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ASSESSMENT AGAINST NATIONAL POLICY STATEMENTS AND NATIONAL ENVIRONMENTAL STANDARDS

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Patricia Harte is a consultant Planner with Davie Lovell-Smith, Planners, Engineers, and Surveyors of Christchurch. Ms Harte prepared planning evidence on behalf of Mike Greer Homes NZ Limited for the Waimakariri PDP hearing and this evidence included an assessment of the proposal against National Policy Statements. Her assessment is set out below:

National Policy Statement for Urban Development 2020

1. The most relevant national policy statement is the National Policy Statement on Urban Development 2020. This NPS has a number of significant objectives, the most relevant of which is:

Objective 2: *Planning decisions improve housing affordability by supporting competitive land and development markets.*

This objective requires councils to acknowledge and address the affordability issue, which is causing significant economic and personal stress for many households, through planning decisions. From my working relationship with developers I am aware that is also of great concern to them. While they might, at times, be getting increased prices for individual sections due to running out of residentially zoned land, they would much prefer a situation where they can supply sections and houses to meet demand.

2. The Economic assessment for the Site undertaken by Fraser Colegrave of Insight Economics analyses the current and predicted future market forces operating in the housing market and in particular the housing market in Kaiapoi. These markets have been reacting in a classic way with section prices rising in direct response to limited supply of sections. The Mr Colegrave's assessment indicates that there is real potential for there to be under-supply of residential land in Kaiapoi if additional land is not zoned. He also states that the 2023 HCA has over-estimated supply due in part to the assumption that multi-unit residential development will be a significant component of new housing in Kaiapoi, despite data which shows a clear public preference for standalone homes.
3. Also of significance are NPS-UD Objectives 3 and 6, set out below.

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

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

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

d) Integrated with infrastructure planning and funding decisions; and

e) Strategic over the medium term and long term;

f) Responsive, particularly in relation to proposal that would supply significant development capacity

4. **Objective 3** makes specific reference to a high demand for housing in an area relative to other areas within the urban environment. I understand this is the case with Kaiapoi where due to factors such as land type and land being rezoned promptly after the earthquakes many sections became available at affordable prices, and importantly, prices were lower than elsewhere in the Greater Christchurch Area. This has largely remained the case since that time and resulted in a high level of demand for sections and houses in Kaiapoi.
5. The evidence of Mr Colegrave through analysis of residential land sales and building consent statistics and other sources, concludes that the demand for housing Kaiapoi in recent years has outstripped the neighbouring Christchurch City. From this I consider that Kaiapoi is a special case as referred to in Objective 3I. Accordingly it is my opinion that the decision on requested rezoning of this South Kaiapoi block should be based on "*enabling more people to live in*" Kaiapoi. I also note that Kaiapoi has a town centre and a significant area of industrial, commercial, educational and community services thereby providing employment opportunities. This satisfies point (a) in Objective 3.
6. **Objective 6** is also very relevant to consideration of this submission request and a number of other submissions as it sets down the basis for making decisions on urban development. The first requirement is that urban development decisions need to be integrated with decisions on infrastructure planning and funding. The evidence of Jamie Verstappen explains that all required services are either available or can be extended to the site. Discussions have been held with the Council regarding development contributions to enable extensions of existing reticulation and, if required, creation of additional capacity for the Councils sewerage treatment ponds.
7. Given the critical and statutory importance of the NPS-UD with regard to providing for growth of urban areas, I now address two key requirements of the NPS-UD contained in Policies 1 and 2 which Council must meet in its decisions on rezoning requests. Key aspects of these NPS Policies are paraphrased below.

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

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

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

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

- A variety of homes that meet the needs of different households in terms of type , price and location.
- Good accessibility for all people between housing, jobs, community services, natural spaces and open spaces, including by way of public or active transport
- Support the competitive development and housing markets
- Support reductions in greenhouse gas emissions, and are
- Resilient to the likely current and future effects of climate change.

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

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

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

11. **Policy 8 – Responsiveness to plan changes** This policy requires decisions of local authorities relating to urban environments to be responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments even if the development capacity is not anticipated by RMA documents. While this policy refers to plan changes, I consider it logically applies to submissions to proposed district plans as they both involving changing of district plans. In my opinion the South Kaiapoi site containing approximately 195 sections will add significantly to the development capacity of the southern end of Kaiapoi and will contribute to the well-functioning urban environment of the town as detailed above in

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paragraph 48. This opinion is supported by the economic evidence of Fraser Colegrave. Council's decision on the submitter's requests should therefore be "responsive". The RMA documents that do "not anticipate" the requested rezoning of this South Kaiapoi block are the Proposed Waimakariri District Plan zoning maps (as opposed to their objectives and policies) and Policy 6.3.1 of the Canterbury Regional Policy Statement which I address later in this evidence.

National Policy Statement for Highly Productive Land

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

National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health

13. Further intrusive investigations of these potential contaminated areas / activities will be required to determine the nature and extent of any contamination and the risk it may pose to human health and to the environment. Those investigations will be required under the NES-CS prior to any soil disturbance, change in land use or subdivision taking place.
14. In my opinion, the provisions of the NES-CS will ensure that any contamination found through these investigations can be appropriately addressed and remediated, if required.

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Fraser Colegrave is an Economist at Insight Economics. Mr Colegrave prepared Economics evidence on behalf of Mike Greer Homes NZ for the Waimakariri PDP hearing and this evidence included an assessment of the NPS-US. His assessment is set out below:

NEED FOR THE PROPOSAL UNDER THE NPS-UD About Housing Capacity Assessments (HCAs)

- 1 The NPS-UD came into effect in August 2020. It requires Councils in high growth areas to provide “at least” sufficient development capacity “at all times” to meet expected future demand for additional dwellings well into the long-term.¹
- 2 The NPS-UD also imposes strict monitoring and reporting requirements, which vary depending on the extent of growth pressures experienced. The strictest requirements are imposed on Councils in Tier 1 urban environments, where capacity shortfalls have historically been the most acute.
- 3 Waimak comprises part of the Greater Christchurch Tier 1 urban environment and must therefore complete a detailed Housing Capacity Assessment (HCA) every three years. It brings together a raft of information about dwelling supply and demand to ensure that enough capacity is provided.
- 4 Dwelling capacity is expressed in several different ways to ensure that a comprehensive picture of future supply emerges. These include:
 - (a) **Plan-enabled capacity** – which equals the maximum theoretical capacity enabled if every residential site is fully cleared and rebuilt to its maximum potential (in terms of dwelling yield).
 - (b) **Infrastructure-ready capacity** this is the element of plan-enabled capacity that is, or can/will be, serviced with necessary infrastructure like roading and three waters.
 - (c) **Likely realisable capacity** this is the proportion of infrastructure-ready capacity that can reasonably be expected to be realised based on current/historic development patterns.
 - (d) **Feasible capacity** this is the proportion of realisable capacity that is deemed commercially viable based on expected development costs and revenues. For the short-medium (10 year) term, this must incorporate current costs and revenues, while long-term feasibility can also factor in expected changes in both variables over time.
- 5 The NPS-UD allows Councils to use “any appropriate method” for estimating capacity that is feasible and likely to be realised, but the methods, inputs and assumptions must be outlined and justified. The results must also be reported for existing and urban areas, plus standalone versus attached dwellings.

¹ Policy 2, National Policy Statement on Urban Development 2020, May 2022, p.11.

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Findings of the 2021 and 2023 HCAs

- 6 In 2021, the GCP produced an HCA for its three partner Councils. It concluded that there was sufficient capacity to meet demand in most areas, except Selwyn, where significant shortfalls were projected.
- 7 In 2023, a new HCA was released. It aimed to update the 2021 HCA to reflect new plan-enabled capacity associated with new Medium Density Residential Standards (**MDRS**), plus the application of policy 3 of the NPS-UD.
- 8 Unsurprisingly, the 2023 HCA identified even greater capacity to meet demand than the 2021 version, mostly due to higher density options enabled by the MDRS and the NPS-UD.
- 9 This is illustrated in Table 1, which compares the findings of the 2021 and 2023 HCAs for both Waimakariri District and the GCP in total. The profound impacts of the MDRS and NPS-UD on plan-enabled capacity are evident, jumping from 236,000 over the long term in 2021 to almost 742,000 now. However, feasible and realisable capacity changed very little, which indicates that much of the new plan-enabled capacity unlocked by the MDRS and the NPSUD will not be delivered, at least not over the 30-year horizon of the 2023 HCA (i.e. to 2053).

Table 1: Summary of 2021 and 2023 HCAs by Council and NPS-UD Timeframe

	2021 HCA			2023 HCA		
Waimakariri District	Short-term	Med-term	Long-term	Short-term	Med-term	Long-term
Plan-enabled	2,273	2,273	12,192	79,345	79,345	79,345
Infrastructure-ready	n/a	n/a	n/a	14,914	14,914	14,914
Realisable	2,273	2,273	12,192	15,234	15,234	15,234
Feasible	2,273	2,273	12,192	5,950	5,950	14,450
GCP Totals	Short-term	Med-term	Long-term	Short-term	Med-term	Long-term
Plan-enabled	218,685	220,559	236,234	731,369	731,369	741,899
Infrastructure-ready	n/a	n/a	n/a	130,981	130,981	131,936
Realisable	98,879	100,854	116,529	131,301	131,301	132,256
Feasible	108,845	110,719	126,394	111,500	111,500	132,550

Problems with the 2023 HCA

Failure to Properly Test Sufficiency

- 10 In my view, the 2023 HCA is only a *partial* update to the 2021 HCA, not a full refresh, with large parts of the 2021 version carried forward to the 2023 one verbatim. Consequently, I do not consider the 2023 HCA to provide an accurate picture of the **current** supply/demand situation, nor does it meet NPS-UD reporting requirements.
- 11 Critically, the 2023 HCA does not test sufficiency for different dwelling types in new and existing locations as required. Instead, it simply tests sufficiency in aggregate for each Council across all dwelling types and all areas. This, in my view, almost invariably masks a material shortfall for stand-alone dwellings in new urban areas, which are consistently in high demand.

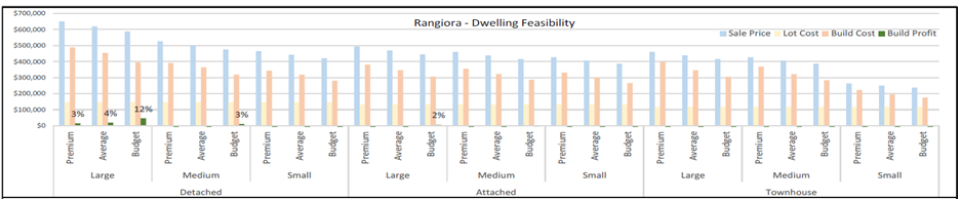
Plan-enabled Capacity does not Meet Local Housing Demand

- 12 As already noted, the 2023 HCA’s plan-enabled capacity figures almost exclusively represent attached/medium density housing enabled by the MDRS. While that is fine, at least in theory, these new housing typologies do not match local needs and preferences.
- 13 While I agree that medium density typologies like duplexes and terrace houses are increasingly important pieces of the future housing puzzle, at least nationally, there is little demand for them currently in the district. This is demonstrated by building consent data, where standalone homes accounted for more than 92% of new district homes consented over the last 10 years.
- 14 Thus, while the MDRS may have provided unparalleled boosts in *plan-enabled* capacity, much of it fails to meet local housing needs and preferences, so is unlikely to be realised and therefore contribute to future market supply any time soon.

Cost Information is Way Out of Date

- 15 In addition, the 2023 HCA uses out-of-date cost data from early 2021 to estimate feasibility despite acknowledging that “the costs of some construction materials has increased significantly and therefore the feasibility of some developments may have changed.”²
- 16 Indeed, a lot has happened since early 2021, with financial viability severely challenged by a ‘perfect storm’ of (i) higher construction costs, which are up 32% since 2021, (ii) elevated interest rates, and (iii) a recent stagnation of house prices. Together, these recent market changes have fundamentally reshaped development feasibility, but they are not captured in the 2023 HCA, which I consider to seriously limit its validity.
- 17 Not only that, but a separate feasibility report supporting the 2021 HCA for Waimak revealed that no dwellings were financially feasible to develop in Rangiora over the 10-year period to 2031 under the NPS-UD’s recommended developer margin of 20%. This is shown in the summary of estimated costs, revenues, and margins for different dwelling types, sizes and build qualities below.

Figure 3.2: Summary Results of Dwelling Feasibility Model – Short and Medium Term (Current scenario)



- 18 While not easy to read at this resolution, this screenshot shows that virtually every combination of dwelling type, size, and build quality in Rangiora was not financially feasible over the short-medium (10-year) term.

² Greater Christchurch Partnership. (2023). *Greater Christchurch Housing Development Capacity Assessment*. Appendix 2, p.69, point 5.

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- 19 Only large, budget detached dwellings were estimated to achieve a developer margin of more than 10%, but this is still well below the recommended value of 20%. Oddly, contrary to the facts, the report concluded that “most dwelling types that were tested in the dwelling feasibility model are currently feasible.”
- 20 Fast-forward to 2024, where construction costs have spiked upwards, as has the cost of financing, and it becomes clear that very little – if any – of the 2023 HCA’s plan-enabled capacity is likely to be financially viable in the foreseeable future.

Comments on Formative’s December 2023 Report

- 21 In late 2023, Formative released an updated dwelling supply and demand assessment for Waimak. Its results closely resemble the district’s figures in the 2023 HCA, but with slighter higher capacity.
- 22 While this report includes more detailed sufficiency testing than the 2023 HCA, it oddly continues to rely on cost data from 2021 (see footnotes 24/25 of the Formative report). That information is now firmly obsolete, and so too is any analysis that relies on it to test development feasibility.
- 23 Another shortcoming of the latest Formative report is its failure to disclose any relevant information about the assumed selling prices, and hence affordability, of new homes purported to represent feasible capacity.
- 24 In my experience, this lack of price and affordability reporting is likely to reflect a significant mismatch between the assumed selling prices of ‘feasible’ dwellings and households’ ability to afford them, particularly in today’s high interest rate environment.
- 25 The new report also continues to adopt an inordinately low margin for building developers of only 7% compared to a recommended value of at least 20%. This, in turn, reflects an ongoing conflation of Net Profit After Tax (**NPAT**) and developer margin in Formative’s analysis, which I have pointed out several times before, including recently in Selwyn.
- 26 In addition, the new Formative report seeks to justify its inordinately low profit margin assumptions by arguing that builder profits are systematically boosted by unspent contingencies.³ However, I am not aware of any credible research or analysis to support that, with my professional experience suggesting that contingencies are usually exhausted, with cost overruns still occurring.
- 27 The international literature also does not support Formative’s view. In fact, a recent review of cost overruns across hundreds of construction projects globally⁴ found that most went well over budget. It identified 175 different causes, grouped into 10 key internal and external factors. However, it provides no evidence to support the unusual view that cost contingencies are seldom fully spent, as Formative oddly claim.
- 28 Overall, for the reasons just noted, I place little (if any) weight on this assessment for determining whether additional supply is required to provide “at least” enough capacity “at all times” to meet demand.

HCA Summary and Conclusion

³ See footnote 29 on page 26 of the Formative Report

⁴ <https://www.ijimt.org/vol8/717-MP0022.pdf>

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- 29 Recent reporting for the district, including the 2023 HCA, suggest that sufficient capacity is already being provided. However, as noted above, these conclusions are based on out-of-date cost data and unsubstantiated assumptions that limit their reliability. Consequently, I do not believe the district has enough capacity to meet demand, with a lot more needed.
- 30 Interestingly, the Independent Hearings Panel for Plan Change 31 (PC31), which seeks to rezone 156 hectares of farmland in Ohoka, reached a similar conclusion. It found that WDC has “likely overestimated development capacity in the District and there is a real risk that a shortfall exists in the medium term.”⁵
- 31 The proposal helps to plug this looming gap in feasible capacity by providing quality, master-planned housing that is in step with market demand and able to be realised at both pace and scale.

⁵ Independent Hearings Panel. Private Plan Change RCP031 Decision Report. Paragraph 92.

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ASSESSMENT AGAINST REGIONAL AND LOCAL PLANNING DOCUMENTS

Patricia Harte is a consultant Planner with Davie Lovell-Smith, Planners, Engineers and Surveyors of Christchurch. Ms Harte prepared planning evidence on behalf of Mike Greer Homes NZ Limited for the Waimakariri PDP hearing. Excerpts from Ms Harte's evidence relevant to an assessment against Regional and Local Planning documents are set out below:

Canterbury Regional Policy Statement

1. The Mike Greer Homes Submission contains an assessment of the relevant objectives and policies in the CRPS. In summary the proposed rezoning is fully in accord with the requirements contained in Chapter 5 – Land use and Infrastructure, Objectives 5.2.1 Location, design and function of development and 5.3.7 Strategic land network and arterial roads. The criteria in these provisions are very similar to those in the pWDP which I address later in this evidence.
2. Chapter 6 of the CRPS was added to the CRPS in 2013 and is focused on responding to the anticipated demand for business and residential activities which need to be replaced or relocated as a result of the earthquakes. This recovery has largely occurred in relation to the provision and uptake of identified (and now zoned) land for business and residential activities impacted by the earthquakes. This provision for anticipated demand was in the form of identifying Greenfield Priority Areas (**GPA**) and, more recently, Future Development Areas (**FDA**) on Map A in the CRPS and specifying in Policy 6.3.1 (Development within the Greater Christchurch area) that these are the **only areas** where new greenfield development can occur.
3. There have been two major changes in the planning environment since the Map A approach was included in the CRPS. Firstly, there has been, and continues to be, a strong and ongoing demand for housing, particularly in Kaiapoi where lower cost housing has been available. We are now in a period of growth that is not earthquake related so the relevance of some of the Chapter 6 policies, in my opinion, is diminished. Secondly, the National Policy Statement on Urban Development came into effect to overcome many of the issues associated with lack of supply of land for residential and business use and the out of date policy environment contained in various RMA documents. To do this the NPS-UD, and in particular Policy 8, directs local authorities to be “responsive” in their “decisions affecting urban environments” that would “add significantly to development capacity and contribute to well-functioning environments” regardless of whether this capacity is anticipated by existing RMA planning documents. In my opinion the decision to be made on the requested zoning of Mike Greer Homes falls exactly into this category and should therefore be responsive and positive.
4. In my opinion there are a number of policies within the CRPS which indicate that urban development is not limited to Map A areas. Firstly, CRPS **Objective 6.2.2** Urban Form and Settlement states:

The urban form and settlement pattern in Greater Christchurch is managed to provide sufficient land for rebuilding and recovery need and set a foundation for future growth,

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with and urban form that achieves consolidation and intensification of urban areas, avoids unplanned expansion of urban areas by:

1. aiming to achieve the following targets for intensification as proportion of overall growth through the period of recovery:

a. 35% averaged over the period between 2013 to 2016

b. 45% averaged over the period between 2016 to 2021

c. 55% averaged over the period between 2022 and 2028

2. providing higher density living environments ...

3. reinforcing the role of the Christchurch central business district

4. providing for the development of greenfield priority areas, and of land within Future Development Areas where the circumstances in Policy 6.3.12 are met, on the periphery of the Christchurch's urban area, and surrounding towns at a rate and in locations that meet anticipated demand and enables the efficient provision and use of network infrastructure

5. encouraging self-sufficient growth of the towns of Rangiora, Kaiapoi, Woodend, Lincoln, Rolleston and Prebbleton and consolidation of the existing settlement of West Melton;

5. This policy sets out how urban form and settlement is to be managed and includes providing for GPA and FDA in 6.2.2.(4), but does not specify this as limiting development, rather it is one of several methods to be utilised. Significantly, in relation to the Proposal for additional MRZ at South Kaiapoi, Objective 6.2.2.(5) of the CRPS lists "*encouraging sustainable and self-sufficient growth of the towns of Rangiora, Kaiapoi Woodend, Lincoln, Rolleston and Prebbleton.*" This statement refers to several towns which do not have GPAs or FDAs and therefore strongly indicates that the reference to GPAs and FDAs in 6.2.2.(4) sits within, but does not override, the methods of providing for development with Greater Christchurch. In my opinion this positive approach is in line with, and supports, the NPS-UD which is a higher order policy document.

6. With regard to Policy 6.3.1, I note that the Principal reasons and explanation for this policy state:

Map A shows existing urban areas and priority areas for development for Greater Christchurch. These areas are identified as being required to provide sufficient land zoned for urban purposes to enable recovery and rebuilding through to 2028. The Policy and Map A provide a clear, co-ordinated land use and infrastructure framework for the recovery of Greater Christchurch.

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

Proposed Waimakariri District Plan

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7. The following assessment considers the proposed rezoning of the submitter's site from Rural Lifestyle to Medium Density Residential in relation to the PWDP objectives and policies.
8. **Strategic Directions, Objective 2** in the Proposed Plan sets out the desired outcomes for urban development including Urban development and infrastructure that:
 - a. Is consolidated and integrated with the urban environment,
 - b. recognises the existing character, amenity values and is attractive and functional to residents, business and visitors,
 - c. Utilises the Councils wastewater, potable water supply and stormwater infrastructure where available;
 - d. Provides a range of housing opportunities, focusing on new residential activity within existing towns;
 - e. Support a hierarchy of urban centres, with the Districts main centres in Rangiora, Kaiapoi, Oxford and Woodend being The focus around which residential development and intensification can occur;
 - f. Provides people with access to a network of spaces with urban environments for open space and recreation.
9. My assessment of the requested MDR rezoning against these criteria is set out below and draws on the Urban Design assessment of Vickramjit Singh. All of these criteria are met.
 - a. The South Kaiapoi site immediately adjoins the Kaiapoi township and its residential zoning.
 - b. The proposed rezoning and revised outline development plan recognise the character of the area incorporating the lower area near the railway line as a reserve and as a stormwater area available to the public as a reserve.
 - c. The development will generally connect to Council's existing reticulated services, however where this is not possible development contributions have been agreed with Council for upgrading and/or extension of the existing services as discussed in the evidence of Jamie Verstappen.
 - d. The submission requests Medium Density Residential zoning which will enable a variety of section sizes consequently a range of housing options.
 - e. The proposed Medium Density zoning will provide for full residential use of this site which provides the final piece of the land of a size and shape in south-east Kaiapoi.
 - f. The new ODP prepared for the site provides for very good connectivity within the site as well as access to the local purpose and esplanade reserves around the perimeter of the site including a setback strip along Main North Road.
10. **Urban Form and development, Policy 2 (UFD-P2)** addresses the identification and location of new Residential Development Areas. It is therefore not directly relevant as the submitter is no longer pursuing their request for a South Kaiapoi Development Area. However, I consider it is useful to assess the proposed residential zoning against the criteria in this policy. These criteria are in clause 2 of UFD-P2 which I set out below with associated comments:

UFD-P2 Identification/location of new Residential Development Areas

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

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

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

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

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

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

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

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

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

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

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

g. Are informed through the development of an ODP;

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

h. Supports reductions in greenhouse gas emissions; and

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

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- i. *Are resilient to natural hazards and the likely current and future effects of climate change as identified in SD-O6*

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

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

Overall policy assessment

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