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Christchurch City Council's Further Submissions on errata submissions on the Proposed Selwyn District Plan

### Introduction

1. Christchurch City Council (the Council) thanks Selwyn District Council (SDC) for the opportunity to make further submissions on the errata submissions on the Proposed Selwyn District Plan (the plan). The Council's further submissions in support or opposition to primary submissions lodged on the plan are attached as Attachment A.
2. The names of the further submitters, the particular submission points supported or opposed, and the decisions sought in respect of the primary submissions of submitters is indicated in Attachment A.
3. The Christchurch City Council made submissions on the Plan – Submitter ID DPR-0032.
4. The Christchurch City Council has an interest in the proposal that is greater than the interest of the general public in that it is a territorial authority that represents an adjoining community which is potentially directly affected by provisions of the Plan.
5. The Christchurch City Council wishes to be heard in support of our further submissions and is willing to consider presenting a joint case with others making similar submissions.

Thank you for the opportunity to provide this submission. For any clarification on points within this submission please contact David Falconer [David.Falconer@ccc.govt.nz](mailto:David.Falconer@ccc.govt.nz)

Yours faithfully



Jane Davis  
General Manager  
Infrastructure, Planning and Regulatory Services

ATTACHMENT A: Christchurch City Council further submissions on the Proposed Selwyn District Plan

Submitter ID	Submitter Name	The particular parts of the primary submission supported or opposed			Support or Oppose	Reasons for support or opposition	Decision sought
		Submission point number	Proposed Selwyn District Plan Provision	Submission point summary			
DPR-0033	Davina Louise Penny	003	GRUZ - New	Amend Proposed District Plan to include Highly Productive Land (Land Use Classes 1 - 3) and to ensure it is protected in line with the Proposed National Policy Statement on Highly Productive Land. Include 'land use' as well as 'development' to avoid loopholes being exploited. (new policy)	Support	Highly productive land is a scarce resource that is important both locally and nationally and deserves protection. This is reflected in the proposed National Policy Statement for Highly Productive Land.  Such land should be protected from urban development and non-urban activities that effectively remove the primary production potential of such land.	Introduce a new policy that protects highly productive land from both urban development and other activities that effectively remove its primary production potential.
DPR-0126	Foster Commercial	001	SD-DI-05	Amend as follows:  <del>Selwyn's hierarchy of activity centres are the preferred location for shopping leisure, culture, entertainment and social interaction in accordance with their anticipated role within in the Activity Centre Network.</del>	Oppose	The hierarchy of activity centres is important not just for recognising and distinguishing the different roles of centres and their integration with infrastructure and facilities within Selwyn District, but also how those centres fit within the wider Greater Christchurch area. The hierarchy assists in achieving a well-functioning	Retain the objective as currently worded.

						<p>urban environment and also provide certainty to inform decisions.</p> <p>These matters are relevant for centres within Christchurch City, particularly the Central City and Key Activity Centres.</p> <p>Removing the hierarchy of centres would be inconsistent with the RPS and could present a risk of development one centre adversely affecting the function of other centres.</p>	
DPR-0157	Kevin & Bonnie Williams	002	SD-UFD-02	<p>Amend as follows:</p> <p>There is <del>sufficient as a minimum, ample</del> feasible development capacity to meet anticipated demands for housing and business activities.</p>	Oppose in part.	<p>It is appropriate to provide, as a minimum, sufficient development capacity for anticipated future demand, but that should include some buffer to provide for the possibility that future demand exceeds that predicted. However, providing for excessive development capacity can result in inefficiencies, poor integration with infrastructure provision, and not achieving a well - functioning urban environment. The NPS -UD already requires a buffer to be included in the calculation of the required development capacity, and seeks provision of "at least sufficient development capacity" (Policy 2).</p>	<p>Amend the objective as follows; "There is <u>at least</u> sufficient feasible development capacity ..."</p>

						Wording along those lines would be more appropriate.	
DPR-0176	Brent Macaulay & Becky Reid	002	SD-UFD-O2	Amend Strategic Directions SD-UFD-O2 to read:  There is <del>sufficient</del> <u>as a minimum, ample</u> feasible development capacity to meet anticipated demands for housing and business activities.	Oppose in part.	It is appropriate to provide, as a minimum, sufficient development capacity for anticipated future demand, but that should include some buffer to provide for the possibility that future demand exceeds that predicted. However, providing for excessive development capacity can result in inefficiencies, poor integration with infrastructure provision, and not achieving a well - functioning urban environment. The NPS -UD already requires a buffer to be included in the calculation of the required development capacity, and seeks provision of "at least sufficient development capacity" (Policy 2). Wording along those lines would be more appropriate.	Amend the objective as follows; "There is <u>at least</u> sufficient feasible development capacity ..."
DPR-0180	Peter & Christine Bond	003	SD-UFD-O2	Amend SD-UFD-O2 to read: There is <del>sufficient</del> <u>ample</u> feasible development capacity to meet anticipated demands for housing and business activities.	Oppose in part	It is appropriate to provide, as a minimum, sufficient development capacity for anticipated future demand, but that should include some buffer to provide for the possibility that future demand exceeds that predicted. However, providing for excessive development capacity can result in inefficiencies, poor integration with infrastructure	Amend the objective as follows; "There is <u>at least</u> sufficient feasible development capacity ..."

						provision, and not achieving a well - functioning urban environment. The NPS -UD already requires a buffer to be included in the calculation of the required development capacity, and seeks provision of “at least sufficient development capacity” (Policy 2). Wording along those lines would be more appropriate.	
DPR-0209	Manmeet Singh	003	SD-UFD-02	Amend Strategic Directions SD-UFD-02 to read:  There is <del>sufficient</del> <u>as a minimum, ample</u> feasible development capacity to meet anticipated demands for housing and business activities.	Oppose in part	It is appropriate to provide, as a minimum, sufficient development capacity for anticipated future demand, but that should include some buffer to provide for the possibility that future demand exceeds that predicted. However, providing for excessive development capacity can result in inefficiencies, poor integration with infrastructure provision, and not achieving a well - functioning urban environment. The NPS -UD already requires a buffer to be included in the calculation of the required development capacity, and seeks provision of “at least sufficient development capacity” (Policy 2). Wording along those lines would be more appropriate.	Amend the objective as follows; “There is <u>at least</u> sufficient feasible development capacity ...”
DPR-0358	Rolleston West Residential	399 - 432	Non-notification clauses	Insert the following words, or words to the like effect, to all controlled and restricted discretionary activity rules:	Oppose in part.	Applications should be limited or publicly notified if neighbouring properties, communities, or the	Do not limit notification where

	Limited (RWRL)			<u>Applications shall not be limited or publicly notified, on the basis of effects associated specifically with this rule and the associated matters of control or discretion.</u>		wider district are potentially directly affected and the adverse effects are potentially more than minor or where the Act requires notification.	neighbouring properties, communities, or the wider district are potentially directly affected and the adverse effects are potentially more than minor or where the Act requires notification.
DPR-0363	Iport Rolleston Holdings Limited (IRHL)	424 - 457	Non-notification clauses	<p>Insert the following words, or words to the like effect, to all controlled and restricted discretionary activity rules:</p> <p><u>Applications shall not be limited or publicly notified, on the basis of effects associated specifically with this rule and the associated matters of control or discretion.</u></p>	Oppose in part	Applications should be limited or publicly notified if neighbouring properties, communities, or the wider district are potentially directly affected and the adverse effects are potentially more than minor or where the Act requires notification.	Do not limit notification where neighbouring properties, communities, or the wider district are potentially directly affected and the adverse effects are potentially more than minor or where the Act

							requires notification.
DPR-0373	Foodstuffs South Island Limited & Foodstuffs (South Island) Properties Limited	003 - 006	New	Amend PSDP to accommodate supermarkets (including associated access, carparking and retail activities) by expressly providing for supermarkets in the objectives, policies and rules of the PSDP for a range of centres, and to provide for supermarkets outside of centres where there is a demonstrated need.	Oppose	<p>It would be inappropriate for the objectives, policies and rules to provide for supermarkets in all locations, as there will be locations that are not suitable for a variety of different reasons. It would also be inconsistent with the Canterbury Regional Policy Statement direction that commercial activities are primarily directed to centres.</p> <p>It could also impact on the functions of centres if supermarkets are enabled outside the areas within which they are provided for. In some locations supermarkets may have effects within Christchurch City, including effects on centres within Christchurch and transport effects.</p> <p>Where there is a need for supermarkets, the need for one to be located in areas they are not provided for should be assessed through a resource consent application. Such an application should require consideration of all the potential effects and the range of objectives and policies in the District Plan that are relevant, as well as those in higher order documents.</p>	Retain the existing proposed District Plan provision for supermarkets.

DPR-0374	Rolleston Industrial Holdings Limited (RIHL)	470 - 503	Non-notification clauses	<p>Insert the following words, or words to the like effect, to all controlled and restricted discretionary activity rules:</p> <p><u>Applications shall not be limited or publicly notified, on the basis of effects associated specifically with this rule and the associated matters of control or discretion.</u></p>	Oppose in part	Applications should be limited or publicly notified if neighbouring properties, communities, or the wider district are potentially directly affected and the adverse effects are potentially more than minor or where the Act requires notification.	Do not limit notification where neighbouring properties, communities, or the wider district are potentially directly affected and the adverse effects are potentially more than minor or where the Act requires notification.
DPR-0376	Fox & Associates	002	SD-UFD-O2	<p>Amend Strategic Directions SD-UFD-O2 to read:</p> <p>There is <del>sufficient</del> <u>as a minimum, ample</u> feasible development capacity to meet anticipated demands for housing and business activities.</p>	Oppose in part	It is appropriate to provide, as a minimum, sufficient development capacity for anticipated future demand, but that should include some buffer to provide for the possibility that future demand exceeds that predicted. However, providing for excessive development capacity can result in inefficiencies, poor integration with infrastructure provision, and not achieving a well - functioning urban environment. The NPS -UD already requires a buffer to	Amend the objective as follows; "There is <u>at least</u> sufficient feasible development capacity ..."



						be included in the calculation of the required development capacity, and seeks provision of “at least sufficient development capacity” (Policy 2). Wording along those lines would be more appropriate.	
DPR-0384	Rolleston Industrial Developments Limited (RIDL)	503 - 536	Rezoning	<p>Insert the following words, or words to the like effect, to all controlled and restricted discretionary activity rules:</p> <p><u>Applications shall not be limited or publicly notified, on the basis of effects associated specifically with this rule and the associated matters of control or discretion.</u></p>	Oppose in part	Applications should be limited or publicly notified if neighbouring properties, communities, or the wider district are potentially directly affected and the adverse effects are potentially more than minor or where the Act requires notification.	Do not limit notification where neighbouring properties, communities, or the wider district are potentially directly affected and the adverse effects are potentially more than minor or where the Act requires notification.
DPR-0414	Kāinga Ora - Homes & Communities	454	New (UG-P13)	<p>Amend policy as follows and move to Strategic Directions:</p> <p>Any new residential growth area within the Greater Christchurch area shall only occur where:</p> <p>1. <del>Extensions assist in</del></p>	Oppose	Increased densities would better achieve efficiencies in coordination of land use and infrastructure, support mixed land use, support multi-modal transport systems and protect the productive rural land resource.	Retain the existing provisions in the proposed District Plan, except to the extent that an

				<p>meeting the housing bottom lines (minimum housing targets) of 8,600 households over the medium term period through to 2028.</p> <p>2. ... ;</p> <p>3. The land is <u>within the Future Urban Zone</u> subject to an Urban Growth Overlay and the area is either:</p> <p>...</p> <p>4. The minimum net densities of 12hh/ha for residential activities or 1 to 2hh/ha for rural residential activities are met;</p> <p>...</p>		<p>The existing provisions in the proposed District Plan better give effect to the urban development strategy for Greater Christchurch, Our Space, and the Canterbury Regional Policy Statement.</p> <p>Minimum housing targets will ensure sufficient development capacity is provided in accordance with the NPS-Urban Development.</p>	<p>increase in the minimum net densities has been sought in the City Council submissions.</p>
DPR-0414	Kāinga Ora - Homes & Communities	455	New (UG-P14)	<p>Amend policy as follows and move to Strategic Directions:</p> <p>Any new residential growth area outside the Greater Christchurch area shall only occur where:</p> <p>1. ... ;</p> <p>2. The land is <u>within the Future Urban Zone</u> subject to an Urban Growth Overlay, or the township-based opportunities and constraints identified in any relevant Development Plan are addressed;and</p> <p>3. The minimum net densities support a range of housing types that respond to demographic change, social</p>	Oppose	<p>Increased densities would better achieve efficiencies in coordination of land use and infrastructure, support mixed land use, support multi-modal transport systems and protect the productive rural land resource. It is also important and appropriate that the District Plan include direction that minimum densities be set to enable a range of housing types to meet people's needs. This is consistent with the NPS-Urban Development.</p>	<p>Retain the existing provisions in the proposed District Plan.</p>

				needs and outcomes identified in any relevant Development Plan; and 4. ...			
DPR-0422	Federated Farmers of New Zealand - North Canterbury	098	SD-DI-O2	<p>Delete as notified and replace with:</p> <p><u>People and communities in Selwyn District are enabled to provide for their economic, social, and cultural well-being through:</u></p> <p><u>a) Ensuring consolidated residential development;</u></p> <p><u>b) Integrated management between the development of land and the provision of infrastructure;</u></p> <p><u>c) Avoiding reverse-sensitivity effects between established and new activities; and</u></p> <p><u>d) Enabling change in land use to meet demand for new residential or business development and changing markets for primary produce.</u></p>	Oppose in part.	<p>The proposed sub-clause d) can be interpreted to allow any change of land use on any land to provide for residential, business or primary production activity needs. Considering the primacy of this objective, this could result in inappropriate outcomes, including poorly functioning urban environments. It could also lead to outcomes that do not give effect to the Canterbury Regional Policy Statement or the NPS-Urban Development (Objective 1).</p> <p>It would be more appropriate that the objective be to provide for the changing needs of such activities. Where and how those needs are provided for are covered in other objectives and policies in the Plan.</p>	<p>Sub-clause d) be amended to be;</p> <p>d) Providing for the needs of residential, business and primary production activities.</p>
DPR-0422	Federated Farmers of New Zealand - North Canterbury	105	SD-UFD-01	<p>Amend as follows:</p> <p>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,</p>	Support in part.	<p>The need to protect highly productive land is supported. However, the existing term "responding" is more appropriate than the proposed change to "considering". "Responding" implies acting in respect of the matters</p>	<p>Amend as sought by the submitter, except for the change from "responding"</p>

				while <del>considering</del> <u>responding</u> to the community's needs, natural landforms, cultural values, and physical features, and the <u>potential loss of highly productive soils and the creation of incompatible activities.</u>		listed, rather than just considering those matters.	to "considering".
DPR-0438	Robert Parker	002	Rezoning	Insert an additional GRUZ-SCA area for Lot 4 DP 391803 and Lot 1 DP 540165 to allow for a minimum of 5,000m2 allotments as a controlled activity.	Oppose	The outcome sought in the submission would enable the land to be used for rural residential/lifestyle development. The site is identified as LUC Class 1 highly productive land. Such land is a scarce resource that is important both locally and nationally.  The proposed National Policy Statement for Highly Productive Land also contains a direction that rural lifestyle development be directed away from areas of highly productive land.	That this submission be rejected.
DPR-0439	Rayonier Matariki Forests	018	EIB-P4	Amend as follows:  Avoid the clearance of indigenous vegetation, and any earthworks or <del>plantation forestry</del> within scheduled Significant Natural Areas, and <del>these other areas that meet the criteria set out in EIB-SCHED1, where the activity would adversely affect indigenous biodiversity values.</del>	Oppose	EIB SCHED1 acts as a placeholder for providing a representative point at which listed indigenous species are likely to be ecologically significant, in the absence of district wide ecological assessment being undertaken. It is important to ensure indigenous vegetation that is likely to be significant is not cleared or is appropriately managed. Its removal from Policy EIB-P4 would potentially	Retain the Policy as contained in the proposed District Plan.

				Refer to original submission for full decision requested.		result in indigenous vegetation with significant values being cleared, leading to the loss of significant ecological values. This is consistent with the approach included in the Christchurch District Plan and will ensure protection of indigenous species across territorial boundaries.	
DPR-0488	Dally Family Trust and Julia McIlraith	005	SD-UFD-O2	Amend as follows:  There is <u>at least</u> sufficient feasible development capacity to meet anticipated demands for housing and business activities.	Support	It is appropriate to provide, as a minimum, sufficient development capacity for anticipated future demand, but that should include some buffer to provide for the possibility that future demand exceeds that predicted. The NPS -UD already requires a buffer to be included in the calculation of the required development capacity and seeks provision of "at least sufficient development capacity" (Policy 2). Wording along those lines would be more appropriate.	Amend the objective as follows; "There is <u>at least</u> sufficient feasible development capacity ..."
DPR-0491	Paul and Sue Robinson	003	SD-UFD-O2	Amend as follows:  There is <del>sufficient as a minimum</del> , <u>ample</u> feasible development capacity to meet anticipated demands for housing and business activities.	Oppose in part	It is appropriate to provide, as a minimum, sufficient development capacity for anticipated future demand, but that should include some buffer to provide for the possibility that future demand exceeds that predicted. However, providing for excessive development capacity can result in inefficiencies,	Amend the objective as follows; "There is <u>at least</u> sufficient feasible development capacity ..."

						<p>poor integration with infrastructure provision, and not achieving a well - functioning urban environment. The NPS -UD already requires a buffer to be included in the calculation of the required development capacity, and seeks provision of "at least sufficient development capacity" (Policy 2). Wording along those lines would be more appropriate.</p>	
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