

OFFICER'S REPORT FOR:

Hearing Panel:

SUBJECT:

**Proposed Waimakariri District Plan: Rautaki
ahunga - Strategic Directions**

PREPARED BY:

Mark Buckley

REPORT DATED:

13 April 2023

DATE OF HEARING:

**Stream 1 & 2
15 - 18 May 2023**

Executive Summary

1. This report considers submissions received by the Waimakariri District Council in relation to the relevant objectives, policies, rules, definitions, appendices and maps of the Proposed District Plan as they apply to the Strategic Directions chapter. The report outlines recommendations in response to the issues that have emerged from these submissions.
2. There were a number of submissions and further submissions received on the Strategic Directions chapter. The submissions received were diverse and sought a range of outcomes. The following are considered to be the key issues in contention in the chapter:
 - Compliance with higher order documents;
 - The removal of housing constraints;
 - Increased emphasis on infrastructure;
 - Reverse sensitivity effects; and
 - Protection of highly productive land.
3. This report addresses each of these matters, as well as any other issues raised by submissions.
4. Strategic Directions chapter is also subject to a number of consequential amendments arising from submissions to the whole of the Proposed Plan and other chapters.
5. I have recommended some changes to the Proposed Plan provisions to address matters raised in submissions and are summarised below:
 - Indigenous biodiversity overall net gain;
 - Well-functioning urban environment; and
 - Primary production.
6. Having considered all the submissions and reviewed all relevant statutory and non-statutory documents, I recommend that the Proposed Plan should be amended as set out in section **Appendix A** of this report.
7. For the reasons set out in the Section 32AA evaluation and included throughout this report, I consider that the proposed objectives and provisions, with the recommended amendments, will be the most appropriate means to:
 - achieve the purpose of the RMA where it is necessary to revert to Part 2 and otherwise give effect to higher order planning documents, in respect to the proposed objectives; and
 - achieve the relevant objectives of the Proposed Plan, in respect to the proposed provisions.

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Interpretation

8. Parts A and B of the Officer's reports utilise a number of abbreviations for brevity as set out in Tables 1 and 2 below:

Table 1: Abbreviations

Abbreviation	Means
Amendment Act	Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 1991
District Council	Waimakariri District Council / territorial authority
Operative Plan	Operative Waimakariri District Plan
Proposed Plan	Proposed Waimakariri District Plan
ECan	Environment Canterbury/Canterbury Regional Council
NES	National Environmental Standard
NESAQ	National Environmental Standards for Air Quality 2004
NESCS	National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health 2011
NESETA	National Environmental Standards for Electricity Transmission Activities 2009
NESF	National Environmental Standards for Freshwater 2020
NESPF	National Environmental Standards for Plantation Forestry 2017
NESTF	National Environmental Standards for Telecommunication Facilities 2016
NPS	National Planning Standard
NPSHPL	National Policy Statement on Highly Productive Land
NPSET	National Policy Statement on Electricity Transmission 2008
NPSFM	National Policy Statement for Freshwater Management 2020
NPSUD	National Policy Statement on Urban Development 2020
NPSREG	National Policy Statement for Renewable Electricity Generation 2011
NZCPS	New Zealand Coastal Policy Statement 2010
PNPSIB	Proposed National Policy Statement on Indigenous Biodiversity 2022
RMA	Resource Management Act 1991
RPS	Operative Canterbury Regional Policy Statement

Table 2: Abbreviations of Submitters' Names

Abbreviation	Means
Bellgrove	Bellgrove Rangiora Limited
CCC	Christchurch City Council
CDHB	Christchurch District Health Board
Chorus	Chorus New Zealand Ltd
CIAL	Christchurch International Airport Ltd
Corrections	Ara Poutama Aotearoa the Department of Corrections
DoC	Department of Conservation Te Papa Atawhai
ECan	Environment Canterbury / Canterbury Regional Council

Abbreviation	Means
Federated Farmers	Federated Farmers of New Zealand Inc.
FENZ	Fire and Emergency New Zealand
Fish and Game	North Canterbury Fish and Game Council
Forest and Bird	Royal Forest and Bird Protection Society
Heritage NZ	Heritage New Zealand Pouhere Taonga
Hort NZ	Horticulture New Zealand
Kainga Ora	Kainga Ora - Homes and Communities
KiwiRail	KiwiRail Holdings Limited
Mainpower	Mainpower New Zealand Ltd
MoE	Minister / Ministry of Education
Ngāi Tūāhuriri	Te Ngāi Tūāhuriri Rūnanga
Ravenswood	Ravenswood Developments Ltd
Spark	Spark New Zealand Trading Ltd
Tuhaitara Trust	Te Kohaka o Tuhaitara Trust
Transpower	Transpower New Zealand Ltd
Vodafone	Vodafone New Zealand Ltd / One.NZ
WDC	Waimakariri District Council (including as requiring authority)
Waka Kotahi	Waka Kotahi NZ Transport Agency

In addition, references to submissions includes further submissions, unless otherwise stated.

1 Introduction

1.1 Purpose

9. The purpose of this report is to provide the Hearing Panel with a summary and analysis of the submissions received on the Strategic Directions chapter and to recommend possible amendments to the Proposed Plan in response to those submissions.
10. This report is prepared under section 42A of the RMA. It considers submissions received by the District Council in relation to the relevant strategic directions objectives, objectives, policies, rules, definitions, appendices and maps as they apply to the Strategic Directions chapter in the Proposed Plan. The report outlines recommendations in response to the key issues that have emerged from these submissions.
11. This report discusses general issues or topics arising, the original and further submissions received following notification of the Proposed Plan, makes recommendations as to whether or not those submissions should be accepted or rejected, and concludes with a recommendation for changes to the Proposed Plan provisions or maps based on the preceding discussion in the report.
12. This report is provided to assist the Hearings Panel in their role as Independent Commissioners. The Hearings Panel may choose to accept or reject the conclusions and recommendations of this report and may come to different conclusions and make different recommendations, based on the information and evidence provided to them by submitters.
13. This report is intended to be read in conjunction with Officers' s42A Report: Part A – Overarching and Part 1 matters which contains factual background information, statutory context and administrative matters pertaining to the district plan review and Proposed Plan. This report should also be read in conjunction with the s42A report: Urban Form and Development.

1.2 Author

14. My name is Mark Thomas Buckley. My qualifications and experience are set out in **Appendix D** of this report.
15. My role in preparing this report is that of an expert planner.
16. I was involved in the preparation of the Proposed Plan and authored the Section 32 Evaluation Reports for Natural Character of Freshwater Bodies, Variation 1 Housing Intensification (Qualifying Matter Airport Noise) and Variation 2 Financial Contributions. I was the lead in ensuring the various chapters in the Proposed Plan were integrated.
17. Although this is a District Council Hearing, I have read the Code of Conduct for Expert Witnesses contained in the Practice Note issued by the Environment Court 2023. I have complied with that Code when preparing my written statement of evidence and I agree to comply with it when I give any oral evidence.
18. The scope of my evidence relates to Strategic Directions. I confirm that the issues addressed in this statement of evidence are within my area of expertise as an expert policy planner.

19. Any data, information, facts, and assumptions I have considered in forming my opinions are set out in the part of the evidence in which I express my opinions. Where I have set out opinions in my evidence, I have given reasons for those opinions.
20. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

1.3 Supporting Evidence

21. There was no expert evidence, literature, legal cases or other material which I have used or relied upon in support of the opinions expressed in this report.
22. I have included a copy of Map A from the RPS for reference in **Appendix E**.

1.4 Key Issues in Contention

23. A number of submissions and further submissions were received on the provisions relating to Strategic Directions. The submissions received were diverse and sought a range of outcomes; including for example infrastructure, soils, natural hazards, and reverse sensitivity.
24. I consider the following to be the key issues in contention in the chapter:
 - How the plan complies with higher order documents,
 - The removal of housing constraints,
 - Increased emphasis on infrastructure,
 - Reverse sensitivity effects, and
 - Protection of highly productive land.
25. I address each of these key issues in this report, as well as any other issues raised by submissions.

1.5 Procedural Matters

26. At the time of writing this report there have not been any pre-hearing conferences, clause 8AA meetings or expert witness conferencing in relation to submissions on this Strategic Directions.

2 Statutory Considerations

2.1 Resource Management Act 1991

27. The Proposed Plan has been prepared in accordance with the RMA and in particular, the requirements of:
- section 74 Matters to be considered by territorial authority, and
 - section 75 Contents of district plans.
28. There are a number of higher order planning documents and strategic plans that provide direction and guidance for the preparation and content of the Proposed Plan. These documents are discussed in detail within the Section 32 Evaluation Report: Strategic Directions, and in the case of more recent national guidance within the various Section 42A reports where the matters best sit.
29. For higher order documents that have subsequently been released after the Section 32 analysis, Part A – Overarching Review Matters of the Section 42A Part 1 Introduction report covers those documents. The relevant analysis of submission points against those documents occurs in Section 3 of this report.

2.2 Section 32AA

30. I have undertaken an evaluation of the recommended amendments to provisions since the initial section 32 evaluation was undertaken in accordance with s32AA . Section 32AA states:

32AA Requirements for undertaking and publishing further evaluations

(1) A further evaluation required under this Act—

(a) is required only for any changes that have been made to, or are proposed for, the proposal since the evaluation report for the proposal was completed (the changes); and

(b) must be undertaken in accordance with section 32(1) to (4); and

(c) must, despite paragraph (b) and section 32(1)(c), be undertaken at a level of detail that corresponds to the scale and significance of the changes; and

(d) must—

(i) be published in an evaluation report that is made available for public inspection at the same time as the approved proposal (in the case of a national policy statement or a New Zealand coastal policy statement or a national planning standard), or the decision on the proposal, is notified; or

(ii) be referred to in the decision-making record in sufficient detail to demonstrate that the further evaluation was undertaken in accordance with this section.

(2) To avoid doubt, an evaluation report does not have to be prepared if a further evaluation is undertaken in accordance with subsection (1)(d)(ii).

31. The required section 32AA evaluation for changes proposed as a result of consideration of submissions with respect to Strategic Directions is contained within the assessment of the relief

sought in submissions in section 3 of this report / appended to this report as **Appendix C**, as required by s32AA(1)(d)(ii).

2.3 Trade Competition

32. Trade competition is not considered relevant to the Strategic Directions provisions of the Proposed Plan.
33. There are no known trade competition issues raised within the submissions.

3 Consideration of Submissions and Further Submissions

3.1 Overview

34. For Strategic Directions there are 45 original submitters of which 41 wish to be heard over a total of 127 submission points. Subsequently there were 53 further submissions. In general, the submissions wanted recognition of the importance of specific organisations on a district wide basis. Some submissions also wanted provisions within Strategic Directions to be amended to the wording used in the NPSUD.
35. There are 14 submissions on the Introduction for Strategic Directions. Two were in support of the introduction as it was written and 12 wanted amendments to the Introduction. Three of the submissions that wanted amendments to the Introduction had further submissions that opposed their submission.
36. There are 14 submissions on SD-O1 Natural Environment, with four submissions wanting amendments and eight submissions in support. There were five further submissions, two in support and three opposed. The two in support were on submissions that proposed amendments and only one was against an amendment in opposition.
37. There are 35 submissions on SD-O2 Urban Development, with ten in support, two in opposition and 23 wanting amendments. There are 28 further submission, 14 in support of amendments, two in support of retaining the objective as written, and 12 in opposition to amendments.
38. There are 18 submission on SD-O3 Energy and Infrastructure, with seven wanting amendments, 11 in support as written and none in opposition. There are seven further submissions, three in support and three in opposition of amendments. There is one further submission in opposition of a submission to retain the wording of the objective.
39. There are 23 submissions on SD-O4 Rural Land, 12 wanting amendments, 5 in support, 3 opposed and 3 neutral. There are 11 further submissions, five in support and six in opposition. All but one relates to proposed amendments, one was in support of the neutral stance.
40. There are 11 submissions on SD-O5 Ngāi Tahu mana whenua/Te Ngāi Tūāhuriri Rūnanga, four wanting amendments, four in support and three neutral. There are four further submissions, two in support of one amendment, one opposed to the neutral position and one opposed to a proposed amendment.
41. There are 12 submissions on SD-O6 Natural Hazards and Resilience, four wanting amendments and eight in support of the objective. There are three further submissions, one in support of an amendment and two in opposition to retaining the existing wording of the objective.
42. In addition to further submissions on specific point, there were also general submissions by further submitters in opposition or support of the whole submission by original submitters. The further submissions have not been assessed against specific submission points because of the generic nature of the submission. The further submissions are listed in the Table 3 below:

Table 3: General Further Submissions

Further submitter	FS number	Provision	Submission number	Original submitter	Support / oppose	Outcome sought
I.W and L.M. Bisman	38	Whole submission	160	Rolleston Industrial Developments	Oppose	Oppose
Waimakariri District Council	48	Whole submission	160	Rolleston Industrial Developments Ltd	Oppose	Disallow
Martin Hewitt	60	Whole submission	160	Rolleston Industrial Developments	Oppose	Whole disallowed
Steven Holland	72	Whole submission	160	Rolleston Industrial Developments	Oppose	Whole disallowed
Michelle Holland	73	Whole submission	160	Rolleston Industrial Developments	Oppose	Whole disallowed
Val & Ray Robb	74	Whole submission	160	Rolleston Industrial Developments	Oppose	Whole disallowed
Edward & Justing Hamilton	75	Whole submission	160	Rolleston Industrial Developments	Oppose	Whole disallowed
David & Elaine Brady	130	Whole submission	160	Rolleston Industrial Developments	Oppose	Disallow
Jan Hadfield	132	Whole submission	160	Rolleston Industrial Developments	Oppose	Disallow
Emma Wood	136	Whole submission	160	Rolleston Industrial Developments	Oppose	Disallow
MainPower NZ Ltd	58	Whole submission	325	Kainga Ora	Oppose	
Richard & Geoff Spark	37	Whole submission	325	Kainga Ora		Disallow
Miranda Hales	46	Whole submission	325	Kainga Ora	Oppose	Disallow
Bellgrove Rangiora Ltd	85	Whole submission	325	Kainga Ora	Oppose	Disallow
R J Paterson Family Trust	91	Whole submission	325	Kainga Ora		Allow in part
Richard & Geoff Spark	37	Whole submission	360	Christchurch City Council		
Miranda Hales	46	Whole submission	360	Christchurch City Council	Oppose	Reject

CIAL	80	Whole submission	360	Christchurch City Council	Support	Accept
Richard & Geoff Spark	37	Whole submission	408	Bellgrove Rangiora Ltd		
Kainga Ora	88	Whole submission	207.1 - 207.49	Summerset Retirement Villages (Rangiora) Ltd	Oppose	Disallow
Kainga Ora	88	Whole submission	254.01 - 254.155	Christchurch International Airport Ltd	Oppose	Disallow
DEXIN Investment Ltd	101	Whole submission	416.1 - 416.15	Sports & Education Corporation	Support	Allow
Forest & Bird	78	Whole submission	419.1 - 419.155	Department of Conservation	Support	
R J Paterson Family Trust	91	223.1 - 223.15 Covers Planning Maps, SD, UFD, SUB, RESZ, GRZ, WR	223	John and Coral Broughton		Allow in Part
FS Damian & Sarah Elley	28	236.1 - 236.28 covers PLANNING MAPS, SD, UFD, SUB, LLRZ, RESZ	236	Rick Allaway & Lionel Larsen	Support	
FS JP Bailey Family Trust	29	236.1 - 236.28 covers PLANNING MAPS, SD, UFD, SUB, LLRZ, RESZ	236	Rick Allaway & Lionel Larsen	Support	
FS Kim Manson & Neihana Kuru	30	236.1 - 236.28 covers PLANNING MAPS, SD, UFD, SUB, LLRZ, RESZ	236	Rick Allaway & Lionel Larsen	Support	
FS Ross Fraser	31	236.1 - 236.28 covers PLANNING MAPS, SD,	236	Rick Allaway & Lionel Larsen	Support	

		UFD, SUB, LLRZ, RESZ				
FS L N R deLacy	32	236.1 - 236.28 covers PLANNING MAPS, SD, UFD, SUB, LLRZ, RESZ	236	Rick Allaway & Lionel Larsen	Support	
FB Louise Marriott	33	236.1 - 236.28 covers PLANNING MAPS, SD, UFD, SUB, LLRZ, RESZ	236	Rick Allaway & Lionel Larsen	Support	
Bellgrove Rangiora Ltd	85	242.1 - 242.14 covers PLANNING MAPS, SD, UFD, SUB, RESZ, GRZ, GENERAL	242	Dalkeith Holdings Ltd	Oppose	Disallow
Bellgrove Rangiora Ltd	85	246.1 - 246.16 covers PLANNING MAPS, WR, SD, UFD, SUB, RESZ, GRZ, GENERAL	246	Miranda Hales		Disallow
Richard & Geoff Spark	37	Whole submission	295	Horticulture NZ	Oppose	Disallow
CIAL	80	Whole submission	295	Horticulture NZ	Support	Accept
CIAL	80	Whole submission	316	Canterbury Regional Council	Support	Accept
Rachel Hobson & Bernard Whimp	90	Whole submission	316	Canterbury Regional Council		Disallow in part

43. My recommendations in relation to further submissions reflect the recommendations on the relevant primary submission.

3.1.1 Report Structure

44. Submissions on Strategic Directions raised a number of issues which have been grouped into sub-topics within this report. Some of the submissions are addressed under a number of topic headings based on the topics contained in the submission. I have considered substantive commentary on primary submissions contained in further submissions as part of my consideration of the primary submission(s) to which they relate.
45. In accordance with Clause 10(3) of the First Schedule of the RMA, I have generally undertaken the following evaluation on both an issues and provisions-based approach, as opposed to a submission-by-submission approach. The submissions from Woolworths will be treated as a whole given they all want the same general outcome.
46. Due to the number of submission points, this evaluation is generic only and may not contain specific recommendations on each submission point, but instead discusses the issues generally. This approach is consistent with Clause 10(2)(a) of Schedule 1 to the RMA. Specific recommendations on each submission / further submission point are contained in **Appendix B**.
47. Some submission points may request multiple changes to an objective that are relevant for different topics. The assessment of these submissions will occur across multiple topics below and may or may-not include partial amendments.
48. The following evaluation should be read in conjunction with the summaries of submissions and the submissions themselves. Where I agree with the relief sought and the rationale for that relief, I have noted my agreement, and my recommendation is provided in the summary of submission table in **Appendix B**. Where I have undertaken further evaluation of the relief sought in a submission(s), the evaluation and recommendations are set out in the body of this report. I have provided a marked-up version of the chapter with recommended amendments in response to submissions as **Appendix A**.
49. This report only addresses definitions that are specific to this topic. Definitions that relate to more than one topic have been addressed in the most relevant hearings report.

3.1.2 Format for Consideration of Submissions

50. For each identified topic, I have considered the submissions that are seeking changes to the Proposed Plan in the following format:
 - Matters raised by submitters,
 - Assessment,
 - Summary of recommendations, and
 - Section 32AA evaluation.
51. The recommended amendments to the relevant chapter/s are set out in in **Appendix A** of this report where all text changes are shown in a consolidated manner.
52. I have undertaken the s32AA evaluation in a consolidated manner following the assessment and recommendations on submissions in this section, which is attached at **Appendix B and C**.
53. In these cases, recommendations in relation to these further submissions reflect the recommendations on the relevant primary submission.

3.2 Strategic Directions General Submissions

3.2.1 *Matters raised by submitters*

54. Numerous submissions raised general RMA matters in relation to the Proposed District Plan, including the following:
- Hierarchy of Strategic Directions across the rest of the Proposed District Plan,
 - Inclusion of reference to resource consents, and
 - The use of wording from the NPSUD and the RMA.
55. A number of submitters have requested that Council amend the Proposed Plan to be consistent with the wording in the RMA and the NPSUD. District plan policy is required to give effect to higher order documents (Section 75(3) RMA). In giving effect to these documents, the Proposed Plan does not need to include the exact wording from the higher order documents, but use the direction given in those documents to formulate a set of policies that implement the direction given in those documents while reflecting the local context and environment. However, in some circumstances councils may be directed to include the exact wording for objectives and policies within their district plans, such as the Amendment Act.

3.2.2 *Assessment*

56. The NPS¹ states that the intent of Strategic Directions within a district plan is to provide an outline of key strategic or significant resource management matters for the district and the objectives guide the decision making at a strategic level. It is not intended to contain provisions or rules that deal with specific activities or the effects of those activities. The submissions by MainPower [249.197] and Kainga Ora [325.1] requesting that a statement be included noting that Strategic Direction has primacy over other objectives and policies of the proposed plan is inconsistent with the approach in the NPS and the intent of Strategic Directions. This is not consistent with the approach taken by Central Government within the various national policy statements or ECan within its various resource management plans. Section 3.1 of the Section 32 for Strategic Directions states:

It is noted that there is nothing in the NPS to suggest that there is a hierarchy amongst objectives that must or may be included in the proposed plan or that there is a requirement that they are assessed against each other. Chapter 7, cl 1(b) simply stipulates that objectives that address key strategic matters for the district and guide decision making at a strategic level must be located under the strategic heading. The NPS does not suggest that strategic objectives be any more than to guide decision making at a strategic level. In addition, there is nothing in the NPS preventing a District Council from determining how they wish their strategic objectives to be interpreted.

57. The Proposed Plan discusses the process around resource consents in the 'How the plan works' heading in the 'General Approach' chapter. The chapter details how resource consents are to be assessed in relation to the proposed plan. The submitters: Clampett Investments Limited [submission 284.32] and Rolleston Industrial Developments Limited [submission 326.34]

¹ Refer Section 7 District-wide Matters Standard, Mandatory directions for Strategic Directions 1 – 4, page 32

- wanted an additional statement in the introduction requiring resource consent applications to have specific consideration of strategic objectives under section 104(1)(b)(vi) of the RMA. Forest and Bird [submission 192.28] wanted a reference to resource consents in the introduction. This is covered under the General Approach chapter and does not need to be repeated in Strategic Directions. Directing that strategic objectives should have specific consideration is inconsistent with plan implementation, where all relevant objectives and policies should be considered for resource consent applications, without applying a hierarchical approach.
58. Several submitters want the inclusion of wording from the NPSUD included into the objectives of Strategic Directions chapter. As outlined above [48], the District Plan is required to give effect to higher order documents by being consistent with the direction and outcomes within those documents. The Department of Corrections [submission 52.3] wanted the inclusion of “enables the community to provide for their wellbeing” into objective SD-O2 to achieve the purpose of the RMA and give effect to NPSUD (specifically Objective 1). CIAL [submission 254.19] wanted the inclusion of “social, economic, and environmental and cultural benefits” to SD-O3. The inclusion of the wording is not required to enable Council to meet the purpose of the RMA or give effect to the NPSUD, as this is achieved through the objectives and policies within the rest of the District Plan.
59. Five submitters [R & G Sparks – 183.1, J & C Broughton – 223.2, R Alloway and L Larsen – 236.2, Dalkeith Holdings Ltd – 242.2 and M Hales – 246.2] wanted the inclusion of “as a minimum” into SD-O2(4) to reflect policy 2 of the NPSUD where Tier 1 local authorities at all times, provide at least sufficient development capacity... Kainga Ora [submission 325.3] also wanted “at all times at least” to be included. The wording of the objective gives effect to policy 2 and is linked to the outcomes sought to be achieved in UFD-O1, where Council sets out the housing bottom lines required to provide “sufficient feasible development capacity for residential activity” in line with the intent of NPSUD.
60. Doncaster Developments Ltd [submission 290.3] opposed the inclusion of housing bottom lines as they are likely to limit the supply of sections. Policy 7 NPSUD requires local authorities to set housing bottom lines within their district plans. The purpose of setting the housing bottom lines is to ensure that there is sufficient development capacity to meet expected housing demand, and it is not intended to be a constraint to development.
61. Kainga Ora [submission 325.3] wanted several amendments to SD-O2 to better reflect the requirements of the NPSUD. The first point of the submission is accepted as well-functioning urban environment is not directly referenced in District Plan, despite the policies (SD-O2, SD-O3, SD-O5, SD-O6, UFD-O1 and UFD-O2) giving effect to the direction of the NPSUD. The remaining points on the inclusion of “planned urban form” and “mix of housing” is addressed through the other provisions in Strategi Direction and Urban Form and Development chapters. The striking out of SD-O2(10) is inconsistent with Section 6(e) RMA, and Objective 5, Policy 1(a)(ii) and Policy 9 of the NPSUD.
62. Rolleston Industrial Developments Ltd [submission 326.39] requested that SD-O2 be amended to include the reference to NPSUD within SD-O2(4) and amendments to SD-O2(5)(c) to provide for housing opportunities in accordance with the NPSUD. The Proposed District Plan gives effect to the NPSUD through provisions that implement the direction of the NPSUD and does not need to directly refer to the NPSUD within the objective. In addition, SD-O2(5) is about the outcome sought in relation to a hierarchy of urban centres, not the specific detail as to where housing is

proposed within each urban centre, as that is set out in the Urban Form and Development policies and also in the relevant zones.

63. Including a blanket reference to the NPSUD would also have the effect of including policies that are not relevant within a district plan (such as Policy 8 relating to residential development and intensification away from urban centres is being dependent upon private plan changes that contribute towards a well-functioning urban environment). The amendment to SD-O5(c) would undermine the other provisions within Objective SD-O2, such as SD-O2(1) consolidated and integrated with the urban environment, and SD-O2(4) which focuses new residential development within existing towns and identified development areas, which with the rest of the Proposed Plan give effect to the NPSUD.
64. The approach in SD-O2 also implements Objective 5.2.1 and Policy 5.3.1 of the RPS that requires development to be located in and around existing urban areas and promotes a coordinated pattern of development.
65. Transpower New Zealand Limited [submission 195.20] requests that “from inappropriate subdivision, use and development” be included in SD-O1(3). Objectives NFL-O1, and NFL-O2, policies NFL-P1 and NFL-P3 details the assessment used for protection of the values from use or development that would adversely affect the values of the ONL and ONF. With respect to inappropriate subdivision, council controls subdivision through SUB-R9 as a discretionary activity. For an explanation on the reasoning around the wording on SD-O1 see the Section 32 report on Strategic Directions, specifically section 3.1 which states:

For plan development, including plan changes, the strategic objectives in the Strategic Directions Chapter provide direction for the development of the more detailed provisions contained elsewhere in the District Plan in relation to strategic issues.

3.2.3 Summary of recommendations

66. I recommend for the reasons given in the assessment, that the submissions from MainPower [249.197], Kainga Ora [325.1], Clampett Investments Limited [284.32], Rolleston Industrial Developments Limited [326.34], Forest and Bird [192.28], Department of Corrections [52.3], CIAL [254.19], R & G Sparks [183.1], J & C Broughton [223.2], R Alloway and L Larsen [236.2], Dalkeith Holdings Ltd [242.2], M Hales [246.2], Doncaster Developments Ltd [290.3], Rolleston Industrial Developments Ltd [326.39] and Transpower New Zealand Limited [195.20] be **rejected**.
67. I recommend that the submissions from Kainga Ora [325.3] be **accepted in part**.
 - I recommend that SD-O2(1) be amended as set out in **Appendix A**.
68. My recommendations in relation to further submissions reflect the recommendations on the relevant primary submission.

3.2.4 S32AA further evaluation

69. Refer to Table C1: Recommended Amendments to Objective SD-O1 in **Appendix C**.

3.3 Woolworths New Zealand Limited Submissions

3.3.1 Matters raised by submitters

70. Woolworths New Zealand Limited [submitter 282] made seven submissions on the Introduction section of the Strategic Directions Chapter on a number of procedural matters, including the following:
- Centres approach for town centres,
 - Projected development capacity,
 - Self-sufficiency for business growth,
 - Enabling more supermarkets within residential zones,
 - Large format retail supporting Centre Zones,
 - Aspirational zoning provisions for growth, and
 - Strategic Directions objectives do not enable supermarkets.
71. The overall theme of the submissions is enabling the unrestricted establishment of supermarkets within the residential zones. The submitter submitted 152 submission points across a range of zones, Strategic Directions and Urban Form and Development, and some district wide matters. There were 10 further submissions in opposition to the Woolworth submission, none of which relate to strategic directions or urban form and development.

3.3.2 Assessment

72. The submission [282.89] wanted Council to adopt a “centres plus approach” but also enable business activity across other zones. It stated that there may be catchment drivers that dictate that supermarkets are located on the fringe or outside of town centres, enabling efficient use of Commercial and Mixed-use zones. Council has taken a centres approach within the Proposed District Plan. This is evident in Objective SD-O2(5) which supports a hierarchy of urban centres in the district as being the primary centres for community facilities, retail, office and other commercial activity.
73. The submitter directed Council to implement Policy 6.3.6(4) of the RPS as enabling a “centre plus approach”. The RPS policy 6.3.6(4) in fact recognises that new commercial activities should be located within key activity centres (commercial centres) and neighbourhood centres, or where located outside of the centre, should not give rise to significant adverse distribution or urban form effects. Locating a supermarket within a residential environment would potentially have an adverse effect on the anticipated residential urban form, and local infrastructure².
74. Despite the analysis above, the submitter was supportive of SD-O2.
75. The submission [282.90] noted that the projected development capacity was less than the “council projection of 16,000 new houses”. The submitter references two reports, the Waimakariri 2048 District Development Strategy that has a projected housing demand of 15,000

² Rangiora Countdown covers 1.63ha and includes 83% impervious surfaces.

by 2048, and the Business Development Capacity Assessment by the Greater Christchurch Partnership (2018) has the projection of 16,000 new houses. Objective UFD-O1 based on the projected 13,400 households and includes extra land required under NPSUD to ensure sufficient competition.

76. It should be noted that the Greater Christchurch Partnership did an updated Housing and Business Development Capacity Assessment in 2021. Updated housing demand figures that exclude Oxford, have been incorporated into the Proposed District Plan as part of a submissions [183.2, 242.3, and 246.4]. I understand the District Council are looking at updating the housing bottom line figures this year which will take into account anticipated growth outside of the future development areas identified in Map A of the RPS (**Appendix E**).
77. The submissions [282.100, 282.91, 282.95] states that Council has failed to meet the NPSUD with respect to housing or business growth by ensuring enough business land is available to achieve self-sufficiency for business growth. The analysis of business land availability by Formative (2021)³ concluded that the policies in the Proposed District Plan would provide sufficient land to meet the business needs.
78. The submission [282.95] requests that provision is made enabling supermarkets within residential zones. The rules for medium density residential zone do not envisage that supermarkets are established within the zone. Supermarkets have the potential to generate adverse effects associated with traffic, noise, light, stormwater, economic and social impacts⁴. While they can be considered as convenient for local residents, they will require consideration around street design, upgrading of electricity supply network, and provision for multi modal transportation systems.
79. The District Councils Local Alcohol Policy (2018)⁵ restricts off-licence alcohol sales to Business 1 or 2 zoned land (Commercial and Mixed-Use Zones). Any supermarket within the residential zones would breach the council policy (section 4.2.3) if sold alcohol. The wording is as follows:
- No off-licence is to be issued for any business being a new 'stand-alone'⁶ bottle store, unless that bottle store is located on land zoned Business 1 Zone or Business 2 Zone as defined in the Waimakariri District Plan. Where a stand-alone bottle store was lawfully established prior to the adoption of this LAP, its use is exempt from clause 4.2.2 until such time as the Council amends this part of the Policy.*
80. In response to submission 282.97, large format retail impacts on town centres are dependent upon the size of the town centre. Small towns are more likely to be adversely affected by large format retail, compared to bigger centres where there is sufficient population to minimise the impacts. The PLANZ (2019)⁷ report identified that supermarkets are key generators of people

³ https://www.waimakariri.govt.nz/_data/assets/pdf_file/0027/98406/28.-Formative-WDC-business-land-assessment-update-district-plan-review-0921.PDF

⁴ Taylor N et al, 2003. Social impacts of out-of-centre shopping centres on town centres: a New Zealand case study. Impact Assessment and Project Appraisal. Vol. 21, No. 2, pp. 147-153.

⁵ https://www.waimakariri.govt.nz/_data/assets/pdf_file/0027/28386/Local-Alcohol-Policy-20181217.pdf

⁶ "“Off-Licence” has the meaning given by Section 17 and 18 of the Sale and Supply of Alcohol Act 2012”

⁷ PLANZ, 2019. Proposed replacement District Plan Commercial and Industrial Framework. Prepared for Waimakariri District Council.

activity, helping to attract high numbers of shoppers to centres. Large format retailers, supermarkets aside however have the potential compete with a large number of individual retailers, having a negative effect on the diversity and functional amenity of established town centres²⁸ and are generally inward facing rather than interacting with the surrounding commercial businesses⁹.

81. A submission [282.100] wanted aspirational zoning provisions for growth to respond and adapt to developing market drivers. Council has provided for supermarkets to develop in two areas as part of the Proposed District Plan. The two new large format retail zones, at Kaiapoi and Rangiora provide for supermarkets as discretionary activities. As discussed previously, Council has provided sufficient business land to meet the anticipated growth for the district.
82. The submissions [282.95, 282.117] was that Strategic Directions does not enable supermarkets. Strategic Directions chapter provides the overarching direction for the district plan and its implementation and interpretation. It covers the topics considered significant in the district and important to achieving the overall vision for use and development within the district. Enabling unrestricted supermarket development is not considered a significant issue for the district. Provision has been made to meet the business land requirement associated with population growth out to 2048.

3.3.3 Summary of recommendations

83. **I recommend** for the reasons given in the assessment that all the submissions on Strategic Directions by Woolworths New Zealand Limited are **rejected**.

3.4 Indigenous Biodiversity Submissions

3.4.1 Matters raised by submitters

84. Three submitters raised the issue around the term “overall net gain” for indigenous biodiversity-related matters, including the following:
 - Enabling further loss of indigenous biodiversity,
 - Incorporation of the NPSFM,
 - How is this measured at district level,
 - Consistency with the exposure draft of the NPS Indigenous biodiversity, and
 - Duplication of functions with ECan.
85. Overall net gain in the quality and quantity of indigenous ecosystems and habitat, and indigenous biodiversity, is introduced in Objective SD-O1(1). The concept of “overall net gain” vs “net gain” is discussed below. An assessment of other submission points that relate to SD-O1

⁸ McGreevt, M. 2016. The economic and employment impacts of shopping mall developments on regional and peri-urban Australian towns. Australian Journal of Regional Studies, Vol. 22, No. 3, pp. 402-434.

⁹ Goodman R and Kroen A, 2019. Assessment of retail model in greenfield development settings: The social and health impacts of the form of shopping centres in new suburbs. Prepared for Department of Environment, Land, Water and Planning, Victoria Australia

and the incorporation of ecological provisions within other objectives in Strategic Directions is discussed later in this report.

86. Forest and Bird [submission 192.29] requested that the words “an overall” be removed from the SD-O1(1) and Hort NZ [submission 295.69] wanted clarification on how it would be measured and monitored. A further submission opposing Forest and Birds submission was received from Federated Farmers.
87. Forest and Bird [submission 192.29] wanted amendments to the SD-O1 where the inclusion of significant indigenous vegetation and habitats are protected to be consistent with the RPS, and the Council safeguards the mauri of ecosystems and indigenous biodiversity and freshwater is managed to give effect to Te Mana o te Wai to be consistent with the NPSFM and NZCPS.
88. Federated Farmers [submission 414.51] supported the concept of ‘overall net gain’ and requested amendments to relevant policies, rules, methods and appendices/schedules that reflect the implementation of the objective.

3.4.2 Assessment

89. Forest and Bird [submission 192.29] have implied that “overall net gain” has a greater degree of impact than “net gain”, and that the proposed plan is inconsistent with Objective 9.2.1 of the RPS and the draft NPSIB. Federated Farmers agreed with the approach of “overall net gain” and wanted additional policy and rules in other parts of the Proposed Plan to reflect the approach.
90. The exposure draft for the NPSIB has the following principle for net gain with respect to biodiversity offsetting¹⁰, noting that offsetting is the fourth option within an effects management hierarchy of five options¹¹:

Net gain: The biodiversity values to be lost through the activity to which the offset applies are counterbalanced and exceeded by the proposed offsetting activity, so that the result is a net gain when compared to that lost. Net gain is demonstrated by a like-for-like quantitative loss/gain calculation of the following, and is achieved when the ecological values at the offset site exceed those being lost at the impact site across indigenous biodiversity:

- (a) types of indigenous biodiversity, including when indigenous species depend on introduced species for their persistence; and*
- (b) amount; and*
- (c) condition.*

91. Neither the exposure draft NPSIB (2022) or the draft NPSIB (2019) use the term “overall net gain” within the documents but use the term “net gain” for biodiversity offsetting.
92. The RPS refers to an “overall gain” in the state of indigenous biodiversity with regards to biodiversity offset, but this is on the back of there being no net loss as set out in Objective 9.2.1 of the RPS:

¹⁰ Appendix 3: Principles for biodiversity offsetting, Principle 3

¹¹ Section 1.5(4) Fundamental concepts

*There also needs to be certainty that the proposed offsets will occur. Some offset measures such as indigenous planting will take a long time to establish and become useful in a biodiversity role. The overall goal is that there should be no net loss, and preferably an **overall gain** in the state of indigenous biodiversity as a result of the project and its biodiversity offsets.*

93. The national guidance on biodiversity offsetting¹² does use the term “overall net gain” in some explanatory text on achieving a net gain through “trading up”. However, the biodiversity offset design uses the goal of “no net loss and preferably a net gain in biodiversity”. This view was further reinforced in the biodiversity offsetting guidance document¹³.
94. The PNPSIB is an exposure draft document that had previously been a consultation process (2019-2020). On the Ministry for the Environment website and within the NPSIB Draft Implementation Plan (2022), the MfE have stated that the purpose of the draft was “*to outline expectations for implementation and provide a starting point for further discussions and work with iwi/Māori and stakeholders through the NPSIB exposure draft period and beyond*”. On this basis it can be reasonably assumed that the “net gain” wording for biodiversity offsetting aligns with and gives effect to the relevant higher order documents and should be also used in the Proposed District Plan. Section 1.5(3) Fundamental Concepts of the draft NPSIB states that “*maintenance of indigenous biodiversity requires at least no reduction...*” then lists a series of criteria including the size and distribution of indigenous species. Given that the PNPSIB is the second draft produced by MfE and been worked through with numerous stakeholders, I consider that it can be afforded a higher weighting in this assessment for the Proposed Plan.
95. Hort NZ [submission 295.69] wanted clarification around “overall net gain”, this is addressed above.
96. Forest and Bird [submission 192.29] wanted additional text added to SD-O1(1) and the creation of a new point on freshwater management. The additional test of “across the district and significant indigenous vegetation and habitats are protected” forms part of Objective ECO-O1 and for integration purposes the amended wording is accepted (apart from the words ‘*across the district*’ as this is a repeat of the objective introduction). The amendment to wording in SD-O1(2) of ‘including’ to link freshwater bodies and wetlands is counter to the use of wetlands in Chapter 7 of the RPS, which separates out wetland from other freshwater bodies (rivers and lakes). The intent of the wording was by separating out wetlands would mean that management of both coastal and freshwater wetlands would be integrated in any assessment under the objective which is reflected in the analysis in section 3.3.1 of the Strategic Directions Section 32.
97. Forest and Bird [submission 192.29] also sought the inclusion of a new provision wanting the mauri of ecosystems and indigenous biodiversity safeguarded and freshwater managed to give effect to Te Mana o te Wai. Section 3.2 of the NPSFM requires Regional Councils to give effect to Te Mana o te Wai and engage with the community and tāngata whenua on how it will be

¹² Ministry for the Environment, 2014. Guidance on Good Practice Biodiversity Offsetting in New Zealand. New Zealand Government.

¹³ Biodiversity Working Group, 2018. Biodiversity Offsetting under the Resource Management Act _ A guidance document.

applied to water bodies and freshwater ecosystems in the region. ECan is yet to undertake such work to amend the RPS and the Regional Land and Water Plan to give effect to the NPSFM.

98. The Proposed Plan gives effect to the NPSFM through a range of policies. ECO-P8 recognises Te Mana o te Wai and maintains the ecological integrity of waterbodies by avoiding indigenous vegetation clearance near them. SD-O1(5) and SASM-P1 and SASM-P5 recognise the integrated nature between land and water bodies. Policies NATC-P4, ASW-P1 and CE-O1 and CE-P2 seek to preserve the natural character of water bodies, which includes such aspects as water quantity, quality and indigenous biodiversity, habitat and ecosystems. The policies within the Proposed Plan are consistent with the RPS, while recognising the NPSFM. Accordingly, I do not recommend any change to Objective SD-O1 with regard to this part of the submission.
99. Forest and Bird submission 192.30 recommends that additional wording be added to SD-O2 *Urban Development* of "incorporates and sustains indigenous biodiversity". This concept is covered in Objectives SD-O1(4) and ECO-O1, and Policy ECO-P4 and does not need to be repeated in other strategic direction objectives.
100. DoC in submission 419.32 wants additional clauses in Objective SD-O3 to avoid loss of extent of natural inland wetlands and rivers. The suggested change is in line with the direction of the NPSFM. However, the suggested changes are a function of Regional Councils as per sections 3.23 and 3.24 of the NPSFM. Objective EI-O2, and Policies EI-P5, NATC-P5 and NATC-P6 address the issue of infrastructure impacts upon natural inland wetlands and rivers.

3.4.3 Summary of recommendations

101. I recommend that the submission to amend the term 'overall net gain' to 'net gain' from Royal Forest and Bird Protection Society of New Zealand Inc [192.29] is **accepted**.
102. I recommend that the submissions from Forest and Bird [192.28, 192.30], Federated Farmers [414.51] and DoC [419.32] be **rejected**.
103. I **recommend** that the submissions from Forest and Bird [192.29] and Hort NZ [submission 295.69] be **accepted in part**.
104. My recommendations in relation to further submissions reflect the recommendations on the relevant primary submission.
105. I **recommend** that SD-O1(1) be amended as set out in **Appendix A**.

3.4.4 S32AA further evaluation

106. Refer to Table C1: Recommended Amendments to Objective – SD-O1 in **Appendix C**.

3.5 Removing of Zoning Constraints for Housing - Submissions

3.5.1 Matters raised by submitters

107. Seven submissions raised issues around removing zoning constraints on housing development across the district-related matters, including the following:
- Increasing the areas where residential properties can be built, and
 - Having a range of property sizes.

108. Four of the submissions relate to the request for rezoning of San Dona from Rural Lifestyle Zone to Large Lot Residential Zone.

3.5.2 Assessment

109. Four submissions [CA & GJ McKeever – 111.3, John Stevenson – 162.2, Chloe Chai and Mark McKitterick – 256.3 and Keith Godwin – 418.3] all request the same amendments to SD-O2(9) removing the constraint of allowing large lot residential development outside of identified areas. The District Council went through a consultation process in 2018 through the Rural Residential Development Strategy that identified potential large lot residential growth areas in the district taking into account a number of constraints. Policy 5.3.1 of the RPS requires the limiting of rural residential development and promotes a coordinated pattern of development. Policy 6.3.9 of the RPS requires rural residential development to be in accordance with the rural residential development strategy as that document was prepared using a special consultative procedure under the Local Government Act 2002. The proposed changes are inconsistent with the RPS.
110. The submissions by Ken Fletcher [99.2], Rolleston Industrial Developments Ltd [326.39] and Ngāi Tahu Property [411.3] wanted amendments to SD-O2 for the District Council to provide for affordable housing options in all zones across the district and to provide for housing opportunities around existing towns. The District Council has undertaken an assessment of housing demand and has provided sufficient land to meet the housing bottom lines detailed in the Strategic Direction Section 32 report. Council can only influence housing affordability through enabling sufficient zoned land for development where there is appropriate infrastructure and no constraints.

3.5.3 Summary of recommendations

111. **I recommend** that the submissions from CA & GJ McKeever [111.3], John Stevenson [162.2], Chloe Chai and Mark McKitterick [256.3], Keith Godwin [418.3], Rolleston Industrial Developments Limited [326.39], Ken Fletcher [99.2], and Ngāi Tahu Property [411.3] be **rejected**.

3.6 Consideration of Versatile Soils and the National Policy Statement on Highly Productive Land - Submissions

3.6.1 Matters raised by submitters

112. Four submissions raised issues around the protection of versatile soils, which links to the NPSHPL-related matters, including the following:
- Supply of physical construction materials,
 - Provision of primary production in rural environment,
 - Urban development avoiding versatile soils, and
 - Protection of highly productive land and versatile soils.
113. The NPSHPL was released in September 2022 (coming into force on 17 October 2022), approximately one year after the close of submissions on the Proposed Plan. The application of

the NPSHPL will be assessed within the relevant zone chapters and where applicable the subdivision chapter.

3.6.2 Assessment

114. Fulton Hogan has submitted [41.14] to amend SD-O3 to acknowledge the need for a ready local supply of physical construction materials for infrastructure. The submission is inconsistent with Policy 8 of NPSHPL which in section 3.9(2)(j)(iv) details that aggregate extraction is only allowed on highly productive land where it "...provides a significant national or regional public benefit that could not be achieved using resources within New Zealand". Strategic objective SD-04(1) seeks to manage rural land for rural production activities, activities that directly support rural production and activities reliant on the natural resources of Rural Zones, with the third part of this objective recognising that there are other natural resources (such as aggregates). This objective is complemented by objective RURZ-O2 and policy RURZ-P2 to provide for activities with a functional need to be located in the Rural Zones (which would include quarrying activities). Aggregate production in the district is not a strategic matter. There was one further submission in support of the Fulton Hogan submission from Federated Farmers [FS83].
115. Hort NZ [295.7] and Federated Farmers [414.53] submissions want amendments to Strategic Directions objectives to protect Land Use Classification (LUC) 1 to 3 soils from subdivision, development and incompatible activities within the rural zone. Hort NZ submission on SD-O2 is not applicable as urban development is intended to only occur on land that has been zoned for development and is thereby excluded from the NPSHPL under the exclusions allowed in policies 5, 6 and 7. There were three further submissions in opposition and one in support of the Hort NZ submission.
116. The Federated Farmers submission [414.53] wants an amendment to SD-O4 to protect LUC 1 to 3 soils from subdivision and development to maintain the life-supporting capacity of the soil. The Proposed District Plan has not addressed the issue of the protection of highly productive land. Including the amended wording within SD-O4 would negate the application of the policy as half of the rural land within the district is zoned Rural Lifestyle and the provisions of NPSHPL do not apply. There were two further submissions in opposition and one in support of the Federated Farmers submission.
117. The assessment of the NPSHPL and its application will be undertaken as part of the Section 42A report for the Rural Zones.
118. ECan [316.3] wanted an amendment to SD-O4 to better reflect the provisions of the RPS and the NPSHPL. The RPS contains the following policies that requires adverse effect on soil be considered in the proposed plan; Objective 15.2.1 requires the maintenance of soil quality, Policy 15.3.1 requires land-use and land management practices to avoid significant long-term adverse effects on soil quality, Policy 5.3.2 adverse effects on the productivity of soil resources and Policy 5.3.12 which avoids development and/or fragmentation that forecloses the ability of land for rural production. The application of RPS and the introduction of the NPSHPL will be addressed in the General Objectives and Policies for all Rural Zones and General Rural Zone chapters. Any consequential changes to the objectives in the Strategic Directions chapter can be considered in that report.

3.6.3 Summary of recommendations

119. I recommend the Rural Zones chapter reporting officer consider the submissions from Fulton Hogan [41.14], Hort NZ [295.7], Federated Farmers [414.53], and ECan [316.3].
120. It should be noted that for the reasons given in the assessment, the application of the provisions of the NPSHPL be included in the General Rural Zone, as they are not applicable across all of the rural zones within the district.

3.7 Reverse Sensitivity Submissions

3.7.1 Matters raised by submitters

121. Three submissions raised issues around reverse sensitivity related matters, including the following:
 - Reverse sensitivity on business activities, and
 - Managing adverse effects on infrastructure.

3.7.2 Assessment

122. Fulton Hogan submission [41.13] wanted a provision on reverse sensitivity added to SD-O2(6). Reverse sensitivity is covered under UFD-P10, INZ-P5 and CMUZ-P8. It is more appropriate to cover the impacts of reverse sensitivity within the appropriate zone chapter rather than within the Strategic Directions chapter.
123. Forest and Bird have submitted [192.31] to move the provision of SD-O3(2)(b)(ii) and form a point under SD-O3(2)(a). The proposed amendment was considered to give better effect to achieving the objective of the RMA. They noted that the existing wording was less directive than avoiding adverse effects as required under the NZCPS and for the protection of SNAs. Policy EI-P5(3), CE-P7 and ECO-P7 is more directive as it requires that new energy and infrastructure should where practicably be located outside of sensitive areas to protect such environments from significant adverse effects.
124. Forest and Bird in their submission also noted that it was uncertain that the term “surrounding environment” was adequate to consider all adverse environmental effects under S5 of the RMA. The term “surrounding environment” has not been defined, but in relation to adverse environmental effects can be considered that area where those effects are experienced. Schedule 4(7) RMA details matters to be assessed by an assessment of environmental effects, which is not constrained by distance but relates to where effects will be experienced. Any consequential changes to the objectives in the Strategic Directions chapter can be considered in the relevant zone Section 42A reports.
125. MainPower [submission 249.200] requested additions to SD-O3 to manage reverse sensitivity on “important” infrastructure and avoiding adverse effects on the distribution network”. The submitter wanted a new term “important” infrastructure and opposed the use of critical, strategic and regionally significant, this is discussed in section 3.8.2 below. The issue of avoiding adverse effects on electricity distribution network are covered under SD-O3(2)(b)(ii) and policy EI-P6 and do not need to be repeated for a second time in the objective. The definition of infrastructure in the RMA (including Section 166) includes electricity operator or distributor.

3.7.3 Summary of recommendations

126. I **recommend** for the reasons given in the assessment, that the submissions from Fulton Hogan [41.13], Forest and Bird [192.31], and MainPower [249.200] be **rejected**.

3.8 Infrastructure Submissions

3.8.1 Matters raised by submitters

127. Seven submissions raised infrastructure-related matters, including the following:
- Ensuring development is adequately serviced by infrastructure,
 - Recognising and the protection of infrastructure, and
 - Christchurch International Airport operations.
128. It should be noted that CIAL have submitted across most of the Proposed Plan wanting the same provision or consideration across multiple chapters. For efficiency purposes the core issues associated with the efficient operation, use, development, appropriate upgrading and safety of the airport are covered in the most relevant chapter.

3.8.2 Assessment

129. Chorus, Spark and Vodafone submitted [62.2] wanting an extra provision in SD-O2 ensuring that all new developments are adequately serviced by telecommunication, broadband and electricity. The provision of new infrastructure, that includes telecommunication, has been provided for in Objective EI-O1, and policies EI-P1(5) and SUB-P8. This is not a matter that needs to be addressed within strategic directions.
130. CIAL want to amend SD-O2 [254.18], SD-O3 [254.19] and SD-O4 [254.20] to ensure that any urban development did not affect the airport operations. All three submission points want wording added to recognise and provide for the safe, efficient operation, use, development, appropriate upgrading of strategic, critical and regionally significant infrastructure, protecting it from other land use and development. Submission 254.18 supports the consolidation of urban development and infrastructure, but does not want them to impact strategic, critical and regionally significant infrastructure. The submissions wanted a new point added to SD-O2 immediately after SD-O2(1), proposes re-writing of Objective SD-O3(2) and a new point added to SD-O4.
131. Submission 254.19 includes a proposal to amend Objective SD-O3 to include references to the Christchurch International Airport 50 dBA Ldn Noise Contour, with reference to housing density in Kaiapoi, and the management of bird strike. The application of the noise contours will be addressed within the Noise Section 42A, Variation 1 Section 42A and Rural Section 42A reports. The issue of bird strike will be addressed in the Rural Zones Section 42A report(s). It is intended that these issues all get addressed in the Section 42A report that are the most relevant. Any consequential changes to the objectives in the Strategic Directions chapter can be considered in those report(s).

132. MainPower submission [249.200] requests amendment to SD-O3(2) so that it places an onus on infrastructure providers to provide infrastructure to those parts of the community, including those parts where it is technically unfeasible or economic to provide infrastructure. I am not sure that was the outcome intended by MainPower. MainPower also sought that where SD-O3(3) uses strategic, critical and regionally significant infrastructure, this be replaced by "important infrastructure". I do not recommend this change as the terms are specific infrastructure terms used in the Canterbury RPS. The provision of energy and infrastructure and management of the effects of energy and infrastructure are addressed through the objectives and policies in the Energy and Infrastructure chapter and the response to submissions in that s42A report. Any consequential changes to the objectives in the Strategic Directions chapter can be considered in that report.
133. The Waka Kotahi submission [275.4] wanted a new provision within SD-O2 that recognises the importance of the land transport network in urban development. The integration of urban development and infrastructure (including transport) is in SD-O2(1). Objective RESZ-O2 links residential land development and design and infrastructure, that includes roads (section 166(f) RMA) and Policy TRAN-P1(1) by recognising the benefits of transport. The repeating of the link between transport and urban development is not required as it is already present within the Proposed Plan.

3.8.3 Summary of recommendations

134. **I recommend** for the reasons given in the assessment, that the submissions from Chorus, Spark, and Vodafone [62.2], and Waka Kotahi [275.4] be **rejected**.
135. **I recommend** that the submissions from CIAL (254.18, 254.19 and 254.20) are addressed by the authors of the s42A reports with respect to Noise and Rural chapters and Variation 1.
136. **I recommend** that the submission from MainPower (249.200) addressed by the author of the Energy and Infrastructure s42A report.

3.9 Natural Hazards Submissions

3.9.1 Matters raised by submitters

137. Four submitters raised natural hazard issues and related matters, including the following:
- Managing subdivision, use and development,
 - Avoiding or minimising subdivision,
 - Location of infrastructure, and
 - Removing constraint on use of land.
138. All submissions that relate to natural hazards apply to SD-O6.
139. Four submissions points wanted amendments to SD-O6 and eight submission points were in support of retaining the objective as written.

3.9.2 Assessment

140. Two submitters have requested either a change in wording or a softening of wording in SD-O6(1). The submissions want “avoid” replaced with “manage” [Concept Services – 230.1] or the addition of “minimise” [Kainga Ora – 325.6]. Both submitters have stated they felt that under certain circumstances subdivision, use or development could occur where the risk is unacceptable. Section 62(1)(i) of the RMA requires the RPS to state that local authorities who are responsible to ‘avoid or mitigate natural hazards or any group of hazards’. Objective 6.2.1(8) of the RPS enables development within Greater Christchurch that protects people from unacceptable risk from natural hazards and the effects of sea-level rise. The objective and policy framework has an “avoid” directive (such as Policy 11.3.1 and Policy 11.3.5 of the RPS) which requires that inappropriate development avoids high hazard areas. The methods relevant to the policies mirror that territorial authorities will include objectives and policies that avoid new subdivision, use and development.
141. One submitter [Concept Services – 230.1] noted that there was no definition of what constitutes an unacceptable risk. Policy 11.3.5 of the RPS defines what an unacceptable risk is in relation to natural hazards. While the Proposed Plan does not have a definition for unacceptable risk in relation to natural hazards, as against hazardous facilities, Council would use the ECan policy when considering unacceptable risk.
142. The MainPower submission [254.202] wanted an additional clause added to the SD-O6 relating to the placement of important infrastructure in areas of significant natural hazard risk where there is no reasonable alternative. The issue of strategic, critical and regionally significant infrastructure being located within high flood and coastal flood areas is addressed in objective NH-O2. Policies NH-P10 to NH-P14 cover a combination of existing and new infrastructure across various natural hazard situations.
143. Federated Farmers in their submission [414.3] wanted the term “use” removed from Objective SD-O6, as they felt the term was vague and could be applied to rural land use. The assumption that only rural land use is only going to occur in areas of high natural hazard is erroneous. It is feasible that other land use activities could occur on the site that place people or property at risk without the need for a subdivision or development.

3.9.3 Summary of recommendations

144. I recommend for the reasons that the submissions from Concept Services [230.1], Kainga Ora [325.6], MainPower [254.202], and Federated Farmers [414.55 and 414.3] be **rejected**.

3.10 Rural Activities Submissions

3.10.1 Matters raised by submitters

145. Seven submitters raised the following issues in relation to rural land in Strategic Directions:
- Terminology,
 - Provision of schools,
 - Retention of rural land and versatile soils for primary production,
 - Other land use in Rural Zones, and

- Support and service centres for primary production.

146. The issues raised under rural activities mostly cover SD-O4. Overall, there were 23 submission points on SD-O4, three opposed, 12 wanting amendments, three as neutral and five in support. One submitter wanted the objective deleted altogether in relation to the 20ha rural subdivision constraint [Eyrewell Dairy Ltd - 300.2], one wanted a complete re-write [NZ Pork – 169.11] and one just amendment [Fulton Hogan – 41.15]. The three neutral were from San Dona submitters [111.5, 256.5, 418.5]. Those in support were Te Ngāi Tūāhuriri Rūnanga [142.3], MainPower [249.201], Clampett Investments Ltd [284.35], Nick and Cilla Taylor [298.2], and Dairy Holdings Ltd [420.2].

3.10.2 Assessment

147. The Fulton Hogan submission [41.15] on SD-O4 requested amendments to replace rural production with primary production. The term rural production is only used in the Proposed Plan in Natural Features and Landscapes and the Light chapters to differentiate quarrying and mining activities from other rural based land use activities. Rural production is not used in any of the rural zone chapters. Given the intent of the strategic direction was to provide the high-level direction to the rural zones, the proposed amendments by Fulton Hogan make sense and are accepted in full. The proposed amendment will better align with the Section 32 on the Rural Zones.

148. Ministry of Education submissions [277.1 and 277.11] requested that schools be provided for as an amendment to SD-O2 and the amendment to SD-O4(1) through removing the word “directly”. The approach in the Section 32 report was to control inappropriate unconstrained development within the rural area in accordance with Objective 5.2.1(e) and (i), Policy 5.3.2(c) and Policy 5.3.12 of the RPS. It is intended to avoid the foreclosure of land for primary production and reverse sensitivity. The words “...and limit other activities;” provides the scope for activities such as schools and this is reflected in the objectives and policies of the Rural Zones.

149. Ngāi Tahu Property submission [411.3] wanted the word “primarily” included at the beginning of SD-O4(1). They felt there may be instances when rural land would need to be used for other activities. The paragraph above explains the approach within the Section 32 report.

150. NZ Pork submission [169.11] wanted a replacement of all wording in SD-O4 with wording on protection of productive land and versatile soils for primary production. The present wording uses rural production, which by definition excludes intensive outdoor and indoor primary production and aggregate extraction, neither of which are reliant on the productive capacity of highly productive land. The submission noted the inconsistencies in policies between SD-O4 Rural Land referring to rural production and RURZ-P2 Rural Land referring to primary production. The Section 32 report details which objectives of the RPS that SD-O4 responds to. The RPS uses the term “primary production” that is defined as including agricultural, horticultural, pastoral, aquaculture and forestry products, without excluding indoor and outdoor intensive production, but does not include quarrying or aggregate extraction. This is in line with RPS Policy 5.3.2(c) and 5.3.12, which seeks to limit the comprise or foreclosure the ability to use the soils resources and land for primary production.

151. Fulton Hogan has also requested [submission 41.9] that the definition for “rural production” is deleted and replace all references within the Proposed Plan with “primary production”. There are four submissions wanting the rural production definition deleted or amended [Fulton Hogan

– 41.9, Aggregate and Quarry Association – 127.2, NZ Pork – 169.8, and Federated Farmers – 414.18] and two wanting it retained [Hort NZ – 295.54, Daiken NZ – 145.6]. The definition is used within the Natural Landscapes and Features chapter that provides for some rural activities that don't have significant impacts upon the values associated with those landscapes, which is discussed in the Section 32 for Natural Features and Landscapes.

152. The submission is supported by Hort NZ [FS47] and is similar to Fulton Hogan [submission 41.15] who wanted rural production replaced with primary production. An explanation around the term primary production will be provided in the Section 42A report on the Rural zones.
153. Federated Farmers [414.52 and 414.53] wanted amendments to SD-O2(5) and SD-O4. The amendments to SD-O2(5) were to add an extra provision to enable support and service centres for primary production to be located within the urban environment. This is provided in Objective SD-O2(6) and through the policies within the residential, commercial, and industrial zone chapters that enable businesses and commercial activities to establish in those areas. The amendments to SD-O4 were having "limit other activities" as a separate line and removing it from SD-O4(1). The proposed amendment does not make the objective clearer and by itself provides no context as to what is to be limited.

3.10.3 Summary of recommendations

154. I recommend for the reasons given in the assessment, that the submissions from Fulton Hogan [41.15] be **accepted**.
155. I recommend for the reasons given in the assessment, that the submissions from Ministry of Education [277.1 and 277.11], Ngāi Tahu Property [411.3], and Federated Farmers [414.52 and 414.53] be **rejected**.
156. I recommend for the reasons given in the assessment, that the submissions from NZ Pork [169.11] be **accepted in part**.
157. I recommend that SD-O4 be amended as set out in **Appendix A**.

3.10.4 S32AA further evaluation

158. Refer to Table C3: Recommended Amendments to Objective – SD-O4 in **Appendix C**.

3.11 Variation 1 Submissions

3.11.1 Matters raised by submitters

159. One submitter raised rezoning of specific Rural Lifestyle Zone area to Medium Density Residential Zone [Mike Greer Homes 13.1].
160. One other submission [Heritage New Zealand submission 12.2] was received that supported the proposed plan change under Variation 1 Medium Density Residential Standards (MDRS). This submission will be assessed in the Section 42A Variation 1 report.

3.11.2 Assessment

161. Mike Greer Homes Ltd [submission 13.1] requested that the area south of Kaiapoi down to the tributary of the Kaiapoi River and between the Main Trunk Railway Line and Main North Road,

be rezoned from Rural Lifestyle Zone to Medium Density Residential Zone. The assessment of the submission will be undertaken as part of the Rezoning hearing reports.

3.11.3 Summary of recommendations

162. I recommend that the submission from Mike Greer Homes Ltd [13.1] be considered by the author of the rezoning S42A report.

3.12 Definitions

3.12.1 Matters raised by submitters

163. Eight submissions raised two-related matters, including the following:

- Strategic infrastructure, and
- Urban Environment.

3.12.2 Assessment

164. The definition for Strategic Infrastructure was supported by CIAL [submission 254.15], New Zealand Defence Force [submission 166.5], KiwiRail Holdings Limited [submission 373.10] and Transpower New Zealand Limited [submission 195.14] and that the wording be retained. There is one submission [DoC, submission 419.27] that the definition be amended to exclude Port of Lyttelton, because it is not in the district. The Port of Lyttelton is listed as a strategic infrastructure asset in the RPS, as are defence facilities which are also not in the district. The District Plan is required to be consistent with ECan RMA documents. It is recommended that the definition for Strategic Infrastructure be retained. The submissions to retain the definition are **accepted** and the submission to amend the definition is **rejected**.
165. There were three submissions on Urban Environment, two wanting amendments and one in support of the definition. Of the two amendments, one wanted the inclusion of Large Lot Residential Zone Overlay to be included in the definition [A Carr, submission 185.5] and one wanted Pegasus to be relocated to be within Woodend [Ravenswood Developments Limited, submission 347.4]. The submission in support wanted the definition to be retained [Rolleston Industrial Developments Limited, submission 326.33].
166. The submission by A Carr to include Large Lot Residential Zone Overlay as part of the Urban Environment. The land parcel (308 Cones Road) in the PDP is proposed to be zoned Rural Lifestyle Zone and could be rezoned to Large Lot Residential Zone once an outline development plan has been developed in accordance with SUB-P6. SUB-P6 requires that those land parcels proposed to be rezoned as Large Lot Residential Zone be integrated together so they produce an efficient urban design, rather than in isolation. The overlay is not the proposed zoning for the site and the site will remain as Rural Lifestyle Zone until the conditions of SUB-P6 have been met. I recommend that the submission is not accepted.
167. The definition for Urban Environment is from the NPSUD. In addition, it also lists those areas within the district where the urban flood maps apply. The application of the Urban Environment definition will need to be amended to ensure that conflicts in meaning do not occur when used within the Urban Form and Development chapter. This is covered in the Section 42A report for Urban Form and Development.

168. The submission by Ravenswood Developments Limited was that Pegasus be included in addition Ravenswood within Woodend. Pegasus was gazetted in 2004 by the New Zealand Geographic Board as a town located between Woodend and Waikuku Beach. Objections to the place name were accessed and a decision made by the Minister of Land Information. The gazettal is for a separate town called Pegasus and is not recorded as being part of Woodend. I recommend that the submission is not accepted.

3.12.3 Summary of recommendations

169. That the definition for Strategic Infrastructure remain unchanged and that the submissions from CIAL [254.15], New Zealand Defence Force [166.5], KiwiRail Holdings Limited [373.10] and Transpower New Zealand Limited [195.14] in support of retaining the wording is **accepted**.
170. That the definition for Strategic Infrastructure remain unchanged and that the submission from DoC [419.27] to amend the definition of for Strategic Infrastructure be **rejected**.
171. That the definitions for Urban Environment remain unchanged and that the submission from Rolleston Industrial Developments Limited [326.33] in support of retaining the wording is **accepted**.
172. That the definition for Urban Environment remain unchanged and that the submissions from A Carr [185.5] and Ravenswood Developments Limited [347.4] to amend the definition of Urban Environment are **rejected**.

3.13 Minor Errors

173. There are no minor amendments recommended to the Strategic Directions chapter.

4 Conclusions

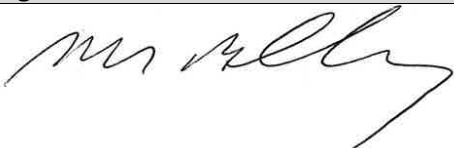
174. Submissions have been received in support of or neutral (50), and in opposition (5) and requesting amendments (66) to the Proposed Plan. While most of these submissions relate to the Strategic Directions as notified, some submissions have wider ramifications across other chapters of the Proposed Plan.
175. Having considered all the submissions and reviewed all relevant statutory and non-statutory documents, I recommend that Proposed Plan should be amended as set out in **Appendix A** of this report.
176. For the reasons set out in the Section 32AA evaluation attached at **Appendix C**, I consider that the proposed objectives and provisions, with the recommended amendments, will be the most appropriate means to:
- achieve the purpose of the Resource Management Act 1991 (RMA) where it is necessary to revert to Part 2 and otherwise give effect to higher order planning documents, in respect to the proposed objectives, and
 - achieve the relevant objectives of the Proposed Plan, in respect to the proposed provisions.

Recommendations:

I recommend that:

1. The Hearing Commissioners accept, accept in part, or reject submissions (and associated further submissions) as outlined in **Appendix B** of this report; and
2. The Proposed Plan is amended in accordance with the changes recommended in **Appendix A** of this report.

Signed:

Name and Title		Signature
Report Author	Mark Buckley Principal Policy Planner	

Appendix A. Recommended Amendments to Strategic Directions

Where I recommend changes in response to submissions, these are shown as follows:

- Text recommended to be added to the Proposed Plan is underlined.
- Text recommended to be deleted from the Proposed Plan is ~~struck through~~.

Other notes

- There are a number of submissions that relate to matters that can be considered not significant enough to be strategic directions.
- The amendment to SD-O2(1) changing Urban environments to urban centres is detained in Section 3.9 of the S42A Urban Form and Development report.

SD-01 Natural Environment

Across the District:

1. there is an ~~overall~~ net gain in the quality and quantity of indigenous ecosystems and habitat, and indigenous biodiversity and significant indigenous vegetation and habitats are protected;
2. the natural character of the coastal environment, freshwater bodies and wetlands is preserved or enhanced, or restored where degradation has occurred;
3. outstanding natural features and outstanding natural landscapes are identified and their values recognised and protected;
4. people have access to a network of natural areas for open space and recreation, conservation and education, including within riparian areas, the coastal environment, the western ranges, and within urban environments; and
5. land and water resources are managed through an integrated approach which recognises the importance of ki uta ki tai to Ngāi Tahu and the wider community, and the inter-relationships between ecosystems, natural processes and with freshwater.

SD-02 Urban Development

Urban development and infrastructure that:

1. is consolidated and integrated with the well-functioning urban environment centres;
2. ~~that~~ recognises ~~existing character~~, planned urban form and 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-01;
5. supports a hierarchy of urban centres, with the District's main centres in Rangiora, Kaiapoi, Oxford and Woodend being:
 - (a) the primary centres for community facilities;
 - (b) the primary focus for retail, office and other commercial activity; and
 - (c) the focus around which residential development and intensification can occur.
6. provides opportunities for business activities to establish and prosper within a network of business and industrial areas zoned appropriate to their type and scale of activity and which support district self-sufficiency;
7. provides people with access to a network of spaces within urban environments for open space and recreation;
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-04 Rural ~~land~~ environment

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 primary production activities, ~~activities that directly support rural production activities~~ rural industry 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 primary production activities are not limited by new incompatible sensitive activities.

Appendix B. Recommended Responses to Submissions and Further Submissions

The recommended responses to the submissions made on this topic are presented in Table B 1 below.

Table B 1: Recommended responses to submissions and further submissions - Introduction

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to Proposed Plan?
192.28 ¹⁴ ¹⁵	Royal Forest & Bird Protection Society of New Zealand Inc	Introduction	Amend Strategic Directions introduction: "For the purpose of District Plan development, including plan changes and <u>resource consents</u> , the strategic objectives in this chapter provide direction for the more detailed provisions contained in <u>other Part 2 and Part 3 chapters</u> of the District Plan. ..."	3.2	Reject	See the relevant section of the report.	No
195.19	Trans Power New Zealand Limited	Introduction	Retain the 'Interpretation and application of this chapter' part of the Strategic Directions Chapter as notified.		Accept	Agree with submitter.	No
249.197 ¹⁶	MainPower New Zealand Limited	Introduction	Amend Strategic Directions Introduction: "... 1. the SD may <u>provides</u> 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, <u>with the SD having primacy over other objectives and policies of the District Plan.</u> and no hierarchy exists between them. "	3.2	Reject	See the relevant section of the report.	No
284.32	Clampett Investments Limited	Introduction	Amend the Strategic Directions 'interpretation and application of this chapter': "...For the purpose of District Plan development, including plan changes, the strategic objectives in this chapter provide direction for the more detailed provisions contained in the District Plan. For the purpose of District Plan implementation, including the determination of resource consent applications. <u>For the avoidance of doubt, this means that for resource consent applications, the Strategic Objectives may require specific consideration and application to proposals, as a relevant consideration under section 104(1)(b)(vi).</u> ..."	3.2	Reject	See the relevant section of the report.	No
325.1 ¹⁷	Kainga Ora – Homes and Communities	Introduction	Amend: "1. the SD may <u>provides</u> 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, <u>with the SD having primacy over other objectives and policies of the District Plan.</u> and no hierarchy exists between them. "	3.2	Reject	See the relevant section of the report.	No
326.34	Rolleston Industrial Developments Limited	Introduction	Amend Strategic Directions Introduction: "...For the purpose of District Plan development, including plan changes, the strategic objectives in this chapter provide direction for the more detailed provisions contained in the District Plan. For the purpose of District Plan	3.2	Reject	See the relevant section of the report.	No

¹⁴ Federated Farmers FS83 oppose¹⁵ Transpower FS92 support¹⁶ Transpower FS92 oppose¹⁷ Transpower FS92 oppose

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to Proposed Plan?
			implementation, including the determination of resource consent applications. <u>For the avoidance of doubt, this means that for resource consent applications, the Strategic Objectives may require specific consideration and application to proposals, as a relevant consideration under section 104(1)(b)(vi). ..."</u>				
412.3	Templeton Group	Introduction	Retain Strategic Directions introduction as notified.		Accept	Agree with submitter.	No
282.89	Woolworths New Zealand Limited	Introduction	Amend to adopt a 'centres plus approach' that recognises the primacy of town centres but also that business activity should be enabled in other zones where appropriate. This approach recognises that functional need and catchment drivers may dictate the location of supermarket operations, on the fringe, or in some cases, outside of centres. It enables efficient use of all Commercial and Mixed-Use Zones relative to the centres hierarchy.	3.3	Reject	See the relevant section of the report.	No
282.90	Woolworths New Zealand Limited	Introduction	Amend to address growth constraints by zoning appropriately to accommodate anticipated commercial growth in the district and to achieve its own goal of district self-sufficiency.	3.3	Reject	See the relevant section of the report.	No
282.91	Woolworths New Zealand Limited	Introduction	The Proposed District Plan fails to meet its strategic directions towards self-sufficiency as it does not set minimum targets for development capacity. It also fails to clearly articulate or establish its obligations under the National Policy Statement on Urban Development 2020 (NPS-UD) in respect to housing or business growth. There is significantly limited opportunity for business activity to deliver necessary services for growing communities and to continue to develop well-functioning urban environments in accordance with the NPS-UD.	3.3	Reject	See the relevant section of the report.	No
282.95	Woolworths New Zealand Limited	Introduction	A more enabling approach to supermarkets is needed, along with a more flexible approach to consenting them. The importance of supermarkets contributing to well-functioning urban environments, where such activities are conveniently located relative to the catchments they serve, needs to be recognised.	3.3	Reject	See the relevant section of the report.	No
282.97	Woolworths New Zealand Limited	Introduction	Amend to recognise Large Format Retail Zone as supporting centre zones to deliver a broad, robust, and appropriately diverse economic strategy that provides areas for main street retail and large format retail.	3.3	Reject	See the relevant section of the report.	No
282.100	Woolworths New Zealand Limited	Introduction	Seek consideration of more aspirational zoning provisions for growth, utilising the strategic process of a plan review to Non-comprehensively and sustainably plan for and enable growth.	3.3	Reject	See the relevant section of the report.	No
282.117	Woolworths New Zealand Limited	Introduction	Consider Strategic Directions objectives are not effectively implemented by zone rules given the activity status' for supermarkets.	3.3	Reject	See the relevant section of the report.	No

Table B 2: Recommended responses to submissions and further submissions Objective SDO1

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to Proposed Plan?
111.2	CA & GJ McKeever	SD-O1	Retain SD-O1 as notified		Accept	Accept in part, subject to amendments made in response to other submissions.	No

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to Proposed Plan?
162.1	John Stevenson	SD-O1	Retain SD-O1 as notified		Accept	Accept in part, subject to amendments made in response to other submissions.	No
192.29 ¹⁸	Forest and Bird	SD-O1	Amend SD-O1: "Across the District: 1. there is an overall net gain in the quality and quantity of indigenous ecosystems and habitat, and indigenous biodiversity <u>across the district and significant indigenous vegetation and habitats are protected</u> ; 2. the natural character of the coastal environment, freshwater bodies and <u>including</u> wetlands is preserved or enhanced, or restored where degradation has occurred; 3. outstanding natural features and outstanding natural landscapes are identified and their values recognised and protected; 4. people have access to a network of natural areas for open space and recreation, conservation and education, including within riparian areas, the coastal environment, the western ranges, and within urban environments; and 5. land and water resources are managed through an integrated approach which recognises the importance of ki uta ki tai to Ngāi Tahu and the wider community, and the inter-relationships between ecosystems, natural processes and with freshwater; <u>and</u> 6. <u>the mauri of ecosystems and indigenous biodiversity is safe guarded and freshwater is managed in a way that gives effect to Te Mana o te Wai.</u> "	3.4	Accept in part	See the relevant section of the report. For consistency with the National Policy Statement on Indigenous Biodiversity the reference to "overall net gain" has been amended to just "net gain". The addition to point 1 is included to improve consistency with ECO-O1. The inclusion of "including" in point 2 is rejected as some of the most important wetlands in the district are in the coastal environment. The change implies that only the freshwater wetlands are important. The addition of point 6 is partially accepted, with the reference changes from Te Mana o te Wai to Te Rito o te Harakeke to be consistent with the NPS on Indigenous Biodiversity.	Yes
195.20 ¹⁹	Transpower New Zealand Limited	SD-O1	Amend SD-O1: "... 3. outstanding natural features and outstanding natural landscapes are identified and their values recognised and protected <u>from inappropriate subdivision, use and development</u> ; ..."	3.2	Reject	See the relevant section of the report.	No
249.198	MainPower New Zealand Limited	SD-O1	Retain SD-O1 as notified		Accept	Accept in part, subject to amendments made in response to other submissions.	No
256.2 ²⁰	Chloe Chai and Mark McKitterick	SD-O1	Retain SD-O1 as notified		Accept	Accept in part, subject to amendments made in response to other submissions.	No
295.69	Horticulture New Zealand	SD-O1	Amend (1) to clarify how 'overall net gain' will be measured and monitored, potentially through cross referencing other provisions. Retain balance of SD-O1.	3.4	Accept in part	See the relevant section of the report.	No
316.1 ²¹	ECan	SD-O1	Retain SD-O1 as notified		Accept	Accept in part, subject to amendments made in response to other submissions.	No
325.2	Kainga Ora – Homes and Communities	SD-O1	Retain SD-O1 as notified		Accept	Accept in part, subject to amendments made in response to other submissions.	No

¹⁸ Federated Farmers FS83 oppose¹⁹ Chorus, Spark & Vodafone FS95 support²⁰ M McKitterick FS2 oppose²¹ R & G Spark FS37 oppose

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to Proposed Plan?
326.35	Rolleston Industrial Developments Limited	SD-O1	Retain SD-O1 as notified		Accept	Accept in part, subject to amendments made in response to other submissions.	No
411.1	Ngāi Tahu Property	SD-O1	Retain SD-O1 as notified		Accept	Accept in part, subject to amendments made in response to other submissions.	No
414.51	Federated Farmers of New Zealand Inc.	SD-O1	Support the concept of 'overall net gain in the quality and quantity of indigenous ecosystems and habitat'. Ensure that policies, rules, methods, and appendices/schedules actually implement all aspects of this objective in aggregate and individually. This may require additional rules and methods, and these have been requested where they apply. Delete SD-O1(5), as this appears to be more appropriate within the Canterbury Regional Plan.	3.4	Reject	See the relevant section of the report. Objective has been amended to be consistent with NPS on Indigenous Biodiversity with regards to "overall net gain". Point SD-O1(5) gives effect to Policy 9.3.3 of the Canterbury Regional Policy Statement.	No
418.2	Keith Godwin	SD-O1	Retain SD-O1 as notified		Accept	Accept in part, subject to amendments made in response to other submissions.	No
419.3	Department of Conservation	SD-O1	Retain SD-O1 as notified		Accept	Accept in part, subject to amendments made in response to other submissions.	No

Table B 3: Recommended responses to submissions and further submissions - Objective SDO2

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to Proposed Plan?
41.13	Fulton Hogan	SD-O2	Amend SD-O2 to include direct reference to reverse sensitivity: ... 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 <u>while avoiding reverse sensitivity effects</u> ;...	3.7	Reject	See the relevant section of the report. Is covered under SD-O4(2) and RURZ-P8.	No
52.3	Ara Poutama Aotearoa – Department of Corrections	SD-O2	Amend SD-O2: ... 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; <u>and</u> 11. enables the community to provide for their wellbeing.	3.2	Reject	See the relevant section of the report. The proposed wording in Variation 1 (SD-O2) reflects Objective 1 of the NPS-UD and recognises that urban environments include aspects other than physical resources.	No
62.2	Chorus New Zealand Ltd, Spark New Zealand Trading Ltd, and Vodafone New Zealand Ltd	SD-O2	Amend SD-O2 by adding an additional clause to the objective: Urban development and infrastructure that: <u>x. ensures new development and intensification is adequately served by telecommunications, broadband and electricity;</u>	3.8	Reject	See the relevant section of the report.	No
99.2	Ken Fletcher	SD-O2	Amend SD-O2: Urban development and infrastructure that: 1. is consolidated and integrated with the urban environment;	3.5	Reject	See the relevant section of the report.	No

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to Proposed Plan?
			<p>2. that recognises existing character, amenity values, and is attractive and functional to residents, businesses and visitors;</p> <p>3. utilises the District Council's reticulated wastewater system, and potable water supply and stormwater infrastructure where available;</p> <p>4. <u>provides for affordable housing options in all zones across the district;</u></p> <p>5. provides a range of housing opportunities, focusing new residential activity within <u>and around</u> existing towns, and identified development areas in Rangiora and Kaiapoi, in order to achieve the housing bottom lines in UFD-O1; supports a hierarchy of urban centres, with the District's main centres in Rangiora, Kaiapoi, Oxford and Woodend being:</p> <p>a. the primary centres for community facilities;</p> <p>b. the primary focus for retail, office and other commercial activity; and</p> <p>c. the focus around which residential development and intensification can occur....</p>				
111.3 ²²	CA and GJ McKeever	SD-O2	<p>Amend SD-O2(9) to allow for suitable Large Lot Residential areas to be considered and not limited to Waimakariri Rural Residential Strategy, otherwise Large Lot Residential Zones within Mandeville would be inconsistent with this objective.</p> <p>...</p> <p>Provides limited opportunities for Large Lot Residential development in identified areas, subject to adequate infrastructure;</p> <p>...</p>	3.5	Reject	See the relevant section of the report.	No
142.2	Te Ngāi Tūāhuriri Rūnanga	SD-O2	Retain SD-O2 as notified		Accept	Accept in part, subject to amendments made in response to other submissions.	No
145.7	Daiken New Zealand Limited	SD-O2	Retain SD-O2 as notified		Accept	Accept in part, subject to amendments made in response to other submissions.	No
162.2 ²³	John Stevenson	SD-O2	<p>Amend SD-O2(9) to allow for suitable Large Lot Residential areas to be considered. "Identification" not to be limited to Waimakariri Rural Residential Strategy, given it does not include Mandeville. Otherwise Proposed 4A/4B RLL zone in Mandeville proposed by Council is already inconsistent with this objective.</p> <p>...</p> <p>9. provides limited opportunities for Large Lot Residential development in identified areas, subject to adequate infrastructure;</p> <p>...</p>	3.5	Reject	See the relevant section of the report.	No
183.1 ²⁴	Richard and Geoff Spark	SD-O2	<p>Amend SD-O2:</p> <p>Urban development and infrastructure that:</p> <p>...</p> <p>4. provides a range of housing opportunities, focusing new residential activity within existing towns, and identified development areas in Rangiora and</p>	3.2	Reject	See the relevant section of the report.	No

²² Waka Kotahi FS110 oppose

²³ Waka Kotahi FS110 oppose

²⁴ Bellgrove FS85 oppose

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to Proposed Plan?
			Kaiapoi, in order to <u>as a minimum</u> achieve the housing bottom lines in UFD-O1...				
192.3	Forest and Bird	SD-O2	Amend SD-O2 to insert additional clause: <u>X incorporates and sustains indigenous biodiversity</u>	3.4	Reject	See the relevant section of the report. Issue covered under SD-O1.	No
223.2	John and Carol Broughton	SD-O2	Amend SD-O2(4): :.... 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 <u>as a minimum</u> achieve the housing bottom lines in UFD-O1;...	3.2	Reject	See the relevant section of the report.	No
236.2 ²⁵	Rick Allaway and Lionel Larsen	SD-O2	Amend SD-O2: 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 <u>as a minimum</u> achieve the housing bottom lines in UFD-O1;...	3.2	Reject	See the relevant section of the report.	No
242.2	Dalkeith Holdings Limited	SD-O2	Amend SD-O2: 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 <u>as a minimum</u> achieve the housing bottom lines in UFD-O1...	3.2	Reject	See the relevant section of the report.	No
246.3 ²⁶	Miranda Hales	SD-O2	Amend SD-O2: Urban development and infrastructure that: ... 1. provides a range of housing opportunities, focusing new residential activity within existing towns, and identified development areas in Rangiora and Kaiapoi, in order to <u>as a minimum</u> achieve the housing bottom lines in UFD-O1...	3.2	Reject	See the relevant section of the report.	No
249.199	MainPower	SD-O2	Retain SD-O2 as notified		Accept	Accept in part, subject to amendments made in response to other submissions.	No
254.18 ²⁷	CIAL	SD-O2	Amend SD-O2: Urban development and infrastructure that: 1. is consolidated and integrated with the urban environment; 2. <u>does not affect the efficient operation, use, development, appropriate upgrading and safety of strategic infrastructure, critical infrastructure, and regionally significant infrastructure;</u> ...	3.8	Reject	See the relevant section of the report.	No

²⁵ D & S Elley FS28 support; JP Bailey Family Trust FS29 support; K Manson & N Kuru FS30 support; R Fraser FS31 support; L N R deLacy FS 32 support; L Marriott FS33 support

²⁶ Michael & Jean Schluter FS89 support

²⁷ Waka Kotahi FS110 support; KiwiRail FS99 support

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to Proposed Plan?
256.3 ²⁸	Chloe Chai and Mark McKitterick	SD-O2	Amend SD-O2(9) to allow for suitable Large Lot Residential areas to be considered and not limited to Waimakariri Rural Residential Strategy, otherwise Large Lot Residential Zones within Mandeville would be inconsistent with this objective. ... 9. provides limited opportunities for Large Lot Residential development in in identified areas, subject to adequate infrastructure...	3.5	Reject	See the relevant section of the report.	No
275.4 ²⁹	Waka Kotahi NZ Transport Agency	SD-O2	Insert an additional clause in SD-O2: <u>(x)recognises the importance of infrastructure, including the land transport network in achieving integrated urban development;</u>	3.8	Reject	See the relevant section of the report. This is covered under Objective TRAN-O1 and is not a strategic direction issue.	No
277.1	MoE	SD-O2	Amend SD-O2: ... 9. provides limited opportunities for Large Lot Residential development in identified areas, subject to adequate infrastructure and <u>10. provides for educational facilities throughout the district to support urban growth and development; and...</u>	3.10	Reject	See the relevant section of the report. The provision of education facilities is provided for in Policy RESZ-P6 and is not a strategic direction issue.	No
278.3	Oranga Tamariki – Ministry for Children	SD-O2	Amend SD-O2: Urban development and infrastructure that: ... 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 SASMSCHED1. and <u>11. Enables the community to provide for their wellbeing</u>	3.2	Reject	See the relevant section of the report. The proposed wording in Variation 1 (SD-O2) reflects Objective 1 of the NPSUD and recognises that urban environments include aspects community wellbeing.	Yes
282.1	Woolworths New Zealand Limited	SD-O2	Retain SD-O2 as notified		Accept	Accept in part, subject to amendments made in response to other submissions.	No
284.33	Clampett Investments Limited	SD-O2	Retain SD-O2 as notified		Accept	Accept in part, subject to amendments made in response to other submissions.	No
290.3	Doncaster Developments Limited	SD-O2	Amend SD-O2: "... 4). Provides a range of housing opportunities, focusing new residential activity within existing towns, and identified development areas in Rangiora and Kaiapoi, and other sites that meet the criteria set out in policy UFD-P2 part 2, in order to achieve the housing bottom lines in UFD-O1 <u>provide sufficient feasible development capacity to meet housing demand...."</u>	3.2	Reject	See the relevant section of the report. The submission opposes the use of housing bottom lines, which Tier 1 and 2 local authorities are required to set under Policy 7 of the NPSUD.	No
295.70 3031	Hort NZ	SD-O2	Amend SD-O2: "... <u>11. that avoids versatile soils and avoids creating incompatible activities on rural zone boundaries."</u>	3.6	Reject	See the relevant section of the report.	No

²⁸ Waka Kotahi FS110 oppose; M McKitterick FS2 oppose.

²⁹ KiwiRail FS99 support

³⁰ Federated Farmers FS83 support

³¹ Michael & Jean Schluter FS89 oppose; R & G Spark FS37 oppose; M Hales FS46 oppose

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to Proposed Plan?
298.1 ³²	Nick and Cilla Taylor	SD-O2	Rezone West Rangiora Development Area to General Residential Zone.		N/A	To be covered in the Future Urban Development Areas Section 42a report.	No
316.2 ³³	ECan	SD-O2	Retain SD-O2 as notified		Accept	Accept in part, subject to amendments made in response to other submissions.	No
325.3 ³⁴³⁵	Kainga Ora	SD-O2	Amend SD-O2: "Urban development and infrastructure that: 1. is consolidated and integrated with the <u>well-functioning</u> urban environments; 2. that recognises existing character, <u>planned urban form and amenity</u> values, and is attractive and functional to residents, businesses and visitors; ... 4. provides a range <u>and mix</u> of housing opportunities, focusing new residential activity within existing towns, and identified development areas in Rangiora and Kaiapoi, in order to achieve <u>at all times at least</u> the housing bottom lines in UFD-O1; ... 10. recognise and support Ngāi Tūāhuriri cultural values through the protection of sites and areas of significance to Māori identified in SASM-SCHED1. "	3.2	Accept in part	See the relevant section of the report. Accept the changes to SD-O2(1) to be consistent with the wording of Objective 1 of the NPS-UD. Accept changes to SD-O2(2) as they are covered in other objectives in Strategic Direction and objectives and policies of Urban Form and Development. Reject changes to SD-O2(4) as the wording does not reflect the intent of the NPS-UD, as the housing bottom lines are set for short-medium and long term. Reject changes to SD-O2(10) as it is inconsistent with the Sections 6(e) and 8 of the RMA.	Yes
326.39	Rolleston Industrial Developments Limited	SD-O2	Amend SD-O2: "... 4. provides a range of housing opportunities <u>in accordance with the NPS-UD</u> , focusing new residential activity within existing towns, and identified development areas in Rangiora and Kaiapoi; 5. supports a hierarchy of urban centres, with the District's main centres in Rangiora, Kaiapoi, Oxford and Woodend being: ... c. the focus around which for residential development and intensification can occur ..."	3.5	Reject	See the relevant section of the report. Reject changes to SD-O2(4) as the housing bottom line in Policy UFD-O1 meets the requirements of the NPS-UD. Reject changes to SD-O2(5)(c) as it constrains residential development to the urban centres listed and does not enable it to occur in other areas such as Tuahiwi, Ashley, Pegasus or Mandeville.	No
347.5	Ravenswood Developments Limited	SD-O2	Amend SD-O2(5) to replace "Woodend" with "Ravenswood".	3.2	Reject	See the relevant section of the report. Place names are determined by the New Zealand Geographic Board and not the District Council.	No

³² RJ Paterson Family Trust FS91 support

³³ R & G Spark FS37 oppose

³⁴ Michael & Jean Schluter FS89 support in part

³⁵ R & G Spark FS37 support; M Hales FS46 support

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to Proposed Plan?
360.3 ³⁶	Christchurch City Council	SD-O2	Supports wording of SD-O2(2) as it recognises changes likely to occur to existing character with intensification, and reflects direction provided by Policy 6 of National Policy Statement on Urban Development (NPS-UD).		Accept	Accept in part, subject to amendments made in response to other submissions.	No
408.2	Bellgrove Rangiora Limited	SD-O2	Retain SD-O2 as notified		Accept	Accept in part, subject to amendments made in response to other submissions.	No
411.2 ³⁷	Ngāi Tahu Property	SD-O2	Amend SD-O2: "Urban development and infrastructure that: 1. <u>as far as possible</u> is consolidated and integrated with the urban environment; ... 4. provides a range of housing opportunities, <u>and where possible</u> focus ing <u>es</u> 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"	3.5	Reject	See the relevant section of the report. The proposed change to SD-O2(1) and (4) are not specific and would enable out of sequence development that is inconsistent with the policy direction within the district plan.	No
414.52	Federated Farmers	SD-O2	Amend SD-O2(5): "... 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. <u>support and service centres for primary production; and</u> d. the focus around which residential development and intensification can occur...."	3.10	Reject	See the relevant section of the report. The proposed change to SD-O2(5)(c) is inconsistent with intent of the objective around the hierarchy of urban development.	No
418.3 ³⁸	Keith Godwin	SD-O2	Amend SD-O2(9) to allow for suitable Large Lot Residential areas to be considered and not limited to Waimakariri Rural Residential Strategy, otherwise Large Lot Residential Zones within Mandeville would be inconsistent with this objective. "... 9. provides limited opportunities for Large Lot Residential development in identified areas , subject to adequate infrastructure;"	3.5	Reject	See the relevant section of the report. Enabling uncontrolled Large Lot Residential development across the district will be inconsistent with Central Government policy direction in the NPSUD and NPSHPL.	No
419.31 ³⁹	DoC	SD-O2	Retain SD-O2 as notified		Accept	Accept in part, subject to amendments made in response to other submissions.	No

³⁶ Kainga Ora FS88 oppose

³⁷ Waka Kotahi FS110 oppose

³⁸ Waka Kotahi FS110 oppose

³⁹ Waka Kotahi FS110 support

Table B 4: Recommended responses to submissions and further submissions - Objective SDO3

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to Proposed Plan?
41.14 ⁴⁰	Fulton Hogan	SD-O3	Amend SD-O3 to recognise the role that the materials supply chain provides in achieving infrastructure outcomes by including the following new clause: "... 3. <u>infrastructure is supported through a ready, local supply of the physical construction materials requirements of infrastructure;...</u> "	3.6, 3.8	Reject	See the relevant section of the report. The intent of the submission is covered under policy RURZ-P2 where primary production activities, such as quarries, are provided for. It is not a matter that needs to be addressed within strategic directions.	No
62.3	Chorus New Zealand Limited, Spark New Zealand Trading Limited and Vodafone New Zealand Limited	SD-O3	Retain SD-O3 as notified		Accept	Agree with submitter.	No
111.4	CA and GJ McKeever	SD-O3	Retain SD-O3 as notified		Accept	Agree with submitter.	No
162.3	John Stevenson	SD-O3	Retain SD-O3 as notified		Accept	Agree with submitter.	No
192.31 ⁴¹	Forest and Bird	SD-O3	Amend SD-O3: "... 2. infrastructure, including strategic infrastructure, critical infrastructure and regionally significant infrastructure: a. is able to operate efficiently and effectively; <u>while</u> <u>ii. managing the adverse effects of other activities on infrastructure, including managing reverse sensitivity; and</u> <u>b. is enabled, while the benefits of new infrastructure development are recognised:</u> 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;"	3.7	Reject	See the relevant section of the report. Proposed changes to SD-O3(2)(a)(ii) is a repletion of the SD-O3(2)(b)(ii). The benefits of infrastructure are recognised in policy EI-P1 and is not considered to be a strategic direction matter that is required to provide high level direction for the District Plan.	No
195.21	Transpower New Zealand Limited	SD-O3	Retain SD-O3 as notified		Accept	Agree with submitter.	No
249.200 ⁴²	MainPower New Zealand Limited	SD-O3	Amend SD-O3: "... 2. <u>the infrastructure needs of the community are fulfilled recognising the social, economic, environmental and cultural benefits that infrastructure provides.</u> 3. Infrastructure: including strategic infrastructure, critical infrastructure a. is able to operate efficiently and effectively; and b. is enabled, while:	3.7, 3.8	Reject	See the relevant sections of the report.	No

⁴⁰ Federated Farmers FS83 support⁴¹ Waka Kotahi FS110 oppose; Transpower FS92 oppose⁴² KiwiRail FS99 oppose

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to Proposed Plan?
			<p>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</p> <p>ii. managing <u>reverse sensitivity effects and conflict between incompatible activities, including avoiding development which would limit the operation or development of existing and/or consented important infrastructure, regionally significant infrastructure and critical infrastructure. the adverse effects of other activities on infrastructure, including managing reverse sensitivity.</u></p> <p>iii. <u>avoiding adverse effects on the electricity distribution network and major electricity distribution lines, including by identifying a buffer corridor within which buildings, excavations and sensitive activities will generally not be provided for...</u>"</p>				
254.19 ⁴³	Christchurch International Airport Limited	SD-O3	<p>Amend SD-O3:</p> <p>"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;</p> <p>2. <u>the social, economic and environmental and cultural benefits of infrastructure, including strategic infrastructure, critical infrastructure, and regionally significant infrastructure:</u></p> <p>a. <u>is recognised and provided for, and its safe, efficient and effective development, upgrading, maintenance and operation is enabled is able to operate efficiently and effectively;</u> and</p> <p>b. <u>is enabled, while:</u></p> <p>— <u>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</u></p> <p>— <u>ii. managing the adverse effects of other activities on infrastructure, including managing reverse sensitivity;</u></p> <p>— <u>c. strategic infrastructure, critical infrastructure and regionally significant infrastructure is protected by avoiding adverse effects from incompatible development and activities, including reverse sensitivity effects. This includes:</u></p> <p>— <u>i. avoiding noise sensitive activities within the Christchurch International Airport 50 dBA Ldn Air Noise Contour, except within the existing Kaiapoi residential area (where density is to be retained at one unit per 600m2); and</u></p> <p>— <u>ii. managing the risk of birdstrike to aircraft using Christchurch International Airport;</u></p> <p>3. <u>the adverse effects of strategic infrastructure, critical infrastructure and regionally significant infrastructure on the surrounding environment are</u></p>	3.2, 3.8	Reject	<p>See the relevant section of the report. Most of the changes proposed are not strategic direction in outcome but are more policy specific. The reference to social, economic and environmental and cultural benefits of infrastructure is too broad and result in consideration given towards infrastructure development that overrides other provisions of the District Plan. Issues associated with bird strike and aircraft noise are specific to the area which is affected by airport operations and not a district wide matter. Discussions about the effects of aircraft noise and bird strike are covered in the Noise and Rural Zone hearings reports. The proposed change to SD-O3(3) is inconsistent with other objectives and policy within the district plan and would result in the provision of infrastructure having dominance over all over parts of the district.</p>	No

⁴³ Momentum FS63 oppose

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to Proposed Plan?
			<u>managed, having regard to the economic benefits and practical, technical and operational needs of that infrastructure...."</u>				
256.4 ⁴⁴	Chloe Chai and Mark McKitterick	SD-O3	Retain SD-O3 as notified		Accept	Agree with submitter.	No
275.5	Waka Kotahi NZ Transport Agency	SD-O3	Retain SD-O3 as notified		Accept	Agree with submitter.	No
284.34	Clampett Investments Limited	SD-O3	Retain SD-O3 as notified		Accept	Agree with submitter.	No
295.71	Hort NZ	SD-O3	Amend SD-O3: 2. ... b. is enabled, while: i. managing adverse effects on the surrounding environment, having regard to the social, cultural and economic <u>costs and</u> benefits, functional need and operational need of the infrastructure; and..."		Reject	The wording in SD-O3(2)(b)(i) is consistent with the Canterbury RPS. The provision of infrastructure is sometimes constrained by the location, any consideration of costs on landowners is inconsistent with the NPSET.	No
303.8	Fire and Emergency New Zealand	SD-O3	Retain SD-O3 as notified		Accept	Agree with submitter.	No
325.4	Kainga Ora	SD-O3	Retain SD-O3 as notified		Accept	Agree with submitter.	No
326.36	Rolleston Industrial Developments Limited	SD-O3	Retain SD-O3 as notified		Accept	Agree with submitter.	No
373.12	KiwiRail Holdings Limited	SD-O3	Retain SD-O3 as notified		Accept	Agree with submitter.	No
418.4	Keith Godwin	SD-O3	Retain SD-O3 as notified		Accept	Agree with submitter.	No
419.32 ⁴⁵	DoC	SD-O3	Amend SD-O3: "a. is able to operate efficiently and effectively; and 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>	3.4	Reject	See the relevant section of the report. The proposed changes to SD-O3(b) are inconsistent with the intent of the objective and are more policy specific. Consideration has been given the adverse effects of infrastructure development through SD-O3(2)(b)(i) and (ii), and EI-P5.	No

⁴⁴ M McKitterick FS2 oppose

⁴⁵ Transpower FS92 oppose

Table B 5: Recommended responses to submissions and further submissions - Objective SDO4

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to Proposed Plan?
41.15	Fulton Hogan	SD-O4	Amend SD-O4 to reference 'primary production' as opposed to 'rural production' and use the definition of 'rural industry': "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 primary production activities by: 1. providing for rural <u>primary</u> production activities, activities that directly support rural production activities <u>rural industry</u> 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 <u>primary</u> production activities are not limited by new incompatible sensitive activities."	3.10	Accept	See the relevant sections of the report.	Yes
61.2	North Canterbury Clay Target Association	SD-O4	Amend the first paragraph of SD-O4 and point 2 to include reference to recreation activities.		Reject	Recreation within the rural environment is not a Strategic Direction matter. It is covered under RURZ-P3.	No
111.5	CA and GJ McKeever	SD-O4	Neutral on SD-O4		N/A	Submission relates to rezoning of San Dona and is covered in the Section 42a report for Rural Zones.	No
142.3	Te Ngāi Tūāhuriri Rūnanga	SD-O4	Retain SD-O4 as notified		Accept	Accept in part, subject to amendments made in response to other submissions.	No
145.8	Daiken New Zealand Limited	SD-O4	Amend SD-O4(2) (or to like effect): "... 2. ensuring that within rural areas the establishment and operation of rural production activities <u>and the continued operation of existing non-rural activities</u> are not limited by new incompatible sensitive activities."	3.2	Reject	See the relevant section of the report. The protection of existing non-rural activities is not dependent upon the management of the land to provide for future production and is also not a strategic direction matter that applies to the whole of the district.	No
162.4	John Stevenson	SD-O4	Neutral on SD-O4		Accept	Submission relates to rezoning of San Dona and is covered in the hearing report on Rural Zones.	No
169.11 ⁴⁶	New Zealand Pork	SD-O4	Amend 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. Rural Environment	3.10	Reject	See the relevant section of the report.	No

⁴⁶ Hort NZ FS47 support

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to Proposed Plan?
			<u>Waimakariri District's productive land and versatile soil is retained for primary production, and primary production activities are enabled to ensure that rural communities can thrive, use resources efficiently and contribute positively to the district and national identity and economy."</u>				
192.32	Forest and Bird	SD-O4	Amend SD-O4 to refer to 'Rural Zones', or provide clear definition of rural land/environment, excluding Significant Natural Areas.		Reject	The objective relates to the wider rural environment and the activities that occur within the wider environment.	No
249.201	MainPower New Zealand Limited	SD-O4	Retain SD-O4 as notified		Accept	Accept in part, subject to amendments made in response to other submissions.	No
254.2	Christchurch International Airport Limited	SD-O4	Amend SD-O4: "Outside of identified residential development areas and the Special Purpose Zone (Kāinga Nohoanga), rural land is managed to ensure that: <u>1. it remains available for productive rural activities by:</u> <u>a. providing for rural production activities, activities that directly support rural production activities and activities reliant on the natural resource of Rural Zones and limit other activities; and</u> <u>b. ensuring that within rural areas the establishment and operation of rural production activities are not limited by new incompatible sensitive activities; and</u> <u>and</u> <u>2. development and land use does not adversely affect the efficient operation, use and development of strategic infrastructure."</u>	3.8	Reject	See the relevant section of the report	No
256.5 ⁴⁷	Chloe Chai and Mark McKitterick	SD-O4	Neutral on SD-O4		N/A	Submission relates to rezoning of San Dona and is covered in the hearing report on Rural Zones.	No
277.11 ⁴⁸	MoE	SD-O4	Amend SD-O4(1): "... 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..."	3.10	Reject	See the relevant section of the report.	No
284.35	Clampett Investments Limited	SD-O4	Retain SD-O4 as notified		Accept	Accept in part, subject to amendments made in response to other submissions.	No
295.72	Hort NZ	SD-O4	Amend title of SD-O4 to "Rural Environment". Retain balance of SD-O4.		Accept	Acknowledge that the objective relates use of the land.	Yes
298.2 ⁴⁹	Nick and Cilla Taylor	SD-O4	Rezone West Rangiora Development Area to General Residential Zone.		N/A	The issue will be covered in the Future Urban Development Areas Section 42a.	No
300.2	Eyrewell Dairy Limited	SD-O4	No direct amendments sought		Accept	Accept in part, subject to amendments made in response to other submissions.	No
316.3	ECan	SD-O4	Amend SD-O4 to more explicitly provide for the need to make appropriate use of soil which is valued for existing or foreseeable future primary production, or through further fragmentation of rural land.	3.6	N/A	See the relevant section of the report. This issue will be covered in the Rural Zones Section 42a.	Yes

⁴⁷ M McKitterick FS2 oppose

⁴⁸ Hort NZ FS47 oppose

⁴⁹ RJ Paterson Family Trust FS91 support

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to Proposed Plan?
5051							
326.40	Rolleston Industrial Developments Limited	SD-O4	Amend SD-O4: "Outside of identified residential development areas and the Special Purpose Zone (Kāinga Nohoanga), <u>unless rezoned</u> , rural land is managed to ensure that it remains available for productive rural activities by:..."		Reject	Council has identified sufficient land to meet the housing bottom lines as required under the NPS-UD	No
411.3	Ngāi Tahu Property	SD-O4	Amend SD-O4 Rural Land: "... 1. <u>primarily</u> 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;..."	3.10	Accept	See the relevant section of the report. Other uses for rural land have been provided for within the activity rules for the Rural Zone chapters.	No
414.53 5253	Federated Farmers	SD-O4	Amend SD-O4: "... 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 ; 2. <u>limit other activities</u> ; 3. ensuring that within rural areas the establishment and operation of rural production activities are not limited by new incompatible sensitive activities; <u>and</u> 4. <u>protecting LUC 1 – 3 class land and other identified versatile soils from subdivision and development in order to maintain the life-supporting capacity of soil.</u> "	3.6	Reject	See the relevant section of the report. Reject the proposed amendment SD-O4 as it does not identify what other activities are when taken out of context with the wording in SD-O4(1). The NPSHPL will be addressed in the hearings report for the General Rural Zone.	No
418.5	Keith Godwin	SD-O4	Neutral on SD-O4		N/A	Submission relates to rezoning of San Dona and is covered in the Section 42a hearing report on Rural Zones.	No
419.33	DoC	SD-O4	Amend SD-O4: "... 3. <u>recognise and support Ngāi Tūāhuriri cultural values through the protection of sites and areas of significance to Māori identified in SASMSCHED1</u> 4. <u>recognise and protect historic heritage through the protection of Historic Heritage Items identified in HH-SCHED2.</u> "		Reject	These matters are not specific to the use of land for rural production. Matters relating to sites and areas of significance to Māori and historic heritage are covered by the various hearing reports for those topics.	No
420.2	Dairy Holdings Limited	SD-O4	Retain SD-O4 as notified		Accept	Accept in part, subject to amendments made in response to other submissions	No

⁵⁰ Hort NZ FS47 support; CIAL FS80 support

⁵¹ R & G Spark FS37 oppose; M Hales FS46 oppose

⁵² Hort NZ FS47 support

⁵³ R & G Spark FS37 oppose; M Hales FS46 oppose

Table B 6: Recommended responses to submissions and further submissions - Objective SDO5

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to Proposed Plan?
111.6	CA and GJ McKeever	SD-O5	Neutral on SD-O5		Accept	Submission relates to rezoning of San Dona and is covered in the Section 42a hearing report on Rural Zones.	No
142.4	Te Ngāi Tūāhuriri Rūnanga	SD-O5	Retain SD-O5 as notified		Accept	Agree with submitter	No
162.5	John Stevenson	SD-O5	Neutral on SD-O5		Accept	Submission relates to rezoning of San Dona and is covered in the Section 42a hearing report on Rural Zones.	No
178.6 ⁵⁴	Heritage New Zealand Pouhere Taonga	SD-O5	Include a new objective to provide high level direction regarding the identification and recognition of places, landscapes, and features which are significant to Waimakariri's character and cultural heritage, to ensure their protection for future generations.		Reject	Objective SD-O5(1) and (2) provides for the recognition and protection of culturally significant sites and areas. Other character and heritage items are provided for in Objective HH-O1 and policy HH-P1. The Section 42A report on Historic Heritage will discuss this topic.	No
256.6 ⁵⁵	Chloe Chai and Mark McKitterick	SD-O5	Neutral on SD-O5		Accept	Submission relates to rezoning of San Dona and is covered in the Section 42A hearing report on Rural Zones.	No
284.36	Clampett Investments Limited	SD-O5	Retain SD-O5 as notified		Accept	Agree with submitter	No
316.4 ⁵⁶	ECan	SD-O5	Consider whether to amend SD-O5 to give particular mention to papakāinga housing and marae, as per the Canterbury Regional Policy Statement.		Reject	Policies SPZ(KN)-P1, P2 and P3 enable papakāinga housing and marae to be developed in accordance with tikanga. Papakāinga and marae are provided for under SD-O5(4) and (6).	No
325.5	Kainga Ora	SD-O5	Retain SD-O5 as notified		Accept	Agree with submitter	No
326.37	Rolleston Industrial Developments Limited	SD-O5	Retain SD-O5 as notified		Accept	Agree with submitter	No
414.54	Federated Farmers	SD-O5	Amend SD-O5: "... 2. the values of identified sites and areas of significance to Ngāi Tūāhuriri are <u>can be</u> protected; 3. Ngāi Tūāhuriri can retain <u>where it exists</u> , and <u>may</u> enhance access to sites of cultural significance;..."		Reject	The wording reflects policy 13.3.1 of the RPS.	No
418.6	Keith Godwin	SD-O5	Neutral on SD-O5		N/A	Submission relates to rezoning of San Dona and is covered in the Section 42A report on Rural zones.	No

⁵⁴ DoC FS77 support; ECan FS105 support⁵⁵ M McKitterick FS2 oppose⁵⁶ R & G Spark FS37 oppose

Table B 7: Recommended responses to submissions and further submissions - Objective SDO6

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to Proposed Plan?
111.7	CA and GJ McKeever	SD-O6	Retain SD-O6 as notified		Accept	Agree with submitter	No
162.6	John Stevenson	SD-O6	Retain SD-O6 as notified		Accept	Agree with submitter	No
230.1	Concept Services	SD-O6	Amend SD-O6: "1. Avoiding <u>managing</u> subdivision, use and development where the risk is unacceptable; ..."	3.9	Reject	See the relevant section of the report Council has a role under section 21(1)(b)(i) RMA to control land use for the purpose of avoidance or mitigation of natural hazards. Under section 106(1)(a) RMA a consent authority may refuse a subdivision consent where it considers that there is a significant risk from natural hazards. The present wording reflects policy 11.3.1 of the Canterbury RPS.	No
249.202 ⁵⁷	MainPower New Zealand Limited	SD-O6	Amend SD-O6 by adding a new clause: "..." <u>3. Ensuring important infrastructure is only located within areas of significant natural hazard risk where there is no reasonable alternative and the important infrastructure is designed so as not to exacerbate natural hazard risk to people and property.</u> "	3.9	Reject	See relevant section of the report	No
256.7 ⁵⁸	Chloe Chai and Mark McKitterick	SD-O6	Support SD-O6 as notified		Accept	Agree with submitter	No
284.37	Clampett Investments Limited	SD-O6	Retain SD-O6 as notified		Accept	Agree with submitter	No
295.73	Hort NZ	SD-O6	Retain SD-O6 as notified		Accept	Agree with submitter	No
316.5 ⁵⁹	ECan	SD-O6	Retain SD-O6 as notified		Accept	Agree with submitter	No
325.6	Kainga Ora	SD-O6	Amend SD-O6: "1. <u>Avoiding or minimising</u> subdivision, use and development where the risk is unacceptable;..."	3.9	Reject	See the relevant section of the report Under section 106(1)(a) RMA a consent authority may refuse a subdivision consent where it considers that there is a significant risk from natural hazards. The present wording reflects policy 11.3.1 of the Canterbury RPS.	No
326.38	Rolleston Industrial Developments Limited	SD-O6	Retain SD-O6 as notified		Accept	Agree with submitter	No
414.55	Federated Farmers	SD-O6	Delete 'use' from SD-O6: 1. <u>Avoiding</u> subdivision, use and development where the risk is unacceptable; and mitigating other natural hazard risks. ...	3.9	Reject	The present wording reflects policy 11.3.1 of the Canterbury RPS.	No
418.7	Keith Godwin	SD-O6	Retain SD-O6 as notified		Accept	Agree with submitter	No

⁵⁷ Waka Kotahi FS110 support⁵⁸ M McKitterick FS2 oppose⁵⁹ R & G Spark FS37 oppose

Table B 8: Recommended responses to submissions and further submissions - SD-O2 Variation 1

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to Proposed Plan?
12.2	Heritage NZ	SD-O2	Retain SD-O2 as notified		Accept	Agree with submitter	No
13.1 ⁶⁰	Mike Greer Homes Ltd	SD-O2	<p>Rezone the following properties from Rural Lifestyle Zone to Medium Density Residential Zone:</p> <ul style="list-style-type: none"> - Pt RS 37428 (CB701/7) limited to the land to the west of the Main Trunk Railway Line; - RS 39673; and - Lot 1 DP 19366. <p>Refer to Plan A in full submission for map of area above. Refer to Attachment B for Development Area document, Outline Development Plan, and Planning Assessment.</p> <p>Refer to submission #332 lodged on the Proposed District Plan which contains this rezone request and supporting documentation.</p>	3.11	Reject	See the relevant section of the report	No

⁶⁰ CIAL FS15 oppose

Appendix C. Section 32AA Evaluation

C1. Overview and purpose

This evaluation is undertaken in accordance with section 32AA of the RMA. It examines the appropriateness of the recommended amendments to the objectives and policies for the Strategic Direction following the consideration of submissions received on the Proposed Plan. The Strategic Directions provisions are contained in that chapter but affect the objectives and policies within other chapters across the plan.

This further evaluation should be read in conjunction with Part B Strategic Directions of the Section 32 Report prepared for the development of the Proposed Plan.

C2. Recommended amendments

A range of amendments are recommended to the Strategic Direction chapter as a result of submissions received on the Proposed Plan. The recommended amendments are shown in Appendix A and summarised in the main report.

Change recommend to SD-O1 are to be consistent with the RPS and the general direction given within government documents.

The changes recommended to SD-O2 will better align with the NPSUD.

The changes to SD-O4 and SD-O6 align better with the provisions in the rest of the Proposed Plan and provide clarity as to the overall direction for the district.

C3. Statutory Tests

The District Council must ensure that prior to adopting an objective, policy, rule or other method in a district plan, that the proposed provisions meet the requirements of the RMA through an evaluation of matters outlined in Section 32.

In achieving the purpose of the RMA, the District Council must carry out a further evaluation under section 32AA if changes are made to a proposal as a result of the submissions and hearings process. This evaluation must cover all the matters in sections 32(1)-(4).

Objectives

The objectives are to be examined in relation to the extent to which they are the most appropriate way to achieve the purpose of the RMA.⁶¹ For the purposes of evaluation under section 32AA the following criteria form the basis for assessing the appropriateness of the proposed objectives:

- Relevance;
- Usefulness;
- Reasonableness; and
- Achievability.

⁶¹ RMA s32(1)(a)

Provisions

Each provision is to be examined as to whether it is the most appropriate method for achieving the objectives. For a proposed plan, the provisions are defined as the policies, rules, or other methods that implement, or give effect to, the objectives of the proposed plan.⁶²

The examination must include assessing the efficiency and effectiveness (including costs and benefits of the environmental, economic, social, and cultural effects, quantified if practicable, and the risk of acting or not acting) and a summary of the reasons for deciding the provisions.

C4. Evaluation of Recommended Amendments to Objectives

Objectives SD-O1, SD-O2 and SD-O4 are recommended to be amended as set out in Appendix A: The following tables provide an evaluation of the recommended amendments to the objectives.

Table C 1: Recommended Amendments to Objectives – SD-O1

Relevance	Addresses a relevant resource management issue The amendment better reflects guidance given in central government documents, the proposed National Policy Statement for Indigenous Biodiversity and the provisions of RPS.
	Assists the District Council to undertake its functions under s31 This enables Council to align its functions with the NPSIB and central government direction on indigenous biodiversity. Policy 8 of the Proposed NPSIB requires maintenance of indigenous biodiversity outside of the SNAs and Policy 9.3.6 of the RPS.
	Gives effect to higher level documents The amendment better aligns with Section 6(c) RMA of Protecting areas of significant indigenous biodiversity and the general approach within the Proposed NPSIB and Policy 9.3.6 of the RPS.
Usefulness	Guides decision-making The amendment better guides decision makers as they will have greater flexibility in a determining whether a resource consent application meets the intent of the objective.
	Meets best practice for objectives The amendment clarifies the outcome sort within the Ecosystems and Indigenous Biodiversity Chapter and the Proposed NPSIB.
Reasonableness	Will not impose unjustifiably high costs on the community / parts of the community The amendment will reduce compliance costs associated with achieving the outcome. Council has increased funding available for land owners to help protect SNAs.
	Acceptable level of uncertainty and risk Given that the NPSIB is still proposed, there is a negligible risk that the that Central Government departs from previous guidelines on offsetting the effects of indigenous biodiversity loss.
Achievability	Consistent with identified tāngata whenua and community outcomes

⁶² RMS s32(6)(a)

	The amendment does not affect the identified tāngata whenua and community outcome values within the proposed plan.
	Realistically able to be achieved within the District Council's powers, skills and resources The proposed amendment will better enable Council to assess the effects of activities on indigenous biodiversity.
Conclusion	The recommended amended objectives are the most appropriate way to achieve the purpose of the RMA by providing a coherent package of desired outcomes consistent with sustainable management.

Table C 2: Recommended Amendments to Objectives – SD-O2

Relevance	Addresses a relevant resource management issue The amendment better reflects the intent of the NPSUD by recognising that a well-functioning urban environment and planned urban form align with the amendments to the RMA.
	Assists the District Council to undertake its functions under s31 The amendments better recognise the alignment between the Proposed District Plan and the NPSUD.
	Gives effect to higher level documents The proposed amendment gives effect to the intent of the NPSUD and the MDRS amendments to the RMA.
Usefulness	Guides decision-making The amendment gives effect to the NPSUD and enables decision makers to align decisions on urban development towards a well-functioning urban environment.
	Meets best practice for objectives The proposed amendment aligns with Objective 1 of the NPSUD and the language in the SD-O2 from Variation 1.
Reasonableness	Will not impose unjustifiably high costs on the community / parts of the community There will be no additional costs to the community or parts of the community as a result of the amendment.
	Acceptable level of uncertainty and risk There is no additional uncertainty or risk associated with the recommended amendment.
Achievability	Consistent with identified tāngata whenua and community outcomes The amendment does not affect the consistency of the strategic objective with identified tāngata whenua and community outcomes.
	Realistically able to be achieved within the District Council's powers, skills and resources The Council has the skill base and experience to implement the Proposed District Plan and the amendment aligning with the NPSUD.
Conclusion	The recommended amended objectives are the most appropriate way to achieve the purpose of the RMA by providing a coherent package of desired outcomes consistent with sustainable management.

Table C 3: Recommended Amendments to Objectives – SD-O4

Relevance	Addresses a relevant resource management issue The amendment better aligns with the objectives and policies within the rest of the plan for activities within the rural zones.
	Assists the District Council to undertake its functions under s31 The amendments will better assist the Council in undertaking its functions, including decisions on resource consents for primary production, by clarifying the intended outcome sought by the objective.
	Gives effect to higher level documents The amendment will better give effect to Policy 5.3.2 by enabling primary production as a whole rather than excluding indoor and outdoor intensive farming operations, forestry, and aggregate extraction.
Usefulness	Guides decision-making The amendment will better guide decision makers through linking to the objectives and policies of the rural zones.
	Meets best practice for objectives The amendments to the objective clarify the wording and the outcome sought, and therefore will improve interpretation. The amendments therefore meet best practice.
Reasonableness	Will not impose unjustifiably high costs on the community / parts of the community No additional costs on the community or parts of the community will be generated by the recommended amendment.
	Acceptable level of uncertainty and risk There is no additional uncertainty or risk associated with the recommended amendments.
Achievability	Consistent with identified tāngata whenua and community outcomes The amendments do not affect the consistency of the strategic objective with identified tāngata whenua and community outcomes.
	Realistically able to be achieved within the District Council's powers, skills and resources The amendments will make the implementation of the Proposed District Plan easier and avoid over complicating the assessment of activities within the rural environment.
Conclusion	The recommended amended objectives are the most appropriate way to achieve the purpose of the RMA by providing a coherent package of desired outcomes consistent with sustainable management.

Overall, the recommended amendments proposed to the objectives provide greater clarity of the outcomes sought to be achieved. For the purposes of sections 32 and 32AA, I consider that the revised objectives are the most appropriate way of achieving the purpose of the RMA.

Adequacy of Information and Risk of Acting or Not Acting

Section 32(2)(c) of the RMA requires an assessment of the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.

Submissions have raised a number of matters that need to be addressed to provide clarity to the Strategic Directions provisions of the Proposed Plan. If no action is taken and the Proposed Plan is retained as notified, it could cause confusion and may result in a lack of consistent interpretation of the Proposed Plan.

Submissions also seek to amend the Proposed Plan, so it better achieves the purpose of the RMA. The recommended amendments address this matter assist in making the provisions efficient and effective in achieving the objectives. The risk in not acting is that the provisions do not effectively or efficiently achieve the objectives.

After reviewing the Strategic Directions provisions of the Proposed Plan and considering the submissions on these provisions and matters raised in mediation, I consider there is sufficient information on which to base the recommended revised objectives.

C5. Conclusion

I have evaluated the recommended amendments to objectives to determine the extent to which they are the most appropriate way of achieving the purpose of the RMA where there is necessary, and otherwise to give effect to higher order planning documents. I have also evaluated the recommended amendments to the proposed provisions, including their efficiency and effectiveness of the provisions in achieving the proposed objectives. I consider the proposed objectives as recommended to be amended are an appropriate way of achieving the purpose of the RMA and the recommended changes to provisions are the most appropriate means of achieving the objectives.

Appendix D. Report Author's Qualifications and Experience

I hold the following qualifications: Master of Science (Waikato University). I am an associate member of the New Zealand Planning Institute. I have over 30 years' experience in working as a Planner for local and central government and a consultancy and as an Environmental Scientist.

My work experience includes, amongst other matters:

- Environmental Research Scientist,
- Preparation and processing of regional and district resource consents,
- Author and technical support on various regional and district plans,
- Preparation of Local Government policy, and various sections within an Annual Plan and Long-Term Plan.
- Expert witness in the Environment Court,
- Management Planner, Department of Conservation,

I have been employed by the Waimakariri District Council since November 2019 (3 years and six months) as a Principal Policy Planner within the Development Planning Unit Team.

Appendix E. Canterbury Regional Policy Statement – Map A

Map A - Greenfield Priority Areas and Future Development Areas (viewable in more detail at www.ecan.govt.nz)

