



Submission on Proposed Waimakariri District Plan

M [REDACTED] Hales

26 November 2021

Waimakariri District Council

RESOURCE MANAGEMENT ACT 1991

WAIMAKARIRI DISTRICT COUNCIL

SUBMISSION ON THE PROPOSED WAIMAKARIRI DISTRICT PLAN

Submitter Details

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Trade Competition:

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

Hearing Options:

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

Specific Provisions to Which this Submission Relates:

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

District Planning Maps.

General District Wide Matters – Strategic Directions, UG Urban Growth.

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

Residential Zones.

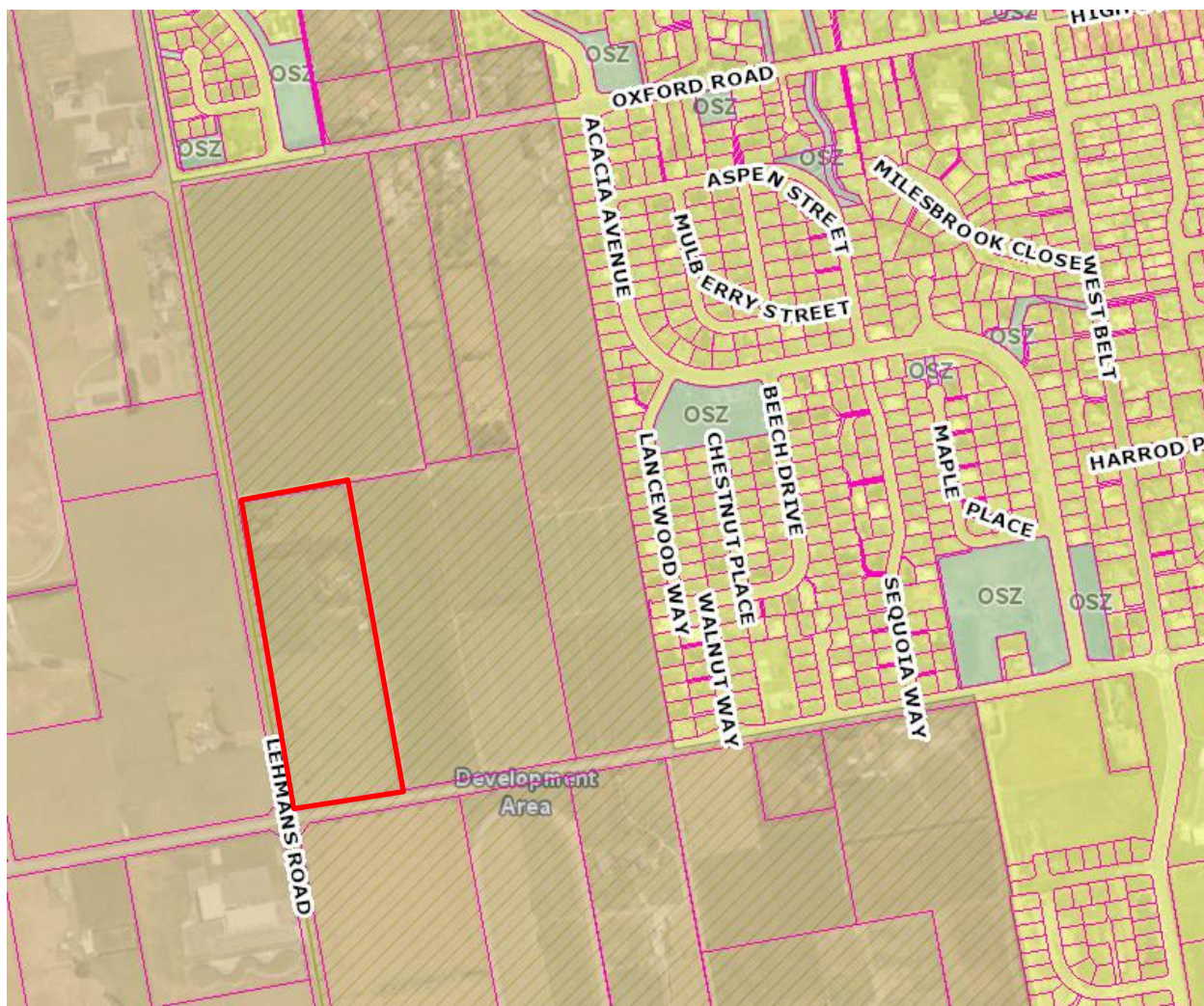


Figure 1: Site subject to the submission (outlined in red)

Decision we wish the Council to make:

Preferred Relief:

1. Amend Proposed Waimakariri District Plan (PWDP) Planning Maps by rezoning the following land from Rural Lifestyle Zone (**RLZ**) to General Residential Zone (**GRZ**) and Residential Medium Density Zone (**RMDZ**). The landownership and cadastral information directly affected by this submission is shown in **Table 1** below.

Registered Owner	Appellation Title	Area (ha)
Miranda Hales	Pt RS 48562	5.57 ha

Table 1. Legal descriptions and ownership of land parcel for which residential rezoning is sought.

2. As a less preferred alternative, retain but address the concerns with the PWDP certification process including so that it is a fair, equitable, transparent, appealable, efficient and fast process for delivering land for housing.
3. Amend the West Rangiora Outline Development Plan by removing all medium density areas and discuss potentially suitable locations in the ODP narrative, not on the ODP
4. Amend the PWDP provisions as follows: (additions in bold and underlined, and deletions as strike out) as below.
5. Any consequential, further or alternative amendments to the PWDP to be consistent with and give effect to the intent of this submission and the interests of the Submitter, including any changes necessary to give effect to the Enabling Housing Supply and Other Matters Resource Management Amendment Act.

Amend the West Rangiora Outline Development Plan narrative as below

DEV-WR-APP1 - West Rangiora Outline Development Plan

Land Use Plan

The Outline Development Plan for the West Rangiora Development Area provides for a variety of site sizes, **including some medium density residential activity. Appropriate locations will be determined at subdivision design stage. Suitable locations may include overlooking open space/green corridors and reserves; in proximity to reserves, existing or planned future public transport routes and/or local centres. Small clusters are likely to be suitable throughout the ODP area..**, ~~with medium density residential activity located along a key north/south primary road connection and along Johns and Oxford Roads, as these are suitable to have public transport links and associated higher amenity areas. Locating medium density residential activity along these maximises opportunities for alternative transport, including walking and cycling, to local amenity and services. The location of a concentration of medium density residential activity, at a minimum ratio of 70% medium density~~

~~and a maximum of 30% general density, at either side of this primary road as shown in the Outline Development Plan is therefore fixed.~~ The Medium Density Residential Zone enables a minimum lot size of 200m² while the General Residential Zone enables a minimum lot size of 500m². Overall, the West Rangiora Development Area shall achieve a minimum residential density of 15 households per ha, unless there are identified constraints to development, in which case an exemption shall apply, no less than 12 households per ha shall be achieved.

For water, wastewater and stormwater servicing reasons, staging of development from the south to the north is preferable, except where initial development can be serviced through a temporary commitment of existing infrastructure capacity. ~~Development within the West Rangiora Development Area is to be contiguous. The Outline Development Plan does not anticipate physically separated or ad-hoc development.....~~

Fixed Outline Development Plan Features for the West Rangiora Development Area:

~~Location of a concentration of medium density residential activity (meaning a minimum ratio of 70% medium density residential zone density and a maximum 30% general residential zone density) immediately adjoining the new north/south road~~

Location of the local/neighbourhood centre at the juncture of Oxford Road and the north/south road

Green link with cycleway adjoining the north/south road

Location of stormwater corridor at eastern edge of the West Rangiora Development Area

Separated shared pedestrian/cycleway at Johns Road and southern part of new north/south road

Cycleways at Oxford Road, the new north/south road, Johns Road, Lehmans Road and southern flow path

Integrated road connections with 77A Acacia Avenue, Beech Drive, Walnut Way and Sequoia Way

Flow paths and adjoining green links and cycleways, including any required water body setbacks

Part 2 – District Wide Matters.

Strategic Directions

SD-02

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 as a minimum achieve the housing bottom lines in UFD-O1*

UFD-O1

Feasible development capacity for residential activities

At least sufficient feasible development capacity for residential activity in each township to meet specified housing bottom lines, a wide range of housing types, sizes and densities and a changing

demographic profile of the District as follows: ...{updated housing capacity bottom lines}

UFD-O2

Feasible development capacity for commercial activities and industrial activities

At least sufficient feasible development capacity to meet commercial and industrial development demand.

UFD-P6

Mechanism to release Residential Development Areas

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

Subdivision

SUB-O1

Subdivision design

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

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

SUB-P6

Criteria for Outline Development Plans

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

1. *be prepared as a single plan; and*
2. *be prepared in accordance with the following:*
 - c. *for new Residential Development Areas, demonstrate how each ODP area will achieve a minimum net density of at least 15 lots or households per ha, unless there are demonstrated constraints then ~~no less than 12 households per ha~~ **a reduced density standard or density***

exemption shall apply.

SUB-P7

Requirements of Outline Development Plans

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

SUB-S3 Residential yield

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

Activity status when compliance not achieved: NC

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

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

Activity status when compliance not achieved: DIS

General Objectives and Policies for all Residential Zones

RESZ-O5

Housing choice

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

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

RESZ-P14

Development density

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

1. in new Development Areas, achieve a minimum net density of 15 households per ha averaged across the whole of the residential Development Area within the relevant ODP, unless there are demonstrated constraints then **a density exemption shall apply. Constraints may include but**

not be limited to protection of springs and historic heritage, ground conditions, and existing subdivision and housing patterns.~~less than 12 households per ha. ..~~

GRZ – General Residential Zone

GRZ-P1

Residential character and amenity values

Provide for activities and structures that support and maintain the character and amenity values anticipated for the zone which:

1. provides for suburban character on larger sites primarily with detached residential units;
2. provides for a pleasant residential environment, in particular minimising the adverse effects of nighttime noise, glare, and light spill, and limited signs;
3. provides opportunities for multi-unit residential development ~~on larger sites~~;
4. has sites generally dominated by landscaped areas, with open spacious streetscapes;
5. through careful design provides a range of higher density living choices to be developed within the zone; and
6. provides for small scale commercial activity that services the local community, and home businesses at a scale consistent with surrounding residential character and amenity values.

The use of a certification process to manage urban development within a Development Area is opposed and this submission requests that the Council to apply the appropriate residential and other zones and the means to bring land to the market through an RMA process. The land within the Development Areas is required to be rezoned in the Proposed Waimakariri District Plan to meet the requirements of the National Policy Statement – Urban Development.

As a less preferred relief, retain the certification process but amended to address the concerns raised in this submission, and any further concerns identified through further investigation. It should be a transparent, equitable, fair and appealable process and not duplicate the requirements of the RMA subdivision processes.

Reasons for the Submission

4. The reasons for our submission are outlined below. In summary:
 - a) The preferred relief (**the proposed rezoning**) is both appropriate and necessary to achieve sustainable growth and development of Rangiora and to meet the requirements of the National Policy Statement for Urban Development 2020 (NPS-

UD). It is consistent with and gives effects to the Resource Management Act 1991, including Part 2 and Section 32.

- b) The Site identified in Figure 1 is a logical and preferred location for further urban growth of Rangiora. It has been identified in the Proposed Waimakariri District Plan (PWDP) as part of the West Rangiora Development Area and recognized as a Future Development Area (FDA) in the Canterbury Regional Policy Statement (CPRS).
- c) The FDAs for Rangiora on Map A of the CPRS need to be rezoned as soon as possible to give effect to the NPS-UD.
- d) At present rates of land uptake there is about 4 years vacant land supply in Rangiora. Given it takes 3-5 years to bring land from zoned state to on the market as developed lots, there is some urgency in providing additional capacity. This proposal helps address an anticipated shortfall in residential zoned plan enabled land.
- e) Rezoning of the Site for residential purposes will give effect to Policy 12 in the CPRS.
- f) It will help achieve a compact, and efficient, urban form with connectivity with multiple transport modes.
- g) The proposed rezoning will accommodate approximately 70 GRZ lots, which will contribute towards meeting the housing needs of Rangiora.
- h) Adverse effects on the environment arising from the proposed rezoning will be minimal and can be adequately mitigated.
- i) The proposed rezoning is consistent with the PWDP objectives and policies, relating to Strategic Directions Urban Form and Development and Urban Growth, particularly as proposed to be amended in this Submission.
- j) The alternatives of retaining General Rural or Large Lot Residential zones across the entire Site are not an efficient use of land and does not give effect to Change 1 of the CPRS.
- k) The proposed rezoning is consistent with and the most appropriate, efficient, and effective means of achieving the purpose of the RMA.

Certification

- 5. The Submitter wishes to obtain residential rezoning as soon as possible so they can either proceed with development, or sell it to another party for urban development.
- 6. There is a risk that developers and landowners may shy away from certification because of the uncertainties associated with it as it is presently set out in the PWDP. The process is

highly discretionary, does not provide conventional rights to an applicant (e.g. right of objection/appeal) meaning decisions cannot be challenged, and it is not apparent that the process will be appropriately documented with a transparent record of the decision-making within the certification process. Further certification lapses if a s224 subdivision completion certification is not granted within three years of obtaining certification¹. Rezoning does not follow certification. Rezoning only occurs when the entire West Rangiora Development Area is rezoned². This may well not happen during the life of the PWDP as there may be some landowners not wishing to develop in the short-medium term.

7. We understand that there is an ability to meet the s224 subdivision 'completion' requirement by, for example, completing an initial 2 lot subdivision of a development area. The subdivision is in reality hardly underway, but services will have been allocated to potentially a significant area indefinitely which may prejudice other subdividers if there are, for example, servicing capacity constraints. Also – it is not clear how services will be allocated between different certification applicants. Will it be on a first come first served basis, or does the Council has favoured areas?
8. The certification rules do not take effect until Council decisions are issued on submissions and further submissions (earliest late 2024) and later if the certification provisions are subject to appeal. The information and design details required are substantial – the process can be expected to take 1- 2 years+ depending on the size of subdivision. They are a slower and far less certain method for delivering land for housing than the Council rezoning the land. In circumstances where there is an acute housing need and rapidly escalating house and land prices fuelled in part by a shortage of supply, the Council needs to act quickly and with certainty to address the shortfall. Whilst innovation is important, this is not the time to be testing a new uncertain and unproven method for delivering land for housing.
9. It is also contrary to the directive of the higher order planning documents. Policy 6.12 of the CRPS expressly refers to demonstrating a need to provide further feasible development capacity *through the zoning of additional land* in a district plan to address a shortfall in the

¹ PWPD DEV-WR-S1.2

² PWDP WR-West Rangiora Development Area Introduction ..'Once development of these areas has been completed, the District Council will remove the Development Area layer and rezone the area to the appropriate zones'

sufficiency. The explanation to Policy 6.3.12 *provides for the re-zoning of land within the Future Development Areas, through district planning processes*, in response to projected shortfalls in feasible residential development capacity over the medium term. Certification does not do this. The NPS-UD is discussed below.

The Site and Background

- 10.** The subject site property is legally described as Pt RS 48562 and comprise a total of approximately 5.5 hectares located on the south west corner of Lehmans Road and Johns Road (as shown on **Figure 2**). The anticipated net residential yield from the site is around 70 sections, based on 15 hh/ha.
- 11.** The is currently leased for grazing and cropping purposes. The submitter intends to make the land available for development as soon as urban zoning is in place. Existing urban services extend to Lehmans Road, and it is understood to be planned to extend to Johns Road.

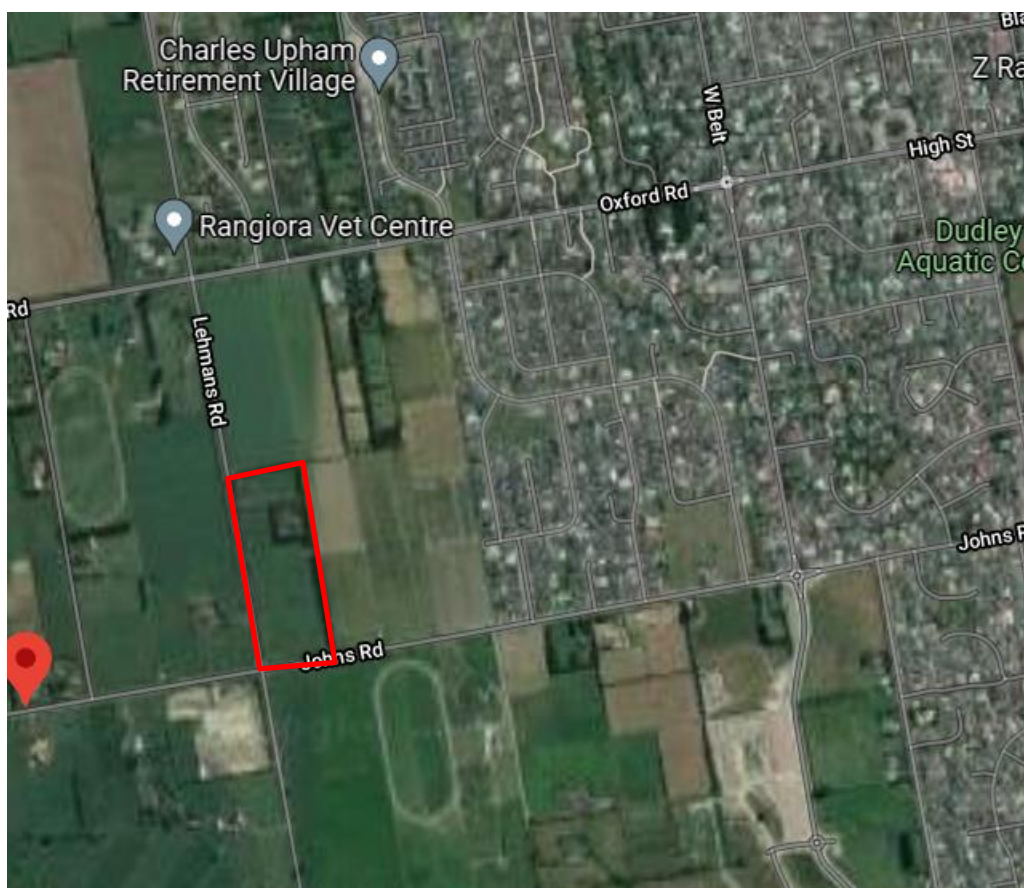


Figure 2: Locational Context of the site (outlined in red)

12. The Site is identified as part of the West Rangiora Development Area in the PWDP. This gives effect in part to one of the growth options for Rangiora shown in the Waimakariri District Development Strategy (WDDS).

STATUTORY PLANNING CONTEXT

Chapter 6 of the Canterbury Regional Policy Statement ('CRPS):

13. The Site is included as a Future Development Area (**FDA**) the CRPS on Map A of (**Figure 3** orange). The Site location is marked approximately by the blue arrow.
14. The FDAs are intended to accommodate the increased demand for new dwellings in that part of Waimakariri District within the Greater Christchurch Urban Area and to respond to the NPS-UD. They do not provide "plan enabled" land as they need to negotiate a re-

zoning process to confirm their status as land developable for housing and other urban purposes.

12. Policy 6.3.12 in Chapter 6 of the CRPS provides for the re-zoning of land within the Future Development Areas, through district planning processes, in response to projected shortfalls in feasible residential development capacity over the medium term. The Policy establishes several criteria to be considered when deciding whether to put a residential zoning in place.

6.3.12 Future Development Areas

Enable urban development in the Future Development Areas identified on Map A, in the following circumstances:

1. It is demonstrated, through monitoring of housing and business development capacity and sufficiency carried out collaboratively by the Greater Christchurch Partnership or relevant local authorities, that there is a need to provide further feasible development capacity through the zoning of additional land in a district plan to address a shortfall in the sufficiency of feasible residential development capacity to meet the medium term targets set out in Table 6.1, Objective 6.2.1a; and
2. The development would promote the efficient use of urban land and support the pattern of settlement and principles for future urban growth set out in Objectives 6.2.1 and 6.2.2 and related policies including by:
 - a. Providing opportunities for higher density living environments, including appropriate mixed use development, and housing choices that meet the needs of people and communities for a range of dwelling types; and
 - b. Enabling the efficient provision and use of network infrastructure; and
3. The timing and sequencing of development is appropriately aligned with the provision and protection of infrastructure, in accordance with Objective 6.2.4 and Policies 6.3.4 and 6.3.5; and
4. The development would occur in accordance with an outline development plan and the requirements of Policy 6.3.3; and
5. The circumstances set out in Policy 6.3.11(5) are met; and
6. The effects of natural hazards are avoided or appropriately mitigated in accordance with the objectives and policies set out in Chapter 11.

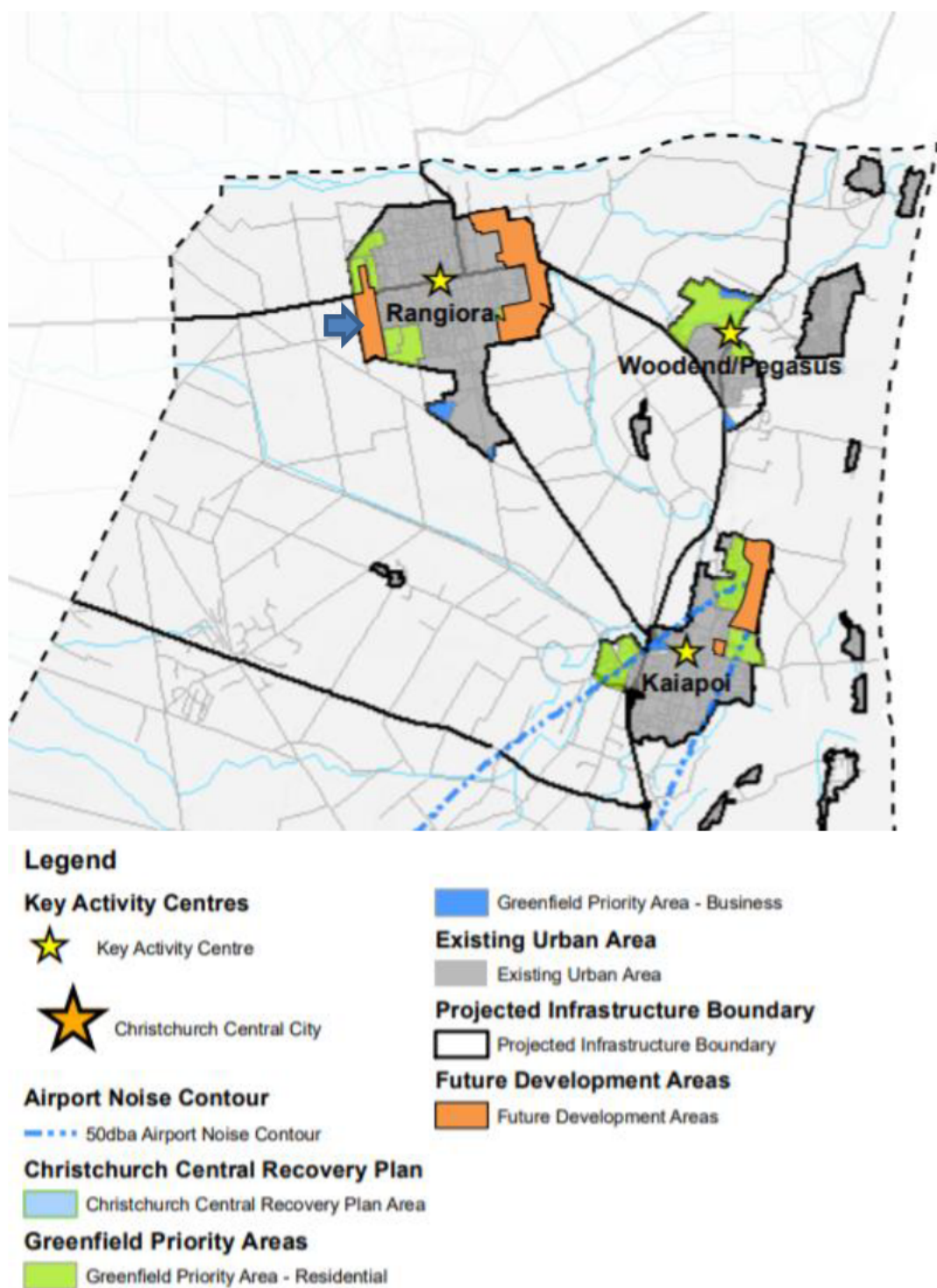


Figure 3: Map A Chapter 6 Regional Policy Statement Greenfield Priority areas (Approximate location of Site indicated by the )

13. Policy 6.11.5 relates to any changes resulting from a review of the extent, and location of land for development, any alteration to the Greenfield Priority Areas, Future Development

Areas, or provision of new greenfield priority areas, shall commence only under the following circumstances (relevant to this Plan Change):

- i. Infrastructure is either in place or able to be economically and efficiently provided to support the urban activity;
 - ii. Provision is in place or can be made for safe, convenient and sustainable access to community, social and commercial facilities;
 - iii. The objective of urban consolidation continues to be achieved.
14. There are two parts to consider. Firstly there is a trigger to enable a change of zoning, and secondly there are qualitative matters that must apply when the zone is developed. The triggers are Policy 6.3.12. (1) (2) and (3) and (5), discussed in turn below.

There is a need to provide further feasible development capacity through the zoning of additional land in a district plan to address a shortfall in the sufficiency of feasible residential development capacity to meet the medium-term targets set out in Table 6.1

15. The latest Housing Development Capacity Assessment (HDCA) was publicly released in July 2021 by the Greater Christchurch Partnership – see relevant tables in **Appendix 1**. They project a Medium Term (at 2031) shortfall in capacity for Waimakariri of between 3137 if the recently Gazetted Future Development Areas are excluded. If the FDAs are developed at 12hh/ha (lower projection) or 15hh/ha (higher projection) there is a projected medium term surplus of 2263 or 3713 respectively. The figures suggest that the Council would be justified in terms of Policy 12 of the CRPS in rezoning the FDAs now.
16. The situation for Rangiora looks is particularly urgent. The rate of residentially zoned land take-up over recent years has averaged around 180 hh/annum or the equivalent of around 15 ha/annum. There is currently capacity for 800 dwellings (approximately 65ha of vacant land if there is no intensification or infill) the equivalent of the General Residential Zone on the PSDP. This suggests that there will be little or no vacant land left by 2025-26, if not sooner.
17. There are 330 hectares of FDA land in Rangiora. If this was all made available twenty years of land supply would potentially be 'shovel ready' from around 2025. The figures suggest that all the FDA land needs to be made available to enable housing development as soon

as possible. Whilst this may create more residential land that is needed to meet demand in the short to medium term, the alternative of rationing supply in this instance would not be giving effect to the NPS-UD. There are no resource management reasons why all the FDA land should not be made available for development.

18. In fact, even if the FDAs were zoned by the year's end, it will be 'touch and go' whether there will be any residential land left by the time the subdivision consents are processed, titles issued, and houses built and occupied. Submissions that are promoting rezoning in the FUDAs should be seen as an immediate opportunity to bridge the projected shortfall and provide at least sufficient land for the Medium and early part of the Long Term.

The development would promote the efficient use of urban land and support the pattern of settlement and principles for future urban growth

19. Development of the Site needs careful integration with connections (including for active transport) to the town centre, current and potential employment areas, and community facilities. This is achieved through development being in accordance with the West Rangiora Outline Development Plan (WRODP).

The timing and sequencing of development is appropriately aligned with the provision and protection of infrastructure, in accordance with Objective 6.2.4 and Policies 6.3.4 and 6.3.5;

20. Policy 6.3.4 is about integrating transport infrastructure and land use, including reducing auto-dependency and promoting public and active transport. Sub regionally Rangiora is well connected to strategic rail and road connections both of which have potential to provide mass rapid transport services.
21. Policy 6.3.5 is directed at integrating land use and infrastructure: Ensuring that the nature, timing and sequencing of new development are co-ordinated with the development, funding, implementation and operation of transport and other infrastructure. Based on the District Development Strategy, it is assumed that the Site can be serviced through existing funding mechanisms and costs recovered through the Council's Development Contributions Policy. The matters listed under Policy 6.11 .5 are met, and there are no matters under Policy 11

(Avoidance of Natural Hazards) to consider.

22. Regarding the qualitative matters referred to in paragraph 13 above Policy 6.3.12 (4) requires the development to occur in accordance with an outline development plan and the requirements of Policy 6.3.3. Outline development plans and associated rules must be prepared as either a single plan for the whole of the Future Development Area or, where an integrated plan adopted by the territorial authority exists, for the whole of the Future Development Area. The WRODP applies to the wider area that incorporates this FDA, and the requirement is for the outline development plan to be consistent with that integrated plan. Due to the relative size of the Site many of the requirements Policy 6.3.3 may not apply but it is noted that the Development Plan appears to give effect to the Policy in most respects.
23. In conclusion, there are no compelling reasons in terms of Change 1 to the CRPS why this zoning cannot be approved.

Proposed Waimakariri District Plan

24. The Site is zoned Rural Lifestyle Zone (LRZ). The minimum lot size for subdivision and a dwelling in the LRZ is 4 ha. It is located within the West Rangiora Development Area (**Figure 4**) and the various layers in the West Rangiora Outline Development Plan.

National Policy Statement on Urban Development

29. Rangiora is growing apace. It is attracting significant interest from new home buyers as people respond to the significant investment in upgraded transport links (Northern Outlet and public transport) and a growing economic base for employment within the District and the City.
30. Rangiora is well connected to Christchurch City, both via the new Northern Corridor, and a recent cycleway link into Christchurch City. There is a regular bus service and potentially a future mass rapid transit service.
31. The proposed rezoning will support the competitive operation of land and development markets, both within Waimakariri District and the Greater Christchurch sub-region. The Site is identified as a location where Council and the community would prefer will provide

additional plan-enabled housing capacity for just under 300 mixed density sections that will go some way to meeting the emerging shortfall medium term capacity shortfalls for the District, which forms a component part of the housing shortfall across the District and the Greater Christchurch sub-region. In doing so, the proposed rezoning will enable Council to carry out its functions under s31(1) (aa) by ensuring there is sufficient development capacity in respect of housing.

32. The proposed rezoning also represents a 'well-functioning urban environment' as it will be able to satisfy the NPS-UD Policy 1 criteria and Policy 6, including by: (a) enabling a variety of homes that meet the needs of different households at densities that are in excess of the 10hh/ha minimum densities provided in the CRPS and Operative WDP; (b) supporting, and limiting as much as possible adverse impacts on, the competitive operation of land and development markets; (c) having good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and (d) supporting reductions in greenhouse gas emissions through current and future Council and Greater Christchurch Partnership transport initiatives and investment.

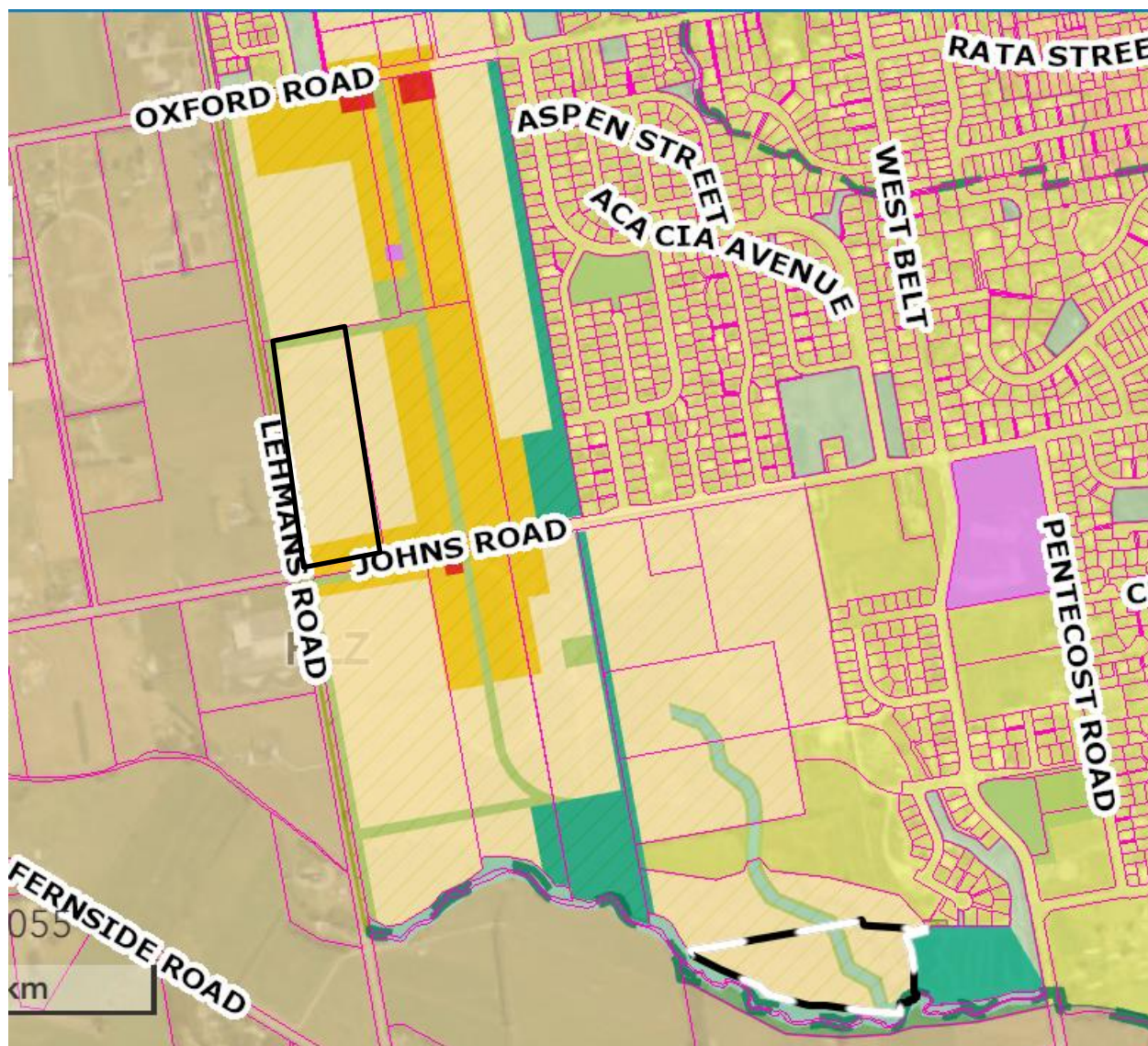


Figure 4: West Rangiora Development Area (Site outlined in Black)

33. The mandatory requirement of the NPS-UD is that every tier 1 local authority must provide at least sufficient development capacity to meet expected demand for housing. Development capacity for the medium term must be plan enabled; infrastructure ready; and feasible and reasonably expected to be developed³. Medium term means that at all times, there must be a least 10 years supply available.
34. For the medium term, 'plan enabled' land must be zoned for housing in a proposed district

³ NPS-UD clauses 3.2 and 3.4

plan.

35. For the medium term, 'infrastructure ready' means there is either adequate existing development infrastructure to support the development of the land; or funding for adequate infrastructure to support development is identified in a long term plan.
36. The PWDP certification approach does not satisfy the above mandatory requirements.

Other Planning Documents

37. The Waimakariri District Development Strategy (WDDS) indicated a general preference for the direction of urban growth of Rangiora. The WDDS set itself the task of:
 - a. Confirming a plan for land for new houses within broad residential growth directions for Rangiora, Kaiapoi, Woodend/Pegasus and Oxford (see Figures 11-14 of the WDSS); and
 - b. Undertaking further work to determine the specific growth areas through the NPS-UDC and the District Plan Review.
38. The approach of the WDDS was to signal growth options to be confirmed in the District Plan Review:

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

39. The Strategic Planning documents clearly signal a change in land use for the Site. included growth to the west of Rangiora which includes this Site.
40. Planned growth is intended to step block by block westwards out to Lehmans Road and to keep the town edge squared up providing depth to future development and providing a rational basis for providing movement networks. The West Rangiora Future Development Area, and subsequent residential zoning is the resource management instrument that implements this strategy.

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

41. The Government proposed in 2019 an NPS-HPL to prevent the loss of productive land and promote its sustainable management. The overall purpose of the proposed NPS-HPL is to improve the way highly productive land is managed under the Resource Management Act 1991 (RMA) to:
 - a) Recognise the full range of values and benefits associated with its use for primary production
 - b) Maintain its availability for primary production for future generations
 - c) Protect it from inappropriate subdivision, use, and development.
42. The NPS-HPL is still a proposal and not intended to take effect until after Gazettal anticipated mid-2021. At the date of this submission the NPS-HPL has no effect and no assessment of it is required for the purposes of this submission. In any event, the site has already been committed for housing development through the CRPS and the decision on whether soils on this site should be protected has already been made.

National Planning Standards

43. The National Planning standards prescribe various matters under the RMA so that there is consistency among planning documents most relevantly here in terms of appellations for zones, and the standards applying to these zones.
44. The proposed rezoning adopts the standard zone appellation, in this case General Residential, as contained in the PWDP.

Effects on tangata whenua values

45. There are no cultural value overlays affecting the Site.
46. The site is not listed as an archaeological site on the NZ Archaeological Site database.

Landscape and visual effects

47. The proposal will lead to a change in the landscape of the Site from a predominantly lifestyle block landscape to an urban environment dominated by residential building that will, in time, get the benefit of street tree and reserve plantings and landscape treatments around the houses.

48. The visual effects which will arise from a change in the number of vegetative and built elements in the landscape are significant, but not avoidable, if the Site is to contribute to the on-going growth of Rangiora. The change will contribute to a different amenity and quality of environment, still of a high quality, and one that will be entirely consistent with and supportive of the urban residential development that has proceeded to the north and east of the Site respectively already.
49. The landscape, amenity and visual changes have been foreshadowed in the PWDP Future Development Overlay for the Site and the Site's status as being within a preferred growth direction in the WDSS. The Strategy provides guidance and policy direction on how best to manage future residential development within the Waimakariri district.

Risks from natural hazards or hazardous installations

49. The PWDP planning maps show the Site as being within a Non-Urban Flood Assessment Area.
50. The District Plan maps do not identify high flood hazard areas or high coastal flood hazard areas but are identified through the flood assessment certificate process. This enables the most up-to-date technical information to be used. However, as a guide, areas that are potentially high hazard can be identified through the Waimakariri District Natural Hazards Interactive Viewer (NH - Introduction).
51. Parts of the Site are within a low flood hazard area, with a very small area medium hazard (**Figure 5**).



Figure 5: Flooding status of Site (outlined in red). Green – low risk; Blue – moderate risk; Grey; flood exclusion

52. Rules that refer to a Flood Assessment Certificate require a certificate to be obtained from the District Council to determine compliance with the relevant rule. The alternative is to apply for resource consent as set out in the rule.
53. Rule NH-R2 states

if located within the Non-Urban Flood Assessment Overlay, the building:

- a. is not located on a site within a high flood hazard area as stated in a Flood Assessment Certificate issued in accordance with [NH-S1](#); and
- b. has a finished floor level equal to or higher than the minimum finished floor level as stated in a Flood Assessment Certificate issued in accordance with [NH-S1](#); and

- c. is not located within an overland flow path as stated in a Flood Assessment Certificate issued in accordance with [NH-S1](#);

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

- 54. There will be no hazardous installations proposed on the Site.

Geotechnical assessment

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

Contaminated land

- 56. A Preliminary Site Investigation will be conducted for the Site at subdivision stage.

Positive effects

- 57. The proposed rezoning will provide for the continued growth of Rangiora by managing the development by adding to the supply of land and providing an addition locational choice for future residents. The proposal will provide a buffer to on-going high-level demand for lots in Rangiora. The Rangiora West Development Plan is anticipating an urban use that is a much more efficient use of a qualifying site supporting a well-functioning urban area. It is a positive endorsement of Rangiora as a growth node in the District.
- 58. From a community well-being perspective, the provision of additional land for residential growth will continue to support the Council’s investment in community infrastructure by maintaining and facilitating growth rates, increasing the rating base and attracting development contributions.

SERVICING FOR PROPOSAL & EFFECTS ARISING FROM SERVICING

- 59. Proposals for servicing the Site as GRZ and the effects from such servicing in relation to domestic water supply, wastewater, stormwater, roading, and telecommunications can be provided as evidence for any hearing if required. However, the Submitter’s position is that the Council must provide this information given that the NPS-UD directs it to rezone the Site.

CONCLUSION

60. There is no resource management reason as to why the Site cannot be zoned for residential development immediately. The Council, through its planning, has removed most of the statutory barriers to bringing the land to the market and leaving it rural is not an efficient, nor appropriate use of the Site given the high demand and high land prices in Rangiora and other parts of the District. It is understood that vacant standard residential section prices in Rangiora have, similar to Rolleston, approximately doubled in price in the last 6-12 months.
61. The proposal is in accordance with and supports the growth direction for Rangiora set down in the Canterbury Regional Policy Statement and Proposed Waimakariri District Plan. It promotes the social, economic and cultural well-being of current and future residents of Rangiora by adding to land supply. It gives effect to Change 1 of the CRPS and the National Policy Statement on Urban Development 2020 (NPS-UD) and is in accordance with, and supports, the objectives and policies of the other relevant planning documents. The proposed rezoning is the most appropriate planning outcome for the use of the land in a manner that promotes the purpose and principles of the RMA; and supports the Council in carrying out its functions under Section 31 of the Act.
62. The proposed certification process for delivering land for housing within the New Development Areas including at West Rangiora is opposed. In circumstances where there is an acute housing need and rapidly escalating house and land prices fueled in part by a shortage of supply, the Council needs to act quickly and with certainty to address the shortfall. Whilst innovation is important, this is not the time to be testing a new, uncertain and unproven method for delivering land for housing. A much quicker and more certain method for the Council to rezone the land in the New Development Areas, including the Site.
63. The mandatory requirement of the NPS-UD is that every tier 1 local authority must provide at least sufficient development capacity to meet expected demand for housing. Development capacity for the medium term must be zoned in a proposed plan and be infrastructure ready⁴.

⁴ NPS-UD clauses 3.2 and 3.4

A handwritten signature in black ink, appearing to read "T. D. A. A.", enclosed in a thin black rectangular border.

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

Date: November 26, 2021

Appendix 1: Greater Christchurch Partnership Housing Capacity Assessment (July 2021)

Table 2: Urban Housing Sufficiency within Greater Christchurch in the Medium Term 2021 – 2031 – excluding Selwyn and Waimakariri Future Urban Development Areas

Area	Feasible Capacity	Medium term demand + 20% short term margin	Surplus / Shortfall
Waimakariri	2,273	5,410	-3,137
Christchurch	101,994	18,215	83,779
Selwyn	6,452	8,541	-2,089
Total	110,719	32,166	78,553

Table 3: Adjusted Urban Housing Sufficiency within Greater Christchurch in the Medium Term 2021 – 2031 including Selwyn and Waimakariri Future Urban Development Areas at 15hh/ha.

Area	Feasible Capacity + FUDA 12/12.5hh/ha	Feasible Capacity + FUDA 15hh/ha	Medium term demand + 20% medium term margin	Medium term Surplus / Shortfall @ 15hh/ha	Medium term Surplus / Shortfall @ 12/12.5hh/ha
Waimakariri	7,673	9,123	5,410	3,713	2,263
Christchurch	101,994	101,994	18,215	83,779	83,779
Selwyn	12,208	13,502	8,541	4,961	3,667
Total	121,875	124,619	32,166	92,453	89,709

Table 4: Housing Urban Sufficiency within Greater Christchurch in the Long Term 2021-2051 including Selwyn and Waimakariri Future Urban Development Areas at 15hh/ha.

Area	Feasible Capacity + FUDA 12/12.5hh/ha	Feasible Capacity + FUDA 15hh/ha	Long term Demand + 15% long term margin	Long term Surplus / Shortfall @ 15hh/ha	Long term Surplus / Shortfall @ 12/12.5hh/ha
Waimakariri	12,192	13,642	13,059	583	-867
Christchurch	101,994	101,994	41,231	60,763	60,763
Selwyn	12,208	13,502	25,338	-11,836	-13,130
Total	126,394	129,138	79,628	48,344	46,766