

10 December 2020
[Erratum 16 December 2020]

Rolleston Industrial Developments Limited
c/- Novo Group Limited
PO Box 365
CHRISTCHURCH 8140

Attention: Jeremy Phillips

Sent by email to: jeremy@novogroup.co.nz

Dear Jeremy,

PC200069: Private Plan Change Request to the Operative Selwyn District Plan from Rolleston Industrial Developments Limited in Lincoln – Request for further information

Thank you for your application lodged on behalf of Rolleston Industrial Developments Limited requesting a change to the Operative Selwyn District Plan. In accordance with Clause 23 of Schedule 1 of the Resource Management Act 1991, the following information is requested to enable Council to better evaluate the potential effects of the proposal, the ways in which adverse effects may be mitigated and the nature of consultation undertaken.

Scope of Plan Change Request

1. Please provide evidence that the owners of the following properties are party to, or supportive of, the request:
208 Collins Road (Lot 1 DP 55313) being a parcel of 1.7738 ha
1521 Springs Road (Lot 1 DP 20660) being a parcel of 6.1191 ha
1534 Springs Road (Lot 1 DP 494430) being a parcel of 0.6396 ha
2. If any, or all, of the above land owners do not wish to be party to the plan change, please provide the rationale for including these parcels in the plan change request.
3. It is also noted that 36 Collins Road (Lot 7 DP 68631), being a parcel of 4.4887 ha, has been excluded for the plan change request. The effect of this is that the site will retain its Rural (Outer Plains) zoning and be surrounded on three sides by land zoned Living, which is an outcome Policy B4.3.3 seeks to avoid as it can increase the potential for reverse sensitivity effects. Please provide the rationale for excluding this parcel from the plan change request and address the conflict with Policy B4.3.3 and advise how reverse sensitivity effects may be addressed.

Consultation with Rūnanga

4. It is noted that the plan change application has been provided to Mahaanui Kurataiao Limited for their comment. Please provide a copy of any feedback received.
5. The request also identifies that the applicant is *“mindful of the sensitive and culturally significant features on the plan change site such as natural waterways, springs and indigenous vegetation of*

value". The request also identifies that *"the provision of locally sourced indigenous vegetation within the plan change site as it develops is a matter that will be addressed at the time of subdivision and development and support cultural values associated with the site. It is expected that any subdivision consent for development of the zone can and will incorporate conditions of consent addressing these requirements.* This statement is not supported by the ODP text. Please identify if the existing framework within the Operative District Plan is sufficient to achieve the statement above.

Consultation

6. Please advise what, if any, consultation has been undertaken with the LII Drain committee.

Higher Order Documents

7. Please provide a thorough assessment of the plan change request against all the relevant provisions of the Canterbury Regional Policy Statement and the Canterbury Land and Water Regional Plan.
8. As acknowledged in the plan change request, the area is subject to inundation in a 200-year Average Recurrence Interval flood event, and that it may contain areas that fall within the Regional Policy Statement definition of 'high hazard'. Please ensure that the assessment requested above considers CRPS Policy 11.3.2 *Avoid development in an area subject to inundation*.
9. Please also provide an assessment of the plan change request against the *Our Space (201-2048): Greater Christchurch Settlement Pattern Update*, and the planning directions for supporting urban growth in Greater Christchurch.

Heritage and Culture

10. Throughout the text, and in the ODP, 'The Springs' O'Callaghan farmhouse ('Chudleigh') is identified as a heritage item. It is not identified as such within the Operative District Plan but the Proposed District Plan has identified both the house and its setting as a heritage item.
11. Please identify the size of the area to be zoned Living X around Chudleigh. Please consider and advise if there is an alternative way within the plan change request to acknowledge Chudleigh rather than spot zoning. Please also identify if any rules are required to ensure that the context and setting of Chudleigh are not compromised by the surrounding development as proposed e.g. setback and fencing provisions, restriction on further subdivision.
12. Please note that the Proposed District Plan identifies the Chudleigh as a heritage item (heritage building and its setting) and the relevant provisions have immediate effect.

National Policy Statement on Urban Development 2020 (NPS-UD)

13. This Plan Change is heavily reliant on the NPS-UD to address the conflict with the Regional Policy Statement, particularly CRPS Objectives 6.2.1 and 6.2.2.5, and their associated policies.
14. The requests relies on Policy 8 as it assets that it would add significantly to development capacity. Paragraphs 115-117 of the application discuss the theoretical existing capacity within Lincoln. However this assessment does not consider the percentage increase that the request will add to

both the existing township and the wider district over the short/medium/long term timeframes considered by the NPS-UD. Please consider this and amend the assessment accordingly. In this regard, please consider the targets set out in Objective B4.3.9 in the Operative District Plan, as well as Our Space. Please note that at its meeting on 9 December 2020, Council adopted an update its Housing and Business Development Capacity Assessment for the short, medium and long term. https://www.selwyn.govt.nz/_data/assets/pdf_file/0006/360735/PUBLIC-Agenda-Council-Meeting-9-December-2020.pdf pages 39-54

15. Please demonstrate how the plan change request achieves Objective 2 and Policy 1(d), particularly in terms of supporting competitive land and development markets, when all of the development capacity that may be required to meet expected demand for housing in Lincoln over the short, medium and long term is to be provided by the one developer.
16. Please provide a more thorough assessment of how the request supports an urban environment that supports the reduction in greenhouse gas emissions and is resilient to the current and future effects of climate change, as required by Objective 8 and Policies 1 and 6.
17. The assessment of the criteria in Policy 1 of the NPS-UD for 'well-functioning urban environments' provided with the request only considers this in relation to the plan change area. As noted in paragraph 132 of the request, the urban environment is considered to encompass all of Greater Christchurch. Therefore, please provide an assessment of how the request would contribute to the function of the wider urban environments of the Lincoln township, the surrounding district and the Greater Christchurch area.
18. At various points in the request, reference is made to providing for growth, both up and out, yet the request does not consolidate development closer to the town centre of Lincoln. Please provide an assessment of the building heights and densities proposed in the request relative to Policies 3(d) and 1(a). This assessment should demonstrate, in terms of the proposed densities, what the differences are on the ground between 12 and 15hh/ha and how the proposal provides for a variety of homes that meet the needs of different households, including all age groups.

Versatile Soils

19. The area of the plan change request contains Class 1, 2 and 4 soils. Policy B1.1.8 seeks to avoid rezoning land which contains versatile soils for new residential or business development if the land is appropriate for other activities; and there are other areas adjoining the township which are appropriate for new residential or business development which do not contain versatile soils. Please address this policy and provide an assessment against both tests contained within it.
20. Tables 3 and 4 in the assessment of efficiency and effectiveness identify that a cost/disadvantage of these options is the *"loss of low productivity rural land"*. As the majority of the plan change request area rests upon Class 1 and 2 soils, please qualify the statement that this land is *'of low productivity'*.

Operative District Plan

21. The plan change request seeks only to vary the Operative District Plan by incorporating the proposed ODP into Appendix, however it is considered that there are a number of rules that also need to be amended to reflect the intent of the request.

22. As the Living X zone is not mentioned in Rule C4.7.1/Table C4.1 Site Coverage Allowances, please provide a quantum to be included in this table. Similarly please consider if it is appropriate that any development in the Living X zone rely on the minimum setbacks for buildings set out in Table C4.2 or if a more specific building setback framework is established to address the intent of this zone.
23. The LI Creek and the LII River are identified in Appendix E12 Waterbodies, which sets out on which waterbodies Council wishes to establish esplanade reserves and strips. Having regard to s230 of the RMA, please consider if this table should be amended to include Spring Creek. Please also provide advice on the suitability of existing provisions in the Operative District Plan that address waterbodies.
24. Existing Rules C4.9.33 and C4.9.34 provided for a building setback of from the Business B2B zone to address reverse sensitivity effects of possible activities from this zone. Please consider if it is appropriate that a similar setback be required for that area of the plan change request adjacent the Business 2B zone.
25. The visual assessment acknowledges that the plan change *“would result in an overall change of character from open and rural to one that is more dense and suburban in nature”*. It goes on to state that *“management of fencing and bulk and location of the development will create a sense of openness throughout the site”* and that the change is *“partially mitigated through fencing controls and landscape planting”*. Mitigation measures are to be incorporated within the plan change, primarily through the ODP and the adoption/location of different zones. However, the ODP largely shows the Living Z zone immediately adjacent the boundary with the Rural (Outer Plains) boundary, and no mention is made of any provisions relating to fencing, either existing within the Operative District Plan or proposed. How does the plan change request proposed to address interface between the proposed Living and existing Rural zones? Further, how does the plan change request propose to manage reverse sensitivity effects with rural zoned land to west, south and east?
26. As acknowledged in the plan change request, part of the area may be subject to surface flooding. While the request indicates that the flooding hazard can be managed, please identify what measures may be necessary to protect the proposed residential development from flooding. Such measures may include the stipulation of minimum finished floor levels or established of building platforms. It is noted that the existing specific provisions (Rules C4.1.1 and C12.1.4.81) in the Operative District Plan are specific to Tai Tapu. Please consider and advise if it is considered necessary to amend these existing rules or to incorporate additional provisions into the plan to address the flooding hazard.
27. Please advise if the presence of the 33kV power lines along Collins Road and Springs Road is required to be addressed by the inclusion of specific rules within either C12 Subdivision or C4 Buildings.
28. The assessment of the request against the objectives and policies of the Operative District Plan is not considered to be complete. Please provide an assessment of the request against all of the relevant provisions of the Operative District Plan, including those identified within this letter, as well as Objective B3.4.3 and Policy B3.4.39; Objective B1.3.2 and Policies B1.3.1 and B1.3.3; and Policy B3.1.7.

Outline Development Plan (ODP)

29. Please provide an assessment of the ODP against all the matters set out in Policy B4.3.8, including:
 - Identifying any cultural (including Te Taumutu Rūnanga values), natural, and historic or heritage features and values and show how they are to be enhanced or maintained;
 - Indicating how required infrastructure will be provided and how it will be funded;
 - Demonstrating how effective provision is made for a range of transport options, including public transport systems, pedestrian walkways and cycleways, both within and adjoining the ODP area;
 - Showing how other potential adverse effects on and/or from nearby existing or designated strategic infrastructure (including requirements for designations, or planned infrastructure) will be avoided, remedied or appropriately mitigated;
 - Showing how other potential adverse effects on the environment, the protection and enhancement of surface and groundwater quality, are to be avoided, remedied or mitigated;
 - Including any other information which is relevant to an understanding of the development and its proposed zoning; and
 - Demonstrating that the design will minimise any reverse sensitivity effects.
30. The text accompanying the proposed ODP should make reference to how development of the area should acknowledge the cultural, natural and heritage features of the area, and how these may be incorporated into any design philosophy accompanying future development. It should also incorporate the urban design principles set out at paragraph 20 of the plan change request.
31. It is considered that the description and illustration of the proposed density associated with the Living Z and Living X zones shown on the ODP may create confusion with the Proposed District Plan. Please consider amending this.
32. The secondary connections north – to Verdecos Park and Te Whāriki have not been provided for within these subdivisions. Please advise of any discussions with the developers of these area as to the feasibility of roading connections between the area of the plan change and the consented developments to the north.
33. Please annotate the ODP (or supporting text) to include any measures appropriate to address reverse sensitivity matters between the Living and Rural zone, as well as between the Living Zones themselves.
34. Please identify by name the existing waterways within the plan change area.
35. To address CPTED issues, it is noted that any of the proposed reserve along the waterbodies should have extensive road frontages, rather than being behind houses.
36. Please consider if the ODP needs to address the presence of the 33kV power lines along Collins Road and Springs Road.
37. The ODP should also be amended to reflect any matters raised in the points in this letter, particularly regarding roading and reserves.
38. It is noted that through the Proposed District Plan process, Council is seeking to establish a consistent ODP design with an approach to minimise features on an ODP and utilise assessment

considerations in supporting text. While this is a request to change the Operative District Plan, please be aware that alignment of the ODP design may be sought as this request progress.

Infrastructure

Water

39. The Infrastructure Assessment provided with the application was reviewed by Council's Asset Manager – Water Services.
40. The Lincoln Sewage Treatment Plan, referred to in the request as the Allendale Pump Station, is located on the north-eastern boundary of the plan change area. This area is designated (SDC-153) and Rule C4.9.32 requires that any dwelling shall be setback not less than 150m from the boundary of the designed area. The plan change request has not sought to vary this rule, therefore please demonstrate how this will be achieved and address any other reserve sensitivity effects that may arise from the location of residential activity in close proximity to the designated area. This is particularly relevant as the request proposes that the ponds will be required to buffer wastewater flows from the plan change area during periods of wet weather.
41. Council's Asset Manager – Water Services has advised that the design of wastewater systems should ensure that all wastewater is directed/discharged directly to the Allendale Pump Station. The applicant is also advised that the Vernon Drive Water Treatment Plant has been designed for the existing predicted growth of Lincoln and therefore is considered to be at capacity. As such, a new water treatment plant site will be required as part of the request and provision should be shown within the ODP for this.
42. Council's current consent capacity to abstract water may limit the ability to service the development. Please advise if there are any resource consents for water abstraction within the plan change area and if these will be transferred to Council.
43. Please assess the downstream effect of stormwater on the capacity of the LII drainage network.

Reserves

44. The plan change request have been reviewed by Council's Manager – Open Space and Property.
45. The reserve placement distribution appears to be largely dictated by the location of spring heads. A more through assessment is requested on the importance of the springs, along with an indication of how these will be dealt with within the development and integrated into the reserve network. It also raises questions about how these areas will be developed – for drainage or recreational purposes?
46. The central reserve to the north does not take into account the proximity to the new large reserve (of approximately 8,400m² being developed on the southern boundary of Te Whāriki, immediate adjacent the area shown on the ODP. As such, while sufficient green space should be provided at the head of Springs Creek, a neighbourhood reserve in this location is not supported.
47. In removing the central reserve to the north, adjacent Te Whāriki, the central reserve to the south could be moved north a bit to provide the required distribution of 500m, unless the location of this reserve is dictated by the location of a spring.
48. Please advise of the purpose and rationale of the large reserve proposed in the south eastern portion of the area, adjacent the stormwater management area on the eastern boundary. It does

not appear to correlate with the provision of open space around an area of medium density residential development and it is assumed that its location may also be dictated by the location of a spring and/or the need to buffer the parcel to the south.

49. Council's Manager – Open Space and Property has advised that pedestrian linkages through to Moirs Lane and Jimmy Adams Terrace are desirable, and provision for these should be allowed for, within the reserve and roading networks.
50. In regards to the various esplanade reserves, Council's Manager – Open Space and Property has advised that Council will want to confirm the widths of such, particularly along the LII where the width of existing drainage reserve/LINZ land adjoins, but is not included within the PC area.
51. Please advise how the current boundary treatment along the southern boundary of the Te Whāriki development is to be incorporated into the plan change area.

Transport

52. The Integrated Transport Assessment provided with the application was reviewed by Council's Asset Manager – Transportation.
53. Council operates a Paramics Transport model for Lincoln which has been recently updated. The traffic assessment provided with the request does not appear to have utilised this model to consider the effects of the proposal on the existing Lincoln township and wider network. It is requested that the applicant liaise with Council to expand the model to incorporate this plan change area and this model is then used to inform the ITA for this request. Following this, Council will require any traffic modelling, results and analysis to be peer reviewed by Abley Consultants.
54. Council abandoned the concept of the Lincoln Southern Bypass due to the practical difficulties with poor soil conditions, high water tables and natural flowing (and culturally sensitive) springs within the area, combined with the refusal of the Lincoln University to allow any extension of Weedons Road through to at least Verdecos Park. The high cost compared to low use was also a predominate factor in Council's decision at the time not to proceed with the bypass. Therefore, please provide an assessment of how dependent the proposal is on a roading/bypass connection between Ellesmere Junction Road/Weedons Road and Springs Road to cater for this development? The applicant is advised that as Council has formally rejected perusing such a connection, the full responsibility to provide it if required would be on the applicant.
55. As raised above, there are no vehicle transport connections provided from the Verdecos Park and Te Whāriki subdivisions to the north of the plan change area, and the applicant is requested to consider the suitability of the roading layout if these connections cannot be secured. It is critical that the sufficient roading, pedestrian and other similar linkages are made to the adjoining Lincoln Township network for integration and permeability, yet there are no proposals on how this will be achieved in detail for ODP requirements.
56. Moirs Lane includes an important cycleway link for the Little River Rail Trail along it and beyond to River Road. How would this be catered for in an off road facility and road/intersection crossing points?
57. The existing Springs/Collins Road intersection is not suited for substantial increases in use. What are the proposals for this being upgraded?

58. Please clarify what status and form Collins Road is proposed to have. Please also advise if it is proposed that sites will have individual access off Collins Road.
59. As part of any localised network upgrade, along with Collins Rd being formed and sealed as would be expected, a bridge and new carriageway through to Ellesmere Road would also be an outcome required to cater for access to the southern development areas as opposed to just relying on one northern connection off Ellesmere Road. This is made more important, as it may eventuate with no other local roading connections north into the existing township roading network able to being made by the proposal, making this connection even more important to provide.
60. The ITA refers to no direct (lot) access to Springs Road. What is the rationale for this approach? Direct access has been supported for the existing subdivisions to the north, thereby facilitating urban frontage upgrades and speed limit changes to integrate the area into an urban form setting. As such it is an outcome that is desired for the plan change area.
61. Please advise how management of the existing stock underpass, which is shown as a pedestrian link, will address CPTED principles.
62. The applicant is requested to confirm that all the upgrades to existing roads (widening, sealing, intersections and urban frontage upgrades etc.) are at the developers cost in addition to all new roads and transport requirements related to the proposal. It is noted for example a more significant upgrade of the Gerald/Springs/Ellesmere Junction Road intersection is proposed in the ITA, yet this requires third party land from the likes of the Lincoln University and Ag Research that Council know will not be forthcoming. Please advise how the applicant will obtain all the necessary land and undertake the upgrades identified necessary different to the current plans in train.
63. Council is planning to fully upgrade Gerald St from east to west over the 10 years as part of an arterial road and town center upgrade for Lincoln. How does this development impact on those plans and details – bypass or otherwise with the increased or redirected traffic generated by the proposed development? The upgrade was agreed on the basis a bypass was not what Council wanted in comparison.
64. Council is planning to upgrade the Ellesmere Road arterial between Lincoln and the City with a coordinated widening and intersection safety upgrade programme. How does this development impact on those plans and details, considering the application identifies the upgrade of Ellesmere Rd south of Edward St (but needed to Collins Rd), but not north ?
65. Through the development of Te Whāriki, Council has experienced having to deal with numerous road construction issues experienced by that developer due to poor soils, high water tables that have created settlements of both roads and footpaths. The proposed development area extends further south into allegedly worse areas than in Te Whāriki with increased the risk of these issues being exacerbated. Council does not want roading assets vested in it that then lead to a continuation of problems it then has to bear the cost on for perpetuity. How will this risk be addressed by the applicant and what long term protections will be there for Council?

Geotechnical Assessment

66. The Geotechnical Assessment provided with the application was peer reviewed on behalf of Council by Ian McCahon of Geotech Consulting Limited and this is attached for your information.

67. It is requested that:
- [Coffey] research publicly available borehole information (ECan well data base and NZ Geotechnical Database) to verify the deeper profile which is only inferred as shear wave velocity profile in parts of the site, and increase the number of locations where ground conditions are known, particularly along the northern side, and thus enhance confidence in the overall geotechnical model.
 - comment on lateral spread as a potential hazard [is also provided].
68. It is also noted that the geotechnical assessment provided does not cover all of the plan change area – excluding 208 Collins Road, 1521 and 1543 Springs Road. While the reviewer has not made comment on this matter, please provide advice on the appropriateness of geotechnical land conditions of these parcels.

Preliminary Site Investigation (PSI) Report

69. The PSI report provided with the application was peer reviewed on behalf of Council by Environment Canterbury.
70. Given the size of the plan change area, it is considered that the PSI report is light on detail and makes too many assumptions without supporting evidence, given the potential number of houses that may be developed on the site over time. In particular, the PSI does not cover all of the plan change area – excluding 208 Collins Road, 1521 and 1543 Springs Road.
71. The map with the HAIL areas outlined did not include a landfill site in the southwestern corner of Lot 2 DP 494430 that is already flagged on the LLUR. Table 2 appeared to dismiss this as being a landfill and called it low risk because there was “*no visible presence of large earthmoving in historical aerial photographs*”. However, the aerial imagery clearly shows a reasonably large pit that was filled with unknown material, and while it may not have been a municipal landfill, there is potential for there to be contaminants present. The filling appears to have taken place in the 1960’s and 1970’s, when environmental considerations and regulations were very different to what they are now. The PSI should be updated to reflect that this is an area of concern that needs to be investigated.
72. Further, the assertion in Table 2 that the farm yard area is considered to be low risk for A10, or any other HAIL activities, especially without any testing is challenged. The yard has been present since at least the 1940’s, and could have accommodated a number of potential HAIL activities that may not be immediately clear from only a walk over, which only assesses the current state of the site without considering what may have occurred there in the past.
73. Asbestos was not flagged as a potential contaminant of concern despite the buildings being present at the site since the 1940’s, and it is recommended that this is considered as a contaminant of concern in respect of any DSI that may be undertaken at a later date.
74. The PSI report also notes that the borrow pit in the western part of the site had been remediated, however neither Environment Canterbury nor Council holds any reports that confirm this. Please provide evidence supporting this claim otherwise this area should also be investigated further. Note that land use consent (RC105097) was granted to undertake quarrying activities to extract a total volume of 35,000m³ of gravel.

75. It is also requested that the plan change area be shown on the historical aerial photographs included in Appendix A to the PSI report. It is also noted that there is a considerable gap in aerial photos between 1994 and 2017, despite imagery being publically available.
76. It is also requested that the location of the photographs included in Appendix B to the PSI report be shown on Figure 1: 1491 Springs Road – Site Plan.
77. Should the plan change request be approved, a Detailed Site Investigation (DSI) will be required over all the identified HAIL areas of the site. If the DSI identifies contamination that exceeds the soil contaminant standards for residential use, then a Remedial Action Plan will be required, remedial works will be required to be undertaken as per the plan, and a Site Validation Report will be required to be submitted to council confirming that the site is suitable for residential use.

Ecological Assessment

78. The Ecological Assessment provided with the application was peer reviewed on behalf of Council by Greg Burrell, Instream Consulting Limited and this is attached for your information.
79. It is requested that the following further matters be addressed:

Wetland identification, significance, and protection

80. There are numerous ponds and wetland areas across the plan change area. No assessment has been made of their ecological significance or how they would be protected or enhanced. This needs to be done because the proposed Outline Development Plan does not identify wetland values.

Location, state, and protection of springs

81. There are large springs at the headwaters and in the bed of Springs Creek, plus numerous springs are indicated across the plan change area on Environment Canterbury's GIS database. Springs have significant ecological and cultural value. Better identification of these critical habitats is needed, along with an indication of how their flows, water quality, and ecological values will be protected or enhanced by the plan change.

Canterbury mudfish

82. The ecology report notes that *"Maintenance of Canterbury mudfish habitat is not necessarily at odds with a plan change, but identification of habitats is critical as early as possible in the planning process."* Given their Nationally Critical conservation status, the suggestion that Canterbury mudfish could be present is of great significance to the proposed plan change. Sampling for mudfish is therefore essential before a new Outline Development Plan can be considered.

Freshwater mussels (kākahi)

83. The ecology report notes that kākahi could be present in the Collins Drain tributaries, but there has been no dedicated survey. Kākahi are a declining species and they are uncommon in Canterbury. They are present in the wider catchment, but are vulnerable to common waterway management practices, such as sediment removal. If there is potential kākahi habitat present, then it should be surveyed for kākahi and the plan change should take into account protection and enhancement of kākahi habitat.

Proposed District Plan

84. Council notified its Proposed District Plan on 5th October 2020. While the list of statutory documents to be considered when changing a district plan, as prescribed in s74 and s75 of the RMA, does not include a Proposed District Plan, case law¹ suggests that s74 is not an exhaustive list and that scope exists to consider the provisions of the Proposed District Plan. As such, please provide an assessment of the request against the relevant provisions of the Proposed District Plan, and in particular those provisions that have immediate effect.

Process from here

Once we have received a response to the above requests, it may be necessary to ask for further clarification of the extent to which this response addresses the above requests.

Whilst you may decline to provide the above information (Clause 23(6)), you need to be aware that the Council may reject the request on this basis.

Once the Council is satisfied that it has adequate information, a report will be finalised to consider and make a recommendation on how to deal with your request.

Please contact me on (03) 347 1809 or jocelyn.lewes@selwyn.govt.nz if you have any questions.

Yours faithfully
SELWYN DISTRICT COUNCIL

A handwritten signature in black ink, appearing to read 'J Lewes'.

Jocelyn Lewes
Strategy and Policy Planner

¹ *Kennedys Bush Road Neighbourhood Association v Christchurch City Council* (W063/97, at page 20) and *Canterbury Regional Council v Waimakariri District Council* (C94/99, at page 15)