

Additional Responses referred to in the Body of the Application

12A

Part III: Project Details

Construction readiness

The owners and directors of BRL are experienced land developers with a strong track record of delivering multiple lot residential development and residential housing.

BRL already holds significant working capital and does not anticipate any difficulty securing additional funding. Discussions have already commenced with banks and second tier funders that Westpark and Mike Greer Homes Ltd have used in the past. Funding arrangements will be formalised once BRL has more certainty regarding the resource consent processes. For example, should the Minister approve this application for referral to the EPA then BRL will immediately formalise funding and other matters including a marketing programme, website development etc.

BRL is working to a timeline whereby contractors will be ready to commence construction activities as soon as the necessary resource consents are available. For example, assuming Fast Track referral is approved and the EPA issues resource consents for the Proposal by the end of 2021, BRL anticipates civil construction works will commence in January 2022.

To facilitate this outcome, BRL intends to complete detailed engineering design for the Proposal in parallel with the processing of this Fast Track application.

Work is already underway on the several technical assessments required to inform the resource consent applications and detailed design, and further assessments will be commissioned during the next 2 weeks.

As mentioned above, Stage 1A will yield approximately 132 lots and Stage 1B will yield approximately 77 lots. Key milestones for each Stage are detailed below.

Detailed design and construction programme		
Start Date	Task	Duration
1 May 2021	Lot layout and scheme plan	1 month
1 June 2021	Engineering detailed design for Stage 1A and Stage 1B	3-5 months
1 Sept 2021	WDC approval of detailed design plans for Stage 1A and Stage 1B Schedule of quantities for Tender documents for both Stages	1-2 months
1 Oct 2021	Tender notified (invite only)	1 month
1 Nov 2021	Contractor selected and terms of contract agreed and signed for both Stages	1 month
1 Dec 2021	Contractor site set up	1 month

Stage 1A Site Works and Titles		
Start Date	Task	Duration
Early Jan 2022	Civil construction (earthworks, infrastructure, roading)	6-8 months
1 August 2022	Housing construction ^[1]	6-18 months

	1 Sept 2022	Seek new titles from LINZ one month from completion of civil works and issue of s224(c) certificate	1 month
Stage 1B Site Works and Titles			
Start Date	Task	Duration	
1 August 2022	Civil construction (earthworks, infrastructure, roading)	4-6 months	
1 Feb 2023	Housing construction ^[2]	6-18 months	
1 Feb 2023	Seek new titles from LINZ one month from completion of civil works and issue of s224(c) certificate	1 month	
^[1] Housing construction may commence before 1 August 2022 on some sites. Substantially underway by Q4 2022			
^[2] Housing construction may commence before 1 February 2023 August on some sites. Substantially underway by Q2 2023			
12B	Part VII: Adverse Effects		
The AEE that will accompany the applications for resource consent required for the Proposal will be prepared in accordance with Clause 9(4), Clauses 10(1)(a), (c), (d) and (g) and Clause 11 of Schedule 6 of the Fast Track Consenting Act, which require an assessment of: - the actual and potential effects on the environment; - any effect on the people in the neighbourhood and, if relevant, the wider community, including any social, economic, or cultural effects; - any physical effect on the locality, including landscape and visual effects; - any effect on ecosystems, including effects on plants or animals and physical disturbance of habitats in the vicinity; - any effect on natural and physical resources having aesthetic, recreational, scientific, historical, spiritual, or cultural value, or other special value, for present or future generations; - any discharge of contaminants into the environment and options for the treatment and disposal of contaminants; - the unreasonable emission of noise; and - any risk to the neighbourhood, the wider community, or the environment through natural hazards or hazardous installations. A number of technical and other assessments have and will be commissioned by BRL to inform the AEE. These assessments are referenced in Appendix 8. The following presents a general description of the anticipated and known adverse effects of the Proposal on people and the environment, in sufficient detail to inform the Minister's decision on this application for referral. The analysis has been prepared with input from the appropriate specialists and represents the opinions of those specialists. General Construction Effects The Proposal's land development engineers (Aurecon) have identified the following general construction effects associated with the Proposal:			

- *construction traffic* will be managed by a Construction Traffic Management Plan that will broadly cover:
 - construction dates and hours of operation
 - truck routes
 - temporary traffic management signage
 - details of site access/egress
 - measures to protect pedestrians
- *construction noise and vibration effects* are predicted to comply with NZS 6803: 1999 *Acoustics – Construction noise* and other applicable standards, subject to the implementation of appropriate mitigation measures and adherence to industry best practice methodologies
- *construction-phase stormwater* will be managed by an Erosion and Sediment Control Plan and conditions of resource consent to ensure that all practicable measures are implemented to minimise the potential for any discharges of sediment, including:
 - staging of earthworks and minimising exposed areas
 - clean and dirty water diversion channels and bunds
 - silt fences
 - sediment retention pond
 - containment of runoff within excavation areas and conveyance to sediment retention pond
 - re-vegetating and rehabilitating exposed areas as soon as practicable following completion of earthworks
- *dust* generated during earthworks activities will be managed by standard practices to prevent dust nuisance, including such measures as:
 - staging works to minimise the area of soil exposed to the wind, and providing shelter from wind
 - optimising site layout to minimise travel distances
 - controlling vehicle speeds within the site
 - minimising track out of dirt on vehicle wheels
 - minimising drop heights when loading and unloading vehicles, and limiting stockpile heights
 - consolidating loose surface material
- *potentially contaminated soil* will be managed by the implementation of appropriate controls and conditions of resource consent to manage risks to human health. Site controls will be documented in a Site Management Plan.
- *potential discovery of archaeological matter* will be managed by a standard archaeological discovery protocol. The Stage 1 Land does not contain any known archaeological values of significance.

The abovementioned management plans, and the standard suite of conditions typical of greenfield development consents, will specifically address the potential construction effects

associated with the Proposal. Overall, it is considered that construction-related effects will be temporary, characteristic of urban land development activities, appropriately managed, not at unreasonable levels, and less than minor.

Transport Effects

The Proposal will generate traffic with consequential effects on the surrounding road network. It is expected that the level of traffic generated by the Proposal can be accommodated on the surrounding road network, with minimal effects on the safety and efficiency of that network.

Traffic modelling undertaken by WDC has tested Rangiora's proposed Structure Plan Areas. For the DSP specifically, the Paramics modelling indicates:

- the majority of the traffic generated by the DSP area links into the greater transport network towards the south and to the west
- Kippenberger Avenue, East Belt and MacPhail Avenue (which provides a direct connection between the northeast and the Eastern Arterial) are the primary connections for DSP area traffic as it heads towards the town centre and further south in the morning peak (AM peak), and traffic returns by the same routes in the evening peak (PM peak)
- much of the loading within the DSP Area falls on the primary north-south route (part of which will be constructed by the Proposal), which forms an extension of the Eastern Arterial corridor and MacPhail Avenue
- the east-west link in the southwest of the DSP Area (outside of the Stage 1 Land) that connects into East Belt also carries a moderate proportion of the traffic generated
- intersections on the boundaries of the DSP Area perform within capacity
- the High Street / Kippenberger Avenue / East Belt roundabout shows moments where the flow of traffic begins to break down, but these recover quickly and overall intersection LOS A in both periods.

In terms of walking and cycling networks, the main north-south spine road extending north from Kippenberger Avenue will include a separated shared pedestrian/cycleway. Secondary and local roads will be provided with walking and cycling facilities, as appropriate to their road widths, traffic volumes and vehicle speeds. Further, shared paths will be incorporated into esplanade reserves. Overall, the Proposal will be well connected from a walking and cycling perspective, with appropriate connections throughout the development and to the surrounding road network and urban environment.

The AEE for the Proposal will be supported by a specialist transport assessment, however based on the key findings of the modelling commissioned by WDC (noting the Stage 1 Land represents less than 15% of the DSP area), the existing transport network is considered appropriate for the Proposal, and able to readily accommodate the additional traffic generation.

Urban Design, Character and Amenity Effects

The Proposal's urban designer and landscape architect (Rough and Milne Landscape Architects) have identified the following potential impacts of the Proposal on character and amenity values:

- effects on the wider context
- effects on the surrounding road and open space network
- effects on residents of immediately neighbouring properties

- landscape and visual effects
- on-site amenity

Given the current rural zoning and undeveloped nature of the Stage 1 Land, the Proposal will result in considerable change to the existing character and amenity values of the site. The extent of that change will vary depending on a number of factors, including proximity and viewpoints, locational relationship to different components of the Proposal, the layout and configuration of existing development, and the location and extent of intervening vegetation. However, the Proposal is expected to integrate well with the character and amenity of the surrounding environment, both in its current and planned future state.

The layout of the subdivision will be aligned with the DSP, with all proposed allotments of a suitable size for their intended purpose, and able to be appropriately serviced and accessed. Bulk and location parameters, combined with appropriate conditions of consent, will ensure that residential development achieves visual amenity, spaciousness, privacy, access to sunlight and daylight, and a building scale commensurate with the density and form of development anticipated in this Future Development Area.

The Proposal is consistent with the pattern of urban growth and residential development anticipated by the DSP, the Future Development Areas identified in PC1 RPS (in response to the NPS-UD), and WDC's intentions for the Proposed District Plan in terms of implementing these higher order documents. As such, the visual change that will be experienced is considered appropriate in the context of the future anticipated development outcome for the Stage 1 Land, and indeed the entire DSP area.

Overall, the Proposal will result in a high-quality residential environment, with any actual or potential adverse effects on character and amenity values able to be managed through considerate subdivision layout and design, integrating and enhancing connectivity to the surrounding environment.

Geotechnical Effects

The Proposal's geotechnical engineers (Aurecon) have undertaken preliminary geotechnical investigations to confirm the underlying ground conditions and to provide preliminary recommendations for the Proposal. The investigations have confirmed the Stage 1 Land is suitable for the Proposal and that all geotechnical considerations can be appropriately managed during the detailed design phase.

The Proposal is to be located on a large relatively flat area of farmland immediately east of Rangiora township. The preliminary geotechnical investigations comprised a review of readily available information, intrusive investigations including geotechnical boreholes and cone penetrometer testing (CPT). The Stage 1 Land is primarily characterised by relatively competent soils (silt and sand) overlying alluvial gravels from shallower depths, and the ground conditions are unlikely to pose any significant geotechnical issues to the Proposal. Preliminary recommendations for foundations, infrastructure and pavements have been provided.

It is considered that geotechnical matters will not generate any issues that will result in noticeable effects on the environment or adjacent properties.

Versatile Soils Effects

The CRPS defines "versatile soils" as land classified as Land Use Capability I or II in the New Zealand Land Resource Inventory. As shown in **Figure 1** of **Appendix 9**, two-thirds of the Stage 1 Land consists of Class III Soils (approximately 14ha, or 68%), with the remaining one-third comprising Class II Soils (approximately 6.6ha, or 32%). The Stage 1 Land does not contain any Class I Soils. Existing residential development south of Kippenberger

Avenue occupies Class II Soils. As noted above, the Stage 1 Land, and indeed BRL's entire landholding, has been identified for future residential growth in various strategic and statutory planning documents of WDC and CRC, in response to the NPS-UD. For these reasons, no technical assessment of the Proposal's actual or potential effects on versatile soils has been, or is intended to be, undertaken.

Soil Contamination Effects

The Proposal's contaminated land engineer (Malloch Environmental Limited) has prepared a Preliminary Site Investigation (**PSI**) that has identified evidence of, and/or the potential for, activities or industries described in the Hazardous Activities and Industries List occurring on the site now or in the past. The PSI has identified contamination around the existing Homestead and farm working yard from the use of lead-based paint on old buildings, a small above ground diesel tank, and stored treated timber. Although no specific evidence was found, the PSI reports a risk of old farm pits being present and possible sheep dip or spray race use, simply associated with the site's historical farming uses since pre-1900's.

The remainder of the Proposal Land, and indeed the balance of the Applicant's landholding, has been used for general pastoral use for its known history, with historic sheep farming and more recently for dairying. This pastoral use is unlikely to have caused soil contamination that would pose a risk to human health or the environment.

The AEE supporting the resource consent applications will be supported and informed by a Detailed Site Investigation (**DSI**) and, if required, a draft Remediation Action Plan (**RAP**) to assess the extent of contamination and provide appropriate methods to remediate the soil prior to any works, subdivision or use of the Stage 1 Land.

Ecological Effects

The Proposal's ecologists (Aquatic Ecology Limited, AEL) have evaluated the ecology of the headwaters of the Cam River and the swale network upgradient and to the west of the Stage 1 Land, as well as the historic flow path channel to the north of the Cam River. The Stage 1 Land, and perennial reaches downstream, were subject to survey by AEL on 15 March and 21 April 2021.

AEL have also been involved with mapping trout spawning grounds in the upper Cam River/Cam River (Coldstream) area for WDC in 2005, 2012 and 2017. On all three occasions, winter baseflow surface water terminated beyond the eastern boundary of the Stage 1 Land. These three ecological studies have indicated that in recent past, there has not been permanent surface water within the Stage 1 Land.

AEL's investigations have concluded that the Stage 1 Land contains no permanent aquatic habitat of natural origin. Downstream of Kippenberger Avenue (beyond the Stage 1 Land and BRL's landholding) aquatic values, both for fish and invertebrates, indicate "good" stream health.

To this end, AEL consider there is no ecological reason for an esplanade reserve along the Cam River of more than 10m width, although this width is preferred for sediment and nutrient control. As there is no permanent aquatic habitat, nor even a presence of ephemeral biota, within the Stage 1 Land, AEL consider the ecological function of any esplanade reserve only need be aligned to protecting the ecological habitats downstream of Kippenberger Avenue, i.e. of sufficient width to support the banks of the Cam River during flood flows and to reduce nutrient inputs and trap sediment from sheet flow.

AEL found no indication of any ecological values along the historic flow path channel and given the absence of surface water it will not support aquatic life or water bird life. AEL do

not consider there any ecological need to set an esplanade reserve on either side of the flow path channel.

Together with specialist landscape assessment (Rough and Milne Landscape Architects), AEL's ecological assessment will inform rehabilitation measures, esplanade buffers and riparian design elements to protect, maintain and, where possible, enhance ecological values. Construction methodology and conditions of resource consent (in terms of CLWRP and NES-F) will ensure ecological effects are appropriately managed.

Servicing

Water Supply

An existing 200mm diameter water main running along Kippenberger Avenue was installed to service development on the south side of Kippenberger Avenue and ready the area for future development. WDC has confirmed there is sufficient capacity in this existing water network for an additional 350 equivalent residential connections without requiring upgrades to the network.

A new 200mm diameter main will be connected to the existing network to service the Proposal. This will enable connection back to East Belt at a later date, creating a ring main to support future development of the North East Rangiora Future Development Area.

The Proposal's secondary roading network will be serviced by 150mm lines, with a 100mm diameter network installed for local roads. 63mm diameter submains will be run off these mains to provide individual connections to all lots.

The Stage 1 Land is within the Gazetted Rangiora Fire District and the proposed water supply network will deliver firefighting protection to all lots of the Proposal.

Wastewater

There are currently two gravity lines running along Kippenberger Avenue that are available to service the Proposal from a wastewater perspective. Both discharge to the south, via MacPhail Avenue and Devlin Avenue respectively. WDC has confirmed that together these lines have capacity for an additional 749 residential lots (MacPhail Avenue line 673 lots and Devlin Avenue line 76 lots). Both lines could be extended across Kippenberger Avenue to service the Stage 1 Land, and provide options for the distribution of lots to be served by each. Development of the balance of the North Rangiora Future Development Area will require a pumped system, which could also be brought forward to service the Stage 1 Land (or part thereof) if required.

The final wastewater solution for connecting the Stage 1 Land to WDC's existing reticulated network will be confirmed via the detailed design process with WDC Engineers, with the aim of maximising the existing gravity capacity for the Proposal and future-proofing the system for the remainder of the DSP area.

Stormwater Management

The Proposal will be served by stormwater facilities located in two areas on the northern and southern side of the Cam River at the eastern extent of the Stage 1 Land. The concept design for the proposed stormwater management system comprises:

- treatment of first flush volume, the 90% storm depth as per NZTA stormwater treatment specifications;
- discharge via rapid soakage for all 2% AEP up to the critical event, a minimum detention volume sized for to the 5% AEP 18-hour storm event;

- flows exceeding the detention pond capacity will discharge to the Cam River via an appropriately designed weir system, which is the natural flow path for this area; and
- each lot will have a private soak pit sized for the roof area.

Overall, stormwater can be managed within the Stage 1 Land to avoid adverse impacts on downstream networks and properties. The overall management regime will be designed in accordance with best practice, and to achieve consistency with the relevant requirements of WDC and CRC.

Flood Management

The Stage 1 Land is considered suitable for development from a flood management perspective.

Modelling results (based on work completed by WDC, CRC and BRL) show that the Stage 1 land is only susceptible to minor flooding during a 1:200-year event, should the Ashley River (some 1.8km distant from the site) breach its stop banks. The site is not otherwise subject to flooding in more frequent events.

The pre-development risks associated with the 1:200-year event will be addressed through the detailed design of both the stormwater reticulation network and controlled diversion of flow paths, as well as the establishment of minimum floor levels for dwellings, as required. It is important to note that the level of risk to downstream properties and buildings will be reduced from pre-development conditions, as there will be better management of the network and overland flow paths, in tandem with specifically designed and comprehensive treatment and attenuation systems.

The path in the 1:200-year event generally follows three existing natural flow paths through the Stage 1 Land from the western boundary. The southernmost of the three is the Cam River, a well-defined channel with no observed base flow between the western boundary and the middle of the property. Just north of this a second shallow flow path leads to the Cam River and carries a relatively small flow in a 1:200-year event. This joins the Cam River approximately 250m east of the western boundary. The northernmost flow path is shown by hydraulic modelling to be a broad, shallow conveyance only during 1:200-year event. The modelling indicates several locations where flow breaks out of the northern channel will travel overland to the Cam River in wide, shallow flow paths which generally have a flow depth less than 100mm.

To facilitate the Proposal, several options for minimising the flow path extents under the 1:200-year scenario have been investigated. As the northern channel is responsible for most of the flow path impacts, the options investigated consider ways to mitigate this impact. Preliminary discussions with WDC have identified the need to ensure existing flow patterns are maintained. Stormwater analysis has been undertaken accordingly.

The peak flow rates across the Stage 1 Land have been established at five locations upstream and downstream of the site. It is noted that these locations encompass downstream properties, which includes spillage between the channels. Most of the flow from the northern channel sheet flows across the Stage 1 Land and downstream properties and enters the Cam River. Thus, the options investigated consider ways to maintain these flow rates across the site within the existing natural flow paths.

It is proposed to establish a cut-off channel connecting the northern channel to the Cam River along the western boundary, consolidating the majority of the flow ($\sim 7 \text{ m}^3/\text{s}$) into the Cam River through the Stage 1 Land, maintaining the required northern flow rate ($1.3 \text{ m}^3/\text{s}$) as a smaller, shallower flow path. This would simplify the required weirs and cut-off structures and greatly reduce the required area for the northern channel, thus maintaining the low northern flow rate as a smaller, shallower flow path. In this way the potential

	breakout during a 1:200-year event will be better managed than the pre-development scenario, with no increase in flow to the Cam River. Overall, the flood management solution will achieve a resilient development outcome, with reduced risk for downstream properties. <u>Electricity and Telecommunications</u> There is existing electricity and telecommunications infrastructure along Kippenberger Avenue. It is expected that the existing services will be able to cater for the Proposal. Overall, conceptual designs have not identified any servicing constraints, with the Proposal able to be appropriately connected and served by existing reticulated networks. Appropriate conditions of consent will ensure the Proposal meets the relevant environmental and infrastructure standards. Summary The anticipated and known adverse effects arising from the Proposal have been outlined above. The nature and scale of these adverse effects will be refined through detailed specialist assessments supporting the resource consent applications, however preliminary assessments indicate they are not considered to be significant. The effects of the Proposal are anticipated in this location by virtue of provision for urban development outcomes in the DSP area and as signalled by the Future Development Area under PC1 to the RPS, both of which respond to the directives of the NPS-UD. The Proposal will achieve an appropriate balance between amenity and visual effects and the provision of residential development on what is currently vacant rural land. The design approach respects the core principles and elements of the DSP and will carefully integrate urban design considerations and landscape mitigation solutions to arrive at a residential outcome that complements its setting and results in no more than minor adverse effects on the receiving environment.
12C	Part VIII: NPS & NES National Policy Statement on Urban Development 2020 (NPS-UD) The NPS-UD identifies Rangiora (as part of the Greater Christchurch region) as a 'Tier 1 Urban Environment', reflecting the area's population size and high growth rate. In broad terms, the NPS-UD recognises the national significance of: - 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; and - providing sufficient development capacity to meet the different needs of people and communities. The NPS-UD contributes to the Urban Growth Agenda, which aims to remove barriers to the supply of land and infrastructure to allow cities and towns to grow up and out. The NPS-UD does this by addressing constraints in the current planning system to ensure growth is enabled and well-functioning urban environments are supported, and setting out objectives and policies that Councils must give effect to in their resource management decisions. The NPS-UD directs decision-makers to have particular regard to the benefits of urban development that are consistent with well-functioning urban environments, including: - provision of a variety of homes in terms of typology, price, location and different households

- proximity to urban centres
- supporting reductions in greenhouse gas emissions
- responding to the effects of climate change

The overall intent of the NPS-UD is clear in that where out-of-sequence urban growth and intensification is practical, Councils are required to be responsive to such proposals, particularly where these would supply significant development capacity. The NPS-UD also directs decision-makers to have particular regard to the planned urban built form anticipated by planning documents that have given effect to the NPS-UD, which may involve significant changes to an area. CRC is in the process of updating the RPS to give effect to the NPS-UD via a Streamlined Planning Process. PC1 RPS identifies the DSP area as a 'Future Development Area'. The WDP has not been reviewed and updated to give effect to the NPS-UD, however WDC has commenced its District Plan Review process which will align with PC1 RPS, the DSP and the NPS-UD.

The NPS-UD notes that changes to the urban built form of an area *'may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and are not, of themselves, an adverse effect'*. It is also relevant that the NPS-UD directs that planning should promote accessibility and connectivity between housing and business, and that choices should be provided to meet the needs of people and communities for a range of dwelling types and locations, working environments and places to locate businesses. The Proposal would contribute to these choices.

Overall, the Proposal aligns with the matters in the NPS-UD set out above, and specialist technical assessments supporting the resource consent applications will demonstrate the positive contribution the Proposal will make for current and future generations.

National Policy Statement for Freshwater Management 2020 (NPSFM)

The NPSFM sets out the objectives and policies for freshwater management, including:

- recognition of Te Mana o te Wai in freshwater management;
- reflection of tangata whenua values and interests in decision making;
- improving degraded water bodies using bottom lines as defined in the NPS;
- safeguarding and enhancing the life-supporting capacity of water and associated ecosystems, including threatened ecosystems;
- working towards targets for fish abundance, diversity and passage; and
- an integrated approach to management of land and freshwater and coastal water.

The Stage 1 Land contains the Cam River and an overland flow path not classified as a watercourse. Preliminary ecological and landscape assessments have identified some downstream ecological and water quality values, and opportunities to rehabilitate the Cam River within the Stage 1 Land through selective vegetation clearance, bank re-grading, appropriate riparian planting and buffer setbacks. The Proposal will be readily able to control any sediment runoff into any waterbodies, given the flat topography and the implementation of appropriate sediment control measures. The Proposal is not expected to compromise any outcomes anticipated in the NPSFM.

	National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health 2011 (NES-CS) The NES-CS is a nationally consistent set of planning controls and soil contaminant values. As a higher-level policy document, the NES-CS does not include specific objectives and policies, but rather is used as a tool to implement the purpose of the RMA. It ensures that land affected by contaminants in soil is appropriately identified and assessed before it is developed – and if necessary, the land is remediated, or the contaminants contained to make the land safe for human use. The NES-CS does apply to the Stage 1 Land and resource consent is required for the Proposal, being subdivision, change of use, and disturbing soil of a 'piece of land'. As noted above, the AEE supporting the resource consent applications will be supported and informed by a DSI and, if required, a draft RAP to assess the extent of contamination and provide appropriate methods to remediate the soil prior to any works, subdivision or use of the Stage 1 Land. The nature and extent of potential soil contamination identified in the PSI is not atypical of greenfield development, and is expected to be readily addressed through best practice industry standards and processes, such that the Proposal will be consistent with the NES-CS. National Environmental Standards for Freshwater (NES-F) The NES-F aims to regulate activities that pose risks to freshwater and its ecosystems, prescribing standards for activities in or around natural watercourses and wetlands. Given the presence of the Cam River within the Stage 1 Land, the NES-F is relevant to the Proposal. It is anticipated resource consent will be required under the NES-F in respect of activities associated with the realignment of the Cam River and the installation of culverts to facilitate roading access over the Cam River. It is expected that those activities subject to the NES-F can be readily designed and managed to ensure the Proposal achieves consistency with the NES-F.
12D	Part IX: Purpose of the Act Economic benefits and costs The Proposal will result in significant additional direct and indirect employment in Rangiora and the wider Waimakariri District and Greater Christchurch region, particularly in the land development and construction industry, and operational employment (in terms of the commercial development opportunities): - In 2022, 12 direct FTE jobs will be created in the planning/design/consent stages, with a further 7 FTE jobs created indirectly in sectors that support planning/design/consent. - In 2023, 37 direct FTE jobs will be created in the earthworks and local infrastructure stages, with a further 53 FTE jobs created indirectly in sectors that support earthworks and local infrastructure. - In 2024, 171 direct FTE jobs will be created in house construction, with a further 315 FTE jobs created indirectly in sectors that support house construction. - In 2025, 9 direct FTE jobs will be created in sectors that support house sales, including marketing agencies, realtors, and conveyancing lawyers. In addition, a further 9 indirect jobs will be created in sectors that support the tasks associated with house sales. The Proposal will also provide spin-off benefits to the local retail economy from having more people living and working in the area. The resulting GDP contribution is a public benefit in

that it contributes to the productivity of the wider economy. In addition, the Proposal will ultimately facilitate the progressive development of the balance of BRL's land that is also identified for future residential growth.

The Applicant has engaged Insight Economics to complete an economic assessment of the Proposal. The full report is included in **Appendix 10**. The key findings are summarised below.

Future development of the land, and the subsequent construction of new dwellings on it, will create significant one-time boosts in regional and national GDP, jobs, and wages. To summarise: including flow-on effects, over a two- or three-year period, the Proposal is estimated to have the following regional impacts:

- A one-time boost in regional GDP of \$41 million;
- Employment for 440 people-years (e.g. 220 people employed full time for 2 years); and
- Additional household wages and salaries of \$21 million.

The corresponding national economic impacts, which are higher than the regional ones because the national economy captures more of the overall flow-on effects, are:

- A one-time boost in national GDP of \$82 million;
- Employment for 820 people-years (or 410 people employed full-time for 2 years); and
- Additional household wages and salaries of \$40 million.

This additional employment will not only help the district to recover from the devastating effects of Covid-19, but it will also help gradually improve district employment self-sufficiency. This is important, because the district had the second lowest number of jobs per working age resident in 2019, with about 40% of its workers commuting daily to Christchurch City for employment.

Insight Economics also assessed the housing supply consequences of the Proposal and determined that it directly responds to the acute need for more residential land to meet growth in demand over time (refer below for further details).

Insight Economics considers that the Proposal's economic merits are bolstered by the fact that it will be a master-planned development by a willing and able group with a proven track record of delivering quality outcomes in the district.

Insight Economics considered a range of other likely economic effects of the Proposal. They include:

- *Critical Mass and Support for Key Activity Centres (KACs)* – Future residents of the new subdivision will help create critical mass for various local services that may otherwise not be viable. This is important, because the district is currently very reliant on Christchurch City for everyday household goods and services. Overall, it is estimated that future households of the Fast Track homes will spend about \$4.8 million per annum on core retail goods and services.
- *Infrastructure Efficiency* - the subject site is just across the road from a recent growth area and is also within Rangiora's projected infrastructure boundary. As a result, it is likely to achieve high levels of infrastructure efficiency. This, in turn, avoids unnecessary financial risks and costs for the Council while helping to keep the prices of new homes as low as possible.

	- <i>Highest & Best Use of Land</i> - the Proposal will also enable the land to be put to its highest and best use, which is a precondition for economic efficiency to hold in the underlying land market. - <i>Investment Signal Effects</i> - the development will provide a signal of confidence in the district economy, which may help spur on, accelerate, or bring forward other developments. Given the various economic benefits of the Proposal, as summarised above, Insight Economics strongly supports it on economic grounds.
12E	Employment / job creation This matter overlaps with comments above regarding economic benefits, where the Proposal is estimated to create: - in 2022, 12 direct FTE jobs will be created in the planning/design/consent stages, with a further 7 FTE jobs created indirectly in sectors that support planning/design/consent. - in 2023, 37 direct FTE jobs will be created in the earthworks and local infrastructure stages, with a further 53 FTE jobs created indirectly in sectors that support earthworks and local infrastructure. - in 2024, 171 direct FTE jobs will be created in house construction, with a further 315 FTE jobs created indirectly in sectors that support house construction. - in 2025, 9 direct FTE jobs will be created in sectors that support house sales, including marketing agencies, realtors, and conveyancing lawyers. In addition, a further 9 indirect jobs will be created in sectors that support the tasks associated with house sales. Insight Economics, as part of their broader economic assessment, has assessed the employment and job creation consequences of the Proposal. The full report is included at Appendix 10. Key findings regarding employment/ job creation are summarised above.
12F	Housing supply Housing supply contribution The Proposal will result in approximately 209 additional dwellings in the DSP area (at 13.8 households per hectare), which represents a significant contribution to Rangiora's housing supply shortage, and will have important beneficial effects on the local land and housing markets. This Project will result in/enable approximately 40 additional dwellings by 2022, approximately 100 additional dwellings by 2023 and approximately 70 additional dwellings by 2024. Insight Economics, as part of their broader economic assessment, has assessed the housing supply consequences of the Proposal. The full report is included at Appendix 10. Key findings regarding housing supply are summarised below. After identifying the Stage 1 Land's strategic context and expected yields, Insight Economics explored the current state of the local housing market for context. It found that Rangiora locals have different characteristics to the district average, including that they are typically older, less likely to live with a partner, more likely to have recently moved to the district, and more likely to need a smaller dwelling than has previously been provided. Insight Economics also summarised the findings of a recent housing assessment by Livingstone and

Associates, which projected demand for an additional 3,950 dwellings in Rangiora over the next 30 years.

However, despite this strong growth in demand, Insight Economics found that Rangiora has run out of residential land, with only limited scope to provide additional housing within the existing urban area.

The significant and prolonged mismatch between the market supply and demand for residential sections in and around Rangiora has placed upward pressure on land, and thus dwelling, prices. For example, Insight Economics understands that sections in Ravenswood (recent housing development near the fringe of Rangiora) that sold for \$140,000 to \$160,000 prior to the Covid-19 lockdown in 2020 are now selling for between \$180,000 to 220,000 (an increase of about 33% over a 12-month period).

Accordingly, additional land like the Proposal is immediately required to enable dwelling growth to keep pace with demand over time. The Proposal acknowledges and directly responds to the acute need for more residential land to meet growth in demand over time. While the Proposal is not large enough alone to resolve the mounting pressures on land prices, it is a big step in the right direction.

Insight Economics summarised the Proposal's contribution to housing supply as:

- First, it will help restore the supply of local residential land, which is important given the recent profound and prolonged shortage.
- Second, it will help better meet the needs of an evolving population by enabling smaller homes to be built on more compact sections. Indeed, despite ongoing changes in local demography, recent additions to the building stock have mainly been large, three- or four-bedroom homes on sections of at least 600m². These are too big for many households, particularly the smaller and older households that are projected become far more common in future.

Overall, the Proposal will increase development capacity for residential dwellings over the site area currently containing two existing dwellings. The Stage 1 Land could not achieve this yield under the current operative zoning regime. The increased yield of residential lots is clearly a significant public benefit when compared to the limited subdivision and development potential of the Rural zoning, particularly in the context of the directions implicit in the NPS-UD and PPC1 RPS regarding planning for well-functioning urban environments and providing sufficient development capacity to meet the different needs of people and communities.

Development density considerations

The Proposal will deliver a net density of approximately 13.8 households per hectare. This figure is calculated based on the Canterbury Regional Policy Statement definition of "net density", which includes land for residential purposes and roads, but excludes stormwater areas, esplanade reserves and commercial areas.

A density of 13.8 households per hectare is substantially greater than the Canterbury Regional Policy Statement density requirements for greenfield areas in Waimakariri District, which is "at least" 10 household units per hectare (see Objective 6.3.7).

The development density proposed is informed by both market preferences and economic considerations.

A market participant in the local Rangiora real estate industry advises that with mixed-density developments, the large sections are always the first to go. The demand for the smaller sections (e.g. less than 500m²) is driven primarily by price point, not by buyers' ideal preference. It was considered that the proposal provides an appropriate mix of section sizes

for the Rangiora community, who are primarily from farming/rural backgrounds and want larger sections.

Insight Economics confirms that the Proposal will deliver much smaller section sizes than have previously been provided in Rangiora over the previous 10 years. The smaller section sizes, as provided by the Proposal, represents a significant step in the right direction towards higher density development at Rangiora. Insight Economics cautions against adhering too rigidly to a high-density approach as this may result in unintended consequences, such as an unreasonably slow uptake of sections which would affect the viability of the wider Bellgrove development which is dependant on the success of Stage 1. This outcome would curtail some of the economic benefits outlined in the economic assessment provided by Insight Economics.

BRL's intention is to set a high standard of presentation and reasonable mix of section sizes in Stage 1, and considers this can be achieved by the proposed development density. BRL also intends to provide sub-500m² allotments throughout the next stages, which will help support the demand for smaller lots within the market and maintain a higher density throughout the Bellgrove development.

12G Promoting the protection of historic heritage

There are two statutory heritage listings relating to 52 Kippenberger Avenue, which both appear to relate to the historic Bellgrove Homestead (see images at **Appendix 11**). These are:

1. Waimakariri District Plan, Appendix 28.1 – Heritage Site H049:

Site No.	Site Address	Site Name	Legal Description	HPT Register and Category	Criteria for Listing (Policy 9.1.1.1)	District Plan Map No.
H049	52 Kippenberger Avenue	Belgrove	Lot 2 DP 24808, Pt Lot 2 9976 also Pt RS 267	1821 Cat II	A, C, D, E	113

2. Heritage New Zealand List - List Number 1821:

List No.	Site Address	Site Name	List Entry Status	List Entry Type	Former use	Current use	Construction Dates
1821	52 Kippenberger Avenue	Belgrove	Listed	Historic Place Category 2	Accommodation - House	Accommodation - House	Original Construction - 1880

The Proposal recognises the heritage significance of the Bellgrove Homestead and its immediate setting, with this being promoted as an important focal point and identity for the development. It is not clear whether the above heritage listings provide for the protection of the heritage setting surrounding the Homestead (i.e. the immediate garden surrounds) which contains established trees and gardens that contribute to the overall heritage value of the Homestead. Irrespective of whether formal protection is required, the Proposal will retain the Homestead on approximately 2,500m², which will encompass the immediate grounds and established trees extending to the Cam River. The homestead will continue to be used for residential purposes, which is permitted under the WDP. There is no proposal to alter the building or its current use, and as such no resource consent trigger. No consultation has been undertaken with Heritage New Zealand at this point.