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Christchurch City Council submission on the Private Plan Change 64 Request to rezone land from Rural Inner Plains to Living Z, Farringdon, South Rolleston.

Introduction

1. Christchurch City Council (the Council) thanks Selwyn District Council for the opportunity to provide comment on the Application for Private Plan change – Farringdon (South Rolleston). The request seeks to rezone approximately 83.9 hectares of land, which would result in the ability to provide for 997 residential allotments comprising 589 in the south west block and 408 in the south east block.

Summary

2. Our Submission addresses:
 - a. The potential wider transport effects on Christchurch City;
 - b. Residential density;
 - c. Versatile soils; and
 - d. 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 anticipated density for development opportunities to provide for a compact and sustainable urban form.
4. The Council seeks a funded and implemented public transport system to service the site prior to any residential development that provides an economically sustainable attractive alternative relative to private vehicle travel. Council also seeks that, as stated in Our Space 2018-2048, an assessment of the downstream effects from the development on the Greater Christchurch transport network, is undertaken.
5. The Council seeks a minimum level of density for the development of 15 households per hectare, and that relevant recommendations of the Greater Christchurch Density Review be incorporated in the Plan Change.
6. The Council seeks that, as stated in Our Space 2018-2048, further more detailed assessment of the impact on versatile soils from development in this area, and how to mitigate the impact, is undertaken.

7. The Council seeks that the relevant recommendations of the Greater Christchurch Social and Affordable Housing Action Plan be incorporated in the Plan Change.

Transport

8. 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.
9. Objective 3 of the NPS-UD anticipates that the urban environment is either in or near a centre zone with many employment opportunities, is well serviced by public transport or is an area in high demand for housing relative to other areas in the urban environment. It is unclear how the request meets any of these requirements. The site is primarily residential in nature with low employment opportunities, on the outskirts of Rolleston township. There are poor public transport services provided, as identified in the traffic assessment, with no current or planned infrastructure upgrades identified to fund and increase public transport services. No evidence has been provided in the request to support the site as being in higher demand for housing opportunities than other rural land available in Rolleston, especially closer into Rolleston township and employment opportunities.
10. The application does not address the difference between accessibility through public or active transport, and car based connections to employment. As mentioned before, 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 almost 90 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.
11. The integration of transport and land use in Objective 6.2.4 of the Canterbury Regional Policy Statement (CRPS) provides clear direction that new settlements in the Greater Christchurch region are planned in a way to reduce dependency on private motor vehicles, reduce emissions, manage network congestion and promote active and public transport modes. The lack of an integrated public transport system to service the development and the high percentage of residents who work or go to school in Christchurch would result in the development likely being contrary to Objective 6.2.4 in the CRPS.
12. 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).
13. This action was agreed to by Selwyn District Council as a partner to the GCP. The request does not adequately assess the downstream effects on the Greater Christchurch network, as

required by this action. Without a funded and established public transport network to service the site, it is likely that this development will impact on the ability of the Council to manage the downstream transport network.

14. An Integrated Transport Assessment (ITA) by Carriageway Consulting dated 12 December 2019 has been provided with the request as Appendix B. In point 8.2.2 of the ITA it states:

“It is anticipated that the roads within the ODP areas will meet the Council’s standards for new roads, including the provisions of footpaths and cycling infrastructure **where necessary**” (ITA page 26 – emphasis added). Providing active transport modes only ‘where necessary’ will limit the connections needed across the development area to enable maximum uptake in use.

15. The ITA also states in point 3.3.1 that:

“Certain of these [referring to existing footpaths] are sufficiently wide to accommodate a shared walking and cycling path, although there is presently no signage to indicate shared use.” (ITA page 11). The lack of signage for a shared pathway will limit the use of this infrastructure.

16. With a disjointed approach to new active transport infrastructure as identified in point 8.2.2 and the lack of signage for existing infrastructure identified in point 3.3.1 of the ITA, Council raises concern that the development will not encourage active transport modes.

17. The ITA assessed the extent of the existing public transport services for the development area and stated in 5.2.2 that:

“The extent of public transport services is largely dependent upon the number of potential passengers in an area, which in this case is currently minimal. As the extent of residential development increases then the number of potential passengers will also increase, and this means that it is likely that bus services could be extended. At present though there are no scheduled bus services in the immediate area.” (ITA page 17). The lack of existing or planned public transport services for the development site raises concern to Council.

18. The Statistics New Zealand 2018 Census data identifies that for Rolleston North West, 1,941 (86%) of people leave for work or school. Of these, 786 people travel into the Christchurch City Council rohe which equates to approximately 40%. The Statistics New Zealand 2018 Census data identifies that for Rolleston South West, 1,311 (71%) of people leave for work or school. Of these, 552 people travel into the Christchurch City Council rohe which equates to approximately 42%. For both Rolleston North West and South West the primary mode of transport is private car, truck or van.

19. The further information response provided by Mr Carr on 20 August 2020 identifies two reasons to support the position that the traffic generated by the development of the plan change area will not give rise to any adverse efficiency-related effects on the wider roading network. These reasons are that as distance from the plan change area increases, the traffic effects become more dispersed as drivers have an increasing choice of possible routes, and that Selwyn has experienced an increase in employment opportunities. However, these reasons do not account for the data from the 2018 census which identified Christchurch as the destination for work and school for approximately 40% of residents from Rolleston

North West and South West. The route variations and subsequent dispersal of traffic will be determined by the most efficient routes available to move between these two destinations, which will vary over time as congestion and journey times increase along the most efficient routes. The movement of people needs to be considered in the context of use, as general dispersal does not account for the large percentage of the population moving between two set destinations. Additionally, the economic growth opportunities in Selwyn have increased as a percentage over time although Christchurch City continues to provide the predominant employment opportunities in the region. In 2018 the rate of employment growth from the previous year was 5.3% for Selwyn and 3.2% for Christchurch. This growth needs to be put in the context of the population growth, as according to Stats NZ population estimates, during this time population growth in Selwyn was growing at 6%, whereas in Christchurch City it was growing at 1.5%. Therefore employment growth in Selwyn did not keep up with population growth, whereas employment growth in Christchurch is higher than population growth, indicating that some new Selwyn residents may be seeking employment opportunities in Christchurch City.

20. 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. This has been reinforced with the emphasis in the NPS-UD to build urban environments that are resilient to the likely current and future effects of climate change.
21. 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.
22. 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 Greater Christchurch Partnership have adopted the Regional Mode Shift Plan to support this. New urban growth areas and development should be of a form which enables viable public transport services. The appropriate urban form, and provision for public transport in new urban growth areas and development, is critical in achieving those outcomes.
23. The Council seeks a funded and implemented public transport system to service the site, including connections to Christchurch City, prior to any residential development.

Density

24. The plan change request is only intending to provide 12 households/hectare. The Council has previously sought 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. In response to this the GCP has commissioned a technical report on density to achieve the agreed actions in Our Space. This report will provide direction on the appropriate level of density in the Greater Christchurch area includes minimum density requirements. 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.

25. Council also has concern at the land capacity assessment included with the request which discounts zoned vacant land which is not yet on the market. While land banking can disrupt immediate land availability, capacity assessments forecast over the short, medium and long term to determine feasible land supply and demand. To remove land from this assessment due to current market decisions undermines the long term nature provided for in capacity assessments.

The value of rural production land

26. 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.
27. The request proposes the rezoning of rural land to residential land, although concludes that the extent of land to be rezoned is insignificant comparatively to the amount of rural land available in Selwyn. However, this does not address the cumulative effects of the fragmentation of rural land.
28. 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.
29. Objective 8 of the NPS-UD anticipates that urban environments are resilient to the current and future effects of climate change. Protecting highly productive land in proximity to the Christchurch City is essential for achieving this objective.
30. The Council acknowledges that the proposed sites for development have been identified by Selwyn District Council as possible future development areas. To enable development in this location, an amendment to the CRPS Map A is being considered, but not yet notified. This plan change request has been initiated prior to the signalled statutory process required to amend Map A in the CRPS.
31. *Our Space 2018-2048 (Greater Christchurch Settlement Pattern Update - Whakahāngai O Te Hōrapa Nohoanga)* states that:
- “Further more detailed assessment of these future growth areas will be required, and undertaken as part of district plan reviews, and can address any new requirements relating to managing risks of natural hazards and **mitigating impacts on versatile soils**” (Our Space, Page 37 – emphasis added).
32. Council seeks that this further more detailed assessment of the impact on versatile soils from development in this area, and how to mitigate the impact, is undertaken.
33. If the Canterbury region is to become carbon neutral, providing for highly versatile and productive land in proximity to the city is essential.

Social and Affordable Housing

34. The GCP 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

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

Thank you for the opportunity to provide this submission.

For any clarification on points within this submission please contact Emily Allan, Policy Planner, at emily.allan@ccc.govt.nz

Yours faithfully



Lianne Dalziel
Mayor of Christchurch