BEFORE THE SELWYN DISTRICT COUNCIL

Under	the Resource Management Act 1991
In the matter of	Proposed Plan Change 72 to the Operative Selwyn District Plan: Prebbleton
And	Trices Road Rezoning Group (The Applicant)

SUMMARY OF EVIDENCE OF PAULINE FIONA ASTON

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INTRODUCTION

1 My full name is Pauline Fiona Aston. My qualifications and experience are set out in my main evidence.

KEY POINTS OUTLINED IN EVIDENCE

2 Private Plan 72 (PC72) as amended in response to submissions proposes to rezone approximately 28.7 hectares of land ("the Site") in Prebbleton to Living Z, to accommodate around 320+ dwellings.

3 The Site is identified as a preferred rural residential site (Prebbleton Area 8) in the Selwyn Rural Residential Strategy 2014 (RRS 2014); and with an Urban Growth Overlay for rural residential development in the Proposed Selwyn District Plan (PSDP). However, the more recent proposal and now development of the Birchs Road Park adjoining to the south has significantly changed the 'urban suitability' of the Site. It has become the most suitable location for Prebbleton to grow into, in order to close the gap between the township and the new park.

4 PC72 is well located in terms of the planning framework (at the national, regional and district level) to provide for further urban growth of Prebbleton. Development of the Site will achieve a compact, and efficient, urban form with excellent connectivity by multiple transport modes to Prebbleton's centre, recreation areas and neighbhouring Key Activity Centres, as well as bridging the existing urban area to Birchs Road Park to the south. It can be serviced for three waters and any environmental effects of the development can be avoided or mitigated, including by the provisions of the proposed Outline Development Plan.

5 The PC72 process is part of a fluid statutory planning environment where a mix of old and outdated documents, other planning processes that are underway, and recent and proposed new legislation can cloud the decision making process. In my opinion, the greatest weight should be placed on the current statuory planning framework newest and higher order planning document, the NPS-UD, when assessing the merits of PC72. PC72 is consistent and gives effect to all of the relevant NPS-UD objectives and policies.

6 Development of the Site for housing will support a competitive land and development market (Objective 2). There is an urgent need to rezone more land for urban residential purposes in Selwyn, including Prebbleton, to help address the current housing supply crisis which has resulted in recent price escalation; and to meet the Council's obligations under the NPS-UD to provide at least sufficient capacity to meet the expected demand for new dwellings.

7 The PC72 site is and is close to major employment areas, including Key Activity Centres at Rolleston, Lincoln, the south west Christchurch industrial/business growth area (Hornby and Halswell) as well as the Central City. It is close to/already on, and well serviced by, public and active transport routes, which can be extended over time into the Site (Objective 3).

8 PC72 can be effectively integrated with the planning and funding of existing water, wastewater, reserves and other infrastructure (power and phone). There is sufficient existing capacity for the enabled development and no upgrades are required. (Objective 6)

9 The NPS-UD (Objective 6) requires a balance between strategic medium/long term decision making and being responsive to proposals, particularly those that supply significant development capacity and promote well- functioning urban environments. The NPS-UD requires the Council to be responsive to all proposals, not just those that supply significant capacity. To be responsive is to *'react quickly and in a positive way'*.

10 PC72 will help address both short and medium term capacity land supply constraints and will not, in my opinion, compromise potential outcomes from the Greater Christchurch Spatial Plan 2050 process which will be implemented through the CRPS review in 2024.

11 The proposed residential development in this location will contribute toward an urban form which supports reductions in greenhouse emissions (relative to other potential growth areas) and be resilient to the effects of climate change (Objective 8).

12 Policy 8 of the NPS-UD provides an alternative resource management framework that prevents decision makers from being able to consider meritorious proposals that are outside of areas identified in Map A of Chapter 6 of the CRPS. The proposal meets both NPS-UD Policy 8 requirements for unanticipated (in RMA documents) development. It will add significantly to additional development capacity at a Prebbleton and Selwyn District scale; and will contribute to well-functioning urban environments. I agree with the Reporting Officer that it is not appropriate to consider PC72's contribution to additional development capacity at a Greater Christchurch scale because this *"would create a bar that is implausibly high, such that the pathway provided by Policy could never be used, which is clearly not the intent of the national direction"* [1]

13 PC72 is consistent with the Operative Selwyn District Plan (OSDP) objectives and policies, including growth related ones for Selwyn townships generally, and Prebbleton specifically and those of the CRPS - except those which restrict urban development to Map A greenfield priority and FDAs.

14 All matters raised in submissions have been addressed in evidence. In my opinion there are no matters arising that would provide the basis for declining PC72.

15 Rezoning the entire Site LZ is the most efficient and effective use of the Site,and is the most appropriate method to achieve the purpose of the Resource Management Act 1991.

AREAS OF DISAGREEMENT WITH OTHER TECHNICAL EXPERTS

Ministry for Education

16 Ms Lepoutre agrees with my suggested additional wording to be included within the ODP text as below.

> **At the time of subdivision, consultation with Ministry of Education will consider whether it is appropriate and necessary for any land be provided for education purposes within the Site, and the appropriateness of any amendments to the ODP to accommodate this.**

17 However, she considers further provision should be made in the Operative District Plan, namely, as an additional matter of discretion at subdivision stage; and in the list of matters the ODP should address in Policy B4.3.68. She considers this will provide greater clarity to the community; and be consistent with the agreed approach for PC69 and 73.

18 In my opinion, PC72 is not readily comparable with PC69 and 73 in terms of the need and likelihood that it will accommodate future educational facilities. It is far smaller in scale (appx 300 households), located at the township edge and in fragmented multiple ownership (existing tiles in the 2h – 4 ha range). PC69 and 73 (each for around 2000 additional households) are substantial proposals which will be master planned with community facilities and services,

[1] S42A Report at [163]

including local business centres in each case. I note the Reporting Officer's comment, that if just PC72 is approved additional demand on educational facilities will be modest. In these circumstances, reference within the ODP narrative to possible provision for educational facilities is all that is necessary.

19 Ms Lepoutre considers that

> under both the Operative and Proposed Selwyn District Plan, 'educational facilities' is not included within the definition of 'community facilities' as it has its own definition. Therefore, it is necessary for educational facilities to be enabled as its own use, rather than encompassed by 'community facilities'.
>
> In my opinion, educational facilities come under the definition of community facilities, and the educational facilities are a subset of community facilities. The Oxford (Paperback) Dictionary definition of community centre is
>
> A place providing social, recreational and educational facilities for a neighbourhood.

20 Ms Lepoutre seeks that the traffic assessment assess and respond to the potential traffic congestion and safety effects of possible Prebbleton educational facilities within the PC72 site. This is not feasible or appropriate given that there is no school proposal at this time. A separate designation process will be required if and when there is a firm proposal, which requires consideration of the appropriateness of the school site and its environmental effects.

Drinnans

21 Mr Fletcher considers that the PC72 rezoning if approved will result in significant changes in amenity for the Drinnan's. The NPS-UD 2020 anticipates significant changes in New Zealand's urban environments over time, including planned urban form; and that resulting changes in amenity are not of themselves an adverse effect.[2]

22 Mr Blakie has addressed the stormwater matters raised by Mr Fletcher.

23 Ms Forward (legal counsel) has addressed the scope issues raised by Mr Fletcher with respect to inclusion of part of the Drinnan's land as an extension to PC72.

24 Mr Fletcher suggests that if the Council requires further servicing assessments in support of inclusion of the Drinnan land as part of the rezoning proposal, this can be arranged. It would, in my opinion, be completely unreasonable to delay a decision on PC72 to give time for this further information to be supplied and considered, and potentially the hearing extended for this purpose. The Drinnans and their consultants have had ample time between notification of P72 on 30 June 2021 and the current time to investigate these matters.

25 Mr Fletcher suggests that the ODP could simply be amended by including the Drinnan's land as Living Z. With respect, this is unlikely to be sufficient. The purpose and requirements for an ODP are set out in Policy B4.3.8 below.

Policy B4.3.8
Each Outline Development Plan shall include:

[2] NPS-UD Objective 4, Policy 6b)

- *Principal through roads, connection and integration with the surrounding road networks, relevant infrastructure services and areas for possible future development;*

- *Any land to be set aside for*

    - *community facilities or schools;*

    - *parks and land required for recreation or reserves;*

    - *any land to be set aside for business activities;*

    - *the distribution of different residential densities;*

    - *land required for the integrated management of water systems, including stormwater treatment, secondary flow paths, retention and drainage paths;*

    - *land reserved or otherwise set aside from development for environmental or landscape protection or enhancement; and*

    - *land reserved or otherwise set aside from development for any other reason, and the reasons for its protection.*

- *Demonstrate how each ODP area will achieve a minimum net density of at least 10 lots or household units per hectare ;*

- *Identify any cultural (including Te Taumutu Rūnanga values), natural, and historic or heritage features and values and show how they are to be enhanced or maintained;*

- *Indicate how required infrastructure will be provided and how it will be funded;*

- *Set out the phasing and co-ordination of subdivision and development in line with the phasing shown on the Planning Maps and Appendices;*

- *Demonstrate how effective provision is made for a range of transport options, including public transport systems, pedestrian walkways and cycleways, both within and adjoining the ODP area;*

- *Show how other potential adverse effects on and/or from nearby existing or designated strategic infrastructure (including requirements for designations, or planned infrastructure) will be avoided, remedied or appropriately mitigated;*

- *Show how other potential adverse effects on the environment, the protection and enhancement of surface and groundwater quality, are to be avoided, remedied or mitigated;*

- *Include any other information which is relevant to an understanding of the development and its proposed zoning; and*

- *Demonstrate that the design will minimise any reverse sensitivity effects.*

There will also need to be some changes to the narrative, including addressing rural/urban interface/reverse sensitivity matters, and the same detail as is provided for on the notified PC72 ODP i.e. roading, pedestrian/walkway connectivity, stormwater area(s) etc.

ECAN/CHRISTCHURCH CITY COUNCIL

26 My response to the various matters raised by Marcus Langham is covered under the headings below.

Significant development capacity

27 Mr Langham appears not to agree with the Reporting Officer's view that the proposed 300 additional households enabled under PC72 will add significant additional capacity and that it equates to 25% of the annual demand for additional households in Selwyn. He considers this approach is 'problematic' because it does not account for planned growth in the Greenfield Priority or Future Development Areas or unplanned growth proposed by other private plan changes, not yet decided upon. He estimates that combined, this equates to approximately 10 years worth of growth based on Mr Clease's annual demand figures. However, the 'test' is not whether PC72 will add significant additional capacity in comparison to what else is planned or proposed. It is whether, on it's own terms, the capacity will contribute towardsds providing for at least sufficient feasible capacity for the short, medium and long term. proposed is significant. The evidence for PC72 is that it is.

Rural residential development

28 Mr Langham considers that PC72 is contrary to Policy 6.3.9.7 of the CRPS, which provides that *"a rural residential development area shall not be regarded as in transition to full urban development".* The full wording of the relevant part of the policy is

Rural residential development

In Greater Christchurch, rural residential development further to areas already zoned in district plans as at 1st January 2013 can only be provided for by territorial authorities in accordance with an adopted rural residential development strategy prepared in accordance with the Local Government Act 2002, subject to the following:…

7. A rural residential development area shall not be regarded as in transition to full urban development.

29 The rural residential area is to provided for in accordance with an adopted rural residential strategy, which in this case is the (outdated) Rural Residential Strategy 2014 (the RRS 2014). This is clear that private plan change requests for re-zoning will be required for each preferred area.

7.1 A number of sites have been identified in this Strategy as being potentially suitable for rural residential development. However none of these sites have been assessed to the level of detail necessary to establish whether or not they should ultimately proceed, or if they do what requirements should apply to them. Inclusion of sites in the Strategy simply establishes the sites as candidates for development at face value, subject to more detailed assessment and consideration under the RMA. Inclusion of a site in the Strategy is not a guarantee that it will ultimately be approved

7.2 To develop a site identified in this Strategy as a rural residential area, a change to the zoning in the SDP must first be undertaken. The Selwyn District Council does not intend to carry out such changes itself. Instead, the Council expects that private plan change applications will be made under the RMA. The

process for this is set out in Part 2 of the 1st Schedule to the RMA. The format for such a change shoulbe the Living 3 zone with its related objectives, policies, rules and performance standards.[3]

30 The CRPS requires that rural residential development is subject to an Outline Development Plan, which must be included in the relevant plan before subdivision proceeds.

> 6.3.3 Development in accordance with outline development plans
>
> Development in greenfield priority areas or Future Development Areas and rural residential development is to occur in accordance with the provisions set out in an outline development plan or other rules for the area. Subdivision must not proceed ahead of the incorporation of an outline development plan in a district plan…..

31 The above provisions are clear that rural residential areas must be provided for in a comprehensive manner by way of rezoning and supporting rules, including an Outline Development Plan. They cannot include provisions which enable the area to 'transition' to full urban development. The PC72 proposal is for full urban residential zoning, not a form of rural residential zoning which enables it to also be developed to higher urban densities ie. be in transition to full urban development. In my view there is no conflict between PC72 and policy 6.3.9.7.

32 Mr Langham considers that the proposal to zone the PC72 for residential rather than rural residential purposes is inconsistent with SODP Objective B3.4.6 which provides that:

> *Within the Greater Christchurch area covered by Chapter 6 to the Canterbury Regional Policy Statement, to provide for rural residential development only in the locations identified in the adopted Selwyn District Council Rural Residential Strategy 2014.*

33 I disagree with this view. This policy directs that land can only be utilised (zoned) for rural residential proposals if it is a Rural Residential Strategy 2014 preferred area. It is not saying that the preferred areas must be used (zoned) for rural residential purposes. There are a total of 15 preferred areas, able to accommodate appx 655 rural residential lots in total. The Council has relied on private plan change proposals to facilitate Living 3 zoning and enable their development for rural residential purposes. In some cases, they remain zoned rural, and in the case of the South Rolleston preferred area (Rolleston Preferred Area 2[4]) the land has been developed for full urban residential purposes (as a Housing Accord Area).

34 Under his discussion of 'loss of highly productive land', Mr Langham acknowledges that "*Living 3 zoning of the site will result in rural-residential land, and is unlikely to result in economic farming units, I do consider that some productive use would still be able to occur. This could be through the use of self-sufficient production, or small scale horticulture where food can be produced for farmers' markets or similar*." With respect, I think this is highly unlikely, and bordering on being 'fanciful'.

35 He has provided no evidence to support his view that average 5000m^2 are likely or able to support small scale horticulture or self sufficient production. In my experience, rural residential lots at this size are purely lifestyle lots with some very low level activity where necessary for maintenance purposes e.g.sheep or horse grazing. If any such production were to occur, it

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[3] Selwyn Rural Residential Strategy 2014 - https://www.selwyn.govt.nz/__data/assets/pdf_file/0004/139594/02-RRS14-Web.pdf

[4] Ibid footnote 2 page 56

would be a rarity, and be so minimal as to make no meaningful contribution towards the productive use of the land for primary production purposes.

36 Mr Langham's preference for Living 3 zoning of the PC72 site appears to be largely if not entirely based on the fact that it is "*the most appropriate option for giving effect to the higher order planning documents, and would not be contrary to the directions of the NPS-UD*." However, this is not the correct test under s32 of the RMA. The overall costs and benefits of alternatives must be considered and their relative efficiency and effectiveness assessed. In my opinion, it is not sound resource management practice to rely on outdated documents which is clearly the case with the Selwyn Rural Residential Strategy 2014. It predates the Birchs Park proposal, which has significantly changed the urban form context for the PC72; and the changes in the local housing market which have culminated in the current housing market at Prebbleton with unprecedented escalation in prices due to an extreme shortage of supply in the fact of very strong demand. These factors support my evidence that, in today's market conditions, utilisation of the PC72 land for low density rural residential purposes would be a much less efficient use of the land than full urban residential zoning.

37 Mr Langham is concerned that if PC72 proceeds, this will place pressure for further expansion of rural residential development elsewhere by reducing the amount of land available for rural residential growth. With respect, I don't see why this a problem. The Rural Residential Strategy 2014 is dated, and overdue for review – it was to be reviewed within five years i.e. in 2019[5], but this has not happened, and it is relied on in the Proposed Selwyn District Plan (PSDP) to identify Urban Growth Overlay areas for rural residential development. There are potential alternative locations available, including at Prebbleton, and submissions on the PSDP requesting rural residential rezoning elsewhere, including west of Shands Road[6]. The loss of a potential rural residential site, and the need for an alternative is a 'cost' of approving PC72. However, in my view, it is not a significant 'cost', and one that does not change my view that the most appropriate option in terms of promoting nearly all of the objectives and policies of relevant statutory documents is for the PC72 site is full residential zoning.

Intensification Targets

38 In his discussion on Objective 6.2.2 Mr Langman expresses a concern that *" development of greenfield land outside of that planned in the CRPS has a two-fold impact. It increases the amount of land for greenfield development, and as a proportion of the overall supply of housing then impacts on the ability to achieve intensification targets within Greater Christchurch. If greenfield development is significantly increased above levels anticipated, this will have a flow on effect of proportionally reducing the success of delivery of housing through intensification of existing brownfield areas".*

39 As mentioned in my evidence this is not borne out by current trends. The HDCA indicates that the intensification targets are being achieved despite significant post earthquake greenfields zoning. As greenfield land has been used up in Christchurch City the trend has been towards intensification in CCC although it is difficult to prove a causal link between the two forms of development.

40 In para 51 referencing Map A Mr Langman discusses the way in which the CRPS provides certainty for the private and public sectors. While I agree that certainty is important, this certainty refers to outcomes, not process. I consider that flexibility is also important, when developing processes, and this is supported by the NPS-UD which opposes rigid urban limits -

[5] Ibid, footnote 2, paragraph 8.11
[6] PSDP submission 488 Dally Family Trust and R&JMcIlraith.

"*a hard rural urban boundary without the ability to consider change or movement of that boundary would not meet the requirements of the responsive planning policy*."[7] The hearings on both the Christchurch Replacement District Plan and Our SPACE provided numerous examples (as Mr Langman will know) of meritous zoning proposals that had to be rejected by the respective Panels because they were considered as not giving effect to the CRPS.

41 In Paragraph 55 Mr Langman appears to claim that the Minister has signed off the CRPS as giving effect to the NPS-UD "When CRC provided its recommendation report to the Minister it included an evaluation of Change 1 against the relevant statutory framework, which included the NPS-UD. The evaluation documented how Change 1 would give effect to the NPS-UD. In approving Change 1 the Minister specifically acknowledged that CRC had complied with the RMA, regulations made under it, and any relevant national direction":.I am unable to see anything in the Minister's letter to Ecan that supports this view. It simply records that, in using the Streamlined Planning Process for Change 1, Ecan complied with the Act and any relevant national direction (attached as **Appendix A**). I do not consider this as an endorsement of the CRPS in the way Mr Langman appears to describe it. Not only that, Change 1 was based on the 2018 HDCA.

Housing needs

42 Mr Langham states that the economic assessment accompanying the plan change application *'narrowly'* looks at supply and demand only in Prebbleton. He appears to have overlooked the economic evidence for the PC72, in particular Mr Colegrave's evidence which considers the District, sub-District and Prebbleton markets. Mr Colegrave concludes that the Council is currently not meeting its obligations to provide at least sufficient capacity to meet the demand for new dwellings, as required by the NPSUD, at either the district or sub-district level; that additional land needs to be identified and rezoned as soon as possible to meet NPSUD obligations, and to enable the efficient operation of the local land market; and that PC72 will assist, providing a substantial, direct boost in market supply to meet current and projected future shortfalls.

43 In Mr Langham's view, the NPS-UD does not require that all locations with high demand should increase supply. However Objective 3 requires regional policy statements and district plans to enable more people to be located in areas of an urban environment where one or more (my underlining) of the following apply:

a) the area is in or near a centre zone or other area with many employment opportunities

b) the area is well-serviced by existing or planned public transport

c) there is high demand for housing or for business land in the area, relative to other areas within the urban environment.

Only one of the above is required to be met – although in the case of Prebbleton all three are met in any case. The evidence is that demand for housing is very high in Prebbleton, including relative to some other areas, including Christchurch City , and in the face of very restricted supply this has resulted in extreme price escalation and a dysfunctional market.[8]

44 Mr Langham is concerned that the range of typologies enabled by the proposed rezoning do not sufficiently align with housing trends identified in the 2021 HCA, which will require a significant

[7] Ministry for the Environment Responsive Planning Fact Sheet p2
[8] Evidence in chief and summary evidence of Mr Colegrave, Mr Sellars and Mr Jones.

increase in the demand for smaller and multi-unit dwellings across a broader range of tenures. In his view, "*before PC72 warrants approval, it would need to propose typologies and tenures that can meaningfully set it apart from other developments currently being advanced within the PIB"*. By way of explanation he states "*I consider that the criteria that are yet to be developed by CRC will engage with demand, typologies and needs in this way, and that any assessment of significance in the meantime should directly consider these aspects*."

45 It is not appropriate, in my opinion, to second guess what the CRC criteria will be. Currently they do not exist. Councils in assessing development capacity provided by a plan change can only have particular regard to the other two Clause 3.8 (2) criteria, namely whether the development capacity would contribute to a well functioning urban environment, and be well-connected along transport corridors. The evidence is that development enabled by PC72 will.

The Resource Management (Enabling Housing Supply and Other Matters) Act

45 Mr Langham states that the RM Amendment Act significantly impacts the potential for intensification and development capacity within existing urban areas, and increases the ability of existing urban areas to meet demand through re-development. It will be many years before the impact of this legislation begins to become clear including spatial patterns of intensification within Christchurch City and surrounding townships. In any event the proposed plan change is more consistent with what the Amendment is trying to achieve than the rural residential development anticipated for the Site in CRPS and OSDP by virtue of its status as a preferred rural residential site. Mr Colegrave recommends, with reasons, applying caution in assuming any immediate drastic rise in housing capacity released through recent reforms.[9]

Cumulative and precedent effects

46 In my view, policy 8 of the NPS-UD expressly provides for the consideration of private plan change requests, and it may be problematic to assess the cumulative effects of allowing individual requests on their merits. Nevertheless the NPS-UD provides guidance on what may constitute a meritorious proposal such as , its connectivity along transport corridors, and its contribution to a well-functioning urban environment. Other provisions within the NPS-UD also require a broader consideration of proposals, including their integration with infrastructure planning and funding decisions,. Such matters require decision makers to determine the merits of proposals individually and to an extent, strategically. I do not share Mr Langman's concerns that approving this plan change will necessarily compromise strategic outcomes or establish a (negative) precedent. In any event, I consider that objective 6 and policy 8 of the NPS-UD clearly accepts that responsive decision making warrants a merits-assessment of proposals that are unanticipated or out-of-sequence.

Preference for strategic spatial planning processes

47 Mr Langham considers that the Greater Christchurch 2050 spatial planning exercise is the preferred option for identifying areas for additional urban development, as opposed to through private plan change applications such as PC72. I understand this sentiment, but the reality is that the NPS-UD, including Policy 8, clearly contemplate significant plan changes proceeding ahead of spatial planning processes. I do not consider that declining PC72 so it could be determined at a later time through a Council led strategic planning process would be 'responsive'. In the current circumstances in particular, where there is an urgent need for additional land for housing, Councils simply cannot afford the luxury of waiting for this process

[9] Summary Evidence of Mr Colegrave at [13] to [17]

CRPS Objectives and Policies

49 Mr Langham considers that PC72 will not give effect to a number of the CRPS objectives and policies. An assessment against these is well traversed in my evidence and **Appendix 13** of notified PC72.

Infrastructure

50 With reference to CRPS Policy 6.3.5, Mr Langham is concerned that the proposal will not achieve appropriate integration of land use development with infrastructure. His particular concern is wastewater infrastructure, and that "*approving PC72 could potentially undermine the timely delivery of other land already identified for planned urban development within the PIB (and the FDAs) that will be reliant on the remaining infrastructure capacity at the Pines WWTP until such time as upgrades are completed and the full range of consents are obtained*."

51 This has been addressed in the Reporting Officer's report, in my evidence and in the evidence I rely upon, however I note the following points in particular. Mr Fox's Summary Evidence addresses Mr Langham's particular concern with wastewater capacity.

52 Policy 6.3.5(2) specifically seeks that the *'nature, timing and sequencing of new development'* is *'coordinated with the development, funding implementation and operation of …infrastructure'* and clause (2)(e) of the policy seeks that *'appropriate infrastructure'* is in place at the time new development occurs. I acknowledge the need for practical coordination of development and infrastructure provision and based on the evidence of Mr England and Mr McLeod, I consider that will be the case.

53 On this basis, I disagree with Mr Langman's assessment of CRPS Policy 6.3.5 or his concern that the proposal will not achieve appropriate integration of land use development with infrastructure.

Transport

54 The CCC is specifically concerned that the Integrated Transport Assessment (**ITA**) shows that the vast majority of residents commute from Prebbleton to Christchurch for work (72%). No additional employment opportunities are provided for as part of PC72, and so it is expected that the commuter contribution will remain at least at this level. Although the employment base in Prebbleton is currently limited, as already mentioned the Site is close to the south west industrial area (Hornby and Halswell) Lincoln and Rolleston. There is potential for additional public transport services to connect Prebbleton with Lincoln and the Central city. The real estate evidence[10] is that "*it is common for the (Prebbleton) purchasers to have some employment in the Selwyn District but given the ease of the commute to inner Christchurch, it is no longer a deterrent for those who do work in the Christchurch city centre. Another common cliental are those at the 'retirement' end of the spectrum, who are looking for a low-maintenance new-build options, with higher spec construction to provide easy warmth, heating, and maintenance. The price of sections/houses in Prebbleton has often been a prohibitive factor for first-home buyers, so I wouldn't categorise them as a main purchaser within the Prebbleton market*."

Residential density

55 The 12hh/ha density proposed achieves that required in CRPS Policy 6.3.7 and in Chapter B4 of the Plan and does not preclude a greater density being provided. Housing typologies and

[10] Evidence of Chris Jones

tenures are not prescribed, but variety in this regard is not precluded. I consider the proposal will *'enable a variety of homes that meet the needs… of different households'* as sought by NPS-UD Policy 1 (and CRPS objective 5.2.1 and SODP Objective B3.4.4) and I do not agree with Mr Langman that more is required in this respect for the proposal to qualify as 'significant' under Policy 8.

Greenhouse emissions

56 Mr Langman considers reliance on private vehicles 'prevents' PC72 from supporting reductions in greenhouse gas emissions. Paragraph 66.1 of my evidence has addressed the language used in the NPS-UD and concludes that an absolute reduction in greenhouse gas emissions is not required. Indeed, that is unlikely to be achievable in any greenfield location where private vehicle use will predominate. Accounting for the accessibility and connectivity proposed, and the evidence of Mr Farrelly, I consider the proposal will support reductions in greenhouse gas emissions in the manner sought by Objective 8 and Policy (1)(e). I consider the site is well connected to transport corridors via a range of transport modes, has access to existing public transport services that can be readily adapted to service the Site. Localised network effects can be effectively managed, and the proposal is unlikely to result in significant wider transport network effects beyond what are already anticipated by strategic growth plans and policies (such as Our Space and the CRPS).

CONCLUSION

57 There is no sound resource management reason to postpone (indefinitely) land rezoning where, as in this case, planning studies and the evidence establish that the land is highly suited to residential development and is consistent with and will give effect to all relevant statutory planning objectives and policies - except where they are now outdated and misaligned with more recent national planning directives (in this case the CRPS and OSDP restrictive, allocative urban limit approach to urban growth management). I fully support PC72 and conclude that it should be approved.

Appendix A Minister's Streamlined Planning Process Decision on Proposed Change 1 to Chapter 6 of the CRPS

31 January 2022

Fiona Aston

Hon David Parker BCom, LLB

Attorney-General
Minister for the Environment
Minister for Oceans and Fisheries
Minister of Revenue
Associate Minister of Finance

28 MAY 2021

2021-B-07927

Dr Stefanie Rixecker
Chief Executive
Environment Canterbury
stefanie.rixecker@ecan.govt.nz

Dear Dr Stefanie Rixecker

Resource Management Act 1991: Streamlined Planning Process Decision on Proposed Change 1 to Chapter 6 of the Canterbury Regional Policy Statement

Following Environment Canterbury's completion of the Streamlined Planning Process directed by me on 29 April 2020, I am pleased to advise you that, under clause 84 of Part 5 of Schedule 1 of the Resource Management Act 1991 (RMA), I am referring Proposed Change 1 to Chapter 6 of the Canterbury Regional Policy Statement (as submitted by the Council under clause 83(1) of Part 5 of Schedule 1 on 29 March 2021, back to Environment Canterbury **with my approval**.

The reasons for my decision are as follows:

- Environment Canterbury has complied with the procedural requirements, including timeframes required by the Direction 2020-go1780 and 2020-go3773 on Proposed Change to Chapter 6 of the CRPS;
- Environment Canterbury has had regard to the Statement of Expectations as:
    - the proposed change to the Canterbury Regional Policy Statement will enable district councils to provide higher density living environments, including mixed use developments and a greater range of housing types, and will enable the efficient provisions and use of network infrastructure within Future Development Areas;
    - the dates and anticipated timeframes for the process Steps (and updates as necessary) were placed on a publicly accessible website; and
    - submissions were made available on a publicly accessible website within four working days after the submissions period has closed. One late submission received on 2 March 2021 was made available within 2 working days on the same website.
- Environment Canterbury has complied with the Resource Management Act 1991, regulations made under it, and any relevant national direction;
- The purpose of the streamlined planning process has been met, being a process for the preparation of a planning instrument in order to achieve an expeditious planning process that is proportionate to the complexity and significance of the planning issues being considered; and

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- I have had regard to the requirements of Part 2 of the Resource Management Act 1991 in deciding to approve Proposed Change 1 to Chapter 6 of the Canterbury Regional Policy Statement.

In accordance with clause 90(2) of Schedule 1 of the RMA, you are now required to publicly notify this decision. Proposed Change 1 to Chapter 6 of the Canterbury Regional Policy Statement will become operative in accordance with clause 20 of Schedule 1 of the RMA.

Thank you for undertaking the Streamlined Planning Process.

Yours sincerely

Hon David Parker
Minister for the Environment