

28 August 2025

Christchurch City Council
c/- Craig Friedel
Consultant Planner

Email: c.friedel@harrisingrierson.com

Dear Craig

Subject: PC23, 240 Spencerville Rd – Second Request for Further Information

Thank you for your follow-up letter dated 6th August 2025 that sets out remaining matters requiring further assessment following your review of the applicant's response to your first Request for Further Information (RFI) response. Our response to your 6th August letter is set out below, with the numbering aligned with the corresponding RFI matter:

1. Neighbourhood Commercial Zone

The Proposal and associated ODP include an indicative location for a 'small scale community and commercial node'. The ODP narrative likewise includes commentary that the size of commercial activities within the node should not exceed 3,000m² GFA. The GFA limit aligns with the policy guide for the size of Neighbourhood Centre Zones (NCZ) set out in Policy 15.2.2.1 and Table 15.1 of the District Plan. The size limit is also aligned with the updated economic assessment on this matter provided as part of the original RFI response.

You have raised concerns regarding how the proposed node is to be provided for in the District Plan rule framework, noting that it is not proposed to be zoned as NCZ and that the RNN activity rules only provide for commercial activity as a fully discretionary activity (14.12.1.4(D1)). The concerns raised are acknowledged as a matter requiring resolution. Two options have been considered:

- a) Rezone the node to NCZ. This option provides a direct link to the appropriate policy and rule framework that is designed to manage small neighbourhood centres. This option does however come with a significant challenge in that it 'sets in stone' the exact location of the NCZ boundaries. In practice, the specific location of the commercial node boundaries is a matter that will only be resolved following detailed design as part of a subdivision process. Whilst a neighbourhood centre is anticipated to be located in general accordance with the area shown on the ODP, the exact zone boundaries are not able to be accurately defined at this point in time. As such, rezoning to NCZ is not the preferred option.
- b) A second option is to Include a rule in the subdivision chapter requiring that lots located in general accordance with the community hub shown on the ODP and that are intended to be developed for commercial purposes have a consent notice registered on their titles stating that the lots are subject to the NCZ rule framework. A reciprocal rule would be added to the RNN rule framework that activities on the lots identified via consent notice are subject to the NCZ rules. This approach is well-established and has been a common feature of ODPs in Selwyn District for a number of years. It was introduced in Selwyn specifically to overcome the exact issues highlighted in option (a) above where commercial zoning of small pockets of land in large greenfield residential areas has proven to be an ineffective method as the zone boundaries invariably did not line up with the final subdivision plan.

The Plan Change text has therefore been amended to introduce additional commentary to the ODP narrative, a new rule to the subdivision chapter, and a new rule to the RNN Zone. The rule wording and approach is modelled on the proven approach utilised in the Selwyn District Plan.

2. Zoning of the lower terrace

The Proposal sought to mirror the operative SP Golf Zone approach of zoning the entire development area with a single zone (in this case RNN). The development limitations of the lower terrace due to high flood hazard risks have always been recognised, with development in this area subject to the Chapter 5 rules controlling hazard risks, and the ODP specifically showing the lower terrace as some sort of open space use with housing confined to the upper terrace development area. It is however acknowledged that showing a large area of known hazard-prone land as having a RNN Zoning is potentially problematic in terms of clearly communicating the outcomes anticipated for the lower terrace. Upon reflection, the applicant has decided to limit the RNN Zone to the upper terrace Development Area and the adjacent land between the Development Area and Spencerville Drain which is to be used for urban parks and stormwater basins associated with the Development Area. The inclusion of the urban parks and stormwater basin area in the RNN Zone is to again avoid the issues created by a 'set in stone' RNN zone boundary along the terrace edge where the exact boundaries of the area utilised for residential housing will only be determined following detailed design as part of subdivision. The inclusion of areas utilised for urban parks and stormwater basins is however a common feature of most large RNN ODP areas.

The balance of the site located between Spencerville Drain and the Styx River OSWM Zone is now proposed to be Rural Urban Fringe Zone. The ODP has been updated to also differentiate the intended purpose of these areas.

This change more clearly communicates the intention that the lower terrace area is not to be developed for housing, with the RuFZ provisions still providing a pathway for environmental restoration, open space recreation and walking trails, and farming. Following feedback from Council on this change in approach, if the use of the RuFZ is acceptable then the s32 assessment will also be updated to capture the change and to reflect that the Proposal now includes a RuFZ component.

3. Qualifying Matters (QMs)

Following the Council's partial acceptance of the 'Policy 3' aspects of the Independent Hearing Panel recommendations on PC14, it has been noted that the District Plan maps have been updated through the addition of a new 'Qualifying Matters' tab. This tab provides a spatial overlay that shows the geographic extent of qualifying matters, insofar as they relate to Policy 3 areas. Because the plan change seeks to rezone the Site to a 'relevant residential zone', an assessment of qualifying matters under s77G(1) RMA is necessary. The applicant has provided this assessment previously, with Council acceptance received confirming that the Site is subject to QMs and that as such rezoning to RNN rather than MRZ is an available option.

A consequence of the proposed rezoning being subject to the presence of QMs is that the graphic illustration of these QMs therefore also needs to be added as an amendment to the planning maps under the Qualifying Matters tab. Two QMs are identified for the RNN portion of the site, namely a waste water constraint QM that applies to the whole of the RNN zoned area, and a High Flood Hazard QM that applies to a portion of the RNN Zoned area and that is largely anticipated to be utilised for stormwater basins and urban parks.

The Plan Change Graphic Attachment and associated Appendix that sets out the Plan amendments has accordingly been updated through the addition of a Qualifying Matter map. This map has been undertaken in a manner consistent with how Policy 3 area qualifying matters have been mapped, namely that the QM is only shown insofar as it relates to the residential zone/ Policy 3 area in question (and therefore QMs are not mapped over the RuFZ or OSWMZ). The plan change map 'QM Tab' therefore shows the QMs applying to the RNN zoned portion of the Site, rather than to the entire Site.

4. ODP and associated narrative

The suggested text changes to the ODP narrative provided by Council have been carefully considered. These amendments generally improve clarity and provide important commentary regarding the overall yield of 800 residential units and the application of the Chapter 5 rules relating to high flood hazard. A revised set of Plan amendments is attached. New text is shown in green underline. Unless shown in green strikethrough (with an explanatory comment box), the amendments put forward by Council in blue text are accepted. Once the text changes have been reviewed by Council it is anticipated that a 'clean' version will be provided with the plan change documentation for notification.

Two attachments are provided with this letter, namely an updated Appendix of the District Plan amendments, and an updated Graphic attachment that includes the revised ODP, zoning map, and QM map.

Please feel free to give me a call on 022 170 0204 if you would like to discuss any of the above in more detail.

Kind Regards

PLANZ CONSULTANTS LTD

A handwritten signature in blue ink, appearing to read 'Jonathan Clease', with a stylized flourish at the end.

Jonathan Clease

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