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To: [Mailroom Mailbox](#)
Cc: [Philip Kennard](#); [Will Salmond](#); [Richard Johnson](#)
Subject: Change 1 to RPS - Submission on behalf of Goulds Development Ltd and Four Stars Devt
Date: Monday, 15 February 2021 3:31:01 pm
Attachments: [image001.png](#)
[2067.C1_RPS_submission_with_appx.pdf](#)

Good afternoon!

Please find submission attached on Change 1 to the RPS lodged on behalf of Goulds Development Ltd and Four Stars Devt . Please acknowledge receipt by return. Thanks!

Kind regards

Fiona Aston

Principal

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Submission on Proposed Change 1 to Canterbury Regional Policy Statement

15 February 2020

Environment Canterbury

RESOURCE MANAGEMENT ACT 1991

ENVIRONMENT CANTERBURY

SUBMISSION ON THE PROPOSED CHANGE 1 TO THE CANTERBURY REGIONAL POLICY STATEMENT

Submitter Details

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Trade Competition:

Ability to gain a trade competition advantage through this submission - No

Provisions to Which this Submission Relates:

Change 1 in its entirety.

Position on these Provisions:

We oppose Change 1 in its entirety.

Reasons for opposing these Provisions (see also reasons under specific relief sought)

Background

The Submitters are a landowner group who are working together on rezoning proposals for their land ('the Site') at Levi Road, Lincoln-Rolleston Road and Nobeline Drive, Rolleston. The Site is 'sandwiched' between the current eastern boundary of Rolleston township, and the proposed District reserve adjoining to the east. The southern portion of the Site is within the Proposed Selwyn District Plan overlay, which corresponds with the Proposed Change 1 Future

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Development Area (FDA) in the case of Rolleston. The excluded area is land under the current airport noise contour, and the balance of the northern block in the same title but not under the contour (Four Stars Development harness racing stables and training track).

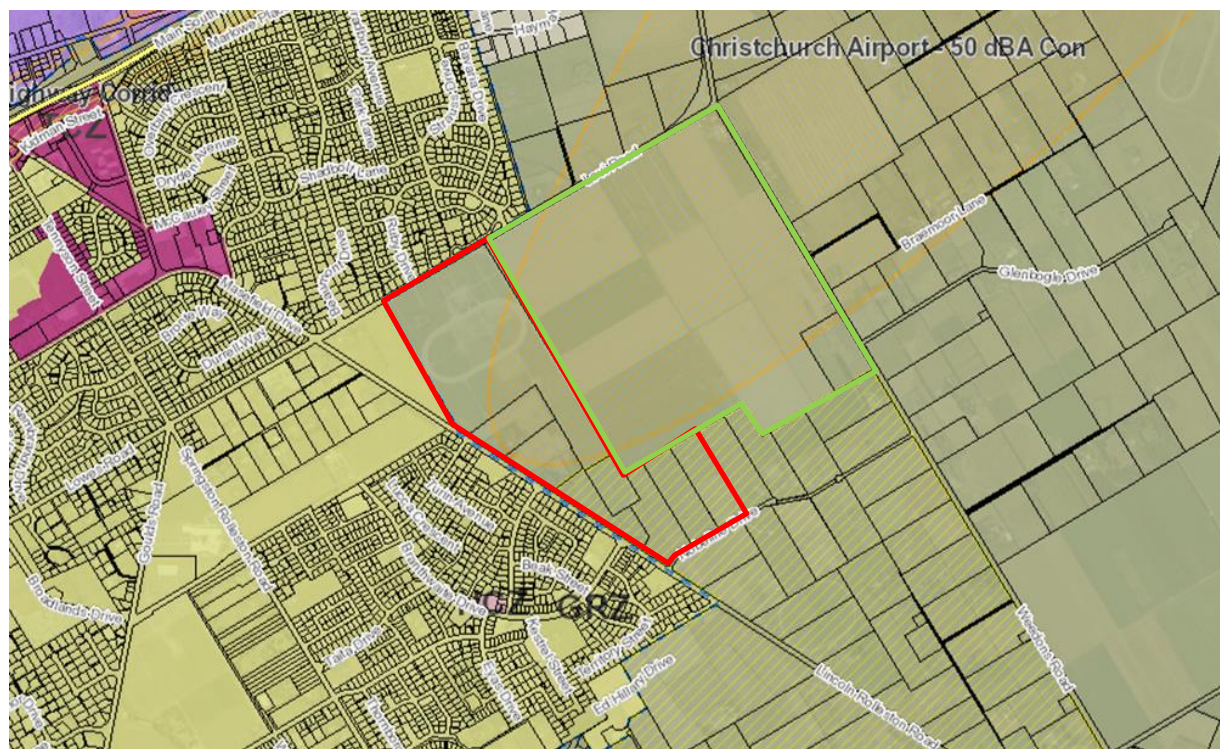


Figure 1: Site location & Proposed Selwyn District Plan zoning – site outlined in red; proposed District Reserve outlined in green; town centre -pink; residential zone – yellow; urban growth overlay – hatched yellow; airport noise contour – outlined in orange

The Submitters have lodged a private plan change request (see <https://www.selwyn.govt.nz/property-and-building/planning/strategies-and-plans/selwyn-district-plan/plan-changes/plan-change-71,-rezone-53.88-hectares-of-rural-inner-plains-land-to-living-z-and-living-z-deferred,-east-rolleston>) and submission on the Selwyn Proposed District Plan Review seeking rezoning for residential purposes (53.9 ha). Key points to note are that:-

- The Site is an ideal and logical location for further urban growth of Rolleston and will achieve a compact, and efficient, urban form with excellent connectivity by multiple transport modes as well as bridging the existing urban area to the proposed Council reserve to the east. It is far closer to the existing town centre, and I-zone and I-Port employment areas, than other new growth areas further south, towards Selwyn Road.
- the rezoning will accommodate a further 660 dwellings which represents the equivalent of 15% of the 2018 housing stock at Rolleston; it will supply significant additional capacity

and contribute to a well-functioning urban environment, meeting the NPS-UD Objective 6 c) and Policy 8 criteria for 'unanticipated' (in an RMA document) plan changes.

- Whilst a portion of the Site (less than 1/3rd) is under the current 50 dBA Ldn Christchurch International Airport noise contour but this is likely to move off the Site when the revised airport noise contours are released to the public¹. This land can be rezoned for residential purposes, but with the status of urban subdivision and housing non complying until the airport noise contour moves off the land.
- A high amenity master planned development is proposed.
- There is no additional cost to the Council in re-zoning the Site as there is capacity in the public utilities and the existing road network, including planned upgrades.

The Submitters are concerned to ensure that Proposed Change 1 provides an appropriate planning framework for meritorious proposals such as theirs - which give effect to the NPS-UD and will assist in addressing the current housing crisis by releasing more appropriately located land for a variety of housing types in response to demand, adding greater competition and supply to the land and housing markets.

Scope and timing

Change 1 is stated as a targeted change to provide a planning policy framework to enable District Plans to zone enough land to meet the RPS minimum medium term housing targets. 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.

However, Change 1 does not give effect to the National Policy Statement – Urban Development (NPS-UD) or its predecessor the National Policy Statement – Urban Development Capacity) in a number of fundamental ways, and in this respect cannot be supported in its current form (see below).

The Submitters acknowledge that Councils have until 2024 to prepare and publicly notify a Future Development Strategy and until 31 July 2021, a revised Housing Capacity Assessment. However, they do not consider the approach taken is sound planning in the Greater Christchurch context. There has been a 'flood' of private plan change applications lodged seeking urban rezoning since the NPS-UD was gazette in August 2020 - 13 to date in Selwyn District, in addition to a further 2 lodged prior to this, cumulatively capable of delivering 872 ha of further urban development, appx 10 000

¹ See Selwyn District private plan change request Plan Change 72 consultation record.
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households. There is clearly strong ‘pent up’ demand for further housing and business land, unable to be progressed prior to this due the very restrictive Canterbury Regional Policy Statement urban growth management ‘regime’. The Selwyn and Waimakariri District Plans are also under review now/to be notified in March 2021. Comprehensive change to the RPS policy framework is required now to enable these private requests and reviews to respond to and implement the NPS-UD.

National Policy Statement – Urban Development 2020

Change 1 does not give effect to the NPS-UD in a number of fundamental ways, and in this respect cannot be supported in its current form.

(i) Sufficient development capacity/housing capacity assessment

Change 1 only enables Councils to rezone enough land (and no more) to meet any shortfalls in land supply to meet the medium term (next 10 year) targets specified in Table 6.2.1a. These targets are the ‘minimums’ necessary to meet anticipated demand, and are, in combination with the fixed urban/rural boundary, a very restrictive urban growth management approach. They are completely at odds with the intent of the NPS-UD to *“improve housing affordability by supportive competitive land and development markets”* (competition is not achieved when there is very limited supply); provide *“at least sufficient development capacity to meet demand”*; and being *“responsive, in particular to proposals that would supply significant development capacity”*.

A minimum targets approach will fail to deliver if the targets underestimate demand. The targets were prepared for Our Space 2018-2048 and are already out of date. They are also very sensitive to assumptions made regarding what is feasible development and to the methodology employed, as recognized and acknowledged by the Our Space Commissioners.

The Council HCAs also tend to overestimate the capacity for infill development. For example, in the Rolleston context, the PC64 HCA finds that the Selwyn District Council (SDC) existing (2018) capacity assessment over-estimates the capacity remaining in the existing Rolleston Outline Development Plans by 1710 households or over 50% i.e. 3082 hhs compared to the PC64 estimate of 1372 hhs – see https://www.selwyn.govt.nz/_data/assets/pdf_file/0007/355867/Application-for-Notification-Appendix-F-Capacity-Assessments-20201008.pdf. The overestimate is principally because the SDC assessment does not take account of existing development constraints, including the existing pattern of small holdings and dwelling and curtilage areas which limit the capacity for

'infill', existing unusual shaped (and sized) lots, difficulties in achieving site amalgamation given the fragmented land ownership and access constraints, including existing rights of ways serving multiple small large holdings; or land designated or required for future infrastructure.

Given the high level of uncertainty with the accuracy, including over time, of the housing capacity minimum targets, some wriggle room should be applied i.e. more land released for development than is necessary to meet just, but not more than, the minimum targets set by Council derived HCAs. This is also consistent with the NPS-UD intent of providing for at least sufficient capacity to meet targets (now 'bottomlines' in the NPS-UD). There should also be the opportunity for evidence based assessment of those HCAs, with the ability for meritorious rezoning options to be considered which meet demand not adequately captured by the HCAs.

(ii) Fixed non contestable rural/urban boundary

This is retained and is clearly contrary to the NPS-UD 'responsive planning approach' (including RPS Objective 6.2.1). The development sector is a much better position to identify and respond quickly to changing market needs than local government bureaucracies. That is why a responsive planning approach is so important. Consequences of a fixed rural/urban boundary include:-

- Overly strict limitations on peripheral growth causes excessive land price inflation that in turn has a very negative effect on housing and business land 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);
- A contestable urban/rural boundary is not 'laissez-faire' and ad hoc and will not result in uncontained urban sprawl. The relevant planning documents can and should still require strategic planning including with respect to infrastructure, and an evidence base in support of any amendments to the boundary.

We understand that ECAN and the Greater Christchurch Partnership are concerned to ensure that the quantum of greenfield land released for development does act as a disincentive to urban intensification. However, the reality is:

- 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.

This was the finding of the Auckland Unitary Authority Commissioners hearing submissions on the Auckland Unitary Plan². We understand that ECAN propose a second Change (Change 2) to be notified soon (March – June 2021) which will set criteria for determining what plan changes will be treated, for the purposes of implementing Policy 8, as adding significantly to development capacity. However, this is not workable if the fixed urban/rural boundary line remains. The piecemeal and incomplete approach to addressing the requirements of the NPS-UD is not sound planning and is opposed.

(iii) Well functioning urban environments

The NPS-UD seeks to achieve well functioning environments and growth in locations close to employment, that are well serviced with public transport (existing or planned) and where there is high demand for housing and business land relative to other areas. The proposed FDAs in comparison to alternative locations have not been assessed against these criteria – the s32 assessment is silent on such assessment.

The Submitters Site is assessed against these criteria, as well as all other objectives and policies of the NPS-UD in their plan change request, and submission on the Proposed Selwyn District Plan (**Appendix A**) and easily meets them all. In summary:

- there will be a variety of homes enabled including medium density residential lots, and potentially a retirement village
- the Site is well-positioned, building as it does on an existing township well-serviced by public transport and cycling options, to provide good accessibility to jobs, community services and open spaces. It is within walking distance of the town centre (750m at its nearest point) and the proposed ODP/development plan shows access points and linkages in to the rest of Rolleston including to public transport routes, access to the Southern Motorway from Levi Road, and to the Rolleston park and ride facility
- the Site location mitigates climate change impacts and future natural hazards as it is located away from the coast and well removed from major rivers, and is easily accessible by public and active transport modes.
- The Site is well positioned with respect to major employment areas, being close to Rolleston town centre and the Izone and Iport business areas.

² See Our Space evidence for Submitter 60 GFR Rhodes Estate & Larsen Group - <https://greaterchristchurch.org.nz/our-work/background/our-space/ourspace-submissions/#Information>
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- There is high demand for further housing at Rolleston, with its principal attractions including its affordable housing, employment opportunities and the continually expanding wide range of local services and facilities.

(iv) FDAs – different spatial scenarios

The NPS-UD requires a consideration of the advantages and disadvantages of alternative spatial scenarios for the achieving the NPS-UD (s 3.14 (b)). Change 1 has not undertaken any such work, simply relying on the planning and infrastructure work undertaken when the PIB was first introduced 13 years ago.

The continuing appropriateness of the Rolleston PIB has not been re-considered. In the case of the Submitter's land, the entire Four Star Development property was excluded even though only a proportion is under the noise contour. There also needs to be flexibility to respond to impending changes to the airport noise contour as it affects Rolleston.

The s32 assessment considers as Option 6 'Advance greenfield area in other locations' but does not define any such other locations. This option is dismissed without further consideration as 'not preferable to the PIB areas, not necessary to meet feasible development capacity, and because the scope of Change 1 is too narrow..'.

(v) Our Space

Change 1 implements an action in Our Space (2019) i.e. Action 9. Our Space identifies Future Development Areas on Map A of the RPS (Figure 16 of Our Space) but importantly notes:

Figure 16: Proposed locations of future development areas in Greater Christchurch. While it is intended Our Space provides some direction to inform future RMA processes, Figure 16 is indicative only

These FDAs are now shown on Map A of Change 1 to the RPS – but urban development is entirely restricted to these FDAs only – even though they are intended to be indicative only. The flexibility in providing for future development areas that Our Space recommended is simply not recognized or provided for in Change 1. There is no ability for land outside the FDAs to be considered, even though the NPS-UD is very clear that a fixed 'immoveable' urban/rural boundary is contrary to the NPS-UD (see MfE Guidance note on Responsive Planning).

(vi) Future Development Areas & Timing of Release of Land

The Change 1 proposed FDAs are at south Rolleston, west and east Rangiora and north east Kaiapoi. These FDAs follow the Map A Projected Infrastructure Boundary for future residential areas only. The PIB was identified at the time Chapter 6 of the RPS was first prepared (it was first known as Change 1 to the RPS, notified in 2007 with decisions issued in 2009). It has been in place for 13 years, and predates the Canterbury 2010/11 earthquakes and the significant shift of the Greater Christchurch area westwards onto land less at risk of natural hazards (including earthquake events and sea level rise). It has not been subject to rigorous testing as the LURP (Land Use Recovery Plan) processes 'replaced' the normal RMA processes post the Canterbury earthquakes, with no appeal rights other than on points of law.

Rolleston has continued to grow at pace in recent years. The accessibility to the City has also been greatly enhanced by the Southern Motorway and its recent extension. Change 1 proposes and FDA at south Rolleston, which only includes part of the Submitter's land, even though it is much closer and more readily accessible than other FDA land further south. The Submitter's land needs to be included in the Rolleston FDA.

Section 32 Assessment

The Change 1 s32 assessment does not assess the identified options against the NPS-UD objectives and policies, even though its purpose is to give effect to NPS-UD directions. It is inadequate and incomplete.

RMA

For all of the above reasons, Proposed Change 1 is contrary to the RMA, including Part 2 and s32 and does not constitute sound resource management practice.

Decision/Relief Sought

1. Amendments to Change 1 to provide a more flexible and responsive urban growth management approach. This could include (but not be limited to)
 - enabling consideration of development proposals, private plan change requests and submissions on Plan Reviews which are outside the Change 1 Map A FDAs, priority greenfield and existing urban areas; and/or
 - which exceed the minimum targets in Table 6.2.1a; and
 - are consistent with and give effect to the NPS-UD; and

- amendments to Policy 6.3.11 Monitoring and Review, Policy 6.3.12 Future Development Areas; and
 - change the status of FDAs to Greenfield Areas, with no restrictions on the quantum or timing of development; and
 - the changes outlined below; and
 - and/or in the case of resource consents, are of a minor nature (including zoning anomalies) and do not offend the overall strategic planning intent of the Chapter 6
2. If Map A is retained in its current form, amend by showing all of the Submitter's Site ie including the additional land outlined below (Figure 1) in orange as a Future Development Area - Residential.

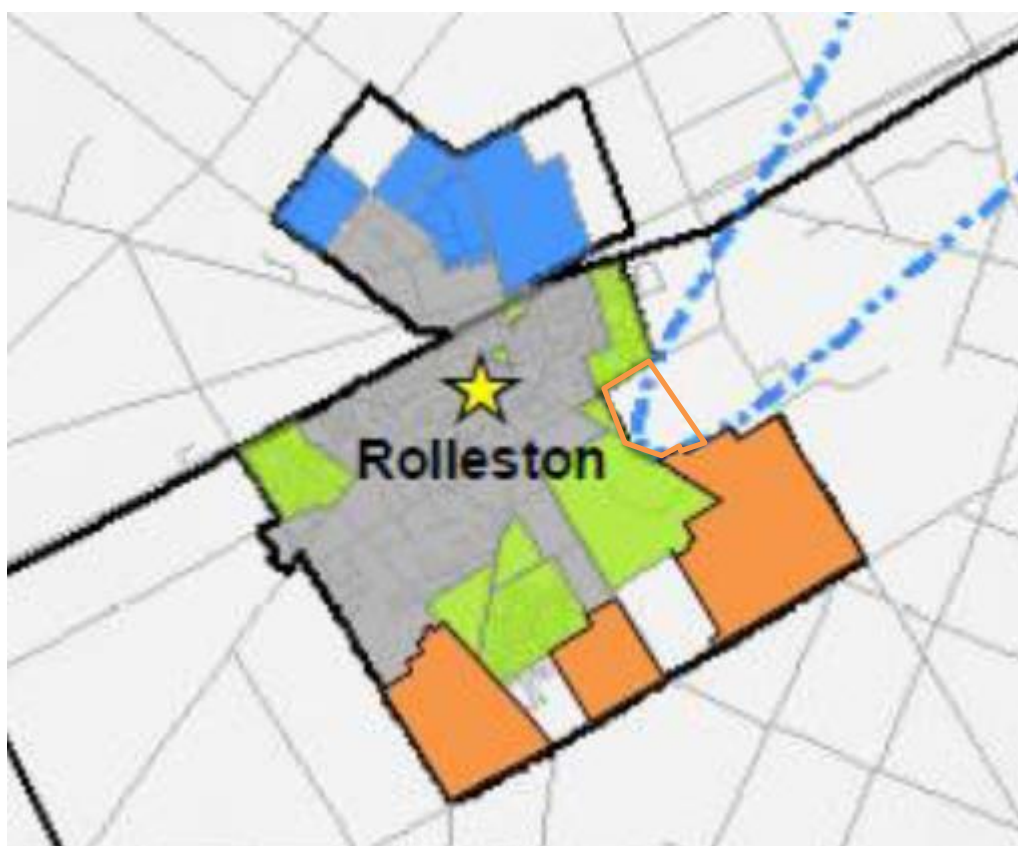


Figure 1: amendment to Rolleston Future Development Area – Residential (outlined in orange)

3. Amend Proposed Change 1 as below. Additions in bold and underlined. Deletions in strike out.

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 unless expressly provided for in the CRPS;~~

Reason:

A fixed uncontestable urban/rural boundary as shown on Map A and associated RPS objective and policies does not give effect to the NPS-UD which requires a responsive planning approach (Objective 6c) and Policy 8). The Ministry for Environment Responsive Planning Guidance specifically states:

a hard rural urban boundary without the ability to consider change or movement of that boundary would not meet the requirements of the responsive planning policy.³;

and if FDAs are retained,

6.3.1 Development within the Greater Christchurch area

In relation to recovery and rebuilding for Greater Christchurch:...

4. Enable development of existing urban areas and greenfield priority areas and **Future Development Areas**, including intensification in appropriate locations., ~~where is supports the recovery of Greater Christchurch.~~

5. Ensure new urban activities only occur within existing urban areas, ~~or~~ identified greenfield priority areas **and/ or Future Development Areas** as shown on Map A....

4. Any consequential amendments and such other additional or alternative relief as gives effect to the intent of this submission and is consistent with the interests of the Submitter.



.....
(Signature of applicant or person authorized to sign on behalf of the applicant)

Date: February 15, 2021

Appendix A: Assessment of Submitter's Site Against NPS-UD 2020

³ NPS-UD 2020 MfE Responsive Planning Fact Sheet
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Appendix A: Assessment of NPS-UD 2020 Objectives and Policies

Acronyms

CIAL: Christchurch International Airport Limited

FDS: Future development Strategy

NPS-UD: National Policy Statement-Urban Development 2020

PSDP: Proposed Selwyn District Plan

RPS: Canterbury Regional Policy Statement

NPS-UD Objectives	Assessment
Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	The proposed development will enable Rolleston to sustain itself as a well-functioning urban environment by consolidating the residential area close to the town centre, and provide residential development close to public transport links and the proposed District Council reserve.
Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.	The proposal provides choices in the Rolleston housing market and in doing so supports housing affordability. The applicant, Gould Developments is nearing completion of a 102 lot subdivision & housing development at Goulds Road Rolleston (all lots sold, 15-20 houses remaining to be constructed). The director of the development company has had a long term involvement in sales and marketing of Rolleston subdivisions since the mid 1990s so has an indepth knowledge of the market. The company wish to remain active in the local market but there is no remaining zoned land available for development. Plan Change 64 proposes rezoning to enable development of another 930 sections over the next 6-8 years. However, it is critical that development opportunities are made available to other landowners to ensure a competitive land and housing market rather than a 'monopoly situation'. After the Canterbury earthquakes in 2010 and 2011 Greater Christchurch, including Rolleston benefitted from the release of significant amounts of greenfield land for development, which ensured competition between landowners and developers and competitive land and house prices. Greater Christchurch house and land prices are still far more competitive than other major centres including Wellington, Auckland and Queenstown but a competitive market will not

	continue if there is a shortage of development land.
Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply: the area is in or near a centre zone or other area with many employment opportunities the area; is well-served by existing or planned public transport; and there is high demand for housing or for business land in the area, relative to other areas within the urban environment.	<p>The RPS is due for review in 2023 and a more immediate change is required to achieve consistency with the NPS-UD. The current priority greenfield development areas at Rolleston shown on RPS Map A (which are the PSDP eight Rolleston development areas/Operative District Plan ODPs) do not meet short, medium or long term housing demand at Rolleston. Further greenfield land is required. This proposal is outside but adjoins the existing development areas (Development RO1/ODP Area 4). It is the closer to the town centre than any of the existing development areas, except RO1/ODP Area 2 and R02/ODP Area 9 (which are at a similar distance but remain undeveloped due to land ownership, fragmentation and access issues). The Site occupies a block of rural land that will square up the town in its urban form, and will connect the existing built up area of Rolleston with the proposed District Council reserve to the east of the development area.</p> <p>The restriction imposed by the CIAL noise contour effectively creates three development areas. The two areas outside the contour can yield around 450 lots. That alone will assist in meeting the high demand for housing in Rolleston. There is potentially a further 220 lots affected by the contour which is likely to move off this land in the future (at the time of the RPS review).</p> <p>The land meets all the Objective 3 locational criteria for more land for housing – the Site is close to the Rolleston town centre and Izone and Iport business areas which are a major employment area; Rolleston is well serviced by public transport, including to Christchurch City and Lincoln with a park n' ride scheme in central Rolleston; and there is an ongoing high demand for housing, with Rolleston's principal attractions including its affordable housing, employment opportunities and the continually expanding wide range of local services and facilities.</p>
Objective 4: New Zealand's urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.	The proposal provides for a General Residential /Living Z zone within which provision is made for medium density housing and potentially a retirement village with local amenity reserves to cater for the diverse and changing needs of

	people and the Rolleston community. The Site has a Council District Reserve on its eastern boundary providing immense potential amenity and quality of environment benefits.
Objective 5: Planning decisions relating to urban environments, and FDSs, take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).	Matter for statutory decision-makers.
Objective 6: Local authority decisions on urban development that affect urban environments are: integrated with infrastructure planning and funding decisions; and strategic over the medium term and long term; and responsive, particularly in relation to proposals that would supply significant development capacity.	The proponents have met with Council asset staff who have confirmed that the proposal can be properly serviced and is within the capacity of existing and planned public infrastructure. See Policy 8 below re comments on proposals that would supply significant development capacity.
Objective 7: Local authorities have robust and frequently updated information about their urban environments and use it to inform planning decisions.	Matter for statutory decision-makers.
Objective 8: New Zealand's urban environments: support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change.	The proposal adjoins the existing built up area of Rolleston, close to public transport links and adjoins the proposed Council Reserve. Its excellent accessibility and the self sufficiency of Rolleston reduces the need for private vehicle trips, reducing potential for greenhouse gas emissions. The land is inland and not subject to natural hazard risks associated with sea level rise arising from climate change.
NPS-UD Policies	Assessment
<p>Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:</p> <ul style="list-style-type: none"> (a) have or enable a variety of homes that: <ul style="list-style-type: none"> (i) meet the needs, in terms of type, price, and location, of different households; and (ii) enable Māori to express their cultural traditions and norms; and (b) N/A business sectors; and (c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and (d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and (e) support reductions in greenhouse gas emissions; and 	<p>The proposal is for General Residential LZ zoning and includes some medium density blocks and a possible retirement village which will enable a variety of homes that will help meet the needs of different households. The site location provides good accessibility to workplaces, community facilities and open spaces in the in-development reserve and the adjoining Council Reserve.</p> <p>The proposal will enable another developer to remain active in the Rolleston market which will provide choice and competition to the local land and housing market.</p> <p>The location of the Site is within walking distance of the town centre (750m at its nearest point) and the ODP/development plan shows access points and linkages in to the rest of Rolleston including to public transport routes, access to the Southern Motorway from Levi Road, and to the park and ride facility.</p>

(f) are resilient to the likely current and future effects of climate change.	
Policy 2: Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.	<p>The PSDP/Operative District Plan provide eight development areas/ODP areas for Rolleston, some of which are well advanced in development. Those which are not are subject to land ownership, access, existing dwelling development and land aggregation issues which limit their effective ability to supply additional development capacity.</p> <p>The Levi Road proposal provides additional capacity to ensure that there is, actually, sufficient development capacity for a town that is growing apace and will continue to do so for the 10 year planning life of the District Plan. Evidence from real estate agents shows the surge in lot uptake and interest in Rolleston in recent years.</p>
<p>Policy 3: In relation to tier 1 urban environments, regional policy statements and district plans enable:</p> <p>(a) N/A in city centre zones,; and</p> <p>(b) N/A in metropolitan centre zones, and</p> <p>(c) N/A building heights of least 6 storeys within at least a walkable catchment...</p> <p>(d) in all other locations in the tier 1 urban environment, building heights and density of urban form commensurate with the greater of:</p> <p>(i) the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services; or</p> <p>(ii) relative demand for housing and business use in that location.</p>	<p>The proposal adopts Zones and zone development and activity standards set in the PSDP/Operative District Plan respectively. These make provision for suburban-type housing typologies and medium density housing. The maximum height limit is 8m which limits development to two storeys.</p>
Policy 4: Regional policy statements and district plans applying to tier 1 urban environments modify the relevant building height or density requirements under Policy 3 only to the extent necessary (as specified in subpart 6) to accommodate a qualifying matter in that area.	The proposal adopts Zones and zone development and activity standards set in the PSDP/Operative District Plan respectively.
Policy 5: N/A Regional policy statements and district plans applying to tier 2 and 3 urban environments	<p>N/A</p> <p>Rolleston is within Greater Christchurch and is defined as part of a Tier 1 urban area.</p>
Policy 6: When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters: (a) the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement	The District Council in preparing the Rolleston Structure Plan (2009) engaged with the Rolleston community over possible urban futures for the town. The Rolleston Structure Plan is now over 10 years old and overdue for review.

<p>(b) that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes:</p> <p>(i) may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and</p> <p>(ii) are not, of themselves, an adverse effect</p> <p>(c) the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1)</p> <p>(d) any relevant contribution that will be made to meeting the requirements of this National Policy Statement to provide or realise development capacity</p> <p>(e) the likely current and future effects of climate change.</p>	<p>The northern and central portions of the Site were not preferred as a future urban option because of the dominant and uncertain long term effect of the CIAL noise contour. Whilst the greater part of the northern site is outside the noise contour, the future growth areas followed legal title boundaries. As this land is held in the same title as land under the contour, it was all excluded. The Council retained Inner Plains Rural despite the factors of location, future urban form and ease of servicing that are features of the Site.</p> <p>The proposal will significantly contribute to the housing market in Rolleston offering 660+ lots at full development and in a location much more favourable for achieving great urban design outcomes than most of the identified development areas. It will supply significant additional capacity (an additional 12%) to the existing Rolleston land and housing supply.</p> <p>The proposal to re-zone the Site as General Residential/LZ is not out of step with the proposals in the PSDP/Operative District Plan.</p> <p>The proposal will result in a form of development consistent with that which dominates Rolleston and the ODP/Development Plan for the Site provides control over the key structural elements of the development. That ensures there is good integration to adjoining residential land and appropriate access points are locked in to provide for ease of movement and not just by car. The amenity values are set by the PSDP/Operative District Plan subdivision, development and activity standards so the Site will comfortably relate to, and form part of, the rest of Rolleston as it develops.</p> <p>Additionally the Site benefits for its co-location adjoining the future Council Reserve.</p>
<p>Policy 7: Tier 1 and 2 local authorities set housing bottom lines for the short-medium term and the long term in their regional policy statements and district plans.</p>	<p>This requires a change to the RPS. The RPS contains housing targets (Table 6.1) which were inserted to meet the requirements of the NPS-UDC. They are now out of date as the NPS-UDC has been replaced by the NPS-UD. It is understood revised housing capacity assessments must be completed by July 2021.</p>
<p>Policy 8: Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well</p>	<p>This Policy can be read to apply to submissions to the PSDP and plan changes.</p> <p>This proposal will potentially at full development add 660 + lots (an additional 12% over and above existing zoned supply) to the</p>

<p>functioning urban environments, even if the development capacity is:</p> <p>(a) unanticipated by RMA planning documents; or</p> <p>(b) out-of-sequence with planned land release.</p>	<p>housing supply for Rolleston and its location in the “gap” between the existing urban area and the proposed Council Reserve to the south will assist in delivering a compact, linked up well-functioning urban environment.</p>
<p>Policy 9: Local authorities, in taking account of the principles of the Treaty of Waitangi (Te Tiriti o Waitangi) in relation to urban environments, must:</p> <p>(a) involve hapū and iwi in the preparation of RMA planning documents and any FDSs by undertaking effective consultation that is early, meaningful and, as far as practicable, in accordance with tikanga Māori; and</p> <p>(b) when preparing RMA planning documents and FDSs, take into account the values and aspirations of hapū and iwi for urban development; and</p> <p>(c) provide opportunities in appropriate circumstances for Māori involvement in decision-making on resource consents, designations, heritage orders, and water conservation orders, including in relation to sites of significance to Māori and issues of cultural significance; and</p> <p>(d) operate in a way that is consistent with iwi participation legislation.</p>	<p>Matter for statutory decision-makers.</p>
<p>Policy 10: Tier 1, 2, and 3 local authorities:</p> <p>(a) that share jurisdiction over urban environments work together when implementing this National Policy Statement; and</p> <p>(b) engage with providers of development infrastructure and additional infrastructure to achieve integrated land use and infrastructure planning; and</p> <p>(c) engage with the development sector to identify significant opportunities for urban development.</p>	<p>There is a present planning hiatus in greater Christchurch awaiting engagement on the foreshadowed change to the RPS (date unknown) followed by a full review in 2023. This submission/plan change application enables the Greater Christchurch Councils to engage in the proposal ahead of the change to the RPS.</p>
<p>Policy 11: In relation to car parking:</p> <p>(a) the district plans of tier 1, 2, and 3 territorial authorities do not set minimum car parking rate requirements, other than for accessible car parks; and</p> <p>(b) tier 1, 2, and 3 local authorities are strongly encouraged to manage effects associated with the supply and demand of car parking through comprehensive parking management plans.</p>	<p>The proposal adopts Zones and zone development and activity standards set in the PSDP/Operative District Plan.</p>