

Notice of Submission on Proposed Plan Change 64

Resource Management Act 1991 – Form 5

Name of submitter: Canterbury Regional Council (Environment Canterbury)

Physical address: 200 Tuam Street, Christchurch, 8011

Address for service: Canterbury Regional Council
PO Box 345
Christchurch 8140

Contact person: Tammy Phillips

Email: tammy.phillips@ecan.govt.nz

Telephone: 027 597 2874

This is a submission on proposed Plan Change 64.

Environment Canterbury neither supports nor opposes the application. Should the rezoning be approved Environment Canterbury encourages the Council and the applicant to incorporate measures that support the issues identified in the future development strategy for Greater Christchurch, *Our Space 2018-2048: Greater Christchurch Settlement Pattern Update - Whakahāngai O Te Hōrapa Nohoanga (Our Space 2018-2048)* and more fully implement the land use and transport integration aspects of the Canterbury Regional Policy Statement. In particular, to consider how the development can better support identified housing needs and enable the timely provision of public transport through the site.

The reasons for our submission are:

Our Space 2018-2048 was endorsed by the Greater Christchurch Partnership in June 2019 and subsequently adopted by each partner council, including Environment Canterbury and Selwyn District Council. It is the future development strategy for Greater Christchurch as required by the National Policy Statement on Urban Development (NPS-UD, and at that time the NPS Urban Development Capacity).

Actions in Section 6.2 of *Our Space 2018-2048* included:

- Work with Government and social and affordable housing providers to better address current and future housing needs across Greater Christchurch, developing an action plan to increase provision (Action 2).
- Undertake an evaluation of the appropriateness of existing minimum densities specified in the Canterbury Regional Policy Statement (Action 3).

Technical reports recently prepared for the Greater Christchurch Partnership (but not yet adopted) to implement Actions 2 and 3 make recommendations on how partner councils can encourage more affordable housing and supports a view that on a case-by-case basis higher net densities could be achieved and deliver greater overall outcomes.

As outlined below, to be considered as a 'significant' development proposal attention to meeting identified housing needs is a relevant criterion for such a plan change request.

Canterbury Regional Policy Statement (CRPS) Direction

Chapter 6 (Recovery and Rebuilding of Greater Christchurch) seeks that development is located and designed in way that achieves consolidated and coordinated urban growth that integrates with the provision of infrastructure.

The two development blocks comprising the plan change request are located within the projected infrastructure boundary shown on Map A within Chapter 6 but are not identified as Greenfield Priority Areas (GPAs). The plan change request is therefore considered to be inconsistent with the land use and infrastructure framework of Objective 6.2.1 (3) which *"avoids urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS"*.

However, Environment Canterbury acknowledges that it is currently preparing to notify a Proposed Change to the CRPS to include the Future Development Areas (FDAs) identified in *Our Space 2018-2048*, along with an associated policy provision linking future zoning of FDAs to development capacity shortfalls identified in housing and business capacity assessments. Environment Canterbury also accepts that planning decisions must also give effect to the NPS-UD gazetted in July 2020. Policy 8 of the NPS-UD requires local authorities to be responsive to unanticipated or out-of-sequence plan change proposals and give particular regard to proposals that would add significantly to development capacity and contribute to well-functioning urban environments.

Environment Canterbury is currently working with local councils to develop criteria to be inserted into the CRPS (to meet Policy 8 Part 3, subpart 2, clause 3.8(3)) in relation to determining what plan changes will be treated as adding significantly to development capacity. To assist local authorities the Ministry for the Environment released guidance

on this matter in September 2020¹. As well as the scale of a development proposal this guidance identifies fulfilling identified demand as a factor that would influence an assessment as to its significance (including citing gaps in the supply of certain types of housing such as affordable houses, provision for higher densities and a range of housing typologies). These are housing needs identified in the most recent capacity assessment prepared for the Greater Christchurch area.

Environment Canterbury considers that for the plan change request to be considered as delivering significant development capacity under Policy 8 of the NPS-UD, greater attention to such housing needs is necessary.

Public Transport

Environment Canterbury also has concerns relating to how the plan change request coordinates staging, both within the internal areas of each development block and between adjacent development sites, to ensure that effective public transport access can be provided and maintained.

Both ODP Area 14 and ODP Area 15 show connections across the development blocks extending the existing Northmoor Boulevard west to Goulds Road and east to Springston Rolleston Road. A link north to Faringdon Boulevard is also shown in ODP Area 15, however the connection requires passage through an adjacent site (Lot 2 DP82966, 435 Springston Rolleston Road) that is not part of the plan change request and is not currently being developed. As Faringdon Boulevard represents the primary route through the Faringdon development towards Rolleston town centre this could represent a serious disconnect for servicing the site with public transport for some time.

Policy 6.3.2 (3) of the CRPS requires *“emphasis at a local level placed on walking, cycling and public transport as more sustainable forms of transport”*. Policy 6.3.3 (7 and 8) requires *“staging and co-ordination of subdivision and development between landowners”* to be set out and to *“demonstrate how effective provision is made for a range of transport options including public transport”*.

Without a clear mechanism to deliver the connection to Faringdon Boulevard in a timely manner Environment Canterbury would not view the plan change request as meeting the above policies or the wider transport network and land use integration outcomes sought by Objective 6.2.4 and Policies 6.3.4 and 6.3.5. If this cannot be addressed by the applicant the Council could consider using the Public Works Act to acquire land necessary to construct the link to Faringdon Boulevard.

Furthermore, should the plan change request be adopted, liaison between the developer and Environment Canterbury public transport operational staff when

¹ <https://www.mfe.govt.nz/publications/towns-and-cities/understanding-and-implementing-responsive-planning-policies>

preparing detailed plans for public transport access is advised, with adherence to the public transport guidelines developed with Selwyn District Council (attached to this submission).

The decision we would like the Council to make is:

1. To give careful consideration through the hearing process and the section 32 analysis to the nature of residential development proposed for the sites in order that it could be justified as delivering significant development capacity for the District. In particular, that housing densities and typologies are appropriate and linked to housing needs identified in the capacity assessment collaboratively prepared by councils in the Greater Christchurch area.
2. To give careful consideration through the hearing process and the section 32 analysis to appropriate mechanisms that ensure timely and effective public transport access to and through the site. In particular, that the primary public transport link to Faringdon Boulevard to the north is expedited to enable public transport services at the earliest opportunity.

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

A handwritten signature in black ink, consisting of a stylized 'A' followed by a long horizontal stroke.

**Andrew Parrish
Planning Section Manager**

(Authorised under delegation from the Canterbury Regional Council)

Date 19/11/2020



Providing for Passenger Transport within Your Subdivision

The Metro Public Passenger Transport network in Canterbury has recently been rated as one of the best in Australasia. This network currently operates between Christchurch, Templeton, Rolleston, Burnham, Prebbleton and Lincoln. As communities grow and as funding provides, it is anticipated that these services will continue to expand.

Ensuring that your subdivision is Passenger Transport friendly (future proofing) will enable Selwyn residents to access future opportunities that may not exist today. If applied in conjunction with the planning and design of any new residential subdivisions, the following factors will help create a successful Passenger Transport system.

The Roding and Pedestrian Network

Road Construction	Potential Passenger Transport corridors should be suitably engineered for buses, including roads and streets of sufficient pavement strength and appropriate layout to accommodate buses.
Road Width	Buses are approximately 2.5 metres wide, so roads and individual bus stops along potential Passenger Transport routes need to provide for this. More space is needed at intersections and in other areas to allow buses to turn and manoeuvre safely.
Road Layout	Simple, direct, logical roading patterns are required for bus routes with no obstructions that could restrict bus movements. Footpaths should be provided on at least one side of the road coinciding with bus stop positions.
Permeability	Pedestrian and cycle corridors should be provided to, from, within and between subdivisions so residents can easily access bus stops and facilities.
Integration	Future new main roads and streets should be aligned to enhance connectivity between subdivisions and allow public transport provision.
Walking Radius	Defined bus stops should be provided so all dwellings and residents are within 400m of a bus stop.
Safety	Bus stops should be located and designed so that they can be safely accessed by buses and passengers. Opportunities to provide future seats and shelters should also be considered.

Housing Density

Medium to high density residential subdivisions, like those typically occurring in Selwyn townships, are the prime candidates for the future provision and integration of public transport, compared to lower density rural residential subdivisions. Higher density housing provides more potential patronage increases which reduce service costs. Frequency can then be improved, which in turn makes the service more attractive to use.

Location of Facilities

Community facilities should be located adjoining Passenger Transport routes, for example:

- A retirement village, complex, stand alone retirement villas or over 60s units,
- A community node, such as shops, businesses, commercial activities or health facilities,
- A school,
- A park, or
- High-density residential areas

For specific information and advice on how to provide for public transport during the planning or design of any subdivision please contact the Passenger Services Operations Planner at Environment Canterbury. They can be contacted through Metroinfo on 366 8855. Alternatively, contact the Selwyn District Councils Service Delivery Department on 324 8080 for information on the overall engineering development approvals, including the provision of public transport requirements.