

9 May 2022

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Christchurch City Council submission on the Private Plan Change 82 Request to rezone land from Rural Outer Plains to Living MD Zone and Business 1 at the corner of Dunns Crossing Road and Brookside Road, Rolleston.

Introduction

1. Christchurch City Council (the Council) thanks Selwyn District Council for the opportunity to submit on the Private Plan Change Request (Plan Change 82) at the Corner of Dunns Crossing Road and Brookside Road, Rolleston. The request seeks to rezone 110 hectares of land from Rural Inner Plains Zone to predominately Living MD Zone and with a small Business 1 Zone.

Summary

2. Our Submission addresses:
 - a) The NPS UD requirement for significant development capacity and a well-functioning urban environment.
 - b) Relationship with the Canterbury Regional Policy Statement (CRPS)
3. Christchurch City Council (thereafter referred to as “Council”) is supportive of growth in the towns in Selwyn District to support the local needs. Council has and continues to be supportive of the work that Selwyn District Council has undertaken in conjunction with the other Greater Christchurch Partners to provide for a compact and sustainable urban form. However the area sought by Plan Change 82 for rezoning is outside of the areas identified for development in the CRPS and *Our Space 2018-2038: Greater Christchurch Settlement Pattern Update - Whakahāngai O Te Hōrapa Nohoanga* (Our Space), The CRPS seeks that urban development is avoided in this area.
4. The Plan Change is not consistent with Policy 8 of the NPS UD as the proposal will not add significant development capacity or contribute to a well-functioning urban environment. Thus Plan Change 82 does not give effect to the CRPS or the NPS UD and in our view must be declined.

National Policy Statement on Urban Development 2020 (NPS UD)

5. Policy 8 of the NPS UD anticipates that:

Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is:

- (a) unanticipated by RMA (Resource Management Act 1991) planning documents; or*
- (b) out-of-sequence with planned land release.*

6. The proposal is not anticipated by RMA planning documents as the site is located outside the projected infrastructure boundary identified on Map A of the Canterbury Regional Policy Statement (CRPS) and has not been included as a future development area in Change 1 to the CRPS.
7. Policy 8 of the NPS UD sets out two tests for unanticipated or out-of-sequence development. These tests are that:
 - a. The plan change will provide significant development capacity; and
 - b. The plan change will contribute to a well-functioning urban environment.
8. Based on the wording of Policy 8 which includes the word ‘and’, the direction outlined above needs to achieve both tests. When both tests are met, the Council is to be responsive to such plan changes.
9. The first limb of satisfying Policy 8 is the scale of the proposed development provided, being to provide significant development capacity. The significance of the development capacity provided needs to be determined in conjunction with understanding the needs of the local community that it is intended to support. The proposed plan change would result in approximately 1320 lots across the 110ha site, this would account for around 10% of current stock in Rolleston.
10. The Greater Christchurch Housing Development Capacity Assessment, dated 30 July 2021¹ identified a surplus of 1,864 houses in the short-term (2021 – 2024) and a shortfall of 2,089 houses in the medium term (2021 – 2031). Since the capacity assessment was completed, private plan changes have been approved in Selwyn District for an additional 1606 houses. Thus, the proposed plan change does not satisfy the first limb of Policy 8.
11. The second limb of Policy 8 is that the out-of-sequence development will contribute to a well-functioning urban environment. Policy 1 of the NPS UD notes the following indicators of a well-functioning urban environment at a minimum:
 - a) Have or enable a variety of homes that:
 - i. Meet the needs. In terms of type, price, and location, of different households; and
 - ii. Enable Maori to express their cultural traditions and norms; and
 - b) Have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and
 - c) Have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and
 - d) Support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and
 - e) Support reductions in greenhouse gas emissions; and

¹ <https://www.greaterchristchurch.org.nz/assets/Documents/greaterchristchurch/Capacity-Assessment-reports-2021/Greater-Christchurch-Housing-Development-Capacity-Assessment-July-2021.pdf>

12. It is important to note that Policy 1 is a minimum of what constitutes a well-functioning urban environment insofar that other factors influence what is deemed to be a well-functioning urban environment.
13. The Council considers the plan change request would compromise the intentionally planned urban environment envisioned in Chapter 6 and Map A of the CRPS. The CRPS considers the specific needs of the Greater Christchurch sub-region, enables long term planning and funding for strategic, network and social infrastructure to accompany growth. The proposal does not support an integrated approach to development insofar that it is outside the projected infrastructure boundary and would require the extension of infrastructure to an area otherwise not planned for. Therefore, the plan change request would not contribute to a well-functioning urban environment.
14. As the proposed plan change site has not been identified as a Future Development Area, it is important to consider infrastructure and the downstream effects on the Greater Christchurch transport network. Appropriate transport infrastructure is fundamental to ensuring a well-connected urban environment and good accessibility for all people. Without a funded and established public transport network to service the site, it is likely that this development will impact on the ability of the Council to manage the downstream transport network.
15. The proposed National Policy Statement for Highly Productive Land (pNPS-HPL) identifies Fragmentation of our productive land as a national resource management issue which needs to be addressed to enable the availability of highly productive land for primary production now and for future generations. Productive land in the Canterbury region holds substantial value as it contributes to the sustainability of the region through providing land on which locally grown and sourced produce can be farmed appropriately. This then reduces the transport costs associated with the distribution of food to the Christchurch City and provides for a variety of land uses in the surrounding region. The Council considers that a detailed assessment of how the proposed plan change would impact the enduring economic and natural resource value of versatile soils is required.
16. The Council considers that the proposed plan change does not satisfy both limbs of Policy 8 of the NPS UD, and thus cannot be considered appropriate out-of-sequence development.

Relationship with the Canterbury Regional Policy Statement

17. As mentioned before urban development in the area proposed by Plan Change 81 is not anticipated by the CRPS. In fact the CRPS seeks that urban development is avoided in this area:

Objective 6.2.1: Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that:3. Avoids urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS;

18. Under the RMA, district plans are required to give effect to any national policy statement and regional policy statement. If a proposed change to a district plan will, if accepted, fail to give effect to a regional policy statement, then a change should be sought to the RPS either in advance or at the same time.
19. Based on our review of the Plan Change 81 documentation, we understand that there has not been an accompanying change sought or proposed to the CRPS that would rectify any inconsistency or conflict with Objective 6.2.1 of the CRPS. Thus Plan Change 81 does not give effect to the CRPS and in our view must be declined.

20. Relief Sought

That unless the concerns outlined above are addressed, the plan change is refused.

Thank you for the opportunity to provide this submission.

For any clarification on points within this submission please contact Kirk Lightbody, Policy Planner, at kirk.lightbody@ccc.govt.nz

Yours faithfully

Jane Davis

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