

Before the Selwyn District Council

under: the Resource Management Act 1991

in the matter of: Proposed Private Plan Change 69 to the Operative
District Plan: Lincoln South

and: **Rolleston Industrial Developments Limited**
Applicant

Statement of Evidence of Jeremy Phillips (Planning)

Dated: 4 November 2021

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STATEMENT OF EVIDENCE OF JEREMY PHILLIPS

INTRODUCTION

- 1 My full name is Jeremy Goodson Phillips. I am a senior planner and Director practising with Novo Group Limited in Christchurch. Novo Group is a resource management planning and traffic engineering consulting company that provides resource management related advice to local authorities and private clients.
- 2 I hold the qualifications of a Bachelor of Science from the University of Canterbury and a Master of Science with Honours in Resource Management from Lincoln University, the latter attained in 2001. I am an intermediate member of the New Zealand Planning Institute, a member of the Resource Management Law Association and a member of the Institute of Directors. I have held accreditation as a Hearings Commissioner under the MfE Making Good Decisions programme since January 2010 and have held endorsement as a Chair since January 2013.
- 3 I have 19 years of experience as a resource management planner, working within and for territorial authorities, as a consultant, and as an independent Hearings Commissioner. I have particular experience in urban land use development planning in Greater Christchurch, predominantly as a consultant to property owners, investors and developers.
- 4 Of relevance this evidence, my experience in Rolleston and Selwyn District includes extensive consenting work under the operative District Plan, and policy analysis and evidence on changes to the Plan directed under the Land Use Recovery Plan. More recently, my experience includes the review of, and evidence on, the proposed Selwyn District Plan and its Strategic Directions and Urban Growth chapters.
- 5 Notably, I have recently provided evidence on Proposed Private Plan Change 73 to the Selwyn District Plan which addressed a number of matters that are also relevant to Plan Change 69.
- 6 I am familiar with the plan change application by Rolleston Industrial Developments Limited (*the Applicant*) to rezone approximately 190 hectares of land on Springs Road, Lincoln to enable approximately 2,000 residential sites and three small commercial zones.
- 7 I have visited the site and surrounding area on a number of occasions, most recently on 2 November 2021.

CODE OF CONDUCT

- 8 Although this is not an Environment Court hearing, I note that in preparing my evidence I have reviewed the Code of Conduct for Expert Witnesses contained in Part 7 of the Environment Court Practice Note 2014. I have complied with it in preparing my evidence. I confirm that the issues addressed in this statement of evidence are within my area of expertise, except where relying on the opinion or evidence of other witnesses. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

SCOPE OF EVIDENCE

- 9 My evidence is presented on behalf of Rolleston West Residential Limited, the Applicant in these proceedings.
- 10 In preparing my evidence I have reviewed the evidence of:
- 10.1 Mr David Compton-Moen – urban design, landscape and visual effects;
 - 10.2 Ms Nicole Lauenstein – urban design;
 - 10.3 Cathy Nieuwenhuijsen – air quality;
 - 10.4 Donovan Van Kekem – air quality;
 - 10.5 Mr Fraser Colegrave– economics;
 - 10.6 Mr Gregory Akehurst – economics;
 - 10.7 Mr Michael Copeland – economics;
 - 10.8 Mr Gary Sellars – valuer;
 - 10.9 Mr Chris Jones – market demand;
 - 10.10 Mr David Smith – transport modelling;
 - 10.11 Mr Nicholas Fuller – transport;
 - 10.12 Ms Laura Drummond - ecology
 - 10.13 Mr Mark Taylor – ecology
 - 10.14 Mr Bas Veendrick – hydrology;
 - 10.15 Eoghan O’Neil - flooding/stormwater

- 10.16 Mr Timothy McLeod – infrastructure;
 - 10.17 Mr Paul Farrelly – greenhouse gas emissions;
 - 10.18 Ms Katherine McCusker – versatile soils;
 - 10.19 Mr Chris Thompson – geotechnical matters; and,
 - 10.20 Mr Timothy Carter – company evidence.
- 11 I have also considered:
- 11.1 The Section 42A Report prepared by the Council (the Officer's Report); and
 - 11.2 Other statutory documents as listed in my evidence, including the National Policy Statement on Urban Development 2020 (NPS UD), the National Policy Statement on Freshwater Management 2020 (NPS FM), and non-statutory documents including "Our Space 2018-2048: Greater Christchurch Settlement Pattern" (Our Space).
- 12 Consistent with the approach adopted in the Officer's Report, my evidence is structured as follows:
- 12.1 The proposal and site description;
 - 12.2 Assessment of issues, including those raised by submitters and in the Officer's Report;
 - 12.3 Statutory analysis, including relevant statutory documents; and
 - 12.4 Consideration of alternatives, costs and benefits.
- 13 As noted in paragraph 5 above, I have recently provided evidence on Plan Change 73 which addressed a number of matters that are also relevant to Plan Change 69. On that basis, my evidence here adopts a similar structure and/or repeats that evidence, to the extent that it is relevant and appropriate to do so.
- 14 Also, this evidence attempts to minimise repetition of the Officer's Report and instead focus on points of difference. Accordingly, if a matter is not specifically dealt with in this evidence, it can be assumed that there is no dispute with the position set out in the Officer's Report.

SUMMARY OF EVIDENCE

- 15 In summary, I share the Officer's view that *'In terms of the proposal's inconsistency with Objective B4.3.3/Policy 4.3.1 of the District Plan and various provisions within the CRPS/Our Space that direct the location of growth, ... this is outweighed by the significance of the development capacity provided by the proposal¹'* and the corresponding provisions in the NPS-UD. In terms of those provisions, I consider weight should be afforded to:
 - 15.1 The significant development capacity offered by the Proposal; its contribution to well-functioning urban environments, improved housing affordability and enablement of housing in an area with high demand relative to other areas; and, its ability to integrate with infrastructure planning and funding.
 - 15.2 The NPS-UD imperatives for 'responsive' decision making and providing 'sufficient development capacity' 'at all times' (particularly given the evidence that there is insufficient capacity); and
 - 15.3 The requirement to give effect to the NPS-UD as a higher order document which prescribes objectives and policies for a matter of national significance and has primacy over the CRPS.
- 16 I also agree with the Officer's view that *'before being able to rely on Policy 8 of the NPS-UD, PC69 must also demonstrate that it contributes to well-functioning urban environments (as defined by Policy 1 of the NPS-UD)'²*. To the extent that the officer concludes that this requirement may not be achieved for the reasons they express in paragraph 296 (a)-(n), such matters in summary relate to:
 - 16.1 Flooding and stormwater management;
 - 16.2 Site hydrology and the proposal's effects on water bodies, freshwater ecosystems and associated ecological values;
 - 16.3 Potential reverse sensitivity effects, associated with the establishment of dwellings within 150m of the former wastewater storage pond;
 - 16.4 Transport related effects; and
 - 16.5 Urban form and connectivity, particularly in terms of connectivity to and through adjacent land to the north of the PC69 site.

¹ Officer's report, paragraph 294.

² Officer's report, paragraph 295.

- 17 I consider such matters have been addressed in the evidence provided by the experts referred to in paragraph 10 above and in the resulting amendments to the ODP (and associated ODP text).
- 18 More specifically, I have set out in Table 1 below how the the unresolved matters listed in paragraph 296 (a)-(n) of the Officer's report have been addressed.

Table 1: Assessment of unresolved issues listed in the Officer's Report.

Unresolved issues noted in paragraph 296 of Officer's Report	Resolution
<i>a) The adequacy of the flood mapping currently available and relied on by the applicant given the significant ground level changes upstream of the site as a result of the adjoining residential development.</i>	The evidence of Mr O'Neil considers the adequacy of flood mapping currently available and its application to the assessment of PC69. He concludes that the amended ODP provisions, removal of the Living X zone, and the subdivision and stormwater consenting requirements for any development will provide sufficient control to ensure that additional modelling and appropriate stormwater management occurs. Mr O'Neil does not consider that additional modelling is integral to the decision to rezone the PC69 area.
<i>b) The appropriateness/suitability of Living X development (minimum 2,000m2 allotments) within areas below RL 4m that are known to be subject to inundation from the Ararira/LII River at the eastern end of the site.</i>	Mr O'Neill's evidence addresses the appropriateness/suitability of Living X development (minimum 2,000m2 allotments) within areas below RL 4m that are known to be subject to inundation from the Ararira/LII River at the eastern end of the site. He concludes that residential development in this location is not appropriate, and on this basis the Living X zone has been removed from the proposal and the ODP has been amended accordingly.
<i>c) The need for initial modelling being undertaken to establish the appropriate size and location of stormwater management areas given that significant parts of the site, which are included as stormwater management areas, are subject to inundation from the Ararira/LII River.</i>	Mr O'Neill's evidence also accepts the need for initial modelling being undertaken to establish the appropriate size and location of stormwater management areas. However, he concludes that it is appropriate to provide for such modelling at the time of subdivision consent, when the detailed subdivision and stormwater design is confirmed.
<i>d) Whether all springs have been adequately identified and mapped on the ODP. All springs should be included within reserve areas (either recreation or stormwater).</i>	The evidence of Mr Veendrick, Ms Drummond and Mr Taylor addresses site hydrology, water bodies, freshwater ecosystems and associated values. Based on this evidence, amendments to the ODP text now provide for setback requirements over and above the standard 10m setbacks under rules 2.1.1.4 and 4.15.1, a requirement for groundwater levels to be assessed and managed, and implementation of an Ecological Management Plan. These measures are appropriately implemented at the time of subdivision consent and will afford suitable protection for water bodies.
<i>e) The reduction in ecological value and extent of wetlands and springs within the plan change area as a result of residential development.</i>	As described under point (d) above, amendments to the ODP text will ensure the protection and enhancement of water bodies and freshwater ecosystems within the ODP area.
<i>f) The potential impacts on existing Council infrastructure through reverse sensitivity effects arising from the removal of the 150m setback provided by Rule 4.9.32, and the ability for it to be used in</i>	Ms Nieuwenhuijsen's evidence has considered the use of the ponds for storage during storm events and as contingency storage for wastewater network resilience. For storm events, she concludes that there is likely to be less than minor potential for offsite odour effects. For emergency storage events, she acknowledges the potential for odour offsite, but due to the low frequency and short

<i>the most efficient and effective way to cater for future growth in the reticulated wastewater network.</i>	term nature of this, does not consider that the 150m buffer is required to mitigate odour effects. Mr Van Kekem's evidence draws an equivalent conclusion.
<i>g) The proposed roading network in the ODP having limited connectivity with the existing Lincoln network with a single direct road connection and three direct pedestrian/cycleway connections along the three kilometre northern boundary. Best practice would suggest that connections should be provided within walkable distances along the boundary without requiring pedestrians to double-back, or spaced at approximately 400 metre intervals.</i>	<p>It is acknowledged that the proposed roading network in the ODP has limited connectivity with the adjacent residential land to the north due to constraints on that land. This results in a single road connection (to Verdeco Park) to the north for that part of the PC69 site on the western side of Springs Road, and one potential connection (to Te Whāriki) to the north on the eastern side of Springs Road. However, based on the evidence of Mr Fuller, Mr Compton-Moen and Ms Lauenstein such roading connections are not necessary from a transport or urban design perspective, noting that:</p> <ul style="list-style-type: none"> (i) good pedestrian/cycle connectivity and permeability is achieved at and along this boundary; (ii) there is no need for car-based travel through these adjacent areas given: <ul style="list-style-type: none"> (A) the traffic modelling and assessment of road network performance; (B) the accessibility provided for vehicles via arterial routes to the Lincoln town centre and destinations to the north; and (C) the convenience needs of residents being met within the PC63 site by the three proposed commercial centres. <p>Noting the above, the limited road network connectivity to the north should not preclude the rezoning.</p>
<i>h) The ODP being amended to include: the requirement for frontage upgrades for Springs Road and Collins Road; identifying additional walking and cycling routes; and identifying new roundabout/traffic signals on the connection points to Springs Road.</i>	As recommended in the s42a report, the ODP has been amended to include: the requirement for frontage upgrades for Springs Road and Collins Road; additional walking and cycling routes; and new roundabout/traffic signals on the connection points from the PC69 site to Springs Road.
<i>i) Insufficient consideration of the effects of PC69 on Springs Road, between Lincoln and Prebbleton. Traffic modelling indicates a significant increase in traffic due, which in turn may affect safe turning movements at intersections and the amenity of Prebbleton residents.</i>	The effects of PC69 on Springs Road, between Lincoln and Prebbleton have been addressed in the evidence of Mr Fuller who notes that the Selwyn Long-Term Plan (LTP) provides for road network upgrades in the Prebbleton area that will, among other things, encourage traffic to bypass Prebbleton and improve the performance of key intersections. Such works will likely be completed well before PC69 is fully developed and in Mr Fuller's opinion will ensure the wider traffic effects of PC69 are acceptable.
<i>j) Insufficient consideration of the effects on Springs Road, between the site and Gerald Street. Traffic modelling indicates that Springs Road will be reaching capacity for an urban road, which in turn will affect turning movements at intersections and pedestrian/cyclist crossing opportunities adjacent to Lincoln University.</i>	Mr Fuller's evidence has addressed the effects of PC69 on Springs Road, between the site and Gerald Street, including turning movements at intersections and pedestrian/cyclist crossing opportunities adjacent to Lincoln University. Mr Fuller concludes that the effects of PC69 in respect of these matters will be acceptable.
<i>k) The feasibility of the upgrade of Moirs Lane to Collector Road standard, which must also include</i>	The evidence of Mr McLeod and Mr Fuller confirms that Moirs Lane has a 20.12m corridor width that is legally available and is sufficient

<i>providing for existing Rail Trail link and crossing point on Ellesmere Road.</i>	to achieve a Collector Road standard, with provision for the existing Rail Trail link and crossing point on Ellesmere Road.
<i>l) The timing of the required upgrade of Ellesmere Road between Moirs Lane and Edward Street to a Collector Road standard in conjunction with any road connection from PC69 to Moirs Lane.</i>	Based on the recommendations in the Officer's report and Mr Fuller's evidence, the ODP text has been amended to specify the extent of development permitted to occur prior to a number of road network improvements, upon which PC69 relies.
<i>m) The ability for Council to consider the proportional effect that PC69 will have on network hotspots (such as Gerald Street) and assumed intersection improvements contained in the 2031 Lincoln Paramics model, the subsequent impact on programmed funding within the Long Term Plan, and whether these new projects now required as a result of PC69 should be added to the Long Term Plan; or alternatively whether the re-zoning should be deferred until such time as these upgrades are in place.</i>	Consistent with the preceding point, the ODP specifies the road network upgrade pre-requisites to development of the PC69 site. Subject to these measures (and those described in points (g) to (l) above) the transport effects of the proposal will be acceptable.
<i>n) Whether sufficient provision has made to accommodate a new school site.</i>	The plan change proponent is strongly supportive of school facilities establishing within the PC69 site but recognises that such facilities will ultimately be determined by the Ministry of Education. Based on consultation with the Ministry in regards PC73 and PC69 and noting their submission, the ODP has been amended to specifically recognise the potential for school site(s) to be provided within the ODP area subject to a needs assessment by the Ministry. This is understood to address the Ministry's submission in respect to facilitating the establishment of school facilities within the PC69 site.

- 19 In reliance on the evidence referred to in paragraph 10 and accounting for the conclusions and recommendations of that evidence as summarised in paragraph 18 and **Table 1**, I consider that the relevant outstanding issues (including those raised in submissions) which are summarised in paragraph 296 of Mr Boyes evidence have been addressed through amendments to the proposal.
- 20 On this basis, I consider that the adverse effects of the proposal can or will be avoided, remedied or mitigated to an acceptable standard and the proposal will contribute to well-functioning urban environments.
- 21 For the same reason, I also consider that the proposal will give effect to the NPS-UD (and NPS-FM), and give effect to the CRPS and achieve consistency with the operative District Plan (except for

those directive provisions regarding urban growth which are resolved by Policy 8 of the NPS-UD). I do not consider the proposal will result in any significant conflict with other relevant statutory or non-statutory documents or plans as referred to in the Plan Change request or the Officer's report.

- 22 Overall therefore, I consider that the Proposal is the most appropriate way of achieving the purpose of the Act, and that the purpose of the Act is achieved.
- 23 On the basis of the views expressed above, I consider the Plan Change should be approved.

THE PROPOSAL AND SITE DESCRIPTION;

Site and Surrounding Environment

- 24 A description of the site and surrounding environment is provided in the Officer's Report³. I concur with that description and otherwise note that a more detailed description of the site and surrounding environment is otherwise contained in the Landscape and Visual Impact Assessment attached as Appendix Eb to the Section 32 report included with the Request.

Description of the Proposal

- 25 A full description of the proposal is provided in the Application document and is summarised in the Officer's Report. In summary, the proposal provides for:
 - 25.1 The rezoning of approximately 190 hectares of land adjoining the southern boundary of the Lincoln Township from Rural (Outer Plains) to Living Z and Business 1 (Local Centre). The Living X zoning previously proposed is to be deleted in response to the recommendations in the Officer's report.
 - 25.2 This would enable approximately 2,000 residential sites and a single commercial area. Two additional commercial areas are now proposed in response to the recommendations in the Officer's report.
 - 25.3 Provision for an Outline Development Plan (ODP), inclusive of primary and secondary roading routes, neighbourhood parks and landscaping requirements. Amendments to the ODP (and its corresponding text) are now proposed in response to the recommendations in the Officer's report.

³ See Officer's Report paragraphs 20-31.

- 25.4 Adopting existing Living Z and Business 1 zone rules without amendment.
- 25.5 Adopting existing Living X zone rules without amendment other than by way of an amendment to rule 4.1.1 in order to set minimum finished floor levels for the subject land.
- 26 In response to matters raised in submissions and in the Officer's Report and based on the evidence referred to in paragraph 10, amendments are now made to the proposal. Such amendments are set out in **Attachment 1** to this evidence. In summary, the amendments entail:
- 26.1 Deletion of the proposed Living X zone for the eastern part of the site and instead denoting this as a stormwater management area. As a result of this amendment, the corresponding amendment originally proposed to rule 4.1.1 in order to set minimum finished floor levels for the Living X zone is no longer required and is deleted.
- 26.2 Addition of two additional Business 1 zoned centres, in the eastern and western parts of the PC69 site.
- 26.3 The ODP layer diagrams are proposed to be deleted, with a single ODP (and associated text) relied on instead. This is proposed noting that the layer diagrams (unnecessarily) repeat the detail that is otherwise shown on the main ODP plan. It is also proposed to achieve greater consistency with Council's current drafting convention for ODPs and Development Areas⁴ which is understood to prefer the use of a single plan with key details shown and accompanying text relied on to provide for more detailed site specific requirements.
- 26.4 Additional wording in the ODP text to further detail the development outcomes envisaged for the block, including:
- (a) More explicit definition of the stormwater management area and stormwater management requirements;
 - (b) Recognition of road network upgrades required as a pre-requisite to development occurring;
 - (c) Recognition of new educational facilities potentially being provided following a needs assessment by the Ministry of Education; and

⁴ As referred to in the National Planning Standards.

- (d) More explicit recognition of water bodies and freshwater ecosystems within the block and the measures adopted to protect and enhance these features and their values.

26.5 Amendments to the ODP plan to address issues raised in the Officer's Report (and submissions), including:

- (a) Amendments to the low lying eastern extent of the ODP, to remove the Living X zone, denote this part of the ODP area as a stormwater management area and stormwater wetland/reserve;
- (b) Enlargement and amendments to the reserve corridor adjacent to Springs Creek and the heritage setting of Chudleigh;
- (c) Amended road, pedestrian and cycle connections to adjacent residential land to the north and deletion of the road link to/through Liffey Springs;
- (d) Gateway, roundabout and signals treatments on Springs Road at key intersections;
- (e) Additional pedestrian and cycling routes and green links through the PC69 site, including strong east-west and north-south connections linking to adjacent land and the existing pedestrian and cycling facilities in Te Whāriki; and
- (f) Two additional Business 1 zones.

ASSESSMENT OF ISSUES, INCLUDING THOSE RAISED BY SUBMITTERS AND IN THE OFFICER'S REPORT

SUBMISSIONS

- 27 The Officer's Report confirms that 255 submissions and 7 further submissions were received on PC69. I agree with the Officer's identification of key matters raised in these submissions warranting consideration and their rationale for an issue-based approach to evaluating these submissions⁵. I address these same matters in my evidence below.

⁵ Officer's Report paragraph 46-47.

RESPONSE TO SECTION 42A REPORT

- 28 For ease of reference my evidence adopts the same sub-headings set out in the Officer's Report.
- 29 For brevity and to avoid repetition, I record my agreement with the Officer's assessment of the following matters, for the reasons stated in their report and otherwise noting the equivalent conclusions in the PC69 request and/or in the evidence referred to in paragraph 10 of my evidence:
- 29.1 Geotechnical Considerations;⁶
 - 29.2 Land Contamination;⁷
 - 29.3 Open Space Reserves Assessment;⁸ and
 - 29.4 Environmental Quality.⁹
- 30 The remaining issues listed below that are addressed by the Officer are considered further in the following section of my evidence:
- 30.1 Versatile Soils;¹⁰
 - 30.2 Flooding;¹¹
 - 30.3 Groundwater Table / Springs;¹²
 - 30.4 Aquatic / Freshwater Ecology;¹³
 - 30.5 Infrastructure Servicing (Water / Wastewater / Stormwater);¹⁴
 - 30.6 Reverse Sensitivity;¹⁵

⁶ Officer's Report paragraphs 50-52.

⁷ Officer's Report paragraphs 53-56.

⁸ Officer's Report paragraphs 124-133.

⁹ Officer's Report paragraphs 181-182.

¹⁰ Officer's Report paragraphs 57-65.

¹¹ Officer's Report paragraphs 66-73.

¹² Officer's Report paragraphs 74-80.

¹³ Officer's Report paragraphs 85-95.

¹⁴ Officer's Report paragraphs 96-113.

¹⁵ Officer's Report paragraphs 114-123.

30.7 Urban Design;¹⁶

30.8 Transportation / Traffic Effects on the Roothing Network;¹⁷

30.9 Educational Facilities;¹⁸ and

30.10 Medical / Shopping/ Emergency Services.¹⁹

Versatile Soils

- 31 At paragraphs 64-65, Mr Boyes concludes that PC69 would represent *'a moderate loss of the overall Class 1 and Class 2 versatile soil resource within the region'* but concedes that this *'is mitigated to some extent by the soils within PC69 area being heavier and poorly drained when compared to other areas containing Class 1 and 2 soils around Lincoln, including those to the northwest which have recently been developed for urban purposes'*.
- 32 Ms McCusker's evidence provides more detailed consideration of the site's soil resources and concludes that only 4.6 hectares (2%) the PC69 site's soils are suited for agricultural production, and *'the remaining 189 hectares (99% of the property) are imperfectly or poorly drained soils. The imperfectly or poorly drained nature of these soils provides limitations for agricultural use'*. Ms McCusker goes on to conclude that these 4.6 hectares of medium soils in the PC69 site represent only 0.005% of the 95,690 hectares of soils suitable for multiple land uses in the Selwyn Te Waihora sub region²⁰.
- 33 Based on Ms McCusker's evidence, I do not consider that site's soil resources make the land unsuitable for residential development and the small loss of medium soils constitutes a very small cost when weighed in the balance of the benefits, costs and risks of allowing PC69.

Flooding

- 34 As noted by Mr Boyes, a number of submissions raised concerns in regards flooding from the Arariri/LII River. Mr Boyes, reliant on Mr Morris identifies two primary matters in relation to flooding²¹:

¹⁶ Officer's Report paragraphs 134-153.

¹⁷ Officer's Report paragraphs 154-172.

¹⁸ Officer's Report paragraphs 174-176.

¹⁹ Officer's Report paragraphs 177-180.

²⁰ Evidence of Katherine McCusker, paragraphs 22-23.

²¹ Officer's report paragraph 72.

- 34.1 The adequacy of the information base (flood models and mapping) relied on to assess flood hazard, in light of recent upstream development and at the Te Whāriki subdivision especially given the bunding along the PC69 boundary. And, whether this modelling should be updated as part of the plan change or at the time of subdivision consent.
- 34.2 The appropriateness of Living X development (minimum 2,000m² allotments) within areas that are known to be subject to inundation (below RL 4m) at the eastern end of the site.
- 35 The evidence of Mr O'Neill concludes that development of the Living X zone below the 4m contour at the site is not appropriate. Conversely, development of land above the 4 m contour is appropriate subject to further modelling being undertaken to accurately delineate and manage overland flow paths through the site. Mr O'Neill further considers that there are sufficient controls in place to require this additional modelling to be carried out prior to the lodgement of a stormwater consent application to Environment Canterbury or a subdivision consent application and with the removal of the Living X zoning, additional modelling is not integral to the decision to rezone the PC69 area.
- 36 In summary, in regards flood hazard risks, I consider the subject land is suitable for development consistent with the (amended) zoning proposed in PC69.

Groundwater Table / Springs

- 37 Mr Boyes questions whether the request adequately considers matters relating to inundation and groundwater levels of the site, particularly those eastern areas subject to inundation. In his view, these are not matters that can be appropriately left to the subdivision consent stage²².
- 38 Consistent with my evidence above on flooding, I disagree and consider that it is more efficient, effective and appropriate to deal with such matters at the time of subdivision; provided that:
- 38.1 There is general confidence in the suitability of the land for the zoning proposed, in regards these matters; and,
- 38.2 There are clear methods for addressing such matters at the time of subdivision.
- 39 The evidence of Messrs Veendrick, O'Neil, Thompson and McLeod addresses land suitability and concludes that this issue is not an

²² Officer's report, paragraph 80.

impediment to the proposed rezoning, provided that the Living X zone and residential development below the 4m contour is removed from the proposal (as is the case). Ms Drummond and Mr Taylor also consider that the protection and enhancement of waterbodies (including springs) on the site can be achieved, considering the proposed rezoning and ODP.

- 40 I also note that Mr Morris for the Council *'acknowledge(s) that in principle, ground water issues may be addressed by appropriate design and construction'*. To the extent that he qualifies this statement by noting that *'the information provided to us thus far does not necessarily indicate specific details of how groundwater issues will be addressed to enable development'*, the subsequent examples of design and construction solutions he provides are matters that would normally be determined at the time of subdivision, including:
- *'Appropriate siting of dwellings, reserves and stormwater management infrastructure.'*
 - *Appropriate cut and fill activities. Filling may not necessarily mitigate all issues with a high ground water level e.g. changes in hydraulic gradient may cause springs to relocate.*
 - *Suitable drainage.*
 - *Necessary design standards/specifications to achieve infrastructure that is durable long term. For example, pavement depth and construction materials, and stormwater/wastewater chamber uplift resistance²³.*
- 41 As to the methods for ensuring such matters are adequately addressed at the time of subdivision, I note that the following regulatory controls will apply:
- 41.1 Section 106 assessment at the time of subdivision;
 - 41.2 Subdivision assessment matters;
 - 41.3 Assessment of resource consents with regards to the NES-F and NPS-FM;
 - 41.4 Existing/operative waterbody setback rules;
 - 41.5 Requirements in the ODP.
- 42 On this basis and accounting for the removal of the Living X zone in the lower eastern part of the site, I consider that there is sufficient

²³ Officer's report Appendix C, page 4.

confidence and evidence to conclude that the rezoning proposed is appropriate, insofar as land suitability and ground water. Moreover, the methods described above will adequately provide for more detailed evaluation of such matters at the time of subdivision.

Aquatic / Freshwater Ecology

- 43 The PC69 site is subject to various springs, drains and natural waterways of varying ecological significance and a number of submissions relate to effects on these waterbodies and their ecological values.
- 44 As notified, PC69 proposed adherence to the 10m waterbody setback rules in the operative District Plan, fencing controls, placement of reserves alongside key waterways, and a stormwater management approach entailing first flush basins, detention basins and wetlands.
- 45 In the Officer's Report, Mr Burrell concludes that these measures are insufficient (particularly the 10m setback), noting that a buffer of 30-100m around springs, wetlands, and other waterbodies will both mitigate against hydrological effects, but also improve ecological connectivity and integrity of the wetland area, by increasing the overall reserve size.
- 46 The evidence of Ms Drummond, Mr Taylor and Mr Veendrick has accounted for these concerns and has recommended amendments to the ODP that are now incorporated in **Attachment 1** to this evidence. Among other things, those amendments require:
 - 46.1 Detailed groundwater level investigations and the implementation of mitigation measures to avoid the diversion of shallow groundwater flows;
 - 46.2 Implementation of an Ecological Management Plan, including wetland delineation and buffer definition; and
 - 46.3 Minimum waterbody setbacks of:
 - (a) 20m from Springs Creek.
 - (b) 30m from springheads.
 - (c) 10m from channelized waterways.
- 47 Based on these measures, Ms Drummond concludes '*that with careful subdivision design a net ecological betterment at the site is achievable, when compared to current conditions*'.

- 48 Accounting for the amendments summarised above and the evidence of Ms Drummond, Mr Taylor and Mr Veendrick I consider that the value and extent of freshwater bodies (including wetlands and springs) and their ecological values will be protected and enhanced. As set out later in my evidence, this outcome is consistent with the relevant policy provisions in the NPS-FM and NES-F. Accordingly, I consider that any effects on freshwater bodies and their ecological values will be acceptable.

Infrastructure Servicing (Water / Wastewater / Stormwater)

- 49 I understand from the Officer Reports by Mr Boyes and Mr England and from the evidence of Mr McLeod that water and wastewater infrastructure demands from PC69 can be accommodated and are not an impediment to the Proposal.
- 50 In respect of stormwater, challenges with the lower lying eastern portions of the site are identified by Mr Boyes and Mr England and are acknowledged in the evidence of Mr McLeod and Mr O'Neill. Based on Mr O'Neill's evidence, the Living X zone below the 4m contour has been removed from the proposal. Mr O'Neill otherwise considers that the balance of the land can be assessed in greater detail at the subdivision stage, and that is the more efficient and appropriate timeframe for determining detailed design accounting for subdivision layout and detailed stormwater analysis. I accept Mr O'Neill's evidence and agree with his conclusion in this regard.
- 51 Accounting for the evidence of Mr Taylor and Ms Drummond, I otherwise agree with Mr England's recommendation that: clean spring water and untreated stormwater should be segregated; and the diversion of the Lincoln Main Drain should be naturalised. These recommendations have been incorporated in the text of the amended ODP.
- 52 In summary, for the above reasons I do not consider that infrastructure servicing precludes the proposed zoning sought by PC69.

Reverse Sensitivity

- 53 Mr Boyes considers that retention of the 150m setback from the Lincoln WWTP protects the designated Council asset and future proofs its ability to be used in the most efficient and effective way to cater for future growth.
- 54 However, Ms Nieuwenhuijsen's evidence notes that the WWTP is no longer used (or consented) for sewage treatment. Instead, the tanks and pond are used to buffer flows to the Pines Wastewater treatment plant during storm events and the tanks and pond are made available for emergency wastewater storage events only.

- 55 Council's odour expert Mr Bender agrees that the temporary storage of dilute wastewater is unlikely to result in adverse odour effects beyond the pond site boundary and the principle reverse sensitivity concern relates to the potential temporary storage of wastewater during emergency events.
- 56 Accordingly, Ms Nieuwenhuijsen has considered the use of the ponds for storage during storm events and as contingency storage for wastewater network resilience. For storm events, she concludes that there is likely to be less than minor potential for offsite odour effects. For emergency storage events, she acknowledges the potential for odour offsite, but due to the low frequency and short term nature of this, does not consider that the 150m buffer is required to mitigate odour effects.
- 57 Mr Van Kekem draws an equivalent conclusion, noting the predicted 1 in 20 year occurrence where an emergency event would necessitate the use of the pond for storage of untreated wastewater to be a very infrequent occurrence. Further, Mr Van Kekem notes that the potential that this occurs and the wind direction is blowing towards a neighbouring receptor and the odour dispersion conditions are such that an odour would be detectable within the PC69 site will be even lower.
- 58 Reliant on the evidence of Ms Nieuwenhuijsen and Mr Van Kekem I agree that maintaining a 150 m setback distance from this emergency storage pond is not required to avoid reverse sensitivity effects from very infrequent events. To maintain the setback would be inefficient, and costly relative to its benefits. Whilst the WWTP land use is designated in the District Plan, any future discharges associated with the treatment of sewage at the WWTP does not form part of the reasonably foreseeable future environment noting it is not permitted and would be subject to consenting requirements and further assessment under the Regional Plan at that time. Accordingly, accounting for the lawfully existing operations of the WWTP, I consider any reverse sensitivity effects associated with PC69 will be acceptable.

Urban Design

- 59 The Officer's Report sets out three urban design issues relevant to the proposed development of this particular site and its physical characteristics, being: the Lincoln context; connectivity; and landscape and visual amenity effects.

Lincoln Context

- 60 In regards Lincoln Context, Mr Boyes refers to Mr Nicholson's view that the scale of the development may affect its character meaning *'any decision which potentially affects both the character of the*

township and the capacity of the existing community facilities would be more appropriately addressed through a comprehensive spatial planning exercise, which includes a thorough consultation process with the community. [And] a private plan change, which is primarily concerned with the plan change area, does not allow for alternative growth options to be assessed and discussed with the community in order to promote agreed and coherent outcomes'.

- 61 In response, I note that the large scale of the plan change allows for comprehensive planning and management of effects in a way that may not otherwise be achievable with piecemeal, smaller scale proposals. Therefore, whilst not providing a Lincoln-wide assessment of growth options, the scale of the proposal offers positive outcomes and does allow for comprehensive planning of the southern extent of the Lincoln township occupied by the PC69 site.
- 62 As to Mr Nicholson's preference for a comprehensive spatial planning exercise occurring over a period of time, prior to growth occurring, I note the NPS-UD imperative for providing additional housing capacity in a responsive manner and the corresponding evidence of Messrs Jones, Sellars, Colegrave, Copeland and Akehurst. As I stated in response to the same concerns by Mr Nicholson on PC73, I consider that the location of land beyond identified areas for growth at the present point in time should not preclude approval of the plan change and the key matter in respect of this particular issue is whether the form and nature of the growth proposed, ahead of a strategic planning exercise undertaken with the luxury of time, is appropriate. Given the uncertain and potentially lengthy timeframes for a comprehensive planning exercise delivering additional zoned land and that PC69 is of a scale that provides for comprehensive planning for this part of Lincoln and provides for community participation through submissions, I do not consider Mr Nicholson's concerns should preclude the rezoning. I am reinforced of this view noting the evidence of Ms Lauenstein and Mr Compton-Moen concludes that a strategic planning exercise advocated by Mr Nicholson would likely lead to the same conclusion – that development of the PC69 land in the manner proposed is appropriate in terms of Lincoln's form and context.

Connectivity

- 63 In regards connectivity, the proposal provides good internal connectivity through its network of roads, pedestrian and cycle connections and reserves and the provision of three local commercial centres. The proposal also provides good pedestrian and cycle connectivity to the north, as described by Ms Lauenstein, Mr Compton-Moen and Mr Fuller, and Mr Nicholson has not raised any concerns in this regard.

- 64 Springs Road and Ellesmere Road via Moirs Road (which is of sufficient width to be upgraded) provide alternative roading connections to the north, and potential road connections to Verdecos Park and Te Whāriki are also provided for on the ODP.
- 65 Accounting for these attributes I consider the proposal provides a high level of connectivity for pedestrians and cyclists and for vehicles generally. To the extent that vehicle movements to the north and through the local road network of adjacent residential zones are limited, they are possible, but I do not consider they are integral to good urban design or the plan change. I also note Ms Lauenstein's conclusion that *'the lack of direct vehicular connectivity is in my opinion not a concern but a positive aspect of the design as it promotes the alternative active modes of movement, which for a township the size of Lincoln is very appropriate'* and that the *'proposed hierarchy of movement with cycling and pedestrian being a priority will create a better living environment than a car dominated one and will be more in keeping with the character and scale of Lincoln Township'*.
- 66 I provide further evidence regarding connectivity in paragraph 70 of my evidence.

Landscape and Visual Amenity

- 67 For landscape and visual amenity effects, I agree with Mr Boyes that *'residents located on the outskirts of existing townships cannot expect to enjoy a rural outlook for all time as townships do not remain static'* and *'the RMA and the District Plan do not require protection of the amenity derived from the current open character of the site for the enjoyment of surrounding landowners'*. A similar sentiment is expressed in Policy 6 of the NPS-UD which recognises that urban built form that gives effect to the NPS-UD *'may involve significant changes to an area, and those changes: (i) 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 (ii) are not, of themselves, an adverse effect'*.
- 68 In addition to the three urban design issues listed above in the Officer's Report I otherwise rely on and adopt the evidence of Mr Compton-Moen and Ms Lauenstein.

Transportation / Traffic Effects on the Roding Network

- 69 The Officer's Report states that the most significant transportation issue for PC69 *'relates to the connectivity, or lack thereof, of the PC69 area with the existing roading network'*. More specifically, I understand that this concern relates to connectivity for vehicles to:

the adjoining developments to the north; and to the east via Moirs Lane due to its width. The correct legal width of Moirs Lane and its sufficiency to accommodate a suitable upgrade and the Rail Trail pedestrian/cycling route has been confirmed by Mr McLeod and Mr Fuller, so I do not consider that this connection is a limitation on connectivity for the PC69 proposal. Insofar as connections to the north are concerned, Mr Collins assessment within Appendix J of the Officer's Report states:

'The potential future roading connections to Verdeco Park and Te Whāriki subdivisions, shown in the ODP, have been precluded by consented subdivisions. The potential future roading connection to Liffey Springs Road is feasible, however would require an alignment through a Council reserve and not proposed by PPC69. I consider that PPC69 will not be well connected to surrounding urban developments and will primarily rely on Springs Road and Ellesmere Road to connect with the existing Lincoln urban area. As a result, I consider that PC69 will have poor connectivity to adjoining urban areas, and lower active and public transport usage'.

70 In response to this statement I note:

- 70.1 A roading connection to Verdeco Park through the Business 2B zone is not precluded by the consented subdivision, noting this site is yet to be developed and it is understood that submissions on the proposed Selwyn District Plan are seeking that it be rezoned for residential purposes. Whilst other roading connections are precluded, a pedestrian / cycle connection is able to be provided as shown on the ODP.
- 70.2 A roading connection to Liffey Springs Road does not appear likely due to the intervening Recreation Reserve and the issues identified in Mr Rykers officer report. Accordingly, this road connection has been removed.
- 70.3 Road connections into Te Whāriki shown on the original ODP are challenging given the position of privately owned land, recreation reserves and freshwater bodies. Accordingly, these road connections have been removed, however pedestrian/cycle connections remain feasible and are shown on the ODP.
- 70.4 Road connections into Te Whāriki shown on the original ODP are challenging given the position of privately owned land, recreation reserves and freshwater bodies. Accordingly, these road connections have been removed, however pedestrian/cycle connections remain feasible and are shown on the ODP.

- 70.5 An alternative possible road connection into Te Whāriki has been identified through the utility reserve vested in Council and located to the southeast of Kaitorete Drive and Papatahora Drive in Te Whāriki. I understand that the utility purpose of this reserve may provide for establishment of a road by Council, in place of the existing stormwater facilities that would need to be offset within the PC69 site. On this basis, a road connection and cycle/pedestrian connection is shown up to this boundary on the amended ODP and would enable a road connection to and through Te Whāriki's road network to be established. I note however that this road connection is not relied on for the safe and efficient functioning of the road network or for urban design reasons, as is discussed in the evidence of Mr Fuller, Ms Lauenstein and Mr Compton Moen.
- 70.6 Good connectivity for all transport modes is achieved *within* the full area of the PC69 site, which is of a significant area.
- 70.7 Good connectivity for all transport modes is achieved in relation to the Springs Road arterial route, Collins Road to the south, and Moirs Lane/Ellesmere Road to the east.
- 70.8 The proposal has a very high degree of connectivity and accessibility for walking and cycling modes, accounting for connections within the PC69 area and its connectivity to the walking and cycling facilities within the residential developments to the north. The additional commercial centres proposed in the ODP and the site's proximity to the Lincoln town centre also support connectivity and accessibility.
- 70.9 Public transport facilities could, in time, be re-routed to pass through the site and/ or through Te Whāriki and Verdeco Park in locations that are accessible from the PC69 site by walking and cycling connections. Figure 5 in Mr Fuller's evidence provides an example of this.
- 71 Noting the points above, I do not agree with Mr Collins' conclusion that PC69 *'will have poor connectivity to adjoining urban areas, and lower active and public transport usage'*. Whilst connectivity by way of roading to the north is limited, a high degree of connectivity to the north is achieved for pedestrians and cyclists which is important noting that this supports active and public transport usage. I also note the evidence of Ms Lauenstein regarding the positive urban design outcomes of the proposed layout, in terms of incentivising these alternative transport modes over car-based travel.
- 72 The Officer's report otherwise details a number of unresolved issues relating to the transportation aspects of the Proposal. I rely on the

evidence of Mr Fuller (and Mr Smith) that such matters have been robustly assessed and with the amendments to the ODP will have acceptable effects that do not preclude the rezoning.

Educational Facilities

- 73 The plan change proponent is strongly supportive of school facilities establishing within the development area but recognises that the provision of such facilities will be determined by the Ministry of Education.
- 74 Based on consultation with the Ministry in regards PC73 and PC69 and their submission, the ODP has been amended to specifically recognise the potential for school site(s) to be provided within the ODP area, subject to a needs assessment by the Ministry. This is understood to address the Ministry's submission in respect to facilitating the establishment of school facilities within the PC69 site and provide the resolution anticipated by the Officer in paragraph 175 of their report.
- 75 Accounting for this change, the potential provision for educational facilities is adequately recognised and should not preclude the plan change.

Medical / Shopping/ Emergency Services

- 76 In response to concerns in the Officer's report and submissions regarding the needs of future residents for accessible commercial and other services, two additional Business 1 zoned centres are proposed in the east and western parts of the PC69 site. Consistent with the commercial centre proposed adjacent to Springs Road, these are intended to be of a small scale and focused on providing for the convenience needs of residents within a walkable distance. Accordingly, and as noted by the evidence of Messrs Fuller, Colegrave, Copeland and Akehurst these centres are not envisaged to result in any unacceptable traffic or retail distribution effects.
- 77 I also note that community facilities (such as preschools and medical centres) are commonly located within the District's Living zones. Whilst such activities would require resource consent as a discretionary activity under rule 10.8.3, they are generally enabled by the objectives and policies within section B2.3 of the District Plan, subject to the suitable management of adverse effects. Accordingly, I would expect community facilities to establish within PC69's proposed Living zones, in response to local and township demands.
- 78 In summary, I consider that local/convenience retail needs and community facilities are adequately recognised and provided for by PC69.

STATUTORY ANALYSIS

Functions of Territorial Authorities

- 79 Given the preceding evidence concludes that the adverse effects of the proposal will be acceptable and accounting for the adoption of existing District Plan provisions and the amended ODP (as the key regulatory methods for achieving integrated management of the effects of the proposal), I consider that the plan change will accord with the stated functions of territorial authorities in section 31 of the Act.

Part 2 Matters

- 80 Section 74(1)(b) requires any change to the District Plan to be in accordance with the provisions of Part 2 and the Officer concludes that the purpose of the Act and Part 2 matters are '*currently reflected in the settled objectives and policies of the District Plan which PC69 does not seek to change*'. I concur with this, and like the Officer, I revisit Part 2 matters below when evaluating PC73 in terms of s32.
- 81 To the extent that the Officer identifies and discusses the relevant matters in sections 6 and 7 of the Act, I agree that these are the relevant provisions. I also agree that:
- 81.1 The proposed larger site size for the Springs' O'Callaghan farmhouse ('Chudleigh') recognises and provides for the protection of historic heritage from inappropriate subdivision, use, and development.
 - 81.2 The efficiency of the end use of energy (s7(ba)) and the effects of climate change (s7(i)) are relevant and particular regard has been given to these matters in PC69 as set out in the evidence of Mr Farrelly.
 - 81.3 Other relevant matters in section 7 have been addressed in the effects assessment above and in the evidence listed in paragraph 10.

Statutory Documents

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

- 82 The Officer's report summarises his position on the NPS-UD as follows:

'In summary, I consider that the proposed development would add significantly to development capacity of greater Christchurch, that there is a potential risk of undersupply, and

the effects resulting from such undersupply on the efficient functioning of the housing market outweigh the risks associated with over supply where that additional supply can be serviced. However, making a significant contribution towards housing capacity is of course only part of the NPS-UD direction. I have set out above concerns regarding whether the applicant can sufficiently address other matters in order for this proposal to "contribute to well-functioning urban environment" as required by Policies 1 and 8. In my view that must occur before the threshold is met for "particular regard" being given to the development capacity provided by PC69. In any case, it is my understanding that any finding of 'significant' development capacity does not in itself require approval of the plan change; rather the significance of the capacity provided needs to be weighed up against other matters. As noted in the submission from the CCC, "while it is important to assess the plan change as unanticipated, the rationale for why development was directed to particular areas in the CRPS is relevant for determining the appropriateness of the proposal".'

- 83 I agree with this statement in its entirety. To the extent that the Officer expresses concerns as to whether the proposal can "contribute to well-functioning urban environments" accounting for their assessment of its effects, my preceding evidence and that of the experts listed in paragraph 10 has demonstrated how those issues will be addressed. I otherwise consider the rationale for why development was directed to particular areas in the CRPS later in my evidence.
- 84 For completeness and given the importance of the NPS-UD to this proposal and in order to address each provision in detail, I have included a tabular assessment of the relevant objectives and policies of the NPS-UD as **Attachment 2** to this evidence. I also provide below equivalent evidence to that which I provided on PC73.
- 85 For PC69, I consider the principal issues to be determined in respect of the NPS-UD are, in order:
- 85.1 Does Policy 8 apply, noting it and Subpart 2, clause 3.8 provides for the consideration of (and requires 'responsive decisions' for and 'particular regard to the development capacity provided by') proposals that are otherwise 'unanticipated' or 'out-of-sequence' with the CRPS and Selwyn District Plan and would likely 'fail at the first hurdle'? Specifically:
- (a) Will the plan change 'add significantly to development capacity'?

- (b) Will the plan change '*contribute*' to '*well-functioning urban environments*'?
- (c) Will development capacity enabled by the plan change be '*well-connected along transport corridors*'?

85.2 Is there '*at least sufficient development capacity to meet expected demand*' '*at all times*' as required of Councils by Policy 2? And is the information relied on to inform this determination '*robust*' and '*frequently updated*' as required by Objective 7?

85.3 Can a decision on the proposal be: integrated with infrastructure planning and funding, strategic over the medium and long term, and responsive as required by Objective 6.

85.4 Will the proposal be consistent with objective 8 that New Zealand's urban environments support reductions in greenhouse gas emissions?

86 The following section of my evidence addresses the questions posed above.

Policy 8

87 Based on the economic evidence of Messrs Copeland, Akehurst and Colegrave, it is clear that the proposal will '*add significantly to development capacity*', when viewed at any scale within a Greater Christchurch context.

88 I also consider that the development capacity enabled by the plan change will be '*well-connected along transport corridors*', given its proximity and direct access to the Springs Road arterial route and its connections to Rolleston, the State Highway 1 corridor and Christchurch city. To the extent that the site has limited local roading connections to the north, I do not consider these local roads to be '*transport corridors*' in the sense that the NPS-UD refers to them, though in any event I note that the proposal is well connected to the north for alternative transport modes.

89 In my view, the proposal will also contribute to well-functioning urban environments, for the reasons set out in my evidence above and the evidence referred to in paragraph 10 regarding the relevant issues and effects of the proposal.

90 To the extent that the Officer has some reservations about Policy 1(c) which seeks good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport I have assessed this in

paragraph 70 of my evidence and conclude that the proposal and amended ODP will satisfy this requirement.

- 91 As noted in **Attachment 2**, policy 1(c) does not specify what form the accessibility should take, it simply seeks good accessibility for all people. In that context, the site has very good accessibility given:

91.1 its proximity to the Springs Road arterial route, the internal local roading network, and the opportunity for local road connections to the north which provide good accessibility for those in vehicles;

91.2 the extensive provision for pedestrian and cycle accessibility (through paths and accessible local services) and scope for current and potential future public transport facilities to service the site; and

91.3 the varied densities, commercial centres, green links and reserves, and proximity to schooling.

- 92 I also note that the broader travel patterns of future occupants within this Plan Change site (in terms of their travel to/from Christchurch city or otherwise) would arise with any future greenfield development at Lincoln or in other townships beyond Christchurch city and a compact urban form increases the ability to contribute to the uptake of public transport opportunities, as well as reduced trip distances that enable active modes of transport.

- 93 In summary, I consider the proposal will: add significantly to development capacity; contribute to a well-functioning urban environment; and be well-connected along transport corridors. Accordingly, I consider the proposal satisfies the pre-requisites for policy 8 to be engaged.

Policy 2 and Objective 7

- 94 As to the issue of sufficient capacity, I am reliant on the evidence of Messrs Jones, Sellars, Copeland, Akehurst and Colegrave and their detailed reasoning. I accept their conclusions and accordingly I consider it clear that there will not be 'at least sufficient development capacity to meet expected demand' 'at all times' as required by Policy 2. Declining the Plan Change would clearly not improve this situation, whereas approving it would clearly give effect to the directives in the policy.

- 95 As a further comment on this policy, I consider the phrases 'at all times' and 'at least' within Policy 2 are significant and to not afford them significance by endeavouring to only provide 'sufficient development capacity' would render these terms superfluous. Assuming that the authors of Policy 2 intentionally stressed the need

to consider housing capacity at all times and err on the side of generosity, I consider a responsive approach towards proposals that add significantly to development capacity is warranted. Mr Boyes appears to hold a similar view, stating that *'the proposed development would add significantly to development capacity of greater Christchurch, that there is a potential risk of undersupply, and the effects resulting from such undersupply on the efficient functioning of the housing market outweigh the risks associated with over supply where that additional supply can be serviced'*²⁴. I agree with Mr Boyes in this regard.

Objective 6

- 96 Objective 6(a) requires decisions to be integrated with infrastructure planning and funding. As noted by the Officer and in the evidence of Mr McLeod and Mr Fuller, the plan change can be effectively integrated with the planning and funding of water and wastewater infrastructure, transport infrastructure, and other typical network infrastructure required at the time of subdivision. Mr Fuller's evidence concludes that the road network infrastructure, subject to upgrades that are proposed in conjunction with the proposal, can also accommodate the proposal. The evidence of Ms Nieuwenhuijsen and Mr Van Kekem also confirms that reverse sensitivity effects from the WWTP will be avoided, accounting for the lawful operation of this facility.
- 97 Objective 6 otherwise requires decisions to be strategic over the medium term and long term but reconciled with the requirement to also be responsive to proposals supplying significant development capacity, in the sense of *'reacting quickly and in a positive way'*²⁵. For PC69, I consider that the urban form, infrastructure and transport attributes of the proposal appropriately accounts for the medium and longer term and the corresponding evidence confirms that PC69 will not compromise strategic outcomes sought for these matters and the affected urban environment over these timeframes. This conclusion is also supported by the evidence on the effects of the proposal, its ability to contribute to a well-functioning urban environment, and its general consistency with relevant plan provisions (except where they are directive towards urban growth).
- 98 In summary, I consider the proposal satisfies the requirements in Objective 6.

²⁴ Officer's Report, paragraph 225.

²⁵ 27

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ponsive](https://www.oxfordlearnersdictionaries.com/definition/english/responsive?q=responsive)

Objective 8

- 99 In terms of supporting a reduction in greenhouse gas emissions, I draw attention to the language used in NPSUD objective 8(a) (and policy 1(e)) which seeks to 'support', rather than strictly 'require' reductions. I also note objective 8 is targeted at 'New Zealand's urban environments' whilst policy 1 seeks 'planning decisions that contribute to well-functioning urban environments'. Based on this language, I consider that the NPSUD is focused on New Zealand's urban environments as a whole and supporting reductions on this basis rather than strictly mandating reductions on a site-by-site basis. Whilst not a decision from the Court, I note that a similar conclusion was reached in similar circumstances by the Expert Consenting Panel for the fast tracked Faringdon South West and South East Resource Consents where they concluded that the applicant had *'addressed the issue [of greenhouse gas emissions], through design elements, as far as can be expected at this time under the current framework'*.
- 100 Regardless, in my assessment of policy 1(e) in **Attachment 2**, I note that the proposed ODP's provision for alternative transport modes, connectivity and accessibility, and the potential for servicing by public transport will directly *'support reductions in greenhouse gas emissions'*. The evidence of Mr Farrelly otherwise addresses how the proposal will 'support' reductions, including increased EV uptake and work-from-home, destocking and associated reduction of methane emissions, and reduced lifetime energy usage emissions associated with the predominant standalone housing typologies.
- 101 For these reasons and accounting for Mr Farrelly's evidence, I consider the proposal is consistent with objective 8, that *'New Zealand's urban environments support reductions in greenhouse gas emissions'*.

NPS-UD Summary

- 102 Accounting for my conclusions above and my more detailed assessment in **Attachment 2**, I consider that the proposal is strongly consistent with the NPS-UD. For the same reasons, I consider a decision to decline the proposal would be inconsistent with, or even contrary to, the NPS-UD.

National Policy Statement for Freshwater Management 2020 (NPS-FM) and National Environmental Standard for Freshwater (NES-F)

- 103 The key provisions and requirements of the NPS-FM and NES-F are summarised in Mr Boyes evidence and, with reference to the assessment of Mr Burrell, he concludes that the proposal will be inconsistent with the environmental policy and guidelines set out in

the NPS-FM, which are aimed at protecting and enhancing wetlands and springs.

- 104 Accounting for the amendments to the ODP and the evidence of Mr Veendrick, Ms Drummond and Mr Taylor, I consider those concerns have been resolved and the proposal will achieve consistency with, and give effect to, the NPS-FM.
- 105 I agree with Mr Boyes that the rule requirements in the NES-F can be determined at the time of any construction or site development and these are not a barrier to the proposed rezoning.

National Environmental Standard for Assessing and Managing Contaminations in Soil to Protect Human Health (NESCO)

- 106 I agree with the Officer that the NESCO does not strictly apply to plan change requests and the requirements of the NESCO will be appropriately addressed at the time of subdivision consent.

Canterbury Regional Policy Statement (CRPS)

- 107 I agree with the Officer as to the relevant provisions in the CRPS and the key issues in respect of those provisions.
- 108 Notably, we are in agreement that the proposal is contrary to those provisions which direct where urban growth is to be located, albeit Policy 8 of the NPS-UD overcomes this conflict and allows for responsive decision making, subject to meeting Policy 1, which I have addressed above.
- 109 To the extent that the Officer considers conflict or tension exists with other CRPS provisions, this largely reflects their concerns regarding the resolution of issues/effects, which I consider have been resolved through the evidence referred to in paragraph 10 and in the amendments made to the proposal, as set out in **Table 1** of my evidence. However, for the CRPS provisions referred to by the Officer, I comment as follows:

- 109.1 Objective 6.2.1 seeks a land use and infrastructure framework that achieves, as relevant, the 12 matters listed within the objective. The explanation and reasons to the objective states that '*The recognition of existing constraints in terms of natural and physical resources is a critical part of successful growth management*' and '*This objective identifies the key elements of natural and physical resources in Greater Christchurch that must be protected in order to ensure that harm to the natural environment is minimised*'. Mr Boyes identifies points, 5, 6, 9 and 11 as relevant, noting the outcomes these seek in relation to indigenous biodiversity, waterbodies, and infrastructure and his concerns regarding

these matters. Accounting for the evidence I have provided regarding these issues, I consider the proposal will achieve consistency with this objective and protect the key elements of natural and physical resources in Greater Christchurch.

109.2 Policy 6.3.3 provides direction in relation to outline development plans and based on the evidence I have provided, or relied upon, I consider the relevant matters have been addressed in the PC69 ODP. This includes provision for community facilities or schools (noting it is not possible to explicitly identify land requirements), provision for a range of transport options, and how potential adverse effects on and/or from nearby existing or designated strategic infrastructure will be avoided, remedied or appropriately mitigated.

109.3 Objective 6.2.4 seeks the integration of transport infrastructure and land use. In doing so, clauses 1-6 of the objective seek to manage network congestion; reduce dependency on private motor vehicles; reduce emissions; promote active and public transport modes; optimise the use of existing capacity within the network; and enhance transport safety. Based on Mr Fuller's evidence in regards transport matters, and the evidence of Ms Lauenstein and Mr Compton-Moen regarding connectivity, accessibility and the promotion of active transport modes, I consider the proposal is generally consistent with this objective. Similarly, the timing of development relative to roading infrastructure upgrades (as provided for in the ODP) will ensure consistency with Policy 6.3.5 to integrate land use development with infrastructure.

109.4 Mr Boyes refers to Policy 6.3.5.2.c. which refers to protecting investment in existing infrastructure. I also note policy 6.3.5.3 seeks the efficient and effective functioning of infrastructure is maintained and the ability to maintain and upgrade that infrastructure is retained. I agree that these provisions are pertinent to the Lincoln Sewage Treatment Plant, but only insofar as it is lawfully existing or reasonably envisaged to operate – as has been assessed by Ms Nieuwenhuijsen and Mr Van Kekem.

109.5 CRPS Policy 5.3.12 and Objective 15.2.1 relate to the maintenance of versatile soils and based on Ms McCusker's evidence, I consider the proposal does not conflict with these provisions.

109.6 Similarly, I rely on the evidence of Mr Veendrick, Ms Drummond and Mr Taylor to conclude that the amended proposal achieves consistency with policies 9.3.1, 9.3.2, 9.3.4

and 9.3.5 which consider ecosystems, indigenous biodiversity and water bodies.

- 110 Recognising the tension with those objectives and policies in the CRPS that are directive of greenfield growth in Greater Christchurch, and notwithstanding the resolution of this by the NPS-UD, I have considered the Environmental Results Anticipated by Chapter 6 of the CRPS. A brief assessment of these Results is set out in **Attachment 3** to this evidence and based on that assessment I consider the proposal will be generally consistent with the key *outcomes* sought by Chapter 6 of the CRPS in respect of urban growth.
- 111 Accounting for the full assessment of CRPS provisions in the Application, the Officer's assessment and on the basis that the tensions above they have identified have been addressed through amendments to the proposal and in my preceding evidence, I consider the proposal gives effect to the CRPS.

Our Space

- 112 I agree with the Officer that *'the matters raised by Our Space are effectively the same as those discussed above in relation to the CRPS and those relating to growth pattern and capacity are potentially removed by the finding of PC69 in terms of Policies 1 and 8 of the NPS-UD'*. This includes matters relating to infrastructure provision, timing and funding which I consider are resolved based on the evidence referred to in paragraph 10 and the amendments to the ODP which stipulate the infrastructure improvements required for the development.

Canterbury Land and Water Regional Plan (LWRP) and Canterbury Air Regional Plan (CARP)

- 113 Accounting for the amendments to the ODP and the evidence of Mr Veendrick, Ms Drummond and Mr Taylor, I consider the proposal will achieve consistency with, and give effect to, the relevant policies within the LWRP. I otherwise agree with the Officer that the requirements under these regional plans can be further considered at the time of detailed development and the necessary consents obtained.

Mahaanui Iwi Management Plan (IMP)

- 114 The Officer's concerns in regards to the scope of the ODP have been addressed by the amendments set out in **Attachment 1** and the corresponding evidence of Mr Veendrick, Ms Drummond and Mr Taylor in regards to the protection and enhancement of water bodies. Accordingly, the recommendations made by Mahaanui

Kurataiao Ltd are adequately provided for (in terms of assessment and application) at the subdivision consent stage.

Lincoln Structure Plan (LSP)

- 115 The LSP was released in May 2008 and as stated in section 1.3 had its boundaries coincided with the Urban Limits in Proposed Change 1 of the Regional Policy Statement (RPS PC1). Accounting for this, the Structure Plan did not consider the potential for growth across the PC69 site, albeit this area was included in the study area.
- 116 Notably, the constraints to growth identified in section 4.0 of the LSP that apply to the subject land have been resolved for the proposal. Specifically, the high water table/flood area at the eastern end of the site is not proposed to be developed for residential purposes, and the appropriateness of development in the vicinity of the WWTP has been assessed.
- 117 I also consider that the principles for growth and development and the key features identified on the Lincoln Structure Plan (Figure 5.2) in the vicinity of the PC69 site (e.g. transport and cycle links, wetland systems, drainage paths) are compatible and consistent with that proposed in PC69. Ms Lauenstein's evidence elaborates on this and how the PC69 proposal fits within the overall direction of growth initiated by the LSP.
- 118 In summary, noting the above and the evidence of Ms Lauenstein and Mr Compton-Moen, I consider the proposal to be generally consistent with the principles in the Structure Plan to the extent that it remains relevant and weight is afforded to it.

CONSIDERATION OF ALTERNATIVES, COSTS AND BENEFITS.

Extent to which the Objectives of the Proposal are the Most Appropriate Way to Achieve the Purpose of the Act

Section 32

Part 2 of the Act

- 119 In considering the appropriateness of the proposal in achieving the purpose of the Act, logically, the conclusions as to consistency with the relevant matters in section 6 and 7 of the Act follows the findings on the relevant issues and effects.
- 120 Accordingly, the tensions identified in the Officer's report with Part 2 matters have been resolved in my view, accounting for the preceding evidence and the amendments to the ODP. Specifically, I consider the matters in s6(a), (d), (e), (f) and (h) are relevant and the evidence confirms that they will be appropriately recognised

provided for. Further, I consider that particular regard should be (and has been) given to the matters in s7(b), (c), (d), (f), (g), and (i) and the evidence and ODP amendments confirm that such matters have been appropriately addressed.

NPS-UD and CRPS

- 121 As already addressed in this evidence, I consider the Request will give effect to both the NPS-UD and CRPS.

Selwyn District Plan

- 122 The Officer's Report records general agreement with the assessment of relevant objectives and policies in the District Plan accompanying the Request. Where that is not the case, again this relates to the outstanding issues, which have been addressed earlier in this evidence. Insofar that the Officer discusses such tensions, I comment on these as follows:

122.1 Objective B4.3.4 seeks integration of transport infrastructure and new residential land use development. Accepting that this proposal is out of sequence and unanticipated and therefore seeks responsive provision of infrastructure, the pre-requisites for infrastructure upgrades to development set out in the ODP ensure that a 'coordinated and phased approach' is still adopted, as sought by the objective.

122.2 Policy B1.1.8 seeks to 'avoid' the rezoning of land which contains versatile soils for new residential development, if the land is appropriate for other activities; and there are alternative areas which are suitable for development that do not contain versatile soils. Based on Ms McCusker's evidence, I consider the proposal will not conflict with this policy.

122.3 Objective B3.4.3 and Policy B2.2.5 are concerned with potential reverse sensitivity effects and my evidence has addressed why the proposal will not conflict with these provisions.

122.4 Objective B3.4.4 seeks that the growth of townships achieves a compact urban form. Any growth on the edge of existing townships will naturally extend existing urban form, so in that context I do not consider the objective precludes extensions of the nature proposed. In my view, a compact form is achieved through the proposed zoning and density and the extent of the PC69 area *along* (rather than *out* from) the existing township boundary. Ms Lauenstein's evidence also addresses this matter with similar conclusions.

122.5 Objective B.3.4.5 seeks that urban growth provide a high level of connectivity within the development and with adjoining land areas and will provide suitable access to a variety of forms of transport. Paragraph 70 of my evidence addresses why I consider this will be achieved.

123 Overall, I consider that the proposal, as amended, is the most appropriate way to achieve the purpose of the Act. In reaching this conclusion, I have referred also to the Ministry for Environment guide to Section 32 of the RMA, which references case law confirming that “most appropriate” is interpreted by case law as meaning “suitable, but not necessarily superior”.

124 There is no specific requirement to consider a plan change against the proposed Selwyn District Plan (pSDP) and as the relevant provisions are currently being heard and are subject to change, little if any weight could be afforded to them in any event. To the extent that the pSDP does not provide an Urban Growth overlay for the site or Lincoln generally (consistent with the CRPS and Our Space) and otherwise has provisions relating to versatile soils, such matters have been canvassed earlier in my evidence.

Whether the Provisions are the Most Appropriate Way to Achieve the Objectives

125 In terms of the appropriateness of the provisions at achieving the objectives of the proposal and the existing Plan objectives, the Officer identifies concerns that require resolution in paragraph 296 of their report. To the extent that amendments to the Proposal have been made in response, or are considered unnecessary, this is summarised in paragraph 18 and **Table 1** of my evidence. The proposed amendments to the Proposal, in the form of an amended ODP, are set out in detail in **Attachment 1** of this evidence.

CONCLUSIONS

126 In summary, I share the Officer’s view that *‘In terms of the proposal’s inconsistency with Objective B4.3.3/Policy 4.3.1 of the District Plan and various provisions within the CRPS/Our Space that direct the location of growth, ... this is outweighed by the significance of the development capacity provided by the proposal’*²⁶ and the corresponding provisions in the NPS-UD.

127 I also agree with the Officer’s view that *‘before being able to rely on Policy 8 of the NPS-UD, PC69 must also demonstrate that it contributes to well-functioning urban environments (as defined by Policy 1 of the NPS-UD)’*²⁷. To the extent that the officer concludes

²⁶ Officer’s report, paragraph 294.

²⁷ Officer’s report, paragraph 295.

that this requirement may not be achieved for the reasons they express in paragraph 296 (a)-(n), such matters in summary relate to:

127.1 Flooding and stormwater management;

127.2 Site hydrology and the proposal's effects on water bodies, freshwater ecosystems and associated ecological values;

127.3 Potential reverse sensitivity effects, associated with the establishment of dwellings within 150m of the former wastewater storage pond;

127.4 Transport related effects; and

127.5 Urban form and connectivity, particularly in terms of connectivity to and through adjacent land to the north of the PC69 site.

- 128 I consider such matters have been addressed in the evidence provided by the experts referred to in paragraph 10 above and in the resulting amendments to the ODP (and associated ODP text).
- 129 As set out in paragraph 18 and **Table 1**, I consider that the relevant outstanding issues (including those raised in submissions) which are summarised in paragraph 296 of Mr Boyes evidence have been addressed through amendments to the proposal.
- 130 On this basis, I consider that the adverse effects of the proposal can or will be avoided, remedied or mitigated to an acceptable standard and the proposal will contribute to well-functioning urban environments.
- 131 For the same reason, I also consider that the proposal will give effect to the NPS-UD (and NPS-FM) and give effect to the CRPS and achieve consistency with the operative District Plan (except for those directive provisions regarding urban growth which are resolved by Policy 8 of the NPS-UD). I do not consider the proposal will result in any significant conflict with other relevant statutory or non-statutory documents or plans as referred to in the Plan Change request or the Officer's report.
- 132 Overall therefore, I consider that the Proposal is the most appropriate way of achieving the purpose of the Act, and that the purpose of the Act is achieved.
- 133 On the basis of the views expressed above, I consider the Plan Change should be approved.

Dated: 4 November 2021

A handwritten signature in blue ink, appearing to be 'JP', written above a horizontal line.

Jeremy Phillips

**ATTACHMENT 1: PROPOSED PLAN PROVISIONS FOR PC69 – AS
AMENDED BY EVIDENCE**

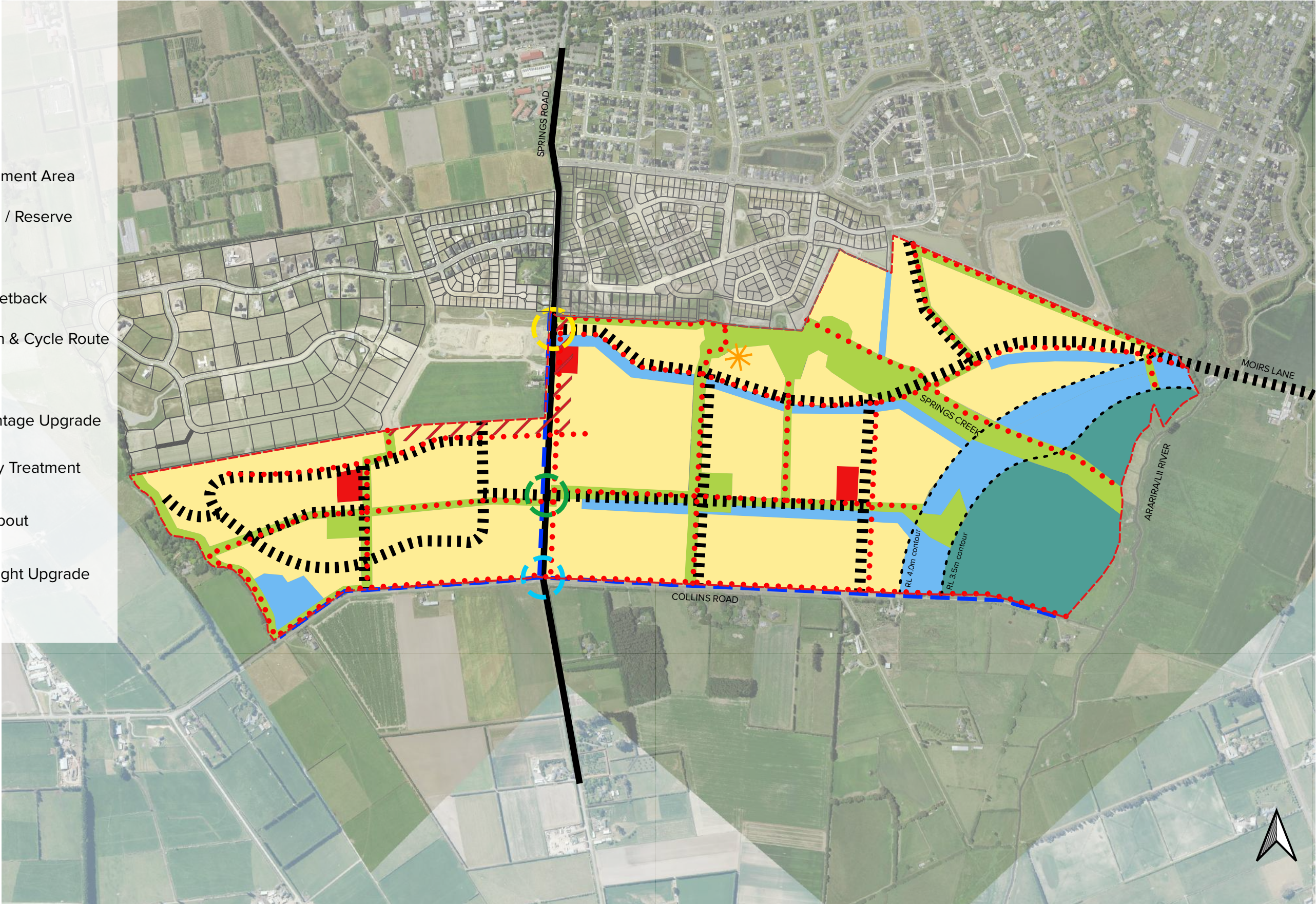
1. As amended in response to evidence, Proposed Plan Change 69 seeks the following changes to the Selwyn District Plan. Key changes relative to that sought in PC69 as notified are noted in italics.
 1. To amend the Selwyn District Plan Planning Maps, by rezoning the entirety of the PC69 site Living Z, except for the three (no.) Business 1 zones. *[The Living X zone is no longer proposed]*.
 2. To amend Township Volume, Appendix 37 Outline Development Plan- Lincoln by adding the proposed Lincoln South ODP (below). *[The ODP layer diagrams are proposed to be deleted]*.
 3. *[The proposed amendments to Rule 4.1.1 are no longer proposed and are to be deleted]*.
 4. To amend Rule 4.9.32 (Township Volume) as follows (amended text is underlined):

4.9.32 Any dwelling in the Living 1A and Living Z Zone at Lincoln shall be setback not less than 150 metres from the boundary of the area designated for the Lincoln Sewage Treatment Plant, as identified on Planning Maps 122 and 123, except that this rule shall not apply to the Living Z Zone within the Lincoln South ODP area.
 5. Any other consequential amendments including but not limited to renumbering of clauses.

OUTLINE DEVELOPMENT PLAN (ODP) - LINCOLN SOUTH

LEGEND

- ODP Boundary
- Business 1 Zone
- Reserve
- Stormwater Management Area
- Stormwater Wetland / Reserve
- Living Z Zone
- Business 2B Zone Setback
- Indicative Pedestrian & Cycle Route
- Indicative Road
- Indicative Road Frontage Upgrade
- Indicative Gateway Treatment
- Indicative Roundabout
- Indicative Traffic Light Upgrade
- Heritage Setting



OUTLINE DEVELOPMENT PLAN – SOUTH LINCOLN

Introduction

The Outline Development Plan (ODP) area comprises approximately 190 hectares and is bounded by the Te Whariki and Verdecos subdivisions to the north, Collins Road to the south, an ephemeral waterway termed Western Boundary Drain to the west, and the LII River to the east.

Land Use

The development area shall achieve a minimum net density of 12 household per hectare, averaged over the area. The zoning framework supports a variety of site sizes to achieve this minimum density requirement. Should this area be developed in stages, confirmation at the time of subdivision of each stage, and an assessment as to how the minimum net density of 12 household per hectare for the overall area can be achieved, will be required.

Medium density areas within the development area are able to be supported by adjacent amenities that include key open spaces, green corridors, waterbodies, and the small commercial centres.

For the Chudleigh Homestead and its immediate surrounds, a larger site size that accounts for the heritage values and setting associated with this building shall be provided for at the time of subdivision.

The spatial extent of the stormwater management area and Living Z zone identified on the ODP is defined by the RL 3.5m and 4.0m contours respectively (New Zealand Vertical Datum 2016 (NZVD2016)).

A dwelling setback of 50m from dwellings to the boundary of the neighbouring Business 2B Zone is provided to avoid potential reverse sensitivity effects associated with activities in that zone.

The 33kV overhead powerlines along the eastern side of Springs Road may affect direct vehicle access and can be addressed at the time of subdivision accounting for the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP 34:2001).

Three small local commercial centres are proposed: on Springs Road towards the northern part of the ODP area in a location that complements the nearby Business 2B Zone; and in the eastern and western parts of the ODP area. These centres will provide good accessibility and help to meet some of the convenience needs of residents in the immediate area.

Access and Transport

The ODP employs a roading hierarchy that delivers a range of integrated transport options, including active transport connections at the boundary of the development area to adjacent neighbourhoods that facilitate the use of existing and future public transport routes. Roading connections shall be designed to achieve permeability, whilst minimising the number of new intersections and maintaining appropriate intersection spacing. The proposed roading hierarchy will deliver an accessible and coherent neighbourhood that provides safe and efficient access to the new development and can cater for extensions to existing public transport routes and/or new routes.

An integrated network of roads will facilitate the safe and efficient distribution of internal traffic, provide access to properties, assist in connecting the open space reserves network both within and beyond the site and provide an opportunity for road links to adjoining neighbourhoods.

The transport network for the area shall integrate into the pedestrian and cycle network established in adjoining neighbourhoods and the wider township. Cycling and walking will be contained within the road reserve and incorporated into the roading design of the overall road network where applicable. Adequate space must be provided to accommodate cyclists and to facilitate safe and convenient pedestrian movements.

The ODP identifies the requirement for frontage upgrades for Springs Road and Collins Road; and a new roundabout and traffic signals on the connection points from the ODP area to Springs Road.

No dwellings shall be occupied across the area prior to the completion of the upgrade of the Springs Road / Gerald Street / Ellesmere Junction Road intersection.

No more than 1586 dwellings shall be occupied prior to the connection to Ellesmere Road (via Moirs Lane) being constructed. The connection to Ellesmere Road (via Moirs Lane) will only be constructed once the upgrades to the Edward Street / Ellesmere Road / Lincoln Tai Tapu Road intersection and widening of Ellesmere Road (between Moirs Land and Knights Stream Bridge) are completed.

A consent notice or similar mechanism shall be imposed at the time of any subdivision consent to ensure these outcomes.

Open Space, Recreation, Community and Educational Facilities

Recreation reserves are provided throughout the ODP area in addition to green links and reserves that provide open space and facilitate attractive pedestrian connections. The location of these reserves has been determined based on the number of reserves established in the wider area and to ensure people living within the development block have access to open space reserve is within a 500m walking radius of their homes.

There is an opportunity to integrate the collection, treatment, and disposal of stormwater with open space reserves where appropriate. Pedestrian and cycle paths are required to integrate into the green network to ensure a high level of connectivity is achieved, and to maximise the utility of the public space. Council's open space requirements cited in the Long Term Plan and Activity Management Plans should be adhered to during subdivision design.

An approximate 20m wide recreation reserve with possible pervious cycleway and riparian planting is provided along Springs Creek and provides connectivity to the Te Whariki subdivision and its existing green links through recreation / local purpose (utility) reserves.

The proposed reserve network provides an opportunity to create an ecological corridor. Plant selection in the new reserves and riparian margins will include native tree and shrub plantings. Reserves will ensure that dwellings are setback an appropriate distance from waterbodies.

The provision of new educational facilities can be provided within the block or in the wider area albeit subject to a needs assessment.

Water Bodies and Freshwater Ecosystems

Springs Creek is a spring fed tributary of the Ararira/LII River with headwater springs situated within the grounds of the historic 'Chudleigh' homestead. The creek alignment has been modified over time to straighten the channel and improve its drainage function, however development of the ODP area provides potential for higher ecological values to be re-established at the site through restoration and enhancement. This could include protected reserve space, native planting, naturalisation and instream enhancement of the spring-fed drains within the site and increased biodiversity connections within the wider catchment. Development shall protect and enhance this natural feature and other water bodies and freshwater ecosystems within the ODP area and incorporate these features into the wider green and blue network of the site.

In terms of specific measures to be addressed at the time of subdivision in order to protect and enhance fresh water values and ecosystems, development within the ODP area shall:

- a. Include an assessment by a suitably qualified and experienced practitioner that:
 - i. Provides the results of detailed groundwater level investigations across the site; and,

- ii. Specifies construction measures to ensure that shallow groundwater is not diverted away from its natural flow path for those areas where the shallow groundwater is likely to be intercepted by service trenches and hardfill areas.
- b. Be in accordance with an Ecological Management Plan prepared by a suitably qualified and experienced practitioner that, as a minimum, includes:
 - i. Wetland delineation in accordance with Ministry for the Environment 2020. Wetland delineation protocols (Ministry for the Environment, Wellington. No. 10 p) and associated buffer distances to be implemented.
 - ii. Plans specifying spring head restoration, Springs Creek riparian management, waterway crossing management and wetland restoration and enhancement options within the proposed reserve spaces, segregation of spring water and untreated stormwater, .
 - iii. Aquatic buffer distances, including minimum waterbody setbacks for earthworks and buildings of:
 - i. 20m from Springs Creek.
 - ii. 30m from permanent springheads.
 - iii. 10m from channelized waterways.
 - iv. Ongoing maintenance and monitoring requirements that are to be implemented.
- c. Provide for naturalisation of the diversion of the Lincoln Main Drain.

Consent conditions (which may include consent notices or similar mechanisms) shall be imposed at the time of any subdivision consent to ensure these outcomes.

Servicing

Detailed stormwater solutions are to be determined by the developer in collaboration with Council at subdivision stage and in accordance with Environment Canterbury requirements. This will require appropriate modelling to show that effects of flooding can be appropriately mitigated.

Development within the ODP area shall be designed to account for the effects of floodplain filling and this may dictate subdivision construction methodology and minimum floor levels and mitigation to avoid effects from floodwater on third parties.

The spring-fed Lincoln Main Drain (LMD) crosses the northeast portion of the site from northwest to southeast and serves as the main drain outlet for the Te Whariki subdivision. The drain is to be diverted to the northern boundary of the development site, but detailed design will ensure its ongoing function is not compromised. There is opportunity to naturalise and enhance the LMD as part of the wider green and blue network of the site and this shall be addressed in the Ecological Management Plan referred to above.

Stormwater management systems will otherwise be designed to integrate into both the transport and reserve networks where practicable.

The provision of infrastructure to service the area shall align with the Council's indicative infrastructure staging plan, unless an alternative arrangement is made by the landowner/developer and approved by Council.

Cultural

The importance of natural surface waterbodies and springs to Manawhenua is recognised and provided for by the ODP and the specific measures described above in regards to water bodies and freshwater ecosystems that will support cultural values associated with the ODP area.

For all earthworks across the site, an Accidental Discovery Protocol will be implemented at the time of site development, in addition to appropriate erosion and sediment controls, to assist in mitigating against the potential effects on wahi tapu and wahi taonga values generally.

OUTLINE DEVELOPMENT PLAN – SOUTH LINCOLN

[Tracked Changes]

Introduction

The Outline Development Plan (ODP) area comprises approximately 190 hectares and is bounded by the Te Whariki and Verdecos subdivisions to the north, Collins Road to the south, an ephemeral waterway termed Western Boundary Drain to the west, and the LII River to the east.

Land Use

The development area shall achieve a minimum net density of 12 household per hectare, averaged over the area. The zoning framework supports a variety of site sizes to achieve this minimum density requirement. Should this area be developed in stages, confirmation at the time of subdivision of each stage, and an assessment as to how the minimum net density of 12 household per hectare for the overall area can be achieved, will be required.

Medium density areas within the development area are able to be supported by adjacent amenities that include key open spaces, green corridors, waterbodies, and the a small commercial centres.

For the Chudleigh Homestead and its immediate surrounds, a larger site size that accounts for the heritage values and setting associated with this building shall be provided for at the time of subdivision.

~~A low density area of Living X zoning is located on the eastern extent of the ODP, with a minimum lot area of 2,000m². This low density area will provide a buffer between the higher density residential areas located centrally within the ODP area, and the adjoining rural areas to the east, and will otherwise meet stormwater objectives for the site. The spatial extent of the stormwater management area and Living Z zone identified on the ODP is defined by the RL 3.5m and 4.0m contours respectively (New Zealand Vertical Datum 2016 (NZVD2016)).~~

A dwelling setback of 50m from dwellings to the boundary of the neighbouring Business 2B Zone is provided to avoid potential reverse sensitivity effects associated with activities in that zone.

The 33kV overhead powerlines along the eastern side of Springs Road may affect direct vehicle access and can be addressed at the time of subdivision accounting for the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP 34:2001).

~~Thre~~ re small local commercial centre are is ~~proposed~~ on Springs Road towards the northern part of the ODP area in a location that complements the nearby Business 2B Zone; and in the eastern and western parts of the ODP area. These centres will provide ~~provides~~ good accessibility and will help to ~~will~~ meet some of the convenience needs of residents in the immediate area.

Access and Transport

The ODP employs a roading hierarchy that delivers a range of integrated transport options, including active transport connections at the boundary of the development area to adjacent neighbourhoods that facilitate the use of existing and future public transport routes. Roading connections shall be designed to achieve permeability, whilst minimising the number of new intersections and maintaining appropriate intersection spacing. The proposed roading hierarchy will deliver an accessible and coherent neighbourhood that provides safe and efficient access to the new development and can cater for extensions to existing public transport routes and/or new routes.

An integrated network of roads will facilitate the safe and efficient distribution of internal traffic, provide access to properties, assist in connecting the open space reserves network both within and beyond the site and provide an opportunity for road links to adjoining neighbourhoods.

The transport network for the area shall integrate into the pedestrian and cycle network established in adjoining neighbourhoods and the wider township. Cycling and walking will be contained within the road reserve and incorporated into the roading design of the overall road network where applicable. Adequate space must be provided to accommodate cyclists and to facilitate safe and convenient pedestrian movements.

The ODP identifies the requirement for frontage upgrades for Springs Road and Collins Road; and a new roundabout and traffic signals on the connection points from the ODP area to Springs Road.

No dwellings shall be occupied across the area prior to the completion of the upgrade of the Springs Road / Gerald Street / Ellesmere Junction Road intersection.

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A consent notice or similar mechanism shall be imposed at the time of any subdivision consent to ensure these outcomes.

Open Space, Recreation, ~~and~~ Community and Educational Facilities

Recreation reserves are provided throughout the ODP area in addition to green links and reserves that provide open space and facilitate attractive pedestrian connections. The location of these reserves has been determined based on the number of reserves established in the wider area and to ensure people living within the development block have access to open space reserve is within a 500m walking radius of their homes.

There is an opportunity to integrate the collection, treatment, and disposal of stormwater with open space reserves where appropriate. Pedestrian and cycle paths are required to integrate into the green network to ensure a high level of connectivity is achieved, and to maximise the utility of the public space. Council's open space requirements cited in the Long Term Plan and Activity Management Plans should be adhered to during subdivision design.

~~Springs Creek is a spring fed tributary of the Ararira/LII River with headwater springs situated within the grounds of the historic 'Chudleigh' homestead. The creek alignment has been modified over time to straighten the channel and improve its drainage function. There is opportunity to enhance and incorporate this natural feature into the wider green and blue network of the site.~~

An approximate 20m wide recreation reserve with possible pervious cycleway and riparian planting is provided along Springs Creek and provides connectivity to the Te Whariki subdivision and its existing green links through recreation / local purpose (utility) reserves.

The proposed reserve network provides an opportunity to create an ecological corridor. Plant selection in the new reserves and riparian margins will include native tree and shrub plantings. Reserves will ensure that dwellings are setback an appropriate distance from waterbodies.

The provision of new educational facilities can be provided within the block or in the wider area albeit subject to a needs assessment.

Water Bodies and Freshwater Ecosystems

Springs Creek is a spring fed tributary of the Ararira/LII River with headwater springs situated within the grounds of the historic 'Chudleigh' homestead. The creek alignment has been modified over time to straighten the channel and improve its drainage function, however development of the ODP area provides potential for higher ecological values to be re-established at the site through restoration and enhancement. This could include protected reserve space, native planting, naturalisation and instream enhancement of the spring-fed drains within the site and increased biodiversity connections within the wider catchment. Development shall protect and enhance this natural feature and other water bodies and freshwater ecosystems within the ODP area and incorporate these features into the wider green and blue network of the site.

In terms of specific measures to be addressed at the time of subdivision in order to protect and enhance fresh water values and ecosystems, development within the ODP area shall:

- a. Include an assessment by a suitably qualified and experienced practitioner that:
 - i. Provides the results of detailed groundwater level investigations across the site; and,
 - ii. Specifies construction measures to ensure that shallow groundwater is not diverted away from its natural flow path for those areas where the shallow groundwater is likely to be intercepted by service trenches and hardfill areas.
- b. Be in accordance with an Ecological Management Plan prepared by a suitably qualified and experienced practitioner that, as a minimum, includes:
 - i. Wetland delineation in accordance with Ministry for the Environment 2020. Wetland delineation protocols (Ministry for the Environment, Wellington. No. 10 p) and associated buffer distances to be implemented.
 - ii. Plans specifying spring head restoration, Springs Creek riparian management, waterway crossing management and wetland restoration and enhancement options within the proposed reserve spaces, segregation of spring water and untreated stormwater, .
 - iii. Aquatic buffer distances, including minimum waterbody setbacks for earthworks and buildings of:
 - i. 20m from Springs Creek.
 - ii. 30m from permanent springheads.
 - iii. 10m from channelized waterways.
 - iv. Ongoing maintenance and monitoring requirements that are to be implemented.
- c. Provide for naturalisation of the diversion of the Lincoln Main Drain.

Consent conditions (which may include consent notices or similar mechanisms) shall be imposed at the time of any subdivision consent to ensure these outcomes.

Servicing

There are a range of options available for the collection, treatment, and disposal of stormwater. Detailed stormwater solutions are to be determined by the developer in collaboration with Council at subdivision stage and in accordance with Environment Canterbury requirements. This will require appropriate modelling to show that effects of flooding can be appropriately mitigated.

Development within the ODP area shall be designed to account for the effects of floodplain filling and this may dictate subdivision construction methodology and minimum floor levels and mitigation to avoid effects from floodwater on third parties.

The spring-fed Lincoln Main Drain (LMD) crosses the northeast portion of the site from northwest to southeast and serves as the main drain outlet for the Te Whariki subdivision. The drain is to be diverted to the northern boundary of the development site, but detailed design will ensure its ongoing function is not compromised. There is opportunity to naturalise and enhance the LMD as part of the wider green and blue network of the site and this shall be addressed in the Ecological Management Plan referred to above.

Stormwater management systems will otherwise be designed to integrate into both the transport and reserve networks where practicable.

The provision of infrastructure to service the area shall align with the Council's indicative infrastructure staging plan, unless an alternative arrangement is made by the landowner/developer and approved by Council.

Cultural

The importance of natural surface waterbodies and springs to Manawhenua is recognised and provided for by the ODP and the specific measures described above in regards to water bodies and freshwater ecosystems that ~~Measures such as a 10 metre waterbody setback for development, the naturalisation of waterway margins with indigenous planting, and increased riparian margins~~ will support cultural values associated with the ODP area.

For all earthworks across the site, an Accidental Discovery Protocol will be implemented at the time of site development, in addition to appropriate erosion and sediment controls, to assist in mitigating against the potential effects on wahi tapu and wahi taonga values generally.

ATTACHMENT 2: NPS-UD ASSESSMENT

NPS-UD Provision	Analysis
<p><i>Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.</i></p>	<p>The proposed Plan Change supports this objective, through delivery of a well-functioning urban environment (within the context of the subject land, and within the wider Lincoln and Greater Christchurch context)- as is set out in respect of policy 1 below. The enablement of up to 2000 households will clearly ‘enable’ people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, through enhanced housing supply and choice, without diminishing these outcomes for other people and communities.</p>
<p><i>Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.</i></p>	<p>As noted in the economic evidence, the proposed Plan Change will help address constraints in the residential land supply markets, increase supply and competition, and help address housing affordability within the Selwyn District and Greater Christchurch in a manner consistent with Objective 2.</p>
<p><i>Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:</i></p> <ul style="list-style-type: none"> <i>a. the area is in or near a centre zone or other area with many employment opportunities</i> <i>b. the area is well-served by existing or planned public transport</i> <i>c. there is high demand for housing or for business land in the area, relative to other areas within the urban environment.</i> 	<p>This objective supports enablement of residential growth in this location, noting the subject land is</p> <ul style="list-style-type: none"> a. near an area with many employment opportunities (Lincoln township, the established and developing Rolleston town and industrial centres, rural Canterbury, and Christchurch city). b. not well-served by existing public transport or planned public transport presently (noting this is contingent on a residential population that can sustain it), but proposes road networks and connections that would enable existing/nearby bus services to route through the sites. c. in an area where there is high demand for housing, relative to other areas within the urban environment, as evident from the evidence of Mr Jones and Mr Sellars. <p>I note that this objective only requires one of (a)-(c) to apply.</p>
<p><i>Objective 4: New Zealand’s urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.</i></p>	<p>The proposed change from rural to urban residential is in response to the diverse and changing needs of people, communities, and future generations (for the proposed form/density of housing in this location) in a manner consistent with this objective.</p> <p>At a broader scale, the same can be said for the rapid and continuing growth of Lincoln within a Greater Christchurch context, which is evidently occurring ‘in response to the diverse and changing needs of people’ choosing this location over alternative locations or housing types.</p>
<p><i>Objective 6: Local authority decisions on urban development that affect urban environments are:</i></p> <ul style="list-style-type: none"> <i>a. integrated with infrastructure planning and funding decisions; and</i> <i>b. strategic over the medium term and long term; and</i> <i>c. responsive, particularly in relation to proposals that would supply significant development capacity.</i> 	<p>The infrastructure and transport evidence has demonstrated that the proposal can be effectively integrated with infrastructure planning, funding and delivery.</p> <p>The proposal would clearly ‘supply significant development capacity’, and on that basis this objective seeks ‘responsive’ decision making. This creates some tension with the requirement to be strategic over a medium and long term, however given the attributes of the site, the absence of any significant effects or risks, and the adjacency to the existing urban area, it is considered that enablement of this proposal would not be inconsistent with this aspect of the objective.</p>

Objective 8: New Zealand's urban environments:

- a. *support reductions in greenhouse gas emissions; and*
- b. *are resilient to the current and future effects of climate change.*

The proposed provision for alternative transport modes, connectivity and accessibility, and the potential for servicing by public transport 'supports' reductions in greenhouse gas emissions. Notably, the objective seeks to 'support reductions', rather than strictly seek to 'reduce' or 'require reductions'. Noting this distinction I consider the proposed measures described above will 'support' the reductions sought by the objective.

Whilst not Court decisions, I note similar conclusions were reached in similar circumstances by the Expert Consenting Panel for the Faringdon South West and South East Resource Consents²⁸ and by the Hearings Commissioners determining the Ohinewai Rezoning (APL/Sleepyhead)²⁹.

Resilience to climate change is achieved through the layout of the site and the exclusion of residential development from low lying areas that are potentially susceptible to the impacts of sea-level rise and storm surges.

Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:

- a. *have or enable a variety of homes that:*
 - (i) *meet the needs, in terms of type, price, and location, of different households; and*
 - (ii) *enable Māori to express their cultural traditions and norms; and*
- b. *have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and*
- c. *have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and*
- d. *support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and*
- e. *support reductions in greenhouse gas emissions; and*
- f. *are resilient to the likely current and future effects of climate change.*

The proposal will contribute to well-functioning urban environments at a localised, township, and regional scale, noting it will, as a minimum:

a. Have and enable a variety of homes that meet the needs, in terms of type, price, and location, of different households. This is achieved through the Living Z provisions which provide for this variety and the choice afforded through the supply of up to 2,000 households - including a variety of homes, needs, types, price-points and locations within the plan change area, within Lincoln and within the Greater Christchurch market generally.

Within the plan change area the proposed Living Z zoning provides for a variety in residential densities, including Low Density (average allotment size of 600m² and a minimum individual allotment size of 500m²), Medium Density Small-lot (maximum average of 500m², with minimum of 400m²), and Medium Density Comprehensive (maximum average of 350m², with no minimum site size) with the higher density (15hh/Ha) residential areas located adjacent to key open spaces and green corridors. On the ground, the low and medium density areas will provide for conventional standalone houses and sites, potentially for larger families. In contrast, the medium density comprehensive areas will provide for comprehensively designed and developed housing that offers smaller and more affordable housing, through terraced, multi-unit or smaller scale apartment styled developments or through other comprehensive housing forms (such as retirement housing, social housing, or sheltered/supportive housing). Of note, the proposal enables this variety in housing, but other than by way of adopting existing density rules in the Plan, it does not specifically prescribe them.

²⁸ See Record of decision, 27/8/21 paragraphs 121-22 and 144 (https://www.epa.govt.nz/assets/Uploads/Documents/Fast-track-consenting/Faringdon/Decision_Faringdon-FINAL_27-Aug-21.pdf)

²⁹ See Report and Decisions of the Waikato District Plan, Report 2, 24/5/21 paragraphs 314-315 (https://wdcsitefinity.blob.core.windows.net/sitefinity-storage/docs/default-source/your-council/plans-policies-and-bylaws/plans/district-plan-review/decisions/ohinewai-hearing/decision-documents/ohinewai-zone-decision-report-24-may-2021.pdf?sfvrsn=561291c9_2).

The proposal will otherwise enable Māori to express their cultural traditions and norms, to the extent relevant to the site context.

b. Provide access to suitably located and sized business sectors. Local retail facilities are proposed for residents within the Plan Change site; the Lincoln town centre and university is accessible by various transport modes; and the wider offerings of Rolleston and Christchurch city are accessible where required.

c. Provide good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport noting the preceding point and the findings in the transport assessment. Notably, clause c. does not specify what form the accessibility should take, it simply seeks good accessibility for all people. In this context, the site has very good accessibility given: its proximity to the Springs Road arterial route, the local roading network; the provision for alternative transport modes; the varied densities, commercial centres, green links and reserves, and proximity to schooling; and 'including [good accessibility options] by way of public or active transport'. Again, equivalent conclusions were reached in paragraph 312 of the Ohinewai Rezoning.

d. Support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets.

e. Support reductions in greenhouse gas emissions, through provision for alternative transport modes, connectivity and accessibility, and the potential for servicing by public transport. (See Objective 8 above).

f. Achieve resilience to the likely current and future effects of climate change, as described above.

Policy 2: Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.

In order to be sufficient to meet expected demand for housing, development capacity must be: 'plan-enabled (see clause 3.4(1)); and infrastructure-ready (see clause 3.4(3)); and feasible and reasonably expected to be realised (see clause 3.26); and meet the expected demand plus the appropriate competitiveness margin (see clause 3.22)'. Moreover, Policy 2 requires sufficient development capacity is provided 'at all times' to 'at least' meet expected demand over the short term, medium term, and long term.

Based on the economic evidence, the Council is not meeting the requirements of Policy 2 to provide sufficient housing capacity.

The proposed enablement of up to 2,000 households that can be readily serviced with infrastructure would be consistent with this policy (insofar that it enables more than what would be sufficient), would enhance Council's compliance with this policy, and would clearly not be inconsistent with the policy.

Policy 3: In relation to tier 1 urban environments, regional policy statements and district plans enable:

(a) in city centre zones, building heights and density of urban form to realise as much development capacity as possible, to maximise benefits of intensification; and

(b) in metropolitan centre zones, building heights and density of urban form to reflect demand for housing and business use in those locations, and in all cases building heights of at least 6 storeys; and

(c) ...in all other locations in the tier 1 urban environment, building heights and density of urban form commensurate with the greater of:

(i) the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services; or

(ii) relative demand for housing and business use in that location.

In respect of the proposal Policy 3 relevantly seeks that district plans 'enable' 'building heights and density of urban form commensurate with the greater of: (i) the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services; or (ii) relative demand for housing and business use in that location'. In this respect, demand for housing (as is addressed in response to NPS-UD policy 8 below and in the economic evidence) is the principal driver of the proposed density enabled by the proposed plan change.

Policy 6: When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters:

a. the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement

b. that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes:

(i) 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

(ii) are not, of themselves, an adverse effect

c. the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1)

d. any relevant contribution that will be made to meeting the requirements of this National Policy Statement to provide or realise development capacity

e. the likely current and future effects of climate change.

a. No RMA planning documents have yet given effect to this National Policy Statement in a way that can guide urban built form.

b. The assessments supporting the Plan Change request and preceding evidence concludes that the proposal will not result in any significant effects on amenity values. However, to the extent that the appreciation of the status quo by some may be diminished by the proposal, this policy recognises the potential for change and that this is not necessarily an adverse effect.

c. The proposal will deliver the benefits of urban development that are consistent with well-functioning urban environments (as described above in respect of Policy 1)

d. The proposal will clearly contribute significantly to meeting the requirements of this National Policy Statement 'to provide or realise development capacity'.

e. As set out above for other NPS-UD objectives and policies, the proposal accounts for the likely current and future effects of climate change.

Policy 8: Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is:

- a. unanticipated by RMA planning documents; or*
- b. out-of-sequence with planned land release.*

As set out above and in the economic evidence (and irrespective of the absence of criteria yet within the CRPS), the plan change will clearly add significantly to development capacity. And, as set out above, it will contribute to well-functioning urban environments. Accordingly, the policy supports a decision that is 'responsive' to the proposal, notwithstanding it being: unanticipated by RMA planning documents; or out-of-sequence with planned land release.

Clauses (a) and (b) of this policy are particularly relevant insofar that the proposal is unanticipated and/or out of sequence with land release, as contemplated by: the CRPS (including Change 1), Our Space, and/or the operative and proposed District Plans.

ATTACHMENT 3: ASSESSMENT OF CRPS ANTICIPATED ENVIRONMENTAL RESULTS FOR CHAPTER 6

Anticipated Environmental Result	Analysis
<i>1. Recovery and rebuilding is enabled within Greater Christchurch.</i>	The proposal is consistent insofar that it supports recovery and rebuilding.
<i>2. Priority areas, Future Development Areas and existing urban areas identified provide the location for all new urban development.</i>	The proposal is not consistent with this directive requirement.
<i>3. Significant natural resources are protected from inappropriate development.</i>	The proposal is consistent, noting significant natural resources will not be affected.
<i>4. People are protected from unacceptable risk from natural hazards.</i>	The proposal is consistent, noting natural hazard risks are avoided or managed to an acceptable level.
<i>5. Infrastructure, and urban and rural development, are developed in an integrated manner.</i>	The proposal is consistent, noting the evidence regarding effects on and integration with infrastructure.
<i>6. The use of existing infrastructure is optimised.</i>	The proposal is consistent, noting the evidence regarding effects on and integration with infrastructure.
<i>7. Development opportunities are provided for on Māori Reserves.</i>	Not applicable.
<i>8. Growth is provided for through both greenfield and brownfield development opportunities.</i>	Based on the economic evidence demands growth are not adequately provided for through greenfield development opportunities. The proposal therefore supports the outcome sought.
<i>9. Higher density living environments are provided.</i>	The proposal is consistent, noting the Living Z zone provides for this.
<i>10. Greenfield development is provided for at a rate that meets demand and enables the efficient provision and use of infrastructure.</i>	Based on the economic evidence demands growth are not adequately provided for through greenfield development opportunities. Noting that efficient provision and use of infrastructure can be achieved and demands will be supported, the proposal therefore supports the outcome sought.
<i>11. Growth of rural towns within Greater Christchurch is sustainable and encourages selfsufficiency.</i>	Not applicable.
<i>12. Rural residential development is appropriately managed.</i>	Not applicable
<i>13. Development incorporates good urban design.</i>	The proposal is consistent, noting the evidence of Mr Compton-Moen and Ms Lauenstein.

<i>14. Areas of special amenity, heritage value, or importance to Ngāi Tahu are retained.</i>	The proposal is consistent, noting the ODP provides for the heritage values of Chudleigh and the freshwater bodies (of importance to Ngai Tahu) are protected and enhanced.
<i>15. Residential development contains a range of densities.</i>	The proposal is consistent, noting the Living Z zone provides for this.
<i>16. Transport infrastructure appropriately manages network congestion, dependency of private vehicles is reduced, emissions and energy use from vehicles is reduced, and transport safety is enhanced.</i>	The proposal is consistent, noting the evidence of Mr Fuller.
<i>17. The function and role of the Central City, the Key Activity and neighbourhood centres is maintained.</i>	The proposal is consistent, noting Lincoln's function and role as a KAC is maintained (and supported) by the proposal.
<i>18. Sufficient business land is provided for, and different types of business activity take place in appropriate locations, adopting appropriate urban design qualities.</i>	The proposal is consistent, noting the Business 1 zone centres provided for.
<i>19. Development opportunities for a metropolitan recreation facility at 466-482 Yaldhurst Road are provided for.</i>	Not applicable
<i>20. Commercial film or video production activities are enabled to support the regional economy and provide employment opportunities.</i>	Not applicable
<i>21. Sufficient opportunities for development are provided to meet the housing and business needs of people and communities – both current and future.</i>	Based on the economic evidence, sufficient opportunities for development are not adequately provided. The proposal therefore supports the outcome sought.