

Notice of Submission on Proposed Plan Change 75

Resource Management Act 1991 – Form 5

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This is a submission on proposed Plan Change 75.

Environment Canterbury neither supports nor opposes the application.

- [1] Environment Canterbury has assessed the proposed Plan Change and wishes to highlight a number of matters to assist consideration of the proposal by the Council.
- [2] Environment Canterbury would not gain an advantage in trade competition through this submission.

The reasons for our submission are:

- [3] *Our Space 2018-2048: Greater Christchurch Settlement Pattern Update - Whakahāngai O Te Hōrapa Nohoanga* (Our Space 2018-2048) was endorsed by the Greater Christchurch Partnership in June 2019 and subsequently adopted by each partner council, including Environment Canterbury and Selwyn District Council. It is the future development strategy for Greater Christchurch as required by the National Policy Statement on Urban Development (NPS-UD, and at that time the NPS Urban Development Capacity).

- [4] Its particular focus is how best to accommodate housing and business land use needs in a way that integrates with transport and other infrastructure provision, building greater community resilience, and contributing to a sustainable future for Greater Christchurch that meets the needs and aspirations of our existing communities and future generations.
- [5] Our Space 2018-2048 identifies sufficient development capacity to meet anticipated housing needs over a thirty-year planning horizon out to 2048. It highlights the significant amount of housing development capacity that is already enabled through statutory regional and district planning documents and outlines an approach to address any shortfalls over time in a planned and integrated fashion.
- [6] Development that precedes ahead of, or outside of, this framework can have consequences that inhibit achievement of these strategic objectives and so requires careful and comprehensive examination.

Canterbury Regional Policy Statement (CRPS) Direction

- [7] Chapter 6 (Recovery and Rebuilding of Greater Christchurch) seeks that development is located and designed in way that achieves consolidated and coordinated urban growth that integrates with the provision of infrastructure.
- [8] The subject land is located within the projected infrastructure boundary shown on Map A within Chapter 6 but is not identified as a Greenfield Priority Area (GPA). The plan change request is therefore considered to be 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 in the CRPS”*.
- [9] However, Environment Canterbury acknowledges Our Space 2018-2048 identified the subject land as part of a Future Development Area (FDA) in Rolleston and this has been further advanced through Proposed Change 1 to the CRPS, which was approved by the Minister for the Environment on 28 May 2021 and will become operative in accordance with clause 20 of Schedule 1 of the RMA.
- [10] Environment Canterbury also accepts that planning decisions must give effect to the NPS-UD gazetted in July 2020. Policy 8 of the NPS-UD requires local authorities to be responsive to unanticipated or out-of-sequence plan change proposals and give particular regard to proposals that would add significantly to development capacity and contribute to well-functioning urban environments.
- [11] Environment Canterbury is currently working with local councils to develop criteria to be inserted into the CRPS (to meet Policy 8 Part 3, subpart 2, clause 3.8(3)) in relation to determining what plan changes will be treated as adding significantly to development capacity. To assist local authorities the Ministry for the Environment released guidance on

this matter in September 2020¹. As well as the scale of a development proposal this guidance identifies fulfilling identified demand as a factor that would influence an assessment as to its significance (including citing gaps in the supply of certain types of housing such as affordable houses, provision for higher densities and a range of housing typologies). These are housing needs identified in the most recent capacity assessment prepared for the Greater Christchurch area.

[12] Environment Canterbury questions whether the scale of the proposed development can be considered as delivering significant development capacity under Policy 8 of the NPS-UD, and believes that greater attention could be paid to better aligning with the housing needs identified in the most recent capacity assessment.

[13] This is further supported by a recent report into densities commissioned by the Greater Christchurch Partnership that concluded that on a case-by-case basis 15 households per hectare is both desirable and feasible as the minimum net density in new greenfield areas.

Public Transport

[14] Environment Canterbury also has concerns regarding how the proposal implements CRPS Policies 6.3.4 and 6.3.5 which seek to ensure an efficient and effective transport network across Greater Christchurch, with Policy 6.3.4 (2) stating:
“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”.

[15] It is acknowledged that the ODP for the site has been developed to facilitate potential public transport services through the site using the extension of Ed Hillary Drive. Nevertheless, the distance of the plan change site from existing public transport services would not provide a realistic, attractive and viable transport choice for the majority of residents. There are currently no planned upgrades or changes to the relevant Metro routes and the proposed plan change does not provide for any integrated transport options to link with existing services.

[16] Development of the site ahead of any enhanced public transport services in this location is therefore likely to be quite dependent on private motor vehicle use. This would not easily support a conclusion that the plan change site is *“well-connected along transport corridors”* as part of determining compliance with NPS-UD Policy 8.

[17] Nevertheless, should the plan change request be adopted, liaison between the developer and Environment Canterbury public transport operational staff when preparing detailed plans for potential future public transport access is advised, with adherence to the public transport guidelines developed with Selwyn District Council (attached to this submission).

¹ <https://www.mfe.govt.nz/publications/towns-and-cities/understanding-and-implementing-responsive-planning-policies>

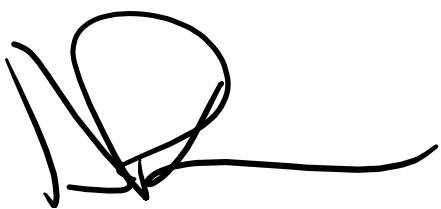
Highly Productive Land and Versatile Soils

- [18] We note the land is identified on Canterbury Maps as comprising Land Use Capability Classes 2 and 3 using the New Zealand Land Resource Inventory data set from Manaaki Whenua Landcare Research.
- [19] This means that the area would likely be identified as highly productive land under the (as yet not gazetted) National Policy Statement on Highly Productive Land (NPS-HPL). As outlined in the pNPS-HPL this new direction will aim to protect highly productive land for primary production and although an exemption is proposed for areas already identified for future urban development in district plans this site is currently zoned for rural activities.
- [20] CRPS Policy 5.3.12 seeks to maintain versatile soils that contribute to Canterbury's overall rural productive economy. While this policy relates to development within the wider region (i.e. outside of Greater Christchurch) Environment Canterbury wishes to draw attention to the emerging national direction on this matter and the strengthening of measures to protect highly productive land from development.
- [21] We also note that this is supported by the Selwyn District Plan Township Volume which contains Policy B1.1.8 that states:
"Avoid rezoning land which contains versatile soils for new residential or business development if:
- the land is appropriate for other activities; and
- there are other areas adjoining the township which are appropriate for new residential or business development which do not contain versatile soils."

The decision we would like the Council to make is:

1. To give careful consideration through the hearing process and the section 32 analysis to the justification for and the nature of residential development proposed for the site such that it could be considered to deliver significant development capacity for the District under NPS-UD Policy 8. Furthermore, that housing densities and typologies are more appropriately linked to housing needs identified in the capacity assessment collaboratively prepared by councils in the Greater Christchurch area.
2. To give careful consideration through the hearing process and the section 32 analysis as to how timely and effective public transport provision to and through the site can be achieved and any integrated transport options that would encourage uptake of existing services.

We do not wish to speak in support of our submission.

A handwritten signature in black ink, consisting of a large, stylized 'A' followed by a horizontal line extending to the right.

Andrew Parrish
Planning Section Manager

(Authorised under delegation from the Canterbury Regional Council)
Date 02/06/2021