CHRISTCHURCH DISTRICT PLAN

PRIVATE PLAN CHANGE 23

Whisper Creek Residential Plan Change

PLANNING OFFICER'S REPORT UNDER SECTION 42A OF THE RESOURCE MANAGEMENT ACT 1991

28 April 2026

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LIST OF ABBREVIATIONS

Council	Christchurch City Council
CDP	Operative Christchurch District Plan
CIA	Cultural Impact Assessment
CRLTS	Canterbury Regional Land Transport Strategy 2024-34
CRPS	Canterbury Regional Policy Statement 2013
DC-M	DCM Urban Design Limited
DL-S	Davie Lovell-Smith Limited
ECan	Canterbury Regional Council
FDS	Future Development Strategy
GCSP	Greater Christchurch Spatial Plan 2024
GFA	Gross Floor Area
hh	Households
Hh/ha	Households per hectare
HFMAO	High Flood Hazard Management Area Overlay
ITA	Integrated Transport Assessment
LCSIA	Level Crossing Safety Impact Assessment
LWRP	Canterbury Land and Water Regional Plan 2015
MIMP	Mahaanui Iwi Management Plan 2013
MDRS	Medium Density Residential Standards
MWFT	Murray Wakelin Family Trust
NCZ	Neighbourhood Centre Zone
NES-CS	National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health 2011
NPS-FWM	National Policy Statement for Freshwater Management 2020
NPS-HPL	National Policy Statement for Highly Productive Land 2020
NPS-I	National Policy Statement for Infrastructure 2025
NPS-IB	National Policy Statement for Indigenous Biodiversity 2023
NPS-NH	National Policy Statement for Natural Hazards 2025
NPS UD	National Policy Statement on Urban Development 2020
ŌMS	Ōuruhia Model School (Submitter)
ŌRG	Ōuruhia Residents Group
OWMZ	Open Space Waterway and Margins Zone
Plan/CDP	Christchurch District Plan
PPC23/Plan Change	Private Plan Change 23
Proponent	LMM Investments 2012
RMA/Act	Resource Management Act 1991
RNNZ	Residential New Neighbourhood Zone
RSLR	Relative Sea Level Rise
RuUFZ	Rural Urban Fringe Zone
SPRZ	Special Purpose (Golf Resort) Zone
SRA	Spencerville Residents Association
SLLT	Styx Living Laboratory Trust
SLR	Sea Level Rise
TFBL	True Form Building Ltd (Submitter)
VLM	Vertical Land Movement

1 EXECUTIVE SUMMARY

1.1.1 I have been asked by Christchurch City Council (the **Council**) to prepare this report pursuant to section 42A of the Resource Management Act 1991 (the **Act/RMA**). The report considers the issues raised by submissions on Private Plan Change 23 (the **plan change/PPC23**) to the Christchurch District Plan (the **Plan/CDP**).[1]

1.1.2 This Report forms part of the Council's ongoing reporting obligations to consider the appropriateness of the proposed provisions; the benefits and costs of amendments to any CDP policies, rules or other methods; and the issues raised in submissions on PPC23. The assessments and recommendations included in this Report are intended to assist the Hearing Commissioner, submitters and experts on PPC23. The recommendations contained within this Report are not binding on the Hearing Commissioner, who may reach a different position.

1.1.3 The Section 32 Report that accompanies the plan change provides a detailed description of the site and what CDP provisions are proposed to be changed by LMM Investments 2012 (the **Proponent**).[2] PPC23 as notified and the related process materials, including the requests for further information and the responses, the proponents Section 32 evaluation, submissions and further submissions received and Hearing Commissioner minute(s) are available on Council's website here - PPC23 Whisper Creek Residential Plan Change (https://ccc.govt.nz).

1.1.4 PPC23 relates to land at 144, 156 and 176 Turners Road and 174, 220 and 240 Spencerville Road and 161 Lower Styx Road. The rezoning seeks to enable the residential subdivision and development of the site with associated infrastructure, utility services and facilities. The scope of PPC23 includes:

a. Rezoning the operative Special Purpose Golf Resort Zone (**SPRZ**) and Rural Urban Fringe Zone (**RuUFZ**) portions of the site to a Residential New Neighbourhood Zone (**RNNZ**) with an anticipated yield of 800 households (**hh**).

b. Rezoning a portion of the lower terrace that is currently subject to the SPRZ to RuUFZ to enable rural activities to continue.

c. Applying the Qualifying Matters overlay in response to the infrastructure servicing and flood hazard constraints that will enable the RNNZ minimum housing densities of 15 households per hectare (**hh/ha**) to be applied to any future subdivision.

d. Retaining the current Open Space Waterway and Margins Zone (**OWMZ**) to the balance of the site that includes the lower terrace and Pūharakekenui-Styx River margins.

e. Deleting the Whisper Creek SPRZ references to the site and associated rules and Outline Development Plan (**ODP**) in the Specific Purpose (Golf Resort) Chapter 13.9 and Subdivision Chapter 8 of the CDP.

[1] Christchurch District Plan: Christchurch City Council, As amended on 19 September 2025 by decisions on PC14.

[2] PPC23 Section 32 Report, September 2025.

f. Adding an ODP as an Appendix to Chapter 8 – Subdivision.

g. Including a new activity standard 8.6.11 and permitted activity rule 14.4.3.1.1 to apply the Neighbourhood Centre Zone (**NCZ**) provisions to manage the proposed Neighbourhood Centre.

1.1.5 The standard RMA Schedule 1 process has been followed by the Proponent to promulgate the plan change and the processing of it up to this point.

1.1.6 Seventy-four (74) submissions were received on PPC23. This excludes the submission from G Cockerill (S64), which was formally withdrawn following a written request from the submitter on 26 February 2026. Eight (8) of the submitters' primary relief is to support the rezoning, sixty-one (61) of the submitter's primary relief is to oppose PPC23, and five (5) of the submitters' primary relief is neutral. There are also multiple submission points that seek alternate relief if the rezoning is approved, including in respect to CDP provisions, the ODP, additional design requirements and the need for additional information.

1.1.7 The matters raised in submissions are summarised in Appendix 1 that allocates one of the following topics to each submission point:

a. Due process and technical assessments.

b. Urban form.

c. Housing and business sufficiency and development feasibility.

d. Character, amenity and visual effects.

e. Infrastructure, land development and nuisance effects.

f. Transport.

g. Reverse sensitivity.

h. Human health and natural hazards.

i. Natural, cultural and heritage values.

j. Property and social wellbeing.

1.1.8 The evidence prepared by Council's appointed experts establishes the absence of the following several technical assessments that are critical to substantiating the effects of the rezoning and establishing the appropriateness of PPC23:

a. Housing and business sufficiency and development feasibility - Economic assessment that:
   i. Assesses the economic costs and benefits, including the loss of rural land and other relevant externalities.
   ii. Substantiates the basis for relying on 'greenfield' residential development in Rolleston and Rangiora as the primary alternative options for prospective homeowners.

iii. Substantiates the economic implications of PPC23 on other plan-enabled residential capacity elsewhere in Ōtautahi Christchurch and establishes the economic costs and benefits associated with the rezoning.

iv. Substantiates the plan-enabled residential 'greenfield' capacity in Ōtautahi Christchurch, the extent to which PPC23 contributes to this supply in the short (2028) and medium term (2035) and how the rezoning will contribute to improved housing affordability.

v. Establishes the economic rationale for the 3,000m^2 Gross Floor Area (**GFA**) Neighbourhood Centre and the appropriateness of reducing this to 1,000m^2 GFA.

b. Character, amenity and visual effects - Landscape and Visual Assessment and Urban Design Assessment that:

i. Assesses the visual effects from the likely increase in ground levels associated with the importation of fill to mitigate the natural hazard risk.

ii. Assesses the visual effects associated with the SPRZ permitted baseline to evaluate the level of change arising from the rezoning on the receiving environment.

iii. Considers the appropriateness of the recommended mitigation treatments to integrate the boundary lots with the receiving environment and the development controls for inclusion in the ODP to address the identified adverse visual effects (as referenced in paragraph 5.5.7 and 5.5.13 below).

c. Stormwater management – Infrastructure servicing report that:

i. Establishes the future effects of elevated groundwater, combined with long-term Sea-Level Rise (**SLR**) projections, on the functioning of the proposed stormwater basins and wetlands and how the related effects will be mitigated.

d. Transport safety, efficiency, and accessibility – Integrated Transport Assessment (**ITA**) that:

i. Includes a safety assessment along the Spencerville Road corridor, inclusive of the intersections with Marshland Road and Main North Road to identify any additional mitigation required to offset the increased road safety risks arising from PPC23.

ii. Includes Sidra intersection modelling of the Marshland Road, Main North Road and Spencerville Road intersection to determine if additional upgrades are required.

iii. Establishes the appropriateness of a direct vehicle connection to Lower Styx Road from the PPC23 site.

iv. Assesses whether the proposed interface treatments along the northern property boundary will impede sight distances for vehicles exiting the northern access point, and the need to vest this land as road reserve if required.

v. Includes a multi-modal accessibility assessment for the full PPC23 site consistent with Council ITA guidelines.

e. Natural hazard risks – Infrastructure servicing report and geotechnical assessment that:

   i. Includes supplementary geological engineering modelling that encompasses the slope that separates the upper and lower terraces, and how climate change and SLR may affect the groundwater levels.

   ii. Establishes how the future effects of elevated groundwater and SLR will be managed by the proposed stormwater facilities.

   iii. Provides a flood risk assessment prepared by a suitably qualify and experienced expert that accounts for Vertical Land Movement (**VLM**) and Relative Sea Level Rise (**RSLR**), which have not been modelled by Council and is required to satisfy the NPS-NH risk matrix assessment requirements. This assessment should also identify methods for protecting the stormwater management facilities from groundwater intrusion with consideration of the projected groundwater increases associated with RSLR.

   iv. Provides a tsunami risk assessment prepared by a suitably qualified and experienced expert to establish the related risks and they can be effectively mitigated, which can supplement Council's Tsunami Study completed in 2019.

   v. Includes an NPS-NH risk matrix assessment that is informed by the above assessments.

1.1.9 The Proponent should also provide an updated CDP objectives and policies assessment (PPC23 Section 7 and Appendix J) to determine the extent to which the development that is enabled by the PPC23 ODP is effective and efficient in achieving the outcomes expressed in the CDP Strategic Directions, objectives and policies.

1.1.10 The Proponent is encouraged to address these information gaps in their evidence, which will assist in substantiating PPC23's consistency with RMA Part 2, the relevant National Planning directions, and the objectives and policies of the CDP and Canterbury Regional Policy Statement 2013 (**CRPS**). This supplementary evaluation should also substantiate whether the ODP, in combination with the existing district plan provisions, can effectively manage adverse effects and are the most appropriate methods for delivering the PPC23 objective.

1.1.11 I consider that it will be challenging for the Proponent to provide all these assessments within the evidence exchange timeframes provided under the Act and before the scheduled hearing. Expert caucusing would assist in refining the issues and determining appropriate methods for addressing what are significant issues that are determinative of whether PPC23 should be approved. This is particularly the case for economics, stormwater management, transport, natural hazards (geotechnical and flood risk) urban design, landscape and visual effects and planning to coordinate any further recommended amendments to the PPC23 provisions.

1.1.12 I also recommend several amendments to the PPC23 ODP in Appendix 3 to address the matters raised in submissions and concerns identified in the evidence of Council's appointed experts. The provision of the additional assessments listed in paragraph 1.1.8 is likely to generate further changes to the PPC23 schedule of amendments (Appendix K) once the effects of the rezoning are quantified and the methods for addressing them are determined.

1.1.13 In advance of additional evidence and on the basis of the advice received from Council's experts, I consider that PPC23 as notified does not:

a. Address all adverse environmental effects.

b. Deliver a well-integrated and connected urban environment that is resilient to natural hazard risks.

c. Substantiate the benefits or quantify the costs of the rezoning to the extent necessary to demonstrate that PPC23 is more effective and efficient than the operative SPRZ provisions.

d. Establish that the rezoning will deliver the outcomes expressed in the CRPS and CDP objectives and policies.

e. Achieve the outcomes in the objectives and policies of the NPS-UD, NPS-NH, NPS-I and NPS-FWM.

f. Achieve the purpose and principles of the Act.

1.1.14 Having considered PPC23 as notified, the submissions and further submissions received, and the findings of the Council's experts, I recommend that PPC23 is declined unless the identified information in paragraph 1.1.8 above is provided to the extent necessary to address the concerns raised.

1.1.15 Should the Hearing Commissioner choose to support the rezoning in the absence of the additional assessments listed in paragraph 1.1.8, I recommend that the amendments to the ODP set out in Appendix 3 and evaluated in Appendix 2 are considered.

2 INTRODUCTION

2.1 REPORTING OFFICER

2.1.1 My name is Craig Friedel. I am a Technical Director - Planning at Harrison Grierson, which is a multi-disciplinary engineering consultancy.

2.1.2 I hold a Master of Environmental Policy and Management (Distinction) and a Postgraduate Diploma in Resource Studies (Environmental Policy and Planning) from Lincoln University and a Bachelor of Arts (Geography) from the University of Canterbury.

2.1.3 I have 21 years' experience in planning and resource management in Aotearoa New Zealand, having worked for several local authorities in senior consenting, policy and strategy roles for 13 years and a consultancy for the past eight years. I have been a full member of the New Zealand Planning Institute since 2009 and am an accredited RMA Hearings Commissioner.[3]

2.1.4 I have prepared and presented expert evidence on council and privately initiated plan changes for residential and commercial 'greenfield' projects and rezoning requests across the Greater Christchurch sub-region. I also previously represented Selwyn District Council and contributed to the Greater Christchurch Partnership Officer forum to prepare spatial plans, housing and business development capacity assessments, future development strategies, spatial plans and technical reports to give effect to the National Policy Statement on Urban Development 2020 (the **NPS-UD**) and its predecessor the National Policy Statement on Urban Development Capacity 2016. I am familiar with the CDP provisions, having represented private sector clients through numerous resource consenting processes, including residential 'greenfield' subdivision.

2.1.5 I have been engaged by Council since 14 May 2025 to assist with the processing of PPC23. This has included reviewing the initial plan change request for completeness at lodgement, managing the requests for further information,[4] assisting with the delegated decision-making on how to consider the request,[5] coordinating Council's experts and preparing this Report.[6]

2.1.6 Although this is a Council hearing, I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note and I agree to comply with it.[7] I confirm I have considered all the material facts I am aware of that might alter or detract from the opinions that I express. I confirm this evidence is within my area of expertise, except where I state I am relying on the evidence of another person. I am authorised to give this Report on behalf of the Council.

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[3] Certificate holders - non-local body elected members | Ministry for the Environment - mfe.govt.nz.

[4] Under clause 23 of Schedule 1.

[5] Under clause 25 of Schedule 1.

[6] Pursuant to section 42A.

[7] Environment Court Practice Note 2023 Code of Conduct for Expert Witnesses - https://environmentcourt.govt.nz).

2.2 THE PURPOSE AND SCOPE OF THIS REPORT

2.2.1 This Report has been prepared in accordance with section 42A of the RMA to assist the Hearing Commissioner to consider and make recommendations on the issues raised by the submissions on PPC23 and in the expert evidence prepared by Council's experts.

2.2.2 The purpose of this Report is to:

a. Highlight relevant information and issues regarding PPC23, in terms of the statutory requirements.

b. Consider the issues raised and the relief sought in submissions and further submissions, and make recommendations on whether to accept, except in part, reject or reject in part each submission and further submission point.

2.2.3 My recommendations to accept, accept in part, reject in part or reject the submissions and further submissions received on PPC23 is in Appendix 4. I reserve the right to amend these in response to any further information and evidence that is provided as part of the proceedings.

2.2.4 The scope of this Report includes:

a. An overview of PPC23, including background, summary of the relevant plan changes being sought, procedural steps and summary of the submissions received.

b. Evaluation of the matters raised in submissions and in the expert evidence that culminates in recommendations on whether to accept, accept in part, reject or reject in part the relief sought.

c. Further evaluations under section 32AA that assess the recommended amendments to the PPC23 ODP plan and narrative in response to the submitters' relief and expert evidence (refer to Appendix 2).

d. A consideration of the statutory considerations and instruments as outlined in the Section 32 Report and including the:

   i. Resource Management Act 1991 (**RMA**).[8]

   ii. NPS-UD.[9]

   iii. National Policy Statement for Natural Hazards 2025 (**NPS-NH**).[10]

   iv. National Policy Statement for Infrastructure 2025 (**NPS-I**).[11]

   v. National Policy Statement for Highly Productive Land 2020 (**NPS-HPL**).[12]

[8] Resource Management Act 1991, as updated 17 December 2025 - https://www.legislation.govt.nz/.

[9] National Policy Statement on Urban Development 2020, as updated 11 May 2022 - https://environment.govt.nz/.

[10] National Policy Statement for Natural Hazards 2025 - https://environment.govt.nz/.

[11] National Policy Statement for Infrastructure 2025 - https://environment.govt.nz/.

[12] National Policy Statement for Highly Productive Land Amendment - https://environment.govt.nz/.

vi. National Policy Statement for Indigenous Biodiversity 2023 (**NPS-IB**).[13]

vii. National Policy Statement for Freshwater Management 2020 (**NPS-FWM**).[14]

viii. National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health 2011 (**NES-CS**).[15]

ix. The CRPS.[16]

x. The Canterbury Land and Water Regional Plan 2015 (**LWRP**)[17] and Canterbury Air Regional Plan 2017.[18]

xi. The Greater Christchurch Spatial Plan (**GCSP**[19]) that is the Future Development Strategy (**FDS**) for Ōtautahi Christchurch and portions of the adjoining Selwyn and Waimakariri Districts.

xii. Mahaanui Iwi Management Plan 2013 (**IMP**).[20]

e. An evaluation of PPC23's consistency with the relevant CDP objectives and policies.[21]

f. Consideration of PPC23 in terms of national planning directions, relevant planning instruments and strategies and Part 2 of the Act.

g. Overall, conclusions and recommendations that reflect the need for additional technical assessments and amendments to the ODP to be provided to substantiate the costs and benefits of the rezoning, and ultimately whether PPC23 meets the statutory test.

2.2.5 In addition to considering the Section 32 Report and the submissions and further submissions, I have considered the advice and recommendations of the following experts:

a. Josie Schröder, Urban Designer/ Director, Urban Opera (Consultant for Council) – Urban Design - Appendix 5.

b. Rodney Yeoman, Director at Formative Economics Limited (Consultant for Council) – Economics – Appendix 6.

c. Nicola Smetham, Senior Landscape Architect at Rough Milne Mitchell Landscape Architects (Consultant for Council) – Landscape and visual - Appendix 7.

d. Michele McDonald, Team Leader: Asset Planning - Water and Wastewater (Council) – Wastewater and Water - Appendix 8.

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[13] National Policy Statement for Indigenous Biodiversity 2023, as amended 18 December 2025 - https://environment.govt.nz/.

[14] National Policy Statement for Freshwater Management 2020, as amended 18 December 2025 - https://environment.govt.nz/.

[15] Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 - https://www.legislation.govt.nz/.

[16] Canterbury Regional Policy Statement 2013, as updated in October 2024 – https://www.ecan.govt.nz/.

[17] Canterbury Land and Water Regional Plan 2015, as amended 26 February 2025 - https://www.ecan.govt.nz/.

[18] Canterbury Air Regional Plan 2017 - https://www.ecan.govt.nz/.

[19] Greater Christchurch Spatial Plan 2024 - https://www.greaterchristchurch.org.nz/.

[20] Mahaanui Iwi Management Plan 2013 - https://www.mahaanuikurataiao.co.nz/.

[21] Christchurch District Plan, as amended by decision on Plan Change 14 - https://districtplan.ccc.govt.nz/.

e. Brian Norton, Senior Stormwater Planning Engineer - Stormwater (infrastructure and planning) (Council) – Stormwater – Appendix 9.

f. Peter Barnes, Senior Parks and Policy Planner - Planning and Policy (Council) – Open Space – Appendix 10.

g. David Smith, Technical Director, Transportation Planning at Abley Consultants (Consultant for Council) – Transportation –Appendix 11.

h. Neil Charters, Principal Geotechnical Engineer at ENGEO (Consultant for Council) – Geotechnical - Appendix 12.

i. Dr. Antony Shadbolt, Team Leader Biodiversity - Biodiversity (Council) – Ecology and Biodiversity – Appendix 13.

2.2.6 I have visited the site and am familiar with the wider context of the area, including the Prestons subdivision, Spencerville and Brooklands.

2.2.7 The conclusions and recommendations in this Report are my own and are not binding upon the Hearing Commissioner or the Council in any way. It should not be assumed that the Hearing Commissioner will reach the same conclusions as I have when they have heard and considered all the evidence presented.

3 PRIVATE PLAN CHANGE 23 OVERVIEW

3.1 EXISTING PLAN PROVISIONS

3.1.1 Figure 1 on the following page illustrates that the land that is subject to PPC23 is split across three CDP zones, which is relevant when considering how the existing provisions apply to the evaluation of the rezoning and why the Proponent has sought to rezone the site.

3.1.2 The CDP currently enables the SPRZ portion of the Whisper Creek site to be developed as a golf resort that includes an 18-hole golf course, 380-bedroom hotel serviced apartments, 160-bedroom gold academy, and 150 residential units. The CDP Development Plan establishes that the proposed golf academy, club house, resort facilities and housing are to be established on the higher, northern terrace.[22] The lower terrace can be utilised for the golf course and driving range facilities, along with stormwater management, open space and active networks. There is no built form requirement within the OWMZ along the Pūharakekenui-Styx River margin.

3.1.3 Chapter 13.9 of the CDP includes the SPRZ provisions that apply to the existing Clearwater Golf Resort and the proposed Whisper Creek Golf Resort only. The SPRZ objectives and policies, and the Whisper Creek specific rules (rules 13.9.5), built form standards (13.9.5.2 and 13.9.5.3), matters of discretion (13.9.6) and Development Plan (Appendix 13.9.7.2) enable golfing and

[22] Chapter 13 Specific Purpose Zones, 13.9 Specific Purpose (Golf Resort) Zone, 13.9.7 Appendices – https://ccc.govt.nz.

associated facilities, complementary recreation activities and some limited residential development.

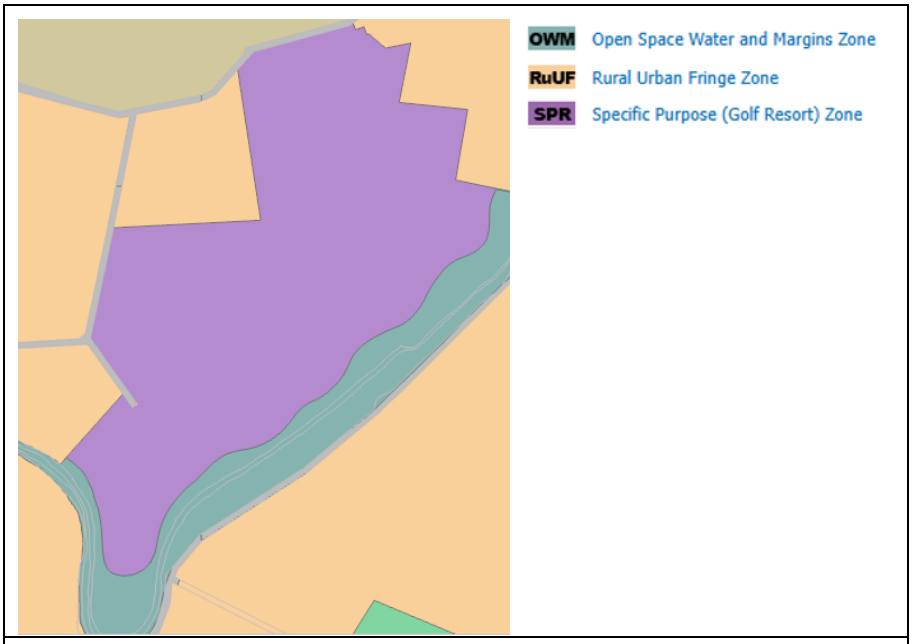


Figure 1 – CDP Planning Maps.[23]

3.1.4 There are four properties in the north-western corner of the site that are subject to the RuUFZ that are in separate ownership. The SPRZ applies to the upper and lower terraces and the OWMZ applies to the Pūharakekenui-Styx River riparian margin. PPC23 proposes to rezone the existing RuUFZ to RNNZ, the upper terrace portion of the SPRZ to RNNZ and the lower terrace balance to RuUFZ to preclude residential development but enable rural activities, ecological restoration and other related activities.

3.1.5 The PPC23 Section 32 Report notes that the site remains rural in appearance and development of the Whisper Creek Golf Resort hasn't proceeded. This is despite the CDP having contained the SPRZ Whisper Creek provisions for fifteen years.[24] For completeness, the landowners made an application to develop the Whisper Creek Golf Resort for residential purposes under the COVID 19 Recovery (Fast-track Consenting) Act 2020, which was unsuccessful in being referred.[25]

3.1.6 Chapter 6 of the CRPS is relevant for considering the appropriateness of PPC23 as it contains the higher order directions on the urban form of the Greater Christchurch sub-region, as well as the housing bottom lines, pre-requisites for residential 'greenfield' development, natural hazard risks, and the directions for the integrated and coordinated management of infrastructure and transport.

3.1.7 The PPC23 Section 32 Report records that Map A does not record several SPRZ as *"urban"* environments, including both the Whisper Creek and Clearwater SPRZ and facilities such as

[23] CDP Planning Maps, 29 January 2026 - https://ccc.govt.nz/.

[24] PPC23 Section 32 Report 2 The Site and the Surrounding Environment, pg. 4 - https://ccc.govt.nz/.

[25] PPC23 Section 32 Report 3.8 Consultation, pg. 15 - https://ccc.govt.nz/.

Christchurch and Rolleston Prisons and Burnham Military Camp.[26] The proponent indicates that while neither of the golf resorts are shown on Map A, the CRPS definition of an *"urban activity"* includes residential activities at densities of more than 1hh/4ha, business activities, and sports fields and recreation facilities that service an urban population.[27] The proponent considers that the SPRZ, and the housing densities and small-scale commercial activities enabled by it, are *"urban"* activities for the purposes of applying the CRPS policy framework. Therefore, PPC23 is seeking to intensify an existing urban area, albeit from a golf resort to a 'greenfield' residential subdivision and development.

3.1.8 In contrast, the four properties that are subject to the RuUFZ are *"rural"* activities where the proposed RNNZ constitutes a new 'greenfield' growth area that is *"unplanned and out of sequence development"* in the context of the CDP, CRPS Chapter 6 Map A and the NPS-UD. The PPC23 Section 32 Report confirms that no changes are sought to the OWMZ that separates the SPRZ from the Pūharakekenui-Styx River margin.

3.1.9 In summary, the Proponent has prepared PPC23 on the basis that the Whisper Creek Golf Resort is no longer considered viable and that a more intensive residential subdivision and housing development is enabled by the CDP and CRPS Chapter 6 by virtue of the existing SPRZ enabling *"urban"* activities to be established on the site. The various technical reports and assessments prepared by the Proponent as a component part of PPC23 also support the rezoning as a more appropriate use of the land than the current SPRZ and RuUFZ.

3.1.10 PPC23 was promulgated by the Proponent within the above planning context, considering a range of specialist reports and advice. The key considerations relevant to the consideration of the plan change and the submissions received, including the actual and potential effects of the proposal, and the proposed mitigation measures, have been evaluated in the Section 32 Report and technical assessments accompanying PPC23. These matters will be discussed in more detail in Section 5 of this Report.

3.2 BACKGROUND TO THE PLAN CHANGE

Site and rezoning context

3.2.1 I adopt the Proponents' description of the site and its surrounding environments for the purposes of establishing the site context.[28] The land is privately owned by seven different entities. The PPC23 Section 32 Report identifies that the Proponent either owns, or is a prospective purchaser of, the land holdings within the existing SPRZ.

[26] PPC23 Section 32 Report 6.5 Canterbury Regional Policy Statement (CRPS), pg. 18 - https://ccc.govt.nz/.

[27] CRPS, Definitions for Greater Christchurch, pg. 252 – http://ecan.govt.nz.

[28] PPC23 Section 32 Report 2. The Site and Surrounding Environment, pg. 8 and 7.1 Appropriateness of Objectives and Policies of the CDP, pg.41 - https://ccc.govt.nz/.

3.3 SUMMARY OF THE PLAN CHANGE

3.3.1 The stated objective of PPC23 is:[29]

> *"… to enable the development of a new residential community with an associated local community / commercial centre, set within extensive open space areas and ecological restoration, and well connected to the existing urban area and local schools. The plan change will make a significant contribution to housing capacity and provide for increased competition and choice in residential land markets, whilst managing adverse effects of the change in land use on the surrounding area. Provision for a variety of densities (including medium density and lower density development) within the Plan Change area is considered appropriate to provide housing choice, help address declining housing affordability, and enable persons and the community to provide for their health and wellbeing, while avoiding, remedying or mitigating potential adverse effects."*

3.3.2 PPC23 seeks to retain the full extent of the existing OWMZ but to rezone the western balance of the site to RNNZ to facilitate the development of 800 residential sections at average densities of 15hh/ha with a NCZ to accommodate a 3,000m^2 GFA Neighbourhood Centre to provide local services and convenience retail. A new area-specific rule (rule 14.4.4.3.1.1 P4) is proposed to set the pre-requisites for developing and operating this Neighbourhood Centre.



Figure 2 – Qualifying matters sought through PPC23.[30]

3.3.3 An RuUFZ is being sought for the lower terraced portion of the site in response to the High Flood Hazard Management Area Overlay (**HFMAO**) that is to remain in place.

3.3.4 Qualifying matters are also sought to retain the RNNZ minimum densities to recognise the site-specific infrastructure servicing and flood constraints that limit the application of the Medium Density Residential Standards (**MDRS**) (refer to Figure 2).

[29] PPC23 Section 32 Report 3.3. Purpose and Reasons for the Plan Change, pg. 11 - https://ccc.govt.nz/.

[30] PPC23 Section 32 Report PPC23 Appendix F Landscape Graphics CDP Qualifying Matters - https://ccc.govt.nz/.

3.3.5 PPC23 proposes changes to the CDP to remove the SPRZ Whisper Creek ODP and inserting a new ODP to utilise the settled RNNZ and NCZ provisions (and relevant CDP provisions) to guide the subdivision and development of the site.

3.3.6 Methods are proposed to service the site with reticulated water and wastewater supplies and stormwater networks to accommodate the additional demand from the increased housing densities and type of residential development. The riparian ecology in the OWMZ is proposed to be restored and enhanced to support greater access to the Pūharakekenui-Styx River margins.

3.3.7 As the Proponent has emphasised in the PPC23 Section 32 Report, no changes are proposed to the operative RNNZ policy or rule frameworks beyond the introduction of a new ODP and associated narrative and single rule and activity standard to enable a Neighbourhood Centre to be developed and operated in accordance with the NCZ provisions.[31]

3.3.8 In reviewing PPC23, the submissions and evidence received from Councils appointed experts, I consider that it is necessary for the proponent to supplement the schedule of amendments (in Appendix K of PPC23) with additional changes to the proposed ODP. These recommended changes are to ensure consistency with the statutory requirements and confirm that the RNNZ framework can be applied to the site to effectively manage the effects of the future activities and buildings enabled by the rezoning within this locational context. These changes are evaluated in Sections 5 to 7 and detailed in Section 8 and Appendix 3 of this report.

3.4 PROCEDURAL STEPS

3.4.1 The Proponent was in regular contact with Council staff and that informed the plan change request. LMM Investments 2012 lodged PPC23 with the Council on 17 May 2025.

3.4.2 An initial further information request[32] issued on 11 June 2025 was responded to be the Proponent on 7 July 2025. This response contained a cover letter,[33] a technical memo prepared by Insight Economics[34] and stormwater memo prepared by Davie Lovell-Smith.[35] A second request for further information request[36] issued on 6 August 2025 was responded to be the Proponent on 28 August 2025. This second response contained a cover letter[37] and included a letter from Chapman Tripp on the application of the MDRS[38] (Appendix N of the notified request), an updated set of graphics that included an amended ODP and updated changes to the CDP Planning Maps prepared by DCM Urban Design Ltd.[39]

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[31] PPC23 Section 32 Report 3. The Plan Change, pg. 10 - https://ccc.govt.nz/.

[32] PPC23 Whisper Creek CCC 1st RFI - https://ccc.govt.nz.

[33] PPC23 1st RFI Response - - https://ccc.govt.nz.

[34] PPC23 1st RFI Response Economics - https://ccc.govt.nz.

[35] PPC23 1st RFI Response Stormwater - https://ccc.govt.nz.

[36] PPC23 Whisper Creek CCC 2nd RFI - https://ccc.govt.nz.

[37] PPC23 2nd RFI Response - https://ccc.govt.nz.

[38] PPC23 Appendix N Application of MDRS, Chapman Tripp, 29 July 2026 - https://ccc.govt.nz.

[39] PPC23 2nd RFI Response Appendix 2 Graphic-Attachment - https://ccc.govt.nz.

3.4.3 The Proponent incorporated the changes arising from the request for further information responses into an amended PPC23 dated 5 September 2025 that was notified and supersedes the original dated May 2025.

3.4.4 PPC23 was accepted for notification pursuant to clause 25 of Schedule 1 under a delegated decision by Council's General Manager – Strategy, Planning and Regulatory on 23 September 2025, noting that this initial step does not indicate that the Council supports the plan change request in full or in part.

3.4.5 PPC23 was publicly notified on 17 October 2025.[40] Submissions closed on 17 November 2025. The summary of submissions and notification of the opportunity to lodge further submissions was publicly notified on 9 January 2026.[41] Further submissions closed on 23 January 2026. There were no submissions or further submissions received after the notified close of submission dates.

3.4.6 PPC23 has reached the point where a hearing is now required (Clause 8B of Schedule 1) to enable the Hearing Commissioner to make a recommendation to the Council on whether to approve or decline the plan change request and the associated submissions (Clause 10 of Schedule 1).

3.4.7 The only procedural matter that I consider needs to be highlighted to the Hearing Commissioner and other parties relates to the schedule of amendments in Attachment K of PPC23. The Proponent submitted an updated Attachment K on 5 September 2025 at the conclusion of the request for further information process. This version included amendments to the ODP map and narrative following a review that was undertaken by Council on a non-prejudiced basis. It replaced the original version dated 5 May 2025 to correspond with the amended PPC23 AEE, Section 32 analysis and updated assessments.

3.4.8 The updated version of Appendix K dated 5 September 2025 was included in the notified version of PPC23 that was available on Council's *"Let's Talk"* webpage that was linked to the public notice.[42] However, the original Appendix K version was incorrectly published on a separate PPC23 webpage for a period of time before it was updated.[43] This means that there were two different versions of Appendix K available on Council's website between 17 October 2025 and 1 April 2026.

3.4.9 The following differences between the two versions are relatively significant:

a. The inclusion of new activity standard 8.6.11 and permitted activity 14.4.3.1.1 to apply the NCZ provisions to manage the proposed Neighbourhood Centre.

b. The number of Neighbourhood Parks has reduced from five to three following advice from Council's Parks and Reserves Team as part of the request for further information process.

[40] PPC23 Public Notice - https://ccc.govt.nz/.

[41] PPC23 Further submissions public notice - https://ccc.govt.nz/.

[42] PPC23 Kōrero mai - Let's talk, dated 5 September 2025, CCC consultation webpage - https://ccc.govt.nz.

[43] PC23-APPENDIX-K-Plan-Change, dated 5 May 2025, CCC PPC23 webpage - https://ccc.govt.nz.

c. Amended ODP narrative, including additional items under 8.10.31.c Development and Urban Form and 8.10.31.D Development Requirements (2. Open Space, Recreation and Community Facilities and inclusion of 7. Natural Hazards).

d. Amended zoning map to replace the RNNZ initially proposed for the lower terrace to RuUFZ.

e. A legend included in the Qualifying Matters map.

f. Formatting changes to align to maintain consistency with Council 's CDP drafting conventions.

3.4.10 I do not consider that the presence of two different versions of Appendix K presents any prejudice to the Proponent, the submitters or any person's ability to lodge a submission because:

a. The latest version has been available on the *"Let's Talk"* webpage throughout the submissions phase of the process and was directly linked to the public notice.

b. The changes included in the 5 September version are also consistent with the updated Section 32 Report and ODP plan in Appendix F (i) Landscape graphics dated 28 August 2025 contained in the Proponent's response to the second request for further information.[44]

c. All the Council experts have based their evidence on the latest version of Appendix K dated 5 September 2025.

d. There has been no indication from submitters or other interested parties that there was an inconsistency between the two published versions of Appendix K.

3.5 SUBMISSIONS

3.5.1 A total of 74 submissions were received on PPC23. The submissions are summarised in Table 1 below and recorded in Appendix 1. The matters raised by submitters are considered in Sections 5 and 6 of this Report.

3.5.2 A summary of submissions is available on Council's website that was prepared by Council and informed the notification of submissions, which was updated on 4 March 2026 to record the withdrawal of the submission from G Cockerill (S64).[45]

Table 1: PPC23 Submissions Received

Submitter		Relief sought	Submitter		Relief sought
S01	J Dutkiewicz	Oppose	**S38**	N Duxbury	Oppose
S02	S Blackler	Oppose	**S39**	A Te Ohaere-Fox	Oppose
S03	I Blackler	Oppose	**S40**	A Neate	Support
S04	R Watson	Oppose	**S41**	M Gilmore	Oppose
S05	C Shaw	Neutral	**S42**	J Knight	Oppose

[44] PPC23 2nd RFI Response Appendix 2 Graphic-Attachment - https://ccc.govt.nz.

[45] PPC23 Summary of submissions, updated 4 March 2026 - https://ccc.govt.nz/.

Table 1: PPC23 Submissions Received					
S06	S & K Baker	Oppose	**S43**	K Bowden	Oppose
S07	D & K Casey	Support	**S44**	V Knowles	Oppose
S08	True Form Building Ltd (**TFBL**)	Support	**S45**	D Knight	Oppose
S09	M Pierce	Oppose	**S46**	A Hicks	Neutral
S10	D Miller	Oppose	**S47**	J Burney	Oppose
S11	K Foot	Oppose	**S48**	B Uren	Oppose
S12	A Greaves	Support	**S49**	N Hough	Oppose
S13	J Kennedy	Oppose	**S50**	D McGarvey	Oppose
S14	Spencerville Residents Association (**SRA**)	Oppose	**S51**	G Lowe	Oppose
S15	K Van de Loo	Oppose	**S52**	Gramco Ltd	Support
S16	C Howison	Oppose	**S53**	R & K Winter	Oppose
S17	T Wilson	Oppose	**S54**	J Lowe	Oppose
S18	Z Duan	Neutral	**S55**	Murray Wakelin Family Trust (**MWFT**)	Oppose
S19	M van Valkenburg	Oppose	**S56**	A Scott	Oppose
S20	D Riwaka	Oppose	**S57**	J Hawkins	Oppose
S21	C Mitchell	Oppose	**S58**	D Tipple	Support
S22	D Elkington	Oppose	**S59**	Ōuruhia Model School (**ŌMS**)	Support
S23	R Howison	Oppose	**S60**	Rolling Meadows	Oppose
S24	D Lowe	Oppose	**S61**	P McGuigan	Oppose
S25	Styx Living Laboratory Trust (**SLLT**)	Support	**S62**	A McKenzie	Oppose
S26	C Wakelin	Oppose	**S63**	J Burns	Oppose
S27	A Smirnoff	Oppose	**S64**	Withdrawn	Withdrawn
S28	D Parker	Oppose	**S65**	C Faithfull	Oppose
S29	M Stewart	Oppose	**S66**	D English	Oppose
S30	L Bennett	Oppose	**S67**	D Gilmore	Oppose
S31	Angela	Oppose	**S68**	L Maurice	Oppose
S32	C Elkington	Oppose	**S69**	Canterbury Regional Council (**ECan**)	Neutral

Table 1: PPC23 Submissions Received					
S33	K & L Wells	Neutral	**S70**	Ōuruhia Residents Group (**ŌRG**)	Oppose
S34	D Ling	Oppose	**S71**	K & A Buxton	Oppose
S35	R Ennor	Oppose	**S72**	P Hargreaves	Oppose
S36	H King	Oppose	**S73**	M Wells	Oppose
S37	M Skelly	Oppose	**S74**	J Messerly	Oppose
S38	N Duxbury	Oppose			

3.5.3 As recorded in Table 2 below, there were three further submissions received on PPC23.

Table 2: Further Submissions Received		
Submitter		Relief sought
FS01	Tammy Wells	**Support** - S4 R Watson, S31 Angela, S34 D Ling, S42 J Knight, S45 D Knight, S70 ŌRG and S75 J Messerly
FS02	G & H Nimmo	**Support** – S23 R Howson, S75 J Messerly **Oppose** – S58 D Tipple
FS03	B Muschamp	**Support** – S70 ŌRG

3.5.4 The nature and scope of the submissions do not give rise to trade competition[46] and there are no jurisdictional scope issues that I consider need to be raised with the Hearing Commissioner. There were no late submissions received after the notified closing dates.

4 STATUTORY CONSIDERATIONS

4.1 THE RESOURCE MANAGEMENT ACT 1991

4.1.1 Section 73 (2) of the RMA allows for any person to request that a change be made to a district plan, in accordance with the process set out in Part 2 or Part 5 of Schedule 1.[47] Clause 21 (1) of Schedule 1 permits any person to make a request to change a district plan, and Council's must publicly notify a plan change unless it falls within the limited grounds set out in Clause 25 (4) and is rejected in whole or in part. Part 5 of Schedule 1 is not relevant to this request as it relates to the use of the *"streamlined planning process,"* which is not proposed in this instance.

4.1.2 Clause 22 of Part 2 of Schedule 1 requires that the plan change request:

a. Explain the purpose of, and reasons for, the proposed change and contain an evaluation report prepared in accordance with section 32 of the RMA.

[46] Pursuant to section 308A of the Act.

[47] Resource Management Act 1991, 17 March 2026 - https://www.legislation.govt.nz/act/public/1991.

b. Where environmental effects are anticipated, describe those effects in such detail as corresponds with the scale and significance of the actual or potential environmental effects anticipated from the implementation of the change.

4.1.3 In this case, the tests to be applied to the consideration of PPC23 under Part 2 of Schedule 1 are summarised below and include whether the CDP will continue to:

a. *"Accord with"* and assist the Council to carry out its functions to prepare, implement and review its district plan (section 74 (1)(a) and section 31).

b. *"Accord with"* the RMA Part 2 Purpose and Principles (section 74 (1)(b)).

c. *"Accord with"* relevant national policy statements, the New Zealand Coastal Policy Statement, the national planning standards and regulations (section 74 (1) (ea) and (f)).

d. "G*ive effect"* to any national policy statement, national planning standard or operative regional policy statement (section 75 (3)) or be inconsistent with a water conservation order or regional plan (section 75 (4)).

e. Examine the extent to which the objectives (in this case, being the PPC23 purpose of that is quoted in paragraph 3.3.1 above) is the "*most appropriate way"* to achieve the RMA Purpose (section 32 (1)(a)).

f. Examine whether the provisions are the *"most appropriate way"* to achieve the objectives of the CDP and the PPC23 purpose (section 32 (1)(b)).

4.1.4 In evaluating the appropriateness of PPC23, Council must also:

a. *"Have particular regard"* to an evaluation report prepared in accordance with section 32 (section 74 (1) (e)).

b. *"Have regard to"* any proposed regional policy statement, and management plans and strategies prepared under any other Acts and consistency with the plans or proposed plans of adjacent territorial authorities (section 74 (2)).

c. *"Take into account"* any relevant planning document recognised by an iwi authority (section 74 (2A)).

d. *"Not have regard"* to trade competition or the effects of trade competition (section 74 (3)).

e. Ensure the rezoning is *"not be inconsistent"* with any relevant water conservation orders or regional plans (section 75 (4)).

f. *"Have regard to"* actual and potential effects on the environment, including any adverse effect in respect to making a rule (section 76 (3)).

4.1.5 The functions of councils set out in section 31 of the Act that are required to be maintained when evaluating the appropriateness of PPC23 include the establishment, implementation and review of objectives, policies, and methods to:

a. Achieve integrated management of the effects of the use, development and protection of land and associated natural and physical resources (section 31 (1) (a)).

b. Ensure that there is sufficient development capacity in respect of housing and business land to meet the expected demands of the district, including by establishing, implementing and reviewing relevant CDP objectives, policies and methods (section 31 (1) (aa)).

c. Control any actual or potential effects of the use, development, or protection of land that includes avoiding and mitigating natural hazards and contaminated land and maintaining indigenous biological diversity (section 31 (1)(b)), managing noise emissions and mitigating any related effects (section 31 (1)(d)) and any other functions under the Act (section 31 (1)(f)).

4.1.6 I have assessed the matters raised in submissions and the actual and potential effects of PPC23 on the environment in Section 5 of this Report. The extent to which PPC23 is consistent with the higher order planning instruments and Purpose and Principles of the Act are assessed in Section 6 of this Report.

5 ANALYSIS OF PPC23 AND EVALUATION OF SUBMISSIONS

5.1 OVERVIEW

5.1.1 This section includes a summary of the material included within PPC23, details the submission points received, and outlines the expert evidence to inform the overall recommendations of this Report. These are then evaluated and recommendations made on whether the relief sought in the submissions should be accepted or rejected, in whole or in part.

5.1.2 For ease of reference, all submission points considered under a particular topic are referenced as footnotes. My recommendations on each submission point are recorded generally at the conclusion of each of the topic-based evaluations with reference to the consolidated summary of reasons in Appendix 4. Section 32AA evaluations are provided in Appendix 2 where additional changes are recommended to address the matters raised in the submissions and expert evidence to maintain consistency with the relevant planning instruments and RMA tests.

5.1.3 Having considered the submissions and the evidence from Council's experts, I recommend several amendments to the publicly notified version of the PPC23 ODP that are recorded in Appendix 3.

5.1.4 I consider that the key matters that have either been raised by submitters, identified in the expert evidence, or need to be considered to ensure that the Council's statutory functions and responsibilities are achieved, include the following topics that are evaluated in the next sections of this Report:

a. Due process and technical assessments.

b. Urban form.

c. Housing and business sufficiency and development feasibility.

d. Character, amenity and visual effects.

e. Infrastructure and land development effects, including 3Waters, utilities, Neighbourhood Parks, earthworks and nuisance effects and community facilities.

f. Transport network safety, efficiency and accessibility.

g. Human health and natural hazard risks.

h. Reverse sensitivity.

i. Natural, cultural and historic sites and values.

j. Property and social wellbeing.

5.2 DUE PROCESS AND TECHNICAL ASSESSMENTS

5.2.1 It is critical that due process is followed when administering private plan change requests and considering the appropriateness of any rezoning. This is to ensure that the natural justice rights of all the parties to the proceeding, including the Proponent and submitters, have been upheld to ensure a fair and transparent process.

Submissions received – Due process and technical assessments

5.2.2 Fourteen (14) submission points cover due process, which in summary:

a. Support PPC23 but does not consider the Spencerville Residents' Association (SRA) to be representative of the local community.[48]

b. Oppose PPC23 because there has been limited consultation with the community, landowners and iwi of the rezoning.[49]

c. Oppose PPC23 because there are inadequate assessments provided to evaluate the rezoning that needs to be addressed through technical reports, assessments and peer reviews.[50]

Analysis – Due process and technical assessments

5.2.3 In respect to the legitimacy of the SRA submission, the RMA enables any person to submit on a private plan change request if that person does not gain an advantage in trade competition

[48] S12.1 A Greaves.

[49] S14.1 SRA, S19.1 M van Valkenburg, S20.1 D Riwaka, S22.1 D Elkington, S23.1 R Howison *(FS02 H & G Nimmo – Support)*, S45.1 D Knight *(FS01 T Wells – Support)*, S54.1 J Lowe, S63.1 J Burns, S70.1 ŌRG *(FS01 T Wells & FS03 R Muschamp - Support)* and S75.12 J Messerly (*FS01 T Wells & FS02 H & G Nimmo – Support*).

[50] S22.1 D Elkington, S32.1 C Elkington and S75.11 & S75.12 J Messerly (*FS01 T Wells & FS02 H & G Nimmo – Support*).

(Schedule 1 clause 6 (3)). The RMA definition of a *"person"* includes *"…a body of persons…"* that encompasses representative organisations.[51]

5.2.4 There is no statutory obligation under the RMA that requires a private plan change proponent to consult with landowners or mana whenua (Schedule 1 clauses 3 and 3A to 3C). Consequently, I recommend that the associated submissions are rejected.

5.2.5 I assess the adequacy of the assessments provided by the Proponent to support PPC23 in the following sub-sections of this Report, while noting the list of additional assessments that are required in paragraph 1.1.8. Consequently, I recommend that the submissions that request the assessments that are identified as being outstanding in this Report are accepted. There are also circumstances where the submitters have sought a range of technical assessments that I do not consider are necessary for the purpose of evaluating the appropriateness of the rezoning. This is because they either do not relate to processes that are directly administered under the RMA or the related planning instruments or have not been identified as necessary by Council's experts. Consequently, I recommend that these submissions are rejected.

Recommendations – Due process and technical assessments

5.2.6 On the basis of the above evaluations and as recorded in Appendix 4, I recommend that the submissions on due process are accepted or rejected.

5.3 URBAN FORM

5.3.1 The following analysis evaluates whether the rezoning of the site constitutes an appropriate urban form in the context of how urban environments are strategically managed across the Greater Christchurch sub-region. This is a multi-faceted analysis that extends across several of the topics that are evaluated in this section and the statutory analysis in Section 6 of this Report.

PPC23 – Urban form

5.3.2 The Proponent's rationale for the PPC23 urban form and its consistency with the related national and sub-regional planning instruments and CDP Strategic Directions are recorded in the Section 32 evaluation.[52] Importantly, the Proponent identifies that the SPRZ portion of the site qualifies as an *"urban environment"* in the context of the NPS-UD (Policy 8). This is by virtue of the site being subject to a SPRZ that is more *"urban"* rather than *"rural"* in character and function and because it is located within the Greater Christchurch geographic area, and forms part of the related housing and employment markets.[53]

5.3.3 Similarly, the request identifies that the SPRZ is an *"urban activity"* for the purposes of aligning with the anticipated urban form within CRPS Chapter 6. This is in the absence of the SPRZ being

[51] RMA Part 1 section 2 Interpretation.

[52] PPC23 Section 32 Report Section 6 Strategic Planning Framework and Appendix J, September 2025.

[53] PPC23 Section 32 Report Section 6.4 NPS-UD, pg.35 & 36, September 2025.

referenced in Map A that illustrates the settled urban form for the Greater Christchurch sub-region to achieve consolidated residential and business growth. This position is formed on the premise that the SPRZ enables residential activities to be established at densities greater than 1hh/4ha and includes recreation facilities that service the urban populace.[54]

5.3.4 The Proponent identifies that the four properties in the north-western corner of the site that are currently subject to the RuUFZ are not an *"urban activity"* in the context of CRPS Chapter 6 or the CDP. Consequentially, NPS-UD Policy 8 is engaged for the purposes of determining the appropriateness of rezoning this additional rural land as *"unanticipated and out of sequence"* development capacity.[55]

Submissions received – Urban form

5.3.5 Nine (9) submission points cover urban form, which in summary:

a. Support PPC23 as the location and site context contributes to an appropriate urban form, including because the site isn't highly productive land, the development can be effectively coordinated through an ODP and consistency with strategic planning documents.[56]

b. Oppose PPC23 as the rezoning does not represent a *"well-functioning urban environment"* and is consequently considered to be urban sprawl that is inconsistent with relevant urban growth policies in the CRPS, the CDP SPRZ rules and national directions on urban development and freshwater management. Submission points identify that the rezoning will contribute to a loss of highly productive land and create a precedent for similar rezonings elsewhere in Ōtautahi Christchurch.[57]

c. Hold a neutral position but highlight the risks and issues with *"out of sequence"* development that can lead to poor urban form, higher infrastructure costs, poor environmental outcomes, and greater exposure to natural hazards.[58]

Analysis – Urban form

5.3.6 I have reviewed the PPC23 rationale against the NPS-UD, CRPS Chapter 6 and CDP provisions and in my opinion the SPRZ portion of the site is an *"urban environment"* and an *"urban activity"*[59] for the purposes of evaluating the appropriateness of the urban form it is seeking to establish. This is in the absence of clear directions in the NPS-UD on whether Specific Purposes Zones are *"urban environments"* or form part of the residential *"development capacity."*[60]

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[54] PPC23 Section 32 Report Section 6.5 CRPS, pg.39, September 2025.

[55] PPC23 Section 32 Report Section 6.4 NPS-UD, pg.36, September 2025.

[56] S08.1 TFBL, S40.1 A Neate, S52.1 Gramco Ltd and S58.1 D Tipple *(FS02 H&G Nimmo – Oppose)*.

[57] S32.1 C Elkington, S35.1 R Ennor, S71.1 K & A Buxton and S75.1 J Messerly *(FS01 T Wells & FS02 H & G Nimmo – Support)*.

[58] S69.3 ECan.

[59] CRPS – Definitions for Greater Christchurch - *"urban Activities"*, pg.252.

[60] NPS-UD, Part 1: Preliminary provisions - 1.4 Interpretation, pg.6 & 8.

5.3.7 I agree with the Proponent that the SPRZ enables activities that are more urban than rural in form, character and function. This is because it provides for residential and business services that are ancillary to a recreation and tourism operation that is required to be developed in accordance with a Development Plan.[61] I also agree with the Proponent that the SPRZ forms part of the labour market of Ōtautahi Christchurch as the zoning enables employment opportunities for recreation services as well as commercial and residential activities. Consequently, I consider that the SPRZ portion of the site qualifies as an *"urban environment"* in the context of the NPS-UD definition as it passes the two conjunctive tests.

5.3.8 I consider that the SPRZ forms part of metropolitan Ōtautahi Christchurch *"urban environment"* by virtue of it enabling 150 residential units, commercial accommodation and activities that were intended to provide recreational and tourism opportunities to meet the needs of the wider populace and contribute to Ōtautahi Christchurch's economy. This is despite the PPC23 site appearing as a predominantly rural environment that is near, but not adjacent to Spencerville and the rezoning seeking to enable development that is significantly different from the activities that can occur within the current SPRZ.

5.3.9 I disagree with the Proponent that the SPRZ is the same as some of the other Specific Purpose Zones referenced that do not feature on Map A. This is because Rolleston Prison and Burnham Military Camp are recognised as *"strategic infrastructure"* within the CRPS so do not enable the same level of residential activity as the CDP SPRZ.[62] However, I agree that the other examples provided by the Proponent, including the SPRZ Clearwater Golf Resort, distinguish Specific Purpose Zones from other non-urban activities within Ōtautahi Christchurch's territorial boundary. I also agree that the four additional properties are *"rural activities"*,[63] that the rezoning of this portion of the site to RNNZ does not immediately *"give effect"* to the settlement pattern illustrated in CRPS Map A and that this aspect of PPC23 represents *"unanticipated and out of sequence"* development capacity.

5.3.10 I disagree with the Proponent's position that the site has a direct relationship with the Prestons subdivision given the physical separation and the extent of RuUFZ land in between the two locations. This is particularly the case when considered against the CDP and CRPS Chapter 6 and urban consolidation principles and the site's relative isolation from Prestons to the south and Belfast to the west. This position is supported by Ms. Schröder's evidence where she concludes that the development that would be enabled by PPC23 is an isolated settlement rather than an extension to an existing urban area in the context of the prevailing urban form.[64]

5.3.11 The difference in opinion on whether the PPC23 site is contiguous with the nearest urban areas is material given the urban development that the existing SPRZ enables and the sites relative proximity to the historic settlement of Spencerville. There are also several examples of

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[61] CDP Chapter 13 Specific Purposes Zones, 13.9.1 Introduction and 13.9.2.1 Objective – Golf resort development.

[62] CRPS – Definitions for Greater Christchurch - *"Strategic Infrastructure"*, pg.252, and their operational capacity is protected from *"rural-residential activities"* in Policy 6.3.9.5. e, pg.86.

[63] CRPS – Definitions for Greater Christchurch - *"Rural Activities"*, pg.251.

[64] Evidence of Ms. Schröder, Appendix 5, para. 41 (a) and para. 121 (a), pg. 37.

standalone settlements across Ōtautahi Christchurch, including Kainga, Templeton, and Halswell. However, the geographic isolation of the PPC23 site identified above does emphasise the need for the Proponent to demonstrate that the relevant statutory NPS-UD, CRPS and CDP tests can be satisfied.

5.3.12 The balance of the site that is subject to the RuUFZ does not form part of the recognised urban area of Ōtautahi Christchurch. However, I agree with the rationale for extending the PPC23 site to encompass these additional four properties, which is also supported by Ms. Schröder's urban design assessment.[65] This is because it provides an urban form that is contained by Spencerville Road to the north, Turners Road and Teapes Road to the west, and the geophysical features of the Pūharakekenui-Styx River and lower terrace to the south and east. The extended site also optimises the use of the elevated north-western terrace for residential housing in response to the land constraints within the lower terrace and along the Pūharakekenui-Styx River margin. The additional yield that can be achieved by including this additional land also assists in making the servicing and infrastructure provision more viable.

5.3.13 While I support the rationale for integrating the additional four properties as an extension to the established SPRZ urban form, PPC23 still needs to address the effects of the rezoning and to *"give effect"* to the relevant objectives and policies of the NPS-UD, NPS-I, NPS-NH, NPS-FWM, NPS-HPL, CRPS Chapter 6 and the CDP. This includes whether PPC23 will deliver a *"well-functioning urban environment"* in the context of the urban form that would be established through the approval of PPC23. Another important consideration is the scale of the development that would be enabled by PPC23, with 800hh being significantly higher than the 279hh in Spencerville.[66] As a comparison, PPC23 seeks to establish a similar sized standalone urban environment to Templeton (720hh)[67] and Oxford (747hh) in Waimakariri District[68] and Diamond Harbour (1,002hh)[69] when considered collectively with Spencerville.

5.3.14 On the basis of the above assessment, I recommend the submissions that support the urban form of PPC23 are rejected. Similarly, I recommend that the opposing and neutral submissions are accepted. This is because PPC23 as notified does not satisfy the relevant *"well-functioning urban environment"* tests in respect to transport, accessibility, stormwater management and natural hazard risks. The Proponent is encouraged to provide the additional assessments listed in paragraph 1.1.8 to substantiate the appropriateness of the urban form that would be established through the approval of the rezoning.

5.3.15 Several submissions raise concerns that approving PPC23 would give rise to precedent effects by creating an expectation that other sites with a similar zoning may be approved, including locations in proximity to this site. However, it is a recognised principle that each private plan change request needs to be assessed on its merits and that decision-makers are not bound by the

[65] Evidence of Ms. Schröder, Appendix 5, para. 95, pg. 30.

[66] Stats NZ 2023 Census Spencerville-Brooklands QuickStats SA2 –https://stats.govt.nz/.

[67] Stats NZ 2023 Census, Templeton QuickStats SA2 - https://stats.govt.nz/.

[68] Stats NZ 2023 Census, Oxford QuickStats SA2 – https://stats.govt.nz/.

[69] Stats NZ 2023 Census, Diamond Harbour QuickStats SA2 – https://stats.govt.nz/.

outcome of other processes. I do not consider that the integrity of the CDP would be compromised by supporting PPC23 from an urban form perspective as there is only one other SPRZ, which applies to the fully developed Clearwater Golf Resort and its associated residential activities. I am not aware of any other Specific Purpose Zones within the CDP that would enable similar urban activities to the SPRZ so it is sufficiently unique to avoid any precedent effects or to compromise the integrity of the CDP should it be approved. Consequently, I recommend that the related submissions are rejected.

Recommendations - Urban form

5.3.16 On the basis of the above evaluations and as recorded in Appendix 4, I recommend that the submissions on urban form are accepted, rejected or rejected in part.

5.4 HOUSING AND BUSINESS SUFFICIENCY AND DEVELOPMENT FEASIBILITY

5.4.1 Housing and business sufficiency and the development feasibility of PPC23 need to be evaluated in the context of whether the rezoning of the site represents a *'well-functioning urban environment'* under the NPS-UD and the supporting planning instruments and strategic directions. It is also important to establish the economic effects of rezoning land to support additional housing capacity beyond the existing plan-enabled supply to establish consistency with the NPS-UD, CRPS and CDP. Similarly, it is important to establish the economic viability of the proposed Neighbourhood Centre to ensure it is an optimal use of the land and sufficient to meet the estimated local needs.

PPC23 – Housing and business sufficiency and development feasibility

5.4.2 The request and associated Section 32 evaluation include an assessment of the economic effects of rezoning the site.[70] This is supported by a specialist economic assessment and a technical memo provided in response to the initial request for further information.[71] The assessments evaluate the economic impacts of the increased housing capacity that would be enabled by PPC23 on the functioning of the housing market and related economic benefits. The assessment concludes that the rezoning will deliver a *"well-functioning urban environment"* from an economic perspective. The technical memo focuses on establishing the viability of the proposed Neighbourhood Centre, including its location, size and accessibility that was one of the items contained in Council's first request for further information.[72]

Submissions received – Housing and business sufficiency and development feasibility

5.4.3 Sixteen (16) submission points cover housing and business sufficiency and development feasibility, which in summary:

[70] PPC23 Section 32 Report – Section 4.1 Economic effects, pg.16, September 2025.

[71] PPC23 Insight Economics, Appendix A dated May 2025 and Appendix A (i) dated 25 July 2025.

[72] CCC 1st Request for further information – Item 3), pg. 1 & 2, 11 June 2025 - https://ccc.govt.nz/.

a. Support PPC23 as it will assist in addressing housing undersupply and provides a 'greenfield' housing option close to the city.[73]

b. Oppose PPC23 as there is sufficient zoned land to meet 30 years of projected housing need, there has been no provision made for affordable or social housing, the economic analysis exaggerates the housing demand and overstates the economic benefits, the development feasibility of the 800hh yield is questionable as the Proponent only owns a portion of the site and the commercial centre is insufficient to meet the needs that will be generated by the rezoning.[74]

c. Seek an alternate relief that an independent peer review of the Proponent's economic assessment is provided to establish the appropriateness of the proposed retail floor, any adverse retail distribution effects and whether the economic outcomes identified in PPC23 are consistent with the district, regional and national directions on housing and business development.[75]

Analysis - Housing and business sufficiency and development feasibility

5.4.4 A peer review of the Insight Economics assessment and technical memo has been carried out by Mr. Rodney Yeoman, Director at Formative Economics that is in Appendix 6 of this Report. Mr. Yeoman supports the rezoning on the basis that it may contribute net positive economic benefits. However, he is critical of the methodology applied by Insight Economics and considers that this contributes to the analysis and conclusions inflating the economic benefits and not substantiating the true costs of the rezoning.

5.4.5 In respect to the economic analysis, Mr. Yeoman makes the following conclusions:[76]

a. The Whisper Creek Golf resort is not commercially viable but the economic costs of removing the rural land from production or accommodating the residential development enabled by PPC23 elsewhere have not been sufficiently evaluated.

b. There is sufficient plan enabled housing supply to meet the long-term projected demand within Ōtautahi Christchurch, but the NPS-UD Policy 2 directions are a minimum requirement that do not preclude enabling additional capacity where the other relevant statutory tests are satisfied.

c. The residential capacity that PPC23 would enable is considered *"significant"* in the context of the NPS-UD Policy 9 and clause 3.8 responsive planning test and it has the potential to contribute to a *"well-functioning urban environment"* where the other relevant tests are satisfied.

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[73] S08.1 TFBL, and S58.1 D Tipple *(FS02 H&G Nimmo – Oppose)*.

[74] S14.1 SRA, S19.1 M van Valkenburg, S22.1 D Elkington, S23.1 R Howison *(FS02 H & G Nimmo – Support)*, S30.1 L Bennett, S32.1 C Elkington, S34.1 D Ling *(FS01 T Wells – Support)*, S54.1 J Lowe, S63.1 J Burns, S70.1 ŌRG *(FS01 T Wells & FS03 R Muschamp - Support)*, S71.1 K & A Buxton and S75.1 J Messerly *(FS01 T Wells and FS02 H & G Nimmo – Support)*.

[75] S75.8 J Messerly *(FS01 T Wells & FS02 H & G Nimmo – Support)*.

[76] Evidence of Mr. Yeoman, Appendix 6, para.5, pg.1 & 2.

d. The residential housing supply enabled by PPC23 would provide marginal economic benefits through additional competition, choice and affordability, although these benefits are less than what has been identified by Insight Economics and would likely be delivered elsewhere if PPC23 did not proceed.

e. The proposed Neighbourhood Centre is unlikely to give rise to retail distribution effects, but the size needs to be reduced from 3,000m^2 to 1,000m^2 GFA to avoid inefficient economic outcomes.[77]

5.4.6 I support Mr. Yeoman's position that PPC23 would add *"significant"* supply in the context of the NPS-UD requirement in Policy 8, within Ōtautahi Christchurch's housing and business market. I also agree that the requirement for 30-year supply plan-enabled capacity is not a ceiling that automatically precludes additional land being rezoned to provide additional market competition and housing choices. This is supported further by Mr. Yeoman's preliminary finding that the plan-enabled supply of residential 'greenfield' land could be exhausted within the 10-year medium-term timeframe of 2035.[78]

5.4.7 I have a different opinion to Mr. Yeoman in Section 5.3 above on whether the SPRZ portion of the PPC23 site is within the *"urban environment"* in the context of the NPS-UD and represents an *"urban activity"* in the context of CRPS Chapter 6. However, this divergence in opinion is not critical as we both agree that the site is within Ōtautahi Christchurch's housing and labour market and I am satisfied that the SPRZ is intended to be more urban than rural in form, function and character. I agree with Mr. Yeoman and the Proponent that the four rural RuUFZ properties do not meet the first NPS-UD *"urban environment"* qualifier as it is predominantly rural in character, form and function.

5.4.8 I support Mr. Yeoman's opinion and the submitters position that the minimum 15hh/ha density requirement across the site means that the offerings are likely to be the same as other 'greenfield' subdivisions across the Greater Christchurch sub-region. These factors are also likely to influence affordability and mean that there is unlikely to be any social housing provision. Consequently, I consider that PPC23 will deliver some minimal economic benefits through additional supply and market competition that will improve affordability in the context of NPS-UD Objective 2.

5.4.9 I also consider that the additional supply that would be enabled through PPC23 will assist to meet the demand for 'greenfield' subdivisions, standalone housing and the provision of larger residential lots, while emphasising that this provision would be small given that the minimum 15hh/ha density requirements need to be met across the site in accordance with the CDP Strategic Directions, objectives, policies and rules and CRPS objectives and policies.[79]

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[77] Evidence of Mr. Yeoman, Appendix 6, para.5, pg.1 & 2 and para. 95, pg.26.

[78] Evidence of Mr. Yeoman, Appendix 6, para.48 to 51, pg.11 & 12.

[79] CRPS Chapter 6 Policy 6.3.7 3. b. Residential location, yield and intensification and CDP Chapter 8 Subdivision, Development and Earthworks, 8.2.2.8 Policy – Urban Density, 8.5.1.3 (RD2) Subdivision activity table and 8.6.11 b. i. A. Additional standards for the RNNZ and Chapter 14 Residential 14.2.5.3 Policy – Development Density.

5.4.10 Mr. Yeoman evaluates the likely feasibility of developing the entire site, including the four rural properties in the north-eastern corner of the site.[80] I acknowledge Mr. Yeomans conclusion that there is no certainty that all the landowners within the PPC23 area would proceed to subdivide and develop the land should the rezoning be approved. I also agree that the related economic benefits would reduce proportionally based on the scale of development that is delivered to the housing market.

5.4.11 However, I have not placed weight on this evidence or the related submissions as these risks apply to all undeveloped zoned land held in multiple ownership. The feasibility of when any zoned land is optimal to subdivide and develop is subject to a range of market outcomes that cannot be controlled by a district plan, not least the landowners' economic circumstances and personal preferences. The NPS-UD responds to these externalities by requiring councils to ensure there is there is plan-enabled and commercially viable housing capacity available to ensure planning decisions support competitive housing markets.[81]

Neighbourhood Centre

5.4.12 I support Mr. Yeoman's conclusion that the Insight Economics assessment of the floor area required for the Neighbourhood Centre has not been substantiated. I agree that the ODP narrative should be amended to 1,000m^2 GFA to correspond with the 2,400m^2 land area to support the commercial feasibility of the proposed commercial centre in the absence of compelling evidence from the Proponent.

5.4.13 I recommend the following amendments to the PPC23 ODP narrative:

a. Amend item c. of the ODP narrative 8.10.31.D DEVELOPMENT REQUIREMENTS 2. OPEN SPACE, RECREATION AND COMMUNITY FACILITIES to reduce the GFA of the Neighbourhood Centre from 3,000m^2 to 1,000m^2 GFA.

5.4.14 These proposed amendments are evaluated in Appendix 2 and recorded in the schedule of amendments in Appendix 3.

5.4.15 The area that is dedicated to this Neighbourhood Centre within the ODP needs to be established by the Proponent to determine the optimal use for any surplus land. This is required to ensure the optimal size of the Neighbourhood Centre is identified in the ODP to ensure the most efficient use of the land available is achieved, including for residential housing and stormwater management. It would also reduce the risk of adverse economic effects associated with the land remaining vacant for extended periods of time.

5.4.16 I acknowledge that several submitters consider that the proposed 3,000m^2 Neighbourhood Centre is too small to meet localised needs, including for commercial offerings and community facilities. However, as established by Mr. Yeoman's expert evidence, the economic effects of

[80] Evidence of Mr. Yeoman, Appendix 6, para.110 & 113, pg.29 & 30.

[81] Including through the requirement for prescribing housing bottom lines, developing and implementing Housing and Business Capacity Assessment and Future Development Strategies and the responsive planning pathway.

increasing the GFA of the Neighbourhood Centre outweigh the benefits that could be achieved through an increased offering.[82]

5.4.17 I support the Proponent and Mr. Yeoman's conclusion that the proposed application of the NCZ to the consenting of the proposed Neighbourhood Centre is sufficient to manage any adverse retail distribution effects.[83] I agree with the rationale for the amendments sought by the Proponent and the CPD amendments recorded in Appendix K of PPC23, which I consider are effective methods for managing the development and operation of the proposed Neighbourhood Centre.[84]

5.4.18 Mr. Yeoman's evidence supports the relief sought by several submitters that an independent economic assessment of PPC23 is undertaken, which I recommend are accepted. It highlights several apparent deficiencies with the Insight Economics assessment that the Proponent has relied on to support the rezoning. These relate to the following matters that I encourage the Proponent to address through evidence:

a. An assessment of the economic costs and benefits, including the loss of rural land and other relevant externalities.

b. Substantiate the basis for relying on 'greenfield' residential development in Rolleston and Rangiora as the primary alternative options for prospective homeowners.

c. Substantiate the economic implications of PPC23 on other plan-enabled residential capacity elsewhere in Ōtautahi Christchurch to establish the economic costs and benefits associated with the rezoning.

d. Substantiate the plan-enabled residential 'greenfield' capacity in Ōtautahi Christchurch and the extent to which PPC23 contributes to this supply in the short (2028) and medium term (2035).

e. Substantiate how PPC23 will contribute to improved housing affordability.

f. The economic rationale for the 3,000m^2 Neighbourhood Centre and whether this needs to be reduced.

5.4.19 In summary, I consider that PPC23 is *"significant"* in the context of the housing and business market and that it will provide some economic benefits. I also consider that the SPRZ portion of the site is within the *"urban environment"* of Ōtautahi Christchurch but that the RuUFZ is not referenced as such in CRPS Map A, so the NPS-UD Policy 8 responsive planning provisions apply. I accept Mr. Yeoman's advice that PPC23 is likely to have minimal benefits to housing affordability and consider that accepting that the rezoning is likely to improve the choice for three-to-four-bedroom homes within a 'greenfield' setting. I consider that it would assist in improving the offering of residential 'greenfield' land within Ōtautahi Christchurch and the related housing

[82] Evidence of Mr. Yeoman, Appendix 5, para.136, pg.33.

[83] Evidence of Mr. Yeoman, Appendix 6, para.106 & 107, pg.28.

[84] PPC23 2nd Request for further information response, Item 1. Pg.1, 28 August 2025.

options that are likely to include standalone residential units due to the 15hh/ha density requirements.

5.4.20 Consequently, I recommend that the submissions in support of PPC23 because it will provide additional plan-enabled housing supply close to Ōtautahi Christchurch are accepted in part, while noting that additional economic assessments listed in paragraph 1.1.8 are required to substantiate the economic costs and benefits. Similarly, I recommend the submissions opposing PPC23 because there is already sufficient housing supply and it will not support affordable or social housing are rejected in part.

Recommendations - Housing and business sufficiency feasibility

5.4.21 On the basis of the above evaluations and as recorded in Appendix 4, I recommend that the submissions received regarding housing and business sufficiency are accepted in part or rejected in part.

5.5 CHARACTER, AMENITY AND VISUAL EFFECTS

5.5.1 The establishment of a more intensive and expanded SPRZ and rezoning RuUFZ land for residential activities in a relatively isolated location will alter people's appreciation of that area through a change in the environment that they have become accustomed to over time. It is important to evaluate the likely impact of this change on the area's character and amenity and the changes to the landscape values attributed to the site and its environs, including the sensitive Pūharakekenui-Styx River and its margins.

PPC23 - Character, amenity and visual effects

5.5.2 The request and associated Section 32 evaluation include an assessment of the landscape and urban design elements of PPC23, which includes a summary of the site context and the ODP boundary treatments and internal outcomes.[85] This is supported by a Landscape Visual Impact Assessment and Urban Design Assessment prepared by DCM Urban Design Limited (**DC-M**).[86] These assessments are supplemented by a consolidated Urban Design and Landscape Graphics[87] package that includes an updated plan set in response to the second request for further information.[88] These assessments conclude that PPC23 is consistent with the relevant urban design guidance, will deliver a *"well-functioning urban environment"* in the context of NPS-UD Policy 1 and contribute positive urban design and landscape and visual outcomes.

[85] PPC23 Section 32 Report – Section 4.6 Landscape and urban design, pg.22, September 2025.

[86] PPC23 DC-M, Appendix F Landscape and Visual Assessment dated May 2025, Appendix G Urban Design Assessment dated 25 July 2025.

[87] PPC23 DC-M, Appendix F (i) Landscape Graphics, updated 26 August 2025.

[88] CCC 2nd Request for further information – Items 1) to 4), 6 August 2025 - https://ccc.govt.nz/.

Submissions received – Character, amenity and visual effects

5.5.3 Fifty-one (51) submission points cover character, amenity and visual effects, which in summary:

a. Support PPC23 as it will offer lifestyle options and enhance the character and amenity of the area.[89]

b. Hold a neutral position but identify that PPC23 is far removed from the Whisper Creek golf resort concept and request that controls are included to preserve natural values.[90]

c. Oppose PPC23 as it will significantly increase the density of development in the area that will compromise the existing lifestyle living and small settlement character, undermine rural residential and rural amenity, result in adverse landscape and visual effects, and loss of openness.[91]

d. Seek an alternate relief that includes limiting the development to 165 houses, that more extensive road boundary setbacks and a greenbelt buffer with the lower terrace are provided in the ODP, the adverse effects are mitigated, a high standard of housing is specified and a larger portion of the site is utilised for stormwater management.[92] More specifically, one submission requests the following amendments to PPC23 and the CDP:[93]

   i. Non-complying activity for any subdivision that is inconsistent with the ODP that fails to satisfy RDA Rule RD 2 in 8.5.1.5.

   ii. A new ODP in Appendix 8.4.1.2 that includes existing and new roading, stormwater areas, areas to be protected for natural values and open space.

   iii. Reference the extended pedestrian and cycling network and internal loop road in the ODP and the relevant objectives and policies.

Analysis – Character, amenity and visual effects

5.5.4 A peer review of the DC-M assessments and Graphics Package has been carried out by Ms. Josie Schröder, Urban Designer and Director at Urban Opera that is in Appendix 5 and Ms. Nicola Smetham, Senior Landscape Architect at Rough Milne Mitchell Landscape Architects that is in Appendix 7 of this Report.

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[89] S12.1 A Greaves, S40 A Neate, S52.1 Gramco Ltd and S58.1 D Tipple *(FS02 H&G Nimmo – Oppose)*.

[90] S05.1 C Shaw, S46.1 & 46.2 A Hicks and S33.1 K & L Wells.

[91] S01.1 J Dutkiewicz, S02.1 S Blackler, S04.1 R Watson *(FS01 T Wells – Support)*, S06.1 S & K Baker, S09.1 M Pierce, S11.1 K Foot, S14.1 SRA, S15.1 K Van de Loo, S16.1 C Howison, S19.1 M van Valkenburg, S22.1 D Elkington, S23.1 R Howison *(FS02 H & G Nimmo – Support)*, S24.1 D Lowe, S25.8 SLLT; S30.1 L Bennett, S31.1 Angela *(FS01 T Wells – Support)*, S32.1 C Elkington, S33.4 K & L Wells; S35.1 R Ennor, S36.1 H King, S38.1 N Duxbury, S39.1 A Te Ohaere-Fox, S41.1 M Gilmore, S42.1 J Knight *(FS01 T Wells – Support)*, S43.1 K Bowden, S44.1 V Knowles, S45.1 D Knight *(FS01 T Wells – Support)*, S51.1 G Lowe, S53.1 R & K Winter, S54.1 J Lowe, S55.1 MWFT, S63.1 J Burns, S70.1 ŌRG *(FS01 T Wells & FS03 R Muschamp - Support)*, S71.1 K & A Buxton, S72.1 P Hargreaves, S74.1 M Wells and S75.1 J Messerly *(FS01 T Wells & FS02 H & G Nimmo – Support)*.

[92] S04.2 R Watson, S24.2 D Lowe, and S33.4 K & L Wells.

[93] S71.2 to 71.4 & 71.5 K & A Buxton.

5.5.5 Ms. Schröder does not support the rezoning in its current form as it will not achieve the required form and character outcomes for a new settlement, consistent with good urban design principles.[94] She considers there are several shortcomings with the methodology applied to evaluate the site context, including the site analysis and because the PPC23 Urban Design Assessment evaluates the indicative scheme plan and not the ODP, which overstate the urban design benefits.[95]

5.5.6 Ms. Schröder identifies the following concerns that she considers are significant:[96]

a. The lack of recognition of the context and character of the proposal as a standalone *"urban village"* or *"high amenity rural village"* within the ODP and associated narrative. This is required as the RNNZ rules were not developed to deliver village character in the context of a standalone settlement within the rural environment.

b. The absence of integration of the housing on the support terrace, including the effectiveness of the interface treatments, and whether the proposal will remain a standalone settlement or should be considered in the context of a future urban growth area.

c. The location and viability of the proposed Neighbourhood Centre and distribution of the Neighbourhood Parks.[97]

d. The increased density will result in a highly urbanised area within the rural environment that would compromise the character of the area.[98]

e. Variation in the built form is required, particularly where the site interfaces with existing roads, to effectively manage the character and amenity impacts of the rezoning and to effectively integrate the site into the local context.[99]

5.5.7 The following amendments to the PPC23 ODP are recommended to achieve the character that the rezoning is seeking to achieve (refer to Appendix ii of Ms. Schröders evidence[100]):[101]

a. Relocate the middle of the three Neighbourhood Parks from the *"Urban Parks and Stormwater Basins"* overlay to the upper terrace RNNZ portion of the site further to the north-west adjacent to the recommended additional pedestrian and cycling link.

b. Relocate the Neighbourhood Centre further to the west near the intersection of the two indicative Collector Roads.

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[94] Evidence of Ms. Schröder, Appendix 5, para. 10 and 11, pg. 6 and para. 121, pg.36.

[95] Evidence of Ms. Schröder, Appendix 5, para. 25 & 26, pg. 10 & 11, para. 34, pg. 12 and para.40, pg.15.

[96] Evidence of Ms. Schröder, Appendix 5, para. 8 (b), (c), & (e), pg. 4 and para. 38, pg.13.

[97] Evidence of Ms. Schröder, Appendix 5, para.41 (e) to (f), pg. 16 & 17.

[98] Evidence of Ms. Schröder, Appendix 5, para. 41 (c), pg. 16.

[99] Evidence of Ms. Schröder, Appendix 5, para. 102 to 105, pg. 32 & 33.

[100] Evidence of Ms. Schröder, Appendix 5, Appendix ii, pg. 40.

[101] Evidence of Ms. Schröder, Appendix 5, para. 9, pg. 4 & 5, and para.73 to 87, pg.25 to 28.

c. Amend item a. 6. of the ODP narrative 8.10.31C DEVELOPMENT FORM AND DESIGN by replacing the existing narrative that is required to deliver the urban village character that PPC23 is seeking to achieve.

d. Staging that includes the early allocation of land for the Neighbourhood Centre.

e. Provision of building typologies that include standalone housing, duplex, terrace and apartment typologies for whole-of-life housing choice and to promote diversity.

f. Subdivision to be undertaken in accordance with Ngāi Tahu Subdivision and Development Guidelines that incorporate appropriate environmentally sustainable design principles.

g. Variation in building height (between one and two storey) and increasing internal setbacks to provide for a distance of at least 6m between any future buildings fronting Spencerville Road and Turners Road.

5.5.8 In respect to visual effects specifically, the Pūharakekenui-Styx River is a sensitive natural environment that is a Significant Feature (SF3.0) within the Natural Landscape overlay of CDP that applies to the river corridor and extends into a small portion of the site.[102] PPC23 proposes to retain the OWMZ that encompasses the proportion of the site that is subject to this overlay.

5.5.9 Ms. Smetham considers that the receiving environment has a modified natural character and a rural and semi-rural lifestyle character.[103] She does not support the rezoning as PPC23 does not adequately address the landscape and visual effects or achieve the landscape character and visual amenity outcomes in the relevant CDP objectives and policies.[104] Ms. Smetham considers that the PPC23 ODP as notified will enable development with moderate to high effects on landscape values associated with the increased density of built form, reduced building setbacks and the prominence of residential development within an existing open, semi-rural landscape, particularly at the interface with the surrounding RuUFZ.[105]

5.5.10 She identifies several shortcomings with the methodology applied by the Proponent to evaluate the landscape and visual effects. These include the insufficient application of assessment principles, the lack of consideration between landscape values and visual amenity effects, and the absence of a meaningful comparison of PPC23 with the SPRZ permitted baseline.[106] In addition, the visual effects should have been evaluated against the development that would be enabled by the ODP rather than the indicative scheme plan and the relevant CDP provisions should have been referenced. These apparent shortcomings limit the ability to evaluate the level of change that would be enabled by the rezoning and the resulting landscape and visual effects. Consequently, Ms. Smetham considers that the PPC23 landscape and visual assessment is not

[102] CDP Chapter 9 Natural and Cultural Values, 9.2.9 Appendices – Appendix 9.2.9.1.3 Significant Features.

[103] Evidence of Ms. Smetham, Appendix 7, para. 52 & para.56, pg.12 & 13.

[104] Evidence of Ms. Smetham, Appendix 7, para. 13, pg.4.

[105] Evidence of Ms. Smetham, Appendix 7, para. 168 to 170, pg.41.

[106] Evidence of Ms. Smetham, Appendix 7, para. 6, pg.3, para.38, pg.10, and para. 166, pg.41.

reliable enough to support the conclusions reached and that it overstates the potential positive landscape and visual effects.[107]

5.5.11 Ms. Smetham also notes the absence of information on the levels of fill to mitigate the natural hazard risks associated with the site that will likely increase the visual and amenity effects.[108] She records that an updated Landscape and Visual Assessment is required that accounts for the visual effects from the likely increase in ground levels associated with the importation of fill, an assessment of the SPRZ permitted baseline that evaluates the level of change and the consideration of the mitigation treatment necessary to integrate the boundary lots with the receiving environment.[109]

5.5.12 I accept Ms. Smetham's opinion and consider that it is critical that these priority issues are addressed in a supplementary Landscape and Visual Assessment that I encourage the Proponent to provide as part of their evidence.

5.5.13 Ms. Smetham considers that the rezoning as notified will give rise to adverse visual effects and will not be consistent with the CDP provisions for maintaining the appropriate levels of character and amenity attributed to the receiving environment. She recommends that the following amendments are made to the PPC23 ODP to reduce the visual effects from moderate to high to low to moderate:[110]

a. The location of the proposed Neighbourhood Centre and distribution of the Neighbourhood Parks, which is also recommended by Ms. Schröder and detailed in the amendments listed paragraph 5.5.7.).[111]

b. Subdivision to be undertaken in accordance with Ngāi Tahu Subdivision and Development Guidelines, which is also recommended by Ms. Schröder and detailed in the amendments listed paragraph 5.5.7.).[112]

c. The following development controls are incorporated into the narrative:[113]

   i. 60% of the lots that front Spencerville Road and Turners Road are at least 1,000m^2 in size.

   ii. The minimum front boundary building setback from Turners Road and Spencerville Road is extended from 10m to 20m.

   iii. The internal minimum building setback is increased from 1m to 3m (to provide a minimum 6m distance between any future buildings) for properties that front Spencerville Road and Turners Road.

   iv. The maximum building height is reduced from 8m to 5m.

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[107] Evidence of Ms. Smetham, Appendix 7, para. 8 & 9, pg.3 and para. 165 & 166, pg.41.

[108] Evidence of Ms. Smetham, Appendix 7, para. 82 & 83, pg.20 & 21.

[109] Evidence of Ms. Smetham, Appendix 7, para. 133, pg.32.

[110] Evidence of Ms. Smetham, Appendix 7, para. 12, pg. 4 and para. 171, pg.42 & 43.

[111] Evidence of Ms. Smetham, Appendix 7, para.87, pg. 20.

[112] Evidence of Ms. Smetham, Appendix 7, para.88, pg. 20 & 21.

[113] Evidence of Ms. Smetham, Appendix 7, para. 153 to.155, pg.37 & 38, and para.171, pg.41 & 42.

5.5.14 I support Ms. Schröder and Ms. Smetham's evidence that the PPC23 ODP as notified does not provide sufficient certainty that the urban environment that is sought as an objective of the rezoning will be delivered without the introduction of additional development controls. I accept their opinions that these are necessary to integrate and connect the site with the land use activities within and adjacent to the site and to mitigate the adverse visual effects the development would present to the semi-rural receiving environment.

5.5.15 I support Ms. Schröder's evidence that the inability to accommodate any residential development within the lower terrace means that there would be a concentrated density of built form on the upper terrace that requires design interventions to achieve appropriate levels of character and amenity and integration with the surrounding environment. I also accept Ms. Smetham's evidence that additional development controls are required to reduce the landscape and visual effects (from high to moderate) to moderate to low.

5.5.16 I consider that this evidence substantiates the need for additional ODP requirements to support the proposed interface treatments and to respond to the site context, which includes the development constraints that are reflected in the need to apply the Qualifying Matters to the rezoning.

5.5.17 Consequently, I recommend that the ODP plan is amended to record the amended locations of the Neighbourhood Park and Neighbourhood Centre and that narrative in item 6. of 8.10.31C Development Form and Design of the ODP narrative is updated to better reflect the site context and the objective of the rezoning (refer to paragraphs 5.5.7 a. to c. and 5.5.13 a. above). I also support the inclusion of the requirement for 60% of the lots that front Spencerville Road and Turners Road to be at least 1,000m^2 in size (refer to paragraph 5.5.13 c. i. above). While not mitigating all the adverse visual effects identified by Ms. Smetham, it would assist in integrating the site into the local environment and reducing the visual effects on the immediate receiving environment.

5.5.18 While Ms. Schröder and Ms. Smetham usefully list several other development controls in paragraphs 5.5.7 d. to g. and 5.5.13 b. and c. ii. to iv., I am mindful that these are very detailed for inclusion within an ODP and may present implementation challenges with Plan Users having to consider these ODP requirements against the existing CDP RNNZ rules and subdivision standards. Furthermore, the combination of these development controls may limit the amount of developable land that remains within the future parcels along these road boundaries. It is also unclear what components of the Ngāi Tahu Subdivision and Development Guidelines should be integrated into the CDP. Consequently, I encourage the Proponent to consider these development controls as part of the addendum Landscape and Visual Assessment and Urban Design Assessment that are requested to be provided in paragraph 1.1.8 above.

5.5.19 On the basis of the expert evidence and in the absence of the Proponent's evidence, I support the neutral relief that requests the inclusion of additional development controls. Similarly, I support the submissions that oppose PPC23 on the grounds that the rezoning is likely to compromise the character and amenity of the area and contribute to adverse visual effects. Consequently, I recommend that these submission points are accepted.

5.5.20 I support and adopt Ms. Schröder's conclusion that the provision of lots that range in size from 1,000m^2 to 10,000m^2 are not appropriate and recommend that the related submission points are rejected.[114] Consequently, I recommend that the alternate relief that the development enabled by PPC23 is restricted to 165hh and related mitigation are rejected as this significant change isn't supported by the expert evidence.

5.5.21 I recommend that the alternate relief in the submission point that requests the CDP is amended to require a non-complying activity consent where a subdivision fails to satisfy the subdivision activity requirements, amendments to the CDP objectives and policies and the inclusion of matters of discretion references are rejected. This is because it would represent a fundamental change to the CDP RNNZ and Subdivision Chapters to address effects that may be able to be more effectively addressed through refinements to the ODP.

5.5.22 The same submission requests that a new ODP is inserted in Appendix 8.4.1.2, which appears to be a typographical error as this provision clarifies that the zone-specific standards take precedence where there are inconsistency with other general standards.[115] This amendment would duplicate the key CDP amendment being sought through PPC23, which is to replace the existing SPRZ Whisper Creek Development Plan in Appendix 13.9.7.2 with a new RNNZ ODP in Appendix 8.10.31. I consider that this amendment would be ineffective and may compromise the efficient administration of the CDP.

5.5.23 These proposed ODP amendments are evaluated in Appendix 2 and recorded in the schedule of amendments in Appendix 3.

Recommendations - Character, amenity and visual effects

5.5.24 On the basis of the above evaluations and as recorded in Appendix 4, I recommend that the submissions received on character, amenity and visual effects are accepted, accepted in part, rejected or rejected in part.

5.6 INFRASTRUCTURE, LAND DEVELOPMENT AND NUISANCE EFFECTS

5.6.1 The coordination and cost-efficient provision of infrastructure, utility services and community facilities are a critical aspect of *"well-functioning urban environments."* This is particularly the case for relatively isolated sites where there is limited infrastructure available to support urban development and to provide the levels of service anticipated by current and future residents, businesses, organisations, and visitors.

PPC23 – Infrastructure, land development, and nuisance effects

5.6.2 The request and associated Section 32 evaluation include an assessment of the PPC23 infrastructure requirements, including water and wastewater supplies, stormwater management

[114] Evidence of Ms. Schröder, Appendix 5, 116, pg. 35.

[115] S71.4 K & A Buxton.

and power and telecommunication connections.[116] This is supported by an Infrastructure Report prepared by Davie Lovel-Smith Limited (**DL-S**)[117] and a Stormwater Memo[118] provided in response to the request for further information. The Infrastructure Report covers a range of matters, including the site characteristics (soil, geotechnical conditions and contaminated land), flooding, earthworks, stormwater, roading, and utilities. It concludes that stormwater will be stored and treated on site and involve bulk earthworks to form attenuation and treatment facilities and opportunities for wetland restoration and ecological enhancement.[119] A new water bore and reticulated network will be installed with suitable treatment and wastewater will be pumped to the upgraded Heyders Road pump station and onto the Bromley wastewater treatment plant.

5.6.3 The DL-S Stormwater Memo responded to five request for further information items following correspondence and a meeting between the Proponent's Civil Engineer and Council's Senior Stormwater Planning Engineer, Mr. Norton. The memo acknowledges Council's concerns, while providing updated flood modelling and sizing of the stormwater management facilities that are considered in more detail in the natural hazard's evaluation in Section 5.8 below.

5.6.4 The PPC23 AEE[120] and Proponents request for further information response[121] outline the rationale for the Neighbourhood Parks provision and active movement network in the ODP in Appendix K of PPC23.

Submissions received – Infrastructure, land development and nuisance effects

5.6.5 Ninety-nine (99) submission points cover infrastructure that includes water, wastewater and stormwater, utility services, reserves and community facilities, and the effects of land development, which:

Infrastructure

a. Support PPC23 as it will improve stormwater management along the existing drain.[122] One submission point supports the rezoning in part where staging and integrated (3Waters) infrastructure is coordinated to assist in managing Ōuruhia Model School.[123]

b. Hold a neutral position but identify the need to manage growth to protect surface water, groundwater and hydrological systems through minimum engineering design standards to ensure the potable water supply does not compromise the existing well supplies. Additional matters include the need for stormwater run-off to comply with Council's Styx River stormwater discharge consent conditions, and for a monitoring program to manage water quality. The ability for the Proponent to obtain resource consents under the LWRP and that

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[116] PPC23 Section 32 Report – 4.2 Infrastructure, pg.16 to 18, dated September 2025.

[117] PPC23 DL-S, Appendix B Infrastructure Report, dated May 2025.

[118] PPC23 DL-S, Appendix B I Infrastructure Stormwater memo, dated 29 July2025.

[119] PPC23 DL-S, Appendix B Infrastructure Report, 9. Conclusion, pg.24, dated May 2025.

[120] PPC23 Section 32 Report – 3.6 Open Space and Reserves, pg.13 & 14, dated September 2025.

[121] PPC23 1st Request for further information response – Item 8. A), pg.3, 7 July 2025 - https://ccc.govt.nz/.

[122] S25.1 SLLT.

[123] S59.4 ŌMS.

the provision of 3Waters utilities is consistent with the NPS-UD Policy 8 outcomes is also identified.[124]

c. Oppose PPC23 because the rezoning and subsequent land development will compromise water pressure, the quality and access to groundwater, and the local hydrological system, there is insufficient water and wastewater capacity, the sewerage odour at the corner of Lower Styx Road and Seabrook Drive suggests the wastewater network is already at capacity, and increased stormwater run-off and associated sediment.[125]

d. Seek an alternate relief that includes the provision of additional evidence to mitigate the infrastructure servicing effects and to address deficiencies in the technical assessments through the provision of additional stormwater capacity analysis, flood and tidal modelling, infrastructure funding plan and amendments to the rezoning and ODP to manage run-off and stormwater.[126]

Utilities

e. Oppose PPC23 because there is a lack of telecommunication and power utility services in the area to support the additional demand.[127]

Neighbourhood Parks

f. Support PPC23 as it will improve the recreational opportunities in the area,[128] while there are neutral submissions that require the developer to partner with the SLLT and include additional reserve requirements similar to the Whisper Creek golf resort.[129] Two submission points oppose PPC23 on the basis that there are insufficient amenities provided and there needs to be a substantial native greenbelt.[130]

Land development and nuisance effects

g. Oppose PPC23 because the land development works and additional population will generate unreasonable nuisance effects relating to dust, vibration and light spill and adverse effects on the environment associated with stormwater management and the importation of fill.[131]

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[124] S18.1 Z Duan, S25.9 SLLT, S33.3 K & L Wells and S69.1 to 69.3 ECan.

[125] S02.1 S Blackler, S06.1 S & K Baker, S11.1 K Foot, S13.1 J Kennedy, S14.1 SRA, S16.1 C Howison, S17.1 T Wilson, S19.1 M van Valkenburg, S20.1 R Riwaka, S21.1 C Mitchell, S22.1 D Elkington, S23.1 R Howison *(FS02 H & G Nimmo – Support)*, S24.1 D Lowe, S26.2 C Wakelin, S28.1 D Parker, S29.1 M Stewart, S30.1 L Bennett, S31.1 Angela *(FS01 T Wells – Support)*, S32.1 C Elkington, S34.1 D Ling *(FS01 T Wells – Support)*, S35.1 R Ennor, S37.1 M Skelly, S41.1 M Gilmore, S42.1 J Knight *(FS01 T Wells – Support)*, S43.1 K Bowden, S45.1 D Knight *(FS01 T Wells – Support)*, S47.1 J Burney; S51.1 G Lowe, S54.1 J Lowe, S55.1 MWFT, S57.1 J Hawkins, S61.1 P McGuigan, S62.1 A McKenzie, S63.1 J Burns, S64.1 G Cockerill *(FS02 H & G Nimmo – Support)*, S65.1 C Faithfull, S68.1 L Maurice, S70.1 ŌRG *(FS01 T Wells & FS03 R Muschamp - Support)*, S71.1 K & A Buxton, S74.1 M Wells and S75.1 J Messerly *(FS01 T Wells & FS02 H & G Nimmo – Support)*.

[126] S24.2 D Lowe, S29.2 M Stewart, S52.1 Gramco Ltd, S61.1 P McGuigan, S73.5 T Watson-Wells and S75.2, 75.3 & 75.6 J Messerly.

[127] S06.1 S & K Baker and S41.1 M Gilmore.

[128] S07.1 D & K Casey, S08.1 TFBL and S25.1 SLLT.

[129] S25.2 SLLT.

[130] S46.2 A Hicks and S51.1 G Lowe.

[131] S01.1 J Dutkiewicz, S02.1 S Blackler, S03.1 I Blackler, S06.1 S & K Baker, S14.1 SRA, S19.1 M van Valkenburg, S23.1 R Howison *(FS02 H & G Nimmo – Support)*, S24.1 D Lowe, S26.1 C Wakelin, S30.1 L Bennett, S31.1 Angela *(FS01 T Wells – Support)*, S34.1 D Ling *(FS01 T Wells – Support)*, S36.1 H King, S63.1 J Burns, S68.1 L Maurice, S70.1 ŌRG *(FS01 T Wells & FS03 R Muschamp - Support)*, 73.1 T Watson-Wells and S75.1 J Messerly *(FS01 T Wells & FS02 H & G Nimmo – Support).*

h. Nine (9) submission points seek an alternate relief that the land development is sequenced, appropriate management plans are in place, public health assessments are undertaken and the adverse effects referenced in their primary relief are mitigated.[132] Two (2) neutral submission points request that any adverse construction phase traffic effects, light spill nuisance and on the Pūharakekenui-Styx River ecosystem and birdlife are mitigated.[133]

Community facilities

i. Support PPC23 as it will assist Ōuruhia Model School to grow and maintain long-term viability,[134] while one submission supports the rezoning in part where the ODP makes provision for staged development to assist with managing the school roll.[135] Five (5) submission points oppose PPC23 because the capacity of the school is constrained, there are no community facilities and insufficient amenities proposed to support the additional population.[136]

Analysis – Wastewater and water

5.6.6 A peer review of the DL-S Infrastructure Report has been carried out by Ms. Michele McDonald, Team Leader: Asset Planning – Water and Wastewater at Council that is in Appendix 8 of this Report.

5.6.7 On the basis of Ms. McDonald's evidence, I consider that there is sufficient information to evaluate the appropriateness of PPC23 on water and wastewater utilities. Therefore, I reject the submissions that oppose PPC23 on the grounds that there is inadequate information available to understand the impacts of the rezoning on the water and wastewater network.

5.6.8 Ms. McDonald makes the following conclusions on the provision of water and wastewater services to the PPC23 site:[137]

a. The PPC23 is not serviced by reticulated water supply or wastewater networks.

b. The site can be serviced by establishing new treated water sources, extending the water and wastewater networks and undertaking targeted wastewater upgrades that are funded by the Proponent, designed and constructed in accordance with the relevant engineering standards, minimum design requirements and Infrastructure Provider Agreements and vested in Council where appropriate.

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[132] S04.2 R Watson, S14.4 SRA, S19.4 M van Valkenburg, S23.4 R Howison, S24.2 D Lowe, S25.7 SLLT, S63.1 J Burns, S70.4 ŌRG, S73.3 T Watson-Wells and S75.9 J Messerly *(Supported by FS01 T Wells and FS02 H & G Nimmo)*.

[133] S25.7 SLLT and S25.9 SLLT.

[134] S07.1 D & K Casey, S08.1 TFBL and S59.1 ŌMS.

[135] S59.2 ŌMS.

[136] S22.1 D Elkington, S29.1 M Stewart, S32.1 C Elkington, and S51.1 G Lowe.

[137] Evidence of Ms. McDonald, Appendix 8, para. 3 & 4, pg.2.

c. Several changes are recommended to the PPC23 ODP narrative to provide certainty that the outcomes sought by the rezoning can be realised when the detailed design of the water and wastewater networks are undertaken.[138]

5.6.9 Ms. McDonald usefully outlines the existing reticulated water services available in the Brooklands and Kainga water supply zone, confirming that there is no residual capacity.[139] She records that new groundwater water sources, treatment plant and water supply network will need to be sized to meet peak demand requirements and minimum flows for firefighting.[140] Sufficient sized land will need to be set aside for any new groundwater abstraction and the water treatment plant with appropriate access provided for maintenance. An Infrastructure Provider Agreement will need to be established between the Proponent and Council as part of any future consenting process to coordinate the establishment works, vesting and funding arrangements.[141]

5.6.10 Ms. McDonald establishes that there is no reticulated wastewater network in the area but that the local pressure sewer network proposed by the Proponent would be able to be accommodated in the 300mm diameter gravity sewer that is established in Lower Styx Road.[142] The increased flows to the Heyders Road Pumpstation would exceed the available capacity and require the Proponent to upgrade the pumpstation in accordance with an Infrastructure Provider Agreement.[143] Council would retain the discretion through any future consenting process to accept the individual on-site local pressure sewer units as network infrastructure or whether they would remain in private ownership.[144]

5.6.11 Ms. McDonald recommends additional ODP narrative to record that decisions on whether the individual local pressure sewer units are vested in Council will be determined at the subdivision stage. However, decisions on whether these onsite facilities in other locations where there are servicing constraints that require local pressure sewer units are typically determined through the subdivision process as part of the post consent approval process. Therefore, I do not consider it is necessary to reference this standard process in the PPC23 ODP.

5.6.12 I support Ms. McDonald's conclusion that the PPC23 area can be serviced with water and wastewater connections to Council's reticulated network and that there are appropriate processes to require that the levels of service and costs associated with the necessary upgrades are reasonable. This includes to the extent necessary to satisfy the NPS-UD clauses 3.2 to 3.5 in respect to the site being *"infrastructure ready"* with reticulated water and wastewater services. I am also confident that there are standard processes for ensuring the associated establishment works, extensions and upgrades are undertaken to service the additional housing capacity to the necessary engineering standards. These requirements can be adequately managed through the

[138] Evidence of Ms. McDonald, Appendix 8, para. 42, pg.8 & 9.

[139] Evidence of Ms. McDonald, Appendix 8, para. 16 & 17 and 19 to 21, pg.3 & 4.

[140] Evidence of Ms. McDonald, Appendix 8, para. 18, pg.3.

[141] Evidence of Ms. McDonald, Appendix 8, para. 23 & 24, pg. 5.

[142] Evidence of Ms. McDonald, Appendix 8, para. 27, pg.6.

[143] Evidence of Ms. McDonald, Appendix 8, para. 30, pg.6 & 7.

[144] Evidence of Ms. McDonald, Appendix 8, para. 31, pg.7.

CDP RNNZ and subdivision provisions and Council's engineering requirements.[145] Similarly, I am satisfied that the ODP makes sufficient provision for the efficient and effective provision of reticulated water and wastewater services to the PPC23 site.

5.6.13 I accept Ms. McDonald's conclusion that the establishment of new wells to abstract the potable water necessary to service the PPC23 site would not compromise the operation of the other wells established in the area.[146] I also agree that the provision of a local pressure on-site sewer network is an appropriate and sufficiently robust solution to respond to the ground conditions and high groundwater table and that it would not contribute to any odour related issues.[147] On the basis of Ms. McDonalds evidence, I recommend that the submissions that oppose PPC23 due to water and wastewater servicing concerns and the related neutral submissions are rejected.

5.6.14 I support Ms. McDonalds recommended amendments to the PPC23 ODP to ensure the outcomes of the rezoning in respect to water and wastewater networks are realised through any subsequent consenting processes should the rezoning be approved, including:[148]

a. Amend the title of item of the ODP narrative 8.10.31D DEVELOPMENT REQUIREMENTS – 5. WATER AND WATEWATER to better align with the Council Three Waters activity description, including the Water Supply and Wastewater Bylaws.

b. Amend a. of the ODP narrative in 8.10.31D DEVELOPMENT REQUIREMENTS - 5. WATER AND WASTEWATER by replacing the existing narrative to mandate compliance with Council's standards and minimum requirements and to make it clear that a single water bore may not be sufficient.

c. Replace item c. of the ODP narrative in 8.10.31D DEVELOPMENT REQUIREMENTS - 5. WATER AND WASTEWATER to confirm the pressure main that services a local pressure sewer network forms part of the network and is not referred to as a rising main and it is necessary to mandate compliance with Council standards and minimum requirements.

5.6.15 These proposed amendments are evaluated in Appendix 2 and recorded in the schedule of amendments in Appendix 3.

Analysis – Stormwater

5.6.16 A peer review of PPC23 and the DL-S assessments has been carried out by Mr. Brian Norton, Senior Stormwater Planning Engineer at Council that is in Appendix 9 of this Report.

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[145] For example, Chapter 8 Subdivision, Development and Earthworks activity standards 8.6.7 Water supply and 8.6.8 Wastewater supply, 8.7.4.3 Servicing and infrastructure and 8.8.6 Servicing and Chapter 14 Residential 14.12.2 Built form standard 14.12.2.15 Water supply for firefighting, and 14.15 Rule – Matters of control and discretion.

[146] Evidence of Ms. McDonald, Appendix 8, para. 35, pg.7.

[147] Evidence of Ms. McDonald, Appendix 8, para. 36 to 39, pg.7 & 8.

[148] Evidence of Ms. McDonald, Appendix 8, para. 42, pg.9 & 10.

5.6.17 Mr. Norton makes the following conclusions with respect to the management of stormwater within and beyond the PPC23 site:

a. The PPC23 site will need to establish stormwater management facilities that treat and discharge run-off in accordance with the relevant Council Pūharakekenui-Styx Stormwater Management Plan, Waterways, Wetlands and Drainage Guide and Council's stormwater network discharge consents.[149]

b. Specifically designed stormwater facilities are required within the Styx Catchment to attenuate water and manage peak stormwater flows. However, the PPC23 Infrastructure Report has not established how the future effects of elevated groundwater combined with long-term SLR projections on the functioning of the proposed stormwater basins and wetlands will be managed or mitigated.[150]

c. Compensatory stormwater storage is required where any fill is proposed within the existing or future floodplain as amended by any development works to offset the loss of live flood storage.[151] This additional storage capacity is required to ensure that the PPC23 site does not displace ponded flood waters onto adjacent low-lying properties.

d. The development enabled by PPC23 can mitigate its effects on stormwater where:

   i. An Infrastructure report is provided to establish how future effects of elevated groundwater, coupled with long term SLR projections on the functioning of the proposed stormwater facilities, will be managed and mitigated.

   ii. The ODP narrative is amended to require that the flood volume of the High Hazard Management Area is not reduced.

5.6.18 On the basis of Mr. Norton's evidence and pending the provision of the Proponent's Infrastructure Report listed above, I consider that there is insufficient information to evaluate the appropriateness of PPC23 on the stormwater system within and beyond the site. Therefore, PPC23 as notified does not sufficiently address the concerns raised in the evidence that stormwater can be effectively managed to the extent necessary to avoid adverse effects. Consequently, I recommend that the submissions that oppose PPC23 pending the provision of additional evidence to establish and mitigate effects and establish consistency with the higher order instruments are accepted.

5.6.19 Similarly, I support the alternate relief sought in submissions that the Proponent needs to address this in evidence, including the need for additional ODP requirements to manage stormwater in accordance with Council's stormwater discharge consents pending the Proponent's evidence. I note that several submissions raise legitimate concerns with the management of stormwater and flood risks, which are evaluated in more detail in Section 5.8 of this Report.

[149] Evidence of Mr. Norton, Appendix 9, para. 26, pg. 4 & 5.

[150] Evidence of Mr. Norton, Appendix 9, para. 29 to 31, pg. 5 & 6.

[151] Evidence of Mr. Norton, Appendix 9, para. 32, pg.6.

5.6.20 I support the recommended amendments to the PPC23 ODP to ensure the outcomes of the rezoning in respect to stormwater management are realised through any subsequent consenting processes, including:

a. Add a new item d. to the ODP narrative 8.10.31D DEVELOPMENT REQUIREMENTS - 4. STORMWATER to specify that the flood volume of the High Hazard Management Area that applies to the site will not be reduced because of any development works, would PPC23 be approved.

5.6.21 These proposed amendments are evaluated in Appendix 2 and recorded in the schedule of amendments in Appendix 3.

5.6.22 I recommend the submissions that oppose PPC23 because of the need to undertake specific stormwater monitoring, adhere to minimum engineering standards to protect stormwater and the hydrological system and comply with the LWRP rules are rejected. This is because these matters would covered by any future resource consent processes should PPC23 be accepted.

5.6.23 I do not support the relief that requests an alternate *"Conservation Zone"* is applied to the lower terrace High Flood Hazard Management Area FHMA portion of the site as the Qualifying Matters and RuUFZ ensure that residential development is limited within these locations. Similarly, the existing OWMZ extends along the riparian corridor and would effectively manage the future land use activities that could occur within this portion of the site.

Analysis - Utilities

5.6.24 The PPC23 Infrastructure Servicing Report outlines the approach for establishing power and telecommunication services to the site and each property.[152] I consider that the determination of the future connections to power and telecommunication services is best managed at the time of subdivision following engagement with utility service providers by the developer. I am satisfied that the standard subdivision process addresses the submitter's concerns as it requires that power and telecommunication services are installed prior to records of title being issued, at which point the levels of service are managed by service providers in accordance with industry standards.[153] Consequently, I recommend that the submissions opposing PPC23 because there would be insufficient utilities available to service the site are rejected.

Analysis – Neighbourhood Parks

5.6.25 Mr. Peter Barnes, Senior Parks and Policy Planner at Council has prepared evidence that is in Appendix 10 of this Report that records his opinion on the Neighbourhood Parks provision in PPC23.

[152] PPC23 DL-S, Appendix B Infrastructure Report, 8, Power/Telephone/Street Lights, pg.20, dated May 2025.

[153] For example, Chapter 8 Subdivision, Development and Earthworks general matter 8.7.4.3 Servicing and infrastructure and Chapter 14 Residential Chapter 14.15 Rule – Matters of control and discretion in respect to compliance with the ODP.

5.6.26 The size and location of the Neighbourhood Parks were identified and addressed during the request for further information process, where the Proponent amended the ODP in response to advice received from Council's Parks and Reserves Team.[154] Mr. Barnes confirms that the PPC23 ODP makes appropriate provision for three Neighbourhood Parks that are each approximately 3,000m^2 in size achieve Council's levels of service proximity and accessibility metrics (no more than 500m or 80% of residents).[155] These Neighbourhood Parks would be expected to include playground facilities and be co-located with the stormwater basins to maximise passive recreation opportunities, which I consider is appropriate and consistent with similar urban environments across Ōtautahi Christchurch.[156]

5.6.27 I support Mr. Barnes' conclusion that active recreation areas have been adequately provided for in the PPC23 ODP through the provision of a network of publicly accessible walkways that would promote active travel modes and movement through the settlement and to key destinations near the site. These are likely to be vested in Council as Local Purpose Reserve or located within the public road reserve[157] following an assessment under the relevant CDP provisions and reserves policies.[158] Therefore, I recommend that the submissions that oppose PPC23 because there is insufficient reserve land are rejected. Mr. Barnes does not identify any constraints to Ms. Schröder's recommendation to move the middle of the three Neighbourhood Park locations from the PPC23 ODP *"Urban Parks and Stormwater Basins"* overlay area further to the RNNZ upper terrace further to the north-west of the existing nominated location.[159]

5.6.28 I support Mr. Barnes' request that the ODP text is amended from the general reference to the size of the Neighbourhood Parks to be determined at the time of subdivision to the more definitive prescription of the 3,000m^2 size. This amendment is required to maintain consistency with Council's reserves management policies.[160]

5.6.29 Consequently, I recommend the following amendments to the PPC23 ODP:

a. Amend item b. of the ODP narrative in 8.10.31D DEVELOPMENT REQUIREMENTS - 2. OPEN SPACE, RECREATION AND COMMUNITY FACILITIES to specify the approximate 3,000m^2 size of the three Neighbourhood Parks.

5.6.30 These proposed amendments are evaluated in Appendix 2 and recorded in the schedule of amendments in Appendix 3.

5.6.31 Mr. Barnes also recommends additional ODP narrative to record that decisions on whether the *"Rural Open Space and Marginal Zone"* and *"Open Space Margins Zone"* ODP overlays are vested

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[154] CCC 1st Request for further information – Item 19), pg.6 June 2025 - https://ccc.govt.nz.

[155] Evidence of Mr. Barnes, Appendix 10, para. 27 & 29, pg. 4.

[156] PPC23 Section 32 Report – 3.6 Open Space and Reserves, pg.13, dated September 2025.

[157] PPC23 Section 32 Report – 3.6 Open Space and Reserves, pg.14, dated September 2025.

[158] Including for example, Chapter 8 Subdivision, Development and Earthworks general matter 8.7.4.6 Natural and cultural values.

[159] Evidence of Mr. Barnes, Appendix 10, para. 28, pg.4.

[160] Evidence of Mr. Barnes, Appendix 10, para. 29, pg.4.

in Council will be determined at the subdivision stage. However, establishing the size and location of Neighbourhood Parks and other land to vest in Council as part of any residential development is typically determined through the subdivision process as part of the post consent approval process. Therefore, I do not consider it is necessary to reference this standard process in the PPC23 ODP.

5.6.32 I acknowledge that some submitters consider there is inadequate provision made for Neighbourhood Parks and that there needs to be significantly larger areas across the site for open space to protect the existing natural values associated with the lower terrace and Pūharakekenui-Styx River margin. However, I support Mr. Barnes' conclusion that the provision that is provided for in the PPC23 ODP is consistent with Council's Parks and Reserves policies and Levels of Service requirements. It also meets the balance between providing future residents with access to recreation opportunities, while ensuring the costs of maintaining these spaces on an ongoing basis are reasonable on rate payers.

Analysis – Land development and nuisance effects

5.6.33 Several submissions oppose PPC23 because the additional population and land development works will generate nuisance effects that will compromise amenity and natural habitats, including through dust, vibration and light spill.

5.6.34 I consider that the CDP includes appropriate provisions to reduce nuisance effects by prescribing noise limits and controlling light spill and construction phase earthworks. It is also standard practice for Council to prescribe conditions on resource consents requiring development works to comply with approved Earthworks Management Plans and Stormwater Management Plans.[161] While the submitters raise valid resource management issues, I consider that the appropriate time to address these concerns is when the necessary resource consents are sought to develop the RNNZ, should PPC23 be approved. In my view it is not necessary to require any additional provisions to be included in the ODP or other CPD provisions to avoid, remedy or mitigate potential nuisance effects associated with the future land development works. Consequently, I recommend that the related submissions are rejected.

5.6.35 Several submissions identify concerns with the impacts of the development that PPC23 would enable on the stormwater system and how this may be compromised by the extent of fill that is likely to be required to manage the natural hazard risks associated with the site. I support Mr. Norton's evidence that stormwater may be able to be effectively managed with the provision of supplementary assessments, the acceptance of the recommended changes to the PPC23 ODP and any additional requirements to effectively mitigate adverse effects. In any event, there are processes that would need to be followed and resource consents that would need to be granted and implemented to effectively manage construction phase stormwater should PPC23 be approved.

[161] Including for example, Chapter 6 General Rules and Procedures, including 6.1 Noise and 6.3 Outdoor lighting, Chapter 8 Subdivision, Development and Earthworks general matters 8.7.4.5 Open spaces, reserves and recreation, 8.9 Rules – Earthworks and 8.9 Matters of discretion and Chapter 14 Residential rules 14.12 Rules - RNNZ.

5.6.36 I support Dr. Shadbolt's evidence that the biodiversity and habitats along the Pūharakekenui-Styx River and wider area are unlikely to be compromised by the development that would be enabled by PPC23, which includes the nuisance effects identified in the submissions.[162] Consequently, I recommend that the opposing submissions are rejected.

5.6.37 I do not consider it is necessary or appropriate to require the Proponent to commission public health assessments to inform the rezoning. I am satisfied that the existing CDP provisions and other RMA processes are sufficient to recognise and protect public health through the land use and subdivision consenting processes. Consequently, I recommend that the related submission is rejected.

Analysis – Community facilities

5.6.38 There is contrasting relief sought in submissions on the impacts the additional people in the area would have on Ōuruhia Model School. While I acknowledge the concerns identified by residents, I consider that the rezoning would have the benefit of providing a more stable role that would assist in ensuring the long-term viability of the school that is an asset to the local community. This position is substantiated by the submission from the Ōuruhia Model School. Consequently, I recommend that the submissions that oppose PPC23 because it would compromise the daily operation of Ōuruhia Model School are rejected.

5.6.39 I consider that PPC23 will provide some additional local amenities in the form of improved access to the Pūharakekenui-Styx River, Neighbourhood Parks and a Neighbourhood Centre. The increased population would also increase the rating base that would make it more viable to improve the local amenities and facilities in the area. Examples include the Spencerville Community Hub and wider reserves network along the Pūharakekenui-Styx River, adjacent to Brooklands Lagoon and facilities in Spencer Park. The development and increased local population may also benefit some of the local amenity-based activities, such as horse trekking, Everglades Country Golf Club and the Adrenalin forest. Therefore, I recommend that the submissions that oppose PPC23 because it would compromise the operation of local amenities are rejected.

5.6.40 I also accept Mr. Yeoman's economic evidence that the PPC23 Neighbourhood Centre is unlikely to be of a size that is viable to support a wider range of services, such as a local medical centre, service station or pharmacy. Therefore, I recommend that the submissions seeking an increase in the size of the Neighbourhood Centre are rejected.

Recommendations – Infrastructure, land development and nuisance effects

5.6.41 On the basis of the above evaluations and as recorded in Appendix 4, I recommend that the submissions received on infrastructure and land development effects are accepted, accepted in part, or rejected.

[162] Evidence of Dr. Shadbolt, Appendix 13, para.48, pg.9.

5.7 TRANSPORT NETWORK SAFETY, EFFICIENCY AND ACCESSIBILITY

5.7.1 Rezoning requests can contribute to relatively significant changes to the safety, efficiency and convenience of transportation networks through increased demand and changes in travel modes that may require network upgrades and improvements. The ability for future residents to access their needs through public and active networks and the extent to which the proposal reduces greenhouse gas emissions are also important determinants of whether PPC23 will contribute to a *"well-functioning urban environment."*

PPC23 – Transport network safety, efficiency and accessibility

5.7.2 The request and associated Section 32 evaluation confirm that no changes are sought to the CDP Chapter 7 Transport provisions, outlines the network upgrades proposed and describes the ODP movement networks.[163] This is supported by an ITA prepared by Novogroup that concludes the rezoning is appropriate from a transportation perspective subject to the proposed access arrangements, off-site road upgrades and transport mode options being implemented.[164] The Proponent did not amend the ITA to include an evaluation of the rezonings consistency with the objectives and policies of the CRPS and several transport plans in response to the initial request for further information.[165] This was on the basis that the site is subject to an existing urban zone and there are no adverse transport effects.[166] The DC-M Urban Design Assessment and Graphics Package provide the rationale for the ODP accessibility and the movement networks, including within the site and to local destinations.[167]

Submissions received – Transport network safety, efficiency and accessibility

5.7.3 Seventy-five (75) submission points cover transport network safety, efficiency and accessibility, which in summary cover:

a. Support PPC23 as it will improve the local road network through cycling connections that include onto Lower Styx Road and adjacent to the Pūharakekenui-Styx River and because it will increase the possibility of access to public transport.[168]

b. Support PPC23 in part where the ODP facilitates a safe active travel route to Ōuruhia Model School and the transport infrastructure development is staged.[169]

c. Hold a neutral position but identify that an ITA is required, that the developer needs to fund any network upgrades, conditions are applied to enhance cycle safety connectivity, birdlife is protected through speed limits and signage and access is provided to Lower Styx Road.

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[163] PPC23 Section 32 Report –3.5 Transport attributes, pg.13, September 2025.

[164] PPC23 Novogroup, Appendix E Integrated Transport Assessment dated April 2025.

[165] CCC 1st Request for further information – Item 6), 11 June 2025 - https://ccc.govt.nz/.

[166] PPC23 1st Request for further information response – Item 6), pg.2, 7 July 2025 - https://ccc.govt.nz/.

[167] PPC23 DC-M, Appendix G Urban Design Assessment dated 25 July 2025 and Appendix F (i) Landscape Graphics, updated 26 August 2025.

[168] S07.1 D & K Casey and S25.1 SLLT.

[169] S59.2 & S59.4 ŌMS.

Confirmation that the rezoning is consistent with NPS-UD Policy 8 in respect to *"out of sequence"* development and the extent to which PPC23 contributes to a *"well-functioning urban environment"* is also requested.[170]

d. Oppose PPC23 because the increased vehicle movements will compromise safety, increase congestion and generate nuisance effects, and the absence of footpaths and public transport. Additional concerns include compromised safety along Styx Road and the Turners Road and Marshland Road and Marshland Road and Spencerville Road intersections, the absence of railway barriers and limited visibility at the Chaney's Road crossing, increased carbon and greenhouse gas emissions and delays during tsunami evacuation events that could compromise human safety.[171] More specifically, one submission point requests that the CDP and PPC23 ODP are amended to include an internal 'collector loop' to support public transport and an extended pedestrian cycle link to Ōuruhia Model School, Bottle Lake Forest, and the Prestons suburb.[172]

e. Alternate relief that includes reinstating the Lower Styx Road bridge and Turners Road pathway, managing the number of vehicles using the Lower Styx Road bridge, deficiencies in the ITA are addressed, tsunami evacuation time modelling is completed, significant safety upgrades to Spencerville Road and Lower Styx Road and funded, the shared pathway is redesigned along Spencerville Road and Lower Styx Road and the adverse effects identified in the primary submissions are mitigated.[173]

Analysis – Transport network safety and efficiency

5.7.4 A peer review of the Novogroup ITA has been completed by Mr. David Smith, Technical Director – Transportation Planning at Abley Consultants that is in Appendix 11 of this Report.

5.7.5 Mr. Smith has drawn the following conclusions on the impact PPC23 may have on transport network safety and efficiency:[174]

a. Additional assessments are required to address the safety and efficiency effects, which include:

[170] S18.1 Z Duan, S25.10 SLLT, S33.2 K & L Wells, S46.1 A Hicks and S69.4 ECan.

[171] S01.1 J Dutkiewicz, S02.1 S Blackler, S03.2 I Blackler, S04.1 R Watson *(FS01 T Wells – Support)*, S06.1 S & K Baker, S09.1 M Pierce, S10.1 D Miller, S11.1 K Foot, S14.1 SRA, S15.1 K Van de Loo, S16.1 C Howison, S17.1 T Wilson, S19.1 M van Valkenburg, S21.1 C Mitchell, S22.1 D Elkington, S23.1 R Howison *(FS02 H & G Nimmo – Support)*, S24.1 D Lowe, S26.1 C Wakelin, S27.1 A Smirnoff, S28.1 D Parker, S29.1 M Stewart, S30.1 L Bennett, S31.1 Angela *(FS01 T Wells – Support)*, S32.1 C Elkington, S34.1 D Ling *(FS01 T Wells – Support)*, S35.1 R Ennor, S36.1 H King, S37.1 M Skelly, S39.1 A Te Ohaere-Fox, S41.1 M Gilmore, S42.1 J Knight *(FS01 T Wells – Support)*, S44.1 V Knowles, S45.1 D Knight *(FS01 T Wells – Support)*, S47.1 J Burney, S48.1 B Uren, S49.1 N Hough, S51.1 G Lowe, S54.1 J Lowe, S55.1 MWFT, S57.1 J Hawkins, S62.1 A McKenzie, S63.1 J Burns, S65.1 C Faithfull, S66.1 D English, S67.1 D Gilmore, S68.1 L Maurice, S70.1 ŌRG *(FS01 T Wells & FS03 R Muschamp - Support)*, S71.1 K & A Buxton, S72.1 P Hargreaves, 73.1 T Watson-Wells, S74.1 M Wells, and S75.1 J Messerly *(FS01 T Wells & FS02 H & G Nimmo – Support)*.

[172] S71.5 K & A Buxton.

[173] S04.2 R Watson, S24.2 D Lowe, S29.2 M Stewart, S46.1, 46.3 & 46.4 A Hicks, S71.5 K & A Buxton, S73.2 T Watson-Wells and S75.2 J Messerly *(FS01 T Wells & FS02 H & G Nimmo – Support)*.

[174] Evidence of Mr. Smith, Appendix 11, para. 85, pg. 25 & 26.

i. Completing a safety assessment along the Spencerville Road corridor that includes the intersections with Marshland Road and Main North Road to identify any additional mitigation required to offset the increased road safety risks arising from PPC23.

ii. Completing Sidra intersection modelling of the Marshland Road, Main North Road and Spencerville Road intersection to determine if additional upgrades are required.

iii. Establishing the appropriateness of a direct vehicular connection to Lower Styx Road from the PPC23 site, which has the potential to change travel patterns and reduce traffic volumes in the vicinity of the Ōuruhia Model School.

iv. Assessing the extent the proposed interface treatments along the northern property boundary will impede sight distances for vehicles exiting the northern access point, and to vest this land as road reserve if required.

b. Mr. Smith recommends the following changes to the PPC23 ODP plan and narrative to address the identified adverse impacts on transport network safety and efficiency:

i. Amend the ODP narrative to require that Turners Road from Spencerville Road to Marshland Road is upgraded to a 6.0m wide carriageway and 0.5m sealed shoulders and to require that Teapes Road is upgraded to a 5.5m wide carriageway with 0.5m sealed shoulders.

ii. Add ODP narrative to require that the Turners Road and Teapes Road intersection upgrade includes squaring up the intersection.

iii. Add ODP narrative to require that any land at the Turners Road and Spencerville Road intersection that is required for sight line improvements to the east along Spencerville Road is vested in Council.

iv. Amend the ODP narrative to require a Level Crossing Safety Impact Assessment (**LCSIA**) to be undertaken in line with Kiwirail guidance on the Spencerville Road level crossing to the west of the site, and any improvements identified in the LCSIA, such as the installation of barrier arms, are completed prior to any occupation of the PPC23 site.

5.7.6 Mr. Smith states that he is unable to support PPC23 until the information outlined above is provided and the suggested amendments to the ODP are accepted by the Proponent to mitigate the identified adverse traffic safety and efficiency effects. I support Mr. Smith's conclusion and consider that the additional assessments and the ODP amendments are critical to determining the impact of PPC23 on the safety and efficiency of the transportation network. The provision of the road corridor safety assessment and intersection modelling will assist in establishing the network upgrades that are required to maintain transport safety and efficiency and ensuring that any associated network improvements are funded by the land developer.

5.7.7 These proposed ODP amendments are evaluated in Appendix 2 and recorded in the schedule of amendments in Appendix 3.

5.7.8 I recommend the submissions that oppose PPC23 because it could compromise transport safety and efficiency are accepted unless the Proponent provides the listed information and the recommended ODP amendments are made. This is on the basis that PPC23 as notified could compromise transport safety and give rise to adverse effects relating to traffic congestion. There has also been no assessment of the benefits of providing direct access to Lower Styx Road and addressing risks associated with the increasing vehicle movements traversing the Chaney's Road railway line crossing. Mr. Smith's evidence and my acceptance of it supports the alternate relief sought through submissions that the ITA is deficient and is required to be updated to ensure the effects of the rezoning on the transport network are established and can be mitigated.

5.7.9 I support Mr. Smith's conclusion that the additional traffic movements would likely increase the risk to horse riders and that the carriageway improvements are likely to reduce the berm widths but that the New Zealand Road Code manages driver behaviour. However, I also accept that there are options available to address these safety concerns, including signage highlighting the presence of people, horse riders and wildlife, the recommended transport network improvements and changes to the speed limit thresholds. Consequently, I recommend the relief sought in submissions on these matters are accepted in part.

5.7.10 I accept Mr. Smith's analysis of the risks associated with delays that could occur during a tsunami event and his conclusion that there is sufficient capacity to ensure traffic heading inland will be able to make a timely evacuation. Mr Smith relies on Council's evacuation zone classifications and a prior event scenario assessed by Council in relation to a Hikurangi Subduction zone event. I agree with Mr. Smith that it would be unlikely that residents and visitors would travel east over the Spencerville Road one-lane bridge. I note that Mr. Norton has recommended that the future roads are designed to ensure safe egress and movements during natural hazard events, which I have recommend is included as an ODP requirement. This includes requiring internal roads and intersections with existing roads are built up to a predicted flood depth. Therefore, I recommend the submissions in respect to this matter are accepted in part.

Analysis – Transport network accessibility

5.7.11 A peer review of the Novogroup ITA has been completed by Mr. David Smith, Technical Director – Transportation Planning at Abley Consultants that is in Appendix 11 of this Report. Ms. Schröder's urban design evidence that is in Appendix 5 evaluates the appropriateness of the movement network and accessibility contained in the DC-M Urban Design Assessment, graphics package and the PPC23 ODP.

5.7.12 Mr. Smith makes the following conclusions on the accessibility of the PPC23 site and appropriateness of the associated movement network.[175]

a. A rezoning of this scale would typically include an assessment to establish the accessibility to essential services for the development. Mr. Smith recommends that this is addressed by the

[175] Evidence of Mr. Smith, Appendix 11, para. 85, pg. 25 & 26.

Proponent through the provision of a multi-modal accessibility assessment for the full PPC23 site consistent with Council ITA guidelines.

b. The following recommended changes to the PPC23 ODP plan and narrative are required to support a connected urban development (refer to Figure 3 of Mr. Smith's evidence[176]):

   i. Amend the ODP plan and narrative to provide a direct pedestrian and cycle corridor connecting the site between Teapes Road and Ōuruhia Model School via Turners Road.

   ii. Amend the ODP plan and add further requirements in the ODP narrative to provide a pedestrian and cycle corridor along Spencerville Road to connect the site to the intersection of Lower Styx Road and Spencerville Road.

   iii. Consider a road link from the site to Lower Styx Road.[177]

5.7.13 Mr. Smith states that he is unable to support PPC23 until the information outlined above and listed in paragraph 1.1.8 is provided and the suggested amendments to the ODP are made to enable an appropriate level of connectivity and accessibility.

5.7.14 Ms. Schröder also does not support PPC23 as notified because the PPC23 Urban Design Assessment overstates the accessibility benefits of the rezoning. The separation of the site to the Prestons subdivision to the south will contribute to an isolated car-dependent settlement that has limited accessibility, particularly for active transport mode and to public transport.[178]

5.7.15 Ms. Schröder identifies the following areas of concern that she considers are significant and need addressing in respect to the accessibility of the PPC23 site and the associated movement network.

a. The level and quality of accessibility for future residents to meet their everyday needs would not achieve desirable urban design outcomes unless a multi-modal accessibility assessment is completed and any findings incorporated to amendments to the PPC23.[179] This is required because PPC23 is proposing a new settlement that is isolated from Ōtautahi Christchurch.[180]

a. The level of connectivity and quality of the movement network provided within the site, including the availability of walking and cycle options and access to local reserves, does not support accessibility and active transport modes.[181]

b. The following recommended changes to the PPC23 ODP plan and narrative are required to support a more connected and accessible urban environment (refer to Figure 1 of Ms. Schröders evidence[182]):[183]

[176] Evidence of Mr. Smith, Appendix 11, Figure 3, pg.11.

[177] Evidence of Mr. Smith, Appendix 11, para. 5. (c), pg. 2.

[178] Evidence of Ms. Schröder, Appendix 5, para. 121 (a), pg. 36.

[179] Evidence of Ms. Schröder, Appendix 5, para. 8 (a), pg. 4.

[180] Evidence of Ms. Schröder, Appendix 5, para. 10, pg. 6.

[181] Evidence of Ms. Schröder, Appendix 5, para. 8 (d), pg. 4.

[182] Evidence of Ms. Schröder, Appendix 5, Appendix ii, pg. 40.

[183] Evidence of Ms. Schröder, Appendix 5, para. 9, pg. 4 & 5, and para.73 to 87, pg.25 to 28.

i. Three additional pedestrian and cycling connections from the site to Turners Road and Spencerville Road from the Collector Road near the Teapes Road intersection to the Pūharakekenui-Styx River riparian margin.

ii. A more direct path from the Neighbourhood Centre to the reserves within the site.

iii. A more direct path from the site to Ōuruhia Model School, which is also recommended by Mr. Smith and detailed in the amendments listed paragraph 5.7.12 b. i.).

iv. A pedestrian and cycling connection to Spencerville, which is also recommended by Mr. Smith and detailed in the amendments listed paragraph 5.7.12 b. ii.).

v. A road connection to Lower Styx Road, which Mr. Smith recommends is assessed in more detail to understand the transport merits of such a connection (refer to paragraph 5.7.12 b. iii. above).

5.7.16 I support Mr. Smith and Ms. Schröder's[184] evidence and the relief sought in submissions that a multi-modal accessibility assessment is required to be provided by the Proponent and any associated findings recorded through amendments to the PPC23 ODP. This assessment is also required to establish the appropriateness of a more direct and safe active travel route to Ōuruhia Model School via Turners Road, a pedestrian and cycling connection to Spencerville and additional access points to enhance walking and cycling connectivity. I consider that these actions are critical to establishing appropriate methods for supporting transport modal shift as well as going some way to responding to the absence of ready access to public transport.

5.7.17 These proposed ODP amendments are evaluated in Appendix 2 and recorded in the schedule of amendments in Appendix 3.

5.7.18 I support Mr. Smith and Ms. Schröder's conclusions that there are opportunities through the recommended amendments to the PPC23 ODP to reduce the reliance on private motor vehicles and the greenhouse gas emissions associated with their operation through the provision of improved accessibility to promote modal shift.[185] This includes supplementing the walking and cycling connection along Lower Styx Road to the Prestons subdivision that is serviced by public transport.[186] I accept with Mr. Smith's evidence that the roading network identified in the PPC23 ODP is designed to accommodate public transport services should ECan extend bus services to Spencerville and the site in the future. However, I agree with Ms. Schröder's opinion that the reliance on the pedestrian and cycling connection along Lower Styx Road to the Prestons subdivision in advance of the local bus network extending further north to service the Ōuruhia

[184] Evidence of Ms. Schröder, Appendix 5, para. 41 (d), pg. 16.

[185] Evidence of Mr. Smith, Appendix 11, para. 71, pg. 21 and para. 83, pg. 25 and evidence of Ms. Schröder, Appendix 5, para. 9, pg. 4 & 5, and para.73 to 87, pg.26 to 29.

[186] Evidence of Mr. Smith, Appendix 11, para. 26, pg. 10 and enabled by PPC23 ODP 8.10.31.D Development Requirements, 2. Open Space, Recreation and Community Facilities, Item i.

community will limit public transport as an option for some people (refer to paragraph 6.3.10 below).[187]

5.7.19 I also accept the evidence that the provision of a Neighbourhood Centre will reduce some vehicle trips where residents and visitors would otherwise have to travel to commercial offerings nearby. Consequently, I recommend the relief of submitters that wider network improvements beyond those identified in the PPC23 ODP and the amendments to it that have been recommended by Mr. Smith and Ms. Schröder are rejected.

5.7.20 I consider that the requirement for the Proponent to provide and implement a multi-modal accessibility assessment and to amend the ODP are critical to PPC23 satisfying the NPS-UD *"well-functioning urban environment"* tests. These include enabling urban areas that are well-serviced by existing or planned public transport and have good accessibility for all people, while supporting reduced greenhouse gas emissions.[188] On the basis of the transport and urban design evidence, I do not consider that PPC23 as notified satisfies these tests. Consequently, I recommend the submissions that oppose PPC23 on the grounds that the rezoning of an isolated site with low levels of connectivity will fail to promote a *"well-functioning urban environment"* are accepted.

Recommendations - Transport network safety, efficiency and accessibility

5.7.21 On the basis of the above evaluations and as recorded in Appendix 4, I recommend that the submissions received on transportation are accepted, accepted in part or rejected.

5.8 HUMAN HEALTH AND NATURAL HAZARD RISKS

5.8.1 It is important to determine that the land is suitable to develop and that the wellbeing of future occupiers and neighbours are protected from unreasonable natural hazard risks and the presence of any contaminated soil.

PPC23 – Human health and natural hazard risks

5.8.2 The request and associated Section 32 evaluation include an assessment of the risk of exposure to contaminated soils, the geotechnical ground conditions and natural hazards associated with the PPC23 site.[189] This is supported by a Preliminary Site Investigation (**PSI**) prepared by Sephira Environmental that establishes the likely presence of HAIL activities associated with the rural use of the site and the need for a Detailed Site Investigation (**DSI**).[190]

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[187] Evidence of Ms. Schröder, Appendix 5, para. 74, pg. 26.

[188] NPS-UD Objectives 1 and 3 (b), Policies 1 (c) & (d) and 8.

[189] PPC23 Section 32 Report – 4.3 Geotechnical Ground Conditions and Natural Hazards and 4.4 Contaminated Land, pg.18 to 20, September 2025.

[190] PPC23 Sephira Environmental, Appendix D Contamination, 5.0 Conclusions and Recommendations, pg.18 & 19, dated February 2025.

5.8.3 As detailed in Section 5.6.2, DL-S has prepared an Infrastructure Report[191] and supplementary Stormwater memo[192] in response to the request for further information that covers natural hazard risks and flooding. The PPC23 geotechnical investigation report prepared by Landtech Consulting identifies that liquefaction is the primary geotechnical hazard that can be remediated through land development and foundation design solutions.[193]

Submissions received – Human health and natural hazard Risks

5.8.4 Sixty-three (63) submission points cover human health and natural hazard risks, which in summary cover:

a. Take a neutral position but identify the potential presence of contaminated soil at 165 Turners Road.[194]

b. Oppose PPC23 as the site is subject to natural hazard risks, including flooding of the land from the Pūharakekenui--Styx River and drains during high rainfall and tsunami events, susceptibility to sea level rise and climate change, and liquefaction, lateral displacement and land instability during earthquake events. Several submitters record their personal experiences of flood events in the area.[195]

c. Seek an alternate relief that the natural hazard risks are mitigated, and the full suite of natural hazard risk assessments are provided, including geotechnical, tidal, hydrological and regional consenting feasibility assessments.[196] More specifically, one submitters requests that all Qualifying Matters are mapped and a full evaluation is completed to satisfy RMA section 77L that demonstrate the *"least modification necessary"* to MRDS and incorporate hazard infrastructure constraints in the zoning.[197]

d. Oppose PPC23 because of the risks associated with contaminated soil and radio frequency emissions from the Ōuruhia radio transmission tower and transmitting station that is described in paragraph 5.9.2 below.[198]

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[191] PPC23 DL-S, Appendix B Infrastructure Report, dated May 2025.

[192] PPC23 DL-S, Appendix B I Infrastructure Stormwater memo, dated 29 July2025.

[193] PPC23 Land Tech Consulting, Appendix C Geotechnical Investigation Report, 12.0 Conclusion, pg.18, dated 15 May 2025.

[194] S69.1 ECan.

[195] S09.1 M Pierce, S10.1 D Miller, S11.1 K Foot, S13.1 J Kennedy, S14.1 SRA, S15.1 K Van de Loo, S16.1 C Howison, S17.1 T Wilson, S19.1 M van Valkenburg, S20.1 D Riwaka, S21.1 C Mitchell, S22.1 D Elkington, S23.1 R Howison *(FS02 H & G Nimmo – Support)*, S24.1 D Lowe, S27.1 A Smirnoff, S28.1 D Parker, S30.1 L Bennett, S32.1 C Elkington, S35.1 R Ennor, S38.1 N Duxbury, S41.1 M Gilmore, S42.1 J Knight *(FS01 T Wells – Support)*, S45.1 D Knight *(FS01 T Wells – Support)*, S50.1 D McGarvey, S51.1 G Lowe, S54.1 J Lowe, S55.1 MWFT, S56.1 A Scott, S62.1 A McKenzie, S63.1 J Burns, S65.1 C Faithfull, S66.1 D English, S67.1 D Gilmore, S70.1 ŌRG *(FS01 T Wells & FS03 R Muschamp - Support)*, S72.1 P Hargreaves, 73.1 T Watson-Wells, S74.1 M Wells and S75.1 J Messerly *(FS01 T Wells & FS02 H & G Nimmo – Support)*.

[196] S24.2 D Lowe and S75.2 & 75.9 J Messerly.

[197] S75.3 J Messerly.

[198] S14.3 SRA, S19.1 M van Valkenburg, S22.1 D Elkington, S23.1 R Howison *(FS02 H & G Nimmo – Support)*, S30.1 L Bennett, S32.1 C Elkington, S63.1 J Burns, S70.1 ŌRG *(FS01 T Wells & FS03 R Muschamp - Support)* and S75.1 J Messerly *(FS01 T Wells & FS02 H & G Nimmo – Support).*

e. Seek an alternate relief that the full suite of contaminated land assessments is provided to identify and address the presence of any contaminated soil on the site.[199]

Analysis – Human health

5.8.5 Contaminated soils are managed under the NESCS. This applies to any subdivision or change in the use of a piece of land and therefore would apply to the type of land use change that would be facilitated by PPC23. As this is a request for a zone change, and not to determine the actual use of the site, the NESCS does not strictly apply.

5.8.6 The PSI prepared by Sephira Environmental establishes the possible presence of HAIL activities associated with the rural use of the site and the need for a DSI to determine whether the HAIL activities associated with the land rural uses have contaminated the soils. The PSI only covers a portion of the site as landowner permission to access 174 Spencerville Road, 21 Teapes Road and a portion of 144 Turners Road was not provided. Sephira Environmental have applied assumptions based on historic aerial imagery to identify the likely presence of HAIL activities and contaminants within these locations. These assumptions and the absence of a DSI present a risk to the Proponent that areas across the PPC23 may need to be remediated if contaminants are found to be above the industry standards, which can be an expensive exercise that influences the staging and viability of development.

5.8.7 However, I am mindful that the NESCS requires a DSI to be completed when the use of the land changes or the PPC23 site is proposed to be subdivided to establish the extent of any contaminants in the soil should the rezoning be approved. If contaminants are recorded above the minimum levels, then a NESCS consent will be required that may require a Remedial Action Plan or Site Validation Reports to remediate the site to the prescribed minimum standards. I consider that any risk to people's health and wellbeing can be effectively managed under the NESCS consenting regime. Therefore, I recommend the submissions that oppose PPC23 because it presents an unreasonable risk to human health through the exposure to contaminated soils are rejected.

5.8.8 I do not consider that the consented Ōuruhia transmission site and the radio frequency emissions associated with its operations present risks to human health. This is because the granted resource consents establish that the minimum radio frequency national standards were satisfied when consent was granted (refer to paragraph 5.9.2 below). In addition, I understand that the consent holder must continue to ensure the Ōuruhia transmission site complies with the minimum radio frequency standards in the National Environmental Standards for Telecommunication Facilities. I am also not aware of any CDP provisions that require resource consent for residential activities to establish in proximity to the Ōuruhia transmission site.[200]

[199] S14.3 SRA, S19.3 M van Valkenburg, S23.3 R Howison, S70.3 ŌRG and S75.9 J Messerly.

[200] Which contrasts with the Radiocommunication tower on Gebbie's Pass that is managed through activity standard 8.6.12 Communications.

5.8.9 Consequently, I recommend that the submissions that oppose PPC23 because it will increase the exposure of people to harmful radio frequency levels are rejected.

Analysis – Natural hazard risks

5.8.10 The PPC23 site is subject to several CDP Natural Hazard overlays, including the Fixed Minimum Floor Level Overlay within Flood Management Area, Flood Management Area, Flood Ponding Management Area, High Flood Hazard Management Area and Liquefaction Management Area.

5.8.11 Peer reviews of the geotechnical assessment prepared by Landtech Consulting and the DL-S Infrastructure Report and a Stormwater memo have been carried out by Mr. Brian Norton, Senior Stormwater Planning Engineer at Council that is in Appendix 9 and by Mr. Neil Charters, Principal Geotechnical Engineer at ENGEO that is in Appendix 12 of this Report.

5.8.12 Mr. Charters makes the following conclusions on the geotechnical natural hazard risks and the suitability of the site to support the development that would be enabled by PPC23:

a. The PPC23 site is subject to liquefaction hazard risks that are not substantially greater than other areas in Ōtautahi Christchurch and can likely be mitigated using standard geotechnical techniques.[201]

b. The Landtech geotechnical investigations are marginally acceptable when considered against the relevant guidance and further investigations would be needed to be provided as part of any future subdivision consent process should the rezoning be approved.[202]

c. Further consideration of the groundwater levels, ground conditions are required to substantiate the Landtech findings through the provision of supplementary geological engineering modelling, including for the slope that separates the upper and lower terraces, and how climate change and sea level rise may affect the groundwater levels.[203]

d. An assessment under the NPS-NH is required once this information is available.[204]

5.8.13 Mr. Charters' peer review highlights several apparent deficiencies with the Landtech geotechnical assessment that has been provided in support of PPC23. While some of these can be deferred until the consenting processes should the rezoning be approved, I support Mr. Charters' expert opinion that additional geological modelling is required to understand the stability of the site. I consider that this modelling is required to substantiate Landtech' s conclusions on the geotechnical suitability of the PPC23 site and to enable the mandatory risk matrix assessment required under the NPS-NH to be completed to inform the decision-making process.

5.8.14 I support Mr. Charters' position that this updated geotechnical analysis is required due to the potential substantial volumes of fill that may be required and excavations to install underground

[201] Evidence of Mr. Charters, Appendix 12, para. 4, pg. 1.

[202] Evidence of Mr. Charters, Appendix 12, para.16, pg. 3 & 4.

[203] Evidence of Mr. Charters, Appendix 12, para.17 to 22, pg. 3 & 4.

[204] Evidence of Mr. Charters, Appendix 12, para. 23, pg. 4.

services that include extensive stormwater treatment facilities, a water treatment plant and low-pressure sewer system.[205] I recommend the submissions opposing PPC23 because the site is subject to unconfirmed geotechnical hazards risks are accepted pending the Proponent completing the geotechnical modelling and NPS-NH risk matrix assessment to the satisfaction of the Hearing Commissioner.

5.8.15 Mr. Norton provides the following advice with respect to flood hazard risks associated with PPC23:

a. The PPC23 site is in a coastal area that experiences frequent flooding due to a legacy of poor historical development practices and land settlement exacerbated by the 2010 Canterbury Earthquake Sequence.[206]

b. The flood risks associated with the development enabled by PPC23 can be mitigated where additional information is provided by the Proponent and amendments to the ODP listed below are accepted.[207]

c. Stormwater is required to be managed within the Styx Catchment to comply with Council's stormwater network discharge consents to manage flood risks. The Proponent is encouraged to provide an addendum to the Infrastructure Servicing Report to establish how the future effects of elevated groundwater and SLR will be managed by the proposed stormwater facilities (refer to Section 5.6 Stormwater).

d. The NPS-NH requires an additional flood risk assessment that accounts for RSLR and VLM as Council's flood modelling only accounts for SLR. The study of vertical land movement is outside Mr. Norton's area of expertise so the Proponent is encouraged to provide a model with an appropriate RSLR factor from a suitably qualified and experienced coastal expert to satisfy the NPS-NH risk matrix assessment requirements.[208] This assessment should also identify methods for protecting the stormwater management facilities from groundwater intrusion with consideration of the projected groundwater increases associated with RSLR.[209]

e. The Proponent is requested to provide a tsunami risk assessment associated with the rezoning that is prepared by a suitably qualified and experienced expert to establish the related risks and they can be effectively mitigated.[210]

f. The PPC23 ODP narrative is amended to require that the minimum land levels take appropriate account of Council's Styx River Flood Model, comply with MfE guidelines and the minimum levels of internal roads and intersections are constructed to satisfy minimum flood levels.[211]

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[205] Evidence of Mr. Charters, Appendix 12, para. 27, pg.5 and para.31 (b, pg. 6.

[206] Evidence of Mr. Norton, Appendix 9, para. 20, pg. 3.

[207] Evidence of Mr. Norton, Appendix 9, para. 49, pg. 13.

[208] Evidence of Mr. Norton, Appendix 9, para. 35 to 38, pg. 6 & 7.

[209] Evidence of Mr. Norton, Appendix 9, para. 50, pg. 14.

[210] Evidence of Mr. Norton, Appendix 9, para. 42 to 44, pg. 9 to 12.

[211] Evidence of Mr. Norton, Appendix 9, para. 39 to 41, pg. 7.

5.8.16 On the basis of Mr. Norton's evidence, I consider that there is insufficient information to evaluate the flood and tsunami risks associated with the rezoning and that PPC23 as notified does not establish that natural hazard risks can be effectively mitigated. The Proponent is encouraged to provide these additional assessments as part of their evidence.

5.8.17 In lieu of these additional assessments, I recommend the following amendments to the PPC23 ODP to ensure the flood risks are effectively managed for any future consenting process should the rezoning be approved:

a. Add additional ODP narrative to require the filling of the future floodplain is effectively managed to ensure it includes compensatory storage to offset the loss of live flood storage, ensure the development will not displace ponded waters onto adjacent low-lying properties and ensure the flood volume of the High Hazard Management Area is not reduced.

b. Add additional ODP narrative to require that the minimum land levels for new development is based on the 1 in 200 year Max of Max flood prediction, a 1.2m SLR (2.88m NZVD) plus an appropriate factor of VLM and the finished flood level of new dwellings are set based on this peak water level plus 400mm of vertical freeboard.

c. Add the additional ODP narrative to ensure all internal roading, including the intersections with Spencerville or Turners Road, be built up to a predicted flooding depth that is no more than 150mm measured at the kerb in a 1 in 50 year event to allow for the safe ingress/egress of passenger vehicles in the event of an evacuation for flooding, tsunami or other natural disaster. This should also be extended to the future intersections with Teapes Road and Lower Styx Road should this additional road connection be supported.

5.8.18 These proposed amendments are evaluated in Appendix 2 and recorded in the schedule of amendments in Appendix 3.

5.8.19 I support Mr. Norton's conclusion that the flood risks associated with the development that would be enabled by PPC23 may be able to be mitigated, including through the provision of the additional assessment and ODP amendments. However, PPC23 as notified does not sufficiently address the concerns raised in the evidence that the natural hazard risks have been identified and mitigated. Consequently, I recommend that the submissions that oppose PPC23 pending the provision of additional evidence to establish and mitigate effects and establish consistency with the higher order instruments are accepted. I note that several submissions raise legitimate concerns with the management of stormwater and the associated impacts on flood risk, which were evaluated in Section 5.6 of this Report.

5.8.20 Mr. Norton identifies that subdivision within the Flood Ponding Management Area and High Flood Hazard Management Area Overlay triggers a non-complying resource consent.[212] I accept Mr. Norton's advice that the primary concern relates to the displacement of floodwaters onto other properties that would need to be determined at the time. I also understand that the only works that would be enabled by PPC23 within these portions of the site relate to the

[212] Evidence of Mr. Norton, Appendix 9, para. 25, pg.4.

naturalisation of existing drains and to form wetlands that should have a net benefit to the hydrological and ecological system.[213]

5.8.21 I recommend the submissions that seek the alternate relief that the Proponent prepare a suite of tidal, hydrological and regional consenting feasibility assessments are accepted in part. This is based on Mr. Norton's evidence that flood risks may be able to be effectively managed following the provision of the targeted assessments listed in paragraph 1.1.8 and the recording of any findings through amendments to the PPC23 ODP.

5.8.22 I recommend that the submission that the Qualifying Matters are mapped is also rejected as this has been provided in Appendix K of PPC23. I am also satisfied that the assessment of the appropriateness of applying the Qualifying Matters to the site, including the further requirements listed in section 77L, has been demonstrated by the Proponent in PPC23.[214]

Recommendations – Human health and natural hazard risks

5.8.23 On the basis of the above evaluations and as recorded in Appendix 4, I recommend that the submissions received on human health and natural hazard risks are accepted, accepted in part, or rejected.

5.9 REVERSE SENSITIVITY

5.9.1 Reverse sensitivity effects arise where a new or more sensitive activity locates near an existing lawfully established activity. Newly established activities can experience effects from the operation of the existing activity, such as noise, odour, dust, vibration, or spray drift, which can lead to pressure to constrain or curtail the established activity from continuing to operate.

5.9.2 The site context gives rise to the potential for the future occupants of the PPC23 site to generate adverse reverse sensitivity effects through complaints or actions that could compromise the legitimate operation of lawfully established rural activities and consented activities. The 137m high medium frequency radio transmission tower and transmitting station operate from 123 Lower Styx Road, which is approximately 155m west of the site across the Pūharakekenui-Styx River. The Ōuruhia transmission site was originally consented in 1980.[215] Several decisions have subsequently been granted to install additional facilities and to undertake post-earthquake repairs.[216]

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[213] PPC23 DL-S, Appendix B Infrastructure Report, 4. Stormwater, p.11, dated May 2025.

[214] PPC23 Section 32 Report 3.2 Qualifying Matters and the application of MDRS, pg. 11, PPC23 Whisper Creek CCC 2nd RFI .3 Qualifying Matters (QMs), pg. 2, and PPC23 Appendix N Application of MDRS, Chapman Tripp, 29 July 2026.

[215] RMA/1980/349 granted on 16 July 1980 and RMA/2021/2132 granted on 17 July 1980.

[216] RMA/1996/2633 granted 26 May 1997 to include FM frequencies; RMA/1997/1403 granted 7 July 1997 to change to conditions relating to the transmission mast; RMA/1999/3943 granted to undertake minor modifications to the mast and mount a tuning box and dish; RMA/2002/2377 granted 31 October 2002 to establish an emergency standby facility; RMA/2022/259 granted 19 April 2011 to operate a temporary transmission facility to enable maintenance to occur to the primary facility; RMA/20011/1184 granted 4 October 2011 for an extension of time to operate the temporary facility; and RMA/2012/1460 granted 9 October 2012 to operate the temporary facility until February 2013.

5.9.3 Rolling Meadows Limited has been granted consent to operate the Rolling Meadows Festival at 240 Lower Styx Road, which is to the south-west of the site.[217] The conditions of consent enable the festival to take place for a three-year period from 29 December to 1 January. Consent was granted on a non-notified basis without affected party approval as it was determined the effects will be less than minor where the conditions of consent are satisfied. This includes the requirement to manage noise and vehicles in accordance with approved noise and transport management plans.

PPC23 – Reverse sensitivity

5.9.4 The request and associated Section 32 evaluation provide an assessment of reverse sensitivity effects, including the site context and assessment of the rural activities operating in proximity to the site.[218] PPC23 as notified does not identify or assess the potential reverse sensitivity effects of the rezoning on the consented Ōuruhia transmission site or the Rolling Meadows Festival.

Submissions received – Reverse sensitivity

5.9.5 Eleven (11) submission points cover reverse sensitivity effects, which in summary:

a. Oppose PPC23 because the rezoning will give rise to adverse reverse sensitivity effects that could compromise rural productivity, including the existing farms, orchards and market gardens in the area.[219] One submission point considers that PPC23 will compromise the consented Rolling Meadows festival.[220]

Analysis – Reverse sensitivity

5.9.6 I support the conclusion in the PPC23 Section 32 report that it is commonplace for urban boundaries to adjoin the rural environment and agree that there are many examples throughout Ōtautahi Christchurch where this is evident.

5.9.7 I consider that any adverse reverse sensitivity effects arising from the future residents and any rural activities that continue on neighbouring properties to be negligible. This is because there are limited occasions where the site shares a direct boundary with neighbouring properties due to the separation provided by Spencerville Road to the north, Turners Road and Teapes Road to the east and the separation provided by the proposed RuUFZ, existing OWMZ, Pūharakekenui-Styx River and Lower Styx Road to the south. The PPC23 ODP also requires the rural interface treatments along the RNNZ boundary with Spencerville Road, Turners Road and Teapes Road to

[217] RMA/2025/1880 granted by Commissioner under delegated authority on 28 October 2025.

[218] PPC23 Section 32 Report – 4.9 Reverse sensitivity, pg.27, September 2025.

[219] S14.1 SRA, S19.1 M van Valkenburg, S23.1 R Howison *(FS02 H & G Nimmo – Support)*, S30.1 L Bennett, S32.1 C Elkington, S45.1 D Knight *(FS01 T Wells – Support)*, S63.1 J Burns, S67.1 D Gilmore, S68.1 L Maurice and S70.1 ŌRG *(FS01 T Wells & FS03 R Muschamp - Support)*.

[220] S60.1 Rolling Meadows.

be established and maintained that would provide a buffer as the activities transition from urban to rural.

5.9.8 The exception is the property at 18 Teapes Road that shares a north-western boundary with the site and the properties at 250 Spencerville Road and 266 Spencerville Road that share a north-eastern and eastern boundary with the site. The potential for adverse reverse sensitivity effects in relation to these properties is also considered negligible. This is because 18 Teapes Road is currently utilised for lifestyle rather than intensive rural activities. The PPC23 ODP also makes provision for non-residential activities (Urban Parks and Stormwater Basins, Rural Open Space and Recreation, and Open Space and Margins Zone overlay) along the boundary with this property.

5.9.9 266 Spencerville Road accommodates a residential unit and ancillary buildings that are adjacent to 250 Spencerville Road. Most of 266 Spencerville Road is used for dairy grazing and low intensive rural activities due to its low-lying nature and proximity to the Pūharakekenui-Styx River. There are also no obvious intensive farming operations, such as poultry or pig farms, or market gardens, in proximity to the site to generate adverse reverse sensitivity effects. The PPC23 ODP also makes provision for non-residential activities (Urban Parks and Stormwater Basins, Rural Open Space and Recreation, and Open Space and Margins Zone overlay) along the boundary with this property. 250 Spencerville Road accommodates a residential unit, but the property is too small to support intensive rural activities.

5.9.10 The only significant infrastructure operating near the PPC23 site is the Ōuruhia transmission site described in paragraph 5.9.2. As identified previously, this site is operating within the requirements of the granted consent conditions and the radio frequency emissions from the site need to satisfy the NES-TF and other industry-based engineering standards. I understand from a review of the consent decisions that radio frequency emissions do not present any risks to human health. While PPC23 would increase the amount of people residing near the facility, the Ōuruhia transmission site is a lawfully established activity that has been operating in the Ōuruhia area for a relatively long time. People will have the option to choose to live near the site should PPC23 be approved. The telecommunication provider has also not submitted to raise any specific concerns the rezoning could have on the Ōuruhia transmission site operations.

5.9.11 Any adverse reverse sensitivity effects associated with the operation of the Rolling Meadows Festival described in paragraph 5.9.3 are avoided through the need for the consent holder to operate the festival in accordance with the granted resource consent conditions. This will ensure that any adverse effects, including noise and vehicle parking, need to be managed. In addition, the significant separation provided by the Lower Styx Road, the Pūharakekenui-Styx River riparian margin, OWMZ and proposed RuUFZ from the proposed RNNZ also assists in reducing the risk that PPC23 could compromise the operation of the Rolling Meadows Festival.

5.9.12 Therefore, I recommend that the submissions opposing PPC23 because it will generate adverse reverse sensitivity effects are rejected.

Recommendations – Reverse sensitivity

5.9.13 On the basis of the above evaluations and as recorded in Appendix 4, I recommend that the submissions on reverse sensitivity are rejected.

5.10 NATURAL, CULTURAL AND HISTORIC SITES AND VALUES

PPC23 – Natural, cultural and historic sites and values

5.10.1 The request and associated Section 32 evaluation identify and assess the effects of the rezoning on the ecology and biodiversity of the site, which is supported by an ecology assessment prepared by Viridis Environmental Consultants.[221] Similarly, PPC23 identifies and assesses the presence of cultural values and sites of significance to Māori.[222] A preliminary Cultural Impact Assessment (**CIA**) is provided, albeit one that was prepared in 2022 as part of COVID 19 Recovery (Fast-track Consenting Act 2020) application and only covers the SPRZ portion of the site. Heritage values are briefly assessed as a component part of evaluating PPC's consistency with the CRPS and GSCP.[223]

Submissions received – Natural, cultural and historic sites and values

5.10.2 Sixty-seven (67) submission points cover natural values, and heritage sites and cultural values, which in summary:

a. Support PPC23 because PPC23 makes provision for an extensive riparian margin, public access and ecological restoration of the Pūharakekenui-Styx River.[224]

b. Hold a neutral position but request that PPC23 where the ODP facilitates place placed ecological learning.[225]

c. Hold a neutral position but request the rezoning is subject to a range of methods to protect and enhance the Pūharakekenui-Styx River and its margins, the establishment of development controls and mitigation, and provision of management plans and CRPS (Policy 9.3.1 and Appendix 3) assessment.[226]

d. Oppose PPC23 because the rezoning will compromise the natural and ecological values and habitats attributed to the site, the Pūharakekenui-Styx River and Brooklands Lagoon.[227]

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[221] PPC23 Section 32 Report – Section 4.7 Ecology, pg.23 & 24, and Appendices H and H (i).

[222] PPC23 Section 32 Report – Section 4.8 Cultural Values, pg.25 to 27, and Appendix I.

[223] PPC23 Section 32 Report –6.3 Spatial plans and strategies, pg.33 & 34 and Section 6.5 CRPS, pg.40.

[224] S25.1 SLLT and S58.1 D Tipple *(FS02 H&G Nimmo – Oppose)*.

[225] S59.3 ŌMS.

[226] S18.1 Z Duan, S25.2, S25.3, 25.10 & S25.11 SLLT and S69.1 ECan.

[227] 09.1 M Pierce, S14.1 SRA, S19.1 M van Valkenburg, S20.1 D Riwaka, S22.1 D Elkington, S23.1 R Howison *(FS02 H & G Nimmo – Support)*, S28.1 D Parker, S30.1 L Bennett, S31.1 Angela *(FS01 T Wells – Support)*, S32.1 C Elkington, S34.1 D Ling *(FS01 T Wells – Support)*, S35.1 R Ennor, S36.1 H King, S37.1 M Skelly, S40.1 N Neate, S41.1 M Gilmore, S42.1 K Knight, S49.1 N Hough, S51.1 G Lowe, S54.1 J Lowe, S55.1 MWFT, S57.1 J Hawkins, S63.1 J Burns, S65.1 C Faithfull, S68.1 L Maurice, S70.1 ŌRG *(FS01 T Wells*

e. Seek an alternate relief that identify the need several additional development controls and amendments to the ODP to mitigate effects of the rezoning on the natural and ecological values and habitats attributed to the site and the Pūharakekenui-Styx River.[228]

f. Oppose PPC23 because the rezoning will compromise cultural and historic values attributed to the site, including the traditional pathway between Ngāi Tuahuriri Pa to the sea.[229]

g. Seek an alternate relief that requests that an archaeological assessment and Cultural Impact Assessment (**CIA**) are provided and mana whenua are engaged.[230]

Analysis – Natural values

5.10.3 The Pūharakekenui-Styx River is a sensitive natural environment that is protected by the Site of Ecological Significance (LP23) CDP overlay and related provisions. This applies to the river and its riparian margin but extends into a small portion of the site. PPC23 proposes to retain the OWMZ that encompasses the portion of the site that is subject to the CDP overlay.

5.10.4 A peer review of the Viridis ecological assessment has been carried out by Dr. Antony Shadbolt, Team Leader Biodiversity at Council that is in Appendix 13 of this Report.

5.10.5 Dr. Shadbolt makes the following conclusions with respect to the impact the activities enabled by PPC23 are likely to have on the natural values that are attributed to the site and the Pūharakekenui-Styx River:[231]

a. The site contains wet grassland habitats and pastoral land that are frequented by seasonal bird species and includes habitats that are functionally connected to the wider Pūharakekenui–Styx River corridor and the Brooklands Lagoon environment.

b. The ODP requirements present opportunities for ecological restoration and enhancement, particularly along the river corridor and through the creation of wetlands and stormwater treatment areas.

c. The rezoning and subsequent consenting processes have the potential to deliver significant positive ecological outcomes for the site, while also offering options to mitigate the impact of the increase in people in the area on wildlife.

5.10.6 I support Dr. Shadbolt's conclusion that there are suitable habitats within the site that support a range of bird species despite the land being modified through historic farming activities.[232] Dr.

& FS03 R Muschamp - Support), S71.1 K & A Buxton, S72.1 I Hargeaves and S75.1 J Messerly *(FS01 T Wells & FS02 H & G Nimmo – Support)*.

[228] S46.1 A Hicks, and S75.3 J Messerly.

[229] S04.1 R Watson *(FS01 T Wells – Support)*, S14.1 SRA, S19.1 M van Valkenburg, S20.1 D Riwaka, S22.1 D Elkington, S23.1 R Howison *(FS02 H & G Nimmo – Support)*, S30.1 L Bennett, S41.1 M Gilmore, S57.1 J Hawkins, S63.1 J Burns, S70.1 ŌRG *(FS01 T Wells & FS03 R Muschamp - Support)*, S73.1 T Watson-Wells and S75.1 J Messerly *(FS01 T Wells & FS02 H & G Nimmo – Support)*.

[230] S14.2 SRA, S19.2 M van Valkenburg, S23.2 R Howison, S70.2 ŌRG *(FS01 T Wells & FS03 R Muschamp - Support)*, S73.4 T Watson-Wells and S75.5 & 75.10 J Messerly.

[231] Evidence of Dr. Shadbolt, Appendix 13, para. 46 to 49, pg. 8 & 9.

[232] Evidence of Dr. Shadbolt, Appendix 13, para. 18 to 28, pg. 5 & 6.

Shadbolt considers the subsidiary effects of the activities that PPC23 enables on these habitats, establishing that positive ecological outcomes for bird species and the wider area can be achieved through the ODP requirements and the establishment of more detailed design and ecological management approaches through the subsequent consenting process.[233] The PPC23 ODP also makes suitable provision to access the Pūharakekenui-Styx River from the site and from Teapes Road, Turners Road and Spencerville Road that isn't currently available. PPC23 would also enable the extension of the *"Source to Sea"* pathway. Therefore, I recommend that the submissions in support of PPC23 because it will facilitate access to the natural values attributed to this corridor are accepted. I also consider that this improved access and the ecological restoration that would be required to be undertaken would support place-based learning for ōuruhia Model School so recommend that this submission point is also accepted.

5.10.7 On the basis of Dr. Shadbolt's expert analysis, I do not consider it is necessary to include additional CDP provisions or amendments to the PPC23 ODP to mitigate the effects of the rezoning on the natural values and ecology of the site and adjoining environment. I recommend the submissions that oppose PPC23 on the grounds that the rezoning will compromise the natural and ecological values and habitats attributed to the site, the Pūharakekenui-Styx River and Brooklands Lagoon are rejected. This is because Dr. Shadbolt's evidence establishes that the ODP provides opportunities to enhance habitats within the site to support ecology, natural values and birdlife that would contribute to the natural values of the wider area. The width of the esplanade reserve would be determined through any subsequent subdivision, although the starting point is typically a minimum of 20m wide that is consistent with the relief sought by the submitter, which I recommend is accepted.

5.10.8 One submitter holds a neutral position on PPC23 but considers that the rezoning is inconsistent with CRPS Policy 9.3.1.[234] I consider that a key method for implementing the criteria for determining a Significant Natural Area listed in this CRPS policy are the objectives, policies, rules and methods of the CDP. The CDP has not identified the balance of the site that is not subject to the OWMZ to be a Site of Ecological Significance. Furthermore, there is no scope to consider the appropriateness of extending the current Site of Ecological Significance overlay beyond the Pūharakekenui-Styx River riparian margin through this process and there is no evidence to suggest such an exercise is warranted. Consequently, I recommend that this submission point is rejected.

Analysis – Cultural site and values

5.10.9 PPC23 establishes that the CDP and Mahaanui Iwi management Plan (**MIMP**) do not record any sites and areas of significance to Māori that Papatipu Rūnunga have sought to be protected in the CDP, including the Ngāi Wai (ID95) overlay that does not extend into the PPC23 site.[235] The absence of culturally significant sites is established in the 2022 preliminary CIA prepared by

[233] Evidence of Dr. Shadbolt, Appendix 13, para. 29 to 37, pg. 6 & 7.

[234] S69.1 ECan.

[235] CDP Chapter 9 Natural and Cultural Heritage - Appendix 9.5.7.3 – Map 1 of Schedule 9.5.6.4: Ngā Wai – Ōtautahi Christchurch Rivers and Streams – ID 79 to ID87 and ID 95.

Mahaanui Kurataiao Limited on behalf of Te Ngāi Tūāhuriri Rūnanga. I also note that the site has been subject to relatively significant modification from farming activities.

5.10.10 Te Ngāi Tūāhuriri Rūnanga have not taken the opportunity to lodge a submission on the request or to engage with the Proponent. There is also no scope to mandate Papatipu Rūnunga to participate in RMA processes. While this does not forgo the need to evaluate the likely presence of sites and areas of significance and the values attributed to them, it does indicate that there are no priority sites that mana whenua require to be protected in the CDP or through specific amendments to PPC23.

5.10.11 I support the Proponent's assessment of the cultural values attributed to the Pūharakekenui-Styx River and that the ODP, and the conclusions that the provisions in the CDP and within other planning instruments, will ensure that these will be protected if the rezoning is approved.[236] The PPC23 zoning pattern avoids urban development from establishing within the sensitive OMWZ portion of the site. The application of the RuUFZ and Qualifying Matters to the lower terrace also limits the amount of urban development that can occur within this sensitive area. The ODP requirement to establish the lineal active network across the OWMZ portion of the site appropriately recognises the traditional pathway between Ngāi Tūāhuriri Pa to the sea and enabling people to access it as part of the wider *"Source to Sea"* accessibility network.

5.10.12 The 2022 preliminary CIA includes several recommendations that include the effective management of stormwater and earthworks in proximity to the Pūharakekenui-Styx River. The balance of the CIA recommendations can be readily addressed through the standard RMA consenting process.[237] I acknowledge that Ms. Smetham and Ms. Schröder recommend the ODP is amended to record the need for any future development to adhere to the Ngāi Tahu Subdivision and Development Guidance. This is because the guidance includes relevant environmentally sustainable design principles that aren't already included in the CDP Subdivision matters of discretion. As recorded in paragraph 1.1.8 b. iii, I recommend that the Proponent addresses this matter in their evidence.

5.10.13 I acknowledge the concerns raised in submissions that the rezoning, and the land development it enables, could unearth culturally important artefacts. However, it is commonplace under RMA consenting processes to include conditions to ensure any artefacts that are discovered during the land development process are identified, the necessary authorities notified and actions taken to avoid, remedy or mitigate any related effects on cultural sites and values. I consider that these processes are sufficient to ensure that the discovery of middens and artefacts that may be of culture significance are protected should they be found as part of any future development works.

5.10.14 Consequently, I recommend that the submissions opposing PPC23 because it will compromise cultural site and areas of significance to Māori and the requirement for additional consultation with mana whenua has occurred are rejected.

[236] For example, Chapter 8 Subdivision, Development and Earthworks 8.7.4.6 Natural and Cultural Values general matters.

[237] Including adherence to the Ngāi Tahu Subdivision, Development Guidelines and ECan's Erosion and Sediment Control Guidelines, and sourcing local indigenous plant species.

Analysis – Historic sites and values

5.10.15 There are no relevant CPD Heritage Item or Setting overlays that apply to the site. It is also evident that the land has been subject to a relatively significant amount of modification. Consequently, I am satisfied there is no requirement for a site-specific heritage or archaeological assessment. As identified above, the PPC23 zoning pattern and ODP preclude intensive residential development from occurring within the lower terrace and Pūharakekenui-Styx River riparian margin and standard consenting discovery protocol conditions would also ensure that any artefacts unearthed during land development works are protected. Therefore, I recommend that the submissions opposing PPC23 because it will compromise historic sites and values are rejected.

Recommendations – Natural, cultural and historic sites and values

5.10.16 On the basis of the above evaluations and as recorded in Appendix 4, I recommend that the submissions received on natural, cultural and historical values are accepted, accepted in part, rejected or rejected.

5.11 PROPERTY AND SOCIAL WELLBEING

5.11.1 Several submissions identify a range of consequential effects that they attribute to PPC23, including negative impacts on property values, increases in rates, maintaining boundary trees and increased anti-social behaviour, and rezoning uninsurable land.

PPC23 – Property and social wellbeing

5.11.2 The request and associated section 32 evaluation do not address property rights or social wellbeing.

Submissions received – Property and social wellbeing

5.11.3 Thirty-two (32) submission points relate to private property rights and social wellbeing, which in summary cover:

a. Oppose PPC23 because the rezoning will negatively impact property values, increase rates to fund network upgrades and maintain facilities, is financially inequitable to existing landowners, the properties will be uninsurable, the rezoning will place pressure on unwilling sellers and will generate costs to maintain boundary trees and address effects where the proposed mitigation fails.[238]

[238] S09.1 M Pierce, S10.1 D Miller, S20.1 D Riwaka, S22.1 D Elkington, S24.1 D Lowe, S26.1 C Wakelin, S27.1 A Smirnoff, S28.1 D Parker, S29.1 M Stewart, S32.1 C Elkington, S34.1 D Ling *(FS01 T Wells – Support)*, S35.1 R Ennor, S38.1 N Duxbury, S41.1 M Gilmore, S42.1 J Knight *(FS01 T Wells – Support)*, S44.1 V Knowles, S54.1 J Lowe, S66.1 D English, S72.1 P Hargreaves and S75.1 J Messerly *(FS01 T Wells & FS02 H & G Nimmo – Support).*

b. Seek an alternate relief that any financial burden on property owners arising from the rezoning are mitigated and an independent peer review to establish that the future properties can be insured is provided.[239]

c. Oppose PPC23 because the development will generate anti-social behaviour, increase crime; and change community make-up, including in respect to litter and the operation of any future retail activities.[240]

Analysis – Property

5.11.4 There is no scope under the RMA to consider the effects of rezoning on property values, which are determined by private investment decisions made by willing sellers and willing buyers who will be influenced by a range of factors. Insurance is determined by public and private sector suppliers who apply risk-based assessments that include a broad range of factors that extend beyond the risk-based assessments required to be undertaken under the RMA. Any future landowners evaluating whether to purchase a section within the site if PPC23 is approved will need to make investment decisions based on due diligence and the best available information available at the time. This includes information recorded on records of title, Council Property Information Memorandum and whether the land and property can be insured.

5.11.5 Some submissions raise concerns about increased costs in maintaining boundary trees should PPC23 be approved. This is a civil matter between property owners that is administered through common law rights rather than the RMA. The site doesn't include any CDP Protected Vegetation or Significant Trees, which is typically the only circumstance where the RMA manages how boundary trees are maintained. For completeness, I consider that the site context limits the circumstances where this may be an issue if the rezoning is approved. This is because there are limited situations where the proposed RNNZ is directly adjacent to neighbouring properties, and where it does occur, the PPC23 zoning pattern and ODP make provision for appropriate boundary treatments, including the *"Rural Interface Treatment"*.

5.11.6 Similarly, any rates increase cannot be quantified through an RMA process as they are determined through the Local Government Act following a special consultative process to finalise Annual Plans and Long-Term Plans. Private developers are required to fund new facilities, upgrades and extensions to Council administered utilities and infrastructure, including through development contributions.

5.11.7 There may be longer term costs associated with establishing and maintaining the infrastructure required to service the PPC23 site. However, the funding mechanism for maintaining, replacing and improving these public assets and levels of service over time cannot be quantified or determined now. Any rate increases to improve levels of service would be distributed across an expanding rating base and will benefit the wider community. While I appreciate the anxiety

[239] S24.2 D Lowe and S75.7 J Messerly *(FS01 T Wells & FS02 H & G Nimmo – Support)*.

[240] S14.1 SRA, S16.1 C Howison, S19.1 M van Valkenburg, S22.1 D Elkington, S23.1 R Howison *(FS02 H & G Nimmo – Support)*, S30.1 L Bennett, S32.1 C Elkington, S36.1 H King, S62.1 A McKenzie, S63.1 J Burns and S70.1 ŌRG *(FS01 T Wells & FS03 R Muschamp - Support).*

expressed by the neighbouring landowners that PPC23 may have a negative impact on their property values and rates over time, I do not consider that it is appropriate to place any weight on these submissions for the reasons outlined above. Consequently, I recommend that the submissions that oppose PPC23 because of negative impacts on property values and the costs associated with maintaining them are rejected.

Analysis – Social wellbeing

5.11.8 Several submissions raise concerns that the rezoning and the local commercial centre that is enabled by it may attract undesirable retail activities and encourage anti-social behaviour. I have not placed weight on these submissions as they relate to effects that are subjective and based on an individual's perception of what constitutes socially appropriate behaviour. Any related effects cannot be determined now, and there are authorities with duties to respond to crime, littering or anti-social behaviour. This includes Council where by-laws have been breached and the New Zealand Police where laws have been broken. Consequently, I recommend that the submissions that oppose PPC23 because it may compromise social wellbeing are rejected and the submission in support because it will contribute to social wellbeing is accepted in part.

Recommendations – Property and social wellbeing

5.11.9 On the basis of the above evaluations and as recorded in Appendix 4, I recommend that the submissions received on property and social wellbeing are rejected or accepted in part.

6 STATUTORY AND OTHER INSTRUMENTS EVALUATION

6.1 PART 2 PURPOSE AND PRINCIPLES

6.1.1 Under section 74 (1)(b), any changes to the CDP must accord with Part 2 of the RMA. This sets out the purpose of the RMA (section 5), matters of national importance that must be recognised and provided for (section 6), other matters that *"particular regard"* is to be had to (section 7), and to take into account the principles of Te Tiriti o Waitangi (section 8).

6.1.2 I consider that the Purpose of the Act is currently reflected in the settled CDP objectives and policies, which PPC23 does not seek to change. Rather, PPC23 seeks to rezone the land to a combination of RNNZ and RuUFZ and to coordinate the subdivision and development of the site through the replacement ODP and the addition of a subdivision activity standard (8.6.11) and permitted activity standard (14.4.3.1.1) to apply the NCZ to the consenting of the proposed Neighbourhood Centre.

6.1.3 Establishing the appropriateness of the objective of PPC23 in achieving the purpose of the RMA is also a requirement under section 32, which is considered below.

6.1.4 In terms of the matters of national significance in section 6 of the RMA, I support the Proponents conclusion that PPC23 effectively protects the areas of significance identified with the Pūharakekenui-Styx River corridor and the species and habitats it supports (section 6 (c)) and enhances public access to its margins (section 6 (d)).[241] The site avoids impacting the coastal environment, any outstanding natural features and landscapes (section 6 (a) and (b)) and appropriate methods are available to protect any unknown sites of cultural or historic significance (section 6 (e) and (f)). The rezoning may be able to effectively manage natural hazard risks associated with flood, earthquake and tsunami events pending the Proponent providing the additional assessments to address Mr. Norton and Mr. Charters' concerns (section 6 (h)). However, in the absence of these additional assessments, I do not consider that PPC23 as notified has *"recognised and provided"* for the management of natural hazards to the extent necessary to achieve the purpose of the Act (section 5).

6.1.5 In terms of other matters set out in section 7 of the RMA, I consider that the efficient use and development of natural and physical resources (section 7 (b)), the maintenance and enhancement of amenity values (section 7 (c)), the maintenance and enhancement of the quality of the environment (section 7 (f)), recognise the finite characteristics of natural and physical resources (section 7 (g)), and the effects of climate change on natural hazard risk and transport resilience (section 7 (i)) are relevant to the consideration of PPC23.

6.1.6 As identified previously, additional technical assessments are required to substantiate and effectively mitigate the impacts of PPC23 on the RMA *"other matters"* that have been identified by Council's experts and recorded in paragraph 1.1.8. Consequently, and in the absence of these

[241] PPC23 Section 32 Report 8. Part 2 RMA and overall Conclusion, pg. 45 - https://ccc.govt.nz/.

additional assessments, I consider that PPC23 as notified is unable to deliver the outcomes prescribed in the Section 7 other matters to the extent necessary to achieve the Purpose of the Act (section 5).

6.1.7 I consider that Te tiriti o Waitangi has been *"taken into account"* in determining the appropriateness of the amendments to the CDP proposed by PPC23 (section 8).

6.2 FUNCTIONS OF TERRITORIAL AUTHORITIES

6.2.1 The functions of Council's are set out in section 31 of the RMA and include the establishment, implementation and review of objectives, policies, and methods to:

a. Achieve integrated management of the effects of the use, development and protection of land and associated natural and physical resources; and

b. Control any actual or potential effects of the use, development, or protection of land.

6.2.2 PPC23 and the ODP once amended in accordance with the recommendations in Appendix 3, in combination with the underlying CDP RNNZ, RuUFZ and OWMZ and the related provisions, may be able to achieve integrated management and all potential effects associated with the use, development and protection of the land can be effectively managed. This is contingent on the Proponent providing the additional technical assessments listed in paragraph 1.1.8 to the satisfaction of Council's experts and the Hearing Commissioner.

6.3 STATUTORY INSTRUMENTS

6.3.1 As noted previously in Section 4.1 of this Report, the CDP as amended by PPC23 must:

a. *"Give effect"* to any operative national policy statement (section 75 (3)(a)) and any regional policy statement (section 75 (3)(c)).

b. *"Have regard"* to any management plan or strategy prepared under other Acts (section 74 (2)(b)(i)).

c. *"Take into account"* any relevant planning document recognised by an iwi authority and lodged with the territorial authority, to the extent that its content has a bearing on the resource management issues of the district (section 74 (2A)).

d. *"Not be inconsistent"* with any regional plan (section 75 (4)(b).

6.3.2 The extent to which PPC23 satisfies these statutory tests in the context of changes to the CDP are evaluated further below.

National Policy Statement on Urban Development (NPS-UD)

6.3.3 I adopt the Proponent's summary of the NPS-UD and the relevant list of outcomes on the objectives and policies that must be achieved.[242] The NPS-UD lists several economic bottom-lines that must be satisfied to ensure housing and business capacity is enabled and supported by district plans. The NPS-UD also requires that overly restrictive barriers to these outcomes being achieved are removed. In this regard, I consider that the NPS-UD, aided by the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021, promotes residential and business development to support growing communities where the stated pre-requisites have been satisfied.

6.3.4 As recorded in Section 5.3, I agree that the SPRZ portion of the site is an *"urban environment"* but the balance four lots that are subject to the RuUFZ are *"rural"* for the purposes of applying responsive planning pathway (Policy 8).

6.3.5 The following evaluates whether these four rural properties satisfy the NPS-UD Policy 8 tests for urban development that is *"unanticipated"* by RMA planning documents and *"out of sequence"* with planned land release. It is common ground between the Proponent and I that these properties are not an *"Existing Urban Area"* or a *"Future Development Area"* in the CRPS Map A or as an *"Urban area", "Urban area recently zoned / consented" or "Future urban area"* in the GCSP.[243]

6.3.6 I accept Mr. Yeoman's economic evidence that the additional residential housing capacity that would be enabled by PPC23, inclusive of these four properties, is likely to be *"significant"* in the context of Policy 8, clause 3.8 (1) and Objective 6 (c).[244] As established by Mr. Yeoman, the land would be within a housing and labour market of 10,000 people. I also agree with the Proponent that there are no criteria prescribed in the CRPS for determining how Policy 8 is implemented (clause 3.8 (2)(c) and (3)).[245]

6.3.7 I accept Mr. Yeoman's economic evidence that PPC23 would provide some limited provision for homes within a 'greenfield' subdivision that will support housing choice as a contrast to the intensification occurring within Ōtautahi Christchurch's urban environment. This includes the provision of larger lots within the range enabled by the 15hh/ha requirements (Policy 1 (a)(i)). The PPC23 site is also likely to be closer to Ōtautahi Christchurch than other undeveloped plan-enabled residential 'greenfield' areas across the city and wider sub-region. I am also satisfied that the additional housing provision is likely to support the competitive operation of land and development markets (Objective 2 and Policy 1 (d)) and ensure there is sufficient development capacity to meet demand (Policies 2 and 7).

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[242] PPC23 Section 32 Report – Section 6.4 NPS-UD, pg.35 to 39.

[243] GCSP, The spatial strategy, Map 2, pg.22 – https://greaterchristchurch.org.nz.

[244] Evidence of Mr. Yeoman, Appendix 6, para.4. (c), pg.1 & 2.

[245] PPC23 Section 32 Report – Section 6.4 NPS-UD, pg.37.

6.3.8 I reiterate the need for the Proponent to provide the additional economic evidence listed in paragraph 1.1.8 to substantiate whether the rezoning would improve affordability (Objective 2) and there is high demand in the area relative to other locations in *"urban environment"* (Objective 3 (c)). I accept Mr. Yeoman's evidence that the provision of a Neighbourhood Centre will provide some limited commercial offerings to meet localised needs (Policy 1 (b)).

6.3.9 The remaining clause 3.8 threshold tests are whether the rezoning of these four properties will contribute to a *"well-functioning urban environment"* and are *"well-connected along transport corridors"* (clause 3.8 (2)(a) and (b). These apply to the wider PPC23 site and are inter-related as a component part of the Policy 1 requirement, as a minimum, that urban environments *"have good accessibility for all people between housing, jobs, community services, and natural spaces, including by way of public or active transport"* (Policy 1 (c)). This requires an assessment at the micro scale to establish whether the PPC23 ODP supports accessibility to facilities and amenities within the site and to the local destinations listed in the policy. It also requires an assessment at the macro scale to establish that the location can *"support reductions in greenhouse gas emissions"* (Policy 1 (e)) and is resilient to climate change (Policy 1 (f)) in the context of the relative reliance future residents may place on private motor vehicles to access their needs.

6.3.10 As outlined in Section 5.3 of this Report, I consider that the establishment of a settlement on the PPC23 site should it be approved would constitute a relatively isolated settlement. While this isn't unique in the context of Ōtautahi Christchurch, it is relevant to determining the levels of accessibility and car dependency that future residents are likely to face. The closest urban area to the site is Spencerville that is a minimum of 1.2km to the east[246] and the Prestons subdivision that is a minimum of 6km to the south[247] via the existing road networks. I accept that the ODP caters for future bus services and these may be extended to the site from the Prestons subdivision where the current service terminates. However, I support Mr. Smith and Ms. Schröder's evidence that the PPC23 ODP as notified does not effectively respond to this site context to the minimum level necessary to support accessibility.

6.3.11 The amendments to the ODP will also assist in reducing the barriers to accessing Spencerville, Ōuruhia Model School and the Pūharakekenui-Styx River via active travel modes. They will also provide safer and more convenient options for cycling to the Prestons subdivision, although the one-hour 14-minute walk is likely to deter people from choosing this option for their regular commute. The recommended amendments to the ODP in Appendix 3 will also improve the levels of accessibility. However, I consider that the multi-modal accessibility assessment listed in paragraph 1.1.8 and recording of any relevant findings into the PPC23 amendments are critical to establishing consistency with NPS-UD Objectives 1, and 3 (b), Policies 1 and 8 and clause 3.8 (2)(a) and (b).

[246] Google Maps – 240 Spencerville Road to 380 Lower Styx Road, 1.2km, 16 min walk and 1 minute drive via Spencerville Road – https://google.com/maps.

[247] Google Maps – 240 Spencerville Road to 149 Te Korari Street, 5.5km, 1 hour 14-minute walk and 6-minute drive via Spencerville Road and Lower Styx Road or via Turners Road and Marshland Road– https://google.com/maps.

6.3.12 The extent to which any rezoning of rural land for urban expansion will support reductions in greenhouse gas emissions is a relative measure. I consider that it is challenging for any future urban area that isn't within a metropolitan centre and close to significant public transport facilities to reduce emissions without a broad range of Government and regional policy interventions, market-based responses, and changes in individual choices.

6.3.13 I support the Proponent's position that the rezoning could support the critical mass needed to fund public transport options in the future, which would also be further assisted by wider network upgrades. However, I accept Ms. Schröder's evidence that the relative isolation of the site will inevitably result in a reliance on private motor vehicles to commute to other areas to enable future residents to access their everyday needs.[248] This could contribute to greenhouse gas emissions depending upon travel patterns and modal and vehicle choices. I also accept Mr. Smith's rationale for determining the likely vehicle emissions and his recommendation for the Proponent to prepare the multi-modal accessibility assessment listed in paragraph 1.1.8 to establish options for reducing the reliance on private motor vehicles.

6.3.14 Mr. Yeoman's economic evidence emphasises the need for the Proponent to provide the additional Economic assessment in paragraph 1.1.8 to substantiate the basis for relying on 'greenfield' residential development in Rolleston and Rangiora for determining the transport costs and benefits of PPC23. This will also clarify the premise relied on by the Proponent that there will be reduced vehicle emissions as the PPC23 site is closer to Ōtautahi Christchurch than Rangiora or Rolleston.

6.3.15 Objective 8 and Policy 1 (f) require that Aotearoa New Zealand's urban environments are resilient to the current and future effects of climate change. I accept Mr Charters and Mr. Norton's evidence that additional assessments are required to substantiate the extent to which the site would be resilient to natural hazard events and how these will be affected by climate change over time. I consider that the extent to which the rezoning is resilient to the effects of climate change turns on the Proponent providing the technical assessments listed in paragraph 1.1.8 and incorporating the findings of these assessments into the PPC23 ODP to supplement the recommended amendments in Appendix 3.

6.3.16 Having recommended that the additional assessments listed in paragraph 1.1.8 are required to establish whether rezoning constitutes a *"well-functioning urban environment"* is consistent with Objectives 1, and 8, Policies 1 (e) and (f) and 8 and clause 3.8 (2)(a), the following evaluates PPC23's consistency with the balance of the NPS-UD.

6.3.17 Objective 6 of the NPS-UD requires that urban environments are integrated with infrastructure planning and funding decisions. I accept Ms. McDonald's evidence that while the site is not currently serviced, there are acceptable options for extending and upgrading the water and wastewater connections to satisfy Council's standards to support an integrated network. The development of the PPC23 site should the rezoning be approved will require upgrades to the local transport network to maintain safety and efficiency and to support accessibility. I support the

[248] Evidence of Ms. Schröder, Appendix 5, para. 41 (b), pg. 16.

evidence that identifies the need for additional assessments listed in paragraph 1.1.8 and incorporating the findings of these assessments into the PPC23 ODP to supplement the recommended amendments in Appendix 3. This extends to the determining the geotechnical stability of the land and the ability to establish and operate integrated stormwater management facilities that are resilient to natural hazard risks and the effects of climate change.

6.3.18 In summary, I consider that PPC23 may be able to pass the pre-requisites for a *"well-functioning urban environment"* and the various responsive planning tests. However, this will turn on the Proponent providing the additional assessments listed in paragraph 1.1.8 and incorporating the findings of these assessments into the PPC23 ODP to supplement the recommended amendments in Appendix 3. Consequently, I am unable to establish whether PPC23 as notified is consistent with the objective and relevant policies of the NPS-UD. Therefore, I recommend that the neutral submission and those that oppose PPC23 because it is contrary to the NPS-UD are accepted.[249]

National Policy Statement on Natural Hazards (NPS-NH)

6.3.19 The NPS-NH came into effect in December 2025 following the close of submissions on PPC23. It requires decision-makers to assess and manage natural hazard risks in a consistent, risk-based and proportionate manner. The NPS-NH applies to flooding and geotechnical hazard risks based on the site context and the SDP overlays (NPS-NH clause 1.3).

6.3.20 Objective 1 directs that:

> *"Natural hazard risk to people and property associated with subdivision use and development is managed using a risk-based proportionate approach."*

6.3.21 The NPS-NH requires that the consideration of the natural hazard risks associated with the use or development of the site is assessed using the risk matrix (Policy 1, clause 3.2 and Appendix 1). The consequence and likelihood of the hazard risk determines whether *"very high natural hazard risks"* are avoided, and high or medium risk is avoided or mitigated proportionate to the level of risk (Policy 3 and clause 3.3). The creation or increase in a *"significant natural hazard risk"* on other sites are avoided or mitigated (Policy 4 and clause 3.3). The risk assessment and decisions must be based on the best available information, even when that information is uncertain or incomplete (Policy 5 and clause 3.4), and consider the potential impacts of climate change to at least 100 years into the future (Policy 6).

6.3.22 While Mr. Norton and Mr. Charters indicate that there may be engineering and design solutions to mitigate the identified natural hazard risks, these preliminary findings need to be substantiated by the additional technical assessments listed in paragraph 1.1.8, evaluated in Section 5.8 and established in Appendices 9 and 12 of this Report. Once completed, the Proponent is encouraged to prepare a risk matrix assessment to determine the level of consequence and likelihood of natural hazard risks and what amendments may be required to PPC23 to mitigate any related

[249] S69.4 ECan, S18.1 Z Duan and S75.1 J Messerly (FS01 T Wells and FS02 H & G Nimmo).

risks. Consequently, I am unable to establish whether PPC23 is consistent with the objective and relevant policies of the NPS-NH.

National Policy Statement for Infrastructure (NPS-I)

6.3.23 The NPS-I came into effect in December 2025 following the close of submissions of PPC23. It recognises the significant contribution infrastructure makes to urban development (Objective 1). The benefits of infrastructure need to be provided for and recognised by decision-makers, including the operational or functional need for infrastructure to be established in certain locations (Policies 1 and 2).

6.3.24 Consideration must be given to spatial plans (Policy 3). Decision makers also must enable the efficient and timely operation and delivery of infrastructure activities (Policy 4), recognise and provide for infrastructure supporting activities (Policy 5) and Māori interests (Policy 6). The effects of infrastructure (Policy 9) and the compatibility of land uses (Policies 10 and 11) also need to be considered and addressed.

6.3.25 I do not consider that approving PPC23 would compromise any strategically significant infrastructure identified in the GCSP as the infrastructure required to service the site is limited to small-scale localised network upgrades and extensions and on-site facilities (Policy 3). While the site is not currently provided with reticulated water and wastewater services, I accept Ms. McDonalds' evidence that there are suitable upgrades and extensions to enable these supplies to be connected to the public network. Suitable provision of Neighbourhood Parks has also been confirmed by Mr. Barnes and there are processes in place to ensure that utility services are provided in accordance with utility provider's requirements.

6.3.26 However, I support the expert evidence that requires amendments to the PPC23 ODP to ensure the site is accessible and does not compromise the safe and efficient operation of the transport network and stormwater is appropriately managed to ensure it is resilience to natural hazard events and the effects climate change. The provision of the additional assessments listed in paragraph 1.1.8 are required to substantiate the appropriateness of the accessibility network, transport safety and efficiency and integration of the stormwater management facilities with the hydrological systems. This includes assessments and evidence to establish that the infrastructure required to service the PPC23 site is not exposed to unacceptable natural hazard risks that cannot be mitigated (RMA section 6 (h) and NPS-I Policies 1, 2 and 4).

6.3.27 Consequently, I am unable to establish whether PPC23 is consistent with the objective and relevant policies of the NPS-I.

National Policy Statement on Highly Productive Land (NPS-HPL)

6.3.28 The NPS-HPL provides national direction on how highly productive land is protected from inappropriate subdivision and development. The NPS-HPL objective requires that highly productive land is protected for use in land-based primary production. These outcomes are supported by policies that recognise highly productive land as a finite resource that needs to be

managed in an integrated way (Policy 2). The *"urban rezoning"*[250] of highly productive land (Policy 5) and subdivision (Policy 7) are to be avoided except as provided in the NPS-HPL.

6.3.29 The NPS-HPL was amended by the National Policy Statement for Highly Productive Land Amendment 2025 on 18 December 2025. These amendments related to the timing for when regional councils map highly productive land, expand the quarrying and mineral extraction provisions and remove LUC Class 3 versatile soils as highly productive land. Therefore, the latest amendments are not specifically relevant to PPC23.

6.3.30 I consider that the SPRZ is specifically excluded from consideration under Policies 5 and 7 and clause 3.6 as the zone is a component part of the *"urban"* definition in the NPS-HPL[251], and hence would not constitute *"urban rezoning."*

6.3.31 The only portion of the RuUFZ balance of the PPC23 that contains LUC Class 1 or 2 versatile soils is the south-eastern corner of 176 Turners Road that contains LUC Class 2 versatile soils.[252] NPS-HPL clause 3.6 requires that Tier 1 and 2 territorial authorities can only allow the urban rezoning of highly productive land where it is required to meet housing demand (under the NPS-UD), there are no other reasonably practicable or feasible options to achieve a *"well-functioning urban environment"* and the benefits outweigh the costs associated with the loss of highly productive land.

6.3.32 This Report, together with the NPS-UD evaluation above, establish the need for further evidence to substantiate that PPC23 is required to provide sufficient development capacity to meet demand for housing, as set out in NPS-HPL clause 3.6. The Proponent has not demonstrated that there is insufficient capacity in either the short-medium term (10 years) or even the long term (30 years) to accommodate expected demand. Accordingly, there is no evidential basis to support the need for additional urban rezoning of highly productive land. Nor has a sufficiently robust assessment been provided to establish whether there are reasonably practicable alternatives or that the urban rezoning benefits outweigh the costs.

6.3.33 However, I do not consider this is necessary for the purposes of determining consistency of PPC23 with the NPS-HPL. This is because I agree with the Proponent that the size of the area of highly productive land makes it appropriate for rezoning under the circumstances as clause 3.4 (5)(d) of the NPS-HPL enables small discrete areas to be excluded from the mapping exercise. I consider that this would be practical given that the area of highly productive land within 176 Turners Road is small and because the balance of the RuUFZ portion of the site does not contain LUC Class 1 or 2 soils. This is supported by Mr. Yeoman's evidence where he identifies that the land area is small and may not be economically viable for farming, which indicates that the costs of the lost rural

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[250] NPS-HPL – 1.3 Interpretation, "***Urban rezoning*** *means changing from the general rural or rural production zone to an urban zone*", pg.6.

[251] NPS-HPL – 1.3 Interpretation, *"**Urban**, as a description of a zone, means any of the following zones: … (e) any specific purpose zone…"*, pg.6.

[252] PPC23 Section 32 Report – 6.1 NPS-HPL, Figure 6, pg. 30, dated September 2025.

production would likely be minimal, and that the benefits associated with the urban rezoning would likely outweigh those costs.

6.3.34 On the basis of the above assessment and available evidence, I consider that PPC23 is consistent with the NPS-HPL that the rezoning would not compromise the highly productive land resource in the area and wider Canterbury region. Therefore, I recommend that the submission that opposes PPC23 because it will remove highly productive land is rejected.[253]

National Policy Statement on Freshwater Management (NPS-FWM)

6.3.35 The NPS-FWM provides national directions that ensure that natural and physical resources are managed in a way that prioritises the health and well-being of water bodies and freshwater ecosystems, the health needs of people and the ability of people and communities to provide for the current and future well-being (Objective 1). It also introduces the concept of Te Mana o te Wai to reflect the need for land and water to be managed in an integrated way (clause 1.3).

6.3.36 The NPS-FWM was amended on 18 December 2025. These amendments were targeted to provide greater flexibility for quarrying and mineral extraction activities in relation to freshwater protections, including wetlands. Therefore, these amendments are not specifically relevant to PPC23.

6.3.37 I accept Dr. Shadbolt's expert evidence in Appendix 13 that the development works enabled by PPC23 would contribute to net ecological benefits through the naturalisation of local drains and the riparian margin. I also acknowledge the Proponents' conclusion that a suite of resource consents under the NPS-FWM, the related National Environmental Standards and LWRP rules will be required should PPC23 be approved.[254]

6.3.38 However, the provision of the additional assessments listed in paragraph 1.1.8 are required to substantiate the appropriateness of the stormwater management facilities, which include wetlands and stormwater basins, and how they will function when elevated groundwater is combined with SLR and any other mitigation established once the flood modelling has been completed. Consequently, I am unable to establish whether PPC23 is consistent with the objective and relevant policies of the NPS-FWM. Therefore, I recommend that the submission opposing PPC23 because it is contrary to the NPS-FWM are accepted.[255]

National Policy Statement for Indigenous Biodiversity (NPS-IB)

6.3.39 I adopt the Proponent's summary of the NPS-IB and the relevant list of outcomes the objectives and policies seek to achieve.[256] I understand that the amendments to the NPS-IB in December 2025 were targeted at making explicit provision for mineral extraction and quarrying, which isn't

[253] S71.1 K & A Buxton.

[254] PPC23 Section 32 Report – 6.2 NPS – Fresh Water, NES- Fesh Water and the NPS-IB, pg. 32, dated September 2025.

[255] S75.1 J Messerly (FS01 T Wells and FS02 H & G Nimmo).

[256] PPC23 Section 32 Report – 6.2 NPS – Fresh Water, NES- Fesh Water and the NPS-IB, pg. 32, dated September 2025.

relevant to the consideration of PPC23. On the basis of Dr. Shadbolt's expert evidence in Appendix 13, I adopt the Proponents assessment and conclude that PPC23 is consistent with the NPS-IB.

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

6.3.40 As this is a request for a zone change, and not to determine the actual use of the site, the NESCS does not strictly apply. The requirements of the NESCS will have to be appropriately addressed at any subsequent subdivision or building consent stage and may either satisfy the permitted activity requirements or require resource consent under the NESCS.

6.3.41 As identified in the Section 7 above, I consider that any risk of developing the land for residential purposes to people's health can be effectively managed under the NESCS.

Canterbury Regional Policy Statement (CRPS)

6.3.42 The CRPS sets out the strategic framework for managing the use, development, and protection of the natural and physical resources of the Canterbury region in an integrated and coordinated manner. I agree with the Proponent that Chapter 6 is most relevant for considering PPC23's consistency with the CRPS.[257]

6.3.43 Chapter 6 of the CRPS was inserted under the Land Use Recovery Plan, section 27 of the Canterbury Earthquake Recovery Act 2011 and clause 20A of schedule 1 to the RMA. This chapter provides a framework for the recovery of Greater Christchurch that enables and supports earthquake recovery and rebuilding of the sub-region. It has subsequently been amended to give effect to the NPS-UD, including the housing bottom lines referenced in the Greater Christchurch Spatial Plan (**GCSP**) and associated Housing Development Capacity Assessment.

6.3.44 As identified in Section 5.3 of this Report, I consider the PPC23 is an *"urban environment"* by virtue of the SPRZ despite it not being identified as such within Chapter 6 Map A. I support the Proponent's position that there is an appropriate pathway for RuUFZ portion of the site to form part of Ōtautahi Christchurch's *"urban environment"* under NPS-UD Policy 8. However, the additional technical assessments listed in paragraph 1.1.8 are required to establish the extent to which PPC23 is consistent with the following relevant CRPS objectives and policies outcomes:

a. Avoids urban development outside of existing urban areas (Objectives 6.2.1 and 6.6.2 and Policies 6.3.1 and 6.3.5) that are only appropriate where the NPS-UD have been satisfied.

b. Protects the landscape values attributed to the Pūharakekenui-Styx River and maintains the character and amenity of rural areas (Objective 6.2.1 and Policies 6.3.2 and 6.3.3).

[257] PPC23 Section 32 Report – 6.5 Canterbury Regional Policy Statement, pg. 39 & 40, dated September 2025.

c. Provides for quality living environments incorporating good urban design and through a range of densities and development forms principles of good urban design (Objective 6.2.3 and Policies 6.3.2 and 6.3.3).

d. Integrates infrastructure and services with land use development, including transport and stormwater networks (Objective 6.2.1 and Policy 6.3.3).

e. Protects people from unacceptable risk from natural hazards and the effects of sea-level rise (Objective 6.2.1 8 and Policy 6.3.3).

f. Integrates transport infrastructure and land development by managing congestion, reducing dependency on public transport, reducing emissions, promoting active and public transport modes and enhancing transport safety (Objective 6.2.4 and Policies 6.3.2, 6.3.3 and 6.3.4).

g. Housing affordability through the provision of a range of lot size, densities and appropriate development controls (Policy 6.3.7).

6.3.45 I agree with the Proponent that the PPC23 ODP is required to achieve a yield of 15hh/ha in accordance with the CDP RNNZ and subdivision provisions (Policy 6.3.7), that indigenous biodiversity will be protected and enhanced (Objective 6.2.1 and Policy 6.3.3) and that the Neighbourhood Centre will enable some self-sufficiency (Policy 6.3.6). I also agree that the provision of a further 800hh will assist in enabling the housing bottom lines to be achieved (Objective 6.2.1a and Policy 6.3.7).

6.3.46 In summary, I consider that PPC23 may be able to demonstrate consistency with the CRPS Chapter 6 objectives and policies. This requires the Proponent to provide the additional assessments listed in paragraph 1.1.8 and incorporate the findings into the PPC23 ODP to supplement the recommended amendments in Appendix 3. Consequently, I am unable to establish whether PPC23 is consistent with the relevant CRPS objectives and policies. Therefore, I recommend that the submission that opposes PPC23 because it is contrary to the CRPS is accepted pending these matters being addressed in the Proponent's evidence.[258]

Regional Plans

6.3.47 The CDP, as amended by PPC23, cannot be inconsistent with the LWRP and Canterbury Air Regional Plan. The PPC23 site is subject to a range of geophysical features that make it prone to natural hazard risks, including its proximity to the Pūharakekenui-Styx River and the coastal environment. I agree with the Proponent[259] that the establishment of activities within the PPC23 site should the rezoning be approved will either need to meet the permitted activity conditions of these plans or resource consents will be required under the regional plans that are in place at the time.

6.3.48 However, the exposure of the site to natural hazard events needs to be substantiated through the provision of the assessments listed in paragraph 1.1.8, which will assist in establishing the

[258] S75.1 J Messerly (FS01 T Wells and FS02 H & G Nimmo).

[259] PPC23 Section 32 Report – Section 6.6 CLWRP and Canterbury Air Regional Plan, pg.40 & 41.

appropriateness of the rezoning and the likely regional consenting pathways that would need to be followed should PPC23 be approved. This includes obtaining resource consents to undertake development works within a site that is subject to a high ground water table, in proximity to a river and near the coastal environment.

6.3.49 I do not consider it is appropriate to require the Proponent to prepare a regional consenting feasibility assessment as part of this process as the detailed engineering designs are unlikely to have been completed. Therefore, I recommend the submission opposing PPC23 because a regional consenting feasibility assessment is rejected.[260]

6.4 STRATEGIES AND PLANS

Greater Christchurch Spatial Plan (GCSP)

6.4.1 The GCSP is a strategy prepared under the Local Government Act that sets out the desired urban form for the sub-region for the next 30 years. It is the FDS for Ōtautahi Christchurch, and the Selwyn and Waimakariri districts under the NPS-UD.

6.4.2 I adopt the Proponent's summary of the GSCP and the opportunities that are relevant to the consideration of PPC23.[261] I agree that PPC23 aligns with the outcomes sought in respect to:

a. Recognising the cultural and historic sites of significance (Opportunity 1).

b. The development works facilitating ecological enhancements and promoting access to the Pūharakekenui-Styx River (Opportunity 3).

c. Enabling some additional 'greenfield' housing capacity (Opportunity 4).

d. The Neighbourhood Centre provides some small local offerings to assist in a low carbon future (Objective 5).

6.4.3 However, I consider that the additional technical assessments listed in paragraph 1.1.8 are required and any findings incorporated into the PPC23 ODP to supplement the recommended amendments in Appendix 3 to achieve the GCSP strategic outcomes. These include addressing the natural hazard risks associated with the site (Opportunity 2) and prioritising sustainable and accessible transport choices that significantly reduce greenhouse gas emissions (Opportunity 6).

Canterbury Regional Land Transport Strategy 2024-34 (CRLTS)

6.4.4 The Proponent has not provided an assessment of PPC23 against the CRLTS based on the conclusion of the Novogroup ITA that the site is subject to an existing urban zone and there are no adverse transport effects.[262] Mr. Smith has helpfully evaluated the CRLTS in his evidence,

[260] 75.9 J Messerly.

[261] PPC23 Section 32 Report – Section 6.3 Spatial plans and strategies, pg.33 to 35.

[262] PPC23 1st Request for further information response – Item 6), pg.2, 7 July 2025 - https://ccc.govt.nz/.

which I adopt for the purposes of determining the extent to which PPC23 has *"had regard"* to the CRLTS.

6.4.5 I support Mr. Smith's conclusion that the Proponent needs to provide the additional assessments listed in paragraph 1.1.8 and incorporating the findings into the PPC23 ODP to supplement the recommended amendments in Appendix 3. These actions may assist to achieve an acceptable level of accessibility, improve transport network safety and efficiency, and to mitigate the flood hazard risk on the transport network. Consequently, I consider that PC23 may be able to deliver the CRLTS strategic outcomes if these matters of concern are addressed.

Mahaanui Iwi Management Plan 2013 (MIMP)

6.4.6 The MIMP is a planning document recognised by an iwi authority and lodged with the council, which includes content that relates to the district's resource management issues. As identified in the Section 5.10 assessment of cultural values and sites of significance, I consider that PPC23 will support access to the traditional pathway between Ngāi Tūāhuriri Pa to the sea, and that the 2022 CIA recommendations and the discovery of middens or other sites of cultural significance should they be discovered can be protected through the standard RMA consenting processes.

6.4.7 I agree with and adopt the PPC23 MIMP assessment and conclusions.[263] Consequently, I consider that PPC23 has *"taken into account"* the MIMP under section 74(2A) and there are no specific resource management issues, or specific sites of significance to Mana Whenua, that would be compromised by the granting of the request.

7 CHRISTCHURCH DISTRICT PLAN

7.1.1 The relevant CDP provisions need to be considered when determining the appropriateness of PC23 and evaluating the relief sought in submissions. The PPC23 Section 32 Report evaluates the proposal against the relevant CDP Strategic Directions, objectives and policies in Appendix J. PPC23's primary reliance on the settled CDP provisions, including the RNNZ, RuUFZ and OWMZ, ensures that the amendments being sought will be consistent with the Chapter 3 Strategic Directions and the supporting objectives and policies.

7.1.2 However, as noted throughout this Report, the expert evidence has identified apparent shortcomings with the technical assessments that have been provided in support of PPC23. The provision of supplementary assessments and expert evidence to establish any further changes to the PPC23 to satisfy the concerns expressed in the evidence prepared by Council's discipline experts. The reliance on the technical assessments within the notified version of PPC23 brings into question the robustness of the CDP objectives and policies assessment in Appendix J, and the associated conclusions that have been reached. Consequently, I encourage the Proponent to provide an updated assessment of the relevant CDP objectives and policies once the additional

[263] PPC23 Section 32 Report – Section 4.8 Cultural Values, pg.25 to 27.

information that is requested in paragraph 1.1.8 is provided. The appropriateness of the recommended amendments to the ODP in Appendix 3 should also be evaluated.

8 SECTION 32 AND 32AA EVALUATION

8.1 EVALUATION SUMMARY

8.1.1 Section 32 of the Act requires the Proponent to carry out an evaluation of the plan change to examine the extent to which relevant objectives are the most appropriate way to achieve the purpose of the Act, and whether, having regard to their efficiency and effectiveness, the related policies, rules, or other methods are the most appropriate for achieving the objectives.

8.1.2 On the basis of the expert evidence, I consider that PPC23 does not substantiate the benefits or effectively identify and address the costs of the rezoning relative to the operative CDP provisions. The Proponent is encouraged to provide an addendum Section 32 evaluation once the outstanding information is provided (as referenced in paragraph 1.1.9).

8.1.3 Having considered PPC23 as notified, the evidence prepared by Council's experts, the submissions and the relevant planning instruments, I conclude that the PPC23 ODP as notified does not substantiate that the requested CDP amendments are the most appropriate way to deliver the PPC23 objective or achieve the purpose of the Act.

8.1.4 This is because the benefits and costs have not been substantiated to the extent necessary to satisfy the relevant statutory tests, including in respect to housing and business sufficiency, character, amenity and visual effects, stormwater management, transport safety, efficiency and accessibility and natural hazard risks.

8.1.5 On the basis of the expert evidence, I consider that PPC23 as notified could give rise to adverse environmental effects and outcomes that are inconsistent with the objectives and policies of the CDP and the relevant planning instruments that manage urban growth across Ōtautahi Christchurch. The additional assessments listed in paragraph 1.1.8 and the incorporation of any findings into the PPC23 ODP to supplement the recommended amendments in Appendix 3 are essential to confirming that the PPC23 provisions are the most effective at achieving the required outcomes and that the benefits of the rezoning outweigh the costs.

8.1.6 The Section 32AA evaluation in Appendix 2 establishes the appropriateness of the recommended amendments to the PPC23 ODP. These need to be supplemented with any additional changes to PPC23 that may arise from the findings of the technical assessments listed in paragraph 1.1.8 to:

a. Mitigate adverse effects.

a. Substantiate the costs and benefits.

b. Establish consistency with the CDP, relevant planning instruments and national directions.

c. Achieve the purpose of the Act.

9 CONCLUSIONS AND RECOMMENDATIONS

9.1.1 Having considered all the available evidence, the submissions and reviewed all relevant instruments and statutory considerations, I consider that PPC23 as notified does not:

a. Address all adverse environmental effects.

b. Deliver a well-integrated and connected urban environment that is resilient to natural hazard risks.

c. Substantiate the benefits or quantify the costs of the rezoning to the extent necessary that it is more effective and efficient than the operative SPRZ provisions.

d. Establish that the rezoning will deliver the outcomes expressed in the CRPS and CDP objectives and policies.

e. Achieve the outcomes in the objectives and policies of the NPS-UD, NPS-NH, NPS-I and NPS-FWM.

f. Achieve the purpose and principles of the Act.

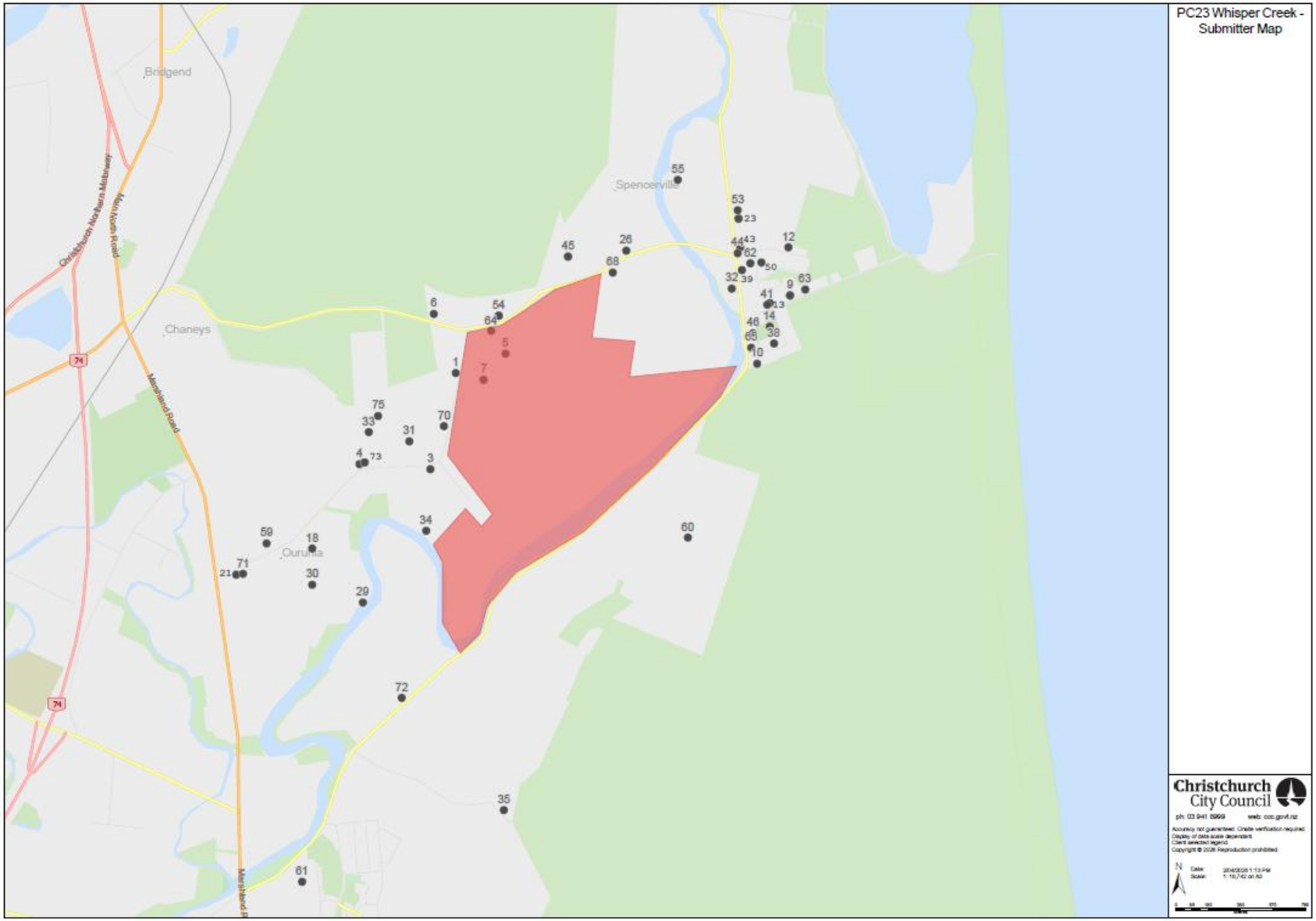
9.1.2 Under these circumstances, I cannot support the rezoning of the land and recommend that PPC23 is declined.

9.1.3 Should the Hearing Commissioner choose to support the rezoning in the absence of the additional technical reports listed in paragraph 1.1.8, I recommend that:

a. The amendments to the ODP set out in Appendix 3 and evaluated in Appendix 2 are considered.

9.1.4 My recommendations on the relief sought in submissions are set out in Appendix 4 to this Report, which may change following the provision of further evidence and hearing presentations.

APPENDIX 1 – MAP OF SUBMITTERS NEAR THE SITE AND SUMMARY OF SUBMISSIONS BY TOPIC


PC23 Whisper Creek - Submitter Map
Bridgend
Chaneys
Spencerville
Ouruhia
Christchurch Northern Motorway
Main North Road
Marshland Road
74
Christchurch City Council

Topic	Submission	Decision sought
a. DUE PROCESS		
Due process Support – Strongly disagree with the SRA stance whose views aren't representative of the local community. Oppose - No/limited consultation with the community; No consultation with the landowners that are subject to the rezoning; Iwi need to be consulted; and Undisclosed issues that have failed to be addressed.	S12.1 A Greaves	Support
	S14.1 SRA; S19.1 M van Valkenburg; S20.1 D Riwaka; S22.1 D Elkington; S23.1 R Howison (FS02 H & G Nimmo – Support); S32.1 C Elkington; S45.1 D Knight (FS01 T Wells – Support); S54.1 J Lowe; and S63.1 J Burns; S70.1 ŌRG (FS01 T Wells & FS03 R Muschamp - Support). S75.11 J Messerly (Alternate relief if approved – The section 32, LWRP, ODP CIA, ITA are inadequate and no strategic infrastructure or climate change adaption evaluation have been provided) and S75.12 J Messerly (Alternate relief – The School safety and active transport assessment, construction effects management plan, transport emissions analysis, firefighting and emergency response assessment and other matters listed in paragraph 14.12 need to be peer reviewed and additional matters included.	Reject
b. URBAN FORM		
Urban form Support – Great location; and Carefully considered ODP; and Not highly productive land. Oppose - Disregards District Plan rules and SPRZ; Inconsistent with urban growth policies and does not represent a 'well-functioning urban environment;' Scale is too intensive; Highly Productive Land; Urban form; Urban sprawl; and Precedent effects.	S08.1 True Form Building Ltd (TFBL); S40.1 A Neate; S52.1 Gramco Ltd and S58.1 D Tipple (FS02 H&G Nimmo – Oppose).	Support
	S69.3 ECan (Pending confirmation that the out of sequence zoning is consistent with NPS-UD policy 8).	Neutral
	S11.1 K Foot; S15.1 K Van de Loo; S31.1 Angela (FS01 T Wells – Support); S32.1 C Elkington; S35.1 R Ennor; S43.1 K Bowden; S45.1 D Knight (FS01 T Wells – Support); S51.1 G Lowe; S65.1 C Faithfull; S67.1 D Gilmore; S71.1 K & A Buxton; S74.1 M Wells; and S75.1 J Messerly (FS01 T Wells & FS02 H & G Nimmo – Support).	Reject
c. HOUSING AND BUSINESS SUFFICIENCY AND DEVELOPMENT FEASIBILITY		
Housing and business sufficiency and development feasibility Support - Assists in addressing undersupply and increasing housing options. Oppose - Sufficient zoned capacity for next 30 years; No affordable or community housing; Proponent doesn't own all the land that will compromise feasibility & yield; No demand, Exaggerated economic benefits; and Insufficient commercial centre.	S8.1 True Form Building Ltd (TFBL); and S58.1 D Tipple (FS02 H&G Nimmo – Oppose).	Support
	S14.1 SRA; S19.1 M van Valkenburg; S22.1 D Elkington; S23.1 R Howison (FS02 H & G Nimmo – Support); S30.1 L Bennett; S32.1 C Elkington; S34.1 D Ling (FS01 T Wells – Support); S54.1 J Lowe; S63.1 J Burns; S70.1 ŌRG (FS01 T Wells & FS03 R Muschamp - Support); S71.1 K & A Buxton; and S75.7 J Messerly (FS01 T Wells and FS02 H & G Nimmo– Support). S75.7 J Messerly (Alternate relief – Provide an updated peer reviewed economic analysis of the scale of the retail floorspace, retail distribution effects and consistency with regional and district policy).	Reject
d. CHARACTER, AMENITY AND VISUAL EFFECTS		
Character, amenity and visual effects	S08.1 True Form Building Ltd (TFBL); S12.1 A Greaves; and S58.1 D Tipple (FS02 H&G Nimmo – Oppose).	Support

Topic	Submission	Decision sought
Support - Great lifestyle options; Enhance character & amenity; Supports housing diversity; and Great location near an existing primary school. Oppose - Compromise lifestyle living and reduced quality of life; Rural residential amenity; Rural amenity; Small settlement character; Undermines landscape values; and Loss of greenspace.	S05.1 C Shaw (Unstated); S46.1 & 46.2 A Hicks (controls to preserve natural values and greenbelt between the site and Spencerville) and S33.1 K & L Wells (Retain rural outlook).	Neutral
	S01.1 J Dutkiewicz; S02.1 S Blackler; S04.1 R Watson (FS01 T Wells – Support); S06.1 S & K Baker; S09.1 M Pierce; S11.1 K Foot; S14.1 SRA; S15.1 K Van de Loo; S16.1 C Howison; S19.1 M van Valkenburg; S22.1 D Elkington; S23.1 R Howison (FS02 H & G Nimmo – Support); S24.1 D Lowe; S26.1 C Wakelin; S25.8 SLLT (Retain the 5m wide native landscape strip); S30.1 L Bennett; S31.1 Angela (FS01 T Wells – Support); S32.1 C Elkington; S33.4 K & L Wells (Housing design controls); S35.1 R Ennor; S36.1 H King; S38.1 N Duxbury; S39.1 A Te Ohaere-Fox; S41.1 M Gilmore; S42.1 J Knight (FS01 T Wells – Support); S43.1 K Bowden; S44.1 V Knowles; S45.1 D Knight (FS01 T Wells – Support); S53.1 R & K Winter; S54.1 J Lowe; S55.1 MWFT; S63.1 J Burns; S70.1 ŌRG (FS01 T Wells & FS03 R Muschamp - Support)); S71.1 K & A Buxton; S72.1 P Hargreaves; and S75.1 J Messerly (FS01 T Wells & FS02 H & G Nimmo – Support). S04.2 R Watson (Alternate relief – No more than 165 houses, more extensive road boundary setbacks, greenbelt and landscape buffer to support wildlife and recreation are provided); S24.2 D Lowe (Alternate relief – Mitigate submitters concerns if approved); S33.4 K & L Wells (request high standard housing); S52.1 Gramco Ltd (Require 75% of 176 Turners Road is residential and 25% is stormwater) and S71.2 K & A Buxton (Non-complying activity for any subdivision that is inconsistent with the ODP that fails to satisfy RDA Rule RD 2 in 8.5.1.5); S71.4 K & A Buxton; (Add a new ODP in Appendix 8.4.1.2 including existing and new roading, stormwater areas, areas to be protected for natural values and open space); S71.5 K & A Buxton (include the extended pedestrian and cycling network and internal loop road in the relevant objectives, policies and ODP); S73.2 T Watson-Wells (Alternate relief – Reduced household yield of 165 or fewer and more extensive building setbacks).	Reject
e. INFRASTRUCTURE, LAND DEVELOPMENT AND NUISANCE EFFECTS		
3Waters Support - Stormwater management along existing drains. Oppose - Water contamination & pressure; Insufficient water & wastewater capacity; Increased costs; Compromised Styx River water quality and access to groundwater; Sediment loading; and CCC to ensure compliance with the Styx River stormwater discharge consent conditions.	S25.1 SLLT.	Support
	S59.4 ŌMS (Support where the PPC23 provisions encourage staged and integrated infrastructure development).	Support in part
	S18.1 Z Duan (Groundwater protection monitoring and adequate stormwater management); S25.9 SLLT (stormwater management & monitoring); S33.3 K & L Wells (CCC reticulated water network connection to ensure wells remain viable); S69.1 ECan (Pending confirmation that ECan consents can be obtained to the extent that the rezoning is viable); S69.2 ECan (Pending confirmation that the stormwater basins will not compromise groundwater and hydrology system); and S69.3 ECan (Pending confirmation that the out of sequence zoning is consistent with NPS-UD policy 8 infrastructure coordination outcomes and costs).	Neutral
	S02.1 S Blackler; S06.1 S & K Baker; S11.1 K Foot; S13.1 J Kennedy; S14.1 SRA; S16.1 C Howison; S17.1 T Wilson; S19.1 M van Valkenburg; S21.1 R Riwaka; S21.1 C Mitchell; S22.1 D Elkington; S23.1 R Howison (FS02 H & G Nimmo – Support); S24.1 D Lowe; S26.2 C Wakelin; S28.1 D Parker; S29.1 M Stewart; S30.1 L Bennett; S31.1 Angela (FS01 T Wells – Support); S32.1 C Elkington; S34.1 D Ling (FS01 T Wells – Support); S35.1 R Ennor; S37.1 M Skelly; S41.1 M Gilmore; S42.1 J Knight FS01 T Wells – Support); S43.1 K Bowden; S45.1 D Knight (FS01 T Wells – Support); S47.1 J Burney; S51.1 G Lowe; S54.1 J Lowe; S55.1 MWFT; S57.1 J Hawkins, S62.1 A McKenzie; S63.1 J Burns; S65.1 C Faithfull; S68.1 L Maurice; S70.1 ŌRG (FS01 T Wells & FS03 R Muschamp - Support); S71.1 K & A Buxton; S74.1	Reject

Topic	Submission	Decision sought
	M Wells; and S75.1 J Messerly (FS01 T Wells & FS02 H & G Nimmo – Support). S24.2 D Lowe (Alternate relief – Mitigate submitters concerns if approved); S29.1 M Stewart (Alternate relief – Address deficiencies in the wastewater assessment); S52.1 Gramco Ltd (Requite that stormwater is sized to handle the run-off from the site to 176 Turners Road); S61.1 P McGuigan (Pending calculations that confirm the capacity of Spencer's Drain); S73.5 T Watson-Wells (Alternate relief – Appropriate infrastructure); S75.2 J Messerly (Alternate relief – Flood & tidal modelling); S75.3 J Messerly (Alternate relief - Rezone the lower terrace HFHMA and ponding areas as "Conservation" zoning, widen the riparian corridor to a min. of 20m and relocate the stormwater basins outside of the high hazard area); and S75.6 J Messerly (Alternate relief – Provide a full infrastructure funding plan).	
Utilities Oppose - Lack of telecommunications and power.	S06.1 S & K Baker; and S41.1 M Gilmore.	Reject
Reserves Support - Improved recreation areas. Oppose - Insufficient amenities.	S07.1 D & K Casey; S8.1 True Form Building Ltd (TFBL); and S25.1 SLLT.	Support
	S25.2 SLLT (Developer to partner with the Trust); and S33.4 K & L Wells (Reserve requirements).	Neutral
	S51.1 G Lowe. S46.2 A Hicks (Accept only if greenbelt & landscape buffer to support wildlife & recreation are provided).	Reject
Land development and nuisance effects Oppose – Adverse nuisance effects (noise, dust, vibration and light spill); Run-off; and Land development effects (sequenced development, and environmental controls and construction phase vehicle movements).	S26.7 SLLT (Mitigate light spill on ecosystems and Styx River); and S25.10 SLLT (Reduce speeds and include signage to protect birds).	Neutral
	S01.1 J Dutkiewicz; S02 S Blackler; S03.1 I Blackler; S06.1 S & K Baker; S14.1 SRA; S14.4 SRA; S19.1 M van Valkenburg; S23.1 R Howison (FS02 H & G Nimmo – Support); S24.1 D Lowe; S26.1 C Wakelin; S30.1 L Bennett; S31.1 Angela (FS01 T Wells – Support); S34.1 D Ling (FS01 T Wells – Support); S36.1 H King; S63.1 J Burns; S68.1 L Maurice; S70.1 ŌRG (FS01 T Wells & FS03 R Muschamp - Support); 73.1 T Watson-Wells; and S75.1 J Messerly (FS01 T Wells & FS02 H & G Nimmo – Support). S4.2 R Watson (Alternate relief – Low level lighting); S14.4 SRA (Alternative relief - Sequenced development & construction management plan); S19.4 M van Valkenburg & S23.4 R Howison; (Alternate relief – Sequenced development & construction management plan); S24.2 D Lowe; S25.7 & 25.10 SLLT (Alternate relief – Mitigate submitters concerns if approved); S63.1 J Burns (Alternative relief - Sequenced development & construction management plan); S70.4 ŌRG (Alternate relief – Sequenced development & construction management plan); and S73.3 T Watson-Wells (Alternate relief – Low level lighting).	Reject
Community facilities Support - Assist Ōuruhia Model School to grow and maintain its long-term viability. Oppose - Ōuruhia Model School capacity constraints; No community facilities; and Lack of amenities.	S7.1 D & K Casey; S8.1 True Form Building Ltd (TFBL); and S59.1 ŌMS;	Support
	S59.2 ŌMS (Support where the ODP facilitates a safe active travel route to the school); S59.3 ŌMS (Support where the ODP facilitates place-based ecology learning); and S59.4 ŌMS (Support where the PPC23 provisions encourage staged and integrated infrastructure development).	Support in part
	S22.1 D Elkington; S29.1 M Stewart; S32.1 C Elkington; and S51.1 G Lowe.	Reject
f. TRANSPORT NETWORK SAFETY, EFFICIENCY AND ACCESSIBILITY		
Transportation network	S07.1 D & K Casey; S08.1 True Form Building Ltd (TFBL); S40.1 A Neate; and S25.1 SLLT.	Support

Topic	Submission	Decision sought
Support - Improved roads with cycle tracks; and Improved access to public transport. Oppose - Vehicle movements and congestion; Safety; Lack of footpaths and public transport; Lower Styx Road access; Traffic lights; Tsunami event evacuation risk; Insufficient sight lines; Uncontrolled railway barriers at the Chaney's Road crossing; and Increased carbon use & emissions.	S59.2 ŌMS (Support where the ODP facilitates a safe active travel route to the school); and S59.4 ŌMS (Support where the PPC23 provisions encourage staged and integrated infrastructure development).	Support in part
	S18.1 Z Duan (ITA required and developer funding of network improvements); S25.10 SLLT (Reduce speeds and include signage to protect birds); S33.2 K & L Wells (Main access is off Lower Styx Road); and S69.4 ECan (Pending confirmation that the out of sequence zoning is consistent with NPS-UD policy 8 transport outcomes).	Neutral
	S01.1 J Dutkiewicz; S02.1 S Blackler; S03.2 I Blackler; S04.1 R Watson (FS01 T Wells – Support); S06.1 S & K Baker; S09.1 M Pierce; S10.1 D Miller; S11.1 K Foot; S14.1 SRA; S15.1 K Van de Loo; S16.1 C Howison; S17.1 T Wilson; S19.1 M van Valkenburg; S21.1 C Mitchell; S22.1 D Elkington; S23.1 R Howison (FS02 H & G Nimmo – Support); S24.1 D Lowe; S26.1 C Wakelin; S27.1 A Smirnoff; S28.1 D Parker; S29.1 M Stewart; S30.1 L Bennett; S31.1 Angela (FS01 T Wells – Support); S32.1 C Elkington; S34.1 D Ling (FS01 T Wells – Support); S35.1 R Ennor; S36.1 H King; S37.1 M Skelly; S39.1 A Te Ohaere-Fox; S41.1 M Gilmore; S42.1 J Knight FS01 T Wells – Support); S44.1 V Knowles; S45.1 D Knight (FS01 T Wells – Support); S47.1 J Burney; S48.1 B Uren; S49.1 N Hough; S51.1 G Lowe; S54.1 J Lowe; S55.1 MWFT; S57.1 J Hawkins; S62.1 A McKenzie; S63.1 J Burns; S65.1 C Faithfull; S66.1 D English; S67.1 D Gilmore; S68.1 L Maurice; S70.1 ŌRG ((FS01 T Wells & FS03 R Muschamp - Support); S71.1 K & A Buxton; S72.1 P Hargreaves; 73.1 T Watson-Wells; S74.1 M Wells; and S75.1 J Messerly (FS01 T Wells & FS02 H & G Nimmo – Support). S03.1 I Blackler (Alternate relief – Primary access should be to Lower Styx Road); S04.2 R Watson (Alternate relief – Reinstate Lower Styx Road Bridge and Turners Road pathways); S24.2 D Lowe (Alternate relief – Mitigate submitters concerns if approved); S29.2 M Stewart (Alternate relief – Address deficiencies in the ITA); S46.1 A Hicks (Accept only if significant conditions enhance connectivity & cycle safety); S46.3 A Kicks (Accept only if significant safety upgrades to Spencerville Road and Lower Styx Road are funded and delivered); S46.4 A Kicks (Accept only if the shared path network is redesigned); S73.2 T Watson-Wells (Alternate relief – Reduced traffic using the upgrade bridge onto Lower Styx Road); and S75.2 J Messerly (Alternate relief – Transport modelling, ITA and Tsunami evacuation travel time modelling).	Reject
g. HUMAN HEALTH AND NATURAL HAZARD RISKS		
Human health Neutral – Stormwater management and monitoring; Regional consenting; and Contaminated land risk. Oppose - Contaminated land risk; Deficient contamination report; and Radio frequency (S14.1 SRA, S19.1 M van Valkenburg, S22.1 D Elkington & S23.1 R Howison;)	S25.9 SLLT (Stormwater management & monitoring); S69.1 ECan (Pending confirmation that ECan consents can be obtained to the extent that the rezoning is viable); and S69.1 ECan (Confirmation that the presence of contaminants at 165 Turners Road is determined).	Neutral
	S14.3 SRA; S19.1 M van Valkenburg; S22.1 D Elkington; S23.1 R Howison (FS02 H & G Nimmo – Support); S30.1 L Bennett; S32.1 C Elkington; S70.1 ŌRG (FS01 T Wells & FS03 R Muschamp - Support); and S75.1 J Messerly (FS01 T Wells & FS02 H & G Nimmo – Support). S14.3 SRA, S19.3 M van Valkenburg & S23.3 R Howison (Alternate relief – Additional independent testing); S70.3 ŌRG (Alternate relief - Additional independent testing); and S75.9 J Messerly (Alternate relief – Provide full PSI, DSI, LMP & RAP assessments).	Reject
Natural hazards Oppose - Flood risk; Tsunami risk; Styx River flooding; Ponding; Effects of climate	S18.1 Z Duan (Inclusion of an onsite detention basin sized to ensure no net increase in 10 and 100m year peak flows to downstream receiving environments); S69.2 ECan (Pending confirmation that the stormwater basins will not compromise groundwater and hydrology system); and S69.4 ECan (Pending confirmation that the out of sequence zoning is	Neutral

Topic	Submission	Decision sought
change; Geotechnical risk (liquefaction, lateral displacement and land instability); and Compromised local hydrology.	consistent with NPS-UD policy 8 does not increase exposure to natural hazards).	
	S9.1 M Pierce; S10.1 D Miller; S11.1 K Foot; S13.1 J Kennedy; S14.1 SRA; S15.1 K Van de Loo; S16.1 C Howison; S17.1 T Wilson; S19.1 M van Valkenburg; S20.1 D Riwaka; S21.1 C Mitchell; S22.1 D Elkington; S23.1 R Howison (FS02 H & G Nimmo – Support); S24.1 D Lowe; S27.1 A Smirnoff; S28.1 D Parker; S30.1 L Bennett; S32.1 C Elkington; S34.1 D Ling (FS01 T Wells – Support); S35.1 R Ennor; S38.1 N Duxbury; S41.1 M Gilmore; S42.1 J Knight FS01 T Wells – Support); S45.1 D Knight (FS01 T Wells – Support); S50.1 D McGarvey; S51.1 G Lowe; S54.1 J Lowe; S55.1 MWFT; S56.1 A Scott; S63.1 J Burns; S66.1 D English; S67.1 D Gilmore; S70.1 ŌRG (FS01 T Wells & FS03 R Muschamp - Support); S72.1 P Hargreaves; 73.1 T Watson-Wells; S74.1 M Wells; and S75.1 J Messerly (FS01 T Wells & FS02 H & G Nimmo – Support). S24.2 D Lowe (Alternate relief – Mitigate submitters concerns if approved); S73.5 T Watson-Wells (Alternate relief – Ensure the infrastructure can withstand flood and tsunami hazards); S75.2 J Messerly (Alternate relief – Full liquefaction & settlement analysis and flood storage displacement modelling); and S75.9 J Messerly (Alternate relief – Provide groundwater rise and salinity intrusion, fill, public health and regional consenting feasibility assessments); and S75.3 J Messerly (Alternate relief – Map all Qualifying Matters, complete a full section 77L evaluation, demonstrate the *"least modification necessary"* to MR.DS and incorporate hazard the infrastructure constraints in the zoning).	Reject
h. REVERSE SENSITIVITY		
Reverse sensitivity Oppose - Compromise rural productive activities; and Impacts on the consented Rolling Meadows festival	S14.1 SRA; S19.1 M van Valkenburg; S23.1 R Howison (FS02 H & G Nimmo – Support); S30.1 L Bennett; S32.1 C Elkington; S45.1 D Knight (FS01 T Wells – Support); S60.1 Rolling Meadows; S63.1 J Burns; S67.1 D Gilmore, S68.1 L Maurice; and S70.1 ŌRG (FS01 T Wells & FS03 R Muschamp - Support).	Reject
i. NATURAL, CULTURAL AND HERITAGE VALUES		
Natural values and ecology Support - Extensive Styx River margin zone; Public access to the Styx River, and Ecological restoration. Oppose - Nature and wildlife; Compromise Styx River and riparian margin; Impact native inanga & other wildlife; and Vague ecology risk assessment.	S25.1 SLLT; and S58.1 D Tipple (FS02 H&G Nimmo – Oppose).	Support
	S59.3 ŌMS (Support where the ODP facilitates place-based ecology learning).	Support in part
	S18.1 Z Duan (Minimum riparian buffer – 10m to 20m); S25.2 SLLT (developer enters into partnership with the Trust); S25.3 SLLT (A robust avian management plan is developed and implemented); S25.4 SLLT (the intermittent wetlands are monitored for size and area coverage prior to earthworks commencement, and assessed against the CRPS Sites of Ecological Significance criteria); S25.5 SLLT (mitigate sediment, monitor and enhance fish habitats); S25.6 SLLT (Lizard Management Plan); S26.7 SLLT (mitigate light spill on ecosystems and Styx River); S25.8 SLLT (retain the 5m wide native landscape strip); S25.11 SLLT (fencing and signage to manage dogs to protect habitats); S69.1 ECan (pending an ecology impact assessment that demonstrates consistency with CRPS Policy 9.3.1 and Appendix 3).	Neutral
	S09.1 M Pierce; S14.1 SRA S19.1 M van Valkenburg; S20.1 D Riwaka; S22.1 D Elkington; S23.1 R Howison (FS02 H & G Nimmo – Support); S27.1 A Smirnoff; S28.1 D Parker; S30.1 L Bennett; S31.1 Angela (FS01 T Wells – Support); S32.1 C Elkington; S34.1 D Ling (FS01 T Wells – Support); S35.1 R Ennor; S36.1 H King; S37.1 M Skelly; S41.1 M Gilmore; S49.1 N Hough; S51.1 G Lowe; S54.1 J Lowe; S55.1 MWFT; S57.1 J Hawkins; S63.1 J Burns; S65.1 C Faithfull; S68.1 L Maurice; S70.1 ŌRG	Reject

Topic	Submission	Decision sought
	(FS01 T Wells & FS03 R Muschamp - Support); S71.1 K & A Buxton; and S75.1 J Messerly (FS01 T Wells & FS02 H & G Nimmo – Support). S46.1 A Hicks (Accept only if significant conditions address preservation of natural values); S46.2 A Hicks (Accept only if greenbelt & landscape buffer to support wildlife & recreation are provided); S75.3 J Messerly (Alternate relief - Rezone the lower terrace HFHMA and ponding areas as "Conservation" zoning, widen the riparian corridor to a min. of 20m and relocate the stormwater basins outside of the high hazard area).	
Cultural & historic values Oppose - Cultural values; Heritage values; and Compromised traditional pathway (between Ngāi Tuahuriri Pa to the sea).	S04.1 R Watson (FS01 T Wells – Support); S14.1 SRA; S19.1 M van Valkenburg; S20.1 D Riwaka. S22.1 D Elkington; S23.1 R Howison (FS02 H & G Nimmo – Support); S30.1 L Bennett; S41.1 M Gilmore; S57.1 J Hawkins; S63.1 J Burns; S63.1; S70.1 ŌRG (FS01 T Wells & FS03 R Muschamp - Support); 73.1 T Watson-Wells; and S75.1 J Messerly (FS01 T Wells & FS02 H & G Nimmo – Support). S14.2 SRA, S19.2 M van Valkenburg & S23.2 R Howison (Alternate relief – Archaeological study is undertaken); S70.2 ŌRG (Alternate relief – Archaeological study is undertaken); S73.4 T Watson-Wells (Alternate relief – Ascertain cultural and heritage sites); S75.5 J Messerly (Alternate relief – Provide an updated CIA, mahinga kai assessment, archaeological assessment and identify and protect identified wāhi tupuna and wāhi tapu) and S75.10 J Messerly (Alternate relief – Require the Applicant to engage with mana whenua, provide a full ICA prepared by mana whenua and ensure the Treaty principles are 'given effect to').	Reject
j. PROPERTY AND SOCIAL WELLBEING		
Property Oppose - Negatively impact housing market & property values; Rates increases; Inequitable to existing homeowners, Pressure on unwilling sellers; and Costs on neighbours to maintain boundary trees.	S9.1 M Pierce; S10.1 D Miller; S20.1 D Riwaka; S22.1 D Elkington; S24.1 D Lowe; S26.1 C Wakelin; S27.1 A Smirnoff; S28.1 D Parker; S29.1 M Stewart; S32.1 C Elkington; S34.1 D Ling (FS01 T Wells – Support); S35.1 R Ennor; S38.1 N Duxbury; S42.1 J Knight FS01 T Wells – Support); S44.1 V Knowles; S45.1 D Knight (FS01 T Wells – Support); S54.1 J Lowe; S66.1 D English; S72.1 P Hargreaves; and S75.1 J Messerly (FS01 T Wells & FS02 H & G Nimmo – Support). S24.2 D Lowe (Alternate relief – Mitigate submitters concerns if approved); S75.6 & 75.7 J Messerly (Alternate relief – Confirm that ratepayers will not be burdened by the private development).	Reject
Social wellbeing Oppose - Generate anti-social behaviour; Increase in crime; and Change in the community make-up.	S14.1 SRA; S16.1 C Howison; S19.1 M van Valkenburg; S23.1 R Howison (FS02 H & G Nimmo – Support); S30.1 L Bennett; S62.1 A McKenzie; S63.1 J Burns; and S70.1 ŌRG (FS01 T Wells & FS03 R Muschamp - Support).	Reject

APPENDIX 2 – SECTION 32AA EVALUATION

1. As required by RMA section 32AA, this Appendices further evaluates the recommended amendments to ODP contained in PPC23 as notified, which are changes since the Section 32 evaluation was undertaken to establish the appropriateness of the Proponent's schedule of amendments (refer to Appendix K of PPC23). This evaluation should be read in conjunction with PPC23 as notified, this Report and the evidence prepared by the various discipline experts.

2. The recommended changes are limited to the PPC23 ODP plan and narrative and are assessed in Table A below. In evaluating the effects of the amendments in accordance with section 32AA of the Act, the following questions have been considered - Do the changes recommended:

   a. Make a significant difference to the conclusions of the section 32 evaluation?

   b. Have significant effects on their own or in combination with the other amendments?

   c. Address the concerns identified in the expert evidence?

   d. Are within the scope provided for in the submissions received on PPC23?

3. Table A records the amendments proposed by PPC23 as notified are shown as ***italicised bold underlined text in black*** or ~~***black bold strikethrough***~~ text. Any text that is recommended to be added by this Report is shown as ***red bold underlined*** text in italics, to be moved is shown as underlined text in red and to be deleted is shown as ~~***red bold strikethrough***~~ text in italics.

Table A – Evaluation of recommended changes

Changes to PPC23 proposed ODP	Effects and evaluation of changes
ODP Plan	
Amend the ODP plan to relocate the middle of the three proposed Neighbourhood Parks to the upper terrace (RNNZ) further to the north-west adjacent to the recommended additional cycling link.	**The extent to which the amendments make a significant difference to the conclusions of the Section 32 evaluation?** The recommended amendments to the ODP Plan are required to address the concerns raised in submissions and the expert evidence that the ODP as notified does not: • Substantiate or effectively mitigate the adverse effects of the development that would be enabled by the rezoning, particularly in respect to accessibility and transport safety and efficiency. • Deliver a well-integrated and connected urban environment to the extent necessary for it to constitute a *"well-functioning urban environment."*
Amend the ODP plan to relocate the Neighbourhood Centre to the west near the intersection of the two indicative Collector Roads.	

Amend the ODP plan to provide pedestrian and cycle corridor connecting the site between Teapes Road and Ōuruhia School via Turners Road and to Spencerville via Spencerville Road. Amend the ODP plan to provide for a pedestrian and cycle corridor connecting the site to the intersection of Lower Styx Road and Spencerville Road. Amend the ODP plan to provide for three additional pedestrian and cycle connections from the site to Turners Road and Spencerville Road from the proposed internal Collector Road near the Teapes Road intersection to the Pūharakekenui-Styx River riparian margin. Amend the ODP plan to provide for a more direct pedestrian and cycle connection from the amended location of the Neighbourhood Centre to the Neighbourhood Parks.	• Establish consistency with the CDP objectives and policies, relevant national directions or RMA Part 2 matters (refer to Sections 7 and 9 of this Report). **Have significant effects on their own or in combination with the other amendments?** The expert evidence establishes that the recommended accessibility improvements are necessary because the approval of PPC23 would establish an isolated settlement where active modes of travel are likely to be limited. In particular, the additional pedestrian and cycling connections will support transport safety and accessibility to the Neighbourhood Centre, the Pūharakekenui-Styx River, the adjacent roads, Ōuruhia Model School and Spencerville. The accessibility improvements will also ensure there is greater permeability between the site and Teapes Road, Turners Road and Spencerville Road, which will assist in integrating the residential development into the semi-rural area. The recommended amendments also assist in responding to the shortcomings identified by Mr. Smith with the ITA and identified by Ms. Schröder with the Urban Design Assessment provided in support of PPC23. I reiterate that additional assessments are required to substantiate and address transport and urban design related effects (refer to paragraph 1.1.8). The recommended relocation of the Neighbourhood Park and Neighbourhood Centre are necessary to achieve the urban design outcomes recorded in Ms. Schröder and Ms. Smetham's evidence, particularly in respect to integrating public spaces into the residential sections proposed for the upper terrace. **Address the concerns identified in the expert evidence?** The recommended ODP Plan amendments have been identified in Mr. Smith's transport evidence,[264] Ms. Schröder's[265] urban design evidence, Mr. Barnes open space evidence[266] and Ms. Smetham's landscape and visual effects evidence.[267]

[264] Evidence of Mr. Smith, Appendix 11, para. 6, pg.3.

[265] Evidence of Ms. Schröder, Appendix 5, para.41 (e) to (f), pg. 16 & 17

[266] Evidence of Mr. Barnes, Appendix 10, para. 28, pg.4.

[267] Evidence of Ms. Smetham, Appendix 7, para.87, pg. 20.

	Are within the scope provided for in the submissions received on PPC23? There is scope for the recommended ODP Plan amendments as the submitters oppose PPC23 because it may result poor accessibility and adverse transport effects.[268]
ODP Narrative	
Move item 4 of the ODP narrative 8.10.31C DEVELOPMENT FORM AND DESIGN to 8.10.31D DEVELOPMENT REQUIREMENTS as new item c. of 1. INTEGRATION with the following narrative and consequential renumbering: *c. The total yield shall not exceed 800 households consistent with the available volume of potable water and capacity of the local pressure wastewater network that form part of the supporting infrastructure to service the site.*	This amendment is not necessary to address a significant issue identified in submissions or evidence. However, it is considered appropriate that this important development constraint is included as an ODP *"development requirement"* in 8.10.31.D rather than a *"design consideration"* in 8.10.31 C. This change emphasises the weighting the Proponent has placed on the wastewater constraint to achieve the MRDS qualifying matters. It will also assist in Plan administration and maintaining consistency with other CDP ODP requirements by ensuring sufficient priority is placed on the household cap arising from the infrastructure servicing constraint.
Move item 4 of the ODP narrative 8.10.31C DEVELOPMENT FORM AND DESIGN to 8.10.31D DEVELOPMENT REQUIREMENTS as new item d. of 1. INTEGRATION with the following narrative and consequential renumbering: ***d.** Where the RNN abuts or is opposite properties in the Rural Urban Fringe Zone **and the Rural Waimakariri Zone** larger section sizes **are ~~anticipated~~required, including 60% of the lots be a minimum of 1,000m² along Turners Road and***	**The extent to which the amendments make a significant difference to the conclusions of the Section 32 evaluation?** The recommended amendments to the ODP narrative are required to address the concerns raised in submissions and the expert evidence that the ODP as notified does not: • Substantiate or effectively mitigate the adverse effects of the development that would be enabled by the rezoning. • Recognise the context and character of the development that would be enabled by PPC23, including how it can effectively integrate with the adjacent land use activities. • Establish consistency with the CDP objectives and policies, relevant national directions or RMA Part 2 matters (refer to Sections 7 and 9 of this Report).

[268] S01.1 J Dutkiewicz, S02.1 S Blackler, S03.2 I Blackler, S04.1 R Watson *(FS01 T Wells – Support)*, S06.1 S & K Baker, S09.1 M Pierce, S10.1 D Miller, S11.1 K Foot, S14.1 SRA, S15.1 K Van de Loo, S16.1 C Howison, S17.1 T Wilson, S19.1 M van Valkenburg, S21.1 C Mitchell, S22.1 D Elkington, S23.1 R Howison *(FS02 H & G Nimmo – Support)*, S24.1 D Lowe, S26.1 C Wakelin, S27.1 A Smirnoff, S28.1 D Parker, S29.1 M Stewart, S30.1 L Bennett, S31.1 Angela *(FS01 T Wells – Support)*, S32.1 C Elkington, S34.1 D Ling *(FS01 T Wells – Support)*, S35.1 R Ennor, S36.1 H King, S37.1 M Skelly, S39.1 A Te Ohaere-Fox, S41.1 M Gilmore, S42.1 J Knight *(FS01 T Wells – Support)*, S44.1 V Knowles, S45.1 D Knight *(FS01 T Wells – Support)*, S46.2 A Hicks, S47.1 J Burney, S48.1 B Uren, S49.1 N Hough, S51.1 G Lowe, S54.1 J Lowe, S55.1 MWFT, S57.1 J Hawkins, S62.1 A McKenzie, S63.1 J Burns, S65.1 C Faithfull, S66.1 D English, S67.1 D Gilmore, S68.1 L Maurice, S70.1 ŌRG *(FS01 T Wells & FS03 R Muschamp - Support)*, S71.1 K & A Buxton, S72.1 P Hargreaves, 73.1 T Watson-Wells, S74.1 M Wells, and S75.1 J Messerly *(FS01 T Wells & FS02 H & G Nimmo – Support)*.

***Spencerville Road**, with planting buffers and building setbacks along the area's external road edges with Teapes Road, Turners Road, and Spencerville Road.*	**Have significant effects on their own or in combination with the other amendments?** The recommend ODP narrative amendments are significant and necessary to integrate the site and the activities that would be enabled by PPC23 into the surrounding environment. The importance of these treatments, including the recommended 1,000m^2 minimum lot sizes along these road frontages, needs to be given greater weight as a '*requirement*' in 8.10.31D rather than a *"design consideration"* in 8.10.31C. The addition of the Rural Waimakariri Zone recognises that this is located directly to the north of Spencerville Road where the ODP *"Rural Interface"* treatment is intended to be applied and where the minimum 1,000m^2 lot sizes are recommended to be established by Council's experts. The recommended ODP narrative amendments also assist in responding to the shortcomings identified by Ms. Smetham with the Landscape and Visual Assessment provided in support of PPC23. I reiterate that additional assessments are required to substantiate and address urban design and landscape and visual related effects (refer to paragraph 1.1.8). **Address the concerns identified in the expert evidence?** The recommended ODP narrative amendments have been identified in Ms. Smetham's landscape and visual effects evidence.[269] **Are within the scope provided for in the submissions received on PPC23?** There is scope for the recommended ODP Plan amendments as the submitters oppose PPC23 because it will increase densities that will compromise the semi-rural and rural character of the area, which need to be mitigated.[270]
Amend item 6. of the ODP narrative 8.10.31C DEVELOPMENT FORM AND DESIGN by replacing the existing narrative to deliver the urban village character that PPC23 is seeking to achieve with the following:	**The extent to which the amendments make a significant difference to the conclusions of the Section 32 evaluation?** The recommended amendments to the ODP narrative are required to address the concerns raised in submissions and the expert evidence that the ODP as notified does not:

[269] Evidence of Ms. Smetham, Appendix 6, para.154, pg. and para.171, pg.42.

[270] S01.1 J Dutkiewicz, S02.1 S Blackler, S04.1 R Watson *(FS01 T Wells – Support)*, S06.1 S & K Baker, S09.1 M Pierce, S11.1 K Foot, S14.1 SRA, S15.1 K Van de Loo, S16.1 C Howison, S19.1 M van Valkenburg, S22.1 D Elkington, S23.1 R Howison *(FS02 H & G Nimmo – Support)*, S24.1 D Lowe, S25.8 SLLT; S26.1 C Wakelin, S30.1 L Bennett, S31.1 Angela *(FS01 T Wells – Support)*, S32.1 C Elkington, S33.4 K & L Wells; S35.1 R Ennor, S36.1 H King, S38.1 N Duxbury, S39.1 A Te Ohaere-Fox, S41.1 M Gilmore, S42.1 J Knight *(FS01 T Wells – Support)*, S43.1 K Bowden, S44.1 V Knowles, S45.1 D Knight *(FS01 T Wells – Support)*, S53.1 R & K Winter, S54.1 J Lowe, S55.1 MWFT, S63.1 J Burns, S70.1 ŌRG *(FS01 T Wells & FS03 R Muschamp - Support)*, S71.1 K & A Buxton, S72.1 P Hargreaves, and S75.1 J Messerly *(FS01 T Wells & FS02 H & G Nimmo – Support)*.

6. The character is that of an urban village, set within a rural context, including the provision of a coherent ~~design~~ layout including landmark features, centrally located publicly accessible open space, ~~while providing for a~~ meaningful diversity in site size, building typologies and height, which promote visual interest, choice and opportunity for home-based business that serve the needs of the community ~~while providing for a diversity of residential building scales, types and styles~~.	• Substantiate or effectively mitigate the adverse effects of the development that would be enabled by the rezoning. • Recognise the context and character of the development that would be enabled by PPC23 as a standalone *"urban village"* or *"high amenity village."* • Establish consistency with the CDP objectives and policies, relevant national directions or RMA Part 2 matters (refer to Sections 7 and 9 of this Report). **Have significant effects on their own or in combination with the other amendments?** The recommend ODP narrative amendments are significant and necessary to deliver the village character that is sought by PPC23 but not delivered in the proposed provisions. It is important that the ODP narrative provides greater certainty on the outcomes sought as the approval of PPC23 will establish a standalone settlement within the rural environment. The recommended ODP narrative amendments also assist in responding to the shortcomings identified by Ms. Schröder with the Urban Design Assessment and identified by Ms. Smetham with the Landscape and Visual Assessment provided in support of PPC23. I reiterate that additional assessments are required to substantiate and address urban design and landscape and visual related effects (refer to paragraph 1.1.8). **Address the concerns identified in the expert evidence?** The recommended ODP narrative amendments have been identified in Ms. Schröder's urban design evidence[271] and Ms. Smetham's landscape and visual effects evidence.[272] **Are within the scope provided for in the submissions received on PPC23?** There is scope for the recommended ODP Plan amendments as the submitters oppose PPC23 because it will result in increased densities that will compromise the semi-rural and rural character of the area, which need to be mitigated.[273]

[271] Evidence of Ms. Schröder, Appendix 5, para.9 (b)(ii), pg.5.

[272] Evidence of Ms. Smetham, Appendix 6, para.87, pg.20.

[273] S01.1 J Dutkiewicz, S02.1 S Blackler, S04.1 R Watson *(FS01 T Wells – Support)*, S06.1 S & K Baker, S09.1 M Pierce, S11.1 K Foot, S14.1 SRA, S15.1 K Van de Loo, S16.1 C Howison, S19.1 M van Valkenburg, S22.1 D Elkington, S23.1 R Howison *(FS02 H & G Nimmo – Support)*, S24.1 D Lowe, S25.8 SLLT; S26.1 C Wakelin, S30.1 L Bennett, S31.1 Angela *(FS01 T Wells – Support)*, S32.1 C Elkington, S33.4 K & L Wells; S35.1 R Ennor, S36.1 H King, S38.1 N Duxbury, S39.1 A Te Ohaere-Fox, S41.1 M Gilmore, S42.1 J Knight *(FS01 T Wells – Support)*, S43.1 K Bowden, S44.1 V Knowles, S45.1 D Knight *(FS01 T Wells – Support)*, S53.1 R & K Winter, S54.1 J Lowe, S55.1 MWFT, S63.1 J Burns, S70.1 ŌRG *(FS01 T Wells & FS03 R Muschamp - Support)*, S71.1 K & A Buxton, S72.1 P Hargreaves, and S75.1 J Messerly *(FS01 T Wells & FS02 H & G Nimmo – Support)*.

Amend item b. of ODP 8.10.31.D DEVELOPMENT REQUIREMENTS 2. OPEN SPACE, RECREATION AND COMMUNITY FACILITIES by replacing the existing narrative with the following: ***b. Three Neighbourhood Parks that are each approximately 3,000m² in size are to be provided*** …	**The extent to which the amendments make a significant difference to the conclusions of the Section 32 evaluation?** The recommended amendments to the ODP narrative are required to record the approximate size of the Neighbourhood Parks. The narrative is not considered significant in the context of ensuring consistency with the objectives and policies of the CDP, CRPS and NPS's or RMA Part 2 matters. However, they are considered necessary for establishing the approximate size of the Neighbourhood Parks, consistent with the related policies and guidelines recorded in Mr. Barnes's evidence. **Have significant effects on their own or in combination with the other amendments?** The recommended amendment seeks to ensure the ODP narrative reflects Council's parks and reserves policies and guidelines but does not in itself address significant effects. **Address the concerns identified in the expert evidence?** The recommended ODP Plan amendment has been identified in Mr. Barnes's open space evidence.[274] **Are within the scope provided for in the submissions received on PPC23?** There is scope for the recommended ODP Plan amendments as the submitters oppose PPC23 because there are insufficient open space and amenities provided.[275]
Amend item c. of ODP 8.10.31.D DEVELOPMENT REQUIREMENTS 2. OPEN SPACE, RECREATION AND COMMUNITY FACILITIES by replacing the existing narrative with the following: ***c.*** … ***no larger than ~~3,000~~ 1,000m² GFA***.	**The extent to which the amendments make a significant difference to the conclusions of the Section 32 evaluation?** The recommended amendments to the ODP narrative are required to address the concerns raised in the expert evidence that the ODP as notified does not substantiate the appropriate size for the proposed Neighbourhood Centre, which may contribute to inefficient economic outcomes. **Have significant effects on their own or in combination with the other amendments?** The ODP narrative amendments are significant and necessary to ensure that the size of the proposed Neighbourhood Centre supports an efficient use of land and avoids inefficient economic outcome. The recommended ODP narrative amendments also assist in responding to the shortcomings identified by Mr. Yeoman with the Economics assessment provided in support of PPC23. I reiterate that additional assessments are required to

[274] Evidence of Mr. Barnes, Appendix 10, para.29, pg.4.

[275] S46.2 A Hicks and S51.1 G Lowe.

	substantiate and address economic effects (refer to paragraph 1.1.8). **Address the concerns identified in the expert evidence?** The recommended ODP narrative amendment has been identified in Mr. Yeoman's evidence.[276] **Are within the scope provided for in the submissions received on PPC23?** There is scope in the submissions and the alternate relief sought that an independent economic assessment is required to establish the feasibility of the Neighbourhood Centre.[277]
Add the following new requirement i. to ODP 8.10.31.D DEVELOPMENT REQUIREMENTS 2. OPEN SPACE, RECREATION AND COMMUNITY FACILITIES by adding the following sentence: ***i. Pedestrian and cycle links shall be provided to connect the site between Teapes Road and Ōuruhia Model School via Turners Road and to Spencerville via Spencerville Road***.	**The extent to which the amendments make a significant difference to the conclusions of the Section 32 evaluation?** The recommended amendments to the ODP narrative are required to address the concerns raised in submissions and the expert evidence that the ODP as notified does not: • Substantiate or effectively mitigate the adverse effects of the development that would be enabled by the rezoning. • Deliver a well-integrated and connected urban environment to the extent necessary for it to constitute a *"well-functioning urban environment."* • Establish consistency with the CDP objectives and policies, relevant national directions or RMA Part 2 matters (refer to Sections 7 and 9 of this Report). **Have significant effects on their own or in combination with the other amendments?** The recommended ODP narrative amendments are necessary to improve the accessibility to local destinations. The accessibility improvements are necessary because the approval of PPC23 would establish an isolated settlement where active modes of travel are likely to be limited. In particular, the additional pedestrian and cycling connections will support accessibility to the Neighbourhood Centre, the Pūharakekenui-Styx River, the adjacent roads, Ōuruhia Model School and Spencerville. The recommended ODP narrative amendments also assist in responding to the shortcomings identified by Mr. Smith with the ITA, and Ms. Schröder with the Urban Design Assessment provided in support of PPC23. I reiterate that additional assessments are required to substantiate and address transport, urban design and landscape and visual related effects (refer to paragraph 1.1.8).

[276] Evidence of Mr. Yeoman, Appendix 6, para.5, pg.1 & 2 and para. 95, pg.26.

[277] S75.8 J Messerly *(FS01 T Wells & FS02 H & G Nimmo – Support)*.

	Address the concerns identified in the expert evidence? The recommended ODP narrative amendments have been identified in Mr. Smith's transport evidence,[278] and Ms. Schröder's[279] urban design evidence. **Are within the scope provided for in the submissions received on PPC23?** There is scope for the recommended ODP narrative amendments as the submitters oppose PPC23 because it will give rise to poor accessibility and contribute to adverse transport effects, which need to be mitigated.[280]
Amend item c. and add a new item d. in ODP 8.10.31D DEVELOPMENT REQUIREMENTS 3. ACCESS AND TRANSPORT with the following additional narrative and formatting changes: ***c. Upgrades to the sealed width of Turners Road and Teapes Road that include the following:*** ***i. Upgrade of the Turners Road/ Marshland Road intersection to provide a left turn lane from Turners Road prior to the issue of section 224 (c) certificates for when more than 700 residential lots are created;*** ***ii. Turners Road from Spencerville Road to Marshland Road is to be upgraded to a 6.0m wide carriageway with 0.5m sealed shoulders;*** ***iii. Teapes Road is to be upgraded to a 5.5m carriageway with 0.5m sealed shoulders;*** ***iv. The Turners Road and Teapes Road transportation network upgrades shall include the squaring up of the intersection; and***	**The extent to which the amendments make a significant difference to the conclusions of the Section 32 evaluation?** The recommended amendments to the ODP narrative are required to address the concerns raised in submissions and the expert evidence that the ODP as notified does not: • Substantiate or effectively mitigate the adverse effects of the development that would be enabled by the rezoning, which are considered significant in the context of providing for a safe and efficient transport network. • Deliver a safe and efficient transport network through upgrades to the local roads and provision of technical assessments to assist in the evaluation of future subdivision applications, should PPC23 be approved. • Establish consistency with the CDP objectives and policies, relevant national directions or RMA Part 2 matters (refer to Sections 7 and 9 of this Report). **Have significant effects on their own or in combination with the other amendments?** The ODP narrative amendments are necessary to improve the transport network safety and efficiency. They will also assist in the efficient and effective administration of the CDP by prescribing the assessments that need to accompany any future subdivision application, should PPC23 be approved. The recommend narrative also assists in responding to the shortcomings identified by Mr. Smith with the ITA provided in

[278] Evidence of Mr. Smith, Appendix 11, para. 6, pg.3.

[279] Evidence of Ms. Schröder, Appendix 5, para.41 (e) to (f), pg. 16 & 17.

[280] S01.1 J Dutkiewicz, S02.1 S Blackler, S03.2 I Blackler, S04.1 R Watson *(FS01 T Wells – Support)*, S06.1 S & K Baker, S09.1 M Pierce, S10.1 D Miller, S11.1 K Foot, S14.1 SRA, S15.1 K Van de Loo, S16.1 C Howison, S17.1 T Wilson, S19.1 M van Valkenburg, S21.1 C Mitchell, S22.1 D Elkington, S23.1 R Howison *(FS02 H & G Nimmo – Support)*, S24.1 D Lowe, S26.1 C Wakelin, S27.1 A Smirnoff, S28.1 D Parker, S29.1 M Stewart, S30.1 L Bennett, S31.1 Angela *(FS01 T Wells – Support)*, S32.1 C Elkington, S34.1 D Ling *(FS01 T Wells – Support)*, S35.1 R Ennor, S36.1 H King, S37.1 M Skelly, S39.1 A Te Ohaere-Fox, S41.1 M Gilmore, S42.1 J Knight *(FS01 T Wells – Support)*, S44.1 V Knowles, S45.1 D Knight *(FS01 T Wells – Support)*, S47.1 J Burney, S48.1 B Uren, S49.1 N Hough, S51.1 G Lowe, S54.1 J Lowe, S55.1 MWFT, S57.1 J Hawkins, S62.1 A McKenzie, S63.1 J Burns, S65.1 C Faithfull, S66.1 D English, S67.1 D Gilmore, S68.1 L Maurice, S70.1 ŌRG *(FS01 T Wells & FS03 R Muschamp - Support)*, S71.1 K & A Buxton, S72.1 P Hargreaves, 73.1 T Watson-Wells, S74.1 M Wells, and S75.1 J Messerly *(FS01 T Wells & FS02 H & G Nimmo – Support)*.

v. Any land that is required to ensure the minimum sight lines are achieved as part of the Turners Road and Spencerville Road intersection upgrades to the east along Spencerville Road shall be vested in Council as public road.	support of PPC23. I reiterate that additional assessments are required to substantiate and address transport effects (refer to paragraph 1.1.8). **Address the concerns identified in the expert evidence?** The recommended ODP narrative amendments have been identified in Mr. Smith's transport evidence.[281] **Are within the scope provided for in the submissions received on PPC23?** There is scope for the recommended ODP narrative amendments as the submitters oppose PPC23 because it will give rise to adverse transport effects, which need to be mitigated.[282]
d. A Level Crossing Safety Impact Assessment (LCSIA) shall be undertaken on the Spencerville Road level crossing to the west of the site that applies the relevant KiwiRail guidance. Any transportation network improvements identified in the LCSIA, including the installation of safety barrier arms, shall be completed prior to the issue of section 224 (c) certificates.	
Add a new item d. to ODP 8.10.31D DEVELOPMENT REQUIREMENTS 4. STORMWATER, which includes the following narrative: ***d. The flood volume of the High Hazard Management Area will not be reduced.***	**The extent to which the amendments make a significant difference to the conclusions of the Section 32 evaluation?** The recommended amendments to the ODP narrative are required to address the concerns raised in submissions and the expert evidence that the ODP as notified does not: • Mitigate the adverse effects of the development that would be enabled by the rezoning, which are considered significant in the context of managing stormwater and flooding. • Substantiate or effectively mitigate the risk that flood waters and stormwater discharges may be displaced onto adjoining properties because of the development works that would be enabled by PPC23. • Establish consistency with the CDP objectives and policies, relevant national directions or RMA Part 2 matters (refer to Sections 7 and 9 of this Report).

[281] Evidence of Mr. Smith, Appendix 11, para.6, pg.3.

[282] S01.1 J Dutkiewicz, S02.1 S Blackler, S03.2 I Blackler, S04.1 R Watson *(FS01 T Wells – Support)*, S06.1 S & K Baker, S09.1 M Pierce, S10.1 D Miller, S11.1 K Foot, S14.1 SRA, S15.1 K Van de Loo, S16.1 C Howison, S17.1 T Wilson, S19.1 M van Valkenburg, S21.1 C Mitchell, S22.1 D Elkington, S23.1 R Howison *(FS02 H & G Nimmo – Support)*, S24.1 D Lowe, S26.1 C Wakelin, S27.1 A Smirnoff, S28.1 D Parker, S29.1 M Stewart, S30.1 L Bennett, S31.1 Angela (FS01 T Wells – Support), S32.1 C Elkington, S34.1 D Ling *(FS01 T Wells – Support)*, S35.1 R Ennor, S36.1 H King, S37.1 M Skelly, S39.1 A Te Ohaere-Fox, S41.1 M Gilmore, S42.1 J Knight (FS01 T Wells – Support), S44.1 V Knowles, S45.1 D Knight *(FS01 T Wells – Support)*, S47.1 J Burney, S48.1 B Uren, S49.1 N Hough, S51.1 G Lowe, S54.1 J Lowe, S55.1 MWFT, S57.1 J Hawkins, S62.1 A McKenzie, S63.1 J Burns, S65.1 C Faithfull, S66.1 D English, S67.1 D Gilmore, S68.1 L Maurice, S70.1 ŌRG *(FS01 T Wells & FS03 R Muschamp - Support)*, S71.1 K & A Buxton, S72.1 P Hargreaves, 73.1 T Watson-Wells, S74.1 M Wells, and S75.1 J Messerly *(FS01 T Wells & FS02 H & G Nimmo – Support)*.

	Have significant effects on their own or in combination with the other amendments? The ODP narrative amendments are necessary to ensure that the development that would be enabled by the approval of PPC23 does not compromise the ability for the High Hazard Management Area to continue to effectively manage stormwater and flood volumes. The recommended narrative also assists in responding to the evolving directions on natural hazard management. I reiterate that additional assessments are required to substantiate and address stormwater management effects and natural hazard risk (refer to paragraph 1.1.8). **Address the concerns identified in the expert evidence?** The recommended ODP narrative amendments have been identified in Mr. Norton's stormwater and flood evidence.[283] **Are within the scope provided for in the submissions received on PPC23?** There is scope for the recommended ODP narrative amendments as the submitters oppose PPC23 due to stormwater management effects and increased natural hazard risk, which need to be mitigated.[284]
Amend the title of ODP 8.10.31D DEVELOPMENT REQUIREMENTS 5. WATER AND WASTEWATER with the following narrative: ***5. WATER ~~SUPPLY~~ AND WASTEWATER.***	**The extent to which the amendments make a significant difference to the conclusions of the Section 32 evaluation?** The recommended amendments to the ODP narrative are required to record the required water supply and wastewater network upgrades, which are necessary to ensure the site can be effectively and efficiently serviced. The recommended amendments to the narrative are not considered significant in the context of ensuring consistency with the objectives and policies of the CDP, CRPS and NPS's or RMA Part 2 matters. However, they are necessary for ensuring the outcomes of the rezoning in respect to water and wastewater networks are realised through any subsequent consenting processes. **Have significant effects on their own or in combination with the other amendments?** The ODP narrative amendments are required to ensure the necessary servicing arrangements are established through
Amend item a. of ODP narrative in 8.10.31D DEVELOPMENT REQUIREMENTS 5. WATER SUPPLY AND WASTEWATER by replacing the existing narrative with the following: ***a. ~~A water supply network and an associated new bore and water treatment plant and potential storage facility~~ A groundwater abstraction and water treatment***	

[283] Evidence of Mr. Norton, Appendix 9, para.49 (a)(iii), pg.14.

[284] S02.1 S Blackler, S06.1 S & K Baker, S11.1 K Foot, S13.1 J Kennedy, S14.1 SRA, S16.1 C Howison, S17.1 T Wilson, S19.1 M van Valkenburg, S20.1 R Riwaka, S21.1 C Mitchell, S22.1 D Elkington, S23.1 R Howison *(FS02 H & G Nimmo – Support)*, S24.1 D Lowe, S26.2 C Wakelin, S28.1 D Parker, S29.1 M Stewart, S30.1 L Bennett, S31.1 Angela *(FS01 T Wells – Support)*, S32.1 C Elkington, S34.1 D Ling *(FS01 T Wells – Support)*, S35.1 R Ennor, S37.1 M Skelly, S41.1 M Gilmore, S42.1 J Knight *(FS01 T Wells – Support)*, S43.1 K Bowden, S45.1 D Knight *(FS01 T Wells – Support)*, S47.1 J Burney; S51.1 G Lowe, S54.1 J Lowe, S55.1 MWFT, S57.1 J Hawkins, S61.1 P McGuigan, S62.1 A McKenzie, S63.1 J Burns, S64.1 G Cockerill *(FS02 H & G Nimmo – Support)*, S65.1 C Faithfull, S68.1 L Maurice, S70.1 ŌRG *(FS01 T Wells & FS03 R Muschamp - Support)*, S71.1 K & A Buxton, S74.1 M Wells and S75.1 J Messerly *(FS01 T Wells & FS02 H & G Nimmo – Support)*.

pump station, designed and constructed in accordance with an Infrastructure Provider Agreement that incorporates Council standards and requirements, supplying into a new water supply network integrated with the Brooklands-Kainga water supply zone.	the consenting process. This includes the need for Infrastructure Provider Agreements to be formalised and ensuring that any new infrastructure and extensions and upgrades to existing services, are designed and constructed in accordance with Council's standards and requirements. **Address the concerns identified in the expert evidence?** The recommended ODP narrative amendments have been identified in Ms' McDonald's water and wastewater evidence.[285]
Amend item c. of ODP 8.10.31D DEVELOPMENT REQUIREMENTS 5. WATER SUPPLY AND WASTEWATER by replacing the existing narrative with the following: ***c. A local pressure sewer network, discharging ~~to a rising trunk sewer to be laid along~~ via a pressure main along Spencerville Road~~, over the existing bridge and then along~~ into the Lower Styx Road gravity sewer network, including odour treatment, corrosion protection and the upgrade of the ~~to pump station 78 at~~ Heyders Road Pumpstation (PC78), to be designed and constructed in accordance with an Infrastructure Provider Agreement incorporating Council standards and requirements~~in Spencerville~~.***	**Are within the scope provided for in the submissions received on PPC23?** There is scope for the recommended ODP narrative amendments as the submitters either oppose PPC23, or hold a neutral position, based on the availability of water and wastewater services and related effects, which must be effectively managed.[286]
Add a new item b. to ODP 8.10.31D DEVELOPMENT REQUIREMENTS 7. NATURAL HAZARDS, which includes the following narrative: ***b. Any fill within the existing or future floodplain shall provide compensatory storage to:*** ***i. Avoid the loss of live flood storage;***	The recommended amendments to the ODP narrative are required to address the concerns raised in submissions and the expert evidence that the ODP as notified does not: • Mitigate the adverse effects of the development that would be enabled by the rezoning, which are considered significant in the context of managing the natural hazard risks associated with flooding and tsunami events.

[285] Evidence of Ms. McDonald, Appendix 8, para. 42, pg.9 & 10.

[286] S02.1 S Blackler, S06.1 S & K Baker, S11.1 K Foot, S13.1 J Kennedy, S14.1 SRA, S16.1 C Howison, S17.1 T Wilson, S19.1 M van Valkenburg, S20.1 R Riwaka, S21.1 C Mitchell, S22.1 D Elkington, S23.1 R Howison *(FS02 H & G Nimmo – Support)*, S24.1 D Lowe, S26.2 C Wakelin, S28.1 D Parker, S29.1 M Stewart, S30.1 L Bennett, S31.1 Angela *(FS01 T Wells – Support)*, S32.1 C Elkington, S34.1 D Ling *(FS01 T Wells – Support)*, S35.1 R Ennor, S37.1 M Skelly, S41.1 M Gilmore, S42.1 J Knight *(FS01 T Wells – Support)*, S43.1 K Bowden, S45.1 D Knight *(FS01 T Wells – Support)*, S47.1 J Burney; S51.1 G Lowe, S54.1 J Lowe, S55.1 MWFT, S57.1 J Hawkins, S61.1 P McGuigan, S62.1 A McKenzie, S63.1 J Burns, S64.1 G Cockerill *(FS02 H & G Nimmo – Support)*, S65.1 C Faithfull, S68.1 L Maurice, S70.1 ŌRG *(FS01 T Wells & FS03 R Muschamp - Support)*, S71.1 K & A Buxton, S74.1 M Wells and S75.1 J Messerly *(FS01 T Wells & FS02 H & G Nimmo – Support)*.

ii. Ensure that the development will not displace ponded flood waters onto adjacent properties; and ***iii. Ensure the flood storage volume of the High Hazard Management Area is not reduced.***	• Substantiate or effectively mitigate flooding and tsunami natural hazard risks. • Establish consistency with the CDP objectives and policies, relevant national directions or RMA Part 2 matters (refer to Sections 7 and 9 of this Report). **Have significant effects on their own or in combination with the other amendments?** The ODP narrative amendments are necessary to ensure that the development that would be enabled by the approval of PPC23 does not expose existing or future residents and their properties and infrastructure to unreasonable natural hazard risks. This includes by ensuring any amened ground levels, changes to the hydrological system and infrastructure and buildings that are constructed in accordance with flood modelling that accounts for appropriate flood predictions, SLR and the impacts of climate change. The recommended narrative also assists in responding to the information requirements identified by Mr. Norton arising from the evolving national directions on natural hazard risks. I reiterate that additional assessments are required to substantiate and address natural hazard risk (refer to paragraph 1.1.8). The additional requirement for roads to be designed to facilitate safe egress during natural disasters and hazard events assists in addressing the concerns raised in submissions, including in respect to tsunami events. **Address the concerns identified in the expert evidence?** The recommended ODP narrative amendments have been identified in Mr. Norton's stormwater and flood evidence.[287] **Are within the scope provided for in the submissions received on PPC23?** There is scope for the recommended ODP narrative amendments as the submitters oppose PPC23 due to increased natural hazard risk exposure, which must be identified and mitigated.[288]
Add a new item c. to ODP 8.10.31D DEVELOPMENT REQUIREMENTS 7. NATURAL HAZARDS, which includes the following narrative: ***c. The minimum land levels for new development shall apply:*** ***i. The 1 in 200-year Max of Max flood predictions, which includes the highest series of pre-determined combinations of rainfall and tide Annual Return Intervals;*** ***ii. A 1.2m SLR (2.88m NZVD) plus any additional factor of VLM; and*** ***iii. The finished floor levels for any new dwellings are set based on this peak water level plus 400mm of vertical freeboard.***	
Add a new item d. to ODP 8.10.31D DEVELOPMENT REQUIREMENTS 7. NATURAL HAZARDS, which includes the following narrative: ***d. To allow for the safe egress and ingress of passenger vehicles in the event of an evacuation for flooding, tsunami or other natural disaster, all internal roading, including the intersections with Spencerville Road, Teapes Road and Turners Road, must be built up to a predicted flood depth***	

[287] Evidence of Mr. Norton, Appendix 9, para.49 (a)(iii), pg.14.

[288] S09.1 M Pierce, S10.1 D Miller, S11.1 K Foot, S13.1 J Kennedy, S14.1 SRA, S15.1 K Van de Loo, S16.1 C Howison, S17.1 T Wilson, S19.1 M van Valkenburg, S20.1 D Riwaka, S21.1 C Mitchell, S22.1 D Elkington, S23.1 R Howison *(FS02 H & G Nimmo – Support)*, S24.1 D Lowe, S27.1 A Smirnoff, S28.1 D Parker, S30.1 L Bennett, S32.1 C Elkington, S34.1 D Ling *(FS01 T Wells – Support)*, S35.1 R Ennor, S38.1 N Duxbury, S39.1 A Te Ohaere-Fox, S41.1 M Gilmore, S42.1 J Knight *(FS01 T Wells – Support)*, S45.1 D Knight *(FS01 T Wells – Support)*, S50.1 D McGarvey, S51.1 G Lowe, S54.1 J Lowe, S55.1 MWFT, S56.1 A Scott, S62.1 A McKenzie, S63.1 J Burns, S65.1 C Faithfull, S66.1 D English, S67.1 D Gilmore, S70.1 ŌRG *(FS01 T Wells & FS03 R Muschamp - Support)*, S72.1 P Hargreaves, 73.1 T Watson-Wells, S74.1 M Wells and S75.1 J Messerly *(FS01 T Wells & FS02 H & G Nimmo – Support)*.

that is no more that 150mm when measured at the kerb in a 1 in 50 year flood event.	

APPENDIX 3 - PPC23 - 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.

There are no proposed amendments to the changes sought to the Whisper Creek Specific Purpose Zone (Chapter 13 Specific Purpose Zone and Chapter 8 Subdivision) or to introduce the activity standard (new Chapter 8 activity standard 8.6.11) and area-specific permitted activity rule (new Chapter 14 area-specific permitted activity 14.4.3.1.1) to manage the Neighbourhood Centre.

The following lists the proposed ODP narrative in full. Amendments proposed by the Plan Change as notified are shown as underlined or 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**~~**.**

The drafting of the recommended amendments has included advice from Council's Resource Consents Team to ensure the ODP is consistent with the ODP drafting protocols to assist in the ongoing administration of the CDP should these be accepted by the Hearing Commissioner.

8.10 Appendices

Add a new Outline Development Plan and associated narrative as Appendix 8.10.31.

Amend the ODP plan to record the following recommended changes:

1. Provide pedestrian and cycle corridor connecting the site between Teapes Road and Ōuruhia School via Turners Road and to Spencerville via Spencerville Road.

2. Provide for a pedestrian and cycle corridor connecting the site to the intersection of Lower Styx Road and Spencerville Road.

3. Provide three additional pedestrian and cycle connections from the site to Turners Road and Spencerville Road from the proposed internal Collector Road near the Teapes Road intersection to the Pūharakekenui-Styx River riparian margin.

4. Provide for a more direct pedestrian and cycle connection from the amended location of the Neighbourhood Centre to the Neighbourhood Parks.

8.10.31.A CONTEXT

a. This area to the north east of Christchurch lies to the north of the **Pūharakekenui-**Styx River, one of the primary natural features of Christchurch. Prior to European settlement, the extensive wetlands and easy access to the sea made the **Pūharakekenui-**Styx an important area for mahinga kai (food gathering) and for the cultivation and harvesting of flax. The **Pūharakekenui-**Styx River forms part of the southern and eastern boundary of the neighbourhood. Surrounding areas are utilised for a mix of larger farms and smaller rural lifestyle blocks. Chaneys Forest is to the north, Bottle Lake Forest and Spencerville

are to the east, and the existing residential area and associated commercial centre of Prestons is located approximately 2km to the south.

8.10.31.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 Creating New Neighbourhood Design Guide.

8.10.31.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 main features of this area will be the **Pūharakekenui**-Styx River and a large open space area located on a lower terrace between the residential development area and the river margins.

~~**2. Where the RNN abuts or is opposite properties in the Rural Urban Fringe Zone larger section sizes are anticipatedrequired, with planting buffers and building setbacks along the area's external road edges with Teapes Road, Turners Road, and Spencerville Road.**~~

3. Higher densities are appropriate in adjacent to open space areas and/or the proposed neighbourhood centre, and active and public transport routes.

~~**4. The total yield shall not exceed 800 households consistent with the available volume of potable water and capacity of the local pressure wastewater network that form part of the supporting infrastructure to service the site.**~~

5. Pedestrian and cycle links are to be provided to link the site to local schools, Prestons, Bottle Lake Forest, and along the **Pūharakekenui**-Styx River corridor.

6. The character is that of an urban village set within a rural context, including the provision of a coherent ~~**design**~~ **layout including** landmark buildings and features, **centrally located publicly accessible open space, meaningful**~~**, while providing for a**~~ diversity ~~**of residential building scales, types and styles**~~ **in site size, building typologies and height, which promote visual interest, choice and opportunity for home based business that serve the needs of the community**.

8.10.31.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 are shown on the accompanying plan.

1. INTEGRATION

a. There are several landowners 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, pedestrian and cycle links.

b. The development is to provide new road access connections and shared paths to Teapes Road, Turners Road, and Spencerville Road.

c. The total yield shall not exceed 800 households consistent with the available volume of potable water and capacity of the local pressure wastewater network that form part of the supporting infrastructure to service the site.

d. Where the RNN abuts or is opposite properties in the Rural Urban Fringe Zone **and the Rural Waimakariri Zone** larger section sizes **are ~~anticipated~~required, including 60% of the lots be a minimum of 1,000m^2 along Turners Road and Spencerville Road**, with planting buffers and building setbacks along the area's external road edges with Teapes Road, Turners Road, and Spencerville Road.

e. Lots with frontage to Teapes Road, Turners Road, and Spencerville Road are not to obtain individual site access from these roads and shall instead obtain access from new internal roads. Open rural-style fencing is to be provided along these three external road frontages, with a 5m deep landscape strip and a 10m deep building setback. Trees planted within the landscape strip are to be maintained. **~~It is anticipated that t~~**These outcomes will be delivered via consent notices on the titles.

2. OPEN SPACE, RECREATION AND COMMUNITY FACILITIES

a. Retention of the lower terrace as a large open space area that can be utilised for a combination of pedestrian and cycle links, recreation, ecological restoration, stormwater management, and farming.

b. Three neighbourhood parks **that are each approximately 3,000m^2 in size** are to be provided to ensure that most residential units are within 500m of a park where child play facilities can be located. Where appropriate, neighbourhood parks are to be co-located with stormwater basins.

c. A Neighbourhood Centre is to be provided, where it is accessible within the residential catchment via pedestrian paths, provides a focal point for the community, and is viable. The Centre is to be commensurate with the role and function of a Neighbourhood Centre as set out in Policy 15.2.2.1 Tabel 12.1(E) and is to be no larger than **~~3~~1**,000m^2 GFA.

d. Continuation of the **Pūharakekenui-**Styx River 'Source to Sea' reserve network along the river corridor.

e. Where a pedestrian and cycle pathway is denoted, it shall be located within a corridor of a width that provides for unimpeded, safe and efficient movement of cyclists and pedestrians.

f. Pedestrian and cycle pathways are to be provided along the eastern and western edges of the site to connect the Development Area with the **Pūharakekenui-**Styx River margins.

g. Mid-block pedestrian and cycle pathways shall connect the Development Area to Turners Road and Spencerville Road.

h. A pedestrian and cycle pathway shall be provided to connect the site to **Ō**~~O~~uruhia Model School via the Styx Loop Conservation Park and a short section of Turners Road.

i. **Pedestrian and cycle links shall be provided to connect the site between Teapes Road and Ōuruhia Model School via Turners Road and to Spencerville via Spencerville Road**.

j. A pedestrian and cycle pathway shall connect the site via a bridge to Lower Styx Road and then to the intersection of Lower Styx Road and Te Korari Street at the northern entrance to Prestons. A pedestrian and cycle link to Bottle Lake Forest is also to be provided from this pathway.

3. ACCESS AND TRANSPORT

a. A collector road ~~looping t~~through the site ~~to~~**shall** provide an internal link between Turners Road and Spencerville Road.

b. A fully interconnected local road network across the site that achieves a high level of accessibility for people, including opportunities for walking, cycling and public transport.

c. Upgrades to the sealed width of Turners Road~~.~~ **and Teapes Road that include the following:**

i. Upgrade of the Turners Road/ Marshland Road intersection to provide a left turn lane from Turners Road **prior to the issue of section 224 (c) certificates** for when more than 700 residential lots are created**;**

ii. Turners Road from Spencerville Road to Marshland Road is to be upgraded to a 6.0m wide carriageway with 0.5m sealed shoulders;

iii. Teapes Road is to be upgraded to a 5.5m carriageway with 0.5m sealed shoulders;

iv. The Turners Road and Teapes Road transportation network upgrades shall include the squaring up of the intersection; and

v. Any land that is required to ensure the minimum sight lines are achieved as part of the Turners Road and Spencerville Road intersection upgrades to the east along Spencerville Road shall be vested in Council as public road.

d. **A Level Crossing Safety Impact Assessment (LCSIA) shall be undertaken on the Spencerville Road level crossing to the west of the site that applies the relevant KiwiRail guidance. Any transportation network improvements identified in the LCSIA, including the installation of safety barrier arms, shall be completed prior to the issue of section 224 (c) certificates.**

4. STORMWATER

a. A sustainable stormwater management solution for the neighbourhood integrated with open space reserves.

b. Enhancement of the habitat and ecological values of the Styx River and its margins in association with stormwater management and provision of reserves.

c. Restoration, naturalisation and ecological enhancement of Spencerville Drain.

d. **The flood volume of the High Hazard Management Area will not be reduced.**

5. WATER **SUPPLY** AND WASTEWATER

a. ~~**A water supply network and an associated new bore and water treatment plant and potential storage facility.**~~ **A groundwater abstraction and water treatment pump station, designed and constructed in accordance with an Infrastructure Provider Agreement that incorporates Council standards and requirements, supplying into a new water supply network integrated with the Brooklands-Kainga water supply zone.**

b. Sufficient water supply to meet fire-fighting requirements.

c. A local pressure sewer network, discharging ~~**to a rising trunk sewer to be laid along**~~**via a pressure main along** Spencerville Road, ~~**over the existing bridge and then along**~~ **into the** Lower Styx Road **gravity sewer network, including odour treatment, corrosion protection and the upgrade of the** ~~**to pump station 78 at**~~ Heyders Road **Pumpstation (PC78), to be designed and constructed in accordance with an Infrastructure Provider Agreement incorporating Council standards and requirements**~~**in Spencerville**~~.

6. STAGING

a. There are no staging requirements beyond those relating to the provision of infrastructure.

7. NATURAL HAZARDS

a. The land to the south of the Residential Development Area is subject to a high flood hazard risk. Activities within this area are subject to the provisions set out in Chapter 5.4.6. The area located between the Residential Development Area and Spencerville Drain is anticipated to be developed as stormwater basins and recreational space. Land located in the Rural Urban Fringe Zone is to be for farming, wetlands, stormwater basins, and recreation.

b. **Any fill within the existing or future floodplain shall provide compensatory storage to:**

i. **Avoid the loss of live flood storage;**

ii. **Ensure that the development will not displace ponded flood waters onto adjacent properties; and**

iii. **Ensure the flood storage volume of the High Hazard Management Area is not reduced.**

c. The minimum land levels for new development shall apply:

i. **The 1 in 200-year Max of Max flood predictions, which includes the highest series of pre-determined combinations of rainfall and tide Annual Return Interval.**

ii. **A 1.2m SLR (2.88m NZVD) plus any additional factor of VLM; and**

iii. **The finished floor levels for any new dwellings shall apply this peak water level plus 400mm of vertical freeboard.**

d. **To allow for the safe egress and ingress of passenger vehicles in the event of an evacuation for flooding, tsunami or other natural disaster, all internal roading, including the intersections with Spencerville Road, Teapes Road and Turners Road, must be built up to a predicted flood depth that is no more that 150mm when measured at the kerb in a 1 in 50 year flood event.**

APPENDIX 4 – TABLE OF SUBMISSIONS WITH RECOMMENDATIONS AND REASONS

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
Jason Dutkiewicz	**S01**	**S01.1**	Oppose	Adverse character and amenity effects.	**Accept** *The evidence establishes that PPC23 as notified may compromise the existing character and amenity of the area and give rise to adverse visual effects (para.5.5.19).*
				Adverse traffic effects	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
				Adverse nuisance effects	**Reject** *The CDP includes appropriate provisions to manage nuisance effects, including those relating to construction phase development works, at the time of subdivision (para.5.6.33).*
Stephanie Blackler	**S02**	**S02.1**	Oppose	Adverse transport effects	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
				Adverse nuisance effects	**Reject** *The CDP includes appropriate provisions to manage nuisance effects, including those relating to construction phase development works, at the time of subdivision (para.5.6.33).*
				Adverse character and amenity effects	**Accept** *The evidence establishes that PPC23 as notified may compromise the existing character and amenity of the area and give rise to adverse visual effects (para.5.5.19).*
				Human health – Contaminated land	**Reject** *Risks can be effectively managed by the NESCS consenting regime (para.5.8.7).*

Submitter	Submission No.	Decision No.	Request	Decision Sought		Recommendation and Reasons
				Groundwater contamination		**Reject** *The evidence establishes that groundwater quality would not be compromised (para.5.6.12).*
Ian Blackler	**S03**	**S03.1**	Oppose	Adverse nuisance effects		**Reject** *The CDPCDP includes appropriate provisions to manage nuisance effects, including those relating to construction phase development works, at the time of subdivision (para.5.6.33).*
		S03.2	Oppose	Adverse transport effects		**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
Rowena Watson	**S04**	**S04.1**	Oppose	Adverse effects on cultural values		**Reject** *No sites of interest have been identified, it is a highly modified site, and standard discovery protocols can manage the discovery of sites or values of interest (para.5.10.5).*
				Adverse transport effects		**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
				Adverse character and amenity effects		**Accept** *The evidence establishes that PPC23 as notified may compromise the existing character and amenity of the area and give rise to adverse visual effects (para.5.5.19).*
			Further submission No.	**Further Submitter**	**Support / Oppose**	
			FS01	T Wells	*Support*	**Accept and reject** *Reasons as above*.
		S04.2	Oppose	Alternate relief – If approved the subdivision is limited to 165 houses and other design controls		**Reject** *The additional development controls aren't supported by the evidence (para.5.5.20).*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
				Alternate relief – The bridge is reinstated to Lower Styx Road	**Accept in part** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20). A road connection to Lower Styx Road is listed as an item in paragraph 1.1.8 for the Proponent to investigate.*
				Alternate relief – Additional pathways along Turners Road	**Accept** *PPC23 as notified does not support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
				Alternate relief – Low-level lighting	**Reject** *The CDP includes appropriate provisions to manage nuisance effects, including light spill, at the time of subdivision (para.5.6.33).*
Colin Shaw	**S05**	**S05.1**	Neither support nor oppose	Adverse character and amenity effects	**Accept in part** *The evidence establishes that PPC23 as notified may compromise the existing character and amenity of the area and give rise to adverse visual effects (para.5.5.19).*
Steven and Kay Baker	**S06**	**S06.1**	Oppose	Water capacity and quality	**Reject** *The evidence establishes that the site can be serviced with potable water and reticulated wastewater connections (para.5.6.12).*
				Adverse character and amenity effects	**Accept** *The evidence establishes that PPC23 as notified may compromise the existing character and amenity of the area and give rise to adverse visual effects (para.5.5.19).*
				Adverse transport effects	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
				Adverse nuisance effects	**Reject** *The CDP includes appropriate provisions to manage nuisance effects, including those relating to construction phase development works, at the time of subdivision (para.5.6.33).*
				Insufficient utility service capacity	**Reject** *The standard subdivision process requires that power and telecommunication services are installed prior to records of title being issued (para.5.6.24).*
Dennis and Karen Casey	**S07**	**S07.1**	Support	Supports growth at the Ōuruhia Model School	**Accept** *The additional population base will support the school (para.5.6.38).*
				Positive transport effects	**Reject** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
				Support future reserve provision	**Accept** *The evidence establishes that appropriate provision has been made for Neighbourhood Parks (para.5.6.27).*
				Support future community facility provision	**Accept** *The additional population base will support the school (para.5.6.38), local amenities (para.5.6.39) and reserves (para.5.10.7).*
Carl Lange - True Form Building Ltd (TFBL)	**S08**	**S08.1**	Support	Support housing supply and choice	**Accept in part** *The additional housing capacity will be provided to support supply and choice, but additional assessments are required to substantiate the economic costs and benefits (para.5.4.19 & para.5.4.20).*
				Appropriate location	**Reject** *The evidence establishes that PPC23 as notified does not represent a "well-functioning urban environment" under the NPS-UD (para.5.3.13, 5.3.14 & para.6.3.18).*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
				Support future reserve provision	**Accept** *The additional population base will support the provision of Neighbourhood parks (para.5.6.27).*
Mel Pierce	**S09**	**S09.1**	Oppose	Adverse effects on the river and habitats	**Reject** *The evidence establishes that the ODP provides opportunities to enhance habitats within the site to support ecology, natural values and birdlife that would contribute to the natural values of the wider area (para.5.10.7).*
				Adverse character and amenity effects	**Accept** *The evidence establishes that PPC23 as notified may compromise the existing character and amenity of the area and give rise to adverse visual effects (para.5.5.19).*
				Adverse transport effects	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
				Property impacts	**Reject** *There is no RMA scope to consider the impacts of the rezoning on property values, insurance premiums, maintenance costs or LGA rates increases (para.5.11.4 to 5.11.7).*
				Natural hazard risks	**Accept** *PPC23 as notified does not address the concerns raised in the evidence that the natural hazard risks have been identified and can be effectively mitigated (para.5.8.14 & 5.8.19).*
Daniel Miller	**S10**	**S10.0**	Oppose	Adverse transport effects	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
				Flood risk	**Accept** *PPC23 as notified does not address the concerns raised in the evidence that the natural hazard risks have been identified and can be effectively mitigated (para.5.8.19).*
				Property impacts	**Reject** *There is no RMA scope to consider the impacts of the rezoning on property values, insurance premiums, maintenance costs or LGA rates increases (para.5.11.4 to 5.11.7).*
Kim Foot	**S11**	**S11.1**	Oppose	Adverse character and amenity effects	**Accept** *The evidence establishes that PPC23 as notified may compromise the existing character and amenity of the area and give rise to adverse visual effects (para.5.5.19).*
				Flood risk	**Accept** *PPC23 as notified does not address the concerns raised in the evidence that the natural hazard risks have been identified and can be effectively mitigated (para.5.8.19).*
				Water and wastewater capacity	**Reject** *The evidence establishes that the site can be serviced with potable water and reticulated wastewater connections (para.5.6.12).*
				Adverse transport effects	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
Anthony Greaves	**S12**	**S12.1**	Support	Positive character and amenity effects	**Reject** *The evidence establishes that PPC23 as notified may compromise the existing character and amenity of the area and give rise to adverse visual effects (para.5.5.19).*
				SRA are not representative of the community	**Reject** *The SRA has a legitimate right to submit on PPC23 (para.5.2.3).*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
John Kennedy	**S13**	**S13.1**	Oppose	Flood risk	**Accept** *PPC23 as notified does not address the concerns raised in the evidence that the natural hazard risks have been identified and can be effectively mitigated (para.5.8.19).*
				Adverse character and amenity effects	**Accept** *The evidence establishes that PPC23 as notified may compromise the existing character and amenity of the area and give rise to adverse visual effects (para.5.5.19).*
				Water and wastewater capacity	**Reject** *The evidence establishes that the site can be serviced with potable water and reticulated wastewater connections (para.5.6.12).*
Spencerville Residents Association (SRA)	**S14**	**S14.1**	Oppose	Adverse traffic effects	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
				Tsunami and flood risk	**Accept** *PPC23 as notified does not address the concerns raised in the evidence that the natural hazard risks have been identified and can be effectively mitigated (para.5.8.19).*
				Water and wastewater capacity	**Reject** *The evidence establishes that the site can be serviced with potable water and reticulated wastewater connections (para.5.6.12).*
				Stormwater management	**Accept** *PPC23 as notified does not establish how stormwater can be effectively managed or that any related adverse effects can be effectively mitigated (para.5.8.18 & para. 5.8.19).*
				Adverse effects on the river and habitats	**Reject** *The evidence establishes that the ODP provides opportunities to enhance habitats within the site to support ecology, natural values and birdlife that would contribute to the natural values of the wider area (para.5.10.7).*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
				Character and amenity effects	**Accept** *The evidence establishes that PPC23 as notified may compromise the existing character and amenity of the area and give rise to adverse visual effects (para.5.5.19).*
				Economic sufficiency and feasibility	**Reject in part** *The additional housing capacity will be provided to support supply and choice, but additional assessments are required to substantiate the economic costs and benefits (para.5.4.19 & para.5.4.20).*
				Human health - Radio transmission emissions	**Reject** *The risks to human health are being effectively managed through the consents and national standards that in place to manage the operation of the Ōuruhia transmission site (para.5.8.8).*
				Adverse nuisance effects	**Reject** *CDP includes appropriate provisions to manage nuisance effects, including those relating to construction phase development works, at the time of subdivision (para.5.6.33).*
				Adverse reverse sensitivity effects	**Reject** *Any reverse sensitivity effects on rural activities would be avoided by the site context and ODP requirements (para.5.9.7 to 5.9.9) and on the Ōuruhia transmission site by the conditions granted to the network utility provider (para.5.9.10).*
				Adverse effects on cultural values	**Reject** *No sites of interest have been identified, it is a highly modified site, and standard discovery protocols can manage the discovery of sites or values of interest (para.5.10.5).*
				Compromised social wellbeing	**Reject** *The effects cannot be quantified and would be managed outside of the RMA (para.5.11.8).*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
				Human health – Contaminated land	**Reject** *The risks to human health can be effectively managed by the NESCS consenting regime (para.5.8.7).*
				Insufficient consultation	**Reject** *There is no duty for the Proponent to consult with landowners or mana whenua (para.5.2.4).*
		S14.2	Oppose	Alternate relief – Archaeological study required	**Reject** *There are no sites of interest identified, highly modified site and standard discovery protocols can manage the discovery of sites or values of interest (para.5.10.5).*
		S14.3	Oppose	Alternate relief – Contaminated land assessment required	**Reject** *Any risks to human health from contaminated soils can be effectively managed by the NESCS consenting regime (para.5.8.7).*
		S14.3	Oppose	Alternate relief – Land development management	**Accept in part** *The CDP includes appropriate provisions to manage nuisance effects, including those relating to construction phase development works, at the time of subdivision (para.5.6.33).*
Kerryanne Van de Loo	**S15**	**S15.1**	Oppose	Flood risk	**Accept** *PPC23 as notified does not address the concerns raised in the evidence that the natural hazard risks have been identified and can be effectively mitigated (para.5.8.19).*
				Adverse transport effects	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
				Character and amenity	**Accept** *The evidence establishes that PPC23 as notified may compromise the existing character and amenity of the area and give rise to adverse visual effects (para.5.5.19).*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
Cora Howison	**S16**	**S16.1**	Oppose	Adverse transport effects	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
				Tsunami and flood risk	**Accept** *PPC23 as notified does not address the concerns raised in the evidence that the natural hazard risks have been identified and can be effectively mitigated (para.5.8.19).*
				Character and amenity	**Accept** *The evidence establishes that PPC23 as notified may compromise the existing character and amenity of the area and give rise to adverse visual effects (para.5.5.19).*
				Adverse effects on the river	**Reject** *The evidence establishes that the ODP provides opportunities to enhance habitats within the site to support ecology, natural values and birdlife that would contribute to the natural values of the wider area (para.5.10.7).*
				Water capacity	**Reject** *The evidence establishes that the site can be serviced with potable water (para.5.6.12).*
Tony Wilson	**S17**	**S17.1**	Oppose	Adverse transport effects	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
				Water and wastewater capacity and quality	**Reject** *The evidence establishes that the site can be serviced with potable water and reticulated wastewater connections (para.5.6.12).*
				Natural hazard risk – Tsunami evacuation	**Accept in part** *There is sufficient network capacity to ensure traffic heading inland will be able to make a timely evacuation and ODP requirement for road designs to support safe egress during hazard events (para.5.7.10 and Appendix 3).*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
				Tsunami and flood risk	**Accept** *PPC23 as notified does not address the concerns raised in the evidence that the natural hazard risks have been identified and can be effectively mitigated (para.5.8.19).*
Zhongyu Duan	**S18**	**S18.1**	Neither support nor oppose	ITA to be submitted and approved	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20). The Proponent has been requested to provide an updated ITA (paragraph 1.1.8).*
				Developer funded transport upgrades	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20). The Proponent has been requested to provide an updated ITA (paragraph 1.1.8), which will assist in establishing the network upgrades that are to be developer funded.*
				Adherence to water management requirements	**Accept in part** *The evidence establishes that the site can be serviced with potable water (para.5.6.12) and future consenting processes would manage any related effects on the water resource.*
				Groundwater monitoring plan required	**Accept in part** *The evidence establishes that the site can be serviced with potable water and reticulated wastewater connections (para.5.6.12) and future consenting processes would monitor groundwater.*
				Minimum 10m to 20m riparian margin	**Accept in part** *Any future subdivision process would establish the riparian margin to be vested as esplanade reserve (para.5.10.7).*
Marcus van Valkenburg	**S19**	**S19.1**	Oppose	Adverse traffic effects	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
				Tsunami and flood risk	**Accept** *PPC23 as notified does not address the concerns raised in the evidence that the natural hazard risks have been identified and can be effectively mitigated (para.5.8.19).*
				Water and wastewater capacity	**Reject** *The evidence establishes that the site can be serviced with potable water and reticulated wastewater connections (para.5.6.12).*
				Stormwater management	**Accept** *PPC23 as notified does not establish how stormwater can be effectively managed or that any related adverse effects can be effectively mitigated (para.5.8.18 & para. 5.8.19).*
				Adverse effects on the river and habitats	**Reject** *The evidence establishes that the ODP provides opportunities to enhance habitats within the site to support ecology, natural values and birdlife that would contribute to the natural values of the wider area (para.5.10.7).*
				Character and amenity effects	**Accept** *The evidence establishes that PPC23 as notified may compromise the existing character and amenity of the area and give rise to adverse visual effects (para.5.5.19).*
				Economic sufficiency and feasibility	**Reject in part** *Additional housing capacity will be provided to support supply and choice, but additional assessments are required to substantiate the economic costs and benefits (para.5.4.19 & para.5.4.20).*
				Human health – Contaminated land	**Reject** *Any risks to human health can be effectively managed by the NESCS consenting regime (para.5.8.7).*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
				Human health - Radio transmission emissions	**Reject** *Any risks to human health are being effectively managed through the consents and national standards that in place to manage the operation of the Ōuruhia transmission site (para.5.8.8).*
				Adverse nuisance effects	**Reject** *The CDP includes appropriate provisions to manage nuisance effects, including those relating to construction phase development works, at the time of subdivision (para.5.6.33).*
				Adverse effects on cultural values	**Reject** *No sites of interest have been identified, it is a highly modified site, and standard discovery protocols can manage the discovery of sites or values of interest (para.5.10.5).*
				Adverse reverse sensitivity effects	**Reject** *Any reverse sensitivity effects on rural activities would be avoided by the site context and ODP requirements (para.5.9.7 to 5.9.9) and on the Ōuruhia transmission site by the conditions granted to the network utility provider (para.5.9.10).*
				Compromised social wellbeing	**Reject** *The effects cannot be quantified and would be managed outside of the RMA (para.5.11.8).*
				Insufficient consultation	**Reject** *There is no duty for the Proponent to consult with landowners or mana whenua (para.5.2.4).*
		S19.2	Oppose	Alternate relief – Archaeological study required	**Reject** *No sites of interest identified, highly modified site and standard discovery protocols can manage the discovery of sites or values of interest (para.5.10.5).*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
		S19.3	Oppose	Alternate relief – Contaminated land assessment required	**Reject** *Risks to human health from contaminated soils can be effectively managed by the NESCS consenting regime (para.5.8.7).*
		S19.4	Oppose	Alternate relief – Land development management	**Accept in part** *The CDP includes appropriate provisions to manage nuisance effects, including those relating to construction phase development works, at the time of subdivision (para.5.6.33).*
Deanna Riwaka	**S20**	**S20.1**	Oppose	Flood risk	**Accept** *PPC23 as notified does not address the concerns raised in the evidence that the natural hazard risks have been identified and can be effectively mitigated (para.5.8.19).*
				Adverse effects on cultural values	**Reject** *No sites of interest have been identified, it is a highly modified site, and standard discovery protocols can manage the discovery of sites or values of interest (para.5.10.5).*
				Property impacts - Rates	**Reject** *There is no RMA scope to consider the impacts of the rezoning on property values, insurance premiums, maintenance costs or LGA rates increases (para.5.11.4 to 5.11.7).*
				Water quality	**Reject** *The evidence establishes that the site can be serviced with potable water (para.5.6.12).*
				Adverse effects on the river and habitats	**Reject** *The evidence establishes that the ODP provides opportunities to enhance habitats within the site to support ecology, natural values and birdlife that would contribute to the natural values of the wider area (para.5.10.7).*
				Insufficient consultation	**Reject** *There is no duty for the Proponent to consult with landowners or mana whenua (para.5.2.4).*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
Colin Mitchell	**S21**	**S21.1**	Oppose	Adverse transport effects	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
				Water capacity	**Reject** *The evidence establishes that the site can be serviced with potable water (para.5.6.12).*
				Stormwater management	**Accept** *PPC23 as notified does not establish how stormwater can be effectively managed or that any related adverse effects can be effectively mitigated (para.5.8.18 & para. 5.8.19).*
				Flood risk	**Accept** *PPC23 as notified does not address the concerns raised in the evidence that the natural hazard risks have been identified and can be effectively mitigated (para.5.8.19).*
David Elkington	**S22**	**S22.1**	Oppose	Adverse character and amenity effects	**Accept** *The evidence establishes that PPC23 as notified may compromise the existing character and amenity of the area and give rise to adverse visual effects (para.5.5.19).*
				Water and wastewater capacity	**Reject** *The evidence establishes that the site can be serviced with potable water and reticulated wastewater connections (para.5.6.12).*
				Stormwater management	**Accept** *PPC23 as notified does not establish how stormwater can be effectively managed or that any related adverse effects can be effectively mitigated (para.5.8.18 & para. 5.8.19).*
				Adverse transport effects	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
				Adverse natural values effects	**Reject** *The evidence establishes that the ODP provides opportunities to enhance habitats within the site to support ecology, natural values and birdlife that would contribute to the natural values of the wider area (para.5.10.7).*
				Adverse effects on cultural values	**Reject** *No sites of interest have been identified, it is a highly modified site, and standard discovery protocols can manage the discovery of sites or values of interest (para.5.10.5).*
				Insufficient consultation	**Reject** *There is no duty for the Proponent to consult with landowners or mana whenua (para.5.2.4).*
				Insufficient technical assessments	**Accept** *The additional technical assessments listed in paragraph 1.1.8 are required to substantiate the effects of the rezoning and establish appropriate mitigation where necessary (para.5.2.5).*
				Flood risks	**Accept** *PPC23 as notified does not address the concerns raised in the evidence that the natural hazard risks have been identified and can be effectively mitigated (para.5.8.19).*
				Economic sufficiency and feasibility	**Reject in part** *Additional housing capacity will be provided to support supply and choice, but additional assessments are required to substantiate the economic costs and benefits (para.5.4.19 & para.5.4.20).*
				Human health risks – Radio transmission emissions	**Reject** *Any risks to human health are being effectively managed through the consents and national standards that in place to manage the operation of the Ōuruhia transmission site (para.5.8.8).*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
				Human health risks – Contaminated land	**Reject** *Any risks to human health can be effectively managed by the NESCS consenting regime (para.5.8.7).*
				Lack of reserves and community facilities	**Reject** *The additional population base will support the school (para.5.6.38), local amenities (para.5.6.39) and reserves (para.5.10.7).*
				Property impacts – Equity	**Reject** *There is no RMA scope to consider the impacts of the rezoning on property values, insurance premiums, maintenance costs or LGA rates increases (para.5.11.4 to 5.11.7).*
				Compromised social wellbeing	**Reject** *The effects cannot be quantified and would be managed outside of the RMA (para.5.11.8).*
Renee Howison	**S23**	**S23.1**	Oppose	Adverse traffic effects	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
				Tsunami and flood risk	**Accept** *PPC23 as notified does not address the concerns raised in the evidence that the natural hazard risks have been identified and can be effectively mitigated (para.5.8.19).*
				Water and wastewater	**Reject** *The evidence establishes that the site can be serviced with potable water and reticulated wastewater connections (para.5.6.12).*
				Stormwater management (capacity)	**Accept** *PPC23 as notified does not establish how stormwater can be effectively managed or that any related adverse effects can be effectively mitigated (para.5.8.18 & para. 5.8.19).*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
				Adverse effects on the river and habitats	**Reject** *The evidence establishes that the ODP provides opportunities to enhance habitats within the site to support ecology, natural values and birdlife that would contribute to the natural values of the wider area (para.5.10.7).*
				Character and amenity effects	**Accept** *The evidence establishes that PPC23 as notified may compromise the existing character and amenity of the area and give rise to adverse visual effects (para.5.5.19).*
				Economic sufficiency and feasibility	**Reject in part** *Additional housing capacity will be provided to support supply and choice, but additional assessments are required to substantiate the economic costs and benefits (para.5.4.19 & para.5.4.20).*
				Human health - Radio transmission emissions	**Reject** *Any risks to human health are being effectively managed through the consents and national standards that in place to manage the operation of the Ōuruhia transmission site (para.5.8.8).*
				Adverse nuisance effects	**Reject** *The CDP includes appropriate provisions to manage nuisance effects, including those relating to construction phase development works, at the time of subdivision (para.5.6.33).*
				Adverse effects on cultural values	**Reject** *No sites of interest have been identified, it is a highly modified site, and standard discovery protocols can manage the discovery of sites or values of interest (para.5.10.5).*
				Human health – Contaminated land	**Reject** *Any risks to human health can be effectively managed by the NESCS consenting regime (para.5.8.7).*

Submitter	Submission No.	Decision No.	Request	Decision Sought		Recommendation and Reasons
				Adverse reverse sensitivity effects		**Reject** *Any reverse sensitivity effects on rural activities would be avoided by the site context and ODP requirements (para.5.9.7 to 5.9.9) and on the Ōuruhia transmission site by the conditions granted to the network utility provider (para.5.9.10).*
				Compromised social wellbeing		**Reject** *The effects cannot be quantified and would be managed outside of the RMA (para.5.11.8).*
				Insufficient consultation		**Reject** *There is no duty for the Proponent to consult with landowners or mana whenua (para.5.2.4).*
			Further submission No.	**Further Submitter**	**Support / Oppose**	
			FS02	H & G Nimmo	*Support*	**Accept, accept in part and reject** *Refer to reasons above.*
		S23.2	Oppose	Alternate relief – Archaeological study required		**Reject** *No sites of interest identified, highly modified site and standard discovery protocols can manage the discovery of sites or values of interest (para.5.10.5).*
		S23.3	Oppose	Alternate relief – Contaminated land assessment required		**Reject** *Any risks to human health from contaminated soils can be effectively managed by the NESCS consenting regime (para.5.8.7).*
		S23.4	Oppose	Alternate relief – Land development management		**Accept in part** *The CDP includes appropriate provisions to manage nuisance effects, including those relating to construction phase development works, at the time of subdivision (para.5.6.33).*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
Dominic Lowe	**S24**	**S24.1**	Oppose	Adverse transport effects	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
				Adverse nuisance effects	**Reject** *The CDP includes appropriate provisions to manage nuisance effects, including those relating to construction phase development works, at the time of subdivision (para.5.6.33).*
				Adverse character and amenity effects	**Accept** *The evidence establishes that PPC23 as notified may compromise the existing character and amenity of the area and give rise to adverse visual effects (para.5.5.19).*
				Property impacts- Rates	**Reject** *There is no RMA scope to consider the impacts of the rezoning on property values, insurance premiums, maintenance costs or LGA rates increases (para.5.11.4 to 5.11.7).*
				Water and wastewater capacity	**Reject** *The evidence establishes that the site can be serviced with potable water and reticulated wastewater connections (para.5.6.12).*
				Stormwater management	**Accept** *PPC23 as notified does not establish how stormwater can be effectively managed or that any related adverse effects can be effectively mitigated (para.5.8.18 & para. 5.8.19).*
				Flood risk	**Accept** *PPC23 as notified does not address the concerns raised in the evidence that the natural hazard risks have been identified and can be effectively mitigated (para.5.8.19).*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
		24.2	Oppose	If approved, mitigate adverse transport effects	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
				If approved, mitigate adverse nuisance effects	**Accept in part** *The CDP includes appropriate provisions to manage nuisance effects, including those relating to construction phase development works, at the time of subdivision (para.5.6.33).*
				If approved, mitigate adverse character and amenity effects	**Accept** *The evidence establishes that PPC23 as notified may compromise the existing character and amenity of the area and give rise to adverse visual effects (para.5.5.19).*
				If approved, mitigate property impacts- Rates	**Reject** *There is no RMA scope to consider the impacts of the rezoning on property values, insurance premiums, maintenance costs or LGA rates increases (para.5.11.4 to 5.11.7).*
				If approved, mitigate water and wastewater capacity constraints	**Reject** *The evidence establishes that the site can be serviced with potable water and reticulated wastewater connections (para.5.6.12).*
				If approved, effectively manage stormwater	**Accept** *PPC23 as notified does not establish how stormwater can be effectively managed or that any related adverse effects can be effectively mitigated (para.5.8.18 & para. 5.8.19).*
				If approved, mitigate flood risk	**Accept** *Additional technical assessments are required to identify and effectively mitigate natural hazard risks have been identified and can be effectively mitigated (para. 5.8.14, para.5.8.19 & para.5.8.21).*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
Selena May Coombe - Styx Living Laboratory Trust (SLLT)	**S25**	**25.1**	Support	Extensive riparian margin	**Accept** *Any future subdivision process would establish the riparian margin to be vested as esplanade reserve (para.5.10.7).*
				Additional reserves and stormwater management facilities	**Accept in part** *The ODP makes appropriate provision of reserves (para.5.6.27).* *PPC23 as notified does not establish how stormwater can be effectively managed or that any related adverse effects can be effectively mitigated (para.5.8.18 & para. 5.8.19).*
				Improved accessibility	**Accept** *Facilitates access to the Pūharakekenui-Styx River corridor and requires ecological restoration to occur (para.5.10.6).*
		25.2	Neither support nor oppose	Partnership agreement with Trust	**Reject** *The relief is not within the scope of this process (para.5.10.7).*
		25.3	Neither support nor oppose	Avian plan development and implementation	**Reject** *The evidence does not establish the need for additional development controls to protect natural values (para.5.10.7).*
		25.4	Neither support nor oppose	Intermittent stormwater management areas managed	**Accept** *PPC23 as notified does not establish how stormwater can be effectively managed or that any related adverse effects can be effectively mitigated (para.5.8.18 & para. 5.8.19).*
		25.5	Neither support nor oppose	Sediment discharge management	**Accept** *PPC23 as notified does not establish how stormwater can be effectively managed or that any related adverse effects can be effectively mitigated (para.5.8.18 & para. 5.8.19).*
		25.6	Neither support nor oppose	Lizard management plan development and implementation	**Reject** *The CDP includes appropriate provisions to manage lizards if they are determined to be present on the site at the time of subdivision (para.5.6.33).*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
		25.7	Neither support nor oppose	Mitigate nuisance effects – Light spill	**Reject** *The CDP includes appropriate provisions to manage nuisance effects, including light spill, at the time of subdivision (para.5.6.33).*
		25.8	Neither support nor oppose	Retain 5m landscape strip	**Accept in part** *The expert evidence establishes that PPC23 as notified may compromise the existing character and amenity of the area and give rise to adverse visual effects (para.5.5.19).*
		25.9	Neither support nor oppose	Monitoring programme development and implementation	**Reject** *The CDP includes appropriate provisions to manage nuisance effects, including monitoring programme to manage construction phase works, at the time of subdivision (para.5.6.33).*
		25.10	Neither support nor oppose	Wildlife signage	**Accept in part** *Signage to assist in managing driver behaviour would be determined through the subdivision process (para.5.7.9).*
		25.11	Neither support nor oppose	Boundary fencing requirements	**Reject** *The evidence does not establish the need for additional development controls, and the relief is not within the scope of this process (para.5.10.7).*
Craig Wakelin	**S26**	**S26.1**	Oppose	Adverse transport effects	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
				Nuisance effects – Light spill	**Reject** *The CDP includes appropriate provisions to manage nuisance effects, including light spill (para.5.6.33).*
				Property impacts	**Reject** *There is no RMA scope to consider the impacts of the rezoning on property values, insurance premiums, maintenance costs or LGA rates increases (para.5.11.4 to 5.11.7).*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
		26.2	Oppose	Stormwater management	**Accept** *PPC23 as notified does not establish how stormwater can be effectively managed or that any related adverse effects can be effectively mitigated (para.5.8.18 & para. 5.8.19).*
Alexander Smirnoff	**S27**	**S27.1**	Oppose	Flood and tsunami risk	**Accept** *PPC23 as notified does not address the concerns raised in the evidence that the natural hazard risks have been identified and can be effectively mitigated (para.5.8.19).*
				Natural hazard risk – Tsunami evacuation	**Accept in part** *There is sufficient network capacity to ensure traffic heading inland will be able to make a timely evacuation and ODP requirement for road designs to support safe egress during hazard events (para.5.7.10 and Appendix 3).*
				Geotechnical risk	**Accept** *PPC23 as notified does not address the concerns raised in the evidence that the natural hazard risks have been identified and can be effectively mitigated (para.5.8.14).*
				Stormwater management	**Accept** *PPC23 as notified does not establish how stormwater can be effectively managed or that any related adverse effects can be effectively mitigated (para.5.8.18 & para. 5.8.19).*
				Adverse transport effects	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
				Property impacts - Rates	**Reject** *There is no RMA scope to consider the impacts of the rezoning on property values, insurance premiums, maintenance costs or LGA rates increases (para.5.11.4 to 5.11.7).*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
David Parker	**S28**	**S28.1**	Oppose	Flood risk	**Accept** *PPC23 as notified does not address the concerns raised in the evidence that the natural hazard risks have been identified and can be effectively mitigated (para.5.8.19).*
				Adverse transport effects	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
				Property impacts – Rates	**Reject** *There is no RMA scope to consider the impacts of the rezoning on property values, insurance premiums, maintenance costs or LGA rates increases (para.5.11.4 to 5.11.7).*
				Adverse effects on natural values	**Reject** *The evidence establishes that the ODP provides opportunities to enhance habitats within the site to support ecology, natural values and birdlife that would contribute to the natural values of the wider area (para.5.10.7).*
Marcus Stewart	**S29**	**S29.1**	Oppose	Property impacts – Rates	**Reject** *There is no RMA scope to consider the impacts of the rezoning on property values, insurance premiums, maintenance costs or LGA rates increases (para.5.11.4 to 5.11.7).*
				Adverse transport effects	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
				Adverse effects on community facilities - School	**Reject** *The additional population base will support the school (para.5.6.38) and local amenities (para.5.6.39).*
				Wastewater capacity	**Reject** *The evidence establishes that the site can be serviced with reticulated wastewater connections (para.5.6.12).*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
		S29.2	Oppose	Alternate relief – ITA	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8). Updated to the Novogroup ITA are listed in paragraph 1.1.8.*
				Alternate relief – Wastewater capacity assessment	**Reject** *The evidence establishes that the site can be serviced with reticulated wastewater connections (para.5.6.12).*
Lee Bennett	**S30**	**S30.1**	Oppose	Adverse effects on character and amenity	**Accept** *The evidence establishes that PPC23 as notified may compromise the existing character and amenity of the area and give rise to adverse visual effects (para.5.5.19).*
				Adverse transport effects	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
				Water and wastewater capacity	**Reject** *The evidence establishes that the site can be serviced with potable water and reticulated wastewater connections (para.5.6.12).*
				Flood risk	**Accept** *PPC23 as notified does not address the concerns raised in the evidence that the natural hazard risks have been identified and can be effectively mitigated (para.5.8.19).*
				Stormwater management	**Accept** *PPC23 as notified does not establish how stormwater can be effectively managed or that any related adverse effects can be effectively mitigated (para.5.8.18 & para. 5.8.19).*
				Adverse effects on natural values	**Reject** *The evidence establishes that the ODP provides opportunities to enhance habitats within the site to support ecology, natural values and birdlife that would contribute to the natural values of the wider area (para.5.10.7).*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
				Compromised social wellbeing	**Reject** *The effects cannot be quantified and would be managed outside of the RMA (para.5.11.8).*
				Adverse reverse sensitivity effects	**Reject** *Any reverse sensitivity effects on rural activities would be avoided by the site context and ODP requirements (para.5.9.7 to 5.9.9) and on the Ōuruhia transmission site by the conditions granted to the network utility provider (para.5.9.10).*
				Adverse nuisance effects	**Reject** *The CDP includes appropriate provisions to manage nuisance effects, including those relating to construction phase development works, at the time of subdivision (para.5.6.33).*
				Economic sufficiency and feasibility	**Reject in part** *Additional housing capacity will be provided to support supply and choice, but additional assessments are required to substantiate the economic costs and benefits (para.5.4.19 & para.5.4.20).*
				Human health risks – Radio transmission emissions	**Reject** *Any risks to human health are being effectively managed through the consents and national standards that in place to manage the operation of the Ōuruhia transmission site (para.5.8.8).*
				Human health risks – Contaminated land	**Reject** *Any risks to human health can be effectively managed by the NESCS consenting regime (para.5.8.7).*
				Adverse cultural values effects	**Reject** *There are no sites of interest have been identified, it is a highly modified site, and standard discovery protocols can manage the discovery of sites or values of interest (para.5.10.5).*

Submitter	Submission No.	Decision No.	Request	Decision Sought		Recommendation and Reasons
Angela	**S31**	**S31.1**	Oppose	Adverse character and amenity effects		**Accept** *The evidence establishes that PPC23 as notified may compromise the existing character and amenity of the area and give rise to adverse visual effects (para.5.5.19).*
				Adverse effects on the river and habitats		**Reject** *The evidence establishes that the ODP provides opportunities to enhance habitats within the site to support ecology, natural values and birdlife that would contribute to the natural values of the wider area (para.5.10.7).*
				Adverse nuisance effects – Dust, noise and vibration		**Reject** *The CDP includes appropriate provisions to manage nuisance effects, including dust, noise and vibration, at the time of subdivision (para.5.6.33).*
				Water and wastewater capacity		**Reject** *The evidence establishes that the site can be serviced with potable water and reticulated wastewater connections (para.5.6.12).*
				Adverse transport effects		**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
			Further submission No.	**Further Submitter**	**Support / Oppose**	
			FS01	T Wells	*Support*	**Accept and reject** *Reasons as above*.
Caitlin Elkington	**S32**	**S32.1**	Oppose	Adverse Precedent effects		**Reject** *Precedent effects don't apply to rezonings and the SPRZ is sufficient unique to ensure that the approval of PPC23 would compromise the integrity of the CDP (para.5.3.15).*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
				Inconsistent with Ōtautahi Christchurch's urban form	**Accept** *The evidence establishes that PPC23 as notified does not represent a "well-functioning urban environment" under the NPS-UD (para.5.3.13, 5.3.14 & para.6.3.18).*
				Water quality and wastewater capacity	**Reject** *The evidence establishes that the site can be serviced with potable water and reticulated wastewater connections (para.5.6.12).*
				Stormwater management	**Accept** *PPC23 as notified does not establish how stormwater can be effectively managed or that any related adverse effects can be effectively mitigated (para.5.8.18 & para. 5.8.19).*
				Adverse effects on natural values	**Reject** *The evidence establishes that the ODP provides opportunities to enhance habitats within the site to support ecology, natural values and birdlife that would contribute to the natural values of the wider area (para.5.10.7).*
				Flood risk	**Accept** *PPC23 as notified does not address the concerns raised in the evidence that the natural hazard risks have been identified and can be effectively mitigated (para.5.8.19).*
				Natural hazard risk – Tsunami evacuation	**Accept in part** *There is sufficient network capacity to ensure traffic heading inland will be able to make a timely evacuation and ODP requirement for road designs to support safe egress during hazard events (para.5.7.10 and Appendix 3).*
				Adverse transport effects	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
				Compromised social wellbeing	**Reject** *The effects cannot be quantified and would be managed outside of the RMA (para.5.11.8).*
				Human health risks – Radio transmission emissions	**Reject** *The risks to human health are being effectively managed through the consents and national standards that in place to manage the operation of the Ōuruhia transmission site (para.5.8.8).*
				Human health risks – Contaminated land	**Reject** *The risks to human health can be effectively managed by the NESCS consenting regime (para.5.8.7).*
				Lack of reserves and community facilities	**Reject** *The additional population base will support the school (para.5.6.38), local amenities (para.5.6.39) and reserves (para.5.10.7).*
				Adverse reverse sensitivity effects	**Reject** *Any reverse sensitivity effects on rural activities would be avoided by the site context and ODP requirements (para.5.9.7 to 5.9.9) and on the Ōuruhia transmission site by the conditions granted to the network utility provider (para.5.9.10).*
				Economic sufficiency and feasibility	**Reject in part** *The additional housing capacity will be provided to support supply and choice, but additional assessments are required to substantiate the economic costs and benefits (para.5.4.19 & para.5.4.20).*
				Property impacts – Equity	**Reject** *There is no RMA scope to consider the impacts of the rezoning on property values, insurance premiums, maintenance costs or LGA rates increases (para.5.11.4 to 5.11.7).*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
				Insufficient consultation	**Reject** *There is no duty for the Proponent to consult with landowners or mana whenua (para.5.2.4).*
				Insufficient technical assessment	**Accept** *The additional technical assessments listed in paragraph 1.1.8 are required to substantiate the effects of the rezoning and establish appropriate mitigation where necessary (para.5.2.5).*
Kerry and Leith Wells	**S33**	**S33.1**	Neither support nor oppose	Accept the plan change subject to other submission points to protect rural character and amenity	**Accept in part** *The evidence establishes that PPC23 as notified may compromise the existing character and amenity of the area and give rise to adverse visual effects (para.5.5.19).*
		S33.2	Neither support nor oppose	Add a road access to Lower Styx Road to mitigate adverse transport effects	**Accept in part** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20). A road connection to Lower Styx Road is listed as an item in paragraph 1.1.8 for the Proponent to investigate.*
		S33.3	Neither support nor oppose	Potable water to be via Council's reticulated network to protect existing supplies	**Reject** *The evidence establishes that the site can be serviced with potable water and reticulated wastewater connections (para.5.6.12).*
		S33.4	Neither support nor oppose	Housing designs need to be stipulated to protect open space	**Accept in part** *The evidence establishes that PPC23 as notified may compromise the existing character and amenity of the area and give rise to adverse visual effects (para.5.5.19).*
Debbie Ling	**S34**	**S34.1**	Oppose	Adverse effects on natural values	**Reject** *The evidence establishes that the ODP provides opportunities to enhance habitats within the site to support ecology, natural values and birdlife that would contribute to the natural values of the wider area (para.5.10.7).*

Submitter	Submission No.	Decision No.	Request	Decision Sought		Recommendation and Reasons
				Adverse nuisance effects – Light and noise		**Reject** *The CDP includes appropriate provisions to manage nuisance effects, including light spill and noise, at the time of subdivision (para.5.6.33).*
				Stormwater management		**Accept** *PPC23 as notified does not establish how stormwater can be effectively managed or that any related adverse effects can be effectively mitigated (para.5.8.18 & para. 5.8.19).*
				Adverse transport effects		**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
				Natural hazard risk – Tsunami evacuation		**Accept in part** *There is sufficient network capacity to ensure traffic heading inland will be able to make a timely evacuation and ODP requirement for road designs to support safe egress during hazard events (para.5.7.10 and Appendix 3).*
				Economic sufficiency and feasibility		**Reject in part** *Additional housing capacity will be provided to support supply and choice, but additional assessments are required to substantiate the economic costs and benefits (para.5.4.19 & para.5.4.20).*
				Property impacts – Boundary tree maintenance		**Reject** *There is no RMA scope to consider the impacts of the rezoning on property values, insurance premiums, maintenance costs or LGA rates increases (para.5.11.4 to 5.11.7).*
			Further submission No.	**Further Submitter**	**Support / Oppose**	
			FS01	T Wells	*Support*	**Accept, accept in part, reject in part and reject** *Reasons as above*.

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
Reuben Ennor	**S35**	**S35.1**	**Oppose**	Adverse transport effects	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
				Flood and geotechnical risk	**Accept** *PPC23 as notified does not address the concerns raised in the evidence that the natural hazard risks have been identified and can be effectively mitigated (para.5.8.14 & 5.8.19).*
				Inconsistency with existing zoning patterns	**Accept** *The evidence establishes that PPC23 as notified does not represent a "well-functioning urban environment" under the NPS-UD (para.5.3.13, 5.3.14 & para.6.3.18).*
				Stormwater management	**Accept** *PPC23 as notified does not establish how stormwater can be effectively managed or that any related adverse effects can be effectively mitigated (para.5.8.18 & para. 5.8.19).*
				Adverse character and amenity effects	**Accept** *The evidence establishes that PPC23 as notified may compromise the existing character and amenity of the area and give rise to adverse visual effects (para.5.5.19).*
				Adverse effects on natural values and the river	**Reject** *The evidence establishes that the ODP provides opportunities to enhance habitats within the site to support ecology, natural values and birdlife that would contribute to the natural values of the wider area (para.5.10.7).*
				Property impacts - Rates	**Reject** *There is no RMA scope to consider the impacts of the rezoning on property values, insurance premiums, maintenance costs or LGA rates increases (para.5.11.4 to 5.11.7).*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
Heidi King	**S36**	**S36.1**	**Oppose**	Adverse character and amenity effects	**Accept** *The evidence establishes that PPC23 as notified may compromise the existing character and amenity of the area and give rise to adverse visual effects (para.5.5.19).*
				Adverse nuisance effects – Noise	**Reject** *The CDP includes appropriate provisions to manage nuisance effects, including noise, at the time of subdivision (para.5.6.33).*
				Adverse effects on natural values and the river	**Reject** *The evidence establishes that the ODP provides opportunities to enhance habitats within the site to support ecology, natural values and birdlife that would contribute to the natural values of the wider area (para.5.10.7).*
				Adverse transport effects	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
				Compromised community wellbeing	**Accept in part** *Indeterminable effects that would be managed by outside of the RMA (para.5.11.8).*
Maccullin Skelly	**S37**	**S37.1**	**Oppose**	Water and wastewater capacity	**Reject** *The evidence establishes that the site can be serviced with potable water and reticulated wastewater connections (para.5.6.12).*
				Adverse transport effects	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
				Adverse effects on the river and habitats	**Reject** *The evidence establishes that the ODP provides opportunities to enhance habitats within the site to support ecology, natural values and birdlife that would contribute to the natural values of the wider area (para.5.10.7).*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
Nicole Duxbury	**S38**	**S38.1**	**Oppose**	Property impacts - Rates	**Reject** *There is no RMA scope to consider the impacts of the rezoning on property values, insurance premiums, maintenance costs or LGA rates increases (para.5.11.4 to 5.11.7).*
				Adverse character and amenity effects	**Accept** *The evidence establishes that PPC23 as notified may compromise the existing character and amenity of the area and give rise to adverse visual effects (para.5.5.19).*
				Compromised community wellbeing	**Accept in part** *Indeterminable effects that would be managed by outside of the RMA (para.5.11.8).*
				Geotechnical and flood risk	**Accept** *PPC23 as notified does not address the concerns raised in the evidence that the natural hazard risks have been identified and can be effectively mitigated (para.5.8.14 & 5.8.19).*
Andrea Te Ohaere-Fox	**S39**	**S39.1**	**Oppose**	Adverse character and amenity effects	**Accept** *The evidence establishes that PPC23 as notified may compromise the existing character and amenity of the area and give rise to adverse visual effects (para.5.5.19).*
				Adverse transport effects	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
Alexander Neate	**S40**	**S40.1**	**Support**	Positive character and amenity effects	**Reject** *The evidence establishes that PPC23 as notified may compromise the existing character and amenity of the area and give rise to adverse visual effects (para.5.5.19).*
				Support urban sprawl	**Reject** *The evidence establishes that PPC23 as notified does not represent a "well-functioning urban environment" under the NPS-UD (para.5.3.13, 5.3.14 & para.6.3.18).*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
				Assist to protect natural values and the river	**Accept** *The evidence establishes that the ODP provides opportunities to enhance habitats within the site to support ecology, natural values and birdlife that would contribute to the natural values of the wider area (para.5.10.7).*
Mel Gilmore	**S41**	**S41.1**	**Oppose**	Adverse character and amenity effects	**Accept** *The evidence establishes that PPC23 as notified may compromise the existing character and amenity of the area and give rise to adverse visual effects (para.5.5.19).*
				Adverse effects on natural values and the river	**Reject** *The evidence establishes that the ODP provides opportunities to enhance habitats within the site to support ecology, natural values and birdlife that would contribute to the natural values of the wider area (para.5.10.7).*
				Stormwater management	**Accept** *PPC23 as notified does not establish how stormwater can be effectively managed or that any related adverse effects can be effectively mitigated (para.5.8.18 & para. 5.8.19).*
				Water and wastewater capacity	**Reject** *The evidence establishes that the site can be serviced with potable water and reticulated wastewater connections (para.5.6.12).*
				Utility capacity	**Reject** *The standard subdivision process requires that power and telecommunication services are installed prior to records of title being issued (para.5.6.24).*
				Flood risk	**Accept** *PPC23 as notified does not address the concerns raised in the evidence that the natural hazard risks have been identified and can be effectively mitigated (para.5.8.19).*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
				Adverse transport effects	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
Jenny Knight	**S42**	**S42.1**	**Oppose**	Flood and tsunami risk	**Accept** *PPC23 as notified does not address the concerns raised in the evidence that the natural hazard risks have been identified and can be effectively mitigated (para.5.8.19).*
				Natural hazard risk – Tsunami evacuation	**Accept in part** *There is sufficient network capacity to ensure traffic heading inland will be able to make a timely evacuation and ODP requirement for road designs to support safe egress during hazard events (para.5.7.10 and Appendix 3).*
				Adverse transport effects	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
				Property impacts – Rates	**Reject** *There is no RMA scope to consider the impacts of the rezoning on property values, insurance premiums, maintenance costs or LGA rates increases (para.5.11.4 to 5.11.7).*
				Adverse cultural values effects	**Reject** *No sites of interest have been identified, it is a highly modified site, and standard discovery protocols can manage the discovery of sites or values of interest (para.5.10.5).*
				Adverse character and amenity effects	**Accept** *The evidence establishes that PPC23 as notified may compromise the existing character and amenity of the area and give rise to adverse visual effects (para.5.5.19).*
				Adverse effects on natural values and the river	**Reject** *The evidence establishes that the ODP provides opportunities to enhance habitats within the site to support*

Submitter	Submission No.	Decision No.	Request	Decision Sought		Recommendation and Reasons
						ecology, natural values and birdlife that would contribute to the natural values of the wider area (para.5.10.7).
				Adverse precedent effects		**Reject** *Precedent effects don't apply to rezonings and the SPRZ is sufficient unique to ensure that the approval of PPC23 would compromise the integrity of the CDP (para.5.3.15).*
			Further submission No.	**Further Submitter**	**Support / Oppose**	
			FS01	T Wells	*Support*	**Accept, Accept in part and Reject** *Reasons as above*.
Kimberley Bowden	**S43**	**S43.1**	**Oppose**	Adverse character and amenity effects		**Accept** *The evidence establishes that PPC23 as notified may compromise the existing character and amenity of the area and give rise to adverse visual effects (para.5.5.19).*
				Water and wastewater capacity		**Reject** *The evidence establishes that the site can be serviced with potable water and reticulated wastewater connections (para.5.6.12).*
				Stormwater management (capacity)		**Accept** *PPC23 as notified does not establish how stormwater can be effectively managed or that any related adverse effects can be effectively mitigated (para.5.8.18 & para. 5.8.19).*
Victoria Knowles	**S44**	**S44.1**	**Oppose**	Adverse character and amenity effects		**Accept** *The evidence establishes that PPC23 as notified may compromise the existing character and amenity of the area and give rise to adverse visual effects (para.5.5.19).*
				Adverse transport effects		**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
				Property impacts - Value	**Reject** *There is no RMA scope to consider the impacts of the rezoning on property values, insurance premiums, maintenance costs or LGA rates increases (para.5.11.4 to 5.11.7).*
				Natural hazard risk – Tsunami evacuation	**Accept in part** *There is sufficient network capacity to ensure traffic heading inland will be able to make a timely evacuation and ODP requirement for road designs to support safe egress during hazard events (para.5.7.10 and Appendix 3).*
Daniel John Knight	**S45**	**S45.1**	**Oppose**	Adverse transport effects	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
				Stormwater management	**Accept** *PPC23 as notified does not establish how stormwater can be effectively managed or that any related adverse effects can be effectively mitigated (para.5.8.18 & para. 5.8.19).*
				Reverse sensitivity – Rural activities	**Reject** *Any reverse sensitivity effects on rural activities would be avoided by the site context and ODP requirements (para.5.9.7 to 5.9.9) and on the Ōuruhia transmission site by the conditions granted to the network utility provider (para.5.9.10).*
				Flood risk	**Accept** *PPC23 as notified does not address the concerns raised in the evidence that the natural hazard risks have been identified and can be effectively mitigated (para.5.8.19).*
				Adverse character and amenity effects	**Accept** *The evidence establishes that PPC23 as notified may compromise the existing character and amenity of the area and give rise to adverse visual effects (para.5.5.19).*

Submitter	Submission No.	Decision No.	Request	Decision Sought		Recommendation and Reasons
				Adverse nuisance effects - Noise		**Reject** *The CDP includes appropriate provisions to manage nuisance effects, including noise, at the time of subdivision (para.5.6.33).*
				Insufficient due process - Consultation		**Reject** *There is no duty for the Proponent to consult with landowners or mana whenua (para.5.2.4).*
			Further submission No.	**Further Submitter**	**Support / Oppose**	
			FS01	T Wells	*Support*	**Accept and reject** *Reasons as above*.
Andrew Hicks	**S46**	**S46.1**	**Neither support nor oppose**	Requirements need to preserve natural values		**Reject** *The evidence does not establish the need for additional development controls to protect natural values (para.5.10.7).*
				Requirement to manage cycle safety and connectivity		**Accept** *PPC23 as notified does not support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
		46.2	**Neither support nor oppose**	Requirement to establish a greenbelt between the site and Spencerville		**Reject** *The evidence doesn't support a greenbelt (para.5.5.19).*
				Landscape interface buffer strip to be increased		**Accept in part** *The evidence establishes that the ODP makes sufficient provision for reserves (para.5.6.27). The expert evidence establishes that PPC23 as notified may compromise the existing character and amenity of the area and give rise to adverse visual effects (para.5.5.19).*
		46.3	**Neither support nor oppose**	Requirement for transport safety upgrades to Spencerville Road and Lower Styx Road		**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8).*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
		46.3	**Neither support nor oppose**	Requirement to extend the cycle and pedestrian network	**Accept** *PPC23 as notified does not support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
Jan Burney	**S47**	**S47.1**	**Oppose**	Stormwater management	**Accept** *PPC23 as notified does not establish how stormwater can be effectively managed or that any related adverse effects can be effectively mitigated (para.5.8.18 & para. 5.8.19).*
				Adverse transport effects	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
Brad Uren	**S48**	**S48.1**	**Oppose**	Adverse transport effects	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
Natasha Hough	**S49**	**S49.1**	**Oppose**	Water and wastewater capacity	**Reject** *The evidence establishes that the site can be serviced with potable water and reticulated wastewater connections (para.5.6.12).*
				Adverse transport effects	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
				Stormwater management (capacity)	**Accept** *PPC23 as notified does not establish how stormwater can be effectively managed or that any related adverse effects can be effectively mitigated (para.5.8.18 & para. 5.8.19).*
				Adverse effects on the river and habitats	**Reject** *The evidence establishes that the ODP provides opportunities to enhance habitats within the site to support ecology, natural values and birdlife that would contribute to the natural values of the wider area (para.5.10.7).*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
Dan McGarvey	**S50**	**S50.1**	**Oppose**	Flood risk	**Accept** *PPC23 as notified does not address the concerns raised in the evidence that the natural hazard risks have been identified and can be effectively mitigated (para.5.8.19).*
Gail Lowe	**S51**	**S51.1**	**Oppose**	Adverse character and amenity effects	**Accept** *The evidence establishes that PPC23 as notified may compromise the existing character and amenity of the area and give rise to adverse visual effects (para.5.5.19).*
				Adverse transport effects	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
				Flood and tsunami risk	**Accept** *PPC23 as notified does not address the concerns raised in the evidence that the natural hazard risks have been identified and can be effectively mitigated (para.5.8.19).*
				Adverse effects on the river and habitats	**Reject** *The evidence establishes that the ODP provides opportunities to enhance habitats within the site to support ecology, natural values and birdlife that would contribute to the natural values of the wider area (para.5.10.7).*
				Water and wastewater capacity	**Reject** *The evidence establishes that the site can be serviced with potable water and reticulated wastewater connections (para.5.6.12).*
				Stormwater management (capacity)	**Accept** *PPC23 as notified does not establish how stormwater can be effectively managed or that any related adverse effects can be effectively mitigated (para.5.8.18 & para. 5.8.19).*
				Lack of reserves and community facilities	**Reject** *The additional population base will support the school (para.5.6.38), local amenities (para.5.6.39) and reserves (para.5.10.7).*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
Gary Altenburg – Gramco Limited	**S52**	**S52.1**	**Support**	Subject to 75% of 176 Turners Road to be residential and 25% for stormwater management	**Reject** *PPC23 as notified does not establish how stormwater can be effectively managed or that any related adverse effects can be effectively mitigated (para.5.8.18 & para. 5.8.19).*
				Subject to the stormwater management area at 175 Turners Road being sized correctly	**Reject** *PPC23 as notified does not establish how stormwater can be effectively managed or that any related adverse effects can be effectively mitigated (para.5.8.18 & para. 5.8.19).*
				Aligns with strategic planning	**Reject** *The evidence establishes that PPC23 as notified does not represent a "well-functioning urban environment" under the NPS-UD (para.5.3.13, 5.3.14 & para.6.3.18).*
				Consistent with RMA purpose	**Reject** *PPC23 as notified is not consistent with the RMA Purpose (para.6.1.6).*
				Positive environment effects	**Reject** *PPC23 as notified is not consistent with the RMA Purpose (para.6.1.6).*
				Positive character and amenity effects	**Reject** *The evidence establishes that PPC23 as notified may compromise the existing character and amenity of the area and give rise to adverse visual effects (para.5.5.19).*
				Positive social wellbeing	**Accept in part** *The effects cannot be quantified and would be managed outside of the RMA (para.5.11.8).*
Ross and Karen Winter	**S53**	**S53.1**	**Oppose**	Adverse character and amenity effects	**Accept** *The evidence establishes that PPC23 as notified may compromise the existing character and amenity of the area and give rise to adverse visual effects (para.5.5.19).*
Jesse Lowe	**S54**	**S54.1**	**Oppose**	Economic sufficiency and feasibility	**Reject in part** *Additional housing capacity will be provided to support supply and choice, but additional assessments are required*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
					to substantiate the economic costs and benefits (para.5.4.19 & para.5.4.20).
				Adverse transport effects	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
				Adverse character and amenity effects	**Accept** *The evidence establishes that PPC23 as notified may compromise the existing character and amenity of the area and give rise to adverse visual effects (para.5.5.19).*
				Insufficient consultation	**Reject** *There is no duty for the Proponent to consult with landowners or mana whenua (para.5.2.4).*
				Insufficient technical assessment	**Accept** *The additional technical assessments listed in paragraph 1.1.8 are required to substantiate the effects of the rezoning and establish appropriate mitigation where necessary (para.5.2.5).*
				Adverse natural values effects	**Reject** *The evidence establishes that the ODP provides opportunities to enhance habitats within the site to support ecology, natural values and birdlife that would contribute to the natural values of the wider area (para.5.10.7).*
				Natural hazard risk – Tsunami evacuation	**Accept in part** *There is sufficient network capacity to ensure traffic heading inland will be able to make a timely evacuation and ODP requirement for road designs to support safe egress during hazard events (para.5.7.10 and Appendix 3).*
				Flood risk	**Accept** *PPC23 as notified does not address the concerns raised in the evidence that the natural hazard risks have been identified and can be effectively mitigated (para.5.8.19).*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
				Water and wastewater capacity	**Reject** *The evidence establishes that the site can be serviced with potable water and reticulated wastewater connections (para.5.6.12).*
				Stormwater management (capacity)	**Accept** *PPC23 as notified does not establish how stormwater can be effectively managed or that any related adverse effects can be effectively mitigated (para.5.8.18 & para. 5.8.19).*
				Property impacts - Rates	**Reject** *There is no RMA scope to consider the impacts of the rezoning on property values, insurance premiums, maintenance costs or LGA rates increases (para.5.11.4 to 5.11.7).*
Murray Wakelin Family Trust (MWFT)	**S55**	**S55.1**	**Oppose**	Flood and tsunami risk	**Accept** *PPC23 as notified does not address the concerns raised in the evidence that the natural hazard risks have been identified and can be effectively mitigated (para.5.8.19).*
				Natural hazard risk – Tsunami evacuation	**Accept in part** *There is sufficient network capacity to ensure traffic heading inland will be able to make a timely evacuation and ODP requirement for road designs to support safe egress during hazard events (para.5.7.10 and Appendix 3).*
				Adverse effects on the river and habitats	**Reject** *The evidence establishes that the ODP provides opportunities to enhance habitats within the site to support ecology, natural values and birdlife that would contribute to the natural values of the wider area (para.5.10.7).*
				Adverse character and amenity effects	**Accept** *The evidence establishes that PPC23 as notified may compromise the existing character and amenity of the area and give rise to adverse visual effects (para.5.5.19).*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
Anne Scott	**S56**	**S56.1**	**Oppose**	Flood risk	**Accept** *PPC23 as notified does not address the concerns raised in the evidence that the natural hazard risks have been identified and can be effectively mitigated (para.5.8.19).*
John Hawkins	**S57**	**S57.1**	**Oppose**	Adverse effects on natural values	**Reject** *The evidence establishes that the ODP provides opportunities to enhance habitats within the site to support ecology, natural values and birdlife that would contribute to the natural values of the wider area (para.5.10.7).*
				Adverse effects on cultural values	**Reject** *There are no sites of interest have been identified, it is a highly modified site, and standard discovery protocols can manage the discovery of sites or values of interest (para.5.10.5).*
				Stormwater management	**Accept** *PPC23 as notified does not establish how stormwater can be effectively managed or that any related adverse effects can be effectively mitigated (para.5.8.18 & para. 5.8.19).*
				Adverse transport	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
David Tipple	**S58**	**S58.1**	**Support**	Support housing supply and choice	**Accept in part** *Additional housing capacity will be provided to support supply and choice, but additional assessments are required to substantiate the economic costs and benefits (para.5.4.19 & para.5.4.20).*
				Supports improved accessibility	**Reject** *PPC23 as notified does not support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*

Submitter	Submission No.	Decision No.	Request	Decision Sought		Recommendation and Reasons
				Support natural values protection and access		**Accept** *Facilitates access to the Pūharakekenui-Styx River corridor and requires ecological restoration to occur (para.5.10.6).*
				Appropriate requirements in the ODP to achieve positive outcomes		**Reject** *The evidence establishes that PPC23 as notified does not represent a "well-functioning urban environment" under the NPS-UD (para.5.3.13, 5.3.14 & para.6.3.18).*
			Further submission No.	**Further Submitter**	**Support / Oppose**	
			FS02	H & G Nimmo	*Oppose*	**Accept, accept in part and reject** *Reasons as above*.
Ōuruhia Model School (ŌRS)	**S59**	**S59.1**	**Support**	Supports the viability of the local school		**Accept** *The additional population base will support the school (para.5.6.38).*
		S59.2	**Support**	Requests the ODP facilitates safe school access		**Accept in part** *PPC23 would increase the levels of accessibility to Ōuruhia Model School, but additional assessments and ODP amendments are required (para.5.7.19 & 5.7.20).*
		S59.3	**Support**	Request the ODP supports placed based learning, including access to reserves and the river		**Accept** *Facilitates access to the Pūharakekenui-Styx River corridor and requires ecological restoration to occur (para.5.10.6).*
		S59.4	**Support**	Request infrastructure staging to align with the management of the school roll increases		**Reject** *The CDP includes appropriate provisions to manage nuisance effects, including the staging of development, at the time of subdivision (para.5.6.33).*
Rolling Meadows	**S60**	**S60.1**	**Oppose**	Adverse reverse sensitivity effects		**Reject** *Any reverse sensitivity effects would be avoided through the existing conditions of consent granted to the festival organiser (para.5.9.11).*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
Pauline McGuigan	**S61**	**S61.1**	**Oppose**	Stormwater management	**Accept** *PPC23 as notified does not establish how stormwater can be effectively managed or that any related adverse effects can be effectively mitigated (para.5.8.18 & para. 5.8.19).*
Aleesa McKenzie	**S62**	**S62.1**	**Oppose**	Flood and tsunami risk	**Accept** *PPC23 as notified does not address the concerns raised in the evidence that the natural hazard risks have been identified and can be effectively mitigated (para.5.8.19).*
				Natural hazard risk – Tsunami evacuation	**Accept in part** *There is sufficient network capacity to ensure traffic heading inland will be able to make a timely evacuation and ODP requirement for road designs to support safe egress during hazard events (para.5.7.10 and Appendix 3).*
				Adverse transport effects	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
				Water capacity and quality	**Reject** *The evidence establishes that the site can be serviced with potable water and reticulated wastewater connections (para.5.6.12).*
				Compromised social wellbeing	**Reject** *The effects cannot be quantified and would be managed outside of the RMA (para.5.11.8).*
Janine Burns	**S63**	**S63.1**	**Oppose**	Adverse traffic effects	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
				Tsunami and flood risk	**Accept** *PPC23 as notified does not address the concerns raised in the evidence that the natural hazard risks have been identified and can be effectively mitigated (para.5.8.19).*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
				Water and wastewater capacity	**Reject** *The evidence establishes that the site can be serviced with potable water and reticulated wastewater connections (para.5.6.12).*
				Stormwater management	**Accept** *PPC23 as notified does not establish how stormwater can be effectively managed or that any related adverse effects can be effectively mitigated (para.5.8.18 & para. 5.8.19).*
				Adverse effects on the river and habitats	**Reject** *The evidence establishes that the ODP provides opportunities to enhance habitats within the site to support ecology, natural values and birdlife that would contribute to the natural values of the wider area (para.5.10.7).*
				Character and amenity effects	**Accept** *The evidence establishes that PPC23 as notified may compromise the existing character and amenity of the area and give rise to adverse visual effects (para.5.5.19).*
				Economic sufficiency and feasibility	**Reject in part** *Additional housing capacity will be provided to support supply and choice, but additional assessments are required to substantiate the economic costs and benefits (para.5.4.19 & para.5.4.20).*
				Human health risks – Radio transmission emissions	**Reject** *Any risks to human health are being effectively managed through the consents and national standards that in place to manage the operation of the Ōuruhia transmission site (para.5.8.8).*
				Human health risks – Contaminated land	**Reject** *Any risks to human health can be effectively managed by the NESCS consenting regime (para.5.8.7).*
				Adverse nuisance effects	**Reject** *The CDP includes appropriate provisions to manage nuisance effects, including those relating to construction*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
					phase development works, at the time of subdivision (para.5.6.33).
				Adverse effects on cultural values	**Reject** *No sites of interest have been identified, it is a highly modified site, and standard discovery protocols can manage the discovery of sites or values of interest (para.5.10.5).*
				Adverse reverse sensitivity effects	**Reject** *Any reverse sensitivity effects on rural activities would be avoided by the site context and ODP requirements (para.5.9.7 to 5.9.9) and on the Ōuruhia transmission site by the conditions granted to the network utility provider (para.5.9.10).*
				Compromised social wellbeing	**Reject** *The effects cannot be quantified and would be managed outside of the RMA (para.5.11.8).*
				Insufficient consultation	**Reject** *There is no duty for the Proponent to consult with landowners or mana whenua (para.5.2.4).*
		S63.2	Oppose	Alternate relief – Archaeological study required	**Reject** *No sites of interest have been identified, it is a highly modified site, and standard discovery protocols can manage the discovery of sites or values of interest (para.5.10.5).*
		S63.3	Oppose	Alternate relief – Contaminated land assessment required	**Reject** *Any risks to human health from contaminated soils can be effectively managed by the NESCS consenting regime (para.5.8.7).*
		S63.3	Oppose	Alternate relief – Land development management	**Reject** *The CDP includes appropriate provisions to manage nuisance effects, including those relating to construction phase development works, at the time of subdivision (para.5.6.33).*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
Gordon Cockerill	***S64***	***S64.1***	*Submission withdrawn*	*Submission withdrawn*	***Submissions withdrawn***
Celeste Faithfull	**S65**	**S65.1**	Oppose	Adverse transport effects	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
				Natural hazard risk – Tsunami evacuation	**Accept in part** *There is sufficient network capacity to ensure traffic heading inland will be able to make a timely evacuation and ODP requirement for road designs to support safe egress during hazard events (para.5.7.10 and Appendix 3).*
				Flood, geotechnical and tsunami risk	**Accept** *PPC23 as notified does not address the concerns raised in the evidence that the natural hazard risks have been identified and can be effectively mitigated (para.5.8.14 & 5.8.19).*
				Water and wastewater capacity	**Reject** *The evidence establishes that the site can be serviced with potable water and reticulated wastewater connections (para.5.6.12).*
				Adverse effects on natural values	**Reject** *The evidence establishes that the ODP provides opportunities to enhance habitats within the site to support ecology, natural values and birdlife that would contribute to the natural values of the wider area (para.5.10.7).*
				Inconsistent with planning instruments, including the CDP and CRPS	**Accept** *PPC23 as notified is unable to demonstrate the rezoning is consistent with the NPS-UD (para.6.3.18), NPS-NH (para.6.3.22), NPS-I (para.6.3.27), NPS-FWM (para.6.3.38), the CRPS (para.6.3.47) and the CDP (para.7.1.2).*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
Debbie English	**S66**	**S66.1**	Oppose	Wastewater capacity, including odour	**Reject** *The evidence establishes that the site can be serviced with potable water and reticulated wastewater connections (para.5.6.12).*
				Flood risk	**Accept** *PPC23 as notified does not address the concerns raised in the evidence that the natural hazard risks have been identified and can be effectively mitigated (para.5.8.19).*
				Natural hazard risk – Tsunami evacuation	**Accept in part** *There is sufficient network capacity to ensure traffic heading inland will be able to make a timely evacuation and ODP requirement for road designs to support safe egress during hazard events (para.5.7.10 and Appendix 3).*
				Adverse transport effects	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
				Property impacts- Rates	**Reject** *There is no RMA scope to consider the impacts of the rezoning on property values, insurance premiums, maintenance costs or LGA rates increases (para.5.11.4 to 5.11.7).*
Denis Gilmore	**S67**	**S67.1**	Oppose	Floor risk	**Accept** *PPC23 as notified does not address the concerns raised in the evidence that the natural hazard risks have been identified and can be effectively mitigated (para.5.8.19).*
				Adverse reverse sensitivity effects	**Reject** *Any reverse sensitivity effects on rural activities would be avoided by the site context and ODP requirements (para.5.9.7 to 5.9.9) and on the Ōuruhia transmission site by the conditions granted to the network utility provider (para.5.9.10).*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
				Stormater management	**Accept** *PPC23 as notified does not establish how stormwater can be effectively managed or that any related adverse effects can be effectively mitigated (para.5.8.18 & para. 5.8.19).*
				Natural hazard risk – Tsunami evacuation	**Accept in part** *There is sufficient network capacity to ensure traffic heading inland will be able to make a timely evacuation and ODP requirement for road designs to support safe egress during hazard events (para.5.7.10 and Appendix 3).*
				Adverse transport effects	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
Lyndia Maurice	**S68**	**S68.1**	Oppose	Adverse reverse sensitivity effects	**Reject** *Any reverse sensitivity effects on rural activities would be avoided by the site context and ODP requirements (para.5.9.7 to 5.9.9) and on the Ōuruhia transmission site by the conditions granted to the network utility provider (para.5.9.10).*
				Adverse transport effects	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
				Adverse effects on natural values	**Reject** *The evidence establishes that the ODP provides opportunities to enhance habitats within the site to support ecology, natural values and birdlife that would contribute to the natural values of the wider area (para.5.10.7).*
				Wastewater capacity	**Reject** *The evidence establishes that the site can be serviced with reticulated wastewater connections (para.5.6.12).*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
				Adverse nuisance effects	**Reject** *The CDP includes appropriate provisions to manage nuisance effects, including those relating to construction phase development works, at the time of subdivision (para.5.6.33).*
				Stormwater management	**Accept** *PPC23 as notified does not establish how stormwater can be effectively managed or that any related adverse effects can be effectively mitigated (para.5.8.18 & para. 5.8.19).*
Canterbury Regional Council (ECan)	**S69**	**S69.1**	Neither support nor oppose	Assessment of CRPS Policy 9.3.1 is required	**Reject** *There is no scope to apply the criteria or evidence to substantiate that it is necessary (para.5.10.8).*
				Additional stormwater management and groundwater assessments are required	**Accept** *PPC23 as notified does not establish how stormwater can be effectively managed or that any related adverse effects can be effectively mitigated (para.5.8.18 & para. 5.8.19). The Proponent has been requested to provide the additional assessments listed in paragraph 1.1.8.*
				Development feasibility needs to be established	**Accept** *Additional housing capacity will be provided to support supply and choice, but additional assessments are required to substantiate the economic costs and benefits (para.5.4.19 & para.5.4.20).*
				The Preliminary Site Investigation doesn't cover 165 Turners Road that is a HAIL site	**Reject** *Any risks to human health can be effectively managed by the NESCS consenting regime (para.5.8.7).*
		S69.2	Neither support nor oppose	Additional stormwater management and groundwater assessments are required, including to establish the suitability of the basin locations	**Accept** *PPC23 as notified does not establish how stormwater can be effectively managed or that any related adverse effects can be effectively mitigated (para.5.8.18 & para. 5.8.19).*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
		S69.3	Neither support nor oppose	Consistency of the proposal with NPS-UD Policy 8 need to be established and the associated risks and issues with out of sequence development addressed	**Accept** *PPC23 as notified does not support the necessary levels of accessibility (para.5.7.19 & 5.7.20) to the extent necessary for a "well-functioning urban environment" or to establish consistency with the NPSUD (para.6.3.18).*
Ōuruhia Residents Group (ŌRS)	**S70**	**S70.1**	Oppose	Adverse transport effects	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
				Flood and tsunami risk	**Accept** *PPC23 as notified does not address the concerns raised in the evidence that the natural hazard risks have been identified and can be effectively mitigated (para.5.8.19).*
				Stormwater management	**Accept** *PPC23 as notified does not establish how stormwater can be effectively managed or that any related adverse effects can be effectively mitigated (para.5.8.18 & para. 5.8.19).*
				Water and wastewater capacity	**Reject** *The evidence establishes that the site can be serviced with potable water and reticulated wastewater connections (para.5.6.12).*
				Adverse effects on the river and habitats	**Reject** *The evidence establishes that the ODP provides opportunities to enhance habitats within the site to support ecology, natural values and birdlife that would contribute to the natural values of the wider area (para.5.10.7).*
				Adverse character and amenity effects	**Accept** *The evidence establishes that PPC23 as notified may compromise the existing character and amenity of the area and give rise to adverse visual effects (para.5.5.19).*
				Adverse reverse sensitivity effects	**Reject** *Any reverse sensitivity effects on rural activities would be avoided by the site context and ODP requirements*

Submitter	Submission No.	Decision No.	Request	Decision Sought		Recommendation and Reasons
						(para.5.9.7 to 5.9.9) and on the Ōuruhia transmission site by the conditions granted to the network utility provider (para.5.9.10).
				Compromised social wellbeing		**Reject** *The effects cannot be quantified and would be managed outside of the RMA (para.5.11.8).*
				Economic sufficiency and feasibility, including exaggerate economic effects		**Accept in part** *Additional housing capacity will be provided to support supply and choice, but additional assessments are required to substantiate the economic costs and benefits (para.5.4.19 & para.5.4.20).*
				Adverse nuisance effects, including noise and dust		**Reject** *The CDP includes appropriate provisions to manage nuisance effects, including noise and dust, at the time of subdivision (para.5.6.33).*
				Insufficient consultation		**Reject** *There is no duty for the Proponent to consult with landowners or mana whenua (para.5.2.4).*
				Adverse effects on cultural effects		**Reject** *No sites of interest have been identified, it is a highly modified site, and standard discovery protocols can manage the discovery of sites or values of interest (para.5.10.5).*
				Human health - Contaminated land		**Reject** *Any risks to human health can be effectively managed by the NESCS consenting regime (para.5.8.7).*
			Further submission No.	**Further Submitter**	**Support / Oppose**	
			FS01	T Wells	*Support*	**Accept, Accept in part and Reject** *Reasons as above*.
			FS03	R Muschamp	*Support*	**Accept, Accept in part and Reject** *Reasons as above*.

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
		S70.2	Oppose	Alternate relief – Archaeological study required	**Reject** *No sites of interest have been identified, it is a highly modified site, and standard discovery protocols can manage the discovery of sites or values of interest (para.5.10.5).*
		S70.3	Oppose	Alternate relief – Contaminated land assessment required	**Reject** *Any risks to human health from contaminated soils can be effectively managed by the NESCS consenting regime (para.5.8.7).*
		S70.4	Oppose	Alternate relief – Construction management	**Reject** *The CDP includes appropriate provisions to manage nuisance effects, including those relating to construction phase development works, at the time of subdivision (para.5.6.33).*
Kristin and Andrew Buxton	**S71**	**S71.1**	Oppose	Does not constitute a *"well-functioning urban environment"*	**Accept** *The evidence establishes that PPC23 as notified does not represent a "well-functioning urban environment" under the NPS-UD (para.5.3.13, 5.3.14 & para.6.3.18).*
				Economic sufficiency and feasibility,	**Reject in part** *Additional housing capacity will be provided to support supply and choice, but additional assessments are required to substantiate the economic costs and benefits (para.5.4.19 & para.5.4.20).*
				Water and wastewater capacity	**Reject** *The evidence establishes that the site can be serviced with potable water and reticulated wastewater connections (para.5.6.12).*
				Adverse transport effects	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
				Loss of highly productive land	**Reject** *There are appropriate exemptions under the NPS-HPL to rezone small portions of highly productive land where the*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
					relevant statutory tests have been satisfied (para.5.3.13 & para.6.3.33).
				Adverse effects on natural values	**Reject** *The evidence establishes that the ODP provides opportunities to enhance habitats within the site to support ecology, natural values and birdlife that would contribute to the natural values of the wider area (para.5.10.7).*
				Adverse character and amenity effects	**Accept** *The evidence establishes that PPC23 as notified may compromise the existing character and amenity of the area and give rise to adverse visual effects (para.5.5.19).*
		S71.2	Oppose	If approved, amend the CDP to require a non-complying activity consent where any subdivision is inconsistent with the ODP	**Reject** *The additional development controls aren't supported by the evidence (para.5.5.21).*
		S71.3	Oppose	If approved, provide for subdivision as a restricted discretionary activity where subdivision is consistent with the ODP	*The additional development controls aren't supported by the evidence (para.5.5.21).*
		S71.4	Oppose	If approved, an ODP to CDP Appendix 8.4.1.2	*The additional development controls aren't supported by the evidence (para.5.5.21).*
		S17.5	Oppose	If approved, include references to the accessibility network required to be established by the ODP requirements as CDP objectives and policies	**Accept in part** *PPC23 as notified does not support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
Penelope Hargreaves	**S72**	**S72.1**	Oppose	Flood risk	**Accept** *PPC23 as notified does not address the concerns raised in the evidence that the natural hazard risks have been identified and can be effectively mitigated (para.5.8.19).*
				Adverse effects on natural values	**Reject** *The evidence establishes that the ODP provides opportunities to enhance habitats within the site to support ecology, natural values and birdlife that would contribute to the natural values of the wider area (para.5.10.7).*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
				Adverse transport effects	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
				Property impacts - Rates	**Reject** *There is no RMA scope to consider the impacts of the rezoning on property values, insurance premiums, maintenance costs or LGA rates increases (para.5.11.4 to 5.11.7).*
Tamara Watson Wells	**S73**	**S73.1**	Oppose	Flood and tsunami risk	**Accept** *PPC23 as notified does not address the concerns raised in the evidence that the natural hazard risks have been identified and can be effectively mitigated (para.5.8.19).*
				Adverse transport effects	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
				Adverse nuisance effects – Light spill and noise	**Reject** *The CDP includes appropriate provisions to manage nuisance effects, including light spill and noise, at the time of subdivision (para.5.6.33).*
				Adverse effects on cultural values	**Reject** *No sites of interest have been identified, it is a highly modified site, and standard discovery protocols can manage the discovery of sites or values of interest (para.5.10.5).*
		73.2	Oppose	If approved, limit the number of households to 165 or require a road connection to Lower Styx Road with associated landscape mitigation	**Accept in part** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20). The Proponent has been requested to investigate establishing a road connection to Lower Styx Road (para.1.1.8). The additional development controls aren't supported by the evidence (para.5.5.20).*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
		73.3	Oppose	If approved, low-level lighting is required	**Reject** *The CDP includes appropriate provisions to manage nuisance effects, including light spill, at the time of subdivision (para.5.6.33).*
		73.4	Oppose	If approved, cultural and heritage protection is put in place prior to construction works commencing	**Reject** *No sites of interest have been identified, it is a highly modified site, and standard discovery protocols can manage the discovery of sites or values of interest (para.5.10.5).*
		73.5	Oppose	If approved, appropriate infrastructure is established to service the development	**Accept in part** *The evidence establishes that the site can be serviced with potable water and reticulated wastewater connections (para.5.6.12).* *PPC23 as notified does not establish how stormwater can be effectively managed or that any related adverse effects can be effectively mitigated (para.5.8.18 & para. 5.8.19).*
Michael Wells	**S74**	**S74.1**	Oppose	Adverse transport effects	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
				Natural hazard risk	**Accept** *PPC23 as notified does not address the concerns raised in the evidence that the natural hazard risks have been identified and can be effectively mitigated (para.5.8.19).*
				Water supply capacity	**Reject** *The evidence establishes that the site can be serviced with potable water (para.5.6.12).*
				Adverse character and amenity	**Accept** *The evidence establishes that PPC23 as notified may compromise the existing character and amenity of the area and give rise to adverse visual effects (para.5.5.19).*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
John Messerly	**S75**	**S75.1**	Oppose	Flood and tsunami risk	**Accept** *PPC23 as notified does not address the concerns raised in the evidence that the natural hazard risks have been identified and can be effectively mitigated (para.5.8.19).*
				Natural hazard risk – Tsunami evacuation	**Accept in part** *There is sufficient network capacity to ensure traffic heading inland will be able to make a timely evacuation and ODP requirement for road designs to support safe egress during hazard events (para.5.7.10 and Appendix 3).*
				Adverse transport effects	**Accept** *PPC23 as notified does not support a safe and efficient transport network (para.5.7.8) or support the necessary levels of accessibility (para.5.7.19 & 5.7.20).*
				Adverse nuisance effects	**Reject** *The CDP includes appropriate provisions to manage nuisance effects, including those relating to construction phase development works, at the time of subdivision (para.5.6.33).*
				Water and wastewater capacity	**Reject** *The evidence establishes that the site can be serviced with potable water and reticulated wastewater connections (para.5.6.12).*
				Stormwater management	**Accept** *PPC23 as notified does not establish how stormwater can be effectively managed or that any related adverse effects can be effectively mitigated (para.5.8.18 & para. 5.8.19).*
				Inconsistency with the NPS-UD, NPS-FWM, CRPS and CDP	**Accept** *PPC23 as notified does not represent a "well-functioning urban environment" under the NPS-UD (para.6.3.18), the NPS-FWM (para.6.3.38), CRPS (para.6.3.47) or the CDP (para.7.1.2).*

Submitter	Submission No.	Decision No.	Request	Decision Sought		Recommendation and Reasons
				Adverse effects on natural values and the river		**Reject** *The evidence establishes that the ODP provides opportunities to enhance habitats within the site to support ecology, natural values and birdlife that would contribute to the natural values of the wider area (para.5.10.7).*
				Adverse effects on cultural and historic values		**Reject** *No sites of interest have been identified, it is a highly modified site, and standard discovery protocols can manage the discovery of sites or values of interest (para.5.10.5).*
				Human health - Contaminated land		**Reject** *Any risks to human health can be effectively managed by the NESCS consenting regime (para.5.8.7).*
				Adverse character and amenity effects		**Accept** *The evidence establishes that PPC23 as notified may compromise the existing character and amenity of the area and give rise to adverse visual effects (para.5.5.19).*
				Property impacts – land is insurable		**Reject** *There is no RMA scope to consider the impacts of the rezoning on property values, insurance premiums, maintenance costs or LGA rates increases (para.5.11.4 to 5.11.7).*
			Further submission No.	**Further Submitter**	**Support / Oppose**	
			FS01	T Wells	*Support*	**Accept, accept in part and reject** *Reasons as above.*
			FS02	H & G Nimmo	*Support*	**Accept, accept in part and reject** *Reasons as above.*
		FS75.2	**Oppose**	Alternate relief – Additional flood modelling is provided and peer reviewed		**Accept** *The additional technical assessments listed in paragraph 1.1.8 are required to substantiate the effects of the rezoning and establish appropriate mitigation where necessary (para.5.2.5).*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
				Alternate relief -Additional transport assessments are provided and peer reviewed	**Accept** *The additional technical assessments listed in paragraph 1.1.8 are required to substantiate the effects of the rezoning and establish appropriate mitigation where necessary (para.5.2.5).*
				Alternate relief -Additional geotechnical assessments are provided and peer reviewed	**Accept** *The additional technical assessments listed in paragraph 1.1.8 are required to substantiate the effects of the rezoning and establish appropriate mitigation where necessary (para.5.2.5).*
				Alternate relief – An evacuation travel time model is provided and peer reviewed	**Reject** *There is sufficient network capacity to ensure traffic heading inland will be able to make a timely evacuation and ODP requirement for road designs to support safe egress during hazard events (para.5.7.10 and Appendix 3).*
		FS75.3	**Oppose**	If approved – Rezone lower terrace to a conservation zone that includes a widened riparian corridor and stormwater basins relocated out of the High Flood Hazard Area	**Reject** *The evidence does not establish the need for additional development controls to protect natural values, including a conservation one that is already achieve through the ODP overlays (para.5.10.7).* **Accept in part** *The relocation of the stormwater basins may reduce the concerns raised in the evidence (para.5.6.18 & 5.6.19), which will be determined based on the Proponent's response to the items listed in paragraph 1.1.8.*
		FS75.4	**Oppose**	Alternate relief – That the applicant maps the Qualifying Matters, provides a complete section 77L evaluation and related MDRS assessments	**Reject** *The appropriateness of applying the Qualifying Matters to the site, including the further requirements listed in section 77L, has been demonstrated by the Proponent in PPC23 (para.5.8.22).*
		FS75.5	**Oppose**	Alternate relief – Cultural, archaeological and mahinga kai assessments are provided	**Reject** *No sites of interest have been identified, it is a highly modified site, and standard discovery protocols can manage the discovery of sites or values of interest (para.5.10.5).*

Submitter	Submission No.	Decision No.	Request	Decision Sought	Recommendation and Reasons
		FS75.6	**Oppose**	Alternate relief -An infrastructure funding plan with associated requirements are satisfied	**Reject** *The CDP includes appropriate provisions to manage nuisance effects, including those relating to construction phase development works, at the time of subdivision (para.5.6.33).*
		FS75.7	**Oppose**	Alternate relief -Insurance modelling and related requirements are satisfied	**Reject** *There is no RMA scope to consider the impacts of the rezoning on property values, insurance premiums, maintenance costs or LGA rates increases (para.5.11.4 to 5.11.7).*
		FS75.8	**Oppose**	Alternate relief -A retail distribution effects assessment is provided and peer reviewed	**Reject in part** *The evidence establishes that the Neighbourhood Centre is unlikely to give rise to adverse retail distribution effects, but additional assessments are required to substantiate the economic costs and benefits (para.5.4.19 & para.5.4.20).*
		FS75.9	**Oppose**	Alternate relief -The complete suite of assessments under the NES-CS are provided, including a public health risk assessment and regional consenting feasibility analysis	**Reject** *Any risks to human health from contaminated soils can be effectively managed by the NESCS consenting regime (para.5.8.7).*
		FS75.10	**Oppose**	Alternate relief – Require the applicant to engage with mana whenua with associated requirements	**Reject** *There is no duty for the Proponent to consult with landowners or mana whenua (para.5.2.4)*
		FS75.11	**Oppose**	Alternate relief – Resolve procedural defects, including in respect to the Section 32 evaluation, consistency with the CLWRP, and incomplete technical assessment	**Accept** *The additional technical assessments listed in paragraph 1.1.8 are required to substantiate the effects of the rezoning and establish appropriate mitigation where necessary (para.5.2.5).*
		FS75.12	**Oppose**	Alternate relief – A school safety travel plan, construction management plan, transport emissions assessment, firefighting water supply assessment and related evaluations are provided and peer reviewed	**Reject** *The additional technical assessments listed in paragraph 1.1.8 are required to substantiate the effects of the rezoning and establish appropriate mitigation where necessary (para.5.2.5).*

APPENDIX 5 – REVIEW OF PPC23 AND SUBMISSIONS RELATED TO URBAN DESIGN MATTERS

BY JOSIE SCHRÖDER, URBAN DESIGNER/DIRECTOR AT URBAN OPERA

BEFORE INDEPENDENT HEARING COMMISSIONERS IN CHRISTCHURCH

TE MAHERE Ā-ROHE I TŪTOHUA MŌ TE TĀONE O ŌTAUTAHI

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the hearing of submissions on Private Plan Change 23 Whisper Creek, Spencerville to the Christchurch District Plan

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STATEMENT OF PRIMARY EVIDENCE OF JOSEPHINE SCHRÖDER ON BEHALF OF CHRISTCHURCH CITY COUNCIL

Dated: 10 April 2026

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EXECUTIVE SUMMARY

1. My full name is Josephine (Josie) Frederika Jane Schröder. I am the Director/Urban Designer of Urban Opera NZ Ltd, an urban design consultancy.

2. I have prepared this statement of evidence on behalf of the Christchurch City Council (the **Council**) in respect of urban design matters arising from the material provided and further information requests regarding Private Plan Change 23 Whisper Creek (**PPC23**) to the Christchurch District Plan (the **District Plan**).

3. In my evidence I have primarily responded to the Urban Design Assessment provided by Mr Compton-Moen and the various submitters to the PPC23. I have also drawn on the evidence of other discipline experts, acting on behalf of the Council, including Mr Smith, Ms Smetham and Mr Yeoman.

4. My evidence focuses on urban form and urban design outcomes of the proposal.

5. My evidence responds to whether, in respect to urban design and urban form outcomes, the:

   (a) rezoning to the proposed Residential New Neighbourhood Zone (**RNNZ**) is appropriate.

   (b) associated District Plan provisions, including the proposed Outline Development Plan (**ODP**), will be effective in the delivery of a well-connected urban area.

   (c) the methodology applied to integrate the rezoning into the surrounding environment is appropriate.

   (d) alternate relief sought by the submitters is appropriate and whether additional advice is required from the Applicant to ensure the rezoning is appropriate.

6. I have reviewed the Urban Design Assessment (**UDA**) of Dave Compton-Moen of DCM Urban Ltd prepared on behalf of the Applicant. I am not in full agreement with his appraisal of the proposal in respect to urban form and urban design outcomes.

7. The following are key areas of concern that I consider significant and need addressing regarding urban design and urban form outcomes of the proposal.

8. They are:

   (a) The level of accessibility and quality of access for future residents in meeting their day-to-day needs, including access to services and facilities not provided within the settlement.

   (b) Recognition of the context and character of the proposal as a standalone "urban village"[1] or alternatively "high amenity rural village" [2] within the ODP and associated narrative.

   (c) The integration of the proposal within the existing environment, including interface treatments, as they relate to urban design. This includes the question as to whether the proposal will remain a standalone settlement or should be considered in the context of a future urban growth area.

   (d) The level of connectivity provided within the proposed settlement, including the availability of pedestrian and cycle access, and visual and physical access to local reserves.

   (e) The location identified for the village commercial centre and the likely viability of this centre.

9. I have the following recommendations:

   (a) Inclusion in the ODP (*Appendix ii: Proposed ODP Amendments)* of:

[1] 2nd RFI letter 06/08/2025 pg 9, 8.10.3X.C a. 6.
[2] Section 32, pg 11, 3.3 a.

i. Additional cycle/pedestrian links within the proposed settlement, and associated greenspace links to external roads.

ii. Additional cycle/pedestrian connection to provide a more direct path from the neighbourhood centre to recreation routes, and a future direct connection to Spencerville.

iii. Relocation of one of the three required reserves in the north-west area of the upper terrace.

iv. Relocation of the neighbourhood centre.

v. Indicative future road link to Lower Styx Road.

(b) Inclusion in the ODP narrative of:

i. Staging which includes early provision of the land allocation for the neighbourhood centre.

ii. Amendment to more strongly support the village character - "the character is that of an urban village, including the provision of a **coherent layout** including landmark buildings and features, **centrally located publicly accessible open space**, ~~inclusion of the~~ ~~while providing for a~~ meaningful diversity **in site size, building typologies and height, which promote visual interest, choice and opportunity for home-based businesses that serve the needs of the community.** ~~of residential building scales, types and styles".~~.

iii. Provision of building typologies that include standalone housing, duplex, terrace and apartment typologies for whole-of-life housing choice and to promote diversity.

iv. Subdivision to be undertaken in accordance with Ngāi Tahu subdivision and development guidelines.

v. Variation in building height (between one and two storey) and internal setbacks (to provide for a distance of at least 6m) between buildings fronting Spencerville Road and Turners Road.

10. I am unable to support the proposal in its current form in respect to achieving desirable urban form and urban design outcomes. I consider that the location of the proposal does not adequately meet accessibility requirements identified that are reflective of good urban design practice.

11. In addition, I do not consider that the settlement as proposed in PPC23 via the ODP and associated narrative will give effect to the principles of good urban design outlined in CRPS 6.3.2 including the effective integration with the existing environment and adequately addressing tūrangawaewae, amongst other urban form and design principles.

INTRODUCTION

12. My name is Josie Schröder. I am the Director/Urban Designer of Urban Opera NZ Ltd, an independent urban design consultancy based in Ōtautahi Christchurch. I have been a practicing urban designer for 25 years.

13. I have been engaged by the Council to prepare evidence in relation to urban form and urban design outcomes for PPC23.

14. In preparing this evidence I have:

    (a) Reviewed the following documents:

        i. Appendix F: Landscape Visual Impact Assessment prepared by David Compton-Moen of DCM Urban Ltd.

        ii. Appendix G: Urban Design Assessment prepared by David Compton-Moen of DCM Urban Ltd.

        iii. Appendix F (i): Graphic Attachment (Revision J) prepared by DCM Urban Ltd.

        iv. Appendix K: Plan change text.

        v. Appendix I: Preliminary cultural report.

        vi. Urban design-related Request for Information (**RFI**) responses.

        vii. Summary of submissions prepared by the Council and submissions pertinent to urban form and urban design outcomes.

    (b) Undertaken two site visits, the latest being on 12 March 2026, accompanied by the Applicant.

15. This evidence should be read in conjunction with that of Nikki Smetham, Landscape Architect, David Smith, Transport Planner, and Rodney

Yeoman, Economist, all of whom are providing evidence on behalf of the Council, and whom I reference in my evidence.

16. I am authorised to provide this evidence on behalf of the Council.

Qualifications and Experience

17. I have practiced as an urban designer for over 25 years in both the public sector and in private practice. Prior to my current role I was employed as Principal Advisor Urban Design at Christchurch City Council until March 2023, for approximately 12 years.

18. I hold the qualifications of a Master of Arts in Urban Design (Oxford Brookes University, UK), Bachelor of Planning (Hons, University of Auckland, NZ) and an Advanced Certificate in Landscape Design (Unitech, NZ).

19. I am a Registered Urban Designer (UDIA) and Deputy Chair of that Institute, a Registered Practitioner of Urban Design (UK) and a full member of the New Zealand Planning Institute. I am a current member/chair of the Nelson/Tasman Urban Design Panel.

20. I have received accredited training in and have undertaken Crime Prevention Through Environmental Design (**CPTED**) assessments.

21. My experience in reference to Private Plan Change 23 includes the provision of the following urban design expertise:

    (a) Urban strategies, policy and spatial plans on behalf of Christchurch City Council including to the Greater Christchurch Spatial Plan and Canterbury Regional Policy Statement (**CRPS**) and specifically Policy 6.3.2.

    (b) Christchurch City and District Plans, including the District Plan Review, and specifically residential and subdivision chapters, including the development of policy and provisions, and lead urban designer for the Council in developing the structure of the ODP's and providing guidance to their preparation.

(c) The Christchurch Independent Hearings Panel (**IHP**) as an expert witness for the District Plan Review, on the residential, specific purpose and subdivision chapters.

(d) The research and preparation for Plan Change 14, the Christchurch City Council response to the National Policy Statement on Urban Development (**NPSUD**), including the development of policy and provisions.

(e) The preparation of Infrastructure Development Standards / Code of Practice to Tauranga City Council, Thames-Coromandel District Council and Christchurch City Council.

(f) Large-scale greenfield residential and industrial development such as Northwood, Awatea, Halswell Commons, Prestons North, Milnes Park, in Ōtautahi Christchurch, and Wairakei, The Lakes and Tauriko in Tauranga Moana. This included pre application advice, assessment, and in many cases post-consenting implementation advice.

(g) The preparation of context and visual assessments and urban design peer review, most recently for the Council and Waimakariri District Councils.

(h) Preparation of design guides including oversight, industry engagement and review of the Creating New Neighbourhoods Design Guide for the Residential New Neighbourhoods Zone.

Code of Conduct

22. While this is a Council hearing, I have read the Code of Conduct for Expert Witnesses (contained in the 2023 Practice Note) and agree to comply with it. Except where I state I rely on the evidence of another person, I confirm that the issues addressed in this statement of evidence are within my area of expertise, and I have not omitted to consider material facts known to me that might alter or detract from my expressed opinions.

Scope of Evidence

23. I have been asked by the Council to address the following urban design matters in respect to the assessment of the Proposal:

    (a) The Proposal and its context.

    (b) Review the UDA of Mr Compton-Moen of DCM Urban Ltd.

    (c) Review the efficacy of the proposed ODP and the proposed provisions in achieving desirable urban form and urban design outcomes.

    (d) Whether the methodology applied to integrate the rezoning into the surrounding environment is appropriate to deliver a well-connected and attractive urban area.

    (e) Alternate relief sought by submitters in respect to urban design matters and the extent to which this may be appropriate.

24. I address each of these matters below. As is the nature of urban design, my evidence traverses that of several disciplines including landscape architecture, transport planning and economics. As such and as stated previously, I have drawn on the evidence of other discipline experts, acting on behalf of the Council, including Mr Smith, Ms Smetham and Mr Yeoman. The latter is in respect to the viability of the proposed commercial centre.

THE PROPOSAL AND ITS CONTEXT

25. The proposal and its context are described in the UDA of Mr Compton-Moen (pg 2, paras 2-3). I understand this to be correct. Further context is provided in Appendix F (i) – including a proximity map, context map and landscape assessment, also prepared by Mr Compton-Moen. I would anticipate however that an acceptable context and site analysis would also include matters such as:

(a) Realistic distances rather than indicative distance circles to services and schools (time travelled/distance) given the importance of accessibility to this proposal

(b) Features of the area i.e. views to the Port Hills, character elements such as existing building styles within the area, natural values, landmarks and other references that contribute to character of the proposal.

(c) Site features such as topography, water features, existing buildings, stands of trees, views from the site etc to resolve the question of how the proposed development was structured, orientation of the pattern of development, why medium density development is appropriate to this location generally, not just the site identified as part of the graphic package etc.

26. All of these matters overlay and form a picture of the area, beyond just how aspects might be mitigated. Ms Smetham has further concluded in her evidence[3] that the description of landscape context provided by Mr Compton-Moen is deficient (paraphrased) and identifies some of the shortcomings, including matters that contribute to the character and cultural context.

27. In addition, Appendix F (i) also contains the proposed rezoning, proposed ODP, indicative masterplan and indicative scheme plan. I reference Appendix F (i) in my evidence.

28. In summary, the proposal is for the rezoning of approximately 170ha of land from Rural Urban Fringe Zone (**RuUFZ**) and Specific Purpose (Golf Resort) Zone (**SPRZ**) to RNNZ.

29. The land (site) is in multiple ownership and is approximately 10km north of the Christchurch city centre. The rezoning is intended to enable a residential settlement of approximately 800 lots, a small commercial

[3] Statement of Primary Evidence of Nicola Smetham pg 13, para 57

centre (up to 3,000m^2 or approx. 1000m^2 GFA), access, reserves and greenspace.

30. Throughout my evidence I refer to the proposed rezoning as a 'settlement'. I consider it is independent from existing suburban development at some 2.5km (as the crow flies), not a comfortable walking distance[4], from the settlement's proposed neighbourhood centre to the northern extent of Prestons North, the closest suburb of Christchurch. Further the settlement is separated from Spencerville to the north-east by the Pūharakekenui/ Styx River and associated floodplain, with no direct access provided.

31. My evidence is based on the inclusion of the rezoning of all the properties identified[5]. I recognise that the four, approximate four hectare lots to the north of the settlement are not in the ownership of the Applicant. However, I consider these lots integral to achieving an appropriate and functional future development pattern, if rezoned to RNNZ.

URBAN DESIGN ASSESSMENT

32. I have reviewed the UDA of Mr Compton-Moen (Revision C). I have drawn on the UDA in respect to the existing site character (pg 2). I have considered the effects on urban design matters (pgs 2 and 3), including the table identifying the differences in zone provisions (pg 3), such as building setbacks and site sizes. I do not consider that the effects outlined are a full inventory, which I discuss further in this review, and in reference to the evidence of Ms Smetham.

33. I also reference Appendix F (i) regarding the methodology applied to integrate the proposed rezoning into the surrounding environment.

34. In respect to relevant objectives and policies, I have found the UDA of limited value to my review of PPC23 and the associated urban design matters. Mr Compton-Moen's evaluation primarily references the

[4] Planning Officer's Section 42A Report pg 78 para 6.3.11
[5] Appendix F (i) pg 8 Ownership Plan

indicative scheme plan, rather than the ODP, associated narrative and provisions proposed for PPC23.

35. I agree that indicative scheme plans can provide context and visualisation of possible options for development. However, in my experience scheme plans are generally modified, sometimes significantly, over the life of the concept development process, post plan change. Local examples include Prestons North, Northwood and Halswell Commons. Key elements of the proposals included concepts such as greenways, the location and size of the commercial centre, or the inclusion of apartment buildings and more intensive housing development. These aspects were not fully realised in the development outcomes of neighbourhoods to the extent anticipated.

36. I agree however with Mr Clease[6] that more detailed aspects of a proposal that give effect to the principles of good urban design are often not enacted until the point of subdivision and building development, for example site orientation. I also agree that the District Plan rules and RNNZ design guidelines are central to ensuring good urban design outcomes.

37. However, as I discuss further in this evidence regarding the ODP and associated narrative, there is a balance needed that ensures sufficient guidance is provided at the outset within the ODP, narrative and provisions as part of the plan change to meet the intentions for the future development of an area.

38. In addition, while I agree with Mr Clease[7] that the RNNZ rules should provide sufficient direction to the development of new neighbourhoods, the provisions were not developed or geared towards the delivery of village character in the context of a rural environment, as proposed. I also note that the RNN design guidelines are non-statutory.

[6] 1st RFI Response 07/07/2025 pg 2
[7] Ibid

Areas of Agreement

39. In respect to the UDA of Mr Compton-Moen, I generally agree with the following matters in respect to his assessment:

(a) The context analysis provided in so far as it extends, noting that features both within and beyond the site, such as view shafts, have not been fully addressed in this analysis. I defer to Ms Smetham for detailed analysis in respect to the landscape context.

(b) That the proposed settlement is well-connected to the adjacent area by the existing road network, except for Lower Styx Road where a cycle/ pedestrian connection only is to be provided.

(c) There is a good level of recreation opportunity within the vicinity of the site. This includes potential connections to open space and for recreational cycling and walking.

(d) The proposed settlement is in proximity to Spencerville, albeit with indirect access (both existing and proposed) and is separated by Pūharakekenui/ Styx River and the floodplain.

(e) The site offers the opportunity to incorporate and support existing landscape features, greenspace and biodiversity outcomes, well-connected to the proposed residential use.

(f) Reserves will largely be within walking distance (400m) of residential development within the settlement.

(g) Within the SPRZ "*the proposal will introduce urban residential form to the proposal site, which will be markedly different from the current rural form that exists on the site", and that "the rezoning will result in a higher intensity of development compared to the existing land use"* (Appendix G - Urban Design – pg 5).

(h) The SPRZ zoning indicates that the location is at least in part suitable to undergo development, and that "*residential development [proposed] notably differs from a golf course development"*. Mr

Freidel[8] in his evidence considers the SPRZ is an urban zone. I have relied on this interpretation of the zone.

(i) The summary of 'general distinctions anticipated' noted by Mr Compton-Moen (pg 5) in reference to the RuUFZ**,** SPRZ and RNNZ. These include variation in building setbacks, building height, site area and site coverage.

(j) There are semi-rural settlements within Christchurch city's surrounds and more generally across Canterbury which are similar or smaller in size to that of the proposal. However, I consider they have characteristics that are not present in this proposal, which I discuss in further detail in this evidence.

(k) The interface of the settlement could integrate within its location to a degree. While the interface treatment between the existing rural environment and the settlement, including the combination of a deeper building setback and proposed landscape planting strip will create a physical and perceptual barrier, there are opportunities to mitigate this to an extent. I note however that Ms Smetham in her evidence[9] considers that the proposed mitigation is not sufficient to provide a suitable interface with the RuUFZ .

Areas of Disagreement

40. In my opinion Mr Compton-Moen has generally overstated the urban design benefits of the proposed settlement resulting from the rezoning to RNNZ, which he has based on the indicative scheme plan and masterplan, rather than the ODP and associated provisions. I also consider urban design matters have been conflated in Mr Compton-Moen's UDA, through his assessment of the NZ Urban Design Protocol 7 C's.

[8]Planning Officer's Section 42A Report pg 30 para 5.3.6
[9] Statement of Primary Evidence of Nicola Smetham pg 35, para 146

41. I consider that:

(a) The proposal does not appear consistent with prevailing urban development patterns within the Christchurch District as stated. In my opinion the prevailing pattern is the extension of existing suburbs and settlements rather than new pockets of development. The proposal is largely isolated by rural land and the Pūharakekenui / Styx River, rather than an extension of an existing urban area.

(b) The change to a higher intensity of development as currently proposed is not appropriate. Accessibility and proximity have been overstated, and rather than creating a well-connected, walkable neighbourhood, the proposal will in effect be an isolated car-dependent dormitory suburb with limited access to day-to-day needs.

(c) Further, with the proposed design response to the adjacent RuRFZ, the density of development to the interior of the settlement, to meet the 15hh/ha, will present as highly urbanised, within a rural context, unless innovative design solutions in respect to the provision of open space, landscape quality and building form and typology are applied.

(d) I support Mr Smith's recommendation[10] that a multi-modal integrated transport assessment is undertaken to further assess accessibility and connectivity, including any potential means of improving it such that it is acceptable. Potentially these means, in association with the additional connections and modifications recommended by Mr Smith[11], and those I have noted within my evidence, may alleviate or resolve these matters. However, at this time, I do not consider that as proposed a sufficient level of accessibility and connectivity will be achieved.

(e) A small neighbourhood centre is proposed which is positive in respect to providing some local services, a focus and meeting place

[10] Statement of Primary Evidence of David Smith pg 1, 5. (e)
[11] Ibid pg 2, 6.

for the settlement and contributing to a "village character". However, the commercial and community offer will be limited, with the evidence of Mr Yeoman suggesting that 3-4 small shops and a preschool may be supported but questioning the viability of the scale of the centre as proposed[12]. I consider a neighbourhood centre is vital to achieving a village character. Without it, and the additional design/functional elements I have discussed elsewhere in this evidence, I consider the proposal will be a subdivision rather than urban village, albeit with limited accessibility.

(f) Reserves are located on the lower terrace only, limiting the ability to provide visual relief to the extent of proposed housing on the upper terrace. I consider this would assist in the integration with the surrounding existing rural environment, as well as providing amenity to residents and reinforcing a village character. I understand that Mr Barnes, the Council's parks expert, considers the location and number of reserves adequate[13]. However, he also confirms that a change in location to that I have proposed (*Appendix ii: Proposed ODP Amendments*) will not compromise the any parks planning provision matters.

(g) Aside from the opportunities presented through the regeneration and development of the flood plain and Pūharakekenui/ Styx River, there is little to indicate how the proposal reflects and enhances the character and cultural values of the area. The context and landscape analysis did not identify elements such as character features beyond the site, for example the Port Hills, that might be utilised as structuring element of the proposal.

(h) It is noted that this may be further developed at the subdivision stage. However, an indication of how this may be sought, beyond that currently provided by the proposed ODP text would be beneficial to address my concerns, those of Ms Smetham and those raised by

[12] Statement of Primary Evidence of Rodney Yeoman pg 23, para 90
[13] Statement of Primary Evidence of Peter Barnes, pg 6, para 25

submitters in respect to character and culture. The preliminary cultural report[14] recommends that "the subdivision is to be undertaken in accordance with Ngāi Tahu Subdivision and Development Guidelines…". I recommend that this reference be incorporated into the ODP narrative.

42. In summary I do not fully agree with the conclusions of Mr Compton-Moen in respect to achieving desirable urban form and urban design outcomes. These matters are discussed in more detail with reference to the policy framework and provisions. I have outlined recommended changes to address these matters where I consider they could be better resolved.

CONSISTENCY WITH THE POLICY FRAMEWORK

43. I have undertaken the following evaluation as to whether the proposed ODP**,** associated narrative and provisions are consistent with the policy framework. This is based on a review of the design intentions against core design principles to establish whether the former will be effective in achieving desirable urban form and urban design outcomes.

44. In undertaking this evaluation, I have drawn from the UDA of Mr Compton-Moen where relevant to the ODP and associated provisions, and the evidence of Mr Smith, Mr Yeoman and Ms Smetham where appropriate. I have addressed the urban design outcomes external to the settlement and those within the settlement.

45. I have relied on Appendix F (i) (Revision J) as the most up to date proposed ODP for the visual representation of the proposal, and PPC23 2nd RFI letter dated 6.08.2025 for the relevant District Plan text and narrative.

[14] Appendix I – Cultural Preliminary Report 20/01/2022 pg 7

Policy Framework

46. The NPSUD Policy 1: states that *"Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum: (c)* ***have good accessibility*** *(my bold) for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport".*

47. The CRPS Policy 6.3.2 - Development form and urban design and the NZ Urban Design Protocol (2005) 7C's, utilised by Mr Compton-Moen in his UDA**,** are very similar in nature in respect to the intended urban outcomes. The 7C's were used as a basis for the principles of good urban design identified in Policy 6.3.2 but updated, and with more focus on land development outcomes rather than urban design process, as is included in the 7C's.

48. I have utilised NPSUD Policy 1 (c) and Policy 6.3.2 principles (Appendix i of this evidence) of good urban design as key themes in respect to evaluating whether the ODP and associated provisions support desirable urban form and urban design outcomes.

49. Mr Compton-Moen has further responded to Chapter 14 RNNZ Objectives and Policies in his UDA. This response is primarily in reference to the indicative scheme plan. I have limited my evaluation to the ODP, associated narrative and provisions. However, I have referenced the indicative masterplan and scheme plan to illustrate matters related to the ODP and narrative.

50. In response to RFI matters, the ODP narrative[15] has been amended to incorporate suggested recommendations to give greater effect to the outcomes of the ODP. These include matters related to tūrangawaewae, accessibility, connectivity and integration and safety:

[15] Appendix K Plan Change Text updated 05/09/2025

- The response to provide for potential future land use change i.e. site size for future subdivision and to incorporate access (8.10.3X.C 2.).

- Inclusion of a reference to urban village (8.10.3X.C 6.) and (8.10.3X.D 6.) to the 'overall character' of the urban area'.

- Incorporation of a neighbourhood centre as a 'focal point' and its associated size, and which is accessible via pedestrian paths (8.10.3X.D c.).

- Aspects of design quality including safety in relation to pathways and their location (8.10.3X.D e.).

- Additional pedestrian/cycle connections (8.10.3X.D f. & g.).

51. I consider that these amendments are generally positive in being more explicit than previously proposed regarding urban design outcomes. I am supportive of their intent, while noting, as I discuss further in this evidence, that there are conflicts in outcomes sought.

52. Further, as discussed in more detail below, given the location and objectives of the proposal I consider further certainty is required than is currently provided through the ODP and narrative of what the proposal will deliver in respect to village character.

Tūrangawaewae

53. The proposition of the Applicant is that the settlement is an *'urban village'*, albeit located within a rural context. A *'high amenity rural village'* has also been referenced[16]. I have considered what might constitute a village either urban or rural and whether the combination of the ODP and narrative provides sufficient guidance to deliver on this.

54. The narrative includes the following descriptor in reference to form and design *"the character is that of an urban village, including the provision of*

[16] S32 pg 11, 3.3 a.

landmark features and a coherent design, while providing for a diversity of residential building scales, types and styles".

55. Within the evidence of Mr Yeoman[17] several settlements within the wider context of Christchurch have been referred to in response to the Application S32. Mr Friedel[18] also notes the equivalency of 800hh/ha to that of Oxford or Diamond Harbour as examples.

56. In exploring the concept of a village in the Canterbury context, both urban and rural, and including Templeton and Tai Tapu, I have identified consistent traits that these settlements demonstrate for the most part. These include:

- Location at crossroads, or intersection of significance.
- Provision of a variety of services to the hinterland or the surrounding neighbourhood.
- Provision of housing and services for an associated industry / business / organisation within the vicinity.
- A range of community activities and/or spaces that may include a combination of community hub, pub, playcentre, school, church or sports club.
- Incorporation of open space within the residential cluster, and associated tree planting within the settlement.
- Incremental growth over time leading to variation in lot and dwelling sizes and typologies, and opportunities for larger private open space and vegetation.
- A relatively firm edge between the settlement boundary and rural surrounds (if in a rural context), with settlement that is not hidden from view of the wider area.

[17] Statement of Primary Evidence of Rodney George Yeoman pgs 23-24
[18] Planning Officer's Section 42A Report pg 32 para 5.3.14

57. My concern with the ODP and associated narrative as proposed is twofold. First, that the settlement will not realise the characteristics of a rural or urban village, but will rather result in effectively a contained subdivision, largely hidden from view that does not respond to its context.

58. A neighbourhood centre is indicated on the ODP and in the associated narrative which is positive. In discussion with Mr Smith, however, I recommend that the location identified in the ODP be reconsidered. As identified in *Appendix ii: Proposed ODP Amendments* relocation of the neighbourhood centre to the intersection of the indicative collector roads would:

- Align the centre more closely with the highest level of traffic movement, including cycle and pedestrian activity.
- Increase the visibility of the neighbourhood centre from the intersection with Turners Road to increase profile.
- Remove the centre from the potential inside bend, which could make access more difficult.
- Should development of the 4 x 4ha sites take longer to achieve, the relocation may provide an easier option to develop the centre.
- Allow for more functional interfaces from a design perspective with adjacent land use (rather than potentially a stormwater facility).

59. The ODP narrative[19] states that a neighbourhood centre is to be provided. However, there are no attributes as to what would be incorporated in the neighbourhood centre, for example publicly accessible open space, meeting opportunities, commercial activities or communal buildings and the like, given that the settlement is based on the ideology of a village. These are elements that are not discussed in any detail in the RNNZ design guidelines, which I now consider an omission. In addition, these

[19] 2nd RFI Response Letter 06/08/2025 pg 10, 8.10.3X.D c.

matters are not included within the consenting framework guided by the NCZ.

60. I am concerned that should no neighbourhood centre, and associated amenities, be provided, the proposal will simply result in an isolated suburb, rather than a village context. In Christchurch, there have been several neighbourhood centres proposed, for example Northwood and Aidanfield, that are central to a new development, but that were not realised due to a lack of viability. The opportunity was then lost to housing.

61. No staging is provided as part of the ODP. I consider that early staging that incorporates allocation of land area to the neighbourhood centre is required, with a caveat on that land that it must be retained for the purposes of community activity for a given period i.e. 10 years, so as not to lose the opportunity for the centre. I consider this should be included within the ODP narrative.

62. I defer to the evidence of Mr Yeoman in respect to the viability of this approach, but without the neighbourhood centre, I consider this will further detract from the village character sought, and tūrangawaewae in respect to residents. I recommend that a staging plan be incorporated within the ODP and referenced in the narrative, that identifies the neighbourhood centre in the initial stages of the development, should the plan change be adopted.

63. The ODP (and indicative masterplan) identifies the settlement as one extensive area of residential development on the upper terrace, potentially uninterrupted except for the neighbourhood centre, a stormwater facility and streets. Reserves are allocated to the lower terrace adjacent to stormwater facilities.

64. This limits the opportunity on the upper terrace for play and passive recreation that is well-overlooked, is adjacent to residential units and forms part of the village atmosphere, providing a strong structuring element. In addition, this also limits characteristics such as clusters of tree

planting and open space that visually break up the built form within blocks and across the settlement.

65. Second, as I understand it, the upper terrace is intended to be raised in parts up to 1.5m to meet flood level requirements[20], resulting in a level platform generally higher than the surrounding area, with no apparent existing features retained. While I rely of the evidence of Ms Smetham regarding the visual impacts of this, what could result is a relatively characterless context as a starting point for urban development.

66. In my view the opportunity to incorporate aspects such changes in landform, large-scale tree planting, visible landmark buildings and variation in building height to provide a sense of place and character within an urban environment, rather than peripheral to it, become more important as a result.

67. The larger sections around the perimeter, incorporating planting, will provide amenity and soften the built form when viewed from adjacent roads. However, this response will also potentially reduce the level of interaction, physical and visual, between the settlement and surrounds, particularly if buildings are substantially set back. Potentially, this could lessen the sense of place created by the provision of an urban village in this location. This is something of a conundrum which I discuss in more detail in respect to the appropriateness of the methodology applied.

68. A requirement of the RNNZ 8.2.2.8 is meeting a minimum density of 15hh/ha. By having larger sections at the periphery, this potentially reduces the likelihood of substantive variation in lot sizes within the settlement. *"Perimeter lots are anticipated to be in the order of 600-700m^2, with the majority of internal lots around 450-500m^2 and short sections of terraces or other medium density typologies being around 200m2/ unit"*[21].

[20] On-site conversation with the Applicant of 12/03/2026
[21] 1st RFI Response Letter 07/07/2025 pg 5,15. Housing yield

69. As noted previously, I consider the use of a transect (increasing densities towards the centre) could assist with integration and contribute to the village character. The approach could also promote more variation than that suggested in the application, which provides whole of life housing choice and for opportunities such as a large workshop for a home-based business. Again, these are apparent traits of small settlements.

70. The indicative masterplan shows some variation in lot sizes, within a very regular and relatively monotonous suburban pattern of development. However, variation in lot sizes is not translated into the ODP and narrative. There is reference to the location of higher density, but not to variation in density that would support the aspects noted above.

71. The indicative masterplan also signals a superlot of higher density, which in my view is more associated with a suburban or central city approach, rather than a village approach. Simply allocating a superlot for higher density, as you would find in suburban Christchurch, would appear to me less appropriate in a village context such as that proposed. In my opinion, further work is needed that is reflected in the ODP narrative to initiate a range of innovative solutions for variation in residential density, that are suitable to a village character. The use of a transect based approach to increasing densities and variation in building typology and height within the settlement, would be more appropriate in my view.

Accessibility, Integration and Connectivity

72. A key consideration of the NPSUD Policy 1 (c) is accessibility. Similarly, CRPS Policy 6.3.2 references integration and connectivity. All these principles are similar in their intent, albeit can be in reference to a variety of structuring elements within an urban growth area and applied at a range of scales.

73. Mr Compton-Moen[22] considers that the proposed settlement is well-connected to the adjacent area by the existing road network. I agree, except that no road connection is provided to Lower Styx Road, with a

[22] UDA Pg 8

cycle/ pedestrian connection only. I refer to the evidence of Mr Smith[23] in which he considers that a road link to Lower Styx Road should be further investigated.

74. I understand that from the evidence of Mr Smith that public transport is not currently available to the proposed settlement. That is not to say it won't be in the future. However, if not, noting limited density of population within the wider area, the lack of public transport reduces the opportunity to provide an adequate level of accessibility, particularly for those people who are unable to utilise other forms of transport i.e. sight impaired people for example. This results in an inequity in choice and opportunity in locating within this settlement.

75. The ODP identifies two additional cycle/pedestrian connections beyond the settlement. One to Ōuruhia Model School and the other to Prestons North. As with Mr Smith[24], I support their inclusion. However, I also consider further external connections are required to provide direct and safe access to Ōuruhia Model School and to Spencerville, referenced in the ODP.

76. The pedestrian/cycle connection to access Ōuruhia Model School is through a relatively remote and indirect path that links private greenspace and reserves, with limited surveillance. This in my opinion raises safety issues, particularly for children using this route for off-road access to the school. Mr Smith[25] has suggested an alternative off-road shared path along Turners Road (with good connections to it) which I support as a safer, more direct alternative.

77. Spencerville offers several services and community-based opportunities that could be utilised and/or contributed to by residents of the proposed settlement. These include a community hub, playcentre, fire station and home-based businesses, as well as the recreation opportunities in proximity to it, including Spencer Park. Conversely, the proposed

[23] Statement of Primary Evidence of David Smith pg 1 para 5.(c)
[24] Ibid pg 8 para 27.(b)
[25] Ibid

settlement has a neighbourhood centre identified, that may have a complimentary offering to residents of Spencerville.

78. Mr Smith has proposed an additional cycle/pedestrian path to Spencerville[26]. I consider this would be of value to increase access, lessen the isolation of each of these communities, and strengthen community cohesion, should the proposed rezoning proceed.

79. Regarding accessibility within the proposed settlement, I believe further consideration should be given to incorporating several additional cycle/pedestrian links into the ODP and subsequent development should it be approved, to complement a well-connected street network.

80. As noted by Mr Smith, the link route to Ōuruhia Model School, whether used to commute or as a recreational route, does not have a direct link identified between the residential development area and that route. I consider this an omission in the ODP that should be identified to ensure future connectivity.

81. I acknowledge, and as noted by Mr Clease, that PPC23 would be followed by the development of a scheme plan, with the District Plan provisions and RNNZ design guidelines (non-statutory) used as a basis.

82. The (updated) ODP narrative identifies in text the inclusion of mid-block cycle connections. However, just as with road links, identifying important cycle/pedestrian connections on the ODP reinforces their importance in providing a functional and coherent structure.

83. I consider that a further three pedestrian/cycle links should be incorporated in the ODP (*Appendix ii: Proposed ODP Amendments*). The first two indicative links are from the vicinity of the intersection of Turners and Spencerville Roads as noted in the narrative text. These are in combination with a greenspace connection where they intersect with the road reserve to maintain future access, but not provide cycle access to, until adequate facilities are constructed to connect to.

[26] Statement of Primary Evidence of David Smith pg 8 (a)

84. The benefit of the incorporation of these links in the ODP is three-fold. The first is to highlight the importance of future connectivity for pedestrian and cyclists within the settlement, that caters to all abilities/mobility, including to the neighbourhood centre.

85. Second, is to highlight the importance of future connectivity to the wider environment, and the opportunity that this presents. Mr Smith[27] identified that should the immediately surrounding area be urbanised in the future, then frontage upgrades are recommended to avoid development in isolated pockets and reflect an urban development pattern. I agree and consider these connections would ensure a well-connected urban environment more widely should land use change.

86. It is also proposed that, as part of the mitigation of the settlement and integration with the adjacent rural environment, that access be limited to Turners and Spencerville Roads, with boundary fencing, a 10m setback and a 5m landscape strip. This in effect could create a sense of a contained gated suburb rather than a well- integrated urban settlement. I consider that incorporating the greenspace connections/pedestrian cycle links would both provide structuring guides to future development of the settlement and assist with the integration of the settlement with the surrounding area by visually inviting connection to the settlement.

87. The third additional link is to serve as a more direct route to recreational activity. As currently identified the pedestrian/cycle links indicated on the ODP to the north-east follows the ownership boundary rather than following a desire line from the centre of the settlement and creating a more coherent route. A change in this route (*Appendix ii: Proposed ODP Amendments*) could also provide for a direct connection to Spencerville in the future, as also noted in the evidence of Ms Smetham.

Additional Urban Form and Design Principles

88. CRPS Policy 6.3.2 identifies several additional design principles that are equally as important in application to the proposal including Safety

[27] Statement of Primary Evidence of David Smith pg 6, para 20

(CPTED), choice and diversity, environmentally sustainable design and creativity and innovation.

89. I have touched on safety and choice and diversity, as applicable to the ODP and narrative through the course of my evidence in relation to matters such as accessibility and discussion of village character.

90. Also contributing to character, but an aspect of environmentally sustainable design (**ESD**), is the use of low impact urban design. No mention is made of this in the ODP and narrative except in relation to a sustainable stormwater management solution (ODP 3.b) integrated with open space reserves.

91. I consider that both regarding ESD and creativity and innovation, it should be explicit in the ODP narrative that low impact urban design features are to be incorporated across the settlement to contribute to the character and environmental quality of the settlement. This would further integrate the settlement within its natural and rural environment. As discussed in reference to the incorporation of cultural elements, the Ngāi Tahu subdivision and development guidelines provide a comprehensive set of design matters and include ESD. I consider referencing development in accordance with these guidelines in the ODP narrative would ensure appropriate application through the development process.

APPROPRIATENESS OF THE METHODOLOGY APPLIED

92. Irrespective of whether the proposed settlement is appropriate to this location, I have considered the suitability, as requested by the Council, of the methodology applied to integrate the rezoning into the surrounding environment, to deliver a well-connected and attractive urban area.

93. It is noted that there is an overlap in proposals of this nature, between visual impacts in respect to landscape assessment and impacts and as they relate to urban design matters. Where a landscape assessment and may seek visual mitigation of a proposal, from an urban design perspective this may be considered counterproductive to establishing

good urban form and a viable settlement pattern. I discuss this in more detail later in this section.

94. As stated earlier I have adopted the evaluation of Mr Friedel that the SPRZ is an urban environment because of the residential and commercial development capacity already available because of the zoning. I recognise from the evidence of Ms Smetham that there is considerable difference in the visual impacts of the SPRZ and RNNZ as proposed.

Urban Form

95. In addition to the SPRZ, the proposal comprises a further four rural lifestyle lots of approximately 4 hectares each, to the north of the proposal, bounded by Turners and Spencerville Roads zoned RuUFZ. I consider that the incorporation of these blocks within the proposal, despite their current rural zoning, would assist to establish a more coherent urban form, and the opportunity for a more efficient and functional internal street and block pattern should the rezoning be approved. This is large part due to the shape of the block, and the potential level of internal connectivity, potential block orientation amongst other design matters.

Interfaces

96. I consider there is a conundrum with respect to managing an urban/rural interface that raises several questions, irrespective of submissions:

    i. Is it better to mitigate the proposed settlement to reduce the impact for residents of the existing rural environment, which has the potential to visually and physically isolate that settlement? Are there any other knock-on effects?

    ii. Alternatively, should that settlement be incorporated as part of the new character and identity of the area?

    iii. In addition, what happens if the rural area adjacent is rezoned urban in response to future growth pressure?

97. Each of these aspects has been touched on throughout my evidence in the discussion of urban form, tūrangawaewae and accessibility. In my review of village character traits, the settlements across Canterbury analysed were visible with physical interaction i.e. lots and houses fronting onto streets and roads opposite rural areas.

98. The proposal, as identified on the ODP and within the narrative, is to provide by way of a consent notice, a 10m building setback, 5m planting strip and open fencing to the rural boundary adjacent and across Turners and Spencerville Roads. An iteration to the ODP narrative 8.10.3X.C a.2. states *"that these sites shall be of a size that provide for future subdivision with potential vehicle access from these road edges".*

99. It is my understanding that there is limited capacity for urban growth within this area currently due to infrastructure constraints. However, if overcome, and the area is considered appropriate for further urban growth this could change. As noted by Mr Clease[28] the purpose is not to provide a visual barrier but is to lessen the visual impact of suburban style density of residential development on the existing adjacent rural environment.

100. The proposal resulting would provide for larger sections on the periphery of the settlement, with more dense form into the interior of the settlement. In addition, the iteration in the ODP narrative for larger sites would provide future development opportunity to transition from a rural/urban interface to an urban environment in the future. This is not specifically stated in the ODP, but I consider should be for clarity if this approach is progressed. In addition, further subdivision should be in association with changes to the road environment discussed by Mr Smith, contingent on urban development to the west.

101. I consider from an urban design perspective that providing a vegetated setback (not a vegetated barrier), with open fencing, would result in an attractive edge to the settlement, with residential buildings still visible when viewed from adjacent roads and properties to the west and north,

[28] 1st RFI Response 07/07/2025 pg 2

and to some extent, visual interaction with the adjacent road environment, which is positive.

102. However, if large floorplates with minimal space between houses are to be developed, the resultant built form could read as a singular block and quite dense in form, particularly if 8m in height. Based on the indicative scheme, in effect a wall of development could be built along Spencerville and Turners Roads, rather than achieving a village character. Variation in the height of building, and setback distances between buildings could assist in managing this potential impact. I suggest this be incorporated within the ODP narrative. However, I defer to the evidence of Ms Smetham in respect to resolution of this aspect in relation to the rural interface.

103. In my opinion, physical interaction and activity between the settlement and its surrounds would be restricted by the limits to access and potentially continual fencing. In my review of village traits as previously noted, a good level of interaction between the settlements and surrounds were characteristic. My concern is that without further interventions, the proposed settlement will be perceived as an inward facing, 'gated' suburb, rather than contributing to the community more widely.

104. The additional pedestrian/cycle links as I have proposed be incorporated in the ODP if of a sufficient width and landscape quality, could both increase the level of visual and physical connection as well as provide visual breaks within the resultant built form. This would be in association with variation in building height, setback distances between buildings and tree planting within lots and the streets behind these lots. The density will still be in considerable contrast to the adjacent rural environment but in my view will be sufficiently integrated at the interface.

105. As discussed previously, I am concerned about the potential layout and density of development on the upper terrace, if no further open space is incorporated. As per the ODP, reserves and open space - with one exception, a stormwater facility- are located on the lower terrace, below the residential development of the upper terrace.

106. I understand that Mr Barnes, Council's Parks Advisor, in relation to levels of service requested the number of reserves was reduced from five to three, with these now located in the ODP on the lower terrace. As I have referred to previously in respect to village character, locating a reserve on the upper terrace within the residential development in the north-west area of the settlement could provide both visual relief and better integrate the proposal with the surrounding environment. This would also provide space for cluster tree planting and visual relief to housing development, as well as providing a higher level of amenity to residents within the immediate area. As such I have amended the ODP to incorporate a reserve in this area (*Appendix ii: Proposed ODP Amendments*).

107. I defer to the evidence of Ms Smetham in respect to mitigation in respect to landscape values. However, currently I consider that without amendment the methodology will not achieve an appropriate interface with the adjacent environment, nor achieve a village character.

108. These amendments include: variation in building height and internal setback distances; retaining some visibility to the adjacent roads; open style rural fencing; providing additional pedestrian/cycle links and ensuring breaks in built form; provision of open space in the northwest area of the settlement; and incorporation of clusters of large-scale tree planting and street trees, that the proposal will not result in an appropriate interface.

REVIEW OF SUBMISSIONS

109. I have reviewed the submissions in respect to PPC23 as they relate to urban form and urban design matters, extracting the key themes. I have not covered matters where they have been responded to by other subject experts engaged by the Council.

110. Several submissions support PPC23 in respect to aspects such as the opportunities provided by greenfield housing options in proximity to the

city, schooling and recreation activities. They also considered that the new development proposed would improve the quality of life and facilities available. One submitter stated positive urban design and community outcomes, amongst other benefits.

111. A submission in support of PPC23 also requests assurance of safe travel routes and connected street networks that enable access for parents and children to access Ōuruhia Model School efficiently. I consider this appropriate. With the additional pedestrian/cycle links I have proposed for the ODP and the recommendations of Mr Smith, and ensuring the provision of public transport is delivered, I consider that a well-connected road network will be achieved.

112. One submitter was neutral but sought the inclusion low impact urban design measures incorporated within the development proposal. I consider this appropriate to achieving environmentally sustainable design and support this inclusion in the ODP narrative, as discussed in my evidence in respect to the Ngāi Tahu development and subdivision guidelines.

113. Most of the submissions related to urban form and urban design matters are in opposition to PPC23 and seek that the proposed plan change is rejected. Almost all these submissions have not sought relief in relation to urban design or urban form matters.

114. The reasons cited in (loose) reference to urban design include:

- Intensive urbanisation in contrast to the surrounding area.
- Changes in character and amenity as the result of increased density.
- Reduced building setback distances from those of the SPRZ.
- Lack of continuity with existing urban areas.
- No community facilities provided.

- Reduction in greenspace available.
- No design guidance for building.
- Urban design and urban form effects including unconsolidated urban form, lack of walkability.

115. I have addressed all these matters within the body of my evidence where they are within the scope of my expertise.

116. Several submissions sought relief through increased lot sizes ranging from 1000m^2 to 10,000m^2. I do not consider this appropriate to achieving the outcome of a high-quality urban village. In my opinion lots of this size would not be considered urban or suburban and are not effective in supporting a consolidated urban environment or the village character sought by the proposal, including the inclusion of a neighbourhood centre. I defer to Mr Yeoman in respect to the economic implications on the viability of the neighbourhood centre in association with any reduction in lot numbers and sizes.

117. Further, submitters have sought a retention of the 150 households incorporated in the SPRZ**.** I am unsure as to whether this was considered in respect to the layout of the SPRZ ODP, or if the proposition was for a residential cluster. If it is the former, the status quo would apply. I do not consider this appropriate to achieving the outcome of a high-quality urban village.

118. If it is the latter, a well-placed residential cluster on the site would provide a range of potential development outcomes, including the option to stage further development in the future, while retaining adjacent open space and generous setbacks in the interim. The Applicant may wish to advise as to whether they would consider a staged approach to the proposal in respect to developing building clusters of housing over time.

119. I note that while submitters noted the lack of building design guidelines as part of the proposal, in contrast to the SPRZ, no relief was sought by way

of recommendation from these submitters. However, this remains an option for inclusion.

CONCLUSION

120. I have reviewed the urban design assessment and other documents pertinent to urban form and urban design, including where matters relate to those of other discipline experts. I have considered the implications and impacts of PPC23. I have responded to the matters outlined by the Council and considered the submissions to the PPC23.

121. I do not agree with the UDA of Mr Compton Moen in respect to his conclusion that the proposal will not have any adverse effects from an urban design perspective. Overall, I do not consider that as proposed PPC23 will result in the desired urban form and urban design outcomes, for the following reasons:

(a) The proposed settlement is largely isolated by rural land and the Pūharakekenui / Styx River, rather than an extension of an existing urban area, nor is in proximity to it. If developed as proposed, it would be an isolated settlement rather than a suburb in the current planning context.

(b) Accessibility and proximity have been overstated, and rather than creating a well-connected, walkable neighbourhood, the proposal will in effect be an isolated car-dependent dormitory suburb with limited access to day-to-day needs. Accessibility is limited, particularly for public transport and active transport modes, impacting upon choice and in delivering equitable urban places.

(c) The ODP, associated narrative and provisions as proposed will not satisfactorily deliver on the outcomes intended, including a high-quality village environment.

Appendix i: Policy Framework

National Policy Statement on Urban Development 2020

2.1 Objectives

Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.

Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply: the area is in or near a centre zone or other area with many employment opportunities the area is well-serviced by existing or planned public transport there is high demand for housing or for business land in the area, relative to other areas within the urban environment.

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

(a) the area is in or near a centre zone or other area with many employment opportunities

(b) the area is well-serviced by existing or planned public transport

(c) there is high demand for housing or for business land in the area, relative to other areas within the urban environment.

Objective 8: New Zealand's urban environments: support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change.

2.2 Policies

Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:

(a) have or enable a variety of homes that:

(i) meet the needs, in terms of type, price, and location, of different households; and

(ii) enable Māori to express their cultural traditions and norms; and

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

(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and

(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and

(e) support reductions in greenhouse gas emissions; and

(f) are resilient to the likely current and future effects of climate change.

Canterbury Regional Policy Statement 2013

6.3.2 Development form and urban design

Business development, residential development (including rural residential development) and the establishment of public space is to give effect to the principles of good urban design below, and those of the NZ Urban Design Protocol 2005, to the extent appropriate to the context:

1. Tūrangawaewae – the sense of place and belonging – recognition and incorporation of the identity of the place, the context and the core elements that comprise the Through context and site analysis, the following elements should be used to reflect the appropriateness of the development to its location: landmarks and features, historic heritage, the character and quality of the existing built and natural environment, historic and cultural markers and local stories.

2. Integration – recognition of the need for well-integrated places, infrastructure, movement routes and networks, spaces, land uses and the natural and built environment. These elements should be overlaid to provide an appropriate form and pattern of use and development.

3. Connectivity – the provision of efficient and safe high quality, barrier free, multimodal connections within a development, to surrounding areas, and to local facilities and services, with emphasis at a local level placed on walking, cycling and public transport as more sustainable forms of

4. Safety – recognition and incorporation of Crime Prevention Through Environmental Design (CPTED) principles in the layout and design of developments, networks and spaces to ensure safe, comfortable and attractive places.

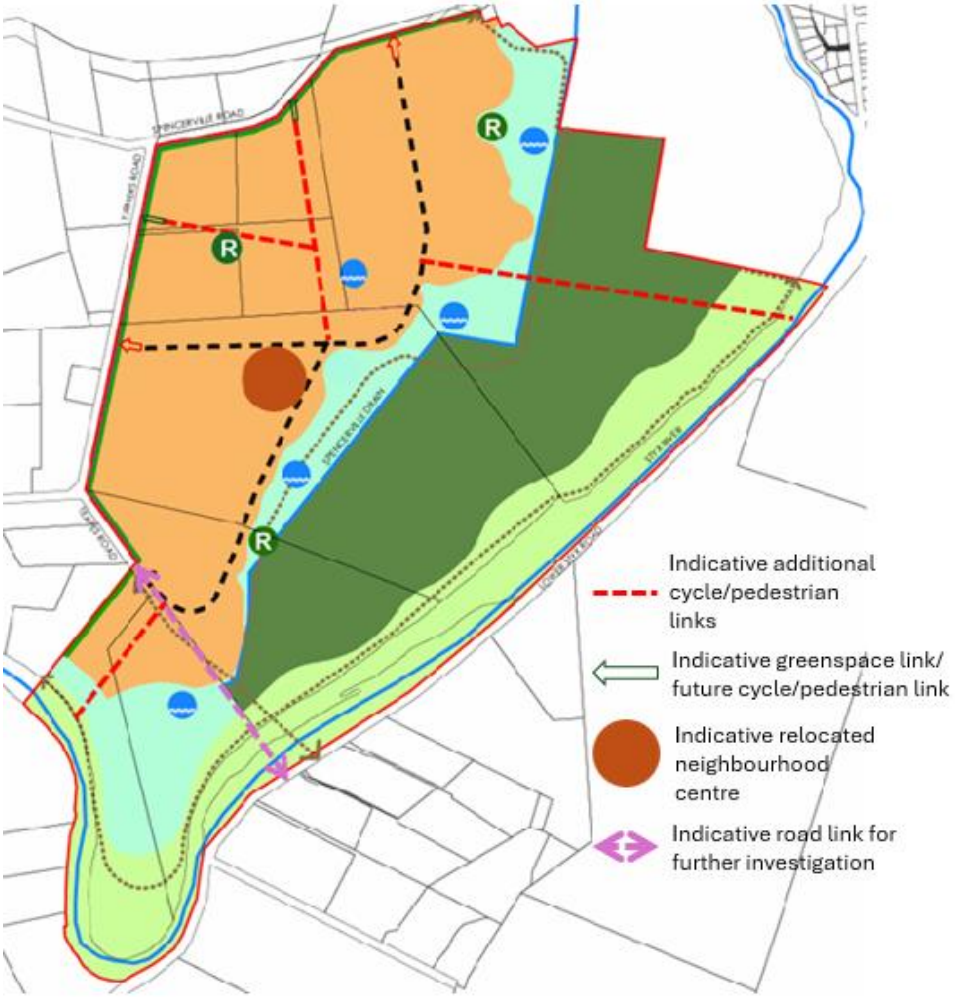
5. Choice and diversity – ensuring developments provide choice and diversity in their layout, built form, land use housing type and density, to adapt to the changing needs and circumstances of the population.

6. Environmentally sustainable design – ensuring that the process of design and development minimises water and resource use, restores ecosystems, safeguards mauri and maximises passive solar gain.

7. Creativity and innovation – supporting opportunities for exemplar approaches to infrastructure and urban form to lift the benchmark in the development of new urban areas in the Christchurch region.

8. This policy implements the following objectives: Objectives 6.2.1, 6.2.1a, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6

Appendix ii: Proposed ODP Amendments



APPENDIX 6 – REVIEW OF PPC23 AND SUBMISSIONS RELATED TO ECONOMIC MATTERS BY RODNEY YEOMAN, DIRECTOR AT FORMATIVE ECONOMICS LIMITED

BEFORE INDEPENDENT HEARING COMMISSIONERS
IN CHRISTCHURCH

TE MAHERE Ā-ROHE I TŪTOHUA MŌ TE TĀONE O ŌTAUTAHI

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the hearing of submissions on Private Plan Change 23 Whisper Creek, Spencerville to the Christchurch District Plan

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STATEMENT OF PRIMARY EVIDENCE OF RODNEY GEORGE YEOMAN ON BEHALF OF CHRISTCHURCH CITY COUNCIL (ECONOMICS)

Dated: 14 April 2026

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EXECUTIVE SUMMARY

1. In this statement, I have reviewed the economic evidence provided by the applicant and submissions raising economic issues in relation to Plan Change 23 Whisper Creek. Broadly, I consider that the economic benefits associated with the proposal may be net positive, and as such I support the rezoning.

2. However, I do not consider that the Economic Assessment provided by the applicant provides a robust quantification of the benefits, and there is limited discussion of the costs which are assumed to be immaterial.

3. I consider that this one-sided approach is unusual, and that no use of a resource can be truly costless, whether that be land or any other resource. Land use is never costless in economic terms because it always involves opportunity cost and often creates externality effects. The applicant's economist should have provided a more balanced assessment to enable decision-makers to understand the full range of economic implications associated with the proposed development.

4. My review has the following core findings:

   (a) I agree, based on information provided by the applicant, that the existing Golf course alternative is not commercially viable, which means that this alternative can be ignored as a viable option. However, in my opinion, the baseline counterfactual should be that the land remains in rural production, and that dwellings are accommodated elsewhere in the Urban Environment.

   (b) In relation to demand and supply in the residential market and the NPS-UD Policy 2, there is already sufficient capacity provided within the planning framework to meet expected demand. However, the sufficiency requirement in Policy 2 is framed as a minimum threshold ("at least"), such that the provision of extra capacity is not precluded if the merits of a proposed development meets the other aspects of the NPS-UD.

   (c) In relation to unanticipated development proposed in PPC23 and the NPS-UD Policy 8, it is arguable whether the development is within the definition of 'Urban Environment', however I agree that PPC23 is likely

to be ‘significant’ and it may ‘contribute to well-functioning urban environment’.

(d) In terms of economic benefits, the development would provide some additional competition in the housing market and housing choice, albeit relatively small within the context of the Urban Environment. The implications for affordability will be minimal, as the proposed development will provide lots and dwellings of above average size, which will mean that sales values will be above the average in the Urban Environment. Moreover, only a portion of the one-off construction benefits estimated in terms of GDP and employment should be considered as net additional to the economy. If this development does not occur, then demand would be satisfied elsewhere and hence most of the GDP and employment is not new to the economy and should not be viewed as economic benefits.

(e) In terms of costs, I consider that these have not been quantified or addressed in the Economic Assessment. In my opinion, there will likely be costs, such as loss of rural production, infrastructure costs, potentially a reduction in the uptake of intensification, and other externalities (environmental, social, etc.).

(f) The proposed provision of commercial land within PPC23 is relatively large compared to the amount of convenience based demand that can be expected. Hence the viability of this aspect of the development is questionable. While I agree that the potential retail distribution effects on other centres will be minimal, the provision of too much land precludes other uses and hence would be inefficient from an economic perspective.

5. Furthermore, my review of the economic issues raised in the submissions does not change my position, and I still consider that the economic outcome from PPC23 may be positive. However, I agree with submitters that the Economic Assessment is neither complete, nor compelling.

6. In conclusion, while I do not agree with the quantification in the Economic Assessment, and consider that it overstates the potential economic benefits and ignores the likely costs. I do however agree that PPC23 may result in positive economic outcomes relative to the counterfactual.

2. INTRODUCTION

7. My full name is Rodney George Yeoman. I am a Director of Formative, an independent consultancy, specialising in social, economic and urban form issues. Prior to this, I was an Associate Director of Market Economics Limited, an independent research consultancy, for 12 years.

8. I have prepared this statement of evidence on behalf of the Christchurch City Council (the **Council**) in respect of economic matters arising from the submissions and further submissions on Private Plan Change 23 Whisper Creek, Spencerville to the Christchurch District Plan (the **District Plan**; **PPC23**).

9. I am authorised to make this statement on behalf of the Council. I understand that this statement will be attached to the officer's report under section 42 (**s42 report**) of the RMA, that is being prepared by Mr Craig Friedel.

Qualifications and experience

10. I hold the degrees of Bachelor of Commerce and Bachelor of Laws from the University of Auckland. I also hold Postgraduate Honours in Economics from the Australian National University.

11. I have over 20 years consulting and project experience, working for commercial and public sector clients. I specialise in policy assessment, industry and markets research, the form and function of urban economies, the preparation of forecasts, and evaluation of outcomes and effects.

12. I have applied these specialties in studies throughout New Zealand, and in Australia, across most sectors of the economy, notably assessments of district plan policies and rules, urban form, land demand, housing, and other local government issues.

13. I have extensive experience undertaking assessments under the Resource Management Act **(RMA**), National Policy Statement on Urban Development (**NPS-UD**), National Policy Statement for Highly Productive Land (**NPS-HPL**), and various other resource management legislation.

14. I have local experience in Christchurch providing research for Christchurch City Council, Selwyn District Council, Waimakariri District Council, Greater

Christchurch Partnership, Environment Canterbury, and developers for more than ten years.

15. Relevantly, my research is applied in the 2023 Housing Capacity Assessment[1] (**HCA**) and I provided economic evidence in the Greater Christchurch Spatial plan hearing[2]. I have also provided research and evidence in this local area for District Plan Reviews[3], Intensification Planning Instruments[4], Private Plan Changes, Fast track applications, and Environment Court appeals.

16. I am a member of New Zealand Association of Economist, Population Association of New Zealand, and New Zealand Association for Impact Assessment.

Code of conduct

17. While this is a Council hearing, I have read the Code of Conduct for Expert Witnesses (contained in the 2023 Practice Note) and agree to comply with it. Except where I state I rely on the evidence of another person, I confirm that the issues addressed in this statement of evidence are within my area of expertise, and I have not omitted to consider material facts known to me that might alter or detract from my expressed opinions.

Scope of evidence

18. I have been commissioned by Council to provide evidence to this Hearing regarding the economic effects associated with proposed PPC23.

19. In preparing my evidence I have reviewed the following documents:

    (a) "Request for Change to the Christchurch District Plan to rezone land generally located at 240 Spencerville Road, Marshlands from a Specific Purpose (Golf Resort) Zone and Rural Urban Frige Zone to a Residential New Neighbourhood Zone" May 2025, Planz (**s32 report**).

    (b) "Economic Assessment of Proposed Rezoning at Whisper Creek" 1 May 2025, Insight Economics attached to the s32 report as Appendix A (**Economic Assessment**).

[1] Greater Christchurch Partnership (2023) Greater Christchurch Housing Development Capacity Assessment.
[2] Greater Christchurch Partnership (2024) Greater Christchurch Spatial Plan.
[3] Selwyn and Waimakariri.
[4] Selwyn, Waimakariri, and Christchurch.

(c) "Response to RFI for Whisper Creek Private Plan Change 23" 25 July 2025, Insight Economics (**RFI Economic response**).

(d) Associated plan change maps and other relevant technical reports from the applicant.

(e) Reports from Council on Plan Change 14 and other planning documents.[5]

20. The following submissions:

(a) Spencerville-Residents-Association (14), Ouruhia-Residents-Group (70), and a number of individuals (e.g. 19, 23, 63) that use the same proforma submission that oppose the development for the same reasons. These will be referred to as Spencerville-Ouruhia Residents (**SOR submissions**).

(b) Environment Canterbury (69) which is neutral, but raises urban form and infrastructure issues which have economic implications (**ECan submission**).

(c) A number of submissions from others in the community (22, 30, 32, 34, 54, 65 71, and 75), who oppose PPC23.

(d) Supporting submission from the local businesses (8 and 59).

(e) Submission from the owners of the land directly covered by PPC23 (5, 7, 52, and 58. I understand that one landowner (64) has been withdrawn their submission, so their relief cannot be considered.

21. My evidence is structured as follows:

(a) Section 3 provides a summary of the applicants Economic Assessment.

(b) Section 4 provides an independent assessment of the economic issues.

(c) Section 5 provides a review of the submissions that raise economic issues.

[5] Christchurch City Council (2025) Assessment of demand, plan enabled and feasible plan enabled housing capacity for the partial withdrawal of PC14.
Christchurch City Council (2026) Population and Household Projections.
Greater Christchurch Partnership (2024) Greater Christchurch Spatial Plan.
Greater Christchurch Partnership (2023) Greater Christchurch Housing Development Capacity Assessment.
Environment Canterbury Regional Council (2013) Canterbury Regional Policy Statement (operative).

(d) Section 6 concludes my statement.

22. I address each of these points in my evidence below.

3. SUMMARY OF PPC23 ECONOMIC ASSESSMENT

23. First the Economic Assessment outlines the aspects of the subject site, being approximately 170ha and currently in use as a dairy farm and four 4 ha lifestyle blocks.[6]

24. The current zoning of most the land (Specific Purpose (Golf Resort)) would allow the development of a full golf course, visitor accommodation (540 bedrooms), commercial (1,500m^2), and 150 dwellings.[7]

25. The PPC23 proposed zoning would enable 800 dwellings on 64ha and 1.46ha of commercial of land, with the remainder of the land near Pūharakekenui (Styx River) being open space.[8] The economic assessment states that the proposal would achieve a density of "12.5 dwellings per hectare" on the developable land, which is less than the target of 15 dwellings per hectare for Christchurch.[9]

26. The Economic Assessment provides a discussion of the commercial viability of a golf resort development on the site, and concludes that it is "purely theoretical as no demand for such uses has materialised over the past 15 years"[10] and the forgone value is "negligible"[11].

27. The Economic Assessment provides summary information about the housing market in Christchurch City (section 5). The assessment concludes that population growth in Christchurch has outpaced the old population projections,[12] and that the number of dwellings consented has been higher than the projections in the 2023 HCA,[13] and that attached dwellings have become increasingly popular and account for the majority of new houses built in Christchurch.

28. The Economic Assessment briefly outlines an argument around latent demand for standalone dwellings, and Pokeno (Auckland) is provided as a case study to support this proposition.[14] The assessment provides census

[6] Economic Assessment, p3 para 1.
[7] Ibid, Page 6 bullet points 1 to 4.
[8] Ibid, Figure 3 Indicative Masterplan.
[9] Ibid, p24 para 5.
[10] Ibid, p8 bullet point 1.
[11] Ibid, p8 para 4.
[12] Ibid, sub-section 5.1.
[13] Ibid, sub-section 5.2 and 5.3.
[14] Ibid, sub-section 5.4.

data for the local area around PPC23, and concludes that the area is different to the rest of Christchurch.[15] Finally, the Economic Assessment provides dwelling sales price and rents for the City, concludes that housing is becoming less affordable.

29. In relation to NPS-UD, the Economic Assessment considers that the proposed development:

    (a) is significant with respect to Objective 6.[16]

    (b) will increase competition in land market with respect to Objective 2.[17]

    (c) will contribute to a well-functioning Urban Environment with respect to Objective 1.[18] Through the economies of scale of this large development, optimise infrastructure investment, providing jobs during the construction, and a range of urban form benefits from PPC23 master-planned development.

    (d) provide a range of dwelling options and improve choice to meet a wide range of needs, as per Policy 1.

30. The Economic Assessment also provides a qualitative discussion of the potential implications of the commercial hub that is proposed.[19] This assessment establishes the potential centres near the site that could be at risk of retail distribution effects and the total retail demand from the households that may live in development. Qualitatively, it is concluded that the proposed centre is small relative to the other centres, impacts will be dispersed over a number of centres, and much of the spend from the households will flow out to the other centres anyway. As such there is no material risk of an impact on existing centres. It is also worth noting that the RFI Economic Response provides an assessment of the scale of a normal convenience focused centre to serve the needs of the residents in PPC23. It notes that it would be 0.24ha of land and 1,250m^2 of Gross Floorspace Area (**GFA**), and suggests 3,000m^2 GFA would be appropriate upper limit.[20]

31. The Economic Assessment quantifies some of the wider economic benefits including one-off construction benefits of $258m in GDP and 1,865 jobs[21],

[15] Ibid, sub-section 5.5.
[16] Ibid, sub-section 6.1.
[17] Ibid, sub-section 6.2.
[18] Ibid, sub-section 6.3.
[19] Ibid, section 7.
[20] PPC23 1st RFI Response Economics 29.07.2025, p3.
[21] Economic Assessment, sub-section 8.1.

ongoing activity in the new commercial space (a small café and one or two takeaway, and a preschool) with 10 jobs[22], and travel time/costs savings of $0.5 to $1m per annum[23]. Other wider economic benefits are briefly discussed qualitatively.

32. Finally, the Economic Assessment concludes that PPC23 development is supported on economic grounds.

4. ECONOMIC ISSUES

33. Based on my review of the Economic Assessment, and my experience with RMA assessments, I consider that the core economic issues are as follows

(a) What is the counterfactual to which the proposed PPC23 development should be compared?

(b) What is the residential demand and supply situation in the market in which PPC23 will be developed?

(c) How does the proposed PPC23 sit within the national (NPS-UD), regional (CRPS), and district planning frameworks?

(d) What are the economic benefits of the proposed PPC23 development, and how should they be quantified?

(e) What are the economic costs of the proposed PPC23 development, and how should they be quantified?

(f) Does the economic benefits outweigh the economic costs, hence the overall merits from an economic perspective?

34. I cover each of these questions to provide an independent review of the proposed development of PPC23.

What is the counterfactual to which the proposed PPC23 development should be compared?

35. A core issue in any economic assessment is definition of the baseline situation from which the proposal should be assessed. Importantly, this baseline ensures that the economic assessment measures the net benefits,

[22] Ibid, sub-section 8.2.
[23] Ibid, sub-section 8.4.

rather than the gross benefits. It also ensures that the opportunity costs associated with the proposal are considered.

36. In this situation, the Economic Assessment does not apply a consistent baseline counterfactual throughout the report. For most of the assessment, it is assumed that the baseline scenario is that the golf course is not developed and the land remains in its current state.[24] The proposed development is assumed to generate new dwellings, which would not otherwise have been built elsewhere in the Urban Environment and are treated as being net additional.

37. However, when assessing transport effects, the Economic Assessment shifts its counterfactual and assumes that these households would in fact have lived elsewhere in the Urban Environment and would therefore have generated higher transport costs if the development does not proceed as proposed in PPC23.[25]

38. Similarly, while the Economic Assessment notes that most of the site is currently used for rural production[26] at no point does the Economic Assessment consider this lost activity or whether this is a cost. Implicitly this opportunity cost of the land is ignored and assumed to be zero.

39. I consider that the Economic Assessment has not adequately set out the situation to ensure that the correct counterfactual is used. Nor has it consistently applied the counterfactual in the assessment.

40. In my opinion, I agree that the development of the golf course is not viable and that it does not represent the correct counterfactual to be adopted. The counterfactual should be that rural production on this site continues, and that development occurs elsewhere in the Urban Environment, some in Christchurch and some in other areas like Kaiapoi or Rangiora.

41. If the correct counterfactual had been applied in the Economic Assessment then:

    (a) **Rural Production**: there would be a loss of rural activity, which should have been easily quantified by the applicant's economist.

    (b) **Net Construction**: much of the construction benefits noted in the Economic Assessment would have occurred regardless of PPC23, with

[24] Ibid, sub-section 4.3.
[25] Ibid, sub-section 8.4.
[26] Ibid, sub-section 3.1.

development merely being a transfer from other areas in the Urban Environment.

(c) **Transport Benefits**: would potentially be lower, as it is likely that not all the development would have occurred in Rangiora or Rolleston, as assumed in the Economic Assessment.

42. In summary, had the Economic Assessment of PPC23 applied the correct counterfactual, the resulting analysis would have shown materially lower benefits and identifiable costs, which means that the current assessment overstates net gains associated with PPC23.

What is the residential demand and supply situation in the market in which PPC23 will be developed?

43. The Economic Assessment relied on the 2023 HCA and recent building consent data to suggest that demand may be higher in Christchurch City than previously projected.[27] However, the Economic Assessment does not present data on capacity or establish whether there is a need for more development capacity in the district. Nor did the assessment provide an understanding of the quantum of demand for PPC23, or even greenfield demand in the District.

44. First, I agree that demand is likely to be higher than presented in the old projections used in the 2023 HCA. I note that newer projections were released in late 2025[28], and Council is now applying growth projections that are higher. Their latest projections suggest a medium term (2025-2035) demand of 17,500 dwellings (including competitiveness margin), and for the long term period (2025-2053) 37,100 dwellings.[29] This is 46% higher than the medium-term demand shown in the 2023 HCA, which is relied on within the Economic Assessment.

45. I also note that since the Economic Assessment was produced for PPC23 that the amount of capacity provided for in the District has increased significantly. The Council was required by legislation[30] to provide capacity for more development potential to withdraw PC14. The adopted change to the District Plan provided plan enabled capacity of 458,262 dwellings, of which 68,200-78,400 was estimated to be commercially feasible under

[27] Ibid, sub-section 5.1-5.3.
[28] Statistics New Zealand (2025) Sub-national projections (25 Sept).
[29] Christchurch City Council (2025) Subnational Population Projections analysis LTP 2027.
[30] Schedule 3C of the Resource Management Act.

current conditions.[31] Moreover, I note that there is likely to be considerable additional supply that becomes feasible over the long term as existing housing stock depreciates and market conditions and relationships evolve, which results in more development being feasible.

46. Therefore, the new demand projections for housing (37,100 in 2025-2053) are still significantly lower than the capacity provided for in the current District Plan (over 68,200). I consider that in terms of meeting the sufficiency test in the NPS-UD, the Council has more than achieved this requirement.

47. However, it is important to emphasise that I agree with the s32 report which notes that, "*regardless of whether or not adequate capacity is being provided, the NPS-UD does not preclude the provision of further capacity i.e. it is a tool for* ensuring *minimum capacity requirements are met, rather than being a tool for limiting additional capacity (provided such additional capacity is in locations that meet the other NPS-UD policy tests). In short, there is no policy direction within the NPS-UD that prevents or discourages the provision of more than adequate capacity, provided such additional growth areas are appropriately located and serviced. The NPS-UD assessment is therefore focussed on whether or not the plan change delivers a 'well-functioning urban environment'.*" page 34

48. I agree that the PPC23 development can still be considered in terms of its merits, and that the rezoning of the site is not precluded by the fact that the recent changes in the District Plan have provided a large supply of capacity, which exceeds the likely level of demand.

49. Furthermore, I note that the 2025 capacity assessment shows remaining capacity of 7,600 dwellings in greenfield areas of Christchurch. While I agree with the Economic Assessment, which notes that "the majority of consents for the past four years running"[32] were for attached housing, I consider that the minority of demand for standalone dwellings could have been assessed to establish the likely demand for greenfield locations, and hence PPC23.

50. In the absence of an assessment in the Economic Assessment, I provide the following indicative assessment based on building consents. I note that

[31] Christchurch City Council (2025) Assessment of demand, plan enabled and feasible plan enabled housing capacity for the partial withdrawal of PC14.
[32] Economic Assessment, p11 para 1.

over the last five years an average of 1,600 standalone houses were consented per annum. If half of these were in greenfield areas, then this would indicate a demand for 800 dwellings per annum.[33] This would mean that the supply of greenfield capacity could run out within the medium term, i.e. capacity of 7,600 might provide 9.5 years of supply if demand is 800 per annum.

51. While the above is an indicative assessment, potentially there could be a need for more supply in greenfield areas in the coming decade (around 2035). However, the Economic Assessment provides no evidence on this aspect, and I am unable to establish from the material whether this is the case or not.

How does the proposed PPC23 sit within the national (NPS-UD and NPS-HPL), regional (CRPS), and district planning frameworks?

52. The NPS-UD Policy 8 requires councils to be responsive to plan changes that add significant development capacity that contributes to well-functioning urban environments, even if they are unanticipated or out-of-sequence. The Economic Assessment concludes that PPC23 is significant and would contribute to the urban environment. The Economic Assessment provides no review or guidance on whether PPC23 is part of the Urban Environment.

53. I consider that for Policy 8 to apply the Site must affect an Urban Environment, and provide significant capacity, and contribute to a well-functioning urban environment.

54. First, although the Economic Assessment did not address this issue, I have considered whether the site falls within the Urban Environment. The NPS-UD does not mention Special Purpose Zones (SPZ) in relation to housing, nor does it provide a definition of what constitutes “housing land”.

55. I note that clause 3.37 Monitoring does mention some residential zones, but there is no mention of SPZ. The NPS-UD does mention SPZ in relation to business land (Interpretation 1.4(1)), “to the extent it allows business uses”. This relates to the fact that most SPZ are defined for unique/large-scale commercial or government activities which have business activities (i.e.

[33] Statistics New Zealand (2025) New Dwelling Building Consents (year end December).

Airport, Port, Corrections, Military, Hospital, Stadium, University, Tourism Activity, Māori purpose, etc).

56. In my opinion the omission of any reference in the NPS-UD to considering a residential role of SPZ when a business role is specifically referred to, means that there is no definitive direction in the NPS-UD that SPZ should be included in the assessment of housing land within the Urban Environment. A plain reading of the NPS-UD would suggest that there is no such requirement and I note that I have reviewed Housing Capacity Assessments for all of the Tier 1 councils, and some Tier 2 councils, across New Zealand. None of those assessments include SPZ within the modelled housing capacity (including Christchurch, Selwyn, Waimakariri, Queenstown, Dunedin, Auckland, Hamilton, Waipā, Waikato, Wellington, and Kaipara).

57. I note that the definition of Urban Environment is set out in Interpretation 1.4(1) of the NPS-UD, requires that land be predominantly urban in character and within a housing and labour market of at least 10,000 people.

    (a) I consider that SPZ (Golf Resort) is intended to be predominantly used for recreational tourism activity (golf course and open space) with resort facilities and low levels of ancillary accommodation in a rural setting (150 dwellings). Furthermore, the site is currently undeveloped and used for rural farming, with surrounding areas not being zoned for urban activity. Intentionally, the site is an island of activity away from the urban area. Therefore, in my opinion it is debatable whether or not this site is predominately urban, which is also covered in detail by the planning and urban design evidence. I note that s42 report finds that golf course SPRZ is urban in character[34] and the urban design evidence also considers that the potential residential and commercial enabled within SPRZ suggests urban character.[35]

    (b) However, I consider that the SPZ (Golf Resort) site is likely to be within a housing and labour market of at least 10,000 people because of its proximity to Christchurch, and I would expect that most of the staff at the resort would live in the Christchurch Urban Environment. Hence this location is likely to be within a labour market of more than 10,000 people.

[34] S42 Report paragraph [5.3.7]
[35] JFJ Schroder – Urban Design Evidence – PPC23, paragraph [94].

58. Therefore, in my opinion it would be debateable whether the SPZ (Golf Resort) is within the Urban Environment because it may not pass both of the conjunctive requirements in the NPS-UD. In my opinion the SPZ (Golf Resort) is, by design, predominantly intended to be a tourism activity in a rural setting, rather than an urban setting.

59. Furthermore, not all special purpose zones are urban. Within Christchurch examples of SPZ that may not be urban are Special Purpose Zone (Styx Mill Road Transfer Station), Special Purpose Zone (Ruapuna Motorsport), Special Purpose Zone (Airport), and Special Purpose Zone (Clearwater Golf Resort). Also as example, just north of the site in Waimakariri district, Special Purpose Zone Pegasus Resort, while in Selwyn district there are a number of special purpose zones (Ski fields, Rolleston Prison, Lincoln University, Dairy Processing, Burnham Military camp etc).

60. Finally, I acknowledge the planning assessment in the section 42A report and the urban design evidence from Mr Schroder, both of which conclude that the Special Purpose Zone is predominantly urban in character. I defer to that evidence and accept that this part of the development forms part of the urban environment.

61. The second criteria in the NPS-UD Policy 8 is whether the development would add significant capacity. I agree with the Economic Assessment and s32 Report that the development would add significant capacity, because of the number of dwellings being proposed in PPC23 is relatively large within the context of the residential market in the District. However, I disagree with the method adopted in the Economic Assessment and consider the finding that a development of 15-30 lots is significant to be unreasonable.[36]

62. The third criteria in the NPS-UD Policy 8 is whether the development would contribute to a well-functioning urban environment. While I disagree with the Economic Assessment on the quantum of the benefits and the extent to which PPC23 would contribute to well-functioning Urban Environment, I consider that it is likely that it may positively add to the Urban Environment, due to its proximity to urban Christchurch and hence consider that the proposed development is consistent with Policy 8. I cover the quantification of benefits and costs in the next parts of my evidence, and do not repeat these findings.

[36] Economic Assessment, p15.

63. In summary, if this land is within the Urban Environment, I consider that PPC23 would likely satisfy the other criteria of Policy 8, at least from an economic perspective. I acknowledge, however, that other factors such as transport, infrastructure, and so on, must also be taken into account.

64. I acknowledge that the NPS-HPL defines "urban" as "any special purpose zone, other than a Māori Purpose zone" and "urban rezoning" as the change of land from a general rural or rural production zone to an urban zone. I also understand that most of the PPC23 area is on highly productive soils, being Land Use Capability 2 (**LUC2**). However, due to definitions in the NPS-HPL, it is my understanding that the NPS-HPL may not apply to the SPRZ land in the application because the PPC23 area is not zoned rural or rural production. However, a small part of the RUUFZ land is LUC2 and the NPS-HPL may apply, however in my opinion this piece of land is very small and would not be viable to farm. Whether the definition of "urban" in the NPS-HPL is relevant to, or can inform, the interpretation of "Urban Environment" for the purposes of the NPS-UD is a legal issue.

65. I also note that the Site is not shown as being "urban" within the Map 1 of the Spatial Plan[37], the NPS-UD assessments conducted by Christchurch City Council do not include this area as being urban[38], and Map A of the Canterbury Regional Policy Statement **(CRPS**) also does not show the site as being "existing urban area"[39].

66. I disagree with the premise suggested in the s32 report, that the large amount of rural land within the (unnamed) dotted lines in Map A of the CPRS represents the Urban Environment for the purposes of the NPS-UD. That line was developed well before the introduction of the NPS-UD, and cannot therefore have been defined to be the same as the 'urban environment' defined under the NPS-UD.[40] Furthermore, I disagree with the s32 report, and consider that the question of what constitutes the Urban Environment in Greater Christchurch is a live issue, and is still under debate in the recent district plan hearings and Environment Court appeals.

67. Most recently the commissioners on Waimakariri District Plan Review found:

[37] Greater Christchurch Partnership (2024) Greater Christchurch Spatial Plan, p 12.
[38] Greater Christchurch Partnership (2023) Greater Christchurch Housing Development Capacity Assessment.
[39] Environment Canterbury Regional Council (2013) Canterbury Regional Policy Statement (operative), p92.
[40] s32 report, p34 "Greater Christchurch, as outlined in Map A of the CRPS, is an "urban environment"".

"*We conclude that the entire Greater Christchurch Area (GCA) within Waimakariri is not intended to be an 'urban environment'. The shaded areas on Map A, shown as Existing Urban Areas, Future Development Areas and Greenfield Priority Areas, along with any other land that may be within the 'projected infrastructure boundary' will fall within the 'urban environment' of the GCA. This does not stop other areas becoming part of the urban environment 'it if is intended' under the responsive planning provisions, as the GCA meets the second part of the NPS-UD definition of 'urban environment'.*"[41] And "*It is 'drawing a long bow' to suggest the entire area is, or is intended to be, the urban environment for the purposes of NPS-UD, particularly when the NPS-HPL is factored into that assessment.*"[42]

68. While I agree that PPC23 would be urban if it was developed as proposed, and that the urban fringe has been extending towards the area over the last 15 years, I consider that it is arguable whether the site is part of the Urban Environment, including for the reasons given in this recent decision in Waimakariri:

"We do not necessarily agree that any new growth areas need to be adjacent to one of the three existing residential areas within the District; however, we find that when a new growth area is proposed, it does need to demonstrate that it gives effect to the objectives and policies in both the NPS-UD and the RPS, with the RPS policies still needing to be considered."[43]

69. Therefore, I consider that while the land in question may not be part of the Urban Environment, this does not preclude an assessment of the proposal on its merits.

What are the economic benefits of the proposed PPC23 development, and how should they be quantified?

70. The Economic Assessment identifies a range of economic benefits, including one-off construction activity, ongoing employment in the commercial area, transport savings, increased competition, infrastructure optimisation, and economies of scale. The first three benefits are quantified, while the remaining benefits are discussed qualitatively.

[41] Recommendations of the PDP Hearings Panel Report 1 2025, p40 para 90.
[42] Recommendations of the PDP Hearings Panel Report 3 2025, p18 para 54.
[43] Recommendations of the PDP Hearings Panel Report 35 2025, p4 para 20.

71. In terms of the first three, I consider that the values presented by Economic Assessment do not adequately account for the baseline counterfactual. This means that the values estimated in the Economic Assessment should be viewed with caution, for the following reasons:

(a) Most of the construction value quantified in the Economic Assessment would occur regardless of whether the development proposed to be enabled by PPC23 occurs or not. While that development would provide local benefits to nearby businesses, within the Urban Environment the vast majority of this activity would take place elsewhere anyway if PPC23 did not occur. This transfer effect is a well-recognised limitation of the modelling approach used in the Economic Assessment. As a result, the economic benefit from the development is likely to be considerably smaller than the $26m GDP and 186 jobs per annum reported.[44] The Economic Assessment implicitly assumes that households who would reside in the PPC23 area would otherwise live in a different city, whereas the more likely outcome is that most PPC23 households would rather find an alternative location within the Christchurch Urban Environment, which then would generate a similar level of economic activity elsewhere within Christchurch. Therefore, the net benefits from construction associated with PPC23 will only be the difference between building houses in PPC23 versus the construction occurring in an alternative part of the Urban Environment, which will be marginally different at best and only a small share of the reported GDP and jobs.

(b) The same issue applies to ongoing employment in the commercial area. Broadly, I accept the Economic Assessment's estimate that businesses in the area may feasibly employ around 10 people if the commercial centre has a convenience role for the local residents.[45] However, these jobs would be supported by households whose demand would exist regardless of where they live within the Urban Environment. Consequently, this on-going activity represents a transfer effect, as the activity would occur under both the counterfactual and the development of PPC23, meaning the net economic benefit is likely to be marginal at best.

[44] Economic Assessment, subsection 8.1.
[45] Ibid, subsection 8.2.

(c) The calculation of transport savings in the Economic Assessment acknowledges that the households that may live in PPC23 will in fact still live within the Urban Environment (Rangiora or Rolleston). However, I consider that the assumption that 100% of households would live in Rangiora or Rolleston is not realistic or relevant. This outcome would represent a very unlikely situation, and in my opinion if PPC23 was not developed then demand would be accommodated across a range of locations, including other parts of Christchurch and other areas in Selwyn and Waimakariri that are closer (i.e. Kaiapoi, Prebbleton). Hence the travel time and fuel cost savings estimates presented in the Economic Assessment will overstate the benefits, and the true value would be well below the range shown in the Economic Assessment ($0.5 to $1m).[46] I would expect that if a reasonable distribution of alternative locations was applied then the benefits would be materially smaller.

72. As outlined above, I consider that the quantified benefits from PPC23 are materially smaller than presented in the Economic Assessment. I consider that the assessment presented does not adequately estimate the benefits and that while there are likely to be some economic benefits, the magnitude of those benefits estimated in the report are overstated significantly.

73. In terms of the other benefits that were not quantified, I consider these will be relatively small.

(a) **Competition**: the potential impact of the development on competition is likely to be small, given that the proposal would deliver approximately 80 dwellings per year. This represents less than 0.8% of annual house sales and around 2% of new dwelling construction in Christchurch. In my view, a supply increase of this scale would not be sufficient to structurally alter competitive conditions in the housing market. Furthermore, it is likely that, in the absence of approval for PPC23, a substantial proportion of these dwellings would be delivered in alternative locations, with broadly similar implications for competition. On that basis, I consider that the proposal would result in minimal net additional positive effects on competition at a city-wide scale, although I accept that there may be a marginal benefit. Finally, I consider that the Economic Assessment's reference to "market power" is

[46] Ibid, subsection 8.4.

unsubstantiated and this discussion is unhelpful as it exaggerates the potential benefit in this context.[47]

(b) **Optimise infrastructure**: there can be circumstances in which spare capacity exists within infrastructure networks because other planned development has proceeded more slowly than anticipated, or where infrastructure has already been provided such that additional development can occur at relatively low marginal cost. There can also be cases when master planned and strategically located developments can be more efficient than unplanned development, and I accept that such situations and outcomes can arise. However, the generic statements in the Economic Assessment provide no evidence that this is the case for PPC23.[48] It therefore remains to be demonstrated whether development under PPC23 would in fact 'optimise' the use of infrastructure or instead use infrastructure in a way that will instead cause additional infrastructure to be required more quickly than it would otherwise be. In this respect, I consider that the detailed infrastructure evidence should be preferred, and that the largely theoretical assertions in the Economic Assessment are of limited value to the assessment of PPC23.

(c) **Catering to a Variety of Housing Needs**: the Economic Assessment notes that PPC23 will provide a range of lots, and some spanning 1,000m^2 to 2,000m^2 which will enable a variety of housing to be built.[49] The Economic Assessment provides no data on the proposed lot size distribution in PPC23, and the Indicative Masterplan likewise contains no such information.[50] The economic assessment simply notes a density of 12.5 dwellings per hectare will be achieved. In the absence of this evidence, I have identified the larger lots along Turners and Spencerville Roads, which appear to comprise approximately 60 lots, or less than 8% of the total development. While I accept that the inclusion of a broader range of lot sizes may offer greater choice than is typical of recent Christchurch developments, this is unlikely to be market-transforming. Accordingly, any associated benefits to consumer choice are likely to be minimal, and relate to a very small number of lots each year (approx. 6 per annum). Furthermore, I note that the first RFI

[47] Ibid, subsection 6.2.
[48] Ibid, subsection 8.3.
[49] Ibid, subsection 6.4.
[50] PPC23 2nd RFI Response Appendix 2 Graphic Attachment 28.8.25, p11.

response indicates a yield of approximately 15 households per hectare, with the majority of lots sized between 450-500m² and perimeter lots around 700m². If 15 households per hectare is achieved, then the lot sizes would be broadly consistent with existing supply and, as such, are unlikely to materially increase the variety of lot sizes available in the market. The table below shows the density used in the Economic Assessment, and the suggested density in the RFI response, along with the implied dwelling and average lot sizes.

Information Source	Households per ha	Developable Land (ha)	Implied Dwellings	Implied Lot Size (avg)
Economic Assessment (8.5)	12.5	64	800	800
First RFI Response (15)	15		960	667

(d) **Affordability**: the Economic Assessment notes that the development will not be as dense as other developments[51] with larger lots and it also suggests a higher construction cost than the average[52]. I agree that PPC23 is likely to have larger lots and average-higher end dwellings, which naturally means that the average price of the dwellings in this development will be higher than the market average sale price in Christchurch. In my opinion, it is likely that the sale price of the average dwelling in PPC23 will be higher than the average (greater than $642,000) and hence less affordable than the average Christchurch dwelling. This means that it is unlikely that the development will improve affordability. I consider that there is no evidence provided which supports the notion that the proposed development would materially improve housing affordability.

74. Finally, I note that the other benefits mentioned, Highest and Best Use and Investment Signals, are only covered in a single sentence each. There is no evidence presented that would suggest that these will be material. I consider that they are of little relevance to the assessment of the merits of PPC23.

75. In conclusion, I consider that PPC23 will generate some positive economic benefits. However, the quantified benefits in the Economic Assessment are overstated, and the benefits that were discussed qualitatively are unlikely to be material. While the Economic Assessment does not provide a robust

[51] Economic Assessment, subsection 8.3.
[52] QV Cost Build 2025.

estimate of the economic benefits, I agree that the development is likely to deliver some marginal economic benefit.

What are the economic costs of the proposed PPC23 development, and how should they be quantified?

76. I consider that the economic costs of the development are the loss of existing rural activity on the site, additional infrastructure costs, inefficient commercial provision, implications in terms of development pattern, and that there may be other externalities which are not discussed in the Economic Assessment.

77. First, it is standard practice for an applicant's economist to estimate the economic value of forgone rural production when assessing greenfield development proposals. In this case, the Economic Assessment notes that the subject land is currently used for rural production and is described as a "dairy farm", however no attempt has been made to quantify the value of lost production this farming activity ceases.

78. This quantification would have been a straightforward exercise. The applicant could have provided operational data for the existing farming activity, or the economist could have relied on publicly available benchmark information for Canterbury dairy farms.[53]

79. By way of indication only, applying average Canterbury dairy farm financial data to the land area of approximately 150 hectares (excluding the four rural lifestyle lots) suggests annual revenue in the order of $2.5 million and operating profit of approximately $1 million. These figures indicate that the opportunity cost of removing the land from productive rural use may be substantial.

80. As discussed above in my statement [64], I acknowledge that most of the land is highly productive (LUC2), and NPS-HPL does not apply to the SPZ land and may or may not apply to the small piece of rural land on one of the lifestyle lots. Regardless of whether the NPS-HPL applies, the development of the site for residential purposes would still result in the loss of existing economic activity i.e. rural production. No use of a resource, whether land or any other productive input is truly costless, and the Economic

[53] As an example, DairyNZ provides farm data publicly which can be used to estimate the current production. Benchmarking - DairyNZ.

Assessment is therefore deficient in failing to identify and account for this cost.

81. Second, a common issue with greenfield developments is that they require new infrastructure to enable development to occur. Councils plan for this by budgeting for infrastructure in their Long-Term Plans and charging appropriate development contributions to ensure that this costly investment is funded by growth in the areas that will be serviced. Notably, development contributions are set to recover the forecast cost of planned infrastructure. Importantly, infrastructure generally needs to be delivered ahead of growth, which means that if development in the planned areas occur more slowly than anticipated, the development contributions collected may not be sufficient to cover the upfront investment.

82. In the case of new, unplanned greenfield developments, growth can be diverted away from areas for which infrastructure has already been provided or planned. This can reduce development contributions collected in those locations, creating a funding shortfall that must ultimately be met by ratepayers. Such an outcome is inefficient, as it fails to optimise the use of existing and committed infrastructure.

83. Furthermore, unplanned greenfield development may require additional infrastructure investment, resulting in duplication, both in the planned areas that experience slower than expected growth and in the new greenfield area requiring servicing. Potentially, even if the unplanned greenfield development were to pay development contributions at the current rate, these charges may not fully reflect the marginal cost of extending or duplicating network infrastructure, particularly where scale efficiencies are lost or where the investment was not anticipated in council funding programmes.

84. The Economic Assessment does not adequately cover this matter, instead relying on generic and largely unsubstantiated statements to conclude that the proposal would have positive infrastructure benefits. In my view, there is a reasonable likelihood that the development would generate additional infrastructure costs, meaning that this aspect of the proposal could be adverse rather than beneficial economic outcome.

85. For the reasons outlined above, I consider that detailed infrastructure evidence should be provided, and that the largely theoretical assertions contained in the Economic Assessment are of limited assistance in

evaluating the economic outcomes and infrastructure implications of PPC23.

86. Third, the development is proposed to include a commercial centre which is intended to "meet the day-to-day convenience needs of residents"[54], the indicative scheme plan records "1.46ha COMMERCIAL" on the land shown as pink area[55], and the RFI responses suggest less than 3,000m^2 GFA within a Neighbourhood Centre Zones (**NCZ**)[56]. Finally, the Economic Assessment suggests that this centre could accommodate 10 jobs[57], the traffic assessment notes that the centre will "not attract trips from the wider network"[58], and the urban design report states "concept plans anticipating a preschool and 3-4 small-format retail or hospitality spaces"[59].

87. These various statements represent conflicting information within the application, and I consider that there is a risk that the development provides a large area of land for commercial activity, which would be inefficient. I agree that it would be sensible to include a small NCZ to "meet the day-to-day convenience needs of residents" and that demand would likely only support a small amount of floorspace (several shops and approximately 10 jobs). At this scale, this would be a dairy, takeaway, and café, all of which would be easily accommodated in less than 1,000m^2 GFA.

88. However, there is an inconsistency between the planned commercial land (1.5ha of NCZ) and the evidence presented by the economist, urban designer, planner, and transport experts, who are all suggesting a much smaller centre when measured by activity or floorspace.

89. If 3,000m^2 of GFA was feasible to be developed, that would equate to a site coverage of 20%, which is a very low site coverage for this type of centre. This begs the question of what happens on the rest of the land. It would be more efficient if the 1.5ha of NCZ land was reduced to allow other activities on this land.

90. The RFI Response from the applicant's economist suggests that PPC23 would need 0.24ha of land and 1,250m^2 of GFA.[60] This would mean

[54] s32 report, p12, point (e).
[55] PPC23 2nd RFI Response Appendix 2 Graphic Attachment 28.8.25, p17.
[56] PPC23 2nd RFI Response 28.8.25, Planz, p1.
PPC23 1st RFI Response Economics 29.07.2025, p3.
[57] Economic Assessment, subsection 8.2.
[58] PPC23 Appendix E Transport Novo Group April 2025, p17, para 44.
[59] PPC23 Appendix G Urban Design DCM Urban Desing Limited May 2025, p3, para 5.
[60] PPC23 1st RFI Response Economics 29.07.2025, p2.

approximately 1.2ha of land could be freed up and used for other purposes, such as housing.

91. From my own assessment, and from the RFI response of the applicant's economist, I consider that the proposed maximum of 3,000m^2 GFA is excessive, given the proposed number of residents and the neighbourhood role of the centre.

92. The RFI Response from the applicant's economist sets out examples of NCZ as the rationale for 3,000m^2 GFA limit.

(a) **Templeton**: which has a similar number of households and is located on the edge of Christchurch. The applicant's economist suggests that there is approximately 2,000m² GFA within the NCZ.

I have reviewed the parcels within the NCZ and consider that most premises are not operating primarily to "meet the day-to-day convenience needs of residents." Instead, they are likely to draw from a much wider catchment in order to remain viable. I note that some of the NCZ is located directly on State Highway 1, which influences the potential catchment and customers that will be drawn to these businesses.

By way of example, I note the following premises: Golden Mile Motel, Cavalier Trotting Products, Canterbury Equestrian, and Canterbury Antiques. Each of these businesses would necessarily rely on customers from well beyond the local area, and the location on State Highway 1 is likely to enable these businesses to capture customers from a wider catchment beyond Templeton.

In contrast, there is a small amount of genuine local convenience activity, namely Templeton Takeaway, Unichem Pharmacy, Number Five Café, and Templeton Medical, which are accommodated within less than 1,000m² of GFA.[61]

In my opinion this scale of local convenience is what was intended for PPC23, i.e. "several shops" and "10 jobs". The Templeton example does not support the applicant's economist's contention of needing 3,000m^2 GFA, instead it shows the opposite which is that much less floorspace is required.

[61] CoreLogic Property Guru.

(b) **Tai Tapu**: which is further from the edge of Christchurch, contains approximately 200 dwellings, and is noted as having 2,600m² GFA. Tai Tapu is different to PPC23, as it is located on the main highway to Banks Peninsula (State Highway 75), which contributes to a large number of drive-by customers. Also, it is surrounded by a large rural catchment which will also provide customers to the businesses in Tai Tapu. Furthermore, there is no NCZ within this settlement.

My review indicates that the local-convenience activities in Tai Tapu comprise a café (General Post), dairy (The Store), massage business (Be Lifted Body NZ), and an office (Generation Homes), which together occupy less than 1,000m² GFA.[62] In addition, the Tai Tapu Playcentre occupies approximately 450m² of GFA. At most there would be a 1,450m^2 GFA of local convenience activities in this settlement, and much of it would be supported by demand from outside of the community.

I also note the presence of a petrol station and automotive repair activities located on State Highway 75, which are clearly performing a wider function, i.e. highway-oriented function and rural support role, than would be anticipated for PPC23.

Accordingly, this example does not support the applicant's economist's contention that approximately 3,000m² of GFA being reasonable.

(c) **Parklands**: a centre of approximately 1.3 hectares of land which is zoned Local Centre Zone. The land area of this centre is smaller than is proposed in PPC23, but it is zoned for a higher role than PPC23.

This centre accommodates a wide range of stores: a supermarket (FreshChoice), fish and chips, Indian restaurant, New Wok, Subway, sushi outlet, beauty salon, law office, Bay Audiology, Harcourts, Unichem Pharmacy, Liquor store, Queenspark tavern, and a café. Together these activities occupy almost 5,000m² of GFA.[63]

I consider that this example demonstrates what could readily be accommodated within the land proposed for PPC23, and that this scale of commercial activity would inevitably serve a much wider role and catchment than is intended for PPC23 and therefore would not be

[62] CoreLogic Property Guru.
[63] CoreLogic Property Guru.

consistent with the intended function of the proposed NCZ. In my opinion, this example provides clear evidence that the land identified in PPC23 for commercial activity is oversized relative to its stated purpose.

93. While I agree that an upper limit of 3,000m² of GFA would minimise the impacts on other centres in the hierarchy, I do not agree that providing this quantum of space is appropriate for PPC23.

94. In my view, in order to be viable, businesses occupying this amount of GFA would need to attract a substantial number of customers from beyond the PPC23 catchment. That scale of GFA would allow dozens of stores (not several) and potential for larger premises (like a small supermarket). For these businesses to be viable, they would need to attract customers from outside PPC23, shifting demand away from other centres in the network and affecting how those centres operate. These outcomes would have implications for traffic generation, urban design outcomes, and other aspects of the application evidence.

95. I consider that the proposed 1.5ha of NCZ land is inefficient, and that there would be an economic cost if an excessive amount of land were zoned for NCZ but not taken up by development. Moreover, if 3,000m^2 of floorspace were to be developed, there would remain a risk that a proportion of the area could remain vacant for an extended period, potentially for decades, thereby imposing a cost on the wider community.

96. Fourth, I consider that there may be implications in terms of the development pattern in the urban environment. Potentially other more favourable development sites may not be developed, or may be developed later, if PPC23 proceeds. The Economic Assessment has not considered where the households may have located under the baseline (counterfactual), therefore it is not possible to establish from the evidence provided, whether or not, the development would be positive in terms of the Urban Environment. Nevertheless, the PPC23 area is located in close proximity to urban Christchurch, and there are benefits to that location relative to less proximate development areas such as some areas in Waimakariri.

97. Finally, there are always externalities associated with land use, whereby costs and benefits flow from an activity onto others in the community who are not party to the development. While I accept that under the RMA in

most instances these costs and benefits are assessed by other experts (for example noise, environmental, social, cultural, and transport effects), it is common practice for an economic assessment to acknowledge such externalities because they can influence overall economic outcomes. The Economic Assessment has not provided a discussion of potential externality costs. In my opinion, this should have been included, at least to note whether such effects are being addressed elsewhere in the application evidence.

Does the economic benefits outweigh the economic costs, hence the overall merits from an economic perspective?

98. In my opinion the Economic Assessment does not provide sufficient information from which to support a conclusion as to whether PPC23 would result in an overall net benefit or an economic efficiency gain.

99. In my opinion, the economic benefits of the proposal are likely to be small but positive, while the associated costs are likely to be smaller. Accordingly, I agree that the development is likely to be positive in net terms, however I consider that the Economic Assessment overstates the magnitude of those benefits.

5. SUBMISSIONS ON PPC23

Spencerville and Ouruhia Residents

100. The Spencerville and Ouruhia Residents Group (SOR), along with a number of individual submitters, have lodged submissions raising the same matters opposing PPC23. In this evidence, I respond to these submitters collectively. I have reviewed their statements and respond below, and summarise the points with which I agree and disagree.

SOR Submissions - Points of agreement

101. First, the SOR submissions outline concerns about externality costs such as negative transport impacts[64], potential natural hazards[65], infrastructure impacts[66], ecological impacts[67], amenity[68], and noise[69]. While these points will be addressed by other experts, it does indicate that there are potential

[64] Para 6.1-6.29.
[65] Para 7.1-7.4.
[66] Para 8.1-8.3.
[67] Para 9.1-9.2.
[68] Para 10.1-10.2.
[69] Para 13.

externalities which could have costs which are not considered in the Economic Assessment.

102. I consider that the SOR submitters may have legitimate concerns regarding these matters. As an example, the Economic Assessment relies on generic and largely theoretical discussion of the transport and infrastructure impacts. I do not consider that the Economic Assessment provides sufficient evidence to support its findings of positive transport benefits or optimal infrastructure outcomes, as claimed.

103. Second, the SOR submitters contest that the economic benefits in the Economic Assessment are "exaggerated".[70]

104. I agree, and as I have discussed above the Economic Assessment provides estimates of economic benefits that I consider to be overstated. Moreover, the Economic Assessment has not provided an assessment of economic costs.

105. Third, the SOR submitters are concerned that there are no guidelines on the types of activities that are permitted in the commercial area. They would like hours of operation controlled and restrictions on "antisocial or toxic activities e.g. public bars, liquor store, vape stores, etc".[71]

106. I agree, there should be some control on the activity enabled in the commercial area so as to avoid the potential for retail distribution effects. The potential antisocial activities raised in the submissions are outside my area of expertise. My understanding is that a new proposal has been suggested by the applicant's planner in the RFI response that the commercial land be covered by the NCZ framework from the District Plan.[72]

107. I agree with this approach and consider that this application of the NCZ framework would appropriately address the types of activities that should be enabled in the area. However, I reiterate my view that the scale of land identified and the maximum GFA proposed do not align with the local needs of the community and would result in inefficient outcomes.

[70] Para 11.
[71] Para 10.
[72] PPC23 2nd RFI Response 28.8.25, Planz, p1.

108. Fourth, the SOR submitters consider that there is no evidence presented in the Economic Assessment that there is demand for residential development in this area.[73]

109. I agree that the Economic Assessment has not provided evidence of residential demand specific to this location, nor that such residential demand is inherent to this development. I consider that the development is likely to attract residents who would otherwise have lived elsewhere within the Urban Environment, and across a range of alternative locations.

110. Fifth, the SOR submitters question whether the development of 800 dwellings is achievable as the applicant only owns 64ha of the 170ha site.[74] I note that the other landowners have submitted on the hearing as follows:

(a) Tipple (58): owner of 88ha of farm (144 & 165 Turners Road) supports PPC23.

(b) Gramco (52): owner of lifestyle of 5ha (176 Turners Road) supports PPC23.

(c) Casey (7): owner of lifestyle of 5ha (176 Turners Road) supports PPC23 but “intend on remaining on our property”.

(d) Shaw (5): owner of lifestyle of 5ha (220 Turners Road) neutral on PPC23 and “non committal”.

(e) Cockerell (64): owner of lifestyle of 5ha (174 Turners Road) opposed PCC23 and for a number of reasons. However this submission has now been withdrawn.

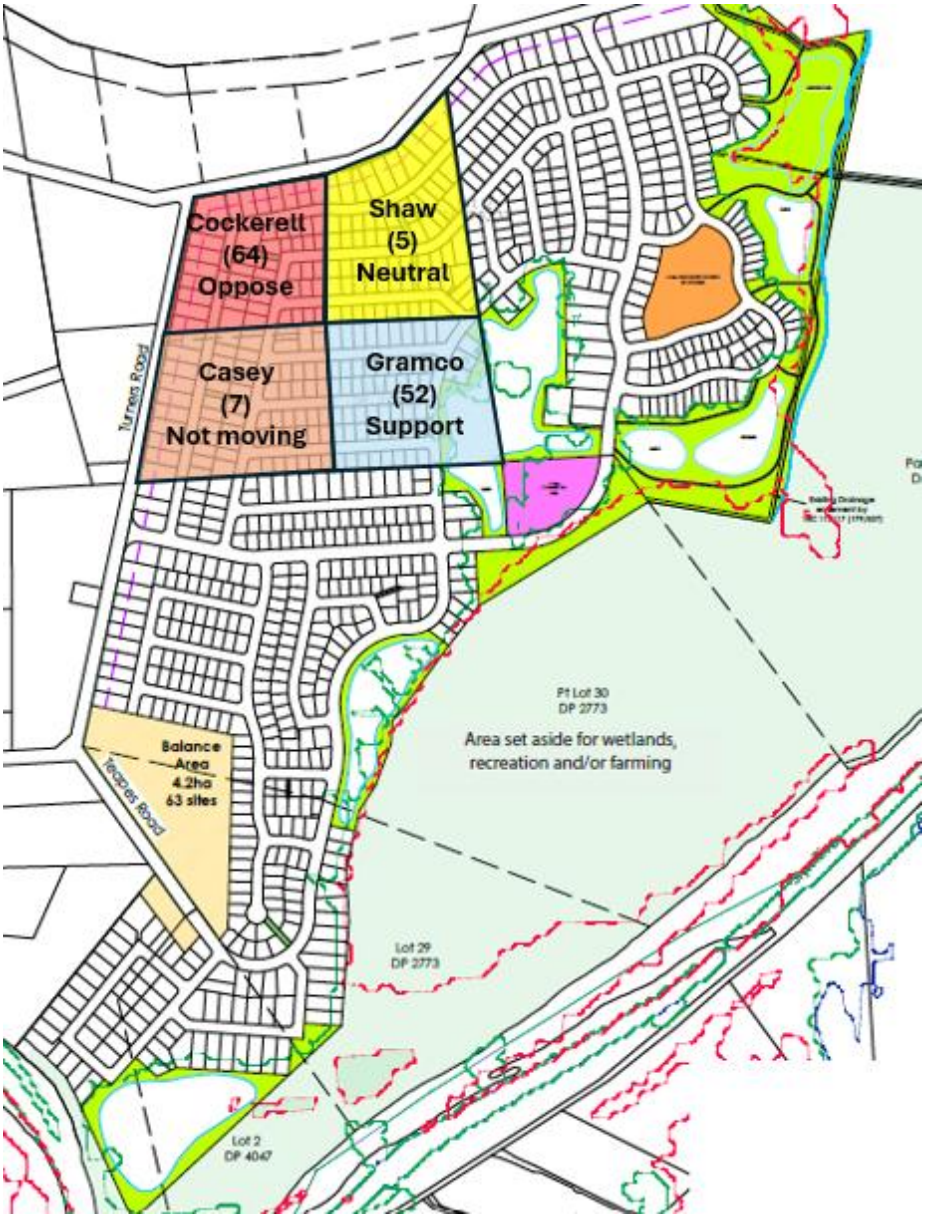
111. Both of the owners of the SPZ Golf Resort land support PPC23 (i.e. the applicant and Tipple). However, some of the owners of the lifestyle lots that are Rural Urban Fringe Zone either non committal, do not intend to move, or did not support. Only one appears to support the development of their land and be willing to undertake the development (Gramco).

112. The three landowners that are not committed to the development of their land have the parcels on the edge of the development along Turners and Spencerville roads (shown below in Figure 1, red, yellow, and orange parcels). I agree with the SOR submitters that the non-development of

[73] Para 14.
[74] Para 18.

these sites could have implications for the development, and I estimate that there are around 179 lots in the three parcels.

Figure 1: Rural Lifestyle Land Owners Position



113. If these three parcels (owned by Cockerell, Shaw and Casey) are not developed, then capacity in PPC23 would fall to around 621 lots (52 dwellings on Gramco land and 569 dwellings on the SPZ Golf Resort land held by the applicant and Tipple). In this case the resulting yield is less than modelled in the Economic Assessment, therefore economic benefits would reduce proportionally, and the size of the centre required to support those households would also need to be reduced. However, I acknowledge that landholder willingness to develop can and does change over time, therefore

these benefits may simply be deferred and spread further into the future than is shown in the Economic Assessment.

SOR Submissions - Points of disagreement

114. There is one point on which I disagree with the SOR submitters, that being that they consider that the development will result in a negative outcome to the community.[75] I interpret this as meaning a negative net economic outcome for the Christchurch District or the wider Urban Environment.

115. In my opinion, the development may result in a net positive outcome. Notwithstanding, my position that the Economic Assessment has overstated the quantum of the benefits, and that the net economic outcome is likely to be materially smaller than implied in the report. Therefore, I disagree with the submitters on this aspect.

Environment Canterbury Submission

116. The ECan submission is neutral in relation to PPC23. However, ECan raises a number of matters that require consideration, including issues that have economic implications.

ECAN Submission - Points of agreement

117. First, ECan submission focusses on Policy 8 of NPS-UD and observes that unplanned development risks placing growth in locations that are not appropriate, which can lead to poor urban form, and higher infrastructure costs.[76] ECan submits that there may be additional infrastructure costs required to allow the development of PPC23 and the development is inconsistent with policy of encouraging growth to encourage active and public transport network. Also, that the site is not identified as existing urban, future development area or greenfield priority in Map A of CRPS.

118. I agree with ECan that there may be negative infrastructure and transport costs associated with developing PPC23, and that the site is not defined as urban within the CRPS. These issues are important in terms of the assessment of PPC23 and as discussed in my evidence, they are not adequately covered in the Economic Assessment. I also agree with ECan that these issues are not “insurmountable”, but they should still be considered when assessing the merits of PPC23.

[75] Para 11.
[76] Para 3.1-3.8.

119. Second, ECan outlines concerns about potential issues associated with natural hazards, ecology, contaminated land, freshwater systems and flooding.[77]

120. I acknowledge these points, and consider that these potential externalities associated with the development of PPC23 could have economic implications which are not addressed in the Economic Assessment.

121. Third, ECan notes that the development will require a range of resource consents. The ability of the developer to obtain these consents, and the associated costs, may affect the feasibility of the development and the appropriateness of the plan change.

122. I accept that there may be additional costs associated with obtaining resource consents, and that these may affect the feasibility of the development, or components of the development. Whether this would result in a material change to the development would depend on evidence presented by other experts. However, I consider that this issue is not relevant to economic outcomes.

ECAN Submission - Points of disagreement

123. I have no points of disagreement with the ECan submission.

Local Business Submissions

124. There are submissions by local businesses which support PPC23, Lange (8) and Ouruhia Model School (59).

Local Business Submissions - Points of agreement

125. The submission from Mr Lange, who is a local builder, is that there is a shortage of greenfield capacity in Christchurch City, and allowing PPC23 would provide housing options near the city

126. I note that the Economic Assessment has not established whether there is a shortage or not. However, my indicative assessment in this evidence suggests that there may be a need for additional greenfield residential supply in Christchurch towards the middle of next decade (i.e. after 2035). Therefore, I agree with Mr Lange, and consider that PPC23 could be beneficial in terms of providing greenfield capacity.

[77] Para 3.9-3.14.

127. The submission from Ouruhia Model School is that the development of PPC23 would result in more children living in the area and this would mean that their school would have a larger student role. This would be efficient use of education infrastructure as the school has excess capacity to meet this demand. However, the school supports staging of PPC23 to allow the school to manage staffing levels to meet the demand.

128. I accept this position, and consider that there may be benefits for the school in terms of increased role and efficient use of the education infrastructure if PPC23 was developed. Potentially staging could be adopted by the applicant to address the School's concerns.

Local Business Submissions - Points of disagreement

5.30 I have no points of disagreement with local business submission.

Other Submissions

129. There are submissions by other local residents which include economic issues, which I review below as a group.

130. The submission by other local residents note the following issues:

(a) result in additional infrastructure costs (22, 32, 54, 71, and 75).

(b) negative transport implications in terms of local network and across the wider network (22, 30, 34, 71), with the new residents needing to travel to meet most of their daily needs.

(c) range of externalities which includes hazards, noise, dust, ecological, social, amenity, and cultural values (22, 32, 34, 54, 65, and 75).

(d) the Economic Assessment overstates economic benefits (22).

(e) question whether the development is practically feasible because the developer does not own all of the land (22, 32, 540).

(f) whether golf course development is in fact not feasible (30),

(g) concerned that there is no demand for the smaller lots (30, 34).

(h) will not provide low cost housing or genuinely affordable housing (54).

(i) no evidence provided that other alternatives for accommodation demand in the Urban Environment are not available or better, and that

PPC23 will result in urban sprawl which is inconsistent with NPS-UD, CRPS and District Plan (30, 32, 34, 71, and 75).

(j) The location of the proposed commercial centre within the PPC23 means that it will not be accessible to drive by trade or non-residents, which will undermine the viability of the centre (75).

131. I agree with many of the points raised by the submitters, and note that I have covered these issues in my statement of evidence above. I do not repeat my position for points (a) to (e), or (h)-(i), and focus instead on points (f), (g), and (j).

132. First, I disagree with issue (f) and consider that the golf course development is unlikely to be developable, and should not be considered as the baseline from which PPC23 is assessed. As noted above, if this alternative was viable then it would have been developed at some point over the last decade and half.

133. Second, I disagree with issue (g) and consider that there is demand for a range of lots and that smaller lots have been provided by the market in the Urban Environment. If lots were provided in this range, then I would expect that they would be sold and developed.

134. Third, I agree with issue (j) and consider that the commercial area is located within PPC23 and will not be readily accessible to drive-by customers or to the wider community outside of PPC23. As a result, the level of commercial activity within this centre is likely to be limited, given the relatively small turnover that can be expected from residents within PPC23 alone. As noted earlier in my evidence, I am concerned that the amount of land and GFA proposed is not commensurate with the convenience needs of the community and is therefore likely to be inefficient.

6. CONCLUSION

135. In summary, I consider that it is likely that the overall benefits associated with PPC23 may outweigh the costs, which means that the development can be expected to generate a net positive outcome for the community.

136. However, I consider that the Economic Assessment from the applicant overstates the economic benefits and does not address the economic costs. Therefore, it is not possible to quantify the exact scale of the

economic outcome, and the extent to which the development will generate net benefits.

137. I consider that the newly proposed framework for the commercial centre (NCZ of less than 3,000m^2 GFA) is likely to lead to an inefficient use of land within PPC23. I recommend that the land area for NCZ be reduced to 0.24ha (or equivalent to around 1,000m^2 GFA), which aligns with the estimated area suggested by the applicant's economist in the RFI Response.

138. The submissions presented by the submitters have not resulted in changes to my conclusions in regard to the Economic Assessment and the economic merits of PPC23.

Rodney Yeoman



14 April 2026

APPENDIX 7 – REVIEW OF PPC23 AND SUBMISSIONS RELATED TO LANDSCAPE MATTERS BY NICOLA SMETHAM, SENIOR LANDSCAPE ARCHITECT AT ROUGH MILNE LANDSCAPE ARCHITECTS

BEFORE INDEPENDENT HEARING COMMISSIONERS

IN CHRISTCHURCH

TE MAHERE Ā-ROHE I TŪTOHUA MŌ TE TĀONE O ŌTAUTAHI

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the hearing of submissions on Private Plan Change 23 Whisper Creek, Spencerville to the Christchurch District Plan

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STATEMENT OF PRIMARY EVIDENCE OF NICOLA (NIKKI) SMETHAM ON BEHALF OF CHRISTCHURCH CITY COUNCIL

Dated: 15 April 2026

STATEMENT OF EVIDENCE OF NICOLA SMETHAM

EXECUTIVE SUMMARY

1 My full name is Nicola (Nikki) Jane Smetham. I am a Senior Landscape Architect with Rough Milne Mitchell Landscape Architects Limited (RMM), formerly Rough and Milne Landscape Architects.

2 I have prepared this statement of evidence on behalf of the Christchurch City Council in respect of landscape matters arising from the material provided and further information requests regarding Private Plan Change 23 Whisper Creek (PPC23) to the Christchurch District Plan (the CDP).

3 In my evidence I have primarily responded to the Landscape Assessment provided by Mr David Compton-Moen of DC-M Urban Ltd and the various submitters to the PPC23. I have also drawn on the evidence of other discipline experts, acting on behalf of the Council, including Ms Josie Schröder.

4 My evidence focuses on landscape outcomes of the proposal, and whether, in respect to landscape outcomes, the:

- rezoning to the proposed Residential New Neighbourhood Zone (RNNZ) is appropriate.

- associated District Plan provisions, including the proposed Outline Development Plan (ODP), will be effective in addressing effects on landscape values.

- alternate relief sought by the submitters is appropriate and

- whether additional advice is required from the Applicant to ensure the rezoning is appropriate.

5 This evidence reviews and responds to the applicant's Landscape and Visual Impact Assessment (LVIA), considers relevant submissions, and assesses whether the proposed rezoning to Residential New Neighbourhood Zone (RNNZ), together with the Outline Development Plan (ODP) and associated provisions, will achieve appropriate landscape outcomes in accordance with the Christchurch District Plan (CDP).

6 While the LVIA adopts a generally appropriate methodological framework, its application is inconsistent and lacks the level of detail required to support its conclusions. In particular, there are deficiencies in the description of the proposal, characterisation of the receiving environment, identification of landscape values, and integration of landscape and visual effects. Importantly, the LVIA does not undertake a robust comparison with the permitted baseline established by the Specific Purpose (Golf Resort) Zone (SPRZ).

7 PPC23 proposes a substantial change in land use, enabling up to 800 residential units and associated urban development. This represents a fundamental shift from the open, low-density, and predominantly vegetated character anticipated under the SPRZ, to a more intensive and visually prominent urban form.

8 In my opinion, the LVIA overstates the potential positive effects associated with ecological restoration, open space, and amenity, while understating adverse effects. Many of the identified benefits are uncertain and not sufficiently secured through the proposed provisions. Conversely, the adverse effects on rural character and amenity—particularly at the interface with the surrounding Rural Urban Fringe Zone—are likely to be moderate to high.

9 The visual assessment underpinning the LVIA is insufficient. It does not adequately account for key factors including the permitted baseline scenario, the extent of earthworks and raised ground levels required to address flood hazards, or the timeframes necessary for mitigation planting to establish. As a result, the LVIA does not provide a reliable basis for concluding that visual and landscape effects will be low.

10 Notwithstanding these concerns, I consider that the ODP provides a framework capable of accommodating development. However, in its current form, it does not adequately ensure outcomes that are consistent with the objectives and policies of the CDP, particularly in relation to maintaining rural character, protecting amenity values, and achieving appropriate integration with the surrounding environment.

11 In my opinion, the proposed mitigation measures are insufficient to address the scale and intensity of development anticipated by PPC23,

particularly in the short to medium term. Additional and more robust controls are required to reduce adverse effects.

12 I recommend that amendments be made to the ODP and associated provisions, including increasing the size of a proportion of perimeter lots, increasing building setbacks and internal separation distances, reducing building height along key interfaces, strengthening landscape provisions, and incorporating Ngāi Tahu Subdivision and Development Guidelines.

13 Subject to these amendments, I consider that adverse landscape and visual effects could be reduced to a **low** to **moderate** level. However, as currently proposed, PPC23 does not adequately address landscape and visual effects and does not fully achieve the relevant objectives and policies of the CDP.

INTRODUCTION

14 I am a Senior Landscape Architect with Rough Milne Mitchell Landscape Architects Limited (RMM), formerly Rough and Milne Landscape Architects.

15 I hold a Bachelor of Landscape Architecture from Lincoln University. I am a registered member of the New Zealand Institute of Landscape Architects (NZILA), and a member of the Resource Management Law Association of New Zealand.

16 I have over 25 years' experience as a landscape architect and for the last 20 years I have specialised in landscape assessment work. This has included undertaking landscape and visual effects assessments associated with a wide variety of development proposal throughout New Zealand. Work of relevance includes proposed developments in Queenstown Lakes District, Central Otago, Dunedin, Hurunui, Christchurch / Banks Peninsula, and the Selwyn District. I have previously presented expert evidence at council hearing and before the Environment Court.

17 I have been involved in a number of plan changes and subdivision applications relevant to the proposal including but not limited to the Christchurch District, including:

17.1 The preparation of landscape evidence for The Clearing, Amberley on behalf of the HDC.

17.2 Sticky Forest, Ravenswood PPC, Tarras Subdivision, Damper Bay, Mt Iron Junction, single lot subdivisions, Gherkins Road, Maltworks Retirement Village,

17.3 I have undertaken various peer reviews of landscape and visual assessments throughout the South Island.

18 I am familiar with the private plan change (PPC23) application by LMM Investments Limited (*the Applicant*) at 144-176 Turners Road, 174-240 Spencerville Road, and 161 Lower Styx Road, Ouruhia, Christchurch.

CODE OF CONDUCT

19 I have read the Environment Court's Code of Conduct for Expert Witnesses in its Environment Court Practice Note 2023 and I agree to comply with it. My qualifications as an expert are set out above. I confirm that the issues addressed in this brief of evidence are within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

SCOPE OF EVIDENCE

20 I have been engaged by the Christchurch City Council to provide an evidence statement on the proposed Private Plan Change (PPC23) that provides my expert opinion on landscape matters including the appropriateness of the proposed landscape provisions and Outline Development Plan (ODP) to meet the objectives and policies of the Christchurch District Plan (CDP).

21 PPC23 comprises multiple properties located at 144-176 Turners Road, 174-240 Spencerville Road, and 161 Lower Styx Road, Ouruhia, Christchurch (the site). PPC23 proposes to rezone 170 ha of land from the Rural Urban Fringe Zone (RuUFZ), Specific Purpose (Golf Resort) (SPRZ) and Open Space Water and Margins Zone (OWMZ) to Residential New Neighbourhood Zone (RNNZ), and RuUFZ.

22 My evidence will deal with the following:

22.1 A review of the Landscape and Visual Impact Assessment (LVIA) and supporting graphic attachment (GA) prepared by DCM Urban Design Ltd (DC-M) to determine whether the methodology and findings are appropriate.

22.2 Whether the ODP and proposed provisions will achieve desirable landscape and visual outcomes.

22.3 Whether the ODP and proposed provisions will be consistent with provisions of the CDP specifically related to landscape and amenity matters.

22.4 Whether the ODP and proposed provisions and the zoning and future activities enabled by it will integrate with the surrounding area.

22.5 A review and statement of the relevant submission points relating to landscape and visual effects.

23 In preparing my evidence, I have reviewed the notified PPC23 and following documents:

23.1 Appendix F – Landscape.

23.2 Appendix Fi - Landscape Graphics.

23.3 Appendix G – Urban Design Assessment.

23.4 RFI Responses including the Graphic Attachment.

23.5 Appendix I – Cultural Preliminary Report.

23.6 PPC Request s32 Report.

23.7 Summary of Submissions relating to landscape matters.

24 This evidence should be read in conjunction with that of Ms Josie Schröder, Urban Designer, who provides evidence on behalf of the Council, and whom I reference in my evidence.

THE PROPOSAL

25 In summary, PPC23 relates to land at 144, 156 and 176 Turners Road and 174, 220 and 240 Spencerville Road and 161 Lower Styx Road.

26 It seeks to enable residential development and anticipates that 800 households and a neighbourhood commercial centre could be developed. If the rezoning is approved the scope of the private plan change includes:

- To rezone the operative SPRZ and RuUFZ on the upper terrace to RNNZ; and
- To rezone the lower terrace areas subject to the High Flood Management Area from SPRZ to RuUFZ;
- To enable a Neighbourhood Centre to be located at the site;
- Retain the existing OWMZ along the Pūharakekenui-Styx River; and
- Amend provisions in the Christchurch District Plan (CDP) that are relevant to the site, including inserting a new Outline Development Plan (ODP) to guide development of the site.

REVIEW OF LANDSCAPE AND VISUAL IMPACT ASSESSMENT

27 The PPC23 application includes a landscape and visual impact assessment (LVIA) prepared by DC-M Urban Design. I prepared the following peer review, which is consistent with Te Tangi a te Manu (TTaTM), the New Zealand Institute of Landscape Architecture guidelines for landscape assessment. The peer review is an appraisal of the LVIA and not a parallel assessment.

28 My peer review is structured according to the headings below and includes my review comments below each section. I refer to the seven-point scale set out in TTaTM where I assess the degree of effects. I also make reference to the GA (refer Appendix Fi Landscape Graphics that is attached to the LVIA) throughout my evidence. The structure of my review follows the principles set out in TTaTM with a focus on:

- The methodology and application of methodology in the LVIA
- Clarity and detail of the proposal description
- Characterisation of the receiving environment, site and identification of landscape values

- Identification and assessment against statutory provisions
- Identification and assessment of landscape effects
- Effectiveness of design and mitigation response
- Whether the LVA 's conclusions are credible and consistent with the analysis.

29 I undertook a site visit on Thursday 12 March accompanied by Ross Moffat, the applicant; Jonathan Clease, Planner from Planz Consultants; CCC City Planning Team Leader Sarah Oliver; and Josie Schröder, Urban Planner from Urban Opera NZ Ltd.

Methodology and Application of Methodology in the LVIA

30 In overall terms, the LVIA adopts a clear methodology, consistent with TTaTM and aligned with NZILA guidance. It appropriately combines desktop analysis and fieldwork to characterise the receiving environment and assess landscape and visual effects, with a defined 2 km study area that is considered suitable in this context. The assessment framework—encompassing identification of effects, evaluation of their magnitude (both pre- and post-mitigation), and consideration of landscape character, values, and visual amenity—suggests a comprehensive basis for evaluating PPC23, including its alignment with relevant objectives and policies of the Christchurch District Plan.

31 ***Comment****: I find overall the methodology, including Appendix 1, is adequate for PPC23, despite not being fully applied throughout the LVIA.*

32 *The division of Methodology sections is confusing with Appendix 1 containing generic information that is irrelevant to PPC23. Reference to the A3 colour Graphic Attachment containing the ODP, and Elevated Perspectives A – C provided to illustrate PPC23 would assist in understanding the Proposal. Further the orientation of the plans and maps, with North either vertical or horizontal makes it difficult to orientate and assimilate information. The use of different scales between maps and plans is also confusing and unhelpful.*

33 *I find overall the methodology, including Appendix 1, as stated accords with the TTaTM guidelines, but is not fully applied throughout*

the LVIA and therefore results in fundamental concerns that influence the reliability of the LVIA to identify and address visual concerns.

Clarity and Detail of the Proposal Description

34 The background and current zoning are described under the proposal highlighting the difference between the existing land use and the permitted baseline. This is included as an important aspect underpinning the rationale for the PPC23. The proposal is briefly described and refers to an indicative scheme plan prepared by Davie Lovell Smith to understand how the site could potentially be developed. Refer GA, Page 17. Also illustrated by the Concept Masterplan, refer GA, Page 11.

35 The larger lots along the western fringes of the site, pockets of medium density, a centralised small commercial area and a large area of wetland, recreational open space are described. The description states that walkway and cycleway connections are intended to be created throughout and from the site to connect future residential, schools and other urban areas.

36 Mitigation measures are set out and include:

MM1-A 5m native planting strip along Teapes, Turners and Spencerville Roads with the retention of existing planting where possible to screen development from surrounding roads and providing an ecological corridor.

MM2 – A 10m building setback from the road frontages.

MM3 - Recommended boundary treatments as post and rail and post and wire along the Proposed Rural Interface.

MM4 – No private vehicle crossing from existing roads to future residential lots.

MM5 – Opportunity for enhancement of open green space and wetlands for ecological, recreational and amenity values including public access through a pedestrian / cycle network. And mitigation of views of the PPPC from Lower Styx Road by green space separation.

MM6 – Potential ecological restoration of the Pūharakekenui-Styx River margins. The PPPC will facilitate opportunities for riparian

restoration and recreational trails to improve recreational values along the Pūharakekenui-Styx River.

37 **Comment**: *I find that the Proposal description to be too broad and it lacks an appropriate degree of detail that can be relied on to assess the effects on landscape values. Despite this I have been able to substantiate a position with reference to other material that forms part of the notified PPC23.*

38 *The Proposal relies on the Davie Lovell Smith Subdivision Plan / Scheme plan and the DCM Concept Masterplan to describe and assess the potential landscape and visual effects. While these are useful in terms of illustrating a potential subdivision outcome, I consider effects must rely on the ODP rather than an indicative scheme plan and should reference the proposed plan provisions including the proposed ODP narrative in Chapter 8.*

39 *My following comments refer to the RFI responses, which I rely on for my understanding of what is intended by PPC23 and with reference to the ODP narrative included in the amendments to Chapter 8.10.*

40 *The site includes land owned by the applicant on the true right bank accessed by an existing bridge. The ODP shows three access points into the site. The three reserve areas are located along terrace boundary with one providing internal open space. The reserve areas are clarified in RFI 1 as local parks with playground facilities collocated with stormwater treatment and attenuation facilities. The function of the stormwater facilities is understood to also be available for passive recreation by the community and where appropriate would include native planting compatible with their stormwater function.*

41 *Critically there is no description of the Proposal in relation to the landforms, i.e. terrace with reference to ground levels or elevation and the likelihood of substantial fill (noted in RFI 1 as approximately 400mm of fill) being required to meet flood levels.*

42 *RFI 1 clarifies the status of the RuUFZ / Rural Open Space and Recreation area shown on the ODP as the balance of farmland between the stormwater basins and riparian margins. The options of the long-term management of this land are 1) retained as farmland or 2) restored as wetlands or 3) developed for recreation purposed by others. I understand it is unlikely the Council will undertake the*

restoration of this area given the costs involved. It is acknowledged that in the short term the open space area will likely remain as farmland used for pastoral grazing rather than restored as a wetland.

43 *Overall, I have difficulty in appreciating the level of planting that will occur as part of the stormwater reserve areas and OWM Zone and that the LVIA relies on as affording amenity and screening / mitigation and compensation. And similarly, the potential for ecological enhancement. While I agree that there will be ecological and natural character benefits through the development of the stormwater basins, and Spencerville Drain restoration, the wetland creation and the Pūharakekenui-Styx River riparian margin restoration are only potential benefits that may or may not be realised. The LVIA does not make this distinction and therefore tends to overstate the benefits and understate the adverse effects.*

44 *Much of this information is key to being able to establish whether the outcomes expressed in PPC23 can be achieved or realised. I accept that planting plans for stormwater basins and wetlands would typically be determined through resource consenting and in accordance with CCC design guidance and I rely on DC-M graphics as illustrating a likely outcome.*

45 *The Spencerville Drain treatment is not referred to in the Proposal, despite being an identifiable site feature. RFI Response 1*[1] *refers to the Spencerville Drain as an existing modified waterway that runs in a SW – NE direction along the bottom of the upper terrace and states that this waterway will be restored and enhanced with the steep banks graded back to provide a more natural function with enhanced ecological values.*

46 *Chapter 8 amendments at 8.10.3X.C Development Form And Design state – 'Where the RNN abuts or is opposite properties in the Rural Urban Fringe Zone larger section sizes are anticipated, with planting buffers and building setbacks along the area's external road edges with Teapes Road, Turners Road, and Spencerville Road. These sites shall be of a size that provide for future subdivision with potential vehicle access from these road edges'.*

[1] RFI Response 1 – 8 C).

47 *According to RFI 1 the perimeter lots are anticipated to be in the order of 600 – 700 m^2 with the majority of internal lots are 450 – 500m^2 with short sections of terraces or other medium density typologies around 200m^2 / unit. RFI 1 states that the boundary planting / Rural Interface Treatment is to be maintained at a minimum height of 5m.*

48 *RFI 1 anticipates the commercial centre to include preschool, café and small cluster of local shops.*

49 *I conclude that the LVIA Proposal description is inadequate in providing an understanding of the actual and potential effects on landscape values. Notwithstanding this, the information provided in the RFIs and the ODP narrative contained within proposed changes to the CDP provisions is sufficient to enable my understanding of the Proposal.*

Characterisation of the Receiving Environment, Site and Identification of Landscape Values

Receiving Environment

50 The relevant landscape is broadly identified within the context of the site referring to the proximity of Pegasus Bay, Waimakariri River, Christchurch city and SH74. The site is described as being on the semi-rural periphery of Christchurch with features noted as points of interest including the Pūharakekenui-Styx River along the southern / southeaster boundary of the site. Various attributes such as topography are mentioned with open space and planting dominating. Built form and varying densities are noted.

51 The most prevalent land use is described as productive agriculture at various scales, and forestry interspersed with the Everglades Country Gold Club and Waitikiri Golf Club and an eclectic mix of small home-based businesses present. Semi-rural residential living is described as commonplace comprising larger allotments, lifestyle blocks and the presence of Spencerville as an urban area is noted.

52 The recreational opportunities are listed and the potential link to the Pūharakekenui-Styx River "Source to Sea network" is referred to but not described. The changing open and enclosed nature of views experienced from the surrounding roads is identified. The quiet rural pastoral environment surrounding the site is stated as a contrast with

established areas of urban Christchurch. The natural character of the landscape (receiving environment) is considered to be modified with a semi-rural character.

Site

53 The terrace landform is acknowledged and described as historic sand dunes with the lower terrace, consisting of alluvial deposits and silts and noted as flood prone with an overall level change of approximately 2m between the terraces.

54 Key roads surrounding the site are described as Spencerville Road, Lower Styx Road and Turners Road with Spencerville and Lower Styx roads classified as collector roads and Turners Road as a local road.

55 The site is described as comprising several properties and these are individually described. The bulk of the site is the farm property at 240 Spencerville Road and contains a small forestry block two residential dwellings and various farm sheds. Four lifestyle properties each 4 – 5 ha in size are located at the corner of Turner and Spencerville roads. The farm property at 144 Turners Road is described separately from 165 Turners Road, which forms the southernmost balance of the site despite both properties being owned by the Tipple family. These properties contain pasture, mature boundary planting, two residential dwelling and various farm sheds clustered at the southern end accessed via Teapes Road.

56 The natural character of the site is noted by the LVIa as modified with a rural and semi-rural lifestyle block character.

57 ***Comment:*** *Overall, I find the description of the receiving environment and the site to be superficial and deficient in the level of detail expected to inform the design and a comprehensive assessment of effects on landscape values arising from PPC23.*

58 *The description of the site as it exists and as anticipated by the SPRZ is important as informing landscape values and the subsequent effects. Based on the information gleaned from the RFIs, ODP provisions, reports by others I have set out below important information and key details to determine the likely effects on landscape values arising from the PPC23.*

59 *I set out further observations and analysis of the context of the proposal in my Landscape Assessment Discussion and Summary in paragraphs 134 - 159 to allow me to reach a conclusion on the effects on landscape values.*

60 *The receiving environment is legible and expresses the land formation by river, estuarine and coastal processes that result in areas of localised dunes and subtle topography relating to the location and proximity to the coastline with underpinning soil types etc. Under the CDP the Pūharakekenui-Styx River has a Natural Landscape overlay (S.F3.0) CDP, with values set out in Appendix 9.2.9.1.3a. The Pūharakekenui-Styx River is a low gradient, narrow, meandering single-thread channel that discharges into the sea via Brooklands Lagoon and the Waimakariri River. The distinctive oxbow meander at the southern end of the site is a feature of the river corridor adjoining the site. The Spencerville Drain is a consequence of the low-lying land, land-use and the underlying legibility.*

61 *The historical vegetation of the receiving environment and the site, with reference to the Black Maps (1856), indicate appropriate native species to replace the densely vegetated riparian margins, which consist mainly of exotic willow trees. Sites of Ecological Significance are also identified on the CDP planning maps associated with the Pūharakekenui-Styx River (ID LP/23). The ecological report [2] references discrete wetlands within the site and which have potential to serve as areas targeted for restoration in the ODP.*

62 *The description of the receiving environment omits reference to the cultural significance of the area in particular the Ngā Wai overlay (ID95) and the relevance of the historical use of the area by maori despite proximity to Ouruhia and maori name of the Styx River as* Püharakekenui (Styx River). *The land was first settled by Urihia (sometimes called Uruhia), the son of the chief who founded Kaiapoi pā. During the 1879 Smith-Nairn Royal Commission of Inquiry into the Ngāi Tahu land claims, Taare Wi Teihoka and others from Ngāi Tūāhuriri recorded Ōuruhia as a kāinga mahinga kai where the wide range of foods gathered included tuna (eel), paraki (smelt), wahaoroa (horse mussel), inanga (whitebait), mata (juvenile whitebait), pātiki (flounder), aua yellow-eyed mullet), panako, Kōkopu (native trout),*

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pipiki (fish), pūtakitaki (paradise duck), pārera (grey duck), raipo (New Zealand scallop), tataa brown teal), totokipio (New Zealand dabchick), tutu, poro ("Māori turnip"), aruhe (bracken fernroot) and kōrari (the flower stalk of harakeke).

63 *Te Ngāi Tūāhuriri Rūnanga hold manawhenua over this takiwā. The cultural report[3] recommends PPC23 to be undertaken in accordance with Ngāi Tahu Subdivision and Development Guidelines to recognise opportunities to enhance cultural values inherent within the site. I consider this is also relevant to landscape values and support this recommendation.*

64 *Information contained within the CDP includes the hazard overlay maps, which identify the site as within a fixed minimum Floor Level Overlay with Flood Management Area; a Liquefaction Management Area, and parts of the site within a Flood Ponding Management Area.*

65 *The existing site access points including the four 4ha lots at the corner of Spencerville and Turners roads, Teapes Road and the bridge to Lower Styx Road are not described. There are five vehicle access points off Spencerville Road, three off Turners Road, two off the southern end of Teapes Road, and one off Lower Styx Road via the existing bridge from the portion of land that is located on the true right of the Pūharakekenui-Styx River. The existing site access points should inform opportunities for connection, and recreation.*

66 *The landscape character is largely derived from the surrounding CDP zoning that includes. RuUFZ, RuWZ, and OWMZ. This, in combination with the landform has driven the current development pattern and visual outcome particularly visible from the roads surrounding the site. Of key relevance is the building setbacks, dwelling typologies and vegetated road frontages along Spencerville, Turners and Lower Styx roads.*

67 *The most critical omission by the LVIA is a description of the outcome anticipated by the Specific Golf Resort Zone (SPRZ) with reference to the ODP including:*

67.1 *Built form providing at a maximum 150 residential units, 160 bed student dormitory, 380 resort bedrooms, food and*

[3] Mahaanui Kurataiao Ltd. Cultural report. January 2021

beverage outlets and retail outlets up to 8m in height) being concentrated in four clusters along a sinuous line across the upper terrace. The key buildings are identified as the Academy, Clubhouse and associated car park located within the southern corner of the Site accessed from Teapes Road – a no exit road. Vehicular circulation through the site appears to be one way with the site egress shown to be located along the northern boundary of the SPRZ and across the bridge to Lower Styx Road. Provision is made for a bridle path and pedestrian / cycle routes round the periphery of the site.

67.2 *The golf course will appear as a highly managed landscape comprising manicured greens, amenity trees and shrubs, with varied topography featuring manicured turfgrass with distinct zones of grass length (greens, fairways, rough) and strategic hazards including water features, sand bunkers etc. Rural activities and ecological restoration are provided for.*

67.3 *Boundary planting is shown around all boundaries of the SPRZ including the rural zone internal boundaries except where existing planting exists and will be retained. Of note is the existing residential property at 240 Spencerville Road, which is also retained under the SPRZ Zone*

68 *The character of the site as anticipated by the SPRZ will result in a parkland dominated by open space with clusters of / discrete nodes of habitation and facilities, noting that the four 4ha lifestyle properties remain outside the site at the corner of Turners and Spencerville Roads. The generous 100m building setbacks from the surrounding roads will maintain an open space, rural character noting that the combination of intended boundary planting and the 4ha lifestyle properties will afford screening of the centralised clusters of Resort Community buildings. This is the permitted baseline that PPC23 must be assessed against.*

Identification of Landscape Values

69 The landscape values of the receiving environment are broadly identified in terms of a peri-urban context, low development density and open space, natural features, flat topography with wide views over agricultural dominated landscape. Recreational opportunities

are mentioned as provided by Bottle Lake Forest, Golf Courses, Spencer Beach and Brooklands Lagoon.

70 The site values are described under the headings Physical, Perceptual and Associative. The physical values reiterate the description of the landscape rather than identify values derived from attributes. Visual amenity is the key value mentioned under the Perceptual values heading relating to lack of development, quiet, peaceful, background noises and smells of a productive working landscape. Associative values are noted as arising from the longstanding agricultural use, a sense of space and connection to the land and natural processes. No recreational opportunities are mentioned.

71 **Comment:** *The values of the receiving environment and the site are superficial and demonstrate a lack of understanding of the relationship between attributes and values. The values are inter-related and correct identification of the pertinent values are key to evaluating landscape effects. I add values I consider to be of key relevance below. While the omission of these values is of concern and doesn't align with best practise it does not impact on my ability to draw rational conclusions and recommendations.*

72 *CDP, Appendix 9.2.9.1.3a. significant features, offers guidance on values of the broader landscape specifically:*

72.1 *ii. Styx River / Pūharakekenui:*

A. The Styx River / Pūharakekenui is a spring-fed lowland river being an older meander of the Waimakariri.

B. Its sections of native vegetation and presence of wildlife it contributes to the amenity of the adjoining residential areas.

C. Cultural significance to Ngāi Tahu, particularly relating to mahinga kai and kāinga (settlements). The Pūharakekenui Māori Reserve fronts the river towards its mouth.

iii. Styx Mill Reserve:

A. An important representative area of the former Styx River floodplain and wetlands.

B. Has large areas of indigenous planting and ecological restoration.

C. Associated with an area of importance to Ngāi Tahu in relation to mahinga kai.

D. An area with important historic heritage connected to European settlement and mill industries.

E. An important wildlife refuge.

73 *In general, the physical aspects of the site including the formation of the land, hydrology and terrace typography of the site convey the potential wetland values affording habitats and biodiversity. Perceptual values include a high legibility (being the expression of land formation), transient values linked to wildlife habitat and seasonal variations, with high scenic values afforded by the semi-rural character and the Pūharakekenui-Styx River. The Pūharakekenui-Styx River is a memorable feature experienced from Marshlands Road intersection and while traversing Spencerville Road. Associative values include cultural associations with the natural resources connected to the Pūharakekenui-Styx River as an important mahinga kai site, presence of indigenous flora and fauna, and a cultural landscape, which are taonga to manawhenua.*

74 *In addition, values associated with the SPR golf course should be identified including maintaining an open space character, rural amenity albeit manicured and contrived but not urban.*

Identification and Assessment Against the Statutory Provisions

75 The LVIA determines that the relevant statutory context consists of the SPRZ and Residential Chapters plus the OWMZ of the CDP. It takes into account the potential restoration of the Pūharakekenui-Styx River corridor and development of the Lower Styx flood Zone into an open green space and wetlands assesses PPC23 against the relevant statutory context.

76 Chapter 13 Specific Purpose (Golf Resort) Zone (SPRZ). The response to Objective 13.9.2.1 acknowledges the differences between the proposed RNN and the SPRZ outcomes with a greater intensity of built form while retaining an open green space and wetland network.

Adverse effects on the adjoining rural environments are stated as mitigated by MM1 – MM4.

77 Policies 13.9.2.1.3 – 4 seek visual integration, careful siting and mitigation of effects. The LVIA response again relies on the mitigation measures including vegetation screening, setbacks, rural fencing and location of built form on the upper terrace.

78 **Comment;** *PPC23 will ensure open space is maintained by default due to the hazard overlays although it will be concentrated on the lower land between the RNNZ and the Pūharakekenui-Styx River rather than experienced from the adjoining rural character road boundaries. The riparian restoration is mentioned as a benefit although in my opinion this is overstated given the uncertainty around the extent of restoration that will actually occur. In reality, the difference will be the quality of open space, which under PPC23 will uphold a natural rural character rather than a contrived / managed landscape outcome.*

79 *The LVIA compares built form under the SPRZ with the RNNZ and concludes that the smaller scale will better fit the receiving environment but lacks commentary on the effects of the increased density and visual integration.*

80 *Critically, the LVIA response does not provide a quantifiable comparison between the SPRZ ODP where built form is sensitively located to address visual effects, set back over 100m, screened by existing development and mitigated by planting and that proposed by PPC23 ODP.*

81 *I examine this in more detail under my Landscape Assessment Discussion and Summary paragraphs 133 - 159.*

82 *Of key relevance is the absence of information relating to the hazard overlay and the necessary bulk earthworks to raise the level of the RNN Zone land to meet CDP standards. I point out that this would also be required for buildings in the SPRZ Zone. Either way, this will increase visual effects and impact on the character of the site.*

83 *I am not satisfied that the adverse effects on the adjoining RuUFZ have been adequately assessed with reference to the amount of earthworks necessary to achieve the flood levels and the mitigation*

measures proposed by PPC23. Related to this is my recommendation for DC-M to provide further assessment on the visual effects arising from development on raised ground levels in evidence.

84 Chapter 14 Residential. The LVIA assesses PPC23 against relevant objectives and policies in Chapter 14 Residential New Neighbourhood Zone, which focus on high quality, well-functioning residential neighbourhoods including amenity, integration and connectivity with surrounding areas.

85 The LVIA response mostly relies on the creation of an extensive green space and wetland area to achieve the outcomes to the objective and policies.

86 **Comment:** *I do not agree with the LVIA assessment against the Chapter 14 objectives and policies for the following reasons. The LVIA response to Policy 14.2.5.4-Neighbourhood quality and design, relies on the scheme plan (refer GA, page 17) rather than the ODP, as a means of achieving the outcomes. The scheme plan demonstrates that a logical roading and lot layout will be possible, but it reads very much as a standard subdivision. I note that the ODP provides for a roading layout that will enable a variety of lot sizes and diversity of housing types while retaining the ability to meet the required density to 15h/h.*

87 *I query whether the location of the commercial centre will be central to the development and or well connected to the Spencerville settlement. Similarly, the neighbourhood parks are shown on the periphery of the urban development, rather than providing internal integration into the development that offers choice and variability in outlooks and amenity. These matters also relate to Urban Design (UD) outcomes and I defer to the evidence of Ms Schröder with respect to achieving these.*

88 *The ODP must ensure the PPC23 contributes to a strong 'sense of place' under Neighbourhood quality and design, and the protection and enhancement of sites, value and other taonga of significance to tangata whenua. However, the LVIA does not contemplate how PPC23 will address cultural values, in particular with reference to Chapter 9 Natural and Cultural Heritage objectives and policies or identify any need to adhere to the Ngāi Tahu Subdivision and*

Development Guidelines. In my view, the lack of consideration of cultural values is missing from the LVIA with respect to achieving these policies.

89 *The LVIA states that amenity is realised through the provision of large green space and close association with the Pūharakekenui-Styx River, integration of planting and natural systems.*

90 *In my opinion the LVIA response focuses on and overstates the function of the green space, which is already existing as RuUFZ with a hazard overlay and likely to remain as pasture rather than a restored wetland with ecological features and values. I consider it more appropriate to focus on the internal stormwater treatment areas that will function as areas for passive recreation and the restoration of the Spencerville Drain in providing an enhanced natural character, ecological habitat and amenity across the site, integrated with wider recreational connections across and beyond the site.*

91 *My key concern is the ability of PPC23 to address the integration of the RNNZ development with the surrounding RuUFZ in response to 14.2.5.6.b., which seeks to 'ensure that the boundaries between new and existing developments are, where appropriate, managed to avoid or mitigate adverse effects.' This has been alleviated to a degree by the location of large lots around the periphery of the site that are internally accessed. I understand these larger lots to be 600 – 700m^2 in size, which in my opinion is not large enough to achieve integration with the RuUFZ, or maintain a rural character to the adjoining surrounding roads. I discuss this further below in paragraphs 133 - 159.*

92 Chapter 18 Open Space seeks the provision of open space, recreation opportunities, natural character, cultural values and biodiversity. The LVIA response points out that the PPC23 provides an incentive to develop an area that would otherwise remain as farmland or as a golf course. The LVIA recognises that PPC23 will afford recreational opportunities, meet health and well-being needs of the community. The response also mentions that PPC23 will enable greater public accessibility to the Pūharakekenui-Styx River and I agree this is a positive aspect to development under both the SPRZ Zone and PPC23 particularly in terms of amenity. The existing bridge is a feature of the site that contributes to landscape values particularly in relation to

the recreation opportunities so the ability of public access across the bridge is an important benefit to PPC23 and the wider community. That also provides the possibility for council to secure long-term protection for access within the catchment[4]

93 ***Comment****; I'm not clear on why the LVIA addresses Chapter 18, which applies to the OWMZ within the site. I understand this zoning does not change under PPC23. The key message provided by the LVIA response is the emphasis on the potential of PPC23 to enable a better outcome for natural open space and the riparian margin of the* Pūharakekenui-Styx River*. The better outcome envisages the enhancement of natural character and biodiversity, integration with wider recreational networks such as the Styx Source to Sea.*

94 ***Summary Comment on the Statutory Assessment****; I found the LVIA statutory assessment to be very repetitive, lacking analysis and justification.*

95 *Further I consider that for completeness the LVIA should address Chapter 9 Natural and Cultural Heritage at 9.2 objectives and policies relating to significant features, natural character and at 9.5 Ngai Tahu values and the natural environment.*

96 *I consider that without amendments, PP23 will not satisfy the CDP provisions relevant to landscape matters, particularly in regard to rural character and amenity and integration with the surrounding rural zones.*

Identification and Assessment of Landscape Effects

97 The LVIA provides a broad discussion of the effects arising from PPC23 although it is presented more as a description rather than tied to the landscape values per se.

98 The key landscape changes are stated as a shift from open agricultural/semi-rural paddocks over the northern terrace to a denser, compartmentalised residential neighbourhood with associated roads, services and a small commercial node. The conversion of the flood-prone lower southern terrace to extensive wetlands, native planting and accessible green space; and riparian

[4] CCC-Opus International Cons Ltd. 2017. Pūharakekenui / Styx river Catchment. Tauākī Wai Pātua / vision and Values

restoration along the Pūharakekenui-Styx River. The LVIA comments that the topography will remain essentially unchanged; vegetation transitions from predominantly exotic (pasture, willows) to increased native wetland and riparian species in restored areas.

99 The effects were assessed on the physical, perceptual, associative values and described as:
- Physical: there will be increased density of built form in the north; substantial native habitat creation in the south. Overall the site will maintain a degree of openness due to the retained wetland area and boundary planting.
- Perceptual: the northern area will become more active/urban in character, while the southern area will remain quieter and naturalised offering improved visual amenity.
- Associative: the site will gain a new residential/community identity while strengthening ecological and recreational associations including walking/cycling, and river access.

100 Temporary & cumulative effects were acknowledged by the LVIA and described as:
-temporary construction effects were expected in the short-term with benefits increasing as planting matures.
- with reference to the proximity to Spencerville and the potential river restoration work cumulative effects were assessed as positive for biodiversity and recreation.

101 The LVIA concluded that with recommended mitigation and alignment to the indicative ODP, effects on landscape character and values are assessed as **low** and visual amenity effects range from **very low to low** taking the mitigation measures into account.

102 **Comment;** *I am not convinced that the rationale provided by the LVIA assessment of landscape effects is adequate and consider it demonstrates a lack of analysis and understanding of the inter-relationship between attributes and values. This is indicated by the lack of integration of the visual assessment into the landscape assessment and therefore understates effects particularly on perceptual values relating to rural character and rural amenity. Visual effects are integral to an assessment of effects on perceptual values.*

103 *In my opinion the adverse effects on landscape values relating to rural character and amenity values[5] associated with the development enabled by PPC23 would be high to* ***moderate- high,*** *incorporating my conclusion on the visual assessment below.*

104 *However, in terms of other landscape values relating to natural character, the adverse effects are likely to be* ***low****.*

105 *Overall, this indicates that the rezoning is not appropriate and should be* ***declined*** *unless my recommendations for further mitigation to reduce effects is agreed upon.*

106 *My opinion is based on the following concerns relating to the landscape assessment. The LVIA states the site is not located within any landscape character, cultural or historic overlays and reflects a semi-rural character. This statement ignores the Pūharakekenui-Styx River as a Significant Feature (SF3.0) under the CDP with a Ngā Wai overlay. The hazard overlay is not recognised as a matter of national importance with implications for alterations to ground levels required to enable development. I find these omissions to be an issue especially in terms of addressing effects on natural character and cultural values.*

107 *Further comments in the LVIA centre around the substantial change that will occur under PPC23 but found as not necessarily adverse if weighed against the permitted baseline and anticipated effects arising from the SPRZ Zone. No detailed description of what these effects could be was provided. The LVIA undertakes a density comparison and concludes that PPC23 will result in double the density, albeit over a greater area while the SPRZ Zone will enable an equivalent of approximately 400 households. I agree.*

108 *The LVIA discusses the different building setbacks being a reduction of 90m and dismisses this in light of the potential scale of the building types anticipated by the SPRZ.*

109 *I consider the key issues relating to adverse effects on landscape values arising between SPRZ Zone and PPC23 will be the density of development, change in rural character with reduced open space,*

[5] CDP. Chapter 17-Rural. 17.2.2.3 Policy – Contributing elements to rural character and amenity values

particularly along the adjoining road boundaries and integration with the surrounding RuUFZ.

110 *The LVIA states that the scale of change will alter the perception of that area as a small urban centre but within the wider large-scale landscape will still be considered a small semi-rural settlement. I find this unsupportable given the proposed density of development that must be achieved at 15 households / ha and with reference to the built standards required in a RNN Zone essentially removing rural character.*

111 *The LVIA relies on the proposed mitigation measures to achieve the level of integration and mitigate adverse effects on the RuUFZ and RuW zones. The LVIA states that a setback greater than 10m is not considered to provide any advantage. While it may not offer an advantage internally it will certainly affect the outlook from the surrounding RuUFZ where open space dominated by vegetation is a key landscape value. The low degree of effect is not well supported by a description of the varying character of the surrounding roads or reference to the RuUFZ Zone standards, hence there is no baseline for an informed assessment of effects on the adjoining RuUFZ Zone. i.e. measured setbacks of existing dwellings, boundary vegetation types etc.*

112 *The LVIA comments on the positive aspects of PPC23 as retention of natural features and the opportunity for restoration, support of indigenous biodiversity, open green space with wetlands and native planting. Although I agree, I consider that much of this is a 'potential' benefit that would also occur under the existing SPRZ Zone and as a result of the hazard overlay given that the low-lying pastoral land will likely remain and continue to be managed by grazing. I consider that natural character will remain evident especially where natural processes such as flooding will be accommodated by the pastoral low land and the Pūharakekenui-Styx River will either remain or be enhanced through planting of riparian margins.*

Identification and Assessment of Landscape Effects - Visual Amenity

113 The LVIA provides a visual assessment separately to the landscape effects section noting that it is a subset to landscape effects.

114 A total of eight viewpoints have been considered around the periphery of the site where views into the site are possible. All viewpoints are within 230m of the site and the visual receptors are identified including the closest neighbouring properties. No viewpoint was considered from Teapes Road.

115 Overall visual effects were assessed as ranging between **very low** to **moderate** without mitigation and **very low to low** providing mitigation measures are in place.

116 **Comment**; *I do not agree with the conclusions of the LVIA visual assessment and consider that it requires updating. The key omissions are:*

- *The lack of comparison between the visual effects arising from SPRZ and PPC23, which forms the basis for determining effects on landscape values and whether or not the CDP provisions can be met.*
- *The elevated ground level required to meet flood levels is not taken into account.*
- *The time frames for the establishment of mitigation have not been considered.*

117 *The visual assessment is not well integrated into the consideration of landscape effects where it should inform perceptual effects. Instead, the visual assessment focuses on visibility rather than visual effects on landscape values, which should be based on the possible changes anticipated by the permitted baseline of the SPRZ, notwithstanding the current rural amenity encompassing open green space, dominance of vegetation, lack or low density of built form, quiet, visual cohesion, quiet, presence of farming activity, and natural character pertaining to the receiving environment being the adjoining RuUFZ and OWMZ.*

118 *The LVIZ bases the visibility of development enabled by PPC23 on the 5m wide mitigation planting maintained at 5m height, rural style fencing, 10m building setback to Spencerville and Turners roads as mitigating visual effects with the intention of partial screening. The actual degree of screening must take into account the maximum building height of 8m, and the species growth rates. There is no*

consideration of the 400mm ground level rise for buildings. In reality, the medium density urban environment will dominate the view from the immediate surroundings in the short term at least for five years until the vegetation establishes.

119 *The LVIA visual assessment relating to viewpoints 1 - 4 relies on the existing willow trees lining the Pūharakekenui-Styx River providing screening along the Lower Styx Road, although there is acknowledgement that these may be removed during riparian restoration. In this event, distance and additional native plantings were considered to alleviate adverse visual effects. I note the closest urban development edge will be within 250m from Lower Styx Road, comprising an Academy or Academy Clubhouse under the SPRZ Zone or residential development under PPC23. No comment on the deciduous nature of these trees was taken into account, nor the ground level changes to built form, albeit located in the distance. However, I agree that visual effects from Lower Styx Road will likely be* ***very low*** *and more likely* ***no*** *visual effect due to the level of existing screening afforded by the willow trees and riparian vegetation, and with reference to the Concept Masterplan and the naturalisation of Spencerville Drain and stormwater treatment areas affording layered lines of visual screening to the residential development.*

120 *Viewpoint 5 is best represented by Photograph A (refer GA, Page 19) that shows development beyond the Prestons Wetland foreground. I consider views of this nature to be realistic from a short section of Spencerville Road under SPRZ if PPC23 is approved. Accordingly, I consider that comparatively speaking from Viewpoint 5 adverse visual effects will be* ***moderate*** *in the short term and will reduce to* ***low****, as planting establishes to afford screening, notwithstanding that amenity of a different sort would replace the current rural amenity.*

121 *I query the reason behind combining viewpoints 5 and 6. Both of these views are located on Spencerville Road and experienced by Spencerville residents. In reality, these views are quite different in terms of view distances, which are at 230m and 20m, and the respective openness of the view. Viewpoint 5 represents the 600m stretch of road between the bridge to Spencerville and the site boundary, whereas Viewpoint 6 is taken at the entrance to 247*

Spencerville Road and from where the site is completely obscured by boundary planting.

122 *I am not clear why Viewpoint 6 was chosen as a key viewpoint unless it was to demonstrate the retention of the dwelling and existing established exotic trees along the road boundary under SPRZ Zone. Under PPC23 the retention of the dwelling at 247 is not contemplated by the ODP although retention of the established boundary trees is envisaged. Under both SPRZ and PPC23 the internal access road will be visible. However, the built form within SPRZ will be well set back 100 m, partly obscured by the existing boundary planting and dwellings at 247 and partly affording an open space frontage with views to the Port Hills likely maintained. In comparison under PPC23 residential development will be elevated and within 10m of the road boundary. Accordingly, Viewpoint 6 indicates that adverse visual effects arising from PPC23 will be* ***high,*** *with potential to reduce to* ***moderate-high*** *if sufficient roadside boundary trees were retained.*

123 *A better viewpoint location would be at the boundary to 255 Spencerville Road, which affords open views across the pastoral frontage of the site to the distant Port Hills. At this viewpoint location (Viewpoint 6b) the SPRZ development would be set back beyond an open space frontage, while PPC23 will remove the open pastoral outlook. Under both zones views would overlook the Spencerville Road entrance into the site. The LVIA visual assessment did not provide comment on the visual effects experienced by the owner of 247 Spencerville Road although the exit views from their driveway will change and look directly into PPC23. In my assessment the visual effects would be* ***high****.*

124 *At Viewpoint 6b PPC23 will result in views of the elevated larger lots around the periphery of the site, with dwellings prominently visible at up to 8m in height, setback 10m and only partly screened by planting. Views to the distant Port Hills would be removed and visual effects would be* ***high*** *at least in the short-term reducing to* ***moderate-high*** *post planting at 5 years.*

125 *Viewpoint 7 will not change under the SPRZ Zone and will continue to provide views over the development enabled by RuUFZ Zone. Under PPC23 the view will change from RuUFZ to the increased density of urban development where views of residential dwellings will be*

*prominently visible at up to 8m in height on elevated ground partly screened after 5 plus years by native planting and rural style fencing. Adverse visual effects will be **high** with the change in landscape character and rural amenity evident.*

126 *At Viewpoint 8, under the SPRZ the resort community development will be visible at a distance of 100m up to a maximum of 8m in height beyond an open space / golf course frontage, which is likely to include some planting. In comparison PPC23 will afford views of residential dwellings will be prominently visible at up to 8m in height on elevated ground partly screened after 5 plus years by native planting and rural style fencing. Adverse visual effects will be **high** with the change in landscape character and rural amenity evident.*

127 *In my opinion the visual effects on landscape values arising from PPC23 at:*

*Viewpoints 1 – 4 will range between **no to very low**.*

*Viewpoint 5 - **moderate** reducing to **low** as vegetation establishes*

*Viewpoint 6 – **high** reducing to **moderate-high** if established roadside vegetation is retained*

*Viewpoint 6b – **high** reducing to **moderate-high** as vegetation establishes*

*Viewpoint 7 –**high***

*Viewpoint 8 –**high***

Table 1. Comparison between SPRZ and PPC23 Visual Effects

Viewpt	Viewer	View	Type of view - amenity	Magnitude of visual effect – without amended mitigation
1 – PPC23	Lower Styx Rd 137, 143 Lower Styx Rd	106m	Rural picturesque outlook	**No** visual effect

1 - SPRZ	Lower Styx Rd 137, 143 Lower Styx Rd	106m	Rural picturesque outlook	No view to SPRZ
2 -PPC23	Lower Styx Rd 206, 218, 224, 228, 234 Lower Styx Rd	120m	Rural picturesque outlook	**No** visual effect
2 - SPRZ	Lower Styx Rd 206, 218, 224, 228, 234 Lower Styx Rd	120m	Rural picturesque outlook	No view to SPRZ
3 - PPC23	Lower Styx Rd Spencerville	120m	Rural outlook enclosed by willows and pine plantation	**No** visual effect
3 - SPRZ	Lower Styx Rd Spencerville		Rural outlook enclosed by willows and pine plantation	No view to SPRZ
4 - PPC23	Lower Styx Rd Spencerville	65m	High amenity from urban edge Intermittent screening with view gaps	**Very low – low**. Views of dwellings will be visible with no vegetation screening
4 - SPRZ	Lower Styx Rd Spencerville		High amenity from urban edge. Intermittent screening with view gaps	Resort community screened by boundary planting on ODP
5- PPC23	Spencerville Rd 287 Spencerville Rd	230m	Rural outlook over pastures, shelterbelts, rural dwellings, to distant Port Hills	**Moderate** with views of dwellings along terrace edge with pastoral frontage and views to PHs maintained
5 - SPRZ	Spencerville Rd 287 Spencerville Rd		Rural outlook over pastures, shelterbelts, rural dwellings, to distant Port Hills	Resort community mostly screened by retention of 224 Spencerville Rd and vegetation screening on ODP
6 - PPC23	Spencerville Rd 247, 250 Spencerville Rd	20m	Established exotic amenity trees bounding Spencerville Road. Resort community up to 8m height set back 100m beyond established trees and vegetation screening on ODP	**High** - Prominent views to PPC23 dwellings setback 10m with partial vege screen up to 5m
6 - SPRZ	Spencerville Rd 247, 250 Spencerville Rd	20m	Established exotic amenity trees bounding Spencerville Road. Resort community up to 8m height set back 100m beyond established trees and vegetation screening on ODP	Semi-rural amenity retained
7 - PPC23	Cnr Spencerville – Turners Rds 157, 209 Spencerville Rd 163,175,185 Turners Rd	17m	Cnr a mix of open lawn / pasture, native vegetated frontage with	**High** – view replaced by urban form

			dwellings nestled amidst a mix of established shelter trees and exotic amenity trees	prominently visible at corner
7 - SPRZ		17m	Cnr a mix of open lawn / pasture, native vegetated frontage with dwellings nestled amidst a mix of established shelter trees and exotic amenity trees	Remains unchanged
8 - PPC23	Turners Rd / Teapes Rd 138, 143, 153 Turners Rd 18, 20 Teapes Rd	20m	Context of rural living at corner with rural outlook to shelterbelts, open pasture, farm buildings across the site. Under SPRZ onsite farm sheds at 56m setback replaced by golf course with resort community setback 100m beyond open frontage	**High** – large internal shelter trees removed, urban form – dwellings on elevated GL visible beyond 5m vegetated frontage and 10m setback extend along road frontage
8 - SPRZ	Turners Rd / Teapes Rd 138, 143, 153 Turners Rd 18, 20 Teapes Rd	20m	Context of rural living at corner with rural outlook to shelterbelts, open pasture, farm buildings across the site. Under SPRZ onsite farm sheds at 56m setback replaced by golf course with resort community setback 100m beyond open frontage	Semi-rural amenity retained

128 *Visual effects will be **high** along Turners and Spencerville Roads due to prominence of the residential development at the RuUFZ and RuW zone interface. These effects can be reduced by my recommended amendments to the ODP and Chapter 8 provisions.*

Effectiveness of Design and Mitigation Response

129 **Comment**; *I am not convinced by the LVIA argument that PPC23 is justified by the SPRZ Zone baseline because no visual assessment was undertaken as a comparison, including recognition of the retention of the existing dwelling at 240 Spencerville Road and the four 4ha RuUFZ Zone properties at the corner of Turners and Spencerville roads. In addition, the SPRZ Zone includes a suite of*

conditions and qualifying triggers such as a management plan and completion of planting to be met, which are absent from PPC23.

130 *The proposed mitigation measures are barely adequate in my view and will not address visual effects to the degree stated by the LVIA at least in the short term up to and beyond 5 years. Further the LVIA does not take into account the required changes to ground level in response to the flood hazards.*

131 *Refer to my evidence below, where I recommend larger lots (1000m^2) around the periphery of the site with a 20m building setback, increased internal setbacks and a reduced building height to 5m to address adverse effects on the surrounding RuUFZ, and that would potentially allow for further subdivision and integration if there is future development of the surrounding RuUFZ.*

Whether the LVIA Conclusions are credible and consistent with the analysis.

132 The LVIA concludes that effects on landscape character and values will be **low**, at the same time acknowledging that the current rural and semi-rural character will transform into an urban character. I question this conclusion. The adverse effects are rationalised by the permitted building form and development permitted by the SPRZ. Positive effects are considered to be afforded by the wetlands and open green space, restoration of the Styx River margin, ecological habitat and recreation opportunities. Visual amenity effects are considered to be **very low to low** taking the proposed mitigation measures into account.

133 **Comment**; *I consider the LVIA conclusion lacks a comprehensive analysis of the effects of PPC23 on the pertinent landscape values and is not underpinned by a considered visual assessment as per my comments above. In my opinion an updated visual assessment is required from DC-M that takes into account the visual effects arising from the increased ground levels, the effects anticipated by the SPRZ and consideration of the standards relating to the boundary lots to PPC23.*

LANDSCAPE ASSESSMENT DISCUSSION AND SUMMARY

134 PPC23 is essentially an isolated greenfield development as a RNNZ northeast of Christchurch City, approximately 2km north of the closest urban development at Prestons surrounded by the RuUFZ and 830m from the small settlement at Spencerville.

135 The LVIA justifies PPC23 by the permitted baseline development anticipated by the SPRZ. Although development is anticipated for the site, I am of the opinion that the SPRZ is a hybrid zone enabling golf and resort facilities with limited residential development, positioned at the urban-rural fringe. Based on my knowledge of other golf resort areas, such as Clearwater, these zones appear to function as a buffer between rural and urban areas rather than being strictly a rural or urban zone.

136 The SPRZ enables a maximum potential for 150 residential dwellings plus commercial / resort structures for the Whisper Creek site. Under the SPRZ, the 8m height limit suggests two-storey structures are likely and will potentially result in large footprint, bulky structures up to 8m, including a hotel, commercial outlets up to 1000m^2, retail at 500m^2, club rooms, a driving range and other golf facilities. However, the permitted activity is a maximum and would not necessarily be developed to that extent. The most relevant comparison is the low-rise luxury Clearwater Resort, which offers 73 rooms (guest rooms, suites and villas) mostly limited to 2 storey structures located around the golf course and Lake Kaikainui.

137 Under SPRZ the anticipated building bulk will be greater than individual dwellings resulting from PPC23 at the Whisper Creek site, but the difference is that effects on the adjoining RuUFZ are well addressed by the suite of standards in the SPRZ – the 100m building setback being only one of these. In terms of location, the SPRZ ODP indicates the potentially large bulky structures are well set back from surrounding roads with the Academy, Clubhouse and Driving Range tucked into the southern corner of the site, physically and visually separated from the surrounding roads and rural properties.

138 Overall, the SPRZ Zone would result in a contrived and manicured, albeit open landscape, dominated by vegetation with glimpses of built form set back over 100m and screened by vegetation, retention of a

residential property and the existing RuUFZ development at the corner of Spencerville and Turners roads. Visual effects would be limited to approximately 800m along Spencerville Road and 600m from Turners and Teapes roads.

139 In comparison, PPC23 will provide for up to 800 dwellings that will be visible for 2.4km to varying degrees along Teapes, Turners, and Spencerville roads. Therefore, PPC23 will not provide a buffer between rural and urban areas. Under the CDP definition, '*the Residential New Neighbourhood Zone generally includes new areas of greenfield land where large-scale residential development is planned. The Zone will allow a wide range of residential house types and section sizes to provide for a wide spectrum of household sizes and affordable housing. These areas are intended to achieve higher overall residential densities than traditionally achieved in suburban developments*.'[6]

140 I note that the spatial arrangement proposed by PPC23 is generally consistent with the outcomes sought in the operative SPRZ Zone ODP, which shows the lower terrace area and adjoining road boundaries as a golf course, with resort housing and facilities located on the upper terrace.

141 Under both the SPRZ and PPC23 road boundaries will be planted and access points are limited into the site. The difference is that the SPRZ ODP indicates that built form is clustered internally within the site to reduce effects on rural character, maximise open space particularly as experienced from the surrounding road network and neighbouring properties, and built form will be screened by the four approximately 4ha RuUFZ properties at the corner of Turners and Spencerville roads.

142 It is also likely that buildings within the SPRZ Zone would adhere to a theme and therefore provide some visual coherence that may not be so readily achievable through PPC23 subdivision under individual lot owners. Adverse visual effects could be further reduced by limiting materials to low reflectance value colours and recessive materials.

[6] CDP. Table 14.2.1.1a. RNNZ Description.

143 In my opinion, PPC23 will result in an urban subdivision, with kerb and channel road edges, mown berms, street lighting etc. The effects of street lighting has not been assessed but I consider will be an adverse effect on the surrounding rural environment during the night reducing rural and natural character and rural amenity.

144 The rural – urban interface to Turners and Spencerville roads is a key consideration acknowledging adverse effects on the adjoining RuUFZ and RuW zones. Given the natural hazard overlays, it is likely that any future development will occur to the west of the site rather than eastwards towards Spencerville. This means that these boundaries must also consider potential connection to future proposals or risk isolating and creating artificial barriers to integration.

145 My main concern is how the larger lots at 600 - 700m^2 around the western periphery of the site will work, firstly as an interface to a rural urban fringe and secondly with regard to potential future development pressure noting that a greater extent of rural urban fringe living is already accommodated in the area immediately west of the site.

146 In my opinion the setback of 10m for the larger lots along the road boundaries will simply not maintain a rural character or provide a suitable interface to the RuUFZ and RuWZ.

147 To be satisfied about the differences in outcomes on the surrounding rural character and amenity, effects anticipated under both the SPRZ and RNNZ need to compare the relevant Built Form Standards (building setbacks to both internal and road boundaries, building height, lot size, maximum building height of 8m) to ascertain whether visual integration can be achieved.

148 Due to the north and west orientation of lots to the existing surrounding roads internal lot access, dwellings on the peripheral lots are not likely to present their backs onto the surrounding roads and therefore will maintain outdoor living space and gardens as an outlook from the RuUFZ. However, in my opinion, despite lots between 600 – 700m2, the 5m boundary planting, the consistent 10m setback for 8m high dwellings will likely result in a wall of housing, meaning that residential development will dominate the outlook from the surrounding RuUFZ.

149 The GA, page 15 illustrates the boundary interface resulting from PPC23. I think this understates the actual effect which I demonstrate in Figure 1, Plan Views and Figure 2 Indicative Cross Sections below.

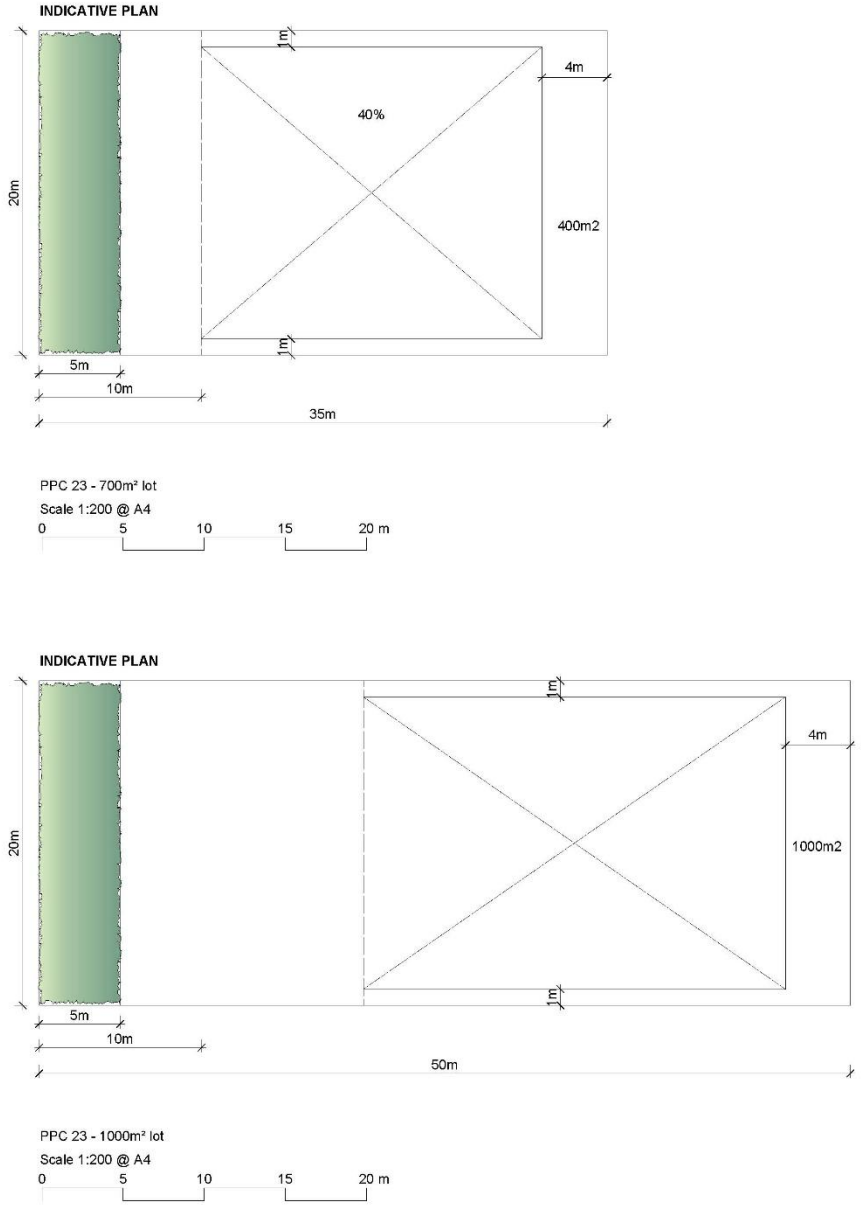


Figure 1. Plan Views - Comparison between 700m² and 1000m² boundary lots

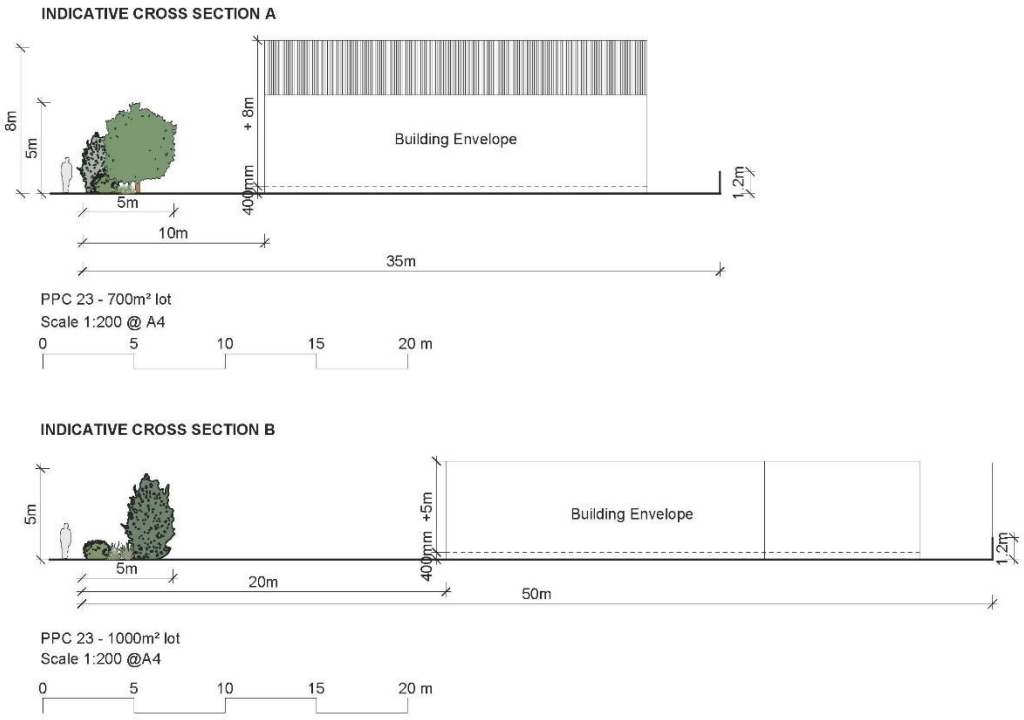


Figure 2. Indicative Cross Sections at Road Boundary Interface

150 Under the RuUFZ rules the minimum setback is 15m with minimum 4ha sites and site coverage dictating density outcomes.

151 However, a Google Earth measure of the setbacks of existing dwellings within the RuUFZ and RuWZ surrounding the site show that building setbacks range between 12m to over 100m with most dwellings screened by substantial planting (a mix of exotic and native species) and open space fronting the road boundaries. This is the context of the receiving environment.

152 Undoubtedly, the larger lots around the perimeter of the site, depending on their size, may affect the ability to realise the required density under the RNNZ, but will realise the policy[7] direction to ensure that development contributes to neighbourhoods that comprise a diversity of housing types. In my view this is partly driven by a diversity in lot size.

153 A 1000m^2 lot with dimensions of 20 x 50m could achieve a setback of 20m while providing for the maximum site coverage and

[7] CDP. Chapter 14 Residential.RNNZ Policy 14.2.5.4

setbacks. To further mitigate visual effects, I defer to Ms Shröder's recommendation to increase the minimum building setback from internal boundaries under the RNNZ rules from 1m to 3m. This will result in a minimum 6m gap between dwellings along the road frontages of the site allowing a visual gap and variable depth of view into the site.

154 A 1000m^2 lot with a 20m building setback will also provide some flexibility for future subdivision to create a 400m^2 lot accessible from the surrounding Spencerville and Turners roads, if development of the surrounding RuUFZ occurs, to maintain connectivity and integration. I note that while the larger lots around the perimeter of the site may address the rural urban interface, they may also affect the ability to realise the required density under the RNNZ.

155 Given this, I recommend that 60% of the larger lots are configured as 1000m^2 lots fronting Spencerville and Turners roads and the building setback from the road frontage is increased to at least 20m, the minimum building setback from internal boundaries under the RNNZ rules from 1m to 3m and the maximum building height is reduced to 5m. In my opinion, this will better align with the existing semi-rural context, introduce some variability to built form and reduce effects on rural character and amenity to **low-moderate**.

156 An appropriate rural-urban interface and amenity could also be enhanced by the retention of existing established trees depending on the suitability of the species. Internal features and tree clusters are likely to be removed by earthworks to raise ground levels over the upper terrace but existing trees along the road boundaries may be retained. I suggest a description of existing trees and an identification of what could be retained along the road frontages, particularly in relation to 240 Spencerville Road, the boundary planting along the 4ha lots and established trees along Turners Road be identified on the ODP.

157 Similarly adverse effects on natural character will vary from **high** in relation to the urban development to **low** if as I understand is intended indigenous planting is established around stormwater retention areas, the Spencerville Drain is naturalised and riparian margins of the Pūharakekenui-Styx River are enhanced. This along with the ability for the public to access the true left of the

Pūharakekenui-Styx River on what was previously privately owned land affords a high level of benefit, exposing areas of high natural character and elevating the presence of the Pūharakekenui-Styx River. In my opinion the increased experience of natural character will align with the vison and values identified for the Pūharakekenui-Styx River catchment.

158 The recreational opportunities provided are also mentioned as a positive outcome. I agree. The LVIA concludes that the accessibility and ecologically rich environment will promote a greater sense of ownership, responsibility and responsiveness to the natural environment. I do not consider this to be plausible but agree the experience of natural wetlands and spring fed river may prompt an appreciation of the overall Pūharakekenui-Styx River catchment along the Source to Sea, with natural processes contributing to a high natural character and cultural concepts of mauri. PPC23 will enable the mauri of the Pūharakekenui-Styx River to be respected and it is assumed that the enhancement of the riparian margins with indigenous species and the resulting increase in biodiversity will accord with tangata whenua values.

159 Of concern is the extent to which the upper terrace residential development could impact on the landscape values (natural character, visual amenity, ecological biodiversity etc) attributed to the Pūharakekenui / Styx River. In reality the residential development will be on an elevated terrace and separated physically by the stormwater treatment areas and restored Spencerville Drain at distances between 180m – 600m from the riparian margin of the Pūharakekenui – Styx River.

160 While the Pūharakekenui / Styx River and flood prone land may be seen as a barrier to development, notwithstanding the retention of pastoral land in the short term, it will afford a high amenity to the site creating a unique sense of place associated with opportunity for extensive wetlands, retention of stormwater and wider connections to cultural values and Source to Sea experience.

SUBMISSIONS

161 A total of 74 submissions were received on PPC23. Of these 8 were in support, 5 were neutral and 61 oppose PPC23. The concerns raised by submitters relating to landscape included the following:

- Effects on rural residential character - country lifestyle, noise and traffic and lighting
- Effects on rural amenity, rural outlook, loss of green space
- Effects on cultural values

162 My discussion above sets out a number of recommendations that address the alternative relief if the rezoning is approved sought by R Watson (4.2), S Coombe (25.8), K and A Buxton (71.1) and J Messerly (75.1). In relation to the rural residential character, rural amenity, loss of green space, I consider that effects are better addressed by a percentage of larger lots along Turners and Spencerville road boundaries that include a reduced building height and an increased building setback.

163 The riparian restoration and reserve areas will contain a substantial amount of native planting that I believe will address the preservation of natural values that submitter A Hick states at 46.1 and 46.2 and the retention of the low-lying pastoral land would at least maintain approximately half the site as green space.

164 I agree that effects on cultural values have not been addressed adequately by the LVIA. I am aware however that cultural values have been considered by the cultural report, which recommends that development enabled by PPC23 adheres to the Ngāi Tahu Subdivision Development and Guidelines.

EVIDENCE CONCLUSION

165 In conclusion, while the proposed PPC23 has the potential to enable a comprehensively planned residential neighbourhood with associated open space and ecological enhancements, I am not satisfied that the LVIA provides a sufficiently robust or reliable basis to support the conclusions reached.

166 The LVIA is affected by methodological inconsistencies, insufficient application of assessment principles, and a lack of integration between landscape character and visual amenity considerations. In particular, there is an absence of a meaningful comparison with the permitted baseline established by the SPRZ, which limits the ability to appropriately evaluate the scale and nature of change.

167 The description of the proposal and receiving environment lacks the necessary depth and specificity to accurately identify landscape values and assess effects. As a result, the LVIA tends to overstate potential benefits—particularly in relation to ecological restoration and open space outcomes—while understating the extent of adverse effects, especially on rural character and amenity values.

168 In my opinion, as notified, the development enabled by PPC23 would result in **moderate to high adverse effects on landscape values associated with rural character and amenity**, particularly at the interface with the surrounding RuUFZ. These effects arise from the increased density of built form, reduced setbacks, and the prominence of residential development within an existing open, semi-rural landscape context. While adverse effects on natural character are likely to be lower, this is contingent on the implementation of ecological restoration measures that are currently uncertain and not well secured.

169 I consider that the proposed mitigation measures are insufficient, particularly in the short to medium term, and do not adequately address the visual and landscape effects arising from the scale and intensity of development anticipated. Additional controls—such as increased building setbacks, stronger interface treatments, and more certain and detailed landscape provisions—are necessary to achieve better integration with the surrounding environment.

170 Overall, while the ODP provides a framework capable of accommodating development, further refinement is required to ensure that it can deliver outcomes that are consistent with the objectives and policies of the CDP, particularly in relation to landscape character, amenity, and integration with the surrounding rural environment.

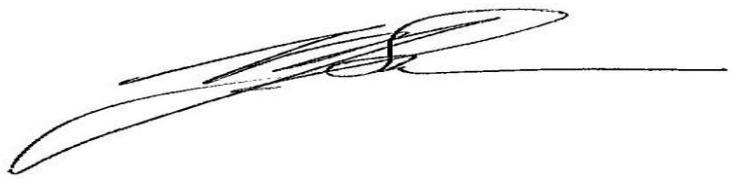
171 Appropriate refinements are:

- To ensure 60% of the peripheral lots fronting and including at the corner of Spencerville and Turners roads are increased to 1000m^2.
- A change to the rules to require a 20m building setback from Spencerville and Turners roads, and an increase from 1m to 3m for internal boundary setbacks for all lots adjoining Spencerville and Turners roads, with internal access from the site.
- In addition, further consideration of the ground level changes and effects on visual amenity are required.
- Confirmation that the Ngāi Tahu Subdivision Guidelines will form part of the statutory provisions.

172 These changes would be sufficient to amend my conclusion that **moderate** to **high** effects will reduce to **low** to **moderate**.

173 Accordingly, I recommend that amendments are made to the ODP and associated provisions to address the landscape effects identified in my evidence, prior to any approval of PPC23.

Dated: 15 April 2026



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Nicola (Nikki) Smetham

APPENDIX 8 - REVIEW OF PPC23 AND SUBMISSIONS RELATED TO WATER AND WASTEWATER MATTERS BY MICHELE MCDONALD, TEAM LEADER: ASSET PLANNING – WATER AND WASTEWATER TEAM AT COUNCIL

BEFORE INDEPENDENT HEARING COMMISSIONERS
IN CHRISTCHURCH

TE MAHERE Ā-ROHE I TŪTOHUA MŌ TE TĀONE O ŌTAUTAHI

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the hearing of submissions on Private Plan Change 23 Whisper Creek, Spencerville to the Christchurch District Plan

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STATEMENT OF PRIMARY EVIDENCE OF MICHELE ANN MCDONALD ON BEHALF OF CHRISTCHURCH CITY COUNCIL

Dated: 23 March 2026

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EXECUTIVE SUMMARY

1. My full name is **Michele Ann McDonald**. I am employed as Team Leader – Asset Planning Water and Wastewater at Christchurch City Council.

2. I have prepared this statement of evidence on behalf of the Christchurch City Council (the **Council**) in respect of my input into, and matters arising from the submissions and further submissions on Private Plan Change 23 – Whisper Creek to the Christchurch District Plan (**PPC23**).

3. The proposed plan change area is not serviced by Council water supply or wastewater networks, and the existing water supply and wastewater networks do not have capacity to service future development enabled by PPC23.

4. In my opinion, future development within the proposed plan change area can be serviced by developing new treated water sources, associated water supply and wastewater networks, and targeted wastewater upgrades. The vesting of all new infrastructure would be subject to compliance with Council standards and minimum requirements, while the vesting of individual on-site local pressure sewer units would be at Council's discretion through future consenting processes.

5. Matters raised through submissions do not alter Council's advice or requirements that underpin the technical assessment supporting PPC23.

INTRODUCTION

6. My full name is **Michele Ann McDonald**. I am the Team Leader: Asset Planning – Water and Wastewater at Christchurch City Council (Council). In this role, I have provided technical advice on the capacity of Council's water supply and wastewater networks, as well as the associated servicing requirements for the proposed Private Plan Change 23 – Whisper Creek (the application).

7. My involvement included calculating the residual water supply capacity available within the Brooklands–Kainga water supply zone, commissioning a pump test for the Heyders Pumpstation (PS78), and specifying the requirements for wastewater network modelling that was undertaken by Council's consultants to support the applicant's technical assessment.

8. In preparing this evidence I have reviewed the following documents:

   8.1 Request for Change to the Christchurch District Plan to rezone land generally located at 240 Spencerville Road, Marshlands from a Specific Purpose (Golf Resort) Zone and Rural Urban Fringe Zone to a Residential New Neigbourhood Zone, Final (September 2025)

   8.2 Appendix B – Infrastructure Report, Whisper Creek – Proposed Subdivision, 19432 Rev 4 (May 2025)

   8.3 Wastewater Model Assessment – Plan Change Query – Whisper Creek (March 2025)

   8.4 Appendix K – Whisper Creek Plan Change – Christchurch District Plan Amendments

   8.5 The summary of Decisions and Submissions on the publicly notified plan change.

9. I am authorised to provide this evidence on behalf of the Council.

Qualifications and experience

10. I hold a four-year Bachelor of Science in Civil Engineering and a separate Bachelor of Science (Honours) in Urban Engineering, both awarded by the University of Pretoria, South Africa. Both qualifications are honours-level degrees and are aligned with NZQF Level 8 under the New Zealand Qualifications Framework.

11. I have over 30 years of experience as a civil engineer with particular focus on water supply and wastewater infrastructure planning and delivery. I have developed several water and wastewater infrastructure strategies for cities and major metropolitan areas and joined Christchurch City Council in January 2017 as a Senior Planning Engineer-Growth within the Asset Planning – Water and Wastewater team.

12. I am a registered professional engineer in South Africa and a Chartered Member of Engineering New Zealand.

Code of conduct

13. While this is a Council hearing, I have read the Code of Conduct for Expert Witnesses (contained in the 2023 Practice Note) and agree to comply with it. Except where I state I rely on the evidence of another person, I confirm that

the issues addressed in this statement of evidence are within my area of expertise, and I have not omitted to consider material facts known to me that might alter or detract from my expressed opinions.

Scope of evidence

14. My statement of evidence addresses the following matters:

    (a) Water Supply

    (b) Wastewater

    (c) Response to Submissions

    (d) Proposed Christchurch District Plan Amendments

15. I address each of these points in my evidence below.

WATER SUPPLY

16. The proposed plan change area is not serviced by a reticulated water supply. The nearest Council water supply system is the Brooklands-Kainga water supply zone, which is supplied by two single groundwater abstraction wells and associated treatment plants located on Kainga Road and on the north end of Lower Styx Road. The closest potential connection point to this water supply system is on Lower Styx Road, opposite Spencerville Road.

17. The Brooklands-Kainga water supply zone does not have sufficient capacity to service the level of future development that would be enabled by PPC23, which is proposed to comprise approximately 800 residential lots and a 3,000 m^2 commercial area.

18. The technical assessment supporting the application appropriately references the capacity advice provided by Council and acknowledges that development at the scale proposed for this plan change area will require new groundwater sources, an associated new water treatment plant, and a new water supply network. The additional water supply infrastructure must be appropriately sized to meet peak demand requirements as well as the applicable fire flow demand.

19. Additional water supply capacity is required because the Brooklands-Kainga water supply zone is relatively small and has limited residual capacity. This contrasts with larger water supply zones across the city, where residual water supply capacity is generally available.

20. The above is corroborated by Council advice provided in 2018, that the Brooklands–Kainga water supply zone could only support a rural restricted service for a limited residential development proposed as part of the Whisper Creek Golf Resort (70 residential lots). A rural restricted service operates at a significantly reduced flow rate that does not support firefighting and requires each property to provide on-site potable water storage as well dedicated on-site fire water storage.

21. I advised that the following Council minimum requirements will prevail for the development of additional water supply capacity for future development within this proposed plan change area:

    21.1 Groundwater abstraction must be sourced from Aquifer 3, 4 or 5. Council will not accept groundwater takes from Aquifers 1 or 2 due to the associated risks to drinking water safety and its impact on the city's drinking water supply security.

    21.2 The new water treatment plant must be connected to the Brooklands-Kainga water supply zone for operational efficiency and network integration.

    21.3 Standby power generation will be required to ensure the ongoing reliability of the water treatment plant.

22. As part of future development processes, sufficiently sized land will have to be set aside for the new groundwater abstraction and treatment plant to enable ease of access for maintenance and to allow Council to upgrade the facility should it be required, including the provision of a suction tank, if not provided as part of the development.

23. To manage compliance with Council standards, the future development of water supply infrastructure will require Council and the Developer to enter into an Infrastructure Provider Agreement to cover the design, construction, commissioning and asset handover of the facilities, including:

    (a) The Design Engineer must be approved on the Three Waters HDM (Hybrid Delivery Model) Professional Services Panel.

    (b) The design must comply with the standards and requirements in the Council Design Guides/Standards Master List, with Council advising of any additional specifications or requirements throughout each design phase.

(c) The applicant will be responsible for obtaining an ECAN consent for the additional water take, which must be vested in Council prior to commissioning.

(d) The applicant must complete all necessary investigations and assessments to adequately inform the design, including hydrogeology, water quality, geology, ground contamination, archaeological, ecological, and visual assessments.

(e) The design must be comprehensive and cover hydrogeology, civil, mechanical, structural, electrical, SCADA and controls, landscaping, access, security, and water safety disciplines.

(f) The design process must incorporate risk assessments (including water safety) and safety-in-design requirements.

(g) The applicant must obtain Council Engineering Acceptance for each design stage: Concept, Preliminary, and Detailed Design.

(h) All construction work must be undertaken by a Council-approved Three Waters HDM Potable Water Tier One Contractor.

(i) Council will participate in and review the Contract Quality Plan, Health and Safety Plan, Environmental Management Plan, Contract Method Statement, and Testing & Commissioning Plan, including the handover checklist.

(j) The Infrastructure Provider Agreement will specify any additional requirements for As-Builts, testing and commissioning, and Operations and Maintenance Manuals.

(k) Council will appoint an Engineer to oversee and coordinate Council's review and acceptance processes as part of the consenting, design, construction (including quality assurance), commissioning, and handover process.

24. The Consent Holder must undertake all design and construction at its sole cost and meet all reasonable CCC costs, including legal, external, and internal consultancy costs.

WASTEWATER

25. The proposed plan change area is not serviced by a reticulated wastewater network. The nearest Council wastewater network is the gravity sewer located in Lower Styx Road, which conveys wastewater to the downstream Heyders Pumpstation (PS78). From this pump station, wastewater is pumped through Bottle Lake Forest to the Parklands gravity wastewater network.

26. Wastewater network modelling was undertaken on behalf of the applicant to assess the capacity of the wastewater network to service future development enabled by PPC23. The modelling was based on a local pressure sewer network as the proposed wastewater servicing option for any future development. The results of the wastewater network model were incorporated into the technical assessment provided in support of PPC23.

27. While the reduced peak discharge associated with a local pressure sewer network can be accommodated within the 300mm diameter gravity sewer on Lower Styx Road, modelling indicates that the recently confirmed capacity of the downstream Heyders Pumpstation (PS78) would be exceeded.

28. In 2018 Council advised that both the wastewater network and downstream Heyders Pumpstation (PS78) had sufficient capacity to service a local pressure sewer network for a limited residential development as part of the Whisper Creek Golf Estate (70 residential lots). Council also advised at that time that odour treatment and corrosion protection would be required.

29. While the wastewater network in other parts of the city has limited capacity to accommodate greenfield development of the scale proposed by this plan change, Council is providing local pressure sewer network capacity to service approximately 1,300 households within the Highfield South Outline Development Plan area.

30. To service future development within the proposed plan change area, the design capacity of the downstream Heyders Pumpstation (PS78) will have to be recovered. This will involve cleaning of the dual rising mains and renewal of both the duty and standby pumps. In addition, adverse odour and corrosion effects on downstream wastewater infrastructure will need to be mitigated through the provision of an additional odour treatment facility or the upgrade of existing odour treatment facilities as may be appropriate. The design, construction, commissioning and handover of these works must be

secured through an Infrastructure Provider Agreement, and the works completed prior to any future development occurring.

31. I have advised the applicant that Council will retain discretion as to whether individual on-site local pressure sewer units within the proposed plan change area will be accepted for vesting or will be required to remain privately owned. This determination will be made through future consenting processes.

RESPONSE TO SUBMISSIONS

32. I have considered the 36 submissions received in relation to water supply and wastewater capacity concerns. These include submitters who highlight that existing water pressure is already poor and assert that the Kainga/Spencerville water and wastewater networks lack capacity.

33. My evidence is that additional groundwater abstraction and associated treatment, together with new water supply and wastewater networks, and targeted upgrades to the downstream wastewater pump station would enable future development within the proposed plan change area.

34. Some submitters refer to perceived deficiencies in the water and wastewater technical assessment supporting PPC23 and contend that Council input has been absent. In my opinion, Appendix B – Infrastructure Report is founded on Council capacity assessments and advice and supported by wastewater network modelling as commissioned by Council. My evidence addresses minor clarifications to the Water and Wastewater technical assessment.

35. Two submissions assert that the establishment of new wells would adversely affect surrounding wells. In my view, this concern is appropriately addressed by Council requirement for groundwater abstraction from deeper aquifers, while specifying the need for due process, including the need to obtain water take abstraction consent from Environment Canterbury.

36. The proposed servicing of future development through a local pressure sewer network is the most suitable approach given the ground conditions and high groundwater table. This also aligns with the wastewater servicing option implemented post-earthquake for properties to the north of the proposed plan change area.

37. One submitter raised a concern about sewerage odour at the corner of Lower Styx Road and Seabrook Road. Odorous gases occur in wastewater

networks where extended hydraulic retention times exist and where hydrogen sulphide is released from rising main and pressure sewer discharges. As both conditions occur within the existing network, odour treatment has been provided at both the Lower Styx Pumpstation (PS77) rising main discharge location opposite 415 Lower Styx Road, as well as at Heyders Pumpstation (PS78)

38. Any existing odour issues should be reported to Council's Three Waters Unit to enable investigation into the operation of the odour control facilities and to determine whether there are blockages or other operational matters that are causing the localised odour issues. In my opinion, the introduction of increased wastewater flows into the Lower Styx Road network will reduce hydraulic retention times within the network and downstream pump station and could reduce the potential for odour generation from long hydraulic retention times.

39. Council's minimum requirements for local pressure sewer networks include provision for odour and corrosion mitigation, as referenced elsewhere in my evidence.

40. Submitters have raised concerns that the proposed water and wastewater network upgrades may result in unreasonable increases in rates. While my evidence is confined to the technical aspects of the proposal, I acknowledge that the additional groundwater abstraction and treatment pump station, together with the associated water supply and wastewater networks, will increase the Three Waters operational costs. It is, however, also relevant that these costs will be distributed across an expanded rating base as development occurs.

41. The future developer will be required to fund and deliver additional groundwater abstraction, treatment and network infrastructure and will also be responsible for renewing the pumps at the Heyders Pumpstation (PS78) and undertaking maintenance of the dual rising mains through Bottle Lake Forest. Any decision regarding the ownership of individual local pressure sewer units will be taken in consideration of the ongoing cost implications for Council.

CHRISTCHURCH DISTRICT PLAN AMENDMENTS

42. I propose the following changes to the Christchurch District Plan amendments for water and wastewater and provide the reasons for these changes below.

    42.1 I recommend that the title '*WATER AND WASTEWATER*' be changed to 'WATER SUPPLY AND WASTEWATER' to better align with the Three Waters activity description including the Three Waters Water Supply and Wastewater Bylaws.

    42.2 The narrative in section 5(a) suggests that there is a need for only one new bore, whilst the water demand for the future development enabled by PPC23 is expected to exceed the water supply take from a single groundwater bore that abstracts from Aquifer 3, 4 or 5. I also believe that it is necessary to mandate compliance with Council standards and minimum requirements.

    42.3 I recommend that section 5(a) '*A water supply network and an associated new bore and water treatment plant and potential storage facility'* be changed to 'A supplementary groundwater abstraction and water treatment pump station, designed and constructed in accordance with an Infrastructure Provider Agreement that incorporates Council standards and requirements, supplying into a new water supply network integrated with the Brooklands–Kainga water supply zone'.

    42.4 Section 5(c) is not technically correct because the pressure main that services a local pressure sewer network forms part of the network and is not referred to as a rising main. It is proposed that the wastewater from the future development should be discharged into the DN300 UPVC gravity sewer in Lower Styx Road rather than extending the pressure main to the Heyders Pumpstation (PS78). I also believe that it is necessary to mandate compliance with Council standards and minimum requirements.

    42.5 I recommend that section 5(c) '*A local pressure sewer network, discharging to a rising trunk sewer to be laid along Spencerville Road, over the existing bridge and then along Lower Styx Road to pump station 78 at Heyders Road in Spencerville'* be changed to A local pressure sewer network discharging via a pressure main along Spencerville Road into the Lower Styx Road gravity sewer network,

including odour treatment, corrosion protection and the upgrade of the Heyders Road Pumpstation (PS78), to be designed and constructed in accordance with an Infrastructure Provider Agreement incorporating Council standards and requirements.

42.6 To ensure that Council retains discretion regarding the ownership of individual local pressure sewer units, it is proposed that the following item be added as section 5(d): 'Council will exercise its discretion to determine whether individual local pressure sewer units are to be vested in Council or remain in private ownership.'

CONCLUSION

43. Water supply servicing for future development enabled by PPC23, will require the development of additional groundwater abstraction and treatment capacity that supplies into a new water supply network that is integrated with the Brooklands-Kainga water supply zone.

44. Wastewater servicing for future development enabled by PPC23, via a local pressure sewer network, can be accommodated within the gravity sewer network on Lower Styx Road. However, upgrades to the downstream Heyders Pumpstation (PS78) will be required to provide sufficient pumping capacity, together with measures to mitigate odour and corrosion effects.

45. All water supply and wastewater infrastructure established by a future developer and proposed to be vested in Council will have to comply with Council standards and minimum requirements and be delivered in accordance with an Infrastructure Provider Agreement with Council.

46. The Outline Development Plan should clearly emphasise and incorporate the water supply and wastewater servicing requirements as outlined in my evidence.

Date: 23 March 2026

Michele Ann McDonald

APPENDIX 9 – REVIEW OF PPC23 AND SUBMISSIONS RELATED TO STORMWATER AND FLOODING MATTERS BY BRIAN NORTON, SENIOR STORMWATER PLANNING ENGINEER - STORMWATER TEAM AT COUNCIL

BEFORE INDEPENDENT HEARING COMMISSIONERS IN CHRISTCHURCH

TE MAHERE Ā-ROHE I TŪTOHUA MŌ TE TĀONE O ŌTAUTAHI

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the hearing of submissions on Private Plan Change 23 Whisper Creek, Spencerville to the Christchurch District Plan

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STATEMENT OF PRIMARY EVIDENCE OF ROBERT BRIAN NORTON ON BEHALF OF CHRISTCHURCH CITY COUNCIL

Dated: 16 April 2026

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EXECUTIVE SUMMARY

1. My full name is **Robert Brian Norton**. I am employed as a Senior Stormwater Planning Engineer at Christchurch City Council (the **Council**).

2. I have prepared this statement of evidence on behalf of the Christchurch City Council (the **Council**) in respect of matters arising from the submissions and further submissions on Private Plan Change 23 Whisper Creek, Spencerville to the Christchurch District Plan (the **District Plan**; **PC23**).

3. My evidence discusses stormwater quality, stormwater quantity and flooding matters relating to the proposed plan change enabling residential development of the land. Related matters of Vertical Land Movement (**VLM**) and Tsunami Risk impact overall flood risk, but are outside of my area of expertise.

4. Residential development of the site will increase the rate of stormwater runoff and will increase the concentration of urban contaminants in stormwater discharges. If unmitigated, these higher stormwater flows and increased volumes will exacerbate existing flood hazards and contribute to an ecological decline of natural waterway and wetland systems.

5. Water quality and quantity effects of development can be mitigated by provision on onsite stormwater treatment and storage systems (typically basins and wetlands) to capture, treat and attenuate stormwater discharges from the development area.

6. Portions of the site is also at risk of fluvial and tidal flooding and Tsunami. The combination of sea level rise and VLM will increase those flood risks over time.

7. Current and future flood risk can be mitigated by earthworks to raise land levels, roads and dwellings above the predicted floodplain.

8. I recommend the applicant consult a specialist in VLM and Tsunami to make recommendations on how to mitigate these risks.

INTRODUCTION

9. My full name is **Robert Brian Norton**. I am employed by the Council in the role of Senior Stormwater Planning Engineer in the Asset Planning – Stormwater and Waterways unit. I have held this position since April 2010. I am responsible for implementation of the Council's Stormwater Management Plans, delivery of the Council's capital programme for growth infrastructure, administration of the Council's Comprehensive Stormwater Network Discharge Consent and for providing technical review and advice on building, subdivision and land use consent applications.

10. As part of my role at the Council, I have been asked to provide technical advice on the Council's stormwater network planning, flooding and water quality in the context of proposed PC23.

11. In preparing this evidence I have reviewed the following documents:

    (a) Request for Change to the Christchurch District Plan to rezone land generally located at 240 Spencerville Road, Marshlands from a Specific Purpose (Golf Resort) Zone and Rural Urban Fringe Zone to a Residential New Neighbourhood Zone, Final (September 2025).

    (b) Appendix B – Infrastructure Report, Whisper Creek – Proposed Subdivision, 19432 Rev 4 (May 2025).

    (c) Appendix K – Whisper Creek Plan Change – Christchurch District Plan Amendments.

    (d) The summary of Submissions on the publicly notified plan change.

12. I am authorised to provide this evidence on behalf of the Council.

Qualifications and experience

13. I hold a Bachelor of Science degree in Civil Engineering from the University of Washington in Seattle, USA.

14. I have 26 years' experience as a civil engineer specialising in stormwater planning, flood management and site development. During this time I have worked with local government in King County (Washington State, USA), with private consultancies, and presently with Christchurch City Council.

15. I have been involved in the development of various Council standards and guidelines relating to stormwater management. I have also been involved in

several plan changes, Council and Environment Court hearings that relate to stormwater and flood management, consenting and development.

Code of conduct

16. While this is a Council hearing, I have read the Code of Conduct for Expert Witnesses (contained in the 2023 Practice Note) and agree to comply with it. Except where I state I rely on the evidence of another person, I confirm that the issues addressed in this statement of evidence are within my area of expertise, and I have not omitted to consider material facts known to me that might alter or detract from my expressed opinions.

Scope of evidence

17. My statement of evidence addresses the following matters:

    (a) Characteristics of the site;

    (b) Mitigation of stormwater quality and flooding effects;

    (c) Existing and future flood risks; and

    (d) Response to submissions;

18. I address each of these points in my evidence below.

CHARACTERISTICS OF THE SITE

19. Christchurch is a flat, low-lying, coastal city with shallow groundwater making it geographically and hydraulically challenging to provide stormwater services. The stormwater services the Council provides include stormwater drainage, flood management, water quality treatment and emergency management.

20. Many coastal areas of the city currently experience issues with frequent stormwater ponding and flooding not only as a legacy of poor historical development practices, but as a consequence of land settlement exacerbated by the 2010 Canterbury Earthquake Sequence. Effects are amplified by development within low lying or flood prone land, in areas with insufficient or insufficiently protected overland flow paths and by the sizing of older infrastructure that does not meet modern demands.

21. Greenfields development is often expected to provide onsite stormwater management systems to mitigate the effects of the development. These

systems will typically vest to Council as new stormwater and flood control assets. Council expect that these assets be high quality, sustainable systems designed in accordance with current standards and guidelines. Greenfield stormwater mitigation systems are expected to provide multiple values[1] (landscape, recreation, ecology, culture, heritage) and use natural processes of soils and vegetation for treatment of stormwater.

22. The PC23 development area is currently rural farmland. Any surface water generated during rainfall discharges to an onsite watercourse named Spencers Drain (classified as a Network Waterway in the District Plan). Spencers Drain runs 2km northeast to a confluence with Kainga Stream immediately prior to discharge into the Styx River. Spencers Drain will continue to provide the stormwater outfall for development of the site.

23. The Styx River runs north along the partially red-zoned neighbourhood of Brooklands before discharging east to the Brooklands Lagoon, the Waimakariri River and out to the Pacific Ocean.

24. The Styx River and Spencers Drain are tidally dominated here. There are flood gates on Styx River operated by Canterbury Regional Council approximately 300m downstream of Harbour Road and flood gates on Spencers Drain 150m upstream of the outfall to the Styx River. The flood gates protect lower lying land from tidal inundation and surges, however when high tides coincide with moderate to large storm events, water will back up along Styx River and Spencers Drain, flooding the low-lying land.

25. An extensive portion of the site is mapped within the District Plan as Flood Management Area (**FMA**), Flood Ponding Management Area (**FPMA**) and High Flood Hazard Management Area (**HFHMA**). Subdivision is a non-complying activity within the FPMA and HFHMA. Earthworks are also restricted in these areas due to their sensitive nature and the natural flood ponding storage they provide. Typically earthworks within the FPMA and HFHMA can be consented if they do not displace or divert floodwaters onto other property.

MITIGATION OF STORMWATER QUALITY AND FLOODING EFFECTS

26. Three primary Council documents provide the framework for mitigation of the stormwater quality and flooding effects of development:

[1] CCC Waterways and Wetlands Natural Asset Management Strategy 1999

(a) Pūharakekenui-Styx Stormwater Management Plan (2012, 2025);

(b) Waterways, Wetlands and Drainage Guide (CCC, 2003); and

(c) Comprehensive Stormwater Network Discharge Consent (CSNDC) CRC252424.

27. The first flush[2] of stormwater generated from new development is required to pass through a treatment train consisting of a sedimentation basin followed by constructed stormwater wetland. Contaminated stormwater is held in the sedimentation basin for up to 96 hours, allowing sediment to settle out. Pre-treated water then trickle discharges to a constructed stormwater wetland. Within the wetland, partially treated stormwater undergoes another 2 days average residence time through the wetland where further settling, trapping and uptake of contaminants occurs via contact with dense vegetation before discharging to the receiving environment. The first stage of treatment removes primarily coarse sediment and gross pollutants while the wetland stage removes fine sediment and dissolved metals. Wetland systems are also efficient at reducing high nutrient loads and E.coli.

28. No treatment system is capable of removing all contaminants from stormwater. A properly designed treatment train described above is considered international best practice and would be expected to have an pollutant removal efficiency of 60-80% for solids and 40-80% for metals[3].

29. To mitigate the flooding effects of additional runoff caused by new sealed surfaces (roads, buildings and other hardstand areas) of development, stormwater is captured during a storm and released slowly into the receiving environment such that the “peak” of the storm passes along the receiving waterway. By releasing attenuated stormwater slowly back into the network, it prevents the extra water from increasing the peak flood levels downstream.

30. For Styx catchment, Council’s CSNDC[4] requires a water quantity mitigation scheme called “Full Flood Attenuation”, which amounts to capturing the full volume of the critical (50-year, 48-hour storm) with slow release over 96 hours. In most circumstances, Full Flood Attenuation reduces peak

[2] The “first flush’ represents the first portion of stormwater runoff that leaves a developed surface. This stormwater contains the highest concentration of contaminants. The first flush is defined in the CSNDC as the runoff generated from the first 25mm of rainfall OR the flow rate generated from 5mm/hr rainfall intensity.
[3] Waterways, Wetlands and Drainage Guide, Table 6-6
[4] CRC242

stormwater flows leaving a development site to less than the site's pre-development flow rates. An increased stormwater *volume* is generated, however that volume of water is released slowly into the network, allowing upstream flood waters to pass without increasing the water level of the watercourse or the floodplain.

31. In areas of high groundwater, and particularly in coastal areas where groundwater is expected to rise in conjunction with SLR, the interface of groundwater with stormwater basins and wetlands requires consideration. If groundwater exfiltrates through the floor of a stormwater basin, it will reduce the volume of stormwater storage available in the basin. If this groundwater is saline, it may adversely affect the health of grass cover or wetland vegetation. The infrastructure report has not addressed how the future effects of increased groundwater elevation in conjunction with long term SLR projections on the functioning of stormwater basins and wetlands will be managed or mitigated.

32. Any proposed filling within the existing or future floodplain will require compensatory storage to offset the loss of live flood storage to ensure that the development will not displace ponded flood waters onto adjacent low-lying properties. The application notes (p.11, Infrastructure Report) that "*The flood volume of the High Hazard Management Area will not be reduced*". While encouraging, I consider more specific conditions would be required at time of resource consent to ensure filling effects on the floodplain are mitigated.

EXISTING AND FUTURE FLOOD RISKS

33. Effective 15 January 2026, Ministry for the Environment (**MfE**) released the National Policy Statement for Natural Hazards (**NPS-NH**). Policy 6 states that "*The potential impacts of climate change to at least 100 years into the future must be considered.*"

34. The policy suggests Councils need to at least consider risk and mitigation of sea level rise recommended by experts, even if this recommendation is not within the operative District Plan.

35. Coastal hazard guidance suggests applying Relative Sea Level Rise (**RSLR**) which is a combination of sea level rise (**SLR**) projections and vertical land movement (**VLM**).

36. Council adopted a new Styx River model in December 2025. The results of this flood model were not available to the applicant when the private plan change application was lodged. Therefore, the Council provided preapplication advice based on the Council's best understanding of relative sea level rise and fluvial flooding predictions that were available at the time.

37. None of the flood model results generated by either version of Council's flood models include VLM/RLSR factors, only SLR in isolation.

38. The study of vertical land movement is outside of my expertise and I therefore cannot make a recommendation for an overall RSLR factor that should be applied to this Plan Change. I recommend that the applicant consult with coastal VLM experts and form a view on a RSLR factor that complies with MFE's NPS-NH.

39. The 2025 Styx River flood model results provide critical ponding levels for the 1 in 10 year, 1 in 50 year and 1 in 200 year flood events with various factors of SLR prediction. The peak water levels predicted in the modelling are based on the highest of a series of pre-determined combinations of rainfall and tide annual return intervals. This algorithm is referred to as "max of max".

40. To comply with the MfE guidelines, I recommend that the minimum land levels for new development be based on the 1-200 year "max of max" flood prediction assuming 1.2m SLR (2.88m NZVD) plus some appropriate factor of VLM, and that the finished floors of new dwellings be set based on this peak water level plus 400mm of "vertical freeboard" as required by the District Plan. This will require that the site be filled to allow for finished floors of dwellings to be set to 3.28m NZVD plus some appropriate factor of VLM. Assuming average 250mm high standard building foundations, this implies site fill levels above around 3.03m plus some appropriate factor of VLM.

41. I recommend that the minimum level of all internal roading, including the intersections with Spencerville or Turners Road, be built up to a level which limits the depth of ponding flooding to allow for the safe ingress/egress of passenger vehicles[5] in the event of an evacuation for flooding, tsunami or other natural disaster. I recommend this depth of predicted flooding be no more than 150mm measured at the kerb in a 1 in 50 year event.

[5] CCC Infrastructure Design Standard Part 5.6.2

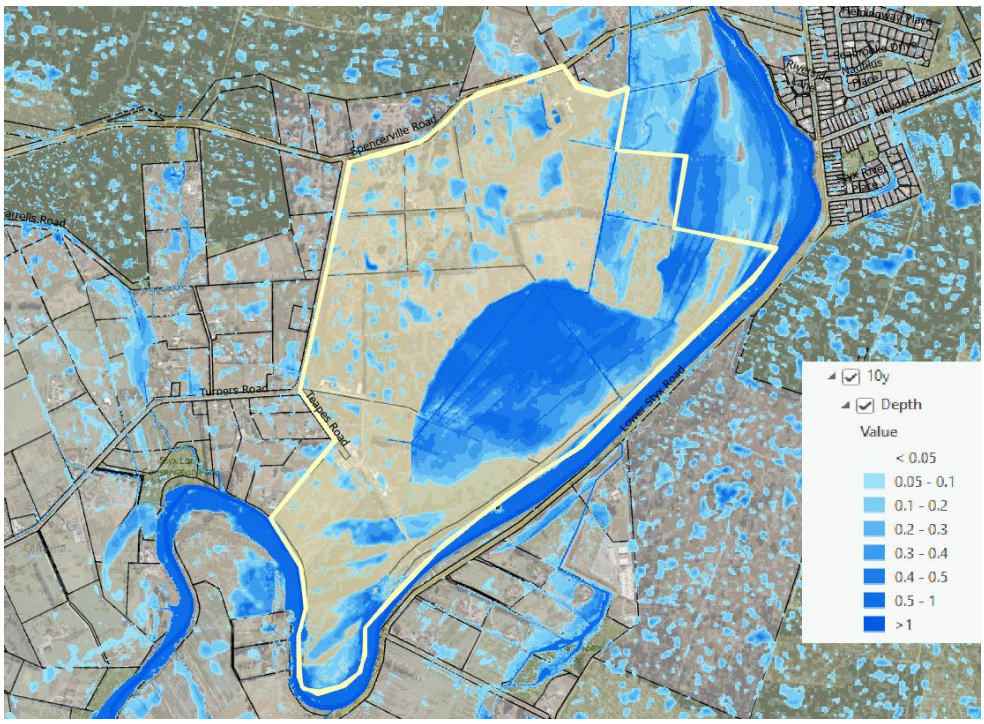


Figure 1: 1 in 10 year flood prediction (Present Day, 0m SLR)

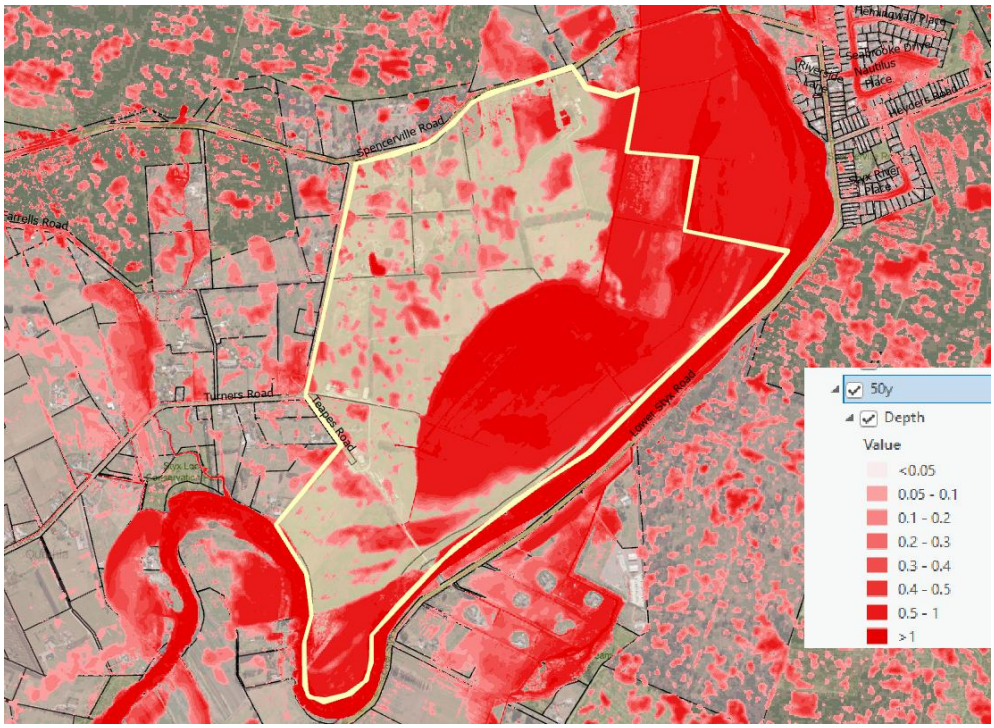


Figure 2: 1 in 50 year flood prediction (2063, 0.45m SLR)

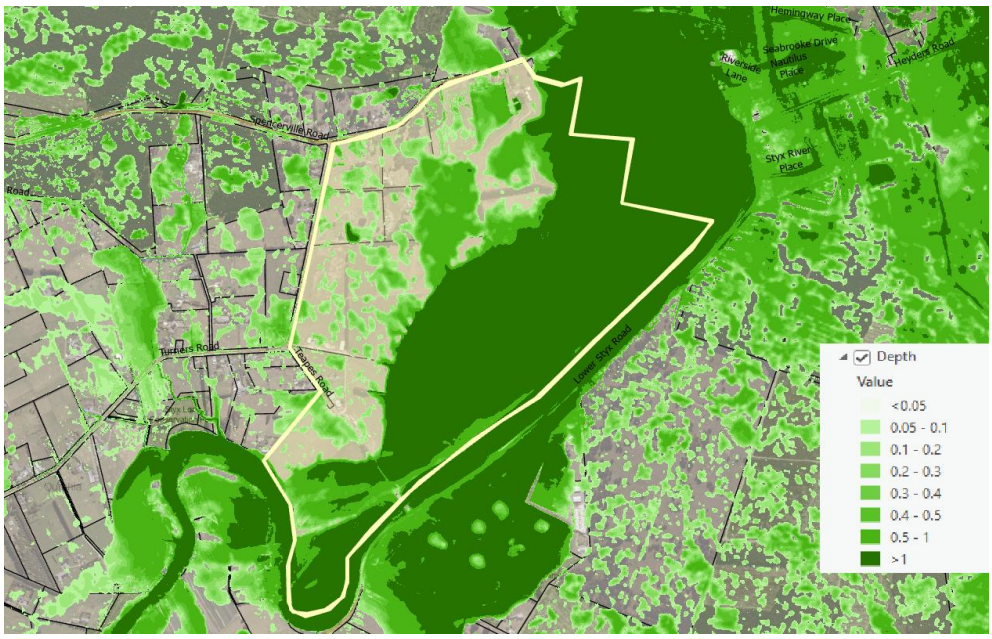


Figure 3: 1 in 200 year flood prediction, 1.0m SLR

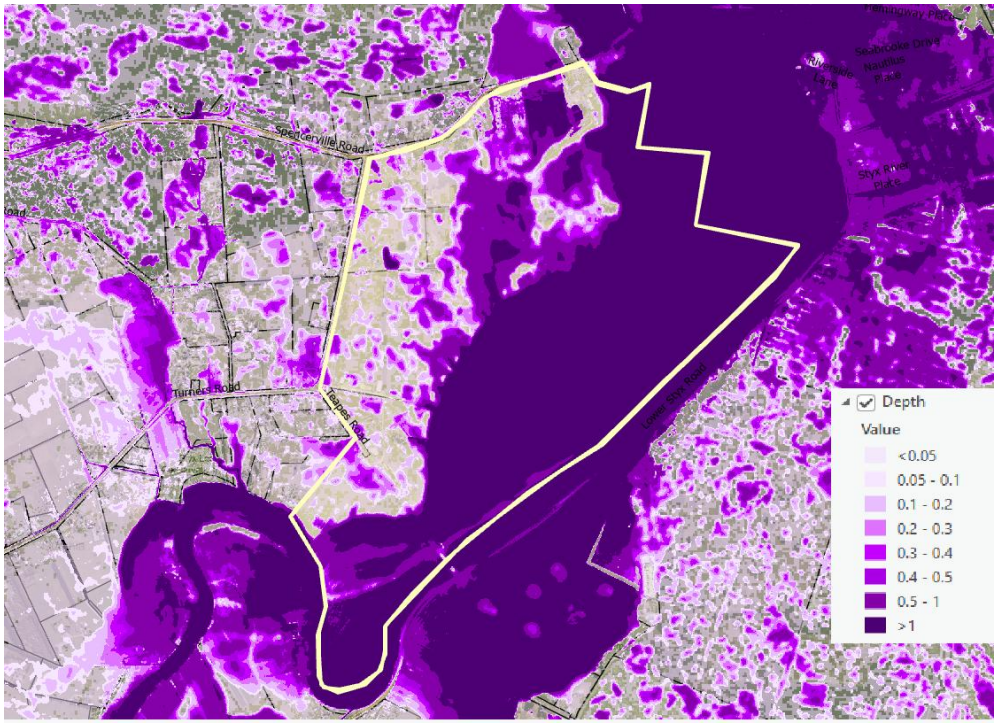


Figure 4: 1 in 200 year flood prediction, 1.2m SLR

TSUNAMI

42. Tsunami risk is outside of my expertise and I therefore cannot make a recommendation for risk consideration factors that should be applied to this Plan Change.

43. However, I note that Council released a 2019 Tsunami Study[6] prepared by the National Institute of Water & Atmospheric Research (**NIWA**) which includes inundation mapping of a distant (South American) source tsunami of 1 in 500 and 1 in 2500 annual return interval probabilities combined with 0m, 0.19m, 0.41m and 1.06m SLR scenarios. This study is intended to be indicative only and not used for specific site assessments. However, the mapping suggests that a portion of the site may be subject to significant hazard in the range of events considered (1 in 500 year and 1 in 2500 year Tsunami events).

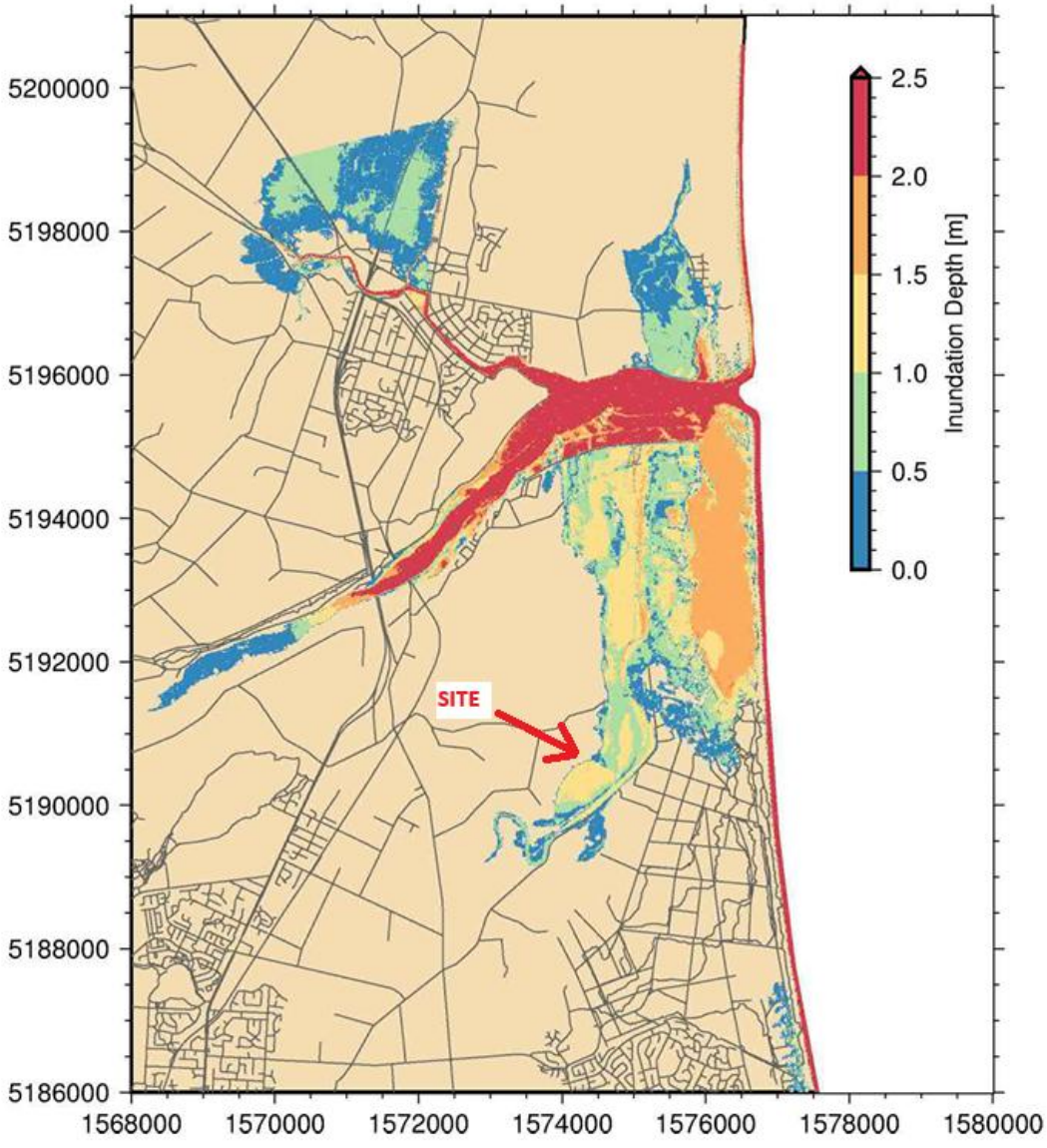


Figure 3-21: Maximum inundation depth (i.e., height above ground) for 1:500-year return period event Current Sea Level - Northern Section. Note that for the river channels the value given is the height above the pre-tsunami water level.

[6] https://ccc.govt.nz/assets/Documents/Environment/Water/Flooding-Land-Drainage/Tsunami-Study-Final-report-June-19.pdf

Figure 5: 1 in 500 Tsunami Inundation Depth, 0m SLR

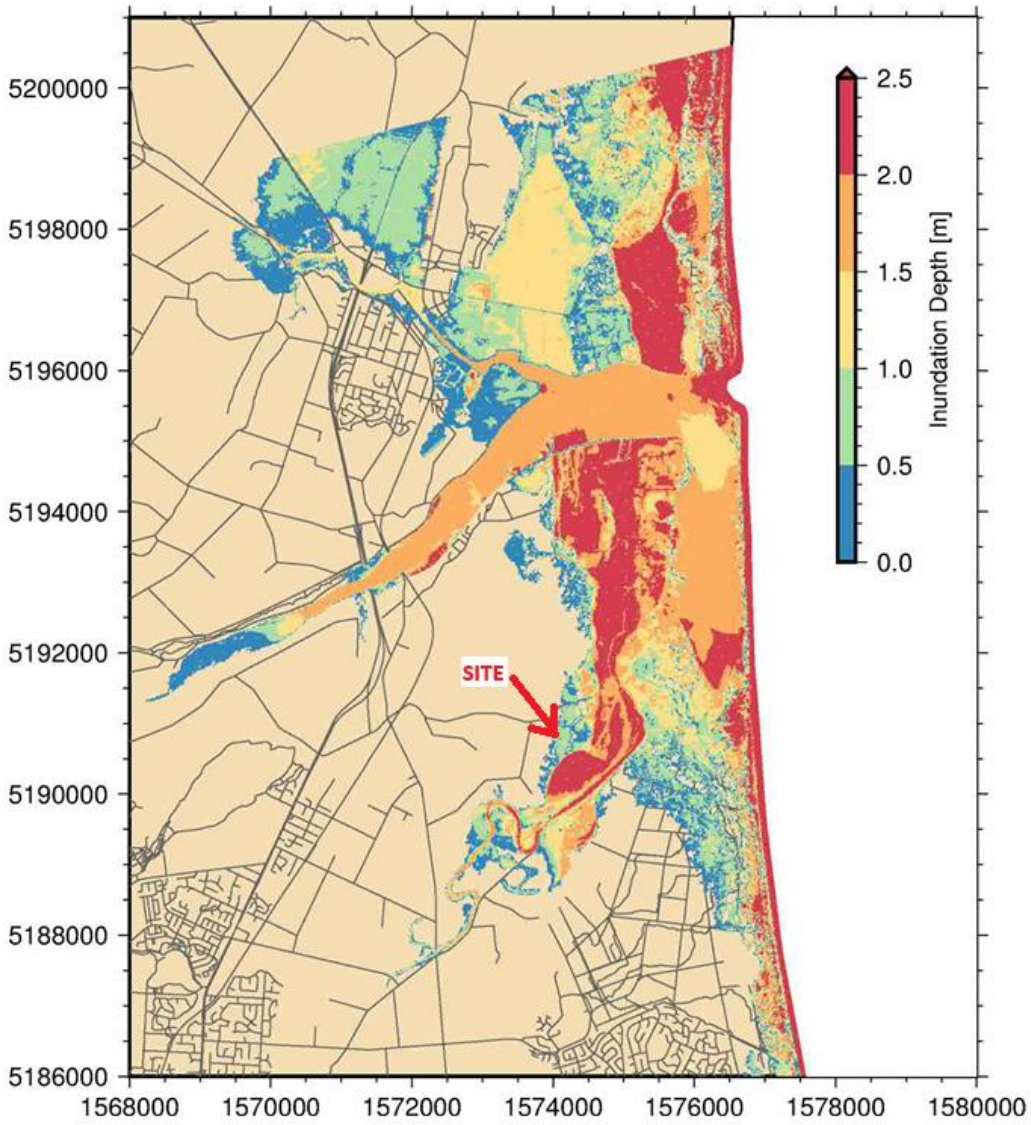


Figure 3-49: Maximum inundation depth (i.e., height above ground) for 1:2500-year return period - 2120 Sea Level Scenario – 1.06 m Sea Level Rise - Northern Section. Note that for the river channels the value given is the height above the pre-tsunami water level.

Figure 6: 1 in 2500 Tsunami Inundation Depth, 1.06m SLR

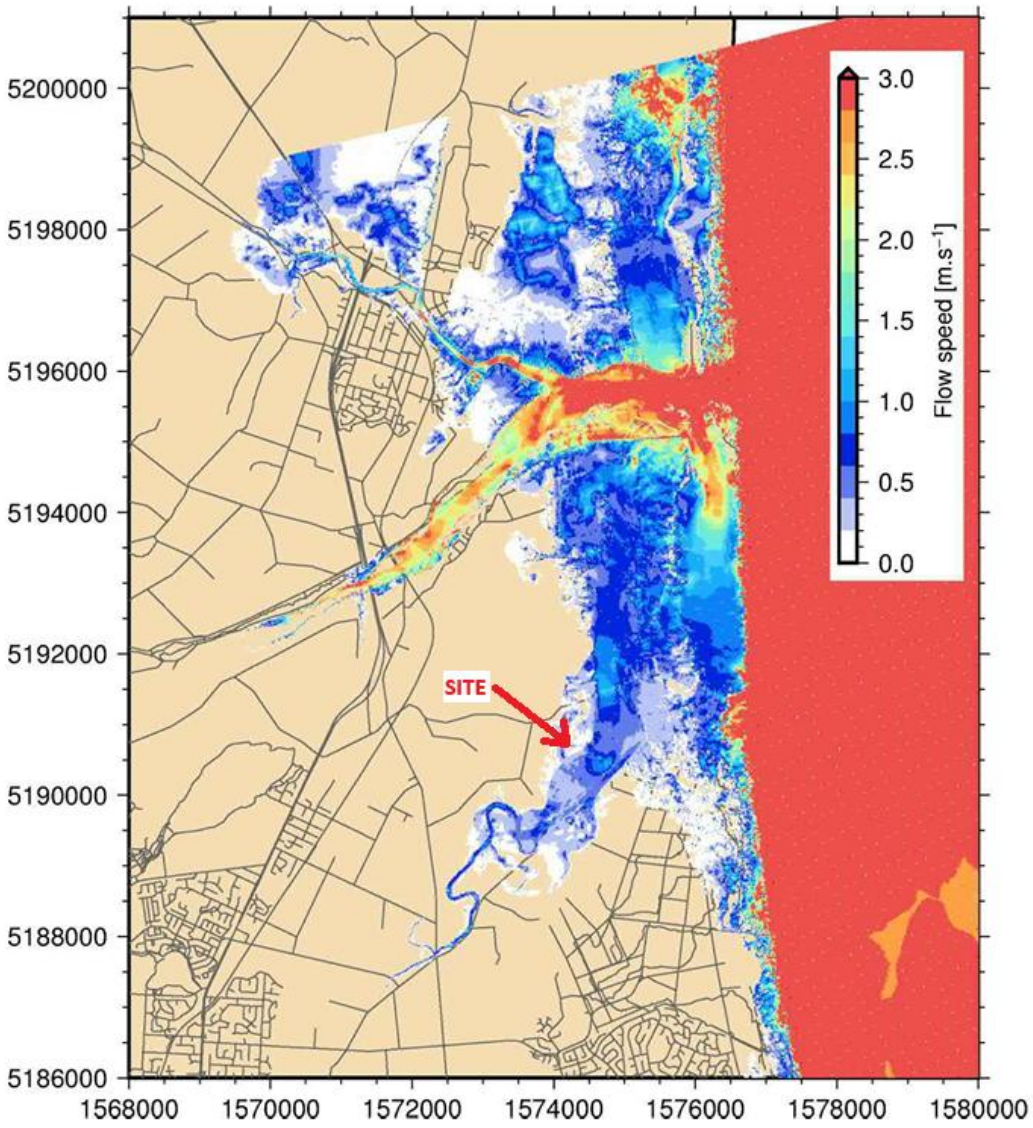


Figure 3-50: Maximum flow velocity for 1:2500-year return period - 2120 Sea Level Scenario – 1.06 m Sea Level Rise - Northern Section.

Figure 6: 1 in 2500 Tsunami Flow Velocity, 1.06m SLR

44. I recommend that the applicant consult with coastal tsunami risk experts and form a view on risk and mitigation assessments.

RESPONSE TO SUBMISSIONS

45. Several submitters[7] raised concerns about flooding effects of development, many of them noting that parts of the site are identified as a known flood hazard area.

[7] #10 Daniel Miller, #11 Kim Melony Foot, #13 John Kennedy, #14 Spencerville Residents Association, #15 Kerryanne Van de Loo, #16 Cora Howison, #17 Tony Wilson, #18 Zhongyu Duan, #19 Marcus van Valkenburg, #20 Deanna Riwaka, #21 Colin John Mitchell, #23 Renee Howison, #24 Dominic Lowe, #27 Alexander Smirnoff, #28 David Parker, #31 Angela User, #32 Caitlin Elkington, #34 Debbie Ling, #35 Rueben Ennor, #38 Nicole Duxbury, #41 Mel Gilmore, #42 Jenny Knight, #45 Daniel John Knight, #50 Dan McGarvey, #51 Gail Lowe, #54 Jesse Lowe, #55 Karen Wakelin, #56 Anne Scott, #62 Aleesa McKenzie, #65 Celeste Faithfull, #66 Debbie Lee

46. I consider that the site is able to mitigate its effects on downstream flooding by providing sufficient onsite rainwater storage and by providing compensatory flood storage for any proposed filling of land within the existing floodplain. I consider that the site can protect new dwellings from existing flood hazards by raising the land to an appropriate level. All of these performance standards will be set as conditions through resource consent for subdivision.

47. Canterbury Regional Council (Submission #69) notes that the proposed location of the constructed stormwater basins and wetlands for stormwater treatment and attenuation are within the High Flood Hazard Management Area and consider that this placement will compromise the functioning of these systems during large rain events.

48. I consider that the stormwater treatment systems (first flush basin and wetland) should be protected from outside inundation for events up to the critical 10-year flood event, as is consistent with design principles set out in the Waterways, Wetlands and Drainage Guide (**WWDG**)[8] and the Pūharakekenui-Styx Stormwater Management Plan[9]. In floods larger than the 1 in 10 year, flood waters are permitted to enter the wetland system to activate flood storage, and the 1 in 50 year flood is permitted to enter any other basins. I do not consider a design meeting these parameters will experience compromised functioning except for in rare, large storm events. This is consistent with the design of other stormwater facilities within known flood areas of Christchurch City (i.e.; Hendersons Basin, Greens Stream).

CONCLUSION

49. I consider broadly that the development enabled by this plan change is capable of mitigating its effects on stormwater and flooding where the ODP narrative is amended to record that:

    (a) Any proposed earthworks within the existing or future floodplain includes compensatory storage sufficient to:

        (i) offset the loss of live flood storage.

English, #67 Denis John Gilmore, #70 George Nimmo, #72 Penelope Ann Hargreaves, #73 Tamara Tracy Watson Wells, #75 John J. Messerly,

[8] WWDG 6.8.2 Wet Ponds and Wetlands – Flood Flows

[9] Pūharakekenui-Styx Stormwater Management Plan part 9.2.2 Partial Detention and Full Detention

(ii) Ensure that the development will not displaced flood waters onto adjacent low-lying properties; and

(iii) ensure the flood volume of the HFHMA is not reduced.

(b) That minimum land levels for new development shall be based on:

(i) the 1 in 200 year “max of max” flood prediction;

(ii) a 1.2m SLR plus appropriate factor of VLM; and

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

(c) All internal roading, including the intersections with Spencerville or Turners Road, be built to a level that will limit the depth of flooding, as measured at the kerb, to no more than 150 millimetres in a 1 in 50 year “max of max” flood prediction to allow for the safe ingress/egress of passenger vehicles in the event of an evacuation for flooding, tsunami or other natural disaster.

50. I recommend, however, that the applicant seek specialist advice and consider mitigation measures on the following matters:

(a) VLM to establish an appropriate RSLR factor;

(b) Tsunami Risk; and

(c) Methods to protect stormwater facilities from groundwater intrusion with consideration for projected groundwater increases as a result of RSLR.

Date: 16 April 2026

Robert Brian Norton

APPENDIX 10 –REVIEW OF PPC23 AND SUBMISSIONS RELATED TO OPEN SPACE MATTERS BY PETER BARNES, SENIOR PARKS AND POLICY LANNER, PLANNING AND POLICY TEAM AT COUNCIL

BEFORE INDEPENDENT HEARING COMMISSIONERS
IN CHRISTCHURCH

TE MAHERE Ā-ROHE I TŪTOHUA MŌ TE TĀONE O ŌTAUTAHI

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the hearing of submissions on Private Plan Change 23 Whisper Creek, Spencerville to the Christchurch District Plan

---

STATEMENT OF PRIMARY EVIDENCE OF PETER BARNES ON BEHALF OF CHRISTCHURCH CITY COUNCIL

Dated: 23 April 2026

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EXECUTIVE SUMMARY

1. My full name is **Peter Jason Barnes**. I am employed as a Senior Parks and Policy Planner at Christchurch City Council (the **Council**).

2. I have prepared this statement of evidence on behalf of the Christchurch City Council (the **Council**) in respect of Private Plan Change 23 Whisper Creek, Spencerville to the Christchurch District Plan (the **District Plan**; **PC23**).

3. My evidence covers the provision of:

   3.1 Neighbourhood Park land~~,~~ to adequately provide community open space, and

   3.2 Pedestrian and cycle access linkages.

4. Residential development requires the provision of Neighbourhood Parks. Neighbourhood Parks provide essential opportunities for the community, including - open space, green landscapes, meeting places, children's play space and passive recreation. If not provided, the community are forced to travel significant distances to visit already existing Neighbourhood Parks.

5. The Parks Activity Plan and Public Open Space Strategy 2010-2040 provide~~s~~ detail and Level of Service for Neighbourhood Parks city-wide.

6. With minor changes to the applicant's proposal, I support the proposed Neighbourhood Park network and pedestrian and cycle linkages.

7. I note that exact Neighbourhood Park locations, and the planning for pedestrian /cycle linkages will be finalised at the future subdivision stage.

INTRODUCTION

8. My full name is Peter Jason Barnes. I am employed by the Council in the role of Senior Parks and Policy Planner in the Parks Unit. I have held this role and similar positions since January 2011.

9. I am responsible for providing parks planning technical review and advice on building, subdivision and land use consent applications.

10. As part of my role at the Council, I have been asked to provide technical advice on the Council's Recreation Reserve/Neighbourhood Parks requirements, and pedestrian/cycle access, within the proposed PPC23.

11. In preparing this evidence I have reviewed the following documents:

    (a) Request for Change to the Christchurch District Plan to rezone land generally located at 240 Spencerville Road, Marshlands from a Specific Purpose (Golf Resort) Zone and Rural Urban Fringe Zone to a Residential New Neighbourhood Zone, Final (September 2025).

    (b) Appendix K – Whisper Creek Plan Change – Christchurch District Plan Amendments.

    (c) The summary of Submissions on the publicly notified plan change.

12. I am authorised to provide this evidence on behalf of the Council.

Qualifications and experience

13. I hold a Bachelor of Science degree (B.Sc.) in Physical Geography from the University of Canterbury, and a Master of Planning (MRRP) from the University of Otago.

14. I have 25 years' experience as a planner specialising in land use, subdivision, utilities, recreation and open space. During this time, I have worked as a private consultant, regional council planner and district council planner.

15. I have been involved in the development of District Plan policy and Outline Development Plans (ODPs), including Council and Environment Court hearings.

Code of conduct

16. While this is a Council hearing, I have read the Code of Conduct for Expert Witnesses (contained in the 2023 Practice Note) and agree to comply with it. Except where I state I rely on the evidence of another person, I confirm that the issues addressed in this statement of evidence are within my area of expertise, and I have not omitted to consider material facts known to me that might alter or detract from my expressed opinions.

Scope of evidence

17. My statement of evidence addresses the following matters:

    (a) Parks Planning in Christchurch;

    (b) The Proposed Site; and

    (c) Response to Submissions.

18. I address each of these points in my evidence below.

PARKS PLANNING IN CHRISTCHURCH

19. The Council has committed to parks provision through the Parks Activity Plan, Public Open Space Strategy 2010 (**POSS**) and District Plan ODPs.

20. The Council vision is to provide, develop and maintain a publicly accessible network of open space. The Council is committed to protecting, enhancing and maintaining the public open space network.

21. Council is committed to a park network with high quality assets which are affordable to maintain.

22. The Parks Activity Plan and POSS provides Open Space guidelines and Levels of Service. These are important so the Council provides a consistent network of parks city wide, for the community to utilise and enjoy.

23. The provision of Neighbourhood Parks is considered the first priority for new residential areas.

24. Neighbourhood Parks provide a rage of opportunities for the community, including open space, green landscapes, meeting places, children's play space and passive recreation. If an adequate number of Neighbourhood Parks not provided, the community will have to travel significant distances to visit parks in other areas.

25. Public open space is becoming increasingly important to support community wellbeing as private open space shrinks.

26. The Parks Activity Plan states the Level of Service for Neighbourhood Parks (or indeed other parks, except for Utility Parks) is a 3000m park located within 500m of 80% of residential lots. In addition, Neighbourhood

Parks are provided in urban areas at a rate of at least 1.9ha/1000 population.

THE PROPOSED SITE

27. For the proposed site, I note the applicant proposes three Neighbourhood Parks on the ODP. I consider that this number, in these locations provided, are consistent with Council Level of Service requirements. I consider that 80% of future residents will be located within 500m of a Neighbourhood Park.

28. I note that Ms. Schröders urban design evidence recommends that the middle of the three Neighbourhood Parks on the PPC23 ODP as notified is moved to the upper terrace further to the north-west.[1] I can confirm that this change in location does not compromise any parks planning provision matters and is consistent with the general guidance in the Parks Activity Plan and POSS.

29. I do not support the proposed ODP text stating that Neighbourhood Park "size to be determined at the time of subdivision". Instead, amended text "area of 3000m^2" more correctly aligns with other Council Neighbourhood Parks and will be a size that is affordable to Council to purchase and maintain.

30. I note that the ODP identifies large areas of "Rural Open Space and Recreation" (dark green), and 'Open Space and Marginal Zone (light green). I consider that wording is required on the ODP to clarify that this land may or may not be vested in Council ownership in the future. Specific discussions about the merits of vesting of land in Council ownership can only be covered at the future subdivision application stage.

31. I note that Council faces significant operations maintenance budget challenges, and land cannot be vested in Council ownership without a specific function, community benefit or available operational budget.

32. The ODP denoted "Pedestrian/cycle link/route/links" (light brown dashed line) can be retained, and are required, regardless of landownership. These

[1] Evidence of Ms. Schröder, Appendix 5, Executive summary, paragraph 9 (a) iii, pg. 5.

can be achieved via a number of methods, including public access easements over private land.

RESPONSE TO SUBMISSIONS

33. Three submissions comment on reserve matters.

Topic	Submission	Decision sought
Reserves Support - Improved recreation areas. Oppose - Insufficient amenities.	S7.1 D & K Casey; S8.1 True Form Building Ltd (TFBL); and S25.1 SLLT.	Support
	S25.2 SLLT (Developer to partner with the Trust); and S33.4 K & L Wells (Reserve requirements).	Neutral
	S51.1 G Lowe. S46.2 A Hicks (Accept only if greenbelt & landscape buffer to support wildlife & recreation are provided).	Reject

34. Parks planning, in partnership with stormwater management and ecological planning, will play a role in the provision of recreation areas and pedestrian and cycle linkages.

CONCLUSION

35. I consider that the provision of three Neighbourhood Parks of 3000m^2 on the ODP is consistent with Council parks planning requirements, to provide adequate community recreation opportunities within PPC23.

36. I consider that additional ODP text is required to clarify there are a number options around future ownership of “Rural Open Space and Recreation” (dark green), and ‘Open Space and Marginal Zone (light green) area. It cannot be assumed, until the subdivision stage, what quantum of this land will be vested into Council ownership.

37. I support the proposed ODP “Pedestrian/cycle link/route/links” (light brown dashed line), which will be possible through a variety of planning mechanisms, regardless of land ownership.

Date: 23 April 2026

Peter Jason Barnes

APPENDIX 11 – REVIEW OF PPC23 AND SUBMISSIONS RELATED TO TRANSPORTATION MATTERS BY DAVID SMITH, TECHNICAL DIRECTOR, TRANSPORTATION PLANNING AT ABLEY CONSULTANTS

BEFORE INDEPENDENT HEARING COMMISSIONERS
IN CHRISTCHURCH

TE MAHERE Ā-ROHE I TŪTOHUA MŌ TE TĀONE O ŌTAUTAHI

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the hearing of submissions on Private Plan Change 23 Whisper Creek, Spencerville to the Christchurch District Plan

---

STATEMENT OF PRIMARY EVIDENCE OF DAVID JOHN ROBERT SMITH ON BEHALF OF CHRISTCHURCH CITY COUNCIL

Dated: 20 April 2026

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EXECUTIVE SUMMARY

1. My full name is David John Robert Smith. I am employed as Technical Director of Transportation Planning at Abley Limited.

2. I have prepared this statement of evidence on behalf of the Christchurch City Council (the **Council**) in respect of matters arising from the submissions and further submissions on Private Plan Change 23 Whisper Creek, Spencerville to the Christchurch District Plan (the **District Plan**; P**PC23**).

3. My evidence focuses on traffic and transportation matters.

4. I have reviewed the Integrated Transportation Assessment (ITA) report prepared by Novo Group, RFI responses, relevant sections of the Section 32 report, proposed District Plan amendments and transport-related submissions and concluded that there are unmitigated or potentially unidentified safety and efficiency effects.

5. I have recommended that more assessment be undertaken as follows:

   (a) A safety assessment along the Spencerville Road corridor including the intersection of Marshland / Main North / Spencerville Road, and identify any mitigation required to offset increasing road safety risk as a result of Plan Change traffic.

   (b) Sidra Intersection modelling of the Marshland / Main North / Spencerville Road intersection to determine if further works are required to accommodate Plan Change traffic.

   (c) Consider establishing a direct vehicular connection to Lower Styx Road from the Plan Change site, which has the potential to change travel patterns including reducing traffic volumes in the vicinity of the School.

   (d) Assess the extent to which the Plan Change site along the northern property boundary (if established with fences or vegetation in the future) could potentially impede sight distances for traffic exiting the northern access, and if required vest this land as road reserve.

   (e) Undertake a multi-modal accessibility assessment for the full Plan Change site in line with CCC ITA guidelines

6. I have further recommended that the Outline Development Plan and/or amended planning provisions be updated to address the following matters.

   (a) Provide a direct pedestrian and cycle corridor connecting the site between Teapes Road and the Ouruhia Model School via Turners Road.

   (b) Provide a pedestrian and cycle corridor along Spencerville Road to connect the site to the intersection of Lower Styx Road and Spencerville Road.

   (c) Prepare a Level Crossing Safety Impact Assessment (LCSIA) in line with Kiwirail guidance on the Spencerville Road level crossing to the west of the site, to identify any required improvements prior to occupation of the Plan Change site.

   (d) Include proposed infrastructure upgrades identified in the ITA including:

      (i) Turners Road From Spencerville Road to Marshland Road is proposed to be upgraded to a 6.0m carriageway width 0.5m sealed shoulders.

      (ii) Teapes Road is proposed to be upgraded to 5.5m wide carriageway with 0.5m sealed shoulders when development commences that accesses Teapes Road.

      (iii) The Turners Road / Teapes Road intersection including squaring up the intersection.

      (iv) Turners Road / Spencerville Road intersection – land is to be vested for sight line improvements to the east along Spencerville Road.

7. I am unable to support the proposal in its current form. I consider that additional assessment is required to understand traffic effects, and amendments to the planning provisions and ODP as listed above are required to mitigate traffic safety effects associated with the Plan Change.

INTRODUCTION

8. My full name is David John Robert Smith. I am employed as Technical Director of Transportation Planning at Abley Limited. I have been in this position since 2018 and have been at Abley for 14 years.

9. I have been engaged by Christchurch City Council to prepare evidence in relation to traffic and transportation matters for PPC23.

10. In preparing this evidence I have:

    (a) Reviewed the following documents:

        (i) Integrated Transportation Assessment (ITA) prepared by Novo Group dated 16 April 2025 (Section 32 Appendix E).

        (ii) Transport-related Request for Information (RFI) responses.

        (iii) Relevant section of the Section 32 report and District Plan amendments (Section 32 Appendix K).

        (iv) Summary of submissions received prepared by Council.

    (b) Undertaken a site visit on Friday 13th February 2026 between 9am and 10am to understand the transport environment in relation to the Site.

11. I am authorised to provide this evidence on behalf of the Council.

Qualifications and experience

12. I hold a Bachelor of Technology with Honours in Industrial Operations Research and Master of Philosophy in Operations Research from Massey University. I am a Chartered Member of the Institute of Logistics and Transport (CMILT), a member of Engineering New Zealand (MEngNZ) and a member of the NZ Modelling User Group sub-group of Engineering NZ. I have previously been appointed to the NZ Transport Agency Independent Professional Advisors panel for Transportation Modelling. I am also certified as a Hearings Commissioner having completed the Making Good Decisions course in 2019.

13. My previous experience includes 25 years of transportation planning and engineering work. I have managed and led numerous projects related to transportation business cases, transportation research and RMA related matters for public and private sector clients.

14. I have been engaged by the Environmental Protection Authority, Auckland Council, Auckland Transport, Selwyn District Council, Queenstown-Lakes District Council, Taupo District Council, Foodstuffs South Island Limited, Ports of Auckland and Fonterra as a transportation expert witness. I have

extensive experience working as a transportation planner and modeller in the Greater Christchurch area.

Code of conduct.

15. While this is a Council hearing, I have read the Code of Conduct for Expert Witnesses (contained in the 2023 Practice Note) and agree to comply with it. Except where I state I rely on the evidence of another person, I confirm that the issues addressed in this statement of evidence are within my area of expertise, and I have not omitted to consider material facts known to me that might alter or detract from my expressed opinions.

Scope of evidence

16. My statement of evidence addresses the following matters:

    (a) Review of PPC23 ITA Report;

    (b) Review of responses to the request for further information; and

    (c) Review of transport-related matters raised through submissions.

17. I address each of these points in my evidence below.

REVIEW OF INTEGRATED TRANSPORT ASSESSMENT REPORT

18. Some of the key transport-related aspects of the proposal are as follows:

    (a) The proposal seeks to rezone from Specific Purpose (Golf Resort) Zone to a Residential New Neighbourhood Zone. This would enable approximately 800 dwellings, and includes community hub / commercial area to be developed.

    (b) Three external Collector Road intersections are proposed, to Spencerville Road (north), Turners Road (west) and Teapes Road (southwest). There is no direct property access to Turners Road or Spencerville Road

    (c) The 800 dwellings are assumed in the ITA to generate 720 two-way vehicle trips in peak hour and 6,560 per day which corresponds to 0.9 trips per dwelling in peak hour and 8.2 trips per day. I consider these rates to be in line with industry best practice but note that there is no trip generation assumed for the community hub / commercial area. The

ITA states that trip generation was not considered because it is intended to serve the local area only.

(d) Several infrastructure upgrades are proposed as part of the Plan Change including:

(i) Turners Road From Spencerville Road to Marshland Road is proposed to be upgraded to a 6.0m carriageway width 0.5m sealed shoulders.

(ii) Teapes Road is proposed to be upgraded to 5.5m wide carriageway with 0.5m sealed shoulders when development commences that gains access via Teapes Road.

(iii) The Turners Road / Teapes Road intersection is also proposed to be upgraded, including squaring up the intersection.

(iv) Marshland Road / Turner Road intersection to improve capacity (with dedicated left and right turn lanes after 700 lots are created).

(v) Turners Road / Spencerville Road intersection – land is to be vested for sight line improvements to the east along Spencerville Road.

(vi) Shared User Path that links the site to Ōuruhia Model School. This would follow Styx River (providing part of Council's proposed Source to Sea[1] route), travels through the Styx Loop Conservation Park with 400m of path on Turners Toad to link to the school.

(vii) Shared User Path on Lower Styx Road to link with Te Korari Street and adjacent bus services. The existing Styx River Bridge at the southern end of Teapes Road would be retained to connect to a new Shared User Path on Lower Styx Road.

19. I note that the proposed upgrades do not include frontage upgrades to Spencerville Road and Turners Road which form the northern and western boundaries of the Plan Change area. In an urban context a Plan Change of this scale and nature would usually be accompanied by frontage upgrades including consideration of parking, footpaths, provision for cyclists and the

[1] https://ccc.govt.nz/assets/Documents/Environment/Water/Vision-2000-2040-The-Styx.pdf

construction of kerb and channel. PPC23 does not propose direct access to either corridor therefore from a traffic effects perspective I do not consider that urban frontages are a requirement when considering this Plan Change in isolation.

20. However, should the immediately surrounding area (which I understand is currently zoned Rural Urban Fringe) be urbanised in the future, I would recommend frontage upgrades be provided to avoid development occurring in isolated pockets. Such upgrades would demonstrate that the area is urban in nature, may be accompanied by lower speed limits as is consistent with an urban traffic environment (and in turn would provide safer outcomes then a higher speed rural or peri-urban environment) and would improve connectivity for all modes between development areas. I note that Ms Schroder and Ms Smetham will be assessing this aspect from urban design and visual perspectives.

Vehicle access and connectivity

21. The current Outline Development Plan under the Specific Purpose (Golf Resort) zoning includes road accesses to Lower Styx Road and Spencerville Road and the Service Vehicle only access to Teapes Road. The existing ODP for the site is shown in Figure 1.

22. The proposed PPC23 ODP (refer Figure 2) proposes vehicle connections to Spencerville Road, Turners Road and the end of Teapes Road, but proposes to only provide a walk/cycle connection at the existing bridge across the Styx River to Lower Styx Road.

23. The traffic modelling undertaken by QTP and appended to the ITA estimates that 70% of traffic to/from the site will access the wider network via Turners Road then connecting to Marshland Road to the west. It is not clear from the ITA how attractive a direct connection to Lower Styx Road would be or whether this has been considered in detail.

24. I have calculated the distance from the Turners / Teapes intersection to the Marshland Rd / Lower Styx Road intersection via Turners Rd and via a direct Lower Styx Road connection and concluded that both routes are approximately 3.4km. This indicates that they would be approximately equally attractive for travel to/from Christchurch.

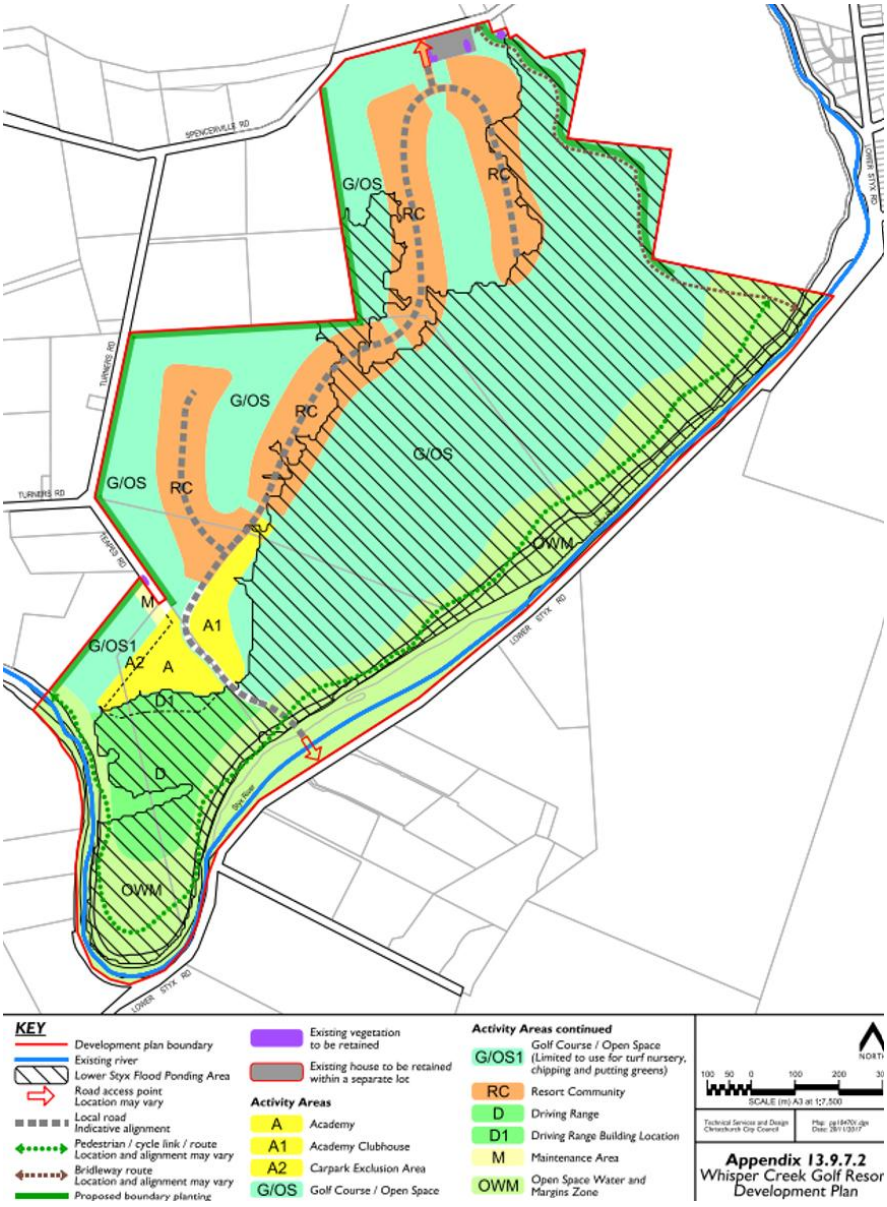


Figure 1 Specific Purpose (Golf Resort) Whisper Creek ODP[2]

[2] Source: https://districtplan.ccc.govt.nz/?docId=uRxTmAf4Rgc%3d

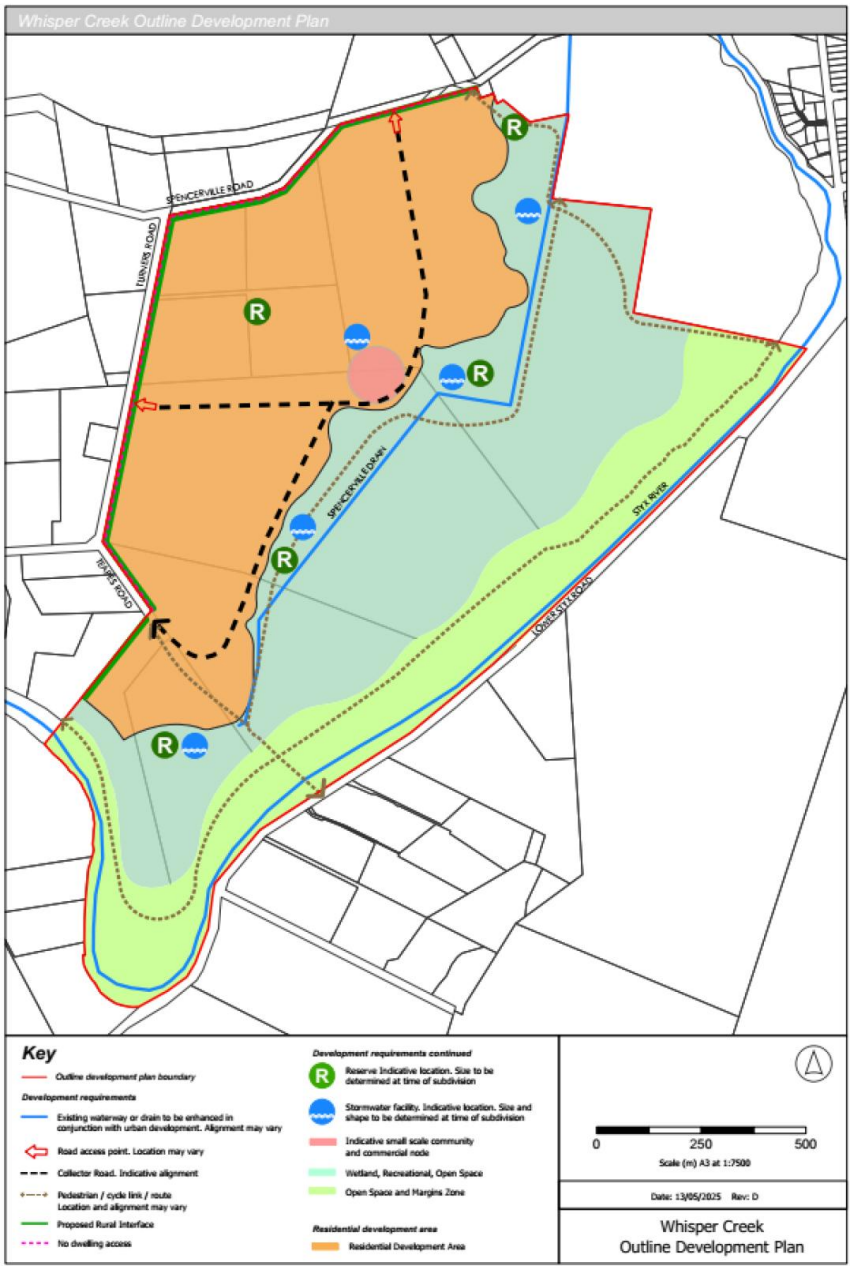


Figure 2 Plan Change 23 ODP[3]

25. There is a lack of assessment of the merits of a direct connection onto Lower Styx Road (as signalled in the current Special Purpose zone ODP in Figure 1). In my view a direct connection would have the potential to reduce traffic volumes on Turners Road including in the vicinity of Ōuruhia Model School. However I note that a new intersection on Lower Styx Road (which is a higher speed 80 kph environment compared to Turners and Marshland Road and therefore may be less safe) would be required. It is recommended that further assessment be undertaken in relation to the merits of retaining this direct connection for general traffic.

[3] Source: Notified Plan Change 23 Appendix K page 7

Walking and cycling access

26. There is currently a lack of pedestrian and cycle facilities in vicinity of the site which is not atypical given its current rural nature. The applicant proposes to construct shared paths connecting the site to the Ōuruhia Model School (the school) and along Lower Styx Road to the Prestons subdivision. I support their inclusion in provisions as part of the Plan Change.

27. I recommend two further additions to connect provide a satisfactory level of walk and cycle connectivity:

    (a) There are no walking or cycling connections to connect between the site and Spencerville settlement. Although the traffic modelling in the ITA only assumes a small quantum (3%) of residential traffic interacts with Spencerville, I consider that this connection is important as the community job / commercial centre[4] within the Site are likely to be convenient and attractive for Spencerville settlement residents where there are few amenities available. I recommend that a shared path is provided along Spencerville Road between the site access and Lower Styx Road to provide for pedestrians and cyclists. This is of primary importance for visitors from Spencerville to the community hub / commercial centre within the Site, but would also be an important recreational connection to the beach and adjacent walking and cycling tracks.

    (b) Whilst the construction of a shared path to the school is supported, it is noted that residents in the Plan Change area would need to walk or cycle to the southwest corner of the urban area, and then loop around the local recreational track down to the Styx River and back to access the Shared Path (shown by the blue arrows on Figure 3). This is not a direct and convenient connection in my view. Instead, I recommend that a shared path be formed along the length of Turners Road between the school and the Turners/Teapes intersection. This could replace the proposed (blue arrows) connection and in doing so provides a safe and direct connection as shown by the red arrow in Figure 3. The black arrow shows the portion of shared path along Turners Road as proposed - I recommend the school should be

[4] As noted on page 10 of the Section 32 report

accessed via the red and black route rather than the less direct blue and black route proposed in the application.

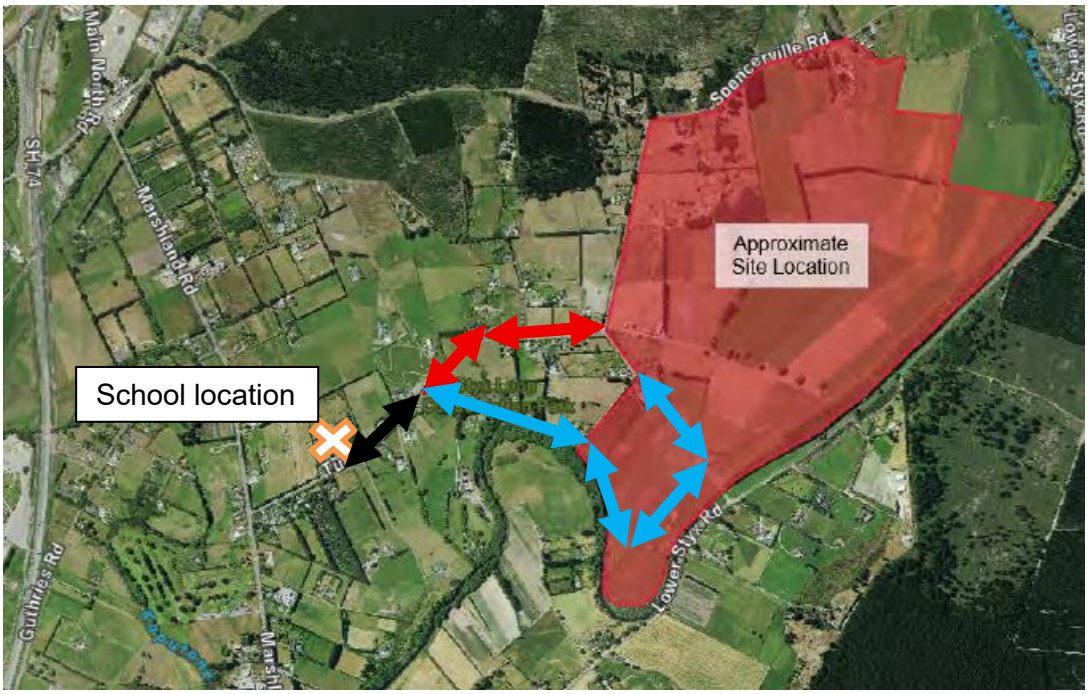


Figure 3 PPC23 site with walk and cycle connections to school (blue arrow is proposed and red arrow is recommended)[5]

Public transport access

28. The nearest public transport services are currently the 135 service which travels to the top end of Prestons subdivision. It is acknowledged that the applicant proposes building a shared path along Lower Styx Road to connect the site to the footpath and local roads at Prestons. This will provide a degree of connectivity to this existing service forming a walking and cycling connection of approx. 3km from the Turners/Teapes intersection to the current 135 service.

29. The ITA states that "*Collector Roads within the Site will be designed to accommodate bus services, should these be proposed by Environment Canterbury*". This is supported and is recommended to be annotated in the ODP. The provision of future public transport services to the Plan Change site is a matter for Environment Canterbury, and by designing to enable future bus movement through the site, and such services would not be precluded. The potential future routes shown in figure 27 of the ITA is a logical extension of the existing network.

[5] Source is figure 1 of the Novo Group ITA

Network effects

30. I have reviewed the traffic modelling presented in the ITA and have concluded that this is generally undertaken in line with best practice. Notably the modelling demonstrates that the Marshland / Turners intersection will require upgrading before full development of the site is realised. The proposed addition of a left turn lane on the Turners Road approach is supported and appears achievable within the current road reserve. The addition of the left turn lane reduces Turners Rd right turn out delays from 57 to 28 seconds and left turn out delays from 35 to 15 seconds.

31. Although I support the upgrade it is not entirely clear why the threshold of 700 lots has been selected for the intersection upgrade. Related to this, there is little information available in relation to the performance of the Marshland / Main North / Spencerville Road intersection. For northbound traffic from the site in the morning peak, a right turn at one of Turners or Spencerville Roads is required, therefore in my view the operation of one intersection cannot be fully understood in isolation.

32. It is understood that 23-42% (and an average of 28%) of the traffic associated with the Site travels along Spencerville Road[6] and the majority of these in the morning peak period are turning right out of Spencerville Road onto Main North Road. The Plan Change generates 720 two-way vehicle movements in the peak hour, 28% of which represents an additional 202 vehicles per hour on Spencerville Road and travelling through this intersection (or one vehicle every 18 seconds). The majority of these movements in the morning peak hour will be through movements or right turns out of Spencerville Road. Figure 6.4 from ITA Appendix 1 shows 140 such movements in the morning peak hour.

33. This means that the number of through and right turning vehicles from Spencerville Road will be considerably higher than the number modelled at Turners Road. In my view there is insufficient analysis to understand the impacts of the Plan Change traffic on the operation of the Marshland / Main North / Spencerville Road intersection.

34. The results of an assessment of the traffic impacts on the Marshland / Main North / Spencerville Road intersection, may have a bearing on the timing or

[6] Refer Table 5.1 from ITA Appendix 2

need to upgrade the Marshland / Turners Road intersection, especially if a need to upgrade the Marshland / Main North / Spencerville Road intersection is established.

35. The modelling indicates a very small amount of interaction with Spencerville (3% of all movements or approx. 20 per hour) however this is based on residential travel demand only. I note there is a two-way one-lane bridge to the east of the site on Spencerville Road. The Plan Change will add approximately one vehicle every three minutes across this bridge and in my view this small increase is very unlikely to result in any safety or operational concerns. However, the traffic modelling in the ITA did not consider traffic generation of the community hub / commercial centre as it is intended to serve the local area only. Should these facilities be established it is unclear to what extent this may increase traffic volumes across the bridge which has not been assessed.

36. I note from my site visit that there are no road markings or signage at the Spencerville / Lower Styx Road intersection to establish which intersection leg has priority (see Figure 4).



Figure 4 Spencerville Rd approach to Lower Styx Road

37. This creates a potentially confusing scenario for traffic approaching from Spencerville Road and is recommended to be addressed through the installation or appropriate signage and road marking. I consider this to be a matter which should be addressed by Council.

Road safety effects

38. The crash history of the local network is presented in paragraphs 17-19 of the ITA report. This identifies several crash trends, specifically:

    (a) Loss of control crashes along Spencerville Road – citing anti-social activity as a potentially contributing factor (ice and speed are recorded factors),

(b) Failure to give way at the Marshland / Main North / Spencerville Road intersection – and notes that these generally occurred prior to the Christchurch Northern Corridor opening which resulted in a step change reduction in traffic volumes on Marshland Road (in April 2020 13,267 vehicles per day[7] has reduced to 8,345 vpd[8] by 2022).

39. These explanations for the crash trends are acknowledged. However it is noted that 28% of the traffic associated with the Plan Change is anticipated to access the wider network via Spencerville Road to the west. Table 8 of the ITA estimates that total traffic generation of the site is 6,560 vehicles per day (vpd), therefore the increase in traffic on Spencerville Road is an approx 1,837 vpd. The current traffic volume on Spencerville Road is noted in the ITA to be 534-1,066 vpd, so the traffic volume is anticipated to double or triple (increase by up to 200%) when the site is fully developed.

40. This is considered a step change increase in the level of activity along the corridor so there is some likelihood that the safety performance will worsen as a result of the increase in traffic.

41. I have undertaken an assessment of the level of risk along the corridor both with and without the Plan Change traffic using the Infrastructure Risk Rating (IRR) model. This is a "*a proactive method for assessing road safety risk developed by NZ Transport Agency Waka Kotahi*" [9]. The model enables the number of predicted Death and Serious Injury (DSI) crashes to be calculated over a five-year period based on a selection of road environment parameters including daily traffic volume. By changing the traffic volume in the model, the estimated change in DSI crashes can be modelled. The results of my assessment are including in Table 1.

Table 1 Spencerville Road IRR Road Safety Risk Analysis

Parameter	*Spencerville Rd W of Railway*	*Spencerville Rd W of Railway*	*Spencerville Rd E of Railway*	*Spencerville Rd E of Railway*
	Current	With PCP23	Current	With PPC23
IRR Score	2.49		1.78	
Road length (km)	0.28		1.94	
Daily Traffic (vpd)	*1050*	2887	790	2,627
Predicted DSI (5-Yr)	0.094	0.257	0.271	0.902
Change in DSI (5-year period)		**0.163**		**0.631**

[7] https://ccc.govt.nz/transport/improving-our-transport-and-roads/traffic-count-data/links-traffic-counts-dashboard
[8] Table 3 of ITA
[9] https://www.nzta.govt.nz/resources/infrastructure-risk-rating-manual

42. The analysis demonstrates that over a five year period the total number of DSI along the corridor (added up both sides of the railway line) increases from 0.365 to 1.159 DSIs. In my view this is a substantial increase in the road safety risk and associated number of death or serious injury crashes along the corridor. I anticipate that upgrades to the corridor may be required to improve the safety performance (or at the very least, ensure that it does not deteriorate as a result of the Plan Change).

43. The Spencerville Road corridor currently has an approx. 6m wide carriageway with grass shoulders. Noting the increase in usage I have considered the appropriateness of the carriageway with future traffic volumes in the order of 2,500-3,000 vpd.

44. Standards New Zealand have published Land Development and Subdivision Infrastructure Standards (NZS 4404:2010) which include road cross sections in a variety of urban and rural contexts. I consider that the future Spencerville Road environment (that is if the Plan Change site were fully developed) is best represented by Figure E8 from Table 3.2 of NZS 4404:2010. I have copied the corresponding cross section details in Figure 5 below with E8 details highlighted in the red box.

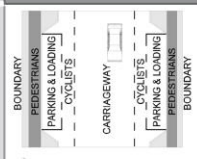
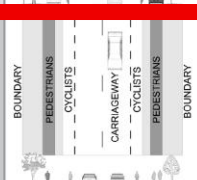
PLACE CONTEXT			DESIGN ENVIRONMENT				LINK CONTEXT					TYPICAL PLAN AND CROSS SECTION	FIGURE NUMBER
Area	Land use	Local attributes	Locality served	Target operating speed (km/h)	Min. road width (m)	Max. grade	Pedestrians	Passing, parking, loading, and shoulder	Cyclists	Movement lane (excluding shoulder)	Classification	SEE APPENDIX E FOR LARGER VERSION OF FIGURES	
Notes	See 3.2.4, table 3.1 & 3.3.1.6	See table 3.1	See table 3.1	See 3.3.5	See 1.2.2, 3.3.1.9, & 3.4.16		See 3.3.11	See 3.3.6 & 3.3.1.4	See 3.3.1.5, 3.3.7, & 3.3.11.2	See 1.2.2, 3.3.1.1, 3.3.1.2, 3.3.1.3, 3.3.1.10, 3.3.11.3	See 3.2.4.2 & 3.3.16 (Typical max. volumes)		
Rural (3.3.1.7, 3.3.1.8, & 3.3.1.9)	Make and move	Access to office and education	1 to 200 lots	up to 60	20	10%	1.5 m each side	Parking and loading may occur in movement lane or be separate and recessed. Refer clause 3.3.6. Total shoulder 1.0 m, sealed shoulder 0.5 m	On sealed shoulder where it is a local authority defined cycle route	5.5 - 5.7	Local road (~ 1,000 vpd)		E7
	All other situations (where not specified elsewhere)	All (serving land uses not specified elsewhere in this table)	-	up to 100	20	10%	Separate from the carriageway, 1.5 m each side	Total shoulder 1.5 m, sealed shoulder 1.0 m	On sealed shoulder where it is a local authority defined cycle route	5.5 - 5.7	Connector/ collector (~ 2,500 vpd)		E8

Figure 5 NZS 4404:2010 Table 3.2 rural cross-section excerpt

45. This standard recommends a 5.5-5.7m wide carriageway with sealed shoulder of 1.0m. This would require a sealed width of 7.5-7.7m. Based on my assessment using online resources I have established the sealed component of the carriageway to vary in width in the range of 6-7m with generous grass shoulders. Noting my concerns in relation to the increased crash risk, I recommend that further consideration be given to the design standard of the Spencerville Road corridor to determine if localised or more widespread upgrades are required.

46. I note that the Standard also refers to pedestrian and cycle (only if on a defined cycle route) facilities. In this instance I do not consider these are desirable on Spencerville Road to the west of Turners Road as they would not connect to other pedestrian or cycle infrastructure. The shared paths I have recommended to connect directly to the school and Lower Styx Road, coupled with the applicant's proposed shared path to connect to Preston's subdivision provide, in my opinion, satisfactory walk and cycle connectivity to the wider network.

47. The Spencerville Road corridor includes a rail level crossing located approx. 250m to the west of the Marshland Road intersection. I observed that there are bells in operation and advance signage but no barrier arms. I would anticipate with the anticipated increase in traffic resulting from the Plan Change, barrier arms and potentially other safety features may be required to maintain the safe operation of the level crossing.

48. I recommend that a Level Crossing Safety Impact Assessment (LCSIA) be undertaken in line with Kiwirail guidance[10]. The guidance states (on page 7) "*a new facility installed nearby to a rail corridor that would likely increase the cycling / pedestrian / vehicle volume over a level crossing location, would constitute a 'change in use' activity for the crossing location and require an LCSIA*."

49. I recommend an LCSIA should be undertaken prior to the occupation of development in the Plan Change site, and any improvements identified through the LCSIA (such as the installation of barrier arms) should be undertaken at the expense of the applicant. This requirement should be reflected in the planning provisions.

STRATEGIC PLANNING FRAMEWORK

50. The single transport-related RFI matter requested (by Mr McGonigal, CCC Transport Network Planner prior to my involvement) a review of the Plan Change against several policies and plans, specifically:

    (a) Canterbury Regional Policy Statement (CRPS), including the relevant transport objectives and policies in Chapter 5 and 6.

    (b) Greater Christchurch Spatial Plan (GCSP).

[10] https://www.kiwirail.co.nz/assets/Uploads/documents/Level-Crossing-Risk-Assessment-Guidance.pdf

(c) Greater Christchurch Transport Plan.

(d) Canterbury Regional Land Transport Plan 2024-2024.

(e) Ōtautahi Christchurch Future Transport 2024–54.

51. The RFI response directed Council to the ITA and provided no additional context other than stating the "*application included a detailed assessment against the relevant strategic policy framework that manages urban growth, urban form, and the requirements of a 'well-functioning urban environment', with this assessment including consideration of transport matters and connectivity*". I have checked the Assessment of Environment Effects section 32 report and note that the CRPS and GCSP are assessed but the other three plans are not referenced. The objectives and policies of the Christchurch District Plan are assessed in Appendix J of the Section 32, but does not specifically address transport objectives and policies.

Christchurch District Plan

52. Under section 7.2 of the Christchurch District Plan two objectives (supported by a number of policies) are stated as follows:

7.2.1 Objective - Integrated transport system for Christchurch District

a. An integrated transport system for Christchurch District:

- *i. that is safe and efficient for all transport modes;*
- *ii. that is responsive to the current recovery needs, future needs, and enables economic development, in particular an accessible Central City able to accommodate projected population growth;*
- *iii. that supports safe, healthy and liveable communities by maximising integration with land use;*
- *iv. that reduces dependency on private motor vehicles and promotes the use of public and active transport;*
- *v. that is managed using the one network approach.*

7.2.2 Objective - Adverse effects from the transport system

a. Enable Christchurch District's transport system to provide for the transportation needs of people and freight whilst managing adverse effects from the transport system.

53. In my review of the Integrated Transport Assessment report I have raised concerns in relation to gaps in walking and cycling connectivity, a lack of safety assessment along the Spencerville Road corridor (including the level

crossing) and a lack of assessment of the performance of the Marshland / Main North / Spencerville Road intersection (Chaney's Corner).

54. I consider that without these matters being satisfactorily resolved that it is unclear whether the plan change is consistent with the objectives. Specifically, in my view:

(a) additional assessment of Spencerville Road (mid-block) and the Spencerville / Main North / Marshland Road intersection is required to demonstrate the safe and efficient operation of the transport network, and safe and direct infrastructure is required for pedestrians and cyclists to connect to the Ōuruhia Model School and Spencerville settlement (7.2.1 (a)(i)),

(b) without the aforementioned pedestrian and cycling infrastructure, active transport is not satisfactorily promoted (7.2.1 (a)(iii))

(c) more assessment is required to demonstrate that adverse effects are suitably identified, and if necessary managed or mitigated (7.2.2 (a)).

Canterbury Regional Policy Statement (CRPS)

55. The key transport-related objective from the CRPS is objective 5.2.3 Transport network (Wider Region) and is stated as follows:

"*A safe, efficient and effective transport system to meet local regional, inter-regional and national needs for transport, which:*
1. supports a consolidated and sustainable urban form;
2. avoids, remedies or mitigates the adverse effects of transport use and its provision;
3. provides an acceptable level of accessibility; and
4. is consistent with the regional roading hierarchy identified in the Regional Land Transport Strategy."

56. The concerns raised in relation to the safe and efficient operation of the transport network for all modes, and the potential for unidentified adverse effects in the assessment against the CDP objectives, also apply to the CRPS objective 5.2.3. I consider that with reference to "*provides an acceptable level of acceptability*" this is met with respect to public transport accessibility through the provision of a shared path connection along Lower Styx Road to existing bus services. However, I retain concerns about pedestrian and cycle accessibility in closer proximity to the site which would

be resolved through the provision of direct and safe infrastructure connecting to the school and Spencerville settlement.

Greater Christchurch Spatial Plan

57. There were several other plans mentioned in Council's RFI which have not been assessed.

58. The Greater Christchurch Spatial Plan includes Opportunity 6 as follows:

"Prioritise sustainable and accessible transport choices to move people and goods in a way that significantly reduces greenhouse gas emissions and enables access to social, cultural and economic opportunities."

59. This is assessed in the Section 32 report and whilst I generally agree with this assessment including with respect to public transport provision, I remain of the view that a direct pedestrian and cycle connection to the School and Spencerville settlement are required to prioritise alternative transport choices. I also envisage that these connections would contribute to reducing transport related emissions as with greater uptake of walking and cycling there would be less reliance on driving.

Canterbury Regional Land Transport Plan 2024-34

60. The Regional Land Transport Plan 2024-2034 has five transport investment priorities as follows: *"Create a well-maintained network; Manage risk of exposure to extreme events; Support and develop connected public transport and active transport networks; Implementing safer systems (Road to Zero); and Support and develop freight systems connecting to air, rail, and sea".*

61. I have made several recommendations arising from my transport review that include providing improvements to the connectivity of the active transport network, and undertaking further safety assessment of the Spencerville Road corridor including the intersection with Marshland / Main North Road and a future LCSIA at the level crossing.

62. I note the priority in relation to exposure to extreme events. This is a matter which I address later in my response to submissions relating to tsunami evacuations.

REVIEW OF SUBMISSIONS

63. I have extracted the key themes from transport-related submission points and discuss each in turn below.

Vehicle movements and congestion

64. There are multiple submissions relating to the operation of the transport network including concerns in relation to congestion. The ITA presents a traffic modelling assessment to understand the network effects of traffic generated by PPC23. I have reviewed the modelling included as Appendix A to the ITA and conclusions drawn in the ITA and discussed my findings in paragraphs 30-37.

65. Whilst I am generally satisfied with the modelling undertaken, I have recommended that more assessment of the Marshland / Main North Road / Spencerville Road is required to understand the impacts of the growth in traffic along Spencerville Road seeking to travel through or turn right at this intersection. I have also recommended that further consideration be given to establishing a direct vehicular connection to Lower Styx Road from the Plan Change site, which has the potential to change travel patterns including reducing traffic volumes past the School.

Network Safety

66. There were a number of submissions raising concern in relation to road safety. These generally sought for more assessment or for no development until suitable transport upgrades were in place, and included concerns about the:

    (a) safety of horse-riders in the vicinity.

    (b) narrow Lower Styx Road corridor.

    (c) one-lane Spencerville Rd bridge.

    (d) safety of Chaney's corner intersection.

    (e) safety of Spencerville and Turners Roads including for biking and for access to Ōuruhia Model School.

67. I have observed horse-riders on the grass berm in the vicinity and note that this is a matter addressed in the New Zealand road code, relying on the courtesy of drivers. Should the area become increasingly urbanised there

will be an increase in traffic and therefore risk associated with vehicles passing horses in the berm. It is also noted that with proposed widening of carriageways there would be less berm available for horses. Additional signage could be installed to increase awareness of horses in the vicinity.

68. As is currently proposed, the Plan Change is unlikely to add traffic to Lower Styx Road as there is no direct vehicle connection. I also consider that the one-lane Spencerville Road bridge is unlikely to require upgrades in relation to vehicular safety. However I have made recommendations in relation to providing a shared path on the eastern extent of Spencerville Road which would require consideration of pedestrian and cycle safety in vicinity of the one-lane bridge. This may take the form of 'share the road' signage with appropriate advisory speed limits across the bridge and this could be resolved through future engineering approval and safety audit processes.

69. The safety record of the Chaney's corner (ie the Marshland Road / Main North Road / Spencerville Road intersection) has markedly improved in recent years as a result of changes in posted speed and reductions traffic along Marshland Road when the Christchurch Northern Corridor (CNC) opened. However, the Plan Change increases the number of conflicts at this intersection - I have recommended more assessment be undertaken by the proponent to understand the safety effects.

70. I have similarly raised concerns in relation to road safety along Spencerville Road between the site access and Marshland Road and have recommended further assessment be undertaken in this regard. I have highlighted the lack of safe and direct provision for pedestrians and cyclists accessing the school via Turners Road and Spencerville settlement via Spencerville Road (east of the site) and recommended that shared paths be provided in both instances.

Lack of Public Transport

71. I address public transport provision in paragraphs 28-29 and have concluded that the proposal to provide walk and cycle connectivity to connect to existing services via Lower Styx Road coupled with designing to accommodate future services (should Environment Canterbury seek to provide them) is satisfactory.

Lack of Lower Styx Road Access

72. Several submissions recommend a vehicular connection to Lower Styx Road including citing concerns about increased traffic flows along Spencerville and Turners Roads. I consider this to be a matter which has not been addressed in the ITA supporting the Plan Change. I have recommended further consideration be given to establishing a direct vehicular connection to Lower Styx Road from the Plan Change site, which has the potential to change travel patterns including reducing traffic volumes past the School.

Traffic lights

73. Two submissions raise questions regarding whether traffic signals are required including whether they are needed at Chaney's corner. I have reviewed the modelling assessment of the intersection of Marshland Road / Turners Road intersection and am satisfied that signals are not required at that location as the recommended infrastructure upgrade proposed to be delivered through the Plan Change is an appropriate engineering solution.

74. However, I have recommended more assessment be undertaken at Chaney's corner on the basis that the traffic modelling has recognised high through and right turn demands in the morning peak period. The traffic assessment has not demonstrated that impact of this demand on the operation or safety of this intersection.

Tsunami evacuation risk

75. Multiple submissions raise concerns relating to congestion which may occur during a tsunami evacuation. One submitter requested updated tsunami evacuation travel time modelling and there was also a specific mention of the one-lane bridge on Spencerville Road too.

76. I note the site is observed to be located within the yellow evacuation zone based on CCC classifications (refer Figure 6). The yellow classification description is "*This is an area that is least unlikely to be affected by tsunami but still possible in a very large tsunami. It's unlikely you'll need to leave this zone in your lifetime*". CCC recently undertook a traffic modelling exercise[11] which sought to understand the evacuation times for the New Brighton suburb. The event considered was an earthquake in the Hikurangi

[11] https://ccc.govt.nz/assets/Documents/The-Council/Request-information/2024/LGOIMA-Pages-Road-Bridge-Renewal-Traffic-Modelling.pdf

subduction zone with an evaluation target time of 1 hour https://ccc.govt.nz/services/civil-defence/tsunami-evacuation-zones-and-routes, being the anticipated length of time between an earthquake and tsunami.

77. I have undertaken a coarse assessment based on every household evacuating using one vehicle (800 vehicles) over the course of a one-hour period. Noting there are two exit roads (Turners Road and Spencerville Road) this equates to approx 400 vehicles per road on an evacuation rate of one vehicle at least every 9 seconds on each corridor. Typically, vehicles can comfortably enter traffic streams in 3-4 second intervals, so I would expect that theoretically the Whisper Creek development of 800 households could comfortably be evacuated within an hour. The situation becomes more complicated as Whisper Creek traffic joins other traffic seeking to head inland but the provision of two connections from the Plan Change site to the wider arterial network is considered satisfactory to enable timely evacuation of the immediate area to occur. Traffic would no longer be located in the yellow zone when they get to (or are on the approach to) Marshland Road as shown in Figure 6.

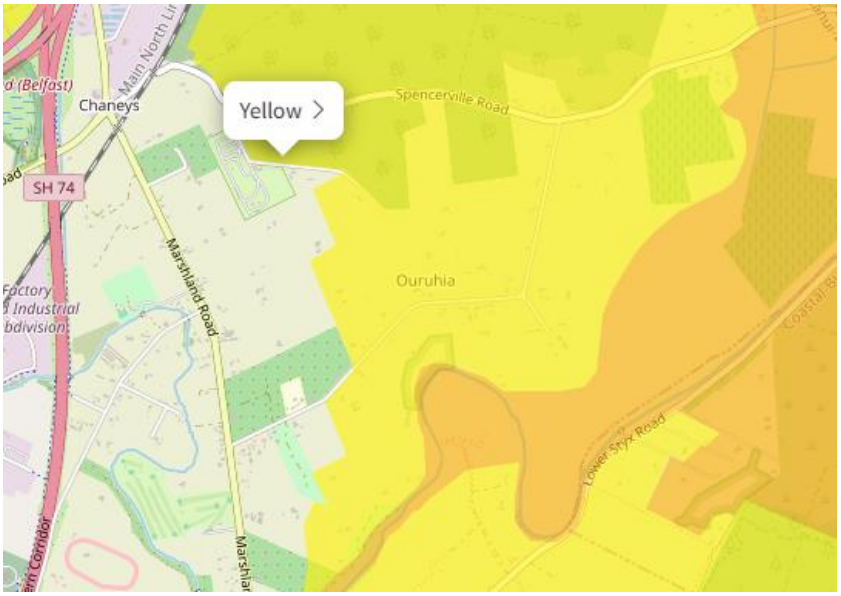


Figure 6 CCC tsunami evaluation zones in relation to Site

78. I further note that in the event of a tsunami residents are extremely unlikely to travel east and exacerbate any congestion on the Spencerville Road one-lane bridge which lies to the east of the site. Any traffic from Spencer Park would have priority over Plan Change site traffic as it passes the intersection of Spencerville Road and the site access and the Turners Road intersection.

Insufficient sight lines

79. A submission received from the neighbouring property directly opposite the Spencerville Road access raises concerns about visibility at this location. I have reviewed the assessment provided in the ITA report and note these have been designed to achieve the minimum 151m sight distance which based on industry guidance[12] is suitable at a 70km/h design speed (where the design speed is 10km/h faster than posted speed).

80. The visibility to the west could be impeded by future fences or vegetation along the Plan Change site boundary (see highlighted yellow section on Figure 7). It is recommended that a small section of the property be vested as road reserve to maintain the minimum sight distance.

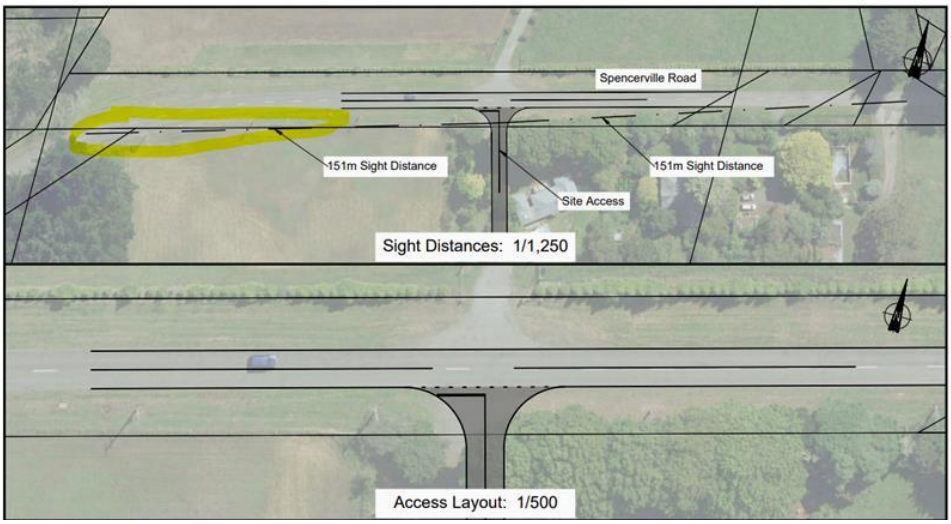


Figure 7 Property boundary visibility risk (source: ITA Appendix 3)

Level crossing at Chaney's corner

81. Two submissions raise concerns about limited visibility or lack of barriers at the Spencerville Road level crossing located to the east of Chaney's corner. I have considered the safety of the current level crossing in paragraphs 47-49 and concluded that the anticipated increase in traffic associated with the plan change will increase risk at this location. I have recommended that a LCSIA in accordance with Kiwirail guidance be undertaken prior to occupation of the Plan Change site, to establish whether barrier arms or other safety features are required.

[12] Austroads Guide to Road Safety Part 4A Table 3.2

Transport-related Carbon emissions

82. Two submissions raise the issue of carbon emissions with one requesting the provision of a transport emissions and vehicle kilometres travelled (VKT) analysis. There is little guidance in my industry around what level of emissions or VKT may be acceptable and what is not. Almost invariably for residential developments, any development will increase vehicle-related emissions and VKT on the transport network.

83. When considering these matters I focus on whether a development has a suitable level of provision such that residents have mode choice and are not entirely reliant on private vehicle use. In the context of PPC23 I note that:

    (a) Some provision for walking and cycling is proposed through the delivery of shared paths. I have proposed further connectivity external to the site to provide genuine mode choice for residents accessing surrounding areas including the school and Spencerville settlement.

    (b) The site is designed with future public transport services in mind, noting that the provision of public transport is a matter for Environment Canterbury.

    (c) A small commercial centre is proposed of a scale which would provide for future residents, avoiding the need for longer trips for 'neighbourhood centre'-style goods and services.

    (d) A Plan Change of this scale would typically include an assessment of the accessibility to essential services for the development. The Christchurch City Council ITA guidelines[13] sets out a methodology for undertaking a multi-modal accessibility assessment which is a helpful method to understand how car-dependent a development proposal is. This assessment has not been provided.

84. Accordingly, I recommend that an accessibility assessment in line with CCC ITA guidelines be undertaken.

CONCLUSIONS

85. I have reviewed the transportation assessment and considered the effects of the PPC23 application. I retain concerns in relation to unmitigated or

[13] Refer pages 11-12 of https://www.ccc.govt.nz/assets/Documents/Consents-and-Licences/resource-consents/ITAGuidelines.pdf

potentially unidentified safety and efficiency effects. I recommend the following:

(a) Update planning provision 8.10.3X.D(2)(d) to provide a direct pedestrian and cycle corridor connecting the site between Teapes Road and the Ouruhia Model School via Turners Road.

(b) Add a further planning provision 8.10.3X.D(2)(f) and update 8.10.3X.C(4) to provide a pedestrian and cycle corridor along Spencerville Road to connect the site to the intersection of Lower Styx Road and Spencerville Road.

(c) Add a further planning provision requiring a Level Crossing Safety Impact Assessment (LCSIA) to be undertaken in line with Kiwirail guidance on the Spencerville Road level crossing to the west of the site, and any improvements identified through the LCSIA (such as the installation of barrier arms) should be undertaken prior to occupation of the Plan Change site.

(d) Update the planning provisions or add advice notes to the ODP to include for other proposed infrastructure upgrades identified in the ITA including:

    (i) Turners Road From Spencerville Road to Marshland Road is proposed to be upgraded to a 6.0m carriageway width 0.5m sealed shoulders. This is briefly noted in 8.10.3X.D(3)(c) but is lacking in detail.

    (ii) Teapes Road is proposed to be upgraded to 5.5m wide carriageway with 0.5m sealed shoulders when development commences that accesses Teapes Road. This is absent from provisions.

    (iii) The Turners Road / Teapes Road intersection including squaring up the intersection. This is absent from provisions.

    (iv) Turners Road / Spencerville Road intersection – land is to be vested for sight line improvements to the east along Spencerville Road. This is absent from provisions.

(e) Undertake a safety assessment along the Spencerville Road corridor including the intersection of Marshland / Main North / Spencerville

Road, and identify any mitigation required to offset increasing road safety risk as a result of Plan Change traffic.

(f) Undertake Sidra Intersection modelling of the Marshland / Main North / Spencerville Road intersection to determine if further works are required to accommodate Plan Change traffic.

(g) Further consideration be given to establishing a direct vehicular connection to Lower Styx Road from the Plan Change site, which has the potential to change travel patterns including reducing traffic volumes in the vicinity of the School.

(h) Assess the extent to which the Plan Change site along the northern property boundary (if established with fences or vegetation in the future) could potentially impede sight distances for traffic exiting the northern access, and if required vest this land as road reserve.

(i) Undertake a multi-modal accessibility assessment for the full Plan Change site in line with CCC ITA guidelines.

Date: 20 April 2026

David Smith

APPENDIX 12 – REVIEW OF PPC23 AND SUBMISSIONS RELATED TO GEOTECHNICAL MATTERS BY NEIL CHARTERS, PRINCIPAL GEOTECHNICAL ENGINEER AT ENGEO

BEFORE INDEPENDENT HEARING COMMISSIONERS IN CHRISTCHURCH

TE MAHERE Ā-ROHE I TŪTOHUA MŌ TE TĀONE O ŌTAUTAHI

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the hearing of submissions on Private Plan Change 23 Whisper Creek, Spencerville to the Christchurch District Plan

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STATEMENT OF PRIMARY EVIDENCE OF NEIL JAMES CHARTERS ON BEHALF OF CHRISTCHURCH CITY COUNCIL

Dated: 14 April 2026

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EXECUTIVE SUMMARY

1. My full name is Neil James Charters. I am employed as a Principal at ENGEO. I have been employed by ENGEO in Christchurch since September 2010.

2. I have prepared this statement of evidence on behalf of the Christchurch City Council (the **Council**) in respect of matters arising from the submissions and further submissions on Private Plan Change 23 Whisper Creek, Spencerville to the Christchurch District Plan (the **District Plan**; **PPC23**).

3. This statement of evidence describes my opinions on the adequacy of the geotechnical report set out in Appendix C of the PC23 application.

4. The land is subject to liquefaction hazard, but not to a degree substantially greater than other areas of Christchurch, and likely within the realms of what can be mitigated using relatively standard geotechnical techniques.

5. I have highlighted a number of items that the applicant's expert should consider as part of this process in order to make their application more robust. The key item that is missing is an assessment of natural hazard risk as described in the new National Policy Statement on Natural Hazards. It is entirely appropriate that Landtech did not complete this in their reporting, but I recommend it is completed as part of the proponent's evidence. The assessment required judgement of likelihood and consequence of natural hazard and is appropriately done by the proponent rather than the consenting authority.

6. I have not relied upon others in forming these opinions.

INTRODUCTION

7. In preparing this evidence I have reviewed Landtech's geotechnical assessment provided as Appendix C to the Plan Change application.

8. I am authorised to provide this evidence on behalf of the Council.

Qualifications and experience

9. I hold the qualifications of a Master of Civil Engineering (Geotechnical – awarded with Distinction).

10. I have been practicing geotechnical engineering in Christchurch for over 20 years and have overseen numerous land development and infrastructure projects.

11. I am a Chartered Professional Engineer with a practice area of Geotechnical Engineering.

Code of conduct

12. While this is a Council hearing, I have read the Code of Conduct for Expert Witnesses (contained in the 2023 Practice Note) and agree to comply with it. Except where I state I rely on the evidence of another person, I confirm that the issues addressed in this statement of evidence are within my area of expertise, and I have not omitted to consider material facts known to me that might alter or detract from my expressed opinions.

Scope of evidence

13. My statement of evidence addresses the following matters:

    (a) Engineering Geological Model (specifically the landforms and groundwater);

    (b) Liquefaction Assessment; and

    (c) Consideration of specifics of the proposed development.

14. I address each of these points in my evidence below.

15. The scope of my evidence does not include stormwater disposal, flooding or tsunami hazards. These need to be assessed by others as part of the application.

ENGINEERING GEOLOGICAL MODEL

16. Landtech completed a supplementary ground investigation to extend their knowledge of ground conditions beyond that gleaned from publicly available data. The total site area is approximately 170 hectares, and they have a total of 19 investigation points (11 Cone Penetration Tests (CPTs) and 8 Boreholes). This is a small amount of data on which to characterise a large area, and is somewhat lower than required in MBIE's recommended investigation density (Table 2.1 of Module 2), which would suggest that around 50 investigation points are required. However, the development area in this case is only approximately half of the site area and thus a total

of around 30 points would be required. Under the circumstances of relatively well known geology, I consider the investigation density marginally acceptable for current purposes, but further investigations will be required as part of the subdivision consent process, should the rezoning be supported.

17. The background section of the report states that the site is listed on Environment Canterbury's Listed Land Use Register as it may have had past landfilling activities. Against this background, a thorough review of historic aerial photographs to assess where this activity may have occurred would be prudent as part of engineering geological characterisation of the site.

18. Landtech have characterised the ground conditions with a specific focus on the CPT results. They have not presented an engineering geological model for the site based on landforms, as is recommended by the International Association of Engineering Geologists. Of particular note is the slope that separates the development area in the western part of the site from the low lying area in the eastern part of the site. This is referred to as a terrace in their conclusion, but no further description is provided in the report. I recommend that they consider this slope in more detail and describe elements such as its height, location, gradient and likely geomorphological formation in order to assess its impact on the proposed development.

19. The Landtech assessment of groundwater is limited. In Section 7.1 they describe two different groundwater levels of the site, but then present an average groundwater level without justifying whether this applies to the whole site, or the development area. Based on their Figure 3 showing groundwater level, it seems likely that they have significant conservatism in their estimation of 0.5 m groundwater depth in the development area. I recommend they consider this further and provide a range of groundwater levels for different parts of the site.

20. Landtech do not discuss how climate change or sea level rise may affect the groundwater level.

21. It is also very important to understand the variability in groundwater depths as if the site is indeed underlain by groundwater at 0.5 m depth then stormwater disposal will be extremely challenging. While outside the scope of my evidence, it is important that the impact of high groundwater levels on

stormwater disposal options is assessed as part of the plan change application process.

22. There is no discussion of slope instability hazard related to the slope that separates the upper and lower parts of the site. Depending on their engineering geological model of the site, the slope may be underlain by liquefiable soils and may be subject to loss of support during earthquakes. While not an insurmountable problem for the development, this may require a setback zone near the top of the slope where development is prohibited. This is not currently addressed in the Landtech report.

23. There is no assessment of hazards against the new National Policy Statement on Natural Hazards. While this was only released in December 2025, we consider it would be valuable for the applicant to complete this assessment as part of the evidence process.

LIQUEFACTION ASSESSMENT

24. Landtech have assessed liquefaction vulnerability at the return periods specified in the Building Code for Importance Level 2 structures (such as the houses that may ultimately be built on this land). For a proposal of this scale, we consider it would be worthwhile to complete a parametric analysis to assess the liquefaction vulnerability against the ground acceleration. This would provide insight as to whether there is a step change from the modest liquefaction vulnerability predicted at Serviceability Limit State (SLS) and the higher vulnerability at Ultimate Limit State (ULS). If this step change occurs close to SLS (i.e. with a return period close to 25 years), it may warrant further consideration and design of mitigation measures. Alternatively, if the step change occurs close to ULS (i.e. with a return period close to 500 years), it can probably be mitigated appropriately in the building foundations.

25. It is standard practice in Christchurch to compare the predicted liquefaction performance to the observations made during the 2010-2011 Canterbury Earthquake Sequence. While this is a rural area and may have a lower density of reports, or lower resolution aerial photographs, this would be a valuable exercise to ground truth the assessments and to provide more confidence in their reasonableness.

26. Landtech state at section 9.5 of their report that the land is “likely to be inundated with liquefaction ejecta following large earthquakes”. No detail of whether this is acceptable or what mitigation is required is offered.

27. Of the 11 CPTs completed across the site, three predicted moderate to severe, or major liquefaction vulnerability (CPTs 103994, 103995, 32129). While this may reduce with re-assessment of groundwater levels and consideration of fill to be placed, it does suggest that a reasonable portion of the site is vulnerable to significant liquefaction. Services and infrastructure that cross these areas will need to be designed accordingly. It also highlights significant variability in ground conditions that will need to be better understood as part of future more detailed investigations.

SPECIFIC ASPECTS OF THE PLAN CHANGE APPLICATION TO ASSESS

28. Given the effects (both positive and negative) of placing large volumes of fill on the ground surface on the liquefaction hazards, I consider it important that the geotechnical assessment is updated in light of the proposed earthworks plan provided as part of the application.

29. Section 10 of Landtech’s report states that their report scope excludes underground services. Where there is liquefaction hazard and high groundwater, underground services can be challenging to design and install so it is important that they are considered at this stage.

CONCLUSION

30. I consider that the land is subject to liquefaction hazard, but not to a degree substantially greater than other areas of Christchurch, and likely within the realms of what can be mitigated using relatively standard geotechnical techniques.

31. I have highlighted a number of items that the applicant’s expert should consider as part of this process in order to make their application more robust. Key items that are missing are

    a) an engineering geological model for the site, including assessment of groundwater levels; and

    b) an assessment of natural hazard risk as described in the new National Policy Statement on Natural Hazards.

32. It is entirely appropriate that Landtech did not complete b) in their reporting, but I recommend it is completed as part of this application.

33. It is also important to understand the limitations of the Landtech report in that it is largely suitable to support a first screening of geotechnical conditions for plan change but is not intended to provide enough information to support subdivision consent or the design process. Significant numbers of extra geotechnical investigations will be required at this these later stages, should the project proceed.

Date: 14 April 2026

Neil Charters

APPENDIX 13 – REVIEW OF PPC23 AND SUBMISSIONS RELATED TO ECOLOGICAL MATTERS BY DR. ANTONY SHADBOLT, TEAM LEADER BIODIVERSITY – BIODIVERSITY TEAM AT COUNCIL

BEFORE INDEPENDENT HEARING COMMISSIONERS

IN CHRISTCHURCH

TE MAHERE Ā-ROHE I TŪTOHUA MŌ TE TĀONE O ŌTAUTAHI

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the hearing of submissions on Private Plan Change 23 Whisper Creek, Spencerville to the Christchurch District Plan

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STATEMENT OF PRIMARY EVIDENCE OF DR ANTONY BRUCE SHADBOLT ON BEHALF OF CHRISTCHURCH CITY COUNCIL

Dated: 16 April 2026

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EXECUTIVE SUMMARY

1. My name is Dr Antony Bruce Shadbolt. I am employed as Team Leader – Parks Biodiversity.

2. I have prepared this statement of evidence on behalf of the Christchurch City Council (the Council) in respect of matters arising from the submissions and further submissions on Private Plan Change 23 Whisper Creek, Spencerville to the Christchurch District Plan (the District Plan; PPC23).

3. My evidence addresses the ecological characteristics of the site and the role of wet grasslands, ephemeral wetland areas and the Pūharakekenui–Styx River corridor in supporting bird species associated with Brooklands Lagoon and the wider Styx catchment.

4. While the site currently contains pastoral grassland habitats and riparian habitat used by resident and seasonal bird species, the structure planning framework associated with the proposal has the potential to provide significant ecological enhancement. In particular, through restoration of the Pūharakekenui–Styx River margins, farm drains, stormwater treatment wetlands and improved ecological connectivity.

5. Subject to appropriate design and ecological management through subsequent resource consent processes, these measures have the potential to result in ecological outcomes that are comparable to, or better than, the existing pastoral land use.

INTRODUCTION

6. My name is Dr Antony Bruce Shadbolt. I am employed as Team Leader – Parks Biodiversity. My qualifications and experience are covered below.
7. My evidence addresses the ecological characteristics of the site and the role of wet grassland, ephemeral wetland areas and the Pūharakekenui–Styx River corridor in supporting and managing indigenous bird species associated with Brooklands Lagoon and the wider Styx catchment.
8. In preparing this evidence I have reviewed:
    a. PPC23 Application, including Appendix H – Ecology and Appendix H(i) – Ecological Map;
    b. Christchurch District Plan Site of Ecological Significance site significance statement for eth Styx River (SES/LP/23; and

c. Relevant Submissions and Further Submissions.

9. I am authorised to provide this evidence on behalf of the Council.

QUALIFICATIONS AND EXPERIENCE

10. I hold the qualifications of National Diploma in Amenity Horticulture (NDH), a Bachelor of Landscape Architecture (BLA hons), and both a Masters (MForSci hons) and Doctoral Degree in Forestry Science that focused on ecological restoration, wildlife management, and wildlife behaviour in modified habitats.

11. I have been involved in ecological restoration across Ōtautahi Christchurch for more than 25 years, particularly throughout the Pūharakekenui-Styx River Catchment where I have led land protection, riparian and native forest restoration projects.

12. I have been Council's MoU delegate partner on the Styx Living Laboratory Trust for over 20 years and through my Council role and association with the Trust I have a very thorough understanding of the Pūharakekenui-Styx River catchment, its values, and the issues it faces.

CODE OF CONDUCT

13. While this is a Council hearing, I have read the Code of Conduct for Expert Witnesses (contained in the 2023 Practice Note) and agree to comply with it. Except where I state I rely on the evidence of another person, I confirm that the issues addressed in this statement of evidence are within my area of expertise, and I have not omitted to consider material facts known to me that might alter or detract from my expressed opinions.

SCOPE OF EVIDENCE

14. My statement of evidence addresses the following matters

    a) Ecological characteristics, bird species, and habitats of the site;

    b) Potential ecological effects of development; and

    c) Management considerations for bird populations.

15. I address each of these points in my evidence below.

SITE ECOLOGICAL CHARACTERISTICS

16. My description of the site characteristics is informed by a site visit, the ecological assessment prepared for the applicant, information provided through the Council's biodiversity review and RFI process, and more than 25 years involvement in Pūharakekenui–Styx River planning and development.

17. The site forms part of the wider ecological landscape associated with the Pūharakekenui–Styx River system and the nearby coastal wetland environments of Brooklands Lagoon.

18. The site is currently characterised by a combination of pastoral grassland, low-lying wet grassland areas, intermittent wetland features and willow-dominated riparian habitats associated with the Pūharakekenui–Styx River and associated drainage channels. The majority of the land is currently used for pastoral grazing, with vegetation dominated by exotic grassland species typical of grazed farmland in the Lower Styx catchment.

19. These habitats support both resident wetland birds and seasonal bird populations, particularly during autumn and winter when birds move between feeding areas and nearby wetland environments such as Brooklands Lagoon. Some bird species utilise the site opportunistically as part of wider daily or tidal movements between the lagoon, river margins and surrounding grassland habitats, while others - including paradise shelduck, pūkeko, spur-winged plovers, and herons reside at the site permanently.

20. Within this pastoral landscape there are a number of low-lying areas that experience periodic ponding or seasonal wet conditions. These areas function as ephemeral or intermittent wetlands and can provide habitat for a range of indigenous bird species, particularly waterbirds and wading birds that utilise shallow wetland environments and open grassland feeding areas. Species typically include pūkeko, paradise shelduck, mallard, white-faced heron, pied stilts, South Island pied oystercatcher, spur-singed plover and southern black-backed gull

21. The applicant's ecological assessment identifies that the riparian margins of the Pūharakekenui–Styx River and associated waterways are generally vegetated with a mix of exotic woody vegetation, including willow species and other common riparian weeds. While these areas are modified, they still support indigenous wetland plant species and also provide structural habitat and ecological connectivity along the river corridor, supporting bush bird movement and use of the wider Styx catchment. Bush bird species recorded here include bellbird, silvereye, fantail, grey warbler, shining cuckoo, kereru, NZ falcon, and NZ Kingfisher.

22. Numerous other bird species occur within the adjacent Pūharakekenui–Styx River corridor. This river corridor forms part of a wider ecological network that supports

both waterbirds and terrestrial bird species and provides an important movement corridor through the lower Styx catchment.

23. As well as species listed in paragraphs 19 - 21 above, waterbirds using the Pūharakekenui–Styx River corridor include NZ Scaup, Grey Teal, Paradise Shelduck, Black Swan, Canada Geese, Grey Duck, Mallard, Australasian Coot, Pūkeko, Black Cormorant, Pied Cormorant, little Cormorant, White-faced heron, Australasian Bittern, Marsh Crake, Spotless Crake, etc.

24. Parts of the site comprise lowland wet grassland habitats that extend across property boundaries and connect with similar habitats on neighbouring land. This continuity of habitat contributes to a broader open landscape used by wetland-associated bird species.

25. Additional habitat features across the site include small boggy depressions, drainage channels and riparian vegetation along the river margins and drains. These areas contain wetland plants such as rushes and sedges in places and contribute to the diversity of habitats present within what is otherwise a modified pastoral landscape.

26. The western portion of the site is located on slightly elevated sandy soils associated with historic dune systems. This area tends to be drier and is generally of lower ecological value compared with the wetter portions of the site, although species such as the New Zealand pipit have been recorded utilising these areas seasonally.

27. Accordingly, bird species associated with the Pūharakekenui–Styx River corridor and surrounding environments should be considered where vegetation removal, habitat modification or increased disturbance may occur within the site or along the river margins, including during the construction phase.

28. In my view, the ecological value of the site for birds relates both to its function as part of the wider Styx River and Brooklands Lagoon ecological system, and as a standalone habitat for some species.

POTENTIAL ECOLOGICAL EFFECTS OF DEVELOPMENT

29. Because development will be limited to the upper terrace areas, I generally agree with Virdis Environmental Consultants Ecological Impact Assessment in that the development site contains ‘limited terrestrial values’ for indigenous vegetation but does provide habitat for indigenous birds. I note however that these avifauna values are mostly limited to the lower floodplain and river corridor that will not be developed.

30. Ecological values associated with wet grassland habitats and bird use of the site could potentially be affected by habitat modification, increased human disturbance, increased predator presence, and recreational activity including dogs.

31. In particular, disturbance of wet grassland habitats and areas of seasonal ponding may influence the use of the site by waterbirds and wading birds that currently utilise these areas opportunistically and/or as year-round residents.

32. Contiguous wet grassland habitats on the low floodplain are particularly relevant as they connect with neighbouring wetland areas to the north, and the wider Pūharakekenui-Styx River corridor.

33. I also agree with the conclusions of Ecological Impact Assessment that – based on the ODP - the plan change will be able effectively manage adverse effects on the natural environment through the existing planning provisions and policy framework within the Christchurch District Plan and Canterbury LWRP. I agree that any potential adverse effects can be adequately mitigated through appropriate stormwater design, fauna management plans, restoration and riparian planting, and detailed design.

34. Maintaining these existing habitats, or restoring them through appropriate ecological design, would represent a positive ecological outcome for bird species utilising the site and the wider landscape.

MANAGEMENT ISSUES RELATING TO BIRD POPULATIONS

35. Development may result in bird flocking issues on grassed areas, particularly where large areas of open grassland are located immediately adjacent – or near to – large areas of open water such as stormwater facilities on site. Accordingly, development should anticipate bird presence and consider management approaches that avoid widespread culling.

36. Species likely to be present include Canada geese, black swan, paradise shelduck and pūkeko. While Canada geese are introduced and may be managed as nuisance species, black swans, paradise shelduck and pūkeko are native gamebirds that are protected except during the brief gamebird season.

37. Indigenous bird species likely to visit the site are the same as those also inhabiting the Pūharakekenui–Styx River corridor and Brooklands Lagoon. These birds make seasonally and daily tidal-influenced movements and Council does not want displaced as part of localised bird management on the site.

DESIGN AND MITIGATION CONSIDERATIONS

38. Development design should seek to minimise conflict between bird populations and land uses while recognising the ecological context of the Pūharakekenui-Styx River corridor and its environs.

39. This may include, increasing planted shrubland and wetland vegetation, and maintaining buffers around sensitive habitats. The ODP offers generous reserve widths and a wide river corridor that will be easily able to accommodate these buffers.

40. The proposed Outline Development Plan (**ODP**) provides opportunities for ecological enhancement, including restoration of the Pūharakekenui–Styx River margins, stormwater treatment wetlands and improved ecological connectivity along the river corridor.

41. Along the river corridor, as wide a reserve as possible – as shown on the ODP - is desirable for managing wildlife and mitigating potential human impacts (e.g. recreation) on wildlife using both the river corridor and pasture areas.

RESPONSE TO ECOLOGY RFI COMMENTS

42. The ecology-related RFI raised matters including the potential value of pasture and ephemeral wetlands for waterbirds and waders, ecological values associated with the Pūharakekenui–Styx River corridor, and the possible presence of indigenous plant species along the river.

43. The RFI also noted potential impacts on waders and waterbirds, including the potential for increased disturbance from human activity, dogs and predators.

44. The applicant's response states that many of these matters will be addressed through subsequent stages of the project, including subdivision, land-use and regional resource consent processes where the detailed design of stormwater basins, waterways and walkways will occur.

45. The lower terrace area is currently used for pastoral grazing and riparian margins are predominantly vegetated with exotic species. Urban development is not proposed within this area under the plan change.

46. The applicant has indicated that the proposal provides opportunities for ecological enhancement, including restoration of the Spencerville Drain and the Pūharakekenui–Styx River margins, the creation of stormwater treatment wetlands

and the potential restoration of central open space areas to wetland or other compatible open space uses.

47. While a number of the matters raised in the RFI relate to detailed design considerations that will be addressed through future consent processes, they highlight ecological values that should be recognised and appropriately managed as the design progresses.

48. As per Paragraph 33, I believe that based on the proposed reserve locations and widths depicted in the ODP, the plan change will be able to effectively manage adverse effects on terrestrial ecology and avifauna through the existing planning provisions and policy framework.

RESPONSE TO SUBMISSIONS

49. Thirty-four submissions were received related to ecology.

50. Submitters S9.1, S14.1, S20.1, S22.1, S23.1, S28.1, S34.1, S35.1, S36.1, S37.1, S41.1, S.49.1, S.51.1, S54.1, S55.1, S63.1, S65.1, P70.1, P71.1, S75.1, S41.1, and S46.1 opposed the development based on perceived negative impacts on the Pūharakekenui-Styx River. Throughout most of its length, the ODP shows residential and commercial lots and their associated infrastructure being set back 400 - 500 m from the Pūharakekenui-Styx River. Only one short section (approximately 100 m) of development interface at the extreme eastern end of the subdivision is within 150 m of the river. Therefore, I believe the ODP provides an unusually high degree of separation from the river corridor and effectively mitigates adverse effects on wildlife using the river and its environs.

51. I also note that the ODP shows a proposed reserve buffer along the true left bank of Pūharakekenui River corridor that has an average width of approximately 150 m and a large area of reserve along the true right bank. Combined, these reserve parcels offer significant opportunity for long-term ecological restoration that helps to achieve Councils visions (Styx Vision 2000 – 2040) for a **'viable spring-fed river ecosystem'** and for a **'source to sea experience'** through the creation of a source to sea urban reserve network and walkway.

52. These reserve parcels are critical links in this reserve and walkway network, and their generous widths are important for 1) buffering the effects of development on wildlife using the river corridor, 2) buffering the effects of users of the source to sea walkway on avifauna using the pasture areas, and 3) buffering the effects of users of the walkway on avifauna using the Pūharakekenui River corridor.

53. Submitter S46.1 supported the development only if the developer established a substantial native greenbelt between the proposed development and the existing Spencerville settlement, providing a clear visual and ecological separation that

allows for wildlife corridors and passive recreation. I note that the ODP shows an approximately 125 m wide recreation and/or stormwater reserve between the development and the Spencerville settlement. Such reserves are typically well-landscaped with urban forest and wetland buffers which will offer a good degree of buffering for wildlife using both the grazed pasture and the river corridor.

54. Submission S75.3 sought alternate relief by re-zoning the lower terrace HFHMA and ponding areas as "Conservation" zoning, and to widen the riparian corridor to a minimum of 20m). As-per paragraph 48 (above), I note that the average width of the proposed reserve corridor throughout most of its length is 150 m.

55. As noted in the previous section (Response to RFIs), the plan change itself does not impact on the Pūharakekenui-Styx River nor it's wildlife. The proposal conversely creates the potential for significant ecological benefits through stormwater basins, Spencerville drain restoration, and Styx margin restoration, whilst maintaining the potential for the central open space area to also be restored to wetland or a compatible open space activity in the future.

Topic	Submission	Decision sought
Ecology Support - Extensive Styx River margin zone; Public access to the Styx River, and Ecological restoration. Oppose - Nature and wildlife; Compromise Styx River and riparian margin; Impact native inanga & other wildlife; and Vague ecology risk assessment.	S25.1 SLLT; and S58.1 D Tipple.	Support
	S59.3 OMS (Support where the ODP facilitates place-based ecology learning).	Support in part
	S18.1 Z Duan (Minimum riparian buffer – 10m to 20m); S25.2 SLLT (Developer enters into partnership with the Trust); S25.3 SLLT (A robust avian management plan is developed and implemented); S25.4 SLLT (the intermittent wetlands are monitored for size and area coverage prior to earthworks commencement, and assessed against the CRPS Sites of Ecological Significance criteria); S25.5 SLLT (Mitigate sediment, monitor and enhance fish habitats); S25.6 SLLT (Lizard Management Plan); S26.7 SLLT (mitigate light spill on ecosystems and Styx River); S25.8 SLLT (Retain the 5m wide native landscape strip); S25.11 SLLT (Fencing and signage to manage dogs to protect habitats); S69.1 ECan (Pending an ecology impact assessment that demonstrates consistency with CRPS Policy 9.3.1 and Appendix 3);	Neutral
	S9.1 M Pierce; S14.1 SRA S19.1 M van Valkenburg; S20.1 D Riwaka; S22.1 D Elkington; S23.1 R Howison; S28.1 D Parker; S30.1 L Bennett; S31.1 Angela; S32.1 C Elkington; S34.1 D Ling; S35.1 R Ennor; S36.1 H King; S37.1 M Skelly; S41.1 M Gilmore; S49.1 N Hough; S51.1 G Lowe; S54.1 J Lowe; S55.1 MWFT; S57.1 J Hawkins; S63.1 J Burns; S65.1 C Faithfull; S68.1 L Maurice; S70.1 ORS; S71.1 K & A Buxton; and S75.1 J Messerly. S46.1 A Hicks (Accept only if significant conditions address preservation of natural values); S46.2 A Hicks (Accept only if greenbelt & landscape buffer to support wildlife & recreation are provided); S75.3 J Messerly (Alternate relief - Rezone the lower terrace HFHMA and ponding areas as "Conservation" zoning, widen the riparian corridor to a min. of 20m and	Reject

Topic	Submission	Decision sought
	relocate the stormwater basins outside of the high hazard area).	

CONCLUSIONS

56. The site currently contains wet grassland habitats, pastoral land, and the Pūharakekenui-Styx River corridor that are utilised by resident and seasonal bird species.

57. These habitats are functionally connected to the wider Pūharakekenui–Styx River corridor and the Brooklands Lagoon environment.

58. The plan change itself does not impact on the Pūharakekenui-Styx River nor it's wildlife. Conversely it creates the potential for significant ecological benefits through stormwater basins, Spencerville drain restoration, and Styx margin restoration, whilst maintaining the potential for the central open space area to also be restored to wetland or a compatible open space activity in the future.

59. While development has the potential to modify existing habitats, the ODP requirements create significant opportunities for ecological restoration and enhancement, particularly along the river corridor and through the creation of wetland and stormwater treatment areas.

60. Subject to appropriate design and ecological management through subsequent consent processes, the proposal therefore has the potential to deliver significant positive ecological outcomes compared with the existing pastoral land use, while also offering options to mitigate any human recreation impacts on wildlife using the site.