

12 May 2025

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Eliot Sinclair and Partners Ltd
PO Box 9339
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Attn: Guillaume Bourdin and Bryan McGillan

Dear Guillaume and Bryan,

Thank you for lodging a request for Private Plan Change 18 which is a proposal to rezone an area between Cashmere and Sparks Roads Christchurch from Rural Urban Fringe Zone to Residential New Neighbourhood Zone. In accordance with clause 23 of Schedule 1 of the Resource Management Act (RMA) the Christchurch City Council (the Council) requests the following further information:

Planning

- 1) The economic assessment and the s32 evaluation report of the request refers to professional advice that the land is not productive land. The documents provided to the Council do not include this professional advice or a report to justify this statement, can this be provided please. As outlined in clause 3.6(1) of the NPS HPL, Council may only allow urban rezoning of highly productive land if clauses 3.6(1)(a),(b), and (c) are satisfied. The potential effects that need to be considered relate to Clause 3.6(1)(c) which outlines that the environmental, social, cultural and economic benefits of rezoning need to “outweigh the long-term environmental, social, cultural and economic costs associated with the loss of highly productive land for land-based primary production, taking into account both tangible and intangible values”. The council requests further information on any potential effects related to highly productive land that may arise from the request.
- 2) The s32 evaluation notes at 211: “an ecological assessment of the subject land and associated watercourses has not yet been undertaken but will be required at a later stage of the consent process.” The Council notes that the private plan change request could be processed as a resource consent and Schedule 4 clauses 6 and 7 of the RMA would be applicable, however, for the purposes of processing a private plan change request the Council requests that all the necessary information on any potential ecological effects that may arise from the request be provided in accordance with clause 22(2) of Schedule 1.
- 3) Council notes that Appendix F ‘Urban Design Statement’, dated 25 March 2025, has been prepared by a landscape architect and is relied upon in the assessment of effects at paragraph 174 of the s32 report. Paragraph 174 of the s32 report outlines “Given that the site adjoins existing residential areas which are part of the Hoon Hay suburb to the east and rural areas to the west, the boundary interfaces have been carefully considered to mitigate and minimise and adverse effects.” Council cannot locate a report or a section of the ‘Urban Design Statement’ that considers these potential interface/landscape effects. The Council requests further information on any potential landscape effects that may arise from changing the land use of the site from rural to urban land use.
- 4) The Council requests further information on how the proposal would align with the operative Hendersons Outline Development Plan (East) in Appendix 8.10.18 of the Christchurch District Plan.
- 5) In preparing the request has any consultation been undertaken with the community in Hoon Hay or landowners adjoining the site?
- 6) It is noted that the primary objective/purpose of this request is to facilitate the rezoning of the site. The Council requests further information on the the benefits and costs, and the efficiency and effectiveness of any other possible

land use alternatives to better understand the request and complete the evaluation requirements of Section 32 of the Resource Management Act.

Transport

- 7) Please provide additional SIDRA modelling outputs at two arterial intersections: Hoon Hay Road / Cashmere Road and Sparks Road / Hoon Hay Road (Existing and Proposed).
- 8) Please provide additional CAST model outputs of volume and delay difference plots between the existing and rezoning scenarios.
- 9) Please provide additional modelling scenario in CAST for the vehicle access onto Cashmere Road to be connected at Penruddock Rise intersection through the proposed roundabout, as this may highlight further adverse increases in vehicle movements on existing and proposed residential roads.
- 10) The Operative Hendersons Outline Development Plan (East) in Appendix 8.10.18 shows two access points onto Cashmere Road. Considering the construction of a roundabout at the intersection of Penruddock Rise/Cashmere Road along with the existing access from Leistrella Road, Council requests further information on any potential effects that may arise from the construction of an additional access onto Cashmere Road.
- 11) Please clarify when interventions will be needed at Cashmere Road/Hoon Hay Road intersection and Sparks Road/Hoon Hay Road intersection, as development progresses northward from Cashmere Road toward Hoon Hay and Sparks Roads.
- 12) The Integrated Transport Assessment notes that the nearest public transport bus route/stop is between 600m-800m from the central and northern blocks of the site and thus the site would be 'relatively well served by public transport'. It is outlined in Council's Infrastructure Design Standards at Figure 4 that 90% of all residential development shall be located within 500m of a bus route. The Council requests further information on the potential effects of the greater distances to public transport proposed by the request.

Water Supply

- 13) The recommendations in Appendix M of the request, i.e. 'Eliot Sinclair - Cashmere/Hendersons Plan Change Water Supply Design Report' dated 28 April 2023, do not align with the recommendations of the WSP 'Cashmere Park Residential Development Water Supply Assessment', dated 11 November 2023, that was commissioned by CCC for this development. Can you please confirm the water supply arrangements for the proposed development? The Council requests further information on any potential effects that may arise from the clarified arrangements on the existing Council networks.

The further information is required to enable the Council to better understand the nature of the request in respect of the effects it will have on the environment, the ways in which any effects of the proposal may be mitigated, the benefits and costs, and the efficiency and effectiveness of any possible alternatives to the request, and the nature of any consultation undertaken.

If the applicant declines under clause 23(5) of Schedule 1 of the RMA to provide further information, the Council may at any time reject the request or decide not to approve the plan change requested for public notification, if it considers that it has insufficient information to enable it to consider how to deal with the request under clause 25 of Schedule 1.

Please do not hesitate to email Kirk Lightbody (kirk.lightbody@ccc.govt.nz) if any clarification on the above further information request points is needed to facilitate a response. The Council is happy to engage with the applicant, where appropriate, to enable the Private Plan Change request to be processed in a timely manner. We can also organise meetings with the relevant technical experts if necessary.

Kind regards,
Kirk Lightbody