

CHRISTCHURCH DISTRICT PLAN

PRIVATE PLAN CHANGE 18

CASHMERE FIELDS/HENDERSONS RESIDENTIAL

**PLANNING OFFICER'S REPORT UNDER SECTION 42A OF MIKAYLA JAYNE
PARNWELL UNDER THE RESOURCE MANAGEMENT ACT 1991**

7 AUGUST 2026

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LIST OF ABBREVIATIONS

CDPR	Christchurch District Plan Review
CRLTS	Canterbury Regional Land Transport Strategy 2024-34
CRPS	Canterbury Regional Policy Statement
FDS	Future Development Strategy
GCSP	Greater Christchurch Spatial Plan
IMP	Mahaanui Iwi Management Plan
ITA	Integrated Transport Assessment
LURP	Land Use Recovery Plan
NES-CS	National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health
NPS	National Planning Standards 2019
NPS-FWM	National Policy Statement on Freshwater Management
NPS-HPL	National Policy Statement for Highly Productive Land
NPS-I	National Policy Statement for Infrastructure
NPS-IB	National Policy Statement for Indigenous Biodiversity
NPS-NH	National Policy Statement on Natural Hazards
NPS-UD	National Policy Statement on Urban Development 2020
NZCPS	New Zealand Coastal Policy Statement
PPC18	See 'the plan change'
RMA / the Act	Resource Management Act 1991
s32 / s32AA	Section 32 / Section 32AA of the RMA (evaluations)
the Council/CCC	Christchurch City Council
the Plan/CDP	Christchurch District Plan
the plan change	Private Plan Change 18

1 EXECUTIVE SUMMARY

- 1.1.1 I have prepared this report pursuant to section 42A of the Resource Management Act 1991 (the Act/RMA) for Christchurch City Council (the Council) (CCC) in regard to Private Plan Change 18 (the plan change/PPC18) to the Christchurch District Plan (the Plan/CDP).
- 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 PPC18. The assessments and recommendations included in this report are intended to assist the Hearing Commissioner, submitters, and experts on PPC18. 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 (s32) Report that accompanies the plan change provides a detailed description of the proposal area and what CDP provisions are proposed to be changed by Cashmere Fields Ltd (the Proponent). PPC18 as notified, including the s32, requests for further information and responses, submissions and further submissions received are available on the Council website here - [Cashmere Fields/Hendersons Plan Change \(PC18\): Christchurch City Council](#).
- 1.1.4 PPC18 relates to land at 126 Sparks Road, 17 Northaw Street, 36 and 60 Leistrella Road, and 200, 236, 240 Cashmere Road. The proposal seeks to rezone land from rural to residential with associated infrastructure, utility services and facilities. The scope of PPC18 includes:
- Rezoning the some of the Rural Urban Fringe Zone (RuUF) portions of the proposal area to Residential New Neighbourhood (RNN), with an anticipated yield of 300 households (hh). Consequently, updating Planning Map 45 of the CDP to reflect the changed zoning.
 - Maintaining the RuUF zoning for stormwater management areas.
 - Updating the Hendersons Basin Outline Development Plan (ODP) to reflect the new residential area, addition of and/or changes to roading, recreational routes, land for stormwater management/recreational/conservation use, stormwater management basins, pedestrian/cycle links, and another waterway/drain to be enhanced.
 - Updating the ODP text to enable additional development beyond the current connection limit where wastewater servicing capacity can be demonstrated.
- 1.1.5 The standard RMA Schedule 1 process has been followed by the Proponent to promulgate the plan change.
- 1.1.6 Eighty-six (86) submissions were received on PPC18. Fifteen (15) of the submitters' primary relief is to support the rezoning, fifty-three (53) of the submitters' primary relief is to oppose PPC18, and

seventeen (17) of the submitters' primary relief is neutral. One (1) submitter did not state their primary relief. Multiple submission points seek alternative relief if the rezoning is approved, including in respect to the ODP, additional infrastructure requirements, and the need for additional information.

1.1.7 A range of matters have been raised by the submitters, including:

- Accessibility, traffic congestion and safety
- Infrastructure adequacy and capacity
- Flooding and natural hazard risk
- Loss of rural land and urban growth
- Natural values effects and socio-economic effects on existing residents
- Amenity effects, urban design and landscaping
- Technical information, evidence gaps and process

1.1.8 Having evaluated the notified plan change material, the submissions and further submissions received, the findings of the Council's expert advisors and the additional information provided by the Council since notification, I have recommended that PPC18 be approved with amendments. The recommended amendments to the ODP narrative are included in Appendix 2. In accordance with the further evaluation undertaken under section 32AA of the RMA, I consider that the ODP and associated narrative with recommended amendments are the most appropriate way to achieve the objectives of the Plan and the purpose of the RMA.

2 INTRODUCTION

2.1 REPORTING OFFICER

- 2.1.1 My full name is Mikayla Jayne Parnwell. I am employed as a Policy Planner in the City Planning Team, within the Strategy, Planning and Regulatory Services Group of the Christchurch City Council (the Council). I have been in this position since September 2025.
- 2.1.2 I hold a Bachelor of Resource and Environment Planning (Hons) from Massey University. I am an intermediate member of the New Zealand Planning Institute.
- 2.1.3 I have four years' experience in planning and resource management in New Zealand, having worked as a resource consents and policy planner for the Taupo District Council prior to my current role at Christchurch City Council. My experience relevant to this hearing includes the preparation of plan changes to the Taupo District Plan.
- 2.1.4 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. 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.

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 PPC18 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 PPC18, in terms of the statutory requirements;
 - b. Consider the issues raised and the relief sought in submissions and further submissions, and then make recommendations on whether to accept, accept in part, reject or reject in part each submission and further submission point.
- 2.2.3 My recommendations to accept, accept in part, reject or reject in part the submissions and further submissions received on PPC18 are in Appendix 3. 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 PPC18 including background, summary of the relevant plan changes being sought, procedural steps and summary of submissions received.
- b. Evaluation of the matters raised in submissions and in the expert evidence that culminates in the recommendations on whether to accept, accept in part, reject or reject in part the relief being sought.
- c. A consideration of the statutory considerations and instruments as outlined in section x of this report, the Section 32 report and including national direction, regional planning documents and the Maahanui Iwi Management Plan.

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. Liqi Chen, Transport Network Planner – Asset Planning - Transport (Council) – Transport – Appendix 4
- b. Brian Norton, Senior Stormwater Planning Engineer - Asset Planning – Stormwater & Waterways (Council) – Stormwater – Appendix 5
- c. Neil Charters, Principal Geotechnical Engineer at ENGEO (Consultant for Council) – Geotechnical –Appendix 6
- d. Michele McDonald, Team Leader: Asset Planning - Water and Wastewater (Council) – Wastewater and Water - Appendix 7
- e. Peter Barnes, Senior Parks and Policy Planner - Planning and Policy (Council) – Open Space – Appendix 8
- f. David Hattam, Senior Urban Designer – Urban Design (Council) – Urban Design - Appendix 9
- g. Abigail Smith, Senior Landscape Architect - Landscape Architecture Team (Council) – Landscaping –Appendix 10
- h. Andrew Crossland, Ecologist - Biodiversity (Council) – Ecology – Appendix 11

2.2.6 I have visited the proposal area and am familiar with the wider context of the area, including Cashmere, Hoon Hay, and Halswell.

3 PRIVATE PLAN CHANGE 18 OVERVIEW

3.1 EXISTING PLAN PROVISIONS AND AMMENDMENTS PROPOSED

- 3.1.1 The request area covers 25.34ha. Which is partially zoned RuUF (19.93ha) and partially zoned RNN (5.40). The proposal involves an extension of an existing RNN zoned area, the RNNZ being applied to greenfield development areas.
- 3.1.2 The existing Henderson's Outline Development Plan (HODP) applies to the proposal area, which has an associated narrative and development requirements (Chapter 8 of the CDP, Appendix 8.10.18).
- 3.1.3 The purpose of ODP's is to guide the subdivision design and land development to achieve RNN zone objectives and Strategic Directions of the CDP.
- 3.1.4 Proposed changes to the Hendersons ODP include supporting the future urban structure through connections and open space, to create opportunities for amenity and a strong sense of place. Section 8.6.11 of the CDP requires subdivision within the RNN zone to provide a minimum net density of 15 households per hectare, enabling a range of section sizes typically between 300-550sqm.
- 3.1.5 19.93 hectares of the proposal area is currently zoned RuUF. Section 8.6.1 of the CDP sets out 4 hectares as the minimum proposal area area for subdivision within the RuUF zone. The RuUF is one of the District Plan's seven Rural Zones, the spatial extent of the zone is the flat land immediately surrounding Christchurch City.
- 3.1.6 The proposal area is subject to the following Chapter 5 Natural Hazard overlays, as shown in Figure 1, which apply specific rules that manage land use activities, building floor levels and earthworks:
- Flood Management Area
 - Flood Ponding Management Area
 - High Flood Hazard Management Area
 - Liquefaction Management Area (LMA)
- 3.1.7 Within the High Flood Management Area subdivision is a non-complying activity to give effect to Chapter 5.2.2.1(b)(iii) which directs subdivision, use or development is avoided where it will increase the potential risk to people's safety, well-being and property. Subdivision to create an additional vacant allotment or allotments is also a non-complying activity.
- 3.1.8 Provisions related to the Flood Ponding Management Area (refer Rule 5.4.5 of the CDP), manage earthworks, ground level alterations, utility dimensions, building numbers and foundation requirements, and subdivision. Allotments are permitted to have only one residential unit, with a consenting pathway as a non-complying activity for additional units.

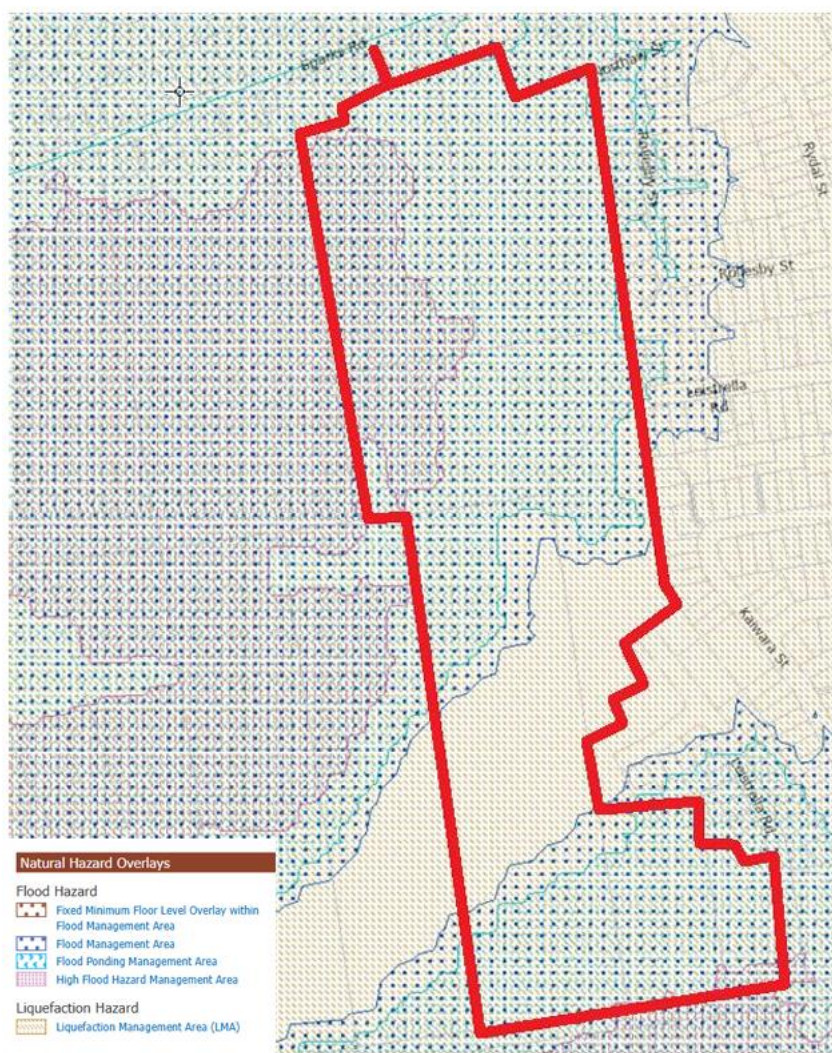


Figure 1: Natural Hazard Overlays for Proposal Area (outlined in red) under the CDP

3.2 SUMMARY OF THE PLAN CHANGE

3.2.1 The stated purpose of PPC18 is:

“...to enable residential development and increased housing density through a unified RNN zone coupled with an amended ODP set across the PPC site.”

3.2.2 PPC18 seeks to retain the full extent of the existing RNN zoned area but to rezone the RuUF areas to RNN, while leaving the proposed stormwater management areas as RuUF zone. This will facilitate the development of roughly 300 residential sections at a minimum net density of 15 households per hectare.

3.2.3 PPC18 proposes changes to the CDP to replace the Hendersons Outline Development Plan with a new ODP, and to amend the operative ODP text, to guide the development of the proposal area.

3.2.4 No changes are proposed to the operative RNN or RuUF policy or rule frameworks beyond the replacement of the Hendersons ODP and an amendment to the associated ODP narrative.

3.3 BACKGROUND AND PROCEDURAL STEPS

- 3.3.1 I adopt the Proponents' description of the proposal area and its surrounding environments for the purposes of establishing the proposal area context. The land is privately owned by five different entities.
- 3.3.2 The option to rezone land on the periphery of Hendersons Basin was first considered through the Southwest Christchurch Area Plan (2009), which identified future urban development areas and provided a framework for land use planning and public expenditure, to ensure growth was integrated, collaborative and maintained intrinsic values of the area. Growth areas were implemented through the Christchurch District Plan Review (CDPR), which became operative in 2017. This included rezoning of land around the periphery of Hendersons Basin, a major ponding basin within the Heathcote River Catchment. New residential areas were zoned Residential New Neighbourhood (RNN), with a supporting Hendersons Basin Outline Development Plan (ODP).
- 3.3.3 An alternative ODP was later presented during the CDPR through Council evidence on the grounds it could achieve a better urban form and subdivision layout. However, the Independent Hearings Panel (IHP) determined that the CRPS objective 6.2.1 (3) which directs urban activities outside greenfield priority areas must be avoided, did not provide scope for urban rezoning requests outside of Map A of the CRPS to be accepted. As a result, the proposal area was not able to be considered for rezoning through the CDPR.
- 3.3.4 The proponent subsequently sought rezoning through Plan Change 14, but this was again deemed to be out of scope, in this case within an Intensification Planning Instrument.
- 3.3.5 A private plan change is currently the most expedient pathway to achieve a rezoning. Cashmere Fields Ltd lodged PPC18 with the Council on 1 April 2025.
- 3.3.6 A further information request was issued on 12 May 2025 and was responded to by the proponent on 5 August 2025. This response contained a cover letter, an assessment of the National Policy Statement for Highly Productive Land prepared by The Agribusiness Group, an ecological assessment undertaken by Instream Consulting, and a response to transport matters prepared by Stantec.
- 3.3.7 PPC18 was accepted for notification pursuant to clause 25 of Schedule 1 under a delegated decision by Council's General Manager – Strategy, Planning and Regulatory Services on 16 January 2025.
- 3.3.8 PCC18 was publicly notified on 6 February 2026. Submissions closed on 9 March 2026, and the summary of submissions were publicly notified on 30 April 2026. Further submissions closed on 14 May 2026. There were no submissions or further submissions received after the notified closure of submission dates.

- 3.3.9 PCC18 has reached the point now where a hearing is 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 and the associated submissions (Clause 10 of Schedule 1).

3.4 OVERVIEW OF SUBMISSIONS AND FURTHER SUBMISSIONS

- 3.4.1 A total of eighty-six submissions were received on PCC18 and are available on Council's website here: [PPC18 Summary of Submissions](#). The submissions are summarized in Table 1 below and recorded in Appendix 3. The matters raised by submitters are considered in Section 5 of this report.

<i>Table 1: PPC18 Submissions Received</i>			
<i>Submitter</i>	<i>Relief Sought</i>	<i>Submitter</i>	<i>Relief Sought</i>
<i>S01 R Fletcher</i>	<i>Support</i>	<i>S44 T McNaughton</i>	<i>Neutral</i>
<i>S02 L Smith</i>	<i>Oppose</i>	<i>S45 J Haylock</i>	<i>Neutral</i>
<i>S03 A Carr</i>	<i>Oppose</i>	<i>S46 R Berthault</i>	<i>Neutral</i>
<i>S04 W Taggart</i>	<i>Oppose</i>	<i>S47 S Marquet</i>	<i>Oppose</i>
<i>S05 M Pfahlert</i>	<i>Neutral</i>	<i>S48 J & K Walker</i>	<i>Oppose</i>
<i>S06 L Miller</i>	<i>Neutral</i>	<i>S49 K Swart</i>	<i>Oppose</i>
<i>S07 L Revell</i>	<i>Neutral</i>	<i>S50 A Saville</i>	<i>Not stated</i>
<i>S08 M Courtney</i>	<i>Oppose</i>	<i>S51 A Clothier</i>	<i>Oppose</i>
<i>S09 V Nock</i>	<i>Oppose</i>	<i>S52 J de Jongh</i>	<i>Oppose</i>
<i>S10 D O'Brien</i>	<i>Neutral</i>	<i>S53 M Burns</i>	<i>Oppose</i>
<i>S11 P Wells</i>	<i>Neutral</i>	<i>S54 M Lee</i>	<i>Oppose</i>
<i>S12 D Aspros</i>	<i>Oppose</i>	<i>S55 M Lewis</i>	<i>Support</i>
<i>S13 D Fox</i>	<i>Oppose</i>	<i>S56 L Lewis</i>	<i>Support</i>
<i>S14 G Macfarlane</i>	<i>Oppose</i>	<i>S57 T Harris</i>	<i>Support</i>
<i>S15 G Magrath</i>	<i>Oppose</i>	<i>S58 W R Lewis</i>	<i>Support</i>
<i>S16 H Jones</i>	<i>Oppose</i>	<i>S59 H White</i>	<i>Oppose</i>
<i>S17 C Sullivan</i>	<i>Oppose</i>	<i>S60 M Avery</i>	<i>Support</i>
<i>S18 J Albertson</i>	<i>Oppose</i>	<i>S61 R Brinch</i>	<i>Neutral</i>
<i>S19 S Reynolds</i>	<i>Support</i>	<i>S62 N Meeten</i>	<i>Support</i>

<i>S20 P J Coleman</i>	<i>Oppose</i>	<i>S63 J Conaghan</i>	<i>Oppose</i>
<i>S21 G Davies</i>	<i>Oppose</i>	<i>S64 D Chapman</i>	<i>Oppose</i>
<i>S22 S Walker</i>	<i>Oppose</i>	<i>S65 K Moeller</i>	<i>Oppose</i>
<i>S23 A Swann</i>	<i>Oppose</i>	<i>S66 M Hill</i>	<i>Neutral</i>
<i>S24 A Kokje</i>	<i>Oppose</i>	<i>S67 A McCarthy</i>	<i>Oppose</i>
<i>S25 G Trost</i>	<i>Oppose</i>	<i>S68 C Barry</i>	<i>Oppose</i>
<i>S26 J Avi</i>	<i>Support</i>	<i>S69 L Kellerhals</i>	<i>Oppose</i>
<i>S27 H Squire</i>	<i>Oppose</i>	<i>S70 M R Karreman</i>	<i>Oppose</i>
<i>S28 L Williams</i>	<i>Oppose</i>	<i>S71 C Hughes</i>	<i>Support</i>
<i>S29 Z Porter</i>	<i>Oppose</i>	<i>S72 H Wallace</i>	<i>Oppose</i>
<i>S30 F Niles</i>	<i>Oppose</i>	<i>S73 S I Down</i>	<i>Oppose</i>
<i>S31 D Millar</i>	<i>Neutral</i>	<i>S74 H Riordan</i>	<i>Neutral</i>
<i>S32 D Clarke</i>	<i>Oppose</i>	<i>S75 F Tabley</i>	<i>Oppose</i>
<i>S33 D Chen</i>	<i>Oppose</i>	<i>S76 D Lee</i>	<i>Support</i>
<i>S34 K Rodden</i>	<i>Oppose</i>	<i>S77 C Hois</i>	<i>Oppose</i>
<i>S35 L McClure</i>	<i>Support</i>	<i>S78 G Dunstan</i>	<i>Oppose</i>
<i>S36 R Lockwood</i>	<i>Neutral</i>	<i>S79 K Melnik</i>	<i>Oppose</i>
<i>S37 S Nissen</i>	<i>Oppose</i>	<i>S80 S Joubert</i>	<i>Oppose</i>
<i>S38 R Kirk</i>	<i>Oppose</i>	<i>S81 D Lewis</i>	<i>Support</i>
<i>S39 Michael Simek</i>	<i>Oppose</i>	<i>S82 K Leslie</i>	<i>Neutral</i>
<i>S40 M Winter</i>	<i>Oppose</i>	<i>S83 S Flynn</i>	<i>Oppose</i>

<i>S41 A Evans</i>	<i>Support</i>	<i>S84 F Collins</i>	<i>Neutral</i>
<i>S42 A Gabites</i>	<i>Oppose</i>	<i>S85 Ministry of Education</i>	<i>Neutral</i>
<i>S43 M Lee</i>	<i>Oppose</i>	<i>S86 CRC</i>	<i>Neutral</i>

3.4.2 As recorded in Table 2 below, there were two further submissions received on PCC18.

<i>Table 2: Further Submissions Received</i>	
<i>Submitter</i>	<i>Relief Sought</i>
<i>FS01 B Lee</i>	<i>Support - S58 W R Lewis</i>
<i>FS02 D Lee</i>	<i>Did not support or oppose an initial submission</i>

3.4.3 The main matters raised by submitters are:

- Accessibility, traffic congestion and safety
- Infrastructure capacity and adequacy
- Flooding and natural hazard risk
- Loss of rural land and urban growth
- Natural values effects and socio-economic effects on existing residents
- Amenity effects, urban design and landscaping
- Technical information, evidence gaps and process

3.4.4 The nature and scope of the submissions do not give rise to trade competition and the 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. 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:

- Explain the purpose of, and reasons for, the proposed plan change and contain an evaluation report prepared in accordance with section 32 of the RMA.
- 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 the PPC18 under Part 2 of Schedule 1 are summarized below and include whether the CDP will continue to:

- *“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).
- *“Accord with”* the RMA Part 2 Purpose and Principles (section 74 (1)(b)).
- *“Accord with”* relevant national policy statements, the New Zealand Coastal Policy Statement (NZCPS), the national planning standards and regulations (section 74 (1) (ea) and (f)).
- *“Give 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)).

4.1.4 In evaluating the appropriateness of PPC18, Council must also:

- *“Have particular regard”* to an evaluation report prepared in accordance with section 32 (section 74 (1) (e)).
- *“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)).
- *“Take into account”* any relevant planning document recognized by an iwi authority (section 74 (2A)).
- *“Not have regard”* to trade competition or the effects of trade competition (section 74 (3)).
- Ensure the rezoning is *“not be inconsistent”* with any relevant water conservation orders or regional plans (section 75 (4)).
- *“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 PPC18 include the establishment, implementation and review of objectives, policies, and methods to:

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

- 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)).
- 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 missions and mitigating any related effects (section 31 (1)(d)) and any other functions under the Act (section 31 (1)(f)).

4.1.6 The existing objectives of the operative Christchurch District Plan are not proposed to be altered or added to by this Plan Change. Sections 5 of this report, therefore, evaluates the extent to which the purpose of the Plan Change (s32(6)(b)) is the most appropriate way to achieve the purpose of the Act (s32(1)(a) [where ‘objectives of the proposal’ means ‘the purpose of the proposal’ as per s32(6)(b)]). The evaluation, therefore, examines whether:

- the purpose of the plan change (s32(6)(b)) is the most appropriate way to achieve the purpose of the Act (s32(1)(a));
- the provisions in the proposal are the most appropriate way to achieve the purpose of the plan change;
- the provisions in the proposal implement the unaltered objectives of the District Plan;

5 ANALYSIS OF PPC18 AND EVALUATION OF SUBMISSIONS

5.1 OVERVIEW

5.1.1 This section includes a summary of the material included within PPC18, details the submission points received, and outlines the expert evidence to inform the overall recommendations of this Report. I have evaluated this information and made recommendations on whether the relief sought in the submissions should be accepted or rejected, in whole or in part.

5.1.2 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 2.

5.1.3 As a result of consideration of submissions, I recommend some amendments to the ODP narrative. In this report, the operative ODP narrative is shown as *normal text in italics*. Amendments proposed by the Plan Change as notified are shown as *italicised black bold underlined* or ~~*black bold*~~ text. Any text recommended to be added by this report will be shown as *red bold underlined* text in italics and that to be deleted as ~~*red bold*~~ text in italics.

5.2 ACCESSIBILITY, TRAFFIC CONGESTION AND SAFETY

Submissions received – Accessibility, traffic congestion and safety

5.2.1 Ninety-two (92) submission points cover transport network safety, efficiency and accessibility, which in summary:

- Support PCC18 based on the proposal area's proximity to active and public transport options and good public transport accessibility supporting further growth, along with the proposal's ability to improve connectivity through road links and cycle and pedestrian links, promote a safe, walkable and bike-friendly location close to the city.
- Support PPC18 where the proposal is approved with Medium Density zoning.
- Support PCC18 but seek alternate relief including improved public and active transport (including a new bus route), and enhanced cyclist safety.
- Submitters that either opposed or held a neutral position seek alternative relief including many additional improvements to the transport network. Examples being, traffic lights at Cashmere Road/Penruddock Rise intersections, a full upgrade of Cashmere Road, traffic calming on Rollesby Street, and safe crossing points on Northaw Street, Rydal Street, and Leistrella Road. In addition, continuous, clearly designated walking and cycling connections (including along Cashmere Road, Hendersons Road, Sparks Road and Kaiwara Street), upgrades to the Kaiwara Reserve pathway, improved cycling infrastructure, provision of footpaths, and safer pedestrian and cycleways across the network.
- Oppose PCC18 as it will increase traffic volumes and place unsustainable pressure on the roading network, worsening existing congestion, poor road conditions, and safety issues. Submitters consider that infrastructure, including roading, public transport, footpaths, and cycling provision, is insufficient to support the growth, with concerns about reduced safety for pedestrians and cyclists and effects on residents, particularly around schools and key routes. Further relief includes traffic management measures such as traffic calming, speed limits, and discouraging through traffic, as well as ensuring no road access through Kaiwara Reserve. In addition, submitters seek broader changes to the proposal, including reducing housing density or dwelling numbers, rezoning the proposal area to Residential Suburban Zone, requiring direct access to Sparks Road (and in some cases no access to Leistrella Road), requiring better integration with the transport network, and substantially revising the proposal to address transport and infrastructure concerns. Submitters seek a delay or decline the plan change until key infrastructure issues are addressed.

Analysis – Accessibility, traffic congestion and safety

- 5.2.2 The request is supported by an Integrated Transport Assessment (ITA) prepared by Stantec. It is noted that the ITA is based on a yield of 210 households. However, applying 20hh per ha to the request area could yield 320 households. I understand the effect of this difference on the transport network will be addressed by the proponent through their evidence. Notwithstanding this, transport modelling¹ undertaken by Stantec, confirms the forecast increase in traffic on Cashmere Road will be modest and not materially affect the wider road network.
- 5.2.3 The Integrated Transport Assessment prepared by Stantec has been peer reviewed by Liqi Chen, Councils Transport Network Planner that is in Appendix 4 of this report. Mr. Chen, in his evidence, has considered the potential adverse effects that PPC18 may have on accessibility, traffic congestion and safety. Mr. Chen generally agrees with the conclusions of the proponents Integrated Transport Assessment, specifically that the transport network is capable of accommodating the forecast traffic growth associated with the proposal, and the proposal is consistent with the future transport network envisaged under the Hendersons East Outline Development Plan.
- 5.2.4 Mr. Chen does however consider several transport matters that require refinement through the Outline Development Plan framework and future subdivision stages, including:
- The design and function of the internal spine road network.
 - Management of rat-running and neighbourhood amenity effects.
 - Implementation of safe walking and cycling connections through Kaiwara Reserve and toward Hoon Hay Road and Sparks Road.
 - Improved future public transport accessibility.
 - Utilisation of the Cashmere Road/Penruddock Rise roundabout and road connections.
- 5.2.5 Council requested a review of the access arrangements and assessment of an alternative which utilized the Penruddock Rise/Cashmere Road intersection (new roundabout). It is noted that the proposed ODP does not show that the Cashmere Road/Penruddock Rise intersection roundabout has been constructed, as part of RM/2023/1256A. The proposed ODP currently shows a red arrow to the west of the Cashmere Road/Penruddock Rise intersection, indicating a proposed access point with no fixed location. However, the Cashmere Road/Penruddock Rise roundabout is now under construction. As such, this red arrow should be removed replaced with a black arrow (indicating a fixed road position) at the location of the new Cashmere/Penruddock Rise roundabout, to ensure that the ODP more accurately reflects the existing roading network. Furthermore, although I note that the location of the red arrow is indicative only, a road connection

¹Refer to SIDRA modelling outputs for the Hoon Hay Road/Cashmere Road and Sparks Road/Hoon Hay Road intersections under existing and proposed conditions, and CAST modelling outputs showing differences in traffic volumes and delays between the existing and rezoning scenarios, here: [Transport RFI Response](#).

in this exact location would no longer be feasible, due to the layout of the subdivision being undertaken on this allotment, being Resource Consent RMA/2023/1256A, which would result in a road connection in this location needing to pass through a local purpose reserve, as shown in the snippet from the scheme plan in Figure 2 below. A full copy of this scheme plan is provided in Appendix 12 of this report.

- 5.2.6 It is noted that the land subject to RMA/2023/1256A is included within the operative Hendersons ODP, however this land does not form part of the PC18 proposal area.

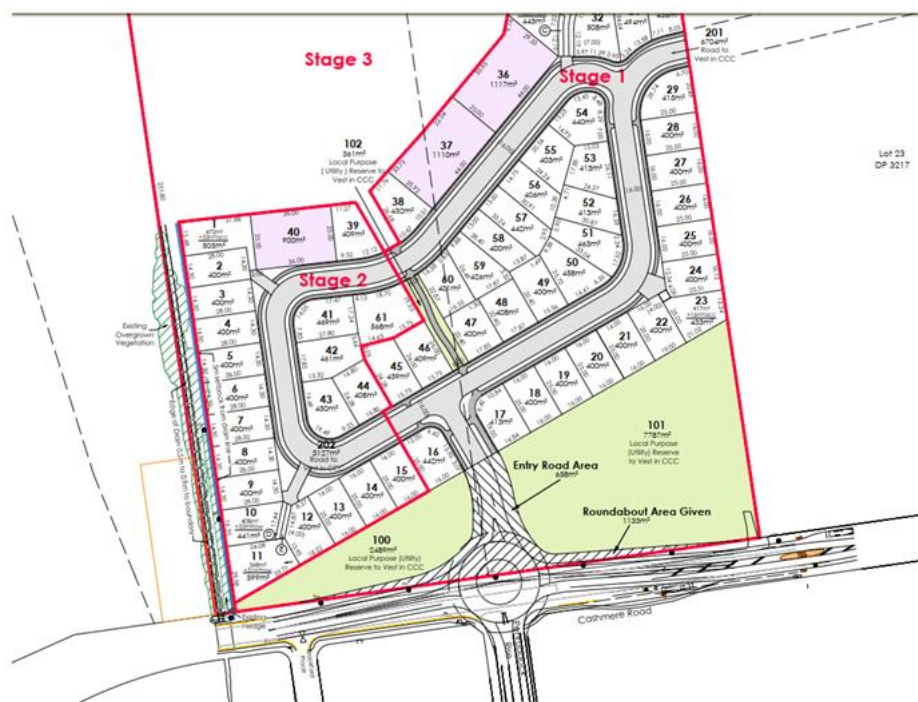


Figure 2: RMA/2023/1256A Scheme Plan

- 5.2.7 As such, I recommend that the amendment to the proposed ODP map is undertaken in accordance with the changes outlined in Figure 3 below.

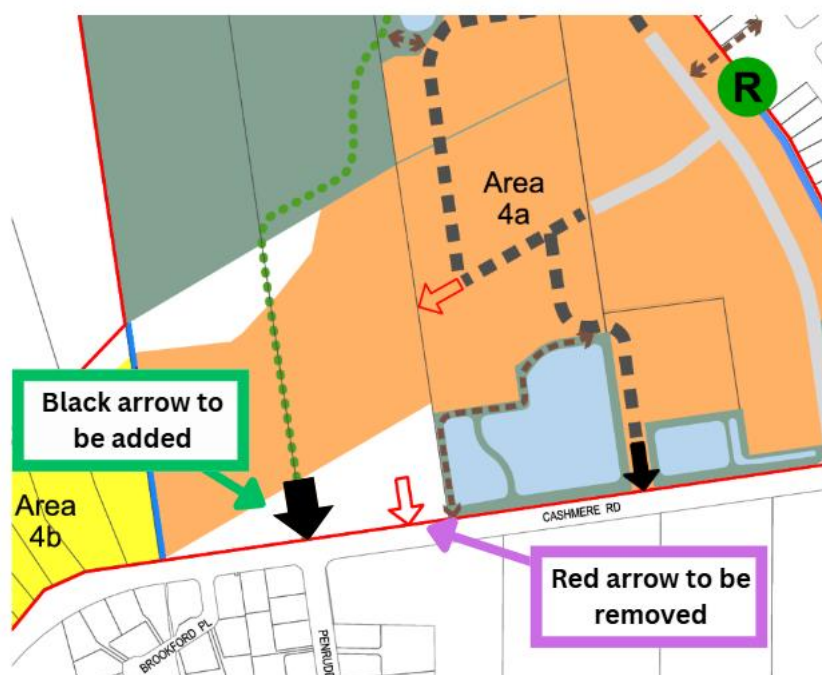


Figure 3: Recommended amendment to proposed ODP map

- 5.2.8 This proposed amendment is evaluated in Table 3 and recorded in the schedule of amendments in Appendix 2.
- 5.2.9 Council requested further assessment of the proposal's public transport accessibility, noting that parts of the proposal area would be located between 600 and 800 metres from the nearest bus stops, which exceeds the Council Infrastructure Design Standards guideline that 90% of residential development should be located within 500 meters of a bus route. Whilst some people may consider a walking distance of 600-800m to be a barrier to use of public transport, the NZTA guidance² indicates that people may be willing to walk to higher frequency routes (more than 15 min intervals). In this particular location the Orbiter provides service every 10mins (refer to Metro Christchurch here: [Metro Go](#)).
- 5.2.10 I rely on the evidence of Mr. Chen, who considers that, subject to the recommendation outlined in Section 5.2.12, the transport effects of PPC18 are acceptable within the context of a greenfield residential growth area and are generally consistent with the transport-related objectives and policies of the Christchurch District Plan. Mr. Chen's evidence notes that traffic volumes on Leistrella Road are expected to increase from approximately 2,600 to 3,550 vehicles per day, which may result in some adverse safety, efficiency and amenity effects for existing residents. However, he concludes that these effects can be appropriately managed through the existing controls within the ODP and CDP. He notes that transport modelling demonstrates that traffic generated by PPC18 can be accommodated within the surrounding road network and is not expected to result in

² NZTA Public Transport Design Guide: [Public transport design guidance](#) | [NZ Transport Agency Waka Kotahi](#)

significant adverse operational effects beyond those already anticipated from wider background growth. While acknowledging concerns regarding cumulative transport effects and the increased traffic experienced by residents along Leistrella Road, Mr. Chen considers it unreasonable to require PPC18 alone to address broader network capacity constraints associated with ongoing urban growth.

- 5.2.11 Overall, I rely on the expert evidence of Mr. Chen that while PPC18 will contribute to increased traffic volumes and that residents along Leistrella Road may experience some adverse effects, that the additional traffic generated by the proposal can be accommodated within the existing transport network without giving rise to significant adverse effects.
- 5.2.12 The existing ODP does not include staging requirements, however Mr. Chen considers the increased scale of development proposed through PPC18 justifies the introduction of a staging approach to assist in managing transport effects, particularly during construction of the subdivision. Mr. Chen recommends that development should be staged so that the southern portion of the proposal area, which has direct access to Cashmere Road via Leistrella Road, is developed first. Mr. Chen states that this would enable initial development and construction traffic to utilize the higher-order road network, reducing reliance on access through established residential areas via Hoon Hay Road and Sparks Road. As noted by Mr. Chen, the upgrade of the Penruddock Rise/Cashmere Road intersection will improve the operational performance and capacity of this part of the network, making Cashmere Road an appropriate primary access point for the early stages of development.
- 5.2.13 Accordingly, I recommend the ODP narrative 8.10.18.D Development Requirement 7 (Staging) is amended to require development to proceed from the Cashmere Road frontage inward to minimising adverse transport effects on the surrounding residential road network and supporting an efficient and logical pattern of urban development.
- 5.2.14 It is proposed to replace 8.10.18.D.(7).(a) as follows:

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

- 5.2.15 *As it relates to 8.10.18 Hendersons Outline Development Plan (East), development is expected to be staged from staged from the Cashmere Road frontage inward, with early development obtaining access from Cashmere Road via Leistrella Road where practicable.*
- 5.2.16 This proposed amendment is evaluated in Table 3 and recorded in the schedule of amendments in Appendix 2.

- 5.2.17 Submitters raised concerns regarding the adequacy of the active transport network within the area, and the safety of cyclists and pedestrians. The Integrated Transport Assessment (ITA) explains active transport and safety issues raised relate to existing network conditions. Importantly, that infrastructure improvements achieved through the proposed develop, particularly within the Hoon Hay Road corridor, will benefit the network. This includes new pedestrian crossing facilities, kerb extensions, intersection upgrades and measures to reduce vehicle speeds and improve pedestrian visibility. Recognition of the importance of network improvements to support the development, is set out under ODP clause 8.10.18.D.(4). This requires a fully interconnected local road network and provision of connected active transport infrastructure such as footpath links, pedestrian and cycle connections, and safe access to key destinations.
- 5.2.18 Another concern of submitters is rat-running through local residential streets, and the adequacy of active transport infrastructure. Mr. Chen considers that rat running can be appropriately managed through the detailed design of the future road network, including road design, speed management measures, traffic calming treatments, and the creation of a street environment that promotes safe and low-speed vehicle movements. Mr. Chen notes, and I agree, that Outline Development Plan provision 8.10.18.D already provides an appropriate framework for incorporating neighborhood traffic calming measures within the development.
- 5.2.19 Submitters sought improved public transport provision, including the addition of new bus routes servicing the area. While I acknowledge these concerns, the provision and planning of public transport services is the responsibility of Environment Canterbury and not an RMA matter. Future enhancements to public transport services within the Halswell area are being consulted on. See: [Proposal: Changes to Route 44 Shirley/Westmorland | Proposed changes to Route 44 and Route 135 | Have Your Say](#), and I encourage submitters and the proponent to participate in this consultation and any future public transport service reviews.
- 5.2.20 In relation to submissions stating that the proposal will improve connectivity through pedestrian links, evidence by Mr. McFarlane states that the proposed street layout will create a connected network that integrates seamlessly with the existing neighbourhood and surrounding transport infrastructure. Mr. Hattam, Council's Senior Urban Designer, generally agrees with this assessment and I concur, particularly with the benefits gained through the combination of on-road and off-road pedestrian paths shown on the Outline Development Plan (ODP). These will provide a range of route options and walking experiences. Accordingly, I recommend that the associated submissions in support are accepted.
- 5.2.21 Submitters opposed the proposed road connection through Kaiwara Reserve. Mr. Chen agrees that the primary function of Kaiwara Reserve should remain as a local recreational and ecological asset. Mr. Chen considers that the proposed pedestrian and cycle connection through the reserve represents a positive outcome of PPC18, providing an important active transport link that will improve connectivity between the development and the wider walking and cycling network. Mr.

Chen states he does not support any future extension of Blakiston Street or any other road connection through Kaiwara Reserve. As such, I recommend these submissions be accepted.

- 5.2.22 I support Mr. Chens amendment to the PCC18 ODP narrative to ensure that Kaiwara Reserve should remain as a local recreational and ecological asset. Given that the entirety of ODP narrative provision 8.10.18.D.a.3.e relates to a road extension through Kaiwara Reserve, I recommend that the entire provision is removed. This proposed amendment is evaluated in Table 3 and recorded in the schedule of amendments Appendix 2.
- 5.2.23 It is proposed that the Hendersons Outline Development Plan narrative development requirement 8.10.18.D.a.(3).(e). is removed as follows:

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

S32AA Amendments – Accessibility, traffic congestion and safety

Table 3 – Evaluation of recommended changes - Accessibility, traffic congestion and safety

Changes to PCC18 proposed amendments	Effects and evaluation of changes
Amendment of the proposed ODP Map Road connections to reflect the existing roading layout.	The proposed amendment is considered appropriate, effective and efficient as it updates the ODP to accurately reflect the roading infrastructure that is now under construction. the proposed change ensures that the ODP aligns with both the constructed transport network and the approved subdivision pattern, while avoiding potential confusion regarding the location of future road connections.
Amendment of ODP development requirement 8.10.18.D.(7).(a), which require that development of the proposal area will proceed from existing roads inwards towards the basin.	The proposed amendment is considered appropriate, effective and efficient as it provides clear direction on the staging of development in response to the increased scale of growth enabled by PPC18. By encouraging development to proceed from the Cashmere Road frontage inward, early development and construction traffic can utilise the higher-order road network, and reduce potential adverse traffic effects on existing residential areas accessed via Hoon Hay Road and Sparks Road.
Removal of ODP Development Requirement 8.10.18.D.a.(3).(e), which will remove the development requirement to extend Kaiwara Reserve and the reference to a potential extension of a road through the Kaiwara Reserve.	The proposed amendment is considered effective and efficient because it removes a development requirement that is no longer appropriate in the current context. Since the provision was introduced, Kaiwara Reserve has been extended. A road

	extension through the reserve is also no longer considered an appropriate land use outcome. Removing the requirement will ensure the District Plan better reflects the intended function of the reserve, improve plan clarity, and reduce uncertainty in plan implementation.
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Recommendations – Accessibility, traffic congestion and safety

- 5.2.24 I have provided individual responses to submission points in Appendix 3. Overall, any potential transport effects arising from the request can be mitigated via recommendations provided in Mr. Chen's expert evidence. Thus, I consider the request with amendments as an appropriate way to achieve the purpose of the Act.

5.3 INFRASTRUCTURE CAPACITY AND ADEQUACY

- 5.3.1 The Section 32 evaluation includes an assessment of the PPC18 infrastructure requirements, including water and wastewater supplies, stormwater management, and power and telecommunication connections. This is supported by an Infrastructure Servicing Report prepared by Eliot Sinclair, a Water Supply Design Report prepared by Eliot Sinclair, and a Hydraulic Result Summary prepared by Iota. A Water Supply Assessment prepared by WSP Limited was undertaken in response to the request for further information. The Infrastructure Servicing Report covers a range of matters, including the proposal area characteristics, flooding, earthworks, stormwater, roading, and utilities. Wastewater service is proposed by a Low-Pressure Sewer (LPS) network that would discharge to the existing gravity sewer main within Cashmere Road. Water services are available via the existing water supply network. Stormwater arrangements are discussed in section 5.4.
- 5.3.2 In response to Council's request for clarification regarding the proposed water supply arrangements, the applicant confirmed that the development will adopt the recommendations contained within the WSP Cashmere Park Residential Development Water Supply Assessment (11 November 2023), which was commissioned by the Council.
- 5.3.3 The proposed ODP includes the provision of an existing reserve, Kaiwara Reserve, as well as four Stormwater Management Areas, which are proposed to be used for stormwater management, recreation and conservation. The proposal does not include the provision of commercially zoned land or community facilities.

Submissions Received – Infrastructure capacity and adequacy

- 5.3.4 Fifty-three (53) submission points cover Infrastructure capacity and adequacy which in summary cover:

- Support PCC18 on the basis that, while some infrastructure constraints are acknowledged, the area is considered capable of accommodating additional residential growth if supported by appropriate infrastructure upgrades.
- Multiple submitters Are neutral to the proposal but seek relief that infrastructure and community facilities are provided in step with development., including upgrades to water and wastewater services, the use of development contributions to address infrastructure deficiencies, and measures to address school capacity through the provision of a new secondary school, land for a future secondary school, or increased capacity at existing schools. Submitters also seek the provision of local amenities such as shops, playgrounds and early childhood education facilities, the rezoning of all of Kaiwara Reserve to Open Space Community Park, the upgrading of Kaiwara Reserve, and assurances that the proposal will only proceed where adequate provision is made for current and future infrastructure needs.
- Ministry for Education (MoE) is neutral to the proposal and seek an amendment to the Hendersons Outline Development Plan requiring consultation with the Ministry of Education regarding the development, staging, and timing of the proposal. Whilst I acknowledge that it is important for the MoE to understand staging of land developments, I understand there to be existing partner liaison processes in place between Council and MoE, that will ensure such information is shared on an annual basis.
- Oppose the proposal on the basis that existing infrastructure is insufficient to support further growth. Key concerns relate to the capacity of water, wastewater and education infrastructure, with submitters stating that schools are already under pressure, additional school capacity and land for future schools is required, and that infrastructure upgrades have not kept pace with recent development. Submitters are also concerned that further growth would exacerbate existing infrastructure constraints, including ageing water infrastructure, school zoning issues, and associated impacts on local communities and families.
- Oppose the proposal and seek alternative relief including demonstrating sufficient capacity in water supply, wastewater, stormwater, and other infrastructure networks; completing or funding necessary infrastructure upgrades; and ensuring that existing residents do not experience reduced service levels, including water pressure. Submitters also seek provision of land and facilities for schools, early childhood education, healthcare, parks, and other community amenities, supported by appropriate development contributions. Additional relief sought includes reducing development intensity through lower-density zoning or larger lot sizes, reconsidering the proposal's impacts on surrounding residents, particularly along Sparks Road, and, in some cases, declining or postponing the proposal until

infrastructure and community facility requirements have been adequately addressed.

Analysis - Infrastructure capacity and adequacy

Wastewater and Water

5.3.5 In regard to effects on wastewater and water supply infrastructure, I rely on the evidence of Ms. Michele McDonald, Team Leader – Asset Planning Water and Wastewater at Christchurch City Council. Ms. McDonald provides the following advice with respect to wastewater and water supply associated with PPC18:

- In relation to water supply, the existing network intended to service development enabled by PPC18 does not have sufficient capacity to accommodate additional demand enabled by PPC18 without upgrades to both the internal and external feeder network.
- Ms. McDonald outlines that Council has provided for limited development within Area 4A of the Hendersons Development Plan to be serviced via the existing DN100 connections to the Hoon Hay Road water main. Hydraulic modelling confirms that these connections do not have capacity to support the additional demand that would be generated by development enabled under PPC18. Similarly, a proposed new connection to Sparks Road would result in the DN200 water main exceeding its available capacity.
- The comprehensive modelling undertaken using Council's validated hydraulic model, demonstrates that the proposed development enabled by PPC18 would result in reduced network pressures and increased reliance on storage within Worsley's 1 Reservoir during peak demand periods.
- To support the development enabled by PPC18 while maintaining water services for existing residents, upgrades to the water supply network are required. Without these upgrades, the effects of PPC18 would extend beyond the development area and impact the wider community, resulting in lower water pressure, reduced reliability of the water network, a greater risk of service disruptions, and increased wear on existing infrastructure.
- The wastewater servicing approach for Hendersons Basin East (Areas 4A and 4B) was established through the 2019 subdivision of 200 Cashmere Road. Council required the area to be serviced through a single wastewater system and invested in upgrades to provide capacity for the level of development anticipated under the existing structure plan. Ms. McDonald considers the applicant's Infrastructure Servicing Report does not adequately recognise that some of the existing wastewater capacity was intentionally provided for future development in nearby areas. As a result, the

capacity available to accommodate PPC18 development is less than assumed by the applicant.

- Modelling shows the existing wastewater network can accommodate the development enabled by PPC18 if capacity is carefully managed and future upgrades are carried out when needed. Ms. McDonald does not support the proposal for separate wastewater discharge points and additional odour treatment facilities. She considers this would unnecessarily duplicate infrastructure and increase long-term maintenance costs, whereas future capacity issues could be managed through upgrades to the existing wastewater network.

5.3.6 Overall, Ms. McDonald concludes that the proposed plan change can only be supported if the following matters are addressed:

- Water reticulation network upgrades required to mitigate the effects of PPC18, including upgrades in Cashmere Road, Leistrella Road, Northaw Street and Sparks Road are designed, funded and delivered by the developer.
- Sufficient wastewater capacity is retained to accommodate future development within the existing ODP Areas 4A and 4B.
- Any required wastewater network augmentation is integrated into the existing LPSS network and does not result in duplicate discharge points or odour treatment facilities; and
- Appropriate planning provisions are incorporated to secure these outcomes.

5.3.7 The required water supply upgrades are not currently included in Council's Long-Term Plan. Ms. McDonald considers these works are needed because of PPC18 and should therefore be funded and completed by the developer before any new development connects to the water network.

5.3.8 Multiple submissions have expressed concern regarding the capacity of existing water infrastructure, and in particular, concerns regarding a loss of water pressure for existing residents. Evidence by Ms. McDonald states that these concerns are justified and that a reduction in water pressure is likely to occur.

5.3.9 Some submitters sought the provision of a separate water supply system and new water source to service the development rather than connecting to Council's existing reticulated network. Ms. McDonald does not support this approach, as it would be neither practical nor cost-effective. Accordingly, Ms. McDonald does not consider a separate water supply system to be an appropriate or necessary response to the development.

5.3.10 Existing wastewater infrastructure capacity was also a concern raised by various submitters. Evidence by Ms. McDonald states that modelling indicates that the existing local pressure mains would have sufficient capacity to accommodate an additional 333 residential lots from development enabled by PPC18. Ms. McDonald considers that restricting PPC18 to a maximum of

333 additional residential units would avoid any material or noticeable impact on the existing local pressure sewer customers.

- 5.3.11 In summary, I recommend those submissions seeking the proposal be rejected on the grounds of inadequate infrastructure provision, are not accepted, however only on the basis that the conditions set by Ms. McDonald are met.
- 5.3.12 Ms. McDonald does not support the applicant's proposed change to the ODP Text in paragraph 6c as she considers that it is not relevant to PPC18. Ms. McDonald states that the servicing of Areas 4A and 4B was agreed at the time of subdivision of 200 Cashmere Road as provided for in the ODP.
- 5.3.13 I support Ms. McDonalds' recommended amendments to the PPC18 ODP to ensure that the intended water and wastewater network outcomes arising from the rezoning are achieved through any subsequent consenting processes, should the rezoning be approved. These proposed amendments are evaluated in Table 4 and recorded in the schedule of amendments Appendix 2.
- 5.3.14 It is proposed that the following development requirement, being 8.10.18.D.(a).(6), is added to the Hendersons Outline Development Plan narrative as follows:

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

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

- a. *Upgrade 307 metres of DN100 AC (installed 1957) water main in Leistrella Road between 26 Leistrella Road and the Hoon Hay Road water main.*
- b. *Upgrade 499 metres of DN100 CI (installed 1956) water main in Cashmere Road between Leistrella Road and the Hoon Hay Road water main.*
- c. *Upgrade 218 metres of DN100 AC (installed 1962) water main in Northaw and Rydall Street between 15 Northaw Street and the Sparks Road water main.*
- d. *Upgrade 256 metres of DN200 CI (installed 1957) water main in Sparks Road between the proposed new connection and the Hoon Hay Road water main.*
- e. *Upgrade those sections of the vested DN180 PE100 water main in Leistrella Road that are required to achieve the hydraulic performance standards identified in Council's modelling assessment; and*
- f. *Any additional works demonstrated through detailed design to be necessary to maintain Council's design standards, levels of service and network resilience.*

(e). Wastewater servicing shall be designed and managed to ensure that sufficient network capacity is retained to accommodate future development within the balance of Areas 4A and 4B, including provision for 80 additional residential units.

(f). Any wastewater network augmentation required as a result of development enabled by PPC18 shall be integrated with the existing local pressure sewer network and existing discharge point.

(g). Development shall not establish additional wastewater discharge points, separate odour treatment facilities, or other standalone wastewater infrastructure unless it can be demonstrated, to the satisfaction of Council, that integration with the existing LPSS network is not practicable.

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

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

5.3.15 It is proposed that the Henderson Structure Plan (ODP) be amended to include a new Area 4C, encompassing the PC18 proposal area. The purpose of Area 4C is to identify the land to which the specific ODP provisions recommended through this plan change apply. It is proposed that area 4C encompasses the properties that form the proposal area.

5.3.16 These proposed additions are evaluated in Table 4 and recorded in the schedule of amendments Appendix 2.

Schooling

5.3.17 There are a number of submissions that express concerns regarding pressure on schools arising from the proposal and seek the provision of additional land for schooling. The provision and zoning of schools are matters that fall outside the Council's statutory functions and are the responsibility of the Ministry of Education. The Ministry has lodged a neutral submission noting that the additional residential capacity enabled by Private Plan Change 18 has the potential to place increased pressure on the capacity of the Christchurch school network. The Ministry submits that information relating to the timing, staging, and development of the proposed growth area would assist it in understanding and planning for any implications for the surrounding school network. Whilst I acknowledge that it is important for the MoE to understand staging of land developments, I understand there to be existing partner liaison processes in place between Council and MoE, that

will ensure such information is shared on an annual basis. As such, I recommend that this submission be rejected.

Community Facilities and Amenities

- 5.3.18 Some submitters seek the provision of land for early childhood education facilities, healthcare services, and community amenities such as local shops. While the proposal does not include any commercial zoning, the Residential New Neighbourhood (RNN) Zone already provides for a range of community facilities, healthcare services, and early childhood education facilities as permitted activities, subject to compliance with the relevant standards. In addition, convenience activities are provided for as restricted discretionary activities within the zone.
- 5.3.19 Further, the establishment of these activities is generally driven by private investment rather required through regulatory direction. Should there be sufficient demand, the enablement provided for under the District Plan may be realized.
- 5.3.20 I do not consider it appropriate to require additional community facilities in the ODP and thus I recommend that submissions relating to the provision of early childhood education facilities, healthcare services, and community amenities such as local shops be rejected.

Parks and Reserves

- 5.3.21 Mr. Peter Barnes, Senior Parks and Policy Planner at Council has prepared evidence that is in Appendix 8 of this Report that records his opinion on the Neighbourhood Parks provision in PPC18.
- 5.3.22 Mr. Barnes notes that PPC18 does not propose any new Neighbourhood Parks within the plan change area. However, he observes that several existing Neighbourhood Parks are already located around the periphery of the ODP area, including Francis Reserve on Cashmere Road, Kaiwara Reserve between Kaiwara Street and Leistrella Road, and Rydal Reserve on Rydal Street. In his view, these existing reserves provide adequate open space opportunities for future residents and are located within reasonable walking distance of the proposed development. Mr. Barnes considers that access to these parks will be consistent with Council's level of service requirements, with approximately 80% of future residents expected to be located within 500 metres of a Neighbourhood Park. As such, I recommend that submissions relating to inadequate provision of local parks be rejected.
- 5.3.23 Mr. Barnes also supports the recreation routes and pedestrian/cycle links proposed within PPC18, noting that they will provide valuable recreational and active transport opportunities between Cashmere Road and Sparks Road. He considers these connections will improve accessibility for walkers, cyclists, and other recreational users and contribute positively to the overall open space and movement network within the area.

- 5.3.24 Mr. Barnes notes an outdated ODP development requirement. Requirement 8.10.18.D.(3).(e). refers to a future extension of Kaiwara Reserve; however, this extension was completed in 2022 and is therefore no longer relevant. The requirement also refers to the potential extension of a road through Kaiwara Reserve and the consequent need for a replacement reserve area further to the south. Mr. Barnes considers that subsequent development of the surrounding transport network means that a road connection through Kaiwara Reserve is no longer a realistic or logical option. Accordingly, Mr. Barnes recommends that requirement 8.10.18.D.(3).(e). be removed from the ODP narrative. There have also been submissions requesting the removal of this requirement, and I recommend that these submissions be accepted.
- 5.3.25 The removal of the ODP reference to the extension of a road through Kaiwara Reserve has been evaluated in Table 3, as evidence by Mr. Chen also supports the removal of this development requirement and raised this within his traffic evidence.

s32AA Amendments – Infrastructure capacity and adequacy

Table 4 – Evaluation of recommended changes - Infrastructure capacity and adequacy

Changes to PCC18 proposed amendments	Effects and evaluation of changes
Addition of wastewater and water supply development requirements, and associated note to the development narrative, under 8.10.18.D.(a).(6) WATER AND WASTEWATER	The proposed changes are considered effective and efficient as they ensure that development occurs only where adequate water and wastewater servicing can be provided. This will help maintain the capacity and performance of existing infrastructure networks, including ensuring that an appropriate level of water supply is retained for existing residents. The changes will support the coordinated and sustainable provision of infrastructure while avoiding adverse effects on existing users.

Recommendations – Infrastructure capacity and adequacy

- 5.3.26 On the basis of the above evaluation and as recorded in Appendix 3, I recommend that the submissions received on Infrastructure capacity and adequacy are accepted and rejected.

5.4 FLOODING AND NATURAL HAZARD RISK

- 5.4.1 The Section 32 evaluation includes an assessment of the geotechnical ground conditions and flooding associated with the PCC18 proposal area. Eliot Sinclair has prepared an Infrastructure Servicing Report, and stormwater modelling has been undertaken and a report provided by DHI. A geotechnical report has been prepared by Geotech Consulting Ltd, which concluded that the proposal area was geotechnically suitable for rezoning for residential subdivision and the

construction of housing, and that further ground investigations will be needed at subdivision consent stage as well as building consent stage.

Submissions received – Stormwater, flooding and natural hazard risk

5.4.2 Seventy (70) submission points cover flooding and natural hazard risk, which in summary:

- Support PCC18 as it will improve stormwater and water catchment management.
- Support PPC18 but would like to see the extent of development around the Stillwell's Drain reduced to provide more area for stormwater management.
- Hold a neutral position but seek to ensure that growth resulting from the proposal is adequately supported by infrastructure and environmental mitigation measures. Submitters seek protection and enhancement of wetland areas, including retaining existing wetlands, increasing protected wetland areas in line with development growth, and naturalising the existing drain network to help manage flooding and improve environmental outcomes.
- Oppose the proposal and seek alternative relief including stronger stormwater and flood management measures before any development proceeds. Concerns raised are on the already flood-prone area and the potential for further urbanisation to increase flood risk and place further pressure on existing stormwater and drainage systems. Submitters consider that the removal of stormwater ponding areas, pervious surfaces, and natural flood storage functions, particularly within Henderson Basin, could worsen flooding, increase stormwater runoff, and adversely affect existing neighbouring and downstream properties. Submitters argue that flood risk has not been adequately addressed, particularly given existing issues such as surface ponding, sewer overflows, drainage constraints, high groundwater levels, and ageing infrastructure that is already operating under strain. Concerns are raised that proposed development, and housing intensification would increase impermeable surfaces, redirect floodwaters, and exacerbate existing flooding problems without certainty that necessary infrastructure upgrades will be delivered. In addition, submitters consider that the proposal does not sufficiently account for future flood risks, cumulative effects, climate change, or other natural hazard risks such as liquefaction and subsidence. Several submitters contend that residential development should not occur within flood-prone areas or Flood Management Areas where significant uncertainty remains, and that rezoning should not proceed until there is confidence that flood risk can be appropriately managed and infrastructure capacity is available.

Analysis – Flooding and natural hazard risk

- 5.4.3 The PCC18 proposal area is subject to several CDP Natural Hazard overlays, including the Flood Management Area, Flood Ponding Management Area, High Flood Hazard Management Area and Liquefaction Management Area (LMA).
- 5.4.4 A peer review of the request and associated Infrastructure Servicing Report prepared by Eliot Sinclair and Cashmere Park Extension Modelling undertaken by DHI has been carried out by Mr. Brian Norton, Senior Stormwater Planning Engineer that is in Appendix 5.
- 5.4.5 Mr. Norton's evidence addresses flood hazard risks associated with PCC18, noting the proposal areas location being partially located within the northwestern corner of a large natural depression historically referred to as "Hendersons Basin".
- 5.4.6 Mr. Norton notes, to protect new dwellings from flooding, the minimum land levels for new development should be based on the 1 in 200 year "max of max" flood prediction 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.
- 5.4.7 While additional detailed stormwater management design will be required at time of subdivision, Mr. Norton agrees with DHI's findings that the development is unlikely to provide a measurable increase in flood levels affecting other properties.
- 5.4.8 Mr. Norton recommends a condition requiring that the final engineering design be tested again in the Heathcote model, using the Council's standard 50 and 200-year future development scenarios, including climate change, to confirm any effects.
- 5.4.9 Mr. Norton considers that the PCC18 proposal area is able to mitigate its effects on downstream flooding by providing sufficient onsite stormwater storage and by providing compensatory flood storage for any proposed filling of land within the existing floodplain.
- 5.4.10 Mr. Norton states that the PCC18 proposal area can protect new dwellings from existing flood hazards by raising the land to an appropriate level.
- 5.4.11 Mr. Norton concludes that the modelling undertaken by the DHI, using Council's Heathcote River Hydraulic model indicates that peak flood levels are maintained or reduced in all of the major local and downstream ponding areas.
- 5.4.12 Mr. Norton states that the stormwater treatment systems (first flush basins and wetlands) 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).
- 5.4.13 Mr. Norton states 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 require that any

earthworks undertaken within existing or future floodplain areas provide sufficient compensatory flood storage to offset the loss of floodplain capacity, avoid increasing flood risk to adjacent properties, and maintain the flood storage function of the Hendersons Flood Ponding Management Area.

- 5.4.14 The ODP narrative is recommended by Mr. Norton to include an amendment requiring all stormwater management areas and land needed for compensatory flood storage, to be vested in Christchurch City Council as reserve land. This will ensure long-term protection from future earthworks or development that could compromise their function. In addition, minimum land and floor levels for new development must be based on the predicted 1-in-200-year flood event, with residential finished floor levels set at least 400 mm above the peak flood level.
- 5.4.15 In response submissions that support PCC18 as it will improve stormwater and water catchment management, evidence by Mr. Brian Norton indicates that the modelling undertaken by the developer's consultant, using Council's Heathcote River Hydraulic model indicates that peak flood levels are maintained or reduced in all of the major local and downstream ponding areas.
- 5.4.16 Many submitters raise concerns regarding downstream effects of the development. Mr. Norton considers that the proposal area is able to mitigate its effects on downstream flooding by providing sufficient onsite stormwater storage and by providing compensatory flood storage for any proposed filling of land within the existing floodplain.
- 5.4.17 A concern expressed in submissions was the increase of flood risk on adjoining properties, particularly those located along Sparks Road on the Northern Boundary of the subject proposal area, by way filling land and altering local drainage patterns. Mr. Norton states local boundary drainage matters are a common issue with new subdivision development and are routinely addressed through conditions of resource consent. Mr. Norton acknowledges that filling within an existing floodplain has the potential to displace floodwaters, which could increase the extent, depth, or duration of flooding on neighbouring properties if not appropriately managed. However, Mr. Norton advises that these potential adverse effects can be effectively mitigated through the design and implementation of compensatory flood storage within the floodplain, achieved through earthworks elsewhere within the proposal area.
- 5.4.18 Submitters residing in streets surrounding the proposal area have raised concerns regarding existing surface water flooding and stormwater drainage constraints within their local areas. While these existing issues are recognised, Mr. Norton considers that they are largely attributable to the design and performance of the current drainage system rather than the development proposed by PCC18. Mr. Norton considers the proposed stormwater management measures, including the provision of new drainage infrastructure within the proposal area and the management of upstream stormwater flows, will ensure development runoff is appropriately managed and is not expected to adversely affect flood risk or stormwater network performance in surrounding streets.

Mr. Norton states that in some locations, the proposed diversion of upstream flows may potentially provide additional capacity within parts of the existing drainage network, resulting in localised improvements to drainage performance. Therefore, I recommend that these submissions are rejected in part.

- 5.4.19 Many submissions request alternative relief by way of changing the stormwater management design, upgrading existing infrastructure outside of the subject proposal area and setting aside more land for flooding mitigation. Mr. Norton's evidence demonstrates that the development anticipated by this Plan Change is capable of appropriately managing and mitigating stormwater and flooding effects, provided the recommended ODP development requirements are implemented, including compensatory flood storage within the floodplain and the application of minimum floor level controls. As such, no changes to the stormwater management design or other infrastructure upgrades are required. I therefore recommend that these submissions are rejected.
- 5.4.20 In relation to submissions discussing climate change and sea level rise, Mr. Norton notes that the effects of climate change have been considered through the Council's Heathcote Citywide hydraulic modelling. I refer again to Mr. Norton's evidence which states that the proposal area is at a sufficient elevation that the range of sea level rise scenarios assessed does not influence peak flood levels affecting the land. Mr. Norton does, however, recommend an ODP development requirement requiring the final engineering design to be tested in the Council's Heathcote model using the standard 50-year and 200-year future development scenarios, including climate change assumptions. Should that assessment identify any unanticipated adverse flooding effects, Mr. Norton considered that additional compensatory storage or other appropriate mitigation measures can be incorporated into the final design to address those effects.
- 5.4.21 The proposed amendments recommended by Mr. Norton are evaluated in Table 5 and recorded in the schedule of amendments Appendix 2.
- 5.4.22 It is proposed that the Hendersons Outline Development Plan, 8.10.18.D.a.(5) is amended as follows:

(e). Any proposed earthworks within the existing or future floodplain includes compensatory storage sufficient to:

- i. *offset the loss of live flood storage.*
- ii. *ensure that the development will not displace flood waters onto adjacent low-lying properties; and*
- iii. *ensure the flood volume of the Hendersons Flood Ponding Management Area is not reduced.*

(f). That all stormwater management areas and all areas that are required to provide compensatory flood storage vest to the Christchurch City Council as reserves as a measure to protect them from future earthworks or development, and;

(g). That minimum land levels for new development shall be based on:

- i. the 1 in 200 year “max of max” flood prediction; and
- ii. sufficient height to allow finished floors of new dwellings to achieve this peak water level plus 400 millimetres of vertical freeboard.

5.4.23 These proposed additions are evaluated in Table 5 and recorded in the schedule of amendments Appendix 2.

5.4.24 Mr. Charters considers, with respect to geotechnical risks associated with PCC18, that the proposal area 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.

5.4.25 In relation to submissions regarding geotechnical risks, evidence provided by Mr. Charters states that the proposal area’s geotechnical conditions are not considered significantly worse than many other parts of Christchurch, and that detailed assessment of lateral spreading effects on both new and existing infrastructure should occur at the resource consent stage. Mr. Charters states that Mr. Traylen’s report is of a high standard, requiring only minor clarifications, while noting that further proposal area-specific geotechnical investigations will be needed as the plan change process advances. As such, I recommend submissions relating to geotechnical effects be rejected.

S32AA Amendments – Flooding and natural hazard risk

Table 5 – Evaluation of recommended changes - Flooding and natural hazard risk

Changes to PCC18 proposed amendments	Effects and evaluation of changes
Addition of stormwater development requirements, under 8.10.18.D.a.(5). STORMWATER	The proposed amendments are considered both effective and efficient, as they ensure that development on the proposal area is able to appropriately avoid, remedy, or mitigate flooding and stormwater effects. In particular, the amendments require measures to maintain flood storage capacity and prevent the transfer of flood risk to adjoining properties, thereby supporting the sustainable management of the wider catchment. The proposed provisions are also appropriately located within the Development Requirements section of the District Plan, where users would reasonably expect to find proposal area-specific flood management and development

	controls. This improves the usability of the District Plan and provides greater certainty for plan users regarding the requirements that must be met as development proceeds.
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- 5.4.26 On the basis of the above evaluations and as recorded in Appendix 3, I recommend that the submissions received on flooding and natural hazard risk are accepted, accepted in part, rejected or rejected in part.

5.5 LOSS OF RURAL LAND AND URBAN GROWTH

- 5.5.1 The section 32 evaluation provides an assessment of the proposal against the National Policy Statement on Urban Development (NPS-UD), which is a key consideration in determining the appropriateness of the proposed rezoning. The proponent considers that the proposal gives effect to Policy 8 of the NPS-UD, as will add significantly to development capacity and contribute to a well-functioning urban environment. To support this conclusion, the proponent submitted an Economic Impact Assessment (2023) prepared by Formative Limited, which has since been updated.

- 5.5.2 The update to the Economic impact assessment made the following conclusions:

- The plan change is required to ensure that there is sufficient residential development capacity within the locality within the next ten years, and to enable Council to meet its obligations under the NPS-UD.
- Urban rezoning of the Proposal area would be consistent with clause 3.6 of the NPS-HPL and would give effect to the NPS-UD's objective to provide at least sufficient development capacity.

- 5.5.3 The section 32 evaluation also assesses the proposal against the National Policy Statement for Highly Productive Land (NPS-HPL), which is another key statutory document relevant to determining the appropriateness of the proposed rezoning, given that the proposal involves land identified as highly productive. The proponent considers that the proposal satisfies the requirements of clause 3.6 of the NPS-HPL. In response to a request for further information, the proponent provided an assessment of the proposal against clause 3.6(c) of the NPS-HPL prepared by Agribusiness Group, which concluded the environmental, social, cultural and economic benefits of the rezoning outweigh the long-term environmental, social, cultural and economic costs associated with the loss of highly productive land.

Submissions received – Loss of rural land and urban growth

- 5.5.4 Thirty-eight (38) submission points cover loss of rural land and urban growth, which in summary:

- Support PCC18 on the grounds the proposal will increase housing supply, choice, and affordability in a sustainable location close to Christchurch. Submitters consider the area well suited for urban development due to its proximity to the city, transport links, employment, and services, and argue that the benefits of providing housing outweigh the loss of underutilised rural land. Submitters note strong demand for residential land, potential economic benefits, and the opportunity to accommodate growth more efficiently than expanding into more distant areas.
- Support PCC18 where it is rezoned Medium Density Residential zoning.
- Support the proposal but seek alternative relief including increasing development density to accommodate more than 300 dwellings and incorporating low- to mid-rise apartments, requiring a proportion of housing to be affordable or targeted to first-home buyers.
- Oppose PCC18 due to the loss of productive rural and highly versatile agricultural land, which they consider inconsistent with national policy and important for future food production. Some submitters specifically requested that the site remain available for primary production rather than being developed for housing. Submitters cite the sufficiency of housing that already exists within Christchurch and the local area, reducing the need for additional greenfield development. Concerns were raised about the area being outside planned growth areas, potential inconsistency with planning policy and the cumulative effects of ongoing subdivision and housing development in the area.

Urban Growth

- 5.5.5 18.9 hectares of the proposal area identified as suitable for residential development. The proposal could range between 280 to 340 dwellings depending on the final development configuration. The may be subject to change at the detailed design stage, but the minimum density must yield 15 dwellings per hectare.
- 5.5.6 The proposals alignment with the NPS-UD is discussed in full in Section 6.3.3. The proposal area is considered an “urban environment” for the purposes of the responsive planning pathway under Policy 8, as it meets the definition in the NPS-UD. The proposed RNN zoning indicates the proposal area is intended to be predominantly urban in character, and its location within Christchurch City places it within a housing and labour market exceeding 10,000 people, satisfying both limbs of the definition. The subject land requires evaluation under Policy 8 of the NPS-UD as it represents an unanticipated development for the specific land area, however in my view account should be given to the overall direction for urban development to be enabled within the Halswell area under the South-West Christchurch Area Plan and Christchurch District Plan. Given the limited remaining greenfield capacity in Christchurch (less than 7 years supply), the proposal makes a meaningful contribution to meeting the proposal would make a meaningful contribution to meeting medium-term greenfield housing demand. Furthermore, the rezoning would support a well-functioning

urban environment by providing greenfield housing, offering good access to employment, services, and open space, and enabling a range of transport choices. Overall, I consider the proposal aligns with Policy 1 outcomes by contributing to housing diversity, accessibility, and reduced greenhouse gas emissions, supporting its suitability for rezoning.

- 5.5.7 The economic evidence provided by Mr. Yeoman acknowledges the areas location as being well location to accommodate urban growth in Christchurch with local demand for housing. Mr. Yeoman notes: “demand for new housing in this locality is projected to be mostly focused on standalone dwellings. In response to the submission that there is sufficient housing intensification within Christchurch City and that the proposal is therefore unnecessary. The NPS-UD requires Council to provide for a diverse range of housing choices, of which greenfield development providing for standalone homes forms part of.
- 5.5.8 Housing choice is a key characteristic of a well-functioning urban environment, to which the proposal must contribute to, in accordance with Policy 8 of the NPS-UD. As such, I recommend that submissions relating to increased housing supply and choice within a sustainable location be accepted.
- 5.5.9 In response to submissions preferring that housing density be guided by market demand rather than minimum density requirements, or zoning the proposal area medium density, it is noted that the RNN zoning provides for a minimum density of 15 households per hectare but does not preclude development at higher densities, where this can be achieved in accordance with the relevant RNN provisions. The proposal therefore aligns in my view, with the CDP Strategic Direction Objective 3.3, which seeks to ensure a range of housing opportunities, including affordable, community, and social housing. I concur with the, urban design evidence provided by Mr. Hattam supports the appropriateness of the RNN zoning in this location, given the areas context and connectivity with adjoining residential neighbourhoods.
- 5.5.10 Mr. Yeoman states that, on this basis, residential development of the proposal area is likely, on balance, to result in the delivery of relatively more affordable dwellings compared to other locations within the city. Mr. Yeoman notes that, while the inclusion of a specific affordable housing component could further support affordability outcomes, any such provision would require appropriate mechanisms, such as consent conditions or other implementation tools, to ensure they are delivered in practice.
- 5.5.11 I further note that the RNN zoning framework provides a pathway for affordable housing options should developers or housing providers choose to pursue them. In combination with the anticipated increase in housing supply, the proposal is therefore considered to support, rather than undermine, housing affordability. I therefore recommend that submissions seeking to require the imposition of affordable housing be rejected.

- 5.5.12 A number of submissions have been received from other rural landowners in the surrounding area who consider that their properties should also be included within the proposal area and have requested that the Council facilitate discussions regarding the future development of their land. The proposal relates solely to the rezoning of the identified proposal area and therefore an evaluation of additional areas is outside the scope of this proposal.
- 5.5.13 Landowners who wish to pursue the rezoning of their own land may do so through a future Council-led plan change process or by lodging a separate private plan change request. Accordingly, I do not consider that the relief sought by these submitters can be achieved through the current proposal, and I recommend that these submissions be rejected.

Rural land

- 5.5.14 Submissions consider that the broader community benefits of urban expansion outweigh the loss of underutilised rural land. The proposal area is identified as highly productive land for the purposes of the NPS-HPL. The NPS-HPL establishes a national direction that prioritises the protection of highly productive land for primary production. The proposal must be considered in the context of the NPS-HPL clause 3.6, which examines the economic, cultural, environmental, and social costs and benefits of the proposal.
- 5.5.15 Submissions raise concerns regarding the loss of rural land and subsequent limiting of future primary production. The report prepared by The Agribusiness Group concludes that the proposal area is subject to a range of constraints that limit its suitability for productive farming. While the soils are inherently high quality, their drainage restricts their use, particularly for intensive farming and winter grazing. The absence of irrigation is a significant limiting factor, as the proposal area is located within an overallocated groundwater zone where new water takes are not permitted, thereby constraining the viability of arable and horticultural activities and reducing summer productivity for pastoral uses.
- 5.5.16 The relatively small scale of the landholding further limits its economic viability for commercial farming, particularly in the absence of integration with a larger operation. In addition, the proposal area is bordered by residential development, giving rise to reverse sensitivity effects, which constrain typical farming activities due to potential conflicts related to noise, odour, and dust. These factors, together with the high costs associated with intensification of the proposal area's productivity and logistical challenges for arable use, mean that, in practice, the proposal area is not well suited to efficient or commercially viable farming, and is more likely to support only low-intensity or lifestyle grazing. The proposal area's constraints mean that its potential to support meaningful or sustained primary production is already significantly limited. As such, I recommend that submissions regarding the loss of rural land and subsequent limiting of future primary production be rejected.

Recommendations – Loss of rural land and urban growth

- 5.5.17 On the basis of the above evaluations and as recorded in Appendix 3, I recommend that the submissions received on loss of rural land and urban growth are accepted or rejected.

5.6 NATURAL VALUES EFFECTS AND SOCIAL EFFECTS ON EXISTING RESIDENTS

- 5.6.1 The Ecological assessment prepared by Instream Consulting concludes the proposal would result in a net improvement for aquatic ecology values.
- 5.6.2 In regard to social effects, the Section 32 report and supporting urban design statement raise benefits of the proposal as including improved active mode connectivity, walkability, accessibility, and integration with the surrounding urban area. Whilst, these are principally representative of achieving good urban form, they will support community connectivity, access to services and amenities, and the wellbeing of residents.

Submissions received – Natural values effects

- 5.6.3 Twenty-four (24) submission points cover environmental effects and social effects on existing residents, which in summary:
- Support PPC18 as it is expected to deliver environmental and ecological benefits, including increased native planting, wetland creation, and other mitigation measures that could enhance biodiversity and improve the proposal area's environmental values.
 - Support PCC18 where it is approved with Medium Density Zoning.
 - Oppose the PPC18 due to concerns about potential environmental effects, including contamination risks and impacts on local wildlife and birdlife.
 - Oppose PCC18 and seek alternative relief including stronger consideration of the social, environmental, and wellbeing effects of the proposal, including ensuring that any risks or adverse effects are not transferred to existing residents. Specific requests included protecting natural springs, retaining land for flood mitigation purposes (including potential public acquisition), engaging directly with affected residents to discuss concerns, and ensuring wetland and swale systems are designed to support natural hydrological and ecological functions by directing runoff to enhance wetland performance.

Analysis – Natural values effects

Natural values effects

- 5.6.4 A number of submitters have expressed concern that the proposed plan change could adversely affect indigenous biodiversity, including birdlife, freshwater habitats, and nearby wetlands. The Instream Consulting report notes that there are no known wetlands or sites of ecological significance within the development footprint. Existing waterways within and adjacent to the proposal area are highly modified drainage channels with limited ecological values, poor instream habitat, minimal native riparian vegetation, and aquatic communities typical of urban Christchurch waterways. Evidence by Mr. Crossland states that the Instream Consulting report accurately describes the landscape and habitat characteristics. Evidence by Mr. Crossland demonstrates that the proposal area has, for at least the past decade, supported only a small bird population of limited conservation importance and that the proposed plan change is unlikely to have a significant effect on avian biodiversity because many former bird populations have already declined or shifted to more suitable habitat elsewhere within the wider basin.
- 5.6.5 Submitters have raised concerns regarding the protection of wetlands and habitats. The evidence confirms that a wetland complex of ecological significance exists to the west of the proposal area. Both the Ecological Assessment by Instream consulting and the evidence provided by Mr. Crossland confirm that this wetland lies outside the Cashmere Fields development footprint. The mapped wetland is located more than 200 metres from the proposal area and is separated from much of the development area by existing drainage channels, reducing the risk of direct ecological effects.
- 5.6.6 The ecological evidence also identifies opportunities for positive biodiversity outcomes arising from future development. Rather than resulting in a loss of ecological values, the proposed development provides for the naturalisation and enhancement of Stilwell's Drain. Recommended measures include replacing engineered drain edges with more natural channel forms, establishing indigenous riparian planting, increasing habitat diversity through riffles, pools and meanders, and enhancing habitat for native fish species, including species classified as At Risk-Declining. The Instream report concludes that, if these measures are implemented, the plan change has the potential to result in a net improvement in aquatic ecological values compared with the current state of the waterways.
- 5.6.7 Evidence by Mr. Crossland also recommends ongoing protection and enhancement of the adjacent significant wetland habitat through measures such as waterway enhancement, riparian planting, establishment of buffer vegetation, and controls on domestic cat and dog access. Mr. Crossland does not recommend any changes to the ODP and associated narrative.
- 5.6.8 The Ecological Assessment by Instream consulting and the evidence provided by Mr. Crossland concludes that the significant wetland habitats are located outside the development footprint, are not directly affected by the proposed rezoning, and can be protected through further assessment, design controls, waterway enhancement, stormwater management measures, and ecological mitigation at subsequent stages of development. On this basis, it is considered that the proposed plan change will not result in significant adverse effects on indigenous biodiversity, ecologically

significant habitats, or wetlands. As such, I recommend that submissions related to the protection of wetlands and habitats be rejected.

Land Contamination

- 5.6.9 Submissions have raised concerns regarding soil contamination and naturally occurring contaminants. The possibility of the proposal area containing contaminated soil is addressed by the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (NESC). The Preliminary Proposal area Investigation undertaken by Elliot Sinclair concludes that: "HAIL activities have historically and currently been carried out on the proposal area. However, given the proposed activity being a plan change, which will involve no soil disturbance or immediate land use change, it is highly unlikely that it would create any risks to human health. However, Areas or Locations of Interest (LOI) have been outlined and would require to be further investigated should future projects intercept those areas/locations." The requirements of the NESC 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 NESC. Therefore, I recommend these submissions be rejected on the basis that future processes will adequately manage any land contamination issues.

Recommendations – Natural values effects and social effects on existing residents

- 5.6.10 Based on the above evaluations and as recorded in Appendix 3, I recommend that the submissions received on natural values effects and social effects on existing residents are accepted in part or rejected.

5.7 AMENITY EFFECTS, URBAN DESIGN AND LANDSCAPING

- 5.7.1 The Eliot Sinclair Urban Design statement concludes that the proposed replacement Outline Development Plan has been carefully developed to respond to the proposal area's landscape, environmental, and cultural context, while providing for residential growth in a manner that maintains amenity and supports connectivity. Therefore, the request achieves a high-quality urban form that aligns with the objectives of the NPS-UD and delivers a well-integrated and livable neighbourhood. The section 32 report assesses the interface between the proposed development area, adjoining residential, rural land, and landscape effects.
- 5.7.2 The proponent considers that the ODP incorporates a range of design elements that appropriately address landscape and visual effects, including the alignment of accessways, the retention of viewshafts towards the rural area and Port Hills, pedestrian and cycle connections to surrounding neighbourhoods, and the location of roads and publicly accessible spaces adjacent to stormwater management and floodplain areas. I agree with the proponents assessment that these measures

would be sufficient to address potential landscape and visual effects and that no additional provisions beyond the proposed ODP are necessary.

- 5.7.3 I note that Council incorrectly summarized the primary relief sought by submitter Walker on behalf of Individual and collective group of Sparks Road residents (S22). The submission did contain various alternative reliefs which were accurately recorded, however the submissions stated primary relief was *“the Rural Urban Fringe (RuUF) be extended to include the area directly behind our properties”*, which refers to the area along the northern boundary of the proposal area, to the south of the existing residential properties along Sparks Road.

Submissions received – Amenity effects, urban design and landscaping

- 5.7.4 Twenty-six (26) submission points cover amenity effects, urban design and landscaping.
- Some submitters seek alternative relief including retaining and protecting some existing trees.
 - Oppose PCC18 due to concerns about the loss of the area's semi-rural character, open space, and existing amenity values, impact on the character and identity of the neighbourhood. Submitters also anticipate adverse effects from both construction and future residential development, including increased noise, dust, traffic, and disruption. Additional concerns relate to the proximity and scale of new housing, particularly two-storey dwellings, and the potential impact on residents' enjoyment of their properties and their connection to the local area.
 - Oppose PCC18 and seek alternative relief including extending the Rural Urban Fringe zoning or providing other buffer areas along the northern boundary, preventing or limiting housing development along the Sparks Road frontage, imposing stricter controls on building height, setbacks, finished floor levels, fencing, and landscaping, and ensuring privacy, shading, visual dominance, and other amenity effects are appropriately mitigated.

Analysis – Amenity effects, urban design and landscaping

- 5.7.5 A peer review of the Urban Design Statement prepared by Eliot Sinclair has been carried out by Mr. David Hattam, Senior Urban Designer at Christchurch City Council that is in Appendix 9, and Ms. Abigail Smith, Senior Landscape Architect at Christchurch City Council that is in Appendix 10 of this report.
- 5.7.6 Mr. Hattam agrees with Mr. McFarlane's conclusion that the proposal provides an opportunity to improve the peri-urban character of the area through the careful design and management of the rural-urban interface. Mr. Hattam notes that retaining existing trees, particularly those adjacent to Cashmere Road, would be beneficial given their contribution to the visual amenity and established

character of the area. He considers that these mature landscape features make a meaningful contribution to the proposal area's aesthetic values and would assist in creating a distinctive sense of place.

5.7.7 Mr. Hattam further considers that the proposal will establish a strong sense of place through the integration of the stormwater basins and channels. These features are anticipated to provide both recreational and amenity benefits for future residents. In his view, the retention of existing trees would complement these landscape elements and further enhance the character and identity of the proposed neighbourhood. Having regard to this evidence, I am satisfied that the proposal has the potential to improve the rural-urban interface and that the retention of existing trees, where practicable, would contribute positively to the amenity and character of the development. Accordingly, I recommend that submissions regarding improving the rural-urban interface and the retention of existing trees be accepted.

5.7.8 As such, I recommend that the ODP narrative development requirements 8.10.18.D.(3). be amended to include an additional provision as follows:

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

5.7.9 This proposed addition is evaluated in Table 6 and recorded in the schedule of amendments Appendix 2.

5.7.10 I agree with Mr. Hattam that the Residential New Neighbourhood (RNN) Zone is the most appropriate zoning for the proposal area, as it would provide an appropriate transition between the proposed development, adjoining open space areas, the Rural Urban Fringe Zone, and existing residential neighbourhoods. I also consider the land development guidance and requirements of the HODP that supports the RNN zoning, as compared to the Medium Density Zone provisions, will facilitate positive outcomes in terms of amenity and landscape. I recommend that submissions seeking the rezoning of the proposal area to the Medium Density Residential Zone be rejected.

5.7.11 A number of submitters have expressed concerns regarding the potential loss of views and outlook. In relation to views and outlook, I agree with Mr. Hattam that the loss of views across the proposal area is an inevitable consequence of the development of a greenfield proposal area and urban expansion. While the proposal will alter the outlook currently enjoyed by some neighbouring properties, there is no entitlement to the retention of private views across adjacent private land, also noting that views between private properties is equally not protected by the RuUF zoning in the CDP.

5.7.12 The NPS-UD anticipates and supports change within urban environments where it enables communities to respond to growth and evolving needs. Furthermore, Policy 6 of the NPS-UD states that changes to an area “may detract from amenity values appreciated by some people but

improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types” and that these changes are not considered to be an effect. Therefore, I recommend that submissions relating to views and outlook be rejected.

- 5.7.13 Concerns were also raised via submissions from existing Sparks Road residents regarding the visual dominance of new housing, the potential for overlooking of neighbouring properties, and the proximity and scale of future residential development, particularly in relation to two-storey dwellings and more intensive forms of housing. Mr. Hattam notes that similar situations occur in Leistrella Drive and within other Outline Development Plan areas, including South-West Halswell (south of Halswell Junction Road and Country Palms Drive) and South-East Halswell (Ferbane Way), where development has typically consisted of single-storey housing adjoining pre-existing Residential Suburban zoned areas. In Mr. Hattam’s opinion, these examples demonstrate that this interface can be successfully managed.
- 5.7.14 Mr. Hattam does not consider the RNN Zone to be incompatible with existing Residential Suburban neighbourhoods. In relation to privacy effects, Mr. Hattam notes that some overlooking can occur within any residential environment, including within the Residential Suburban Zone where two-storey dwellings are anticipated. The Outline Development Plan includes provisions directing lower-density development towards the edges of the proposal area adjoining existing residential areas on the northern and eastern boundaries. It also includes provision 8.10.18.C.(a).(10)., which states where existing properties are to remain, or where new residential areas adjoin rural or existing residential areas, larger section sizes and planting buffers may be required.
- 5.7.15 Mr. Hattam seeks a minor amendment to the Hendersons Outline Development Plan (ODP) narrative. He recommends deleting the reference to higher density development being anticipated “particularly at the eastern end” of Area 4a. Mr. Hattam considers that this wording could be misleading because it suggests the highest densities should be concentrated along the eastern boundary adjoining existing residential properties, whereas the application proposes that lower densities be located around sensitive residential interfaces and higher densities be focused closer to the stormwater basin and central amenity areas. Mr. Hattam considers that removing this wording would provide greater clarity, better reflect the intended urban design outcomes, and ensure the ODP supports an appropriate transition in density while protecting the amenity of neighbouring residents. I consider this change would be effective and efficient and be the most appropriate way to give effect to the purpose of the Act.
- 5.7.16 I recommend that the ODP narrative development form and design 8.10.18.C.(a).(11) be amended as follows:

(11). Higher density development, above 15 hh's/ha, is anticipated in Area 4a, particularly ~~at the eastern end and/or~~ adjacent to the stormwater basin.

- 5.7.17 This proposed amendment is evaluated in Table 6 and recorded in the schedule of amendments Appendix 2.
- 5.7.18 Several submissions oppose PPC18 because of construction effects such as noise, dust, fumes, vibrations and disruptions from earthworks. I refer to the CDP provisions that specifically manage nuisance effects by prescribing noise limits and construction phase earthworks. It is standard practice for Council to prescribe conditions on resource consents requiring development works to comply with approved Earthworks Management Plans. In my view it is therefore 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 and I recommend that the related submissions are rejected.
- 5.7.19 Ms. Smith, Council's Senior Landscape Architect, has reviewed the landscape and visual amenity effects of the proposal and, like Mr. Hattam, generally agrees with the conclusions reached by Mr. McFarlane in the Urban Design Statement.
- 5.7.20 Ms. Smith acknowledges submitter concerns regarding the loss of rural character and visual amenity. She notes that while the proposal area is a modified rural landscape with generally low to moderate natural character and visual amenity values, the openness of the landscape is highly valued by the community and contributes to its high associative value. Nevertheless, Ms. Smith considers that the change in landscape character resulting from residential development is consistent with the evolving urban context of the area and can be appropriately managed through the proposed zoning framework and refinements to the Outline Development Plan. In relation to submissions concerning loss of views and outlook, Ms. Smith accepts that visual amenity effects will occur, particularly during the construction and establishment phases of development. However, she considers that these potential adverse effects will reduce over time as stormwater basins, reserves, street tree planting and residential landscaping mature.
- 5.7.21 A number of submitters raised concerns regarding the removal of existing trees, shelterbelts and vegetation. Ms. Smith agrees that existing mature vegetation contributes positively to the character of the area. In particular, she considers that existing trees along the Cashmere Road frontage form an important component of the proposal area's transitional rural-urban character and that opportunities for retention should be explored as part of future development and consenting processes.
- 5.7.22 Ms. Smith recommends a number of amendments to the ODP plan and text to strengthen landscape outcomes, including additional references to ecological planting, green links, pedestrian connections, vegetation buffers, and open space interfaces. In considering the recommendations, I note that many relate to provisions that already form part of the operative Hendersons ODP and apply across the wider development area. These provisions were established through previous plan-making processes and continue to provide the overarching framework for development

within both the existing and proposed ODP areas. I also note that a number of the outcomes sought can be achieved through the existing ODP framework, the Residential New Neighbourhood Zone provisions, and through future subdivision and resource consent processes. On this basis, I consider that only a limited number of additional amendments are necessary to respond to the potential adverse effects raised by PPC18.

- 5.7.23 PPC18 introduces new interfaces between future residential development and established residential neighbourhoods, particularly along the northern and eastern boundaries of the proposal area. These interfaces were not contemplated within the original extent of residential development anticipated by the Hendersons ODP and this topic has received a number of submissions. However, I consider that the existing ODP narrative contains sufficient provisions to manage any potential effects in relation to this interface.

S32AA Amendments – Amenity effects, urban design and landscaping

Table 6 – Evaluation of recommended changes - Amenity effects, urban design and landscaping

Changes to PCC18 proposed amendments	Effects and evaluation of changes
The addition of ODP narrative development form and design 8.10.18.C.(a).(11)	A proposed requirement to retain existing trees within Area 4C is an effective, efficient and appropriate method of achieving positive urban design and amenity outcomes. Existing mature trees make an immediate and tangible contribution to visual amenity, landscape character and sense of place, particularly along the rural-urban interface, and their retention will help integrate new development with the established environment.
The removal of the reference in 8.10.18.C.(a).(11) regarding concentrating higher density development at the eastern end of the proposal area.	The proposed amendment is considered appropriate, effective, and efficient as it improves the clarity and usability of the provision, more accurately reflects the urban design outcomes sought through the ODP and supports a sensitive transition between differing residential densities. In doing so, it assists in managing potential amenity effects on neighbouring residents while providing greater certainty for plan users and decision-makers.

Recommendations – Amenity effects, urban design and landscaping

- 5.7.24 On the basis of the above evaluations and as recorded in Appendix 3, I recommend that the submissions received on amenity effects, urban design and landscaping are accepted in part or rejected.

5.8 TECHNICAL INFORMATION, EVIDENCE GAPS AND PROCESS

Submissions received – Technical Information, evidence gaps and process

5.8.1 Twenty-seven (27) submission points cover technical information, evidence gaps and process, which cover:

- Support PCC18 as they consider that the technical assessments provide a solid framework for managing factors like stormwater and flood risk.
- Support PCC18 but seek seeks greater certainty, transparency, and accountability regarding flood and stormwater management.
- One submitter, being the landowner of 150 Sparks Road, supports PC18 but seeks assurance that the development will not adversely affect 150 Sparks Road and will manage all flood and stormwater effects within the plan change area. They want robust and independently reviewed flood modelling, including consideration of climate change, to demonstrate that flooding, stormwater discharge, flood storage loss, and flood hazards affecting 150 Sparks Road will not increase. The submitter seeks confirmation that 150 Sparks Road is not required for flood storage, flood mitigation, or stormwater management unless agreed to by the landowner and subject to appropriate compensation. They also seek ongoing monitoring and remediation of any adverse effects, recognition as an affected party for infrastructure that may affect their property, opportunities to review and comment on flood management proposals, maintenance of existing and future access arrangements to 150 Sparks Road through appropriate roading connections or corridors, and provision for a future wastewater connection to the property.
- Oppose PCC18 as they consider that the proposal lacks clear evidence that stormwater, ground stability, and climate change impacts are adequately addressed.
- Oppose PCC18 and seek further investigation, verification, and transparency regarding the technical basis of the proposal. Requests included updating or redoing relevant reports and investigations and confirming that previously identified issues have been adequately addressed. Submitters also sought detailed and publicly available information on development plans, infrastructure servicing, stormwater management, and flood risk. Specific requests included comprehensive proposal area-specific flood and stormwater modelling, the undertaking of a new survey of the area, demonstration that development will not increase flood risk on neighbouring properties, adequate stormwater attenuation and drainage infrastructure, and consideration of cumulative effects from existing and future development in the wider area. Submitters also sought a meeting with Council staff to clarify their concerns.

Analysis – Technical information, evidence gaps and process

- 5.8.2 I note that Council incorrectly summarised the decision sought by submitter S.I. Down (S73) in relation to submission point 73.3 concerning a perceived conflict of interest involving the surveying company. In Council’s summary of decisions sought it stated that no relief or resolution was sought in relation to this submission point. However, S.I. Down did specify a requested outcome, namely that the proponent be required to commission a new survey of the area, together with any associated reports, to be undertaken by an independent company.
- 5.8.3 In relation to submissions questioning the quality and adequacy of the technical reports provided in support of the plan change request, I note that all technical assessments have been subject to peer review by the relevant Council experts, as discussed within the respective effects sections of this report. None of the peer reviews identified any significant deficiencies or errors in the technical reporting, nor did they conclude that further technical investigations or replacement reports were necessary. Accordingly, I am satisfied that the technical information provided is adequate to inform the assessment of the plan change request. For these reasons, I recommend that submissions seeking additional technical reporting or raising concerns regarding the overall quality of the applicant’s technical assessments, be rejected.
- 5.8.4 Multiple submitters requested a meeting with Council staff to discuss and clarify their concerns regarding the proposal. In response, Council’s Senior Policy Planner, Kirk Lightbody met with a group of residents currently living along Spark Road. The meeting was held at Halswell Library on 15 July 2026. During the meeting, the submitters outlined their concerns regarding the proposal. Mr. Lightbody provided information on the statutory process, including the hearing procedures and opportunities for submitters to present their views at the PPC18 hearing. As such, I recommend that these submissions seeking a meeting with Council staff be accepted.
- 5.8.5 Several submitters sought the provision of additional information relating to the proposal. The Resource Management Act 1991 establishes the information requirements and consultation processes that apply to private plan changes through the Schedule 1 process. There is no requirement within the Act for applicants to provide additional information to submitters beyond that required to support the application and enable its assessment. Accordingly, I consider that the existing frameworks under both the RMA and the Local Government Act provide appropriate and sufficient mechanisms for interested parties to access information about the proposal. For these reasons, I do not consider any further information requirements to be necessary. As such, I recommend that submissions relating to the provision of additional information be rejected.
- 5.8.6 Submission points relating to 150 Sparks Road have been made by the property owners and are primarily directed toward safeguarding the proposal area’s future development potential, including provision for a future road connection, wastewater servicing capacity, and stormwater infrastructure that could accommodate future development. However, 150 Sparks Road does not

currently benefit from development rights that would necessitate such provisions. The proposal area is zoned Rural Urban Fringe (RuUF) and is subject to significant flood hazard constraints, with the majority of the property affected by the Flood Management Area, Flood Ponding Management Area, and High Flood Hazard Management Area overlays. Mr. Norton notes that, aside from the existing dwelling platform, the proposal area is very low lying and is predicted to experience flood depths of up to approximately 900mm in a 1-in-50-year flood event, making substantive future development highly unlikely.

- 5.8.7 Given these constraints, there is no planning, transport, stormwater, or infrastructure justification for PPC18 to safeguard future development opportunities on 150 Sparks Road. Accordingly, it is not considered necessary for the ODP to provide a future road connection to the proposal area, reserve wastewater capacity within the local pressure sewer network, or design stormwater infrastructure to integrate with future development of the property. Expert evidence concludes that PPC18 will not increase flood risk to 150 Sparks Road, will not rely on flood storage being provided on that proposal area, and will not direct stormwater discharges onto the property. Any future development or rezoning of 150 Sparks Road would require separate assessment of access, servicing, infrastructure capacity, and flood management requirements at that time. Therefore, it is recommended that the submissions relating to these matters be rejected.
- 5.8.8 In regard to submissions that raise concerns regarding reduction in property values as a result of the proposal, 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. As such, I recommend that submissions relating to impacts of property values be rejected.

Recommendations – Technical information, evidence gaps and process

- 5.8.9 On the basis of the above evaluations and as recorded in Appendix 3, I recommend that the submissions received regarding technical information, evidence gaps and process are accepted or rejected.

6 STATUTORY AND OTHER INSTRUMENTS EVALUATION

6.1 PART 2 PURPOSE AND PRINCIPLES

- 6.1.1 Under s74 (1)(b), any changes to the CDP must accord with Part 2 of the RMA. Part 2 sets out the purpose of the RMA (section 5), matters of national importance that must be recognised and provided for (section 6), and other matters that “*particular regard*” is to be had (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 PPC18 does not seek to change. Rather, PPC18 seeks to rezone the request area to a combination of RNN and RuUF and to coordinate the development of the proposal area through an amended ODP and ODP narrative.
- 6.1.3 Establishing the appropriateness of the objective of PPC18 in achieving the purpose of the RMA is also a requirement under section 32, which is considered below.
- 6.1.4 The matters of national importance set out in section 6 of the RMA are assessed below in relation to the proposed rezoning. Evidence by Mr. Norton confirms that the proposal is able to mitigate any risks associated with flooding, and evidence provided by Mr. Neil Chaters states that liquefaction hazards can likely be mitigated using relatively standard geotechnical techniques (section (6)). The proposal area avoids impacting the coastal environment, lakes, wetlands and, any outstanding natural features and landscapes (section 6 (a) and (b)). Appropriate methods are available to protect any unknown sites of cultural or historic significance (section 6 (e) and (f)). The proposal area does not contain any areas of significant indigenous vegetation and/or significant habitats of indigenous fauna (section 6 (c)). The proposal does not impede public access to coastal marine areas, lakes, and rivers (section 6 (d)), or infringe upon protected customary rights (section 6 (g)).
- 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 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 considerations of PPC18.
- 6.1.6 The proposal will maintain and enhance amenity values (Section 7(c)) through the provision of significant areas of open space, wetlands, stormwater management areas, and active transport and recreational connections. As noted by Mr. Hattam, Hendersons Basin and other stormwater management assets throughout Christchurch provide high-amenity open spaces for local residents and the wider city, and he considers that the proposal would deliver similar amenity outcomes. Mr. Hattam also notes that the higher-density residential areas have been focused around the proposed stormwater management areas. He considers that this arrangement will provide residents with direct access to high-quality open spaces and amenity features, contributing to a high standard of residential amenity. Evidence by Mr. Hattam states that the proposed stormwater basins and wetlands are anticipated to provide both functional and recreational benefits, while also creating opportunities for ecological enhancement and the establishment of a distinctive sense of place. The proposal will further enhance amenity values through the provision of additional wetlands, recreational areas, walking and cycling connections, and recreational routes.

- 6.1.7 In relation to section 7(b) of the RMA, which requires particular regard to be had to the efficient use and development of natural and physical resources, I consider the proposal represents an efficient use of land. The proposal area is located on the edge of the existing urban area and in proximity to Christchurch's established residential neighbourhoods, transport networks, services, and employment opportunities. Rezoning the land for residential development will provide additional housing capacity in a location that can integrate with the existing urban environment and make efficient use of existing and planned infrastructure.
- 6.1.8 Section 7(g) requires particular regard to be had to the finite characteristics of natural and physical resources. In this case, the proposal area is identified as highly productive land, which is a finite resource and an important consideration in assessing the proposal. The NPS-HPL report by the Agribusiness Group indicates that the proposal area is subject to a number of constraints that limit its productive agricultural potential. As a result, I consider the opportunity cost associated with the loss of productive land is reduced when compared with land that is capable of sustaining more intensive or economically viable agricultural production. Having regard to these matters, I consider that the proposal appropriately recognises the finite nature of land resources while enabling a more efficient use of this proposal area through the provision of residential development in a location that contributes to Christchurch's urban growth and housing needs. Accordingly, I consider the proposal is consistent with sections 7(b) and 7(g) of the RMA.
- 6.1.9 I consider that Te Tiriti o Waitangi has been "taken into account" in determining the appropriateness of the amendments to the CDP proposed by PPC18 (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:
- Achieve integrated management of the effects of the use, development and protection of land and associated natural and physical resources; and
 - Control and actual or potential effects on the use, development, or protection of land.
- 6.2.2 It is noted that PCC18 does not propose to change the objectives or provisions of RNN or RuUF, rather the purpose of the request is to change zoning of an area. It is my view that PCC18 as proposed, in combination with RNN and RuUF zoning and related provisions, would be able to achieve integrated management to the extent that potential adverse effects of use, development and protection of the land could be achieved. I consider that in regard to functions of territorial authorities; the proposed plan change is appropriate.

6.3 STATUTORY INSTRUMENTS

6.3.1 The CDP as amended by PPC18 must:

- *“Give effect”* to any national policy statement (section 75 (3)(a)), any regional policy statement (section 75 (3)(c)), national planning standard and any New Zealand coastal policy statement.
- *“Have regard”* to any management plan or strategy prepared under other Acts (section 74 (2)(b)(i)).
- *“Take into account”* any relevant planning document recognized 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)).
- *“Not be inconsistent”* with any regional plan (section 75 (4)(b)).

6.3.2 Table 7 below provides a summary of my opinions on the suite of national policy statements.

Table 7 Summary of National Policy Statements

National Statement	Policy	Key Criteria	Assessment
National Statement on Urban Development (NPS-UD)	Policy	Policy 1 Policy 8	The additional residential housing capacity enabled by PCC18 to be significant development capacity. The proposal will contribute to a “well-functioning urban environment”.
National Statement for Highly Productive Land (NPS-HPL)	Policy	Policy 5 Clause 1.3 Clause 3.6	The Rural Production or General Rural Zone to be nearest equivalent to the RuUF. PCC18 is required in order to provide sufficient greenfield development capacity. There are no other reasonably practicable and feasible options for providing at least sufficient development capacity within the same locality and market while achieving a well-functioning urban environment. The environmental, social, cultural and economic benefits of rezoning outweigh the environmental, social, cultural and economic costs associated with the loss of highly productive land for land-based primary production.
National Statement on Natural Hazards (NPS-NH)	Policy	Objective 1 Policy 1 Policy 2 Policy 3 Policy 6	Flood risk is considered to be medium level of risk. Geotechnical risk is not significant and can be appropriately managed.

National Policy Statement for Infrastructure (NPS-I)	Policy 3	The proposal will not comprise any strategically significant infrastructure. The proposed amendments to the ODP narrative ensure appropriate infrastructure provision.
National Policy Statement on Freshwater Management (NPS-FWM)	Objective 1	Any discharges or water-related effects fall within the jurisdiction of the regional council. These matters will therefore be assessed by the regional council in due course.
National Policy Statement for Indigenous Biodiversity (NPS-IB)	Objective 1	The proposal area is not known to contain significant indigenous biodiversity values and does not contain any Sites of Ecological Significance mapped in the Christchurch District Plan.

6.3.3 The extent to which PPC18 satisfies these statutory tests in the context of changes to the CDP are evaluated further below.

National Policy Statement on Urban Development (NPS-UD)

6.3.4 The NPS-UD is the preeminent national planning direction when it comes to urban environments in New Zealand. Summarising the direction of the NPS-UD, the planning document encourages greater density in urban centres and where appropriate greenfield expansion of urban environments. The NPS-UD also requires territorial authorities to provide sufficient development capacity for the short, medium and long term.

6.3.5 Relevant to PPC18, the NPS-UD through Policy 8 responsiveness policy enables greenfield expansion in urban environments where the development capacity proposed is considered 'significant' development capacity. Prior to considering the significance of the development capacity enabled by the request it is relevant to consider whether the request is spatially located within an urban environment and thus the NPS-UD is applicable.

6.3.6 An urban environment is defined in the NPS UD as any area of land that:

- a. is or is intended to be predominately urban in character; and
- b. is, or is intended to be, part of a housing and labour market of at least 10,000 people.

6.3.7 Considering the first limb of the definition, the proposal area is intended to be predominantly urban in character, by virtue of there being a plan change lodged for the proposal area that proposes RNN zoning. The CDP describes the RNN zone as including "new areas of greenfield land

where large-scale residential development is planned”. As such, I consider the zone is intended to be predominantly urban in character and therefore satisfies clause (a) of the definition. It is my view that it is appropriate to have regard to the intent of the lodged plan change in assessing whether the proposal area is intended to be urban in character. In my opinion to limit ‘urban environments’ solely to operative district plan zoning or formally identified growth areas would undermine the applicability of Policy 8 and the suite of Objectives and Policies included in the NPS UD.

- 6.3.8 Christchurch City has a population exceeding 400,000 residents, I consider the request area to be part of a housing and labour market of at least 10,000 people.
- 6.3.9 Overall, I consider the request area is located within an urban environment. I now turn to the tests of NPS-UD Policy 8.
- 6.3.10 The Policy 8 responsiveness policy has two limbs to it, the first limb being whether the development capacity is significant development capacity. The second limb is whether the development capacity would contribute to a well-functioning urban environment.
- 6.3.11 Turning to the first limb of whether the development capacity would be significant or not, Council’s latest Housing Capacity Assessment estimated that there is feasible capacity for 7,600 dwellings in the remaining greenfield capacity. Greenfield dwellings have historically been up taken at a rate of approximately 800 - 1000 dwellings per year. As such, the district will likely experience a shortfall in greenfield capacity within the next 10 years, resulting in a medium-term shortfall. Council must provide at least sufficient development capacity over the medium term to meet its obligations of Policy 2 of the NPS-UD. In the context of this scenario, I consider the additional residential housing capacity enabled by PCC18 to be significant development capacity.
- 6.3.12 Southwest Christchurch has long been identified as an area intended to accommodate future urban growth, and this broader planning context is an important consideration when assessing the proposal. As outlined in Section 3.3.2 of this report, the proposal area's inclusion within the wider urban growth area has been recognised through successive planning processes over an extended period. Historical documentation indicates that the original Residential New Neighbourhood (RNN) zone boundary was largely influenced by the extent of the flood ponding basin as understood through the flood modelling available at the time. Since the establishment of that zoning framework, further and more detailed technical assessment of the flood management function of the basin has been undertaken. This work has included consideration of compensatory storage solutions, which provide an alternative means of maintaining flood storage capacity while enabling development to occur on parts of the proposal area. The additional information now available has enabled a reassessment of the extent of land required for flood management purposes and, consequently, the appropriateness of the current zoning boundary.

- 6.3.13 Compensatory storage approaches have been appropriately implemented elsewhere within South-west Christchurch and are a recognised method for managing flood storage requirements while facilitating urban development. In that respect, the proposal does not represent the introduction of urban development into a previously unplanned location. Rather, it involves reconsideration of the precise extent and configuration of urban zoning within an area that has long been anticipated for future urban expansion. In my view, this distinction is important. While the proposal seeks to extend the RNN zoning beyond its current boundary, it does so within a broader area that has historically been identified for urban growth. The proposal is therefore more accurately characterised as a refinement of an existing urban growth framework, enabled by improved technical understanding of the proposal area's flood management requirements, rather than the rezoning of land that has not previously been considered for urban development.

Well-functioning Urban Environment Test

- 6.3.14 The second limb of the responsiveness policy is whether the proposal will contribute to a well-functioning urban environment, Policy 1 of the NPS-UD describes the minimum characteristics that a well-functioning urban environment exhibits. Those characteristics being:
- 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 proposal area 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 and future effects of climate change*
- 6.3.15 The proposal will contribute to meeting the needs of different households in terms of type, price, and location by providing greenfield housing. Greenfield developments typically deliver free simple allotments with standalone dwellings, which remain a sought-after housing typology. While the proposal primarily provides this form, the proponent has indicated that higher-density housing options may also be incorporated. As discussed previously, Mr. Yeoman states there is demonstrable demand for greenfield housing within Christchurch City. This demand sits alongside opportunities for Medium and High-Density development typologies enabled across the city through Plan Change 14. In this context, the proposal represents one component of a wider

housing supply that, collectively, provides for a diverse range of household needs. Accordingly, the proposal contributes to meeting the needs of different households by adding a housing type that is in demand, within Christchurch City.

- 6.3.16 The Mahaanui Iwi Management Plan seeks urban development outcomes that recognise and provide for the relationship of Ngāi Tahu and their culture and traditions with ancestral lands, waterbodies, and sites of significance. This includes recognising Te Tiriti o Waitangi, providing for sites and places of importance to tāngata whenua, recognising specific cultural values associated with places, ensuring development outcomes reflect Ngāi Tahu values and aspirations, and supporting traditional marae-based communities to maintain their relationship with ancestral land. Correspondence received from Mahaanui Kurataiao confirms that the kaitiaki representatives of Te Ngāi Tūāhuriri and Te Taumutu Rūnanga have reviewed the proposal and do not oppose the plan change required to enable development of the proposal area. This position is limited to the proposal area and does not extend to future zoning decisions elsewhere within the district. The rūnanga have indicated that they wish to remain involved through subsequent resource consent processes, particularly in relation to indigenous vegetation, stormwater management, and environmental effects.
- 6.3.17 I also note that the Mahaanui Iwi Management Plan does not identify any specific cultural values, wāhi tapu, or other sites of significance associated with the Hendersons Basin proposal area, nor does it identify any particular values associated with highly productive land in this location. In my view, the proposal is not inconsistent with the objective of enabling Māori to express their cultural traditions and norms. The engagement undertaken with Te Ngāi Tūāhuriri and Te Taumutu Rūnanga demonstrates that opportunities have been provided for Māori interests to be considered in the development of the proposal. Furthermore, there is nothing within the proposed zoning framework that would prevent Māori from establishing homes, communities, or living arrangements that reflect their cultural traditions and norms, subject to the RNN District Plan provisions that apply to all future residents. On that basis, I am satisfied that the proposal is consistent with this aspect of a well-functioning urban environment.
- 6.3.18 The proposal area is considered to provide good accessibility for people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport. The proposal area is located within Christchurch City and is within approximately 4km of the Central City, enabling access to employment, services, and amenities. It is also in proximity to existing natural spaces and open space, including the Port Hills, Te Kuru and Sparks wetlands, and the Heathcote River.
- 6.3.19 The proposal area is well-served by existing active and public transport connections, which supports a range of travel choices beyond private vehicles. This level of accessibility, combined with the proposal area's proximity to the Central City, also supports clause (e) by supporting

reducing greenhouse gas emissions through shorter travel distances and increased opportunities for walking, cycling, and public transport use.

- 6.3.20 The stormwater and flooding effects have been considered by Mr. Norton and are considered appropriate.
- 6.3.21 Overall, I consider that the proposal will contribute to a “*well-functioning urban environment*”, meeting the requirements of Policy 1 (a) to (f).
- 6.3.22 Overall, it is my view that the request gives effect to the Objectives and Policies of NPS UD. Of particular to this private plan change, it is my opinion that the request and is consistent with Policy 8 that requires Council to be responsive to the request where the development capacity is significant and contributes to a well-functioning urban environment.

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

- 6.3.23 The objective of the NPS HPL is the protection of highly productive land for use in land-based primary production, The sole objective is supported by policies that outline how HPL is an finite resource that needs to be managed in an integrated way (Policy 2). The “urban rezoning” of highly productive land (Policy 5) and subdivision (Policy 7) are to be avoided except as provided in the NPS-HPL.
- 6.3.24 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 PPC18.

Does PCC18 include highly productive land?

- 6.3.25 The proposal area contains LUC Class 2 soils. Clause 3.5 of the NPS-HPL outlines that, where a regional policy statement identifying highly productive land has not yet been made operative, territorial authorities must apply the NPS-HPL to land zoned General Rural or Rural Production that contains LUC Class 1–3 soils. The proposal area is zoned by the CDP as a mixture of RuUF and RNN. At the bottom of Clause 1.3 Implementation of the NPS-HPL directs that where local authorities have not yet implemented the Zone Framework Standard of the National Planning Standards, the nearest equivalent zones must be used.
- 6.3.26 Considering the nearest equivalent zone to RuUF requires an evaluation of the content of the CDP, rather than an evaluation of the land use on the proposal area and wider zone, refer to Appendix 13 for case law and Council’s legal opinion on this matter.

6.3.27 Turning to the CDP, Chapter 17 is constructed in a way that features one objective across seven rural zones. Objective 17.2.1.1 notes that subdivision, use and development of rural shall:

- Support, maintain and, where appropriate, enhance the function, character and amenity values of the rural environment and, in particular, the potential contribution of rural productive activities to the economy and wellbeing of the Christchurch District;
- avoids significant, and remedies or mitigates other reverse sensitivity effects on rural productive activities and natural hazard mitigation works;
- maintains a contrast to the urban environment; and
- maintains and enhances the distinctive character and amenity values of Banks Peninsula and the Port Hills, including indigenous biodiversity, Ngāi Tahu cultural values, open space, natural features and landscapes, and coastal environment values.

6.3.28 It is my view that a fair summary of the objective would be to support landscape and economic use of the rural environment along with maintaining a contrast to the urban environment.

6.3.29 Of the policies of Chapter 17 only 17.2.24 establishes a baseline of anticipated land use outcomes in the CDP's individual rural zones. In regard to RuUF the closest mention to a land use outcome can be derived from 17.2.2.24(a)(ii) that outlines to ensure the nature, scale and intensity of subdivision, use and development recognises the rural productive activities and recreation activities in the rural flat land area surrounding the main Christchurch urban area.

6.3.30 I consider Policy 17.2.2.7 is also relevant in that it outlines the anticipated density and distribution of residential units in rural zones. The policy is directive in that the density and distribution of residential units shall maintain and enhance the working function of the rural environment, and to avoid the expectation of land use change from rural to urban activities or rural residential development. Subdivision is worth consideration as the individual rural zones have different subdivision minimum lot sizes; it is my view that this is an appropriate response to the different land uses and landscape values across Christchurch's rural environment. The RuUF has a minimum lot size of 4ha, meanwhile the Port Hills Rural Zone has a minimum of 100ha. The land use provisions across the rural zones are near identical with individual differences in the Quarry, and Templeton zones reflecting the niche land uses anticipated.

6.3.31 Overall, I would summarise that the objectives, policies, and rules of Chapter 17 anticipates a productive environment for pastoral, agricultural, and quarry land uses with associated landscape values of openness and a stark contrast to urban.

6.3.32 Turning to the zone descriptions of the national planning standards, I consider Rural Production, General Rural and Rural Lifestyle the only appropriate options to be nearest equivalent to the RuUF.

- 6.3.33 The General Rural Zone is described as: *“Areas used predominantly for primary production activities, including intensive indoor primary production. The zone may also be used for a range of activities that support primary production activities, including associated rural industry, and other activities that require a rural location”.*
- 6.3.34 The Rural Production Zone is described as *“Areas used predominantly for primary production activities that rely on the productive nature of the land and intensive indoor primary production. The may also be used for a range of activities that support primary production, including associated rural industry, and other activities that require a rural location.”*
- 6.3.35 The Rural Lifestyle Zone is described as: *“Areas used predominantly for a residential lifestyle within a rural environment on lots smaller than those of the General Rural and Rural Production Zones, while still enabling primary production to occur.”*
- 6.3.36 Evaluating the three descriptions against my summation of the CDP RuUF that prioritises productive rural land uses I consider the Rural Production or General Rural Zone to be nearest equivalent to the RuUF.

NPS – HPL Rezoning of Highly Productive Land - Clause 3.6

- 6.3.37 NPS-HPL clause 3.6 requires that Tier 1 and 2 territorial authorities may 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.
- 6.3.38 As set out in the NPS-UD evaluation above, PCC18 is required in order to provide sufficient greenfield development capacity, as a shortfall of greenfield capacity is anticipated within the next 10 years.
- 6.3.39 The evidence provided by Mr. Yeoman concludes that there are no other reasonably practicable and feasible options for providing at least sufficient development capacity within the same locality and market while achieving a well-functioning urban environment.
- 6.3.40 The evidence provided by The Agribusiness Group concludes that the economic benefits of the proposed rezoning outweigh the long-term economic costs. The Agribusiness Group report provided as part of the section 32 evaluation estimates that the long-term net profit from farming the land would be approximately \$393,674 if operated as a single unit, or \$160,819 if operated as 10 individual units. On an annualised basis, this equates to approximately \$13,122 per year (assuming a single operation). In this context, the economic return associated with retaining the land for highly productive use is relatively limited and would be unlikely to support a financially sustainable farming operation. Having regard to this, I consider that the economic benefits

associated with rezoning the land outweigh the economic costs in terms of the loss of highly productive land, consistent with clause 3.6 of the NPS-HPL.

- 6.3.41 The Agribusiness Group report provided as part of the section 32 evaluation addresses social costs, noting that: “There will be a slight reduction in food production caused by the 25 ha being developed from rural to urban. This will be insignificant given the scale and constraints the proposal area is faced by.” Objective 17.2.1.1 of the Christchurch District Plan recognises that rural productive activities have the potential to contribute to the wellbeing of the Christchurch District. This establishes an expectation that rural land can contribute to overall wellbeing; however, that is in circumstances where the land is economically productive. Thus, the CDP is relatively silent on the social benefits of rural land where that land is fragmented and not economically viable as a farming unit. While the assessment within the section 32 evaluation is relatively brief, this is not considered to be a significant deficiency. The Christchurch District Plan does not identify a significant social benefit to the retention of rural land in circumstances where that land is fragmented and not economically viable for productive use. Accordingly, while the rezoning of highly productive land may result in some loss of rural productive capacity, any associated social costs are considered to be minor and are not significant in the context of the proposed rezoning.
- 6.3.42 The Agribusiness Group report identifies positive social benefits arising from the rezoning and development of the proposal area. In particular, it considers that the development will enhance residents' sense of belonging and place through the transition from rural to residential use, providing housing for multiple households and creating opportunities for social interaction. The report notes that the inclusion of walking and cycling connections throughout the development will facilitate community engagement and encourage residents to connect with one another. It also concludes that the development will strengthen the social fabric of both the proposal area and the wider Christchurch district by accommodating additional population growth and contributing to the provision of housing.
- 6.3.43 Overall, the social benefits associated with the proposed rezoning are considered to outweigh the social costs. While there will be a minor and permanent reduction in rural productive capacity, the evidence indicates that the proposal area's contribution to food production is limited due to its fragmentation and lack of economic viability as a farming unit. In contrast, the rezoning will deliver tangible social benefits through the provision of additional housing, the creation of a connected and accessible neighbourhood, and opportunities for community interaction and social cohesion. The development will support population growth and contribute to the wellbeing of current and future residents, while any social costs associated with the loss of rural land are expected to be minor. Accordingly, the overall social effects of the proposed rezoning are considered to be positive.
- 6.3.44 In relation to cultural effects, the Agribusiness Group report provided as part of the s32 evaluation states “As far as we are aware there are no cultural heritage sites on or near the proposal area

therefore this category is judged as having no impact on either of the considerations.” I refer to the Mahaanui Iwi Management Plan and the proponent’s correspondence with Mahaanui Kurataiao, which indicates that the Kaitiaki of Te Ngāi Tūāhuriri and Te Taumutu Rūnanga have reviewed the proposal and do not oppose the plan change required to enable development at this specific proposal area. This position is expressly limited to the proposal area and does not extend to wider District Plan zoning changes. The rūnanga have also indicated that they anticipate ongoing engagement through the resource consent process, at which point they will provide recommendations relating to indigenous vegetation, stormwater management, and environmental effects. In addition, the Mahaanui Iwi Management Plan does not identify specific cultural values associated with highly productive land or the Hendersons Basin area. Taking into account the absence of identified cultural values in relevant planning documents, together with the rūnanga’s position of non-opposition to the proposal, it is considered that the loss of highly productive land as a result of PCC18 is unlikely to give rise to a cultural cost.

- 6.3.45 In regard to environmental costs and benefits, the Agribusiness Group report provided as part of the s32 evaluation considers that the rezoning of the subject land would result in the permanent loss of approximately 25 hectares of Highly Productive Land, predominantly comprising LUC 2 and LUC 3 soils. However, while the land contains soils that are theoretically capable of supporting a range of productive land uses, its productive potential is significantly constrained by the inability to obtain irrigation water, poor drainage characteristics, reverse sensitivity effects arising from the surrounding urban environment, and its limited suitability for integration into larger-scale farming operations. The principal environmental cost of rezoning is therefore the loss of a finite soil resource and the reduction in future opportunities for land-based primary production. Additional environmental costs include the removal of existing rural open space character, the potential loss of shelterbelts that currently provide some carbon sequestration and habitat values, and a modest increase in urban-related effects such as vehicle emissions, impervious surfaces, and human activity. I consider that the environmental benefits of rezoning outweigh the environmental costs associated with the loss of Highly Productive Land on this proposal area.
- 6.3.46 Overall, the request satisfies the criteria outlined in 3.6(1) and in this circumstance, the urban rezoning of highly productive land may be allowed.

National Policy Statement on Natural Hazards (NPS-NH)

- 6.3.47 The NPS-NH came into effect in January 2026. It requires decision-makers to assess and manage natural hazards in a consistent, risk-based and proportionate manner. The NPS-NH applies to flooding and liquefaction hazard risks, in the context of the proposal area.
- 6.3.48 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.”*

- 6.3.49 The NPS-NH requires that the consideration of the natural hazard risks associated with the use or development of the proposal area 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 proportion 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 clauses 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).
- 6.3.50 The proposal area is subject to the Flood Management Area, Flood Ponding Management Area, and High Flood Hazard Management Area in the CDP. Evidence from Mr. Norton states that the minimum land levels for new development shall be based on the 1 in 200 year “max of max” flood prediction, which has an annual exceedance probability of 0.5%. Using Table 1 of the NPS-NH, an event with a 0.5% annual exceedance probability is considered “unlikely” A 1 in 200-year flood within Hendersons Basin, using Table 2 within the NPS-NH, would likely have “moderate” consequences, being some damage to land and non-structural damage to building, resulting in a limited loss of use and repairs being required. In regard to potential injuries or fatalities from such event, the area would be expected to be unsafe for people, with the potential for injuries, though these are expected to be minor. Using the Risk Matrix within Figure 1, with the likelihood level being unlikely and the consequence level being moderate, the natural hazard risk is considered to be Medium.
- 6.3.51 In relation to liquefaction, the proposal proposal area is located within the Liquefaction Management Area (LMA), which is based on a district-wide assessment identifying areas where damaging liquefaction is more likely to occur. The District Plan does not assign an annual exceedance probability (AEP) to liquefaction hazard, and therefore the risk cannot be directly assessed against the Risk Matrix. However, geotechnical evidence provided by Mr. Charters states 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.”*
- 6.3.52 This indicates that while liquefaction hazard is present, the level of risk is not significantly greater than that experienced across much of Christchurch. Furthermore, Policy 2 of the NPS–NH requires natural hazard risk associated with subdivision, use and development to be managed using an approach that is proportionate to the level of risk. In this case, the evidence demonstrates that the liquefaction hazard can be appropriately managed through standard geotechnical and engineering mitigation measures. Accordingly, the proposal is considered consistent with the objectives and policies of the NPS–NH.

National Policy Statement for Infrastructure (NPS-I)

- 6.3.53 The NPS-I came into effect January 2026. It recognizes 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).
- 6.3.54 Consideration must be given to spatial plans (Policy 3). Decision makes 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 (Policy 10 and 11) also need to be considered and addressed.
- 6.3.55 I do not consider that approving PPC18 would compromise any strategically significant infrastructure identified in the GCSP as the infrastructure required to service the proposal area is localised network upgrades and extensions and on-proposal area facilities (Policy 3). The proposed amendments to the ODP relating to infrastructure provision will ensure that, if approved, the development is supported by adequate water and wastewater infrastructure. Subject to these amendments, the proposal is considered to provide for the efficient and coordinated delivery of infrastructure and is therefore consistent with the objectives and policies of the NPS-I.
- 6.3.56 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.
- 6.3.57 As such, I consider that PCC18 is consistent with the NPS-I.

National Policy Statement on Freshwater Management (NPS-FWM)

- 6.3.58 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 their current and future wellbeing (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).
- 6.3.59 Any discharges or water-related effects fall within the jurisdiction of the regional council under section 70 of the RMA. These matters will therefore be assessed by the regional council in due course. On this basis, I consider the proposal to be consistent with the National Policy Statement for Freshwater Management.

National Policy Statement for Indigenous Biodiversity (NPS-IB)

- 6.3.60 The NPS-IB recognises the importance of maintaining indigenous biodiversity and the significant role it plays in supporting ecological integrity, as well as social, economic, and cultural wellbeing (Objective 1). It requires local authorities to identify and protect significant indigenous vegetation and significant habitats of indigenous fauna (Objective 2), and to maintain indigenous biodiversity across New Zealand (Objective 3). Decision-makers must avoid adverse effects on significant biodiversity and manage other adverse effects to ensure overall maintenance of indigenous biodiversity (Policies 3–5). The NPS-IB also requires the restoration and enhancement of indigenous biodiversity where practicable (Policy 6), and the consideration of the effects of activities and land use change on biodiversity values (Policy 8).
- 6.3.61 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 relevant to the consideration of PPC18. The proposal area is not known to contain significant indigenous biodiversity values and does not contain any Sites of Ecological Significance mapped in the Christchurch District Plan. As the proposal is unlikely to adversely affect indigenous biodiversity values, it is considered to give effect to the NPS-IB.

National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (NES-CS)

- 6.3.62 As this is a request for a zone change, and not to determine the actual use of the proposal area, 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 NES-CS.
- 6.3.63 As identified above, I consider that any risk of developing the land for residential purposes to people's health can be effectively managed under the NES-CS.

Canterbury Regional Policy Statement (CRPS)

- 6.3.64 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. Chapter 6 is most relevant for considering PPC18's consistency with the CRPS.
- 6.3.65 Throughout this report I have considered whether the request represents a well functioning urban environment, a development that can mitigate of natural hazards, and a development that results in an integrated outcome. Overall, I consider that PPC18 is generally consistent with the CRPS by virtue of being consistent with higher order national policy statements.

6.4 STRATEGIES AND PLANS

Greater Christchurch Spatial Plan (GSCP)

- 6.4.1 The GSCP 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 Future Development Strategy (FDS) for Ōtautahi Christchurch, and the Selwyn and Waimakariri districts under the NPS-UD.
- 6.4.2 Overall, I consider the request has regard to the GSCP by enabling additional housing choice, supporting housing affordability, and establishing a quality residential environment in a well-located area.

Canterbury Regional Land Transport Strategy 2024-2034 (CRLTS)

- 6.4.3 The following policies of the CRLTS are relevant to the proposal:
- Ensure safer streets and well-functioning urban areas that reduce the number and distance of trips that people need to make.
 - Develop solutions to ensure accessibility of essential services by active transport and micro-mobility (walking and cycling)
 - Improve the safety of vulnerable transport users, in particular cyclists and pedestrians.
 - Avoid investment that has poor alignment with spatial planning and creates urban sprawl.
- 6.4.4 The proposal is considered to align with the relevant policies of the Canterbury Regional Land Transport Strategy (CRLTS). The proposal is considered to provide a well-functioning urban environment. The proposal promotes active transport through the provision of dedicated walking and cycling connections. Some of these connections, like the proposal recreation route, are separated from the road network, enhancing the safety and amenity of pedestrians and cyclists and encouraging greater uptake of active travel modes.
- 6.4.5 In addition, the proposal area is located adjacent to an existing residential area within an established neighbourhood and is well connected to surrounding services and community infrastructure. As a result, the proposal represents a logical expansion of the urban area and does not give rise to urban sprawl or an inefficient pattern of development. Instead, it supports a more consolidated urban form that enables residents to access nearby amenities, employment opportunities, and transport networks. Accordingly, I consider the proposal to be consistent with the relevant objectives and policies of the CRLTS.

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.

6.4.7 Correspondence received from Mahaanui Kurataiao confirms that the kaitiaki representatives of Te Ngāi Tūāhuriri and Te Taumutu Rūnanga have reviewed the proposal and do not oppose the plan change required to enable development of the proposal area. This position is limited to the proposal area and does not extend to future zoning decisions elsewhere within the district. The rūnanga have indicated that they wish to remain involved through subsequent resource consent processes, particularly in relation to indigenous vegetation, stormwater management, and environmental effects.

6.4.8 Consequently, I consider that PPC18 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, which would be compromised by the granting of the request.

Christchurch District Plan (CDP)

6.4.9 The relevant CDP provisions need to be considered when determining the appropriateness of PCC18 and evaluating the relief sought in submissions. PCC18 involves an extension of the existing RNN zoning and does not introduce any new district plan provisions. Accordingly, the assessment against the CDP focuses on whether this extension of the RNN zoning is consistent with the established district plan framework.

6.4.10 The RNN provisions are settled, which indicates that the proposed amendments will align with Chapter 3 Strategic Directions, as well as the associated objectives and policies. The remaining provisions to be considered are the objectives and policies of Chapter 14 – Residential.

6.4.11 Objective 14.2.1 and its associated policy seek to increase housing supply by enabling a range of housing types, sizes, and densities that meet diverse community needs and improve affordability, while directing residential development to existing urban areas and identified greenfield priority areas, and ensuring a mix of densities in greenfield locations achieving at least 15 households per hectare.

6.4.12 PCC18 gives effect to Objective 14.2.1 and its associated policy 14.2.1.1 in part. The proposal provides for greenfield residential development and will achieve a minimum density of at least 15 households per hectare, consistent with the policy’s expectations for greenfield areas. While the predominant dwelling typology is anticipated to be single standalone dwellings, the proponent has indicated that areas of higher density will be incorporated where appropriate, contributing to a broader range of housing types and densities. However, the proposal does not fully align with the policy, as the subject proposal area is not located within existing urban areas or identified greenfield priority areas in Map A of the CRPS. Notwithstanding this, the assessment under Policy 8 of the NPS-UD concludes that the development would contribute to a well-functioning urban environment.

- 6.4.13 Objective 14.2.4 and its associated policies seek to provide high quality residential environments that are well-designed, liveable, and sustainable, by ensuring that development responds positively to its surrounding context, contributes to neighbourhood character and amenity, supports safe and efficient movement, and reflects Ngāi Tahu heritage. I consider that PPC18 is consistent with Objective 14.2.4 and its associated policies. The proposal responds positively to the proposal area's physical and environmental context through the integration of stormwater management areas, open space, active transport connections, and the naturalisation of Stillwell's Drain. Mr. Hattam and Ms. Smith consider that the Residential New Neighbourhood (RNN) Zone is the most appropriate zoning framework for the proposal area and will provide an appropriate transition between existing residential areas, open spaces, stormwater management areas, and the surrounding Rural Urban Fringe land. The proposed combination of recreational routes, walking and cycling connections, and open space areas will contribute to a high-quality, liveable residential environment while supporting safe and efficient movement throughout the neighbourhood. The incorporation of natural and ecological features into the development will also assist in creating a distinctive sense of place and contribute positively to neighbourhood character and amenity.
- 6.4.14 The proposal has also been reviewed by the Kaitiaki of Te Ngāi Tūāhuriri and Te Taumutu Rūnanga, who do not oppose the plan change and have indicated a desire for ongoing involvement through future consenting processes, particularly in relation to indigenous vegetation, freshwater management, and environmental outcomes. In my view, this ongoing engagement, together with the environmental enhancement proposed throughout the proposal area, demonstrates that appropriate recognition has been given to Ngāi Tahu values and interests. Overall, I consider the proposal will deliver a well-designed, liveable, and sustainable residential environment and is therefore consistent with Objective 14.2.4 and its associated policies.
- 6.4.15 Objective 14.2.5 and its associated policies for the Residential New Neighbourhood Zone seek to enable the coordinated, efficient, and sustainable development of greenfield land through adherence to outline development plans and comprehensive master-planned development. I consider that PPC18 is strongly aligned with Objective 14.2.5 and its associated policies. The proposal extends the existing RNN Zone and replaces the Hendersons Basin Outline Development Plan with an amended ODP that establishes an integrated framework for future development. The ODP identifies the road network, active transport connections, stormwater management areas, recreational routes, and open space linkages, ensuring that development occurs in a coordinated and comprehensive manner rather than through fragmented or ad hoc subdivision. The proposal will also achieve the minimum density expectations of the RNN Zone, with approximately 300 dwellings anticipated at a minimum density of 15 households per hectare, representing an efficient use of urban land. The proposal is also supported by appropriate servicing and infrastructure, subject to the amendments recommended by Ms. McDonald to ensure that required water supply and wastewater upgrades are delivered alongside development. The proposed ODP will provide

for an integrated neighbourhood that is well connected internally and to adjoining residential areas, while also incorporating natural, cultural, and ecological values into the overall development pattern. Accordingly, I consider that the proposal reflects the comprehensive, master-planned approach anticipated by the RNN Zone and is consistent with Objective 14.2.5 and its associated policies.

7 SECTION 32 EVALUATION AND S32AA EVALUATION

7.1 EVALUATION SUMMARY

- 7.1.1 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.
- 7.1.2 In this case, PPC18 does not propose to add or alter any objectives or policies. I refer to the evaluation provided in the Section 32 report accompanying the notified plan change, which concludes that the new ODP and associated revised narrative, as notified, are appropriate, efficient and effective in achieving the relevant existing objectives.
- 7.1.3 Further evaluation under s32AA shows that the changes I have recommended to the Plan amendments proposed in Private Plan Change 18 do not significantly affect the conclusions of the original s32 evaluation.

8 CONCLUSIONS AND RECOMMENDATIONS

- 8.1.1 In summary, I am satisfied that Plan Change 18, with the amendments I am suggesting to the ODP narrative, will more appropriately achieve the District Plan objectives and better meet the purpose of the Act than the current Plan provisions.
- 8.1.2 I recommend therefore that:
- Plan Change 18 be approved with modifications as set out in the attached Appendix 2; and
 - Submissions on the Plan Change be accepted or rejected as set out in Appendix 3 of this report.

APPENDIX 1 – SECTION 32AA EVALUATIONS

APPENDIX 2 – DISTRICT PLAN TEXT AMENDMENTS WITH RECOMMENDED CHANGES

APPENDIX 3 – TABLE OF SUBMISSIONS WITH RECOMMENDATIONS

**APPENDIX 4 – REVIEW OF PPC18 AND SUBMISSIONS RELATED TO TRANSPORT MATTERS BY
LIQI CHEN, TRANSPORT NETWORK PLANNER – ASSET PLANNING - TRANSPORT (COUNCIL)**

**APPENDIX 5 – REVIEW OF PPC18 AND SUBMISSIONS RELATED TO STORMWATER MATTERS
BY BRIAN NORTON, SENIOR STORMWATER PLANNING ENGINEER - ASSET PLANNING –
STORMWATER & WATERWAYS (COUNCIL)**

**APPENDIX 6 – REVIEW OF PPC18 AND SUBMISSIONS RELATED TO GEOTECHNICAL MATTERS
BY NEIL CHARTERS, PRINCIPAL GEOTECHNICAL ENGINEER AT ENGEO (CONSULTANT FOR
COUNCIL)**

**APPENDIX 7 – REVIEW OF PPC18 AND SUBMISSIONS RELATED TO WASTEWATER AND
WATER SUPPLY MATTERS BY MICHELE MCDONALD, TEAM LEADER: ASSET PLANNING -
WATER AND WASTEWATER (COUNCIL)**

APPENDIX 8 - REVIEW OF PPC18 AND SUBMISSIONS RELATED TO PARKS MATTERS BY PETER BARNES, SENIOR PARKS AND POLICY PLANNER - PLANNING AND POLICY (COUNCIL)

**APPENDIX 9 - REVIEW OF PPC18 AND SUBMISSIONS RELATED TO URBAN DESIGN MATTERS
BY DAVID HATTAM, SENIOR URBAN DESIGNER – URBAN DESIGN (COUNCIL)**

**APPENDIX 10 - REVIEW OF PPC18 AND SUBMISSIONS RELATED TO LANDSCAPING MATTERS
BY ABIGAIL SMITH, SENIOR LANDSCAPE ARCHITECT (COUNCIL)**

**APPENDIX 11 - REVIEW OF PPC18 RELATED TO ECOLOGY MATTERS BY ANDREW
CROSSLAND, ECOLOGIST (COUNCIL)**

APPENDIX 12 - RMA/2023/1256A SCHEME PLAN

APPENDIX 13 – CCC NPS-HPL LEGAL OPINON

