

From: [Laura Dance](#)
To: [Mailroom Mailbox](#)
Cc: [Claire McKeever](#)
Subject: Chapter 6 CRPS submission
Date: Monday, 15 February 2021 8:48:16 am
Attachments: [image452597.png](#)
[image570241.png](#)
[image037763.png](#)
[Eliot Sinclair Submission to CRPS.PDF](#)

Good morning,

Please find attached a submission to Chapter 6 of the CRPS on behalf of Eliot Sinclair and Partners.

If you require anything further, please let us know.

Kind Regards,
Laura



Laura Dance

RESOURCE MANAGEMENT PLANNER

BEM MURR

Christchurch | Rangiora

Queenstown | Hokitika | Nelson

[eliot Sinclair.co.nz](https://www.eliot Sinclair.co.nz)



Caution: This email (including any attachments) may contain confidential and privileged information. If you have received it in error, please 1) notify the sender by return email (or telephone) and then delete this email, together with all attachments and your reply and 2) do not act on this email in any other way. Please visit <https://www.eliot Sinclair.co.nz/terms-conditions> for important information concerning this message. Thank you.

RMA FORM 5

Submission on publicly notified Proposed Change 1 to Chapter 6 of the Canterbury Regional Policy Statement

CLAUSE 6 OF SCHEDULE 1, RESOURCE MANAGEMENT ACT 1991

Note to person making submission:

The submission period for Proposed Change 1 to Chapter 6 of the Canterbury Regional Policy Statement closes at **5pm Monday 15 February 2021**.

To return this form you can:

- email it to **mailroom@ecan.govt.nz** (subject line: Chapter 6 CRPS submission)
- post it to **Customer Services, Environment Canterbury, PO Box 345, Christchurch 8140**

Your submission (or part of your submission) may be struck out if at least one of the following applies to the submission (or part of the submission):

- It is frivolous or vexatious.
- It discloses no reasonable or relevant case.
- It would be an abuse of the hearing process to allow the submission (or the part) to be taken further.
- It contains offensive language.
- It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

To: Environment Canterbury

1. Submitter details

Please note: all fields marked with an asterisk () are required.*

Name of submitter(s)* _____

Submitter address* _____

City/Town* _____ Postcode* _____

Contact name (if different from above) _____

Contact organisation _____

Contact email address _____

Contact address (if different from above) _____

City/Town _____ Postcode _____

Contact phone number _____

Please note that by making a submission your personal details, including your name and contact details, will be made publicly available in accordance with the Resource Management Act 1991. While all information in your submission will be included in papers which are available to the media and the public, your submission will be used only for the purpose of this process.

2. Trade competition declaration* (Please tick the statement that applies)

I could gain an advantage in trade competition through this submission.

☐ Yes ☐ No

If yes: I am directly affected by an effect of the subject matter of the submission that

(a) adversely effects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

☐ Yes ☐ No

Note: *If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.*

3. Submission details*

☐ I am enclosing further supporting information in addition to this submission form.

Provision to which my/our submission relates: <i>(Please specify the provision or other aspect of the proposed change your submission relates to)</i>	My/our position on this provision is: <i>(Select one option)</i>	My/our reasons for supporting/opposing the amended provisions are:	The decision I/we want is: <i>(Please specify if you want the provision to be retained, amended or deleted)</i>
	<input type="checkbox"/> Oppose in part <input type="checkbox"/> Oppose in full <input type="checkbox"/> Support in part <input type="checkbox"/> Support in full		
	<input type="checkbox"/> Oppose in part <input type="checkbox"/> Oppose in full <input type="checkbox"/> Support in part <input type="checkbox"/> Support in full		

2. Submission details*

	<input type="checkbox"/> Oppose in part <input type="checkbox"/> Oppose in full <input type="checkbox"/> Support in part <input type="checkbox"/> Support in full		
	<input type="checkbox"/> Oppose in part <input type="checkbox"/> Oppose in full <input type="checkbox"/> Support in part <input type="checkbox"/> Support in full		

Signature of submitter (or person authorised to sign on behalf of submitter) _____ **Date** _____

Note: A signature is not required if you make your submission by electronic means.

12 February 2021

Chapter 6 CRPS Submission
Environment Canterbury
Po Box 345
Christchurch 8140

Our reference: CRPS Chapter 6 Submission

Attention: Environment Canterbury

Submission to CRPS Proposed Change 1: Chapter 6

Eliot Sinclair and Partners is a multi-disciplinary consultancy that has been working with clients on land development projects since 1933. Whilst this submission is made on behalf of Eliot Sinclair and Partners, we are aware that the proposed changes to the CRPS directly impact many of our land development clients and their ability to continue developing land and providing residential housing in Greater Christchurch.

Provision to which our submission relates.

Our submission relates to the proposed Future Development Areas. We submit that the proposed changes to Chapter 6 of the Canterbury Regional Policy Statement do not enable enough developable land to become available. We submit that development within the Projected Infrastructure Boundary (PIB) needs to be prioritised, however the PIB needs to be flexible to enable more developable land to become available for residential rezoning and development to meet the growing housing demand and economic need.

Further flexibility is also needed to allow for rural-residential development, which currently can only be provided if the land is identified in an approved rural residential development strategy. Rural-residential development needs to reflect the flexibility of the PIB line for residential purposes, because flexibility within the FDA, GPA and PIB areas will affect the areas and extent of rural-residential.

Reasons for submission.

We consider that the proposed changes to the CRPS submission do not go far enough in bringing forward enough land and enabling development in Greater Christchurch. Demand for land has increased rapidly in the last few years seemingly at a rate where there is not enough supply of land identified to meet it. Amendments to policies and strategies can be a long and expensive process, which further delays the supply of developable land. We consider that while Chapter 6 of the CRPS is under review, steps should be taken now to ensure that there is greater flexibility to allow further development capacity for Greater Christchurch in the medium to long-term. We note that the recent confirmation of the repeal of the RMA introduces further uncertainties for the CRPS, and its eventual format under new legislation in the future. This influences the ability or further desire of the Regional Council to make further amendments in the meantime, in addition to those necessary under the NPS-Fresh Water in the interim.

The infrastructure boundary has not been reassessed in the proposed changes to Chapter 6, meaning that only a small area of land has been able to be identified as Future Development Areas. Greater flexibility, or a staged approach, for the infrastructure boundary and consequential development priority areas should be considered. For example, short-term, medium-term, and long-term future development areas could be identified to enable land to come forward for development more easily and more quickly when it is required. This would also enable land to come forward that is out of sequence or not anticipated to meet demand where it can meet certain criteria.

The National Policy Statement for Urban Development has objectives and policies that require local authorities to provide sufficient development capacity to meet demand over the short, medium and long term (Policy 2). We consider that the RPS is restrictive and does not provide the flexibility to be consistent with Policy 2 as it does not provide for sufficient development capacity in the medium or long term.

Clause 3.4 of the NPS-UD explains that development capacity should be plan-enabled. In the long term, this means identifying land for future urban use or urban intensification in a Future Development Strategy or any other relevant plan or strategy. It is considered that the proposed changes to Chapter 6 do not alleviate the issue of the supply of developable land. If the RPS was more enabling and flexible with greenfield priority areas and future development areas, then more development capacity would be available out-of-sequence to meet growing demand if required. Currently residential development in Greater Christchurch is restricted to the infrastructure boundary and greenfield priority areas in Map A, with no flexibility for other developable land, which does not enable development of other developable land in the long term.

We note that areas of land, particularly around Rangiora and Kaiapoi, are identified as greenfield priority areas and as future development areas however have significant hazard constraints for developing the sites for residential use. These sites require significant engineering and consultation with district and regional council to enable residential development. In light of this the density these areas are expected to provide may not be readily achievable.

In the case of rural-residential development, we are aware of many proposed residential developments, in areas such as Prebbleton, on land that is currently identified in a rural-residential strategy. If these are to be approved and developed, then there will be a loss of land identified as rural-residential and the rural-residential strategy would be out of date. The supply of rural-residential land to provide housing choice will need to be met somewhere else, but currently cannot because it would not be in accordance with the rural-residential strategy and the CRPS currently does not allow for any other rural-residential development not within a rural-residential strategy. This reinforces the need for the policies relating to rural-residential strategies to be flexible, much like the PIB, GPA, and FDA areas.

We understand the intent of the infrastructure boundary and understand the adverse effects of urban sprawl and effects on rural productive land if residential development is not appropriately managed. However, greater flexibility is needed to provide for development capacity to meet the current growing demand.

Decision sought.

In summary, our submission is to enable greater flexibility to allow medium and long-term development capacity and housing choice to become available to meet the growing demand for residential but also consequently for rural-residential. The decision sought is to allow greater flexibility in the objectives and policies of Chapter 6 of the CRPS, in relation to the infrastructure boundary and priority areas.

Residential development of land adjoining the infrastructure boundary, or greenfield priority areas, or future development areas shall be considered on its merits.

6.3.7 Residential location, yield and intensification – In relation to residential development opportunities in Greater Christchurch:

1. Subject to Policy 5.3.4 and Policy 6.3.12, residential greenfield development ~~shall~~ should occur in general accordance with Map A.

2. Any residential greenfield development that occurs outside of the projected infrastructure boundary or outside of a greenfield priority or future development area must:

- (a) Be adjacent to the infrastructure boundary or greenfield priority or future development area; and
- (b) Demonstrate the economic demand and need for the development over other development areas; and
- (c) Have service connections reasonably available to the site.

6.3.9 Rural residential development – In Greater Christchurch, rural residential development further to areas already zoned in district plans as at 1st January 2013 ~~can only~~ may be provided for by territorial authorities in general accordance with an adopted rural residential development strategy prepared in accordance with the Local Government Act 202, subject to the following:

- 1. Each rural residential development proposal and ODP shall be considered on its merits. Every rural residential development proposal shall be assessed on:
 - (d) Demand for rural residential; and
 - (e) Reasonable connections for servicing and utilities; and
 - (f) Effects on rural growth and production.

We anticipate the above will be subject to further discussions and amendments, or any other subsequential changes.

Yours faithfully



Claire McKeever

Resource Management Planner | Associate

BSurv(Hons) MS+SNZ MNZPI

claire.mckeever@eliotsinclair.co.nz