

**BEFORE THE HEARING COMMISSIONER
FOR SELWYN DISTRICT COUNCIL**

UNDER

the Resource
Management Act 1991

IN THE MATTER

of Private Plan Change
69 (Lincoln) by
Rolleston Industrial
Developments Limited

**SUMMARY OF EVIDENCE OF MARCUS HAYDEN LANGMAN
(PLANNING EVIDENCE)**

24 NOVEMBER 2021



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CHRISTCHURCH

INTRODUCTION

1. My name is Marcus Hayden Langman. I am a Planning Consultant self employed planning consultant and have set out my experience in my evidence in chief.
2. In my evidence I address planning issues in relation to Proposed Plan Change 69 (**PC69**), including how it relates to strategic planning, the National Policy Statement on Urban Development (**NPS-UD**) and the Canterbury Regional Policy Statement (**CRPS**), in particular Chapter 6. In addition, I consider issues relating to infrastructure, groundwater and springs, transport, and how these relate to a well-functioning urban environment.
3. The key conclusions I reach are:
 - (a) PC69 should not be considered under the responsive planning provisions of the NPS-UD, as while it could be considered to add significant capacity for housing (in terms of quantum of dwellings):
 - (i) sufficient development capacity has already been identified to meet expected housing demand over the medium-term and PC69 does not go far enough to align with the housing needs stated in the 2021 Housing Capacity Assessment;
 - (ii) it is out of sequence with planned infrastructure development;
 - (iii) it would compromise opportunities for intensification elsewhere in Greater Christchurch; and
 - (iv) it would not contribute to a well-functioning urban environment that is well-connected along transport corridors.
 - (b) PC69 **does not give effect** to several key policies in the CRPS, including: 6.2.1(3), 6.2.2, 6.3.1(4).
 - (c) The provisions proposed as part of PC69 are not the most appropriate to achieve the objectives of the Selwyn District Plan, in particular Objectives B3.3.3, B3.4.5, B3.4.4, B4.3.1,

B4.3.3 and the proposed rules and Outline Development Plan are inconsistent with Policies B2.1.13 and B4.3.1

4. I have reviewed the Applicant's expert evidence and legal submissions and note the following points of disagreement:

Legal submissions

- (a) I acknowledge that the NPS-UD is later in time (as a whole) and a higher order planning document than the CRPS, but I do not agree that there is a conflict between the two documents, or that any perceived tension needs to be reconciled by reading down the CRPS;
- (b) I rely on the published capacity assessment¹ prepared by the local authorities, and involving the development sector, which sets out urban housing capacity and sufficiency for the territorial authorities. The capacity assessment is mandated by the NPS-UD and I understand it has been prepared in accordance with the requirements set out in 3.23-3.27 of the NPS-UD. Table 1 and Table 3² show a surplus of housing where Future Urban Development Areas are developed at a density of 15 households per hectare;
- (c) In relation to development being "plan-enabled" for the Future Development Areas (**FDAs**),³ I understand that this process is provided for in the review of the Proposed Selwyn District Plan, and that this may result in those areas being 'plan-enabled' in the near future.
- (d) I acknowledge that Lincoln is a key activity centre (**KAC**)⁴ however this does not impact on the need to give effect to the provisions in the CRPS, which seek to avoid new urban development outside of Greenfield Priority Areas (**GPA**s) and **FDAs**; and

¹ Ibid at para 56.

² Greater Christchurch Housing Development Capacity Assessment, 30 July 2021, page 7 <https://www.greaterchristchurch.org.nz/assets/Documents/greaterchristchurch/Capacity-Assessment-reports-2021/Greater-Christchurch-Housing-Development-Capacity-Assessment-July-2021.pdf>.

³ Legal submissions at para 58.

⁴ Ibid at para 73.

- (e) I acknowledge that private plan changes are a legitimate process for enabling urban development,⁵ however they are subject to the same statutory requirement to give effect to higher order documents, including the CRPS and NPS-UD.

Mr Fraser Colegrave

5. Mr Colegrave notes that the NPS-UD is clear that capacity must be zoned in an operative or proposed district plan to qualify as medium-term capacity, but then proposes excluding the FDAs.⁶ I understand that the FDAs for Selwyn are proposed to be zoned in the Proposed Selwyn District Plan, and therefore were properly considered as included.

Mr Paul Farrelly

6. Mr Farrelly states that the proposed plan change supports greenhouse gas emissions⁷ without attempting to quantify additional emissions from commuter travel. I find this a difficult conclusion to reach without supporting evidence. This remains a significant issue as the proposed development does not significantly increase business development for Lincoln. While Mr Farrelly notes that travel distances will be similar to other areas in Selwyn⁸, he does not consider the impact of commuter trips to Christchurch City.
7. I have not reviewed any other evidence that has altered the position expressed in my evidence, and I maintain my position set out in my evidence. I am happy to answer any questions.

Dated this 24th day of November 2021



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Marcus Hayden Langman

⁵ Ibid at para 67-69

⁶ Summary of evidence from Mr Fraser Colegrave at para 17.

⁷ Summary of evidence from Mr Paul Farrelly at para 38.

⁸ Ibid at para 40-41.