

ATTN: Heather Goh

Brief Statement on behalf of Environment Canterbury in response to:

Minute No 6 of Commissioner David Caldwell addressing matters relating to the NPS-HPL and recent guide to implementation dated 18 January 2023

Thank you for the opportunity to provide a brief statement. Environment Canterbury agrees that the NPS-HPL guidance document clarifies implementation matters that are particularly relevant to proposed Plan Change 80.

As noted in Minute No 6 of the Commissioner, the guidance for on rezoning HPL to an urban zone at page 39 through to page 49 of the guidance is highly relevant. We would like to specifically highlight the following commentary in the guidance document:

- Table 1: Relevant NPS-HPL provisions for different proposals and activities
- Relevance of NPS-HPL for considering rezoning highly productive land (pg. 39-49)
 - Applicability of the transitional definition
 - Sufficient development capacity
 - Clause 3.6(1)(a) for only allowing urban rezoning of HPL where the rezoning is required to provide sufficient development capacity
 - Specifically short and medium term capacity (0-10 years)
 - Clause 3.6(1)(b) no other reasonably practicable and feasible options
 - Clause 3.6(1)(c) – cost-benefit assessment
 - Clause 3.6(2) – range of reasonably practicable options
 - Clause 3.6(2)(a) – greater intensification in existing urban areas

We also note that the commentary on subdivision contained in the guidance document in relation to Clause 3.8 – avoiding subdivision of highly productive land, would also be relevant to this site, including guidance on how to manage sites that contain both areas meeting the transitional definition and areas that do not (on page 18 of the document).

We believe that the guidance document (alongside the NPS-HPL) strengthens the reasons for Environment Canterbury's opposition to proposed Plan Change 80 as outlined in our original submission.