

**BEFORE THE CHRISTCHURCH REPLACEMENT
DISTRICT PLAN INDEPENDENT HEARINGS PANEL**

IN THE MATTER OF The Resource Management Act
1991 and the Canterbury
Earthquake (Christchurch
Replacement District Plan) Order
2014

AND

IN THE MATTER OF The Subdivision Proposal (Chapter
8)

SUBMITTER **DANNE MORA HOLDINGS
LIMITED**
(Submitter 1134)

CLOSING SUBMISSIONS ON BEHALF OF DANNE MORA HOLDINGS LIMITED

Dated 01 July 2015

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MAY IT PLEASE THE PANEL

- 1 These submissions address the following matters:
 - (a) Whether the North Halswell ODP gives effect to CRPS 6.3.3?;
 - (b) Ring fencing the Meadowlands Exemplar Zone; and
 - (c) Density Transfer Mechanisms.

Does the North Halswell ODP give effect to CRPS Policy 6.3.3?

- 2 There does not appear to be any dispute that, certain aspects of Policy 6.3.3 excepted, the provisions of the Meadowlands Exemplar, Residential New Neighbourhood and Commercial Core Zones within the North Halswell ODP give effect to the objectives and policies of the RPS.
- 3 Policy 6.3.3 provides:

Policy 6.3.3 – Development in accordance with outline development plans

Development in greenfield priority areas and rural residential development, is to occur in accordance with the provisions set out in an outline development plan or other rules for the area. Subdivision must not proceed ahead of the incorporation of an outline development plan in a district plan. Outline development plans and associated rules will:

(1) Be prepared as:

(a) a single plan for the whole of the priority area; or

(b) where an integrated plan adopted by the territorial authority exists for the whole of the priority area and the outline development plan is consistent with the integrated plan, part of that integrated plan; or

(c) a single plan for the whole of a rural residential area; and

(2) Be prepared in accordance with the matters set out in Policy 6.3.2;

(3) To the extent relevant show proposed land uses including:

(a) Principal through roads, connections with surrounding road networks, relevant infrastructure services and areas for possible future development;

(b) Land required for community facilities or schools;

(c) Parks and other land for recreation;

(d) Land to be used for business activities;

(e) The distribution of different residential densities, in accordance with Policy 6.3.7;

(f) Land required for stormwater treatment, retention and drainage paths;

(g) Land reserved or otherwise set aside from development for environmental, historic heritage, or landscape protection or enhancement;

(h) Land reserved or otherwise set aside from development for any other reason, and the reasons for its protection from development;

(i) Pedestrian walkways, cycleways and public transport routes both within and adjoining the area to be developed;

(4) Demonstrate how Policy 6.3.7 will be achieved for residential areas within the area that is the subject of the outline development plan, including any staging;

(5) Identify significant cultural, natural or historic heritage features and values, and show how they are to be protected and/ or enhanced;

(6) Document the infrastructure required, when it will be required and how it will be funded;

(7) Set out the staging and co-ordination of subdivision and development between landowners;

(8) Demonstrate how effective provision is made for a range of transport options including public transport options and integration between transport modes, including pedestrian, cycling, public transport, freight, and private motor vehicles;

(9) Show how other potential adverse effects on and/or from nearby existing or designated strategic infrastructure (including requirements for designations, or planned infrastructure) will be avoided, remedied or appropriately mitigated;

(10) Show how other potential adverse effects on the environment, including the protection and enhancement of surface and groundwater quality, are to be avoided, remedied or mitigated;

(11) Show how the adverse effects associated with natural hazards are to be avoided, remedied or mitigated as appropriate and in accordance with Chapter 11 and any relevant guidelines; and

(12) Include any other information that is relevant to an understanding of the development and its proposed zoning.

Methods

The Regional Council:

Will

(1) Establish a protocol and guidelines to assist all parties involved in the preparation of outline development plans to ensure Policy 6.3.3 is efficiently and effectively applied.

Territorial authorities:

Will

(1) Require an outline development plan to be developed and incorporated into district plans, prior to, or at the same time as, rezoning land for urban use in greenfield priority areas.

(2) Include in district plans objectives, policies and rules (if any) to give effect to Policy 6.3.3.

Should

(4) Ensure that financial provision is made for delivery of infrastructure to greenfield priority areas for development.

Principal reasons and explanation

The use of outline development plans for residential and business greenfield development is necessary for the recovery of Greater Christchurch. They will assist with the efficient use of resources when planning land uses, provide for sustainable urban development, and ensure adequate housing supply and choice to facilitate earthquake recovery. Background information provided through the process provides the necessary background evaluation work before or at the same time as the land is rezoned. Outline development plans provide a mechanism for integrating urban development with infrastructure, making the best use of existing infrastructure, and identifying and providing for the additional infrastructure required to meet the needs of incoming residents and businesses. They also provide the mechanism for integrating new development with existing urban areas, and of achieving the type and form of development necessary to accommodate urban growth in a sustainable way. Staging may be required to allow for infrastructure upgrades, enabling parts of a development to be delivered earlier.

In addition, these plans help to provide certainty for the community, developers, network utility providers and territorial authorities, and ensure that all constraints associated with the development of an area are investigated, addressed or protected at the time of initial zoning for urban purposes. By identifying opportunities for low impact urban design and development early on in the land development process, recovery will be enabled by building new developments in a better way. [Emphasis added]

- 4 The underlined words emphasise that Policy 6.3.3 can be implemented not solely by an ODP, but also by objectives, policies and rules applying to individual ODP areas such as North Halswell. This is agreed by the signatories to the Planning Expert Conferencing Statement of 30 June 2015 (the Joint Statement)¹.
- 5 Appendix 1B to the Joint Statement provides a detailed checklist of each of the individual requirements of Policy 6.3.3 together with a description of how these are met by all of the provisions of the Residential New Neighbourhood Zone, Meadowlands Exemplar Zone and Commercial Core Zone within the NHODP area.
- 6 Adherence to Policy 6.3.3, in particular 6.3.3 (6) and (7) has been highlighted as being a somewhat problematic task, one on which there is no guidance in the form of the protocol anticipated by the Methods associated with this Policy.
- 7 To illustrate, the Explanation to Policy 6.3.6 does not elaborate on the level of detail that must be provided to satisfy the **how** in the *..how it will be funded*. This raises the question of whether or not it is sufficient to include a statement along the lines that there is an expectation the Council will be responsible for funding the upgrades to its infrastructure to enable development of Greenfield Priority Areas? In respect of North Halswell, this would be directly consistent with Method (4) to Policy 6.3.3 which directs that territorial authorities should:

(4) Ensure that financial provision is made for delivery of infrastructure to greenfield priority areas for development.
- 8 Alternatively, would a statement which refers to funding being undertaken jointly between developers/landowners and the Council, with the latter having recourse to its powers to, in particular, levy development contributions under the Local Government 2002 as a means of paying for infrastructure? A statement along the latter lines would, in all probability, more accurately reflect the reality of how development is funded.
- 9 Policy 6.3.3 (7) refers to *staging and co-ordination of subdivision and development between landowners*, with the Principal Reasons and explanation simply indicating that "staging" may be required where there are infrastructure constraints.
- 10 Beyond this, there is nothing in the Policy to explain how an ODP can provide for the co-ordination of development between landowners. In my submission, an ODP can only address this requirement at a very high level in the sense that it needs to identify what are the basic elements necessary to support development (such as road connections,

¹ Joint Planning Expert Conferencing Statement at pages 3-4.

reserves, infrastructure) and provide for these in either a fixed or indicative manner. This sets a framework to assist individual landowners in understanding how development of an ODP area is to be "rolled out" and enables them to effectively plan their future development so that it achieves consistency with the key elements of an ODP.

- 11 The above aside, it was accepted in opening submissions that a number of improvements could readily be made to the NHODP to better implement Policy 6.3.3. In particular it was accepted that further detail in respect of infrastructure along the lines suggested by Ms O'Brien and Mr Norton could be incorporated into the ODP by means of a narrative setting out the infrastructure requirements associated with development of this area.
- 12 This detail has now been included in Appendix 1A to the Joint Statement .
- 13 In terms of Policy 6.3.3 (7), it is noted that the experts have made no reference in the narrative to the ODP to the funding of the proposed sewer infrastructure. This issue was previously addressed in Mr Halls' evidence, where he confirmed that existing sewer capacity is able to accommodate only the first 200 residential allotments within the NHODP area.
- 14 Mr Hall went to say that the additional capacity would be provided by new infrastructure identified in the Council's Long Term Plan, with the funding for these works having been set for 2015-2017.² Should it be thought necessary by the Panel to include such a specific reference to funding o
- 15 f this infrastructure via the LTP, a statement to this effect could be added to the narrative of the ODP. This would however represent a level of detail not found in any other ODP within the Proposed Plan.
- 16 In terms of stormwater, the ODP (Appendix 1C to the Joint Statement) has been amended to include an indicative stormwater management area in the location described by Mr Hall in his previous evidence.³ Appendix 1 to Mr Hall's evidence (**attached**) identified the construction of this facility to be in phases, with Phase 1 intended to accommodate stormwater associated with the Meadowlands Exemplar Zone, the Key Activity Centre and a segment of the Residential New Neighbourhood Zone. Phase 2 will accommodate the balance of the RNNZ development.
- 17 The location and design of the stormwater facilities has (as Mr Hall) indicated been the subject of protracted discussions between the Council and Danne Mora. There is a high level of agreement as to matters of design, scale and location. However the flexibility Mr Norton viewed as being desirable has been maintained by identifying the location of the stormwater facility as flexible.
- 18 Taking all infrastructure related amendments into account therefore, the ODP and associated narrative comprehensively address the relevant requirements of Policy 6.3.3. 3(f) and 6.3.3 (6), the issue of funding excepted. As noted above, this could be addressed by the addition of a general statement setting out an expectation that infrastructure funding will be on a mixed landowner/ Council basis.

The Issue of Density Within the Context of Policy 6.3.3

- 19 It was also acknowledged in opening that, in comparison to other ODP's, the North Halswell ODP did not identify different areas of residential density.
- 20 Accepting that it is not mandatory for ODP's to identify a range of densities, the Planning Experts have agreed on inclusion of the following wording in the narrative to the ODP:

² Statement of Evidence of Andrew James Emil Hall dated 20 March 2015, at paragraphs 14-16.

³ Statement of Evidence of Andrew James Emil Hall dated 20 March 2015, at paragraphs 22-30 and Appendix 1

Land Use and Density

1. *The minimum net density for the North Halswell ODP area shall be 15hh/ha. It is anticipated development within the Meadowlands Exemplar zone and development in or near the Commercial Core (KAC) zone will achieve net densities higher than 15hh/ha.*
2. *Medium density development shall be located in areas with good access to public open space, public transport routes, community facilities and commercial facilities.*

21 As noted above, Policy 6.3.3 can be given effect to by means of policies. To that end, the Panel may recall from the Residential Hearing that Danne Mora sought a specific amendment to Policy 14.6.2 of Chapter 14 along the following lines:

14.1.6.2 Policy – Higher density housing location

- a. Ensure that some higher density housing is located to support, and have ready access to, commercial centres and public transport, and to provide opportunities for walking and cycling, and ready access to open space;
- b. *Within the North Halswell Residential New Neighbourhood Zone, encourage medium density residential development up to 30 households per hectare within 400 metres of the Civic Park in the North Halswell Key Activity Centre*

22 In my submission, inclusion of a policy along the above lines would provide greater clarity as to appropriate locations for density above the 15hh/ha threshold and would assist in better implementing Policy 6.3.3.

23 Having regard to the amendments to the ODP now agreed by the experts, the detailed checklist in Appendix 1B and (if necessary) the further suggested amendments above, in my submission it can readily be concluded that the provisions for the North Halswell ODP area give effect to the Regional Policy Statement in its entirety, Policy 6.3.3 included.

Ring Fencing the Meadowlands Exemplar Zone

24 This was raised as a preliminary matter at the hearing on Wednesday 24 June 2015.

25 It has now been addressed in the Caucusing Statement of 30 June 2015, which is signed by the planning witnesses for the Council and Danne Mora. The amendments agreed by Mr Brown and Mr Long reinforce the fact that the Exemplar Zone is self-contained, and is to be insulated from the wider residential provisions in Chapters 8 & 14, albeit the Exemplar provisions are consistent with the direction and outcomes sought in these Chapters.

26 In addition, it is noted that the North Halswell ODP has been amended to specifically identify the Meadowlands Exemplar Zone, albeit it should be a fixed (rather than indicative) element.

Density Transfer Mechanisms

27 The Joint Statement refers to a number of potential mechanisms which would allow for the transfer of developments between landowners, or within the landholdings of a single owner.

28 The Experts agree that different densities within ODP areas need not necessarily be spatially identified, but could also be achieved through the ODP narrative. In addition, as submitted above, a clear policy identifying the appropriate location for higher density development is appropriate.

29 The other mechanisms canvassed by the Planning Experts include:

- (a) Limited Notified Consent Process
- (b) Development Agreement
- (c) Joint Application
- (d) Rolling Density Monitoring
- (e) Internal Density Transfer

Limited Notification

30 In principle, this suggestion appears workable and is supported, although it is not clear precisely how the scenario suggested by the planners fits within the notification provisions of the RMA. More specifically, if an applicant proposes to develop at a lower density of say 10 households/ha, how would this qualify as an adverse effect on the environment, bearing in mind that the Plan contemplates greater effects at a higher density?

31 In addition, a limited notified consent process introduces a degree of uncertainty of outcome. Nevertheless, it is a consenting pathway which individual landowners would be free to follow if, for whatever reason, developing to a density of 15 households per hectare could not be achieved or was not considered desirable.

Development Agreement

32 This mechanism is supported on the proviso that such an agreement is legally enforceable by the Council against a landowner and the existence of the agreement is protected by a memorandum of encumbrance on the relevant certificates of title. This would ensure that any purchaser of the land is aware of the existence of the agreement.

Joint Application

33 This mechanism is supported, noting that it would be unnecessary to amend the provisions of Chapter 8 to accommodate such an arrangement.

Rolling Density Monitoring

34 In principle, this could work if the Council maintained an accurate register of consents that have been approved for an ODP area, so that an applicant later in time could develop to a lower density than 15 households per hectare if of course the consents previously approved enabled a higher density. In addition, an applicant would also have to demonstrate that developing to a lower density would ensure that an average of 15 households per hectare was maintained.

Internal Density Transfer

35 This is supported, noting the comment that the establishment of higher density within a landholding can be, and has in practice been, enforced by means of a consent notice.

Conclusion on Density Transfer Mechanisms

36 As a general comment, all of the transfer mechanisms appear workable. In terms of how they could be captured within Chapter 8, it is possible for these mechanisms to be considered as part of a non-complying application.

37 The Panel may however consider it preferable to create a new restricted discretionary category to enable lower density development within an ODP area, on the proviso that one or more of the mechanisms referred to above applied. If such mechanisms did not apply,

then the consent status would default to non-complying activity as is the current requirement in Chapter 8 for developments that do not achieve the minimum 15 households per hectare standard.



G J Cleary

Counsel for Danne Mora Holdings Limited

1 July 2015

NO.	DATE	DESCRIPTION

LEVELS:	
F.S.1	PROPOSED FINISH LEVEL
H.S.1	PROPOSED HIGH WATER LEVEL
H.S.2	PROPOSED HIGH WATER LEVEL (SEWER)
H.S.3	PROPOSED HIGH WATER LEVEL (STORMWATER)
H.S.4	PROPOSED HIGH WATER LEVEL (OVERFLOW)
H.S.5	PROPOSED HIGH WATER LEVEL (STORMWATER)
H.S.6	PROPOSED HIGH WATER LEVEL (STORMWATER)
H.S.7	PROPOSED HIGH WATER LEVEL (STORMWATER)
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PROPOSED SERVICES:	
1.0	SEWER SERVICE
2.0	STORMWATER SERVICE
3.0	WATER SERVICE
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DAVIE LOVELL-SMITH
 PLANNING SURVEYING ENGINEERING

115 Village Road, PO Box 877, Meadowlands, Haiswell
 Telephone: 08 3784030, Fax: 08 3784034

SHEET TITLE:	
Stormwater, Sewer & Water Supply Catchments	
DRAWING STATUS:	
For Information	
SCALE:	DATE: March 2015
CAD FILE:	PROJECT:
DRAWING NO:	SHEET NO:
E.18431	
R1	

