

6 August 2025 03 941 6262

53 Hereford Street Christchurch 8013

PO Box 73012 Christchurch 8154

ccc.govt.nz

LMM Investments 2012 c/- Jonathon Clease, Director Planz Consultants

Attn: Jono Clease, <u>jonathon@planzconsultants.co.nz</u>

Dear Jonathon,

This letter relates to Private Plan Change 23 (PC23), which is a proposal to rezone the properties generally located at 144, 156 and 176 Turners Road and 220 and 240 Spencerville Road, Marshlands from a Specific Purpose (Golf Resort) Zone and Rural Urban Fringe (RUF) Zone to a Residential New Neighbourhood (RNN) Zone.

In accordance with clause 23 (2) of Schedule 1 of the Resource Management Act (RMA) the Christchurch City CCC (CCC) requests that additional further information is provided. This follows the proponent's letters dated 7 and 29 July 2025 that provide responses to the Requests for Further Information issued on 11 and 23 June 2025 in accordance with clause 23 (1) of Schedule 1. The additional further information detailed in this letter is required to enable the CCC to better understand the nature of the request, including confirming the zoning that is being sought and its consistency with the operative provisions of the Christchurch District Plan (CDP).

I confirm that most of the initial RFI responses provide an adequate understanding of what is being sought to enable a decision under RMA Schedule 1 clause 25. The exception relates to the zoning pattern that is being sought and some of suggested changes contained in the Appendix K Outline Development Plan (ODP).

I appreciated the opportunity to meet with you on 5 August 2025 to outline the context of these further RFI items. Additional information may be sought with respect to the proponent's legal advice and supporting section 32 analysis relating to whether the MDRS standards are being applied to the PC23 provisions (initial RFI item 1) once CCC's internal reviews are completed.

Proposed Zoning

Neighbourhood Commercial Zone

1) The proponent's RFI response included an addendum assessment from Insight Economics that substantiates the need for the commercial centre identified in the Appendix K ODP, while clarifying that a 3,000m² GFA is now sought. The proposed changes to the CDP Planning Map in Appendix K of PC23 do not seek to zone this portion of the Residential New Neighbourhood Zone (RNNZ) as a Neighbourhood Commercial Zone (NCZ). However, this is considered necessary as the RNNZ does not support the development and operation of commercial activities at this scale unless through a discretionary activity resource consent.¹ This potentially restrictive consenting pathway may hinder the commercial centre from establishing if the rezoning is supported, which may give rise to greater car dependency as residents will need to travel further distances to meet their retail convenience needs. I acknowledge that the proponent may not have established the optimal location for the commercial centre at this point and that repositioning it later can create consenting complexities if it isn't within an identified NCZ boundary. If this remains a concern, then consideration of a site-specific rule or ODP development requirement, or an alternative method for providing certainty that the commercial centre will be enabled, may be necessary to meet the PC23 objective.

The CCC requests that the proponent evaluates the need for a NCZ to facilitate the development of the commercial centre and make any necessary amendments to the Planning Map contained in Appendix K of PC23.



¹ Chapter 14 Residential, rule 14.12.1.4 D1.



Residential New Neighbourhood Zone

- 2) The proponent is seeking that a RNNZ is applied to the lower terrace portion of the site that is subject to the "Wetland, Recreational, Open Space" development requirement in the PC23 ODP in Appendix K. It is understood from a review of PC23 that this zoning is preferred as the RNNZ achieves the following key objectives:
 - a. Enables the future rural, recreation and ecological restoration activities;²
 - b. The proponent considers that there are sufficient development controls in the ODP narrative to avoid residential units from being developed in the future; and
 - c. It prevents the challenges in mapping the zone boundary.

However, I am not aware of any other RNNZs in the CDP that do not enable some form of housing to occur due to constraints, which are typically managed through alternative zonings.³ Consequently, the application of the RNNZ under these circumstances may create a precedent for future rezonings and present challenges in the administration of the CDP. A more detailed assessment of why the RNNZ is the most appropriate zone is considered necessary, including whether there are sufficient controls in place within the PC23 provisions to avoid housing from being developed within the lower terrace. For completeness, I do not consider alternative zones that manage the density of housing to avoid natural hazard constraints⁴ are appropriate under the circumstances given that the lower terrace is subject to the High Flood Hazard Management Areas (HFHMA).

The CCC requests that the proponent provides a more detailed analysis of why a RNNZ to manage the future subdivision and development of the lower terrace portion of the site is the most appropriate in comparison to the operative zoning. Your response should include an evaluation of what additional amendments are required to the ODP plan and/or development requirements to provide certainty that housing will be avoided within the lower terrace. For example, references to the relevant Chapter 5 Natural Hazards provisions,⁵ or a supplementary overlay illustrating the extent of the HFHMA.

Qualifying Matters

3) The RFI response dated 29 July 2025 included legal advice and an updated section evaluation that lists several qualifying matters that preclude the Medium Density Residential Standards (MDRS) from being applied to the rezoning pursuant to section 77G (1) of the RMA. However, the identified qualifying matters have not been illustrated on the CDP Planning Maps to enable the spatial extent of these constraints to be determined and evaluated.

The CCC requests that the proponent amends the Qualifying Matters Maps to record the constraints that apply to the PC23 site, as they now form part of the CDP following decisions being released on Plan Change 14.

Outline Development Plan

Schedule of amendments

- 4) The review of the initial RFI responses has identified opportunities for the PC23 schedule of amendments in Attachment K to be amended to provide greater certainty that the plan change objective will be achieved. **Appendix 1** of this RFI includes an edited schedule of amendments for your consideration. While some of these aim to provide greater certainty to assist in the ongoing administration of the CDP, the following suggested amendments are more fundamental and need to be addressed before a decision on how to process PC23 is made:⁶
 - a. The infrastructure servicing constraints and maximum 800 household yield do not appear to have been recorded in the PC23 schedule of amendments. These are critical to supporting the MDRS qualifying matters and for managing the yield to reduce the risk that the lower terrace could accommodate residential housing in the future.



² Chapter 14 Residential, Rule 14.12 Rules – Residential New Neighbourhood Zone, P21.

³ For example, the Open Space Natural (OPN), Open Space Water and Margins (OSWM) Zones.

⁴ For example, the Rural Urban Fringe (RuF) Zone or the Specific Purpose (Whisper Creek) Golf Resort Zone.

⁵ Including the listed 5.4.6.3 Non-complying activities within the HFHMA.

⁶ Pursuant to RMA clause 25 of Schedule 1.



b. References to the Chapter 5 Natural Hazards provisions that avoid residential development in the High Flood Hazard Area.

Please consider the suggested edits to the schedule of amendments contained in **Appendix 1** and provide a final version to replace the current iteration of Appendix K.

If the applicant declines under clause 23(5) of Schedule 1 of the RMA to provide further information, the CCC may at any time reject the request or decide not to approve the plan change requested for public notification, if it considers that it has insufficient information to enable it to consider how to deal with the request under clause 25 of Schedule 1.

Please do not hesitate to email Craig Friedel, Consultant Planner (<u>c.friedel@harrisongrierson.com</u>) if any clarification on the above further information request points is needed to facilitate a response. The CCC is happy to engage with the proponent, where appropriate, to enable the Private Plan Change request to be processed in a timely manner.

Kind regards,

Craig Friedel Consultant Planner 021 575 607





APPENDIX 1

Suggested Edits to the PC23 Appendix K Schedule of Amendments

The proponent's original amendments to the operative CDP are recorded as additions and deletions.

The proponents' amendments in response to the initial RFI are recorded as comments, additions and deletions.

CCC's suggested edits are recorded as additions and deletions.

Whisper Creek Plan Change – Christchurch District Plan Amendments

Overview of proposed text changes

The proposed amendments to the District Plan seek to remove the site from the Specific Purpose (Golf Resort) Zone provisions, with consequential grammatical amendments so the zone provisions relate only to the Clearwater Resort. Deletion of references to Whisper Creek golf resort provisions is also necessary in the Subdivision Chapter.

The addition of a replacement Outline Development Plan is proposed to Chapter 8, so that the ODP is located along with other RNN zoned ODPs. The ODP also includes an accompanying narrative that follows the same format and level of detail as other RNN greenfield development ODPs.

For completeness, no amendments are proposed to the Operative RNN zone policies or rules, either in Chapter 14, or where the RNN Zone is referenced in Chapter 8. The operative RNN provisions are considered to provide a robust and effective framework for managing development outcomes for the Whisper Creek site.

Chapter 13 Specific Purpose Zones

13.9 Specific Purpose (Golf Resort) Zone

13.9.1 Introduction

- a. This introduction is to assist the lay reader to understand how this chapter works and what it applies to. It is not an aid to interpretation in a legal sense.
- b. The Specific Purpose (Golf Resort) Zone applies to the existing Clearwater Golf Resort and the proposed Whisper Creek Golf Resort only. Each of these This resorts is subject to a Development Plan which illustrates the extent of the zone, activity areas and other key features.
- c. Within these two this areas, this chapter enables golfing and associated facilities (including resort facilities), other recreational opportunities, and limited residential development. The objectives, policies, rules, standards, matters of discretion and Development Plans provide for these activities, while seeking to ensure there are no significant adverse effects on the natural or adjoining rural environments.
- d. The provisions in this chapter give effect to the Chapter 3 Strategic Directions Objectives.

13.9.2 Objectives and Policies

13.9.2.1 Objective – Golf resort development

a. For the Clearwater Golf Resort and Whisper Creek Golf Resort, to provide golfing and associated facilities (including resort facilities) of international standard, bringing economic and social benefits to the City and region, and to provide other recreational opportunities, and limited residential development, within extensive open space and lake or riparian settings, with no significant adverse effects on the natural or adjoining rural environments.





13.9.2.1.1 Policy - Benefits to the community

a. Recognise the economic and social benefits that the Clearwater Golf Resort provides and Whisper Creek Golf Resort can provide to the City and region, and assist in enabling the potential benefits of these this resorts for ecological restoration, public access to streams and rivers, and recreation for the wider community, including local community, to be realised.

13.9.2.1.2 Policy – Limit on scale of development and types of activity

- a. Limit urban development detached from the remainder of the Christchurch urban area, and for the Clearwater Golf Resort, within the 50 dB L_{dn} noise contour for Christchurch International Airport, by:
 - i. Ensuring that the scale and nature of resort hotel, residential and commercial development associated with the golf resorts is complementary and subsidiary to the primarily recreational function of the resorts;
 - ii. Adopting a clear distinction between resort hotel and residential development, both in terms of the nature of each type of development and its location within the overall site;
 - iii. Ensuring that noise sensitive activities within the 55 dB L_{dn} airport noise contour are acoustically insulated, and that the scale and location of further development within the 50 dB L_{dn} contour is limited to that provided for in the previous City Plan, or authorised by resource consent on or before 6 December 2013.

13.9.2.1.3 Policy – Visual integration and mitigation of effects

a. Ensure that built development is well integrated visually into the open rural environments within which each the golf resort sits, and that there is adequate separation distance from activities in adjacent zones so as to mitigate potentially adverse effects of the resorts such as noise and traffic.

13.9.2.1.4 Policy - Careful siting

a. Ensure that earthworks and buildings in the two golf resorts are carefully designed, located and constructed, for the Whisper Creek Golf Resort so as to be resilient to potential liquefaction and to maintain flood storage capacity in the Lower Styx Ponding Area, and for both resorts, to reduce potential flood damage to buildings in a major flood event.

13.9.3 How to interpret and apply the rules

- a. The rules that apply to activities in the Specific Purpose (Golf Resort) Zone are contained in the following provisions:
 - i. For Clearwater Golf Resort:
 - A. activity status tables (including activity specific standards) in Rule 13.9.4.1;
 - B. the built form standards in Rule 13.9.4.2;
 - C. area specific standards in Rule 13.9.4.3.
 - D. the matters of discretion in Rule 13.9.6; and
 - E. the Development Plan in Appendix 13.9.7.1
 - ii. For Whisper Creek Golf Resort:
 - A. activity status tables (including activity specific standards) in Rule 13.9.5.1;
 - B. the built form standards in Rule 13.9.5.2;
 - C. area specific standards in Rule 13.9.5.3.
 - D. the matters of discretion in Rule 13.9.6; and





E. the Development Plan in Appendix 13.9.7.2

13.9.5 Rules - Specific Purpose (Golf Resort) Zone - Whisper Creek Golf Resort

Delete this entire section – all rules 13.9.5.1.1 - 13.9.5.3.1

13.9.6 Rules - Matters of discretion - Clearwater Golf Resort and Whisper Creek Golf Resort

13.9.6.5 Location of activities outside of areas specified in development plans

- a. The compatibility of the proposed development pattern with the remainder of the zone and with the open space, and rural character of the wider locality;
- b. Any adverse effects on the amenity of the Groynes Recreation area (Clearwater Golf Resort only) and surrounding rural zones (both resorts);
- c. The ability to continue to provide an effective and ecologically sensitive stormwater management system;
- d. The connectivity within the Zone and with adjacent open space zones, where appropriate, in terms of vehicular, cycle and pedestrian access;
- e. The proximity of higher density development to open space for passive and active recreation, while avoiding higher density development being located immediately adjoining rural areas;
- f. The application of the principles of Crime Prevention Through Environmental Design;
- g. The ability to create and preserve view shafts to the golf course and beyond;
- h. Whether the proposed revised location(s) for activities better mitigates risks from natural hazards, including flooding, seismicity and liquefaction; and
- i. Any effect either positive or adverse on tangata whenua values.

13.9.6.8 Construction of the Golf Course - Whisper Creek Golf Resort only

- a. The provisions of a management plan to address the following:
 - i. The biodiversity and enhancement of waterways and wetland areas, as well as measures to mitigate any adverse effects on biodiversity.
 - ii. Details of design, construction and operation of the golf course drainage system and wetlands, including proposed excavation and filling, and potential effects on sediment discharges and water quality.
 - iii. Storage capacity in the Lower Styx Ponding Area and effective management of stormwater and flood discharges in the Zone, with consideration of tidal influences and the effects of sea level rise.
 - iv. Amenity planting around the Zone boundary and its ability to screen and soften built development.
 - v. Appropriate management of any archaeological sites.

13.9.6.9 Concept Plan for Whisper Creek Golf Resort only

- a.—The provisions of a concept plan and supporting documentation that shall include the following:
 - The indicative subdivision layout including indicative densities and distribution and indicative roadlayout;
 - ii. The location of sites for built development in relation to golf course and open space areas within the Zone and to the open space and rural character of the wider locality;





- iii. Any area specific measures for mitigating risks from natural hazards, including flooding, seismicity and liquefaction;
- iv. Connectivity with other parts of the Zone and with adjacent open space and other zones, in terms of car parking locations, walkways and cycle ways;
- v. Provisions for stormwater management;
- vi. The application of the principles of Crime Prevention Through Environmental Design;
- vii. The ability to create and preserve view shafts to areas across and beyond the site; and
- viii. An assessment of effects, either positive or negative, on tangata whenua values.

13.9.7 Appendices

Appendix 13.9.7.2 Development Plan for Whisper Creek Golf Resort

Delete Whisper Creek Outline Development Plan

Chapter 8

8.5.1.4 - Discretionary activities

D2

Any subdivision in the Specific Purpose (Golf Resort) Zone — Whisper Creek Golf Resort that does not comply with a concept plan approved by the Council for that activity area in accordance with Rule 13.9.5.1.3 RD6 Concept plans.

8.6 Activity standards

8.6.1 Minimum net site area and dimension

Table 4. Minimum net site area – specific purpose zones

Specific Purpose
(Golf Resort)

a. No minimum net site area in the Specific Purpose (Golf Resort) Zone at Clearwater and at the Whisper Creek Golf Resort.

b. Concept Plan

- i. No subdivision shall take place within Academy Activity Areas
 A, A1 & A2 Whisper Creek Golf Resort shown on the
 development plan in Appendix 13.9.7.2 to Chapter 13.9, unless
 a concept plan has been lodged with and approved by
 the Council for that activity area in accordance with
 Rule 13.9.5.1.6 RD6 Concept plans.
- c. Sequencing standards Whisper Creek Golf Resort-
 - Prior to the Council signing a section 224 certificate under the Act, for the 71st residential allotment in the Resort Community Activity Areas,
 - A.—The golf course and wetlands within the golf course shall have been constructed and planted in accordance with 13.9.5.1.6 RD6; and
 - B. A Management Plan for the adjoining Open Space-Margins and Water Zone shall have been lodged with and





- approved by the Council, which makes provision for indigenous planting (indicating species, layout and density), and which is in accordance with the development plan for the Whisper Creek Golf Resort at Appendix 13.9.7.2 to Chapter 13.9, for a public access track along the River, for a bridleway from the Styx River to Spencerville Road, and for a bridge providing public vehicle access across the Styx River;
- C. 50% of the planting identified in the Management Plan for the Open Space Margins and Water Zone shall have been completed; and
- D.—Legal instruments shall have been registered against the head title, securing:
 - I. Public pedestrian access over the access track identified in the Management Plan, and
 - II. Public access for the purpose of a bridleway from the Styx River to Spencerville Road.
- ii. Prior to the Council signing a section 224 certificate under the Act, for the 120th residential allotment in the Resort Community Activity Areas,
 - A.—All of the planting identified in the concept plan for adjoining Open Space – Margins and Water Zone approved by the Council shall have been completed; and
 - B. The public access track, the bridleway from the Styx River to Spencerville Road and the bridge across the Styx River shall have been constructed.
- d. Any subdivision shall only be for the purpose of creating allotments to be used for any activity permitted in the zone or for which resource consent is held, or for conservation purposes, permitted utilities or boundary adjustments.
- e.—Allotments for residential units, resort apartments or resort
 hotel bedrooms shall only be subdivided when
 a building or buildings are still allowable for that allotment within the
 maximum number limited specified for the zones.

8.7 Rules as to matters of control – subdivision

8.7.9 Additional matters - Specific Purpose (Golf Resort) Zone at Christchurch Golf Resort

 a. Whether the location of an identified building area is fully contained within the boundaries of the Resort Community and Academy Activity Areas.





- b. Whether it is appropriate to require a legal instrument be registered against the head title securing public pedestrian access over the access track identified in the development plan.
- c. Whether it is appropriate to require a legal instrument be registered against the head title securing a bridleway from the Styx River to Spencerville Road, as shown on the development plan.
 - d. 8.10 Appendices
 - e. Add a new Outline Development Plan and associated narrative as Appendix 8.10.3X

The ODP needs to be replaced with either the plan that was attached to the RFI response dated 7 July 2025 or any updated plan that may be provided as part of this RFI response.

8.10.3X.A CONTEXT

a. This area to the north east of Christchurch lies to the north of the Styx River, one of the primary natural features of Christchurch. Prior to European settlement, the extensive wetlands and easy access to the sea made the Styx an important area for mahinga kai (food gathering) and for the cultivation and harvesting of flax. The Styx River forms part of the southern and eastern boundary of the neighbourhood. Surrounding areas are utilised for a mix of larger farms and smaller rural lifestyle blocks. Chaneys Forest is to the north, Bottle Lake Forest and Spencerville are to the east, and the existing residential area and associated commercial centre of Prestons is located approximately 2km to the south.

8.10.3X.B GUIDANCE

a. Guidance on the means to achieve the development requirements and form and design elements is provided within the Christchurch City Council's Creating New Neighbourhood Design Guide.

8.10.3X.C DEVELOPMENT FORM AND DESIGN

- a. The following design elements and features are relevant considerations in exercising control over the matters in 8.7.1 8.7.4 or the matters for discretion in 8.8. They are not requirements for the purposes of Rule 8.6.11(a) or Rule 14.12.2.16.
 - 1. The main features of this area will be the Styx River and a large open space area located on a lower terrace between the residential development area and the river margins.
 - 2. Where the RNN abuts or is opposite properties in the Rural Urban Fringe Zone larger section sizes are anticipated, with planting buffers and building setbacks along the area's external road edges with Teapes Road, Turners Road, and Spencerville Road. These sites shall be of a size that provide for future subdivision with potential vehicle access from these road edges.
 - 3. <u>Higher densities are appropriate in close proximity adjacent to open space areas and/or the proposed neighbourhood centre, and active and public transport routes.</u>
 - 4. The total yield shall not exceed 800 households consistent with the available volume of potable water and capacity of the local pressure wastewater network that form part of the supporting infrastructure to service the site.
 - 5. <u>Pedestrian and cycle links are to be provided to link the site to local schools, Prestons, Spencerville,</u>
 Bottle Lake Forest, and along the Styx River corridor.
 - 6. The character is that of an urban village, including the provision of landmark features and a coherent design, while providing for a diversity of residential building scales, types and styles.

8.10.3X.D DEVELOPMENT REQUIREMENTS

a. <u>The development requirements for the purposes of Rule 8.6.11(a) and Rule 14.12.2.16 are described</u> below and are shown on the accompanying plan.





1. <u>INTEGRATION</u>

- a. There are several landowners within this ODP area and a number of existing properties. Subdivision designs are to demonstrate good connectivity between different land ownership areas through road, open space, and pedestrian and cycle way linkages, and the overall character of the urban area.
- b. The development is to provide new road access connections and shared paths to Teapes Road, Turners Road, and Spencerville Road.
- c. Lots with frontage to Teapes Road, Turners Road, and Spencerville Road are not to obtain individual site access from these roads and shall instead obtain access from new internal roads. Open rural-style fencing is to be provided along these three external road frontages, with a 5m deep landscape strip and a 10m deep building setback. Trees planted within the landscape strip are to be maintained. It is anticipated that these outcomes will be delivered via consent notices on the titles.

2. OPEN SPACE, RECREATION AND COMMUNITY FACILITIES

- a. Retention of the lower terrace as a large open space area that can be utilised for a combination of access, recreation, ecological restoration, stormwater management, and farming.
- b. Five Three neighbourhood parks are to be provided to ensure all that most residential units are within 500m of a park where child play facilities can be located. Where appropriate, neighbourhood parks are to be co-located with stormwater basins.
- c. A Neighbourhood Centre is to be provided, overlooking the stormwater basins where it is accessible within the residential catchment via pedestrian paths, provides a focal point for the community, and is viable. The Centre is to be commensurate with the role and function of a Neighbourhood Centre as set out in Policy 15.2.2.1 Tabel 12.1(E) and is to be no larger than 3,000m² GFA.
- d. Continuation of the Styx River 'Source to Sea' reserve network along the river corridor.
- e. Where a pedestrian and cycle pathway is denoted, it shall be located within a corridor of a width that provides for unimpeded, safe and efficient movement of cyclists and pedestrians.
- f. Pathways for pedestrian and cycleists pathways are to be provided along the eastern and western edges of the site to connect the Development Area with the Styx River margins.
- g. Where appropriate, mMid-block pathways for pedestrians and cycleists to pathways shall connect the Development Area to Turners Road and Spencerville Road.
- h. A pedestrian and cycle corridor pathway shall be provided to connect the site to Ouruhia Model School via the Styx Loop Conservation Park and a short section of Turners Road.
- A pedestrian and cycle corridor to pathway shall connect the site via a bridge to Lower Styx Road and then
 to the intersection of Lower Styx Road and Te Korari Street at the northern entrance to Prestons. A
 pedestrian and cycle link to Bottle Lake Forest is also to be provided from this corridor pathway.





3. ACCESS AND TRANSPORT

- a. A collector road looping through the site to provide an internal link between Turners Road and Spencerville Road.
- b. <u>A fully interconnected local road network across the site that achieves a high level of accessibility for people, including opportunities for walking, cycling and public transport.</u>
- c. <u>Upgrades to the sealed width of Turners Road. Upgrade of the Turners Road/ Marshland Road intersection</u> to provide a left turn lane from Turners Road when more than 700 residential lots are created.

4. STORMWATER

- a. <u>A sustainable stormwater management solution for the neighbourhood integrated with alongside open space reserves.</u>
- b. <u>Enhancement of the habitat and ecological values of the Styx River and its margins in association with</u> stormwater management and provision of reserves.
- c. Restoration, naturalisation and ecological enhancement of Spencerville Drain.

5. WATER AND WASTEWATER

- a. A water supply network and an associated new bore and water treatment plant and potential storage facility.
- b. <u>Sufficient water supply to meet fire-fighting requirements.</u>
- c. <u>A local pressure sewer network, discharging to a rising trunk sewer to be laid along Spencerville Road, over the existing bridge and then along Lower Styx Road to pump station 78 at Heyders Road in Spencerville.</u>

6. STAGING

a. There are no staging requirements beyond those relating to the provision of infrastructure.

7. NATURAL HAZARDS

a. Within Area 'A' (Identified in the High Flood Overlay) buildings are restricted and the provisions of Chapter 5.4.6 are applicable.

Amend planning maps to show change in zoning

Consider the need to include the NCZ over the location of the commercial centre on the ODP and alternative zoning of the lower terrace portion of the site.

The scope of PC23 should also include the requested changes to the CDP Qualifying Matters Planning Maps.

