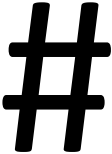
	<p>Resource Management Act 1991 Christchurch District Plan Private Plan Change XX Section 32 Evaluation and AEE</p>	
<p align="center">PARTIAL REMOVAL OF MEADOWLANDS EXEMPLAR OVERLAY, NORTH HALSWELL</p> <p>Overview</p> <p>The following report has been prepared by Spreydon Lodge Limited (the applicant) in support of their request for a plan change to the Christchurch District Plan, which proposes to remove the south-eastern section of the Meadowlands Exemplar Overlay from the District Plan as identified on Planning Map 45A and the North Halswell Outline Development Plan.</p> <p>It has been prepared in accordance with the requirements of Section 32 of the Resource Management Act 1991 (RMA).</p> <p>Spreydon Lodge Limited is seeking to remove the south-eastern section of the Meadowlands Exemplar Overlay area in order to facilitate development of this area using the more efficient Residential New Neighbourhood provisions of the District Plan. Exemplars were intended to showcase different approaches to development, with regard to planning, financing, construction processes and governance models. Ultimately exemplars should be able to demonstrate that medium density housing can offer viable, diverse and attractive housing choices and living environments. Unfortunately the comprehensive design-build approach that is inherent to the Exemplar within the District Plan has not occurred due to various factors. In particular the concept of the Neighbourhood Plan and Design Guide has created a level of complexity that deters potential suitors. This has resulted in very slow uptake of development opportunities within the north-western section of the Exemplar area, especially when compared to neighbouring developments under Residential New Neighbourhood zone provisions.</p>		

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1 Introduction

1.1 Purpose of this report

1.1.1 The overarching purpose of section 32 (s32) of the Resource Management Act 1991 (RMA / Act) is to ensure that plans are developed using sound evidence and rigorous policy analysis, leading to more robust and enduring provisions. This is achieved by evaluating whether the proposed changes is the most appropriate way to achieve the objectives of the Plan. The effectiveness and efficiency of the proposed provisions must also be assessed.

1.1.2 The purpose of this report is to fulfil the s32 requirements for proposed Plan Change XX - Title. In addition, the report examines any relevant directions from the statutory context including higher order documents, and provides an Assessment of Environmental Effects (AEE)

2 Resource Management Issue

2.1 Issue being addressed

2.1.1 Spreydon Lodge Limited requests a change to the Christchurch District Plan to reduce the extent of the Meadowlands Exemplar Overlay situated within the North Halswell Outline Development Plan area and shown on Planning Map 45A. The North Halswell Development Plan area is shown in Figure 1 below. The Meadowlands Exemplar Overlay area is the cross-hatched area in the north east which is parallel to Hendersons Road.

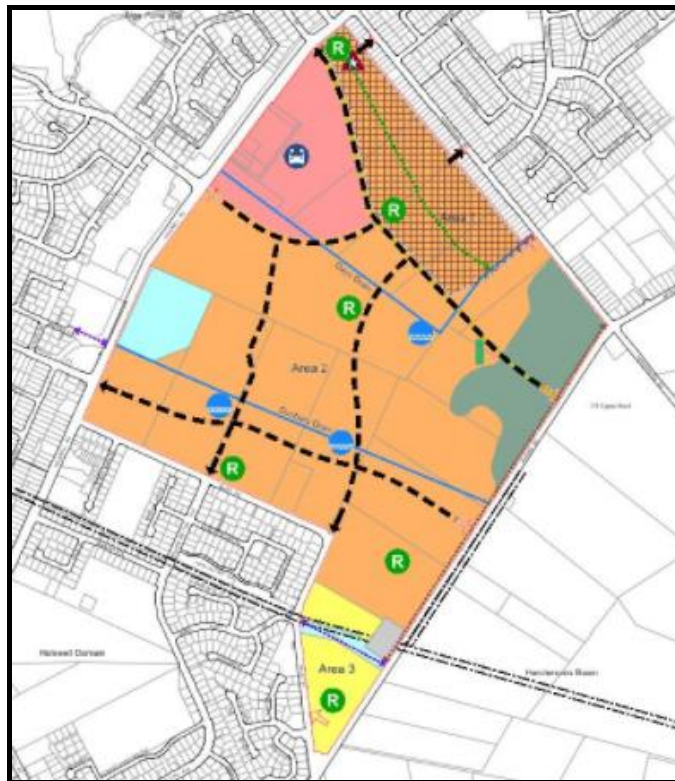


Figure 1 – North Halswell Outline Development Plan

2.1.2 This Plan Change reduces the extent of the Meadowlands Exemplar Overlay area by deleting the south-eastern section which lies to the south east of Manarola Road and Brancion Street. This change will result in an amended Planning Map 45 and amended North Halswell Outline Development Plan as shown below in Figures 2 and 3 and contained in Appendix A.

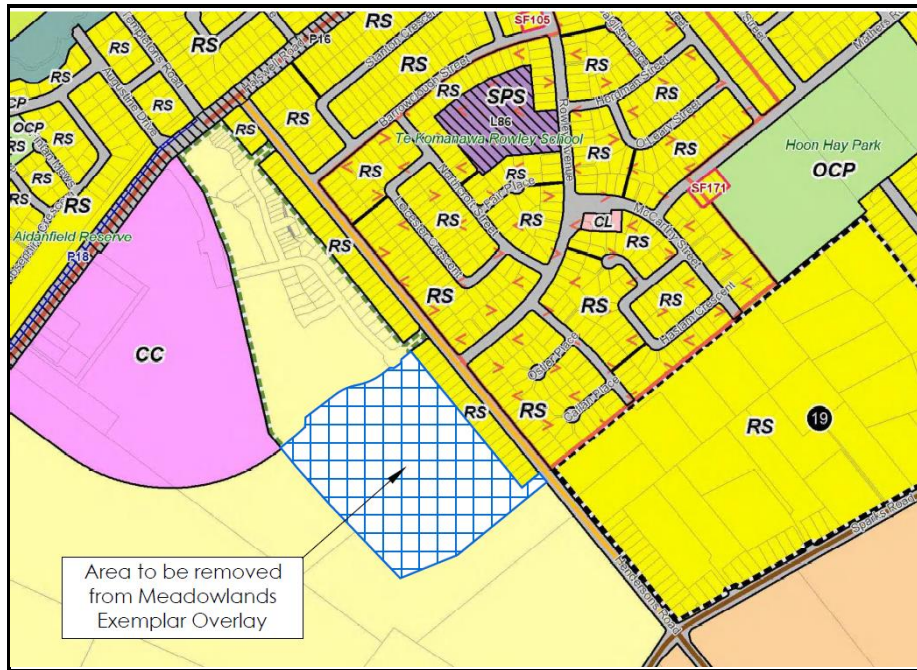


Figure 2 – Amended Planning Map 45A

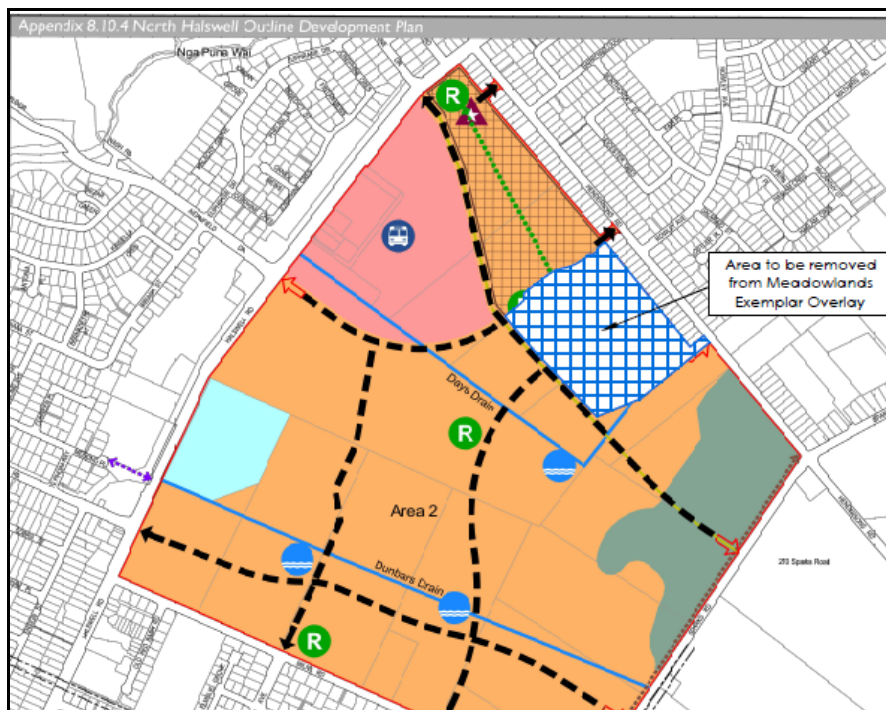


Figure 3 - Amended North Halswell Outline Development Plan

2.1.3 As part of the Land Use Recovery Plan a number of exemplar medium-density housing projects were identified. These projects were intended to provide models for a new standard of housing.

The aim of exemplar projects was to provide best practice examples and promote interest and stimulate demand thereby encouraging additional supply of medium density housing. The exemplars were intended to showcase different approaches to development, with regard to planning, financing, construction processes and governance models. Ultimately exemplars should demonstrate that medium density housing can offer viable, diverse and attractive housing choices and living environments.

- 2.1.4 Unfortunately the comprehensive design-build approach that is inherent to the Exemplar within the District Plan has failed to materialise. The concept of the Neighbourhood Plan and Design Guide has created a level of complexity that deters potential suitors. Several attempts to salvage the Exemplar have been embarked upon, such that achieving Exemplar outcomes are contingent on a series of underlying land use consents and updates by way of variations. Unfortunately these potential solutions have only created a different but nonetheless confusing set of parameters that continue to act as a deterrent to progress.
- 2.1.5 Since commencement in 2016 only 43 houses have been built or are under construction whereas it was envisaged that the development, which can accommodate 94 houses, would be one of the first completed after the earthquakes. The early completion (which has not occurred) was a key objective to enable it to act as an exemplar for other medium density developments. By contrast Milns Park adjoining the Meadowlands Exemplar area commenced development in 2018 and has already sold 135 lots (86%) of the lots they have brought to the market.
- 2.1.6 The underlying land use consent which informs all built development on subdivided lots contains a highly prescriptive (and subjective) set of design conditions. Due to the process relying on a resource consent there is no discretion available to be applied where a high quality house design is proposed but conditions of existing resource consent are not met. As a result of this inflexibility, a series of additional individual consents have been obtained for future owners by the developers to facilitate take up. On several occasions the need for such consents has not been identified until Building Consent stage, with Section 37 certificates issued. This complex process and the limitations on design placed by the Council has resulted in the great majority who have been interested in building a house at Meadowlands walking away and going elsewhere where they build a house that works for them relying on a process that is familiar and flexible enough to accommodate individual preferences.
- 2.1.7 This tension has in part resulted in a failure of the Council to meet its obligations under the statement of commitment prepared in 2014 which incorporates an agreed process and set of evaluation criteria. The agreed process requires the Council and CERA *to facilitate the delivery of the exemplar schemes through an efficient consenting process* which included a specific set of options for achieving this. This has not happened.

2.2 Meadowlands Exemplar Housing Development

- 2.2.1 Action 8 of the Land Use Recovery Plan (LURP) directed that the Christchurch City Council enable a range of exemplar medium density housing projects. In February 2014 the Council agreed to a process and a set of criteria to consider and evaluate projects. Subsequent to this a Statement of Commitment was agreed by Dannemora Holdings Ltd and the Wayne Francis Charitable Trust. This Commitment was then approved by the Council on 24 April 2014. This is the document referred to in the various rules in the Subdivision and Residential chapters of the District Plan. It is noted that only one other developer (Ngai Tahu) considered the possibility of being involved in the exemplar project but declined to do so

when it became clear how restrictive and complex the process was both for the developer and potential purchasers of residential units.

2.3 Criteria for evaluating exemplar housing developments

- 2.3.1 The deliverable components for exemplar projects contained in the Statement of Commitment are:
- High quality, safe and accessible residential environment that address their neighbourhood context
 - Well-built and energy efficient
 - Innovation within the housing market
 - Appropriate to the locality
 - Diversity and affordability of housing projects
 - Medium density
 - Showcasing and sharing of Exemplar experience
- 2.3.2 The approach is based on “comprehensive development” which involves subdivision and building design and consent occurring concurrently. This approach creates a “tight fit” for buildings and sites and works well for projects involving group housing, that is housing that is both developed and sold as a single entity. However despite various approaches and incentives to organisations and individuals it has been very difficult to attract group buyers. There are also impediments for individual buyers as they have found it difficult to work within such a tight and complex set of parameters for their new house. To achieve something satisfactory for home buyer resource consents for individual houses have had to be obtained as these are a variation from an earlier consent.

2.4 District Plan Provisions

- 2.4.1 The objectives, policy and rules relating to the Meadowlands Exemplar development are contained in the Subdivision, Development and Earthworks Chapter 8 in the District Plan.
- 2.4.2 Objective 8.2.2 – Design and amenity and the Meadowlands Exemplar Overlay contains design and amenity outcomes sought for all development as well as specifically addressing the overlay as follows:
- b. A comprehensively planned development in the Meadowlands Exemplar Overlay in the Residential New Neighbourhood (North Halswell) zone that is environmentally and socially sustainable over the long term*
- 2.4.3 This is supported by Policy 8.2.2.12 – Meadowlands Exemplar Overlay comprehensive development which states:
- a. Ensure that the Meadowlands Exemplar development is comprehensively planned and designed through development of, and giving effect to, an overarching vision that:*
 - i. responds positively to the local context of each area;*
 - ii. produces short and long-term positive environmental, social, and mana whenua outcomes;*
 - iii. fully integrates **subdivision** layout with potential land use;*
 - iv. integrates residential development with the supporting range of local **community facilities** and services that support residents' daily needs;*
 - v. achieves an efficient and effective staging of the provision and use of infrastructure, stormwater management networks, parks, and open space networks that is integrated with land use development;*

- vi. provides good access to facilities and services by a range of transport modes through the provision of integrated movement networks of roads, public transport, cycle, and pedestrian routes;
- vii. shows infrastructure and movement routes that are fully integrated with existing adjacent communities and enables connectivity with other undeveloped areas;
- viii. avoids or adequately mitigates risks from natural hazards and geotechnical characteristics of the land;
- ix. remediates contaminated land;
- x. utilises opportunities to enhance tangata whenua values, particularly indigenous biodiversity and mahinga kai;
- xi. recognises Ngāi Tahu cultural and traditional associations with the Otautahi landscape; and
- xii. avoids interim land use and development compromising the integrity and viability of infrastructure provision and community development.

2.4.4 Effectively this objective and policy amalgamate outcomes sought for all subdivision and development within the City but with the following additional elements:

- having a neighbourhood plan in place which provides an overarching vision for the whole area
- fully integrating the creation of lots with specific house designs.

2.4.5 The rules relating to this form of development are contained in the Subdivision chapter as follows:

8.5.1.3 Restricted Discretionary Activity (RD15)

Comprehensive Subdivision and landuse consent in the Meadowlands Exemplar Overlay are in the Residential New Neighbourhood (North Halswell) zone requires:

- i. Buildings have a maximum height of 11m
- ii. Buildings have a maximum of 3 storeys
- iii. Buildings facing the Key Activity Centre have a maximum of 2 storeys
- iv. The application must be accompanied by a Neighbourhood Plan which covers at least 8ha and which contains:
 - a. Detailed Design Statement containing an overall visions statement which identifies outcomes, analysis of the overall development structure and proposal for the Neighbourhood Plan including urban form, movement network, open space and services.
 - b. Context and Site analysis containing 16 elements
- v. The subdivision must have a developable area of at least 700m²
- vi. Building types are to contain at least 3 or more of the following:
 - a. Standalone house
 - b. Duplex
 - c. Terrace
 - d. Apartment

8.5.1.4 Discretionary Activity (D5)

Comprehensive Subdivision and landuse consent in the Meadowlands Exemplar Overlay are in the Residential New Neighbourhood (North Halswell) zone which has a developable area less than 7000m².

8.5.1.5 Non-complying activity (NC8)

All other subdivisions and/or land use in the Meadowlands Exemplar Overlay

2.4.6 These rules reinforce the link between subdivision and housing by requiring that every subdivision application must have a minimum area of 7000m² and must have a commitment to contain at least 3 residential building types. Any breach of the various standards, other

than the minimum subdivision area, results in the development being a non-complying activity.

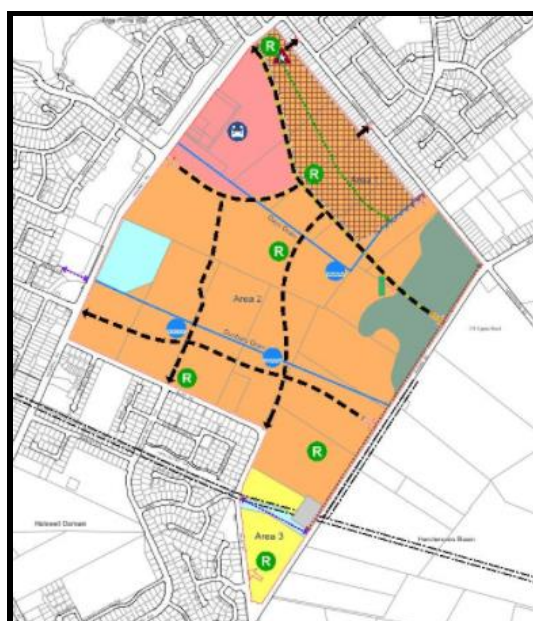
2.4.7 In addition to the above rules there are numerous other references and requirements within the District Plan applying to subdivision or development within the Meadowlands Exemplar Overlay area. These include a requirement that all development must be preceded by acceptance of a Neighbourhood Plan which must address a very wide range of analyses including those relating to context, site, design and development and cultural factors. Following from this any comprehensive development application (subdivision and land use for houses) needs to be considered in relation to the neighbourhood plan and in terms of a very long list of assessment matters relating to matters such as:

- place making, context and heritage
- building typology, mix and location
- relationship to street and public open spaces
- fences between residential units and road boundary
- road network access and parking
- infrastructure compliance with the outline development plan
- outdoor living space service storage
- minimum unit size
- consistency with the exemplar statement of commitment
- height, minimum and maximum storeys

3 The Environment

3.1 The Site and Surrounding Environment

3.1.1 The existing Meadowlands Exemplar Overlay (cross hatched below) is approximately 20.61ha in area and forms part of the Spreydon Lodge property (approximately 71.5ha) that occupies the northern area of the North Halswell Outline Development Plan (NHODP) area – see below. This land is one of the few remaining undeveloped “semi-rural” blocks in the city’s south-west. The NHODP is bounded by Halswell Road on the west and Hendersons Road on the north east boundary and Milns and Sparks Roads on the east and south-east



- 3.1.2 When the land was zoned Residential New Neighbourhood in 2017 it had a more or less rural appearance but was no longer being used for productive purposes being on the edge, rather than separate from the town. Until that point the majority of the Spreydon Lodge property was operating as an active horse stud. A small number of commercial/industrial operations are located within the overall area and in particular the Spreydon Lodge Homestead and Stables preschool are in the northern corner of the Meadowlands Exemplar Overlay.
- 3.1.3 The land, while appearing flat, in fact has a fall of approximately 5m towards the south-east (Hendersons Basin) at a gentle grade of 1 in 240. Views from the area can be obtained of the Port Hills to the east and the Southern Alps to the west. There are no waterways or springs with the Meadowlands overlay area, however the area generally has high groundwater levels. Stormwater management in the general area is complex and has required a comprehensive solution impacting on the properties in the area. Consequently stormwater in the general area requires detention and first flush treatment with release into Hendersons Drain. The Meadowlands Overlay area has both TC2 and TC3 classified land within its boundaries.
- 3.1.4 Residential development within the Meadowlands Overlay area has occurred at a slow pace since 2016. Consents have been obtained for the north western section which covers approximately 40% of the Overlay area. Of the 116 allotments that have been consented all have now been purchased with 43 having houses built or under construction. Development to date includes relocation of the Spreydon Lodge homestead, demolition of the Stables and establishment of a new preschool facility in its place called "The Stables". Residential development includes medium density housing much of which is 2 storeyed duplex housing.
- 3.1.5 The area west of the northern half of the Overlay area is identified as a Key Activity Centre (KAC) primarily providing for commercial and community uses to serve residents of the Halswell Area. The collector Road (Monsaraz Boulevard) provides a buffer between the Overlay area and KAC. To the north east the Overlay area adjoins the rear boundaries of a long length of "ribbon" residential development along the south west side of Hendersons Road. Across Hendersons Road are the fully- developed suburbs of Hoon Hay and Hillmorton. To the east of the Overlay area will be ponds to treat and detain stormwater from the NHODP area. Further east across Sparks Road is Henderson Basin which is gradually being developed for residential purposes. To the west is the Aidanfield residential area.

4 The Plan Change

4.1 Description of the Proposal

- 4.1.1 The Plan Change is a very simple one - it removes the south eastern section of the Meadowlands Exemplar Overlay. This area is currently undeveloped. This will enable development to occur in this section under the less complex consenting regime of the (underlying) Residential New Neighbourhood Zone. Developing and marketing housing within the area will then be subject to the same provisions as other land within the North Halswell Outline Development Plan area. To date the complexity of the consenting process and the rigid requirements contained in the subdivision and land use consents have proved to be a significant disincentive for potential purchasers.

- 4.1.2 The main purpose for the Exemplar has therefore failed as it was meant to provide an example for others to follow whereas the progress has been so slow that other developments have overtaken it. The process has also been extremely expensive for the landowners due to various factors. These include the large amount of documentation required for each comprehensive neighbourhood plan approval and the time taken to obtain consents. Further the inflexibility created by the consent requirements has turned away many potential owners from purchasing after they have worked through the detail of the requirements. This has created more delay and associated expense.

4.2 Proposed Amendments to the District Plan

- 4.2.1 The proposed amendments to the Christchurch District Plan are set out below:
- Remove the southwestern section of the Meadowlands Exemplar Overlay area from the North Halswell Outline Development Plan
 - Remove the southwestern section of the Meadowlands Exemplar Overlay area from Planning Map 45
- 4.2.2 These amendments are illustrated in section 2.1.2 of this Report and in Appendix A.

5 Consultation

- 5.1.1 The applicant has consulted with the Council policy planner (Mark Stevenson). The planner has in turn discussed the proposal with Council's urban designers and planners who have been involved in the processing the many consents that have been applied of over time to enable group (Neighbourhood Plan) and individual building developments within the Meadowlands Exemplar Overlay area. The applicant originally requested that the removal of the Meadowlands Exemplar Overlay occur as part of proposed Plan Change 5 to the District Plan which specifically provides for changes to the Planning Maps including changes relating to "the appropriateness of overlays for specific properties". The current plan change request was considered by the Council as a more appropriate response to the concerns raised by the applicant.

6 Assessment of Environmental Effects of the Proposed Change

6.1 Beneficial effects

- 6.1.1 The benefits of the removal of the Meadowlands Exemplar Overlay are that development of the overlay area will be able to proceed at the same rate as other Residential New Neighbourhood areas and at a much reduced cost to the developer and the public. This will be achieved by removing the unduly complex processes associated with the Exemplar approach which involves an overall consent to approve neighbourhood plans and detailed consent for subdivision and land use for individual and duplex houses.

6.2 Character, Amenity and Visual effects

- 6.2.1 Approximately half of the overlay area (area north-west of Manarola Road) has been consented, consented and built on or building is about to commence using the current comprehensive development consent process. This development is in general accord with layout approved through the original Neighbourhood Plan (refer below). The applicant is now seeking to complete the development of the remaining area south-east of Manarola

Road generally in keeping with the North Halswell ODP. Key ODP features such as the collector road, stormwater basins will inform the development of this area. Development of this area will be undertaken using Residential New Neighbourhood subdivision standards and will follow a more conventional methodology of creating lots for sale with prospective purchasers having greater autonomy to design houses more in-line with their own personal circumstances and preferences. The Developer has strict set of covenants in place which will continue to maintain a high level of amenity within this area.

6.2.2 The impact of the removal of Exemplar provisions on the character and amenity of the surrounding areas will be limited and not adverse. Effectively this new area will seamlessly blend both into the existing Exemplar development and future areas to the south and east which will be developed to Residential New Neighbourhood standards. With regard to the remainder of the Exemplar area it is anticipated that development to 15 household per hectare will result in a very similar look and feel as the first stage, particularly given the intention of the applicant to retain several design controls. Given the continuity of developer, group home builder clients and development framework it is not expected that there will be an obvious difference in overall amenity between the initial Exemplar Overlay area and the adjoining RNN area that is now being proposed.

6.2.3 With regard to the future development of the Key Activity Centre no adverse effects are anticipated with removal of the south eastern section of Exemplar Overlay. The only control in the Overlay rules relating to the KAC is that buildings are not to be more than 2 storeys high facing the KAC whereas elsewhere in the Overlay area houses can be 3 storeys. The relevant assessment matter in 8.8.15.13 refers to "*whether there is an inappropriate step change in heights between the Key Activity Centre and exemplar area*". It is unclear why this would require a lower height building near the KAC. In particular it is noted that the maximum height in this KAC, which is zoned Commercial Core, is 20m so a taller building opposite the centre would not seem out of place. However with the removal of the Exemplar Overlay the maximum height for buildings in this area will be 8m and so no obvious visual impacts are anticipated in relation to the KAC development.

6.3 Transportation

6.3.1 With regard to vehicles, cycling and walking there will be no change with removal of the Exemplar Overlay as the framework streets and connections to Hendersons Road will be the same as the Neighbourhood Plan framework. Likewise both active and passive transport modes will be provided within the second stage development.

6.4 Other matters

6.4.1 There are no other factors which differentiate the second stage of the Exemplar development from the first stage. In particular there are no natural hazards, land contamination or cultural values matters that need to be addressed.

7 Policy and Plan Framework

7.1 National Policy Framework

- Part 11 of the RMA
- NPS Urban Development

7.2 Part II of the Resource Management Act

7.2.1 Part II of the Resource Management Act defines the purposes and principles of the Act, which are the overarching matters that should be taken into account in preparing policy statements and plans and when considering a resource consent application. In terms of this request for a plan change it is considered that the most relevant sections of Part II are sections 5 and 7. There are no relevant matters of national importance that are relevant to this proposal, and as such no assessment against this section has been made. The relevant sections are as follows:

5 Purpose

- (1) *The purpose of this Act is to promote the sustainable management of natural and physical resources.*
- (2) *In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety while—*
 - (a) *Sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*
 - (b) *Safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and*
 - (c) *Avoiding, remedying, or mitigating any adverse effects of activities on the environment.*

7 Other matters

In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall have particular regard to—

...

(b) The efficient use and development of natural and physical resources: ...

(c) The maintenance and enhancement of amenity values:

...

(f) Maintenance and enhancement of the quality of the environment:

...

7.2.2 The removal of the Meadowlands Exemplar Overlay is requested so that the use and development of the land resource within the Spreydon Lodge site can be managed *at a rate which enables the social and economic wellbeing* to be met. Currently this is not occurring as the costs and timing associated with obtaining resource consents for each house is too cumbersome. This has resulted in disappointment for potential buyers and significant frustration for the developers. The changed approach without this additional layer of administration will not impact the natural environment in any way different from the current form of development and so the proposal promotes sustainable development as defined in section 6 of the RMA.

7.2.3 With regard to section 7 of the RMA the proposal will result in development that maintains and enhances the quality of this area through completion of the neighbourhood framework in this northern section of the NHODP are. Amenity elements of the first stage will be carried through to the second stage well-designed reserve areas with indigenous plantings which are readily accessible. The removal of a complicated form of resource management administration will be a more efficient means of providing for use of natural and physical resources within Northern Halswell as provided for through its Residential New Neighbourhood zoning.

7.3 National Policy Statement on Urban Development

7.3.1 The **National Policy Statement on Urban Development (NPS-UD)** came into effect on 20 August 2020, providing direction to decision-makers under the Resource Management Act 1991 in respect of planning for urban environments. The Policy Statement replaces the National Policy Statement on Urban Development Capacity 2016 (NPS-UDC). The NPS-UD recognises at a national level the significance of well-functioning urban environments. In particular the Objectives of the NPS-UD seek the following:

- a) *Urban environments that provide for the social, economic and cultural well-being and for their safety and safety now and in the future*
- b) **Planning decisions that improve housing affordability by supporting competitive land and development markets**
- c) *Regional policy statements and **district plans enabling more people to live in areas of urban environments near centres or areas with employment opportunities, areas well serviced by public transport or a high demand for housing in the area.***
- d) *Urban environments develop and change over time in response to diverse and changing need of people, communities and future generations*
- e) *Local authority decisions on urban development are integrates with infrastructure planning and strategic over the medium term and long*

7.3.2 The removal of the restrictive and costly level of control created by the design and administration of the Exemplar Overlay provisions will support the competitive land and development market (item b above) in Christchurch, and in particular in the Halswell area. Currently there is not a “level playing field” as the applicant and potential purchasers have to go through more complex and costly procedures which makes them less competitive. Item c refers to enabling people to live in areas near centres with employment opportunities. The Meadowlands Exemplar Overlay area immediately adjoins what it is potentially a major commercial and community centre which will provide employment opportunities as well as very convenient access to these services. Enabling development in this area by removal of a significant impediment to development will achieve this objective.

7.4 Regional Policy and Plans

- Canterbury Regional Policy Statement
- Iwi Management Plan

7.5 Canterbury Regional Policy Statement

Chapter 6 CRPS

7.5.1 **Chapter 6** is intended to address the issues relating to growth and development within the Greater Christchurch Area. The most relevant objective is **Objective 6.2.2** which seeks provisions of sufficient land for rebuilding and recovery need. The associated urban form and settlement pattern is to achieve consolidation and intensification of urban areas. In particular the settlement pattern is required to provide for “*greenfield priority areas on the periphery of Christchurch’s urban area...that meets anticipated demands and enables the efficient provision and use of network infrastructure.*” The Meadowlands Exemplar Overlay sits within an identified greenfield priority area. However it has not been able to efficiently provide for, and meet, the demand for housing despite being zoned for residential purposes. This is a result of the planning constraints placed on the Overlay area which the Council has used to require complex consenting processes, including for individual houses. Removal of the Overlay area would therefore better meet this objective.

- 7.5.2 **Policy 6.3.2** seeks that residential development gives effect to the principles of good urban design which include creating a sense of place, good integration of services, access routes, spaces and built form, connections within and beyond the develop met, choice and diversity of layout, and sustainable design. All these elements of good urban design will be present in stage 2 of the exemplar area without the need for detailed consenting of housing designs. This policy also supports “*opportunities for exemplar approaches to infrastructure and urban form to lift the benchmark for new areas.*” Again this will be achieved by the effective continuation of the urban form patterns in the overlay area but without the requiring consenting for individual houses.
- 7.5.3 **Policy 6.3.3** requires development within greenfield priority areas to occur in accordance with outline development plans providing for a number of elements including principal roads and land to be used for community, business and recreation activities, and stormwater treatment areas. All these elements are contained in the North Halswell Outline Development Plan and development in the remainder of the Meadowlands Overlay Exemplar area under Residential New Neighbourhood provisions will achieve full compliance with the ODP.

7.6 District Policy and Plans

- 7.6.1 The **Strategic Directions Objectives** in Chapter 3 of the District Plan set out goals and guidance relating to the contents of the District Plan. A number of these objectives are directly relevant to the purpose of the exemplar development and its implementation. These objectives are set out in the section below along with comments on their relevance.

3.3.1 Objective - Enabling recovery and facilitating the future enhancement of the district

The expedited recovery and future enhancement of Christchurch as a dynamic, prosperous and internationally competitive city, in a manner that:

- I. Meets the community’s immediate and longer term needs for housing, economic development, community facilities, infrastructure, transport, and social and cultural wellbeing; and*
- II. Fosters investment certainty; and*

- 7.6.2 Objective 3.3.1 specifically refers to an “expedited recovery” of which the exemplar was to be an important component. As mentioned in the assessment of effects this has not happened due to the complex consenting process which has deterred many housing companies and potential owners. The exemplar has, as a consequence, also failed to “foster investment certainty” with the owners being placed in a vulnerable position.

3.3.2 Objective - Clarity of language and efficiency

The District Plan, through its preparation, change, interpretation and implementation Minimises:

- A. transaction costs and reliance on resource consent processes; and*
- B. the number, extent, and prescriptiveness of development controls and design standards in the rules, in order to encourage innovation and choice; and*
- C. the requirements for notification and written approval; and*
- D. Sets objectives and policies that clearly state the outcomes intended; and*
- E. Uses clear, concise language so that the District Plan is easy to understand and use*

- 7.6.3 Objective 3.3.2 is directly relevant as the Exemplar Overlay provisions and their “interpretation and implementation” have increased transaction costs and reliance on (complex) resource processes to the extent that it has resulted in the public choosing to build elsewhere, thus defeating the purpose of the development being an exemplar. The

potential for this to occur is exactly why the Strategic Objectives were inserted into the District Plan and in the present case has not been avoided.

- 7.6.4 Overall the exemplar overlay, despite good intentions, has not met the requirements of the Strategic Objectives of the District Plan. The proposed plan change provides a good opportunity to recognise this and to remove the overlay over the remaining undeveloped area.

8 Section 32 Assessment

8.1 Criteria of Section 32 Assessment

8.1.1 Before a proposed Plan Change is publicly notified an evaluation must be carried out by the person making the request. The evaluation, carried out under Section 32 of the Resource Management Act, must examine:

- (a) the extent to which each objective is the most appropriate way to achieve the purpose of the Act; and
- (b) whether, having regard to their efficiency and effectiveness, the policies, rules, or other methods are the most appropriate for achieving the objectives.

8.1.2 The evaluation is required to take into account:

- The benefits and costs of policies, rules, or other methods; and
- The risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the policies, rules, or other methods.

8.1.3 The Guidance Note on Section 32 analysis on the Quality Planning website makes the following statement:

Appropriateness - means the suitability of any particular option in achieving the purpose of the RMA. To assist in determining whether the option (whether a policy, rule or other method) is appropriate the **effectiveness** and **efficiency** of the option should be considered:

- **Effectiveness** - means how successful a particular option is in addressing the issues in terms of achieving the desired environmental outcome.
- **Efficiency** - means the measuring by comparison of the benefits to costs (environmental benefits minus environmental costs compared to social and economic costs minus their benefits).

8.1.4 In this case it is the appropriateness of removing the remaining undeveloped area of Meadowlands Exemplar Overlay from the District Plan that needs to be considered.

8.2 Objectives of the Christchurch District Plan

8.2.1 The Plan Change retains Subdivision Objective 8.2.2 with its reference to the Meadowlands Exemplar Overlay in the heading of the objective and clause b which states:

A comprehensively planned development in the Meadowlands Exemplar Overlay in the Residential new Neighbourhood (North Halswell) zone that is environmentally and socially sustainable over the long term.

8.2.2 This objective is to be retained but will apply to the area of the Exemplar to the north west of Manarola Road which is now largely developed. The area to the south east will be subject to clause A of Objective 8.2.2 which requires an “*integrated pattern of development and urban form through subdivision and comprehensive development*” that:

- i. provides allotments for the anticipated or existing land use for the zone*
- ii. consolidates developed for urban activities*
- iii. improves people’s connectivity and accessibility to employment, transport, services and community facilities;*
- iv. improves energy efficient and provides for renewable energy and use; and*
- v. enables the recovery of the district*

8.2.3 Section 32(3)(a) requires consideration as to whether the removal of a section of the land within the Meadowland Exemplar Overlay is the most appropriate way to achieve the purposes of the Act. The purpose of the Act is to promote the sustainable management of natural and physical resources which means managing development **in a way, or at a rate** which enables people and communities to provide for their social, economic and cultural wellbeing subject to a series of bottom lines which are not directly relevant to the situation. The current provisions in the District Plan and the manner in which these are being administered do not manage development in a way or at a rate which enables people to provide for the social and economic wellbeing. Rather the current situation has resulted in extensive delays in houses establishing within the overlay area and significant additional expense involved for the developer and potential home owners.

8.2.4 Secondly, the remaining stages of the development will still be subject to a wide range of assessments in relation to urban form and design, servicing, connectivity, and sustainability and so will achieve the desired quality of suburban residential development sought by the District Plan.

8.2.5 For these reasons it is considered that the proposed reduction of the Meadowland’s Exemplar Overlay better achieves the purpose of the Act.

8.3 Assessment of the Benefits and Costs of the Proposed Change

8.3.1 In order to determine the effectiveness and efficiency of the proposed reduction of the Meadowlands Exemplar Overlay an assessment of the benefits and costs of the proposed Plan Change, together with an examination of the risks of acting or not acting based on the information provided is required. In order to determine the relative benefits and costs of the proposed change, options other than the proposal should also be examined. In terms of this proposal the options considered are:

- Option 1 – Retain the Meadowlands Exemplar Overlay
- Option 2 –Remove the undeveloped south-eastern section of the Meadowlands Exemplar Overlay
- Option 3- Persuade the Council to adopt a very simple consent process for development within the Overlay area

Benefits and Costs of Option 1 – Retain the Meadowlands Exemplar Overlay

Benefits/Advantages	Costs/Disadvantages
<ul style="list-style-type: none"> Will ensure a specified mixture of housing typologies will occur 	<ul style="list-style-type: none"> Does not minimise transaction costs and reliance of resource consent processes Does not reduce the prescriptiveness of development controls and design standards applied during consenting Reduces level of choice for potential purchasers of residential allotments in the North Halswell area

Benefits and Costs of Option 2 - Remove the undeveloped south-eastern section of the Meadowlands Exemplar Overlay

Benefits/Advantages	Costs/Disadvantages
<ul style="list-style-type: none"> Enables development within the area while still being subject to RNN consent process to ensure quality residential environments established. Creates a simpler consenting environment resulting in time and money savings for purchasers and the developers Implements CPRS and Strategic Objectives of the District Plan. Provides for changes in buyers preferences over time e.g. the acceptance of duplex and apartment style housing. 	<ul style="list-style-type: none"> Cost of plan change process Potential for reduced consistency in house design.

Benefits and Costs of Option 3 – Persuade the Council to adopt a very simple consent process for development within the Overlay area

Benefits/Advantages	Costs/Disadvantages
<ul style="list-style-type: none"> Avoids changing the District Plan 	<ul style="list-style-type: none"> Unlikely to be successful Will involve time and money to achieve Relies on a long term commitment by the Council but unlikely to be consistently implemented with changes in staff over time. Provides no certainty for developer or the potential purchasers as to what development will be acceptable.

8.3.2 The above assessment highlights that the advantages and benefits of reducing the size of the Meadowlands Exemplar Overlay (Option 2) outweigh the potential costs and disadvantages. Whilst the costs or disadvantages of the other options clearly indicate that they are not the most appropriate.

8.4 Effectiveness

8.4.1 In determining the effectiveness of the Plan Change and other options to achieve the objectives, it is considered appropriate to include within “the objectives” the objectives of the relevant broader policy documents. These matters are considered in more detail in Sections 6.1 and 6.2 of this report. These objectives are particular relevant because they set out, at a strategic level, how residential development should be provided for at a national and regional level. On this basis the proposed Plan Change is assessed to be the most

effective to achieve the objectives of the National Policy Statement – Urban Development, District Plan, and CRPS 2013.

8.5 Efficiency

- 8.5.1 In determining efficiency, it is necessary to compare the costs and benefits of the three options listed in the tables above. These costs and benefits relate to a variety of matters including environmental and process matters. In relation to these matters Option 2 has a greater number of benefits/advantages as compared to Options 1 and 3, while Option 2 has the same or lesser costs/disadvantages.

Assessment Regarding Information Provided

- 8.5.2 There is a large amount of information available about the site and the effects of development occurring under the Residential New Neighbourhood zone regime and the exemplar regime; as such it is considered that there are no risks in acting with the current level of information.

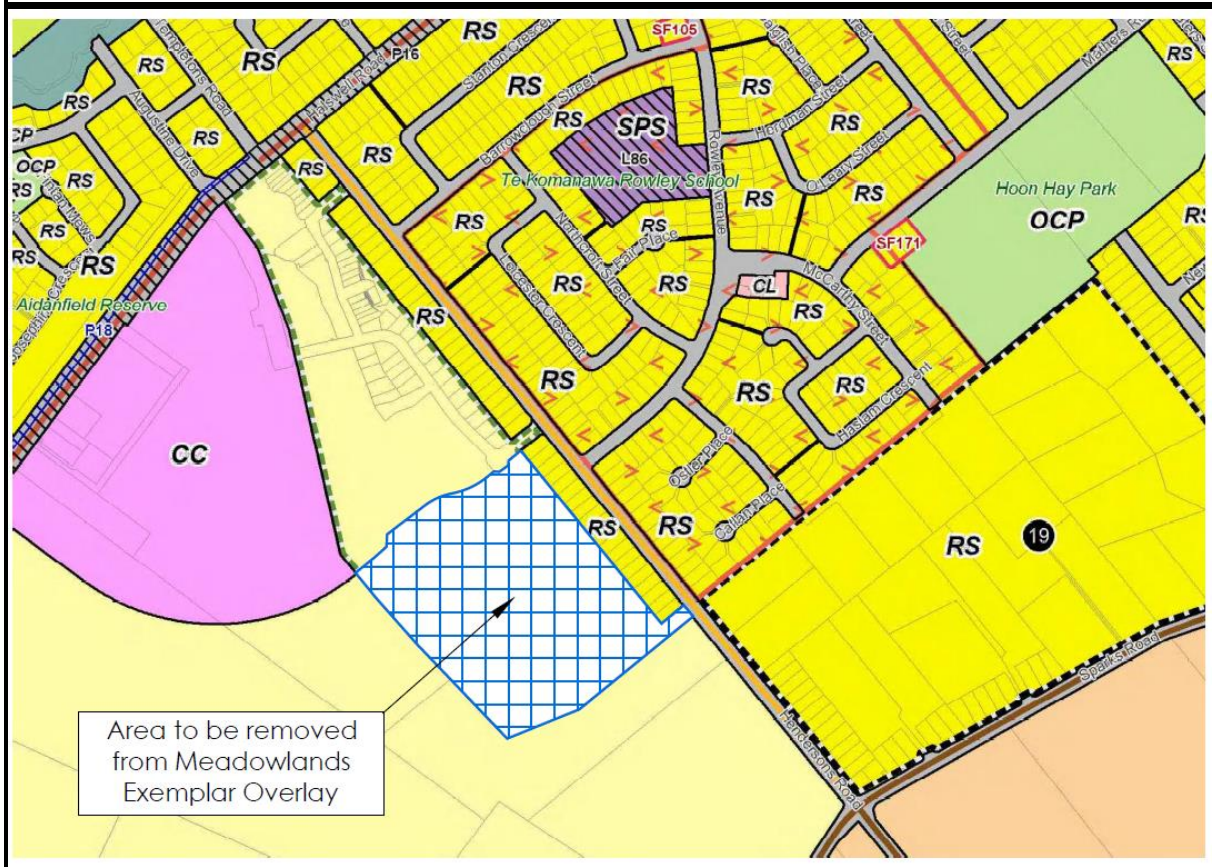
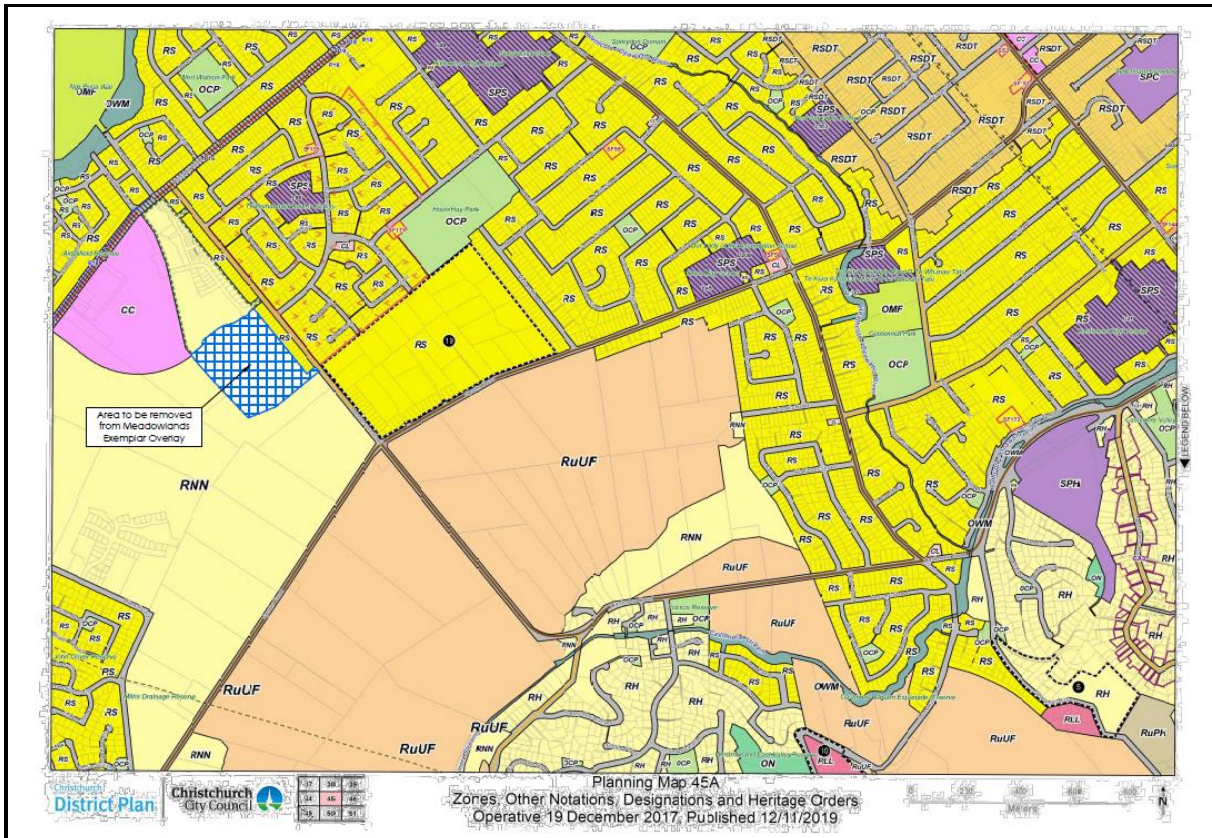
8.6 Overall Assessment

- 8.6.1 Based on the assessment above, the overall conclusion is that the Proposed Plan Change is a more appropriate method for achieving the objectives and policies of the District Plan than the existing plan provisions or the alternatives canvassed above. It is also concluded that the environmental, social and economic benefits of the Proposed Plan Change outweigh any of the costs. On this basis, the proposed reduction of the Meadowland Exemplar Overlay are within the North Halswell Outline Development Plan area is considered to be an appropriate, efficient and effective means of achieving the purpose of the Resource Management Act.

9 March 2021

APPENDIX A – PLAN AMENDMENTS

MAP 45A



North Halswell Outline Development Plan

