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Selwyn District Council  
Freepost 104 653,  
PO Box 90  
ROLLESTON 7643

Email: [submissions@selwyn.govt.nz](mailto:submissions@selwyn.govt.nz)

**Christchurch City Council submission on the Private Plan Change 71 Request to rezone 53 hectares of current rural land in East Rolleston to residential land**

**Introduction**

1. Christchurch City Council (the Council) thanks Selwyn District Council for the opportunity to provide comment on the Application for Private Plan change 71. The request seeks to rezone approximately 53 hectares of land, which would result in the ability to provide for up to 660 residential allotments.

**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)
  - c. The potential wider transport effects on Christchurch City; and
  - d. Residential density.
  - e. Social and Affordable Housing
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 on urban form and anticipated density for development opportunities to provide for a compact and sustainable urban form. However part of the area sought by Plan Change 71 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)*. *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. In our view re-zoning of the part of Plan Change 71 outside the areas identified for development in the CRPS must be refused, as it does not give effect to the CRPS.

**National Policy Statement on Urban Development 2020 (NPS UD)**

4. The direction in the National Policy Statement on Urban Development (NPS-UD) is for good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport and to support reductions in greenhouse gas emissions.

5. Policy 8 of the NPS UD provides for:  
*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 partially located outside the greenfield priority areas 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.
 Based on the wording of Policy 8 which includes the word 'and', the direction outlined above needs to achieve both tests.
  
8. The scale for determining the significance of the development capacity provided is an important consideration. The Council considers that the assumption that 660 houses within the Greater Christchurch Partnership sub-region constitutes significant development capacity needs to be further supported by evidence, which has not been included with the plan change material as the plan change focuses on Rolleston and the Selwyn District only. The capacity needs to be considered in the context of the Greater Christchurch 86,600 dwelling long term housing target that is required under the NPS UD to meet demand. 660 houses is only a small fraction (less than 1%) of that housing target.
  
9. Development beyond the greenfield priority areas and the future development areas in Map A exceeds the amount of housing and business capacity required to meet medium and long term targets, identified in *Our Space 2018–2048 Greater Christchurch Settlement Pattern Update Whakahāngai O Te Hōrapa Nohoanga* and expressed in the CRPS. Thus additional capacity is in excess of what is needed. Development in these areas is not meeting a capacity shortfall, but rather could delay other growth and urban regeneration areas identified in *Our Space* (and where infrastructure, and the public transport system, has been already built to served) from being developed and regenerated.
  
10. A more constructive approach would be to use the guidance material provided by the Ministry of the Environment and the direction outlined in the CRPS to interpret significance. While the term 'well-functioning urban environment' is new to the NPS UD, the overall direction in the RMA outlining how the Greater Christchurch sub-region should grow has been implemented through Chapter 6 of the CRPS. This direction includes where development is best located within the Greater Christchurch sub-region and the density which development should achieve. While it is important to assess the plan change as unanticipated, the rationale for why development was directed to particular areas in the CRPS is relevant for determining the appropriateness of the proposal.

***Relationship with the Canterbury Regional Policy Statement***

11. As mentioned before urban development in part of the area proposed by Plan Change 71 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;*

12. 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.
13. Based on our review of the Plan Change 71 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 71 does not give effect to the CRPS and in our view must be declined.

### **Wider transport effects on Christchurch City**

14. Action 9b of *Our Space 2018-2048 (Greater Christchurch Settlement Pattern Update - Whakahāngai O Te Hōrapa Nohoanga)* states that:

Selwyn and Waimakariri District Councils are required “to undertake structure planning (**including the consideration of development infrastructure and the downstream effects on the Greater Christchurch transport network**) and review of District Plans over the next year for the identified Future Development Areas in the 2019 Canterbury Regional Policy Statement (CRPS) Change set out in Action 9a” (*Our Space*, Page 41 – emphasis added).

15. On Table 4 of the Integrated Transport Assessment shows that the vast majority (79%) of commute for work trips from Rolleston North East are to Christchurch. On page 13 at paragraph 67 it states that “*the location site is not likely to noticeably alter the commute period flows to and from Christchurch beyond that anticipated from growth in Rolleston generally*”. Then at paragraph 69 it states “*for these reasons, no further analysis for the wider road network has been undertaken*”. However part of the plan change is for residential development beyond the infrastructure boundary in the CRPS and thus this has not been anticipated, and thus analysis should be provided.
16. The proposal relies on a future public transport network which has not been planned or funded to provide connections. The plan change site is over 400m from the nearest bus stop at its nearest point, and over 2km at its furthest point. A distance that could discourage public transport use.
17. The application does not address the difference between accessibility through public or active transport, and car based connections to employment. The location of the site does not provide sufficient local employment to meet the needs for the potential residents, and the travel times to reach major employment hubs such as the Christchurch city centre would take approximately 30 minutes via car and approximately 60 - 80 minutes via bus. The inclusion in the request that it is possible to provide public transport does not address this disparity and promotes the reliance on car based transport. Council is unclear how this will achieve a reduction in greenhouse gas emissions, which is a requirement in the definition for a well-functioning urban environment in the NPS-UD.

18. An increase in commuter traffic into Christchurch City, means more people making more trips. The result will be increased emissions, congestion and longer journey times.
19. Reducing private motor vehicle dependency is important for improving sustainability by reducing emissions and the significant adverse effects of downstream traffic within Christchurch City. The Council seeks an urban form and development controls to ensure a funded and implemented public transport system to service the site, including connections to Christchurch City, prior to any residential development.

### **Density**

20. The Council seeks a higher minimum density requirement of 15 households/hectare. Increased densities would better achieve efficiencies in coordination of land use and infrastructure, support mixed land use activities, support multi-modal transport systems and protect the productive rural land resource. Action 3 of *Our Space 2018-2048 (Greater Christchurch Settlement Pattern Update - Whakahāngai O Te Hōrapa Nohoanga)* was to undertake an evaluation of the appropriateness of existing minimum densities. In response to this the Greater Christchurch Partnership has commissioned a technical report on density to achieve the agreed actions in Our Space. This report has concluded that 15 households per hectare is the ideal minimum level of density in the Greater Christchurch area. Council seeks that a minimum density requirement of 15 households/hectare, and the recommendations of the report, when it is finalised, are included in the plan change.

### **Social and Affordable Housing**

21. The Greater Christchurch Partnership are working together on developing a Social and Affordable Housing Action Plan. The Council request that the relevant recommendations of the Social and Affordable Housing Action Plan be incorporated in the Plan Change.

### **Relief Sought**

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

Thank you for the opportunity to provide this submission.

No Council cannot gain an advantage in trade competition through this submission;

Yes Council would like to be heard with regards to this submission (we may revise this position once all submissions and further submissions have been reviewed);

Yes Council would consider presenting a joint case with any submitters who raised similar points.

For any clarification on points within this submission please contact David Falconer, Team Leader City Planning, at david.falconer@ccc.govt.nz

Yours faithfully



Jane Davis  
**General Manager - Infrastructure, Planning and Regulatory Services**