

**From:** [PART A Variation 1 to the PDP](#)  
**To:** [grahamjsearle@yahoo.co.nz](mailto:grahamjsearle@yahoo.co.nz)  
**Cc:** [DPR Submissions](#)  
**Subject:** Copy of your submission on Variation 1 to the Proposed District Plan  
**Date:** Friday, 16 September 2022 2:46:11 pm

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#### Trade Competition Declaration

**I could gain an 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 effects the environment; and**

**(b) does not relate to trade competition or the effects of trade competition.**

#### 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?**

Yes

#### Point 1

Provisions to which my/our submission relates:

My position on this provisions is:

Oppose

The reasons for my/our submission are:

Prebbleton does not meet the definition of a Relevant Residential Zone according to the Resource

## Management (Enabling Housing Supply and Other Matters) Amendment Act 2021.

- It clearly fails the first test as it did not have a population exceeding 5,000 as at the 2018 Census.
  1. Importantly, the Act does not give leeway to ignore this test if the population grows past 5,000 after 2018 (otherwise the limit has no meaning as it could always be exceeded at some point if there was positive growth and sufficient time).
  2. So I believe it is incorrect for the Selwyn District Council report 'Proposed Selwyn District Plan Variation In Response To The Resource Management (Enabling Housing Supply And Other Matters) Amendment Act' dated 11/2/2022 ('June 22 Internal Paper') to argue that it is necessary to include Prebbleton now as this will only pre-empt work required in future.
  
- It also fails the second test that it is an Urban Environment as defined by the Amendment Act
  1. To meet this definition, Prebbleton must be predominantly urban, and 'is, or is intended by the specified territorial authority to be, part of a housing and labour market of at least 10,000 people' (Amendment Act, 77F (b)).
  2. I could find no clear definition for a housing and labour market. To understand the context for how Prebbleton is integrated into the surrounding environment, I looked at the following Council documents:
    1. The Proposed District Plan: it describes an Activity Centre Network that lists Prebbleton as a Service Activity Centre (along with West Melton). It lists examples of activities as 'Provide goods and services to residents of the town as well as the wider rural area.' This doesn't sound like a housing and labour market requiring 10,000 people.
    2. The Proposed District Plan: It describes a Township Network that lists Prebbleton as a Service Township (along With West Melton, Darfield and Leeston). 'Function is based on providing a high amenity residential environment and primary services to Rural Townships and surrounding rural area'. Providing services to rural townships (in Prebbleton's case Tai Tapu) doesn't sound like it requires a labour market of 10,000 people.
    3. The Density and Typology Report 7 June 2018, prepared as a Baseline Assessment Report for the Proposed District Plan. In paragraph 6.4.3 it forecasts Prebbleton's population in 2043 at 6,145 (referenced to the Selwyn Long Term Plan 2018). Approximately 20% of this population are shown as over 65, ie unlikely to be in the labour market unless they are struggling to pay their local body rates!
    4. The Prebbleton Structure Plan 2010. This refers to Prebbleton as a 'village' 37 times. This doesn't sound like Selwyn District Council intended Prebbleton being part of an urban environment with a

housing and labour market of 10,000 people at this time. For comparison, this is bigger than the June 2021 population estimate for Te Puke, Huntly, Morrinsville, Greymouth and Motueka, and just smaller than Hawera or Wanaka (citypopulation.de, Stats NZ). As nice as these locations are, I hope Prebbleton doesn't grow to this size any time soon.

5. The Prebbleton Structure Plan 2010 :  
Listed in Section 8 key issues like 'Maintaining Village Character', and 'Separation Form Christchurch'.

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So the 'Housing and Labour Market' definition would need to extend beyond the boundaries of Prebbleton to exceed 10,000 people. In this case, other towns in the SDC should be defined as

Relevant Residential Zones if this approach underpins how we define access to housing and labour markets. West Melton would be caught by this approach

1. The June 22 Internal Paper excluded West Melton as it argued Prebbleton was more applicable on various criteria (distance to Christchurch, proportion of 'large lot' residences, public transport routes)
2. I'm puzzled why the paper argued 'which township was more applicable', rather than applied the Amendment Act definition, ie predominantly urban and part of a housing and labour market exceeding 10,000 people.
3. I don not accept the SDC needed to make a 'Which one, and only one, shall we include?' decision
4. And I do not agree the proportion of large lots or public transport routes necessarily defines or excludes access to a housing or labour market, or that the distance to Christchurch is a requirement (ie why does a 13 minute car ride from West Melton to Rolleston exclude West Melton from the Rolleston labour force?)

- In summary, I do not agree that Prebbleton is caught by the Amendment Act definitions, and for this reason it should be excluded as a Relevant Residential Zones

- In the event SDC thinks it has discretion to include Prebbleton, I do not agree this is consistent with the Prebbleton Structure Plan, or the proposed District Plan, specifically

1. SD -DI - 01 : 'takes into account the character of individual communities'
2. SD -DI - 05 : in accordance with their anticipated role within the Activity Centre Network

The decision I/we want Council to make:

Amended to remove Prebbleton