

17 February 2019

Selwyn District Council
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Christchurch City Council submission on the Private Plan Change 62 Request for Leeston Dunsandel Road, Harmans Road and High Street, Leeston notified by Selwyn District Council.

1 Introduction

- 1.1 Christchurch City Council (the Council) thanks Selwyn District Council for the opportunity to submit on the Private Plan Change Request (Plan Change 62) for Leeston Dunsandel Road, Harmans Road and High Street, Leeston. The request seeks to rezone 60.672 hectares of land, which would result in the ability to provide for a total of 410 residential allotments in Leeston

2 Summary

- 2.1 Our Submission addresses:
- a. The potential wider transport effects on Christchurch City;
 - b. The direction provided by higher order documents for urban growth in Canterbury;
 - c. The value of rural production land to the Canterbury region; and
 - d. Impact on the Greater Christchurch Urban Development Strategy
- 2.2 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 planning for growth in its townships, through documents such as the Ellesmere Area Plan 2031/ Mahere-a-Rohe o Waihora. However, the amount of land proposed to be rezoned in this request, goes beyond the amount of land identified for growth in the Ellesmere Area Plan. Council questions the need to provide more growth than has been identified as needed for the projected growth of the town. This creates the risk that new residents will not be able to find sufficient employment in the local area and will commute to Christchurch City. The majority of Leeston residents who commute, already commute into Christchurch City for work. There are limited transport options from Leeston, and increased commuting for Leeston will likely increase car travel, emissions and contribute to the congestion issues on commuter routes into Christchurch City. Increasing commuting from Leeston is not consistent with what is sought by the higher order planning documents.
- 2.3 Council is also concerned that this plan change seeks to re-zone rural land that has been identified in the proposed National Policy Statement on Highly Productive Land (pNPS-HPL)

as Highly Productive Land. Reduction of rural production land could have an impact on the food resilience and economic production of the Canterbury region.

- 2.4 As a member of the Greater Christchurch partnership, Council also questions whether this development and others beyond the Greater Christchurch boundary, raise the issue of whether the Greater Christchurch partnership has a view on this type development beyond the boundary, including whether the boundary needs to be extended to cover a wider area, including Leeston. Council would like to discuss this issue with the Greater Christchurch Partnership.
- 2.5 Council recognises the need for Selwyn District Council to provide sufficient housing capacity to meet future growth. Council is happy to continue to work with Selwyn District Council and the Greater Christchurch Partnership on this, and to also ensure that this capacity is accessible by a range of transport modes, reduces commuting distances, and does not compromise highly productive land. Council considers there are other parts of Selwyn District where there is a greater possibility of achieving this, than the area identified for re-zoning in Plan Change 62.
- 2.6 Council notes the timeline for lodgement of this Private Plan Change, with the Selwyn District Plan review scheduled for notification in the first half of this year and the Canterbury Regional Policy Statement (CRPS) scheduled for review in 2023 with the work programme progressing shortly. Council suggests that the Selwyn District Plan review may be the more appropriate forum for this discussion as it will encompass the wider strategic objectives for the Selwyn region. It is also noted that the National Policy Statement for Highly Productive Land (pNPS-HPL) is currently subject to consideration by Ministers and Cabinet for approval, with a decision expected in the first half of this year. Council wish to highlight the timeline for lodgement of this Private Plan Change ahead of the expected decision on the NPS-HPL being gazetted.

Submission

3 Transport Effects.

- 3.1 The Greater Christchurch sub-region boundary was determined in the mid 2000's when the Greater Christchurch Urban Development Strategy was developed, based on an approximately 30 minute commuter window into the Christchurch central business district (CBD). However, as improvements have been made (and are being made) to the transport network, through developments such as the Christchurch Southern Motorway, the distance of the 30 minute commuter window is growing. Development of satellite towns beyond the Greater Christchurch boundary could have an impact on the transport planning that the Council has completed to reduce commuter traffic, and the implications that this will have on the Council's carbon footprint.
- 3.2 Statistics New Zealand provides a visual representation of commuter traffic to and from Leeston based on the 2013 Census data, which clearly shows a strong movement of commuter traffic into the Christchurch City (refer Attachment A). This shows that more Leeston residents commute out of Leeston for work, than work in Leeston. Of those who commute, the majority commute to Christchurch City. According to the Census data, 100% of these commuters drove to work in single occupancy vehicles. Leeston is an approximately 30 minute drive from employment areas in Hornby.

- 3.3 The proposal does not include any additional commercial development to the Leeston area to support this proposed residential growth, and therefore is likely that the increased residential development will result in a higher commuter traffic volume into Christchurch City.
- 3.4 Recently the Selwyn District Council has introduced a trial bus service from the Leeston area into the Greater Christchurch region to respond to increased commuter traffic. This is a targeted bus service funded independently by Selwyn District Council and is not part of the wider transport network operated and managed by Environment Canterbury. It is important to note that this bus service is direct from Leeston to Christchurch CBD and does not provide stops at Rolleston or Lincoln townships. Currently, this is only a single service, operated into the Christchurch CBD in the morning and out to Leeston in the evening. It is not certain at this stage whether this service will continue permanently.
- 3.5 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.
- 3.6 In May 2019 the Council declared a climate emergency to enable climate to be a primary consideration for long-term planning and set the target for Christchurch to be a carbon neutral city. Transport planning and infrastructure is a significant component of moving to a carbon neutral city and it is important that new urban growth areas occur in locations which align with this wider climate change objective.
- 3.7 While the proposal includes pedestrian and cycle links within the site, and to Ellesmere College/Te kareti o Waihora and to Leeston township there has been no consideration of alternative transport options outside the Leeston township.
- 3.8 The transport effects assessment provided in the proposal is localised to the site and immediately surrounding area, with no consideration for transport effects on the wider region.

4 Higher Order Documents

- 4.1 Whilst Leeston is not within the Greater Christchurch Urban Development Strategy Boundary and thus Chapter 6 of the Canterbury Regional Policy Statement (CRPS) does not apply, Chapter 5 does apply. Chapter 5 of the CRPS has a stated objective (5.2.1(1)) that development is located and designed so that it functions in a way that achieves consolidated, well designed and sustainable growth in and around existing urban areas as the primary focus for accommodating the region's growth. The proposal is inconsistent with this objective as the Selwyn Capacity for Growth Model (SCGM) forecasts that there is already sufficient capacity for residential growth through both infill and greenfield opportunities. The SCGM does not identify a deficiency in new residential development that would provide for the rezoning of rural production land to residential. Consequently, there is no predicted growth that needs to be accommodated in accordance with objective 5.2.1 of the CRPS.
- 4.2 This position is further supported by the Ellesmere Area Plan 2031/ Mahere-a-Rohe o Waihora (EAP), which is a non-statutory document developed by Selwyn District Council to guide development and inform the upcoming district plan review. The EAP says that the population of Leeston in 2015 was 2,275 people (813 households), with this population projected to grow to 3,402 (1,215 households) by 2031. This represents an estimated increase of 1,127 people (402 households). There is current sufficiently zoned capacity for a potential yield for at least 803 households. Consequently the EAP states on page 25 that:

“No new areas for residential or business development have been identified as being necessary to be proactively zoned by Council in response to the projected growth within the Ellesmere 2031 planning horizon. This is on the basis that there is currently sufficient residential land available to accommodate projected population growth, or there are constraints that need to be addressed through the RMA process.”

The EAP concludes on page 29 that:

“No new areas for residential purposes are required to accommodate projected growth within Leeston over the Ellesmere 2031 planning horizon as there is currently sufficient residential, business and industrial land available to accommodate projected population growth and demand for housing.”

- 4.3 Rezoning land to create 410 additional households would significantly enlarge the size of the town, it is more than half the number of existing households in the town.
- 4.4 The EAP has been developed to give effect to the principles contained in Chapter 5 of the CRPS, the SCGM and the Area Plan principles.
- 4.5 The higher order documents have been developed to enable growth to occur in the wider Canterbury region in an integrated and consolidated manner. The risk of providing an increased supply of residential land beyond the forecast need is a dispersed settlement pattern that reduces the sustainability of our rural communities.
- 4.6 This position by Council is supported by the CRPS which considers land use and transport integration in the wider Canterbury region. This policy states:

Policy 5.3.8 –Land use and transport integration (Wider Region)
Integrate land use and transport planning in a way:
 1. *that promotes:*
 - (a) *the use of transport modes which have low adverse effects;*
 - (b) *the safe, efficient and effective use of transport infrastructure, and reduces where appropriate the demand for transport.*
- 4.7 The proposal is inconsistent with the above policy in the CRPS as the new residential development will be primarily car based which has a significant adverse effect on the sustainability of the Canterbury region.
- 4.8 The release of residential land beyond the forecast growth models has the potential to undermine the higher order documents which have been developed to provide for sustainable communities.

5. The value of rural production land

- 5.1 The proposed National Policy Statement for Highly Productive Land (pNPS-HPL) identifies fragmentation of our productive land as a national resource management issue which needs to be addressed to enable the availability of highly productive land for primary production now and for future generations.

- 5.2 The proposal includes the rezoning of rural land to residential land. The EAP (page 25) identifies that the “land to the south-west is comprised of Class II versatile soils and the balance of the land surrounding Leeston is comprised of Class III versatile soils, both of which are valued for their productive capacity.” This aligns with the pNPS-HPL which was open for consultation between 14 August and 10 October 2019, and is now being considered by ministers and Cabinet for approval. While this higher order document does not currently hold any statutory weight, the information which has informed this document is robust and provides clear direction on the value of our versatile and productive land. Classes I,II and III versatile soils were identified as Highly Productive Land and in need of protection in the pNPS-HPL.
- 5.3 If the pNPS-HPL is progressed as notified and consulted on, it is likely that the proposed rezoning would be restricted as residential use would likely be considered an inappropriate use and development of highly productive land. The pNPS-HPL will likely exempt highly productive land which has an alternative zoning authorised in a Resource Management Act statutory document, for example the District Plan. It is noted that the EAP is not considered to be a statutory document under the Resource Management Act. The lodgement of the private plan change ahead of the likely gazetting of the NPS-HPL is questionable, and has the potential to undermine the intent of the NPS-HPL.
- 5.4 Council notes that the EAP identifies the zoned Outer Plains land as ‘possible future area for low density residential development’ in Figure 9 (page 27). This preferred future development area is not supported anywhere in the EAP, is not subject to a deferred zoning status and is contrary to the advantages noted in the EAP for Leeston Area 1 (LEE 1) that the intensification of LEE 1 optimises land development in an area that avoids future low-density residential development precluding a future growth path as far west as Harmans Road (page 28).
- 5.5 Productive land in the Canterbury region holds substantial value as it contributes to the sustainability of the region through providing land on which locally grown and sourced produce can be farmed appropriately. This then reduces the transport costs associated with the distribution of food to the Christchurch City and provides for a variety of land uses in the surrounding region.
- 5.6 If the Canterbury region is to become carbon neutral, providing for highly versatile and productive land in proximity to the city is essential.

6. Impact on the Greater Christchurch Urban Development Strategy

- 6.1 Council, along with Selwyn District Council, is a member of the Greater Christchurch partnership. Council is supportive of the Greater Christchurch Urban Development Strategy (UDS) objective to consolidate urban growth. There is a risk to the implementation of the Strategy from urban development beyond the UDS boundary that goes beyond just supporting local needs, undermining the objective to consolidate urban growth. Council questions whether this development and others beyond the Greater Christchurch boundary, raise the issue whether the Greater Christchurch partnership has a view on this type development beyond the boundary, including whether the boundary needs to be extended to cover a wider area, including Leeston. Council would like to discuss this issue with the Greater Christchurch Partnership.
- 6.2 As a member of the Greater Christchurch Partnership, Council is working with the Selwyn District Council on finding sufficient housing capacity for future growth. There are upcoming

opportunities such as the development of the next Future Development Strategy where it can be ensured that there continues to be sufficient housing capacity for future growth. Council would like to work with Selwyn District Council through these processes to find sufficient capacity to meet our future needs, which also ensures that this capacity is accessible by a range of transport modes, in particular public transport, reduces commuting distances, and does not compromise highly productive land. There are other parts of Greater Christchurch, which are closer to Christchurch City and are not identified as highly productive land, which may be more appropriate for urban development than the area identified for re-zoning in Plan Change 62. Council would like to continue to work with Selwyn District Council on these possibilities.

7 Relief Sought

We seek:

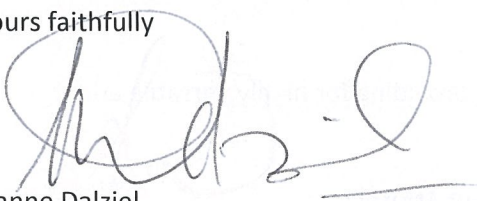
- 7.1 That the plan change relating to the rural zoned land is refused due to the effects on the significant wider transport network. This position is supported by the higher order documents in the CRPS, SCGM and EAP.
- 7.2 That the plan change relating to the deferred zoned land is accepted in part, with the deferred zoning confirmed with no intensification. This position is supported by the higher order documents in the CRPS, Our Space, SCGM and EAP.

Thank you for the opportunity to provide this submission.

We reserve our right to be heard in regards to this submission.

For any clarification on points within this submission please contact Emily Allan, Policy Planner
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Yours faithfully



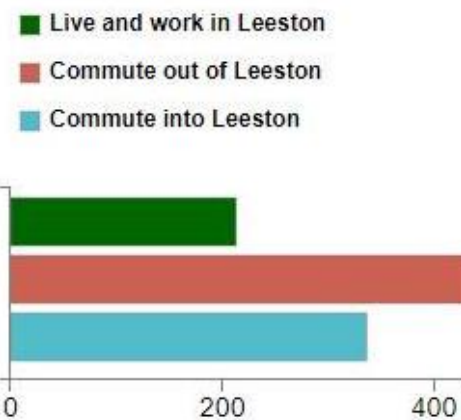
Lianne Dalziel
Mayor of Christchurch

Commuter traffic flow – Leeston.

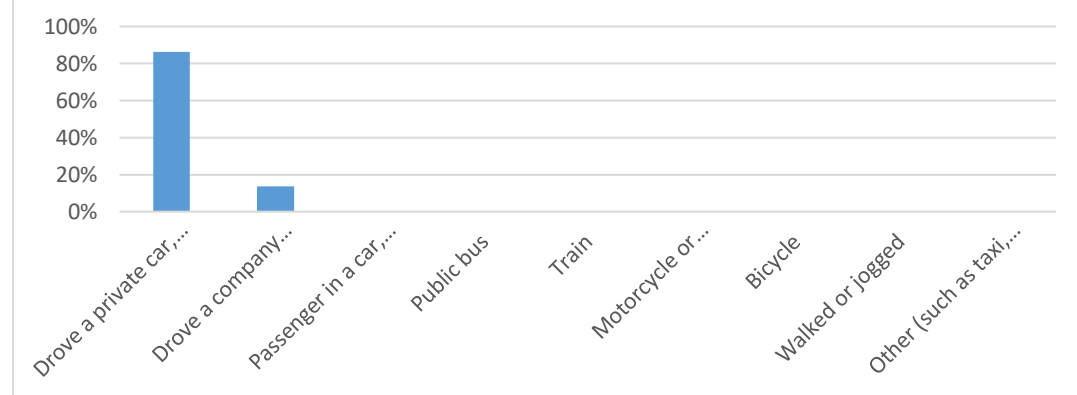
Source: Statistics New Zealand website based on 2013 census data.



Commuting flows, 2013



Transport Mode of Leeston Commuters



Destination of Leeston Commuters

