

From: [Lisa Steele](#)
To: [Mailroom Mailbox](#)
Subject: Chapter 6 CRPS submission
Date: Friday, February 12, 2021 3:20:02 PM
Attachments: [Markham Trust Submission on PC 1 to Ch6 RPS .pdf](#)

Please find attached a submission on proposed change 1 to Chapter 6.

Regards,




Lisa Steele - Consultant Planner

Hours: Monday, Tuesday, Thursday, Friday, 9am – 330pm

DDI: 03 595 1895 **M:** 022 153 7909 **E:** lisa@planzconsultants.co.nz **W:** planzconsultants.co.nz

P: PO Box 1845, Christchurch 8140 **A:** 124 Peterborough Street, Christchurch 8013

Notice: The information in this email is confidential and is intended only for the use of the addressee named above. If you are not the intended recipient, you are hereby notified that any dissemination, copying or use of this information is strictly prohibited. If you have received this email in error, please reply to the author by return email, and delete the original message. Thank you.

 Please consider the environment before printing this email.

**CLAUSE 6 OF THE FIRST SCHEDULE, RESOURCE MANAGEMENT ACT
1991**

**SUBMISSIONS ON
PROPOSED CHANGE 1 TO CHAPTER 6 OF THE CANTERBURY
REGIONAL POLICY STATEMENT**

TO: Canterbury Regional Council
Via email: mailroom@ecan.govt.nz

SUBMITTER:

Name:	Markham Trust
Contact:	JP Singh
Mobile:	0212702494
Email:	jpnznz@gmail.com

ADDRESS FOR SERVICE:

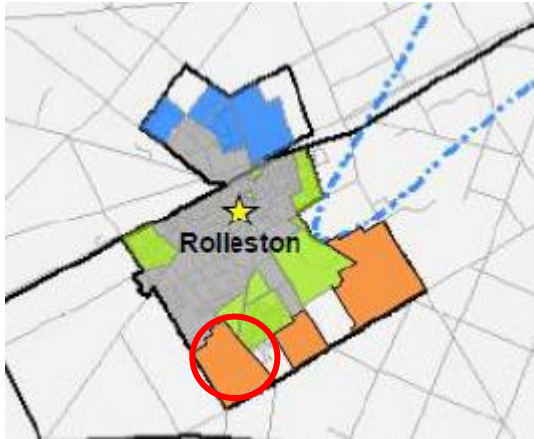
Contact:	Lisa Steele, Consultant Planner
Company:	Planz Consultants Ltd
Mobile:	0221537909
Email:	lisa@planzconsultants.co.nz

Markham Trust could not gain an advantage in trade competition through this submission.

The specific provisions of the proposal that this submission relates to are:

Markham Trust welcomes the opportunity to submit on Proposed Change 1 (PC1) to Chapter 6 of the Regional Policy Statement (RPS).

Markham Trust own a 4ha block of land in Rolleston known as 545 East Maddisons Road and legally described as Lot 1 DP326339. This block is located within a portion of the proposed Future Development Area shown in the below Map A extract:



The block has long been identified as being within an 'infrastructure boundary' and in principle appropriate for urbanisation. The land on either side of this growth area have been consented as Special Housing Areas and are currently under development. Showing them as 'rural' in Map A therefore miscommunicates the developing urban form of Rolleston. The majority of the 'greenfield' areas shown on Map A have likewise been physically developed or have granted subdivision consents in place. Showing what is in reality an existing urban environment as greenfield potential severely overstates the current capacity in Rolleston.

Rolleston has experienced high rates of growth over the past decade. There is currently a waiting time of approximately one year to secure titled, serviced, and development-ready sections. There is a considerable lag period between identifying a capacity need, undergoing a plan change process, undergoing a subdivision consent process, construction tendering, undertaking bulk earthworks and infrastructure delivery and undertaking final survey and titling, before sections can truly be described as being development ready and able to be built on to contribute towards a physical increase in housing capacity.

Proposed Policy 6.3.12 places an unnecessary barrier to the timely delivery of housing capacity. The block in question has already been identified as being appropriate in principle for urbanisation. A private plan change (PC64) is currently being processed by Selwyn Council to develop this block for housing, with the submissions and further submission periods having closed and a hearing a decision anticipated in the next few months.

The submission points on the proposed change are contained in the table below:

Provision	Support/ Oppose	Comments	Relief Sought
Policy 6.3.12	Oppose	The NPS-UD sets minimum capacity requirements. There is no NPS reason to prevent District Plans from providing more capacity than the minimum required, provided such areas are able to be appropriately serviced and integrated. The Policy 6.3.12(1) trigger that enables development only where monitoring undertaken by the Greater Christchurch partnership (GCP) has identified a need for further development capacity places an unnecessary barrier to the timely delivery of growth in Map A locations that have long been identified as being suitable for urbanisation. Clause (1) is better framed as a method to implement that policy i.e. Councils be required to monitor capacity and if there is a clear shortfall then proactively bring forward urban zoning. The NPS-UD minimum capacity requirements are a direction to Councils to provide at least the minimum necessary, not as a direction to prevent more than the minimum from occurring.	Amend policy 6.3.12 to delete clause (1) and transfer Clause (1) to be a method to implement the Policy
Map A	Support in part	Support the identification of the subject block as being an area that is suitable in principle for urbanisation. There is very limited 'development-ready' capacity within Rolleston, certainly within a medium term/ 10 year timeframe. Given the lag in getting land rezoned and serviced in order to ensure necessary capacity is achieved the FDA block subject to this submission should be shown as Greenfield.	Amend the map to identify the FDA areas within Rolleston as Greenfield development areas.
Map A	Oppose	Map A does not recognise existing urban areas that have already been consented and are in the process of being developed for residential activities under the former Housing Accord and Special Housing Areas legislation. These areas are shown white, as if they are rural land.	Update Map A to show existing or consented urban areas on either side of the subject block as either 'existing urban' (grey shading) or greenfield (green shading)

Map A	Oppose	For Map A to be a genuine representation of development capacity then the already developed or subdivision consented greenfield areas should be shown as grey/ existing urban. Such a change to the map to accurately reflect the current environment would enable a much more accurate graphic representation of potential development capacity and would illustrate that there is in practice very little 'greenfield' land remaining in Rolleston.	Update Map A to show already developed or consented greenfield areas as grey/ existing urban.
-------	--------	---	---