

PROPOSED PRIVATE PLAN CHANGE 6

OCEAN RIDGE DEVELOPMENT AREA AMENDMENTS



Plan Change Request | Assessment of Effects | Section 32 Evaluation

November 2025

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Date: November 2025
Reference: PO2060
Status: For notification



Executive summary

In 2005, the Kaikōura District Plan (Plan) was amended to create the Ocean Ridge Comprehensive Living Area. Initial subdivision and development of the area closely followed, and in 2010, a second plan change made further amendments to the applicable Plan provisions, including an increase in the number of homes enabled and refinements to the spatial and regulatory controls guiding the subdivision and development of the Area.

More recently, the Zone was subsequently renamed the Ocean Ridge Development Area (Area) and the provisions previously applicable to the zone were reorganised into multiple chapters as part of the Council's implementation of the National Planning Standards under the Resource Management Act 1991 (RMA).

This plan change request comprises a further refinement to the Plan provisions applying to the Area, some 15 years after the most recent plan change. It proposes a further increase in overall residential yield, accompanied by a corresponding increase to the existing mixed-use area within the Area to support the eventual larger population resident in the area. The Proposal also introduces opportunities for greater housing choice, with smaller lot sizes enabled in parts of the Area, and multi-unit housing being provided for subject to detailed assessment at subsequent resource consent stage.

Many of the hallmarks of the existing Area are retained, including requirements for significant areas to be revegetated in native species – both in wetland and riparian areas, and in dryland areas. Changes are proposed to the methods delivering anticipated restoration and amenity planting outcomes, but the net environmental result is anticipated to be comparable to the existing Plan approach in these respects. Namely, restoration and amenity planting will continue to be required in step with future subdivision stages in the ORD Area.

The plan change anticipates a future reserve exchange of a portion of land in Kekenō Park. Proposed Plan provisions enable that reserve land to be repurposed as part of the expanded mixed-use area should a future reserve exchange occur. Any change in reserve status would involve a separate process under the Reserves Act and is not formally part of the plan change.

The plan change request addresses all relevant requirements under the RMA, including the purpose of and reasons for the request, the relevant direction from statutory planning instruments, the actual and potential environmental effects anticipated from implementing the proposal, and the evaluation required under section 32 of the RMA.

Overall, it is concluded that:

- the proposed objective for the Area will better implement the sustainable management purpose of the RMA than the current objective;
- the proposed policies, rules and other methods are the most appropriate to implement the proposed objective and the other relevant objectives in the Plan; and
- significant positive effects are anticipated from the implementation of the Proposal, and any adverse effects will be effectively avoided, remedied or mitigated by proposed rules and other methods.

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GLOSSARY

Where used below, the following abbreviations and acronyms have the prescribed meaning:

TERM	MEANS
Council	Kaikōura District Council
ECan	Environment Canterbury
KSP	Kaikōura Spatial Plan 2024
NES	National Environmental Standard
NES-CS	National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health 2011
NES-F	National Environmental Standard for Freshwater 2020
NPS	National Policy Statement
NPS-ET	National Policy Statement on Electricity Transmission
NPS-FM	National Policy Statement for Freshwater Management
NPS-HPL	National Policy Statement for Highly Productive Land
NPS-IB	National Policy Statement for Indigenous Biodiversity
NPS-UD	National Policy Statement on Urban Development
NZCPS	New Zealand Coastal Policy Statement
NZTA	New Zealand Transport Agency Waka Kotahi
ODP	Outline Development Plan
ORD Area	Ocean Ridge Development Area
the Plan	Operative Kaikōura District Plan
Proponent	Cargill Station Limited
Proposal	Proposed Private Plan Change 6
RMA	Resource Management Act, 1991
RPS	Canterbury Regional Policy Statement

An aerial photograph of a golf course, likely at a resort. In the foreground, a clubhouse with a large roof is visible on the left. A winding road or path runs through the center of the course. To the right, there is a large, calm pond with a small fountain or structure in the middle. The background features rolling hills and a range of mountains with significant snow cover under a clear sky.

PART A

Plan Change Request & Assessment of Environmental Effects

Private Plan Change 6

Ocean Ridge Development Area Amendments

1 Overview of the Proposal

1.1 Introduction

In 2005, a private plan change request created the Ocean Ridge Comprehensive Living Zone, inclusive of objectives, policies and rules to enable the establishment of a new residential area amongst large areas of land to either be revegetated in native plants or retained in pastoral uses. Five years later, the Zone was amended by another plan change, including an increase in residential yield in the northern portions of the Zone, along with refinements to the layout of the area in the ODP and to various provisions applying at Ocean Ridge.

More recently, the Zone was subsequently renamed the Ocean Ridge Development Area and the provisions previously applicable to the zone were reorganised into multiple chapters as part of the Council's implementation of the National Planning Standards.

This Proposal comprises a further refinement to the Plan provisions applying to the ORD Area, some 15 years after the most recent plan change. It proposes a further increase in overall yield, accompanied by a corresponding increase to the existing mixed-use area within the ORD Area to support the eventual larger population resident in the area. The Proposal also introduces opportunities for greater housing choice, with smaller lot sizes enabled in parts of the ORD Area, and multi-unit housing being provided for subject to detailed assessment at subsequent resource consent stage.

Many of the hallmarks of the existing ORD Area are retained, including requirements for significant areas to be revegetated in native species – both in wetland and riparian areas, and in dryland areas. Changes are proposed to the methods delivering anticipated restoration and amenity planting outcomes, but the net environmental result is anticipated to be comparable to the existing Plan approach in these respects. Namely, restoration and amenity planting will continue to be required in step with future subdivision stages in the ORD Area.

The Proposal anticipates a future reserve exchange of a portion of land in Keken Park. Proposed Plan provisions enable that reserve land to be repurposed as part of the expanded mixed-use area should a future reserve exchange occur. Any change in reserve status would involve a separate process under the Reserves Act and is not formally part of the plan change.

These and other aspects of the Proposal, along with relevant assessments required under the RMA are set out in this report as summarised in the section that follows.

1.2 Purpose and structure of report

1.2.1 Report purpose

The purpose of this report is to describe: the Proposal; the evidence underpinning it; its anticipated effects on the environment; and the evaluation of the proposed amendments to the Plan as required by section 32 the RMA¹.

¹ Refer also Clause 22(1), Schedule 1 RMA

1.2.2 Statutory requirements

The RMA enables any person to request a change to a Plan². The request must be in writing and must explain the purpose of the Proposal and the reasons for it.³

Where environmental effects are anticipated, the request must describe those effects, taking into account the relevant clauses⁴ of RMA Schedule 4, in such detail as corresponds with the scale and significance of the actual or potential environmental effects anticipated from the implementation of the Proposal.

The request must also contain the required evaluation report in accordance with section 32 of the RMA.⁵ The overarching purpose of section 32 is to ensure that all statements, national planning standards, regulations, plans, or changes are robust, evidence-based and the best means to achieve the purpose of the RMA.

Section 32(1) of the RMA requires that an evaluation report must:

- (a) *“examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of this Act; and*
- (b) *“examine whether the provisions in the proposal are the most appropriate way to achieve the objectives by—*
 - i. identifying other reasonably practicable options for achieving the objectives; and*
 - ii. assessing the efficiency and effectiveness of the provisions in achieving the objectives; and*
 - iii. summarising the reasons for deciding on the provisions;”.*

The term ‘objectives’ has the meaning expressed at section 32(6)(a) for the purposes of this Proposal. In this instance, the objectives of the Proposal comprise those contained in the plan change request.

The evaluation report must also contain a level of detail that “corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the Proposal.”

When assessing the efficiency and effectiveness of the provisions in achieving the objectives of the Proposal, under s32(2) the report must:

- (a) *“identify and assess the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions, including the opportunities for—*
 - i. economic growth that are anticipated to be provided or reduced; and*
 - ii. employment that are anticipated to be provided or reduced; and*
- (b) *if practicable, quantify the benefits and costs referred to in paragraph (a); and*
- (c) *assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.”*

The evaluation of any intended changes to the substance of the Plan, under s32(3), must relate to:

- (a) *“the provisions and objectives of the amending proposal; and*

² Clause 21(1), Schedule 1 RMA

³ Clause 22(1), Schedule 1 RMA

⁴ Contained in Clauses 6 & 7, Schedule 4 RMA

⁵ Clause 22(1), Schedule 1 RMA

- (b) *the objectives of the existing proposal to the extent that those objectives—*
- i. *are relevant to the objectives of the amending proposal; and*
 - ii. *would remain if the amending proposal were to take effect.”*

Additional reporting requirements under section 32 are discussed at junctures below.

1.2.3 Structure of report

This report is organised to address the above statutory requirements summarised as set out in **Table 1**.

Table 1: Report Structure

Part A – Plan change request & assessment of environmental effects	
Section	Contents
Section 1 Overview	- describes the site and surrounding environment - outlines the existing provisions in the Plan relating to Ocean Ridge - sets out the purpose of, and reasons for the Proposal - describes the proposed amendments to the Plan - summarises the proposed swap of reserve land at Kekenno Park to be administered in conjunction with the plan change request
Section 2 Statutory direction	summarises the relevant statutory context for the Proposal
Section 3 Evidence & consultation	- outlines the evidence base for the proposed changes to the Plan - summarises consultation carried out by the Proponent in developing the proposed changes
Section 4 Assessment of effects	evaluates the actual and potential effects of the Proposal as required by Clause 22(2) of Schedule 1, and Schedule 4 of the RMA
Part B – Section 32 evaluation	
Section	Contents
Section 5 Scale & Significance	- evaluates the scale and significance of the effects associated with the proposed amendments in the context of s32(1)(c) - quantifies economic benefits and costs to the extent practicable
Section 6 Evaluation of objective	evaluates the proposed objective against the sustainable management purpose of the RMA
Section 7 Evaluation of Provisions & Alternatives	- evaluates the proposed provisions against the operative and proposed objectives - evaluates reasonably practicable alternative options
Section 8 Risk of Acting	discusses the sufficiency and certainty of the evidence base and associated risks of acting or not acting

1.3 Summary of existing approach

The site was first rezoned for suburban purposes via private plan change in 2005, including the establishment of the Ocean Ridge Comprehensive Living Zone. A subsequent Council-led plan change modified the ODP for the Area, including changes to the areas to be subdivided and used for residential activities, and the areas to be dedicated to restoration planting.

More recently, the Council made administrative changes to the applicable provisions to apply the format standard under the National Planning Standards across the operative Plan. Among other things, this resulted in the Ocean Ridge Comprehensive Living Zone being recast as a ‘development area’ with attendant changes made to the underlying zone structure and provisions. The ‘zone’ provisions that are particular to Ocean Ridge are currently contained in chapter DEV2 – Ocean Ridge Development Area.

Key provisions of DEV2 include the following:

- a. **Maximum Residential Units:** The plan permits a total of 336 residential units within the Development Area as a whole, with specific limits also being specified for individual sub-areas;
- b. **Non-Residential Activities:** activities such as farming, visitor accommodation, commercial uses, display homes, and recreational activities are permitted if located within specified areas and compliant with specified standards.
- c. **Landscape and Planting Requirements:** riparian, wetland and dryland areas are identified on the outline development plan for restoration planting initiatives – in elevated parts of the site, planting is required to mitigate landscape and visual effects of development, whereas the restoration planting in lower parts of the site is primarily to enhance environmental values.

A range of provisions in district-wide chapters also apply to Ocean Ridge, including the following:

- a. **Subdivision Rules:** the operative subdivision rules are multifaceted and can be summarised as follows:
 - i. *general* subdivision at Ocean Ridge is a controlled activity⁶ provided that relevant standards are complied with and no other overlay-based rules apply;
 - ii. where, for general subdivision, standards relating to lot size, servicing, access and esplanades⁷ are contravened, such proposals are restricted discretionary activities⁸ provided no other standards are contravened and no other overlay-based rules apply;
 - iii. for those parts of the site that are within the Urban Flood Assessment Overlay and/or the Debris Inundation Overlay as shown on the planning maps, subdivision is a restricted discretionary activity⁹ where it comprises new hazard sensitive building platforms in either overlay;
 - iv. any subdivision that results in additional discharge of stormwater to the Lyell Creek catchment is a discretionary activity¹⁰;
 - v. any subdivision resulting in the creation of more than 336 residential lots is a prohibited activity¹¹; and

⁶ Refer Rule SUB-R1.1

⁷ Collectively, standards SUB-S1 through SUB-S9

⁸ Refer Rule SUB-R1.2

⁹ Refer Rule SUB-R1.4

¹⁰ Refer Rule SUB-R1.10

¹¹ Refer Rule SUB-R1.16

- vi. any subdivision which does not meet any of the other zone-specific standards¹² for Ocean Ridge is a non-complying activity¹³;
- b. land use rules in the **Natural Hazards** chapter include restrictions on new¹⁴ and altered¹⁵ hazard-sensitive buildings located in those portions of the ORD Area subject to the Urban Flood Assessment Overlay and the Debris Inundation Overlay;
- c. requirements for new **roadings and other infrastructure** associated with the ORD Area are included in the Energy and Infrastructure Chapter and the Transport Chapter;
- d. the **ECO Chapter** includes rules limiting the clearance of indigenous forests, indigenous vegetation and riparian areas; and
- e. other general requirements apply to the ORD Area in the **Earthworks, Light, Noise, Signs** and **Temporary Activities** Chapters.

1.4 Purpose of the plan change

The purpose of the plan change is to enable greater housing supply and choice in the ORD Area, supported by a corresponding increase in community, commercial and other non-residential activities.

1.5 Reasons for the plan change

The Proposal is needed as the existing ORD Area provisions are inadequate to meet the housing and business needs of current and future generations. Changes are required to make the Plan more enabling of a range of housing types and densities and to overcome inefficiencies in the Plan's current regulatory settings that are a barrier to more sustainable subdivision, use and development of the ORD Area.

1.6 Overview of proposed changes

A range of amendments to the Plan are proposed as formally recorded in **Appendix 1**. As summarised further below, this includes changes to:

- a. the ODP for the ORD Area;
- b. the objective, policies, rules, standards and related provisions in the ORD Area chapter;
- c. the policies, rules and standards in the Subdivision chapter;
- d. rules and other methods in the Natural Hazards chapter;
- e. new policy and rules in the Noise chapter; and
- f. consequential changes to the Introduction, Urban Form & Development, Earthworks, Transport chapters;

¹² Refer Standards SUB-S10 and S11, exclusive of SUB-S10(1)

¹³ Refer Rule SUB-R1.13

¹⁴ Refer Rule NH-R2 and NH-R4

¹⁵ Refer Rule NH-R6, NH-R10 and NH-R11

1.6.1 Outline Development Plan

Overall format

The plan change proposes comprehensive amendments to the operative ODP, in overall appearance, structure and in the detail of spatial information displayed.

The operative ODP pre-dates major changes to the Canterbury RPS which set out detailed requirements for ODPs in Greater Christchurch. Those requirements are not directly applicable to Kaikōura in the same way; however, adopting a new format that better addresses the RPS requirements is considered good practice and will promote general regional alignment.

Moreover, since the two previous iterations of the ODP were finalised, roll out of the National Planning Standards and e-Plan formats has occurred. Among other benefits, this has enabled more widespread use of coloured maps and better integration and linkages between spatial content and associated text in Plans.

Whereas the operative ODP is limited to one overall map/plan for the ORD Area plus a detailed layout plan for existing low-density residential areas, the proposed ODP increases the number of plans to five. Consistent with Greater Christchurch ODPs, the proposed ODP also includes a narrative component which principally ties with future subdivision processes.

Overall, the proposed ODP now contains the following:

- a. **contextual information** and descriptive text to assist with wayfinding and to delineate those parts of the ORD Area which have been subject to subdivision and development to date ('Foundation Areas'), from the parts yet to be substantively developed ('Sub-Areas') – these are described in detail immediately below;
- b. **development requirements** which are to be addressed at the time of future subdivision in conjunction with the rules and standards in the Subdivision chapter;
- c. **Plan 1** – which sets out key spatial features for the ORD Area, including the Foundation Area, Sub Areas, location and alignment of existing and indicative future roads, tracks and reserves, and identified natural inland wetlands;
- d. **Plan 2** – which defines the spatial extent of different subdivision densities by minimum lot size;
- e. **Plan 3** – which replicates the second of the two operative ODP plans referred to above, and provides *indicative* lot boundaries for the new Country Living Sub-Area;
- f. **Plan 4** – which provides detail within the expanded mixed-use area, now referred to as 'The Hub Area'; and
- g. **Plan 5** – which defines overlay catchments within which future subdivision will provide for the planting of corresponding restoration and amenity planting areas.

Foundation Areas

These areas, identified on the *proposed* ODP maps as A, B, C and D respectively relate to Areas A, B, D(i) and D as shown on the *operative* ODP, with one exception – being that the remaining unsubdivided portion of Area B has been incorporated into the new Greenlane Area described shortly.

In the main, no substantive changes are proposed to these existing areas, and the land pattern has been largely set through subdivisions granted since 2005. There is scope for further subdivision of existing large lots¹⁶ in Area D at the eastern end of Ludley Drive at the same scale and intensity enabled under the operative ODP.

Greenlane Area

The new Greenlane Area comprises the areas identified as E, F and G under the operative ODP, along with the remaining un-subdivided portion of Area B noted previously. Whereas the operative ODP envisages minimum lot sizes of 500m² and a fairly ‘conventional’ suburban intensity for Greenlane relative to the balance of Kaikōura, the plan change proposes to enable smaller lot sizes down to 350m². Medium density housing is also enabled in the area but will be assessed on a case-by-case basis through future resource consent applications.

The plan change also anticipates an increase in overall residential yield in the Greenlane Area. The operative ODP allows for around 120 allotments in the area currently, but the proposed provisions would enable a theoretical maximum up to 220. As discussed below in the context of proposed rules and standards, the ultimate yield in Greenlane is not anticipated to reach this theoretical maximum – this owing to the combined maximum yield of the new Sub-Areas, in combination with the number of existing allotments in the Foundation Areas, being in excess of the overall maximum of 486 residential allotments now provided for.

Other changes in the Greenlane Area include the realignment of the proposed Ocean Ridge Drive extension and indicative local roads and in the spatial distribution of restoration and amenity planting areas. A new recreation reserve is also proposed to enhance the overall provision of off-site recreational amenity for future residents and visitors alike.

The Crest Area

The Crest Area comprises Area C as spatially defined in the operative ODP. Generally speaking, no substantive changes are proposed to the Crest in terms of anticipated yield (35 allotments), or the built form outcomes anticipated under the operative ORD Area rules and standards. Multi-unit housing is not provided for in the Crest in the same manner as the Greenlane Area.

The Farm

The area identified as The Farm on the proposed ODP comprises land classified as ‘Open Space/grazing’ in the operative ODP. As shown on proposed ODP Plan 2, the Farm is intended to provide for suburban-scale allotments towards the centre of the area, with larger ‘lifestyle’ blocks adjacent to the southern and northern boundaries. Like the Greenlane Area, provision is also made for medium density housing opportunities in the Farm, subject to future consenting processes.

The operative ODP anticipates walking tracks being provided through the Farm to the site’s western boundary adjacent to the Kowhai Stream. These linkages are retained on the proposed ODP to enhance public access between the Coast and the River.

It is in the southeastern portion of the Farm Area where the plan change provides for a new recreation reserve to be vested in Council. The current intent is for this new recreation reserve to be provided in exchange for a portion of Kekeno Park which would be repurposed for an enlarged mixed-use area in the ORD Area. The final detailed layout and purpose of the new reserve and any change in the reserve

¹⁶ The land legally described as Lot 1 DP 422084 comprises the allotments, curtilage and building areas for ‘LDR 65’, ‘LDR 66’ and ‘LDR 67’ and the anticipated Area D yield under the Subdivision and ORD Area standards is enabling of that further subdivision to occur.

status of the relevant portion of Kekenno Park would be confirmed through a separate process following the plan change being made operative.

The Hub

The Hub Area comprises the area shown as ‘mixed use’ on the operative ODP, along with those lower parts of Area D around Kersage Drive, Fidele Lane and the western extent of Ludley Drive. Its increased total area reflects the increased demand for commercial and community activities associated with the larger resident population at Ocean Ridge enabled by the plan change. The plan change anticipates larger built form in the Hub relative to other Foundation and Sub Areas – both in terms of permitted height and footprint.

New roading linkages will be formed from Kersage Drive southeast towards State Highway 1, where the ODP make provision for a left-out access onto the highway and a secondary connection to Fidele Lane. Provision is also made on the ODP for off-site shared parking areas which could provide for a more efficient layout in the central parts of the Hub and a lower overall distribution of dedicated parking areas. It is anticipated this will also support the desired slow-speed pedestrian focus of the new east-west road linkage from Kersage Drive.

The ODP also indicates various ‘green’ landscape linkages throughout the Hub Area. These will provide gaps in built form and enhance the efficient access of pedestrians, cyclists and micromobility users through the area. The linkages will generally be kept free of buildings but may afford opportunities for a range of formal and informal public spaces, street furniture, weather protection, lighting, artwork, hard and soft landscaping. Activities within new buildings adjacent to the linkages may ‘spill over’ into the linkages, for example outdoor dining areas associated with restaurants.

The ODP also indicates a green linkage along the length of the Hub Area’s boundary with State Highway 1. Buildings will be setback in this area, and landscaping will be established to soften built form when viewed from the road and in South Bay Forest Reserve to the south.

As referenced above, a portion of Kekenno Park may be repurposed for mixed-use activities as with the remainder of the Hub Area. The Proposal makes provision for that change in anticipated land use; however, that will only apply if there is a change in reserve status for that portion of Kekenno Park through a separate future process under the Reserves Act.

Country Living

The Country Living Area comprises the moderately elevated slopes about Ingles Drive and above the eastern end of Ludley Drive. The operative ODP anticipates this area to be in a combination of dryland restoration planting and open space/grazing activities. The Proposal retains that mix of activities, albeit with a change in the spatial balance and anticipated land tenure arrangements.

The operative Plan approach of retaining the entirety of the dryland planting area in a single landholding is not viable, and the Council has signalled it does not wish the land to be vested due to ongoing maintenance obligations. The area could be administered through a body corporate or other collective arrangement, but this also has efficacy shortcomings. The large lot lifestyle block format proposed by the plan change is considered to be the most sustainable option available to deliver appropriate restoration outcomes, whilst also enabling reasonable farming activities and continued public access via the track network anticipated on the operative and proposed ODPs.

Future subdivision processes will formalise new private land boundaries as indicated on ODP Plan 3, and for the establishment of wetland, riparian and dryland restoration planting now anticipated.

Appropriate legal mechanisms will be adopted at subdivision stage to provide for the ongoing protection and maintenance of plantings and for public access within the final formed track network.

The Country Living Area adopts certain requirements for new buildings that apply in Area C under the operative Plan; however, the large lot sizes, visibility of the indicative lots and anticipated restoration outcomes justify a lower level of prescription overall compared to Area C.

Other associated changes

The proposed ODP also responds to the NPS-FM by identifying natural inland wetlands within the ORD Area. These are spatially identified on ODP Plan 1 to assist with the protection and enhancement of these important features over time, and to foster the integrated management of freshwater outcomes with future subdivision and development of adjoining areas.

The overall quantum of land shown on the ODP as being set aside for restoration planting is reduced relative to the operative provisions. In summary:

- a. nearly 27ha of land already subject to successful restoration planting has been removed from the ODP – establishment, maintenance and protection of vegetation in these areas, which comprise more than 50% of the land originally envisaged for such planting, has already been provided for through previous subdivision stages, inclusive of conditions and consent notices on the relevant titles;
- b. whereas the existing restoration plan for the area envisages a further 24.6ha of restoration planting, the plan change revises that down to 18.5ha of additional planting; and
- c. the total area for restoration planting under the revised management plan is ~43ha, which is around 2ha fewer than the area required by the subdivision rules in the operative Plan¹⁷.

Notwithstanding the above changes, the plan change does not propose to reduce the planting in the most elevated parts of the site which serves a landscape and visual amenity mitigation function, particularly in Area C.

Visual amenity planting will also remain a feature within the Greenlane Area, albeit that the positioning of this planting and adjacent restoration planting areas is altered to accommodate the proposed change in alignment of the Ocean Ridge Drive extension. Visual amenity planting in the operative ODP for the more elevated parts of Greenlane is replaced with requirements for the establishment of restoration planting prior to buildings being constructed in those areas, along with new built form controls on such buildings.

1.6.2 Issues, objective & policies in the ORD Area

In general terms, there should be clear coherence between issues, objective and policies relevant to a given resource management issue (or issues). Objectives should describe outcomes to address identified issues, and the policies should implement the objectives. In the operative chapter for the ORD Area, there is a lack of coverage and coherence between these provisions.

The plan change addresses this firstly by broadening the **statement of relevant issues**. Whereas the operative chapter includes a single issue that inappropriate development can diminish conservation,

¹⁷ Standard SUB-S11.3.a. requires 1ha of planting per 7.5 residential lots. When this ratio is applied to the 336 lot maximum under SUB-S10.1, the minimum restoration area required overall is 44.8ha.

landscape and amenity values of the area, the plan change retains this issue and adds the following additional matters:

- a. as noted in the KSP recently adopted by the Council, the District lacks sufficient housing choice to support changing needs, with only 5% of lots being smaller than 500m² and 1% less than 250m²;
- b. the increase in resident population, in combination with anticipated tourism growth in the district, will raise demand for additional commercial and community activities in Ocean Ridge;
- c. as noted above in the context of the new Country Living Area on the ODP, appropriate stewardship arrangements are required for existing restoration planting areas, and new planting areas anticipated at future subdivision stages; and
- d. the importance and sensitivity of natural inland wetlands and associated riparian areas to the effects of urban development is identified, consistent with national freshwater direction.

The operative ORD Area chapter includes one **objective**, being to enable the establishment of residential activities and other associated buildings and uses that in terms of number, location and scale, sustain the conservation, landscape and amenity values experienced by locals and visitors to this part of the Kaikōura District. This clause is drafted more as a policy direction than an outcome statement and is overly narrow in scope.

The proposed objective has now been drafted as an environmental outcome to be achieved in addressing the issues identified. It makes clear that the end result will be a mixed-density residential suburb, supported by a vibrant mixed-use area all within built form that is appropriately designed and constructed in sympathy with the site context. Also explicit in the objective are the aims of providing good multi-modal transport connectivity, open space infrastructure and the retention of the operative ORD Area aims of restoration and amenity planting for landscape, visual and ecological purposes.

The proposed **policies** retain, or rephrase, much of the operative policy direction in the ORD Area chapter but also include new direction and the removal of redundant provisions as well. Policies use active language which gives effect to the relevant ‘limbs’ of the proposed objective, while also setting the groundwork for corresponding regulatory settings. In summary:

- a. the housing supply and choice and built form aspects of the proposed objective are addressed by policies DEV2-P1 through DEV2-P5, with clear direction provided on the number of residential units anticipated, the matters to be considered when assessing future proposals for any multi-unit housing and/or retirement villages, and the additional matters to consider for development proposals in the more elevated parts of the area;
- b. direction to achieve the vibrant mixed-use outcome anticipated for the Hub Area is provided in policies DEV-P5 through DEV-P7, which collectively enable a range of desirable activities where within appropriate limits and restrict other non-residential uses; and
- c. the connectivity, recreational and restoration aims in the proposed objective are implemented by policies DEV2-P10 through DEV-P12 and DEV-P15 which require mitigation and restoration planting, new open space areas, and good connectivity for all transport modes.

It is understood that the Council no longer implements a Zero Waste policy as referenced in operative policy DEV2-P11, and this clause is proposed to be deleted accordingly.

1.6.3 Rules & standards in the ORD Area

The plan change retains large portions of the operative rules and standards but also proposes a variety of amendments to better implement the new objective and revised policy framework. The proposed amendments include those of a more structural nature, and those that are more substantive.

In the latter respect, a key structural change proposed in the revised ORD Area chapter is the separation of land use and building rules. The operative rules group these components together and each rule requires full compliance with all of the 18 standards set out in the chapter. Broadly speaking, separating activities from rules allows for more targeted – and efficient – application of rules and standards without any associated reduction in effectiveness.

Also, as a structural measure to enhance efficiency, the plan change makes greater use of bespoke matters of discretion in the context of particular rules and/or standards. This represents a departure from the operative provisions which generally cross reference the broad suite of matters in Appendix 6 of the Plan.

In broad terms, the proposed regulatory approach can be summarised as follows:

- a. *residential activities* remain permitted in most parts of the ORD Area, provided they do not include the keeping of certain animals, and provided they are located within a corresponding residential unit;
- b. an associated built form rule for new buildings permits up to 486 *residential units* across the Area as a whole, subject to meeting various built form standards in much the same way as the operative plan;
- c. residential units are also limited by Sub-Area in a similar manner to the operative Plan, albeit the theoretical combined Sub-Area yield now exceeds the overall site-wide yield¹⁸ – this is to provide a greater level of flexibility at future subdivision stage to respond to housing dynamics over time, though the 486 overall yield will ultimately be the limiting factor in this regard;
- d. built form standards for residential units are retained for the Foundation Areas and for The Crest Area as per the operative Plan, and while standards at Greenlane, the Farm and the Hub are less stringent in terms of bulk and location, there are certain new requirements included in these areas to manage certain effects of built form – including light reflectance controls and the Farm Area, and bespoke building and landscaping controls in parts of the Greenlane and Hub Areas.
- e. *farming activities* also remain a permitted activity in Country Living and large-lot areas within the Farm Area;
- f. *visitor accommodation* remains a permitted activity in the Hub Area, though a new limit is imposed in standard DEV2-S3 on the overall number of rooms within the area – contravention of that limit requires a resource consent to be obtained, with Council's discretion limited to transport safety and efficiency matters;
- g. *commercial activities* generally¹⁹ remain a permitted activity in the Hub Area, with new limits on gross floor area applied for single tenancies and for the aggregate total across the area

¹⁸ In contrast to the operative approach, whereby the number of residential units in all of the various sub-areas is equal to the overall site-wide yield limit of 336 units.

¹⁹ Trade supply retail and yard-based commercial activities are excluded from the permitted activity rule and will be assessed as discretionary activities.

imposed under DEV2-S3 – non-compliance with those limits requires a resource consent to be obtained, with Council’s discretion limited to transport safety and efficiency and to potential effects on the vitality of the Township’s existing Commercial Zone and its Mixed Use Precinct;

- h. permitted activity rules in the operative Plan for *Display homes* and *Home Businesses* are retained – the former is permitted without condition, and the conditions applying to the latter have been broadened to be enabling of home business which are of a nature or scale which has minimal external effects;
- i. the National Planning Standards-derived term ‘*community facilities*’ replaces ‘community activities’ under rule DEV2-R6 and they are enabled at the Hub Area provided cumulative gross floor area limits are not exceeded – where exceedances occur, resource consent is required and Council’s discretion is limited to transport safety and efficiency and to potential effects on the vitality of the Township’s existing Commercial Zone and its Mixed Use Precinct;
- j. like the operative Plan, the proposed rules address ‘outdoor recreational activities’ distinct from other activities which could also be deemed ‘community facilities’ – such outdoor activities are permitted in the Hub Area, in existing and any future recreation reserves vested in Council and any road or walking track created as shown on the ODP, whether vested in Council or not;
- k. a new permitted activity rule is proposed for educational facilities, which are enabled at the Hub Area provided overall roll sizes do not exceed prescribed limits under DEV2-S3 – any non-compliances in that regard must be authorised by resource consent, with Council’s discretion limited to effects on the safe efficient function of the transport network;
- l. the plan change also introduces a permitted activity rule for the planting of vegetation, an activity which could be deemed a discretionary activity under the operative Plan due to its express omission;
- m. a new proposed rule permits outdoor storage of materials in the Hub Area, provided sufficient screening is provided – any non-compliance with the screening requirements requires resource consent with Council’s discretion limited to functional/operational requirements of the activities on the site, health and safety effects, and the extent to which the storage area is visible from the surrounding area;
- n. a new rule is also proposed to permit up to two *off-site shared parking areas* in identified parts of the Hub Area subject to landscaping requirements being met – where any non-compliance occurs, the activity will be assessed as a discretionary activity;
- o. a new activity rule for earthworks is included – while the operative provisions include *standards* that relate to earthworks which are generally retained, there is no corresponding rule that directly governs earthworks or provides a compliance pathway for the standards;
- p. a new activity rule is included for *retirement villages, accompanied by a companion rule for associated buildings* – both are to be assessed as restricted discretionary activities where located in the Farm or Greenlane Areas and this replaces the existing rule in the operative Plan relating to ‘rest homes’;
- q. a new proposed rule identifies heavy industrial activities as non-complying and other industrial activities as discretionary where they occur at the Hub Area – an exception is made

for industrial activities that are Home Businesses, noting that these are addressed under the new rule for the latter, inclusive of appropriate activity limits;

- r. the operative plan ‘catch-all’ rule for any activity not otherwise identified in the rule table is amended from its current non-complying activity status to discretionary;
- s. additional building and structure rules and standards apply at the Hub for non-residential activities, noting that building height is increased here from 8m in the operative Plan to 11m, with greater height provided up to 15m in the northwestern-most part of the Hub;
- t. any multi-unit housing development (comprising two or more units) is assessed as a restricted discretionary where in the Greenlane, Farm or Hub Areas, with assessments to focus on design, appearance, streetscape effects, and any boundary effects with neighbouring sites (i.e. shading, dominance, privacy);
- u. a new permitted activity rule and associated standard is proposed to manage the size and transparency of boundary fences; and
- v. new permitted activity rules for the maintenance, repair, demolition and removal of buildings and structures are provided.

1.6.4 Subdivision policies, rules and standards

The plan change proposes four main changes to the Subdivision chapter, which broadly affect:

- a. Ocean Ridge-specific direction under Policy SUB-P6;
- b. matters of control and discretion under the general subdivision rules (SUB-R1.1 and SUB-R2.2);
- c. subdivision rule SUB-R1.4 relating to proposals in that part of the ORD Area which are affected by the Urban Flood Assessment Overlay; and
- d. the two subdivision standards specific to the ORD Area, SUB-S10 and SUB-S11 and the table of allotment sizes referenced in standard SUB-S1.

Describing these further in turn, **Policy SUB-P6** enables subdivision of allotments for residential and other uses in the ORD Area provided that certain matters are addressed. The plan change refines the first of these matters (SUB-P6.4.a), by deleting the text stating that subdivision is strictly to be controlled by rules and the ODP – in general terms, it provides no value for a policy to simply state that there will be rules and other methods, but moreover, the ‘strict’ adherence to the ODP is neither necessary, nor efficient. One key difference proposed in multiple provisions within the proposed plan change is to clarify that the ODP is not necessarily the *only* way to deliver the outcome stated in proposed objective DEV2-O1 – alternatives to the ODP may well be appropriate where they can demonstrate that the net environmental outcome will be comparable or better than that anticipated in the ODP.

The proposed amendments to SUB-P6 also include the delineation of direction relating to the establishment of restoration and amenity planting areas at subdivision stage from the direction for the ongoing protection and maintenance of those areas.

Turning to the **general subdivision rules**, new matters of control are provided under SUB-R1.1 to address restoration and amenity planting details and alignment with the ODP. The former directly align with new information requirements proposed to the introduction chapter as further discussed in section 1.6.7 below.

A new matter of discretion under SUB-R1.2, the ‘default’ rule where one or more requirements of SUB-R1.1 are not met, is proposed to provide alignment with the revised policy direction summarised above regarding the ability to enable departures from the ODP where they can be shown to achieve similar or better outcomes. The exception to this is for any subdivision which exceeds the allotment caps specified under SUB-S10.1, with such proposals being assessed as fully discretionary activities.

The third main change to the subdivision chapter is to introduce an exception to rule SUB-R1.4 to align with proposed changes to the **natural hazards rules** summarised in section 1.6.5 below. In summary, where any subdivision in the Urban Flood Assessment Overlay can demonstrate that the floor levels of any associated hazard sensitive buildings within the proposed allotments are raised above the 500-year flood breakout event of the Kowhai River, consent is not required under this rule.

Turning lastly here to the changes to **subdivision standards**, it is firstly noted that SUB Table 1 sets out the minimum lot sizes that are referenced under subdivision standard SUB-S1. The operative Table includes various allotment sizes for different areas. While that approach is generally being retained, the values in the table have been deleted and a single standard is applied to the entire ORD Area be reference to the lot sizes shown on ODP Plans 2 and 3.

The first of two subdivision standards which are bespoke to the ORD Area is SUB-S10. In the operative Plan, the standard includes 10 factors, which are proposed to be simplified by the plan change. Key changes proposed include:

- a. SUB-S10.1, which echoes the maximum overall residential yield and Sub-Area yield stipulated in DEV2-S1 is amended to increase the maximum number of residential allotments to 486 with corresponding changes proposed to each of the Foundation and Sub-Area yields;
- b. subclauses 2, 3, 4 and 5 are proposed to be deleted for one of more of the following reasons:
 - i. they have either already been implemented by previous subdivision stage;
 - ii. they contain various items that are otherwise addressed by a new general requirement to be in general accordance with the ODP;
 - iii. they are drafted more as a resource consent condition than a controlled activity standard for subdivision, with compliance only able to be determined *after* the granting of consent; or
 - iv. some combination of i to iii above.
- c. Subclauses 7 and 8 are also deleted as the level crossing referred to by the former and the open space/grazing area referred to in the latter are both to be removed from the ODP;
- d. Sub-clause 6 has been amended following engagement with NZTA, inclusive of the deletion of any reference to the 40th allotment in Residential Area B as a trigger for the proposed new roading connection to Green Lane being open for vehicle use – the amendments to the ODP and associated yields mean that 40 lots will not be developed in Area B and this aspect of the standard is redundant; and

- e. The final sub-clause regarding alignment with lot size and shape on the ODP is broadened to require general alignment with all spatial information on the ODP plans and the development requirements in part 3.0 of the proposed ODP.

The second of the Ocean Ridge-specific standards, SUB-S11, is proposed to be deleted; however, this is largely an organisational change rather than a substantive one. The plan change proposes to re-house the content of the standard in the ODP development requirements, changes to the information requirements for subdivision summarised in section 1.6.7 below or a combination of the two. Some modifications are proposed to enhance efficacy or clarity, whilst the opportunity has also been taken to delete clauses now deemed to be redundant. In summary:

- a. Subclause 1 is deleted to reflect the proposed change to land ownership/stewardship of dryland restoration planting areas – dryland planting areas are no longer intended to be held in one single record of title;
- b. Subclauses 2 and 3 are recast as ODP development requirement 3.5 with further detail to be provided at subdivision stage in newly introduced information requirements for consent applications;
- c. Subclause 4 is recast as ODP development requirement 3.6, noting also that subdivision consent has been granted for all lots in Area C, subject to related conditions;
- d. Subclauses 5 and 6 are recast as ODP development requirement 3.7, noting however that the proposed realignment of the Ocean Ridge Drive extension and inclusion of a new restoration planting area in the vicinity of the new rail crossing means a lesser quantum of visual integration is required along the boundary with the railway; and
- e. Clustered street tree planting required under subclause 7 is removed – however new requirements for planting and built form in this area are introduced as alternative measures to address landscape and visual amenity effects.

New **defined terms** are provided in the introduction to the chapter, along with **nesting tables** to assist with clear interpretation of the provisions in the ORD Area chapter. Where possible, terms and definitions from the National Planning Standards have been used.

1.6.5 Natural hazards rules and methods

The plan change proposes the inclusion of a new rule and appendix in the Natural Hazards chapter, along with consequential amendments to existing rules that would otherwise apply.

The proposed **new rule** – NH-R14 – permits new hazard sensitive buildings, additions to existing hazard sensitive buildings, or change of building use to hazard sensitive activity in the ORD Area where within the Urban Flood Assessment Overlay where located in the Hub Area, or where located in the Farm Area and the floor level of any relevant building is raised above the 500-year flood breakout event for the Kowhai River. Detail for achieving compliance with the latter is set out in a new contour map in proposed **NH-Appendix 1**.

Consequential changes are proposed to all the general Natural Hazard rules that would otherwise apply to new hazard-sensitive buildings, additions to such buildings or change of use for such buildings²⁰ to clarify those rules do not apply in the ORD Area.

1.6.6 Noise provisions

In consultation with NZTA and KiwiRail, the plan change proposes new management measures for buildings containing noise sensitive activities where located in close proximity to State Highway 1 and the Main North Line railway. Such buildings will need to be designed and constructed in a manner that provides acoustic mitigation, including mechanical ventilation where compliance relies upon windows being closed.

The plan change proposes the following amendments to the noise chapter to deliver these measures:

- a. cross references to Issue UFD-I1 and Objectives UFD-O2 and TRAN-O1 are respectively provided under Issue NOISE-I1 and Objective NOISE-O1 to illustrate the linkage between the efficient function of transport infrastructure and the management of adverse effects on that infrastructure as relates to noise;
- b. a new policy NOISE-P4 is included to signal the need for acoustic mitigation and ventilation requirements where new noise sensitive activities are proposed in proximity to the State Highway or the Main North Line;
- c. the existing noise standards for the ORD Area under NOISE-S5 are expanded to establish minimum acoustic performance standards, ventilation requirements, certification requirements and associated matters of discretion where requirements are not met; and
- d. a new schedule of building materials at NOISE- Table 2 which can be used as a ‘pre-approved’ means of achieving compliance with the new standards.

1.6.7 Consequential changes to other chapters

The plan change proposes several amendments to other chapters for integration purposes, including:

- a. the Introduction chapter;
- b. the strategic directions in the Urban Form and Development chapter;
- c. the Earthworks chapter; and
- d. the Transport chapter.

Summarising these in turn, a new information requirement has been added to the **Introduction chapter**. This requires future subdivision applications to produce a restoration planting plan for the stage of subdivision applied for. The planting plan is to be based on the alternative restoration management plan produced by Morphem Environmental in support of the plan change request, and provide related detail on a range of relevant factors to ensure the effective establishment, maintenance and protection of restoration planting areas. As noted in section 1.6.4 this change integrates with newly proposed matters of control and discretion for subdivision.

²⁰ Respectively, Rules NH-R2, NH-R6 and NH-R10

Nesting tables are also proposed – as enabled by the National Planning Standards – to illustrate connections between various related terms, again to assist clear administration of the Plan in the future.

Several consequential changes are proposed to the **Urban Form and Development chapter**. For example, policy UFD-P7 has been amended to clearly refer to the ORD Area. The operative drafting is unnecessarily vague in its reference to a ‘comprehensive living environment just west of Kaikōura Township’, and this amendment provides greater clarity. Related refinements are proposed to the Principal Reasons under UFD-PR1, both to correct references to the ORD Area and to reflect various changes arising from the plan change request.

Cross references have been added to the new ORD Area-specific earthworks rule in the **Earthworks chapter**. Given the multi-faceted nature of the relevant standards in the operative and proposed standards in the ORD Area chapter that relate to earthworks, this approach is considered more appropriate than creating a new rule in the earthworks chapter and reverse engineering the content of the existing standards into the Earthworks chapter.

One consequential change is also proposed to the **Transport chapter**. In the same way that the Kaikōura Peninsula Tourism Development Area is exempt from the high traffic generator standard TRAN-S4 where certain thresholds are met, a new exemption is provided for the ORD Area where floor area limits specified under proposed DEV2-S3 are met. This recognises that the plan change has been informed by a detailed transportation modelling exercise which finds that anticipated traffic volumes from the increased household yield and permitted non-residential activities in the Hub Area can be accommodated without compromising the safe, efficient function of the transport network.

1.7 Kekeno Park - potential future reserve exchange

Kekeno Park is a recreation reserve vested in Council through previous subdivision of land in the ORD Area. Adjacent to Ocean Ridge Boulevard and Kersage Drive, the park comprises a small pond surrounded by native planting and hard landscaping features, including a pergola, footbridge, stone artwork and footpaths. The balance of the Park to the east is in grass, a portion of which comprises a sunken kidney-shaped ‘dry’ basin which is designed to function as an auxiliary detention area during extreme surface flooding events.

The plan change anticipates that this dry basin can be repurposed as part of the new expanded Hub Area, subject to the reserve status of the land being changed through a future process under the Reserves Act.

Plan provisions are proposed to enable a smooth transition from reserve classification to mixed-use function for this portion of Kekeno Park following any future reserve exchange purpose. If the reserve exchange does not occur for whatever reason, the basin will remain in the park as-is. Relevant technical investigations²¹ supporting the plan change demonstrate that scenarios with and without the future reserve exchange are capable of delivering appropriate outcomes.

²¹ Refer for example Appendices 7, 8 and 11

2 Regulatory and policy direction

In carrying out a s32 analysis, an evaluation is required of how the Proposal achieves the purpose and principles contained in Part 2 of the RMA.

Section 5 sets out the purpose of the RMA, which is to promote the sustainable management of natural and physical resources.

Sustainable management ‘means managing the use, development, and protection of natural and physical resources to enable people and communities to provide for their social, economic and cultural wellbeing and for their health and safety, while -

- (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and
- (b) safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and
- (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment’.

In achieving this purpose, all persons exercising functions and powers under the RMA also need to:

- Recognise and provide for the matters of national importance identified in s6
- Have particular regard to the range of other matters referred to in s7
- Take into account the principles of the Treaty of Waitangi/Te Tiriti o Waitangi in s8.

2.1 Section 6

The s6 matters relevant to this topic are summarised in **Table 2**:

Table 2: Matters of National Importance

Section	Relevant Matter
6(a)	<i>the preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development</i> The proponent has commissioned an expert delineation assessment of natural inland wetlands and associated surface waterbodies on the site, which have been identified on the Outline Development Plan. While no formal delineation of the coastal environment has been carried out by the Proponent for the ORD Area or by the Council for the district more broadly, it is assumed that the lower parts of the site are proximate to the coastal environment.
6(c)	<i>the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna</i> The ORD Area contains large areas of existing restoration planting which would classify as areas of significant indigenous vegetation. It also proposes to create additional such areas over time in step with future subdivision stages.

Section	Relevant Matter
6(d)	<i>the maintenance and enhancement of public access to and along the coastal marine area, lakes, and rivers</i> The operative and proposed provisions in the Plan provide for multi-modal access through the ORD Area, including towards the coast to the south and the Kowhai River to the west.
6(e)	<i>the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga</i> Te Rūnanga o Kaikōura are the representative body of Ngāti Kuri, the tangata whenua who have manawhenua in the area comprising the ORD Area.²² Reference has been made to the Rūnanga's Environmental Management Plan in preparing this Proposal, and the proponent has met three times with Rūnanga representatives. The Rūnanga are ultimately best to speak to the relevance of this matter to the Proposal, as reflected in the management plan²³.
6(f)	<i>the protection of historic heritage from inappropriate subdivision, use, and development</i> Known archaeological sites have been identified in the ORD Area, and future subdivision, use and development of the area may lead to discovery of additional sites.
6(h)	<i>the management of significant risks from natural hazards</i> Like much of Kaikōura, parts of the ORD Area are subject to potential risks from natural hazards, including land instability, liquefaction and fluvial flood hazards.

2.2 Section 7

The s7 matters that are relevant to this topic are summarised in **Table 3**:

Table 3: Section 7 RMA matters

Section	Relevant Matter
7(a) and (aa)	<i>(a) kaitiakitanga</i> <i>(b) the ethic of stewardship</i> Kaitiakitanga is defined in the RMA as the exercise of guardianship by the tangata whenua of an area in accordance with tikanga Maori in relation to natural and physical resources; and includes the ethic of stewardship. Te Rūnanga o Kaikōura are kaitiaki in the area comprising the ORD Area. As noted in the Rūnanga's Environmental Management Plan, the Runanga is best placed to comment in this respect²⁴.

²² Te Poha o Tohu Raumati: Te Rūnanga o Kaikōura Environmental Management Plan 2007, p.3

²³ Te Poha o Tohu Raumati: Te Rūnanga o Kaikōura Environmental Management Plan 2007, p.24

²⁴ Te Poha o Tohu Raumati: Te Rūnanga o Kaikōura Environmental Management Plan 2007, p.24

Section	Relevant Matter
	The ethic of stewardship is also relevant to various aspects of the Proposal, inclusive of the on-going maintenance and enhancement of riparian, wetland and terrestrial ecological values.
7(b)	<i>the efficient use and development of natural and physical resources</i> Several natural and physical resources are managed by existing and proposed provisions in the Plan, including land, water, ecosystem health and coastal areas.
7(c)	<i>the maintenance and enhancement of amenity values</i> Existing and proposed provisions in the Plan also provide for the maintenance and enhancement of amenity values.
7(d)	<i>intrinsic values of ecosystems</i> The ORD Area has been developed with a view of maintaining and enhancing ecological values, and this acknowledgement of intrinsic ecological value remains an express tenet of the Proposal.
7(f)	<i>maintenance and enhancement of the quality of the environment</i> Existing and proposed provisions applying to the ORD Area are geared towards quality design outcomes and an overall character defined by a suburban neighbourhood in a setting with enhanced aquatic, wetland and terrestrial environmental values.
7(i)	<i>the effects of climate change</i> Climate change impacts, including their contribution to the frequency and consequences of natural hazard events, have been accounted for in operative and proposed provisions relating to the ORD Area. Allowing for climate change effects in determining the design, scale and function of supporting infrastructure is also a relevant consideration.

2.3 Section 8

The proponent met twice with representatives of Te Rūnanga o Kaikōura in the first half of 2025, and again at a third hui with the Rūnanga executive in early September. While additional discussions between the parties were scheduled for the middle of the year, they were postponed for a variety of reasons, and no formal feedback has been obtained from the Rūnanga prior to lodgement.

The proponent has signalled its commitment to continuation of dialogue with the Rūnanga to better understand relevant values and how the Proposal may address those. In the meantime, the proponent has referred to the Rūnanga's environmental management plan to inform the Proposal; however, the proponent also acknowledges the clear statements in the management plan that it:

- is not intended as a substitute for consultation with the Rūnanga;
- is a document to provide a basis for understanding Rūnanga values and related policy; and

- c. is a living, working document which the Rūnanga reserves the right to update and revise over time.²⁵

Opportunity is available for Te Rūnanga o Kaikōura to participate through post-lodgement, notification, hearing and associated processes and the proponent has also expressed a desire to meet further with the Rūnanga following lodgement.

In the meantime, no conclusions are drawn in respect of section 8 of the RMA.

2.4 National Direction

2.4.1 National Policy Statements

There are eight National Policy Statements currently in force:

- NPS for Electricity Transmission 2008
- New Zealand Coastal Policy Statement 2010
- NPS for Renewable Electricity Generation 2011
- NPS for Freshwater Management 2020
- NPS on Urban Development 2020
- National Policy Statement for Highly Productive Land 2022
- National Policy Statement for Greenhouse Gas Emissions from Industrial Process Heat 2023
- National Policy Statement for Indigenous Biodiversity 2023

The instruments and associated provisions relevant to this topic are set out in **Table 4** below. The remaining instruments have little or no relevance to the Proposal for the following reasons:

- a. the NPS-ET is not relevant to the plan change as the electricity assets (conductors and support structures) in the ORD Area are part of the MainPower electricity distribution network and no longer part of the National Grid;
- b. while renewable electricity generation activities might occur in the ORD Area in the future, no such activities are proposed by the plan change and the substance of the corresponding NPS is otherwise not particularly relevant;
- c. likewise, no activities involving industrial process heat are anticipated or enabled by the plan change and the NPS for Greenhouse Gas Emissions from Industrial Process Heat is not relevant;
- d. the NPS-HPL is not relevant as the ORD Area does not comprise any ‘highly productive land’ as defined in this NPS – specifically:
 - i. no part of the ORD Area is zoned “general rural” or “rural production” in the operative Plan, which has been amended to implement the National Planning Standards;
 - ii. the Canterbury RPS has not been amended to contain maps of highly productive land; and
 - iii. the applicable transitional definition of ‘highly productive land’ under Clause 3.5(7) excludes the ORD Area; and

²⁵ Te Poha o Tohu Raumatī: Te Rūnanga o Kaikōura Environmental Management Plan 2007, p.iv

- e. the NPS-UD is not applicable as Kaikoura does not comprise an ‘urban environment’ under the NPS²⁶, and the Council is not a Tier 1, 2 or 3 local authority as defined in the NPS.

Table 4: Relevant national policy instruments

NPS	Relevant Objectives / Policies
NZCPS 2010	The proponent is not aware of any detailed mapping of the Coastal Environment for the Kaikoura District to confirm whether any part of the ORD Area is within the Coastal Environment. that the proponent has considered whether the lower portions of the site <i>might</i> be comprised within the coastal environment based on the factors identified in NZCPS Policy 1; however, in post-lodgement exchanges with the Council and its technical experts the plan change assumes the ORD Area is proximate to, but not within, the coastal environment. Given that proximity and taking an integrated management approach to natural and physical resources, it is relevant to consider the direction set out NZCPS: • Policy 2, regarding the Treaty of Waitangi and kaitiakitanga as relates to the coastal environment; • Policy 4, regarding integrated management of resources, and in particular the need to consider whether land use activities might affect water quality in the coastal environment and marine environment – including through sedimentation effects; • Policy 6, regarding: – the consideration of the rate of built development and associated infrastructure to provide foreseeable needs of population growth without compromising other values and the encouragement of consolidated urban form to avoid sporadic or sprawling patterns of growth; – consideration where development maintains character of existing built environment should be encouraged and where development resulting in a change of character is acceptable; – consideration of visual impact of developments, including on prominent ridgelines, and the use of controls or conditions to avoid effects; • Policy 11, regarding the protection of indigenous biodiversity in the coastal environment; • Policy 13, regarding the preservation of natural character in the coastal environment and its protection from inappropriate subdivision, use and development; • Policy 15, regarding the protection of natural features and landscapes of the coastal environment from inappropriate subdivision, use and development

²⁶ The ‘usually resident’ population for Kaikoura derived by the 2023 census was 4,215. Current projections by Statistics New Zealand under a high growth scenario to 2048 is a population of 5,100. This falls well short of the minimum housing and labour market of 10,000 people to meet the definition of ‘urban environment’ under the NPS. Projections retrieved August 2025 from <https://explore.data.stats.govt.nz/>

NPS	Relevant Objectives / Policies
	• Policy 18, regarding the need for public open space within and adjacent to the coastal marine area for public use and appreciation; • Policy 19, regarding the maintenance and enhancement of walking access to, along and adjacent to the coastal marine area; • Policy 21, regarding water quality in the coastal environment; • Policy 22, regarding sedimentation effects on the coastal environment, including from subdivision, use and development; • Policy 23, regarding discharge of other contaminants to water in the coastal environment; and • Policy 25, regarding coastal hazard risks.
NPSFM 2020	The NPS-FM sets out the objectives and policies for freshwater management under the RMA. The fundamental concept underpinning the NPS-FM is Te Mana o te Wai, being the fundamental importance of water and recognition that protecting the health of freshwater protects the health and wellbeing of the wider environment. It is about the protection of the mauri of water and the restoration and preservation of the balance between water, the wider environment and the community. Te Mana o Te Wai encompasses 6 principles: mana whakahaere; kaitiakitanga; manaakitanga; governance; stewardship; and care & respect. It prioritises the health and wellbeing of waterbodies and freshwater ecosystems over health needs of people and the ability of people and communities to provide for their wellbeing now and in the future. The sole objective of the NPS-FM echoes this latter prioritisation hierarchy as the outcome for the management of natural and physical resources under the NPS. That sole aim is implemented by 15 policies, including of most relevance here: • Policy 1, that water is managed in a way that gives effect to Te Mana o te Wai; • Policy 2, that tangata whenua are actively involved in freshwater management and Māori freshwater values are identified and provided for; • Policy 3, directing the integrated management of freshwater and the use and development of land; • Policy 4, addressing the relevance of freshwater management to New Zealand's response to climate change; • Policy 5, regarding the national objectives framework and direction to improve health and well-being of degraded water bodies and associated ecosystems, and to maintain or improve all other water bodies and associated ecosystems; • Policy 6, that there is no further loss in extent of natural inland wetlands, that their value is protected and their restoration promoted;

NPS	Relevant Objectives / Policies
	• Policy 7, that the loss of river extent and values are avoided to the extent practicable; • Policy 9, that the habitats of indigenous freshwater species are protected; • Policy 11, that freshwater is allocated and used efficiently with existing over-allocation phased out and future over-allocation prevented; and • Policy 15, that communities are enabled to provide for their social, economic and cultural wellbeing in a manner consistent with the NPS.
NPSIB 2023	The NPS-IB applies to indigenous biodiversity in the terrestrial environment. It prioritises the mauri and intrinsic value of indigenous biodiversity and recognises people's connections and relationships with indigenous biodiversity. The sole objective of the NPS-IB is to maintain indigenous biodiversity so that there is at least no overall loss after commencement of the NPS. The objective clarifies that it is to be achieved by: • recognising mana of tangata whenua as kaitiaki; • recognising people and communities, including landowners, as stewards of indigenous biodiversity; and • protecting and restoring indigenous biodiversity as necessary; while • providing for the social, economic and cultural wellbeing of people and communities now and into the future. Relevant policies include: • Policy 1, that indigenous biodiversity is management in a way that gives effect to identified decision-making principles and takes into account the principles of the Treaty of Waitangi; • Policy 2, that tangata whenua exercise kaitiakitanga in their rohe; • Policy 3, that a precautionary approach is adopted when managing indigenous biodiversity; • Policy 4, that indigenous biodiversity is managed to promote resilience to climate change effects; • Policy 5, that indigenous biodiversity is managed in an integrated way; • Policy 7, that significant natural areas are protected by avoiding or managing adverse effects from new subdivision, use and development; • Policy 8, that the importance of maintaining indigenous biodiversity outside those areas is recognised and provided for; • Policy 9, which provides for certain activities within significant natural areas and Policy 10 which recognises and provides for activities that contribute to New Zealand's social, economic, cultural and environmental wellbeing as set out in the NPS; and • Policy 13, that the restoration of indigenous biodiversity is promoted and provided for and Policy 14 that increased vegetation cover is promoted in both urban and non-urban areas.

2.4.2 Proposed National Policy Statements

Central Government consulted on major reforms to existing national direction between May and August of 2025, spanning infrastructure and development, primary sector, freshwater, and housing topics.

At the time of writing, no formal changes have been adopted to relevant national direction.

2.4.3 National Environmental Standards

In addition to the NPSs there are ten National Environmental Standards (NES) currently in force:

- NES for Air Quality 2004
- NES for Sources of Human Drinking Water 2007
- NES for Electricity Transmission Activities 2009
- NES for Assessing and Managing Contaminants in Soil to Protect Human Health 2011
- NES for Telecommunication Facilities 2016
- NES for Freshwater 2020
- NES for Marine Aquaculture 2020
- NES for Storing Tyres Outdoors 2021
- NES for Commercial Forestry 2023
- NES for Greenhouse Gas Emissions from Industrial Process Heat 2023

The relevant national environmental standards for this Proposal are summarised in **Table 5**:

Table 5: Relevant national environmental standards

NES	Relevant Regulations
NES-CS 2011	The NES-CS applies to certain activities – including subdivision and land use change – proposed to be carried out on land that is contaminated or potentially contaminated (where an activity listed in The Ministry for the Environment’s Hazardous Activities and Industries List is being undertaken, has been undertaken or is more likely than not to have been undertaken on that ‘piece of land’). The NES-CS classifies these activities as permitted where the certain requirements are met, including (for subdivision and land use change): • a preliminary site investigation of the land or piece of land must exist; • the report on the preliminary site investigation must state that it is highly unlikely that there will be a risk to human health if the activity is done to the piece of land; • the report must be accompanied by a relevant site plan to which the report is referenced; and • the consent authority must have the report and the plan. Any subdivision or change in land use that fails to comply with one or more the above falls as a controlled activity under Regulation 9, provided that: • a detailed site investigation of the piece of land must exist; • the report on the detailed site investigation must state that the soil contamination does not exceed the applicable standard in regulation 7;

	- the consent authority must have the report; and - conditions arising from the application of the relevant matters of control, if there are any, must be complied with. Any subdivision or change in land use that fails to comply with one or more the above falls as a restricted discretionary activity under Regulation 10, provided that: - a detailed site investigation of the piece of land must exist; - the report on the detailed site investigation must state that the soil contamination exceeds the applicable standard in regulation 7; - the consent authority must have the report; and - conditions arising from the application of the relevant matters of discretion, if there are any, must be complied with. Any subdivision or change in land use that is not permitted, controlled or restricted discretionary must be assessed as a discretionary activity under Regulation 11.
NES-F 2020	The NES-F are relevant to the regional functions administered by ECan. It is noted, however, that certain regulations under the NES-F <i>might</i> apply to future activities associated with the use and development of the ORD Area, including: - the regulations in Part 2 of the NES-F regarding various farming activities; - the regulations in Part 3, subpart 1 regarding the management of effects of land use and development on natural inland wetlands; and - the regulations in Part 3, subpart 3 regarding passage of fish affected by various structures in waterbodies.

2.5 Regional Policy and Plans

2.5.1 Regional Policy Statement

Table 6 below identifies the relevant provisions and resource management topics for the Proposal contained in the RPS.

Table 6: Relevant provisions of the RPS

Chapter	Relevant provisions
Chapter 4 Provision for Ngāi Tahu and their relationship with resources	Chapter 4 sets out various tools and processes to sustain good working relationships and building trust essential to recognising and providing for the relationships between Ngāi Tahu and natural resources. Of relevance to the Kaikōura District Council as a territorial authority in the Canterbury Region:

Chapter	Relevant provisions
	• Clause 4.3.15 directs that provisions for the relationship between Ngāi Tahu, their culture and traditions, and their ancestral lands, water, sites, wāhi tapu and other taonga are included in the District Plan; • Clause 4.3.16 directs that methods are included in the Plan for the protection of Ngāi Tahu ancestral lands, water, sites, wāhi tapu and other taonga; • Clause 4.3.17 directs that any iwi management plans be taken into account during Plan development; and • Clause 4.3.19 directs that the Council should consider appointment of tangata whenua commissioners on plan development matters, particularly when making decisions on issues of resource management significance to Ngāi Tahu as set out in Chapter 2 of the RPS.
Chapter 5 Land use and infrastructure	Chapter 5 of the RPS relates to infrastructure and land use development. The following provisions in Chapter 5 are particularly relevant to the Proposal: • Objective 5.2.1, that development is located and designed so that it functions in a way that: – achieves consolidated, well designed and sustainable growth in and around existing urban areas; – maintains and enhances the quality of the natural environment; – provides sufficient housing choice to meet the region’s housing needs; – encourages sustainable economic development by enabling businesses in appropriate locations; – is compatible with, and will result in continued safe, efficient and effective use of regionally significant infrastructure; and – avoids conflict between incompatible activities; • Objective 5.2.2, that patterns and sequencing of land use with regionally significant infrastructure is well integrated with the result being enhanced sustainability, efficiency and liveability; • Objective 5.2.3, for a safe, efficient transport network that supports a consolidated and sustainable urban form; • Policy 5.3.1, that sustainable development patterns are provided which: – ensure urban²⁷ and limited rural residential growth occur in a form that concentrates, or is attached to, existing urban areas and promotes a coordinated pattern of development; – encourage housing choice, recreation and community facilities and business opportunities of a character and form that supports urban consolidation;

²⁷ In contrast to the NPS-UD, Kaikōura is consistent with the RPS definition of ‘urban’ in the wider region context under Chapter 5, being ‘a concentration of residential, commercial and/or industrial activities, having the nature of town or village which is predominantly non-agricultural or non-rural in nature.’

Chapter	Relevant provisions
	– maintain and enhance the sense of identity and character of the region's urban areas and encourage high quality urban design and associated maintenance and enhancement of amenity values; • Policy 5.3.2 which is <i>enabling</i> of development which: – avoids, remedies or mitigates adverse effects, including which might compromise or foreclose: regionally significant infrastructure; options for accommodating consolidated urban growth of existing urban areas; productivity of the region's soil resources; water for community supply; or significant natural and physical resources; – avoids or mitigates effects from natural hazards and reverse sensitivity effects; and – integrates with efficient and effective infrastructure and multi-modal transport networks; • Policy 5.3.3, to ensure that substantial developments are well designed, robust and resilient: including through promoting an associated diversity of residential, employment and recreational choices; and where amenity values, the quality and character of the local environment are maintained or enhanced; • Policy 5.3.5 to ensure development is appropriately and efficiently served for collection, treatment, disposal or re-use of water and stormwater and the provision of potable water by: avoiding development which cannot be served in a timely manner; and requiring services to be designed, built, managed and upgraded to maximises effectiveness; • Policy 5.3.6 which: – avoids development which constrains on-going ability of three waters infrastructure to be developed and used; – enables of three waters infrastructure to be developed and used provided effects are sufficiently managed; and – discourages three waters infrastructure which will promote developments that do not meet Policy 5.3.1; • Policy 5.3.7 to avoid development which adversely affects the safe, efficient, effective function of the strategic transport network or which forecloses opportunity of the network to meet future needs; • Policy 5.3.8 to integrate land use and transport planning in a way that: – promotes modes with low adverse effects and the safe, efficient, effective use of transport infrastructure that reduces transport demand; and – avoids or mitigates conflict between incompatible activities; • Policy 5.3.9 to: – avoid development which constrains the ability of regionally significant infrastructure to be developed and used with constraints arising from reverse sensitivity or safety matters; and – provide for expansion of existing infrastructure and development of new infrastructure while recognising technical and operational requirements and provided effects are appropriately avoided, remedied or mitigated;

Chapter	Relevant provisions
	• Policy 5.3.12, which avoids development or fragmentation that forecloses the ability to make appropriate use of land for primary production or results in reverse sensitivity effect that would result in the same;
Chapter 7 Freshwater	While freshwater management is principally a matter for ECan in the exercise of its functions under the RMA, the plan change request has taken direction from the RPS objectives and policies in Chapter 7 to the extent relevant. The following provisions are particularly relevant: • Objective 7.2.1, regarding the sustainable management of freshwater; • Objective 7.2.2, regarding processes for managing abstraction activities and development of water infrastructure; • Objective 7.2.3, that the quality of freshwater in the region is maintained or improved and associated ecosystem processes and values are safeguarded; • Objective 7.2.4, regarding integrated management of freshwater and associated considerations; • Policy 7.3.1, regarding the identification of natural character values of freshwater bodies and their margins, and the preservation, maintenance or improvement of those values; • Policy 7.3.3, to promote and require protection, restoration and improvement of lakes, rivers and wetland • Policy 7.3.4, regarding the management of surface and groundwater abstraction and the relationship with water quality; • Policy 7.3.5, to manage adverse effects of land use activities on surface flows and groundwater recharge; • Policy 7.3.7, to manage adverse effects of land use change on water quality; • Policy 7.3.8, to improve efficient allocation and use of freshwater, including for reticulated drinking supply infrastructure; • Policy 7.3.10, regarding the benefits of water harvesting and storage; • Policy 7.3.11, to adopt a precautionary approach to allocation of abstracted water, land use intensification or contaminant discharges where effects are unknown or uncertain; and • Policy 7.3.13, which encourages involvement of community, tangata whenua and consent holders in resolving local freshwater management issues.
Chapter 8 Coastal Environment	As discussed above in the context of the NZCPS, it has been assumed that at least the lower parts of the ORD Area near State Highway 1 are proximate to the coastal environment; and in any case, there is cause to consider relevant direction given the proximity and interconnectedness of the site with certain coastal processes and ecological values – most notably in relation to the transport and discharge of sediment and other contaminants to the CMA, the potential impacts of extreme tsunami events and/or habitat opportunities for coastal fauna. Relevant provisions in RPS Chapter 8 include:

Chapter	Relevant provisions
	• Objective 8.2.3, that subdivision, use or development in the coastal environment does not adversely affect efficient use and development of regionally significant infrastructure; • Objective 8.2.4, regarding the protection of natural coastal character from inappropriate subdivision, use and development and the restoration of associated natural, ecological, cultural, amenity, recreational and heritage values; • Objective 8.2.5, regarding the maintenance and enhancement of public access and access by Ngāi Tahu to and along the CMA; • Objective 8.2.6, that coastal water quality and associated values are protected from significant adverse effects of discharges, and enhanced where degraded; • Policy 8.3.2, to provide for the integrated management of resources and activities in the coastal environment; • Policy 8.3.4, regarding the preservation and restoration of natural character; • Policy 8.3.5, regarding the maintenance and enhancement of access to and along the CMA; • Policy 8.3.6, regarding regionally significant infrastructure, including avoidance of development resulting in reverse sensitivity effects; and • Policy 8.3.8, to manage discharges of contaminants to the CMA to maintain natural state of coastal water;
Chapter 9 Coastal Environment	The restoration and enhancement of ecological values has been a long-standing component of the subdivision, use and development of the ORD Area – and this approach will continue under the plan change Proposal. Relevant RPS direction in this regard includes: • Objective 9.2.1, that the decline in quality and quantity of ecosystems and indigenous biodiversity is halted, and their life-supporting capacity and mauri are safeguarded; • Objective 9.2.2, that ecosystem function and indigenous biodiversity are restored or enhanced in appropriate locations; • Objective 9.2.3, that areas of significant indigenous vegetation and significant habitat for fauna are identified and protected; • Policy 9.3.1, which sets out direction for the identification and protection of significant natural areas; • Policy 9.3.2, which established priorities for protection, including wetland vegetation and habitats of threatened or at-risk indigenous species; • Policy 9.3.3, to adopt and integrated and coordinated management approach to halting the decline of indigenous biodiversity; • Policy 9.3.4, which promotes the enhancement and restoration of ecosystems and indigenous biodiversity; and • Policy 9.3.5, regarding the protection and enhancement of existing wetlands, and the promotion of newly created wetland areas.

Chapter	Relevant provisions
Chapter 10 Beds of rivers, lakes and riparian margins	Intermittent and ephemeral streams have been identified in the ORD Area, and the following direction in RPS Chapter 10 has informed the Proposal in this regard: • Objective 10.2.1, which enables subdivision, use and development of river and lake beds and associated riparian zones while protecting and enhancing significant values of those features; • Objective 10.2.2, that flood carrying capacity of rivers is maintained; • Objective 10.2.4, that access to and along rivers and lakes is maintained or enhanced; • Policy 10.3.1., regarding the management of planting and removal of vegetation and other activities in riverbeds and margins; • Policy 10.3.2, to preserve the natural character of riverbeds and their margins and protect them from inappropriate subdivision, use and development; and • Policy 10.3.5, regarding the maintenance and enhancement of access to and along rivers and their margins.
Chapter 11 Natural Hazards	The ORD Area includes land that may be susceptible to the effects of various natural hazards, including fluvial flooding, tsunami, land instability and liquefaction. The relevant direction in RPS Chapter 11 includes: • Objective 11.2.1, regarding the avoidance of new subdivision, use or development which increases risk of hazards to people, property or infrastructure – or where avoidance is not practicable, mitigation to minimise risks; • Objective 11.2.2, that adverse effects on people, property, infrastructure and the environment resulting from hazard mitigation measures are avoided where possible, or mitigated where not possible; • Objective 11.2.3, that the effects of climate change on sea level rise and frequency and severity of hazard events are recognised and provided for; • Policy 11.3.1, to avoid new subdivision, use and development of land in high hazard areas unless certain criteria are satisfied; • Policy 11.3.2, to avoid new subdivision, use and development of land otherwise subject to inundation in a 0.5% AEP event unless certain criteria are satisfied; • Policy 11.3.3, to manage effects of fault rupture, liquefaction or lateral spread associated with new subdivision, use or development in areas subject to such hazards; • Policy 11.3.4, to locate new critical infrastructure outside high hazard areas unless no reasonable alternatives exist; • Policy 11.3.5, regarding the general approach to assessing hazard risk by combining the likelihood and consequences of relevant events; • Policy 11.3.6, that the role of natural features which assist in managing hazard effects are recognised, and that the features are protected/restored where appropriate;

Chapter	Relevant provisions
	• Policy 11.3.7, regarding the circumstances where new physical hazard mitigation works are acceptable; and • Policy 11.3.8, to have particular regard to the effects of climate change which considering natural hazards.
Chapter 12 Landscape	The ORD Area does not contain any landscapes that are classified as outstanding natural landscapes or significant amenity landscapes. The area does comprise some areas which are locally elevated and more visible from a wider catchment, and relevant direction from the RPS has been considered. Objective 12.2.2 and Policy 12.3.3, regarding the identification and management of important landscapes that are not outstanding natural landscapes, are particularly relevant in this respect.
Chapter 13 Historic Heritage	Archaeological sites have been identified in lower parts of the ORD Area, and there is the potential for further sites to be discovered during future site works. Relevant direction in RPS Chapter 13 regarding historic heritage includes: • Objective 13.2.1, that historic heritage is identified and protected; • Objective 13.2.2, which recognises that cultural and heritage values are often expressed in a landscape setting and that provision should be made for the protection of such landscapes from inappropriate subdivision, use and development; • Policy 13.3.1, which sets out direction for the recognition and protection of historic heritage; • Policy 13.3.2, to recognise places of historic and cultural significance to Ngai Tahu and protect their relationship, culture and traditions with the places from adverse effects; and • Policy 13.3.3, to protect significant historic and cultural heritage landscapes from inappropriate subdivision, use and development.
Chapter 15 Soils	Parts of the ORD Area – both under the existing Plan and as proposed in the plan change – involve production activities and rural land use activities. The following provisions in the RPS are relevant in this regard: • Objective 15.2.1 and Policy 15.3.1, regarding the maintenance or improvement of soil quality; and • Objective 15.2.2 and Policy 15.3.2, regarding the prevention and reduction of soil erosion;
Chapter 16 Energy	Relevant direction in the Energy chapter of the RPS includes: • Objective 16.2.1, that development is located and designed to enabled efficient end use of energy, including through maintaining an urban form that shortens trip distances and avoiding impacts on the ability to operate energy infrastructure efficiently; and • Policy 16.3.1, which promotes the efficient end use of energy.

Chapter	Relevant provisions
Chapter 17 Contaminated Land	The proponent has commissioned a preliminary site investigation which has recommended a detailed site investigation to confirm the presence of any soil contamination in limited parts of the ORD Area which may be potential sources of soil contamination. The following provisions in the RPS are relevant in this regard: • Objective 17.2.1, that people and the environment are protected from effects of contaminated land; • Policy 17.3.1, to identify potentially contaminated land; • Policy 17.3.2, to require site investigations to determine the nature and extent of contamination associated with new subdivision, use and development – and to manage identified contaminated land such that it does not lead to further significant effects; and • Policy 17.3.3, to only allow identified contaminants to remain in contaminated land if discharges of the contaminants will not result in significant risk to human health or the environment.

2.5.2 Regional Plan

Consideration has also been given to the Canterbury Air Regional Plan, the Regional Coastal Environment Plan for the Canterbury Region and the Canterbury Land and Water Regional Plan.

While future use and development of the site will likely require various authorisations under one or more of these regional planning instruments, the plan change does not introduce any inconsistencies with the applicable policy direction or regulatory requirements therein.

2.6 Iwi Management Plan(s)

As referenced above, the plan change has taken account of *Te Poha o Tohu Raumati: Te Rūnanga o Kaikōura Environmental Management Plan 2007*. The express purpose of the management plan is set out in section 1.3 as follows:

This Environmental Management Plan is a written statement that consolidates Ngāti Kuri values, knowledge and perspectives on natural resource and environmental management issues. It is an expression of kaitiakitanga.

While the plan is first and foremost a planning document to assist Te Rūnanga o Kaikōura in carrying out kaitiaki roles and responsibilities, it also recognises the role of communities in achieving good environmental outcomes and healthy environments, and thus is designed to assist others in understanding tangata whenua values and policy.

The purpose of the plan is to:

(a) Describe the values underpinning the relationship between Ngāti Kuri and the natural environment;

(b) Identify the primary issues associated with natural resource and environmental management in the takiwā, from the perspective of Ngāti Kuri;

(c) Articulate Te Rūnanga o Kaikōura policies and management guidelines for natural resource and environmental management, consistent with Ngāti Kuri values;

(d) Provide continuity between the past (those that came before us), the present (our natural resource mahi today), and the future (those that will come after us).

Further, this plan provides a tool to:

(e) Enable Te Rūnanga o Kaikōura to effectively and proactively apply Ngāti Kuri values to the management of natural resources, wāhi tapu and wāhi taonga.

(f) Assist local, territorial and national authorities to understand Ngāti Kuri values and perspectives, and fulfil their statutory obligations under the Resource Management Act 1991, Conservation Act 1987 and other environmental legislation.

The management plan also makes clear that it is a living, working document and that the Runanga reserves the right to update or revise its contents. Similarly, the management plan records that:

All knowledge of Ngāti Kuri and Te Rūnanga o Kaikōura is the intellectual property of Ngāti Kuri and Te Rūnanga o Kaikōura. Te Rūnanga o Kaikōura reserves the right to use and make public parts of this knowledge, as deemed appropriate. Only certain kinds of information are included in this plan; additional customary knowledge is withheld, recognising that this is a public document. Use of the information in this plan by any party other than Te Rūnanga o Kaikōura does not infer comprehensive understanding of the knowledge, nor does it infer implicit support for activities or projects in which this knowledge is used.

Against this context, no conclusions are reached in this document regarding the Proposal's fit or otherwise with the management plan – nor does the summary of relevant provisions in **Table 7** below purport to comprehensively reflect all relevant values as they currently exist. The summary below is more to identify relevant management plan provisions at face value.

Table 7: Te Poha o Tohu Raumati provisions

Section	Relevant Provisions
Part 1: Introduction	The introduction to the management plan sets out various important contextual matters, culminating with a statement of Nga Hua: outcomes the Runanga wishes to achieve through development and implementation of the management plan. Those outcomes comprise 22 matters grouped in the following topic areas: • Kaitiakitanga and Treaty-related outcomes; • Environmental outcomes; and • Social, economic, health and well-being outcomes.
Part 2: Kaitiakitanga	Part 2 of the management plan sets out important historical context and relevant statutory considerations, along with an index of core values and principles, comprising: • Kaitiakitanga and the Future of our Children and the Environment; • Rangatiratanga and Independence; • Whakapapa and Tūrangawaewae; • Mana of the Tūpuna; and

Section	Relevant Provisions
Part 3: Ngā kaupapa	- Well-being of Ngāti Kuri. Part 3 of the management plan describes ngā take and ngā kaupapa associated with natural resource and environmental management in the takiwā of the Rūnanga. It is divided into 7 sections, of which three are understood to be most relevant to the substance of the plan change: 3.4 Te Ahi Kaikōura o Tama ki te Rangī; 3.6 Te Tai o Marokura; and 3.7 Wāhi tapu me te wāhi taonga Section 3.4 sets out issues and policies of relevance to the greater Kaikoura area. Relevant Kaupapa in section 3.4.1 relates to subdivision, and includes: - Policy 2, to encourage early consultation, prior to lodging resource consent applications for subdivision; - Policy 3, to assess subdivision applications in terms of the current subdividing activity, and in terms of future uses of the land, including associated building, stormwater, sewage, and water supply consent applications; - Policy 4, regarding cumulative effects; - Policy 5, to encourage subdivision that protects and enhances natural, ecological and cultural values; - Policy 6, to avoid adverse effects on the natural environment of increased demands on land, water and community infrastructure from new development; - Policy 7, regarding ‘ribbon’ development; - Policy 8, to develop landscape plans to protect integrity of waterways and wetlands where farm land is urbanised; - Policy 12, that subdivisions along significant waterways do not impede access to or along them; - Policies 15-18, regarding wastewater disposal and water storage for new subdivision; - Policies 19-23, regarding the management actual and potential discovery of archaeological sites, including the Rūnanga’s guidelines for Wāhi Tapu and Wāhi Taonga; Related Kaupapa in section 3.4.2 relates to buildings and land use, and includes:

Section	Relevant Provisions
	• Policies 5-9, regarding the sensitive management of earthworks and land disturbance activities; • Policy 10, to ensure built form does not detract from natural landscape and character values; • Policy 11, regarding wastewater and stormwater management systems; and • Policy 12, promoting buffer zones and covenants to ensure preservation of areas of indigenous vegetation and other culturally important features/places. The Kaupapa in section 3.4.3 relates to business growth, including the following: • Policy 1, to encourage appropriate growth and development that enhance natural and cultural values; • Policies 2, 5, 6, 7 and 8 regarding the protection and enhancement of natural and cultural landscape values from inappropriate business growth/development; • Policy 3, regarding use of the Rūnanga's guidelines for Wāhi Tapu and Wāhi Taonga; and • Policy 4, regarding wastewater disposal and stormwater management. Section 3.4.8 relates to wastewater disposal, including the following Kaupapa: • Policy 1, to adopt the highest environmental standards as relates to wastewater disposal; • Policies 2-4, regarding the preference for wastewater discharges to land over water, including through filtration, purification and use of treatment wetlands where appropriate; and • Policies 5&6, regarding good practice wastewater collection and disposal measures. The Kaupapa in section 3.4.11 relates to water quality, including: • Policy 1, to recognise and provide for the role of Ngāti Kuri as tangata whenua and kaitiaki in water quality management; • Policy 3, to avoid use of water as receiving environment for contaminant discharges; • Policy 5, to avoid compromising water quality due to abstraction; • Policy 7, to promote restoration of wetlands and riparian areas;

Section	Relevant Provisions
	• Policy 10, to maintain standards of water quality that ensure healthy mahinga kai populations; and • Policy 12, to maintain integrity and cultural uses associated with water by prohibiting unnatural mixing from different sources. Section 3.4.14 sets out Kaupapa for waterways, including: • Policy 1, to consider all waterways as wāhi taonga, and Policy 17 to consider ephemeral streams as waterways in all decisions; • Policies 2 & 3, to restore, maintain and protect the mauri of freshwater, taking into account the mana and unique values of each relevant waterway; • Policies 5 & 6, to adopt a catchment-wide management and precautionary approach to freshwater management; • Policy 7, to avoid water as receiving environment for direct or point source contaminant discharges; • Policy 8, to priorities the restoration of waterbodies with high cultural value; • Policy 11, regarding stock exclusion from waterways, wetlands and springs; and • Policy 8, to priorities the restoration of waterbodies with high cultural value; Cultural landscapes are the focus of Kaupapa under section 3.4.17, including: • Policy 1, to increase the ability of tangata whenua to participate in the management of cultural landscapes; • Policies 3 & 4, to protect important wāhi taonga and cultural landscapes from inappropriate subdivision, use and development and to promote their restoration and enhancement where appropriate; • Policy 10, to improve access to culturally important paces for Ngāti Kuri and Ngāi Tahu Whānui; and • Policies 11 & 12, to protect and enhance customary use traditions associated with important cultural landscapes, including indigenous biodiversity and mahinga kai. Section 3.6 of the management plan sets out issues and policies for the coastal environment and coastal marine area.

Section	Relevant Provisions
	Relevant Kaupapa for coastal land use and development in Section 3.6.1 includes: • Policy 1, to recognise and give effect to cultural, spiritual and historical association of Ngāti Kuri with the coastal environment; and • Policy 3, to avoid compromising the natural, cultural and ecological values of the coastal environment as result of inappropriate land use and development; • Policy 7, to consider specific natural and cultural landscape values and to protect significant cultural values in coastal areas; • Policy 8, regarding use of the Rūnanga's guidelines for Wāhi Tapu and Wāhi Taonga; • Policies 9 & 10, to protect, enhance and restore riparian margins in coastal areas, including through esplanades, covenants or similar mechanisms; • Policy 13, to support the use of indigenous species plantings to offset and mitigate effects of development in coastal areas; Section 3.6.2 includes similar Kaupapa to section 3.4.2 as summarised above, albeit in the context of the coastal environment. Section 3.6.5 relates to access, including the following Kaupapa: • Policies 1 & 2, for all Ngāi Tahu Whānui to have the capacity to access, use and protect coastal areas and associated values and to exercise customary rights associated with coastal and marine environments; and • Policy 3, to ensure coastal regions are sustained and protected in perpetuity. The focus of section 3.6.10 is coastal water quality and marine pollution, including the following Kaupapa: • Policy 1, to recognise and provide for the role of Ngāti Kuri as tangata whenua and kaitiaki of the coast and sea; • Policy 2, that the quality of coastal waters needs to be managed to protect its mauri; • Policy 6, to recognise and provide for coastal water health and its relationship with land use activities in upper catchments; • Policy 7, to protect coastal waterways and wetlands from impacts of unsustainable farming; and

Section	Relevant Provisions
	- Policy 8, to advocate for establishment and restoration of coastal wetlands and riparian areas. Section 3.7 addresses cultural heritage resources. The management objectives in section 3.7.1 include: 1) To protect all wāhi tapu and wāhi taonga in the takiwā of Te Rūnanga o Kaikōura. (2) To ensure that Ngāti Kuri are able to effectively exercise their role of kaitiaki over wāhi tapu and wāhi taonga in the takiwā. (3) To avoid compromising unidentified, or unknown, sites of cultural significance, as a consequence of ground disturbance associated with land use, subdivision and development. (4) To develop and maintain effective working relationships with those agencies involved in the protection of cultural and historic resources. (5) To develop and maintain effective working relationships with landowners and the wider community, with regards to the protection of, and access to, cultural and historic resources in the takiwā. Section 3.7.3 then sets out 19 guidelines that recognise and provide for the protection of wāhi tapu and wāhi taonga. Section 3.7.4.3 includes Kaupapa for District and Regional Councils, including: - Policy 1, that Ngāti Kuri expertise, knowledge and traditions regarding wāhi tapu and wāhi taonga are recognised, respected and provided for; and - Policy 2, to protect wāhi tapu and wāhi taonga in planning processes.

2.7 Relevant plans or strategies

The following plans / strategies are relevant to this topic:

- Walking and Cycling Strategy 2009;
- Long-term Plan 2024-2034; and
- Kaikoura Spatial Plan 2024.

Each of these documents is summarised in **Table 8** below.

Table 8: Council Strategies, Plans etc under other Acts

Plan / Strategy	Organisation	Relevant Provisions
<i>Walking and Cycling Strategy 2009</i>	Kaikōura District Council	The forward to this strategy notes that walking and cycling are about health, connecting communities, getting places, safety and environmentalism. The vision for the strategy is “Kaikoura – he hikoi eke pahikara pararaihi, ki uta ki tai. Kaikoura – a walking and cycling paradise, from mountains to the sea.” Three key objectives are included in the strategy to achieve this vision: • Objective 1: Encourage and support people in Kaikoura to choose walking and cycling for active, healthy lifestyles and an improved environment; • Objective 2: Develop a safe, accessible, sustainable and integrated network for walking and cycling; and • Objective 3: Ensure that all relevant strategies, policies, plans and practices for Kaikoura include and support walking and cycling. These aims are then supported by a range of policies, including the following of particular relevance to the plan change: • Policy 1.1: Encourage and actively promote walking and cycling for day-to-day, tourism and recreational trips. • Policy 2.1: Ensure the development of attractive and accessible links for pedestrians and cyclists based on identified desire lines, particularly in and around the town centre, schools and neighbourhoods, within the district as well as with surrounding districts; • Policy 2.2: Expand and enhance the facilities that support Kaikoura’s walking and cycling networks, including cycle parking, storage facilities, seating and signage, lighting, landscaping, water fountains and public toilets; • Policy 2.4: Ensure new roads and paths are compatible with the needs of pedestrians and cyclists of all ages and levels of ability; and • Policy 3.4: Ensure that new subdivisions provide convenient and attractive linkages between key destinations for pedestrians and cyclists through and between subdivisions.

Plan / Strategy	Organisation	Relevant Provisions
		The Strategy includes a Walking and Cycling Network Plan at Appendix E, which is inclusive of walking and cycling paths through the ORD Area – both on-road and dedicated off-road facilities. Descriptions of, and estimates for, various network upgrades are then set out in subsequent appendices, inclusive of features within and adjacent to the ORD Area.
Long Term Plan 2024-2034	Kaikōura District Council	The introduction to the Long-Term Plan (LTP) describes it as Council's most important planning document, guiding the Council's tasks over the next 10 years and confirming how it will pay for those works and services. The LTP notes that, prior to the 2016 Kaikōura earthquake, the Council had increased water supply and wastewater infrastructure to cope with a permanent population of 10,000 in the Township. The current population is just over 3,000 with estimated visitor numbers increasing this figure to 6,000 people. The LTP considers there is ample capacity in the three-waters services for the foreseeable future. Key issues that the Council has identified in the District for this LTP period include demographic change and desires for more affordable housing. Key feedback received from the public addressed a number of matters, including a desire for more community facilities. The LTP addressed the ORD Area at multiple junctures, including: • that a water main upgrade from the urban supply to the ORD Area is planned for the 2033 financial year, assumed to be funded by infrastructure acceleration fund and private funding mechanism. • that the District Plan is overdue for full review, but that progress has been achieved in working with the proponent to ensure the ORD Area zoning is appropriate to allow for growth; • that population is expected to grow 1.5% annually, with 300 new lots created over the next 10 years primarily at the ORD Area and Vicarage Views; and • that a shared pathway, widened road and extension of Ocean Ridge Drive will be delivered, funded by the Infrastructure Acceleration Fund.

Plan / Strategy	Organisation	Relevant Provisions
<i>Spatial Plan 2024</i>	Kaikōura District Council	The introduction to the KSP notes that it is a strategic guide to shape the future development of the town. It sets out where and how the district should grow over the next 30 years. The vision for the KSP is ‘Ki uta ki tai - From the mountains to the Sea: A diverse and welcoming intergenerational community with a strong whakapapa and thriving future that sustains nature on the raw edge from tall mountains to deep sea’. It identifies the following drivers of future change to be responding to by the KSP: 1. Lack of housing choice and affordability; 2. Highly productive land being subdivided; 3. Piecemeal development; 4. An ageing population; 5. Severance from freight; and 6. Tourism Growth. The KSP also defined a series of 5 spatial planning principles to steer future development: 1. Valued and interconnected landscapes are protected and enhanced; 2. Our heritage, local identity and small town character are respected and reflected; 3. Urban change is consolidated and optimised within and around our towns, settlements and papakainga; 4. Our community and economy are sustained, diversified and supported; and 5. Well-designed places that respond to context, are unified and provide for everyday needs. The main spatial plan identifies several key changes, accompanied by a map with defined spatial layers. At the ORD Area, the map notes “Ocean Ridge Development Area land uses, including a neighbourhood centre and residential densities, relative to the KSP to be determined through a plan change process.”

3 Evidence base & consultation

3.1 Evidence Base - Research, Information and Analysis undertaken

The Proponent has reviewed the operative District Plan, commissioned technical advice and assistance from various internal and external experts and utilised this, along with other information sources to assist with setting the plan change approach. This work has been used to inform the identification and assessment of the environmental, economic, social and cultural effects that are anticipated from the implementation of the provisions.

3.1.1 Technical advice commissioned by proponent

Technical advice commissioned by the proponent is indexed and summarised in **Table 9**.

Table 9: Evidence Base

Title	Author	Brief synopsis
<i>Preliminary site investigation – contamination (2025)</i>	Fraser Thomas Ltd	This report summarises the results of the PSI conducted under the NES-CS for those parts of the ORD Area where the plan change is proposing further subdivision and land use change – namely at The Hub, Greenlane, Farm and Crest Areas. In general, no potentially hazardous activities, as described in the current edition of MfE's <i>Hazardous Activities and Industries List</i> (HAIL), were observed across the majority of the proposed plan change area during the desktop study and site walkover. However, a number of localised potential HAIL activities, which may be potential sources of soil contamination, have been identified. In the author's opinion, under Regulation 5(7), the NES-CS does not apply to the majority of the plan change area, due to no obvious HAIL activities being identified. The NES-CS may however apply to the localised potential HAIL activities listed in the report. Accordingly, a Detailed Site Investigation (DSI), is recommended, which will be undertaken in support of any proposed future subdivision application in order to in order to confirm soil contamination, if any. Overall, the site is considered suitable to be rezoned for future residential development, provided the potential/actual localised contamination issues identified are appropriately investigated and managed through appropriate remediation or controls during site development as administered under the NES-CS. Refer Appendix 10.

Title	Author	Brief synopsis
<i>Ocean Ridge: Alternative Native Planting Restoration Management Plan (2025)</i>	Morphum Environmental	This report describes the review of existing restoration management plans for the ORD Area commissioned to accompany the plan change request and form the basis for future restoration planting efforts as progressive subdivision stages are delivered. The report: • Outlines the extent and ecological values of existing vegetation in the ORD Area • Proposes alternative restoration planting extents to achieve the best ecological outcome within the site constraints • Provides best practice site preparation, plant species, densities and grades to maximise the success of the plantings – again to be delivered via future subdivision stages; and • Provides comment of the maintenance, protection, and ownership of the restoration planting areas to ensure the long-term sustainability of the plantings. Refer Appendix 4.
<i>Ocean Ridge Private Plan Change: Ecological Impact Assessment</i>	Morphum Environmental	This report assesses the actual and potential effects anticipated by the changes enabled under the proposed plan change, including: • the increased residential yield within the ORD Area from 336 up to 486 units; • alter areas currently dedicated to open space/grazing to a combination of residential and large lot/lifestyle housing areas, • increase the total area dedicated to the Mixed-Use Area; and • amend the Native Planting Restoration Management Plan. The assessment below follows the Environmental Institute of Australia and New Zealand's Ecological Impact Assessment Guidelines (EclAG) (EIANZ, 2018). The EclAG utilises a standard framework and matrix approach providing a consistent and transparent assessment of effects. However, to future proof the assessment of current ecological values for future resource consent applications, the Environment Canterbury Regional Policy Statement Significance Criteria have also been utilised.

Title	Author	Brief synopsis
		The ecological values across the site have been assessed as ranging from Negligible to High. With Moderate ecological value being assigned to the riparian edge vegetation, coastal broadleaf vegetation, and wetland habitats. A High ecological value has been assigned to herpetofauna due to the low moderate possibility of Waiharakeke grass skink being present within the site. Effects of the alternative stormwater management approach required to manage the water quality and quantity effects of increased residential development, as well as the earthworks and streamworks anticipated by the plan change have also been assessed to demonstrate that ecological effects can be appropriately managed at the future resource consenting stage. The magnitude of effect has been assessed as Low or Negligible. After considering the magnitude of effect, the various ecological effects of the increased lot yield and alternative Native Restoration Planting Management Plan sought by the plan change results in no more than a Low level of effect. Therefore, further effects management is not considered necessary to address any ecological effects of the plan change. Furthermore, the assessment above demonstrates that future matters such as earthworks, streamworks, and stormwater discharges, can be appropriately managed at the time of resource consenting. Refer Appendix 5.
<i>Ocean Ridge Private Plan Change:</i> <i>Economic Impact Assessment (2025)</i>	Formative	This report assesses the economic effects of the proposed changes to the residential and mixed-use areas within the ORD Area, to inform the plan change request. The report finds that: the increase in residential capacity proposed will not noticeably change the role of Ocean Ridge within Kaikōura, and is appropriate from an economics perspective because it will provide increased housing choice for residents, encourage competition in the housing market, and do so in a way where the development costs are borne by the already approved IAF grant or the developer, such

Title	Author	Brief synopsis
		that there is no financial risk to the Kaikōura community, as the plan change will not require council funding; • there are a range of potential economic benefits of the plan change, such as stimulating new growth in the district by making Kaikōura attractive to new residents, and the larger population base will have some positive effects on supporting existing businesses, and potentially also on making new businesses viable, enabling the population to access a greater range of businesses locally; • it would be appropriate to enable 1,200m² gross floor area (GFA) of retail and food and beverages activities, and a further 400m² of office activities in the Ocean Ridge Hub Area to provide for the needs of the local population - while applying a maximum limit of 1,200+400m² for those activities will be appropriate to avoid negative economic effects, additional conditions such as related to maximum tenancy size might be considered to ensure a range of activities establish in the Hub Area, so that commercial activity there serves the community efficiently; • the proposed maximum limit of 1,200+400m² of retail and office GFA would not have adverse economic effects (including retail distribution effects) on other Kaikōura centres or business areas – rather the expanded Hub Area would be sustained by the local Ocean Ridge population, and would provide some capacity to accommodate a small number of businesses that have not to date found suitable accommodation elsewhere in the district; and • it would be appropriate for a limit of 3,200m² to be imposed on permitted community facilities, while visitor accommodation and residential activities need not be limited from an economic effects perspective. Refer Appendix 6.
<i>Geotechnical investigation report (2025)</i>	Fraser Thomas Ltd	This report presents the results of a geotechnical investigation and appraisal undertaken for the proposed plan change request. In general terms and within the limits of the investigation as outlined, except for identified slope

Title	Author	Brief synopsis
		stability issues, no unusual problems, from a geotechnical perspective, are anticipated with future residential and non-residential development in the Area. The report includes recommendations which will appropriately avoid, remedy or mitigate potential geotechnical hazards on the land subject to the plan change request, in accordance with the provisions of Section 106 of the Resource Management Act. The site is, in general, considered suitable for its intended use, with satisfactory conditions for future residential and non-residential development, subject to the recommendations and qualifications reported, and provided the design and inspection of foundations are carried out as would be done under normal circumstances in accordance with the requirements of the relevant New Zealand Standard Codes of Practice. Refer Appendix 9.
<i>Infrastructure assessment report</i>	Fraser Thomas Ltd	This report sets out the investigations undertaken, assessment of site servicing constraints and site servicing engineering requirements, undertaken for the proposed plan change request. It summarises existing service availability for three waters, telecommunication and electricity infrastructure, and identifies indicative development thresholds beyond which certain upgrades will be required. New wastewater pump station(s) will be required to accommodate the full scale of development anticipated by the plan change. Similarly, new water supply source and storage facilities will be required at some future stage. The timing and detail of these works will be determined at future subdivision stages. Outcomes of the assessment, conclude, in general, that a combination of existing infrastructure, and new infrastructure, will accommodate the proposed development, subject to further design. An addendum is attached to the report to clarify that this conclusion applies whether the existing dry stormwater basin at Kekenno Park is repurposed for mixed-use activities or not.

Title	Author	Brief synopsis
<i>Stormwater Modelling (2025)</i>	Fraser Thomas Ltd	Refer Appendix 7. This report describes the result of stormwater modelling undertaken to support the increased development potential enabled by the plan change. The model assessed existing pre-development conditions during 10-year and 100-year simulated storm events. It then assessed post development scenarios for these events, inclusive of assumptions for increased permeable surface area from roading and buildings. The model demonstrates that the post-development scenario can satisfactorily mitigate increased flows without resulting in downstream effects relative to the current scenario. It concludes: 1. The current stormwater system within the site performs satisfactorily during 10-year and 100-year events. Most of the flooding occurs in the existing gullies and stormwater detention areas, with minor flooding on the roads. However, due to downstream constraints, water backs up in the system and floods the area immediately north of the state highway. During a 100-year event, it is predicted that flooding will occur on the state highway. 2. The proposed stormwater mitigation reduces downstream flooding during 10-year and 100-year events. However, it does not remove flooding across the state highway. It appears impractical to completely remove flooding in SH1 due to the downstream level and backwater effect. 3. The depth of floodwater increases significantly in existing gullies where new embankments and detention basins are present. However, it does not have any adverse effects on the development. 4. If the design and recommendations outlined implemented, development can be adequately serviced regarding stormwater management, and the proposed mitigation measures will ensure that any adverse downstream effects are alleviated. The report notes also that that the stormwater mitigation strategy simulated for the Proposal is presented as a concept only to illustrate that feasible options are available to support the proposed plan change. The concept design is not prescriptive and does

Title	Author	Brief synopsis
		not preclude alternative solutions. Detailed design, including assessment of any viable alternatives, will be undertaken at the development stage. An addendum is attached to the report to clarify that an appropriate stormwater management system can be accommodated within the site whether the existing dry stormwater basin at Keken Park is repurposed for mixed-use activities or not. Refer Appendix 8.
<i>Visual effects assessment</i>	Novo Group	This report assesses the potential effects on landscape and visual amenity arising from the changes in development intensity enabled by the plan change. It recommends specific mitigation measures to ensure effects are sufficiently addressed in this regard. The recommendations and conclusion of the report are as follows: Recommendations 73. <i>Recommendations to address landscape and visual effects have been inherently built into the Plan Change. Guidance has been provided throughout the design inception, to ensure the conceptual masterplan is well considered and broadly reflected in the provisions of the ODP and Plan Change to form comprehensive outcomes with landscape and visual matters. The ODP plans were shaped by the extensive master planning exercise which included landscape and urban advice as outlined. Additionally, site-specific recommendations form part of the mitigation measures as outlined in Section 11 – 16 above, which include built controls, landscaping, height and design opportunities and outcomes.</i> Summary 74. <i>The Plan Change and ODP were developed through an extensive master planning process that identified key opportunities and constraints, guided by landscape and visual values (among other factors). The proposal aligns with relevant national, regional and district policies, objectives, and guidelines. Significant mitigation measures, including comprehensive design controls, have been incorporated to manage potential effects. As a result, the visual effects on surrounding parties</i>

Title	Author	Brief synopsis
		<i>are assessed as less than minor and can be acceptably absorbed into the receiving environment.</i> Refer Appendix 3.
<i>Ocean Ridge Masterplan (2025)</i>	Novo Group	The Masterplan is a strategic planning tool that has been used to inform other technical investigations, and the development of plan change provisions for the ORD Area. It is informed by an assessment of constraints and opportunities and considers the carrying capacity of the ORD Area to accommodate additional growth beyond that currently anticipated in the Plan. It sets out a vision for the future development of the site, accompanied by 6 underlying principles: • Provide a mix of residential accommodation reflecting the present and future needs of the community. • Provide for a reimagined “Mixed Use” Area which services the local community and complements the wider Township. • Provide all necessary supporting infrastructures, services and facilities. • Enable effective “connections” between Ocean Ridge and the greater Kaikōura township. • Provide Open Spaces for both active use and passive benefit to residents, the wider Kaikōura community and visitors. • Continue native vegetation and existing restoration initiatives and enhance public access. The masterplan includes studies of different housing typologies to be considered in future planning and development stages. It also sets out a design statement for the Hub Area, supported by spatial and visual simulation material. Refer Appendix 2.
<i>Ocean Ridge Drive Flood Mitigation Summary (2025)</i>	Pattle Delamore Partners	This memo summarises the key findings of related modelling carried out to support associated site works advanced under the Infrastructure Acceleration Fund, inclusive of flood mitigation works in the Kowhai River floodplain.

Title	Author	Brief synopsis
		The model results indicate that baseline flood hazards at the site are minimal and largely confined to existing wetlands and topographic depressions. However, given the geomorphological complexity of the Kowhai River and the site's sensitivity to riverbed aggradation, multiple sensitivity scenarios were assessed to provide an envelope of on-site baseline flood effects. The most conservative of these scenarios (i.e., the scenario that resulted in the largest on-site pre-development flood hazard) was then selected as the design scenario. This incorporated: • 2 m of riverbed aggradation for the 500-year event; • The complete removal of the true-left stopbank embankment, for the entire duration of the event (240 m long and 70 m wide); • A 1.5 m increase in sea level at the downstream boundary, coupled with a spring tide, the peak of which coincides with the peak of the flood event; • An increase in peak flow of 30 % to account for climate change, and; • No river breakout upstream of the development. The report summarises the proposed design standard for Ocean Ridge, which responds to the pre-development flood hazard by establishing raised building platforms such that finished floor levels are at least 300 mm above the 500-year ARI flood level under a conservative design scenario. The memo considers this mitigation strategy aligns with Policies NH-P9, NH-P10, and NH-P12 in the Plan by demonstrating: • Finished floor levels are more than 300 mm above the 500-year design flood level, mitigating flood risk to people and property (NH-P10 and NH-P12); • No significant increase in risk to surrounding properties (NH-P10); • No requirement for new or upgraded community-scale mitigation works (NH-P10); and • Earthworks are unlikely to cause significant off-site displacement of floodwaters and associated hazard relative to the pre-development scenario (NH-P9). A contour map is attached to the memo outlining the necessary finished floor levels across The Farm area, which vary spatially in response to flood risk. The

Title	Author	Brief synopsis
		contours define minimum finished floor levels based on the 500-year design flood level plus 300 mm freeboard where flooding occurs, or existing ground level where no inundation is predicted. These contours are intended to support the development of permitted activity rules for new sensitive activities, provided they meet the specified minimum floor level requirements. Refer Appendix 12.
<i>Integrated Transportation Assessment (2025)</i>	Novo Group	This report assesses the increased development potential enabled by the proposed plan change and the associated effects that increased development will have on the safe, efficient function of the transport network. This assessment concludes: • the design and layout of the ODP is well integrated into the existing and proposed transport network and is appropriate to safely and efficiently provide for access to the planned residential areas and the Hub; • the ODP layout is integrated with and supports planned walking and cycling connections between Ocean Ridge and the Kaikoura Township as well as recreational routes. The ODP also provides a number of trails (off-road) which improve the internal connectivity including between residential areas and to the Hub; • the existing intersection of Ocean Ridge Boulevard with SH1 can accommodate the anticipated increase in traffic volumes safely and efficiently; • the new left turn egress to SH1 from the Hub area will provide an efficient route for trips between the Hub and the Kaikoura Township and the location proposed is appropriate to facilitate the safe and efficient access to SH1 for a stop-controlled left turn egress; • the changes to the extension of Ocean Ridge Drive are appropriate to align with the planned Rail Overbridge to Green Lane and the future shared path connection along Ludstone Road; • the Proposal is also considered to be generally consistent with and supports the relevant objectives and policies of the District Plan, from a transport perspective; and

Title	Author	Brief synopsis
		overall, the Proposal can be supported from a transport perspective noting that the ODP design and layout is appropriate and there is ample capacity to safely and efficiently integrate the anticipated development into the existing and planned transport network. Refer Appendix 11.

3.1.2 Advice received from Te Rūnanga o Kaikōura

To date, information exchanges between the proponent and Te Rūnanga o Kaikōura has been via a series of hui, in February, March and September 2025. No cultural impact assessment, cultural values assessment or other formal written record of relevant cultural values have been undertaken in relation to the Plan Change.

Table 10 includes a summary of the discussions held between the parties to date. Copies of meeting minutes have been provided to Runanga representatives after each hui. The summaries below have not been verified by Runanga as representative of the discussions but are the proponent's best attempt to faithfully capture the breadth of matters canvassed.

Table 10: Summary of meetings with Te Runanga o Kaikoura representatives

Details	Summary of discussion
3 February 2025 Attendees: Clint McConchie (Te Rūnanga o Kaikōura); William Loppe (KPMO); Malcolm Smith (MS Consulting); Jason Jones (Resource Management Group)	- This meeting was to initiate discussions between the parties on the plan change - The proponent's representatives provided an overview of the site planning history, the plan change purpose, aspirations and key changes, including: - Ocean Ridge is currently a residential area conceived in 2005, originally to provide for 280 dwellings and a small Mixed-Use Area (MUA) combining residential and non-residential activities to support local residents (hospitality & visitor accommodation); - circa 2010, District Plan provisions relating to Ocean Ridge were updated to increase residential offering by 56 dwellings and provide a modest increase to MUA; - approximately 50% of the currently planned development has been subdivided and/or built upon; - original vision for Ocean Ridge was a residential settlement to be sensitively nestled in amongst areas to be replanted in indigenous vegetation; - current thinking is to seek another plan change in 2025 which may entail a further increase in anticipated residential yield by ~150 households plus a further MUA expansion to accommodate additional houses & supporting non-residential activity – overall, this would see the theoretical yield increase from 280 (in 2005) to 336 (in 2010) to 486 (or thereabouts);

Details	Summary of discussion
	– there is no plan to expand the footprint of the Site or the Ocean Ridge Development Area – rather, the additional yield will be realised by intensifying anticipated residential use in the Green Lane area, introducing residential activity in the western part of the site adjacent to the Golf Course ('the Farm'), and through the expanded MUA; – at Green Lane the District Plan currently anticipated 500-600m² sections, but the plan change will seek to enable smaller site sizes and a more diverse mix of housing typologies; – at the Farm residential activity will be enabled in an area currently dedicated to 'open space / grazing' in the District Plan; – existing subdivided areas will retain the status quo; – various development options are being considered before finalising for the plan change and the preferred option needs to be informed by technical, cultural and other advice; and – the overall vision is to provide for greater housing choice to appeal to a wider demographic, noting the lack of medium-high density offerings in the township currently. • The parties noted that the previous plan changes were informed by Rūnanga assessments of relevant values. • The parties discussed the merits of Kaikoura being an attractive place to work and live, and the desire expressed by Council and others to see more affordable and more diverse housing options. • The parties discussed the parallel project to deliver an extension of Ocean Ridge Drive through to Green Lane by way of new rail overbridge. • The proponent's representatives noted that the aim for the expanded MUA would be to primarily meet local needs without impacting on the function of existing centres. • The proponent representatives also noted that over half of the intended restoration planting has occurred on site to date; however, there are challenges to long-term ownership that are prompting the proponent to refine anticipated arrangements under the Plan. • The importance of water quality for Rūnanga was noted, including the potential interaction between groundwater and surface water. • Next steps agreed were for the proponent to present to the Rūnanga floor following the March Hui. Direction was to be sought at the March Hui as to future scheduling.
27 March 2025 Attendees: Clint McConchie (Te Rūnanga o Kaikōura); William Loppe (KPMO); Malcolm Smith (MS Consulting); Jason	• This second meeting was to advance discussions between the parties on the plan change following the initial February meeting. • The proponent's representatives noted the commissioning of an independent ecological impact assessment and altered restoration management approach. • The proponent's representatives noted that preliminary thinking was that there would be a greater emphasis on riparian and wetland planting relative to the existing mix, but a slight reduction overall in the planned quantum to

Details	Summary of discussion
Jones (Resource Management Group)	be planted (in hectares) – it was clarified that the plan change would not be proposing the removal or destruction of any restoration or amenity planting established to date. • It was noted that time did not allow for the preferred approach for future dialogue between the parties to be considered at the Runanga’s regular March Hui – another attempt would be made at the April hui. • The parties also discussed the previous cultural impact assessments prepared in previous planning processes and whether the Rūnanga currently prefers a particular format for accidental discovery protocols. • The parties discuss whether a cultural impact assessment would be an appropriate vehicle to understand cultural values and potential impacts of the plan change – and while that option was not ruled out, face-to-face discussions were the preferred approach for the Runanga until further notice; • It was agreed that the parties would aim to have a brief meeting following the Runanga’s April Hui to discuss format and timing for further engagement.
1 September 2025 Attendees: Members of the Rūnanga executive; Jason Jones (Resource Management Group)	• The proponent was invited to attend a normal meeting of the Runanga Executive. • The proponent’s representative spoke to a series of slides, which provided an overview of the recent planning history at Ocean Ridge, the drivers for further change to the District Plan, and the key changes being proposed in the plan change. • Questions were asked by various members of the executive, with key areas of interest being: – ownership and maintenance of restoration areas, and whether there is opportunity for the Rūnanga to have a direct role – the proponent’s representative gave an undertaking to raise with the proponent, and to report back following those discussions; – climate change, sea level rise and hazards – the proponent’s representative explained the design standard for future stormwater management areas (100-year event plus allowance for climate change impacts), for Kowhai River flood breakout mitigation (500-year event plus multiple assumptions about climate change, worst-case stopbank failure, reduced carrying capacity of the channel and tidal influence) and the results of discussions with ECan hazard advisors on tsunami modelling (being that the lower parts of the site are more likely to fall within the area to be managed by civil defence response, rather than land use planning controls); and – three waters servicing, and community infrastructure – it was noted that the plan change will identify specific three waters upgrades and that greater allowance for community infrastructure is provided for in the two additional parks proposed and more enabling rules for the expanded mixed-use area by State Highway 1.

Details	Summary of discussion
	- Members of the executive noted the relative importance of the lower lying parts of the site closer to the sea and the Kowhai River, noting the proximity of pā and kāinga historically in the vicinity and the likely use of the area for mahinga kai and access between the foreshore and the river. - The potential processes for future dialogue and timing were also discussed, but no formal commitments were made by either party.

3.1.3 Consultation undertaken to date

The following is a summary of the consultation undertaken on the Proposal to date:

Table 11: Consultation summary

Who	What	When	Relevant Issues Raised
Kaikōura District Council – Elected members	A. Introduction to reserve exchange proposal B. Overview of plan change proposal	A. 19 February 2025 B. 12 March 2025	A. Overview of two reserve exchange options and related plan change components. Included discussion of public engagement processes under RMA and Reserves Act. A site visit was subsequently arranged for elected members to view options proposed. B. Workshop included presentation and Q&A with elected members. Overview of plan change drivers and preliminary findings of technical investigations presented.
Kaikōura District Council – Officers & Consultant Advisors	A-D. General meetings to discuss process and substantive matters leading to plan change lodgement. E. Workshops with consultant planner to discuss technical reports and associated plan provisions	A. 28 January 2025 B. 25 February 2025 C. 25 May 2025 D. 25 July 2025 E. 4 x sessions between May and August 2025	A. Discussed preliminary approach to restoration planting, mixed use area, reserve exchange, engagement, processing and decision-making, and arrangement of elected member workshops. B. Update provided on investigations regarding flood hazard management, ODP development, Wetland identification, transportation

Who	What	When	Relevant Issues Raised
			effects and economic effects. Update also provided on engagement to date. C. Update provided on activity mix and limits at the Hub, reported on NZTA engagement and transport modelling, and provided updates also on hazard assessments and ecology/restoration matters. D. Update provided on engagement, servicing investigations, post-lodgement process and sequence, reserve exchange details. E. Informal workshops over Microsoft Teams preceded by staged pre-circulation of draft technical reports and associated provisions to be applied in plan change.
Environment Canterbury Officers	– Meetings to discuss hazard mitigation and general matters relevant to the RPS.	A. 5 February 2025 B. 18 February 2025	A. Provided overview of key changes proposed in plan change, discussed flood modelling results and residual risk, discussed stormwater management approach and need for further detail on water supply and wastewater disposal. B. Follow-up discussion on fluvial flood modelling and consideration of relevant policy context – this was followed up by subsequent correspondence between the parties via email.
NZTA	Meetings to discuss results of transportation modelling including proposed limits on residential and non-	A. 30 August 2024 B. 17 April 2025 C. 2 May 2025	A. Provided overview of key changes proposed in plan change, discussed flood new rail overbridge at Greenlane.

Who	What	When	Relevant Issues Raised
	residential activities, and additional egress from Hub Area.		B. Provided detailed overview of Proposal, and presented preliminary results of transport modelling and stormwater modelling, Requested detail from NZTA re: noise attenuation requirements C. Detailed discussion of modelling results and relevant proposed plan change provisions with network and safety engineers.
KiwiRail	Meeting to discuss development proposal operational requirements for KiwiRail	27 January 2025	Brief overview of Proposal provided inclusive of new road alignment and additional housing in Greenlane. Discussed KiwiRail's requirements for minimum building setbacks and mechanical ventilation, though no specific model provisions provided by KiwiRail.
Landowners	Direct engagement via emails, phone calls, face-to-face meetings inclusive of providing summary documentation about the Proposal where interested.	Mid 2024 through July 2025	Owners of land in the Hub Area, Area D, and neighbouring sites surrounding the periphery of the ORD Area were engaged with at multiple junctures through a variety of formats. Summary documentation about the plan change was provided to landowners upon request.

The proponent has taken account of the feedback provided by the parties summarised in Table 11, including:

- preferred design scenario for flood mitigation;
- acoustic standards to mitigate noise from strategic infrastructure received by potentially noise-sensitive activities;
- details to consider for potential reserve exchange proposal;
- additional assessments undertaken by technical advisors following review of draft materials; and

- specific policies, rules and methods to address issues raised, including the avoidance, remediation or mitigation of various land use and subdivision activities.

4 Assessment of environmental effects

Where environmental effects are anticipated from proposed changes to the Plan, the plan change request is to describe those effects in such detail as corresponds with the scale and significance of actual or potential effects from implementation of the plan change. Given the findings below that the overall scale and significance of anticipated effects is low, a high-level assessment is considered to be appropriate.

This assessment has been informed by the statutory and policy direction summarised in section 2 and the evidence base summarised in section 3 above.

Relevant effects that have been identified are discussed in turn below and include:

- cultural effects;
- housing supply and choice;
- ecology & biodiversity effects;
- landscape, built form and visual amenity effects;
- economic effects;
- effects on the transport network;
- stormwater management;
- other servicing;
- fluvial flooding effects;
- other natural hazard effects;
- contaminated land;
- community infrastructure.

4.1 Cultural effects

No written/formal advice has been received from Te Rūnanga o Kaikōura to date as to the full scope of relevant cultural values or the Proposal's potential impact on those values; and accordingly, no conclusions are reached here as to cultural effects.

The Proposal has been informed by *Te Poha o Tohu Raumati: Te Rūnanga o Kaikōura Environmental Management Plan 2007*, and by discussions with representatives of Te Rūnanga o Kaikōura as summarised previously.

In preparing the plan change request and considering effects that *might* be relevant based on the above sources, the proponent has proposed provisions to avoid, remedy or mitigate adverse effects including:

- issues, policies, rules and methods to increase housing choice relative to the existing offering in Kaikōura, inclusive of more affordable, higher-density options;
- retention of existing, and inclusion of new, issues, policies, rules and methods to manage effects on landscape and visual amenity values;
- new issues, policies and methods to ensure environmental stewardship of restoration planting areas is sustainable and effective;

- formal mapping of natural inland wetlands and stream extents in the ORD Area, and inclusion of new issue, and amended policies, rules and methods to maintain and enhance these natural features;
- policies and methods to increase local community infrastructure in the Hub and new local reserves in the Farm and Greenlane areas;
- rules identifying the need to establish new three-waters infrastructure, including:
 - additional water supply source and storage;
 - new wastewater pump stations and connections to existing network; and
 - stormwater management facilities, designed to result in no net increase in stormwater flows from the site during a 100-year storm event and to apply a treatment train approach to ensure water quality is maintained or enhanced; and
- rules and methods to maintain and enhance access to and along the Coast and the Kowhai River.

As noted above, the proponent is continuing discussions with the Rūnanga presently and has signalled its desire to continue discussions during the post-lodgement sequence.

4.2 Housing supply and choice

Kaikōura faces a limited range of housing options, mainly due to the size of existing urban residential lots. The KSP notes that at the end of 2024, 94% of these lots exceed 500m², creating a landscape dominated by bigger properties. In contrast, 5% of lots are smaller than 500m², and 1% are less than 250m². The District accordingly lacks sufficient housing choice to support changing housing needs, especially for younger and older individuals seeking compact living spaces.

The plan change responds to this in two main ways.

Firstly, it enables smaller lot sizes in the Greenlane (350m² minimum) and Hub Areas (no minimum). This will provide for smaller, standalone housing typologies on smaller blocks, which will – all other things being equal – provide more affordable options and lower maintenance opportunities relative to the larger suburban blocks common in the district.

Secondly, the Proposal enables multi-unit housing in the Greenlane, Farm and Hub Areas, subject to a design-led consenting process. Future multi-unit developments will be assessed on a case-by-case basis and will be provided for where they:

- are of an intensity, scale and design consistent with the amenity values of the ORD Area;
- contribute positively to the public realm; and
- provide sufficient outdoor living space and on-site domestic storage for waste/recycling etc.

Retirement villages, inclusive of higher density living arrangements and supporting services, are similarly provided for, albeit in the Greenlane and Farm Areas only.

The Proposal also increases the supply of housing by 150 dwellings relative to the current Plan settings.

Overall, the Proposal is anticipated to have net positive effects on housing supply and choice with any associated adverse effects appropriately avoided, remedied or mitigated by the proposed provisions.

4.3 Ecology & biodiversity

Since the Ocean Ridge Comprehensive Living Zone was established in 2005, ecological values and biodiversity on the site have been enhanced through the establishment of 27ha of native plants in wetland, riparian and dryland areas. The plan change proposes the continuity of restoration efforts through all future subdivision stages, with the establishment of nearly 20ha of additional planting to be delivered by the time the ORD Area is fully developed.

The alternative restoration management plan prepared by Morphem Environmental includes modifications to the previous version of the management plan, which was last updated in 2010 (refer **Appendix 4**). While no existing planting is proposed to be removed as a result of the plan change, there are some areas previously identified for restoration purposes which are now proposed to be Country Living, lifestyle or suburban housing. Other areas previously identified for housing now are anticipated to be planted. Overall, the quantum of restoration planting is anticipated to be reduced by:

- around 8ha if the spatial layers on the existing restoration plan are used as a benchmark; or
- around 2ha if the ratio required by SUB-S11 is relied upon.

In the latter case, SUB-S11 requires 1ha of restoration planting per 7.5 residential allotments created, yielding a total area dedicated to restoration planting of 44.8ha. As recorded in the revised plan prepared by Morphem, the new minimum area of dedicated restoration planting is 42.7ha. While this may amount to a very low opportunity cost in s32 RMA terms – as discussed further in Part B below – it is not considered to be an adverse effect as no restoration vegetation which has been established is proposed to be removed by the plan change.

The Proposal's impact on ecological values has been assessed by Morphem Environmental as summarised in **Table 9** above and provided in **Appendix 5**. That assessment concludes that the overall magnitude of effects on ecology and biodiversity has been assessed as Low or Negligible. Furthermore, the assessment finds that future earthworks, stream works, and stormwater discharges, can be appropriately managed through future consent processes under relevant national, regional and district planning instruments.

The alternative restoration management plan prepared by Morphem will also provide the benchmark against which all future subdivision applications in the ORD Area will be assessed for restoration purposes. The expectation established in the proposed policies, rules and methods is that subdivisions will either deliver the outcomes anticipated using the methods detailed in the management plan or otherwise demonstrate how similar or better outcomes will be achieved.

Overall, the proposed plan change is anticipated to result in a comparable environmental outcome relative to the status quo, with ecological and biodiversity values enhanced through ongoing restoration planting, and any actual or potential adverse effects able to be appropriately avoided, remedied or mitigated through the application of rules and/or consent-based approval processes.

4.4 Landscape, built form and visual amenity

The plan change has been informed by the Concept Masterplan attached at **Appendix 2**. The Masterplan has established the vision for the future development of the ORD Area and has informed the various technical reports summarised in **Table 9** above.

Where appropriate, key design matters in the Masterplan have been adapted to proposed plan change provisions. That said, the purpose of, and context for, the Masterplan is intentionally broader than the plan change to inform other development decisions outside the District Plan.

The visual effects assessment conducted by Novo Group at **Appendix 3** has also informed the proposed plan change provisions. The report recommends various mitigation measures to ensure built form effects are appropriately avoided, remedied or mitigated. It concludes that, with the application of the proposed provisions, effects on visual amenity will be less than minor.

The existing Plan provisions relating to this topic are extensive and catered to the variable landscape character of the site. In general, elevated, more prominent parts of the site are subject to more prescriptive built form controls and landscaping requirements.

For the Foundation Areas defined on the ODP, the plan change does not propose any material change in this respect. For the undeveloped areas of the site, the operative approach is maintained whereby built form controls applying to each Sub-Area are catered to the local site context. By way of example:

- the more prominent ‘knoll’ in the Greenlane Area is now subject to controls on roof profiles, continuous building length and requirements for adjacent restoration planting to be established in advance of building activities;
- controls on the reflectivity of exterior walls and roofs of buildings in the Farm Area are applied; and
- integration planting is retained as a method in the Greenlane Area and added to the Hub Area adjacent to State Highway 1.

These measures have been adopted to ensure future built form is of a nature and scale that supports the landscape character and visual amenity values of the area. While certain parts of the Sub-Areas will provide for more intensive housing typologies than the Foundation Areas, it is envisaged that the character delivered in each of the Sub-Areas overall will maintain the common ‘language’ of the ODR Area defined by existing development and Plan settings.

Allowance has been made for taller buildings in the Hub Area, with 11m being the general height limit across the area. Greater height is provided for up to 15m in the northwestern corner of the Hub Area, under the toe of the main ridge below Ingles Drive. These limits are accompanied by generous front and rear setbacks, ground floor footprint limits, and structural elements on the ODP requiring ‘green’ linkages through the built form at the Hub. Overall, the provisions will enable built form outcomes that are enabling of a vibrant mixed-use precinct, whilst also remaining of a scale that can be absorbed within the landscape.

4.5 Economic effects

The economic assessment from Formative is provided in **Appendix 6** and summarised in **Table 9**. The report considers potential impacts of the increased residential yield sought by the plan change as well as the increased quantum of non-residential activity enabled in the Hub Area.

Regarding the increased residential yield, Formative reaches the following conclusions:

Because there are no issues with infrastructure servicing, highly productive land, or [Well-functioning urban environments], from an economics perspective it is our opinion that there are no negative effects of enabling additional residential capacity within Ocean Ridge, and there will be a number of positive effects, including improving housing supply, choice and affordability. That means there are no economic costs, some economic benefits, and overall net economic benefits to the community of the residential component of the plan change.

Turning to the Hub Area, the economic assessment notes that the intent for the area is to function as a relatively tightly defined group of activities that are primarily focused on supporting the local population in the ORD Area. The future activities can be used by allcomers, but care has been taken to ensure the nature and scale of activity remains sympathetic to the primacy of the existing commercial area and the recently established Light Industrial Zone.

Formative considers this local focus at the Hub is entirely appropriate, and has recommended specific limits on different activities to ensure that sympathy is achieved with existing commercial areas. Those activities include offices, retail including food and beverage activities, educational facilities, recreational and other community facilities.

The recommended limits have in turn been adopted in new permitted activity controls within the Ocean Ridge chapter. Where relevant limits are exceeded by future proposals, sufficient discretions will be available to Council to consider potential effects on the function and vitality of existing centres, and to either impose conditions or decline proposals where anticipated effects are inappropriate in nature or scale.

As concluded by Formative, the proposed plan change has no economic costs for the Council or community but will generate a range of positive economic effects that will benefit Kaikōura. The plan change is accordingly appropriate and positive from an economics perspective

4.6 Effects on the transport network

The integrated transportation assessment completed by Novo Group is summarised in **Table 9** and attached at **Appendix 11**.

The assessment considers the existing transport network and potential effects on the transport network arising from the proposed changes to the Plan. It presents the results of modelled changes in traffic generation from the increased residential yield and non-residential activity proposed by the Plan Change, and separately considers:

- the design and layout of the ODP;
- Ocean Ridge Drive extension;
- new connection to Green Lane / Ludstone Road;
- the performance of the Ocean Ridge Boulevard / State Highway 1 intersection; and
- the proposed new left turn egress from the Hub Area towards Kaikōura Township.

Overall, the integrated transport assessment concludes that:

- the design and layout of the ODP is well integrated into the existing and proposed transport network and is appropriate to safely and efficiently provide for access to the planned residential areas and the Hub;
- the ODP layout is integrated with and supports planned walking and cycling connections between Ocean Ridge and the Kaikoura Township as well as recreational routes;
- the ODP also provides a number of trails (off-road) which improve the internal connectivity including between residential areas and to the Hub;
- the existing intersection of Ocean Ridge Boulevard with SH1 can accommodate the anticipated increase in traffic volumes safely and efficiently;

- the new left turn egress to SH1 from the Hub area will provide an efficient route for trips between the Hub and the Kaikoura Township – the location proposed is appropriate to facilitate the safe and efficient access to SH1 for a stop-controlled left turn egress;
- the changes to the extension of Ocean Ridge Drive are appropriate to align with the planned Rail Overbridge to Green Lane and the future shared path connection along Ludstone Road;
- the Proposal is considered to be generally consistent with and supports the relevant objectives and policies of the District Plan, from a transport perspective; and
- the Proposal can be supported from a transport perspective noting that the ODP design and layout is appropriate and there is ample capacity to safely and efficiently integrate the anticipated development into the existing and planned transport network.

Like the economics assessment, the transportation assessment relies upon certain limits being applied to various activities enabled at the Hub Area in combination with the 150 additional dwellings enabled across the ORD Area. Those limits again are codified in the proposed rules and standards in the Ocean Ridge Chapter, and sufficient discretions are included where future proposals exceed those limits to ensure effects on the safe, efficient function of the transport network.

Relevantly, the proponent has engaged with NZTA and KiwiRail on the plan change provisions. From the discussions held with NZTA, the proponent understands that there are no material concerns arising as regards the Proposal's impact on the safe, efficient function of the State Highway. In addition to the activity limits proposed in the residential areas and Hub Area, the proponent has also proposed rules to manage the potential for reverse sensitivity effects to arise from the establishment of new noise-sensitive activities at the Hub. Model provisions provided by NZTA have been used as a basis for these new rules.

Similarly, in response to the meeting held with KiwiRail representatives in January of 2025, a comparable rule is proposed to manage noise received from rail activities by future noise-sensitive activities near the Main North Line. While no specific model provisions were provided by KiwiRail, the proponent has adopted controls applied recently in relation to the Vicarage Views subdivision.

Overall, the Proposal is anticipated to appropriately manage potential effects on the safe, efficient function of the transport network.

4.7 Stormwater management

The stormwater modelling report from Fraser Thoms is attached at **Appendix 8** and summarised in **Table 9**.

The modelling report assesses pre- and post-plan change stormwater flows during simulated 10- and 100-year storm events. It is principally a water quantity assessment tool.

The model utilises the concept masterplan as an indicative scenario for the level of development enabled by the plan change, and applies appropriate assumptions about various model inputs including the amount of impermeable surfacing introduced, rainfall volumes, infiltration rates, flow rates, climate change effects and other relevant factors.

The model also assumes various stormwater management facilities will be introduced to ensure post-plan change peak flows do not exceed pre-plan change flows during the design events. These facilities are indicative and applied primarily to demonstrate proof-of-concept that the level of increased development can be effectively and feasibly serviced for necessary stormwater infrastructure. The

report concludes that the modelled scenario, inclusive of the indicative concept design, would reduce downstream flooding during the design events.

There may be other solutions that can provide a similar or better level of service, and those would be subject to scrutiny in future subdivision design and associated consenting processes under relevant national, regional and district planning instruments.

In terms of stormwater quality, the plan change provisions include the expectation under the ODP that a treatment train approach will be applied to ensure water quality in wetlands and waterways is maintained or enhanced. As discussed in the Infrastructure Report at **Appendix 7**, treatment facilities will be determined in future subdivision stages (and associated consent processes administered by ECan), and might include some or all of:

- trapped sumps in roading;
- roadside swales;
- proprietary treatment devices;
- ‘first flush’ basins;
- constructed treatment wetlands;
- rain gardens;
- attenuation basins; and
- energy dissipation devices to reduce erosion and scour.

Together, the stormwater modelling and infrastructure assessment report indicate that the increased development enabled by the plan change can be effectively and feasibly serviced with stormwater management infrastructure capable of delivering desired water quality and quantity outcomes.

4.8 Other servicing

Servicing matters have been addressed by Fraser Thomas in the Infrastructure Assessment Report at **Appendix 7** as summarised in **Table 9**.

The infrastructure assessment draws on the stormwater modelling report, geotechnical assessment report and the fluvial flood assessment from PdP. It uses the concept masterplan as a scenario to assess feasibility of servicing the additional residential and non-residential activity enabled by the plan change, inclusive simulated earthworks designs, roading layouts, allotment distribution and other assumed parameters.

It also identifies increased demands for additional wastewater, water supply, telecommunications and electricity servicing associated with the increased residential yield and non-residential activity at the Hub and identifies potential upgrades that are feasible to ensure all new development in the ORD Area is sufficiently serviced. Those upgrades have been identified in the ODP and include:

- a new water supply source;
- new water storage; and
- new wastewater pump station(s) and connections to the reticulated network.

The timing and details of these upgrades will be determined at future subdivision stages and can be readily delivered through the corresponding matters of control and discretion in the relevant subdivision rules.

Communications from Mainpower confirm that capacity can be made available on the High Voltage network to supply the full development, though additional infrastructure may ultimately be required

to facilitate supply. Similar confirmation is provided by Chorus in relation to telecommunication connectivity.

The infrastructure report concludes that, in general, a combination of existing infrastructure, and new infrastructure, will accommodate the proposed development, subject to further design. Further site investigation and consultation with Council, and other service providers, would be undertaken during proposed future site development and design stages, to confirm specific civil design and servicing requirements.

The report demonstrates that there are feasible options available to accommodate the additional services demand created by the increased household and non-residential growth enabled by the plan change. Any adverse effects from service connection and provisions can be readily managed through subdivision and associated consenting processes under the relevant national, regional and district planning instruments.

4.9 Fluvial flood effects

4.9.1 Flood modelling

As part of the parallel Infrastructure Acceleration Fund project in the ORD Area, pdp was commissioned to model potential breakout events of the Kowhai River and to assess associated flood risk. The assessment process is summarised in the memo from pdp attached at **Appendix 12**.

The starting point for the pdp model was the existing model commissioned by ECan in 2017 along with an increase in effects magnitude to account for climate change impacts (30% higher). Incidentally, this existing model currently informs the identification of ‘High Hazard Areas’ and the determination of ‘Flood Hazard Assessment Certificates’ as administered under the Natural Hazards chapter of the operative Plan. These terms are discussed in more detail shortly.

Under existing conditions, inclusive of the bed level of the Kowhai River and the expectation that the existing stopbanks will function as designed, the pdp model indicates that *baseline* flood hazards during the simulated 200- and 500-year flood event are minimal and largely confined to existing wetland areas and topographical depressions in the ORD Area. At face value, this would suggest that the portion of the ORD Area that might be classified as ‘High Hazard’ from flood breakout events is relatively confined.

However, the Kowhai River is understood to have relatively high morphological complexity, inclusive of potential bed aggradation over time should gravel reserves in the upper catchment be released. In this respect, the key matter for the plan change to address is the *residual risk* from stopbank failure and/or potential changes in morphological or other environmental factors that might alter flood carrying capacity or behaviour in the Kowhai River catchment.

To account for this complexity and associated uncertainty in the river’s capacity to carry flood flows, pdp modelled more than 40 scenarios applying various combinations of assumptions that might lead to increased flood vulnerability in the ORD Area. The scenarios were socialised with Environment Canterbury river management staff and found to be reasonably comprehensive.

The most conservative model scenario, which has been adopted as the design scenario for the Proposal, includes the following assumptions over and above the existing ECan model:

- 2m of riverbed aggradation for the 500-year event;
- complete failure/removal of the true-left stopbank in the worst-case location relative to the ORD Area for the entire duration of the modelled event;

- no additional stopbank failure upstream of the site which might otherwise allow for some diminution of flood flows in the ORD Area;
- 1.5m increase in sea level rise, coupled with a spring tide, the peak of which coincides with the peak flood flows; and
- 30% increase in peak flow from climate change.

ECan staff suggested that further confidence could be gained by commissioning an additional assessment from a qualified geomorphologist with understanding of braided river floodplains. While such advice may well increase the overall understanding of how flood conditions might eventually bear out, the proponent considers that the breadth and compound nature of the conservatism applied to the design scenario reflect an appropriate response to the risk-based approach promoted by the RPS and operative Plan.

4.9.2 Mitigation approach in response to model

Mitigation options have been considered in response to the modelling, with the preferred solution involving:

- floor levels for all buildings containing flood-sensitive activities in affected areas being at least 300mm above the 500-year design event;
- no significant increase in risk or displacement effects to surrounding properties relative to the existing environment; and
- no requirement for new or upgraded community-scale protection works/structures.

4.9.3 Existing and proposed authorisation pathways for hazard-sensitive activities

The existing Plan settings enable flood certificates to be granted for flood sensitive activities in areas subject to the 'Urban Flood Assessment Overlay' on a case-by-case basis. In the ORD Area, that overlay applies to portions of the Farm and Hub Areas, along with limited lots within Foundation Area A.

New hazard-sensitive activities in this overlay are permitted where located outside of 'High Flood Hazard Areas' and having a finished floor level equal to or higher than the minimum floor level required under standard NH-S1, being 300mm above the 500-year flood level. What cannot be directly understood from these provisions, or indeed elsewhere in the Plan, is the 500-year flood level inclusive of *all* assumptions, model parameters and other factors that will be used to determine that level. This is relevant to the comments received from ECan regarding expert geomorphological input, and the lack of any guidance as to the circumstances when such input (or other methods) would be required to inform a given flood certification process. The standard notes that the floor level will be determined with reference to 'the most up-to-date models and maps held by Kaikoura District Council or Canterbury Regional Council' and 'any relevant field information.' On plain reading, the standard defers a discretion as to how the 500-year flood level and in turn the acceptable minimum floor level will ultimately be determined for every given case.

Moreover, the permitted activity status for any flood sensitive building is only applicable for the life of a given Flood Hazard Assessment Certificate, which has a maximum duration of three years.

The proponent considers that the above factors carry an inherent uncertainty and inefficiency that should be overcome by new methods in the plan change. The results of the pdp model confirm that it is only in the Farm Area where mitigation would be required to ensure no new flood sensitive activities are established in the 'High Hazard Area' defined by the 500-year design event. No mitigation

is therefore required in those parts of the Urban Flood Assessment Overlay in The Hub Area or in Foundation Area A. The proposed regulatory response for the Farm Area is to:

- introduce a new permitted activity rule for hazard sensitive buildings with a finished floor level at least 300mm above the modelled extent of the 500-year design event – a contour map appended to the Natural Hazards chapter provides the relevant datum points for setting finished levels; and
- exempting subdivision proposals in the Urban Flood Assessment Overlay at Ocean Ridge from Rule SUB-R1.4 where it can be demonstrated that any hazard sensitive building on each proposed lot can comply with the above land use rule.

Overall, the proposed provisions apply a suitable risk-based response to the management of potential effects of a 500-year flood breakout event of the Kowhai River on future flood-sensitive activities locating in that part of the ORD Area which may be susceptible to such effects.

4.10 Other natural hazards

The ORD Area is also subject to planning overlays relating to liquefaction and slope stability (debris inundation). These hazards have been assessed by Fraser Thomas as recorded in the Geotechnical Investigation Report at **Appendix 9** and summarised in **Table 9**. This assessment considered other geotechnical reports commissioned in support of the two previous plan changes applying to the ORD Area, along with historical aerial photographs and field investigations.

Regarding land stability, the assessment found that side slopes in the ORD Area have a satisfactory theoretical factor of safety against deep-seated instability. In the main, any mitigation and remediation required can be addressed through future subdivision and associated earthworks within the operative matters of control/discretion. This includes the identified historical landslide in the Greenlane Area and other localised stability risks. The assessment report considers that the level of risk associated with this potential hazard is low and should not restrict potential use of the area for residential development.

The assessment also notes historical slip events occurring on the slope above Area H. Again, sufficient measures can be applied to manage risk of reactivating the slip through future subdivision processes. In the event, however, that future earthworks in the northwestern portion of the Hub directly downhill from the historical slips proceed ahead of subdivision, a new rule has been included in the plan change requiring any earthworks here with a depth exceeding 500mm to be designed and carried out under the supervision of a qualified geo-professional.

The assessment also notes that some soils in the ORD Area may be subject to liquefaction; however, the authors consider it unlikely that any significant liquefaction induced ground settlement would occur as a result of liquefaction of the dense to very dense sandy gravels or cohesive soils found on site. Based on the field investigations and applying the relevant assessment methodology developed after the recent Canterbury Earthquake Sequence, liquefaction-induced ground damage is expected to be 'none to minor' in both the 'Serviceability Limit State' and 'Ultimate Limit State' design events.

Overall, the assessment report finds the ORD Area to be generally suitable for its intended use under the plan change, subject to appropriate additional consideration of geotechnical risks at future subdivision stages. Apart from the additional rule added to manage earthworks in the Hub Area, the existing subdivision rules in the Plan provide adequate control / discretion for any residual risks to be effectively avoided, remediated or mitigated through conditions and associated physical works.

4.11 Contaminated land

The preliminary site investigation from Fraser Thomas is attached at **Appendix 10** and summarised in **Table 9**. The investigation has been carried out by a suitably qualified professional in accordance with the NES-CS.

No hazardous activities were observed across the majority of the ORD Area during desktop and site investigations; however, some localised areas may have been used for activities associated with potential sources of soil contamination. A detailed site investigation will be required for these areas at future subdivision and earthworks stages in accordance with the NES-CS. If any soil contamination is discovered during those future investigations, recommendations will be made by the qualified expert(s) responsible for the investigations as to measures required to avoid, mitigate or remediate the contamination so as to protect human health and the local environment.

Overall, the risks of soil contamination are considered to be low, and any residual effects will be managed through the subsequent investigations and appropriate application of the relevant national and district planning instruments.

4.12 Community infrastructure

The plan change proposes two main changes to the existing approach to community infrastructure under the operative Plan. These are discussed in turn below and include: ‘community facilities’ at the Hub; and the distribution of reserve areas. That discussion is preceded, however, by a brief overview of relevant terminology used in the operative Plan and the National Planning Standards.

4.12.1 Relevant terminology

The operative Plan uses the term ‘Community Activity’ amongst relevant land use activities anticipated in the ORD Area. The definition for that term is similar to, but not identical with, the defined term ‘Community Facilities’ in the National Planning Standards. A comparison of the two is provided in **Table 12** below.

Table 12: Community-based activity definitions

Term	Source	Definition
Community Activity	Operative District Plan	means the use of land and buildings for the primary purpose of health, welfare, care, safety, education, research, culture and/or spiritual well-being, but excludes recreational activities. A community activity includes schools, hospitals, rest homes, doctors' surgeries and other health professionals, churches, marae, halls, libraries, community centres, police stations, fire stations, courthouses, probation and detention centres.
Community Facility	National Planning Standards	means land and buildings used by the community for recreational, sporting, cultural, safety, health, welfare, or worship purposes, including any ancillary activities supporting their operation

The three most notable differences between the two terms are that:

- ‘recreational’ activities are *excluded* from the definition of ‘Community Activity’ and *included* in the definition of ‘Community Facility’;
- ‘educational’ activities are *included* in the ‘Community Activity’ and *omitted* from the definition of ‘Community Facility’; and
- ‘ancillary activities’ are *accounted for* in the definition of ‘Community Facility’ but *omitted* from ‘Community Activity.’

Given the detailed assessments of economic and transportation effects, the term ‘Community Facility’ has been preferred for the plan change provisions. It also better aligns the Plan with the National Planning Standards at least as far as the ORD Area is concerned.

4.12.2 Community facilities at the Hub

The operative Plan is relatively limiting of community-based activities in the ORD Area. Under operative Rule DEV2-R6 community and recreational activities (excluding *outdoor* recreational activities) are only permitted where located within the dedicated areas on the ODP, being at Kekenno Park and four small ‘pocket’ parks in and around the vicinity where Areas A, B and C (formerly D(i)) coalesce. Outdoor recreational activities are permitted under DEV2-R7, subject to meeting all eighteen standards in the Ocean Ridge chapter.

This arrangement is no longer considered to be fit-for-purpose. With the increased resident population enabled by the plan change will come an increased demand for community facilities. That demand will include activities such as medical centres, community centres, hair and beauty activities as well as recreational activities – both indoor and outdoor.

The expanded Hub Area provides a logical place to encourage such activities, so that they can be co-located with other similar activities, Kekenno Park and commercial and residential activities also promoted at the Hub. As with commercial activities, educational facilities and visitor accommodation activities, appropriate limits have been applied to community facilities in the Hub Area to ensure they remain of a scale (individual and cumulative) that supports the safe efficient function of the transport network and maintains the primacy of existing commercial areas.

Overall, it is anticipated that the nature and scale of activities enabled by the plan change will provide important day-to-day community facilities that support local demands and avoid any adverse environmental effects.

4.12.3 Distribution of reserves

As noted above, the existing ODP anticipates a relatively limited offering for public recreation reserves, with the most significant resource being Kekenno Park.

The plan change enables an additional recreational resource in the southern portion of the ORD Area, well-located to integrate with existing local purpose reserve to the west of Area A and to provide convenient access to residents and visitors in Foundation Areas A and B, as well as new residents and visitors at the Farm Area. The size of that reserve may be increased through a reserve exchange process if it occurs at a later date, which would further enhance these benefits.

The addition of a third major reserve asset in the northern portion of the Greenlane Area will also have benefits for the community. Commonly, where greenfield or existing suburban areas experience

an uplift in anticipated development intensity of the nature anticipated in Greenlane – including smaller standalone lots down to 350m² and medium-density typologies – an appropriate planning response is to provide a corresponding increase in the level of locally-accessible off-site public space. This supports recreational needs which might not otherwise be achievable on smaller lots. Moreover, of all the ORD Area Sub-Areas, Greenlane is the furthest removed from Kekenno Park and the proposed new reserve at the Farm. Providing this third reserve space will ensure the majority of ORD Area residents and visitors have convenient access to local reserve areas, including by active transport modes.

In summary, the proposed provision of reserves is anticipated to result in positive effects for local residents and the wider community, with any adverse effects being no more than minor.

An aerial photograph of a golf course under a clear blue sky. In the foreground, a clubhouse with a large roof is visible on the left, surrounded by trees. A winding path or road runs through the center of the course. To the right, there is a large, calm pond with a small fountain in the middle. The background features rolling hills and a range of mountains with significant snow cover.

PART B

Section 32 Evaluation

5 Scale & significance evaluation

This section derives the level of detail required for the purposes of this evaluation, having regard to the preceding assessment of environmental effects and other relevant criteria. To the extent practicable, economic costs and benefits of the Proposal have been quantified and are also summarised here.

5.1 Scale and Significance

Section 32(1)(c) of the RMA requires that this report contain a level of detail that corresponds with the scale and significance of the environmental, economic, social and cultural effects that are anticipated from the implementation of the Proposal.

The level of detail undertaken for this evaluation has been determined by assessing the scale and significance of the effects anticipated through introducing and implementing the proposed provisions (i.e. objectives, policies, rules and methods) relative to a series of key criteria.

Based on this the scale and significance of anticipated effects associated with this Proposal are identified in **Table 13** below:

Table 13: Summary assessment of scale and significance

Criteria	Scale/Significance			Comment
	Low	Moderate	High	
Addresses a resource management issue				- Management of subdivision and land use are relevant resource management issues for Council under its s31 RMA functions - Provisions implement higher order direction from National and Regional Planning Instruments, and retain aspects of the operative Plan that have proved effective and efficient over time - Addresses matters of national importance and other relevant matters under Part 2 of the RMA
Degree of shift from the status quo				- Many of the operative regulatory methods have been retained or refined to enhance efficiency - The objective for the ORD Area has been broadened to more comprehensively express the anticipated environmental outcome, supported by appropriately re-framed policy direction and refinements to the regulatory approach for certain matters
Who and how many will be affected/				The physical effects of the Proposal on the environment are not dissimilar to the status quo, with some changes being more

Criteria	Scale/Significance			Comment
	Low	Moderate	High	
geographical scale of effect/s				pronounced for limited activities south and west of the ORD Area - Social, ecological and economic benefits will result from the Proposal and new activity limits will ensure any adverse environmental effects are minimal - Overall, the catchment of potential effects from the plan change is relatively confined to the site and local vicinity
Degree of impact on or interest from iwi/Māori				- No formal statement has been received from Te Rūnanga o Kaikōura to confirm the degree of cultural effects arising - A moderate rating has been provisionally assigned for the purposes of this assessment, though this may not ultimately be representative of Rūnanga views - The intent is to acknowledge the potential for effects without potentially skewing the assessment, noting also potential duplication with the degree of risk/uncertainty criteria below - Moreover, there is opportunity for further information to be provided through future dialogue between the proponent and Rūnanga, and should Rūnanga participate in the Schedule 1 RMA process.
Timing and duration of effect/s				- While the overall development duration may be extended by the Proposal, the expectation is that the historical pattern of staged development will continue in much the same way over the foreseeable future in step with demand - No other effects anticipated by the proposed changes are anticipated to have protracted durations or general timing implications that materially differ from the status quo
Type of effect/s				The effects relevant to the Proposal are already administered by various provisions across multiple chapters of the operative Plan

Criteria	Scale/Significance			Comment
	Low	Moderate	High	
				- Where existing provisions remain relevant and have proven effective and efficient over time, they have been retained – where changes have been applied to enhance efficiency and/or to be more enabling of land use development, associated effects will be effectively managed by new rules, standards and other methods - The plan change is also anticipated to result in greater, and more wide-reaching positive effects relative to the status quo
Degree of risk and uncertainty				- To avoid double-counting, the uncertainty identified in relation to the cultural effects criteria above has not been factored in here also - In all other respects, it is considered that the Proposal has been sufficiently informed by relevant technical investigations, consultation and evidence to proceed as proposed - The only area of residual risk relates to the extent of effects from potential fluvial flood events from the Kowhai River – however, the approach to assessing that risk and proposed mitigation in response is conservative, commensurate with the degree of potential effects and consistent with the risk-based approach promoted in relevant policy direction

Overall, for the reasons summarised above, the scale and significance of the proposed provisions are considered to be **low to low-moderate**.

Consequently, a high-level evaluation of these provisions has been identified as appropriate for the purposes of this report.

5.2 Quantification of Benefits and Costs

Section 32(2)(b) requires that, where practicable, the benefits and costs of a proposal are to be quantified.

Based on the assessment of the scale and significance of the proposed provisions in section 5.1, specific quantification of the benefits and costs in this report is not generally necessary, and the more qualitative assessment that follows in section 7 is appropriate.

That said, the proponent has commissioned an assessment of economic effects which has quantified certain benefits and costs of the Proposal. Again, the resulting report is provided in **Appendix 6** and summarised in **Table 9** above.

6 Evaluation of Proposed Objective

6.1 Introduction

Section 32(1)(a) of the RMA requires that this evaluation report to examine the extent to which the objectives of the Proposal are the most appropriate way to promote the sustainable management of natural and physical resources. Section 32(6)(a) applies in this instance as the Proposal contains or states an objective; this is notable to the extent that the plan change purpose would otherwise comprise the ‘objectives’ were no objectives expressly proposed.

An examination of the proposed objective along with a reasonable alternative is included below, with the relative extent of their appropriateness based on an assessment against the following criteria:

1. **Relevance:** Is the objective related to addressing resource management issues and will it achieve one or more aspects of the purpose and principles of the RMA?
2. **Usefulness:** Will the objective guide decision-making? Does it meet sound principles for writing objectives? Does it clearly state the anticipated outcome?
3. **Reasonableness:** What is the extent of the regulatory impact imposed on individuals, businesses or the wider community? Is it consistent with identified tangata whenua and community outcomes?
4. **Achievability:** Can the objective be achieved with tools and resources available, or likely to be available, to the Council?

6.2 Evaluation of proposed Objective DEV2-O1

It is appropriate to consider the proposed objective alongside the operative objective in the ORD Area Chapter to assist the understanding of whether the proposed objective is the most appropriate to achieve the purpose of the RMA. Given the relatively confined scope of the Proposal, no other alternative objectives are considered, noting also the absence of any such requirement RMA s32.

As summarised in **Table 14** below, the proponent has considered the following options for this evaluation:

1. **‘The status quo’** – operative objective DEV2-O1:

To enable the establishment of residential activities and other associated buildings and uses that in terms of number, location and scale, sustain the conservation, landscape and amenity values experienced by locals and visitors to this part of the Kaikōura District.

2. **‘The proposed objective’** – proposed objective DEV2-O1:

The Ocean Ridge Development Area is an attractive, comprehensively planned suburban neighbourhood characterised by:

1. residential areas comprising a mixture of housing types, sizes and tenure arrangements;
2. built form that is appropriately scaled and located in the site context;
3. a vibrant mixed-use area that supports local needs for commercial, community and other non-residential activities;
4. good connectivity for active transport modes and private vehicles alike;

5. a network of reserves that support a variety of active and passive recreational values; and
6. generous areas of native vegetation that positively contribute to landscape and visual amenity, recreational values and to the maintenance and enhancement of terrestrial and freshwater ecological values.

Table 14: Evaluation of objectives

Criteria	Status Quo	Proposed Objective
Addresses a relevant resource management issue	This objective addresses land use activities and structures and their relationship with conservation, landscape and amenity values – all of which are relevant resource management issues.	This objective addresses land use activities, ecological, landscape and amenity values, and the provision of recreational and transportation resources – all of which are relevant resource management issues.
Assists the Council to undertake its functions under s31 of the RMA	The existing objective is directly relevant to Council's functions under s31.	The proposed objective is directly relevant to Council's functions under s31.
Gives effect to higher level documents	The existing objective can be said to implement relevant higher order direction on the maintenance and enhancement of amenity values, including those associated with landscape and conservation elements. This objective predates several of the more recent NPSs.	The proposed objective implements relevant higher order direction, including provisions that directly implement the RMA's purpose and principles in Part 2. The substance of the proposed objective directly addresses direction relating to: - well-functioning, consolidated urban form, which supports the continued safe, efficient function of significant infrastructure; - maintenance and enhancement of the quality of the natural environment, including landscape and ecological aspects, and the integrated management of land use development and freshwater outcomes; - enabling subdivision, use and development while protecting rivers, riparian areas and wetlands; - the provision of housing choice to assist with the meeting of the Region's housing needs; - sustainable economic development and the enabling of businesses in appropriate locations; and - the promotion of active transport modes and provision of good access to and along the coast and surface water, including the Kowhai River.
Guides decision-making	The existing objective makes clear that residential activities are to be enabled provided they sustain conservation, landscape and amenity outcomes. The term 'other associated buildings and uses' could better guide clear, consistent decision-making if it was more express, though	The proposed objective clearly states the various factors that will comprise the ultimate character of the ORD Area. It has been framed to assist with clear, consistent decision-making through future implementation phases.

Criteria	Status Quo	Proposed Objective
	clarification can be derived from the policies and rules that implement this aspect of the objective.	
Consistency with good practice for drafting objectives	The existing objective is not consistent with good practice for drafting objectives. Firstly, it is written in the form of a policy direction, rather than an environmental outcome statement. Moreover, the objective does not clearly relate to all resource management issues relevant to the future use and development of the ORD Area.	The proposed objective has been drafted as a clear outcome statement, consistent with good practice. It is specific to the issues it seeks to address, and is measurable, achievable and realistic.
Consistency with identified tangata whenua outcomes	The existing objective is understood to have been informed by consultation with tangata whenua.	No express outcomes have been identified by tangata whenua in discussions held to date, and no written assessment of relevant values or outcomes has been received. The objective has been drafted having regard to Te Poha o Tohu Raumati.
Consistency with identified outcomes - other stakeholders	The existing objective was informed by consultation with a range of stakeholders in 2004 and 2010. It is unknown at this stage the consistency with which the existing objective met with stakeholder aspirations. It is clear from previous plan change processes, however, that certain stakeholders made submissions on the proposals, seeking a range of different outcomes (including ECan and KiwiRail, for example).	The proposed objective has been framed with regard to feedback received from neighbours and a range of other stakeholders. Generally, the substance of the objective does not present any obvious inconsistency with stakeholder comments received to date. It should be noted also that some issues relevant to certain stakeholders are addressed by other operative objectives in the Plan such that the ORD Area objective does not need to (or should not given the structured approach imposed by the National Planning Standards). Those include, for example, outcomes relating to natural hazards, strategic infrastructure and natural values.
Will not impose unjustifiably high costs on the community / parts of the community	The existing objective does not impose any obvious costs on the community.	The proposed objective does not impose any obvious costs on the community.
Acceptable level of certainty and risk	The existing objective has been informed by information gathered via two previous plan changes. It is understood to be suitably informed as to relevant risks.	The proposed objective has benefited from a further 15 years of research, implementation and changes to statutory planning instruments to enhance the knowledge base. The proponent has further commissioned a suite of expert technical investigations and engaged with multiple stakeholders to inform the substance of the proposed objective. As noted in the scale and significance evaluation above, there is one potential information gap, and one area subject to potential residual risk following the

Criteria	Status Quo	Proposed Objective
		implementation of the Proposal – respectively relating to the identification of cultural values and effects and the management of residual risks from flood breakout of the Kowhai River. The substance of the latter is principally a matter for the Natural Hazards chapter, such that the Ocean Ridge objective need not address it in detail – nor are any changes proposed to the hazard-related objectives. Regarding cultural values, any risks associated with information gaps can be addressed through ongoing discussion between the proponent and Te Rūnanga o Kaikōura, and/or participation of the latter in the pending Schedule 1 process under the RMA. Overall, based on the information compiled to date, there is sufficient certainty in the subject matter of, and knowledge base informing, the proposed objective such that there is minimal associated risk.
Realistically able to be achieved	The existing objective has proven to be realistically achievable.	The proposed objective builds upon the approach already adopted under the operative Plan, albeit with a broader focus. The evidence compiled by the proponent shows that the outcome specified by the objective is feasible and able to be achieved through future implementation processes.

6.3 Overall assessment of objectives

Both the existing and proposed objectives are considered to achieve the RMA's sustainable management purpose. Overall, however, it is considered that the Act's purpose will be better achieved by replacing the existing objective with the proposed as the latter:

- establishes a clear environmental outcome statement for the ORD Area, which more directly addresses the relevant resource management issues for the zone;
- is more measurable and specific than the existing objective;
- better aligns with the relevant statutory direction from the RMA and the national and regional planning instruments implementing that direction; and
- is otherwise comparable with the operative objective in its relevance, usefulness, reasonableness and achievability.

7 Evaluation of Provisions & Alternatives

7.1 Introduction

Under s32(1)(b) of the RMA, reasonably practicable options to achieve the objective/s associated with this proposal need to be identified and examined. This section of the report evaluates the proposed policies and rules, as they relate to the associated objective(s).

Along with the proposed provisions, the Proponent has also identified through the research, consultation, information gathering and analysis undertaken in relation to this topic two reasonable alternatives to achieve the objective.

The technical and consultation input used to inform this process is outlined in section 4 of this report.

7.2 Evaluation method

For each potential approach an evaluation has been undertaken relating to the costs, benefits and the certainty and sufficiency of information (as informed by section 4 of this report) in order to determine the effectiveness and efficiency of the approach, and whether it is the most appropriate way to achieve the proposed objective.

This evaluation is contained in the following sections.

7.3 Provisions to achieve proposed Objective DEV2-O1

For the purpose of this evaluation as summarised in **Table 15**, the Proponent has considered the following potential options:

1. the status quo;
2. the proposed provisions; and
3. a reasonable alternative with a lower regulatory stringency.

Table 15: Options analysis for implementing the Objectives

Proposed Objective/s		
The Ocean Ridge Development Area is an attractive, comprehensively planned suburban neighbourhood characterised by: – residential areas comprising a mixture of housing types, sizes and tenure arrangements; – built form that is appropriately scaled and located in the site context; – a vibrant mixed-use area that supports local needs for commercial, community and other non-residential activities; – good connectivity for active transport modes and private vehicles alike; – a network of reserves that support a variety of active and passive recreational values; and – generous areas of native vegetation that positively contribute to landscape and visual amenity, recreational values and to the maintenance and enhancement of terrestrial and freshwater ecological values.		
Option 1: Status Quo		
	Costs	Benefits
Option 1: Status quo • 11 policies providing direction on the ODP, building controls, planting requirements for ecological restoration and the maintenance of amenity values, non-residential activities, earthworks, servicing and waste management; • 14 rules, which combine land use and built form elements and collectively relate to: – new residential activities; – farming activities; – visitor accommodation; – commercial activities; – display homes; – community and recreational activities; – home businesses; – rest homes; – vegetation removal in identified integration planting areas. • 18 standards relating to the 14 rules; • outline development plan; • non-regulatory methods, including educational material, use of covenants/consent notices, guidelines; • Matters of discretion in Appendix 6; • ORD Area-specific policies, rules and standards in other chapters of the Plan, including: – Strategic Direction;	Economic costs The status quo entails opportunity costs inherent in the limited number of residential and non-residential activities provided for, when the proponent’s evidence base confirms that additional growth and development can be efficiently and effectively provided. Compliance costs will be borne by future applicants and the council through consenting processes. The regulatory stringency of the existing provisions is deemed to be relatively high, noting the prescriptive nature of rules in the Subdivision and DEV2 chapter, and the moderate-high use of non-complying and/or prohibited activity status. Such an approach commonly dictates the need for greater specialist input with associated costs bearing out. There is a greater likelihood of multiple notified resource consent processes being required to deliver the nature and scale of development now anticipated by the plan change under the status quo policy and regulatory settings. Significant private capital will need to be invested to deliver the scale of development anticipated in the existing provisions. Significant private capital will also need to be invested to establish extensive landscaping for restoration and amenity purposes, and to maintain existing and future vegetation in an effective and enduring manner. Lot size minimums are generally in keeping with, or larger than, requirements elsewhere in the District. As noted in the 2024 KSP, these regulatory settings affect affordability that may otherwise be addressed through standalone housing on smaller allotments and/or higher density typologies (townhouses, apartments, row houses, etc). Current provisions anticipate that the majority of dryland restoration areas will be held in a single record of title, with ownership and maintenance obligations and associated provision of public access being the responsibility of a single entity. Indirect costs may be incurred by other parties who interact with future consenting processes, including infrastructure providers, iwi, and/or parties who may become involved in potential notified processes. Social & cultural costs Existing plan settings require reasonably large allotment sizes, which may limit certain members of the community’s ability to own their homes. Similarly, the lack of smaller lots and higher-density housing options in the District fails to provide for families and individuals who prefer more compact, accessible and/or lower-maintenance living arrangements. As noted in the 2024 KSP, greater housing choice is needed to respond to these factors and changing demographics and associated housing needs. The existing ODP provides limited opportunity for new reserves in the northern parts of the ORD Area, which in turn affects accessibility to off-site open space. Moreover, the general approach to the provision of Community Facilities is relatively limiting, again affecting the ability for such activities to readily establish in support of the local community.	Economic benefits The status quo enables economic growth and development associated with the construction sector, as well as on-going employment opportunities through commercial, community and home businesses enabled in existing rules and standards. It also avoids additional costs associated with the Schedule 1 process. Social, cultural & other environmental benefits Existing plan settings enable more than 300 homes to be established in the ORD Area, as well as supporting recreation, community and commercial activities to support day-to-day needs and overall wellbeing. Good access is also afforded to and along the coast and surface water bodies. Controls on built form ensure than impacts on visual amenity are minimal. Extensive restoration and amenity planting required by the existing provisions enhance natural, landscape and other amenity values for local residents, neighbours and transient viewers from the coast, Kowhai River, Kaikōura Golf Club and State Highway. Existing controls relating to natural hazards provide some opportunity for hazard-sensitive activities to be established, subject to detailed assessments demonstrating they are appropriate and/or appropriate avoidance or mitigation of effects is applied.

– Natural Hazards; – Subdivision; – Noise; and – Lighting.	Other environmental costs The status quo provisions lack specific regulatory controls on sensitive activities establishing in proximity to State Highway 1 and the Main North Line railway. Future sensitive activities, if unmitigated, could result in costs on infrastructure providers associated with reverse sensitivity. The provisions enable the progressive urbanisation of the ORD Area, which will modify the existing character of the site towards the environmental result ultimately anticipated. This may result in impacts on people’s amenity values associated with the area, though tight development controls and extensive mitigations are codified in the regulatory settings. These costs have already been deemed as acceptable through previous Schedule 1 processes.	
Effectiveness and efficiency	Effectiveness The status quo provisions would be partially effective in their implementation of the proposed objective, particularly in relation to the implementation of appropriate scale and location of built form and planting requirements to achieve desired landscape, visual amenity and ecology outcomes. This follows, given that the operative and proposed objectives share some commonality as relates to these factors. The operative provisions are less effective at implementing the proposed objective in the following respects: • generally, existing policies, rules and methods are relatively limiting of the housing options to be enabled, particularly as relates to more compact typologies and tenures; • the existing rules and ODP are not sufficiently enabling of the scale and range of non-residential activities needed to provide a dynamic local centre or support the anticipated future population in the ORD Area; • similarly, the existing rules and ODP are sub-optimal in the provision of reserves to support the population distribution anticipated across the ORD Area as a whole. As relates to other objectives in other chapters of the Plan, the status quo has already been tested through schedule 1 processes and found to implement those higher order provisions. That said, there are no express rules in the Plan to address potential nuisance and / or reverse sensitivity effects arising where new noise-sensitive activities establish in proximity to existing significant infrastructure. There is also the matter of the existing prohibited activity rule in the subdivision chapter to consider. This rule precludes any application being made to create more than 336 allotments. The proponent is therefore unable to pursue the residential yield now desired under the status quo. A change to the Plan is necessary.	Efficiency In general, the status quo provisions address relevant matters and establish approvals pathways for a range of appropriate activities and built form. However, the existing rules do not optimise opportunities for regulatory efficiency, inclusive of over-reliance on discretionary, or non-complying activity status when more regular use of restricted discretionary status is appropriate. The use of prohibited status for any exceedance of 336 households in the subdivision rules also does not seem supportable based on the evidence compiled by the proponent. Compounding the inefficiency inherent in the existing regulatory approach, the matters of discretion in Appendix 6 are very broadly cast and in some cases unnecessarily so. This is amplified further by the relevant references to the appendix in the rules and standards (across the Plan) which do not specify relevant topic areas in Appendix 6 to be considered. An additional inefficiency with the status quo provisions derives from land use activities and buildings/structures being aggregated under combined rules. Each of these rules also requires compliance with all 18 of the standards in the ORD Area chapter, despite many being irrelevant to a given activity under any relevant rule. This approach ignores that built form effects are distinct from activity-based effects and can be more efficiently assessed by tighter application of only those standards that are relevant to a given activity, building or structure. There are also omissions in the DEV2 rules table of activities which might be permissible (at least to some degree), but which are captured by the ‘catch-all’ discretionary activity rule. Examples include earthworks, fencing, planting and removal of vegetation. These omissions require unnecessary compliance costs to be incurred, and in some cases may perversely discourage activities which contribute substantial environmental benefit. The general approach to the implementation of the ODP is also considered to be overly rigid and ignores that alternative subdivision patterns and associated distribution of key structural elements on the ODP could result in similar or better outcomes. The plan change represents the third iteration of the ODP, which is illustrative of the fact that the regulatory implementation of the ODP should be sufficiently flexible to allow departures from the ODP in an efficient way, where appropriate. For the reasons expressed in section 4 of Part A above, the existing natural hazard rules are considered sub-optimal in terms of regulatory efficiency. This is owing to the uncertainty inherent in the process for determining the 500-year flood event and associated finished floor levels necessary to mitigate associated risks. Compounding this is the three-year shelf life for flood certificates, which would likely lead to the following inefficiencies in the Farm Area at Ocean Ridge given the potentially moderate- to-long-term lead time to complete all stages of subdivision there: • either ad hoc certification applications will be made for individual dwellings as subdivision stages are completed, lots are purchased, and dwellings designed and consented; or • a comprehensive certification could be obtained for all lots in a given stage of subdivision, though re-application would be required if any one or more dwellings are not constructed within the three years of the certificate being issued.
Overall evaluation	This option is the second most appropriate of the three considered. While it would be partially effective, it fails to fully implement the proposed objective as relates to housing choice and supporting commercial, community, recreational and other non-residential activities necessary to support the local population’s day-to-day needs. It also carries inherent inefficiencies which are not justified on the evidence underpinning the plan change and precludes the ability to apply for subdivision beyond 336 allotments. It would otherwise implement all other relevant objectives specified in other chapters of the Operative Plan.	

Option 2: Proposed provisions		
	Costs	Benefits
Option 2: Proposed provisions 15 policies providing direction on: - housing choice and the associated built form considerations for housing outcomes anticipated for each Sub-Area; - the activity mix and built form at the Hub Area; - planting requirements for ecological restoration and the maintenance of amenity values; - the ODP; - home businesses; - public open space; - earthworks; and - servicing. 16 rules for land use activities, including: - new residential activities; - farming activities; - visitor accommodation; - commercial activities; - display homes; - community facilities and outdoor recreational activities; - home businesses; - educational facilities; - planting of vegetation; - outdoor storage; - shared parking areas; - earthworks; - retirement villages; - industrial activities. 5 buildings and structures rules, including: - Maintenance, repair, demolition or removal of existing buildings; - New residential units and buildings for non-residential activities;	Economic costs The proposed provisions entail costs borne by the proponent and other participants in the Schedule 1 RMA process, which would be avoided by maintaining the status quo. These costs are substantial. As with Option 1, compliance costs will be borne by future applicants and the council through consenting processes. However, the regulatory stringency of the proposed provisions is likely to be relatively more cost-effective, with greater reliance on restricted discretionary and discretionary activity status where possible, and less on non-complying or prohibited. Significant private capital will need to be invested to deliver the scale of development anticipated in the proposed provisions. This will be a larger sum relative to the status quo. Significant private capital will also need to be invested to establish extensive landscaping for restoration and amenity purposes, and to maintain existing and future vegetation in an effective and enduring manner; however, the overall capital outlay is likely to be lower than the status quo and more equitably spread across multiple parties. Indirect costs may be incurred by other parties who interact with future consenting processes, including infrastructure providers, iwi, and/or parties who may become involved in potential notified processes. Social & cultural costs The proposal anticipates a potential reduction in available reserve land at Kekenō Park, enabled by future reserve exchange. Any reduction in reserve land would be offset by new land to be vested in Council as part of any exchange. There is already provision for this possibility within planning for the Farm Area. In the absence of formal confirmation from Te Rūnanga o Kaikōura, it is unclear whether the Proposal will result in any additional cultural costs relative to the status quo. The proponent has committed to further dialogue with the Rūnanga, and further understanding of any potential costs may be obtainable over the post-lodgement sequence. Other environmental costs The provisions enable the progressive urbanisation of the ORD Area, which will modify the existing character of the site towards the environmental result ultimately anticipated. This may result in impacts on people’s amenity values associated with the area, though tight development controls and extensive mitigations are codified in the regulatory settings. The Proposal does not include any anticipated clearance of existing restoration planting areas, and there are accordingly no costs anticipated as relates to associated ecological factors. There is, however, an <i>opportunity cost</i> associated with the reduced overall area to be dedicated to restoration planting. Current regulatory settings (standard SUB-S11) anticipate 1ha of planting per 7.5 houses created, or 44.8ha of planting for the overall yield of 336 houses enabled. The new restoration plan conservatively estimates at least 42.7ha of planting. While the restoration quantum per home is lower (1ha/11 homes) than the status quo, the overall area dedicated to planting is comparable and remains substantial in total area, commensurate with the values particular to the ORD Area.	Economic benefits The Proposal enables economic growth and development associated with the construction sector, as well as on-going employment opportunities through commercial, community and home businesses enabled in existing rules and standards. Some efficiencies may also bear out through intensification of Greenlane and the Hub Areas and the introduction of residential activities in the Farm Area associated with an increase in the number of dwellings that can be serviced by existing services, and/or services which can be efficiently upgraded. The Proposal also introduces cost savings for future consenting processes through lower overall regulatory stringency. Social, cultural & other environmental benefits The Proposal will enable 486 homes to be established in the ORD Area, as well as supporting recreation, community and commercial activities to support day-to-day needs and overall wellbeing. Relevantly, this includes opportunities for standalone dwellings on smaller lots in Greenlane and the Hub, as well as medium-density housing options in these areas and at the Farm. Also significant, the nature and scale of non-residential activities is broadened relatively the status quo, but with appropriate limits to ensure the net effect remains positive, and any meaningful adverse effects avoided or mitigated. Controls on built form ensure than impacts on visual amenity are minimal. Extensive restoration and amenity planting required by the existing provisions enhance natural, landscape and other amenity values for local residents, neighbours and transient viewers from the coast, Kowhai River, Kaikōura Golf Club and State Highway. Good access is also afforded to and along the coast and surface water bodies, and public access to all existing and proposed tracks will be assured by way of legal mechanisms at future subdivision stages. Existing and proposed controls relating to natural hazards provide some opportunity for hazard-sensitive activities to be established, subject to detailed assessments demonstrating they are appropriate and/or appropriate avoidance or mitigation of effects is applied. In the case of existing land stability risks, future earthworks and construction activities associated with subdivision of affected areas will afford effective mitigation of any future recurrence or exacerbation of effect. In the absence of formal confirmation from Te Runanga o Kaikoura, it is unclear whether the Proposal will result in any additional cultural benefits relative to the status quo. The proponent has committed to further dialogue with the Rūnanga, and further understanding of any potential benefits may be obtainable over the post-lodgement sequence.

– Multi-unit housing proposals and built form associated with retirement villages. • 18 standards relating to the proposed rules, specified by activity or building/structure; • New outline development plan; • retention of non-regulatory methods; • new defined terms, including some sourced from the national planning standards, along with nesting tables; • Matters of discretion under rules and standards or otherwise reference Appendix 6; • Changes to ORD Area-specific policies, rules, standards or other methods in other chapters of the Plan, including: – new information requirement for all future subdivision regarding detailed restoration plans; – minor amendments to explanatory text in Urban Form and Development chapter; – New rule for sensitive activities in Urban Flood Assessment Overlay where above 500-year modelled flood extent; – Subdivision, including refinements to relevant policy, rules and standards; – Cross reference to ORD Area earthworks rules in Earthworks chapter; – New/amended noise provisions to manage noise received by noise-sensitive activities from strategic infrastructure; and • Retention of all other provisions applicable to the ORD Area in other chapters.		
Effectiveness and efficiency	Effectiveness The proposed provisions will implement all aspects of the proposed objective in a manner that will also effectively implement the balance of relevant objectives in the Plan. Regarding DEV2-O1:	Efficiency The proposed provisions have generally been drafted to optimise regulatory efficiency overall, inclusive of greater use of restricted discretionary and discretionary activity status where appropriate (relative to the status quo) and clear articulation of relevant assessment matters in policy direction and relevant rules. There is scope to further enhance the efficiency of authorisation processes associated with higher-density housing typologies; however, such an approach would likely require a greater level of prescription to be adopted in the precise location of such

	- A mixture of housing types, sizes and tenures are delivered by the variable minimum lot size requirements codified in the ODP, the built form standards and the consent-based authorisation for medium density housing types; - Built form standards and associated policy direction are enabling of the residential and non-residential activities desired, whilst also ensuring their scale is suitable to the local site context; - The ODP and future subdivision processes will provide good multi-modal connectivity throughout the ORD Area; - Open space and recreational values will be enhanced through a broader reserve network; and - Restoration and amenity planting will be delivered in future subdivision and land use phases, with appropriate mechanisms put in place for the long-term management and ownership of these areas. As relates to other relevant objectives in other chapters of the Plan, the Proposal: - Enables urban growth where any adverse effects on natural and physical resources are effectively avoided, remedied or mitigated and efficient use and upgrading of associated infrastructure is provided for²⁸; - Provides for sustainable development which promotes a close relationship between areas with different characteristics, provides for visitor accommodation activities and avoids or mitigates adverse character and amenity effects²⁹; - Includes policies, rules and methods that will effectively manage risk of natural hazards to people and property³⁰; - Ensures development is managed to maintain or enhance natural character values, and the natural values of wetlands and surface water³¹; - Includes provisions which have been appropriately informed by, and retain visual amenity values associated with, the landscape qualities of the ORD Area³²; - Includes provisions to ensure future subdivision is appropriately serviced, is well-designed, and manages potential effects of soil contamination³³; and - Includes provisions to provide for the safe, efficient function of the transport network, including avoidance or mitigation of potential reverse sensitivity effects³⁴.	housing, and the outer effects envelop that could be permitted. The plan change foregoes the opportunity for greater efficiency in this respect in favour of greater flexibility in the future location and form of medium density development. Applications will be assessed on merits on a case-by-case basis with direction provided to decision-makers that the developments should be authorised where they are of an appropriate scale for the applicable context, and they contribute positively to the public realm. The proposed approach also introduces efficiencies in the proposed rule format, with land use activities now separate from buildings and structures and only relevant standards being applied. Existing omissions in the operative rules are also accounted for in new rules to avoid appropriate activities being assessed as non-complying activities by virtue of being otherwise innominate. Further efficiencies are delivered through expansion of the notification clause in the introduction of the Rules section of the chapter. Greater flexibility is also afforded in the proposed rules and standards to recognise that the ODP is not the only development pattern capable of providing the desired outcomes for the area and to enable ‘overs and unders’ for each Sub-Area provided that the overall residential yield is maintained. Where that overall yield is exceeded, consent would now be able to be sought and granted if it can be demonstrated that the attendant outcomes are appropriate (in contrast to the operative prohibition on such applications). Enabling restoration areas to be maintained, owned, and administered by multiple parties enables associated costs to be efficiently distributed over time; and provided appropriate mechanisms are applied at subdivision stage as required by the proposed rules, the proposed approach can be as effective as the status quo in terms of the overall environmental result anticipated. Considerable enhancements in efficiency are anticipated with the application of new rules to manage flood breakout effects from the Kowhai River. Potentially flood-sensitive activities in relevant areas can now be permitted, provided that specific minimum floor levels are achieved. This bypasses the existing certification process, which relies on uncertain assessment-based processes and is only valid for a short time.
Overall evaluation	This option is anticipated to have a high net benefit and is the only option that will effectively and efficiently achieve the proposed objective in full, as well as all other relevant objectives in the operative Plan. It is the most appropriate option .	

Option 3: Lower regulatory stringency		
	Costs	Benefits
Option 3: Lower regulatory stringency - Comparable policy direction to the proposed option, albeit with: - no direction limiting the location or minimum quality of standalone dwellings,	Economic costs Like Option 2, Option 3 entails costs borne by the proponent and other participants in the Schedule 1 RMA process, which would be avoided by maintaining the status quo. These costs are substantial. As with Option 1, compliance costs will be borne by future applicants and the council through consenting processes. However, the regulatory stringency of this option is likely to be the most cost-effective, with lower reliance on consent-based processes and greater use on restricted discretionary and discretionary activity status where consent is required.	Economic benefits Option 3 is the most enabling of economic growth and development associated with the construction sector, as well as on-going employment opportunities through commercial, community and home businesses enabled in existing rules and standards. Option 3 is also anticipated to have the lowest overall regulatory and compliance costs. Social, cultural & other environmental benefits

²⁸ Per UFD-O1 & UFD-O2
²⁹ Per UFD-O3, UFD-O4 & UFD-O6
³⁰ Per SUB-O1, NH-O1 through NH-O4
³¹ Per CE-O1 through CE-O3, ECO-O1, ECO-O2, SUB-O5
³² Per NFL-O3 & NFL-O7
³³ Per SUB-O2, SUB-O6, SUB-O7
³⁴ Per TRAN-O1 through TRAN-O3

multi-unit housing or retirement villages; – unqualified provision for non-residential activities in the Hub Area; – lesser requirements for restoration planting, amenity planting and public open space; and – demotion of ODP to a non-regulatory method with attendant changes to related policy direction. • Comparable rules, standards and methods to the proposed option, albeit with: – no limits on the overall number of houses across the site or by Sub-Area; – permitted activity pathway for multi-unit and retirement village proposals, subject to generous bulk and location standards; – demoting restoration and amenity planting requirements to non-regulatory methods; – no limits as to scale of non-residential activities in the Hub Area or to the structured management of associated built form; – no requirements to attenuate noise from strategic transport infrastructure; – deletion of hazard overlays, but avoidance of sensitive activities being established in low-lying areas affected by baseline flood breakout event.	Significant private capital will need to be invested to deliver the scale of development anticipated in the proposed provisions. This would be a comparable sum to Option 2, or greater if the lack of any activity limits resulted in a greater development intensity overall. Less private capital would theoretically be required to establish extensive landscaping for restoration and amenity purposes, and to maintain existing and future vegetation in an effective and enduring manner. There is high uncertainty as to what the overall restoration outcome would be with the adoption of a more lenient approach in this regard. Indirect costs may be incurred by other parties who interact with future consenting processes, including infrastructure providers, iwi, and/or parties who may become involved in potential notified processes; however, this option minimises such costs. Social & cultural costs This option assumes a reduction in available reserve land at Kekenō Park, enabled by future reserve exchange. Any reduction in reserve land would be offset by new land to be vested in Council as part of any exchange. There is already provision for this possibility within planning for the Farm Area. In the absence of formal confirmation from Te Rūnanga o Kaikōura, it is unclear whether the Proposal will result in any additional cultural costs relative to the status quo. Uncontrolled development in the Hub Area could result in potential distribution effects on existing centres and the new light industrial area. Such activity would likely have to be significant in order to reduce the overall vitality of existing centres. Allowing potentially hazard sensitive activities to establish in the parts of the Farm which are above the <i>baseline</i> 500-year flood event, but do not account for potential <i>residual</i> risks of hazard effects being exacerbated by climate change effects and/or the unpredictable changeability of the Kowhai River’s morphology, could expose people and property to unacceptable risk. Other environmental costs This option enables the progressive urbanisation of the ORD Area, which will modify the existing character of the site towards the environmental result ultimately anticipated. This may result in impacts on people’s amenity values associated with the area, with this option being the most likely to do so given the lower stringency. Without clear requirements for restoration and amenity planting, there is a risk that desired outcomes would not be achieved. This option has the highest potential opportunity cost associated with current unimplemented restoration areas remaining unrestored. Like the status quo, this option omits any specific regulatory controls on sensitive activities establishing in proximity to State Highway 1 and the Main North Line railway. Future sensitive activities, if unmitigated, could result in costs on infrastructure providers associated with reverse sensitivity. Relegating the ODP to a non-regulatory method similar to the guidelines in Appendix 1 of the operative Plan introduces uncertainty that the desired outcomes for the ORD Area will be achieved.	Option 3 is the most enabling in terms of housing choice, including more affordable housing options and the efficient subdivision of land. It is also the most enabling of choice and innovation in terms of built form outcomes. This option may provide for ecological and amenity benefits from planting activities, though there is some uncertainty associated with the option as to the quantum and quality of the planting that would ultimately be delivered. In the absence of formal confirmation from Te Runanga o Kaikoura, it is unclear whether this option will result in any additional cultural benefits relative to the other two options.
Effectiveness and efficiency	Effectiveness These provisions would be partially effective in their implementation of the proposed objective, particularly in relation to the implementation of desired outcomes for housing choice and an appropriate network of reserves, appropriate scale and location of built form and planting requirements to achieve desired landscape, visual amenity and ecology outcomes. This follows, given that the operative and proposed objectives share some commonality as relates to these factors. Option 3 is less effective at implementing the proposed objective in the following respects: • built form may ultimately exceed that scale appropriate to a given site context;	Efficiency Option 3 represents the lowest-cost option associated with future use and development of the ORD Area. It has the lowest reliance on future consenting processes and the most liberal allowances for land use activities and associated built form. It has been designed to optimise housing choice and the vibrant function of the expanded mixed-use area. Option 3 enables the greatest flexibility as to the future layout of the area and the final scale and composition of restoration areas. Like Option 2, enabling restoration areas to be maintained, owned, and administered by multiple parties also enables associated costs to be efficiently distributed over time; though with less certainty this option can be as effective as other two in terms of the overall environmental result anticipated.

	• while this option would theoretically be the most enabling of a range of activities in the Hub Area, that scale could exceed the express outcome in DEV2-O1 that the mixed-use area supports <i>local</i> needs; • low certainty is provided by this option as to the likelihood that connectivity, amenity or ecological outcomes will be achieved or that the net result will be an attractive or comprehensively planned neighbourhood. As relates to other objectives in other chapters of the Plan, Option 3 is the most likely to risk desirable outcomes being unimplemented, particularly as relates to: • urban growth where any adverse effects on natural and physical resources are effectively avoided, remedied or mitigated and efficient use and upgrading of associated infrastructure is provided for³⁵; • sustainable development which promotes a close relationship between areas with different characteristics, provides for visitor accommodation activities and avoids or mitigates adverse character and amenity effects³⁶; • effective management of risks from natural hazards to people and property³⁷; • the maintenance or enhancement of natural character values, and the natural values of wetlands and surface water³⁸; • the retention of visual amenity values associated with the landscape qualities of the ORD Area³⁹; and • the safe, efficient function of the transport network, including avoidance or mitigation of potential reverse sensitivity effects⁴⁰.	Like Option 2, this option also enables potentially flood-sensitive activities in relevant areas, albeit no minimum floor levels are specified. This bypasses the existing certification process, which relies on uncertain assessment-based processes and is only valid for a short time, but may not account for residual risks associated with a major breakout of the Kowhai River.
Overall evaluation	This option is the third most appropriate for achieving the objectives. It prioritises housing choice and the cost-effective development of the ORD Area over other outcomes. It has the lowest certainty associated with the effective implementation of the proposed objective overall and has the greatest risk of precluding other outcomes anticipated by objectives in other Chapters of the operative Plan.	

³⁵ Per UFD-O1 & UFD-O2
³⁶ Per UFD-O3, UFD-O4 & UFD-O6
³⁷ Per SUB-O1, NH-O1 through NH-O4
³⁸ Per CE-O1 through CE-O3, ECO-O1, ECO-O2, SUB-O5
³⁹ Per NFL-O3 & NFL-O7
⁴⁰ Per TRAN-O1 through TRAN-O3

8 Risk of acting or not acting

A risk assessment is only required under s32 where there is insufficient or uncertain information about the subject matter of the plan change provisions.

As described in Part A above, there are two potential matters where the available information gives rise to a risk assessment:

- unpredictability of morphological change and flood characteristics of the Kowhai River; and
- cultural values.

Each is assessed in turn below.

8.1 Kowhai River Flooding

The substance of this issue has been discussed at several junctures in Part A and Part B of this plan change request. It relates primarily to the *residual risk* of the Kowhai River breaking its stopbanks and the potential for the effects of such an event to be exacerbated by various natural processes and other relevant factors over time. As noted previously, there are only isolated low-lying parts of the Farm Area under *existing* conditions that would be expected to result in high hazard risks in 200- of 500-year flood events.

The main area of risk from acting as proposed by the plan change assumes that the flood modelling and associated assessments have underestimated potential flooding effects, and that people and property may be subjected to unacceptable residual risk from future breakout events. The risk in this respect is one of a very low probability but potentially high consequence.

The net result of not acting is the avoidance of that potential low-probability-high-consequence hazard outcome, but with an opportunity cost associated with the disenabling of otherwise appropriate additional housing supply and choice in an integrated development that also supports consolidation, amenity and ecological outcomes.

There are alternative locations in Kaikoura to provide for housing and business activities of a similar scale over the short, medium and long term; however, current plan settings will eventually need to be amended to either rezone existing non-urban land, to better enable infill and multi-unit housing in existing urban areas, or some combination of the two if shorter-term choice demands and longer-term supply demands in the District are to be met. Some such options may be inferior to this plan change when all relevant constraints, opportunities and effects are taken into account, and some may be superior.

The same outcome as sought by the plan change could also be delivered through a series of future resource consent applications and/or flood certification processes; however, this is considered undesirable given the regulatory uncertainty of the status quo flood certification process and/or the potential inefficiencies associated with ad hoc certification and short shelf life applying to any given certificate.

Ultimately, it is considered that the risk of acting has been sufficiently addressed by virtue of the compound conservatisms applied to the design scenario used to inform finished floor levels under the plan change provisions. This approach applies a similar methodology to what would be used for

certification processes under the operative Plan but delivers greater clarity and certainty than the status quo.

8.2 Cultural values

As noted previously, the proponent has discussed the Proposal with Te Rūnanga o Kaikōura representatives at junctures during 2025, but no formal statement of cultural values or potential impacts on those values arising from the plan change have been received to date.

The plan change includes provisions that address matters set out in *Te Poha o Tohu Raumati*; however, it is for the Rūnanga to identify how well aligned the plan change provisions are with *Te Poha o Tohu Raumati* or other relevant values.

The probability of adverse cultural effects or cultural benefits resulting from the Proposal is uncertain; the consequences (both positive and negative) are also uncertain but might realistically range from negligible to potentially significant in scale.

In these circumstances, the proponent considers there is sufficient confidence to act as proposed by the plan change given:

- the existing nature and character of the ORD Area and the low-moderate level of change envisaged by the plan change;
- the commitment to advance further discussions with the Rūnanga and to address issues raised;
- the scope of the plan change provisions and the ability to alter provisions of relevance to the matters set out in *Te Poha o Tohu Raumati*;
- that the Schedule 1 RMA process enables Te Rūnanga o Kaikōura to formally submit on the plan change if desirable which may provide greater certainty in this regard.

An aerial photograph of a landscape, likely a golf course or park, with a winding road, a pond, and snow-capped mountains in the background. The word "Appendices" is overlaid in white text.

Appendices

Schedule of Appendices

(Attached separately)

Appendix 1	Proposed changes to operative District Plan
Appendix 2	Concept Masterplan
Appendix 3	Landscape & Visual Effects Assessment
Appendix 4	Restoration Management Plan
Appendix 5	Ecological Impact Assessment
Appendix 6	Economic Impact Assessment
Appendix 7	Infrastructure Assessment
Appendix 8	Stormwater Modelling
Appendix 9	Geotechnical Assessment
Appendix 10	Preliminary Site Investigation
Appendix 11	Integrated Transportation Assessment
Appendix 12	Fluvial Flood Assessment