

2 June 2021

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Christchurch City Council submission on the Private Plan Change 75 Request to rezone land from Rural Inner Plains to Living Z Zone, Rolleston.

Introduction

1. Christchurch City Council (the Council) thanks Selwyn District Council for the opportunity to provide comment on the Application for Private Plan change 75 – Rolleston. The request seeks to rezone approximately 24.7 hectares of land, which would result in the ability to provide for 280 residential allotments.

Summary

2. Our Submission addresses:
 - a. The potential wider transport effects on Christchurch City; and
 - b. Residential density.
3. Christchurch City Council (thereafter referred to as “Council”) is supportive of growth in the towns in Selwyn District to support the local needs. Council has and continues to be supportive of the work that Selwyn District Council has undertaken in conjunction with the other Greater Christchurch Partners on urban form and anticipated density for development opportunities to provide for a compact and sustainable urban form. The area sought by Plan Change 75 for rezoning is within the areas identified for development in the CRPS and *Our Space 2018-2038: Greater Christchurch Settlement Pattern Update - Whakahāngai O Te Hōrapa Nohoanga (Our Space)*.
4. The Council seeks a funded and implemented public transport system to service the site prior to any residential development that provides an economically sustainable attractive alternative relative to private vehicle travel.
5. The Council seeks a minimum level of density for the development of 15 households per hectare, and that relevant recommendations of the review of minimum densities undertaken under Action 3 of *Our Space* be incorporated in the Plan Change.

Wider transport effects on Christchurch City

6. Action 9b of *Our Space* states that Selwyn and Waimakariri District Councils are required “to undertake structure planning (**including the consideration of development infrastructure and the downstream effects on the Greater Christchurch transport network**) and review of

District Plans over the next year for the identified Future Development Areas in the 2019 CRPS Change set out in Action 9a” (Our Space Page 41 – emphasis added). This action was agreed to by Selwyn District Council as a partner to the GCP. The request does not adequately assess the downstream effects on the Greater Christchurch network, as required by this action. Without a funded and established public transport network to service the site, it is likely that this development will impact on the ability of the Council to manage the downstream transport network.

7. The Statistics New Zealand 2018 Census data identifies that for Rolleston South East, 1,272 (72%) of people leave for work or school. Of these, 591 people travel into the Christchurch City Council rohe which equates to approximately 46%. The primary mode of transport is private car, truck or van.
8. The proposal relies on a future public transport network which has not been planned or funded to provide connections. The Integrated Traffic Assessment (Appendix D) identifies at paragraph 7.2 that the proposal is likely to generate 2,240 additional vehicle movements per day. Council is unclear how this addition traffic volume will support reductions in greenhouse gas emissions without a funded and implemented public transport network.
9. The application does not address the difference between accessibility through public or active transport, and car based connections to employment. The location of the site does not provide sufficient local employment to meet the needs for the potential residents, and the travel times to reach major employment hubs such as the Christchurch city centre would take approximately 25 minutes via car and approximately 85 minutes via bus. The inclusion in the request that it is possible to provide public transport does not address this disparity and promotes the reliance on car based transport. Council is unclear how this will achieve a reduction in greenhouse gas emissions, which is a requirement in the definition for a well-functioning urban environment in the NPS-UD.
10. In May 2019 the Council declared a climate emergency to enable climate to be a primary consideration for long-term planning and set the target for Christchurch to be a carbon neutral city. Transport planning and infrastructure is a significant component of moving to a carbon neutral city and it is important that new urban growth areas occur in locations which align with this wider climate change objective. This has been reinforced with the emphasis in the NPS-UD to build urban environments that are resilient to the likely current and future effects of climate change.
11. An increase in commuter traffic into Christchurch City, means more people making more trips. The result will be increased emissions, congestion and longer journey times.
12. Reducing private motor vehicle dependency is important for improving sustainability by reducing emissions and the significant adverse effects of downstream traffic within Christchurch City. The Greater Christchurch Partnership have adopted the Regional Mode Shift Plan to support this. New urban growth areas and development should be of a form which enables viable public transport services. The appropriate urban form, and provision for public transport in new urban growth areas and development, is critical in achieving those outcomes.
13. The Council seeks a funded and implemented public transport system to service the site, including connections to Christchurch City, prior to any residential development.

Density

14. The Council seeks a higher minimum density requirement of 15 households/hectare. Increased densities would better achieve efficiencies in coordination of land use and infrastructure, support mixed land use activities, support multi-modal transport systems and protect the productive rural land resource. Action 3 of *Our Space 2018-2048 (Greater Christchurch Settlement Pattern Update - Whakahāngai O Te Hōrapa Nohoanga)* was to undertake an evaluation of the appropriateness of existing minimum densities. In response to this the Greater Christchurch Partnership has commissioned a technical report on density to achieve the agreed actions in Our Space. This report will provide direction on the appropriate level of density in the Greater Christchurch area includes minimum density requirements. Council seeks that a minimum density requirement of 15 households/hectare, and the recommendations of the report, when it is finalised, are included in the plan change.

Relief Sought

15. That unless the concerns outlined above are addressed, the plan change is refused.

Thank you for the opportunity to provide this submission.

No Council cannot gain an advantage in trade competition through this submission;

Yes Council would like to be heard with regards to this submission (we may revise this position once all submissions and further submissions have been reviewed);

Yes Council would consider presenting a joint case with any submitters who raised similar points.

For any clarification on points within this submission please contact Emily Allan, Policy Planner, at emily.allan@ccc.govt.nz

Yours faithfully



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