

**BEFORE THE HEARING COMMISSIONER
FOR SELWYN DISTRICT COUNCIL**

UNDER

the Resource
Management Act 1991

IN THE MATTER

of Private Plan
Changes 81 and 82
(Rolleston) by Rolleston
Industrial
Developments Limited
and Brookside Road
Residential Limited

**STATEMENT OF EVIDENCE OF MARCUS HAYDEN LANGMAN ON BEHALF OF
THE CANTERBURY REGIONAL COUNCIL AND CHRISTCHURCH CITY COUNCIL**

5 SEPTEMBER 2022

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SUMMARY

1. Canterbury Regional Council (**CRC**) and Christchurch City Council (**CCC**) (collectively the **Councils**), have sought that Private Plan Changes 81 (**PC81**) and 82 (**PC82**) to the Operative Selwyn District Plan (**SDP**), to the extent that they seek urban rezoning, be declined.
2. The two requests seek to rezone the majority of the subject land from Rural Outer Plains to Living Medium Density (**Living MD**).
3. In addition, PC82 seeks to rezone two areas within that site to Business 1 zone, along with associated amendments to Policy B4.3.77, amendments to Rules 4.9.39 and 4.9.58, and the inclusion of additional requirements for subdivision and related assessment matters. Outline Development Plans (**ODP**) are proposed for each of the sites.
4. The Council's consider that PC81 and PC82 are both inconsistent with the agreed strategic planning framework established through *Our Space 2018-2048: Greater Christchurch Settlement Pattern Update* and that they do not give effect to the Canterbury Regional Policy Statement (**CRPS**).
5. I have reviewed the plan change request and supporting material, Council's s42A officer's report, together with the relevant statutory documents and legislation. In my opinion, the relief sought by PCs 81 and 82 should be declined because:
 - (a) the additional yield provided by PC81 does not result in significant additional development capacity in terms of the NPS-UD, and while the quantum of sites may be considered significant for PC82, it does not contribute to a well-functioning urban environment;
 - (b) sufficient development capacity to meet expected housing demand has already been identified over the medium-term for the Selwyn District;
 - (c) the requests are out of sequence with planned infrastructure development in terms of the Projected Infrastructure Boundary (**PIB**), and the implications of the Medium Density Residential

Standards (**MDRS**) in terms of infrastructure development capacity have not been taken into account;

- (d) the cumulative impact of this and further unplanned greenfield expansion would likely compromise opportunities for intensification elsewhere in Greater Christchurch, as well as intensification enabled through the MDRS (which is currently being included in the PDP through the Council's IPI);
- (e) the government has sought to encourage intensification of existing urban areas through the requirement to include the MDRS in District Plans for all relevant residential zones. One of the reasons for doing so was that it would result in a more productive and efficient use of existing urban areas, and reduce pressure for urban expansion/sprawl into greenfield areas.¹ PC81 and PC82 are seeking greenfield expansion, adjacent to Rolleston;
- (f) the relief sought in PC81 and PC82 does not give effect to the following key policies in the Canterbury Regional Policy Statement (**CRPS**):

- (i) Objective 5.2.1 which seeks that development is located and designed so that it functions in a way that *“achieves consolidated, well designed and sustainable growth...provides sufficient housing choice to meet the region’s housing needs...minimises energy use and or improves energy efficiency...and avoids conflicts between incompatible activities”*;
- (ii) Objective 6.2.1(3) which seeks that *“recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that..avoids urban development outside of existing urban areas or greenfield priority areas for development unless expressly provided for in the CRPS”*;

¹ At para 9, Cabinet Paper seeking introduction of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill <https://environment.govt.nz/assets/publications/resource-management-enabling-housing-supply-and-other-matters-amendment-bill-approval-for-introduction.pdf>

- (iii) Objective 6.2.2 which seeks an urban form that *“achieves consolidation and intensification of urban areas, and avoids unplanned expansion of urban areas by...providing for development of greenfield priority areas (**GPA**), and of land within Future Development Areas (**FDA**) where the circumstances in Policy 6.3.12 are met, on the periphery of Christchurch’s urban area, and surrounding towns at a rate and in locations that meet anticipated demand and enables the efficient provision and use of network infrastructure”*;
- (iv) 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 they are otherwise expressly provided for”*, as well as a number of other provisions, particularly Objective 6.2.4, and Policies 6.3.4 and 6.3.5, and the methods identified in the CRPS which direct territorial authorities to implement the directions set out in the policy statement.
- (g) in relation to the Selwyn District Plan, the limited new provisions sought through PC81 and PC82 are not the most appropriate to achieve the objectives of the Selwyn District Plan, in particular B2.2.5, B3.4.3, B3.4.4, B3.4.5, B4.1.2, B4.3.1, B4.3.3, and their associated policies;
- (h) PC81 and PC82 are not supported by Policy 8 of the National Policy Statement on Urban Development 2020 (**NPS-UD**) in the way that the applicants outline. In my opinion, the operative CRPS and the higher order NPS-UD provisions can be read together, and there is nothing in the NPS-UD that can be interpreted to override the statutory requirement to give effect to the provisions of the CRPS ; and
- (i) taking into account the higher order planning documents, the objectives and policies of the operative district plan, and the provisions of S32 of the Resource Management Act 1991 (**RMA91**), I consider that the most appropriate zone for the land is Rural Outer Plains.

6. In reaching these conclusions I outline why I consider the CRPS is not inconsistent, or in conflict with, the NPS-UD.
7. I also explain in my evidence the background and importance of strategic planning for Greater Christchurch. The local authorities in Greater Christchurch, together with other agencies and iwi, have undertaken collaborative strategic planning for nearly twenty years. The risk with PC81 and PC82, and others, is that if they are approved they will undermine the existing strategic planning framework within the CRPS.
8. A spatial planning exercise, the Greater Christchurch Spatial Plan, has recently been initiated by the Greater Christchurch Partnership (**GCP**)² which will involve comprehensive engagement with all affected stakeholders. This process will strategically consider preferred locations for future growth, including identifying the broad locations in which development capacity will be provided over the long term. This will then inform identification of areas for greenfield expansion in the CRPS, which will be given effect to through the respective district plans. In my view, this spatial planning exercise is the preferred option for identifying areas for additional urban development, as opposed to through private plan change applications such as PC81 and PC82.
9. Given the number of private plan change requests seeking additional urban development in Selwyn District, including outside the PIB in areas that are not contemplated for urbanisation in the CRPS (both live, and now determined), any planning decisions that are not aligned with the current strategic planning framework and that are made prior to completion of this wider Spatial Plan process run the risk of being narrowly framed, based on incomplete information and could potentially undermine the achievement of longer-term outcomes, such as intensification across Greater Christchurch. I consider this a directly relevant, and important, consideration, as approving any of these requests could result in ad hoc development and set a precedent for subsequent requests without fully considering the cumulative impacts of other requests. Finally, I consider that a collective view should be taken

2 The Greater Christchurch Partnership consists of Christchurch City Council, Canterbury Regional Council, Selwyn District Council, Waimakariri District Council, Te Rūnanga o Ngāi Tahu, Waka Kotahi/New Zealand Transport Agency and Canterbury District Health Board.

to how the various private plan change requests could impact on, or undermine, urban growth scenarios across Greater Christchurch.



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Marcus Langman