

SELWYN DISTRICT COUNCIL, PRIVATE PLAN CHANGE 73

Summary Statement of Keith Tallentire, planning, for CCC and CRC – 29 September 2021

1. My name is Keith Tallentire and I have prepared planning evidence on behalf of Canterbury Regional Council (**CRC**) and Christchurch City Council (**CCC**) in relation to Private Plan Change 73 (**PC73**), dated 20 September 2021. The purpose of this summary is to outline the key points made in my evidence, and respond to any evidence presented at the hearing that I consider relevant.
2. Having listened to the views of counsel and expert witnesses for the applicant during this hearing, I have not changed the position outlined in my evidence.

Strategic Planning in a Greater Christchurch context

3. In my view, PC73 is inconsistent with the strategic planning framework established through *Our Space 2018-2048: Greater Christchurch Settlement Pattern Update* and the Canterbury Regional Policy Statement (**CRPS**), including Change 1.
4. A comprehensive spatial planning exercise has recently been initiated by the Greater Christchurch Partnership (**GCP**), which will consider preferred locations for future growth across Greater Christchurch 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. Any planning decisions made that do not align with current strategic planning, and that are made prior to completion of this wider spatial planning exercise, run the risk of being narrowly framed, based on incomplete information and undermining existing strategic planning.
5. As outlined in my evidence, the 2021 Housing Capacity Assessment (**2021 HCA**) for Greater Christchurch, shows that with the new Future Development Areas (**FDAs**) sufficient development capacity is provided to meet expected housing demand at least over the medium term (i.e. 2021 to 2031).¹ I do not consider this the appropriate forum to challenge the findings of the 2021 HCA.

¹ 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.

The National Policy Statement on Urban Development Capacity (NPSUD), and its responsive planning framework

6. There are two competing interpretations of the NPSUD and its responsive planning framework. I remain of the view that the responsive planning framework is a complementary tool to strategic planning, and that it does not operate as a standalone process that enables flexibility for development.
7. While PC73 has been accepted by SDC for processing, I do not consider that it adds significant development capacity because:
 - (a) The scale of the development able to be delivered at pace is not significant in relation to the urban environment;
 - (b) 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
 - (c) it would not contribute to a well-functioning urban environment that is well-connected along transport corridors.
8. As a result, in my view PC73 should not engage with Policy 8 of the NPS-UD.

The CRPS

9. Despite the above, and even if the Commissioner considers that PC73 will add significantly to development capacity for NPSUD purposes, it is my view that PC73 should be refused on the basis of it being inconsistent with or contrary to a number of provisions in the CRPS and SDP.
10. This includes the highly directive avoid framework for urban growth provided by Objective 6.2.1, which reflects existing strategic planning and has been recently updated to enable development in additional greenfield areas.

Precedent concerns

11. In my view, the Commissioner is effectively being asked to second guess the most appropriate future strategic planning arrangements for Greater Christchurch with little assessment of the cumulative effects resulting from this and other plan changes. Given the large number of private plan change requests seeking additional urban

development in Selwyn, any decision to grant PC73 could set a precedent for future decision making, and undermine the role of the CRPS as a sub-regional growth framework.

Key Concerns

12. Many of the points of contention I have with the views of the expert witnesses for the applicant relate to presumptions with regard to future urban form, supporting infrastructure and technological or societal change. For example, setting aside my view in paragraph 4 above:

- (a) Justification for PC73 contributing to a compact urban form relies on the 'inevitability' of future planning processes to fill in the 'gaps' between the two blocks comprising PC73. This presumes future decision-making and effectively turns strategic planning on its head as the clear and legible urban boundary represented by Dunns Crossing Road would be undermined should PC73 be approved.
- (b) CRC has sought to boost public transport services during the period of its LTP 2021-2031, in accord with the Regional Public Transport Plan, and the GCP is actively investigating the potential for mass rapid transport. However, if PC73 were to be approved it will precede this investment in public transport services, ingrain travel behaviour orientated more to private vehicle use and thereby exacerbate downstream effects on the strategic transport network within Christchurch City.
- (c) Evidence for PC73 suggests that the uptake of electric vehicles will reduce the level of greenhouse emissions arising from residents commuting to Christchurch City and more generally. Also that current travel patterns will change as increased levels of homeworking become more embedded in employment practices. These changes are however at an early stage and are not without challenges in their implementation. Understandably, no authoritative evidence is provided to substantiate or quantify the veracity of these trends and any such shifts will largely be derived from advances unrelated to PC73 itself.

13. I am happy to answer any questions concerning my evidence.

Keith Tallentire

29 September 2021

