

ASSESSMENT IN RELATION TO NATIONAL POLICY STATEMENTS AND NATIONAL ENVIRONMENTAL STANDARDS

Patricia Harte is a consultant Planner with Davie Lovell-Smith, Planners, Engineers, and Surveyors of Christchurch. Ms Harte prepared planning evidence on behalf of Doncaster Developments 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 to the project is the National Policy Statement on Urban Development 2020. The NPS-UD 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.

The Economic assessment undertaken by Tim Heath of Property Economics analyses the current and predicted future market forces operating in the housing market and in particular the housing market in Waimakariri District and Rangiora. These markets have been reacting in a classic way with section prices rising in direct response to limited supply of sections. He concludes that:

"...it can be anticipated that the wider Waimakariri District will face a significant shortfall of approximately 1,240 dwellings over the medium term (2032). Consequently, there is a real requirement to provide additional residential capacity in the main urban areas of the district over the forecast period.

Based on my assessment of its locational characteristics, the submission site is an appropriate and economically efficient location to address a portion of this anticipated demand over the medium term, given its proximity to a large amount of existing infrastructure, services and amenities.

- 2 **Objective 2** of the NPS-UD states very clearly that planning decisions made on plan changes and the like need to fully acknowledge and address the affordability issue which is causing significant economic and personal stress for many households. 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 limited residentially zoned land, they would much prefer a situation where they can supply sections and houses to meet demand. I have addressed housing demand and capacity earlier in this evidence.

3 Also of significance are NPS-UD Objectives 3 and 6, namely:

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

- a) The area is in or near a centre zone or other area with many employment opportunities.
- b) The area is well-serviced 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.

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 proposals that would supply significant development capacity.

4 **Objective 3** makes specific reference to enabling people to live in an area “in or near” a centre zone. The Doncaster site actually adjoins the Arlington Local Centre zone which contains a range of commercial and community services. The transportation assessment also indicates efficient connections through to the Rangiora town centre and through to Christchurch by the nearby Park and Ride facility. In my opinion the site is therefore well located in regard to connections to services. With regard to closer employment opportunities, some of these may be available locally or within Rangiora which has a substantial and growing industrial sector.

Objective 6 is also very relevant to consideration of this submission as it sets down 3 requirements as 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 infrastructure evidence of Regan Smith indicates that there are no impediments to the Doncaster site connecting to local reticulated services. The evidence of Tim Heath confirms the

need to be “strategic” by rezoning now to meet the anticipated medium term demand for housing in Rangiora, addressing the second requirement. The third matter in this Objective requires local authorities decisions on urban development to be “responsive”. Clearly that instruction must apply to decisions on rezoning requests contained in submissions to proposed district plans. In my opinion, this Objective by referring to being “responsive” also empowers district councils to make decisions that are not fully consistent with dated higher level policy documents.

5 I now assess whether the requested rezoning satisfies relevant NPS-UD policies.

- **Policy 1- Planning decisions to contribute to a well-functioning urban environments**

- The location of the Doncaster site will enable easy access to jobs, community services and open space and routes for public and active transport.
- There is some potential for reduced greenhouse emission through a compact urban form. The site is relatively close to some community facilities. There are also a range of green spaces and reserves in the vicinity. In particular the Arlington Park is very close to the site and to the River Road reserve, Ashgrove Park and Regent Reserve also serve residents of the area.

- **Policy 2 – Sufficient development capacity**

- The economic analysis concludes that there will be a shortage of residential capacity in the medium term and that if this is not planned for that market forces will result in both new and existing housing becoming more expensive, creating significant issues for many households. Although the Doncaster site is not large, it is well located and, in my opinion, it has the required and valued features of land suited for housing development.

- **Contribution to Creating a ‘Well-functioning Urban Environment’**

6 Under the NPS-UD Policy 1, ‘*well-functioning urban environment*’ is defined as urban environments that, as a minimum:

(a) *Have or enable a variety of homes that:*

i. Meet the needs, in terms of type, price, and location, of different households; and

ii. Enable Māori to express their cultural traditions and norms; and

(b) *Have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and*

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- (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*
- (d) Support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and*
- (e) Support reductions in greenhouse gas emissions; and*
- (f) Are resilient to the likely current and future effects of climate change.*

- 7 The proposed development's preliminary capacity plan demonstrates its capacity to offer a mix of styles and densities, catering to different price ranges, typologies, and living options. This development is situated in a locale characterised by distinct locational characteristics, views, and high amenity proposed, setting it apart from the current urban environment. This aligns with Policy 1(a) of the NPS-UD.
- 8 Despite the residential focus of the proposed development, the site's close proximity to existing infrastructure, services, and amenities closely aligns with the NPS-UD. This alignment, particularly addressing Policy 1(c), ensures excellent accessibility for all individuals between housing, jobs, community services, natural spaces, and open spaces, including through public or active transport.
- 9 The earlier analysis in this evidence has revealed a demand for additional housing supply within the wider district's urban areas over the medium term. Consequently, any potential competitive impacts on the development market are expected to be temporal and mitigated by the projected market growth and increased demand. In other words, the proposed development has no real propensity to generate adverse impacts on the competitive operation of land and development markets, particularly with the staged approach to the development. To the contrary, the rezoning of the site would support stimulating market competitiveness and benefit market and consumer choice. This satisfies NPS-UD Policy 1(d).
- 10 Policies 1(e) and 1(f) do not primarily focus on economic aspects, while Policy 1(b) is not pertinent to residential development. Therefore, these requirements are not considered as part of this economic analysis.
- 11 Considering the aforementioned factors, from my perspective, the proposed development would make a positive economic contribution to the establishment of a 'well-functioning urban environment' in both Rangiora and the broader Waimakariri District.

National Policy Statement for Highly Productive Land

- 12 The National Policy Statement on Highly Productive Land has the objective of:

"Highly productive land being protected for use in land-based primary production, both now and for future generations."

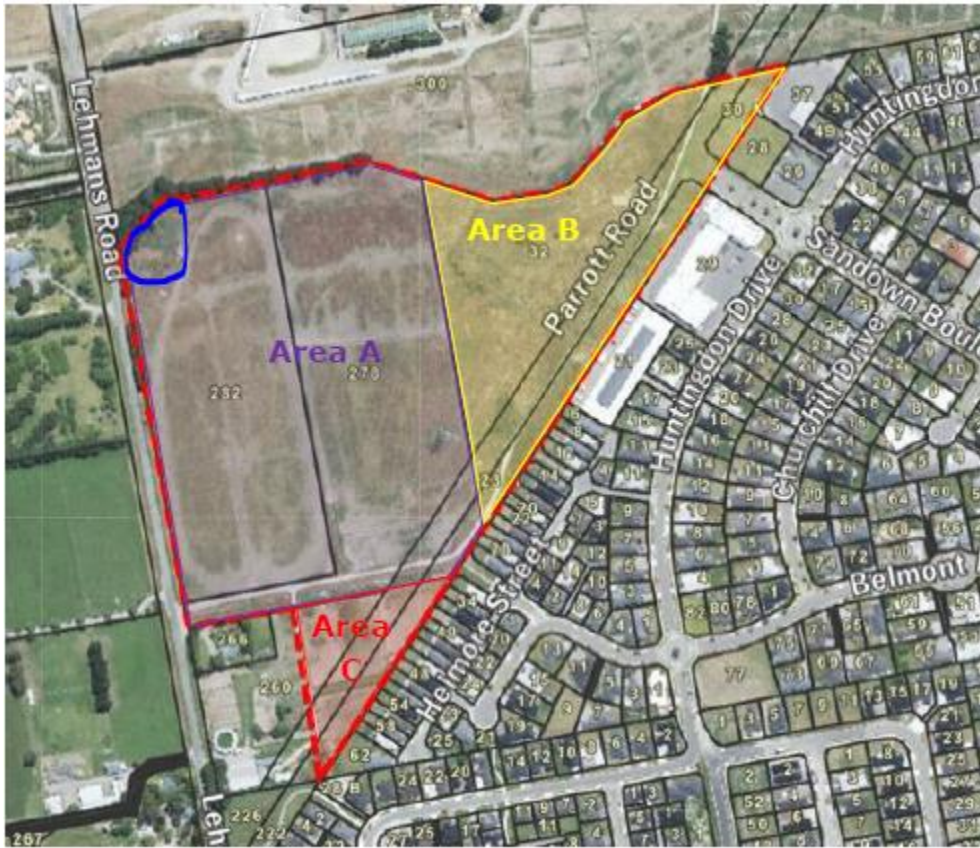
As the Doncaster site already has an urban zoning it is not subject to the NPS-HPL.

Giles Learman is a Geotechnical and Environmental Engineer / Director employed by Engineering Design Consultants Limited. Mr Learman prepared planning evidence on behalf of Doncaster Developments for the Waimakariri PDP hearing and this evidence included an assessment of the proposal against National Environmental Standards. His assessment is set out below:

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

- 13 The NES came into effect on 1 January 2012. Each Territorial Authority implements the NES in accordance with their Section 31 functions under the Resource Management Act 1991 (RMA).
- 14 The NES applies to assessing and managing the actual or potential adverse effects of contaminants in soil on human health from five activities: subdivision, land-use change, soil disturbance, soil sampling, and removing fuel storage systems. The NES only applies to land affected by or potentially affected by soil contaminants. This is if an activity or industry on the Hazardous Activities or Industries List (HAIL) has been, is, or is more likely than not to have been undertaken on that land. If the NES applies, then consent may be required if any of the activities listed above are proposed to take place on the site.
- 15 An assessment of the site was carried out by Engineering Design Consultants (**EDC**) was commissioned by Doncaster, on the 17 November 2021 to provide a Preliminary Site Investigation (**PSI**) for a proposed residential subdivision of West Arlington. Based on the site visit, and a review of the available information, EDC considers that it is more likely than not, that no Hazardous Activities and Industries (**HAIL**) activity has occurred on site and therefore the National Environmental Standard does not apply and it is highly unlikely that there will be a risk to human health from compounds within the site soil if the proposed subdivision is done. The exception to

this is the burn area and stockpiles in the northwest portion of the site, as highlighted in blue on Figure 1 **below**.



16 A close up of the highlighted area in Area A is **below**.



- 17 In view of the above a Detailed Site Investigation (DSI) is not generally considered warranted across the site. However, further investigation is recommended in the area highlighted on Figure 3 and should aim to assess the content of the stockpiles and undertake testing as considered necessary. A surface scrape of the burn area should be undertaken under the supervision of a SQEP and a validation statement provided, based on visual assessment, to confirm removal of potentially ashy soils. The ashy soils should be disposed of to an appropriate waste facility. A Suitably Qualified Environmental Practitioner should be immediately contacted if potential soil contamination is uncovered in any future development works.