

**BEFORE THE HEARING COMMISSIONERS APPOINTED  
BY THE WAIMAKARIRI DISTRICT COUNCIL**

**IN THE MATTER OF** The Resource Management Act 1991 (**RMA**)

**AND**

**IN THE MATTER OF** Hearing of Submissions and Further  
Submissions on the Proposed Waimakariri  
District Plan (**PWDP** or the **Proposed Plan**)

**AND**

**IN THE MATTER OF** Hearing of Submissions and Further  
Submissions on Variations 1 and 2 to the  
Proposed Waimakariri District Plan

**AND**

**IN THE MATTER OF** Submissions and Further Submissions on the  
Proposed Waimakariri District Plan by **Mike  
Greer Homes NZ Limited**

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**EVIDENCE OF PATRICIA HARTE  
ON BEHALF OF MIKE GREER HOMES NZ LIMITED**

Dated: 3 May 2024

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## INTRODUCTION

1. My name is Patricia Harte. I am a Consultant Planner with Davie Lovell-Smith, Planners, Engineers and Surveyors of Christchurch.
2. I have a Bachelor of Laws (Hons) and Master of Science in Resource Management and am a full Member of the New Zealand Planning Institute.
3. I have thirty years' experience in planning and resource management. Throughout this period, I have been involved in the preparation of seven district plans and numerous plan changes. I have assisted Councils in processing private plan changes and resource consents for large projects. This has included providing evidence at Council level and at extended Environment Court hearings.
4. I have been asked by Balance Development Ltd on behalf of Mike Greer Homes NZ Limited (the **Submitter** or **Mike Greer Homes**) to prepare planning evidence regarding Mike Greer Homes submissions to the proposed Waimakariri District Plan (**pWDP** or **Proposed Plan**) and Variation 1 to the pWDP to rezone of 14.2 ha land at the southern entrance to Kaiapoi (the **Site**) from Rural Lifestyle Zone to Medium Density Residential Zone.
5. I confirm that I have read and am familiar with the Code of Conduct for Expert Witnesses in the Environment Court Consolidated Practice Note (2006). I agree to comply with that Code. Other than where I state that I am relying on the evidence of another person, my evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

## SCOPE OF EVIDENCE

6. In my evidence I address the following issues:
  - (a) Requirements of the District Council to contribute to well-functioning environments and to provide at least sufficient development capacity as specified in the NPS-UD Policies 1 and 2;
  - (b) Assessment of the rezoning request with regard to the NPS-UD, Proposed Waimakariri District Plan and Variation 1 Urban Form and Strategic Directions objectives and policies;
  - (c) Assessment of the resource management effects of the proposed rezoning.

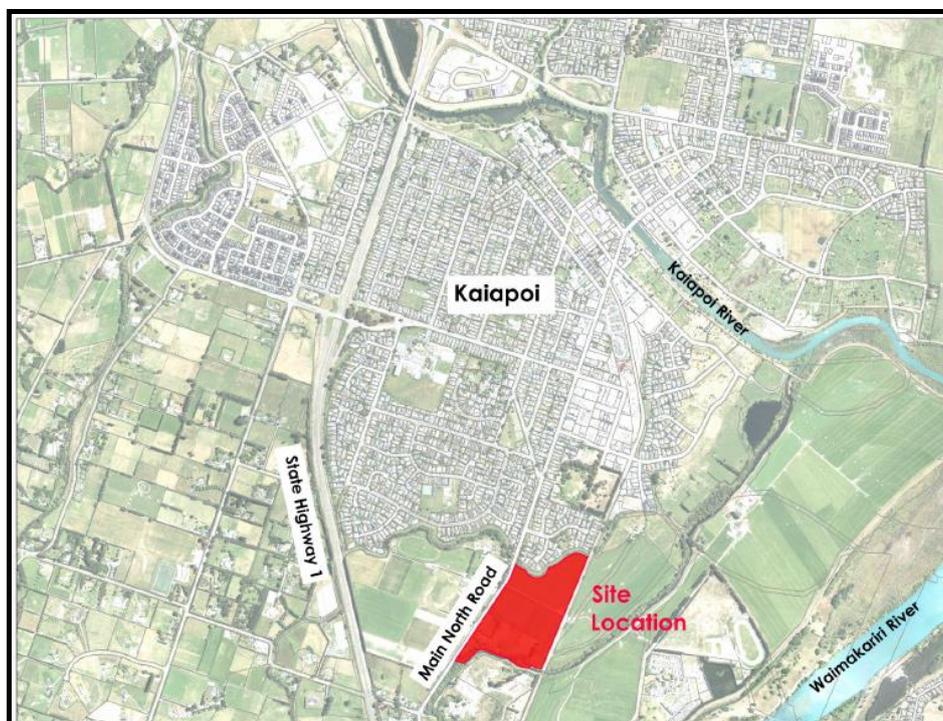
## SUMMARY

7. My planning evidence assesses rezoning the Site from Rural Lifestyle Zone to Medium Density Residential Zone inclusive of amendments to the South Kaiapoi Outline Development Plan proposed by Mike Greer Homes.
8. The Proposal will yield approximately 190 dwellings at a density of 18 dwellings/ha with subdivision and development guided by the proposed ODP and provisions of the pWDP.
9. Mike Greer Homes' submission requests rezoning of land in south Kaiapoi from Rural Lifestyle to Medium Density Residential. They also requested that the site is added as a new Residential Development Area, however they are no longer pursuing this second request.
10. The 14ha submission Site is a logical southern extension of south Kaiapoi and is anticipated to provide for approximately 190 lots.
11. The Site does not fall within any formalised "planning area" identified for growth but is identified in Council's in Council's further development strategy as being a logical growth direction for business activities. In addition its future use is anticipated by the Council's south Kaiapoi Water and Wastewater Structure Plan
12. There are a number of aspects of the 2023 Capacity Assessment prepared for Waimakariri District that overestimate supply including the assumption that the market demands a significant proportion of multi-unit housing and therefore that less land is required. Further, the addition of land for residential development over the longer term has a positive impact on the operation of the land and development market.
13. The Site satisfies Strategic Directions objectives of the Proposed Plan including adjoining Kaiapoi, providing for extensive open space areas and connectivity with surrounding area, connecting to existing services or providing development contributions for extensions of services, and zoning which enables denser development.
14. Accepting the request to rezone the Site is fully in accord with the objectives and policies of the NPS-UD and is largely aligned with the Canterbury Regional Policy Statement

## THE PROPOSAL

15. Mike Greer Homes NZ Limited and Dave and Des Winter (owners of the land south of the Kaikainui Stream in south Kaiapoi) investigated possible residential development of the Site land in early 2021 in response to the central government initiative by Kainga Ora Infrastructure Acceleration Fund. The land in question is listed below and identified in Figure 1 below:

- (a) Pt RS 37428 (CB701/7) limited to the land west of the Main Trunk Railway line
- RS 39673
  - Lot 1 DP 19366

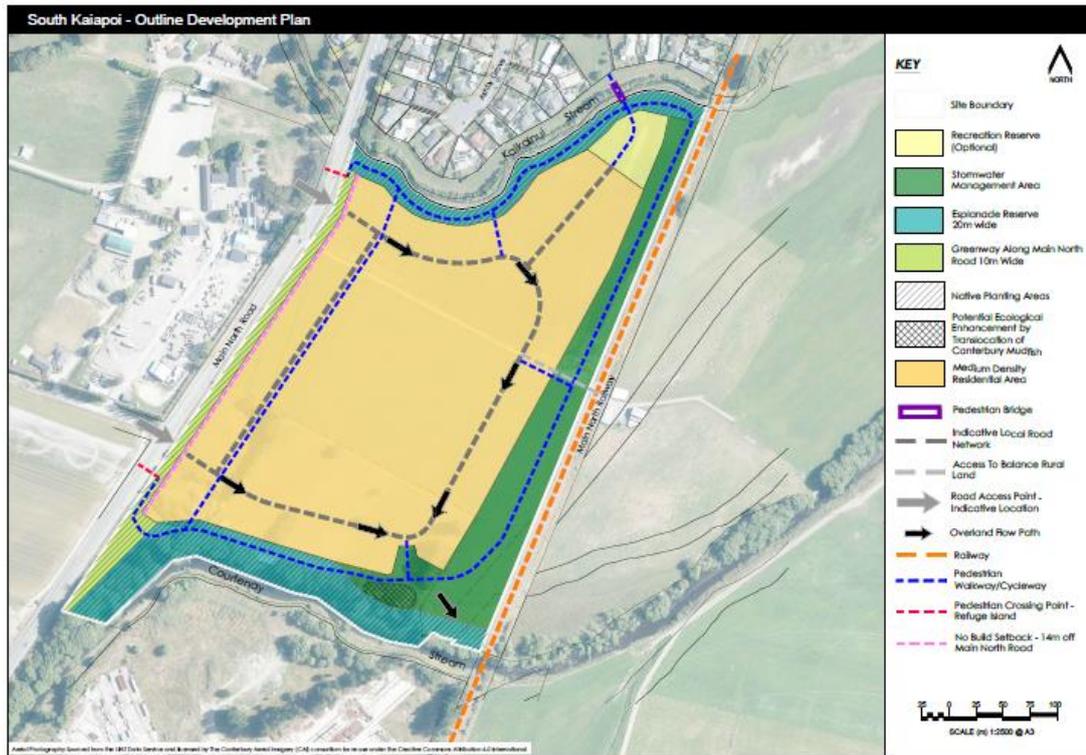


**Figure 1- Site location**

16. In response to the notification of the Proposed Waimakariri District Plan they considered the possible rezoning of this land to enable future residential development. Following this consideration Mike Greer Homes. lodged a submission to the Proposed Plan relating to the land listed above requesting that it:

- (a) Be rezoned from Rural Lifestyle Zone to Medium Density Residential Zone, and
- (b) Be added as a new Residential Development Area (SK-South Kaiapoi Residential Development Area)

17. The Proposed Plan was followed by Variation 1 to incorporate the requirements of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Enabling Act). The submitters then lodged a submission confirming and requesting that their land (as listed above and in Figure 1) be rezoned Medium Density Residential Zone as provided for in the Enabling Act.
18. The current owners of this land, Des and David Winter, have also made a submission requesting rezoning of this land for residential purposes, but also requesting that remainder of Pt RS 37428 (CB701/7) which lies to the east of the railway line is rezoned Residential. This evidence only addresses the rezoning submission of Mike Greer Homes.
19. The submission on the Proposed Plan contains a full package of provisions to fulfil the role of a Residential Development Area including an objective and two policies and listed land use and subdivision rules. These rules largely require development in accordance with Medium Density Residential zone provisions, however a certification process is required to enable development to proceed. Due to this additional and yet-to be-tried process of certification the submitter has chosen to concentrate on the second aspect of their submission, namely, to have their land zoned Medium Density Residential.
20. An Outline Development Plan was prepared for the site and included in the submissions to the Proposed Plan and Variation 1. This ODP has been modified since lodging of the submissions to the Proposed Plan and Variation 1 in response to more detailed assessments of the urban design potential of the site. The revised ODP (Figure 2) can be seen below.



**Figure 2 - South Kaiapoi Outline Development Plan (SK-ODP)**

21. The key features of the revised "South Kaiapoi Outline Development Plan (SK-ODP) are:
- That 14.2ha of land (comprising 3 properties) on the southern edge of Kaiapoi be rezoned from Rural Lifestyle to Medium Density Residential.
  - The Site adjoins Kaikainui Stream on its northern boundary and Courtenay Stream on southern boundary creating esplanade reserve areas which will provide public space for walking and cycling as well as habitat.
  - An internal collector road, with 2 external road connections and cycle/pedestrian routes around the perimeter of the site.
  - Esplanade reserves adjoining Kaikainui and Courtney Streams and a recreation reserve in northwest corner with an associated footbridge over Kaikainui Stream across to neighbourhood reserve on Holland Drive
  - A significant area of the site adjoining the railway line is set aside for stormwater detention and treatment given its low profile on this site.

- (f) Frontage treatment onto Main North Road in the form of recreation reserves in keeping with the site being part of the southern "entrance" to Kaiapoi.
- (g) Two proposed pedestrian crossing-refuge islands on Main North Road.
- (h) A potential enhancement of an area to enable endangered Canterbury Mudfish to this site. The proposed rezoning to Medium Density Residential Zone (**MRZ**) and the revised ODP (**ODP**) are together referred to as the **Proposal** in my evidence.

## **THE SITE AND LOCALITY**

- 22. The Site is approximately 14ha in area comprising the northern section of 10ha bordering on the Kaikainui Stream and the southern title of 4.6ha bordering on the Courtenay Stream. The eastern boundary of the site is the Main Trunk Railway Line and the western boundary is Main North Road. The Site is currently part of the farming operation of Des and David Winter generally involving pastoral farming with some cropping. There are no buildings on the site other than the residence on the southern title.
- 23. The adjoining land uses are:
  - (a) Farming of the remaining (eastern) site of the Winter farm on the eastern side of the railway line.
  - (b) Further east is the Riverlands Holiday Park and Woodford Glen on the south is land that appears to be associated with a drilling company and to the west is Main North Road which is Doubledays Road
  - (c) The Kaikainui Stream on the northern boundary adjoining the southern extent of Kaiapoi's residential areas.
  - (d) To the east of Main North Road which is one of the main routes from the south. To the west of Main North Road is farmland and some businesses including a building company and Easylawn.
- 24. The Site does not currently fall within any formalised "planning" area identified for the residential growth of Kaiapoi. For example, it is not part of a Development Area notified in the pWDP or identified as a Greenfield Development Area or Future Development Area on Map A of the CRPS.

25. However the general area south of Kaiainui Stream is identified in the Council's future development strategy entitled "*Our District, Our Future, Waimakariri 2048 District Development Strategy Waimakariri 2018*" as being a logical growth direction for business activities – see below in Figure 3 The yellow arrow identifies the site.



Figure 3 – Kaiapoi

26. The South Kaiapoi Water and Wastewater Structure Plan was prepared to develop a better understanding of likely infrastructure needs for future development of what is referred to as the "South Kaiapoi Growth Area". The Site and land further to the south fall within this Growth Area. The associated investigation generally concluded that servicing of these areas was feasible.
27. The Site is therefore a logical extension of the south eastern residential area of Kaiapoi.

## **MERITS OF THE PROPOSAL – ASSESSMENT OF EFFECTS**

28. The matters for consideration relate to the development and operation of the site and associated effects of which are addressed in specialist evidence. The resource management issues addressed by this evidence are:

- (a) Residential land supply
- (b) Flood management
- (c) Servicing
- (d) Transportation
- (e) Soil contamination
- (f) Geotechnical matters
- (g) Noise
- (h) Neighbour impacts and Reverse sensitivity
- (i) Visual amenity and landscape character
- (j) Urban design
- (k) Value of land for farming
- (l) Ecological values

### **Residential land supply**

29. Fraser Colegrave, an economist with particular experience of housing supply and demand in greater Christchurch, has prepared evidence relating to the proposed rezoning of the submitters South Kaiapoi site. He has based his assessment on an indicative layout plan which provides for 195 lots ranging from 235m<sup>2</sup> to 660m<sup>2</sup> with an average of 365m<sup>2</sup>. He makes the following observations and conclusions:

- (a) *Waimak housing offers better value for money than Christchurch City. While median house prices have historically been similar, homes in Waimak are considerably larger, on average.*

*Consequently, the tide of post-quake relocations from red zoned areas of the city, including into Waimak and Selwyn, has been sustained into the long term.*

- (b) *Second, the Covid-19 pandemic has caused people to reconsider what they really need and want from life, including where they want to live. With the rapid uptake of working from home and the newly emerging "hybrid working model" taking hold, many people are now even more willing to trade off proximity to the city in exchange for living in areas that better meet their day-to-day needs.*
- (c) *With both trends (a and b) likely to continue well into the foreseeable future, significant additional capacity will be required to keep pace with growth in housing demand.*
- (d) *Currently, there is little greenfield land available for development, with the consented stages of Beachgrove the only significant undeveloped land left in Kaiapoi. As at late 2023, Stages 1-4 had been developed and Stages 5 and 6 were selling. Along with future stages, these will provide around 300 further lots to be developed, after which there will be no more greenfield land to accommodate ongoing growth in demand for living in Kaiapoi.*
- (e) ***Accordingly, new urban areas like the submitters site in South Kaiapoi need to be enabled as soon as possible to keep pace with demand for new dwellings well into the long term. (My emphasis)***

30. With regard to the recent 2023 capacity assessment prepared for the Waimakariri District Council, Mr Colegrave is of the opinion that there are a number of aspects which overestimate supply. In particular there is no distinction between housing types when in fact there are different demands for housing types. He notes for example, that the average dwelling in Kaiapoi currently has 175m<sup>2</sup> of floorspace on a 690m<sup>2</sup> section, with an average of 3.3 bedrooms which is likely to exceed the requirements of many future households. In my opinion to satisfy Policy 1 of the NPS-UD which requires "*a variety of homes that meet needs in terms of type, price, location and of different households*" a range of smaller dwellings is needed to increase choice and promote affordability for people wishing to live in Kaiapoi.

31. The new Housing Capacity Assessment (**HCA**) was prepared to reflect new plan-enabled capacity associated with new Medium Density Residential Standards (MDRS). As noted by Mr Colgrave unsurprisingly, "*the 2023 HCA identified even greater capacity to meet demand than the 2021 version, mostly due to higher density options enabled by the MDRS and the NPS-UD.*" However

the assessment did not test whether there are sufficient land/sites for different dwelling types in locations, including potentially new locations. In Mr Colegrave's opinion this approach "*invariably masks a material shortfall for stand-alone dwellings in new urban areas, which are consistently in high demand*".

32. I agree with Mr Colegrave that medium density typologies like duplexes and terrace houses are increasingly important pieces of the future housing puzzle, at least nationally, but there is currently limited demand for them in the Rangiora District. This opinion is supported by building consent data which I understand shows that 92% of homes in the last 10 years are standalone homes. Therefore, in my opinion, it would be unwise to provide for growth of housing in Kaiapoi based only on the 2023 Housing Capacity Assessment which appears to assume a significant proportion of new housing being multi-unit housing and therefore requiring less land. To do so would appear to overestimate the land available for new housing.
33. I also agree with Mr Colegrave that while the MDRS may have provided unparalleled boosts in plan-enabled capacity, much of this is theoretical and fails to acknowledge and meet local housing needs and preferences which are predominantly for standalone homes. Reliance on the plan-enabled approach is therefore very likely to provide insufficient land for residential development over time resulting in higher prices and consequential difficulties and hardship for people buying or renting.
34. The current Review of the Waimakariri District Plan under the RMA provides a logical and appropriate opportunity for consideration of, and provision for, the growth needs for all sectors of the community and District. As part of the review of the current District Plan capacity assessments of the likely demand and supply of land for housing were obtained and included in Urban Form and Development **Objective 1 Feasible development capacity for residential activities**. I assume that in some manner the Housing bottom lines in this Objective determined the extent of new zoning in the Proposed Plan. However it appears that most of the rezoning was of land that had already been identified in Map A of the Canterbury Regional Policy Statement. In my opinion the hearing and deciding of submissions seeking residential zoning should be undertaken with an open mind and with the real-world knowledge that rezoning of land that is not immediately required for development has no negative impacts on the environment or on the competitive operation of the land and development market.
35. Finally I note that Mr Colegrave concludes that "*recent reporting for the district, including the 2023 HCA, suggest that sufficient capacity is already being provided. However, as noted above,*

*these conclusions are based on out-of-date cost data and unsubstantiated assumptions that limit their reliability. Consequently, I do not believe the district has enough capacity to meet demand, with a lot more needed".*

36. He therefore considers that in relation to the Mike Greer Home's South Kaiapoi site "*The proposal helps to plug this looming gap in feasible capacity by providing quality, master-planned housing that is in step with market demand and able to be realised at both pace and scale.*

## **Flooding**

37. DHI have been involved in all the recent flood modelling of Kaiapoi undertaken for the PWDP and which is portrayed on the Planning Maps. The submitter requested Gregory White of DHI to undertake a detailed assessment of the flood risk of the site. This has involved a series of modelled flood events resulting from a breakout of the South Ashley River based on a 0.5% flood event. This flood event equates with a 1 in 200 year flood, which is the flooding standard used in the Proposed Waimakariri District Plan. He has prepared evidence describing this modelling, its impact on the site and the effectiveness of the proposed mitigation.
38. In response to this site-specific modelling MGH intend to raise the site to a level which ensures the land can be used for housing and new buildings as they will be above 0.5% flood event including a 500mm freeboard for new buildings. This provides a permanent response and one which will only involve cost for the developer. The modelled resulting flood levels in a 0.5% flood event are expected predominantly to be 0.1 to 0.5m with a maximum of 0.8m. The 0.8m deep areas are localised to small areas within the roading network. There will generally be a decrease in flood levels on surrounding properties, however the flooding will increase by 0.065m along Main North Road shown in orange in Figure 5 of Mr Whyte's evidence.
39. Jamie Verstappen's earthworks and infrastructure evidence also addresses matters relating to the potential flooding of the site. He confirms that the Council's flood mapping showing low to medium risk areas are generally suitable for new lots. With regard to the high risk along the Kaikainui and Courtney Streams on the northern and southern boundaries of the site and the low lying eastern portion, these areas are intended to be used as a stormwater treatment and detention area and/or recreation/esplanade reserves.
40. Mr Verstappen confirms that filling of the site to a depth of 1m is needed to ensure building platforms area above the 200 year level which will ensure minimum floor levels required by the pWDP are achieved.

41. The pWDP approach to flood hazard management seeks that that new subdivision and development with the existing urban environment is managed to ensure any increased risk to people is " low". There is no specification as to what constitutes low in relation to flooding return periods whereas for areas outside the urban environment people and property natural hazard risk is to be avoided or mitigated. However, Natural Hazard policy 2(NH-P2) for subdivision and development which relates to activities in **high flood hazard** area requires that development is managed to ensure that minimum floor levels are adopted to ensure the risk of life and potential damage to buildings from flooding are mitigated. High flood hazard is defined in the pWDP as relating to a 0.2% annual exceed probability with equates to a 1 in 500 year flood. On this basis the proposed development with its mitigation measures based on the lesser flood of 1 in 200 year flood (0.5%) will satisfy NH-P2.
42. The other relevant provision is Natural hazard Objective 3 Natural hazard mitigation which seeks that:
- (a) *Adverse effects on people, property, infrastructure and the environment resulting from methods used to manage natural hazards are avoided or, where avoidance is not possible, mitigated.*
  - (b) The mitigation proposed to limit flooding impacts on the site have been designed to limit any off-site effects. The only displacement effect appears to be along Main North Road in major floods, however I understand that the volume of flood water involved is such that compensatory works on site are possible to reduce this impact.

### **Servicing**

43. The evidence of Mr Verstappen explains the various services can be provided in a manner that does not impact on neighbouring land or on Council's assets. Stormwater is to be provided for and managed on site including treatment and flow attenuation and utilizing existing flood prone areas. It will therefore have no off-site effects. Council's preferred wastewater servicing plan for the site involves a gravity sewer network discharging to the existing sewer network requiring upgrades to the current pressure network. If there is insufficient capacity to accommodate this proposal, upgrades can be undertaken using development contribution funding. With regard to water supply there are two points of connection to the existing network and a headworks upgrade to provide an additional 70 l/s. This headworks upgrade is underway.

## **Transportation**

44. Matthew Collins report concludes that the site is well served by public transport to connect Kaiapoi to Rangiora, Christchurch, Woodend, Pegasus and Waikuku. It also has excellent access to local and strategic roading. The layout proposed in the amended ODP does not raise any issues with regard to transportation, with the proposed two site accesses located a sufficient distance apart to meet required standards. The site is anticipated to be permeable for residents and visitors with the detail of the internal walking and cycling network being determined by subsequent subdivision consents. This is expected to include the future provision of pedestrian or cycle infrastructure on the eastern side of MNR. Overall it is not expected that the traffic related impacts of the development of the site will be adverse in the immediate area.

## **Soil contamination**

45. The report of Davis Robotham states that the site is not identified on the LLUR for hazardous activities. His site inspection indicated that there are a number of discrete activities and potential HAIL activities, however these are able to appropriately managed and therefore should not preclude rezoning of the site to Medium Density Residential.

## **Geotechnical**

46. Neil Charters geotechnical evidence notes that the site has been used primarily for agriculture along with a dwelling. A large area of the site is consistent with medium liquefaction vulnerability (TC2) and two areas are TC3. The two geohazards identified for the site are surface deformation due to liquefaction and long-term consolidation settlement of certain materials across the site. These hazards are able to be mitigated through earthworks and ground improvement and therefore should not preclude the site being rezoned for residential purposes.

## **Noise**

47. William Reeve's evidence assesses and comments on potential noise impacts on future residents of the site. The site is potentially impacted by three main noise sources, namely aircraft noise, road traffic noise and rail noise. The site is under the operative 50dBA Ldn aircraft noise contour, as is most of Kaiapoi. Aircraft noise impacts and associated plan provisions are being addressed in a separate hearing (Stream 10A (airport noise issues)). I prepared evidence for that hearing for Mike Greer Homes and Momentum Land Limited, and I stand by the views expressed in that

evidence. In the circumstances noise it is not addressed in this evidence except in relation to cumulative noise issues.

48. Mr Reeve has calculated noise levels that area expected to be experienced on the site from Main North Road and the Main North Railway. He has used the Proposed District Plan noise standards and forms of measurement as a guide in addition to the more recent approach developed through expert conferencing. In relation to road and rail noise he considers that the sound insulation rule will control internal noise levels within the future houses on the site to an appropriate level. This approach involves specific levels insulation for some houses closer to the noise sources and is similar to the current Plan requirements. The design of the subdivision required by the ODP means that houses do not adjoining the road or railway so the insulation requirements will not require unusual construction approaches. There are no standards for outdoor noise.
49. There is also potential for vibration impacts from trains which will vary across the site. There are standards that can be used to determine an appropriate response to nuisance vibration however Mr Reeve concludes that the levels of vibration experiences are unlikely to be unusually high, but this does not mean that vibration from trains will not be noticed by residents.

#### **Neighbour impacts and reverse sensitivity**

50. Mr Reeve also considers possible cumulative impacts from the various noise sources. In his opinion the site layout and location relative to noise sources will limit these effects. In this regard he advises that houses closest to noise sources will likely have increased insulation thereby reducing noise levels to an acceptable level. Houses further away will then be screened by the closer house as well as being more distance from the road or rail noise and will therefore receive a lower/acceptable level of noise.
51. The issue of neighbour impacts and reverse sensitivity is raised in the evidence of Geoffrey Dunham, a farm management consultant. He notes that land use to the north, east, south and west of the site involves residential housing, pastoral farming and a mix of light industrial and rural uses. The potential impact of noise and dust pollution and spray drift on neighbours largely occurs on the northern housing creating potential for complaints. In reverse, there is potential dog harassment of livestock and disease transfer as well as theft and vandalism all of which impact on the operations and viability of the farming enterprise. As a consequence of these and other challenges farming this site has become a very marginal operation and with the likelihood these

challenges will only increase. In my opinion a change of landuse to residential will be more appropriate than its current farming use.

52. I note that with regard to the remaining farming land on the east side of the railway line, this will become even more isolated. The owners of this land have submitted on the PWDP requesting that it, in addition to the land on the west side of the railway line (the site), be rezoned for residential use.

### **Visual amenity and landscape character**

53. The landscape evidence of Rory Langbridge and the urban design Virkamjit Singh describe the site and its surroundings in detail and assess the site's current values and the anticipated change in landscape and visual amenity with its rezoning to Medium Density Residential. Mr Langbridge considers the natural character of the site to be low due extensive buildings and limited level of cropping. In addition the site lacks openness normally associated with rural land due to the two rivers and associated riparian vegetation enclosing the land. He rates the rural character of the location as moderate-low.
54. The receiving environment of the site to the west includes the Main North Road and builder's yard and a small area of paddocks for growing ready-lawn. To the north is the Kaikainui Stream and with a residential enclave along its northern bank. The Main North Railway line is the eastern boundary with the eastern half of the Winter brothers farm and to the south is Courtenay Stream with a drilling company operation. There is therefore a range of neighbouring activities, all of which do not immediately adjoin the site. Mr Langbridge describes the surrounding features as creating a setting with a unique character with a good level of intimacy.
55. A key feature of the rezoning is the associated South Kaiapoi-Outline Development Plan which creates the setting for future residential development. The ODP draws on the enclosed character of the site by providing a series of reserves around the perimeter. These include esplanade reserves along Kaikainui and Courtenay Streams, and 10m greenway along Main North Road and an extensive stormwater management area along the western boundary. The combination of these areas provides for pedestrian walkways and cycleways around the full perimeter of the site which can be accessed by residents and visitors. The width of these reserves enables a wide range of character areas to be formed including extensive indigenous planting. This includes the potential for the creation of an ecological enhancement area that could provide habitat for translocated Canterbury mudfish. An additional feature of the ODP is the inclusion of a footbridge over the Kaikainui Stream linking the site through to the residential area to the north.

56. Mr Singh considers that the “landscape edge treatments associated with the existing streams and provision of green spaces throughout and around the boundary of the site will create a unique character that can be supported in urban design terms”. Mr Langbridge considers the primary impact of the development will be the loss of low-to moderate rural qualities which will be replaced by a significant increase in housing density, a green amenity and recreational framework that complements and extends the existing green network.

### **Ecological values**

57. Lydia Metcalf has assessed the ecological character of the site and supports the earmarking of a small area within the stormwater management areas for ecological enhancement and the use of indigenous riparian planting in the esplanade reserves along the Courtenay and Kaikainui Streams. She notes that the southern part of the stormwater management areas includes a tall fescue-rautahi wetland as well as a ripgut brome grassland and rye grassland. She supports the inclusion of these wetland habitats with the reserve in order for them to be protected from development and vegetation clearance. Ms Metcalf notes that not all of the wetland is included in the ecological enhancement area but notes that there is potential for this to occur in the future. She also supports the use of indigenous plants in the esplanade reserves along the boundaries of the Courtney and Kaikainui streams both as riparian planting and as a buffer to filter and limit unwanted runoff and contaminants. They will also provide additional habitat for birds over time.
58. There are areas within the site that are potential lizard habitat, however as noted this will not necessarily impede development as there is now recognised process of undertaking surveys and if lizards are present they can be relocated. An area has also been identified as a possible site for translocation of Canterbury Mudfish. While the submitters are supportive of this, there are a range of factors that would need be considered prior to this occurring as detailed in Ms Metcalf's evidence.

### **Urban Design**

59. Mr Singh concludes, and I agree, that the site is located such that it can achieve a coordinated pattern of development with the existing residential development of south Kaiapoi. Its form provides for integrated connections and green spaces able to be used by existing and new residents. As noted previously the site is well located with public and active modes of transport. This location therefore provides for ready accessibility to jobs, health and community services. The proposed Outline Development Plan for the site provides a coordinated landscape approach

with esplanade reserves and a stormwater management area and a planted margin along Main North Road. The MDR zoning will enable more intensive use of the land with a variety of housing typologies than has occurred in the past in Kaiapoi, thereby providing housing choice.

### **Value of land for farming use**

60. The evidence of Mr Dunham assesses in detail the various challenges faced by the current owners of the site in maintaining their farming operations. These challenges include:

- (a) Types of farming are limited by wet soils over winter and early spring and by soil moisture deficits in summer. These conditions exclude horticulture, intensive arable crops in summer and heavy livestock and machinery use in winter.
- (b) Access to the site by contractors is constrained.
- (c) There is no potential for irrigation on this site
- (d) The farming operation generally only breaks even or makes a loss

Consequently there are no long-term viable land use options for this site.

### **Effects conclusion**

61. The above assessment of potential adverse effects of residential rezoning of this South Kaiapoi is drawn from a wide range of specialists. These assessments conclude that the site is well-suited to provide for the anticipated demand for new housing in Kaiapoi and in particular:

- (a) The outline development plan provides for a range of densities with an overall density of 18hh/ha as well as extensive reserve areas for residents and general use
- (b) The site has its own discrete character lying between tree-lined streams as well as providing an attractive entry to Kaiapoi from the south.
- (c) While noise will be experienced from Main North Road, the railway and aircraft these levels are within accepted standards
- (d) Filling of the site will reduce the potential flooding of the site

- (e) Servicing is either currently available or can be provided with partial funding by way of development contributions
- (f) There site is free from constraints (other than flooding) and has no areas of specific ecological values.

## **STATUTORY ASSESSMENT OF THE PROPOSAL**

- 62. The following assesses the proposed rezoning in relation to relevant resource management statutory and policy requirements.
- 63. Key planning policy documents relevant to consideration of the requested rezoning are the National Policy Statement on Urban Development (**NPS-UD**), the Canterbury Regional Policy Statement (**CRPS**) and the Proposed Waimakariri District Plan (pWDP) and Variation 1 (**Variation 1**) to that Plan.
- 64. I note that section 74 of the RMA requires that the pWDP is to be prepared in accordance with relevant national policy statements and the CRPS, and with regard to any other management plans and strategies prepared under other Acts.

### **National Policy Statement for Urban Development 2020**

- 65. The most relevant national policy statement is the National Policy Statement on Urban Development 2020. This NPS has a number of significant objectives, the most relevant of which is:
  - Objective 2:** Planning decisions improve housing affordability by supporting competitive land and development markets.*
- 66. This objective requires councils to acknowledge and address the affordability issue, which is causing significant economic and personal stress for many households, through planning decisions. From my working relationship with developers I am aware that is also of great concern to them. While they might, at times, be getting increased prices for individual sections due to running out of residentially zoned land, they would much prefer a situation where they can supply sections and houses to meet demand.
- 67. As addressed earlier, the Economic assessment undertaken by Fraser Colegrave of Insight Economics analyses the current and predicted future market forces operating in the housing

market and in particular the housing market in Kaiapoi. These markets have been reacting in a classic way with section prices rising in direct response to limited supply of sections. The Mr Colegrave's assessment indicates that there is real potential for there to be under-supply of residential land in Kaiapoi if additional land is not zoned. He also states that the 2023 HCA has over-estimated supply due in part to the assumption that multi-unit residential development will be a significant component of new housing in Kaiapoi, despite data which shows a clear public preference for standalone homes.

68. Also of significance are NPS-UD Objectives 3 and 6, set out below.

**Objective 3:** *Regional policy statements and district plans enable more people to live in, and more businesses and community services to locate in, areas of urban environment in which one or more of the following apply:*

- a) *The area is in or near a centre zone other area with many employment opportunities*
- b) *The area is well-serviced by existing or planned public transport*
- c) *There is a high demand for housing or business land in the area relative to other areas within the urban environment*

**Objective 6:** *Local authority decisions on urban development that affect urban environments are:*

- d) *Integrated with infrastructure planning and funding decisions; and*
- e) *Strategic over the medium term and long term;*
- f) *Responsive, particularly in relation to proposal that would supply significant development capacity*

69. **Objective 3** makes specific reference to a high demand for housing in an area relative to other areas within the urban environment. I understand this is the case with Kaiapoi where due to factors such as land type and land being rezoned promptly after the earthquakes many sections became available at affordable prices, and importantly, prices were lower than elsewhere in the Greater Christchurch Area. This has largely remained the case since that time and resulted in a high level of demand for sections and houses in Kaiapoi.

70. The evidence of Mr Colegrave through analysis of residential land sales and building consent statistics and other sources, concludes that the demand for housing Kaiapoi in recent years has outstripped the neighbouring Christchurch City. From this I consider that Kaiapoi is a special case as referred to in Objective 3I. Accordingly it is my opinion that the decision on requested rezoning of this South Kaiapoi block should be based on "*enabling more people to live in*" Kaiapoi. I also

note that Kaiapoi has a town centre and a significant area of industrial, commercial, educational and community services thereby providing employment opportunities. This satisfies point (a) in Objective 3.

71. **Objective 6** is also very relevant to consideration of this submission request and a number of other submissions as it sets down the basis for making decisions on urban development. The first requirement is that urban development decisions need to be integrated with decisions on infrastructure planning and funding. The evidence of Jamie Verstappen explains that all required services are either available or can be extended to the site. Discussions have been held with the Council regarding development contributions to enable extensions of existing reticulation and, if required, creation of additional capacity for the Councils sewerage treatment ponds.
72. Given the critical and statutory importance of the NPS-UD with regard to providing for growth of urban areas, I now address two key requirements of the NPS-UD contained in Policies 1 and 2 which Council must meet in its decisions on rezoning requests. Key aspects of these NPS Policies are paraphrased below.

***Policy 1: All policy decisions are to contribute to well-functioning urban environments which as a minimum have or enable a variety of homes that meet the need in terms of price, type and location***

***Policy 2: Tier 1, 2 and 3 authorities, at all times provide at least sufficient development capacity to meet expected demand for housing....over the short, medium and long term.***

73. The Mike Greer Homes Submission contains assessment of the proposed rezoning NPS-UD is Policy 1 – Planning decisions, Policy 2 – Sufficient Development Capacity and Policy 8 Responsiveness to plan changes. I provide below a summary of the main conclusions of this analysis.

**Policy 1** is very similar to ***UFD-P2 Identification/location of new Residential Development Areas*** in the Proposed Plan requiring "*planning decisions to contribute to well-functioning urban environments*" which are defined to include as a minimum:

- A variety of homes that meet the needs of different households in terms of type , price and location.
- Good accessibility for all people between housing, jobs, community services, natural spaces and open spaces, including by way of public or active transport

- Support the competitive development and housing markets
- Support reductions in greenhouse gas emissions, and are
- Resilient to the likely current and future effects of climate change

74. In my opinion these criteria are met. Specifically:

- The MDR zoning provide for a range of housing types and densities and the submitters plan to provide for this variety in their development.
- The location of the submitter's land will enable easy access to jobs, community services and open space and routes for public and active transport. This includes ready access to a range of open space areas within the development itself.
- The scale of this development is anticipated to create real opportunities and choices for people seeking housing and therefore to support a competitive housing environment in Kaiapoi and greater Christchurch.
- There is some potential for reduced greenhouse emission through a compact urban form. The site is relatively close to some community facilities and schools and is already well serviced by public transport services within Kaiapoi and between Kaiapoi, Rangiora and Christchurch City the bus stop being with a 1-2minute walk to the site accesses. In addition there is ready access to park and ride facilities.
- With regard to climate change the site is to be raised to avoid more extreme flooding than is required under the Proposed District Plan with the goal providing for long term resilience.

75. **Policy 2** requires "*at least sufficient capacity to meet expected demand for housing and business*" land. Earlier in my evidence I discussed the evidence of Mr Colegrave and noted his conclusion that the current housing capacity assessments are very likely to have over-estimated the supply of land based on assumptions that multi-unit housing will predominate whereas there is a consistent high demand for standalone houses. To satisfy this policy it is therefore necessary for more land to be zoned for housing in Kaiapoi.

76. **Policy 8 – Responsiveness to plan changes**

This policy requires decisions of local authorities relating to urban environments to be responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments even if the development capacity is not

anticipated by RMA documents. While this policy refers to plan changes, I consider it logically applies to submissions to proposed district plans as they both involving changing of district plans. In my opinion the South Kaiapoi site containing approximately 195 sections will add significantly to the development capacity of the southern end of Kaiapoi and will contribute to the well-functioning urban environment of the town as detailed above in paragraph 48. This opinion is supported by the economic evidence of Fraser Colegrave. Council's decision on the submitter's requests should therefore be "responsive". The RMA documents that do "not anticipate" the requested rezoning of this South Kaiapoi block are the Proposed Waimakariri District Plan zoning maps (as opposed to their objectives and policies) and Policy 6.3.1 of the Canterbury Regional Policy Statement which I address later in this evidence.

### **National Policy Statement for Highly Productive Land**

77. The pWDP was notified prior to the National Policy Statement for Highly Productive Land (**NPS-HPL**) which came into effect on 17 October 2022. It is my understanding therefore that as the pWDP proposed zoning for the South Kaiapoi site is Rural Lifestyle then the site is deemed not to be highly productive land.

### **Canterbury Regional Policy Statement**

78. The Mike Greer Homes Submission contains an assessment of the relevant objectives and policies in the CRPS. In summary the proposed rezoning is fully in accord with the requirements contained in Chapter 5 – Land use and Infrastructure, Objectives 5.2.1 Location, design and function of development and 5.3.7 Strategic land network and arterial roads. The criteria in these provisions are very similar to those in the pWDP which I address later in this evidence.
79. Chapter 6 of the CRPS was added to the CRPS in 2013 and is focused on responding to the anticipated demand for business and residential activities which need to be replaced or relocated as a result of the earthquakes. This recovery has largely occurred in relation to the provision and uptake of identified (and now zoned) land for business and residential activities impacted by the earthquakes. This provision for anticipated demand was in the form of identifying Greenfield Priority Areas (**GPA**) and, more recently, Future Development Areas (**FDA**) on Map A in the CRPS and specifying in Policy 6.3.1 (Development within the Greater Christchurch area) that these are the **only areas** where new greenfield development can occur.

80. There have been two major changes in the planning environment since the Map A approach was included in the CRPS. Firstly, there has been, and continues to be, a strong and ongoing demand for housing, particularly in Kaiapoi where lower cost housing has been available. We are now in a period of growth that is not earthquake related so the relevance of some of the Chapter 6 policies, in my opinion, is diminished. Secondly, the National Policy Statement on Urban Development came into effect to overcome many of the issues associated with lack of supply of land for residential and business use and the out of date policy environment contained in various RMA documents. To do this the NPS-UD, and in particular Policy 8, directs local authorities to be "responsive" in their "decisions affecting urban environments" that would "add significantly to development capacity and contribute to well-functioning environments" regardless of whether this capacity is anticipated by existing RMA planning documents. In my opinion the decision to be made on the requested zoning of Mike Greer Homes falls exactly into this category and should therefore be responsive and positive.

81. In my opinion there are a number of policies within the CRPS which indicate that urban development is not limited to Map A areas. Firstly, CRPS **Objective 6.2.2** Urban Form and Settlement states:

*The urban form and settlement pattern in Greater Christchurch is managed to provide sufficient land for rebuilding and recovery need and set a foundation for future growth, with an urban form that achieves consolidation and intensification of urban areas, avoids unplanned expansion of urban areas by:*

1. *aiming to achieve the following targets for intensification as proportion of overall growth through the period of recovery:*
  - a. *35% averaged over the period between 2013 to 2016*
  - b. *45% averaged over the period between 2016 to 2021*
  - c. *55% averaged over the period between 2022 and 2028*
2. *providing higher density living environments ...*
3. *reinforcing the role of the Christchurch central business district*
4. *providing for the development of greenfield priority areas, and of land within Future Development Areas where the circumstances in Policy 6.3.12 are met, on the periphery of the Christchurch's urban area, and surrounding towns at a rate and in locations that meet anticipated demand and enables the efficient provision and use of network infrastructure*
5. *encouraging self-sufficient growth of the towns of Rangiora, Kaiapoi, Woodend, Lincoln, Rolleston and Prebbleton and consolidation of the existing settlement of West Melton;*

82. This policy sets out how urban form and settlement is to be managed and includes providing for GPA and FDA in 6.2.2.(4), but does not specify this as limiting development, rather it is one of several methods to be utilised. Significantly, in relation to the Proposal for additional MRZ at South Kaiapoi, **Objective 6.2.2.(5)** of the CRPS lists *"encouraging sustainable and self-sufficient growth of the towns of Rangiora, Kaiapoi Woodend, Lincoln, Rolleston and Prebbleton."* This statement refers to several towns which do not have GPAs or FDAs and therefore strongly indicates that the reference to GPAs and FDAs in 6.2.2.(4) sits within, but does not override, the methods of providing for development with Greater Christchurch. In my opinion this positive approach is in line with, and supports, the NPS-UD which is a higher order policy document.
83. With regard to **Policy 6.3.1**, I note that the Principal reasons and explanation for this policy state:  
*Map A shows existing urban areas and priority areas for development for Greater Christchurch. These areas are identified as being required to provide sufficient land zoned for urban purposes to enable recovery and rebuilding through to 2028. The Policy and Map A provide a clear, co-ordinated land use and infrastructure framework for the recovery of Greater Christchurch.*

These comments strongly indicate that the provisions are to achieve recovery with the expectation that this will occur by 2028. I presume it was considered that by this stage the CRPS would be reviewed with a renewed focus on the natural growth demands of Greater Christchurch. In my opinion the recovery in terms of housing provision has largely occurred and we are now in a period of responding to current and future non-earthquake related demand. Unfortunately, we are (again) in the position where district plans are being reviewed but with the review of the CRPS lagging behind.

84. Of particular relevance is **Policy 6.3.11** Monitoring and Review. This policy anticipates that monitoring and review of the available supply of residential and business land could identify a shortfall or that Housing and Business Development Capacity Assessments undertaken as required by the NPS-UD could indicate *"insufficient feasible development capacity to meet demand in the short to medium term"*. This policy anticipates the possibility of undersupply of rezoned land for housing due to changes to a range of factors. The Principal reasons and explanation of this policy state that the *"the policy framework should be responsive to this variation in order to meet any change in circumstances"*. I assume this is referring to both the regional and district policy framework. Earlier in my evidence I discuss the evidence of Mr Colegrave and noted his conclusion that the current housing capacity assessments are very likely to have over-estimated the supply of land based on assumptions that multi-unit housing will

predominate whereas there is a consistent high demand for standalone houses. This review and assessment along with other undertaken by economists indicate that rezoning of additional residential land through the District Plan review process is appropriate and timely. On this basis I consider that Policy 6.3.11 provides for new residential growth areas to be identified for Kaiapoi.

85. Clause 5 of Policy 6.3.11 sets out criteria to be met in relation to alteration of existing or new Greenfield Priority Areas and Future Development Areas. In my opinion these criteria provide a robust basis for assessment of areas proposed for rezoning. I address the criteria relevant to the South Kaiapoi site below and conclude that these are met.

Infrastructure being in place or able to be economically and efficiently provided

All required services are either available or can be extended to the site. Discussions have been held with the Council regarding development contributions to enable extensions of existing reticulation and, if required, creation of additional capacity for the Councils sewerage treatment ponds. The District Council has already undertaken investigation and proposed servicing of new areas of Kaiapoi and has determined that provision of the required services for residential development including south Kaiapoi is feasible.

Safe, convenient and sustainable access to community, social and commercial facilities

While the site is at the southern extent of Kaiapoi, it is relatively close to some community facilities and schools and is already well serviced by public transport services within Kaiapoi and between Kaiapoi, Rangiora and Christchurch City the bus stop being with a 1-2minute walk to the site accesses.

Urban consolidation continues to be achieved

The site is a logical extension of Kaiapoi and assists in retaining its consolidated urban form.

**Proposed Waimakariri District Plan**

86. The following assessment considers the proposed rezoning of the submitter's site from Rural Lifestyle to Medium Density Residential in relation to the PWDP objectives and policies.
87. **Strategic Directions, Objective 2** in the Proposed Plan sets out the desired outcomes for urban development including Urban development and infrastructure that:
- (a) Is consolidated and integrated with the urban environment,
  - (b) recognises the existing character, amenity values and is attractive and functional to residents, business and visitors,

- (c) Utilises the Councils wastewater, potable water supply and stormwater infrastructure where available;
- (d) Provides a range of housing opportunities, focusing on new residential activity within existing towns;
  - (a) Support a hierarchy of urban centres, with the Districts main centres in Rangiora, Kaiapoi, Oxford and Woodend being .... The focus around which residential development and intensification can occur;
  - (b) Provides people with access to a network of spaces with urban environments for open space and recreation.

88. My assessment of the requested MDR rezoning against these criteria is set out below and draws on the Urban Design assessment of Vickramjit Singh. All of these criteria are met.

- (a) The South Kaiapoi site immediately adjoins the Kaiapoi township and its residential zoning.
- (b) The proposed rezoning and revised outline development plan recognise the character of the area incorporating the lower area near the railway line as a reserve and as a stormwater area available to the public as a reserve.
- (c) The development will generally connect to Council's existing reticulated services, however where this is not possible development contributions have been agreed with Council for upgrading and/or extension of the existing services as discussed in the evidence of Jamie Verstappen.
- (d) The submission requests Medium Density Residential zoning which will enable a variety of section sizes consequently a range of housing options.
- (e) The proposed Medium Density zoning will provide for full residential use of this site which provides the final piece of the land of a size and shape in south-east Kaiapoi.
- (f) The new ODP prepared for the site provides for very good connectivity within the site as well as access to the local purpose and esplanade reserves around the perimeter of the site including a setback strip along Main North Road.

89. **Urban Form and development, Policy 2 (UFD-P2)** addresses the identification and location of new Residential Development Areas. It is therefore not directly relevant as the submitter is no longer pursuing their request for a South Kaiapoi Development Area. However, I consider it is useful to assess the proposed residential zoning against the criteria in this policy. These criteria are in clause 2 of UFD-P2 which I set out below with associated comments:

***UFD-P2 Identification/location of new Residential Development Areas***

89. *For new Residential Development Areas, other than those identified by (1) above, avoid residential development unless located so that they:*

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

Comment: The South Kaiapoi site adjoins the current south-eastern extent of the Kaiapoi township and the outline development plan provides for a coordinated pattern of development in this area providing vehicle and cycle/pedestrian links.

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

Comment: The development associated with the rezoning will require and facilitate the construction of a new internal road with two accesses to Main North Road as well as maintaining access across the railway line to the remainder of the Winter brothers land. Pedestrian access is provided around and through the site and a new footbridge is proposed across the Kaikainui Stream through to the Riverside area. The development will generally connect to Council's existing reticulated services, with development contributions agreed with Council for upgrading and/or extension of the existing services where required.

(c) *have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport;*

Comment: The site has large areas of reserve that will be very accessible for residents and visitors enabling walking along the two streams and through to Riverside. Public transport is available on Main North Road and park and ride facilities are also easily accessible.

- (d) *concentrate higher density residential housing in locations focusing on activity nodes such as key activity centres, schools, public transport routes and open space*

Comment: This site is anticipated to have higher density than existing residential development in the general area. While the site is not close to a key activity centre it has generous open space and good connectivity to neighbouring areas in addition to being well served by public transport.

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

Comment: These requirements are now less relevant with the global rezoning of Kaiapoi's residential areas as Medium Density Residential as this zoning provides for medium, and possible some higher density development throughout the town. The submitter intends to incorporate a variety of housing within this development in response to demand.

- (a) *are informed through the development of an ODP;*

Comment: A revised ODP has been prepared for the site which provides for very good connectivity within the site as well as access to the local purpose and esplanade reserves. Rooding, pedestrian and cycle links are identified as well as substantial areas of native plantings.

- (b) *supports reductions in greenhouse gas emissions; and*

Comment: The ODP provides for passive and active transport and provides ready access to public transport and the Park and Ride facility for people wishing to commute to Christchurch.

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

Comment: The non-urban flood overlay on the Proposed District Plan planning maps indicates a flooding of this under various flood events. This matter is discussed in detail in the evidence of Greg White and Jamie Verstappen. The potential flood levels have been considered in the potential development of the site by raising ground levels while ensuring any runoff or displacement onto adjoining properties is controlled to avoid any increase in flooding.

90. The above assessments of the South Kaiapoi site based on the requirements of **Strategic Objective 2** and **Urban Form and development Policy 2** (for residential zones and development areas) confirm that the site satisfies both higher level and the more detailed location and servicing requirements. On this basis I consider the residential zoning of the South Kaiapoi site is appropriate with it satisfying all relevant planning criteria. I address the suitability of the site remaining in rural production use later in my evidence with the conclusion that there is no positive future due to a range of factors commonly experienced on the outskirts of towns.

### **Overall policy assessment**

91. In conclusion it is my opinion that the requested rezoning of the site at South Kaiapoi is a logical extension of Kaiapoi and conforms with all relevant planning policies with the minor exception that it is not provided for in Map A of the CRPS.

### **RESOURCE MANAGEMENT ACT**

92. There is a clear mandate in the RMA to plan for the future needs of communities and the natural environment. This is encapsulated in the purpose of the Act in section 5, namely by promoting the sustainable development of natural and physical resources. This requirement includes providing development at a rate which enables people and communities to provide for their “social, economic and cultural wellbeing while meeting a number of bottom lines including meeting the reasonably foreseeable needs of future generations”. In addition s31(1)(aa) requires:

*The establishment, implementation, and review of objectives, policies, and methods to ensure that there is sufficient development capacity in respect of housing and business land to meet the expected demands of the district.*

93. Obviously reviewing of a district plan is the primary opportunity for Councils to ensure sufficient development capacity. This involves the Council in researching supply and demand for land for housing and business in the short and at least medium term. However, in my opinion Council should also be open-minded regarding additional options for supply offered by way of submissions to the Proposed Plan. My reasoning for this is twofold. Firstly, as has recently been apparent, it is possible that the HCA (discussed above) may overestimate the availability of land and therefore underestimate supply. It also makes sense to consider options that might not have been obvious when the Plan was reviewed. Secondly, I consider that there are many benefits, and few disbenefits in having more land zoned for development than is required in

the short term. Until there is demand land can continue to be farmed or used for some other non-urban uses. This generally does not create any issues for the community. In the present case, I understand that the current owners have increasingly found it difficult to carry out many farming activities for a range of reasons including the proximity of residential development and difficulties accessing the site with large farming equipment. This matter is addressed further in my evidence.

## **SECTION 32AA EVALUATION**

94. Section 32AA(1)(a) of the RMA requires a further evaluation in respect of the amendments sought to since the Council's Section 32 evaluation for the pWDP was completed. Assessment under Section 32AA is an evaluation of the Proposal compared to the notified provisions in the pWDP and is to be undertaken in accordance with Section 32(1) to (4), including:
- (a) The extent to which the objectives of the proposal are the most appropriate to achieve the purpose of the RMA; and
  - (b) Whether the provisions in the proposal are the most appropriate way for achieving the objectives by including consideration of any other reasonably practicable options, the efficiency and effectiveness of the provisions in achieving the objectives, and reasons for deciding on the provisions.
95. The Proposal does not request any changes to the objectives or rules of the pWDP. The objective of the Proposal is to create a residential zoning option in South Kaiapoi. The development will be controlled and managed by way of the South Kaiapoi Outline Development Plan and through adoption of the subdivision, development and activity standards for the Medium Density Residential zone. I have assessed the proposed MRZ zoning for the South Kaiapoi site against the relevant Proposed Waimakariri District Plan objectives and policies in this evidence concluding that the requested rezoning is consistent with the outcomes sought by Strategic Directions and Urban Form and development objectives and policies.

### **Identification and assessment of options**

96. To determine the most appropriate means to achieve the outcomes sought by the Mike Greer Homes submission the following options have been considered:
- a) Option 1: status quo/do nothing – do not rezone the site from RLZ to MRZ
  - b) Option 2: rezone the site MRZ

- c) Option 3: apply for subdivision and land use consents over time

These options are assessed in the table below.

<b>S32 matter</b>	<b>Option 1: Rural Lifestyle Zone Status quo</b>	<b>Option 2: MRZ Residential</b>	<b>Option 3: Resource consents</b>
<b>Cost</b>	None to the applicant	Time and money cost to applicant for rezoning through submission to PWDP Time and cost to obtain subdivision and land use consents Development contributions	Time and money cost to applicant seeking non-complying status subdivision and land use consents, probably not granted. Community cost and uncertainty as to use of the site. Does not provide for sustainable growth and comprehensive approach to development of Kaiapoi provision for the
<b>Benefit</b>	Ongoing low rural productivity from the site. Maintains existing rural character	Provides for residential growth in Kaiapoi which achieves integration with transport links and servicing. Provides for consolidated urban form Provides for housing forms consistent with	Resource consents very unlikely to be granted. Ongoing low rural productivity from the site. Maintains existing rural character

		<p>Central government policy and direction</p> <p>Provides certainty for proposed servicing in South Kaiapoi</p> <p>Creates a quality residential environment</p>	
<b>S32 Matter</b>	<b>Option 1: Rural Lifestyle Zone Status quo</b>	<b>Option 2: MRZ Residential</b>	<b>Option 3: Resource consents</b>
<b>Efficiency/ Effectiveness</b>	<p>Ongoing low rural productivity from the site.</p> <p>Development occurs on other sites around Kaiapoi the do not achieve a compact urban environment</p>	<p>MRZ enable efficient and effective infrastructure servicing</p> <p>Effective as utilises isolated rural land surrounded by roads, railway and residential development.</p> <p>Shape of site and gradients with provide for an efficient residential layout and ample provision for stormwater retention and treatment.</p> <p>Provides for southern extension of Kaiapoi indicated in DDS</p>	<p>Unlikely to be effective as outcomes from consent process very uncertain.</p> <p>In the unlikely situation that consents are granted this could potentially result in ad-hoc development and un-coordinated servicing provision.</p>
<b>Risk</b>	<p>Site is used for rural activities with continuing issues re amenity impacts on</p>	<p>None</p> <p>The whole site will be developed in a coordinated manner and provide for an</p>	<p>Risk of consents not being granted or being piecemeal leaving the site as low-productivity rural land.</p>

	neighbouring residents. Site will likely become less viable as a farming operation.	integrated residential development providing extensive reserve provision and connections to adjoining areas.	Less chance for creation of reserves and connections to adjoining areas.
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97. On the basis of the above assessment Option 2 to rezone the site MRZ is considered to be the most appropriate means to achieve the outcomes sought in the submission of Mike Greer Homes in summary because:

- It can be developed consistent with the subdivision , development and activity standards of the MRZ
- It will be consistent with and give effect to the PWDP objectives and policies for Residential Zones and Urban Growth
- It is a logical extension to South Kaiapoi which achieves a compact and efficient urban form and will have no adverse effect on adjoining RLZ land.
- There will be no or limited additional cost to the Council for re-zoning as there is capacity and development contributions in place to service the area.
- The rezoning is the most appropriate way to achieve growth of south Kaiapoi.
- The economic, social and environmental benefits of the outcomes sought by the submission outweigh the potential costs.

## CONCLUSION

98. I conclude that rezoning the South Kaiapoi site is a logical planning response to the clear need to provide for the growth of Kaiapoi to provide for more housing. The rezoning is consistent with all higher and lower level resource management policies and plans, other than the site not being identified in Map A of the CRPS and will seamlessly extend the residential area in the south east of Kaiapoi from the Kaikainui Stream to the Courtenay Stream.

99. Overall it is considered that the rezoning is an appropriate, efficient and effective means of achieving sustainable growth for Kaiapoi and thereby the purpose of the Resource Management Act.

Patricia Harte

3 May 2024