

Appendix 20: Assessment of NPS-UD 2020 Objectives and Policies

Acronyms

CIAL: Christchurch International Airport Limited

FDS: Future development Strategy

NPS-UD: National Policy Statement-Urban Development 2020

PSDP: Proposed Selwyn District Plan

RPS: Canterbury Regional Policy Statement

NPS-UD Objectives	Assessment
Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	The proposed development will enable Rolleston to sustain itself as a well-functioning urban environment by consolidating the residential area close to the town centre, and provide residential development close to public transport links and the proposed District Council reserve.
Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.	The proposal provides choices in the Rolleston housing market and in doing so supports housing affordability. The applicant, Gould Developments is nearing completion of a 102 lot subdivision & housing development at Goulds Road Rolleston (all lots sold, 15-20 houses remaining to be constructed). The director of the development company has had a long term involvement in sales and marketing of Rolleston subdivisions since the mid 1990s so has an indepth knowledge of the market. The company wish to remain active in the local market but there is no remaining zoned land available for development. Plan Change 64 proposes rezoning to enable development of another 930 sections over the next 6-8 years. However, it is critical that development opportunities are made available to other landowners to ensure a competitive land and housing market rather than a 'monopoly situation'. After the Canterbury earthquakes in 2010 and 2011 Greater Christchurch, including Rolleston benefitted from the release of significant amounts of greenfield land for development, which ensured competition between landowners and developers and competitive land and house prices. Greater Christchurch house and land prices are still far more competitive than other major centres including Wellington, Auckland and Queenstown but a competitive market will not

	continue if there is a shortage of development land.
Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply: the area is in or near a centre zone or other area with many employment opportunities the area; is well-served by existing or planned public transport; and there is high demand for housing or for business land in the area, relative to other areas within the urban environment.	<p>The RPS is due for review in 2024. Proposed Change 1 to the RPS does not achieve consistency with the NPS-UD. It does not update the housing capacity targets (replaced with bottomlines in the NPS-UD) and incorrectly treats them as maximums not minimums. It does not address Policy 8 of the NPS-UD and does not provide for growth in locations meeting the relevant NPS-UD criteria. However, it does provide for medium term growth within the South Rolleston FDA. The Site is within this FDA, except for that part currently under the 50 dBA noise contour. The current operative priority greenfield development areas at Rolleston shown on RPS Map A (which are the PSDP eight Rolleston development areas/Operative District Plan ODPs) do not meet short, medium or long term housing demand at Rolleston. Further greenfield land is required. This proposal is outside but adjoins the existing development areas (Development RO1/ODP Area 4) but is largely within the Proposed Change 1 FDA. It is the closer to the town centre than any of the existing development areas, except RO1/ODP Area 2 and R02/ODP Area 9 (which are at a similar distance but remain undeveloped due to land ownership, fragmentation and access issues). The Site occupies a block of rural land that will square up the town in its urban form, and will connect the existing built up area of Rolleston with the proposed District Council reserve to the east of the development area. The restriction imposed by the CIAL noise contour effectively creates three development areas. The two areas outside the contour can yield around 450 lots. That alone will assist in meeting the high demand for housing in Rolleston. There is potentially a further 220 lots affected by the contour which is likely to move off this land in the future (at the time of the RPS review).</p> <p>The land meets all the Objective 3 locational criteria for more land for housing – the Site is close to the Rolleston town centre and Izone and Iport business areas which are a major employment area; Rolleston is well serviced by public transport, including to Christchurch City and Lincoln with a park n' ride scheme in</p>

	central Rolleston; and there is an ongoing high demand for housing, with Rolleston's principal attractions including its affordable housing, employment opportunities and the continually expanding wide range of local services and facilities.
Objective 4: New Zealand's urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.	The proposal provides for a Living Z zone within which provision is made for medium density housing and potentially a retirement village with local amenity reserves to cater for the diverse and changing needs of people and the Rolleston community. The Site has a Council District Reserve on its eastern boundary providing immense potential amenity and quality of environment benefits.
Objective 5: Planning decisions relating to urban environments, and FDSs, take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).	Matter for statutory decision-makers.
Objective 6: Local authority decisions on urban development that affect urban environments are: integrated with infrastructure planning and funding decisions; and strategic over the medium term and long term; and responsive, particularly in relation to proposals that would supply significant development capacity.	The proponents have met with Council asset staff who have confirmed that the proposal can be properly serviced and is within the capacity of existing and planned public infrastructure. See Policy 8 below re comments on proposals that would supply significant development capacity.
Objective 7: Local authorities have robust and frequently updated information about their urban environments and use it to inform planning decisions.	Matter for statutory decision-makers.
Objective 8: New Zealand's urban environments: support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change.	The proposal adjoins the existing built up area of Rolleston, close to public transport links and adjoins the proposed Council Reserve. Its excellent accessibility and the self-sufficiency of Rolleston reduces the need for private vehicle trips, reducing potential for greenhouse gas emissions. The land is inland and not subject to natural hazard risks associated with sea level rise arising from climate change.
NPS-UD Policies	Assessment
Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum: (a) have or enable a variety of homes that: (i) meet the needs, in terms of type, price, and location, of different households; and (ii) enable Māori to express their cultural traditions and norms; and	The proposal is for Living Z zoning and includes some medium density blocks and a possible retirement village which will enable a variety of homes that will help meet the needs of different households. The site location provides good accessibility to workplaces, community facilities and open spaces in the in-development reserve and the adjoining Council Reserve.

<p>(b) N/A business sectors; and</p> <p>(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and</p> <p>(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and</p> <p>(e) support reductions in greenhouse gas emissions; and</p> <p>(f) are resilient to the likely current and future effects of climate change.</p>	<p>The proposal will enable another developer to remain active in the Rolleston market which will provide choice and competition to the local land and housing market.</p> <p>The location of the Site is within walking distance of the town centre (750m at its nearest point) and the ODP/development plan shows access points and linkages in to the rest of Rolleston including to public transport routes, access to the Southern Motorway from Levi Road, and to the park and ride facility. Below is an expanded assessment of the plan change against Policy 1, focusing on the 'urban environment' being the wider Rolleston township, the surrounding district and the Greater Christchurch area.</p> <p>Additional commentary is also provided in relation to Policy 1(f) below.</p>
<p>Policy 2: Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.</p>	<p>The Operative District Plan provide eight development areas/ODP areas for Rolleston, some of which are well advanced in development. Those which are not are subject to land ownership, access, existing dwelling development and land aggregation issues which limit their effective ability to supply additional development capacity.</p> <p>The Levi Road proposal provides additional capacity to ensure that there is, actually, sufficient development capacity for a town that is growing apace and will continue to do so for the 10 year planning life of the District Plan. Evidence from real estate agents shows the surge in lot uptake and interest in Rolleston in recent years.</p>
<p>Policy 3: In relation to tier 1 urban environments, regional policy statements and district plans enable:</p> <p>(a) N/A in city centre zones; and</p> <p>(b) N/A in metropolitan centre zones, and</p> <p>(c) N/A building heights of least 6 storeys within at least a walkable catchment...</p> <p>(d) in all other locations in the tier 1 urban environment, building heights and density of urban form commensurate with the greater of:</p> <p>(i) the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services; or</p>	<p>The proposal adopts Zones and zone development and activity standards set in the Operative District Plan respectively. These make provision for suburban-type housing typologies and medium density housing (small-lot and comprehensive). The maximum height limit is 8m which limits development to two storeys.</p>

(ii) relative demand for housing and business use in that location.	
Policy 4: Regional policy statements and district plans applying to tier 1 urban environments modify the relevant building height or density requirements under Policy 3 only to the extent necessary (as specified in subpart 6) to accommodate a qualifying matter in that area.	The proposal adopts Zones and zone development and activity standards set in the Operative District Plan respectively.
Policy 5: N/A Regional policy statements and district plans applying to tier 2 and 3 urban environments	N/A Rolleston is within Greater Christchurch and is defined as part of a Tier 1 urban area.
<p>Policy 6: When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters:</p> <p>(a) the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement</p> <p>(b) that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes:</p> <p>(i) may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and</p> <p>(ii) are not, of themselves, an adverse effect</p> <p>(c) the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1)</p> <p>(d) any relevant contribution that will be made to meeting the requirements of this National Policy Statement to provide or realise development capacity</p> <p>(e) the likely current and future effects of climate change.</p>	<p>The District Council in preparing the Rolleston Structure Plan (2009) engaged with the Rolleston community over possible urban futures for the town. The Rolleston Structure Plan is now over 10 years old and overdue for review.</p> <p>The northern and central portions of the Site were not preferred as a future urban option because of the dominant and uncertain long term effect of the CIAL noise contour. Whilst the greater part of the northern site is outside the noise contour, the future growth areas followed legal title boundaries. As this land is held in the same title as land under the contour, it was all excluded. The Council retained Inner Plains Rural despite the factors of location, future urban form and ease of servicing that are features of the Site.</p> <p>The proposal will significantly contribute to the housing market in Rolleston offering 660+ lots at full development and in a location much more favourable for achieving great urban design outcomes than most of the identified development areas. It will supply significant additional capacity (an additional 12%) to the existing Rolleston land and housing supply. The proposal to re-zone the Site as Living Z is not out of step with the Operative District Plan. The proposal will result in a form of development consistent with that which dominates Rolleston and the ODP/Development Plan for the Site provides control over the key structural elements of the development. That ensures there is good integration to adjoining residential land and appropriate access points are locked in to provide for ease of movement and not just by car. The amenity values are set by the Operative District Plan subdivision, development and activity standards so the Site</p>

	will comfortably relate to, and form part of, the rest of Rolleston as it develops. Additionally the Site benefits for its co-location adjoining the future Council Reserve.
Policy 7: Tier 1 and 2 local authorities set housing bottom lines for the short-medium term and the long term in their regional policy statements and district plans.	This requires a change to the RPS. The RPS contains housing targets (Table 6.1) which were inserted to meet the requirements of the NPS-UDC. They are now out of date as the NPS-UDC has been replaced by the NPS-UD. It is understood revised housing capacity assessments must be completed by July 2021.
Policy 8: Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well functioning urban environments, even if the development capacity is: (a) unanticipated by RMA planning documents; or (b) out-of-sequence with planned land release.	This Policy can be read to apply to submissions to the PSDP and plan changes. This proposal will potentially at full development add 660 + lots (an additional 12% over and above existing zoned supply) to the housing supply for Rolleston and its location in the “gap” between the existing urban area and the proposed Council Reserve to the south will assist in delivering a compact, linked up well-functioning urban environment. A further assessment of the Plan Change against Policy 8 of the NPS-UD, taking into account the Updated Housing and Business Development Capacity Assessment (adopted December 2020) is below.
Policy 9: Local authorities, in taking account of the principles of the Treaty of Waitangi (Te Tiriti o Waitangi) in relation to urban environments, must: (a) involve hapū and iwi in the preparation of RMA planning documents and any FDSs by undertaking effective consultation that is early, meaningful and, as far as practicable, in accordance with tikanga Māori; and (b) when preparing RMA planning documents and FDSs, take into account the values and aspirations of hapū and iwi for urban development; and (c) provide opportunities in appropriate circumstances for Māori involvement in decision-making on resource consents, designations, heritage orders, and water conservation orders, including in relation to sites of significance to Māori and issues of cultural significance; and (d) operate in a way that is consistent with iwi participation legislation.	Matter for statutory decision-makers.
Policy 10: Tier 1, 2, and 3 local authorities:	There is a present planning hiatus in Greater Christchurch awaiting full review of the RPS in

<p>(a) that share jurisdiction over urban environments work together when implementing this National Policy Statement; and</p> <p>(b) engage with providers of development infrastructure and additional infrastructure to achieve integrated land use and infrastructure planning; and</p> <p>(c) engage with the development sector to identify significant opportunities for urban development.</p>	<p>2024 and the Minister's decision on Change 1 to the RPS.</p> <p>This plan change application enables the Greater Christchurch Councils to engage in the proposal ahead of the decision on Change 1.</p>
<p>Policy 11: In relation to car parking:</p> <p>(a) the district plans of tier 1, 2, and 3 territorial authorities do not set minimum car parking rate requirements, other than for accessible car parks; and</p> <p>(b) tier 1, 2, and 3 local authorities are strongly encouraged to manage effects associated with the supply and demand of car parking through comprehensive parking management plans.</p>	<p>The proposal adopts Zones and zone development and activity standards set in the Operative District Plan.</p>

Assessment of the Plan Change against Policy 1 of the NPS-UD 2020 at a township, District and Regional level

The NPS-UD 2020 does not make it explicit the scale at which individual proposals such as Plan Change 71 are to be tested against, in particular whether it should be at a local, sub-regional or regional scale. The Selwyn District Council is a Tier 1 local authority which itself has responsibilities for enabling housing capacity within its district within the short, medium and long term. This would suggest that focus of assessing proposals against Policy 1 of the NPS-UD should be more localised.

Township

The Plan Change proposal satisfies Policy 1 within a township frame of reference.

That is the findings of the Urban Design assessment (**Appendix 3** of the application). That assessment considers the urban form arising from the proposal and in particular whether the direction of growth provided for by this Plan Change application will create an appropriate urban form and density for the Rolleston township. The Urban Design Assessment addresses key elements of a well-functioning urban environment in terms of:

1. Movement and connectivity
2. Placemaking and green spaces
3. Lifestyle choice and density
4. Interfaces with adjoining land.

That Assessment identifies six key features of the proposal:

1. Continues the direct green link between Foster Park and the new district park/reserve through the extension of Broadlands Drive;
2. Provides for future connections to adjacent development in the future;

2. Delivers residential development at a minimum density of 12 households/hectare and provides for a variety of residential house types, lifestyles and price points;
3. Promotes social interaction and neighbourhood cohesion through the inclusion of neighbourhood reserves and strategically located local connections internal and external
4. Encourages active transport modes through the provision of shared paths that provide both internal connectivity as well as links to the wider Rolleston area with a focus on walking and cycling and building on the close walkable connection to the town centre;
5. Balances the constraints of site shape, geometry and the uncertainty of the noise contour line with the desire to provide a cohesive well connected residential environment;
6. Responds sensitively to its interfaces with both existing and future adjacent development and the District Park.

The Plan Change proposal sits square with Policy 1 at a township level.

District

At a District level the start point for assessing how the plan change proposal sits against Policy 1 lies with the strategy adopted in the Operative Plan that *“seeks to consolidate future residential growth in the existing townships of Lincoln and Rolleston, and to a lesser extent Prebbleton. This consolidation will provide housing for the increases in the population while creating a more compact urban form...”* (B4.3 Residential and Business Development Issues).

The District Plan also confirms the place of the Greater Christchurch Development Strategy in setting out a settlement pattern for the District:

Greater Christchurch Urban Development Strategy

The Greater Christchurch Urban Development Strategy is a long-term planning project aimed at managing Greater Christchurch’s population growth. The Strategy is a partnership between Environment Canterbury, Selwyn and Waimakariri District Councils, Christchurch City Council and the New Zealand Transport Agency (bringing together the former Transit New Zealand and Land Transport New Zealand entities). Through a set of agreed actions and a framework about how the Strategy will be managed, it sets out a settlement pattern for residential, commercial, business and rural residential growth to 2041.

The Strategy:

- *Reinforces the Selwyn communities desire to maintain its uniqueness and individual character;*
- *Encourages townships to become more self-sufficient, without attempting to duplicate the range of facilities that are in Christchurch City;*
- *Sets a broad framework for growth within which Council can facilitate market driven township growth through mechanisms such as structure plans (and subsequent outline development plans as part of a change to the District Plan);*
- *Sets density targets to encourage a full range of section sizes in a township to accommodate all ages and the increase of single person households;*
- *Encourages new growth to be designed in a manner that integrates and connects to the existing township; (B4.3 Residential and Business Development Issues).*

The Operative Plan seeks to ensure the growth and development of its main towns are co-ordinated, integrated for servicing purposes, exhibit good urban design and are managed through ODPs. All these measures are directed at ensuring development creates well-functioning urban areas that

meet the needs of people, are attractive to live in and that will become more self-sufficient over time.

The proposed Plan Change will contribute about 660 new lots in a favourable location on the edge of the District's major town and so is entirely consistent with the aim of growing Rolleston in an efficient and effective manner. It will:

1. Provide a variety of dwellings enabling diversity in the type, price and location of different households in a district with very rapid population growth, including a higher density (12 hh/ha), than the existing LZ facilitating greater provision of housing for smaller households, including retirees and single person households as well as families;
2. Provide good accessibility to the rest of the District being an edge site well serviced by arterial roads and close to the state Highway;
3. Support the competitive operation of the land and housing market creating choice and diversity within the District with competing location urban location options at Lincoln, Prebbleton and West Melton;
4. Support reductions in greenhouse gas emissions at a District level by building onto the increasing self-sufficient primary District urban area in a compact, integrated, accessible manner;
5. Be resilient to the likely current and future effects of climate change reflected in sea-level rise and storm surges, adaptable to heavy rainfall events/frequency, and the potential for building and landscape design to mitigate increased mean temperatures or amplification of heat extremes.

Regional

To the extent that at a township and district level the plan change proposal satisfies Policy 1 NPS-UD 2020, then that must hold true for the Greater Christchurch scale too. It is a question of degree. The development of the Plan Change 71 land reflects the spatial pattern of development contemplated within the Greater Christchurch urban area by, amongst others, the Greater Christchurch Urban Development Strategy. Within the Selwyn and Waimakariri Districts, urban growth is to be focused around key locations that have a high degree of transport connectivity to the rest of the Greater Christchurch area. At the same time, self-sufficiency of key population centres such as Rolleston and Lincoln in the Selwyn District, and Rangiora in the Waimakariri District is to be promoted to contribute to well-functioning urban environments.

This is a significant proposal at 660 lots at full development. It will contribute to a well-functioning Greater Christchurch urban area by adding substance to a fast-growing growth node that satisfies Policy 1 matters relating to housing choice and diversity, and especially in relation to creating a competition in the land market with the price points the development can provide compared to similar suburban development in the City and Waimakariri (see RFI 16 response). The proposal will support a competitive regional land and development market by offering additional and mainstream residential dwelling choices at a range of densities in a location identified in the regional development strategy.

Ongoing and timely infrastructure investment, and social services investment, sets up Rolleston in a favourable position to manage growth. The integration of development and servicing is no

impediment to a well-functioning urban area even at the growth rates forecast or being experienced.

Recent highway investment by the Government ensures good accessibility at a regional level between housing, jobs, education, community services, reserves for car-based trips, while good provision is made for public transport and cycling options at a regional level. Being part of the Metro bus network linked to central Christchurch removes certain barriers to movement and access to services and amenities.

Plan Change 71 enables:

1. Upgrades to Levi Road and key intersections improving access for residents to the west of the Site to community facilities including the District Park, and connectivity to the Southern Motorway;
2. Future proofing future access to further land development east of the Site;
3. Residential development at a density of 12 households/hectare and provides for a variety of residential house typologies, lifestyles and price points;
4. Connectivity to the town centre western Rolleston through direct connections with the extension of Broadlands Drive and provides for connection to adjacent future residential development to the south and east;
5. Active transport modes with shared paths and on-road cycle lanes – linking community amenity areas and reserves;
6. A sensitive response to its interfaces with both existing and future adjacent development.

The plan change application provides vital connections to adjoining existing and proposed development areas and both provides for and enables a consolidated urban form, consistent with providing a well-functioning urban environment on a scale wider than simply just the Plan Change 71 area.

Overall, the proposal will contribute to well-functioning urban environments at a localised, district and regional scale.

Further assessment of Policy 1(f)

A Flood Hazard Assessment is at **Appendix 5** of the application.

It is acknowledged that parts of the Site contained in ODP Area 4 and ODP Area 5 are identified as subject to flooding in a 1:200 and 1:500 year flood event. At para 62 of the application it is noted, amongst other things, that:

- a) *The key patterns during the one-in-200-year and one-in-500-year events are:*
- *generally the site will have some minor ponding, being less than 200mm. There is minimal ponding between 200-500mm and isolated spots with depths of 500-1000mm.*
 - *the site does not appear to be receiving flows from adjacent sites.*

The applicants note that the Council's flood maps take into account future climate change effects as explained in the introduction to the flood hazard information on the Council's website:

While the current District Plan manages a risk from a 50-year flood event, in the new Proposed District Plan we are required to identify and manage areas at risk from more extreme rainstorms and taking into account climate change effects over the next 100 years.

Additionally the Council web site sets out the current practice in managing flood risks:

- *In line with the current practice, when there is a proposal to subdivide or build a new dwelling in an area at risk of flooding, a site-specific assessment would be required. The assessment would determine the required minimum floor height level of any new building.*
- *The district-wide minimum building floor height would be 300mm above a 200-year flood level event (instead of the current requirement of 300mm above a 50-year flood level event).*
- *The site assessment would also look at whether the proposed building site meets the criteria for being in a 'high hazard area'. If it does, then additional restrictions would apply. In some circumstances, where the flooding is particularly deep or fast-flowing, this may rule out building in that location.*

The applicants are aware of these requirements and have built these considerations in to its proposals and in to its plans for the Site.

Further Assessment of the Plan Change against Policy 8 of the NPS-UD (as per Council's Request for Further Information dated 2nd February 2021)

The RFI specifically asks for, and only asks for, the additional capacity provided to the wider district over the short term timeframes (0 - 3 years/2020-2023) considered by the NPS-UD 2020.

We note that the Council adopted an update of its Housing and Business Development Capacity Assessment in December 2020. We note too that the update has yet to be reflected in statutory planning documents.

Without necessarily accepting the accuracy of predicted demand undertaken as part of the development of the Council's Housing and Business Development Capacity Assessment 2020 (HBDCA), it is noted that Appendix 1 to that Assessment sets out the changes since the earlier 2018 version.

The proposed change will create approximately 660 lots at full development and provide for the equivalent number of additional households or dwellings. The Table below responds to RFI 16 by providing data for all private dwellings in Rolleston, and for the District, and the percentage development capacity contribution made by Plan Change 71 at full development.

	2018 (count)	PC 71 %
Rolleston occupied dwellings	6,144	10.7
Rolleston population	17,499	
Selwyn District Occupied dwellings	20,754	3.2
Selwyn District Population	60,561	

Statistics NZ: data for resident population, and private dwellings (occupied, vacant, under construction)

This data shows that, assuming each lot represents one occupied dwelling, Plan Change 71 at full development will add 10.7% to the number of dwellings in Rolleston as at 2018, or 3.2% to the number of dwellings across the District.

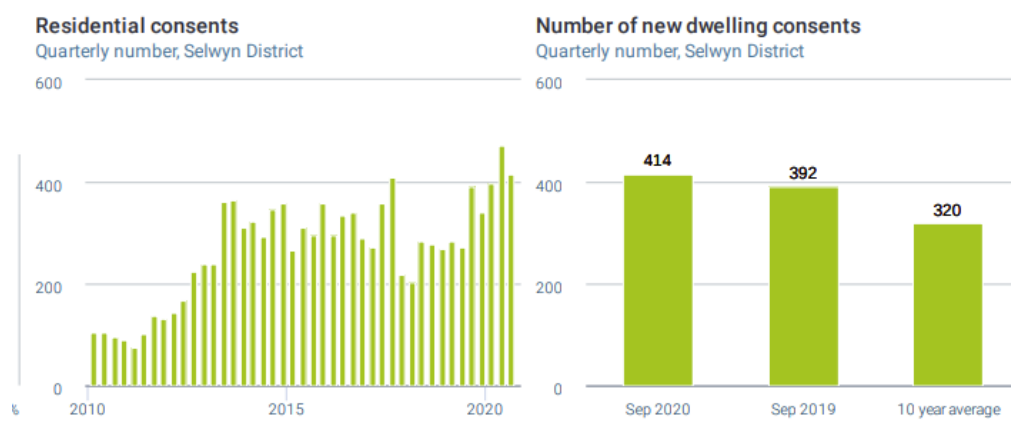
The Council December 2020 Update of its Housing and Business Development Capacity Assessment shows that there is a short term capacity of + 2543 developable lots in the short term (2020-2023) in the Greater Christchurch portion of the District. That is lots within existing development areas that are zoned and feasible for development. It is moot whether that update is still current given the analysis draws on what is now “old data” in a rapidly moving housing market where the ongoing demand for land and lots is reflected in the ongoing lift in section prices in Rolleston with the \$200,000 level now consistently being exceeded.

If this Plan Change was adopted now it would have the effect of increasing this supply of short term capacity to +3203 lots. The 660 lots in this proposal, if available on the market now, represents an additional 26% of the available capacity for that part of the District in Greater Christchurch for the period 2020-2023 as identified in the Update Report. As such the additional lots will not overwhelm the existing supply, but rather provide an important buffer to any unevenness in uptake of lots. That is as anticipated by the NPS-UD 2020 which, among other things, is framed to ensure that there is adequate supply of available developable land, rather than anticipate the market by strictly allocating or apportioning the location and timing of release of developable land.

Policy 2 NPS-UD 2020 is relevant (emphasis added)

Policy 2: Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.

The Quarterly Economic Monitor by Infometrics for Selwyn District reported to the 20 February 2021 Council meeting confirms the on-going pressures on the housing market in the District. Sales volumes in Selwyn grew by 16.1% and residential building consents were up 33.4% in the past 12 months compared to 8.1% for consents for the Canterbury Region. September 2020 was the second highest quarter on record for residential building consents in Selwyn at 414 consents. That is about 1600 consents for a calendar year albeit it is for the District as a whole.



Realistically, if this level of demand or activity were to continue over the short term i.e the next 3 years, then the identified capacity of +2,543 is hugely insufficient at best and certainly does not

allow for much competition in the market. That available capacity will be taken up at current building rates in less than two years. Realistically, if Plan Change 71 were approved sooner rather than later it could add significantly (41 % or 660/1600) to the capacity required on an annual basis for building consents for residential dwellings accepting that the building consent figures are for the District as a whole.

When assessed against the calculated shortfall of - 2737 dwellings in the 10 year medium term, the 660 lots in this proposal account for potentially 24.1% of that shortfall. In that regard it provides a significant contribution to offsetting the imminent medium term under capacity and in a location identified in the District Plan and the Urban Development Strategy as a key part of the spatial distribution of growth areas.

The Executive Summary confirms that there is a deficit in capacity of -2737 in the medium term (2020-2030), and -18,337 in the long term i.e. to 2050. This shortfall reflects a predicted future demand of 24,000 households as against an estimated feasible development capacity of 5,663 households. As a consequence, all of the plan changes lodged with the Council have the potential to contribute significantly to meeting future demand out to 2050, Plan Change 71 included. Aside from meeting the predicted future demand, each and every one of the plan change applications, if approved, will enable a greater degree of competitiveness in the residential market for both the Selwyn District and Greater Christchurch in potentially the short, medium or long term. This is entirely consistent with the direction of the NPS-UD 2020 which is to provide for a supply of housing stock which exceeds demand.

An analysis of Plan Change 71 in the context of other plan change applications, the majority of which are at a very early stage in the RMA process and most not publicly notified at the time of the RFI request, is inherently speculative and uncertain. In particular, there is no guarantee that all or any of the current plan change applications will be approved by the Council either in whole or in part thereby affecting the overall yield.

The applicant has not made such an assessment against those other Plan Change proposals.