Submission on Greater Christchurch Settlement Update – Our Space 2018-2048

Ivan Robertson, Lindsay & Judith Blackmore & Malcolm Main

November 2018

Greater Christchurch Partnership

Submitter Details

Name: Ivan Robertson, Lindsay & Judith Blackmore & Malcolm Main

Postal address: C/- Aston Consultants Ltd
Resource Management and Planning
PO Box 1435
Christchurch 8140

Email address: fiona@astonconsultants.co.nz

Phone Number: 03 3322618

Mobile Number: 0275 332213

Contact Person Fiona Aston

Hearings:

We wish to speak at the hearings.

Preferred location: Selwyn District

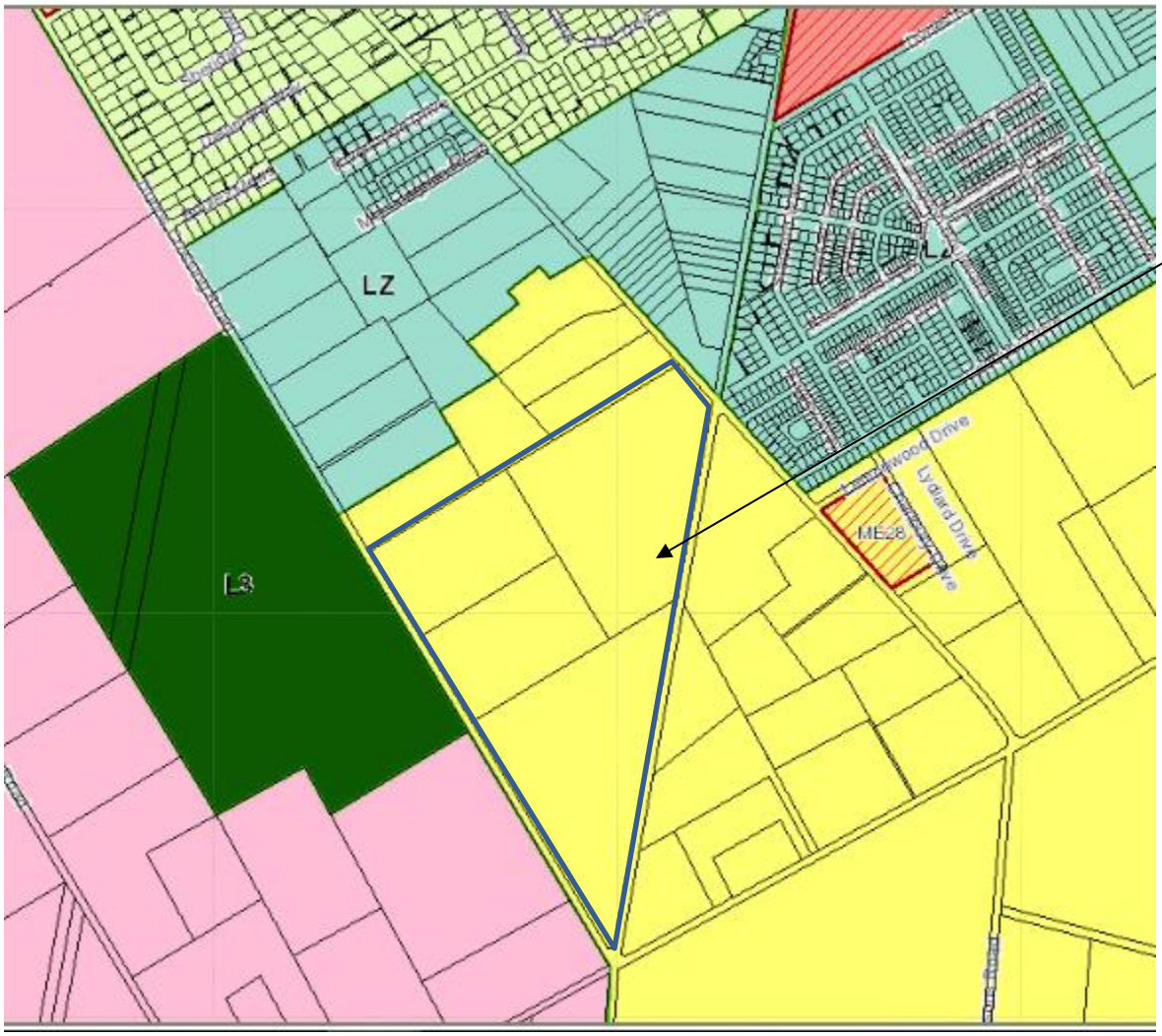
Contact number: C/- Aston Consultants Ltd. Contact details as above.

Background and Site

The submitters Ivan Robertson, Lindsay and Judith Blackmore and Malcolm Main ('the Submitters') own a total of 61.336 ha ('the Site') comprising the following:-

Robertson:	
Lot 1 DP 61278 Blk 123 Leeston SD	10.115 ha
Lot 3 DP 57004	20.731 ha
Blackmores:	
Lot 2 DP 61278 BLK III Leeston SD	10.1150 ha
Main:	
Lot 1 D P 57004 BLK III Leeston SD	20.375 ha.

The land is located at south west Rolleston, west of the existing Faringdon development and south of the Outline Development Plan Area 12 (56ha zoned Living Z and bound by East Maddisons Road to the east and Dunns Crossings Road the west) – see location plan below and quick map in **Appendix A**. It is currently used for grazing purposes and hay cropping and balage. There is an existing dwelling and associated dwelling on each block, except Lot 3 DP 57004 which is vacant.



The Site is located within the Canterbury Regional Policy Statement (CRPS) Projected Long Term Infrastructure Boundary for Rolleston shown on Map A, and is shown on **Our Space** Fig 16 as Future Development Area. It is identified as residential land on the Rolleston Structure Plan as shown below.

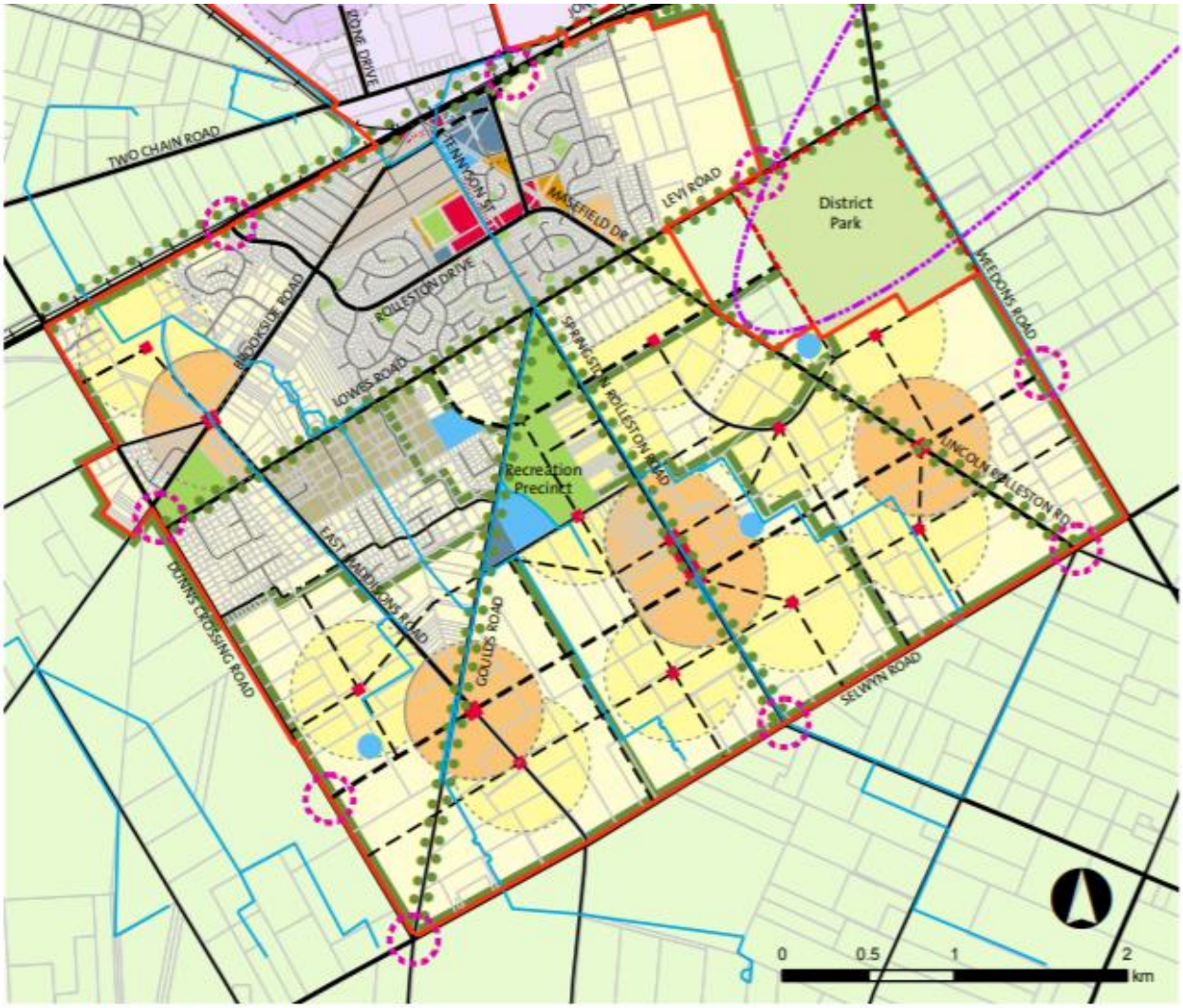


Figure 5.2: Rolleston Structure Plan

- Study Area
- Railway
- National Arterial
- Main (primary) roads
- Proposed main (primary) roads
- Local (secondary) roads
- Proposed local (secondary) roads
- Local (minor) roads
- Walking and Cycling Link
- Town Centre
- Neighbourhood Centre
- Local Centre
- Comprehensive Housing
- Medium Density Residential (20HH/Ha)
- Medium Density Residential (15HH/Ha)
- Low Density Residential (10HH/Ha)
- Low Density Residential (7HH/Ha)
- Community Facilities
- Education Facilities
- Green Corridors and Green Belt
- District Park
- Recreation Precinct and Reserves
- Rural land
- Avenue Planting
- Izone Southern Business Hub
- Water Races
- Noise Contour
- 5 Minute Walk (400m)
- Key Gateways

Future Development Area – Rolleston

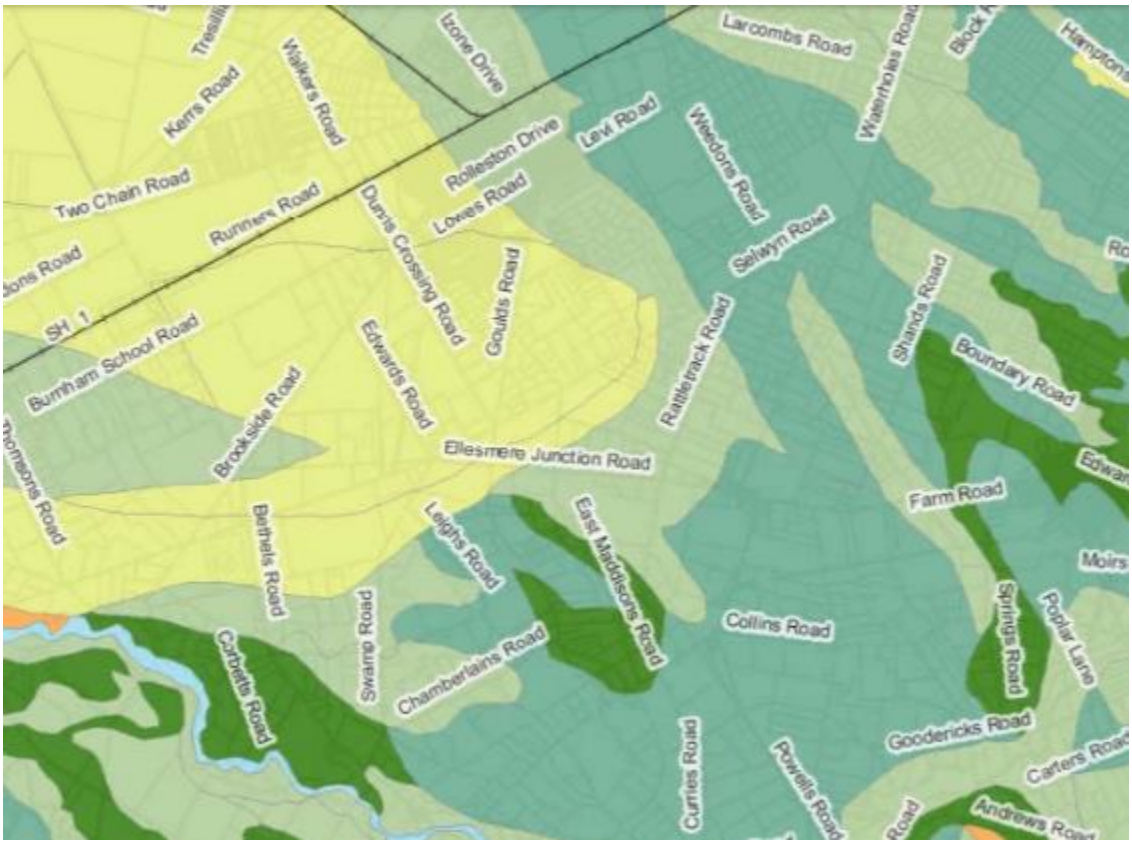
The Submitters support identification of their land for residential purposes in the above documents, but consider that it should be identified as Priority Greenfield Residential now, and rezoned Living Z to enable residential development to proceed. The Submitters singularly and combined have the larger remaining land parcels in this part of Rolleston, and have the same timeframes and intentions

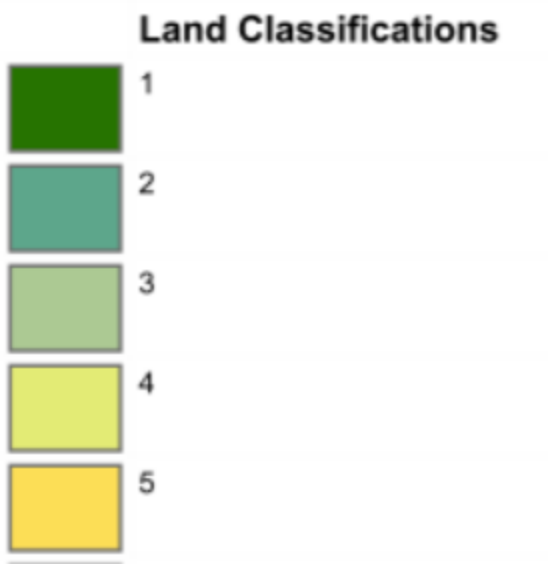
for release of their land for urban development i.e. now. This will facilitate the land's ready development to urban densities as they can be developed as one sizeable block with flexibility regarding location of roading, services etc.

Suitability of Land for Development

The Site is adjoining and can be readily serviced from existing neighouring Living Z and Housing Accord areas at south Rolleston. There are no natural hazard issues which would preclude rezoning. The Site is not subject to liquefaction or other natural hazard risks such as flooding or ponding. The light gravel soils are suitable for urban development.

The soils are Class 4 in terms of the versatility index as shown on the map below (Selwyn Rural Residential Strategy Appendix 2 Study Area Map 25 Soil Versatility):-





i.e. urban development will not take land which has high potential for agricultural production.

Housing Development Capacity Assessments

Our Space acknowledges that its housing capacity work is uncertain, in particular assessment of the commercial feasibility of development, and that work is required to improve the modelling tools used. It recognizes that given the range of reported feasibility, capacity may not be sufficient to meet demand over the medium term in Waimakariri and Selwyn. Notwithstanding no provision is made for further capacity in the medium term anywhere in Selwyn, and only at Rolleston in the long term. **Our Space** also recognizes that a responsive planning approach is required given the many uncertainties associated with the primary drivers and influencers of urban development in Greater Christchurch.

The consequences of an 'undersupply' of housing are more significant than the consequences of oversupply i.e. land scarcity which generally leads to higher land prices and greater incentive to land bank and achieve 'easier' return on capital (at no risk) by capitalizing on increasing land values rather than by undertaking development.

Relief Sought:

Additions are shown in bold and underlined and deletions as strike through.

1. Amend Fig 16: Proposed locations of future development areas in Greater Christchurch by as follows:-

- Change status of Rolleston Future Development Areas to Greenfield Priority Areas – Residential, including the Submitters' land.

2. 6.2 Schedule of future work

Amend 8 (page 34) as follows:-

Prepare a proposed change to Chapter 6 (Recovery and Rebuilding of Greater Christchurch) of the Canterbury Regional Policy Statement to:-

- address any need for additional housing development capacity over the short and medium term including at Rolleston including by amending Map A to be consistent with the other relief sought in this submission (including 1. above and 3. below); and

- provide flexibility to accommodate meritous proposals for urban development and zoning and to facilitate a responsive planning approach by amending and adding to the objectives and policies as follows (insertions in bold and underlined):-

Add new Policy 6.3.1A as below:-

Policy 6.3.1 A

(a) Enable urban development or zoning outside the Greenfield Priority, Special Housing Areas and Existing Urban Areas shown on Map A provided the following conditions are met:-

(i) Any additional land is contiguous with a Greenfield Priority Area, Special Housing area, or Existing Urban Area; and

(ii) Any additional land will integrate with the provision of infrastructure; and

(iii) Any additional land is a logical addition to the urban area and will contribute to a consolidated urban form; and

(iv) The beneficial planning outcomes for the urban development or extension outweigh any disbenefits arising from increasing the land available for urban development; and

(v) All of the criteria in Policy 6.3.11 (5)(a) to (g) inclusive are met.

Explanation:

This policy confirms the requirement for urban development to be contained within Greenfield Priority, Special Housing and Existing Urban Areas but provides some flexibility to accommodate meritous proposals and to facilitate a responsive planning approach given the uncertainties associated with the housing and business land

capacity assessments which have informed Map A, and the primary drivers and influencers of urban development in Greater Christchurch.

6.2.1 Recovery framework

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 **or which has only minor or less than minor adverse effects that will not compromise the overall CRPS urban growth management approach**;

6.3.1 Development within the Greater Christchurch area

In relation to recovery and rebuilding for Greater Christchurch:

4. ensure new urban activities only occur within existing urban areas or identified greenfield priority areas as shown on Map A, unless they are otherwise expressly provided for in the CRPS **or which has minor or less than minor adverse effects that will not compromise the overall CRPS urban growth management approach**;

6.3.7 Residential location, yield and intensification

In relation to residential development opportunities in Greater Christchurch:

7. Subject to Policy 5.3.4, residential greenfield priority area development shall occur **generally** in accordance with Map A. These areas are sufficient for both growth and residential relocation through to 2028.

3. Specify in **Our Space** that Fig 16 be included in District Plans rather than the Canterbury Regional Policy, thus facilitating the ability for private plan requests for changes to the same, with appropriate criteria for assessment being included in the CRPS and/or District Plans; or as a less preferred alternative, other methods to retain flexibility and 'future proofing' to respond to meritous housing and business development proposals which give effect to the NPS-UDC but are not recognized or provided for in **Our Space** and supporting documents.

4. Consider streamlined RMA or other streamlined processes to facilitate the amendments sought which are specific to the Submitters' land and potentially other meritous minor rural/urban boundary changes, and associated policy wording. Do not use streamlined

processes for implementation of the overall **Our Space** strategy and approach which has very significant implications and needs to be subject to rigorous RMA based evidential testing.

5. Such other consequential, additional or other amendments to Chapter 6 of the RPS and other documents, and any other actions, to be consistent with and give effect to the intent of this submission, including directing consequential amendment to the Selwyn District Plan to zone the Submitters' land Living Z.

Reasons for Relief Sought:-

1. For the reasons set out above under and under the responses to the Submission Form questions below.
2. The housing and business development capacity targets, urban form outcomes, and Schedule of Future Work measures (including change to the CRPS) contained in **Our Space** will have a profound and defining effect on the Greater Christchurch settlement pattern for the next 30 years. There will be very significant flow on effects for the local, regional and potentially national economies. There is no s32 assessment accompanying **Our Space** despite its defining role in 'dictating' the urban growth approach for Greater Christchurch for the next 30 years.
3. The amendments sought will enable the owners of the Site to use the Site in the most appropriate, effective and efficient way which will achieve the purpose of the Resource Management Act 1991 (the Act).
4. **Our Space** as notified proposes an urban growth management approach, in particular as it affects the Site, which is inconsistent with and does not give effect to the Act, including Part 2 and Section 32, and other relevant statutory and non statutory matters.
5. The **Our Space** development capacity targets are uncertain and likely to be inaccurate and are based on a flawed methodology.
6. **Our Space** considers a responsive planning approach is necessary to future urban growth management for Greater Christchurch but does not enable or facilitate this whereas the relief sought in this submission will.
7. **Our Space** as notified is contrary to and does not give effect to the National Policy Statement – Urban Development Capacity (NPS – UDC) in particular Policy PB1 which requires housing capacity supply to meet demand for different types, locations and price points.

8. A fixed uncontestable urban/rural boundary line for Greater Christchurch as proposed by Our Space is unlikely to facilitate the urban form sought by **Our Space** including for the following reasons:-

- Overly strict limitations on peripheral growth causes excessive land price inflation that in turn has a very negative effect on housing affordability;
- A planning regulatory regime which provides for a contestable urban/rural boundary sends an important signal to the property market that it is best to get on with development rather than "land bank" (because there is excessive capital gain due to scarcity of land supply);
- Containment and higher land values does not facilitate intensification;
- If the Central City and the Key Activity Centres are attractive the market will locate there by people's choice. Generally carrots are better than sticks to achieve desired planning outcomes.
- A contestable urban/rural boundary is not 'laissez-faire' and ad hoc and will not result in uncontained urban sprawl. The proposed amendments to Our Space and other planning documents require strategic planning including with respect to infrastructure, and an evidence base in support of any amendments to the boundary;
- A policy of both "up and out" that ensures there are a range of development opportunities and housing choices is appropriate.

Housing Growth:

Question 1:

Our Space highlights there is significant capacity for new housing through redevelopment in Christchurch City but to accommodate housing growth in Selwyn and Waimakariri it identifies additional greenfield land around Rolleston, Rangiora and Kaiapoi.

Do you agree with this approach and why?

Response:

The Future Development Area shown on Fig 16, in particular the Submitters' land, should be identified as Greenfield Priority Area and zoned Living Z now. See above for further background and reasons.

Question 2:

Our Space adopts the current planning framework that encourages a range of new housing types, especially in the central city, close to suburban centres within the City and around existing towns in Selwyn and Waimakariri.
Do you agree with this approach and why?

Response:
No comment.

Question 3:
Our Space proposes to develop an action plan to increase the supply of social and affordable housing across Greater Christchurch and investigate with housing providers the different models to make it easier for people to buy their own home.
What elements should be included in this action plan?

Response:
No comment.

Business Growth
Question 4:
Our Space adopts the current planning framework that directs new commercial development (office and retail) to existing centres to retain their flexibility and vitality, especially the central city, suburban centres and town centres in Selwyn and Waimakariri.
Do you agree with this approach and why? What further measures would support such development?

Response:
No comment.

Question 5:
The Canterbury Regional Policy Statement and the District Plans for Christchurch City and Selwyn and Waimakariri Districts have already identified suitable capacity for new industrial businesses.
Do you agree or disagree this is sufficient and in the right location and why?

Response:

No comment.

Growth needs

Question 6:

The proposals in **Our Space** are informed by a Capacity Assessment that considers future demands for housing and business land, based on demographic changes and projections from Statistics New Zealand, and likely changes in our economy, including through business sector trends and impacts from technological change.

Do you agree or disagree with this evidence base and why?

Response:

See comments above re Capacity Assessment.

Transport and other infrastructure

Question 7:

Our Space promotes greater densities around key centres to increase accessibility to employment and services by walking, cycling and public transport. This aligns with recent transport proposals that signal more high frequency bus routes and in intention to deliver rapid transit along the northern and south-west transport corridors.

Do you agree or disagree with this approach and why?

Response:

No comment, other than it is noted that Rolleston will be connected by rapid transit under the **Our Space** proposals. However, no business case has been established for these proposals to date and they are highly uncertain. Further GF development at Rolleston should not be contingent on such facilities being in place first. The 4 laning of SH1 and the Southern Motorway extension will increase the ready accessibility to Christchurch City. Rolleston also has a significant and growing local employment area at Izone and the inland port.

Question 8:

Our Space aligns with broader infrastructure planning (including wastewater, water supply, stormwater, energy, telecommunications, community facilities, schools and healthcare) to help create sustainable, cohesive and connected communities.

Do you agree or disagree with this approach and why? What more could be done to integrate infrastructure planning?

Response:

No comment, other than it is noted that there are no infrastructure constraints affecting the development proposal.

Other

What other points do you wish to make to inform the final **Our Space 2018-2048 Greater Christchurch Settlement Update?**

Response:

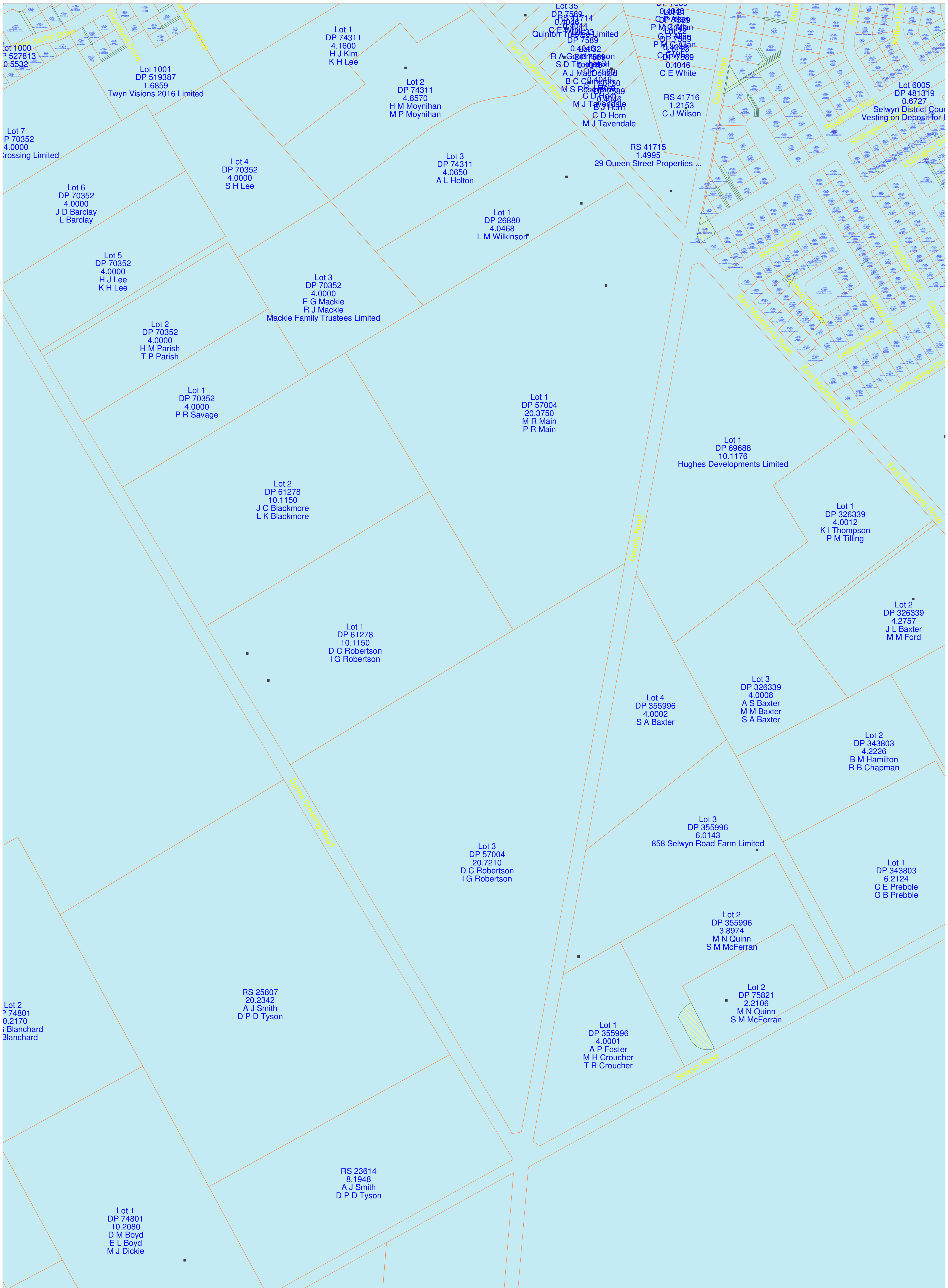
No further comments other than as noted above.

Appendices

Appendix A: Quick Map showing Submitters' Land

Appendix A

Quick Map showing Submitters' Land



QuickMap
Custom Software Ltd

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Any person wishing to rely on the information shown on this map must independently verify the information

Scale 1:5000 Topographical and Cadastral map derived from LINZ data. Printed: 27/11/2018 14:35.