

**Before the Manawatū District Council  
Hearing Panel**

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In the matter of: **the Resource Management Act 1991**

And: **An application for subdivision and land  
use consents lodged by Clinton Brown**

For: **A 16-lot subdivision of land at 443  
Makino Road, Feilding**

MDC Reference SB9144 and LC9145

**Statement of Evidence of Christine Anne Foster  
Called by the Applicant**

**Dated 26 February 2020**

## INTRODUCTION

- 1 My name is Christine Anne Foster. I am a Planning Consultant and sole director of CF Consulting Services Limited, based in Wellington. I hold a Bachelor of Regional Planning and have worked as a resource management planner in New Zealand for over 35 years.
- 2 This statement of evidence is within my area of expertise as a resource management planner, except where I state that I rely on the evidence of others. I have read the Code of Conduct for Expert Witnesses set out in the 2014 Environment Court Practice Note (and, in particular section 7 in relation to an expert's duty to the Court). Whilst this hearing is not a hearing before the Court, I am aware of the obligations imposed on expert witnesses by the Code and agree to comply with the Code of Conduct. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.
- 3 My planning experience has included the compilation of resource consent applications, assessment of the environmental effects of a variety of projects and the drafting and implementation of resource management plan provisions. That experience has been gained in a number of roles including as a staff planner for local authorities, policy analyst with the Ministry for the Environment and, since 1992, as a consultant planner working on contract for a variety of clients including private land developers, territorial authorities, regional councils and central government departments. I have assisted local authorities with the preparation of district and regional plans under the Resource Management Act 1991 (*the RMA*) and with plan changes and variations. I am a qualified RMA decision-maker (with chairperson endorsement) under the 'Making Good Decisions' programme and have heard and determined a number of applications for consent and district plan changes.
- 4 I was asked by Greg Woollaston of Dewhirst Law (by email dated 8 February 2020), to provide a planning analysis of the application for consent. I was not part of the team of specialists who assisted Mr Brown develop the layout for his proposed subdivision (that team comprised Mr Pirie, Mr Hudson, Mr Barclay and Mr Clark). I have read

the application, the section 42A report and the supporting technical assessments on which it relies. I have also read the evidence of Messrs Brown, Pirie, Hudson, Barclay and Clark. I have viewed the site from Makino Road and visited the general Makino Road vicinity.

5 My statement of evidence canvases the relevant resource management planning framework for the Panel's determination of this application. My evaluation of the proposed subdivision, against that framework (detailed in the following paragraphs), concludes that:

(a) The District Plan clearly anticipates rural-residential style subdivision to a much closer density (in the words of the District Plan: 'down to around 4000m<sup>2</sup>') in the Feilding Rural Subdivision Node that overlays most of the application site; and

(b) The proposed subdivision density is anticipated by, and consistent with, the policy intention of the District Plan; and

(c) The rationale for the planning officer's determination of activity status is logical, although that appears to differ from the intended consent path signalled in Chapter 5 of the District Plan and differs from the applicant's understanding of how previous Council officers intended the rules should apply; and

(d) All potential adverse effects are able to be mitigated by works and design refinements, imposed as conditions of consent, such that net adverse effects will be minor or less than minor.

### **THE DISTRICT PLAN FRAMEWORK FOR SUBDIVISION**

6 I agree, broadly, with paragraph [99] of the section 42A report that the District Plan provides a clear and self-contained policy framework for determining this application. The District Plan provides a clear statement of the issues arising for subdivision within the district. It also provides a clear statement of intent as to the preferred location for close-density rural residential subdivision, the rate of land subdivision within the rural environment generally and how the potential adverse effects of land subdivision are to be managed. The District Plan framework is comprehensive and complete in this respect. Accordingly,

there should be no need for the Panel to invoke the guidance of Part 2 of the RMA in determining this application.

7 The District Plan framework expresses the community's preferred outcome for land subdivision in the Manawatū District, including in the Makino Road vicinity at the edge of urban Feilding. The District Plan framework is long-established (the Plan having been operative since 2002), although that also means that it is in need of review. I note that the Council has a programme for a 'rolling review' of the District Plan under way. However, that process has not advanced sufficiently to the point of superseding the long-established operative District Plan framework for managing rural subdivision.

8 The fragmentation of rural land is identified in Chapter 2 of the Plan as one of the District's significant resource management issues:

*The fragmentation of land holdings and new housing and other development which results from subdivision is having a cumulative impact upon the rural environment, including upon its rural character and amenities and upon the future options for use of the vulnerable versatile land. While each proposal may have minor effects on its own, the cumulative effects over time can be very significant.*

9 The Plan's strategy for responding to that significant issue is set out in Chapter 5. Broadly, it involves:

(a) Minimising the area of versatile soils converted, by subdivision, to residential use (Objective S1 and its Policies (a) and (b));

(b) Ensuring that new allotments have building sites that maintain separation distances between dwellings and nearby activities (Objective S2 and its Policies (a) and (b));

(c) Maintaining a landscape differentiation between urban and rural areas (Objective S3 and its Policies (a) and (b));

(d) Controlling the rate at which new allotments are created from titles within the Rural 2 Zone (the average lot size required for subdivision in the Rural 2 Zone is 4ha);

(e) Identifying 'Rural Subdivision Nodes' on the outskirts of Feilding and other townships as a transition between the urban and rural environments, where small-lot subdivision is already a feature and where additional small-lot subdivision ('down to 4000m<sup>2</sup>) can be accommodated without eroding the supply of versatile soils (Objective S3 and its Policy (b)); and

(f) Ensuring new rural allotments are self-sufficient for water and waste disposal and appropriately manage stormwater drainage (Objective S4 and its Policies (b), (c), (d) and (e), Objective S5 and its Policy (b)).

10 For the purposes of Objective S1, the District's versatile soils are those classified Class I and II and these are captured within the Rural 1 zoning (the darker green shading on the planning maps).

11 The Rural 2 Zone (lighter green) is assigned to less versatile land. The applicant's site is entirely within the Rural 2 Zone (comprising the less versatile soils). However, most of the applicant's site is also within the Feilding 'Rural Subdivision Node' identified in Appendix 5A. The District Plan intention is that these 'Rural Subdivision Nodes' will create the peri-urban area of transition (the line of differentiation) between urban and rural. This is explained on page 5 of Chapter 5 as follows:

*Elements of urban character already exist around some rural focal points and around the edge of certain townships, where the need to retain "ruralness" is less important. These rural focal points are Colyton, Hiwinui, Taikorea, Glen Oroua, Rangiwahia, Utuwai, Waituna West and Pohangina. The townships concerned are Apiti, Feilding, Rongotea, Bunnythorpe, Cheltenham, Sanson, Kimbolton, and Halcombe. Council will consider small lot subdivision (i.e. minimum lot size of around 4000m<sup>2</sup>) in these localities as a discretionary activity. What is appropriate for these places, however, is a low-density rural settlement rather than a fully-fledged township.*

12 The 'focal points referred to have translated into the 'Rural Subdivision Nodes' or 'Nodal Areas' defined in the District Plan as:

*'any land within the Feilding, Rangiwahia or Hiwinui subdivision nodes identified in Appendix 5A and any land within 1 km of any of the following places:*

Colyton School, Taikorea Hall, Glen Oroua School, Apiti Village Zone, Utuwai School, Pohangina Hall, Rongotea Village Zone, Cheltenham Village Zone, Sanson Village Zone, Kimbolton Village Zone, Waituna West School.

- 13 The smaller, 1km radius, nodal areas are not identified on the planning maps or on mapped Appendices. What is notable is that there are multiple such nodes (all of the small townships plus the northern and western outskirts of Feilding) and that the density anticipated for these areas is low-density rural *settlement*. The Plan identifies these areas as something different from the surrounding Rural 2 and Rural 1 zoned land. They have a particular function in defining the area of transition from urban to rural. They are not to be urban (e.g. subdivided to urban residential density) and they are not intended to be rural or to have large-lot rural character.
- 14 The explanation to Objective S3 and its policies is utterly clear: subdivision of multiple allotments as small as 4000m<sup>2</sup> is intended in this location (and on this land). This outcome is part of the deliberate strategy of this District Plan to provide for small-lot rural-residential subdivision in appropriate locations.
- 15 The applicant's site is located at the edge of, but mostly (80% of it is) within the Feilding Rural Subdivision Node as shown in the following Figure 1:



**Figure 1 Brown Property Within Rural Subdivision Node**

(reproduction of Figure 2 from Hudson Associates February 2016  
Landscape Assessment)

- 16 Whilst not all of the applicant's land is within the Feilding Rural Subdivision Node, it cannot be said that a proposal for subdivision of the land into allotments each having area larger than 4000m<sup>2</sup> is inconsistent with the District Plan's Chapter 5 Strategy. In principle, the creation of multiple allotments that have area larger than the 4000m<sup>2</sup> minimum indicated in Chapter 5, is entirely consistent with (indeed, gives effect to) the deliberate District Plan intention for the Feilding Rural Subdivision Node. Noting that proposed Lot 16 comprises 5.66 ha, and that much of it is contained within the Feilding Rural Subdivision Node, it could be said that the proposed subdivision is less intensive (overall) than anticipated by the District Plan.

#### **ACTIVITY STATUS**

- 17 I included in paragraph 11 above an excerpt from Chapter 5 of the District Plan that explains the Council's strategy for small-lot subdivision in the rural environment. The explanation explicitly states that small-lot subdivision within the 'nodal areas' will be considered as a discretionary activity and the relevant rule (Chapter C, 1.3.1 (A) ((ii)) does indeed provide for small-lot subdivision as a discretionary activity:

**Rule C 1.3 DISCRETIONARY ACTIVITIES**

**1.3.1 Specification of Activities**

A) *The following subdivision shall be discretionary activities:*

i. ....

ii. *Any Rural Zone or Flood Channel zone subdivision which does not meet the controls in Rule C2 2.4, on land within a **nodal area**, but only if the allotments being created do not have frontage to an arterial route (Appendix 3B.1).*

iii. ...

- 18 The proposed subdivision does not meet the Rule C2 2.4 standards (for minimum allotment area applicable in the Rural 2 Zone or for vehicle access). Makino Road is not identified as an arterial route. However, the land is not entirely 'within' the Feilding Rural Subdivision Node. I accept the logic of the section 42A report that, therefore, the proposed subdivision is not completely captured by Rule C1 1.3.1 and must follow the rule cascade to the next default rule. There is no default rule within Chapter C1. The only available default rule is Rule A2 2.1 which is a Plan-wide catch-all default and states:

*Any subdivision or land use activity which is not categorised by this Plan as being a permitted, controlled, discretionary, restricted discretionary, or prohibited activity shall be a non-complying activity.*

- 19 Mr Pirie's evidence is that the authors of the District Plan did not intend that subdivision of land not wholly contained within a 'nodal area' should default to non-complying activity status. The evidence of Mr Pirie and Mr Brown is also that Council officers have previously told them that the subdivision of this land would be treated as a discretionary activity. The intention is clearly stated in the Chapter 5 explanation to treat 'nodal area' subdivision as a discretionary activity. The difficulty is that the boundary of the 'nodal area', at least in this case, does not follow the land's title boundary and the Plan rules are

not explicit about how land that is *partially* within the 'nodal area' is to be treated.

- 20 My own view is that it is of no moment whether this particular subdivision proposal is considered as a non-complying activity or a discretionary activity. That is because the policy framework so clearly anticipates small-lot subdivision of at least the density proposed and, in this respect, the proposal can only be seen as entirely consistent with the District Plan's objectives and policies. Also, that against this policy context, the creation of small allotments from the parts of the site that are not within the 'nodal area' cannot be said to create adverse effects on amenity values or rural character any greater than does the subdivision of the 'nodal area' itself. Again, in this respect and especially where the proposal is less intensive than signalled for 'nodal areas', the proposal can be seen as not inconsistent with the District Plan policy framework. Also, that the potential adverse environmental effects of the proposal can be mitigated by works or design refinements such that net adverse effects will be no more than minor. Accordingly, the proposed subdivision meets both 'limbs' of section 104D of the RMA and qualifies for consideration on its merits against the relevant policy framework. I expand on these findings in the following paragraphs.

#### **BASELINE FOR EVALUATION**

- 21 I agree with the position stated in the section 42A report that, for this District Plan where no subdivision to create additional allotments can proceed without consent, there is no 'permitted baseline' in the sense that expression is used in section 104 (2) of the RMA. I take a different approach from the section 42A assessment, however, in relation to defining the relevant environmental baseline for consideration of this proposal on its merits.
- 22 At paragraph [41] of the report, under the heading 'Rural Character', Ms Grinlinton-Hancock states that the environment in which the proposed subdivision is located is '*inherently rural in character*'. I do not consider that is an accurate depiction of the 'environment' for the purposes of assessing this application. The 'environment' is not frozen in time, such that existing characteristics and settlement density alone

provide the benchmark for assessment. The 'environment' (and effects on this environment) must consider the reasonably foreseeable future state of this environment, as intended by the District Plan. As explained above, the District Plan intends that a large area of land to the south and west of the site will be subdivided and become settled as an area of low-density rural settlement (that is, settled for rural-residential living). The District Plan goes further and indicates that low density rural settlement means small-lot subdivision down to 4000m<sup>2</sup>.

23 While the existing character of the wider area is rural (in the traditional large-lot sense), this is not the sole determinant of what the intended character of this locality is. The clear District Plan intention is that the character of this locality (as experienced from within the 'nodal area' and from beyond – from the adjoining properties) will change to become low-density rural settlement characterised by small-lot (4000m<sup>2</sup> minimum) subdivision. In this respect, the correct lens for assessment of this proposal is one where:

(a) Change from traditional rural character to low density rural residential settlement is intended;

(b) The change intended by the District Plan is profound – from large-lot rural to small-lot rural settlement;

(c) The function of the 'nodal area' is to create a new transitional area of low-density settlement between the urban and rural zones; and

(d) Future rural amenity in this locality will be changed by the addition of buildings, water tanks, people, vehicle movements, closer proximity of buildings and fences and a pattern of land fragmentation that does not currently exist.

24 Opposition to the proposed subdivision on the basis that it will increase subdivision density or will introduce additional dwellings and presence of people in close proximity to existing properties cannot be sustained, here, where the District plan intends exactly these outcomes for this locality. The hearing of this application is not (or should not be) an opportunity to relitigate the existence of the Feilding Rural Subdivision

Node. It exists, it defines the lawful scope of development and it underpins the assessment framework.

25 The presence of the 'Rural Subdivision Node' on the Makino Road outskirts of Feilding must be known to all of the submitters (all of whom have either owned and lived on their properties since before the operative date of the District Plan or have purchased their land or subdivided their land since the operative date recently). All but two of the submitters' properties were created since the 'nodal area' provisions applied or, even, using the 'nodal area' provisions. In this sense, submitters occupying these allotments have come to the 'nodal area'. This hearing is not an opportunity to now fetter the implementation of the District Plan's 'nodal area' by others.

26 I do not consider that the presence of the Feilding Rural Subdivision Node, or the on-the-ground consequences that flow from that, have been given appropriate weight in the section 42A report. At paragraph [45] of the report, for example, weight is given to the fact that the proposed development is *of a density that is greater than what has been developed to date* in the Nodal Area (as one of the bases for recommending against a grant of consent). Similarly, at paragraph [54] the Ms Grinlinton-Hancock expresses concern that the proposal *suggests a higher density than what has occurred nearby*. I can find no reference in the District Policy framework that gives weight to historical subdivision densities. The correct lens for the Panel's assessment, in my view, is that the District Plan framework clearly signals and facilitates change from historical subdivision densities – to small-lot rural settlement explicitly on the applicant's site.

#### **REVERSE SENSITIVITY**

27 Concerns about the potential for reverse sensitivity are given some attention in the section 42A report. The expression 'reverse sensitivity' is defined in the District Plan as (inserted by Plan Change 52):

*'the potential for the operation of an existing lawfully established activity to be constrained or curtailed by the more recent establishment of other activities, which are sensitive to the adverse environmental effects being generated by the pre-existing activity.'*

- 28 The potential for reverse sensitivity may exist anywhere a new boundary is created between a Rural Zone and a transitional zone of settlement. To the extent that any potential reverse sensitivity exists anywhere along the interface between the 'nodal area' and the Rural Zone, this is a consequence of the 'nodal zone' itself. It does not appear to have been a reason for rejecting locations, such as this one, for the 'nodal zone' identification. It should not, therefore, be relied on as a reason for rejecting the proposed subdivision in this situation. In the context of this particular rural locality, my own view is that the potential for reverse sensitivity has been overstated. The area is characterised by pastoral and arable farming and cropping. It is not, by contrast, a wine growing area with frost fans or a dairying stronghold with attendant effluent management and ensilage odours. If reverse sensitivity is a 'king hit' issue in this locality, it must similarly be an issue along the entire 'nodal area' boundary. No specific guidance is provided in the District Plan rural policy framework about how reverse sensitivity is to be avoided. If the Plan intended that it should be a determining factor in the grant or decline of consent at the interface of an identified 'nodal area', it should have said so. It doesn't.
- 29 I understand that the applicant has offered a reverse sensitivity covenant, under which the adverse effects of reasonable and compliant existing rural uses can not form a basis for complaint for purchasers of lots in the proposed subdivision. Such a covenant, if imposed, may well fully mitigate this concern.

### **VERSATILE SOILS**

- 30 The section 42A report finds that the proposal is contrary to District Plan Objective S1 (which seeks to protect the life-supporting capacity of, particularly, the District's versatile Class I and II land). That conclusion ignores the reality that all of the land within the identified 'nodal areas' is made available (by the Plan) for small-lot settlement, with an indicative minimum allotment size of 4000m<sup>2</sup>. Some loss of potential for agricultural production is inherent in any policy framework that enables subdivision and occupation for rural (residential) settlement. To invoke that as a basis for declining consent to subdivision within and closely contiguous to an identified 'nodal area'

does not make sense. None of the land within the site is identified by the District Plan as being 'versatile' or warranting particular protection due to its productive potential. In fact, quite the opposite – given the 'nodal area' identification.

## **ENVIRONMENTAL EFFECTS**

- 31 **Amenity Values:** Mr Hudson's opinion, qualified by specialist assessment, is that the proposed subdivision will have no more than minor adverse effect on the amenity values of this rural locality. My view, explained in preceding paragraphs, is that the proposal is entirely consistent with the intended small-lot rural settlement character of this locality. The section 42A report's conclusions about rural character and rural amenity are not supported by any qualified specialist assessment. Also, as I discuss earlier, the benchmark for assessment adopted in the section 42A report is, in my opinion, incorrect.
- 32 **Traffic Generation:** The relevant experts (Mr Connelly and Mr Barclay) agree that traffic generated by the proposed subdivision can be readily accommodated within the local roading network.
- 33 **Safe Vehicle Access:** Mr Barclay's assessment and evidence support the standard of vehicle access proposed. Mr Connelly advocates for a higher (road) standard. Even if the Panel prefers Mr Connelly's advice on particular aspects of access design, these can be addressed by design refinements and conditions of consent. It would be unreasonable to rely on these concerns as grounds for refusing consent. They are capable of being mitigated.
- 34 **Wastewater:** There is no dispute between the Council's advisers and the applicant's advisers that appropriate provision can be made for self-contained on-site wastewater systems and the allotments are sized to comply with the regional minimum site area of 5000m<sup>2</sup> to facilitate this.
- 35 **Stormwater Drainage:** Mr Clark's view is that the method of stormwater collection and drainage proposed by the applicant will address all known inundation hazard and accommodate hydraulic neutrality. Mr Adams would prefer a different design. The Panel will form its own view of which specialist view it prefers. Whichever opinion

the Panel prefers, the details can be addressed in conditions of consent. It is notable that Mr Clark's recommended stormwater management design, involving a sizeable detention pond, will result in net benefit in terms of detaining and reducing stormwater flows to downstream waterways and properties in all storm events. This feature of the proposal does not appear to be acknowledged in the section 42A report.

36 **Earthworks:** The section 42A report suggests there is some difficulty in respect of how earthworks will be managed. It is not uncommon for a land developer to not know, at the time of applying for or the hearing for consent, precisely what volume of earthworks will be generated by a proposed development. The application signals the intention in broad terms. The proposed subdivision is small in scale and my view is that all necessary requirements to appropriately manage earthworks activities (including for erosion and sediment control and hazard management) can be specified in conditions of consent. This is not unusual.

37 Accordingly, there is no basis for finding that residual adverse effects cannot be mitigated or will be more than minor. All potential adverse effects can be addressed by appropriate conditions of consent. If more time is required to settle on an agreed appropriate set of conditions than the tight timeframe of a hearing day will allow, it is not uncommon to allow the parties a further opportunity to 'thrash out' appropriate conditions. The Hearing Panel will be familiar with this process. In this case, it would be assisted by the Panel providing an indication on its preference on the substantive issues (for example, in relation to road and stormwater design) to guide the relevant experts' thinking about conditions.

### **MATTERS RAISED IN SUBMISSIONS**

38 I do not propose to step through the matters raised in submissions point by point. The summary of primary issues contained in the table in paragraph 32 of Ms Grinlinton-Hancock's report is, in my view, accurate. I have addressed all of the points raised there in the foregoing sections. In summary, I conclude that all concerns raised are

either at odds with the clear policy intention for this locality or can be mitigated and addressed by conditions of consent.

#### **MATTERS FOR CONSIDERATION UNDER SECTIONS 104 & 104D**

39 The Panel will be well familiar with the threshold tests of section 104D of the RMA that apply to non-complying activities - that:

*(1) Despite any decision made for the purpose of notification in relation to adverse effects, a consent authority may grant a resource consent for a non-complying activity only if it is satisfied that either—*

*(a) the adverse effects of the activity on the environment (other than any effect to which section 104(3)(a)(ii) applies) will be minor; **or***

*(b) the application is for an activity that will not be contrary to the objectives and policies of....the relevant plan....*

40 I come to a different conclusion than Ms Grinlinton-Hancock. I find that the proposal is entirely consistent with (not contrary to) the clear policy framework of the District Plan for small-lot subdivision in this locality and, specifically, on this site. My opinion is also that none of the potential adverse effects identified by Ms Grinlinton-Hancock is of such significance that they place the proposal at odds with ('contrary to') the relevant District Plan objectives and policies. All potential residual adverse effects on the environment is capable of being mitigated and addressed by conditions of consent.

41 For these reasons, I find that even if the application is considered as a non-complying activity and not as a discretionary activity (as suggested by the wording of Chapter 5), there is no section 104D bar to it being considered on its merits in terms of the relevant matters set out in section 104.

42 The relevant s. 104 matters are that:

*1) When considering an application for a resource consent and any submissions received, the consent authority must, subject to Part 2, have regard to—*

*(a) any actual and potential effects on the environment of allowing the activity; and*

*(ab) any measure proposed or agreed to by the applicant for the purpose of ensuring positive effects on the environment to*

*offset or compensate for any adverse effects on the environment that will or may result from allowing the activity; and*

*(b) any relevant provisions of—*

*(i) a national environmental standard:*

*(ii) other regulations:*

*(iii) a national policy statement:*

*(iv) a New Zealand coastal policy statement:*

*(v) a regional policy statement or proposed regional policy statement:*

*(vi) a plan or proposed plan; and*

*(c) any other matter the consent authority considers relevant and reasonably necessary to determine the application.*

43 Ms Grinlinton-Hancock has identified the only relevant planning instruments:

- the operative District Plan,
- the NES for Managing Contaminants in Soil to Protect Human Health,
- the One Plan Regional Policy Statement and Regional Plan provisions.

44 I agree with Ms Grinlinton-Hancock's conclusion that the proposal does not raise any issues in terms of the NES or the One Plan. I do not agree with Ms Grinlinton-Hancock's conclusions that the proposed subdivision conflicts with or is inconsistent with the relevant objectives and policies of the District Plan set out in the table after paragraph [92] of the section 42A report. In particular, I do not agree with her commentary or conclusions in respect of Chapter B3 Rural Objectives LU7, LU8, LU10, LU11, Noise 3C Objective 1, Earthworks 3D Objectives 1 and 2, Subdivision (Chapter 5) Objectives S1, S2, S3, S4, S5, S6 and S7 and their derivative policies listed in the table. My reasons for drawing fundamentally different conclusions about these objectives and policies are explained in the foregoing sections.

## **CONCLUSION**

- 45 My overall conclusion is that it is open to the Panel to find, on the evidence presented to date, that this proposed subdivision qualifies for a grant of consent (subject to conditions to address residual adverse effects). The proposal meets the threshold tests of section 104D of the RMA. The proposed subdivision either gives effect to or is consistent with the relevant objectives and policies of the operative District Plan and of other higher order planning instruments. All residual adverse environmental effects are capable of being addressed by appropriate conditions of consent.
- 46 A decision granting consent (subject to appropriate conditions) will better meet the sustainable management purpose of the Act, given the clear and highly directive policy framework of the District Plan which supports small-lot subdivision and development for rural settlement of the 'nodal areas'.

Christine Foster

26 February 2020