

11 June 2025

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LMM Investments 20212
c/- Jonathon Clease, Director
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Attn: Jono Clease, jonathon@planzconsultants.co.nz

Dear Jonathon,

Thank you for lodging Private Plan Change 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 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 of Schedule 1 of the Resource Management Act (RMA) the Christchurch City CCC (CCC) requests the following further information. The further information detailed in this letter is required to enable the CCC to better understand the nature of the request in respect of the effects it will have on the environment, the ways in which any effects of the proposal may be mitigated, the benefits and costs, and the efficiency and effectiveness of any possible alternatives to the request, and the nature of any consultation undertaken.

Planning

Local authority to consider the request

- 1) 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.¹

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

Requested changes

- 2) Appendix K of the request includes the track changes to the CDP provisions that include a replacement Outline Development Plan (ODP). While it is understood that the replacement CDP Planning Map that is being sought is illustrated in Figure B of Appendix F Graphic Attachments,² this isn't contained in Appendix K.

The CCC requests that the proposed changes to the CDP Planning Maps are illustrated in Appendix K to ensure all the proposed changes are recorded.

Commercial and community hub

- 3) The request makes provision for a Neighbourhood Centre with a maximum Gross Floor Area (GFA) of 1,500m² to support the local convenience needs of the estimated 650 additional households that are facilitated by the

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

² PC23 Whisper Creek, Appendix F Graphic Attachments, B. Proposed Christchurch District Plan Zoning, pg.6.

rezoning request.³ One of the identified benefits is the reduced need to travel beyond the subdivision to access basic conveniences and services. We note that the operative Specific Purpose (Golf Resort) Zone provisions enable 1,000m² of food and beverage outlets and 5,000m² GFA of retail activity.⁴ However, we have been unable to identify any ODP narrative to distinguish this 1,500m² GFA from the 3,000m² Neighbourhood Centre GFA provided for in the CDP.⁵ The economic assessment contained in Appendix A supports a “... *small-scale* ...” commercial activity and that its size “... *is intentionally small* ...” but is otherwise silent on why 1,500m² has been determined to be the optimal size based on projected needs and economic viability.⁶

The CCC requests that the proponent provides an updated economic assessment of the proposed location, size and viability of the community and commercial hub and an assessment of the implication on accessibility and car dependency if the Neighbourhood Centre were never established. Confirmation of the need ODP narrative or rules is also necessary to ensure that any future development does not exceed the suggested 1,500m² GFA. These responses are required to establish the viability of the proposed Neighbourhood Centre and to determine the extent to which it supports urban design concepts such as connectivity, safety and activity generators.

Consultation

- 4) The request includes a preliminary Cultural Impacts Assessment (CIA) prepared by Mahaanui Kurataiao Limited that is dated 20 January 2022.⁷ As communicated previously, we would appreciate the proponent sharing PC23 with the Whitiara Centre Limited (Whitiara) and seeking comments on the request on behalf of Ngāi Tūāhuriri Rūnunga.

The CCC appreciates the proponent’s efforts to engage with Ngāi Tūāhuriri Rūnunga via Whitiara, the outcome of which will assist to provide a clearer understanding of mana whenua’s position on PC23.

- 5) The request identifies that no consultation has occurred with Environment Canterbury in preparing PC23.⁸ We recognise that there is no mandatory requirement on private plan change proponents to consult with regional CCCs under clause 3 of Schedule 1 of the RMA. However, it would be helpful to know what Environment Canterbury’s position is on the appropriateness of the request.

The CCC requests that the proponent outline any engagement that has been undertaken with Environment Canterbury. This context would be useful to substantiate the conclusions in PC23 that the request is consistent with the relevant objectives and policies of the CRPS, the likelihood public transport connections could be extended to service the site in the future, and identifying any natural hazard or contaminated land risks in rezoning the land.

Transport

PC23 and the supporting assessments have been reviewed by David McGonigal, CCC’s Transport Network Planner. This includes the Integrated Transport Assessment (ITA) prepared by Novo Group Limited in Appendix E and the Transport Network Effects Modelling Technical Report prepared by Quality Transport Planning contained within it.

- 6) While the ITA covers the operational effects of the rezoning, the request does not adequately address how PC23 will better deliver the objectives and policies of the CDP in relation to transport outcomes in comparison to the operative Specific Purpose (Golf Resort) Zone. PC23 also does not assess the consistency of the rezoning against the relevant higher-level planning documents to an acceptable level.

The CCC requests that the proponent provide a more detailed transport assessment of PC23 against the relevant objectives, policies, and outcomes of the following higher order planning instruments and strategies:

- Canterbury Regional Policy Statement (CRPS), including the relevant transport objectives and policies in Chapter 5 and 6.

³ PC23 Whisper Creek, Section 32 Assessment, pg.10. and Appendix K ODP Narrative.

⁴ CDP Chapter 13 Specific Purpose Zone, 13.9.5 Rules - Specific Purpose (Golf Resort) Zone - Whisper Creek Golf Resort, 13.9.5.1 P5 and P6.

⁵ CDP, Chapter 15, 15.2.2 Objective - Centres-based framework for commercial activities, Table 15.1 – Centre’s Role.

⁶ PC23 Whisper Creek, Appendix A Economic Assessment, pg.2 & 6, Section 7 Impacts of Community and Commercial Hub, pg. 19 to 21.

⁷ PC23 Whisper Creek, Appendix I.

⁸ PC23 Whisper Creek, Section 32 Analysis, 3.7 Consultation, pg.13.

- Greater Christchurch Spatial Plan.
- Greater Christchurch Transport Plan.
- Canterbury Regional Land Transport Plan 2024-2024.
- Ōtautahi Christchurch Future Transport 2024-54.

These additional transport assessments are required to enable the appropriateness of the request to be evaluated in the context of the wider strategic transport outcomes.

Landscape and Visual

PC23 and the supporting assessments have been reviewed by Hilary Riordan, CCC's Resource & Landscape Planner. This includes the landscape and visual assessment prepared by DCM Urban Design Limited in Appendix F.

Village amenity

- 7) A key design outcome that is identified by the proponent is that PC23 will create a high amenity rural village. However, there is insufficient direction provided in the ODP in Appendix K or the existing RNN Zone provisions to ensure that these outcomes will be achieved, including in respect to street tree planting, street widths or gateway/threshold treatments.

The CCC requests that the proponent considers what additional PC23 provisions are required to ensure the high amenity village character and amenity will be achieved should the rezoning be successful.

Wetland and stormwater basin

- 8) The ODP in Appendix K of PC23 requires that the area encompassing the lower terrace and referenced as "*Wetland, Recreational and Open Space area*" is retained "... as a large open space that can be utilised for a combination of recreation, ecological restoration, stormwater management, and farming."⁹ While we appreciate that the detailed design and management arrangements for this area are proposed to be determined through the subdivision process, the types of activities that are likely to occur within this 75 ha area are unclear.

The CCC requests that the proponent provides more detail on the likely land use activities, including the prospect that it could be utilised for rural grazing activities, to enable the visual effects of the rezoning to be quantified and assessed.

Landscape edge treatments

- 9) The ODP in Appendix K makes provision for a 5 m wide landscape buffer, 10 m minimum building setback, access arrangements and fencing typologies along the site boundaries with Teapes Road, Turners Road, and Spencerville Road.¹⁰ However, the site also shares internal boundaries with the adjacent RUF Zone that are subject to the "*Proposed Rural Interface*" annotation on the ODP Plan. This includes the properties at 18 Teapes Road and 250 and 266 Spencerville Road. 250 and 266 Spencerville Road adjacent to the western and southern boundaries of the site do not have the "*Proposed Rural Interface*" annotation. It is also unclear whether this annotation relates specifically to the ODP narrative under 8.10.3X.D 1 Integration – c.

The CCC requests that the proponent clarify the extent of the 'Proposed Rural Interface' marked on the ODP, and that the ODP narrative outlined above is the primary method for implementing the "*Proposed Rural Interface*" treatment prescribed in the ODP plan and make any necessary amendments to make this clear in the Appendix K. Alternatively, if we have misinterpreted how the interface treatment is applied then please clarify how PC23 will deliver the landscape edge treatments described in the request.

- 10) The request outlines that the 5 m wide planting buffer that forms a component part of the "*Rural Interface Treatment*" is to be a mix of native (shrubs and trees) species and that continuous minimum height of 5 m is to be achieved.¹¹ However, this minimum height requirement is not reflected in the proposed plan change text or the ODP plan or narrative in Appendix K.

⁹ PC23 Whisper Creek, Appendix K, 2. Open Space, Recreation and Community Facilities, pg.9.

¹⁰ PC23 Whisper Creek, Appendix K, 1. Integration, pg.9.

¹¹ PC23 Whisper Creek, Appendix F, Landscape Treatment on Road Boundaries, pg.13.

The Council requests that the proponent confirm that the Rural Interface Treatment includes a requirement for a 5 m wide landscape strip to be maintained at a minimum height of 5 m is being sought and make any necessary amendments to PC23 to ensure this requirement is reflected in the proposed changes.

Urban Design

PC23 and the supporting assessments have been reviewed by CCC's appointed urban designer advisor, Josie Schröder who is Director of Urban Opera NZ Limited. This includes the urban design and landscape and visual assessments prepared by DCM Urban Design Limited in Appendix F and G.

Outline Development Plan (ODP)

- 11) The PC23 ODP identifies the key "*structuring elements*" that will be delivered as component parts of the rezoning.¹² These include the locations for residential development, higher density housing, neighbourhood centre, open space, transport networks, and perimeter treatments.

The CCC requests that the proponent identify which structuring elements of the ODP are fixed and which are flexible in respect to their respective locations. This response is required to enable an assessment to be undertaken of the likely future layout of the subdivision and the extent to which the ODP may meet the identified objectives and policies.

- 12) The request establishes that the portion of the site that is subject to the Specific Purpose (Golf Resort) Zone is either owned or under negotiation to be owned by LMM Investments Limited (the proponent).¹³ The balance of the site that is subject to the RUF Zone is held by several different owners who we understand have been consulted as part of the process to prepare the request. However, the ownership structure and the implications this may have on delivering the "*structuring elements*" and identified PC23 outcomes are unclear.

The CCC requests that the proponent provide an ownership plan, including those landowners' who are a party to PC23. This response is required to understand the complexity in managing the delivery of the structuring elements of the proposal through the ODP.

- 13) The requested changes to the CDP planning maps indicate that the Residential New Neighbourhood (RNN) Zone is to be applied to the extensive ecological restoration area that is referenced as the "*Wetland, Recreational and Open Space area*" in the ODP that is located adjacent to the Open Space Water and Margins (OSWM) Zone.¹⁴ We understand that the PC23 ODP requires that the details of how this area would be established and maintained is to be determined at the time of subdivision. However, a clear understanding of how this area will achieve the connectivity, open space and ecological restoration outcomes expressed in the request is critical to enabling a determination to be made on the appropriateness of PC23 relative to the existing Specific Purpose (Golf Resort) Zone.

The CCC requests that the proponent provide the rationale for applying the RNN Zone over "*Wetland, Recreational and Open Space area*" in the ODP and detail how the identified outcomes expressed in the PC23 can be realised. This includes the scenario where CCC does not accept this portion of the site as a Local Purpose Reserve that is vested and administered under the Reserve Act 1977. This response is required to check alignment across the zoning maps and ODP and to establish whether the outcomes expressed in PC23 can be realised. The extent to which this area has been relied on to support the rezoning and how it will be delivered if the rezoning were successful are also matters raised by CCC's Landscape and Visual expert and CCC's Parks Biodiversity Team.

- 14) The ODP narrative requires an extensive active network to be established at the time of subdivision to connect the site with key services and facilities in the area. This includes walking and pedestrian connections to Ouruhia Model School via the Styx Loop Conservation Park and Turners Road, continuation of the Pūharakekenui-Styx River "*Source to Sea: network*" along the river corridor and connections to connect the site to Lower Styx Road and beyond.¹⁵ While we recognise that this is a subdivision requirement, we would like to establish the likely funding arrangements for

¹² PC23 Whisper Creek, Section 32 Analysis, para.2, pg.6.

¹³ PC23 Whisper Creek, Section 32 Analysis, para.6, pg.4.

¹⁴ PC23 Whisper Creek, PC23 Whisper Creek, Appendix F Graphic Attachments, B. Proposed Christchurch District Plan Zoning, pg.6.

¹⁵ PC23 Whisper Creek, Appendix K, 2. Open Space, Recreation and Community Facilities, pg.9.

establishing and maintaining these networks and how the land is intended to be acquired and held if it isn't currently within an existing road reserve or CCC administered open space reserves.

The CCC requests that the proponent outline how the intended future connections, particularly the active transport connections, are to be achieved and who is responsible for acquiring and maintaining the land. More specifically, we request that the proponent indicate whether there are any limitations on the provision of further pedestrian/cycle access from within the proposed residential development area and Spencerville and Turners Roads. This is because there appears to be quite significant block lengths with a limited number of access points. These responses are required to understand how the intended levels of connectivity can be achieved and what impact, if any, the failure to establish these connections in the future would have on delivering the outcomes expressed in PC23.

Masterplan/subdivision

The following matters are required to assess the design outcomes of the rezoning, recognising that the masterplan is conceptual.

- 15) We understand that the request relies on the RNN Zone and Chapter 8 subdivision provisions, which support a range of residential densities that are to be determined at the time of subdivision. The ODP narrative indicates that it is appropriate that the higher densities are in proximity to the open space areas and/or the neighbourhood centre¹⁶ and the lower densities around the site perimeter.¹⁷ However, it is difficult to establish what the likely feasible range of lot sizes could be and how these are to be distributed across the site. In addition, it is unclear how the minimum yield of 15 hh/ha can be achieved given the lower housing densities around the periphery of the site and that a large portion of the proposed RNN Zone applies to the *“Wetland, Recreational and Open Space area”* on the ODP.

The CCC requests that the proponent provide a general breakdown of the lot sizes that are likely to be provided in a future subdivision scheme if the rezoning were successful, including the proportion of low to medium density lots/households that could be provided. This response is required to clarify how the minimum 15 hh/ha densities can be achieved based on the proposed ODP land use options and the PC23 provisions.

- 16) The replacement ODP and narrative in Appendix K indicate that an extensive network of pathways will be established through the *“Wetland, Recreational, and Open Space”* area. However, it is unclear how these will be established at the time of subdivision as the proposed provisions are silent on who is responsible for establishing and maintaining these critical walking and cycling connections.

The CCC requests that the proponent outline what pathways, what ecological restoration is proposed and whether this is intended to be undertaken by the proponent as part of the development. Confirmation of whether the pathways are intended to be *“publicly accessible”* but privately owned or within public ownership is required as this potentially impacts on the freedom of use and the effectiveness of the proposed connectivity network.

- 17) The request places weight on an urban design contextual analysis of the site to establish the appropriateness of the rezoning. However, it wasn't obvious when reviewing the request or the urban design assessment contained in Appendix G how this contextual analysis has influenced the proposed PC23 provisions.

The CCC requests that the proponent provide a more detailed site context analysis, with an accompanying urban design statement. This is required to clarify how the references to 'character' and 'creativity' that are contained in the urban design assessment provided have been achieved in the replacement ODP.

- 18) The preliminary CIA in Appendix I recommends that the proponent apply the Ngāi Tahu Subdivision and Development Guidelines to maintain consistency with the related policies of the Mahaanui Iwi Management Plan.¹⁸ It is unclear how PC23 has factored low impact design urban design and sustainability options into the proposed provisions and ODP in Appendix K or the concept plans contained in Appendix F. This includes in respect to low impact and self-sufficient solutions for water, waste and energy.¹⁹

¹⁶ PC23 Whisper Creek, Appendix K, 8.10.3X Development Form and Design, pg.8.

¹⁷ PC23 Whisper Creek, Section 32 Analysis, Range of Housing Typologies, pg.3.

¹⁸ PC23 Whisper Creek, Appendix I, Recommendation 2, pg.7.

¹⁹ PC23 Whisper Creek, Appendix I, Appendix 1 - Ngāi Tahu Subdivision and Development Guidelines, Design Guidelines, pg.10.

The CCC requests that the proponent outlines the design response to the policy frameworks for achieving sustainable development outcomes, including in respect to the low impact design initiatives anticipated in response to the recommendations contained in the preliminary CIA in Appendix I of PC23.

Open Space

PC23 and the supporting assessments have been reviewed by Peter Barnes, CCC's Senior Parks and Policy Planner.

- 19) We note that the ODP in Appendix K identifies that provision is being made for five neighbourhood parks and that the size will be determined at the time of development.²⁰ However, the Parks and Reserves team estimate that only four local parks are likely to be required and that 3,000m² is the standard size. This is on the basis that CCC's Levels of Service requirements for the city wide Local (Neighbourhood) Parks applies a proximity and accessibility metric of "... no more than 500m or 80% of residents."

The CCC requests that the proponent review the number of neighbourhood parks and area of land that has been allocated to these reserves across the site and make any necessary amendments to PC23, including the proposed ODP in Appendix K.

Biodiversity

PC23 and the supporting assessments have been reviewed by CCC's Parks Biodiversity Team. This includes the ecology assessment prepared by Viridis Environmental Consultants in Appendix H and the graphics package contained in Appendix F.

The preliminary advice is that PC23 could have significant positive outcomes for protecting, maintaining and enhancing indigenous biodiversity and ecological values. The rezoning also has the potential to make a significant contribution to a network of accessible natural areas and wilderness experiences throughout the city, including the "*Source to Sea: Network*" along the Pūharakekenui-Styx River.

Although these are not request for further request items, the Parks Biodiversity Team also note that if acquired by CCC, the 75 ha "*Wetland, Recreational and Open Space*" area identified in the ODP Plan would be a significant contribution to the city's biodiversity and ecology. It could also contribute to the City achieving 10% indigenous vegetation coverage across its urban and rural areas as required by the National Policy Statement on Indigenous Biodiversity. Aside from any immediate protection and mitigation required along the Pūharakekenui-Styx River, internal drains and wetlands, more extensive wetland development across the 75-ha site could be staged and developed over time as resources/budgets allow. In the interim, the area could continue to be grazed and provide short-to-medium term grazing revenue for ongoing development and management.

The Pūharakekenui-Styx River riparian margin cadastral boundaries

- 20) Section 6.3.1 Water and Stream Quality of Appendix H identifies that a Local Purpose (Esplanade) Reserve is intended to be established along the Pūharakekenui-Styx River. The cadastral boundaries through this riparian margin are convoluted and confusing as a result of historic river straightening works. This complexity is recognised in the prior communications from the proponent and to CCC where a plan titled "*Whisper Creek, Drawing No. E.19432*" prepared by Davie Lovell-Smith and dated April 2025 was circulated to outline the general locations of the zone boundary relative to Lower Styx Road and the Pūharakekenui-Styx River. However, there remains uncertainty in respect to the status of the land within this riparian margin, particularly in the vicinity of the Teapes Road bridge and other locations along the south-eastern boundary of the site. This is because it remains unclear what land is to be utilised for open space, recreation and ecological restoration activities as part of PC23 and the public unformed legal road, the hydro-parcel Crown land (that represents the original Pūharakekenui-Styx River alignment prior to the historic straightening works), privately held parcels and the Lower Styx Road reserve.

The CCC requests that the proponent provides an amended plan illustrating what portion of the Pūharakekenui-Styx River riparian margin is intended to be vested as Local Purpose (Esplanade) Reserve as part of any future subdivision should the rezoning be successful. Confirmation of how the boundaries of these esplanade reserves relate to unformed legal road and what appears to be landlocked private land between the unformed legal road and the Pūharakekenui-Styx River is also required to enable the appropriateness of the rezoning to be determined.

²⁰ PC23 Whisper Creek, Appendix K, 2. Open Space, Recreation and Community Facilities, pg.9.

Ecology

- 21) The following matters are noted in respect to the Appendix H Ecology Assessment to assist in determining the appropriateness of the rezoning. A response to these items is important in determining the extent to which PC23 is relying on the “*Wetland, Recreational and Open Space*” area within the ODP and the OWSM Zone to offset the ‘greenfield’ residential development through active networks, ecological restoration, open space, carbon emissions and natural hazard management:
- There is no mention of the value of pasture or the scattered wetlands in the area (including seasonal/ephemeral wetlands) for waterbirds and waders, such as pied stilt, oystercatchers, gulls, and herons.
 - There is no mention of the value of the Pūharakekenui-Styx River for avifauna species, including bush birds and waterfowl (potentially for Crakes and Bittern).
 - There is likely a broad range of naturally occurring indigenous plants and habitats along the Pūharakekenui-Styx River, including a probable stronghold of the at risk-declining *Urtica persconfusa* /swamp nettle.
 - Section 5.3.1 River-associated Wetlands does not consider the fluctuating wetland area resulting from elevated river levels during peak aquatic weed growth. The identified wetland(s) may be more expansive than what is indicated and it is likely to have value for indigenous avifauna at different times of the year.
 - Section 5.3.2 Intermittent Wetlands determines that these areas have negligible ecological value. However, as with other local ephemeral wetlands, they are likely to be significant sites. This is because they may meet the CRPS criteria as Sites of Ecological Significance as habitats of representative indigenous fauna (for example, indigenous waders such as stilts, oystercatchers, herons and possibly native waterfowl). Identifying, protecting and maintaining these wetlands is an important consideration when evaluating the appropriateness of PC23.
 - Section 6.2.1 Impact on Terrestrial Ecology needs to consider and respond to any impacts the potential future development of the site that the rezoning could enable on ephemeral wetlands and their use by wader species.
 - Section 6.2.3 Impact of Freshwater Ecology needs to consider any impacts on wader and waterbird species, including the impacts of increased presence of humans and pets in the area that could increase the risk of disturbance and predator populations. This is in the context that the Specific Purpose (Golf Resort) Zone enables “*a golf course in a wetland*” involving significant natural wetland restoration that was to be funded by the developer, which would have had immediate positive impacts/outcomes for indigenous wildlife populations.
 - Section 6.4.1 Proposal needs to consider the seasonal significance of the wetlands to support indigenous wading birds and waterfowl species.

The CCC requests that the proponent considers the above items and address them in an updated Appendix H Ecology Assessment. Alternatively, please advise why you consider that these matters do not need to be addressed. This additional information is required to establish the appropriateness of PC23 on the ecology and biodiversity of the site and adjoining environment, including the Pūharakekenui-Styx River.

Appendix F Graphics Attachment

- 22) The following matters are noted in respect to the Appendix F Graphic Attachments as they relate to biodiversity and open space and how the PC23 ODP in Appendix K achieves the outcomes expressed in the rezoning:
- A stronger connection should be provided between Bottle Lake Forest and Chaney’s Plantation on the Connectivity Map in Appendix F²¹ and the corresponding narrative in the ODP in Appendix K. This would require a bridge across the Pūharakekenui-Styx River and a property acquisition between Spencerville Road and Chaney’s Plantation in the future. However, a desired link should be shown in the concept plan to facilitate this indicative connection.
 - The housing appears to be very close to the edge of the Pūharakekenui-Styx River at the western end of the site. This creates a pinch point where the natural character and wilderness experience of the river margin and the associated enjoyment of the “*Source to Sea*”:

²¹ PC23 Whisper Creek, PC23 Whisper Creek, Appendix F Graphic Attachments, A. Concept Masterplan, pg.9.

Network” could be compromised. Assurances are required that the riparian margin is wide enough through the provision of scale cross sections or site plans to effectively accommodate the ecological restoration and accessibility identified in PC23. Alternatively, confirmation is required that adequate screening would be established as part of the PC23 landscape mitigation to effectively integrate the residential development into the highly sensitive area.

- c. The ox-bow and peninsula of the Pūharakekenui-Styx River that is within the *“Wetland, Recreational and Open Space”* area and OSWM Zone portion of the site is recognised as an undisturbed area that supports wildlife management, which could be compromised if public access arrangements are not effectively managed. The low-lying and riparian nature of this portion of the site means that it is regularly inundated and is unlikely to be suitable for the public access. Confirmation of the likely access arrangements within the OSWM Zone portion of the site and the area described above is required. This will assist in determining the need for additional narrative in the Appendix K ODP to manage the future public access arrangement through this area of the site.
- d. It is unclear in the concept plans what is being proposed for the open/unrestored areas, including the identified willow woodland. It appears that the unformed legal road doesn’t form part of the rezoning or is this proposed to continue be farmed along with the land on the other side of the Pūharakekenui-Styx River. Please clarify what is being proposed within this portion of the OSWM Zone.
- e. It is positive to see a mix of forest and wetland areas in the concept plans. However, there needs to be a balance met between screening the site from adjacent areas and maintaining and enhancing the extensive habitats in the area (for wader species and pūkeko) and the land immediately to the north (for stilts, herons, and pūkeko). Please clarify the extent to which the extensive planting indicated in the concept plans may compromise these values.
- f. It is difficult to establish whether the concept plans indicate a bridge or boardwalk across the Pūharakekenui-Styx River and the associated wetland depicted in Appendix F. Please clarify what the intended access arrangements are within this portion of the OSWM Zone.

The CCC requests that the proponent consider the above items and address them in an updated Appendix G Graphic Attachment. This additional information is required to establish the likely activities that could feasibly establish within the *“Wetland, Recreational and Open Space”* area and OSWM Zone portion of the site and to assist in determining whether additional changes are required to the ODP in Appendix K.

PC23 has been circulated to CCC’s advisors and there have been no requests for further information on the geotechnical or wastewater aspects of the request. We are expecting advice from CCC’s appointed stormwater advisor, which will be forwarded through as soon as they are received.

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 (c.friedel@harrisingrierson.com) if any clarification on the above further information request points is needed to facilitate a response. The CCC is happy to engage with the applicant, where appropriate, to enable the Private Plan Change request to be processed in a timely manner. We can also organise meetings with the relevant technical experts if necessary.

Kind regards,

Craig Friedel
Consultant Planner
021 575 607