

APPENDIX 1: Application for request to use a Streamlined Planning Process

This form should be used by a local authority intending to prepare, change, or vary a policy statement or plan, when applying to the responsible Minister(s) to use the Streamlined Planning Process (**SPP**).

We recommend you discuss the information requirements with the Ministry for the Environment (the **Ministry**) before the request is lodged. Our contact details are at the end of this form. The Ministry has prepared technical guidance to assist local authorities prepare requests to use the SPP. See <http://www.mfe.govt.nz/publications/rma/technical-guide-streamlined-planning-process-under-resource-management-act-1991>.

If the required information is provided in an attached document, please include the page number(s) where this information is found in the attachment (e.g. Volume 1, pages 1 to 3).

All legislative references relate to the Resource Management Act 1991 (**RMA**), unless stated otherwise.

Part I: Request to the responsible Minister to use the Streamlined Planning Process

To the responsible Minister,

Applicant's details

Full name of the local authority making request (the applicant): Canterbury Regional Council (Environment Canterbury)

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This application is for a direction to use the Streamlined Planning Process for:

A proposed Change to Chapter 6 of the Canterbury Regional Policy Statement (**CRPS**) – Recovery and rebuilding of Greater Christchurch (**Proposed Change**).

Please provide a description of the planning issue for which the identified instrument is required:

The Proposed Change is a targeted change to Chapter 6 of the CRPS to implement the urban growth strategy set out in Our Space 2018-2048: Greater Christchurch Settlement Pattern Update Whakahāngai O Te Hōrapa Nohoanga (**Our Space**) and give effect to the National Policy Statement on Urban Development Capacity 2016 (**NPS-UDC**).

The Greater Christchurch Partnership (comprising the Canterbury Regional Council, Christchurch City Council, Selwyn District Council, Waimakariri District Council, Canterbury District Health Board, Te Rūnanga o Ngāi Tahu, New Zealand Transport Agency, Regenerate Christchurch and the Department of the Prime Minister and Cabinet) has worked collaboratively to review the settlement pattern for Greater Christchurch and develop Our Space 2018-2048, being the Greater Christchurch Settlement Pattern Update, to satisfy the requirements of the NPS-UDC.

In 2019, the Christchurch City Council, Selwyn District Council, Waimakariri District Council and Environment Canterbury adopted Our Space as the joint future development strategy for Greater Christchurch. Our Space describes how future housing and business growth will be provided for in Greater Christchurch over the next 30 years to 2048, and how the councils' targets for sufficient, feasible development capacity for housing will be met.

The overall amount of feasible development capacity for housing in Greater Christchurch is sufficient to meet demand over the medium term (plus the additional capacity margins required by the NPS-UDC)¹. However, there is insufficient development capacity in certain locations within Greater Christchurch in the medium term and overall in relation to long term housing demand². A potential shortfall of 5,475 dwellings in Selwyn District and 7,675 dwellings in Waimakariri District over the long term has been projected³.

A copy of Our Space is attached as Appendix 1a. The Housing and Business Capacity Assessment 2018 Summary Report, which sets out information about projected demand and current development capacity for housing and business which informed Our Space, is attached as Appendix 1b.

Most of the growth expected to occur in Greater Christchurch can be accommodated within existing urban environments. However, to help address projected housing capacity shortfalls for the Selwyn and Waimakariri Districts over the medium to long term, the strategy set out in Our Space includes the identification of some new greenfield areas for housing (which are referred to as Future Development Areas) in Rolleston, Rangiora and Kaiapoi.

¹ Our Space 2018-2048: Greater Christchurch Settlement Pattern Update Whakahāngai O Te Hōrapa Nohoanga, Table 3, page 15, and Housing and Business Capacity Assessment for Greater Christchurch March 2018.

² At the territorial authority level, given the range of reported feasibility, capacity in the Selwyn and Waimakariri Districts may not be sufficient to meet demand over the medium term. The significant capacity in Christchurch City is expected to be sufficient over the next 30 years, even with a higher share of growth apportioned to the City over the long term period.

³ Our Space 2018-2048: Greater Christchurch Settlement Pattern Update Whakahāngai O Te Hōrapa Nohoanga, Table 3, page 15.

Our Space identifies the Future Development Areas as having the potential to provide for over 10,000 houses. Actual housing capacity numbers will be determined once structure planning processes being carried out by the Selwyn and Waimakariri District Councils are complete.

The Future Development Areas are located within the existing Projected Infrastructure Boundary, identified on Map A in Chapter 6 of the Canterbury Regional Policy Statement (**CRPS**). Further, the Future Development Areas are consistent with the long-term growth strategy set out in the Urban Development Strategy for Greater Christchurch. Appendix 2 sets out a summary of the processes and documents that have identified these areas for future growth since 2007.

Map A of Chapter 6 of the CRPS identifies the location and extent of urban development that will support earthquake recovery, rebuilding and planning for future growth and infrastructure delivery. This includes the identification of the Projected Infrastructure Boundary, the Existing Urban Area and Greenfield Priority Areas for Residential and Business. Map A is supported by policies that enable development within the Existing Urban Area and Greenfield Priority Areas and ensure that urban activities only occur within these areas, unless they are otherwise expressly provided for in the CRPS.

As the Future Development Areas sit outside the Existing Urban Area and Greenfield Priority Areas identified on Map A of the CRPS, the land cannot currently be used for urban activities. As a result, the existing policy framework of the CRPS provides an impediment to the rezoning of land within the Future Development Areas to respond to identified capacity shortfalls for housing.

Our Space identifies a need to progress a change to Chapter 6 of the CRPS at the earliest opportunity to enable the Selwyn and Waimakariri District Councils to identify and/or re-zone land within these areas, as part of those councils' district plan review processes, if required to meet medium-term housing needs. This is set out in the Schedule of Future Work in Section 6.2 of Our Space (see Appendix 1a for a copy of Our Space).

The Proposed Change seeks to make the following amendments to Chapter 6 and Map A of the operative CRPS:

- Amend Map A to identify Future Development Areas in Rolleston, Rangiora and Kaiapoi as shown in Figure 15 of Our Space.
- Insert a new policy (Policy 6.3.12), to enable land within these Future Development Areas to be re-zoned by the Selwyn and Waimakariri District Councils if required to meet their medium-term housing needs.
- Make consequential changes to objectives, policies, text and definitions within Chapter 6 of the CRPS.

A copy of the draft Proposed Change is attached as Appendix 3 to this application.

The outcomes of the Proposed Change are to:

- Implement the outcomes of Our Space, being the Future Development Strategy for Greater Christchurch.

- Give effect to the NPS-UDC by ensuring a minimum of 10 years zoned development capacity is enabled, and 30 years development capacity is identified, within Greater Christchurch.
- Provide flexibility for the Selwyn and Waimakariri District Councils to consider re-zoning additional land for housing as part of their district plan reviews (currently underway), where a sufficiency shortfall is identified through development capacity assessments.
- Enable urban development, specifically within the proposed Future Development Areas in Rolleston, Rangiora, and Kaiapoi.

The proposed planning instrument:

Does not relate to the coastal marine area

Part II: Eligibility criteria

Your application must meet at least one of the following criteria.

- (a) The proposed planning instrument will implement a national direction.
- (f) The expeditious preparation of a planning instrument is required in any circumstance comparable to, or relevant to, those set out in paragraphs (a) to (e).

Explain how specifically using the SPP the proposal meets the relevant criterion / criteria:

The proposed planning instrument will implement national direction in the NPS-UDC (section 80C(2)(a)). Specifically:

- The Proposed Change is necessary to ensure there is sufficient, feasible development capacity to support housing and business growth in Greater Christchurch over the medium and long term, in accordance with Policy PA1 of the NPS-UDC. As set out above, the assessment of development capacity carried out in 2018 indicated that while the overall amount of feasible development capacity for housing in Greater Christchurch is sufficient to meet demand over the medium term, there is insufficient capacity in certain locations within Greater Christchurch in the medium term and overall in relation to long term housing demand. A potential shortfall of 5,475 dwellings in Selwyn District and 7,675 dwellings in Waimakariri District, over the long term has been projected.
- The Proposed Change also implements Policy PC3, which requires that, when the evidence base or monitoring obtained in accordance with policies PB1 to PB7 indicates that development capacity is not sufficient in any of the short, medium or long term, local authorities shall respond by a) providing further development capacity; and b) enabling development in accordance with policies PA1, PC1 or PC2, and PC4. That response must be initiated within 12 months (Policy PC3). The Proposed Change will enable Selwyn and Waimakariri District Councils to respond, by re-zoning or identifying additional development capacity within the Future Development Areas, through district planning processes, if future

capacity assessments indicate that development capacity is not sufficient in the short to medium, or long term respectively.

The expeditious preparation of the Proposed Change is required to implement the NPS-UDC (section 80C(2)(f)). Specifically:

- Our Space identified the need to progress this targeted change to Chapter 6 of the CRPS, at the earliest opportunity, to enable the Waimakariri and Selwyn District Councils to consider identifying and/or re-zoning land within the Future Development Areas, including through their district plan review processes due to be notified in 2020. The expedient processing of this Plan Change through the Streamlined Planning Process is necessary to ensure that the Waimakariri and Selwyn District Councils can rezone areas within the Future Development Areas, as required, to meet shortfalls in capacity for housing as part of their upcoming district plan reviews. At present, the existing policy framework of the CRPS is an impediment to Waimakariri and Selwyn District Council rezoning any land outside of that already identified for development in the CRPS.
- We understand that the Selwyn District Council intends to notify its proposed district plan in early 2020, with the Waimakariri District Council intending to notify its proposed district plan in mid-2020. In order for those processes to proceed with sufficient certainty, the Proposed Change would need to be at least notified prior to notification of the proposed district plans, and operative before decisions are made on the proposed district plans. The time required to complete a standard Schedule 1 RMA process and resolve any appeals arising from that process would likely mean that the Proposed Change would not be progressed in time for the respective district plan reviews and the existing policy framework of the CRPS would remain an impediment to both the Selwyn and Waimakariri District Councils being able to respond to identified capacity shortfalls through their district plan review processes to implement the NPS-UDC.
- An expeditious completion of the Proposed Change is therefore necessary to ensure that the Waimakariri and Selwyn District Councils can rezone areas within the Future Development Areas, as required, to meet shortfalls in capacity for housing as part of their upcoming district plan reviews. Progressing the Proposed Change under a standard Schedule 1 RMA process will not achieve this outcome.

Part III: Why the SPP process is appropriate

Please explain why use of the SPP is appropriate as an alternative to using the standard process under Part 1 of Schedule 1 of the RMA. For example:

- (1) Why is the removal of appeals appropriate and justified in this circumstance?**
- (2) How is the proposed streamlined process proportionate to the scale and significance of the issues involved in the proposed planning instrument?**

Please explain how the application and proposed process relates to the purpose of the SPP set out in section 80B(1) of the RMA. Explain how this application will achieve an expeditious planning process, proportionate to the complexity and significance of the planning issues being proposed.

Complexity and significance of the planning issues being proposed

The Proposed Change provides the policy mechanism to implement the Future Development Strategy developed by the Greater Christchurch Partnership and adopted by the Greater Christchurch councils, following wide public engagement and a hearing process, conducted in accordance with the Local Government Act 2002. The Proposed Change involves a targeted amendment to Chapter 6 of the operative CRPS to implement a specific action identified in the Schedule of Future Work in Section 6.2 of Our Space (see Appendix 1a for a copy of Our Space) and to give effect to the NPS-UDC. In particular, the targeted change will enable Selwyn and Waimakariri District Councils to rezone areas within the Future Development Areas, as required to meet shortfalls in capacity for housing as part of their upcoming district plan reviews.

The Future Development Areas identified in the Proposed Change have been identified in Greater Christchurch long term growth strategies since 2007 and have been subject to extensive consultation (discussed further below). The areas identified are intended to meet medium to long term capacity needs in order to respond to the requirements of the NPS-UDC.

Wider and longer-term urban development issues will be considered as part of a scheduled full review of the CRPS in the next four years, during which participation through the standard Schedule 1 RMA process will be facilitated.

The planning process proposed in this application has been designed to include appropriate public participation proportionate to the narrow scope, complexity and significance of the Proposed Change. It also recognises the consultation that has previously been undertaken and future processes that will be progressed under standard Schedule 1 RMA processes. The development of Our Space involved wide public engagement and a hearing process, conducted in accordance with the Local Government Act 2002. A summary of this consultation is attached as Appendix 4.

The Future Development Areas are consistent with the long-term growth strategy of the Urban Development Strategy for Greater Christchurch, which underwent extensive public consultation, and were identified as locations for future growth through Proposed Change 1 to the CRPS which went through a Schedule 1 consultation process (see Appendix 2 for further detail in respect of the work that has been carried out to identify future growth since 2007 – ‘Identification of Future Development Areas 2007 - 2019’). There will be further opportunities for public participation when the Future Development Areas are subsequently identified or re-zoned through the structure planning and district plan review processes undertaken by the Selwyn and Waimakariri District Councils. It is anticipated that the district plan review processes will be subject to a standard Schedule 1 process with rights of appeal to the Environment Court. As set out above, wider and longer-term urban development issues, including the identification of any additional Future Development Areas will be considered as part of a scheduled full review of the CRPS in the next four

years. This is identified as an Action in Our Space and is also anticipated to comprise a standard Schedule 1 RMA process with rights of appeal to the Environment Court.

The process proposed appropriately provides opportunities for directly affected persons to participate in this targeted change relating to areas that have already been identified in previous processes and in circumstances where the consideration of rezoning of these areas will be subject to full public participation through the district plan reviews and the identification of additional future development areas and longer term growth issues through the full review of the CRPS.

Part IV: Description of the proposed process

Please provide details of the process you will use, and the timeframes proposed for the steps in that process. The proposed process must include the following minimum steps in red. If required, you may add additional steps before, in between, or after these mandatory steps:

	Procedural requirement (process step)	Description	Timeframes
1	Undertake further pre-notification engagement with Te Rūnanga o Ngāi Tahu (the iwi authority) in accordance with clause 4A of Schedule 1 of the RMA.	In accordance with Schedule 1 clause 4A.	To be completed no later than 15 working days after gazettal of the Direction.
2	Public notification of the Proposed Change for written submissions in accordance with clause 5 of Schedule 1 of the RMA (excluding clause 5(3) of Schedule 1). A minimum period of 20 working days for submissions must be specified in the public notice.	In accordance with the Schedule 1, Part 1, clause 5 process. We anticipate seeking a Council decision to notify the Proposed Change, following gazettal of the Direction.	To be completed no later than 20 working days after the completion of Step 1.
3	Provide an opportunity for written submissions under clause 6 ⁴ of Schedule 1 of the RMA (to the extent applicable under the Minister's direction).	A minimum period of 20 working days for submissions will be specified in the public notice.	Submissions to be received no later than 20 working days after public notification (Step 2).
4	Canterbury Regional Council to provide a written report showing how submissions have been considered and the changes (if any) recommended to the proposed planning instrument, including: a. the evaluation report under section 32 and 32AA; and	We anticipate seeking a delegation from Council for the Chief Executive to approve the report.	To be provided to the Minister for the Environment no later than 30 working days after the close of submissions (Step 3).

⁴ As amended in accordance with the Minister's direction.

	Procedural requirement (process step)	Description	Timeframes
	b. a report summarising how the persons making the recommendation have had regard to the evaluation report; and c. the reports and documents required by clause 83(1) for the Minister’s consideration.		
	Total time period within which the Streamlined Planning Process for the Proposed Change to Chapter 6 of the Canterbury Regional Policy Statement must be completed.		Steps 1-4 to be completed no later than 5 months after gazettal of the Direction.

Draft Statement of Expectations

The Minister for the Environment’s expectations for the Canterbury Regional Council are that in undertaking the Streamlined Planning Process as directed it will:

- a. Provide identified dates on its website to match the Direction once gazetted so members of the public can be informed about the actual anticipated timeframes of the Streamlined Planning Process.

Reporting Requirements

The Canterbury Regional Council shall provide a written report to the Minister within 10 working days of the completion of each of steps 1 and 3 above. The report shall demonstrate compliance with the step/s and timelines and identify any issues which may have a bearing on meeting the Minister’s Direction and Statement of Expectations.

Part V: Consultation and affected parties on the proposed planning instrument

Your application must include:

- **the persons you consider likely to be affected by the proposed planning instrument, and the reasons why**
- **a summary of any consultation done, or intended to be done, including consultation with iwi authorities, under clauses 1A to 3C of Schedule 1 Part 1 of the RMA**
- **demonstration that the local authority has complied with (or intends to comply with) clause 3(1) during the preparation of the proposed planning instrument.**

If consultation is intended to be done, it should be included in the proposed process, set out in part IV of this form.

Affected parties

Environment Canterbury has identified the following directly affected parties:

Te Rūnanga o Ngāi Tahu – the iwi authority for the rohe.

Selwyn and Waimakariri District Councils – the proposed Future Development Area in Rolleston falls within the jurisdiction of the Selwyn District Council; the proposed Future Development Areas in Rangiora and Kaiapoi fall within the jurisdiction of the Waimakariri District Council.

Landowners within the proposed Future Development Areas – the policy will enable the re-zoning of land within the proposed Future Development Areas in certain circumstances.

Whilst Environment Canterbury has identified the above parties as directly affected by the Proposed Change, public notification is proposed in the draft process set out for the Minister’s consideration in Part IV of this application. This is to ensure that all persons who may be affected have an opportunity to comment on the proposed policy wording and is in part to reflect the wider interest shown during consultation on Our Space (see below).

Summary of consultation with affected parties under clauses 1A to 3C of Schedule 1 Part 1 of the RMA

Consultation has been undertaken in accordance with Schedule 1, clauses 1A-3C of the RMA.

Pre-notification consultation on the draft Proposed Change to Chapter 6 was held from Monday 29 July, until Friday 16 August. This was a targeted consultation, under Schedule 1 clause 3 of the RMA.

Emails were sent directly to:

- The Minister for the Environment and other Ministers who may be affected (specifically, the Minister of Transport and Urban Development, Minister for Greater Christchurch Regeneration, and Minister of Conservation).
- All local authorities within the Canterbury Region and other partners of the Greater Christchurch Partnership (the NZTA, Canterbury District Health Board, Regenerate Christchurch and Department of the Prime Minister and Cabinet).
- Te Rūnanga o Ngāi Tahu, as the iwi authority for the rohe.
- Mahaanui Kurataiao Ltd, which represents the interests of the Papatipu Rūnanga who hold manawhenua rights and interests in the Greater Christchurch area.

In addition, 133 letters, together with a leaflet explaining the background and scope of the Proposed Change, were sent to landowners within the proposed Future Development Areas.

The summary leaflet (attached as Appendix 5b) and a ‘tracked changes’ document showing the proposed changes to Chapter 6 of the CRPS (attached, as amended in response to feedback received, as Appendix 3) were made available on a web page set up for the consultation.

Feedback was invited from all parties on the draft amendments to Chapter 6. Feedback was also sought on the potential to use a streamlined planning process.

A summary of the pre-notification consultation and feedback received is attached as Appendix 5a to this document.

It is noted that the Ministers for Transport and Urban Development and Greater Christchurch Regeneration, who may have an interest in the Proposed Change, were emailed a copy of the proposed draft provisions for comment. However, no feedback was provided.

Summary of consultation on Our Space 2018-2048: Greater Christchurch Settlement Pattern Update

Widespread public consultation was undertaken as part of the development of Our Space. Formal public consultation (under Part 6 of the Local Government Act 2002) on a draft Our Space document took place from 1 November to 30 November 2018. This included stakeholder mailouts, public notices and press releases, targeted engagement and workshops, presentations and seminars, and public drop in sessions.

Ninety-two submissions were received on Our Space. Public hearings occupied 5 days, commencing 25 February 2019. The hearing provided an opportunity for submitters wishing to be heard to present their submission points to the Hearings Panel.

The role of the Hearings Panel was to consider the content of all submissions and make recommendations to the Greater Christchurch Partnership following the hearings on Our Space. Following the consideration of submissions, hearing from submitters and receiving of an Officers' Report, the Hearings Panel held deliberations and made recommendations to the Greater Christchurch Partnership Committee on changes considered necessary to the draft Our Space document. The report and recommendations of the Hearings Panel, including recommended changes to Our Space, was published on 5 June 2019 (<http://greaterchristchurch.org.nz/ourspace/>).

Submissions on Our Space included comments on the proposed identification of the Future Development Areas in Rolleston, Rangiora and Kaiapoi, the need to change the CRPS, and the potential use of the RMA streamlined planning provisions to make that change. Landowners within the Future Development Areas supported their identification. Other submitters sought that their land also be identified for future urban development, however the Hearings Panel considered it more appropriate for the inclusion of those areas to be considered as part of the full review of the CRPS. A range of views were expressed in relation to the principle of urban expansion. A full summary of the key themes raised by submitters on Our Space is set out in the Officer's Report dated 8 February 2019 (<http://greaterchristchurch.org.nz/assets/Uploads/Officers-Report-for-Our-Space.pdf>).

The direction provided in the Hearing Panel Recommendation Report and through recommended changes to Our Space informed the drafting of the Proposed Change.

Further detail of the consultation undertaken in the development of Our Space is provided as Appendix 4.

Part VI: Implications of the proposal for any relevant iwi participation legislation

There is currently no Mana Whakahono a Rohe: Iwi participation arrangement in this rohe.

There is a Relationship Agreement between Ngā Papatipu Rūnanga and Environment Canterbury dated 7 December 2012. This sets out clear and consistent expectations for how the relationship between Ngā Papatipu Rūnanga and Environment Canterbury will operate.

The Agreement provides that relationship engagement will occur through Te Ropu Tuia engagement, direct rūnanga engagement, operational engagement and membership on Environment Canterbury Committees.

Te Rūnanga o Ngāi Tahu (**Te Rūnanga**), the iwi authority for the rohe, is a partner in the Greater Christchurch Partnership. Te Rūnanga was represented at a governance, chief executive and staff level throughout the preparation and finalisation of Our Space. Te Rūnanga also appointed Mahaanui Kurataiao Limited to contribute to Our Space, to ensure mana whenua cultural values are reflected and considered as part of Greater Christchurch's settlement planning, and to liaise with rūnanga kaitiaki throughout the process.

Environment Canterbury met with staff at Te Rūnanga on 10 July 2019 to outline the Proposed Change and process for Schedule 1 RMA consultation. Te Rūnanga was also consulted in accordance with clause 3(1)(d) prior to the submission of this application. Further pre-notification engagement with Te Rūnanga under clause 4A of the RMA is underway and ongoing during the Minister's consideration of this application. It is proposed that Environment Canterbury will report back to the Minister following completion of engagement with Te Rūnanga under clause 4A of the RMA.

Appendix 1a

Our Space 2018-2048: Greater Christchurch Settlement Pattern Update Whakahāngai O Te Hōrapa Nohoanga

<http://greaterchristchurch.org.nz/ourspace/>

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Appendix 1b

Housing and Business Development Capacity Assessment March 2018 Te Arotake i te Whakawhanaketanga ā-Whare, ā-Umanga hoki

<http://greaterchristchurch.org.nz/background/our-space/>

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Appendix 2

Identification of the Future Development Areas 2007-2019

The Greater Christchurch Partnership⁵ (previously the Greater Christchurch Urban Development Strategy Committee) has worked collaboratively over more than a decade on planning and managing urban growth and development in Greater Christchurch to support the long-term needs of people and communities, including through the development of the Greater Christchurch Urban Development Strategy (**UDS**) and subsequent updates.

The Future Development Areas (**FDAs**) in Rolleston, Rangiora and Kaiapoi have been identified as locations for future growth since 2007.

Urban Development Strategy 2007

In 2007 the Greater Christchurch UDS was adopted by Environment Canterbury, Christchurch City Council, Selwyn District Council and Waimakariri District Council.

The UDS provides the strategic direction for urban growth in Greater Christchurch to 2041. The settlement pattern seeks to consolidate development in and around well-defined urban and rural town centres. It includes the identification of Rolleston, Rangiora and Kaiapoi as indicative growth areas.

Community consultation undertaken during development of the UDS resulted in over 3,250 submissions on the initial growth management options for the area. A Community Charter was developed from the feedback received, and this formed the foundation for the development of the detailed strategy, including its vision, guiding principles, strategic directions and a framework for implementation.

The UDS contains an action plan to implement the strategic directions and the Greater Christchurch settlement pattern. One of the priority actions was to prepare Chapter 12A of the Canterbury Regional Policy Statement (**CRPS**) to provide specific guidance on where growth and intensification will occur based on the settlement pattern in the UDS.

Proposed Change 1 to the Canterbury Regional Policy Statement (Chapter 12A)

Proposed Change 1 (**PC1**) – Chapter 12A to the CRPS – was notified in 2007. It provided the sub-regional policy framework under the RMA to implement the UDS, setting out direction for the growth, development and enhancement of the urban and rural areas of Greater Christchurch for the period to 2041. PC1 (Map 1) identified ‘Urban Limits’ – being the extent of greenfields development

⁵ The Greater Christchurch Partnership comprises: Christchurch City Council, Environment Canterbury, Selwyn District Council, Waimakariri District Council, Te Rūnanga o Ngāi Tahu, New Zealand Transport Agency, Canterbury District Health Board, Department of Prime Minister and Cabinet, and Regenerate Christchurch

within Greater Christchurch, to provide for growth to 2041. The areas now referred to as FDAs were included within the Urban Limits.

A hearing was held on PC1, by an independent panel, and some changes were recommended – however, these changes did not include the land within the FDAs.

At the time of the February 2011 earthquake PC1 was subject to appeals in the Environment Court, some of which were mediated.

When the Canterbury Earthquake Recovery Act 2011 (**CER Act**) came into force, the UDS Partners (now the Greater Christchurch Partnership) asked the Minister for Canterbury Earthquake Recovery (**the Minister**) to insert a modified version of PC1 into the CRPS under section 27 of the CER Act. This had the effect of making PC1, which was inserted as Chapter 12A of the CRPS, operative and removing the appeals from the Environment Court. The modified version was PC1 with some amendments to respond to the earthquake and some changes that had been sought by the Christchurch City Council and Waimakariri District Council through appeals lodged with the Environment Court.

Independent Fisheries Limited (**IFL**) lodged an application for Judicial Review in the High Court against the Minister's decision to insert Chapter 12A into the CRPS on the basis that the Minister had incorrectly used his powers under the CER Act. That application by IFL was successful and Chapter 12A was removed from the CRPS and the Environment Court appeals were reinstated.

The Minister and UDS Partners appealed the High Court decision to the Court of Appeal. Although the Court of Appeal determined that the Minister incorrectly used his section 27 powers at the time, the Court of Appeal confirmed that Chapter 12A could have been inserted into the CRPS through a recovery plan process. In all other respects the High Court decision was overturned and the Environment Court appeals lapsed.

Environment Canterbury was subsequently directed by the Minister to prepare a recovery plan.

Land Use Recovery Plan 2013

The Land Use Recovery Plan (**LURP**) is a statutory document, prepared by Environment Canterbury in collaboration with Te Rūnanga o Ngāi Tahu, Christchurch City Council, Selwyn District Council, Waimakariri District Council, the New Zealand Transport Agency and the Canterbury Earthquake Recovery Authority (**CERA**) under the CER Act. Its purpose was to provide for residential and business land use to support recovery and rebuilding to 2028.

The LURP identified greenfield priority areas for new residential subdivisions sufficient to meet anticipated demand through to 2028, based on the direction set out in PC1. Additional greenfield areas identified in PC1 through to 2041 (including the areas identified as FDAs in Our Space and this Proposed Change) were not included as greenfield priority areas but were included within a Projected Infrastructure Boundary (**PIB**).

The LURP directed changes to RMA documents, including amendments to district plans, and the insertion of Chapter 6 in the CRPS. Chapter 6 was a further revised version of Chapter 12A.

Once the LURP was approved by the Minister, Chapter 6 was inserted into the CRPS.

Chapter 6 of the Canterbury Regional Policy Statement

Chapter 6 of the CRPS provides for growth to 2028 (rather than to 2041) due to the timeframes of the recovery legislation under which Chapter 6 was inserted into the CRPS. The recovery plan could only provide direction for residential and business land use development to support recovery and rebuilding across Greater Christchurch for the next 10–15 years. Greenfield areas identified in PC1 through to 2041 (including the areas identified as FDAs in Our Space and this Proposed Change) were therefore not included as greenfield priority areas but were included within a PIB in Map A of the CRPS. These areas have been subject to spatial planning exercises by Selwyn and Waimakariri District Councils as part of considering future development within the PIB.

Appendix 3

Proposed Change to Chapter 6 of the Canterbury Regional Policy Statement

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Appendix 4

Our Space Consultation Summary

A *Our Space 2018-2048 – Draft for Consultation* document was published for public feedback from 1 November to 30 November 2018.

The draft document was published on the Greater Christchurch Partnership’s website, and hard copies were available at the Christchurch City Council Civic Offices, Selwyn District Council Offices, Waimakariri District Council Offices, Environment Canterbury Offices, libraries and other service centres in Christchurch City, Selwyn and Waimakariri.

Supporting material, including the draft Summary Capacity Assessment and various technical documents, were also published on the Partnership’s website and made available in hard copy on request.

Submissions were invited in written, electronic and audio format. An online submission form was provided that included nine consultation questions, as set out in the following table, seeking views on the key issues arising in *Our Space*.

Consultation Questions	
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 or disagree with this approach and why?
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 or disagree with this approach and why?
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 different models to make it easier for people to own their own home. What elements should be included in this action plan?
4	Our Space adopts the current planning framework that directs new commercial development (office and retail) to existing centres to retain their viability and vitality, especially the central city, suburban centres and town centres in Selwyn and Waimakariri. Do you agree or disagree with this approach and why? What further measures would support such development?
5	The Canterbury Regional Policy Statement and the District Plans for Christchurch City and Selwyn and Waimakariri Districts have already identified sufficient capacity for new industrial businesses. Do you agree or disagree this is sufficient and in the right location and why?
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 our evidence base and why?
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 an intention to deliver rapid transit along the northern and south-west transport corridors. Do you agree or disagree with this approach and why?
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?
9	What other points do you wish to make to inform the final Our Space 2018-2048: Greater Christchurch Settlement Pattern Update?

Public notice and press release

A public notice setting out details of the consultation was placed in the following publications:

- The Press (on Wednesday 31 October and Saturday 3 November)
- The Star (on Thursday 1 November)
- Selwyn Times (on Tuesday 6 November)
- The News (formerly Hurunui News/North Canterbury News) (on Thursday 8 November)

To coincide with the consultation period, a media release was prepared and distributed to the above local media on Wednesday 31 October. The Press also published an article that featured the consultation on *Our Space* on Friday 23 November.

Stakeholder mailout

On 1 and 23 November, emails were sent to over 550 key stakeholders informing them of the consultation. Such stakeholders included government departments, iwi authorities, property developers, social housing providers, requiring authorities, infrastructure providers, significant landowners, residents' associations and business associations.

The stakeholder database was established at the commencement of the settlement pattern review project and was used periodically throughout 2017 and 2018 to raise awareness of the work being undertaken to meet the requirements of the NPS-UDS. Relevant stakeholder information was obtained through reference to partner council's stakeholder databases and augmented with additional organisations needed to comply with policy PB5 of the NPS-UDC.⁶

⁶ Policy PB5 of the NPS-UDC requires local authorities to seek and use the input of iwi authorities, the property development sector, significant landowners, social housing providers, requiring authorities, and the providers of development infrastructure and other infrastructure when preparing a capacity assessment.

Partner councils were able to forward these communications to further stakeholders. Waimakariri District Council also separately notified landowners within their proposed future development areas by letter.

Webpage

A dedicated *Our Space* consultation webpage was established on the Partnership website in October 2018 and a submissions page “went live” on 31 October. Details of the consultation were also published on the websites of partner councils, with a direct link provided to the *Our Space* webpage.

Analysis of the website traffic shows that the *Our Space* webpage was viewed 840 unique times during the consultation period. The *Our Space* document was downloaded 837 times.

Public drop-in sessions

The following four public information drop-in sessions were held during the consultation period:

- Rangiora Town Hall, Monday 12 November, 5.00-7.00pm
- Kaiapoi Service Centre, Tuesday 13 November, 5.00-7.00pm
- Selwyn District Council Offices, Wednesday 14 November, 3.30-6.30pm
- Christchurch City Council Civic Offices, Thursday 22 November, 5.30-7.30pm

The drop-in sessions were publicised on the Partnership and partner council’s websites, as well as via an A5 flyer, mailouts, social media channels, the public notice and in the *Our Space* document itself. Despite this widespread communication, only ten people attended the drop-in sessions, including four in Rangiora, one in Kaiapoi, one in Rolleston and four in Christchurch.

Stakeholder and partner engagement

A series of targeted stakeholder engagement sessions were held on *Our Space* throughout November. The feedback from stakeholder engagement on the previous phase of preparing a Capacity Assessment has also been considered as part of this Officers Report.

Stakeholder review workshop

A cross-sector stakeholder review workshop, facilitated by Community Public Health (CPH), was held on 26 November. This workshop was signalled as part of the formal consultation process agreed to by the Greater Christchurch Partnership Committee. A total of 25 invited participants attended the workshop from various economic, community, transport, development, building, education and business sectors.

Healthy Greater Christchurch seminar

On 12 November, a lunchtime seminar was held for Healthy Greater Christchurch signatories and the public. The seminar included a presentation and subsequent discussion on *Our Space*, and attracted 15 attendees. Participants were encouraged to consider making formal submissions given the discussion was not formally recorded.

Our Space presentations

An overview of *Our Space* and the consultation was presented at the following meetings:

- Healthy Greater Christchurch Advisory Group (on Wednesday 24 October)
- Canterbury Government Leaders Group (on Friday 2 November)
- Waipounamu Community Housing Providers Network (on Thursday 22 November)

- Youth Councils and Youth Voice Canterbury (on Tuesday 27 November)

Christchurch City Council staff also provided presentations to a number of their local Community Boards.

Ngāi Tahu engagement

Te Rūnanga o Ngāi Tahu is a partner in the Greater Christchurch Partnership, represented at a governance, chief executive and staff level throughout the preparation and finalisation of *Our Space*.

Te Rūnanga o Ngāi Tahu appointed Mahaanui Kurataiao Limited to contribute to *Our Space*, ensure mana whenua cultural values are reflected and considered as part of Greater Christchurch's settlement planning, and liaise with rūnanga kaitiaki throughout the process.

Te Rūnanga o Ngāi Tahu appointed Gail Gordon as a member of the Hearing Panel and have three representatives on the Greater Christchurch Partnership Committee.

Links with the Canterbury Regional Public Transport Plan

The draft Canterbury Regional Public Transport Plan (RPTP) was published for public consultation from 17 September until 14 October 2018. Consultation material produced for the draft RPTP included reference to the future development strategy being developed by the Greater Christchurch Partnership and highlighted linkages between the two strategic planning documents. Over 700 submissions were received on the draft RPTP.

Submissions

A total of 92 submissions, including four late submissions, were received from a range of individuals, groups and organisations in response to *Our Space*.

Key submission themes and a qualitative analysis of submissions are set out in Section 4 and Appendix E of the [Officers' Report](#) respectively.

Hearings Panel

The Greater Christchurch Partnership Committee, at its meeting on 13 July 2018, established a sub-committee to act as the Hearings Panel for this consultation, to be undertaken in accordance with Part 6 of the Local Government Act 2002. The Hearings Panel was delegated responsibility to make recommendations to the GCP Committee on any changes considered necessary to the draft, as set out in its [Terms of Reference](#).

Members appointed to the Hearings Panel were: Bill Wasley, GCP Independent Chair (Chair); Cllr Peter Skelton, Canterbury Regional Council; Cllr Sara Templeton, Christchurch City Council; Deputy Mayor Malcolm Lyall, Selwyn District Council; Cllr Neville Atkinson, Waimakariri District Council; Gail Gordon, Te Rūnanga o Ngāi Tahu (Ngāti Wheke); Ta Mark Solomon, Canterbury District Health Board; Jim Harland, New Zealand Transport Agency (non-voting).

Hearings and Deliberations

Further to a public consultation period from 1 November to 30 November 2018, the Hearings Panel convened to hear from submitters wishing to be heard, review the content of all submissions and make recommendations on changes to the consultation draft.

Hearings and deliberations were held between 25 February and 1 March, 11 March to 12 March, 29 April, 10 May, 31 May and 5 June 2019. The hearings and deliberations were open to the public to attend.

Hearings Panel Recommendations

As set out in the executive summary of the [Hearings Panel Recommendations Report](#);

“[4] The key findings on the evidence presented to us are:

- a. The methodology for undertaking the capacity assessment to determine sufficient, feasible capacity for housing and business is adequate for the present purpose. Future changes to the methodology (including a common agreed methodology between local authorities) can be undertaken for future capacity assessments.*
- b. Monitoring, future capacity assessments, and analysis of population projections provide for a responsive planning framework.*
- c. A targeted change to the Canterbury Regional Policy Statement to be promulgated in 2019 will be limited to those areas identified in Our Space for future residential development. This will enable Selwyn and Waimakariri District Councils to provide for short to medium term capacity in their district plans.*
- d. No additional development areas are proposed to be added to those identified in the areas notified. The merits of any further additional areas will be considered as part of the full review of the Canterbury Regional Policy Statement. This will include consideration of the vision and principles of the UDS.*
- e. New development in Selwyn and Waimakariri Districts is expected to achieve a minimum net density of 12 households per hectare. Further work on minimum densities will be undertaken as part of the full review of the Canterbury Regional Policy Statement.*
- f. Further emphasis is required to recognise sustainability in Our Space, including recognition of the effects of climate change and sea-level rise, and the contribution of a compact urban form to transport efficiency and public transport.*
- g. We are satisfied that Our Space appropriately implements the provisions of the NPS-UDC.”*

Endorsement by the Greater Christchurch Partnership Committee

On 14 June 2019 the Greater Christchurch Partnership Committee unanimously endorsed the final Our Space 2018-2048, having endorsed the Recommendations Report of the Hearings Panel.

The Greater Christchurch Partnership Committee recommended that Partner Councils (Christchurch City Council, Environment Canterbury, Selwyn District Council, and Waimakariri District Council) adopt the final version of Our Space 2018-2048; and that the Canterbury District Health Board, Te Rūnanga o Ngāi Tahu, New Zealand Transport Agency, Regenerate Christchurch and the Department of the Prime Minister and Cabinet convey their support for the final version of Our Space 2018-2048.

Adoption of *Our Space* by Partner Councils

Our Space was formally adopted by Environment Canterbury, Christchurch City Council, Selwyn District Council, and Waimakariri District Council in June / July 2019.

Appendix 5a

Summary of Schedule 1 Clause 3 Consultation on draft Proposed Change to Chapter 6 of the Canterbury Regional Policy Statement

Clause 3(1), Schedule 1 to the RMA includes requirements to consult certain parties during the preparation of a proposed plan. In accordance with this, emails with links to a copy of the proposed draft provisions were sent to the following parties for comment:

- Minister for the Environment
- Minister of Transport and Urban Development
- Minister for Greater Christchurch Regeneration
- Minister of Conservation
- Ashburton District Council
- Timaru District Council
- Mackenzie District Council
- Waitaki District Council
- Waimate District Council
- Waimakariri District Council
- Kaikoura District Council
- Christchurch City Council
- Hurunui District Council
- Selwyn District Council
- Summit Road Protection Authority
- New Zealand Transport Agency
- Canterbury District Health Board
- Regenerate Christchurch
- Greater Christchurch Partnership
- Department of the Prime Minister and Cabinet
- Te Rūnanga o Ngāi Tahu (the Iwi Authority for the rohe)
- Mahaanui Kurataiao Ltd (which represents the interests of the Papatipu Rūnanga who hold manawhenua rights and interests in the Greater Christchurch area)

In addition, 133 letters, together with a summary leaflet explaining the background and scope of the draft Proposed Change, were sent to landowners within the proposed Future Development Areas (FDAs).

The summary leaflet and a 'tracked changes' document showing the proposed amendments to Chapter 6 and Map A were made available on a web page set up for the consultation.

Feedback was invited on the draft Proposed Change to Chapter 6 of the Canterbury Regional Policy Statement (**CRPS**) and on the potential to use a Streamlined Planning Process, between Monday 29 July and Friday 16 August 2019.

A total of 17 written replies were received, as follows:

Central and local government

No feedback was received from Ministers or from territorial authorities outside of Greater Christchurch.

Responses were received from the three Greater Christchurch territorial authorities, being Waimakariri and Selwyn District Councils, and the Christchurch City Council (see below).

Greater Christchurch Councils and other partners

Selwyn District Council and Waimakariri District Council provided feedback in support of the scope and content of the draft Proposed Change. The responses from both councils supported the use of a Streamlined Planning Process and referred to the need for the change to the CRPS to inform their District Plan Review processes currently underway and to give effect to the requirements of the National Policy Statement on Urban Development Capacity (**NPS-UDC**).

The response from the Christchurch City Council set out a number of comments to assist with the development of the draft Proposed Change, which are summarised in Table 1 below.

No feedback was received from the other Greater Christchurch Partnership agencies.

Tangata whenua and iwi

Environment Canterbury met with staff at Te Rūnanga o Ngāi Tahu on 10 July 2019 to outline the draft Proposed Change and process for Schedule 1 RMA consultation. No feedback was received in response to the Schedule 1 consultation from either Te Rūnanga o Ngāi Tahu or Mahaanui Kurataiao Ltd.

Landowners

Twelve responses were received on behalf of landowners within the proposed FDAs. The key points are summarised in Table 1 below.

Two further responses were received on behalf of parties who own or hold an interest in land outside the proposed FDAs and were not included in this Schedule 1 consultation. These two responses are summarised separately in Table 1.

Table 1: Summary of points raised in Schedule 1 pre-notification consultation

Respondent	Summary of points raised	Council response
Selwyn District Council (SDC)	<ul style="list-style-type: none">- Supports the Proposed Change as drafted and the request to use a Streamlined Planning Process.- Refers to the need for the Proposed Change to the CRPS to inform its District Plan Review process currently underway and to give effect to the requirements of the NPS-UDC.	Noted.

Respondent	Summary of points raised	Council response
	<ul style="list-style-type: none"> - Notes SDC modelling and analysis indicates a significant shortfall in residential capacity over the medium term and that, if flexibility to accommodate growth within Rolleston is not provided, the ability of the council to continue to provide affordable housing and choice – and to meet residential growth demands – will be significantly constrained. - Given the extent of consultation undertaken for Our Space, SDC supports consultation on the Proposed Change being limited to those affected and does not consider a hearing is necessary. 	
Waimakariri District Council (WDC)	<ul style="list-style-type: none"> - Supports the Proposed Change as drafted and the request to use a Streamlined Planning Process. - Refers to the need for the Proposed Change to the CRPS to inform its District Plan Review process currently underway and to give effect to NPS-UDC requirements. 	Noted.
Christchurch City Council (CCC)	<ul style="list-style-type: none"> - Suggests it might be helpful if the Proposed Change includes the minimum density of 12 households per hectare within the proposed FDAs committed to in Our Space. - Suggests it might be helpful if the CRPS makes it clearer that additional capacity will only be provided to meet a medium-term shortfall; that an assessment as to whether Selwyn should be included in the Proposed Change should take place at a later stage and only if the next capacity assessment demonstrates a housing capacity shortfall; and that the determination of whether there is a housing shortfall should be based on the outcome of a Future Development Strategy (FDS) rather than monitoring. 	<p>A minimum density of 12 households per hectare within FDAs has already been agreed to by the Greater Christchurch Partnership councils in adopting Our Space and will be given effect to through district planning processes.</p> <p>The Proposed Change includes changes to Map A which identifies the land likely to be required to meet housing demand over the medium (10 years) to long term (30 years) and enables SDC and WDC to zone additional land within FDAs only where necessary to meet a medium-term shortfall against their housing targets. Future Housing and Business Capacity Assessments (HBAs) will need to demonstrate this shortfall. The response from SDC notes that its modelling and analysis indicates a shortfall in residential capacity over the medium term.</p> <p>As currently drafted, any housing shortfall will be determined against the</p>

Respondent	Summary of points raised	Council response
		<p>housing targets (which are set through the FDS) and up to date HBA.</p> <p>As drafted, the Proposed Change would enable the District Councils to respond to demonstrated demand without requiring subsequent amendments to the CRPS. It also aligns with the direction provided by Our Space.</p>
	<ul style="list-style-type: none"> - Suggests it would have been helpful if all submitters on Our Space were included in the pre-notification consultation on the Proposed Change. 	<p>Environment Canterbury identified landowners within the FDAs as being directly affected by the Proposed Change on the basis that their land is being identified for potential future development and development of that land will be affected by the Proposed Change.</p> <p>Other parties will have the opportunity to participate through written submissions if the Proposed Change is publicly notified.</p>
	<ul style="list-style-type: none"> - Suggests it might be helpful for there to be a hearing as part of a Streamlined Planning Process. 	<p>The areas of land identified as FDAs were the subject of a past hearing on Proposed Change 1 to the CRPS (see Appendix 2 for further detail regarding this process). Given this, and the consultation that has very recently occurred for Our Space - which included five days of public hearings - and the opportunities for further participation when the District Councils re-zone land within the FDAs, Environment Canterbury does not consider a hearing is necessary as part of a streamlined planning process for this narrow change to Chapter 6 of the CRPS.</p>
<p>Landowners within proposed Future Development Areas (12 responses)</p>	<ul style="list-style-type: none"> - Majority support the identification of the FDAs and the principle of the Proposed Change. Many note the need for additional residentially zoned land. - No responses opposed the Proposed Change in its entirety, although a number seek amendments to the draft provisions (see below). - Some seek immediate re-zoning and/or the inclusion of their land as a Greenfield Priority Area. - Two responses note the loss of the 'rural feel' of their properties due to 	<p>Many of the suggested changes to provisions are outside the scope of the Proposed Change, do not align with the direction provided by Our Space, or are more appropriately considered as part of the full review of the CRPS, and have therefore not been incorporated as changes.</p> <p>Some amendments have been made in response to the comments received, including changes to wording to better align with the NPS-UDC and to clarify the date of the scheduled full review of the CRPS.</p>

Respondent	Summary of points raised	Council response
	<p>the proximity and impacts of urban development.</p> <ul style="list-style-type: none"> - One response seeks to ensure land does not become landlocked and retains rural rating status. - Various amendments to policies sought, including to provide additional references to the NPS-UDC and to be consistent with and give effect to the NPS-UDC, and to remove the requirement for a 'collaborative approach' to the HBA. - Amendments sought to policies and explanations to be consistent with Our Space actions, including commitment to notification of the full review of the CRPS in 2022. - Some seek the addition of a new policy that provides flexibility to accommodate development in other locations / circumstances. - One response expressly supports the use of a Streamlined Planning Process. - One response supports a hearing as part of a Streamlined Planning Process. - The majority of responses (10) did not comment specifically on the potential use of a Streamlined Planning Process. However, of these respondents, four indicate support for making the changes to the CRPS expediently. 	
<p>Landowners outside proposed Future Development Areas (2 responses)</p>	<ul style="list-style-type: none"> - Seek the inclusion of additional land at Rangiora and Prebbleton as FDAs on Map A. - Seek various amendments to policies to provide additional references to the NPS-UDC and to be consistent with and give effect to the NPS-UDC. - Seek various amendments to policies and explanations to be consistent with Our Space actions, including commitment to notification of the full CRPS review in 2022. 	<p>These parties were not directly consulted during pre-notification consultation, as they do not own land within the proposed FDAs.</p> <p>This is a targeted change to Chapter 6 to implement the urban growth strategy set out in Our Space and give effect to the NPS-UDC. The inclusion of other/additional land within Map A is outside the scope of the Proposed Change. As per the recommendations of the Hearing Panel for Our Space, this is more appropriately considered as part of</p>

Respondent	Summary of points raised	Council response
	<ul style="list-style-type: none"> - Suggest the addition of a new policy that provides flexibility to accommodate development in other locations / circumstances. - Support the use of a standard Schedule 1 process (not Streamlined Planning Process). 	<p>the full review of the CRPS (which will occur by way of a standard Schedule 1 process, including hearings).</p> <p>Many of the other suggested changes to provisions are outside the scope of the Proposed Change, do not align with the direction provided by Our Space, or are more appropriately considered as part of the full review of the CRPS, and have therefore not been incorporated as changes.</p> <p>Some amendments have been made in response to the comments received, including changes to wording to better align with the NPS-UDC and to clarify the date of the scheduled review of the CRPS.</p>

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Appendix 5b

**Summary leaflet prepared for pre-notification consultation on Draft
Proposed Change to Chapter 6 of the CRPS**

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