

**BEFORE THE SELWYN DISTRICT COUNCIL HEARINGS
PANEL**

IN THE MATTER of the Resource Management Act
1991

AND

IN THE MATTER of a submission by Trices Road
Rezoning Group on the Proposed Selwyn District
Plan, Strategic Directions Chapter (Submission no.
298)

**STATEMENT OF EVIDENCE OF IVAN THOMSON ON BEHALF OF THE TRICES
ROAD REZONING GROUP, PREBBLETON**

23 July 2021

SUMMARY STATEMENT

1. The Trices Road Rezoning Group's ('TRRG') submission on Strategic Directions seek amendments to the Proposed Selwyn District Plan (PSDP) primarily to achieve consistency with and give effect to the National Policy Statement – Urban Development 2020 (NPS-UD).
2. TRRG is a group of eight property owners with an interest in land adjoining the southwestern part of Prebbleton Township. TRRG has lodged several submissions on various parts of the PSDP as follows:
 - a) Rezoning of rural land at the southwestern part of Prebbleton to a combination of General Residential Zone (GRZ) and Large Lot Residential Zone (LLRZ);
 - b) Inserting a new development plan (DEV-PR 3) to guide the implementation of the rezoning;
 - c) Amending the Definitions of 'Township Network' and 'Service Activity Centre';
 - d) Amending several policies in the Urban Growth (UG) chapter; and
 - e) Amending the wording of Strategic Direction Objective SD-UFD-02.
3. The TRRG submission (e) above seeks to amend SD-UFD-02 as follows (changes sought are in **bold underlined**):

*There is **as a minimum** sufficient feasible development capacity **in each township** to meet anticipated demands for housing and business activities.*
4. The purpose of the first limb – the addition of the words '**as a minimum**' – is to better align the Objective with the NPS-UD. Policy 2 of the NPS-UD requires:

*Tier 1, 2, and 3 local authorities, at all times, provide **at least sufficient development capacity** to meet expected demand for housing and for business land over the short term, medium term, and long term.*
5. The proposed wording in the PSDP does not reflect the intent of the NPS-UD which is to provide **at least** sufficient development capacity. Subpart 1 3.2 (2) of the NPS-UD stipulates what 'sufficient' means, including a requirement for a 'competitive margin' over and above expected demand. My interpretation is, therefore, Policy 2 requires local authorities to treat the competitive margin as a minimum buffer.
6. I can see nothing in NPS-UD that prevents the Council from enabling/ providing for in their plans, more than 'sufficient development capacity', whether the enablement applies to an urban environment (Greater Christchurch) or not. I acknowledge that consideration also needs to be given as to whether the amendment gives effect to Chapter 6 of the Canterbury Regional Policy Statement as well as the NPS-UD.
7. The second limb of the submission – the addition of the words '**in each township**' – seeks (at least) sufficient development capacity is provided for in each township. This wording provides

more clarity than the notified SD-UFD-02 which in my view does not give effect to the NPS-UD. For example:

Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum: have or enable a variety of homes that:

(i) meet the needs, in terms of type, price, and location [my emphasis], of different households; and...

8. It is reasonable to expect each township to have sufficient development capacity to meet expected demand of that community. Of course, the quantum of that capacity will depend on the planned or expected growth of that township, which in turn will depend on where that town sits in terms of the Township Network and Activity Centre Network described under the Definitions chapter. The amendment also supports Objective SD-UFD-01: “Urban growth is located only in or around existing townships and in a compact and sustainable form that aligns with *its anticipated role in the Township Network*, (my emphasis) while responding to...”
9. Because of this link, I have extended the scope of my evidence to include TRRG’s submissions on the Definitions chapter. TRRG seeks amendments to the definition of ‘Township Network’ and the definition of ‘Service Activity Centres’ to recognise Prebbleton’s potential growth and other special characteristics not found in other settlements in the Township Network. I see direct connection between these proposed amendments and the second limb of the submission on proposed SD-UFD-02.
10. TRRG lodged several further submissions on the SD chapter including those opposing Christchurch City Council, Horticulture NZ, Federated Farmers, and Fonterra. These cover matters concerning the integration of urban form with transport, and effects of new urban development on productive soils and reverse sensitivity. These further submissions seek to reduce the level of prescription to provide decision makers with more flexibility when considering proposals for urban expansion.

INTRODUCTION

11. My full name is Ivan Thomson and I hold the position of Senior Planner with Aston Consultants.
12. I have a Master's Degree in Urban and Regional Planning (M.Phil) from Reading University in England. I have 38 years' post graduate experience in urban and regional planning, and I am a Fellow Member of the New Zealand Planning Institute.
13. My experience includes 30 years at the Christchurch City Council, including 12 years' involvement with preparation, hearings and appeals for the former Christchurch City Plan, four years leading an Area Plans programme, with the remainder of my time there being in a leadership/management role, including the Christchurch Replacement District Plan.
14. I confirm that I have read the Code of Conduct for Expert Witnesses contained in Part 7 of the Environment Court Practice Note 2014, and that I agree to comply with it for this hearing. I also confirm that I have considered all the material facts that I am aware of that might alter or detract from the opinions that I express, and that this evidence is within my area of expertise, except where I state that I am relying on the evidence of another person.
15. The key documents I have used, or referred to, in forming my view while preparing this evidence are:
 - a) Selwyn District Development Strategy.
 - b) Proposed Selwyn District Plan Strategic Directions, Definitions and Urban Growth.
 - c) Canterbury Regional Policy Statement (CRPS).
 - d) National Policy Statement on Urban Development 2020.

PURPOSE AND SCOPE OF EVIDENCE

16. My evidence concerns the submission by the Trices Road Rezoning Group (TRRG) (sub no 0298). I have listed the individual submission points as summarised in **Appendix 1** to my evidence. The scope of my evidence, and the relief sought by the submitter, is limited to (e) in paragraph 20 below. I also refer to submissions opposed by TRRG and comment on the Officer's Report dated 9 July 2021.
17. The TRRG submission needs to be read as a whole and the changes sought to the objectives, policies and definitions are considered a prerequisite to securing the rezoning of the submitters' land for residential purposes. I have not considered the merits of the TRRG rezoning and have confined my evidence to whether the submissions on the Strategic Directions have resource management merit in terms of higher-level documents and other relevant matters.
18. My evidence should be read alongside, and in combination with, the TRRG submissions and further submissions. It does not cover all amendments sought by those submissions and further submissions and is supplementary to and provides further explanation for the reasons for some (but not all) of the changes sought.

19. This hearing is about the Strategic Directions, but it is difficult to segregate the submission points on this chapter from the others in Urban Growth and Definitions. I note that Strategic Directions Overview, under (3) says that the Chapter is intended to demonstrate 'integrated management through the grouping of environmental considerations which combine to achieve strategic outcomes; and avoiding strategic objectives becoming isolated within various chapters of the District Plan'. I support this and towards the end of my evidence I make a brief reference to the way I see the TRRG submission affecting the Definitions of Township Network and Activity Centre Network.

OVERVIEW

20. TRRG have lodged a submission on the PSDP seeking changes to a variety of provisions as follows: **(Refer to Appendix 1 for full summary of the submission).**

- a) Rezoning of rural land at the southwestern part of Prebbleton to General Residential Zone (GRZ) and, for two parcels, Large Lot Residential Zone (LLRZ);
- b) Inserting a new development plan (DEV-PR 3) to guide the implementation of the rezoning;
- c) Amending the Definitions of 'Township Network' and 'Service Activity Centre';
- d) Amending several policies in the Urban Growth (UG) chapter;
- e) Amending the wording of Strategic Direction Objective SD-UFD-02. As follows:

*There is **as a minimum** sufficient feasible development capacity **in each township** to meet anticipated demands for housing and business activities.*

- f) Any consequential, further or alternative amendments to the PDP to be consistent with and give effect to the intent of this submission and the interests of the Submitter.

21. The focus of the TRRG submissions is to support a change the District Planning Map to enable residential development on land that is currently zoned rural in the PSDP. Evidence will be presented on the rezoning at a later date. The land concerned is shown in **Figure 1**.

22. By way of background, TRRG lodged a private plan change request with the Council in November 2020 (Plan Change 72) to the Operative Selwyn District Plan. That request seeks to rezone approximately 28 hectares of rural land at the southern part of Prebbleton (south of Trices Road, located between the current urban boundary and Birchs Reserve) to Living Z, including the southwest corner block to be Living 3 (Birchs/Hamptons Road) (see **Figure 1** below). The alternative less preferred relief is Living 3 for the entire site. The preferred option would enable approximately 290 residential sites. The Plan Change was publicly notified on 30 June and submissions closed on 29 July 2021.



Figure 1. Site where zoning is proposed. Through Proposed Plan Change 72 to the Operative Plan, and Submissions on the Proposed Selwyn District Plan.

23. The Site is zoned General Rural Zone Special Control Area RD1 (SCA-RD1) with an Urban Growth Overlay (**Figure 2**). The minimum lot size for subdivision and a dwelling in SCA-RD1 is 4 ha. The Urban Growth Overlay applies to land which is either a greenfield priority area, or any subsequent urban growth areas, or urban containment boundaries, in the Canterbury Regional Policy Scheme; or identified for rural residential purposes in an adopted Rural Residential Strategy, in accordance with PSDP Policy UG-P13.¹
24. The TRRG submission is concerned with ensuring that both the objective and policy framework in the PSDP accurately reflects the statutory framework established in higher level documents and that the provisions in the PSDP are internally consistent. This will provide a more appropriate framework for assessing the merits of the TRRG rezoning. My evidence also demonstrates that the amendments sought in the TRRG submissions will be consistent with and give effect to the NPS-UD, and lead to better policy integration within the PSDP.

¹ I have attached an extract from UG P-13 in Appendix 2

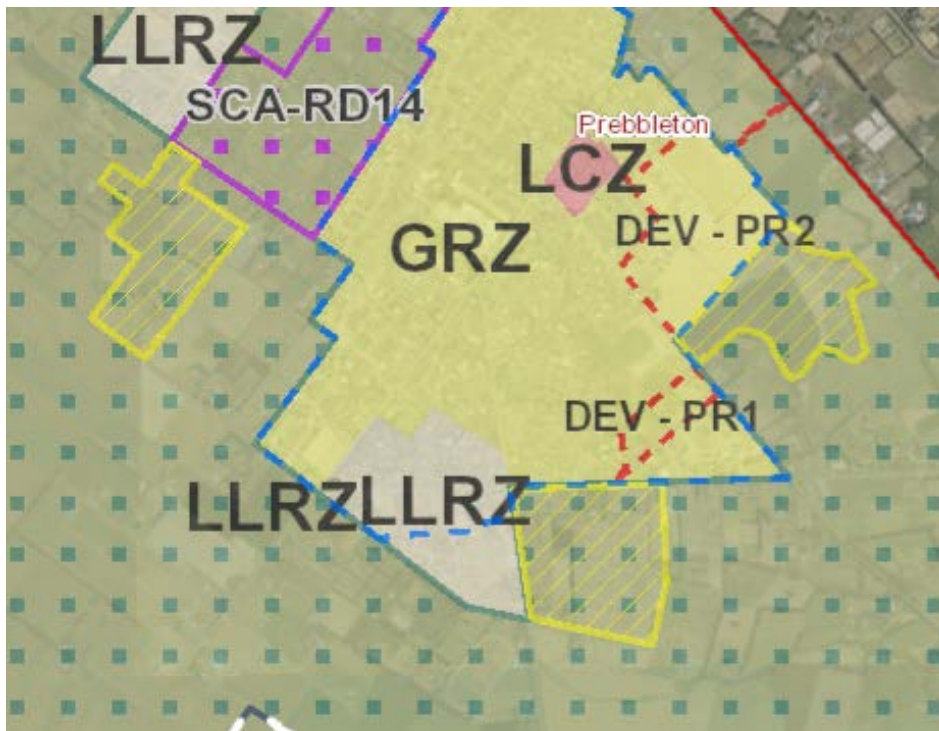


Figure 2. Proposed Zoning Pattern showing the Urban Growth Overlay for the TRRG Site – bottom right yellow hatched (square) area.

NATIONAL POLICY STATEMENT – URBAN DEVELOPMENT 2020

25. Clause 1.3 of the NPS-UD states that the NPS-UD applies to:

- all local authorities that have all or part of an urban environment within their district or region (i.e., tier 1, 2 and 3 local authorities); and
- planning decisions by any local authority that affect an urban environment.

Urban environment means:

any area of land (regardless of size, and irrespective of local authority or statistical boundaries) that:

- a) is, or is intended to be, predominantly urban in character; and*
- b) is, or is intended to be, part of a housing and labour market of at least 10,000 people*

26. My understanding is that Council (SDC), and the Greater Christchurch Partnership (GCP) consider the Greater Christchurch area as a whole is an ‘urban environment’ for the purposes of the NPS-UD. I endorse this interpretation.

27. While I consider the statutory obligation to give effect to the NPS-UD is confined to urban environments, the overall intent should, in my opinion, extend to other settlements/ townships in the District in a general sense. Ensuring that there is adequate zoning to enable the market to function efficiently, and through that address local housing affordability, housing mix, and at the same time promote a compact urban form, are things I consider to be basic planning.

28. The TRRG submission on SD-UDF-02 will also enable this 'basic planning' in settlements beyond Greater Christchurch, as well as for towns in Selwyn that are within the urban environment (including Prebbleton).

CANTERBURY REGIONAL POLICY STATEMENT

29. The PSDP is required to give effect to the CRPS. A key matter for consideration is whether the amendments sought by TRRG will be contrary to the CRPS or are likely to lead to a situation that would create this conflict i.e. used by the Council or landowners as a basis for promoting urban rezoning that could be contrary to the CRPS. I cannot see an issue outside of Greater Christchurch which is subject to the settlement planning provisions of Chapter 5 – Land use and Infrastructure, and the Council has discretion to consider the merits of a proposal against a range of statutory matters.
30. The policies in Chapter 6 – Recovery and Rebuilding of Greater Christchurch, are more prescriptive and it might be argued that the TRRG proposed amendments to SD-UDF-02 would not give effect to those policies and Map A. Land supply has been assumed to be sufficiently provided for over the plan period within the bounds set by Map A and the policies that are behind it, particularly now that Change 1 to the CRPS has been made operative. The Projected Infrastructure Boundary prevents any further expansion of townships, so a PSDP policy that is potentially promoting further peripheral expansion could be seen as not giving effect to the CRPS. However, the additional capacity that might arise from the TRRG submission need not be through additional greenfield development, but through further intensification (e.g. as a result of the Kainga Ora submissions on the PSDP requesting intensification around centres).
31. My view is therefore on balance TRRG's proposed wording is not contrary to the CRPS Chapter 6, but there may be cases where the way it is implemented in the future could be. The form and content of SD-NFD-02 needs to provide a pathway for SDC to consider (and enable) development proposals that fall outside of the prescriptive provisions in the CRPS, as directed by the NPS-UD. Whether or not these proposals succeed will be a matter for SDC decision makers on a case-by-case merits-based assessment.

STRATEGIC DIRECTIONS

32. This pivotal chapter applies to the whole District (SD-Overview):

'This chapter sets out the overarching direction for the District Plan as expressed through Strategic Directions'.

'These directions reflect those factors which are considered to be key to achieving the overall vision for the pattern and integration of land use within Selwyn District. (My emphasis)'.

33. The NPS-UD only has statutory effect over parts of the District i.e. that part within the Urban Environment, being the Greater Christchurch Urban Area. However, as I stated above, I think it is good planning practice to ensure that there is, for example, sufficient land and housing capacities in settlements to meet anticipated demand.

34. As stated in my Overview, the TRRG submission seeks to amend SD-UFD-02 as follows:

*There is **as a minimum** sufficient feasible development capacity in **each township** to meet anticipated demands for housing and business activities.*

35. I note that the Reporting Officer's recommendation is to make a relatively cosmetic amendment which he states is to align the wording with the NPS-UD i.e. replacing 'anticipated' with 'expected'.

*There is sufficient feasible development capacity to meet ~~anticipated~~ **expected** demands for housing and business activities*

However, to align more closely with the actual wording the in NPS- UD, the wording should be:

*There is **at least** sufficient (feasible) development capacity to meet **expected** demands....*

36. I would prefer words 'at least' being used rather than 'as a minimum' as used in the TRRG submission so that it aligns with the wording in the NPS-UD.

ASSESSMENT

37. I can see nothing in SD-UF-02 (Policy 2 in the NPS-UD) that prevents the Council from enabling more than sufficient development capacity to be exceeded under certain circumstances, irrespective of whether a proposed zoning is in the Greater Christchurch portion of Selwyn District. That is what Policy 2 clearly says – Councils should 'at least' provide sufficient capacity, which by implication means that they can supply more. There are likely to be situations where submissions or privately requested plan changes propose sites that promote and support urban form policies, and adverse effects can be avoided, or mitigated. These proposals should not be declined simply because the additional land could create 'oversupply'.
38. Some oversupply can assist in facilitating housing affordability by supporting competitive land and development markets, including land banking, and is likely to be appropriate where the enabled development will contribute to well-functioning urban environments – refer to Objectives 1 and 2 and Policy 1 of the NPS-UD.
39. The counter argument is that oversupply creates an opportunity cost (e.g. loss of amenity or landscapes) or forecloses options for future generations – values can change as we have seen with the 'about-turn' that has occurred with productive soils. A perpetual over supply and decentralisation of jobs and population can create urban decay in older less popular urban areas through 'distributional effects', particularly in periods of stagnant growth. Oversupply of greenfield development can also delay the achievement of intensification objectives, depending on the relative attractiveness of housing choices. But these matters can be assessed on a case-by-case basis having regard to the relevant objectives and policies, including the extent to which these differing areas are 'substitutable'.
40. By accepting this limb of the TRRG submission, it is my opinion that the Council would not be facilitating urban sprawl. Afterall, Kainga Ora has sought through the PSDP that several hundred, if not more, houses be enabled through intensification around centres throughout

the District, potentially adding to oversupply in some settlements. While I see flaws in the approach that Kainga Ora are advocating, in principle the submission has merit but under the Strategic Objective SDS-UFD-02 as it stands the submission could be rejected on the grounds of creating / adding to an oversupply of housing capacity.

41. Highly prescriptive policies seeking to control the release of land can also impede the Councils in allowing proposals that have planning merit. For example, the current subregional policy framework in Chapter 6 of the CRPS is highly prescriptive. Based on my previous experience, this rigid approach has prevented several meritorious land parcels in Christchurch City from being rezoned even though they would have supported the policies both in the Christchurch District Plan and CRPS.
42. In summary, the wording proposed by the first limb of the TRRG submission, and recommended to be rejected in the Officer's Report, would provide some latitude to decision makers to put less emphasis on the existing land supply in situations where a proposal satisfies key policies in the District Plan, and would otherwise give effect to the general policy direction and intent of the CRPS. It is also worth noting that some parts of the CRPS, including the 'rigid immovable' Map A rural/urban boundary are dated, and may not give effect to the NPS-UD.
43. The second limb of the TRRG submission on Strategic Objective SD-UFD-02 seeks that the policy be applied in the context of each township, rather than, as it seems to apply, globally across the District.
44. I acknowledge that the proposed wording in the TRRG submission may create some concern for the GCP, particularly Christchurch City. It may be seen as encouraging further decentralisation in all townships in Greater Christchurch, including setting a precedent for Waimakariri District. This is why the proposed definitions of Township Network and Activity Centre Network are important. I will return to this point later in my evidence.
45. Selwyn has two general settlement planning units: those within the Greater Christchurch area and regarded by the GCP partners as part of the 'urban environment'; and those outside of the Greater Christchurch area as it is currently delineated. For the former, growth allocation will be determined by analysis and modelling through the processes determined by the GCP in the subregional context using mainly the Housing and Business Capacity Assessments. For the latter, (outside of the Greater Christchurch area) the territorial authority will have more autonomy and be influenced by its District Development Strategy and other internal strategic planning documents. Either way, consideration will need to be given to how individual townships function, their capacity to grow, demographics and other factors.
46. Logically, the addition of the words being sought makes sense in my opinion because the key phrase in the objective is 'to meet anticipated / expected demands for housing and business activities'. Where are these anticipated demands going to be met, and how? The NPS-UD makes it clear that the additional capacity must be directed (for the Greater Christchurch area) to where there is high demand²; so growth presumably will be allocated to these areas, subject to contributing to a well-functioning urban environment. Outside of the Greater Christchurch

² e.g. Objective 3 (c) and Policy 3(d)

area the amended wording will connect with the District Development Strategy, and the Township Network.

47. Every Future Development Strategy prepared under the NPS-UD 'must spatially identify: the broad locations in which development capacity will be provided over the long term, in both existing and future urban areas, ...' Every Housing and Business Assessment must estimate, for the short term, medium term and long term, the demand for additional housing in the region and each constituent District of the tier 1 or tier 2 urban environment:

- a) in different locations.
- b) and in terms of dwelling types.

These locations are likely to be towns. In short, I consider that, to give effect to the outcomes and processes in the NPS-UD, the Council cannot avoid referencing its towns, and the Strategic Directions is an appropriate part of the Plan to do it.

48. The NPS-UD definition of 'well-functioning urban environment' likewise is clear that such environments, amongst other matters, are ones which meet housing needs of different households – in terms of type, price, and location. This must be achieved at the regional and district level. In my view it is helpful if the District Plan allocates growth at a township level.
49. The extent of housing and business development will depend on the projected household growth and modelled job growth in each settlement and ultimately their position in the Township Network, and Activity Network. An important part of the Township Network will be the extent to which each settlement is providing for those who wish to 'age in place' and/or move to be close to existing family, friendship, other support networks and/or employment. In the end, it is this planning that will determine how much feasible development capacity will be provided.
50. I do have some problems with the actual wording of the TRRG relief sought because it does not clearly make a distinction between the form, function, and growth potential of different settlements. A possible alternative to the TRRG relief sought may be adding the words:

*"There is **at least** sufficient feasible development capacity **in each township** to meet anticipated demands for housing and business activities, **having particular regard to the Township and Activity Centres Networks**".*

Part (f) of the TRRG submission (Paragraph 20) would appear to me to provide scope for this.

FURTHER SUBMISSIONS ON STRATEGIC DIRECTIONS

51. TRRG lodged numerous further submissions across nearly all the Strategic Directions chapter. I would like to focus on the following submissions which TRRG opposed as these raise some significant matters likely to impact on future zoning decisions.

Christchurch City Council

Christchurch City Council is seeking to amend SD-UFD-03, Urban Growth and Development by adding the following clause at the start of SD-UFD-03 as follows:

Urban growth and development

1. is of a form and density that supports the viable provision of public transport services and provides for well-integrated public transport infrastructure.

~~1~~ 2.... is well-integrated with the efficient provision, including the timing and funding, of infrastructure; and

52. TRRG opposes this submission. Whilst public transport and urban form do have a strong interrelationship, the proposed amendment does not shed any light on what this urban form might be for Selwyn's townships taken as a whole. The Strategic Directions apply to the District and I respectfully suggest that a broader land use / transport integration objective is a more appropriate high-level direction for the District, rather than a single focus on public transport which is going to be less relevant to settlements outside of Greater Christchurch.

53. I consider that any amendment to SD-UFD-03 should be broader than what is being sought through the Further Submission. Wording that reflects Policy 5.3.1 (3), Policy 5.3.8(1) in Chapter 5 of the CRPS or Policy 6.3.4 in Chapter 6 (as italicised below), if considered necessary, could be a more appropriate high-level statement to do with integrating urban form and transport. In any case, I agree with the Reporting Officer, that any additional wording is not necessary as the matter is already addressed in the SDs as notified (see para 18.3 of Officers Report).

*5.3.1 Regional growth (Wider Region). To provide, as the primary focus for meeting the wider region's growth needs, sustainable development patterns that: 1. ensure that any a. urban growth; and b. limited rural residential development occur in a form that concentrates, or is attached to, existing urban areas and promotes a coordinated pattern of development; 2. encourage within urban areas, housing choice, recreation and community facilities, and business opportunities of a character and form that supports urban consolidation; 3. **promote energy efficiency in urban forms, transport patterns, site location and subdivision layout;***

*5.3.8 Land use and transport integration (Wider Region). Integrate land use and transport planning in a way: 1. **that promotes: a. the use of transport modes which have low adverse effects; b. the safe, efficient, and effective use of transport infrastructure, and reduces where appropriate the demand for transport;***

*6.2.4 Integration of transport infrastructure and land use. Prioritise the planning of transport infrastructure so that it maximises integration with the priority areas and new settlement patterns and facilitates the movement of people and goods and provision of services in Greater Christchurch, while: 1. managing network congestion; 2. **reducing dependency on private motor vehicles;** 3. **reducing emission of contaminants to air and energy use;** 4. **promoting the use of active and public transport modes;** 5. optimising use of existing capacity within the network; and 6. enhancing transport safety.*

6.3.4 Transport effectiveness. Ensure that an efficient and effective transport network that supports business and residential recovery is restored, protected, and enhanced so that it maintains and improves movement of people and goods around Greater Christchurch by:

1. avoiding development that will overload strategic freight routes;
2. 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;
3. **providing opportunities for travel demand management;**
4. requiring integrated transport assessment for substantial developments; and
5. improving road user safety.

Horticulture NZ, Federated Farmers

54. These parties seek amendments and additions to the Strategic Directions to give greater emphasis to the protection of Highly Productive Land (HPL)/versatile soils and productive farming as below:

*SD-UFD-01 – matters to be considered when considered when assessing urban growth locations to include addition of **‘potential loss of highly productive land/soils’; ‘avoiding versatile soils’; ‘creation of incompatible activities’; ‘avoid reverse sensitivity effects on approved, existing, and permitted activities**.*

And the addition of a new Strategic Objective:

New Strategic Objective –

Primary production and rural industry activities are able to operate efficiently and effectively and the contribution that they make to the economic and social wellbeing of the district is recognised. Productive and versatile land is retained for primary production to enable production of food. Development is located and designed which enables primary production activities to occur in rural areas and not be constrained by location of incompatible activities adjacent to rural production activities.

55. I agree that highly productive soils, as with any other soils, is a resource that needs to be managed under the Resource Management Act (RMA). But, as raised in various submissions on the Draft National Policy Statement Highly Productive Land (NPS-HPL), there are many thorny issues that the NPS-HPL needs to resolve before settling on a position³. I think it is therefore premature for the Council to commit to a position on the management of highly productive land until the final NPS-HPL comes into effect possibly later this year.

56. Under the current statutory framework there is little priority given to highly productive land or the subset of versatile soils. Unlike the previous Town and Country Planning Act, the RMA does not put highly productive land on a pedestal so to speak. Regional, District and City Plans have therefore had little statutory support for including objectives and policies that absolutely protect high quality soils for production from urban encroachment.

³ See for example submissions on the Draft by Suburban Estates and Christchurch City Council.

57. Experience in Greater Christchurch shows us that a blanket protection of versatile soils/HPL can have unanticipated effects. For example, this approach arguably pushed a lot of development in Christchurch City onto land that, as we found out in the Canterbury earthquakes, was not suited to urban subdivision, at least under the building and subdivision standards employed at the time.
58. There are many contextual factors that will determine the potential value and economic productivity of soils. These include physical characteristics such as permeability, natural fertility, water table and microclimatic conditions, as well as existing subdivision patterns, proximity to residential areas and urban growth advantages obtained from using such soils for housing.
59. The Reporting Officer, in his recommendation, has reached a reasonable compromise in the use of the word 'consider' but in my opinion, if the Panel supports that direction then consideration should be restricted to versatile soils, which has been the term used in Greater Christchurch over the past 20 years. I would suspect the Council may need to change the PSDP to give effect to the forthcoming NPS-HPL. I note that Policy UG9 is to 'recognise and provide for' the finite nature of versatile soils...' and this wording has also been opposed by TRRG.
60. A TRRG property owners (A & B George) has submitted on NPS-HPL (see copy of submission attached as **Appendix 3**).
61. In the Greater Christchurch area, much of the land around townships is already subdivided into 4 ha blocks (or less) and is used for rural lifestyle purposes, rather than productive farming. The existing lot sizes are too small for productive farming.

Fonterra

62. TRRG has opposed the submission by Fonterra seeking that reverse sensitivity effects should be avoided. Reverse sensitivity effects can be mitigated rather than simply avoided by a range of measures including separation distances, controls on lot sizes and shapes, rural/urban edge treatments and landscaping controls. Avoidance only is not an appropriate approach for addressing potential reverse sensitivity effects in this context.
63. The TRRG concern is that 'avoid' is too strong an impediment to development. Reverse sensitivity takes many forms and I consider there is no need for urban development to need to avoid reverse sensitivity effects on established uses in every instance. Also, there are obligations on existing rural land users to manage their activities to internalise effects to the extent practicable.
64. The submission, if accepted, would place a significant constraint on urban expansion, particularly when there are likely to be other constraints as well. If the Panel were of a mind to favourably consider the relief sought, 'avoid or mitigate' would in my view provide the appropriate assessment matter for future plan changes or resource consents. I note the

Reporting Officer has rejected the original submission by Fonterra and I support that recommendation.

TRRG SUBMISSION ON DEFINITIONS

65. The amendments sought by TRRG to Strategic Directions closely align with the submissions of the Definitions chapter. Evidence on that will be presented separately but I consider it may assist the Panel if I briefly introduce those submissions now. The TRRG submission points are mentioned above but for convenience I have repeated them here.

66. TRRG submission point 003 seeks: Amend the definition of Township Network as follows:

*Service Townships - West Melton, Prebbleton, Darfield and Leeston Function is based on providing a high amenity residential environment and primary services to Rural Townships and surrounding rural area. Darfield and Leeston act as Key Activity Centres for the wider district. **Prebbleton whilst a service activity centre is strategically located close to, and well connected to, Rolleston and Lincoln Key Activity Centres and the large and growing Southwest Christchurch industrial and business areas. Given this strategic location it can support a wide range of commercial, industrial, and residential activities, and a larger population (10 000 +) than anticipated for the secondary west Selwyn Key Activity Centres (i.e. Darfield and Leeston)***

67. TRRG Submission point 005 seeks: Amend the definition of Service Activity Centres as follows:
*Provide goods and services to residents of the town as well as the wider rural area. However, there will still be a reliance on the Key Activity Centres for larger scale businesses and more variety in retail and commercial activities. The Selwyn District has two Service Activity Centres being Prebbleton and West Melton. **Prebbleton whilst a service activity centre is strategically located close to, and well connected to, Rolleston and Lincoln Key Activity Centres and the large and growing Southwest Christchurch industrial and business areas. Given this strategic location it can support a wide range of commercial, industrial, and residential activities, and a larger population (10 000 +) than anticipated for the secondary west Selwyn Key Activity Centres (i.e. Darfield and Leeston).***

68. I do not wish to discuss the specific merits of the relief sought here but these two submission points are intricately linked to TRRG's proposed amendment to SD-UDF-02.

69. In my opinion, the relief sought in SD-UDF-02 goes hand in hand with the hierarchical nature of the Township Network and Activity Centres Networks. I have included the full definition of the above in **Appendix 4**.

CONCLUSION

70. I consider that the TRRG submission on Strategic Directions SD-UDF-02 will add clarity and precision that will assist decision makers to administer, develop and monitor effective strategic planning documents for townships in the Selwyn District. It will also improve the integration between higher level documents and the emerging Urban Growth policies in the PSDP.

71. The final form of the TRRG relief sought to SD-UDF-02 is as follows:

*There is **at least** sufficient feasible development capacity **in each township** to meet **expected** demands for housing and business activities*

72. Specifying that the requirement for enabling 'at least' sufficient development capacity' in 'each township' will assist the Council in maintaining or adjusting its Township Network and Activity Centre Network by managing the planned capacity of those townships according to their function in Greater Christchurch and the wider District. This links into the Definitions chapter and separate evidence will be prepared for that.

73. Adding the words 'at least' (or similar) will provide some flexibility for the Council to approve or adopt proposals that positively contribute to the economic and social wellbeing of the community. However, such proposals will still need to be consistent with the objectives and policies in the Urban Growth chapter.

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APPENDICES

- Appendix 1 Council's summary of TRRG Submission.**
- Appendix 2 Proposed Policy UG-P13 – TRRG Submission.**
- Appendix 3 George submission on Proposed National Policy Statement on Highly Productive Soils.**
- Appendix 4 Township and Activity Centre Networks Definitions**

APPENDIX 1 -TRRG SUMMISSIONS AS SUMMARISED.

APPENDIX 2 PROPOSED UG P-13 TRRG SUBMISSION

**APPENDIX 3 TGG SUBMISSION ON PROPOSED NATIONAL POLICY STATEMENT ON HIGHLY
PRODUCTIVE SOILS**

APPENDIX 4 PROPOSED TOWNSHIP NETWORK AND ACTIVITY CENTRES NETWORK DEFINITIONS