



Submission on “PART A” of the Intensification Planning Instrument (IPI) – Variation 1 to the Proposed Selwyn District Plan

Clause 6 of the First Schedule, Resource Management Act 1991

The submission period for “PART A” of the Intensification Planning Instrument (IPI) – Variation 1 to the Proposed District Plan closes at
5pm Friday 16 September 2022.

Your submission (or part of your submission) may be struck out if the Council is satisfied that at least one of the following applies to the submission (or part of the submission):

- It is frivolous or vexatious.
- It discloses no reasonable or relevant case.
- It would be an abuse of the hearing process to allow the submission (or the part) to be taken further.
- It contains offensive language.
- It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient knowledge or skill to give expert advice on the matter.

1. Submitter Details

Please note: all fields marked with an asterisk (*) are compulsory.

Submitter name
 Submitter address
 City/Town Postcode

Is the contact different to the submitter?
 If no, skip to contact email

No

Contact name
 Contact organisation
 Contact address
 City/Town
 Contact email Postcode
 Contact phone number

Please note that by making a submission, the content of your submission (including your personal information) will be made publicly available (including online) in accordance with the Resource Management Act 1991. Please contact us at privacy@selwyn.govt.nz or on 0800 735 996 if you think certain information in your submission should not be publicly available. For our management of personal information, please see our full Privacy Policy at www.selwyn.govt.nz/privacy.

2. Trade Competition Declaration

I could gain advantage in trade competition through this submission.

No

If yes: I am directly affected by an effect of the subject matter of the submission that
 (a) adversely affects the environment; and
 (b) does not relate to trade competition or the effects of trade competition.

3. Hearing Options

Do you wish to be heard in support of your submission?
 If you choose yes, you can choose not to speak when the hearing date is advertised.

Yes

If others are making a similar submission would you consider presenting a joint case with them at the hearing? You can change your mind once the hearing has been advertised.

Yes

4. Submission Details

Before the Selwyn District Council

in the matter of: **Variation 1 to the Proposed District Plan**

Submission of Kathleen Liberty (Submitter V1-0050)

Dated: 16 September 2022

The Medium Density regulations that apply to Lincoln were derived from data from the 2018 Census, by Statistics New Zealand Functional Urban Area designation of Lincoln as a “Satellite Urban Area.”

Key Point 1: Discretion by SDC is possible.

West Melton was also included in this definition (see Figure 1, appended), but SDC has decided NOT TO APPLY the Medium Density Rules to West Melton because its population is less than 5,000. This theoretically shows that it is possible to exclude Lincoln from these medium-density rules, dependent on how the population of an area is defined. The 2018 Census actually divides Lincoln into two separate areas: Lincoln East and Lincoln West. If this designation was consistently used by SDC, the medium density rules would not apply, because neither area has more than 5,000 population.

Key Point 2: Incomplete and out-of-date data from 2018 Census was used to designate Lincoln as a “Satellite Urban Area.”

Lincoln was included as Satellite Urban Area (commuter city) for a Tier 1 Functional Urban area (Christchurch) by Statistics New Zealand, and this was based on people commuting into Christchurch city for work in 2018, according to the 2018 census.ⁱ This census was the first totally ‘digital’ census, and has been described as a ‘debacle’, with perhaps as much as 10% of the population totally missed.ⁱⁱ and, one in 7 who did participate failed to complete the census form.ⁱⁱⁱ

The classification of a “functional urban area” was based on: “Functional urban areas therefore consist of a densely inhabited city and a less densely populated commuting zone whose labour market is highly integrated with the city’.

The 2018 Census data that was used to classify Lincoln as a Satellite Urban Area was based on approximately 928 people of working age who drove private cars to work from Lincoln East, and about 711 people who drove cars to work from Lincoln West in 2018 (see Table 1, appended).

Designation of Lincoln as a Satellite Urban Area was a purely a statistical operation, based on flawed data, which did not take into account the quality of the land, or the existing density, or the quality of the neighborhoods or whether or not there was a housing shortage forecast for the future to 2050. – (Selwyn District Council Lead Planner Tim Hill said at a public meeting at the Lincoln Event Centre on 26.08.2022 that there was now no housing shortage at present or forecast for Selwyn District after the last few years of planning consents).

These data are surely incomplete and out-of-date, following the many changes in work patterns during the pandemic. At the very least, the data used to derive these important classifications needs to be remediated to be based on much higher quality data.

Key Point 3: One-Size-Fits-All Does Not Fit Lincoln

For purposes of the medium density planning, legislation and implementation— the statistical definitions were just dumped on a roading map--this was totally a ONE SIZE-FITS-All smash and grab ram raid.

This was purely a statistical operation, based on flawed data, which did not take into account the quality of the land, or the existing density, or the quality of the neighborhoods or whether or not there was a housing shortage forecast for the future to 2050. – (Selwyn District Council Lead Planner Tim Hill said at a public meeting about meat the Lincoln Event Centre on 26.08.2022 that there was now no housing shortage at present or forecast for Selwyn District after the last few years of planning consents).

Although appeal to the Environment Court may not be made, it is possible to appeal to the High Court, according to the SDC's own website.

🔗 Can I appeal the Council decision on the variation to the Proposed District Plan?

No, there is no ability to appeal the Council's decision on the variation to the Environment Court. An appeal may be made to the High Court on a point of law.

Recommendation: SDC join with Christchurch City Council to appeal the Medium Density Rules to the High Court

Figure 1 Statistics New Zealand Classification of areas with commuting workers within Selwyn District as part of Christchurch Metropolitan Area (source: Statistics New Zealand (10.02.2021). Function Urban Areas, Methodology and Classification. Appendix 2: <https://www.stats.govt.nz/methods/functional-urban-areas-methodology-and-classification/>).

Appendix 2: Functional urban area components and 2018 usually resident population

FUA type	Functional urban area name (also urban core)	Secondary urban cores	Satellite urban areas	2018 Census usually resident population				
				Urban core	Secondary urban cores	Satellite urban areas	Hinterland	Functional urban area
Metropolitan area	Auckland	Hibiscus Coast, Pukekohe	Beachlands-Pine Harbour, Clarks Beach, Helensville, Kumeu-Huapai, Maraetai, Muriwai, Parakai, Patumāhoe, Pōkeno, Riverhead, Tuakau, Waimauku, Waiuku	1,346,091	77,484	40,620	83,424	1,547,619
	Christchurch	Kaipoi, Rangiora, Rolleston	Diamond Harbour, Leeston, Lincoln, Lyttelton, Pegasus, Prebbleton, West Melton, Woodend	358,062	47,223	25,218	40,311	470,814
	Dunedin	Mosgiel	Brighton, Waikouaiti	99,885	13,632	2,667	8,823	125,007

Table 1 Estimation of Number of Individuals and Percent of Population used to designate Lincoln as a Satellite Urban Area qualifying for Medium Density Housing Rules.

The process of classification in the definition of Function Urban Areas was based on the 2018 Census Data on the working age population. In the absence of other information and for purposes of this estimation, the 2018 Census data was used to exclude the percent of the population that was under 15 or over 65 to estimate “working age”.

The Census uses the following categories for transportation to work:

driving a private vehicle; driving a company vehicle; using a bus; riding a bike; walking/jogging; working at home; (also ferry, train, other).

For purposes of this estimation, I used “driving a private vehicle” for commuting to work, although this may be of questionable accuracy.

In the table, census data is shown in plain text and my calculations are shown in italics.

2018 Census Data	Lincoln East	Lincoln West
Male population	1740	1428
% aged 16-64	63%	67.5%
<i>Total number of males aged 16-64</i>	<i>1096</i>	<i>964</i>
Employed full time*	54.8%	40.7%
Employed part time*	13.9%	18.1%
% Employed	68.7%	58.1%
<i>Total number employed</i>	<i>753</i>	<i>560</i>
Travel to work by personal car	62.5%	61.7%
<i>Employed men = Total travel to work by car</i>	<i>471</i>	<i>346</i>
Female population	1830	1515
% aged 16-64	61.2%	69.7%
<i>Total number of females aged 16-64</i>	<i>1120</i>	<i>1056</i>
Employed full time*	54.8%	40.7%
Employed part time*	13.9%	18.1%
% Employed	68.7%	58.1%
<i>Total number employed</i>	<i>769</i>	<i>614</i>
Travel to work by personal car	59.5%	59.5%
<i>Employed women = Total travel to work by car</i>	<i>457</i>	<i>365</i>
Total population		
males	1740	1428
females	1120	1515
Census total	2860	2943
Total driving personal cars to work		
Males	471	346
Females	457	365
Total	928	711
% of population on which satellite commuter area designation was based:	32%	24%

* not separated by gender in statistical data

Sources for Table 1

Statistics from 2018 Census Data (use webpage menu on left side for category designations):

Lincoln East : <https://www.stats.govt.nz/tools/2018-census-place-summaries/lincoln-east#work-income-and-unpaid-activities>

Lincoln West : <https://www.stats.govt.nz/tools/2018-census-place-summaries/lincoln-west#work-income-and-unpaid-activities>

End Notes

ⁱ Statistics New Zealand (10.02.2021). Functional Urban Areas, Methodology and Classification. <https://www.stats.govt.nz/methods/functional-urban-areas-methodology-and-classification/>

ⁱⁱ Bryce Edwards (6.03.2019). 'The absolute debacle of the 2018 Census' *Political Roundup, New Zealand Herald*. <https://www.nzherald.co.nz/nz/political-roundup-the-absolute-debacle-of-the-2018-census/2ERWBW5ZOWR45OFM3Z56L4WMX4/>

ⁱⁱⁱ Bryce Edwards, (16.04.2019). Statistics NZ and a census failure of 'epic proportions'. *Political Roundup, New Zealand Herald*. <https://www.nzherald.co.nz/nz/political-roundup-statistics-nz-and-a-census-failure-of-epic-proportions/7ATKW7BPTM2JDORT5MHBQ6RYCQ/>