BEFORE THE HEARINGS PANEL
FOR HEARING STREAM 4 ON THE PROPOSED WAITAKI DISTRICT PLAN

UNDER the Resource Management Act 1991 (RMA)

IN THE MATTER of the Proposed Waitaki District Plan

STATEMENT OF EVIDENCE OF ANDREW MACLENNAN ON BEHALF OF THE CANTERBURY REGIONAL COUNCIL

HEARING STREAM 4 (RESIDENTIAL, RURAL LIFESTYLE, COMMERCIAL, INDUSTRIAL, AND OPEN SPACE AND RECREATION ZONES, AND HISTORIC HERITAGE) ON THE PROPOSED WAITAKI DISTRICT PLAN

3 November 2026

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SUMMARY STATEMENT

1. The Canterbury Regional Council (**CRC**) made submissions on various provisions in the proposed Waitaki District Plan (**PDP**) on topics covered in Hearing Stream 4. These submissions were made to give effect to the Canterbury Regional Policy Statement 2013 (**CRPS**) and to ensure that CRC can continue to undertake its statutory functions under the RMA, including the integrated management of the natural and physical resources of the region.

2. I have reviewed the section 42A reports prepared for Waitaki District Council (**WDC**) on the Residential Provisions (Emily McEwan), the Rural Lifestyle Zone (Marcus Langman), the Commercial Zones (Caitlin Parsons), the Industrial Zones and the Open Space and Recreation Zones (Katrina Clark), and Historic Heritage (Briar Belgrave), each dated 19 October 2026. My evidence presents my opinion on their recommendations, with reasons, and suggests additional points for consideration.

3. CRC supports the recommendations on most of its submission points, for the reasons given in the section 42A reports. Appendix 1 to my evidence records CRC's response to each submission point where CRC sought an amendment to a provision. Where CRC sought that a provision be retained as notified, or recorded a neutral position, and the section 42A officer's recommendation does not affect CRC's position, I have not listed the point in Appendix 1 or addressed it in the body of my evidence.

4. The body of my evidence addresses two matters:

   (a) the servicing of buildings where reticulated services are unavailable, in the:

      i. General Residential Zone (GRZ-S11),

      ii. Rural Lifestyle Zone (RLZ-S9),

      iii. Local Centre Zone (LCZ-S12), and

      iv. Mixed Use Zone (MUZ-S12); and

   (b) the definition of "conservation activities".

5. I agree with the section 42A officers that a standard requiring on-site servicing is not needed in these zones. In the LCZ and MUZ, I accept the officers' advice that the zones are serviced by reticulated infrastructure, and I agree that no change is required to LCZ-S12 or MUZ-S12. In the GRZ and RLZ, each zone has a policy directing that development is appropriately serviced, and I recommend a note on GRZ-S11 and RLZ-S9 that directs plan users to the regional plan and the Building Act 2004 where reticulated services are not available. I also recommend that "vehicle parking" is deleted from the examples of ancillary activities in the definition of conservation activities.

INTRODUCTION

6. My full name is Andrew Cameron Maclennan.

7. I am an Associate at the firm Incite. I have been contracted by CRC to assist with several hearing streams of the Waitaki District Plan Review.

QUALIFICATIONS AND EXPERIENCE

8. My qualifications and experience are listed in my evidence for Hearing 2, dated 14 September 2026.

CODE OF CONDUCT

9. I can confirm that I have read and am familiar with the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023. I have complied with the Code of Conduct in preparing this evidence and I agree to comply with it while giving any oral evidence during this hearing. Except where I state that I am relying on the evidence of another person, my evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

10. Although I am contracted by CRC, I am conscious that in giving evidence in an expert capacity, my overriding duty is to the Hearings Panel.

SCOPE OF EVIDENCE

11. My evidence relates to topics covered in Hearing Stream 4, namely the Residential, Rural Lifestyle, Commercial, Industrial, and Open Space and Recreation zone provisions, the Historic Heritage provisions, and the definitions addressed in those section 42A reports.

12. CRC lodged submissions on those topics, largely in support of the proposals. CRC sought some further alignment with the CRPS.

13. Waitaki District lies partly within the Canterbury region and partly within the Otago region. My evidence relates to the whole of the district, because the PDP provisions I address apply district-wide. I have considered both the CRPS and the ORPS 2021 in preparing this evidence.

14. My evidence has been structured to address:

    (a) CRC's interest in the topics covered by Hearing Stream 4;

    (b) the servicing standards in the General Residential, Rural Lifestyle, Local Centre and Mixed Use Zones (GRZ-S11, RLZ-S9, LCZ-S12 and MUZ-S12), and the rules that reference them (RLZ-R1, RLZ-R4, LCZ-R1 and MUZ-R1);

    (c) the definition of "conservation activities"; and

    (d) Appendix 1, which records CRC's response to each of its submission points that sought an amendment to a provision, and my opinion on whether the recommended amendments address the concerns raised in CRC's submission. Submission points where CRC supported a provision and the section 42A officer recommends retaining it are not listed.

15. My evidence addresses the planning issues raised by CRC's submission.

CANTERBURY REGIONAL COUNCIL'S INTEREST IN THE HEARING STREAM 4 TOPICS

16. The focus of CRC's submission was to support WDC in implementing and giving effect to the CRPS, to ensure that the provisions of the PDP are consistent with the regional planning framework, and to enable

integrated management of the natural and physical resources of the region.

17. I have not sought to repeat all of the relevant provisions contained in national and regional planning documents. My evidence focuses on those I consider to be most relevant to the matters covered under Hearing Stream 4, and the submissions made by CRC.

18. Where I recommend an amendment to the PDP within this evidence, I have shown my recommended amendment in red tracked changes over the black tracked changes recommended in the relevant section 42A report. The black text therefore shows the provision as the section 42A officer recommends it, and the red text shows the further change I recommend.

SERVICING WHERE RETICULATED SERVICES ARE UNAVAILABLE

CRC's submission points

19. CRC sought the same amendment to clause 1 of the servicing standard in four zones: GRZ-S11 (271.548), RLZ-S9 (271.640), LCZ-S12 (271.674) and MUZ-S12 (271.718).

20. CRC also sought that the rules referencing those standards be amended consistently (RLZ-R1 (271.613), RLZ-R4 (271.616), LCZ-R1 (271.650) and MUZ-R1 (271.690)). The amendment sought was:

> *All new buildings must be connected to reticulated services where these are available. Where reticulated services are unavailable, buildings must be provided with stormwater and wastewater systems, and potable water that meets regional council requirements; and …*

The section 42A recommendations

21. Each section 42A officer recommends rejecting the amendment, for the following reasons:

    (a) **GRZ-S11:** the urban areas where the GRZ applies are serviced by reticulated wastewater and water supply, unreticulated stormwater is managed through the Stormwater chapter, and the Subdivision

chapter addresses sites where connections are unavailable (Residential Provisions report, paras 490 to 493). The officer considers this approach gives effect to CRPS Policy 5.3.5 (para 493);

(b) **RLZ-S9:** the amendment would require a consent from the district council where a consent would already be required from the regional council, which would duplicate functions (Rural Lifestyle Zone report, para 155);

(c) **LCZ-S12:** the LCZ applies to established urban centres that are anticipated to be serviced by reticulated infrastructure, and no circumstance has been identified that needs an alternative on-site servicing pathway (Commercial Zones report, para 139); and

(d) **MUZ-S12:** the MUZ applies to areas serviced by reticulated infrastructure. The officer states that all Mixed Use Zone land identified in the PDP is serviced by reticulated infrastructure (Commercial Zones report, paras 190 and 197).

Assessment

22. I agree with the section 42A officers that a district plan standard requiring on-site servicing is not necessary in these zones. The discharge of wastewater or stormwater to land or water is managed by the relevant regional plan. A district rule triggering consent for the same matter would duplicate that function.

23. In the GRZ, I consider SUB-S6 (Water supply), SUB-S7 (Wastewater disposal) and SUB-S8 (Stormwater management) are sufficient to ensure that new allotments are appropriately serviced. Where a reticulated connection is unavailable, these standards require a self-sufficient potable water supply of at least 10,000 litres, on-site wastewater disposal certified as achievable under the relevant regional plan (or a regional resource consent), and stormwater disposal to ground away from areas of instability or inundation.

24. Where a dwelling is built on an existing lot without subdivision, servicing is managed through the Building Act 2004. All building work must comply with the Building Code (section 17), and a building consent authority must not grant consent unless it is satisfied that the work will comply with the Building Code (section 49). The relevant Building Code

clauses are G12 (Water supplies), G13 (Foul water) and E1 (Surface water).

25. In the LCZ and MUZ, I accept the officers' advice that the zones are serviced by reticulated infrastructure. The LCZ applies to established urban centres that are anticipated to be serviced by reticulated infrastructure, and the officer states that all Mixed Use Zone land identified in the PDP is serviced by reticulated infrastructure. The circumstance CRC's amendment addresses is therefore unlikely to arise in these zones, and I agree with the officers that no change is required to LCZ-S12 or MUZ-S12.

26. In the GRZ and RLZ, sites without a reticulated connection are possible. The GRZ officer relies on the Subdivision chapter to address sites where connections are unavailable, and the RLZ officer's reasoning assumes a regional consent will be required for on-site servicing. Each zone also contains a policy directing that development is appropriately serviced:

    (a) **RESZ-P2(9)**, as recommended, seeks to ensure "all new buildings are appropriately serviced, including wastewater, stormwater and water supply with sufficient capacity for firefighting purposes and firefighting access". The Residential Provisions report records that clause 9 of RESZ-P2 sets up the method of requiring servicing in GRZ-S11 (para 495); and

    (b) **RLZ-P3(5)**, as recommended in response to CRC's submission (271.609), requires "development to be adequately serviced for wastewater and stormwater collection, treatment and disposal" (Rural Lifestyle Zone report, para 87).

27. The servicing standards implement those policies only where reticulated services are available. Where they are not, the standards are silent, and a plan user reading the policy and the standard together is given no indication of how servicing is to be achieved. In my view, a note on each standard would close that gap. It would direct plan users to the regional plan and the Building Act 2004, which are the instruments that manage on-site servicing, without creating a further district consent requirement. This responds to the duplication concern raised by the section 42A officers, and supports the integrated management of servicing between the district and regional councils.

28. A note of this kind is not unfamiliar to the zone chapters. RLZ-S3 (Building coverage), for example, already uses a note to direct plan users to related requirements.

29. I recommend that the following note is added to GRZ-S11 and RLZ-S9:

Note: Where reticulated services are not available, stormwater and wastewater disposal for buildings may require consent under the relevant regional plan. Potable water supply is addressed through the Building Act 2004.

Section 32AA assessment:

30. The amendment is within the scope of CRC's submission points 271.548 and 271.640. It is a narrower form of the relief CRC sought, as it informs plan users of the existing regional and Building Act requirements rather than imposing a district standard. The note does not alter any activity status or create a consent requirement, so it imposes no additional cost. It improves the effectiveness of the standards in implementing RESZ-P2(9) and RLZ-P3(5), and improves the clarity of the PDP for plan users. I am satisfied it is the most appropriate in accordance with section 32AA of the Act.

DEFINITION OF CONSERVATION ACTIVITIES

Conservation activities (271.6)

31. CRC sought the deletion of the second sentence of the definition of "conservation activities", which includes ancillary activities such as access tracks, interpretative signs, visitor facilities and vehicle parking. CRC sought the deletion because conservation activities were permitted in the General Rural Zone (**GRUZ**), where access tracks, visitor facilities and parking could have significant effects. The GRUZ chapter has since been withdrawn.

32. The section 42A officer recommends rejecting the submission point. The officer considers that the notified wording identifies these activities as ancillary activities that must assist in enhancing the public's appreciation and recreational enjoyment of the conservation resource, and that their potential effects are managed through other provisions of the PDP (Open Space and Recreation Zones report, para 80). The officer

recommends replacing “access tracks” with “walking and cycling tracks” (para 82).

33. I accept the officer’s position in part. With the GRUZ withdrawn, conservation activities remain permitted in the PDP only in the Open Space Zone (OSZ-R4), the Sport and Active Recreation Zone (SARZ-R3) and the Macraes Mining Zone (SPZMM-R14). Replacing “access tracks” with “walking and cycling tracks” also narrows the example that carried the greatest potential for effects.

34. Walking and cycling tracks, interpretative signs and visitor facilities are small-scale activities that directly assist the public’s appreciation and recreational enjoyment of the conservation resource. They are anticipated in the open space and recreation zones, and CRC no longer seeks their deletion.

35. I consider vehicle parking is different in its effects. It can involve a large area of impervious surface, earthworks, stormwater runoff and vehicle movements, and it serves access to a site rather than appreciation of the resource itself.

36. Conservation activities are permitted in the OSZ and SARZ with no standards, and the PDP Earthworks chapter has been withdrawn except for EW-S1 (as it applies to the former GRUZ area) and EW-S5 to EW-S10. Earthworks for a car park ancillary to a conservation activity may therefore be managed only by the ODP.

37. In my Hearing 2 evidence I raised the need to establish how the PDP and ODP will be read together. Work on that relationship may clarify which ODP provisions are retained to manage these effects [XX: confirm the source, for example the coordinated right of reply on general PDP/ODP matters across Hearing Streams 2 to 5]. Until that is resolved, I recommend that “vehicle parking” is deleted from the examples in the definition, as follows:

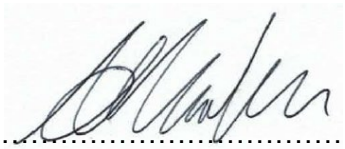
Conservation activities*: means the use of land and/or buildings for an activity undertaken for the purposes of maintaining, protecting and/or enhancing the natural, historic, cultural and/or ecological values of a natural or historic resource (for example; fencing and restoration planting). It includes ancillary activities which assist to enhance the public's*

appreciation and recreational enjoyment of the resource (for example; ~~access~~ walking and cycling tracks, interpretative signs~~,~~ and visitor facilities ~~and vehicle parking~~).

Section 32AA assessment:

38. The amendment is within the scope of CRC's submission point 271.6, as it is a narrower form of the deletion CRC sought. It improves the effectiveness of the definition by confining the ancillary activities to those that directly assist the public's appreciation and recreational enjoyment of the conservation resource. Vehicle parking would no longer be permitted as part of a conservation activity, and would instead be assessed under the zone provisions that otherwise apply [XX: confirm the activity status of vehicle parking in the OSZ and SARZ]. I am satisfied it is the most appropriate in accordance with section 32AA of the Act.

Dated this 3rd day of November 2026



……

Andrew Cameron Maclennan

Appendix 1: Canterbury Regional Council response to the recommendations in the Hearing Stream 4 section 42A reports

Note: This table lists only the CRC submission points that sought an amendment to a provision. It is not the full extent of CRC's submission. Submission points where CRC supported a provision, or recorded a neutral position, and the section 42A officer recommends retaining the provision, or an amendment that does not affect CRC's position, are not listed. CRC supports those recommendations for the reasons given in the section 42A reports.

Row number	CRC submission #	Relevant s42A paragraph and recommendation #	Recommendation	CRC response
GENERAL RESIDENTIAL ZONE (GRZ) – Residential Provisions s42A report				
1	271.548 GRZ-S11 Amend clause 1 as follows: "All new buildings must be connected to reticulated services where these are available. *Where reticulated services are unavailable, buildings must be provided with stormwater and wastewater systems, and potable water that meets regional council requirements*; and …"	Paras 483, 484, 490 to 494; recommendation at para 505	Reject	The s42A officer does not support the amendment because the urban areas where the GRZ applies are serviced by reticulated wastewater and water supply, unreticulated stormwater is managed through the Stormwater chapter, and the Subdivision chapter addresses sites where connections are unavailable (paras 490 to 493). The officer considers this approach gives effect to CRPS Policy 5.3.5 (para 493). I accept that reasoning. I consider SUB-S6 (Water supply), SUB-S7 (Wastewater disposal) and SUB-S8 (Stormwater management) are sufficient to ensure that new allotments are appropriately serviced. Where a reticulated connection is unavailable, these standards require a self-sufficient potable water supply of at least 10,000 litres, on-site wastewater disposal certified as achievable under the relevant regional plan (or a regional resource consent), and stormwater disposal to ground away from areas of instability or inundation. Where a dwelling is built on an existing lot without subdivision, servicing is managed through the Building Act 2004. Any discharge of wastewater or stormwater to land or water remains subject to the relevant regional plan. On that basis, I agree a standard requiring on-site servicing is not necessary in the GRZ. However, RESZ-P2(9), as recommended, seeks to ensure "all new buildings are appropriately serviced, including wastewater, stormwater and water supply with sufficient capacity for firefighting purposes and firefighting access". The officer records that clause 9 sets up the method of requiring servicing in

Row number	CRC submission #	Relevant s42A paragraph and recommendation #	Recommendation	CRC response
				GRZ-S11 (para 495). Consistent with my recommendation on RLZ-S9 (row 8), I recommend adding the following note to GRZ-S11: *Note: Where reticulated services are not available, stormwater and wastewater disposal for buildings may require consent under the relevant regional plan. Potable water supply is addressed through the Building Act 2004.*
RURAL LIFESTYLE ZONE (RLZ) – Rural Lifestyle Zone s42A report				
2	271.609 RLZ-P3 Add a new clause: "*5. requiring development to be adequately serviced for wastewater and stormwater collection, treatment and disposal.*"	Paras 74, 83; recommendation at para 87	Accept	Support, for the reasons given by the s42A officer. The recommended clause 5 uses the wording sought by CRC.
3	271.613 RLZ-R1 Amend RLZ-S9 as requested (271.640).	Not individually discussed. The related relief on RLZ-S9 is addressed at paras 136 and 155.	Reject	See row 8 below.
4	271.614 RLZ-R2 Amend the rule heading as follows: "RLZ-R2 Primary production (excluding mining activity, quarrying activities, *forestry activities*, and intensive outdoor primary production)"	Para 90; recommendation at paras 91 and 93	Accept	Support the recommended exclusion of forestry activities from RLZ-R2.
5	271.615 RLZ-R3	Paras 96, 97; recommendation at para 100	Accept	Support, for the reasons given by the s42A officer. The officer considers the amendment better gives effect to CRPS Policy 5.3.13 (para 101).

Row number	CRC submission #	Relevant s42A paragraph and recommendation #	Recommendation	CRC response
	Amend PER-1 to refer to any pest, pest agent, or organism of interest identified in the relevant Regional Pest Management Plan, and make non-compliance with PER-1 a prohibited activity (PRO-1).			
6	271.616 RLZ-R4 Amend RLZ-S9 as requested (271.640).	Not individually discussed. The related relief on RLZ-S9 is addressed at paras 136 and 155.	Reject	See row 8 below.
7	271.637 RLZ-S6 Define “road boundary setback” for frontage fencing within the Rural Lifestyle Zone.	Paras 134, 150; recommendation at para 159	Accept	Support, for the reasons given by the s42A officer.
8	271.640 RLZ-S9 Amend clause 1 as follows: "All new buildings must be connected to reticulated services where these are available. *Where reticulated services are unavailable, buildings must be provided with stormwater and wastewater systems, and potable water that meets regional council requirements*; and …"	Paras 136 and 155 (both of which refer to the CRC point as 271.639); the RLZ-S9 recommendation is at para 161	Reject	The s42A officer recommends rejecting the amendment because it would require a district consent where a regional consent is already required, duplicating functions (para 155). I agree that duplicating regional council functions is unnecessary and that the standard is not required. However, RLZ-P3(5), as recommended by the officer, requires "development to be adequately serviced for wastewater and stormwater collection, treatment and disposal" (para 87; see row 2). A note on RLZ-S9 would link that policy to the regional requirements without creating a further consent requirement. I therefore recommend adding the following note to RLZ-S9: *Note: Where reticulated services are not available, stormwater and wastewater disposal for buildings may require consent under the relevant regional plan. Potable water supply is addressed through the Building Act 2004*.

Row number	CRC submission #	Relevant s42A paragraph and recommendation #	Recommendation	CRC response
				RLZ-S3 (Building coverage) already uses a note to direct plan users to related requirements, so the approach is consistent with the RLZ chapter.
LOCAL CENTRE ZONE (LCZ) – Commercial Zones s42A report				
9	271.650 LCZ-R1 Amend LCZ-S12 as requested (271.674).	Para 113. The related relief on LCZ-S12 is addressed at para 139.	Reject	See row 11 below.
10	271.659 LCZ-R10 Amend PER-1 so that LCZ-S10 Hours of operation is no longer one of the standards that must be complied with.	Paras 118, 135; recommendation at paras 135 and 141	Accept	Support, for the reasons given by the s42A officer.
11	271.674 LCZ-S12 Amend clause 1 as follows: "All new buildings must be connected to reticulated services where these are available. *Where reticulated services are unavailable, buildings must be provided with stormwater and wastewater systems, and potable water that meets regional council requirements*; and …"	Paras 130, 139; recommendation at para 139	Reject	The s42A officer does not support the amendment because the LCZ applies to established urban centres that are anticipated to be serviced by reticulated infrastructure, and no circumstance has been identified that needs an on-site servicing pathway (para 139). I accept that reasoning. The LCZ applies to established urban centres that are anticipated to be serviced by reticulated infrastructure, so the circumstance CRC's amendment addresses is unlikely to arise. I agree that no change is required to LCZ-S12.
MIXED USE ZONE (MUZ) – Commercial Zones s42A report				

Row number	CRC submission #	Relevant s42A paragraph and recommendation #	Recommendation	CRC response
12	271.675 MUZ Introduction Insert a fifth paragraph into the introduction as follows: "*There is also Mixed Use Zone land at Ōmarama*"	Paras 147, 176; recommendation at para 192	Accept	Support, for the reasons given by the s42A officer.
13	271.690 MUZ-R1 Amend MUZ-S12 as requested (271.718).	Paras 160, 178. The related relief on MUZ-S12 is addressed at paras 190 and 191.	Reject	See row 14 below.
14	271.718 MUZ-S12 Amend clause 1 as follows: "All new buildings must be connected to reticulated services where these are available. *Where reticulated services are unavailable, buildings must be provided with stormwater and wastewater systems, and potable water that meets regional council requirements*; and …"	Paras 174, 188, 190, 197; recommendation at paras 191 and 194	Reject	The s42A officer does not support the amendment because the MUZ applies to areas serviced by reticulated infrastructure (paras 190 and 197). I accept that reasoning. The officer states that all Mixed Use Zone land identified in the PDP is serviced by reticulated infrastructure (para 197). As the MUZ is serviced by reticulated infrastructure, I agree that no change is required to MUZ-S12.
DEFINITIONS – Commercial Zones, Industrial Zones, Open Space and Recreation Zones, and Historic Heritage s42A reports				
15	271.6 Conservation activities Amend the definition by deleting the second sentence: "~~*It includes ancillary activities which assist to enhance the public's appreciation and*~~	Open Space and Recreation Zones s42A report: paras 75, 80; recommendation at paras 80 to 82	Reject	I accept the officer's position in part. The notified definition only includes these activities where they are ancillary and assist in enhancing the public's appreciation and recreational enjoyment of the conservation resource. With the General Rural Zone (GRUZ) withdrawn, conservation activities remain permitted in the PDP only in the Open Space Zone (OSZ-R4), the Sport and Active Recreation Zone (SARZ-R3) and the Macraes Mining Zone (SPZMM-R14).

Row number	CRC submission #	Relevant s42A paragraph and recommendation #	Recommendation	CRC response
	~~*recreational enjoyment of the resource (for example; access tracks, interpretative signs, visitor facilities and vehicle parking).*~~"			Replacing “access tracks” with “walking and cycling tracks” also narrows the example that carried the greatest potential for effects. Walking and cycling tracks, interpretative signs and visitor facilities are small-scale activities that directly assist the public’s appreciation and recreational enjoyment of the conservation resource. They are anticipated in the open space and recreation zones, and CRC no longer seeks their deletion. I consider vehicle parking is different in its effects. It can involve a large area of impervious surface, earthworks, stormwater runoff and vehicle movements, and it serves access to a site rather than appreciation of the resource itself. Conservation activities are permitted in the OSZ and SARZ with no standards, and the PDP Earthworks chapter has been withdrawn except for EW-S1 (as it applies to the former GRUZ area) and EW-S5 to EW-S10. Earthworks for a car park ancillary to a conservation activity may therefore be managed only by the ODP. The Council’s work integrating the PDP and ODP may clarify which ODP provisions are retained to manage these effects. Until that is resolved, I recommend deleting “vehicle parking” from the examples in the definition. This is a narrower form of the relief CRC sought, so it is within scope.