

**BEFORE THE HEARINGS PANEL
FOR THE PROPOSED WAIMAKARIRI DISTRICT PLAN**

UNDER the Resource Management Act 1991 (RMA)
IN THE MATTER of the Proposed Waimakariri District Plan
AND
IN THE MATTER of Hearing Stream 1: General Matters, Definitions,
Strategic Directions and Urban Form and Development

**STATEMENT OF EVIDENCE OF JOANNE MITTEN ON BEHALF OF THE
CANTERBURY REGIONAL COUNCIL**

**HEARING STREAM 1
GENERAL MATTERS, DEFINITIONS, STRATEGIC DIRECTIONS AND
URBAN FORM AND DEVELOPMENT
1 MAY 2023**

Canterbury Regional Council's Solicitor
PO Box 4341 CHRISTCHURCH 8140
DX WX11179
Tel +64 3 379 7622
Fax +64 379 2467

WYNNWILLIAMS

Solicitor: L F de Latour / K T Dickson
(lucy.delatour@wynnwilliams.co.nz /
kate.dickson@wynnwilliams.co.nz)

SUMMARY STATEMENT

- 1 The Canterbury Regional Council (**Regional Council**) submission was generally supportive of the District Plan Review process. The Regional Council did, however, seek some amendments to the definitions, strategic directions, urban form and development and general matters chapters. These amendments were requested to give effect to the intent of the Canterbury Regional Policy Statement (**CRPS**), regional plans and the higher order statutory framework. The RMA requires that the proposed Waimakariri District Plan must give effect to the CRPS.
- 2 I have reviewed the S42A reports prepared by Mr Wilson and Mr Buckley (Overarching and Part 1 Matters, Strategic Directions and Urban Form and Development) for the Waimakariri District Council.
- 3 My evidence focuses on the recommendations that are important in giving effect to the CRPS, particularly where there has been opposition from other submitters. My evidence also addresses amendments to the proposed Waimakariri District Plan (**pWDP**) sought in the Regional Council submission where the intent of the submission can be clarified in light of the comments and recommendations in the S42A report.
- 4 These recommendations are mostly in relation to submissions on the need to incorporate Map A of the CRPS into the pWDP . I also have concerns regarding clarity in UFD-P2 and UFD-P3 specifically in relation to the identification of areas where development can and cannot occur.

INTRODUCTION

- 5 My full name is Joanne Maree Mitten.
- 6 I am a Principal Planner at the Regional Council, a position I have held since October 2011.
- 7 I hold a master's degree with honours in Geography from the University of Canterbury. I have over 17 years' experience in planning.
- 8 My relevant experience includes drafting plan provisions, section 32 report writing, and preparing submissions on plan changes. I led the development of the South Coastal Canterbury Streams sub-regional chapter in the Canterbury Land and Water Regional Plan.
- 9 Prior to joining the Regional Council, I worked as the Resource Management Planner for West Coast Tai Poutini at the Department of Conservation and prior to that as a central government agency planner in the UK.
- 10 Whilst I acknowledge that this is not an Environment Court hearing, I confirm that I have read and am familiar with the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023. I have complied with the Code of Conduct in preparing this evidence and I agree to comply with it while giving any oral evidence during this hearing. Except 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.
- 11 Although I am employed by the Regional Council, I am conscious that in giving evidence in an expert capacity that my overriding duty is to the Hearing Panel.

SCOPE OF EVIDENCE

- 12 I have prepared this planning evidence on behalf of the Regional Council.
- 13 My evidence is in relation to General Matters and Part 1, the Definitions, Strategic Directions, and Urban Form and Development chapters of the pWDP, to be heard as Hearing Stream 1. My evidence addresses:

- a. the Regional Council's interest in the pWDP and General matters and part 1, Definitions, Strategic Directions, and Urban Form and Development chapters;
- b. the relevant statutory framework with a particular focus on:
 - i. the National Policy Statement on Urban Development 2020 (**NPS-UD**);
 - ii. the National Policy Statement for Highly Productive Land 2022 (**NPS-HPL**);
 - iii. Strategic growth planning; and
 - iv. the CRPS;
- c. recommendations in the Section 42A Reports:
 - i. Proposed Waimakariri District Plan: Overarching and Part 1 matters, prepared by Mr Peter Wilson for the Waimakariri District Council., dated 13 April 2023
 - ii. Proposed Waimakariri District Plan: Rautaki ahunga - Strategic Directions, prepared by Mr Mark Buckley for the Waimakariri District Council, dated 13 April 2023.
 - iii. Proposed Waimakariri District Plan: Āhutatanga auaha ā tāone - Urban Form and Development, prepared by Mr Mark Buckley for the Waimakariri District Council, dated 5 April 2023.

14 In preparing my evidence I have reviewed the following documents:

- a. the Section 32 reports prepared and notified by Waimakariri District Council (WDC);
- b. the notified provisions of the Definitions, Strategic Directions, Urban Form and Development and Part 1- General Matters chapters of the pWDP;
- c. the submissions made on the notified provisions within the Definitions, Strategic Directions, Urban Form and Development and Part 1- General Matters chapters of the pWDP, to the extent they are relevant to the Regional Council's interests;
- d. the s42A reports identified above;

- e. the NPS-UD;
- f. the NPS-HPL;
- g. the NPS-HPL Guide to Implementation (March 2023);
- h. the CRPS;
- i. Change 1 to Chapter 6 of the CRPS;
- j. Our Space 2018–2048 Greater Christchurch Settlement Pattern Update (adopted by WDC on 2 July 2019);
- k. Greater Christchurch Housing Development Capacity Assessment (HCA), 30 July 2021.

REGIONAL COUNCIL’S INTEREST AND OVERVIEW OF SUBMISSIONS IN HEARING STREAM 1 OF THE PWDP

- 15 The Regional Council considers that the pWDP generally gives effect to the intent of the CRPS but the Regional Council does have some concerns relating to the chapters included in Hearing Stream 1. The Regional Council’s interest is outlined in the relevant sections below.
- 16 A copy of my recommended amendments is provided as **Attachment 1** to this statement of evidence.

Overarching Matters and Part 1

- 17 The Regional Council has made a submission on the pWDP in relation to general matters. The Regional Council sought amendments to provisions largely regarding urban development, and future development in Kaiapoi (including the certification process for the release of further developable land in Kaiapoi).

Definitions

- 18 The definitions in the pWDP generally give effect to the CRPS, however the Regional Council has expressed concerns in its submission with how some definitions in the natural hazards chapter align with the definitions in the CRPS.
- 19 The Regional Council has made a submission that seeks three amendments to definitions in the pWDP:

- a. High coastal flood hazard area;
 - b. Natural hazard sensitive activities; and
 - c. Community scale natural hazards mitigation works.
- 20 These amendments were sought to better align with the intent of the provisions and give better effect to the CRPS, to ensure that the criteria that needs to be accounted for is fully captured and to ensure that the maintenance of schemes by the Regional Council can occur in an efficient manner.
- 21 Given the indication in the section 42A report that definitions will be considered as part of the relevant chapter reports, and the definitions that the Regional Council has an interest in were not addressed in the section 42A report, these will be addressed in subsequent evidence for the relevant hearing streams.

Strategic Directions

- 22 The focus of the Regional Council's submission regarding strategic directions is to ensure that the pWDP aligns with the strategic directions of the Region.
- 23 The pWDP generally gives effect to the direction set out in the CRPS. However, the Regional Council does have concerns that the Strategic Directions in the pWDP are not explicit enough regarding the need to make appropriate use of soil which is valued for existing or foreseeable future primary production, in accordance with the NPS-HPL. The Regional Council would also like to see specific mention of papakāinga housing or marae as is addressed by CRPS Policy 5.3.4.
- 24 The Regional Council has made a submission that includes amendments to the strategic directions in the pWDP. The amendments were sought to SD-O4 and SD-O5 to better align with the intent of the provisions and give better effect to the CRPS and to the new NPS-HPL.

Urban Form and Development

- 25 The Regional Council works on urban development issues with territorial authorities across the region, including through engagement on draft district plan provisions, and district development, growth management and town centre strategies. The Council also lodges submissions on

publicly notified plan changes, where a plan change application raises issues relevant to the implementation of the CRPS. Since 2003, the Regional Council has worked collaboratively as a part of the Greater Christchurch Partnership¹ on planning and managing urban growth and development in Greater Christchurch.

- 26 The Regional Council is generally supportive of the proposed Urban Form and Development chapter and the pWDP as a whole.
- 27 The focus of the Regional Council's submission is to ensure that the CRPS is given effect to and to avoid any duplication or inconsistencies with the regional planning framework. This reflects the Regional Council's statutory responsibility regarding the implementation of the CRPS. Where necessary, submission points have been made in partial support of the proposed provisions, with amendments requested where these would achieve greater consistency or better give effect to the CRPS.

STATUTORY FRAMEWORK

- 28 Section 75(3) of the RMA requires that:

A district plan must give effect to –

- (a) any national policy statement; and*
 - (b) any New Zealand coastal policy statement; and*
 - (ba) a national planning standard; and*
 - (c) any regional policy statement.*
- 29 Relevant national and regional planning documents that the provisions relevant to Hearing Stream 1 of the pWDP must give effect to include the NPS-UD, the NPS-HPL and the CRPS.
- 30 Section 75(4) requires that a district plan must not be inconsistent with any applicable water conservation order or regional plan, including the Canterbury Land and Water Regional Plan (**LWRP**).

¹ The Greater Christchurch Partnership comprises the Canterbury Regional Council, Christchurch City Council, Selwyn District Council, Waimakariri District Council, Canterbury District Health Board, Te Rūnanga o Ngāi Tahu, and Waka Kotahi New Zealand Transport Agency.

31 I have not sought to repeat all the provisions contained in these national and regional planning documents. My evidence focusses on those I consider to be most relevant to the Urban Form and Development chapter of the pWDP and the submissions made by the Regional Council.

NPS-UD

32 The NPS-UD came into force in August 2020, replacing the NPS on Urban Development Capacity 2016. It applies to all local authorities that have all or part of an urban environment within their district or region (identified as Tier 1, 2 and 3 local authorities, informed by population size and growth rates), and to planning decisions by any local authority that affect an urban environment.

33 For the purposes of the NPS-UD, Christchurch is identified as a Tier 1 urban environment. The Canterbury Regional Council, Christchurch City Council, Waimakariri District Council and Selwyn District Council are Tier 1 local authorities.

34 The NPS-UD contains eight objectives and 11 policies. No objectives or policies are expressed as having priority over another.

35 Central to the NPS-UD is a focus on the achievement of well-functioning urban environments (Objective 1 and Policy 1). Policy 1 articulates a set of outcomes for local authorities to use when preparing plans and making decisions and sets direction for the intended outcomes of the NPS-UD.

36 Objective 2 is that planning decisions improve housing affordability by supporting competitive land and development markets.

37 Objective 7 is that local authorities have robust and frequently updated information about their urban environments and use it to inform planning decisions.

38 Relevant to these objectives is Policy 2, which requires that Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short, medium, and long term. In order to be 'sufficient' to meet expected demand for housing, the development capacity must be:

- a. Plan-enabled (i.e. in relation to the short term, zoned in an operative district plan; in relation to the medium term zoned in an operative or proposed district plan; in relation to the long term, zoned or identified for future urban use or intensification in a Future Development Strategy (**FDS**));²
- b. Infrastructure-ready (i.e. development infrastructure is available (short term), funded (medium term), or identified in a local authority's infrastructure strategy (long term));³
- c. Feasible and reasonably expected to be realised;⁴ and
- d. For Tier 1 and 2 local authorities, meet the expected demand plus the appropriate competitiveness margin.⁵

39 Additional obligations on Tier 1 local authorities under the NPS-UD include:

- To set housing bottom lines for the short to medium term and the long term in regional policy statements and district plans (Policy 7);
- To undertake quarterly monitoring of urban development indicators (Part 3, subpart 3, clause 3.9);
- To prepare a Housing and Business Development Capacity Assessment (Part 3, subpart 5); and
- To prepare a Future Development Strategy (Part 3, subpart 4).

40 Policy 6 sets out matters decision makers must have particular regard to when making planning decisions that affect urban environments. These matters include:

- a. the planned urban built form anticipated by RMA planning documents that have given effect to the NPS-UD;⁶

² NPS-UD 2020 Part 3, sub-part 1, clause 3.4(1).

³ NPS-UD 2020 Part 3, subpart 1, clause 3.4(3).

⁴ NPS-UD 2020 Part 3, subpart 5, clause 3.26.

⁵ NPS-UD 2020 Part 3, subpart 1, clause 3.2.

⁶ As well as that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes may detract from some amenity values but improve others, and that those changes to amenity values are not of themselves an adverse effect (Policy 6(b)).

- b. the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1);
 - c. any relevant contribution that will be made to meeting the requirements of the NPS-UD to provide or realise development capacity; and
 - d. the likely current and future effects of climate change.
- 41 The NPS-UD introduced a 'responsive planning framework', established by Objective 6, Policy 8 and Clause 3.8. Objective 6 requires that local authority decisions on urban development that affect urban environments are:
- a. integrated with infrastructure planning and funding decisions; and
 - b. strategic over the medium term and long term; and
 - c. responsive, particularly in relation to proposals that would supply significant development capacity.
- 42 The obligations set out above are key mechanisms to implement Objective 6, to ensure integration with infrastructure planning and funding decisions and that decisions that affect urban environments are strategic and provide Councils with the evidence base to be responsive.
- 43 Change 1 to Chapter 6 of the CRPS (discussed further below) is an example of this, where the housing capacity assessment (undertaken under the previous NPS-UDC) identified a potential shortfall in development capacity. Our Space 2018-2048 then identified locations for future urban growth and a change to the CRPS was promulgated in accordance with that document. Now the pWDP is required to implement the CRPS.
- 44 I discuss the NPS-UD further in my evidence in the context of the s42A officer's recommendations.

NPS-HPL

- 45 The NPS-HPL was gazetted on 19 September 2022 and came into effect on 17 October 2022. It contains one objective and nine policies.

- 46 The NPS-HPL requires the mapping of highly productive land (**HPL**).⁷ HPL includes land that is general rural zone or rural production zone and LUC 1, 2 or 3 (as identified in the New Zealand Land Resource Inventory). Land identified for future urban development must not be mapped as HPL.⁸
- 47 The mapping must be notified (for inclusion in a regional policy statement) by regional councils by October 2025.⁹ Until then, territorial authorities must still apply the policies of the NPS-HPL to land that has characteristics of HPL.¹⁰
- 48 In general, the NPS-HPL includes policies that avoid the urban rezoning, rezoning and development, and subdivision of highly productive land. Policies 5, 6 and 7 state that urban zoning, rezoning and development and subdivision of HPL must be “avoided”. Policy 8 states that HPL is protected from inappropriate use and development. Clause 3.7 states rezoning of HPL to rural lifestyle must be avoided.
- 49 However, there are exceptions. Clause 3.6 states Tier 1 and 2 Territorial Authorities (including WDC) may allow urban rezoning of HPL only if (in summary):
- Rezoning is required to provide sufficient development capacity to give effect to the NPS-UD; and
 - There are no other reasonably practicable and feasible options for providing at least sufficient development capacity within the same locality and market while achieving a well-functioning urban environment; and
 - The benefits of rezoning outweigh the long-term costs associated with the loss of HPL for land-based primary production (including both tangible and intangible values).
- 50 For the purposes of the NPS-HPL, the Regional Council and WDC are defined as Tier 1 territorial authorities.
- 51 To demonstrate that there are no other options to developing on HPL, councils must consider greater intensification in existing urban areas,

⁷ NPS-HPL, Policy 3 and clause 3.4(1).

⁸ NPS-HPL, Clause 3.4(2).

⁹ NPS-HPL, Clause 3.5(1).

¹⁰ NPS-HPL, Clause 3.5(7).

rezoning of land that is not HPL, and rezoning HPL that has a lower productive capacity.¹¹

- 52 Clause 3.8 states subdivision of HPL must be avoided unless:
- a. the proposed lots will retain overall productive capacity over the long term;
 - b. subdivision is on specified Māori land; or
 - c. subdivision is for infrastructure or defence facilities operated by New Zealand Defence Force, and there is a functional or operational need for the subdivision.
- 53 Clause 3.9 states inappropriate use and development of HPL (i.e. use that is not land-based primary production) is to be avoided unless at least one of the criteria listed in clause 3.9(2) are met.
- 54 Overall, in my view the policies in the NPS-HPL are very directive towards avoiding the urban rezoning of HPL and protecting it from inappropriate subdivision and use. The NPS-HPL ensures that there are multiple criteria to go through before rezoning can be considered, and a requirement to consider other options and areas for development rather than land classed as HPL.
- 55 Finally, there is an important link between the NPS-HPL and NPS-UD as the NPS-UD does provide for out of sequence and unplanned development. However, the direction of the NPS-HPL indicates that any out of sequence development can only occur on HPL land under very strict criteria.
- 56 I discuss the NPS-HPL further in my evidence in the context of the s42A officer recommendations.

Strategic growth planning in Greater Christchurch

- 57 The Regional Council has worked collaboratively as part of the Greater Christchurch Partnership for more than a decade on strategic settlement planning and urban growth and development issues in Greater Christchurch, including through the development of the Urban Development Strategy (**UDS**) 2007 (updated in 2016) and Our Space 2018-2048.

¹¹ Clause 3.6(2).

- 58 Our Space 2018-2048 updated the settlement pattern originally set out in the 2007 UDS and which underpins the planning framework outlined in Chapter 6 to the CRPS.
- 59 Our Space 2018-2048 identified that, while most of the growth expected to occur in Greater Christchurch to 2048 could be accommodated within existing urban environments, there was a need to identify additional greenfield areas for housing (**FDAs**) in Rolleston, Rangiora and Kaiapoi, to help address projected housing capacity shortfalls for Selwyn and Waimakariri Districts over the medium to long term.
- 60 Our Space included an action to progress a change to Chapter 6 of the CRPS at the earliest opportunity. This would enable Selwyn and Waimakariri District Councils to identify and / or rezone land within these areas as part of their district plan processes, to give effect to the requirement in the 2016 NPS-UDC¹² to ensure sufficient development capacity.
- 61 The FDAs identified through Our Space are located within the existing Projected Infrastructure Boundary (**PIB**) on Map A (of the CRPS), and are consistent with both the objectives and policies of the CRPS, and the long-term growth strategy set out in the UDS 2007 and 2016 update.
- 62 By directing future housing growth to development capacity already signalled by the PIB, Our Space 2018-2048 and Change 1 to the CRPS built on the work and extensive community input undertaken in developing the UDS and recovery processes that led to Chapter 6 of the CRPS, as well as subsequent growth and infrastructure planning undertaken by the district councils.
- 63 In July 2021 the Greater Christchurch Partnership published its updated Housing Capacity Assessment (**HCA**), in accordance with the requirements of the NPS-UD.¹³ The 2021 HCA provides an assessment of expected housing demand and the sufficiency of development capacity, to 2051. Table 3 within the HCA report shows that, with the inclusion of the FDAs identified through Our Space (and subsequently Change 1 to the CRPS), there is sufficient development capacity

¹² Our Space 2018-2048 was prepared as an FDS for Greater Christchurch under the NPS-UDC. However, Change 1 to Chapter 6 of the CRPS was progressed in accordance with the provisions of the NPS-UD.

¹³ Greater Christchurch Housing Development Capacity Assessment, 30 July 2021.

(including the required competitiveness margin) within Selwyn, Waimakariri and Christchurch City, to meet expected housing demand over the medium term (i.e. 2021 to 2031).

- 64 As noted above the NPS-UD requires plan-enabled capacity to be zoned in relation to the medium term and identified for future urban use in an FDS in relation to the long term. A spatial planning exercise has been initiated by the Greater Christchurch Partnership in conjunction with delivery of the Greater Christchurch 2050 Strategic Framework and the establishment of an Urban Growth Partnership with the Crown.
- 65 It is my understanding that the Greater Christchurch Spatial Plan will fulfil the FDS requirements under the NPS-UD. In this regard, it will provide the opportunity to comprehensively and strategically consider locations for future growth, including identifying the broad locations in which development capacity will be provided over the long term. The Spatial Plan is expected to be completed within the next two years, to inform the 2024 Long Term Plans as required by the NPS-UD.
- 66 This work will inform the review of the updated CRPS, which is currently scheduled in the Long-Term-Plan to be notified in 2024.

Canterbury Regional Policy Statement

- 67 The policy framework in the operative CRPS that is relevant to urban development issues is mainly found in Chapters 5 and 6. Some of the issues and objectives within Chapter 5 – Land Use and Infrastructure, apply across the entire Canterbury region, while others apply outside the Greater Christchurch area. For the Greater Christchurch area, the issues to be resolved, and the manner in which the objectives are to be implemented, are set out in Chapter 6 – Recovery and Rebuilding of Greater Christchurch. Part of the Waimakariri District lies within Greater Christchurch.
- 68 Objective 5.2.1 requires that development is located and designed to achieve consolidated, well designed and sustainable growth in and around existing urban areas as the primary focus for accommodating growth. Policy 5.3.1(1) applies outside of Greater Christchurch, and therefore applies to parts of the Waimakariri District and requires that any urban growth and rural residential development occurs in a form that

concentrates, or is attached to, existing urban areas and promotes a coordinated pattern of development.

- 69 Chapter 6 provides the resource management framework for earthquake rebuild and recovery in Greater Christchurch through to 2028. Its insertion was directed by the Minister for Canterbury Earthquake Recovery through the Land Use Recovery Plan 2013. Chapter 6 also implements the strategic direction provided in the Greater Christchurch Urban Development Strategy 2007.
- 70 On 28 May 2021, the Minister for the Environment approved Change 1 to Chapter 6 of the CRPS (**Change 1**) via a streamlined planning process. Change 1 implements actions in Our Space 2018–2048 and gives effect to the requirement in the NPS-UD for local authorities to provide at least sufficient development capacity to meet expected demand for housing and business land over the short, medium, and long term.
- 71 In summary, Change 1 amended Chapter 6 and Map A of the CRPS to identify FDAs within the existing PIB in Rolleston, Rangiora and Kaiapoi, and inserted associated policy provisions which enable land within these areas to be rezoned by the Selwyn and Waimakariri District Councils if required to meet their medium term (10 year) housing needs.¹⁴ Change 1 was made operative on 28 July 2021.
- 72 Chapter 6 is more directive than Chapter 5. Map A in Chapter 6 identifies the location and extent of urban development that will support recovery, rebuilding and planning for future growth and infrastructure delivery in Greater Christchurch. Significantly, all anticipated urban development is located within the PIB. Within the PIB, the policy framework in Chapter 6 provides for the development of land within existing urban areas, greenfield priority areas, and future development areas where the circumstances set out in Policy 6.3.12 are met, at a rate and in locations that meet anticipated demand and enables the efficient provision and use of network infrastructure.¹⁵ Urban development

¹⁴ Policy 6.3.12

¹⁵ Objective 6.2.2

outside of these identified areas is to be avoided, unless expressly provided for in the CRPS.¹⁶

- 73 However, simply because an area may be identified as an FDA under the CRPS provisions, this does not mean that it can automatically be developed. There are still other criteria that are required to be met (see Policy 6.3.12 of the CRPS), for example if the land that is in a high hazard area.
- 74 Other key relevant provisions in the CRPS include:
- a. Objective 6.2.1a, which is that at least sufficient development capacity for housing is enabled in Greater Christchurch in accordance with the targets set out in Table 6.1.
 - b. Objective 6.2.4, which prioritises the planning of transport infrastructure so that it maximises integration with priority areas and new settlement patterns. Policies 6.3.4 and 6.3.5 support this objective, and others, in respect of transport effectiveness and the integration of land use and infrastructure.
 - c. Objectives 6.2.5 and 6.2.6, and Policies 6.3.1 and 6.3.6, which relate to business land and commercial development, establish a hierarchy of commercial centres and seek that the existing network of centres is supported and maintained.
 - d. Policies 5.3.2 and 5.3.12, which are relevant to the management of versatile soils in the wider region.
- 75 I discuss these CRPS provisions further where relevant in the context of the s42A officer recommendations.

RECOMMENDATIONS IN THE S42A REPORT

Overarching and Part 1 matters

- 76 The Regional Council's submission on Overarching and Part 1 matters generally supported the pWDP in giving effect to the intent of the CRPS and the regional planning framework. The Council did however seek general amendments regarding several issues:

¹⁶ Objective 6.2.1 and Policy 6.3.1.

- That the pWDP give effect to Map A of the CRPS; and
- The certification process criteria for releasing land in the Kaiapoi future development area; and
- That the pWDP give better effect to Chapter 11 of the CRPS, particularly in relation to the high hazard areas in the coastal environment; and
- Definitions that relate to specific chapters

77 I agree with Mr Wilson's approach that where submissions for a particular topic have been made on other sections of the proposed plan, that these submissions should be reported on in the specific topic report. However, there are some topics that do not fit in just one chapter. For example, submissions regarding the NPS-HPL are to be discussed in the rural chapter report. It is my view that the NPS-HPL also applies to the Urban Form and Development chapter because of the interlinkages with the NPS-HPL and the NPS-UD regarding criteria outlining where development can occur.

78 Considering this, I would like to ensure that any consequential and subsequent amendments that result from future hearing streams are made to Part 1 of the pWDP where required.

Rautaki ahunga - Strategic Directions

79 The Council submitted in support of SD-O1, SD-O2, and SD-O6. Amendments were sought in respect of SD-O4 and SD-O5.

80 I generally support the recommendations of the S42A report author in the objectives listed above, subject to some matters which are further addressed below.

Objectives SD-O1, SD-O2, SD-O6

81 The Regional Council sought that SD-O1, SD-O2 and SD-O6 be retained as notified or that the original intent is preserved.

82 In response to submissions Mr Buckley has suggested amendments to SD-O1(1), SD-O2 (1), (2). No changes have been recommended to SD-O6.

83 I agree with the recommended changes to SD-O1 and SD-O6. However, I do not agree with the omission of the words 'existing character' in SD-

O2(2). In his report, Mr Buckley did not provide any reasons for deleting 'existing character' and it is my view that this wording is required as it is important that Canterbury's natural and physical resources affected by development are maintained. Policy 5.3.3 of the CRPS seeks to ensure that the natural character of an area is maintained or appropriately enhanced.

84 I consider that deleting the reference to recognising existing character in relation urban development would be contrary to the CRPS.

85 I do agree that the other changes recommended by Mr Buckley to SD-O2 are appropriate.

Objective SD-O4

86 The Regional Council sought that SD-O4 be amended to explicitly provide for the need to make appropriate use of soil which is valued for existing or foreseeable future primary production, or through further fragmentation of rural land to better reflect the CRPS and the NPS-HPL.

87 I agree with Mr Buckley's recommendation that the application of the CRPS and the introduction of the NPS-HPL is best addressed in the general objectives and policies for all Rural Zone and General Rural Zone chapters and that any consequential changes to SD-O4 can be considered in that report.

Objective SD-05

88 The Regional Council sought amendments to SD-O5 to particularly mention Papakāinga housing and marae to better align with the CRPS.

89 Mr Buckley recommended that no changes are required to SD-O5 and that instead, policies SPZ(KN)-P1, P2 and P3 enable papakāinga housing and marae to be developed in accordance with tikanga. He also states that they are provided for under SD-O5(4) and (6).

90 It is my view that the development of Papakāinga housing and marae does need to be mentioned in this objective to align with Policy 5.3.4 of the CRPS which particularly directs territorial authorities to recognise and provide for papakāinga housing and marae to enhance Rūnanga's ongoing relationship with their cultural land.

91 In my opinion the amendments sought by the Regional Council need to be included in the strategic directions sections as well as in SPZ (KN),

not only to meet the CRPS but also because the objectives set in the strategic directions chapter leads onto the more specific chapters in the pWDP.

Āhuatanga auaha ā tāone - Urban Form and Development

- 92 The Regional Council supported Objective UFD-O1, Policies UFD-P6 and UFD-P9 where the provisions were sought to be retained as notified or the original intent preserved. The Regional Council sought amendments to Policies UFD-P1, P2, P3, P5, P7, P8 and P10. These amendments were sought in order to clarify that the provisions are consistent with and give effect to the relevant higher order resource management documents, namely the CRPS.
- 93 I generally support the recommendations of the S42A report author on the amendments that have been sought by submitters. My evidence focuses on the recommendations that are important in giving effect to the CRPS. My evidence also addresses amendments sought in the Regional Council submission where the intent of the submission can be clarified in light of the comments and recommendations made in the S42A report.

Objective UFD-O1

- 94 The Regional Council's submission sought that UFD-O1 be retained.
- 95 I agree with the recommendations made by Mr Buckley in that the changes he has proposed are consistent with the CRPS. I agree that the updated numbers are required in order to reflect the updated housing capacity bottom lines (included through Change 1 to the CRPS). The addition of the words in the objective also continues to be consistent with the CRPS and aligns with the wording in Policy 2 of the NPS-UD.

Policy UFD-P1

- 96 The Regional Council's submission sought that UFD-P1 cross-reference the minimum net densities contained in the subdivision chapter. Mr Buckley stated that this suggested cross-referencing would result in inconsistent planning decisions as some development sites may have natural constraints that require lower densities. He also stated that Policy SUB-P5 refers to providing for a variety of sites with respect to the density for the residential zones, not the densities themselves.

- 97 I agree with Mr Buckley's view as UFD-P1 is a policy about density in residential zones, rather than densities. Policy SUB- P5 is about density of residential development.

Policy UFD-P2

- 98 The Regional Council's submission sought that UFD-P2 be amended to give effect to Chapter 6 of the CRPS. It particularly highlighted that the proposed policy should refer to Map A of the CRPS. As set out above, Map A identifies existing urban areas and priority areas for development for Greater Christchurch that was recommended through Our Space and then implemented through the CRPS. These areas are identified as being required to provide sufficient land zoned for urban purposes to meet housing capacity needs into the future.
- 99 Mr Buckley's recommendation was to reject the submission stating that in his view it is not necessary or appropriate for UFD-P2 to refer to Map A because the new development areas identified in the proposed plan implement Map A.
- 100 I disagree with Mr Buckley's recommendation. Policy 6.3.1 of the CRPS and Map A provide a clear coordinated land use and infrastructure framework. The CRPS also states that objectives, policies and rules must be added to district plans that give effect to Policy 6.3.1 (that specifically mentions the need to refer to Map A). If Map A is not implemented, then WDC and the Regional Council face further risk of fragmented land. Development outside of the areas identified in Map A is to be avoided unless expressly allowed in the CRPS.
- 101 I also consider it would make sense to refer to Map A for a variety of other reasons. One of the key reasons to refer to Map A rather than the Future Development Strategy (**FDS**) is that the CRPS map can only be changed through a Schedule 1 process, whereas an FDS can be amended through a Local Government Act process (in which public consultation is not mandatory). This means that while a future development strategy may be consistent with Map A of the CRPS when first implemented, it could be changed so that it is not consistent, and therefore a reference in the district plan to compliance with the FDS, would not give effect to the CRPS.
- 102 The reference to an FDS is also problematic. In my view the breadth of the definition of future development strategy means that is unclear as to

what exactly it refers to (for example, the definition does not require that this is the document required to be produced by the NPS-UD – any number of various WDC strategies or policies may meet the requirements of the definition). This lack of clarity is further reasoning as to why it should not be included within Policy UFD-P2. Map A in the CRPS provides the clarity that is required.

- 103 As worded currently, UFD-P2(2) enables residential development within Greater Christchurch outside of the areas identified in CRPS Map A and is therefore not consistent with the CRPS. Clarification was not provided by Mr Buckley in his S42A report as to the reasoning for this. It is my view that UFD-P2(2) needs clarification regarding where new residential development can occur within Greater Christchurch and outside of Greater Christchurch.
- 104 In order for UFD-P2(2) to give effect to Policy 6.3.1(4) of the CRPS, new urban activities within Greater Christchurch can only occur within existing urban areas or identified greenfield priority areas as shown on Map A, unless expressly allowed for in the CRPS.
- 105 The minimum necessary amendments required to align UFD-P2(2) with the CRPS would be to ensure that within Greater Christchurch any residential development outside of Map A is avoided, and outside of greater Christchurch that residential development is avoided unless the matters in clause 2 are met.
- 106 These two changes are required so that plan readers are clear about where residential development can occur within the Greater Christchurch Area and outside of Greater Christchurch.
- 107 Some further submitters disagree that Map A needs to be referred to, their reasons being that the NPS-UD allows for development outside of Map A. I note that developments outside of Map A may be allowed but only under very strict circumstances, and the NPS-HPL criteria reduces further this spread to HPL as identified in my earlier evidence regarding the statutory framework.
- 108 For the reasons set out above, it is my view that Map A is required to be referred to in Policy UFD-P2 in order to be consistent with the higher level planning documents.

- 109 Further clarification is also needed in relation to the issues I have set out above, especially as to whether Mr Buckley's intention to enable further residential development within Greater Christchurch in areas outside of Map A in clause 2 of UDF-P2.

Policy UFD-P3

- 110 The Regional Council's submission sought an amendment to Policy UFD-P3 to provide for rural residential development in the part of Waimakariri District that is within the Greater Christchurch area only where it has been identified in an adopted Rural Residential Development Strategy (**RRDS**) and is in accordance with CRPS Policy 6.3.9.
- 111 In his report, Mr Buckley states that Policy 6.3.9 of the CRPS only applies to the area inside Greater Christchurch and does not constrain large lot residential outside of Greater Christchurch area and that the RRDS identifies potential growth directions for existing large lot residential areas.
- 112 I agree with Mr Buckley regarding Policy 6.3.9 of the CRPS, however Policy UFD-P3 (2) does not specifically mention that this relates to outside of Greater Christchurch only. An amendment to UFD-P3 to specify that this policy applies to the area that is in outside of Greater Christchurch would clarify this further. Given this, I also have concerns regarding the extent to which this policy applies within Greater Christchurch (consistent with the concerns I have outlined above in relation to UFD-P2).

Policy UFD-P5

- 113 The Regional Council's submission sought an amendment to Policy UFD-P5 to ensure reference to the direction set out in Chapter 6 of the CRPS, especially with Policy 6.3.1(1) and Map A.
- 114 Policy UFD-P5 provides for the extension of existing industrial zones and the development of new industrial activities in areas identified in the Future Development Strategy or the Waimakariri District Development Strategy (**WDDS**). Mr Buckley states that the WDDS provides for some future mixed use and commercial development outside of the existing Greenfield priority areas. He also mentions that this aligns with the NPS-UD in enabling WDC to provide sufficient development capacity into the

future. He has recommended that there is no change to Policy UFD-P5, reasoning that the Future Development Strategy and the Waimakariri District Development Strategy were developed having taken into account Chapter 6 of the CRPS. I am unsure as to how the WDDS that was produced in 2018 can account for the CRPS that was last amended in 2021.

- 115 I do not agree with Mr Buckley's recommendations, and it is my view that the proposed Policy UFD-P5 does not give effect to Chapter 6 of the CRPS as future development is not based on the areas outlined in Map A of the CRPS. Instead, as currently proposed, the future development areas refer to the future development strategy and the WDDS which were published prior to the direction set out in the CRPS. As set out above, the recent and comprehensive strategic planning work that the Council has participated (and which is now reflected in Chapter 6 and Map A of the CRPS) is significant and directive regarding these areas. The reasons for my view are set out above in Policy UFD-P2.
- 116 In addition, Mr Buckley also provides comment in his report that no natural hazard assessments or geotechnical investigations have been undertaken on any of the Greenfield Priority Areas identified in Map A in the CRPS. From this comment I take that Mr Buckley has an expectation that the Regional Council is to provide this information to make sure that the land set aside is suitable for development.
- 117 Policy 6.3.12 is explicit that urban development should only be enabled within the FDAs where the effects of natural hazards are avoided or appropriately mitigated in accordance with the provisions in Chapter 11 (ref. Policy 6.3.12(6)).

Policy UFD-P6

- 118 The Regional Council's submission opposed UFD-P6 with no specific changes sought. However separate comments were made on the criteria for certification for new development areas in other submissions specific to that topic. In that submission, the Regional Council sought the strengthening of criteria for certification of land to ensure appropriate consideration is given to transport and natural hazards.

- 119 In his report, Mr Buckley has confirmed that the issue of land certification will be dealt with in the Future Development Area Section 42A report, which is to be heard in Stream 10, February 2024.
- 120 I note that paragraph 5 of Mr Buckley's report recognises that the Urban Form and Development chapter may be subject to consequential amendments based on submissions on other chapters and that the submissions on the issue of land certification will be dealt with in Hearing Stream 10.
- 121 The Regional Council may seek consequential changes to UFD-P6 as a result of its submission to be dealt with in Hearing Stream 10 regarding the appropriateness of Kaiapoi being part of that proposed certification process. It is my view that recommendations on UFD-P6 should not be finalised in advance of the hearings on Hearing Stream 10.

Policy UFD-P7 and UFD-P8

- 122 The Regional Council's submission sought to amend policies UFD-P7 and UFD-P8 to recognise the direction set out in Chapter 6 of the CRPS, particularly in relation to Map A and Policy 6.3.11 that sets out the monitoring and review process of development capacity.
- 123 In his report, Mr Buckley did not recommend any changes to the policies. It is my view that both policies should refer to any additional development taking place in the areas identified in Map A for the same reasons set out in my evidence relating to UFD-P2 (above).
- 124 Further, if there is a need for any additional areas for development beyond what is set out in Map A, Policy 6.3.11 of the CRPS sets out this process and should also be referred to in both proposed policies in order to give effect to the CRPS.

Policy UFD-P10

- 125 The Regional Council's submission sought that clarity be provided in UFD- P10 regarding what is meant by 'new development areas'. The submission also sought that the policy be amended to include that the loss of productive soils to new development areas should be avoided unless necessary.

- 126 In terms of clause 1, the Regional Council sought clarity about whether the exception proposed would apply to the Kaiapoi Future Development Area. Clause 2 also required clarity in that it is unclear whether it applies to any additional development areas identified through subsequent private plan changes.
- 127 In his report, Mr Buckley provided clarity on the points raised by the Regional Council. However, it seems as though in his report he thought that the Regional Council were asking for clarity regarding whether clause 1 only applied to Kaiapoi. The question that the Council required clarity on was whether clause 1 would apply to the Kaiapoi Future Development Area (among other Future Development Areas). From his evaluation, I understand that clause 1 would apply. I agree with this based on the current drafting of the policy.
- 128 Mr Buckley also addressed the clarity concerns of the Regional Council regarding whether UFD-P10(2) applies to both currently identified developments and any subsequent private plan change developments. In his report he stated that it applies to all new development areas, including private plan changes.
- 129 In line with my comments on UFD-P2 above, it is my view that in order to give effect to the CRPS, this policy should be amended to ensure that further development (within Greater Christchurch) occurs only within areas identified for future development on Map A of the CRPS.
- 130 The Regional Council's submission sought a final amendment to Policy UFD-P10, in that to give effect to Policy 5.3.12 of the CRPS and the NPS-HPL, urban development outside of the identified new development areas, as set out in Map A of the CRPS, should be avoided where highly productive soils are present. If not inserted into this Policy, the Regional Council recommended that a new policy could be inserted to address the loss of productive soils or provided for under P2, P3, P4 and P5.
- 131 Mr Buckley states in his report that the protection of highly productive land will be addressed in the S42A report for Rural zones and Hearing Stream 6.
- 132 The Regional Council may seek consequential changes to UFD-P10 as a result of its submission to be dealt with in Hearing Stream 6 regarding highly productive land. It is my view that recommendations on UFD-P10 should not be finalised in advance of the hearings on Hearing Stream 6.

CONCLUSION

- 133 In summary, I agree with Mr Wilson's recommendations regarding the Overarching Matters and that where submissions were made on matters that relate to other sections of the proposed plan, that they should be dealt with in those sections.
- 134 In regard to the Strategic Directions Chapter I agree with Mr Buckley's recommended changes to SD-O1 and SD-O6 as they align with the CRPS. I also agree that submissions focussing on the NPS-HPL are best dealt with in future reports.
- 135 I have suggested that some wording in SD-O2(2) needs to remain for consistency with the CRPS. In my view and to be consistent with the CRPS, specific reference needs to be made to papakāinga housing in SD-O5.
- 136 The majority of the Regional Council's submission points were focussed on the Urban Form and Development Chapter of the PWDP. I agree with the recommendations made by Mr Buckley regarding UFD-O1 and UFD-P1.
- 137 However, after reading Mr Buckley's report I remain concerned about there being no reference to Map A of the CRPS, which identifies the areas where future development can occur. In my amendments, I have sought that reference to Map A is inserted into UFD-P2 and UFD-P5, UFD-P7, UFD-P8 and UFD-P10. I also have concerns regarding clarity in UFD-P2 and UFD-P3 specifically in relation to the identification of areas where development can and cannot occur.

Dated this 1st day of May 2023



Joanne Mitten

Attachment 1 – Amendments sought through the Regional Council submission.

Suggested amendments in **black and bold**, additions underlined and deletions with a ~~strike through~~.

SD – Rautaki ahunga – Strategic Directions chapter			
Provision	Support or oppose	Decision requested	Comments
SD-O2 Urban Development	Amend	<p>Amend Objective SD-O2 as follows:</p> <p>Urban development and <u>infrastructure</u> that:</p> <ol style="list-style-type: none"> 1. is consolidated and integrated with the <u>well-functioning urban environment</u> centres; 2. that recognises existing character, <u>planned urban form</u> and <u>amenity values</u>, and is attractive and functional to residents, businesses and visitors; 3. utilises the <u>District Council's</u> reticulated <u>wastewater system</u>, and potable <u>water supply</u> and <u>stormwater infrastructure</u> where available; 4. provides a range of housing opportunities, focusing new <u>residential activity</u> within existing towns, and identified development areas in Rangiora and Kaiapoi, in order to achieve the housing bottom lines in <u>UFD-O1</u>; 5. supports a hierarchy of urban centres, with the <u>District's</u> main centres in Rangiora, Kaiapoi, Oxford and Woodend being: <ol style="list-style-type: none"> a. the primary centres for <u>community facilities</u>; b. the primary focus for retail, <u>office</u> and other <u>commercial activity</u>; and 	Keep the words 'existing character' for consistency with the CRPS as outlined in evidence.

		<p>c. the focus around which residential development and intensification can occur.</p> <p>6. provides opportunities for business activities to establish and prosper within a network of business and industrial areas zoned appropriate to their type and scale of activity and which support district self-sufficiency;</p> <p>7. provides people with access to a network of spaces within urban environments for open space and recreation;</p> <p>8. supports the transition of the Special Purpose Zone (Kāinga Nohoanga) to a unique mixture of urban and rural activities reflecting the aspirations of Te Ngāi Tūāhuriri Rūnanga;</p> <p>9. provides limited opportunities for Large Lot Residential development in identified areas, subject to adequate infrastructure; and</p> <p>10. recognise and support Ngāi Tūāhuriri cultural values through the protection of sites and areas of significance to Māori identified in SASM-SCHED1.</p>	
SD-O4 Rural land	Amend	This will be dealt with in Hearing Stream #6	
SD-O5 Ngāi Tahu mana whenua/Te Ngāi Tūāhuriri Rūnanga	Amend	<p>Amend Objective SD-O5 as follows:</p> <p>Ngāi Tahu mana whenua/Te Ngāi Tūāhuriri Rūnanga</p> <p>Te Ngāi Tūāhuriri Rūnanga's role in the management of natural and physical resources is recognised, so that:</p> <p>1. Ngāi Tūāhuriri's historic and contemporary connections, and cultural and spiritual values,</p>	Adding the proposed words will mean the objective gives effect to the CRPS.

		<p>associated with the land, water and other taonga are recognised and provided for;</p> <ol style="list-style-type: none"> 2. the values of identified sites and areas of significance to Ngāi Tūāhuriri are protected; 3. Ngāi Tūāhuriri can retain, and enhance access to sites of cultural significance; 4. Māori land is able to be occupied and used by Ngāi Tūāhuriri for its intended purposes, including the development of Papakāinga housing and marae and to maintain their relationship with their ancestral land; 5. recognised customary rights are protected; 6. Ngāi Tūāhuriri are able to carry out customary activities in accordance with tikanga; and 7. Te Ngāi Tūāhuriri Rūnanga are able to actively participate in decision-making and exercise kaitiakitanga. 	
UFD – Āhuratanga auaha ā tāone – Urban form and development			
Provision	Support or oppose	Decision requested	Comments
UFD-P2 Identification/location of new Residential Development Areas	Amend	<p>Amend Policy UFD-P2 as follows:</p> <p>Identification/location of new Residential Development Areas</p> <p>In relation to the identification/location of residential development areas:</p> <ol style="list-style-type: none"> 1. residential development in the new Residential Development Areas at Kaiapoi, Northeast Rangiora, 	The amendments will ensure the Policy is consistent with the CRPS and the NPS-HPL.

		<p>South East Rangiora and West Rangiora is located to implement the urban form identified in <u>Map A of the CRPS and the Future Development Strategy;</u></p> <p>2. <u>new residential development in the area covered by Map A of CRPS outside of the New Development Areas at Kaiapoi, Northeast Rangiora, South East Rangiora and West Rangiora is otherwise avoided;</u></p> <p>3. for new Residential Development Areas <u>outside of the area covered by Map A of the CRPS, other than those identified by (1) above, avoid residential development unless located so that</u> they:</p> <ol style="list-style-type: none"> a. occur in a form that concentrates, or are attached to, an existing urban environment centres and promotes a coordinated pattern of development; b. occur in a manner that makes use of existing and planned transport and three waters infrastructure, or where such infrastructure is not available, upgrades, funds and builds infrastructure as required; c. have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; d. concentrate higher density residential housing in locations focusing on activity nodes such as key activity centres, schools, public transport routes and open space; e. take into account the need to provide for intensification of residential development while maintaining appropriate levels 	
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		<p>of amenity values on surrounding sites and streetscapes;</p> <p>f. are informed through the development of an ODP;</p> <p>g. supports reductions in greenhouse gas emissions; and</p> <p>h. are resilient to natural hazards and the likely current and future effects of climate change as identified in SD-O6;’ and</p> <p>i. <u>protect highly productive land</u></p>	
<p>UFD-P3 Identification/location and extension of Large Lot Residential Zone areas</p>	<p>Oppose in part</p>	<p>Identification/location and extension of Large Lot Residential Zone areas</p> <p>In relation to the identification/location of Large Lot Residential Zone areas:</p> <ol style="list-style-type: none"> 1. new Large Lot Residential development is located in the Future Large Lot Residential Zone Overlay which adjoins an existing Large Lot Residential Zone as identified in the RRDS and is informed through the development of an ODP; 2. new Large Lot Residential development, other than addressed by (1) above, is located so that it: <ol style="list-style-type: none"> a. occurs in a form that is attached to an existing Large Lot Residential Zone or Small Settlement Zone and promotes a coordinated pattern of development; b. is not located within an identified Development Area of the District's main towns of Rangiora, Kaiapoi and Woodend identified in the Future Development Strategy Map A of the CRPS; 	<p>Amended to be consistent with the CRPS and to refer to Map A</p>

		<p>c. is not on the direct edges of the District's main towns of Rangiora, Kaiapoi and Woodend, nor on the direct edges of these towns' identified new development areas as identified in Map A of the CRPS the Future Development Strategy;</p> <p>d. occurs in a manner that makes use of existing and planned transport infrastructure and the wastewater system, or where such infrastructure is not available, upgrades, funds and builds infrastructure as required, to an acceptable standard; and</p> <p>e. is informed through the development of an ODP.</p>	
UFD-P5 Identification/location and extension of Industrial Zones	Amend	<p>Identification/location and extension of Industrial Zones</p> <p>Provide for the extension of existing Industrial Zones and locate and develop new industrial activities to implement the urban form identified in the Future Development Strategy or WDDS or Map A of the CRPS.</p>	Amend to give effect to CRPS Map A.
UFD-P7 Mechanism to provide additional Commercial and Mixed Use Zones	Amend	<p>Mechanism to provide additional Commercial and Mixed Use Zones</p> <p>If proposed, ensure any plan change to create new, or expanded existing Commercial and Mixed Use Zones:</p> <ol style="list-style-type: none"> 1. improve commercial self-sufficiency within the town and the Waimakariri District; 2. are commensurate to the population growth forecast for the town subject to the plan change; 	Amend to give effect to CRPS Map A.

		<ol style="list-style-type: none"> 3. consider and address any adverse effects that might undermine other town centres and local centres in the District; and 4. address any development capacity shortfall as identified in the Future Development Strategy or WDDS 5. is informed through the development of an ODP. 	
UFD-P8 Mechanism to provide additional Industrial Zones	Amend	<p>Mechanism to provide additional Industrial Zones</p> <p>If proposed, ensure any plan change to create new, or expanded existing Industrial Zones:</p> <ol style="list-style-type: none"> 1. manages adverse effects at the interface between Industrial Zones and arterial roads, Rural Zones, Residential Zones and Open Space and Recreation Zones, through methods such as building setbacks and landscaping; 2. provides for development of greenfield areas in a manner aligned with the delivery of infrastructure, including upgrades to infrastructure, to avoid adverse effects on the capacity and efficiency of infrastructure serving these areas; and 3. locates new Industrial Zones in locations adjacent to existing urban environments where it can be efficiently serviced by infrastructure. 4. is informed through the development of an ODP. 5. <u>Is in accordance with the areas set out in Map A of the CRPS.</u> 	Amend to give effect to CRPS Map A.
UFD-P10 Managing reverse sensitivity	Amend	<p>Managing reverse sensitivity effects from new development</p>	Amend to give effect to Map A and the NPS-HPL.

<p>effects from new development</p>		<p>Within currently identified and future Residential Zones and new development areas in Rangiora and Kaiapoi:</p> <ol style="list-style-type: none"> 1. avoid residential activity that has the potential to limit the efficient and effective operation and upgrade of critical infrastructure, strategic infrastructure, and regionally significant infrastructure, including avoiding noise sensitive activities within the Christchurch Airport Noise Contour, unless within an existing Residential Zone; 2. minimise reverse sensitivity effects on primary production from activities within new development areas through setbacks and screening, without compromising the efficient delivery of new development areas; and 3. <u>avoid urban development outside of the identified new development areas, as set out in Map A of the CRPS, where highly productive soils are present.</u> 	<p>Amendment will help to clarify for current identified areas and any future areas that may arise from plan changes.</p>
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From: [Regional Planning](#)
To: [Audrey Benbrook](#)
Cc: [Joanne Mitten](#)
Subject: Waimakariri District Plan Review - Hearing Stream 1 - CRC Evidence
Date: Wednesday, 3 May 2023 11:34:51 AM
Attachments: [0.png](#)
[Statement of Evidence of Joanne Mitten on behalf of CRC - Hearing Stream 1 \(FINAL\) \(003\).docx](#)

Caution: [THIS EMAIL IS FROM AN EXTERNAL SOURCE] DO NOT CLICK links or attachments unless you recognise the sender email address and know the content is safe.

Kia ora Audrey

It has come to our attention that the Statement of Evidence of Joanne Mitten that we filed on Monday had a couple of formatting errors in the document. The Statutory Framework heading was attached to the paragraph that should have been below (paragraph 28), and there was a paragraph number missing on paragraph 112 and the next heading had moved up a line and was attached to the end of this same paragraph instead of hanging below.

I have now amended these mistakes and **attach** this version of the Evidence to this email. Is there any way that our evidence can be updated on the website? No wording has been changed just the formatting errors which make it harder to read and correctly reference the paragraphs within our evidence.

Please let me know if this is possible, if you have any questions feel free to call me. We do apologise for the inconvenience caused.

Kind regards

Josephine Laing
m: 021872284

Regional Planning

Environment Canterbury

Regional.Planning@ecan.govt.nz



PO Box 345, Christchurch 8140
Customer Services: 0800 324 636
24 Hours: 0800 76 55 88
ecan.govt.nz

