

## Appendix 4 & 5

### APPENDIX 4

#### NATIONAL POLICY STATEMENTS AND NATIONAL ENVIRONMENTAL STANDARDS

*Appendix 5 begins at page 5*

##### National Environmental Standards

The National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (NESCS) is the only NES applicable to the proposal. This controls activities on land on which any activity or industry on the Ministry for the Environment's Hazardous Activities and Industries List (HAIL) is being undertaken, has been undertaken, or more likely than not is, or has been, undertaken on it.

A PSI has been undertaken by Tonkin + Taylor. The PSI advises:

- a) The site is not recorded on Environment Canterbury's Listed Land Use Register.
- b) The existing dwelling and ancillary buildings are, however, clad in cement sheet building materials that could be an asbestos containing material.
- c) There are also numerous vehicles and vehicle parts (including batteries) in the vicinity of the buildings. Small areas of oil staining were noted.
- d) Potential contaminants of concern are asbestos, metals, hydrocarbons, oils, and pesticide residues from historic pastoral activities.
- e) Given the presence of existing buildings, a Detailed Site Investigation cannot occur until these have been removed. Tonkin + Taylor recommend that soil sampling is undertaken immediately following demolition of buildings, and also prior to bulk earthworks. The applicant agrees to this.

Given a Detailed Site Investigation has not been provided at the time of this application, resource consent is required for a **discretionary activity** under Regulation 11 of the NESCS.

##### National Policy Statements

The National Policy Statement on Urban Development 2020 (updated May 2022) (NPSUD) seeks to ensure that towns and cities in New Zealand are well-functioning urban environments that meet the changing needs of communities. It seeks to provide for growth "up" (i.e. increased building heights) and "out" (expansion of townships) in locations that have good access to services, public transport networks and infrastructure.

The NPSUD has been discussed and assessed in both the Urban Design evidence and the Economic evidence. These reports have been relied upon in assessing the objectives and policies of the NPSUD.

The assessment table below demonstrates that the proposal is entirely consistent with the NPSUD.

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National Policy Statement on Urban Development 2020 (updated May 2022)	
Provision	Assessment
Objectives	
<b>Objective 1</b> New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	<b>Consistent</b> The proposal is designed to contribute to the development of Kaiapoi as a well-functioning urban environment. It builds on an existing residential neighbourhood in a location which is the subject of high demand for housing but with a constrained housing supply.
<b>Objective 2</b> Planning decisions improve housing affordability by supporting competitive land and development markets.	<b>Consistent</b> This application provides the opportunity for consent to be granted to enable residential development to assist with easing supply constraint, therefore improving affordability.
<b>Objective 4</b> New Zealand's urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.	<b>Consistent</b> The proposal will provide for residential accommodation for the older population within an existing urban environment.
<b>Objective 5</b> Planning decisions relating to urban environments, and FDSs, take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).	<b>Consistent</b> The proposal takes into the account the principles of the Treaty of Waitangi as outlined in the application, and through consultation with
<b>Objective 6</b> 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.	<b>Consistent</b> The proposal is in accordance with this objective as it is an urban development in an area that is well-integrated with infrastructure planning and funding decisions. It is an area identified for future urban development in both the PWDP and CRPS and will provide significant development capacity, as outlined in the Economics Assessment, to respond to the high demand for additional capacity in the District.
<b>Objective 8</b> New Zealand's urban environments: (a) support reductions in greenhouse gas emissions; and (b) are resilient to the current and future effects of climate change.	<b>Consistent</b> The location and layout of the proposal, in close proximity to the Kaiapoi Town Centre and public transport, along with the provision of a well-integrated network of pedestrian and cycle paths, is anticipated

	<p>to assist in encouraging alternative transport modes that support reductions in greenhouse gas emissions.</p> <p>The design of the site has considered climate change in the design of overland flow paths which will carry flood flows, finished floor levels, and the stormwater management system.</p>
<b>Policies</b>	
<p><b>Policy 1</b></p> <p>Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:</p> <ul style="list-style-type: none"> <li>(a) have or enable a variety of homes that: <ul style="list-style-type: none"> <li>(i) meet the needs, in terms of type, price, and location, of different households; and</li> <li>(ii) enable Māori to express their cultural traditions and norms; and</li> </ul> </li> <li>(b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and</li> <li>(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and</li> <li>(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and</li> <li>(e) support reductions in greenhouse gas emissions; and</li> <li>(f) are resilient to the likely current and future effects of climate change.</li> </ul>	<p><b>Consistent</b></p> <p>As above, the proposal is designed to contribute to the development of Kaiapoi as a well-functioning urban environment. It builds on an existing residential neighbourhood in a location which is the subject of high demand for housing but with a constrained housing supply.</p>
<p><b>Policy 2</b></p> <p>Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.</p>	<p><b>Consistent</b></p> <p>An Economic Assessment prepared by Insight Economics (<b>Appendix Four</b>) addresses this matter concluding that the proposal will improve the development capacity for residential development, meeting the needs of a growing older population.</p>
<p><b>Policy 6</b></p> <p>When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters:</p>	<p><b>Consistent</b></p> <p>The proposal will be integrated into an existing urban environment that will further promote a well-functioning environment.</p>

<p>(a) the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement</p> <p>(b) (b) that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes:</p> <p>(i) may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and</p> <p>(ii) are not, of themselves, an adverse effect</p> <p>(c) the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1)</p> <p>(d) any relevant contribution that will be made to meeting the requirements of this National Policy Statement to provide or realise development capacity</p> <p>(e) the likely current and future effects of climate change.</p>	<p>While the site has a rural zoning, both the CRPS and the PWDP anticipate future urbanisation at this site. Therefore, while there will be loss of rural amenity and character, this is inevitable.</p> <p>Furthermore, the surrounding activities are non-rural in nature and therefore the environment in which the site is located is a residential environment. This further diminishes any rural character.</p> <p>It builds on an existing residential neighbourhood in a location which is the subject of high demand for housing but with a constrained housing supply, particular for older people.</p>
<p><b>Policy 8</b></p> <p>Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is:</p> <p>(a) unanticipated by RMA planning documents; or</p> <p>(b) out-of-sequence with planned land release.</p>	<p><b>Consistent</b></p> <p>As above, the proposal is designed to contribute to the development of Kaiapoi as a well-functioning urban environment. It builds on an existing residential neighbourhood in a location which is the subject of high demand for housing but with a constrained housing supply.</p>

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### APPENDIX 4

#### ASSESSMENT OF THE PROJECT AGAINST LOCAL AND REGIONAL PLANNING DOCUMENTS

*The following assessment is an extract from planning evidence prepared by Mark Allan, Director – Environment and Planning at Aurecon.*

#### Canterbury Regional Policy Statement

- 1 The CRPS identifies the significant resource management issues facing the region, and sets out objectives, policies and methods to resolve these. The CRPS provisions of relevance to the Proposal are those contained in Chapter 6 (Recovery and Rebuilding of Greater Christchurch) and Chapter 11 (Natural Hazards). While Chapter 5 applies to the entire region, the CRPS acknowledges that many issues associated with urban and rural residential development tend to be concentrated in the Greater Christchurch area, and for this reason the corresponding provisions are set out in Chapter 6 and take precedence.
- 2 My assessment of the Proposal against these provisions is summarised below. For completeness, I record my view that the Proposal is either consistent with, or not engaged by, the remaining chapters of the CRPS.
- 3 As illustrated in Attachment 1, the Site is in the Greater Christchurch sub-region and located within the identified Projected Infrastructure Boundary and a Future Development Area (**FDA**), the only such notation at Kaiapoi. Change 1 to the CRPS (operative May 2021) amended Map A to introduce the FDAs in response to an identified shortfall in housing development capacity.
- 4 As a general observation, I note that the drafting approach adopted in Change 1 to include FDA in Chapter 6 is one of cross-referencing to other CRPS objectives and policies that apply to Greenfield Priority Areas (**GPA**). For the most part this works adequately, however problems arise where the cross-referenced policy refers to GPAs but was not updated by Change 1 to refer to also to the FDAs. For example, Policy 6.3.12(3), which is the pivotal policy enabling urban development in the FDAs, refers to Policy 6.3.5 (Integration of land use and infrastructure), however Policy 6.3.5(4), which includes the Kaiapoi exemption for development within the 50 dBA, refers to GPAs but does not mention FDAs. Similarly, Policy 6.3.12(6) refers to objectives and policies in Chapter 11 (Natural Hazards), however Policy 11.3.1(6), which includes exemptions for new development within high hazard areas in Greater Christchurch, refers to areas identified as a GPA on Map A but does not mention FDAs.

- 5 The terminology and corresponding definitions for greenfield land also raises some ambiguity that, I contend, unnecessarily complicates the otherwise enabling intention of the Future Development Areas. For example, “residential greenfield area” (as used in Policy 6.3.5(4)<sup>1</sup>) and “greenfield area” (as used in Policy 6.3.7(6)<sup>2</sup>) are not defined in the CRPS, whereas “Greenfield Priority Areas” and “greenfield development” are, with reference to the areas identified on Map A.
- 6 In the absence of a definition in the CRPS of “residential greenfield area” or “greenfield area”, the Oxford Dictionary defines such as “an area of land that has not yet had buildings on it, but for which building development may be planned”. This is exactly what the Future Development Areas identified on Map A and the Kaiapoi Development Area in the PWDP are. In this regard, the Proposal could be said to provide for new development within a “residential greenfield area identified for Kaiapoi”, or addressing housing affordability “by providing sufficient greenfield land to meet housing demand”. On this basis, the Proposal would be exempt from the ‘avoidance’ clause in Policy 6.3.5(4).
- 7 Given the circumstances in which Change 1 added the FDAs to Map A and introduced Policy 6.3.12 for the express purpose of providing for the rezoning of land within the FDAs as a direct response to projected shortfalls in feasible residential development capacity, the cross-referencing and terminology issues I have highlighted would appear to be drafting oversights rather than intentional.
- 8 Another observation is the CRPS’s response to addressing the issue of housing affordability, which is a fundamental objective of the NPS UD. I note that Policy 6.3.7(6)<sup>19</sup> is the only instance that housing affordability is mentioned in the CRPS. To my mind the contrast in priority given to housing affordability between the CRPS and the NPS-UD<sup>3</sup> illustrates that the CRPS does not implement (or fully implement) the NPS-UD. Indeed, it is quite telling to note that housing affordability is not mentioned in Policy 6.3.11 (Monitoring and review), the related explanatory text or any other part of the CRPS.

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<sup>1</sup> “Recovery of Greater Christchurch is to be assisted by the integration of land use development with infrastructure by ...4. Only providing for new development that does not affect the efficient operation, use, development, appropriate upgrading and safety of existing strategic infrastructure, including by avoiding noise sensitive activities within the 50dBA Ldn airport noise contour for Christchurch International Airport, unless the activity is within an existing residentially zoned urban area, **residential greenfield area identified for Kaiapoi**, or residential greenfield priority area identified in Map A (page 6-28) and enabling commercial film or video production activities within the noise contours as a compatible use of this land;...”; Policy 6.3.5, CRPS

<sup>2</sup> “In relation to residential development opportunities in Greater Christchurch:...6. Housing affordability is to be addressed by providing sufficient intensification and **greenfield land** to meet housing demand,...”; Policy 6.3.7, CRPS.

<sup>3</sup> vis-à-vis Objective 2 (planning decisions improve housing affordability), Clause 3.9 (monitoring requirements) and Clause 3.23 (analysis of how planning decisions affect housing affordability), NPS UD

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- 9 Further lending support to this conclusion is the absence of any responsive planning criteria in the CRPS as required by Clause 3.8 of the NPS-UD, and the explanatory text to Policy 6.3.12 which states that *"...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. Addressing longer term needs will be further considered as part of a comprehensive review of the Canterbury Regional Policy Statement scheduled to commence in 2021."* It is now 2024 and a review of the CRPS has yet to be notified.
- 10 I have identified Policy 6.3.12 as pivotal to the enabling of development within FDAs. It states *"Enable urban development in the Future Development Areas identified on Map A, in the following circumstances..."*. The accompanying explanatory text is also noteworthy, where it explains (second paragraph, my emphasis) that *"The Future Development Areas are important in providing certainty that additional residential development capacity is available to accommodate population and household growth over the medium and long term."* If development within FDAs cannot occur due to the 50 dBA noise contour (Policy 6.3.5(4)) or the high hazard area (Policy 11.3.3(6)), then the purpose of FDAs (i.e., certainty of additional development capacity) cannot be realised.
- 11 Further, my reading of the last paragraph of the explanatory text is that a key aspect of Policy 6.3.12 is to ensure that *"...development takes place in a coordinated way and the staging and timing of future development is managed to ensure transport and other infrastructure planning is integrated with the provision of additional housing."* Most of the criteria (sub-clauses) in Policy 6.3.12 are directed towards achieving this outcome.
- 12 For the above reasons, and against the backdrop of the NPS UD directive that at least sufficient development capacity is provided at all times to meet expected demand for housing, I consider the Proposal can be said to fall within the exemptions provided by 6.3.5(4) and 11.3.1(6) in respect of greenfield development identified on Map A that is under the airport noise contour and in a high hazard area, respectively.
- 13 Should the Panel reach a different conclusion that the exemptions are not applicable, I consider the Proposal complies with Policies 6.3.5(4) and 11.3.1(6), because the specific issues that these policies seek to avoid (i.e., reverse sensitivity and high flood risk) will not occur for the reason that the effects of the Proposal on airport operations and high flood hazard will be minimal, as demonstrated by Momentum's technical evidence prepared for Stream 10A and Stream 12E. It follows that I do not consider any material harm would arise from the Proposal regarding these specific issues.

- 14 And in the event the Panel disagree with this second interpretation, I consider the Proposal qualifies under the responsive planning decision regime provided by the NPS-UD (Policy 8 and Clause 3.8) because it will provide for significant additional housing capacity and contribute to a well-functioning urban environment. On this basis, the Proposal is able to be approved even if the Panel considers that urban development in this location is not explicitly anticipated by the CRPS.
- 15 In all other respects I consider the Proposal will ensure residential development that contributes to significantly to residential capacity and occurs in a managed way that integrates with the established urban form and infrastructure and transport networks at Kaiapoi. Overall, I consider the Proposal achieves consistency with Chapter 6 for the following reasons:
- (a) it will provide for residential development in a specified spatial area (FDA) at Kaiapoi in a way that will maintain the established urban character and amenity, protect people from unacceptable flood risk, enhance indigenous biodiversity, and not adversely affect the efficient operation of the Christchurch Airport (Objective 6.2.1, Policy 6.3.5);
  - (b) it will achieve a consolidated urban form and settlement pattern, avoid unplanned expansion of the urban area at Kaiapoi, provide for the development of a FDA to meet anticipated demand and enable the efficient use of network infrastructure, encourage sustainable and self-sufficient growth of Kaiapoi, and give effect to the principles of good urban design (Objective 6.2.2, Policy 6.3.2);
  - (c) development of the Site will be undertaken in accordance with an ODP that has been prepared in accordance with the relevant criteria under Policy 6.3.3;
  - (d) Mr Carr's transport evidence demonstrates that the Proposal will contribute to an efficient and effective transport network (Policy 6.3.4);
  - (e) it will deliver greenfield residential development in accordance with Map A that achieves prescribed residential net densities and contributes to housing affordability (Policy 6.3.7); and
  - (f) it is enabling of development in a FDA that satisfies the criteria under Policy 6.3.12, specifically it responds to an identified need for further feasible development capacity through the zoning of land (1.), promotes the efficient use of urban land and supports the settlement pattern (2.), is aligned with the provision and protection of infrastructure (including Christchurch Airport) (3.), will occur in accordance with the ODP (4.), and the effects of flooding hazard can be appropriately mitigated (5.).



- 16 Overall, it is my view that the Proposal is consistent with providing a consolidated urban form and settlement pattern and sustainable growth at Kaiapoi, will meet the general intent for managed urban growth in the Greater Christchurch area, and will provide much-needed housing development capacity. The assessment demonstrates that the Proposal is broadly consistent with the key outcomes anticipated for FDA by the CRPS.

## **PWDP**

- 17 The Proposal is assessed against the objectives of the PWDP in the Section 32AA Evaluation. Based on that assessment, I consider the Proposal is generally consistent with the objectives of the PWDP relevant to MRZ-enabled development of the Site:
- (a) it will improve the quality of the natural environment in respect of the natural features and potential habitat identified on the Site (SD-O1 Natural environment, ECO-O1 Ecosystems and indigenous biodiversity, NATC-O2 and -O3 Natural character and freshwater bodies);
  - (b) it enables development that will be consolidated and integrated with Kaiapoi's urban environment and provide a range of housing opportunities within an identified development area (SD-O2 Urban development);
  - (c) it will provide good integration and connectivity with active transport modes and commercial, community and recreational facilities in Kaiapoi, convenient access to public transport networks, and will not affect the efficient and effective operation of strategic infrastructure (SD-O3 Energy and infrastructure);
  - (d) being within an identified residential development area, the Site is not required to be managed for productive rural activities, and MRZ-enabled development represents more efficient utilisation of the land resource than RLZ (SD-O4 Rural land);
  - (e) the values of identified sites and areas of significance to Ngāi Tūāhuriri will be recognised and protected through the provisions of the PWDP and the consenting process (SD-O5 Ngāi Tahu mana whenua/Te Ngāi Tūāhuriri Rūnanga);
  - (f) the ground conditions and flooding hazard can be readily managed through detailed design to ensure natural hazard risk is appropriately mitigated and acceptable (SD-O6 Natural hazards and resilience, NH-O1 Natural Hazards);
  - (g) it will provide sufficient feasible development capacity to meet demand for housing (UFD-O1 Urban form and development);

- (h) MRZ-enabled development of the Site can be effectively and efficiently serviced without compromising existing infrastructure (EI-O2 Energy and infrastructure);
- (i) it does not compromise the safety, resilience or efficiency of the transport network, and encourages multi modal transport choices (TRAN-O1 Transport);
- (j) the requirement for future subdivision to comply with the ODP and PWDP provisions relating to the subdivision and land development activities in the MRZ will deliver an integrated pattern of land use, development and urban form (SUB-O1 Subdivision design);
- (k) it will achieve sustainable residential growth that provides more and varied housing in an appropriate location close to amenities, and that is responsive to growth, community and district needs (RESZ-O1 Residential growth, location and timing, MRZ-O1 Provision of medium density housing); and
- (l) the residential upzoning is anticipated in the Kaiapoi Development Area and will not impact on the predominant character of the rural environment beyond the Site (RURZ-O1 Rural Environment).

18 I have also reviewed the associated policies that support these objectives. In the interests of brevity, rather than working through a blow-by-blow account of each policy, I record that I have reached the same conclusion as above, and consider the Proposal is generally consistent with the supporting policies.

## **WDDS**

19 The WDDS guides the District's anticipated residential and business growth over the next 30 years (2018-2048). It identifies a need for 17ha of additional retail/commercial land in Rangiora and Kaiapoi<sup>4</sup> and identifies northeast Kaiapoi (including the Site) as a future direction for residential growth (Figure 1E, Attachment 1). Relevantly from the WDDS, *"new growth directions take into account the areas of unacceptable natural hazard risk", "new growth areas to connect into existing sewer and water networks", "stormwater levels of service designed to*

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<sup>4</sup> WDDS, page 5

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*meet increased performance requirements” and “existing strategic infrastructure is considered, including Christchurch International Airport’s proposed review of the airport noise contours”<sup>5</sup>.*

- 20 The WDDS notes that providing for growth around Kaiapoi would maximise the efficiency of infrastructure, services, amenities and transport, and create critical mass for business and retail. Kaiapoi will remain the second largest town in the District (behind Rangiora) and retain its existing character. These are all elements of the WDDS that the Proposal will deliver on.

### **Mahaanui Iwi Management Plan**

- 21 The Site is within the takiwā of Te Ngāi Tūāhuriri Rūnanga. Natural resources (water, mahinga kai, indigenous flora and fauna, cultural landscapes and land) are taonga to manawhenua, and integral to the history and identity of mana whenua. The protection of sites and areas of significance to Māori for the benefit of current and future generations is essential to the cultural identity of Kaiapoi and Greater Christchurch, so it is therefore important that urban development does not impact them.
- 22 The Site is subject to Historic & Cultural Overlays (Wāhi Tapu SASM 005 – silent file, Ngā Tūranga Tūpūna SASM 013 – cultural landscape of high coastal settlement) under the PWDP. The identification of these sites and areas of significance to Māori will ensure cultural values are appropriately addressed through the subdivision consent process (noting the matters of discretion where resource consent is triggered by activities within the overlays) and engagement with tāngata whenua.
- 23 The Site is located within the area covered by the IMP. The IMP identifies the silent files that the Site is subject to / in proximity of. For the reasons discussed in paragraphs 21 and 22 and in technical evidence, I consider the Proposal is consistent with the IMP as it relates to matters concerning natural and physical resources of special importance to the Runanga in the region. I would expect a cultural values statement, cultural impact assessment and/or accidental discovery protocol to be a standard requirement of any subsequent consenting process.

### **Greater Christchurch Spatial Plan**

- 24 The Spatial Plan was endorsed by the Greater Christchurch Partnership Committee in February 2024 and adopted by all Partner Councils (including the Council and ECan) as their Future Development Strategy (**FDS**) to satisfy the requirements of the NPS UD. The purpose of the

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<sup>5</sup> WDDS, page 41

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Spatial Plan is to set a desired urban form for a projected population of 700,000 (to 2051) to ensure Greater Christchurch is future-proofed in the context of population growth.

- 25 The geographic extent of Greater Christchurch area covered by the Spatial Plan is shown on Map 1, which corresponds to that shown on Map A in the CRPS. One of the Spatial Plan's priorities in creating a well-functioning and sustainable urban environment is to accelerate the provision of quality, affordable housing. I highlight this to recognise the consistency with the NPS UD, which further illustrates that the CRPS is out-of-step regarding housing affordability. To this end, the Spatial Plan sets out how sufficient housing and business development capacity will be provided to meet expected demand over the next 30 years. Consistent with the spatial and statutory planning frameworks preceding the Spatial Plan, the Site is identified within a 'Future urban area' (Map 2, Spatial Plan).
- 26 For the reasons discussed in regard to the NPS UD, and as set out in the technical evidence, I consider the Proposal supports the broad intent of the Spatial Plan. Relevantly, the identification of the Site for future urban use in the Spatial Plan, being a Future Development Strategy (**FDS**) as defined by the NPS UD, means that the land is considered 'plan-enabled' in the long term (Clause 3.4(1) Meaning of plan-enabled), and WDC is required to have regard to the FDS when preparing or changing the PWDP (Clause 3.17 Effect of FDS).