

12 October 2021

Selwyn District Council
Freepost 104 653,
PO Box 90
ROLLESTON 7643

Email: submissions@selwyn.govt.nz

Christchurch City Council submission on the Private Plan Change 68 Request to rezone 67 hectares of current rural land in Prebbleton to residential land

Introduction

1. Christchurch City Council (the Council) thanks Selwyn District Council for the opportunity to provide comment on the Application for Private Plan Change 68. The request seeks to rezone approximately 67 hectares of land, which would result in the ability to provide for up to 820 residential allotments.

Summary

2. Our Submission addresses:
 - a. The NPS UD requirement for significant development capacity and a well-functioning urban environment.
 - b. Relationship with the Canterbury Regional Policy Statement (CRPS)
 - c. The potential wider transport effects on Christchurch City; and
 - d. Residential density.
 - e. Social and Affordable Housing
3. Christchurch City Council (thereafter referred to as “Council”) is supportive of growth in the towns in Selwyn District to support the local needs. Council has and continues to be supportive of the work that Selwyn District Council has undertaken in conjunction with the other Greater Christchurch Partners on urban form and anticipated density for development opportunities to provide for a compact and sustainable urban form. However the area sought by Plan Change 68 for rezoning is outside of the areas identified for development in the CRPS and *Our Space 2018-2038: Greater Christchurch Settlement Pattern Update - Whakahāngai O Te Hōrapa Nohoanga (Our Space)*. *Our Space 2018-2038: Greater Christchurch Settlement Pattern Update - Whakahāngai O Te Hōrapa Nohoanga (Our Space)*. The CRPS seeks that urban development is avoided in this area. In our view re-zoning of the outside the areas identified for development in the CRPS must be refused, as it does not give effect to the CRPS. **Council seeks that the plan change is refused.**

National Policy Statement on Urban Development 2020 (NPS UD)

4. The direction in the National Policy Statement on Urban Development (NPS-UD) is for good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport and to support reductions in greenhouse gas emissions.

5. Policy 8 of the NPS UD provides for:
Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is:
 - (a) *unanticipated by RMA (Resource Management Act 1991) planning documents; or*
 - (b) *out-of-sequence with planned land release.*

6. The proposal is not anticipated by RMA planning documents as the site is located outside the greenfield priority areas identified on Map A of the Canterbury Regional Policy Statement (CRPS) and has not been included as a future development area in Change 1 to the CRPS.

7. Policy 8 of the NPS UD sets out two tests for unanticipated or out-of-sequence development. These tests are that:
 - a. The plan change will provide significant development capacity; and
 - b. The plan change will contribute to a well-functioning urban environment.
 Based on the wording of Policy 8 which includes the word 'and', the direction outlined above needs to achieve both tests.

8. The scale for determining the significance of the development capacity provided is an important consideration. The Council considers that the assumption that 820 houses within the Greater Christchurch Partnership sub-region constitutes significant development capacity needs to be further supported by evidence, which has not been included with the plan change material as the plan change focuses on Prebbleton and the Selwyn District only. The capacity needs to be considered in the context of the Greater Christchurch 79,628 dwelling long term housing target that is required under the NPS UD to meet demand. 820 houses is only a small fraction (approximately 1%) of that housing target.

9. Development beyond the greenfield priority areas and the future development areas in Map A exceeds the amount of housing and business capacity required to meet medium and long term targets, identified in *Our Space 2018–2048 Greater Christchurch Settlement Pattern Update Whakahāngai O Te Hōrapa Nohoanga* and expressed in the CRPS. Thus additional capacity is in excess of what is needed. Development in these areas is not meeting a capacity shortfall, but rather could delay other growth and urban regeneration areas identified in *Our Space* (and where infrastructure, and the public transport system, has been already built to served) from being developed and regenerated.

10. A more constructive approach would be to use the guidance material provided by the Ministry of the Environment and the direction outlined in the CRPS to interpret significance. While the term 'well-functioning urban environment' is new to the NPS UD, the overall direction in the RMA outlining how the Greater Christchurch sub-region should grow has been implemented through Chapter 6 of the CRPS. This direction includes where development is best located within the Greater Christchurch sub-region and the density which development should achieve. While it is important to assess the plan change as unanticipated, the rationale for why development was directed to particular areas in the CRPS is relevant for determining the appropriateness of the proposal.

Relationship with the Canterbury Regional Policy Statement

11. As mentioned before urban development proposed by Plan Change 68 is not anticipated by the CRPS. In fact the CRPS seeks that urban development is avoided in this area:

Objective 6.2.1: Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that:3. avoids urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS;

12. Under the RMA, district plans are required to give effect to any national policy statement and regional policy statement. If a proposed change to a district plan will, if accepted, fail to give effect to a regional policy statement, then a change should be sought to the RPS either in advance or at the same time.
13. Based on our review of the Plan Change 68 documentation, we understand that there has not been an accompanying change sought or proposed to the CRPS that would rectify any inconsistency or conflict with Objective 6.2.1 of the CRPS. Thus Plan Change 68 does not give effect to the CRPS and in our view must be declined.

Wider transport effects on Christchurch City

14. Action 9b of *Our Space 2018-2048 (Greater Christchurch Settlement Pattern Update - Whakahāngai O Te Hōrapa Nohoanga)* states that:

Selwyn and Waimakariri District Councils are required “to undertake structure planning (**including the consideration of development infrastructure and the downstream effects on the Greater Christchurch transport network**) and review of District Plans over the next year for the identified Future Development Areas in the 2019 Canterbury Regional Policy Statement (CRPS) Change set out in Action 9a” (*Our Space*, Page 41 – emphasis added).

15. The vast majority (67%) of commute for work trips from Prebbleton are to Christchurch. However the plan change is for residential development beyond the infrastructure boundary in the CRPS and thus this has not been anticipated, nor the wider road network designed to accommodate it. Thus assessment of effects on the wider road network should be considered.
16. The Integrated Transportation Assessment (ITA) analyses accessibility between different modes of transport. The conclusion is that there are similar travel times between Prebbleton and the popular commuter destinations using different modes of transport, in particular express buses, and private motor vehicles. However the analysis does not include the walking time to the nearest bus stop. Page 17 of the ITA states the nearest bus stop to the site is approximately 1km from the nearest edge of the site. The rest of the plan change site is between 1km and 2.5km from the nearest bus stop. A 1-2.5km walking distance will add 10-30 mins to the travel time. This will significantly increase the travel time for public transport and discourage public transport usage and thus promote the reliance on car based transport. The ITA also states the established bus routes are considered unlikely to change in future. At the time of writing it is understood that there are no proposed bus route changes proposed in Prebbleton (Pg 27 of the ITA). Council is unclear how providing urban development in an area with limited public transport this will achieve a reduction in greenhouse gas emissions, which is a requirement in the definition for a well-functioning urban environment in the NPS-UD.

17. An increase in commuter traffic into Christchurch City, means more people making more trips. The result will be increased emissions, congestion and longer journey times.
18. Reducing private motor vehicle dependency is important for improving sustainability by reducing emissions and the significant adverse effects of downstream traffic within Christchurch City.

Density

19. Page 22 of the Private Plan Change request states that “an outline development area plan has been prepared in accordance with the specified minimum density of 12 household per hectare”. The Council seeks a higher minimum density requirement of 15 households per hectare. Increased densities would better achieve efficiencies in coordination of land use and infrastructure, support mixed land use activities, support multi-modal transport systems and protect the productive rural land resource. Action 3 of *Our Space 2018-2048 (Greater Christchurch Settlement Pattern Update - Whakahāngai O Te Hōrapa Nohoanga)* was to undertake an evaluation of the appropriateness of existing minimum densities. In response to this the Greater Christchurch Partnership has commissioned a technical report on density to achieve the agreed actions in Our Space. This report has concluded that 15 households per hectare is the ideal minimum level of density in the Greater Christchurch area. Council seeks that a minimum density requirement of 15 households/hectare, and the recommendations of the report, are included in the plan change.

Social and Affordable Housing

20. The Greater Christchurch Partnership are working together on developing a Social and Affordable Housing Action Plan. The Council request that the relevant recommendations of the Social and Affordable Housing Action Plan be incorporated in the Plan Change.

Relief Sought

21. That the plan change is refused.

Thank you for the opportunity to provide this submission.

No Council cannot gain an advantage in trade competition through this submission;

Yes Council would like to be heard with regards to this submission (we may revise this position once all submissions and further submissions have been reviewed);

Yes Council would consider presenting a joint case with any submitters who raised similar points.

For any clarification on points within this submission please contact David Falconer, Team Leader City Planning, at david.falconer@ccc.govt.nz

Yours faithfully



Jane Davis
General Manager - Infrastructure, Planning and Regulatory Services