

**BEFORE INDEPENDENT HEARING COMMISSIONERS  
AT SELWYN**

**I MUA NGĀ KAIKŌMIHANA WHAKAWĀ MOTUHAKE  
HEREWINI**

**IN THE MATTER OF** the Resource Management Act 1991

**AND**

**IN THE MATTER OF** of the hearing of submissions on the  
Proposed Selwyn District Plan

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**STATEMENT OF EVIDENCE OF NICOLAS JON ROBERTS  
ON BEHALF OF KĀINGA ORA – HOMES AND COMMUNITIES  
(SUBMITTER DPR-414)**

**Planning**

**Hearing 1 - Strategic Directions**

**23 July 2021**

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## 1 INTRODUCTION

- 1.1 My name is Nicolas (Nick) Jon Roberts. I am a Director of Barker & Associates, an independent, specialist planning consultancy with five offices throughout New Zealand, including Christchurch. I have been in this position since 1997.
- 1.2 I hold the Degree of Bachelor of Planning from the University of Auckland. I am a full member of the New Zealand Planning Institute and a member of the Resource Management Law Association, the Auckland Urban Design Panel, and recipient of the Nancy Northcroft Planning Practice Award.
- 1.3 My relevant experience includes:
- (a) Wellington Regional Policy Statement - preparation of submissions, evidence presentation and mediation in relation to the hierarchy of centres and the distribution of retail activity.
  - (b) Palmerston North City District Plan - preparation of hearing evidence and attendance at mediation in relation to retail activity objectives, policies and methods.
  - (c) Preparation of the Proposed Auckland Unitary Plan (PAUP) City Centre zone objectives, policies and methods, including preparation of planning evidence for Topic 050 City Centre.
  - (d) Planning lead for the preparation of resource consent for the Halswell Town Centre in Christchurch.
  - (e) Lead planner for Auckland Council on the Residential topics submissions as part of the PAUP process. This included leading mediation, preparation and presentation of evidence for Auckland Council.
  - (f) Preparation of a number of plan changes on behalf of the previous Auckland City Council, including Plan Change 2 to the Operative Plan – implementing urban design controls across the Central City and Plan Change 4 – which provided for the redevelopment of Wynyard Quarter.

- (g) Preparation of multiple plan changes to the Auckland unitary Plan to rezone 400 hectares of land for a new metropolitan centre and housing at Drury.
- (h) Section 42A reporting office for the Stage 3 Queenstown Lakes District Proposed District Plan Three Parks zone, a mixed use zone at Wanaka, including preparation of evidence and hearing attendance.
- (i) Development of guidance for the National Policy Statement on Urban Development, including attendance at workshops with Ministry for the Environment and Ministry of Housing and Urban Development.

## 2 **CODE OF CONDUCT**

- 2.1 I have read and am familiar with the Environment Court's Code of Conduct for Expert Witnesses, contained in the Environment Court Practice Note 2014, and agree to comply with it. My qualifications as an expert are set out above. Other than where I state that I am relying on the advice of another person, I confirm that the issues addressed in this statement of evidence are within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

## 3 **EXECUTIVE SUMMARY**

- 3.1 Kāinga Ora made 14 submission points in relation to the Strategic Directions of the PDP.
- 3.2 Of the 14 submission points made, 11 supported the provisions as notified.
- 3.3 The key points addressed in my evidence relate to four remaining points of contention between Kāinga Ora and the recommendations of the reporting officer as set out in the s42A report. Those remaining points of contention relate to the following provisions and submission points.

- 3.4 Kāinga Ora is seeking amended wording of objective SD-DI-O1 Sensational Selwyn (submission point 002) as follows:

"Selwyn is an attractive and pleasant place to live, work, and visit, where development:

1. takes into account the character of ~~individual communities~~ planned urban and non-urban form;
2. is well-connected, safe, accessible, and resilient; and
3. enhances environmental, economic, cultural, and social, and health outcomes for the benefit of the entire District.";

- 3.5 Kāinga Ora is seeking amended wording of objective SD-UFD-O1 Compact and Sustainable Township Network (submission point 012) as follows:

"Urban growth is located only in or around ~~adjoining~~ existing townships and in a compact and sustainable form that aligns with its anticipated role in the Township Network, while responding considering to the community's needs, natural landforms, cultural values, highly productive land, and physical features.";

- 3.6 Kāinga Ora is seeking amended wording of objective SD-UFD-O2 Urban Growth and Development (submission point 013) as follows

"There is at all times at least sufficient feasible development capacity to meet expected demands for housing and business activities"; and

- 3.7 Kāinga Ora is seeking to move the Urban Growth Objectives into the Strategic Directions section (submission point 014).

- 3.8 The proposed additional changes sought by Kāinga Ora are included in Appendix 1 of my evidence.

- 3.9 With the exception of the four remaining points of contention outlined above, I concur with and support the recommendations of the reporting officer set out in the s42A report on the Strategic Directions section, this includes the provisions that Kāinga Ora supported as notified that have been the subject of amendment in the s42A report.

- 3.10 I consider that the amendments sought by Kāinga Ora, as outlined in this evidence and summarised in Appendix 1, will be efficient and effective in achieving the purpose of the RMA, the relevant objectives of the PDP and other relevant statutory documents including the CRPS, planning standards and the NPSUD.

#### 4 **SCOPE**

- 4.1 This evidence is presented on behalf of Kāinga Ora – Homes and Communities (**Kāinga Ora**). This evidence addresses Kāinga Ora’s submission points, and further submission points on the strategic directions within the Selwyn Proposed District Plan (**the PDP**), as they relate to the recommendations of the Selwyn District Council (**SDC**) s42A report on those topics.
- 4.2 In preparing my evidence, I have reviewed:
- (a) The PDP.
  - (b) SDC’s Section 32 Strategic Directions report.
  - (c) SDC’s Section 42A Proposed District Plan Overview report.
  - (d) SDC’s Section 42A Strategic Directions report.
- 4.3 Kāinga Ora made 14 submission points in relation to the Strategic Directions chapter of the PDP. With the exception of the four remaining points of contention outlined below, I concur with the recommendations of the reporting officer set out in the s42A report on the Strategic Directions chapter.
- 4.4 The following objectives, and the corresponding points made in the Kāinga Ora submission remain in contention:
- (a) SD-DI-O1 Sensational Selwyn;
  - (b) SD-UFD-O1 Compact and Sustainable Township Network;
  - (c) SD-UFD-O2 Urban Growth and Development; and
  - (d) Kāinga Ora’s submission seeking to move the Urban Growth Objectives into the Strategic Directions section.

4.5 My evidence is structured as follows:

- (a) Background and high level position;
- (b) Key points of contention;
- (c) Additional comments on objectives where Kāinga Ora is in agreement with the reporting officer;
- (d) Summary of proposed wording changes sought; and
- (e) Conclusion.

## 5 **BACKGROUND / HIGH LEVEL POSITION**

- 5.1 Kāinga Ora currently has a small number of existing land holdings and interests within the Selwyn District (**the District**), but has a specific interest in the District in terms of its contribution to housing and urban development within Greater Christchurch.
- 5.2 Kāinga Ora seeks that the PDP enables a range of housing typologies to be delivered in appropriate locations and contribute to the provision of quality, affordable housing choices that meet the diverse needs of the community.
- 5.3 Overall, Kāinga Ora considers that the PDP does not adequately provide for the long-term residential development capacity needed to meet the population growth expected in the Selwyn District.
- 5.4 The National Policy Statement on Urban Development 2020 (**NPSUD**) seeks to deliver well-functioning urban environments (Objective 1). The NPSUD further seeks to ensure that planning decisions improve housing affordability by supporting competitive land and development markets (Objective 2).
- 5.5 The NPSUD identifies SDC as a Tier 1 local authority for the Tier 1 urban environment of Christchurch.
- 5.6 Of particular relevance to the Selwyn District, the NPSUD directs district plans to enable more people to live in areas of an urban environment near a centre zone or other areas with many employment opportunities (Objective 3).

- 5.7 The NPSUD focuses on the identification and promotion of the future character/amenity of urban environments, rather than protection and preservation of existing amenity. (Objectives 1 and 4).
- 5.8 Kāinga Ora considers that the PDP does not sufficiently recognise that, as the character of planned urban areas evolves to deliver a compact urban form, amenity values may change.
- 5.9 Kāinga Ora considers that the objectives and policies of the strategic directions chapter are key to ensuring that the PDP adequately provides for long-term residential development capacity and well-functioning urban environments in accordance with the NPSUD.
- 5.10 As proposed, the strategic directions chapter does not in my view adequately provide the high level strategic direction necessary to ensure that the PDP provides for future growth, residential development capacity, and ongoing housing affordability in a manner consistent with the NPSUD.
- 5.11 I consider that amendments are needed to ensure that the PDP appropriately responds to the NPSUD's requirements. Amendments are also required to achieve consistency with the National Planning Standards (**the Planning Standards**).

## 6 **SD-DI-O1 SENSATIONAL SELWYN**

- 6.1 The submission by Kāinga Ora supports, in part, the proposed objective but seeks amendments to the wording to recognise that urban environments change over time, in accordance with the direction set by the NPSUD. The amended wording requested by Kāinga Ora aligns with this direction<sup>1</sup> by replacing the "character of individual communities" with the "planned urban form".
- 6.2 In the s42A report, the reporting officer has recommended that the requested amendment to Objective SD-UFD-01 be rejected and that the provision largely be retained as notified with the exception of a

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<sup>1</sup> NPSUD Policy 6

minor wording change. The reporting officer rejects Kāinga Ora's request for the following reasons:

- (a) The wording proposed would narrow the scope of the objective, rendering it only applicable to urban areas and excluding non-urban areas.
- (b) The objective does not expressly stipulate that the 'existing' character of the individual community needs to be taken into account. The current wording is open enough to allow for either the existing character or Plan enabled character to be taken into account. The objective leaves it up to the zone based chapters to decide between maintaining the existing character of an area, or the anticipated character of an area. Essentially the determined character of an area is derived from what the Plan's more refined provisions enable, the basis of which is derived from this overarching objective.
- (c) Regarding Policy 6 of the NPSUD and the need for planning decisions to have regard to the planned urban form, this can occur under the proposed framework, and again is linked back to the anticipated outcomes for each zone as prescribed by the zone based provisions.

6.3 I agree in part with the reporting officer on the first point above, that the requested amendment could be interpreted to exclude consideration of non-urban areas. This is not the intention of Kāinga Ora and I consider that this issue could be addressed by amending the wording to refer to the "planned urban and non-urban form" to ensure that the objective captures non-urban areas. This change still achieves the direction sought by the NPSUD Policy 6.

6.4 I do not agree with the other two points, outlined above, made by the reporting officer to justify rejecting Kāinga Ora's requested amendments to objective SD-DI-O1. The intention of Kāinga Ora's submission on this objective is to ensure that the objective is forward looking and seeks to address the planned form of the District rather than to prioritise the existing character. This aligns with NPSUD Objective 4 to ensure that New Zealand's urban environments, including their amenity values, develop and change over time in



response to the diverse and changing needs of people, communities, and future generations.

- 6.5 In my view, the proposed wording of the objective directing development to take into account “the character of individual communities”, means taking into account “existing character”. I do not consider this gives effect to the NPSUD. I also do not agree that relying on the zone based chapters to decide between maintaining the existing character of an area, or the anticipated character of an area is appropriate. In my opinion, the NPSUD is clear that existing character should be enabled to develop and change over time as the needs of future communities change. For these reasons, I consider that the strategic direction should set a clear basis for the consideration of planned future form not simply existing form at the highest level of the PDP.
- 6.6 I further consider the planned urban form for each zone can also be expressed in the objectives of the individual zones, in addition to the direction provided in the Strategic Direction chapter, rather than in place of it. This recognises that planned future form may vary between individual zones in response to local issues, including anticipated amenity values.
- 6.7 I therefore propose the following amendment to the s42A version of SD-DI-O1. Deletions shown in strikethrough, additions underlined:

Selwyn is an attractive and pleasant place to live, work, and visit, where development:

1. takes into account the ~~character of individual communities~~ planned urban and non-urban form;
2. is well-connected, safe, accessible, and resilient; and
3. enhances environmental, economic, cultural, and social, and health outcomes for the benefit of the entire District.

## 7 **SD-UFD-O1 COMPACT AND SUSTAINABLE TOWNSHIP NETWORK**

- 7.1 Kāinga Ora's submission supports this objective and seeks its retention as proposed.
- 7.2 The reporting officer has recommended amending this objective in response to a submission point from Christchurch City Council (**CCC**) to replace 'around' with 'adjoining'. According to the reporting officer this amended wording is in order to clarify that "urban growth is only intended to occur in areas adjoining an existing urban area"<sup>2</sup>.
- 7.3 The reason set out in the CCC submission is to ensure that "urban growth areas develop in an efficient manner that supports the provision of infrastructure and services, including public transport and the achievement of consolidation". While I support this principle, I do not agree with the reporting officer's rationale and consider that the amended wording is overly narrow and may serve to inappropriately constrain the areas in which new urban growth may occur. Efficient development that supports infrastructure and services, public transport use and consolidation does not necessarily require land to "adjoin" existing townships. Provided the land is located within walking distance to townships, is supported by a structure plan and coordinated with staged infrastructure delivery, a well-functioning urban environment can still be achieved.
- 7.4 The notified wording of 'around' better enables development capacity in accordance with the requirements of the NPSUD<sup>3</sup> while still ensuring that growth is planned and located in close proximity to existing townships. Requiring urban growth to be adjoining requires it to be 'next to' existing urban areas. There may be instances where growth areas are not immediately next to, but in close proximity to existing urban areas, that may be appropriate for urban expansion and it would be inappropriate to exclude consideration of such areas by virtue of the strategic objectives.

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<sup>22</sup> S42A paragraph 16.3

<sup>3</sup> NPSUD Objectives 2, 3, 6 in particular

- 7.5 The Canterbury Regional Policy Statement (**CRPS**) provides support for this in Objective 6.2.2. This objective seeks to provide for *“the development of greenfield priority areas 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”*.
- 7.6 Use of the phrase “on the periphery” achieves a similar outcome as sought by Kāinga Ora in this submission, in that it ensures growth around existing development but is not so restrictive as to require it to be immediately adjacent.
- 7.7 Therefore, I support retention of the wording of the objective as notified, and propose the following amendment to the s42A version of the objective:

Urban growth is located only in or around ~~adjoining~~ existing townships and in a compact and sustainable form that aligns with its anticipated role in the Township Network, while responding considering to the community’s needs, natural landforms, cultural values, highly productive land, and physical features.

## 8 **SD-UFD-O2 URBAN GROWTH AND DEVELOPMENT**

- 8.1 Kāinga Ora’s submission supports the notified objective in part but seeks amendments to the wording to better align with the direction of the NPSUD around development capacity.
- 8.2 In the s42A report the reporting officer accepts this request in part and recommends replacing ‘anticipated’ with ‘expected’ as requested by Kāinga Ora, but does not support the inclusion of ‘at all times at least’ and ‘land over the short term, medium term and long term’. The reporting officer considers that these additional words are unnecessary as these aspects are inherently included in the existing wording of the objective.
- 8.3 I acknowledge and support the recommendation of the reporting officer to replace ‘anticipated’ with ‘expected’ in accordance with the change requested by Kāinga Ora to better align with the wording of the NPSUD.

- 8.4 I do not oppose the reporting officer's rejection of Kāinga Ora's request to include the words 'land over the short term, medium term and long term' as despite this wording being included in Policy 6 of the NPSUD, I accept this is inherent in 'at all times'. However, I consider it necessary to include 'at all times at least' in order to give effect to, and to achieve consistency with, Policy 2 of the NPSUD. I note that the words 'at all times, provide at least' were introduced to the NPSUD when it replaced the earlier National Policy Statement on Urban Development Capacity 2016 (NPSUDC) in 2020. Policy 2 of the NPSUD states:

"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."

- 8.5 By contrast the equivalent policy, PA1, in the NPSUDC had the following wording:

(a) "Local authorities shall ensure that *at any one time* there is sufficient housing and business land development capacity..".

- 8.6 The change from 'at any one time', to 'at all times, provide at least' is significant and signals that *sufficient development capacity* must be provided for as a minimum rather than an ultimate target.

- 8.7 The CRPS has not yet been updated to reflect the stronger wording of the NPSUD, in particular Policy 2 of the NPSUD which very clearly anticipates local authorities seeking to achieve a higher standard than simply "sufficient".

- 8.8 The requirements in Policy 2 are repeated in the implementation section of the NPSUD which again refers to "at least sufficient development capacity" and to "the short, medium and long term" (which, as discussed above would not be necessary provided "at all times" is included in the objective).

- 8.9 The NPSUD further requires that if a local authority determines that there is insufficient development capacity over the short, medium or long term then it must take immediate steps to increase capacity. The

requirement for such steps has not yet been reflected in the CRPS but the opportunity to ensure the PDP gives effect to the NPSUD is available now and should be taken in order for the PDP to give effect to the NPSUD.

- 8.10 I therefore propose the following amendment to the s42A version of SD-UFD-O2:

There is at all times at least sufficient feasible development capacity to meet expected demands for housing and business activities.

## **9 MOVING THE URBAN GROWTH OBJECTIVES INTO THE STRATEGIC DIRECTIONS CHAPTER**

- 9.1 As stated in Kāinga Ora's submission, the objectives and policies included under the *Urban Growth* chapter are key strategic objectives and policies and direct how urban growth and intensification is managed in the District. In its submission Kāinga Ora requested the strategic objectives and policies for *Urban Growth*, which are currently included in the *Urban Growth* chapter under the *General district-wide matters* heading, be shifted into the Strategic Directions section.
- 9.2 In the s42A report, the reporting officer has recommended that the requested amendment be rejected and that the *Urban Growth* objectives and policies remain under the *General district-wide matters* heading. The reporting officer has provided the following reasons for rejecting this request:
- (a) While the Strategic Directions Chapter contains (by way of mandatory direction under the National Planning Standards) a sub-chapter dealing with urban form and development, it only does so at a high level and then relies on the Urban Growth Chapter that has the specific purpose of dealing with urban growth management in the district. The strategic objectives should be kept broad and outcome focused rather than specifically addressing the issues of urban growth in detail.
- 9.3 This is little justification for why the *Urban growth* objectives and policies are best placed outside both the *Strategic Directions* heading

and the mandatory *Urban form and development* chapter. Clearly the proposed *Urban Growth* objectives and policies relate to the *Urban form and development* topic. In this context they could be considered synonymous phrases and those objectives and policies should be located within the Urban form and development chapter of the Strategic Directions. The headings provided for the groups of policies within the *Urban Growth* chapter of the PDP are *Urban Growth*, *Urban Form*, and *Development Capacity*. This further demonstrates that the *Urban Growth* chapter sets out content relating to *Urban Form and Development*, and that it is necessary to move these objectives and policies into to the *Urban Form and Development* chapter under the *Strategic Directions* heading.

9.4 As set out in both the s32 report and the s42A report, the Strategic Directions are intended to outline key strategic or significant resource management matters for the district; in fact they are required to do so by the Planning Standards. It is unclear why the reporting officers consider such key matters, matters that can be designed to have primacy over other objectives and policies in the plan and are intended to guide decision making, need to be “broad”. In my experience matters of such importance should be explicit in what they seek and careful attention should be paid to ensuring that they are able to achieve what is intended.

9.5 The Planning Standards include the following in respect of Strategic Directions as **mandatory** directions:

“If the following matters are addressed, they must be located under the Strategic direction heading:

- a. an outline of the key strategic or significant resource management matters for the district
- b. issues, if any, and objectives that address key strategic or significant matters for the district and guide decision making at a strategic level
- c. policies that address these matters, unless those policies are better located in other more specific chapters

d. how resource management issues of significance to iwi authorities are addressed in the plan.”<sup>4</sup>

A further mandatory direction of the Planning Standards is that an “Urban form and development chapter must be included under the Strategic direction heading”.

- 9.6 The PDP **must** contain an Urban form and development chapter within the Strategic Directions and any objectives and policies relating to “key strategic or significant resource management matters for the district”, relating to any topic not just urban form, **must** be located within the Strategic Directions. The directions are mandatory and emphatic. Any of the Urban Growth objectives and policies that meet the requirement in Part 7.1(a) of the Planning Standards must be included within the Strategic Directions and cannot be moved to a generic “catch all” chapter.
- 9.7 In making *Urban form and development* the only mandatory topic of a strategic directions chapter, the National Planning Standards recognise the central and important role that is played by such provisions in achieving the purpose of the RMA. I agree with this status, particularly given the clear additional direction in this area recently set out in the NPSUD.
- 9.8 The purpose of the Planning Standards is to provide national consistency in district plans (as well as regional plans and regional policy statements). In using the alternative wording of *Urban growth* for district plan content that reasonably falls under the purview of the *Urban form and development* chapter, the PDP departs from this consistency and results in the PDP failing to give effect to the planning standards as required by the RMA.
- 9.9 According to the s32 report “the role of a strategic objective is to provide the overall context for the district plan, the overarching direction for other chapters through high level objectives that provide an integrated policy framework for the district as a whole, and sets the land use pattern of Selwyn.” I agree with this description of the role of a strategic direction objective for the PDP. The objectives of the

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<sup>4</sup> National Planning Standards, Part 7.1

Urban Growth chapter are crucial for setting the land use pattern of Selwyn and therefore are better placed under the *Strategic direction* heading to ensure that this provides the overarching direction and integrated policy framework needed for other chapters to appropriately give effect to the NPSUD.

- 9.10 The section 32 report for this chapter states that “*strategic objectives should have primacy, and that all other provisions should be expressed and achieved in a manner consistent with the strategic objectives, subject to RMA requirements*”, and that there should be a clear hierarchy between strategic objectives and chapter specific objectives. This implies that demoting urban growth objectives and policies to the *General district-wide matters* heading was deliberately intended to give it a secondary status. This is inconsistent with the clear priority given to *Urban form and development* in the Planning Standards, and with the Selwyn District being identified as part of a Tier 1 urban environment under the NPSUD.

## 10 AREAS OF SUPPORT

- 10.1 Other than on the four key points outlined above where Kāinga Ora is seeking changes, I agree with and support all other recommendations of the reporting officer set out in the s42A report, for the reasons that the reporting officer has specified.
- 10.2 In particular I note that a number of infrastructure providers have sought changes to objectives in the Strategic Directions chapter to specifically provide for their particular type of infrastructure and in several cases requiring adverse effects from ‘incompatible development and activities’ be avoided, including reverse sensitivity effects. I do not support the identification of particular types of infrastructure being included in the strategic objectives. Nor do I support the level of detail some submitters have sought to be included, such as the identification of buffer corridors for electricity distribution<sup>5</sup>. In my opinion such detail is better included in the Infrastructure chapter. I consider the objectives are appropriately framed as high level directions on the outcomes for the District, and do not need to include specific reference to each type of important infrastructure. In

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<sup>5</sup> Orion New Zealand Limited



my opinion the objectives achieve an appropriate balance of enabling and protecting infrastructure, while not explicitly precluding other development.

10.3 In relation to SD-IR-02 (Effects of Important Infrastructure) I concur with the analysis and recommendation of the reporting officer in rejecting the requested relief of Orion New Zealand Limited, Fonterra Limited, Christchurch International Airport Limited (**CIAL**), and Midland Port, Lyttelton Port Company Limited.

10.4 Similarly, in relation to SD-UFD-03 (Integration of Land Use and Infrastructure) I concur with the analysis and recommendation of the reporting officer in rejecting the requested relief of Fonterra Ltd, CIAL, and Midland Port, and Lyttelton Port Company Limited.

## 11 **SUMMARY OF PROPOSED WORDING CHANGES SOUGHT**

11.1 The proposed additional changes sought by Kāinga Ora are included in **Appendix 1** of my evidence. I can confirm that the version of relief in my evidence represents the full “updated” set of relief requested by Kāinga Ora in relation to this hearing topic. Other than the specific additional changes sought by Kāinga Ora and set out in this evidence and Appendix 1, I support the wording of the Strategic Directions objectives as recommended by the reporting officer in the s42A report.

## 12 **CONCLUSION**

12.1 I consider that the amendments sought by Kāinga Ora, as outlined in this evidence and summarised in Appendix 1, will be efficient and effective in achieving the purpose of the RMA, the relevant objectives of the PDP and other relevant statutory documents including the CRPS, Planning Standards and the NPSUD.

**Nick Roberts**

**23 July 2021**

## Appendix 1 - Proposed Text Changes

Black Text – Officer’s recommended wording, as set out in Section 42a reports.

Red Text – Additional changes proposed by Kāinga Ora.

Strategic Direction	
District Identity	
SD-DI-01	<p>Selwyn is an attractive and pleasant place to live, work, and visit, where development:</p> <ol style="list-style-type: none"> <li>1. takes into account the <del>character of individual communities</del> <u>planned urban and non-urban form</u>;</li> <li>2. is well-connected, safe, accessible, and resilient; and</li> <li>3. enhances environmental, economic, cultural, and social, and health outcomes for the benefit of the entire District.</li> </ol>
Urban Form and Development	
SD-SFD-01	<p>Urban growth is located only in or <u>around adjoining</u> existing townships and in a compact and sustainable form that aligns with its anticipated role in the Township Network, while responding considering to the community’s needs, natural landforms, cultural values, highly productive land, and physical features.</p>
SD-SFD-02	<p>There is <u>at all times at least</u> sufficient feasible development capacity to meet expected demands for housing and business activities.</p>