

## Appendix 12: Assessment of National Policy Statement for Urban Development 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

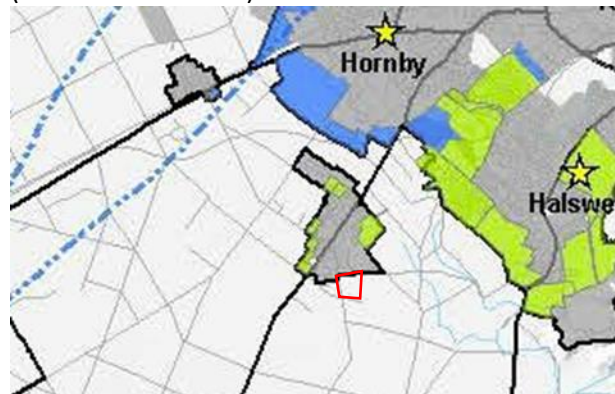
RPS: Canterbury Regional Policy Statement

NPS-UD 2020 Objectives	Assessment
<p>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.</p>	<p>The proposed development will further enable Prebbleton to sustain itself as a well-functioning urban environment by consolidating the residential area close to the town centre, and providing residential development close to public transport links and the proposed major Birchs Road Council reserve. There is a bus stop immediately to the north of the Birchs/Trices Rd intersection (adjoining the Site), with regular bus services to Christchurch City and Lincoln). The Urban Design Statement, at <b>Appendix 2</b> also addresses these aspects.</p>
<p>Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.</p>	<p>The proposal provides for choice within the Prebbleton housing market, and in doing so, supports housing affordability. Currently, the housing market at Prebbleton is 'skewed' towards larger higher priced properties, with very limited smaller medium housing development. The proposal is for a minimum housing density of 12 households per ha, and will include more affordable, medium density housing options. This is a significantly higher density than the existing development density (which is 10 households per ha or less). The landowners have no other proposals in and around Prebbleton. Currently, the land and development market in Prebbleton is dominated by one major developer. This Site is multiple ownership and will provide the opportunity for other developers to enter the local market (some of the landowners intend to develop themselves and some will sell once the land is rezoned). This has also been addressed in the Economic Assessment at <b>Appendix 8</b>.</p>

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-serviced by existing or planned public transport there is high demand for housing or for business land in the area, relative to other areas within the urban environment.

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, including at Prebbleton..

The west Prebbleton priority greenfield areas shown on Map A(green) are now fully developed (Site outlined in red).



The remainder are the two PSDP Prebbleton development areas, both at Tosswill Road. This proposal has not been identified, but it 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 Prebbleton with the proposed Birchs Road reserve to the south of the development area.

The proposed LZ zoned land can be developed into approximately 290+ lots to assist in meeting the high demand for housing in Prebbleton. As recorded in the Urban Design Statement (**Appendix 2**), the Site meets all of the Objective 3 location criteria:

- It is near and readily accessible to major employment areas at Lincoln, Rolleston and the south west Christchurch business and industrial hub;
- It is well serviced by existing public transport; and
- there is a very high demand for housing at Prebbleton.

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 LZ (26 ha) and a small area of L3 zoning (2.8 ha), within which provision is made for medium density housing with local amenity reserves to cater for the diverse and changing needs of people and the Prebbleton community. The Site has the Birchs Road Reserve

	on its southern boundary, providing important 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. The land comprises Preferred Rural Residential Area 8 in the Selwyn Rural Residential Strategy (adopted in 2014). However, given the high demand for further urban housing at Prebbleton and the more recent Council acquisition and proposal for the Birchs Rd reserve adjoining to the Site, a more efficient use of the land is for urban residential purposes (apart from the township entry component, fronting Birchs Road, proposed to be rezoned Large Lot Residential). This has been further addressed in the Urban Design Statement and Landscape Matters and Visual Assessment in <b>Appendix 2</b> . See Policy 8 below for commentary on proposals which 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 Prebbleton township, is close to public transport links, and adjoins the proposed Birchs Road Reserve. Its excellent accessibility to both Rolleston and Christchurch City, has been substantially enhanced with the new Southern Motorway extensions, and means it is now highly accessible to these nearby major employment areas, and also Lincoln. Travel distances are short, minimising vehicle miles and the potential for greenhouse gas emissions. There is a cycleway link from Prebbleton into Christchurch City, and regular bus services, including an express route. The Site is inland and not subject to natural hazard risks associated with sea level rise arising from climate change.
<b>NPS-UD 2020 Policies</b>	<b>Assessment</b>

<p>Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:</p> <ul style="list-style-type: none"> <li>(a) have or enable a variety of homes that: <ul style="list-style-type: none"> <li>(i) meet the needs, in terms of type, price, and location, of different households; and</li> <li>(ii) enable Māori to express their cultural traditions and norms; and</li> </ul> </li> <li>(b) N/A business sectors; and</li> <li>(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</li> <li>(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and</li> <li>(e) support reductions in greenhouse gas emissions; and</li> <li>(f) are resilient to the likely current and future effects of climate change.</li> </ul>	<p>The proposal is for Living Z zoning with a small area of Living 3 (2.8ha). The Site has previously been identified as suitable for rural residential (in the Selwyn Rural Residential Strategy 2014). Both options will enable a variety of homes (from a density, price bracket, and size perspective) that will help meet the needs of different households. The location of the Site, also boasts good accessibility for people to their workplaces, community facilities, and open spaces (being the in-development reserve, the utility reserves (when dry), and the adjoining Birchs Road Reserve. The proponents are the collective landowners at the Site. They are not land developers, and therefore, have no other projects in the locality: this will provide choice and competition to the local housing market.</p> <p>Specific attention has been paid to stormwater management proposals to address the specific ground conditions, changes to flood events and rainfall intensities (<b>Appendix 4</b>).</p> <p>A further assessment of Policy 1, as per Council's Request for Further Information dated 02/02/2021, has been undertaken 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 PSDP only provides two development areas for Prebbleton, one of which is well advanced in development.</p> <p>The Trices 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. The housing stock demands for Prebbleton have been assessed in the Economic Assessment at <b>Appendix 8</b>.</p>
<p>Policy 3: In relation to tier 1 urban environments, regional policy statements and district plans enable:</p> <ul style="list-style-type: none"> <li>(a) N/A in city centre zones;; and</li> <li>(b) N/A in metropolitan centre zones, and</li> <li>(c) N/A building heights of least 6 storeys within at least a walkable catchment...</li> <li>(d) in all other locations in the tier 1 urban environment, building heights and density of urban form commensurate with the greater of: <ul style="list-style-type: none"> <li>(i) the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services; or</li> </ul> </li> </ul>	<p>The proposal adopts Zones and zone development and activity standards set in the PSDP.</p> <p>Prebbleton currently provides for suburban-type housing typologies with limited medium density housing options.</p> <p>The need for specific stormwater management areas within the Site to control run-off in to off-site drainage systems ensures that overall, the Site will provide housing of a lower density, but not nearly as low as is required under Large Lot Residential. With a minimum density standard of 12 households per ha (excluding stormwater management areas), the development will include more medium density housing than has been provided for in Prebbleton to date.</p>

(ii) relative demand for housing and business use in that location.	The effective control on a standard 650m <sup>2</sup> lot (8m height limit) constrains heights to two storeys.
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 PSDP.
Policy 5: N/A Regional policy statements and district plans applying to tier 2 and 3 urban environments	N/A Prebbleton 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: (a) the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement (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>In preparing the Prebbleton Structure Plan (2010) The Selwyn District Council engaged with the Prebbleton community over possible urban futures for the town. Whilst the Structure Plan claims to provide a guiding framework for development over the next 30 years i.e. to 2040, the areas it identifies for future urban growth are all now essentially fully urbanised. It is clearly out of date and in need of review. The Site was identified as a preferred rural residential area in the Selwyn Rural Residential Strategy 2014. This is now also overdue for review and out of date. Given the continued high demand for housing at Prebbleton and the subsequent Council acquisition and planned development of a substantial reserve on land adjoining to the south of the Site, the more efficient use of the Site is for urban residential purposes (apart from the small Birchs Road frontage area, proposed to be zoned Living 3.</p> <p>The ODP/Development Plan (DEV-PR3) for the Site provides control over the key structural elements of the development. This 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.</p> <p>The amenity values are set by the PSDP subdivision, development, and activity standards therefore, the Site will comfortably relate to, and form part of, the rest of Prebbleton as it develops. The Site values assessment also benefit for its co-location, adjoining Birchs Road Reserve.</p> <p>The servicing proposals factor in effects of climate change in its designs for stormwater management.</p>
Policy 7: Tier 1 and 2 local authorities set housing bottom lines for the short-medium	This requires a change to the RPS. The RPS contains housing targets (Table 6.1) which were

<p>term and the long term in their regional policy statements and district plans.</p>	<p>inserted to meet the requirements of the NPS-UDC. They are now out of date as the NPS-UD 2020 has replaced the NPS-UDC. It is understood that revised housing capacity assessments and bottom lines must be completed by July 2021. The Economic Assessment (<b>Appendix 8</b>) is that there is only 1 year housing supply left at Prebbleton. This proposal will increase capacity to 3.9 years, enabling the short term capacity requirements to be met, but not the medium or long term requirements.</p>
<p>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:</p> <ul style="list-style-type: none"> <li>(a) unanticipated by RMA planning documents; or</li> <li>(b) out-of-sequence with planned land release.</li> </ul>	<p>This Policy can be read to apply to submissions to the PSDP and plan changes to the Operative District Plan.</p> <p>This proposal will add 297+ lots to the housing supply for Prebbleton and its location in the “gap” between the existing urban area and the proposed Birchs Road Reserve to the south will assist in delivering a compact, linked up well-functioning urban environment. It will contribute approximately 20% more lots than the existing supply at Prebbleton (1497 hhs 2018 Census), which is a significant addition.</p> <p>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.</p>
<p>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:</p> <ul style="list-style-type: none"> <li>(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</li> <li>(b) when preparing RMA planning documents and FDSs, take into account the values and aspirations of hapū and iwi for urban development; and</li> <li>(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</li> </ul>	<p>Matter for statutory decision-makers.</p>

(d) operate in a way that is consistent with iwi participation legislation.	
<p>Policy 10: Tier 1, 2, and 3 local authorities:</p> <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>There is a present planning hiatus in greater Christchurch awaiting full review of the RPS in 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 and the RPS Review.</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>

**Further Assessment of the Plan Change against Policy 1 of the NPS-UD (as per Council's Request for Further Information dated 2<sup>nd</sup> February 2021).**

The NPS-UD 2020 does not make it explicit the scale at which individual proposals such as PC72 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 the short, medium and long term within its statutory planning documents which are at district level only. This would suggest that focus of assessing proposals against Policy 1 of the NPS-UD 2020 should be focused on the Selwyn District that qualifies as an urban area.

Much of the analysis in para 40 of the application assessing the NPS-UD 2020 holds as true for the wider Greater Christchurch Urban area as it does for Prebbleton but at the appropriate scales and degrees.

The Site has been identified in the Selwyn Rural Residential Strategy (2014) as being fit for such development as Area 8. That, it would seem, confirms a Council view that rural residential/large lot developments are an important component of well-functioning urban areas such as Prebbleton. They do this by providing an area of transition between rural and residential, provide housing choice, provide different amenity and quality of environment settings and generally contribute to people's health and well-being.

MfE recommended key features of well-functioning urban environments are assessed here:

MfE Feature	District scale	Greater Christchurch scale
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Variety of homes	<p>The target market is family-based housing with some smaller units to help create a cross-section of community. The proposal sits square with the type of offerings in the District being a mix of Living Z, Living 3 and some medium density sited to best advantage.</p> <p>The proposal continues a successful and popular mix of housing typologies.</p> <p>No high rise, high density housing is proposed as that is more appropriate at the main activity centre Rolleston if at all in the District.</p>	<p>The proposal sits square with the type of offerings in Greater Christchurch being a mix of 500-650m<sup>2</sup> lots, some large lots and some medium density.</p> <p>The proposal continues a successful and popular mix of housing typologies.</p> <p>No high rise, high density housing is proposed as that is more appropriate at main activity centres or in support of City Centre rejuvenation.</p>
Variety of sites for businesses	N/A residential only proposal	N/A residential only proposal
Good accessibility by public or active transport	<p>The Site is well-connected to the rest of the District being on arterial roads.</p> <p>Bus services from elsewhere in the district pass through Prebbleton.</p> <p>Cycling facilities provide travel options in to other location and facilities in the district but distances are such that the focus of such activity is more for recreation/social activities.</p>	<p>The Site is well-connected to Greater Christchurch being on arterial roads and easily accessible to key transport corridors newly built in SW Christchurch.</p> <p>Bus services from elsewhere in the district pass through Prebbleton with direct connections to the centre of Christchurch at the bus exchange providing easy interconnectivity to other locations.</p> <p>The Site is on the Rail Trail cycle and walking route which links Lincoln, Prebbleton, Hornby and the Christchurch CBD</p> <p>The Site is easily accessible to Christchurch Airport and the rail head at Addington.</p>
Competitive land and development markets	The key growth areas are at Rolleston, Lincoln, West Melton and Prebbleton.	Map A CRPS identifies FDAs which has the effect of focusing development and restricting the development market. Additional developers, in locations



	An additional developer(s) increases competition both between district centres and has proposed development features that distinguish it from other current and known offerings in the land market.	outside FDAs (all things being equal) assist in generating competition in land supply and development options.  The Site is an attractive development option with existing on-site features being protected in a reserve, and with abundant open space created by the stormwater management system, adjacent to a district reserve; these are all features which provide distinction and marketability across Greater Christchurch.
Reductions in greenhouse gases	See para 40 of the Application  Prebbleton is at a scale and with wide range of amenities that, employment apart, mean the town is well self-contained minimising the need for travel.  The scale of the development (290 lots) means any increase to greenhouse gas emissions across the District is less than minor.	See para 40 of the Application  Prebbleton is at a scale and with wide range of amenities that, employment apart, mean the town is well self-contained minimising the need for travel. Travel times and distances to major employment areas are equivalent or less than between areas within Christchurch City (SW Christchurch employment areas, Rolleston, Lincoln, CBD etc).  The scale of the development (290 lots) means any increase to greenhouse gas emissions across Greater Christchurch is de minimis.
Resilience to future effects of climate change	See para 40 of the Application  The Site will not create adverse effects off-site from extreme weather events with the stormwater system proposed.	See para 40 of the Application  The Site in a Greater Christchurch context is very benign in relation to adverse effects arising from climate change, and has little exposure to such over its 28ha.

The concept of well-functioning urban areas can also be assessed in terms of the key activity triangle of home – work – play and the geographic relationship between them including the movement connections between them. That lies at the heart of vibrant and resilient communities.

With the introduction of the new recreational reserve to the south of Hamptons Road it is paramount that the Site is developed as a residential environment to ensure good connectivity between the existing built-up township and the new Reserve. Should the plan change site remain rural it will retain its rural characteristics but also become an isolated space inaccessible by the

public and will prevent the necessary connectivity that is essential for well-functioning urban environments. The ODP provides a north-south primary road with proposed cycle lane within the road corridor, which will connect the existing Prebbleton Domain in Tosswill Road with the new Birchs Road Reserve.

Prebbleton is fast growing (para 6 of the application). A benefit of that growth is that the town is becoming much more self-sufficient as it reaches a critical mass to support key community facilities and amenities. Prebbleton grew by 38% 2006-2013 and 63% 2013-2018 to reach 4515 in population. It has developed in depth, it is not a linear shaped town and it is compact. There are no large areas of undeveloped or “brownfields” land that disjoint the urban fabric. It has a workable commercial core that complements the range of education facilities and recreation facilities. This shape means that at its scale Prebbleton’s home-play-education-services links are still tightly confined so it is easy to move around and to access each. At its scale Prebbleton is a well-functioning urban environment.

The Site will contribute to and consolidate the compact and readily accessible urban form of Prebbleton. It is within easy walking distance from the town centre, fills in a gap in the urban form between existing residential areas on the north side of Trices Road and the proposed Birchs Road Reserve, and be consistent with the zoning to the west, which already extends south to Hamptons Road.

As it grows Prebbleton provides more local work opportunities. Its proximity and ready accessibility to nearby major employment areas in Lincoln, Rolleston, SW Christchurch, the CBD and airport mean that the home-work link is well provided for.

#### **Further Assessment of the Plan Change against Policy 8 of the NPS-UD (as per Council’s Request for Further Information dated 2<sup>nd</sup> February 2021)**

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

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) considered by the NPS-UD 2020.

The proposed change will create approximately 290 lots and provide for the equivalent number of additional households. The additional information requested for Prebbleton and District is set out below for occupied dwellings.

	<b>Occupied Private Dwellings 2018 (count)</b>	<b>%</b>
Prebbleton	1575	18.4
Selwyn District	20,754	1.3

Source: Statistics NZ: 2018 Census

The Council December 2020 Update of its Housing and Business Development Capacity Assessment shows that there is a short term available capacity of +2543 developable lots in the Greater Christchurch Urban Area within the District in the short term (2020-2023). That is lots within existing development areas that are zoned and feasible for development. If this Plan Change is adopted it would have the effect of increasing this supply of lots to +2833 lots. The 290 lots in this proposal represents an additional 10.2% of available capacity for the Greater Christchurch Urban Area within the District as a whole in the short term. As such the additional lots will not overwhelm the existing supply, but rather provide a proportionate buffer to any unevenness in uptake of lots.

Similarly when assessed against the medium term case of a calculated shortfall of -2737 dwellings in the medium term, the 290 lots in this proposal can provide potentially 10.6% towards meeting that shortfall. In that regard it provides a significant contribution to the imminent medium term under capacity and in a location that is and has undergone significant recent growth. As set out in the application, Prebbleton is well-positioned to contribute to well-functioning urban environments and to provide a base population in support of community facilities and employment opportunities in SW Christchurch.

The applicant has not considered this proposal against all the private plan changes recently lodged with the Council. An analysis which requires an assessment of Plan Change 72 in the context of other plan change applications, the majority of which are at a very early stage in the RMA process, 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.

NPS-UD Policy 1 enables a variety of homes that meet the needs, in terms of type, price and location of different households. Within this context, the proposal (at +10%) is considered to add significantly to development capacity both at Prebbleton but also the wider District over the short-term timeframes considered by the NPS-UD.