

Before the Independent Hearing Commissioner
Appointed by the Christchurch City Council

Under the Resource Management Act 1991

In the matter of Plan Change 18 (Hendersons Residential Rezoning) to the
Christchurch District Plan

Cashmere Fields

Applicant

**Rebuttal Evidence of Bryan John
McGillan**

26 August 2026

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**anderson
lloyd.**

Introduction

- 1 My name is Bryan John McGillan.
- 2 I prepared a planning assessment for Private Plan Change Request 18 (**PC18**) by Cashmere Fields.
- 3 I have provided a Statement of Evidence, dated 14 August 2026. I have the qualifications and experience set out in that evidence.
- 4 I confirm that I have read the Code of Conduct for expert witnesses contained in the Environment Court of New Zealand Practice Note 2023 and that I have complied with it when preparing my evidence.
- 5 This rebuttal evidence responds to the evidence of Isolina O'Brien on behalf of Canterbury Regional Council (**CRC**), dated 21 August 2026. I record that I am broadly in agreement with Ms O'Brien's evidence and this rebuttal focuses on the few points of disagreement.

Highly Productive Land

- 6 In paragraph 33 of Ms O'Brien's evidence, she says there is a distinction between a "significant" addition to development capacity (policy 8, NPS-UD) and "sufficient development" capacity (clause 3.6(1)(a) NPS-HPL); that a significant addition to development capacity does not establish that the rezoning is required to provide sufficient development capacity. I note that in respect of the LUC2 land the Economics Impact Assessment concluded that the urban rezoning of the Site is required to provide sufficient development capacity to meet demand for housing to give effect to the NPS-UD (2020) and that PC18 meets the criteria of clause 3.6 (1) of the NPS-HPL.

Outline Development Plan

- 7 My Statement of Evidence included alternative wording for the Outline Development Plan (**ODP**) text, in response to changes proposed in Ms Parnwell's section 42A Officer's Report.
- 8 Since evidence was filed, there has been further informal discussions between urban design and wastewater experts in an effort to agree on changes to the ODP text. I have also been in contact with Ms Parnwell to confirm her position on the proposed changes. Whilst we are in general agreement, there is a degree of difference in respect of the degree of specificity required in the ODP.
- 9 I consider that some guidance is provided in the Strategic Directions of the Christchurch District Plan (relevantly):

3.3.2 Objective – Clarity of language and efficiency

The District Plan, through its preparation, change, interpretation and implementation:

i. Minimises:

...

B. the number, extent, and prescriptiveness of development controls and design standards in the rules, in order to encourage innovation and choice;

...

ODP text

10 Further changes proposed to the ODP text are shown in blue, see Appendix 1. In summary:

- (a) Urban design – I understand the experts are broadly agreed in respect of the changes to 18.10.18 C (13) residential interface setback; 18.10.18 D 2(d) density variation; and 18.10.18 D 3(e) retention of trees.
- (b) Ecological Management Plan (**EMP**) – I am of the opinion that a suitable EMP can be developed as a condition at the subdivision consenting stage and there is sufficient scope for Council to address this at a more detailed design stage.

In her evidence Ms Drummond recommends that an EMP is required at subdivision consent stage and that it is included as a requirement of the ODP. In response to the submission of Mr. G Trost (submitter #25) and CRC's evidence, Ms Drummond proposes wording for the ODP text requiring an EMP at the time of subdivision, should the Commissioner consider ODP text is required. I note that the Council's ecologist Mr Crossland did not propose an EMP requirement in his evidence.

- (c) Water and wastewater – I consider a number of matters have been addressed by proposed changes to the ODP that would be better addressed at consenting, detailed design and engineering approval stages.

Of particular note is the wording following 18.10.18 D(d) which the Applicant proposes to delete. I consider the level of detail proposed which details the exact number of metres to be upgraded is far too detailed to be included in the ODP wording. All options will be considered at detailed design stage and engineering approval from Council will be required.

ODP plan

11 The ODP plan, see Appendix 2, has been updated to show:

- (a) PC18 area (Area 4c); and
- (b) 4m setback from the residential interface, described in clause 18.10.18 C (13).

Section 32AA Resource Management Act 1991 (RMA)

12 In accordance with Section 32AA of the Resource Management Act, my further evaluation of changes to the ODP since the s32 evaluation was undertaken are summarised in the Table, see Appendix 3.

Dated 26 August 2026

Bryan McGillan

Appendix 1 – Proposed changes to the ODP text

District Plan Text Amendments with Recommended Changes

As a result of the evidence provided by Council's discipline experts and consideration of submissions, some amendments to the District Plan provisions are recommended.

The following lists the proposed ODP narrative in full. Amendments proposed by the Plan Change as notified that are to be deleted are shown as ~~underlined strikethrough text~~. Any text that is recommended to be added, following consideration of submissions, is shown as **bold underlined** text in red, that is to be moved is shown as **underlined text in red** and that is to be deleted as **~~bold strikethrough in red~~**.

While some of the changes to the ODP text recommended in the section 42A report are supported by the Applicant, some of the changes are recommended to be changed or deleted. Those to be deleted are highlighted in yellow, with new wording proposed in green.

Further changes made between evidence exchange and the hearing are marked in blue

8.10.18.A CONTEXT

- a. The Hendersons Basin area was historically a major wetland /raupo swamp. Whilst it has been developed for farming over the last 150 years, it is still significant in terms of its ecological value and function as a natural ponding area. Cashmere Stream, which has historic, ecological and amenity values , traverses the area. The City Council owns land within the basin area and intends increasing the opportunities for wetlands , planting of native species and recreational use. Existing and future stormwater facilities will be a major feature of this neighbourhood. As development will not occur in one contiguous area, establishing connections with adjoining residential areas and integrating development with adjoining open spaces is vital to achieving walkable communities.

8.10.18.B GUIDANCE

- a. Guidance on the means to achieve the development requirements and form and design elements is provided within the Christchurch City Council's New Neighbourhood Design Guide. Further background and guidance is provided in the South West Area Plan, Christchurch City Council, April 2009.

8.10.18.C DEVELOPMENT FORM AND DESIGN

- a. The following design elements and features are relevant considerations in exercising control over the matters in 8.7.1 - 8.7.4 or the matters for discretion in 8.8. They are not requirements for the purposes of Rule 8.6.11(a) or Rule 14.12.2.16.
- 1 The scope for development of the area for residential purposes is limited, as extensive filling for subdivision and building would reduce the storage capacity of the basin and increase the risk of flooding to local and downstream residential

areas. Land development around parts of the basin's periphery is however possible and can be maximised through engineering works, in particular compensatory stormwater storage. Development of areas zoned Rural Urban Fringe is severely constrained due to its location in the flood ponding area.

- 2 Area 1 is to connect with SE Halswell Residential New Neighbourhood Zone, Area 3 will form an extension of the Westmorland neighbourhood, Area 4 will form a link between the Westmorland and Cracroft neighbourhoods, but is to have its own identity.
- 3 New development is to be designed to take maximum advantage of the outlook across Hendersons Basin wetlands and allow visual and physical access to the basin for the wider community. This will be achieved through the provision of view shafts, alignment of roads and footpaths, orientation of allotments and convenient access points for pedestrians and cyclists.
- 4 Cashmere Stream and its enhancement will be a key feature of this area. The Cashmere Drainage system is registered as an historic area under the Historic Places Act 1993 (List number 7482) this includes the drain which runs between Area 4a and 4b. This should be safeguarded and recognised through on-site interpretation.
- 5 Kahikatea stumps are noted in the South West Area Plan (Plan 5). These should be further investigated and addressed as necessary, through the development process.
- 6 An open and attractive interface should be created between the edge of new residential areas and adjacent open land. This may require roads to be located along the boundary with stormwater basin/recreational/conservation or rural land, or if private property boundaries back onto the open area, appropriate boundary planting or fencing is required.
- 7 Where public access along the Hendersons Basin edge is expected, a design solution which addresses privacy and security issues will be required. Consideration is to be given to the view of urban development across the basin from Sparks, Cashmere and Hendersons Roads.
- 8 To provide a less harsh edge to development, a more sinuous alignment of the boundary between the residential development area and adjacent rural zoned land is encouraged, providing there is no increase in the total development area.
- 9 All development is to have a good interface with adjacent roads . In general the subdivision design should encourage houses to front onto roads and the interface treatment should be consistent along the length of the road .

- 10 Where existing properties are to remain, distribution lines cross the residential area or new residential areas adjoin rural or existing residential areas, larger section sizes and planting buffers may be required.
- 11 Higher density development, above 15 hh's/ha, is anticipated in Area 4~~ac~~, particularly ~~at the eastern end and/or~~ adjacent to the stormwater basin.
- 12 There is an opportunity for interpretation boards and structures alongside the Cashmere Stream route to include history of the floodplain, raupo swamp and significance to tangata whenua.
- 13 In Area 4c, where proposed residential land north of Leistrella Road directly adjoins existing northern or eastern residential properties, buildings should be set back at least 4 m from the common boundary to reduce visual bulk of future development.

8.10.18.D DEVELOPMENT REQUIREMENTS

- a. The development requirements for the purposes of Rule 8.6.11(a) and Rule 14.12.2.16 are described below and shown on the accompanying plan.
1. INTEGRATION
 - a. There are multiple land owners within this ODP area and a number of existing properties. Subdivision designs are to demonstrate good connectivity between different land ownership areas through road , open space and pedestrian and cycle way linkages.
 2. DENSITY VARIATIONS
 - a. Area 2 – The land slopes steeply up to Cashmere Road making both access to Cashmere Road and development on the slope difficult. There are also existing properties here. Rule 8.6.11(b) density exemptions apply to this constrained area.
 - b. Area 3 – The developable area will be impacted in Area 3.a by the realignment of Cashmere Stream and the need for compensatory stormwater storage and in 3.b., where there are existing buildings . Rule 8.6.11(b) density exemptions will apply to this constrained area.
 - c. Area 4b – There are existing substantial properties, including those in Boonwood Close. Rule 8.6.11(b) density exemptions apply to this area.
 - d. Area 4c – Areas of higher density should be focused near stormwater management and open-space areas, with lower density at the northern and eastern interfaces, where practicable.

3. OPEN SPACE, RECREATION AND COMMUNITY FACILITIES

- a. Land for recreational/conservation use in conjunction with use for stormwater management.
- b. A community (neighbourhood) park along Sutherlands Road.
- c. The development of parts of a recreational route that connects from Sutherlands Road and runs through to Hendersons Road, running predominantly alongside Cashmere Stream.
- d. A recreational route to provide a link and a viewshaft from Westmorland to the basin area.

~~e. An extension of the existing Kaiwara Street reserve. Should a road connection to Blakiston Street through the existing reserve prove acceptable, including from a parks planning perspective, the loss of the reserve will need to be compensated for through an enlarged reserve on the south side of the new road.~~

~~e. Existing trees within Area 4C are retained, recognising the visual amenity benefits they provide.~~

e. Within Area 4c, and particularly along the frontage with Cashmere Road, development should seek to retain existing quality specimen trees and groupings of these where they can be integrated into subdivision design, do not cause safety or other nuisance effects such as shading issues, and contribute to landscape quality, amenity and character.

4. ACCESS AND TRANSPORT

- a. A secondary road through Area 1 to run from Sutherlands Road from a point immediately opposite the collector road running through South East Halswell RNN to Sparks Road. At least two road links are to be created from Sutherlands Road to the new secondary road .
- b. Road accesses between this RNN area and Sutherlands, Sparks and Cashmere Roads. These are to be safely located in relation to road accesses into S.E. Halswell and North Halswell RNN's, Redmond Spur subdivision and Westmorland.
- c. A road network which provides a connection between Cashmere Road and Hoon Hay but is designed to avoid traffic shortcutting between Westmorland and Hoon Hay. This is likely to be via Leistrella Road. Alternatively a connection from the end of Blakiston Street, may be possible.
- d. The junction with Cashmere Road is to be spaced a safe distance from Penruddock Rise. Alternatively a signalised crossroads with Penruddock Rise may be constructed.

- e. A fully interconnected local road network within Area 1 and Area 4, that achieves a high level of accessibility for people, including opportunities for walking, cycling and public transport.
- f. Pedestrian and cycle connections between residential areas and public spaces.
- g. Where development interfaces with Cashmere Road, provision will be made to enable local road widening to better manage the needs of cyclists in the area.

5. STORMWATER

- a. Land to be set aside for compensatory stormwater storage or other stormwater management as shown on the ODP. Where no such land is shown on an allotment which also has a residential development area, additional land may be required, to be determined at the time of subdivision . Further rural land may be required for stormwater management in the future.
- b. There are known to be springs in the western part of the neighbourhood. These are to be identified and safeguarded at the time of subdivision .
- c. Existing waterways and stormwater drains shown on the ODP are to be enhanced in conjunction with residential development. All watercourses are to have a natural form and may require realignment.
- d. Land set aside for stormwater management is to also incorporate wetland habitats, walkways and cycle ways.

e. Within Area 4c:

- (a) Any proposed earthworks within the existing or future floodplain includes compensatory storage sufficient to:
 - (i) offset the loss of live flood storage.
 - (ii) ensure that the development will not displace flood waters onto adjacent low-lying properties; and
 - (iii) ensure the flood volume of the Hendersons Flood Ponding Management Area is not reduced.
- (b) That a All stormwater management areas and all areas that are required to provide compensatory flood storage vest to the Christchurch City Council as reserves as a measure to protect them from future earthworks or development, and;
- (c) That m Minimum land levels for new development shall be based on:
 - (i) the 1 in 200 year “max of max” flood prediction; and

- (ii) sufficient height to allow finished floors of new dwellings to achieve this peak water level plus 400 millimetres of vertical freeboard.

6. WATER AND WASTEWATER

- a. Most new development in this ODP area can be serviced from the existing water supply network. However a water supply master plan for the Halswell Residential New Neighbourhoods, to be developed by Council , will confirm the infrastructure required. Some additional improvements may be required upon further more detailed investigations being undertaken by Council and/or at the time of subdivision .
- b. Area 1 to be serviced by a pressure sewer area. New residential development will be required to connect to new trunk mains along Sutherlands and Sparks Roads. A pressure sewer along Cashmere Road serving the Redmund Spur subdivision , will be upsized for Area 2. The wastewater servicing of the remaining areas will be determined at the time of subdivision .
- c. No more than 487 houses in East Hendersons shall connect to the pressure sewer system in the Pump Station 68 catchment, unless additional further capacity is available, and suitable infrastructure is deemed available by Council at the time of subdivision.

d. No subdivision or development enabled by PPC18, beyond that already approved within Area 4A, specifically that area shown as Area 4C, shall occur until the necessary water supply network upgrades identified by Council have been designed, funded and delivered by the developer to the satisfaction of Council.

d. The existing water supply network will need to be extended to service Area 4C. It will be the developer's responsibility to deliver the water supply network upgrades identified as being required to service Area 4c.

At a minimum, the required water supply network upgrades include:

- a. Upgrade 307 metres of DN100 AC (installed 1957) water main in Leistrella Road between 26 Leistrella Road and the Hoon Hay Road water main.
- b. Upgrade 499 metres of DN100 CI (installed 1956) water main in Cashmere Road between Leistrella Road and the Hoon Hay Road water main.
- c. Upgrade 218 metres of DN100 AC (installed 1962) water main in Northaw and Rydall Street between 15 Northaw Street and the Sparks Road water main.
- d. Upgrade 256 metres of DN200 CI (installed 1957) water main in Sparks Road between the proposed new connection and the Hoon Hay Road water main.

~~e. Upgrade those sections of the vested DN180 PE100 water main in Leistrella Road that are required to achieve the hydraulic performance standards identified in Council's modelling assessment; and~~

~~f. Any additional works demonstrated through detailed design to be necessary to maintain Council's design standards, levels of service and network resilience.~~

e. Within Area 4c:

- ~~(i) Wastewater servicing shall be designed and managed to ensure that sufficient network capacity is retained to accommodate future development within the balance of Areas 4A and 4B, including provision for 80 additional residential units.~~
- ~~(ii) Any wastewater network augmentation required as a result of development in Area 4c enabled by PPC18 shall be integrated with the existing local pressure sewer network and existing discharge point.~~
- ~~(iii) Development shall not establish additional wastewater discharge points, separate odour treatment facilities, or other standalone wastewater infrastructure unless it can be demonstrated, to the satisfaction of Council, that integration with the existing LPSS network is not practicable.~~
- ~~(iv) Development enabled by PPC18 in Area 4c shall not exceed 333 additional residential units unless further wastewater network upgrades are provided. to the satisfaction of Council. Where future development exceeds the available capacity of the existing local pressure sewer network, any necessary upgrades, including parallel or upsized pressure mains, shall be funded and delivered by the developer. It will be the developer's responsibility to fund the wastewater network upgrades required to service any additional lots.~~

~~NOTE: Development enabled by PPC18 shall not exceed 333 additional residential units unless further wastewater network upgrades are provided to the satisfaction of Council. Where future development exceeds the available capacity of the existing local pressure sewer network, any necessary upgrades, including parallel or upsized pressure mains, shall be funded and delivered by the developer.~~

7. STAGING

- ~~a. There are no staging requirements other than those relating to the provision of infrastructure. Development is however expected to generally proceed from existing roads inwards towards the basin. There are no staging requirements other than those relating to the provision of infrastructure. Development is~~

however expected to generally proceed from existing roads inwards towards the basin.

- b. As it relates to 8.10.18 Hendersons Outline Development Plan (East) In Area 4c, development is expected to be staged-progressed from staged from the Cashmere Road frontage inward, with early development obtaining access from Cashmere Road via Leistrella Road where practicable.

8. Water Bodies and Freshwater Ecosystems

- a. At the time of subdivision in order to protect and enhance fresh water values and ecosystems, subdivision and development within Area 4c shall be in accordance with an Ecological Management Plan prepared by a suitably qualified and experienced practitioner(s).
- b. The Ecological Management Plan shall be maintained as a 'living document' that is updated as the stages of development are progressed and shall, as a minimum, include:
- (i) Restoration and Enhancement Plans for Stilwell Drain (west-east)
 - (ii) Mitigation requirements for construction related works associated with the development of Stilwell Drain (west-east)
 - (iii) Monitoring and maintenance plans for the restored or enhanced feature
 - (iv) Any constructed wetland to require a Management/Mitigation Plan

Appendix 2 – Proposed changes to the ODP plan

KEY

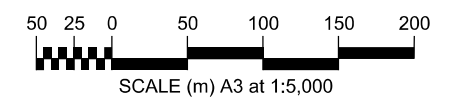
- Outline development plan boundary
- Heritage item to be safeguarded (not scheduled in District Plan)

Development requirements

- Existing waterway or drain to be enhanced in conjunction with urban development. Alignment may vary
- Land to be set aside for stormwater management / recreational / conservation use
- Proposed indicative stormwater management basins subject to detailed design
- Existing road network
- Proposed road network
- Road access point fixed location
- Road access point Location may vary
- Pedestrian / cycle link / route Location may vary
- Recreational route Location and alignment may vary
- Reserve Fixed location Size to be determined at time of subdivision

Residential development area

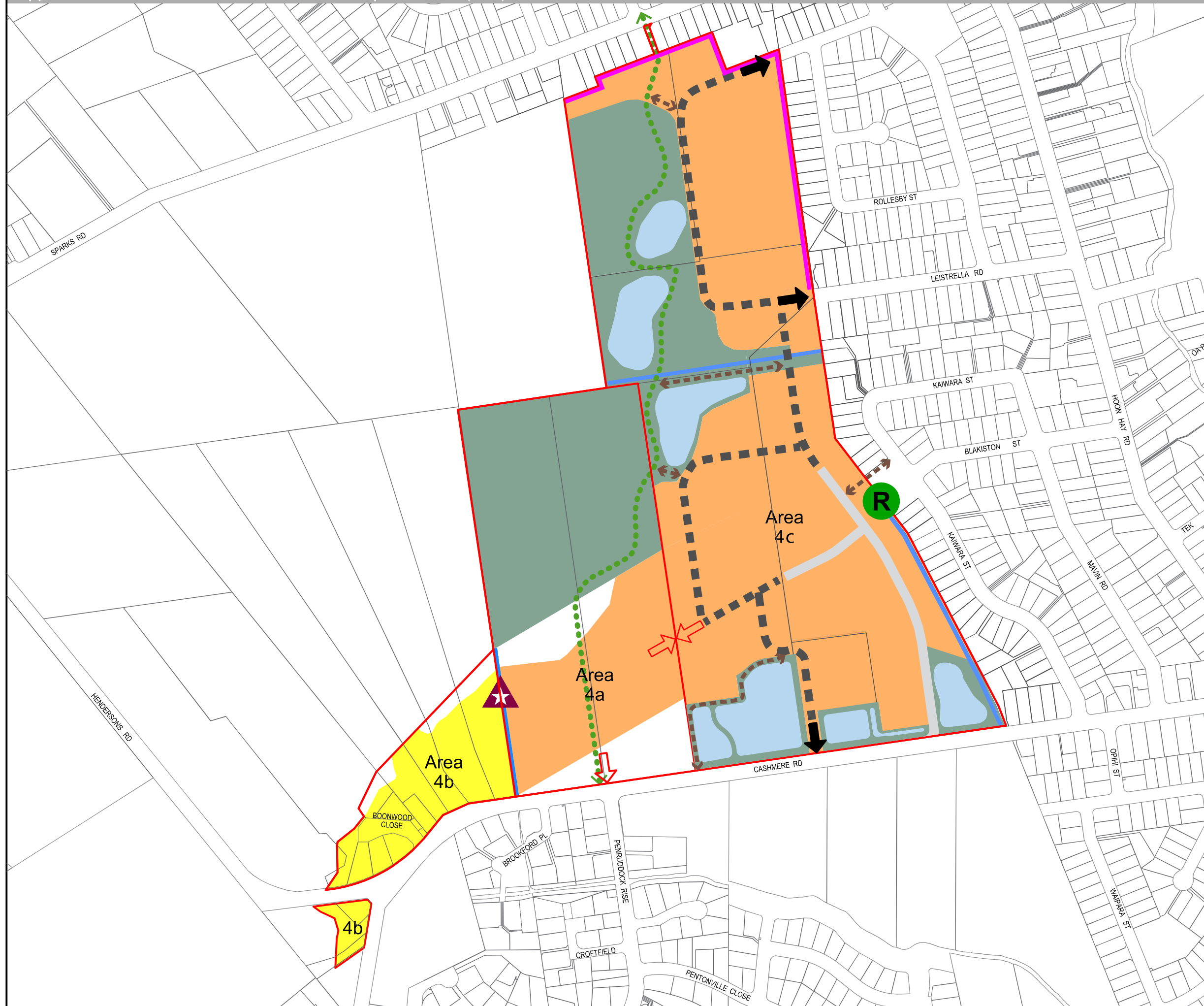
- Residential development area
- Residential development area with greater development constraints
- 4m building setback along northern and eastern boundaries, north of Listrella Road



Technical Services and Design
Assets and Network Unit
Christchurch City Council

Map: pp102303.dgn
Date: 15/05/2017

Appendix 8.10.18 Hendersons Outline Development Plan



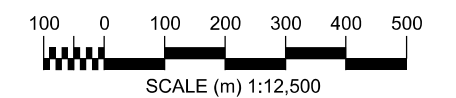
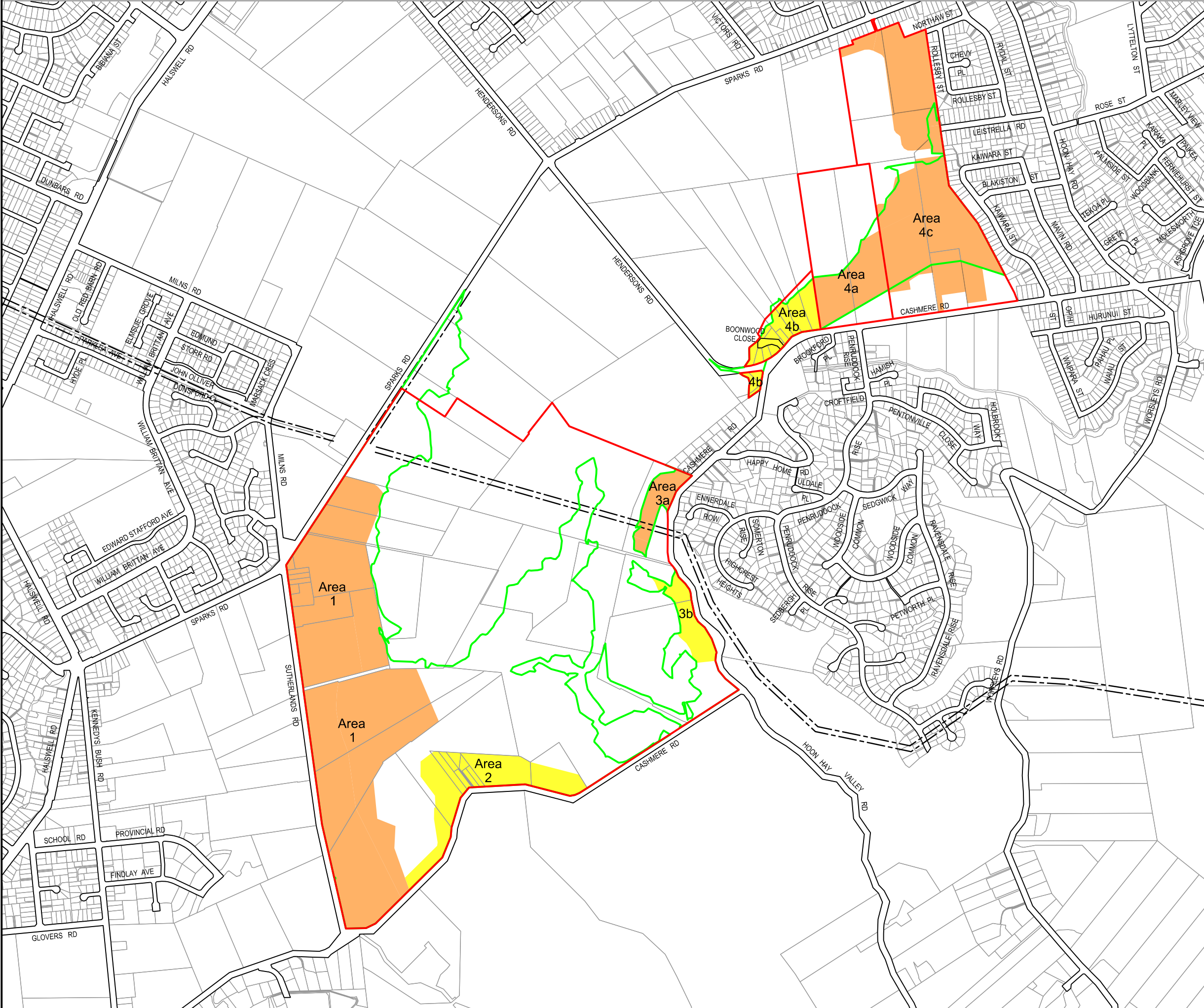


KEY

-  Residential area boundary
 LURP greenfield area boundary
 Existing transmission lines

Residential development area

-  Residential development area
-  Residential development area with greater development constraints
-  Residential development area with severe development constraints



Technical Services and Design
Assets and Network Unit
Christchurch City Council

Map: pp102301.dgn
Date: 22/05/2017

Appendix 8.10.18 Hendersons Outline Development Plan

Appendix 3 – Section 32AA evaluation of ODP changes

26 August 2026

Section 32AA Evaluation

As required by Section 32AA of the Resource Management Act, this report further evaluates changes to District Plan amendments proposed in the notified Plan Change 18 document since the s32 evaluation was undertaken.

In addition this assessment addresses to changes proposed by the reporting officer in the s42A report and subsequent s32AA assessment.

Changes to proposed amendments since the s32 evaluation are assessed in Table 1 below. In evaluating the effects of the changes in accordance with 32AA, the following questions have been considered. Do the changes recommended:

- a. make a significant difference to the conclusions of the s32 evaluation?
- b. have significant effects on their own or in combination with the other amendments?
- c. address the identified problems?

Further evaluation under s32AA shows the changes to the proposed amendments do not affect the conclusions of the s32 evaluation. The proposed provisions are the most appropriate way to achieve the purpose of the RMA.

Changes to PC18 proposed amendments	Effects and Evaluation of Changes
Amendment of the proposed ODP Map: Road connections to reflect the existing roading layout.	The proposed amendment is considered appropriate, effective and efficient as it updates the ODP to accurately reflect the roading infrastructure that is now under construction. The proposed change ensures that the ODP aligns with both the constructed transport network and the approved subdivision pattern, while avoiding potential confusion regarding the location of future road connections.
Amendment of the proposed ODP Map: Insertion of 4m setback north of Leistrella Road	The proposed amendment is considered appropriate, effective and efficient as it updates the ODP to reflect the 4m setback north of Leistrella Road recommended by Mr McFarlane to manage effects on existing residential areas.
Amendment of the proposed ODP Map: New label for Area 4c for broader ODP area	The proposed amendment is considered appropriate, effective and efficient provides clarity as to which particular area the amendments apply to and will aid future interpretation and implementation of the ODP.

Amendment of the proposed ODP text: New Ecological Management Plan clause	The proposed amendment is considered appropriate, effective and efficient as a potential option to support ecological management should the Commissioner consider this is included in the ODP rather than being a matter for subdivision consenting.
Amendment of the proposed ODP text: New 8.10.18.C (13), 4m building setback	The proposed amendment is considered effective and efficient in managing effects of development of the site on existing residential neighbours, while avoiding potential adverse effects associated with an alternative buffer strip along these boundaries (as addressed in the evidence of Jade McFarlane).
Amendment of the proposed ODP text: New clause 8.10.18.D (2)(d), density	The proposed amendment is considered appropriate, effective and efficient as it updates the ODP text to clarify where areas of higher and lower density are best located, having regard to the sensitivity of and amenity provided by adjacent land use.
Amendment of the proposed ODP text: Amended 8.10.18.D (3)(e), retention of trees	The proposed amendment is considered effective and efficient because it seeks to retain existing quality specimen trees and grouping of trees can be integrated into the development, while ensuring that this does not result in unintended and disproportionate effects on the development of the site. The proposed amendment will contribute to landscape quality, amenity and character.
Amendment of the proposed ODP text: Amended 8.10.18.D (5)(e), Stormwater	The proposed amendments are considered both effective and efficient, as they ensure that development is able to appropriately avoid, remedy, or mitigate flooding and stormwater effects. The proposed amendment (reference to Area 4c) clarifies which area this amendment is applicable and is consistent with other proposed changes to ODP text and mapping.
Amendment of the proposed ODP text: Deletion of existing clause and insert new 8.10.18.D (6)(d), Water Supply	The proposed changes are considered effective and efficient as they ensure that development occurs only where adequate water servicing can be provided. The amendment provides clarity and enables

	appropriate consideration of available options as required.
Amendment of the proposed ODP text: Deletion of existing clauses specifying minimum requirements for water supply	The proposed changes are considered effective and efficient as they ensure that upgrades funded by the developer occur only to the extent necessary to support development of the site. It avoids potential limitations by removing a level of specificity that is not appropriate for ODP text.
Amendment of the proposed ODP text: Amended 8.10.18.D (6)(e), wastewater	The proposed changes are considered effective and efficient as they ensure that development occurs only where adequate water and wastewater servicing can be provided. The proposed amendment clarifies which area this amendment is applicable and is consistent with other proposed changes to ODP text and mapping.
Amendment of the proposed ODP text: Deletion of note in wastewater section	The proposed amendment (reference to Area 4c) clarifies which area this amendment is applicable and is consistent with other proposed changes to ODP text and mapping. The proposed deletion is considered appropriate and consistent with other amendments to the ODP text.
Amendment of the proposed ODP text: 8.10.18.D (7)(a), staging	The proposed amendment is considered appropriate, effective and efficient as it provides clarity that there are no staging requirements. Development is however expected to generally proceed from existing roads inwards towards the basin.
Amendment of the proposed ODP text: 8.10.18.D (7)(b), direction of development	The proposed amendment is considered appropriate, effective and efficient as it clarifies the direction in which development is anticipated to proceed. By encouraging development to proceed from the Cashmere Road frontage inward, early development and construction traffic can utilise the higher-order road network, and reduce potential adverse traffic effects on existing residential areas accessed via Hoon Hay Road and Sparks Road.