

**BEFORE SELWYN DISTRICT COUNCIL**

**IN THE MATTER OF: the Local Government  
Act 2002**

**AND**

**IN THE MATTER OF: Draft Rural Residential  
Strategy (RSS13)**

**STATEMENT ON BEHALF OF CANTERBURY REGIONAL COUNCIL**

## **1.0 BACKGROUND AND EXPERIENCE**

- 1.1 My full name is Michael David Rachlin. I am a Principal Planner at the Canterbury Regional Council ("CRC"). I hold a BA(Hons) in Town & Country Planning (University of Manchester, UK), a Bachelor of Planning (with Credit) in Town & Country Planning (University of Manchester, UK) and a MSc in Environmental Assessment and Management (Oxford Brookes University, UK). I am a Chartered Town Planner and have been a Member of the Royal Town Planning Institute (UK) since 1991. I have over 20 years experience in the planning field, including planning for urban expansion, managing and assessing urban developments, the assessment of environmental effects
- 1.2 I have been employed by the Canterbury Regional Council since 2008 and am familiar with the district council's work on managing rural residential development having been involved with submissions on PC17 and PC32, together with PCs 8 and 9 (former Selwyn Plantation Board sites at Rolleston rezoned to Living 3).
- 1.3 I have prepared a brief statement in support of the submission from the Canterbury Regional Council. I note that Mr Friedel's officer's report provides background and context for the development of the RRS13, its relationship to the Land Use Recovery Plan and Canterbury Regional Policy Statement, as well as the timelines/actions required by the district council to give effect to LURP Action 18. As such I do not intend to traverse these matters nor repeat what has already been set out in the officer report. Additionally I have not sought to comment on individual sites nor the quantum of rural residential land supply in either the notified version of the RRS13 or as amended in the officer's report. These are considered matters for the district council subject to the outcomes sought in other planning documents such as the Canterbury Regional Policy Statement (CRPS).

## **2.0 Statement in support of Submission**

- 2.1 Mr Friedel's report identifies the drivers for the preparation of the RRS13 and the outcomes it is seeking to achieve. It is also useful to remember that the adopted strategy will additionally help the district council achieve an important purpose of local government; namely to meet the current and future needs of communities for good-quality local infrastructure (s10 Local Government Act 2002 refers). The LGA02 defines good-quality local infrastructure as efficient and effective. Careful management of rural residential growth within the district is necessary to deliver this outcome, overlain by the need to facilitate recovery from the 2010 and 2011 earthquakes. This includes the co-ordinated and timely provision of infrastructure for residential and business land identified in Chapter 6 to the RPS.
- 2.2 The Canterbury Regional Council's (CRC) submission supports the Selwyn District Council's RRS13 including the strategic framework and

site assessment process used to identify and manage rural residential development. The RRS13 and site assessment process will help ensure that optimal sites come forward for rural residential development, in a manner that does not undermine the outcomes sought by planning documents such as the Canterbury Regional Policy Statement and the Land Use Recovery Plan. These planning instruments have enabled limited rural residential development as a housing choice matter rather than a key earthquake recovery issue. It is important that such developments do not detract from the recovery process for example by distorting infrastructure and roading programmes through demands for them to be serviced ahead of, or indeed instead of, residential and business land.

- 2.3 They also should not undermine the consolidated urban form sought by Chapter 6 to the RPS. In my opinion the RRS13, including the amendments being recommended by the Officer, achieves an appropriate balance between providing for limited scale rural residential development as a housing choice whilst ensuring strategic recovery and urban form outcomes are not undermined. This also relates back to the purpose of providing good-quality local infrastructure. Within Greater Christchurch the provision of local infrastructure is intrinsically linked to the issue of enabling and facilitating recovery.
- 2.4 Method (3) to RPS Policy 6.3.9 supports the preparation of the RRS13 with Policy 6.3.9 providing the main strategic and spatial criteria for site selection. The RRS13 makes appropriate use of these criteria to inform the site selection process, together with local considerations such as avoiding long term growth pathways for settlements. I am aware, however, that an issue has arisen in relation to the role and purpose of sub-clause (7) to Policy 6.3.9 and here I do part, to an extent, from Mr Friedel's opinion. Below I provide my views on how sub-clause (7) is to be applied for planning purposes.
- 2.5 As I have identified above, Policy 6.3.9 provides the criteria for rural residential development further to areas already zoned in district plans as at 1 January 2013. Rural Residential development can only be provided for in accordance with an adopted rural residential development strategy, must, inter alia, be outside the greenfield priority areas for development and existing areas and must be capable of being economically provided with a reticulated sewer and water supply integrated with a publicly owned system, together with legal and physical access by sealed road. There are also a number of other constraints identified in sub-clause (5) for the location of proposed rural residential development.
- 2.6 Looking at Policy 6.3.9(7) and giving the clause its plain and ordinary meaning, in my view it is simply stating that once an area is provided for as a rural residential development area, it should not then be seen as a transition to full urban development. I consider that sub-clause (7) only

applies once the land is identified or zoned rural residential, not as a tool to preclude such identification or zoning. In other words sub-clause (7) in and of itself does not preclude rural residential development from occurring within the "white land" (the area of land shown on Map A to Chapter 6 as within the infrastructure boundary for a settlement but not otherwise identified as an existing urban area or greenfield Priority Area) identified pending intensification to residential density.

- 2.7 In my view this is also consistent with the last sentence of the explanation of Issue 6.1.5 of Chapter 6 which states that:

*"This can lead to pressure for future urbanisation, which is difficult to achieve in an effective manner given that the land use pattern has been established for a different purpose."*

- 2.8 There can, of course, be other reasons why this land should not be identified for future proofed rural residential development. To identify "white land" for future proofed rural residential development may foreclose additional greenfield residential opportunities if it is identified as a result of monitoring under Policy 6.3.11 that further greenfield residential land is required for recovery. In particular fragmentation of greenfield blocks may frustrate the ability to release further coherent and comprehensive blocks of land necessary for recovery purposes.
- 2.9 Policy 6.3.11 sets out a monitoring framework including for rural-residential development and the Canterbury Regional Council is required to publish a comprehensive monitoring report every 3 years. Sub-clause (4) sets out the circumstances when a review of the extent and location of land for development is to occur whilst sub-clause (5) sets out where such additional land can be supplied from. Criteria for this includes, inter alia, infrastructure being in place or capable of being economically provided, accessibility to community and commercial facilities, and maintaining open space landscape character between towns. Having regard to these locational criteria and the overriding recovery and urban consolidation objectives of Chapter 6, the Panel may consider that, in some locations, the fragmentation of land is not to be encouraged by its identification for rural-residential.
- 2.10 Mr Friedel has also identified other relevant matters such as the identification of "white land" in the district council's adopted structure plans for longer term urban growth, efficiency of infrastructure provision etc. These are all valid matters for the district council to include in their assessment criteria in addition, or complementary, to the Policy 6.3.9 considerations. It is also worth bearing in mind that Policy 6.3.1 (sub-clause 4) requires urban activities to only occur within existing urban areas or identified greenfield priority areas, and so excludes "white land".
- 2.11 As I touched on earlier policy 6.3.11 requires the Canterbury Regional Council to monitor the supply, uptake and impacts of rural residential activities. Mr Friedel's recommendation for local monitoring would be

consistent and indeed support the requirement under Policy 6.3.11. This monitoring via a comprehensive monitoring report every three years, will be used to help inform on-going land supply issues and the need for the release of additional land. I would suggest that the Panel is mindful of this monitoring requirement in determining the amount of land that might come forward now through the RSS13.

### **3.0 CONCLUSION**

The Canterbury Regional Council continues to support the RRS13 and the district council's criteria based assessment. This approach ensures that optimal sites for rural residential are made available to provide housing choice, but in a form that will not undermine earthquake recovery and urban consolidation. I consider that these represent overriding considerations for the Panel in determining the RRS13 together with the need for caution given the adverse effects rural residential development may give rise to as identified in Issue 6.1.5 to Chapter 6.

**Michael David Rachlin**

**7<sup>th</sup> April 2014.**

