

Notice of Submission on Proposed Plan Change 62

Resource Management Act 1991 - Form 5

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This is a submission on proposed Plan Change 62

We are neutral to the application. The specific part of the application that our submission relates to is the proposed rezoning of 31.2 ha of Rural (Outer Plains) zoned land. Environment Canterbury strongly encourages a thorough assessment of the suitability of this land for residential development in light of the direction contained within the Canterbury Regional Policy Statement and the proposed National Policy Statement for Highly Productive Land (pNPS-HPL).

The reasons for our submission are:

Canterbury Regional Policy Statement Direction

There are various directions in the Canterbury Regional Policy Statement (CRPS) that seek that development is located and designed in way that achieves consolidated and co-ordinated urban growth that integrates with the provision of infrastructure. The provisions in the CRPS relevant to this submission are in Chapter 5, Land-Use and infrastructure, for development in areas outside of Greater Christchurch.

The relevant provisions are:

- a) Objective 5.2.1 which seeks that development is located and designed so that it functions in a way that achieves consolidated, well designed and sustainable growth, primarily in and around existing urban areas, and that rural activities are enabled to support the rural environment including primary production;

- b) Policy 5.3.1 which requires rural residential development to occur in a form that concentrates, or is attached to, existing urban areas and promotes a co-ordinated pattern of development.
- c) Policy 5.3.2(1) which seeks to enable development which ensures that adverse effects are avoided, remedied or mitigated, including where these would compromise or foreclose options for accommodating the consolidated growth and development of existing urban areas; and the productivity of the region's soil is valued for existing or foreseeable future primary production use.
- d) Policy 5.3.12 which seeks to maintain and enhance Canterbury's overall rural productive economy in areas which are valued for existing or foreseeable future primary production.

Rezoning the parts of proposed Private Plan Change 62 (pPC62) that are currently zoned Outer Plains Rural could have the effect of irreversibly foreclosing the productive use of this land. The application acknowledges that rural land is a finite resource and that this area has been identified in the Ellesmere Area Plan as having high quality soils. The application notes that this part of the Outer Plains zoned area has been identified for possible future development in the Ellesmere Area Plan, but this identification lacks any thorough analysis compared with the advantages and disadvantages that have been identified for areas LEE1 to LEE 4.¹

It appears that the Outer Plains area subject to pPC62 has been signalled as a possible growth area for the future but that an RMA process would be required to determine its suitability. The Ellesmere Area Plan (adopted in September 2016) concludes that there is sufficient residential land available to meet the projected growth for Leeston out to 2031 and that it is currently not necessary for the Council undertake an assessment of this area.

Proposed National Policy Statement for Highly Productive Land

The Rural Outer Plains area subject to pPC62 is identified on Canterbury Maps as Land Use Capability Classes 1 & 2 using the New Zealand Land Resource Inventory data set from Manaaki Whenua Landcare Research. This means that the area would likely be identified as highly productive under the pNPS-HPL. There is an exemption in the pNPS-HPL for areas that have been identified as future urban zones in district plans, but the identification of this area for possible future growth in the Ellesmere Area Plan would not meet that threshold. The Ellesmere Area plan is a non-statutory document that hasn't been tested through an RMA process.

The pNPS-HPL seeks to maintain the availability and productive capacity of highly productive land for primary production. There is provision for urban development on highly productive land within the proposed NPS, but this is only in circumstances where there is a shortage of development capacity to meet demand and it is demonstrated that this is the most appropriate use of land.

The pNPS-HPL has not been finalised or gazetted so Environment Canterbury does not wish to predict the outcome of consultation on this document or the finalised content. It does,

¹ Ellesmere Area Plan, p28

however, provide a strong indication of the potential national requirements for the protection of highly productive land and pPC62 should be considered in light of that.

The decision we would like the Council to make is:

To require a thorough assessment of whether it is appropriate to re-zone the Rural Outer Plains zoned land subject to pPC62 for residential development in light of the direction contained within the CRPS and pNPS-HPL. Environment Canterbury does not wish to foreclose the use of this land for residential development in the future but requests that an appropriate analysis is undertaken through an RMA process, either through this Private Plan Change application or more appropriately through the Selwyn District Plan review, to determine the outcome of re-zoning this area of land.

We do not wish to speak in support of our submission.

A handwritten signature in black ink, appearing to be 'AP' followed by a long horizontal stroke.

Andrew Parrish

Planning Section Manager

(Authorised under delegated authority from the Canterbury Regional Council)

Date: 19/02/2020