

**BEFORE HEARING COMMISSIONER
FOR SELWYN DISTRICT COUNCIL**

UNDER the Resource Management Act
1991

AND

IN THE MATTER of Private Plan Change
68 at Prebbleton

APPLICANTS Urban Holdings Ltd,
Suburban Estates Ltd, Cairnbrae
Developments Ltd

Summary of Section 42A Report of Jonathan Clease (Planning)

Dated: 23 March 2022

Introduction

1. My full name is Jonathan Guy Clease. I am a Consultant Planner at Planz Consultants Ltd in Christchurch and my qualifications and experience are set out in my original section 42a report.
2. This statement summarises my s42a report. It also responds to the matters raised in evidence by the applicant’s team, and planning evidence provided by Mr Marcus Langman on behalf of CCC and CRC and Mr Nick Williamson on behalf of eight submitters.
3. Consideration of this plan change takes place in a context of there being a relatively complex overlapping series of strategies, CRPS, NPS, and recent legislative changes.
4. PC68 in essence looks to reassess whether first there is a need for additional housing capacity in Prebbleton; and secondly if so whether the application site is an appropriate location to provide such capacity and an associated new southwestern edge to the township.
5. In answering these two questions it is necessary to assess both the on-the-ground effects of the plan change, and the alignment of urban growth in this location against the wider policy framework.

Policy Framework

6. At the outset I readily acknowledge that consideration of the hierarchy of statutory planning documents and resolution of any real or perceived inconsistencies or tensions between them are as much legal interpretation rather than planning matters. My consideration of the framework is from the perspective of a planning practitioner and is mindful of the recent findings on the framework made by Commissioner Caldwell on PC67¹ and PC73², and the legal advice provided to Council by Paul Rodgers in relation to the urban growth topic of the Proposed District Plan.
7. Urban growth in Greater Christchurch is directed primarily by the Canterbury Regional Policy Statement (‘CRPS’) and in particular Chapter 6. The CRPS is directive and clear – urban development outside the area shown on Map A are to be avoided³. The policy framework was therefore settled prior to the National Policy Statement – Urban Development (‘NPS-UD’). If the NPS-UD did not exist, then there would be a significant CRPS policy hurdle to be overcome and any plan change would be very likely to fail to ‘give effect to’ the CRPS.
8. In my view the NPS-UD does change things – that is the purpose of a NPS i.e. to direct a change in practice and outcome. The NPS-UD reflects Parliament’s concern with housing supply and is directive in the steps necessary to help resolve some of the perceived barriers to the timely provision of new dwellings. Policy 8 in my view opens the door to consider proposals not otherwise anticipated in District/ Regional Plans. Such consideration is not however a ‘free hit’

¹ https://www.selwyn.govt.nz/_data/assets/pdf_file/0006/704931/PC67-Commissioner-Recommendation-10-January-2022-1.pdf

² https://www.selwyn.govt.nz/_data/assets/pdf_file/0011/745409/PC73-Commissioner-Recommendation-March-2022.pdf

³ CRPS Chapter 6, Objective 6.2.1(3) and Policy 6.3.1

– it appears to be common ground between myself, Mr Langman, and Ms Harte⁴ that whilst decision makers are directed to be ‘responsive’, any such growth proposals must still deliver a well-functioning urban environment, with the tests for such set out in the balance of the NPS-UD, the CRPS, and the Operative District Plan.

Interplay between the NPS-UD and the CRPS

9. It is my understanding from the evidence of Mr Langman and associated legal submissions on behalf of the CCC and CRC that in their view the CRPS has been updated such that it does give effect to the NPS-UD. I understand their argument to be that Map A of the CRPS identified sufficient capacity to meet at least short and medium term needs, and that the Future Development Areas (‘FDAs’) identified through Change 1 enable Selwyn Council to be ‘responsive’ to growth pressure by considering plan changes located within the FDAs. For landholdings outside of the FDAs, Mr Langman puts forward two procedural options available to applicants. The first is to advance a private plan change under Policy 8, albeit that the answer to any such plan change should always be ‘no’ because anywhere outside of the FDAs will not result in a well-functioning urban environment. The second option is that applicants work with Selwyn Council for the Council to then in turn take a request to the CRC to undertake a change to the CRPS.
10. If I have understood correctly, then this gives rise to two questions. The first is did Change 1 to the CRPS truly engage with, and give effect to, the need to provide guidance on the responsiveness direction in Policy 8. Secondly in the absence of any significance criteria under Policy 8, do the two pathways offered by CCC/ CRC witnesses equate to a genuinely responsive approach.
11. Turning to the latter question first, in my view it seems non-sensical to suggest that a genuine pathway is provided to implementing the ‘responsiveness’ direction in Policy 8 by enabling private plan changes to be progressed, albeit that the answer must always be that they be declined. I readily acknowledge that some plan changes on merit may well not meet the wider directions in the NPS-UD, however I consider that it remains readily plausible for appropriately located and designed sites outside of Map A to still result in a well-functioning urban environment. To conclude otherwise would mean that Selwyn townships could never grow beyond the Map A boundaries as there would always be a merit-based reason why such growth was unacceptable.
12. In terms of the second pathway, I acknowledge that such a pathway is statutorily available, however in my twenty-five years of planning practice I cannot recall it ever having been used. I further note that none of the fifteen or so private plan changes currently in process have chosen to avail themselves of this route.
13. I have reviewed the material provided by Counsel for CRC/CCC in their memorandum dated 23 March. In summary:
 - Government issued the NPS-Urban Development Capacity in 2016. This NPS had a focus primarily on housing (and business) capacity.
 - In response to the NPS-UDC, the Greater Christchurch Partnership undertook the ‘Our Space’ exercise under the LGA;

⁴ I note that whilst Mr Williamson provided planning evidence, he did not include any assessment of the NPS-UD

- Our Space found at the time that there was a risk of a medium term shortfall in capacity in both Selwyn and Waimakariri Districts. The need to update Map A of the CRPS to provide additional capacity was one of the actions that came out of the Our Space process;
 - Change 1 was then developed, however prior to it being finalised the Government issued the NPS-UD in July 2020, with this later NPS replacing the earlier NPS-UDC;
 - The Change 1 process was then paused to enable a review of the NPS-UD;
 - The report to the Minister ('the Minister Report')⁵ sets out the scope and focus of Change 1.
14. From my review of this report (and also my recollection at the time Change 1 was developed), the scope of Change 1 was focused on ensuring that sufficient short-medium term capacity was available. The Minister Report is explicit that⁶ *“the purpose of the Proposed Change is to give effect to Policy 2 and Clause 3.7 of the NPS-UD and enable sufficient land in Greater Christchurch to be rezoned for the medium term (10 years) and identified for the long term (30 years) to meet the needs of existing and future communities, by identifying and enabling additional development capacity for housing in greenfield growth areas within the Projected Infrastructure Boundary shown on Map A in Chapter 6 of the CRPS, in Rolleston, Rangiora and Kaiapoi.*
15. In short, Change 1 had a focus solely on whether, in CRC’s view, sufficient short and medium term capacity was provided, as required by the NPS-UD Policy 2.
16. This narrow focus was then reinforced by the Minister’s Report findings on submission scope. The only changes to policies notified in Change 1 were incidental text updates to make provision for FDAs. The Minister’s Report was explicit that submissions seeking any further review or amendment to policies were outside of the scope of Change 1⁷.
17. The Minister’s Report likewise found that any submissions seeking the inclusion of additional land within Map A, or as FDAs, were also beyond the scope of Change 1⁸.
18. The scope of Change 1 was therefore intentionally narrow in focus, with the aim of ensuring that the minimum capacity obligations set out in the NPS-UD were being met.

Significant capacity

19. NPS-UD Policy 8 sets out the ‘gateway’ tests for being responsive to unanticipated or out of sequence developments. One of these tests is that the development provides significant development capacity. Criteria for meeting the significance test are to be included in the CRPS. The issue of Policy 8 and the need for such criteria was a matter raised by submitters to Change 1. The Minister’s Report is again helpful in setting out the Change 1 response as follows⁹:
20. *We are familiar with the responsive planning policies of the NPS-UD referenced by submitters. NPS-UD Policy 8 and Part 3, subpart 2, clause 3.8 requires local authorities to have particular regard to unanticipated or out-of-sequence development proposals that would add significantly to development capacity. Environment Canterbury is currently formulating criteria in response*

⁵ Report to the Minister for the Environment on Proposed Change 1 to the Chapter 6 of the Canterbury Regional Policy Statement March 2021

⁶Ibid, paras.4 and 22

⁷Ibid, paras 56-61

⁸Ibid, paras 62-69

⁹Ibid, para. 132-133

to clause 3.8(3) to determine what plan changes are considered significant in a Greater Christchurch and Canterbury context, to be advanced through a separate RMA process. The Greater Christchurch Partnership is considering the significance criteria in the first half of the 2021 calendar year.

21. *When notified and subsequently adopted in the CRPS these provisions will clarify how NPS-UD Policy 8 will be interpreted at a regional level and determine what changes might be required to existing policy provisions, including those in Chapter 6. In the meantime, we recognise that the NPS-UD is a higher order document under the RMA and decision makers assessing plan changes will need to consider the implications of such national direction alongside the policies contained in Chapter 6. Environment Canterbury has prioritised implementation of the Proposed Change to promote FDAs that have been signalled for urban growth for some time and align with the investment programmes of councils and other infrastructure providers as this is considered the most appropriate mechanism to address any potential shortfall in development capacity. We do not consider that any amendments are required in response to submissions that consider there to be insufficient flexibility and a fixed and non-contestable rural/urban boundary, as work is underway to progressively implement the new national direction set out through the NPS-UD. This includes changes to the district plans, the completion of a new capacity assessment and future development strategy, and the CRPS review.*
22. So in short, whilst it is fair to say that the degree to which the CRPS gives effect to Policy 8 was considered through the Change 1 process, the conclusion was that such consideration was beyond the scope of Change 1 and was a matter for another day. And that in the meantime it was readily acknowledged that decision makers would need to take into account the higher order direction provided in the NPS-UD.
23. This conclusion is reinforced by the findings of the peer review. This review found that¹⁰
“In my opinion the ‘fixed non contestable boundaries’ on Map A are not, of themselves, contrary to NPS-UD. They are a fundamental component of a strategy that has been evolving over time, and Change 1 cannot be divorced from its history and context. It is part of an on-going process, with the implementation of Policy 8 still to come. To the extent that submitters are seeking a ‘responsive’ and ‘flexible’ approach by virtue of Policy 8, a touch of reality is required. NPS-UD only came into force after the streamlined planning process for Change 1 had commenced and CRC is working on that issue.
As Council has noted in response to a number of submissions on this topic, NPS-UD is a higher order document under the RMA and decision makers assessing plan changes will need to consider the implications of the national direction alongside the policies contained in Chapter 6. It is unrealistic to expect these matters to be resolved overnight”.
24. In short, because Change 1 was well-advanced by the time the NPS-UD came into being, it was readily acknowledged that further work was required. Whilst fixed boundaries might be an appropriate legacy tool, consideration of whether any amendments to this tool (or the introduction of other new policy direction and significance criteria) to ensure Policy 8 was correctly implemented was too big a task to be undertaken within the ambit of Change 1.
25. In my view the direction is therefore quite clear. Change 1 provided some additional capacity through the FDA tool. Further amendments to either the CRPS policy framework or growth boundaries were seen as matters for another day. As such Policy 8 remains very much in play in

¹⁰ Appendix 7 technical Peer Review, paras 88-89.

terms of the need for decision-makers to be responsive to out of sequence or unanticipated proposals, and to assess such on their merits. Such assessment is to be made against the balance of the NPS-UD and CRPS policy direction regarding the formation of well-functioning urban environments i.e. a merit-based assessment.

26. As a final note on 'significant development capacity', I was surprised that Mr Langman does not consider the addition of over 800 new households to be 'significant' for the purpose of Policy 8. The addition of 800 new houses to Prebbleton constitutes an approximate 30% increase in the size of the town. Even taking a broader view of the capacity provided across the wider District, 800 houses is two thirds of the total annual demand for housing in Selwyn. Apart from Pegasus, Prestons, Wigram, and Farringdon I am unable to think of any other greenfield growth areas that have been brought to the market across Greater Christchurch in the last thirty years that would be bigger.

Capacity need

27. The NPS-UD includes a requirement for Councils to ensure that sufficient development capacity is provided. SDC, as part of the Greater Christchurch Partnership has undertaken such an assessment.
28. I am cautious that the assessment understates demand, and concurrently overstates supply for similar reasons to those set out by Mr Colegrave. Importantly, the NPS-UD requirement to provide capacity is a minimum – there is no policy hurdle to providing more capacity than what is needed, provided the location of such capacity meets the other NPS-UD policy tests regarding urban form and matters such as integration with infrastructure. So if there are questions over the adequacy of capacity, in my view you should favour on the upside.
29. I understand that the alternative view put forward by Mr Langman is that sufficient capacity is available, at least in the short-medium term. This then provides the timing window necessary to undertake a strategic reassessment of growth direction for Greater Christchurch, and to follow that up with a comprehensive review of the CRPS. And that to grant ad hoc plan changes in the interim could result in a sub-optimal form and/or result in less demand for infill housing in more preferable central locations.
30. This position of course relies first on having a high degree of confidence that sufficient capacity is both plausible and available. It also relies on a confidence that infill housing and greenfield locations and typologies are readily interchangeable and are therefore able to be substituted whilst retaining a competitive housing market. I note the evidence of Mr Colegrave and Mr Sellars regarding the local housing market and the limitations on such substitution.
31. The risk of sub-optimal outcomes is likewise moderated by the parallel NPS-UD requirements to integrate and connect proposed sites into existing urban fabric – poor urban outcomes should not pass through to approval. Whilst plan changes might deliver growth in unanticipated locations, such growth should therefore still be appropriately designed, serviced, and integrated with adjacent urban areas such that the end outcomes will remain acceptable. Such outcomes are also necessarily placed in a wider context of a 'housing crisis' whereby Parliament expects to see a timely response.

On-the-ground effects

32. In terms of the on-the-ground effects, CRPS Chapter 6 provides a comprehensive suite of policies that provide the criteria or conditions for appropriate urban growth locations. My s42a report has assessed these matters against the CRPS policy framework and has found as follows:

- a. The site does not contain any identified Outstanding Natural Landscapes, Significant Ecological Areas, or wetlands¹¹;
- b. The site does not contain any identified sites of cultural or heritage value¹²
- c. The site is suitable from a geotechnical perspective, and is not subject to unacceptable liquefaction, flood hazard, or ground contamination risks that cannot be appropriately managed through the subdivision process and associated bulk earthworks¹³;
- d. The site is able to be serviced by 3-waters infrastructure, with stormwater disposed of to ground and reticulated services available for potable water and sewage, subject to localised upgrades that can be implemented through the subdivision consent process. I note that no parties have provided technical expert evidence challenging the ability of the site to be serviced or identifying any site characteristics that would preclude it being developed to suburban densities¹⁴;
- e. The site is currently constrained in terms of localised roading infrastructure. These constraints will be resolved once programmed upgrades to four nearby intersections have been undertaken. Mr Collins has recommended that the plan change be subject to a staging rule to cap the number of new occupied dwellings at 120 until these intersection upgrades are in place. The Shands/Trents intersection in particular requires a 2-lane roundabout to ensure sufficient levels of service are provided, with the funding of the second lane a matter to be secured via a developer agreement with Council. The site is well located for pedestrian and cycle connections into the balance of Prebbleton and cycleways linking Prebbleton with Lincoln. Mr Collins has recommended that the ODP be amended to make explicit the need for a pedestrian and cycle connection along the Trents and Hamptons Road frontages to connect the site back into the existing suburban area to the east of the site. Public transport bus services are available in Prebbleton, however current bus stops are at the outer edge of what might be considered walkable. The ODP layout does not preclude the ability to run future bus services through the site spine roads should the future housing provide sufficient support for new services¹⁵;
- f. The site does not threaten the safe and efficient functioning of regionally significant infrastructure¹⁶;
- g. The site currently displays landscape values that are similar to much of the Inner Plains i.e. a pleasant pastoral landscape that is a mix of dwellings, farm accessory buildings, shelterbelts, and amenity plantings. The shift to a suburban outcome will unquestionably result in landscape change. Suburban areas in Prebbleton have been developed to a high standard, such that they provide a pleasant level of amenity and streetscape quality, albeit that the landscape is different from a more extensive pastoral setting. In my view there is a change in landscape, however the

¹¹ CRPS Chapter 6, Objective 6.2.1(4), (5)

¹² Ibid Objective 6.2.3(2), (3)

¹³ Ibid, Objective 6.2.1(8)

¹⁴ Ibid, Objective 6.2.1 (9), (11), Policy 6.3.5

¹⁵ Ibid, Objective 6.2.1(9), (11), Objective 6.2.4, Policy 6.3.4

¹⁶ Ibid, Objective 6.2.1(10)

resultant future environment should still be pleasant and will provide an acceptable level of amenity commensurate with a small rural township¹⁷;

- h. The site is subject to an Outline Development Plan and associated narrative that identifies key features and design outcomes¹⁸;
- i. The ODP delivers an appropriate yield of at least 10 households per hectare (12 hh/ha proposed), and provides for variety in dwelling sizes and typologies¹⁹.

33. I am therefore comfortable that there are no on-the-ground issues or effects that would preclude the plan change from proceeding.

Urban Form

34. Prebbleton, like the other Inner Plains townships, has undergone rapid change and growth over the last decade or so. The existing urban form and mix of densities of Prebbleton reflects this rapid growth and change.

35. The Commissioner engaged with Mr David Compton-Moen regarding the planning philosophy of arranging rural townships with a density transition from suburban character in the centre, through to larger lots on the periphery and then rural farmland beyond. In my experience such an arrangement can work well in low growth environments, where the density transition essentially forms an 'end state' to the township in question.

36. Where the township is subject to high rates of growth such an arrangement however becomes problematic. Large lots in effect act as a 'moat' around the town, and either limit growth with consequent implications for housing supply and affordability, or force growth to leapfrog, thereby leaving a strip of larger lots in what ultimately become more central locations.

37. The Kingcraft Drive area to the north of the PC68 site is a good example of this. This area is comprised of 1ha (approximately) blocks. It was developed in the 1990s at a time when growth rates in both Prebbleton and indeed the wider Selwyn District were relatively low. It effectively limits higher yielding suburban growth to the northwest of Prebbleton.

38. The potential for large lot development to preclude future growth options was readily acknowledged in the Rural Residential Strategy 2014 ('RRS-14'). Indeed, one of the key criteria for identifying Rural Residential locations was that they would not preclude or frustrate township growth i.e. that they were in locations where they would form the long term end-state edge of the township. For this reason Area 7 in the middle of the PC68 site was NOT identified in the RRS-14 as notified, as its location would potentially frustrate or preclude township growth. The landowners of the Area 7 block provided submissions on the RRS-14 process and satisfied the decision makers at the time that identification of Area 7 was appropriate, provided that area was designed in such a manner that it could readily transition to higher densities in due course. The RRS-14 recognised that the logical future growth path for Prebbleton was out to Shands Road, with Hamptons Road forming the southern border.

39. The shape/ site boundaries of the application site reflect the landholdings of the parties to the plan change. As such the proposed zone edge is somewhat disjointed and results in several gaps or relatively small rural areas that will be largely bounded by suburban activities. The irregular shape of the plan change area is not ideal, however it does not present a hurdle or effect that

¹⁷ Ibid, Objective 6.2.3 (1)

¹⁸ Ibid Policy 6.3.3

¹⁹ Policy 6.3.7

is so adverse that the plan change should be declined. A number of submitters around the edges of the plan change have sought that in the event that the plan change is approved, that their (and in some cases their neighbours) blocks are also included. Such submissions raise issues of both scope and merit.

40. As set out in my s42a report, Council's general approach to such submissions on private plan changes is to not accept them on scope grounds, with natural justice issues being the primary concern i.e. had other parties known additional land might be included in the plan change then they might have submitted. As set out in my report, in this specific instance I consider such natural justice risk to be low for the Tents Rd 'gap' and for the Shamy property to the west. I likewise consider that there would be merit in including these areas in terms of urban form.
41. I note that the submitters on the corner of Trents and Shands Road (submitters 006, 0030, and 0032) did not seek that their land be included and as such in my view there is simply no scope available to consider the inclusion of these combined titles. I note from the presentation of Mr Chen that at least some of these owners have changed their minds since their submissions were lodged. They equate to over 6ha of land which in my view is too large an area to include as a consequential amendment. I nonetheless agree that in terms of merit there do not appear to be any insurmountable servicing issues with their inclusion and that ultimately the inclusion of all the land out to the Trents/ Shands/ Hamptons Road edges has merit in terms of urban form.
42. Two small landholdings on the northern side of Hamptons Road are sufficiently small that in my view they could be included as consequential amendments. Since writing my s42a report Council asset managers have confirmed that the Council-owned lot on the northeastern corner of Shands/ Hamptons Roads has been acquired by Council to facilitate the installation of a roundabout at this intersection. As such the majority of this lot is to be taken up by road infrastructure within the next couple of years. There is likely to be a small balance area around the margins of the road reserve that could be incorporated into a future residential development (rather than remain as a small sliver of rural zoned land) and as such inclusion within the plan change has merit. The same is true for the other small landholding further south along Hamptons Road where the size of this lot is commensurate with a large suburban section.

The 'Enabling Act'²⁰

43. In line with the direction given by the recent report to Council²¹ and associated Selwyn Council resolution, the expectation is that Commissioners will make their recommendations on private plan changes based on the merit of the plan change as notified. How the plan change is then taken forward and dovetailed with the Proposed District Plan process and the implementation of the Enabling Act is an issue for Council to progress.
44. If the recommendation is that the plan change be accepted, Council will roll the plan change into the wider variation to the Proposed District Plan under an Intensification Planning Instrument ('IPI') process which will cover the three main townships of Rolleston, Lincoln, and Prebbleton. The IPI process will identify the applicability of any qualifying matters and infrastructure implications. Such considerations and the implications of enabling medium density outcomes in Prebbleton are equally relevant across all of the existing operative residential zones.

²⁰ Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021

²¹ https://www.selwyn.govt.nz/_data/assets/pdf_file/0020/740108/2022-02-23-Council-Report-Variation-EHS-FINAL.pdf

45. I note that if sufficient scope does not exist in terms of the various submitter blocks discussed above, then Council does have the opportunity to include such blocks through the variation process (or submitters can seek for their land to be included via submissions).
46. As a final note on the Enabling Act implications, in my view they will generally take the form of 'style over substance' in regard to Selwyn's context. It is important to emphasise that the Enabling Act simply enables higher density forms of housing – it does not require or mandate it. As such it is entirely up to the market to determine the degree to which these opportunities are taken up. Greenfield growth areas in Selwyn have been subject to the Living Z Zone provisions for a decade or so. The Living Z rules require a minimum yield to be achieved rather than a maximum. This is because the market in Selwyn has long leaned towards low density/larger sections being preferred, and therefore minimum yield requirements were included in the Living Z rule framework to ensure land was being used efficiently.
47. The Living Z rules provide for medium density housing (outside of any areas identified for such on an ODP) as a discretionary resource consent. If such areas are designed in a comprehensive manner, and are consented whilst the growth area is still under development i.e. do not have established immediate residential neighbours, then in my experience such consents are relatively easy to achieve. Despite a straight-forward consenting pathway being available, uptake of this opportunity has been limited, and where it has occurred the typologies tend towards smaller detached homes on individual sections rather than terraced or low-rise apartments.
48. As such, my experience as a planner aligns with the observations made by Mr Sellars regarding market demand for housing in Selwyn and the likelihood that end outcomes under either Living Z or the proposed new Medium Density Residential Zone will not in reality be materially different.

Conclusion.

49. The PC68 ODP, subject to the amendments confirmed in the proponent's evidence, and subject to the amendments to address the matters raised by Mr Collins, provides an appropriate development framework. Further to Mr Collins evidence I consider that the need for a cap on house numbers prior to roading upgrades is a critical matter that needs to be implemented via a consequential new rule, with a non-complying activity status, rather than simply a note in the ODP narrative.
50. Overall I consider the plan change to make a positive contribution towards a well-functioning urban environment. This contribution would be strengthened with the inclusion of several submitter properties (subject to scope). If sufficient scope does not exist, then whilst far from optimal, I do not consider the site boundaries to be so flawed as to warrant the plan change being declined. The resultant form with several 2ha lifestyle blocks bounded by suburban neighbourhoods is consistent with the existing form of Prebbleton, especially to the north of the site where there is a wide range in section sizes and where larger lots are likely to be gradually infilled over time.
51. The site is well-placed as a logical expansion of Prebbleton township and are no on-the-ground issues that would warrant the plan change being declined. The provision of a range of housing typologies, in an appropriate location, in my view aligns comfortably with the need to be responsive regarding the housing supply outcomes sought in the NPS-UD. The site likewise sits

comfortably with the wider urban growth policy direction provided in both the CRPS and the Operative District Plan apart from the directive urban edge policies which preceded the NPS-UD and have yet to be reviewed in a comprehensive manner.

52. I therefore recommend that PC68 should be approved.



Jonathan Clease

Consultant Planner

23 March 2022