by a flood assessment certification process at subdivision stage. The Site is not identified in the PWDP as subject to any other hazard such as faults or liquefaction.
CHAPTER 12- LANDSCAPE **2.2 OBJECTIVES** **12.2.1 Identification and protection of outstanding natural features and landscapes** Outstanding natural features and landscapes within the Canterbury region are identified and their values are specifically recognised and protected from inappropriate subdivision, use, and development. **12.2.2 Identification and management of other landscapes** The identification and management of other important landscapes that are not outstanding natural landscapes. Other important landscapes may include:	There are no outstanding natural landscapes or features or other amenity landscapes that could be impacted by development of the Site.

1. natural character 2. amenity 3. historic and cultural heritage	
CHAPTER 15- **SOILS 15.2** **OBJECTIVES 15.2.1 Maintenance of soil quality** Maintenance and improvement of the quality of Canterbury's soil to safeguard their mauri, their life supporting capacity, their health and their productive capacity**.** **15.3 POLICIES** **15.3.1 Avoid remedy or mitigate soil degradation** In relation to soil: 1. to ensure that land-uses and land management practices avoid significant long-term adverse effects on soil quality, and to remedy or mitigate significant soil degradation where it has occurred, or is occurring; and 2. to promote land-use practices that maintain and improve soil quality. **15.3.2 Avoid and remedy significant induced soil erosion** To avoid significant new induced soil erosion resulting from the use of land and as far as practicable remedy or mitigate significant induced soil erosion where it has occurred. Particular focus is to be given to the desirability of maintaining vegetative cover on non-arable land.	This objective and its policies relate to the quality of soil and potential impacts on this quality by land management practices associated with activities such as intensive farming. It is not therefore relevant to the proposed rezoning for urban and residential purposes. The Site contains Class 2 and 3 soils.
CHAPTER 17- CONTAMINATED LAND **17.2 OBJECTIVES** **17.2.1 Protection from adverse effects of contaminated land** Protection of people and the environment from both on-site and off-site adverse effects of contaminated land. **7.3 POLICIES** **17.3.1 Identify potentially contaminated land** To seek to identify all land in the region that was historically, or is presently, being used for an activity that has, or could have, resulted in the contamination of that land, and where appropriate, verify the existence and nature of contamination. **17.3.2 Development of, or discharge from contaminated land** In relation to actually or potentially contaminated land, where new subdivision, use or development is proposed on that land, or where there is a discharge of the contaminant from that land: 1. a site investigation is to be undertaken to determine the nature and extent of any contamination; and 2. if it is found that the land is contaminated, except as provided for in Policy 17.3.3, the actual	A Preliminary Site Investigation will accompany any subdivision consent which will comply with PWDP Objective CL-O1 for contaminated land and its supporting policies P1 – P4. The proposal therefore satisfies this objective and policies.

or potential adverse effects of that contamination, or discharges from the contaminated land shall be avoided, remedied or mitigated in a manner that does not lead to further significant adverse effects.	

Appendix 2: Assessment of Proposed Waimakariri District Plan Objectives and Policies

Lehmans Road Re-zone Submission

Objective/Policy	Assessment
SD-O2 Urban development Urban development and infrastructure that: 1. is consolidated and integrated with the urban environment; 2. that recognises existing character, amenity values, and is attractive and functional to residents, businesses and visitors; 3. utilises the District Council's reticulated wastewater system, and potable water supply and stormwater infrastructure where available; 4. provides a range of housing opportunities, focusing new residential activity within existing towns, and identified development areas in Rangiora and Kaiapoi, in order to achieve the housing bottom lines in UFD-O1; 5. supports a hierarchy of urban centres, with the District's main centres in Rangiora, Kaiapoi, Oxford and Woodend being: a. the primary centres for community facilities; b. the primary focus for retail, office and other commercial activity; and c. the focus around which residential development and intensification can occur. 6. provides opportunities for business activities to establish and prosper within a network of business and industrial areas zoned appropriate to their type and scale of activity and which support district self-sufficiency;	The Site is on the western edge of Rangiora, and provides a compact form to the town and responds to the on-going demand for houses and building lots in Rangiora. It can be integrated to the urban environment including through the West Rangiora Development Area (DEV-WR) plan which is an identified development area in the PWDP. The proposal is intended to connect to full urban reticulation for three waters. Rangiora's role as the District's main town centre will continue as it is planned to be several scales larger in size and function than Kaiapoi, Oxford and Pegasus. The Site is near to the Rangiora Airfield, The Rangiora Racecourse and Arlington Park. As a LLRZ proposal it is inconsistent with SD-O2.9 as it is not in a PWDP identified area. The proposal is generally consistent with the Objective.

7. provides people with access to a network of spaces within urban environments for open space and recreation; 8. supports the transition of the Special Purpose Zone (Kāinga Nohoanga) to a unique mixture of urban and rural activities reflecting the aspirations of Te Ngāi Tūāhuriri Rūnanga; 9. provides limited opportunities for Large Lot Residential development in identified areas, subject to adequate infrastructure; and 10. recognise and support Ngāi Tūāhuriri cultural values through the protection of sites and areas of significance to Māori identified in SASM-SCHED1.	
SD-O3 Energy and infrastructure Across the District: 1. improved accessibility and multi-modal connectivity is provided through a safe and efficient transport network that is able to respond to technology changes and contributes to the well-being and liveability of people and communities; 2. infrastructure, including strategic infrastructure, critical infrastructure and regionally significant infrastructure: a. is able to operate efficiently and effectively; and b. is enabled, while: i. managing adverse effects on the surrounding environment, having regard to the social, cultural and economic benefit, functional need and operational need of the infrastructure; and	The Site is well positioned in relation to network roading and cycling/ walking options. Objectives 3 and 4 will be addressed at subdivision stage. The proposal helps achieve the Objective.

ii. managing the adverse effects of other activities on infrastructure, including managing reverse sensitivity; 3. the nature, timing and sequencing of new development and new infrastructure is integrated and coordinated; and 4. encourage more environmentally sustainable outcomes as part of subdivision and development, including though the use of energy efficient buildings, green infrastructure and renewable electricity generation.	
SD-O4 Rural land Outside of identified residential development areas and the Special Purpose Zone (Kāinga Nohoanga), rural land is managed to ensure that it remains available for productive rural activities by: 1. providing for rural production activities, activities that directly support rural production activities and activities reliant on the natural resources of Rural Zones and limit other activities; and 2. ensuring that within rural areas the establishment and operation of rural production activities are not limited by new incompatible sensitive activities.	N/A Rural lifestyle zoned land.
SD-O5 Ngāi Tahu mana whenua/Te Ngāi Tūāhuriri Rūnanga Te Ngāi Tūāhuriri Rūnanga's role in the management of natural and physical resources is recognised, so that: 1. Ngāi Tūāhuriri's historic and contemporary connections, and cultural and spiritual values, associated with the land, water and other taonga are recognised and provided for; 2. the values of identified sites and areas of significance to Ngāi Tūāhuriri are protected;	Ngai Tūāhuriri's interest in and association with the Rakahuri/Ashley is noted. No other SASM is identified in the Site. Consistent with the Objective.

3. Ngāi Tūāhuriri can retain, and enhance access to sites of cultural significance; 4. Māori land is able to be occupied and used by Ngāi Tūāhuriri for its intended purposes and to maintain their relationship with their ancestral land; 5. recognised customary rights are protected; 6. Ngāi Tūāhuriri are able to carry out customary activities in accordance with tikanga; and 7. Te Ngāi Tūāhuriri Rūnanga are able to actively participate in decision-making and exercise kaitiakitanga.	
SD-O6 Natural hazards and resilience The District responds to natural hazard risk, including increased risk as a result of climate change, through: 1. avoiding subdivision, use and development where the risk is unacceptable; and 2. mitigating other natural hazard risks.	The Site is mapped as part of a Non-urban Flood Assessment Area, and there are no areas of high flood risk hazard in the Site. Usual subdivision designs are to construct preferential flood flow paths through the Site based on the road network with detailed design at the subdivision stage. The risks of natural hazards to people, property and infrastructure are appropriately mitigated by compliance with PWDP rules about floor heights. Climate Change effects are unlikely at an inland site that is remote from the coast but a major river the Rakahuri/Ashley lies to the north of the Site. The proposal is consistent with the Policy.
UFD-O1 Feasible development capacity for residential activities Sufficient feasible development capacity for residential activity to meet specified housing bottom lines and a changing demographic profile of the District as follows: Term Short to Medium Term	The proposal contributes to ensuring there is sufficient feasible development capacity for residential activity to meet specified housing bottom lines in the short and medium term. Rangiora has about four years vacant land supply left (800 lots) at the building consent rate of about 180 consents/year. Plan enabled development land will become scarce in the short term.

	(2018-2028)	(2028-2048)	(2018-2048)
Housing Bottom Lines (Development Capacity)	6,300 Residential Units	7,100 Residential Units	13,400 Residential Units
UFD-P3 **Identification/location and extension of Large Lot Residential Zone areas** In relation to the identification/location of Large Lot Residential Zone areas: 1. new Large Lot Residential development is located in the Future Large Lot Residential Zone Overlay which adjoins an existing Large Lot Residential Zone as identified in the RRDS and is Informedthrough the development of an ODP; 2. new Large Lot Residential development, other than addressed by (1) above, is located so that it: a. occurs in a form that is attached to an existing Large Lot Residential Zone or Small SettlementZone and promotes a coordinated pattern of development; b. is not located within an identified Development Area of the District's main towns of Rangiora,Kaiapoi and Woodend identified in the Future Development Strategy; c. is not on the direct edges of the District's main towns of Rangiora, Kaiapoi and Woodend, noron the direct edges of these towns' identified new development areas as identified in the Future Development Strategy; d. occurs in a manner that makes use of existing and planned transport infrastructure and thewastewater system, or where such infrastructure is not available, upgrades, funds and builds infrastructure as required, to an acceptable standard; and e. is informed through the development of an ODP.	Consistent with the Objective.	The Site adjoins an existing LLRZ zone (east side of Lehmans Road) but it is understood that a submission will be lodged seeking GRZ for this adjoining LLRZ. An ODP will prepared at the appropriate time. It is not in an identified FDA identified in the WWDS 2018. The Site is directly on the edge of a main town, An amendment to UFD-P3 is sought through this submission to enable LLRZ D2 areas to locate in township edge locations. An assessment of services and infrastructure capacity will determine feasibility of connecting to existing Council systems. The proposal is not consistent with and will not achieve the location criteria of Policy but can meet other policy elements..	

EI-O1 Provision of energy and infrastructure Across the District: 1. efficient, effective, resilient, safe and sustainable energy and infrastructure, including critical infrastructure, strategic infrastructure and regionally significant infrastructure, is developed and maintained to benefit the social, economic, cultural and environmental well-being of the District, including in response to future needs such as increased sustainability, and changing techniques and technology; 2. there is increased renewable energy for national, regional and local use; and 3. there is greater renewable electricity generation, including small scale or community scale renewable electricity generation, with generation surplus able to be supplied to the electricity distribution network.	For consideration at subdivision and engineering design stage.
EI-O2 Adverse effects of energy and infrastructure Adverse effects of energy and infrastructure on the qualities and characteristics of surrounding environments and community well-being are avoided, remedied or mitigated.	High Transmission lines cross part of the Site. To be addressed at ODP and subdivision stage through PWDP Rules.
EI-P1 Recognising the benefits of, and providing for, energy and infrastructure Recognise the local, regional or national benefits of energy and infrastructure through: 5. providing for the effective, reliable and future-proofed communication networks and services;	The proposal is for a quality high density LLRZ development with full reticulation as required by conditions of subdivision consent and to the applicable Council Engineering Standards including provision for firefighting. Complies with the Policy.

6. providing for the effective, resilient, efficient and safe water supply, wastewater system and stormwater infrastructure; and community scale irrigation/stockwater; 10. the provision of an adequate supply of water for firefighting in accordance with SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice.	
EI-P2 Availability, provision and adequacy of, and connection to, energy and infrastructure Across the District: 1. to benefit the social, economic, cultural and environmental well-being of the District: a. ensure land use and development is coordinated with, and to the extent considered reasonably practicable, connected to and adequately serviced by energy and infrastructure, if available, including electricity, water supply, wastewater system and stormwater infrastructure; and b. ensure that connectivity to communications infrastructure can be achieved; and 2. where a public reticulated water supply or wastewater system is not available, adequate on site systems shall be installed consistent with maintaining public health and avoiding or mitigating adverse effects on the environment, while discouraging small scale stand alone systems.	As above Complies with the Policy.
CL-O1 Contaminated land	The Site has been used for a long time for low intensity rural and lifestyle land uses. The likelihood of areas of contaminated land is

The subdivision, use and development of contaminated land does not adversely affect people, property, and the environment.	considered to be low but will be investigated as a PSI exercise for evidence to any hearing, or at subdivision stage. Consistent with the Policy.
CL-P1 Identify contaminated sites Identify sites potentially containing contaminated land, including sites with contamination from current and historical land uses and activities, by using the Regional Council's LLUR and coordinating with the Regional Council in the recording and management of contaminated land.	An enquiry of the ECAN LLUR record has been made. There are two potential areas of contamination at the northern end of the Site (previous clay target shooting and bulk pesticide storage) which can be addressed at subdivision stage. Complies with the Policy.
CL-P2 Best practice management of contaminated land Require applications for subdivision, use or development of contaminated land, or potentially contaminated land, to include an investigation of the risks and to remediate the contamination, or manage activities on contaminated land, to protect the health of people and the environment. The remediation or mitigation works for contaminated land shall be undertaken in such a way to not pose further risk to human health or the environment than if remediation had not occurred.	Areas of contaminated land will be investigated as a PSI exercise for evidence to any hearing, or at subdivision stage. Complies with the Policy.
NH-O1 Risk from natural hazards New subdivision, land use and development: 1. manages natural hazard risk, including coastal hazards, in the existing urban environment to ensure that any increased risk to people and property is low; 2. is avoided in the Ashley Fault Avoidance Overlay and high hazard areas for flooding outside of the urban environment where the risk to life and property are unacceptable; and	The Site is within the Non-Urban Flood Assessment Area. The PWDP adopts a new approach based on a flood assessment certificate process. That process will determine the risk of flooding and recommend minimum floor heights for any new development. Specific consideration of the flood risk will be undertaken at subdivision stage and either a certificate issued confirming compliance with the relevant rule or a resource consent obtained. Complies with the Policy.

3. outside of the urban environment, is undertaken to ensure natural hazard risk, including coastal hazard risk, to people and property is avoided or mitigated and the ability of communities to recover from natural hazard events is not reduced.	
NH-P3 Activities in high hazard areas for flooding outside of urban areas Avoid subdivision, use and development for natural hazard sensitive activities outside urban environments in high flood hazard and high coastal flood hazard urban environments unless: 1. the activity incorporates mitigation measures so that the risk to life, and building damage is low; 2. the risk from flooding to surrounding properties is not significantly increased; 3. the conveyance of flood waters is not impeded; and 4. the activity does not require new or upgraded community scale natural hazard mitigation works.	For consideration at subdivision and building consent stage. Complies with the Policy.
NH-P4 Activities outside of high hazard areas for flooding Provide for subdivision, use and development associated with natural hazard sensitive activities outside of high flood hazard and high coastal flood hazard urban environments where it can be demonstrated that: 1. the nature of the activity means the risk to life and potential for building damage from flooding is low; or 2. minimum floor levels are incorporated into the design of development to ensure building floor levels are located above	As above Natural hazard sensitive activity is defined in the PWDP as *means buildings which:* *a. contain one or more habitable rooms; and/or* *b. contain one or more employees (of at least one full time equivalent); and/or* *c. is a place of assembly;* *except that this shall not apply to:*

the flood level so that the risk to life and potential for building damage from flooding is avoided; and 3. the risk from flooding to surrounding properties is not significantly increased and the net flood storage capacity is not reduced; and 4. the ability for the conveyancing of flood waters is not impeded.	*i. regionally significant infrastructure;* *ii. any attached garage or detached garage to a residential unit or minor residential unit that is not a habitable room;* *iii. any building with a footprint of less than 25m^2; or* *iv. any building addition in any continuous 10-year period that has a footprint of less than 25m^2.*
NH-P5 Activities within the Fault Awareness Overlay and Ashley Fault Avoidance Overlay For activities within fault overlays: 1. only allow subdivision, use and development for natural hazard sensitive activities in the Ashley Fault Avoidance Overlay where the risk to life or property is low; and 2. manage subdivision in the Fault Awareness Overlay so that the risk to life and property is low.	N/A Not in a fault overlay.
NH-P6 Subdivision within the Liquefaction Hazard Overlay Manage subdivision within the Liquefaction Hazard Overlay to ensure that the risk to life and property is low.	N/A In a liquefaction damage unlikely overlay.
NH-P8 Subdivision, use and development other than for any natural hazard sensitive activities Allow for subdivision, use and development associated with activities that are not natural hazard sensitive activities within all natural hazard overlays as there is a low risk to life and property.	N/A The proposal is for residential development only.
NH-P18 Fire and ice risks Manage wildfire and vehicle crash risk on roads affected by ice hazard through restrictions on the planting of woodlots and shelterbelts.	For consideration at subdivision and building consent stage.

NH-P19 Other natural hazards Encourage the consideration of other natural hazards as part of subdivision, use and development.	No other natural hazards identified within a future urban environment.
SASM-O1 Ngā tūtohu whenua The historic and contemporary cultural significance for Ngāi Tūāhuriri mana whenua, of and their relationship with ancestral lands, water, sites, wāhi tapu, wāhi taonga and coastal environment is recognised and provided for.	Near the Site, but not part of the Site, is SASM-025 relating to the Rakahuri/Ashley River. This recognises Ngai Tuahuriri associations with the waterway.
SASM-P1 Integrated management of land and water Adopt an integrated approach that reflects ki uta ki tai (from the mountains to the sea), by recognising the relationship between land use, ecosystems, natural processes and water.	To the extent possible the Site will be fully reticulated to Council designed and managed systems. These will provide an integrated approach to collection, treatment and disposal of sewage and stormwater. Complies with the Policy.
SASM-P2 Urupā Protect urupā from disturbance, except for activities associated with the cultural use, identification and protection of such sites which are undertaken by Te Ngāi Tūāhuriri Rūnanga or their authorised agent.	N/A None identified on the Site.
SASM-P3 Wāhi tapu and wāhi taonga Protect wāhi tapu and wāhi taonga sites from development, disturbance, damage or destruction that would adversely affect the sites and their values and provide for enhancement of cultural and ecological values.	None identified on the Site.
SASM-P4 Ngā tūranga tūpuna Recognise the historic and contemporary relationship of Ngāi Tūāhuriri with the areas and landscapes identified as ngā tūranga tūpuna and:...1-8	To be addressed at subdivision stage.
SASM-P5 Ngā Wai Recognise the cultural significance of the waterbodies, repo/wetlands and those parts of the coastal	None identified for this Site. The Site will be fully reticulated to Council designed and managed systems. These will provide an integrated approach to collection, treatment and disposal of sewage and stormwater.

environment identified as Ngā Wai, and manage the effects of land uses, and activities on the surface of water, to: 1. protect the health of these waterbodies and associated coastal waters, including by maintaining their natural character where it is high and enabling enhancement where it is degraded, including through the reinstatement of original water courses where practicable; 2. recognise historic and contemporary Ngāi Tūāhuriri customary uses and values associated with these waterbodies and coastal waters and enhance opportunities for customary use and access; 3. ensure any land uses adjoining these sites, or structures and activities on the surface of water do not adversely affect taonga species or Ngāi Tūāhuriri customary uses in these areas; 4. ensure new land uses do not create an additional demand for the discharge of sewage or stormwater directly into Ngā Wai, and where the opportunity arises, reduce the need for existing land usesto discharge untreated wastewater or stormwa ter into these areas; 5. protect the health, natural functions and processes of riparian margins and the coastal environment from the adverse effects of adjoining land use activities; and 6. provide for opportunities for the recognition of cultural values within the design, location and installation of infrastructure, while enabling their safe, secure and efficient installation.	
ECO-O1 Ecosystems and indigenous biodiversity Overall, there is an increase in indigenous biodiversity throughout the District, comprising:	N/A No SNA identified. The presence or otherwise of indigenous fauna to be determined at subdivision stage or in consultation with WDC

1. protected and restored SNAs; and 2. other areas of indigenous vegetation and habitat of indigenous fauna that are maintained or enhanced.	Consistent with the Policy.
ECO-P4 Maintenance and enhancement of other indigenous vegetation and habitats Maintain and enhance indigenous vegetation and habitats of indigenous fauna that do not meet the significance criteria in ECO-APP1 by: 1. continuing to assess the current state of indigenous biodiversity across the District; 2. restricting indigenous vegetation clearance or modification of habitat of indigenous fauna, by recognising that indigenous vegetation within: a. the Lower Plains Ecological District and High Plains Ecological District has been widely destroyed, fragmented and degraded by land use and pests and therefore clearance of any remaining indigenous vegetation needs to be restricted in order to protect what remains; and b. the Oxford Ecological District, Torlesse Ecological District and Ashley Ecological District, has a larger proportion of indigenous vegetation remaining and therefore some clearance of indigenous vegetation may be acceptable; 3. recognising that the District contains species that are threatened, at risk, or reach their national or regional	For consideration at subdivision stage in identifying if any qualifying areas of indigenous vegetation and habitat of indigenous fauna are present on the Site and require protection. None known or likely.

distribution limits in the District, and naturally uncommon ecosystems, and limiting their clearance; 4. providing information, advice and advocacy to the landowner and occupier; 5. supporting and promoting the use of covenants, reserves, management plans and community initiatives; and 6. working with and supporting landowners the Regional Council, the Crown, the QEII National Trust, NZ Landcare Trust and advocacy groups.	
ECO-P6 Cultural heritage and customary rights Ngāi Tūāhuriri cultural heritage values associated with indigenous biodiversity will be maintained and enhanced through: 1. providing for the customary harvesting of taonga species by Ngāi Tūāhuriri, while ensuring such harvesting will maintain the indigenous biodiversity of the site; 2. providing for the planting of indigenous vegetation for the purpose of customary harvesting; and 3. encouraging the protection of the values of indigenous species that are taonga to Ngāi Tūāhuriri.	As above.
ECO-P8 Waterbodies Recognising Te Mana o te Wai, maintain the ecological integrity of waterbodies by avoiding indigenous vegetation clearance near them.	For consideration at subdivision stage in identifying if any qualifying areas of indigenous vegetation and habitat of indigenous fauna are present on the Site and require protection.
NATC-O1 Preservation of natural character The preservation of the natural character of the surface freshwater environment, its wetlands, and lakes and rivers and their margins.	N/A No surface water bodies present.

NATC-O2 Restoration of natural character Restoration of the natural character of surface freshwater bodies and their margins where degradation has occurred.	As above.
NATC-O3 Use of freshwater body margins The use of wetlands, and lakes and rivers and their margins are managed to preserve their natural character.	As above.
NATC-P4 Preservation of natural character values Preserve the natural character values of wetlands, and lakes and rivers and their margins, and protect those values by: 1. ensuring that the location, intensity, scale and form of subdivision, use and development of land takes into account the natural character values of the surface freshwater bodies; 2. minimising indigenous vegetation clearance and modification, including where associated with ground disturbance and the location of structures, near wetlands, and lakes and rivers and their margins; 3. requiring setbacks of activities from wetlands, and lakes and rivers and their margins, including buildings, structures, impervious surfaces, plantation forestry, woodlots and shelterbelts; and 4. promoting opportunities to restore and rehabilitate the natural character of surface freshwater bodies and their margins, such as the removal of plant and animal pests, and supporting initiatives for the regeneration of indigenous biodiversity values, and spiritual, cultural and heritage values.	The Site does not contain any wetlands, lakes or rivers.
EW-O1 Earthworks	Earthworks will comply with plan standards or be subject to any necessary regional or district resource consents. Consistent with Policy.

Earthworks are undertaken in a way that minimises adverse effects on amenity values, cultural values, property, infrastructure and the health and safety of people and the environment.	
EW-P1 Enabling earthworks Enable earthworks where they: 1. are compatible with the character, values and qualities of the location and surrounding environment; 2. avoid, remedy or mitigate any adverse effects on any sites or areas identified as ONL, ONF, SAL, Coastal Environment Overlay, SNA, sites and areas of significance to Māori, Natural Open Space Zone, surface freshwater bodies and their margins, or any notable tree, historic heritage or heritage setting; 3. minimise erosion and avoid adverse effects from stormwater or sediment discharge from the site; 4. avoid increasing the risk to people or property from natural hazards; 5. maintain the stability of land including adjoining land, infrastructure, buildings and structures; 6. minimise the modification or disturbance of land, including any associated retaining structures, on the visual amenity values of the surrounding area; and 7. minimise adverse dust, vibration and visual effects beyond the site.	Part of land development involves engineered earthworks which are usually managed through an earthworks and sediment control plan at subdivision stage or though conditions of consent for management of sediment discharge, air discharge consent for dust, and other nuisance. Construction and land development effects are temporary. The Site is effectively flat so no land stability questions will arise. Consistent with policy.
EW-P2 Earthworks within Flood Assessment Overlays Allow earthworks within the Urban Flood Assessment Overlay and Non-Urban Flood Assessment Overlay where:	Earthworks to enable urban development will be engineered and designed in part to manage flood risk from changes in ground levels that affect overland flow paths and to ensure effective control of flood waters to stormwater management areas or

1. the earthworks do not increase the flooding risk to the site or neighbouring sites through the displacement of flood waters; 2. the earthworks associated with proposed subdivision, development or use do not increase the risk to life or property; and 3. the ability to convey flood waters is not impeded as a result of the earthworks.	outfalls to natural waterways. Vast majority of Site has no flood risk, with one east-west flow path medium risk and which can be accommodated at subdivision design stage. Complies with the Policy.
EW-P3 Archaeological sites, and sites and areas of significance to Māori Earthworks avoid, remedy or mitigate adverse effects on archaeological sites and sites and areas of significance to Māori, by having regard to: 1. the particular cultural or historical values of the site and the extent to which these values may be affected; 2. any consultation with mana whenua, in particular any identified mitigation measures or the incorporation of mātauranga Māori into the scale and extent of the earthworks; and 3. any consultation with HNZPT.	The PWDP does not identify any specific archaeological sites and engagement with Ngai Tuahuriri will establish any interest in the Site. Consistent with the Policy.
EW-P4 Scale of earthworks within or adjacent to urban environments Minimise adverse effects related to the scale of earthworks on character, and amenity values within or adjacent to urban environments by: 1. encouraging the integrated design and management of earthworks associated with subdivision, development and use; 2. minimising any off-site effects of earthworks by controlling the duration and sequencing of earthworks; and	Part of land development involves engineered earthworks which are usually managed through an earthworks and sediment control plan at subdivision stage or though conditions of consent for management of sediment discharge, air discharge consent for dust, and other nuisance. A traffic management plan will address vehicle movements to and from the site during Site development at subdivision. Complies with the Policy.

3. avoiding quarry, landfill, cleanfill area, mining, or dam activities within or adjacent to urban environments.	
EW-P5 Rehabilitation Require site rehabilitation during or immediately following the completion of earthworks activity to: 1. minimise adverse effects on amenity values, natural values, cultural values, quality of the surrounding environment and the future use of the site, and 2. encourage rehabilitation that incorporates ecological enhancement and habitat for indigenous fauna and the use of locally sourced indigenous vegetation.	As above
EW-P6 Water resources Avoid adverse effects of earthworks on ground and surface water bodies that could result in water contamination and adverse effects on mahinga kai.	As above.
NOISE-O1 Adverse noise effects Noise does not adversely affect human health, communities, natural values and the anticipated amenity values of the receiving environment.	As above
NOISE-P1 Minimising adverse noise effects Minimise adverse noise effects by: 1. limiting the noise level, location, duration, time, intensity and any special characteristics of noise generating activities, to reflect the function, character and amenity values of each zone; 2. requiring lower noise levels during night hours compared to day time noise levels to protect human health, natural values and amenity values of sensitive environments; and	As above for subdivision earthworks.

3. requiring sound insulation, or limiting the location of noise sensitive activities where they may be exposed to noise from existing activities.	
NOISE-P2 Limited duration noise generating activities Enable specific noise generating activities of limited duration that are: 1. required for anticipated activities within zones or the District, including construction noise…	As above for subdivision earthworks.
NOISE-P3 Rail and roads Protect the operation of rail and road infrastructure by identifying locations where acoustic mitigation measures for any new noise sensitive activities are required.	N/A The Site is internal to the strategic road network and is serviced by a collector road whose primary purpose is traffic distribution.
NOISE-P5 Rangiora Airfield Avoid the development of noise sensitive activities in the Rural Lifestyle Zone within the 55dBA Ldn Noise Contour for Rangiora Airfield and prohibit noise sensitive activities within the 65 dBA Ldn Noise Contour for Rangiora Airfield.	Near Rangiora Airfield but not within noise contours.
LLRZ-O1 Purpose, character and amenity values of Large Lot Residential Zone A high quality, low density residential zone with a character distinct to other Residential Zones such that the predominant character: 1. is of low density detached residential units set on generous sites; 2. has a predominance of open space over built form; 3. is an environment with generally low levels of noise, traffic, outdoor lighting, odour and dust; and	The proposal is for a high density/ high amenity LLRZ but at a minimum net site area 1500m^2 or a minimum net site area of 1000m^2 the development will have a character quite distinct to GRZ land with an average 650m^2 lots. It will be easily distinguished form conventional LLRZ zones on that basis too. The proposal is based on detached residential units on generous lots with a predominance of planted or open space providing a quality setting for built forms and with a dominant residential content ensuring generally low levels of noise, traffic, lighting, odour and dust.

4. provides opportunities for agriculture activities where these do not detract from maintaining a quality residential environment, but provides limited opportunities for other activities.	Amendments to the Policy are proposed as part of the submission to reflect the intent of the LLRZ-D2 proposal.
LLRZ-P1 Maintaining the qualities and character Maintain the qualities and character of the Large Lot Residential Zone by: 1. achieving a low density residential environment with a built form dominated by detached residential units, which other than minor residential units, are established on their own separate sites; 2. managing the scale and location of buildings so as to maintain a sense of openness and space between buildings on adjoining sites and ensuring that open space predominates over built form on each site; 3. ensuring the built form for all activities is consistent with the low density residential character of the zone; and 4. retaining the open character and outlook from sites to rural areas through managing boundary fencing including the style of fencing, their height and visual permeability.	The proposal will be entirely consistent with the Policy in terms of scale, density, openness, space, built form and outlook/ character. The underlying pattern of development exists now so the proposal is effectively re-engineering the existing elements to deliver on the policies preferred qualities and character for the LLRZ zone. Amendments to the Policy are proposed as part of the submission to reflect the intent of the LLRZ-D2 proposal.
LLRZ-P2 Managing activities Manage activities within the zone to maintain the character and amenity values of the zone including by: 1. enabling residential activities and activities ancillary to residential activities, where the scale of activity does not dominate the residential use of the site;	The purpose of the proposal is entirely residential but at a scale, at a level of amenity and at a quality not always achieved in GRZ land. Proposals for community, retail or commercial activities are less likely to be compatible with the high quality/ high amenity environment underpinning the proposal. Some existing uses like horse training will not be compatible with the outcomes being sought so will need to re-locate.

2. providing for agricultural activities, and activities that support agricultural activities where any adverse effects are internalised within the site where the activity occurs; 3. providing for a limited range of community activities, and commercial activities which in terms of location, scale and type of activity are compatible with the predominant activities of the zone, which ensuring that adverse effects of any activity are internalised within the site where the activity occurs; and 4. other than provided for above, non-residential activities, including retail, commercial and industrial activities that would diminish the amenity values and the quality and character of the zone.	Amendments to the Policy are proposed as part of the submission to reflect the intent of the LLRZ-D2 proposal.
LLRZ-P3 Reverse sensitivity Minimise reverse sensitivity effects within the Large Lot Residential Zone or on an existing activity in an adjacent zone by: 1. requiring new activities minimise the potential for reverse sensitivity effects to occur on activities anticipated in the zone; and 2. requiring separation distances between new activities in the Large Lot Residential Zone and existing activities in adjacent zones.	The adjoining land is either residential (to the east across Lehmans Road) or to the north and west RLZ lifestyle land uses. The proposed amended lot sizes for LLRZ D2 will still enable appropriate separation distances and boundary treatments to help minimise adverse reverse sensitivity effects. This will be further considered at master planning/ODP development stage.
LLRZ-P4 Amenity values Maintain amenity values within the Large Lot Residential Zone through: 1. low levels of noise, outdoor lighting, signs, dust, odour and traffic; and	As above.

2. limiting kerb, channel and street lighting compared to other Residential Zones.	
LLRZ-P5 Large Lot Residential Zone Overlay For any Large Lot Residential Zone Overlay, ensure an ODP is developed in accordance with SUB-P6 and incorporated into the District Plan.	An ODP will ensure the residential outcomes and urban connectivity are achieved.

Appendix 3: Section 32 RMA Assessment for Proposed District Plan Submission

Lehmans Road

Introduction and RMA requirements

1. The submitter is lodging a submission on the Proposed Waimakariri District Plan **(PWDP)** to change the zoning of the application site (58.4 ha) from Rural Lifestyle Zone **(RLZ)** to Large Lot Residential Density 2 Zone **(LLR-SCA D2).**
2. The submission has outlined the background to and reasons for the requested submission.
3. The amendments to the Proposed Plan are outlined in the submission. No adverse environmental effects are anticipated by the change of zoning, however the potential environmental effects of implementation of the submission have been described in the relevant sections of the submission.
4. Any change to a plan needs to be evaluated in accordance with section 32 of the Resource Management Act. Waimakariri District Council has also required submitters for re-zoning submissions to prepare a section 32 assessment in support of the submission.
5. Section 32 states:

> *Requirements for preparing and publishing evaluation reports*
> *(1) An evaluation report required under this Act must—*
> *(a) examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of this Act; and*
> *(b) examine whether the provisions in the proposal are the most appropriate way to achieve the objectives by—*
> *(i) identifying other reasonably practicable options for achieving the objectives; and*
> *(ii) assessing the efficiency and effectiveness of the provisions in achieving the objectives; and*
> *(iii) summarising the reasons for deciding on the provisions; and*
> *(c) contain a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal.*
> *(2) An assessment under subsection (1)(b)(ii) must—*
>
> *(a) identify and assess the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions, including the opportunities for—*
> *(i) economic growth that are anticipated to be provided or reduced; and*

(ii) employment that are anticipated to be provided or reduced; and

(b) if practicable, quantify the benefits and costs referred to in paragraph (a); and (c) assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.

(3) If the proposal (an amending proposal) will amend a standard, statement, national planning standard, regulation, plan, or change that is already proposed or that already exists (an existing proposal), the examination under subsection (1)(b) must relate to—

(a) the provisions and objectives of the amending proposal; and

(b) the objectives of the existing proposal to the extent that those objectives—

(i) are relevant to the objectives of the amending proposal; and

(ii) would remain if the amending proposal were to take effect.

5. The Guidance Note on section 32 analysis on the Quality Planning website makes the following statement:

   Appropriateness - means the suitability of any particular option in achieving the purpose of the RMA. To assist in determining whether the option (whether a policy, rule or other method) is appropriate the effectiveness and efficiency of the option should be considered:

   • Effectiveness - means how successful a particular option is in addressing the issues in terms of achieving the desired environmental outcome.

   • Efficiency - means the measuring by comparison of the benefits to costs (environmental benefits minus environmental costs compared to social and economic costs minus their benefits).

6. In this case it is the appropriateness of rezoning rural land for General Residential that needs to be examined.

Objective of the Submission to the Proposed District Plan

6. The objective of the submission is to change the zoning of the application site in the Proposed Waimakariri District Plan from Rural Lifestyle Zone **(LRZ)** to Large Lot Residential Density 2 Zone **(LLR-SCA D2)** in a controlled and managed way through an Outline Development Plan and by adopting, as far as possible, proposed planning zones and subdivision, activity and development standards.
7. Accepting the submission will:
   a) Provide for short and medium term additional housing and residential land choice in Rangiora. The **LLR-SCA D2** will complement the immediately adjoining residential land without compromising the character or amenity of that land;
   b) Provide for urban development that will step out the western edge of the existing township in a manner that enables efficient use of existing and future infrastructure and current land resources by providing a residential character to both sides of Lehmans Road.

Environmental Outcomes – District Plan Objectives and Policies

8. The Proposed Waimakariri District Plan **(PWDP)** objectives give effect to the purpose of the Resource Management Act and the PWDP policies in turn give effect to the PWDP objectives. The objectives are the end goals or end states (including environmental outcomes) to be strived for and the policies are the broad strategies to achieve the objectives.[1]
9. The proposed rezoning has been assessed against the relevant proposed District Plan objectives and policies. It concludes that the requested rezoning is consistent with and meets the outcomes sought by the objectives and policies, but not for urban/township growth and new residential or LLRZ areas. The submission proposes amendments to reflect the intent and planning outcomes for the LLRZ D2 zone.
10. The Site is not identified on the PWDP planning maps within the West Rangiora Future Development Area Overlay (DEV-WR); it is not identified within a FDA in Map A of the Canterbury Regional Policy Statement as amended by Change 1 and is not within the Projected Infrastructure Boundary. It is not within the general growth direction proposed by the Waimakariri District Development Strategy 2018 **(WDDS)** for Rangiora urban growth up to 2049, but is in an area west of Lehmans Road reserved by the Council in its decisions on the RRS for future intensive urban development (presumably post 2048).
11. The most efficient use of the Site is for some form of urban development, given the continuing high demand land for housing at Rangiora, and the Site's location within a logical urban growth path for Rangiora.

Identification of options

12. In determining the most appropriate means to achieve the objectives of the submission, a number of alternative planning options are assessed below. Standard LLRZ zoning is not considered as this is inconsistent with the PWDP approach of excluding this lower density form of LLR development (average 1-2 hhs/ha) adjoining the main District townships.
13. The options considered are:
    a) Option 1: status quo/do nothing: Do not rezone the Site (Rural Lifestyle)
    b) Option 2: submission to rezone the whole site for urban residential use (GRZ).

[1] [1] See PWDP Part 1, HPW Plan Structure

c) Option 3: submission to rezone the whole site as Large Lot Residential D2 (LLRZ).
d) Option 4: resource consent: ad hoc land use and subdivision consent for subdivision through non-complying subdivision and land use consents for residential use.

S32 Matter	**Option 1: Do nothing: Rural Lifestyle Zone**	**Option 2: General Residential Zone**	**Option 3: Large lot Residential D2**	**Option 4: Consents**
Cost	None for submitters. On-going costs for landowners with rural activities managing effects of adjoining residential land uses.	Time and money cost to submitter for submission processes and technical reports. Different servicing costs for respective development densities. Development contributions for Council services Contributes some potential commuter traffic to Greater Christchurch from a portion of the anticipated appx. 700 additional households based on 15 hh/ha.(but site is accessible to public transport services) Some loss of productive rural land but minor given Site is only capable of low intensity production and agistment activities.	Time and money cost to submitter for submission processes and technical reports. densities are a more efficient use of the scarce resource of land so close to an existing, growing urban centre Different servicing costs for respective development densities. Development contributions for Council services Contributes some traffic potential commuter traffic to Greater Christchurch from a portion of the anticipated appx 311 households based on 6.7 hh/ha (but site is accessible to public transport services) Some loss of productive rural land but minor given Site is only capable of low intensity production and agistment activities.	Time and money cost to landowners to seek one-off noncomplying land use and subdivision consents. Consents unlikely to be approved as exceed the permitted RLZ zone dwelling density standards. Community cost and uncertainty in responding to ad hoc applications and not seeing the full scale of possible development at any time.
S32 Matter	**Option 1: Do nothing: Rural Lifestyle Zone**	**Option 2: General Residential Zone**	**Option 3: Large lot Residential D2**	**Option 4: Consents**

Benefit	Ongoing low output rural production on some of the Site. Retains existing rural character and amenity.	Additional housing stock (up to 700 hhs) contributing to the growth of Rangiora. Contributes additional supply of housing to market where there is very strong demand. About 4 years vacant land supply in Rangiora at current building consent rates. Adds competition to the land/housing market in Rangiora. ODP provides overall plan of integrated land development. Implements NPS-UD. Provides more households to support township services/amenities and facilities. Further urban growth at Rangiora consistent with its role as the District's principal township.	Lesser volume of housing stock (appx 311 hhs) contributing to the growth of Rangiora, but complements other existing and proposed higher residential housing areas at west Rangiora and delivers a housing typology in demand but not provided for at Rangiora or elsewhere in the District. Meets NPS-UD Policy 8 criteria for unanticipated rezoning. . Adds competition to the land/housing market in Rangiora ODP provides overall plan of integrated land development for smaller site. Provides more households to support township services/amenities and facilities. Potential ptions for some higher density LLRZ to provide diversity in residential options – can be considered at master planning/ODP stage.	No rezoning required. Benefit to individuals that succeed (but successful applications unlikely)
S32 Matter	**Do nothing: Rural Lifestyle Zone**	**Option 2: General Residential Zone**	**Option 3: Large lot Residential D2**	**Option 4: Consents**
Efficiency/ Effectiveness	Application site remains low productivity rural lifestyle land	Utility services can be most efficiently provided by the Council.	Utility services can be most efficiently provided by the Council.	Least effective and efficient as outcomes from consent processes are uncertain, and

	bounded by urban land use. Rangiora's housing needs not be met. Consistent with WDDS 2018 and RRS.	Effective as it utilises low productivity rural land in a location undergoing rapid urbanisation. Effective in providing for the needs and well-being of landowners according to respective aspirations. Comprehensively provides for extension of the township. Effective in meeting Rangiora housing needs in a physically appropriate location, and implements the NPS-UD but not provided for in CRPS nor PWDP. As such it is less effective as it may undermine effectiveness of planned growth locations eg DEV-WR/ DEV-SER.	More effective and efficient than Option 2 because less impact on strategic planning directions and delivers housing to a sector of the housing market which is not provided for the PWDP or any other strategic planning document, in the face of strong demand. Meets NPS-UD Policy 8 criteria for unanticipated rezoning. Will better meet Rangiora's diverse housing needs.	potentially un-coordinated and lack proper planned integration with the township utilities.

Risks of Acting or Not Acting

14. The Council's strategic intentions for Rangiora are contained in the WDDS 2018 and it has an adopted RRS (Rural Residential Strategy). The staging and implementation proposals in these documents are given effect to in the proposed two development areas for Rangiora in the PWDP and the LLR Overlay.

15. Zoning under the Proposed District Plan has to be robust enough to last the statutory life of the Plan (10 years), and the NPS-UD 2020 also requires that at the end of 10 years the Council is assured that there will be a sufficient supply of appropriately zoned land beyond that point. The risk of not acting in 2021 to re-zone sufficient urban zoned land, and to provide security of land supply over that timeframe, is that, Rangiora will experience issues of uncatered for demand, undersupply of serviced land and a lurch in land and house prices.

16. For LLRZ land the situation is compounded by PWDP polices limiting location, scope and scale of new LLRZ zones. In accordance with the WRRS[2], there are only very

[2] https://www.waimakariri.govt.nz/__data/assets/pdf_file/0035/69686/Rural-Residential-Development-Strategy.pdf

limited LLRZ overlays in the PWDP, at Swannanoa, Ashley/Loburn, Oxford and Gressons Road (north of Woodend and Pegasus). Some are in multiple ownership and some are 'legacy' rural residentials zones that have remained undeveloped for many years. If all were fully developed they would yield appx 385 RR lots. This is highly unlikely given the mixed ownership, and other factors. Putting barriers to LLRZ adjoining the main towns takes away an option that builds on the present nature and scale of development that can be re-engineered for other residential purposes.

17. The risk is that if necessary decisions are not taken today then the sustainable growth and development of Rangiora over the foreseeable planning period is uncertain. The PWDP sets out the feasible development capacity that exists, and forecasts the needs for the medium and long term in UFD-O1. Not re-zoning sufficient land that can support appropriate housing typologies to meet the needs of a range of household needs is not meeting the purpose of the Act, nor meeting the Council's obligations to sustainably manage the natural and physical resources of the Waimakariri District for present and future generations, or the requirements of the NPS-UD 2020.
18. The PWDP does not re-zone the land identified for development in DEV-WR or DEV-SER. It only shows it as FDA and so is not plan-enabled ie the FDAs do not actually contribute at time of district plan notification to the stock of development capacity. The land needs to negotiate a number of processes to be released for development. With only four years vacant land supply there is a risk that lack of supply will reflect in an upward movement in land prices creating further issues of affordability.
19. An issue arises with the PWDP proposal to release land for development 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 but is for the new Rangiora and Kaiapoi Development Areas. As the proposed Lehmans Road LLR D2 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.
20. The certification process is claimed to be more responsive, timely and cost-effective than a conventional private plan change approach.
21. What the s32 in support of this innovative approach does not do is test the efficiency and effectiveness of certification against the opportunity presented by the notification of the PWDP for the Council to just zone the new Development Areas and any additional land sought to rezoned through submissions, including this submission. . The certification process has the effect of transferring the costs of re-zoning largely

on the private sector applicant, and not engaging the public funded costs that go with the RMA duty to provide for planned and sustainable approach to the management of district resources for the life of the district plan.

22. There is a risk that applicants may shy away from certification because of the uncertainties associated with it as it is presently set out in the PWDP. Those uncertainties are described in the submission. 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.

23. A potential effect of the certification process not being taken up is that the statutory duty of the Council to meet the requirements of the NPS-UD are simply not met, that its s31 RMA duties are not fulfilled; that the PWDP does not provide plan-enabled land; and seems to fly in the face of a sound, structured strategic planning process to date (the WDDS) not being implemented. All the ground work seems to have been done, but the Council seems to have become gun shy in fronting the costs and the process of just re-zoning in the PWDP (only the second district plan under the RMA).

24. There is a risk arising from the Council not acting now as is its RMA and LGA duty to provide a co-ordinated, staged and funded approach to land development over the four development areas from a land use viewpoint (the PWDP) and for servicing (Asset Plans, 10 year financial strategy and LTP under the LGA).

25. When multiple landowners and developers are involved 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. That co-ordination and management of land release should sit with the Council as it holds the key as the infrastructure provider.

26. There is a risk that land supply is controlled by a limited number of large developers, who will act out of self-interest in either land-banking or staging release of land to maximise returns and creating pressure on other developers around access to and agreements on servicing. Allowing proposals such as this proposal which are in multiple ownership, not held be development companies, provides competition to the housing/land supply market but that competition may fail to arise through the certification process. That will not be giving effect to an element of the NPS-UD 2020.

27. The submitters will commission a number of reports: soil contamination, geotechnical, ITA, and servicing reports to inform and shape the development proposal either as evidence to any hearing, or at subdivision stage.

28. There is no risk that a decision will be made in an absence of expert advice and appropriate technical solutions for servicing and design and there is the subdivision and detailed design stage to be passed.
29. All these inputs to the proposal mean there is little, if any, uncertain or missing information in relation to this proposal.
30. It is therefore considered that there are no significant risks of acting to adopt or accept the submission.

Summary of s32 evaluation

S32 Evaluation	Option 1: Do nothing: Rural Lifestyle Zone	Option 2: General Residential Zone	Option 3: Large lot Residential	Option 4: Consents
Objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of this Act	±	X	++	×
Whether the provisions in the proposal are the most appropriate way to achieve the objectives	×	X	+	×
Benefits	+	X	++	×
Costs	×	++	++	±
Risks	+	××	××	××

×: does not achieve the matter, negative effect

+: does achieve the matter; positive effect

++: significant effect

±: neutral in relation to the matter

Overall Assessment

31. Based on the above assessment, it is concluded that the submission to re-zone the Site from RLZ zone to LLRZ D2 zone is the most appropriate method for achieving the objectives of the proposal, than the other alternatives also considered above.
32. Option 2 and 3 are not consistent with a range of District Plan policies including that it does not sit square with the implementation signalled in WDDS 2018 and RRS.

33. Option 3 to re-zone the Site LLRZ D2 is the most appropriate given:
    a) The proposals adopt a modified PWDP zone, and modified development and activity standards. This ensures continuity of District Plan anticipated environmental outcomes and urban amenity for Rangiora;
    b) Will be consistent with and give effect to many of the relevant proposed District Plan objectives and policies, including as sought to be amended by this submission;
    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 in the Rural Lifestyle Zone;
    d) There is no additional cost to the Council in re-zoning the Site land in this proposal as there is expected to be capacity in the public utilities and the existing road network, including planned upgrades, will accommodate the traffic effects of the proposal;
    e) A proposed ODP provides 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.
34. The inclusion of the LLRZ D2 Zone in the proposal is considered to be appropriate to achieve the sustainable growth and development of Rangiora.
35. The economic, social and environmental benefits of the proposal outweigh the potential costs.
36. The overall efficiency and effectiveness of the proposal (Option 3) is high, in comparison the alternative options which are low (Options One Two and Four).

37. The proposal is considered to be the most appropriate, efficient and effective means of achieving the purpose of the Resource Management Act 1991.

Submission on Draft Waimakariri Development Strategy 2048

Fiona Mules and Walter Radford

July 2017

Waimakariri District Council

WAIMAKARIRI DISTRICT COUNCIL

SUBMISSION ON DRAFT WAIMAKARIRI DEVELOPMENT STRATEGY 2048

Submitter Details

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We would like to be heard in support of this submission.

Submission:

1. Our submission applies to the Draft Waimakariri Development Strategy 2048 ('the WDDS 2048'), and in particular but not limited to Rangiora township.

The Submitters

2. Fiona Mules and Walter Radford ('the Submitters') between them own three existing 4 ha blocks on the west side of Lehmans Road north of Oxford Road (as shown the map attached as **Appendix A**), and legally described as:-

   Walter Radford - Lot 7 DP 328154 (4 ha)
   Fiona Mules - Lot 6 DP 328154 (4 ha), Lot 5 DP 328154, (4 ha)

3. In addition, the following parties also support further residential development of their blocks:-

   J & D Stewart - Lot 8 DP 329154 (4ha)

GB & RJ Laloli, GC Saunders – Lot 8 DP 83812 (4.3 ha)
Jacky & Dale May - Lot 5 DP 83612 (4 ha)
Mike & Sharon Brown - Lot 6 DP83612 (4 ha)
Ken Odgers (D I Haigh) – Lot 7 DP83612 (4.7 ha)
Robyn Mauger - Lot 2 DP328154 (4.1 ha)
Margaret Robinson - Lot 1 DP 83770 (4 ha)
Ian Sunkell & PL Calder – Lot 4 DP328154 (4.3 ha)

4. The Submitters seek that their land and all of the above blocks and such other land as may be appropriate for resource management reasons, be identified for rural residential development in the WDDS 2048, and rezoned for rural residential purposes. They seek that the land be rezoned by the Council in the immediate future, so that rural residential development can proceed (in the District Plan Review, to be notified in 2018).

Background – Waimakariri Rural Residential Development Strategy 2010

5. The Submitters have been consistently seeking rural residential status for their land (and such other neighbouring land as may be appropriate for sound resource management reasons e.g urban/rural form, servicing, creating logical zone boundaries) over a number of years. This includes submitting on the Waimakariri Rural Residential Strategy 2010 (RRDS) and the Council 10 Year Annual Plan (see copies of submissions attached as **Appendix B**).

6. The RRDS does not identify land west of Lehmans Road, including our land, as a rural residential growth area on the following basis:-

> West of Lehmans Road
> This area does not have any identified constraints that would preclude the area being developed in the long term. However, in the short term development within this area is likely to compromise any further long term growth for Rangiora to the west.

7. In essence, land west of Lehmans Road was excluded on the basis that it may preclude long term growth of Rangiora to the west. The WWDS 2048 now provides for the Council's long term growth strategy (to 2048 ie next 30 years) and does not identify land west of Lehmans Road for long term growth. In the very long term (30-50 years), land west of

Lehmans Road south of Oxford Road could be made available for urban growth, but given the existing pattern of 4 ha blocks north of Lehmans Road, we consider our land and other 4 ha blocks north of Lehmans Road with existing access to Lehmans Road, is more suited to rural residential development. We note that the Milford Farm block, the only larger block, is to some extent compromised for full residential development by power lines running across the property. However, residential development is feasible and has occurred adjoining the existing powerlines (but outside Transpower's setback requirements, at Helmore Street on the east side of Lehmans Road).

Existing Land Use Pattern and Zoning

8. The above 4 ha blocks are part of an established area of 14 x 4 ha blocks on the west side of Lehmans Road, each with an existing dwelling (except for one of the Mules blocks) and all with legal access to Lehmans Road (5via right of way). The Lehmans/Oxford Road corner block also has the Rangiora Vetinerary Centre. Adjoining to the west along Lehmans Road is a larger block (27 ha) owned by Milford Farm Ltd, which is presumably farmed with other land owned by Milford Farm located south of Oxford Road (a further 36.2 ha).

9. The 4 ha blocks are essentially lifestyle blocks, predominantly used for grazing and horse training (there are horse training tracks on three blocks).

10. The balance of land between Lehmans Road and Mertons Road includes 4 ha lifestyle blocks with existing dwellings for the northern portion, 3 x 4 ha blocks along the Mertons Road frontage towards Oxford Road and balance farmed areas without dwellings.

11. Lehmans Road forms the current township boundary north of Oxford Road, apart from an existing R4A zone north of power lines which run north west / south east on both sides of Lehmans Road. The power lines form the boundary line between R2 and R4A zones on the east side of Lehmans Road. The R2 area is largely developed and includes some high density housing next to the power lines. The R4A zone is not yet developed.

12. The east side of Lehmans Road between Oxford Road and the R4A zone west of Brick Kiln Lane properties, is currently under development for residential subdivision.

13. All land west of Lehmans Road is currently zoned Rural.

Rangiora Urban Growth Directions

14. The WDDS 2048 proposes an urban growth management approach which focusses future growth around existing townships where growth can maximise efficiency of infrastructure, services, amenities and transport. We support this approach in principle, and consider it is also appropriate for future rural residential development given that such development will require reticulated services. We accept that some rural residential development may be appropriate adjoining smaller townships including the District's coastal settlements (subject to suitability in terms of natural hazards etc), to provide a diversity of living options.

15. The WDDS 2048 proposes extending residential growth westwards as far as Lehmans Road (ie south of Oxford Road and Johns Road). We support this as it will ensure an appropriate urban form, providing a consistent urban boundary edge (Lehmans Road) consistent with the extent of urban development (to Lehmans Road) north of Oxford Road.

16. The WDDS 2048 proposes that residential growth will predominantly be the east, rather than west of the existing township, principally on the grounds that this will "*better position Rangiora town centre in the middle of an overall settlement pattern".* We support this approach in principle. We note that for the proposed growth directions (both east and west south of Oxford Road) there are a generally a smaller number of landowners with larger holdings than west of Lehmans Road, north of Oxford Road which contains a significant number of 4 ha blocks.

17. Urban residential development is generally easier to facilitate where there are a smaller number of larger holdings (subject to the landowners wishing to proceed with urban development) than in established 4 ha and/or rural residential areas. Intensification of the latter (in particular rural residential areas) is more likely to occur in an 'organic' fashion over many years. It is inherently slower and more 'piecemeal' than greenfield development given the different aspirations, timeframes and in some cases financial expectations of existing landowners (if selling to landowners). Positioning of existing dwellings and gardens also limits the degree of feasible 'densification'. The potential for intensification can also be limited by difficulties in 'retrofitting' infrastructure, and coordinating its provision e.g. roading

across multiple land parcels. These difficulties can be avoided if new rural residential areas are 'future proofed' for future potential intensification ie. the rural residential layout (eg roading, other services) is designed from the outset for the ultimate intended residential densities.

18. The above potential difficulties are not as significant for established 4 ha areas and we note that there are urban edge areas with this existing character which are now urban growth areas e.g. north west Christchurch, south Rolleston (Branthwaite Drive).

19. The WDDS 2048 does not show the land west of Lehmans Road and north of Oxford Road as a future residential growth direction. We support this, and consider this land is more suited for rural residential development for the reasons outlined below under 'Suitability for Rural Residential Development'.

20. In the very long term (30-50 years), land west of Lehmans Road south of Oxford Road could be made available for urban growth, but given the existing pattern of predominantly 4 ha blocks north of Lehmans Road, we consider our land and other land north of Lehmans Road is more suited to rural residential development. We note that the Milford Farm block, the only larger block, is to some extent compromised for full residential development by power lines running across the property.

21. In the event that Council has a remaining concern that rural residential development west of Lehmans Road (north of Oxford Road) could compromise the very long term growth direction of Rangiora (post 2048), it could consider a 'future proofed' form of urban development as outlined below under 'Future Proofed Rural Residential Development' below.

22. As a further alternative, the northern portion of west Lehmans Road north of Oxford Road comprising 4 ha blocks could be zoned for rural residential densities with the balance southern portion available for standard urban residential purposes (see suggested concept attached as **Appendix C**). The two existing southern most 4 ha rural residential blocks fronting the west side of Lehmans Road, could be designed in a manner that was 'future proofed' for future urban residential development. The 4 ha block 'rural residential subarea' would be consistent with the existing R4A opposite on the east side of Lehmans

Road. However, equally we consider that this existing R4A zone could be rezoned for standard residential purposes, with our land providing replacement rural residential zoning in the immediate vicinity. This would be consistent with the Rangiora urban form, where Lehmans Road defines the western extent of urban growth, at least in the short/medium term.

Management of Interface Between Urban, Rural Residential and Rural Land

23. Land west and south west of the proposed West Lehmans Road rural residential zone could be identified in the very long term (30 years +) for rural residential or residential development. We do not consider that rural residential areas necessarily need to adjoin rural zoned land provided they are designed in a manner which ensures a lot layout and other design measures that retains the appropriate degree of 'ruralness' within the subdivision.

24. We consider a 'midblock' boundary between the proposed rural residential and rural boundary (for the next 30 years at least) is entirely defensible and appropriate in resource management terms. We refer to the urban design evidence (Nicole Lauenstein) presented to a recent rural residential rezoning hearing proposed for West Tai Tapu, Selwyn District Council (Plan Change 49) as follows:-

I would like to explain the following terms 'edge definition' and 'discernible boundary' within the context of urban design in more detail. Edge definition can be achieved visually and physically through a distinct contrast in the environment such as:-

- a level change a strong differentiation between horizontal and vertical such as a wall
- a transition zone from one environment to another such as buffer vegetation
- a physical obstacle i.e a river – mountain range etc

A discernible boundary within the context of urban design is a boundary that can clearly "hold development" and prevent it from further expansion. These are often wide and properly established areas of vegetation like stormwater treatment areas, forests and parks, significant contour changes like the Port Hills to the east or natural physical barriers like the Halswell River and often a combination of the above. A street however by its nature is a connecting feature creating access to both sides of the street and is therefore not considered a strong boundary within an urban design context as it is unable to "hold" or contain an urban form and provide a longterm boundary for development.

…it is also interesting to observe that houses on smaller residential sites with the ability to overlook the rural environment tend to close themselves off from that environment. This is not due to reverse sensitivity but due to wanting to achieve a sense of privacy and shelter. There is a natural space around a dwelling that people wish to demarcate and create as an exclusive private environment. On larger sites this will result in a domestic curtilage and on smaller sites this will result in becoming fenced in. Small residential sites therefore struggle to make good use of the open rural environment as opening up exposes the private outdoor functions. This is a very common and natural behaviour.

Forming boundaries is about *how* two environments engage with each other. For two complementary environments this requires little space and no transitional area as they are in tune with each other. Where two opposing environments meet more space is required to allow for a transitional area or buffer to provide a level of protection to private spaces. I have travelled extensively through the rural parts of New Zealand and have encountered this in nearly all places where open rural spaces meet small urban spaces. The only exemption is where there are landscape features that create an intermediary space and reduce the openness of the rural environment i.e. a river bed, strong contour changes etc. A secondary reason for closing itself off is climatic conditions and particularly wind.

….From an urban design perspective peri-urban rural residential developments require connectivity, access and circulation patterns that are to some extent similar to the adjacent urban networks but have a more generous size/spacing and more rural feel and character. Peri-urban RR developments therefore have the ability to structurally integrate to a sufficient level so as to become part of the built fabric and to assist in defining the urban form of a township. This connectivity to the urban environment is what differentiates this denser type of rural residential form from the more independent larger 4ha lot.

Whilst peri urban RR developments can structurally integrate into the urban fabric of a township they still remain distinctly different in visual and physical amenity and character. As such they are well suited to constrain urban sprawl where discernible boundaries to urban development are missing.

Suitability for Rural Residential Development

25. Our land (and the other blocks identified above on the west side of Lehmans Road north of Oxford Road) is ideally suited for rural residential development, including for the following principal reasons:-

- It is an ideal ‘urban edge’ location for rural residential development which will support existing infrastructure and community facilities;
- There is limited existing provision for rural residential development at Rangiora ‘urban edge’ locations even though Rangiora is the District’s largest town. There is only one area identified in RRDS in the south east, for approximately 25

households, which remains unzoned. Existing zoned areas are limited to small R4B zones on the South Belt and Townsend Road corner (undeveloped) and north West Belt in the vicinity of River Road and west of Ballarat Road (fully developed with 14 lots); and the small R4A zone opposite on the east side of Lehmans Road (undeveloped);

- Lehmans Road is identified as the long term western boundary for Rangiora in the WDDS 2048 so the land is not within the long term future growth path for Rangiora;
- The location is a highly desirable place to live (close to urban amenities and north west Rangiora is 'higher and drier' than other parts of Rangiora and considered the most desirable part of Rangiora in terms of market demand);
- The proposed zoning complements the mix of Residential 2 and Residential 4A on the opposite (east) side of Lehmans Road.
- Rural residential development can be readily serviced by an extension of existing urban services (see servicing report prepared for the RRDS submission attached as **Appendix D** which is still largely relevant);
- Land parcels are existing 4 ha lots, which are used for lifestyle farming rather than being highly productive farmland. They lend themselves to further subdivision into rural residential lots, with various of the landowners having sited their dwellings with this development option in mind;
- The land is not subject to any of the development constraints identified on the District's Main Town Constraints' map (page 5 WDDS).
- No intensive farming or other activities in the vicinity which are likely to result in adverse reverse sensitivity effects.

Future Proofed Rural Residential Development

26. Future proofed rural residential development is a potential option the Council may wish to consider further for the two southernmost 4 ha blocks with frontage to Lehmans Road, and adjoining the Milford Farm block. The Selwyn Rural Residential Strategy (2014) includes two preferred rural residential areas that are in probable future urban growth paths and, accordingly, are required to be 'future proofed'. Future proofing is explained as follows:-

> 7.7 Some of the rural residential areas included in this Strategy are located in future growth paths for the towns concerned. Despite the lack of any intention by the current land owners to ever become

fully urban, development of these sites should be undertaken in a way which enables eventual redevelopment at full urban densities to be readily achieved if this should be considered appropriate at some stage in the future.

7.8 Such future proofing would require a combination of design and legal techniques. The design aspect consists of designing a layout in two stages, firstly the rural residential layout and then the ultimate development overlaid on this. Initial layouts must not preclude a high standard of ultimate development. Therefore the spatial requirements for ultimate large facilities such as roads, open space and surface water management must be identified and set aside at the outset so that initial rural residential development, and in particular the siting of houses does not prevent the ultimate availability of land for these facilities.

7.9 The initial roading pattern and underground services would have to be installed in such a way as to avoid the need for complete replacement later. This applies particularly to sewerage, which may have to be oversized at first. This can cause problems of its own, e.g. low flows. Techniques such as laying smaller pipes within larger ones, and the use of flush tanks may avoid such problems.

7.10 The legal techniques would be conditions of subdivision consent, consent notices on titles and perhaps covenants in favour of the Council ensuring that at the time of conversion to full urban development, the then owners of rural residential lots would not be able to oppose the intensification or withhold the necessary land. Consideration should be given for such land to be actually vested with the Council as road or utility reserves at the time of the initial rural residential development and perhaps leased back at a peppercorn rental to adjacent rural residential owners for interim use and maintenance.

Rural Residential Development – New Rural Residential Areas/Intensification of Existing Rural Residential Areas

27. The WDDS 2048 proposes two alternative options for providing for rural residential living, namely:-

Option 1: new rural residential areas identified and co-located with existing rural residential areas or on the edge of existing towns. This assumes not intensification of existing rural residential areas.

Option 2: intensification in existing rural residential areas (e.g. enable larger lots to be subdivided down to 2500m^2). This assumes no new rural residential areas provided.

28. Our proposal comes under ‘Option 1’ ie a new rural residential area on the edge of an

existing township (Rangiora).

29. These options are not mutually exclusive and provision could be made for both in the District, in appropriate locations. Intensification of existing rural residential areas generally occurs in an 'organic' and piecemeal way over an extended period depending on existing owners aspirations and timeframes (as further discussed above under 'Rangiora Growth Directions'). It may be appropriate to provide for intensification of some established rural residential areas (eg.some lower density R4B areas, or historical 2 ha blocks, such as at Mandeville, or where the location is close to existing township facilities and services so now more suited for standard residential development).

30. In our case, a new rural residential area is proposed for an area of existing 4 ha blocks where all existing landowners, as far as we know, are are supportive (we have been unable to make contact with a small number of landowners at the time of filing the submission but all those listed above are activity in support).

Rural Residential Land: Supply and Demand

31. The RRDS identifies rural residential areas which will provide an additional 1045 rural residential households in various locations in the eastern part of the District. This is considerably less than the previous Regional Policy Statement Change 1 allocation of 1510 households to the District (the current RPS Policy 6.3.9 provides for 'limited provision' for rural residential but does not specify a quantitative allocation). Some of the RRDS rural residential development areas remain unzoned and undeveloped, indicating that zoning is not sufficient to ensure the delivery of rural residential sections. This is recognized in the National Policy Statement on Urban Development Capacity (NPS-UDC) which requires Councils to provide a 3 year supply of feasible development land, and make provision in the Long Term Plan for a 10 year supply, including a 20% additional margin of feasible development capacity over and above the projected demand (which factors in the proportion of feasible development capacity that may not be developed). Feasible development is defined in the WDDS 2048 as "*Development that is commercially viable taking into account the current likely costs, revenue and yield of development.*"

32. We are confident that our land (and other neighbouring land west of Lehmans Road) is feasible to develop given the proximity of reticulated services, the good quality ground

conditions and the market desirability of this part of Rangiora.

33. The RRDS rural residential development areas have not been assessed against the new NPS-UDC requirements, but some at least, are unlikely to meet them. For example, Kaiapoi Waterways (south east Kaiapoi) which is low lying, in a high hazard area and highly likely to be subject to liquefaction and lateral spread damage in the event of a significant earthquake event. Other areas may remain undeveloped due to landowners intentions not to develop at this stage e.g. if land is utilized as part of a larger farming operation. Technically the NPS-UDC does not apply to rural residential land, but the concept of feasible development is equally applicable and helpful in determining what is development ready land which is likely to result in the delivery of sections in the short and medium term.

34. 5 of the 8 rural residential development areas in the RRDS have not been rezoned for rural residential purposes (private plan change requests are required for rezoning). These are locations at Waikuku, south east Rangiora, south east Kaipoi, south east Woodend and north Kaiapoi, intended to provide for around 595 households combined, more than half of the total RRDS provision for 1045 rural residential households.

35. Whilst it could be argued that the lack of zoning reflects a lack of demand, we consider that this is unlikely to be the case. The continued subdivision of 4 ha blocks in the District (as noted in the WDDS 2048 there are now 1300 blocks in the 4-4.99 ha size range) is largely for lifestyle purposes (4ha blocks are too small for economic farming purposes) because there is a limited supply of smaller rural residential sized sites which is generally the market preference for rural lifestyle living. This is borne out by real estate experience in (see **Appendix E** attached). Experienced local real estate agent Richard Woerlee advises:-

> Having been involved in selling lifestyle properties in the Waimakariri District for the past 10 years, I have seen a consistent growth in demand for all varieties of lifestyle properties. The most popular lifestyle properties are the ones that are located within a 5km radius of the township and its amenities.
>
> With rapid expansion within the Waimakariri area the strong demand for rural residential lots will in our opinion continue. Whilst there is enquiry for the larger 4ha lots it is the smaller land size that is very popular for those seeking a semi-rural lifestyle property. We find many of our clients unable to manage a 4ha landholding.
>
> If a rural residential subdivision went ahead in the location you are proposing we are completely confident that there would be an immediate response from potential purchasers and the properties would be in high demand.

Implementation of the WDDS 2048

36. The WDDS 2048 implementation strategy proposes a review of the Waimakariri Rural Residential Plan *"to implement final District Development Strategy directions",* however there is no date specified as to when the review will be undertaken (unlike provisions in relation to rural living, provision of zoned land to accommodate growth and opportunities for intensification and regeneration which are all to implemented through the District Plan Review in 2017-2019). The RRDS only covers the eastern part of the District whereas the WDDS 2048 covers the entire District.

37. We consider it is essential that the District's rural residential needs are considered at the same time as the District's urban growth needs and rural policies as the three elements are inextricably linked. The RRDS review should be undertaken in the immediate future and 'inform' and be implemented through the District Plan Review.

Relief Sought

38. In light of the above, we seek retention and/or amendments to the WDDS 2048 as set out below:-

- Retain the overall WDDS approach of identifying proposed growth directions for the main townships;
- Extend the scope of the WDDS to cover rural residential as well as urban and residential growth directions, to ensure a holistic and integrated approach to the management of future District growth, including identification of short, medium and long term urban growth paths; and areas for greenfield rural residential development (including potentially some 'future proofed' rural residential areas); and possibly areas for potential rural residential intensification;
- In order to facilitate the above, review the RRDS now, but extend to cover the entire District;
- Retain Lehmans Road as at least the short (3 year) and medium (10 year) western boundary of Rangiora township. Identify land west of Lehmans Road and north of Oxford Road as a rural residential growth direction, particularly those parts (including our land) which is in existing 4 ha parcels and thus well suited for rural residential development;

- Identify our land and other land as shown on the Concept Plan as ‘Proposed Rural Residential’ in the WDDS 2048 as a proposed rural residential growth direction;
- Implement the revised WDDS 2048 which identifies residential, business and rural residential growth directions, including zoning of the ‘Proposed Rural Residential’ area shown on the Appendix C Concept, including our land, through the District Plan Review, to be notified in 2018;
- Any consequential amendments to the WDDS to give effect to the intent of this submission.

……

(Signature of applicant or person authorized to sign on behalf of the applicant)

Date: July 14, 2017

Appendices:

Appendix A: Quick Map Location Plan

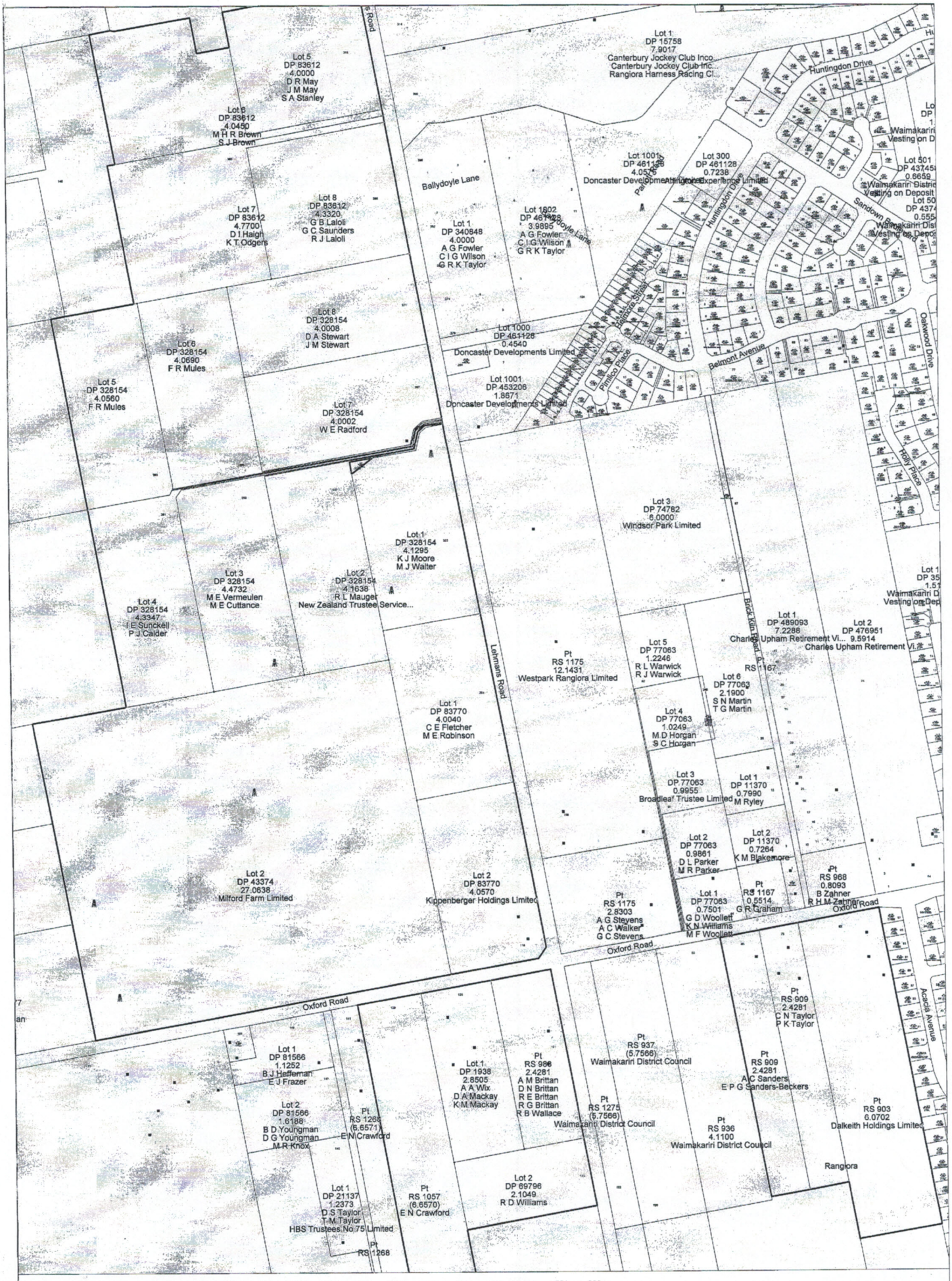
Appendix B: Submissions by W Radford on Rural Residential Development Strategy 2010 and Draft 10 Year Plan 2012

Appendix C: Rangiora Future Growth Concept: West of Lehmans Road, north of Oxford Road

Appendix D: Servicing Report (in support of W Radford submission on 2010 Rural Residential Development Strategy)

Appendix E: Bayleys Letter

Appendix A – Location Plan


Lot 1
DP 15758
7.9017
Canterbury Jockey Club Inco...
Canterbury Jockey Club Inc...
Rangiora Harness Racing Cl...
Huntingdon Drive
Lot 5
DP 83612
4.0000
D R May
J M May
S A Stanley
Lot 6
DP 83612
4.0450
M H R Brown
S J Brown
Lot 7
DP 83612
4.7700
D I Haigh
K T Odgers
Lot 8
DP 83612
4.3320
G B Laloli
G C Saunders
R J Laloli
Ballydoyle Lane
Lot 1
DP 340848
4.0000
A G Fowler
C I G Wilson
G R K Taylor
Lot 1002
DP 461128
3.9895
A G Fowler
C I G Wilson
G R K Taylor
Lot 1001
DP 461128
4.0575
Doncaster Developments Limited
Lot 300
DP 461128
0.7238
Attraction Experience Limited
Parkview Drive
Huntingdon Drive
Sandown Boulevard
Lot 501
DP 437454
0.6659
Waimakariri District Council
Vesting on Deposit
Lot 8
DP 328154
4.0008
D A Stewart
J M Stewart
Lot 6
DP 328154
4.0690
F R Mules
Lot 5
DP 328154
4.0560
F R Mules
Lot 7
DP 328154
4.0002
W E Radford
Lot 1000
DP 461128
0.4540
Doncaster Developments Limited
Lot 1001
DP 453206
1.8671
Doncaster Developments Limited
Pimlico Place
Belmont Avenue
Oakwood Drive
Holly Place
Lot 3
DP 74782
6.0000
Windsor Park Limited
Lot 1
DP 328154
4.1295
K J Moore
M J Walter
Lot 3
DP 328154
4.4732
M E Vermeulen
M E Cuttance
Lot 2
DP 328154
4.1638
R L Mauger
New Zealand Trustee Service...
Lot 4
DP 328154
4.3347
I E Sunckell
P J Calder
Lehmans Road
Pt
RS 1175
12.1431
Westpark Rangiora Limited
Lot 5
DP 77063
1.2246
R L Warwick
R J Warwick
Brick Kiln Road
Pt
RS 1167
Lot 6
DP 77063
2.1900
S N Martin
T G Martin
Lot 1
DP 489093
7.2288
Charles Upham Retirement Vi...
Lot 2
DP 476951
9.5914
Charles Upham Retirement Vi...
Lot 1
DP 35
1.51
Waimakariri D
Vesting on Dep
Lot 1
DP 83770
4.0040
C E Fletcher
M E Robinson
Lot 4
DP 77063
1.0249
M D Horgan
S C Horgan
Lot 3
DP 77063
0.9955
Broadleaf Trustee Limited
Lot 1
DP 11370
0.7990
M Ryley
Lot 2
DP 77063
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D L Parker
M R Parker
Lot 2
DP 11370
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K M Blakemore
Lot 2
DP 43374
27.0638
Milford Farm Limited
Lot 2
DP 83770
4.0570
Kippenberger Holdings Limited
Pt
RS 1175
2.8303
A G Stevens
A C Walker
G C Stevens
Lot 1
DP 77063
0.7501
G D Woollett
K N Williams
M F Woollett
Pt
RS 1167
0.5514
G R Graham
Pt
RS 968
0.8093
B Zahner
R H M Zahner
Oxford Road
Oxford Road
Pt
RS 909
2.4281
C N Taylor
P K Taylor
Acacia Avenue
Lot 1
DP 81566
1.1252
B J Heffernan
E J Frazer
Lot 1
DP 1938
2.8505
A A Wix
D A Mackay
K M Mackay
Pt
RS 986
2.4281
A M Brittan
D N Brittan
R E Brittan
R G Brittan
R B Wallace
Pt
RS 937
(5.7566)
Waimakariri District Council
Pt
RS 909
2.4281
A C Sanders
E P G Sanders-Beckers
Lot 2
DP 81566
1.6188
B D Youngman
D G Youngman
M R Knox
Pt
RS 1268
(6.6571)
E N Crawford
Pt
RS 1275
(5.7566)
Waimakariri District Council
Pt
RS 936
4.1100
Waimakariri District Council
Pt
RS 903
6.0702
Dalkeith Holdings Limited
Rangiora
Lot 1
DP 21137
1.2373
D S Taylor
T M Taylor
HBS Trustees No 75 Limited
Pt
RS 1057
(6.6570)
E N Crawford
Lot 2
DP 69796
2.1049
R D Williams
Pt
RS 1268
0
50
100
150
200
250
300
350
400
450
500
550
600m
QuickMap
Custom Software Ltd
Any person wishing to rely on the information shown on this map must independently verify the information
Scale 1:5000
Topographical and Cadastral map derived from LINZ data. Printed: 22/06/2017 12:17.

Appendix B :

Submissions by W Radford on Waimakariri Rural Residential Strategy 2010

& Draft 10 Year Plan (2012)

SUBMISSION FORM:
DRAFT RURAL RESIDENTIAL DEVELOPMENT PLAN

To: Draft Rural Residential Development Plan Submissions
Waimakariri District Council
215 High Street
Private Bag
Rangiora 7440

Fax 03 313 4432
E ruralresidentialplan@wmk.govt.nz

Name:	Wally Radford
Postal Address:	c/- Fiona Aston Consultancy Ltd PO Box 1435 Christchurch 8140
Telephone:	03 3828898
Fax:	03 3828858
Email:	fiona.aston@xtra.co.nz

Submission Comments & Decision you'd like the Council to make:

I seek that North West Rangiora, west of Lehmans Road, between Priors Road and Oxford, be identified as a preferred location for rural residential growth in the Council's Rural Residential Development Plan.

In particular, blocks owned by myself and other family members, as listed below, and number on the Appendix A plan should be included, as listed below:-

Block 1, Lot 2 DP 39814, 4.1 ha (W A Radford)
Block 2, Lot 7 DP 328154, 4 ha (WA Radford)
Block 3, Lot 8 DP 329154, 4 ha (J & D Stewart)

In addition, I am aware that the following parties also support rural residential for their blocks:-

Block 4, Lot 8 DP 83612, 4.3 ha (G & R Laloli)
Block 5, Lot 5 DP 83612, 4 ha (D & J May & S Stanley)

These blocks should also be included.

In accordance with the above, I seek that the blocks shown on the attached plan marked as Appendix A be included as a preferred location for rural residential growth, and such other additional areas as may be appropriate for sound resource management reasons under the Resource Management Act 1991 (e.g in terms of urban/rural residential form, servicing, creating logical Rural Residential Zone boundaries).

My reasons for supporting the decision:

North West Rangiora west of Lehmans Road is ideally located for rural residential development. It is an 'urban edge' location where further residential development will support existing infrastructure and community facilities, is free of environmental constraints and is one of the most desirable parts of Rangiora from a market demand perspective.

The Council's Draft Rural Residential Development Plan makes very little provision for future rural residential development at Rangiora 'urban edge' locations even though Rangiora is the District's largest township (only one area in the south east, for approximately 60 additional households). Rangiora 'urban edge' locations are ideal for further rural residential development in terms of sustainable development considerations, because of the proximity to existing services and facilities.

Rural residential development will complement the mix of Residential 2 and Residential 4A (rural residential) zoning recently approved for the opposite (east) side of Lehmans Road by way of decision on Plan Change 1 to the Waimakariri District Plan (Doncaster Developments).

The land parcels are currently for the most part 4 ha lots, which are used for lifestyle farming rather than being a highly productive farming area. They lend themselves to further subdivision into rural residential lots, with various of the landowners having sited their dwellings with this longer term option in mind.

The landowners within the area identified in Appendix A are generally in support of rural residential development of the land.

The proposed rural residential area can be readily serviced by an extension of reticulated services along Lehmans Road.

There are no potentially noxious farming or other activities in the general vicinity which could give rise to reverse sensitivity concerns (for example pig or poultry farming).

I would like to be heard in support of my submission

I am prepared to consider presenting a joint case at the hearing

Signed **……..** Date**: ……....**

SUBMISSION ON DRAFT WAIMAKARIRI COUNCIL TEN YEAR PLAN

UNDER CLAUSE 6 OF THE FIRST SCHEDULE TO THE RESOURCE MANAGEMENT ACT 1991

To: The Chief Executive
Waimakariri District Council
Private Bag 1005
Rangiora 7440

Name: Wally Radford
Home Address: 267 Lehmans Rd, Rangiora
Postal Address: c/- Fiona Aston Consultancy Ltd
PO Box 1435
Christchurch 8140
Telephone: 03 3322618
Fax: 03 3322619
Email: fiona.aston@xtra.co.nz

My Submission:

I seek amendments to the Waimakariri Ten Year Plan in order to make appropriate provision (including in terms of reticulated services) for rezoning and development of my properties, and those other members of my members, and potentially neighbouring properties also on the west side of Lehmans Road north of Oxford Road, as shown on the attached plans marked 'A' and 'B', for rural residential purposes.

Plan A includes the Radford family land only, and the Moore & Walter block (approximately 29 lots). Plan B incorporates all land which currently has access from Lehmans Road (approximately 94 lots).

A submission was made on the Council's Rural Residential Plan (approved June 2010) seeking that the above alternative areas be identified as preferred rural residential growth areas in the RRDP. A copy of the summary evidence is attached as Attachment C.

The Council decision on the Radford submission was as follows:-

Development in this area is likely to compromise future growth options, particularly given that the adjacent greenfields area is not yet developed.

However, given that the area inside the Urban Limit under Chapter 12A of the Canterbury Regional Policy Statement at Rangiora far exceeds the allocation of residential households to Rangiora under C12A, rural residential development here is unlikely to compromise future growth options. In addition, the existing Rangiora Airport lies to the west, and the land includes power pylons which will require a building setback. These potential constraints for higher density residential living mean the site is

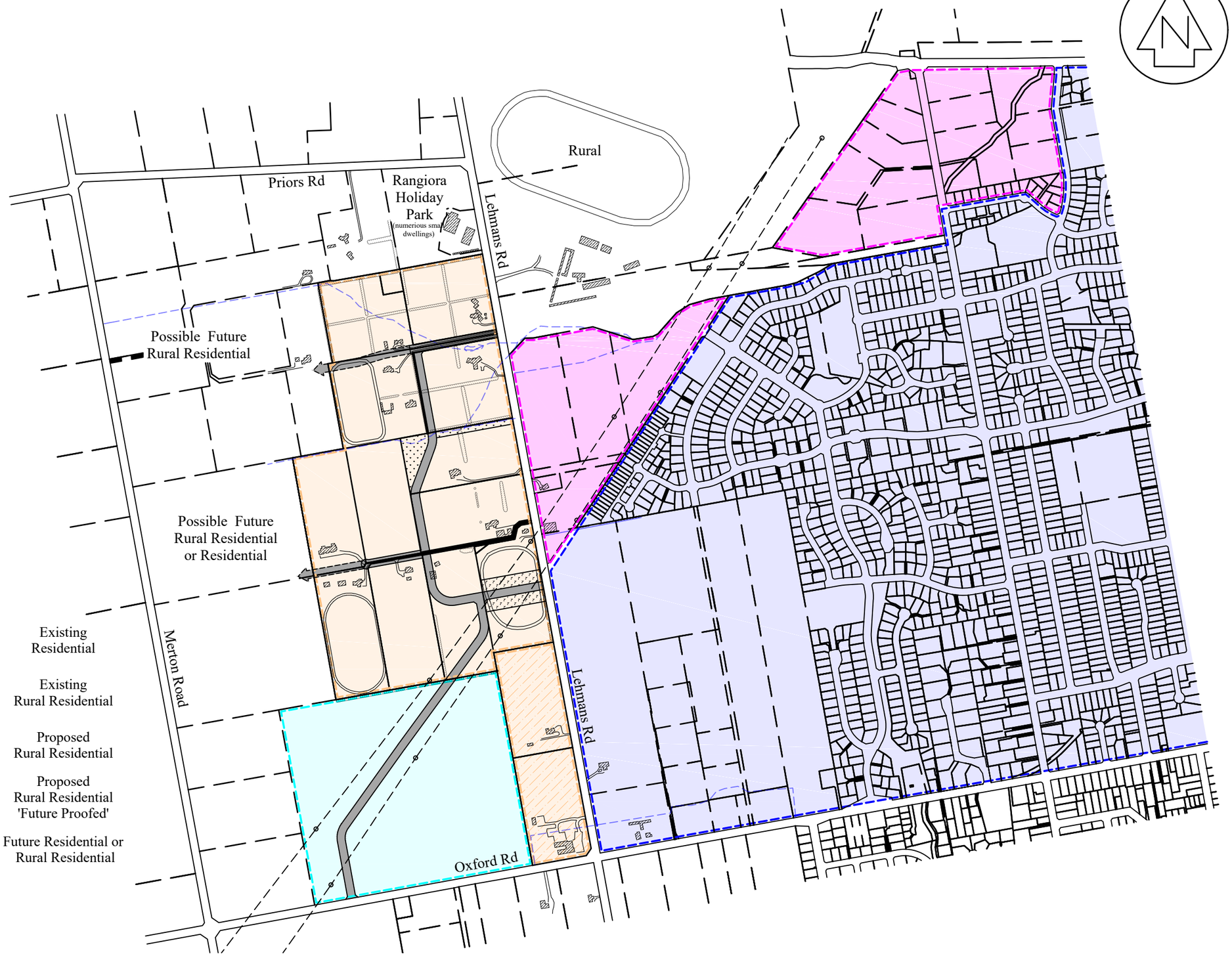
particularly suitable for lower density rural residential living. Such zoning is also compatible with the existing rural residential zoned area on the opposite side of this part of Lehmans Road.

I do wish to be heard in support of my submission. 3-5pm Wednesday 2 May or Thursday 3 May at Rangiora would be suitable.

....
Signed Date

Appendix C:

Future Growth Concept Lehmans Road north of Oxford Road



Legend

Existing Dwellings		Existing Residential
Primary Road Access		Existing Rural Residential
Possible Future Road Access TO West		Proposed Rural Residential
High Voltage Power Lines and Pylons		Proposed Rural Residential 'Future Proofed'
Water Race		Future Residential or Rural Residential
Pedestrian / Cycleway Access Reserve and Water Race		

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REV	DATE	REVISION DETAILS	
A	14/07/17	FOR DISCUSSION	A CAIN

DRAFTED SRS | VERIFIED

APPROVED

DATE

PROJECT: RANGIORA FUTURE GROWTH CONCEPT

TITLE: LEHMANS ROAD NORTH OF OXFORD ROAD

SHEET 1 OF 1

INFORMATION ONLY

PROJECT NO 13541

SCALE 1 : 10,000 (A3) | SIZE A3

DRAWING NO SC-01 | REV A

Appendix D:

Servicing Report (2010)

WAIMAKARIRI DISTRICT COUNCIL (WDC)
DRAFT RURAL RESIDENTIAL DEVELOPMENT PLAN (THE PLAN)

SUBMISSION OF W. RADFORD - LEHMANS ROAD

SERVICING PROPOSALS

1. FLOOD RISK

Figure 4 of the Plan shows that the Lehmans Road area is generally subject to low hazard flood risk from the Ashley River and, within the subject land area, there are also locations where the flood risk is undefined.

The submitter has obtained a Flood Risk Report from Ecan, dated 17 March 2010, prepared by Richard Holmes, Senior Resource Management Planner.

Mr Holmes advises that:

- The nature of the flood risk is associated with overflows from the Ashley River.
- The Ecan modelling predicts potential flood depths up to 300 mm for 1%, 0.5% and 0.2% AEP flood events on the subject land.
- The report concludes that *"mitigation of flood damage to buildings through raised platforms or floor levels is feasible".*

It is proposed that building platforms will be filled as necessary to achieve minimum floor levels above predicted flood levels plus an appropriate freeboard.

2. ACCESS AND TRAFFIC

If the larger area (ODP 1 attached to Fiona Aston's evidence) is adopted, wee estimate that, at full development, there could by up to about 50 dwellings on the subject land, which would add up to about 500 traffic movements per day onto Lehmans Road and Oxford Road. If a smaller area was adopted (ODP 2), we estimate at full development, about 20 dwellings, adding 200 traffic movements per day onto Lehmans Road and Oxford Road.

The key issues relate to intersection design. The individual intersections onto Lehmans Road from the areas to be developed will be designed and constructed in accordance with the WDC Engineering Code of Practice.

The existing intersection of Lehmans Road and Oxford Road will be the subject of a detailed engineering investigation and design, all to WDC approval.

3. SERVICES - GENERAL CONSIDERATIONS

All services to be provided for the development of the subject land will be in accordance with the WDC Engineering Code of Practice.

It is a primary objective of The Plan *"to develop sustainable, long term servicing solutions"* (page 2).

Policy 14 of Change 1 of the Canterbury Regional Policy Statement (RPS) requires that developments be located so that they can be serviced by reticulated water and wastewater systems.

The proposed services for the subject land are entirely consistent with the above approach.

The plan change and subdivision processes give ample opportunities to integrate the internal servicing of the subject land with the wider WDC servicing vision.

4. WATER SUPPLY

A reticulated water supply will be provided to all dwellings on the subject land, on a stage-by-stage basis.

It is understood that there is sufficient capacity in the Rangiora water supply system to accept additional connections.

The alternatives are:

- A connection be made to the existing Rangiora water scheme or to some other water source nominated by the WDC (perhaps Fernside).

- A stand-alone water scheme with a community water well and reticulation system. Such a scheme may be to urban standards or be a rural restricted supply. The scheme could be adopted by the WDC or run by a qualified network operator appointed by the residents.

5. WASTEWATER TREATMENT AND EFFLUENT DISPOSAL

A reticulated wastewater system will be provided to all dwellings on the subject land, on a stage-by-stage basis.

It is proposed that the internal wastewater reticulation, within the subject land, be designed to discharge to pumping stations, from which the wastewater will be pumped to an approved point of discharge to the WDC Rangiora sewerage system.

6. STORMWATER DRAINAGE AND DISCHARGES

As noted in Section 1 above, the soils under the subject land are sandy loams. In general terms, these conditions are suitable for the disposal of stormwater to the ground by soakage.

It is most likely that roof stormwater will be discharged to the ground via individual soak pits without prior treatment, as a permitted activity, under the (Canterbury Natural Resources Regional Plan (NRRP).

Stormwater generated on roads, rights of way and hardstand areas will be discharged to ground following treatment by flow along swales or through first flush treatment ponds. The discharge to ground will either be via individual soak pits or infiltration ponds.

7. SUMMARY

From the above, it is clear that the proposed development of the subject land is not constrained by the provision of appropriate and sustainable services.

Barry Fairburn – Consulting Engineer
24.03.10.

Appendix E :

Bayleys Letter

Thursday, 13 July 2017

Fiona Aston
fiona@astonconsultants.co.nz

RE: Rural Residential Subdivision, Waimakariri

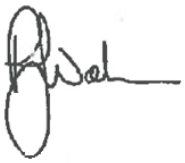
I am writing in support of the rural residential subdivision that you are proposing in close proximity to Rangiora.

Having been involved in selling lifestyle properties in the Waimakariri District for the past 10 years, I have seen a consistent growth in demand for all varieties of lifestyle properties. The most popular lifestyle properties are the ones that are located within a 5km radius of the township and its amenities.

With rapid expansion within the Waimakariri area the strong demand for rural residential lots will in our opinion continue. Whilst there is enquiry for the larger 4ha lots it is the smaller land size that is very popular for those seeking a semi-rural lifestyle property. We find many of our clients unable to manage a 4ha landholding.

If a rural residential subdivision went ahead in the location you are proposing we are completely confident that there would be an immediate response from potential purchasers and the properties would be in high demand.

Yours faithfully



Richard Woerlee
Licensed Real Estate Agent
WHALAN AND PARTNERS LTD, BAYLEYS, LICENSED UNDER THE REA ACT 2008

22 November 2021

To whom it may concern

Regarding: Proposed high end residential subdivision

I am writing in support of the high end residential subdivision that you are proposing in close proximity in Rangiora.

Having been involved in selling both residential and lifestyle properties in the Waimakariri District for the past seventeen years, I have seen a huge growth in demand for all properties, especially those with a lifestyle element close to Rangiora. For the last five years there has been a serious lack of large family sized homes (5 bed, separate office, 3 car garaging, room for pool or similar) on the traditional Kiwi quarter of an acre (1000-2000sqm section) in Rangiora. With the amount of Rangiora families that have expanded there are not enough properties of this calibre to satisfy their needs. Their preference is for their children to be able to bike/walk to local schools, they wish to remain close to the amenities of Rangiora and do not wish to have a lifestyle property of 10acres or the 5000sqm sites out in Mandeville/Ohoka.

I believe high end residential blocks of 1000-2000sqm in Rangiora have been overlooked in the plan for the growth of the area. I am aware of numerous families constantly inquiring when this issue will be resolved. After numerous requests to developers and the council, these requests appear to have been brushed aside. This is not for the Waimak as a region, this is for Rangiora as a township. Consistently developers are looking to make quick money with releasing sections between 400-700sqm, which in my view will be detrimental for the area.

I am confident that a high end residential subdivision of the proposed design and calibre would be in high demand.

Kind Regards

Lance Farrant
Licensed salesperson

Lance Farrant | 027 228 2846 | lance.farrant@bayleys.co.nz

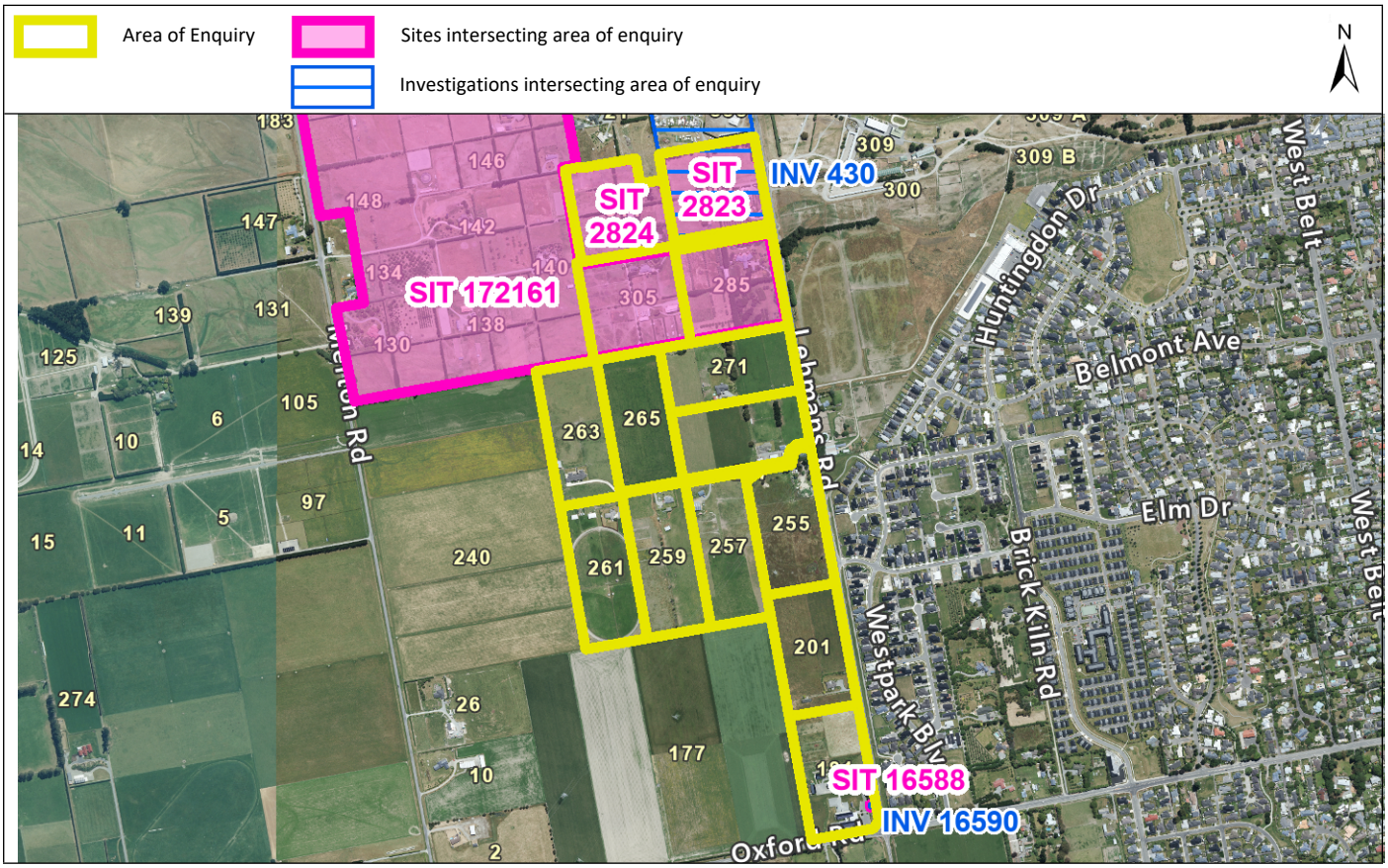
Whalan and Partners Limited Bayleys, Licensed under the REA Act 2008.
PO Box 142, Rangiora 7440, New Zealand.

Make-A-Wish NEW ZEALAND

Property Statement
from the Listed Land Use Register

Visit ecan.govt.nz/HAIL for more information or
contact Customer Services at ecan.govt.nz/contact/ and quote ENQ301028

Date generated: 22 November 2021
Land parcels: Lot 9 DP 328154
Lot 3 DP 328154
Lot 4 DP 328154
Lot 7 DP 83612
Lot 5 DP 83612
Lot 7 DP 328154
Lot 8 DP 83612
Lot 8 DP 328154
Lot 1 DP 328154
Lot 6 DP 83612
Lot 5 DP 328154
Lot 6 DP 328154
Lot 2 DP 83770
Lot 1 DP 83770
Lot 2 DP 328154



The information presented in this map is specific to the property you have selected. Information on nearby properties may not be shown on this map, even if the property is visible.

Sites at a glance

Sites within enquiry area

Site number	Name	Location	HAIL activity(s)	Category
2823	Ex North Canterbury Clay Target Club (shot fall zone3)	315 Lehmans Road, Rangiora	C2 - Gun clubs or rifle ranges;A10 - Persistent pesticide bulk storage	Unverified HAIL

			or use;	
2824	Lehmans Road Horticultural site	311 Lehmans Road, Rangiora	A10 - Persistent pesticide bulk storage or use;	Not Investigated
16588	Kippenberger Holdings Limited	118 Oxford Road, North Canterbury	A17 - Storage tanks or drums for fuel, chemicals or liquid waste;	At or below background concentrations
172161	Mertons Road, Priors Road & Lehmans Road, Rangiora	Mertons Road, Priors Road & Lehmans Road, Rangiora	C2 - Gun clubs or rifle ranges;A10 - Persistent pesticide bulk storage or use;	Not Investigated

More detail about the sites

Site 2823: Ex North Canterbury Clay Target Club (shot fall zone3) (Intersects enquiry area.)

Category: Unverified HAIL
Definition: The relevant land-use / HAIL history has not been confirmed.

Location: 315 Lehmans Road, Rangiora
Legal description(s): Lot 5 DP 83612

HAIL activity(s):

Period from	Period to	HAIL activity
1946	1985	Gun clubs or rifle ranges, including clay target clubs that use lead munitions outdoors
1985	1999	Persistent pesticide bulk storage or use including sports turfs, market gardens, orchards, glass houses or spray sheds

Notes:

5 Apr 2004 This site falls within the calculated shot fall zone of the Ex North Canterbury Clay Target Club.

Investigations:

INV 430 **Coley Park - Rangiora Canterbury**
OPUS - Detailed Site Investigation
17 Sep 1999

Summary of investigation(s):

This site covers part of the original North Canterbury Clay Target Club which was active between 1946 and 1985. The site is now operated as the Rangiora Holiday Park.

An investigation was conducted in 1999 by Opus at the adjacent Coley Park development in order to assess the potential for ground contamination. As part of this investigation, 4 soil samples were collected from the Holiday Park site, and analysed for total recoverable lead.

3 of the 4 samples collected from this site were found to have concentrations of lead exceeding the ANZECC (1992) guideline value of 300 mg/kg. This conservative guideline value is considered appropriate, especially when considering the sites current use as a holiday park, and the number of complete exposure pathways that exist.

No surface water or groundwater samples were collected from the site.

Further work is required at the site to delineate the extent of lead contamination, so that appropriate remedial options can be determined.

There are no other activities with the potential to cause contamination currently known to exist at the site.

Site 2824: Lehmans Road Horticultural site (Intersects enquiry area.)

Category: Not Investigated
Definition: Verified HAIL has not been investigated.

Location: 311 Lehmans Road, Rangiora
Legal description(s): Lot 6 DP 83612 (D)

HAIL activity(s):

Period from	Period to	HAIL activity
1985	1999	Persistent pesticide bulk storage or use including sports turfs, market gardens, orchards, glass houses or spray sheds

Notes:

20 Dec 2007 A subdivision proposal plan (Connell Wagner, October 1999) produced for Coley Park Trust indicates that olives were grown on this property.

9 Dec 2013 During an Environment Canterbury review of clay target club shot fall zones in Canterbury, the shot fall zone distance was revised from 300 m to 200m. On this basis, this site no longer falls within the ex-North Canterbury shot fall zone, and activity record # 3108 (for clay target clubs) has been removed from the site.The site is still listed on the LLUR for its former horticultural land use; however the site name has been changed from Ex-North Canterbury Clay Target Club (Shot fall zone 4).

Investigations:

There are no investigations associated with this site.

Site 16588: Kippenberger Holdings Limited (Intersects enquiry area.)

Category: At or below background concentrations
Definition: Investigation results demonstrate that all hazardous substances are at or below regional background levels.

Location: 118 Oxford Road, North Canterbury
Legal description(s): Lot 2 DP 83770

HAIL activity(s):

Period from	Period to	HAIL activity
Unknown	2 May 2013	Storage tanks or drums for fuel, chemicals or liquid waste

Notes:

27 May 2013 A 1,350 Litre underground storage tank and associated pipework was removed from 118 Oxford Road, Fernside, Rangiora in May 2013. Source: PDP Site Inspection Report, May 2013

Investigations:

INV 16590 **INV16590 - Site Inspection for the removal of an underground storage tank at 118 Oxford Road, Fernside, Rangiora**
Pattle Delamore Partners Ltd - Detailed Site Investigation
13 May 2013

Summary of investigation(s):

The land which holds the site is located at 118 Oxford Road, Fernside, in a Rangiora rural zone and is comprised of vacant paddocks (with a house), large sheds and outbuildings (in the south-eastern corner). A change of land use from rural to commercial/industrial has been proposed and veterinary centre is expected to be established there

In May 2013, Pattle Delamore Partners Ltd completed a site inspection on behalf of Cook Brothers Contracting Limited for the removal of an underground storage tank (UST) at the site. The aim of the investigation was to assess the possibility environmental impacts or contamination resulting from petroleum hydrocarbon residues.

The storage tank system, which was comprised of a 1,350 litre motor spirits UST, fuel pump and associated pipework was located on a small area in the south-eastern corner of the site. The tank was removed on 02/05/2013 by Cook Brothers under the direction of Petrotech Services Limited and stated to be in good condition with minimal rusting.

A total of 8 soil samples were collected and analysed for total petroleum hydrocarbons and individual BTEX (benzene, toluene, ethylbenzene and total xylene) compounds. One soil sample was collected from each wall and the base of the UST pit. One soil sample was collected from the spoil heap, and one from the bedding of the supply pipe and fuel pump, respectively.

TPH and BTEX compound were below laboratory detection limits.

The investigation of the decommissioned UST was adequate and no further work is required.

The category proposed for the portion of the site addressed by the Pattle Delamore Partners investigation is “At or below background concentrations”.

Site 172161: Mertons Road, Priors Road & Lehmans Road, Rangiora (Intersects enquiry area.)

Category: Not Investigated
Definition: Verified HAIL has not been investigated.

Location: Mertons Road, Priors Road & Lehmans Road, Rangiora
Legal description(s): Lot 1 DP 68030,Lot 1 DP 83612,Lot 10 DP 83612,Lot 11 DP 83612,Lot 12 DP 83612,Lot 13 DP 83612,Lot 14 DP 83612,Lot 2 DP 83612,Lot 3 DP 83612,Lot 7 DP 83612,Lot 8 DP 83612,Lot 9 DP 83612

HAIL activity(s):

Period from	Period to	HAIL activity
1946	1985	Gun clubs or rifle ranges, including clay target clubs that use lead munitions outdoors
1994	1995	Persistent pesticide bulk storage or use including sports turfs, market gardens, orchards, glass houses or spray sheds

Notes:

10 Feb 2017	This record was created as part of the Waimakariri District Council 2016 HAIL identification project.
27 Jul 2017	Survey Response: Current owner had no knowledge of prior land use
	Survey Property Address: 142 Merton Road
	Survey Response File: C17C/113845
27 Jul 2017	Survey Response: Cuprofix used on fruit trees and olives. Historically apple orchard also.
	Survey Property Address: 75 Priors Road
	Survey Response File: C17C/112954
27 Jul 2017	Survey Response: Current owner purchased 2014. No knowledge of prior spray regime indicated
	Survey Property Address: 138 Merton Road
	Survey Response File: C17C/118691
27 Jul 2017	Survey Response: No knowledge of spray regime at former orchard (believed copper may have been used)
	Survey Property Address: 55 Priors Road
	Survey Response File: C17C/114643
27 Jul 2017	Survey Response: Current owner purchased in 2006. No knowledge of prior spray regime
	Survey Property Address: 140 Merton Road
	Survey Response File: C17C/112913
27 Jul 2017	Survey Response: Current owner purchased 2000. No knowledge of prior spray regimes
	Survey Property Address: 130 Merton Road
	Survey Response File: C17C/112934
27 Jul 2017	Survey Response: Current owner purchased in 2012 - currently do not have a spray regime. No knowledge of spray regime in 1994-95
	Survey Property Address: 134 Merton Road
	Survey Response File: C17C/115120
21 Aug 2017	Area defined from 1994 to 1995 aerial photographs. A10 - Persistent pesticide bulk storage or use was noted in aerial photographs reviewed.

Investigations:

There are no investigations associated with this site.

Disclaimer

The enclosed information is derived from Environment Canterbury’s Listed Land Use Register and is made available to you under the Local Government Official Information and Meetings Act 1987.

The information contained in this report reflects the current records held by Environment Canterbury regarding the activities undertaken on the site, its possible contamination and based on that information, the categorisation of the site. Environment Canterbury has not verified the accuracy or completeness of this information. It is released only as a copy of Environment Canterbury's records and is not intended to provide a full, complete or totally accurate assessment of the site. It is provided on the basis that Environment Canterbury makes no warranty or representation regarding the reliability, accuracy or completeness of the information provided or the level of contamination (if any) at the relevant site or that the site is suitable or otherwise for any particular purpose. Environment Canterbury accepts no responsibility for any loss, cost, damage or expense any person may incur as a result of the use, reference to or reliance on the information contained in this report.

Any person receiving and using this information is bound by the provisions of the Privacy Act 1993.

	Restructure DEV-PRD-R2 as a standard and delete reference to built form standards. Include an amended Advisory Note
FRD - Fawcetts Road Development Area	Amend wording of the 'Introduction' Amend the format of DEV-ADA-R1. Include an amended Advisory Note. Delete reference to build form standards. Restructure standards so prior approval of Council is not required. Delete DEV-ADA-BFS4 Transmission Lines

36. We note that in reviewing the Development Areas we have also recommended minor grammatical edits to some of the descriptive text.

3. Rezonings recommended to be rejected by the s42A report author

37. We record our general agreement with the s42A report author's recommendations to reject submissions seeking rezoning.

38. However, we do disagree with his recommendation to reject the submissions seeking amendments to the Mill Road Ōhoka Development Area provisions and associated ODP. We address this below. We also consider it appropriate that we provide additional comment in relation to a large number of rezoning requests for the Swannanoa/Mandeville area, given the significant amount of evidence and legal submissions we heard from submitters in that area.

39. Before we discuss these two matters below, we must also briefly comment on the s42A report author's recommendations in relation to the Tapp[10] submission for 3025 Oxford Road and the Allaway and Larsen[11] submission for Lehmans Road, Fernside.

40. With respect to the Tapp submission, the s42A report author recommended rejecting the submission to extend the LLRZ Overlay to an adjoining property owned by the submitter. That recommendation was on the basis of the property being affected by the Starvation Hill Fault avoidance overlay and flood hazard constraints. As a consequence of these issues, he also recommended that the existing LLRZ Overlay be removed from the property.

41. The Panel does not agree with this recommendation as there is simply no scope to make such a change. Neither the submitter nor any other party requested that the Overlay be removed. We do however recommend that the submitter's request be rejected.

[10] 37
[11] 236

42. Turning to the Allaway and Larsen submission, the s42A report author recommended rejecting this zoning request on the basis that no technical information was provided in respect to servicing and hazard constraints. He highlighted in his report that the property *"was previously considered in the RRDS and was excluded from inclusion as it was outside of the infrastructure boundary and could potentially foreclose the ability of Rangiora to expand out to the west."* In his reply report, Mr Buckley noted his agreement, in part, with Ms Ashton's assessment of the NPS-UD and suggested that we consider the option of extending the LLRZ Overlay across the property, for which there was scope within the submission.

43. The Panel is not comfortable with this approach given the site's strategic location on the boundary of Rangiora. While it is currently outside the infrastructure boundary, further investigation may identify this site as more suitable for higher density urban development as opposed to low density, large lot residential development. We recommend that a more strategic approach be taken to the future use of this land. At this point in time, however, we recommend the submission be rejected.

MILL - Mill Road, Ōhoka Development Area

44. The submissions we address here are from the following Mill Road properties owners at Ōhoka:
- MacRae Land Company[12]
- Ngaire Wilkinson[13]
- Laurie and Pamela Richards,[14] and
- Reece Macdonald[15].

45. These submitters sought changes to the MILL - Mill Road Ōhoka Development Area provisions and ODP (created under PC17) as opposed to a new zoning. In summary, changes sought were as follows:
- Replace Density Area A located within the centre of the ODP area, specifically over 38 Kintyre Lane, with Density Area B. This would enable allotments within the centre of the ODP area to be a minimum size of 2,500m^2 (as discussed further below), rather than 1ha.
- Reduce the minimum allotment size for Density Area B from 4,000m^2 to 2,500m^2. No changes are proposed to the maximum number of allotments (81) or minimum allotment size for Density Area A (1ha) or the minimum average allotment size (5,000m^2).
- Remove "character street with landscaping & planting provisions" from the MILL provisions.
- Provide a new Local Road with potential primary pedestrian and cycle route connecting from the rear of the ODP area through 53 Threlkelds Road to Threlkelds Road.

[12] 409.1 to 409.3
[13] 23.1
[14] 289.1, 289.2 and 289.3
[15] 308.1 – 308.3

TRIM: 221118200688 / DDS-14-04

Waimakariri District Council
215 High Street
Private Bag 1005
Rangiora 7440, New Zealand
Phone 0800 965 468

DEVELOPMENT PLANNING

Further Submission Form

Further submissions close on Monday, 21 November 2022 at 5pm.

I/we are further submitting on:

☑ **Proposed District Plan** ☐ **Variation 1: Housing Intensification** ☐ **Variation 2: Financial Contributions**

Please use a separate form for each consultation.

Clause 8 of Schedule 1, Resource Management Act 1991

To: Waimakariri District Council

Further submitter details

Name of further submitter: D[redacted] & S[redacted] Elley

Organisation name and contact (if representing a group or organisation): _____

[redacted]

Email: damanelley@outlook.com Phone: [redacted]

Only certain persons can make a further submission. Please select the option that applies to you.

I am:

☐ a person representing a relevant aspect of the public interest

☑ a person who has an interest in the proposal that is greater than the interest the general public has

☐ the local authority for the relevant area

Please explain why you come within the category selected above:

Affected landowner

Hearing options

I wish to be heard in support of my further submission? ☑ Yes ☐ No

[redacted] with them at a hearing. ☑ Yes ☐ No

Date: 17/11/22

PLEASE NOTE - *A signature is not required if you submit this form electronically. By entering your name in the box below you are giving your authority for this application to proceed.*

Name of person making further submission: D[redacted] + C[redacted] Elley

This further submission is in relation to the original submission of: *Enter the details of the original submitter:* • *name, address or email; and* • *submission number (and point(s), if applicable)*	The particular parts of the original submission I/we support /oppose are:	My/our position on the original submission is: *Support or oppose*	The reasons for my/our support/ opposition to the original submission are:	Allow or disallow the original submission (in full or in part)	Give precise details of why you wish to allow/disallow (in full or in part) to indicate the decision you want Council to make
Rick Allaway and Lionel Larsen C/o Aston Consultants P.O. Box 1435, Christchurch (Ph 03 332-2618) Submission number: 236	Refer attached	Support	Refer attached	Refer attached	Refer attached

TRIM: 221118200688 / DDS-14-04

TRIM: 221118200688 / DDS-14-04

The particular parts of the original submission I/we support/oppose are:

This further submission is in support of original submitters Rick Allaway and Lionel Larsen (c/o Aston Consultants, Submission No. 236) amending the planning map to enable the submitters' request to re-zone thirteen Lehmans Road 4Ha blocks from Rural Lifestyle Zone (RLZ) to Large Lot Residential Zone (LLRZ).

We support amending the planning map and Submission 236 to include 140 Merton Road and other properties more or less contiguous with it and with the original submitters' properties, across to the eastern side of Merton Road. This further submission is separately supported by other property owners making up a contiguous area from Lehmans Rd to Merton Rd.

The reasons for my/our support/opposition to the original submission are:

The further submitters believe there are compelling reasons for extending the original submitters' proposed LLRZ from Lehmans Rd to Merton Rd:

1) Like the original submitters', the further submitters' properties are part of a contiguous strip of 4ha blocks between Merton Rd and the western side of Lehmans Rd. The eastern side of Lehmans Rd is zoned Residential and Rural Residential and is the notional limit of Rangiora's westward urban residential spread.
2) The further submitters' 4ha blocks are located on the western edge of urban Rangiora within the Large Lot Residential Zone (LLRZ) overlay, an area designated on the submitters' Survus plan SC-01 for future intensive urban development.
3) There is also a large contiguous block fronting Oxford Road that is marked on the Survus plan SC-01 for Future Residential or Future Rural Residential, providing a degree of precedent for smaller residential blocks between Merton Rd and Lehmans Rd.
4) The submitters' and further submitters' proposal would allow zone-limited in-fill housing within the Lehmans Road, Oxford Road, Merton Road and Priors Road block without sacrificing its essentially rural atmosphere.
5) There is an unformed road tentatively marked through the submitters' and further submitters' properties from Lehmans Road to Merton Road which may be facilitated by the further submitters' proposals.
6) Both the original and further proposal make use of existing and planned transport infrastructure and waste water system.
7) Together the original and further proposals allow for a rural ambience to be sustained on a smaller block of land than 4ha, adjacent to an existing urban environment to promote a coordinated pattern of development.
8) The properties involved in both the original and further submissions are 4ha blocks in a Rural Lifestyle Zone, which seems incongruous in immediate proximity to Rangiora residential zones.
9) There is no obvious economic basis to maintaining the 4ha Rural Lifestyle zoning between Merton Rd and Lehmans Rd, because they are generally too small to support pastoral or arable farming, and involve considerable cost in their upkeep.
10) The further submitters want to be able to downsize their properties to reduce the cost of maintaining them, and because they have no economic use for most of the land.

[redacted]

TRIM: 221118200688 / DDS-14-04

11) The original and further submissions, if accepted, would greatly increase the number of large residential sections on a persistently under-supplied market, thereby helping minimise the further sub-division of productive farmland.
12) The infrastructure – water and sewerage – to service the proposed large residential blocks already exists on the other side of Lehmans Road, minimising the connection costs.
13) The original and further submitters' proposals are appropriate and necessary to achieve the sustainable growth and development of Rangiora, given that the current supply of 800 vacant lots in Rangiora is expected to last only four years.
14) Both proposals cater to an unmet and strong demand for residential sections in Rangiora big enough for a large house and accompanying garaging, outbuildings and swimming pools close to Rangiora's amenities and within walking or cycling distance of local schools. For these buyers the 4ha lifestyle block is too large and unmanageable to meet their needs.
15) No additional cost will accrue to the council in re-zoning the submitters' and further submitters' land because there is adequate capacity in the public utilities and existing road networks, including planned upgrades.
16) Both proposals support the council's strategic approach to the provision of Rural Residential Land (presently zoned LLRZ in the PWDP) to create new residential areas, with a secondary focus on enabling intensification into Large Residential lots within existing rural fringe areas where there is sufficient community support and servicing available.
17) There is no danger of the submitters' proposals creating reverse sensitivity issues with adjoining land users, and specifically that of the Rangiora Racecourse which is more than 500m away at the nearest point.
18) The proposals are not intended to provide a staged development towards full urban intensification, which is otherwise catered for to the east of Rangiora, but to provide a unique residential environment to the west that can stand alone and contribute to the urban fabric of Rangiora.
19) The proposals will contribute to a wider range of housing types in Rangiora, and boost competition in the Rangiora housing and land markets.
20) The area, which is mostly flat, contains no wet-lands or lakes, though the Ashley River lies to the north, and as an inland site appears to face no specific climate change effects or issues.

Allow or disallow the original submission (in full or in part):

We support allowing the original submission to the extent that it does not contradict this further submission.

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

1) The proposed re-zoning will help meet a strong and under-supplied market for small rural holdings (less than 4ha) that seems not to be otherwise catered for in the proposed district plan.
2) The proposed re-zoning would help Rangiora deal with an impending shortage of building sections while making no further demands on the land supply.
3) The proposed re-zoning is in line with the principles driving recent and pending central government legislation.

[redacted]

TRIM: 221118200688 / DDS-14-04

4) The re-zoning will not involve significant council expenditure given that the requisite transport and infrastructure services are already in place, just across the road.
5) The re-zoning will have no significant environmental impact and create no reverse sensitivity issues.

[redacted]

TRIM: 221118200688 / DDS-14-04

Note

A copy of your further submission must be served on the original submitter within 5 working days after it is served on the Waimakariri District Council. Contact details for all submitters can be found on the Waimakariri District Council website, at waimakariri.govt.nz/planning/district-plan.

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

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

Privacy Act 1993

Please note information on this form and the content of your submission will be made publicly available as part of the decision-making process.

This form is in the format required by Form 6 of the Resource Management (Forms, Fees and Procedure) Regulations 2003.

Further submissions close on Monday, 21 November 2022 at 5pm.

Returning this form

You can:

- Email it to: developmentplanning@wmk.govt.nz - Subject line: Further Submission
- Post it to: Waimakariri District Council, Private Bag 1005, Rangiora 7440
- Deliver it to a Council Service Centre in Rangiora, Kaiapoi or Oxford

[redacted]

TRIM: 221118200694 / DDS-14-04

Waimakariri District Council
215 High Street
Private Bag 1005
Rangiora 7440, New Zealand
Phone 0800 965 468

DEVELOPMENT PLANNING

Further Submission Form

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I/we are further submitting on:

☑ **Proposed District Plan** ☐ **Variation 1: Housing Intensification** ☐ **Variation 2: Financial Contributions**

Please use a separate form for each consultation.

Clause 8 of Schedule 1, Resource Management Act 1991

To: Waimakariri District Council

Further submitter details

Name of further submitter: Kim Manson e Neinana Kuru

Organisation name and contact (if representing a group or organisation): _____

Postal address/Address for service: 138 Merton Road Postcode: 7471

Email: kimmanson88@hotmail.com Phone: 021 0593106

Only certain persons can make a further submission. Please select the option that applies to you.

I am:

☐ a person representing a relevant aspect of the public interest

☑ a person who has an interest in the proposal that is greater than the interest the general public has

☐ the local authority for the relevant area

Please explain why you come within the category selected above:

Affected landowner

Hearing options

I wish to be heard in support of my further submission? ☑ Yes ☐ No

If others make a similar further submission I will consider presenting a joint case with them at a hearing. ☑ Yes ☐ No

Signature: _____ Date: 17/11/2022

(of person making submission or person authorised to make decision on behalf)

PLEASE NOTE - *A signature is not required if you submit this form electronically. By entering your name in the box below you are giving your authority for this application to proceed.*

KM NK

Name of person making further submission: Kim Manson & Nerissa Kwa

This further submission is in relation to the original submission of: *Enter the details of the original submitter: • name, address or email; and • submission number (and point(s), if applicable)*	The particular parts of the original submission I/we support /oppose are:	My/our position on the original submission is: *Support or oppose*	The reasons for my/our support/ opposition to the original submission are:	Allow or disallow the original submission (in full or in part)	Give precise details of why you wish to allow/disallow (in full or in part) to indicate the decision you want Council to make
Rick Allaway and Lionel Larsen C/o Aston Consultants P.O. Box 1435, Christchurch (Ph 03 332-2618) Submission number: 236	Refer attached	Support	Refer attached	Refer attached	Refer attached

KM
NK

TRIM: 221118200694 / DDS-14-04

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The particular parts of the original submission I/we support/oppose are:

This further submission is in support of original submitters Rick Allaway and Lionel Larsen (c/o Aston Consultants, Submission No. 236) amending the planning map to enable the submitters' request to re-zone thirteen Lehmans Road 4Ha blocks from Rural Lifestyle Zone (RLZ) to Large Lot Residential Zone (LLRZ).

We support amending the planning map and Submission 236 to include 138 Merton Road and other properties more or less contiguous with it and with the original submitters' properties, across to the eastern side of Merton Road. This further submission is separately supported by other property owners making up a contiguous area from Lehmans Rd to Merton Rd.

The reasons for my/our support/opposition to the original submission are:

The further submitters believe there are compelling reasons for extending the original submitters' proposed LLRZ from Lehmans Rd to Merton Rd:

1) Like the original submitters', the further submitters' properties are part of a contiguous strip of 4ha blocks between Merton Rd and the western side of Lehmans Rd. The eastern side of Lehmans Rd is zoned Residential and Rural Residential and is the notional limit of Rangiora's westward urban residential spread.
2) The further submitters' 4ha blocks are located on the western edge of urban Rangiora within the Large Lot Residential Zone (LLRZ) overlay, an area designated on the submitters' Survus plan SC-01 for future intensive urban development.
3) There is also a large contiguous block fronting Oxford Road that is marked on the Survus plan SC-01 for Future Residential or Future Rural Residential, providing a degree of precedent for smaller residential blocks between Merton Rd and Lehmans Rd.
4) The submitters' and further submitters' proposal would allow zone-limited in-fill housing within the Lehmans Road, Oxford Road, Merton Road and Priors Road block without sacrificing its essentially rural atmosphere.
5) There is an unformed road tentatively marked through the submitters' and further submitters' properties from Lehmans Road to Merton Road which may be facilitated by the further submitters' proposals.
6) Both the original and further proposal make use of existing and planned transport infrastructure and waste water system.
7) Together the original and further proposals allow for a rural ambience to be sustained on a smaller block of land than 4ha, adjacent to an existing urban environment to promote a coordinated pattern of development.
8) The properties involved in both the original and further submissions are 4ha blocks in a Rural Lifestyle Zone, which seems incongruous in immediate proximity to Rangiora residential zones.
9) There is no obvious economic basis to maintaining the 4ha Rural Lifestyle zoning between Merton Rd and Lehmans Rd, because they are generally too small to support pastoral or arable farming, and involve considerable cost in their upkeep.
10) The further submitters want to be able to downsize their properties to reduce the cost of maintaining them, and because they have no economic use for most of the land.

KM NK

TRIM: 221118200694 / DDS-14-04

11) The original and further submissions, if accepted, would greatly increase the number of large residential sections on a persistently under-supplied market, thereby helping minimise the further sub-division of productive farmland.
12) The infrastructure – water and sewerage – to service the proposed large residential blocks already exists on the other side of Lehmans Road, minimising the connection costs.
13) The original and further submitters' proposals are appropriate and necessary to achieve the sustainable growth and development of Rangiora, given that the current supply of 800 vacant lots in Rangiora is expected to last only four years.
14) Both proposals cater to an unmet and strong demand for residential sections in Rangiora big enough for a large house and accompanying garaging, outbuildings and swimming pools close to Rangiora's amenities and within walking or cycling distance of local schools. For these buyers the 4ha lifestyle block is too large and unmanageable to meet their needs.
15) No additional cost will accrue to the council in re-zoning the submitters' and further submitters' land because there is adequate capacity in the public utilities and existing road networks, including planned upgrades.
16) Both proposals support the council's strategic approach to the provision of Rural Residential Land (presently zoned LLRZ in the PWDP) to create new residential areas, with a secondary focus on enabling intensification into Large Residential lots within existing rural fringe areas where there is sufficient community support and servicing available.
17) There is no danger of the submitters' proposals creating reverse sensitivity issues with adjoining land users, and specifically that of the Rangiora Racecourse which is more than 500m away at the nearest point.
18) The proposals are not intended to provide a staged development towards full urban intensification, which is otherwise catered for to the east of Rangiora, but to provide a unique residential environment to the west that can stand alone and contribute to the urban fabric of Rangiora.
19) The proposals will contribute to a wider range of housing types in Rangiora, and boost competition in the Rangiora housing and land markets.
20) The area, which is mostly flat, contains no wet-lands or lakes, though the Ashley River lies to the north, and as an inland site appears to face no specific climate change effects or issues.

Allow or disallow the original submission (in full or in part):

We support allowing the original submission to the extent that it does not contradict this further submission.

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

1) The proposed re-zoning will help meet a strong and under-supplied market for small rural holdings (less than 4ha) that seems not to be otherwise catered for in the proposed district plan.
2) The proposed re-zoning would help Rangiora deal with an impending shortage of building sections while making no further demands on the land supply.
3) The proposed re-zoning is in line with the principles driving recent and pending central government legislation.

KM NK

TRIM: 221118200694 / DDS-14-04

4) The re-zoning will not involve significant council expenditure given that the requisite transport and infrastructure services are already in place, just across the road.
5) The re-zoning will have no significant environmental impact and create no reverse sensitivity issues.

KM NK

TRIM: 221118200694 / DDS-14-04

Note

A copy of your further submission must be served on the original submitter within 5 working days after it is served on the Waimakariri District Council. Contact details for all submitters can be found on the Waimakariri District Council website, at waimakariri.govt.nz/planning/district-plan.

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

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

Privacy Act 1993

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Returning this form

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- Deliver it to a Council Service Centre in Rangiora, Kaiapoi or Oxford

ICM NK

TRIM: 221118200698 / DDS-14-04

Waimakariri District Council
215 High Street
Private Bag 1005
Rangiora 7440, New Zealand
Phone 0800 965 468

DEVELOPMENT PLANNING

Further Submission Form

Further submissions close on Monday, 21 November 2022 at 5pm.

I/we are further submitting on:

☑ **Proposed District Plan** ☐ **Variation 1: Housing Intensification** ☐ **Variation 2: Financial Contributions**

Please use a separate form for each consultation.

Clause 8 of Schedule 1, Resource Management Act 1991

To: Waimakariri District Council

Further submitter details

Name of further submitter: Ross Fraser

Organisation name and contact (if representing a group or organisation):

A.R. & M. FRASER FAMILY TRUST

Postal address/Address for service: 130 Merton Rd RD 1 Rangiora Postcode: 7471

Email: nzarhmfraser@kinect.co.nz Phone: 3131557

Only certain persons can make a further submission. Please select the option that applies to you.

I am:

☐ a person representing a relevant aspect of the public interest

☑ a person who has an interest in the proposal that is greater than the interest the general public has

☐ the local authority for the relevant area

Please explain why you come within the category selected above:

Affected landowner

Hearing options

I wish to be heard in support of my further submission? ☑ Yes ☐ No

If others make a similar further submission I will consider presenting a joint case with them at a hearing. ☑ Yes ☐ No

Signature: [signature] Date: 18th Nov

(of person making submission or person authorised to make decision on behalf)

PLEASE NOTE - *A signature is not required if you submit this form electronically. By entering your name in the box below you are giving your authority for this application to proceed.*

Name of person making further submission: Ross Fraser.

This further submission is in relation to the original submission of: *Enter the details of the original submitter: • name, address or email; and • submission number (and point(s), if applicable)*	The particular parts of the original submission I/we support /oppose are:	My/our position on the original submission is: *Support or oppose*	The reasons for my/our support/ opposition to the original submission are:	Allow or disallow the original submission (in full or in part)	Give precise details of why you wish to allow/disallow (in full or in part) to indicate the decision you want Council to make
Rick Allaway and Lionel Larsen C/o Aston Consultants P.O. Box 1435, Christchurch (Ph 03 332-2618) Submission number: 236	Refer attached	Support	Refer attached	Refer attached	Refer attached

TRIM: 221118200698 / DDS-14-04

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This further submission is in support of original submitters Rick Allaway and Lionel Larsen (c/o Aston Consultants, Submission No. 236) amending the planning map to enable the submitters' request to re-zone thirteen Lehmans Road 4Ha blocks from Rural Lifestyle Zone (RLZ) to Large Lot Residential Zone (LLRZ).

We support amending the planning map and Submission 236 to include 130 Merton Road and other properties more or less contiguous with it and with the original submitters' properties, across to the eastern side of Merton Road. This further submission is separately supported by other property owners making up a contiguous area from Lehmans Rd to Merton Rd.

The reasons for my/our support/opposition to the original submission are:

The further submitters believe there are compelling reasons for extending the original submitters' proposed LLRZ from Lehmans Rd to Merton Rd:

1) Like the original submitters', the further submitters' properties are part of a contiguous strip of 4ha blocks between Merton Rd and the western side of Lehmans Rd. The eastern side of Lehmans Rd is zoned Residential and Rural Residential and is the notional limit of Rangiora's westward urban residential spread.
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6) Both the original and further proposal make use of existing and planned transport infrastructure and waste water system.
7) Together the original and further proposals allow for a rural ambience to be sustained on a smaller block of land than 4ha, adjacent to an existing urban environment to promote a coordinated pattern of development.
8) The properties involved in both the original and further submissions are 4ha blocks in a Rural Lifestyle Zone, which seems incongruous in immediate proximity to Rangiora residential zones.
9) There is no obvious economic basis to maintaining the 4ha Rural Lifestyle zoning between Merton Rd and Lehmans Rd, because they are generally too small to support pastoral or arable farming, and involve considerable cost in their upkeep.
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TRIM: 221118200698 / DDS-14-04

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20) The area, which is mostly flat, contains no wet-lands or lakes, though the Ashley River lies to the north, and as an inland site appears to face no specific climate change effects or issues.

Allow or disallow the original submission (in full or in part):

We support allowing the original submission to the extent that it does not contradict this further submission.

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

1) The proposed re-zoning will help meet a strong and under-supplied market for small rural holdings (less than 4ha) that seems not to be otherwise catered for in the proposed district plan.
2) The proposed re-zoning would help Rangiora deal with an impending shortage of building sections while making no further demands on the land supply.
3) The proposed re-zoning is in line with the principles driving recent and pending central government legislation.

TRIM: 221118200698 / DDS-14-04

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TRIM: 221118200698 / DDS-14-04

Note

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TRIM: 221118200700 / DDS-14-04

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215 High Street
Private Bag 1005
Rangiora 7440, New Zealand
Phone 0800 965 468

DEVELOPMENT PLANNING

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I/we are further submitting on:

☑ **Proposed District Plan** ☐ **Variation 1: Housing Intensification** ☐ **Variation 2: Financial Contributions**

Please use a separate form for each consultation.

Clause 8 of Schedule 1, Resource Management Act 1991

To: Waimakariri District Council

Further submitter details

Name of further submitter: L.N.R. de Lacy

Organisation name and contact (if representing a group or organisation):

Postal address/Address for service: 142 MERTON ROAD Postcode: 7471

Email: hdelacy@xtra.co.nz Phone: 027310610

Only certain persons can make a further submission. Please select the option that applies to you.

I am:

☐ a person representing a relevant aspect of the public interest

☑ a person who has an interest in the proposal that is greater than the interest the general public has

☐ the local authority for the relevant area

Please explain why you come within the category selected above:

Affected landowner

Hearing options

I wish to be heard in support of my further submission? ☑ Yes ☐ No

If others make a similar further submission I will consider presenting a joint case with them at a hearing. ☑ Yes ☐ No

Signature: L de Lacy Date: 17/11/2022

(of person making submission or person authorised to make decision on behalf)

PLEASE NOTE - *A signature is not required if you submit this form electronically. By entering your name in the box below you are giving your authority for this application to proceed.*

Name of person making further submission: ROCHE DE CACY

This further submission is in relation to the original submission of: *Enter the details of the original submitter:* *• name, address or email; and* *• submission number (and point(s), if applicable)*	The particular parts of the original submission I/we support /oppose are:	My/our position on the original submission is: *Support or oppose*	The reasons for my/our support/ opposition to the original submission are:	Allow or disallow the original submission (in full or in part)	Give precise details of why you wish to allow/disallow (in full or in part) to indicate the decision you want Council to make
Rick Allaway and Lionel Larsen C/o Aston Consultants P.O. Box 1435, Christchurch (Ph 03 332-2618) Submission number: 236	Refer attached	Support	Refer attached	Refer attached	Refer attached

TRIM: 221118200700 / DDS-14-04

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We support amending the planning map and Submission 236 to include 142 Merton Road and other properties more or less contiguous with it and with the original submitters' properties, across to the eastern side of Merton Road. This further submission is separately supported by other property owners making up a contiguous area from Lehmans Rd to Merton Rd.

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TRIM: 221118200700 / DDS-14-04

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TRIM: 221118200700 / DDS-14-04

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TRIM: 221118200701 / DDS-14-04

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Private Bag 1005
Rangiora 7440, New Zealand
Phone 0800 965 468

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☑ **Proposed District Plan** ☐ **Variation 1: Housing Intensification** ☐ **Variation 2: Financial Contributions**

Please use a separate form for each consultation.

Clause 8 of Schedule 1, Resource Management Act 1991

To: Waimakariri District Council

Further submitter details

Name of further submitter: [redacted] Marriott

Organisation name and contact (if representing a group or organisation): _____

[redacted]

Email: remarriott@gmail.com. Phone: [redacted]

Only certain persons can make a further submission. Please select the option that applies to you.

I am:

☐ a person representing a relevant aspect of the public interest

☑ a person who has an interest in the proposal that is greater than the interest the general public has

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Affected landowner

Hearing options

I wish to be heard in support of my further submission? ☑ Yes ☐ No

If others make a similar further submission I will consider presenting a joint case with them at a hearing. ☑ Yes ☐ No

[redacted]

PLEASE NOTE - *A signature is not required if you submit this form electronically. By entering your name in the box below you are giving your authority for this application to proceed.*

Name of person making further submission: [redacted] Marriott

This further submission is in relation to the original submission of: *Enter the details of the original submitter: • name, address or email; and • submission number (and point(s), if applicable)*	The particular parts of the original submission I/we support /oppose are:	My/our position on the original submission is: *Support or oppose*	The reasons for my/our support/ opposition to the original submission are:	Allow or disallow the original submission (in full or in part)	Give precise details of why you wish to allow/disallow (in full or in part) to indicate the decision you want Council to make
Rick Allaway and Lionel Larsen C/o Aston Consultants P.O. Box 1435, Christchurch (Ph 03 332-2618) Submission number: 236	Refer attached	Support	Refer attached	Refer attached	Refer attached

[redacted]

TRIM: 221118200701 / DDS-14-04

TRIM: 221118200701 / DDS-14-04

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3) There is also a large contiguous block fronting Oxford Road that is marked on the Survus plan SC-01 for Future Residential or Future Rural Residential, providing a degree of precedent for smaller residential blocks between Merton Rd and Lehmans Rd.
4) The submitters' and further submitters' proposal would allow zone-limited in-fill housing within the Lehmans Road, Oxford Road, Merton Road and Priors Road block without sacrificing its essentially rural atmosphere.
5) There is an unformed road tentatively marked through the submitters' and further submitters' properties from Lehmans Road to Merton Road which may be facilitated by the further submitters' proposals.
6) Both the original and further proposal make use of existing and planned transport infrastructure and waste water system.
7) Together the original and further proposals allow for a rural ambience to be sustained on a smaller block of land than 4ha, adjacent to an existing urban environment to promote a coordinated pattern of development.
8) The properties involved in both the original and further submissions are 4ha blocks in a Rural Lifestyle Zone, which seems incongruous in immediate proximity to Rangiora residential zones.
9) There is no obvious economic basis to maintaining the 4ha Rural Lifestyle zoning between Merton Rd and Lehmans Rd, because they are generally too small to support pastoral or arable farming, and involve considerable cost in their upkeep.
10) The further submitters want to be able to downsize their properties to reduce the cost of maintaining them, and because they have no economic use for most of the land.

[redacted]

11) The original and further submissions, if accepted, would greatly increase the number of large residential sections on a persistently under-supplied market, thereby helping minimise the further sub-division of productive farmland.
12) The infrastructure – water and sewerage – to service the proposed large residential blocks already exists on the other side of Lehmans Road, minimising the connection costs.
13) The original and further submitters' proposals are appropriate and necessary to achieve the sustainable growth and development of Rangiora, given that the current supply of 800 vacant lots in Rangiora is expected to last only four years.
14) Both proposals cater to an unmet and strong demand for residential sections in Rangiora big enough for a large house and accompanying garaging, outbuildings and swimming pools close to Rangiora's amenities and within walking or cycling distance of local schools. For these buyers the 4ha lifestyle block is too large and unmanageable to meet their needs.
15) No additional cost will accrue to the council in re-zoning the submitters' and further submitters' land because there is adequate capacity in the public utilities and existing road networks, including planned upgrades.
16) Both proposals support the council's strategic approach to the provision of Rural Residential Land (presently zoned LLRZ in the PWDP) to create new residential areas, with a secondary focus on enabling intensification into Large Residential lots within existing rural fringe areas where there is sufficient community support and servicing available.
17) There is no danger of the submitters' proposals creating reverse sensitivity issues with adjoining land users, and specifically that of the Rangiora Racecourse which is more than 500m away at the nearest point.
18) The proposals are not intended to provide a staged development towards full urban intensification, which is otherwise catered for to the east of Rangiora, but to provide a unique residential environment to the west that can stand alone and contribute to the urban fabric of Rangiora.
19) The proposals will contribute to a wider range of housing types in Rangiora, and boost competition in the Rangiora housing and land markets.
20) The area, which is mostly flat, contains no wet-lands or lakes, though the Ashley River lies to the north, and as an inland site appears to face no specific climate change effects or issues.

Allow or disallow the original submission (in full or in part):

We support allowing the original submission to the extent that it does not contradict this further submission.

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

1) The proposed re-zoning will help meet a strong and under-supplied market for small rural holdings (less than 4ha) that seems not to be otherwise catered for in the proposed district plan.
2) The proposed re-zoning would help Rangiora deal with an impending shortage of building sections while making no further demands on the land supply.
3) The proposed re-zoning is in line with the principles driving recent and pending central government legislation.

[redacted]

TRIM: 221118200701 / DDS-14-04

4) The re-zoning will not involve significant council expenditure given that the requisite transport and infrastructure services are already in place, just across the road.
5) The re-zoning will have no significant environmental impact and create no reverse sensitivity issues.

[redacted]

TRIM: 221118200701 / DDS-14-04

Note

A copy of your further submission must be served on the original submitter within 5 working days after it is served on the Waimakariri District Council. Contact details for all submitters can be found on the Waimakariri District Council website, at waimakariri.govt.nz/planning/district-plan.

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

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

Privacy Act 1993

Please note information on this form and the content of your submission will be made publicly available as part of the decision-making process.

This form is in the format required by Form 6 of the Resource Management (Forms, Fees and Procedure) Regulations 2003.

Further submissions close on Monday, 21 November 2022 at 5pm.

Returning this form

You can:

- Email it to: developmentplanning@wmk.govt.nz - Subject line: Further Submission
- Post it to: Waimakariri District Council, Private Bag 1005, Rangiora 7440
- Deliver it to a Council Service Centre in Rangiora, Kaiapoi or Oxford

[redacted]

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

Address for service:
Malcolm Dartnall
4 Montrose Gardens Rangiora 7400
New Zealand
Email: malcolm@survus.co.nz

Attachments
Further submission on 236-SUBMISSION-RICK-ALLAWAY-AND-LIONEL-LARSEN-ASTON-CONSULTANTS.pdf
Further submission on 236-SUBMISSION-RICK-ALLAWAY-AND-LIONEL-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 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 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 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 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 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 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 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 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 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:

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 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 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 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.

Further Submission Point 4.

Reason

See Attachment

I seek that the submission be:
Allowed

Further Submission by Transpower New Zealand Limited

- Proposed Waimakariri District Plan

- Proposed Variation 1: Housing Intensification (Medium Density Residential Standards)

21 November 2022

Keeping the energy flowing

TRANSPOWER

Transpower New Zealand Limited The National Grid

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 ("the Council")

Name of person making further submission: Transpower New Zealand Limited ("Transpower")

This is a further submission in support of, and in opposition to, submissions on:

- **the proposed Waimakariri District Plan ("Proposed District Plan"); and**
- **Variation 1: Housing Intensification (Medium Density Residential Standards) to the Proposed District Plan ("Proposed Variation").**

Transpower has an interest in the Proposed District Plan and Proposed Variation that is greater than the interest the general public has, for reasons including the following:

- Transpower is the owner and operator of the National Grid and the National Grid is enabled, protected and regulated by the National Policy Statement on Electricity Transmission 2008 ("NPSET") and the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 ("NESETA"). The Proposed District Plan must give effect to the NPSET and must not duplicate or conflict with the regulations in the NESETA. Transpower has an interest in ensuring that the Proposed District Plan meets these statutory obligations.
- Transpower has an interest as a landowner and/or occupier in respect of existing and future National Grid infrastructure that is potentially affected (directly or indirectly) by the relevant submissions.
- Transpower made an original submission on matters raised or affected by other submissions.

Transpower's further submissions

- In respect of the Proposed District Plan, Transpower's support of, or opposition to, a particular submission including the reason for Transpower's support or opposition and the relief sought are detailed in the table attached as Appendix A. The general reasons for Transpower's further submission are set out below. These reasons apply to each submission listed in Appendix A and are supplemented by specific reasons and relief in Appendix A.
- In respect of the Proposed Variation, Transpower's support of, or opposition to, a particular submission including the reason for Transpower's support or opposition and the relief sought are detailed in the table attached as Appendix B. The general reasons for Transpower's further submission are set out below. These reasons apply to each submission listed in Appendix B and are supplemented by specific reasons and relief in Appendix B.

General reasons and decisions sought in respect of submissions supported by Transpower

For each of the submissions identified as being supported by Transpower, they are supported to the extent that they:

- give effect to the NPSET;

- give effect to relevant provisions of the Canterbury Regional Policy Statement 2013 (July 2021) ("CRPS");
- are consistent with and/or promote the outcomes sought by the NESETA;
- are the most appropriate means of exercising the Council's functions in respect of section 32 of the RMA;
- enable people and communities to provide for their social, economic and cultural well-being and for their health and safety.

Transpower seeks that the submissions it supports be allowed to the extent that they achieve the matters set out above or such further alternate relief or amendments as may be necessary to achieve those matters.

General reasons and decisions sought in respect of submissions opposed by Transpower

For each of the submissions identified as being opposed by Transpower, they are opposed to the extent that they failed to achieve the matters set out above.

Transpower seeks that the submissions it opposes be disallowed to the extent that they fail to achieve the matters set out above or such further alternative relief or amendments as may be necessary to achieve those matters.

Transpower wishes to be heard in support of its further submissions.

Due to the specific interests of Transpower, and particularly the national significance of the National Grid, Transpower will not consider presenting a joint case.

Environmental Regulatory Team Leader, Transpower
Signature of person authorised to sign
on behalf of Transpower New Zealand Limited

Date: **21 November 2022**

Electronic address for service: **environment.policy@transpower.co.nz**
Telephone: **+64 3 590 7126**
Postal address: **PO Box 1021 Wellington 6140**
Contact person: **Trudi Burney**

Appendix A – Transpower New Zealand Limited: Further Submission on Submissions Made on the Proposed Waimakariri District Plan

The following table sets out the decisions sought by Transpower in respect of submissions made on the Proposed District Plan, including the reasons for Transpower's support or opposition in respect of the original submission. The Proposed District Plan text is shown without underlining; the relief sought in primary submission is shown as black underlined and ~~strikethrough~~; and the further amendments sought by Transpower are shown in red double underlined and ~~double strikethrough~~.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
Fulton Hogan Limited (Submission reference 41)				
41.7	Definitions Definition of 'Indigenous Vegetation' Amend the definition of 'indigenous vegetation clearance' as follows: *"means the felling, ~~clearing~~ removal~~,~~ or damage ~~or disturbance~~ of indigenous vegetation by activities including cutting, mob stocking, crushing, cultivation, irrigation, earthworks, chemical application, artificial drainage, stop banking~~,~~ or burning~~, or any other activity in or directly adjacent to an area of indigenous vegetation that destroys or directly results in extensive failure of an area of indigenous vegetation~~."*	Support	Transpower supports the relief sought on the basis that the revised definition provides greater clarity through the deletion of 'clearance' and 'disturbance' from the definition.	**Allow** the submission.
Chorus New Zealand Limited ("Chorus"), Spark New Zealand Trading Limited ("Spark") and Vodafone New Zealand Limited ("Vodafone") (Submission reference 62)				
62.36 and 62.62 to 62.75	EI - Pungao me te hanganga hapori - Energy and infrastructure Matters of Discretion EI-MD3 Amend EI-R2, EI-R4, EI-R7, EI-R8, EI-R9, EI-R11, EI-R12, EI-R13, EI-R14, EI-R15, EI-R16, EI-R17, EI-R36, EI-R40 by including EI-MD3 as a matter of discretion where permitted activity standards are not met.	Support	Transpower agrees with the submission and considers that operational considerations should similarly be a matter of discretion when for electricity transmission infrastructure and the matter of discretion should be applied to all rules that relate to electricity infrastructure in the same manner.	**Allow** the submission by including EI-MD3 to all relevant rules that relate to electricity transmission infrastructure.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
62.46	ECO - Punaha hauropi me te rerenga rauropi taketake - Ecosystems and indigenous biodiversity Matters of Discretion ECO-MD1 Amend ECO-MD1 by adding a further clause: *"...* *x. In respect of infrastructure, the extent to which the proposed infrastructure has a functional need or operational need for its location, and whether alternative locations or layout/methodology would be suitable."*	Support	Transpower agrees with the submission and considers that the functional need and operational need of infrastructure is a relevant consideration in respect of indigenous vegetation clearance.	**Allow** the submission.
Kyleston Farms Ltd (Submission reference 70)				
70.1	LLRZ - Large Lot Residential Zone Rezone 90 Dixons Road, Loburn as Large Lot Residential Zone.	Neutral	Transpower does not support or oppose the relief sought, however, it is noted that the subject land is traversed by the National Grid and the submission has not considered the implications of this. Transpower is concerned that rezoning land in the vicinity of the National Grid for residential land uses may give rise to a misleading expectation in respect of the ability to develop the site given District Plan rules and other regulations, including the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP34:2001) and the Public Works Act. Transpower seeks that any decision to rezone the site to a provide for residential uses be made in a manner that: - is cognisant of the provisions in the proposed District Plan that enable and protect the National Grid (as amended by Transpower's submission); - gives effect to Policies 10 and 11 of the NPSET; - gives effect to Policy 16.3.4 of the CRPS by "*avoiding subdivision, use and development including urban or semi urban development patterns, which would otherwise limit the ability of the electricity transmission network to be*	If the submission is allowed, ensure that the site can be subdivided and developed in a manner that complies with the relevant rules and therefore avoids sensitive activities in the National Grid Yard and does not compromise the National Grid.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
			operated, maintained, upgraded and developed"; and therefore - achieves the purpose of the RMA.	
Alan and Margaret Fraser (Submission reference 123), Alison and Peter Batchelor (Submission reference 135), Anton and Deana Musson (Submission reference 137), Ron and Tracey Taylor (Submission reference 138), Leanne and Paul Strathern (Submission reference 139), Dianne and Geoff Grundy (Submission reference 140), Graeme and Lynne Wellington (Submission reference 141)				
123.1, 135.1, 137.1, 138.1, 139.1, 140.1, 141.1	Planning Maps Rezone 21 Fawcetts Road (Lot 2 DP 75032), 49 Fawcetts Road (Lot 1 DP 75032), 63 Fawcetts Road (Lot 1 DP 29067), 65 Fawcetts Road (Lot 2 DP 29067), 75 Fawcetts Road (Lot 3 DP 29067), 87 Fawcetts Road (Lot 4 DP 29067), 9 Boundary Road (Lot 5 DP 29067), 17 Boundary Road (Lot 6 DP 29067), 25 Boundary Road (Lot 10 DP 29067) from Rural Lifestyle Zone to Large Lot Residential Zone.	Neutral	Transpower does not support or oppose the relief sought, and acknowledges that the submission addresses the potential impact of the rezoning sought on the National Grid. Transpower seeks that any decision to rezone the site to provide for residential uses be made in a manner that: - is cognisant of the provisions in the proposed District Plan that enable and protect the National Grid (as amended by Transpower's sub mission); - gives effect to Policies 10 and 11 of the NPSET; - gives effect to Policy 16.3.4 of the CRPS by "*avoiding subdivision, use and development including urban or semi urban development patterns, which would otherwise limit the ability of the electricity transmission network to be operated, maintained, upgraded and developed*"; - is consistent with Proposed District Plan provisions, including Objective SD-O3; and therefore - achieves the purpose of the RMA. Transpower considers that, given the transmission lines traverse the corner of the site subject to the submission, one option to achieve this would be to retain the Rural Lifestyle Zone over the area that is subject to the National Grid Yard.	If the submission is allowed, ensure that the site can be subdivided and developed in a manner that complies with the relevant rules and therefore avoids sensitive activities in the National Grid Yard and does not compromise the National Grid.
Rolleston Industrial Developments Limited (Submission reference 160)				

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
160.1	General Rezone Ohoka properties legally described as Lot 2 & 3 DP 318615, Lot 2 & Part Lot 1 DP 8301, Lot 2 DP 61732, Lot 1 DP 55849, Lot 2 DP55404, Part RS 2220, Lot 1 DP 318615 and Part Lot 1 DP 2267 General Residential Zone with a portion subject to an Education/Retirement Village Overlay, Large Lot Residential Zone, Local Centre Zone, and Open Space Zone (as indicated in map in Annexure B of submission) as per the pending private plan change request for this land.	Neutral	Transpower is a submitter on Proposed Private Plan Change 31. Transpower's submission seeks a range of relief in order to: - establish a clear and appropriate expectation of future land use in the vicinity of the National Grid; - provide greater clarity for plan users; - give effect to Policies 1, 2, 10 and 11 of the NPSET; - give effect to the Policy 4 of the NPSUD; - give effect to Policy 16.3.4(2) of the CRPS; - retain the existing considerations and obligations in the NESETA Regulations; - meet the requirements of section 32 and 75 of the RMA; and therefore - achieve the purpose of the RMA. For these reasons, Transpower seeks the same relief in respect of the Proposed District Plan.	If the submission is allowed: - retain the Rural Zone over the area of land that is traversed by the National Grid, including an appropriate buffer; - require Transpower to be consulted as part of any application for subdivision consent for the site; - include explicit direction landscape treatments in the vicinity of the National Grid must be designed and implemented to achieve compliance with NZECP 34:2001 and the Electricity (Hazards from Trees) Regulations 2003 (including when planting reaches maturity).
New Zealand Pork Industry Board ("NZ Pork") (Submission reference 169)				
169.9	Definitions Definition of 'sensitive activity' Opposes the definition of 'sensitive activity' because it does not cover other activities that are sensitive to the effects of primary production, and are permitted in rural zones. Seeks that the definition be amended to cover other activities such as conservation activities, recreation activities, rural tourism, equestrian and ancillary activities and facilities, and farmers market.	Oppose	While Transpower acknowledges that the term 'sensitive activity' is used across a range of provisions in the Proposed District Plan, Transpower is concerned that the amendments proposed in the submission would have consequences for the National Grid, and particularly the way in which Policy 11 of the NPSET is given effect to. That is, the suggested amendments are inappropriately broad and inconsistent with the definition in the NPSET.	**Disallow** the submission.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (Submission reference 192)				
192.28	SD - Rautaki ahunga - Strategic directions Introduction Seeks minor amendments to improve consistency between the Strategic Directions and Urban Form and	Support in part	Subject to Transpower's primary submission, Transpower supports the proposed amendment to reference Parts 2 and 3 of the Proposed District Plan. Transpower does not consider that the amendment to reference resource	**Allow** the submission in part, but amending the relief sought as follows:

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	Development Chapters, and clarify that there are more detailed provisions in other Part 2 and Part 3 chapters as follows: *"For the purpose of District Plan development, including plan changes and resource consents, the strategic objectives in this chapter provide direction for the more detailed provisions contained in other Part 2 and Part 3 chapters of the District Plan. …"*		consents is necessary because the direction in respect of resource consents is given in the subsequent sentence of the introductory text.	*"For the purpose of District Plan development, including plan changes ~~and resource consents~~, the strategic objectives in this chapter provide direction for the more detailed provisions contained in other Part 2 and Part 3 chapters of the District Plan. …"*
192.31	SD - Rautaki ahunga - Strategic directions Objectives SD-O3 Amend SD-O3 as follows: *"...* *2. infrastructure, including strategic infrastructure, critical infrastructure and regionally significant infrastructure:* *a. is able to operate efficiently and effectively; while* *ii. managing the adverse effects of other activities on infrastructure, including managing reverse sensitivity; and* *b. ~~is enabled, while~~ the benefits of new infrastructure development are recognised:* *i. ~~managing adverse effects on the surrounding environment,~~ having regard to the social, cultural and economic benefit, functional need and operational need of the infrastructure; ~~and ii. managing the adverse effects of other activities on infrastructure, including managing reverse sensitivity~~; …"*	Oppose	Transpower does not support the amendment sought to Objective SD-O3 on the basis that the amendment deletes reference to infrastructure being 'enabled' in a manner that is inconsistent with, and does not give effect to the Objective of the NPSET and Policy 16.3.4 of the CRPS (insofar as SD-03 relates to the National Grid).	**Disallow** the submission.
192.33	UFD - Ahuatanga auaha a taone - Urban form and development Amend Urban Form and Development introductory text as follows: *"For the purpose of District Plan development, including plan changes and resource consents, the*	Support	Transpower generally supports the amendments proposed in the submission to the extent that the amendments provide clarity and better set out how the various provisions in the Proposed District Plan work together.	**Allow** the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	strategic direction UDF objectives and policies in this chapter ~~must be given effect to through~~ provide direction for the more detailed provisions contained in other Part 2 and Part 3 chapters of the District Plan. For the purpose of District Plan implementation, including the determination of resource consent applications: *1. the strategic UFD objectives and policies may provide guidance for related objectives and policies in other chapters; and* *2. the relevant objectives and policies of the District Plan, including strategic objectives in this chapter, are to be considered together and no hierarchy exists between them."*			
192.41	ECO - Punaha hauropi me te rerenga rauropi taketake - Ecosystems and indigenous biodiversity Amend ECO-O1 as follows: "Overall, there is an increase in the quality and extent of indigenous biodiversity throughout the District, comprising: 1. protected and restored SNAs; and 2. other areas of indigenous vegetation and habitat of indigenous fauna that are maintained or and where practicable enhanced."	Support	Transpower generally supports the amendments proposed to Objective ECO-O1 to the extent that the amendments better reflect the high order direction given in the CRPS and the RMA.	**Allow** the submission to the extent that it is consistent with high order provisions and the RMA.
192.56	ECO - Punaha hauropi me te rerenga rauropi taketake - Ecosystems and indigenous biodiversity Matters of Discretion ECO-MD1 Amongst other matters, amendment ECO-MD1 to include the following: *"12. the purpose for clearance and the effects of use for that purpose on remaining and adjacent indigenous biodiversity.*	Support in part	Transpower supports the addition of further clauses in ECO-MD1 and particularly notes that having the ability to consider the purpose of clearance allows the benefits of the activity that gives rise to the clearance to be considered.	**Allow** the submission to the extent that the two new clauses are included in ECO-MD1.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	13. the extent to which clearance maintains indigenous biodiversity."			
192.69	NATC - Ahuatanga o te awa - Natural character of freshwater bodies Policies NATC-P4 Amend Policy NATC-P4, clause (2) because it is not clear what minimising means in this context. The Policy should be consistent with NATC-P5 and NATC-P6 which does not use 'minimise' but uses avoid, remedy or mitigate.	Support	Transpower generally supports the submission on the basis that the use of 'minimise' is unclear and similarly considers that 'avoid, remedy or mitigate' is more appropriate in the context of Policy NATC-P4. Limited amendments are sought to confirm that the Policy is intended to address the effects of vegetation clearance.	**Allow** the submission by amending Policy NATC-P4(2) as follows: *"Avoid ~~minimising~~ remedy or mitigate the effects of ~~in that order~~, indigenous vegetation clearance and medication, including where associated with ground disturbance and the location of structures near wetlands, and lakes and rivers and their margins; …"*
Waimakariri Irrigation Limited ("WIL") (Submission reference 210)				
210.6	NH - Matepa mahorahora - Natural hazards Policies NH-P12 Considers it inappropriate that the policy requires that there are no practical alternatives, particularly in the case of existing below ground infrastructure. It would be inappropriate to have to prove that there are no practical alternatives to upgrades whenever undertaking those works. Seeks that Policy NH-P12(3) is amended to delete the requirement that there be no practical alternatives.	Support	Transpower supports the deletion of reference to 'no practical alternatives' and agrees with the submission that the Policy, as notified, could direct unusual and inefficient outcomes that are nevertheless 'practical alternatives'.	**Allow** the submission and amend Policy NH-P12 as follows: *"3. there is a functional need or operational need for the infrastructure to be located in a high flood hazard or high coastal flood hazard area ~~and there are no practical alternatives~~; and …"*
210.15	SASM - Nga whenua tapu o nga iwi - Sites and areas of significance to Maori Matters of Discretion SASM-MD1 Seeks that SASM-MD1 is amended to replace "suitable" with "practicable".	Support	Transpower supports the amendment proposed on the basis that the language is better understood and therefore, the amendment provides greater clarity to plan users.	**Allow** the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
210.16	SASM - Nga whenua tapu o nga iwi - Sites and areas of significance to Maori Matters of Discretion SASM-MD2 Seeks that SASM-MD2 is amended to replace "suitable" with "practicable".	Support	Transpower supports the amendment proposed on the basis that the language is better understood and therefore, the amendment provides greater clarity to plan users.	**Allow** the submission.
210.17	SASM - Nga whenua tapu o nga iwi - Sites and areas of significance to Maori Matters of Discretion SASM-MD3 Seeks that SASM-MD3 is amended to replace "suitable" with "practicable".	Support	Transpower supports the amendment proposed on the basis that the language is better understood and therefore, the amendment provides greater clarity to plan users.	**Allow** the submission.
210.28	NATC - Ahuatanga o te awa - Natural character of freshwater bodies Policies NATC-P2 Amend Policy NATC-P2 to include the following "*5. the absence of critical or regionally significant infrastructure."*	Support	Transpower supports the relief sought on to the extent that the presence of infrastructure is likely to diminish the natural character values of a water body.	**Allow** the submission.
210.29	NATC - Ahuatanga o te awa - Natural character of freshwater bodies Policies NATC-P3 Amend NATC-P3 as follows: *"Recognise the cultural significance of wetlands, lakes and rivers and their margins, to mana whenua, and manage the effects of land use activities ~~through limiting the size, visual appearance, and location~~, to ensure they do not adversely affect taonga species, mahinga kai or customary harvesting, access, and other cultural values."*	Support	Transpower supports the submission because alternative methods are also relevant, particularly in respect of the National Grid and the direction given by Policy 4 of the NPSET. Further, it is noted that operational requirements may mean that limiting size, appearance and location cannot be achieved.	**Allow** the submission.
CSI Property Limited (Submission reference 212)				
212.1	Planning Maps – General Oppose Rural Lifestyle zoning for 149, 197, 243 and 287 Boys Road, 4,137, 150 and 228 Marsh Road, 2, 10,	Neutral	Transpower does not support or oppose the relief sought, however, it is noted that the subject land is traversed by	If the submission is allowed, ensure that the site can be subdivided and developed in a manner that complies with the

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	24, 28, 32 and 34 Dunlops Road, 17 and 21 Gefkins Road, 109 Camside Road, and part of 65 Northbrook Road. Seek rezoning to General Residential Zone, with some commercial zoning as required to service that area."		the National Grid and the submission has not considered the implications of this. Transpower is concerned that rezoning land in the vicinity of the National Grid for residential land uses may give rise to a misleading expectation in respect of the ability to develop the site given District Plan rules and other regulations, including the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP34:2001) and the Public Works Act. Transpower seeks that any decision to rezone the site to provide for residential uses be made in a manner that: - is cognisant of the provisions in the proposed District Plan that enable and protect the National Grid (as amended by Transpower's submission); - gives effect to Policies 10 and 11 of the NPSET; - gives effect to Policy 16.3.4 of the CRPS by "avoiding subdivision, use and development including urban or semi urban development patterns, which would otherwise limit the ability of the electricity transmission network to be operated, maintained, upgraded and developed", - is consistent with Proposed District Plan provisions, including Objective SD-O3; and therefore - achieves the purpose of the RMA.	relevant rules and therefore avoids sensitive activities in the National Grid Yard and does not compromise the National Grid.
212.3	Planning Maps- General Rezone 301 Bradleys Road and rezone to General Residential Zone and Large Lot Residential Zone, with commercial zoning as required to service that area.	Neutral	Transpower does not support or oppose the relief sought, however, it is noted that the subject land is traversed by the National Grid and the submission has not considered the implications of this. Transpower is concerned that rezoning land in the vicinity of the National Grid for residential land uses may give rise to a misleading expectation in respect of the ability to develop the site given District Plan rules and other regulations, including the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP34:2001) and the Public Works Act.	If the submission is allowed, ensure that the site can be subdivided and developed in a manner that complies with the relevant rules and therefore avoids sensitive activities in the National Grid Yard and does not compromise the National Grid.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
			Transpower seeks that any decision to rezone the site to provide for residential uses be made in a manner that: - is cognisant of the provisions in the proposed District Plan that enable and protect the National Grid (as amended by Transpower's submission); - gives effect to Policies 10 and 11 of the NPSET; - gives effect to Policy 16.3.4 of the CRPS by "avoiding subdivision, use and development including urban or semi urban development patterns, which would otherwise limit the ability of the electricity transmission network to be operated, maintained, upgraded and developed"; - is consistent with Proposed District Plan provisions, including Objective SD-O3; and therefore - achieves the purpose of the RMA.	
Concept Services (Submission reference 230)				
230.7	SUB - Wawahia whenua – Subdivision Policies SUB-P1 The term 'avoid' is restrictive and unnecessary when a proposed subdivision would likely require consultation with Transpower, and a solution could be found where subdivision is appropriate. The term 'avoid' often implies an activity has an activity status of non-complying or prohibited, however SUB-R6 provides for subdivision within the National Grid Yard as restricted discretionary activity. Amending SUB-P1 would make it is more consistent with SUB-R6. Amend SUB-P1(3) as follows: *"~~Avoids~~ Manages subdivision that has the potential to restrict the operation … of the National Grid."*	Oppose	Transpower does not support the relief sought on the basis that the amendments proposed do not give effect to the NPSET and Policy 16.3.4 of the CRPS.	**Disallow** the submission.
Rick Allaway and Lionel Larsen (Submission reference 236)				
236.1	Planning Maps - General	Neutral	Transpower does not support or oppose the relief sought, however, it is noted that the subject land is traversed by	If the submission is allowed, ensure that the site can be

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	Rezone 181, 201, 255, 257, 259, 261, 263, 265, 267, 271, 285, 305, 311, and 315 Lehmans Rd, Fernside from Rural Lifestyle Zone (RLZ) to Large Lot Residential Zone (LLRZ) with net site area density partly 1000m^2 minimum with 1500m^2 minimum average and partly 2500m^2 minimum with 5000m^2 minimum average, along with some higher density residential development. Or amend planning map to enable the submitter's alternative request to rezone the site Low Density Residential Zone; or General Residential Zone (GRZ); or LLRZ (either LLRZ density standards; or net site area density partly 1000m^2 minimum with 1500m^2 minimum average and partly 2500m^2 minimum with 5000m^2 minimum average), Low Density Residential Zone (1000m^2 minimum and 1500m^2 minimum average), or GRZ, along with some higher density residential development.		the National Grid and the submission has not considered the implications of this and instead has suggested that this can be parked for the ODP/subdivision stage. Transpower does not agree and notes that the decisions on the Proposed District Plan must give effect to the NPSET and CRPS. Transpower is concerned that rezoning land in the vicinity of the National Grid for residential land uses may give rise to a misleading expectation in respect of the ability to develop the site given District Plan rules and other regulations, including the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP34:2001) and the Public Works Act. Transpower seeks that any decision to rezone the site to provide for residential uses be made in a manner that: - is cognisant of the provisions in the proposed District Plan that enable and protect the National Grid (as amended by Transpower's submission); - gives effect to Policies 10 and 11 of the NPSET; - gives effect to Policy 16.3.4 of the CRPS by "*avoiding subdivision, use and development including urban or semi urban development patterns, which would otherwise limit the ability of the electricity transmission network to be operated, maintained, upgraded and developed*"; - is consistent with Proposed District Plan provisions, including Objective SD-O3; and therefore - achieves the purpose of the RMA.	subdivided and developed in a manner that complies with the relevant rules and therefore avoids sensitive activities in the National Grid Yard and does not compromise the National Grid (in turn, giving effect to the NPSET and CRPS).
Carter Group Property Limited (Submission reference 237)				
237.1	Planning Maps -General Rezone Lot 2 & 3 DP 318615, Lot 2 & Part Lot 1 DP 8301, Lot 2 DP 61732, Lot 1 DP 55849, Lot 2 DP55404, Part RS 2220, Lot 1 DP 318615 and Part Lot 1 DP 2267 a combination of General Residential Zone (including	Neutral	Transpower is a submitter on Proposed Private Plan Change 31 that seeks a similar outcome for this site. Transpower's submission seeks a range of relief in order to: - establish a clear and appropriate expectation of future land use in the vicinity of the National Grid;	If the submission is allowed: - retain the Rural Zone over the area of land that is traversed by the National Grid, including an appropriate buffer;

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	an overlay providing for Educational facilities and retirement village activities), Large Lot Residential Zone, Local Centre Zone, and Open Space Zone.		- provide greater clarity for plan users; - give effect to Policies 1, 2, 10 and 11 of the NPSET; - give effect to the Policy 4 of the NPSUD; - give effect to Policy 16.3.4(2) of the CRPS; - retain the existing considerations and obligations in the NESETA Regulations; - meet the requirements of section 32 and 75 of the RMA; and therefore - achieve the purpose of the RMA. For these reasons, Transpower seeks the same relief in respect of the Proposed District Plan.	- require Transpower to be consulted as part of any application for subdivision consent for the site; - include explicit direction landscape treatments in the vicinity of the National Grid must be designed and implemented to achieve compliance with NZECP 34:2001 and the Electricity (Hazards from Trees) Regulations 2003 (including when planting reaches maturity).
David Cowley (Submission reference 244)				
244.1	Planning Maps - General Rezone the land outlined in red on Figure 1 which is 405 Bradleys Road, 547 Mill Road, 351 Bradleys Road, and 566 Mill Road (approximately 51ha) and any other neighbouring land as appropriate (including as outlined blue on Figure 1) from Rural Lifestyle Zone to Large Lot Residential Zone (LLRZ), with minimum lot size of 2,500m^2 and average lot size not less than 5000m^2. Alternatively, rezone to LLRZ, with minimum lot size 1000m^2 and average lot size not less than 2000m^2; or a mix of the above zones, as appropriate."	Neutral	Transpower does not support or oppose the relief sought, however, it is noted that the subject land is traversed by the National Grid and the submission has not considered the implications of this. Transpower is concerned that rezoning land in the vicinity of the National Grid for residential land uses may give rise to a misleading expectation in respect of the ability to develop the site given District Plan rules and other regulations, including the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP34:2001) and the Public Works Act. Transpower seeks that any decision to rezone the site to provide for residential uses be made in a manner that: - is cognisant of the provisions in the proposed District Plan that enable and protect the National Grid (as amended by Transpower's submission); - gives effect to Policies 10 and 11 of the NPSET; - gives effect to Policy 16.3.4 of the CRPS by "*avoiding subdivision, use and development including urban or semi urban development patterns, which would otherwise limit*	If the submission is allowed, ensure that the site can be subdivided and developed in a manner that complies with the relevant rules and therefore avoids sensitive activities in the National Grid Yard and does not compromise the National Grid.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
			the ability of the electricity transmission network to be operated, maintained, upgraded and developed"; - is consistent with Proposed District Plan provisions, including Objective SD-O3; and therefore - achieves the purpose of the RMA.	
MainPower New Zealand Limited (Submission reference 249)				
249.98	EI - Pungao me te hanganga hapori Energy and infrastructure Matters of Discretion EI-MD3 Amend EI-MD3 as follows: " … *2. The extent to which placing infrastructure underground is ~~unreasonable~~ possible in terms of technical constraints, additional costs or environmental effects. …"*	Oppose	Transpower does not support the amendment proposed the EI-MD3 on the basis that assessing whether something is "possible" does not allow a judgement to be made about whether the 'possible' solution is an appropriate outcome. Transpower considers that a test of 'reasonableness' better allows the outcomes to be evaluated.	**Disallow** the submission.
249.197	SD - Rautaki ahunga - Strategic directions Introduction Seek changes to clarify the relationship between the Strategic Directions Chapter and other chapters in the Proposed District Plan as follows: "1. *the SD ~~may~~ provides guidance for related objectives and policies in other chapters; and* *2. the relevant objectives and policies of the DP, including SD in this chapter, are to be considered together, with the SD having primacy over other objectives and policies of the District Plan.~~and no hierarchy exists between them~~."*	Oppose	Transpower considers that the proposed amendments to clause (2) could have significant implications to the way in which the policy framework is understood. The submission suggests that the SD Chapter should have primacy, but does not consider whether the provisions have been developed (including through the section 32 of the RMA evaluation) with the hierarchy suggested.	**Disallow** the submission.
Christchurch International Airport Limited (Submission reference 254)				
254.43	SUB - Wawahia whenua – Subdivision Objectives SUB-O1 Amend Objective SUB-O1 as follows:	Support	Transpower supports the relief sought in the submission and considers that, insofar as the relief relates to the National Grid, the amendments proposed give effect to the NPSET and Policy 16.3.4 of the CRPS.	**Allow** the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	"Subdivision design achieves an integrated pattern of land use, development, and urban form that: *...* *3. supports protection of cultural and heritage values, conservation values; ~~and~~* *4. supports community resilience to climate change and risk from natural hazards.; and* *5. does not give rise to adverse effects on strategic infrastructure."*			
Waka Kotahi NZ Transport Agency (Submission reference 275)				
275.42	EW - Ketuketu w henua – Earthworks Matters of Discretion EW-MD1 Amend EW-MD1(12) as follows: *"12. Any effects on the operation, maintenance, upgrade and development of ~~the National Grid~~critical infrastructure;"*	Neutral	Transpower does not support or oppose the relief sought on the basis that the amendment proposed does not alter the 'matter' in respect of the National Grid.	**Allow** the submission.
275.43	EW - Ketuketu whenua – Earthworks Matters of Discretion EW-MD8 Amend EW-MD8 as follows: " *g. any effects on the stability and life-supporting capacity of soil~~.~~ and* *h. any functional needs and operational needs of critical infrastructure."*	Support	Transpower supports the submission on the basis that there are situations where undertaking earthworks in or on an ONL or ONF is necessary in respect of the operational needs or functional needs of critical infrastructure (for instance, to maintain tower foundations or conductor clearances).	**Allow** the submission.
Doncaster Developments Limited (Submission reference 290)				
290.1	Planning Maps - General Rezone 11.6ha at the northern end of Lehmans Road, Rangiora from Large Lot Residential Zone to General Residential Zone.	Neutral	Transpower does not support or oppose the relief sought, however, it is noted that the subject land is traversed by the National Grid. While the submission acknowledges the presence of the transmission lines, Transpower is concerned that rezoning land in the vicinity of the National Grid for residential land	If the submission is allowed, ensure that the site can be subdivided and developed in a manner that complies with the relevant rules and therefore avoids sensitive activities in the

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
			uses may give rise to a misleading expectation in respect of the ability to develop the site given District Plan rules and other regulations In the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP34:2001) and the Public Works Act. Transpower seeks that any decision to rezone the site to provide for residential uses be made in a manner that: - is cognisant of the provisions in the proposed District Plan, including as qualifying matters in the IPI, that enable and protect the National Grid (as amended by Transpower's submissions on the Proposed District Plan and the Proposed Variation); - gives effect to Policies 10 and 11 of the NPSET. Examples of the relevant National Grid provisions; - gives effect to Policy 16.3.4 of the CRPS by "*avoiding subdivision, use and development including urban or semi urban development patterns, which would otherwise limit the ability of the electricity transmission network to be operated, maintained, upgraded and developed*"; - is consistent with Proposed District Plan provisions, including Objective SD-O3; and therefore - achieves the purpose of the RMA.	National Grid Yard and does not compromise the National Grid.
Horticulture New Zealand ("Hort NZ") (Submission reference 295)				
295.77	EI - Pungao me te hanganga hapori - Energy and infrastructure Activity Rules - General (applicable to all energy and infrastructure) EI-R13 Amend EI-R13 as follows: "*Where:* … *3. there are no increased compliance requirements with NZECP34.2001 for landowners*."	Oppose	Transpower does not support the relief sought because it is not clear how the addition of a tower or pole would place any obligation on a landowner in respect of NZECP34:2001. That is, if an infrastructure provider were to add a tower or pole the obligation to comply with NZECP34:2001 is with the infrastructure provider. If the submission is concerned with impacts on the ability to use a property in the future, this is addressed as a compensation and property related matter.	**Disallow** the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
295.78	EI - Pungao me te hanganga hapori - Energy and infrastructure Activity Rules - General (applicable to all energy and infrastructure) EI-R16 Amend EI-R16 by adding the following additional clause: *"7. there are no increased compliance requirements with NZECP34.2001 for landowners."*	Oppose	Transpower does not support the relief sought because it is not clear how an increase in voltage would place any obligation on a landowner in respect of NZECP34:2001. That is, if an infrastructure provider were to increase voltage of a line, the obligation to comply with NZECP34:2001 is with the infrastructure provider. If the submission is concerned with impacts on the ability to use a property in the future, this is addressed as a compensation and property related matter.	**Disallow** the submission.
295.82	EI - Pungao me te hanganga hapori - Energy and infrastructure Matters of Discretion EI-MD6 Amend EI-MD6(2) as follows: "*2. Extent of compliance with the NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances. Including increased compliance requirements for landowners and occupiers."*	Oppose	Transpower does not support the relief sought because it is not clear how any activity would place any obligation on a landowner in respect of NZECP34:2001.	**Disallow** the submission.
295.83	EI - Pungao me te hanganga hapori - Energy and infrastructure Matters of Discretion EI-MD14 Amend EI-MD14 as follows: *"The extent of compliance, including increased compliance requirements for landowners and occupiers, with the relevant standard(s), and the extent of any effects of non-compliance with the relevant standard(s) including cumulative effects."*	Oppose	Transpower does not support the relief sought because it is not clear how any activity would place any obligation on a landowner in respect of NZECP34:2001.	**Disallow** the submission.
Malcolm Taylor (Submission reference 296)				
296.1	Planning Maps – General Rezone the site at 1136-1160 Tram Road, 121-143 Wards Road and 490-494 No 10 Road from Rural Lifestyle Zone to Large Lot Residential Zone, to allow for allotment sizes in line with zoning of	Neutral	Transpower does not support or oppose the relief sought, however, it is noted that the subject land is traversed by the National Grid. Transpower is concerned that rezoning land in the vicinity of the National Grid for residential land uses may give rise to a misleading expectation in respect of the ability to	If the submission is allowed, ensure that the site can be subdivided and developed in a manner that complies with the relevant rules and therefore avoids sensitive activities in the

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	adjoining areas to the south and east around Mandeville.		develop the site given District Plan rules and other regulations in the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP34:2001) and the Public Works Act. Transpower seeks that any decision to rezone the site to provide for residential uses be made in a manner that: - is cognisant of the provisions in the proposed District Plan, including as qualifying matters in the IPI, that enable and protect the National Grid (as amended by Transpower's submissions on the Proposed District Plan and the Proposed Variation); - gives effect to Policies 10 and 11 of the NPSET. Examples of the relevant National Grid provisions; - gives effect to Policy 16.3.4 of the CRPS by "*avoiding subdivision, use and development including urban or semi urban development patterns, which would otherwise limit the ability of the electricity transmission network to be operated, maintained, upgraded and developed*"; - is consistent with Proposed District Plan provisions, including Objective SD-O3; and therefore - achieves the purpose of the RMA.	National Grid Yard and does not compromise the National Grid.
Kāinga Ora – Homes and Communities ("Kāinga Ora") (Submission reference 325)				
325.1	SD - Rautaki ahunga - Strategic directions Introduction Seek changes to clarify the relationship between the Strategic Directions Chapter and other chapters in the Proposed District Plan as follows: "1. *the SD ~~may~~ provides guidance for related objectives and policies in other chapters; and* *2. the relevant objectives and policies of the DP, including SD in this chapter, are to be considered together, with the SD having primacy over other*	Oppose	Transpower considers that the proposed amendments to clause (2) could have significant implications to the way in which the policy framework is understood. The submission suggests that the SD Chapter should have primacy, but does not consider whether the provisions have been developed (including through the section 32 of the RMA evaluation) with the hierarchy suggested.	**Disallow** the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	objectives and policies of the District Plan.~~and no hierarchy exists between them~~."			
325.154	SUB - Wawahia whenua – Subdivision Policies SUB-P1 "Amend SUB-P1(3) as follows: *"Enable subdivision that:* ... *3. manage ~~avoids~~ subdivision that restricts or compromises the operation, maintenance, upgrading and development of the National Grid;"*	Oppose	Transpower does not support the replacement of "avoids" with "manages" in SUB-P1(3) because the amendment proposed does not give effect to the strong direction in the NPSET and Policy 16.3.4 with the later referring to "***avoiding*** *subdivision, use and development including urban or semi urban development patterns, which would otherwise limit the ability of the electricity transmission network to be operated, maintained, upgraded and developed*" [emphasis added].	**Disallow** the submission
325.188	SUB - Wawahia whenua – Subdivision Matters of Control and Discretion SUB-MCD11 Amend SUB-MCD11 to only give effect to the provisions set out in the National Policy Statement on Electricity Transmission.	Oppose	Transpower does not support the relief sought on the basis that the submission does not explain how the amendments proposed confine SUB-MCD11 to matters relevant to the NPSET. Further, the submission does not consider the relevance of the CRPS (and Policy 16.3.4).	**Disallow** the submission
Lachlan James and Gloria Grace MacKintosh (Submission reference 380)				
380.1	Planning Maps General Seek Large Lot Residential Zone Overlay to apply to 194 Cones Road, Ashley.	Neutral	Transpower does not support or oppose the relief sought, however, it is noted that the subject land is traversed by the National Grid. Transpower is concerned that rezoning land in the vicinity of the National Grid for residential land uses may give rise to a misleading expectation in respect of the ability to develop the site given District Plan rules and other regulations In the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP34:2001) and the Public Works Act. Transpower seeks that any decision to rezone the site to provide for residential uses be made in a manner that: - is cognisant of the provisions in the proposed District Plan, including as qualifying matters in the IPI, that enable and protect the National Grid (as amended by	If the submission is allowed, ensure that the site can be subdivided and developed in a manner that complies with the relevant rules and therefore avoids sensitive activities in the National Grid Yard and does not compromise the National Grid.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
			Transpower's submissions on the Proposed District Plan and the Proposed Variation); - gives effect to Policies 10 and 11 of the NPSET. Examples of the relevant National Grid provisions; - gives effect to Policy 16.3.4 of the CRPS by "*avoiding subdivision, use and development including urban or semi urban development patterns, which would otherwise limit the ability of the electricity transmission network to be operated, maintained, upgraded and developed*"; - is consistent with Proposed District Plan provisions, including Objective SD-O3; and therefore - achieves the purpose of the RMA.	
Federated Farmers of New Zealand Inc. (Submission reference 414)				
414.9	Definitions Definition of National Grid Yard Amend the definition of 'National Grid Yard' to be consistent with NZECP34 Code of Practice for Electrical Safe Distances, particularly Section 2.4.1 around support structures. This definition and the yard widths are not consistent and unnecessarily onerous compared to the Code. Note that farmers will be overwhelmingly affected by regulation that exceeds the Code.	Oppose	Transpower opposes the relief sought. The purpose of the National Grid Yard is to give effect to the NPSET, as opposed to implementing NZECP34:2001. The National Grid Yard is measured from the centre line of a transmission line and the foundation of structures and is based on the position of conductors in everyday wind conditions. The identification of such a 'buffer' is a requirement of Policy 11 of the NPSET and is identified as a 'method' in respect of Policy 16.3.4 of the CRPS. Further, it is not clear how farmers will be affected, given that the extent of regulation is less than is currently included in the Operative District Plan. As a final matter, it is noted that the definition of 'National Grid Yard' is part of Transpower's nationally consistent approach to giving effect to the NPSET. In other jurisdictions the submitter has not opposed this approach. Transpower considers it would be useful to understand how Waimakariri District is distinguished from other (and neighbouring) jurisdictions.	**Disallow** the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
414.58 to 414.66	UFD - Ahuatanga auaha a taone - Urban form and development Amend Policies UFD-P1 to UFD-P10 by inserting the following additional clause 3: *"3. Avoid where practicable any development on LUC 1-3 soils."*	Oppose	Transpower considers that the avoidance of any development on highly productive land goes beyond the direction given in the National Policy Statement for Highly Productive Land 2022. Transpower also notes that development on highly productive land does not always result in the loss of the ability to use that land for production. For these reasons, Transpower does not support the inclusion of an additional clause in the UFD Policies.	**Disallow** the submission.
414.68	EI - Pungao me te hanganga hapori - Energy and infrastructure Objectives EI-O3 Amend Objective EI-O3 as follows: *"Effects of other activities and development on energy and infrastructure:* *The safe, efficient and effective operation, maintenance, repair, ~~renewal, upgrading and development~~ of energy and infrastructure is not inappropriately constrained or compromised by activities and development, ~~including by reverse sensitivity effects~~."*	Oppose	Transpower does not support the relief sought because, insofar as the Policy relates to the National Grid: - referring to the development and upgrading of the National Grid is consistent with the NPSET and Policy 16.3.4 of the CRPS; and - it is unclear how the Policy would compromise the Public Works Act processes.	**Disallow** the submission.
414.71	EI - Pungao me te hanganga hapori - Energy and infrastructure Policies EI-P6 Oppose as EI-P6 introduce additional stringency without justification where it goes beyond the constraints on surrounding land use in electricity transmission corridors provided in the NPSET. EI-P6 also introduces a term 'intensive farming activities' which is not defined in the plan. The requirement of the NPSET is only for activities to be reasonably managed to avoid reverse sensitivity effects on the electricity transmission network. The remaining policies cover the ground well, and the rules give	Oppose	Subject to the relief sought in Transpower's primary submission, Transpower opposes the relief sought and notes that the NPSET manages direct effects on the National Grid (particularly through Policy 10), as well as directing the regulation of sensitive activities in the vicinity of the National Grid.	**Disallow** the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	effect to the NZ Electrical Code of Practice and are anticipated by the NPS-ET. EI-P5 manages the adverse effects of energy and infrastructure, and additional effects requiring management are beyond adverse effects has not been explained.			
414.73	EI - Pungao me te hanganga hapori - Energy and infrastructure Activity Rules - General (applicable to all energy and infrastructure) Rule EI-R12 Additions to poles or towers are often for an increase in line capacity or voltage which results in an increase in the corridor width adjacent to the line (under the NZECP34:2001). Whilst the width is limited in this instance to twice the width of the cross-arm (and no increase in height), there is no limitation on the number of times that this upgrade can occur thus, a stealth increase in corridor width could gradually occur without any landholder permission. Amend EI-R12 by limiting it to one event only as follows: "*This rule can only be used once per pole on any given transmission line. Further upgrades require consent*."	Oppose	Transpower does not support the relief sought on the basis that the submission does not identify an adverse effect on the environment that is managed by the proposed clause. Where any electricity line is upgraded, the obligation is on the line owner/operator to maintain compliance with NZECP34. If the submission is concerned with impacts on the ability to use a property in the future, this is addressed as a compensation and property related matter.	**Disallow** the submission.
414.74	EI - Pungao me te hanganga hapori - Energy and infrastructure Activity Rules - General (applicable to all energy and infrastructure) EI-R13 Additions to poles or towers are often for an increase in line capacity or voltage which results in an increase in the corridor width adjacent to the line (under the NZECP34:2001). Whilst the width is limited in this instance to twice the width of the cross-arm (and no increase in height), there is no limitation on the number of times that this upgrade can occur thus, a stealth increase in corridor width could gradually	Oppose	Transpower does not support the relief sought on the basis that the submission does not identify an adverse effect on the environment that is managed by the proposed clause. Where any electricity line is upgraded, the obligation is on the line owner/operator to maintain compliance with NZECP34. If the submission is concerned with impacts on the ability to use a property in the future, this is addressed as a compensation and property related matter.	**Disallow** the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	occur without any landholder permission. Amend EI-R13 by limiting it to one event only as follows: "*This rule can only be used once per pole on any given transmission line. Further upgrades require consent*."			
414.75	EI - Pungao me te hanganga hapori - Energy and infrastructure Activity Rules - General (applicable to all energy and infrastructure) EI-R16 Oppose EI-R16 as this permitted activity rule allows for a doubling of the number of lines, and other substantial upgrades without landholder consultation. The plan fails to anticipate the effects that this will have on the transmission corridor. This is an ever increasing envelope, unsuited to a permitted activity rule which requires clearly defined effects. There is no limitation on the number of times that a line upgrade can be carried out. Amend EI-R16 by deleting the permitted activity rule, and replacing with a restricted discretionary rule.	Oppose	Transpower does not support the relief sought because: - the submission does not describe the adverse effect on the environment that may be caused by the permitted activity; - the relief would not give effect to the NPSET (including Policy 2 and Policy 5); - the relief would be inconsistent with approaches to upgrading the National Grid in neighbouring jurisdictions; - a blanket resource consent requirement is significantly more stringent than the NESETA; - the proposed relief is not the most efficient or effective way to achieve the Objectives and purpose of the RMA.	**Disallow** the submission.
414.76, 414.77 and 414.90	EI - Pungao me te hanganga hapori - Energy and infrastructure Activity Rules - Electricity transmission and electricity distribution Rule EI-R24 and EI-R25 and Matter of Discretion EI-MD14 There is no requirement for landholder consultation, even when a consent is triggered.	Oppose	Transpower does not support the inclusion of provisions that direct consultation with land owners. The provisions that relate to notification best address this in the context of the RMA. Further, in the context of the National Grid, the way in which Transpower interacts with landowners is directed by the Electricity Act in the first instance.	**Disallow** the submission.
414.80 and 414.81	EI - Pungao me te hanganga hapori - Energy and infrastructure Activity Rules - Managing effects of activities and development on the National Grid Rule EI-R51 Rules for National Grid must be consistent with NZECP34 and the National Policy Statement for Electricity Transmission, and not undermine	Oppose	Transpower opposes the relief sought and comments as follows: - the submission fails to identify how the Rule is inconsistent with the NPSET; - easements are property related matters and cannot be regulated though a District Plan policy in retrospect;	**Disallow** the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	landowners' rights awarded by their legal easement agreements and other legislation. The National Grid corridor is located over private land, mostly farms. Transpower should have easement agreements for all their assets to have a direct relationship with the landowner and rights and obligation protected. Furthermore, Transpower already have protection via the Code of Practice for Electrical Safety Distances, and a NPS, which creates a distinctly uneven advantage over landowners.		- the NPSET and CRPS must be given effect to in the District Plan; - NZECP34:2001 is a regulation that relates to safe approach distances only and therefore does not address all potential effects of, and on, the National Grid; - the relief sought is inconsistent with Transpower's nationally consistent approach to giving effect to the NPSET (including in neighbouring jurisdictions) – giving rise to cross boundary issues; and - Transpower considers it would be useful to understand how Waimakariri District is distinguished from other (and neighbouring) jurisdictions, given the submitters position in these jurisdictions.	
414.88	EI - Pungao me te hanganga hapori - Energy and infrastructure Matters of Discretion Matter of Discretion EI-MD12 Amend EI-MD12 as follows: "*1. The extent of any impacts on the operation, maintenance, ~~upgrading and development~~ of the National Grid.* *2. The risk to the structural integrity of any affected National Grid support structure(s).* *~~3. The extent of any impact on the ability of the National Grid owner (Transpower NZ Ltd) to access the National Grid~~.* *4. The risk of electrical hazards affecting public or individual safety, and the risk of property damage."*	Oppose	Transpower does not support the relief sought because: - referring to the development and upgrading of the National Grid is consistent with the NPSET and Policy 16.3.4 of the CRPS; and - achieving access to the National Grid in the context of District Plan provisions is necessary to give effect to Policies 2, 5 and 10 of the NPSET.	**Disallow** the submission.
Director-General of Conservation Tumuaki Ahurei (Submission reference 419)				
419.32	SD - Rautaki ahunga - Strategic directions Objectives SD-O3 Amend Objective SD-O3 as follows: *"a. is able to operate efficiently and effectively; and*	Oppose	Transpower does not support the inclusion of reference to avoiding the loss of extent of natural inland wetlands and the loss of river extent because the proposed amendment fails to include the exception for specified infrastructure	**Disallow** the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	b. is enabled, while: *i. managing adverse effects on the surrounding environment <u>including avoiding the loss of extent of natural inland wetlands and the loss of river extent and values; and</u>* *<u>ii. having regard to the social, cultural and economic benefit, functional need and operational need of the infrastructure; and</u>* *<u>iii. managing the adverse effects of other activities on infrastructure, including managing reverse sensitivity;</u>"*		included in the National Policy Statement on Freshwater 2020.	
419.109	NATC - Ahuatanga o te awa - Natural character of freshwater bodies Policies NATC-P6 Amend Policy NATC-P6 as follows: *"New and existing structures within and over freshwater bodies* *<u>The loss of the extent of natural inland wetlands an the loss of river extent and values is avoided, when providing</u> for new structures, and upgrades to existing structures, on the surface of freshwater where: ..."*	Oppose	Transpower does not support the inclusion of reference to avoiding the loss of extent of natural inland wetlands and the loss of river extent because the proposed amendment fails to include the exception for specified infrastructure included in the National Policy Statement on Freshwater 2020.	**Disallow** the submission.

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Form 6

Waka Kotahi NZ Transport Agency further submission on notified proposal for the Proposed Waimakariri District Plan under Clause 8 of Schedule 1 of the Resource Management Act 1991

21st November 2022

Development Planning Unit
Waimakariri District Council
Private Bag 1005
Rangiora 7440

Via email: developmentplanning@wmk.govt.nz

This is a further submission on a change proposed to the following plan:

Proposed Waimakariri District Plan including Variation 1: Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021.

The Waka Kotahi further submission is:

1. Waka Kotahi NZ Transport Agency (Waka Kotahi) is a Crown entity that takes an integrated approach to transport planning, investment and delivery. The statutory objectives of Waka Kotahi are to undertake its functions in a way that contributes to an effective, efficient and safe land transport system in the public interest. Our vision is for a sustainable, multi-modal land transport system where public transport, active or shared modes are the first choice for most daily transport needs.

2. Waka Kotahi has a mandate under the Land Transport Management Act 2003 (LTMA), the Government Roading Powers Act 1989 (GRPA), and the Government Policy Statement on Land Transport 2021/22-2030/31 (GPS) to carry out its functions in a way that delivers on the transport outcomes set by the government.

3. In the 2021-2024 National Land Transport Programme, Waka Kotahi has allocated significant investment in the Canterbury Region (including Waimakariri District) to the improvement, operation and maintenance of the state highway network, including public transport investment, walking and cycling and transport planning. In addition, Waka Kotahi is a co-funder of the local roading network. Waka Kotahi is therefore a significant investor in the infrastructure required to achieve the land use change and growth anticipated in the Proposed Waimakariri District Plan and through Variation 1: Housing Intensification.

4. Overall, Waka Kotahi has an interest in the Proposed Waimakariri District Plan and Variation 1: Housing Intensification as a result of its role as a:

    - Transport investor – to maximise effective, efficient and strategic returns for New Zealand;

    - Planner of land transport networks – to ensure the integration of infrastructure and land use so as to support liveable communities and the development of an effective and resilient land transport network for customers;

    - Provide for access to and the use of the land transport system – to shape smart, efficient, safe and responsible transport choices; and

    - Manager of the state highway network – to deliver efficient, safe and responsible highway solutions for customers.

5. For these reasons it is considered that Waka Kotahi has an interest which is greater than the general public.

6. Further points are summarised in Tables 1 and 2, which form the bulk of our submission.

7. Waka Kotahi could not gain an advantage in trade competition through this submission.

We seek the following decision from the local authority:

Amend the provisions of the Proposed Waimakariri District Plan as detailed in Tables 1 and 2 (attached) including such further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this further submission.

Waka Kotahi would like to be heard in support of its submission. If others make a similar submission, Waka Kotahi will consider presenting a joint case with them at a hearing.

Signature of person authorised to sign on behalf of Submitter:

Richard Shaw

Team Leader South – Environmental Planning

Waka Kotahi NZ Transport Agency

richard.shaw@nzta.govt.nz

Table 1: Decisions Sought on the Proposed Waimakariri District Plan

Submitter Name/Contact	Submission Number	Chapter/ Provision	Support or oppose	The particular parts of the submission I support or oppose are:	The reasons for my/our support or opposition are:	I seek that the whole or part (describe part) of the submission be allowed or disallowed:
Part 1 – Introduction and general provisions						
Definitions						
Royal Forest and Bird Protection Society of New Zealand Inc.	192.2	Definitions	Support	The relief sought to include a definition of 'biodiversity compensation'	Waka Kotahi supports the inclusion of a definition that defines biodiversity/indigenous vegetation compensation, as this would assist with the interpretation and implementation of ECO-MD1(4). Waka Kotahi has an interest in any new policy direction, that sets out best practice and limits for 'biodiversity compensation', as suggested by the submitter.	Accept part of submission seeking inclusion of definition for biodiversity compensation
Waimakariri District Council	367.32	Definitions	Support	The relief sought to widen the definition of 'active transport' to include low-powered e-bikes and e-scooters	Waka Kotahi supports the widening of the definition of 'active transport' to include low-powered e-bikes and e-scooters, as these may be used in a manner that primarily relies on human power and therefore align with the intent of the notified definition.	Accept the submission
Royal Forest and Bird Protection Society of New Zealand Inc.	192.19	Definitions	Oppose	The relief sought to amend the definition of 'infrastructure' to exclude, or more clearly define the types of infrastructure provided for or excluded from sensitive environments	Waka Kotahi considers that the notified definition of 'infrastructure, which has the same meaning as Section 2 of the RMA, is appropriate. Moreover, should changes to the definition be considered, Waka Kotahi would want to ensure that any change to the notified definition to identify, or exclude, types of infrastructure from sensitive environments, takes into consideration that sometimes infrastructure has an operational need or functional need to be located in a sensitive environment.	Reject the submission

Submitter Name/Contact	Submission Number	Chapter/ Provision	Support or oppose	The particular parts of the submission I support or oppose are:	The reasons for my/our support or opposition are:	I seek that the whole or part (describe part) of the submission be allowed or disallowed:
Royal Forest and Bird Protection Society of New Zealand Inc.	192.23	Definitions	Oppose	The relief sought to delete the definition of 'no net loss'	Waka Kotahi considers it appropriate that the Plan contain a definition of 'no net loss' and notes that the use of this term in the NPS for Freshwater Management (NPS-FM) is particular to rivers and wetlands. The term in the Plan relates to indigenous biodiversity, and is not particular to rivers and wetlands, and as such, we consider it does not need to strictly align with the NPS-FM.	Reject the submission
Royal Forest and Bird Protection Society of New Zealand Inc.	192.25	Definitions	Oppose	The relief sought to delete cycleways and walkways from the definition of 'public amenities'	Waka Kotahi considers that cycleways and walkways would, depending on their formation, comply with the definition of a structure, and as such they may also provide amenity and assist the public, we consider they also comply with the notified definition of a 'public amenity'.	Accept the submission
Federated Farmers of New Zealand Inc	414.21	Definitions	Oppose	The relief sought to delete the definition of 'upgrading'	Waka Kotahi considers it appropriate that the Plan contain a definition of 'upgrading', as it provides clarity to Plan users as to the nature and scale of natural hazard mitigation works that are considered to constitute 'upgrading'.	Reject the submission
Part 2 – District-wide matters						
Strategic directions						
SD – Rautaki ahunga - Strategic directions						
CA and GJ McKeever	111.3	SD-O2	Oppose	Oppose the submission in full	The purpose of the strategic direction is to limit large lot residential development to specific locations within the district. The submitter seeks to provide for large lot development throughout the district provided there are not infrastructure constraints. Waka Kotahi does not support this	Reject the submission

Submitter Name/Contact	Submission Number	Chapter/ Provision	Support or oppose	The particular parts of the submission I support or oppose are:	The reasons for my/our support or opposition are:	I seek that the whole or part (describe part) of the submission be allowed or disallowed:
					principle as this type of development does not reflect the good urban development form that is sought throughout the district and through the NPSUD and Variation 1: Housing Intensification, therefore, it is not considered to be appropriate.	
John Stevenson	162.2	SD-O2	Oppose	Oppose the submission in full	The purpose of the strategic direction is to limit large lot residential development to specific locations within the district. The submitter seeks to provide for large lot development throughout the district provided there are not infrastructure constraints. Waka Kotahi does not support this principle as this type of development does not reflect the good urban development form that is sought throughout the district and through the NPSUD and Variation 1: Housing Intensification, therefore, it is not considered to be appropriate.	Reject the submission
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest and Bird) - Nicky Snoyink	192.31	SD-03	Oppose	Oppose the submission in full	Waka Kotahi supported SD-O3 as notified and seek that the effects of reverse sensitivity are recognised, whereas the submitter seeks to remove reference to reverse sensitivity.	Reject the submission
Resource Management Group Limited - Melanie Foote	249.202	SD-O6	Support	The general intent of the suggested wording is supported	Waka Kotahi generally support the intent of the wording proposed by the submitter, however, suggest that reference to the operational and functional needs of infrastructure could be included	Further consider the wording proposed

Submitter Name/Contact	Submission Number	Chapter/ Provision	Support or oppose	The particular parts of the submission I support or oppose are:	The reasons for my/our support or opposition are:	I seek that the whole or part (describe part) of the submission be allowed or disallowed:
					as opposed to "reasonable alternative" for consistency with the National Planning Standards.	
Christchurch International Airport – Amy Hill	254.18	SD-O2	Support	Waka Kotahi supports the intent of the wording proposed by the submitter which is similar to that proposed by Waka Kotahi in its original submission	Waka Kotahi generally support the additional wording proposed by the submitter which recognises the need to consider the operational needs of infrastructure when providing for urban development.	Accept the submission
Chloe Chai and Mark McKitterick	256.3	SD-O2	Oppose	Oppose the submission in full	The purpose of the strategic direction is to limit large lot residential development to specific locations within the district. The submitter seeks to provide for large lot development throughout the district provided there are not infrastructure constraints. Waka Kotahi does not support this principle as this type of development does not reflect the good urban development form that is sought throughout the district and through the NPSUD and Variation 1: Housing Intensification, therefore, it is not considered to be appropriate.	Reject the submission
Ngai Tahu Property – Tanya Stevens	411.2	SD-O2	Oppose	Oppose the submission in full	The submitter seeks to alter the objective such that the focus for urban development is not solely on existing centres. Waka Kotahi does not support the shift in emphasis as this is likely to result in development that is not well connected by public transport and active transport modes in other locations.	Reject the submission
Keith Goodwin	418.3	SD-O2	Oppose	Oppose the submission in full	The purpose of the strategic direction is to limit large lot residential development to specific locations within the district. The submitter seeks to	Reject the submission

Submitter Name/Contact	Submission Number	Chapter/ Provision	Support or oppose	The particular parts of the submission I support or oppose are:	The reasons for my/our support or opposition are:	I seek that the whole or part (describe part) of the submission be allowed or disallowed:
					provide for large lot development throughout the district provided there are not infrastructure constraints. Waka Kotahi does not support this principle as this type of development does not reflect the good urban development form that is sought throughout the district and through the NPSUD and Variation 1: Housing Intensification, therefore, it is not considered to be appropriate.	
Department of Conservation – Amy Young	419.32	SD-O3	Support	Support proposed clauses ii. and iii.	The submitter seeks to amend the objective to include reference to the benefits and functional needs of infrastructure and the need to manage reverse sensitivity effects on infrastructure. Waka Kotahi support reference to these two needs and suggest that reference to the functional and operational needs of infrastructure could be considered for consistency with the plan and National Planning Standards.	Accept proposed clauses ii. and iii.
UFD – Āhuatanga auaha ā tāone - Urban form and development						
Ara Poutama Aotearoa, the Department of Corrections - Andrea Millar	52.4	UFD-XX	Oppose	Oppose the submission in full	While Waka Kotahi does not oppose the intent of the proposed policy, it is considered that this would be better incorporated into one of the existing policies, and reference to considerations for residential development should be included, for example reverse sensitivity.	Reject the submission
Chapman Tripp - Jo Appleyard / Lucy Forrester - on behalf of Rolleston	160.3	UFD-P3	Oppose	Oppose the submission in full	As per its submission on Proposed Plan Change 31 Waka Kotahi does not support proposed rezoning at this location.	Reject the submission

Submitter Name/Contact	Submission Number	Chapter/ Provision	Support or oppose	The particular parts of the submission I support or oppose are:	The reasons for my/our support or opposition are:	I seek that the whole or part (describe part) of the submission be allowed or disallowed:
Industrial Developments Limited						
Fiona Aston	223.4	UFD-P2	Oppose	Oppose the submission in full	Waka Kotahi does not support the proposed amendment to clause 2 which seeks to remove the 'avoid' clause, thus weakening the requirement for new residential development to occur in a manner that reflects good urban form and makes use of existing and planned transport networks. Waka Kotahi does not support the proposed amendments to clauses 2(c) and 2(g) which seek to provide for some new residential development which may not support a reduction in greenhouse gas emissions and private vehicle use.	Reject the submission
Concept Services – Jane West	230.2	UFD-P2	Oppose	Oppose the submission in full	The intent of the policy is to avoid new residential development that does not meet the listed criteria. Waka Kotahi does not support replacing the word 'avoid' with manage as this opens the policy to further interpretation and room for new residential development that is not well connected to existing urban development or well serviced by public and active transport modes.	Reject the submission
Concept Services – Jane West	230.2	UFD-P10	Oppose	Oppose the submission in full	As per above point.	Reject the submission
Fiona Aston	236.5	UFD-P2	Oppose	Oppose the submission in full	The intent of the policy is to avoid new residential development that does not meet the listed criteria. Waka Kotahi does not support the amendments proposed by the submitter which would change the	Reject the submission

Submitter Name/Contact	Submission Number	Chapter/ Provision	Support or oppose	The particular parts of the submission I support or oppose are:	The reasons for my/our support or opposition are:	I seek that the whole or part (describe part) of the submission be allowed or disallowed:
					wording so that new residential development generally has to meet the listed criteria. The original wording has a stronger requirement to meet the criteria listed, to ensure any new development is well connected and reflects good urban form.	
Resource Management Group Limited - Melanie Foote	249.237	UFD-P2	Support in part	Consider changes in light of the wording proposed by Waka Kotahi	Waka Kotahi generally supports the change proposed by the submitter which better requires infrastructure delivery to be aligned with development, however, as per the original submission made by Waka Kotahi the onus should be on the developer if there is insufficient existing or planned transport infrastructure to provide for new Residential Development Areas.	Consider the changes proposed by the submitter in conjunction with the changes proposed by Waka Kotahi in its original submission
Resource Management Group Limited - Melanie Foote	249.238	UFD-P3	Support in part	Generally support the submission	Waka Kotahi generally supports the change proposed by the submitter which better requires infrastructure delivery to be aligned with development, however, as per the submission point above the onus should be on the developer if there is insufficient existing or planned transport infrastructure to provide for additional development.	Consider the changes proposed by the submitter in conjunction with the changes proposed by Waka Kotahi in its original submission on UFD-P2
Resource Management Group Limited - Melanie Foote	249.239	UFD-P4	Support in part	Generally support the submission	Waka Kotahi generally supports the change proposed by the submitter which better requires infrastructure delivery to be aligned with development, however, as per the submission point above the onus should be on the developer if there is insufficient existing or planned transport	Consider the changes proposed by the submitter in conjunction with the changes proposed by Waka Kotahi in its original submission on UFD-P2

Submitter Name/Contact	Submission Number	Chapter/ Provision	Support or oppose	The particular parts of the submission I support or oppose are:	The reasons for my/our support or opposition are:	I seek that the whole or part (describe part) of the submission be allowed or disallowed:
					infrastructure to provide for additional development.	
Resource Management Group Limited - Melanie Foote	249.240	UFD-P5	Support in part	Generally support the submission	Waka Kotahi generally supports the change proposed by the submitter which better requires infrastructure delivery to be aligned with development, however, as per the submission point above the onus should be on the developer if there is insufficient existing or planned transport infrastructure to provide for additional development within an existing industrial zone.	Consider the changes proposed by the submitter in conjunction with the changes proposed by Waka Kotahi in its original submission on UFD-P2
Resource Management Group Limited - Melanie Foote	249.242	UFD-P7	Support in part	Generally support the submission	Waka Kotahi generally supports the change proposed by the submitter which better requires infrastructure delivery to be aligned with development, however, as per the submission point above the onus should be on the developer if there is insufficient existing or planned transport infrastructure to provide for additional development within a new commercial and mixed-use zone.	Consider the changes proposed by the submitter in conjunction with the changes proposed by Waka Kotahi in its original submission on UFD-P2.
Resource Management Group Limited - Melanie Foote	249.243	UFD-P8	Support in part	Generally support the submission	Waka Kotahi generally supports the change proposed by the submitter which better requires infrastructure delivery to be aligned with development, however, as per the submission point above the onus should be on the developer if there is insufficient existing or planned transport infrastructure to provide for additional development in a new industrial zone.	Consider the changes proposed by the submitter in conjunction with the changes proposed by Waka Kotahi in its original submission on UFD-P2
Beca - Adriene Grafia	278.11	UFD-XX	Oppose	Oppose the submission in full	While Waka Kotahi does not oppose the intent of the proposed policy, it is considered that this would be better incorporated into one of the existing	Reject the submission

Submitter Name/Contact	Submission Number	Chapter/ Provision	Support or oppose	The particular parts of the submission I support or oppose are:	The reasons for my/our support or opposition are:	I seek that the whole or part (describe part) of the submission be allowed or disallowed:
					policies, and reference to considerations for residential development should be included, for example reverse sensitivity.	
Canterbury Regional Council – Jo Mitten, Principal Planner	316.7	UFD-P1	Support	Support the submission in full	The submitter seeks to cross-reference the minimum net densities contained in the Subdivision Chapter. Waka Kotahi supports this for ease of use of the plan.	Accept the submission
Canterbury Regional Council – Jo Mitten, Principal Planner	316.9	UFD-P3	Support	Support the submission in full	Waka Kotahi supports this submission point which seeks to limit new Large Lot Residential Development to areas already identified for development. Large lot development does not support a consolidated urban form, reduction in private vehicle use and associated reduction in greenhouse gas emissions from the transport sector such that Waka Kotahi support limiting new Large Lot Residential development as per this submission point and do not support new large-lot residential development.	Accept the submission
Kainga Ora – Homes and Communities - Brendon Liggett	325.9	UFD-P1	Support in part	Reference to planned public transport	The submitter seeks to include a reference to existing or planned public transport. While Waka Kotahi generally supports this point, it is unclear how close is in time a development and planned public transport provision need to be for this to be a relevant consideration in the assessment of a new residential development.	Consider whether a timeframe on planned public transport is required
Kainga Ora – Homes and	325.17	UFD-P10	Oppose	Oppose the submission in full	Waka Kotahi seek to avoid reverse sensitivity effects from noise on new development and	Reject the submission

Submitter Name/Contact	Submission Number	Chapter/ Provision	Support or oppose	The particular parts of the submission I support or oppose are:	The reasons for my/our support or opposition are:	I seek that the whole or part (describe part) of the submission be allowed or disallowed:
Communities - Brendon Liggett					consider that an avoid policy is most appropriate. The submitter seeks to minimise the location of new development that could adversely affect existing infrastructure. Waka Kotahi are of the opinion that the proposed wording should be retained.	
Christchurch City Council – Team Leader City Planning	360.9	UFD-P2	Support	Support the submission in full	Waka Kotahi supports this submission and agrees that further consideration should be given to the policy to ensure that new development outside of existing development areas is not provided for.	Consider the points raised in the submission in full
Ngai Tahu Property – Tanya Stevens	411.5	UFD-P2	Oppose	Oppose the submission in full	Waka Kotahi seeks that the change proposed by the submitter be rejected as new development should not be considered unless the criteria listed can be fulfilled.	Reject the submission
Ngai Tahu Property – Tanya Stevens	411.7	UFD-P8	Oppose	Oppose the submission in full	Waka Kotahi consider that any new industrial development should be located adjacent to existing development as this is likely to be more accessible by public transport and multi-modal transport options.	Reject the submission
Energy, Infrastructure and Transport						
EI – Pūngao me te hanganga hapori - Energy and infrastructure						
Kainga Ora – Homes and Communities – Brendon Liggett	325.26	EI-P5	Oppose	Oppose in part	The submitter seeks to amend EI-P5 to remove the reference to more than minor upgrades. Waka Kotahi does not support the removal of this reference as this could have implications for minor upgrades outside of a designation.	Reject the submission

Submitter Name/Contact	Submission Number	Chapter/ Provision	Support or oppose	The particular parts of the submission I support or oppose are:	The reasons for my/our support or opposition are:	I seek that the whole or part (describe part) of the submission be allowed or disallowed:
Federated Farmers of New Zealand Inc. – Peter Wilson	414.71	EI-P6	Oppose	Oppose the submission in full	The submitter seeks to remove EI-P6: Effects of other activities and developments on energy and infrastructure. This policy recognises the potential for other activities to adversely affect the operation of established infrastructure activities. Waka Kotahi seek that this policy be retained.	Reject this submission and retain the provision as notified.
Resource Management Group – Melanie Foote	249.88	EI-R35	Oppose	Oppose the submission in full	The submitter seeks to remove a matter of discretion related to the extent of the effects and replace this with the operational constraints. Waka Kotahi do not consider this appropriate as the potential effects on other infrastructure including the state highway would have no avenue to be considered.	Reject the submission
Incite - Chris Horne - on behalf of Chorus New Zealand, Spark New Zealand Trading Limited, Vodafone New Zealand Limited	62.32	EI-R18	Support	Support the submission in full	Waka Kotahi support the removal of clauses a. and c., as infrastructure providers have different requirements for attaching infrastructure to their assets and is managed by the infrastructure provider through their own standards. Therefore, Waka Kotahi consider it appropriate for these two clauses to be deleted.	Accept the submission
Incite - Chris Horne - on behalf of Chorus New Zealand, Spark New Zealand Trading	62.62	EI-R2	Support	Support the submission in full	Waka Kotahi support the inclusion of MD3: Operational considerations in relation to EIR2 as often there are few options when locating vehicle access tracks.	Accept the submission

Submitter Name/Contact	Submission Number	Chapter/ Provision	Support or oppose	The particular parts of the submission I support or oppose are:	The reasons for my/our support or opposition are:	I seek that the whole or part (describe part) of the submission be allowed or disallowed:
Limited, Vodafone New Zealand Limited						
Transpower New Zealand Limited - Ainsley McLeod	195.32	EI-R2	Support	Support the submission in full	The submitter proposes to remove the requirement to meet the applicable zone earthworks standard as earthworks are already required to meet specific standards set out in the Earthworks chapter. Waka Kotahi support this point.	Accept the submission
Resource Management Group – Melanie Foote	249.72	EI-R12	Oppose in part	Oppose the removal of MD14	The submitter seeks a range of amendments to this rule to provide for more flexibility when replacing a pole or tower and while Waka Kotahi does not have any comments on the proposed changes to the rule standards, the matter of discretion MD14: Extent of effects should be retained so that the potential effects of such a change to overhead infrastructure can be appropriately considered, including on the transport network.	Reject in part
Resource Management Group – Melanie Foote	249.74	EI-R13	Oppose in part	Oppose the removal of MD14	The submitter seeks a range of amendments to this rule to provide for more flexibility when adding equipment to a pole or tower and while Waka Kotahi does not have any comments on the proposed changes to the rule standards, the matter of discretion MD14: Extent of effects should be retained so that the potential effects of such a change to overhead infrastructure can be appropriately considered, including on the transport network.	Reject in part
Resource Management	249.75	EI-R15	Oppose in part	Oppose the removal of MD14	The submitter seeks a range of amendments to this rule to provide for more flexibility when replacing	Reject in part

Submitter Name/Contact	Submission Number	Chapter/ Provision	Support or oppose	The particular parts of the submission I support or oppose are:	The reasons for my/our support or opposition are:	I seek that the whole or part (describe part) of the submission be allowed or disallowed:
Group – Melanie Foote					an infrastructure cabinet or building and while Waka Kotahi does not have any comments on the proposed changes to the rule standards, the matter of discretion MD14: Extent of effects should be retained so that the potential effects of such a change can be appropriately considered, including on the transport network.	
Resource Management Group – Melanie Foote	249.76	EI-R16	Oppose in part	Oppose the removal of MD14	The submitter seeks a range of amendments to this rule to provide for more flexibility when upgrading above ground lines, ducts, cables and pipes and while Waka Kotahi does not have any comments on the proposed changes to the rule standards, the matter of discretion MD14: Extent of effects should be retained so that the potential effects of such a change can be appropriately considered, including on the transport network.	Reject in part
KiwiRail Holdings Limited – Sheena McGuire	373.26	EI-R6	Support	Support the submission in full	The submitter seeks to amend the advice note so that it better reflects the rule wording which states that the rule applies to tree trimming related to all infrastructure- not just overhead lines etc. Waka Kotahi support this amendment as it clarifies the scope for tree trimming required to maintain all infrastructure.	Accept the submission
Waimakariri District Council – Jim Harland	367.15	EI-RXX	Support in part	Support the insertion of a new rule subject to appropriate matters of discretion.	While Waka Kotahi does not oppose the addition of a new rule to specifically apply to large scale solar farms, an appropriate matter of discretion should be included to manage potential effects on the transport network – including safety (from glare) and construction effects. Either MD14 should apply	Accept the submission in part and include a relevant matter of discretion (likely MD14).

Submitter Name/Contact	Submission Number	Chapter/ Provision	Support or oppose	The particular parts of the submission I support or oppose are:	The reasons for my/our support or opposition are:	I seek that the whole or part (describe part) of the submission be allowed or disallowed:
					to this rule if accepted, or a new matter of discretion be included.	
Transpower New Zealand Limited – Ainsley McLeod	195.48	EI-MD4	Support	Accept the submission in full	Waka Kotahi agree that the matter of discretion should be expanded to cover impacts on safety as well as on human health as currently the provision only refers to human health.	Accept the submission
Transpower New Zealand Limited – Ainsley McLeod	195.50	EI-MD9	Support	Accept the submission in full	Waka Kotahi agrees with the submitter that reference to the relevant earthworks standards and mention of the benefits of infrastructure would assist in providing clarity to this matter.	Accept the submission
Transpower New Zealand Limited – Ainsley McLeod	195.51	EI-MD10	Support	Accept the submission in full	Waka Kotahi support the submitter in stating that the benefits of the infrastructure should be included as a matter of discretion in relation to the relocation of existing infrastructure.	Accept the submission
Resource Management Group – Melanie Foote	249.97	EI-MD2	Support	Accept the submission in full	Waka Kotahi support the recognition of the operational and functional needs of infrastructure to be located where they are as often there are few suitable alternatives. Recognition of this matter in this provision is suitable.	Accept the submission
Resource Management Group – Melanie Foote	249.104	EI-MD14	Oppose	Reject the submission in full	While Waka Kotahi do not expressly oppose the point raised by the submitter in terms of a catch-all provision being included. However, removal of this matter of discretion would potentially leave a gap in terms of properly addressing effects on transport infrastructure.	If the submission is to be accepted and MD14 removed, further consideration should be given to ensure effects on the transport network and existing infrastructure are appropriately captured.

Submitter Name/Contact	Submission Number	Chapter/ Provision	Support or oppose	The particular parts of the submission I support or oppose are:	The reasons for my/our support or opposition are:	I seek that the whole or part (describe part) of the submission be allowed or disallowed:
Transpower New Zealand Limited – Ainsley McLeod	195.25	EI-O2	Support in part	Accept the submission in full and consider original submission points made by Waka Kotahi	Waka Kotahi support the change proposed by the submitter to refer to the management of effects as opposed to avoid, remedy or mitigate, however, as per the original submission request that the functional and operational needs are also incorporated into the objective.	Accept the submission and make additional amendments requested by Waka Kotahi in its original submission.
Resource Management Group – Melanie Foote	249.52	EI-O1	Support in part	Accept intention, however, wording should be considered further to provide consistency across the plan	Waka Kotahi support the intent of this submission point, however, for consistency it would be better to refer to the functional and operational requirements.	Accept the submission in part
Resource Management Group – Melanie Foote	249.53	EI-O2	Support	Accept the submission in full	The point raised by the submitter reflects those raised by Waka Kotahi in its original submission, such that Waka Kotahi supports this submission point.	Accept the submission
Christchurch International Airport - Amy Hill	254.27	EI-O2	Support	Accept the submission in full	The point raised by the submitter reflects those raised by Waka Kotahi in its original submission, such that Waka Kotahi supports this submission point.	Accept the submission
Kainga Ora – Homes and Communities – Brendon Liggett	325.21	EI-O3	Oppose	Oppose the submission in full	This objective recognises the effects of other activities on existing infrastructure. The amendments proposed by the submitter are not supported by Waka Kotahi as the intent of the objective will be altered and it is unclear what level of effects would be considered acceptable.	Reject the submission
Royal Forest and Bird Protection	192.39	EI-P5	Oppose	Oppose the submission in full	Waka Kotahi consider that the clause proposed to be deleted by the submitter should be retained as in some instances it is not possible to avoid certain locations due to operational and functional	Reject the submission

Submitter Name/Contact	Submission Number	Chapter/ Provision	Support or oppose	The particular parts of the submission I support or oppose are:	The reasons for my/our support or opposition are:	I seek that the whole or part (describe part) of the submission be allowed or disallowed:
Society Inc. – Nicky Snoyink					requirements, such that offsetting should be considered.	
Christchurch International Airport – Amy Hill	254.30	EI-P5	Support in part	Accept intention, however, wording should be considered further to provide consistency across the plan.	Waka Kotahi support the intent of this submission point, however, for consistency it would be better to refer to the functional and operational requirements.	Accept the submission in part
TRAN – Ranga waka – Transport						
Boffa Miskell – Stephanie Styles on behalf of Summerset Retirement Villages	207.9	TRAN-R20	Oppose	Oppose an increase to the threshold under Table TRAN-1 for retirement villages to 250vmpd.	Waka Kotahi opposes an increase to the threshold as this has the potential to have an adverse effect on the state highway network. Waka Kotahi seeks to reserve the control to provide comment on an activity that generates high traffic volumes.	Reject the submission
Christchurch Internal Airport – Amy Hill	254.36	TRAN-P15	Support	Support the submission in full	Waka Kotahi supports the wording proposed by the submitter to strengthen the need to avoid adverse effects on infrastructure.	Accept the submission
George Jason Smith	270.13	TRAN-R2	Support	Amend TRAN-R2 to include the provisions of TRAN-R8 for new roads. Elevate the Activity Status of this rule to a level that will make departure from its provisions difficult. Amend all related Objectives, Rules and Matters of Discretion accordingly.	Waka Kotahi supports the provisions in TRAN-R8 to be included in TRAN-R2 for new road connections to be onto the lowest classification road.	Accept the submission

Submitter Name/Contact	Submission Number	Chapter/ Provision	Support or oppose	The particular parts of the submission I support or oppose are:	The reasons for my/our support or opposition are:	I seek that the whole or part (describe part) of the submission be allowed or disallowed:
Beca – Hugh Loughnan	277.21 277.22 277.23	TRAN-20 Table TRAN-1 Table TRAN-2	Support	Retain TRAN-20, Table TRAN-1 and Table TRAN-2 as notified	Waka Kotahi supports retaining these tables as they require an Integrated Transport Assessment for high traffic generating activities.	Accept the submission
Forme Planning Limited – Kay Panther Knight	282.81 282.140	Table TRAN-1 TRAN-R20	Oppose	Increase high traffic generation threshold	Waka Kotahi opposes an increase to the threshold as this has the potential to have an adverse effect on the state highway network. Waka Kotahi seeks to reserve the control to provide comment on an activity that generates high traffic volumes.	Reject the submission
4SIGHT CONSULTING LIMITED - Joy Morse	286.22 286.23	Table TRAN-1 TRAN-20	Oppose	TRAN-R20(1) and (2) shall not apply to service stations	Waka Kotahi opposes the exclusion of service stations from this rule and table as service stations are high traffic generators and could have adverse effects on the environment.	Reject the submission
Beca - Louisa Armstrong	303.24	TRAN-R6	Oppose	Oppose the submission in full	The submitter seeks to retain the rule as notified. However, while Waka Kotahi supports the access requirements as notified, this rule should include a notification clause so that any new accessway onto the state highway requires written approval from Waka Kotahi so that the potential effects on the state highway can be properly considered.	Reject submission
Kainga Ora – Homes and Communities - Brendon Liggett	325.81	TRAN-05	Support	Limited notification to road controlling authority	Waka Kotahi supports those amendments which would require written approval from Waka Kotahi where the consent authority considers it is necessary.	Accept the submission
Kainga Ora – Homes and	325.83	TRAN-R20	Oppose	Oppose the submission in full	Waka Kotahi considers that the ITA should not be specified to only 'non-residential activities' as	Reject the submission

Submitter Name/Contact	Submission Number	Chapter/ Provision	Support or oppose	The particular parts of the submission I support or oppose are:	The reasons for my/our support or opposition are:	I seek that the whole or part (describe part) of the submission be allowed or disallowed:
Communities - Brendon Liggett					residential activities can be high traffic generators and an ITA would assess the effects of the activity.	
Federated Farmers of New Zealand Inc. - Peter Wilson	414.91	TRAN-R22	Oppose	Oppose the submission in full	Retain the restricted discretionary status to determine whether there will be an adverse effect on the safety and structure of the road corridor.	Reject the submission
Kainga Ora – Homes and Communities - Brendon Liggett	325.82	Table TRAN-17	Oppose	Oppose the submission in full	Waka Kotahi consider that separation distances are necessary to manage effects of vehicles crossings within close proximity to road intersections.	Reject the submission
Christchurch International Airport Limited - Amy Hill	254.32	Introduction	Support	Land use and subdivision is managed to protect Waimakariri District's land transport corridors and infrastructure from incompatible activities that could undermine the provision of an integrated, safe, responsive, and sustainable land-based transport system, which includes the Strategic Transport Network and relevant infrastructure	Waka Kotahi supports the submission point around managing land use and subdivision to protect transport corridors and other infrastructure.	Accept the submission
Kainga Ora – Homes and	325.88	TRAN-MD2	Oppose	Oppose the removal of point 2	Waka Kotahi considers point 2, which addresses cumulative effects, should remain as notified as cumulative effects can have an adverse effect of	Reject the submission

Submitter Name/Contact	Submission Number	Chapter/ Provision	Support or oppose	The particular parts of the submission I support or oppose are:	The reasons for my/our support or opposition are:	I seek that the whole or part (describe part) of the submission be allowed or disallowed:
Communities - Brendon Liggett					the safety and efficiency of the state highway network.	
Kainga Ora – Homes and Communities - Brendon Liggett	325.90	TRAN-MD4	Oppose	Oppose the removal of points 4 and 10	Waka Kotahi considers that points 4 and 10 should be retained to address the potential effects vehicle crossings may have on pedestrian facilities and road frontages.	Reject the submission
Kainga Ora – Homes and Communities - Brendon Liggett	325.91	TRAN-MD5	Oppose	Oppose the removal of point 1	Waka Kotahi considers that pedestrian and cyclist movements across site frontages should be considered to assess potential effects on pedestrian and cyclist safety.	Reject the submission
KiwiRail Holdings Limited - Sheena McGuire	326.129	TRAN-MD22	Support	Retain TRAN-MD22 as notified.	Waka Kotahi supports TRAN-MD22. The safety and structure of the road corridor is essential for the safe and efficient operation of the transport network.	Accept the submission
KiwiRail Holdings Limited – Sheena McGuire	373.45	TRAN-MD19	Support	Retain TRAN-MD19 as notified.	Waka Kotahi supports TRAN-MD19. Assessment of extent of adverse effects on land transport infrastructure is essential for the safe and efficient operation of the transport network.	Accept the submission
KiwiRail Holdings – Sheena McGuire	373.100	TRAN-MD11	Support	Retain TRAN-MD11 as notified.	Waka Kotahi supports TRAN-MD11 as this will aid to identify and manage the adverse effects of high traffic generating activities on the transport system.	Accept the submission
Kainga Ora – Homes and Communities – Brendon Liggett	325.67	TRAN-O4	Oppose	The relief sought to delete 'avoided' in the notified provisions.	Waka Kotahi supports avoiding and managing adverse effects on the district's transport system from activities, including reverse sensitivity. However, Waka Kotahi consider that "avoided" should not be deleted from the objective. It is	Reject the submission

Submitter Name/Contact	Submission Number	Chapter/ Provision	Support or oppose	The particular parts of the submission I support or oppose are:	The reasons for my/our support or opposition are:	I seek that the whole or part (describe part) of the submission be allowed or disallowed:
					considered that removing the word "avoided" only requires adverse effects to be managed rather than avoided and that the effects should sought to be avoided in the first instance and if this is not possible, then measures for management should be considered.	
Christchurch International Airport – Amy Hill	254.35	TRAN-O4	Support in part	Support the submission in full	Waka Kotahi supports the changes proposed by the submitter.	Consider the changes proposed by the submitter in conjunction with the changes proposed by Waka Kotahi in its original submission.
Kainga Ora – Homes and Communities – Brendon Liggett	325.76	TRAN-P2	Oppose	Relief sought to amend TRAN-P2	Waka Kotahi considers that the amendments proposed by the submitter are difficult to interpret and apply in practice. Further consideration should be given to the strength of wording in this policy and the outcomes sought.	Further consider the wording proposed in conjunction with the original submission point made by Waka Kotahi in relation to clauses 6-8.
Kainga Ora – Homes and Communities – Brendon Liggett	325.79	TRAN-P15	Oppose	Oppose the submission in full	Waka Kotahi supports avoiding and managing adverse reverse sensitivity effects on the transport system. However, Waka Kotahi consider that "avoided" should not be deleted from the policy. It is considered that removing the word "avoided" only requires adverse effects to be managed rather than avoided and that the effects should sought to be avoided in the first instance and if this is not possible, then measures for management should be considered. Consistency with TRAN-O4 is sought in terms of retaining the use of avoid, remedy or	Reject the submission

Submitter Name/Contact	Submission Number	Chapter/ Provision	Support or oppose	The particular parts of the submission I support or oppose are:	The reasons for my/our support or opposition are:	I seek that the whole or part (describe part) of the submission be allowed or disallowed:
					mitigate so there is a clear hierarchy in the management of effects.	
Waimakariri District Council – Jim Harland	367.33	TRAN-P9	Support in part	Support changes to causes 1 and 2	Waka Kotahi supports the proposed changes to clauses 1 and 2 to reference the entire transport network and acknowledge the need for new development to design for active transport modes, however Waka Kotahi does not support the proposed changes to clause 3 which limit end of journey cycle facilities to specific zones.	Accept the submission in part
Beca – Hugh Loughnan	277.24	Table TRAN-3	Oppose	Oppose the submission in full	Educational facilities should be required to provide cycle parking and while Waka Kotahi does agree that in an ideal situation the market (educational facilities) should be able to dictate how much cycle parking is required and provided, this does not happen in practice and little cycle parking is provided.	Reject the submission
Kainga Ora – Homes and Communities – Brendon Liggett	325.84 325.85	Table TRAN-3 and Table TRAN-4	Oppose	Further consideration required on this submission point	The submitter seeks to delete Tables TRAN-3 and TRAN-4 in their entirety. Further investigation into what changes could be made to these tables is suggested.	Further consideration required on these submission points
Hazards and Risks						
NH – Matepā māhorahora - Natural Hazards						
Resource Management Group Limited	249.172	NH-P14	Support	The relief sought to amend the wording of clause 2 and 3(a) to recognise an operational need or functional need for new critical infrastructure, and the	Waka Kotahi supports those amendments seeking to better recognise and provide for the operational and functional needs of critical infrastructure.	Accept the submission

Submitter Name/Contact	Submission Number	Chapter/ Provision	Support or oppose	The particular parts of the submission I support or oppose are:	The reasons for my/our support or opposition are:	I seek that the whole or part (describe part) of the submission be allowed or disallowed:
				upgrade of existing critical infrastructure, in the fault overlays		
Canterbury Regional Council	316.79	NH-R4	Oppose	The relief sought to amend the provision to prevent any filling up to 0.25 metres above ground that is in an overland flow path	Critical infrastructure, by definition, includes the strategic transport network. Waka Kotahi considers that the amendment sought, to avoid filling in an overland flood path, would not always be achievable for the strategic transport network, given its linear nature.	Reject the submission
Canterbury Regional Council	316.80	NH-R5	Oppose	The relief sought to amend the provision to prevent any filling up to 0.25 metres above ground that is in an overland flow path	The amendment sought would prevent filling up to 0.25 m above ground level next to existing infrastructure. Waka Kotahi considers that this amendment could prevent the localised extension of existing infrastructure, like the state highway, which may be necessary to address a localised safety issue.	Reject the submission
Federated Farmers of New Zealand Inc	414.96	NH-P18	Oppose	Reject the submission in full	Waka Kotahi considers policy NH-P18 should not be deleted, as it seeks to manage the vehicle crash risk on roads, including state highways, affected by ice hazard through restrictions on planting of woodlots and shelterbelts. Waka Kotahi agrees with the submitter that plantation forestry and carbon forestry may also contribute to this risk and suggests that the provision be expanded to include them.	Reject the submission

Submitter Name/Contact	Submission Number	Chapter/ Provision	Support or oppose	The particular parts of the submission I support or oppose are:	The reasons for my/our support or opposition are:	I seek that the whole or part (describe part) of the submission be allowed or disallowed:
NFL- Āhuatanga o te whenua - Natural Features and Landscapes						
Transpower New Zealand Limited	195.84	General	Support	The relief sought to amend rule guidance section 'Other potentially relevant District Plan provisions' to specifically address infrastructure.	Waka Kotahi considers that it would assist Plan users to interpret and implement the Plan if this section, which lists other Plan chapters, also addressed the relationship between the provisions of the NFL and EI and TRAN chapters.	Accept the submission
Royal Forest and Bird Protection Society of New Zealand Inc	192.77	NFL-R4	Oppose	The relief sought to amend the rule to exclude public amenities that are not buildings from having permitted activity status under this rule	Waka Kotahi opposes the exclusion of structures that are public amenities, including cycleways and walkways, from this permitted activity rule, because this would consequently necessitate a resource consent to be obtained for these activities. We are of the view that additional conditions could be added to the permitted activity rule to manage the effects of larger scale cycleways and walkways.	Reject the submission
Royal Forest and Bird Protection Society of New Zealand Inc	192.74	NFL-P1	Oppose	The relief sought to add a further clause requiring 'avoiding any loss of indigenous biodiversity identified in policy ECO-P7'	Waka Kotahi is concerned that the absolute nature of this suggested amendment does not acknowledge that some activities, when considered in the context of the wider outcomes sought across the proposed Plan as a whole, might necessarily detract from the indigenous biodiversity values of Outstanding Natural Features. There may be instances where, in providing for the transport system, effects on indigenous biodiversity have been avoided, remedied or mitigated as far as practicable, but there is still some adverse effect on values of an outstanding natural features. Waka Kotahi consider a more nuanced approach is required.	Reject the submission

Submitter Name/Contact	Submission Number	Chapter/ Provision	Support or oppose	The particular parts of the submission I support or oppose are:	The reasons for my/our support or opposition are:	I seek that the whole or part (describe part) of the submission be allowed or disallowed:
Incite on behalf of Chorus New Zealand, Spark New Zealand Trading Limited and Vodafone New Zealand Limited	62.49	NFL-P4	Support	The relief sought to amend the provision to include consideration of EI-P5.	Waka Kotahi is supportive of the proposed amendment as policy EI-P5 provides a framework for managing the adverse effects of infrastructure within specified areas, and consider it appropriate that it is taken into account in this policy so that the relationship between EI-P5 and NFL-P4 is clear.	Accept the submission
Subdivision						
SUB - Wāwāhia whenua - Subdivision						
Horticulture New Zealand – Ailsa Robertson	295.100	SUB-MCD10	Support	The amendment to include consideration of reverse sensitivity effects	Waka Kotahi supports the inclusion of reverse sensitivity effects as part of the matter of control or discretion. However, the reverse sensitivity effects should also consider noise and vibration in additional to effects on rural production on surrounding land.	Accept part of the submission point to consider reverse sensitivity effects
Kainga Ora - Homes and Communities – Brendon Liggett	325.187	SUB-MCD10	Oppose	The relief seeks to amend the matter of control or discretion so that it only relates to effects in the rural environment	Waka Kotahi opposes the relief sought as it requests that the matters of control or discretion only relate to reverse sensitivity effects in the rural environment. Subdivision can occur in residential zones where reverse sensitivity effects, such as noise, are relevant and should also be considered.	Reject the submission
Waimakariri District Council – Jim Harland	367.64	SUB-MCD3	Support	The relief sought to include consideration of traffic safety effects	Waka Kotahi supports the relief sought that traffic safety should be included as a matter of control or discretion as it relates to property access.	Accept the submission
Christchurch International	254.43	SUB-O1	Support	The relief seeks to acknowledge that subdivision shall not give rise to adverse	The submission point is supported as Waka Kotahi agrees that any subdivision should not adversely	Accept the submission

Submitter Name/Contact	Submission Number	Chapter/ Provision	Support or oppose	The particular parts of the submission I support or oppose are:	The reasons for my/our support or opposition are:	I seek that the whole or part (describe part) of the submission be allowed or disallowed:
Airport Limited – Amy Hill				effects on strategic infrastructure	affect strategic infrastructure, which includes the state highway.	
Chapman Tripp - Jo Appleyard / Lucy Forrester - on behalf of Rolleston Industrial Developments Limited	160.5	SUB-P6	Oppose	The relief seeks to exclude Outline Development Plans in Ohoka to comply with the 15 lots or households per hectare requirement.	Waka Kotahi opposes the submitters request for the Ohoka area to be excluded from the 15 lots or households per hectare density requirement, which is the agreed density requirement for Greater Christchurch. The full reasons are set out in the Waka Kotahi submission on Proposed Plan Change 31.	Reject the submission
Fiona Aston	183.7	SUB-P6	Oppose	The relief seeks to delete the reference to 'no less than 12 households per hectare'	Waka Kotahi opposes the deletion of 'no less than 12 households per hectare' when there are demonstrated constraints. Any reduction in density would not be consistent with the outcomes sought by the Greater Christchurch Partnership.	Reject the submission
Fiona Aston	223.8	SUB-P6	Oppose	The relief seeks to delete the reference to 'no less than 12 households per hectare'	Waka Kotahi opposes the deletion of 'no less than 12 households per hectare' when there are demonstrated constraints. Any reduction in density would not be consistent with the outcomes sought by the Greater Christchurch Partnership.	Reject the submission
Fiona Aston	236.10	SUB-P6	Oppose	The relief seeks to delete the reference to 'no less than 12 households per hectare'	Waka Kotahi opposes the deletion of 'no less than 12 households per hectare' when there are demonstrated constraints. Any reduction in density would not be consistent with the outcomes sought by the Greater Christchurch Partnership.	Reject the submission
Fiona Aston	242.7	SUB-P6	Oppose	The relief seeks to delete the reference to 'no less than 12 households per hectare'	Waka Kotahi opposes the deletion of 'no less than 12 households per hectare' when there are demonstrated constraints. Any reduction in density	Reject the submission

Submitter Name/Contact	Submission Number	Chapter/ Provision	Support or oppose	The particular parts of the submission I support or oppose are:	The reasons for my/our support or opposition are:	I seek that the whole or part (describe part) of the submission be allowed or disallowed:
					would not be consistent with the outcomes sought by the Greater Christchurch Partnership.	
Fiona Aston	246.8	SUB-P6	Oppose	The relief seeks to delete the reference to 'no less than 12 households per hectare'	Waka Kotahi opposes the deletion of 'no less than 12 households per hectare' when there are demonstrated constraints. Any reduction in density would not be consistent with the outcomes sought by the Greater Christchurch Partnership.	Reject the submission
Kainga Ora	325.156	Subdivision – Policies	Support	Relief seeks to insert a new policy to provide for subdivision in accordance with a land use or building consent.	Waka Kotahi is comfortable with the proposed policy that seeks to provide for subdivision in accordance with a land use or building consent. The effects associated to the use of these sites can be managed at the land use consent stage.	Accept the submission
Ngāi Tahu Property – Tanya Stevens	411.31	SUB-P6	Oppose	The relief to include 'where possible' for each of the density requirements	The relief sought is opposed as if 15 lots or households per hectare cannot be achieved, and if there are demonstrated constraints, then 12 lots or households is appropriate. It is considered that to amend the policy to include the wording 'where possible' would not achieve the density requirements sought by the Greater Christchurch Partnership.	Reject the submission
General District-wide matters						
EW – Ketuketu whenua - Earthworks						
Chapman Tripp on behalf of Waimakariri Irrigation Limited	210.54	EW-S1	Support	The relief seeks to amend the standard to provide for earthworks for linear infrastructure	Waka Kotahi is supportive of the changes sought by the submitter, as they better provide for linear infrastructure and regionally significant infrastructure including state highways.	Accept the submission

Submitter Name/Contact	Submission Number	Chapter/ Provision	Support or oppose	The particular parts of the submission I support or oppose are:	The reasons for my/our support or opposition are:	I seek that the whole or part (describe part) of the submission be allowed or disallowed:
NZ Pork	169.22	EW-O1	Oppose	The relief seeks to delete the direct reference to earthworks being undertaken in a manner that minimises adverse effects on infrastructure	Waka Kotahi support the wording of this provision as notified.	Reject the submission
Horticulture New Zealand	295.101	EW-O1	Oppose	The relief seeks to delete the direct reference to earthworks being undertaken in a manner that minimises adverse effects on infrastructure	Waka Kotahi support the wording of this provision as notified.	Reject the submission
Fulton Hogan	41.35	EW-P6	Support	The relief seeks to require adverse effects on ground and surface water quality to be avoided, remedied or mitigated, as opposed to avoided entirely	Waka Kotahi agrees with the submitter that the notified wording of the policy requires absolute avoidance of adverse effects on water resources, without any consideration as to the type, scale or significance of the effects and the potential for those effects to be remedied or mitigated.	Accept the submission
LIGHT – Tūramarama - Light						
Woodend Sefton Community Board	155.6	General	Oppose	The relief seeks to require footpath lighting to be triggered by sensors	Waka Kotahi is concerned that streetlights turning on and off unpredictably could cause a distraction, and thereby safety risk, to highway motorists.	Reject the submission
NZ Pork	169.27	LIGHT-S1	Oppose	The relief seeks to delete LIGHT-S1 as it relates to new road corridors	Waka Kotahi opposes the changes sought by the submitter, as they seek to exclude light spill limits on activities adjacent to new road corridors, which do not take into consideration that excessive light	Reject the submission

Submitter Name/Contact	Submission Number	Chapter/ Provision	Support or oppose	The particular parts of the submission I support or oppose are:	The reasons for my/our support or opposition are:	I seek that the whole or part (describe part) of the submission be allowed or disallowed:
					spill onto roads can adversely affect the safe, efficient and effective functioning of the land transport network.	
NZ Pork	169.28	LIGHT-S2	Oppose	The relief seeks to delete LIGHT-S2 as it relates to existing roads, footpaths and cycle paths	Waka Kotahi opposes the changes sought by the submitter, as they seek to exclude measures to control glare from outdoor lighting on properties adjacent to roads, footpaths and cycleways, which does not take into consideration that glare from lighting can adversely affect the safe, efficient and effective functioning of the land transport network.	Reject the submission
Horticulture New Zealand	295.107	LIGHT-S1	Oppose	The relief seeks to delete LIGHT-S1 as it relates to new road corridors	Waka Kotahi opposes the changes sought by the submitter, as they seek to exclude light spill limits on activities adjacent to new road corridors, which do not take into consideration that excessive light spill onto roads can adversely affect the safe, efficient and effective functioning of the land transport network.	Reject the submission
Horticulture New Zealand	295.108	LIGHT-S2	Oppose	The relief seeks to delete LIGHT-S2 as it relates to existing roads, footpaths and cycle paths	Waka Kotahi opposes the changes sought by the submitter, as they seek to exclude measures to control glare from outdoor lighting on properties adjacent to roads, footpaths and cycleways, which do not take into consideration that glare from lighting can adversely affect the safe, efficient and effective functioning of the land transport network.	Reject the submission

Submitter Name/Contact	Submission Number	Chapter/ Provision	Support or oppose	The particular parts of the submission I support or oppose are:	The reasons for my/our support or opposition are:	I seek that the whole or part (describe part) of the submission be allowed or disallowed:
NOISE Te orooro – Noise						
KiwiRail Holdings Limited – Sheena McGuire	373.74	Noise	Support	The relief seeks to mitigate noise and vibration effects on all noise sensitive activities	Waka Kotahi supports the proposed amendment to the rule to include all noise sensitive activities not just residential activities.	Accept the submission
KiwiRail Holdings Limited – Sheena McGuire	373.74	NOISE–R16	Support	The amendment to extend the 80m distance to 100m in NOISE-R16	Waka Kotahi supports the distance being extended to 100m as noted in its primary submission, noise effects can cause negative effects on human health within 100m of the road corridor.	Accept the submission
Kainga Ora - Homes and Communities – Brendon Liggett	325.149	Noise – General	Oppose	Oppose the removal of additional requirements for indoor noise design	Waka Kotahi supports provisions relating to indoor noise design as a suitable measure to mitigate noise effects on human health.	Reject the submission
KiwiRail Holdings Limited – Sheena McGuire	373.75	NOISE-MD1	Support	Accept the submission in full	Waka Kotahi supports NOISE-MD1 as notified which includes effects on human health and well-being from noise generating activities	Accept the submission
KiwiRail Holdings Limited – Sheena McGuire	373.76	NOISE-MD2	Support	Accept the submission in full	Waka Kotahi supports NOISE-MD2 as notified as it considers the means specified for reducing noise effects to be adequate measures to mitigate effects of noise on human health.	Accept the submission
KiwiRail Holdings	373.77	NOISE-MD3	Support	Accept the submission in full	Waka Kotahi supports the consideration of other means of mitigation such as alternative	Accept the submission

Submitter Name/Contact	Submission Number	Chapter/ Provision	Support or oppose	The particular parts of the submission I support or oppose are:	The reasons for my/our support or opposition are:	I seek that the whole or part (describe part) of the submission be allowed or disallowed:
Limited – Sheena McGuire					technologies and materials, reporting from an acoustic specialist.	
Kiwi Rail Holdings Limited – Sheena McGuire	373.101	Noise – Matters of control/discretion	Support	The relief seeks to amend provisions to include all noise sensitive activities	Waka Kotahi agrees that noise sensitive receivers are not limited to residential activities and that the provisions should be amended to include all noise sensitive activities.	Accept the submission
Horticulture New Zealand Limited – Ailsa Robertson	295.111	NOISE-O2	Oppose	Oppose the submission in full	Waka Kotahi supports the notified version of NOISE-O1 particularly the wording relating to noise and its effect on human health.	Reject the submission
SIGN – Ngā tohu – Signs						
Canterbury District Health Board – Edward Griffiths	68.2	SIGN - R6	Oppose	Oppose the submission in full	As per the original submission by Waka Kotahi, there should be appropriate standards related to this rule to manage the content of on-site signs. The submitter seeks to retain the rule as notified with no standards which Waka Kotahi does not agree with.	Reject the submission in full and further consider appropriate standards.
Go Media Limited – Resource Management Group	234.7	SIGN – R7	Oppose	Oppose the submission in full	The submitter seeks to widen the scope of R7 (any off-site sign) to provide for a permitted activity pathway and for those signs that do not comply with relevant standards to fall to a restricted discretionary activity status (non-complying currently proposed). Waka Kotahi do not support this submission point and request that the rule be retained as notified to adequately control potential adverse effects from off-site signs, particularly adverse effects of safety on the transport network	Reject the submission

Submitter Name/Contact	Submission Number	Chapter/ Provision	Support or oppose	The particular parts of the submission I support or oppose are:	The reasons for my/our support or opposition are:	I seek that the whole or part (describe part) of the submission be allowed or disallowed:
					if located at inappropriate locations. The standards proposed by the applicant for new rules do not align with conditions sought by Waka Kotahi to manage signage, particularly digital billboards.	
Ravenswood Developments Limited (RDL) – Sarah Everleigh-Anderson Lloyd	347.19	SIGN – R7	Support in part	Support further consideration of activity status amendment subject to appropriate standards	Waka Kotahi is not opposed to this submission point and consideration of a restricted discretionary activity status for off-site signs in commercial zones, however, appropriate matters of control including traffic safety should be imposed.	Consider imposing appropriate standards to control off-site signs in a commercial zone
Aurecon New Zealand Limited – Mark Allan	408.29	SIGN – R9	Support	Support further consideration of activity status amendment subject to appropriate standards	While Waka Kotahi agree that the non-complying activity status for subdivision development entrance signs is restrictive. However, Waka Kotahi does not support a permitted activity status as this could lead to a proliferation of signs visible from the state highway at each site. Consideration to appropriate standards and cumulative effects should be given if the activity status is to be amended.	Further consider appropriate controls and matters of discretion
Go Media Limited – Resource Management Group	234.4	SIGN – P1	Oppose	Oppose the submission in full	Waka Kotahi seeks that this submission point be rejected as the policy seeks to enable specific signs of which off-site signs (excluding directional signs) are not included. Other off-site signs are subject to the other policies proposed.	Reject this submission
Go Media Limited – Resource Management Group	234.5	SIGN – P3	Oppose	Oppose the submission in full	As per its original submission, Waka Kotahi sought to alter this provision to reference the safe, efficient and effective operation of the transport system. The submitter seeks to amend the provision to remove the reference to limiting digital signs and	Reject this submission

Submitter Name/Contact	Submission Number	Chapter/ Provision	Support or oppose	The particular parts of the submission I support or oppose are:	The reasons for my/our support or opposition are:	I seek that the whole or part (describe part) of the submission be allowed or disallowed:
					managing or avoiding signs in industrial or other zones. Waka Kotahi do not think this is appropriate.	
Go Media Limited – Resource Management Group	234.8	SIGN – S2	Oppose	Oppose the submission in full	Sign standard – S3 manages digital signs and Waka Kotahi considers it more appropriate for signs to be managed through this standard as opposed to being incorporated into Sign standard - S2.	Reject this submission
Go Media Limited – Resource Management Group	234.9	SIGN – S3	Oppose	Oppose the submission in full	Waka Kotahi do not support the submitters points to remove the maximum area, number of images/messages and the display time as the submitter has not proposed any alternative standards rather, proposes to delete them entirely.	Reject this submission
Aurecon New Zealand Limited – Mark Allan	267.20	SIGN – S2	Oppose	Oppose the submission in full	Waka Kotahi do not support specific exemptions for supermarket signage and do not consider that this type of signage should be treated differently to other commercial signage as the potential effects are no different.	Reject this submission
Forme Planning Limited – Kay Panther Knight	282.80	SIGN – S2	Oppose	Oppose the submission in full	Waka Kotahi do not support specific standards for supermarket signage and do not consider it should be treated differently to other commercial signage as the potential effects are no different.	Reject this submission
TEMP – Ngā mahi taupua - Temporary activities						
Clayton Tikao	28.1	TEMP-R4	Oppose	The relief sought to increase the vehicle movements per day for filming activities	Waka Kotahi opposes the changes sought by the submitter as this would double the number of vehicle movements permitted under this rule. The number of vehicle movements sought by the submitter is significant and the effects of this number of vehicle movements from a site onto a	Reject the submission

Submitter Name/Contact	Submission Number	Chapter/ Provision	Support or oppose	The particular parts of the submission I support or oppose are:	The reasons for my/our support or opposition are:	I seek that the whole or part (describe part) of the submission be allowed or disallowed:
					state highway could significantly adversely impact the safe, efficient and effective functioning of the highway.	
New Zealand Defence Force	166.25	TEMP-R5	Oppose	The relief sought to delete TEMP-MD2 Transport as a matter of discretion if a consent is required	Waka Kotahi seeks to ensure that any effects on the state highway arising from a temporary military training activity extending beyond 31 days duration are appropriately managed, which the notified provision sought to do and for this reason it should be retained.	Reject the submission
Beca – Louise Armstrong	303.49	General	Oppose	The relief sought for a new rule to allow Emergency Services Training Activity, and specifically no restriction on vehicle movements per day	Waka Kotahi is not generally opposed to the new permitted activity rule sought by the submitter, but would seek to ensure that the vehicle movements were restricted to 250 per day beyond which a requirement for resource consent would be triggered. This threshold for vehicle movements aligns with the limit imposed in other TEMP rules.	Reject the submission, unless a vehicle movement limit of 250 veh/day is included
Part 3 – Area specific matters						
Zones						
RURZ – Whaitua Taiwhenua - Rural Zones						
George Jason Smith	270.8	GRUZ-R2	Support	The relief sought to replace 'paved' with 'formed' public road	Waka Kotahi support the change sought by the submitter as typically Waka Kotahi would refer to a road as being 'sealed' or 'formed' as opposed to 'paved'.	Support the submission
Federated Farmers of New Zealand Inc	414.45	RURZ-MD4	Oppose	Oppose the submission in full	Waka Kotahi opposes the deletion of this provision as suggested by the submitter, as, in clause (4) it seeks to manage the shading effects of forestry, carbon forest and woodlots on the transport network. Shading effects can pose a safety risk on	Reject the submission

Submitter Name/Contact	Submission Number	Chapter/ Provision	Support or oppose	The particular parts of the submission I support or oppose are:	The reasons for my/our support or opposition are:	I seek that the whole or part (describe part) of the submission be allowed or disallowed:
					the state highway and Waka Kotahi supports the retention of this provision to ensure such effects are appropriately considered.	
Wāhanga waihanga - Development Areas						
New Development Areas						
WR – West Rangiora						
Ruth and Bruno Zahner	213.3 213.5	Developme nt Areas WR-West Rangiora	Oppose	Request for a reduced minimum density of 12 households per hectare	The Greater Christchurch Partnerships agreed to a minimum of 15 households per hectare unless there are demonstratable infrastructure constraints. The submitter has not provided evidence to demonstrate that there are infrastructure constraints, such that the 15 households per hectare standard should be retained.	Reject that part of the submission that seeks to reduce the minimum density of households per hectare from 15 to 12.

Names and addresses of submitters on the Proposed Waimakariri District Plan

Submission numbers	Submitters	Email
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3	Angus Robertson Mechanical Limited Attention: Seamus Robertson	seamus@rollform.co.nz
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98	Keswick Farm Dairies Limited C/- Planz Consultants Attention: Andrew Ross	chch@planzconsultants.co.nz
99	K Fletcher	kfletcher.mediator@xtra.co.nz
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101	Borcoskie M J & R M C/- Charlie Brown	charlie@rhodes.co.nz
102	M J Borcoskie Family Trust C/- Charlie Brown	charlie@rhodes.co.nz
103	M and J Cotter	jennychrisrose@hotmail.com

104	J Elvidge	Not applicable
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114	J Renwick	Not applicable
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