

APPENDIX 4

ASSESSMENT AGAINST NATIONAL POLICY STATEMENTS AND NATIONAL ENVIRONMENTAL STANDARDS

Appendix 5 begins on page 9

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

National Policy Statement on Urban Development

- 1 The NPS UD represents the Government's latest thinking on how to encourage well-functioning and liveable urban environments. It aims to remove barriers to the supply of land and infrastructure and make room for growth. It applies to all planning decisions that affect an "urban environment", and requires the Council, as a "Tier 1 local authority", to "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." This is directly applicable to Kaiapoi and the Site, which is within the Christchurch tier 1 urban environment (as defined in the NPS UD and with reference to the commonly used term "Greater Christchurch"). I therefore consider the NPS US applies to the Proposal.
- 2 My assessment of the Proposal against the NPS UD is contained in **Attachment 2** and summarised below.
- 3 Giving effect to the NPS-UD involves:
 - (a) having 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 (Objective 1);
 - (b) making planning decisions that improve housing affordability (Objective 2);
 - (c) enabling more people to live in areas of an urban environment where there is high demand for housing (Objective 3);
 - (d) recognizing that urban environments and their amenity values develop and change over time (Objective 4);

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- (e) requiring decisions on urban development that affect urban environments to be integrated with infrastructure planning and funding decisions; strategic over the medium term and long term; and responsive to proposals that would supply significant development capacity (Objective 6);
 - (f) using robust and frequently updated information about urban environments to inform planning decisions (Objective 7);
 - (g) urban environments support greenhouse gas emission reductions and are resilient to the effects of climate change (Objective 8);
 - (h) making planning decisions that contribute to well-functioning urban environments that have or enable a variety of homes that meet the needs of different households (in terms of type, price and location); have good accessibility; and support the competitive operation of land and development markets (Policy 1(b), (c) and (d));
 - (i) Council providing at least sufficient development capacity to meet expected demand for housing over the short, medium and long terms (Policy 2);
 - (j) when making planning decisions that affect the urban environment, regard is had to the planned urban built form anticipated by RMA documents that have given effect to the NPS UD, and the need to balance changes to amenity values against the benefits of increased housing supply and choice (Policy 6); and
 - (k) a responsive approach to plan changes providing significant development capacity and contributing to well-functioning urban environments (Policy 8).
- 4 The NPS-UD directs the Council to provide for more housing to be built in places close to jobs, community services and public transport; and to respond to market demand. Assessing the Proposal in isolation of this higher order document would not present an appropriately balanced or considered view of the environment in which the Site is situated, particularly acknowledging the identified shortfall in available greenfield land in Kaiapoi with a consequential impact on affordability and efficient land use.
- 5 Based on the nature and form of MRZ-enabled development on the Site, and considering the technical evidence, I consider the Proposal would contribute to a well-functioning urban environment, i.e., integrated with the established residential environment of Kaiapoi; located near commercial centres and employment opportunities and in an area of high demand for housing;

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adding significantly to development capacity; meeting the needs of the different households; good accessibility to public or active transport modes; supporting reductions in GHG emissions; and resilient to the effects of climate change. The Proposal takes advantage of the Site's shape and location to contribute to a compact, consolidated settlement pattern in a location that will readily integrate with its surroundings.

- 6 In terms of GHG emissions, I record that I have sighted draft technical evidence of John Smyth for Momentum on this subject, which assesses and compares the baseline lifecycle GHG emissions of a similar, average development elsewhere in the District (Reference Proposal) against the projected lifecycle GHG emissions of the Proposal. Based on the findings of Mr Smyth's draft evidence, the Proposal supports reductions in GHG emissions through initiatives that reduce the direct upfront carbon impact of the infrastructure works; initiatives that facilitate lower carbon forms of transport and lower overall vehicle kilometres travelled; and the restoration of a 6ha ecological area with associated carbon sink impacts.
- 7 For these reasons, and having considered the technical evidence, it is my view that Proposal is consistent with a well-functioning urban environment, will meet the general directive of the NPS-UD, and will provide much-needed development capacity. In short, I consider it will give effect to the NPS-UD more than would RLZ.

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-UD. His assessment is set out below:

NEED FOR THE PROPOSAL UNDER THE NPS-UD

About Housing Capacity Assessments (HCAs)

- 8 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

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

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- 9 The NPS-UD also imposes strict monitoring and reporting requirements to ensure that any potential capacity shortfalls are addressed quickly. These monitoring and reporting requirements capacity vary depending on the extent of growth pressures being experienced, with the strictest requirements imposed on Councils in Tier 1 urban environments. These represent the highest-growth areas, where capacity shortfalls have historically been the most acute.
- 10 Waimak comprises part of the Greater Christchurch Tier 1 urban environment and must therefore complete a detailed Housing Capacity Assessment (HCA) every three years. These bring together a raft of information about dwelling supply and demand to ensure that enough capacity is provided.
- 11 Various capacity definitions are considered in a typical HCA to ensure that a comprehensive picture of future supply emerges. These include:
- (a) **Plan-enabled capacity** – this 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.
- 12 Clause 3.26 of the NPS-UD gives councils flexibility 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.
- 13 In addition, feasible and likely realisable capacity must be quantified as numbers of dwellings (i) in existing and new urban areas, and (ii) of different types, including standalone dwellings and attached dwellings.
- 14 Finally, clause 3.27 requires sufficiency to also be assessed for stand-alone and attached dwellings in new and existing urban areas.

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Findings of the 2021 and 2023 HCAs

- 15 In 2021, the GCP produced an HCA for its three partner Councils, which concluded that there was sufficient capacity to meet demand in most areas over most timeframes, except Selwyn, where significant shortfalls were projected over the medium to longer term.
- 16 Earlier this year, an updated (2023) HCA was released. It sought to refresh and update the 2021 HCA, largely to reflect new plan enabled capacity associated with the application of new Medium Density Residential Standards (**MDRS**), plus policy 3 of the NPS-UD.
- 17 Unsurprisingly, then, the 2023 HCA identifies even greater capacity to meet demand than the 2021 version did due to new higher density development options ushered in by the MDRS and the NPS-UD.
- 18 Table 1 summarises the housing capacity estimates of the 2021 and 2023 HCAs for the three GCP Territorial Authorities separately, plus the total.

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

	2021 HCA			2023 HCA		
	Short-term	Med-term	Long-term	Short-term	Med-term	Long-term
Christchurch City						
Plan-enabled	205,178	205,178	205,178	544,000	544,000	544,000
Infrastructure-ready	n/a	n/a	n/a	94,000	94,000	94,000
Realisable	82,452	82,452	82,452	94,000	94,000	94,000
Feasible	101,994	101,994	101,994	94,000	94,000	94,000
Selwyn District						
Plan-enabled	11,234	13,108	18,864	108,024	108,024	118,554
Infrastructure-ready	n/a	n/a	n/a	22,067	22,067	23,022
Realisable	14,154	16,129	21,885	22,067	22,067	23,022
Feasible	4,578	6,452	12,208	11,550	11,550	24,100
Waimakariri District						
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
3 TAs Combined						
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

- 19 The profound impacts of the MDRS and NPS-UD on *plan enabled* capacity are evident, boosting it from about 236,000 over the long-term in the 2021 HCA to almost 742,000 now. However, feasible and realisable capacity changed little, which seems to suggest 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).

Problems with the 2023 HCA

Failure to Properly Test Sufficiency

- 20 In my view, the 2023 HCA is best described as only a partial update to the 2021 HCA to capture the effects of the MDRS and NPSUD on plan enabled capacity. However, it is not a full refresh, with much material from the 2021 version carried forward verbatim. As a result, in my view, the 2023 does not provide an accurate picture of the current supply/demand situation, and it fails to meet some of the NPS-UDs most critical reporting requirements.
- 21 My biggest concern is that the 2023 HCA does not test the sufficiency of capacity for different dwelling types in new and existing locations, as explicitly required by the NPS-UD. Instead, it

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simply tests sufficiency in aggregate for each Council across all dwelling types and all areas. Consequently, it fails to ensure that sufficient capacity is provided for stand-alone dwellings in new urban areas, which are consistently in high demand.

Cost Information is Out of Date

- 22 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
- 23 A lot has happened since early 2021, with financial viability squeezed by a ‘perfect storm’ of (i) higher construction costs, (ii) elevated interest rates, and (iii) a recent correction in house prices. These recent market changes have severely impacted development feasibility, but are not captured in the 2023 HCA, which seriously affects its reliability.

Plan Enabled Capacity does not meet Local Housing Demand

- 24 As noted above, the 2023 HCA’s new plan enabled capacity figures almost exclusively represent attached/medium density housing enabled by the MDRS. Indeed, as shown in Table 1 above, Waimak’s short- to medium-term plan-enabled capacity was less than 2,300 dwellings in the 2021 HCA, but this has now skyrocketed to nearly 80,000 in the 2023 update.³ While that is fine, at least in theory, these new housing typologies do not match clearly-stated local needs and preferences.
- 25 While I agree that medium density housing typologies, such as duplexes and terrace houses, will be increasingly important pieces of the future housing puzzle, at least nationally, there is little demand for them 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.
- 26 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.

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

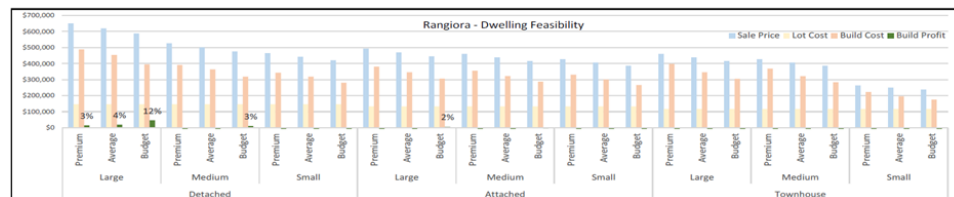
³ This is confirmed on page 48 of the HCA, which notes that the “dwelling typologies associated with plan enabled capacity are what the district plans enable.”

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No Feasible Development in Rangiora (according to 2021 HCA)

27 Finally, and notwithstanding the many shortcomings just identified, a feasibility assessment by Formative underpinning the 2021 HCA showed that no dwellings were financially feasible to develop in Rangiora over the next 10 years, at least not when the recommended 20% developer margin is assumed. This is shown in the excerpt below, which shows the estimated costs, revenues, and margins of different dwelling types, sizes and build qualities.

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



28 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 infeasible over the short-medium (10-year) term.

29 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%. Contrary to the facts, the report concludes that “most dwelling types that were tested in the dwelling feasibility model are currently feasible.”

30 Fast-forward to 2023, where construction costs are through the roof, as is 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 viable in the foreseeable future.

HCA Summary and Conclusion

31 While I generally agree with the approach used to assess district plan enabled capacity in the 2023 HCA, the subsequent calculations of feasibility appear unreliable and of limited inferential value.

32 Not only that, but the 2023 HCA fails to test sufficiency across different dwelling types, and between new and existing urban areas, as the NPS-UD requires. Had it done so, I am highly confident it would have identified looming shortfalls in greenfield capacity for standalone homes in the district.

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- 33 Consequently, I disagree that the district has sufficient capacity to meet demand, as the 2023 HCA implies.
- 34 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.”⁴
- 35 The proposal helps plug this looming gap in feasible capacity by providing quality, master-planned housing that is in step with market demand.

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ASSESSMENT OF REGIONAL AND LOCAL 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

- 36 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.

⁴ Independent Hearings Panel. Private Plan Change RCP031 Decision Report. Paragraph 92.

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- 37 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.
- 38 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.
- 39 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.
- 40 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)⁵) and “greenfield area” (as used in Policy 6.3.7(6)⁶) are not defined in the CRPS, whereas “Greenfield Priority Areas” and “greenfield development” are, with reference to the areas identified on Map A.
- 41 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

⁵ “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

⁶ “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.

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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).

- 42 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.
- 43 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)¹⁹ 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-UD⁷ 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.
- 44 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.
- 45 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

⁷ 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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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.

46 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.

47 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.

48 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.

49 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.

50 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:

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- (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.).

51 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

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52 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);

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- (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).

53 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

54 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 Kaiapoi⁸ 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 meet increased*

⁸ WDDS, page 5

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performance requirements” and “existing strategic infrastructure is considered, including Christchurch International Airport’s proposed review of the airport noise contours”⁹.

- 55 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

- 56 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.
- 57 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.
- 58 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

- 59 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

⁹ WDDS, page 41

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Development Strategy (**FDS**) to satisfy the requirements of the NPS UD. The purpose of the 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.

60 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).

61 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).