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Tēnā koe Craig Friedel,

### **PRIVATE PLAN CHANGE 23 (PC23) - REQUEST FOR INFORMATION RESPONSE**

- 1 This letter relates to Private Plan Change 23 (*PC 23*), which is a proposal to rezone the properties generally located at 144, 156 and 176 Turners Road and 220 and 240 Spencerville Road, Marshlands (*Site*) from a Specific Purpose (*Golf Resort*) Zone and Rural Urban Fringe (*RUF*) Zone to a Residential New Neighbourhood (*RNN*) Zone.
- 2 In accordance with clause 23 of Schedule 1 of the Resource Management Act (*RMA*) on 11 June 2025, the Christchurch City Council (*Council* or *CCC*) requested further information on PC 23, to enable it to better understand the nature of the request in respect of the effects it will have on the environment (*RFI*).
- 3 The purpose of this letter is to provide a fulsome response to Question 1 of the RFI, which was as follows:

*As you will be aware, clause 25 of Schedule 1 of the RMA sets out the process for how local authorities must consider a request to change an operative district plan. Sub-clause 4A sets out that a specified territorial authority must not accept or adopt a request if it does not incorporate the Medium Density Residential Standards (MDRS). Section 77G (1) requires that every relevant residential zone must incorporate the MDRS. It is unclear what implication sub-clause 4A of Schedule 1, and the need for requests seeking residential zonings to incorporate the prescribed MDRS, has on PC23. The PC23 assessment of clause 25 of Schedule 1 does not address this issue and identifies that it is appropriate to allow the request to be considered through the standard Schedule 1 process.<sup>1</sup>*

*The CCC requests that the proponent provides an assessment of what implication, if any, sub-clause 4A of Schedule 1 has on the processing of PC23. This response should also outline what implication the need to apply the MDRS to the RNN Zone portion of the site would have on the changes that are being sought to the Operative Christchurch District Plan*

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<sup>1</sup> PC23 Whisper Creek, Section 32 Analysis, 1.3 Accepting the Plan Change Request – Clause 25, pg.6 & 7.



(the CDP), as well as CCC's ability to accept the request for processing under clause 25 (2)(b)."

### **Executive Summary**

- 4 In summary, qualifying matters (QMs) under 77I(a), (f) and (j) have been identified, which require PC23 to be less enabling of development than what is provided for under the Medium Density Residential Standards (MDRS). The Council is therefore not required to incorporate the MDRS as required by section 77G(1).
- 5 These QMs have been discussed below and were identified within the PC 23 application. The existence of these QMs / similar QMs were identified as QMs by the Panel through the Council's proposed housing and business choice plan change (PC 14) as matters that were necessary to be accommodated under section 77I.
- 6 A Section 32 Addendum, attached in **Appendix One**, has also been prepared in support. In the circumstances, rezoning the majority of the Site to RNN is considered appropriate.
- 7 We consider that PC 23 satisfies clause 25(4A) of Schedule 1 of the RMA and that PC 23 is consistent with the changes being sought to the Operative Christchurch District Plan (the CDP) via PC 14.

### **Requirement of a territorial authority to apply the MDRS**

- 8 Clause 25(4A) of Schedule 1 of the RMA requires that a specified territorial authority must not accept or adopt a private plan change if it does not incorporate the MDRS as required by section 77G(1). The MDRS to be incorporated by specified territorial authorities is set out in Schedule 3A of the RMA.
- 9 Section 77G(6) allows a territorial authority to make the MDRS less enabling of development if authorised to do so under section 77I. Section 77I provides that the MDRS may be less enabling of development in relation to an area within a relevant residential zone to the extent necessary to accommodate qualifying matters, including:
  - 9.1 a matter of national importance that decision makers are required to recognise and provide for under section 6 (77I(a));
  - 9.2 open space provided for public use, but only in relation to land that is open space (77I(f)); and
  - 9.3 any other matter that makes higher density, as provided for by the MDRS or policy 3, inappropriate in an area, but only if section 77L is satisfied (77I(j)).

### **Qualifying Matters applicable to PC23**

- 10 The Site is subject to a number of constraints. QMs have been identified under s 77I(a), 77I(f) and 77I(j) of the RMA, which require PC 23 to be less enabling of development than what is provided for under the MDRS. These QMs have been discussed in detail below and are supported by a section 32 Addendum attached in **Appendix One**.



- 11 These QMs / similar QMs were identified as QMs through the Council's proposed housing and business choice plan change (*PC 14*). Further, it is considered that the proposed zoning of the PC 23 area is appropriate and consistent with the PC 14 decision.

***Matters of national importance that decision makers are required to recognise and provide for under section 6 (77I(a))***

- 12 Section 77I(a) provides for the identification of QMs for matters of national importance that are required to be provided for under section 6 of the RMA. Matters of national significance under section 6 of the RMA include the management of significant risks from natural hazards.<sup>2</sup>
- 13 As stated in **Appendix One**, for PC 23:
- 13.1 The lower terrace area shown as open space is subject to the High Flood Hazard Management Area, Flood Ponding Management Area and the Flood Management Area under the operative Christchurch District Plan, which applies an associated suite of rules that make the establishment of a sensitive activity (including residential dwellings) a non-complying activity).
- 13.2 Large portions of the upper terrace are subject to the Flood Management Area Overlay and the Fixed Minimum Floor Level Overlay within the Flood Management Area Overlay that makes some level of urban development appropriate (and is anticipated in the operative SP Golf Resort Zone provisions), subject to achieving the finished floor levels identified in Council's modelling.
- 14 During PC 14, as set out in the Council legal submissions<sup>3</sup> and evidence<sup>4</sup> the high flooding hazard areas (i.e. High Flood Hazard Management Area and the Flood Ponding Management Area) were identified as a matter of national importance, that supports a less enabling application of the MDRS, in order to ensure appropriate development does not occur within these natural hazard risk areas. The Panel recommended that the High Flood Hazard Management Area and Flood Ponding Management Area be accepted as QMs without change.<sup>5</sup>
- 15 The flood hazard risk on the lower terrace of the PC 23 Site is an identified QM, accepted by the CCC, such that urban development of any sort (including under the MDRS) is effectively precluded.

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<sup>2</sup> Resource Management Act 1991, s 6(h).

<sup>3</sup> Council Legal submissions - City Wide Qualifying Matters, 11 October 2023 at [13.1] – [13.12].

<sup>4</sup> Section 42A Report of Brittany Ratka, 11 August 2023, at [9.4.1] - [9.4.8] and [9.4.10] – [9.4.40] and Statement of Evidence of Brian Norton, 11 August 2023.

<sup>5</sup> Recommendations Report: Part 5 – City Wide Qualifying Matters at [46].



***Open space provided for public use, but only in relation to land that is open space (77I(f))***

- 16 Section 77I(f) provides for the identification of QMs that provide open space for public use.
- 17 As stated in **Appendix One**, for PC 23:
- 17.1 Portions of the lower terrace are anticipated to be vested in the Council for open space purposes, namely the Styx River margins located within the Open Space Waterways and Margins Zone, along with an associated walkway link as shown on the ODP.
- 17.2 Extensive areas immediately south of the upper terrace development area are also required for stormwater treatment and attenuation. It is anticipated that these areas will be vested in the Council as utility reserves and will be available for passive recreation and public access as open space areas.
- 18 During PC 14, as set out in the Council legal submissions<sup>6</sup> and evidence<sup>7</sup> the Open Space Zones<sup>8</sup> are recognised as a QM in order to protect the values of open space from inappropriate subdivision, use and development. The Panel accepted the recommendation that the existing Open Space Zones (including the Open Space Water and Margins Zone (*OSWMZ*)) provisions and mapping in the ODP be accepted as a QM.<sup>9</sup>
- 19 Whilst PC 23 does not alter the existing *OSWMZ* along the river, it is noted that the remainder of the lower terrace will be zoned RNN, rather than as an open space zone. Notwithstanding this zoning, the Outline Development Plan (*ODP*) identifies the lower terrace as open space, with public access anticipated on walkways and stormwater basins. Development within this area is required to be in general accordance with the ODP. As a result, although certain areas of the lower terrace—such as the stormwater basins—are not zoned as open space, the rule framework established by the ODP effectively requires these areas to be developed and maintained as publicly accessible open space. This ensures that the outcome is consistent with situations where CCC has considered a QM. It is also relevant to note that the legislation refers to ‘open space’ rather than specifically to an ‘open space zone’.
- 20 Open space provided within the PC 23 Site is an identified QM, accepted by the CCC, such that urban development under the MDRS is precluded.

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<sup>6</sup> Council Legal submissions - City Wide Qualifying Matters, 11 October 2023 at [9.1] – [9.10].

<sup>7</sup> Section 42A Report of Anita Hansbury, 11 August 2023 at [6.22.1] – [6.22.7]

<sup>8</sup> The existing Open Space Zones provisions set out in Chapter 18 of the ODP.

<sup>9</sup> Recommendations Report: Part 5 – City Wide Qualifying Matters at [513].



***Matters that make higher density, as provided for by the MDRS or policy 3, inappropriate in an area, but only if section 77L is satisfied (77I(j))***

- 21 Section 77I(j) is a catch-all provision that enables the identification of QMs outside of the criteria outlined in s 77I(a)-(j), so long as s 77L is satisfied.
- 22 An assessment against the criteria of s 77L is provided in **Appendix One**. In summary, the characteristics of the Site (identified within an Infrastructure Report) make the higher density, as provided for by the MDRS or Policy 3, inappropriate in the PC 23 area. The overall yield of the PC 23 area is required to be capped at 800 dwellings to provide certainty regarding the size of the proposed water supply system.
- 23 In PC 14, QMs were identified under 77I(j) in similar circumstances. Although some intensification was potentially feasible in greenfield RNN areas, for the most part, the Three Waters infrastructure was constructed to service these areas, which were sized according to the zoning as per the District Plan. It was concluded that upgrading the infrastructure would not be cost-effective or economically feasible.<sup>10</sup>
- 24 Further, the application of the MDRS to unbuilt RNN locations was carefully assessed by the Council through PC14, with the Council concluding that RNN (Or a Future Urban Zone (*FUZ*) labelled with RNN rules) was the appropriate zone for these areas. PC23 seeks to retain consistency with this long-established approach to greenfield land development.
- 25 It is not considered that this will have any substantive impact, as PC 14 is simply a relabelling exercise, changing the RNN) zone to the FUZ. Should PC 14 be implemented and the relabelling take effect, for example in November, the only change required would be to update the zone label in our application accordingly. All other aspects would remain unchanged. This constitutes an administrative amendment rather than a material change to the provisions or the outcomes sought.
- 26 As outlined in **Appendix One**, the adoption of the well-proven RNN provisions provides a more settled and purpose-designed framework for a new growth area,

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<sup>10</sup> Section 32 [6.32.21].



rather than having to retrofit the RNN provisions relating to subdivision construction-phase and ODP alignment into the MDRS zone framework for this site.

Yours sincerely

Jo Appleyard / Tallulah Parker

Partner / Senior Solicitor



**Appendix One: PC23 – Section 32 Addendum**

## **PC23 - SECTION 32 ADDENDUM**

This Section 32 evaluation of the amendments sought to the Christchurch District Plan via PC23 is provided further to the S32 assessment that underpinned the application. The focus of this addendum is in response to Matter 1 raised in the Request for Further Information (**RFI**) issued by Council on 11 June 2025. It focusses on the requirement under Clause 25(4A), Schedule 1 and S77G(1) that states that "a specified territorial authority must not accept or adopt a request if it does not incorporate the MDRS as required in section 77G(1)". PC23 seeks a Residential New Neighbourhood (**RNN**) Zone for the site.

S77G(6) permits a territorial authority to make the requirements set out in Schedule 3A (MDRS Standards) less enabling if authorised to do so under S77I i.e. it is necessary to accommodate 'qualifying matters' under S77I.

The matters set out in S77I of relevance to PC23 include:

***(a) A matter of national importance that decision makers are required to recognise and provide for under section 6.***

For PC23, the lower terrace area shown as open space on the Operative District Plan is subject to high flood hazard risks. The management of significant risks from natural hazards is a matter of national importance under s6(h). The District Plan includes a series of flood hazard overlays, including the Flood Hazard Management Area and the Flood Ponding Management Area Overlay, that apply to the lower terrace with an associated suite of rules that make the establishment of a sensitive activity (including residential dwellings) a non-complying activity.

Large portions of the upper terrace are alternatively subject to a reduced level of flood risk (Flood Management Area Overlay and Fixed Minimum Floor Level Overlay within the Flood Management Area Overlay) that makes some level of urban development appropriate (and is anticipated in the operative SP Golf Resort Zone provisions). Such development is however subject to the need to achieve finished floor levels identified in Council modelling. It is also subject to limitations on the amount of fill and the concurrent need to maintain flood capacity which precludes widespread medium density housing typologies. Smaller areas of medium density housing are however able to be established close to high amenity areas such as locations with outlook over open space areas, as identified in the ODP narrative.

In short, the flood hazard risk on the lower terrace is such that urban development of any sort is effectively precluded. The reduced flood hazard risk on the upper terrace, whilst remaining as a qualifying matter, means that some level of urban development

is appropriate subject to the need to manage density in line with RNN rather than MDRS levels of enablement;

***(f) Open space proceed for public use, but only in relation to land that is open space.***

For PC23 this includes those portions of the lower terrace where it is anticipated that the land will be vested in Council for open space purposes, namely the Styx River margins located within the Open Space Waterways and Margins Zone, along with and associated walkway links as shown on the ODP. Extensive areas immediately south of the upper terrace development area are also required for stormwater treatment and attenuation. It is anticipated that these areas will be vested in Council as utility reserves and will be available for passive recreation and public access as open space areas;

***(j) Any other matter that makes higher density, as provided for by the MDRS or policy 3, inappropriate in an area, but only if section 77L.***

For PC23 this includes significant capacity constraints for both wastewater and potable water supply. These infrastructure capacity constraints are the primary limitation on delivering MDRS yields across the upper terrace development area.

Under 77L, a matter is not a qualifying matter under section 77I(j) in relation to an area unless the evaluation report referred to in section 32 also includes a number of requirements. This assessment is included below and serves as an addendum to Section 32 of the Addendum.

**S77L Assessment – Section 32 Addendum**

***Identified specific characteristics that make the level of development provided by the MDRS (as specified in the Schedule 3A or provided for by policy 3) inappropriate in the area (77L(a))***

The characteristics of the Site that make the level of development provided by the MDRS inappropriate include those matters identified above in under 77L(a), (f) and (j).

Additionally, characteristics of the Site have been identified within an Infrastructure Report (Appendix B to the application), including servicing and infrastructure restraints that make the level of development provided by the MDRS inappropriate. These issues arise as:

- there is no existing potable water capacity in the wider network, and therefore the site will need to provide its own solution to water supply in terms of both volume and quality.
- for wastewater, high groundwater levels require a local pressure sewer network, with each dwelling needing its own tank and pump installed at the time of building consent. This system is not suitable for ad hoc infill development.

Despite these concerns, the proposed solution is to sink a new bore of sufficient depth to manage water quality risks. On-site treatment is required for all community drinking water supply schemes, with an on-site treatment and chlorination plant also proposed. The overall yield of the plan change area is therefore capped at no more than 800 dwellings to provide certainty regarding the size that the proposed water supply system is to be designed to.

*Justification for why the characteristics make the level of development inappropriate in light of the national significance of urban development and the objectives of the NPS-UD (s 77L(b))*

An analysis of why the proposed qualifying matter is incompatible with the level of development permitted by the MDRS under s77L(a) and (b) requires the evaluation report to identify and justify specific characteristics that make the level of development inappropriate.

Technical analysis has identified that the level of development permitted by the MDRS or as provided for by Policy 3 of the NPS-UD would be inappropriate on the PC 23 Site (discussed further below). The bespoke water supply system and associated treatment facility prohibit the development of no more than 800 dwellings. Otherwise, progressing with the intensification direction would result in a negative result (see further assessment below).

An assessment of PC 23 against the objectives and policies of the NPS-UD has been included in the application, and economic evidence has concluded that the PC 23 is significant in the context of Policy 8 of the NPS-UD. An evaluation of the QM in light of the objective of the NPS-UD is provided below.

<b>Assessment of relevant objectives of the NPS-UD</b>	
<b>Relevant Objective</b>	<b>Qualifying matter compatibility</b>
<b>Objective 1:</b> 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.	The values associated with this QM contribute to the wellbeing of the community and to a well-functioning urban environment. Development permitted by the MDRS or as provided for by Policy 3 of the NPS-UD would compromise these values.

<p><b>Objective 2:</b> Planning decisions improve housing affordability by supporting competitive land and development markets.</p>	<p>The loss of development capacity from this QM (i.e. water supply constraints) being identified will have a limited impact on the overall opportunities for residential intensification of wider Christchurch (i.e. it is site specific) and will not impact the competitive land and development market.</p>
<p><b>Objective 3:</b> 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:</p> <ul style="list-style-type: none"> <li>a) the area is in or near a centre zone or other area with many employment opportunities</li> <li>b) the area is well-served by existing or planned public transport</li> <li>c) there is high demand for housing or for business land in the area, relative to other areas within the urban environment.</li> </ul>	<p>Applying the MDRS to enable medium-density residential development in areas with water supply and infrastructure constraints is considered inappropriate and incompatible with achieving part (c) of this objective, as whilst there is high demand for housing in this area, the NPS-UD objectives need to be read together and the area is not well-served by the infrastructure necessary to enable housing to MDRS densities.</p>
<p><b>Objective 4:</b> 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.</p>	<p>The proposed QM is not based on the protection of amenity values and is consistent with objective 4 in that Christchurch’s urban environment will be enabled to change over time in response to a range of current and future needs.</p>
<p><b>Objective 5:</b> Planning decisions relating to urban environments, and FDSs, take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).</p>	<p>Implementation of the proposed QM is not incompatible or inappropriate in light of Objective 5 and the principles of Te Tiriti o Waitangi.</p> <p>An assessment of PC 23 and the cultural effects associated with the Plan Change is included in the application.</p>
<p><b>Objective 6:</b> Local authority decisions on urban development that affect urban environments are:</p> <ul style="list-style-type: none"> <li>a) integrated with infrastructure planning and funding decisions; and</li> <li>b) strategic over the medium term and long term; and</li> <li>c) responsive, particularly in relation to proposals that would supply significant development capacity</li> </ul>	<p>Regarding clause (a), infrastructure planning and associated funding decisions that affect urban environments are based on medium-density residential development and intensification occurring in the locations currently zoned in the District Plan and planned growth areas (i.e. where existing infrastructure provides for).</p> <p>Although no doubt removing the QM would add significantly to development capacity, overall, it is considered that applying MDRS to the proposed QM area is inappropriate and incompatible with objective 6 as the densities enabled by MDRS would not align with the ability of the infrastructure capacity to service that development.</p>
<p><b>Objective 7:</b> Local authorities have robust and frequently updated information about their urban environments and use it to inform planning decisions.</p>	<p>The Council has up-to-date and robust information about the urban environment within the PC 23 area (as provided by the application). Medium Density Residential development under the MDRS within this proposed QM area (i.e. PC 23 area), is neither incompatible with the QM nor inappropriate in the light of objective 7.</p>

<p><b>Objective 8:</b> New Zealand’s urban environments:</p> <ul style="list-style-type: none"> <li>a) support reductions in greenhouse gas emissions; and</li> <li>b) are resilient to the current and future effects of climate change</li> </ul>	<p>Medium Density Residential development under the MDRS within this proposed QM area (i.e. PC 23 area), is neither incompatible with the QM nor inappropriate in the light of objective 8.</p>
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*Inclusion of a site-specific analysis that identified the site to which the matter relates (77L(c)(i))*

The site to which the matter relates is identified in Appendix F of the PC23 application.

*Inclusion of a site-specific analysis that evaluates the specific characteristic on a site-specific basis to determine the geographic area where intensification needs to be compatible with the specific matter (77L(c)(ii))*

The ability to service the site has been undertaken through a site-specific assessment set out in an Infrastructure Report (Appendix B to the application). In relation to water supply this report concluded that:

*“there is no existing potable water capacity in the wider network, and therefore the site will need to provide its own solution to water supply in terms of both volume and quality. The proposed solution is to sink a new bore of sufficient depth to manage water quality risks. On-site treatment is now required for all community drinking water supply schemes, with an on-site treatment and chlorination plant also proposed. The creation of new bores and associated treatment plants are able to draw on proven solutions and common technology. As such, the provision of a suitable potable water supply is considered to be plausible and does not present a barrier to the site being rezoned.”*

Because the water supply system is bespoke to the site rather than forming part of the wider reticulated network, the size/ capacity of the water take and associated treatment facility needs to be identified at the outset, with the size of the facility determined by the number of households the infrastructure will be servicing. Such identification is not possible under MDRS provisions given the high theoretical ‘upper limit’ of housing enabled by the MDRS provisions. The overall yield of the plan change area is therefore capped at no more than 800 dwellings to provide certainty regarding the size that the proposed water supply system is to be designed to.

In relation to sewer, the report identified that wastewater would be connected to the Council’s reticulated network and treated at the Bromley sewage treatment plant. Due to high ground water across much of the site, it is proposed that the development will be serviced by a ‘Local Pressure Network’. Each new home will have a simplex tank and pump which will be installed at the time of building consent and will not be part of the subdivision process. A consent notice on the title of each lot is expected to detail this. A local pressure system requires the associated per-lot tank and pump to be established as the dwellings are built, and makes ad hoc infill development (common with NDRS)

challenging to service. It is understood that a similar sewer system in Aranui was identified by Council in PC14 as being a key qualifying matter that precluded the application of MDRS across the area served by such a system.

Each site will then pump to a common rising main that will connect to the Council's existing network in Spencerville. Council modelling confirmed that, with the addition of the development (at 800 households), the downstream pump station PS78 will be at capacity, subject to maintenance being first undertaken on the pump station to improve its performance.

As such, sewer capacity is constrained due to a combination of the high ground water on the site necessitating a local pressure network design, and pump station capacity constraints beyond 800 households, meaning that further yield facilitated by MDRS is not possible. As such S77J and the associated tests under s77L are considered to be met.

The geographical extent of the qualifying matter applies to the site in its entirety. While the constraint may extend beyond the site to the wider catchment, given the plan change proposal is the only one in the catchment, the evaluation is focused exclusively on the site.

*Inclusion of a site-specific analysis evaluates an appropriate range of options to achieve the greatest heights and densities permitted by the MDRS (as specified in Schedule 3A) or as provided for by policy 3 while managing the specific characteristics (77L(c)(iii))*

While the RNN Zone does not include the MDRS, it does provide for 'comprehensive residential development' which the District Plan defines as:

*... means a development of three or more residential units which have been, or will be, designed, consented and constructed in an integrated manner (staged development is not precluded). It may include a concurrent or subsequent subdivision component.*

*The key QM constraint to achieving MDRS densities on the upper terrace development area is in regard to water supply capacity i.e. a total housing cap of 800 residential units. The RNN provisions enable a good level of flexibility for delivering a range of housing typologies and densities within the overall cap imposed by the QM. Rule 14.12.1.3(RD5) enables comprehensive housing developments subject to a proposal-specific assessment of their design qualities (in a similar manner to the assessment required for more than 3 units under MDRS). RNN therefore enables medium density housing forms, however this is undertaken as part of the subdivision process in a carefully managed way to ensure that the total quantum of housing across the plan change area does not exceed the infrastructure capacity limits imposed by the QM. This approach is consistent with the Council's assessment of the RNN rule package under PC14.*

**Plan integrity – Good Planning Practice**

Whilst not a matter that explicitly falls under S77J, consistent zoning and regulatory approaches to land with similar characteristics, roles, and functions underpins good District Plan drafting i.e. an efficiency assessment under S32. Council has long utilised the RNN zone and associated policy and rule framework for managing outcomes for greenfield residential development areas. The application of MDRS to unbuilt RNN locations was carefully assessed by Council through PC14, with Council concluding that RNN (or a Future Urban Zone label with RNN rules) was the appropriate zone for these areas. PC23 seeks to retain consistency with this long-established approach to greenfield land development. As a purpose designed zone for greenfield areas, the RNN policy and rule framework is explicitly designed to manage the design and construction of new subdivisions. The MDRS provisions are conversely designed primarily for an infill context where redevelopment occurs in an ad hoc manner. As such, adoption of the well-proven RNN provisions provides a more settled and purpose-designed framework for a new growth area, rather than having to retrofit the RNN provisions relating to subdivision construction-phase and ODP alignment into the MDRS zone framework for this site.

<p>Effectiveness and efficiency</p>	<ul style="list-style-type: none"> <li>• The Utilisation of the RNN framework is more efficient in that it is purpose-designed for managing effects associated with greenfield land development and subdivision design.</li> <li>• The RNN provisions are well-proven for delivering outcomes for greenfield areas and as such are a more effective tool than the application of MDRS which has not been designed for this context.</li> <li>• Utilisation of RNN and the associated qualifying matters is effective at aligning household yield with infrastructure provision. MDRS would not be effective in managing infrastructure demand as the provisions would enable a much higher yield than the infrastructure is capable of servicing.</li> <li>• Utilisation of RNN is a more effective tool for managing flood plain capacity and the intensity of development on the upper terrace than adoption of MDRS standards as a lower yield enables more floodplain capacity to be retained.</li> </ul>
<p>Benefits of retaining RNN/</p>	<ul style="list-style-type: none"> <li>• RNN enables the yield to be right-sized to infrastructure provision (economic).</li> </ul>

applying QMs to MDRS	<ul style="list-style-type: none"> <li>RNN enables the extensive open space area located within a flood hazard area to be retained as open space with both open space benefits and the benefits of hazard mitigation (Economic, social, environmental).</li> </ul>
Costs	<ul style="list-style-type: none"> <li>There are no costs to RNN over MDRS as limits on yield are determined by servicing rather than planning policy i.e. even if it was rezoned to MDRS, household yield would still be limited to 800 units (economic).</li> <li>Use of MDRS would instead impose economic and environmental costs through enabling the development of housing in an area exposed to flood hazard risks that are unable to be effectively mitigated.</li> <li>Use of MDRS would result in the risk of more houses being developed than the infrastructure network could cope with, resulting in wastewater overflows and associated economic and environmental costs.</li> </ul>
Overall conclusion on costs and benefits	<ul style="list-style-type: none"> <li>It is considered that the benefits of utilising the RNN zone framework due to the presence of MDRS qualifying matters clearly outweigh the costs.</li> </ul>
Risk of acting or not acting	<ul style="list-style-type: none"> <li>The risk of acting (adopting MDRS) is that intensification occurs in hazard-prone locations that cannot be efficiently serviced.</li> <li>The risk of not acting (retaining RNN as sought in PC23) is that hazard risk is able to be appropriately mitigated, open space areas provided, and household yield matched with the provision of sufficient infrastructure capacity.</li> </ul>
Decision about more appropriate	<ul style="list-style-type: none"> <li>Retention of the RNN framework as sought in the PC23 application is therefore considered to be more appropriate in achieving the purpose of the RMA than the adoption of MDRS in a location that is subject to a number of qualifying matters.</li> </ul>