

Before an Independent Commissioner
Appointed by the Selwyn District Council

Under the Resource Management Act 1991

In the matter of a hearing on Plan Change 79 to the Operative Selwyn District
Plan

Birchs Village Limited

Proponent

Summary Statement of Fraser Colegrave

2 May 2023

Proponent's solicitor:
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Summary of evidence

- 1 My name is Fraser Colegrave.
- 2 I prepared a statement of evidence dated 17 April 2023 in relation to economics. My qualifications and experience are set out in that statement of evidence.
- 3 I repeat the confirmation given in that statement that I have read and agree to comply with the Code of Conduct for Expert Witnesses in the Environment Court.
- 4 My role in relation to the Application is to assess its likely economic effects.

Summary

- 5 My evidence began by summarising previous work for PC79 from August 2022 before highlighting new population projections that signal even higher district population growth than before.
- 6 Then, I provided a detailed critique of the Council's new capacity for growth model – the Selwyn Capacity for Growth Model 2022 (**SCGM22**). I showed that this model is an unreliable and inappropriate basis for decision making because:
 - (a) It is an unaudited “blackbox” that has not been peer reviewed, whose outputs reveal many serious issues, and whose inputs largely remain a mystery;
 - (b) The model is based on construction costs and sales prices that are now woefully out-of-date, which invalidates its estimates of feasible capacity;
 - (c) The model miscalculates infill capacity by failing to properly account for the size, shape, value, and location of existing dwellings, sheds, driveways, swimming pools, second dwellings, and so on;
 - (d) It overstates the capacity of greenfield areas, including plan change areas whose consented or planned yields are publicly documented and well-known to stakeholders;
 - (e) It includes capacity outside the urban environment. In fact, about 20% of the model's estimated short-medium term capacity resides outside the Greater Christchurch urban environment;
 - (f) The SCGM22 fails to assess capacity sufficiency across different price bands and instead adopts a very coarse and opaque view of the need for additional capacity like PC79;
 - (g) The model does not reflect the realities of development, which has been exacerbated by an absence of any recent sector input;

- (h) It fails to account for the very long lead times associated with large greenfield developments and instead assumes that their capacities will be fully realised during the next 10 years;
 - (i) It incorrectly identifies capacity on parcels that are unavailable for development, such as Council vested reserves; and
 - (j) The model treats all sources of capacity as the same and only assesses sufficiency in aggregate terms. Consequently, it fails to properly appraise the need for additional capacity within each submarket.
- 7 Next, I assessed PC79 against the relevant provisions of the NPS HPL and showed that it meets them because:
- (a) PC79 is required to provide short-medium term capacity for Prebbleton, with an estimated shortfall of 255 to 569 dwellings over that period; and
 - (b) There are no other reasonably practicable and feasible options for providing at least sufficient development capacity within Prebbleton while achieving a well-functioning urban environment; and
 - (c) The economic benefits of PC79 outweigh the long-term economic costs associated with the loss of highly productive land for land-based primary production, taking into account both tangible and intangible values.
- 8 Finally, I recorded my disagreement with the section 42A report, which concludes – based on the SCMG22 – that PC79 is not required to provide short-medium term capacity to meet demand under the National Policy Statement on Urban Development 2020 (**NPSUD**).

Conclusion

- 9 For the reasons set out above, I continue to support PC79 on economic grounds.

Fraser James Colegrave

Dated this 2nd day of May 2023