

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

UNDER

the Resource
Management Act 1991

IN THE MATTER

of Private Plan Change
73 (West Rolleston)

**STATEMENT OF EVIDENCE OF KEITH ROGER TALLENTIRE ON BEHALF OF THE
CANTERBURY REGIONAL COUNCIL AND CHRISTCHURCH CITY COUNCIL**

20 September 2021

 **Simpson Grierson**
Barristers & Solicitors

J G A Winchester / M G Wakefield
Telephone: +64 3 365 9914
Facsimile: +64-3-379 5023
Email: mike.wakefield@simpsongrierson.com
PO Box 874
CHRISTCHURCH

CONTENTS

	PAGE
SUMMARY	1
INTRODUCTION	4
STATUTORY AND PLANNING FRAMEWORK	7
SUBSTANTIVE MATTERS OF CONCERN REGARDING PC73	26

SUMMARY

1. Canterbury Regional Council (**CRC**) and Christchurch City Council (**CCC**) have sought that Private Plan Change 73 (**PC73**) be declined in its entirety.
2. They consider the plan change request is inconsistent with the agreed strategic planning framework established through *Our Space 2018-2048: Greater Christchurch Settlement Pattern Update* and the Canterbury Regional Policy Statement.
3. I have reviewed the plan change request and supporting material, together with the relevant statutory documents and legislation and, in my view, conclude that:
 - (a) PC73 would not add significant development capacity because:
 - (i) The scale of the development able to be delivered at pace is not significant in relation to the urban environment;
 - (ii) sufficient development capacity is already identified to meet expected housing demand over the medium-term and the proposed housing typologies do not go far enough to align with the housing needs stated in the 2021 Housing Capacity Assessment; and
 - (iii) it would not contribute to a well-functioning urban environment that is well-connected along transport corridors.
 - (b) By not adding significant development capacity PC73 does not engage Policy 8 of the National Policy Statement on Urban Development 2020, leaving its assessment against the relevant statutory planning framework provided by the Canterbury Regional Policy Statement and the Selwyn District Plan;
 - (c) In relation to the Canterbury Regional Policy Statement, PC73 is clearly inconsistent with Objective 6.2.1(3) which “*avoids urban development outside of existing urban areas or greenfield priority areas for development*”, and Policy 6.3.1(4) to “*ensure*

new urban activities only occur within existing urban areas or identified greenfield priority areas as shown on Map A, unless otherwise expressly provided for", as well as a number of other provisions, particularly Objective 6.2.4, and Policies 6.3.4 and 6.3.5.

(d) In relation to the Selwyn District Plan, while PC73 does not seek to amend any objectives and policies, to comply with section 75 of the Resource Management Act 1991 it must "implement" those objectives and policies. It is clear to me that this is not the case and PC73 is contrary to Objectives B4.3.3, B3.4.4 and B3.4.5, as well as Policies B2.1.13 and B4.3.1.

(e) I therefore concur with the relief sought by CRC and CCC that PC73 be declined in its entirety.

4. In reaching these conclusions I outline why I consider the Canterbury Regional Policy Statement is not inconsistent with the National Policy Statement on Urban Development 2020.

5. I also highlight the importance of strategic planning in Greater Christchurch. The local authorities in Greater Christchurch, together with other agencies and iwi, have undertaken collaborative strategic planning for nearly twenty years.

6. Importantly, a comprehensive spatial planning exercise has recently been initiated by the Greater Christchurch Partnership which will involve comprehensive engagement with all affected stakeholders. This process will strategically consider preferred locations for future growth, including identifying the broad locations in which development capacity will be provided over the long term. In my view, this spatial planning exercise should be the preferred option for identifying areas for additional urban development, over separate private plan change applications like PC73.

7. Given the large number of private plan change requests seeking additional urban development in Selwyn, any planning decisions that are not aligned with the current strategic planning framework and that are made prior to completion of this initiative run the risk of being narrowly

framed, based on incomplete information and could potentially undermine the achievement of longer-term outcomes. This should be a relevant consideration, as approving any of these requests could result in ad hoc development and set a precedent for subsequent hearings without fully considering the cumulative impacts of other requests or having previously analysed alternative growth scenarios.

INTRODUCTION

8. My full name is Keith Roger Tallentire.
9. I hold a Master's degree in Environmental Policy and Legislation and a Bachelor's degree in Geography (Hons). I have over 25 years' experience in urban development and regeneration planning, obtained equally between the UK and New Zealand.
10. I am Director of i2i Strategies Limited, a strategy and planning consultancy, and have been in this position for the last year. Prior to this I was Partnership Manager for the Greater Christchurch Partnership (**GCP**) for nine years, and previously a Senior Policy Advisor on urban development for both the Canterbury Earthquake Recovery Authority (**CERA**) and CRC.
11. I have been heavily involved with strategic planning for Greater Christchurch since 2007. I have contributed to and/or led planning processes including Proposed Change 1 to the Canterbury Regional Policy Statement 1998, the Land Use Recovery Plan, Our Space 2018-2048: Greater Christchurch Settlement Pattern Update *Whakahāngai O Te Hōrapa Nohoanga*, and most recently Proposed Change 1 to the Canterbury Regional Policy Statement 2013.
12. I am familiar with the submissions made by CRC and CCC dated 3 May 2021 in relation to this private plan change request, and the planning issues raised by those submissions. I have been authorised by both CRC and CCC to provide evidence on their behalf.

Code of Conduct

13. While this evidence is not being prepared for an Environment Court hearing, I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2014. I agree to comply with it, including when giving any oral evidence during this hearing, and have prepared my evidence on that basis. Except where I state that I am relying on the evidence of another person, I confirm that the matters addressed in my evidence are within my area of

expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

Scope of evidence

14. As noted above, my evidence is on behalf of CRC and CCC in relation to PC73 to the Selwyn District Plan (**SDP**).
15. My evidence addresses:
 - (a) CRC and CCC's interest in PC73 and how it relates to strategic planning in Greater Christchurch [18-21];
 - (b) the relevant statutory and planning framework with a focus on the Canterbury Regional Policy Statement (**CRPS**) and the National Policy Statement on Urban Development 2020 (**NPSUD**) [22-83]; and
 - (c) the substantive matters of concern, as outlined in the CRC and CCC submissions, regarding the PC73 proposal [para 84 onwards].
16. Where relevant to the matters considered in my evidence, I discuss the analysis and recommendations contained in the Section 42A Report, prepared by Liz White, Consultant Planner for Selwyn District Council (**SDC**), dated 6 September 2021 (**s42A Report**). In preparing my evidence I have reviewed the following documents:
 - (a) the notified PC73 plan change request and further information received;
 - (b) the submissions made on PC73, to the extent they are relevant to the interests of CRC and CCC;
 - (c) the s42A Report and associated expert evidence;
 - (d) the NPSUD;
 - (e) the CRPS, including Change 1 to Chapter 6 (**Change 1**);
 - (f) the SDP and the proposed SDP (**pSDP**)
 - (g) Our Space 2018-2048: Greater Christchurch Settlement Pattern Update *Whakahāngai O Te Hōrapa Nohoanga* (**Our Space**), the future development strategy for Greater Christchurch (**FDS**); and

(h) Greater Christchurch Housing Development Capacity Assessment (HCA), 30 July 2021.

17. I have recently visited the subject site itself, and nearby land subject to other plan change requests, and I am very familiar with the Rolleston township and the surrounding area.

CRC and CCC's interest in PC73 and how it relates to strategic planning in Greater Christchurch

18. CRC and CCC are local authorities with statutory functions under sections 30 and 31 of the Resource Management Act 1991 (RMA) respectively. In performing these functions, these councils (together with SDC and Waimakariri District Council) have long recognised that urban development interrelationships across the Greater Christchurch sub-region necessitate strong collaborative strategic planning. Since 2003, CRC and CCC have therefore worked together with SDC and other entities through the Greater Christchurch Partnership¹ on planning and managing urban growth and development in Greater Christchurch.²
19. This collaboration is then supported by further engagement on a raft of mechanisms that assist delivery of agreed strategic objectives, including district plans, district development strategies,³ structure plans and town centre strategies. Where necessary, to maintain alignment with these objectives and relevant individual plans of each organisation, the councils also lodge submissions on publicly notified plan changes.
20. In this case, both the submissions address strategic planning matters. Related to this, the CRC submission is focused on ensuring that the CRPS is given effect to by the SDP and any inconsistency with the regional planning framework is avoided. The CCC submission provides additional detail in relation to matters that are considered to result in

¹ The Greater Christchurch Partnership (previously the Greater Christchurch Urban Development Strategy Implementation Committee) comprises Canterbury Regional Council, Christchurch City Council, Selwyn District Council, Waimakariri District Council, Canterbury District Health Board, Te Rūnanga o Ngāi Tahu, and Waka Kotahi New Zealand Transport Agency (Waka Kotahi).

² Being the metropolitan urban area comprising towns stretching from Lincoln, Prebbleton and Rolleston in the south to Kaiapoi, Rangiora and Woodend/Pegasus in the north and the rural areas between (as described in the Introduction to Chapter 6 of the CRPS).

³ Such as Selwyn 2031.

negative cross-boundary effects for Christchurch City and potentially beyond.

21. Both submissions consider PC73 is inconsistent with the agreed strategic planning framework established through Our Space and the CRPS and seek that the request be declined (although I acknowledge that the relief sought in the CCC submission is less directive).

STATUTORY AND PLANNING FRAMEWORK

22. Section 75(3) of the RMA requires that:

A district plan must give effect to –

(a) any national policy statement; and

.....

(c) any regional policy statement.

23. In addition, when preparing or changing a district plan, section 74(2) requires the territorial authority to have regard to:

(b) any—

(i) management plans and strategies prepared under other Acts;

..... and

(c) the extent to which the district plan needs to be consistent with the plans or proposed plans of adjacent territorial authorities.

24. This part of my evidence focuses on these aspects of the statutory framework. Firstly, it briefly describes the pertinent aspects of both the NPSUD [para 25-34] and Chapter 6 of the CRPS [para 35-46] and puts this in the context of the collaborative strategic planning that has occurred in Greater Christchurch [para 47-55]. Secondly, it then provides my views on if and how the NPSUD is relevant to PC73, considers the interplay between giving effect to both the NPSUD and the CRPS, and how it has regard to the directions within the strategic planning framework.

National Policy Statement on Urban Development 2020

25. The NPSUD came into force on 20 August 2020, replacing the National Policy Statement on Urban Development Capacity 2016. It applies to all local authorities that have all or part of an urban environment within their district or region, and to planning decisions by any local authority that affect an urban environment.⁴ An urban environment means any area of land that is, or is intended to be, predominantly urban in character and is, or is intended to be, part of a housing and labour market of at least 10,000 people.⁵
26. The NPSUD identifies Christchurch as a Tier 1 urban environment. Although the NPSUD does not identify the geographic extent of the Christchurch urban area it specifies CRC, CCC, SDC and Waimakariri District Council as Tier 1 local authorities relevant to this area.⁶
27. The NPSUD contains 8 objectives and 11 policies. No objectives or policies are expressed as having priority over another. The introductory guide to the NPSUD confirms this where it states: “*Policies in the NPS-UD interact and affect the interpretation and implementation of each other*”.⁷
28. Despite this, in my view, given the prevalence of its use, the direction to achieve ‘well-functioning urban environments’ (from Objective 1 and Policy 1) is central to the NPSUD, in that it informs many of the policies and provisions in the NPSUD.⁸ Policy 1 elaborates on this direction by listing a set of outcomes that are to inform planning decisions made by local authorities. The wording used in Policy 1, and the supporting Ministry for the Environment (MfE) guidance recognises however that the list in Policy 1 is not exhaustive.⁹ I provide my assessment of PC73 in

⁴ NPSUD 1.3 Application.

⁵ NPSUD 1.4 Interpretation.

⁶ Our Space, the future development strategy adopted by each of these local authorities, has determined that the Greater Christchurch area (as identified within Chapter 6 of the CRPS) is the relevant urban environment for the purposes of the NPS requirements.

⁷ Introductory Guide to the National Policy Statement on Urban Development 2020, p10.

⁸ The associated factsheet on well-functioning urban environments states that Policy 1 “*sets direction for the intended outcomes of the NPS-UD*”, p1.

⁹ Policy 1 uses the term “*as a minimum*” and the above factsheet states, p2: “*The NPS-UD does not provide an exhaustive list of factors that contribute to well-functioning urban environments. There are other factors that contribute to the outcomes that councils and other decision-makers may wish to consider alongside those of the NPS-UD, such as principles of urban design.*”

relation to contributing to a well-functioning urban environment later in my evidence.

29. The other objectives and policies that I consider to be particularly relevant to the matters raised by PC73 are summarised below (with emphasis through underlining):

Objective 2 - that planning decisions improve housing affordability

Objective 3 - enable more residents and jobs in areas of an urban environment in or near employment centres, (and/or) well-serviced by existing or planned public transport, (and/or) where there is high demand relative to other areas;

Objective 6 - decisions on urban development are integrated with infrastructure planning and funding, strategic over the medium term and long term, and responsive to significant development capacity proposals;

Objective 8 - urban environments support reductions in greenhouse gas emissions and are resilient to the effects of climate change;

Policy 2 - 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;

Policy 6 - when making planning decisions, decision makers must have particular regard to the planned urban built form anticipated by RMA planning documents, the benefits of and changes resulting from urban development, and the relevant contribution to provide or realise development capacity;

Policy 8 - decisions 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 unanticipated or out-of-sequence with planned land release;

Policy 10 - local authorities that share jurisdiction over urban environments work together when implementing this National Policy Statement and engage with infrastructure providers to achieve integrated land use and infrastructure planning and the development sector to identify development opportunities.

30. Finally, I draw attention to two clauses within the balance of the NPSUD that provide further direction on two important matters.

31. Relative to Policy 2, ‘sufficient’ development capacity means:

- (a) Plan-enabled (i.e. in relation to the short term, zoned in an operative district plan; in relation to the medium term zoned in an operative or proposed district plan; in relation to the long term, zoned or identified for future urban use or intensification in an FDS);¹⁰
- (b) Infrastructure-ready (i.e. development infrastructure is available (short term), funded (medium term), or identified in a local authority’s infrastructure strategy (long term));¹¹
- (c) Feasible and reasonably expected to be realised;¹² and
- (d) For Tier 1 and 2 local authorities, is required to meet the expected demand plus the appropriate competitiveness margin.¹³

32. Second, the Policy 8 requirement for local authorities decisions to be responsive to plan changes that would add significantly to development capacity is elaborated on by clause 3.8. Clause 3.8 requires that local authorities must have particular regard to the development capacity provided by the plan change if that development capacity:

- (a) would contribute to a well-functioning urban environment; and
- (b) is well-connected along transport corridors; and
- (c) meets the criteria set and included in a regional policy statement, that determine what plan changes will be treated as adding significantly to development capacity.

¹⁰ NPSUD 2020 Part 3, sub-part 1, clause 3.4(1).

¹¹ NPSUD 2020 Part 3, subpart 1, clause 3.4(3).

¹² NPSUD 2020 Part 3, subpart 5, clause 3.26.

¹³ NPDUD 2020 Part 3, subpart 1, clause 3.2.

33. CRC has initiated but not yet completed work to formulate and include such criteria in the CRPS in response to clause 3.8(3). These criteria will, on my understanding, determine what constitutes significant development capacity in a Greater Christchurch and Canterbury context¹⁴.
34. The Environment Court in *Eden-Epsom Residential Protection Society Incorporated v Auckland Council*¹⁵ recently considered the application of the NPSUD in the context of a private plan change and held that it “*is not required and will not be giving effect to*” the objectives and policies in the NPSUD that do not require “planning decisions”. I have considered the NPSUD as a whole for the purpose of this evidence. I understand that it will be a matter for legal submissions as to how, and what provisions of the NPSUD should be applied to PC73.

Canterbury Regional Policy Statement

35. The policy framework in the operative CRPS that is relevant to urban development is primarily found in Chapters 5 - Land Use and Infrastructure and 6 - Recovery and Rebuilding of Greater Christchurch. Some of the issues and objectives within Chapter 5 apply across the entire Canterbury region, while others apply outside the Greater Christchurch area. For the Greater Christchurch area, the issues to be resolved, and the manner in which the objectives are to be implemented, are set out in Chapter 6. Given Rolleston is located within Greater Christchurch my evidence concentrates on Chapter 6.
36. Chapter 6 provides the resource management framework for earthquake rebuild and recovery in Greater Christchurch through to 2028. Its insertion was directed by the Minister for Canterbury Earthquake Recovery through the Land Use Recovery Plan 2013 (**LURP**). Chapter 6 also implements the strategic direction provided in the Greater Christchurch Urban Development Strategy 2007 (**UDS**).

¹⁴ Noting that Timaru and Ashburton also qualify as urban environments under the NPSUD.

¹⁵ *Eden-Epsom Residential Protection Society Incorporated v Auckland Council* [2021] NZEnvC 082.

37. Chapter 6 was promulgated to promote a more sustainable urban environment and tackle the challenges identified in Issues 6.1.1 to 6.1.5. Chapter 6 introduced a directive framework for urban growth and development within Greater Christchurch that seeks to consolidate existing urban settlements, this being considered the form of development most likely to minimise the adverse effects of travel for work, education, business and recreation, minimise the costs of new infrastructure and avoid adverse effects of development on sensitive landscapes, natural features and areas of high amenity.
38. The relevant key features of this framework (as inserted through the LURP) are:
- (a) Identification of the existing urban area and the Projected Infrastructure Boundary (**PIB**);
 - (b) Policies to avoid urban development outside of identified locations;
 - (c) Greenfield Priority Areas adjacent to the Christchurch urban area and the key towns in the Selwyn and Waimakariri Districts; and
 - (d) Map A to accompany the policy provisions and clearly depict the Greater Christchurch area.
39. Map A in Chapter 6 identifies the location and extent of urban development that will support recovery, rebuilding and planning for future growth and infrastructure delivery in Greater Christchurch. Importantly, all land identified for urban development is located within the PIB as this constitutes the agreed area that the local authorities and other infrastructure providers have planned to service with the necessary supporting urban infrastructure.
40. This provides certainty for development, encourages the sustainable and self-sufficient growth of the key towns, enables efficient long-term planning and funding for strategic, network and social infrastructure (such as schooling and healthcare), and protects significant natural and physical resources.

41. In addition, on 28 May 2021, the Minister for the Environment (**the Minister**) approved Change 1 to Chapter 6 via a streamlined planning process. Change 1 implements agreed actions in Our Space and supports the requirement in the NPSUD for local authorities to provide at least sufficient development capacity to meet expected demand for housing and business land over the short, medium, and long term.
42. When CRC provided its recommendation report to the Minister it included an evaluation of Change 1 against the relevant statutory framework, which included the NPSUD. The evaluation documented how Change 1 would give effect to the NPSUD. In approving Change 1 the Minister specifically acknowledged that CRC had complied with the RMA, regulations made under it, and any relevant national direction.
43. In summary, Change 1 amended Chapter 6 and Map A of the CRPS to identify Future Development Areas (**FDAs**) within the existing PIB in Rolleston, Rangiora and Kaiapoi, and inserted associated policy provisions which enable land within these areas to be rezoned by the Selwyn and Waimakariri District Councils if required to meet their medium term (10 year) housing needs.¹⁶ Change 1 was made operative on 28 July 2021.
44. Within the PIB, the policy framework in Chapter 6 now provides for the development of land within existing urban areas, greenfield priority areas, and FDAs (where the circumstances set out in Policy 6.3.12 are met) at a rate and in locations that meet anticipated demand and enables the efficient provision and use of network infrastructure.¹⁷ Urban development outside of these identified areas is to be avoided, unless expressly provided for in the CRPS.¹⁸
45. As outlined in more detail later in my evidence, PC73 relates to land outside the PIB that has not been identified as a greenfield priority area or FDA, nor is development of the site for urban activities expressly provided for in the CRPS.

¹⁶ Policy 6.3.12

¹⁷ Objective 6.2.2

¹⁸ Objective 6.2.1 and Policy 6.3.1.

46. Other provisions in the CRPS that I consider relevant to PC73 include:
- (a) Objective 6.2.1a - that sufficient, feasible development capacity for housing is enabled in Greater Christchurch in accordance with the targets set out in Table 6.1;
 - (b) Objective 6.2.4 - which prioritises the planning of transport infrastructure so that it maximises integration with priority areas and settlement patterns, and Policies 6.3.4 and 6.3.5 which support this objective, and others, in respect of transport effectiveness and the integration of land use and infrastructure;
 - (c) Policy 6.3.7 – which specifies minimum densities to be achieved in order to efficiently utilise identified areas and create a compact urban form with appropriate development controls that support more intensive developments; and
 - (d) Policy 6.3.11 – which prescribes the monitoring and review methods to demonstrate there is an available supply of residential and business land and provides the circumstances for initiating a review of the extent and location of land for development.

Strategic planning in Greater Christchurch

47. The local authorities, together with other agencies and iwi, have undertaken collaborative strategic planning through the GCP for nearly twenty years. Commencing with development of the UDS this collaboration was in recognition of the interconnected nature of the Greater Christchurch urban environment and the complexity of the statutory legislation that underpins how councils enable and accommodate urban growth.¹⁹
48. Collaborative strategic planning enables cross-agency tensions to be resolved, provides certainty for investment decisions (for councils, other infrastructure providers and the development sector), and provides the lens to achieve long term environmental and wellbeing outcomes. In many ways the NPSUD (including Policy 10) and the current review of resource management legislation are only now catching up with

¹⁹ Integrated decision making must traverse the RMA 1991, Local Government Act 2002, Land Transport Management Act 2003 and a range of other supporting statutes.

voluntary partnership arrangements that have been successfully operating in Greater Christchurch over this time.

49. Strategic planning exercises such as the UDS, Our Space, and more recently the Partnership's Greater Christchurch 2050 Strategic Framework, can offer more integrated and accessible mechanisms to galvanise wider community engagement than standard RMA processes. Agreed strategic directions can then be consistently anchored in statutory and non-statutory plans which provide greater detail and reflect local circumstances.
50. Importantly, a comprehensive spatial planning exercise has recently been initiated by the GCP in conjunction with delivery of the Greater Christchurch 2050 Strategic Framework and the establishment of an Urban Growth Partnership with the Crown. It is my understanding that the Greater Christchurch Spatial Plan will fulfil the FDS requirements under the NPSUD as well as integrating the future mass rapid transit and public transport business cases currently underway to determine routes and investment requirements to significantly improve the provision of public transport services across Greater Christchurch.
51. In this regard, it provides in my view the ideal opportunity to undertake comprehensive engagement and strategically consider preferred locations for future growth, including identifying the broad locations in which development capacity will be provided over the long term.
52. I understand there are a large number of private plan change requests to the SDP before SDC, many of which seek urban development outside the PIB. In my view, this is a relevant consideration for SDC, as approving any of these requests could result in ad hoc development and set a precedent for subsequent decision-making without fully considering the cumulative impacts of other requests or having previously analysed alternative growth scenarios.
53. In my view (and with reference to NPSUD Objective 6(b)), any planning decisions that are not aligned with the current strategic planning framework and that are made prior to completion of the strategic planning work underway run the risk of being narrowly framed, based on

incomplete information and could potentially undermine the achievement of longer-term outcomes set by the GCP following extensive engagement with communities. In an RMA context I would question whether such decisions would amount to sound resource management practice. I acknowledge, however, that the NPSUD requires local authorities to be responsive to unanticipated or out-of-sequence proposals, and for the reasons set out below consider that this is possible within the current CRPS framework, but not for PC73 unless a companion change to the CRPS is sought.

54. I understand that the spatial plan is expected to be completed within the next two years (but with earlier engagement on broad scenarios and options in mid-2022), to inform the 2024 Long Term Plans (**LTPs**) as required by the NPSUD. This work will inform a full review of the CRPS, which is scheduled to be notified in 2024,²⁰ and at a more local level the proposed development of an area plan for the Greater Christchurch part of the Selwyn District.²¹
55. Finally, it is noteworthy that in July 2021 the Greater Christchurch Partnership collaboratively prepared and published a Housing Capacity Assessment (**2021 HCA**),²² in accordance with the requirements of the NPSUD. The 2021 HCA provides an assessment of expected housing demand and the sufficiency of development capacity, through to 2051. Table 3 within the 2021 HCA shows that, with the inclusion of the FDAs identified through Change 1, there is sufficient development capacity (including the required competitiveness margin) within Selwyn, Waimakariri and Christchurch City, to meet expected housing demand at least over the medium term (i.e. 2021 to 2031).²³

²⁰ Environment Canterbury Long Term Plan 2021-2031, p90

²¹ Growth Planning memorandum from Mr Ben Baird, paragraph 35.

²² Greater Christchurch Housing Development Capacity Assessment, 30 July 2021.

²³ As noted in paragraph 31(a), the NPSUD only requires development capacity required in the long term to be identified within an FDS, and in relation to development infrastructure within a local authority's infrastructure strategy.

Reconciling the NPSUD, CRPS and the strategic planning framework

56. As noted in paragraphs 22 and 23, the SDP must give effect to the NPSUD and the CRPS and have regard to the strategic planning framework.²⁴
57. The NPSUD provides direction for urban environments only. The applicant agrees that, while Rolleston itself is large enough to meet the definition of an urban environment, Greater Christchurch is the applicable “urban environment” in this case.²⁵
58. For the purposes of applying the NPSUD I agree that the relevant urban environment is Greater Christchurch. This approach aligns with the position adopted in Our Space by the GCP and the information provided with the PC73 request in relation to the significant transport and employment links that Rolleston has with Christchurch City.
59. In my view, this has implications for the second test (the first being “is it part of an urban environment?”) which is whether PC73 would add ‘significantly’ to development capacity and contribute to a well-functioning urban environment, thereby engaging Policy 8 of the NPSUD.
60. Guidance released by MfE²⁶ on this matter in September 2020 advises that the scale of a development proposal and the extent to which it fulfils an identified demand are two particular factors that should influence an assessment as to its significance. Furthermore, it identifies the timing of the development and the ability to provide supporting infrastructure as integral to such an assessment.
61. In relation to scale, the evidence supporting PC73 reports an anticipated yield of 2,100 households. This would represent:
- (a) Within Rolleston, approximately 27% of the existing dwellings; 21% of projected dwellings in 2030; and 16% of that projected in 2050; and

²⁴ The UDS (and 2016 Update) prepared under the LGA 2002 and arguably its implementation arguably through the LTPs and infrastructure strategies of CRC and CCC. Our Space updated the UDS settlement pattern but as the FDS it is also a document under the RMA.

²⁵ Paragraph 165 of Attachment 6: Section 32 Evaluation.

²⁶ <https://environment.govt.nz/publications/understanding-and-implementing-responsive-planning-policies/>

- (b) Within the Selwyn District, approximately 8% of existing dwellings; 7% of projected dwellings in 2030; and 5% of that projected in 2050.

- 62.** Based on my reading of the NPSUD I do not consider either Rolleston or the Selwyn District to be the appropriate frame of reference for assessing 'significant development capacity'. I prefer an interpretation that assesses this matter in relation to the agreed urban environment of Greater Christchurch.
- 63.** As noted in the CRC submission, the medium-term housing target for Greater Christchurch as a whole is 32,300 households.²⁷ PC73 would amount to 6.5% of this total. Although there is no adopted position from CRC, CCC or the GCP on what constitutes significant development capacity, I agree with the s42A Report that the ultimate development capacity provided by PC73 is significant in the Greater Christchurch context, however I consider that a closer inspection is required.
- 64.** The MfE guidance advises that assessments regarding significance consider whether the development can be delivered at pace. As outlined in the evidence provided by the applicant, and recognising current constraints posed due to the planned infrastructure upgrades, the proposal is to preclude occupation of any dwellings on the Holmes Block and enable establishment and occupation of 148 dwellings on the Skellerup Block prior to various roading upgrades.
- 65.** The submission from Waka Kotahi states that completion of the SH1 intersection upgrade is anticipated to be by 2026. Taking these two criteria together, this effectively limits what I would consider to be the 'at pace' development of PC73 to 148 dwellings, therefore I do not consider this applicable scale of development to be significant in relation to the urban environment.
- 66.** Therefore, on this matter alone, I do not consider PC73 adds significantly to development capacity to warrant consideration under Policy 8 of the NPSUD. As a result, my view is that PC73 should be declined, as it

²⁷ CRPS Objective 6.2.1a Table 6.1 (now referred to in the NPSUD as bottom lines not targets).

cannot satisfy the relevant statutory and planning framework, specifically the CRPS.

67. Secondly, according to the MfE guidance, adding significantly to development capacity requires fulfilling an identified demand.
68. As outlined in paragraph 55, the recent 2021 HCA confirms that sufficient development capacity to meet expected housing demand over the medium term has already been identified in the CRPS.
69. Furthermore, the 2021 HCA assesses trends in household composition, affordability, tenure and the resultant housing typologies most suited to future housing needs. It reconfirms previous analysis showing the *“large growth in one person households and ‘couples without children’ households, for both ownership and rental. In terms of housing typology, Greater Christchurch’s aging population leads to significant growth in the number of one person and couple only households, resulting in a significant increase in the demand for smaller and multi-unit dwellings”*. As discussed later in my evidence, in my view PC73 does not go far enough in providing housing typologies and tenures that align with these future housing needs/demands such that it could be considered set apart from the nature of developments currently being advanced through other plan changes that are within the PIB.
70. I address these matters later in my evidence but my views on these points reinforce my opinion that PC73 cannot be viewed as adding significantly to development capacity and should be rejected.
71. Instead, I believe the merits of the proposal are best considered in conjunction with and subsequent to a broader assessment of the desirability of additional urban growth at Rolleston. This is the opportunity afforded through the recently initiated spatial planning process, and would ensure that the benefits and implications of additional urban growth at Rolleston are appropriately weighed against alternative spatial growth scenarios at a Greater Christchurch level.

72. At this point I briefly provide my opinion on three interrelated matters raised by some parties to these and other proceedings that suggest PC73 can still be enabled by the NPSUD:

- (a) Firstly, that there are presently limited growth opportunities at Rolleston, that the NPSUD requirement to enable housing needs equates to satisfying anticipated demand in each and every location within the urban area, and also that the 2021 HCA overstates available development capacity;²⁸
- (b) Secondly, that the NPSUD requires 'at least' sufficient development capacity and as such local authorities should be more enabling and provide 'plentiful' or 'ample' capacity for housing development; and
- (c) Thirdly, that the CRPS does not give effect to the NPSUD and so the CRPS is somehow less relevant to decision makers.

Housing demand, available capacity and meeting needs by location

73. I acknowledge that the NPSUD identifies that enabling a variety of homes - that meet the needs, in terms of type, price, and location, of different households - is integral to a well-functioning urban environment. I see this as a broad objective relevant to the whole urban environment and not in any way a requirement that applies to individual suburbs or townships.

74. From a locational perspective there is perhaps more direction provided by Objective 3, which seeks that 'more' people live in or near areas akin to the key activity centres of the CRPS or where there is high demand relative to other areas in the urban environment. I also note that clause 3.24(2) states that "*Local authorities may identify locations in any way they choose*".

75. I note the evidence provided by the applicant regarding the high demand for new housing in Rolleston.

76. As outlined earlier in my evidence, several important factors guide the policy framework provided by Chapter 6 and the resultant identification

²⁸ NPSUD Policy 1(a)(i)

of additional development capacity through Change 1. As one of the primary towns in Greater Christchurch, Rolleston is an important location for urban growth in this context. The newly introduced FDAs are recognition of this, and through the evaluation of Change 1 those areas were determined to be the most appropriate areas to achieve the overall outcome of a well-functioning urban environment. In my view, this must be a relevant consideration for this request.

- 77.** Nevertheless, Our Space also provides medium to long-term direction that a balanced and transitional approach is required to deliver against UDS outcomes and adapt to identified demographic and housing trends²⁹. This is reflected in Table 6.1A of Chapter 6 which adjusts the development capacity targets between the territorial authorities from 2028 to meet total projected demand for Greater Christchurch as a whole. The conclusion I draw from this direction is that the GCP and CRC consider the location of housing demand to be important but not determinative of the most appropriate location for development capacity.
- 78.** Adopting this strategic direction, consideration then follows as to whether the development capacity provided through Chapter 6 and the SDP is sufficient and not overestimated in the 2021 HCA.
- 79.** Evidence from Mr Akehurst and Mr Colegrave for the applicant highlight areas which in their view show deficiencies in the 2021 HCA and, in this case, the underpinning Selwyn Capacity for Growth Model. Although it will fall on expert witnesses from SDC to provide any detailed clarification on this matter, I am familiar with the previous methodology used to prepare the 2018 HCA, and understand that a broadly similar approach was adopted for the 2021 HCA. In that regard, and after reviewing the requirements of the NPSUD for an HCA, I make the following broad points:
- (a) I consider the 2021 HCA is generally consistent with requirements for preparing a HCA as outlined in subpart 5 of the NPSUD, including the use of population projections as the initial basis for an assessment of housing demand (adjusted as

²⁹ Our Space, Section 5.7

appropriate following consideration of other relevant information including for example building consents);

- (b) The 2018 HCA incorporated a peer review process (including from an economist and officials representing MfE and the Ministry for Housing and Urban Development) and was considered generally fit-for-purpose;
- (c) The study area for the 2021 HCA appears to differ from the 2018 HCA, the former now seemingly encompassing the full extent of the three territorial authorities as opposed to just the Greater Christchurch urban environment (as identified by Map A in the CRPS and Figure 1 in Our Space). Should areas outside Map A be included in Table 3 of the 2021 HCA this could complicate an assessment of sufficient development capacity for the purposes of these hearings;
- (d) Change 1 is now operative and the FDAs are identified on Map A. Three private plan changes (PC75, PC76 and PC78) in the Rolleston FDA are already in train, which in total could enable nearly 1,200hhs, and notably there are only a limited number of submissions in opposition. In addition, on 27 August 2021, the Environmental Protection Authority (**EPA**) granted consents under the COVID-19 Recovery (Fast-track Consenting) Act 2020 for 970 lots that will extend the Farringdon subdivision in Rolleston.³⁰ I am therefore comfortable that the FDA development capacity is included in the medium-term capacity figures in Table 3 of the 2021 HCA;
- (e) The term 'net density' is defined in Chapter 6 of the CRPS. In the context of the Rolleston FDA the only land likely to be excluded from this calculation would be areas set aside for neighbourhood commercial activities and possibly stormwater retention and treatment (although these areas sometimes double-up as local reserves which are not excluded). Local roading is not excluded. As an example of this requirement playing out in the Rolleston FDA (which is relatively unconstrained by other exemptions in the definition), PC75 identifies a developable area of 94.5%, which in my view suggests the 2021 HCA assumption is perfectly adequate, if not conservative. This misunderstanding was conceded in Mr

³⁰ <https://www.epa.govt.nz/fast-track-consenting/referred-projects/farringdon/the-decision/>

Colegrave's additional evidence as part of the PC67 hearings so I presume he will provide an updated position at these hearings;

- (f) Finally, Mr Colegrave distinguishes between capacity and likely market supply. I agree that not all development capacity is likely to be released at the same time but, in my view, the factors cited by Mr Colegrave as inhibiting the release of land would not be significant over the medium-term, being the relevant time horizon for the SDP to consider under the NPSUD. Should material reasons arise that suggest otherwise, this can be highlighted and addressed as part of the spatial planning process. I also note that the 2021 HCA includes a section on development capacity that is 'reasonably expected to be realised', which analyses past developments trends to provide a more realistic capacity assessment from that which is simply plan-enabled.³¹
- (g) In conclusion, I consider point-in-time assessments of development capacity to be important benchmark reports to guide strategic planning, but these will always be able to benefit from the more regular and comprehensive monitoring and reporting required by the NPSUD. The three-year cycle for completing HCAs (or in the first instance a NPSUD deadline for a full housing and business assessment by December 2021) ensures that any new information, methodological improvements, and views from the development sector can be considered in an orderly manner and across the entire urban environment rather than just at a local level.³²

"At least" sufficient development capacity

- 80. As I have explained in paragraph 55, and subject to any methodological clarifications that may arise through this hearing, sufficient development capacity to meet expected housing demand over the medium term has already been identified (which has led to Change 1, and the inclusion of FDAs). Should any recalculations be required these could first be offset

³¹ 2021 HCA, section 6.4

³² Policy 10(c) and clause 3.21 of the NPSUD requires that engagement occur with the development sector, including on HCAs. I note that in June/July 2021 a survey was sent to development sector stakeholders to elicit feedback to inform the 2021 HCA.

against the medium-term surplus capacity in Selwyn of between 3,667 and 4,961 households (depending on the assumed average number of households per hectare (**hh/ha**) shown in Table 3 of the 2021 HCA. Furthermore, and picking up on the point made in paragraph 77, given the extensive upzoning in Christchurch City, across the whole urban environment it also identifies a potential medium-term surplus of up to 92,453 households.

81. Whilst this is clearly providing for 'at least' sufficient development capacity, there is no requirement in the NPSUD to enable anything more than is sufficient, noting that this already includes a competitiveness margin. Providing 'abundant' development capacity could undermine the efficient and timely uptake of existing capacity, the direction to enable intensification in certain areas (based on certain criteria) and may run counter to CRC's statutory function to ensure strategic integration of infrastructure with land use.³³ In my view, this integration should include consideration of effects in respect of the wider surrounding area, including neighbouring Districts i.e. the urban environment.

CRPS giving effect to the NPSUD

82. In my opinion, the CRPS is not inconsistent with the NPSUD. I understand that through the hearings for the pSDP, some submitters have suggested that the CRPS is inconsistent with the need for flexibility that is required by the NPSUD. On this point I make the following observations:
- (a) While the NPSUD requires local authorities to be responsive to plan changes, that is only if relevant requests satisfy certain important criteria. There is nothing express or inherent in the NPSUD that demands flexibility more generally across the planning framework when enabling urban growth. Instead, the NPSUD remains focussed on integrated decision-making to achieve well-functioning environments;
 - (b) Chapter 6 of the CRPS provides clear strategic direction for urban development that in my view better contributes to a well-

³³ RMA section 30(1)(gb). This point was made in the recommendations report provided to the Minister as part of his approval of Change 1 under the streamlined planning process.

functioning urban environment for Greater Christchurch and now, with the inclusion of Change 1, gives effect to Policy 2 of the NPSUD;

- (c) Part 4 of the NPSUD sets out the important timeframes for implementing aspects of the NPSUD and so far these have been achieved (i.e. through completion of the 2021 HCA). Outside of these specific timeframes, local authorities must amend their regional policy statement or district plan to give effect to the provisions of the NPSUD as soon as practicable;
- (d) CRC has, and in my view correctly, prioritised completion of the 2021 HCA, adoption of Change 1, and development of a FDS through the Greater Christchurch Spatial Plan, over finalising the criteria under clause 3.8(3), as these steps are a more immediate, clearer and prudent way to identify additional development capacity as required by Policy 2 of the NPSUD, particularly when 'significance' should be assessed against development capacity needs for an urban environment. When CRC implements clause 3.8(3), it will need to clarify how the intent of Policy 8 is interpreted and enabled alongside the existing CRPS policy provisions that seek to avoid urban development on land outside the PIB. These criteria will naturally need to engage with demand, need and sufficiency, so that a merits case for unanticipated growth can be assessed;
- (e) Ahead of the inclusion of the criteria under 3.8(3) in the CRPS, the MfE guidance on the responsive planning policies provides quantitative and qualitative factors to determine what constitutes significant development capacity;
- (f) Ahead of the clarification signalled in (d) a pathway open to applicants seeking plan changes outside the PIB, that would give effect to both the CRPS and the NPSUD, would be to request that SDC (if it intends on approving a private plan change request) also propose to CRC an accompanying change to the CRPS to enable development in a manner that does not conflict with the Chapter 6 avoid framework. This has not occurred in relation to PC73;
- (g) I note that having identified FDAs through Change 1, the CRPS has already enabled a level of responsive planning to occur. Plan changes seeking to develop land in the FDAs which is

currently not zoned for urban activities may now be able to justify a greater level of consistency with the statutory planning framework; and

- (h) Objective 6 of the NPSUD requires that decisions are both integrated with infrastructure and strategic over the medium and long term. This recognises the importance of the strategic planning framework and confirms that Policy 8 should not operate in isolation.

83. Notwithstanding this, if it is accepted through this hearing that PC73 will add significant development capacity and can be enabled by the NPSUD (despite conflict with the CRPS), my evidence below on the substantive matters of the plan change concludes that PC73 does not meet the full requirements of Policy 8 (as expressed in paragraph 32) or the wider provisions of the NPSUD and the CRPS.

SUBSTANTIVE MATTERS OF CONCERN REGARDING PC73

84. The evidence above ultimately leads to my opinion that PC73 is inconsistent with CRPS Objective 6.2.1(3) which *“avoids urban development outside of existing urban areas or greenfield priority areas for development”*, and Policy 6.3.1(4) to *“ensure new urban activities only occur within existing urban areas or identified greenfield priority areas as shown on Map A, unless otherwise expressly provided for in the CRPS”*.
85. It follows that PC73 is therefore also inconsistent with SDP Objective B4.3.3 and Policy B4.3.1, and also pSDP Policy UG-P3 and UG-P13, as in my view, the intent of these provisions is to give effect to the above CRPS direction.
86. In my view, Objective 6.2.1 seeks to achieve an urban form that achieves consolidation and intensification of urban areas, and avoids unplanned expansion of urban areas. In this regard it complements Objective 6.2.2. I agree with the evidence provided by Mr Nicholson that the blocks comprising PC73 represent ‘peninsula’ developments that do not consolidate the Rolleston township or contribute to a compact urban form

with high connectivity.³⁴ I therefore consider PC73 is inconsistent with Objective 6.2.2 and SDP Policies B3.4.4 and B3.4.5.

87. On this point I note the evidence of Mr Compton-Moen and Ms Lauenstein. In justifying their opinions on whether PC73 contributes to a compact urban form both witnesses seem to rely on purported constraints to growth beyond the PIB leading to a conclusion that Rolleston will inevitably grow to the west and that 'the blocks are natural extensions of urban Rolleston' with consolidated urban form being achieved 'once the gaps between the newest developments are completed'.³⁵ In my view this assumption would be best tested through a more comprehensive spatial planning exercise, and that PC73 is not the appropriate frame of reference for this assessment as it presumes to identify land for future urban development that is not within the scope of PC73. The s42A Report, citing Mr Nicholson, agrees that such an exercise would be of benefit to enable consideration of rezoning land in the vicinity of PC73 but considers this as beyond the scope of this plan change process.³⁶

88. The CRC and CCC submissions also raise the following matters of merit regarding PC73, and concern that it does not give effect to other provisions in the higher order documents of the CRPS and NPSUD relating to:

- (a) Infrastructure;
- (b) Transport and public transport;
- (c) Residential density; and
- (d) Contributing to a well-functioning urban environment.

89. I address these matters in turn below.

Infrastructure

90. CRPS Policy 6.3.5(2) seeks to ensure that the nature, timing and sequencing of new development is co-ordinated with the development,

³⁴ Section 42A Report, Urban Design and Landscape, Evidence of Hugh Nicholson, para 9.1.

³⁵ Statement of Evidence, Mr Compton-Moen, paragraphs 19 and 41.3; Statement of Evidence, Ms Lauenstein, paragraph 67.

³⁶ S42A Report, paragraphs 74 and 75.

funding, implementation and operation of transport and other infrastructure. Policy 6.3.5(2)(e) states that this is in order to ensure new development does not occur until provision for appropriate infrastructure is in place.

91. My interpretation of policy limb (2)(e) is that provision for appropriate infrastructure should be real and demonstrable. In this regard, I consider that it should be identified and budgeted for in a timely manner in an Annual Plan or LTP of the local authority (unless it can be evidenced as being provided through a developer agreement or similar third party arrangement).
92. This is supported by the principal reasons and explanation of Policy 6.3.5, which states that it is important that timing and sequencing of development are aligned with funding and implementation of infrastructure. I do not agree that evidence merely demonstrating that feasible servicing options exist is sufficient, or that site specific upgrades can be made, given the integrated solutions that will be required should further notified plan changes be approved.³⁷
93. Nevertheless, I acknowledge that Mr England states that he is satisfied that feasible options are available, and there are processes in place to consider the detail of those options through the subdivision and engineering approval processes.
94. However, in relation to wastewater treatment Mr England also states that the Pines Waste Water Treatment Plant (**WWTP**) is currently at or near capacity with upgrades currently underway and additional upgrades planned and budgeted for. He states that the current connected catchment (2021) has a population equivalent of approximately 42,000 – 45,000 person equivalents (**PE**).³⁸
95. I understand the current operational consents granted by CRC for the WWTP allow for up to 47,777 PE and there has been no application to increase this.

³⁷ Section 42A Report, paragraph 55 and 56.

³⁸ Officer Comments, Murray England, paragraph 29.

96. In the s42A Report for PC67 (West Melton), Ms White agreed that *“there is a need to go beyond the application of a “first in first served” allocation of reticulated services, particular where doing so would use up capacity intended to service planned growth, or where it would prevent the development of potentially more suitable locations”*.³⁹
97. As outlined in paragraph 79(d) above, land within the Rolleston FDA has already been enabled through consents granted by the EPA or is the subject of notified plan changes⁴⁰, and significant planned development is signalled for the wider townships of Selwyn that is ultimately reliant on capacity at the WWTP. Other notified plan changes exists beyond the PIB in the Greater Christchurch area of Selwyn District.
98. In my view, approving PC73 could therefore undermine the timely delivery of land already identified for urban development within the PIB that will be reliant on the remaining infrastructure capacity at the WWTP until such time as upgrades are completed and the full range of consents are obtained.
99. Finally, I note the debate regarding the potential for residential urban development of the subject land to give rise to reverse sensitivity concerns, particularly relating to the planned expansion of the Rolleston Wastewater Treatment Plant and Rolleston Resource Recovery Park. Although this matter is more appropriately addressed by other expert evidence at these hearings, these facilities comprise important strategic infrastructure for the Selwyn District, and Policy 6.3.5(3) of the CRPS seeks to ensure the efficient and effective functioning of infrastructure, including transport corridors, is maintained, and the ability to maintain and upgrade that infrastructure is retained.

Transport and Public Transport

100. CRPS Objective 6.2.4 prioritises the planning of transport infrastructure so that it maximises integration with land use patterns and facilitates the movement of people and goods and provision of services in Greater

³⁹ Section 42A Report for PC67 (West Melton), paragraph 74.

⁴⁰ Hughes Developments: consented Covid-19 Fast-track application (80ha, 970hhs); Hughes Developments: Lodged PC70 (63ha, 800hhs); Four Stars/Gould Developments: Notified PC71 (53ha, 660hhs); Yoursection: Notified PC75 (24ha, 280hhs); Dunweavin: Notified PC76 (13ha, 155hhs); Urban Estates: Notified PC78 (63ha, 750hhs).

Christchurch, while (1) managing network congestion; (2) reducing dependency on private motor vehicles; (3) reducing emission of contaminants to air and energy use; (4) promoting the use of active and public transport modes; (5) optimising use of existing capacity within the network; and (6) enhancing transport safety.

- 101. This objective is supported by CRPS Policies 6.3.3, 6.3.4 and 6.3.5 that seek to ensure an efficient and effective transport network across Greater Christchurch, with Policy 6.3.4 (2) stating that this is achieved by: *“providing patterns of development that optimise use of existing network capacity and ensuring that, where possible, new building projects support increased uptake of active and public transport, and provide opportunities for modal choice”*.
- 102. The CCC submission cites Statistics NZ data and concludes that 40% of people leaving Rolleston North West for work or school travel into Christchurch City, primarily by private car, truck or van.
- 103. In relation to transport infrastructure, I acknowledge that the applicant proposes to limit development of PC73 prior to the completion of various roading upgrades. For the strategic transport network, this entails completion of the SH1 intersection upgrade, which Waka Kotahi anticipate will have been completed by 2026.
- 104. The transport report accompanying the s42A Report, prepared by Mr Collins, helpfully includes an assessment of the cumulative transport effects of plan changes currently lodged with SDC relating to Rolleston. I note that all but one of these plan changes have been notified, and, including PC73, hearings have either been held or are imminent for four of these requests.
- 105. Unfortunately, Mr Collins does not assess effects on the wider transport network but does conclude: *“If PPC73 (as a Plan Change outside the anticipated urban area) leads to greater residential growth in Selwyn beyond what has been anticipated [by] strategic growth plans and policies, without a corresponding increase in local employment and access to services, additional impact on the Greater Christchurch*

*transport network can be expected as additional residents in Selwyn travel to access services and employment.”.*⁴¹

- 106.** I agree with this view and consider it highly likely that approving PC73 would lead to greater residential growth in Selwyn than that anticipated, particularly over the short to medium term. I also consider that PC73 alone will not generate a sufficient increase in local employment to cater for the increased workforce population generated by the development. More generally, the larger workforce arising from the extent of recent, planned and proposed residential growth in the Greater Christchurch part of the Selwyn District outstrips the increase in local employment opportunities.
- 107.** In my view, this will exacerbate rather than reduce the level of commuting to Christchurch City, with PC73 contributing around 37% of cumulative impacts on the wider network arising from the 8 plan changes (being 2,100 hhs the additional total of 5709hhs). I disagree with the s42A Report that this is only for the councils to consider in their Long Term Plans and not a particular effect arising from the location of this particular plan change.⁴²
- 108.** Instead, I consider PC73 will generate significant downstream effects for Christchurch City where many of the ultimate destinations of Rolleston residents lie, and where levels of service in relation to traffic congestion are already poor. Modelling indicates that average speeds at the AM peak period could fall substantially by 2048, especially for trips between Selwyn, Waimakariri and Christchurch. Average travel speeds in the morning peak could reduce by over 6km/h over the next 30 years (from 42km/h in 2013 to 36km/h in 2048).⁴³
- 109.** Strategic transport assessments undertaken for Our Space and the Future PT Business Case have already been undertaken. The Housing Interactions analysis that informed Our Space concluded: *“A sensitivity test for 2048 was also modelled to test the extent to which the location of growth has an impact on the transport network. The same projected*

⁴¹ Section 42A Transport Report, Mat Collins, page 29.

⁴² Section 42A Report, paragraphs 49 and 50.

⁴³ Greater Christchurch PT Business Case: <https://www.ecan.govt.nz/your-region/living-here/transport/public-transport-services/future-public-transport>, p5.

population growth total for Greater Christchurch was used, but a higher proportion of the growth was distributed to Christchurch City, rather than Selwyn and Waimakariri Districts. The results of the sensitivity test demonstrated that the location of land use growth can significantly impact the distribution of trips and the resulting levels of congestion, with marginally better average speeds and travel times with a higher proportion of the growth distributed to Christchurch City'.⁴⁴

110. These effects on the wider transport network are not adequately addressed by the Applicant's Intergrated Transport Assessment (nor any of the transport evidence provided as part of this hearing) or mitigated by the proposal. Notably, the plan change process limits the extent to which alternative locations can be appropriately considered.
111. In relation to public transport, the CRC submission states that the subject site is not well served by public transport and cites the future mass rapid transit and public transport business cases currently underway to determine routes and investment requirements to significantly improve the provision of public transport services across Greater Christchurch.
112. In addition, in relation to population growth in Greater Christchurch the vision section of the Regional Public Transport Plan (**RPTP**) states: "*The integration of public transport and land use planning is essential to managing this growth*". In my view, the RPTP and the public transport business cases demonstrate a clear intent to seek to provide a more attractive public transport service to key towns in Greater Christchurch, such as Rolleston, but that this is not an overnight investment and approving unplanned or out-of-sequence development, particularly outside the PIB, inhibits this integrated strategic direction and the efficient and effective provision of public transport.
113. Development that precedes supporting public transport services invariably exhibits lower levels of public transport patronage, even when the internal road layout enables such services and in cases where funding is reallocated to extend bus routes at a later date. This is because new residents are most receptive to alternative travel choices before and

⁴⁴ <https://www.greaterchristchurch.org.nz/assets/Documents/greaterchristchurch/Capacity-Assessment-reports/Housing-and-Business-Development-Capacity-Assessment-Summary.pdf>, p41

during the initial occupation period following relocation. Thereafter, travel behaviours become ingrained and programmes to encourage more sustainable options are less effective.

114. In my view, development should therefore be commensurate with the level of accessibility already existing or planned, not reliant on a future of level of public transport service that is unplanned, unfunded and runs counter to the stated policy directions of statutory documents.
115. Nevertheless, I appreciate that PC73 comprises two distinct development blocks and acknowledge that the Holmes block is significantly closer to the current Route 5 bus service than the Skellerup block. New residents in the Holmes block could therefore more easily access the existing stops on this bus route than those located in the Skellerup block.
116. Overall, in my view PC73 does not support the integration of land use and transport infrastructure (CRPS Policy 6.3.5) and would impede the maintenance of an efficient and effective transport network (CRPS Policy 6.3.4). As such I consider PC73 is also inconsistent with Policy B2.1.13 of the SDP that requires “*consolidated land use patterns that will reduce the demand for transport*”.
117. I further address the greenhouse gas emission effects of PC73 below, when considering whether the request would contribute to a well-functioning urban environment.

Residential Density

118. CRC and CCC have concerns regarding the proposed density and housing typologies associated with PC73. CRPS Policy 6.3.7 requires minimum net densities to be achieved, in order to:
- (a) efficiently utilise identified land;
 - (b) help create a compact urban form that can be served efficiently by infrastructure, including public transport; and
 - (c) help ensure that housing supply and housing choice, including affordable housing options, meet demand.

- 119.** I acknowledge that the Policy 6.3.7(3) specifies minimum net densities to be achieved in various locations but does not account for the development of unplanned proposals such as PC73. I also acknowledge that the applicant proposes an average minimum net density of 12hhs/ha and this is above that set for greenfield priority areas when Chapter 6 was inserted into the CRPS.
- 120.** Nevertheless, as outlined in paragraph 69, according to the 2021 HCA, the trends in housing needs will require a significant increase in the supply of smaller and multi-unit dwellings across a broader range of tenures. In my view PC73 needs to go further in providing for and enabling such typologies and tenures in order to set it apart as being significant when viewed alongside the nature of developments currently being advanced within the PIB. As noted above, I consider that the criteria that are yet to be developed by CRPS will engage with demand and needs in this way, and that any assessment of significance in the meantime should consider these aspects.
- 121.** Furthermore, PC73 seeks to adopt the Living Z zone standards but, unlike the Outline Development Plans contained in other plan changes, does not specify the location or quantum of any medium or comprehensive development components. While this may provide flexibility for the developer at subdivision stage, there is no certainty that any housing typologies enabled through the medium density comprehensive lot sizes will eventuate.
- 122.** Evidence to demonstrate the appropriateness of higher densities is cited by the CCC submission which refers to Action 3 in Our Space to review appropriate densities for new greenfield developments. This review has now been completed and the resultant report concluded that on a case-by-case basis 15 hh/ha is both desirable and feasible as the minimum net density in new greenfield areas.⁴⁵
- 123.** A further action in Our Space (Action 2) led the GCP to commission Community Housing Aotearoa (**CHA**) to investigate future social and

⁴⁵ https://www.selwyn.govt.nz/__data/assets/pdf_file/0005/475466/UG-Chapter-Appendix-3-HG-Greenfield-Density-Analysis.pdf

affordable housing needs across Greater Christchurch, to assist in developing an action plan to increase provision. CHA highlighted the challenges of increasing such provision in housing markets primarily growing through greenfield subdivisions and noted research undertaken as part of the Building Better Homes, Towns and Cities (BBHTC) National Science Challenge that identifies the prevalence of private land covenants as inhibiting the provision of more affordable housing.

Well-functioning urban environment

124. Policy 1 of the NPSUD describes well-functioning urban environments as those that, as a minimum below (with emphasis through underlining):

- (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;
- (b) Have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and
- (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
- (d) Support and limit as much as possible adverse impacts on the competitive operation of land and development markets; and
- (e) Support reductions in greenhouse gas emissions; and
- (f) Are resilient to the likely current and future effects of climate change.

125. I note that the factsheet published by MfE on well-functioning urban environments provides guidance on the application of Policy 1,⁴⁶ including:

⁴⁶ <https://environment.govt.nz/publications/national-policy-statement-on-urban-development-2020-well-functioning-urban-environments-fact-sheet/>

- (a) that the term 'accessibility' in Policy 1 refers to the ease and cost of accessing opportunities (e.g. amenity, employment) across an urban area;
 - (b) that the outcomes referenced in the well-functioning urban environments policy are interrelated and need to be considered together – for example, housing and transport choices that relate to Policies 1(a) and 1(c) have an impact on greenhouse gas emissions, policy 1(e); and
 - (c) that the well-functioning urban environments policy is central to the NPS-UD and is to be read alongside other key policies, such as the intensification and responsive planning policies.
- 126.** Expanding on the Policy 1(c), and in relation to Policy 8, clause 3.8 requires that unanticipated or out-of-sequence plan changes must be *'well-connected along transport corridors'*.
- 127.** The MfE guidance on understanding and implementing the responsive planning policies states that ideally the transport corridors should be connected via a range of transport modes and proximate to amenities and services. The guidance states that, if possible, people should not need to rely solely on private vehicles to travel to other urban areas, or to access essential services like employment, and health or community services. It further states that ideally, developments under this policy will be transit-orientated with mixed land uses and densities.⁴⁷
- 128.** As I have outlined elsewhere in this evidence but reiterate, I do not consider PC73 achieves Policy 1(a) or (c), or that the plan change is currently well-connected along a transport corridor.
- 129.** I also consider the associated reliance on private vehicle use will inevitably prevent PC73 from supporting reductions in greenhouse gas emissions (Policy 1(e)).
- 130.** In the s42A Report, Ms White agrees that PC73 may not support reductions in greenhouse gases (primarily due to a reliance on private vehicles) but caveats this position with a view that the same situation arises currently in relation to existing zoned land or land identified for

⁴⁷ ibid, Footnote 25.

future development within Rolleston, leading to a conclusion that the proposal is not contrary to Policy 1 in this regard.⁴⁸

- 131.** I disagree with such a blanket statement and also consider that existing zoned land or land identified for future development within Rolleston should not be subject to the same test as PC73. That land has been identified as appropriate for development through a spatial planning exercise, which comprises multiple facets. While not all land within the PIB may deliver on every NPSUD or CRPS policy now, it can be reasonably expected to do so as a result of the strategic planning and infrastructure that will 'unlock' that land for development. The distinction with PC73 is that it is required to demonstrate that it will support a reduction in greenhouse gases, but it cannot.
- 132.** In this regard I have reviewed the evidence of Mr Farrelly and make the following points:
- (a) PC73 seeks to rezone land from its current Living 3 zone, so I consider that the baseline for any assessment of greenhouse gases should be the typical emissions resulting from a low density residential environment not the emissions from the activities the site is presently used for. The inclusion of methane emissions from grazing cows appears highly significant to Mr Farrelly's conclusion;
 - (b) While increasing numbers of people working from home and the use of electric vehicles could help reduce total emissions, these would not be consequent from the development itself (and derive from decisions made by private property owners). As evidence to support the likelihood of these changes is not yet available, in my view these outcomes cannot be presumed to occur. A helpful analysis that demonstrates challenges in relation to the uptake of EVs and the potential for them to significantly alter emissions from the transport sector was recently completed by a transport planner and economist from Abley Ltd⁴⁹. Summary points from the analysis including:

⁴⁸ s42A Report, paragraph 164

⁴⁹ Dr Nadine Dodge, Aug 2021: <https://talkwellington.org.nz/2021/are-evs-going-to-save-us/>

- (i) Hybrid and plug-in hybrid vehicles only marginally reduce average emissions per km, only fully electric vehicles make a real difference;
- (ii) Sales of full EVs are increasing but this still represents a drop in the ocean compared to the current composition of the NZ vehicle fleet (only half of one percent are electric vehicles and just over 2 percent are hybrids);
- (iii) Unlike the high performing comparator countries like Norway, EVs are still significantly more expensive to buy than alternatives, reducing the incentive for buyers to seek EVs;
- (iv) We generally hold on to our cars for much longer than our comparator countries and only around half of new registrations are actually NZ new vehicles, with over a third of the remaining used car imports being more than 5 years old;
- (v) Currently most used vehicles are imported from Japan and EV registrations in Japan are nowhere near enough to allow sufficient quantities of used EVs to be imported to NZ to match demand for used cars; and
- (vi) A 2030 best-case scenario would see 12% of the vehicle fleet comprising EVs, resulting in a 12 percent reduction in the average emissions factor for the vehicle fleet.

I note that the recent mode shift plan for Greater Christchurch, prepared by Waka Kotahi with the GCP,⁵⁰ states that land transport currently accounts for 41% of greenhouse gas emissions in Greater Christchurch.

Conclusions

- 133.** To conclude, I do not consider PC73 would add significant development capacity, due to the applicable scale, housing densities and typologies of the proposed development, and when considering against its contribution to a well-functioning urban environment that is well-connected along transport corridors.

⁵⁰ <https://www.nzta.govt.nz/assets/resources/keeping-cities-moving/Christchurch-regional-mode-shift-plan.pdf>

- 134.** In my view, this assessment means that PC73 does not qualify for responsive decision making under Policy 8 of the NPSUD, and that it in any event it should also be refused on the merits when assessed against the relevant statutory planning framework provided by the CRPS and SDP.
- 135.** I consider that PC73 is clearly inconsistent with Objective 6.2.1(3) and Policy 6.3.1(4) of the CRPS, as well as a number of other provisions, particularly Objective 6.2.4, and Policies 6.3.4 and 6.3.5. As a result, it should be declined in its entirety.

Dated this 20th day of September 2021

A handwritten signature in black ink, appearing to read 'K. Tallentire', with a stylized flourish extending from the end.

.....
Keith Tallentire