

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the hearing of a submission by Mark
Chrisp on the Proposed Waikato District
Plan

STATEMENT OF EVIDENCE OF MARK CHRISP

1. INTRODUCTION

- 1.1 My name is Mark Chrisp. I am a Director and a Principal Environmental Planner in the Hamilton Office of Mitchell Daysh Ltd, a company which commenced operations on 1 October 2016 following a merger of Mitchell Partnerships Ltd and Environmental Management Services Ltd (of which I was a founding Director when the company was established in 1994 and remained so until the merger in 2016). I am currently serving as the Chairman of the Board of Mitchell Daysh Ltd.
- 1.2 In addition to my professional practice, I am an Honorary Lecturer in the Department of Geography, Tourism and Environmental Planning at the University of Waikato. I am also the Chairman of the Environmental Planning Advisory Board at the University of Waikato, which assists the Environmental Planning Programme in the Faculty of Arts and Social Sciences in understanding the educational, professional and research needs of planners.
- 1.3 I have a Master of Social Sciences degree in Resources and Environmental Planning from the University of Waikato (conferred in 1990) and have 30 years' experience as a Resource Management Planning Consultant.
- 1.4 I am a member of the New Zealand Planning Institute, the New Zealand Geothermal Association, and the Resource Management Law Association.
- 1.5 I am a Certified Commissioner under the Ministry for the Environment's 'Making Good Decisions' course.

- 1.6 I have appeared as an Expert Planning Witness in numerous Council and Environment Court hearings, as well as several Boards of Inquiry (most recently as the Expert Planning Witness for the Hawke's Bay Regional Investment Company Ltd's proposed Ruataniwha Water Storage Scheme).
- 1.7 I have been involved in numerous district plan processes (reviews and plan changes), both as an author of such documents or assisting submitters.

Scope of Evidence

- 1.8 This statement of evidence focuses on the one matter that was the subject of my submission on the Proposed Waikato District Plan, namely the minimum lot size for subdivision in the Country Living Zone. Specifically, my evidence will cover:
- (a) The relief sought in the submission;
 - (b) The s.42A Report;
 - (c) The rationale for a 3,000m² minimum lot size;
 - (d) The analysis in the s.42a Report;
 - (e) The issues raised by the Hamilton City Council; and
 - (f) By way of a conclusion, why a 3,000m² minimum lot size is the most appropriate outcome in terms of the matters to be considered under s.32 of the RMA.

Code of Conduct

- 1.9 I confirm that I have read the Code of Conduct for Expert Witnesses 2014 contained in the Environment Court Practice Note and I agree to comply with it. My qualifications as an expert are set out above. I confirm that the issues addressed in this brief of evidence are within my area of expertise, except where I state that I am relying on what I have been told by another person. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.
- 1.10 I note, and need to declare, that I am an owner of a property in Country Living Zone at Tamahere, however, I have nothing to gain financially in relation to the relief sought in my submission. This is on the basis that while my property is 6,145m², the centrally located position of the 330m² house on the property along with a 100m² shed and swimming pool means that, if the relief sought in

my submission is granted, any further subdivision of my property would not be an economically or realistically achievable outcome. On the basis that I do not have a vested interest in the outcome, I consider that I am able to present evidence as an Expert Planner in an impartial and objective manner in accordance with the Code of Conduct.

2. RELIEF SOUGHT

2.1 I lodged a submission on the Proposed Waikato District Plan seeking the following relief:

“Amend Rule 23.4.2(a)(i) to provide for a net site area of at least 3,000m² for subdivision in the Country Living Zone.”

3. SECTION 42A REPORT

3.1 I have read the s.42A Report prepared by Ms Susan Chibnall in relation to the Country Living Zone. It helpfully includes the following series of maps (presented as Figure 1) showing the location of the areas zoned Country Living Zone in the Waikato District.

3.2 As can be seen from Figure 1, the Country Living Zone is variously located on the fringe of, or in close proximity to, urban centres. Substantial areas are located at Te Kauwhata and around Ngaruawahia and extending north towards Taupiri. Tamahere is the largest area of Country Living Zone in proximity to Hamilton City and, in contrast to other areas, is well established.

3.3 Section 8.5 of the s.42A Report discusses the submissions seeking changes to the minimum lot size in the Country Living Zone. The s.42A report recommends that the relief sought in my submission be rejected, whereby the current minimum lot size of 5,000m² is retained.

3.4 The reasons advanced by Ms Chibnall in support of her recommendation in relation to my submission are discussed later in my evidence.

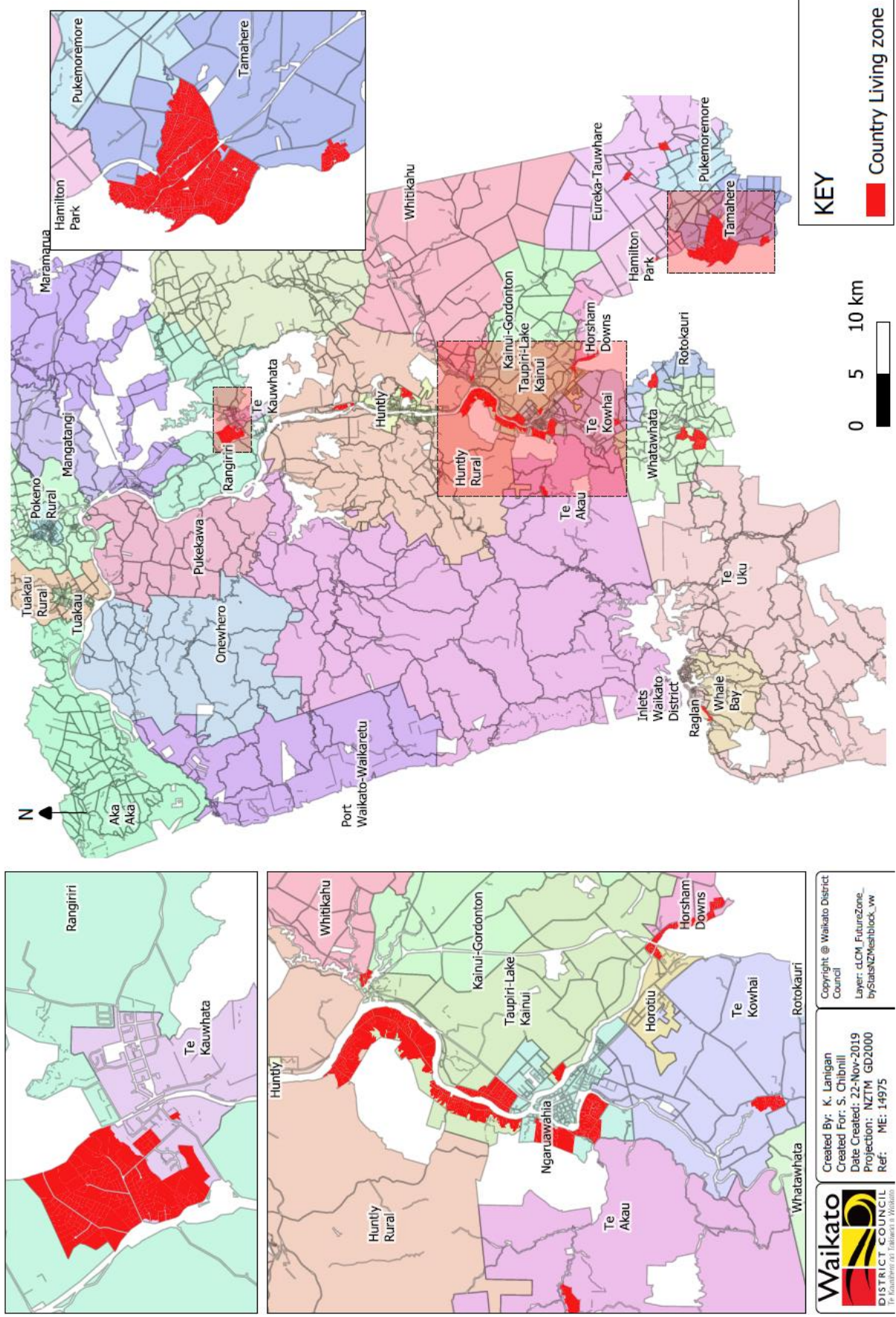


Figure 1 – Areas zoned Country Living Zone in the Waikato District

4. RATIONALE FOR A 3,000m² MINIMUM LOT SIZE

4.1 As a resident within the Country Living Zone (at Tamahere) for the last decade (and my knowledge of other areas zoned Country Living Zone in the Waikato District), I believe I have a good understanding of the land use pattern and the nature of land use activities that has resulted from the current minimum lot size of 5,000m². This section of my evidence discusses:

- The consequences of the current minimum lot size of 5,000m²;
- The benefits of the minimum lot size being reduced to 3,000m²; and
- Why a minimum lot size of less than 3,000m² is not appropriate.

Consequences of the Current Minimum Lot Size of 5,000m²

4.2 While the zone in question is called the 'Country Living Zone', it is, in reality, a Large Lot Residential Zone. Ms Chibnall¹ expresses an opinion that the Country Living Zone is most closely aligned to the Rural Lifestyle Zone in the National Planning Standards, which is described as follows:

“Areas used predominantly for a residential lifestyle within a rural environment on lots smaller than those of the General rural and Rural production zones, while still enabling primary production to occur.” (emphasis added)

4.3 As will be explained in more detail at the hearing (with the benefit of aerial photography and photographs taken at ground level), any notion that the Country Living Zone still enables primary production largely relates only to the land that has yet to be subdivided into large residential lots or is otherwise constrained in terms of its lot size by virtue of being located within the Airport Subdivision Control Boundary (i.e. where there are larger lots).

4.4 In any event, post subdivision, any rural production is at such a small scale as to be a negligible contribution to the character of the Country Living Zone or the economic prosperity of the rural economy. In fact, many of the subdivisions (including my own property) include covenants prohibiting the keeping of livestock or particular types of livestock). Other such covenants include clauses concerning noise, smell and controls on buildings and/or landscaping that further erode any opportunity for primary production. A drive around most parts of Tamahere will reveal very few instances of livestock or other 'rural production' activities and most of the fences are not stock-proof. The reality is that the vast majority of properties in the Country Living Zone do not undertake

¹ Para 43.

rural production activities. It is an environment that is dominated by large houses surrounded by large areas of mown lawn and perimeter plantings.

- 4.5 In my opinion, in terms of land use character, the Country Living Zone is more closely aligned with the Large Lot Residential Zone, described in the National Planning Standards as follows:

“Areas used predominantly for residential activities and buildings such as detached houses on lots larger than those of the Low density residential and General residential zones, and where there are particular landscape characteristics, physical limitations or other constraints to more intensive development.”

- 4.6 Ms Chibnall² refers to the absence of infrastructure, such as footpaths, street lights and reticulated water and wastewater, being a defining characteristic. By way of example, Tamahere has footpaths, a water supply (albeit only a trickle supply) and some street lighting.
- 4.7 The absence of a mains pressure water supply and sewage reticulation is the “physical limitation” constraining more intensive development (at least below 2,500m²)³ referred to in the description of Large Lot Residential Zone in the National Planning Standards.
- 4.8 While I accept there is a high level of residential amenity created, in my opinion, the current minimum lot size of 5,000m² results in a grossly inefficient use of land. Well over half of the land area of most of the subdivided lots within the Country Living Zone is lawn – usually mown with a ride-on lawnmower (or nowadays sometimes a robot lawnmower, because people do not want to spend hours mowing lawns)⁴. It is my opinion that a similar level of amenity is achievable with a minimum lot size of 3,000m² (bearing in mind that there will still be many lots that are larger than that, particularly in areas that have already been subdivided and developed).
- 4.9 With the rigidly applied minimum lot size of 5,000m², there is no variety of lot sizes available for people who want a larger (than standard urban sized) residential lot, but not of such a size (and cost) that is currently available to the market. There is a very limited opportunity for a 1,000m² lot (and an even lesser opportunity for a 3,000m² unsewered lot) in the two Village Zones in the Waikato District (located only at Tuakau and Te Kowhai). However, beyond Tuakau and Te Kowhai, there are no residential lots able to be created anywhere in the Waikato District of sizes between 3,000m² and 5,000m². This

² Para 44.

³ For reasons related to the management of sewage discussed later in my evidence.

⁴ For example, it takes over 1.5 hours to mow the lawns at my house with a ride-on lawnmower.

is the only range in lot sizes, that is not available to the market, yet (as will be explained below) is likely to best meet market demand for larger residential lots in the most efficient manner in terms of land utilisation.

Benefits of a Minimum Lot Size of 3,000m²

- 4.10 The proposed amendment to the minimum net site area of 3,000m² provides the opportunity to:
- Provide for a more efficient use of land in relation to any 'greenfield' subdivision (i.e. land that has not yet been subdivided for large lot residential purposes); and/or
 - Provide for a reconfiguration of existing lots where the boundaries of two or more existing lots could be reconfigured to create one or more additional lots (all of which would have a net site area of at least 3,000m²).
- 4.11 The second situation outlined above is likely to be a minor component of any future subdivision due to the manner in which established lots have been developed (discussed in more detail later in my evidence). The vast majority of new lots of a greater density would be associated with greenfield subdivision which would then create their own, slightly different, character compared to areas that have already been subdivided and developed.
- 4.12 The sort of activities that occur on lots within the Country Living Zone typically include one or more of the following:
- A house (usually of a larger than average size);
 - A driveway and vehicle parking areas (often sealed);
 - A swimming pool;
 - A tennis court;
 - Gardens; and
 - A large lawn typically mown with a ride-on lawnmower.
- 4.13 Even if a land owner wishes to undertake all of the activities listed above on their property in the Country Living Zone, they would easily be able to occur in a compliant manner (including in relation to setbacks) on a property of 3,000m² and still have a large area of lawn to mow. Note that there is no maximum lot size in the Country Living Zone (and no maximum proposed) so there will

always be a variety of lot sizes of 5,000m² or larger available to the market due to historical patterns of subdivision and development or new subdivisions that offer a variety of lot sizes.

- 4.14 A key benefit of the recommended 3,000m² minimum lot size is that it will result in a much more efficient utilisation of land (a natural resource). Section 7(b) of the RMA includes *“the efficient use and development of natural and physical resources”* as a matter that *“In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall have particular regard to”*. The current regime has resulted in a significant amount of idle land used for no productive purpose.
- 4.15 Furthermore, a more efficient use of land within the areas currently identified as Country Living Zone will reduce pressure on additional areas of productive Rural Zone land being used for large lot residential purposes in the future (i.e. the identified land resource for large lot residential purposes in the Country Living Zone will meet market demand for a longer period into the future) whilst also providing limited relief for greenfield urban expansion.

Why a Minimum Lot Size of less than 3,000m² is Not Appropriate

- 4.16 I agree with the s.42A Report to the extent that it concludes that a minimum lot size of less than 3,000m² is inappropriate (but I reach that conclusion for different reasons).
- 4.17 As far as I am aware, all of the land in the Country Living Zone is ‘unsewered’ (and will continue to be so), meaning that household sewage needs to be managed and disposed of by way of a septic tank and drainage field. Rule 3.5.7.4 of the Waikato Regional Plan requires an effective disposal area for any sewage treatment and disposal system of not less than 2,500m². This is one of the key reasons why a smaller lot size of less than 2,500m² (as sought by several other submitters) is not realistic and the 3,000m² minimum lot size that I have proposed provides a margin for error or buffer in this regard. I note that Waikato District Council has obviously accepted this logic in relation to unsewered lots in the Village Zone at Tuakau and Te Kowhai where a 3,000m² minimum lot size applies.⁵

⁵ Rule 24.4.2 of the PWDP provides for a minimum lot size of 1,000m² where a lot is connected to public water and wastewater infrastructure and 3,000m² where the lot is not connected to public water and wastewater infrastructure.

5. ANALYSIS IN THE S.42A REPORT

5.1 The analysis in the s.42A Report in relation to the minimum lot size commences with the following statement:

“In order to consider the most appropriate lot size for subdivision within the Country Living Zone, Council’s GIS has undertaken an analysis of the current lot sizes in this zone and the theoretical potential subdivision, given a range of minimum lot sizes.”

5.2 It appears from the above statement and the analysis that follows it, that the premise being advanced in the s.42A Report is that if there is an increase in the lot yield compared with the status quo, that must be a bad outcome. It is fairly obvious that any proposed reduction in the minimum lot size will result in a greater lot yield. As previously noted, this will mostly be the case in relation to greenfield land which has yet to be subdivided and will only include some limited amount of further subdivision of larger lots which have previously been subdivided.

Potential Lot Yield and Theoretical Additional Number of Lots

5.3 In her s.42A Report, Ms Chibnall states that there is a total of 2,442 existing titles within the various parts of the Waikato District zoned Country Living Zone.⁶ She then presents an analysis of the potential lot yield and theoretical additional number of lots at a range of different minimum lots sizes. Ms Chibnall’s analysis might be correct in relation to the prospect of a minimum lot size of 1,000m² or 2,000m² on the assumption that all existing lots are at least 5,000m² and are therefore ‘sub-dividable’.

5.4 However, Ms Chibnall’s analysis of potential lot yield and theoretical additional number of lots associated with a minimum lot size of 3,000m² (or larger) is incorrect. It is only the existing lots that are 6,000m² or larger which are potentially sub-dividable if a minimum lot size of 3,000m² is adopted.⁷ To get an accurate picture of the potential lot yield and theoretical additional number of lots, I have obtained the data used by Ms Chibnall from the Council’s GIS system.

⁶ Para 589.

⁷ It is also unclear how Ms Chibnall calculates a total of 1,404 “theoretical additional lots” if the status quo is maintained. Surely, there are no ‘additional’ lots beyond the potential lot yield under that scenario.

- 5.5 Of the 2,442 lots within the Country Living Zone, a total of 543 lots are 10,000m² or larger⁸, meaning that they can be subdivided under the status quo with a minimum lot size of 5,000m². Leaving aside any other constraints to subdivision⁹ (and taking into account the greater lot yield of any titles that are 15,000m² or larger), this results in a current potential lot yield of 2,106 additional lots across all the areas zoned Country Living Zone in the Waikato District under the status quo. Most of this subdivision potential relates to larger lots which have yet to be subdivided for large lot residential purposes.
- 5.6 Within the Hamilton Area of Interest¹⁰, there are 431 lots that are 10,000m² or larger¹¹ within the Country Living Zone. With a minimum lot size of 5,000m² (and taking into account the greater lot yield of any titles that are 15,000m² or larger) the current potential lot yield is 1,428 additional lots. Again, most of this subdivision potential relates to larger lots which have yet to be subdivided for large lot residential purposes.
- 5.7 Repeating the same analysis above with a minimum lot size of 3,000m², would mean that there is a current potential lot yield of 4,786 additional lots¹² across all the areas zoned Country Living Zone in the Waikato District and a potential lot yield of 3,454 additional lots¹³ within the Hamilton Area of Interest. These results are illustrated in the following graph (Figure 2).

⁸ Excluding such lots within the Urban Expansion Area and the Airport Subdivision Control Boundary – these lots have been excluded because subdivision is either a prohibited activity or, at best, a non-complying activity.

⁹ Such a shape factor, significant natural areas, or other topographical limitations.

¹⁰ Discussed in the evidence of Mr Luke O'Dwyer on behalf of HCC in Hearing Topic 3 – Strategic Objectives (including maps).

¹¹ Excluding such lots within the Urban Expansion Area and the Airport Subdivision Control Boundary – these lots have been excluded because subdivision is either a prohibited activity or, at best, a non-complying activity.

¹² Able to be subdivided from a total of 1,280 lots that are equal to or greater than 6,000m².

¹³ Able to be subdivided from a total of 1,079 lots that are equal to or greater than 6,000m².

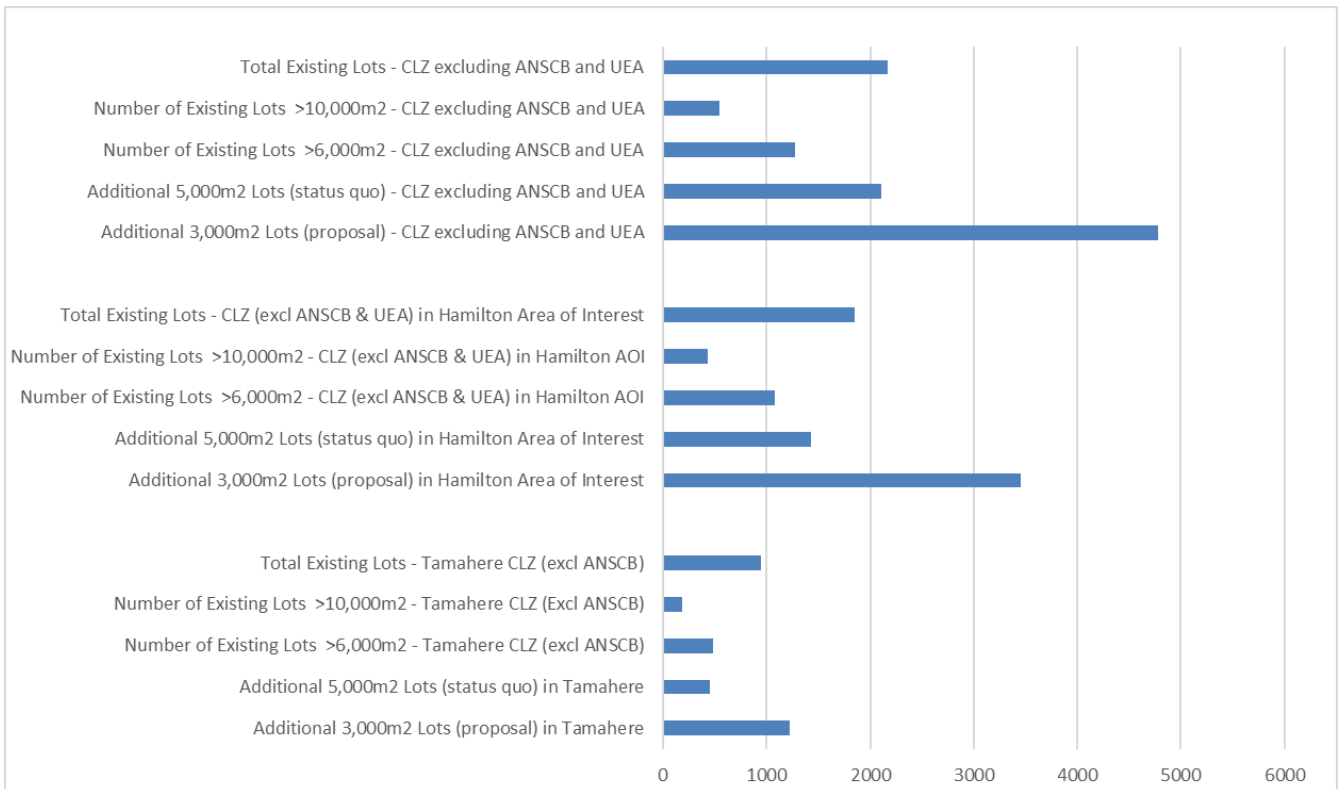


Figure 2 – Potential Lots Yields with 5,000m² and 3,000m² Minimum Lot Size

5.8 A reduction in the minimum net site area to 3,000m² will not result in the further subdivision of the vast majority of existing lots within the Country Living Zone that have already been subdivided for large lot residential purposes. This is because most of the existing lots that have already been subdivided are less than 6,000m² and would therefore be ineligible for further subdivision under the proposed amendment, except a few that could be created with neighbours.

5.9 The results presented above (particularly in relation to a minimum lot size of 3,000m²) are only a theoretical maximum in terms of lot yield. In reality, the actual lot yield will be much less. This is because many properties that are over 6,000m² have a substantial dwelling located in the middle of the property (like my own property) whereby it would be impossible to further subdivide without demolishing the existing dwelling and it would be uneconomic to do so. Furthermore, any subdivision activity will be limited by the ability of the market to accommodate new supply.

Character of the Country Living Zone

5.10 The s.42A Report states:

“The purpose of the Country Living Zone is to be a transition between urban and rural, but to have more of a rural character”¹⁴

- 5.11 Anyone taking a drive around the developed parts of the Country Living Zones (i.e. where they have already been subdivided in accordance with the current subdivision rules) will observe that the character of the area is far more residential (specifically large lot residential) than anything that can be described as rural in character. As previously discussed, the character of the Country Living Zone is characterised by a dominance of large houses surrounded by large lawns. It is just residential development at a much larger scale and separation, often of higher amenity. As the zone is subdivided and developed, most rural activities cease or only continue at a hobby scale of operation at most.¹⁵ We also now have urban speed limits on the roads in Tamahere (50 and 60km/h). I have often described Tamahere as the Beverley Flats of Hamilton (and I’m not sure that anyone would accurately describe Beverley Hills in California, which has much larger lots sizes, as being ‘rural’ in character).

Comparison with the Village Zone

- 5.12 Ms Chibnall seeks to ensure that there is a clear distinction between the nature (and associated subdivision standards) of the Village Zone and the Country Living Zone. As previously discussed, there are only two Village Zones in the Waikato District – at Te Kowhai and Tuakau. They provide the only two opportunities to have a lot size of between 1,000m² and 3,000m² in the Waikato District. They do nothing to satisfy the demand for larger lot residential lots between 3,000m² and 5,000m² elsewhere in the Waikato District. In my opinion, there is no planning rationale that says you cannot have two similar types of zone. Compare, for example, the subtle distinction between different residential zones in many urban areas (usually based on small differences in terms of density).

Objectives and Policies

- 5.13 Section 5.6 of the Proposed Waikato District Plan sets out the following objective and policies in relation to the Country Living Zone.

¹⁴ Para 596.

¹⁵ For example, I have four chickens on my property and my neighbour has three lamas (which are just pets).

5.6.1 Objective – Country Living Zone

- (a) Subdivision, use and development in the Country Living Zone maintains or enhances the character and amenity values of the zone.

5.6.2 Policy – Country Living character

- (a) Any building and activity within the Country Living Zone are designed, located, scaled and serviced in a manner that does not detract from the character of the area by:
 - (i) Maintaining the open space character;
 - (ii) Maintaining low density residential development;
 - (iii) Recognising the absence of Council wastewater services and lower levels of other infrastructure.
- (b) Maintain views and vistas of the rural hinterland beyond, including, where applicable, Waikato River, wetlands, lakes, and the coast.
- (c) Maintain a road pattern that follows the natural contour of the landform.
- (d) Ensures that the scale and design of any non-residential activities maintains the open rural character and addresses site specific issues such as on-site servicing, and transport related effects.
- (e) Requires activities within the Country Living Zone to be self-sufficient in the provision of water supply, wastewater and stormwater disposal, unless a reticulated supply is available.

5.6.3 Policy – Subdivision within the Country Living Zone

- (a) Subdivision, building and development within the Country Living Zone ensures that:
 - (i) The creation of undersized lots is avoided where character and amenity are compromised;
 - (ii) new lots are of a size and shape to enable sufficient building setbacks from any boundary;
 - (iii) building platforms are sited to maintain the character of the Country Living Zone and are appropriately-positioned to enable future development;
 - (iv) existing infrastructure is not compromised;
 - (v) existing lawfully-established activities are protected from reverse sensitivity effects.

- 5.14 All of the outcomes sought to be achieved in the objective and policies quoted above can easily be achieved with a minimum net site area of 3,000m². This is particularly the case whereby most of the new development at a greater density will occur in greenfield areas and will not alter the character of areas that have already been subdivided and developed. At this scale of subdivision and development, any difference in the character and amenity of lots between 3,000m² and 5,000m² will be minimal.

6. SUBMISSION BY HAMILTON CITY COUNCIL

- 6.1 HCC lodged a further submission in opposition to the relief sought in my submission (Ref: FI397.198). The following responds to the aspects of the evidence of Ms Laura Galt on behalf of HCC relating to the minimum lot size in the Country Living Zone. It also responds to various comments in the evidence of Mr Luke O'Dwyer on behalf of HCC¹⁶ (which is referred to in Ms Galt's evidence).
- 6.2 The evidence of Ms Galt¹⁷ states that "*allowing smaller lot sizes (3000m²) in the CLZ would significantly increase the capacity / number of lots provided by the CLZ*". There will be an increase in potential lot yield, which will result in a more efficient utilisation of the finite land resource (particularly for greenfield subdivision) which is in accordance with s.7(b) of the RMA. With a 3,000m² minimum lot size, the potential lot yield within the Hamilton Area of Interest is 3,454 lots spread over a range of areas (a large proportion of which will obtain goods and services from urban areas such as Huntly and Ngaruawahia which are closer than Hamilton). This compares with 1,428 additional lots that can be created within the Hamilton Area of Interest under the status quo (a difference of 2,026 lots).
- 6.3 If we look at Tamahere (which appears to be the area of greatest concern to HCC), 1,219 additional lots could be created with a minimum lot size of 3,000m², compared with 449 additional lots that can be created under the status quo (a difference of 770 lots).

Demand for Services

- 6.4 Ms Galt raises a concern¹⁸ about an increase in the demand for services associated with a reduction in the minimum lot size (and a corresponding

¹⁶ Presented in relation to Hearing Topic 3 – Strategic Objectives.

¹⁷ Para 67.

¹⁸ Para 68.

increase in the density of development) within the areas zoned Country Living Zone within the Hamilton Area of Interest. Specifically, she raises concerns about impacts on transport, three waters and social infrastructure. Ms Galt provides no evidence in support of her concerns about any increased demand for services (but includes a footnote cross-referencing the evidence of Mr O'Dwyer).

6.5 In relation to Tamahere, Mr O'Dwyer states¹⁹:

“The quantum and form of development of rural residential development within Tamahere has also created impacts on Hamilton’s infrastructure, namely hard infrastructure such as roads/water but also soft infrastructure such as libraries and schools. Importantly, the large expanses of lowdensity development, will undoubtedly make it impossible or very expensive to ever fully urbanise this area. Also providing urban standard infrastructure such as footpaths and cycleways, water supply, street lighting and roading is expensive for Council and/or residents alike.”

6.6 I do not understand why the potential effects raised by Mr O'Dwyer are of concern to HCC. Waikato District Council pays HCC for the ability for its ratepayers to use HCC public libraries. Everyone pays for tickets to go to theatres and shows irrespective of where they live. All New Zealand tax payers pay for schools, not just HCC residents. Any concerns about the provision of services within the Country Living Zone is an issue for the Waikato District Council and its ratepayers within the zone, not HCC.

6.7 The greatest potential for any increase in transport effects relates to the Tamahere Country Living Zone (being the largest area and close to Hamilton City). However, the impending opening of the Hamilton Section of the Waikato Expressway will create a lot of additional roading capacity within the southern parts of Hamilton City by significantly reducing the volume of traffic currently having to enter and exit the city via State Highway 1 through Hillcrest. Any additional volume of traffic from additional lots in Tamahere will be small in comparison.

6.8 I agree with Mr O'Dwyer where he states²⁰:

“Many of the existing interactions [between Hamilton City and the surrounding districts] are visible on a day-to-day basis as people commute to Hamilton from outside the city’s boundaries to work, study or shop. On the whole, these interactions are mutually beneficial to the City and to surrounding areas, particularly from an economic perspective.”

¹⁹ Para 47.

²⁰ Para 22.

6.9 As an example, the Skate Board Park at Tamahere is a 'destination' playground, including children coming from Hamilton City to use it (because it is so good). This illustrates that it is a case of swings and roundabouts when it comes to people in one district using the services of another.

6.10 Mr O'Dwyer states²¹:

"Future growth nodes will be in greenfield areas, including those on the edge of the City to help the sub-region accommodate projected growth, but also in and around existing towns. Such growth, will of course, need to be accompanied by significant areas of infill and increased densities to meet the requirements of the NPS-UDC, the Waikato Regional Policy Statement and the Future Proof Strategy."

6.11 In my opinion, the same imperatives about achieving greater densities to achieve a better utilisation of a finite land resource (without compromising the overall character of the Country Living Zone and recognising servicing constraints such as the absence of a mains pressure water supply and reticulated sewage) equally apply to the Country Living Zone.

6.12 Future Proof and the National Policy Statement for Urban Development Capacity include a focus on getting more out of what you have (i.e. increasing residential densities to achieve a more efficient utilisation of land).

7. CONCLUSION

7.1 The following sets out the key conclusions of my evidence with terminology relevant to the considerations under s.32 of the RMA underlined.

7.2 The proposed minimum lot size of 3,000m² will result in a much more efficient utilisation of the finite land resource in accordance with s.7(b) of the RMA compared with the status quo. It will also reduce pressure on additional areas of productive Rural Zone land being used for large lot residential purposes in the future.

7.3 The proposed minimum lot size of 3,000m² is an effective way of achieving desirable outcomes (including economic growth and employment) that are consistent with the objectives and policies relating to the Country Living Zone. There is no downside risk associated with the adoption of minimum lot size of 3,000m².

²¹ Para 44.

- 7.4 There will be little or no adverse effects on infrastructure or the demand for services within the Country Living Zone or elsewhere that cannot be foreseen, planned for, and resolved in a timely manner. The creation of additional lots will occur mostly in greenfield parts of the Country Living Zone over a period of many years in line with market demand.
- 7.5 In my opinion, the proposed minimum lot size of 3,000m² is the most appropriate way to achieve the relevant objectives of the Proposed Waikato District Plan and the purpose and principles of the RMA.

Mark Chrisp
23 March 2020