

Response ID ANON-URZ4-5FJZ-M

Submitted to Fast-track approval applications
Submitted on 2024-05-03 10:50:52

Submitter details

Is this application for section 2a or 2b?

2A

1 Submitter name

Individual or organisation name:
Ben Dormer

2 Contact person

Contact person name:
Ben Dormer

3 What is your job title

Job title:
Developer

4 What is your contact email address?

Email:

s 9(2)(a)

5 What is your phone number?

Phone number:

s 9(2)(a)

6 What is your postal address?

Postal address:

c/- Aston Consultants, PO Box 1435, Christchurch 8140

7 Is your address for service different from your postal address?

Yes

Organisation:
Aston Consultants Ltd, Resource Management and Planning

Contact person:
Fiona Aston

Phone number:

s 9(2)(a)

Email address:

s 9(2)(a)

Job title:
Principal

Please enter your service address:

PO Box 1435, Christchurch 8140

Section 1: Project location

Site address or location

Add the address or describe the location:

The application is focused on:

- 63 Oxford Road (10.12 hectares) (RS 903 BLK VI Rangiora Survey District)
 - 212 Johns Road (8.89 hectares) (Lot 1, DP 61800 Blk VI Rangiora Survey District)
 - 126 Lehmans Road (5.57 hectares) (Pt RS 937 1275 Blk VI Rangiora Survey District)
- (a total area of approximately 24.58 hectares)

The above properties fall within a total area of approximately 40 hectares as shown on the attached plan. The applicant is in discussions with other property owners within the total area identified.

The project should therefore be regarded as including the area of land between Oxford Road, Lehmans Road, Johns Road and Acacia Avenue (the latter being the boundary of the existing residential area) as shown on the attached figure.

Recognising the extent of approval/support from existing landowners, the project has been staged, with stage 1 including only that land (i.e. the 24.58 hectares) in relation to which the applicant has formal agreements in relation to possible development of the land for residential subdivision(s).

Any further land would be considered as a part of future development stages.

File upload:

West Rangiora residential development site location.pdf was uploaded

Upload file here:

No file uploaded

Do you have a current copy of the relevant Record(s) of Title?

Yes

upload file:

Records of title - west Rangiora Residential development.pdf was uploaded

Who are the registered legal land owner(s)?

Please write your answer here:

In relation to which arrangements have been entered into:

- Dalkeith Holdings Limited - 63 Oxford Road and 212 Johns Road
- Miranda Hales, Dorothy Stewart and John Woodward – 126 Lehmans Road

The other land (in in relation to which discussions are occurring) is:

- Waimakariri District Council (4.11 hectares Pt RS 956, and 5.76 hectares Pt RS 9371275)
- Charles Nicholas Taylor and Priscilla Kay Taylor (2.43 hectares Pt RS 909)
- Alphons Cornelius Sanders and Elisabeth Petronella Gerardus Sanders-Beckers (2.43 Pt RS 909)

Detail the nature of the applicant's legal interest (if any) in the land on which the project will occur

Please write your answer here:

The applicant holds formal agreements with the property owners of 63 Oxford Road, 212 Johns Road 126 Lehmans Road enabling the applicant to purchase and undertake the development proposed, subject to relevant approvals being obtained.

The applicant is in negotiations with other property owners (with these negotiations being progressed to various extents). The wider project is not dependent on agreements being reached with these other property owners (i.e. stage 1 is able to advance on a standalone basis if required).

Section 2: Project details

What is the project name?

Please write your answer here:

West Rangiora Residential Development

What is the project summary?

Please write your answer here:

To provide for a regionally significant residential development of approximately 24.58 hectares, delivering approximately 400-480 residential lots, with a longer goal to develop a total of approximately 40 hectares and a total of 700-780 residential lots on the western urban edge of Rangiora within a planned Future Development Area.

What are the project details?

Please write your answer here:

The projects purpose is to provide housing capacity at a regionally significance scale in the Greater Christchurch/Waimakariri region by delivering approximately 700-780 residential lots within a planned Future Development Area.

The objectives of the project are:

- (1) to deliver significant housing capacity to address the current and predicted demand for additional housing capacity in the Waimakariri District and the Greater Christchurch region.
- (2) to create an urban environment that is well connected with the existing Rangiora township and able to be serviced efficiently and effectively.

The project activities primarily involve subdivision and land development to create residential units along with associated road and service areas

Describe the staging of the project, including the nature and timing of the staging

Please write your answer here:

The project will be progressed in three stages over three years:

Stage 1: includes the land (i.e., the 24.58 hectares) in relation to which the applicant has formal agreements in relation to possible development of the land for residential subdivision(s). 400-480 residential lots are planned for stage 1.

Stage 2: subject to agreements being reached, the applicant will develop the remaining land in the ~40-hectare area, resulting in an additional 300 residential lots.

In practice the stages may be further split to reflect actual landholdings and demand at the time.

What are the details of the regime under which approval is being sought?

Please write your answer here:

Resource Management Act 1991

If you seeking approval under the Resource Management Act, who are the relevant local authorities?

Please write your answer here:

Waimakariri District Council
Canterbury Regional Council

What applications have you already made for approvals on the same or a similar project?

Please write your answer here:

Miranda Hales, Dorothy Stewart and John Woodward and Dalkeith Holding Ltd (the current owners of Stage 1 land), sought to enable all or part of the project through submissions on Variation 1 of the Waimakariri Proposed District Plan seeking to have the land rezoned to MRZ rather than retain the notified PWDP Rural Lifestyle zoning. Decisions on the Proposed District Plan are not expected until November 2024 with further appeals in relation to the wider plan process likely after that.

The applicant is confident that it they will eventually obtain rezoning/approval for the project (whether through resource consent or zoning change) but the timing and cost of this extremely uncertain. It will likely take many more years, at a significant cost to the applicant.

Is approval required for the project by someone other than the applicant?

Yes

Please explain your answer here:

Aside from the fast-track approval of land use and subdivision consents (that would otherwise be required from Waimakariri District Council), approvals would also be required from that Council in regards infrastructure connections. However, the applicant does not anticipate that there will be any capacity issues with respect to provision of reticulated services, and the land is immediately adjoining existing urban residential development so there are no servicing constraints which could delay development.

Stormwater discharge consents would also be required from the Canterbury Regional Council.

If the approval(s) are granted, when do you anticipate construction activities will begin, and be completed?

Please write your answer here:

Detailed design: Detailed design dependent on conditions of consent and measures to address flood hazard like bunding, and detention basins.

Procurement: Procurement of services relies on the applicants existing relationships with contractors used by the application for existing development

projects. However, the applicant expects this to be confirmed while consent process underway.

Funding: Funding for development dependent on outcome of Fast Track process.

Site works commencement: Construction commences six months after subdivision/land use and regional consents granted.

Completion: Project is delivered in stages over a period of three years.

Section 3: Consultation

Who are the persons affected by the project?

Please write your answer here:

Waimakariri District Council (as the relevant local authority).

Neighbouring landowners (recognising that this also includes those that own adjoining land that may ultimately form part of the 40 hectare area).

Detail all consultation undertaken with the persons referred to above. Include a statement explaining how engagement has informed the project.

Please write your answer here:

Waimakariri District Council: The applicant has engaged in initial discussions with Waimakariri District Council, including Mayor, Dan Gordon, who has indicated his support of the proposal.

Discussions with neighbouring landowners are ongoing.

Upload file here:

No file uploaded

Describe any processes already undertaken under the Public Works Act 1981 in relation to the land or any part of the land on which the project will occur:

Please write your answer here:

None anticipated.

Section 4: Iwi authorities and Treaty settlements

What treaty settlements apply to the geographical location of the project?

Please write your answer here:

N/A

Are there any Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019 principles or provisions that are relevant to the project?

No

If yes, what are they?:

Are there any identified parcels of Māori land within the project area, marae, and identified wāhi tapu?

No

If yes, what are they?:

Is the project proposed on any land returned under a Treaty settlement or any identified Māori land described in the ineligibility criteria?

No

Has the applicant has secured the relevant landowners' consent?

Yes

Is the project proposed in any customary marine title area, protected customary rights area, or aquaculture settlement area declared under s 12 of the Māori Commercial Aquaculture Claims Settlement Act 2004 or identified within an individual iwi settlement?

No

If yes, what are they?:

Has there been an assessment of any effects of the activity on the exercise of a protected customary right?

No

If yes, please explain:

Upload your assessment if necessary:

No file uploaded

Section 5: Adverse effects

What are the anticipated and known adverse effects of the project on the environment?

Please describe:

As part of the Proposed District Plan review process, a full set of planning evidence has been prepared in support of Miranda Hales and Dalkeith Holdings Ltd rezoning request. The evidence assesses the potential adverse effects associated with the project:

Visual amenity: changes to the amenity values are expected, however on balance, these changes are not adverse and consistent with the adjoining urban environment.

Reverse sensitivity: the separation created by roads to rural land minimises the potential for reverse sensitivity effects on future residential land.

Versatile soils: The site is within a Future Development Area identified in Chapter 6 of the Canterbury Regional Policy Statement. Therefore, the site is exempt from the NPS-HPL and the proposal will not result in any loss of versatile soil.

Geotechnical: There is no potential for adverse effects, expert reports have confirmed that "the Site is, in general, suitable for its intended use, with satisfactory conditions for future residential building development."

Contaminated land: There is no potential for adverse effects, a PSI investigation recommended targeted DSI and confirmed that the identified HAIL activities/risks do not preclude eventual residential subdivision of the land and do not require any further investigation.

Flooding: Any adverse effects associated with flooding can be adequately avoided or mitigated through specific engineering measures such as tactically positioned bunds. The land is not susceptible to any significant flood risks (the flood risk is low).

Traffic: any adverse effects associated with traffic can be mitigated or avoided through the provision of key roading connection identified in the West Rangiora Development Plan.

Servicing: The project is within the West Rangiora Development Area in which connections and upgrades are anticipated. The detailed design, location, capacity of all services can be assessed and determined at subdivision stage. Development contributions can be imposed to cover the costs of capital upgrades or as a service connection fee.

Ecological values: No specific ecological values for the site have been identified in the Proposed Waimakariri District Plan and there are no areas of indigenous vegetation. Therefore, there is no potential for adverse effects ecological values.

Upload file:

No file uploaded

Section 6: National policy statements and national environmental standards

What is the general assessment of the project in relation to any relevant national policy statement (including the New Zealand Coastal Policy Statement) and national environmental standard?

Please write your answer here:

Given the particulars of and the project, the following NPS are not relevant: the New Zealand Coastal Policy Statement, NPS for Renewable Electricity Generation 2011, NPS for Electricity Transmission 2008, NPS for Greenhouse Gases from Industrial Process Heat 2023.

No practices or effects are anticipated that would be inconsistent with the NPS for Freshwater Management 2020 or the NPS for Indigenous Biodiversity 2023. The land is not classified as highly productive land and therefore the project is consistent with the NPS for Highly Productive Land, to the extent that it is relevant.

The National Policy Statement on Urban Development 2020 (NPS-UD) is of particular relevance and the project strongly aligns with its objectives and policies.

Part of the Waimakariri District, including Rangiora, is a part of the Greater Christchurch urban area and 'urban environment'. It is clear that the proposal to provide for up to 780 residential sites will 'add significantly to development capacity' in the Waimakariri District. The NPS-UD provides a clear and intentional shift on how urban development around New Zealand is dealt with. While there is still some uncertainty in Canterbury around how this

applies against the Regional Policy Statement which has not yet been updated to reflect the shift reflected in the NPS-UD, the directions of the NPS-UD are clear and are directly promoted by this project:

Objective 1 of NPS the focuses on creating well-functioning urban environments to support social, economic, and cultural wellbeing, as well as health and safety. The project supports this objective by delivering a well-functioning urban environment through the provision of housing capacity, which enhances housing supply and choice, thereby supporting community wellbeing.

Objective 2 seeks to improve housing affordability by fostering competitive land and development markets. The project addresses constraints in the residential land supply markets, increases supply and competition, and contributes to housing affordability in the Waimakariri and Greater Christchurch.

Objective 3 aims to enable more people to live and businesses to operate in areas with employment opportunities, good transport links, and high housing demand. The project supports residential growth (and associated commercial centres) near existing employment centres, and has good accessibility to existing transport networks.

Objective 4 emphasizes that urban environments should evolve over time to meet the changing needs of communities. The project is seen as a response to evolving needs, consistent with this objective.

In addition, the sites are located in an area which has clearly been identified as a Future Development area in Plan Change 1 the Canterbury Regional Policy Statement, which was accepted by the Minister as giving effect to the NPS-UD. The NPS-UD policies further support the project and its alignment with the objectives, particularly in terms of providing diverse housing options, supporting businesses, ensuring accessibility, promoting competition in land markets, and addressing climate change resilience. In regard to development capacity, the project will deliver additional capacity in the short, medium and long term addressing a shortfall in long term capacity for Waimakariri District.

Overall, the proposal will meet the diverse needs of people and communities in the Waimakariri District a way that delivers on the key objectives and policies of the NPS-UD and will ultimately, contribute to a well-functioning urban environment.

File upload:

No file uploaded

Section 7: Eligibility

Will access to the fast-track process enable the project to be processed in a more timely and cost-efficient way than under normal processes?

Yes

Please explain your answer here:

Fast-tracking this project would enable construction of the project to commence much sooner than any available alternative process. If this project is unsuccessful in this fast-tracking application, the timing of the commencement is far less certain and may not occur until circa 2027+ following the conclusion of the Proposed District Plan review and appeals, subsequent district change processes to rezone the land, and subdivision consent applications.

The slow speed, high cost and uncertainty associated with these conventional planning processes is a significant deterrent to investors, has opportunity costs (from not enabling development in the interim) and in some way or another has contributed to the current shortage of residential land in Greater Christchurch. The applicant needs more certainty at an earlier stage than the other processes can offer in order to be able to make certain decisions and investments in relation to the project.

For context it is noted that the applicant has a much smaller application before Waimakariri District Council for resource consent in relation to a 15 lot subdivision on a different nearby property (70 Oxford Road). The application has been in process for over 18 months and subject to 5 requests for further information (with no clarity on when a decision might be forthcoming).

The Fast-Track Approvals Bill 2024 was introduced with a specific purpose to provide a streamlined decision-making process that facilitates the delivery of infrastructure and development projects with significant regional or national benefits. Essentially, it aims to expedite approvals for projects that contribute to the overall well-being and growth of communities.

Fast-tracking this project under the Fast Track Approvals Bill 2024 would bring several specific benefits:

- **Addressing Residential Land Shortage:** The project directly addresses the current shortage of residential land in this part of the Waimakariri District and Greater Christchurch urban environment. Fast-tracking would allow this issue to be addressed more quickly.
- **Accelerated Commencement:** Fast-tracking would enable the project to commence in as soon as practicable after fast track approval being obtained. Without fast-tracking, the project may not start until 2027+, if at all, due to the time-consuming and highly uncertain conventional planning processes.
- **Opportunity Cost Reduction:** Fast-tracking reduces opportunity costs associated with delays. Enabling development and its associated economic benefits sooner, captures opportunities that would otherwise be lost or delayed whilst awaiting the conclusion of lengthy planning processes.
- **Economic Growth and Job Creation:** The project will stimulate economic growth and create jobs, both during construction and through the residential activity supporting the wider community. Fast-tracking would bring these benefits to the community sooner.

In summary, fast-tracking this project would accelerate its benefits, attract investors, reduce opportunity costs, address residential land shortages, and stimulate economic development and job creation.

What is the impact referring this project will have on the efficient operation of the fast-track process?

Please write your answer here:

Referring this project will not negatively impact on the efficient operation of the fast-track process for the following reasons:

- **Project Alignment with Bill's Purpose:** The proposed project aligns with the bill's core purpose, which is to expedite infrastructure and development projects with significant regional or national benefits. By addressing housing sufficiency the project directly contributes to regional well-being and growth.
- **Clear Objectives and Scope:** The project's objectives are well-defined: deliver approximately 400-480 residential lots in a short timeframe, with a long term goal to deliver a total of 700-780 residential over an approximately 3 year period. Clarity in project scope ensures that decision-makers can assess its merits efficiently without unnecessary delays.
- **Balancing Speed with Rigorous Assessment:** The bill aims for fast-track approval, without compromising on rigorous assessment. The site has already been included as Future Urban Area in the Greater Christchurch Spatial Plan 2024. This minimises any risk of decision making in an expedited manner.
- **Efficient Use of Resources:** By fast-tracking a project that is ready to commence and has clear regional benefits, the decision-making body can focus its resources on projects that are ready to proceed, rather than spending time on projects that are not yet ready or do not align with the Bill's purpose.

In summary, referring this project will not hinder the efficient operation of the fast-track process. It strikes a balance between speed and thoroughness, aligns with the Bill's purpose, and addresses critical needs in the community.

Has the project been identified as a priority project in a:

Local government plan or strategy

Please explain your answer here:

The project has not been specifically identified on any of the strategies above. However, West Rangiora was identified as an Area into which the Rangiora township can expand providing for compact urban form, well-functioning urban areas and an ability to be services in the Waimakariri District Development Strategy 2013. In addition, the land has also been identified as a Future Urban Area in the Greater Christchurch Spatial Plan 2024 (Map 2) and as a Future Development Area in the Christchurch Regional Policy Statement.

Will the project deliver regionally or nationally significant infrastructure?

Not Answered

Please explain your answer here:

Project is a residential development proposal (or regional significance given its size and location)

Will the project:

increase the supply of housing, address housing needs, contribute to a well-functioning urban environment

Please explain your answer here:

Increased Housing Supply: The project's primary purpose is to deliver an initial 400-480 new residential sites and eventually, an additional 300 residential sites (a total of 700-780 new residential sites). By creating these sites, it directly contributes to increasing housing supply.

Addressing Housing Needs: The shortage of housing in New Zealand is a critical issue. The project's focus on housing sufficiency directly addresses this need. By enabling the creation of new residential sites, the project contributes to meeting the demand for housing in the Waimakariri District.

Well-functioning Urban Environment: The project will contribute to well-functioning urban environments, especially given its location adjoining the existing Rangiora urban area (as is consistent also with its inclusion as a Future Urban Area in the Greater Christchurch Spatial Plan 2024).

Will the project deliver significant economic benefits?

Yes

Please explain your answer here:

The proposed project has the potential to deliver significant economic benefits by fostering growth, improving infrastructure, and meeting housing demands.

The creation of new residential sites directly contributes to increasing housing supply. More available housing options attracts new residents, stimulates local economies, and generates economic activity.

The project will create jobs and increase employment in the region. A significant amount of work will be made available, particularly with regard to the construction of the project. In addition, the residential development will bring expenditure, incomes and employment opportunities for local businesses and residents within the Waimakariri District.

Overall, by addressing housing needs, the project enhances the economic vitality of the local area and Waimakariri District generally. Economic benefits include increased job creation and business growth.

Will the project support primary industries, including aquaculture?

No

Please explain your answer here:

Will the project support development of natural resources, including minerals and petroleum?

No

Please explain your answer here:

Will the project support climate change mitigation, including the reduction or removal of greenhouse gas emissions?

No

Please explain your answer here:

Will the project support adaptation, resilience, and recovery from natural hazards?

No

Please explain your answer here:

Will the project address significant environmental issues?

No

Please explain your answer here:

Is the project consistent with local or regional planning documents, including spatial strategies?

Yes

Please explain your answer here:

Greater Christchurch Spatial Plan: The project is consistent with the Greater Christchurch Spatial Plan that was adopted in March 2024 by all Partner Councils (Christchurch City Council, Selwyn District Council, Waimakariri District Council and Environment Canterbury). Specifically, the project site is partly identified in the Spatial Plan as an 'Future Urban Area on Map 2 (the Greater Christchurch spatial strategy 1 million people) and Map 14 (Broad locations of housing and business development capacity (700,000 people)). The project meets all the criteria listed for broad locations for greenfield development.

The Waimakariri District Development Strategy 2018 (DDS): The project is consistent with and will help give effect to the DDS. The DDS sets out a District-wide look into the future that the Council must have regard to under section 74(2)(b)(i) of the Resource Management Act 1991. It sets out an approach to growth and urban form at Rangiora to provide for an additional 5025 households by 2048, with Rangiora continuing to accommodate one third of the district residential growth. West Rangiora is identified as an area into which the town can expand providing for compact urban form, well-functioning urban areas and an ability to be serviced.

Canterbury Regional Policy Statement (CRPS): The proposal is consistent with the CRPS. The site is in the Greater Christchurch sub region, and subject to Chapter 6 of the CRPS. This Chapter contains the relevant regional planning provisions relating to settlement growth for Rangiora. The Chapter provides a resource management framework for the recovery of Greater Christchurch, to enable and support earthquake recovery and rebuilding, including restoration and enhancement, for the area through to 2028. In 2019 the Greater Christchurch Partnership prepared Change 1 to the CRPS in response to the 2018 Housing and Business Capacity Assessments (HBCAs) required by the National Policy Statement on Urban Development Capacity 2016 (NPS-UDC).

That assessment showed that Selwyn and Waimakariri Districts did not have sufficient development capacity to meet their statutory obligations under the NPS-UDC. The response was to amend Map A Greenfield Priority Areas of the CRPS to include Future Development Areas (FDA's), including in Rangiora and this site. All of the FDAs are within the Projected Infrastructure Boundary on Map A. Change 1 was approved by the Minister in May 2021 following a Streamlined Planning Process.

Development of the site for residential activity is consistent with Policy 6.3.12. This Policy provides for the re-zoning of land within the FDAs, through district planning processes, in response to projected shortfalls in feasible residential development capacity over the medium term.

Proposed Waimakariri District Plan (PWDP): As notified in 2021 the PWDP included the Rangiora West Development Area set out in an ODP (Outline Development Plan). The RWDA takes in the FDA including this site. The ODP provides the overarching basis for the key structural components that will shape the form and servicing of the RWDA. The inclusion of the RWDA in the PWDP confirms that the Council has satisfied itself that:

- (a) infrastructure is either in place or able to be economically and efficiently provided to support the urban activity.
- (b) provision is in place or can be made for safe, convenient and sustainable access to community, social and commercial facilities and
- (c) the objective of urban consolidation continues to be achieved (Policy 6.3.11(5) CRPS).

Variation 1 to the PWDP: Variation 1 is intended to give effect to the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 and introduces the mandatory medium density residential standards to the PWDP for General Residential zoned land.

Submissions on Variation 1 by the landowners seek to have 63 Oxford Road, 212 Johns Road and 126 Lehman's Road (combined area 24.6 ha) rezoned medium density residential rather than retain the notified PWDP Rural Lifestyle zoning, with an uncertain certification process to enable residential subdivision and development (notwithstanding the rural lifestyle zoning). The subdivision and development of the site to medium density residential standards is consistent with the planning outcomes sought by Variation 1.

There are no submissions seeking medium density rezoning of the other parcels of land subject to this application.

If a notified certification process is not retained in decisions on the variation (which seems likely based on caucusing that has occurred as a part of the hearing process on the topic), then this land will remain zoned rural lifestyle and rezoning will need to wait for future private plan change processes to enable residential subdivision and development.

If this occurs then the Council will not be meeting its mandatory requirement under the NPS-UD to provide at least sufficient housing capacity to meet housing needs in the short, medium and long term.

The s32 Report for the Variation states at section 6.1 (p27) "the proposed provisions are closely aligned with and give effect to the CRPS (Chapter 6 and the Proposed Change 1 to the CRPS6) and National Policy Statement on Urban Development 2020 provisions, including Objective 6 (c) as the Development Areas chapter is supporting the creation of between 5,000 to 7,000 new dwellings in Rangiora and Kaiapoi (p27)"

Anything else?

Please write your answer here:

Does the project include an activity which would make it ineligible?

No

If yes, please explain:

Section 8: Climate change and natural hazards

Will the project be affected by climate change and natural hazards?

No

If yes, please explain:

Section 9: Track record

Please add a summary of all compliance and/or enforcement actions taken against the applicant by any entity with enforcement powers under the Acts referred to in the Bill, and the outcome of those actions.

Please write your answer here:

There have been no compliance and/or enforcement actions taken against the applicant by any entity with enforcement powers under the Acts referred to in the Bill.

Load your file here:

No file uploaded

Declaration

Do you acknowledge your submission will be published on environment.govt.nz if required

Yes

By typing your name in the field below you are electronically signing this application form and certifying the information given in this application is true and correct.

Please write your name here:

Ben Dormer

Important notes